



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

NATIONAL WILD  
HORSE & BURRO  
ADVISORY BOARD

October 5-6, 2022

Volume 2

Day 2 Meeting Minutes

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

## Contents

|  |          |
|--|----------|
| <b>THURSDAY, OCTOBER 6, 2022 .....</b>                           | <b>2</b> |
| WELCOME AND CALL TO ORDER.....                                   | 2        |
| AGENDA & RULES OF THE ZOOM (VIRTUAL/ONLINE PLATFORM).....        | 2        |
| INTRODUCTIONS .....  | 2        |
| AGENCY PRESENTATIONS TO THE BOARD .....                          | 2        |
| BLM WHB PROGRAM RESEARCH UPDATE .....                            | 2        |
| BLM ARIZONA WILD BURRO PILOT PROJECT – THE PLATERO PROJECT ..... | 10       |
| BLM ADOPTION INCENTIVE PROGRAM PRESENTATION.....                 | 17       |
| DISCUSSION ON BOARD RECOMMENDATIONS .....                        | 27       |
| PUBLIC COMMENT PERIOD (3) .....                                  | 34       |
| FINALIZATION OF BOARD RECOMMENDATIONS TO THE BLM .....           | 44       |
| CONCLUSION.....  | 50       |

## Thursday, October 6, 2022

### Welcome and Call to Order

*Bryant Kuechle, Facilitator, The Langdon Group*

Mr. Kuechle welcomed attendees to the Wild Horse and Burro Advisory Board meeting and introduced himself and his role as a neutral third-party facilitator.

### Agenda & Rules of the Zoom (Virtual/Online Platform)

*Bryant Kuechle, Facilitator, The Langdon Group*

Mr. Kuechle reviewed the procedural elements for public participation, stating that the BLM recognizes the value of public input and appreciates public interest in expressing themselves regarding matters of concern. He explained the process for registering to provide public comment, noting that there would be three designated opportunities to do so. Mr. Kuechle reviewed the day's agenda.

### Introductions

*Ms. Celeste Carlisle, Wild Horse and Burro Advisory Board Chair*

Ms. Carlisle welcomed the Advisory Board members, Staff, and all attending by live stream. She called the meeting to order and introduced Dr. David Jenkins as the BLM designated federal officer and Ms. Holle' Waddell as Division Chief of the BLM Wild Horse and Burro Program. Ms. Celeste Carlisle introduced the members of the board (see Table 1).

| TABLE 1 - NATIONAL WILD HORSE & BURRO ADVISORY BOARD MEMBERS |   |
|--|---|
| Board Member   | Representing                            |
| Ms. Tammy Pearson  | Public Interest (Equine Behavior)       |
| Dr. Tom Lenz, DVM  | Veterinary Medicine                     |
| Ms. Celeste Carlisle   | Wild Horse & Burro Advocacy             |
| Dr. Barry Perryman   | Public Interest (NRM/Special Knowledge) |
| Mr. James French   | Natural Resource Management             |
| Dr. Ursula Bechert   | Wild Horse & Burro Research             |
| Ms. Susan McAlpine   | Humane Advocacy                         |
| Mr. Steven Yardley   | Livestock Management                    |
| Dr. Vernon Bleich  | Wildlife Management                     |

### Agency Presentations to the Board

Presentations were given to the board via PowerPoint as follows [see Table 2].

| TABLE 2 - PRESENTATIONS TO ADVISORY BOARD                  |  |
|--|--|
| Presentation   | Presenter  |
| BLM WHB Program Research Update                            | Dr. Paul Griffin, BLM  |
| BLM Arizona Wild Burro Pilot Project – The Platero Project | Mr. Chad Benson, BLM; and Ms. Stephanie Boyles Griffin, The Humane Society of the US |
| BLM Adoption Incentive Program Update                      | Ms. Jerrie Bertola, BLM  |

### BLM WHB Program Research Update

*Dr. Paul Griffin, Wild Horse and Burro Research Coordinator, BLM*

Thank you for the opportunity to talk about the role that research plays in our program. First, I want to acknowledge all the personnel and funders and researchers and collaborators that make all that research work possible and help us to translate it toward management. And it goes without saying that the motivation is the long-term wellbeing of the animals

and the landscapes that they grace. Oh, and I also want to thank Card and the IT team. I don't think they were mentioned, they've been for putting together this meeting and making the livestream possible. Got to acknowledge them because those guys might put a cat filter on your face if you don't. Oh, thanks. Thanks. Well, from the beginning, scientists and managers have worked together to improve the knowledge that we have about the horses and burros and to lead to better outcomes for sustaining wild horses and burros on public lands in the Western United States. This morning I proposed to address a few highlights from our program, but it's your meeting, so please divert me from this outline, if you want. The slides that we're going to, that I have prepared would take about 20 minutes. So that'll leave for I think time for discussion. First, I would touch on the highest priorities from the 2021 Strategic Research Plan and address why we still see fertility control as so important, and share some new results about GonaCon from monitoring. Then I would talk about six new projects that the BLM is supporting or is considering supporting, which came out of a 2021 request for proposals. And I would talk about few research projects that the BLM supports and permits, but is not funding. Finally, the board asked that we use this opportunity to highlight a pilot project here in Arizona where the BLM partnered with the Humane Society and the Kingman Field Office to assess how much effort it takes to dart burros with the PZP vaccine ZonaStat-H. Well, the board has talked a lot already about how ecological condition of the public lands is changing and will change more and faster in the coming decades. That means hotter for sure and it means different patterns of moisture in terms of amount, seasonal timing, variation between years, including droughts. And you've also addressed how Appropriate Management Levels are meant to allow for land health standards to be met, based on the natural resources and that are available locally and multiple use. Getting herds down to AML and keeping them in that range is really essential for ecosystem health, we know that, that's a big motivation for testing humane, longer-lasting fertility control. But as you have discussed already, the AML and other land use planning decisions that were based on past resource conditions, may need to be addressed reconsidered to ensure animal welfare and ecosystem health. The BLM's two highest priorities for Wild Horse and Burro research are connected and motivated by that concern over Wild Horse and Burro Welfare and Ecosystem Conservation, so they are linked. The highest priority is for effective long-lasting fertility controls for mares, those could mean fewer gatherers and removals of excess horses and burros. And if applied more stable low-density herds that allow for ecological resilience with less animal handling. And we acknowledge, horses and burros can have some ecological benefits, but not when they are overpopulated compared to local levels of available natural resources. So single treatment long-lasting fertility control has been a BLM goal for many years and with good reason. Mares usually have very high fertility rates and they live for decades or they can. The majority of BLM fertility controlled treatments today, either use the PZP vaccine ZonaStat-H or GonaCon equine vaccine. But single-doses of either of those, tend to only have effects that last for about one or two years. And recapturing, retreating, even tracking and darting wild horses, it can be expensive and difficult and in many places, it's harder even to dart. Very hard to dart in many places. And so, as I said, climate change, ertification, changes in rainfall, worsening drought, all those increase the need for longer-lasting fertility control, making it the high, our highest priority. But it does sign in with the BLM second highest priority for which is for Wild Horse and Burrow studies that focus on equids and how they interact with their environments, both effects of the animals on the range and effects of the habitats on the animals. And we would like to have more information about those relationships in a way that will inform us and help us make landscapes more resilient to climate change. So in November, we released to the public our Strategic Research Plan. Dr. Bechert was instrumental and reviewing early versions of that. And then also last year in November, we released a notice of funding opportunity to the public and a request for funding proposals. So we called for proposals that would address either of these two highest priorities for research. We also identified in our research plan some lower funding priorities for research. These are topics that we know are important, could be useful, informative for our management, but of lower priority relative to funding. So these are ways to improve herd size estimates, new advances in population genetics, better in understanding on how to improve health handling and welfare or improve our private care placement. And of course, some into central to all of these discussions is just human dimensions of wild horse and burro management. Thank you. So we know that longer-lasting fertility control could reduce the cost, the number of animals that need to be handled and treated and could help the BLM keep herds within AML for a longer time. Generally, kind of general terms, horses are so fertile and long-lived that herds will tend to keep growing unless about 70% of the mares are contraceptive. Now different HMAs will have different circumstances, so there's really no one method that will be the best treatment for every herd circumstance. But in most cases we do know that getting down to near AML will need to happen with the help of removals. And we know that in any herd that has fertility controlled treatment, there should be long-term monitoring of the herd sizes and growth rates to test their, the effectiveness of that treatment. So this graph shows some outputs from a model called PopEquus, you might have heard of it. Several years ago, the BLM funded the USGS to create and develop that population model. It was a high-priority for us identified out of the 2013 National Academies of Sciences report. So that was something that we've been facilitating for a lot of years and we're happy to see that it's probably going to be published this fall and made available to the public. It's a

model that allows for a range of different fertility control treatment types and different timing of gathers. And what it projects is population sizes over time and cost in terms of on range costs and off range costs. Well, this example that I'm showing here doesn't show the full-range of what the model can do, but it's some simplified graphs and they show three different alternatives for some hypothetical Herd Management Area with a starting herd size of 500 in year zero and an Appropriate Management Level of 200 to 300. And there's three alternatives. There's a gather in year one for all three of the alternatives. The blue dotted line on top that shows the projected herd size if there were gathers and removals and treatment with PZP ZonaStat-H vaccine in years one and five. And under that alternative by year 10, 76 mares have been treated with PZP, 454 get removed. The final herd size is 447 and the costs, including long-term holding costs add up to \$3.6 million. The black line in the middle shows the predicted herd size over time if there are gathers and removals and GonaCon-Equine treatment in years one and five. And under that alternative 64 mares get treated, 442 get removed. You can't see those numbers. Well, for the removals are there. The final herd size is a little lower 371 and it costs \$3.4 million. And then the orange dash line and the bottom there shows the predicted outcomes, if there were gathers and removals and some form of humane safe, minimally invasive mares sterilization. And the BLM has not used that approach yet in management. So I'm talking about some humane method that could prevent a mare from any further pregnancies after just one handling occasion. And in this simulation, 58 mares are treated, 438 are removed. The final herd size is 296, which is within AML, and the total cost is \$3.3 million. And you'll see the herd is still growing, but at a slower rate than other, under the other alternatives. Anyway, people can play in with this model and try a whole lot of different approaches and alternatives for themselves. That's one of the nice things about it. But what this example does show is just that modeling confirms that, if we have longer-lasting fertility control methods and booster GonaCon is an example that can reduce the number of animals that need to be handled, reduce the costs and if it's done right, can also keep the herds within AML. Okay, so all of BLM's management actions are taken with a clear goal of ensuring that wild horse and burro populations are self-sustaining on public lands. But we want to address something else that research has shown and that is that even the current fertility control methods, these vaccines, namely ZonaStat-H, PZP ZonaStat-H vaccine and GonaCon-Equine, they can cause a mare to have no more foals. And if a mare dies before she regains fertility, most people would say that she was effectively made sterile by that treatment, so just want to acknowledge that. Several kinds of PZP vaccines have been shown to shrink mares ovarian volume and change their hormone levels. And with ZonaStat-H specifically, four or more doses can cause sterility. Is that fundamentally a problem, if some fraction of the mares are sterile in a herd? Well, you know, with respect to ensuring that herds can keep growing, the answer is no. It's going to depend on how big is that fraction of mares that's sterile and there's some other circumstances too that will affect that. And okay, so we use PZP and GonaCon. There are already some herds where managers plan ahead, so that specific mares produce one or more foals before they are then kept infertile for the remainder of their life, even though they might live many more years in the wild. You know, Pryor Mountains comes to mind as an example of that. But that kind of really fine scale fertility control and fine scale selection of individual mares is not required to maintain genetic diversity and self-sustaining herd growth and herd health in most herds. Anyway, all this is saying is that if it could be useful to have a variety of different fertility control methods to choose from. The effects of different treatments applied to different fractions of a population and at different time periods can be modeled and to forecast the expected population dynamics in the future. The actual choices of which methods and at what timing would depend on Herd Management Area-specific goals, animal approachability, access a whole lot of other factors. So I talked about PZP. I also want to address what we know about GonaCon-Equine vaccine, including some new results from monitoring and research. On this slide, I'm going to show, I'm showing a few results about the reduction in fertility for GonaCon treated mares. And that's shown in blue as percentages. So that's in comparison to untreated mares. So 100% reduction would be completely infertile for whatever year. So in research at Theodore Roosevelt National Park, there was a randomized experiment study with treated and untreated mares. And in that work, one dose of GonaCon by itself led to about something like 37% reduction in the first year after treatment of reduction infertility. So effective contraception and 28% in the second year. So that's really not a lot lower fertility compared to controls from just the one dose of GonaCon. But the study showed that after two doses of hand-in injected GonaCon and separated by about four years between the primer dose and the booster dose, there's this almost, well 100% reduction in fertility the first year after that and then down to 80% a couple years later. So they stayed quite infertile for three years and that was where it was published in 2018. Now, what hasn't been published yet is that a large number of those same mares were still infertile 4 to 6 years after treatment through 2020. The number was less, I don't, I can't say the exact number less, but it was, some of the mares reversed, they regained fertility. So it is a sign that some mares were returning to fertility, but it was still effective for a very, you know, we're talking about six years for a large fraction of the mares. So with respect to concerns about sterility, how would we interpret those results? Well, it's possible that a 14-year-old mare who gets two hand-in injected doses of GonaCon-Equine might remain infertile until she dies. Like if she dies at age 20, then she would, you would say she was sterile. Okay, another element of the results from Theodore Roosevelt

National Park that haven't been published yet, but we're looking forward to is that it looks like two doses of the darted booster GonaCon. So when delivered by Dart, instead of hand-injection did not have the same duration of effect or high-level of effectiveness as two doses of hand-injection. I'm not sure exactly why, and I don't think that these percentages shown here are precise or exact looking forward to that publication. So anyway, like I said, we know one dose of GonaCon by itself didn't lead to high duration of effect. So what BLM has been doing in some cases is capturing mares, treating them with a first dose of GonaCon, holding them for 30 days, treating them with a second dose of GonaCon and then releasing them. And that is comparable to the kind of work that is done with PZP, initial doses of PZP ZonaStat-H also require an animal to get a booster dose about 30 days after it's initially caught. So I'm going to share some results from monitoring that we did these are results based on cases where we caught mares, treated them with a dose of GonaCon, held them for about 30 or more days and then released them to the range. But what we did was we asked the USGS to help us out and provide some technical assistance with monitoring, they radio collared subset of those mares and have been monitoring them, their folding rates and movements. But, so this is not from research per se, it's not a controlled study. We didn't turn back any untreated mares to serve as comparison. But what we did see is that a reduction in fertility. So in 2021, most of the mares fold, that's what you'd expect. GonaCon doesn't interrupt pregnancies in progress generally. So 2022 was the first year that you'd see any results changes, decreases in the folding rates. And in 2022, only about 15% of those mares that were treated with this two dose regime of GonaCon separated by 30 or more days had falls. So that's a little bit of animal holding to give them that second dose, but it does lead to a much higher effectiveness than a single-dose. So we view that as promising. Okay, so I also, I want to just dwell on this a little more because I know people have some concerns. I want to show some other results from earlier research to explore the question more. Is it genetically okay, if some wild horses don't reproduce? Well, the point of this slide is that yes, if some planned fraction of mares are treated with a fertility control method, it causes them to have no more falls. That will not cause the wholesale loss of unique genetic diversity in the broader metapopulation of horses. That is the set of interacting horse herds. Most local herd planning decisions, include measures to avoid the negative effects of inbreeding. And that includes monitoring genetic diversity. So we have a contract to do and being ready to introduce animals from other herds, if needed. So what this slide shows, it's kind of to be a colored representation of what's called the fixation index, which is a measure of how much any two populations are closely related to each other or divergent from each other genetically. And these are results from the 2013 National Academies of Sciences report from 183 sampled sets. I think it's about 125 herds. Some of them were sampled twice or more. Anyway, what they show is, oh, is that most managed wild horse herds are highly related to each other and are not genetically unique. So these 183 samples are shown in this matrix. Each cell, tiny little dot in the matrix has a value of fixation index, but it's color coded where the gray cells represent a fixation index of about 0.05, which signifies virtually no genetic differentiation between two sample sets. So the gray cells are extremely related herds. The orange cells are values for this fixation index of about a 0.1, which is interpreted as being very little difference between herds. So still quite related to each other. And only those purple cells signify a fixation index of 0.05 or so, which it means that those pairs of herds have elevated levels of differentiation. So you can see a very small number of herds are different from other herds. Most herds are quite similar to a large number of other herds. So that's the big picture. Most herds are very related to lot of other herds and it's not all that surprising because these herds mostly are a mix of fairly recent domestic breeds with a history of natural movements and human introductions. So let's talk about new fertility control studies that the agency is considering funding. In November, 2021, we put out this request for proposals and a funding opportunity for anybody pretty much to propose long studies of fertility control or of wild horses and burros in the environment. And we solicited those proposals, government agencies, universities, individuals, nonprofits, anybody. Those proposals were reviewed by external expert peer reviewers. They were also reviewed by internal reviewers who assessed how well the proposals addressed BLM's needs and potential public benefit. The external reviewers were subject matter experts and they assessed the scientific merit of these proposals. So there are three studies after review that we are considering, supporting in the long-term. And these would use wild mares. So they're analyzed in detail in a preliminary environmental assessment that we released to the public in July and that environmental assessment is called Wild Mare Fertility Control Research. We also had a press release, so, and we solicited public comments through which we received through August 22nd and we're still considering those comments. So the agency, we do not have a final EA, we do not have a decision record yet. So I won't go into these in great detail because they're in the Preliminary EA, there's three studies. Study A, would test four formulations of Oocyte Growth Factor Vaccines in a pen trial. These are vaccines against two proteins that are known to influence the development of immature eggs in air ovaries, but they don't appear to have other roles outside the reproductive system. The study would test four vaccine adjuvant formulations to see which of those four, which two cause the strongest immune responses, and then those two formulations would be used and mares would get one dose of each of those two, either of those two formulations, and they would live with stallions in a pen for several years. And the researchers would monitor the vaccine effects in terms of through blood



testing and reproductive system monitoring and pregnancy rates. The second study, study B, would be a pen trial that tests a kind of PZP vaccine called SpayVac, and specifically would test whether the vaccine is effectiveness is higher or lower, longer-lasting or less so, depending on whether it is injected in the mares neck or gluteal muscles. And again, treated mares would live with fertile stallions for several years and the researchers would measure the effects of those vaccines in term through blood testing and outcome of pregnancy rates. Study C, would test a kind of intrauterine device. So IUD, this particular one is called iUPOD, that's the trade name. This is a flexible IUD that has been used in domestic mares and in a shorter-term study with ferus mares. And mares treated with those IUDs would be released back to the range and monitored with the help of GPS radio telemetry. The researchers would monitor the behavior of those mares and also their folding outcomes and they would document, yeah, the behavior of non-treated mares as well, or actually mares that are treated with GonaCon. Okay, separately. So those three studies are covered in the Preliminary EA and we receive public comments separately. The BLM will be supporting a proof of concept fertility control study that will not use horses at all, not wild horses, not domestic horses. And this study will test the possibility of a vectored fertility control method. And what that means is that an injection would include adenovirus-like particles that would be taken up by muscle cells, and then those virus-like particles would encode for a protein to be made by those muscle cells. And that protein is what would cause the contraceptive effect. At least that's the hypothesis. So this is kind of similar to how the Johnson & Johnson COVID vaccine works, if you guys are familiar with that. Basically, a small number of muscle cells take in DNA from the injection and then they make a protein that has an effect in the body. And the DNA in those virus-like particles itself does not get incorporated into any reproductive cells. So it's just stays in muscle cells and it's nonreproducing. So this is new is very interesting, but also, you know, a lot of things that we need to learn from. So I'll say it again, this study does not involve horses. It would be a very different approach to fertility control. And that's what we asked for in our request for proposals. We asked for new ideas, new techniques, new methods for fertility control, new possibilities. But it is a new idea and so the BLM is taking this very slowly. The potential advantage of this type of approach is that, it's possible that one dose of this treatment might cause long-term infertility, which as I've said is the goal, it could help management. So let me talk a little more in detail about what this study would do. The central goals are to design and develop a protein that binds very tightly to a molecule called Juno. Juno is this protein on the surface of egg cells that's involved with recognizing sperm. So you have to have functional Juno molecules on egg cells to have fertilization. Otherwise, you don't have sperm egg recognition. And as far as we know, Juno is not expressed anywhere else in the body, except on the surface of egg cells. So the first steps of the project are to design a protein through molecular biochemistry that would bind very tightly to mouse Juno proteins and then to encode DNA that would cause cells to make that protein that binds to Juno, so Juno binding protein. The next, if they can do that. And so all along the way in this research project, there's kind of a, there are steps where if they don't meet this step, the study was interesting, but it's over. And the first step is develop a Juno binding protein that has high affinity for Juno and would stay bound to Juno for a long-time. So the next step would be putting, yeah, I think I said the DNA that would encode the Juno binding protein into a viral vector, then in cell cultures, they would test, so in Petri dishes, basically. They would test whether mouse muscle cells infected with these virus-like proteins or virus-like DNA does express Juno binding protein. Then they would test whether the proteins that are expressed bind to Juno in egg cells. Again, all in Vitro. If that all works, then they would test whether these, the DNA that encodes, Juno binding protein, if it's inserted into mice, female mice does encode Juno binding protein and bind to the Juno on the ovaries of mice that's the study. Those mice would be observed for their fertility as well. So anyway, it's new, it's different, scientifically it's interesting and we're not about to use it on horses, but we're trying to learn from it. It's a possibility. So now I'd like to come back to research that can help us understand better about how to foster healthy wild horse and burro populations and habitat in changing Western landscapes? So how do horses affect the environment that they rely on and how are they affected by the environment? As you've discussed, we know that when horse herds or any ungulates or crickets I guess, are overpopulated compared to available natural resources, they can reduce the ecological resilience to climate change and as you've talked about some AMLs were set decades ago. Well, hypothetically with horses and burros at herd sizes that are at appropriate for local natural resources. BLM Herd Management Areas could be more resilient landscapes that could support high biodiversity. But what water forage and other ecological conditions does the BLM need to plan for and expect, if it's thinking about future AML? Well, to start to get at that, the BLM is funding two new research projects that we received as part of that notice of funding opportunity that may help us address those questions. So first, Utah State will use forecast based predictions of forage and water availability in Herd Management Areas to help inform the BLM about each HMAs all 177 resilience to climate change. It's a modeling exercise. It's going to be based on distributions of horses, some assumptions about horse and burros distributions on the landscape. Also, some empirical evidence from our survey work. We have many thousands of points of locations of where horses have been seen in our aerial survey program, and those will be used to inform that study. The second new project that we're funding in this topic is going to be led by the US Geological Survey and they'll

use a retrospective time series analysis to test how livestock grazing and wild horse densities have influenced a range of ecosystem health indicators. And this will be similar modeling work to what was done to test how sagebrush populations were affected by wild horse densities, but this model will include livestock and also test for a number of other ecological indicators. So in a way this could be interpreted as an assessment of how well does AML do at allowing for these different indicators, which you could say might be indices to a thriving natural ecological balance. Okay, so those are the funded projects or the ones that we're considering funding. We also approved three unsolicited proposals since your last in-person board meeting. And these were approved, but not funded. So the first one that I'll mention is a sociological study led by the University of Oregon. And this study is, yeah, it's structured to document the sociological connections and the decision making process within the BLM Horse and Burro Program. And you know, it's not necessarily transparent to everybody how decisions are made in the Horse and Burro Program. The BLM like, you know, it has a complex organization all by itself. And so the sociology study here's being conducted through a lot of interviews, not only of BLM employees, but also outside in interest groups and people who are just interested in horse and burro management. The second one is led by Aarhus University in Sweden, and that is looking at the effects, ecological effects of horses and burros on wetlands and also their interactions with predators. So that's an experimental study using kind of a natural experimental setup. And it's led by researchers who have already published on things like how burrow digging in some desert ecosystems can expose water and how mountain lions can cause predation or can predate on burros and that happens in different rates, in different habitats. And then the last, new project is a study to look at the microbiome, so the gut microbiota of horses and burros in across a range of different landscapes in the west and the University of California San Diego is looking at that and how, what different bacterial communities look like in the guts of horses and burros across a range of ecosystems. And that last project, I guess I interpreted as scientifically very interesting and remains to be seen what if any management implications that would have. But it's a non-invasive study looking at gut by in feces. Okay, yeah, this last slide is just, this is also in your printed material. It's just a list of papers 2021 and 2022 that have come out of BLM funded research and some other research that's also related to horses and burros and management. I just think it's a pretty substantial list of publications from work that we've supported and there's more to come. So I guess, I would look to you for questions and also whenever we're ready, I'd look to introduce our collaborators from Kingman Field Office and the Humane Society to talk about the local project in the Black Mountain Herd Management Area.

