

Comment submission to NPS re: TRNP wild horses

Please accept the following comments on the Livestock Plan Scoping Newsletter for the Theodore Roosevelt National Park's (TRNP) Livestock Management Plan (LMP) for its wild horses.

I attended the virtual public scoping meeting on January 12, 2023 where I learned that TRNP believes the park management plans are confined to current relevant laws, regulations, policies, and park management priorities and NPS directives. Park staff categorically claimed they must follow current park regulations. I would like to address this point first to pave the way for the rest of my comments.

- TRNP laws, regulations, policies, and park management priorities can be amended and changed. They are not intended to be forever and absolute! Even those directives coming from the National Park Service can be adapted or changed. An example of this is the management at Assateague Island National Seashore where wild horses have been successfully managed for over 30 years. I will elaborate with proof of concept on this fact further below.

Further points of consideration for the TRNP Livestock Plan with the required “*information that can be used when developing alternatives, present reasonable alternatives...*”

- The TRNP Livestock Plan, as drafted, erroneously refers to the wild horses as “livestock,” inferring that they are not a native species. Wild horses **are** a native species to North America. In the virtual scoping meeting, Blake McCann said that historical records and genetics show the TRNP horses to be “domestic stock.” While wild horses closely resemble their domestic cousins in appearance, they are vastly different in behavior and other ways. You must take into account the rapidly emerging scientific research - and archeological **proof** - that America’s wild horses are native species. Dr. Ross MacPhee is the curator of the Division of Vertebrate Zoology at the American Museum of Natural History who has scientifically studied horse evolution for many years. MacPhee declares “*The family Equidae evolved on this continent; it is as American as anything you could possibly imagine. That was 55 million years ago. Progressive evolution occurred thereafter, eventually culminating 1.8 million years ago when a horse very like modern horses evolved... most people regard bison as a native species even though it has only occupied North America for the past 125,000 years.*” Wild horses did not just materialize in North Dakota when the TRNP was designated. Wild horses have been observed by humans in the TRNP area for centuries, in native cultures and documents from early European/American explorers. Further, The TRNP specifically includes wild horses in its definition of “wildlife” for purposes of its prohibition against “Disturbing Wildlife” in the Park. Alternately, the definition of livestock in all major reference works is noted in some generic form of “domestic animals kept or raised for use or pleasure.” The wild horses of TRNP do not in any way fit this definition.

- In the Scoping meeting, Blake McCann stated that there was a “clear distinction” between what is wildlife and what is non-native. However, the “clear distinction” that TRNP holds, as shown above, is erroneous and unscientific. With documented and peer reviewed scientific evidence, the TRNP wild horses should be designated as native species wildlife, with equal native status to the bison in TRNP.
- Currently, horse management is guided by a 1978 Environmental Assessment (EA), and cattle management is guided by a 1970 Management Plan. With these two documents showing the horses and cattle as different park entities, their separation should remain so, and the native wildlife horses should be managed separately from the cattle in the park. While I hold no bias or position against the cattle in TRNP, as a definite non-native species, they should be evaluated separately from the native species wild horses.
- Regarding the 1978 EA, it is old and outdated. Documents such as these must be updated even more frequently than the normal 10 years.
- The Livestock Plan as currently drafted would have a significant impact on tourism to the park and surrounding communities. In the Scoping meeting Maureen answered that comment by saying that protecting the scenery and wildlife was what Teddy Roosevelt championed. As the mandate for following Roosevelt’s ideals, that is what the park follows, to keep the wildlife community and habitat intact. As noted above, the wild horses are native wildlife in their native habitat. But, that does not address the negative impact on tourism that removing the horses would cause. The TRNP horses are beloved by visitors from all over the country and the world. Proof of the impact that removing the wild horses would cause can be found in a USA Today *10 Best Readers’ Choice Awards in 2017* which found the Pryor Mountain Wild Mustang Center in Lovell Wyoming to be the Number One Best Attraction in the state of Wyoming. Keep in mind, Wyoming is the home to Yellowstone National Park! Tourism entities in North Dakota are already concerned about the removal of wild horses from TRNP as they are hearing from multitudes of past and future visitors opposed to the wild horse removals. The economic impact from the reduction in tourism to the area will be significant to the surrounding communities of TRNP.
- In the Scoping meeting, Blake McCann cited a “large body of evidence and research” that livestock creates significant impacts to wildlife habitat. He is correct, but he failed to mention that the evidence and research is about cattle and sheep livestock, not horses. A 1977 report to Congress from the General Accounting Office (GAO) by the Comptroller General of the United States was titled “Public Rangelands Continue to Deteriorate.” It stated, “*The Nation’s public rangelands have been deteriorating for years and, for the most part, are not improving. Deterioration can be attributed principally to poorly managed livestock grazing.*” By contrast, wild horses have been shown to improve their habitat, as whole grass seeds are deposited in the soil from their manure. The complex four-stomach digestive system of cattle does not allow for new forage reseeding and growth.

