

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 1

Author Information

Keep Private: No
Name: susan butelli
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
sayville, NY 11782
sayville, NY 11782
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 3:

The only item I read in full was the Wilderness Stewardship Plan, which I thought was excellent. I do not have time to read the full, 485 page draft right now, but I'm sure it includes many well thought out plans for improving our beautiful Fire Island.

Comments: I am thrilled to read that there is a General Management Plan for Fire Island. I am saddened that I have not heard - in the overviews I have read - any mention of the Talisman/Barrett Beach area. Since the Town of Islip gave this treasure over to the National Seashore, it has done nothing but deteriorate. Those of us who spent our summers there for the last 40 years are not wealthy Fire Island homeowners, we do not own big yachts, we can't afford slips at Watch Hill or Sailor's Haven, but we do live 15 minutes across the Bay - and feel cheated by what we have lost. I think back to the clean, litter-free picnic area on the bay side at Talisman - with a small floating dock so families could conveniently unload. There was a gentleman who was employed to keep the place in top shape. Obviously, FINS philosophy of carry-in, carry-out has not done the trick there. I look at the huge dock that FINS built at Barrett which becomes more useless each year. I look at the risk being taken by the families that continue to go there - and let their children swim with no lifeguards. What happened? Why has FINS let this treasure become so neglected? Shouldn't the average local folks have a clean, safe place to go to on Fire Island? I see many dock slips in Sayville/Bayport that are empty this year. Maybe after a few trips over to Fire Island they have been too saddened by what has happened. I brought my five year old granddaughter to Talisman last week for the first time this year. All I could think of were the wonderful memories we had there with her Mom many years ago. As we sat eating our lunch with the smell of a rotting dead swan nearby, and debris all over, I decided that we will never go back. Robert Moses is looking mighty good.

So, my request is for some attention to this beautiful section of Fire Island. Clean up the bay side of Talisman and Barrett. Get rid of all the debris that is on the shore and in the bay waters. Bring back lifeguards to Barrett - at least on weekends. When I look at the figures, in the millions, for the various alternatives for the GMP - what I am requesting is a drop in the bucket. And it would make local folks with small boats happy for summer again.

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Correspondence: 2

Author Information

Keep Private: No
Name: Joseph P. Griffith
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Yonkers, NY 10704
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

A 486-page document is a lot to wade through. I will look it over as time permits. Meanwhile, I wanted to get the comments below on the record.

Topic Question 2:

Please see below.

Topic Question 3:

Please see below.

Comments: In response to the proposals to maintain recreational fishing opportunities on the Fire Island National Seashore, specifically the ocean beaches, I would like to propose designated areas to which fishing would be limited. Specifically, I believe the westernmost end of the island would be best suited for fishing, since swimming is generally not permitted there. People can routinely be observed fishing just beyond the lifeguarded areas of Robert Moses State Park, where swimmers congregate. I have observed them firsthand on several occasions catching large fish, large enough to be dangerous to swimmers. The most recent occurrence was on July 5, 2015, when a fisherman along the beach perhaps 200 yards west of the entrance to the lighthouse caught two sharks, one almost as large as he, and then released them. This incident was observed by numerous people who stopped to watch him struggle with and catch them. Fishing and attracting sharks to an area where swimmers are obviously ought to be prohibited, but no such rules exist. I have also observed bass, skates and stingrays, caught by fishermen or dead and washed up on the beach, and sometimes photographed them. The level of danger varies but is present nonetheless. Also, on one occasion, a careless, inconsiderate fisherman discarded a hook on the beach, which I managed to find when it became embedded about a half-inch into my foot, creating a bad infection that lasted weeks. To reiterate: I do not believe fishing should be allowed where people swim.

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Correspondence: 4

Author Information

Keep Private: No
Name: Kenneth Mitchell
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Holtsville, NY 11742
USA
E-mail:

Correspondence Text

To Ms. Ellen Carlson

I am writing to you concerning the Fire Island General Management Plan. I understand that funding is a major concern over what measures can be undertaken for the future of Fire Island National Seashore.

My comments concern the William Floyd Estate property. Presently I feel the Park Service is only doing the minimum to maintain the Home. I believe this is a great disservice to the community and the legacy of a founding family of the Mastic area and the country.

Alternative B should be the only Plan implemented, however, I realize funding probably won't allow this. If this cannot be done I would like to recommend the following suggestions:

- 1) The entrance at the parking lot should be made more inviting and attractive. The first view you see on entering the lot are the bathrooms. A small building or pergola should be built utilizing the existing bathrooms. There could then be information posted on the various sites available at the Estate.
- 2) A gravel or pea stone path could be placed leading from the wooden walkway to the house. I know many people visiting have a fear of getting bit by a tick if the grass is high.
- 3) The Estate has many artifacts in the Curatorial Storage Building which are unavailable to the public to view. There should be display cases showing some of these artifacts.
- 4) The back buildings should be painted and repaired to show how the Estate operated in the past.
- 5) The Cemetery area should have more information on those buried there and how their lives interacted with the Floyd Family.
- 6) There should be more communication with schools and historic societies informing them of the historic treasures at the Home.

I feel the biggest problem is that it seems the present administration does not fully support the Estate and treats it as an afterthought. In prior years a Museum Curator, Steve Czarniecki, was in charge of the Estate. Presently, no one at the Estate has any formal museum or historic preservation education.

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The two Rangers who work there, Mary Laura Lamont and Denise Steinmacher, are doing an excellent job but they do not have enough hands or time to do all the work they would like to do. They clean the house, prepare programs for the public, set up exhibits, train and supervise docents and give tours. There are also very dedicated docents who help make the tour of the house enjoyable and interesting for the public.

When Mr. Czarniecki was in charge he always was able to provide museum aide positions in the summer. I know three of the previous interns have all received Bachelor degrees in Historic Preservation and two have Master degrees in Museum Studies. None of these people were offered positions at the Estate and two were told to look elsewhere because no positions would be available. However two people have since been hired with no formal experience.

One of the interns now has a permanent position at the Smithsonian in Washington, DC and the other two are working for Prince William Co., Virginia. One is an Acting Site Manager of Rippon Lodge, a home older than the Floyd Home and the other a historic interpreter at Ben Lomond Historic House. The latter two also work at the US Marine Museum in Quantico, VA. These people have valuable knowledge, experience and passion for their work who could have been great assets to the Estate but are now lost due to the shortsightedness of the administration.

This is why I think the William Floyd Estate has not met its full potential as a location that draws people to such a valuable part of history. Unfortunately the best solution would be to make the Estate its own entity and have its own staff but that will never happen.

If you have any questions I can be reached at the above address or by phone [REDACTED].

Thank you for giving me the opportunity to comment on the Park Services' Plan.

Sincerely yours,
Kenneth Mitchell

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Correspondence: 5

Author Information

Keep Private: No
Name: MaryLaura Lamont
Organization: FINS, WILLIAM FLOYD ESTATE
Organization Type: I - Unaffiliated Individual
Address: (mailing)20 Washington Ave. Mastic Beach, N.Y.11951
Mastic Beach, NY 11951
USA
E-mail: MaryLaura_Lamont@nps.gov

Correspondence Text

Topic Question 1:

I like the fact that in the existing parking area the bathrooms will be added onto to provide a classroom and visitor center. That's great. However I am very concerned about "recreational opportunities" on the land. This opens up the Estate to indiscriminate recreation, including just about everything. It should be for passive use only such as birding and hiking. Who will decide what is appropriate for this site? Why do so many sites have to have everything in them for people to recreate? This is a historic sight. We should not be thinking of campgrounds, canoeing, who knows what else. We should be thinking of the animals and birds - this should be a sanctuary for them as it was when the Floyds were here. It is why bald eagles have finally returned to the Estate. If it were to be for increased "recreationally use" (and who knows what a manager might decide as "appropriate") they would not be here as nesters.

Topic Question 2:

For what this is worth I will include it anyway. Not one mention is made in the booklet mailed to me about the Curatorial Storage Facility, which is a dynamic, wonderful structure that houses the burnt of the artifacts, mostly Floyd but also FINS artifacts. Only the maintenance facilities are mentioned and that the NPS will develop a consolidated facility all within one structure. What has happened to the fact that the Curatorial Facility was to be expanded? We were always told it would be but I see nothing of that in this booklet, only that a consolidated maintenance etc. would be done. The state of the art curatorial facility, built with dedicated funds in 1996 to house precious artifacts must be mentioned in the GMP and should be enlarged to house the rest of the artifacts. That should be a very high priority since we are a historic site and it would significantly improve the preferred alternatives for the Estate and increase its purpose as well as its understanding in relation to the local, regionally, nationally and global contents you speak about.

Topic Question 3:

There is no way you will be able to "rehabilitate" the corduroy road (why would you want to unless you will be having boats here) as it is in the marsh near the end of the property. Rising sea levels will destroy it again and we in the process of building it anew will destroy the habitat of the rare nesting birds in the marshes, which are already under threat. Reinventing the "lopped tree fence system" will only take 100 years (we will all be dead). This is a very stupid idea as it is time intensive. The introduction of crops in certain fields? Who is going to do all the maintenance in the fields? Are all the animals who eat crops going to be shot and killed? The gardens? Orchards? Where is all the money coming from to do all of this?

Comments: I see that the managers of the GMP process have picked the Management Alternative B for the WF Estate. No where is a "cultural preservation" mentioned so I see that the managers have decided to place the importance on William Floyd and his descendants. It completely ignores his forbears who enabled him to be who he was. The major selling point of the Estate is the fact that it is a Cultural Preservation" of 8 generations, not just William Floyd.

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Although important in history and a major talking point in the house it is the whole story that is the catch here and always will be. Everyone who visits tells us that-how unique this place is not just because of him but because of the long occupancy of the same illustrious family.

Although we are not be in the business of improving local economies the NPS does just that.It would be great if there were nice restaurants folks could go to within Mastic Beach when they visit here,but none exist within the struggling Town.

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Correspondence: 6

Author Information

Keep Private: No
Name: Robert LaRosa
Organization: Fire Island Lighthouse Preservation Society, Inc.  Official Rep.
Organization Type: P - Conservation/Preservation
Address: 4640 Captree Island
Captree Island, NY 11702-2601
USA
E-mail: programs@fireislandlighthouse.com

Correspondence Text

The following are comments for consideration in the draft General Management Plan for the Fire Island National Seashore from the Fire Island Lighthouse Preservation Society:

- - Expand interpretive experiences at the lighthouse to include all aspects of Fire Island History, including the Radio Annex and artifacts in park collection.
- - Improve lateral boat transportation from Fire Island communities through the use of NPS Lighthouse Dock by permitted commercial vessels.

Regards,
Robert LaRosa
President

cc. Chris Soller

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Correspondence: 7

Author Information

Keep Private: No
Name: Kevin N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Ronkonkoma, NY 11779
USA
E-mail: [REDACTED]


Correspondence Text

Topic Question 1:
Progress is good, the times have changed considerably since the 1970's

Comments: I didn't see that personal watercraft (3 person wave-runners, etc.) were specifically addressed in this proposal or any reference to the restricted use they are currently under. I would like to see the dated ban on these machines reviewed and amended to allow access to the park just like a boat. These vehicles are a low cost, environmentally friendly option for a small family to utilize the resources at FINS. They are very different from the emerging technology of the 1980's and 1990's where they were loud, 2 cycle pollutants and "new". They are fuel efficient, quieter (than early models), more affordable. As long as there are rules that are followed, I see no reason why they can not be included in this proposal.

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Correspondence: 8

Author Information

Keep Private: No
Name: John T. Tanacredi, Ph.D.
Organization: CERCOM at Molloy College  Official Rep.
Organization Type: A - University/Professional Society
Address: 132 Clyde Street
West Sayville, NY 11796
USA
E-mail: jtanacredi@molloy.edu

Correspondence Text

Dear Ms. Carlson:

Please find attached one of several annual reports regarding the cooperative agreement between Dowling College and the Department of Earth and Marine Sciences who from 2002 to 2012 conducted water quality monitoring for Fire Island National Seashore (FINS). The Draft GMP does not adequately assess water quality in general, however to not note its own efforts to conduct water quality monitoring or recreation management, is a considerable omission. Water Quality in Great South Bay, from boat pump out stations impacts on bacteriological conditions at boat docks over seen by the FINS/NPS, (National Park Service), to changes in water quality and its subsequent impacts on GSB (Great South Bay) overall ecological health from the breach at the Old Fire Island Inlet area due to Superstorm Sandy in 2012, (page 127, DGMP) reveals considerable deficiency in the overall natural resources assessment process of NEPA and related environmental protection regulations in this GMP Draft.

In addition, specific attention to a species that FINS formulated special protections by preventing harvesting Horseshoe crabs (*Limulus polyphemus*) within the FINS boundary is a significant natural resource management accomplishment. Little discussion was noted and significant attention to mosquitos and ticks was provided. As a matter of fact, on page 187 a Park Service Ranger holds a HSC, yet there is no reference to *Limulus* in the text or reference to their interpretation, environmental education or protection. There is generally little coverage or attention to the robust and considerable applied research conducted at FINS over the years since the Original GMP was prepared. This present GMP update needs to exhibit the level of investigations conducted by a prestigious and varied number of scientists, academicians and natural resource specialists over the years since the original GMP was prepared to adequately assess potential environmental impact to these resources.

Thank you for your consideration of these comments.

Sincerely,
John T. Tanacredi, Ph.D.
Director of CERCOM
Professor of Earth and Environmental Studies

Enclosure [NPS/FINS and Dowling College, Department of Earth and Marine Sciences - - Summer Water Quality Monitoring Program 2012 - - Final Report. - - ATTACHED]

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Correspondence: 9

Author Information

Keep Private: No
Name: Judy Corcoran
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Fair Harbor, NY 11706
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 3:
I support non-lethal birth control to manage the deer population. Maybe eating deer meat should be disallowed so that the birth control can be injected. I also support treating the deer with Frontline to prevent the spread of ticks.

Comments:

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Correspondence: 11

Author Information

Keep Private: No
Name: Regina Lento
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Patchogue, NY 11772
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I'd like to see Fire Island preserved in a pristine manner to save it from further development to be used to protect species and save what little undeveloped seashore that's left for posterity. The public and the affluent have more than enough "playgrounds" and the fisherman have depleted natural resources sufficiently where there needs to be some sort of preservation model put in place to restrict further depletion of resources and wilderness. If the NPS wants to start cracking down on loopholes that the local towns and villages have slipped in, I agree that it is to the best interest of protecting the environment to further restrict these activities. The public and the affluent will have to respect the environment and go to places already developed to vacation and buy up property. Go fix up run down communities and improve them instead of eating up what little open space we have left. Like the OBX, if a property falls to a storm, it does NOT get rebuilt.

Topic Question 2:

I think the NPS could further employ the use of volunteers and public who seek to assist in the role of preserving species and resources. If money is an issue, seek fundraising support from the community and don't be shy about requesting donations and or charging for the use and maintenance of federal parks.

Topic Question 3:

I think proposals to restrict development, educate the public, restrict stripping of resources such as fishing, crabbing and clamming, using restoration projects to fix environmental damage to flora and fauna are the way to go. Heavy fines and potential prison time for breaking laws put in place to protect the environment and the wildlife should be considered to discourage scoff laws. Local law enforcement should be in a supportive role when NPS officers and park rangers need assistance with enforcing National Park rules.

Comments: It's a shame that what works in other states doesn't work in NY. NY should spend more time fixing up what's decaying rather than mowing down and destroying the environment that's left. The NPS needs more authoritative power to enforce their plans to save the precious lands we have left.

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Correspondence: 12

Author Information

Keep Private: No
Name: Scott T. Parris
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Patchogue, NY 11772
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

With a focus on Fire Island, I enjoy seeing the alternatives that promote public access. Although I believe the committee was correct with not endorsing a reduction in the size/scope of Watch Hill, I believe the opposite approach should be taken. By expanding use of the island, perhaps the public will appreciate what it has to offer. Also, additional revenue could be used to improve the island.

Comments: With the original creation of FINS, I believe it was proposed that one additional inlet be created. That never happened. Mother nature has now done that for us. The bays of the south shore, near the breach, have never been cleaner. People are enjoying the bay more than ever. The ocean is flushing new life into the bay. We need more of this! While I don't expect to see additional inlet being created, there have been suggestions in the past with regard to "flushing pipes." Run under the Island, they could allow an exchange of bay and ocean water. This would greatly improve the water quality in the bay, and the health of our wetlands. In the end, this would improve our storm protection, public health, and marine life in the area. Furthermore, with the breach being such a positive element, effort should be made to stabilize it. The breach should remain open, be accessible to marine traffic, and continue to reshape the wilderness area. The area around the breach has grown tremendously, and has reinforced fire island for years.

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Correspondence: 13

Author Information

Keep Private: No
Name: Mark S. Andres
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Sayville, NY 11782
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

The breach at New Inlet needs to remain open. I feel that a hands off approach used to this point is the most beneficial. If it fills itself in; so be it. Let nature takes its course.

Comments: As a boater on Great South Bay for the last 40 years, I can personally attest to the benefits this breach has brought to the bay. Cleaner water, more fish, more and thicker (happier) clams. Back in the late 70's and early 80's while digging clams while in College, I could see my rake head on the bottom in 10-12 feet of water. That has not been the case until recently. This breach is helping flush the brown tide, the algae blooms, and the dirty water from run off. Everything man has done to harm this body of water, this breach is helping to correct and minimize. It would be a huge injustice to the health of the Bay to close this Breach. Thank you; Mark Andres

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Correspondence: 14

Author Information

Keep Private: No
Name: susan martin
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Brookhaven Hamlet, NY 11719
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
Leave the breach open.

Comments: I'm not sure why people object to leaving the breach open. The Great South Bay has been revitalized. Scientists have stated that tide heights have not increased. I say leave it open and let nature take it's course, whatever that may be.

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Correspondence: 15

Author Information

Keep Private: No
Name: Robert Spencer
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York City, NY 10012
USA
E-mail: [REDACTED]

Correspondence Text

TO: Ellen Carlson
Chris Soller September 2, 2015

Ellen and Chris -

I went to the NPS website and started to fill out the electronic form, but I found that an accidental tap of the screen, made two lines of text disappear and it discouraged me from ever finishing my comments. Thus I revert to E-mail with Chriss copy to be dropped off at the office in Patchogue.

Basically I admired the draft GMP and EIS report where public comments end this September 17th. While I am currently Executive VP of the Fire Island Association and have been a director of same since spring 1962, my comments do not reflect the official opinions of the Fire Island Association. Neither might they reflect the official opinions of the Davis Park Association, where I have been a member since 1957, and now am a VP, and once was President from 1970-1977. I was once an FIA plaintiff with George Biderman, in a legal effort to get the first GMP published, which was finally done in 1977.

All views expressed in this letter are my personal observations and opinions flavored by 53 years of seeking good relations living within a Seashore.

This has been an extremely busy summer for me personally, what with a two years of threatening legal action against my being able to keep my house built in 1957 in Davis Park, but I am compelled to get a few thoughts out to you before the first commentary deadline of Sep. 17th.

Let me point out pages of high interest to me that may merit some further alterations in your long-term planning efforts since 1978. In general I applaud your new partnership approach to including more thoughts and concerns of the many private owners within the boundaries of the Seashore. Bravo on that. They were missing that approach in the first GMP.

With that said, I would like to state how owners felt about the perspective of the situation in the spring of 1962 after an enormous advent of severe weather threatened the existence of this barrier beach and the efforts of certain land-use planners of that day who were proposing a four-lane parkway to act as an erosion barrier down all of Fire Island. The FIA fought that notion - shunning overriding highways that would open more private development than public recreation, and won that battle. The response of the FIA and mainland friends was to seek to be more like Cape Cod, and the quest for a Seashore was also joined and we had a choice of three bills before Congress. One was accepted and we hoped for a partnership to protect and preserve an underdeveloped Fire Island. We also hoped for some long-term help in erosion control, but didnt realize that the communities would not find much NPS interest in communities at that time. We are happy that there is some new interest in

working together. On the other hand there remains throughout this plan language that sounds as if the 17 exempt communities were expected to strictly follow the major pronouncements of the US Department of Interior - - without exception. Maybe we feel that certain shorebirds are now even more exempted than human residents.

But we do understand that we residents are few in number, and without the financial resources to examine, and propose millions of dollars to counter with a GMP from our point of view.

Some specifics

n 1. Pages 26-27 - A program related to the GMP is considered to be the FIMP reformulation study that covers all of the south shore of Long Island from Fire Island Inlet to Montauk Point, which -in the end - must be mutually acceptable to USACE and the Secretary of Interior. As all know this has been a labor of love for many, many Fire Islanders and governmental agencies for over 50 years without mutual acceptance but with a FIMI alternative offering small to moderate erosion control work in Fire Island Islip communities and connecting Seashore land, along with limited community-only work in Brookhaven communities. FIMI is meant to last for ten years maximum, and has no real nourishment maintenance program involved. Any possible future projects would have to be agreeable to US Interior and partially funded at least by the communities via taxes. The more important FIMP plan will be more years of negotiated planning, and will include shared taxation funding, while FIMI has been funded by federal taxes.

On page 27 there is a note concerning what is called the Tentative Federally Supported Plan (TFSP). It states there that should the FIMP be approved and adopted, its provisions would take precedence over the approved GMP, which is up for approval here. RS comment - This seems fair and a good thing, but memories of the difficulties in gaining FIMP agreements over 50 years indicate thousands of hours of negotiations are ahead here to get approval over what the FIMI short-term stabilization project offers. This is a huge process, where government jurisdictions have budgetary superiority. It will take many devoted volunteers, and fund raising by communities and the Fire Island Association. I see current obstacles to ever being able to get a human-resident FIMP plan approved.

n 2. Page 38. This page introduces Their Management Philosophy and their Resource Management which lists three key elements - Partner with the public, Provide for stewardship&, and management decisions .. are based on scholarly and scientific information, etc. RS comment - There is a definite movement from 1977 to incorporate Fire Island communities into the planning and future management decisions. I see stewardship as a strong cultural motto for the future, where the communities - and individuals - - will be asked to assume more responsibility for the future. They should. But, well have to see just how much partnership interprets into the philosophy of stewardship. The planners have invested huge time and resources to get where they are.

n 3. Page 39-42. Section titled Responding to Climate Change. There are many references throughout this draft that indicates that a large number of decisions and opinions expressed in this GMP show strong belief that the sea is inevitably rising and all shoreline management decisions will be framed in that attitude. RS comment - I agree that Climate Change is a huge question, but I see scant options for humans to try and fight the consequences on a local basis, and thus find this working to establish harsh obstacles that just will be impossible to overcome for the small communities.

n 4. Page 42. This introduces Management Zoning which is clearly described as something of very much more future attention. In fact this GMP draft even includes the current Zoning Standards which we can expect to be of very great interest to negotiations between Islip, Brookhaven, Ocean Beach Village, and Saltaire - all of which have separate zoning regulations. It is also quite clear in various references within the draft that zoning enforcement has become of very great interest for future discussion. RS comment: We have been told that each community will probably have slightly differing zoning activities allowed in community development zones that retain a communitys special nature. This will become a very important aspect of each communitys activities along with the Towns and State in my view. Considering what was pointed out above, I see people languishing and nearly giving up trying to secure a full FIMP. Thus it could be a force driving away interest in becoming stewards.

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n 5. Page 58 - 60. This can be considered an important start to the more informative sections that deal with the entire draft GMP. On page 58 starts the various discussions on Shoreline Management. Starting of page 59 and into it shows the primary tenets of the TFSP referred to above, with paragraphs on Barrier island processes, Beaches and Dunes, Ocean Sediment Transport, Cross-island Sediment Transport, and Seek effective enforcement of Coastal Erosions Hazard Area n(CEHA) Act. This last section shows that FINS aims to make the CEHA zone and it current dune district co-terminus. The GMP planners thus expect NYSDEC to become the enforcement agency for the new CEHA zone and their Perpetual Easements, required for the FIMI project now under way. These are important pages to understand.

n 6. Page 63 and page 66. One should read the first paragraph atop page 63 as it leads into using condemnation authority. Then read the last paragraph on page 66 dealing with Land Acquisition. Then head for another important section starting on page 72.

Pages 72 - 73 . This is headed by a simple statement - The NPS would assume a leadership role in working with Fire Island communities, the towns of Islip and Brookhaven, Suffolk County and New York State to develop a coastal land use plan for Fire Island. The plan would address shoreline protection, land-use controls, site planning, and design standards, and post-storm response in the contact of the dynamic barrier environment and emerging trends resulting from sea-level rise and climate change. This plan must be undertaken and adopted as a multi-lateral, collaborative effort. The plan would be consistent with the Tentative Federally Supported Plan (TFSP)& RS comment - - The rest of page 73 is surely considered one of the most important sections to be adopted in the entire GMP.

n 7. Pages 74-75. Here it is stated that the Seashore would work with all parties to revise the Secretarys zoning standards, and would revise Land-use regulations (and) articulate the standards to be met for a variance, outline a clear review process, and clearly describe how inconsistent developments would be addressed, It proceeds to state that NYS law explicitly states that it is permissible to remap the CEHA & and that federal law would likely not permit and kind of remapping of a dune protection measure based on any kind of accretion event; as such an event would undoubtedly be temporary in nature. RS comment - It is obvious from reading this GMP, and hearing/reading whats being discussed, that the NYS CEHA laws will one day be enlarged to cover the bayside.

n 8. Pages 76-78 broadly discuss the need for establishing a new mode of cooperative stewardship which would include the re-establishment of the Fire Island National Seashore Advisory Commission. Also on page 77 it mentions the need to create a Fire Island Management Partnership. Atop page 78 appears the list of three legislative requirements to achieve these goals. RS comment - I view the NSAC an excellent idea in bring it back, but would have concerns that the communities would once again feel in a large minority of influence in having any say in where they actually are residents.

n 9. Pages 85-92. These pages put forth the basic NPS Preferred Alternative (Number 3) that is discussed in text of moderate detail. RS Comment-I can accept that NPS gain the Alternative they prefer through limited negotiations, and with the improvement of the belief by residents and other Stewards that they have a better chance for the ability to go beyond just gaining shorebird habitat in their efforts,.

RS - Conclusions - - Our Villages and hamlet communities should prepare for needed stronger attention to the new aspects of overall shore and land management. Having been personally part of long-standing FIMP negotiations over many decades, and alert to the FIMI (FIMP preamble stabilization) project, this effort will take a level of citizen-heroism. We can hope for new citizen involvement, but we can expect less and less average citizen involvement now that FIMI is showing that condemnations are inevitable long-term with Perpetual Easements being used along with Eminent Domain procedures, and without any urgent understanding of how island-wide maintenance erosion-control planning could succeed in the six miles only for communities on an island of 32 miles long within a reasonable time of two-three years. We can hope.

Personally, I am a supporter of your planning efforts and wish you - and our communities-all good luck.

Bob Spencer

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Copies to my FIA officer and director list

Fire Island residency [REDACTED] Davis Park, NY (via 11772) [REDACTED]

NYC residency [REDACTED], NY, NY 10012 [REDACTED]

[REDACTED]

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 17

Author Information

Keep Private: No
Name: Jared Della Valle
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Brooklyn, NY 11201
USA
E-mail:

Correspondence Text

Topic Question 1:

I prefer Management Alternative 3. I am eager to have a more uniform approach to land development as it pertains to post storm recovery and disaster management. This includes both physical structures and shore management (beach re-nourishment procedures). I believe that any planning or management needs to recognize the existing context (Human Use) with the need to be good stewards of the environment. Our diverse community of individuals needs to learn how to be more thoughtful about the special and unique qualities of our seashore while we recognize climate change.

Topic Question 2:

As an ocean front homeowner that has suffered through significant damage from Hurricane Sandy, a unified approach to development and reconstruction is required. Homeowners need a single source with which to interface that has jurisdiction over the entirety of the island that provides for consistent zoning regulations, reliable compliance standards and progressive and forward thinking sustainable building practices. I believe there should be performance based criteria for reconstruction with audit-able compliance requirements for natural resource consumption. Structures that are renovating, rehabilitating or reconstructing that exceed 50% of their assessed value should be forced to comply with both FEMA requirements AND progressive sustainable practices. Additionally shore management practice regulations for beach re-nourishment should be reliable. It seems that each and every storm or re-nourishment project is a mystery. Property values are hindered by this lack of reliability.

Topic Question 3:

Other jurisdictions (NYC) that support private development on public land have alternative structures for taxes. PILOT Payments (Payment in Lieu of Taxes) could be implemented and would support specific infrastructure expenses, management expenses, and streamline and clarify the parks development going forward. It seems that the jurisdictions that govern fire island are all resource constrained and myopic in their approach. A single source of management would better serve the community and the special natural resource.

Comments:

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 18

Author Information

Keep Private: No
Name: Jaimy Honig
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Ocean Bay Park, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I favor the 3rd OPTION where residents, tourists and the Ecosystem can co-exist and prosper with continued updates and improvements as situations dictate.

Comments: • I read that Fire Island has a maritime forest ecosystem of old growth and it runs from around Point O' Woods to Davis Park and it is only one of two such forests in the known world. I think this makes Fire Island the most significant park or place anywhere in the USA and as such, the NPS should never abandon Fire Island or ever let it fall into ruin. It is a national treasure and deserves to be treated as such - Congress should continue to fund the Fire Island National Seashore and increase its budget so it may take a more aggressive role in the maintenance program of its infrastructure.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 19

Author Information

Keep Private: No
Name: Peter M.R. Kendall
Organization:
Organization Type: I - Unaffiliated Individual
Address: Unknown
Fair Harbor, NY UNK
USA
E-mail: [REDACTED]

Correspondence Text

Dear Superintendent Soller,

My family and I have been summer residents in Fair Harbor, Fire Island since 1976 and we purchased a house there in 1978. I think it is fair to say that we (my children and grand children) are all passionate about the unique blend of nature and community that exists on the Island. We are also aware of the unique blend of Federal, State, Local and private governance of Fire Island that resulted from the formation of FINS in 1964.

We believe that the draft GMP for FINS laid out the various alternatives in a credible and thoughtful manner and wholeheartedly support Action Alternative #3 as the way to go forward.

We appreciate the opportunity to express our support for this Alternative and please feel free to contact me on this issue if necessary.

Thank you and kind regards,

Peter M.R. Kendall

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 20

Author Information

Keep Private: No
Name: Michael DeLetto
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Ocean Bay Park, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

• I agree with management alternative 3 because it recognizes that I exist and that my family intends to exist on this island for generations to come, and I want the Park Service to consider the impact on my community when the planning evolves into actions.

Topic Question 2:

Beach replenishment is an affordable and effective way to sustain our communities and should be utilized on a regularly scheduled basis rather than the responding to disaster methods used in the past. Contrary to the popular belief, the trenching left by offshore dredging creates marine ecosystems that are far more diverse than a flat sea bottom. As an avid fisherman I have seen the results first hand.

Topic Question 3:

The removal of the beachfront homes in my community, Ocean Bay Park, is a big mistake. I have photos from the 1960's & the 1970's to compare the modern state of the beachfront with these past landscapes. I can clearly see how the dune and beach structure could easily be restored and sustained to that condition without destroying the dream homes of 19 families in our community. My home is 3rd in from the ocean, and it is likely that the structure provided by those homes saved my house in hurricane Sandy.

Comments:

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 21

Author Information

Keep Private: No
Name: Laura Starr
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10013
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
As a landscape architect addressing post-Sandy resiliency in NYC, and as a homeowner at 38 Champlain in Ocean Bay Park, I urge you work with Option 3- -which it sound like you are. It is clearly possible to have an evolving co-existence of human settlement and nature on Fire Island. People need to be better educated and informed, and policies need to be put in place to protect the natural resources of the Island, including the sand bar itself. It is fabulous that there are so may diverse towns on the Island, and that in between them are places of respite like sunken forest.

Topic Question 2:
Why not try to expand the planting and feel of the maritime forest by doing a vegetation master and management plan for the less settled places on the island? There could be a guide for property owners about native vegetation that is sustainable, doesn't require irrigation, and would contribute to the natural continuity/integrity of the island.

Topic Question 3:
I do think the one difficult thing is that as the beach erodes, there are so few opportunities for sand to be deposited on the Bay side. Not sure what can be done about this.

