



# THE WILDLIFE SOCIETY

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Hearing on H.R. 306, H.R. 588, S. 266 and H.R. 285  
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Mr. Chairman:

Thank you for the opportunity to testify before the House Natural Resources Committee, Subcommittee on Fisheries, Wildlife, Oceans and Insular Affairs. My name is Michael Hutchins, and I am the Executive Director and CEO of The Wildlife Society.

We appreciate the opportunity to submit testimony regarding H.R. 306, the Corolla Wild Horse Protection Act. Founded in 1937, The Wildlife Society is a non-profit scientific and educational association of over 10,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide.

TWS seeks a world where people and wildlife co-exist, where biological diversity is maintained, and decisions affecting the management, use, and conservation of wildlife and their habitats are made after careful consideration of relevant scientific information and with the engagement and support of an informed and caring citizenry. TWS defines *wildlife* as living organisms that are not humans, domesticated animals, or plants. Wild animals' ancestors have never been domesticated – modified by selective breeding -- whereas feral animals' ancestors were once domesticated but are now free-ranging in the absence of human care. The “wild” horses in America are actually feral and are not part of the native ecosystem.

Invasive, or 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. Feral horses (*Equus caballus*) that roam freely along the Atlantic coast of the U.S. are examples of such species: they are iconic and much-loved by some, but damage wildlife habitat and require focused and sustainable management practices.

Although many now-extinct horse lineages evolved in North America, today's feral horses are not members of the same species as North American fossil specimens. Scientists consider these feral horses to be a recent and disruptive addition to North American ecology, rather than a native species.

Herds of feral horses cause significant changes to barrier island environments. As large herbivores, they alter landscapes through trampling soils and vegetation, selectively grazing palatable plants, and altering the distribution of nutrients in the ecosystem. Specifically, grazing impacts the distribution and abundance of native plant species and affects plant community dynamics (Furbish and Albano 1994). It may alter net aboveground primary production and belowground biomass, produce a network of paths through sensitive systems, and affect plant regeneration (Turner 1987). Trampling of nesting sites is a direct impact to birds. Indirect impacts to marsh faunal communities may also result, including shifts in bird, fish, and invertebrate assemblages and abundances as well as changes in interspecific interactions (Levin et al. 2002).

The result of grazing impacts depends on the location of the grazing activity (i.e. intertidal versus upland), interspecific competition, and herbivory intensity (Furbish and Albano 1994). Overgrazing is a major concern on barrier islands, as it has been shown to degrade habitat and negatively impact sensitive dunes and marshlands by increasing susceptibility to erosion (Seliskar 2003, Keiper 1990). Marshes may also be made more vulnerable to erosion and storm damage if sediment accretion is impaired by reduced grass density (Turner 1987).

The effects of overgrazing are of particular concern in the context of the National Wildlife Refuge System. The National Wildlife Refuge System Improvement Act of 1997 described the mission of the System as follows: the Mission of the National Wildlife Refuge System is 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.

Currituck National Wildlife Refuge, located on the northern end of North Carolina's Outer Banks, was established in 1984 to preserve and protect the coastal barrier island ecosystem. Refuge lands are managed to provide wintering habitat for waterfowl and to protect endangered species such as piping plover, sea turtles, and sea beach amaranth. Various types of wading birds, shorebirds, waterfowl, raptors, mammals, reptiles, and amphibians common to the eastern United States are found on the refuge.

H.R. 306 would make it more difficult for the U.S. Fish and Wildlife Service to manage the feral horses on Currituck National Wildlife Refuge and hamper the Refuge System's mission. The legislation puts the Fish and Wildlife Service in the difficult position of being legislatively required to manage for the conservation of native wildlife and habitat on the one hand and to support a non-native invasive species on the other.

