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Regarding: Livestock Plan – Theodore Roosevelt National Park – Public Scoping Phase of NEPA

Livestock Plan Description:

The Theodore Roosevelt National Park Service is developing a Livestock Plan and Environmental Assessment (EA) to address livestock, horses, and cattle, within the park, under relevant laws, regulations, policies, and park management priorities including the conservation of native species and natural prairie ecosystem functions.

I am submitting comments on the preliminary alternatives, proposed action, and what the EA should address and analyze. Here is the Theodore Roosevelt National Park Service Alternative and my response.

I AM AGAINST ALL OF THE Alternative A (No Action Alternative: continued herd management under the 1978 EA and 1970 Management Plan) as written.

The national park Superintendent, Angela Richman, and her staff have not presented “reasonable alternatives” but has presented a piecemeal plan with limited scope in Alternative B & C. Using “conservation of native species and natural prairie ecosystems” is a scape goat approach to enforce the Department of Interiors intent to eliminate wild horses from public lands including this national park which fall under the direction of the Department of Interior. The National Park Service carries out its responsibilities in parks and programs under the authority of Federal laws, regulations, and Executive Orders, and in accord with policies established by the Director of the National Park Service and the **Secretary of the Interior**. The Biden administration proposal to continue the Trump [roundup plan](#) to remove 90,000 wild horses and burros from public lands over the next five years at a cost to taxpayers of nearly \$1 billion. You are part of the public lands. Soon

the national park will be the only place visitors will be able to observe free roaming wild mustangs.

National parks are governed by a law called the National Environmental Policy Act, or NEPA—one of the most important environmental laws in the country. NEPA requires that federal agencies must measure the environmental impacts of any proposed actions that would affect federal lands and must also allow public comment on these proposals. This means that **we as Americans not only own these places together, we have a right to tell the Park Service that we agree or disagree with how they want to handle a particular issue that affects our parks.**

This statement is out of regulations IN THEIR SCOPING RULES:

Comments that cannot be considered include comments for or against an action without any reasoning, comments that only agree or disagree with NPS policy, comments without justification or supporting data, comments that take the form of vague, open-ended questions, and form letters.

An Environment Assessment (EA) does not support sufficient NEPA requirements when changing the landscape of the park. Eliminating the wild horse herds that were present in the area before the Badland area became a national park is changing the landscape. An Environment Impact Statement (**EIS**) **functions as a more holistic, landscape-level planning with greater details to promote a natural prairie ecosystem not only for native species.**

The NPS formed under the Organic Act of 1916 with the mission “to conserve the scenery and the natural historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner as to leave them unimpaired for the enjoyment of future generations.” Further amendments solidified the NPS’s value of preserving the “naturalness” of parklands.

Park Management Priorities

Horse numbers have historically been managed at the park through periodic (every three to four years) roundups, utilizing helicopters to herd horses to a handling facility. Removed horses are then sold at public auction. However, the park is exploring alternative methods for herd management, including:

1. **Contraceptives:** In 2009, scientists from Colorado State University began a research program to evaluate the effectiveness of GonaCon® (an immunocontraceptive agent) for controlling reproduction in feral horses at the park. The research is complete, and results are encouraging.
 - 2.
 3. **Low-Stress Livestock Herding:** Low-stress techniques have been used since 2008 for gently herding escaped bison back onto park lands. Similar methods are effective at controlling the movement and capture of horses. The technique is currently under structured evaluation as a practice for horse capture.
 4. **Corral Trapping:** Corral traps are effective for capture of feral horses on other federal lands. During 2015, the park established a corral trap in an area that horses frequently visit. Though using bait (e.g. water and mineral blocks) is minimally effective at luring horses, the corral trap facilities are used in combination with low-stress herding to capture horses.
 5. **Chemical Immobilization:** Tranquilizer darts are widely used for wildlife capture. They allow managers to selectively handle individuals with minimal impact on other members of the population. Chemical immobilization is utilized to capture horses at the park, and this tool is under evaluation to ensure safety of the animals.
 6. **Adoption Program:** The park works with the General Services Administration (GSA) to transfer animals to private ownership.
 7. **Genetics Research:** Hair samples from horses are processed for mitochondrial DNA sequence at the University of North Dakota and for nuclear microsatellite data at Texas A&M University. Molecular data is used to evaluate the genetic diversity, ancestry, and demography of the herd to inform management decisions.
- Role on the Park Landscape
 - Balance with natural and cultural resource management priorities are developed by the park management.
 - The government regulates the activities of businesses in five core areas: **advertising, labor, environmental impact, privacy and health and safety.**

Environmental Impact

Polls show that [3 in 4 Americans want wild horses protected](#) on our public lands, and [80% of Americans oppose horse slaughter](#). There must be regulations set for Tribal distribution of wild horses to the Tribes. They should not be allowed to send wild horses

from the National Park cannot be sold to kill buyers or slaughter houses outside of the United States.

The town of Modera depends on and prospers from tourism.

Health and Safety

We go to these special places to hike, camp, hunt, fish, and engage in recreation that revitalizes our souls and connects us to history and nature.

