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Draft Statement relating to Historic Significance of TRNP Park and its features.
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The State Historic Preservation Office has been asked to consider the following context and commentary relating to pending SHPO review of the Park's Management Plan and Environmental Impact Statement currently being developed. The author's purpose in writing is to provide SHPO/AHP staff with additional relevant background relevant to pending reviews.

Background:

In light of the breadth of support from the concerned public, tribal communities, state and federal representatives, this incredibly important 106 compliance review brings together commonsense judgment that unifies people across customary political divides. Sadly, NPS seems intent on continuing to assault the last genetically viable remnants of the irreplaceable horse herd resource. The harm done by the Park's *ad hoc*, unwritten Management Plan over 45-years urgently needs remediation to preserve the Park's historical Significance and critical resource features. An unhealthy adversarial process has taken hold, where NPS seems more concerned with "winning" an argument by outlasting and overriding perspectives that differ from the draft management plan that was originally submitted by NPS to ND SHPO.

There may be a greater opportunity for both sides to "win" if the Park would consider the Park's historic significance more broadly, from a perspective of a cultural significant designed historic landscape with diverse meanings for three distinct cultures that have occupied and productively used the landscape for 200-years. A pristine nature park where species of flora and fauna are selectively eliminated seems unattainable. As clearly explained by the first six chapters of the 2017 CSU Resource Study, the Park's original purpose and meaning was to preserve and protect the natural and cultural resources of the park.

When TRNP was designed and designated as a Regional Demonstration Park the main emphasis was on Theodore Roosevelt's Conservation Legacy in 1883. But the cultural heritage embodied by the Park landscape is broader, and with a much longer history than that, providing many more exciting, richer, and culturally inclusive opportunities for the Park to meaningfully celebrate the cultural context and questions posed by the pending Theodore Roosevelt Presidential Library. In discussing future Human Visions and Environmental Realities, summarizes in anthropological terms that historic resources of the Park preserve and convey a long cultural history of human use of resources in the Badlands, and tensions between people's visions and actions given the realities of the environment. [Gunvaldson, in CSU Resource Study, 2017, p.13] This cultural component is what seems to be sorely missing from the Draft Management Plan.

NPS *Preservation Brief 36*, "Protecting Cultural Landscapes; Planning, Treatment, and Management of Historic Landscapes" [Birnbaum, 1994] offers constructive suggestions about this. Rather than argumentatively discounting public comments that challenge the contrived definitions and preconceived management outcomes for removing a naturally sustainable and adapting living resource that has been present in this landscape for 250 years. Perhaps a SHSND-organized conference modeled after the annual Governor's History Conference would be a constructive way of gathering additional perspectives and fact-finding about the history and cultural heritage issues associated with horses in TRNP.

The public is mindful that there is just no plausible rationale for eliminating those horses, while turning a blind eye toward offers from the State of North Dakota and tribal communities to assist in

preserving the resource. If NPS persists in disregarding evidence of the culturally significant designed historic landscape, they will miss one of the greatest opportunities to present the park landscape to the public in an engaging and meaningful way for future park visitors.

NPS has predetermined that based on contrived definitions and the self-validating process they have devised, there will be "no negative impact" on the cultural heritage resource. There is substantial, insightful information already on the record that NPS seems inclined to disregard. Those preparing the management plan seem hopelessly unprepared to deal meaningfully with cultural heritage issues based on a biased and inadequately supported analysis. Eventually this refusal to see the landscape in cultural terms will put ND SHPO in an untenable position of having to conduct their own due diligence and discovery, far beyond the usual scope of 106 review and comment.

NPS seems to be in denial of obvious negative impacts from eliminating horses from TRNP. The stage-managed public comment process has yielded an inadequate "management plan" that fails to address cultural heritage issues and obvious tribal concerns over an irreplaceable heritage resource. Anticipating an eventual FONSI, NPS will clearly need to be pressed hard by the Section 106 process to consider cultural landscapes and biotic cultural resources. Especially compelling in this instance, the designed landscape implemented through federal work relief programs as a Regional Demonstration Park (adopted in 1946 as Theodore Roosevelt National Park), continues to hold cultural significance for three distinct culture group discussed in this summary.