Comments: I would like to assist you however i can:
[REDACTED]

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 22

Author Information

Keep Private: No
Name: Edward R. Eschmann
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Ocean Bay Park, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I have been a homeowner and business owner in FI for over a quarter century and I am in support of Alternative Plan 3 that recognizes and combines a management plan of the natural resources and human interaction that Fire Island has been about for many past generations and should continue for coming generations. I am in support of the FIMI dune project is long in the making and will assist in protecting not only FI but the mainland Long Island just north. Past projects were always temporary and this project appears to be a long term solution. I am in favor of proactive management of our communities by the community of people living here with input from the government agency that will help serve the better good of the community and people who consider FI an important asset to our lives.

Comments:

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 23

Author Information

Keep Private: No
Name: Alexander and Jane Brash
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Point O' Woods, NY 11706
USA
E-mail: [REDACTED]

Correspondence Text

September 10, 2015

Ellen Carlson
Fire Island National Seashore GMP
15 State Street
Boston, Mass. 02109

Dear Ms. Carlson,

As a third generation owner and year round visitor to Fire Island, we strongly support Cooperative Stewardship and Management Alternative 3, NPS's Preferred Alternative. We believe that Fire Island's future should continue to meld the beautiful natural resource aspects of the island with its rich cultural history.

As a point of fact, it was not external influences that preserved the initial slice of Fire Island, now known as Sunken Forest, and donated it to the NPS in the early 1960s, it was an alliance of residents. Fire Island's residents have long had a history and tradition of caring for the island. In the tradition of the Gullah/Geechee Heritage Corridor, Cumberland Island, Cape Hatteras, or Assateague, we believe the people, history and culture of Fire Island are intrinsic to its nature. With a past replete with pirates, whalers, salt hay reapers, sailors and more, and today residents' barefoot existence, reliance on wagons and bikes, distinct communities, and traditions of volunteerism, the island's unique cultural nature is self-evident. In addition, as one of the earliest National Park sites established with a goal of sharing its resources with the urban residents of the Northeast, the continued existence and support of these communities, and thus their ability to facilitate and host visitors, is critical to this latter concept.

In such light we strongly support the continued protection of, interpretation of, and the sharing of the island's great natural resources with the public. We also and equally support retaining and even improving the human infrastructural elements that characterize the island's current communities, including support for FIMI, FIMP, wastewater treatment, and bayside shoreline restoration work at Sailors' Haven and in the communities.

Sincerely yours,

// Alexander R. Brash //

c. Chris Soller, FINS Superintendent

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 24

Author Information

Keep Private: No
Name: UNK UNK
Organization:
Organization Type: I - Unaffiliated Individual
Address: UNK
Fair Harbor, NY UNK
USA
E-mail: [REDACTED]

Correspondence Text

Hello. We are homeowners in Fair Harbor, Fire Island, and are writing in support of alternative #3 of your management plan. I have been coming to Fire Island since 1947, and am familiar with the history of it becoming a park. At that time, Robert Moses wanted to establish a 4-lane highway down the center of the island and so the homeowners petitioned to become a national park with the understanding that it would combine the natural part of the island with the existing communities. We still support the concept that people and nature can peacefully coexist, and hope that Fire Island will remain that way. We are now in our 80s, and although younger people can enjoy parks with hiking, camping, canoeing, and so on, we enjoy the sand and the sea, the road-free environment, and the general beauty of Fire Island only by having homes here. We hope you will continue the current situation where there are residential communities on parts of Fire Island, and unbuilt areas elsewhere. Thank you.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 25

Author Information

Keep Private: No
Name: Heather N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Ocean Bay Park, NY 11770
USA
E-mail:

Correspondence Text

Topic Question 1:

I do like Alternative 3 as it takes a holistic and reasoned approach. I also like that it emphasizes the restoration of natural systems and takes climate change/sea level in account for all decisions. First and foremost we need to maintain the unique character and beauty of the island - - which includes no vehicles, the Sunken forest, the cleanliness of the beach, the mom and pop retail of the towns.

Topic Question 2:

While I appreciate the desire to increase visitors (specifically noted as "designed to engage diverse audiences that are representative of the tri-state area demographic"), I am concerned with overcrowding.


And would like to suggest a "cap" on the number of day-trippers that can come to an area on any given day. This is both an environmental and cultural issue - - as towns get overrun on holidays and weekends.

Comments: My family and I have been coming to Fire Island for 11 years, as homeowners for 7. It is truly a special place. I am glad its stewardship is being considered so carefully.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 26

Author Information

Keep Private: No
Name: Mayor James S. Mallot
Organization: Inc. Village of Ocean Beach  Official Rep.
Organization Type: T - Town or City Government
Address: PO Box 457
Ocean Beach, NY 11770-0457
USA
E-mail:

Correspondence Text

September 3, 2015

Fire Island National Seashore GMP
15 State Street
Boston, MA 02109
Attn: Ellen Carlson

Re: Consider Changes to NPS Wastewater Management Plan and Nitrogen Pollution in Great South Bay

Dear Ms. Carlson,

I am writing this letter to address the NPS medium-level Wastewater Management Plan as described in the "preferred alternative plan" of this year's Draft GMP Environmental Impact Statement. The Village of Ocean Beach currently has received seven letters of support from local and state representatives, which I have enclosed, detailing their concerns for the nitrogen and other contaminants that seep into the Great South Bay as a result of antiquated septic systems and wastewater treatment processes on Fire Island.

While Ocean Beach does currently have a sewer treatment plant, it is in need of upgrades and reconstruction. It not only serves the immediate Ocean Beach residential population, it also handles flows from over 12,000 day trippers using the system. The surrounding communities rely on septic systems which are not as efficient at reducing groundwater pollution as an upgraded and modernized system. According to the Wastewater Management Plan on page 71, the NPS "would initiate a Fire Island-wide process to evaluate the issues and impacts associated with the present state of wastewater on both federal and non-federal lands ... " Page 16 mentions the toxicity of algal blooms in the Great South Bay due to nutrient loading, and pages 129 - 130 detail how the groundwater seeps into the bay and the ocean, mentioning nitrogen specifically (" ... in some locations total nitrogen (TN) concentrations were at least 10 times higher. .. compared to undeveloped areas of Fire Island"). Finally, page 207 discusses how "under Alternatives 2 and 3, the NPS would collaborate in efforts to address wastewater management on Fire Island (including federal and non-federal lands) and leading of nutrients into the bay causing habitat degradation for marine life."

The FINS Draft GMP therefore already makes numerous references to the deteriorating state of both the Great South Bay, as well as our wastewater treatment systems. It acknowledges the severity of the issue by including it in both Alternatives 2 and 3. Yet it is only considered a medium-level priority. If our wastewater and sewer treatment systems across Fire Island were enhanced with the necessary upgrades, over 200 pounds per day of nitrogen could be eliminated from entering the Great South Bay. This would result in drastic improvements to the water

quality of the bay and a reflowerishing of aquatic life for years to come.

I ask that you consider the topic of wastewater management to be a high priority and conduct a feasibility study regarding the nitrogen to move forward with the FIST (Fire Island Sewer Treatment) project, by including this study specifically in the Final GMP report. The Village of Ocean Beach is not seeking to be the sole champion of these efforts; what we would like is to offer our expertise and availability of resources to FINS to discover possible solutions for this concerning threat. The preservation of our environment is critical if we all hope to have the Fire Island we know and love continue to exist for us, our children, and their children to enjoy.

The Village of Ocean Beach already enjoys a partnership with FINS, and obtaining a report on the specific impacts of these toxic chemicals in the Great South Bay and the groundwater would be a tremendous benefit not only to the community of Ocean Beach, but to our neighboring communities as well. I urge the National Seashore to help unify the Fire Island communities on this project. The time to act is now.

Sincerely,

Mayor, James S. Mallott
Inc. Village of Ocean Beach

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 27

Author Information

Keep Private: No
Name: Jim Rosenthal
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Dunewood, NY UNK
USA
E-mail: [REDACTED]

Correspondence Text

Re: PUBLIC COMMENT
Draft Fire Island National Seashore General Management Plan

Ellen Carlson
NPS/Northeast Region
Project Manager
Fire Island National Seashore GMP
15 State Street
Boston, MA 02019
Phone: (617) 223-5048
ellen_carlson@nps.gov
Fire_Island_GMP@nps.gov

Michael A Caldwell
Regional Director
Northeast Region National Park Service
U.S. Customs House
200 Chestnut Street
Philadelphia, PA 19106
(215) 597-7013
Michael_caldwell@nps.gov

Fire Island National Seashore GMP
15 State Street
Boston, MA 02109

September 10, 2015

K. Christopher Soller
Superintendent

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

I am a resident of the Hamlet of Dunewood, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore (FINS). My family and I have been homeowners for more than 39 years.

The unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the Moses Road. Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative stewardship and working partnership has evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that the long term management and stewardship of Fire Islands many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964.

My family and I clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. We give our complete support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.

In particular we support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

Preserving the Islands distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

Action Alternative #3 would be consistent with the specific language reflected in the 1963 and 1964 Congressional Hearings, which resulted in the 1964 Act creating the Fire Island National Seashore. The legislative history of Public Law 88-587 indicates the Congress strong desire to protect property owners in the 17 existing developed communities on Fire Island from undue intervention by the Federal Government while at the same time protecting the natural beauty of our Island - certainly a delicate balancing act.

The Hearing Testimony from Murray Barbash, the founder of Dunewood, my community, of Representative Otis Pike, Representative Lindsay, Senator Jacob Javits, Representative Morris, Senator Bible, and Senator Allott - detailed the explicit inclusion of the 17 Developed Communities in an 8-mile section of the Fire Island National Seashore, created by the 1964 FINS Act.

1964 US Senate Hearings on the Creation of the Fire Island National Seashore - - April 10, 1964

1963 US Senate Hearings on the Fire Island National Seashore - - September 30, 1963 / Bill to Establish the Fire Island National Seashore

1963 US Senate Hearings on the Fire Island National Seashore - - December 11, 1963 - - to Establish the Fire Island National Seashore

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

1981 GAO/ Moynihan Report on Fire Island entitled The National Park Service Should Improve Its Land Acquisition and Management at the Fire Island National Seashore, with a Highlights Report

I am encouraged by the strengthened partnership between Fire Island homeowners and the National Parks Service. And I cite as evidence the National Parks Services 2015 Fire Island National Seashores Draft General Management Plan - - Draft GMP/EIS, , Fire Island General Management Plan - Fire Island National Seashore Draft GMP/EIS. The recent Management Plan reflects a major departure from the prior 1977 FINS General Management Plan (1977 GMP), specifically in that in 2015, NPS for the first time acknowledged that the legislative intent of the 1964 FINS Act, PL 88-587, directly and explicitly indicated the Congress strong desire to protect property owners in existing developed communities on Fire Island from undue intervention by the Federal Government.

Since 1964, many have come to fully appreciate and value what Fire Island stands for and recognize Fire Islands enormous contribution to our local economy - to taxes, tourism, and job creation - not to mention our unique cultural and environmental heritage, all of which are used and enjoyed to a great extent by Suffolk County residents, many from the Islip mainland, and around the world.

A May 13, 2003 Suffolk County Budget Review Office Report noted 2.2 million annual visits to Fire Islands 17 communities, with \$50.12 million spent and \$66.83 million in total economic activity (in 1999 dollars) with 756 jobs - all major contributors to the Suffolk County economy and tax base. The 2003 Suffolk County Legislature Budget Review Office Report, Impact of the Atlantic Ocean Beaches to the Economy of Suffolk County, quantified the dollar value of Suffolk Countys Atlantic Ocean beaches in generating spending within the County by its residents, tourists, and transients, and (2) underestimates the dollar value of the recreational benefit of the Atlantic Ocean beaches to residents, tourists, and travelers from around the world, and concluded that:

Visitors to Suffolk County's south shore beaches spent \$255.7 million in 1999 dollars.
The \$255.7 million in south shore beach spending generates economic activity that totals \$341.0 million.
The number of jobs supported by this activity is estimated at 3,855.


These jobs account for \$99.0 million in labor income. The gross regional product (GRP) contributed by Suffolk Countys south shore beaches is estimated to be \$158.6 million. (GRP is the value added to the cost of goods and services, or wealth created, by economic activity in Suffolk County.)
South shore beaches account for one-third of one-percent (0.33%) ffolk County's \$47.8 billion GRP.

Inflation has increased 37.8% between 1999 and today. And, in the intervening 12 years it is reasonable to assume that, if anything, the number of beach visitors and the related spending rates have strengthened - meaning that the Fire Island National Seashores contributions to the Suffolk County economy have skyrocketed between 1999 and the present.

My family and I most appreciate this opportunity to express our support for the GMP Alternative #3 as described above.

Sincerely,

Jim Rosenthal, Homeowner


Hamlet of Dunewood, Fire Island


PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 28

Author Information

Keep Private: No

Name: Eileen O'Neil, EdD, RN

Organization: Fair Harbor_Dunewood Medical District  Official Rep.

Organization Type: L - Non-Governmental

Address: UNK
UNK, NY UNK
USA

E-mail: epko65@aol.com

Correspondence Text

I'm writing in response to the tick surveillance management section on page 55 of the FINS - GMP proposal. Fair Harbor and Saltaire, as members of the Fire Island Wildlife Foundation, were original Fire Island participants and supporters of the NYS-DEC study conducted with Cornell University.

The results of that study demonstrated a significant reduction in the tick population following the implementation of the four Poster system. The number of patients reporting suspected lyme disease dropped dramatically in the Fair Harbor/Dunewood Medical District since that time. In fact, this year we had the only confirmed case of lime in a very long time.

While The FINS focuses on balancing the coexistence of humans and wildlife, We know that any plan is by necessity, a multi year plan. We have a public health responsibility to protect our residents, workforce and visitors from this serious disease.

Our our visitor population, in particular, can be quite transient and follow up nearly impossible. This necessitates the use of prophylactic antibiotics till they return to the mainland with such testing is available.

Each year the community members, visitors and trades people want to be reassured that the Four Poster tick prevention program continues. The Fairharbor/Dunewood Medial District budgets a significant portion of our taxes to support this program. We are convinced from our own experience that the reduction of Lyme disease is a direct result of the Four Poster program.

Eileen O'Neil, EdD, RN
Deputy Commissioner
Fair Harbor/Dunewood
Medical DistrictFire_island

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 29

Author Information

Keep Private: No
Name: Suzanne M. Johnson
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Water Island, NY 11772
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I like the emphasis in Alt 3 on preserving the existing communities while also preserving the unique, natural environment. As a resident of one of the oldest communities, I care about its role in the greater history of Long Island.

Comments: I am writing to you today as one of the residents of Water Island, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). I was a renter for 10 years, and have been a homeowner for 14 years.

The unique and special character of Fire Island has long been recognized by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative stewardship and working partnership has evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964.

I clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. I give my complete support to Action Alternative #3, which recognizes that Fire Island "is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use." In particular I support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities.

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island. (This is particularly important to us in Water Island, as we have experienced serious erosion on the bayside, and expended a great deal of money protecting the bayfront access to our community.)

Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole. As someone deeply interested in local history, and the editor of the only written history of Water Island, I plan to personally work on this important initiative.

I appreciate this opportunity to express my support for the GMP Alternative #3 as described above.

Sincerely,
Suzanne M. Johnson
[REDACTED] Water Island

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 30

Author Information

Keep Private: No
Name: Suzanne Johnson
Organization: Water Island Association
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Rocky Point NY 11778
Water Island, NY 11772
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

The Water Island Association, representing the homeowners and renters of one of the oldest communities on Fire Island, supports Preferred Alternative 3, and its recognition of the unique nature of the Fire Island settlements. We are pleased to see that documenting the rich cultural history will be undertaken by the NPS and we plan to be part of that effort. We are also encouraged by the notion that future shoreline management will help us keep our community accessible to our residents.

Topic Question 2:

Keep us posted via email and facebook.

Topic Question 3:

We thank Superintendent Chris Soller and former Superintendent Mike Reynolds for the hard work they have done on our behalf creating this plan.

Comments:

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 31

Author Information

Keep Private: No
Name: Guy Jacob
Organization: Nassau Hiking & Outdoor Club, Inc.
Organization Type: I - Unaffiliated Individual
Address: PO Box 037207
Elmont, NY 11003
Elmont, NY 11003
USA
E-mail: conservation@nassauhike.org

Correspondence Text

Topic Question 1:
Educational Outreach

Topic Question 2:
See comments below.

Topic Question 3:
See comments below.

Comments: Thank you for the opportunity to comment on your 2015 Draft GM DEIS. The Index to the sections of draft document was comprehensive and easy to follow. The 550-member Nassau Hiking & Outdoor Club is a stakeholder with deep concern for the future of the FINS. Our club leads trips to the Fire Island and many of our members recreate there with friends and family. I have outlined below concerns we have relative to various aspects of the alternatives.

Mosquito Surveillance and Management

The GMP Alternative 3's section entitled "Mosquito Surveillance and Management" mentions working with Suffolk County Vector Control to revise the Mosquito Action Plan and Surveillance Protocols. You state on Page 86, & implement proactive management strategies & to reduce human health risk. A range of low-impact methods would be employed to minimize the effects on seashore resources. This paints an overly optimistic, vague scenario. Consequently, such a measure would be a step in the wrong direction. You provide no examples of this range of methods, but any such measures would be an exercise in futility because they would contradict scientific understandings.

According to the U.S. Environmental Protection Agency (EPA), no pesticide can be considered safe. Federal law prohibits pesticide manufacturers from claiming that the EPA registration of their products means they are safe. The NYS Department of Health (DOH) acknowledges that the use of chemical pesticides is not without inherent risk to human health. By law, no pesticide can be called "safe", and there are many documented health risks associated with exposure to pesticides.

According to the synthesis of research compiled by Earthjustice, more than 95% of applied pesticides miss their target, reaching nearby people, wildlife, waterways, soil and air. Moreover, Earthjustice contends that children are the most vulnerable: they drink 2 times more water, eat 3 to 4 times more food and breathe 2 times more air. Consequently, they absorb a much higher concentration of pesticides compared with adults.

Moreover, to date, there is no significant credible scientific evidence that demonstrates pesticide spraying is an effective method for

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

reducing human exposure to West Nile Virus. Massive, widespread use of pesticides is harmful to both human and environmental health. The NYSDOH has stated the use of pesticides for adult mosquito control is a last resort activity, which should be considered only when there is an imminent risk to human health. Consequently, the New York State West Nile Virus Response Plan establishes a hierarchical approach to respond to mosquito-borne diseases: Education; Larval Habitat Source Reduction; Larval Mosquito Control; and Adult Mosquito Control, in that priority.

Alternative 3s plans to coordinate efforts with Suffolk County Vector Control for more spraying begs the question-how much of this planning is stemming from political pressure by Suffolk County officials? Is Suffolk County Vector Control blaming the NPS for its communities mosquito problems? How effectively has Suffolk County Vector Control followed our states hierarchical approach? Do they provide tax incentives for homeowners to purchase Mosquito Magnets? Do they have an extensive education program that utilizes social media to inform residents of simple, but important measures such as continually removing pools of water? The NPS should not be in a position of taking the path of least resistance, but instead should base its GMP decisions of sound science.

Educational Outreach

Expanding educational outreach, particularly expanding teacher education, is a goal well worth pursuing. Elementary age children are our future, and building a foundation of natural science literacy is critically needed. New York States current emphasis on state exams in English and math leaves little room other subject matter. Providing teachers of grades one through six with an intensive, week-long, hands-on learning experience would encourage more educators to utilize the Seashore as an outdoor classroom.

According to Richard Louv (*Last Child in the Woods: Saving our Children from Nature-Deficit Disorder*), research demonstrates that being immersed in natural settings benefits our mental and physical wellbeing. Fire Island evokes a sense of magic and provides for an experience that finds no substitute. At a time when education is overly focused on the most up-to-date technology and vicarious learning, we desperately need governmental agencies to step up to the plate and offer opportunities for scout, school and civic groups to become more fluent in the natural sciences. The NPS has a long history of partnering with public and private schools and organizations, and this is needed today even much more so than in the past. Much of our learning comes from doing, from making, from feeling with our hands; and though many would like to believe otherwise, the world is not entirely available from a keyboard, Louv noted insightfully in his book.

Research clearly supports the kind of learning Louv advocates for. Consistent with earlier studies, in the late 1990s Stephen Kellert of Yale University found that learning in outdoor settings enhances emotional development for both regular education students and special needs children. According to Kellert, Some of the impacts include increased self-confidence, self-esteem, optimism, independence and autonomy.

Research conducted subsequent to the publication of Louvs book only reinforces earlier conclusions. Most recently, in the June 2015 issue of *Consumer Reports on Health* magazine, an article entitled *Fitness factors* discussed recent research from the UKs University of Exeter and the University of Essex. The study found that calorie burning on a treadmill was equivalent to walking in nature; however, being outdoors in a natural setting did more than an indoor walk to boost energy and reduce stress, depression and negative emotions.

Common sense and anecdotal evidence reveal that this is the kind of learning has great potential for engendering an environmental consciousness as well. Once you touch and learn about flora and fauna, you can relate to it more intimately. If you can name an organism and know something about its adaptations, youre more likely to realize a need to protect and conserve it. Human nature requires us to connect with other living things before we learn to care deeply about them.

Sunken Forest and other Maritime Forests

The erosion at Sunken Forest and other locations, which according to your own DGMP, is directly linked to the Sailors Haven Marina, is the most egregious loss of natural resources on FINS. Your constructed feeder beach that was nourished by the Sailors Haven bayside sediment transport is in dire need of intensive vegetative support. Merely periodically replenishing it is insufficient. Beach grass plugs and other native species should be planted sooner rather than later. Upland that is adjacent to this nourished

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bayside beach should also be provided with native evergreen tree plantings to reinforce and protect the border areas. Organizations could assist NPS employees as your staff is limited. Those who benefit directly from the Sailors Haven Marina could be asked to pay a special assessment to help pay for the flora infusion.

The Wilderness Area and Deer Management

Last year, FINS released a Deer Management Plan, in which the preferred alternative would permit deer hunting for the first time in the Wilderness Area. Since the Old Burma Trail has not been maintained and is impassable, how would hunters be expected to negotiate the Wilderness? Would they be bushwhacking through the Wilderness? Would they be constructing their own spaghetti trails? Clearly, for the benefit of hikers and hunters alike, some amount of trail reconstruction and maintenance is necessary. Because FINS staff resources are limited, some amount of the main trail could be restored even if you couldnt realistically restore the entire trail.

The USFS Wilderness Class 1 standard that provides for a maximum 12" tread and 24" clearance may be useful in some National Forests, but it is inadequate for the Fire Island Wilderness Area given the nature of the vegetation. According to the new standards (pages 49/50) (53-54 on a pdf) Class 3 would be the ideal, but Class 2 would be the minimum acceptable. Restricting any trails to Class 1 would effectively guarantee that no one will hike very far on them, and they would be very difficult to maintain. (http://www.fs.fed.us/recreation/programs/trailmanagement/documents/trailfundamentals/Fundamentals_Trng_Pkg_05_01_2011.pdf)

Conclusion

We appreciate the length of time you have allowed for comments, which gave us an opportunity to provide a more detailed response. We also appreciate your continued encouragement of public involvement.

We understand that a GMP doesnt commit to specific actions, but a GMP should be as specific as possible in justifying its goals. We hope that the Preferred Alternative will be written with a level of detail and specificity that we have not seen in your document Preliminary Management Alternatives. The clearer your goals as an agency are the better stake holders will be to intelligently respond to your plan.

The one guiding principle that should reign supreme in all your decisions is that FINS is a public resource, and your actions should always benefit the public trust. Private homeowners are stakeholders, but their minority, personal interests should never trump the public good that seeks to do the most good for most of the people most of the time. Thank you for your thoughtful consideration. We look forward to hearing from you soon.

For our environment,

Guy Jacob, Conservation Chair
Nassau Hiking & Outdoor Club, Inc.
PO Box 037207
Elmont, NY 11003

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 32

Author Information

Keep Private: No
Name: Lynn Reyman
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Fair Harbor NY
Fair Harbor, NY 10174
USA
E-mail: [REDACTED]

Correspondence Text

I am writing to you as a concerned long time Fair Harbor resident, and an emergency medicine physician. Despite large public awareness, and early treatment Lyme disease and Ehrlichiosis remain serious diseases along with a multitude of other tick borne diseases.

We have been fortunate in Fair Harbor to see a drastic reduction in the Lyme carrying ticks since the inception of the 4-poster project. In years past, many residents, including myself and 2 of my children have contracted Lyme disease. My family had early diagnosis and treatment and have suffered no sequelae.

Others have not been so fortunate. In my practice, I see Lyme Disease in all stages, including neuro Lyme and cardiac Lyme causing significant morbidity. In addition, ehrlichiosis remains a potentially serious disease. I have seen ehrlichiosis render a healthy young man septic with renal failure, respiratory failure, and heart failure. After an extended stay in the Intensive Care Unit, he survived.

The 4-poster program has been a resounding success. To my knowledge no other prevention or treatment program for tick borne illnesses has demonstrated the results we are seeing on Fire Island.

Do not let bureaucracy interfere with common sense. Lets eradicate tick borne illness on Fire Island and prevent unnecessary illness and suffering.

Respectfully,

Lynn Reyman, MD

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 33

Author Information

Keep Private: No
Name: Donald A. Sussman
Organization: FIA, SUMMER CLUB, CORNEILLE ESTATES
Organization Type: I - Unaffiliated Individual
Address: [REDACTED] Summer Club, FI, NY 11770
New York, NY 10010
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
Recognition and Inclusions of the 17 communities in certain planning and future development / implementation.

Topic Question 2:
Addressing the communication of ideas and actions so that this participation can happen in the hopefully broad context it is supposed to.

Topic Question 3:
The only concern is about things that are not said in the document i.e. if there have been ideas, text and / or vagueness included or excluded without narrative to that point

Comments: Date 9/13/15

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

My wife, Kanjana and I are residents of the Hamlet of Summer Club, were married while living on Fire Island, gave birth to our first child while living on Fire island and have both lived as year round residents running an active service business serving homeowners for the first some twenty years and now for the second twenty years as seasonal residents. We are very intertwined with both the past and the future of Fire Island.

We applaud the work that you and your staff have done in the preparation the GMP. It is truly a plan which can help guide us all into the future which is exactly its purpose.

We have been in the past disappointed about many of the aspect of the current plan basically summarized in the Alternative 1 which was both too limiting on both role of the other stakeholders in the future of the island mainly the 17 communities and their needs, effects and interactions as well as we feel it is too limiting on the nation Seashore itself as without this broader context, focus and interaction it has either suffered from myopic views or ones that lacked the benefits of broader consensus and objectives.

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We feel that Alternative plan 3 does just that, and fully support it. In particular, having stewardship that is committed (by its plan approved by the people that it serves) to each and every one of the critically fundamental issues that we recognize and see recognized in the plan, zoning and construction, climate change, wildlife and cultural preservation, land management, improved facilities and more interaction between the communities and the NPS overall.

It is this top down and also foundation up commitment we see in the plan and want to strongly encourage that you pursue Alternate 3 as unlike many other areas of Gov't we need this plan in place to help, to guide and to protect us into the future.

Respectfully,

Don and Kanjana Sussman

Don Sussman
Town & Gardens, Ltd.
[REDACTED]
Long Island City, NY 11101
[REDACTED]

Π Please don't print this e-mail unless you really need to.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 34

Author Information

Keep Private: No
Name: Lynne Teplin
Organization:
Organization Type: I - Unaffiliated Individual
Address: Bronxville, NY 10708
USA
E-mail:

Correspondence Text

Please maintain the Burma Road Trail to preserve access to this area.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 35

Author Information

Keep Private: No
Name: Kevin Oldham
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Shirley, NY 11967-2264
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

Please maintain the Burma Road Trail. This is one of the most beautiful places to hike on Long Island.

Comments: I've been hiking on Fire Island for decades. This trail has become unusable in many areas causing hikers to detour onto the beach. Please do a little overdue maintenance. Thank you.

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Correspondence: 36

Author Information

Keep Private: No
Name: Dr. Richard Von Zerneck
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10025-6533
USA
E-mail:

Correspondence Text

September 10,2015
Fire Island National Seashore GMP 15 State Street
Boston, MA 02109

To Whom It May Concern;

I write to comment on the GMP for the Fire Island National Seashore. The GMP discusses the 4 poster baiting station program on page 55.

The GMP makes short thrift of the 4 poster program although it has been successfully teated and used in the Saltaire and Fair Harbor communities since the start of the original study in 2008. These communities, along with the Robert Moses State Park , have had or have baiting stations on non-federal land. As a long time resident of Fair Harbor, I know just how effective this program has been in reducing the spread of tick borne diseases commonly thought to be spread by deer. The records of the Fair Harbor and Saltaire medical districts both show a precipitous decline in the number of possible cases of Lyme Disease since the start of the program. Anecdotal reports from residents and workers in both communities support the decline of ticks on deer, clearly attributable to the existence of the 4 poster program. Both communities financially support the program as well as providing sites for the baiting stations. New York State has approved the program as well as the tickacide used at the baiting stations. Yet the GMP suggests that the 4 poster program should not be continued.

Scientists have reported a great increase in the number and types of tick borne diseases in the United States. It has become a public health emergency. The GMP also suggests that the 4 poster program helps increase the size of the deer herd by introducing a new food source for the deer. However facts show that the com used at the baiting stations has a low nutritional value and cannot be shown to increase the herd size. In fact, there has been no accurate count of the deer herd since the devastating effects of Hurricane Sandy, which was believed to decimate the herd.

The GMP must not be used to end a vital public health related program that has been highly effective. Programs designed to protect the residents of and the visitors to Fire Island should be supported by the NPS rather than be banned.

Sincerely,
Dr. Richard von Zerneck
Professor Emeritus
The City University of New York

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 37

Author Information

Keep Private: No
Name: Rachel J. Salatino
Organization: Long Island Sierra Club
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Baldwin, NY 11510
USA
E-mail: [REDACTED]

Correspondence Text

The historic Burma Road Trail is already degrading. Increasingly, the path is completely blocked. Visitors are forced out of this small Wilderness area and must hike along a public beach. Narrow sections of the trail result in more contact with vegetation and ticks.

Please maintain the Burma Road Trail to help visitors safely enjoy the Fire Island Wilderness and to preserve the "sense of solitude" at the heart of the Wilderness Act.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 38

Author Information

Keep Private: No
Name: David K. Robinson
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Apartment #1
New York, NY 10024
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

My family and I have been coming to Fire Island for the past twenty years, ever since we moved to the New York area. We have camped at Watch Hill, kayaked at Sunken Forest, climbed the stairs at the lighthouse, gone to a wedding on the beach and have rented and now own a home in one of the communities. We greatly appreciate the "mixed use" aspect of the FINS and would like to see this recognized and continued. Friend and family who visit from outside of New York marvel that there are places you can go to where "there are no cars" and everyone gets around by bike and carries their groceries in "little red wagons" - - we would like to see the "road-less" aspect carried on. We would like to see the continued acknowledgement of the cultural values that the communities bring to Fire Island and would like to see the facilities at Sailor's Haven/Sunken Forest, Watch Hill and the Lighthouse refurbished and maintained so that visitor's can continue to enjoy this unique interplay of unique communities and the national seashore. So, we like the Management Alternative 3, which recognizes this interplay between human use and nature.

Topic Question 2:

- 1) It would be great to expand the ability to get by bike from one end of the island to the other if this could be done in a manner that does NOT create a "trans-island paved road" and does NOT start to introduce additional powered vehicle use during the prime summer months (keep powered vehicle use restricted as it is now to essential services and for the use of year-round residents in "off-season").
- 2) Provide for additional access/safe harboring of kayaks, paddle-boards etc at Sailor's Haven/Sunken Forest.
- 3) Restrict, if it isn't already, powered recreational marine traffic ("Jet-skis", power boats) within a certain distance of the seashore and take other actions so as to help bring back the clam and oyster population and maintain low noise levels.

Comments:

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 39

Author Information

Keep Private: No
Name: Kenneth Klein
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Ocean Bay Park NY 11770
Ocean Bay Park, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I agree with management alternative 3, because it recognizes that I exist and that my family intends to exist on this island for generations to come & I want the Park Service to consider the impact on my community when the planning evolves into actions.