**Discussion regarding BLM Program Research Update:**

Dr. Perryman: I just have a couple of, and I commend you, Paul, that this was a nice comprehensive report. I appreciate it. I really do. And I think the rest of the board does as well. Just a couple of quick questions, so that I can formulate some other questions in my mind. The UIPOD, is that self-assembling IUD, the magnetic?

Dr. Griffin: Yep!

Dr. Perryman: Okay. Okay, good. And oh, you've pulled the, could you put your presentation back up quickly? Could we do that? And I think some of the other board members may need to look at it as well. If you could back up a couple of slides where we were talking about the funded, not the approved, but unfunded projects. Yeah, it would be in the funded ones. Livestock and wild horse influences on vegetation and wildlife in sagebrush ecosystem. Is that the one, I was trying to make some quick notes.

Dr. Griffin: Yes.

Dr. Perryman: I think, you said something about how well does AML do in as far as a prediction goes, and this is a west wide thing. How many, there's not many of them that are at AML.

Dr. Griffin: Correct. So-

Dr. Perryman: I know that's not a question, I mean, it's sort of a question, but.

Dr. Griffin: Well, you guys were talking yesterday about, you know, swapping time for space.

Dr. Perryman: Yeah.



Dr. Griffin: This would be a time and space. And so over time and space, the percentage, the herd size or density as a fraction of AML changes.

Dr. Perryman: Right.

Dr. Griffin: And so not many herds are at AML today, but those have changed over time. So even within a single area, herd size has changed. So if these indicators are closely related and have a discernible signal that is a function of herd size as a percent of AML, then-

Dr. Perryman: Okay, I think I see where you're going. So what we're talking about is a time series since maybe, you know, late-

Dr. Griffin: 2005-

Dr. Perryman: 2005. Okay.

Dr. Griffin: Maybe 2002.

Dr. Perryman: There's going to be a lot of things, you know, AMLs, it's going to be hard to find something that was in AML even in 2005 I think, or you might have a better opportunity.

Dr. Griffin: We were pretty close around 2000-

Dr. Perryman: Yeah. Yeah, okay.

Dr. Griffin: 10, I want to say. So it's come and go. It's come and gone locally in different areas.

Dr. Perryman: Okay, those were my two, my two informational questions, so thank you.

Dr. Griffin: Sure.

Mr. French: Thanks. Thanks, Paul. I wasn't able to get from the study having to do with metapopulation management and I was curious as to what the triggers are for managers on the ground to access distinct populations of other herds and how do we determine, whether or not those herds are distinct, especially in cases where we've got, you know, large movement, long distance movement.

Dr. Griffin: So right now what we're still drawing in when we do analyses of local herds and what we do is we draw on any available genetic diversity monitoring reports that we have for that herd. And in some cases, so we, today we pull hair follicle samples and send those off for analysis. Previous to that technique we were using blood samples and Alzheimer analyses. So for a given herd, we do have, in some cases we have changes in heterozygosity over time. So that as a measure of inbreeding, well there, we also have an inbreeding statistic that comes out of that, but we use heterozygosity as a measure of genetic diversity for local herds. For interconnectedness, we have this 2013 data from the National Academies of Sciences report and we do use this same table. So we tend to summarize, okay, well for this HMA, how many herds does it, how many herds does it have with a fixation index of 0.05 or less? How many with of 0.1 or less? And if there's a herd that has like, extremely highly related, you know, like it's got 50 other herds that we manage that all have fixation index, hairwise fixation indexes of 0.05 or less, I think that's a pretty good sign that it's not genetically unique and it's quite interconnected. If we have a herd where when we look like what's an example, a lot of these purple ones actually aren't BLM managed, but I'm trying to remember what herds have a lot of high, high FST values. There are a couple. But anyway, so if we identify them and say, well, there's very few herds that this herd is highly related to, then that would elevate, you know, concerns or we'd be more cautious about it. So anyway, there's no, when a herd has a heterozygosity level that's lower than a critical threshold value that's defined in our handbook, that is a time when we consider introducing animals from other herds. And the choice of which herds you would introduce from is open for debate. But you know, if it's a herd that's already highly connected to a lot of other herds, then that increases the choice of herds that those animals could come from. Okay, I'm not sure if that answers your question. The other thing is, I'm not

trying to hedge, but we have the researcher who has done the, a lot of these analyses of genetic diversity based on microsatellites and Alzheimer's before that is preparing a manuscript about metapopulation structure in wild horses. And I look forward to that being published, but it's not there yet.

Mr. French: Yeah, thanks.

Dr. Griffin: But those results are consistent with what's shown here. There's a lot of herds that are highly related to each other.

Mr. French: So generally speaking go on from a trigger perspective, I know in on many other species, you know, loss of reproductive viability on the is one of the first indicators that you've got a bottleneck occurring and in those populations where we're depressing fertility already, I'm just wondering how you go about picking up on those triggers as far as a need goes.

Dr. Griffin: Well, we haven't used fertility monitoring as a trigger, as an indicator of inbreeding in most places what we use is heterozygosity level.

Mr. French: Yeah.

Dr. Griffin: Sampling.

Mr. French: Yeah, and that's based on blood samples from everything you're collecting.

Dr. Griffin: Yeah.

Mr. French: All right. So Paul, are there any individual specific herds that are genetically unique?

Dr. Griffin: No.

Mr. French: Okay.

Dr. Griffin: I mean with respect to what, I'm not sure, you know, uniqueness.

- [Speaker] That they're lime red-

- So when we send off samples to be analyzed, one of the results that we always look for is, are there any markers in this population that are not found in other domestic breeds?

- Right.

Dr. Griffin: I would have to scour through all of the reports over all of the years to find one. There may be a couple that have some unique markers. That doesn't mean that the horses are unique, it means that they would carry some markers that are not found elsewhere. But, you know, but most of the reports that come back say, this herd carries no unique, no unique markers that are not found in any other domestic rates.

- Like an isolated herd, this line bread over generations and their-

- For it to be unique, it would've have to have been isolated and for there to have been mutations.

- Right.

- Or for the founding population to have alleles that are not represented anywhere else anymore.

- Good, thanks.

- So an example of that would be like, maybe the curly horses down in Fish Creek, some of those herds down there. Is that, would that be fit that definition pretty well?

- The curly gene there is, as I'm actually being studied, Dr. Catherine in his group have some samples from that, I think that very heard. And they're looking at whether that curly gene was resulted from a local mutation and is unique or whether it was inherited as part of a gene that's also found elsewhere in the world. And I don't know what those results are, but yeah.

Mr. Kuechle: So do a quick time check. I believe Dr. Bechert, we have about half hour left in this agenda items.

Ms. Carlisle: Okay, so after Dr. Bechert, why don't we move on to the next presentation and then save your questions if you have them and we'll wrap them up at the end.

Dr. Bechert: I just had a quick question to clarify something that you said about the immunocontraception. You had said that a mare that dies is sterile for life, which is absolutely true. But I wanted to decouple that from immunocontraception because to my knowledge, mares haven't really died because they were vaccinated and when-

Dr. Griffin: Oh no, no. I didn't mean to imply that at all.

Dr. Bechert: Right and when there's a research project, in fact, if a mare dies for whatever reason, they're not included in the statistical analysis. So they don't count as being infertile. I just-

Dr. Griffin: I'm so sorry. What I was trying to convey was the idea that if a mare is successfully contraceptive because of immune and immunocontraception and she dies for a separate cause from the time that she was treated until she dies, one could semantically interpret that as her being sterile. She got immunocontraception, she had no more foals until she died. And so within that time period, you might say she was sterile because she had no more foals. She certainly had no more after she died. Yeah, so I'm not, I wasn't trying to be cute or anything like that. I was just trying to acknowledge that immunocontraception, if a mare doesn't reverse back to fertility and she were to die before she reverses back to fertility, many people would interpret that as her having been sterile for the remainder of her life. But no, I'm not aware of any cases where mares have died from any immunocontraception and I didn't mean to apply that.

Ms. Carlisle: Okay. All right. Let's go ahead and move to the next presentation.

### **BLM Arizona Wild Burro Pilot Project – The Platero Project**

*Mr. Chad Benson, Wild Horse and Burro Specialist for the Colorado River District in Arizona, BLM; and Ms. Stephanie Boyles Griffin, Senior Scientist, Humane Society United States*

Dr. Griffin: Well, I'm really pleased to introduce Chad Benson. He's a Wild Horse and Burro Specialist from the Kingman Field Office. And if we go to the next slide please? The first map. And he and his team, he's the very much the team, helped us to address a question that it was raised in about 2015. And that is how much effort does it take to dart burros with PZP ZonaStat-H vaccine? So before I turn it over to him, I just want to acknowledge how much work Chad has done on all the facets of this project. From the NEPA planning, the documentation, the trapping, animal handling, animal care, coordinating with Humane Society. Thanks a lot, Chad.

Mr. Benson: Paul said, I'm Chad Benson. I'm the Wild Horse and Burro Specialist for the Colorado River District, located in Northwest Arizona. Three field offices is the Kingman Office, Havasu Field Office and the Yuma Field Office. To put it in perspective, I manage five HMAs in one herd area, and I cover from basically the Hoover Dam, just south of Las Vegas all the way to the Mexico border, almost all the way to Phoenix. So I have a substantial amount of country that I cover. The BLM Kingman Field Office manages, approximately 2.4 million acres public land in northwest Arizona, and they manage or co-manage four HMAs and then three herd areas, which are underneath those HMAs. For this PZP project, it was located within the Black Mountain HMA. And the Black Mountain HMA is located in northwest Arizona,

primarily in KFO that HMA was designated in the 1980s, and it is the largest HMA in Arizona, and it's also home to the largest wild burro population in the United States. The HMA includes the entire range of the Black Mountains with the herd area covering nearly 1.1 million acres of public, state, tribal, and private lands within Mohave County. Within that Black Mountain herd area is a slightly smaller Black Mountain HMA. It's just over 1 million acres, including 567,063 acres of BLM administered lands. And also portions of the National Park Service, Lake Mead National Recreation Area. The NPSs and the BLM co-manage cooperate on managing burros within Lake Mead National Recreation Area. So at the time of the project start, management of the wild burros and the Black Mountain HMA was guided by the Kingman RMP 1995 and the Black Mountain Ecosystem Management Plan 1996, and also the Lake Mead Management Plan. Lake Mead Management Plan and final environmental assessment for Burro Management in 1995. Black Mountain Ecosystem Management Plan set the AML for the Black Mountain HMA at 478 while burros, and as most of you already know, the AML is defined as the number of adult wild burros that can be sustained within the designated HMA to achieve and maintain a thriving natural ecological balance in keeping with the multiple use and sustained yield management of the area. The Black Mountain HMA, AML was established at a level that would maintain healthy wild burros and me vegetation objectives over the long-term. Within the Black Mountain Ecosystem Management Plan, it identified a number of research questions. The document states, and I quote, the resolution of several Black Mountain issues will require research. One specific issue is how might contraceptive methods affect the wild burro populations, and could this be used in junction with, or as an alternative to removal of excess burros? This project also assisted in addressing KFO's, planning needs as it responded to a need, identified in a public meeting in 2015 to discuss ecological concerns in the Black Mountain HMA. During the presentation, fertility treatments were identified as one possibility to reduce wild burro population growth. In 2014, population of burros in the Black Mountain HMA was estimated between 1,517 and 1,827. And this was identified in a report estimated abundance of wild burros surveyed on Bureau of Land Management lands in 2014, Griffin 2015. There you go. Thank you, Paul for that. In 2019, the population of wild burros in the Black Mountains was estimated at approximately 2,868 or somewhere between 2,746 and 3001 total wild burros. For this pilot project, the main area that we picked was an area that was south of Highway 68, which Highway 68 is kind of a dividing line that is between Kingman and Bullhead City that runs east and west. We determine initial trapping efforts for wild free-roaming jennies was limited to the area south of that road, and this seemed to be where the largest concentration of burros was at the time. And that was based on field observations and that 2014 population estimate. However, BLM understood that in subsequent months, treaty burros may wander under other portions of the HMA. The contributing factors in selecting this specific area for this project was due to the burro population and the things that the Humane Society of the United States was looking for, which included successful data acquisition, animal accessibility, such as the area size, the terrain, the disposition of the burros, whether general or wild, location accessibility and trapping feasibility. And for this project, this area seemed to be the area that best fit the needs of the Humane Society. So with that pretty much describes the location of the HMA, and at this time, I could turn it over to the Humane Society of the United States, Dr. Stephanie Boyles Griffin, to discuss the project in more detail with you.

Ms. Boyles Griffin: All right, and so I'm going to share my screen. Share. And I'll start the slideshow from the beginning. Okay, can you see that, okay? That title slide? Okay, so good morning, everyone. As Chad and Paul said, I'm Stephanie Boyles Griffin, and I serve as the Senior Scientist in the Wildlife Protection Department at the Humane Society United States. I'm not a doctor, I hold a Master's of Science in Environmental Science. I also serve as the Science and Policy Director for the Botstiber Institute for Wildlife Fertility Control. And on behalf of myself, my colleague Grace Kahler, who serves as the Wildlife Field Manager for the HSUS and our team. We thank the Advisory Board for inviting us to share the highlights and preliminary results of the Platero Project. This is a pilot project initiated by the Humane Society of the United States, in partnership with the BLM to assess the logistical feasibility of using the immunocontraceptive ZonaStat-H to manage a wild burro population in an open western landscape in northwestern Arizona. So the presentation this morning will begin with some just background information on previous Wild Burro Fertility Control Research, and then we'll share the purpose, goal and objectives of the project, describe the study site, herd and study design and project activities, and then share the preliminary results. And then last, but not least, we will acknowledge everyone who made this project possible, including Chad and Paul. As many of you know, the safety and efficacy of the immunocontraceptive porcine zona pellucida. Sorry, I skipped over, also known as PZP under the brand name ZonaStat-H is well established in wild horses, but up until now, only one study on the use of PZP and burros had ever been conducted. In 1996, researchers found PZP to be effective, safe, and reversible and wild female burros on the US Virgin Island of St. John. It was 100% effective on treated female burros, while 54% of the untreated control group became pregnant during the same time period. This study also demonstrated that wild burros could be accessed for remote delivered vaccines, but was conducted in a closed island system where the study jennies were highly approachable and accessible. So in the past, Wild Burro

Fertility Control Research has not been a priority for the BLM because compared to wild horses, there are far fewer populations of wild burros on public lands. Wild burro population growth rates are slightly lower than horses. And adoption demand is historically higher for wild horses, which means there are far fewer wild burros in government holding facilities. So to help build a scientific foundation for incorporating immunocontraception into BLM's Wild Burro Management Programs. In the summer of 2017, the HSUS partnering with the BLM began a pilot project to determine the applicability and feasibility of using ZonaStat-H to manage wild burros living in the Black Mountain Herd Management Area in northwestern Arizona. The pilot project was supported by an anonymous HSUS donor and a supplementary grant from the BLM and is named for the Spanish Nobel Laureate Juan Roman Jimenez's beautiful book about a friendly faithful burro named Platero. The goal of the project is to provide the BLM with current science-based data that will aid while burro managers in determining how best to incorporate fertility control into their ongoing Wild Burro Management Programs on public lands in the US. And we summarize the project's objectives as three questions. Number one. I'm sorry, hold on just a moment. Can habituated burros be treated initially via bait-trapping and then remotely treated via bait station, bait-trapping or opportunistic darting? To answer this question, we measured the proportion of originally treated jennies who were retreated, and if the retreatment occurred using bait-trapping, bait station or opportunistic darting. Number two, what are the effects of ZonaStat-H treatments on individual jenny foaling? To answer this question, we collected data on the number and proportion of treated jennies foaling each year and compared it with the same data collected from untreated controlled jennies in the same herd. And then three, what are the effects of PZP treatments on the health and social dynamics of treated burros? To answer this question, we identified individual jennies, both treated and controls and visually examined the jennies and recorded data on general health, injection site reactions, body score conditions, group membership, and mating behavior. The initial project design began by working with the BLM, as Chad said, to identify a suitable project site. And after evaluating several wild burro HMAs, we selected the Black Mountain Herd Management Area because as Chad mentioned, the BLM had successfully bait-trapped wild burros there in the past. And the burro population was known to be highly approachable and accessible. And since Chad has already provided you with information on the study, area and the herd, I'll move on to our methodology. During the first year of the study, the goal was to bait-trap between 75 and 150 adult female wild burros. Some captured jennies would be randomly assigned to two treatment groups and then freeze-marked treated with ZonaStat-H and released, while others would be randomly assigned to the control group and would be marked and released. So from August, 2017 to April, 2018, the field team worked 11 bait-trap sites and captured a total of 592 burros. The BLM suspended trapping operations in April, 2018, at which point, we had captured 101 eligible unhabituated jennies. 31 of our captured jennies were randomly assigned to control group A and 70 were randomly assigned to treatment groups B and C. Captured study jennies were freeze-marked with a unique identification number on both hips, photographed and had hair samples taken for genetic analysis. The group A jennies were then returned to the range. The group B jennies received a primer dose of ZonaStat-H by hand-injection, and then were released into a holding corral held for a minimum of two weeks, given a booster dose of ZonaStat-H by hand-injection, and returned to the range. The group C jennies received the primer dose of ZonaStat-H by hand-injection, and then were returned to the range. And then two weeks later, field staff worked to locate and administer the first booster dose of ZonaStat-H by darted. So along Historic Route 66 in the old gold mining town of Oatman were a small habituated population of wild burros live, and they solicit food from tourists. Since this small habituated burro population was not representative of the large unhabituated burro population that the BLM manages in the Black Mountain HMA, we decided not to include them in the study. However, to contribute to the local community's efforts to minimize burro vehicle collisions and other human burro related conflicts. The HSUS and the BLM jointly agreed that we would treat all habituated Oatman jennies with ZonaStat-H through the duration of the project. And since these habituated jennies were well-known to Oatman residents, they were not freeze branded. Instead, these jennies were identified by name, assigned a number, and photographed for future reference. And they were located and darted outside of Oatman with a primer dose of ZonaStat-H, and then eight weeks later, we darted them again outside of town with a booster dose of ZonaStat-H. And as of August, 2021, all eight group D Oatman jennies had received their fourth and final booster. With a capture phase, the project completed in May, 2018. We began focusing on administering initial boosters to group C jennies. Administering annual boosters to both group B and group C jennies, and then conducting intensive ground observations. Before I began sharing the preliminary findings and results of the study. Let me preface this by just reminding everyone that these are preliminary results and are intended to provide the Advisory Board with a preview of these results prior to future peer review and publication. So with that in mind, I'll start with booster efficiencies. As you can see on this graph between August, 2017 and August, 2021 of the 70 unhabituated treated jennies in our study, over 50% received all four ZonaStat-H boosters. Also as anticipated, we observed a reduction in efficiency over time as our study jennies responded to the darting process. But it's important to note that, despite that, we were still able to administer fourth boosters to more than half of the previously treated jennies in year four. We also collected data on the three



methods used to administer annual boosters to the group B and group C jennies. Jennies were darted near roads from field vehicles or identified from the field vehicle approached on foot and darted. Throughout the project, if group B or group C jennies couldn't be approached within a safe darting range by field vehicle or by foot, then bait was used to lure and dark target jennies from the field vehicle. Bait could include salt, mineral or weed free hay in areas that burros utilized during their normal movements throughout the HMA. And as you can see, the regardless of treatment group approaching jennies on foot was the least used method for administering annual boosters to our treated study jennies. The use of the field vehicle with or without the use of bait to lure them in, was the most frequently used method. We also collected data on time spent administering annual boosters to group B and group D study jennies via darting. So time spent darting animals was defined as the length of time from when an animal was identified as a target to when the dart was recovered. Unsuccessful dart time was defined as the sum of time spent attempting to dart a target jenny, from the time the target that jenny was identified to the time when darting efforts were suspended. And as you can see from this graph, the average successful time steadily decreased from 2.56 hours when we were administering first boosters to our group C jennies to 1.06 hours when we were administering fourth boosters to both our group B and group C jennies. While the overall darting effort per wild burro, jenny remained relatively constant. We also observed no significant differences in delivery distance by booster delivery method or treatment group. The mean distance was 27.4 meters. So the overall takeaway message is that we were able to remotely retreat a high proportion of our previously retreated jennies, primarily from the field vehicle and at a range that did not exceed the limits of a dart projector that's typically used for administering ZonaStat-H remotely to wild horses. And the time that it took to successfully dart previously treated jennies decreased over time. As discussed previously, we also conducted intensive ground observations to determine and describe the direct effects of ZonaStat-H untreated while burro jennies, including but not limited to foaling rates, body condition, injection site reactions and general health. Since most of the study jennies were pregnant when they were incorporated into the study, we did not expect to observe significant changes in folding rates after the administration of the initial primers and foals first boosters. However, 24 months following the release date, we observed the beginning of a dramatic reduction in folding rates in group B and group C jennies. As you can see here, the average foaling rate in control jennies in group A was over 73%, while foaling rates for the treated jennies in group B was 0 and in for group C was 4.9%. These findings mirror and extend the previously published results from the study conducted on wild burros living on St. John's were researchers observed that no PZP treated burros produced foals starting at 12 months after receiving a primer and booster dose of PZP. Variation and booster delivery didn't appear to affect contraception and we found no significant differences in vaccine delivery timing for group B and group C jennies that received all four boosters. So the overall takeaway message here is that administering annual boosters appear to sustain contraception in our treated jennies over time. We also monitored for and documented any injection site reactions in treated jennies. When observed injection site reactions were graded using in an assessment rubric and any resulting range of motion limitations were assessed using an American Association of Equine Practitioners Lameness Scale. The majority of treated study jennies did not develop injection site reactions and or range of motion limitations, regardless of treatment group or treatment. The mean rate was 16.5%. All the observed injection site reactions appear to resolve on their own regardless of score or type and without veterinary medical intervention. And did not appear to affect contraception. We did observe a higher injection site rate in range of motion limitation rate among some group B jennies following the initial administration of their primers. At the beginning of the capture phase of the study. As described previously, the group B treatment jennies were held for two weeks prior to receiving their first booster and then were released back onto the range. ZonaStat-H is a thick emulsion and we believe the reduction in physical activity during this time may have contributed to the higher injection site, reaction rate and range of motion limitation rate. And we observed in the group B jennies in that time of the study. So we resolved this by incorporating daily exercise into post-primary administration protocols. We also collected data on body score conditions, condition scores for our control and treated jennies using a scale of 1 to 9 with five being ideal, as you see here. We observe no significant changes in average or individual body scores for groups A, B, and C. The four year average for group A was 4.78. It was 4.96 for treatment group B and 4.92 for treatment group C with no major variations between years. Throughout the study, we didn't observe any notable changes in overall health and behavior in our treated study jennies, but available information for monitoring and tracking social behaviors for wild equids revolves around wild mares and did not apply to jennies social dynamics. So it was difficult to categorize and measure changes in behavior during our study. There's also a conspicuous lack of available resources for burro specific attributes for individual identification. And for that reason, my colleague Grace Kahler is in the process of creating a consolidated toolkit of resources and identifiers for wild burros for others to use in the future. So to summarize our preliminary results, a high proportion of wild unhabituated jennies in the Black Mountain HMA can be successfully retreated remotely with ZonaStat-H. And as expected, ZonaStat-H significantly decreased foaling rates after 24 months. And the successful administration of additional annual booster sustained contraception, we observed injection site reactions, but they resolved

without veterinary intervention and did not affect contraception. There didn't appear to be any detrimental side effects associated with treating wild burros with ZonaStat-H. But in the future, if the BLM plans to capture, treat, and hold wild jennies for two weeks before administering initial boosters and releasing them, they should incorporate daily exercise into the post-primary administration protocols to prevent or reduce rates of injection site reactions or range of motion limitations in treated jennies. So last, but not least, I would like to thank everyone who made this project possible. Starting with our anonymous donor without their generosity and support, the Platero Project would not have been possible. We also thank the BLM for financial, technical and direct support, specifically Chad Benson, Amanda Dobson, Emily Hibbard, and Dr. Paul Griffin. We also thank Dr. Allen Rutberg and project veterinarians, Dr. Jann and Dr. Anderson and the residents and business owners in the town of Oatman. And finally, I want to thank Grace Kahler. Grace did all of the heavy lifting that made the project possible, not me. And the BLM owe her a debt of gratitude that we may never be able to fully repay for her tireless efforts. Thank you, Grace. And with that I will take any questions you might have.

