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Maeve Valleyly Bartlett  
Secretary  
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October 10, 2014

Libby Herland  
Project Leader  
Massachusetts NWR Complex  
73 Weir Road  
Sudbury, MA 01776

Re: Comments by the MA Department of Fish and Game and its Divisions on the Draft Comprehensive Conservation Plan and Environmental Impact Statement for the Monomoy National Wildlife Refuge

Dear Ms. Herland,

On April 10, 2014 the U.S. Fish and Wildlife Service (“USFWS”) published in the Federal Register (79 FR 19920) notice of the availability for public comment on its Draft Comprehensive Conservation Plan and Environmental Impact Statement (“Draft CCP/EIS”) for the Monomoy National Wildlife Refuge (the “NWR”). On June 27, 2014 USFWS extended the public comment period on the Draft CCP/EIS to October 10, 2014. The Massachusetts Department of Fish and Game (“DFG”) and its Division of Marine Fisheries (“DMF”) and Division of Fisheries and Wildlife (“DFW”) hereby submit our comments on the Draft CCP/EIS, which are organized as introductory comments by DFG, followed by more specific comments by DMF and DFW respectively.

DFG and its Divisions recognize and support the purpose and importance of the Monomoy NWR, particularly with respect to providing a refuge for migratory birds. We also understand the need of USFWS to complete a 15 year Comprehensive Conservation Plan (“CCP”) for the NWR as required by the National Wildlife Refuge System Administration Act. Yet in fulfilling those responsibilities, USFWS must be mindful that long before the Monomoy Islands and surrounding waters were declared to be a NWR, fishermen have engaged in recreational and commercial fishing for a variety of fish and shellfish. The types of gear used by commercial fishermen include rod and reel, shellfish drags, and pots, which are indistinguishable from modern recreational fishing activity conducted in the area. As noted below, we appreciate that the Draft CCP/EIS recognizes that fishing activities in open waters within the NWR above the submerged lands are already adequately protected by federal and state regulation. This determination is consistent with our position that these historic fishing activities off Monomoy have not been shown to have materially interfered

with or detracted from the NWR's purpose of providing a haven for migratory birds. For that reason, our specific comments focus on the adequacy of the justifications in the Draft CCP/EIS that impose prohibitions or additional restrictions on some of these long standing commercial fishing activities.

Finally, DFG notes that the Town of Chatham has raised questions about the boundaries of the NWR and related issues about the scope of USFWS' regulatory jurisdiction in the waters off Monomoy NWR. It is also our understanding that the Commonwealth's Office of Attorney General ("OAG") intends to file public comments with USFWS that address similar issues. Because of their fundamental importance to and potential effect on the CCP process, we urge USFWS to give careful considerations to the jurisdictional issues raised by the Town and the OAG, including by engaging with them directly, before proceeding to a Final CCP/EIS.

## **Specific Comments of the Division of Marine Fisheries**

### ***Introduction***

As discussed in more detail below, DMF's priority concerns about the Draft CCP/EIR are centered on the adequacy of the justifications for the prohibitions in USFWS' Preferred Alternative B in the areas of (1) the harvest of mussels; (2) the use of bottom disturbing gear and techniques on submerged lands in the open waters; (3) the use of wheeled carts for shellfishing; and (4) operation of commercial fishing guides within the refuge unless guides obtain a refuge permit. In addition, DMF has concerns about the adequacy of the evaluation in the Draft CCP/EIS of the socioeconomic impacts of the proposed restrictions on traditional commercial fishing in the NWR, as well as comments on the enforcement strategies outlined in the Preferred Alternative B.

### ***Regulatory Background***

DMF has the authority and responsibility under M.G.L. c. 130, §17 for the development and stewardship of marine fisheries resources, habitat, and harvest of fish. DMF's fisheries management activities are performed through a long-standing strategic partnership with the NMFS and extensive involvement with the New England and Mid-Atlantic Regional Fishery Management Councils ("NEFMC" and "MAFMC"), the Atlantic States Marine Fisheries Commission ("ASMFC"), and the Massachusetts Marine Fisheries Advisory Commission ("MFAC").