Topic Question 2:

I agree with management alternative 3, because it recognizes that I exist & that my family intends to exist on this island for generations to come. I want the Park Service to consider the impact on my community when the planning evolves into actions.

Topic Question 3:

I agree with management alternative 3.

Comments: I agree with management alternative 3.

I love that there are 17 separate & distinct communities on Fire Island & I don't want to see anything happen that will blur these lines & turn this island into one flavor. Option 3 acknowledges our communities & I expect island wide decisions to be made with us in mind. This a park & a neighborhood of homeowners that co-exist on this rather small island, let us work with the NPS to move into a "green" future together.

I understand that sea level is rising & I believe the Seashore should be involved in responding to that kind of a serious problem that will affect my future & the future of my home & family. I want to be part and parcel of that planning process & expect to participate in the future planning to this specific threat

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 40

Author Information

Keep Private: No
Name: Alan Jasper
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Merrick, NY 11566-5025
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 3:
National Park Service that they must maintain the historic Burma Road Trail to help visitors safely enjoy the Fire Island Wilderness and to preserve the "sense of solitude" at the heart of the Wilderness Act.

Comments:

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 41

Author Information

Keep Private: No
Name: Eddie Greenfield
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Seaview , NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

All management strategies presented in the Draft Fire Island General Management Plan acknowledge the need for cooperative stewardship of both FI's natural and man-made resources. While the most populated communities are not far from National Seashore amenities - since FI is essentially "roadless" - the connections between several Communities and Nature is not as strong as might be expected. Unfortunately, summer residents and visitors may have limited positive experience with National Park Service stewardship, activities, and amenities, especially Wilderness Area natural resources.

The Seashore has been challenged to effectively address land use and development issues on FI, for example: "The concept of employing the Secretary's zoning standards to address land use and development on private lands within the Seashore was originally based on the 'Cape Cod Formula' applied at Cape Cod National Seashore. While the Cape Cod Formula has met with relative success in Massachusetts, it has not translated into success on Fire Island." The Management Plan proposes various collaborative efforts for the NPS to monitor and influence land use development, consistent with federal zoning standards. Toward that end, cooperative stewardship efforts under consideration include the development of a Coastal Land Use / Shoreline Management Plan, the FINS Advisory Commission, and a FI Partnership.

Pursuant to the Draft FI General Management Plan, "the NPS would assume a leadership role in working with FI communities, the towns of Islip and Brookhaven, Suffolk County, and NYS to develop a coastal land use plan for FI. The plan would address shoreline protection, land-use controls, site planning and design standards and post-storm response, the context of the dynamic barrier environment and emerging trends resulting from sea-level rise and climate change." The goal of NPS assisted Shoreline Management planning is consistent with the objectives of the 2014 Fire Island NY Rising Community Reconstruction Plan, which also identifies Shoreline Management - both planning and implementation - as an extremely high priority; especially, Bayside Shoreline Management.

NPS leadership on issues regarding bayside erosion and shoreline management would be extremely helpful. FI's bayside shoreline is characterized by very varied conditions, including mud and tidal flats, hard surfaces with bulkheads, riprap areas, and sandy beaches. Some areas are exposed to high-energy waves while other bay areas are somewhat sheltered from Nor'easterly winds. The Draft FI General Management Plan suggests that the NPS will be prepared to lead a comprehensive assessment of different conditions and consider the appropriateness of various shoreline strategies. For example, the Plan notes that as bayside long-shore erosion occurs (east to west), sediment appears to be removed from the system. Interestingly, the plan suggests that bayside erosion and management may be less studied and more complex than oceanfront beach management: "How and where bay side sediment is moved is not as clear as the east-west transport of sediment on the ocean side." Fortunately, the NPS appears to be interested in a range of different stabilization strategies, including depositing dredged sediment adjacent to FI's bay shoreline, potentially improving habitat conditions.

Strengthening the relationship between the human environment in the communities and the FI National Seashore, as

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

envisioned by Management Alternative 3, would offer groundbreaking opportunities to support the mission of the Seashore and enhance the Fire Island experience for local residents and visitors. From somewhat different perspectives, both FI communities and the National Park Service are seeking ways to plan for climate change including sea-level rise.

With appropriate increases in resources, invaluable outreach to the communities would be possible. The Draft EIS suggests that the NPS might substantially expand "hands on" waterborne scientific and recreational programming, such as coordinating outreach on the Maritime Museum's Historic Oyster Sloop Priscilla and expanding Seashore guided canoe/kayak tours. Activities on weekdays in the summer, near "western" FI communities (Point O' Woods to Kismet) could be very popular, attracting children and adults who might otherwise have limited experience with Fire Island's unique natural resources and the stewardship of the National Seashore. Expanding lateral bicycle transportation on FI is very appealing; however, in light of the extensive areas lacking bike-friendly pathways, improving current biking opportunities for conventional bikes may be challenging. A supported fat tire beach bike pilot program may be feasible. It may be possible to introduce limited walkway/bike path extensions, which, by design, do not facilitate use by motor vehicles.

The Seashore is implementing programs to protect water quality and manage non-native invasive species. Natural Resource science regarding beach vegetation, wildlife, and coastal geology could be more fully shared with interested community residents and visitors. For example, FI residents would like to know more about "green landscaping" strategies, supporting native plants and ecosystems within residential communities. FI communities face intense development pressures, land use challenges, flooding, shoreline management, and erosion; additional outreach, including discussion of NPS experience and perspective on these and other difficult matters could significantly increase public understanding and hopefully support sounder, more sustainable, preservation and development.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 42

Author Information

Keep Private: No
Name: Danielle Bellemare
Organization:
Organization Type: I - Unaffiliated Individual
Address:
kismet Fire Island, NY 11706
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
See Question 3 or comments

Topic Question 2:
See question 3 or comments

Topic Question 3:
September 14, 2015

Fire Island National Seashore GMP
15 State Street
Boston, MA 02109
Attn: Ellen Carlson

Re: Draft Fire Island National Seashore General Management Plan

I started working and renting on Fire Island in 1987 and I never left. Since that time I purchased my own home and live here year round. I am very involved in the community. I am a member of the volunteer Fire Dept, Kismet Community Association and FIYRRA. It is a known fact that Year round residents were here prior to the establishment of Fire Island National Seashore. While there was an acknowledgment of the need to stop the "Moses Road", there was a significant concern regarding the effect of a newly established national park area and all the regulations that such an entity would bring to the Island.

The driving regulations and restrictions are a perfect example. The need to maintain a viable, sustainable year round community was and continues to be important and it is of great importance to the success of the Island as a whole. As a year round resident, we are the core members of the local fire departments, maintaining each community's fire department, EMS and rescue services. The seasonal residents and off-season visitors to these areas within the communities are dependent on us. Therefore the need for a strong fire, EMS and law enforcement response to emergencies during the winter as well as the summer and shoulder seasons is vital because is in most cases entirely dependent on the year round community.

Since I have become an active member of Fire Island I have learned a lot about the history of it. I have learned that since the establishment of Fire Island National Seashore the relationship between the NPS and the Year Round community has been strained and at times adversarial. Many of the areas of tension were within the areas of management and driving issues in which I have experienced myself. After reading this GMP alternative 3 it sounds like these problems could be solved with a

new relationship due to addressing the human component.

Over the past several years, there seems to be a stewardship and working partnership developing. I hope that the new approach of communication, coordination and collaboration will alleviate the gray areas in the previous GMP. The Draft Management Plan for Fire Island incorporates this new policy of cooperation and dialog, and acknowledges that " the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

In reviewing the Draft GMP I support Alternative #3, which recognizes that Fire Island 'is a natural landscape with significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use. I appreciate the fact that Alternative #3 of the GMP recognizes that Fire Island is a place where adaptation to and manipulation of the environment has shaped it distinctive character we now see today.

That fact that the NPS now recognizes the relationship between human use and nature in this document is an encouraging development in the long-term vision in managing Fire Island National Seashore.

Cooperative Stewardship. The idea of FINS working collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities has our support. I support the holistic approach to and the idea of a forum for communication, coordination and collaboration of the Island's stewardship. It is appreciated. The Draft GMP is recognizing the many groups (year round, seasonal and day visitors) that are responsible for the care and future of Fire Island. This is a refreshing and much welcomed change in the direction of management of FINS.

Concerns include:

- Under Access and Transportation the GMP states that the NPS wants to ensure that transportation routes to NPS facilities on Fire Island and Long Island are well known, well-marked and easy and safe to navigate. It is my understanding this should be interpreted by future Superintendents to maintain the vehicle tract aka "Burma Road" between the Robert Moses and Kismet as a safe, stable and sustainable route to the mainland. This multi-user trail must be considered as important as boardwalk access as it is the only vehicle route connecting Fire Island to the mainland.
- I am very ,very, very concerned that the impact of increased visitation to the Lighthouse in particular could adversely affect our driving needs due to pedestrian traffic on the "Burma Trail". I would want an avenue of discussion if that situation should arise.

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan. I appreciate the collaborative approach of coastal use and shoreline planning

Concerns include:

- I am curious where the "no-anchor zones" would be established in front of Park properties. I recognize that these are areas of the bay need be studied for environmental impact however what would be the consequences to public and residential use should certain areas adjacent to the communities be closed.
- I appreciate the fact that FINS would/ wants take a leadership role in zoning issues, however I remain cautious as to how overreaching the government's authority would be. Local zoning regulations should still be instituted on privately owned land. I ask that the NPS further describe what their "leadership" role would actually be. I feel it could create more problems.

Preserving the island's distinctive character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

Concerns include:

- With the attempt of the NPS in establishing a more open dialog between the communities which includes the FI year round residents it is my concern/hope that our voice will be heard and appreciated concerning the driving regulations and the effect

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

the regulations have on our ability to live productively on Fire Island. We are a relatively small group compared to the seasonal residents and our concern to be recognized and appreciated as an integral and necessary community on Fire Island is paramount.

- Albeit it is a commendable idea to be able to laterally transverse the island by bicycle we however would be concerned about the impact within the communities. I do note the fact that NPS wants to establish an Intercommunity Bicycle Working group and this does suggest that they are aware of the concerns and it is appreciated. Our Ems services are already stressed to the max. We would not be equipped to handle the accidents that would come with increased biking.

I

- With the NPS's desire for an increase of public visitation to NPS sites and communities, I am concerned about the increased stress to the communities (garbage removal, damage to community property) or increased use of the services (Fire, Rescue, Medical, Lifeguard, etc.)

I presently pay through KCA for community garbage removal. I pay privately for my own personal garbage removal and through my taxes I pay a police and lifeguard tax. With the increase visitation the need off these services will increase and most likely so will my taxes so how do you propose to off set these cost?

Sincerely,

Danielle Bellemare

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 43

Author Information

Keep Private: No
Name: Irving Like
Organization: Fire Island Conservancy, Inc.
Organization Type: I - Unaffiliated Individual
Address: 179 Little East Neck Road North, Babylon, NY 11706
Bay Shore, NY 11706
USA
E-mail: ilike@rlt-law.com

Correspondence Text

Topic Question 3:
Yes, see comments below.

Comments: Please include in the record of the FINAL GMP/EIS the responsive comments emailed to the FINS Superintendent Chris Soller, September 15, 2015 of the Fire island Conservancy, Inc., the attached FICI advertisement in the Fire Island News of September 11, 2015, and the supporting documentary evidence.
Irving Like, Counsel to the FICI

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 44

Author Information

Keep Private: No
Name: Ann and Thomas Golden
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Robins Rest, NY UNK
USA

E-mail:

Correspondence Text

9/10/15

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Islad National Seashore General Management Plan

Dear Superintendent Soller:

My wife Ann and I attended the meeting held in Ocean Beach in July and learned a lot by doing so. We have been residents in Robins Rest for almost three years, purchasing our house late in 2013. Robins rest is one of the 17 Fire Island communities that predate the formation of the F. I. National Seashore. Prior to purchasing our house we rented at 6 different communities for several weeks many summers.

Fire Island is unique and a special place. Concern for this "special" place led the residents to seek and facilitate the formation of FINS as a way of stopping the Moses Road. A collaborative stewardship and working partnership between FINS has developed over the last several years and it needs to continue.

My wife and I support alternative #3, which recognizes that Fire Island "is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use".

Particularly we support these elements: (1)Cooperative Stewardship (2) Shoreline Management Planning and (3) Preserving the Islands Distinct Character.

We appreciate this opportunity to express our support for the GMP Alternative #3 and we thank you for all your hard work on this project.

Sincerely,
Ann Golden & Thomas Golden
[REDACTED]
Robins Rest, NY

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 45

Author Information

Keep Private: No
Name: kitty king
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Bay Shore, New York
bay shore, NY 11706
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I am in agreement with Most of the proposals for alternative #3 with the exception of the involvement of the NPS in land use etc of private homes in the 17 communities. Please see below.

Topic Question 2:

Please see below.

Topic Question 3:

The National Park Service is doing a wonderful job helping to maintain the natural beauty of the Island as well as building a positive relationship with the 17 communities on the beach. The NPS should not be allowed to take on a leadership role in working with Fire Island Communities, the towns of Islip and Brookhaven, Suffolk County and New York State when it relates to land use controls, site planning or design standards for the private homes in the 17 communities on Fire Island. The federal government in the 1960's granted protection to the 17 communities and this protection should not be violated in any way.

Comments: I think Chris Soller of the NPS has done an excellent job, however, I do not feel the NPS should be involved in actively participating in any decisions involving private home ownership. That, I believe, should be left to the individual homeowners and the local government.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 46

Author Information

Keep Private: No
Name: John and Janice Di Laurenzio
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Baldwin, NY 11510
USA
E-mail:

Correspondence Text

Date 9/9/2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

My family has been a longtime resident of a small town on the western end of Fire Island named Dunewood. Dunewood is one of the unique 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). My family and I have loved the specialness of this beautiful island for over 35 years and now my 5 grandchildren are experiencing that same specialness that this magical island offers.

This unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place was the drive that led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative and working partnership appears to have evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

My family clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. We give our complete support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use. ' In particular we support the following elements of the Preferred Alternative:

Joined Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Ocean management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

An effort to keep the unique and special Island's distinct character: The NPS would work collaboratively with others to help

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

As a homeowner and gatekeeper of this special island we support the GMP Alternative #3 as describe above

Sincerely,

John Di Lorenzo

Janice Di Lorenzo

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 47

Author Information

Keep Private: No
Name: Dr. Samuel J. and Maureen O'Donnell Mann
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10128
USA
E-mail: [REDACTED]

Correspondence Text

September 10, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

We are residents of the village of Fair Harbor, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). We have been homeowners for more than 25 years.

The unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place. led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative stewardship and working partnership has evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

We clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. We give our complete support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

In particular we support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

We most appreciate this opportunity to express our support for the GMP Alternative #3 as described above.

Sincerely,

Samuel J. Mann

Maureen O'Donnell Mann

[REDACTED]

Fair Harbor, Fire Island

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 48

Author Information

Keep Private: No
Name: Sharon and Arthur Fiyalka
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10016
USA
E-mail:

Correspondence Text

September 8, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore GMP
15 State Street
Boston, MA 02109)

Re: Draft Fire Island National Seashore General Management Plan

Dear Superintendent Stoller,

My husband and I are homeowners in the Hamlet of Robbins Rest, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). We have owned our home for more than 30 years.

The unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative stewardship and working partnership has evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

My husband and I do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed G_MP. Alternatively, we give our wholehearted support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

In particular we support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

My husband and I believe that Alternative #3 is the most proactive and cooperative alternative being presented. Therefore, we support Alternative #3 completely.

Sincerely,

Sharon Fiyalka


Arthur Fiyalka

Robbins Rest

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 49

Author Information

Keep Private: No
Name: Loretta M. Ferraro
Organization: Fire Island Union Free School District  Official Rep.
Organization Type: I - Unaffiliated Individual
Address: PO Box 428
Ocean Beach, NY 11770-0428
USA
E-mail:

Correspondence Text

September 16, 20 IS

Fire Island National Seashore GMP
15 State Street
Boston, MA 02109

Re: Draft Fire Island National Seashore General Management Plan

The Fire Island Union Free School District, located in the Hamlet of Corneille Estates, one of the 17 residential communities on Fire Island is an institution that predates the formation of Fire Island National Seashore ("FINS"). As the superintendent of the district, I respectfully submit comments on behalf of the Fire Island UFSD.

The unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Located within the boundary of the Fire Island National Seashore is the Fire Island UFSD. The Fire Island UFSD is comprised of areas known as Fire Island Beach and Great South Beach. Fire Island Beach is a detached portion of the Town of Islip lying south of the Great South Bay, it being the westerly end of what is known as Great South Beach. About thirty-five miles of Great South Beach lies east of Fire Island Beach and is in the town of Brookhaven. The students of the school district come from a variety of communities on Fire Island, with Davis Park on the east and Station Fire Island, a Coast Guard base near Robert Moses State Park, on the west being the farthest points.

The recently released draft General Management Plan for Fire Island incorporates a policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

In the General Management Plan under Access and Transportation it states that the NPS wants to ensure that transportation routes to NPS facilities on Fire Island and Long Island are well known, well-marked and easy and safe to navigate. It is essential that the vehicle tract "Burma Road" between the Robert Moses and Kismet be maintained as a safe, stable and sustainable route to the mainland. The ability to safely traverse the roads is critical to the school district.

On behalf of the Fire Island UFSD I support Action Alternative #3, which recognizes that Fire Island is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

use.'

In particular I support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

I sincerely appreciate this opportunity to express support for the GMP Alternative #3 as described above.

Sincerely,
Loretta M Ferraro
Superintendent

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 50

Author Information

Keep Private: No
Name: Diane I. Ives
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Copiague, NY 11726
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 2:

Restore and maintain to hikable width old Burma Road Trail - The Otis Pike Fire Island High Dune Wilderness (Fire Island Wilderness) is the only federally designated wilderness in New York State. In its new Draft Management Plan, the National Park Service is proposing to only maintain the old Burma Road Trail to a width of 0 - 12 inches for unspecified lengths at the trailheads and "points of interest."

The trail is already degrading. Increasingly, the path is completely blocked. Visitors are forced out of this small Wilderness area and must hike along a public beach. Narrow sections of the trail result in more contact with vegetation and ticks.

Comments:

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 51

Author Information

Keep Private: No
Name: Eugene Levy
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Fair Harbor Town of Islip, NY 11706
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
Alternative #3

Comments: September 16, 2015

Attention: Ellen Carlson
Fire Island National Seashore GMP
15 State Street
Boston, MA 02109)

Re: Draft Fire Island National Seashore General Management Plan

I am a resident of Fair Harbor, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). I have been a homeowner for more than 32 years. I am also the president of the Fair Harbor Community Association.

The unique and special character of Fire Island has long been recognized by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1984.

Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative stewardship and working partnership has evolved.

The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

I believe that the continuation of current management practices is counter productive and inappropriate.

I give my complete support to Alternative #3 with specific support for the following elements.

- Cooperative Stewardship
- Shoreline management planning
- Preserving the Island's distinct character

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Thank you for giving me the opportunity to give my thoughts on this important matter.

Sincerely,

Gene Levy

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 52

Author Information

Keep Private: No
Name: June Fait
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Rockaway Park, NY 11694
USA
E-mail: [REDACTED]

Correspondence Text

September 13,2015

Chris Stoller,Superintendent
Fire Island National Seashore
120 Laurel Street
Patchogue, NY 11772

Dear Superintendent Stoller,

I would like to comment on the draft GMP specifically as it relates to the Wilderness Management Plan. As a member of the Adirondack Mountain Club, Long island Chapter, while I do enjoy the Adirondacks, our group also does quite a bit of hiking right at home. And in the past we have enjoyed hiking on Fire Island, especially in the National Seashore. I have led quite a few hikes there myself. Of course after the breach we can only hike as far as Bellport Beach but even that pleasure is denied to us because of impassible trail conditions.

The "Burma Road" is not only a hiking trail but an historic road. And really the only way the true wilderness of the National Seashore can be experienced. It is important that it be kept open & passible for foot travel. I would like to see this reflected in the GMP. I do realize that staffing is short but it should be possible to enlist the help of volunteers in helping with maintenance. Please open the trail/Burma Road. Continued support for the wilderness is stronger when it can be experienced.

Respectfully,
June Fait

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 53

Author Information

Keep Private: No
Name: John Pappas
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10016
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
I support Action Alternative #3

Topic Question 3:
Please DO NOT even consider the Continuation of Current Management Practices described as Alternative #1

Comments: I'm resident of Cherry Grove, one of the communities that came into existence before the formation of FINS. I've been renting at the Grove regularly since 2009 although I have been enjoying the beauty of Cherry Grove and other Fire Island communities since the 1990s.

Fire Island has enchanted all who visit and this spell it creates is what motivated its residents to seek and facilitate the formation of FINS in 1964 as a way of stopping the destruction of the island that Robert Moses proposed via his ill conceived road. Back in the past the relationship between FINS and the residential communities had been adversarial, with many areas of tension on management issues-but lately there has been a great spirit of collaborative stewardship and a real working partnership. I believe that the recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

I absolutely do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. I wholeheartedly support Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

The three particular elements of the Preferred Alternative that I support are:

1- Cooperative Stewardship: FINS working collaboratively with Cherry Grove and all of the other communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

2- Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

3- Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

I thank you for this opportunity to express my support for the GMP Alternative #3.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 54

Author Information

Keep Private: No
Name: Ruth and Fred Fahrbach
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Fair Harbor, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
Like Alternative #3 which is the most inclusive of them all, taking into consideration all parties and the island.

Topic Question 2:
No

Topic Question 3:
Yes....see below in comment section

Comments:
September 16, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

Dear Mr Soller,

My husband, Fred, and I are 43 year residents of Fire Island, with our first home in Ocean Bay Park and, then, after we had our children, moving to our current home in Fair Harbor where weve been for 27 years.

Having been raised in the Midwest and only moving to the East Coast in 1970, I was unaware of the history of Fire Island but initially saw only how extraordinarily special it was. In those early years, we did not understand all the ecological issues, but could only think how lucky we were to be a part of this little piece of heaven.

Our knowledge of Mother Natures forces at work on Fire Island has grown over the years as has our sense of responsibility to protect it. Our children grew up with this love ingrained in them and now, to them as well, it is their most beloved place on earth. One of our children, who today is 31 years old, is special needs. Fire Island has played a pivotal role in teaching him independence and has helped give him self-respect as he grew up being nurtured by neighbors and shopowners while helping the ferries and cleaning up the bay and beaches. It is not only the island but also community here that is special. We have come to see that there needs to be a balance to how it is treated&..respecting and protecting its natural beauty while also respecting and protecting the communities that have arisen over the years.

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Under your leadership, we have been very happy to see that in the last few years there appears to be a new willingness for government agencies and residents to partner in their stewardship of this amazing place.

After carefully reading the Fire Island National Seashore General Management Plan (and participating in the survey), for us, it is clear that we cannot continue current management practices (Alternative #1) but must support Alternative #3 which recognizes Fire Island is a natural landscape with significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use. In particular we support cooperative stewardship (FINS FI communities), shoreline management planning and preserving the islands distinct character.

We most appreciate this opportunity to express our support for the GMP Alternative #3 and sincerely hope this is the plan that is adopted as it is the most inclusive of them all.

Sincerely,
Ruth and Fred Fahrbach

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 55

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fair Harbor, Fire Island, NY 11770
USA
E-mail:

Correspondence Text

Topic Question 1:

I like Alternative #3 for Fire Island because it recognizes the strong connection between natural and cultural resource protection and use. I think the concept of Cooperative Stewardship is particularly important. The Fire Island communities pre-date the creation of the national park and those residents were instrumental to bringing the park into being. They are as much a part of the island's distinct character as the deer and the dunes.

Comments: As a resident of Fire Island for the past 30 years, I am keenly aware of how special it is. And while the beaches and wilderness area are beautiful, the communities are key to its distinctive character. I support Action Alternative #3 for Fire Island management because it is the only option that recognizes and respects their contribution.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 56

Author Information

Keep Private: No
Name: Kathryn Sekulo
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Centereach, NY 11720
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I support alternative #3, as it proposes collaboration and partnership between all stakeholders of Fire Island. These groups should share in the responsibility and accountability for stewardship.

Topic Question 2:

While I strongly support the shared option (#3), I hope that there is continued focus on protecting the barrier beach. I am also a Long Island homeowner and think it critical that Fire Island be protected.

Topic Question 3:

Important to continue to limit private vehicles and keep Fire Island a roadless environment. We struggle now with golf carts, speed and volume. With so many visitors to the 17 communities and parks, we don't need to add additional congestion. Also, important to monitor both Brookhaven and Islip regarding building permits. Let's not overbuild for the sake of a few tax dollars.

Comments: Appreciate the opportunity to comment on this very important initiative.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 57

Author Information

Keep Private: No
Name: Jim Brown
Organization: South Shore Audubon Society
Organization Type: I - Unaffiliated Individual
Address: P.O. Box 31
Freeport, NY 11520
USA
E-mail: jrb398@yahoo.com

Correspondence Text

Topic Question 1:
Ideas we like appear below.

Topic Question 2:
Suggestions for improvements appear below.

Topic Question 3:
Comments on the Draft Wilderness Stewardship Plan and the Fire Island Draft General Management Plan (2014-2015)

National Park Service:

Regarding the recently published Draft Wilderness Stewardship Plan (WSP) and the Draft Fire Island National Seashore General Management Plan (GMP), we urge your agency to thoughtfully consider the comments below of the South Shore Audubon Society. Our organization is a local chapter of the National Audubon Society that represents approximately 1,500 families from the south shore of Long Island.

The Wilderness Area of Fire Island is extremely important to the South Shore Audubon Society and its members. This seven mile long wild section of Fire Island has been enjoyed by our members and many others over the years. The land provides important habitat for birds and other wildlife as well as offering the possibility of a true "wilderness experience" to those who love nature. Most of our comments to follow are related most directly to the WSP for the Otis Pike Fire Island High Dunes Wilderness.

There are numerous positive elements in the WSP, and we are happy to see that the National Park Service plans to preserve wilderness qualities of the Otis Pike Wilderness, through continuing such activities as eliminating invasive species and protecting endangered species such as the Piping Plover. We appreciate that signage in the Wilderness will be kept to an absolute minimum.

Regarding the section of the WSP addressing Roads, Trails and Vehicle Cuts (VII A, page 19), we do have some important comments to make: We strongly believe that the Burma Road, an historic byway through the Wilderness, should be better maintained than it is at present and better than the WSP specifies. An important goal of the Wilderness Act has always been to provide opportunities for solitude and primitive recreation. At present the Burma Road is inadequately maintained and the Wilderness Stewardship Plan states that in the future only the trailheads of the path will be maintained. (Here an ambiguity should be noted: the WSP refers to maintenance only at the trailheads whereas the GMP, p. 53, seemingly refers to maintenance of the whole path). The Burma Road trail is currently severely overgrown, as are a couple of spur trails that lead

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

to some of the most beautiful and unique parts of the Wilderness. If hikers and birders are unable to access important parts of the Wilderness, a key goal of the Wilderness Act- -providing solitude and primitive recreation- - will not be adequately realized. Importantly, wilderness areas require advocates, and it is necessary that possible advocates have access to the nature that is available at Fire Island.

The SSAS recommends that the Burma Road trail and several spur trails be maintained at a Wilderness Class 2 standard. It is not sufficient to maintain the Burma Road only at each terminus. It has been stated by NPS staff that finances may be an issue in the lack of effort put into the maintenance of these primitive trails. If that is the case, the Fire Island Seashore Management could perhaps ask local hiking and environmental groups to help with the task. Volunteers would be available to assist park personnel.

Regarding "Mosquito Surveillance and Management" addressed by the General Management Plan (p.86.of GMP, Management Alternative 3), the South Shore Audubon Society recommends that NPS revise the plan to halt the spraying of pesticides and seek alternative, more natural methods of mosquito control.

Jim Brown
SSAS Conservation Chair
September 16, 2015

Comments:

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 58

Author Information

Keep Private: No
Name: Jennie Mandelino
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Cherry Grove, NY 11782
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities.

Topic Question 2:

Each community should have at least one community representative on any Management Partnership, Commission and/ or Committee- that is recognized as a voting decision maker and information highway back to the community.

Topic Question 3:

The GMP constantly refers to the land use standards, but those standards are very old and are outdated. Why wasn't an EIS done on the standards to properly evaluate the Environmental impacts to the island as well as the community use of their properties?

The communities should be able to afford the privilege of recreational uses of their land and properties when installing temporary equipment. Lot coverage is usually defined as non permeable but the standards include everything from open decks to aboveground pools. Height standards were set before flood elevations.

Comments: Every community on the island has its own history and resources and/or lack of resources with that in mind unformed building standards although valuable should be evaluated and variances should be approved that afford the best solution or adaptation to the environment.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 59

Author Information

Keep Private: No
Name: Kennon Rothchild
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Upper Nyack, NY 10960
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I like very much the notion that the NPS recognizes that human activity since before European "discovery" has been an integral aspect of the ecology of Fire Island; and that that activity continues to be an important aspect to this very day

Topic Question 2:

Just recently I came across a book describing the history of hotels near the Lighthouse; and the Chattaqua gatherings which gave rise to Point o' Woods; and was fascinated. And it was all new information to me even after 60 years of visiting. So any initiatives which assist in keeping these and other histories alive should be an integral aspect of the proposed Alternatives.

Topic Question 3:

I have written a letter - see below.
Thank you for the opportunity to comment.

Comments: September 17, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

I am writing in support of Alternative #3 of the GMP for the Fire Island National Seashore. As a person who has been fortunate to spend some small part of each summer on the Island for the past 60 years, I applaud that GMP Alternative's recognition that human beings have always been part of the ecology of the barrier beaches of Long Island. From the very earliest "Keep Off the Dunes" signs from the days of my youth (prior to the 1964 establishment of the FINS), to the subsequent rehabilitation of the Lighthouse, and to the even more recent dune replenishment initiatives, the residents and property owners of Fire Island have shown themselves to be amongst the most ardent of preservationists. Option #3 allows for that to continue, while fostering and promoting greater cooperation and coordination with the National Park Service and its efforts to preserve yet provide more meaningful access to the American public.

I am a "3rd generation" resident of the community of Fair Harbor, as my grandfather first rented, then purchased a cottage in the late 40's; we came out from Minnesota to visit each summer. Later my parents purchased a house in the community, and now I have, for my family. We care deeply about preserving what Fire Island is, which is a largely unspoiled, natural seashore, with a rich social/cultural heritage, easily accessible to not just wealthy citizens, but to all citizens of the South

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Shore and the NYC metropolitan area. In recent years I have seen an increase in families of "day-trippers", as well as renters, of all socio-economic classes and groups, who come out to enjoy a largely undeveloped, car-free environment. With the adoption of GMP Alternative #3, this increasing process of accessibility can continue to everyone's benefit, as the NPS and the residents of the Fire Island can work hand-in-hand to both protect the environment, promote the Seashore as a cultural heritage site, and ensure its responsible enjoyment by its many visitors. In short Alternative #3 will promote Cooperative Stewardship between the FINS and the Fire Island communities on important issues of land use planning and environmental quality; foster Shoreline Management Planning with the FINS in a leadership role, working with all stakeholders to develop appropriate coastal land use plans; and work to Preserve the Island's distinct character as a natural environment with a rich cultural history of human activity.

As mentioned in the GMP, more recent cooperative efforts between the NPS and the communities of Fire Island have shown that it is possible to both preserve and protect a unique and beautiful environment, while accommodating human recreational and cultural activity in a mutually beneficial way. GMP Alternative #3 is the best possible Alternative for continuing these initiatives to the benefit of current and future generations.

Yours,


Ken Rothchild

[REDACTED], Fair Harbor
[REDACTED], Upper Nyack, NY

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 60

Author Information

Keep Private: No
Name: Irving Like
Organization: Fire Island Conservancy, Inc.  Official Rep.
Organization Type: P - Conservation/Preservation
Address: 179 Little East Neck Road
North Babylon, NY 11706
USA
E-mail: ilike@rlt-law.com

Correspondence Text

September 15, 2015

Fire Island Conservancy, Inc respectfully responds to the Final Draft General Master Plan/EIS.

