

Theodore Roosevelt National Park

North Dakota

National Park Service
U.S. Department of the Interior



CIVIC ENGAGEMENT COMMENT ANALYSIS REPORT

**Theodore Roosevelt National Park
Livestock Management Plan**

July 2022



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ACRONYMS AND ABBREVIATIONS

Full Phrase

BLM	Bureau of Land Management
EA	environmental assessment
EPA	Environmental Protection Agency
LMP	livestock management plan
NEPA	National Environmental Policy Act
NPS	National Park Service
the Park	Theodore Roosevelt National Park
PEPC	planning, environment, and public comment

CHAPTER 1

INTRODUCTION AND GUIDE

The United States Department of the Interior, National Park Service (NPS) is proposing to develop a livestock management plan (LMP) for Theodore Roosevelt National Park (the Park). This report documents the results of the initial civic engagement process in support of the National Environmental Policy Act (NEPA) document. Civic engagement is a collaborative public involvement process conducted prior to the initiation of the NEPA process to identify and refine issues to address in the NEPA document, in this case an environmental assessment (EA). Public involvement is a vital part of the NEPA process. In addition to the civic engagement process, public involvement for this project will include a scoping period, public review of the draft EA, and collaboration with federal, state, and local governments and interested Tribes.

1.1 CIVIC ENGAGEMENT PROCESS SUMMARY

On March 16, 2022, the NPS published a civic engagement newsletter and initiated the start of a 30-day public comment period. The newsletter included a description of the project background, the purpose and goals for the project, and preliminary draft alternatives. On March 30, 2022, the NPS held a virtual civic engagement meeting to present information on the proposed project and answer questions posed by the public. The NPS invited members of the public to submit comments on this draft proposal electronically through the NPS planning, environment, and public comment (PEPC) website. The comment period was ultimately extended from April 15, 2022, to April 18, 2022, due to a severe weather outbreak, resulting in widespread power outages. The comment period was extended to accommodate those who may not have been able to submit a comment due to loss of power.

1.2 NATURE OF COMMENTS RECEIVED

The NPS received 1,774 pieces of correspondence during the civic engagement period. Of the 1,774 correspondence, 1,242 correspondence letters were unique, and 533 were part of 4 separate form-letter campaigns¹. The topics that received the majority of the comments related to the

¹ Form-letter campaigns use a standardized correspondence letter which is generally initiated by non-government advocacy groups. Form letters are those with identical or nearly identical text. For the purposes of this report, a master form letter was identified by NPS analysts and reviewed for any substantive comments. Correspondence identical to the master form letter were not analyzed.

management of feral horses within the Park, while fewer comments related to the management of cattle and bison.

1.3 THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by decision-makers and the NEPA team. Comment analysis assists the team in organizing, clarifying, and addressing technical information regarding the LMP. It also aids in identifying the topics and issues to be evaluated and considered in the EA.

The comment analysis process includes five main components:

- Developing a coding structure
- Employing a comment database for comment management
- Reading and coding public comments
- Interpreting and analyzing the comments to identify issues and themes
- Preparing a comment report summary

The NPS developed a coding structure to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS review, past planning documents, and the comments themselves. The structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS used its PEPC database to manage the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

The analysis of the public comments involved assigning codes to statements made by the public in their submitted letters. The NPS read and analyzed all comments, including those of a technical nature; those expressing opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report is just one part of the process of gathering internal and external input. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the comment's content rather than the number of times a comment was received. This report is intended to be a summary of the comments received rather than a statistical analysis.

1.4 DEFINITION OF TERMS

Primary terms used in this document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter or fax, written comment form, or a comment submitted online using the

NPS PEPC website. Each piece of correspondence is assigned a unique identification number in the PEPC system.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It should include information such as an expression of support or opposition to the use of a potential management tool with rationale, or additional data regarding an existing condition.

Code: A code is the grouping centered on a common subject. The NPS developed the codes during the civic engagement process and uses the codes to track major subjects throughout the EA process.

Concern: A concern is a written summary of all comments received under a particular code. Some codes were further separated into several concern statements to provide a better focus on the content of the comments.

1.5 METHODOLOGY

During the civic engagement process, 1,774 unique correspondence pieces were received from the PEPC website directly, or they were entered into the PEPC database for analysis. Submissions that were duplicative or greater than 95 percent identical were analyzed as one unique submission. The NPS read each correspondence and identified specific comments within each correspondence. A total of 1,566 comments were derived from the correspondences received.

The NPS gave each comment a code to identify the comment's general content and to group similar comments together. Twenty-one codes were used to categorize all the comments received. An example of a code developed for this project is *Preliminary Alternative A – No Action*. This code relates to any comments received regarding the no action alternative. In some cases, the same comment may have overlapping issues within the same statement; in this case a single comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea. All comments were read and considered, and relevant comments will be used to help refine the proposed alternatives, which will ultimately be analyzed in the EA.

Under each code, the NPS grouped comments by similar themes, and those groups were summarized with a concern statement. For example, one concern statement identified—“Removing livestock is needed to protect natural resources in the Park.”—captured several comments. Following each concern statement are one or more representative quotes, which are comments taken from the correspondences to illustrate the issue, concern, or idea expressed by the comments grouped under that concern statement.

1.6 GUIDE TO THIS DOCUMENT

This remainder of this report is organized as follows:

Chapter 2, Content Analysis Report: This is the basic report produced from the PEPC database that provides information on the numbers and types of comments received, organized by code. The report's first section provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states

where commenters live, and the number of letters received from different categories of organizations.

