

January 21, 2023

Superintendent, Theodore Roosevelt National Park
P.O. Box 7
Medora, ND 58645

RE: Scoping Comments for the NPS Livestock Plan for Theodore Roosevelt National Park

Good Day,

My name is Tammi Adams and I am submitting the following comments as an individual taxpaying citizen of the United States of America, as a member and volunteer for Wild Horse Education (WHE), and as an authorized representative of Wild Horse Education, its members, board, and volunteers. I have been visiting Theodore Roosevelt National Park regularly since 1976, often four or more times a year. While I have greatly enjoyed viewing the bison, wild horses, and longhorn steers, with the removal of two of the three highlights, my trips to North Dakota shall diminish should the agency's preferred option in this Livestock Plan be chosen.

After attending (and providing comments – none of which were addressed during the meeting) the public scoping meeting held by the National Park Service (NPS) on January 12, 2023, several comments and concerns came to mind regarding the Theodore Roosevelt National Park (TRNP) Livestock Plan. The following comments regard my trepidations towards the NPS's Livestock Plan (LP) and the credibility behind the LP.

1. First and foremost is the NPS egregious premise for this LP and the removal of wild horses and longhorn steer because they are "livestock." The NPS has arbitrarily decided that wild horses are not native to the North American continent – this is scientifically proven false. Wild horses are a native species to North America; wild horses are NOT livestock. It is always amazing how Department of Interior (DOI) agencies pick and choose which scientific research they believe and labels wildlife in accordance to their intended actions. Despite the NPS's arbitrary defining of wild horses as "livestock," current and statistically repeatable scientific research proves otherwise.

From securely dated sediment samples, scientific experts identified DNA of *Equus caballus* (the North American Horse) in the Yukon of Canada from permafrost samples dating ~9,700 years before this present time (cal BP). These findings post-date previous macrofossil evidence (such as bones, teeth and soft tissue) of *Equus caballus* found in Alaska by some 3,300 years, indicative of a cryptic population and proving *Equus caballus* did not go extinct and is native to the North American Continent (NAC). The research was published online on December 8, 2021 with support of the National Academy of Sciences, *Collapse of the mammoth-steppe in central Yukon as revealed by ancient environmental DNA* ([Collapse of the mammoth-steppe in central Yukon as revealed by ancient environmental DNA - PMC \(nih.gov\)](#)) – link provided for your review. (While some believe this research had competing interests, regulating authorities confirm that the research presented in this paper was completed prior to funding by the CANA Foundation.)

Further supporting the argument that wild horses are native to the NAC is that the permafrost samples collected in the Yukon permafrost were evaluated by at least three other international

laboratories who utilized different laboratory analytical procedures, yet confirmed and validated this report's findings (McMaster University, CA and University of Alberta, Edmonton, CA). Again, solid scientific research proving that *Equus caballus* is, in fact, native to the NAC.

Please provide scientifically collected DNA data from the wild horses in TRNP proving the wild horses are NOT of the *Equus caballus* kingdom in the coming Preliminary Environmental Assessment (PEA) to support the NPS labeling of wild horses as "livestock."

2. It is outrageous for the NPS to "interpret" what Theodore Roosevelt "intended" his namesake park to represent over 100-years after his passing. It is fact that wild horses were within North Dakota (and the TRNP) while our ex-President was alive and owned his ranch in North Dakota. Proven by his many quoted sayings expressing his "admiration" of those willing to "break a wild mustang."

During the public scoping meeting, an NPS employee repeatedly stated that the NPS believes that Theodore Roosevelt never intended for national parks to have livestock reside within the park. Where NPS got this information is ambiguous, as the law was not referenced in the public meeting. If this is in actuality law, the NPS is legally bound to keep livestock out of the NP systems. Albeit Theodore Roosevelt was indeed a rancher, removal of the longhorn steers (livestock) seems prudent, removal of wild horses which ARE NOT LIVESTOCK (despite what NPS is trying to sell – see comment #1) is NOT valid based on the arbitrary definition recently selected for wild horses by NPS. Noteworthy, was the NPS representative clearly stating in the public meeting, "Livestock grazing is responsible for 'impacts' (degradation) to the park's natural ecosystem." (Too bad the BLM was not listening; this NPS message would direct the BLM to significantly reduce the numbers of livestock on our public lands. Rangeland degradation research has been consistently provided to BLM for decades!)

Please provide the federal law(s) indicating livestock grazing is not allowed in national parks in the PEA.

3. NPS personnel stated additional LP options would be appreciated. One of which would be: Remove longhorn steer (livestock) as defined by law in the preferred plan option to restore the natural habitat and ecosystem of the Northern portion. No removal of wild horses from the Southern portion of the TRNP. (Potential for PZP fertility control incorporating darting for administration could be an additional option along with no removal of wild horses.)

Please include this proposed action in the following PEA.

4. Furthermore, since wild horses are native to the NAC, any arbitrary rangeland degradation projected towards wild horses is moot. The natural ecosystem of TRNP has not changed since before the park was designated and wild horses roamed freely in North America (i.e., North Dakota). However, fencing that impedes movement of wild horses within the southern portion of the TRNP should be removed.

Please provide verification in the PEA that all fencing shall be removed from within the South park area to improve wild horse natural movement. Additionally, please provide historical and current rangeland data in the forthcoming PEA.

In April of 2021, Sec Haaland promised in her Secretarial order, "...to improve agency transparency and public engagement in the decision making process." Thank you for the opportunity of public engagement to provide my comments for the **Theodore Roosevelt National Park Livestock Plan**. However, DOI and its agencies blatantly ignore the law, falsify information to provide "need and purpose," fail to provide requested information, lack transparency of data, etc., and comments presented herein reflect public mistrust. We look forward to a direct written response from NPS regarding these scoping comments and concerns.

Best Regards,

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As herself, a taxpayer, a private citizen, member and volunteer for Wild Horse Education, and as an authorized representative of Wild Horse Education, their individual board members, and members worldwide.