

June 3, 2013

Re: H.R. 126 – the Corolla Wild Horse Protection Act

Dear Honorable Member of Congress

We, the undersigned scientific and wildlife conservation organizations, have serious concerns about H.R. 126, the Corolla Wild Horses Protection Act, and urge the Congress to oppose its passage. The Corolla Wild Horses Protection Act would force the U.S. Fish and Wildlife Service (FWS) into a mandatory agreement to manage for non-native horses on the Currituck National Wildlife Refuge (NWR) on the Outer Banks of North Carolina. This management agreement would come at the expense of native American wildlife (and plants) such as endangered loggerhead sea turtles and endangered shore birds such as the piping plover, both of which need the refuge's beach habitat for their nests.

The National Wildlife Refuge System Administration Act, passed by Congress in 1966, provides clear intent for the FWS to, “*provide for the conservation, protection, and propagation of native species of fish and wildlife*” and the Refuge Improvement Act, passed by Congress in 1997 goes further to say these refuges should be managed as a system, to “*administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.*” The passage of this bill would put the FWS in an impossible position of being legislatively required under the Refuge Administration Act and Refuge Improvement Act to manage for the conservation of native American wildlife, while supporting a nonnative species at the same time.

Non-native species are among the most widespread and serious threats to the integrity of native wildlife populations because of their potential to invade and degrade native ecosystems. These species present special challenges for wildlife managers because their impacts on the native biota are poorly understood by the general public, and many people erroneously regard them as a component of the natural ecosystem. Non-native horses that roam freely along the Atlantic coast of the U.S. are an example of such species. They are iconic and much-loved by some, but damage wildlife habitat, are not managed like native wildlife, and require focused, sustained, and expensive management at the expense of native wildlife.

While perhaps hard to imagine, why would mandating the FWS to manage non-native horses be any different than to mandate that the FWS manage for non-native Burmese pythons in Florida? We, as supporters of native American wildlife, must speak out for the endangered and threatened sea turtles and migratory birds that would be adversely impacted by such a bill.

Specifically, we are concerned that H.R. 306 would:

- Require FWS to enter into an agreement with the Corolla Wild Horse Fund to provide for management of feral horses in and around the Currituck National Wildlife Refuge and further maintain a herd of not less than 110 horses. It is not appropriate for Congress to dictate the management of each individual parcel of public land and opens the door for mismanagement.

RECOMMENDATION: The FWS should not manage a non-native species as a trust species; instead, the ownership of the horses themselves should be turned over to the Corolla Wild Horse Fund. This would be similar to how horses are managed on the Chincoteague National Wildlife Refuge in Virginia by the Chincoteague Fire Department, not by the FWS. The herd number should not be above the 60 agreed upon in the current agreement, the Currituck Outer Banks Wild Horse Management Plan, but should even 60 prove harmful to native wildlife and plants, the FWS should have the authority to have the number lowered.

- Override the Refuge System Administration Act and Refuge System Improvement Act by effectively changing the purpose for which the refuge was established and does not consider the Currituck NWR's Comprehensive Conservation Plan (CCP), which was created with public involvement. Further, this bill would require management for non-native species, leaving the System vulnerable to these adjustments at other refuges. Other refuges we know could be impacted include the Hart and Sheldon NWRs in Nevada, Vieques NWR in the Virgin Islands and some refuges in Alaska.

RECOMMENDATION: Retain the original purpose of the refuge and incorporate the refuge's CCP into any agreement with the Corolla Wild Horse Fund.

In May of 2012 when this bill (H.R. 306) was proposed for passage in the previous Congress, 57 organizations voiced their concerns through a single letter to the Senate Environment and Public Works Committee. We have attached that list of signatories for your reference. We thank you for considering our concerns and recommendations and we hope you will work to protect America's unique native wildlife and plants for future generations.

Sincerely,  
Winifred Kessler, President  
The Wildlife Society  
Bethesda, MD

David Houghton, President  
National Wildlife Refuge Association  
Washington, DC

Miles Moretti, President  
Mule Deer Foundation  
Salt Lake City, UT

Jim Lyon, Vice President for Conservation Policy  
National Wildlife Federation  
Washington, DC

Wally Butler, President  
Society for Range Management  
Littleton, CO

M. David Allen, President/CEO  
Rocky Mountain Elk Foundation  
Missoula, MT

Lt. Col. Dennis J. Foster (US Army, ret.),  
Executive Director  
Masters of Foxhounds Association  
Berryville, VA

Melissa Simpson, Director of Government Affairs  
and Science Based Conservation  
Safari Club International  
Washington, DC

John Larson, Chief Executive Officer  
National Association of Conservation Districts  
Washington, DC

Signatories from the 1 May 2012 letter to Chairwoman Barbara Boxer and Ranking Member Inhofe, Environment and Public Works Committee:

Michael Hutchins, Executive Director/CEO  
The Wildlife Society  
Bethesda, MD

Evan Hirsche, President  
National Wildlife Refuge Association  
Washington, D.C.