**Discussion regarding the BLM Arizona Wild Burro Pilot Project and The Platero Project:**

Dr. Lenz: So looking at your reaction rate, I mean, if you look at the four sites where you would inject a horse, their neck, their brisket, their semiosis, tendinosis, and gluteal, the gluteal is by far more reactive because it's a thin muscle layer with a lot of fascial planes and you tend to hit the periosteum or the pelvis. So why, especially in the captured horses, did you not inject them in a larger muscle mass?

Ms. Boyles Griffin: That might be a question that would be better answered by one of our project veterinarians, but this is generally the protocol that is followed for the BLM. So we were simply following procedures that were the standard operating procedures for injecting ZonaStat-H for this project.

Dr. Lenz: Yeah, yeah, we saw the same thing at one of the collection sites. I'm just curious how that recommendation came about in the BLM because of those four sites that is the-

Ms. Boyles Griffin: The other thing, yeah, the other thing, Dr. Lenz that I would say is I believe that the EPA label for the use of ZonaStat-H may actually require that the injection be made in the hip and gluteal muscles as well. Now that I'm thinking about it. So that's a really great question and I can dig in and do a little bit more research into that and get back to you about that, if you wish. But I think that's also one of the main reasons that we did both the hand-injections and the dart delivered administrations in the hip and gluteal muscles is to comply with the EPA label.

Dr. Lenz: That's interesting-

Ms. Carlisle: I have a little bit more on that, the EPA label does recommend administration in that gluteal muscle. But also the reason for that is that previous research had shown that most injection site reactions were occurring in the neck when given with probably the adjuvant that was used with that PZP.

Dr. Lenz: I think the adjuvant, if you stalled those animals, you perhaps would have that, but in general equine practice, we just don't put it in the gluteals because that's where we get abscesses and that's where we get reactions. And 16% would be really high, really high.

Ms. Carlisle: There was research done, now I'm forgetting where, not in the United States, but with donkeys about injection-

Ms. Boyles Griffin: It's the Saint Kitts. It's the Saint Kitts study.

Ms. Carlisle: Saint Kitts, that's right. And there were injection site reactions and adjuvant studies happening in burros. So that may have driven some of that-

Dr. Lenz: Well, the reaction's a big deal.

Ms. Carlisle: It is.

Dr. Lenz: Various adjuvants cause more reactions. But I mean, we saw the same thing in collection the other day and it

just, you know, from a horse veterinarian perspective, it was actually about 50 years. I just don't see horses or donkeys or burros or mules inject in that area, so it's surprising.

Ms. Carlisle: Also the protocol for darting animals that was developed by now, I can't remember, I'm sorry. But when you learn about remote-delivery and capture certification protocols, which some people will become certified, not just in the administration of a fertility control vaccine, but also in that broader context of delivering tranquilizer-

Dr. Lenz: You sure inject lowering the leg there, I'm talking about the gluteals up on the crew.

Ms. Carlisle: Right. But the reason that the backend is targeted is for risk management when you're actually remove-

Dr. Lenz: Sure, I understand that, but there's a difference between lower and the high leg and up in the gluteals, right. There's a huge difference. Okay. I'm just curious.

Ms. Carlisle: And then Stephanie, I had a question, but I see Bryant looking at me.

Mr. Kuechle: I was just wanted to check-in. So we are at a break time and I know it sounds like there's some questions and comments. You know, Susan mentioned she has a lot to say. So if for the board's consideration and we may want to take a break and return if the speakers are willing to stick with us. We'll do a 11 minute break and come back at quarter till.

**[BREAK]**

Mr. Kuechle: Okay, let's pick up where we left off. We just want to, we're a little bit 15 minutes or so ahead of or behind, but I think that's okay. We'll make up some time. We just want to make sure we get to our lunch hour at the appropriate time, so that we can have the time to return for our public comment period today, which is at 1:30. So we'll pick up where we left off. Any further discussion or questions from the presenters?

Ms. Carlisle: Stephanie, I had one question because the darting was occurring because some, well to Chad as well, because some of the darting was occurring near the town of Oatman and because Route 66 goes through that area, I would assume you had some interaction with the public or needed to have some preliminary interaction with the public to explain what was happening. And if you could talk about some of that process, because it looks alarming to be out around these animals with large equipment. So just wondering what the front end work was that maybe was necessary for a project like this?

Ms. Boyles Griffin: Might be good for Chad to start because as he said, there was a lot of public engagement before this project was even discussed happening. So might be good for Chad to kind of set the ground and I'll tell you what some of what we did.

Mr. Benson: Yeah, it was in initially through the NEPA process, you know, doing the NEPA, putting the NEPA out for input and then also, you know, as we went along, just engaging all the stakeholders, you know, all the pertinent players that are out there in the local community that have an interest engaging them in conversation and discussing, you know, that project was going to be taking place and just what exactly we were going to be doing.

Ms. Boyles Griffin: So what I can add to that, and if some of you have additional questions along these lines, and I don't answer them fully today, I can certainly refer them to Grace, but she did a lot of, again, the heavy lifting on that. We had a fact sheet that we had in the field vehicle at the time the field vehicle was conspicuously marked, so that they know who we were, what we were there to do. And so it was a lot of face-to-face meetings with the public when we were in and around the town of Oatman. And Grace did a lot of that at the beginning of the project and throughout the project. So that was some of what we did is just constantly being there and being approachable and accessible to the public for them to come up and ask us questions and dispel some of the myths or misconceptions about what it was we were or were not doing that they may have in their minds. And just to educate them on that. So a lot of what we did was just public education and awareness on what we were doing and why. And that was ongoing. It wasn't you did it once and you were done. That was constantly and we were constantly changing how we did it. We were adapting as new people moved in

and out there. We have tourists, new tourists coming into town all the time and asking some of the same questions that others had in the past.

Ms. Carlisle: Thank you. Dr. Perryman.

Dr. Perryman: Do you have any kind of metric at all on how many individual that you encountered, you know, encounters is, did you guys keep any records at all?

Ms. Boyles Griffin: Yes, so obviously for the purposes of this presentation, I wasn't able to get into that. But again, I can follow up with you after the meeting and share some of the data that we have on burros encounters. Long story short, we encountered a lot of unbranded nonstudy jennies that we could have darted had they been part of the projects. If that's what you were getting at Barry?

Dr. Perryman: No, pardon me, I probably wasn't clear. How many human encounters?

Ms. Boyles Griffin: Oh, human, I thought you meant-

Dr. Perryman: Human. Yeah, no human encounters. Can you have-

Ms. Boyles Griffin: I don't know that we were-

Dr. Perryman: Any ideas how many human encounters you may have had in this whole effort?

Ms. Boyles Griffin: I don't know. I don't know that we kept data on how many times a member of the public in Oatman or anywhere around Route 66 or people that were residents of Kingman in the area of that Herd Management Area that we were working. But I'll certainly ask Grace about that. But I feel pretty confident she was not keeping data on the number of people that talked to us or engaged us in any way and then wrote down what the question was, so that we could also qualify those encounters. But we did keep a lot of data on how many burros we encountered above and beyond our study jennies.

Dr. Perryman: But the reason I ask you is, if something like this is going to be implemented, you know, in other places that's a manpower issue that the bureau and the Forest Service is going to have to deal with. I mean, quite honestly there, it, I mean, it may require an additional, you know, position even to just handle the volume of human encounters inquisitive minds and those kinds of things. So, okay, thank you.

Ms. Boyles Griffin: I think Chad does a really great job and he is so accessible to people in Oatman and around the Herd Management Area when there are any conflicts of any kind or questions about this project or anything. And I think that's one of the great things about Chad's position there is he really is sort of a mediator for all things wild burros for the BLM there. And he's well-known and trusted by members of the community.

Dr. Perryman: Thank you.

Ms. McAlpine: Hi, Stephanie, nice to see you, again.

Ms. Boyles Griffin: Hi, Susan. It's great to see you again too.

Ms. McAlpine: But Dr. Perryman, I can validate that at least one resident of Mohave County had contact with each of these individuals. So you can count one contact times three times two, at least so may, anywhere between four and six individual contexts depending on how you like to run your math anyhow. And I personally really do seriously want to thanks, Stephanie and Grace, who spent a tremendous amount of time as a young female out in the most remote areas in a vehicle by herself, darting a horses, burros. It was just amazing to see how much effort went into this, particular project and I live in Mohave County, so I know how remote it can be there. It was significantly remoter, if that's a word, than I had experienced in 20 years living there. So thank you, Stephanie and Grace and thank you Chad for, you know, bringing what you go Dorothea and I into another component of what was going on in Mohave County with the burros and hosting

us in a roundup, answering our questions, honestly, having a sense of humor for neophytes out there and really expanding my education as I sit on this board as a humane advocate and saying that my priority for the first three years I was appointed here was, to expand my knowledge of what was happening with Mohave County burros, which we've already stated the largest in the country. So thank you all, I learned a lot and really appreciate, you know, the trust both of you put in me as an unknown entity as I learned. So thank you very much. Oh, I'm going to kind of throw out the elephant into the middle of the room. Paul, your presentation about fertility control and studies was really well done. A little bit over my head, but that's okay. It's not over several other heads that is going to address future needs. And I'm going to pick up on kind of a general thread that we've talked about the last couple of days in that we're in a crisis situation and the US public is encouraged by many humane organizations to spay and neuter dogs and cats in this country. It is not considered inhumane by any stretch of the imagination. One of the things that we talk about in, I particularly coming from the sport horse industry and actually my husband from breeding quarter horses, one stallion can impregnate multiple mares. Those mares each have one full and you don't have to answer any of this, this is just me spouting. The US sport horse population, includes a significant population of happy, successful geldings, living long happy lives as geldings. When it comes to sterilization of burros or our wild horses. It is my hope that mares and stallions selected for sterilization would be based on desirable qualities for healthy herds and perpetuity, so it's not just random. And I already said that testings and studies provide information for the long-term, which is also necessary. But again, we are in a crisis situation and I've been known to say, can we just do it and solve the problem? And Chad, I was talking to somebody from another state in a position similar to yours with burros and he mentioned that this year alone, he has had to euthanize three jacks because of severe injuries in fighting for dominance and breeding rights. I had to say that the right way, so I didn't get in trouble. Have you seen anything like that in Mohave County?

Mr. Benson: Aside from just the normal behavior that burros exhibit out on the range, you know, their typical fighting. I have not observed anything that I could specifically say that yes, this is a direct result of an injury that was a direct result from the burros fighting that deemed euthanasia. There's a lot of other things that go on burros getting hit by cars in my areas. You know, that's probably the most significant injury that I see that would require a burro to be euthanized.

Ms. McAlpine: And not in, kind of in response to that, I think during the gather we talked about the ADOT study that was coming out and hadn't been published at that time. I actually got it and read what, 26 or 28 pages and there was one, I think five word mention of burros in Mohave County and I was really disappointed, but I did get it and I did attempt to read it. So thank you all very much. That's all I have to say.

Mr. Kuechle: Great, thank you. I think, so we're coming up at the top of the hour, so maybe we can continue on to our next agenda item to allow, make sure we have the opportunity to hear and have good discussion there. So if certainly there'll be opportunity to have conversations with these gentlemen and probably Stephanie in the future in remaining today. But let's go ahead and move forward.

Ms. Carlisle: Thank you very much, Stephanie for joining us via Zoom and Chad and Paul for your presentations. Really appreciate it. I'll let Stephanie sign off. We are going to have a presentation now about the BLM's Adoption Incentive Program, an update about it.

### **BLM Adoption Incentive Program Presentation**

***Mr. Paul McGuire, Acting Off-Range Branch Chief for the WHB Program, BLM***

All right, well, good morning members of the board. I'm Paul McGuire, I'm the Acting Off-Range Branch Chief for the National Wild Horse and Burro Program. It's been good to have an opportunity to get reacquainted with many of you here in Phoenix this week. And to meet some of you for the first time. We wanted to make some time during the meeting this week to talk about the Adoption Incentive Program. I think, hopefully, you're all aware that the, AIP has gotten a fair amount of attention the last year, year and a half. It's certainly been a considerable focus of our team at headquarters and coordinating with the field in addressing some of the issues and concerns that have been raised in the public. And I know the members of the board have had a focus on that as well. And so hopefully, this presentation will be informative to you. I think, as you all are aware, during some of the earlier sessions, we did touch on some of these issues, during some of the subcommittee discussions, the program overview, the Ms. Waddell presented as well as during discussions about the board recommendations, there was one in particular that addressed the AIP. So we'll be covering some of that same



ground, but it's a fairly brief presentation we have, leaving open ample time for board members to ask any questions or discussions that may be warranted. So if we can go to the next slide or the first slide actually. So just briefly, some of the background that you all are probably very aware of the Adoption Incentive Program in its current form was launched in 2019. And when we say launched, this AIP is really just the latest iteration in various incentives that the program has offered over the course of many years. So offering incentives is a sort of a way of inducing people to consider adopting animals is something that program has implemented in one form or another under the authorities provided through the regulations, the governing adoption program for quite some time. So that's an important point to make is that the AIP in some respects is not entirely unique. The provisions of the AIP are innovative, but in terms of the overall objective, which is to encourage folks to adopt isn't entirely unique. There have been other programs in the past. So the basics of the program is it offers individuals \$1,000 to adopt and title a wild horse and burro, specifically an untrained wild horse and burro, the program is focused on untrained animals in particular. And then an important point to make is that under the program, AIP adopters have to meet the same standards to adopt as any adopter. And so as we've been stressing the point, the AIP is part and parcel of the adoption program as it exists. And so the same rigorous requirements to adopt an animal apply under the AIP and then the twin purposes of the AIP are really to attract new adopters to the program or to draw previous adopters back into the program to participate in the program with the objective of increasing overall private placements, which as you well know, is a critical outlet supporting the BLM's on range management efforts as every animal that is placed into private care is an animal that doesn't have to be held in off-range corrals or pastures at expense, which can offset our ability to do the important work on the range. And then some stats at the bottom there that I think are important since the AIP came into effect, we've adopted over 12,000 animals, as you can see there in the last, what has it been, two and a half, almost three years, which based on our formula that we use translates to about \$340 million in savings. That's lifetime savings. So that number of animals, 12,120 animals at approximately \$28,000 for the lifetime of that animal. Equates to about \$340 million in savings. And that's over about a 25 year timeframe, just for reference there. So pretty considerable. All right, so some of the recent changes that you all are probably aware of, it was July of last year that agency leadership came forward and informed the public that we are aware of many of the concerns about the AIP and we're interested in examining approaches to address those concerns. And so beyond announced plans to make some revisions to the AIP about six months, we worked pretty intensively on revising the policy and that policy was issued in January of this year in the form of Instruction Memorandum '22-014. Each member of the board as well as members of the public do have thank you. Do have access to that link, so you can access that memorandum directly. The principle changes that came about with that new IM is that it went, instead of splitting the incentive in two as it was originally designed, \$500 basically shortly after the time of adoption, \$500 after titling, it went to a one-time payment of \$1,000 at time of titling. And that was to actually address a couple of issues. One was to minimize the instances of individuals, getting the first \$500 and then returning animals. That didn't happen a lot, but it did happen. And so that was one objective. The other was, of course, to incentivize folks in getting the title of the animals that was a strong purpose of that change. Another change was accelerating the timeline for the mandatory compliance inspections on AIP animals. Compliance inspections for AIP animals had always been mandatory, but it had been done on a timeline that traditionally had been done for adopted animals, which might not occur until sometime late in the one year adoption period. The revised policy accelerated that, to ensure that a mandatory compliance inspection was done within the first six months. And the effect of that was basically to result in AIP animals having two compliance inspections because you'll have that first com compliance inspection in the first six months, and then at time of titling, you effectively have another compliance inspection, either by a BLM official or as we'll get to by a veterinarian. And that is the third bullet there is that the other revision was that in order to receive the incentive payment when applying for title under the AIP, that title certificate would have to be signed either by a veterinarian or a BLM official. Whereas the general rules allow for any number of other competent practitioners to sign off on the title eligibility in order to receive the payment. It had to be one of those two. And so that effectively constitutes a second compliance that's conducted on each AIP animal. And then finally, one of the principle changes was to set a minimum fee of \$125 for any animals adopted under the AIP. BLM authorized officials have delegated authority to offer animals a reduced fee and that can still happen that authority still exists, but if an animal's being offered or adopted under the AIP, the minimum fee is \$125 under the new policy. All right, so this is something many of the board members may or may not be aware of, but earlier this year, BLM engaged in some pretty aggressive outreach. We got together with, or we pulled together a group of stakeholder groups who were known to the agency to have an acute interest in wild horse and burro management issues. We tried to bring together kind of a diverse set of viewpoints to offer some thoughts and ideas for BLM to consider some further revisions to the AIP. These meetings weren't exactly open to the public as this type of board meeting is, but we do want to stress that the agency remains open through forums such as the stakeholder outreach that we remain open to input from members of the public directly with any ideas and thoughts they have and we've heard many this week, so we're very grateful for that. During our

three workshops that we held with stakeholder groups earlier this year, we did have some side boards for our discussions, which was we wanted to hear ideas that BLM could actually implement. We know there are a lot of ideas out there for how the program might be revised or modified, many of which would require statutory changes. That's obviously outside of BLM's ability to influence that falls to Congress. So we wanted to have discussions that were most productive. And so we asked participants to consider ideas that we could implement under existing statutory or under existing statutory authorities or regulatory authorities. And we got some good ideas. There were at least half a dozen ideas that sort of grew out of those workshops that BLM is currently contemplating and considering we have some scheduled briefings with our leadership later this month to look at those in more detail, give some guidance from them on the direction that they would like to see the program go. And once that sort of is fleshed out, then there'll be more to come on that. So that's kind of where we're at with the AIP and that is the end of this presentation. So actually we can address any questions that the board may have.

**Discussion Regarding the BLM Adoption Incentive Program Presentation:**

Dr. Perryman: Okay. I'm starting the board is working on some recommendations that are going to address exactly what you just talked about some of the ideas that maybe have come in from stakeholder groups. Can you tell us what they are?

Mr. McGuire: One of the recommendations that the board itself made during the last meeting and discussed earlier this week, concerned possibly moving away from a cash incentive to some other form that was an idea that was discussed during some of our outreach sessions that we spent a fair amount of time on. And so that would, that's one of the concepts that we're looking at and we'll be discussing with leadership. There are a number of others. I'm a little hesitant to get out in front of our briefings with leadership at this time. But I would say there probably wasn't a whole lot that came up that would be foreign to what members of this board have proposed or heard members of the public propose. It was a great opportunity to bring those folks together and really have some civil discussion about some of those ideas. So I don't think what eventually comes of it will be a tremendous surprise, but I am a little, it would've been nice to be quite honest with you, if we could have moved this along a little quicker before this board meeting, so they could be a little more forthcoming with you. That was certainly what we'd hoped. But we probably need to have a sit down with our leadership before we come too, you know, too forward with many of those details at this time.

Dr. Perryman: So you need to talk to leadership to tell before you can tell us what your stakeholders told you?

Mr. McGuire: Well, I will tell you this, it's certainly not a secret. The stakeholders themselves, I think have been public about what those discussions were they weren't contested meetings by any means. I guess, I can touch to some degree. Some of them had to do with possibly limiting participation in the AIP that was a thought that came forward. So as it is now, you may see individuals who repeatedly participate in the AIP and perhaps once receiving title, they may sell those animals on the private market. And that's something that a number of folks have voiced concerned about. And so one of the recommendations, I hate to say recommendation, but one of the ideas that came forward was if individuals were limited in the number of times that they could participate in the AIP that could potentially address that outcome. So that was another thought that came forward.

Dr. Perryman: That's always been a big concern of mine. And I think the board as well and our stakeholders is, and I'll just say it out loud, we've got to stop people from trying to gain the system. I mean, that's, it's not something that is, you know, it's not the tail wagging the dog and the whole program, but it does happen. I mean, I do believe that it happens, it appears to be happening and I think certainly the board has had some discussions about attempting to try and remove any incentive or at least make it much more difficult. I don't know if you can ever keep people from gaming the system or attempting to game the system in anything completely 100%, but without doing away with all the good, you know, the good stuff associated with it. But it would be helpful, you know, I mean we hear from our stakeholders, I assume that they're the same stakeholders that are talking to you as well, but it would be nice, if we didn't have to guess about what our stakeholders are thinking and just kind of compare lists. So I'll leave it at that.

Ms. Carlisle: Well, because I also sit on this board and wear another hat, which was that I was able to participate in some of those meetings or hear from the advocacy community that participated in those meetings. I can list that a few of the other things that people are discussing in earnest as offering to the BLM as things to consider. And I want to be very clear that it is understood that there are some parameters that will make it, so that something just can't happen or can't happen immediately without statutory changes, et cetera. So please take these as they are, which was the brainstormed type of

suggestions also included besides those discussed or mentioned by Paul. And again, some of these may not be attainable and it just is what it is, but that perhaps if there was a separate sort of title that you received, if you were part of the AIP program that was a red flag to sales barns, et cetera, that basically did not give you the ability to, you know, pass it off to these potentially not ideal endings to extend the time of titling, to have a system to track the bad actors, so that it is known, this is a person that we've had a problem with, we're done. And to develop more positive approaches to collaboration and support of the adopting community. So that issue of inability to find resources to assist you with your care and training and whatever whatnot might come with a Mustang is the community of support is built around it. And to Dr. Perryman's point, there is always a great interest in all of the front end work being done, so that there aren't the loopholes. So instead of trying to figure out ways to repair the backend holes and rescue a situation more preventative. So those are the types of ideas, again, and I, for folks watching, I know it's not complete, but those were the directions of the types of discussions that have been occurring in the advocacy community and that have been suggested forward. So if that's helpful at all. Ms. McAlpine.

