National
Wildlife Refuge
Association

October 10, 2014

Libby Herland, Project Leader
Eastern Massachusetts National Wildlife Refuge
Complex, 73 Weir Hill Road
Sudbury, MA 01776

Dear Ms. Herland,

We applaud the efforts of the staff at the Monomoy National Wildlife Refuge (NWR) in the release of a draft Comprehensive Conservation Plan (CCP) and Environmental Impact Statement to guide the next 15 years of management of the Monomoy NWR. Crafting a CCP is a challenging, and at times controversial, public process, mandated by Congress in the 1997 Refuge System Improvement Act, and must be guided by science to its role as an essential management tool.

After careful review of the alternatives in the draft CCP, we strongly support Alternative B, which would both offer new and existing wildlife-dependent recreational activities for the public and also maintain management actions for the refuge's purposes and adherence with the Wilderness Act. The U.S. Fish and Wildlife Service (Service) is obligated to provide appropriate opportunities for the public to recreate while ensuring all activities contribute to and are compatible with the purposes of the refuge, the National Wildlife Refuge System and also adhere to the Wilderness Act where applicable.

Monomony NWR – Community Asset
Although some of the more than 560 national wildlife refuges nationwide are rural and remote, the vast majority are valuable assets to their local communities, providing places to connect with nature and recreate in wildlife-dependent pursuits. Monomoy NWR is certainly the epitome of how these natural areas are integral parts of local communities. We are convinced that Monomoy NWR is to the Town of Chatham as the National Mall is to Washington, D.C. While both cities would exist without the respective national park and national wildlife refuge, these protected areas are inextricably tied to how the cities define themselves. The Town of Chatham has a vital interest in any potential management changes on the refuge and seeks to work closely with the Service as the CCP is implemented.

We think the Service has done an admirable job in their public outreach on the proposed management alternatives in the draft CCP and we urge the Service to keep this dialogue open and constructive through the CCP process and beyond.

Monomony NWR – Biological Asset
Monomoy NWR is regionally and internationally recognized for its exceptional habitat that protects and supports migratory birds, marine resources and species on Federal and State threatened and endangered lists.

- Monomoy NWR was listed fourth among 96 sites meeting the Western Hemisphere Shorebird Reserve Network (WHSRN) shorebird staging site criteria in 1995, and in 1999, was designated as a WHSRN regional site;
- Monomy NWR was designated as an Important Bird Area (IBA) by the Massachusetts Audubon Society in 2000; and
- Monomoy NWR was designated as a Marine Protected Area (MPA) in 2000.

These three International/Regional designations speak for themselves. Seldom does an individual refuge excel in as many ways as does Monomy NWR.

The National Wildlife Refuge System Improvement Act of 1997
In 1997 Congress sought to resolve ongoing challenges facing national wildlife refuges that stemmed from a lack of comprehensive organic legislation providing overarching and consistent guidance for refuge management. Indeed, leading up to passage of the Improvement Act it could be said that the Refuge System was really not managed as a system, but instead as set of disparate lands and waters with differing purposes and priorities. By requiring that refuges adhere – to the extent practicable – to both their establishing purposes and an overarching Refuge System mission, a necessary level of consistency was established. Monomoy NWR is one of more than 560 refuges nationwide and while it is unique, its adherence to the Improvement Act is tantamount. If one refuge in the System does not comply, it weakens the entire 150 million-acre National Wildlife Refuge System.

The Service was given a very clear mandate by Congress to ensure the appropriateness of activities on refuges – where wildlife conservation is the primary goal. Guidance in the Improvement Act includes:

- A clear standard for determining the compatibility of proposed and existing public and commercial uses;
- A requirement that the long-term integrity of refuges and the System be achieved through the strategic conservation of lands and waters;
- A requirement that the Refuge System ought to conserve a diversity of species and ensure the biological integrity of refuges;
- Establishment of the "big six" priority public uses (hunting, fishing, photography, wildlife observation, education and interpretation) as a way of clarifying for refuge management and the public that other uses are considered secondary in developing and implementing management strategies;
- A requirement that refuge managers coordinate closely with private landowners and states in conserving wildlife;
- A mandate to monitor wildlife populations in an effort to better understand the habitat needs of wildlife; and
- The requirement that all non-Alaskan refuges complete a Comprehensive Conservation Plan (CCP) within 15 years of enactment.

Refuge managers are authorized to use "sound professional judgment" to decide whether or not actions or policies that have occurred on a refuge in the past, or are proposed to occur in the future, are compatible with the purpose of the refuge or the mission of the System. In accordance with the Improvement Act and as indicated by sound science, the draft CCP at Monomoy NWR prohibits such inappropriate uses as kite boarding and jet skiing. Some in the public will consider this policy as unnecessary, but we are strongly in support of this decision. It is the Service's duty as the stewards of the Monomoy NWR for the American public to use sound professional judgment - even when it is controversial and difficult.

Monomoy NWR Wilderness Lands and Adherence to Wilderness Act of 1964
Although the Monomoy NWR must be managed in accordance to the Refuge System Administration Act of 1966 and the Refuge System Improvement Act of 1997, it must also adhere to its Congressional designation as part of the National Wilderness Preservation System. The Monomoy Wilderness was created in 1970 when Congress decreed that 2,600 acres of refuge lands would be managed as Wilderness – the strongest conservation protection in the world. This Wilderness designation expanded the original establishment purpose of the refuge – to manage and protect migratory birds – to manage and protect Wilderness character and values.

The definition of Wilderness is in section 2(c) of the 1964 Wilderness Act states: *"A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. In this act, an area of wilderness is further defined to mean an area of undeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historic value.*"

The Service has a responsibility to the American people and future generations to ensure this Wilderness quality is retained as much as possible. The Monomoy Wilderness is currently the only nationally designated Wilderness on the densely populated southern New England coastline and thus is irreplaceable. We feel most of your recommended activities in Alternative B would ensure Wilderness values are preserved although we are concerned that the use of motorized boats in Wilderness areas could be inconsistent with the objectives of the Wilderness Act. We strongly support your proposed actions to, *"Emphasize wilderness stewardship in interpretive materials and outreach to visitors."* We urge you to implement these programs and interpretation as quickly as funding allows.

Land Conveyance to Monomoy NWR
We strongly support the Service in its boundary addition of 717 acres of the Nauset/South Beach although we understand there is a disagreement with the Town of Chatham. We feel case law, as well as other examples nationwide, shows the Service is correct in adding these acres to the Monomoy NWR since these coastal systems are dynamic and ever changing. For example, at the Back Bay NWR, a coastal refuge in southern Virginia, shifting sands have added acreage to that refuge several times, whereas the Willapa NWR on the coast of Washington has actually lost approximately 940 acres to the state of Washington.

This additional land at Monomoy NWR must be managed as part of the Refuge System as well as part of the Wilderness Preservation System. Regular communication with stakeholders including the Town of Chatham, the state of Massachusetts, the National Park Service and other local non-governmental organizations, is essential, but the management of federal land remains the responsibility of the federal government and the U.S. Fish and Wildlife Service.

We thank you for considering our comments.

Sincerely,

David Houghton
President