

# Theodore Roosevelt National Park Proposed Livestock Plan

Public Comment Talking Points



## LIVESTOCK DETERMINATION

- Federal Agencies must follow federal regulations.
- Federal definition of livestock
  - 29 CFR § 780.120

*“Raising of “livestock.” The meaning of the term “livestock” . . . is confined to the ordinary use of the word and includes only domestic animals ordinarily raised or used on farms.”*
  - Food safety regulations had to be uniform across the nation for intrastate trade and sales of food.



## FERAL vs. WILD

- Feral vs. Wild is a LEGAL issue.
- Feral - Feral means having escaped or been released from domestication and reverted to a wild state and any offspring resulting therefrom. (Law Insider)
- Wild - Wild animal means any animal which is now or historically has been found in the wild, or in the wild state, within the boundaries of the United States, its territories, or possessions (Animal Welfare Act)
- Mountain States v Hodel
  - *“At the outset, it is important to note that wild horses and burros are **no less “wild” animals than are the grizzly bears that roam our national parks and forests**. Indeed, in the definitional section of the Act, Congress has explicitly declared “all unbranded and unclaimed horses and burros on public lands” to be “wild horses and burros.” 16 U.S.C. § 1332(b) (1982) (emphasis added)”*
  - *“Therefore, we agree with the district court that the subject horses are indeed “wild horses”” Wild Horse Observers Ass'n v. N.M. Livestock Bd., No. A-1-CA-37810, 14 (N.M. Ct. App. Jul. 22, 2022)*



# NATIVE vs. NON-NATIVE (INVASIVE)

- Native vs. Non-native is a SCIENTIFIC issue.
- Equid evolved here on the N. American continent & nowhere else for over 55 millions years.
- The claim that our wild horses are non-native/invasive is based on a THEORY that the horses went extinct on this continent and were brought BACK by Spanish Conquistadors.
  - IF this theory was true being brought BACK would mean they are at a minimum a reintroduced native species.
- Science is constantly proving that modern horse equus caballus is the same horse that is theorized to have crossed the Bering Land Bridge and spread throughout Eurasia then going extinct on this continent.
- Equus caballus being the modern horse that is here, whether in the wild or in a barn, and being the same horse that is theorized to have gone extinct on this continent means that they are in fact native here.
- Archaeological & historical evidence along with Ancient DNA from fossils disprove the theory.



Angie Richman, TRNP Superintendent:

*“...the purpose statement for Theodore Roosevelt National Park states that the park was established to pay tribute to the conservation legacy of Theodore Roosevelt...”*

- Animals living on the Park acreage when Theodore Roosevelt visited
  - Large herbivore species included mule deer, white-tailed deer, wild horses, Audubon bighorn sheep (became extinct in 1905)
- Animals living on the Park acreage when the Park was established in 1947
  - Large herbivores mule and white-tailed deer and wild horses
- Animals living on the Park acreage today (large herbivore species)
  - Mule and white-tailed deer there since before Theodore Roosevelt visited or the Park was created
  - Pronghorn antelope were introduced in 1951
  - A different species, Rocky Mountain, bighorn sheep was first reintroduced in 1954
  - Bison were reintroduced in 1956
  - Elk were introduced in 1985



## National Park Service Organic Act

*“The service thus established shall promote and regulate the use of the Federal areas known as national parks... as conform to the fundamental purpose of the said parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”*

If the NPS had or is going to follow this Act then the wild life therein, that they were mandated to conserve would be that wildlife that existed when the Park was created in 1947.

Again, that large herbivore wildlife would include only mule deer, white-tailed deer and wild horses.

Adding other large herbivores such as elk and pronghorn and reintroducing bison, and a different species of bighorn sheep, was not conserving the natural scenery or wild life that were therein at the time. (This is designing a “game” park rather than a natural “historic/memorial” park.)

Additionally, if the Park was managing for a balanced ecosystem, they would have also reintroduced apex predator species such as the wolf and grizzly. This however was not done, perhaps because they are not “game” or meat animals. The only apex predator that is known to occasionally travel through the Park is the mountain lion, likely due to the Park being fenced.



