



FIRE ISLAND NATIONAL SEASHORE

Abbreviated Final

General Management Plan–Environmental Impact Statement

2016



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Letter from the Superintendent



The National Park Service (NPS) is pleased to complete the general management planning process for Fire Island National Seashore. With the publication and release to the public of the Fire Island National Seashore Abbreviated Final General Management Plan/Environmental Impact Statement (Abbreviated Final GMP/EIS) the NPS has completed the final step in the extensive planning process the Seashore has been engaged in since 2006. The Abbreviated Final GMP/EIS document contains an analysis of comments received on the Draft GMP/EIS with NPS responses, errata sheets detailing editorial corrections to the Draft GMP/EIS, and copies of letters received from agencies and organizations. Presented in an abbreviated format, the document complies with the National Environmental Policy Act's (NEPA) planning requirements. The abbreviated format document is meant to be used in combination with the Draft GMP/EIS. The public comment analysis in the Abbreviated Final GMP/EIS refers back to the draft document in order to respond to those public comments; additionally the errata indicate the changes made to the text of the Draft GMP/EIS. Because no substantial changes to the alternatives or the impact analyses presented in the Draft GMP/EIS are required, the abbreviated format of the Abbreviated Final GMP/EIS has allowed for the production of this document and avoids the reprinting of the entire 500-plus page document.

The Abbreviated Final GMP/EIS Selected Alternative (Management Alternative 3 for Fire Island in combination with Management Alternative B for the William Floyd Estate) has been identified as the NPS preferred alternative because it best meets the Seashore's management goals and conveys the greatest number of significant beneficial results relative to its potential impacts in comparison with other alternatives. The Selected Alternative would do the most to ensure the cooperative stewardship of Fire Island National Seashore's dynamic coastal environment and its cultural and natural systems while recognizing its larger ecological, social, economic, and cultural context.

The public release of the Abbreviated Final GMP/EIS will be followed by a 30-day no-action period, after which the NPS will issue a Record of Decision (ROD) to document the selected alternative. The Abbreviated Final GMP/EIS and the Draft GMP/EIS constitute the documentation upon which the record of decision will be based. After the ROD is issued the NPS will publish a Abbreviated Final GMP that will only discuss the Selected Alternative and supporting documentation for the Selected Alternative as found in the Abbreviated Final GMP/EIS.

Again, the NPS is excited to move forward with the general management planning process and share this final document with Fire Island National Seashore's many constituents and stakeholders. It is timely that the release of this monumental planning document for Fire Island National Seashore coincides with the National Park Service's Centennial. It is a time for celebration at National Parks around the United States. Here at Fire Island, we can celebrate both events with the public and Seashore stakeholders.

A handwritten signature in dark ink, reading "Chris Joller". The signature is written in a cursive, flowing style.

Overview and Process

INTRODUCTION

This document is the Fire Island National Seashore Abbreviated Final General Management Plan and Environmental Impact Statement (Abbreviated Final GMP/EIS). The material included here is to be combined with the Fire Island National Seashore Draft General Management Plan and Environmental Impact Statement (Draft GMP/EIS) that was distributed for public review in June 2015. The 90-day public review period was held from June 19, 2015 through September 17, 2015. This document is composed of a summary of the public review process for the Draft GMP/EIS, the National Park Service (NPS) responses to public comments, errata detailing editorial changes to the Draft GMP/EIS, and copies of comment letters from agencies, business, and other organizations (Appendix A).

An Abbreviated Final GMP/EIS is used because the comments received on the Draft GMP/EIS require only “minor changes involving only factual corrections or explanations of why comments do not warrant further response” (NPS NEPA Handbook 2015). No substantial changes have been made to the alternatives or to the impact analyses presented in the Draft GMP/EIS as a result of public comments. Rather than updating and republishing the Draft GMP/EIS as a full-length 500-plus page document, this abbreviated final incorporates the Draft GMP/EIS by reference and responds to comments and text changes within an errata that is included within this document.



Following the public release of this Abbreviated Final GMP/EIS, there will be a 30-day no action period, after which the NPS will prepare a Record of Decision documenting the selected alternative and setting forth any stipulations for implementation of the GMP. This Abbreviated Final GMP/EIS and Draft GMP/EIS will constitute the complete and final documentation upon which the Record of Decision will be based.

SUMMARY OF THE PUBLIC REVIEW PROCESS

The Draft GMP/EIS was released for public review on June 19, 2015. The Draft GMP/EIS was available at the park and on the National Park Service's Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/fiis>). Information about the review period was sent out to the Seashore's GMP mailing list and posted on the Seashore's website page. The public was able to submit comments on the plan using any of the following methods: electronically through the PEPC website; in person at public open house meetings or by mailing comments to the NPS.

During the comment period, NPS hosted two public open house meetings: one in June at the Watch Hill Ferry Terminal in Patchogue and the other in July at the Ocean Beach Community Center. The purpose of the open house meetings was to provide information and answer questions on the Draft GMP/EIS, distribute copies of the document and accept public comments. The review period was 90 days and ended on September 17, 2015.

COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and combine similar public comments into a format that can be used for analysis by the NPS. By using this technique, the NPS can address the comments received by identifying and organizing the topics and issues expressed in each group of similar comments. The topics and issues are then captured in "concern statements" followed by one or more example quotes best representing the concern expressed by that group of comments. The example quotes are not intended to be an exhaustive list of every comment but are instead a representation of the types of comments received.

All comments were read and analyzed. The analysis process attempts to capture the full range of public concerns received on the Draft GMP/EIS. However, it should be noted that comments from people who chose to respond do not necessarily represent the sentiments

of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on content of the comment rather than the number of times a comment was received. The information in this chapter is intended to be a summary of the comments received, rather than a statistical analysis.

RANGE OF COMMENTS

A total of 102 pieces of correspondence were received, all of which were carefully reviewed by the NPS. From these, a total of 407 distinct comments were extracted and grouped according to similar issues and concerns expressed.

The most prevalent concerns expressed in the comments received included the following topics:

- Natural Resource Management (ticks, water quality, marine mammals)
- Shoreline Management
- Seashore Experience (educational outreach, community impacts from visitor use)
- Land Use and Development (regulations and processes/ NPS role)
- Transportation (vehicular access)
- Park Administration (cooperative management body, Alternative 3, concurrent planning process)
- Fire Island Wilderness (consistency with the Wilderness Act, wilderness monitoring)
- William Floyd Estate

A majority of the comments received stated a preference for, or opposition to, one alternative or another, which the NPS acknowledges and has considered. A number of comments addressed very specific concerns, made very specific suggestions or asked for more detail. While we have reviewed and acknowledge these comments, we note that an NPS general management plan is meant to make broad decisions about the overall management of the park and the EIS is meant to compare and contrast the environmental implications of those broad decisions. If, in the future, implementing the selected approach for the GMP would result in site specific environmental impacts, the NPS will conduct appropriate site specific planning and compliance at that time.

The Environmental Protection Agency (EPA) also provided comments on the Draft GMP/EIS, rating the proposed project as EC-2 (Environmental Concerns - 2), indicating that the Draft GMP/EIS does not

contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment. EPA has requested additional information be included in the the Abbreviated Final GMP/EIS.

LIST OF COMMENTERS

The following government agencies and organizations submitted comments on the Draft GMP/EIS. Copies of letters received from agencies are in Appendix A. Some individuals submitting comments chose to list themselves as a member of a group. This does not necessarily mean that the comments represent the official group. Copies of all letters are available in electronic format upon request, with individual names and addresses removed.

Federal Agencies

- Environmental Protection Agency
- National Oceanic and Atmospheric Administration/
National Marine Fisheries Service
- U.S. Fish and Wildlife Service

State Agencies

- New York State Historic Preservation Office

Regional or Local Government Agencies

- Fair Harbor/ Dunewood Medical District
- Fire Island Union Free School District
- Town of Brookhaven, New York
- Village of Ocean Beach, Fire Island

Organizations

- Animal Welfare Institute
- Audubon New York
- Center for Environmental Research and Coastal
Oceans Monitoring (CERCOM) at Molloy College
- Corneille Estates
- Dunewood Property Owners Association
- Fire Island Association
- Fire Island Conservancy, Inc.
- Fire Island Lighthouse Preservation Society, Inc.
- Fire Island Year Round Residents Association
- Fire Island Wilderness Committee
- Fire Island Wildlife Foundation
- JUST:US Coalition to Serve and Preserve Fire Island
- Nassau Hiking and Outdoor Club, Inc.
- Open Space Council
- Point O Woods Association
- Seatuck Environmental Association
- Sierra Club, Long Island Group

- South Shore Audubon Society
- Summer Club
- The Kismet Community Association
- Water Island Association

ANALYSIS OF SUBSTANTIVE COMMENTS AND NPS RESPONSES

The NPS has provided written responses to those pieces of correspondence that have either substantive comments or comments that the NPS planning team determined required a written response for clarification.

Substantive comments are those comments that:

- Question, with reasonable basis, the accuracy of information in the environmental impact statement.
- Question, with reasonable basis, the adequacy of the environmental analysis.
- Present reasonable alternatives other than those presented in the environmental impact statement.
- Cause changes or revisions in the proposal.

Substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the preferred alternative or alternatives, or those that only agree or disagree with NPS policy are not considered substantive (NPS NEPA Handbook 2015). The NPS analysis of the substantive comments received on the Draft GMP/EIS with NPS responses is provided below. Where appropriate, text in the Draft GMP/EIS has been revised to address comments and changes (as indicated in the following responses) in an errata included within this document. Unless otherwise noted, all page number citations refer to the Fire Island National Seashore Draft General Management Plan / Environmental Impact Statement (June 2015).

Substantive Comments and NPS Responses

Natural Resource Management: *Tick Management*

Concerns: Commenters expressed concern that the NPS would prohibit the use of the 4-Poster baiting stations within the Seashore's boundary. Commenters note that their observations and recent research suggest that 4-Posters are an effective form of tick management.

Examples of Quotes:

"Each year the community members, visitors and trades people want to be reassured that the Four Poster tick prevention program continues. The Fair Harbor/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."

"The GMP makes short thrift of the 4 poster program although it has been successfully treated and used in the Saltaire and Fair Harbor communities since the start of the original study in 2008."

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



Response:

As discussed in the Draft GMP/EIS (p. 55), the NPS does not support the use of the 4-Poster devices on federal lands, because the devices provide a regular, introduced food source for the deer population. The NPS would continue to monitor ticks throughout the Seashore and provide education to visitors regarding ticks, tick-borne illnesses, preventive measures to avoid exposure to ticks and tick bites, and what to do in response to tick bites. The NPS would continue to focus its primary tick surveillance and management efforts at the William Floyd Estate. (See section on the William Floyd Estate for more information.) As indicated on p. 68, this approach would be considered common to all alternatives.

In January of 2012, the New York State Department of Environmental Conservation (NYS DEC) registered 4-Poster Tickicide along with assigning a Special Local Need Supplemental Labeling for the device to be used as part of an integrated pest management program in Suffolk County, NY. The Seashore issued a Letter of Authorization for communities as requested with proof of a current NYS DEC permit in order to understand the data and management of the 4-Poster devices. The NPS is not the regulatory or authorizing agency for the use of the 4-Poster device or the use of broadcast spraying of insecticides within the Fire Island communities. NYS DEC regulates and issues permits for use of the 4-Poster devices in the Fire Island communities.

Natural Resource Management: *Water Quality*

Concerns: Commenters raised issues related to water quality in the Great South Bay in a number of contexts. One noted the benefits of flushing the bay that resulted from the opening of the wilderness breach and suggested that the NPS take steps to ensure that such a condition continues. Several others made comments related to wastewater management. Finally, one commenter raised concerns about the quality and scope of the water quality analysis suggesting that existing research had been overlooked.

Examples of Quotes:

“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.”

“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.”

“Open Space Council (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.”

“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.”

Response:

The level of analysis undertaken for this general management plan is appropriate for a policy level document. The Draft GMP/EIS commits the NPS to undertaking more in-depth analysis in subsequent implementation planning efforts. The Draft GMP/EIS recommends additional research to assess conditions, identify data gaps, and establish a baseline for monitoring conditions in the marine environment. Specifically, the Draft GMP/EIS recommends that the Seashore work collaboratively with its partners to pursue marine research and monitoring (p.71). The research program would address the development of maps and baseline data for natural and cultural resources, periodic trend analysis, and evaluation of changes in resource conditions. Monitoring would be designed to detect significant changes in marine resources (e.g., water quality) and used to inform both management and research, with particular emphasis on waters within the Seashore’s boundary, acknowledging the larger context of these resources in the Great South Bay and Atlantic Ocean.

The Draft GMP/EIS calls for the development of a Wastewater Management Plan (p.71). The NPS would initiate a Fire Island-wide process to evaluate the issues and impacts associated with the present state of wastewater on Fire Island on both federal and non-federal lands, outline a range of possible alternatives for addressing them, and develop a cooperative implementation strategy to address the issues identified. The Wastewater Management Plan would be prepared as one of several other initiatives proposed in the Draft GMP/EIS all of which would address factors related to protecting and enhancing water quality in the bay. These initiatives would include the Coastal Land Use and Shoreline Management Plan (p.72), evaluating existing land use and development regulations, and undertaking marine research and monitoring.

Natural Resource Management: *Marine Mammals*

Concerns: The National Marine Fisheries Service expressed concerns that the Draft GMP/EIS did not consider potential impacts related to transportation and access (including maintenance of navigation channels, off-shore mooring, etc.) that could result in vessel strikes on marine mammals.

Examples of Quotes:

“Page 211: Impacts Related to Transportation and Access Actions (Impacts on Water Resources) This section notes that elimination of the Sailors Haven Marine could increase the number of boats that moor offshore, but the possible effects of the changes in moorings on ESA-listed species (e.g., increases in vessel strikes) are not discussed in the document. In addition, the effects of any maintenance or construction of docks or other in-water structures would need to be analyzed.”

“Page 243: Impacts Related to Transportation and Access Actions (Impacts Common to All Alternatives-Special Status Species) This section considers the effects of “motorcraft noise,” but it does not consider the potential effects of vessel strikes on sea turtles, whales, or sturgeon.”

Response:

While it is true that the potential for vessel strikes exists, there have been no documented vessel strikes within the Seashore boundary to date, and the number of vessels within the 1000’ ocean boundary is relatively limited and not likely to increase significantly. There is no protocol to mitigate the effects of vessel strikes on sea turtles or marine mammals. The Seashore already employs a number of mitigation methods to minimize impacts to marine mammals and the marine environment. Certain operations have restrictions on the time of year when work may occur in order to prevent impacts to certain fish species and surveys are completed in areas where work is proposed to ensure that species are not present. As noted, the Draft GMP/EIS is a policy level document that analyzes impacts at a broad scale. The potential for vessel strikes of sea turtles or marine mammals can be more appropriately handled at the implementation level through project-specific consultation with the National Marine Fisheries Service (NMFS) in accordance with Section 7 of the Endangered Species Act.



Shoreline Management

Concerns: Commenters referred to issues related to shoreline management. Several noted that the interim shoreline management effort known as Fire Island Inlet to Moriches Inlet (FIMI) was not adequately described in the Draft GMP/EIS. Others highlighted the role that the barrier island plays in protecting Long Island’s southern shore and raised concerns about protecting the bayside of Fire Island. There were also comments on post storm response that addressed the coordination of post-storm services and communication to affected communities and post-storm reconstruction.

Examples of Quotes:

“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.”

“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.”

“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.”

“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... 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.”

“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.”

The NPS would work with other federal and state agencies, towns, communities, and state and county parks to incorporate a post-storm recovery plan for Fire Island into the larger shoreline management planning efforts.

Response:

The Fire Island Inlet to Moriches Inlet (FIMI) project is an expedited approach to complete a stabilization effort independent of the Fire Island to Montauk Point Reformulation Study (FIMP). The U.S. Army Corps of Engineers, State of New York and U.S. Department of the Interior have developed FIMI, a mutually acceptable one-time stabilization plan along Fire Island, to provide protection until implementation of the larger FIMP initiative occurs. FIMI was developed as an emergency stabilization in response to Superstorm Sandy. A brief description of FIMI and how it relates to the larger FIMP has been added to Chapter One of the plan (see Errata, for p.27).

