

From: [Darrell Echols](#)
To: [Mike Murray](#); [Britta Muiznieks](#); [Doug McGee](#); [Margaret Carfioli](#); [Thayer Broili](#)
Subject: Re: Fw: AMOY incident
Date: 06/27/2008 09:41 AM

Folks,

From my past banding experience, I have a couple of thoughts regarding documentation of the AMOY incident and permits.

Documentation

1) Since we had an AMOY chick expire under our direction (Shiloh coming to do work at our request), we need to be diligent in our documentation efforts. Shiloh needs to submit to the park a detailed description of the incident that includes why we were conducting the research, where it was conducted, how it was conducted, who were the individuals involved, and what the outcome of the event was. The report should also include any biological data associated with the event such as chick weight, age, condition, etc. It would be helpful to include general description of other efforts associated with the banding of this chick such as its behavior related to other chicks banded on that day or in the past. This report will support the overall need of the project and hopefully support the position that the chick did not succumb as a result of something we did.

2) Any of our staff that were working with Shiloh when the chick died, need to produce a statement describing the event.

3) We need a copy of the protocols and methods that Shiloh utilized during the banding of AMOY chicks. I assume that there is a larger project associated with our efforts that described how and why Shiloh or Ted Simmons are banding AMOY chicks. This project should have an implementation plan or banding protocol associated with it. If this years efforts were a continuation of previous banding work, then we should have a copy associated with his previous NPS permit.

4) Since Ted Simmons is associated with a university, the university would have a review of his project protocols to ensure that they adhere to a set of safe animal handling practices. We need a copy of that review. I suspect that the review would have been attached to the project proposal that he submitted to the park for his NPS permit.

5) Ted Simmons will need to send a report to USGS for the banding permit, NC for the state research permit, and likely to the university. The banding reports are due annually, which may not be for several months to a year from now depending on when the permit was issued. We need copies of these reports when they are submitted.

6) We need copies of Ted Simmons current state and federal banding permits.

7) We need to draft a couple of paragraphs describing the factual nature of the event and that we are investigating and have suspended AMOY chick banding efforts pending the results of the investigation. I believe that Mike has already tasked Thayer with accomplishing this. We will use this language to the resource management report.

Banding is stressful for any bird that is being processed and the risk of injury or death exists regardless of a birds species, age, or sex. Since a bird being banded would not typically be subjected to these stresses, we need to ensure that our practices are appropriate and that we minimize the potential risk to any bird captured. I know you know this, but when we talk to Ted Simmons or Shiloh we need to assure them that we are not trying to accuse them of anything but rather just document their experience, qualifications, and the events that occurred. The potential exists that we will see some community interest in the death of the AMOY chick and we need to be able to answer the questions and concerns posed to us.

Permits

The park needs to issue an NPS research permit for any activity undertaken by non-NPS personnel if it involves handling animals, collecting data, ground disturbance, affects to visitor experience, or other actions. The NPS permit is to be issued to university, state, federal, non-governmental, or contract personnel and the permit request should be supported with a project proposal and copies of necessary state or federal permits.

I understand that Shiloh was requested to come to the park and assist us, but we still need to issue a permit. This will help us ensure that we take into consideration the projects appropriateness, compliance, consistency with other permits, and personnel qualifications. In the future, let's issue permits for any project that we request assistance. For projects that we undertake as part of our desire to obtain information on park resources, should be permitted as well. This will ensure an adequate administrative record, development of protocols, management of data, and appropriate reporting of the results.

Park Banding Permit

I think the park should obtain it's own banding permits from the USGS, the state, and if appropriate FWS. The federal banding permit is a fairly easy process to submit, but takes a while for USGS to process. Applications can be obtained on-line and letters of support can be obtained from our previous partners or professors. It will involve a detailed resume and description of previous banding, research, or natural resource educational and professional experience. I don't know what the state process is like, but I suspect that it is similar to Texas, which was pretty easy. Generally the information that you gather for one permit relates directly to another permit, which minimizes the documentation workload.

I would suggest that the federal banding permit include all possible projects that we might want to undertake regardless of the likelihood of accomplishing the project. For instance, we can request AMOY only, but it would be more efficient to request shorebirds including PIPL even though we currently are not permitted to handle PIPL. The permit request could also include neo-tropical migrants. Waterfowl, raptors, and hummingbirds will require different permits and I would not suggest requesting those since they require specialized experience.

There will need to be a single permit holder for the park, but we can add additional staff as sub-permittees. I would suggest that Doug be our principal permit holder if his educational and professional experience includes banding. The permit fee can be waived as a government agency.

We need to also look into necessary permits for transport, salvage, and educational use of bird specimens if appropriate. If you need any help, please do not hesitate to call me.

Darrell

Darrell L. Echols
Deputy Superintendent

National Park Service
Outer Banks Group
Cape Hatteras National Seashore/Wright Brothers National Memorial/Fort Raleigh
National Historic Site
1401 National Park Drive
Manteo, NC 27954

phone: (252) 473-2111, x148
fax: (252) 473-2595

E-mail: Darrell_Echols@nps.gov
Webpage: <http://www.nps.gov/>
