

The Wildlife Society · National Wildlife Refuge Association · National Wildlife Federation · Archery Trade Association · Wildlife Management Institute · Tread Lightly! · Rocky Mountain Elk Foundation · North Carolina Wildlife Federation · Catch-A-Dream Foundation · Dallas Safari Club · Houston Safari Club · Shikar Safari Club International · Orion The Hunter's Institute · Bear Trust International · Quality Deer Management Association · Camp Fire Club of America · Masters of Foxhounds Association · Texas Wildlife Association · Ruffed Grouse Society · Wildlife Mississippi · National Trappers Association · Pheasants Forever · Quail Forever · Delta Waterfowl · Wildlife Forever · Society for Range Management · North American Grouse Partnership · Professional Outfitters and Guides of America · Izaak Walton League of America · Whitetails Unlimited · Ducks Unlimited · National Wild Turkey Federation · Theodore Roosevelt Conservation Partnership

## **Oppose Amendment to the Energy Bill that Threatens Science-based Management on our National Wildlife Refuges**

April 18, 2016

Dear Senator,

The undersigned scientific and wildlife conservation organizations would like to express our strong opposition to Burr Amendment #3175 to S. 2012, the Energy Policy Modernization Act of 2015.

Burr Amendment #3175 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. As a non-native species in North America, free-roaming horses can cause significant ecological damage to native ecosystems, including those in Currituck NWR. This amendment would, therefore, put FWS in a difficult, legislatively mandated position of managing for a non-native species at the expense of the primary intent of the National Wildlife Refuge System to “provide for the conservation, protection, and propagation of native species of fish and wildlife,” as required under the National Wildlife Refuge System Administration Act and the National Wildlife Refuge System Improvement Act.

Furthermore, federal legislation guiding the management of non-native horses on the Currituck NWR is a solution to a nonexistent problem. Non-native horse management on the Currituck NWR is currently guided by an agreement created and signed by local partners in December 2014. Signers include the County of Currituck, North Carolina Department of Environment and Natural Resources, FWS, and the Corolla Wild Horse Fund.

Biologist and wildlife manager discretion, informed by wildlife and ecological science, is imperative for the successful management of multiple resources. Amendment #3175 would strip professionals of that discretion by federally mandating “*a herd of not fewer than 110 and not more than 130 free-roaming wild horses in and around the refuge.*” Equally concerning, it would prevent FWS from excluding non-native horses from any portion of the refuge, which includes sensitive wetland habitat for which the refuge was established. The rigidity of these standards essentially ignores the dynamic nature of modern, science-based management, thereby restricting the ability of FWS biologists and managers to effectively conserve native species under variable conditions.

As supporters of the National Wildlife Refuge System and the native wildlife it works to conserve, we urge you to vote no on Burr Amendment #3175, which would undermine the efforts of FWS to manage refuge resources on behalf of the American public. We thank you for considering our concerns and recommendations and we hope you will work to ensure the integrity of the entire National Wildlife Refuge System and the application of science-based natural resource management by voting against this amendment.

Sincerely,

Archery Trade Association  
Bear Trust International  
Camp Fire Club of America  
Catch-A-Dream Foundation  
Dallas Safari Club  
Delta Waterfowl  
Ducks Unlimited  
Houston Safari Club  
Izaak Walton League of America  
Masters of Foxhounds Association  
National Trappers Association  
National Wild Turkey Federation  
National Wildlife Federation  
National Wildlife Refuge Association  
North American Grouse Partnership  
North Carolina Wildlife Federation  
Orion The Hunter's Institute  
Pheasants Forever  
Professional Outfitters and Guides of America  
Quail Forever  
Quality Deer Management Association  
Rocky Mountain Elk Foundation  
Ruffed Grouse Society  
Shikar Safari Club International  
Society for Range Management  
Texas Wildlife Association  
The Wildlife Society  
Theodore Roosevelt Conservation Partnership  
Tread Lightly!  
Whitetails Unlimited  
Wildlife Forever  
Wildlife Management Institute  
Wildlife Mississippi