Don Barry, Executive Vice President  
Defenders of Wildlife  
Washington, D.C.

Steve Williams, President  
Wildlife Management Institute  
Gardners, PA

Jim Lyon, Vice President for Conservation Policy  
National Wildlife Federation  
Washington, DC

Ronald Fowler, President  
Blue Goose Alliance  
Albuquerque, NM

Ben Wallace, President  
Boone and Crockett Club  
Missoula, MT

Jimmy Bullock, Board Member  
Catch-A-Dream Foundation  
Mississippi State, MS

Dale Hall, Chief Executive Officer  
Ducks Unlimited  
Memphis, TN

Eric Nuse, Executive Director  
Quality Deer Management Association  
Bogart, GA

John L. Devney, Senior Director – U.S. Policy  
Delta Waterfowl Foundation  
Bismarck, ND

Brian Bachman, President/CEO  
North American Bear Foundation  
Pillager, MN

Mitch King, Director of Government Relations  
Archery Trade Association  
Helena, MT

Mike Schlegel  
Pope and Young Club  
Chatfield, MN

James Earl Kennamer, Ph.D., Chief Conservation  
Officer  
National Wild Turkey Federation  
Edgefield, SC

Tom Allen, Board of Directors  
Public Lands Foundation  
Arlington, VA

Douglas Grann, President/CEO  
Wildlife Forever  
Brooklyn Center, MN

M. David Allen, President/CEO  
Rocky Mountain Elk Foundation  
Missoula, MT

Jess Peterson, Executive Vice President  
Society for Range Management  
Wheat Ridge, CO

Ben F. Carter, Executive Director  
Dallas Safari Club  
Dallas, TX

Gray N. Thornton, President/CEO  
Wild Sheep Foundation  
Cody, WY

Lt. Col. Dennis J. Foster (US Army, ret.),  
Executive Director  
Masters of Foxhounds Association  
Berryville, VA

Mark D. Smith, Ph.D., President  
Alabama Chapter  
The Wildlife Society

Scott C. Williams, Treasurer  
Northeast Section  
The Wildlife Society

Nicki Frey, President  
Central Mountains and Plains Section  
The Wildlife Society

Brad Carner, President  
Arkansas Chapter  
The Wildlife Society

Jon Klimstra, President  
Maryland/Delaware Chapter  
The Wildlife Society

Shawn Cleveland, President  
Montana Chapter  
The Wildlife Society

Tim Gestwicki, Executive Director  
North Carolina Wildlife Federation  
Charlotte, NC

Jim Nosler, Vice President  
Friends of Balcones Canyonlands NWR  
Marble Falls, TX

Marilyn Emerson, President  
Friends of Crane Meadows NWR, Inc.  
Little Falls, MN

James L. Green, Government Relations  
Committee  
Friends of Crystal River NWR  
Crystal River, FL

Grenville Whitman, President  
Friends of Eastern Neck NWR, Inc.  
Rock Hall, MD

Edgar C. Bristow, Board  
Friends of Forsythe NWR  
Absecon, NJ

Nancy Meister, Board  
Friends of the Kofa NWR  
Yuma, AZ

Joan Stephens, Past President  
Friends of the Lower Suwannee and Cedar Keys  
Refuge  
Trenton, FL

Thomas Goettel, Treasurer  
Friends of Maine's Seabird Island NWR  
Rockland, ME

Richard N. Thieke, Chairman  
Friends of the National wildlife Refuges of RI  
Charlestown, RI

Joseph P. Zebrowski, President  
Friends of Las Vegas NWR  
Las Vegas, NV

Daniel Johnson, Board  
Friends of Mackay Island NWR  
Knotts Island, NC

Gina Johnson, Member  
Friends of Mackay Island NWR  
Knotts Island, NC

David Govatski, President  
Friends of Pondicherry NWR  
Jefferson, NH

Joan Patterson, President  
Friends of the Potomac River Refuges  
Woodbridge, VA

Tom Prall, Vice President  
Friends of the Prairie Learning Center – Neal  
Smith NWR  
Prairie City, IA

Allyn Schneider, Vice President  
Friends of the Savannah Coastal Refuges  
Hilton Head Island, SC

Barbara Howard, President  
Friends of the Tampa Bay National Wildlife  
Refuges, Inc.  
St. Petersburg, FL

Elizabeth Siegel, Board  
Friends of Alaska National Wildlife Refuges  
Homer, AK

Gary Ivey, President  
Malheur Wildlife Associates  
Princeton, OR

Molly P. Brown, President  
Friends of Back Bay NWR  
Virginia Beach, VA

Cheryl Petticrew, Secretary/Treasurer  
Friends of Back Bay  
Virginia Beach, VA

Kristen Beck, President  
Pelican Island Preservation Society  
Sebastian, FL

Nancy J. Curry  
Retired Wildlife Refuge Manager  
Cheney, WA

Peggy Waterfield  
Friends of Mackay Island  
Knotts Island, NC