PUBLIC COMMENT
SUMMARY REPORT

Theodore Roosevelt National Park

Livestock Plan

February 2024

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TABLES

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ACRONYMS AND ABBREVIATIONS   Full Phrase

CEQ	Council on Environmental Quality
EA	Environmental Assessment
GSA	United States General Services Administration
NEPA	National Environmental Policy Act
NPS	National Park Service
PEPC	Planning, Environment, and Public Comment
PZP	Porcine Zona Pellucida (contraceptive)
the Park	Theodore Roosevelt National Park

Chapter 1.
Introduction

This report documents the results of the Livestock Plan Environmental Assessment (EA) comment period. The EA was available for public review from September 25, 2023, to November 24, 2023.

1.1   THE EA COMMENT PERIOD PROCESS SUMMARY

On September 25, 2023, the National Park Service (NPS) published the EA on the project website: https://parkplanning.nps.gov/projectHome.cfm?projectId=105110. On October 10, 2023, the NPS held a virtual public meeting to present information on the proposed project and answer questions posed by the public. The NPS invited members of the public to submit comments on the EA electronically through the NPS Planning, Environment, and Public Comment (PEPC) website.

1.2   NATURE OF COMMENTS RECEIVED

The NPS received 25,561 total correspondences; of these, 9,118 correspondences were unique, and 16,443 were identified as part of form-letter campaigns.[1]

1.3   THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to identify and compile public comments into a format that can be used by decision-makers and the National Environmental Policy Act (NEPA) team. Comment analysis assists the team in identifying substantive issues raised by the public that require clarifying during the NEPA process.

The comment analysis process includes five main components:

- Employing a correspondence database for comment identification and management
- Developing a coding structure
- Reading correspondences and coding public comments
- Interpreting and analyzing the comments to identify concern statements
- Preparing responses to substantive comments

The NPS developed a coding structure to help sort comments into logical groups by topics and issues. The coding structure was derived based on the range of topics identified during preliminary NPS review of correspondences, past planning documents, and the issues known to the NPS planning team as well as issues identified during civic engagement and scoping. The

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[1] Form-letter campaigns use a standardized correspondence letter that is generally initiated by nongovernment advocacy groups. Form letters are those with identical or nearly identical text. For the purposes of this report, a master form letter was identified by NPS analysts and reviewed for any substantive comments. Correspondences identical to the master form letter were not analyzed.

structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS used its PEPC database to manage the correspondences and comments. The database stores the full text of all correspondence and allows comments within the correspondence to be coded by topic and/or issue. Some outputs from the database include tallies of the total number of correspondences, unique correspondences, form letters, comments by a particular topic or issue, and limited demographic information regarding the source of the correspondence.

The analysis of the public comments involved assigning codes to statements made in submitted correspondences. The NPS read and analyzed all correspondence, including those of a technical nature; those expressing opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report is just one part of the process of gathering internal and external input. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the comment's content rather than the number of times a comment was received. This report is intended to be a summary of the comments received rather than a statistical analysis.

1.4   DEFINITION OF TERMS

Primary terms used in this document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, or a comment submitted online using the NPS PEPC website. Each piece of correspondence is assigned a unique identification number in the PEPC system.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include an expression of support or opposition to the use of a potential management tool with rationale, or additional data regarding an existing condition.

Code: A code is the grouping centered on a common subject. The NPS developed the codes during the content analysis process and uses the codes to track major subjects throughout the EA process.

Concern statement: A concern statement is a written summary of all public comments received under a particular code. Some codes were further separated into several concern statements to provide a better focus on the content of the comments.

1.5   METHODOLOGY

Correspondences that were duplicative or substantially identical were analyzed as one unique submission. The NPS read each correspondence and identified specific comments within each correspondence.

The NPS gave each comment a code to identify the comment's general content and to group similar comments together. Twenty-one codes were used to categorize the comments received. An example of a code developed for this project is *Preliminary Alternative A: No Action*. This code relates to any comments received regarding the no-action alternative. In some cases, the same comment may have overlapping issues within the same statement; in this case, a single comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea. Under each code, the NPS grouped comments by similar themes, and those groups were summarized with a concern statement or multiple concern statements.