The Draft CCP/EIS acknowledges that DMF has jurisdiction and authority over fishing activities within the entirety of Nantucket Sound, notwithstanding the existence of a pocket of federal waters within the center of the sound. 2-83. Specifically, in 1983 the federal Magnuson-Stevens Act was amended to expressly extend the Commonwealth's fishery jurisdiction and authority to this pocket of federal waters by providing that "[f]or the purposes of this Act ... the jurisdiction and authority of a state [Massachusetts] shall extend ... with respect to the body of water commonly known as Nantucket Sound, to the pocket of water west of the seventieth meridian west of Greenwich." 16 U.S.C. §1856(a)(2)(B). In 1992 the First Circuit Court of Appeals held that "the Magnuson Act as amended in 1983 ... expressly confirms ... that Nantucket and Vineyard Sounds are subject to the [fishery] jurisdiction of Massachusetts." *Davrod Corp. v. Philip G. Coates, et al.*, 971 F.2d 778 (1st Cir. 1992). In 2003, the Massachusetts Federal District Court held that "with respect to fishing in the limited

area of Nantucket Sound, the Commonwealth has exclusive regulatory jurisdiction.” *Taxpayers Citizen Group, et al. v. Cape Wind Associates*, 278 F.Supp.2d 98 (D.Mass.2003). On appeal, the First Circuit upheld the District Court confirming that “Congress passed a bill defining all of Nantucket Sound to be within the jurisdiction and authority of Massachusetts for the purposes of the Magnuson-Stevens Act ...” and that this Congressional enactment “did delegate to Massachusetts the power to regulate fishing in Nantucket Sound ...” *Ten Taxpayers Citizen Group, et al. v. Cape Wind Associates*, 373 F.3d 183, (1<sup>st</sup> Cir. 2004).

Pursuant to its state and federal statutory authority, DMF has promulgated regulations at 322 CMR 3.00 – 15.00 governing recreational and commercial fishing in the coastal state and federal waters subject to its jurisdiction. This comprehensive state regulatory program is intended to ensure that the means and level of commercial fishing effort offshore of the Monomoy NWR are sustainably managed, which, in turn, furthers the migratory bird purpose of the NWR. Finally, DMF’s fisheries management regulations serve as enforceable authorities for the Massachusetts Coastal Program Policies for the purposes of a federal consistency review pursuant to the Coastal Zone Management Act, 16 U.S.C. 1451 and 15 CFR §§ 923 and 930, and the state Coastal Zone Management Program regulations at 301 CMR 20.00. *Massachusetts Office of Coastal Zone Management Policy Guide (October 2011), Appendix 3, p.147.*

Turning to the USFWS’ regulatory framework for determining appropriate uses of a NWR, our understanding is summarized as follows:

Under the National Wildlife Refuge System Administration Act, as amended (the “Act”), the USFWS is authorized to permit the use of any area within a NWR for any purpose, including fishing, public recreation and accommodations, and access whenever it determines that such uses are compatible with the major purposes for which such areas were established. 16 U.S.C. § 668dd (d)(1)(A). As noted in the Draft CCP/EIS, FWS policy 603 FW 1 provides for an initial determination as to whether a use is appropriate for a NWR (pages 1-9 - 1-10). An appropriate use must meet at least one of the four conditions specified in the policy, one of which is that the “use involves the taking of fish and/or wildlife under State regulations.” *Id.*

If a use is found to be appropriate, the USFWS then reviews it for its compatibility with the NWR pursuant to policy 603 FW 2 (page 1-10). The USFWS policy on compatibility notes that under the Act fishing is one of six wildlife-dependent uses that are to receive “enhanced consideration” on a NWR. *Id.* The USFWS defines a “compatible use” to mean any use that will not materially interfere with or detract from the fulfillment of the NWRS mission or the purpose(s) of the national wildlife refuge. *50 C.F.R. 25.12 and 603 FW 2.*

The Draft CCP/EIS acknowledges that USFWS’ regulations and the relevant policy (603 FW 2) allow economic activities on a NWR if they contribute to the achievement of NWR purposes or the mission of the NWR system (page 3-22). Indeed, USFWS’ regulations expressly allow for the commercial harvest of fishery resources on a NWR by issuance of a permit or by refuge-specific regulation when such use is compatible and contributes to the achievement of the purposes of the refuge. *50 C.F.R. § 29.1. and 31.13.*

However, the Draft CCP/EIS reaches different conclusions with respect to the compatibility of the various traditional fisheries off Monomoy. On one hand, USFWS defers to state and federal management of certain fisheries, stating:

“At this time, there is no compelling Service interest necessitating further regulation of fishing in open waters lying above the submerged lands within the Declaration of Taking... These activities do not cause disturbance to the submerged lands and are already regulated by other Federal and State agencies (e.g., the National Marine Fisheries Service and [DMF].” (page 3-21).