Having undertaken a literature search, and after gathering all the background resources I could locate, I have prepared a bibliographic "Resource List" relating specifically to the "Cultural Significance of the Designed Landscape of Theodore Roosevelt National Park." The concerned public might well imagine that NPS has access to expertise about culturally significant landscapes. We find ample information embodied in previous historical, anthropological, and cultural geography studies. Professionally prepared academic analyses have been submitted to the NPS District Office, making a reasoned, compelling argument for the Park's historic Significance using methods of analysis developed by NPS *Preservation Brief # 36: "Protecting Cultural Landscapes" Planning, Treatment, and Management of Historic Landscapes,*" (Birnbaum, 1994).

A well-reasoned significance statement supported by cultural heritage evidence could help underpin SHPO's eventual determination. Stemming partly from the MPDF Context for "Federal Relief Construction in North Dakota, 1931-1943," which I prepared for NDSHPO (Martens, 2015), it seems appropriate to address the historical context of the Park as a historically significant designed cultural landscape. The MPDF document recommends specific criteria for significance of State Parks and State Historic Sites (Section F, Page 15-16) designed as federal work relief projects as collaborative efforts involving Director Russell Reid of the North Dakota State Historical Society, expert NPS staff and design teams, and constructed by work relief teams under CCC and WPA programs.

Communications from the National Park Service have been preoccupied with word play and contrived definitions that attempt to prove, in quasi-scientific terms, that horses are somehow an "invasive species." The horses are present in the Park, in part because each of the three cultures that dwelt in that landscape could see a benefit from grazing horses there in a unique environment that protected valuable stock from severe winter climate. Horses are no more "invasive" than Theodore Roosevelt, the Marquis DeMores, or flocks of tourists that come to the park. That is a fundamentally pragmatic argument. The more compelling understanding would be that as spirit beings supporting humans in a give and take relationship, the horses were born into the Little Missouri setting where they adapted and found an ideal fit within that environment. U.S. federal policy has long favored "removal" of people and cultural resources like horses, as a way of controlling populations that have a birthright in the landscape.

This draft "white paper;" (i.e., a summary abstract of reasoned arguments submitted as NPS public comments. Academic writings and scientific studies about cultural heritage only scratch the surface of people who understand the horses as a Sacred Nation of spirit beings, based on firsthand, lived experience. Horses that are adapted to the northern Plains have been an essential

medium of commerce and cultural exchange since at least 1750. Lakota horses are culturally understood as having been brought to the Little Missouri Badlands from Spanish sources before 1700, described by most indigenous cultures as “big dogs.” [Hämäläinen, 2003, 2011] Tribally managed and cultivated horses revolutionized transportation, hunting, and warfare. In 1738, La Verendrye observed Hidatsas involved with trade sources from in the Northwest Coast, exchanging horses from Assiniboine, Cree, Shoshone, and Blackfeet cultures. By 1797, David Thompson recorded Mandan and Hidatsa villages adapting horses in the Little Missouri earthlodge settlements.

Horses adapted to the Badlands landscape context and, in turn cultural practices adapted through purposeful, selective herd management practices. Horses had both economic and spiritual value. Chronic scarcity figured prominently in ritual stealing of horses and their high valuation as a medium of exchange. With persistent displacement by Euro-American immigrants and U.S. federal oppression of indigenous cultures, eradication, disposal, and slaughter of Indian horses became another sad chapter of legacy. The fine horses brought back from Canada by Sitting Bull, and relinquished at Fort Buford as a condition of surrender, found their way in ownership by Huidekoper and DeMores cattle ranching, and reportedly into the hands of Theodore Roosevelt. The genetically adapted horses inherited by the Park service included a vigorous mix of horses from each of these cultures. Horses are no more an “invasive species” than Teddy Roosevelt or vanloads of tourists in the Park.

One criterion for significance under the federal Historic Preservation Act and as amended for NAGPRA is the potential for a historic resource to yield future knowledge and cultural understanding. We trust that the State Historic Preservation Office (charged with protecting resources of historical significance) will pursue the point that free-ranging horses must be preserved and protected as an irreplaceable feature of historic significance and cultural value. The natural lands within the park and the horses are historically Significant features of the heritage of three cultures. As suggested by the Governor’s office and several knowledgeable horse advocates, the genetic strength and viability of the horse herds at TRNP must be repaired under a carefully considered management plan as an essential resource feature of the Park. But it should be a fully informed resource preservation plan rather than a plan for elimination.