Chapter 2.
Correspondence Summary

The following tables show the distribution of correspondences by how they were coded. Of the 21 codes used, the 17 codes shown in Table 2-1 contained substantive comments for which concern statements were developed; concern statements by code are presented in Chapter 3.

Table 2-1
Comment Distribution by Code

Code Description	Number of Comments
Preliminary Alternative A: No Action	157
Preliminary Alternative B: Expedited Reduction to No Livestock	19
Preliminary Alternative C: Phased Reduction to No Livestock	12
New Alternative Proposed	135
Purpose and Need: Planning Process and Policy	32
Purpose and Need: Park Purpose and Significance	304
Purpose and Need: NEPA and CEQ (Council on Environmental Quality)	133
Purpose and Need: Interpretation of Park Policies, Regulations, Laws	29
Issues: Cultural resources	190
Issues: Park management	359
Issues: Visitor use or experience	171
Issues: Livestock, Horses	443
Issues: Livestock, Cattle	32
Issues: Socioeconomics	254
Issues: Vegetation	94
Issues: Wildlife/Special Status Species	71
Issues: Water Resources	4

Demographics by state of the correspondences received are shown in Table 2-2. It should be noted that most correspondences received were related to form letter campaigns and were identified as originating from Alabama. This is likely an artifact of the letter submission to PEPC during which the state was not properly designated.

Table 2-2
Correspondence Distribution by State

State	Number of Correspondences
Alabama	15,114
North Dakota	1,377
California	859
Minnesota	742
Florida	470

State	Number of Correspondences
New York	415
Texas	405
Washington	342
Pennsylvania	321
Colorado	320
Wisconsin	306
Illinois	300
Ohio	286
Michigan	278
Arizona	273
Oregon	230
North Carolina	227
Massachusetts	203
Montana	187
Virginia	163
Missouri	154
Georgia	149
New Jersey	141
Indiana	139
Tennessee	133
Iowa	121
Maryland	117
Nevada	109
South Dakota	93
Kansas	93
Kentucky	90
South Carolina	88
Connecticut	87
New Mexico	73
Maine	69
Arkansas	66
New Hampshire	64
Idaho	57
Utah	56
Oklahoma	54
Wyoming	50
Louisianna	43
Nebraska	38
Mississippi	38
Vermont	35
West Virginia	35

State	Number of Correspondences
Rhode Island	35
Alaska	29
Delaware	24
Hawaii	21
District of Columbia	20
Total	25,139

As shown in Table 2-3, the majority of the comments received were from unaffiliated individuals. Several unaffiliated individuals identified nongovernment organizations with which they are associated; state government and nongovernmental organizations are listed in Table 2-4.

Table 2-3
Correspondence by Organization Type

	Number of Correspondences
State government	2
Nongovernmental	57
Unaffiliated individual	25,502
Total	25,561

Table 2-4
Organizations Represented in Correspondences

Organization Name	Organization Type
Advocates for Wild Equine	Nongovernmental
Alaska Sportsman's Lodge	Nongovernmental
American Wild Horse Campaign	Nongovernmental
AMVETS	Nongovernmental
Andean Tapir Fund	Nongovernmental
Angle of Repose Photography	Nongovernmental
Animal Welfare Institute	Nongovernmental
Central Oregon Wild Horse Coalition	Nongovernmental
Classic Bloodstock	Nongovernmental
Coldwell Banker Realty	Nongovernmental
Cowboy's Honor Ride	Nongovernmental
Dakota Grown Photos	Nongovernmental
Desert Springs Equestrian Center	Nongovernmental
Dream Weaver Nokotas	Nongovernmental
EASearch, LLC	Nongovernmental
Essential Massage	Nongovernmental
Friends of Animals	Nongovernmental