Conservation of Native Species

- Impacts on Native Species
 - Virtual Public Scoping Meeting on January 12, 2023
 - Q. Have you seen a decline in native species in the South Unit.
 - A. No change in native species in the South Unit.
- **Non-Native Species**
- Bison VS Horses
 - Bison **graze the grasses at different heights, providing nesting grounds for birds**. So do wild horses.
- A horse is considered feral, selectively bred by humans for domestic and agricultural purposes, turned loose on the plains . It has been decades, since 1939 that this herd in the Theodore Roosevelt National Park have has been selectively bred by humans for domestic or agricultural purposes. They were in the park when it was declared a national park. That was 84 years ago.
- Conservation of our Nation’s Resources by preserving and protecting the landscape that inspired Teddy Roosevelt
- Indian Tribes send many horses to slaughter ever year. GSA should be the only way these horses leave the NPS land.

Alternative B (Action Alternative: expedited reduction of herds to no livestock), and Alternative

Relevant Laws

Regulations

NEPA requires that prior to funding, authorizing, or implementing an action, federal agencies must **consider the effects the proposed action may have on the environment, and the related social and economic effects**.

Theodore Roosevelt National Park Superintendent should understand the environmental consequences of removing the wild horses from the park. The wild horses enhance the environment.

The Park Management Priorities in Alternative B and C

Conservation of Native Species

Alternative C (Proposed Action Alternative: phased reduction of herds to no livestock). This newsletter includes more details about the alternatives.

Relevant Laws

Regulations

Policies - "reasonable alternatives"

Park Management Priorities

Conservation of Native Species

The Bison are native species. They were not present in the park when Roosevelt made this a national park. The species were reintroduced into the park in Do the bison have any negative impacts on their ecosystem?

Bison have trampled archaeological sites, affected water resources, and damaged native plants through overgrazing and reducing plant diversity. "The basic quality of the meadow ecosystems is changing because of grazing and some plants aren't growing anymore.

It is the policy of Congress that wild free-roaming horses and burros shall be **protected from capture, branding, harassment, or death**; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands.



Theodore Roosevelt National Park is one of the few national parks where visitors can observe free-roaming horses. Their presence represents Theodore Roosevelt's experiences here during the open-range ranching era. **There are no wild horses roaming in the geographic interior of the Greater Yellowstone Ecosystem.**

Genetic Diversity

Assateague Island National Seashore

- More than 300 wild ponies wander the beaches, inland pine forest, and salt marshes. They live on the islands of Assateague (Maryland) and Chincoteague (Virginia). Both islands are largely made up of national park areas. The Maryland herd is managed by the National Park Service.

The wild horses live primarily in the northern portion of the Outer Banks, which includes **Corolla and Carova Beach**. The horses roam the northern portion of Currituck Beach, which is a rural area with little development. They now have access to 7,544 acres (3,331, acres are public land and 4,213 are privately owned).

Some of the most popular Ocracoke locals are the Wild Ponies, which are protected in a secluded 180 acre area enclosure on the soundside of the Cape Hatteras National Seashore, but can still be enjoyed by anyone passing through the island on NC Highway 12.

herds of wild horses and bison roam the prairie in this surprisingly diverse preserve south of Gainesville. Paynes Prairie is unique in many ways. Nowhere else in Florida can visitors experience wild-roaming bison and horses.

Shackleford Banks, the southern-most barrier island in **Cape Lookout National Seashore**, is home to more than 100 wild horses.

Cumberland Island National Seashore, one of the many islands off Georgia, is a stunning place to explore. One of the area's best-known inhabitants is the **Cumberland Island horses, which are the only herd of wild horses on the Atlantic coast that aren't managed.**

Cumberland has the only herd of feral horses on the Atlantic coast that is not managed (no food, water, veterinary care, or population control). The herd is affected by all the natural stressors faced by native wildlife. The lifespan of horses on the island may be as long as 9 to 10 years.

Wild horses roam the beaches of the Outer Banks and Crystal Coast. Take a guided tour to see them at **Corolla and Shackleford Banks**. For 500 years, the most enduring – and endearing – residents of the Outer Banks, the wild Colonial Spanish Mustangs, have called this sliver of land between sound and sea home.

How many wild horses are in Carova NC?

Several herds of wild horses—totaling **around 400** in total—live throughout the barrier islands and have become a sought-after tourist attraction in their own right. They can be seen strolling along the beaches and wooded areas near Cape Lookout, Beaufort, Ocracoke, and Corolla.

n the Virginia district, the wild horses are commonly referred to as “**Chincoteague Ponies**”. Unlike the Maryland district where the horses are free to roam, the Chincoteague Ponies are fenced off the road and trails in two separate large management areas of the refuge resulting in a northern herd and a southern herd.

Increased tourism

National parks are recognized as premier tourist destinations and marketed internationally as a prime reason to visit America. As a result, they support more than \$30 billion in economic activity each year and more than 252,000 private-sector jobs in communities around the country. Tourists intentionally seek out national park destinations when they travel because they understand these sites are the very best our country has to offer. And whereas state and local park information varies greatly from place to place, visitors to national parks can expect consistent, reliable resources for planning and enjoying their trips—from comprehensive online information to quality hiking maps to well-maintained trails.

Visitors expect something different when they enter a national park—they expect a world-class experience. And that’s exactly why they visit Theodore Roosevelt National Park.

BIRTH CONTROL

The primary available tool recommended by the National Academy of Science (NAS) is the PZP birth control vaccine, which has proven safe, effective and economical in humanely reducing reproductive rates on the range.

I request the updated NPS alternatives based on public input following the closing of the scoping period be publicly published on any media, public forum, or any internet media sources about the intended removal of the wild horses from the national park which is a public place. The public is intitled to be informed and the issue of the removal of wild horses should not be hidden in the deep rules and regulations of the government archives.

Thank you for listening.

Sincerely,

**Janett Heckert,
Wild Horse Advocate**