Ms. McAlpine: Excuse me. I guess to follow up on that, a chatter is really clear about the fact that this board is to make recommendations, good recommendations for healthy herds and environments to BLM. And we should not be getting information about critical suggestions from stakeholders in this manner. If a report is done and you have the report and it needs to be confidential, then we should have that and know that. We spend a significant amount of volunteer time discussing in subcommittees what we are hearing from stakeholders, what is happening on the ground. We have to balance that with a significant, really significant number of social media misinformations that come out. And it would be very helpful to us as we debate and discuss and re-debate and re-discuss, if we have the correct information that would help guide us in making recommendations to you. And I'm not picking on you, I just want to put that out. With regard and this goes along with that. With regard to the demand that we hear, I hear, and I'm sure other people hear that BLM dropped the incentive portion of the AIP program. As I said, I've heard significant complaints that sound valid, but provide me with no detailed or identifying data. And every time I get them, I shift them off to where they're supposed to go and tell them that they need that information. So what I need from stakeholders and is specific information, so that I can send them in the right direction to resolve that and to document that. My major concern and it builds on something Dr. Perryman said yesterday, I think, in dropping this incentive, if that's what happens, is that we have now taken an incentive to many well-intentioned good people who adopt horses and keep them from long periods of time. And we're essentially punishing them because of some really bad actors who manipulate the system. My preference would be that those who manipulate the system, abuse the system and abuse horses along the way, be investigated on a really timely basis and whatever laws we have on the books that they are prosecuted to the nines. And I think one of the suggestions I heard was obviously to take those people that work in conjunction with relatives to buy and adopt numerous animals sometimes in several states. And I kind of used that as an example yesterday, prosecuted and taken out of the program in that we don't punish the good people because we complain about it as human citizens too. Why punish us and let the bad guy go? And that's the same philosophy I have about that. So thank you for listening.

Mr. French: You know, I'm going back to Director Corsey when he was, I remember him talking initially to this board about that proposal, the AIP proposal. And at the time he was even talking of \$10,000 incentives. And you know, I think most of us agreed that was, although it was still going to create the desired effect to get more animals out of federal ownership and into private ownership, there was too much incentive there and it would hit, it would've brought out the worst in people in terms of the adoption program in particular, the thousand dollars. I see something that I wonder about, I'm going to start this by asking a question. Are you experiencing staffing issues with regard to AIP inspections or compliance investigations at all?

Mr. McGuire: Well, actually, our compliance numbers are, I was say, pretty good, if you look, I'd pull up Holle's presentation from earlier that showed what our compliance numbers are relative to what our adoption numbers have been. And they're practically one for one pretty close.

Mr. French: I only asked the question be only because I, one of the main criticisms I've received out of Nevada has been that the, they've been people who have adopted under AIP haven't been unable to affect some sort of an investigation or inspection necessary to complete the process. And they were wondering if, you know, if they fell into a black hole someplace.

Mr. McGuire: Okay. And it could be, just to address your question, I think maybe on a localized basis, there may be

individual offices that have, if they've got vacancies that are in the process of being filled, that could affect their capacity to conduct those compliance inspections on a timely basis. But overall, if you look at the numbers, I think we're meeting the objective.

Mr. French: I'm congratulate on that it's a, I mean, it's a big job. I think that is ultimately could be in those areas, which are experiencing those kind of staffing shortfalls and are unable to meet that demand. I think that might be a place where we might be able to stop gap some of the issues with regard to untitled horses showing up in sale barns.

Mr. McGuire: Well, if I could address that is something that obviously, BLM pays very close attention to. If we've got untitled animals that are being sold, that's something I would say, I'm going to go out on a limb and say, it's probably a nearly 100% of those that we capture, there aren't going to be very many untitled animals that are making their way through sale. You know, we have a responsibility that's federal property. We're going to follow up on that. And if we've got someone who's improperly sold an untitled animal, then we're going to address that appropriately. That could be criminal. But more often than not, it's administrative. That person could be rendered ineligible to participate in the adoption program in the future at a minimum, depending on all of the facts. But that's a little different situation than someone obtaining title to an animal and then subsequently selling that animal. That's a different situation. And I think with respect to the AIP, that's the situation where we've heard the most concern from members of the public and stakeholders.

Mr. French: I think most of the criticism we received on this, at least I'll just use myself on the board, had to do with those claims that untitled horses were making their way into the pipeline. I heard that often.

Mr. McGuire: Untitled.

Mr. French: Untitled. You know, obviously, I'm not going to be investigating those things, I just take the criticism, and I think it brings that, it precipitated my question to you about the staffing side of it, but also I think I'll just state for the record, I think there's a perception on the part of much of the public that titled horses that come out of the program, either AIP or conventional adoption have some sort of protection under the Wild Horse and Burro Act for their life. And that's not the case. That horse's titled, it belong becomes somebody's personal property, which can be sold at that point. And I think it's important that the public understand that I think there is that perception that any horse that came out of the Wild Horse and Burro Program has that protection for life.

Mr. McGuire: That's correct.

Mr. French: And I will just say that, I'll just leave it at that. And the last thing I wanted to ask about, as I'm curious as to why, what the logic was behind going from \$25 adoption application to 125? We had that debate here when that was first being discussed and we felt just, you know, the whole AIP program was to try to bring people into the program and by increasing application fees and whatnot, it seems like that is counter to that initial.

Mr. McGuire: Well, so traditionally \$125 has been the standard adoption fee for years and years and years, 25 is a reduced fee. So I think probably the thinking behind that is that to the extent that there is a profit potential for someone participating in the AIP, if the initial fee is increased, it reduces that profit potential and so reduces the lure of attempting to exploit the program.

Mr. French: I've stuck my toe in the water on that one when I was answering that question. And the person that was looking in the eye said, "Are you kidding me?" Profit potential for, you know, even at \$1,000 incentive, there is no way in the world that there's any profit involved in that in terms of once you, you feed that horse and you do the vet expenses and whatnot, \$1,000 isn't even coming close to that. And I don't think we expect that we're going to be subsidizing the care of horses for perpetuity and whatnot. I just, it seemed counterintuitive to me that, you know, as far as increasing that application fee. Thanks. I'm just going to leave it at that so-

Ms. Carlisle: I want to make a comment addressing that a little bit and because I saw some of this sort of, I mean, it was a little bit of a miscommunication between those that are concerned that I don't think there, I mean, it would be lovely if those horses were protected into perpetuity. I think a lot of people understand that, it can't happen. We don't have the



resources, but every effort to have the intent occurring that people are adopting for a good reason, that horses are going to a good home. And so I think the concerns are not, I think people, I think that actually a lot of people do understand that once title passes, the BLM just cannot do anything, even if they wanted to, they don't have jurisdiction over that horse anymore. And so the concern is actually, not whether it's a titled or untitled horse in that feed lot inappropriately, but that the purpose and the intent of the AIP was to incentivize using that cash to take good care of that animal. And if someone is adopting it with the sole intent of flipping it, that is not okay. And so the protections that can be put in advance of that are really desired. And so I, you know, just to that point of, obviously, there's concern when it's an untitled horse because that's an actionable, you know, the BLM can go after that's absolutely clear. But it gets unclear, if it's a titled animal. But what's not unclear is that if someone is working in cahoots with a larger group of people, and you know, the day after they're receiving that title, that animal ends up in a sales barn, that's not the intent of the AIP program. So let's stop it. And that's the concern I think that some stakeholders have when they're trying to get that message across. And the response is, well, it's titled, we can't do anything about it. That's where that frustration comes from I believe, some of that frustration.

Mr. French: Madam Chair, I think I just follow up to that. I don't disagree with you at all on that. The intent of the whole AIP program was just to do what, Dr. Jenkins actually talked about the first day here was to relieve some of the budget constraints that were on the federal government. So that there create more space for long-term holding, you know, as we are moving through this process. And I think I get it. I think we'd have a... I think the suggestions that came from this board regarding the front end modification to the AIP program to try to stop the gamers from being successful, I think is where the effort needs to go in. And I think, you know, it goes to what Dr. Perryman was just saying, you know, not knowing what is actually on the table right now within the organization. It's kind of hard for us to be able to throw any of those out on the table. But, you know, I'm willing to talk about two of them that Dr. Perryman came up with that I think probably makes sense, and I'm just going to throw them out on the table right now, having a first rider of refusal on the bureau. In other words, if you adopt a horse from the AIP program before you can sell that horse and you'll sign that agreement, is that you contact the Bureau of Land Management and give them the first right of refusal back into the program. I'm realized, you don't want more horses back into the program, but it, what it does, two things. First off, it allows for those people who have concerns of those horses going right back into the sale pipeline, it allows the most of the folks that had criticism for the program, it allows those folks to be able to be assured that horse is going to go back into the program first before it is goes into the sale pipeline. And then secondly, and then more important to me is that it puts the person who buys, who gets into the system and games, it tells them that they're back on the radar, if they have to contact the BLM for clearance to do that, to sell out horse out of the AIP program through the first rider refusal or whatever. It allows the bureau to target that guy. You know, I'm seeing, you know, if you're going to, if you really want to game the system and you've got seven horses or 10 horses in the program, and within two years, nine of those horses come back in front of you in terms of first rider of refusal, you have, you've got a name, you should be able to target that person is that, I'm wondering what's going on with this guy. It also tells him that he's going to have to be, he's going to be in the crosshairs on that line, along that line. The other thing is, rather than title that horse in in one year, require it for two years, don't title that horse for two years. Within, if you've got to hold that horse for two years after you adopt it, the incentive for gaming the system goes away because you just took care of that horse for two years and that \$1,000 doesn't mean a thing at that point. So anyway, I think those two items are made a whole lot of sense to me.

Dr. Perryman: Well, even the value that you might gain from the sale of the horse is eaten up by that second year, certainly.

Mr. French: Absolutely does.

Dr. Perryman: I think it would really reduce the likelihood that someone would choose to do that.

Ms. Carlisle: Can we let Holle' respond?

Ms. McAlpine: No, can I just say something quickly then Holle' can respond. And that's just to back this up, you know, under my strong feeling that we don't punish the good people. If something like that was instituted, they still have the horse, you know, it's theirs, they have the incentive, but they just don't have the title. So then they're not effectively punished. They have everything they have, but it does stop the bad guys without punishing the individuals who really care and helping out. Thank you, Paul.



Ms. Waddell: Yeah, no problem. I was just going to step in with a couple of thoughts, and one of them is statutory authority. We shared with you all the Wild Free-Roaming Horses and Burros Act, and there, it's very clear what the law states regarding 12 months in titling. Okay, so I want to encourage you to familiarize yourself with the act, so that when you're making recommendations, they're not things that require legislative changes, right. because that's not something that we can immediately do. And so that's one. Number two, when talking about the Adoption Incentive Program, I mentioned this a couple of days ago, but we're talking about the actual numbers of animals that were sold, if they were untitled, or even ones that we were contacted about that ended up being titled and whether or not that was a violation. And we talked about this during the workshops and really as Paul stated, encouraged people to really think about those side boards about what is statutory and what's regulatory, and even things that are regulatory that we can suggest in changes of regulations. Those things take time. And so it would be helpful, I think, for members of the public and the board to have, you know, that understanding about the intent of the incentive, the number of animals that were sold at Cell Barnes, the number of adopters that were taking home, families of adopters that were trying to, and I hate to use the term flipping, right, because I think we agree that the cost of caring for animal doesn't cover \$1,000 in any one year. So at the time that the person would be eligible for title and had that compliance inspection, then they would've spent well over \$1,000 caring for that animal, which is the responsibility of the adopter for their 12 months. And so if what we're trying to address is public perception, then I think we can do that through outreach and education. We had great conversations through those workshops about other options, the vouchers, and this is not a secret, Dr. Perryman and other members of the board. However, we were asked by leadership to let's have a briefing and a conversation about what this communications plan will be and when we released the report from those workshops and also the BLM considerations. So that was a question from leadership. We were happy to do that. Schedules just did not allow us to have that briefing prior to coming here today. So obviously, it's not Paul's fault, it's not David's fault, it's not my fault. It's no one's fault, right. We obviously have the end of the year, plus we've been planning this board meeting, so we've been busy. Not to mention closing out the year and doing everything else that we're doing. So I think what's helpful to hear from you guys is that continued support for an Adoption Incentive Program. I think that's great. And I think there's a lot of flexibility into what those incentives could be. And that's the conversation, right. Instead of the constant criticism of, and I know, you all don't mean it towards me, but there are a lot of people that are in the field that are watching, you know, this board meeting that did some amazing work this year. I think we had the final numbers from Meredith that were 7,800 on the number of animals that are placed into private care. And not all of those adopters of those animals adopted with ill intentions. I believe that to my core. We also had the removals of over 20,000 animals. Yesterday, we said 19,000, but Meredith finalized those numbers, and that was over 20,000. And that's some astonishing work from many of our specialists out in the field that Jerry told me worked 45 days without a day off, 10 and 12 hours a day. And so that's the commitment and dedication of some of the BLM staff and I'm sure Forest Service staff. So not to leave you out, Dr. Drotar. So one of the things that I think that's important when we're talking about the work that we're doing and the potential recommendations, and so those can be some of the considerations and not just, you know, what you're hearing from the constituents, because I think it's important, but I want to be clear that we're not talking, we're talking about a very small number of people that also have their own perceptions of the program and BLM that are biased and not looking at it from a holistic program. So that's it.

Ms. Carlisle: Holle', I would agree with a lot of that. And I think that the frustration around this, in general has come from just exactly some of the things that you're saying, that there's all these other conditional things happening around this concern that are very difficult to communicate. And this adoption is difficult to begin with, no matter what parameters you have around it. So I certainly don't want the conversation to be taken as completely critical conversation is occurring because there is so much concern around it now, whether it's, you know, whether that concern is, you know, hard and fast data that we can really lock onto and understand or not is still seems debatable. So I don't think it's a bad thing to discuss it and get a little frustrated about it because it is frustrating. And obviously, I think everyone understands that the BLM is under incredible constraints and including that we are all people, we have a workday and then hopefully, we get to go home and do something else. But anyway, I just wanted to throw that out there. And just a clarifying question of, if title is statutorily defined as in 12 months, but the AIP program did not require statutory change. Is there potential that there's a workaround in effect?

Ms. Waddell: So I think that's one of the misconceptions is that the Adoption Incentive Program stands alone. It does not. As Paul mentioned earlier, the Adoption Incentive Program is a result of the overall adoption program. You have to meet the requirements that are outlined in our regulations with the intent that is in the law itself regarding the making a animals available for adoption. And so where we've stepped it down is to offer the incentive to try and encourage more people to adopt, right. Our numbers were down very low. And so we had the flexibility to do that. So we have the option, obviously

through policy to make changes to some of our programs, and that's one of them. The requirement of 12 months is in the law. So that's that difference. So whether you adopt the animal through in Adoption Incentive Program that has a cash incentive, an Adoption Incentive Program, that's a buddy pass, Adoption Incentive Program where we have reduced fee burros. We used to do that all the time, believe it or not, burros didn't always get adopted. So we've had several different programs, but that requirement of 12 months is what is in the law, right.

Ms. Carlisle: Yeah. Commissioner French and then Dr. Lenz.

Mr. French: Okay, Holle', I get it. I am familiar with the act. I do get the... I did have the 12 months on the back of my mind, but I also on the back of my mind had, the number of times that other entities who have criticized this whole program have been in front of Congress to modify the Wild Horse and Burro Act. And as you're well aware of, there's a lot of modifications that have come down on this since 1971 that have modified the original act. And there was one proposed this last year to modify the act. I would just say that I'm just, I'm saying this from a standpoint of trying to get out in front of this thing before it ends up, before we lose the AIP program in Congress. And I'm just saying is that if we could propose some of those simple changes that we just mentioned here a minute ago, I think it goes a long ways for us to meet those challengers or those criticisms on the front side of it. And that's all I offered them as I do get the fact that there, we have statutory and regulatory authority and whatnot, and I'm just trying to think out-of-the-box using that term, again, overused term, but I'm just trying to get to the point to where we get out in front of this thing. And I know from our standpoint in Nevada, I really, I didn't mean anything as a criticism to the bureau when I, in terms of the folks asking me, whether or not they could get those inspections and whatnot, they just contacted me and wanted to know how to go about doing it. And I just wanted to pass that along. The other thing is it has to do with that whole notion that there's animals making it in the sale pipeline that are untitled. And I like I say, I don't, I'd be surprised if many of them made it through the, that sale pipeline untitled, but I just I thought it was important that we understand that's what the rumble is on the ground right now, that these horses are being sold. It's a slaughter. I mean, I heard it in our public common how many times we heard that the whole AIP is a pipeline to slaughter and it's not true. And I just wanted to get out in front of that, so thanks.

Mr. French: Well, I think it's important we don't overreact and then we do this based on factual information. And I think a lot, and I have no idea how many, I may have sale barns, but the fact that a horse goes to a sale barn doesn't mean they go to a processing plant, right. And I've yet to have someone prove to me that the, any of these horses ended up across the border, a processing plant, right. So I think we need to try to confirm the information that were provided and not just move forward based on what we hear in social media and what we heard yesterday in the public comment. There's a gross exaggeration on a number of issues that have been brought up. I guess I don't have any trouble with extending the time to sign these horses over, but there's a fair number of trainers that adopt these horses and train them and then sell them to somebody. And a lot of them, I know a lot of them personally, and I think that would be problematic for those folks because within six months or so, they'll have a horse trained well and then they can sell the horse and come back and adopt a bunch of other horses and move on. So I think it, we have to be careful that we don't limit the people that are doing this honestly and following the system based on a few folks that we hear something else that's going on. And so I think I agree with Holle' that education up front and perhaps a little more vetting the people that are doing, that are adopting these horses. I mean it... If I saw a group of folks with similar last names as they were coming back repeatedly to adopt four horses, it might raise a little red flag that I might want to check that out, right. But I just think we need to, I mean, the Mustang makeover, those horses end up being sold and they've been in the hands of those people for those people or adopters, are they, or those still BLM horses for only 100 days.

Ms. Waddell: Yeah, so it's a combination at times, we have provided cell eligible animals for those competitions and other times we've provided animals that would be eligible for adoption. And even when the animals are eligible for adoption, they're adopted, they are taken home normally. They have training and they're titled. So I obviously, I agree that to my knowledge, we have no knowledge. I don't have any knowledge of any animals that have gone across a border or to a processing plant, titled or untitled. And I don't have any knowledge of any untitled animals being sold at a sale barn or sold illegally. Any of that knowledge, we have any contacts that we've ever received, we've immediately taken action. And I talked about that on Tuesday. But, you know, I guess my concern is the perception and what is constantly spewed about the Adoption Incentive Program and the accusations of, you know, BLM not caring about what happens to these animals because that's just not true. You know, a great deal of work goes into the beginning stages of these animals with monitoring and gather. I won't take you through all of our operations because you all know, but from start to the time that

they're available for adoption or sale or transfer, I mean, there's a great deal of work those that goes into that.

Dr. Lenz: Have we ever done any post adoption surveys to see what percent of the animals end up as a pet versus a trained horse versus a horse that's trained and then sold? Do we have any idea?

Ms. Waddell: So not an official survey, but we do receive, I can't begin to tell you how many adopter stories. At one point, Jason has been putting together a block over the last couple of years and we had quite a bit of stories that we just post all the one time. So we kind of did them weekly and I really wanted to call it Wild Horse Wednesday. He never picked up on that. But you know, maybe one day we will, but we would have stories from people and even one of the photos in my PowerPoint, I forgot to highlighted, but it was a family of people who had all adopted and some of them were families and then some of them were not, but it was part of a 4-H effort, I think it was in Idaho and it was, I don't know, 15 people in this photo. And so there are families that adopting, some of them are adopting with the intent to teach kids how to train. It's a family affair. So everybody was the last name that's adopting four animals and participating in Adoption Incentive Program, isn't coming in with ill intentions. I mean, again, we're talking about a select few people. You know, we're not talking about large numbers of animals. And I think the way it's described, either through public comments or even in discussion this week, it's been described as if thousands of the 7,800 animals that we place into private care have been sold illegally. And that's not true.

Dr. Lenz: Well, I think, it'd be good if the folks watching this, if they have proof that these horses end up in a bad place that they provided, right. Because they would be great to be able to follow-up on something and actually see that it's going on, right?

Ms. Carlisle: I would like Dr. Jenkins wants to respond and then we'll keep wrapping around.

Dr. Jenkins: And not a response, but a comment in some way. You know, the messages that come from a set of folks about the program are quite powerful. And I think, they're powerful for two reasons. They continue to say that wild horses are entering the slaughter pipeline. There are two problems there. They're not wild horses, they're private property. Second one is the one that Dr. Lenz just brought up. We don't know where they go, once they're sold, but it's a very powerful message. Those two ideas, wild horses are entering the slaughter pipeline. It's so powerful that we get letters from our, you know, senators and representatives that come to the BLM that then we have to respond to. But the power of that language is extraordinary. Our effort is to educate folks, so that language is devoid of that power because it's inaccurate. They aren't wild horses that are being sold their private property and we don't know where they go afterwards. So this idea of a slaughter pipeline, however, powerful it is, gets to Dr. Lenz's point. We don't know. So we've asked the advocates who express this point of view to come to us with credible information, so we can understand and help stop whatever it is that is illegal going on. So far we've not received what we see is that level of credible information. Now, we are open to that and as I've said, and as Holle' has said, and as the board has said, and as our staff has said, we don't want abuses of this program. We care for these animals. We want to see them thrive. And we want our partners to help us in that. But this is part of the rhetoric that I hear that makes it really difficult to get past that message with the facts of the, as we see them and as we are trying to help out. Anyway, I wanted to bring those ideas up to you all for some consideration.

Ms. Carlisle: Can I ask when organizations or individuals I would assume, and I am making assumptions, are claiming that they have information and you're saying you have asked for that information. Have you asked just broadly or have you had specific organizational requests and then not received that information? How is that occurring? Or is there nothing to tell because you've received nothing?

Ms. Waddell: So we've received some reports and emails, pictures, freeze marks with concerns. And we have taken action. We have reviewed our Wild Horse and Burro Program system that I talked about earlier this week, which is a database to check those freeze marks against those animals to see whether or not, they are titled, still adopted, the dates. And we have found that the majority of those animals have been titled. There were a few animals that were untitled that after further research, we found that those animals had been repossessed, the adopters had been contacted and had been referred to law enforcement.

Dr. Perryman: I am so glad that we have had this conversation and that you have said what you have said. I commend you on that. I know in our last in-person meeting, I brought this up after one of the public comment periods that these are

serious allegations that individuals and groups are making. I mean, these are serious claims, serious from the fact that if they're true, they need to stop. Maybe not so serious in whether or not, it's actually occurring. And so I'm so glad that this is out in the open now. And I'll try and say it sort of the way I think, I said it the last time. If there are serious and reasonable, if groups or individuals have evidence that this is occurring, these kinds of things are occurring, they need to get ahold of you guys, so that it can be investigated. And according to what you're telling us today, that you have investigated what you have been given and none of this is going on. So these folks that stand up and want to grandstand and say that they have evidence that 1,000 horses have been run through the slaughter channel over the last couple of years is false, is that's what I'm hearing from you. You guys have no evidence from your investigations that this has ever happened or has happened in the last couple of years. Anyway, this reasonable amount of time that we've been talking about, so-

Ms. Waddell: Correct. Yes, that is correct.

Dr. Perryman: Good. The board needs to hear that and I think the public needs to hear that as well. So thank you very much for your candor.