The Wildlife Society has several concerns with the legislation. First, we note that although the current management plan calls for a maximum herd size of 60, this has not been achieved since 2002. The 2010 count was 115, with the horses on a clear upward trajectory. Since the Corolla

Wild Horse Fund has been unable to manage to the previously required level of 60, we are concerned that the herd will soon overshoot the legislation's maximum population size of 120. In addition, the effects of the current herd size of 115, on the refuge and elsewhere, are not documented. Such a herd size should not be legislatively mandated until its effects on the area's native wildlife and habitat are clear.

Second, it is not clear what 'cost-effective' management means in Section 2. Maintaining a stable population of feral horses, which can double in population every four years, will likely require a combination of fertility control measures and removal of excess horses for sale or adoption. The cost of managing a non-native species should not come at the expense of native species. In this case, Currituck Refuge is unstaffed and unfunded. We fear that the funds necessary to manage feral horses on Currituck Refuge will come from Mackay Island Refuge, where they could have been used to manage for native wildlife or improve hunting or other recreational opportunities for visitors. The Corolla area has a strong tradition of waterfowl hunting and related recreation, and we would hate to see this compromised for the sake of an invasive species.

Finally, the legislation would place unnecessary restrictions on the Fish and Wildlife Service's ability to exclude feral horses from sections of the refuge. As written, the bill would only allow removals when the feral horses are threatening the survival of an endangered species for which such land is designated as critical habitat, as documented by a peer-reviewed scientific assessment involving a public comment period. Such a process will require time and substantial resources that are currently not available at the refuge. Refuge staff, trained in wildlife management and conservation, should have the discretion to exclude horses from any area of the refuge when they are causing undesirable effects. This provision would also effectively eliminate the ability of refuge staff to conduct research on the impacts of feral horses on habitat and native species by excluding them from some areas and then comparing the vegetation structure and biological diversity between the enclosure area and areas where feral horses are permitted.

The Corolla Wild Horses Act bill fails to consider the refuge's Comprehensive Conservation Plan and overrides the requirements of the National Wildlife Refuge System Administration Act and Endangered Species Act. Furthermore, it is unnecessary because there is already a horse management plan in place. The current version of the Currituck Wild Horse Management Plan was reviewed and approved in partnership with the Corolla Wild Horse Fund, the County of Currituck, and the NC National Estuarine Research Reserve in 2007.

We strongly recommend that the herd be kept at the 60-horse maximum currently required by the Currituck Wild Horse Management Plan. The lower number of horses would decrease the effects on native wildlife and habitat. Occasionally bringing horses in from the Cape Lookout herd will allay any concerns about genetic diversity. Ideally, feral horses should be removed from the Refuge to allow the native wildlife there to thrive. If this is not done, the areas from which feral horses are excluded on the refuge should be increased to include any sensitive habitats.

Feral horse inventories should be performed at sufficient intervals to quickly determine whether they are having adverse impacts and rapidly implement management actions to control and reduce ecological damage. We also support increased funding for scientifically defensible

assessments of ecosystem conditions that are used to make decisions about feral horse management. Such assessments should consider the welfare of the feral horses, as well as the ability of the system to conserve native plant and animal populations and provide ecosystem services -- clean air, clean water, and carbon sequestration.

### **Literature Cited**

Furbish, C.E. and M. Albano. 1994. Selective herbivory and plant community structure in a Mid-Atlantic salt marsh. *Ecology* 75(4): 1015-1022.

Levin, P.S., J. Ellis, R. Petrik, and M.E. Hay. 2002. Indirect effects of feral horses on estuarine communities. *Conservation Biology* 16(4): 1364-1371.

Keiper, R.R. 1990. Biology of large grazing mammals on the Virginia barrier islands. *Virginia Journal of Science* 41(4A): 352-363.

Seliskar, D.M. 2003. The response of *Ammophila breviligulata* and *Spartina patens* (Poaceae) to grazing by feral horses on a dynamic Mid-Atlantic barrier island. *American Journal of Botany* 90(7): 1038-1044.

Turner, M.G. 1987. Effects of grazing by feral horses, clipping, trampling, and burning on a Georgia salt marsh. *Estuaries* 10(10): 54-60.