

TO: Superintendent Angie Richman
FROM: Dr. Bonnie Kohleriter
DATE: January 15, 2023
RE: Theodore Roosevelt Wild Horses Scoping Comments

DEFINITIONS AND IMPLICATIONS:

The use of words with their following definitions matter when trying to make an audience take a position. With that in mind, this author wants to look at the NPS's use of their words in their scoping comment...livestock, wildlife, native, feral.

NATIVE: Horses, Equus Caballus, are arguably among the most native of any group of ungulates in North America. They evolved here starting back 53 M years ago. They appeared to move both ways across the Bering Straits between North America and Eurasia. With the development of the use of DNA in the early 1980s, Dr. Ross Macphee, curator of mammals of the American Museum of Natural History in New York, and Dr. Beth Shapiro, geneticist, evolutionary biologist, and professor at UCSC, established the evolution and movement of horses. Though credence is given to the Spaniards that it is they who domesticated and brought horses to the Americas, it is uncertain if they, Native Americans as evidenced in folklore, or wild horses on their own returned to the Americas following the ICE AGE. Dr. Shapiro within the Paleogenomic's Laboratory at UCSC has collected and compared 500 pre and historic samples of horses' remains studying the origin, lineage and movement of the horses concluding they are native to North America. (See google: Dr. Beth Shapiro's video with audio). Wild horses were within the boundaries of Theodore National Park long before the Park was established. Bison were introduced to the park in 1950 and elk in 1970, clearly not native to that area. With modern technology and historical recording the NPS needs to readjust its scoping letter writings when it says it wants native species in the park including bison and elk but excluding wild horses.

LIVESTOCK: The internet (google) and Webster's dictionary provide varying and extended definitions of "livestock."

- It says, " In science livestock is cattle, elk, reindeer, bison, deer, sheep, horses, and more"
- It says " Livestock are farm animals bred for home use or for profit."

If the NPS wants to call wild horses livestock, then it needs to call bison and elk livestock as well. The NPS needs to drop the label of "livestock" on the wild horses in the TRNP as they are not being bred for home use or for profit.

FERAL VERSUS WILD: The difference between feral and wild is the following: Wild means the animal is native living in a wild state. Feral is non-native to an area living first in a domestic state and then turned out to be wild. The wild horses of Theodore Roosevelt Park are native to N

America and to that area compared to bison and elk. History wants to tell us they were used by Sitting Bull but were they wild captured then to be used for transport or were they used for transport and then turned out.

The NPS managing TRNP today need to change the verbiage used in their scoping letter as it is incorrect and it is biased resulting in attempts at devaluation and exclusion of its wild horses, an action witnessed all too frequently today in the interfacing with minorities.

THEODORE ROOSEVELT AND THE PARK'S PURPOSE:

The Theodore Roosevelt National Park memorializes Theodore Roosevelt and pays tribute to his enduring contribution to the conservation of our nation's natural resources by preserving and protecting the scenery, native wildlife, and wilderness qualities, the landscapes that inspired Roosevelt and still inspire visitors today.

Theodore Roosevelt knew of this Park's area whose scenery and animals including wild horses he admired. Visitors also admire this area. My family visited this Park back in 2005 and were awe struck by the presence of wild horses who were able to survive in this challenging, dramatic landscape.

These wild horses are native and are a part of America's wildlife. The NPA has an opportunity to protect them and promote them without the harassment of ranchers, herbivore hunters, and frackers who are on BLM and USFS land and who want the resources on the 29,000 acres designated for wild horses for themselves to gain more profit. The NPS also has the opportunity to educate the public about a species who evolved in the Americas 53 M years ago and who helped through early American use to settle our country.

Rather than devalue and destroy the wild horses, celebrate them in their continuing evolutionary development and in their cultural and historic contributions to our country. In addition to celebrating them, manage them, preserving their health and that of the Park's resources. That would be Theodore Roosevelt's continuing contribution to the conservation of our nation's natural resources.

ALTERNATIVES:

The NPS presents 3 possible alternatives to the management of the TR wild horses. All 3 of them seek to extirpate the wild horses which makes no choices. One alternative seeks to remove the horses as fast as possible. A second alternative seeks to remove more slowly but to contracept the continuing horses in the park so they cannot reproduce and replace their losses. Finally, a third seeks to allow only 35-60 horses which threatens the continuing health and presence of the wild horses.