Ms. McAlpine: And following that from Barry. And I think, we've said it a lot over the last couple of days, that our intention in any question that we ask or statement that we make, is that it be heard by the public who may or most likely aren't really listening and that BLM staff and management get to publicly answer, some of those questions because you've been quite candid and we appreciate that. And we have also heard and understand from the field staff up that much of this issue goes back to Congress, that Congress needs to make the appropriate changes in conjunction with BLM to help us resolve the current situation that we're in, and that that legislation needs to be made quickly. You know, it time to play around and gerrymander and needs to end. And the other thing that John Hall mentioned, and I don't remember if I asked him when he was here, but when I asked him in the program that he manages what the return rate, or I'm going to use the word confiscation rate, is on the horses and burros that he puts through his program, it's way less than 1%. My little brain can't even put the decimal points where they belong. So it is an issue and it is a serious issue, you know, but part of this is congressional and legislative and the final statement I need to make is that when this board sits down to do recommendations, we pull out our chatter, we pull out the act, you know, and we struggle with what can be done, what can't be done, and what we need to emphasize. So maybe it can get done. So that's where some of that comes from and it field staff or management, I know you understand, you feel kind of like they're picked on. Again, it's not that we're picking on anybody or trying to highlight a deficiency, we're trying to get it out in the open for discussion, so people can hear it and maybe we come to those out-of-the-box solutions and it could very well be because we get beat up that the solution gets taken care of. So thank you to all you guys and I know field staff have lots of answers, Hald Drew. Take care of this situation and I hope they'll listened to.

Ms. Waddell: Thank you, Susan. Celeste, I'd like to suggest, we do have Meredith in the room and I'd like to talk with her about providing a report that I think might be helpful regarding the number of animals adopted, those being in the Adoption Incentive Program, a return reposition. We can talk about it and provide the two all after lunch.

Ms. Carlisle: Okay, that would be great. And Bryant and I have been trying to communicate to just get us on track, so I'm going to have him go ahead.

Mr. Kuechle: Yeah, I just want to do a quick check-in. So we are about 15 minutes over, but I think that's okay. We have an hour at this point that we can utilize before lunch for the Advisory Boards to tighten up the recommendations and then, excuse me, the subcommittees to tighten up the recommendations. We'll want to make sure we take that lunch break promptly at noon, that so that we have ample time to take our break because we need to begin our public comment period promptly at 1:30. So utilize this next hour to get organized, I suppose, for the afternoon so we can prepare to submit recommendations.

Ms. Carlisle: I know this is not scheduled, but if we could have about a 10 minute break, just so that I can prepare the document that we need to project.

**[BREAK]**



## Discussion on Board Recommendations

Mr. Kuechle: Okay, we're back. So welcome back again, Wild Horse and Burro Advisory Board meeting day two. We have time set aside now for the board to have their discussion around recommendations. We do have Steven Yardley, our board member joining us via phone, listening in and this, we'll take this till about noon and then we'll want to make sure we take our lunch-break to return at 1:30 for the public comment period of time. So hand over to Board Chair, Celeste Carlisle.

Ms. Carlisle: Thank you very much for allowing us a short break. These are the beginnings of recommendations that the subcommittees have put together based on our conversations here and also just the historical work leading up. So again, a starting point, but the likely directions that we'll move in. So I think at this point, because we don't need to go through and vote on these quite yet, we need to hear another round of public comments. If we just go through and see if there's any discussion around these that needs to occur, we can have that. And if we have clarifying questions from the agencies, we have the opportunity. So I'm not sure how... This is not an official recommendation because we've gotten some notice from the FACA advisor, but just a statement to suggest that the, we strongly recommend that appointments to the Advisory Board be made within 30 days of expiration of a board member's term. If this is not possible, we recommend that the board member who is rotating off continues serving until a new member is appointed as long as the Advisory Board approves the extension. And I know we talked about this on the first day, so perhaps there's not much more, but if anyone has anything to address around this, I think we all agree, it's important idea. Holle'.

Ms. Waddell: I guess, you know, one of the things is we did ask that question and what I'm hoping is that we'll be able to get a little more clarity on, if it's not something that's currently done, how do we get it considered? Because I think that's the most important piece that maybe no other board has ever asked that question. And so I would definitely like to, I have no idea what the starting point would be, but we'll definitely take it back and get that started because I just don't think anyone's ever asked.

Ms. Carlisle: That is really great.

Dr. Drotar: I wanted to second what Holle' was saying because I was on the committee to help look at the board members and we did our job in a very timely manner, but the approval of the individuals we've put forward was what was the delay for an extreme amount of time. So I wanted to second what Holle' said.

Ms. Carlisle: All right, so just as a preamble to the recommendations, the Advisory Board believes that in the 2020 Report to Congress, the BLM and Forest Service requested that Congress make immediate legislative changes to allow policy changes for the humane management of our arranged lands and wildlife into perpetuity in respect to the animals in the ecosystem. The board advises that BLM include the following recommendations in their annual Report to Congress. So this is a little bit additional to what we usually do, which is just offer up the recommendations, but also, and we don't advise or make recommendations to Congress, but so that everyone is receiving the same information. Here you go. All right, so we'll scroll down. We've sort of put these into areas of our subcommittees because those subcommittees are the ones that dig in and try to make sure that the recommendation is appropriate to our charter, but sometimes we need a little direction on that from the agencies. So within the BLM Forest Service structure and collaborative group, these were the suggested directions for recommendations. Number one, in order to improve the Wild Horse and Burro Program's efficiencies and coordination, the Advisory Board recommends that BLM leadership make it a priority to address the national, district and state disconnect that now exists to the detriment of the animal, stakeholders and the ecosystem. Oh, sorry, the ecosystem BLM staff and possible interagency collaboration opportunities. Better coordination plans should be explored. For example, following the Forest Service fire management model for emergency gathers. In addition, there is a strong need to address long-term budgeting of Wild Horse and Burro Programs in order to provide continuity for long-term planning. For example, creation of a centrally administered, separate budget for emergency gathers, which now occur annually, could help states implement strategic gathers that involve removals coupled with application of contraception prior to release. Funding for the US Forest Service to similarly manage their wild horse and burro population should also be established. Any discussion around that, at this time? Board tired and hungry. All right, number two.



Dr. Perryman: Madam chair, I would just say, this is not a jab at the staff. This is a systemic thing that the board believes is an impediment to the staff. Not that the staff are creating this. So I just want to be on record with that.

Dr. Drotar: And I want to say that we very much appreciate that because it is front and center with the Forest Service.

Ms. McAlpine: Madam Chair, the only suggestion that I would have on that is to take the last line. Funding for the US Forest Service to manage and just make that its own maybe to be. So it's a little bit separate from BLM.

Ms. Carlisle: Okay. Duly noted.

Dr. Bechert: Yeah, I remember Dr. Perryman talking about tax credits and I don't know if we want to include that as a second example here because we give one example with the separate budget for emergency gathers, but that would be another example, just to explore.

Ms. Carlisle: Okay. Thanks all. I'm just going to capture these on these notes at the time, so we don't all have to do it right here. Yes. Everyone, we got a lot of reports of how painful that was to watch. So number two, the BLM and Forest Service should centralize the Wild Horse and Burro Programs and institute organizational changes that would increase their program effectiveness.

Dr. Lenz: Any examples of what that might look like?

Ms. Carlisle: Well, it's related to one and no, we didn't-

Ms. McAlpine: But I also, I think, it really is a management decision to make those organizational changes, based on the conversations, we've had for the last two days.

Dr. Lenz: Well, if I read that, I would say, okay, what might that be? I mean, it's almost like we need to specifically point out something or give an example or something because that's really vague to me. Maybe it's just me.

Dr. Bechert: No, there was number one, is the combination of what used to be one and two. And I think what two does is repeat the first part of number one.

Dr. Lenz: Yeah, I think there's redundancy here. I think number one takes care of number two.

Ms. Carlisle: I think that you may be right.

Dr. Lenz: Why wouldn't want to go back to breaking one up into two, like it was initial.

Ms. McAlpine: And I disagree with that. I think it needs to stand alone in respectful management and let them make the decisions.

Ms. Carlisle: All right, can we hold that in our brains for a little bit? Just as I'm watching time and I've started so we can come back to it at the end. Again, these are directions we're thinking of heading in. The Humane Handling and Communication subcommittee discussed the following. The board recommends that the BLM and Forest Service develop a clear, definitive reporting process for the public to report Comprehensive Animal Welfare Protocol or other complaints or observations. In addition to the existing phone number and email address, the process should include a well-publicized, easy-to-find online form with detailed questions to help clarify the nature of the complaint or observation. For example, category of complaint and perceived Comprehensive Animal Welfare Program violation, time and location, observations made, and ability to upload photographic or video evidence, a list of witnesses, personal contact information for follow-up as needed. Let me just clarify. We know that some of this might not be appropriate with OMB paperwork reduction and

privacy issues. They were just examples. Responses or timely updates should be provided in a transparent fashion to the original reporter and to the public in general. Data gathered through this system should be stored in a database without personal contact details to more efficiently track the nature of complaints, observe trends, and better address challenges that emerge. Comments generalized in nature that anyone would like to suggest or think about at the moment. Dr. Bleich, did you have something?

Dr. Bleich: Not yet.

Ms. Carlisle: Okay. Okay.

Dr. Bleich: I can see this generating lots and lots of opportunities for meaningless input. That's the comment that I would make. If someone has a problem, they will persist in getting it reported. Making things too easy, invites abuse of the system.

Ms. Carlisle: I noted. Okay, I think those are things we need to track back too. Number four, well, I don't know what number it is because my copy is different. Number two, board recommends that the BLM continue to investigate vouchers as incentives for the AIP program and quickly respond to the stakeholder group ideas and concerns expressed during May and June, 2022 facilitated meetings. Generalized comments. Okay, we get through these, we can wrap back to the few that we're a little stuck on. Okay. Number three. Many experienced and responsible community resources have indicated a strong interest to work with BLM and Forest Service in the best interest of wild horses and burros. The board recommends that the BLM and Forest Service investigate an agency avenue to build local partnerships/coalitions to support wild horse and burro care, ensure compliance and provide post-adoption support. These efforts should include. A, establishing a community of successful adopters to share knowledge and resources. This could be online. B, partnering with organizations that already train horses such as university equine programs, Mustang Heritage Foundation. C, reviewing the inspection process and requirements. D, identify someone who could provide programmatic support for these activities. For example, building local partnerships, these are the activities, training programs, ensure compliance, monitor online discussions, organize regional networking events for adopters or coordinate voucher program and inspections. Comments about this one. Generalized comments, concerns red flags. Okay.

Dr. Perryman: Some of this may be redundant as well. Given what we've heard this morning.

Ms. Carlisle: Yes, I agreed. Okay. Noted. We'll come back to it. And the ecology subcommittee, which is shortened. Our numbering is a little crazy. Okay, the board recommends that the BLM and Forest Service identify HMAs and Territories that will provide the appropriate number of sites to test and validate the PopEquus model developed by USGS scientists. Description or discussion around that. Last, but not least, measurable objectives outlining targeted reproductive growth rate reduction and multi-year plans for individual Herd Management Areas must be developed as robust and meaningful portions of all gather plans. Proven safe and humane fertility control treatments must be combined with every gather operation, including on HMAs where Appropriate Management Level is not immediately achieved. This is an effort to increase fertility control immediately, as desired by multiple, diverse stakeholders, and to reduce overall numbers of horses and burros and disrupt the cycle of repeat removals and long-term holding. Discussion around that, Ms. McAlpine? Oh yeah.

Ms. McAlpine: I just have a quick comment. I like the addition of the last line, disrupt the cycle of repeat removals and long-term holding. We had quite a discussion over the last three days, so whoever added it, thank you.

Ms. Carlisle: People have the energy to scroll back up through a few of the things, the bigger things, not the wordsmithing things, but the bigger generalized things we need to discuss. You ready for that one.

Dr. Lenz: Why these are board recommendations. So why would we say control immediately as desired by multiple diverse stakeholders and then to reduce, I mean, these are desired by us, right. The board. So does that give it more power or what, why do we insert that? I may be wordsmithing here, but-

Ms. Carlisle: You may be wordsmithing, but it's okay at that level. I mean, it's not necessary. I think we can. Okay.

Mr. Kuechle: Dr. Lenz, we need to, move you the mic a little bit closer when you speak, so we can make sure we get the recording.

Dr. Lenz: Or it says this is an effort... Fertility control immediately as desired by stakeholders under use overall numbers of horses. So I guess I look at those, these are our recommendations as a board. And so it's the desire of the board.

Ms. Carlisle: Yeah, it was just to acknowledge that there is a broader, generalized group of stakeholders that is supportive of this than there has been in the past. There's been the same stakeholders interested in it, but it is broadening. But I don't think it's necessary. It's nice, but.

Dr. Bechert: I added the disrupt the cycle of repeat removals. I'd like that to stay. And I think the, I didn't draft the initial part, but I did notice in public comments this time that there was more support for fertility control that I hadn't seen before. So that's the only reason maybe to consider keeping it, but otherwise, yeah, it's kind of an obvious goal.

Dr. Perryman: The practical aspect of it is, as an example, as a hypothetical example, if you do a gather and you're going to gather, you want to remove a thousand animals, pick up, you know, an even number and you capture 1200, you don't turn those 200 back out on the range without a decision being made on whether or not that individual mare needs what kind of fertility control applied to yes, no. And if yes, then what brand, what style, what flavor and so on. You don't turn an animal back out, unless it has been considered for fertility control.

Ms. Carlisle: Okay. This is bouncing around a little, but if we could scroll back up to the top, and I'm just going to in the, because we have some time before lunch and lunch will be lunch. The big suggestions that were made, let's hit them again and see, if we can come to any agreements. Again, we don't need to wordsmith. I'll track that on one sheet of paper and hand it off to our facilitators, so they can do that and project it after the public comments, but-

Ms. McAlpine: The first line, my copy says with respect to the taxpayers, and that's been deleted and I think that follows with Barry and what Tom had to say about keeping it within the board.

Ms. Carlisle: Scroll all the way up to the top in that 'please consider, not an official recommendation' sentence. Sorry. In the next, in the under recommendations sentence, don't scroll it anymore. So I can read it. Stop. Well, my eyes are bugging out. Under recommendations, the first sentence reads, the Advisory Board believes that Congress make immediate legislative changes to allow policy changes for the humane management of our range lands. And here's where we made a change that not everybody has seen it used to say, and the taxpayers. Now it says, and wildlife into perpetuity in respect. So-

Ms. McAlpine: Yep. Nope. And bringing it up. I'm just saying after listening to, I think it was Barry who said something about it needs to stay with the board, let it stay with the board. I think when I drafted it, I just used the wording. I just wanted to highlight that I heard what they said. And I'm good with the change.

Ms. Carlisle: Okay. Thank you. All right, so then the next, if you could scroll down to number one and gimme a second to rest my eyes and look at my notes. We need to look at the redundancy between one and two and determine, if we are making two separate recommendations here or if it is just one.

Dr. Lenz: Well, so on number one, we're talking about the disconnect between the various groups within the BLM and we're talking about the budget. So it seems to me like we would separate those a bit, but maybe, I mean, maybe not.

Ms. Carlisle: Combine, and again, Tori, you don't need to do this yet. I'll make notes and pass them off to you. If we combined the first part of one and two and made the budget part a separate recommendation. Okay.

Dr. Lenz: I think number two could be your lead off sentence of number one.

Ms. Carlisle: Yeah. Okay. Everyone agree roughly with that. Again, we'll have Tori make these changes based on these notes and we'll get to look at it again.

Dr. Bleich: As I'll use the term copy editor or the individual who is making these changes, seeing the editorial comments that board members submitted to you earlier, Celeste. And have they been incorporated into this draft to the extent you thought it was appropriate?

Ms. Carlisle: Yes. This is the... Yes.

Dr. Perryman: This could, in keeping with the idea that we don't need 20 recommendations, if we could do this like a 5A and a 5B or something, I think. It's not going to reduce it, but it'll make me feel better.

Ms. McAlpine: And I would have no objection to moving funding for the United States Forest Service to the top. Although you know, again, we're Forest Service and not simply BLM, the sentence. So maybe we go with Barry's 2A, 2B concept. So it stands by itself.

Ms. Carlisle: All right. I'm going to go ahead and scroll us down. I just want to get these big meaty things out of the way. There's redundancy in number one. If anyone sees things that are easily eliminated. Number one of Humane Handling and Communication. We talked about, there's some redundancy in here, perhaps based on what we heard from Jerry yesterday is already being worked on.

Dr. Perryman: Madam Chairman. I just, I sort of have the same, and I haven't looked at this one that close, like this one's kind of morphed into something that I didn't originally see. And I agree with Dr. Bleich here that... What we're the intent of this, is the intent of this to make available a way for essentially a citizen to make a police, what would be like a police report. You know what I mean? That has all that information associated with it on the day of this accident happened with all other.

Ms. Carlisle: The point of that was that when oftentimes what the agencies or the advocacy organizations receive is an email with lots of frustration and nothing that can be followed. And so this is an effort to try to make sure that people know what information they would need to provide that's useful? Outrage that you've seen 10 horses going to slaughter, there's nothing to follow. So this is an effort and maybe we don't, and we shouldn't micromanage and layout exactly what's needed. Maybe the suggestion is aimed more at that idea.

Ms. McAlpine: As the chair of the committee who drafted this and having deep conversations over the last two days. I believe that BLM management has heard the issue and that we can delete almost all of it, up to the point where it says responses or timely updates should be provided in a transparent fashion to the original reporter and to the public in general. And then if they, I don't think we discussed the data gathering, but data gathered through the system should be stored in a database without personal contact information to more efficiently track. I would just go right there and I think Barry is right on the money. It's just micromanaging.

Dr. Perryman: And maybe that just, maybe this, maybe the bureau just has a button on a page that says that you click and it tells you what information you guys need or want. Okay, if you're going to email us, are you going to send us a letter or are you going to call these, this is the information that we absolutely have in order to do this investigation. So maybe that's a way to do it without having to create a database that's going to be kept somewhere that could be foiaed and, you know, I could see how that could get-

Dr. Lenz: Is there currently a form to fill out, if I were to go online complaint?

Ms. Waddell: No. There's just an email address and a number to call regarding the complaint, obviously, because we get complaints in all sorts of ways, right. My neighbor's not feeding their animal. I don't like the person next door. They shouldn't be able to adopt. We got to get, you know, complaints all around the center. So I think that's helpful. I did think that there were two things that were being asked yesterday. I thought one of them was, "Hey, when is the public audit assessment piece of CAWP coming out?" Right, I thought that was one question. And then separately was, "Hey, how is it?" I think Dr. Lenz, you were saying it'd be nice to know how many calls are you getting? You know, is there a way to know exactly how much information is really being received from the public, you know, without storing the information, but that we're counting it. And I don't really know the answer to the question, but those are the two things that I got from yesterday. And I think only one of them is really in this one, right. Is that piece about when people get online and want to submit a complaint, then how do they do that effectively? So yeah, we can probab... I have no idea. The button on our website, you won't believe how much drama it is about our website. But I think that we can probably find a way to communicate to the public that if you're going to be, if you're going to be reporting any information, here's the information we need. And if you'd like a call back about the results, then you know, let us know that and we can do that. Yeah, I think that's easy enough.

Ms. McAlpine: Okay. So I'm good. I mean, it's been heard. It's been heard by management, so I'm good.

Dr. Bechert: I was the one who added all the detail and I agree it's kind of micromanaging. Part of it was response to a request for detailed recommendations and part of it was to address the gap in information. And in an online form, the suggestion was that it could easily feed into a database as opposed to somebody having to transcribe information taken via email or phone. That if it's in an online form, it can automatically, you know, go into something that would highlight, well, how many complaints are in this area? So this is kind of an area, maybe we should pay more attention to. That's the idea behind it.

Dr. Drotar: I actually support all this information in there because in my organization then I can put that up to higher levels and maybe it is micromanagement, but maybe we need that at this point.

Ms. McAlpine: And Madam Chair, I'm good either way.

Dr. Lenz: Or just recommend that they develop an online detailed form to gather information.

Ms. Carlisle: Okay. The last one that we had redundancy in that we should look at before we break for lunch is scroll down to the last suggest in humane handling and communication. Thank you. Dr. Lenz's, let's start with you because you said there's definitely some redundancy here. So in general.

Dr. Lenz: I don't think it was me. It was someone, but it wasn't me.

Dr. Bechert: I can make a suggestion. So D), identify someone who can provide programmatic support for these activities. I think then you can delete all the examples because that really repeats what the activities would be.

Ms. Carlisle: Okay. Very good. That's helpful. Okay. We've eliminated some wordiness. I will, yes.

Ms. Waddell: I was just going to remind the board that we currently have the notice of funding opportunity that's outright, that'll also be kind of in a way building those partnerships. And I actually love this one because I think there's a lot of room for, I think there's a lot of room for building of partnerships and work that we can be doing together and that people can come in and do on their own some groups with some guidance about what may be needed. So I would just kind of maybe encourage some of that.

Dr. Lenz: So this isn't on the list, but after the discussion this morning, and I don't want to create paperwork that just is somewhere that nobody cares about. But I wonder, if it wouldn't be interesting to set up some type of post-adoption survey, like a customer service survey once in a while, sent out to just see what are you doing with that horse? Is a horse a



pet? Have you trained the horse and you're using it? If so, what are you using it for? Or did you train the horse and sell it? Or just to kind of get a feel where these animals go. Would that be of any interest to the BLM or is that just another deal.

Ms. Carlisle: Or is it already in the works or is talking about.

Ms. Waddell: So I'm going to lean to outreach and education again, right. And some of those communications, I don't know, you know, when you say the word survey, I think all of those things that, you know, that are required and how it took us, you know, when we were doing the Great Lakes marketing relationship and doing this survey to say, you know, "Why are people coming, how far would you drive? You know, how did you hear about it?" And it was like four questions or something. It was not that big. It took, I don't know, two years, Jason was, it was like two years to get that survey done. And at that point we didn't even want to know anymore. I mean we did, I'm kidding. But it did take, you know, quite some time to get that done. So I'm not opposed to surveys. I think they're amazing. You know, I had pulled up a website once upon a time when Paul and I can't remember what we were doing, but I sent this survey to him and it was like, "I don't know, Department of Labor, but it was so amazing about the information that they were collecting." And I was like, this is so easy, you know, how do we do this? We should totally, you know, figure out how we can do this. And I'm sure we got busy with 15 other things and never circle back. So I'm not opposed to it. I think it's probably good information to have. It definitely would help us in our marketing efforts, you know, and maybe engaging with those adopters, past adopters, encouraging them to come back and even purchasers. I mean, I don't say why purchasers couldn't respond and say, "Here's what I did with those animals that I purchased from you guys and they're doing wonderful out in the pasture."

Dr. Lenz: Yeah, I mean it might target and it could be a simple thing, like one question at the end of a year before you sign the horse over is say, so what are you doing with the horse? But if you look at some of the domestic breeds, they do that type of thing and they know to the horse, darn there, how many are racing show pet and then they know who to target or the, you know, where to put their efforts based on what kind of folks are participating the most and who's not participating. I don't know. It's just a thought.

Dr. Perryman: The Department of Labor may have more labor available.

Ms. Carlisle: Well, and I think in some rounds of meetings, not related to the board, maybe in those stakeholder meetings we had, there had been some discussion of this and there had been some discussion of trying to get some universities interested in this sort of work. This is an amazing grad student project. So any of you grad students in human dimensions programs around the US looking for a project with your advisor.

Ms. McAlpine: Madam Chair, somewhere in the original what, discussion one, two, three, four, five, 947 in the subcommittees there was a recommendation or part of a recommendation that said that the forms, the Adoption Incentive Program forms and the adoption programs should be changed. And I'm going to have to dig to find it and I can find out what that original was, but it may be in a conversation or a thought process that comments that came back that I wasn't aware of, that it was deleted for a reason. And I think it was Dr. Lenz who suggested them. Wade Beck.