Chapter 3, Civic Engagement Summary: This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments and have not been edited. Spelling and grammar errors were not corrected. Representative quotes further clarify the concern statements.

CHAPTER 2

CORRESPONDENCE SUMMARY

The following tables show the distribution of correspondences by how they were coded.

Table 2-1
Comment Distribution by Code

Code Description	Number of Comments ¹
Preliminary Alternative A: No Action	15
Preliminary Alternative B: Reduction of Herd Over Time to No Livestock	5
Preliminary Alternative C: Non-Reproductive Herds at South Unit and North Unit	9
Preliminary Alternative D: Non-Reproductive Herds at South Unit and Elkhorn Unit	4
Preliminary Alternative E: Reproductive Herds of Horses and Cattle	52
Preliminary Alternative F: Non-Reproductive Herd of Horses and Removal of Cattle	3
New Alternative Proposed	42
Issues: Cultural resources	93
Issues: Park management	196
Issues: Visitor use or experience	147
Issues: Livestock, Horses	613
Issues: Livestock, Cattle	47
Purpose And Need: Planning Process And Policy	15
Purpose And Need: Park Purpose And Significance	75
Purpose And Need: NEPA And CEQ	27
Purpose and Need: Interpretation of Park Policies, Regulations, Laws	88
References: General Comments	34
Issues: Socioeconomics	42
Issues: Vegetation	14
Issues: Wildlife / Special Status Species	42
Issues: Water Resources	3

Code Description	Number of Comments ¹	
	Total	1,566

¹ Note: Each correspondence may have multiple substantive comments. As a result, the total number of correspondences may be different from the actual comment totals.

**Table 2-2
Correspondence by Organization Type**

Organization Type	Number of Correspondences
State Government	1
Non-Governmental	2
Unaffiliated individual ¹	1,771
Total	

¹Several unaffiliated individuals identified non-government organizations with which they are associated. These organizations are listed in **Table 2-3**.

**Table 2-3
Organizations Represented in Correspondences**

Organization Name	Organization Type
Advocates for Wild Equines	Nongovernmental
American Wild Horse Campaign	Nongovernmental
Cat Ranch Sanctuary, Inc.	Nongovernmental
Dakota Grown Photos	Nongovernmental
High Country Homes RE, Inc.	Nongovernmental
Kinona	Nongovernmental
Marian's Dream and United Spay Alliance	Nongovernmental
North Dakota Senate	State Government
North Dakota Badlands Horse	Nongovernmental
North Dakota Stockmen's Association	Nongovernmental
The Cloud Foundation	Nongovernmental
Topeka Independent Business Assoc.	Nongovernmental
Western Watersheds Project	Nongovernmental
Wild At Heart	Nongovernmental
Wild Heart Sanctuary	Nongovernmental
Wild In North Dakota	Nongovernmental
Wild Lands, Wild Horses	Nongovernmental
Save Our Wild Horses	Nongovernmental

Table 2-4
Correspondence Distribution by Correspondence Type

Correspondence Type	Number of Correspondences*
Web form**	1,764
Letter	10
Total	

*Some entities sent correspondence in multiple formats (in other words, one commenter sent the same letter multiple ways); this table does not include duplicate letters.

**Filled out form on the PEPC database

Table 2-5
Correspondence Distribution by State

State	Number of Correspondence	Percent of Correspondence
Alaska	5	0.3%
Alabama	12	0.7%
Arkansas	10	0.6%
Arizona	62	3.5%
California	181	10.2%
Colorado	84	4.7%
Connecticut	18	1.0%
District of Columbia	1	0.1%
Delaware	5	0.3%
Florida	98	5.5%
Georgia	21	1.2%
Hawaii	1	0.1%
Iowa	20	1.1%
Idaho	7	0.4%
Illinois	78	4.4%
Indiana	31	1.7%
Kansas	9	0.5%
Kentucky	17	1.0%
Louisiana	9	0.5%
Massachusetts	33	1.9%
Maryland	16	0.9%
Maine	15	0.8%
Michigan	44	2.5%
Minnesota	67	3.8%
Missouri	28	1.6%
Mississippi	3	0.2%
Montana	18	1.0%
North Carolina	35	2.0%

State	Number of Correspondence	Percent of Correspondence
North Dakota	136	7.7%
Nebraska	5	0.3%
New Hampshire	15	0.8%
New Jersey	35	2.0%
New Mexico	17	1.0%
Nevada	34	1.9%
New York	93	5.2%
Ohio	69	3.9%
Oklahoma	8	0.5%
Oregon	28	1.6%
Pennsylvania	57	3.2%
Rhode Island	5	0.3%
South Carolina	13	0.7%
South Dakota	9	0.5%
Tennessee	21	1.2%
Texas	65	3.7%
International	58	3.3%
Utah	13	0.7%
Virginia	28	1.6%
Vermont	6	0.3%
Washington	66	3.7%
Wisconsin	49	2.8%
West Virginia	7	0.4%
Wyoming	9	0.5%
Total	1,774	100%

CHAPTER 3

CIVIC ENGAGEMENT SUMMARY

This chapter presents the concern statements identified through the civic engagement process, illustrated by representative quotes submitted during the comment period for each concern statement. Representative quotes are presented as received and have not been edited for errors.

The representative quotes following each concern statement include correspondence from members of organizations who may not be an official representative of the organization or agency; therefore, comments may not represent the views or opinion of the identified organization or agency.