We reaffirm our prior verbal and written communications to you. We approved and stated that the preliminary GMP findings and supporting evidence, satisfied the criteria for designation of the Fire Island National Seashore as a World Heritage Site. We asked the FINS to take action to gain such designation.

Newsday, August 3, 2015 published our letter to the editor expressing FICI's position.

The Final Draft more than reinforces the need and value of such a designation.

The Final GMP document should now explicitly state its support as imperative to undertaking planning policies and programs to protect the FINS and community character (Alternative 3) from impending threats of destruction by Sandy type storms, Climate Change and Rising Sea Levels, which the GMP now specifically recognizes.

Designation will facilitate access to resources and the expertise and experience, of world class scientists, engineers, economists, planners, and other experts who are now tackling these problems in many areas of the world.

Pope Francis' recent encyclical and the UN have expressed the world's responsibility to deal with these threats as scientific, economic, ecological and moral imperatives.

The fact that military hostilities are destroying World Heritage Sites, and revered cultural antiquities, creates a crisis, which urgently calls for such designation as a symbol and tool of peace.

Support for the designation is growing on Long Island. Town of Brookhaven Supervisor Ed Romaine, NYS. Senator Tom Croci, and Dr John Tanacredi, head of the Environmental Sciences Division of Molloy College, are among those who have announced their support of such designation.

Please include, and confirm receipt of this email to be included in the record of the Final GMP, together with the attached advertisement by FICI in the September 11, 2015 print edition of the Fire Island News, If requested to gain inclusion, we will provide the documentary evidence of the growing support.

Thanks for the excellent work your staff under your leadership in creating the new GMP. We look forward to a future anniversary celebrating the designation.

Irving Like, FICI counsel

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 61

Author Information

Keep Private: No
Name: Brendan D. Reynolds
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Lonelyville, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I am in general agreement that Alt #3 offers the greatest benefit to Fire Island as a whole.

Topic Question 2:

See comments below

Topic Question 3:

The NPS should not have any involvement with zoning and building permits within the Fire Island communities. This should be left to the Towns of Islip and Brookhaven and the New York State DEC where applicable to enforce. Any issues that arise can be addressed directly by the local homeowner and the their town zoning board. Another layer of government involvement will only make the design and permitting process for maintaining/building a home on Fire Island even more expensive and time consuming.

Comments:

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 62

Author Information

Keep Private: No
Name: Denise Soffel
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10024
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

Alternative 3 - I appreciate the recognition that "Fire Island is a natural landscape with a significant cultural overlay and recognizes the strong connection between natural and cultural resource protection and human use.

Historically, human use and development have reflected and responded to the natural qualities and character of the barrier island environment on Fire Island in how it has been used, adapted to, and manipulated. Through a proactive and collaborative management approach, the NPS would seek an appropriate balance between continuing human use and protecting Fire Island's fragile environment." I believe that is the heart of a successful strategy for managing Fire Island.

Comments: I have been a resident of Fair Harbor, one of the 17 residential communities on Fire Island, for over 32 years. Fire Island has a unique and special character that should be preserved, balancing the needs of residents with the goals of the NPS and the preservation of this fragile ecosystem. I give my complete support to Alternative #3 with specific support for the following elements.

- Cooperative Stewardship
- Shoreline management planning
- Preserving the island 's distinct character

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 64

Author Information

Keep Private: No
Name: renee lesser
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10016
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
Management Alternative number 3

Topic Question 2:
None other than an alternative that encompasses my concerns and comments as set forth below.

Topic Question 3:
I agree with management alternative 3 because it seems like more of a long term plan that takes into account that I exist and that my family intends to exist on Fire island for generations to come, and I want the Park Service to consider the impact on my community when the planning evolves into actions. It also takes into account that both the various species of migrating birds using this "Atlantic Flyway" and my family co-exist and the Park Service needs to recognize that we are both central to the cultural and ecological diversity of Fire Island. My husband and I fell in love with Fire Island more than 20 years ago and eventually purchased a home so our children, who are being raised in the City could experience and have access to some of the most beautiful sunsets anywhere in the USA. You must keep, maintain and enhance appropriate visitor interaction with Fire Island and define your role as a park for the people. Don't close the Sailor's Haven marina. We love that there are 17 separate and distinct communities on Fire Island and don't want to see anything happen that will blur these lines and turn this island into one flavor. Option 3 acknowledges our communities and I expect island-wide decisions to be made with us in mind. This is a park and a neighborhood of homeowners that co-exist on this rather small island - let us work with the NPS to move into a "green" future together. Our children can ride their bikes or play outside without worrying that they will be hit by a tractor-trailer barreling down the beach. Please continue to manage driving regulations and please include some of us homeowners in discussions you have when you are looking at amending driving regulations. This should be a subject we all get to speak about.

Although I appreciate that sea level rising is a fact, I think the Seashore should be involved in responding to that kind of a serious problem that will affect my future and the future of my home and family. However, I want to be part and parcel of that planning process and expect to participate in future planning to this specific threat.

I read that Fire Island has a maritime forest ecosystem of old growth and it runs from around Point O' Woods to Davis Park and it is only one of two such forests in the known world. I think this makes Fire Island the most significant park or place anywhere in the USA and as such, the NPS should never abandon Fire Island or ever let it fall into ruin. It is a national treasure and deserves to be treated as such - Congress should continue to fund the Fire Island National Seashore and increase its budget so it may take a more aggressive role in the maintenance program of its infrastructure.

Comments:

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 65

Author Information

Keep Private: No
Name: George Spanakos
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Ocean Bay Park, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

We prefer Alternate Plan #3. It provides the needed resources to ensure that Fire Island and the surrounding communities will be able to improve in the coming years to best prepare for the effects of climate change and stronger storms. It provides that the fire island communities and the natural wildlife such as bird, fish, deer etc. can continue to co-exist well into the future.

Comments: My family are members of the Ocean Bay Park community for over 30 years and we have enjoyed the beauty and a natural tranquility that Fire Island offers. We believe that without Alternate plan 3, that this tranquil co-existence will disappear due to serious impact of climate change. We hope that the shoreline of fire island will be improved upon so that to ensure that all future visitors and families will be able to enjoy the natural beauty that is Fire Island.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 66

Author Information

Keep Private: No
Name: Maryellen P. Cilizza
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Marlborough, CT 06447
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I like alternative #3RecogniInf the Relationship between Human Use and Nature. We must consider both the human history and the seashore experience when making any plans for the future of Fire Island. It has both historical and cultural history that should co-exist with natural resource management. Seashore should work to restore the Sunken Forest and other maritime forests on Fire Island, improve water quality through the development of wastewater management plan and engage in more intensive management of non-native invasive species.

Topic Question 2:

Offer a more integrated approach to the visitor experience to Fire Island including the lighthouse , Sunken Forest and the William Floyd estate
Preserve and rehab historic sites

Topic Question 3:

land use and development proposals including technical assistance to Fire Island communities to,identify and preserve their distinctive community character and revisions to,land use regulations including alternatives to traditional zoning would be of long term benefit to the overall character of Fire Island. Commitment to cooperative stewardship is of the utmost importance

Comments:

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 67

Author Information

Keep Private: No
Name: Edward P. Romaine
Organization: Town of Brookhaven
Organization Type: I - Unaffiliated Individual
Address: One Independence Hill
Farmingville, NY 11738
Farmingville, NY 11738
USA

E-mail:

Correspondence Text

Mr. Jonathon Jarvis
Director, National Park Service
1849 C Street NW
Washington, DC 20240

RE: Comments from the Town of Brookhaven on the draft Fire Island National Seashore General Management Plan

Environmental comments:

The original intent of the creation of the Fire Island National Seashore by the U.S. Congress in 1964 identified primary goals of preserving and protecting the islands magnificent natural environment. Fire Island was recognized as a national treasure, one to be preserved for generations of Americans. These goals had widespread support and we believe they continue to have strong support.

The Town encourages the National Park Service to focus this Plan on identifying threats to the goal of protecting and preserving the natural resources on Fire Island for current and future generations. Threats we are aware of include groundwater quality, surface water quality (both freshwater and saltwater), loss of submerged aquatic vegetation, the recognition of natural shoreline processes such as the new inlet in the Wilderness Area and the environmental benefits derived from clean ocean water flushing out Great South Bay, and the vulnerability of the barrier island to sea level rise.

Since the creation of the National Seashore there has existed a tension between local governments with responsibilities to the communities on Fire Island, and the National Park Service. As noted and elaborated on below, the Town believes that greater collaboration is necessary to achieve both the protection of natural resources and the recognition of the traditions and values of the communities. Greater collaboration might take the form of a commission or advisory group with representatives of the involved agencies that would have a mission of creating a cohesive set of recommendations and standards to address concerns about overdevelopment within the communities.

Planning comments:

Chapter II, alternatives and their common elements

Section - On page 63 under the management alternative 1: continuation of current management practices (no action alternative), the Land-Use Regulation of Properties within the Community Development District states that land use and development within the Community Development District would continue to be guided by existing local plans and regulated

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by local zoning as adopted by the towns of Islip and Brookhaven and the villages of Ocean Beach and Saltaire, as consistent with the 1991 Secretarys zoning standards. All parties would continue to rely on the NYS Coastal Erosion Hazard Area Act as administered by state and local authorities. The National Park Service (NPS) would continue to review applications for variances, exceptions, permits for commercial or industrial use, or special permit submitted to the zoning authority and provide a written response indicating whether the proposal conforms to the Secretarys zoning standards or the purposes of the Seashores enabling legislation. Frequently the findings and recommendations of the Seashore are not wholly considered by the local zoning authorities, and developments that are not in compliance with the Secretarys zoning standards have been granted variances and permitted by local jurisdictions.

The plan states that the findings and recommendations of the Seashore are frequently not wholly considered by the local zoning authorities, and developments that are not in compliance with the Secretarys zoning standards have been granted variances and permitted by local jurisdictions. Further, in the Executive Summary (vii), the plan indicates the practice of granting variances is widespread, even when NPS has noted its objection&.and the towns and villages grant variances based on precedent, making it very difficult to deny subsequent applications& Precedent does play a role in the Boards deliberations, but many other factors are considered; the Board looks at the application as a whole based on Town law 267, weighing the benefit to the applicant against the detriment to the neighborhood. Further, the Town enjoys the benefit of discussing the merits of an application at a public hearing, wherein the Board receives correspondence from the Park Service, but also hears testimony from the applicant, local civic groups, and the Town Department of Environmental Protection, which the NPS cannot benefit from unless attending public hearings. For example, there have been numerous objections to lot occupancy made by the NPS, but the Zoning Board does not hear variances for same due to the fact that these lot occupancies were legally permitted despite being over the 35% mximum permitted.

Comments

Consultation and findings from the Park Superintendent have been extremely beneficial to the Town Zoning Board of Appeals in coming to its conclusions rendering decisions on variance relief.

" The NPS must acquire a pragmatic understanding of the variance process. Recommendations of the NPS are given great weight during the hearing process. However, zoning board grants of minor variances do not indicate that NPS recommendations have not been considered. Further, the jurisdiction of a local Board of Appeals is derived from the denial issued by the local code enforcement officer and a zoning board cannot consider a matter not before it. As a result, NPS objections to matters not before the Board cannot be considered.

" The NPS should consider participating in the hearing process, as a supplement to providing only written comments, to establish a sustainable record supporting the Secretary's position.

" The NPS should encourage the local stakeholders to participate in the variance process, by encouraging participation in the hearing process and/or establishing local boards to consider such relief.

Section - Page 67 reveals the elements common to all action alternatives, and the plan indicates that current management practices would generally continue regardless of the management alternative adopted. Other Elements common to all action alternatives which is of critical importance to the Town Zoning Board is with regard to Land Use & Development illustrated on page 74, and include the following:

Community Character

The NPS would work collaboratively with other entities to encourage, support, and cooperate with Fire Island communities and the towns of Islip and Brookhaven to assist in the identification and preservation of the distinctive character of each Fire Island community and of Fire Island as a whole. NPS involvement would largely take the form of research, technical assistance, and interpretation, and in support of local community visioning or hamlet planning efforts.

Comment - The Town of Brookhaven Zoning Board of Appeals encourages such collaboration. The Board has in the past reached out and met with NPS employees and Fire Island civics both in the office and the field to establish collaboration and

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

discuss issues and concerns with regard to land use applications before the Board.

Section - Revise Land-Use Regulations

Working in collaboration with Fire Island stakeholders, the NPS would revise the Secretary's zoning standards guiding land use and development and subsequently local land-use regulations to address inconsistencies, provide greater specificity and/or guidance, and define with greater clarity the role of the NPS. Alternatives to traditional zoning (e.g., performance based measures, etc.) would be considered. Revised land-use regulations would articulate the standards to be met for a variance, outline a clear review process, and clearly describe how inconsistent developments would be addressed, on the local or federal level, or both. The NPS would also work with state and local interests to improve the development process making it more transparent and predictable. Information about the development process including necessary reviews, permitting, certifications, and the status of active proposals should be readily available to the public.

Comment: As indicated in the plan, a revision of the Secretary of the Interiors zoning land use would ultimately amend the Town of Brookhaven land use regulations. The plan states the goal would be to eliminate inconsistencies, provide greater specificity and guidance, and clarify the role of the NPS.

" The NPS should establish a working relationship with building departments and/or enforcement officers to create a concise and consistent framework under which applications are handled and denials are issued.

" In revising federal land use regulations, the NPS should consider establishing maximum variance relief limits.

" The NPS should encourage the establishment of local zoning boards to hear some or all variance requests.

" Consistency of the area of Federal jurisdiction would facilitate consistency in the variance process.

Section - Zoning Workshops

New York State law requires that members of local planning and zoning boards obtain four hours of training annually. Town, village and city zoning boards of appeal and planning board members, as well as county planning board members must receive training. NPS would offer trainings for its management partners and relevant local boards with regard to the application of the Secretary's zoning standards on a regular schedule - perhaps biannually, or as board membership turns over.

Comment: The Board of Zoning Appeals has, in accordance with New York State Law, obtained the requisite training requirements and beyond by virtue of both state and local training seminars. This training has been extremely beneficial to both new and incumbent board members alike for both general land use information and more specific classes specializing on specific planning and zoning topics. Unfortunately, none of these seminars have addressed federal law and issues pertaining to Fire Island and the Town encourages the goal of training local boards and staff on the federal zoning standards.

" The NPS should encourage participation and attendance at workshops of local stakeholders and/or land use representatives

" The NPS should consider local guided walks of each community

" Consistency in the application of the local and federal statutes to Fire Island can be achieved by quarterly meetings attended by a representative of all involved jurisdictions (Towns of Brookhaven and Islip, Villages of Bellport, Saltaire and Ocean Beach) with the NPS, for the purpose of education, communication and candid discussion of recently decided applications.

Section - Realign the Dune District with CEHA

The NPS would pursue the realignment of the Dune District to be either coincident with the NYS CEHA or dropped entirely, wherein CEHA would become the officially designated/legislated line for federal zoning purposes. Presently, both state and federal designations are intended to protect the protective feature, the primary dune, from inappropriate developments. Per 36 CFR Part 28.3(d), The Dune District extends from the mean high water line to 40 feet landward of the primary dune crest as mapped in 1976 and adopted by Congress in 1978, and described on a map entitled Fire Island National Seashore Map

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#OGP-0004. The CEHA line is described under NYS law as including the near shore, beach and dunes to a northern boundary line measured 25 feet landward of the landward toe of the primary dune.

Comment: by definition in the plan, the Dune district encompasses the area extending from the mean high water line to 40 feet landward of the primary natural high dune crest as it was mapped in 1976 and adopted by Congress in 1978. The plan further indicates that is outdated, and still used by the park to evaluate development within the district (Chapter II pg. 42). Acknowledging that the Dune District is outdated and with beach replenishment projects ongoing, consistency with CEHA would appear to be warranted. Further, if the dune district is co-terminus with CEHA, dropping it altogether may be appropriate to eliminate confusion and discrepancies, as long as there is no adverse impact to the environment. Further, the Town of Brookhaven has a Ocean front Dune District ordinance, wherein section 85-379 of town code reveals that The provisions of this section shall apply to that area of the Great South Beach extending from the mean high tide mark landward to the crest of the primary dune as defined by the Fire Island National Seashore on OGP-0004 and on Suffolk County Property Maps, Section Nos. 985.70 through 987 (Brookhaven), as mapped in November 1976, and landward an additional 40 feet beyond the crest of the primary dune. If the Dune District is eliminated in the federal ordinance, same would be required in Town code.

Sincerely,
Edward P. Romaine, Supervisor
Town of Brookhaven

Cc: Senator Charles Schumer
Senator Kirsten Gillibrand
Representative Lee Zeldin
Sally Jewel, Secretary of the Interior
Karl Christopher Soller, Superintendent FI National Seashore
Mike Caldwell, Regional Director, National Park Service

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 68

Author Information

Keep Private: No
Name: Daniel Priest
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Bay Shore, NY 11706
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

See Below

Topic Question 2:

See Below

Topic Question 3:

Alternative 3 is acceptable. However NPS assuming a leadership role in the seventeen communities is unacceptable. In 1964 when the FINS was founded the 17 communities were recognized as a separate entity excluded from Federal control and it should stay that way. We do not in any way want the federal government involved with the 17 communities

Comments: We have had a house on the beach for 30 years and Chris Soller is the best Superintendent we have seen. He recognizes that the 17 communities are part of the seashore and they must be considered in preserving the environment.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 69

Author Information

Keep Private: No
Name: John A. Gellatly
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Brightwaters, NY 11718
Fair Harbor Fire island, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:

I support Action Alternative #3 for Fire Island under the proposed GMP, which recognizes Fire Island's unique natural landscape with a strong connection to its residential communities - which predated the creation of FINS.

Topic Question 2:

No

Topic Question 3:

No

Comments: I have been a full-time resident of Fire Island for thirty years, after first discovering it as a summer visitor in 1970. Over that period I have actively worked to promote the health and safety of island residents as a member of the Fair Harbor Fire Department. In addition, I was instrumental in raising community support for a dune replenishment effort in 1994 following two major storm seasons that decimated parts of our island. I've learned through these efforts how important it is for all stakeholders on Fire Island to work together to maintain both the shoreline and the island's distinct character. Action Alternative #3 of the GMP is the only option that promotes cooperative stewardship between FINS and the communities which I believe is the best way to preserve Fire Island for future generations.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 70

Author Information

Keep Private: No
Name: jeanette neff
Organization:
Organization Type: I - Unaffiliated Individual
Address:
bayshore, NY 11706
USA
E-mail:

Correspondence Text

Topic Question 1:

I prefer proposal 1 which would continue to serve the Fire Island communities as it has done effectively for years. I am against the involvement of NPS partnering and/or making decisions with FIA.

Comments:

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 71

Author Information

Keep Private: No
Name: NORMAN LEVINE
Organization: DUNEWOOD PROPERTY OWNERS ASSN
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
DUNEWOOD, NY 33484
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
I AGREE WITH PROPOSAL 1.
IT LEAVES EACH COMMUNITY WITH THE OPTION TO SOLVE THEIR OWN INDIVIDUAL PROBLEMS.

Topic Question 2:
LEAVE THINGS THE WAY THEY ARE.
LET EACH COMMUNITY SOLVE THEIR INDIVIDUAL PROBLEMS...AND NOT HAVE ISLIP OR THE FI PARK SERVICE MAKE SWEEPING REGULATIONS THAT SIMARLY EFFECT ALL THE FIRE ISLAND COMMUNITIES SIMILARLY.

Topic Question 3:
GRANDIOSE...AND WILL INCREASE GOVERNMENT'S CONTROL OF THE ISLAND AND IT'S COMMUNITIES, THEREBY DIMINISHING THE ISLAND'S INDIVIDUAL COMMUNITY CONTROL OF THEIR OWN COMMUNITIES AND PROBLEMS.

Comments: THANK YOU ALLOWING OUR INDIVIDUAL INPUT RE THESE PROPOSALS

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 72

Author Information

Keep Private: No
Name: ZELDA LEVINE
Organization: DUNEWOOD PROPERTY OWNERS ASSN
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
DUNEWOOD, NY 33484
USA
E-mail: [REDACTED]

Correspondence Text

Topic Question 1:
I AGREE WITH PROPOSAL 1.
IT LEAVES EACH COMMUNITY WITH THE OPTION TO SOLVE THEIR OWN INDIVIDUAL PROBLEMS.

Topic Question 2:
LEAVE THINGS THE WAY THEY ARE.
LET EACH COMMUNITY SOLVE THEIR INDIVIDUAL PROBLEMS...AND NOT HAVE ISLIP OR THE FI PARK SERVICE MAKE SWEEPING REGULATIONS THAT SIMARLY EFFECT ALL THE FIRE ISLAND COMMUNITIES SIMILARLY.

Topic Question 3:
GRANDIOSE...AND WILL INCREASE GOVERNMENT'S CONTROL OF THE ISLAND AND IT'S COMMUNITIES, THEREBY DIMINISHING THE ISLAND'S INDIVIDUAL COMMUNITY CONTROL OF THEIR OWN COMMUNITIES AND PROBLEMS.

Comments: THANK YOU ALLOWING OUR INDIVIDUAL INPUT RE THESE PROPOSALS

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 73

Author Information

Keep Private: No
Name: Enrico G. Nardone
Organization: Seatuck Environmental Association
Organization Type: I - Unaffiliated Individual
Address: PO Box 31 Islip NY 11751
Islip, NY 11751
USA
E-mail: egnardone@seatuck.org

Correspondence Text

Jonathan Jarvis
Director, National Park Service
1849 C Street NW
Washington, DC 20240

Dear Director Jarvis:

On behalf of the Board of Directors and hundreds of members of the Seatuck Environmental Association ("Seatuck"), I am writing to submit comments on the Draft Fire Island General Management Plan ("GMP"). Seatuck is a non-profit 501(c)(3) organization, founded in 1989, dedicated to conserving Long Island wildlife and the environment. In pursuit of our mission we advocate for conservation policy, conduct citizen-science research projects and offer a wide-ranging environmental education program, including the operation of several public nature centers. Two of our facilities, including our main office at the Suffolk County Environmental Center, are located on the South Shore in Islip, directly across the Great South Bay from Fire Island.

I. GENERAL COMMENTS

A. Conservation as Primary Purpose

The Fire Island National Seashore ("National Seashore") was formed in 1964 with lofty goals. While the interests involved were many and the motivations varied, the overwhelming desire - from Congress to local village officials, from the Sierra Club to the Beach Buggy Association, and from the Fire Island Homeowners Association to the Garden Club of America - was to preserve and protect the island's magnificent natural environment. Fire Island was recognized as a national treasure, one to be preserved for generations of Americans. As Newsday editorialized at the time: "The last great barrier beach in the Northeast not already built upon is to be saved for the people of the United States." ("At Last, a Fire Island Bill," Newsday, August 22, 1964.)

While there was interest in ensuring the National Seashore provided broad recreational opportunities and recognized the rights of private landowners, it was clear that such uses were secondary to, and should not interfere with, the public's primary interest in protecting Fire Island's natural resources. The wilderness movement of the era, the threat of overdevelopment, and a host of visionary leaders ensured that the National Park Service (NPS) had a clear mandate to focus on conservation. The preamble statement to the National Seashore's 1964 enabling legislation codified this intent, stating its purpose as "conserving and preserving for the use of future generations certain relatively unspoiled and undeveloped beaches, dunes and other natural features."

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Much has changed in the past five decades. There has been a significant growth in summer residents, renters and visitors, and an increased appreciation of Fire Island's cultural heritage. But the need to prioritize natural resource conservation remains. More than ever, the island is recognized as a nationally significant ecological resource. It provides important wildlife habitat for a great diversity of resident and migratory species. It serves as a vital barrier that safeguards the Great South Bay and the mainland of Long Island. And it's a world-class destination where people can experience the beauty, solitude and wildness of a vast barrier beach.

While cultural and residential aspects of Fire Island are important, it's critical to remember that the vast majority of Long Islanders, New Yorkers and Americans derive benefits from the National Seashore as a natural resource. Few of these people regularly visit Fire Island and fewer ever spend the night. They may own a home or business near the water on mainland Long Island. They may go birding or fishing on or around Fire Island. Maybe they drive to Robert Moses to watch the sunset or make an occasional family visit to Sailor's Haven. Or maybe they're commercial baymen trying to eek out a living on the increasingly impaired Great South Bay. It is these people-the vast majority of citizens-that the natural resources of Fire Island serve. And it's their interests that must drive policy making at the National Seashore.

Fire Island remains as significant a natural resource as ever. A clear choice was made in 1964, and that choice remains clear today: Fire Island must be managed, first and foremost, as a natural resource. The new GMP should in no way reduce or alter this historic and necessary primary purpose.

B. Cultural Focus Should Not Undermine Seashore's Primary Purpose

Alternatives #1 and #2, which both emphasize the protection of natural resources, appear to be in line with the original intent of Congress in creating the National Seashore. They emphasize the very thing, natural resources, that Congress prioritized and charged NPS with protecting. If Alternative #3, on the other hand, would result in less focus on natural resources, then it would seem a clear diversion from, and even a violation of, Congressional intent.

It's not clear to us why acknowledging that Fire Island is a "natural landscape with a significant cultural overlay" must necessarily (at least theoretically) result in reduced emphasis on natural resources. It appears to be a false choice, perhaps forced by the necessity to create alternatives in the GMP process. It seems possible to recognize Fire Island's cultural overlay and devote attention to it as an additional focus without undermining the primary purpose of natural resource protection. The real issue may be that, in practice, resources are limited and NPS feels obligated to make choices.

In an era of tight federal budgets this may, in fact, be the reality. Perhaps NPS can't expand its focus to include cultural resources while maintaining its commitment to natural resources. However, we assert that any effort to pay greater attention to cultural resources must not come at the expense of NPS's primary role to protect the island's natural resources.

C. Collaborative Efforts Should Not Reduce NPS Responsibilities

As discussed below, Seatuck supports efforts to "turn the page" at Fire Island and explore options for collaborative management and participatory governance. The paradigm that was established in 1964 (and tweaked through the decades) to manage the built-in conflict between the Congressional conservation directive and the reality of ongoing development has not, by any measure, been successful. We could support efforts to improve the federal zoning standards and the development process, especially if more effective limitations on new construction and expansions were imposed. We would certainly support expanded authority for NPS to use regulatory and legal tools, short of condemnation, to control development, limit population density and protect natural resources. We strongly caution, however, that efforts to adopt a new management paradigm not reduce or weaken the primary role and responsibility of NPS to safeguard Fire Island's natural resources on behalf of all Americans. While we support collaboration, NPS cannot eschew its primary role and responsibility to manage Fire Island, control development and protect natural resources.

D. Over-Development Threatens Purpose of National Seashore

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Seatuck respects the rights of private landowners on Fire Island and recognizes the important historical and cultural significance of the island's residential communities. We understand the desire to live or vacation in such a magnificent setting - people around the world are lured to live near the ocean. For those that can afford it, it is a wonderful opportunity - and a privilege. We don't begrudge the interest of homeowners to responsibly improve their properties to make them more comfortable, even more accommodating for family and friends.

That said, we also recognize that the development that has taken place in the communities over the past fifty years has been excessive. It threatens to undermine the very natural resource values that make Fire Island so important. Curtailing continued over-development should be a high priority in this GMP.

The harm from new construction and house expansions comes from their accumulation, from the fact that they combine to allow more and more people to live on and visit the island. This increased density puts an ever-growing stress on the island and its natural resources. Greater housing density, for example, results in more human waste in on-site septic systems, which remain primitive in many cases. In the sandy soils of Fire Island, this results in more nitrogen easily seeping into the water table and out into the Great South Bay. We know that this excess nitrogen causes algal blooms, degrades water quality and is one of the major culprits plaguing Long Island's estuaries. While the Great South Bay's water quality problems cannot be fully blamed on Fire Island, there is no doubt that nitrogen from the residential communities has significant localized impacts in the bays and coves on Fire Island's north shore.

But nitrogen isn't the only problem. Greater density means more storm runoff, more landscaping pesticides and more fuel from boats - all of which contribute pollutants into the island's groundwater and the surrounding waterways. This pollution impacts everything from eelgrass beds to clam and fish populations to swimming safety, directly undermining some of the very values that Congress sought to protect in creating the National Seashore.

Greater density also generates a greater demand for housing, services and supporting infrastructure, which, on an island susceptible to dramatic impacts by storms (especially in an era of rising sea levels), puts more public and private investment in harm's way. The more people that live and build on the island, the more demand there is for protection for beaches, property and infrastructure. These costly measures, which in some cases will be borne by the public, aren't central to the general public's interest in the island's natural resources. In fact, in some cases, they run counter to it. For example, the installation of bulkheads in an attempt to protect bay side homes will destroy important habitat for a variety of wildlife, including horseshoe crabs and dozens of shorebird species. Similarly, efforts to stabilize and harden the shorelines will impede the island's natural ability to adjust to sea-level rise.

Bit by bit, ongoing development on Fire Island fosters continued population growth. This burgeoning population increases demands on the island and stresses its natural systems. We support the continued existence of the residential communities on Fire Island and responsible private ownership. But NPS must ensure that these uses don't undermine the very qualities that make Fire Island so special and that the National Seashore was established to protect.

II. SPECIFIC COMMENTS

Management Goals

While Seatuck generally supports the GMP's broad management goals (p. 38), the goal of natural resource protection should be listed as the first and highest priority. We also recommend that the "Land Use and Development" goal be amended to more specifically control residential density and housing capacity. We understand the need to acknowledge and respect the residential communities and their unique character, and understand that they will continue to exist. However, it is imperative that this GMP turns a page and starts a new chapter in the management of Fire Island. It must clearly and unequivocally seek to reign in the development and increasing density that has characterized the past 50 years.

Management Areas

Natural Resource Areas - Seatuck supports the purchase of improved properties within the natural resource areas and is willing to campaign for increased Congressional funding for such targeted acquisitions (p. 47).

Island Community Areas - Residential development over the past 50 years has rarely been low profile or consistent with zoning standards, as this section claims (p. 51). The zoning standards (implicitly agreed to by all private owners in exchange for keeping property inside a national park) have simply not achieved their goal of bringing all structures into conformity over time. As stated above, it is imperative that this GMP turns a page and ushers in an era in which development is more effectively controlled. Seatuck supports an approach that would limit the significant expansion of residential living space and lot coverage, or construction that otherwise has a demonstrable negative impact on the island's natural resources. We also support a return to the NPS acquisition program, especially in sensitive ecological areas, and a policy to prohibit the rebuilding of structures in targeted areas that are completely destroyed by storms.

Wilderness Area - The establishment of the Otis Pike Fire Island High Dune Wilderness is one of the great achievements on Fire Island. Seatuck supports all efforts to keep the area truly wild, with the exception of the manual maintenance of a minimal lateral trail to afford visitors low-impact access to the unique habitats and wildlife species that exist between the dunes and the bay.

Shoreline Management

Seatuck welcomes and supports the NPS acknowledgement of a need to transition from the current practice of beach nourishment to a more natural beach and dune system (p. 58). Until such a program is implemented, we support the completion of a programmatic environmental impact statement to consider the broad impacts (including off-shore impacts) of beach nourishment on Fire Island and the completion of detailed environmental assessments to evaluate specific projects. We also urge that any sand removal and beach nourishment policies be based on the most up-to-date understanding of offshore sand resources and sediment transport, specifically including information from the U.S. Geological Survey's ongoing studies.

Natural Resource Management

Protected Species - In many instances, the differences between the alternatives is unclear and confusing. For example, in Alternative #1, the GMP contains a section labeled "Threatened and Endangered Species" in which it indicates that "NPS would continue its collaborative efforts to preserve and monitor critical habitats and open spaces" for the protection of listed species. It indicates that NPS would 1) seek to update its plan for listed species to address the impacts of climate change and sea-level rise, 2) continue to monitor and protect germination and nesting areas, and 3) work with partners to address conservation goals for Species of Special Concern. However, Alternative #2, which ostensibly places greater emphasis on conservation goals, doesn't appear to include similar commitments to listed species. In fact, Alternative #2 is completely silent as to listed species (except for the single sentence contained in the "Common Elements" section that promises research regarding the impact of human disturbance on listed species.) As an organization dedicated to the conservation of Long Island wildlife, Seatuck strongly supports the continued commitment to federal and state threatened and endangered species, as well as species of special concern. These species are often the "canaries in the coal mine," their difficulties indicative of larger ecosystem problems.

