



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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Hadley, Massachusetts 01035-9589

In Reply Refer To:
FWS/Region 5/11079

JUL 17 1996

Honorable John Joseph Moakley
House of Representatives
Washington, DC 20510

Dear Mr. Moakley:

Acting Director John Rogers has asked me to respond to your letter dated June 18, regarding the U.S. Fish and Wildlife Service's avian diversity restoration project on Monomoy National Wildlife Refuge. We understand your concern about the project.

In this project, as in many others, the Service has the sometimes-difficult task of balancing national interests, refuge objectives, endangered species priorities, and local input. In challenging situations such as this, we work hard to find solutions that allow us to carry out our mission as stewards of this country's wildlife resources for the public benefit, while taking the concerns of individuals and organizations into consideration.

While piping plover numbers are increasing, particularly in New England, the Atlantic coast population is still small and vulnerable to extinction. The rate of growth of the Monomoy piping plover population lags behind that of nearby sites, and the presence of gulls is the major factor retarding the rate of piping plover recovery on the Refuge. The National Wildlife Refuge System is the first place the Service is likely to look for sites where long-term protection can be assured for endangered and threatened species.

Current data suggests that the statewide herring gull population is now declining, while the great black-backed gull population continues to increase. Even as Monomoy gull numbers shrink, as they have in recent years, herring and great black-backed gulls continue to occupy and dominate the majority of suitable habitat on the refuge and displace other nesting species. This situation would likely continue indefinitely unless we intervened. Your statement that gulls are not the only predators of plovers is correct, but the gulls are the only species depriving plovers, tern, and other species of nesting habitat, and that is a far more significant problem than predation.

DRC-1339 is believed to be the most effective method currently available to clear nesting gulls from an area where they have a history of success. It also poses the least amount of disturbance (of other available techniques) to other inhabitants. Section IV Appendix G of the enclosed final Environmental Assessment reflects the Service's consideration of several alternatives suggested during the public comment period, as well as clarifies several other alternatives originally considered, but not analyzed in the EA. Herring and great black-backed gulls are long-lived (up to 20 years or more), and once they have a history of successful nesting on site, they are very tenacious. No other method has been demonstrated to be effective in removing large numbers of gulls from an area where they have established themselves as successful nesters.

The Service followed *National Environmental Policy Act* requirements in preparing for this project. The Service proposed several alternative courses of action in a draft environmental assessment. We sought public comment during a 45-day period and held an informational open house and a public meeting in Chatham in March.

More than 200 comments were received from scientists, naturalists, school children, residents, and other interested parties. As can be expected with any controversial plan, not all were in favor. NEPA is not intended to be a voting process, but rather an opportunity for others outside the Service to review our proposals and point out facts, issues, or other items we may have overlooked. I assure you that numerous and substantive changes were made in the preparation of the final document based upon those comments.

The Service intends, by this course of action, to redress a human-abetted overpopulation of gulls. Gulls were not known to nest in Massachusetts prior to 1920, and the first recorded nesting on the Refuge occurred in 1961. Piping plovers, however, are described by 19th century naturalists as a common summer resident on the beaches of the Atlantic Coast. When human populations on Cape Cod rose dramatically, gull populations did likewise in response to human-provided food sources.

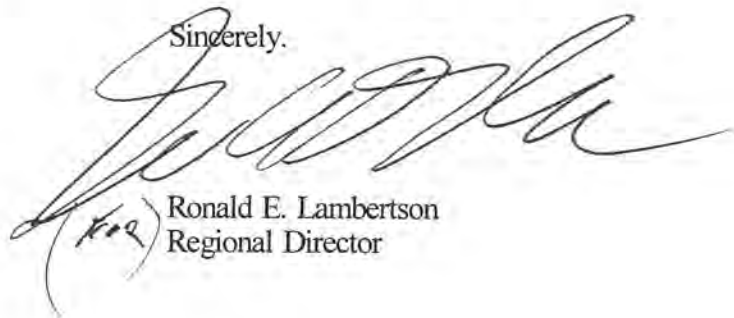
In 1995, 12,550 pairs of gulls nested on the Refuge alone, compared to 14 pairs of piping plovers. They comprised 95 percent of the Refuge's bird population. Gulls, being larger and more aggressive, usurp the habitat occupied by plovers. The recovery plan for piping plovers on the Atlantic Coast requires long-term protection of habitat to support 2,000 pairs (625 pair in New England).

The information we are receiving does not support the notion the project was "a disaster" rather it shows a high degree of success with regard to the intended purpose. Based on our survey the week of June 24, fewer than 700 gulls remain in the treatment area, as compared to approximately 5,664 (assuming two birds/nest and 2,832 active nests baited) gulls prior to baiting. Positive response by intended species has been almost immediate (note enclosed news release of June 28).

We are already seeing substantial improvement in the diversity of nesting birds in the project area on the north end of South Monomoy Island. Roseate terns, laughing gulls and black skimmers are nesting in the project area after a several-year absence. Five or six pairs of piping plovers are nesting in the project area. Least terns and common terns are nesting there in significantly higher numbers than in previous years. This very positive response provides a hopeful sign for achievement of intended results.

If you have questions regarding particular aspects of the project, please contact Ralph Pisapia, Northern Geographic Assistant Regional Director, at 413-253-8600, or Ron Howey, Geographic Assistant at 413-253-8605.

Sincerely,



Ronald E. Lambertson
Regional Director

Enclosures