The Draft GMP/EIS calls for the development of plans to address coastal land use and shoreline management and post-storm recovery (see pp. 72 -73). The Coastal Land Use and Shoreline Management Plan would address shoreline protection, land-use controls, site planning, and design standards, and post-storm response in the context of the dynamic barrier environment and emerging trends resulting from sea-level rise and climate change. The Coastal Land Use and Shoreline Management Plan would address both the bay and ocean sides of the island and would be consistent with the Tentative Federally Supported Plan (TFSP) for FIMP and would articulate a comprehensive strategy for protecting coastal resources while addressing resilience in land-use development within the coastal zone on both federal and non-federal lands within the Seashore.

The NPS would work with other federal and state agencies, towns, communities, and state and county parks to incorporate a post-storm recovery plan for Fire Island into the larger shoreline management planning efforts.

Finally, the Draft GMP/EIS calls for the creation of a formal cooperative stewardship forum (p.76) that would foster communication, coordination, and collaboration among the key partners in managing Fire Island on an on-going basis and post-storm recovery efforts.



Seashore Experience: *Educational Outreach*

Concerns: Commenters made suggestions about different opportunities for educational outreach to a variety of audiences including educators, Fire Island residents, and local officials. Their comments emphasized the need to educate various audiences on fostering stewardship for the distinctive qualities and character of Fire Island and acknowledging the dynamic nature of the barrier island.

Examples of Quotes:

“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.”

“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.”

“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.”

The NPS would work with communities and agencies to ensure that property owners and the general public fully understand the dynamic nature of the barrier island and the potential risks associated with owning and managing property within the coastal environment.

Responses:

Educational and public outreach is an important Draft GMP/EIS element and is integrated into a variety of management areas. Overall, as outlined in the Draft GMP/EIS, the NPS would enhance its public outreach program through a variety of means, including the use of technology and social media. The NPS would expand educational outreach that would highlight the Seashore's resources, resource issues, and current park science and scholarship.

In the context of resource management, the Draft GMP/EIS calls for the expansion of opportunities for public involvement in research and scholarship (p. 69) that encourage individual stewardship of natural and cultural resources including engaging in sustainable practices, taking actions to eliminate or reduce the spread of invasive species, and participating in the documentation of the cultural heritage on Fire Island and at the William Floyd Estate. The NPS would also model "best management practices" at the Seashore for activities like energy and water conservation, and wastewater management on federal lands and work with others to encourage "best management practices" for activities Fire Island-wide, including the development of demonstration projects to pilot new ideas and broadly share results.

Public outreach will be fundamental to shoreline management efforts (p. 73). The NPS would work with Fire Island communities, state and local agencies, the realty community, and others to ensure that property owners, property managers, and the general public fully understand the dynamic nature of the barrier island and the potential risks associated with owning and managing property within the coastal environment. Through

personal communication, publications, online media, and formal training and workshops, the NPS and its partners would work to communicate this important information.

Finally, the NPS would reach out to state and local officials through training workshops or other formats to address the application of the federal zoning standards or other relevant topics (see p. 75).



Seashore Experience: *Community Impacts from Visitor Use*

Concerns: In the context of Management Alternative 3 (the preferred alternative), commenters expressed concern about the impacts that a more integrated visitor experience may bring. Concerns included increased visitation to Fire Island communities and the impacts it might have on community infrastructure, amenities and costs. Others raised concerns about added congestion, the potential for more conflicts with motorized vehicles (e.g., the golf carts in use in many communities) and fears that the consideration of bicycles for lateral transportation across Fire Island could degrade the roadless environment.

Examples of Quotes:

“With the NPSs 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.)”

“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”

an expansion of visitor numbers to these communities, an already challenging carrying capacity situation could be exacerbated. If changes result not in an expansion of visitor numbers, but in changes to the composition of their visitation, then there would likely be little impact on carrying capacity. Participation in community-oriented programming would be voluntary and the Seashore would not develop such programming without the collaborative input of the affected community.

In general, visitor use impacts in the private communities are beyond the scope of the Seashore’s management responsibilities and authorities and would be addressed by the communities themselves. Seashore visitors would be made aware of the private nature of the communities and would be asked to respect private property. Fire Island visitors currently take advantage of restaurants and shops as well as enjoy the architecture and overall ambiance of Fire Island’s distinctive communities and are expected to continue.

Responses:

Under Management Alternative 3, the NPS would work to increase the distribution and dispersion of visitors across Seashore facilities and encourage a broad range of experiences (see p. 88). The NPS would collaborate with Fire Island communities on programs and special events to link experiences across Fire Island for residences and visitors to understand the connections between the natural resources of the Seashore and Fire Island communities. Engagement in programs and special events would be voluntary and would not take place without the expressed interest and support of a community.

In Fire Island communities, particularly those with high day-use visitation, a higher profile for their heritage resources could have a long-term impact on their visitation in terms of either numbers or composition. For some of these communities, carrying capacity has been identified as a particular issue. If these changes result in

Transportation: *Vehicular Access—Burma Road from Robert Moses State Park to Kismet*

Concerns: Commenters indicated that they wanted to be sure that access for vehicular traffic is maintained on the Burma Road between Kismet and the Robert Moses State Park.

Examples of Quotes:

“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.”

Responses:

The designated route, “Burma Rd”, between Robert Moses State Park and the community of Kismet is currently used in a variety of ways, including for pedestrian and vehicle traffic. This route is used for access into the Seashore by NPS staff, emergency service vehicles, and driving permit holders (e.g., contractors and full-time residents). The Draft GMP/EIS does not propose changes to the use or administration of this route (see p. 63).

“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.”



Land Use and Development: *Regulations and Processes—NPS Role*

Concerns: Commenters raised questions and some concerns about the role of the NPS in local land use regulations and processes. There were questions about the principal objectives of regulation and what they were meant to achieve. There were also concerns about the NPS relinquishing what was perceived as its obligation to preserve the natural values of Fire Island over other resource values and potentially permitting more development across the island.

Key questions derived from these comments include:

- What are the objectives of regulations?
- Do we have the right regulations? How effective are the present regulations?
- What should regulatory standards be? Is it really zoning?
- What are the roles and responsibilities of various levels of government?

Examples of Quotes:

“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. 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.”

“Let each community solve their individual problems... And not have Islip or the fire park service make sweeping regulations that similarly effect all the fire island communities similarly.”

“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.”

“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.”

“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.”

“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?”

Responses:

The Seashore's enabling legislation includes provisions allowing for private land to be retained or developed if zoning requirements are met and directs the Secretary of the Interior to issue federal zoning standards (Secretary's Standards)(36 CFR Part 28 Zoning Standards for Fire Island National Seashore) for adoption and implementation by each local entity authorized to regulate development within the Seashore. Congress conceived that the local authorities would retain primary authority over the regulation of land use and development and that the federal role would be limited to reviewing variance requests with little need for monitoring or enforcement.

Although local zoning codes were at one time determined to be consistent with the Secretary's Standards with some exceptions, code amendments have diminished those consistencies that once existed. The Seashore has not regularly enforced the Secretary's Standards due to a lack of acquisition money and sufficient staff to be a full-time zoning and building permit review entity. Further, the only enforcement tool which the Secretary is authorized to use to enforce non-compliance with the Secretary's Standards is condemnation; however, condemnation is seen as too harsh a tool for many violations. While Congress anticipated continued development in the communities, current development is more than double the number of homes which were on the island in 1964 and there is substantially more commercial use in some of these communities. However, the community development districts have not expanded and perceived new development has largely involved the infilling of legal vacant lots.

As described on p. 74 of the Draft GMP/EIS, the NPS would work in collaboration with Fire Island stakeholders to revise the Secretary's 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 make efforts to provide the local zoning authorities and local realtors training on the Secretary's Standards and other applicable topics related to land use



and development. Education outreach related to living on a barrier island and within a national park would be important messaging when collaborating with local authorities. Numerous references to varying educational outreach opportunities can be found on pp. 73 - 75 in the Draft GMP/EIS.

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.

The Coastal Land Use and Shoreline Management Plan described on p. 72 would be developed through a collaborative process and would directly influence the development of revised land use regulatory standards. As currently conceived, the Coastal Land Use and Shoreline Management Plan would address shoreline protection, land use controls, site planning and design standards, and post-storm response in the context of the dynamic barrier island environment and emerging trends resulting from sea-level rise and climate change. The Coastal Land Use and Shoreline Management Plan will consider bay shoreline development and protection of natural resources.

Park Administration: *Cooperative Management Body*

Concerns: Commenters applauded the idea of greater communication, coordination, and cooperation but raised questions and concerns about how it would be composed and how it would ultimately work. A large number of commenters raised concerns about community autonomy and the separate and distinct way that they conduct community business. Others wanted assurances of a seat at the table ensuring that their interests would be represented. More information about what the cooperative management body would address was requested. Some specifically cited a desire that driving be among the topics that the body takes up. Some commenters also requested that the Wilderness Council be specifically represented on the cooperative management body.

Examples of Quotes:

“I am against the involvement of NPS partnering and/or making decisions with FIA.”

“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.”

“With the attempt of 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.”

“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.”

“Each community should have at least one community representative on any Management Partnership, Commission and/or Committee”

The NPS anticipates that the cooperative effort to develop a Coastal Land Use and Shoreline Management Plan will also be very influential in defining the composition, role and function of a cooperative management body.

Responses:

Based on the response to the Draft GMP/EIS, there does appear to be considerable support for a cooperative management body that will enhance communication, coordination, and cooperation. The Seashore will continue to explore the questions of how to best organize such a body. The effort to create a cooperative management body for Fire Island National Seashore will require additional planning and revisions to the Seashore's legislation. The NPS anticipates that the cooperative effort to develop a Coastal Land Use and Shoreline Management Plan will also be very influential in defining the composition, role and function of a cooperative management body.

The NPS believes that a management partnership that functions more as an operating board may be more desirable than an advisory body. The management partnership would not function as a regulatory body. The management partnership could include, but would not be limited to, owners and managers including the NPS, Suffolk County Parks, New York State Parks, Recreation & Historic Preservation (NYS Parks), the municipalities, and representation from island property owners. The partnership would also consult with regulators.

The management partnership members would be grounded in common assumptions and objectives and a unifying plan or strategy for advancing the long term

protection of the natural resources of Fire Island and shared waters. The NPS would serve as convener and coordinator as well as a member and would provide leadership in pursuing the directions and strategies set by the partnership.

The NPS would continue to manage Fire Island National Seashore in accordance with all applicable laws and policies including the National Park System Organic Act and NPS Management Policies. Similarly, other participating management partners would be circumscribed by the relevant laws and policies specific to their agency, organization or institution.

Park Administration: *Balancing Resource Management Under Management Alternative 3*

Concerns: Commenters expressed concern that the implementation of Management Alternative 3 would result in significantly less management emphasis on protecting Fire Island's natural resources. They identify this as a failure to meet the legislative intent that has been interpreted as giving the management of natural resources primacy over other resource values.

Other commenters raised concerns that Management Alternative 3 would signal movement toward greater levels of development on Fire Island and would like to see the NPS prevent further development on the island.

Examples of Quotes:

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

"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."

"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."



In acknowledging the long history of human intervention and adaptation on Fire Island, the NPS hopes to work in partnership with the Fire Island communities to better manage the development footprint on Fire Island and its impacts.

Responses:

On p. 85, the underlying concept for Management Alternative 3 is outlined noting that “On Fire Island it has long been recognized that care must be taken to ensure that the “cultural footprint” on the barrier island does not overwhelm its natural qualities and character. 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.” Further, on p. 86 under “Natural Resources” it notes that the natural resources proposals and other relevant proposals identified under Elements Common to All Alternatives (see pp. 68–79) would be integrated into this alternative.

Management Alternative 3 acknowledges that Fire Island is a natural landscape with a significant cultural overlay and recognizes the strong connection between natural and cultural resources protection and human use. Historically, human use and development on Fire Island have reflected and responded to the natural qualities and character of the barrier island environment in the ways that it has been used, adapted to, and manipulated (see p. 85).

Under Management Alternative 3, efforts to understand and protect the Seashore’s natural resources remains a robust program and expands to encompass both marine and terrestrial resources. The proposed effort to understand and protect Fire Island’s cultural heritage would be additive and would not come at the expense of reducing protection for the underlying natural resources values that define the park. Much of the natural resource program as defined in Management Alternative 1—Current Management Practices is carried

on through Elements Common to All Action Alternatives under which additional natural resource program elements are proposed and are carried through to Management Alternative 3.

In acknowledging the long history of human intervention and adaptation on Fire Island, the NPS hopes to work in partnership with the Fire Island communities to better manage the development footprint on Fire Island and its impacts. This must be undertaken collaboratively, as the NPS will never have the same level of authority over local land use and development that state and local authorities possess. The tools that the NPS currently have at its disposal are antiquated. Under Elements Common to All Action Alternatives we call for the collaborative development of critical plans like the Coastal Land Use and Shoreline Management Plan and the Wastewater Management Plan that will enable all of the interests on Fire Island to identify the best way forward relative regulations and other tools that will ensure the resiliency and sustainability of the island’s resources and communities.

Park Administration: *Concurrent Planning Processes*

Concerns: Commenters expressed concerns that there were implementation plans being undertaken as the Draft GMP/EIS was being developed and reviewed. These efforts included the Wilderness Stewardship Plan (WSP), the White-tailed Deer Management Plan, and the Fire Island Wilderness Breach Management Plan. Commenters' concerns stemmed from the perception that the implementation plans were meant to tier from the adopted general management plan and that these efforts were inconsistent with that understanding of NPS policy and guidelines. Finally, in the case of the WSP, concerns were raised that NEPA compliance was undermined by preparing the draft WSP concurrent with the Draft GMP/EIS.

Examples of Quotes:

"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."

"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."

"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."

"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."

Native plant and animal species that are out of balance and are affecting other native plant and animal species and habitats would be managed by the NPS to ensure that such species do not crowd out or destroy species and habitats that support other species.

Response:

Deer management is a current management practice that was not clearly articulated in the Draft GMP/EIS. Current management of native plant and animal species on p.55 addresses managing native plant and animal species that include deer. Native plant and animal species that are out of balance and are affecting other native plant and animal species and habitats would be managed by the NPS to ensure that such species do not crowd out or destroy species and habitats that support other species. The development of a White-tailed Deer Management Plan concurrent with the completion of the Draft GMP/EIS enabled the Seashore to address an immediate issue in a manner that was consistent with the common elements outlined in the document.

Under the 1983 Wilderness Management Plan, compliance for breaches in the Fire Island Wilderness was defined and was the guiding document the NPS used to determine the need for an Fire Island Wilderness Breach Management Plan/ Environmental Impact Statement to be created. In the new Wilderness Stewardship Plan (WSP) associated with the Draft GMP, guidance for future breaches in the Fire Island Wilderness is discussed related to NEPA.

The NPS Wilderness Stewardship Program guided the Seashore to integrate the planning for the WSP as part of the Seashore's general management planning process to ensure that it was given full consideration. No alternatives were identified for the Fire Island Wilderness in the WSP and so the proposal for the Fire Island Wilderness was placed in the Elements Common to All Action Alternatives section and was evaluated for impacts in the context of each of the proposed alternatives. Similar to what was described above for the White-tailed Deer Management Plan and the Fire Island Wilderness Breach Management Plan, sufficient work had been completed on the Draft GMP/EIS to offer the fundamental guidance necessary to complete work on the Draft WSP.

Fire Island Wilderness: *Consistency with the Wilderness Act*

Concerns: Commenters equated the potential lack of direct access to failing to provide opportunities for solitude and primitive recreation, key goals of the Wilderness Act. The concerns were raised about the condition of the main trail and pre-existing spur trails through the Fire Island Wilderness area suggesting that it negatively affected their ability to safely obtain access to the wilderness area exposing them to hazards (dense vegetation and tick-borne illnesses). It was also noted that access from the west (walking in from Watch Hill) was not sufficiently maintained.

