



**COROLLA WILD HORSE FUND**  
I N C O R P O R A T E D

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H. Dale Hall  
Chief Operating Officer  
Ducks Unlimited, Inc.  
One Waterfowl Way  
Memphis, TN 38120  
October 15, 2012

Dear Mr. Hall:

Unfortunately, I was not aware of your August 10, 2012 letter to the Senate Environment and Public Works Committee regarding the Corolla wild horses until last week or I would have responded immediately. I would like to provide some historical information, facts and actual data to address several inaccuracies contained in the letter.

As you know, the House bill, H.R. 306, passed unanimously on February 6, 2012. The bill's sponsor, Congressman Walter Jones, sponsored a similar 1998 law to protect the wild horses of Shackleford Banks at Cape Lookout National Seashore. That bill set out a public-private partnership for managing the Shackleford horses. Based on the findings of preeminent equine genetic scientists – Dr. Dan Rubenstein of Princeton University and Dr. Gus Cothran of Texas A&M University – the Shackleford Banks Act defined the size of the Shackleford herd at 120-130 horses, with a minimum of 110 horses.

The Shackleford Banks Act has proven to be extraordinarily successful. In the 15 years it has been in place, the Act has protected the horses for future generations to enjoy. The presence of the horses has resulted in no unacceptable impacts on surrounding habitat.

There is every reason to believe that similar legislation would be equally successful in protecting the wild horses of Corolla. Like the Shackelford Act, H.R. 306 and S. 3448 are based on the sound science of Dr. Gus Cothran, who has found that at least 110 horses are essential to maintaining a viable herd for the future. In addition, it is reasonable to believe the Corolla herd has even less of an impact on surrounding habitat than the Shackelford herd given the fact that the Corolla herd roams twice the amount of geographically similar acreage on Shackelford Banks (7,544 acres vs. 3,000 acres).

In your August 10, 2012 letter you make the following statements that I would like to correct:

- *False Claim: "Passage of this Bill will divert financial and personnel resources away from waterfowl management, to manage designated waterfowl habitats for horses."*

Facts:

- The bill would not require the Fish and Wildlife Service to do anything regarding the horses beyond what they've done for the past five years.
  - Section 2 of the bill explicitly requires the non-profit Corolla Wild Horse Fund to pay for the costs of managing the horses, including coordinating a periodic census, maintaining records, inspecting the health of the horses, removing horses and administering a viable population control plan.
  - Only a fraction of the herd is ever on the refuge. Annual aerial counts consistently place 75% to 94% of the wild horses on privately owned land, NOT the refuge.
- *False Claim: "S3448 will subrogate this funding mechanism to create a horse sanctuary at the expense of waterfowl hunters across the nation."*

Fact:

- S. 3448 does not require that any part of the Currituck Refuge be designated as a "horse sanctuary."

- *Claim: "Recent articles citing an equine genetic expert have indicated that a herd size of 60 with genetic reintroductions would be viable."*

Fact:

- The articles and author are not cited in your letter. If you are referencing Dr. Cothran, the article was NOT in reference to the Corolla horses, whose genetic diversity is one of the lowest of any wild herd anywhere. The herd size of 120 - 130 with never less than 110 as mandated by S. 3448 was based on Dr. Cothran's recommendation for this particular wild herd.

- *False Claim: "The current herd size is approximately 140."*

Facts:

- According to the latest aerial survey of the horses, the current herd size was 121. This survey was conducted on September 13, 2012 by Currituck Refuge Manager Mike Hoff and Corolla Wild Horse Fund Herd Manager, Wesley Stallings. The Corolla Wild Horse Fund paid for the survey. We have since removed two horses bringing the count to 119 - 110 adults and 9 foals.
  - During the September survey, only 8 horses were found on the Currituck Refuge's 3,000 acres and they were not all observed in the same area.
- *False Claim: "The level of impact at this population size, essentially the same as mandated in the Bill, is extremely detrimental to waterfowl as high quality seed producing grasses are incapable of producing seed and the submerged aquatic vegetation is also heavily grazed."*  
Facts:
    - No peer-reviewed research exists to suggest that a population of 110-130 horses is "extremely detrimental to waterfowl" on the Currituck Refuge.
    - In fact, the best available scientific research on waterfowl populations in and around the refuge found that any decline in waterfowl numbers was not due to the horses, but to: 1) Market hunting prior to 1913, and 2) Vegetation: removal of locks in Albemarle/Chesapeake canal, and 3) Development. (See "Historical Populations and Long-term Trends of Waterfowl, Fish, and Threatened/Endangered Species within Back Bay, VA and Currituck Sound, NC" Back Bay, Mackay Island, and Currituck National Wildlife Refuges' Consolidated Report For the Fisheries, Shellfish, Submerged Aquatic Vegetation (SAV), and Waterfowl (FSSW) Working Group with the U.S. Army Corps of Engineers, Wilmington NC: Principal Investigators: Michelle D. Baker and Sterling C. Valentine; Edited by: John B. Gallegos)
  - *False claim: "In recent years, with this rapidly expanding horse population several private hunt clubs have expressed interest in fencing horses off their properties and many others have actually done so."*  
Fact:
    - There are no private hunt clubs operating on the 7,544 acres accessible to the wild horses in the RO2 district.
  - *False claim: "Many native bird species would be negatively impacted by this Bill not just waterfowl."*  
Fact:
    - We are not aware of any peer-reviewed scientific research that has found that a population of 110-130 horses would cause unacceptably negative impacts on birds in the Currituck Refuge.

In summary, S. 3448 is critical to the long-term survival of one of the oldest and rarest horse breeds in the world. These horses are such a treasured part of North Carolina's history that the North Carolina Legislature designated them as the State Horse in May of 2010. The Corolla Wild Horse Fund stands ready to meet with USFWS and other stakeholders to engage in good faith discussion about the bill to see if it can be improved.

In the meantime, the Corolla Wild Horse Fund is taking steps to acquire significant private property that constitutes important habitat for the wild horses. It is our intention to acquire as much property as possible and place it in conservation easements. This will benefit ALL wildlife, waterfowl, and birds, as well as the wild horses.

Please feel free to contact me with any further clarification that you may need.

Sincerely,

Karen H. McCalpin  
Executive Director