

January 29, 2023

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Angela Richman
Acting Superintendent
Theodore Roosevelt National Park
P.O. Box 7
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Re: Livestock Plan

Ms. Richman;

Thank you for this opportunity to comment on the proposed Livestock Plan. After much time and research in an attempt to compile compelling evidence in a grand slam style comment on this “Plan” that is being presented one finds there are more questions being left unanswered than a simple comment can adequately express.

Firstly, Theodore Roosevelt National Park is in the unique position of having a new species developing within its borders. A species that has genetic tie backs to ancient horse breeds that have since been declared extinct on our continent. These markers do not appear in other herds of feral horses on this continent. (Ovchinnikov IV, Dahms T, Herauf B, McCann B, Juras R, Castaneda C, et al. (2018) Genetic diversity and origin of the feral horses in Theodore Roosevelt National Park. PLoS ONE 13(8): e0200795. <https://doi.org/10.1371/journal.pone.0200795>)

Is this administration seriously considering the genocide of an entire species? A species that has originated because of the park system that is now failing them. Does that not fly in the face of the National Park services manifesto of conservation?

These animals were present before the park became a park, and they have been allowed to continue to exist within its confines since its inception and grand fencing project.

Historical records show a great round up was held and over 200 animals were mustered out of the park. 99% of them were branded and yet 75 of them were turned back as well as an unknown number that evaded capture thus creating the herd we are now debating over.

Follow up questions to the above information:

1. If branded animals were turned back into the park, who owns them, and now their progeny? Would those original brand holders have a say in the deposition of these grand-generations?
2. Simple math shows that 75 is significantly more than 1%, why were those animals chosen to be turned back into the park?

The horses have been cited over and over again in management plans, and up until now have never been considered the nuisance that this administration is making them into.

The management plan the park seems to have been following is Leave them alone until they hit critical levels and then uncaringly reduce the herd to nearly nothing. The park and their feast or famine "management" of the horses have been the ones to cause the genetic bottleneck addressed in several research papers.

When the public reached out and said they would like a more proactive approach to actually managing the horses, thus far the park response has been that of a petulant child "fine then I'll just take them all away!"

Is the park administration really putting itself in the position of adversary to the public it claims to serve? Admittedly, the approach of the public that finally started this travesty was, let's say, antagonistic. There is a long history of peaceful work with other advocacy groups and pressure from the more understanding public to adjust the way the herd has been handled.

It becomes incumbent on both sides to find a way to negotiate to the middle ground between two extremes. The extremes being, Ultimately no horses, or No management. The public did not ask for NO Management. We are not asking for carte-blanche, let the horses live wherever, whenever, however, or at least the groups that I interact with certainly aren't!

Instead of trying to remove the horses instead of addressing the fact that the lack of management is a slap in the face to the collective public that does not wish to see the herds decimated.

The park has had an active, albeit unwilling, hand in the current situation these horses are facing, genetic stagnation, recessive genetic disorders gaining a foothold. This member of the public would like the park to take a more active role in those management. I would suggest turning blood stock from other wild horse herds across the nation. Bonded herds of mares rather than stallions, and turning them into parts of the park that horses have not been found in to encourage the herds to spread themselves out and reduce the impacts the inhabiting their usual haunts.

The park could stand to take a more active role in the reproduction of these horses by using a wholistic herd management solution include field vasectomy for the stallions as well as continuing birth control in the mares. However, continuing with the hands off approach most definitely needs to stop.

I implore TRNP to look at the treasure trove they have within the boundaries of their own fences. A genetically diverse unique species that is there ready for the study! In addition to having one of the only completely closed herds in the nation There are several to dozens of studies that these herds have provided data for, not the least of which are the studies that Park Staff Biologist Blake McCann has personally contributed to. I do not think the administration has fully considered the potential economic devastation this plan could create within the community the park calls home, and in the wider region.

TRNP is the tourist attraction for Western North Dakota, and these hoses have a huge impact on those visitors. In a grassroots survey data was gathered that supports the far reaching

potential economic impact that this removal could cause. I have copied the highlights into this memo below, without the ability to attach documents to this electronic submission form I am unsure how to submit its contents entirely.

(https://docs.google.com/forms/d/1kAuCrdAurDVvi-H_AcWJvsZ14VO68A0pNK5AJZbwAmA/viewanalytics?chromeless=1&fbclid=IwAR2G2iTPea6ItXas0-rVmSsg8XcYrCfm-dVgTVOlngux1v2mszw6X6XPG0)

How many participants in the survey have never been to the park: 75
(These responses were excluded from monetary and day's stayed statistics)

Unique responses to the entire survey: 1364

Age Demographics:

18-24 2.3%

25-29 3%

30-34 4.9%

35-39 6.4%

40-50 16.5%

50+ 34.6%

Where do you live:

Closest- Medora

Farthest Away: Germany, Australia

Average amount of 2022 visits : 2.84 visits

Low- 0 High- 616

Average amounts of visits per year : 20.51 visits

Low- 0 High-1000

Park Entrance Fee :

Day Fees : 62.8%

TRNP Yearly 19.5%

Interagency Pass 17.7%

What Unit do you Visit Most:

North 9.5%

South 90.5%

Why do you visit the park

Wildlife 10.2%

Sightseeing 8.7%

Horses 68.8%

Other Text Answers :12.3%

How many days do you typically spend:

Average 3.75

Low- 1 High- 10

Where do you stay:

Medora 61.6%

Dickinson 12.6%

Camping 9.9%

Watford City 2.7%

Belfield 2.2%

All Other Text Answers: 11%

Accommodations

Hotels 42.5%

Campgrounds: 31.7%

Family 9%

Air BNB 3.4%

Home: 2.4%

Other 2.2%

All Other text answers 8.8%

How much does each trip cost?

Low-\$0 High \$7000

Average \$881.43

Total recorded \$704,260

Will the Removal impact your reason for visiting the park?

Yes 93.7%

No 2.1%

Maybe 4.2%

Responses to: If yes can you explain:

1269 Unique responses

Open Forum:

912 unique responses

Please, reconsider the “Options” that were presented in this last round of public comment period. Please be willing to find the middle ground between all or nothing that is being provided. Please, allow the learned people on your staff that have the knowledge and the heart to write a

viable management plan for these beloved horses. Please do not commit genocide on an entire unique species, they deserve to be in the badlands as much the rest of the species that have had to be reintroduced to this environment. The horses have been there since before the park was the park.

Though this may come across as grandstanding to a more learned opinion.

The park is, with this so-called process to involve the public, very much alienating the public by giving them prepared scripts and very obviously biased moderators for these "conversations" which aren't conversations at all. It has been very obvious at each "input meeting" there was a prepared list of questions the panel would address and that would be that.