3.1 PRELIMINARY ALTERNATIVE A: NO ACTION

CONCERN STATEMENT 1: Commentors had the following concerns about current management of horses and cattle in the Park:

- *It is guided by an outdated environmental assessment*
- *It lacks the use of scientific or genetic information in management of the horse herd*
- *It does not adequately mitigate the impacts of nonnative species in the Park*

Representative Quote(s):

Organization Type: Non-governmental; **Organization:** Western Watersheds Project; **Affiliation:** Official Representative

Representative Quote: “The No Action Alternative does not adequately mitigate the impacts of non-native species in the Park. This would require a continued high level of management activity to be focused on maintaining these herds and the infrastructure to maintain and support them. The NPS should ensure that the NEPA analysis considers the amount of time, money, and other resources that go into managing the cattle and horse herds.”

Organization Type: Non-governmental; **Organization:** Chasing Horses Wild Horse Advocates; **Affiliation:** Member

Representative Quote: “As the Park itself has acknowledged, the status quo is no longer tenable. The Park's current management regime, which is ostensibly guided by an outdated

environmental assessment “EA” and implemented on an ad hoc basis, has left this herd with primarily an older herd with little to no younger horses to replace those that will die over the next 5-10 years. The current management regime lacks the use of any science or genetic information in its management of this herd. This is evident from the Park's singular focus on achieving an arbitrary herd size, without any regard for the herd's phenotypic expression or the types of individual horses that makeup that herd.”

3.2 PRELIMINARY ALTERNATIVE B: REDUCTION OF HERD OVER TIME TO NO LIVESTOCK

CONCERN STATEMENT 1: *Removing livestock is needed to protect natural resources in the Park.*

Representative Quote(s):

Organization Type: Non-governmental; **Organization:** Western Watersheds Project; **Affiliation:** Member

Representative Quote: “Draft Alternative B provides the greatest opportunity for natural resource protection by removing the resource intensive non-native species from the Park over time..”

CONCERN STATEMENT 2: *Eliminating the horse herd or managing for a nonreproductive herd would be inconsistent with the landscape that existed when Theodore Roosevelt was in North Dakota and the purpose for which the Park was designated.*

Representative Quote(s):

Organization Type: Non-governmental; **Organization:** Chasing Horses Wild Horse Advocates; **Affiliation:** Member

Representative Quote: “Complete elimination of the herd is also practically unwise for other reasons. The state of North Dakota is rich in equine history. It is well documented that wild horses existed during the time that Theodore Roosevelt spent in our state. In 1989, Castle McLaughlin completed her extensive research that was published in her document: “The History and Status of the Wild Horses of Theodore Roosevelt National Park”. We have included a copy of this document for your reference during this management planning process.”

3.3 PRELIMINARY ALTERNATIVE C: NON-REPRODUCTIVE HERDS AT SOUTH UNIT AND NORTH UNIT

CONCERN STATEMENT 1: *Maintaining cattle in a fenced area of the North Unit strikes a balance between visitor appreciation, historic significance, safety of the bison herd, and keeping the cattle herd size at current recommended levels.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “Of the draft alternatives suggested for cattle, that of Alternative C with a small non-reproductive herd being placed in a fenced pasture in the North Unit adjacent to the Loop Road and the Buckhorn Trail strikes the best balance between visitor appreciation, historic significance, safety of the bison herd, and keeping the herd size at current recommended levels.”

CONCERN STATEMENT 2: *Managing for a nonreproductive horse herd would increase the management burden.*

Representative Quote(s):

Organization Type: Non-governmental; **Organization:** Western Watersheds Project; **Affiliation:** Member

Representative Quote: “While allowing only non-reproductive populations to live in the Park allows NPS employees to better regulate the number of individuals in the Park, it also increases the amount of management effort associated with implementing contraception in the horse herd.

3.4 PRELIMINARY ALTERNATIVE D: NON-REPRODUCTIVE HERDS AT SOUTH UNIT AND ELKHORN UNIT

CONCERN STATEMENT 1: *Moving cattle to the Elkhorn Ranch Unit would be expensive, would result in fewer visitors seeing cattle, and would introduce the impacts of livestock into an area that has not experienced these impacts since before the Park was created.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “Moving them to Elkhorn and monitoring them there to make sure they were healthy, had adequate water, etc. would be very expensive and few visitors would see them.”

Organization Type: Non-governmental; **Organization:** Western Watersheds Project; **Affiliation:** Member

Representative Quote: “This alternative contains many of the challenges that must be explored in Draft Alternative C. However, this would reduce the chances that cattle will transmit diseases to Park bison. Instead, this would introduce the impacts of livestock into an area that has not experienced these impacts since before the Park was created. These impacts must be adequately assessed in the NEPA analysis.”

3.5 PRELIMINARY ALTERNATIVE E: REPRODUCTIVE HERDS OF HORSES AND CATTLE

CONCERN STATEMENT 1: *Managing a reproductive herd of horses would improve their genetic health but not at the proposed population objective.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “I support the plan E which would be a reproductive herd with numbers controlled by chemical immobilization of young horses, natural attrition of older horse, and use of Gonocon for birth control. I support bringing in new blood to make sure they are not closely related to the current Park horses.

I do not agree with the 30 to 60 head of horses. I think this is too few for guests to see as they ride, hike or drive thru the park. If my records are correct the number of horses in the park has been more than 85 since 2009. Since 2015 the goal was to keep the numbers below 145 by captures and attrition. Since the horse numbers at that level and the Bison numbers also at

record levels during that time did not seem to be detrimental, I propose the numbers be 75 to 100.”