Mr. Kuechle: Just a quick check-in where we've got about two minutes till the top of the hour, propose a hard stop and we can always pick this back up after the comment period.

Ms. Carlisle: Then I'm going to go ahead and cut us off after Dr. Bechert.

Dr. Bechert: Thank you. I'll be brief. Yeah, I remember that and I don't know why it got cut out and I think it was just to add a couple of questions to the adoption form and one was maybe what's your intent and maybe a reference would be included. Something like that.

Ms. Carlisle: I'll find it. Dr. Jenkins will close us out to lunch.

Dr. Jenkins: Yeah, thanks. It's always great to get the last word in, isn't it? A couple of suggestions. It's not my job to help you craft your board recommendations, and let me give you some observations and some recommendations. What I hear so far is that you're suggesting to the BLM shifts in orientation, shifts in practice and shifts in organization. And I think you need to attend to the verbs you're using of action. For example, when you ask us to address the disconnect, that's a really strange phrase for me and I'll tell you that a lot of state directors are going to say, "What are you talking about it? There's no disconnect. We're seamless here." But I think what you're saying is improve the coordination and then you can suggest how you think that coordination should be improved. So anyway, I'm just suggesting that you all attend to those verbs then will move to the BLM for some sort of shift. That's my last word.

Ms. McAlpine: See and you thought you had the last word. At lunchtime we can talk about it. I found-

Ms. Carlisle: No, we cannot talk about it at lunchtime.

Ms. McAlpine: That's right. I'm sorry.

Ms. Carlisle: But you can take notes on your note papers and we will discuss it when we come back. We will take our lunch break. Bryant, do you have any housekeeping to say?

Mr. Kuechle: No, so we have an hour and a half lunch break. We'll return at 1:30. We're going to promptly begin our public comment period time. So it's a, actually a two hour scheduled public comment period. We do have a full slate of virtual in-person commenters that have registered, but we do have availability for in-person. So if you are in Phoenix, you do anticipate coming to the meeting. We do have opportunity for in-person public comment, but all virtual slots are full. So we'll begin at 1:30 with public comment. So we ask you all be back for time. Okay. Welcome back, everybody. This is day two of the Bureau Land Management Wild Horse and burro, excuse me, Wild Horse and Burro Advisory Board meeting.

[BREAK]

### **Public Comment Period (3)**

**Laura Leigh**

My name is Laura Leigh. I represent Wild Horse Education. Just like several members of the public that have spoken before me, I have been making comment to this board for over a decade. It is tempting to simply repeat my comments given more than 10 years ago, the lack of enforcement and consequence of any violations of any purported animal welfare standard. The lack of transparency in the agency from records to basic access to animals and holding facilities. The deficiencies of the AIM protocol that leads to unscientific and unjustified decisions. How I never hear anyone ever speak about identifying and protecting critical habitat for wild horse and burro use, protecting that habitat from private profiteers and on and on. BLM has continued to put the cart, laden with gifts for their preferred partners before the horse. Today, I will focus on one thing, the site-specific management plan. Throughout this meeting, I have heard the board complaint about the lack of site-specific planning, but no one has called us plans by name. The Herd Management Area Plan. The HMAP is the only management document mentioned in the Code of Federal Regulations. The HMAP is the long-term management plan. BLM has replaced long-term management planning with 10-year removal plans. The legal mandate is to manage removal is an option, the mandate ignored. The HMAP would transparently address AML, AUMs gather triggers beyond just numbers. It would address the unique genetic equation of a herd and HMAP should address many things, even climate change strategies and fire fuels. And HMAP should also address identification of habitat needs for wild horse and burro use and how to protect that. That pesky part of the 1971 Act repeatedly ignored. From 2009 to 2016, I worked relentlessly to push HMAPs towards scoping. I won't go into all of the details of everything that happened at Fish Creek, I won't reiterate that every year I have made a request, every single year since 2017 to get that project back on track. I am refused each year because BLM has a preferred partner list and I'm not on it. But what I will say is that today, we should be presenting an outline of a project in its sixth year that shows all of those objectives are possible to meet. But instead, I sit here once again as a litigator, the type of person this board complains about, while I litigate in an attempt to

get transparent site specific long-term planning that said sites based equations. This kind of contention and contradictions is at the heart of the broken program that always says they want collaboration, but only choose a select few. Trust is irrevocably broken. Public relations messaging words won't fix broken trust fixing the program will and it starts with transparent Herd Management Area planning. I thank you for your time.

### **Colette Kaluza**

Colette Kaluza with Wild Horse Education and tomorrow our organization is publishing on its website an article documenting the abuse and neglect of wild horses during roundups. I have three important points to make. One, BLM is breaking the law by not creating mandated Herd Management Plans. The 1971 Wild Horse Act reads wild horses and burros shall be protected and considered in the area where presently found as an integral part of the natural system of the public lands. Therefore, BLM is mandated to prepare Herd Management Area Plans for the wild horses. There are 177 herds in the Western United States and all require management plans, according to their unique environments. BLM is further breaking the law by not allowing public participation in the preparation of Herd Management Area Plans as specified in the National Environmental Policy Act. Effective management planning would take into consideration genetic, variation, the fulling season, range management, road placement, habitat preservation, removal of fences to allow access to water and forage and also rethink the unjustifiable number of horses removed. Despite claims to the contrary, BLM is simply rounding up horses using helicopters and removing them in greater numbers than ever before in history causing unnecessary injury and death. Not to mention increasing our tax burden. This is not a management plan. Point two, probably the most important point, the only way to protect wild horses is to protect their habitats. Not to mention all the animals that share their habitats, which includes sage grouses, elk, milder, and mountain lion to name a few. The fact is livable habitat is shrinking due to profit-driven interest rates. And what is happening now is not a plan to protect their habitats and therefore is not protecting the wild horses. Point three, your mindset seems backward. A recent subcommittee session of your board called comprehensive ecosystem approach, seemed to speak only about wild horses as being responsible for destruction and not one mention of habitat loss. There was no talk at all about identifying what resources are critical to wild horse survival and how do we protect that. Your thinking seems to be that wild horses are destructive to human habitat and not the other way around. Your board seems comprised only of people connected to BLM and know people who truly care about wild horses and maintaining habitats to make their survival possible. Nevertheless, I still hope some advisor is listening in good faith and cares about the horses. Thank you.

Mr. Kuechle: Thank you. Okay, moving on. We're going to go to Lorna Torrey Palermo and then Deepthi Prasanna will be up next. So Lorna, you can now speak, you can unmute and begin when you're ready. Lorna, if you're with us and you can click the microphone, that should unmute you. Okay, we're going to pause on Lorna, if Lorna, if you're with us, we'll have our tech people message you and see if we can't help you get online. We'll go ahead and move to Deepthi Prasanna with Mary Hoffman on deck, so looking for Deepthi. All right. You are allowed to speak and you can unmute when you're ready.

### **Deepthi Prasanna**

Hi, I am Deepthi Prasanna. I live in Utah and I really want to address, you know, the AML numbers. The numbers in the HMAs are too low. They're not genetically viable. It's been proven that, you know, any numbers less than 150 causes genetic in breeding and so many other issues, but yet the BLM goes on and on and trying to round up, you know, horses in the same areas over and over again. I heard, I guess so yesterday about, you know, why would it be cheaper to haul in water? I would think it would be much cheaper to haul in water because drought is cited is one of the reasons for roundups. So why wouldn't we want to haul in water to keep the cost low, rather than pay for expensive helicopter roundups as well as long-term holding facilities, which I'm not quite sure there's a plan out there. And what's going to happen to the horses that are in the long-term facilities. Drought is not an emergency. It's predictable and it is BLM and Forest Services mission to protect the wild horse and burros and they need to manage for drought by removing livestock. I think we have brought it, we have several of us in the public have mentioned over and over again that when there is a drought, why aren't the livestock removed? I understand, you know, that livestock are meant to be on the land, but there's some revision of numbers, but still horses, the one that or burros are the ones that bear the brunt of any drought, basically. There are several HMAs that have horses that have thousand acres per horse to graze. The springs of fenced off, wells are turned off when the livestock are removed. And once again, why do not, why don't we put in wells for horses, burros, and other live livestock rather than expansive gathers? Why do we turn off the water when there's no livestock? I think we

have horses in... I guess the west has about 4% of land is used for horses and 150 million acres for livestock. So why would we not focus on protecting the wild horses and burros? Thank you.

**Mary Hoffman**

Hi. Thank you. My comments and recommendations concern the Adoption Incentive Program. Listening to your earlier discussion, I heard board members say that they did not have the proof supporting accounts of the AIP animals ending up in slaughter. And my question is, why was there no follow-up by the BLM? Not just of complaints received, but of the AIP adopters and locations of the animals in general. Another point struck me. While it is true that after the title has been transferred, the wild horse is no longer considered wild. Should that really relieve the BLM of any responsibility if that horse is sent to slaughter, it appears like legal cover for an outcome slaughter that is a majority of Americans what Americans do not want. To address public perception, consider suspending the AIP pending a full and transparent investigation of the program's linked to slaughter as requested by members of Congress. The American Wild Horse Campaign, AWHC, published a report this year, documented separate groups of related individuals who adopted multiple AIP animals and sold them to kill pence. The detailed report identifies these families by name, including the repeat offenders. The report was submitted to both the DOI and BLM and it can be found on AWHCS website, if you have not seen it. The BLM's enhanced protections implemented after AWHCS initial report are not solving the problem and have even weakened some of the language in the adoption agreements. Relax some of the rules and ignore other problems. Some suggested reforms include and the virtual compliance inspections and do only in-person inspections. Currently the adopter only has to send in pictures. Animals should be identified by BLM freeze brand or microchip, not by a physical description. Used voucher based incentives rather than cash incentives as you've discussed, change the way screenings are done. Instead of limiting adopters to a database of previous adopters, open the program up to new adopters that have been rigorously vetted. Screen potential adopters for a history of animal abuse or sale of animals to kill buyers. Stop the practice of local BLM offices, giving waivers, allowing more than four AIP animals to go to one address. Thank you.

**Stephanie Talia**

Okay, thank you. My name is Stephanie Talia and I love wild horses and I'm a concerned citizen. I'm here to discuss the need for reform for the Adoption Incentive Program. Many horses and burros going through this program are being dumped after title at kill pens. And while there may be many successful wild horse and burro placements through the Adoption Incentive Program, there's still a gap enabling many horses and burros to end up in kill pens with threat of shipment to slaughter along with wasted taxpayer dollars. A processing program is only effective, if you have the governance compliance and controls in place, otherwise, it's a program that's ineffective. I did raise my concerns about the program with the BLM and provided evidence and information by email and phone in August and September of 2022. And while I appreciate the BLM taking the safety and wellbeing of wild horses and burros seriously and continuing to strive to fulfill management responsibilities in a humane manner, more can be done. From the time of roundup and branding you and we the taxpayers are responsible for the horses and burros health, wellness, and longevity. Title of a horse or burro should not absolve the organization from the continued oversight in humane treatment and care. Perhaps this is outside of your charter and a legislative issue, but if it's a legislative issue, definitely things need to change. I would urge continued review reform of the AIP looking at both short-term and long-term reforms. Those that have no interest in giving the animals a good home should not profit from the program. Some short-term reforms I'd ask you to consider would be changing the length of ownership from one year to two or three years until the program can further be reformed. I would also ask that the BLM, if they're not currently doing this, also offer the nonprofits or trainers the horses at a discounted rate, so that they're safe. And then some long-term reforms, I would ask you to seriously consider would be annual review of the AIP program, doing root cause analysis, doing lessons learned and continuing to perform the program to close the gaps. As well as cross agency enforcement, banning prosecution and collection of funds, utilizing attorney generals in the IRS for individuals, sale barns and kill buyers that are abusing the system. The data's there after three years more must be done and then I'm not sure, if it's available or can be done, but touchpoints or follow-ups after titling to ensure that the animals are being cared for properly. The wild horses and burros deserve better. We can do better in reform and change of the Adoption Incentive Program as needed. Thank you, I appreciate you allowing me to voice my concerns and need for change.

**Dawn Johnson**

Okay. All right. Hi, my name is Dawn Johnson and I am from Bucyrus, Kansas. And I would like to start out by saying that I, unlike some things that have been said, I come from a long line of background of family that understands a lot about ranching and farming. My grandfather was a veterinarian, had a grandfather that's a breeder, one that was a cattleman, a hog farmer. So I understand a lot about land, animals, so I'm not just an advocate over the top advocate or someone who just likes to look at the pretty wild horses. So I would like to set that as a precedence of where I'm coming from before everything I have to say. I was planning on talking about just AML genetic viability, cal weights and different things. But I also would like to touch a little bit on the kill pens that have been just talked about as well. But I want to talk about it just a little bit because I have firsthand knowledge from the Kansas kill pens because I have worked with them for a number of years. Indirectly, but I know a lot about them. And it is real, and if you think that they are not, they are, there are many of them. And the Wild Horse Camp, American Wild Horse Campaign and their investigation was just the tip of the iceberg. Us as advocates that are very serious advocates that take this seriously can tell you that there are thousands and thousands of horses, wild horses that end up in these kill pens and many of them, you don't even ever see because the kill buyers don't advocate for them. They don't even put them online, they're too hot. You guys, as you know, the BLM gets called and you don't ever see them. They direct ship. So a lot of times what happens is, if they will work with other advocates across the country and it's all behind the scenes, but they are there. And there are many of us that know about it. And it is very real and I can vouch for that because I've worked with the kill pen in Kansas doing this for numbers of years as well as other advocates and we can provide many things for you. And they're all across the country. But for a few other things I just want to point out real quick because my time is going short. 127 of the 177 Herd Management Area are below genetic viability. And that is a serious concern with the roundups, the AUM when it was set. According to Colorado State University, cattle weights have drastically increased. So the AUM that you guys are using is drastically out of sync and those are just some serious things that need to be looked at and eight and things that need to be looked at when you guys are looking at different things with-

### **Joyce Purtzer**

Hello, my name is Joyce Purtzer and I'm in Colorado. I've grown up with horses over my life and my grandfather trained horses. I certainly appreciate the opportunity to comment here. As some people on the board have expressed the opinion, it's time to Congress step in and take a look at what is actually going on with the program. What I see, looking back is not so much a question of an overpopulation of horses, but the fact that the land, which was originally given to the horses has been diminished over the years. I also see that the program financially benefits a few and while much money is being spent, the actual care of the horses seems not to be adequate. I would mention Canyon City where the horses have died, I would mention Wheatland, which still has strangles. And as far as involving the states, the governor of Colorado, when the roundup was coming, offered to work with the BLM, there was land, state land available immediately in the area where horses could have been moved to. And rather than do that to the BLM, in fact moved up the helicopter roundup, which in itself was a travesty. There were horses at that roundup that were actually run into barbed wire fences. Fortunately, they did here. So, but a again, I would sincerely like this idea of state and federal partnerships to proceed, so that the horses can be kept as wild horses. People love the wild horses and come to see the wild horses. As far as the adoption program, 18 months is a long, long time. Horses should be available much sooner in order for them to be adopted and in right there, you're only taking them a very few horses. There needs to be some concern for the numbers of horses and I think they should be provided with public lands that have been taken from them, if not the lands that they were taken on that we have many, many state national parks where the horses could be relocated. I sincerely hope there can be some changes made to the program. Thank you so much for your time and I hope we're able to move forward.

### **Lorna Torrey Palermo**

Fantastic. Thank you for this opportunity. I'm Lorna. I'm in Oregon. As a point of agreement between all present to prioritize environmental preservation, I would like to speak to the environmental issues that are related to the management of our wild horses and burros and our public lands to promote a healthy ecosystem and protect the environment, while equines thrive in areas where they function in a symbiotic relationship with the natural flora and fauna of the region. Horses grazing style prevents erosion by leaving plant roots intact. Their single stomach digestive systems are uniquely designed to return much of the useful parts of the ingested plants to the earth. Many animals and native plants and grasses benefit from the wild equine ability to both recede and fertilize the land they inhabit, as well as reducing combustible forage, reducing the opportunity for wildfires, and also contribute to climate change that also contribute to climate change. The unique digestive system also sequesters large amounts of carbon back into the earth rather than releasing methane gas



into the air, like the digestive systems of the non-native cattle that now graze on most of the land set aside for the wild horses and burros. Kaufman at all January 22 document the environmental impact of grazing domestic livestock. Primarily cattle on 85% of public lands as having of the equivalent social cost of carbon impact of \$500 million a year, which is approximately 25 times as much as the funds raised from grazing fees. This impact is related to methane gas emissions, grazing style and ecosystem warming. They suggest that quote, "Cessation of grazing would decrease greenhouse gas emissions, improve soil and water resources, and would enhance and sustain native species biodiversity, thus representing an important and cost-effective adaptive approach to climate change." Western Watersheds Project pointed out that the current situation in the western states is beginning to mimic conditions that produce the dust bowl of the 1930s, we must act now to prevent this. Ripple at all 822 suggests a rewilding plan that removes livestock from just 26% of public lands. They propose rewilding both gray wolves and beavers to restore the natural ecosystem and contribute to protection from drought, and global warming. They document the fact that only 2% of the nation's meat production comes from all federal lands combined. Rewilding of our native wild horses in a similar manner would require careful planning. However, they are a keystone species, capable of improving appropriate ecosystems to reduce climate change. Rewilding is a viable alternative to holding facilities. February 22, a publication by Merci and Pollar confirmed through mitogenome reassembly the existence of horses on this continent 30 million years ago. It's-

### **Mindy Pless**

Okay. I'm so sorry about that. I was just a kid some 50 years ago when I heard about Wild Horse Annie's plight and the wild horses. Mine was one of the many thousands of letters received by Congress back then. Let's fast forward to today and I'm not happy the way things are going. Being a horse woman living just outside of Washington DC in the beautiful horse country of the plains and Middleburg every day as a fight to keep our spaces wild and open and full of horses. So I am back again to lobby Congress. The cost of rounding up our wild horses is in the millions, millions of our taxpayer dollars. It's time that the BLM is held accountable. The rationale for removing the horses. There's too many, they're starving. The truth is cattle and sheep are on our public land. The ranchers pay a pittance to graze their cattle in sheep. The ranchers feel that the horses compete with their livestock for food, water, and cause range damage. The ranchers will claim that they're feeding America and need to graze on our public land to do this. That's false. Less than 2% of all beef sold in the United States is raised on public land. If public land grazing ended tomorrow, it would have zero impact upon the beef industry. Currently, they're close to 60,000 horses and holding, this economy is not conducive to adopting this amount of wild untrained horses to the general public. It is not like there's an overwhelming demand. The cost of leaving the horses in the wild is zero. 80% of Americans want the horses to remain wild and free. That same 80% do not want their taxpayer dollars spent, like this anymore. The solution quite simple. It is time for the livestock to be removed from our public land. Let us end the grazing rights for livestock, retire these leases and rewrite it, that this land will be given over to the wild horses and burros and perpetuity and they're to be given status of living legends to be cherished. This is the way to preserve the land and our iconic symbols of the wild west. Thank you all so very much today.

### **Jane Giard**

Yes. Okay, I'm going to read. Okay. All right. Good afternoon. I'm Jane from Rhode Island. I'm an a retired educator with Pat's certification in equine-assisted services. I'm against the roundup's extensive incarceration of the wild horses and burros and the experimental, often inhumane sterilization of mares and stallions and contraceptive methods implemented by the BLM. The last independent scientific study is the 2013 National Research Councils. It's time for a new study. I suggest listening to the NRCS recommendations and I quote, BLM's Management Practices are facilitating high-rates of population growth. When the BLM lowers the numbers of wild horses and burros, they decrease competition for forage. This leads to population growth. So the BLM has created their own problem people, but unfortunately Americans taxpayers are footing the bill at \$70 million a year. And America's iconic wild horses in sweet burros are dying and losing their freedom. Next, I'd like to refer to the joint plan produced by Craig Downer and Anthony Marr. I encourage you to review their work on YouTube at Marr-Downer Plan. Both a renowned scientist in the respective fields of animal ecology and equine studies. Their plan will rewild all incarcerated horses and burros, remove livestock from the HMAs, eliminate helicopters, roundups, and fertility controls. It's too extensive for me to go into now. Finally, I'd like to know what research in the fields of equids does the BLM and forestry department have to support the following. Number one, the removal of 20,000 wild horses in order to get to their end goal of 26,600 on the range. Where are the HMAs for each? You don't have them. Shame. Have you considered the amount of stress these helicopter roundups have on these sentient animals? No, these are not gathers. Watch the videos widely on Facebook and Instagram in a attend a roundup, we gather

children from recess. The BLM is rounding up the horses in burros in a brutal manner at the cost of half a million dollars per gather. As was done in August when they captured 750. You are aware of the cult who broke its leg. What about the newborn fold that ran so hard? Its soft little hoofs were worn down to nothing. The NRDC study did not support the brutality of ripping out mare's ovaries on or off the range. Whose idea was this? Has any team taken into account the emotional effects on the wild horses and burros of separating family units during these roundups? I'm asking Congress and the BLM to forbid any funding be used for population suppression of equids, until BLM crafts individual HMAPs. For 40 years, they've yet to provide this critical document. Thank you.

### **Linda Kemp**

Hello, my name is Linda Kemp. I am volunteer with a grassroots organization saved by wild horses and several others. I thank the board for recommending an outside non-government third party to be retained to study and identify and make improvements in the wild horse program. In this light, it is extremely critical. We have a new National Academy of Science review. The report would look at the science that would be the glue, holding the future BLM planning together. A quote from the 2013 NAS. The wild horses program is facing a financial crisis because of the continuous gathers and stockpiling of wild horses and burros. When a thriving natural ecological balance is threatened, the report concludes, to continue business as usual will be expensive and unproductive for BLM and the public serves. Many of the same issues in the 2013 NAS report are still in the table. In this light, Congress can't be blamed for causing this mess. It rests on BLM. The agency didn't listen to Congress. Science are the American people. There is still a false narrative that promotes criminal that only promotes criminal acts against wild horses, like the Alpine horses yesterday. We urge BLM and the Forest Service to follow the science and take livestock off the HMAs. Cows have no place on our public lands and forest, designated for wild horses and wildlife. The multi-use policy does not pertain to pre-designated land use areas. Stop the roundups in the stockpiling of our horses, like was recommended. Be transparent with the long-term postures. Do the HMA plans and manage their Herd Management Areas principally for wild horses as the law states. America loves wild horses so much so our wild horses were picked as a modern day symbol to represent American Liberty by US Agency, the US Mint. In striking the commemorative liberty coin, the agency explains why wild horses were picked. They say, they are a bold and breathtaking representation, the determination and power of the passion of American Liberty. America's wild horses and burros deserve our respect and protection. They deserve their freedom to live on the lands that Congress appointed to them. All wild horses and burros deserve humane treatment and management by honest representation, by truthful and concerned agencies now and in the future. Thank.