Another commenter expressed support for removal of non-native, invasive species in the Fire Island Wilderness area but was concerned that proactive efforts to restore native species would be contrary to the Wilderness Act.

Examples of Quotes:

“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.”

“The Burma Road trail is currently severely overgrown, as are a couple of spur trails that lead 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.”

“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.”

“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 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.”

Responses:

Established dune crossings, the Burma Trail, low areas in the dune line, deer trails, or breaks in the marsh vegetation along the bay provide access to wilderness. Trails beginning at trailheads and other points of access are developed to Class 1 Wilderness (single lane up to 12” wide, as per Federal U.S. Forest Service Trail Class standards) which minimizes impacts to overall wilderness character and natural resources. The Burma Trail will be minimally maintained by the Seashore at the western access point. Access to the Fire Island Wilderness includes a boardwalk trail from the east end and may take place from any point, not just the Burma Trail. The Seashore will encourage unconfined exploration and recreation, allowing visitors to experience the wilderness largely on its own terms. The access and circulation within the Fire Island Wilderness are consistent with wilderness character and promote the use of the unique landscape habitat of the Fire Island Wilderness.

In maintaining the natural wilderness quality, the Seashore may remove non-native species. On a case-by-case basis, these areas may have rehabilitation activities, including planting native vegetation that is consistent with the local vegetation and community habitats (NPS Policies 2006, 4.4). The removal of non-native invasive plants and the reintroduction of their native counterparts may have a longer-term positive effect on the natural quality of the wilderness. All rehabilitation projects will be fully evaluated using the Minimum Requirements Analysis process and will be documented utilizing a set of monitoring protocols (NPS Policies 2006, 6.3.5).

Fire Island Wilderness: *Wilderness Monitoring*

Concerns: Commenters raised concerns that the proposed baseline for monitoring wilderness character would be established as its current state and expressed a preference that the original 1980 state of the Fire Island Wilderness be used for that purpose. Another commenter wanted to see that the impacts of ORV use on the beach in front of the Fire Island Wilderness be considered in monitoring wilderness character.

Examples of Quotes:

“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. 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.”

“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).”

Responses:

Wilderness character can be described as the combination of biophysical, experiential, and symbolic ideals that distinguishes wilderness from other lands. Each wilderness area is unique in its qualities. The Seashore is responsible for defining what those wilderness character qualities are for the Fire Island Wilderness and how they will be monitored. The Seashore utilizes Keeping It Wild (Landres et al. 2008) and Keeping It Wild 2 (2015) as a framework to identify specific quantifiable indicators and measures that can be used to assess trends (See Appendix D, p.28 draft WSP). The Seashore created monitoring protocols in 2010 and a baseline inventory occurred in 2011. There is no existing quantitative or qualitative data that exists for the Fire Island Wilderness previous to this time.

One indicator already being measured as part of wilderness character monitoring is the use of ORV's adjacent to the Fire Island Wilderness on the open beach.



William Floyd Estate

Concerns: A commenter offered suggestions related to improving the entrance experience, site circulation, exhibiting relevant pieces, and the need to elevate the William Floyd Estate’s profile through outreach to schools, historical societies, and other institutions. Comments expressed that the scale and type of introduced recreational activities should be carefully weighed against protecting the natural and cultural values of the place. Concerns were also raised about the rehabilitation of the cultural landscape and the possibility that it may be too costly and may interfere with other resource values.

Examples of Quotes:

“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.”

“There should be more communication with schools and historic societies informing them of the historic treasures at the Home.”

“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.”

“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?”

Under this alternative, new opportunities for viewing wildlife may be created through improvements to the historic trail system and the introduction of wildlife observation points.

Responses:

Management Alternative B: Historical Park and Museum (the preferred alternative) speaks directly to the concerns. On pp. 105-106, the plan proposes the rehabilitation of existing visitor facilities to create an indoor orientation and program space. Access between the orientation facility and the Old Mastic House would continue to be via a combination of boardwalk and mowed pathway across the lawn to guide visitors and limit their exposure to ticks. The Seashore would continue to make use of the collections with exhibits at the William Floyd Estate, the Seashore and other appropriate locations. The planning priorities for the William Floyd Estate may be found on p. 95-96 and speak to the needs for outreach and collaborative stewardship to elevate the William Floyd Estate's profile and broaden its audience.

Under the preferred alternative, the proposed recreational use of the William Floyd Estate would include walking, hiking, birding, photography, and related activities would be encouraged (see p. 105). The emphasis would continue to be on passive recreation that would honor and protect the historic character and natural values of the William Floyd Estate. Under this alternative, new opportunities for viewing wildlife may be created through improvements to the historic trail system and the introduction of wildlife observation points. No negative impacts to natural or cultural resources were associated with these proposals.

The preferred alternative for the William Floyd Estate recommends that in the Lower Acreage, the existing cultural landscape features be retained and rehabilitated. It further provides for the creation of landscape vignettes to evoke different periods in the William Floyd Estate's history in support of interpretive objectives. These proposed actions would be undertaken consistent with the results of a Cultural Landscape Report and Treatment Plan that will provide the guidance necessary to consider feasibility, cost, and impacts.



Errata: Draft GMP/EIS

Changes and clarifications to the Draft GMP/EIS: This section contains those changes that should be made to the Draft GMP/EIS. Some of these changes are a result of public comments while others are editorial in nature. If text has a strikethrough the text, it is deleted from the text; if it is underlined, it is added text.

Throughout the document the Draft General Management Plan/ Environmental Impact Statement or Draft GMP/EIS will be referred to as the Abbreviated Final General Management Plan/ Environmental Impact Statement or Abbreviated Final GMP/EIS with a final release date of 2016.

INSIDE FRONT COVER

This draft General Management Plan/Environmental Impact Statement describes the resource conditions and visitor experience as they should exist at Fire Island National Seashore over the next 20 years. It presents three park-wide alternatives and two alternatives specific to the William Floyd Estate. One of which has been selected as the preferred option park-wide as well as one for the Floyd Estate. It also assesses the potential impacts of the alternatives on park resources, the visitor experience, park operations, and the surrounding area.

This document is available for public review for 90 days. The public review period will end 90 days after a Notice of Availability is published in the Federal Register. During the review period, the National Park Service will accept written and oral comments, which will be carefully reviewed and incorporated, as appropriate, in the final plan and final environmental impact statement.

You can submit comments via mail or online to the addresses below. Please note that names and addresses of people who comment become part of the public record. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available.

Please submit comments online to

<http://parkplanning.nps.gov/FHSGMP> or via mail to:
Superintendent
Fire Island National Seashore 120 Laurel Street
Patchogue, NY 11772

For further information, please contact the

Superintendent at:

Phone: (631) 687-4750

Fax: (631) 289-4898

Replace text with:

This Abbreviated Final GMP/EIS reports on the results of agency and public comments on the Draft GMP/EIS, including any changes that may have been made as a result of agency and public comment. The text has been revised in several cases to reflect additions or changes suggested by agencies, organizations or other commenters during review of the public draft, or to update text from the Draft GMP/EIS for completeness and accuracy. These changes are shown in the document as strikeouts for deletions and shaded gray for additions.

The Abbreviated Final GMP/EIS will be released for a 30-day no-action period. The availability of the Abbreviated Final GMP/EIS will be announced to agencies and the public and will be noticed in the Federal Register. No sooner than 30 days after the release of the Abbreviated Final GMP/EIS, the Northeast Regional Director may sign a Record of Decision selecting an alternative for implementation as the approved GMP for Fire Island National Seashore. The availability of the signed Record of Decision will be noticed in the Federal Register, after which the NPS would proceed to implement the approved GMP contingent on available funding. By virtue of recording this selection in a Record of Decision, this alternative will become the park's new General Management Plan.

PAGE VI

The Draft GMP/EIS is was made available for public review for 90 days. A Wilderness Management Plan was approved in 1983. As part of the ~~current~~ GMP planning process, proposals for the Fire Island Wilderness are were described in the Common to All 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 Draft GMP/EIS. The draft WSP that ~~appears~~ appeared in Appendix D ~~will undergo~~ underwent public review concurrently with the Draft GMP/EIS. During that time, the team ~~will solicit~~ solicited public comment and ~~hold public meetings that will be publicized in local media outlets~~ held public open houses during summer 2015. The NPS ~~planning team will review and evaluate~~ reviewed and evaluated all comments received on the Draft GMP/EIS. The results of the public and agency comments ~~will be~~ have been incorporated into a an Abbreviated Final GMP/EIS that will be made available to the public for a 30-day no-action period, after which a Record of Decision may be prepared to document the selection of an alternative as the approved GMP for the Seashore.

PAGE VI

Left column, 2nd bullet from the bottom:

- ~~Five~~ Eight federally listed threatened and endangered species have been identified;

PAGE IX

Left column, 2nd paragraph, last sentence:

A final Wilderness Stewardship Plan will be approved and released ~~concurrent with~~ after the Ffinal GMP/EIS.

PAGE XI

Left column, 4th paragraph under “Wilderness”:

Due to the removal of the incompatible features related to the Smith Point West Nature Trail and the loss of Old Inlet facilities resulting from Hurricane Sandy in 2012, these areas approximately one acre) ~~will be~~ were designated as Wilderness ~~upon publication of a notice in the Federal Register~~ when a notice was published in the Federal Register in October 2015.

Right column, first paragraph, delete and replace with:

~~The Seashore would also adhere to the tenets of the Tentative Federally Support~~

~~Plan (TFSP) as part of the Fire Island to Montauk Point Reformulation Plan (FIMP).~~

The Seashore would continue to collaborate with the US Army Corps of Engineers in the development of the Fire Island to Montauk Point Reformulation Plan (FIMP) drawing upon the tenets of the FIMP Tentative Federally Supported Plan as discussed on pages 58 and 59.

PAGE X

First column last paragraph, line four:

The plan would be consistent with and complementary to the final FIMP and draw upon the tenets of the Tentative Federally Supported Plan (TFSP) for FIMP and would to articulate a comprehensive strategy for protecting coastal resources while accommodating land use development within the coastal zone on both federal and non-federal lands within the Seashore.

PAGE XVII**HOW TO COMMENT ON THIS PLAN**

Comments on this draft GMP/EIS are welcome and may be submitted during the 60-day review and comment period, using one of the methods noted below:

- Online: <http://parkplanning.nps.gov/fiis>

We prefer that readers submit comments online through the park planning website identified above which incorporates the comments into the NPS Planning, Environment, and Public Comment (PEPC) system. An electronic public comment form is provided through this website.

- Mail: Fire Island National Seashore GMP
 — 15 State Street
 — Boston, MA 02109 Attn: Ellen Carlson
 — Fax: 617.223.5164
 — Attn: Fire Island GMP (Ellen Carlson)
- Hand Delivery: Comments may be dropped off at Seashore headquarters (120 Laurel Street, Patchogue, NY 11772) or at public meetings, which will be announced in the local media following the release of this plan.

Please note that the names and addresses of people who comment become part of the public record. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available. While you can ask us in your comment to withhold personal identifying information from public review, we cannot guarantee that we will be able to do so.

All comments on the draft GMP/EIS will be reviewed and considered. Substantive comments will be identified and responded to in a Comment Analysis Report that will appear in the final GMP/EIS.

PAGE 3

The following text is added at the end of the introductory text under “Purpose of and Need for the General Management Plan”:

In compliance with Section 7(a)(1) of the Threatened and Endangered Species Act, NPS would consult with the U.S. Fish and Wildlife Service to develop a Conservation Review Plan that would proactively define the consultation process and requirements for the various plans and activities undertaken by the park. The Conservation Review Plan would apply specifically to plans and actions identified in the general management plan but would also address the regular plans and actions that the Seashore generally undertakes that may require Section 7 consultation.

PAGE 3

A Wilderness Management Plan was approved in 1983. As part of the current GMP/EIS planning process, proposals for the Fire Island Wilderness are were 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/EIS and was made available for review concurrently with the Draft GMP/EIS. It will be published as a separate volume at the conclusion of this process. The WSP is being made available for review concurrent with the draft GMP/EIS and appears in Appendix D.