CONCERN STATEMENT 2: Management of horses that are not suitable for adoption after the management capacity is reached is not clearly defined.

Representative Quote(s):

Organization Type: Non-governmental; **Organization:** Wild in North Dakota; **Affiliation:** Member

Representative Quote: “Our first concern with Option E is what will happen with the current herd which will number well over 200 horses by the time this plan is in place? Will older horses be removed or allowed to live out their lives in the park? Older horses are much more difficult to tame and train and are not good candidates for a successful transition into the domestic world.”

CONCERN STATEMENT 3: Managing for reproductive horses and cattle would increase the management burden for the Park.

Representative Quote(s):

Organization Type: Non-governmental; **Organization:** Western Watersheds Project; **Affiliation:** Member

Representative Quote: “This alternative is contrary to the objectives of developing a new Livestock Management Plan. This is the only alternative that would increase the number of both cows and horses in the Park. This would create a need for more infrastructure and more supplemental feeding of both populations. With both populations existing as breeding populations, management to keep the herds small while maintaining appropriate genetics will also increase the demands for management.”

3.6 NEW ALTERNATIVE PROPOSED

CONCERN STATEMENT 1: NPS should evaluate an alternative that includes both a reproductive and a nonreproductive horse herd.

Representative Quote(s):

Unaffiliated individual

Representative Quote: “I also think a combination of sorts of plan E with plan C would not hurt- a herd of geldings for the public to see, who can't necessarily hike or walk to see the horses, would be a benefit to both park visitors and the park itself.”

Unaffiliated individual

Representative Quote: “In my opinion the ideal future management of wild horses in your park would include a combination of “Option C” and “Option E”

This would entail maintaining a herd of non-reproducing horses (geldings) in a readily accessible area of the park, so that park visitors can experience seeing wild horses without participating in a strenuous expedition into remote areas (Option C), AND introducing new blood into the existing reproductive herd via wild horses rounded up from other locations

and carefully chosen for characteristics that will enhance gene pool of the reproductive herd, and allowing the reproductive herd free range of the entire park (Option E).”

CONCERN STATEMENT 2: *NPS should evaluate an alternative that looks at the immediate removal of longhorns and horses from the Park.*

Representative Quote(s):

Organization Type: Non-governmental; **Organization:** Western Watersheds Project; **Affiliation:** Member

Representative Quote: “The NPS should also consider what it would look like to immediately remove cattle and horses from the park through capture and sale rather than letting them live out their lives in the Park.”

3.7 PURPOSE AND NEED: PARK PURPOSE AND SIGNIFICANCE

CONCERN STATEMENT 1: *Because horses were a part of Theodore Roosevelt’s experience during his time in and around what is now Theodore Roosevelt National Park, managing wild horses is part of the Park’s purpose and significance. Reproductive horses and cattle would also have been seen at large by Theodore Roosevelt and ultimately led to his awe and appreciation for the natural world and subsequent creation of the National Park System.*

Representative Quote(s):

Organization Type: Non-Governmental; **Organization:** Chasing Horses Wild Horse Advocates; **Affiliation:** Member

Representative Quote: “Additionally, it is often argued that the wild horses of Theodore Roosevelt National Park are NOT native to this landscape. Documents such as Castle McLaughlin’s as well as Theodore Roosevelt’s own writings prove that the wild horses were part of what is now Theodore Roosevelt National Park long before it was fenced.”

Unaffiliated individual

Representative Quote: “The horses are part of the Pres Roosevelt’s NP vision and should be protected as such. His wonder of the natural world would have led him to experience the natural behaviour of the horses there, this is wild horse ethology and is a science in itself.”

Unaffiliated individual

Representative Quote: “In keeping with President Teddy Roosevelt’s appreciation of the natural world and the inspiration for his creation of several new national parks, TRNP should make the preservation of wild horses a cornerstone of the Park’s livestock management plan.

These horses must be managed to preserve natural behaviors such as stallions protecting their families, foals with their mothers, and the whole array of natural wild horse behaviors. These are the very things that Teddy Roosevelt would have experienced and that would have served as an inspiration for him.”

Organization Type: Non-Governmental; **Organization:** The Cloud Foundation; **Affiliation:** Member

Representative Quote: “Continue to manage the horses as a reproducing herd as Teddy Roosevelt would have experienced - this is critical to preserving the historic and cultural resource and the desired visitor experience.”

CONCERN STATEMENT 2: Management of wild horses does not coincide with the focus and purpose of the National Park System per the Organic Act of 1916. Preservation of native species and their communities should be the primary focus of the Park.

Representative Quote(s):
Unaffiliated individual

Representative Quote: “Requiring a National Park unit, charged with the preservation of native plants and animals, to transform its landscape into a horse breeding facility is not consistent with the Parks enabling legislation nor the NPS Organic Act. Through these foundation documents, native species and their communities must remain the focus of TRNP.”

3.8 PURPOSE AND NEED: PLANNING PROCESS AND POLICY

CONCERN STATEMENT 1: The Park should develop separate plans for horses and longhorn steer.

Representative Quote(s):
Organization Type: Non-Governmental; **Organization:** Chasing Horses Wild Horse Advocates; **Affiliation:** Member

Representative Quote: “The wild horses should have their own proper wild horse management plan, as has been promised to the tax paying public since 1978.”

Unaffiliated individual

Representative Quote: “I believe that there should be a separate wild horse management plan, more importantly the park should clarify how the horses got this distinction.”