Organization Name	Organization Type
Gin Lot Farms, LLC	Nongovernmental
Jarrin Production Services, LLC	Nongovernmental
Jeanine's Happy Diner	Nongovernmental
Kathleen Cencula Wildlife Art	Nongovernmental
Lewis and Clark Trail Museum	Nongovernmental
Loven Oven Pizzeria	Nongovernmental
Medicare Health Insurance	Nongovernmental
Milton Mobile Animal Care	Nongovernmental
Moehaven Farm	Nongovernmental
MultiCare Good Samaritan Hospital	Nongovernmental
National Mustang and Wild Horse Assessment and Protection Associates	Nongovernmental
New Beginnings Ranch	Nongovernmental
North Dakota Badlands Horse	Nongovernmental
North Dakota Department of Commerce – Tourism Division	State
North Dakota Parks and Recreation	State
OMNI Center for Peace, Justice, and Ecology	Nongovernmental
Oregon Wild Horse Organization	Nongovernmental
PA 4H	Nongovernmental
Preservingamericanwildlife.org	Nongovernmental
Public Interest Coalition	Nongovernmental
Red River Water Warriors	Nongovernmental
Rising Stars Equine Therapy	Nongovernmental
Rockin D	Nongovernmental
Salt River Wild Horses	Nongovernmental
Save Our Wild Horses	Nongovernmental
Sky Dog Sanctuary	Nongovernmental
St. Jude, American Society for the Prevention of Cruelty to Animals, Animal Rescue New Orleans	Nongovernmental
Steve Hostetler Photography	Nongovernmental
Sunrise Equine Rescue	Nongovernmental
Sweet Serenity Sanctuary	Nongovernmental
The Cloud Foundation	Nongovernmental
The Coalition to Protect America's National Parks	Nongovernmental
This Old Horse (a.k.a. Wishbone Ranch)	Nongovernmental
Todorhaus German Shepherds	Nongovernmental
Tori Gagne Photography	Nongovernmental
Trish Stevenson Fine Art	Nongovernmental
United Healthcare	Nongovernmental
Wild in North Dakota	Nongovernmental
Wild Lands Wild Horses Fund Corp	Nongovernmental
Wynkoop Insurance Agency, LLC	Nongovernmental
Wild Lands, Wild Horses	Nongovernmental
Wyoming Mustang Institute	Nongovernmental

Chapter 3.
Comment Summary

3.1   CODE—PRELIMINARY ALTERNATIVE A: NO ACTION

Concern Statement: Some commenters stated that Alternative A is preferable because it would maintain the horse herd and noted the herd attracts some visitors to the Park.

3.2   CODE—PRELIMINARY ALTERNATIVE B: EXPEDITED REDUCTION TO NO LIVESTOCK

Concern Statement: Some commenters stated that Alternative B is preferable because domestic livestock do not belong in the Park and are resource-intensive, non-native species that often outcompete native plant and animal species.

3.3   CODE—PRELIMINARY ALTERNATIVE C: PHASED REDUCTION TO NO LIVESTOCK

Concern Statement: Some commenters stated that Alternative C is preferable not only because it would protect natural resources, but also because phased reduction over time seems to be the most humane option.

3.4   CODE—NEW ALTERNATIVE PROPOSED

Concern Statement: Some commenters suggested that the Park develop a larger herd that is managed for genetic viability.

Concern Statement: A few commenters suggested that the horses should be allowed to remain in the Park with as little intervention as possible to remain consistent with biological life cycles.

Concern Statement: Several commenters recommended that the Park pursue alternative sources of funding and support for managing horses at the Park and consider employing the cooperation of private and public entities.

3.5   CODE—PURPOSE AND NEED: PLANNING PROCESS AND POLICY

Concern Statement: Commenters stated that the NPS has not provided adequate evidence of the impacts of horses on the landscape and wildlife, as well as their impact on the Park's budget.

Concern Statement: Some commenters suggested that if the horses are removed, they should be adopted and not auctioned.

3.6   CODE—PURPOSE AND NEED: PARK PURPOSE AND SIGNIFICANCE

Concern Statement: Some commenters felt that because horses were a part of Theodore Roosevelt's experience during his time in and around what is now the Park, managing horses is part of the Park's purpose and significance.

