

February 19, 2024

Director Charles Sams  
National Park Service  
Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

**RE:** Wild Horses at Theodore Roosevelt National Park

Dear Director Sams:

The NPS's management recommendations for wild horse management at Theodore Roosevelt National Park (TRNP) are rightly coming under close scrutiny from both scientists and the public, especially the people of North Dakota. We want to underscore the bases for these well-grounded objections and urge the NPS to protect the wild horses at the unit and heed the groundswell of concerns about its September 2023 Livestock Plan Environmental Assessment. The agency's proposed actions involve inhumane and unwarranted helicopter roundups and auctions of the historic and beloved horses. Two of the proposals to remove horses permanently are especially overreaching and show a level of disregard, even contempt, for public opinion.

The NPS has curiously characterized the horses at TRNP as "livestock," explaining further on the NPS website that "[l]ivestock means any species of animal that has been selectively bred by humans for domestic and agricultural purposes including but not limited to cattle, sheep, horses, burros, mules, goats and swine."<sup>1</sup> This is a poorly considered and overly broad definition. Under that definition, bison may also be considered "livestock," because the species, nearly extirpated from the United States in the 19<sup>th</sup> century, was at some point and in some places "selectively bred by humans."<sup>2</sup> Yet TRNP consistently and frequently refers to bison as 'wildlife.'<sup>3</sup>

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<sup>1</sup> *Frequently Asked Questions About Horses*, Theodore Roosevelt National Park, <https://www.nps.gov/thro/learn/nature/frequently-asked-questions-about-horses.htm> (last visited Feb. 13, 2024).

<sup>2</sup> See, e.g., Matthew Wills, *Where the Bison Roam—Again?*, JSTOR Daily, <https://daily.jstor.org/where-the-bison-roam-again/> (March 28, 2020).

<sup>3</sup> E.g. *Wildlife Viewing - North Unit*, TRNP, NPS, <https://www.nps.gov/thingstodo/wildlife-viewing-north-unit.htm#:~:text=The%20North%20Unit%20of%20Theodore%20Roosevelt%20National%20Park%20is%20a,%2C%20mountain%20lions%2C%20and%20more> (last visited Feb. 13, 2024).

More importantly, the free-roaming horses at TRNP have been a cultural and ecological inhabitant of this region for generations. These animals are descendants of largely free-roaming domesticated animals who held enormous economic and cultural value for native people and European settlers alike. To classify them as “livestock” to rationalize their removal is antithetical not only to science but also to the agency’s broad mission to preserve natural and cultural resources, land, and heritages for future generations. The term also fails to recognize the complex, reciprocal, and longstanding relationship between these horses, their environment, and humans, and it reinforces the false dichotomy between “non-wild” and “wild[erness]” that you yourself have rightfully criticized as an overly simplistic and colonial construct imposed on our nation’s lands.<sup>4</sup>

The NPS publicly states that it builds and pursues policy based on the best available science. Science shows that all modern wild horse bloodlines can be traced back to the Eurasian “continent,” where domestication took place approximately 6,000 years ago – but that is only one dimension of a much more complex ecological and human settlement story.

According to Dr. Ross MacPhee, the Director of Science at Rewilding America Now and an emeritus Curator of Vertebrate Zoology at the American Museum of Natural History, modern domesticated horses descend from a uniquely North American branch of equids, the caballoids. Caballoids were endowed by nature to act as keystone species within grassland ecosystems, and along with bison and mammoths, they kept our ecosystems diverse and productive for millions of years. These large-bodied, bulk-feeding mammals are critically important for maintaining or improving grassland health, and that so-called “invasives” like these horses have the same combinations of ecologically beneficial behaviors as the removed or depleted native species.<sup>5</sup> The reduction in grassland habitats is, in part, a derivative of this loss of these large-bodied, bulk-feeding mammals. Free-roaming horses are ideal animals to promote regeneration of grassland ecosystems, and they are welcomed by the communities adjacent to TRNP, so they are accepted when one takes into account the “cultural carrying capacity.”

In contrast to horses, cattle’s effects on grassland ecosystems are not so benign or beneficial. Because cattle have been highly selected by humans for size rather than mobility and nimbleness, they do not migrate in the way that other large native herbivores do; as a behavioral matter, they threaten to overgraze the land where they are pastured. Free-ranging horses, on the other hand, move as needed and are gifted with fleetness and an instinct to move and avoid predators. Thus, unlike cattle, these free-roaming horses can act as ecosystem engineers and distribute

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<sup>4</sup> From dominance to stewardship: Chuck Sams’ Indigenous approach to the NPS, High County News, <https://www.hcn.org/issues/54-11/indigenous-affairs-national-park-service-from-dominance-to-stewardship-chuck-sams-indigenous-approach-to-the-nps/> (Nov. 1, 2022).

<sup>5</sup> EJ Lundgren et al., *Functional traits—not nativeness—shape the effects of large mammalian herbivores on plant communities*, 383 *Science* 531-537 (2024).

seeds of native plants across terrain types, without denuding native grasses or eroding soil.

“Removing wild horses from TRNP is a grave mistake for many reasons, but depriving the park of one of its last natural megafaunal engineers is among the least forward-thinking of the ideas now being considered for the park’s future direction,” Dr. MacPhee emphasized.

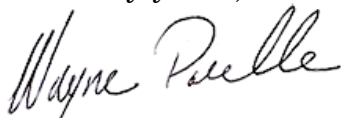
You have also heard from many political leaders, business leaders in gateway communities, and other North Dakotans about the economic value of the herd. The NPS action would bring hardship to the town of Medora and other communities that depend on the appeal of TRNP’s horses.

Why is it acceptable for the NPS to value and preserve so many historical aspects of our culture – from historic battlefields and buildings, to the protection of revered tribal artifacts, to the preservation of important or sacred monuments – but then dispense with that ethic when it comes to rural landscapes and the animals who’ve long played a central role in the dynamic between humans and ecosystems they inhabited?

The NPS can readily and humanely manage the population of horses if there is some ecological imperative to do so, even though there’s so evidence of any present problem. The agency has decades of experience in managing free-roaming horses, such as at the Assateague Island National Seashore. TRNP is a contained area, making the application of fertility control practical. As long as the horse population is not exploited, it can be readily managed by fertility-control vaccines that are safe and effective and delivered by human shooters.

The NPS should reassess its policies when it comes to native/non-native species concerns and consider the emerging sciences of grassland ecology and restorative ecology in the West. It should heed the views of North Dakotans asking for a more nuanced NPS philosophy in managing TRNP. And it should embrace modern thinking in contemporary wildlife management instead of decades-old management frameworks that call for the removal of animals whose place on the landscape is widely treasured by the American public.

Sincerely yours,



Wayne Pacelle  
President  
Animal Wellness Action

Kate Schultz  
Senior Attorney  
Center for a Humane Economy