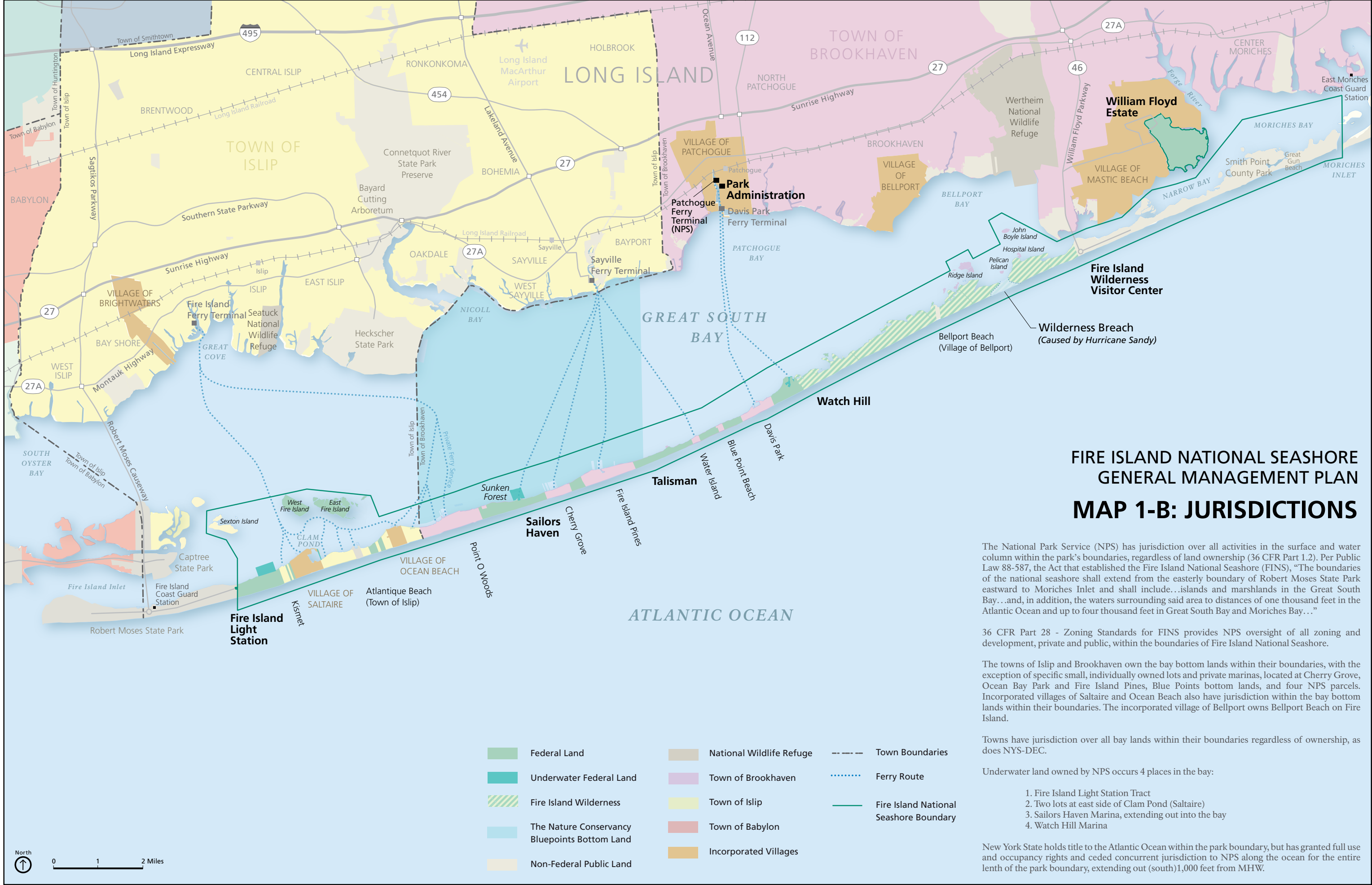
PAGE 5

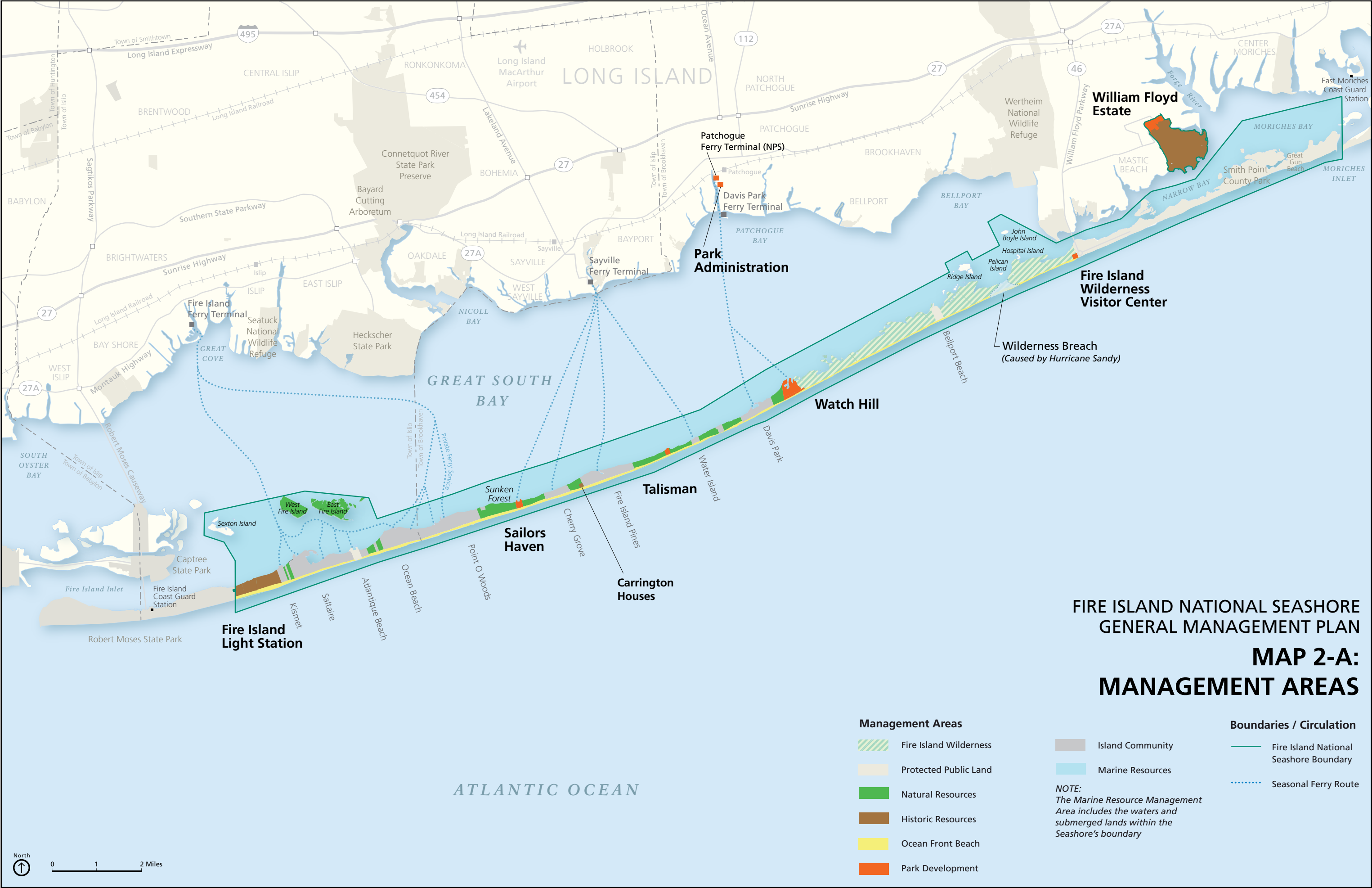
Map 1-B Jurisdictions has been updated to include reference to the Wilderness Breach.

PAGE 13

Second bullet, last sentence:

In the wake of Hurricane Sandy, the US Army Corps of Engineers received federal funding to implement FIMP, as described in the TFSP, has received federal funding to move forward. A one-time stabilization project, the Fire Island Inlet to Moriches Inlet Stabilization Project (FIMI) is being implemented as FIMP is finalized.





FIRE ISLAND NATIONAL SEASHORE
GENERAL MANAGEMENT PLAN
MAP 2-A:
MANAGEMENT AREAS

PAGE 17

2nd Paragraph Under “Cultural Resources—Description & Importance”:

Fire Island’s proximity to shipping lanes serving New York harbor made it critical to maritime navigation and communication. A lighthouse has stood on Fire Island since 1826. The lighthouse’s function, as a way for ships to communicate and navigate, led to the placement of related facilities, many using more advanced technologies. The existing Fire Island Light was built in 1858 at the western edge of Fire Island, but since that time littoral drift has continued to extend the western edge so that the present day lighthouse now sits nearly five miles east of the western border at Democrat Point. In 1868, the Western Union Telegraph Company began using the site when it built a signal tower and telegraph station immediately east of the lighthouse. Building yet again on the site’s prime location, the federal government expanded its maritime and communication presence by instituting a U.S. Naval Radio Compass Station in 1906, just east of the Light Station and the Western Union Fire Island Marine Station (which was abandoned in 1920 and destroyed by a hurricane in 1938). The period of significance for the Fire Island Light Station extends from 1825 to 1960.

PAGE 19

Under “Wilderness—Description & Importance”
Add after last paragraph:

In 2012, Superstorm Sandy created a breach in the eastern segment of the Fire Island Wilderness. The northern and southern boundaries of Fire Island Wilderness, as described above, extend across the breach east and west maintaining continuous wilderness. This unique feature has created marine wilderness where exchange of water occurs between ocean and bay. All regulations related to prohibited uses within wilderness applies within these waters. Guidance for the management of breaches in wilderness is found in the Seashore’s Wilderness Stewardship Plan.

PAGE 27

Left column, 2nd full paragraph:

The Tentative Federally Supported Plan (TFSP), accepted in 2011 by the NPS, the U.S. Fish and Wildlife Service (FWS), and the USACE, has been adopted by reference within the context of this draft GMP/EIS plan as basic guidance for shoreline management within Fire Island National Seashore. ~~Should the FIMP Reformulation Study be approved and adopted, its provisions would take precedence over the approved GMP.~~

First column, last paragraph, delete and replace:

~~The Tentative Federally Supported Plan (TFSP), accepted in 2011 by the NPS, the U.S. Fish and Wildlife Service (FWS), and the USACE, has been adopted by reference within the context of this draft GMP/EIS plan as basic guidance for shoreline management within Fire Island National Seashore. Should the FIMP Reformulation Study be approved and adopted, its provisions would take precedence over the approved GMP.~~

In 2011 the Tentative Federally Supported Plan (TFSP) was developed and agreed to by the NPS, the U.S. Fish and Wildlife Service (FWS), U.S. Geological Survey (USGS), and the U.S. Army Corps of Engineers (USACE) and put forward for public discussion with New York State and the general public. The tenets of the TFSP provide guiding principles for development of a “mutually acceptable” plan. In October of 2012 Hurricane Sandy made landfall on Fire Island and Long Island. In response to Hurricane Sandy, federal funds were provided to implement FIMP as outlined in the TFSP but with modifications due to the impacts of the hurricane. An emergency stabilization project for Fire Island (FIMI) was approved and is being implemented while FIMP is finalized. The FIMI project utilizes the modified TFSP as its foundation. In 2014 the Department of the Interior and the United States Army entered into a Memorandum of Understanding agreeing to continue to collaborate on the development of FIMP. The tenets of the TFSP will be drawn upon by the Seashore/NPS as it collaborates with USACE in the development of FIMP. If, and when a final mutually agreed to FIMP is adopted its provisions will be incorporated into the final approved GMP.

PAGE 43

Map 2-A Management Areas has been updated to include reference to the Wilderness Breach.

PAGE 54

Right column, under “Threatened & Endangered Species”

Threatened & Endangered Species Management Plan

As funds become available, the NPS would update the Seashore’s Threatened and Endangered Species Management Plan and include provisions to consider and address the potential effects of climate change and sea-level rise, predation, and other factors on T & E species.

PAGE 55

Left column, under Native Plant and Animal Species, 2nd paragraph under Managing Native Plant and Animal Species:

Native plant and animal species perceived as nuisances (such as biting insects, poison ivy, and raccoons) would be managed consistent with resource management and public safety objectives and based on guidance provided by existing Seashore management protocols, NPS Management Policies 2006, and associated Directors Orders. Native plant and animal species that are out of balance and are affecting other native plant and animal species and habitats would be managed by the NPS to ensure that such species do not crowd out or destroy species and habitats that support other native species; to that end the park has undertaken the development of a deer management plan.

Mosquito Surveillance & Management

The NPS would continue to engage in a regular program of mosquito surveillance based on the annual Mosquito Action Plan and Surveillance Protocols (Protocols). These would be updated annually in collaboration with county, state, and federal organizations, including Suffolk County Vector Control (SCVC), Suffolk County Department of Health Services, and the United States

Geological Survey (USGS) and would be consistent with an approved Mosquito Management Plan completed by Suffolk County.

The SCVC would continue to manage mosquitoes within Smith Point County Park and residential communities located within the boundaries of the Seashore on Fire Island. The SCVC operates its program within the Seashore under a Letter of Authorization from

the NPS. The SCVC would continue to be restricted from using any form of pesticides on the federal tracts of Fire Island and the William Floyd Estate as per management policies documented in the Protocols. In order to maintain and preserve the environment within the Seashore, NPS policy states that mosquito management interventions would be applied within the Seashore only if the presence of West Nile Virus (WNV) (and/or Eastern Equine Encephalitis (EEE)), in or near the park, is strong enough to suggest disease risk to humans and the risk of disease transmission would be substantially lowered by the intervention.

Under this alternative, the NPS would work collaboratively with Suffolk County Vector Control (SCVC) to revise the Mosquito Action Plan and Surveillance Protocols (Protocols) within the Seashore boundary consistent with the Seashore’s Mosquito Surveillance and Management Program. The revised protocols would enable the NPS and Suffolk County to implement proactive management strategies in areas of high use and high risk of exposure to reduce human health risk. A range of low-impact methods would be employed to minimize the effects on other Seashore resources. Intensive public education would also figure prominently in the strategy.

PAGE 58

Second column, last paragraph:

Under the no-action alternative, the Seashore would continue to follow draw upon the Tentative Federally Supported Plan...

PAGE 59

Second column, last paragraph:

It is expected that FIMP will address breach management throughout the 83-mile project area. Although the Tentative Federally Supported Plan (TFSP) identifies the following elements that pertain to breach management, the FIMP EIS will consider all alternatives for breach management:

It is expected that FIMP will consider all alternatives for breach management throughout the 83-mile project area. Until FIMP is finalized the following guidance pertaining to breach management will continue.

PAGE 60

Add text after section on “Fire Island Inlet to Montauk Point Reformulation Study (FIMP):

Fire Island Inlet to Moriches Inlet (FIMI)

On October 29, 2012, Hurricane Sandy made landfall on Long Island and affected extensive areas on Long Island, including substantial beach erosion on Fire Island. On Fire Island, dunes were extensively overwashed and two breaches formed as the storm made landfall. To address the shoreline erosion on Fire Island from Hurricane Sandy and to provide a level of storm damage protection to mainland developments, the Fire Island Inlet to Moriches Inlet (FIMI) project was proposed from Robert Moses State Park in the west to Smith Point County Park in the east.

The Fire Island Inlet to Moriches Inlet (FIMI) project is an expedited approach to complete a stabilization effort independent of the Fire Island to Montauk Point Reformulation Study (FIMP). FIMI is designed to provide for coastal storm risk management from coastal erosion and tidal inundation through construction of a beach berm and dune at various locations along Fire Island. The U.S. Army Corps of Engineers, State of New York and U.S. Department of Interior have developed a mutually acceptable one-time stabilization plan for Fire Island (a portion of the FIMP study area) to provide protection until implementation of the larger FIMP initiative.

PAGE 60

First column, second bullet:

- Breaches within the five major federal tracts ...

PAGE 62

Left column:

Beach Camping on the Beach in front of the Wilderness Area**PAGE 68**

Left column, 3rd and 4th bullets under Natural Resource Management

- Management of Native Plant and Animal Species (e.g., White-tailed Deer Management Plan)
- Mosquito and Tick Surveillance and Management

PAGE 73

First paragraph, first sentence:

The plan would be consistent with and complementary to the final FIMP and draw upon the tenets of the Tentative Federally Supported Plan (TFSP) for FIMP and to ~~would~~ articulate a comprehensive strategy for protecting coastal resources while addressing resilience in land-use development within the coastal zone on both federal and non-federal lands within the Seashore.

PAGE 76

Left column, 3rd paragraph under Water-Based Access

Moorings or No-Anchor Zones

The NPS may consider the institution of a formal mooring system or “no anchor zones” adjacent to federal facilities to protect the Seashore’s marine resources. These measures could be instituted in response to the recommendations of a Marine Resources Management Plan.

PAGE 79**Potential Wilderness Additions**

Because of existing facilities or uses located at Old Inlet and the Smith Point West Nature Trail, these areas were originally deemed incompatible with a Wilderness designation. Due to the removal of the incompatible features related to the Smith Point West Nature Trail and the loss of Old Inlet facilities resulting from Hurricane Sandy in 2012, these areas (approximately 1 acre) ~~will be~~ were designated as Wilderness ~~upon publication of a notice in the Federal Register when a notice was published in the Federal Register in October 2015.~~

Wilderness Use

Passive recreational activities such as hiking and sunbathing would continue, as would the collection of beach plums and blueberries. Hunting and ~~overnight~~ backcountry camping would continue to be allowed by permit. ~~The NPS would consider allowing horseback riding by permit in the Fire Island Wilderness.~~ The NPS would continue to work with native tribes to accommodate traditional uses in the wilderness, including ceremonial activities.

PAGE 83

Right column

Beach Camping on the Beach in front of the Wilderness Area

As in Alternative 1, beach camping on the beach in front of the Fire Island Wilderness Area would continue under the following conditions:

PAGE 86

► **NATIVE PLANT & ANIMAL SPECIES**

Mosquito Surveillance & Management

Under this alternative, the NPS would work collaboratively with Suffolk County Vector Control (SCVC) to revise the Mosquito Action Plan and Surveillance Protocols (Protocols) within the Seashore boundary consistent with the Seashore's Mosquito Surveillance and Management Program. The revised protocols would enable the NPS and Suffolk County to implement proactive management strategies in areas of high use and high risk of exposure to reduce human health risk. A range of low-impact methods would be employed to minimize the effects on other Seashore resources. Intensive public education would also figure prominently in the strategy.

Note: This text is relocated to and replaces text on Page 55.

PAGE 90

Right Column:

Beach Camping on the Beach in front of the Fire Island Wilderness Area

PAGE 111

1st paragraph under Ideas Considered but not Advanced for Further Analysis

Alternative 4 – Explore New Opportunities for Public Use

The planning team considered but rejected a fourth GMP alternative that would expand opportunities for public use on the island and encourage greater connections between the Seashore and related sites on Long Island. The proposal called for the expansion of existing facilities and the development of new ones on Fire Island and sought to increase visitation. Concerns about the additional development of the Seashore, the potential for a significant increase in visitation, and the effects of climate change and sea-level rise have resulted in the dismissal of this proposal.

PAGE 120

First box, line five:

The plan would be consistent with and complementary to the final FIMP and draw upon the tenets of the Tentative Federally Supported Plan (TFSP) for FIMP and to would articulate a comprehensive strategy for protecting coastal resources while addressing resilience in land-use development within the coastal zone on both federal and non-federal lands within the Seashore.