## CLIMATE CHANGE

The proposed plan, according to the NPS, would “*Provide resiliency for native ecosystems and species in the face of a changing climate.*”

- NPS must compare methane emissions of horses (hindgut fermenters) versus ruminants (bison, bighorn sheep, cervids)
  - Methane contributes to climate change, which is worse than carbon dioxide in respect to Earth’s warming
  - In this country 55% of methane emissions are from ruminants (Dr. Mike Hudak)
- NPS needs to compare carbon sequestration & release by species
  - Carbon sequestration is when carbon is stored underground
  - Carbon dioxide reduces the ability for the Earth to cool itself
  - Approximately 80% of the livestock sector emissions of CO2 come from ruminants (United Nations data)
  - horses produce 3.3 times less than ruminants



## HORSES CONTRIBUTE TO A HEALTHY ENVIRONMENT

- The NPS should give consideration of horses used for rewilding across Europe and Asia because they increase the biodiversity of an ecosystem and create a symbiotic relationship with other species.
- Horses can decrease the vegetation that increases fuels for wildfires
- Horses act as seed dispersers and their feces is excellent fertilizer
- Horses graze in a mosaic pattern of short and tall grasses. This contributes to the structural diversity of grasses and helps leave cover for other animals such as deer, ground nesting birds, rabbits, etc.
- Horses because they have both upper and lower teeth act more like a lawn mower which encourages continuing growth of the grasses and forbs.
  - Bison only have lower teeth, tending to pull plants out by the root
  - Bighorn sheep, have upper and lower, but are also known to pull plants out by the root, or trim it down to the root damaging the plant so badly that it discourages regrowth
- Horses do not eat woody plants, such as saplings on riparian areas
  - Bison, deer, and elk will eat these woody plants
- Horses do not hang out at a water source
  - Bison are known to hangout at and poop in water sources polluting the water
  - Bison also do significantly more damage to streambanks because of their weight and their split-toed hooves



## CULTURAL & HISTORICAL SIGNIFICANCE OF THE HERD

- These horses are descended from Chief Sitting Bull's war horses. The Hunkpapa called them blue warhorses.
  - This was well documented in the work done by Dr. Castle McLaughlin, a historian for the NPS, and previous NPS historian Robert Utley agreed with her findings. The NPS ignored these findings.
  - The NPS has not preserved the bones and fossils from equids found in archaeological digs, but demands DNA proof of the indigenous connection to the herd.
  - Brothers Leo and Frank Kuntz have attempted to preserve this unique bloodline by purchasing as many members of the herd as they can after they were rounded up and removed in previous years.
  - The NPS attempted to wash out the genetics (blue roan phenotype) by introducing arabians and quarter horses stating they wanted to create larger horses that would be more desirable at sales and auctions.
  - Their attempts have failed because many of the herd members that are still their today carry the blue roan phenotype.



## ECONOMIC & TOURISM IMPACTS

### TRNP Visits by Year

2017	708,003
2018	749,389
2019	691,658
2020	551,303
2021	796,085

The town of Medora relies heavily on the Park and tourism. According to the 2016 report, most park visitor spending was for:

- lodging (31.2 percent)
- food and beverages (27.2 percent)
- gas and oil (11.7 percent)
- admissions and fees (10.2 percent)
- souvenirs and other expenses (9.7 percent)
- local transportation (7.4 percent)
- and camping fees (2.5 percent)

*“Medora, North Dakota maintains the charms of the "old" days and shares them with thousands of visitors each year. Its quaint downtown area offers shopping, touring, eating and stagecoach rides but most importantly it is the gateway to the South Unit of Theodore Roosevelt National Park.”* -Everyyear Travel & Leisure Magazine



## **PUBLICLY FUNDED RESEARCH EXPERIMENT**

The NPS in cooperation with the BLM and Colorado State University did a research experiment using a fertility control vaccine, GonaCon, on this herd.

- The experiment began in 2009
- The experiment allegedly ended in 2019
- The BLM and NPS claim this is complete...finished...done
- NO FINAL STUDY REPORT HAS BEEN PUBLISHED
  - There are reports done about the experiments, some reports that are not peer-reviewed on initial findings, and claims of final conclusions



We have sent FOIA (public records) requests for the studies that were submitted to the EPA to approve and register GonaCon

- We submitted our FOIA in April 2022
- The EPA has stalled using every possible excuse there legally is, and their new date for completion of our request is February of 2023

BLM and FS are using GonaCon now claiming this study was done and proves GonaCon is safe, while also admitting it sterilizes horses.

Studies done outside the US show that GonaCon sterilizes not only horses but also animals (including humans) who consume the flesh of a treated horse.

**WE BELIEVE THIS HERD IS BEING REMOVED SO THE PUBLIC DOES NOT LEARN THEY HAVE BEEN STERILIZED**