Native Species - Seatuck strongly supports the proposal, contained in Alternative #2, to restore native plant species, including the establishment of a propagation and education program. Science is only beginning to understand the complex, interconnected relationships between native plants and insects, birds and other wildlife species. The connection between milkweed and monarch butterflies is only one example of how native plants directly support wildlife. Seatuck's native-plant based landscaping plan at the Suffolk County Environmental Center has, in only a few years, attracted tremendous numbers and a great diversity of insects. We would endorse a strategy to encourage, or even require, native plantings across the island, including in the residential communities. The commitment in Alternative #1 to maintain "viable populations" does not go far enough to promote and restore native plants. And it appears there would be no commitment of any kind to native plant populations under Alternative #3. If true, this would be an unacceptable retreat from what is being increasingly recognized as

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a fundamental, best-practice element of natural resource management.

While some native species need restoration others need strong management. Fire Island, like parts of mainland Long Island, must address the unsustainably large white-tailed deer herd. In many places the deer are having a devastating impact on the ecological health of upland habitats. Their impact is especially serious in woodland areas where they alter forest composition by selective feeding on saplings, and where they destroy the diversity and density of the understory. Their impacts negatively affect a wide range of bird and other species. Of course, as the primary vector for adult deer and Lonestar ticks, the deer also play a major role in the proliferation of tick-borne diseases. For these reasons, Seatuck strongly encourages NPS to take steps to control the burgeoning white-tailed deer herd at Fire Island.

Non-native Species - We support the approach, contained in Alternative #1, to control non-native invasive species that pose a threat to native species and other natural resources within the Seashore. The strategies of "cooperation and collaboration, inventory and monitoring, prevention, early detection and rapid response, treatment and control, and restoration" are realistic and reasonable. The proposal in Alternative #2 to fully eradicate invasive non-native plant species seems overly ambitious and impractical. It would require a Herculean effort that would divert resources away from other important habitat restoration and protection efforts. Again, Alternative #3 is silent as to invasive species; the elimination of a program of containment and control (as contained in Alternative #1) would represent an unacceptable retreat from a basic tenant of natural resource protection.

Ticks & Mosquitoes - Regarding mosquitoes, Seatuck supports the strategy, contained in Alternatives #1 and #2, to limit the application of pesticides to situations where there is a demonstrable risk to public health. It is our position that the spraying of broad-spectrum pesticides is unacceptable as a strategy to reduce nuisance mosquitoes. The proposal to revise the mosquito protocols contained in Alternative #3 seem unnecessary and would likely lead to the increased application of pesticides and result in negative impacts to natural resources. Regarding the tick risk, Seatuck would support a more proactive approach, such as that suggested in Alternative #3, especially given the more consistent disease risk from ticks and the ability to restrict treatments from aquatic habitats.

Natural Lightscape - While night sky concerns seem technically dismissed from consideration in the GMP (p. 34), Seatuck strongly supports the proposal contained in Alternative #1 to minimize or reconfigure artificial light sources to protect dark skies on Fire Island (p. 56). The benefits of dark skies to wildlife are well documented and should be part of the overall management strategy on Fire Island.

Marine Resources - Seatuck supports the commitment, outlined in Alternative #1, to work with state and local agencies to ensure the protection of freshwater wetlands and salt marshes (p. 56). Alternatives #2 and #3 do not appear to contain similar commitments - an unacceptable omission. We also support the careful protection of finfish and shellfish populations within the National Seashore's jurisdiction. In particular, we urge NPS to maintain its current ban on horseshoe crab harvest, which is helping to protect local populations of an ecologically important and still poorly understood species. We are similarly supportive of the proposal in Alternative #2 to inventory, monitor, research, control and, where appropriate, eradicate non-native invasive marine species that are negatively impacting marine habitats (p. 80).

Water Resources - Seatuck supports any initiative to address the wastewater issue on Fire Island (p. 71), as nitrogen from on-site septic systems contributed to the shallow barrier island aquifer is arguably the most serious environmental threat raised by the extensive development. While studies are valuable, Seatuck urges NPS to take a more aggressive leadership role to address the nitrogen issue. We urge NPS to lead by example by installing innovative alternative treatment units ("ATUs") that remove nitrogen from wastewater on federal properties as soon as possible. NPS should also seek to promote the installation of ATUs across the island, including exploring ways to mandate their inclusion in development projects and identifying areas for the installation of community package systems.

Land-Use and Development / Cooperative Stewardship

The sections related to land-use and development are arguably the GMP's most important, as development is the most significant threat to Fire Island's natural resources. Despite this, the differences between the alternatives regarding land-use

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and development are difficult to parse. The "Common Elements" section makes it clear that NPS does not intend to continue "business as usual," that it instead plans a revision of the zoning standards and an overhaul of the development process. However, under Alternative #1, the GMP states that land use within the communities would continue as it has in the past. Alternatives #2 and #3 are silent as to land-use and development, creating more confusion about the GMP options.

The crux of the GMP's treatment of land use and development matters seems contained in the "Common Elements" section, both in the "Land Use & Development" and the "Park Administration / Cooperative Stewardship" sections. In these sections the GMP proposes various approaches to improve the overall management of development on Fire Island.

In general, as discussed above, Seatuck recognizes that the efforts to control development, to limit population density and to fully protect the island's natural resources have not been a great success over the past 50 years. The reasons for this failure seem varied and complex. And from Congress to NPS to local officials, there appears to be plenty of blame to go around.

Seatuck has lost confidence that the existing can adequately protect the natural resources of Fire Island, especially during an era in which climate change will make issues more pressing and consensus more elusive. Given this reality, Seatuck supports an effort to try something new.

We support an effort to revise the land-use regulations to "articulate the standards to be met for a variance, outline a clear review process, and clearly describe how inconsistent developments would be addressed" and to make the development process "more transparent and predictable" (p. 78). We recommend that NPS consider setting maximum limits for variance relief and explore ways to build in mitigation for the direct environmental impacts of development. For example, as mentioned above, new land-use regulations could require that significant expansions of residential living space trigger a requirement for an upgrade to alternative treatment units ("ATUs") that remove nitrogen from the waste stream. We also encourage NPS to encourage compliance with zoning regulations by publishing a searchable list of properties for which it has issued "subject to condemnation" letters.

Seatuck also supports the notion of cooperative stewardship and participatory ecological governance (p. 76-77). Both the re-establishment of the Fire Island National Seashore Advisory Commission and the Fire Island Management Partnership seem like viable avenues that warrant further consideration. In either case, it is imperative that NPS not retreat from its primary role in safeguarding Fire Island's natural resources, especially with regard to controlling development and limiting population density.

Transportation

Seatuck supports efforts to reduce vehicle driving on the beaches at Fire Island. While we recognize the occasional need for emergency vehicles and law enforcement to use the beach, the sands of the beach should not become the primary option for the regular, everyday transportation needs of year-round residents, contractors, utility employees, etc. The increased traffic impacts wildlife, potentially contributes to erosion, especially in cross-over areas, and degrades the "wild" appearance and experience for beachgoers.

Education

Seatuck supports any and all NPS efforts to provide education about the geology, ecology and wildlife of Fire Island (p. 55, 74 & 89). We often repeat the mantra, first coined by Senegalese conservationist Baba Dioum, that support for conservation begins with an understanding of the natural world. Specifically, we support the proposal to provide education about climate change, how it will impact Fire Island and how visitors can help respond (p. 42). However, we strongly encourage NPS to focus this educational effort (as the Just:Us Coalition has proposed) on the private landowners within the residential communities, as well as on local building and zoning officials. Future management of the Fire Island would benefit greatly if these individuals were versed in not only the rights and responsibilities of residing within a National Seashore, but also the realities of living with climate change on an ephemeral barrier island.

Seatuck also supports the proposal in Alternative #3 to reestablish a residential environmental program at the National Seashore (p. 89). In our public and school programs Seatuck educators regularly encounter people, especially grade school

students, who have never been to the beach. It is a sad reality that there are a great many people who live on Long Island who don't have the opportunity or the resources to experience its wonderful coastlines. A residential environmental program at Fire Island would be a tremendous way to share the beauty and wonder of the barrier island with those who might not otherwise have the opportunity. It could also be one small way to address the overwhelmingly white and non-Hispanic use of the National Seashore (p. 22).

Along these lines, Seatuck also supports the Alternative #1 proposal to expand citizen science programs at the National Seashore (p. 69). Seatuck has expanded its own citizen science projects over the past several years, including efforts to search for migrating alewives, monitor horseshoe crabs and survey dragonflies. We've found that such opportunities, which let people participate in research, work with experts and get their hands dirty, are excellent ways to develop valuable connections to the natural world.

* * * *

We strongly oppose any alternative or policy that would alter the primacy of environmental protection as the National Seashore's highest priority. While we recognize the significance of cultural resources and understand the interest in balancing the cultural overlay of human uses, the visionaries who founded the National Seashore were unequivocal in that Fire Island was, is and should always be, a natural resource to be protected and preserved for the American people. They were clear that recreational, as well as private residential and commercial use, should only be permitted to the extent they complied with the National Seashore's primary conservation purpose.

We also strongly urge the National Park Service to fully maintain its role as the primary guardian of the National Seashore's natural resources, which includes taking a stronger position against overdevelopment within the residential communities. This development is the primary threat to Fire Island, putting the natural resources that make it so unique and prized in peril.

Seatuck is grateful for the opportunity to comment on the Draft General Management Plan. We look forward to staying engaged in the process as a new plan is finalized and implemented and to being a part of Fire Island's next chapter.

Please let us know if you have any questions or require additional information.

Very truly yours,

Enrico Nardone
Executive Director
Seatuck Environmental Association
(631) 581-6908
egnardone@seatuck.org

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 74

Author Information

Keep Private: No
Name: DJ Schubert
Organization: Animal Welfare Institute
Organization Type: I - Unaffiliated Individual
Address: 202 Cranberry Court
Egg Harbor Township, NJ 08234-4948
USA
E-mail: dj@awionline.org

Correspondence Text

Topic Question 1:
See comments below

Topic Question 2:
See comments below

Topic Question 3:
See comments below

Comments: September 17, 2015
BY ELECTRONIC MAIL
Superintendent, Fire Island National
Seashore, 120 Laurel Street
Patchogue, NY 11772

Dear Superintendent:

On behalf of the Animal Welfare Institute (AWI), I submit the following comments on the Fire Island National Seashore (FINS) General Management Plan/Environmental Impact Statement (GMP/EIS) (80 Fed Reg 34692).

The GMP/EIS is required to provide the foundation for more detailed and issue-specific plans for FINS. To be consistent with National Park Service policies (as contained in the NPS Management Polices published in 2006), FINS now must develop Program Management Plans followed by Strategic Plans before it can pursue the creation of Implementation Plans. The draft deer management plan that FINS published in 2014 represents an Implementation Plan and, given the hierarchy of NPS planning documents articulated in NPS policies, its preparation and publication was premature as other planning steps were not previously completed. AWI encourages FINS to comply with the planning steps outlined in NPS policies so that future decisions made to manage deer, other species, or take other park-specific actions are based on the proper (and required) assemblage of planning documents.

Since the GMP/EIS is intended to provide an overarching and broad view of FINS management that will guide other decisions and actions over the next two decades it is understandable that it does not provide the level of detail that would be required in other plans required pursuant to NPS policies. Nevertheless, the GMP/EIS must provide sufficient detail to lay the foundation for more detailed management plans - including deer and vegetation management. Considering that the 2014 deer management plan proposed the lethal control of deer on FINS based on claims of deer impacts to vegetation, nuisance

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complaints of residents, and adverse interactions with park visitors it was expected that the GMP/EIS would provide more evidence to substantiate such claims (at least broadly) in order to set the foundation for future management decisions. The GMP/EIS, however, has few direct references to deer or any alleged impacts attributable to them on FINS suggesting that deer may not be the "problem" articulated in the deer management plan.

The GMP/EIS makes reference to a "deer and vegetation management plan" in at least three places (see pages 236, 237 and Appendix D page 16). Given the alleged impacts of deer on FINS vegetation including on the William Floyd Estate, AWI strongly supports the development of a plan that addresses deer and vegetation management in a single document. To do otherwise is to illegally segment two issues that are inextricably intertwined (see 40 CFR § 1502.4(a), 1502.25(a)(1-3), 1508.27(b)(7)). Indeed, considering the reported impact of invasive species, including invasive floral species, and the park's vegetation, FINS should consider developing a wildlife, invasive species, and vegetation management plan. Such a plan would require FINS to consider deer, vegetation, and invasive species management, all of which are interrelated, in a single holistic document. At present, however, FINS has only prepared a deer management plan - which does not incorporate vegetation or invasive species management practices, issues, and alternatives. Consequently, FINS should terminate the current deer management plan and initiate preparation of a deer and vegetation management plan as called for in the GMP/EIS. Should the NPS ignore this recommendation, upon completion of the GMP/EIS planning process it needs to, at a minimum, amend the deer management plan to reflect the GMP and republish the deer plan for a new round of public review and comment.

AWI notes that the GMP/EIS also briefly references raccoons as a native species potentially in need of management due to "nuisance" concerns and identifies mute swans as a non-native species in need of management. In both cases, however, the GMP/EIS contains no further information about these species, their alleged impacts to FINS ecology or on residents/visitors, and it provides no indication as to whether or when more specific plans for the management of these species will be developed for public review and input. The holistic plan suggested above would provide a platform to discuss the management of other species within FINS as well.

AWI is also concerned about the integration of a draft wilderness stewardship or management plan in to the GMP/EIS. This integration should not have been done and is likely not permissible under the hierarchical planning process of the NPS. Wilderness management is a critically important issue for FINS and the plan should have been subjected to its own stand-alone review and NEPA analysis. Just as the NPS has separately published a notice of intent to prepare breach management plan and EIS for public review and comment (80 Fed Reg 53886), it should separate the wilderness management plan from the GMP/EIS and subject the wilderness plan to independent NEPA analysis and make the plan and the NEPA review available for public comment.

AWI remains concerned about the proposal, contained in the deer management plan, that FINS may initiate lethal control of deer. Beyond the fact that the deer management plan, pursuant to NPS policies, was published prematurely, any effort to initiate lethal management of deer on FINS is unacceptable. In particular, considering that FINS successfully implemented a deer immunocontraceptive proposal for years before inappropriately and unnecessarily terminating the program so as to engage in deer management planning, FINS should not continue to pursue such an archaic and, arguably, illegal effort to kill deer. Instead, FINS has the opportunity to be a leader within the NPS to demonstrate that immunocontraception is a viable alternative to address deer density concerns when there is credible evidence that management action is required. Ultimately, the NPS, as is consistent with its fundamental responsibilities under its Organic Act should allow natural ecological processes, including natural species population dynamics, to dictate its management decisions intervening only when there is incontrovertible evidence that management action - preferably non-lethal - is necessary.

To facilitate the implementation of such a non-lethal deer management program (and in response to the broad questions posed on page iv of the GMP/EIS), AWI suggests the creation of an NPS/private citizen stakeholder group to explore the mechanisms that could be employed and how they could be funded to permit the resumption of immunocontraceptive treatments for deer on FINS. If such a stakeholder group were created, AWI would welcome that opportunity to participate and contribute its expertise to the group's discussions and deliberations.

Thank you in advance for considering this input. Should you have any questions or need additional information, please contact me at dj@awionline.org or, by telephone, at (609) 601-2875.

Sincerely,

DJ Schubert
Wildlife Biologist

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 75

Author Information

Keep Private: No
Name: Beatrice R. Kahn
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Ocean Bay Park, NY 11770
USA
E-mail: [REDACTED]

Correspondence Text

Ladies and Gentlemen,

As a homeowner and environmentalist, I urge you to proceed in a manner that protects the interests of both the people who live on Fire Island, including seasonal residents, and the natural elements. It is imperative that we preserve our environment. At the same time, it is imperative that you protect the thousands of families with long histories and considerable emotional and financial investments in their communities. My connection to Fire Island goes back almost 50 years. After happy childhood summers, I acquired my own house as an adult and now my children enjoy Fire Island as well. I hope that my grandchildren will have the same opportunity to grow up with Fire Island as a meaningful part of their lives - a place to unwind, to be part of community and to serve.

In no other community that I know of are residents asked to abandon their homes to make way for wilderness. Every inch of our earth was once precious wilderness, yet those in the suburbs and cities are not being forced out. Accordingly, I ask that you please do whatever is necessary to preserve human interests alongside flora and fauna. This necessitates rejecting option 2.

One way to balance human and environmental interests might be to assist residents in living in harmony with nature by disseminating information about best practices, and working with municipalities and building departments to make it possible to implement them. We try to reduce our impact on Fire Island through avoiding disposables, recycling, composting, limiting use of water, and naturally cooling our home, and are investigating solar panels, harvesting rainwater, and native and edible plantings. Although I investigated composting toilets and filtering grey water for non-potable use, I quickly realized they would never be approved by the authorities and abandoned the idea. Expert guidance on what could help create balance on Fire Island would be welcome.

We also enjoy the public facilities, particularly, Sailors Haven and Sunken Forest. It is important to preserve access to the seashore and to the unique environment for everybody. Removing public facilities, limiting educational opportunities, and imposing drastic travel restrictions would make Federal property on Fire Island available only to those with money - an inappropriate use of public funds.

After reading a substantial portion of the Draft GMP/EIS, I am still unclear about who will have decision making authority over important issues under option 3, and what their point of view on the issues is. Accordingly, I can say that I am opposed to option 2, but cannot endorse option 3 unless my concerns can be addressed.

I appreciate all NPS and its dedicated staff do to steward our precious island, and the work that went into the Draft GMP/EIS. I look forward to the collaboration that you propose.

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Respectfully submitted,
Beatrice Kahn

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 76

Author Information

Keep Private: No
Name: Bill Stegemann
Organization: Sierra Club, Long Island Group
Organization Type: I - Unaffiliated Individual
Address: P.O. Box 172, West Sayville, NY 11796-0172
West Islip, NY 11795
USA
E-mail: billstegemail@gmail.com

Correspondence Text

Fire Island National Seashore
General Management Plan (GMP)/Wilderness Stewardship Plan (WSP)

Comments from the Sierra Club, Long Island Group
(Member of the Fire Island Wilderness Coalition)

The Burma Road Trail - There are some unique challenges involved in visiting the Fire Island Wilderness. The Burma Road Trail was always part of the history of, and plan for, this wilderness. The plan recognizes the path of the Burma Road as "historic," yet more significance seems to be placed on historic telephone markers. Planners and advocates initially thought the boots of hikers would be all that was needed to maintain the trail. This is no longer an effective strategy and the trail is degrading. At points, visitors must exit the wilderness and hike on the Atlantic Ocean beach. Some recreational activities that occur on the beach are not permitted in designated wilderness areas. It's impossible for visitors to traverse the area to find "outstanding opportunities for solitude," a core tenet of the Wilderness Act.

Commercial ferry service is only available when the weather is warm-about 1/3 of the year. Before superstorm Sandy, the NPS website advised that visitors could hike into the wilderness year-round, but it's best to plan your trip for late fall through early spring, to avoid the ticks and mosquitoes" (screenshot available upon request). Sandy created a breach that cut off visitor access to roughly 80% of the area. Fewer visitors and no maintenance will mean further degradation of the trail.

The plan states that unspecified length of treadway at the trailheads and points of interest will be minimally maintained to a Class 1 standard of 0" - 12" wide. A trail that varies between Class 2 and 3 (in terms of width only) is essential to the character of the FI Wilderness and would allow visitors to discover more areas to choose their own path. With regard to points of interest, the spur trails to the bay, the freshwater pond and the transverse dunes at Old Inlet promise the type of scenic value the Wilderness Act seeks to preserve for the good of all people.

The NPS is rightfully proud of its work with volunteers. Engaging volunteers to assist with trail maintenance could be part of the longterm plan.

Potential Wilderness Additions - Since the structures at Old Inlet are gone, due to damage from superstorm Sandy, the area should now be designated as wilderness. Sandy also damaged the Smith Point Nature Trail. But in this area, a new boardwalk of roughly the same length was constructed nearer to the bay side. This, unfortunately, keeps this section of land in the potential wilderness category because the wilderness character of this area does not include boardwalks. The Watch Hill to Long Cove boardwalks were removed when the area was designated. As noted in the WSP, Portions of the [boardwalk] near the bay were destroyed by ice and were removed in 2000. This was in keeping with the wilderness character of the area as

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noted here: The area of 1 acre, more or less, including the boardwalk nature trail at Smith point and the boardwalk, dune crossing and bathhouse at Old Inlet will remain as potential wilderness until such time as existing non-conforming uses are terminated (Federal Register: October 12, 1999 (Volume 64, Number 196) Page 55308).


Mosquitoes - The NPS should undertake a study of the effectiveness of non-toxic alternatives for reducing mosquitoes.

Structure of the GMP/WSP - The WSP table of contents is different from the actual contents and there are no page numbers. We feel the WSP should have been a separate document.

Preferred Alternative - The primary goal for management should be the natural resources of Fire Island. The NPS should certainly work with the communities and other interested parties to achieve those goals, but for the most part, the cultural resources should be left to the communities themselves. The NPS Preferred Alternative should reflect that.

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 77

Author Information

Keep Private: No
Name: Bradlee UNK
Organization: Fire Island Wildlife Foundation  Official Rep.
Organization Type: P - Conservation/Preservation
Address: UNK
UNK, NY UNK
USA
E-mail:

Correspondence Text

A Message to the Park Service: "KEEP THE 4-POSTERS, THEY WORK!"

The federal government plans to prohibit the use of 4-Posters in National Parks depriving us of the only effective way to eliminate ticks and safeguard us from many dangerous tick-borne diseases.

It is proven that the 4-Poster protects you, your pets and wildlife by eliminating ticks in an environmentally safe way.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 78

Author Information

Keep Private: No
Name: Alan W. and Nancy J. Altman
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Ocean Beach, NY 11770
USA
E-mail:

Correspondence Text

Fire Island National Seashore GMP
15 State Street
Boston, MA 02109

Re: Fire Island National Seashore General Management Plan

To Whom This May Concern,

We are residents of the Hamlet of Robbins Rest, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS" or "Seashore"). We have been homeowners for more than 40 years.

The unique and special character of Fire Island has long been recognized and sought to be preserved by its residents. That recognition led the residents of Fire Island to seek and facilitate the formation of FINS in 1964. Over the 50 year history of FINS the leaders and residents of the 15 Hamlets and 2 Villages that represent the exempt communities and residential areas on Fire Island have sought a working partnership and dialogue with FINS and the other Fire Island stakeholders for the purpose of stabilizing, maintaining and preserving the unique environment, character and culture of Fire Island.

We wish to express our support for the provisions of the proposed General Management Plan ("GMP") which acknowledges that. " the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

We clearly reject and do not in any way support the Continuation of Current Management Practices described as Alternative 1 under the proposed GMP.

We give our complete support to Alternative 3 under the proposed GMP, which states and commits to the following plans of action:

- The NPS would commit to Cooperative Stewardship and would work collaboratively with Fire Island communities and other relevant entities to improve land use planning and regulations and to protect the environmental quality and distinctive character of Fire Island
- The NPS would assume a leadership role in working with Fire Island communities, the towns of Islip and Brookhaven, Suffolk County and New York State to develop a coastal land use and shoreline management plan for Fire Island
- The NPS would work collaboratively with others to encourage, support and cooperate with Fire Island communities and the

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towns of Islip and Brookhaven in the identification and preservation of the distinctive character of each Fire Island community and Fire Island as a whole

-That the Seashore experience and interpretation would recognize the relationship between the human involvement with the dynamic natural landscape of the barrier island

-In considering Fire Island's human history, the relationship to the natural environment would be central, as that story of adaptation and manipulation has shaped the place that exists today and will influence how the NPS, Fire Island communities, and other Seashore stakeholders respond to the effects of climate change and sea-level rise

-Cultural resources would be considered island-wide through a comprehensive cultural landscape report that examines the history of Fire Island as a whole and its various stages of use and development with the understanding that the Seashore would collaboratively offer technical assistance to Fire Island communities seeking to inventory, protect and interpret their own cultural resources

-Through collaborating on programs and special events the NPS would create more opportunities to link the Seashore experience between Fire Island communities and the Seashore

-The completion of a Fire Island-wide cultural landscape report, the rehabilitation of a number of historic structures, and efforts to document and develop a management plan for archeological resources that would be of a long term benefit to the Seashore's cultural resources

-Land use and development proposals including technical assistance to Fire Island communities to identify and preserve their distinctive community character; and revision to land use regulations including alternatives to traditional zoning that would be of long term benefit to the overall character of Fire Island.

We most appreciate this opportunity to express our support for the GMP as described above.

Thank you

Alan W. Altman

Nancy J. Altman

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 79

Author Information

Keep Private: No
Name: Anton and Sulene Schubert
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Fair Harbor, NY UNK
USA
E-mail:

Correspondence Text

15 September 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

We are residents of the Village of Fair Harbor, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). We have been homeowners for more than 30 years.

The unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years; however, a new spirit of collaborative stewardship and working partnership has evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 20 years since the National Seashore was established in 1964".

"We clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. We give our complete support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

In particular we support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

Preserving the Island's distinct character: The NPS would work collaboratively I with others to help identify, document and

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preserve the distinctive character of each Fire Island community and Fire Island as a whole.

We most appreciate this opportunity to express our support for the GMP Alternative #3 as described above.

Sincerely,

Anton & Sulene Schubert



Fair Harbor - Fire Island

Islip - New York

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 80

Author Information

Keep Private: No
Name: Audrey Hartmann
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10011
USA
E-mail:

Correspondence Text

Sept 14, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Fire Island National Seashore General Management Plan

I am a resident of the Village of Cherry Grove one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). I have been a homeowner for more than 45 years.

The unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative stewardship and working partnership has evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

"I clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. I give our complete support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

In particular I support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

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I am proud to be one of the "seniors" here at the Grove, who helped plant carefully and lovingly "grass" on our beautiful dunes.

I appreciate this opportunity to express my support for the GMP Alternative #3 as described above.

Sincerely,

Audrey Hartmann


[REDACTED]

New York, NY 10011

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 81

Author Information

Keep Private: No
Name: Erin Crotty
Organization: Audubon New York  Official Rep.
Organization Type: P - Conservation/Preservation
Address: 2 Third Street, Suite 480
Troy, NY 12180
USA
E-mail: jliner@audubon.org

Correspondence Text

K. Christopher Soller
Superintendent
Fire Island National Seashore
120 Laurel Street
Patchogue, NY 11772
Fire_Island_GMP@nps.gov

September 17, 2015

Dear Superintendent Soller,

On behalf of Audubon New York, the New York State office of the National Audubon Society, please accept the following comments on the Fire Island National Seashore Draft General Management Plan/EIS.

1. What ideas or proposals do you like about the preferred alternative for Fire Island and the William Floyd Estate?
 - Fire Island National Seashore is a unique natural resource that provides habitat to notable at-risk species and, as such, warrants a plan that prioritizes those values and balances future use in a way that protects them.
 - We were pleased to see that any future facility additions or renovations to expand recreational opportunities will be evaluated using a set of climate change strategies that mostly encourage a retreat response to rising sea level and other climatic changes rather than rebuilding in places where there will be continued or increased risk (p.40, 86).
 - We support all of the strategies that are proposed for responding to changing climate (p. 41 and 42) as well as the interest in engaging visitors in the conversation about climate change (p.41 and 42).
 - We support NPS continuing to communicate to the general public about the dynamic nature of the barrier island and the potential risks associated with owning and managing property within the coastal environment (p. 73).
 - We support the NPS continued acquisition of lands and easements as opportunities present themselves (p.47, 73). Also, we support additional lands being designated as Wilderness (p.79).
 - We support the continuation of the salt marsh elevation monitoring and marsh landscape change analysis in collaboration with the NPS Northeast Coastal Barrier Monitoring Network, and would be interested in seeing strategies developed to address the recent observation that salt marsh development is not keeping pace with sea level rise (p.56) and encourage the exploration of facilitating marsh migration.
 - We strongly support the NPS efforts to work with others to protect, restore, and emulate the natural processes of Fire Island to the greatest degree possible and the acknowledgment that NPS needs to transition from the current practice of beach nourishment to a more natural (dynamic)

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beach and dune system (p.59).

- We are pleased to see that NPS will consider all alternatives for breach management, including letting natural processes function and not closing breaches even though the FIMP tentative Federally Supported Plan (TFSP) identifies a more limited set of approaches to breach management (p.59).
- We strongly support efforts to study the impacts of the deer populations and if it is determined that the deer population is having a negative impact on the ecosystem, we would like to see management strategies to reduce deer populations implemented (p. 70).
- We support a larger emphasis on scientific research and NPS efforts to collaborate with local partners and academic institutions (p. 69).
- We support new NPS initiatives that call for coastal parks to address marine resource issues in addition to terrestrial (p.71).

2. Do you have any suggestions for improving the preferred alternative for Fire Island and the William Floyd Estate?

- Although we recognize the reasoning behind the preferred alternative's focus on continuing human use while balancing needs of natural resources, especially given the diversity of landowners and land use that fall within the NPS boundary, we strongly encourage that human use does not take precedent over natural resource protection.
- Given the declines in the New York Piping Plover population and the notable amount of potential habitat that falls under the NPS, we recommend updating the Seashore's Threatened and Endangered Species Management Plan and that it include provisions to address the potential effects of climate change and sea level rise on the species, and also evaluates population trends, effectiveness of existing management, and needs for additional management, all in the context of the USFWS Piping Plover Recovery Goals (p. 54).
- We ask that the driving regulations that are in place be assessed to determine if they are adequate for the protection of natural resources, in particular the Piping Plover and other federally listed species during the breeding season and also during migration and winter seasons.
- We ask that the driving regulations be evaluated to see if they are consistent with the wilderness designation (p. 49) and that the wilderness character metrics capture the impacts of ORV use (Wilderness Stewardship Plan, p.9).
- With the shift in focus for public programs to be on the interconnections between nature and humans we request that the former focus on raising awareness of and developing an appreciation for the unique qualities of Fire Island and how future human activity may affect resources still be retained in the public programming messaging.
- We suggest that NPS research the impact of predators (native and non-native) on threatened and endangered species and, if necessary, implement management techniques to reduce the impact of predation (p. 70).
- We respectfully request that feral cats be considered a non-native invasive species and be included in any invasive species plan that is developed and managed as such (e.g., the Non-native Invasive Plant and Animal Species Management Plan) (p. 70) as feral cats are a threat to beach nesting birds and other wildlife.
- We suggest that the NPS communicate the approach of retreat rather than rebuilding and the benefits of that approach as it works with communities, Smith Point County Park, and Robert Moses State Park on post storm planning guidelines in local comprehensive or master plans (p. 73).
- We ask that as you consider allowing horseback riding in the Wilderness Area that you explore the potential for increased spread of invasive species that may be associated with it and propose requirements to mitigate this risk. Also, if horseback riding is to be permitted in the Wilderness Area, we request that it be limited to late fall and winter and confined to designated trails to reduce disturbances to beach nesting and migrating shorebirds (p.79).

We thank you for the opportunity to provide these comments. Should you have any questions regarding the points we have raised, please contact Jillian Liner, Director of Bird Conservation for Audubon New York at jliner@audubon.org or 607-254-
Correspondences - Fire Island General Management Plan - PEPC ID: 16782

2437.

Sincerely,
Erin Crotty
Executive Director and Vice President, Audubon New York

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 82

Author Information

Keep Private: No
Name: Carl and Linda Eisenberg
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Cherry Grove, NY 11782
USA
E-mail:

Correspondence Text

September 14, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore
15 State Street
Boston, MA 02109)

Re: Draft Fire Island National Seashore General Management Plan

We are residents of Cherry Grove, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). We have been homeowners for more than 10 years.

The unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road". Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative stewardship and working partnership has evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

We clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. We give our complete support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

In particular, we support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality, and preserving the distinctive character of our communities.

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island.