3.9 PURPOSE AND NEED: NEPA AND CEQ

CONCERN STATEMENT 1: An Environmental Impact Statement should be prepared due to the controversial nature of the project for the following reasons:

- *There are disputes as to the size, nature, or effect of the proposed actions*
- *There is scientific controversy surrounding horse herd*
- *There are social and economic effects of proposed actions*
- *There is potential for significant impacts*

Representative Quote(s):
Organization Type: Non-Governmental; **Organization:** American Wild Horse Campaign; **Affiliation:** Member

Representative Quote: “First, as to "context" the NPS must prepare an EIS due to the breadth and scope of the project. The LMP will impact the TR horses with a plan that is unproven to actually accomplish the NPS proposed goals to provide a long-range management plan that considers the role of horses as historic exhibits; define best

management practices for horses while reducing impacts on natural resources; balance horse management with natural and cultural resources; and address public interest related to wild horse management in the TRNP. (TRNP March 2022 Newsletter) The NPS's decision to prepare an EA here, in lieu of an EIS, would be contrary to the NEPA and its implementing regulations.”

Organization Type: Non-Governmental; **Organization:** Chasing Horses Wild Horse Advocates; **Affiliation:** Member

Representative Quote: “Further, CHWHA notes that an EA is an inappropriate vehicle for assessing the significant impacts that this management plan will have on the environment. As the Park is well aware, this proposed "livestock" management plan entails long-term management of horses that are historically important to the Park, unique to North Dakota's Badlands, and have long been a controversial subject. As such, an Environmental Impact Statement is necessary to take the requisite "hard look" at the environmental effects of the Park's proposed plan.”

3.10 PURPOSE AND NEED: INTERPRETATION OF PARK POLICIES, REGULATIONS, LAWS

CONCERN STATEMENT 1: *Wild horses should be recognized as native wildlife, not livestock, for the following reasons:*

- *Horses do not meet the definition of livestock because they are not domesticated animals raised in an agricultural setting for economic profit.*
- *The Park has never provided water, feed, or shelter to the horses as it does for the longhorn cattle.*
- *Classifying horses as livestock deprives them of certain important protections afforded to wildlife.*
- *Assateague Island National Seashore has classified their wild horses as wildlife and NPS should explain why it classifies the same resource differently.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “For accuracy in moving forward to humane and wise management of these valuable Wild horses, they must be officially classified correctly as Native Species. These wild horses have never been cared for as livestock. They do not receive food, water, shelter or medical care as livestock would receive. Wild horses fend for themselves alongside the bison, elk, deer and other wildlife. They do not require or desire interaction from man. Additionally, according to American Wild Horse Campaign, paleontological evidence and mitochondrial DNA analysis support the fact that wild horses are a reintroduced native species to this continent.”

Unaffiliated individual

Representative Quote: “This wild horse herd roams freely and cares for itself so should therefore be designated as wildlife, not livestock. Livestock are raised for use on a farm and they are clearly being housed for farming purposes.”

CONCERN STATEMENT 2: *The horses should be managed in accordance with the Wild and Free-Roaming Horses and Burros Act of 1971 (WFRHBA).*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “Our wild horses should remain wild on the range. We the people want the 1970's wild horse and burro act is not being honored removing most of the wild horses.

Unaffiliated individual

Representative Quote: These wild horses need to be protected in accordance with the wild horse and burro act of 1971. Has the park service done any kind of accurate study of the herds and their affect on the park itself?

3.11 ISSUES: PARK MANAGEMENT ISSUES

CONCERN STATEMENT 1: *The Park should stop any further roundups completely, or until an EA has been completed.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “While the National Park Service (NPS) is preparing the LMP, I believe any roundups must be halted.”

CONCERN STATEMENT 2: *The Park must disclose the costs and the trade-offs of rounding up and selling horses versus administering different types of contraceptives as a means to control herd size. The Park should increase the overall budget for horse management.*

Representative Quote(s):

Organization Type: Non-Governmental; **Organization:** Wild Lands, Wild Horses; **Affiliation:** Member

Representative Quote: “Increase the TRNP budget to account for new genetic introductions, captures to meet the genetic diversity goals, ongoing herd management, and additional staff necessary to maintain a viable Resource Management Plan in all other areas of park management. This available funding is part of the Great American Outdoors Act passed on July 22, 2020, where one of the goals is to "put more Americans to work in the National Park System and help sustain local communities across the country that are dependent on park and recreation tourism". This meets the goal of having enough resources to adequately manage the park to all species and needs.”

Organization Type: Non-Governmental; **Organization:** American Wild Horse Campaign; **Affiliation:** Member

Representative Quote: “A detailed economic analysis of all proposed alternatives, including disclosure of all costs associated with the roundups versus the costs of implementing a fertility control program with forage allocation adjustments that would enable the TR horses to remain and be maintained in the Park without costly removals.”

Unaffiliated individual

Representative Quote: “Instead of removing the wild horses from the park, Doing a PZP fertility darting program would be a monumental step towards managing wild horse herds in the parks. This is relatively cheaper than roundups, which break up families and cause harm and death to many of the horses.”

CONCERN STATEMENT 3: Park officials should coordinate with other outside experts and horse advocacy groups for suggestions regarding management of the horses. The Park should disclose a list of those parties consulted regarding horse management. The Park should model their horse management similar to other National Parks that have horses, such as Assateague Island and Cape Lookout National Parks.

