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## Chapter 6: Comments and Responses to Comments on Draft Plan





# Summary of Public Comment Process

This chapter presents the analysis of public and agency comments received on the draft GMP/EIS with NPS responses. The draft GMP/EIS was released for public review on August 2, 2013. The draft GMP/EIS was available at the park and on the National Park Service planning website (<http://parkplanning.nps.gov/gate>). Information about the review period was sent out to the park's GMP mailing list and posted on the park's website and Facebook page. The public was able to submit comments on the plan using any of the following methods: electronically through the NPS Planning, Environment, and Public Comment (PEPC) website; in person at public open house meetings or by mailing comments to the NPS.

During the comment period, NPS hosted three public open house meetings in August at the Ryan Visitor Center at Floyd Bennett Field (Brooklyn, New York), Sandy Hook Light House (Sandy Hook, New Jersey), and the Fort Wadsworth training room (Staten Island, New York) to provide information and answer questions on the draft GMP/EIS, distribute copies of the document and gather public comments. In September 2013, the park held another two public open houses and stakeholder meetings at the Jamaica Bay Wildlife Refuge Visitor Center (Queens, New York) and the Fort Hancock Chapel (Sandy Hook, New Jersey). The review period was 90 days and ended on October 22, 2013.

## Comment Analysis Process

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by NPS in organizing, clarifying, and addressing technical information pursuant to National Environmental Protection Act (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

This chapter includes a synopsis of concerns voiced by citizens and groups regarding the draft GMP/EIS. These concerns are captured in "concern statements" followed by a quote from a letter best representing that concern. The representative quotes are not intended to be an exhaustive list of every comment but are instead a representation of the types of comments received on the scope of the draft GMP/EIS.

All comments were read and analyzed. The analysis process attempts to capture the full range of public concerns received on the draft GMP/EIS. 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 715 pieces of correspondence were received, all of which were carefully reviewed by the NPS. From these, a total of 2,592 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:

- Suggestions for changes to historic resources management at the park including maximizing re-use by lessees; less commercialization of historic buildings; adding a museum or enlarging existing museums; suggestions on which specific structures to interpret and which to protect; suggestions on what specifically to preserve in existing buildings (roofs, employee housing; gymnasium); buildings that should be preserved instead of stabilized; retrofitting to better withstand storm damage; highest priority buildings within the preservation category;
- Suggestions for more or fewer facilities including adding festivals to raise funds; reducing boating; add boating ramps and access; adding fishing; where to have trails or blinds, add signs and how to name areas; eliminating camping or boat launches at Sandy Hook; changes in use of the community garden or concessions; removing some uses from Floyd Bennett Field; changes or restoration of the marina at Great Kills Park; opening and closing time suggestions for visitor centers or the park itself;
- Suggestions for changes to natural resources management at the park including increasing enforcement to protect birds at Spermaceti Cove; how to manage grasslands at Floyd Bennett Field; how and where to locate campgrounds to avoid impacts to wildlife; management of East Pond to maximize breeding by shorebirds; predator control; noise control; and managing Plumb Beach to minimize recreational uses.
- Restoring West Pond and specifics on how to do so, what to plant and how to manage vegetation, whether to return to a larger pond or the pre-storm size pond; installing boardwalks, trails or viewing towers;
- Staffing suggestions including improved enforcement to protect safety and resources; specific hiring suggestions such as for landscape managers or staff with particular educational backgrounds, or for patrolling waters of Jamaica Bay.
- Concerns over impacts to birds and habitat across the park as well as specific concerns for birds and habitat at Sandy Hook including effects of camping and concentrated human use; boating near nesting wildlife in Jamaica Bay or along the Sandy Hook shoreline; habitat removal to create campgrounds, trails and other recreation opportunities.
- Concerns over impacts to rare or listed vegetation and wildlife from increased activity and/or facilities in or adjacent to their habitat including camping, trails, the introduction of overnight visitation, noise, trampling of habitat, and introduction of human activities in areas where it does not occur now, such as on Hoffman Island and Canarsie Pol.

