

December 12, 2016

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

RE: Draft Fire Island Wilderness Breach Management Plan and Environmental Impact Statement

Dear Superintendent,

The following are comments from Wilderness Watch on the Draft Fire Island Wilderness breach Management Plan and Draft EIS (DEIS). Wilderness Watch is a national wilderness conservation organization focused on the protection of the National Wilderness Preservation System, including the Otis Pike Fire Island High Dune Wilderness within Fire Island National Seashore.

On October 29, 2012, Hurricane Sandy created three breaches through the Fire Island National Seashore, including the one within the designated Fire Island Wilderness that is the subject of this Draft Plan and DEIS.

Administration of the Fire Island Wilderness is governed by the 1964 Wilderness Act (16 U.S.C. 1131-1136) as well as the special provisions in the legislation that designated the Fire Island Wilderness. The Wilderness Act defines Wilderness in part as “a place where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.” The principle, single purpose of the 1964 Wilderness Act is to preserve the wilderness character of the Wildernesses in the Wilderness System.

Congress designated the now-1,380-acre Otis Pike Fire Island High Dune Wilderness in 1980 via passage of Public Law 96-585. Subsection (d) of that law says, “Wilderness designation shall not preclude the repair of breaches that occur in the wilderness area, in order to prevent loss of life, flooding, and other severe economic and physical damage to the Great South Bay and surrounding areas.”

The Draft Plan and DEIS propose three alternatives:

- **Alternative 1** would close the breach using mechanical processes.
- **Alternative 2** is the no-action alternative. This alternative would allow the evolution, growth and/or closure of the breach to be determined by natural barrier island processes and no human intervention would occur.
- **Alternative 3** is the Proposed Action and NPS Preferred Alternative. This alternative would allow no human intervention except “to prevent loss of life, flooding, and other severe economic and physical damage to the Great South Bay and surrounding areas.”

**Wilderness Watch believes that the only alternative that will protect the wilderness character of the Fire Island Wilderness in the long run and in accordance with the Wilderness Act is Alternative 2, the No-Action Alternative.**

Alternative 1 would obviously damage the wilderness character of the Fire Island Wilderness. Alternative 3 would only delay the damage to the wilderness character until some group or faction can muster enough political influence to force the National Park Service to close the breach.

Wilderness Watch appreciates the restraint shown by the NPS so far in resisting calls to fill in the breach. But we also know how easily political pressure could be mounted by one of the wealthy shoreline homeowner groups in the area, for example, or some other interest group, to pressure the NPS to mechanically close the breach because of feared expected flooding or economic or physical damage. This is another reason why we believe that Alternative 2 is the best choice.

Wilderness Watch appreciates this opportunity to comment. Please keep our organization on your contact list for future steps in this process on this issue.

Sincerely,

Kevin Proescholdt  
Conservation Director  
Wilderness Watch