



7 July 2015

The Honorable Richard Burr
217 Russell Senate Office Bldg.
Washington, DC 20510

The Honorable Thom Tillis
SD185 Dirksen Senate Office Bldg.
Washington, DC 20510

Dear Senator Burr and Senator Tillis,

The North Carolina Chapter of The Wildlife Society is concerned about S. 1204, the Corolla Wild Horses Protection Act. The Chapter is a non-profit scientific and educational association of nearly 250 wildlife professionals from all backgrounds involved in research, management, education, administration, and other disciplines. All of our work derives from the basic principle of science-based wildlife management and conservation. We ask that you withdraw your support for this bill based on that basic principle.

The Corolla Wild Horses Protection Act would fundamentally change the purpose of the Currituck National Wildlife Refuge in North Carolina by transferring significant management functions to an external organization and by mandating that a non-native species be managed by the National Wildlife Refuge System. Not only would this be in direct conflict with the established intent of the National Wildlife Refuge, but this legislation would also expose the sensitive habitats and native wildlife of the Refuge to the high risk of negative impacts due to overgrazing and trampling by the horses.

Non-native species are those that have been introduced into an area – they do not occur naturally and have usually been introduced through human activity. It has been well-documented that non-native species are often a serious threat to native plant and wildlife populations. The horses on Corolla are not naturally occurring on the Outer Banks; in fact, all horses are non-native to the United States. The habitats of the Currituck National Wildlife Refuge are not adapted to appropriately support these non-native horses, and the landscape easily suffers damage from trampling and overgrazing by these animals. The environment would be in a better and more natural condition for native species if the horses were completely absent.

Further, the Corolla Wild Horses Protection Act calls for a standard herd size to be set in statute, rather than by the natural forces of the environment. This standard does not

make sense from an ethical or scientific standpoint. Prescribing a population size in statute can be detrimental to ecosystem function as well as the horses. A herd size of 110-130 individuals may surpass the carrying capacity of the environment, to the detriment of native biodiversity and the people who visit the Refuge. An adaptive management strategy that allows flexibility in population target levels and takes into account the needs of native species and the ability of the environment to support the horses is more appropriate. Herd size should be managed by trained wildlife professionals (*i.e.*, the Refuge staff) and not by a political mandate and agencies external to the US Fish and Wildlife Service. Decision-making by invested professionals will better insure that Currituck National Wildlife Refuge is properly managed for the benefit of all citizens.

We appreciate your consideration of our perspectives and encourage you to withdraw the Corolla Wild Horses Protection Act in support of management strategies that provide for sustainability of the native plants and animals at the Refuge. We encourage you to introduce legislation that benefits the natural resources of our great State and the dedicated efforts of agencies charged with the stewardship of those resources.

Sincerely,



Kelly Douglass, President
The North Carolina Chapter of The Wildlife Society