The NPS also received many comments regarding park management and how it should be directed, including: prioritizing protection of resources or open space; prioritizing preservation and protection of wildlife and habitat at Sandy Hook; maintaining Jamaica Bay in an undisturbed state free from active recreation and development; applying lessons learned from Hurricane Sandy; protecting threatened or endangered species; eliminating, reducing, balancing or increasing active recreation in the park; and prioritizing and

reducing protection of historic structures. Other comments received included comments on transportation issues, planning suggestions, costs, safety issues, community involvement and specific community concerns.

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.

## Changes to the Preferred Alternative

The NPS has made changes to its preferred alternative, alternative B, as a result of public comment and consultation with the U.S. Fish and Wildlife Service under Section 7 of the federal Endangered Species Act. The majority of these changes are revisions to management zones in various park areas. Maps in chapter 2 for each park unit reflect relevant management zoning revisions as well as descriptions of the park areas from pages 77-99.

Changes to management zoning in alternative B are summarized below:

In the Jamaica Bay Unit:

- Plumb Beach – Recreation Zone along the shoreline changed to Natural Zone
- Bergen Beach – Recreation Zone in northern section changed to Natural Zone
- Floyd Bennett Field area – Recreation Zone around the marina was reduced and Natural Zone increased
- Jamaica Bay Wildlife Refuge – Natural Zone on Canarsie Point and Ruffle Bar changed to Sensitive Resource Subzone; some areas of Natural Zone along the shoreline changed to Sensitive Natural Subzone; Sensitive Natural Resource Subzone changed to Natural Zone west of New York City's Sunset Park
- Silver Gull Beach Club and Breezy Point Surf Club – changed Active Beach Subzone to Recreation Zone
- Breezy Point Tip – increased Sensitive Resource Subzone and decreased Natural Zone

In the Sandy Hook Unit:

- North Tip- Natural Zone decreased and Sensitive Resource Subzone increased over vast majority of area

- North Beach/Fort Hancock Parade Ground area – increased Historic Zone; modified Recreation Zone; decreased Active Beach Subzone
- Maritime Holly Forest - Sensitive Resource Subzone increased between Nike Missile sites
- Spermececi Cove – Natural Zone changed to Sensitive Resource Subzone
- Beach Area B – shoreline south of area B changed from Recreation Zone to Natural Zone
- Developed Zone – increased multiple areas to reflect maintenance areas and water/sewage treatment facilities

In the Staten Island Unit:

- Hoffman Island – Natural Zone changed to Sensitive Resource Subzone
- Great Kills Park – Sensitive Resource Subzone added along northern shoreline; Recreation Zone replaced with Natural Zone along Hylan Boulevard and Ranger Station

## Comment Response Organization

NPS responses to the specific concerns and issues outlined above are provided in this chapter. The substance of the comments grouped under each topic is expressed as one or more concern statements, with representative examples of the comments from that group, followed by the NPS response. The chapter is organized by the following major topics:

- Climate Change
- Community Involvement
- Cultural Resources and Management
- Fundamental Resources
- Natural Resources and Management
- Park Operations and Management
- Recreation Management
- Site Specific Analysis and Data
- Traffic and Transportation

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.

# List of Commenters

The following government agencies and organizations submitted comments on the draft plan. Copies of letters received from agencies are in Appendix C. Some individuals submitting comments choose to list themselves as a member of a group. This does not necessarily mean that the comments represent the official group.