Consequently, all the alternatives in the Draft CCP/EIS would continue to allow “fishing in the open waters, above submerged lands, under State and Federal regulations” (page 3-111). For example, USFWS’ compatibility determination (“CD”) for recreational fin fishing only covers activities “occurring outside the open waters lying above the submerged lands within the Declaration of Taking” since “fishing occurring in this open water area will be regulated by the National Marine Fisheries Service and the Massachusetts Division of Marine Fisheries” (D-93). DMF concurs with the USFWS’ determination, which is consistent with our long-standing position.

On the other hand, the Draft CCP/EIS categorically prohibits methods of fishing that disturb the bottom of submerged lands, stating:

“The refuge would remain open to fin fishing (except using methods that disturb the bottom)” (page 4-38) and “The fish weir that is sometimes located within the Declaration of Taking area would not be allowed if the installation of that weir results in bottom disturbance” (page 4-86).

As next discussed in more detail below, DMF questions the basis and adequacy of the justification in the Draft CCP/EIS for this categorical prohibition regarding any disturbance of the submerged bottom by traditional fishing activities.

### ***Fisheries Harvest Using Bottom Disturbing Gear and Techniques on Submerged Lands***

As a general matter, DMF shares USFWS’ interest in minimizing impacts from fishing activities in Massachusetts, and when specific impacts are identified, DMF has promulgated regulations at 322 CMR to minimize those impacts. For example, under 322 CMR 3.04, DMF closed an area south of Falmouth to squid trawling to protect eelgrass. DMF also agrees with the studies referenced in the Draft CCP/EIS’ justification of its finding of appropriateness regarding “Fisheries Harvest Using Bottom Disturbing Gear and Techniques on Submerged Lands” that suggest bottom-tending fishing gear “can have an impact” but “depending on the scale” (page D-18). However, much of the literature referenced therein does not apply to the resources, bottom types, and fishing gears found within the Declaration of Taking area, and the Draft CCP/EIS’ categorical conclusion that there is adverse impact from bottom disturbing gear is simplistic and overreaching. As discussed in more detail below, DMF is requesting that USFWS reassess the conclusions reached in this section of the Draft CCP/EIS, based on a broader range of relevant information.

The Draft CCP/EIS failed to identify the primary fishing practices or habitats of concern within the Declaration of Taking area. The Draft CCP/EIS appears to focus on otter trawling, scallop dredging, and fish weirs (page D-18), though USFWS may also mean to include bay scalloping and hydraulic clamming. Yet, elsewhere in the Draft CCP, USFWS states, “Trawling does not likely occur within the Declaration of Taking boundary due to the shallow depths and heavy boating traffic” (page 2-86). The above referenced justification

states, however, that otter trawling for fin-fish is identified as one of the most common fishing practices using bottom gear conducted within the Declaration of Taking area (page D-18).

The large majority of habitat in the submerged waters adjacent to the intertidal refuge waters where trawling and fish weirs would occur is high energy sandy substrate which is the most resilient and least vulnerable habitat to fishing (NEFMC 2012). Furthermore, the area is closed by state regulation to mobile bottom tending gear from May 1 to October 31 (322 CMR 3.02(6)). The Consensus Building Institute (“CBI”) study did not identify bottom fishing as an issue for the refuge (CBI 2004), and the Town of Chatham has gone to great lengths to create regulations that address conservation goals while enabling fishing activities. Given this contradictory information, DMF questions whether USFWS’ approach for determining the compatibility of this fishing use is consistent with the five principles in the Strategic Habitat Conservation Strategy laid out on page 2-4 of Draft CCP/EIS.

