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Attn: Administrative Review Staff

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Submitted online at [US Forest Service NEPA Project Public Reading Room](#)

Public Participation, Stakeholder Involvement, and Legal Compliance

I hereby submit this formal objection pursuant to my comment submitted on April 11, 2021, regarding the Environmental Assessment. The Forest Service has failed to adequately address or resolve the issues and concerns raised therein, necessitating this objection to the Heber Wild Horse Territory Management Plan and Final Draft EA.

The Final Environmental Assessment (EA) asserts that a collaborative working group, convened by Arizona State University's School of Sustainability from 2017 to 2019, included a diverse range of stakeholders representing wild horse advocates, ranchers, wildlife managers, tribal rangeland managers, veterinarians, and other professionals. According to the EA, the purpose of this group was to facilitate an inclusive dialogue providing expert and community advice to the Forest Service in developing the Heber Wild Horse Territory Management Plan:

“Members of this collaborative working group were selected ... to represent interests related to management of the Heber Wild Horse Territory, including wild horse advocates ... The collaborative working group contributed a range of perspectives and expertise to the initial stages of the Heber Wild Horse Territory Management Plan effort.” (Final EA, p. 8)

Yet, in direct contradiction to this stated commitment, the Forest Service allowed the exclusion of Ms. Mary Hauser, a leading advocate for the Heber wild horses and representative of the Heber Wild Horses Freedom Preservation Alliance, from the collaborative group in 2018. Ms. Hauser was removed by the group facilitator on vague and undocumented grounds of “not being in the spirit of the group,” without meaningful explanation or opportunity to address alleged concerns.

Mary Hauser was removed from the collaborative working group by the ASU facilitator, Michael Schoon, through a voicemail message. I respectfully request that both the record of her termination from the collaborative working group and her subsequent response be included in the administrative record.

As I am unable to attach the original voicemail to this objection, I hereby provide the following transcript of the termination message left by Michael Schoon on the phone of Mary Hauser on September 18, 2018.

“Hi, this is Mike Schoon, it’s Monday morning. Apologies that I missed you once again. Thanks for your email over the weekend. I wanted to let you know we received your comment in the group that you represent on the Agency feedback and working for discussion. Those have been of course forwarded to the Forest Service, cooperating agencies, and the lead to tasking. We wanted to, however, say that it’s our opinion that you have not been working in the spirit of the collaboration, and as such effective immediately, you are no longer a member of the working group. All communications from now on will be stopped from our end. We want to thank you for your time and all the effort you put in and we look forward to meeting again in the future, thanks very much bye”

Below is Mary Hauser’s response, posted as an open letter on the Heber Wild Horses Facebook page, along with the portion of the voicemail from Michael Schoon in which he terminates her, dated September 18, 2018.

<https://www.facebook.com/HeberWildHorses/videos/236190740575827>

The Heber Wild Horse Territory Collaborative Working Group Terminated Me Via Voicemail. My Public Response by Mary Hauser

“The reason I am writing a public response following my termination by the Heber Wild Horse Territory Collaboration Working Group is not to defend myself in the public’s eye. It is because I have seen the inside workings of this group and I am terrified as to what is being planned for the Heber Wild Horse Herd and I think the public has a right to know. In Mike Schoon's voicemail he said, "In our opinion you have not been working in the spirit of the Collaboration." He never said what that "spirit" was, so I'm left to draw my own opinion. My opinion is because I would not conform to what I believe to have been their preset agenda for their ultimate management plan which will decimate the herd and send more than 3/4 of the Heber herd to a fate unknown.

As excited as I was to join the Collaborative Group and represent the Heber Wild Horses and their Territory, I am just as disappointed to see how it was orchestrated and carried out over the last twelve months. Arizona State University along with Southwest Decision Resources was contracted and paid to administrate the working group. The initial problem I had was for a meeting of this magnitude where in attendance we had the Forest Service, BLM, and Arizona Game and Fish officials as well as, cattle grazing permittees, and other interested parties involved and yet no official minutes were ever taken at any of these meetings. I repeatedly asked for minutes to be taken during the first three meetings so that meetings could be reviewed. This would have been a nice paper trail for someone who would have wanted to know who made comments and who is in favor and who is not. There are very important decisions being made during these meetings and people should be held accountable for their decisions. I was told they were not taking minutes because they were not necessary. ASU answers...Someone would take Notes.

