



Advocacy Department

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Ms. Wendi Weber, Regional Director  
US Department of the Interior/U.S. Fish and Wildlife Service  
Northeast Regional Office  
300 Westgate Center Drive  
Hadley, MA 01035-9587

Mr. Jeffrey S. Dykens, Chairman  
Town of Chatham  
Board of Selectmen  
549 Main Street  
Chatham, MA 02633

Dear Regional Director Weber and Chairman Dykens:

Mass Audubon encourages the US Fish and Wildlife Service (USFWS) and the Town of Chatham to develop a Memorandum of Understanding (MOU) to coordinate management of and within the western boundary of the Monomoy National Wildlife Refuge (Monomoy). In addition, we encourage you to not rely on the US Congress to resolve any disputes in this regard.

Mass Audubon supports maintaining the existing western boundary of the Refuge while providing the Commonwealth of Massachusetts and the Town of Chatham with the responsibility of sustainably managing the traditional harvest of softshell clams and quahogs by local fishermen in this area. We know of no scientific data to indicate the harvesting of clams and quahogs, as conducted for many years at Monomoy, has had a negative impact on wildlife, migrating shorebirds, or tidal flat habitat.

The 7,921-acre Refuge, of which 3,900 acres is in the disputed western boundary area, protects a fragile and vulnerable coastal habitat for fish and wildlife within a series of barrier islands and beaches. As you well know, these dynamic coastal land forms are constantly reshaped by the winds, waves, tides and currents of the Atlantic Ocean to the east and Nantucket Sound to the west.

Established in 1944 to conserve migratory birds, Monomoy provides a haven for numerous species including the federally-listed Roseate Tern, Red Knot, and Piping Plover as well as Oystercatchers, Eider, and many others. It also provides an extensive haul-out for grey seals. The majority of

Monomoy is wilderness, designated by Congress in 1970 and comprising the only coastal wilderness area in New England.

The *Monomoy Comprehensive Conservation Plan* (2014), on which we submitted comments (October 10, 2014), includes compatibility determinations on whether various recreational and commercial activities may occur in the refuge. We believe altering Monomoy's western boundary would expose wildlife, and the fragile habitats upon which they depend, to new activities such as horseshoe crab and mussel harvesting, uses we consider incompatible with the refuge's biological integrity and environmental health.

Regarding horseshoe crabs, Monomoy is one of the largest spawning sites for this species in eastern Massachusetts. The eggs of the horseshoe crab play an integral role in the Monomoy ecosystem where they are an important food source for countless marine species and migratory birds. However, horseshoe crabs were severely overfished in the 1980's and 1990's. In an effort to increase their population, their harvest at Monomoy was prohibited 2000 - that should not change.

In late June and early July, horseshoe crab eggs become available as an important food source for migrating shorebirds. Reducing the food source can diminish the migratory bird population. The eggs are especially critical to the Red Knot - a federally-listed threatened species whose survival along the eastern seaboard depends on horseshoe crab eggs. The birds ingest the eggs to build up their energy reserves during their 16,000 mile round-trip between the tip of South America and breeding grounds in the Arctic.

We highlight the issue of horseshoe crabs as they remain under increasing pressure from the recreational fishing industry and the biomedical industry for use as bait and in medical research, respectively. We therefore support the continued ban on commercial harvesting of horseshoe crabs at Monomoy. While the harvested populations elsewhere on the Cape are low and still declining, the population at Monomoy has rebounded following the 2000 closure. Frequent observations of thousands of juvenile crabs by Mass Audubon and refuge staff is evidence that Monomoy is successfully serving as a nursery for the crabs. Peer reviewed research (Grady and Valiela 2006) indicates that Monomoy serves as a protected source population that provides for the horseshoe crab harvest elsewhere in Chatham.

Monomoy's Blue mussels are also an important food source for ninety percent of the North American population of Common Eider that winter on the refuge shoals. Long-tailed Ducks also participate in the winter feeding frenzy at Monomoy.

In conclusion, Mass Audubon urges that a USFWS – Town of Chatham MOU protect important fisheries resources for birds and other wildlife while simultaneously allowing for the traditional harvest of clams and quahogs by local shellfishermen within the 7,921- acre Refuge. We believe that such an MOU could be consistent with and advances the mission of the Monomoy National Wildlife Refuge.

Thank you for your attention to our suggestions and concerns. As always, Mass Audubon remains available to work with state, federal and local officials to further the understanding and appreciation of the wonderful natural resources that Monomoy has to offer.

Sincerely,



Jack Clarke, Director  
Public Policy & Government Relations

JC:JC

cc: Massachusetts Congressional Delegation  
Cape & Islands Legislative Delegation  
Governor Charles Baker

*Mass Audubon protects 36,500 acres of land throughout Massachusetts, saving birds and other wildlife, and making nature accessible to all. As Massachusetts' largest nature conservation nonprofit, we welcome more than a half million visitors a year to our wildlife sanctuaries and 20 nature centers. From inspiring hilltop views to breathtaking coastal landscapes, serene woods, and working farms, we believe in protecting our state's natural treasures for wildlife and for all people—a vision shared in 1896 by our founders, two extraordinary Boston women. Today, Mass Audubon is a nationally recognized environmental education leader, offering thousands of camp, school, and adult programs that get over 225,000 kids and adults outdoors every year. With more than 125,000 members and supporters, we advocate on Beacon Hill and beyond, and conduct conservation research to preserve the natural heritage of our beautiful state for today's and future generations. We welcome you to explore a nearby sanctuary, find inspiration, and get involved. Learn how at [massaudubon.org](http://massaudubon.org).*

*Protecting the Nature of Massachusetts*