I’ve been challenged on one aspect of my reasoning about the horses as a significant feature of the historic landscape, and I appreciate the chance to flesh out that argument. NRHP Criterion “D” affirms Significance based on the potential for future discovery based on archaeological or anthropological evidence. I believe that new and ongoing discoveries about the genetics of evolved horses herds merits long-range consideration of how animal species adapt to environmental change. This is an important enough opportunity for discovery to merit involvement of international researchers in equine herd management.

It would clearly be appropriate for the horse management plan being carried out by NPS (and under proposed modification), to involve equine geneticists and herd management experts in understanding the adaptation – not just of individual horses, but also the evolved adaptation over many decades -- of the herd as a coherent living organism. There has been important recent biological analysis of the ways random natural selection strengthens and improves the genetic vigor of a herd in adapting to climate change in isolated landscapes. Scientists should consider the herd as an adaptively evolved super-organism, rather than simply focusing on tracing genetic lines of individual horses.

The National Park Service has a duty to come to terms with the reality that horses in the Little Missouri Badlands embody historically significant relationships between three distinct cultures; the Standing Rock Lakota Nation, the MHA Nation, and belatedly the frontier ranching culture. Thus far, important tribal perspectives have not been heard or considered. This must all be carefully addressed by the Park Service in a pending Environmental Impact Statement and a balanced Horse Management Plan. Those of us from Euro-American immigrant backgrounds can only be embarrassed by the way our culture treats all spirit beings as tangible “things” to be managed, counted, “commodified.”

If we open our eyes and our hearts, the festering controversy over Park Service intent to eliminate horses from the landscape might lead us to a place where our “modern” world view can be redeemed by spiritual healing. The remnant horses bands offer a healing power well-understood by elders from Lakota and MHA Nations who have a centuries-old relationship to that place. Perhaps the sacred trail ride proposed by the Lakota Nation from the heart through the *Sun'ka Wakan Hotanin* can be a step toward spiritual healing.

Academically-published resources are an inadequate substitute for oral history experiences of Lakota and MHA people. In an informed way, twentieth-century academic scholars have examined the Northern Plains as “a World Divided by Horses.” (Hämäläinen, 2003), Hidatsa sheltering of horses in earthlodge villages (Wilson, 1924), and three introductory chapters on Indigenous Visions and Declining Independence in the excellent “Historic Resource Study of Theodore Roosevelt National Park” (Fiege, *et al.*, Colorado State U. Public Lands History Center, 2017, pp.7-92). Staff at the State Historic Preservation Office are encouraged to become familiar with these perspectives while the pending NPS plan is under development.

Remarkable scholars like Dr. Castle McLaughlin (1989, 1991) have compiled well-supported assessments of the genetic and cultural significance of the horses as a feature of the landscape. The abrupt change in NPS agency thinking, values, and interpretive priorities for TRNP is a very recent and probably transitory change, objectively addressed by Janet Ore in the CSU History Center study (2017, pp.135-179). Can there be any doubt that irreplaceable living resource assets (like evolved sixth-generation horses) are far too irreplaceable as features of cultural heritage to be eradicated by manipulating populations and herd genetics? Great harm has been done by capricious mismanagement of the horses for the past 50-years. Petty (1968), Reid (1940), McClelland (1991, 1993) all consider the interpretive meanings of TRNP based on a much more long-view cultural perspective than trying to reduce the Little Missouri Badlands landscape as a pristine “nature park.”

The Park’s far greater significance is as a cultural heritage resource, given all the complexities of the landscape’s meanings – both sacred and profane – reflecting the use and occupancy of the Little Missouri Badlands by three distinct cultures, all of which are embodied in the Park and merit consideration. That is much closer to the original vision of the Regional Demonstration Park in a landscape that was degraded by drought and overuse (Reid, Gratton, WPA and NPS masterplanning documents in collections of SHSND and TRNP, 1936-1942). As a “Significant Designed Cultural Heritage Landscape” the landscape’s historic significance can be better examined and assessed by anthropologists, historians, and tribal elders than by environmental scientists and resource management administrators.

It certainly seems plausible that any final action or determination on Section 106 compliance will depend not only on an enumeration by NPS of proposed outcomes, but also a careful consideration of environmental impacts on a well-defined historic context with demonstrated significance according to NPS procedures and guidelines for demonstrating Historic Significance of a cultural heritage landscape.