<https://www.idausa.org/campaign/wild-animals-and-habitats/horse-protection/latest-news/wild-horses-and-burros/>

In the Scoping meeting it was noted several times that in public comments to the Scoping Notice, if other options than the provided three alternatives were needed, they should be submitted in our written comments. In reference to all the above substantiated points: **None** of the Livestock Plans three proposed Alternatives are acceptable. Therefore, I submit a fourth alternative to be included in your follow up EA:

Alternative D - Scientific Management of Horse Herd for Population and Natural Behavior

This alternative would require scientific management of the current herd of wild horses. As a native species they would be managed to protect and preserve the unique genetics and natural behaviors of this historic herd. A population objective of 150 to 200 horses would be achieved through PZP fertility control, administered and thoroughly documented with the help of trained volunteers. Those mares in the herd already rendered infertile through the experimental use of GonaCon in a prior study, and also its current use, would be allowed to remain in the Park to live out their lives with their family band members and herd mates. Under this alternative, it will not be necessary to remove and transfer any horses to other authorized entities or sold via GSA auction.

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Regarding the above proposed Alternative D, the following points should be used to support it. To achieve the population objective of Alternate D, the following actions would be implemented:

- Immediately discontinue the use of GonaCon as it severely affects the fertility of mares, often leading to their permanent infertility. In the Scoping meeting, Blake McCann said he was not aware of any horses “sterilized” by GonaCon. It is widely known from the studies conducted in TRNP that some mares became infertile after two doses and more after three doses.
- Instead of GonaCon, use the proven safe and effective fertility control PZP. Precedent for preventing wild horse population to outgrow resources in a national park has been set at Assateague Island National Seashore where the wild horses have been successfully managed using PZP for over 30 years. Staff at the Scoping meeting again claimed they could not follow the lead of Assateague Island National Seashore because TRNP’s enabling legislation would not allow it and “each park is different.” Again, this “excuse” is easy to resolve: Please use the guidance of Assateague Island National Seashore to change TRNP’s policies and protocols to allow for PZP use for wild horses in the national park.
- PZP is safe, effective, and humane. It allows stallions and mares to continue their natural behavior in family bands, protecting and caring for their band members. Visitors to the park and other wild horse herd areas do not want to see sterilized wild horses acting like domestic horses or animals in a zoo. They want to observe the excitement of wild horse family bands and interactions between the bands.
- Mr. McCann stated in the Scoping meeting that PZP is not an option because the horses have to be boosted. This argument is irrelevant due to the willingness of volunteers to administer the PZP program.

- Volunteers in the TRNP area are earnestly willing and available to carry out a PZP darting program to keep the population within the bounds of the objective. Identification and record-keeping software and databases are in use and effective in other wild herd areas using PZP. Volunteers would be trained in accordance with all requirements. The staff at TRNP would have only light oversight for the agreements and would not be responsible for the work of implementing the PZP program.
- With many of the current 200 wild horses within TRNP being infertile, the population objective of 150 - 200 horses is easily attainable and will reduce with natural attrition. It has been well accepted as fact that a wild horse herd must be at least between 150-200 animals for genetic viability. This has been established by the leading equine geneticist, Dr. E. Gus Cothran, professor emeritus at the Texas A&M School of Veterinary Medicine & Biomedical Sciences (CVM). The TRNP herd must be maintained with a population of at least 150 to 200 horses.

As a final comment to conclude: ALL the issues outlined above can be solved very simply by amending park documents and regulations to remove the designation of the horses as livestock. Once that is done, TRNP does not have to adhere to their enabling legislation and policy that does not allow for livestock in regard to the wild horses. The native species wild horses can be managed under the proposed **Alternate D**, above.

Thank you for your consideration in this matter,

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In Defense of Animals