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**JULY 20, 2023**

**Deb Haaland**

Secretary

U.S. Department of Interior

Via: Department of the Interior, 1849 C Street, N.W., Washington, DC 20240 and

<https://www.doi.gov/contact-us>

**Jon Raby**

Nevada State Director

Bureau of Land Management

Via: Fax at 970-256-4997 and [jraby@blm.gov](mailto:jraby@blm.gov)

**Rep. Dina Titus**

Representative, NV-1

U.S. House of Representatives

Via: 2464 Rayburn House Office Building, Washington, DC 20515 and

[ryan.radulovaki@mail.house.gov](mailto:ryan.radulovaki@mail.house.gov)

**Rep. Tom Tiffany**

Chairman

Subcommittee on Federal Lands

U.S. House of Representatives

Via: Fax at (202) 225-0534 and Committee on Natural Resources, 1324 Longworth House Office Building, Washington, D.C. 20515

**RE: Request to Immediately Suspend the Antelope Complex Gather 2023**

I'm writing on behalf of the national animal protection organization Lady Freethinker to demand that the Bureau of Land Management immediately halt the current gathers of wild horses in the Antelope Complex in Nevada.

We have urgent concerns that the operations are being conducted in egregious violation of the Wild Free-Roaming Horses and Burros Act of 1971 and in a way that immediately puts federally protected wild horses at grave risk of injury or death — specifically given that operations are being conducted during documented and projected excessive heat warnings for the area and also have amassed a gruesomely high death toll within the first week of these operations.

The National Weather Service has issued extreme heat advisories for the Elko District, where the Antelope Complex-North roundup is operating, with temperatures expected to reach highs of 105 degrees on Sunday, July 30 and to be in the high 90s for the foreseeable future.<sup>1</sup> Excessive heat also has been recorded in the Ely District, with temperatures topping 90 degrees in the Antelope Complex-South.

The BLM has recognized widely that gathers should not be conducted when temperatures exceed 95 degrees<sup>2</sup>.

The current conditions are not “humane”; rather, they are clearly hazardous to the health of wild horses, as evidenced by the extremely high death toll from this roundup to date.

As of Tuesday, July 18, eleven wild horses had been killed between the North and South bases — including four wild horses who broke their necks and a stallion who fractured his leg while jumping out of the trap site on July 13.

Lady Freethinker’s observer, who documented that stallion’s escape, noted the severely injured animal ran for almost an hour, covering almost four miles, before being shot to death on-site.<sup>3</sup>

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<sup>1</sup> <https://www.weather.gov/lkn/>

<sup>2</sup> [https://www.blm.gov/sites/blm.gov/files/uploads/IM2015-151\\_att1.pdf](https://www.blm.gov/sites/blm.gov/files/uploads/IM2015-151_att1.pdf)

<sup>3</sup> <https://ladyfreethinker.org/lft-investigates-6-horses-dead-in-first-week-of-nevada-roundup/>

BLM daily gather records also note that two other animals have jumped over the fences, risking preventable injury.

As of Tuesday, 1,087 horses reportedly had been gathered. At this rate, by the time the BLM reaches its goal of 3,107 wild horses to be removed, a projected 31 wild horses will be dead.

This is completely unacceptable and a clear violation of §1331 of the Wild Free-Roaming Horses and Burros Act of 1971, which states, “It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, **harassment, or death**; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands.”<sup>4</sup>

We implore you to immediately terminate the gather operations in the Antelope Complex, given the excessive heat and monstrous death toll little more than a week into this gather.

We — as well as the more than 54,191 Americans who have signed our petition<sup>5</sup> — also implore the BLM to immediately cease these cruel helicopter roundups and find more compassionate alternatives.

The BLM asserts frequently that the agency is committed to conducting “safe, efficient, and successful wild horse and burro gather operations while ensuring humane care and treatment of all animals gathered.”<sup>6</sup>

We assert that it is simply not possible to conduct a “humane” helicopter-assisted gathering. As early as 2008, the Government Accountability Office noted that “broken limbs or injuries sustained accidentally” were the leading cause of wild horse deaths during helicopter-assisted gathers.

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<sup>4</sup> [https://www.blm.gov/sites/default/files/programs\\_wildhorse\\_history\\_doc1.pdf](https://www.blm.gov/sites/default/files/programs_wildhorse_history_doc1.pdf)

<sup>5</sup> <https://ladyfreethinker.org/sign-stop-cruel-and-deadly-helicopter-roundups-of-iconic-wild-horses/>

<sup>6</sup>

<https://www.blm.gov/press-release/bureau-land-management-conduct-nuisance-wild-horse-and-burro-gather-pahrump-nevada>

Our analysis of 20 helicopter-assisted roundups in 2021-2022 also revealed that the 245 wild horses died in that single year — with at least 33 killed following gather-caused injuries, including broken necks, broken backs, broken legs, and unexpected heart failure.

As of June, more than 59,000 wild horses were still living in limbo within your holding facilities, with nowhere to go.

An unknown number of others have been sent to brutal slaughter through your touted Adoption Incentive Program, and the changes the BLM recently made to this program still do not ensure that these Congressionally-protected animals won't be killed in violation of your own adoption standards as well as federal mandates.<sup>7</sup>

As such, we again implore the Bureau of Land Management to immediately suspend operations that are needlessly and recklessly killing horses at the Antelope Complex in Nevada, particularly given the ongoing excessive heat wave, and to discontinue all other planned helicopter-assisted roundups.

We would appreciate a response by Monday, July 24 by phone or email at your preference. Sincerely,

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<sup>7</sup> <https://www.nytimes.com/2021/05/15/us/wild-horses-adoptions-slaughter.html>