Representative Quote(s):

Unaffiliated individual

Representative Quote: “I recommend the wild horse experts with an intimate knowledge of the band territories - Wild in North Dakota and Chasing Horses - help design this area for non-reproducing horses and determine which horses are placed in this area. This could be an ideal area for horses too old to adopt out to live out their lives in the home they were born to.”

Organization Type: Non-Governmental; **Organization:** American Wild Horse Campaign; **Affiliation:** Member

Representative Quote: “All data and methods that the NPS relies on to support the establishment and continued management of the number of wild horses it determines can remain in the TRNP. The EA must fully disclose a list of groups and individuals consulted in setting this number of remaining horses.”

Unaffiliated individual

Representative Quote: “I suggest it is vital to have an equine expert who highly values this unique group of wild horses to advise on creating this management plan AND to implement it going forward. The task of this expert would include advising on all decisions concerning:

Maintaining current lineages, adding new lineages, determining when PZP is used and with which mares, maintaining the herd large enough to have a healthy breeding population, selecting which horses would be enclosed in the tourist viewing area, respect the family band units, etc.”

Unaffiliated individual

Representative Quote: “Given the complex issues re wild horses in TRNP, I recommend bringing in a highly regarded, scientific and neutral non-profit organization (Conservation Planning Specialist Group/SSC/IUCN) which has helped develop management plans for the US government for complex species cases such as New England coy-wolf, bison, desert pupfish, Puerto Rican parrot, Black-footed ferret, California condor, etc. They have small population management expertise combined with unusual knowledge-based facilitation skills, and have 40 years organizational experience.”

Organization Type: Non-Governmental; **Organization:** The Cloud Foundation;
Affiliation: Member

Representative Quote: “In a detailed report evaluating the Bureau of Land Management's wild horse management program, the National Academy of Sciences ("NAS") actually praised the management of the wild horses in two other national parks: Assateague Island and Cape Lookout National Seashore. Given the success of the Assateague Island and Cape Lookout plans, we believe those plans should serve as a model for the management of wild horses that call Theodore Roosevelt National Park home.

Part of the NAS's praise is below. This is pertinent because they are BOTH also managed by the National Park Service and show that similar plans ARE possible for the wild horses of Theodore Roosevelt National Park.”

CONCERN STATEMENT 4: Current Park policy under the GSA adoption program leaves horses susceptible to slaughter.

Representative Quote(s):
Unaffiliated individual

Representative Quote: “Reducing the herd (option 4) to 75 or less, which doesn't meet the minimal standards for a genetically viable herd, is harmful and unscientific. Treating the mares with Gonacon - - which will sterilize them in the long run and destroy wild behaviors - - is wrong. And putting captive mares up for auction on a government site with no plans to insure the buyers will not put them into the slaughter pipeline for profit is a horrible abuse.”

3.12 ISSUES: LIVESTOCK, HORSES

CONCERN STATEMENT 1: The effect(s) of contraceptives on horse health and behavior is a concern. The Park should use PZP contraceptive instead of GonaCon due to concerns regarding short-term and long-term physiological impacts, such as site of injection injury or sterilization.

Representative Quote(s):

Organization Type: Non-Governmental; **Organization:** The Cloud Foundation;
Affiliation: Member

Representative Quote: “The EA must consider and should adopt fully implementing a humane PZP fertility control program as an alternative to the removal of horses. The EA should include the ability to partner with bonafide wild horse advocacy organization, such as The Cloud Foundation, to implement a humane PZP fertility control program.”

Organization Type: Non-Governmental; **Organization:** American Wild Horse Campaign;
Affiliation: Member

Representative Quote: “In short, because published research on GonaCon in horses is limited, there are remaining questions regarding negative impacts to pregnant mares (including association with abortion when given in early stages of pregnancy), long-term physiological effects, and whether the vaccine is a permanent sterilitant or reversible. Even the short-term social/behavioral effects are not yet established. Thus, this experimental fertility control drug is not appropriate for field use and the NPS should remove it from use in the TRNP.”

Unaffiliated individual

Representative Quote: “Please use contraceptive on most mares, but allow some foals to be born and remain every year for a more natural band representation and behavior, and for band maintenance.”

Organization Type: Non-Governmental; **Organization:** AWE Coalition; **Affiliation:** Member

Representative Quote: “This herd should never again be exposed to GonaCon or IUD's. There have been more than enough experiments done by CSU which is affecting the herd's safety. PZP should be recorded when administered, two consecutive doses with a year in between the next dosage. These horses should not be exposed to medications that sterilize them for life. Stallions can smell a mare that is sterilized and they will be run off from the herd. The herd genetics are skewed by preventing certain mares from giving birth. NO spaying, NO Gonacon should be used in this herd. Studies have shown that PZP has changed the foaling cycles in prolonged usage.”

Unaffiliated individual

Representative Quote: “Let the herd be large enough to reduce any future inbreeding and use PZP as a birth control method to prevent unregulated expansion. This is done in Nevada with the Pine Nut horses and is extremely successful with advocacy groups working with the BLM and volunteers administering the PZP and retrieving their darts annually. Look to the success of this herd management.”

Unaffiliated individual

Representative Quote: “Instead of using GonaCon, it must also implement a fertility control program with PZP that has a 35-year history of being reversible and safe even for pregnant mares.”