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Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document, and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

We most appreciate this opportunity to express our support for the GMP Alternative #3 as described above.

Sincerely,

Carl Eisenberg

Linda Eisenberg

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 83

Author Information

Keep Private: No
Name: Cindy Davis
Organization:
Organization Type: I - Unaffiliated Individual
Address: UNK
Fair Harbor, NY UNK
USA
E-mail: [REDACTED]

Correspondence Text

To: fire_island_GMP@nps.gov

As a home owner in Fair Harbor, I am writing in support of GMP Alternative 3.

I wish to preserve the dunes, to expand the dunes and protect them against the effects of global warming and rising sea levels, and to keep the homes on Fire Island safe.

I am in favor of continued home development on the dunes and expansion of the height and width of the dunes.

At the same time, I feel development of homes can be done without increasing the footprint of the homes. It makes sense to allow the expansion of homes upward, both by raising the homes and by allowing upward expansion of living space. This allowance will not impinge on the nature of the dunes. Homeowners should be encouraged to preserve the dune by use of plantings and by use of walks that prevent blowing sands away from dunes.

A cooperative stewardship that recognizes both the human use of the area along with its delicate eco-structure is most appropriate for this area.

Alternative 3 best meets this goal.

Thank you,

Cindy Davis

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 84

Author Information

Keep Private: No
Name: Dawn Lippert
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Kismet, NY UNK
USA
E-mail:

Correspondence Text

September 16, 2015

Fire Island National Seashore GMP
15 State Street
Boston, MA 02109
Attn: Ellen Carlson

Re: Draft Fire Island National Seashore General Management Plan

I came to Fire Island in 1988 as the wife of a career National Park Service Ranger. At that time we lived year round, with our children, as required occupants renting government housing. The housing unit was located at Sailor's Haven, a park area of Fire Island National Seashore (FINS). In 1997 we purchased a house in Kismet, one of the 17 communities within the boundary of Fire Island National Seashore which predates the formation of FINS. We have chosen to make Fire Island our permanent home. I have been a Teacher Assistant with the Fire Island School District since 1990. The Woodhull Elementary School is located in Corneille Estates which is just west of Ocean Beach on Fire Island.

My husband has since retired. During his employment at Fire Island National Seashore, he was an Assistant District Ranger, a District Ranger and finished out his career as the Chief Ranger. My experiences with regards to the NPS have allowed me to see Fire Island as a wife of an employee, a National Park Service family and as a year round resident. I take pride in the fact that as a NPS family we have always been stewards of various National Park Service areas we have been stationed in. The park service lifestyle requires a love for the environment and a respect for what it means to be a "Park Ranger".

Over our many years here, we have lived under the management, my husband has worked for and we have had to deal with a variety of Superintendents. It has been our experience that the various personalities have set the tone as to how the NPS has interacted with the year round community. The year round community has historically recognized the unique and special character of Fire Island. The formation of Fire Island National Seashore in 1964 grew out of a passionate concern to preserve this unique quality of Fire Island. Stopping the "Moses Road" was the concern of many Fire Islanders, however the consequences to the year round resident, whose home is their primary residence, has resulted in a strained relationship between them and National Park Service. As a result, the relationship has been at times adversarial, with many areas of tension regarding management and driving issues.

However, over the past several years, a new spirit of collaborative stewardship and a working partnership has evolved. The Draft Management Plan for Fire Island incorporates this new policy of cooperation and dialog, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a

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different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

In reviewing the Draft GMP I give my support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use. I appreciated the fact that Alternative #3 of the GMP recognizes that Fire Island is a place where adaptation to and manipulation of the environment has shaped its distinctive character. That fact that the NPS now recognizes the relationship between human use and nature in this document is an encouraging development in the long-term vision in managing Fire Island National Seashore.

The elements that of the NPS Preferred Alternative (#3) that have my support are:

- Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities
- Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan.
- Preserving the island's distinctive character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

Aspects of the Draft GMP that I like:

1. That this GMP recognizes the many groups (year round, seasonal and day visitors) are responsible for stewardship.
2. The new emphasis on marine and ocean based resources.
3. The holistic approach to and the idea of a forum for communication, coordination and collaboration.
4. I appreciate the fact that Alternative #3 of the GMP recognizes that Fire Island is a place where adaptation to and manipulation of the environment has shaped its distinctive character we now see today. As stated before, the fact that the NPS now recognizes the relationship between human use and nature in this document is an encouraging development in the long-term vision in managing Fire Island National Seashore.
5. The reestablishing, if financial resources are available, of an onsite, residential environmental program. There was a program years ago at Sailor's Haven that was excellent.
6. Under Access and Transportation it states that the NPS wants to ensure that transportation routes to NPS facilities on Fire Island and Long Island are well known, well-marked and easy and safe to navigate. I read this as maintaining the vehicle tract "Burma Road" between the Robert Moses and Kismet as a safe, stable and sustainable route to the mainland. This is vital to the year round resident and their ability to maintain a viable primary residence on Fire Island.
7. A driving manual to educate all parties that drive. The utility companies could use this as well as new Year Round permit recipients.
8. I like that the NPS wants to rehabilitate a number of historic structures and as well as expand the curatorial storage facility at the William Floyd Estates, which would have a positive impact on the use and protection of museum collections.


My concerns:

1. Concerned that the impact of increased visitation to the Lighthouse in particular could adversely affect our driving needs due to pedestrian traffic down "Burma Road". I would want an avenue of discussion if that situation should arise.
2. With the desire for an increase of public visitation to NPS sites and communities, will there be any form of economic support or at least recognition of the increased stress to the communities (garbage removal, damage to community property such as tennis courts for example) or increased use of the services (Fire, Rescue, Medical, Lifeguard, etc.) These services are financed by local taxes and or property association dues. There could be an increase of costs incurred due to increased park visitation.
3. Concern for bike access. The idea to be able to laterally transverse the island is commendable. However what would be the impact within the communities? The fact that NPS want to establish an Intercommunity Bicycle Working group does suggest that they are aware of the concerns, and is appreciated.
4. I am curious as to where the "no-anchor zones" would be established. Will it include areas in front of all NPS properties? I appreciated the need to study the environmental impact to these areas. However what would be the consequences and/or impact to public and residential use.

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5. I welcome the fact that FINS would take a leadership role in zoning issues, however I do remain cautious as to how overreaching the government's authority would be. The desire to keep the historically distinctive character of Fire Island communities does concern me. The overbuilding and massive "McMansions" similar to what has transpired in the Hampton Areas of Long Island NY is distressing and compromises the traditional character of homes and image of Fire Island. I appreciate the smaller profile and beach-like quality of the homes and hope it will be the norm rather than the exception. I think that local zoning regulations should still be instituted on privately owned land. The issue is that both towns (Islip and Brookhaven) should be uniform and consistent in their permitting and enforcement. I would ask that the NPS further describe what their "leadership" role would actually be.

I appreciate the opportunity to express my support for the Draft GMP Alternative #3. I also support Management Alternative B in regards to William Floyd Estate.

Sincerely,
Dawn Lippert

Kismet, NY

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 85

Author Information

Keep Private: No
Name: Charlotte Kahn
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Ocean Bay Park, NY UNK
USA
E-mail: [REDACTED]

Correspondence Text

Karen, I did not see an address for our comments and preferences. Perhaps you can include mine in some way.


I have been a homeowner in OBP for 35 years. My family - children and grandchildren - have loved being there. WE not only relish the sea and sand and the quiet relaxation (without cars!), but have found friends and some kindly neighbors in the community. Our community spirit and the thoughtful leadership of the community organization must be preserved. And even while we collaborate on some events and cooperate on many issues, I think the other FI community members of Ocean Beach, Seaview, Kismet - and the others - most likely also cherish their own separate communities.

Charlotte Kahn
[REDACTED]
OBP

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 86

Author Information

Keep Private: No
Name: Dawn Lippert
Organization: Fire Island Year Round Residents Association  Official Rep.
Organization Type: O - Civic Groups
Address: P.O. Box 305
Ocean Beach, NY 11770
USA
E-mail:

Correspondence Text

FIRE ISLAND YEAR ROUND RESIDENTS ASSOCIATION

September 16, 2015

Fire Island National Seashore GMP
15 State Street
Boston, MA 02109
Attn: Ellen Carlson

Re: Draft Fire Island National Seashore General Management Plan

The following comments are submitted on behalf of the Fire Island Year Round Residents Association. Our membership resides within the boundary of Fire Island National Seashore, throughout the 17 communities. The "category" of "year round" residents has historically been a part of the fabric of Fire Island for generations prior to the establishment of Fire Island National Seashore. While there was an acknowledgment of the need to stop the "Moses Road", there was a significant concern regarding the effect of a newly established national park area and all the regulations that such an entity would bring to the Island.

The driving regulations and restrictions are a perfect example. These regulations were established and understood to maintain the quality and character of the beach life environment, however the need to maintain a viable, sustainable year round community was and continues to be important to our organization and it is of paramount importance to the success of the Island as a whole. As year round residents we are the core members of the local fire departments, maintaining each community's fire department, EMS and rescue services. The seasonal residents and off-season visitors to these areas within the communities are dependent on the commitment and dedication of our members. Thus the need for a robust fire, EMS and law enforcement response to emergencies during the winter as well as the shoulder seasons is in most cases entirely dependent on the year round community,

Also within the boundary of Fire Island National Seashore is the Fire Island Union Free School District. This District educates our children who reside within the communities on Fire Island as well as the residents of United States Coast Guard Station located on Fire Island. Our success as a school district is also dependent on the sustainability of the year round resident community. The health and safety of our children as they travel across NPS property is also an important concern of ours.

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Needless to say since the establishment of Fire Island National Seashore the relationship between the NPS and the Year Round community has been strained and at times adversarial. Many of the areas of tension were within the areas of management and driving issues. Historically this was precipitated by how former superintendents interpreted the gray areas of the previous GMP. It appears this new GMP addresses the human use component, which at times was the heart of the tension.

Over the past several years, a new spirit of collaborative stewardship and a working partnership has evolved. It is our hope that the new approach of communication, coordination and collaboration will alleviate the gray areas in the previous GMP. The Draft Management Plan for Fire Island incorporates this new policy of cooperation and dialog, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the SO years since the National Seashore was established in 1964".

In reviewing the Draft GMP our organization will lend our support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use. We appreciate the fact that Alternative #3 of the GMP recognizes that Fire Island is a place where adaptation to and manipulation of the environment has shaped its distinctive character we now see today.

The fact that the NPS now recognizes the relationship between human use and nature in this document is an encouraging development in the long-term vision in managing Fire Island National Seashore.

Cooperative Stewardship. The idea of FINS working collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities has our support. We support the holistic approach to and the idea of a forum for communication, coordination and collaboration of the Island's stewardship. It is appreciated. The Draft GMP is recognizing the many groups (year round, seasonal and day visitors) that are responsible for the care and future of Fire Island. This is a refreshing and much welcomed change in the direction of management of FINS.

Concerns include:

- Under Access and Transportation the GMP states that the NPS wants to ensure that transportation routes to NPS facilities on Fire Island and Long Island are well known, well-marked and easy and safe to navigate. It is our understanding this should be interpreted by future Superintendents to maintain the vehicle tract aka "Burma Road" between the Robert Moses and Kismet as a safe, stable and sustainable route to the mainland. This multi-user trail must be considered as important as boardwalk access as it is the only vehicle route connecting Fire Island to the mainland.
- We are concerned that the impact of increased visitation to the Lighthouse in particular could adversely affect our driving needs due to pedestrian traffic on the "Burma Trail". We would want an avenue of discussion if that situation should arise.

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and a shoreline management plan. We appreciate the collaborative approach of coastal use and shoreline planning.

Concerns include:

- We are curious as to where the "no-anchor zones" would be established in front of NPS areas. We recognize that these areas of the bay need to be studied for environmental impact however what would be the consequences to public and residential use should certain areas adjacent to the communities be closed.
- We appreciate the fact that FINS would take a leadership role in zoning issues, however we remain cautious as to how overreaching the government's authority would be. Local zoning regulations should still be instituted on privately owned land. We ask that the NPS further describe what their "leadership" role would actually be.

Preserving the island's distinctive character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

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Concerns include:

- With the attempt of the NPS in establishing a more open dialog between the communities which Includes the FI year round residents it is our concern/hope that our voice will be heard and appreciated concerning the driving regulations and the effect the regulations have on our ability to live productively on Fire Island. We are a relatively small group compared to the seasonal residents and our concern to be recognized and appreciated as an Integral and necessary community on Fire Island is paramount.
- Albeit it is a commendable idea to be able to laterally transverse the island by bicycle we however would be concerned about the impact within the communities. We do note the fact that the NPS wants to establish an Intercommunity Bicycle Working group and this does suggest that they are aware of the concerns and it is appreciated.
- With the NPS's desire for an increase of public visitation to NPS sites and communities, we are concerned about the increased stress to the communities (garbage removal, damage to community property) or increased use of the services (Fire, Rescue, Medical, lifeguard, etc.) Many of the services identified above are supported by local taxes and or property association dues.

We appreciate the opportunity to express our support for the Draft GMP Alternative #3.

Sincerely,

Dawn Lippert, President

Fire Island Year Round Resident Association

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 87

Author Information

Keep Private: No
Name: Judy Treible
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Takoma Park, MD 20912
USA
E-mail: [REDACTED]

Correspondence Text

Sept. 16, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

I am a resident at the hamlet of Water Island, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). I have been a renter for more than 20 years.

The unique and special character of Fire Island has long been recognized and by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues. Over the last several years, however, a new spirit of collaborative stewardship and working partnership has evolved. The recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

I clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. I give my complete support to Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

In particular I support the following elements of the Preferred Alternative:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

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Restoring native species: I very much support the proposed efforts regarding restoration of native plants and the mitigation of invasive species on Fire Island. I am a Weed Warrior in Montgomery County, MD., and work with the Maryland National Capital Park & Planning Commission to remove non-native invasive plants from MNCPPC property. I am also a beekeeper and active member of the Montgomery County Beekeepers Association. I support any efforts to help pollinators, and especially support ways to help Monarch butterflies and other species that rely on Fire Island and other barrier islands as an essential part of their migratory life cycle.

I most appreciate this opportunity to express my support for the GMP Alternative #3 as described above.

Sincerely,

Judy Treible

[REDACTED]

Takoma Park, MD 20912


[REDACTED]

Water Island, NY

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 88

Author Information

Keep Private: No
Name: Joe Zysman
Organization: Fire Island Wilderness Committee  Official Rep.
Organization Type: P - Conservation/Preservation
Address: PO Box 25183
Brooklyn, NY 11202
USA
E-mail:

Correspondence Text

Comments on the Fire Island National Seashore

Draft General Management Plan
Environmental Impact Statement

submitted September 17, 2015 by the

Fire Island Wilderness Committee
PO Box25183 Brooklyn NY 11202

Introduction/ Summary

Submitted herewith are the comments of the Fire Island Wilderness Committee on the Draft General Management Plan and Environmental Impact Statement (GMP) for the Fire Island National Seashore (FIIS), issued June 2015. Our comments are largely limited to those parts of the GMP that address the Otis Pike Fire Island High Dune Wilderness (OPW), including the Wilderness Stewardship Plan (WSP) in Appendix D. This draft revision the 1983 Wilderness Management Plan (WMP) is particularly welcome, as we had advocated for that to take place since the commencement of the planning process in 2009.

In the 35 years since its establishment in 1980, with some recent exceptions, the character of the OPW has experienced few significant changes, largely because it has been left alone. However in more recent years, being left alone has become neglect of critical elements of that character. To get to the heart of the matter, in recent years the wilderness character of the OPW has been impaired by management failure to counter that neglect with positive action. The reasons for this are not very clear.

The current planning process provided the National Park Service (NPS) and FIIS the opportunity to address this, but that opportunity appears, at best, not to have been taken advantage of. There are many beneficial provisions in the documents, but many others are not at all beneficial and are inconsistent, to varying degrees, with key provisions of the Wilderness Act, which is the benchmark that any proposed action must be measured against, and the National Environmental Policy Act. (NEPA) and much of this commentary will examine those in more detail.

A technical note- page references included here are to the pagination of the hard copy, except for the WSP itself, where they are to the pagination of that document alone. including its sub-appendices. References to the GMP are meant to be to both the GMP and EIS, but not to the WSP, which is referenced separately.

Wilderness Character

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Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such their purposes for which it may have been established as a/so to preserve its wilderness character. (Wilderness Act, §4(3)(b))

In recent years, the National Park Service has adopted guidelines relating to identifying and monitoring" wilderness character," called "Keeping It Wild" developed by an interagency team representing the four federal wilderness managing agencies. There is a great deal of emphasis on these concepts in the documents, and multiple references to it throughout.

Based on the statutory language of the Wilderness Act, the interagency team identified four qualities of wilderness character that should be used in wilderness planning, stewardship, and monitoring in addition to a fifth component related to unique features or qualities:

Untrammeled-Wilderness is essentially unhindered and free from modern human control or manipulation

Natural- Wilderness ecological systems are substantially free from the effects of modern civilization

Undeveloped-Wilderness retains its primeval character and influence, and is essentially without permanent improvement or modern human occupation

Solitude or a primitive and unconfined type of recreation-Wilderness provides outstanding opportunities for solitude or primitive and unconfined recreation (GMP p.268)

A fifth quality was also added, though it is not included consistently in the documents:

Unique qualities of a particular wilderness area are recognized as a fifth component of wilderness character that must also be considered (ibid.)

These four principles were adopted from the definition of wilderness in Chapter 2(c) of the Wilderness Act- the fundamental requirements for an area They are the qualities that all wilderness areas have in common and that they must have to become a unit of the National Wilderness Preservation System.

These are important and central to any monitoring process, however they must be used with a caveat as they also may operate to neglect or effectively omit essential elements of the wilderness character of a particular area. This possibility is tacitly acknowledged in the GMP:

It was designed to apply to every wilderness regardless of administering agency, size, geographic location, type of ecosystem, permitted uses, or any other attribute. (GMP P. 79)

It should be noted that in the quote from the Wilderness Act, above, the article, "the" in "preserving the character" is singular. That would not preclude elements of character involving the monitoring qualities to be included- they would be, but it would also function to include other character elements not covered by them.

Baseline

The WSP's own Appendix D contains a fairly complex for monitoring "wilderness character," - almost as long as the body of the WSP itself, with fairly involved data based procedures for doing so, based on the Keeping it Wild guidelines.

This includes the establishment of a baseline against which to conduct the ongoing monitoring. No date is given for the baseline, but as the procedure is new, at least to the OPW, based on conversations with Seashore staff, the goal is that it will be set once the final WSP is approved.

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This could be misleading as it might serve to legitimize 35 years of history-natural and man-made, in the OPW that have had impacts on its wilderness character, that may not all have been beneficial.

This process is of course useful, however the only legitimate baseline against which to measure wilderness character in the OPW is the date of the passage of the legislation that created it in 1980, supplemented by the large scale map of the area that was finalized in 1983, and which is referenced in the legislation.

Wilderness Character of the OPW: The Burma Road Trail

Several elements found in the OPW have been important in defining its character since its designation, and the east-west known as the Burma Road is the most significant of them. The most troubling provision in this plan is the proposal to abandon regular maintenance of it. Some history:

The Burma Road was originally a sand road for vehicular access for residents and utility companies well before the Seashore was established, including the area east of Watch Hill that became the OPW in 1980, where it extended through the full 7 mile length of the designated area. As such, it was also an ideal path to walk on, and was used by hikers, bird watchers, and other visitors after the Seashore was established. Its existence was a major incentive for local civic and environmental groups to endorse wilderness designation for the area.

The 1983 Wilderness Management Plan, recognized that with vehicular use banned in the OPW, the trail would need to be kept open and that "visitor foot travel will probably maintain an acceptable width." (WMP p. 19). It was clear that one way or another, maintenance of the trail was a necessity. Over the years, and particularly after the appearance of Lyme Disease in the area, the number of visitors using the trail began to decline, and the vegetative growth began to narrow its width, making passage somewhat more difficult, but still acceptable.

Advocacy for Maintenance

By the time of the commencement of the planning process in 2006 this had become a concern of hikers, bird watchers, and other visitors. Over the next few years, we and many groups involved in our coalition asked FIIS management to undertake maintenance of the trail, and to address and include provision for that in the forthcoming WSP. Part of this activity included sending two letters, endorsed by multiple participating groups, to the FIIS Superintendent and to the NPS Regional Director. Copies of those letters are attached with these comments.

These efforts seemed to bear fruit as Seashore management acknowledged the need for commencing active and sustained maintenance, and invited us to hike the trail with them with a view to assessing the route and its maintenance needs in detail.

Following a meeting with the Regional Director, Superintendent Soller made a strong and clear commitment to undertake maintenance, in a letter:

As we have discussed over the past couple of years, the park is committed to maintaining an east/west trail corridor that follows the historic Burma Road alignment ... We are committed to maintaining the east/west corridor in a way that will provide hikers a through route that is easily identified and relatively clear of vegetation. (Supt. Soller to FIWC, Feb 1, 2012 p. 1; attached)

Why this commitment was never fulfilled in any way remains unexplained. The opening of the breach later that year completely cut off access to the OPW from the east, and would have created difficulties in carrying out any maintenance, but would not have precluded it.

At a June 30 meeting, following the release of the WSP, Superintendent Soller claimed the the reason was that the Seashore did not have the funds that would be needed. No doubt that NPS, along with many other Federal agencies, have experienced

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budgets cut, and this has affected every unit in the park system. But budget allocations also reflect priorities, and trail maintenance in the OPW isn't one of them.

But sustained maintenance of the trail would not involve a large expense, because only a portion of it needs significant clearing, and volunteers from several of the hiking groups that we work with and know the trail would likely be available to help. What would be needed from the Seashore, would be supervision and logistical assistance.

Abandoning the Tran

Instead of now committing to the badly needed maintenance of the trail, the WSP now proposes abandoning the idea of any kind of effective maintenance with high sounding language language that distorts any reasonable concept of wilderness character, while at the same time pretending it is beneficial.

Wilderness is primitive and unconfined; the Seashore will promote the values of self-reliance and discovery by not maintaining the full extent of the remnant Burma Trail or pre-existing spur trails. Trailheads adjacent to the wilderness boundary will concentrate visitor use on the Burma Trail into the wilderness if they so choose. (WSP. p19).

This is perverse, because the reality is precisely the opposite. How can a visitor experience these values in the OPW, if he can't get into it to begin with? Access to the trail from the west is completely overgrown 1/2 mile in from the trailhead, and access from the east to most of OPW has been cut off by the breach at Old Inlet.

Trails beginning at trailheads and other points of interest will be permitted to develop only to that of a Class 1 Wilderness, single lane 0"-12" width, as per Federal U.S. Forest Service Trail Class standards. (ibid.)

Limiting trails to this standard- 12" tread and 24" clearing will guarantee that no visitor to OPW will want to walk on them. The 18" tread and 48" clearance of Class 2 would be a minimum standard. Attached with these comments is a page of photographs from a USFS trail guide with examples of the Class 1 standard. One look at them is enough to convince a hiker or bird watcher to head elsewhere for their recreation.

The Burma Trail will be minimally maintained by the Seashore near the eastern and western access of the Wilderness to create a transition between the maintained trails of adjacent lands and the unconfined Wilderness. However access to the Wilderness can take place at any point, not just the Burma Trail (ibid.)

This is fiction. there are no maintained trails on adjacent lands- there are boardwalks on the west, and before the breach, paved roads and walkways on the east. You can't get access to the wilderness at any point- you will have difficulty getting into it at all, except from somewhere along the beach, a limited distance from the beach.

It is one of the few places in the region to offer primitive camping, and limited trail maintenance contributes to opportunities for visitors to explore a wild, natural area with minimal human influences (briars and tangles of dense vegetation, poison ivy, mosquitoes, ticks, marshes, and uneven surfaces will be encountered) for which the user must be prepared. (WSP p. 12)

Dense is the right word, and unless one comes to the OPW equipped with appropriate hiking clothing and a machete, the briars and thorns will shred your clothes and tear your flesh. The set of proposals on these two pages are divorced from reality and a mockery of the idea of preserving wilderness character.

Boardwalks

A key provision in the Wilderness Act is the list of prohibitions in wilderness areas:

. . . . except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act there shall be no temporary road, no use of

motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area. (§ 4 (3)(c))

In respect of this provision, at no time since its establishment have there been any boardwalks in designated wilderness in the OPW. This requires some explanation. When the OPW was designated in 1980 it included a number of structures and installations that could not be immediately removed- residences whose leases would not expire for a few years, some Seashore facilities, and several boardwalks. Because these were few, and occupied very little land, they were placed in an NPS administrative category called "Potential Wilderness Additions" (PWAs).

Some of these were removed fairly soon after designation, others in the early 1990s, and, pursuant to the legislation creating the OPW, a notice was placed in the Federal Register (FR) declaring that these sites 17 acres- were now designated wilderness.

Among these were the 1/2 mile boardwalk from Watch Hill to Long Cove. At the same time, a boardwalk and related structures at Old Inlet, and the accessible boardwalk at Smith Point remained as PWAs, for an unspecified time.

In October 1912 Hurricane Sandy completely destroyed all of these remaining structures and installations, creating the possibility that the sites they were on were eligible to be included in designated wilderness.

The situation with Old Inlet is fairly simple- the structures and installations there were washed away by the breach, and the sites they were on is now part of the breach.

The situation at Smith Point is more complicated and confusing, with inconsistent statements about it in the plans that may have been written at different times.

Two areas within the Fire Island Wilderness had facilities that were deemed incompatible with wilderness designation and were classified as Potential Wilderness Additions. They no longer contain the incompatible facilities and therefore were added to designated wilderness upon notification in the Federal Register by the Secretary of the Interior. (WSP p. 5)

The problem with this statement is that there was and has not been an FR Notice, for good reason. After Sandy, the Seashore received funding to restore several boardwalks that had been damaged by it, and because the Smith Point boardwalk had originally been built as an accessible facility, a decision was made to restore part of it. It did so on the same site it had been on earlier- which had been and which had remained a Potential Wilderness Addition.

B: MRDG and NEPA

In connection with the Smith Point boardwalk, the Seashore completed 2 separate environmental forms- the Minimum Requirement Decision Guide (MRDG)- a 12 page form for NPS to comply with the "minimum requirements for the administration of the area, the provision of the Wilderness Act, quoted above, and a Categorical Exclusion (CE) for compliance with the National Environmental Policy Act (NEPA).

Both of the forms would be appropriate- the MRDG since construction a 1000 foot section of boardwalk requires the use of some vehicles or motorized equipment in the course of building it, and NEPA regulations require a decision on the level of environmental compliance and public notification involved. A CE is the very minimum form, requiring little or no documentation, and without any binding requirement for public involvement.

But notwithstanding the fact that there had not been a FR notice, these forms were used inappropriately in order to justify a different action- the installation of a boardwalk in designated wilderness, for the first time in the OPW.

This appears to be violation of NEPA regulations, and is also add odds with the law establishing the OPW. The construction of boardwalks in the OPW isn't subject to an MRDG based decision as it otherwise might be, because the prohibition of boardwalks, as mentioned above, is contained in a map of the OPW, referenced in the legislation, and which

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clearly identifies the areas that are PWAs. Every boardwalk found in the OPW at that time is illustrated and labeled that map as being inside a PWA ..

Even if that were not the case, many of the statements made in the MRDG in order to justify the action are inaccurate, and NEPA regulations contain a list of a number situations, called Extraordinary Circumstances, in which a CE may not be used. Several of these circumstances have very clear application to the Smith Point Boardwalk. From the NPS NEPA Manual, § 3.5:

- b. have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas
- c. have highly controversial environmental effects ...
- e. establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects;
- i. violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment:

Any one of these circumstances- and most significantly, the last one- would require a higher level of NEPA compliance to have been used, and it is improper for the Seashore not to have done so.

With regard to establishing a precedent, not only is that a possibility, there is a sentence in the MRDG that reveals that to be the underlying intent:

Any decision to reconstruct or create additional boardwalk within the Wilderness Area will be within the framework of a Minimum Requirements Analysis. Minimum Requirement Decision Guide will be the tool utilized to provide the analysis. (FIIS MRDG Worksheet Approved 4/18/2013)

It seems clear that any such action would be in conflict with the legislation establishing the OPW. The final WSP should affirm the intent of the legislation with regard to boardwalks, and unequivocally state that no boardwalks will be constructed in designated wilderness in the OPW.

Camping

Another element of the wilderness character of the OPW proceeds from the requirement in the Wilderness Act to provide opportunities for solitude or primitive recreation. In fulfillment of this, 1984 a Wilderness Camping Policy was developed by the Seashore, which, with few exceptions, worked well and remained unchanged for close to 25 years.

Dispersed individual camping levels (no more than 24 campers per night, with a maximum of 8 per group in the West Zone, and no more than 12 campers per night with a maximum group size of 4 in the East Zone, equating to 36 campers per night total) have been in place since 1984 and have seldom been met or exceeded on a nightly basis, with exception of holiday weekend dates during spring through early fall. (WSP p. 6)

The two zones are on either side of the Bellport Beach tract- the West Zone between it and Long Cove, and the East Zone between it and Old Inlet. These can be seen on the OPW map in Appendix C/ p. 27 of the WSP .

Commencing in 2008, and continuing to the present, Seashore management established camping on the beach in front of the wilderness, which had not been considered before. The regulations mirror most of those for the wilderness per se- the same zones, and the same limits, but a seasonal restriction to permit camping only between March 15 and Labor Day was imposed, to avoid conflict with vehicle traffic on the beach at other times.

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One thing that changed with the introduction of beach camping is the semantics. Wilderness camping in the OPW- as in other NPS wilderness area- was always referred to as being backcountry." But beach camping is also considered backcountry, so "backcountry camping" on Fire Island now means both camping in the OPW and/or camping on the beach in front of it. This has resulted in some inconsistent treatment in the plans, Beach camping is addressed together with wilderness camping in some places separately in others.

NPS public backcountry camping records, which are only available from 2004, reveal a noticeable increase in camping starting in 2008. Almost all of it would seem to be due to camping on the beach, as the monthly breakdown indicates that most of the overnights took place during the summer months.

But since a peak year in 2012, backcountry camping has declined dramatically as access from the east has been cut off by the breach, for both areas. The East Zone is still accessible from the west, but that involves walking 4-5 miles on the beach. while the trailhead for the OPW is totally overgrown a half mile in, just at the entrance point to the West Zone, effectively reducing camping there to a very low level- available to campers who wouldn't mind walking on the soft sand on beach to then try to get to a camping site thru a break in the dunes.

This has now led to a major change in camping policy proposed in the current plans. While the limit on the number of campers remains the same for wilderness- 36- that number has been increased for beach camping- doubling it to 72. This is a result of decreased wilderness camping, allowing the unused wilderness e made available for camping on the beach

The change is now reflected in the title of the draft WSP- it is not just a wilderness plan, but, in large letters on the cover page, a "Draft Wilderness Stewardship Plan and Backcountry Camping Policy"

Nothing better expresses this change than the the camping page on the FIIS website. Under the title "Wilderness Camping, 11 is a photograph of 3 tents on the beach-outside the OPW boundary. A copy of the page is enclosed with these comments.

There's nothing wrong with camping on the beach. Most visitors to Fire Island, certainly during the summer season, go there to get to the beach- so why not let them camp there. But there are some issues about the change. In the 1983 WMP, there was a significant concern- long before anyone was camping on the beach- with human waste. This was because visitors who might walk a mile or two from the Visitor Center restrooms would end up looking for a way to get into the wilderness instead.

Printed instructions given to beach campers requires that tents must be at least 100 yards from each other, but its quite clear from the photo that this is not strictly enforced. The instructions also state that their waste must be carried out with them. It's not clear if this is also intended to apply to human waste- if it was even feasible to be enforced in the first place.

It seems more likely that beach campers will find a way through a cut in the dunes into the wilderness for that purpose This is now a greater concern as as many as 72 people are camping at the same time for one to three nights.