Dr. Gus Cothran, the geneticist for the BLM and USFS for many years repeatedly stated a " minimum of 150-200 wild horses with 50 effective breeding animals is needed in a herd to sustain

genetic variability, viability, and avoidance of crashing within just seven years. Sufficient genes are needed to withstand the possibility of sudden catastrophes and to ward off the possibility of loss of fecundity, inbreeding, anomalies, and crashing within just seven years.(See the BLM Management Handbook) A study of the TR wild horses in 2018 showed with just 70 horses, the suggestion of inbreeding was even present.

The NPS needs to raise the number of allowable horses in order to have healthy wild horses. The NPS needs to explain and justify its proposed numbers as currently the numbers appear to be arbitrary. The NPS cannot insist the public justify its proposals when the NPS does not.

MANAGEMENT OF THEODORE ROOSEVELT WILD HORSES

With potentially healthy allowable numbers the NPS needs to address how it plans to manage the numbers to retain the numbers within that range. The guiding rule as in any species is replacement value. Fertility control treatment and removals need to allow for contraception but also for reproduction for replacement.

In DL Baker's study in 2018 in the use of GonaCon found in one dosage the mares returned to foaling but he found in two, the mares did not return to foaling; then he cut off the study within a short period of time. The use of GonaCon seems promising as a sterilant but not as a reversal to allow for replacement reproduction. It is still in its research stages. While medications can be used in animals while still in their research stage, they cannot in humans. As a human I would not want to use a medication that's unproven. That says to me a lot about some human's value of animals. With a 40 year trial PZP seems not only to provide contraception but also through reversal, reproduction replacement. In the use of such a contraceptive, management needs to speak to the appropriate injection timing to enable the medication to provide for both contraception and reproduction. Each herd appears to respond somewhat differently to PZP application so management of contraception needs to be approached cautiously.

Removals need to consider the age and sex of the horses to achieve herd stability and replacement. In addition, removals need to consider the likelihood of adoption. In the event of removals the NPS states horses first will be offered to tribes with no explanation or justification for this plan. Once again, the NPS can do whatever it wants when the public is expected to explain and justify what it wants. This isn't democracy. Tribes within reservations, on tribal land, don't have the same laws as citizens within the United States. They can and do send their horses to slaughter for profit. Sending wild horses to slaughter is not an acceptable practice recognized by most citizens in the United States and recognized by a majority of Congressional members as evidenced in the last Congress in which the SAFE ACT was approved by a majority of representatives. With removals the NPS needs to draw up a plan that will provide for execution, transparency, and accountability for a safe, long lasting placement for the horses.

AUTHORITY TO REMOVE HORSES:

NEPA demands a hard look the plans will have on the environment. In developing a plan for the wild horses of TRNP the NPS needs to do a scientific study of the will of United States citizens, of the people of North Dakota, and of the people of Medora who will be impacted by this decision. Tourism is the third largest source of income in North Dakota. Observing wild horses within the park can generate revenue for the town of Medora and for the state of North Dakota especially if an educational component is incorporated into the viewing. The TRNP staff maintains people don't come to see the horses but the landscapes and wildlife which the wild horses are. This is an opinion, not a fact. The consensus of the people, namely wanting or not wanting horses to remain in TRNP, needs to involve a wide spectrum of citizens and not just special interest groups and it needs to require a fact-based study.

SUMMARY:

The history of minorities in the United States is being rethought and rewritten...those who are brown, black, Native American Indian as well as those who have been hunted, wild horses, grizzlies, wolves. It is now time to stop the devaluation and exclusion of the presence and rich contributions of minority groups. Modern technology such as the discovery of the use of DNA is reshaping our thinking and in need of being applied as we go forward. President Theodore Roosevelt did not come to the TRNP area to observe ranching. He came to observe nature. President Roosevelt did not come to this area to advocate to destroy a species. Rather he came with admiration in what he saw including wild horses in that area. That is his legacy, the continuance of what he saw, and protecting and managing what he saw in the TRNP area...that is conservation. Angie, Maureen, Blake, Christine you have the opportunity now to tell the story of the native American horse, as it evolved here, and as it is a part of our culture and history, and to showcase our wild horses surviving in a challenging dramatic landscape. Please work with the public to make it happen and not to throw it away for our new generations not to be able to give reverence and connection to our past.

Dr. Bonnie Kohleriter, Science Educator

The Mustang Project and Devils Garden Wild Horse Placement Group

bkohlerite@yahoo.com

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