



Salt River Horses Collaborative
Final Report prepared by CONCUR, Inc and Keith Mattson, LLC On behalf
of the U.S. Institute for Environmental Conflict Resolution; comments by
Salt River Wild Horse Management Group and American Wild Horse
Campaign
Dec. 13, 2019

The American Wild Horse Campaign (AWHC) and the Salt River Wild Horse Management Group (SRWHMG) together make the following summary comments on the Salt River Collaborative “Near Final Report,” which facilitators have already deemed to be “complete and correct” in advance of receiving participant comments.

As a separate attachment, the SRWHMG has additional comments on specific errors and omissions in the report.

We have participated in good faith in the collaborative meetings facilitated by Concur over the last year and, based on this experience, we unfortunately must strongly reject the entire process as fundamentally flawed, inconsistent with State law, biased against horses and the views of Arizonans, and a waste of time and tax dollars.

Background: The law was designed to protect the Salt River horses in response to a direct threat from the U.S. Forest Service (USFS) to remove these publicly treasured horses entirely, which would have ultimately caused their destruction. That’s the intent of the legislation passed with the overwhelming support of the legislature, the public and Governor Ducey, who said *“Feds should leave our free roaming & #wildhorses alone. But if they don’t, #AZ will do everything we can to protect them & provide sanctuary.”* The Governor further affirmed this intention when he counted it as one of the top accomplishments of his administration for that year as follows: *“Protected our wild horses’ right to roam free without fear of danger or harassment.”*

The collaborative process, as outlined in the documents provided, was needlessly complicated, time-consuming and, demonstrated a clear bias against the very thing the law is designed to protect – the Salt River horses.

While Concur purports to be an independent, third-party neutral collaboration facilitator, the process and management of the collaborative made clear that there was

an obvious bias. The process appeared to be designed to achieve two primary objectives: to massively reduce population and territory of the Salt River horses.

The Collaborative did not solve any management issues. Instead, it provided a vehicle for unelected, unaccountable third parties (who were not supportive of the legislation to start) to undermine the legislation and its intent to protect the horses.

We first noted the “structural and procedural” flaws in the Collaborative process on Dec. 6, 2018 in our detailed comments on Ground Rules, Operating Protocols and an extremely biased “situational assessment.” Our comments and concerns were largely ignored and remained present throughout the entire process.

Following are some of those comments:

- Failure by the convening agency to convene a true stakeholder group. Final report states that recreational and business interest were present, yet they were not. Local businesses that benefit from Salt River horse tourism and recreational users (tubers, kayakers, wildlife viewers) who value the presence of the horses were not included in the process while clear anti-wild horse interests (livestock, hunting and a small but vocal segment of the conservation community) were over-represented, both in number and through consistent preferential treatment by moderators.
- Failure by the convening agency to place proper emphasis and priority on upholding the intent of state law to *protect* the Salt River horse *in their historic habitat along the lower Salt River. Most participants were not there to refine protections for the Salt River wild horses, but instead mount opposition to their very existence there.*
- Failure by the convening agency to considering actual management issues and consistent minimizing of the management experience and data collected on the Salt River horse population by the SRWHMG.

Notably the report also omits *any* discussion that took place of the river boundary fence, an issue that will have a profound effect on the Salt River horses. That fence will have great unintended consequences on the horses and their management. Concerning to us is that this Forest Service decision uses an inadequate categorical exclusion in order to circumvent public input and disclosure. Taking off the table one of the most important management issues is not evidence of good faith and a truly collaborative process.

As we have explained, the fence along the edge of 4 miles of lower Salt River has the potential to put the Salt River horses at great risk by denying them access to critical habitat including forage and water. Our suggestions to mitigate this impact included moving the boundary fence slightly in a manner that would still protect public safety

but allow sufficient space for horse care and management. Those suggestions were never seriously considered.

The few things that could actually improve management and safety were only given cursory treatment in the Collaborative. These include:

1. Defining harassment, establishing a 50 foot viewing rule and imposing a penalty for harassment;
2. Allowing the placement of education and safety signs by SRWHMG at no cost to the government;
3. Authorizing a pond and/or water source to be created in the valley behind the SRWHMG facility to enable horses to access water sources away from the busiest areas along the river;
4. Enforcement of the EXISTING Maricopa County Leash Law; and
5. Minimizing conflicts in the area with the largest concentration area of salt river wild horses by disallowing horseback riding in the small 400 acre area accessed by the trailer parking lot on Coon Bluff Road.

The final report of the collaborative implies broad support for a proposal that would decimate the current Salt River herd by removing almost 80% of the horses. This is not a proposal that will be supported by the Arizona public nor is it consistent with the intent of the State law that protects these horses. In fact, a plan to drastically reduce the Salt River horse population will be viewed as a great betrayal of the public trust.

The Salt River Wild Horse Management Group works hard to provide a service to the government to balance all interests. It raises funds to address each and every situation that arises with the Salt River horses, as well as to reduce their population humanely through a robust fertility control program. This takes an extensive, coordinated effort and many citizens willingly and generously donating their time to protect and humanely manage the horses.

It is disappointing that this collaborative, which is reported to have cost taxpayers as much as \$1 million, did not establish a balanced stakeholder process and failed to deliver impartial facilitation. The results of the final report reflect this deeply flawed process and its fundamental deficiencies.

The SRWHMG, with support from AWHC, remains committed to working together with the AZDA and the Forest Service on the successful long-term humane management of the Salt River horses within the Tonto National Forest in consistent with state law and the expectations of the public.
