May 22, 2020

Permits, Conservation, and Education Division
National Marine Fisheries Service (NMFS)
Office of Protected Resources
1315 East-West Highway Silver Spring, MD 20910

Dear Permits, Conservation, and Education Division:

We wish to request renewal of our incidental take authorization under section 101(a)(5) of the Marine Mammal Protection Act of 1972, as amended, for the take of marine mammals incidental to conducting biological tasks for refuge purposes at Monomoy National Wildlife Refuge (NWR; Refuge), Nantucket NWR, and Nomans Land Island NWR in Massachusetts. These three refuges are managed through the Eastern Massachusetts NWR Complex as part of the National Wildlife Refuge System of the U.S. Fish and Wildlife Service.

In 2020 staff will again census and monitor the presence and productivity of breeding and migrating shorebirds, and other priority species (including seals), using the beaches of Monomoy, Nantucket, and Nomans Land Island NWRs year round. All of the breeding and migrating shorebird activity occurs from 1 March – 30 November. Protection of seal haul out and pupping shorelines occurs year round, depending on the site. Monitoring activities of birds occur nearly daily (on Monomoy and Nantucket) from April – August and is necessary to document the productivity (number of chicks fledged per pair) and population of our protected shorebird and seabird species. Monomoy NWR also participates in several less frequent, but equally important high priority conservation tasks to monitor for threatened and endangered species. These activities include censusing northeastern beach tiger beetles and participating in a red knot migration study during southward migration. Additionally, both Monomoy and Nantucket NWRs serve as vital staging grounds for migrating roseate terns and resighting and staging counts can sometimes interfere with pinniped behavior. Biological monitoring at Nomans Land Island NWR is less frequent, but is likely to occur on approximately 20 days between 1 March and 30 November in 2020.
These described activities are identical to the activities analyzed under the initial IHA, however, the total days that these activities will occur in 2020 will likely be reduced from the 2019 levels, as a result of Covid-19 and restrictions on field work in the early spring.

A report showing the results of our required monitoring from 2019 is attached. Our monitoring results do not indicate impacts of a scale or nature beyond what was previously analyzed and authorized. Mitigation and monitoring measures will remain the same. All monitoring will be conducted by Refuge staff and volunteers. Please feel free to contact me at stephanie_koch@fws.gov, if you have any questions regarding this application or our work in 2019.

Sincerely,

STEPHANIE KOCH

Stephanie Koch
Supervisory Wildlife Biologist