PAGE 121

TABLE 2-3: SUMMARY OF PLANNING NEEDS (PREFERRED ALTERNATIVE)

Note: Wastewater Management Plan—priority level indicated has been updated to “H”

Table 2-3, add text:

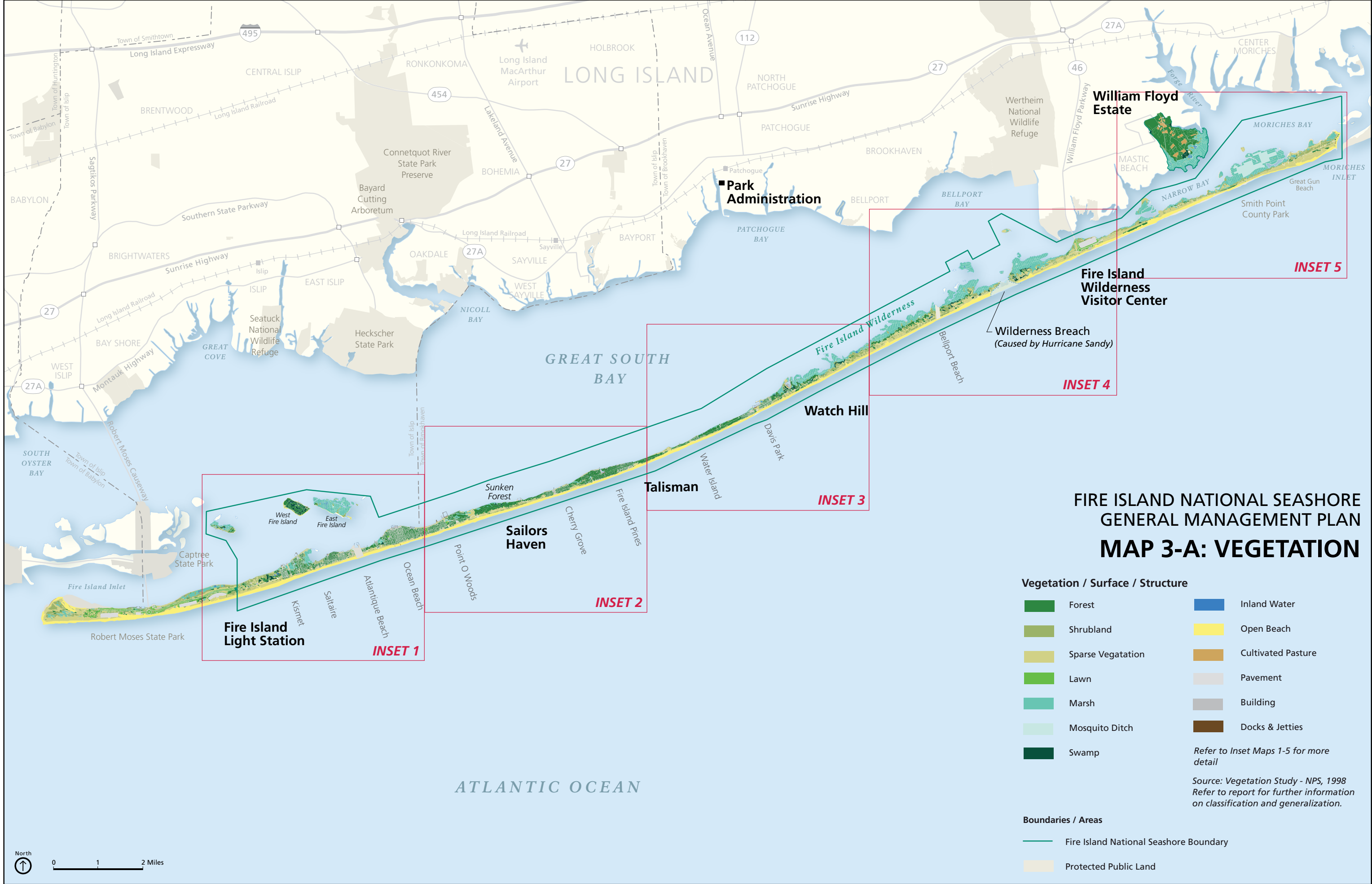
Threatened & Endangered (T&E) Species Management Plan	This plan would update the Seashore's T&E Species Management Plan and include provisions to consider and address the potential effects of climate change and sea-level rise, <u>predation, and other factors</u> on T&E species.	M
---	--	---

PAGE 133

Map 3-A Vegetation and Inset 4 have been updated to include reference to the Wilderness Breach.

PAGE 139

Map 3-B Submerged Aquatic Vegetation have been updated to include reference to the Wilderness Breach.





PAGE 144

Add this new table:

TABLE 3-5: NON-NATIVE INVASIVE ANIMAL SPECIES AT FIRE ISLAND NATIONAL SEASHORE (2016)	
Common name	Scientific name
Asian tiger mosquito	<i>Aedes albopictus</i>
Asian rock pool mosquito	<i>Aedes japonicus</i> , <i>Ochlerotatus japonicus</i>
domestic dog (feral)	<i>Canis lupus familiaris</i>
rock dove, rock pigeon	<i>Columba livia</i>
mute swan	<i>Cygnus olor</i>
domestic cat (feral)	<i>Felis catus</i>
house mouse	<i>Mus musculus</i>
Norway rat	<i>Rattus norvegicus</i>
common starling, European starling	<i>Sturnus vulgaris</i>

PAGE 144 –**Non Native Invasive Animals**

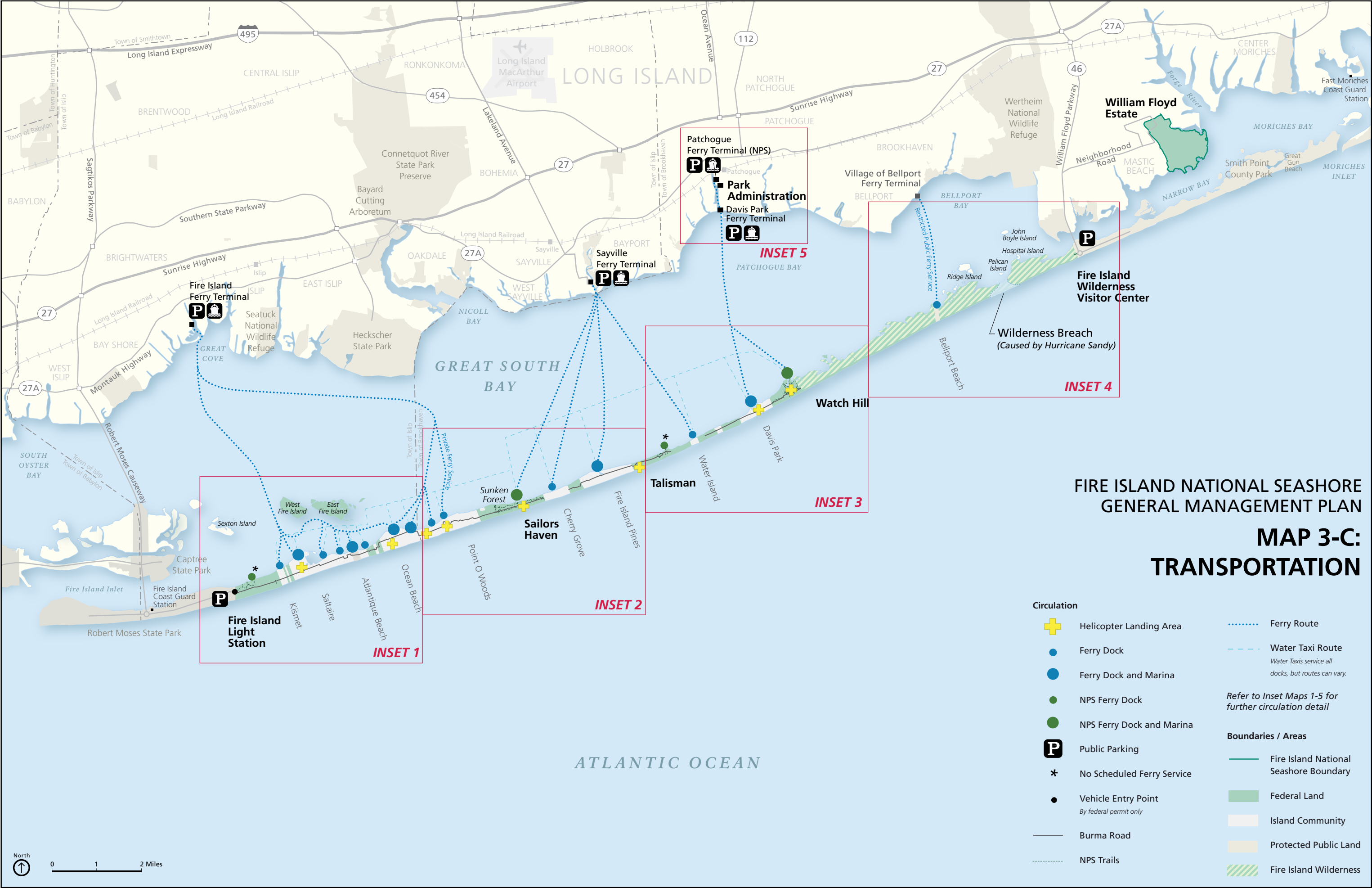
The Integrated Pest Management Program also recognizes several non-native invasive animal species common to the Seashore (Table 3-5). The Seashore's Mosquito Monitoring and Management Program discovered the presence of Asian tiger mosquito (*Aedes albopictus*) on Fire Island in the summer of 2012. The Seashore works closely with Suffolk County Vector Control in monitoring the human health risk associated with *A. albopictus* as well as the Asian rock pool mosquito (*Aedes japonicus*), due to its similar morphological characteristics (Taylor et al. 2015).

The two most common rodent pests within facilities throughout Fire Island are house mice (*Mus musculus*) and Norway rats (*Rattus norvegicus*). Rock pigeons (*Columba livia*) and European starlings (*Sturnus vulgaris*) are the two most common avian pests within facilities throughout Fire Island (Currie 2006). Other non-native invasive animal species include mute swans (*Cygnus olor*), feral cats (*Felis catus*) and feral dogs (*Canis lupus familiaris*).

PAGE 148

TABLE 3-5 3-6. RARE ANIMAL SPECIES KNOWN TO RELY ON HABITATS AT FIRE ISLAND NATIONAL SEASHORE

Community or Species Name	Federal Listing	NY State Listing	Global Rank	State Rank
Northern Right Whale (<i>Eubalaena glacialis</i>)	E	E	G1	SNA
Fin Whale (<i>Balaenoptera physalus</i>)	E	E	G3G4	S1
Humpback Whale (<i>Megaptera novaeangliae</i>)	E	E	G4	SNA
Great Egret (<i>Ardea alba</i>)			G5	S2
Snowy Egret (<i>Egretta thula</i>)			G5	S2S3
Northern Harrier (<i>Circus cyaneus</i>)		T	G5	S3B/ S3N
Bald Eagle (<i>Haliaeetus leucocephalus</i>)		<u>T</u>	<u>G5</u>	<u>S2S3B/S2N</u>
American Osprey (<i>Pandion haliaetus</i>)		SC	G5	S4B
Piping Plover (<i>Charadrius melodus</i>)	T	E	G3	S3
Roseate Tern (<i>Sterna dougallii</i>)	E	E	G4	S1
Common Tern (<i>Sterna hirundo</i>)		T	G5	S3
Least Tern (<i>Sterna antillarum</i>)		T	G4	S3
Black Skimmer (<i>Rynchops niger</i>)		SC	G5	S2
Short-eared Owl (<i>Asio flammeus</i>)		E	G5	S2
Seaside Sparrow (<i>Ammodramus maritimus</i>)		SC	G4	S2S3
Loggerhead (<i>Caretta caretta</i>)	T	T	G3	S1N
Green Turtle (<i>Chelonia mydas</i>)	T	T	G3	S1N
Hawksbill Sea Turtle (<i>Eretmochelys imbricata</i>)	E	E	G3	SNA
Kemp's Ridley (<i>Lepidochelys kempii</i>)	<u>E</u>	<u>E</u>	<u>G1</u>	<u>S1N</u>
Leatherback (<i>Demochelys coriacea</i>)	E	E	G2	S1N
Eastern Mud Turtle (<i>Kinosternon subrubrum</i>)		E	G5	S1
Shortnose Sturgeon (<i>Acipenser brevirostrum</i>)	E	<u>E</u>	<u>G3</u>	<u>S1</u>
Atlantic Sturgeon (<i>Acipenser oxyrinchus</i>)	<u>E</u>		<u>G3</u>	<u>S1</u>
Federal / NYS Listing E: endangered; T: threatened; R: rare; SC: species of concern (NYS only)				
Global / State Ranks G5: demonstrably secure; G4/S4: apparently secure; G3/S3: uncommon or local; G2/S2: imperiled due to rarity / vulnerable to extinction; G1/S1: critically imperiled / especially vulnerable to extinction; SNA: a visitor to the state but not a regular occupant, or a species that is predicted to occur in NY but that has not been found; N: indicated migratory status of a migratory species when it is not breeding in NY. Source: Trocki 2008 and New York Natural Heritage Program 2007				



FIRE ISLAND NATIONAL SEASHORE
GENERAL MANAGEMENT PLAN

**MAP 3-C:
TRANSPORTATION**

- Circulation**
- Helicopter Landing Area
 - Ferry Dock
 - Ferry Dock and Marina
 - NPS Ferry Dock
 - NPS Ferry Dock and Marina
 - Public Parking
 - No Scheduled Ferry Service
 - Vehicle Entry Point
By federal permit only
 - Burma Road
 - NPS Trails
 - Ferry Route
 - Water Taxi Route
Water Taxis service all docks, but routes can vary.
- Refer to Inset Maps 1-5 for further circulation detail*
- Boundaries / Areas**
- Fire Island National Seashore Boundary
 - Federal Land
 - Island Community
 - Protected Public Land
 - Fire Island Wilderness

PAGE 155

Map 3-C Transportation and Inset 4 have been updated to include reference to the Wilderness Breach.

PAGE 171

Map 3-D Visitor Facilities -- Existing Conditions has been updated to include reference to the Wilderness Breach.

PAGE 177

TABLE 3-6 3-7: SUMMARY OF POPULATION CHARACTERISTICS AND TRENDS, FIRE ISLAND, NY*

PAGE 178

TABLE 3-7 3-8: SUMMARY OF HOUSING, FIRE ISLAND, NY*

PAGE 180

TABLE 3-8 3-9: SUMMARY OF ECONOMY, FIRE ISLAND, NY*

PAGE 185

Map 3-E Operations & Maintenance Facilities—Existing Conditions has been updated to include reference to the Wilderness Breach.

PAGE 192

Left column, 2nd paragraph under Coastal Processes:

In accordance with the federal Coastal Zone Management Act of 1972, as amended, New York State passed the Coastal Erosion Hazard Act (CEHA) (Article 34 of NYS Environmental Conservation Law) in 1981. At Fire Island, CEHA is administered by the New York State Department of Environmental Conservation (NYS DEC) in the town of Islip, and separately by the villages of Saltaire and Ocean Beach, and by the town of Brookhaven, after their local codes (Section 85-379) were approved by NYS DEC. This state law regulates activities in areas designated as coastal erosion hazard areas including construction, modification, restoration, or placement of a structure. Changes in land conditions such as grading, excavation, and dredging also are regulated under CEHA. The CEHA boundaries encompass the entire shoreline of New York State. Regulations associated with CEHA have been implemented at Fire Island since 2001.

PAGE 235

Left column, add a bullet:

- Marine Mammal Protection Act of 1972, as amended

PAGE 236

Left column, omit 7th bullet:

- ~~developing and implementing a deer and vegetation management plan~~

PAGE 237

Left column, omit 3rd paragraph

A component of the deer and vegetation management plan would be to identify and protect special-status plants from deer herbivory, particularly the seabeach amaranth and seabeach knotweed. Seashore staff would continue to monitor existing plant populations, search for new populations, and protect these plants from deer herbivory by installing exclosure screening around plant populations or protective netting over individual plants.