The above justification (page D-18) also identifies weirs as occurring within the Declaration of Taking Boundary, but the implications are not discussed therein. Instead, it is the Socioeconomic Environment section of the Draft CCP/EIS that concludes that “The fish weir that is sometimes located within the Declaration of Taking area would not be allowed if the installation of that weir results in bottom disturbance” (page 4-86). But there is no significant discussion in the Draft CCP/EIS of the potential benthic impact of fish weirs as they are deployed within the Declaration of Taking Boundary, and no references provided to suggest this fishing practice affects the achievement of refuge goals. To put this issue in perspective, fish weirs use a set of small-diameter poles that extend seaward from the shore. They are placed in the sediment each spring and removed later in the summer/fall. Moreover, the CBI study did not identify weir fishing as an issue for the NWR from the perspective of impact on birds or impact on wilderness character (CBI 2004). For these reasons, DMF believes that it is highly unlikely that fish weirs are negatively affecting the achievement of the conservation goals of the NWR.

Eelgrass is an important food source for some birds and a critical habitat for marine fisheries. DMF has a ten-year old eelgrass restoration and mapping program which is currently preparing an assessment of fishing gear impacts within eelgrass meadows. The Draft CCP/EIS describes eelgrass losses in or near the Monomoy NWR in the 1930’s and 1970’s, and attributes those losses to wasting disease and physical changes such as changes to the North Monomoy/South Beach break in 1978 (pages 2-78 and 2-82). It also describes more recent monitoring done by MassDEP that showed gains in eelgrass coverage in Morris Bay (page 2-33). DMF’s review of Google Earth images suggests there is a wide area of losses south of Inward Point which occurred gradually between 2003 and 2008 and has since remained essentially stable. See Attachment 1. However, the water depths in the area are 3-5 feet MLLW according to NOAA charts, making the use of large vessels and heavy fishing gear infeasible. There is no evidence of scarring from trawls or boats, and the fish weirs are all located outside of the extent of the eelgrass meadow. There is evidence in the photos of shifting shoals.

The justification in the Draft CCP/EIS for the incompatibility of “Fisheries Harvest Using Bottom Disturbing Gear and Techniques on Submerged Lands” (page D-18) suggests that all fishing activities degrade eelgrass beds. However, elsewhere in the Draft CCP/EIS (page 2-80), USFWS identified methods that do not have an impact on eelgrass (e.g., bay scallop dredges that do not have rakes), and bottom disturbing fishing practices (shellfishing) that do not occur in eelgrass (page 4-46). USFWS also acknowledged that some bottom-

tending gear has no impact (pots, page 4-46). These findings support DMF's view that the impact of fishing gear on eelgrass is dependent on the gear type, scale, and location (see also ASMFC 2000). Even trawls can have no impact on eelgrass beds; in fact, trawls are commonly used to study nekton in eelgrass beds (Edgar et al 2001, Guest et al 2003, Leber & Greening 1986). In contrast, some bird species, such as Canada goose, have been documented to denude a complete eelgrass meadow in a single season (Short et al 2006).

One of the references used in the above referenced justification to describe the value of eelgrass was a report done by the Connecticut DEP and DA, which set forth a detailed assessment of various types of commercial fisheries on eelgrass. The report concluded that "[a]vailable evidence indicates that increased nitrogen loading is likely to be a primary cause of the long-term eelgrass decline in Connecticut's waters" and that "[r]ecreational and commercial fishing gears do not appear to be a significant threat to eelgrass at this time; therefore, no immediate regulatory action is needed" (CT DEP and DA 2007).

The above referenced justification in the Draft CCP/EIS for "Fisheries Harvest Using Bottom Disturbing Gear and Techniques on Submerged Lands" relies on a single reference about commercial mussel harvesting in Maine (Neckles 2005) to suggest that all fishing activities degrade eelgrass beds.

In summary, the Draft CCP/EIS does not contain a sufficiently supported justification for USFWS' determination that the long-standing fishing activities in the NWR adversely impact eelgrass beds. Because of the critical value of this marine habitat for both birds and fish, it is important that there be a more complete and thorough assessment of potential causes for impacts to eelgrass beds. Only then can USFWS take the appropriate steps to protect eelgrass areas (e.g., to ensure that eelgrass meadows are marked in anchoring areas and common motor boating locations).