Sufficient area exists to support this level of use without detracting from opportunities for solitude within the Fire Island Wilderness. Despite the greater number of possible permitted campers on any given night, the proposed distribution of campers and limitation on group size between the east and west zones of the Wilderness and the Great South Beach would sustain the quality of solitude and the natural and untrammled character of the Fire Island Wilderness. (GMPp.274)

So another debate about wilderness character is here. Solitude is now defined as only 72 people on a few miles of beach- where visibility on a clear day would enable any one of them to see most or all of the others and/ or their tents. The photograph is much more honest than the text.

Indian Ceremonies

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Discussion of the Indian tribes- the Shinnecock Nation and the Unkechaug Indian Nation appear in several places in the documents. The only link between these 2 Long Island Indian tribes and Fire Island that is mentioned is a link between the Unkechaug Nation and the William Floyd Estate (GMP p. 96; 315). However there are unexplained references to historical connections to the OPW:

Some traditional use occurs by the Shinnecock and Unkechaug tribes. The Seashore will work with native tribes to accommodate traditional uses in wilderness, including collecting and ceremonial activities. (WSP p. 7)

And in the Impacts on Wilderness Section of Chapter 3:

Some traditional use by the federally recognized Shinnecock Indian Nation and the local, state-recognized Unkechaug tribe would continue to occur including collecting and ceremonial activities. (GMP p. 270)

This writer has been involved in multiple way with in Fire Island since the Seashore was established, and has never heard a word mentioned about any connection of the either tribe with the wilderness area, and several histories of Fire Island do not mention any such connection. While the Shinnecock Nation has been the subject of media attention in recent years, none of it is related to Fire Island, let alone the OPW in any way. Neither tribe is mentioned in the 1980 Wilderness Study mandated by the NPS prior to designation, or in the 1983 Wilderness Management Plan.

The absence of any information about any tribal historical uses in the OPW is a flaw. That information should be provided in the final documents.

Horseback Riding

In addition, the Seashore would consider allowing horseback riding by permit in the Fire Island Wilderness. Although such a use has the potential to introduce nonnative invasive species it is not anticipated that horseback riding would noticeably alter the Fire Island Wilderness ecosystem and would, therefore not detract from the natural character of the Fire Island Wilderness and would expand opportunities for unconfined recreation. (GMP p. 270)

It is more than a little ironic that while effectively eliminating recreational opportunities for visitors to the OPW by abandoning trail maintenance of the Burma Road, NPS they are willing to expand them if these visitors can manage to get horse.

A further irony- rather than horseback riding not noticeably altering the ecosystem - it is far more likely that the ecosystem- in particular the areas of heavy overgrowth of vegetation with thorns and brambles- would be altering the horses themselves, if not the riders on them.

It's more than likely that a responsible owner of a horse, on actually seeing the condition of some of the trail or experiencing it once, would want to avoid being accused of animal cruelty resulting from riding a horse into the heavily overgrown sections of the Burma Road.

Other Planning Actions

Several other Seashore planning efforts have been initiated in the recent past, and are ongoing, These involve deer hunting in the Seashore as a whole, and the management of the breach at Old Inlet. Both of these plans and the issues they address involve impacts on the OPW .

. A Draft Deer Management Plan was issued for public comment August 2014, and is now closed; a Final Plan has not yet been issued. While hunting has taken place on on Fire Island for decades, it has been limited to seasonal waterfowl hunting. The WSP mentions the possibility of that being extended to other types of hunting, but it fails to mention that the Preferred Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Alternative in the draft Deer Management Plan includes hunting of deer in the OPW. for the first time- a major change.

A draft Breach Management Plan (BMP) focused solely on the breach at Old Inlet OPW was released only a few weeks ago, and remains open for comment. Breach management in general is discussed in many sections of the GMP and WSP, and the prospective release of the BMP is mentioned as are impacts of the breach on beach camping and on vehicle permits for driving on the beach. But the impacts of the breach on the OPW itself, which are significant, are not mentioned anywhere in the plans.

The current WSP and GMP cannot be expected to address all of the issues involved in other major planning processes, but there seems to be no coordination between the release of these plans and the ones at hand. At the very least, beyond mentioning their existence ,a brief summary of the actual impacts of the breach on the OPW and the proposals of the Preferred Alternative in the Deer Management Plan- which may become final soon, should have been included in the current planning documents.

The absence of even a minuscule level of information about the content of these plans in the GMP and EIS raises a question of whether they are in compliance with NEPA regulations.

Public Involvement

NEPA regulations require agencies to involve the public at various stages in the planning process, and in particular when issuing planning documents, and they also apply to public meeting held in the course of the process.

A number of such meetings were held at varies times. Chapter 5 of the GMP refers to a series of public Workshops held on particular topics, including one on "The Fire Island Wilderness (October 2009)"

From January 2008 to February 2010, the planning team engaged in a number of workshops and briefings oriented toward different components of the plan. Workshops involved representation from Seashore staff, key stakeholders from both the public and private sector, consulting subject matter experts, and other NPS technical specialists. (GMP p. 314)

This was the only public hearing focused solely on the wilderness during the entire planning process, and would be of particular importance the us and our coalition participating groups.

The meeting was scheduled for Tuesday, October 6. The first notice we received of it was received Friday, October 2, in an e-mail sent the day before. The same e-mail was also sent to 10 environmental organizations that were on a Seashore mailing list; some of whose representatives would have wanted to attend.

With such short notice- two business days- it would have been extremely difficult for representatives from most of these groups to attend- if indeed they had received the notice in the first place. Some e-mails were sent to obsolete addresses, and none were ever sent to 10 other groups that had signed on to an earlier coalition mailing, and would also have wanted to attend.

We quickly contacted the planning team in Boston to request that the meeting be rescheduled, in order to make it possible for interested groups to attend, and given the importance such a meeting, we fully expected that to happen. In response, on October 5- the day before the scheduled meeting, we were notified that it would not be re-scheduled.

Copies of the e-mails, sent by George Robinson at the NPS office in Boston, are attached with these comments. Apparently some of the attendees had been notified, as one of the e-mails indicates that an earlier notification had been sent to us and the 10 other groups. But that e-mail it has no date on it, and neither we or any of the other environmental groups ever received it.

The GMP states that these workshops ranged in size from 20 to 42 participants .. A list of attendees we received from the planning team shows that was attended by people- most of them NPS personnel and their presentation contractors and several Correspondences - Fire Island General Management Plan - PEPC ID: 16782

others were from the Village of Bellport. Apart from two of us, only one other environmental group representative was able to attend.

Workshop participants examined many of the issues raised during the public scoping sessions and offered a wide variety of options for consideration. The input from these sessions greatly influenced the development of preliminary alternatives for Fire Island National Seashore. (WSP p. 314)

The main focus of the meeting turned out to be concerns of the Village of Bellport, rather than the OPW per se. In the absence of virtually all of the environmental groups involved with the OPW, it could hardly be claimed that the input from this meeting had much of an influence on the planning process for the OPW in any meaningful way.

This October workshop hardly appears to have complied with even the minimal NEPA requirements for public participation, but that's not the only time a something similar relating to NEPA occurred:

Public comment is not required when using a CE. However, you may wish to seek public comment in situations where there is a high degree of public interest or uncertainty regarding potential effects of a proposed action. (NPS NEPA Manual, §3. 1)

In spite of the long standing public interest in the Smith Point Boardwalk, neither we or, to our knowledge, any other environmental organization associated with us was notified about the CE. We learned of it, accidentally, over a year after it was issued.

Public input can help identify environmental issues and provide information that will help determine whether any extraordinary circumstances exist. (ibid.)

As indicated above in the comments on boardwalks, these circumstances were manifest- and either an EA or an EIS was the required compliance document. By the inappropriate use of a CE, the planning team managed to avoid having to notify anyone- and avoid any public involvement in their planning.

Is hard to avoid the impression that FIIS management would prefer not have any public participation that has the potential to interfere in with planning decisions already made or that might be made in the future ..

The Planning Process and Release of the Plans

The WSP itself is a dedicated stand-alone plan in Appendix D the coverage of the wilderness area in the GMP/EIS is scattered on multiple pages in different sections, and not easy to navigate. A detailed explanation for the process appears in the GMP, which attempts to explain it. but instead only serves to reveal why the outcome is confusing.

The NPS is preparing a new Wilderness Stewardship Plan for the Fire Island Wilderness, which is broadly addressed in this draft GMPIEIS as outlined below. Early in the planning process, the national office of the NPS Wilderness Stewardship Program requested that wilderness planning be integrated with Seashore's GMPI EIS planning process to ensure that it was given full consideration as other proposals within the plan were developed and evaluated for environmental compliance. (GMP, p. 78).

It's difficult to see why "integration" would have ensured full consideration in the first place; and the reality is that, as suggested in some of the issues discussed above, it has not done so. On the contrary, the result would be better described as incomplete and inadequate. Reading further:

A more detailed draft Wilderness Stewardship Plan that, when approved and adopted, would supersede the 1983 Wilderness Management Plan, appears in Appendix D of this document. Typically, the Wilderness Stewardship Plan is prepared as an implementation plan after the completion of an approved GMP.

However, because the proposed actions related to the Fire Island Wilderness are considered to be Common to All Action Alternatives, it was deemed appropriate to prepare and release these documents concurrently. (ibid.)

This is a non sequitur. It hardly follows logically that if the proposed wilderness actions are "common to all alternatives:* it is appropriate to release them concurrently. In the first place, they were not prepared concurrently. The date on the WSP is July 2014, while the GMP was released almost a year later.

More importantly, how can any actions in the WSP be "considered common to all alternatives", as presented in the Alternatives section in the GMP, when there are no alternative actions for wilderness in the first place. What does follow is that if the proposed actions are common to all alternatives, logically there are no alternatives.

A related aspect of the problems with this timing appears in Chapter 5:

As part of the current GMP planning process, proposals for the Fire Island Wilderness are described In the Common to Action Alternatives section of Chapter Two and evaluated In Chapter Four. The Wilderness Management Plan, now referred to as a Wilderness Stewardship Plan (WSP), was updated to be consistent with the proposals In the GMP. (GMP p. 315)

How could the WSP possibly have been made consistent with the proposals in the GMP, if, as noted above, the GMP was completed a year later? Not surprisingly, as a result, there are many inconsistencies in the treatment of the same subjects in the two documents. Looking at more confusion:

- In Chapter 2, Alternatives, and Their Common Elements, in a Section called "Elements Common to all Action Alternatives" , wilderness (the Otis Pike Fire Island High Dune Wilderness (OPW) appears as one of 11 categories along with others like Natural I Resource Management, Seashore Experience, Land Use & Development, Transportation, Operations and Maintenance, and several others.
- In Chapter 3, Affected Environment, the OPW is again included as a category, this time among 7 others. Some of these are the same as the ones in Chapter 2, others are different. At the same time, wilderness is also discussed on multiple pages in all but one of the other categories. •
- In Chapter 4, Environmental Consequences , wilderness is again taken up as a separate category, among others, some of which are the same as in the previous two chapters , others that are different from each of them. But to make it even more complicated, within the 6 page "Wilderness" category, impacts are broken down, first, within sections devoted each of the 4 alternatives, and within each of those, into smaller subsections whose titles- Land Use & Development, and 4 or 5 others, mirror the titles of the larger sections Chapters 2 and 3.
- If this isn't sufficient complexity, back in Chapter 2, the OPW appears under still another classification- Management Areas. (GMP p. 52-3) It certainly seems much more appropriate to treat the OPW as a specific geographic area than as a category and this is the way most of the same land area was treated in the 1976 GMP- when it was called the High Dune Management Area- before most of it was designated as the OPW But if you were looking at the GMP's Table of Contents for where wilderness is treated you wouldn't know that it is also a Management Area- it isn't listed there.

While the Chapters themselves may be required by NEPA, the multiple categories and sub-categories are arbitrary and are used inconsistently. None these categories were created by legislation, as was the OPW, let alone subject to the provisions of a major environmental law like the Wilderness Act. In none of these places is the OPW given the attention that should be accorded a unit, however small, of the National Wilderness Preservation System.

All of this complexity and disjointed treatment of wilderness between the WSP and the GMP and within the GMP itself could easily have been avoided if the WSP been released when it was completed, a over a year ago, accompanied a dedicated EIS. That should now take place in the final plan.

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Conclusion

It is appropriate that the Fire Island Wilderness Areal OPW is situated in the same part of the world where the concept of wilderness preservation was first conceived, and from where it served as a model, 50 years ago first for the National Wilderness Preservation System in America, and subsequently for the rest of the world.

But fifty years after the passage of the Act wilderness today is a threatened species in America, whether from malice, ignorance, indifference, or perhaps the most threatened from acceptance of ever increasing levels of degradation of wilderness character as normal. Paraphrasing Daniel Patrick Monihan's concept, as a nation we have been defining degradation down in our wilderness preserves

NPS Management Policies state that "through its planning processes, the Park Service will determine the desired future conditions for each park planning for the Fire Island Wilderness Area, the most appropriate realization of the desired future conditions should be that twenty years from now. and beyond the area will have retained the same primitive character, especially its unique opportunities for solitude and for unconfined recreation that it exhibits today. Otherwise, we will have transmitted to future generations a modern affliction that Howie Wolke, a wilderness advocate has described as "landscape amnesia"- - the inability of our children or grandchildren to know, identify, or recreate real wilderness because they will never have actually seen it, because it will have ceased to exist.

Landscape Amnesia is an insidious threat both to Wilderness Areas on the ground and to the Wilderness Idea. . . . As future generations experience "Wilderness as a compromised imitation of the real thing, the essence of the Wilderness Idea will die. As ideas die, so do actions based upon those ideas. And without action by those who care, there can be no wilderness in the modern world. We have, after all, entered the century in which the only remaining wild landscapes will be those that we choose to protect. Part of that choice is how well we 'II protect the chosen lands ..

Protect the Otis Pike Fire Island High Dune Wilderness
Change the plan Restore the Burma Road trail

Attachments

- A. FIWC letter to FIIS Superintendent Soller, Jul 10, 2010
- B .. FIW C letter to NPS Regional Director Dennis Reidenbach, November 2, 1011
- C. Letter from Superintendent Soller to FIWC, February 1, 2012
- D. US Forest Service "Trail Fundamentals and Trail Management Objectives, Trail Class 1 Photo Examples, P. 35,
- E. e-mails from George Robinson, NPS Boston, October 1 and October 5, 2009.
- F. FIIS Website, Wilderness Camping page.

CC:

Hon. Charles Schumer
Hon. Kirsten Gillebrand
Hon. Lee Zeldin
NPS District Director Michael Caldwell

18

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 89

Author Information

Keep Private: No
Name: John Lund
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Davis Park, NY UNK
USA
E-mail:

Correspondence Text

GMP Comments Sept 2015

Fire Island had been inhabited and used by humans for centuries before September 11, 1964 and the creation of Fire Island National Seashore. Fishing, boating, and harvesting the bounties of Fire Island were lifelong occupations for the inhabitants of the south shore of Long Island. As this country moved from an agricultural society to an industrial society Fire Island became a vacation spot at the end of weeks work. As FINS was created, plans for future communities on the Island were halted and certain areas with informal small communities were given buy out options. FINS added a level of security for defined communities, unleashed new levels of supervision, nontraditional and unfamiliar rules, regulations, and practices that infuriated many residents and visitors. The visitor numbers to Fire Island indicate that 25% of the visitation is to Seashore areas, which leaves 75% coming to the communities that existed, thrived, and drew people to Fire Island before FINS. I still believe the overwhelming majority of people coming to Fire Island come to it knowing something about one of the communities as opposed to checking it off on a list of National Parks. The Seashore was invited to Fire Island by those communities to stop one of the most powerful men of the 20th century in the state of New York, Robert Moses and his plan which would have eliminated many homes and some entire communities.

Public Law 88-587 Creating FINS included the Fire Island National Advisory Commission which was to consult with the Secretary from time to time on matters relating to the development of Fire Island and carrying out the provisions of the Act. Unfortunately it was a 10 year Commission and ended in the 1970s. I believe the lack of communication, advising, commenting, planning for the future, etc., caused resentment and distrust that exists to today. The "commitment to cooperative stewardship" of Fire Island in Management Alternative 3 has the ability to undo some of the mistakes made in the first 50 years.

Fire Island had been working together with FINS since 1999 on driving regulations and for the first time since the defunct Commission had representatives from communities as well as businesses in the same room discussing the driving issues on Fire Island. We seem to be close to a final version that will be incorporated into the new GMP. The regulation review process seems to be the beginning of the decade and a half long cooperative discussion, and decision making process we will need to accomplish and "recognizing the relationship between human use and nature" in the preferred alternative 3.

At sometime in the early 2000s there must have been a meeting where the resentment and distrust of the current Superintendent was the key item on the agenda, and decisions were made to change things at Fire Island. Dave Spirtes was a breath of fresh air in early 2003 and his untimely passing in April of 2004 was a loss to all on Fire Island who saw his vision for the place and began working with him. Mike Reynolds followed in Dec of 2004 and looked to continue the work begun by Dave Spirtes regarding the breakdown of political barriers, improving communication between all stakeholders, and discussing the concerns of all parties. There were a number of community leaders lucky enough to go to

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exploratory meetings with Mike and hear his ideas for Fire Island based on his successes in other National Parks. I'm happy I was included to participate in the new thinking.

Government is slow and the agencies of government are usually resistant to change. Mike got us thinking, wishing and acting to make Fire Island a better place. One of his goals coming in was to rewrite the 1977 GMP and collectively FINS with community leaders discussed this process. There were the storms of 2004 and 2007 with community renourishment FEMA projects that slowed many things down as we tried to protect and rebuild dunes in communities. Together we created EAs to acquire Special Permits to build beaches, and the communities worked with Islip and Brookhaven to fund them via our Erosion Districts. It was a time when most communities began to work with political entities above their hamlet designation to accomplish goals set by residents. We all gained a better understanding of what FINS does, would allow and what they would support. The FIA saw more meetings with FINS people locally and from Boston and regional offices to accomplish goals. Changes, updates and rewrites to the GMP were talked about and the process began to move forward.


Mike Reynolds was promoted to the regional office in 2008 and Chris Soller became the new superintendent. Chris was there as the largest dune-beach community project was begun and finished in the spring of 2009. Communities, Towns, County, State, and Federal entities worked together to complete that project. The Storm in Nov 2009 destroyed much of the beach and dune built. We became bogged down in the Special Permit wording regarding rebuilding the damaged beach and EAs and EISs. The additional damage during hurricane Irene added more discussion and debate regarding beach nourishment and slowed down progress on the GMP.

Sandy saw the dunes, structures on dunes and inland damaged or destroyed in both communities and the Park areas. We came together as partners to oversee, and to teach the Army Corps, County and Towns more about Fire Island during the cleanup. We are all currently involved in moving the FIMI project forward with its different components in various communities. We need to stay focused on the timely completion of the FIMI Plan to ensure we have the Island protected before the next storm arrives. Chris Soller, despite the natural and political storms, has pushed the GMP as well as the FIMI -FIMP process forward in an effort to make Fire island a better place with all stakeholders being accountable for its future. Well done.

Management Alternative 3 embraces change, improvement based on past experiences, good or bad, and seems to be the best alternative to involve more people in Park- Community interaction, cooperation and "conserving and preserving Fire Island for the use of future generations".

As we move from a draft to a final General Management Plan update, I hope we can all continue to discuss, modify, and introduce ideas and issues that will truly make this a management plan for Fire Island and all stakeholders.

John Lund

 Davis Park Fire Island
Sayville, NY 11782

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 90

Author Information

Keep Private: No
Name: Meg Switzgable & Thomas Brown
Organization: JUST:US Coalition to Serve and Preserve Fire Island
Organization Type: P - Conservation/Preservation
Address: UNK
UNK, NY UNK
USA
E-mail:

Correspondence Text

JUST:US
a coalition to serve and preserve Fire Island Seashore

17 September 2015

Mr. Jonathan Jarvis via <jon_jarvis@nps.gov>
Director, National Park Service
1849 C Street NW
Washington, DC 20240

Re: Comments & Suggestions on Draft Fire Island General Management Plan (GMP)

Dear Mr. Jarvis:

Overdevelopment continues to be the biggest threat to Fire Island. The proposed General Management Plan New Alternatives can make a bad situation worse. We urge rejection of NPS proposed retreat from its responsibilities to restrict overdevelopment on Fire Island and, until a stronger plan is submitted, support the effective administration of the existing GMP.

In this taxpayer-funded 500-page document, NPS seems to be deflecting any responsibility it has for the continuing overdevelopment inside the national park onto others including Congress, the State and the Towns.

In the proposed GMP New Alternatives, NPS proposes giving increased power to the very forces it claims are responsible for the islands environmental degradation, stating this will somehow ensure that the vision Congress had in 1964 is achieved.

Any plan is just words unless it is effectively carried out. In the document, NPS labels its current GMP the No Action Alternative. No action accurately describes the way NPS administers important parts of its current GMP. The current GMP does not prohibit most of the actions NPS now presents in the New Alternatives. What the current GMP prohibits is NPS proposed retreat from its responsibilities to protect Fire Island from overdevelopment.

Expensive long-term government studies confirm Fire Island and its surrounding waters are deteriorating due to overdevelopment. To address this, NPS advocates retreat into undeveloped areas already under its exclusive control, somehow not recognizing that these areas are directly threatened by the forces it proposes to retreat from.

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After its retreat, NPS claims it will then take a leadership role in addressing overdevelopment by collaborating (euphemistically called Cooperative Stewardship, multi-lateral collaborative efforts and partnership opportunities) with the same local officials who NPS claims are not enforcing the regulations. In its next act of leadership NPS proposes to shepherd further relaxation of the federal regulations. One might ask, who devised this logic?

The draft GMP proposals were written under the supervision of the current Superintendent, Chris Soller who, according to page 42790 of the August 29, 1991 Federal Register, was also the primary author of the previous reductions to the Fire Island federal regulations¹. Removed then from federal regulation was (1) the number of bathrooms allowed, (2) in-ground swimming pools and (3) set backs from property lines.

In adopting reduced regulation, NPS ignored strenuous objections submitted by leading environmental groups as well as the New York Department of State, which commented that instead of lessening NPS should be developing more restrictive regulations, setting standards that result in the reduction of development on the island.

Twenty-five years later, results from these deregulations are dramatic and tragic. Every spring Great South Bay turns blackish after summer residents arrive. A 2014 report from Suffolk County alarmingly states, Nowhere have we seen the impact of nitrogen pollution in more stark terms than Great South Bay. Over the past quarter-century, the clam harvest in Great South Bay has fallen by 93 percent, destroying an entire industry which accounted for 6,000 jobs. ²

Twenty-five years of flushing by houses with as many as 8 bathrooms³ (see attached photo) and the seasonal mass emptying of chlorinated swimming pools has significantly added to the environmental deterioration of Fire Island and its surrounding waters. Local zoning authorities are now granting setback variances willy-nilly⁴.

After becoming Superintendent in 2008, Mr. Soller made little effort to address the overdevelopment his 91 changes enabled. In 2014 he approved a Brookhaven zoning code revision that, counter to the intent and purpose of the federal regulations to protect Fire Island, allows expansion and legalization in perpetuity of illegally built houses forward of the dune line, without even applying to the Board of Zoning Appeals for variances⁵.

In the New Alternatives, NPS is now proposing even more relaxed federal standards for the next 20-30 years.

Those of us who are residents of the communities agreed to honor the regulations in order to keep our private property inside the national park. But this sweet bargain is being abused by some property owners who excessively seek and obtain variances. The draft GMPs Executive Summary points out that local zoning boards establish precedence with each variance granted, and NPS well-knows that these precedent-setting variances are killing Fire Island via a thousand cuts.

Counter to its persistent claims, NPS has always had significant powers besides condemnation to keep the politically appointed local zoning boards from incrementally destroying the island one variance precedent at a time⁶.

When asked, the state courts, have confirmed the supremacy of the federal regulations protecting Fire Island and instructed the Towns and residents of the communities to observe existing regulations (*Switzgale v Brookhaven* 2010⁷). NPS has squandered this gift through lack of basic follow up⁸. NPS has never filed an Article 78 to contest a granted variance though the current GMP does not prohibit it from doing so.

Congress appointed NPS to be the voice of the voiceless. The communities are very well represented and funded, and do not warrant or need additional powers ceded them by NPS. NPS has not used its bully pulpit to educate the community residents nor the local officials of the environmental necessity and economic advantages of building within the regulations.

Overdevelopment enabled by the failure of NPS to fully utilize its current powers and influence makes it even more doubtful that further weakened federal regulations can more effectively counter the pressures by moneyed real estate interests on local politicians funding their re-election campaigns.

NPS acknowledges that it is required to include Global Climate change and the resulting rise of the Atlantic Ocean into its proposed plans. Curiously, the new GMP alternatives do not explain how lessening of federal zoning regulations will prepare for increasing ocean levels much less achieve the goals Congress set forth when creating this national park in 1964. It is illogical to expect further lessening of federal standards will deter overbuilding, which is rampant.

NPS professed impotence is a self-fulfilling prophecy. 9 Instead of spending years composing 500-pages that few will ever read, why not show up at zoning board meetings or create a short pamphlet extolling the benefits and responsibilities of property ownership inside a national park?

Why is educational outreach to the communities not ongoing? NPS would have a relatively easy time rallying support if they just exercised the will to educate the residents of the privileges and responsibility of private property ownership inside a national treasure. The park was formed in 1964 with aid from concerned members of the communities to protect the island from further overdevelopment. NPS has never officially asked the communities for their help in controlling overdevelopment.

A low cost NPS pamphlet could be given out by realtors when properties change hands since it is mostly new owners who, not understanding why development restrictions are necessary and desirable, try to build ever bigger castles on the sand.

Yet in its New Alternatives, NPS aims its educational activities at the 400,000 plus visitors to its wilderness areas rather than focusing on the 2-3 million people in the communities, who through their lack of understanding of what is at stake, directly threaten Fire Islands (as well as their own real estate investments) future.

Until Congress issues funds for condemnation, we suggest NPS could be taking simple incremental preventative actions. Since NPS is writing exemption from condemnation letters, is there a searchable list of properties that have lost their exemption? No property owner (or a title company) would want to be on that list, and the current GPM does not prohibit publishing such a list.

The Superintendent recently stated to the press that for the last 50 years NPS has operated on the assumption that the communities would ultimately fail. 10 This was never Congress intent nor its expectation according to the record. Did NPS somehow just realize that the communities are here to stay? Did NPS think they were going away when they removed the federal regulations for in-ground swimming pools, number of bathrooms and property setbacks in the early 90s?

Even the picture on the cover of this plan is misleading with its serene waves of beach grass in front of a community that did not build pools and decks into its dune line. If overdevelopment is a problem that really concerns NPS, why not include a picture of the wealthier community in which, until recently, the Superintendent owned property, where wall-to-wall pools and decks forward of the dune line armor the beach?

We hope this letter will spur NPS to action. We believe it unwise and unrealistic to further relax federal regulations and somehow expect the local governments to step up with the necessary protections. Neither civil nor gay rights would have happened had the federal government taken such a course.

We therefore urge rejection of the retreat and lessening of the federal regulations proposed in the New Alternatives, and instead advocate for effective administration of the current General Management Plan, at least until a better alternative is proposed.

And lets just hope that by the time action is finally taken, it will not be too late because, as environmentalists remind us, once its gone, its gone forever.

Yours truly,

The JUST:US Coalition to Serve and Preserve Fire Island:

Correspondences - Fire Island General Management Plan - PEPC ID: 16782

Meg Switzgable & Thomas Brown
Fire Island Pines, 718.802.0200

Brenden J. McCurdy, Chairman
Peconic Baykeeper <http://www.peconicbaykeeper.org>

Robert F. Kennedy Jr., Vice Chair
Riverkeeper, Inc. <http://www.riverkeeper.org>

Maria Brown, Conservation Chair
Great South Bay Audubon Society <http://www.gsbas.org>

Robert de Zafra, Professor Emeritis <robert.dezafra@stonybrook.edu>
Stony Brook School of Marine and Atmospheric Sciences

Marilyn England, President
The Open Space Council

Marcus Edward, Co-chair
Pines Preservation Committee

Alexander Peters, President
Amagansett Springs Aquifer Protection <http://www.groundwaterprotection.org>

Don Seubert, Vice-President
Medford Tax Payers and Civic Assn.

Noel Feustel, Co-chair
Saltaire Preservation

Cc

Barrack Obama, President of the United States
Sally Jewel, Secretary of the Interior
Michael Collins, Deputy Secretary of the Interior
Michael Caldwell, NPS Regional Director
Karl Christopher Soller, Superintendent Fire Island National Seashore
Charles Schumer, United States Senator New York
Kirsten Gillibrand, United States Senator New York
Peter King, United States House of Representatives New York
Lee Zeldin, United States House of Representatives New York
Andrew Cuomo, Governor of New York
Natural Resources Defense Counsel, Margaret Brown, esq., Mark Iseman, esq.
Land Use Law Departments, Columbia, NYU, Pace & Touro

Attachment: Aerial photo of discolored Great South Bay &
8 bathroom Fire Island Pines house

Endnotes:

1 [https://books.google.com/books?id=BU5VjTzA2_AC&pg=RA1-PA42790&lpg=RA1-PA42790&dq=chris soller federal register 1991&source=bl&ots=jt9LNkoYw9&sig=AdmC-](https://books.google.com/books?id=BU5VjTzA2_AC&pg=RA1-PA42790&lpg=RA1-PA42790&dq=chris+soller+federal+register+1991&source=bl&ots=jt9LNkoYw9&sig=AdmC-)

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-v=onepage&q=chris soller

2 http://suffolkcountyny.gov/Portals/0/countyexecutive/PDF/Executive_Summary-CP_1-31-14.pdf

3 In most Fire Island communities, sewage treatment is a hole in the sand. Each year, as the season progresses, more nitrogen floods into the dying Great South Bay, which no longer supports the abundant seafood of our childhoods. Elimination of federal set back regulations resulted in wood buildings constructed with less than a foot from neighbors.

From 1991 onward, NPS was restricted in its objections to excess lot occupancy, excess height or enlargement of a non-conforming structure.

4 When two large commercial structures burned in 2011, NPS did not object to their rebuilding to 98% lot occupancy without adequate sewage treatment.

5 With the stroke of a Building Department pen, a Certificate of Zoning Compliance (CZC) or Certificate of Existing Zoning (CEZ) is issued avoiding the need for a lot occupancy variance.

6 During the past 7 years NPS showed up only once at a 2011 BZA meeting to speak in opposition to proposed variances. The Brookhaven BZA chairman remarked he was not used to seeing NPS appear to object and the board then rightfully denied the requested variances. The New York State Supreme Court subsequently upheld those denials. Yet NPS has not appeared at a single BZA hearing since, choosing instead to send letters of objection that are routinely ignored and increasingly ridiculed.

7<http://www.courts.state.ny.us/courts/ad2/calendar/webcal/decisions/2010/D28914.pdf>

8 The 2011 *Switzgale v Brookhaven* New York State Appellate Decision wiped the Fire Island zoning precedent slate clean. The local zoning boards were no longer forced to honor past precedent. However, NPS quickly squandered that clean slate due to lack of basic follow up. When NPS did not send a representative to meetings, the precedent for ignoring NPS letters of objection rapidly returned. After seven years, the Brookhaven BZA Chairman still does not know the Superintendents name.

9 NPS Regional Director Caldwell's May 16, 2013 response letter to the Natural Resource Defense Counsel (NRDC) letter to NPS Director Jarvis promised that the Fire Island National Seashore Superintendent would be evaluating all changes to Brookhaven zoning codes since approved by the Secretary of the Interior in 1985. This analysis has still not been done, an example of soothing words followed by no action.

10 Newsday June 13, 2015 Draft Plan for Fire Island National Seashore Emphasizes Collaboration.

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 91

Author Information

Keep Private: No
Name: Karen Blumer
Organization: Open Space Council
Organization Type: I - Unaffiliated Individual
Address: P.O. Box 275
Brookhaven, NY 11719
USA
E-mail:

Correspondence Text

September 17, 2015

Jonathan Jarvis
Director, National Park Service
1849 C Street NW
Washington, DC 20240
E-mailed in c/o ellen_carlson@nps.gov

re: Draft Fire Island General Management Plan/EIS 2015

Dear Director Jarvis:

On behalf of the Board of Directors and members of Open Space Council (OSC), an environmental advocacy, 501(c)(3) organization with a significant constituency included along the southern coast of the Town of Brookhaven, I submit our comments regarding the 2015 draft Management Plan.