PAGE 289

Right column, 1st paragraph:

Life-guarded beaches remain at Sailors Haven and Watch Hill, though there would no longer be lifeguards posted at Talisman. A water trail would be established on the bay side of Fire Island that would offer a guide or brochure, and occasional guided experiences offered by Seashore staff. Guided canoe trips would continue to be offered from Watch Hill. As in Alternative 1, beach camping on the beach in front of the Fire Island Wilderness would be permitted so that individuals seeking a backcountry camping permit for the Wilderness could choose to camp overnight on the beach or within the Wilderness Area. The number of permits and the size of the groups would be consistent with current practices and would not have an impact on the visitor experience.

PAGE 325

~~Justin McCarthy~~ Jeff DeJarnette, Point O' Woods

PAGE 458 – ADD TEXT

Currie, William E. November 2006. Integrated Pest Management Plan for Fire Island National Seashore. Natural Resources Report NPS/NER/NRR-2006/012. National Park Service. Boston, MA.

Errata: Draft Wilderness Stewardship Plan

Changes and Clarifications to the Draft Wilderness Stewardship Plan: This section contains those changes that should be made to the Draft Wilderness Stewardship Plan. Some of these changes are a result of public comments while others are editorial in nature. If text has a strikethrough the text, it is deleted from the text; if it is underlined, it is added text.

COMMON CHANGES THROUGHOUT WHERE APPROPRIATE

- “Wilderness” to “Fire Island Wilderness”
- “Atlantic Ocean Beach” to “Great South Beach”
- “FIIS” to “Fire Island National Seashore” or “Seashore”
- “Fire Island Wilderness Visitor Center” and “Smith Pt Visitor Center” to “Wilderness Visitor Center”
- The Superintendent’s Compendium has been added to sections to clarify where any future changes to the permitted campers may be found.
- The addition of “Keeping It Wild 2 (Landres et al 2015)” is cited throughout the document to update the original citation of Keeping It Wild (Landres et al 2008).

PAGE D-415

Introduction—remove text:

Following the removal of previous incompatible uses, 17 additional acres of land were designated wilderness in 1999 under a Federal Register Notice. Since 1999 there remained approximately one acre of potential wilderness additions within Fire Island National Seashore. In 20145 this one acre was designated as wilderness through a Federal Register notice. (See Section VI. C. for a brief description of the location and management intentions for these Wilderness additions.)

PAGE D-416

IV. WILDERNESS/BACKCOUNTRY USE

Paragraphs remained the same but moved to describe documents in sequential order.

PAGE D-416

BACKCOUNTRY/WILDERNESS DESCRIPTION

remove text

B. Potential Wilderness Additions

Following the 1980 wilderness study, a recommendation was forwarded to the Congress by the President that identified some lands within the Seashore as “potential” wilderness for future designation when the nonconforming use has been removed or eliminated. If authorized by Congress, potential wilderness areas will become designated wilderness upon the Department of Interior Secretary’s determination and publication in the Federal Register.

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.

See Section VI. C. for a brief description of the location and management intentions for these potential wilderness additions.

PAGE D-416

BACKCOUNTRY/WILDERNESS DESCRIPTION

Eastern Segment

add text:

Due to the dynamic nature of the shifting dunes, salt marshes, and barrier island shorelines, both the southern and northern boundaries are subject to frequent fluctuation. Where there is an overwash, break in the dunes, breach, etc., the Fire Island Wilderness will be managed as if the boundary extended to the toe of the dunes on either side of the break. For a more precise description of the Fire Island Wilderness boundary, please refer to the detailed boundary map in Appendix C.

In 2012, Superstorm Sandy created a breach in the eastern segment of the Fire Island Wilderness. The northern and southern boundaries of Fire Island Wilderness, as described above, extend across the breach east and west maintaining continuous wilderness. This unique feature has created marine wilderness where exchange of water occurs between ocean and bay. All regulations related to prohibited uses within wilderness applies within these waters.

PAGE D-418

IV. WILDERNESS/BACKCOUNTRY USE

B. Day Use

remove text:

Some of the primary uses of the Fire Island Wilderness include hiking and sunbathing. Horseback riding may be considered in the future by permit, but will need to be evaluated and monitored for resource impacts. Collecting of specified quantities of beach plums and blueberries occurs and is allowed throughout the park by Superintendent's Compendium designation, including within the Fire Island Wilderness. 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.

PAGE D-421

V. WILDERNESS CHARACTER

add text:

Opportunities for Solitude or Primitive and Unconfined Recreation: Wilderness provides outstanding opportunities for remoteness from sights and sounds of people and modified areas, for self-reliant recreation, and freedom from restrictions on visitor behavior.

Other Features of Value : Wilderness may contain ecological, geological, or other features of scientific, educational, scenic or historical value.

PAGE D-423

V. WILDERNESS CHARACTER

remove text

Cultural Resources

Cultural resources are not currently included in the four primary qualities of wilderness character, yet cultural resources and wilderness are indisputably related. There is a significant history of human use in this area and other wildernesses prior to designation, which may have produced archeological sites, historic structures and artifacts, cultural landscapes and associated features, objects, and traditional cultural properties that contribute to our appreciation of wilderness. Cultural resources are an integral part of wilderness and can contribute to wilderness character.

PAGES D-424 — D-430

Correction of outlined lettering in "VI. Wilderness Management" with the removal of "C. Potential Wilderness Additions"

PAGE D-424

add text

Other Features of Value

This fifth quality captures important elements or "features" of a particular wilderness that are not covered by the other four qualities. The intent of this quality is to include features that significantly contribute to the setting of a wilderness, and could include archaeological, historical, or paleontological features. The types of features that would be preserved under this fifth quality may or may not occur within a wilderness thereby making each wilderness unique from one another.

The 1980 Fire Island Wilderness Study documented several areas of cultural and historic interest that either currently or formerly existed in the area, such as a whaling station that operated at Whalehouse Point during the late 17th and 18th centuries, two lifesaving stations dating from the mid-1800's, and several beach cottages. An early fishing village and eventually a small summer community were developed at Long Cove in the late 19th century. Any culturally significant resources that are discovered will be preserved and protected, and Fire Island National Seashore will continue to work with native tribes to accommodate traditional uses, including but not limited to ceremonial practices and collecting.

PAGE D-427**I. H. Wildlife and Vegetation Management**

Fire Island National Seashore has developed a Mosquito Action Plan and Surveillance Protocols that should be referred to for actions affecting mosquito management. The Seashore will continue to monitor mosquitoes and allow existing mosquito ditches to naturally recover, as per the recommendations of research conducted in 2009.

Fire Island National Seashore has developed a White-tailed Deer and Vegetation Management Plan that provides guidance if it is necessary to control the growing population of white-tailed deer, which may be affecting native vegetation.

Under the Seashore's Piping Plover Threatened and Endangered Species Monitoring and Management program, symbolic fencing and predator exclosures are used to protect the federally threatened piping plover and its nesting and foraging habitat. Due to the decreased anthropogenic disturbances to plovers nesting in or adjacent to the Fire Island Wilderness, the number of plovers nesting in these areas is significantly greater than in other areas of the island. Preservation of threatened and endangered species greatly increases the natural quality of wilderness character.

PAGE D-425**VI. WILDERNESS MANAGEMENT**

remove text:

C. Potential Wilderness Additions

Two potential wilderness additions totaling one acre within the Fire Island Wilderness (at Old Inlet and Smith Point) after the 17-acre addition in 1999. This one acre was managed by the Seashore so as not to preclude their official designation as wilderness.

The existing structures at Old Inlet and the boardwalk at Smith Pt. were lost during Super Storm Sandy in 2012, and will not be replaced. This one acre potential wilderness at Old Inlet and Smith Point was added to the designated wilderness through notification in the Federal Register by the Secretary of the Interior in 2015, completing the 1,380 acres as stated in the 1980 legislation.

Old Inlet

The Old Inlet facilities (dock, boardwalk, dune crossing, and dehydrating toilet) were destroyed during Superstorm Sandy in November 2012 and will not be reconstructed. No structures currently exist that preclude wilderness designation.

Smith Point West Natural Trail

The Smith Point West Nature trail consists of a wooden elevated boardwalk. This trail originates from the Wilderness Visitor Center at the eastern wilderness boundary and provides access to three different habitats (swale, dune, and maritime forest). Portions of the trail near the bay were destroyed by ice and were removed in 2000. The Smith Point trail allows universal accessibility and offers visitors the opportunity to experience various habitats and a changing dune environment to which they might not otherwise have access. The only other remaining structures at Smith Point are three concrete pads.

PAGE D-425**B. Use of the Minimum Requirements Analysis**

add text:

When determining minimum requirements, the potential disruption of wilderness character and resources will be considered before—and given more significance than—economic efficiency and convenience. If a compromise of wilderness resources or character is unavoidable, only those actions that preserve wilderness character and/or have localized, short-term adverse impacts will be acceptable (2006 NPS Management Policies 6.3.5). If an action, project, or activity is implemented related to any topics discussed below, a minimum requirement analysis will be conducted.

PAGE D-426**E: F Motorized and Mechanical Use**

The use of motor vehicles and mechanical equipment (which includes motorized and mechanical vessels in the marine waters of the wilderness) by the public will not be permitted. Use of motorized vehicles and vessels and mechanical equipment by federal, local, and state agencies will not be permitted except in emergencies and when there is no other viable alternative. Emergencies may include evacuating severely sick and injured visitors (when the seriousness of the condition precludes the use of a litter), controlling wild or structural fires, or evacuating people during severe storms when travel on the beach is not possible. Emergency use will be approved by the Superintendent of Fire Island National Seashore or his or her official designee. Vehicle use by official vehicles and permit holders is allowed on the Great South Beach adjacent to the Fire Island Wilderness within current regulations of the Seashore as outlined in 36 CFR 7.20 and any future changes in driving regulations.

PAGE D-439**Appendix D. Monitoring Trends in Wilderness Character of the Fire Island Wilderness**

add text:

An interagency Wilderness Character Monitoring Team representing the Bureau of Land Management, Fish and Wildlife Service, National Park Service, U.S. Forest Service, and U.S. Geological Survey created an interagency strategy to monitor trends in wilderness character across the National Wilderness Preservation System called Keeping It Wild (Landres et al. 2008) and Keeping It Wild 2 (Landres et al 2015). This framework defines the five qualities of wilderness character using language directly from the Wilderness Act and identifies specific monitoring questions and quantifiable indicators and measures that can be used to assess trends. These are subject to revision, as measures and protocols may be revised, added, or removed.

PAGE D-440**Indicators and Measures**

add text:

A wilderness character monitoring protocol was developed by Seashore staff in 2011, utilizing the interagency guidance in Landres et al (2008). For each quality of wilderness character there are monitoring questions, indicators, and measures. Each indicator is listed below, followed by a description of the indicator, the measures selected, and protocols describing how the data will be collected. The data collected the first year will serve as a baseline assessment, and although measures may be compiled annually, trends in wilderness character will be reported every five years (Landres et al 2015). The measures and protocols are subject to change as staff obtain new information or data, or identify measures or protocols that more accurately reflect change in wilderness character.

PAGE 473

Add acronym:

FIMI – Fire Island Inlet to Moriches Inlet Stabilization Project

APPENDIX A: Agency & Organization Comments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

*Received
September 8, 2015
elc*

SEP - 3 2015

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

Dear Ms. Carlson:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the Fire Island National Seashore General Management Plan (CEQ # 20150170) in accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act.

Fire Island National Seashore (the Seashore) is a unit of the National Park System located along the south shore of Long Island in Suffolk County, New York. The Seashore comprises two separate and distinct areas, separated by the Great South Bay:

- The barrier island, consisting of 19,580 acres of upland, tidal, and submerged lands along a 26-mile stretch of the 32-mile island. This includes 1,400 acres of federally designated wilderness, an extensive dune system, maritime forests, isolated beaches, and the Fire Island Lighthouse.
- The William Floyd Estate (the Estate) on the south shore of Long Island. The 613-acre Estate is composed of 27 buildings, structures, and major landscape features.

The National Park Service (NPS) is proposing to implement a General Management Plan (GMP) for the Seashore. The GMP is a comprehensive document that defines the park's purpose and management direction and provides guidance for all subsequent planning and management decisions over the next 15 to 25 years. The GMP addresses issues related to climate change and sea-level rise, land use and development, shoreline management, and the needs for public access and recreational use that are affecting the Seashore's resource management practices.

NPS has selected Management Alternative 3, in combination with Management Alternative B as described for the William Floyd Estate, as the preferred alternative for the GMP. Under Management Alternative 3 for the barrier island, existing infrastructure would be retained and, over time, improved and/or reoriented to be greener, more efficient, and better adapted to the coastal environment. Any new development would be limited to existing visitor use areas and undertaken only after appropriate climate change and sea-level rise assessments. The Seashore would work to restore the Sunken Forest and other maritime forests on Fire Island, improve water quality through the development and implementation of a wastewater management plan,

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and engage in more intensive management of non-native invasive species. Specific activities include redesign of the Sailors Haven marina to minimize the erosion that has been undermining the Sunken Forest and rehabilitation of the Wilderness Visitor Center to improve accessibility.

Under Management Alternative B for the William Floyd Estate, NPS would correct structural issues at the main structure of the park, Old Mastic House, and remove the orientation exhibit and sales area. The visitor center and selected structures and landscape features (e.g., garden, portions of the orchard) within the historic core would be rehabilitated. The NPS would prepare a Cultural Landscape Report (CLR) and Treatment Plan for the Estate, which will govern rehabilitation of existing cultural landscape feature and the creation of new landscape vignettes (e.g., cultivated fields) to evoke different periods in the Estate's history. Existing roads and trails will be rehabilitated and the existing curatorial building will be expanded by 1000 ft² to allow the NPS to consolidate maintenance operations within a single structure at the Estate.

Based on our review and in accordance with EPA policy, we have rated this draft EIS as EC-2, indicating that the draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment. NPS should provide in the final EIS supplemental information on planned restoration, rehabilitation, and construction projects at the Seashore that includes, at a minimum:

- Identification of specific locations where activities will occur,
- Descriptions of natural resources at locations potentially adversely impacted by the activities,
- Best management practices that will be used to avoid, or mitigation measures to address, adverse impacts of activities,
- Descriptions of methods, materials, and equipment that will be used, and
- Construction diagrams, landscape plans, or other visual representations of planned projects.

The GMP provides direction and guidance for park planning and management decisions over a long period of time, 15 to 25 years. We understand that specifics for projects may not be available at this time, but we would expect NPS to prepare supplemental NEPA documents as each action moves forward. These documents should include the impacts of construction, including an analysis of air emissions. Thank you for the opportunity to comment on this project. If you have any questions, please contact Shane Nelson at (212) 637-3130.

Sincerely,



Judy-Ann Mitchell, Chief
Sustainability and Multimedia Programs Branch



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
55 Great Republic Drive
Gloucester, MA 01930-2276

RECEIVED

2014

NOV 17 2014

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

RE: Draft General Management Plan/Environmental Impact Statement for Fire Island National Seashore

Dear Mr. Soller:

We are responding to your office's October 22, 2014 letter requesting comments on the draft General Management Plan/Environmental Impact Statement (GMP/EIS) for Fire Island National Seashore located along the southern portion of Long Island, New York. Thank you for giving us the opportunity to review the draft and provide comments.

After reviewing your draft GMP/EIS, we recommend you include additional information on species listed by us under the Endangered Species Act (ESA), as well as further analyses of the potential direct and indirect effects of the proposed project on these ESA-listed species.

The list of federally threatened or endangered species that may be present within the Seashore's boundaries is missing two species: Kemp's ridley sea turtles and Atlantic sturgeon. In addition, while it is true that hawksbill sea turtles have been found as far north as Massachusetts (usually after storms/hurricanes), we do not generally consider them to be present in action areas north of 30 degrees North latitude for the purposes of ESA Section 7 consultation.