CONCERN STATEMENT 2: *The Park should manage for the genetics of the horse herd for the following reasons:*

- *To manage the appropriate herd number to prevent inbreeding and genetic drift*
- *To maintain a diversity of horse coat color, patterns, and markings within the Park's horse herd*
- *To determine horses that contain the lethal-white syndrome gene and remove those horses from the breeding population*
- *To consider hoof health and stability*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “A 2018 study from Texas A&M found that this historic herd is at risk of inbreeding and recommended introducing new mares and changing removal strategies to preserve genetics and lineages. A minimum population of 150 or more must be maintained by allowing the horses to use additional areas of the park.”

Unaffiliated individual

Representative Quote: “Lethal white syndrome could be eliminated if a mare and stallion are known to carry this gene. I recognize the need to use fertility control to maintain the healthy reproductive size of this herd. It needs to be used in conjunction with preserving the vital lineages as discussed while helping the health of individual mares.”

Unaffiliated individual

Representative Quote: “In fact, equine geneticist Gus Cothran, states that wild horse numbers must never be reduced to levels below the minimal population level of 150-200 effective adult breeders of standard reproductive age (not counting foals, yearlings, or bachelors) that is necessary for long-term genetic viability and the preservation of healthy, self-sustaining wild horse populations”

Organization Type: Non-Governmental; **Organization:** The Cloud Foundation;
Affiliation: Member

Representative Quote: “Based on the popularity of the TRNP horse herd, we urge the Park Service to expand the areas for horse usage to accommodate the minimum population of 150 to 200 horses. Increasing the area where horses are allowed to live would enable the Park Service to increase the population and establish a sustainable and genetically viable long-term population number.”

Unaffiliated individual

Representative Quote: “Several of the proposals speak of bringing in outside animals to expand the genetic pool. Caution should be taken to prevent the loss of the historical lineage of the horses. Past attempts at the same outcome have failed. These efforts are both stressful to the TPR horses and the horses which are introduced. This option is not as simple as it sounds and can result in significant adverse outcomes.”

Unaffiliated individual

Representative Quote: “None of us want to see the effects of inbreeding in the wild horses become more and more evident. Therefore I agree with the removal of a portion of the herd and replacing it with genetically diverse stock from BLM gathers to protect TRNP for the unique experience it is.”

Organization Type: Non-Governmental; **Organization:** North Dakota Badlands Horse;
Affiliation: Member

Representative Quote: “Responsible animal husbandry would require that animals to be treated with birth control and those to be removed would be chosen with the best health and diversity of the herd considered, allowing those with more unique genetic makeup to remain in the park and reproduce. This could include saving more unique colors.”

Unaffiliated individual

Representative Quote: “There should be criteria for horses being added (wether in this option or option C) with extra attention paid to genetic hoof health and stability. Mustangs have wonderful feet due to the conditions required to survive in a wild environment, any whose feet couldn't cut it passed away long ago and they are generally very healthy horses so a good option (and way to get other horses out of holding pens!). These findings can be verified by the research of hoof care experts such as Pete Ramey and Jamie Jackson, who studied thousands of wild horse hooves.

Hoof health directly impacts the rest of horse health as well due to the heavy saturation of blood vessels in the hoof capsule that are naturally stimulating the horses circulation through the expansion and contraction of the hoof in motion. Please consider only adding healthy, sound horses that meet the above criteria and keep our herds going!”

3.13 ISSUES: LIVESTOCK, CATTLE

CONCERN STATEMENT 1: *Longhorn cattle could be managed within the Park in various ways, including:*

- *Removing them entirely*
- *Allowing for a reproductive herd*
- *Continuing current management with a non-reproductive herd*
- *Fencing cattle to prevent transmission of M. bovis, introduction of invasive or noxious weeds from supplemental feed, and prevention of impacts on other resources*

Representative Quote(s):

Organization Type: Non-Governmental; **Organization:** Western Watersheds Project; **Affiliation:** Member

Representative Quote: “Supplemental feeding of cattle to support them in a small area is also concerning. This could potentially lead to the introduction of weeds or other non-native vegetation that can be spread by cattle, reducing the overall ecological function of the region of the Park where cattle are grazed.”

Organization Type: Non-Governmental; **Organization:** Western Watersheds Project; **Affiliation:** Member

Representative Quote: “Livestock grazing has damaged 80 percent of the streams and riparian ecosystems in the arid West and nearly all surface waters in the West contain harmful waterborne bacteria and protozoa such as Giardia due to contamination from livestock waste. Researchers have stated that "the removal or reduction of livestock from vital riparian and wetland habitats throughout the West needs to be given serious consideration by all those concerned with ecosystem health."

Unaffiliated individual

Representative Quote: “The longhorns would be additional attraction for the Elkhorn and should remain as a reproductive herd.”

Unaffiliated individual

Representative Quote: “In my opinion a new pasture separate from the Bison is a good idea. If the cattle are concentrated in a smaller area, park visitors stand a better chance of seeing them. The separate pasture also has health benefits for the Bison as outlined in your LMP.”

Unaffiliated individual

Representative Quote: “If the longhorns are moved, the access to the new site would have to be improved to allow easy access for visitors. It has only been in the last two years that we were able to find the longhorns and that was an exciting find for us.”

3.14 ISSUES: SOCIOECONOMICS

CONCERN STATEMENT 1: NPS should take into account the tourism draw and economic benefits to the area and local communities provided by the wild horse herd. The plan should quantify the costs associated with reducing the herd size and consider ways to increase economic benefits associated with the herd.