Concern Statement: A few commenters stated that the NPS should not allow for the presence of non-native species, such as livestock, in the Park because it is inconsistent with the emphasis on native ecosystems and is not aligned with Theodore Roosevelt's conservation philosophy.

3.7   CODE—PURPOSE AND NEED: NEPA AND CEQ

Concern Statement: A few commenters suggested that an environmental impact statement should be prepared due to the controversial nature of the project.

Concern Statement: Some commenters suggested that the purpose and need statement in the EA is too narrow and the EA did not address a reasonable range of alternatives.

3.8   CODE—PURPOSE AND NEED: INTERPRETATION OF PARK POLICIES, REGULATIONS, LAWS

Concern Statement: Several commenters argued that the horses should be recognized as native wildlife, not livestock, for the following reasons: horses at Theodore Roosevelt National Park are not domesticated animals raised in an agricultural setting for economic profit; the horse herd does not receive water, feed, or shelter, unlike the longhorn cattle; and horses at Assateague Island National Seashore are referred to as wildlife and so the difference between the horses in NPS units should be articulated. Commenters suggested classifying horses as livestock deprives them of certain important protections afforded to wildlife.

Concern Statement: Several commenters thought the Wild and Free-Roaming Horses and Burros Act of 1971 applied to NPS lands and the horses at the Park.
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3.9   CODE—ISSUES: CULTURAL RESOURCES

Concern Statement: Several commenters stated that horses are an integral part of the historical and cultural heritage of the North Dakota Badlands.

3.10   CODE—ISSUES: PARK MANAGEMENT

Concern Statement: Some commenters suggested that current Park management practices, including roundups and the GSA adoption program, are inhumane and subject horses to unnecessary stress.

3.11   CODE—ISSUES: VISITOR USE OR EXPERIENCE

Concern Statement: Commenters felt that reducing the number of horses or removing them altogether from the Park would degrade the visitor experience and noted they believe they are a primary reason that many people visit the Park.

3.12 CODE—ISSUES: LIVESTOCK, HORSES

Concern Statement: Commenters suggested that the NPS should use PZP contraceptive instead of GonaCon due to concerns regarding short-term and long-term physiological impacts, such as site of injection injury or sterilization.

3.13 CODE—ISSUES: LIVESTOCK, CATTLE

Concern Statement: Some commenters stated that in addition to Mycoplasma bovis, cattle can introduce other diseases.

Concern Statement: Some commenters said that cattle cause harm to the environment, and grazing does not belong on public lands.

3.14 CODE—ISSUES: SOCIOECONOMICS

Concern Statement: Many commenters felt the NPS should consider the tourism draw and economic benefits to the area and local communities provided by the horse herd. They felt the removal of the herd would impact the economy and reduce Park visitation.

Concern Statement: A few commenters suggested that the NPS should reconsider using helicopters for conservation practices due to cost.

3.15 CODE—ISSUES: VEGETATION

Concern Statement: Some commenters suggested that the removal of horses and cattle would allow for native plant communities to recover.

Concern Statement: Some commenters questioned the ability to distinguish impacts on vegetation between the horses and other species in the Park.

3.16 CODE—ISSUES: WILDLIFE/SPECIAL STATUS SPECIES

Concern Statement: Some commenters suggested that horses are part of the native ecosystem and suggested their presence benefits native species.

Concern Statement: Some commenters questioned why wildlife, such as mule deer, pronghorn, elk, and bison, some of which are reintroduced to the landscape, are not managed in the same manner as horses.

Concern Statement: Some commenters stated that the NPS has an obligation to preserve the natural conditions within the Park's boundary, including management and removal of nonnative livestock.

3.17   CODE—ISSUES: WATER RESOURCES

Concern Statement: Some commenters stated that livestock have impacts on water resources, including the degradation of water quality, fisheries, and riparian areas, and contribute to E. coli contamination.

Concern Statement: Some commenters stated that horses do not have a distinguishable impact on water resources when compared to other ungulates or actually benefit other species by breaking ice and exposing food and water that are otherwise inaccessible.