OSC also administers the Carmans River Watershed Trust Fund, whose projects and activities focus on the River that empties into the Great South Bay, directly across from the Wilderness Area.

GENERAL COMMENT:

The overriding mandate of the NPS is to preserve and protect the barrier island and its natural resources. Therefore, we strongly endorse the various measures offered in Alternatives 1 and 2 which are directed to "minimizing impact." While we support the new effort of the agency for a "Partnership" with the diversity of stakeholders in all three Alternatives, we highly question and dissuade the direction toward greater development as Alternative 3 suggests.

OVERDEVELOPMENT & PRESENTING STATISTICS

There are many areas we have an interest in which are overseen by the NPS on Fire Island. We are restricting our comments at this time to a select few. Overriding is the density of development and the method of development (for example the use of open-system flush toilets, addressed below in WWT) which already exists and appears to be increasing rather than decreasing.

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FEDERAL/NPS LAND-USE POWERS AND AUTHORITY STRENGTHENED/NOT WEAKENED

To that end, OSC asks that the NPS exercise its powers and federal authority over local laws and zoning to protect and preserve the dynamic of Fire Island and its natural resources. In instances where fiscal resources are short, we encourage the NPS to reach out to local civics and communities to assist them in these efforts.

EXERCISING NPS/FEDERAL LAND-USE CONTROL

Regarding overdevelopment and type of development, there appears to be an intent, especially in Alternative 3, to relinquish power to local jurisdictions rather than enforce the powers already existing with the NPS. We oppose this direction and ask that the NPS keep its stated intent generally regarding the Island as one to "minimize" impacts rather than increase them by allowing local rule to maximize impacts.

STATISTICS

Since the writing of this draft Master Plan for Fire Island took eight years, we were hoping to find some aggregate measures and data regarding any negatively-impacting development and/or positive restoration occurring in the past decades since the last Plan. How many buildings, variances, pools, intrusion into the dunes have occurred over the decades since the first Plan was issued? How many cesspools exist flushing directly into the bay or ocean? In the Wilderness Area, how much of the native vegetation returned where structures or invasive plants were removed?

Please offer some of these relevant statistics in the Final Plan. A plan cannot possibly be carried out absent baseline data.

WASTEWATER TREATMENT ON THE ISLAND

OSC deeply urges the NPS to abandon the use of cesspools and conventional septic systems as currently approved by the Suffolk County Department of Health Services throughout the Island. We encourage the NPS to require the use of closed, waterless treatment systems, such as the Clivus Multrum, which has no effluent, or ATUs (Advanced Treatment Units) which can reach an effluent of 2 ppm or less. Members of OSC Board sit on LICAP, the Long Island Commission of Aquifer Protection's Waste Water Subcommittee and are ready and willing to offer assistance to the NPS in implementing these alternatives to the current egregiously polluting sanitary systems which in no way, belong on a barrier island.

WILDERNESS AREA

OSC has a major interest in the Wilderness Area. It was the statement of one of its Board members at the 1975 NPS Master Plan hearing in Manhattan that inspired a movement which resulted in the creation of the Fire Island Wilderness Area, the smallest and most unique wilderness in the United States.

We applaud and endorse the NPS approach in adhering to the spirit of wilderness in guaranteeing "minimal impact" and maximum ability for the dynamic of the Wilderness Area to self-heal, so to speak, and flow with natural processes.

However we clarify a major point:

WILDERNESS TRAIL ALONG THE BURMA FOOTPRINT

The NPS states that "trails through the Wilderness are minimally maintained." The intent of this stewardship approach is unclear. The last time we visited the Wilderness Area, approaching from the west, the trail

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shortly beyond the entry point was impenetrable without pruners or a machete.

One of the four qualities mandated for wilderness, states clearly that an "opportunity for solitude" and the wilderness experience must be provided. Although access to the wilderness may be derived at other points than the former Burma Road, it is not the same experience as walking the Burma trail snaking through the area between the primary and secondary dunes and the Bay.

To that point, one of our Board members lived in what is now the Wilderness Area by herself in 1975 and two others were itinerant hikers there. Access to the wild area was possible during treks walking to the mainland or west to Watch Hill along the Ocean, or via kayak along the Bay.

However the path that provided the greatest wilderness experience, intertwined with the wildlife and mosaics of vegetation, was the Burma Road. We were often accompanied by herds of deer, fox as a daily appearance, harriers whiskering the landscape, black racers and Fowlers toad. One could travel to the huts of other wilderness denizens for eeling or observing mink slides on a muddy bank. The Burma Road may, or may not have been, used by native Americans, possibly early whalers, more recently those traveling in the wilderness. In short, it offers significant access to the area we fought to preserve, the wilderness, and the benefit of the experience it provides.

Therefore, OSC strongly supports the maintenance of the central trail offering access that is far less deleterious than entering over-the-dunes or bushwacking over the marshes from water access. Reasons given by the Superintendent at a late June meeting for providing minimal-to-no maintenance was staff time, cost, and problems with volunteer help. It seems that these deterrents can be overcome quite readily with the commitment by the NPS to create a "Fire Island Management Partnership." (p. 77 and throughout). We understand that an effort has been made most recently by the NPS to reach out to local volunteer help. OSC strongly supports that direction.

MANAGEMENT PARTNERSHIP - WILDERNESS ENTITY

OSC endorses and supports the NPS in its stated effort to create a partnership with various stakeholders and other entities that would work with the NPS in arriving at management decisions. This body would have power to hold hearings, create funding, and help implement the Plan, among other powers (p.77)

To that end, OSC is suggesting, and requesting, that a Wilderness Task Force or body of other name be created to serve in a similar fashion, representing the Wilderness Area, given that its needs and challenges are so different than all other areas, such as the communities of Fire Island. This could be done either as a stand-alone entity or with representation on the FI Management Partnership were it to be formed.

RESTORATION OF TERRESTRIAL HABITATS

We applaud the efforts in the past and those stated for the future of restoration in many forms for terrestrial, aquatic, and coastal habitats on Fire Island. We support the removal of nonnative, invasive species in the Wilderness Area and throughout Fire Island. However we strongly urge against "the reintroduction of their name counterparts," or, the planting of natives to replace and restore any habitats. Planting any species will suppress the possibility of the immediate species return which will emerge and the extraordinary diversity that will occur. This

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is a diversity which humans, including ecologists, cannot guess at or mimic. To be planting anything in these wild lands is contrary to the spirit and letter of the Wilderness Act and to be doing so anywhere on the Island in a restoration effort is contrary to good biology.

All habitats on this wild Island can restore themselves through a "Self-Heal" restoration approach. This is a no-plant, edit-only approach that must be accompanied by ecological monitoring and oversight during the recovery period of the habit when it is likely that invasives will return. This is an approach that has been developed and used on the mainland, especially in the pine barrens, to great success. Given the proper oversight, the natives will eventually outcompete any returning invasives. It is such a promising technique, in terms of economy, labor, and biological integrity, that it has recently been mandated in the draft Amendments by the Central Pine Barrens Commission on the mainland. It is also an approach familiar to members of our Board and could be shared with NPS staff in a future FI Management Partnership. We invite any inquiries and will offer assistance to the NPS.

WHEN STRUCTURES ARE GONE, THEY ARE GONE FROM THIS BARRIER ISLAND

OSC strongly supports all efforts to honor and work with a shoreline dynamic. To that end we encourage the NPS to rigorously adhere to a policy of abandoning the re-establishment of any and all structures throughout the entire Island under its jurisdiction.

We thank you for this opportunity to comment on the Seashore's Draft General Management Plan. If there are any questions or need for further information, please let us know.

Sincerely yours,

Karen Blumer
Vice President, Open Space Council
Administrator, Carmans River Watershed Trust Fund

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 92

Author Information

Keep Private: No
Name: Linda Miller
Organization:
Organization Type: I - Unaffiliated Individual
Address: UNK
Fair Harbor, NY UNK
USA
E-mail: [REDACTED]

Correspondence Text

September 17, 2015

K. Christopher Soller
Superintendent

Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

I live in Fair Harbor on Fire Island. The community has been in existence before the area came under the jurisdiction of the Fire Island National Seashore.

I wish to continue to live in harmony with the natural environment of this barrier island.

I am in favor of Alternative 3 which will allow new development on the dunes in a manner than is respectful to the dunes and will preserve the dunes.

As I understand it, this alternative offers proactive and collaborative management to balance human use while protecting the environment.

Thank you,

Linda Miller

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 93

Author Information

Keep Private: No
Name: Lawrence J. Sonders, MD
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Dunewood, NY UNK
USA
E-mail:

Correspondence Text

September 10th, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Draft Fire Island National Seashore General Management Plan

I would subscribe to Administration Plan 3 in association to Plan B

28 years ago we came to FI looking to rent for the coming summer and solely by serendipity we were shown the house which we immediately arranged to buy. It has been 28 years of happiness. I am certain that the ambience of FI and particularly our hamlet of DUNEWOOD has increased my longevity.

I suggest that anyone interested in the FI Plan come to Dunewood and see how this community has improved the area by good stewardship of the natural resources of the area

Thank you,

Lawrence J. Sonders MD
[REDACTED] Dunewood

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 94

Author Information

Keep Private: No
Name: Diane Romano
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10011
USA
E-mail:

Correspondence Text

I am a resident of the (Hamlet/Village) of Cherry Grove, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). I have been a homeowner and renter for more than 35 years.

The unique and special character of Fire Island has long been recognized by its residents. Passionate concern for this special place led the residents of Fire Island to seek and facilitate the formation of FINS in 1964 as a way of stopping the "Moses Road." Historically, the relationship between FINS and the island communities had been adversarial, with many areas of tension on management issues.

Over the last several years, however, we have tried to develop a spirit of collaborative stewardship and working partnership but we feel that our hamlet was not properly recognized nor represented as a contributing member. The recently released draft General Management Plan for Fire Island tries to incorporate a new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

"I clearly do not support the Continuation of Current Management Practices described as Alternative #1 under the proposed GMP. I give my support to Action Alternative #3 plus my comments, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

In particular I support the following elements of the Preferred Alternative with the attached revisions:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities. Each community should have at least one community representative on any Management Partnership, Commission and/ or Committee, I have read the entire report and it speaks about all Historic areas but our designated community house and the visitation growth.

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island. This should be a cooperative stewardship also with DEC and a required Environmental impact study. Variances are sometimes a requirement that will help the island resources.

Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole. The GMP constantly refers to the land use standards, but those standards are very old and are outdated. Why wasn't EIS done on the standards to properly evaluate the zoning impacts? Instead we continue to follow a non-conforming document and refer to it for guidance in the GMP.

I most appreciate this opportunity to express my support for the GMP Alternative #3 as described above.

Sincerely,
Diane Romano
President, Cherry Grove Community Association

(Send by via email submission at www.parkplanning.nps.gov/fil is or
USPS mail to:
Fire Island National Seashore GMP
15 State Street
Boston, MA 02109

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 95

Author Information

Keep Private: No
Name: John W. Pappas
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10016
USA
E-mail: [REDACTED]

Correspondence Text

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: FINS General Management Plan

I'm resident of Cherry Grove, one of the communities that came into existence before the formation of FINS. I've been renting at the Grove regularly since 2009 although I have been enjoying the beauty of Cherry Grove and other Fire Island communities since the 1990s.

Fire Island has enchanted all who visit and this spell it creates is what motivated its residents to seek and facilitate the formation of FINS in 1964 as a way of stopping the destruction of the island that Robert Moses proposed via his ill conceived road. Back in the past the relationship between FINS and the residential communities had been adversarial, with many areas of tension on management issues-but lately there has been a great spirit of collaborative stewardship and a real working partnership. I believe that the recently released draft General Management Plan for Fire Island incorporates this new policy of cooperation and dialogue, and acknowledges that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore was established in 1964".

I absolutely do not support the Continuation of Current Management Practices described as Alternative # 1 under the proposed GMP. I wholeheartedly support Action Alternative #3, which recognizes that Fire Island 'is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use.'

The three particular elements of the Preferred Alternative that I support are:

1- Cooperative Stewardship: FINS working collaboratively with Cherry Grove and all of the other communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

2- Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

3- Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole.

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I thank you for this opportunity to express my support for the GMP Alternative #3.

Sincerely,

John W. Pappas

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 96

Author Information

Keep Private: No
Name: Karen M. Kee
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Bronx, NY 10463
USA
E-mail: [REDACTED]

Correspondence Text

Comments in response to the Fire Island National Seashore Draft General Management Plan:

I fully support Alternative three because a partnership between the Fire Island National Seashore and the residents seems to be the only fruitful relationship to ensure a healthy future of this park and this spit of land that could otherwise easily be forgotten by its other governmental authorities. Fire Island is 100% FINS but only a part of Brookhaven Township or Suffolk County or New York State and as such, there is a great deal of comfort knowing this extra layer of authority functions to protect this vulnerable yet fertile land that is rich with history and cultural and natural resources.

I applaud the revised GMP that includes an acknowledgment of and a desire to work with the human population of about 4,000 individuals. This re-definition of the enabling legislation provides comfort to me and my family with knowledge that this National Parks planning document has at its foundation a recognition of the reality that the interactions on this island are among humans, all the flora, fauna, fish, birds and wildlife and the natural environment and those relationships will continue to exist. The natural processes that take place on Fire Island extend beyond the wilderness; there are also unnatural processes on Fire Island resulting from the human population however humans settled there so long ago that not acknowledging their existence is done at Fire Islands peril. Im hoping to see a balance of influence from the National Seashore that helps protect the island from negative influences that threaten the health and safety of the island.

Wastewater management is only one example of the absolutely crucial functions the National Park Service can continue to bring to Fire Island and one that I look to FINS for the leadership required to continue to adhere to laws and policies designed to protect the island. When lobbying for convenient alternatives to any wastewater policies collide with good legislation I expect FINS to be at the forefront of the effort to protect us from ourselves. I hope that the actions FINS might take in such a situation would include public notice of such attempts to circumvent responsible governance. Participation in some kind of an island-wide committee or forum or council for discussing, analyzing and defining appropriate courses of action to stop these kinds of egregious behaviors is something I hope FINS will take on.

In addition to wastewater management, I hope to see this same kind of leadership from FINS when addressing these other crucial aspects of the islands survival: driving regulations, shoreline management, climate change response, land use oversight and the host of other actions FINS might take to mitigate the negative impacts and encourage the positive impacts on the island. This GMP is thankfully full of issues facing Fire Island today and in its future and each alternatives impact on these issues has been articulated in a clear and persuasive manner. I also congratulate the authors for presenting this critical document in such a complete, well written and understandable manner. For a Federal Agency to put forth something so balanced and so attuned to its constituencies is remarkable.

I see FINS as a leader in bringing together the governing agencies, community representatives, experts in health and safety

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and other key influencers in periodic assemblies to identify and create equilibrium in policies and possibly legislation aimed at protecting this pearl in the National Park system: a wilderness and a home for 4,000 people. As a steward of Fire Island, one committed to its future health and safety, and as someone who has been a responsible influencer most of my adult life, I look forward to joining any such committee, forum, council or other yet to be defined gathering of responsible citizens.

Chapter Four, Environmental Consequences of the alternatives addresses the critical issues and impacts of the three alternatives and any reading, even a cursory one, demonstrates for me that Alternative Three is the only alternative that effectively protects the future of Fire Island. Any management plan that ignores a key impact on the focus of the plan is a plan doomed to fail. Human existence and interaction on Fire Island is at the nucleus of the environment and thus must be addressed in any plan, policy or alternative to be considered.

Respectfully Submitted, Karen M. Kee

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 97

Author Information

Keep Private: No
Name: Marsha Hunter and Arthur Weinstein
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Kismet, NY UNK
USA
E-mail: [REDACTED]

Correspondence Text

September 17, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

Re: Comment: Draft Fire Island National Seashore General Management Plan

Dear Superintendent Soller:

We are residents of the Hamlet of Kismet, one of the 17 residential communities on Fire Island that predate the formation of Fire Island National Seashore ("FINS"). We have been homeowners in Kismet for more than 30 years.

We do not support the Continuation of Current Management Practices described as Alternative #1. We strongly support the concept set forth in the Plan under the proposed GMP Alternative #3, which recognizes that Fire Island is a natural landscape with a significant cultural overlay, and recognizes the strong connection between natural and cultural resource protection and use. We support the following elements of Alternative #3:

Cooperative Stewardship: FINS would work collaboratively with Fire Island communities on important issues of land use planning, environmental quality and preserving the distinctive character of our communities

Shoreline management planning: FINS would assume a leadership role and work with all stakeholders to develop a coastal land use and shoreline management plan for Fire Island

Preserving the Island's distinct character: The NPS would work collaboratively with others to help identify, document and preserve the distinctive character of each Fire Island community and Fire Island as a whole. The unique and special character of Fire Island is of major importance and led the residents of Fire Island to support the establishment of the Fire Island National Seashore (FINS) in 1964.

In past years the relationship between FINS and our communities had been difficult. Recently, under your tenure as superintendent (and that of your predecessor), a new cooperative relationship has taken place for which we are extremely grateful and thankful. The draft of the new General Management Plan Alternative #3 recognizes this spirit of cooperation. We support the concept that "the long term management and stewardship of Fire Island's many and varied resources and its communities will require a different approach than has been traditionally taken over the 50 years since the National Seashore

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was established in 1964".

We appreciate this opportunity to express our support for the GMP Alternative #3.

Sincerely,
Marsha Hunter and Arthur I. Weinstein
Kismet, Fire Island

PEPC Project ID: 16782, DocumentID: 66653
Correspondence: 98

Author Information

Keep Private: No
Name: Merry Fisher
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
New York, NY 10075
USA
E-mail: [REDACTED]

Correspondence Text

As a Dunewood, Fire Island homeowner for 25 years I would like to support GMP Option #3 because it addresses important issues:

- 1) preservation of the distinctive character of the 17 diverse communities
- 2) develops a plan for land use and shoreline management
- 3) encourages collaborative planning between the seashore and island communities
- 4) recognizes the balance between residential and natural use of land

Merry Fisher

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 99

Author Information

Keep Private: No
Name: Jeffrey DeJarnette
Organization: Point O' Woods Association
Organization Type: O - Civic Groups
Address: Point O' Woods Association
Point O' Woods, NY 11706
USA
E-mail: jdejarnette@powoffice.com

Correspondence Text

September 16, 2015

Superintendent Chris Soller
Fire Island National Seashore GMP
15 State Street
Boston, MA 02109

Re: NPS General Management Plan

Dear Superintendent Soller,

On behalf of the Point O' Woods Association, I wish to extend our sincere thanks and appreciation to you for creating and promoting the National Seashore General Management Plan. As the oldest of the seventeen longstanding Fire Island communities, we recognize the importance of working collaboratively with our neighbors and the Park Service in managing towards a common vision for the long-term benefit of Fire Island.

While we deal with many issues during the daily course of managing the activities and operations of the Point O' Woods community, we understand and recognize that many of our challenges are not unique and our actions have a direct impact on the local and greater Fire Island natural environment. We understand that our natural environment is a precious resource and applaud the initiatives in the GMP to strike a balance between human activity and our environment.

The Point O' Woods Association fully supports Management Alternative #3 in the National Seashore General Management Plan because this alternative recognizes Fire Island as a natural landscape with a significant cultural overlay and recognizes the strong connection between natural and cultural resource protection and use. In particular we recognize the importance of -

- }- Collaborative stewardship seeded in a positive working relationship with the NPS
- }- Preservation and maintenance of Fire Island's unique character
- }- Maintenance and restoration of Fire Island's Natural Systems, including identifying and preserving its distinct character
- }- Historical preservation and education
- }- Shoreline planning and management

As a community presently developing a long-term capital management budgeting process, Point O' Woods will take this opportunity to reflect on how our long-term financial planning interfaces with the initiatives identified in the NPS General

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Management Plan. We would request the following revision; on page 325 kindly remove Justin McCarthy's name and insert Jeff DeJarnette as the POW Community Representative.

Thank you for your leadership and please contact me should you have any questions.

Very truly yours,


On behalf of the Point O'Woods Association,

Jeffrey DeJarnette, PCAM
General Manager

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 101

Author Information

Keep Private: No
Name: Marsha Hunter
Organization: The Kismet Community Association  Official Rep.
Organization Type: I - Unaffiliated Individual
Address: PO Box 284
Brightwaters, NY 11718
USA
E-mail:

Correspondence Text

October 1, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

RE: Comment: "Draft Fire Island National Seashore General Management Plan"

Dear Superintendent Soller.

The members of the Kismet Community Association wish to express their support of "Alternative #3 of the proposed General Management Plan of the Fire Island, National Seashore. We represent the 225 homeowners in the Hamlet of Kismet, Town of Islip.

Our homeowners, their guests and visitors relish and cherish the natural beauty and uniqueness of our Island and believe that the environmental and cultural elements described in the Plan can co-exist with our community. Indeed our predecessors (as well as some of our current homeowners) were part of the effort responsible for the very creation of the National Seashore.

The Kismet Association strongly supports Alternative #3 of the GMP, which recognizes that Fire Island is a natural landscape with a significant cultural overlay and strong connection between natural and cultural resource protection and use. That alternative correctly proposes that FINS work collaboratively with Fire Island communities on important issues of land use, planning, environmental quality and preserving the distinctive character of the communities. It is basic to Alternative #3 that the strong presence of and interaction with the community associations is critical to the success and goals of the new GMP. Alternative #3 will provide the National Seashore with a stronger relationship with the communities to foster recognition that the communities are within and a part of a National Park-an understanding that has not always been fully achieved by the communities or FINS.

We appreciate the opportunity to comment and express support.


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Very truly yours,
The Kismet Community Association
By: Marsha Hunter
President

PEPC Project ID: 16782, DocumentID: 66653

Correspondence: 102

Author Information

Keep Private: No
Name: Suzanne Goldhirsch
Organization: Fire Island Association  Official Rep.
Organization Type: O - Civic Groups
Address: 201 E. 87th Street, #7P
New York, NY UNK
USA
E-mail: suzy.goldhirsch@mssm.edu

Correspondence Text

October 5, 2015

K. Christopher Soller, Superintendent
Fire Island National Seashore
U.S. National Park Service
120 Laurel Avenue
Patchogue, N.Y.

Dear Superintendent Soller,

The residents of Fire Island warmly congratulate you and the National Park Service (NPS) on the publication of the draft General Management Plan (GMP) for Fire Island National Seashore (FINS). We recognize that you have successfully brought forth a complex planning document that is the culmination of years of effort. In addition to acknowledging your key leadership role, we are very grateful to FINS' planning staff and their NPS colleagues, with special mention of Ms. Ellen Carlson, for their work on this important initiative. We have been particularly impressed by the efforts that were made to delve into some very complicated and thorny issues, to gather feed-back in a facilitated manner, and to listen carefully to the opinions of all those who live and work on Fire Island.

Commenting on a document of this scope and complexity is a daunting and time consuming task. Drilling down into specific details is clearly not the purpose of this letter.

On behalf of the 17 Fire Island communities, I will use this opportunity to offer general observations on five topics: (1) the positive change in the relationship between FINS and the communities; (2) Fire Island Association (FIA) support for the preferred management alternative; (3) the style and tone of the document; (4) some areas of concern; and (5) the challenges of implementation.

1. FINS and the Fire Island communities: As you know, the historical relationship between FINS and Fire Island's residents has not always been a felicitous one. During your tenure as superintendent, however, a new management approach based on trust, partnership, and finding the common ground has evolved. Indeed, a genuine "sea change" in the dynamic between FINS and the communities has been evident during the GMP

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process itself. Almost five decades after the creation of the Seashore, the communities have been brought fully into the discussions about how to protect, preserve, enhance, administer and manage Fire Island. With dialogue now substituted for discord, FIA Board Members and community leaders participated in FINS workshops dealing with various GMP planning options. Fire Islanders were also encouraged to engage in the web-based Community Character Analysis and to attend public comment sessions. In your role as FINS Superintendent, you have also regularly attended the monthly meetings of the FIA Board of Directors to give updates on the GMP process, and to engage in frank and constructive discussion of the issues.

The creation of this new Fire Island GMP is a particularly timely initiative, given the many challenges that threaten the integrity of our bay and ocean shorelines, imperil the natural beauty of the barrier beach environment, undermine the road-less character of the Island, and cast doubt on the sustainability of the unique quality of life that makes Fire Island so remarkably different from almost any other place in the world. FIA has been energized by your offer of partnership and stewardship, and we have devoted a significant amount of organizational time and energy to working collaboratively with you to identify, describe and document a shared vision of what Fire Island should be, and how it should be managed over the next 20-25 years.

2. SUPPORT FOR THE PREFERRED MANAGEMENT ALTERNATIVE: The creation of a new GMP for Fire Island is a critically important event for our membership because it outlines the policies and principles that will shape the long-term management of a very special place. To say that the entire island has waited for the publication of this document with a mixture of impatience and excitement tinged with apprehension would not be an understatement. It is therefore with great pleasure that I advise you and your planning colleagues of the wide-spread and enthusiastic support for the NPS Preferred Alternative #3: 'Recognizing the Relationship between Human Use and Nature.' Fire Island residents are especially supportive of the following specific policies and/ or management guidelines included in this alternative:

- The GMP recognizes that there is constant interaction between the human/built environment and the natural landscape; both natural factors and human activities affect the dynamic nature of the barrier island.
- NPS will make a permanent commitment to the principle of cooperative stewardship where FINS, the Fire Island communities, and other relevant stakeholders will work collaboratively to protect and preserve the island for future generations.
- Options to accomplish and sustain this collaborative approach would include an advisory commission, or a Fire Island Management Partnership.
- NPS will consider amending the Seashore's enabling legislation to include language recognizing the role of the Fire Island communities as partners in its management.
- NPS will assume a leadership role in working with Fire Island communities and other key stakeholders to develop a coastal land use/shoreline management plan for the island that would be consistent with the TFSP for FIMP.
- Fire Island will be managed in a manner that preserves its natural, historical and scenic aspects, and embraces the island's unique cultural character. In connection with this objective, NPS will work to encourage and support the identification and preservation of the distinctive character of each Fire Island community, and of the island as a whole.
- The "road-less" environment of Fire Island will be supported, and driving kept to a minimum.

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3. THE LANGUAGE AND TONE OF PARTNERSHIP: One of the central and recurring themes woven into this GMP document is the critical importance of a close coordination between the NPS, the FIA, the Towns and Villages and other responsible government agencies and stakeholders who must work together holistically to solve island-wide problems as a collective body as opposed to operating in isolated silos. The skilled and compelling use of language and tone to lay out the case for collaboration and partnership (especially in the Superintendent's Message and the Executive Summary contained in the widely circulated GMP Newsletter #4; March 2015) is quite remarkable for a public document and deserves special notice. The eloquently conveyed message is one of a longterm commitment by NPS to finding the common ground on which to build a cooperative stewardship management approach for Fire Island.

4. SOME AREAS OF CONCERN: Although the Preferred Alternative enjoys wide-spread support among Fire Island residents, there are some areas of concern which we would like noted in the record of public response:

- Defining cooperative stewardship: The FIA has embraced the notion of a cooperative partnership with FINS, especially one wherein the partners work to 'find the balance,' and where there is a mutual confidence that understandings will not be reversed either by new Park staff and policies, or by changes in Community or FIA leadership. Some residents have reservations, however, about how FINS will define, operationalize, and sustain the concept of "Cooperative Stewardship."
- Mechanism to promote collaborative stewardship: FIA agrees that there is a need for a mechanism to promote collaboration between the multiple public and private stakeholders on the island. While we support the exploration of options to sustain this collaborative approach (an advisory commission, or a Fire Island Management Partnership), we insist that these entities be advisory and consultative in nature. Any attempt at creating yet another 'layer of governance' on the island would be misguided and doomed to failure.
- Visitor experience: FIA acknowledges the complex interplay between the communities, visitors, ferry companies, island businesses, and the park itself. Fire Island residents have always welcomed visitors from the Mainland who come to enjoy the Island for the day, or the evening, or perhaps longer. Recently however, dramatically increased numbers of visitors, many of whom seem to be looking for a party atmosphere on an Island that has a reputation for few rules, have caused the communities to re-think the idea of visitation, public information and "way finding." Many island stakeholders are coming to the conclusion that Fire Island may have a finite carrying capacity, and that visitor 'overload' is straining the resources of the communities, the municipal jurisdictions, the local volunteer fire and ambulance services, the lifeguard resources, and the Suffolk County Police Department.

In the context of this pervasive anxiety about the burdens of visitorship, the NPS intention to create more opportunities to link the Seashore visitor experience with the communities must be carefully planned in collaboration with the individual communities.

- Inter-community Bicycle Working Group: FIA strongly opposes the creation of bicycle trails because of safety and traffic concerns, and the threat such a trail would pose to the unique character of Fire Island. An island-long bike trail is inappropriate for the following reasons:

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- It would require additional paving of an island that Congress has said will be preserved in its natural state.
- Such a trail would not be permitted in the Wilderness Area.
- The inevitable use of the trail by ATVs and golf carts would increase intercommunity travel, thereby reducing community diversity and uniqueness, which has evolved due to discontinuity of lateral access on the Island.
- Congestion of east-west routes within communities is already a major problem. Some communities have found it necessary to regulate bicycle use on weekends and nights. A bicycle path would increase the need for such regulation throughout the Island.
- Facilitating increased thru-island vehicular access would pose a threat to security of Fire Island residences and businesses, especially in the off-season.

5. THE CHALLENGES OF IMPLEMENTATION: FIA shares with FINS a belief that moving forward constructively in a collaborative manner on a shared management vision found in the Preferred Alternative will enhance Fire Island's status as one of the country's great national parks, and most desirable places to live in or visit. We are very pleased that the FIA has been welcomed as a valued partner, not only in the development of the GMP document, but also in the critically important quest for effective implementation strategies and mechanisms. FIA looks forward to working closely with FINS to maintain the Island's natural beauty, preserve the communities' varied and unique characters, restore the native ecology, expand visitor services in a rational and sustainable manner, and build philanthropic support for FINS.

Our enthusiastic support of the conceptual management framework outlined in the GMP is tempered, however, by very real questions concerning "next steps." After the long and complicated effort to reach consensus on a set of management policies and guidelines which will be approved as the final version of the GMP, it seems clear that the work has only just begun. The management principles set forth in the preferred alternative are general in nature, and there will be complex issues to address before they can be fleshed out with specific details. Given the turmoil in Washington about the federal budget, there is also a very real concern about finding the funds to implement actions consistent with the GMP after it is approved.

Having extended our hands to each other in partnership, FINS and FIA must now roll up our sleeves and get started on the hard work of turning the concepts of the GMP into real life practice. Some of the questions that we will face include:

- How will general "Cooperative Stewardship" principles and a theoretical partnership between FINS and the Island stakeholders be implemented? What will the new management model actually look like?
- How will recommended strategies be translated into specific management protocols for day-to-day FINS decision-making on a wide range of issues impacting our cultural, environmental and recreational resources?
- What will the formal entity or structured process for dialogue and decision-making finally look like? Who will be the participants? How will they be chosen?
- There are many references in the GMP to coastal land management, property-rights, and zoning that are very complex, and that neither FINS nor the developed communities can pursue in a vacuum. How will other government entities fit into the partnership picture on these matters?
- If implementation of the new GMP is to move forward, just how will we (FINS and

FIA) encourage the currently dysfunctional tangle of multiple jurisdictions (Federal, State, County, Towns, and Villages) and regulatory agencies (DEC, Fish and Wildlife, Marine Fisheries, USACE, etc.) to join us in a collaborative program of rational and constructive interactions for the benefit of the Island, its environment and its communities?

In summary, the FIA appreciates this opportunity to offer our enthusiastic support for the NPS Preferred Alternative (Recognizing the Relationship between Human Use and Nature). We also respectfully request that the concerns we have identified be taken into consideration during any further revision of the GMP document. And finally, we all know that 'the devil is in the details' where implementation of the GMP is concerned. Therefore we urge that sufficient NPS resources (financial, staffing, and administrative) should be devoted to identifying robust implementation strategies and mechanisms.

Regards,
Suzy Goldhirsch
President
Fire Island Association

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