The following is a complete list of the ESA-listed species that may be present within or adjacent to the Fire Island National Seashore boundaries:

North Atlantic right whales (*Eubalaena glacialis*)
Fin whales (*Balaenoptera physalus*)
Humpback whales (*Megaptera novaeangliae*)
Kemp's ridley sea turtles (*Lepidochelys kempi*)
Green sea turtles (*Chelonia mydas*)
Leatherback sea turtles (*Dermochelys coriacea*)
Loggerhead sea turtles (*Caretta caretta*): Northwest Atlantic Ocean DPS
Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*): Gulf of Maine, New York Bight, Chesapeake Bay, South Atlantic and Carolina Distinct Population Segments (DPSs)



Specific comments on various pages of the GMP/EIS are listed below:

Page 3: "Five federally listed threatened or endangered species have been identified" should be modified to reflect that there are eight.

Page 53: Threatened and Endangered Species – no mention is made of any of the marine species.

Page 64: Under "Navigation," the document mentions that aids to navigation and navigation channels will be maintained by NPS at Sailor's Haven, Watch Hill, and Talisman; and that Moriches and Fire Island Inlets would continue to be dredged. Will these activities continue to be done on separate permits issued through NPS and ACOE, and continue to go through separate ESA Section 7 consultation, or will these actions be considered as part of this GMP? That should be clarified throughout this document.

Pages 131-132: There is no mention of sea turtles or Atlantic sturgeon in this section. Below is some information on these ESA-listed species that may be useful.

Sea Turtles

Four species of federally threatened or endangered sea turtles under our jurisdiction may be found seasonally in the coastal waters of New York: federally threatened Northwest Atlantic Ocean distinct population segment (DPS) of loggerhead (*Caretta caretta*), and the federally endangered Kemp's ridley (*Lepidochelys kempi*), green (*Chelonia mydas*) and leatherback (*Dermochelys coriacea*) sea turtles, although the latter species is found in deeper, more offshore waters and as such, is less likely to occur in the action area (i.e., depths of 8-11 feet). In general, listed sea turtles are seasonally distributed in coastal U.S. Atlantic waters, migrating to and from habitats extending from Florida to New England, with overwintering concentrations in southern waters. As water temperatures rise in the spring, these turtles begin to migrate northward. As temperatures decline rapidly in the fall, turtles in northern waters begin their southward migration. Sea turtles are expected to be in the waters of Long Island in warmer months, typically when water temperatures are at least 15°C. This typically coincides with the months of May through November, with the highest concentration of sea turtles present from June to October (Morreale 1999; Morreale 2003; Morreale and Standora 2005; Shoop and Kenney 1992).

Atlantic Sturgeon

Atlantic sturgeon (*Acipenser oxyrinchus*) occur in estuarine and marine waters along the U.S. Atlantic coast and may be present in the Great South Bay and in the Atlantic Ocean. The New York Bight, Chesapeake Bay, South Atlantic and Carolina DPSs of Atlantic sturgeon are endangered; the Gulf of Maine DPS is threatened. The range of Atlantic sturgeon from all five DPSs extends from Labrador Inlet, Labrador, Canada to Cape Canaveral, FL. After emigration from the natal estuary, subadult and adult Atlantic sturgeon forage within the marine environment, typically in waters less than 50 meters in depth, using coastal bays, sounds, and ocean waters (Vladykov and Greeley 1963; Murawski and Pacheco 1977; Dovel and Berggren 1983; Smith 1985; Collins and Smith 1997; Welsh *et al.* 2002; Savoy and Pacileo 2003; Stein *et al.* 2004; Laney *et al.* 2007; Dunton *et al.* 2010; Erickson *et al.* 2011; Wirgin and King 2011; D.

Fox, pers. comm.; T. Savoy, pers. comm.). Therefore, adult and subadult Atlantic sturgeon from any of five DPSs could occur in the Seashore; however, as Atlantic sturgeon spawn in freshwater portions of large rivers and early life stages are not tolerant of salinity, no eggs, larvae or juvenile Atlantic sturgeon are likely to occur in Great South Bay or the Atlantic Ocean.

Page 142: Reptiles and Amphibians

Please note that it is the Northwest Atlantic DPS of loggerhead sea turtles that are listed as threatened under the ESA.

Page 145: Special Status Species

We would recommend adding Kemp's ridley sea turtles and Atlantic sturgeon to Table 3-5. We recognize that hawksbill sea turtles are listed as a visitor to the area, but not a regular occupant. As stated above, we would not consider hawksbill sea turtles to be present in the action area for the purposes of ESA Section 7 review.

Page 191: Impacts Related to Transportation and Access Actions

This section states that: "Comprehensive dredge and shoreline management plans would be developed for Fire Island to help offset these impacts by placing dredged sediments along the shoreline..." If the comprehensive dredge and shoreline management plans will be part of this action, in order to do a section 7 consultation on this action, we will need additional information and detail on any dredging activities, including how, when, where, and how often dredging will be done as well as where and when dredged sediment would be used as beach nourishment.

Page 211: Impacts Related to Transportation and Access Actions (Impacts on Water Resources)

This section notes that elimination of the Sailors Haven Marine could increase the number of boats that moor offshore, but the possible effects of the changes in moorings on ESA-listed species (e.g., increases in vessel strikes) are not discussed in the document. In addition, the effects of any maintenance or construction of docks or other in-water structures would need to be analyzed.

Page 243: Impacts Related to Transportation and Access Actions (Impacts Common to All Alternatives-Special Status Species)

This section considers the effects of "motorcraft noise," but it does not consider the potential effects of vessel strikes on sea turtles, whales, or sturgeon.

Page 343-344: Notifications and Formal Consultation

While ongoing consultation with US Fish and Wildlife Service is mentioned, there is no mention of consultation with NMFS. The last sentence of this section says: "The NPS will continue consultation with USFWS and NYS DEC as site-specific plans are advanced to implement the general management plan." We would recommend consulting with NMFS as well, as there are eight ESA-listed species under our jurisdiction that may be affected by the implementation of the general management plan.

Page 345: Species of Special Concern

Again, Section 7 consultation with USEWS is mentioned, but there is no mention of NMFS consultation.

Conclusion

As the proposed action has the potential to effect ESA-listed species of whales, sea turtles, and Atlantic sturgeon, we suggest considering further the effects of the proposed action on these species, as noted above. As you may know, any discretionary federal action, such as the approval or funding of a project by a Federal agency, that may affect a listed species must undergo consultation pursuant to Section 7 of the ESA. The National Park Service and/or the U.S. Army Corps of Engineers will be responsible for determining whether the proposed action is likely to affect listed species when the permit for work is issued. When project plans are complete, either NPS or USACE should submit a request for consultation, including a determination and analysis of effects, to the attention of the Section 7 Coordinator, NMFS, Greater Atlantic Fisheries Regional Office, Protected Resources Division, 55 Great Republic Drive, Gloucester, MA 01930. After reviewing this information, NMFS would then be able to conduct a consultation under section 7 of the ESA. Should you have any questions about this correspondence, please contact Jennifer Goebel at 978-281-9373 or by email (jennifer.goebel@noaa.gov).

Magnuson-Stevens Act

NMFS Habitat Conservation Division (HCD) is responsible for overseeing programs related to Essential Fish Habitat (EFH) designated under the Magnuson-Stevens Fishery Conservation and Management Act and other NOAA trust resources under the Fish and Wildlife Coordination Act. Further EFH consultation by the federal action agency will be required as part of the Federal permit process for any work proposed in water (below Mean High Water). For a listing of EFH and further information, please go to our website at: <http://www.nero.noaa.gov/habitat>. If you wish to discuss this further, please call Melissa Alvarez at 732-872-3116 or email melissa.alvarez@noaa.gov.

Sincerely,



for Kimberly Damon-Randall
Assistant Regional Administrator
for Protected Resources

EC: Alvarez, NMFS/GARFO/HCD
Goebel, NMFS/GARFO/PRD

File Code: Section 7/Nonfisheries/NPS/2014/TechnicalAssistance/NPS Fire Island Draft GMP/EIS Comments

References

- Collins, M. R. and T. I. J. Smith. 1997. Distribution of shortnose and Atlantic sturgeons in South Carolina. *North American Journal of Fisheries Management* 17: 995-1000.
- Dovel, W. L. and T. J. Berggren. 1983. Atlantic sturgeon of the Hudson River estuary, New York. *New York Fish and Game Journal* 30: 140-172.
- Dunton, K., A. Jordaan, K.A. McKown, D.O. Conover, and M.G. Fisk. 2010. Abundance and distribution of Atlantic sturgeon (*Acipenser oxyrinchus*) within the Northwest Atlantic Ocean, determined from five fishery-independent surveys. *Fish. Bull.* 108(4): 450-465.
- Erickson *et al.* 2011. Use of pop-up satellite archival tags to identify oceanic-migratory patterns for adult Atlantic Sturgeon, *Acipenser oxyrinchus oxyrinchus* Mitchell, 1815. *J. Appl. Ichthyol.* 27: 356-365.
- Laney, R.W., J.E. Hightower, B.R. Versak, M.F. Mangold, W.W. Cole Jr., and S.E. Winslow. 2007. Distribution, Habitat Use, and Size of Atlantic Sturgeon Captured during Cooperative Winter Tagging Cruises, 1988-2006. *American Fisheries Society Symposium* 56: 000-000.
- Morreale, S.J. 1999. Oceanic migrations of sea turtles. PhD Thesis. Cornell University.
- Morreale, S.J. 2003. Assessing health, status, and trends in Northeastern sea turtle populations. Interim report: Sept. 2002-Nov. 2003.
- Morreale, S.J. and E.A. Standora. 2005. Western North Atlantic waters: Crucial developmental habitat for Kemp's ridley and loggerhead sea turtles. *Chel. Conserv. Biol.* 4(4):872-882.
- Murawski, S. A. and A. L. Pacheco. 1977. Biological and fisheries data on Atlantic Sturgeon, *Acipenser oxyrinchus* (Mitchill). National Marine Fisheries Service Technical Series Report 10: 1-69.
- Savoy, T. and D. Pacileo. 2003. Movements and important habitats of subadult Atlantic sturgeon in Connecticut waters. *Transactions of the American Fisheries Society* 132: 1-8.
- Shoop, C.R. and R.D. Kenney. 1992. Seasonal distributions and abundances of loggerhead and leatherback sea turtles in waters of the northeastern United States. *Herpetological Monographs* 6: 43-67.
- Smith, T. I. J. 1985. The fishery, biology, and management of Atlantic sturgeon, *Acipenser oxyrinchus*, in North America. *Environmental Biology of Fishes* 14(1): 61-72.
- Stein, A. B., K. D. Friedland, and M. Sutherland. 2004. Atlantic sturgeon marine distribution and habitat use along the northeastern coast of the United States. *Transactions of the American Fisheries Society* 133: 527-537.
- Vladykov, V.D. and J.R. Greeley. 1963. Order Acipenseridae. Pages 24-60 in *Fishes of the Western North Atlantic*. Memoir Sears Foundation for Marine Research 1(Part III). xxi + 630 pp.
- Welsh, S. A., S. M. Eyler, M. F. Mangold, and A. J. Spells. 2002. Capture locations and growth rates of Atlantic sturgeon in the Chesapeake Bay. Pages 183-194. In: W. Van Winkle, P. J. Anders, D. H. Secor, and D. A. Dixon, (editors), *Biology, management, and protection of North American sturgeon*. American Fisheries Society Symposium 28, Bethesda, MD.
- Wirgin, I. and T.L. King. 2011. Mixed stock analysis of Atlantic sturgeon from coastal locales and a non-spawning river. Presentation of the 2011 Sturgeon Workshop, Alexandria, VA, February 8-10.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
3817 Luker Road
Cortland, New York 13045



April 7, 2015

Mr. Chris Soller
Superintendent
Fire Island National Seashore
120 Laurel Street
Patchogue, NY 11772

Dear Superintendent Soller:

The U.S. Fish and Wildlife Service (Service) has reviewed the National Park Service's (NPS) Fire Island National Seashore's (FIIS) Preliminary Agency Draft General Management Plan/Environmental Impact Statement (GMP/EIS) for the Fire Island National Seashore (Seashore). We provide the following comments under the Endangered Species Act (ESA) of 1973, as amended (87 Stat. 884, as amended; 16 U.S.C 1531 *et seq.*).

General Management Plan Preferred Alternatives

The NPS's preferred alternative is "Management Alternative 3: Recognizing the Relationship between Human Use and Nature."

This alternative would entail a proactive and collaborative management approach, in order to seek a balance between continuing human use and protecting Fire Island's fragile environment. The alternative includes the following components:

- Conduct outreach and collaborative efforts to enhance the public's understanding and appreciation of the Seashore;

- Retain and improve existing infrastructure;

- Possibly expand some development areas, with new development limited to existing visitor use areas; such development would be undertaken only after appropriate climate change and sea-level rise assessments have been completed;

- Maintain natural resource management at levels described in Management Alternative 1;

- Restore Sunken Forest and other maritime forests on Fire Island, in conjunction with the redesign of the Sailors Haven marina to minimize the bayside erosion;

- Improve water quality through the development and implementation of a wastewater management plan;

- Manage invasive species;

Manage cultural resources via comprehensive cultural landscape report that examines the history of Fire Island as a whole and its various stages of use and development. Offer technical assistance to Fire Island communities seeking to inventory, protect, and interpret their own cultural resources;

Integrate visitor experiences to include cultural and natural resources. Increase the distribution and dispersion of visitors across Seashore facilities and encourage a broad range of experiences; and

Rehabilitate the Wilderness Visitor Center to improve universal accessibility and update interpretive media. Work collaboratively to re-establish a residential environmental education program that would be housed in existing facilities during the Seashore's shoulder seasons.

Endangered Species Act Comments

Federally-listed species that are known to use FIIS lands include the piping plover (*Charadrius melodus*; threatened), roseate tern (*Sterna dougallii dougallii*; endangered), seabeach amaranth (*Amaranthus pumilus*; threatened), red knot (*Calidris canutus rufa*; threatened), and northern long-eared bat (*Myotis septentrionalis*; threatened). The Preliminary GMP/EIS should address red knot and northern long-eared bay due to their recent inclusion on the list of endangered species. Other sensitive species, include, but are not limited to, the bald eagle (*Haliaeetus leucocephalus*), northern harrier (*Circus cyaneus*), and saltmarsh sharp-tailed sparrow (*Ammodramus caudatus caudatus*).

The Service notes that the NPS has a long history of proactively managing listed species at FIIS under section 7(a)(1)¹ of the ESA and of consulting with the Service under section 7(a)(2). Endangered Species protection and management are currently guided by the FIIS's Endangered Species Habitat Management Plan (1998). The Service recognizes the substantial benefits to listed species provided by the NPS's ongoing monitoring, management, and protection of listed species and their habitats at FIIS.

The Draft GMP/EIS describes a number of existing programs and new initiatives that are being considered. We believe that, due to the nature of the GMP process, conservation planning under section 7(a)(1) of the ESA is most appropriate, considering the fact that there is not enough specific information about on-the-ground impacts to determine if there would be an adverse effect from a specific project or activity, or what the amount of incidental take might be. By identifying potential program effects and developing guidelines to minimize these effects to listed species and designated critical habitats, subsequent "stepped-down" consultations, where more specific effects on species can be determined within the context of a local geographical area, can be done more expediently. Following our review of the GMP/EIS and the effects analysis, the Service finds that the NPS's proposed adoption of the new GMP falls into this category (*i.e.*, of insufficient project-specific information) and, therefore, is more appropriately addressed by a section 7(a)(1) conservation review.

This type of review would provide an outline of a "blueprint for conservation activities" that could be taken over the life of the GMP and can be used to support section 7(a)(2) by identifying

¹ This section of the ESA states, "The Secretary shall review other programs administered by him and utilize such programs in furtherance of the purposes of this Act. All other Federal agencies shall, in consultation with and with the assistance of the Secretary, utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species listed pursuant to section 4 of this Act."

