

May 1, 2012

Chairwoman Barbara Boxer and Ranking Member Inhofe
Environment and Public Works Committee
410 & 456 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Chairwoman Boxer, Ranking Member Inhofe, Members of the Environment and Public Works Committee:

We, the undersigned scientific and wildlife conservation organizations, have serious concerns about H.R. 306, the Corolla Wild Horses Protection Act, and urge the Committee 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 non-native 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.

- Prevent the FWS from excluding horses from any portion of the refuge which could damage species such as nesting loggerhead sea turtles and piping plovers.

RECOMMENDATION: Allow the FWS to exclude non-native horses when and where their presence would have an adverse impact on native wildlife or plants through removal, fencing, or other means.

- 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.

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,

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