



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

**NOV 30 2016**

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

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

Dear Sir or Madam:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the Fire Island Wilderness Breach Management Plan (CEQ # 20160250) located along the National Park Service's (NPS) Otis Pike Fire Island High Dune Wilderness Area (Wilderness Area) in Fire Island, New York. This review was performed in accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA).

In October 2012, a breach was formed in the Wilderness Area as a result of storm effects from Hurricane Sandy. The NPS's Wilderness Management Plan now in effect stipulates that an environmental impact statement must be prepared and public review conducted before closure of the breach could be made. This DEIS evaluates three alternatives for managing the breach. Alternative 1 (Closure Using Mechanical Processes) would mechanically close the breach as soon as possible. Alternative 2 (Status Determined Entirely by Natural Processes) is the no-action alternative; this alternative would allow the management of the breach under natural processes, to include evolution and potential growth and/or natural closure. Alternative 3 (No Human Intervention unless Established Criteria are Exceeded), the proposed action, is identified as the NPS's preferred alternative. Under alternative 3, the evolution, growth, and/or closure of the breach would be determined by natural barrier island processes, and human intervention to close the breach would occur only "to prevent loss of life, flooding, and other severe economic and physical damage to the Great South Bay and surrounding areas," as allowed by the Otis Pike Fire Island High Dune Wilderness Act. If the breach were to close by natural processes, no human intervention would be taken to reopen it. The breach would be closed mechanically if evaluation of annual monitoring data indicates that changes in the conditions of the breach could elevate the risk of severe storm damage.

EPA has the following comments on the DEIS:

- The preferred alternative is described as “no human intervention unless established criteria are exceeded” (Page IX). The breach would be monitored by NPS personnel, and two criteria would be used – Geologic Controls and Cross-Sectional Area. However, no actual values for those criteria are given (i.e., if the breach is “x” wide, it will be closed), and no methodology as to how the values will be determined is discussed. Without these values, or at least a plan as to how to determine those values, it would appear that this alternative is open ended, and for all intents and purposes, no different from Alternative 2.
- If and when the breach is closed manually, the NPS must perform a General Conformity applicability analysis (see 40 CFR 93.153) to ensure that the action will not (1) cause or contribute to any new violation of any air quality standard, (2) increase the frequency or severity of any existing violation of any air quality standard, or (3) delay timely attainment of any standard or any required interim emission reductions or other milestones in any area. This should be added to Chapter 5.

Based on our review and in accordance with EPA policy, we have rated this DEIS as EC-2 (see enclosure), indicating that we have environmental concerns (EC) regarding information on criteria value for breach closure and the inclusion of a General Conformity discussion.

Thank you for the opportunity to comment on this project. If you have any questions, please contact Lingard Knutson at (212) 637-3747 or [Knutson.lingard@epa.gov](mailto:Knutson.lingard@epa.gov).

Sincerely,

  
Judy-Ann Mitchell, Chief  
Sustainability and Multimedia Programs Branch

Enclosure

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