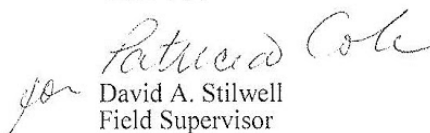
the conservation needs of listed species and targeting actions to address those needs. Essentially, section 7(a)(1) would provide a framework for the NPS to guide implementation of their programs at the landscape level consistent with purpose of conserving "ecosystems" upon which these species depend. Overall, a park-wide section 7(a)(1) program will facilitate improved implementation of the NPS's mission by proactively planning agency activities in a way that is consistent with species' recovery. Such planning will increase regulatory certainty, decrease regulatory conflict and delays, and significantly streamline section 7(a)(2) consultations for individual projects.

This conservation planning will enable the NPS and Service to better synchronize their actions and programs with the conservation and recovery needs of listed species. Such planning can aid the NPS, in consultation with the Service, in developing specific pre-approved design criteria to ensure their actions are consistent with the recovery needs of the species. Thus, early conservation planning would enable the NPS to engage in activities that provide a net improvement in the status of the species and acquire information needed to make appropriate adjustments to actions that may adversely affect species while there is the maximum flexibility to modify project designs and avoid or minimize impacts. Both of these benefits will greatly facilitate and expedite the section 7(a)(2) consultation process.

We believe that the next step in this process would be to schedule a meeting between our agencies to further outline the elements of a section 7(a)(1) conservation plan, bringing in components of the GMP, and other measures jointly developed by our agencies. Some measures which the NPS would undertake as described in the GMP/EIS, such as implementation of endangered species protection and monitoring efforts, could be incorporated into this effort. We believe this effort will allow us to achieve a better and more efficient approach to conservation.

Thank you for the opportunity to review the GMP/EIS. Please contact Steve Papa of the Long Island Field Office at (631) 286-0485, when you are ready to undertake the section 7(a)(1) review.

Sincerely,


David A. Stilwell
Field Supervisor



ANDREW M. CUOMO
Governor

Parks, Recreation and Historic Preservation

ROSE HARVEY
Commissioner

September 17, 2015

Mr. K. Christopher Soller
Superintendent
National Park Service
Fire Island National Seashore
120 Laurel Street
Patchogue, NY 11772

Re: NPS - Fire Island National Seashore Draft General Management Plan/EIS
Fire Island National Seashore and William Floyd Estate
15PR05410

Dear Mr. Soller:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the project in accordance with Section 106 of the National Historic Preservation Act of 1986. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

Based upon this review, the New York SHPO concurs with the National Park Service that the preferred Management Alternative for the Fire Island National Seashore is *Alternative 3: Recognizing the Relationship Between Human and Nature*; and the preferred Management Alternative for the William Floyd Estate is *Alternative B: Historical Park And Museum*. We agree with the need for further investigation and protection of archaeological resources. We note that the last Historic Resource Study dates from 1979, and suggest that an updated survey be undertaken of all pre-1970 built resources that are located on federal lands or are under federal ownership. An assessment of these resources (including visitor facilities, staff housing, and rental units, for example) would inform future SHPO reviews of any plans to upgrade, replace or remove these resources. We endorse the emphasis on further survey work as noted in Chapter 4, page 254:

In addition, under Alternative 3, the NPS would work collaboratively with the New York SHPO and interested Fire Island communities to undertake a formal inventory of historic resources on non-federal lands within the boundary of the Seashore. The proposed efforts to inventory and document other historic properties on Fire Island could ultimately improve their prospects for long-term protection and would contribute to the preservation of the larger historic context of the federally-owned historic structures.

Continued

Division for Historic Preservation

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • www.nysparks.com

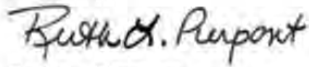
NPS - Fire Island National Seashore Draft General Management Plan/EIS
Fire Island National Seashore and William Floyd Estate
15PR05410

2

Chapter One, page 23, includes a sheet outlining "Important Resources and Values" that highlights the Carrington House and Cottage. Will the final plan include a similar document for the other historic resources? It would be useful to include more information about all historic resources, including the William Floyd Estate and the Fire Island Light, if not in the main text then in an appendix.

If further correspondence is required regarding this project, please be sure to refer to the OPRHP Project Review (PR) number noted above.

Sincerely,



Ruth L. Pierpont
Deputy Commissioner for Historic Preservation

Division for Historic Preservation

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Fire Island GMP, NPS <fire_island_gmp@nps.gov>

GMP comments

Eileen O'Neil <epko65@aol.com>

Fri, Sep 11, 2015 at 12:26 PM

To: "Fire_Island_GMP@nps.gov, chris_soller@nps.gov" <Fire_Island_GMP@nps.gov>, chris_soller@nps.gov

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 Lyme 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.

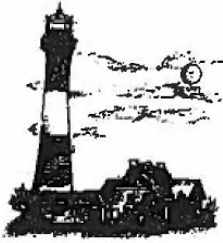
Each year the community members, visitors and trades people want to be reassured that the Four Poster tick prevention program continues. The Fairharbor/Dunewood Medial District budgets a significant portion of our taxes to support this program. We are convinced from our own experience that the reduction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

Sent from my iPad

Sep. 16. 2015 10:45AM

No. 2641 P. 2



Fire Island Union Free School District

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Ph: (631) 583-5626 Fax: (631) 583-5167

www.fik12.ny.us

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September 16, 2015

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 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

Sep. 16. 2015 10:45AM

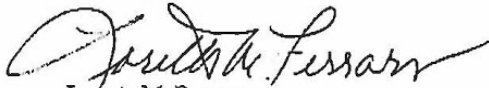
No. 2641 P. 3

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

Town of Brookhaven, New York

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 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 Secretary's 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 Board's 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% maximum 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 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 Secretarys 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 specifity 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 Secretarys 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 #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 Gilibrand
Representative Lee Zeldin
Sally Jewel, Secretary of the Interior
Karl Christopher Soller, Superintendent FI National Seashore
Mike Caldwell, Regional Director, National Park Service



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*Received Sep 9, 2015
elc*

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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."

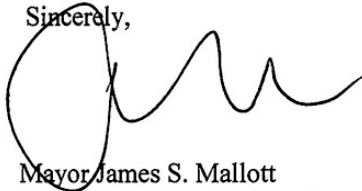
The FINS Draft GMP therefore already makes numerous references to the deteriorating state of both the Great South Bay, as well as our wastewater treatment systems. It acknowledges the severity of the issue by including it in both Alternatives 2 and 3. Yet it is only considered a medium-level priority. 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 re flourishing 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,

A handwritten signature in black ink, appearing to be 'J. S. Mallott', written over the word 'Sincerely,'.

Mayor James S. Mallott
Inc. Village of Ocean Beach

JSM:hs

Encl.

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 Policies 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 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



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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.

Audubon New York's Comments on the Fire Island National Seashore Draft GMP/EIS

1. What ideas or proposals do you like about the preferred alternative for Fire Island and the William Floyd Estate? (continued)

- 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) 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).

Audubon New York's Comments on the Fire Island National Seashore Draft GMP/EIS

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

- 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 607-254-2437.

Sincerely,



Erin Crotty
Executive Director and Vice President, Audubon New York

Audubon New York's Comments on the Fire Island National Seashore Draft GMP/EIS



Received 07.28.2015
elc.

132 Clyde Street, West Sayville, NY 11796
P: 516.323.3591 F: 631.319.6195
E: jtanacredi@molloy.edu

July 8, 2015

Attn: Ms. Ellen Carlson
Fire Island Natural Seashore GMP
15 State Street
Boston, Massachusetts 02109

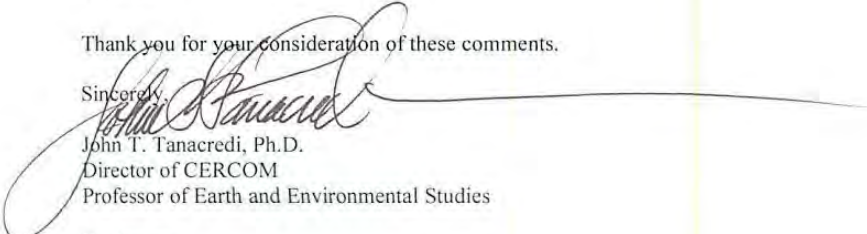
Dear Ms. Carlson:

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

Received Oct 07, 2015 (elc)



Fire Island Association, Inc.

Suzanne Goldhirsch
President

201 E. 87th St. # 7P
New York, NY

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 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.

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 long-term 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:

- 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 inter-community 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 through-out 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.

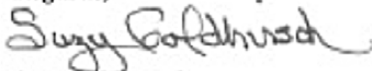
Our enthusiastic support of the conceptual management framework outlined in the GMP is tempered, however, by very real questions concerning "next steps." After the long and complicated effort to reach consensus on a set of management policies and guidelines which will be approved as the final version 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

Fire Island Conservancy

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

Fire Island Lighthouse Preservation Society, Inc.


THE FIRE ISLAND LIGHTHOUSE PRESERVATION SOCIETY, INC.

A Cooperating Association with the National Park Service
Fire Island National Seashore

July 8, 2015

Fire Island National Seashore
General Management Plan
Attn: Ellen Carlson, Project Manager
15 State Street
Boston, MA 02109

RECEIVED
JUL 13 2015

FIRE ISLAND NATIONAL SEASHORE
PATCHOGUE, NEW YORK 11772

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Mark C. Nuccio
Thomas F. Roberts, IV

OFFICE STAFF

David Griesse
Administrator
Patricia Stanton
Administrator Assistant
Lynn Dunlop
Program Coordinator

General Management Comments

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 La Rosa
President

Cc Chris Soller

4640 Captree Island, Captree Island, New York 11702-2601 - (631) 321-7028 - FAX (631) 321-7033
Website - www.fireislandlighthouse.com E-mail - programs@fireislandlighthouse.com

Sep. 17. 2015 11:06AM

No. 2648 P. 2



FIRE ISLAND YEAR ROUND RESIDENTS ASSOCIATION

September 16, 2015

Officers:

Dawn Lippert
President

Peggy Danziger
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Karen Spollen
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Ian Levine
Gail Stamler
Ocean Beach

Luke Kaufman
Seaview

Jeanne Lynch
Ocean Bay Park

Robert Bragg
Point O' Woods

Walter Boss
Fire Island Pines

Stan Livingston
Davis Park

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.

PO BOX 305, OCEAN BEACH, FIRE ISLAND NEW YORK 11770

Sep. 17. 2015 11:06AM

No. 2648 P. 3

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 50 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.

Sep. 17. 2015 11:07AM

No. 2648 P. 4

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 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.
- 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.

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 Residents Association

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SEP 17 2015
FIRE ISLAND NATIONAL SEASHORE
PATCHOGUE, NEW YORK 11772

Comments on the Fire Island National Seashore

**Draft General Management Plan
Environmental Impact Statement**

submitted September 17, 2015 by the

Fire Island Wilderness Committee

**Fire Island Wilderness Committee
PO Box 25183**

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 (FIS), 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 FIS 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

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 also 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.

1.

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.

2.

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.

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. 3.

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 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 Trail

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.

4.

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).

5.

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.

6.

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 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. 7.

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 Wildernesss 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.

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.

8.

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," 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 untrammelled character of the Fire Island Wilderness. (GMP p.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.

9.

Indian Ceremonies

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.

10.

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 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 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 various 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)*"

11.

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 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)

12.

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 GMP/EIS 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 GMP/ 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).

13.

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 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. •

14.

- 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.

Conclusion

It is appropriate that the Fire Island Wilderness Area/ 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 Moynihan'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'll 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.

Fire Island Wildlife Foundation

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.

JUST:US Coalition to Serve and Preserve Fire Island

JUST:US

a coalition to serve and preserve Fire Island Seashore

17 September 2015

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

via <jon_jarvis@nps.gov>

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 island’s 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.

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?”

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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 8½ 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.

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-IIQ2yeeaevu-tG6qGDq_Cl&hl=en&sa=X&ved=0CCEQ6AEwAGoVChMly9b7kMD-xwIVAVY-Ch3-lwXG-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.

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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 GMP's 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

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 Superintendent's name.

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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 Island's (as well as their own real estate investment's) 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?

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.

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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?

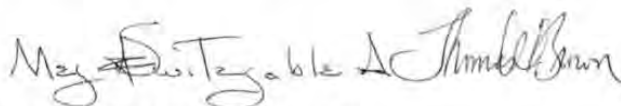
We hope this letter will spur NPS to action. We believe it unwise and unrealistic to further relax federal regulations and somehow expect the local governments to step up with the necessary protections. Neither civil nor gay rights would have happened had the federal government taken such a course.

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 let's just hope that by the time action is finally taken, it will not be too late because, as environmentalists remind us, once it's gone, it's gone forever.

Yours truly,

The JUST:US Coalition to Serve and Preserve Fire Island:



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>

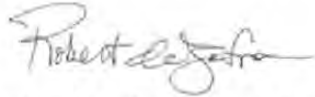


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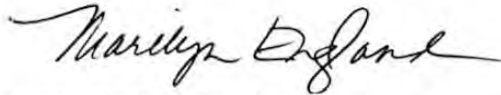
17 September 2015



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

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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 ½ bathroom Fire Island Pines house



Nassau Hiking & Outdoor Club, Inc.

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 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 understands.

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% applied pesticides miss their target, reaching nearby people, wildlife, waterways, soil and air. Moreover, Earthjustice contends that children are the most vulnerable: they drink 20 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 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 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
Open Space Council

OPEN SPACE COUNCIL
PO BOX 275 • BROOKHAVEN, NY 11719

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 VWT) which already exists and appears to be increasing rather than decreasing.

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.

Jonathan Jarvis - FI General Management Plan, 2015
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OSC

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

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Wilderness Area, approaching from the west, the trail 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.

Jonathan Jarvis - FI General Management Plan, 2015
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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 non-native, 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 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

Karen Blumer
Vice President, Open Space Council
Administrator, Carmans River Watershed Trust Fund



**POINT O'WOODS ASSOCIATION
POINT O'WOODS
NEW YORK
11706**

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631-583-5660

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631-583-7326

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 –

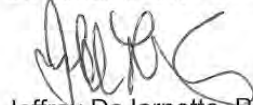
- Collaborative stewardship seeded in a positive working relationship with the NPS
- Preservation and maintenance of Fire Island's unique character
- Maintenance and restoration of Fire Island's Natural Systems, including identifying and preserving its distinct character
- Historical preservation and 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 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

Via: Email – fire_island_gmp@nps.gov
chris_soller@nps.gov
First Class Mail



September 17, 2015

Via email (Jon_Jarvis@nps.gov)

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

Re: 2015 Draft Fire Island General Management Plan

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.)

SEATUCK ENVIRONMENTAL ASSOCIATION
P.O. Box 31 Islip NY 11751 • (631) 581-6908 • staff@seatuck.org

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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."

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

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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

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

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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

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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 the dunes and the bay.

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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

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plant populations under Alternative #3. If true, this would be an unacceptable retreat from what is being increasingly recognized as 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

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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 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.

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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

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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 Seaturck 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, Seaturck also supports the Alternative #1 proposal to expand citizen science programs at the National Seashore (p. 69). Seaturck 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

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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

ENRICO G. NARDONE
Executive Director

cc: Christopher Soller
Superintendent
Fire Island National Seashore
(Chris_Soller@nps.gov)

**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 6" - 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 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.

Bill Stegemann
South Shore Audubon Society

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 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

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Arthur I. Weinstein

631-583-4205

p.2

**The Kismet Community Association, Inc.
Kismet, Fire Island, New York**

Mail Reply to:
P.O. Box 284
Brightwaters, NY 11718

October 1, 2015

K. Christopher Soller
Superintendent
Fire Island National Seashore

RE: Comment: "Draft Fire Island National Seashore General Management Plan"

Dear Superintendent Soller:

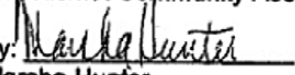
The members of the Kismet Community Association wish to express their support of "Alternative #3 of the proposed General Management Plan of the Fire Island, National Seashore. We represent the 225 homeowners in the Hamlet of Kismet, Town of Islip.

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.

Very truly yours,
The Kismet Community Association

By: 
Marsha Hunter
President

Water Island Association**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.

Suzanne Johnson

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