

SOCIETY FOR RANGE MANGEMENT · THE WILDLIFE SOCIETY
NATIONAL WILDLIFE REFUGE ASSOCIATION

4 June 2015

The Honorable Dan Sullivan
Chairman
Subcommittee on Fisheries, Water, and
Wildlife
Committee on Environment and Public Works
U.S. Senate
Washington, D.C. 20510

The Honorable Sheldon Whitehouse
Ranking Member
Subcommittee on Fisheries, Water, and
Wildlife
Committee on Environment and Public Works
U.S. Senate
Washington, D.C. 20510

Re: Oppose S. 1204 – the Corolla Wild Horse Protection Act

Dear Chairman Sullivan and Ranking Member Whitehouse,

We, the undersigned scientific and wildlife conservation organizations, have serious concerns about S. 1204, 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 wildlife and plants, the primary intent of the National Wildlife Refuge System lands and in conflict with the establishing purposes of the refuge.

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*”. The Refuge Improvement Act, passed by Congress in 1997 further states 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 wildlife, while simultaneously supporting the persistence of a non-native species.

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 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 natural ecosystems. 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 and require focused, sustained, and expensive management at the expense of native wildlife.

We, as supporters of the National Wildlife Refuge System and the native wildlife it works to conserve, speak out against this legislation that will undermine the efforts of the FWS to manage wildlife resources on behalf of the American public.

Specifically, we are concerned that S. 1204 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.

ISSUE: Congressional specification of a species' population size greatly restricts the ability of wildlife professionals to adjust their management strategies in response to environmental and landscape changes to do what is best for the natural resource.

RECOMMENDATION: The FWS should not manage the non-native horses as a public trust species, like native wildlife; instead, the financial and logistical responsibility of managing the horses should be that of the Corolla Wild Horse Fund. The herd population should be managed at a level agreed upon by both the Refuge and the Corolla Wild Horse Fund, remaining flexible to the changing conditions of the habitat and needs of native wildlife on the refuge.

- Override the Refuge System Administration Act and Refuge System Improvement Act by changing the purpose the refuge's establishment.

ISSUE: This would require the refuge to manage for a non-native species, which undermines the purpose of the refuge and could set precedent for other refuges within the System. This change would be done without considering the Currituck NWR's Comprehensive Conservation Plan (CCP), which was created with public involvement.

RECOMMENDATION: Retain the original purpose of the refuge and allow refuge managers to focus on managing for native wildlife and incorporate the refuge's CCP into any horse management agreements with the Corolla Wild Horse Fund.

We thank you for considering our concerns and recommendations and we hope you will work to ensure the National Wildlife Refuge System's integrity by voting against S. 1204.

Sincerely,

Rick Baydack, President
The Wildlife Society

David Houghton, President
National Wildlife Refuge Association

Pat Shaver, President
Society for Range Management

CC: Members of Subcommittee on Fisheries, Water, and Wildlife