Originally I felt my contributions to the group would be to support and protect the herd with my long term observations and studies of the herd, individual workings of the bands, and my knowledge of the forest. However, I realized I was being forced out of my role as a contributor and into the role of a quiet observer of a well orchestrated screenplay of a

management plan for the Heber Wild Horse Territory. I believe this was plan which appeared to have already been devised and laid out prior to the first meeting of the Collaborative Group.

The reason this became so obvious is that members of the Collaborative Group openly admitted to me at the onset of these meetings that they did not have much, if any knowledge of the Sitgreaves National Forest. Many, including some of the Forest Service personnel, had never even been out into the forest until a field trip with this group.

The next startling obvious change occurred when people who had never owned a horse or had very limited to no experience with the Heber Wild Horses were suddenly full of knowledge. Those same people now were full of suggestions about the logistics of gathering, monitoring, tagging, placing tracking collars, and darting birth control. They also took active roles in decisions on how many horses would be left on the land without education or concern of genetics or viable herd numbers.

Their sudden knowledge gave me the impression that they had been hired as actors (without pay) and apparently given scripts to drive the direction of these meetings that were already planned out. The meetings moved swiftly to follow the path of the Bureau of Land Management (BLM) recommendations and the activities that BLM currently engages across our nation.

It also became obvious within the first three meetings that there was no education of the day to day life of the Heber wild horses. When I attempted to educate, defend or make a point in support of the Heber Wild Horses it was ignored. Sometimes I would receive a follow-up phone call from one of the ASU members, Michael Schoon, to 'correct' me and advise me on what I could, should or should not say during the meetings. Meanwhile it appeared others had freedom of speech.

Early on the BLM took the lead of this Collaborative Group even though these horses are not on BLM land. The BLM agent controlled the direction of how things were going to be carried out. The Forest Service employees to this point made very few comments even though they are charged with the management of these horses. Per the Wild and Free-Roaming Horses and Burros Act of 1971 the Forest Service has the responsibility to designate Wild Horse Territories and implement management plans for those Territories. Through the years the Forest Service had failed to devise a plan to manage the Heber Wild Horse Territory, so it's not surprising that they have passed their responsibility off to the BLM which has had years of experience stripping the American West of wild horses.

We have to make it clear that there is nobody left on the working group panel who is truly an advocate for the horses. We know it by their own words...one of the so called advocates suggested "euthanasia" as a way to cull the herd. We know it by their actions...the Forest Service illegally contracted with ranchers in the 1980s and 1990s to capture and remove free-roaming horses without ever having a management plan. Then again in 2005 they announced they were going to remove free-roaming horses until a court injunction prevented them from doing so. We know it by their inaction...a working group member turned her back on the wild horses for approximately three weeks in an area she was assigned by Forest Service to deliver water to during the drought.

Over the course of the meetings their lack of professionalism was displayed as shown here in their final voicemail termination. This came as no surprise because they knew I would NEVER accept their plan to manage the Heber Wild Horse Herd into extinction. To the Forest Service: This is notice to insure that my name is NOT to appear on any documentation connected with the Heber Wild Horse Territory Management Plan.”

This arbitrary termination of Mary Hauser undermines the legitimacy and integrity of the collaborative process, silences a critical stakeholder voice advocating for compliance with the Wild Free-Roaming Horses and Burros Act (WFRHBA), and prevents the full range of perspectives from being meaningfully considered. The exclusion of such a representative frustrates the essential purpose of stakeholder collaboration and violates the procedural mandates of the National Environmental Policy Act (NEPA), which requires meaningful public involvement and consideration of all substantive concerns.

Moreover, the removal conflicts with the WFRHBA’s statutory requirement that wild horses be managed as an integral part of the natural system on public lands, with their protection prioritized over competing uses. Marginalizing the voices advocating for these protections threatens the agency’s legal obligations and diminishes public confidence in the decision-making process.

Given these failures, the Final EA and Management Plan cannot be considered adequate or legally defensible. The Forest Service must withdraw the Plan and conduct a fully transparent, inclusive stakeholder process that restores participation rights to all key advocates, explicitly incorporates dissenting scientific, legal, and community viewpoints, and ensures compliance with both NEPA and the WFRHBA.