Representative Quote(s):

Unaffiliated individual

Representative Quote: “Protecting the herd also increases tourism revenue. Folks that come to see the horses have to stay somewhere, have a place to eat, and hire guides to be able to see the horses. This helps boost the economy around the park. The park could capitalize on this by offering seasonal lodging, such as more modernized campgrounds and cabins, along with a TRNP general store and gift shop that sells memorabilia to support the animal management program within the park. I know that I would buy a tshirt that has my favorites on it. The items could also be sold year-round online. I've seen some great photographs from that area, so local artists could be featured both in the store and online.”

Organization Type: Non-Governmental; **Organization:** American Wild Horse Campaign; **Affiliation:** Member

Representative Quote: “The EA must acknowledge the economic implications that elimination or the drastic reduction of the wild horses residing in the TRNP will have for the American public and the state of North Dakota. Therefore, it must disclose, consider, and analyze the following impacts:

- Impacts of the proposed reduction or elimination removal of the TRNP horse herd to American taxpayers who will fund the costs associated with the capture and removal of the horses targeted for removal. The true costs of the roundup and removals must be weighed against the cost savings of leaving horses in the Park.
- Impacts of the proposed reduction or elimination removal of the TRNP horse herd to the local community, which will see a decline in visitors and tourists due to the reduced opportunities for wild horse viewing caused by the proposed reduction or elimination of this historic herd. Currently, the wild horses in the TR horses are so popular that they are promoted on tourist websites as a featured attraction to visitors to North Dakota, which increasingly drives tourist dollars.”

3.15 ISSUES: VEGETATION

CONCERN STATEMENT 1: *The Park should conduct a forage study and show how habitat health has changed over time.*

Representative Quote(s):

Organization Type: Non-Governmental; **Organization:** Wild Lands, Wild Horses; **Affiliation:** Member

Representative Quote: “Complete a forage study. This meets the goal of the park in determining current landscape ecology.”

CONCERN STATEMENT 2: *If reduction in grazing is required, the Park should reduce cattle and bison use before reducing the number of horses.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “If there is too much grazing pressure remove some bison instead. It seemed to us, when we were there, that there were many more bison than horses and the pastures the bison grazed on were very over grazed.”

3.16 ISSUES: WILDLIFE / SPECIAL STATUS SPECIES

CONCERN STATEMENT 1: *The Park should consider impacts of herd management of horses and cattle on native species, including competition for forage, potential for disease spread, and management actions like installing fencing.*

Representative Quote(s):

Organization Type: Non-Governmental; **Organization:** Western Watersheds Project; **Affiliation:** Member

Representative Quote: “If the Park's herd has not yet been exposed to M. bovis it is essential that the NPS do everything possible to avoid such exposure. This disease has proven extremely deadly leading to instances of 25-45 percent mortality in infected bison herds.[13] As mentioned previously, bison that are experiencing stress might be predisposed to infection. Because of the intensive bison management of round up, testing, and shipping, if M. bovis were to find its way into the Park's herd through cattle, it could be detrimental to the Park's bison, and all bison herd they come into contact with when they leave the Park. While the NPS states that bison and cattle will be kept separately, the best way to ensure no transmission happens within the park is to remove livestock from the Park.”

Unaffiliated individual

Representative Quote: “The critters live on the land and we people are the visitors. Despite what we people "love" to see when we visit these sacred places, there is not unlimited capacity for ungulate populations to graze and drink water on these small two units of Theodore Roosevelt National Park without denigrating the land.”

3.17 ISSUES: WATER RESOURCES

CONCERN STATEMENT 1: *The Park should fix and maintain springs and examine water resource issues related to fencing livestock onto riparian areas.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “The National Park Service needs to look more closely at what occurs when fencing livestock on to riparian areas within the Park. Proposals that fence livestock onto riparian areas can and do result in increased problems such as E. coli.”

Unaffiliated individual

Representative Quote: “In particular, will the park make an effort to fix and maintain the springs in the South Unit that are in need of attention”

3.18 ISSUES: CULTURAL RESOURCES

CONCERN STATEMENT 1: *The plan should consider horses as an integral part of the cultural heritage of the Badlands.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “At the very least, the horses must be considered "culturally significant". They may be descended from Sitting Bull's own herd. They were certainly present in the memory of the Park's own namesake.”

CONCERN STATEMENT 2: *The plan should consider the cultural significance of the genetics of the herd.*

Representative Quote(s):

Unaffiliated individual

Representative Quote: “The original horses may represent a specific lineage not identified in other wild herds.”

Organization Type: Non-Governmental; **Organization:** Chasing Horses Wild Horse Advocates; **Affiliation:** Member

Representative Quote: “There are countless references in Castle McLaughlin's research that describe the wild horses that were present in the area now known as TRNP in the late 1800's and early 1900's. It should be incumbent on the Park to restore as much of the cultural and historical wild horses back into the park boundaries as possible. This can be done by working with Frank Kuntz and The Nokota Horse Conservancy (NHC). Frank Kuntz and his late brother Leo have dedicated their lives to preserving the historic Nokota breed of horses. CHWA believes that there is enough DNA for both the Nokota horses and the current TRNP park horses to make clear scientific decisions on how re-introducing the Nokota horses can help restore the original genetics to this herd while helping to alleviate the current inbreeding problems facing this herd.”

Unaffiliated individual

Representative Quote: “The wild horses that call the Theodore Roosevelt National Park in North Dakota home have roamed the badlands for centuries, and many believe they are descendants of Sitting Bull's horses and related to the rare Nokota breed. Although the wild horses are not protected under the 1971 Wild Horses and Burros Act, they are a significant part of the historical and natural heritage of the park and the state.”

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