DMF recommends that the Draft CCP/EIS heading "Fisheries Harvest Using Bottom Disturbing Gear and Techniques on Submerged Lands" be revised to state more generally "Non-fishing Benthic Impacts," and that the Finding of Appropriateness and Compatibility Determination be redone to assess more specifically, based on a broader range of relevant information, whether and the extent to which fishing activities are the cause of significant impacts to bottom submerged areas.

### ***Shellfishing***

The Town has worked closely with USFWS for the past decade to establish that in the intertidal, traditional hand-raking for shellfish is compatible with the wildlife goals of the refuge. The Draft CCP/EIS identified the above type of shellfishing as compatible with the purpose of the NWR (D-140-151). DMF commends USFWS on its thorough compatibility analysis and determination for shellfishing (for soft shell clams, razor clams, and quahogs). However, there is insufficient discussion of how the prohibition on the use of carts will affect shellfishermen. Such a prohibition may make shellfishing so impractical as to result in its effective prohibition, which would be an outcome that is inconsistent with USFWS' compatibility determination.

The draft CCP/EIS states that "eliminating the use of wheeled carts in the Monomoy Wilderness will maintain wilderness characteristics and enhance visitors' wilderness experience" (D-151). Yet USFWS identifies the presence of other people as the primary

determinant of wilderness value (D-151). DMF notes that without the use of carts, it takes shellfishermen longer to move the shellfish off the flats, thereby extending the time the shellfishermen are present. Arguably, that unintended consequence would have an even greater impact on the wilderness characteristics than if carts were used. Furthermore, there are other uses that clearly impact the wilderness character of the refuge even more but are determined to be compatible. For example, motor boating, while "generally not allowed in wilderness," is allowed at Monomoy as an exception because "the use of motorboats at Monomoy refuge had already been established and was deemed desirable [sic]" (page D-130). The same reasoning applies to the use of wheeled carts by shellfishermen; it also is a use that has already been established and is desirable. For above reasons, DMF recommends removing the prohibition on cart usage.

### ***Mussel harvest***

There is insufficient evidence presented in the Draft CCP/EIS that the long standing mussel harvest activities on the NWR is adversely impacting the migratory birds. DMF believes that in cooperation with the Town and DMF and other the state regulatory agencies, appropriate fisheries management measures can be implemented that allow this traditional activity to continue at a scale appropriate for the NWR. Such fisheries management measures may include seasonal restrictions, area management, gear restrictions, and quotas.

### ***Permit for commercial fishing guides***

The requirement in the Draft CCP/EIS that all commercial fishing guides obtain a permit from USFWS should be modified (page 3-112). Instead, DMF recommends that USFWS only require the permit for those for-hire vessels or persons providing guide services that use the upland habitat, or come ashore with a vessel.

DMF's primary concern is that the proposed requirement is impractical and unenforceable. First, all for-hire fishing vessels operating in the Commonwealth must already obtain a for-hire permit from DMF. Second, the area around the NWR is a veritable marine highway for so many small scale commercial and recreational vessels operating between Nantucket Sound and waters east of Cape Cod. Depending on the seasonal abundance and seasonal availability of fish species, this area could be fished by nearly all the for-hire operators in the Cape Cod and Nantucket area at some point in the year on an occasional basis. As a practical matter, many commercial fishing guides could be fishing within the NWR without being sure whether they were inside the boundaries. Moreover, many for-hire vessel owners use their vessels for both recreational and commercial fishing. At any particular time, a vessel within NWR waters with anglers aboard could be involved in recreational, commercial, or for-hire fishing, with a permit from USFWS required in only the latter instance.

For these reasons, it would be more appropriate and practical to require the additional USFWS permit only for those guides who conduct saltwater fishing from the shore, including those vessels that come ashore with clients.

To facilitate DMF's recommendation, we are prepared to work with NWR staff to identify all for-hire fishing vessel operators, especially those on the Cape and Islands, and to conduct surveys or develop research questionnaires to estimate the use of the area by these stakeholders

## *Socioeconomic impacts*

The Draft CCP/EIS appropriately recognizes the cultural relevance of both hunting and fishing in the NWR:

“Traditional consumptive uses such as hunting and fishing have a historical significance on Cape Cod, especially in the Chatham area, and there are still those in the area who make their living from the land. This culture of sustainability necessitates a strong connection to the environment. The refuge is vital to this culture and a significant part of the community” (page D-208).