### **Terri Law**

Hi, my name is Terri. Thank you. I live in California. I'm a science major and a concerned citizen. Horses and burros are being blamed for the degradation of a wild land when in fact they should be protected because of what they provide. Unfortunately, the biggest impact of the degrading of our lands at the BLM, et cetera, manages the livestock industry, which is really mentioned in reports that are talked about. There are thousands of tens of thousands, hundreds of thousands of domestic livestock, cows, sheep, et cetera. That are on a large percent of the land designated for animal usage. Horses have upper and lower insides that clip the grass, allowing it to grow faster. The digestive system does not thoroughly degrade the vegetation they eat, so they recede. Cows have a thick lip pad and grazed by wrapping their tongue around and pulling out the roots, which allows for the invasive sheet grass to grow, which is more flammable and destroys the native grasses, which the wildlife needs. They do not recede. Horses can travel far from water and food so they, it's soften the ground and the wildlife and vegetation to thrive. Cattle stay close to the water and food and pound the ground, so it's hard and the vegetation and water sources decrease. All of this affects climate change in our Western Watershed and native grasses, which help to clean our air, decrease fire danger and native grasses and our at, which are our forest, and they will disappear and become a dust bowl. We need to do better research, not by special interest groups, by people who understand the impact of these situations on our land. The horses and burro do not deserve to be left in feed lots holding areas in some private places where they often are not cared for and are sent to slaughter. Horses need to move over long distances, otherwise, they need hoof care, proper nutrition, teeth care, and they need to have their areas cleaned frequently, which causes issues. BLM does not have the manpower or the amount of resources needed to do this. This is much less expensive to leave as many as we can on a range of supplement in times of drought. The private lifestyle can be okay on less land. We need to stop the mismanagement of our land and rewild our lands to help our climate avoid the disastrous impact, it's going to have. The horses and wild burros, it's not their fault. These lands belong to all the citizens of this country. Most do not want to have large corporations and special inter groups in other countries and to

abuse our animals and the wild. This is an integrity issue for our government. I believe we can balance a need of fair as all involved. We really need to tell the truth of what's going on and create diverse board of people that are open and mind and are committed. To the future of the healthy environment. And not run by special interest. We need to stop the horses and burros as a scapegoat when they only take up a small amount of the land. Thank you.

### **Laurie Ford**

Okay. My name is Laurie Ford. I have owned burros for 35 years and my statements can be supported by FOIA and BLM zone data. Just one word. If you examine the on/off dates of grazing allotments within HMAs, year round, grazing is taking place only it rotates between the different allotments, but it's taking place year round, rotating just like the horses and burros naturally do. The BLM is not managing our horses and burros, but numbers on a spreadsheet. The product of decades have proven unreliable and flawed methodology, poorly documented data and aerial surveys, accounting for those present, but not seen statistically, especially with burros who are difficult to detect. By the time you reach your numerical AML, there will be virtually nothing left to manage. Every March, the HMA population where every animal not nursing is considered an adult is multiplied by a past growth rate to determine the following year's population. By assuming growth rates never change, the BLM is implying that factors that can impact that growth rate, age, reproduction, and survival rates, the ecosystem never change either. This method is modeled for horses not burros is problematic and despite it being the foundation for determining removal numbers has low priority in research. Burros are not even being aged in holding, a recent FOIA for records of the 800 burros from the blue in complex roundup looking for all those between eight months and two years responded, none fit that criteria. Data appearing on state and national spreadsheets is riddled within inconsistencies. The NAS flagged HMA estimates between the two as often not even matching by upwards up into the hundreds. Within a 30 day period, I found over 50% of 400 burros showing shift or adopted on state databases did not appear on the national database or vice versa. Burros still titled to the BLM are ending up in kill pens. Their value has increased by 2500% due to China's Ihu trade demanding close to 8 million slaughtered donkey hides a year and endangering the global donkey population. By the time we reduce ours to 2,900, we will have met the criteria for our wild burros to be endangered in our own country. And yes, someone can adopt a burro, kick it out in a field, and make money with the AIP program. An alarming number of applicants are adopting three and four burros and flipping them. Upwards to 30% of adopted burros remain untitled. I believe this is largely due to death, while burros have weakened immune systems, lacking the antibodies to fight common pathogens, exasperated by the stress of roundups.

### **Paula McNamara**

Good afternoon, Advisory Board. My name is Paula McNamara. I live in Rhode Island. I'm not a public speaker in any way, but I do feel it important to speak to you folks today. I have recently become aware of the plight of the wild horse in burro. The helicopter roundups, the penning, and the potential slaughter is horrific. I am now a retired RN who previously worked in labor and delivery. I ask any of the female Advisory Board members today who have given birth, if you were separated from your infant or if your infant were traumatized or injured in any way, how agonizing would that be? This is what is being done to these San chant beings. My anger further compelled me to read more and more. I found that many research scientists were out there, names probably known to you. Craig C. Downer, wildlife ecologist who has composed reserve design and Anthony Marr, another longtime animal advocate who together created the Marr-Downer Plan. In brief, they proposed closing these ridiculously expensive and unnatural holding pens, releasing the horses in burros to their legal native lands and reducing the cattle on these lands. The great sums of money now spent on roundup, feeding and vetting should be spent on habitat restoration and water creation. Let's add in another scientist, Robert Bauer, who wrote "A Biologist's Response to the BLM's Wild Horse Problem," analyzing the complex numbers that go into longevity and mortality of the wild horse and burro. The future population numbers projected by the BLM do not take into account male, female ratios, predation, environmental adversity in illegal wild horse and burro killings to name a few factors. These scientists all inform us that are willing to listen of the ecological restoration and maintenance done naturally via the carbon sequestering, fertilizing and receding with their waste, accomplishing wildfire reduction, et cetera. Cattle do not do this. In closing, I see three components. One, a truly emotionally agonizing interruption of nature. Two, a science that shows the wild horse in burro can manage themselves best without man's intervention. And thirdly, a needed change in the language of the 1971 Wild Horse in Burro Act. Wild horses have given us a lot. Let's give these magnificent icons of America. They do respect in legal lands. It's not too late. I respectfully thank you for your time and careful consideration on this most important decision. Thank you.

## **Victoria Williams**

Hello, my name is Victoria Williams and I'm from Denver, Colorado. As a very concerned citizen, I would like to speak out in behalf of our wild horses and burros. I've been involved with researching what is happening to this population for close to three years. And in that time, despite knowing thousands that have been speaking out against the treatment of our protected equines, there has been no change or accountability from the actions of the BLM. One pressing concern I have is the use of helicopters during roundups. Known to abuse, terrorize, and even cause death to our wild horses and burros. Chasing Amir and her one week old full across a hot desert with a helicopter is inhumane and cruel. Most often the BLM does not go back to collect the full, which will certainly die of starvation, if not rescued and cared for by someone other than its mother. Add to that image, the pregnant mare that aborts her fetus during the chase. Unconscionable and inhumane treatment, ripping families apart when it is the most important thing in the lives of these wild equines for no reason other than to provide ranchers with our public lands is horrific. These animals, supposedly a protected population, are scapegoated and targeted as destroyers of our public lands. Despite environmental research that shows the opposite. Environmental experts researching our public lands and wetlands also agree that wild equines are being targeted for problems caused by our problems caused to our environment by the ranching industry. Causations of range, degradation, according to the BLM's own analysis, show that cattle and sheep do far more damage to the range than do our wild equines. This is documented by what the BLM publishes on their website about the conditions of our range lands. Most Americans do not support what is happening to our wild horses and burros after digging deeply into the truth about what is taking place on our public lands at the expense of the American taxpayer. Last year in Colorado, after the BLM claimed the need for emergency roundups 145 horses have died in temporary holding facilities. The West Douglas Herd totally unvaccinated against BLM protocol. The Sand Wash Basin Roundup was conducted after our governor spoke out against it because he believed the horses were not in danger on the range. This blatant disregard for the lives of our wild equine is something that should be investigated, challenged, and immediately halted. Also very concerning are all of the wild horses that are in long-term holding. Each roundup adds hundreds more to these of horses, to these facilities, many never to see, be seen again by the public. These are beautiful horses living a tragic existence. The expense to the American taxpayer for the abuse of our wild horses in burros is a crime. Thank you for giving me the time to speak about some of my concerns. Thank you very much.

## **Ginger Fedak**

All right, thanks. My name is Ginger Fedak. I'm in Colorado. I am the Wild Horse and Burro Campaign Director for In Defense of Animals. I would like to address an important topic, PZP versus GonaCon. You may believe that all advocates are either for or against fertility control in herds. The actuality is that most of us are for the use of PZP when it is used correctly and in the herds where it makes sense. However, most of us are against the use of other methods that BLM puts into the bucket of fertility control. GonaCon, sterilization, IUDs and skewing sex ratios are all unacceptable for multiple reasons. I am extremely concerned with the use of GonaCon in our wild herds. It is being used more often now as the fertility control vaccine of choice by the BLM. At the PM roundup. We asked and we're told the captured mares scheduled for return to the range would get GonaCon. They were to be held for 30 days after that first dose to get the second dose before their release. The darting on the PI range is also with GonaCon. Why would the BLM use the in-completely analyzed GonaCon? When PZP has been proven safe, effective, reversible, and humane for over 30 years. GonaCon is still being studied. The use of GonaCon has already been shown to render some mares infertile after just the second dose. While Dr. Griffin tells us that sterility will not cause the wholesale genetic loss because of the recommended metapopulation analysis, we are concerned with herd genetic loss. As a degreed range animal scientist myself, I cannot understand how the forced in breeding caused by the limited progeny of drastically reduced breeding pairs will not cause genetic problems. I was pleased to hear that Dr. Gus Koran, an animal genetics expert was mentioned. I hope he is actively involved because he has said that a herd needs at least 150 breeding members to ensure genetic viability. Apart from that, GonaCon also also drastically affects the natural behavior of the wild bands, which is unacceptable. Visitors from all over the country and the world did not spend their money to come here to view wild horses with altered behavior like zoo animals. Our wild horse and burro, ecotourists, photographers and lovers of all things wild, want to observe our wild herds with their natural behaviors intact. It is a magical experience. Please make one of your recommendations to only use PZP as the fertility vaccine of choice in those herds where fertility control is a viable management tool. Thank you.

## **Linda Wallace**



Hi, I'm Linda Wallace. I'm from Oregon. I've been a lifetime advocate. I was a child who wrote letters in the Wild Horse Annie campaign that got the law going, and I was privileged enough to adopt a Wild Mustang in my 20s, which was a life-changing event. I wanted to talk about a couple things I've heard from these past three days of the meetings, and thank you for allowing us to be in them. I appreciate that. The main thread repeated daily seems to be that our wild horses are overpopulated and herds need to get to AML. But I haven't heard any discussion about reducing cattle grazing. In my mind, that's the real elephant in the room. Since the language of the 1971 Wild and Free-Roaming Horses and Burros Act states that HMAs be managed principally for these existing herds. The maximum AML is now set by the BLM at 26,785, which is less than the estimated wild horse populations when the 1971 Act was put into place to save the wild horses from extinction. Secondly, several board members have stated that things have changed since 1971 Act passed. Hinting that perhaps the 1971 Act is outdated. Yes, things have drastically changed. We in the West are experiencing extended droughts due to climate change that has now demanded our attention. Since we're needing to revisit and modify outdated practices. The first item on the list should be cattle grazing. As there are far more cattle grazing on public lands than there are wild horses, even on the ranges managed principally for the wild horses. According to a July, 2022 article in Inside Climate News, livestock grazing mostly by cattle is the single largest use of publicly owned lands in the West. Though the BLM doesn't release a headcount, researchers and advocacy groups say those permits represent about 1.5 million head of cattle. That figure indicates that cattle outnumber wild horses at more than 18 to 1. If you use the BLM estimate of 82,000 horses, this is from the BLM data on March 1st of this year, which I assume does not exclude the 20,000 horses removed this summer, which would change that ratio of 24 to 1 cattle to horses. J. Boone Kauffman, a professor of Fisheries, Wildlife and Conservation Sciences at Oregon State University said, "The primary cause of desertification in the arid lands of the West has been livestock grazing and continues to be so. Grazing on public lands has resulted in soil carbon loss, lower water holding capacity, less root mass to actually exploit the available water, a loss of species. All of these are exacerbated by the impact of climate change." According to the public employees for environmental responsibility. Press release from September of 2021 of the almost 22 million acres of HMA area within allotments that BLM has assessed. Only a tiny fraction, just 1% has been identified as failing standards due to wild horses alone, with no mention of livestock. So why are wild horses taking all the blame? Allowing private cattle to be grazed nearly for free on public lands was a privilege that originated more than 100 years ago. But since things have changed and public lands are to be managed for multiple use, this privilege has run its course.

### **Diane Tutas**

Okay. Hello, my name is Diane Tutas from Indiana. I've only had the pleasure of visiting two HMAs so far and wild horses on the East Coast. I've worked at one stable. I've also worked with veterinarians, assisting with drug testing horses at local tracks and several horse shows. It was a very eye-opening for me. My comments today are about the management plan, which the BLM has basically been using with little to no change since it has began. The BLM on website and the appropriation committee budgets show all of this in print. Most all of the money is spent on roundups and holding. We enter an educated country, yet we continue to keep doing more of the same. So the very act which should protect the wall declines, fails them. The current management plan, in my eyes, is an eradication plan with an expensive priced price tax taxpayers. I've heard of a proposal to have veteran star horses. I think this is a wonderful idea. The veterans are well trained. This would benefit the horses and burros, allowing them to remain on HMAs. It could also the benefit the veterans mentally and financially. As a stakeholder and a member of the public, these are my thoughts. I ask for humane solutions and treatment more accountability. We need better staffed and improved conditions in short-term holding. So the same thing that happened happened at Wheatland, Wyoming. And Canon City, Colorado do not repeat itself. We need more public transparency on all levels from the range to long-term holding. And I ask that only safe, proven birth control as like PZPs be used. I am against any invasive method that lead causes sterilization and isn't reversible. Birth control is underused. We need to end the path forward, which is creating unnecessary burden on the program, raise the low AML levels. The horse and burros deserve their fair share. If all the land is so degraded, then all multiple use must change immediately. Lastly, I asked that advocates and sanctuaries be given the same respect the BLM asked for. It would be nice if some more advocates or if advocates were on the Advisory Board, we have the knowledge, and this is America too. We must do better for the wild horses and burros of America. They deserve the treatment that the act provides. Thank you for your time.

### **Melissa Strickland**



Hi. Thank you for the opportunity to speak. My name is Melissa Strickland and I live in Utah. I'm with a grassroots organization, speaking on behalf of the wild horses and burros. I have a background in agriculture working with free range cattle as well as a lifetime of horsemanship. After attending two days at the Cedar Mountain HMA Roundup, it is very concerning how these animals are treated with the helicopter use and after in the holding pens, no rancher or horse owner would ever put their horse or cattle through that kind of trauma, nor would they want a horse that's been put through that kind of trauma. So how is it okay with a protected species? I also observed a lot of trash out at the Cedar Mountain HMA. It did not look like the public trash. It looked like the ranch is trash. A motorcycle was left right next to a natural spring. There was a barbed wire fence that was laying strung down on the ground, as well as a lot of strap metal laying around and sticking out of the ground. And the list goes on. Acres and acres of dried up cow pies and a now filled with cheek grass covered land. It does not look like public land. It looks like it's the ranchers land. Where is the integrity in how these HMAs are being managed? This is not just about the wild horses, it's about the land and the natural ecosystem that needs to be preserved. The combination of the corporate livestock grazing, mining, and pipelines is putting our public lands in danger. There are scientists with doctrines and masters who don't have any private interests in the BLM's, multiple use agency who have evidence that where wild horses are in good numbers and are not being replaced with cattle and sheep, you can find wildlife, native grasses and plants in abundance. Knowing this is devastating as a taxpayer, and I can speak for others that feel the same way. I feel fortunate that throughout my life, I have seen the wild horses running free. But at the rate the BLM is going with these roundups, I don't know if our future generations will be able to say the same thing. Coming from a background with cattle and someone who loves cattle and loves the lifestyle, I know there is a better way. There are people who have dedicated their life to learning, regenerative farming and preserving the native landscape, as well as ecologists that have spent their whole life studying how these natural ecosystems play a big part in preserving the planet, so that future generations can enjoy clean air, clean water, healthy soil, and clean food. I can only hope that our government will go from being the villain to being the hero that has restored our public land's, natural ecosystems, so that future generations can enjoy it. I will end this with a Cree Indian Prophecy. "Only after the last tree has been cut down, only after the last river has been poisoned, only after the last fish has been caught. Only then will you find that money cannot be eaten." Thank you for your time.

### **Heather Heller**

My name is Heather Heller. I am the founder of the Grassroots Group Save Our Wild Horses. I am a wildlife photographer and I currently reside in Hawaii. Over the last three years, I have visited 40 HMAs and HAs throughout the West. Two holding facilities. This is my third year participating in the Advisory Board meetings, and I attended the Cedar Mountain HMA Roundup in Utah last month. In the last three years, I have witnessed firsthand the damaged livestock causing to our public lands. And I have to wonder why the BLM continues to scapegoat the wild horses and burros for habitat and wildlife loss. It doesn't take a scientist to see what is truly happening out there, just some open eyes. I see more wildlife in the presence of wild horses than I have ever seen with livestock on our public lands. I've seen wild horses fenced off from water sources, ground fed springs, often just a couple hundred feet from creeks. Streams and rivers are fencing that are open to cattle and taxpayer funded water wells are turned off when livestock are not present. The decimation of our public lands is livestock caused and the BLM's own rangeland health data obtained via FOIAs show that to be a fact. Wild horse and burros herds were given principle use of their areas in the 1971 Act. Yet, they are being removed every year. And to date, 159 herds have been zeroed out of the original 329 herds in 1971, leaving just 170 herds left, many non-genetically viable. Take for example, the King Top HMA in Utah. In 2015, Robert Hammer spoke to a BLM WHB manager who told him that after a roundup there were just 25 stallions left in the HMA. As of the BLM population count in March of this year, there are just three wild horses remaining. I've visited several former herd areas, no wild horses to be found, but plenty of cattle. I am very concerned about the actions of the BLM on many levels. Experienced wild horse advocates and scientists have offered help and want to be a part of the solution, yet they are ignored year after year after year. Where are the annual range reports and they're required Herd Management Area Plans, the HMAPs. If wild horses and burros are meant to have principle use in the herd areas, then why are livestock and multiple use given precedence every single time? I see our wild herds disappear, wild horse herds disappearing, being blamed for forage issues, water issues, loss of mule deer, sage grouse. Yet it just isn't the truth. Our public lands for once beautiful places, and today they just aren't any longer. And one day soon it will be too late to fix that. Tough choices need to be made regarding livestock, mining and recreational use on every acre of our public lands, we need to restore and rewild the 26 million remaining acres that include wild horse and burro herd areas. Proper range management would certainly help with the budget issues. I just want to end this by saying that not all of us advocates are what you would refer to as crazy animal activists. Many of us who have spoken this week have years long experience and all we want to see is

healthy wild horse and burro herds on our lands for future generations to enjoy. Thank you for your time today.

Mr. Kuechle: Okay, thank you very much, Heather. Okay, so that concludes our online portion. We're going to move to the in-person and I'll just remind any of you that are speaking in-person, just again that there'll be a three minute countdown timer. So when you begin speaking, that timer will begin. We ask that you wrap up in three minutes, and of course, to be respectful, use manner, good manners, refrain from inappropriate language and personal attacks of board members. So one person signed up here that we haven't quite yet heard from them yet, and I want to determine if they're in the room. It'd be Lucia Anizuata. Nope. Okay. So we're going to begin with Brittany Thomas. Brittany, when you're ready. You just that you state your name, if you're with an organization and where you're from.

### **Brittany Thomas**

Good afternoon, everyone. My name is Brittany Thomas. I am from Prescott Valley, Arizona, and I wish to thank the board for granting me the opportunity to comment during this meeting. For the record, I have no formal affiliation with any special interest group or business. I am just a concerned stakeholder with a certificate in equine care and management. What's on trial is not horses and burros versus livestock and wildlife. It is Appropriate Management Level or AMLs for short versus horses, burros, livestock, wildlife, rangelands, and every stakeholder. AMLs are number set by the BLM that are supposed to represent how many free-roaming equines or burros are public lands can sustain. Horse herds over AML are deemed as being overpopulated and in need of reduction, at least in theory. In 2013, the National Academy of Sciences published a peer-reviewed report of the BLM Wild Horse and Burro Program. What the report highlights about AMLs is quite troubling. The report and brief states how Appropriate Management Levels are established, monitored and adjusted is not transparent to stakeholders supported by scientific information or amenable to adaptation with new information in environmental and social change. The BLM's modus operandi for the management of free-roaming equines remains largely contingent upon AMLs to this day. And I have yet to find any evidence that the bureau has amended these numbers in the nine years since the reports publication. The lack of credibility for AMLs may help to explain, for example, why Lake Pleasant Herd Management Area, which has been over AML for 21 years per the BLM'S own data has healthy plump burros. But Wheeler Pass Joint Management Area has had surprisingly frequent incidents of horses starving. Sweeping claims of overpopulation and under population can hardly be confirmed so long as AMLs are scientifically unsubstantiated management based on these numbers without conducting a scientific audit of them and changing them accordingly is irresponsible. Therefore, I implore the BLM to seek a review of AMLs by an independent scientific organization with no ties to any special interest group or business. Thank you.

Mr. Kuechle: Okay, thank you, Brittany. Up next is E. Thomas. Nope. Okay, so that concludes our in-person comment period time, and it concludes this segment of our public comment for the Advisory Board meeting of October 2022. We're going to take a short break before we move to our next agenda item. It's three, excuse me, 2:50 right now. So why don't we come back at three o'clock and we'll resume. Thank you.

**[BREAK]**

### **Finalization of Board Recommendations to the BLM**

Mr. Kuechle: So we've reached our final agenda item for the Bureau Land Management Wild Horse and Burro Advisory Board meeting for October, 2022. That final agenda item is the finalization of the recommendations that the board is putting forward. This is a conclusion of this meeting and the approval of those amongst the board. So I'll turn it over to our board chairs, Celeste Carlisle to move us through that process.

Ms. Carlisle: Thank you, everybody for returning from break and for the exciting conclusion of our meeting, which is the recommendations. Our plan will be to once again go through them and just make sure that we captured all the comments from before lunchtime and that the facilitators have made those comments as we hoped they would be interpreted as. So we'll just double-check them and then we'll discuss voting. Any questions before we begin? Okay, let's go. But first, Holle' Waddell is going to address us. I almost forgot that.

Ms. Waddell: Thank you, Celeste. Oh, I don't know what happens. Okay, sorry about that. I just wanted to come back earlier today, we were talking about Adoption Incentive Program and I stated that we would run some quick numbers, just

some digestible numbers. So I want to give those to you now. Since 2019, a total of 12,858 animals have been adopted through the Adoption Incentive Program. And of those 7,462 of them are titled. 4,768 of them are still adopted. And then these three categories, I'm going to explain to you, they are reassigned. And that is when an adopter is no longer able to care for animal and finds another adopter that gets approved through the BLM process of approvals, and then the animal is reassigned of that, there were 216 animals when an adopter elected to find another adopter and have the animal reassigned. Relinquished means the adopter has contacted BLM anytime between the time the animal has the person has adopted the animal and prior to the animal being entitled. So that can be six months, it can be two years. However long before the animal's titled an adopter can contact BLM to return the animal to BLM care. And that word is relinquished. And there were 358 voluntary relinquishment and then 54 repossessions. Repossessions is where an adopter has violated, one of the terms of adoptions or prohibited acts, and the animal is repossessed the private maintenance and care agreement, the contract between the adopter and BLM is canceled. Decision is made. A letter in communications are sent out. And oftentimes, it can result in the adopter being referred in the file being referred over to law enforcement. Again, that number was 54. So I just wanted to put that in perspective in our conversations regarding the Adoption Incentive Program. Thank you.

