



November 23, 2016

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

**RE: Comments on the Wilderness Breach Management Plan /
Environmental Impact Statement (EIS)**

Dear Superintendent Soller:

These comments on the Wilderness Breach Management Plan / Environmental Impact Statement (Breach Plan/EIS) are provided on behalf of the Seatuck Environmental Association, which has had a longstanding interest in the ecological health and restoration of the Great South and Moriches Bay ecosystems. We have followed with interest the public discourse regarding the formation of the Wilderness Breach and the decision-making process the National Park Service (NPS) has undertaken regarding its management, culminating in the preparation of the Breach Management Plan and EIS.

We support the breach remaining open due to the numerous, scientifically documented, ecological and water quality benefits, many of which are explained in detail in the EIS. Therefore, we support Option 3, NPS's preferred option to allow for the breach to remain open unless certain dimensional criteria are exceeded, at which point NPS would move to close it.

While supportive of NPS's preferred option, we nevertheless note the fundamental difference in approach that exists between Option 3 and the breach management strategy outlined in the U.S. Army Corps of Engineers' proposed Fire Island to Montauk Point plan (FIMP). The FIMP creates three categories of breach management: one for areas where it seeks to prevent breaches from forming (*Proactive Breach Response*), one for areas where breaches that do form must be closed immediately (*Reactive Breach Response*), and a third for those areas where breaches can be permitted to exist temporarily, but only if a breach closure team decides the breach is "closing naturally" (*Conditional Breach Response*). NPS Option 3, on the other hand, allows a breach to remain open and act naturally, unless certain criteria are met that mandate closure.

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This difference in approach between NPS and the Army Corps, while hypothetical with regard to the Wilderness Breach (since the FIMP is still in draft form and not controlling), is a divergence that should be addressed. The NPS Wilderness Breach Management Plan is, on its face, limited to the existing breach (and only necessary because of the lack of guidance provided by the current Breach Contingency Plan), but it is reasonable to expect that the well-supported document will be influential with regard to future Fire Island breaches, especially in the Wilderness Area. However, to the extent the FIMP is in place in its current form, the approach of the Wilderness Breach Management Plan will be superseded by the Army Corps' approach.

We urge that this difference be resolved in favor of the NPS approach. We encourage NPS to push for its more reasoned breach management approach to be integrated into the FIMP during final negotiation over the plan in the coming year. In fact, in our comments on the FIMP, we urged the adoption of a genuinely nuanced, science-based decision making process similar to what took place with the Wilderness Breach in 2012. There, NPS led an effort to convene a team of scientific experts to assess the situation, monitor the breach, gathered data (about impacts to tides, storm risks and ecological conditions), and offer advice on both storm risks and ecological benefits. We urge that a similar process be followed for all future breaches on Fire Island.

In addition, we have the following specific comments on the Breach Plan/EIS:

- To mitigate against the adverse effects of mechanical closure on Piping Plover breeding, the Breach Plan/EIS wisely stipulates that mechanical construction activities occur outside of the breeding season. We note that the Wilderness Breach also provides important stopover habitat for the Federally listed Red Knot (*Calidris canutus*). These birds refuel at the inlet, feasting on small mussels and invertebrates during bimodal migrations that peak in May and again in late October. We urge that efforts be included to limit construction activities from these migration seasons to avoid adverse effects on the Red Knot.
- The final sentence of the Executive Summary (p. xii) the authors use the word anthropomorphic; this should be replaced with anthropogenic.

Seatuck appreciates the opportunity to comment on the Breach Plan/EIS for the Otis Pike High Dune Fire Island Wilderness Area Breach. Please let us know if you have any questions or require additional information.

Very truly yours,

Enrico Nardone

Enrico Nardone
Executive Director