However, we remain concerned that the socio-economic impact of the proposed restrictions on the long standing fisheries in the NWR has not been adequately evaluated in the Draft CCP/EIS. While USFWS acknowledges that “[t]he actions we propose could impact the Town of Chatham’s efforts to sustain a local fishing industry and have a financial impact on some individuals” (page 4-86), the Draft CCP/EIS does not contain information regarding the potential socioeconomic impact of removing bottom trawling, bay scalloping, and weir fishing on this historical coastal community. For example, the Cumulative Impacts section of the Draft CCP/EIS has only a cursory analysis of the effect of the three alternatives on the “socioeconomic environment.” (page 4-86). With respect to fishing, it states that the proposed restrictions on both recreational and commercial fishing “would directly impact people engaged in these activities,” and that it “could impact the Town of Chatham’s efforts to sustain a local fishing industry” (page 4-86). The specific prohibition of using carts while shellfishing by hand could dramatically impact the economic practicability of shellfishing in the NWR, but this issue is not mentioned in the Draft CCP/EIS or in the Monomoy National Wildlife Refuge Economic Analysis Technical Report (Maillet 2013).

For these reasons, USFWS needs to develop a more robust socio-economic analysis for the Final CCP/EIS, based on input from the affected fisheries stakeholders. The results of this expanded and more detailed socio-economic analysis must, in turn, be used as the basis for revisiting the relevant findings and determinations in the Draft CCP/EIS.

## *Enforcement*

In Alternative A, the status quo alternative, a goal/strategy is to “Coordinate with the Town of Chatham Shellfish Warden as needed to discuss shellfish resource management, harvest levels, harvest regulations, and enforcement” (page 3-65). Alternatives B and C do not include the above coordination strategy, and at the same time, propose additional restrictions on long-standing fishing practices. DMF is concerned that implementation of either of the latter alternatives will adversely affect the existing working relationship with the Town with respect to issues relating to fishing and shellfishing.

There are currently two enforcement staff based in Sudbury, MA for the entire NWR (pages 2-105, 3-15, and G-1). The preferred alternative recommends eight new positions, two of which are enforcement personnel onsite at Monomoy. It is important, however, that USFWS employ this expanded enforcement presence consistent with the Strategic Habitat Conservation (“SHC”) principle (#3) of “working collaboratively with a broad range of partners to create and carry out conservation strategies with value at multiple spatial scales” (page 2-4). This also necessitates USFWS pro-actively engaging regulatory partners such as

DMF and Town to collaboratively assess the impact, if any, of the various traditional fishing activities on NWR and to cooperate on enforcing agreed upon restrictions that are intended to prevent or minimize documented impacts.

### **Specific Comments of the Division of Fisheries and Wildlife**

The Division of Fisheries and Wildlife ("DFW") is responsible under M.G.L. c. 131 for the conservation, restoration, protection and management of the inland fish and wildlife resources of the Commonwealth. Specifically, DFW regulates recreational fishing on inland waters and recreational hunting, including waterfowl hunting, and other wildlife management activities at 321 CMR 2.00 – 9.00. DFW's mission also includes conserving and protecting endangered, threatened and species of special concern pursuant to the Massachusetts Endangered Species Act, M.G.L. c. 131A ("MESA"), and the MESA regulations promulgated thereunder at 321 CMR 10.00.

#### ***Waterfowl Hunting***

The Draft CCP/EIS acknowledges that waterfowl hunting has regularly occurred within the Monomoy NWR since the establishment of the Refuge (page 3-115). DFW is appreciative that USFWS' Preferred Alternative B would officially open up 40% of the Refuge to waterfowl hunting in accordance with Federal law and Massachusetts regulations, and affirms that this form of hunting is a compatible, priority public use (pages 3-115 – 3-116).

### **Conclusion**

Thank you again for the opportunities to provide our input on the Draft CCP/EIS. DFG and its Divisions look forward to continuing to work cooperatively with the USFWS during its development of the Final CCP/EIS for the Monomoy NWR.

Sincerely,



Mary B. Griffin  
Commissioner

Sincerely,



Paul J. Diodati  
Director, DMF

Sincerely,



Wayne F. MacCallum  
Director, DFW

cc: Wendi Weber, Regional Director, USFWS

Attachment