Ms. Carlisle: Thank you, Holle'. I appreciate that a lot. It is a giant program for sure. All right, I'm going to lead right into the recommendations as we are down to the wire with flights to catch. We believe the BLM and the USDA Forest Service should educate Congress about the complexities and budgetary limitations of the Wild Horse and Burro Program. To that end, we recommend the following. So again, within the BLM and Forest Service structure and collaboration subcommittees, the recommendations are as follows. One, the BLM and Forest Service should centralize Wild Horse and Burro Programs and institute organizational changes that would increase their program effectiveness. A, the Advisory Board recommends that BLM and US Forest Service provide operational responsibility specific to the Wild Horse and Burro Program in a manner that allows for increased operational control from headquarters, making it a priority to address national, state and district coordination efforts, so that opportunities for better coordinated, mission aligned plans can be implemented. For example, following the Forest Services fire management model when the need for emergency gathers arises. B, there is a strong need to address long-term budgeting of Wild Horse and Burro Programs in order to provide continuity for long-term planning. For example, creation of a centrally administered, separate budget for emergency gathers, which now occur annually, could help states implement strategic gathers that involve removals coupled with application of contraception prior to release. Funding for the US Forest Service to similarly manage their wild horse and burro population should also be established.

Dr. Lenz: How would you like to proceed with this? Would you, as we go through these, would you like to vote as we go through or do you want to go back and do them in aggregate? How would you like to proceed?

Ms. Carlisle: Well, if we could vote as we go through, that might streamline our process, if everyone agrees. And do we have Steven Yardley and Vernon Bleich on our communications channels? because they're going to need to weigh in.

Dr. Bleich: Yes.

Mr. Yardley: I'm on. Can you hear me?

Ms. Carlisle: Yes, we hear you. Okay. Just checking. So does everyone agree, we'll go ahead and just cut through? All right. Well first and foremost, are there any changes that we need to make before we-

Ms. McAlpine: One the last two lines under Originally, funding for the USFS. Wild horse and burros was 1C.

Ms. Carlisle: Do we have someone operating over there? Mr. oh yes. Yeah. Oh, correct. Thank you.

Ms. McAlpine: Okay, sorry. I guess my, I forgot to turn on my microphone, but the last two lines, under 1B. Originally, funding for the US Forest Service was 1C. It now got put back into 1B.

Ms. Carlisle: It's now C. Look on your screen.

Mr. Kuechle: Please speak into the microphone, so we can all hear it.

Ms. Carlisle: Yeah, we won't hear it, unless it's in the microphone. The after the letter A, 1A should be capitalized.

Dr. Lenz: Yes. Just capitalize it.

Ms. Carlisle: Anything else?

Dr. Bleich: Organization changes should be organizational changes.

Dr. Lenz: Do we need to make a motion or anything?

Ms. McAlpine: Madam Chair, may I make a motion that the Wild Horse and Burro Advisory Board accept the recommendation as previously read with the change of funding for USFS, as I previously mentioned became C as it now shows.

Ms. Carlisle: Yes. Let's take that motion. Any seconds? And any other changes as well? Okay. Yes, Commissioner French adds. Okay. Motion is seconded. So shall we take a vote? I believe that's what we have to do. Let's do by raise of hand. Oh, we can't see Vern or Steven. Let's go around the room.

*All board members accepted the recommendation.*

Ms. Carlisle: Thank you. The cow says Aye as well. All right. The motion carries with a, I cannot think of the word, unanimous. Thank you very much. Who's reached the end of their day? Unanimous. Yes, vote to 1A, B and C. Let's go ahead and move to Humane Handling and Communication. Sorry, you guys know it takes me a while to get the hang of this. All right. In an effort to obtain clear, consistent, and useful information that agencies can utilize for investigations, the board recommends that the BLM and Forest Service develop a definitive reporting process for the public to report Comprehensive Animal Welfare Protocol or other complaints or observations. The process should include a well-publicized, easy-to-find online form with detailed questions to help clarify the nature of the complaint or observation. For example, category of complaint and perceived CAWP violation, time and location, observations made, ability to upload photographic or video evidence, list of witnesses, personal contact information for follow-up as needed. Responses or timely updates should be provided in a transparent fashion to the original reporter and to the public in general. Data gathered through this system should be stored in a database without personal contact details to more efficiently track the nature of complaints, observe trends, and better address challenges that emerge. Any comments on generality or grammar? Okay.

Ms. Waddell: I just want to clarify in this, it still has the report, CAWP, and I just wanted to be clear when you know, we're thinking about, okay. You get it. Okay. Thanks.

Ms. Carlisle: Cut to spell it out.

Ms. Waddell: Either that or I was just going to say complaint, I mean. Right, because the members of the public are not rating anything regarding the standards or any of that.

Ms. Carlisle: Oh, okay. So Tori, if we can just eliminate CAWP or other, so it just reads the public to report complaints or observations. C-A-W-P, sorry. Or the report to report complaints or observations. And then in the, for example, in the parentheses, just eliminate. Thank you. All right. Anything else?

Dr. Bleich: I really think it would be wise just to report complaints or observations of potential violations. This is merely inviting public input that may not be at all related to the subject at hand.

Ms. Carlisle: I see. Yep.

Dr. Perryman: It gives it the opportunity to just say, I don't like bananas, right.

Ms. Waddell: Might I just make a suggestion. Well, we're talking about violations of animals that are adopted. It would be pretty simple, I think, to relate those violations to terms of adoptions or prohibited acts. Or adoption requirements or something a little more specific. So we're not getting phone calls of animals that are adopted or-

Ms. Carlisle: Right. But do we want to limit it to only adoptions or if someone goes to a gather and they want to report that it was 115 degrees and the gather was continuing, here's a place where that could get it be captured, so yeah. Do we want to say generalized welfare violations or yeah, okay.

Ms. McAlpine: Violations of humane standards.

Ms. Carlisle: Potential violations of...Welfare violations or terms of adoption... Complaints or observations of potential violations of welfare or adoption.

Ms. McAlpine: Welfare violations.

Ms. Carlisle: Don't worry public, we're going to do a really good job in a second year. Let's just have Commissioner French read from to report complaints or observations and say where he wants changes. The cursor is on it.

Mr. French: Report complaints of animal, animal welfare complaints or terms of adoption violations.

Dr. Bechert: Yes. That's what I was going to say.

Ms. Carlisle: Hang on, wait till we're done with this.

Dr. Perryman: I think you get the word potential in there because we're not talking about, I mean-

Ms. Carlisle: To report potential animal welfare complaints or terms of, okay.

Ms. Carlisle: Dr. Bleich is somewhat happy.

Ms. McAlpine: Okay. I motion that the board accept Humane Handling and Communication recommendation number two with the changes as indicated in line three. That's now before us.

Ms. McAlpine: With all changes before us.

Dr. Bleich: The way that sentence now reads. "Report potential animal welfare complaints or terms of adoption violations. The sentence does not read correctly. They would report potential animal welfare complaints or adoption violations, not terms of adoption violations.

Ms. Carlisle: It is animal welfare or adoption violations. How many board members does it take the screen label?

Ms. McAlpine: So I've made the motion and I will amend my motion to say as read by the chair with the changes now in front of us.

Dr. Bleich: Second.

Ms. Carlisle: Who seconded it? Dr. Bleich seconds the motion. Shall we have a vote on Humane Handling and Communication, number two?

*All board members approved the recommendation.*

Ms. Carlisle: Board passes number two unanimously. All right, let's scroll down to number three. Cross your fingers everybody. The Board recommends that the BLM continue to investigate vouchers as incentives for the AIP program,



require that AIP adopters demonstrate that their animals have been gentle can be approached, haltered, lead, tie, pick up feet at a minimum, adoption and/or online sale criteria should be amended to include adopters' experience with equine, their intent in adopting or purchasing, for example, performance, trail, or pet and quickly respond to the stakeholder group suggestions and concerns expressed during May and June, 2022 facilitated meetings. Dr. Lenz has a suggestion.

Dr. Lenz: The first time you use AIP, I would spell it out and then put AIP in parentheses. On the top line. The top line's. The first place you use it. Top line's. The first, yeah. There you go. At the end of that, spell it out and then put, there you go. And then the rest of the time they understand what it is.

Dr. Bechert: These are good points to include, but they seem kind of jumbled to me and maybe they could be ordered chronologically. So first would come adoption and online sale criteria and then the statement about demonstrating that their animals have been gentle could come after that and be a requirement for receiving title. Something like that.

Ms. Carlisle: Yeah, I see what you're saying. And Tori seems to have caught it very quickly. Before require that AIP adopters. Dr. Bechert, what was the last thing that you suggested? Their intent in purchasing.

Dr. Bechert: Yeah, intent for purchase should be right after online sale criteria because it's part of the online sale criteria. And then that the demonstrate that their animals have been gentle would be part of before you receive title.

Ms. Carlisle: Demonstrate that their animals have been gentle.

Dr. Bechert: Prior to receiving title-

Ms. Carlisle: Before receiving title, or prior to receiving title. Okay. Everybody give it a grammar read. Dr. Bleich.

Dr. Perryman: Take the word program off after the first AIP. Yes.

Dr. Bleich: Yes. I think the correct spelling of led might be L-E-D in this case. And rather than L-E-A-D. And since other verbs approached halter, led, I wonder if tied should be in the past tense. And I would say and pick up feet at a minimum.

Dr. Bechert: Just one more thing. The use of semicolons to separate key parts of the statement. So after the first statement and abbreviation of AIP, there could be a semicolon. Yes. No, then there's, you know, adoption and on sale criteria and that goes all the way to right before require that AIP adopters. That would be another... So kind of separating, you know, vouchers. Yeah, adoption and then-

Ms. McAlpine: Madam Chair, may I make a motion that we accept? I just lost what number it was, three. Humane Handling and Communication Recommendation number three as it stands before us. Yes. You may make that motion. Anybody second that lots people second that. All right, let's go ahead and vote on who agrees with this statement.

*All board members approved the recommendation.*

Ms. Carlisle: Thank you very much. The motion carries unanimous. Yes. Vote for number three. I'll learn by the last one. Number four. Many experienced and responsible community resources have indicated a strong interest to work with BLM and Forest Service in the best interest of wild horses and burros. The board recommends that the BLM and Forest Service investigate an agency avenue to build local partnerships or coalitions to support wild horse and burro care, ensure compliance and provide post-adoption support. These efforts should include. A, establishing a community of successful adopters to share knowledge and resources. This could be online. B, partnering with organizations that already train horses, such as university equine programs, Mustang Heritage Foundation. C, reviewing the inspection process and requirements. And D, identify someone who can provide the programmatic support for these activities. Any grammatical or other comments so far?

Dr. Bleich: A semicolon following requirements.

Ms. Carlisle: Semicolon following requirements? Tori got it. She's fast.

Dr. Bechert: Minor, but just e.g. for example, in front of university. Just to not limit it.

Ms. Carlisle: Very good. Nope.

Ms. McAlpine: I almost take to bring this up because we have worked so high, would it be the appropriate place to add wild horse and burro nonprofit agencies?

Ms. Carlisle: That would be the appropriate place to add that. Anyone else-

Ms. McAlpine: May I ask that we add that?

Ms. Carlisle: In the e.g., university equine programs, Mustang Heritage Foundation, wild horse and burro advocacy organizations.

Ms. McAlpine: Works for me. Thank you.

Dr. Bechert: Period at the end.

Ms. Carlisle: Period after activities. Call the vote. Let's make a motion.

Ms. McAlpine: Madam Chair, may I make a motion that under Humane Handling and Communication number four as amended as read and amended before us, that we accept that recommendation.

Ms. Carlisle: Do I have a second? Yes we do. We will go ahead and call the vote for number four in favor or oppose.

*All Board members approve the recommendation.*

Ms. Carlisle: Got it. Unanimous. Yes, vote from the board for number four. Last two, everybody. Ecology Subcommittee recommendations number five is the board recommends that the BLM and US Forest Service work with the USGS scientists to identify HMAs and Territories that will provide a statistically meaningful sample with which to test and validate the PopEquus model, under a diversity of field conditions and that efforts begin immediately.

Dr. Lenz: I would that spell out USGS. United States Geologic Survey.

Dr. Bleich: I think a comma is needed after field conditions. It's pretty much an independent clause. 'And that efforts begin immediately.'

Ms. Carlisle: Okay. I'm just giving people a second to read it. Do we feel pretty good about this?

Dr. Perryman: Madam Chairman I move that we vote to accept or not accept this motion?

Dr. Bleich: I second.

*All board members accept the recommendation.*

Ms. Carlisle: Got it. Final recommendation. Measurable objectives outlining targeted reproductive growth rate reduction and multi-year plans for individual HMAs or territories must be developed as robust and meaningful portions of all gather plans. Safe and humane fertility control treatments must be combined with every gather operation, whether or not AML is immediately achieved. The strategy will implement some measure of fertility control immediately has the potential to slow the rate of population increase, and may reduce overall numbers of horses or burros that require gathering, and has broad public support.

Ms. Carlisle: We were missing a word somewhere or a comma or something.

Dr. Bechert: The last sentence is really long and I think that this wouldn't reduce gathering necessarily, but what was there earlier was disrupting the cycle of repeat, removals and long-term holding that seems to have disappeared.

Ms. Carlisle: That's true and that was an important part.

Dr. Bechert: I think that's more impactful. Yeah, I would put it after immediately because all the rest of that sentence is kind of repetitive. This fertility control has the potential to slow the rate of population increase, but I don't think we need to say that.

Dr. Perryman: It's the definition of fertility control.

Ms. Carlisle: All right. So... And Dr. Bechert, after the word immediately, will you tell Tori what to put there?

Dr. Bechert: And disrupt the cycle of repeat, removals and long-term holding.

Ms. Carlisle: And then are you all advocating to remove the entire ending?

Dr. Bleich: As a population biologist and ask that the reproductive biologists on the panel or on the board. Explain what reproductive growth rate reduction is. I have never heard that phrase before and I do not understand it.

Ms. Carlisle: Well, what it makes sense to just say, what we're trying to say is not just a number of mares that receive fertility control treatment, but that a plan is developed that has a measurable objective. For example, the growth rate is 20%. Next year, we would like it to be 15% and the following year, we would like it to be 10. So this is the amount of treatment necessary to achieve that.

Dr. Bechert: Or you could just say targeted fertility control and multi-year plans.

Dr. Bleich: That is much more easy to understand. And as it was explained to me, you know, I got where you were going, but it's a phrase that I had never ever heard, you would target reducing population growth. But anyway, I'm very happy with that change.

Dr. Perryman: I move that we accept number six.

Dr. Bleich: I second.

*All board members approve the recommendation.*

Ms. Carlisle: Okay. Thank you very much.

## **Conclusion**

That concludes the recommendations portion of the meeting and it almost concludes the meeting, except that I have a few more words, which is that we have three positions that end their terms very soon, Saturday. So I would like to thank the three board members who are rotating off term wise. They do have an opportunity to reapply, but perhaps not everyone has chosen to. So we want to definitely acknowledge and recognize their work here on the board. Working on the board is a relatively thankless task. It can feel that way. It certainly isn't that way, but it's a hard place to be. It's trying to be critical and it's trying to listen to public comment and it's trying to use all of our areas of expertise. This board works incredibly well together, very respectfully to listen to one another. And there are true friendships on this board. I am deeply appreciative and I would love the opportunity for these folks who are rotating off to get to have a few minutes here to say, whatever they would like to say. So I'm going to hand it off to those folks who are streaming in first in case something happens to our feed. And go ahead and let Dr. Bleich say a few words.

Dr. Bleich: Thank you, Celeste, and addressing this to my fellow board members. I was very pleased to have been able to serve with you and I have the utmost respect for your dedication to the effort to provide meaningful input. I extend that respect and appreciation to the BLM staff, all of whom are burdened each day with administering a program that is so fraught with emotion and political meddling that the frustration must sometimes become almost unbearable. Thank you all for your dedication to this difficult, but worthy task. I was pleased to hear that there may be some congressional staffers watching and listening to this meeting. I'll say a word about that later. Congress has declared wild horses and burros to be a part of the natural environment and that management direction was to ensure a thriving ecological imbalance. That declaration, however, was not based on any aspect of ecology or population biology. Instead, that declaration was based on political expediency or political pandering. To again paraphrase, a former chief of the Forest Service. The existing situation is a problem that Congress created and that only Congress can fix. It will take legislation to do that. Some comments specific to the remaining members of the board and those that may be serving, again. Please take the opportunity whenever it is appropriate to rebut misinformation that is conveyed during public presentations. Failing to do so merely brings credibility to any such misinformation. I heard numerous examples of such types of that information over the past several days. As you are aware, I have decided to not seek reappointment to the Advisory Board. Although the board serves a worthy purpose and has the direction and the opportunity to provide meaningful recommendations to the agencies. I believe that my efforts as a scientist, as an advocate for ecological integrity, has greater potential to be effective as a citizen than when being constrained by bureaucratic trivia like FACA and similar legislation regulations or by political expediency. With that in mind, I'd be happy to chat with any of the staffers that might be observing or have observed parts of this public meeting and heard my remarks. Thank you though to all of you again, both on the board and with the bureau and for the effort put forth, especially by the agency based personnel that face these issues on a daily basis. Rest assured that the health of the public rangelands and the creatures that depend on them will remain as my priority. And I do hope that our paths will cross at some point again in the future. Thank you.

Ms. Carlisle: Mr. Yardley. We thank you for your term of service and we know you're awfully busy right now, but if you have any words you'd like to say.

Mr. Yardley: Yeah, this is will fulfill my second term serving on the board for the past six years, it's been real privileged rubbing shoulders with the professionals with their expert in their fields of expertise on the board. I feel like there's a lot of knowledge and a lot of wisdom that's shared and a lot of thoughts that are conveyed to the public. A lot of things that have been thought out, and we come from a lot of different aspects and come with a lot of different views to the board. But I feel like there's been good cohesion in the board and striving towards solving problems that the BLM faces, as Dr. Bleich said largely from Congress. And I hope any congressional speakers listening will hear this. There is a ecological catastrophe that's occurring, that's been kicked down the road for the past six years and many years prior to that. And unfortunately because of the nature of the animals reproduction, the problem is becoming worse, not better. And there are thousands upon thousands of acres that are being compromised. And the habitat of not just the horses and the carry capacity, not only the horses, but also of the wildlife, the upline game, and the producers and other people who utilize that range land and depend on it for both their livelihoods and for their enjoyment. And I hope that Congress will wake up and realize that the act in its entirety holds the key to the understanding of what to do for excess file force numbers. We can't hold up the act in part and then expect it to work in its entirety. There is a system provided in the original act that makes it possible to not have large amounts of forces and long-term hold in short-term holding facilities. So we need to use it in its entirety. And I hope that the BLM will continue to listen to the recommendations of the board and the future board members. I feel like the hands of those that are currently on the board and the minds are in the right place and they have the right desire and they want to see things happen. And I hope that the BLM will take that into consideration. Also, really quickly, while I have you on the phone, the Adoption Incentive Program, I know there's been a lot of outcry from a lot of pro advocacy groups that the Adoption Incentive Program is to streamline horses, to laughter facilities. And nothing could be farther from the truth. The whole reason and inception of the Adoption Incentive Program was to place wild horses in the care of private individuals and give them an opportunity to give them a home where they're loved and cared for and watched after. And I hope that the BLM will continue this. It's a win-win for both the Mustang, for those that are wanting to adopt Mustang and for United States government in tax savings. So I hope they'll continue on with that. And with that, I will turn the time back in. Thank you.

Ms. Carlisle: Thank you, Mr. Yardley. We appreciate your time over these past days when you've been needing to be out and about. And for your service, especially. Ms. McAlpine.

Ms. McAlpine: I'd like to say thank you to all of the BLM staff for helping me as a volunteer understand a huge volume of information with such trust and graciousness. I've learned something every day from almost every one of you. Thank you to David and Holle' for opening communication lines between management and the Advisory Board. It saved us this year. It truly did. A special thank you to Holle' for showing me we are the shutoff switches on my cell phone. I have learned, I've had that phone for three years. So thank you very much. Now you have to show me to turn it back on. Anyhow, Dorothy Booth, what can I say about you? You know, you are a never-ending source of support, good nature and really reinforcement for us. So thank you very much. And I'd also like to thank all of my board colleagues, including the two that are not here with us in-person today. You have all spent hundreds of hours each year. You know, they respect each other. They share skills and experiences. They have shared so much knowledge with me outside of my expertise. They worked together as a team. They brought many viewpoints into balance and we managed to come together and make recommendations with in good faith and a lot of times within a sense of humor at our mistakes. So thank you guys all very, very much. It has been a fabulous experience. So thank you.

Mr. Yardley: I failed to thank Garcia and all the other staffers who have been very supportive of the board and for all of their help and all of the BLM specialists and their expertise. There's a lot of knowledge and wisdom in their hands too. And I hope Congress will open it up, so that they can utilize all the tools in the toolbox and do the things necessary to be the Bureau of Land Management and manage the Amy Land resource that they've been charged with. So thank you to all of them.

Ms. Carlisle: I'll close out my remarks by just saying yet again, thank you to all of you Forest Service and BLM and all who have come and the public for participating both online and in-person. Again, I'll say I stated yesterday, it's not easy to make public comments. It's a frustrating process to begin with to try to figure out how to be involved, but it is really important. And so thank you for coming and for participating. Thank you to our hosts and thank you to the board. I'm going to close it out by letting Dr. Drotar if you have anything to close out Forest Service. And then I'll hand it over to you all at BLM.

Dr. Drotar: With the Forest Service, I just want to express thank you for all of you, for your hard work and for your thoughts and for listening to everybody public and agency. I really look forward to working with all of your recommendations and all of you in the future. So thank you very much for allowing me a place at the table.

Dr. Jenkins: I think citizen volunteers on FACA committees are extraordinary and I wanted to thank you all and thank you Vernon, Dr. Bleich for serving and Steven Yardley and Ms. McAlpine. And you can re-up has it already closed or our nominations. I think it has sometime in September. But I think you're all extraordinary and I'm personally happy you're all here as a group. I think our publics are extraordinary and even though, there's disagreement about what to do, I think, it's absolutely vital that they have the opportunity to give their opinions about what they think we should do. We have, we attempt to manage public lands and we have to take into account, not just lands, but publics and not just lands and publics as separate categories, but as combined categories. They are thoroughly combined empirically and they should be thoroughly combined in how we think about lands and people. We don't have separate lands and separate people. We've got couple human and national systems. That's what makes it, not rocket science, but really complicated rangeland science that Dr. Barry Perryman talked about earlier. But, so thank you all and I wanted to thank Forest Service for coming and sitting with us this time. I hope this is a continued practice. I wanted to thank of course the National Training Center. We still have the director here. Thank you very much for hosting this meeting. Maybe we can do that a again, another time. It's been a great meeting here. Who else do I want to thank, first Holle' next to me. She knows I'm always appreciative of Holle' of it and her staff, which who are also extraordinary. And sometimes we hear and we are frustrated by hearing that as members of this organization, the BLM and as people, that we don't care about what we're doing. We deeply care. And folks should know that. We care as an organization and we care as individuals about landscapes, about horses and about people. So thank you all for your dedication. I think that's all I have to say for us all Celeste, and back to you.



Ms. Waddell: No, I just echo what David said and thank you all and to the outgoing board members, Vern, I owe you a phone call. I'm going to call you.

Dr. Bleich: I don't know if that's good or bad, but I'll look forward to it.

Ms. Waddell: No, but seriously, I think, this was a really good board meeting. Obviously, it's my first in-person board meeting as Division Chief and so, you know, I definitely had some concerns about, you know, what this was going to look like. But I think it went really well. I've enjoyed the conversation and a good set of recommendations. So thank you and looking forward to planning that second meeting this year.

Ms. Carlisle: Fantastic. And finally to Langdon Group for facilitating us and doing a lot of things in the background that you all have no idea. But we would be dead in the water without, so thank you very much Bryant, Tori. I don't know if you had somebody else from your team here and if you did, they were magical. Like elves, you all are like elves. So thank you very much. And do I finish this out or is it the DFO? It's me. Well, heck, combined meeting adjourned.

**[Adjourn]**