## Agencies

Environmental Protection Agency  
U.S. Fish and Wildlife Service

## State Agencies

New York State Historic Preservation Office

## Regional or Local Government Agencies

Monmouth County Planning Board  
New York City Department of Parks and Recreation  
The Port Authority of New York and New Jersey

## Organizations

American Forts Network  
American Littoral Society- Northeast Chapter  
Army Ground Forces Association  
Audubon New York  
Black Hills Audubon  
Boy Scouts of America  
Breezy Point Cooperative Inc.  
Broad Channel Civic Association  
Brooklyn Bird Club  
Chesapeake Audubon  
City University of New York  
Coast Defense Study Group  
Committee to Save Great Kills Park Marina  
Conserve Wildlife Foundation of New Jersey  
Eastern Long Island Audubon Society  
Fire Island Raptor Enumerators  
Floyd Bennett Garden Association  
Fort MacArthur Museum  
Fyke Nature Association  
Genesee Valley Audubon Society  
Great Gull Island Project

Hudson River Audubon Society of Westchester  
Hudson-Mohawk Bird Club  
Huntington UFSD  
Huntington-Oyster Bay Audubon Society  
Jamaica Bay Ecowatchers  
Kymry Group, Bird Calls Radio  
Lehigh Valley Audubon  
Linnean Society of New York  
Mearns Bird Club  
Monmouth County Audubon Society  
National Parks and Conservation Association  
National Rifle Association  
Natural Resources Protective Association  
Nuture Environmental Stewardship Today!  
New Jersey Audubon  
New Jersey Beach Buggy Association  
New Jersey Trappers Association  
New York City Audubon  
New York Climate Action Group  
New York State Ornithological Association  
New York State Young Birders Club  
Northern Catskills Audubon, Inc.  
Postal Logic LLC  
Protectors of Pine Oak Woods  
Queens County Bird Club  
Ray's Bike Rentals  
Rockaway Little League  
Rutgers University  
Saw Mill River Audubon  
Sierra Club  
South Shore Audubon  
Starrett City Tenants Association  
Waterman Bird Club  
Wattles Stewardship Center



# Public Comment Summary

## Climate Change

**Concern Statement:** Commenters noted that the park should protect resources from future storm events and apply lessons learned from Hurricane Sandy recovery.

Examples of comments:

- Any final Gateway plan and strategy should also incorporate lessons learned from Sandy to prevent and mitigate loss to Gateway assets, land and resources
- First, climate change, and the impact of expected super storms like Hurricane Sandy, make it imperative that bold steps be taken to return large parts of this historical wetland to its natural state where it can again fulfill its age old function of storm surge mitigation and serve as a buffer and a filter when waters inundate our shorelines and then recede.
- How do the management strategies for climate change incorporate sea level rise? There are several references to the protection of equipment and facilities within the 100-year floodplain and facilities at risk of storm surge. The Port Authority recommends reviewing the New York City Panel on Climate Change "Climate Risk Information 2013," which was released in June 2013. The best available sea level rise estimates for our area are established in this document, and are being used by New York City for planning purposes.

**Response:** The NPS notes and agrees with commenters on the need to adjust and adapt the management of parks like Gateway to the future effects of climate change. Climate change was a major consideration in developing the GMP/EIS and the final document incorporates the principles and policies of federal executive orders, DOI and NPS management policies, the *NPS Climate Change Response Strategy and Action Plan* and the *Hurricane Sandy Rebuilding Strategy*, released in August 2013. Pages 54-59 in the final GMP/EIS describe the approach that the park would take to mitigate and adapt to the effects of climate change during the next 20 years including management strategies related to natural and cultural resources, facilities and infrastructure. Some of these strategies include increasing coastal resiliency, reducing greenhouse gas emissions, conducting vulnerability assessments, and collaborating with academic partners. As part of GMP implementation, the park would continue to incorporate technical data and anticipated climate change impacts into natural and cultural resources management, visitor experience, and facility planning. Information is provided on shoreline and salt marshes on pages 60-61 as well as under individual park areas. Some ideas in the GMP may not be implemented over the next 20 years due to further evaluation of changing environmental conditions.

## Community Involvement

**Concern Statement:** Commenters expressed that NPS should increase communication with adjacent neighborhoods and involve community members more with planning and implementation efforts because of the community's knowledge of park resources.

Examples of comments:

- However, in achieving this goal I would strongly suggest that Gateway also needs to balance the privacy, autonomy and needs of close and adjoining neighboring communities with this mission and priority. This can only be accomplished via clear communication and transparency on all future action plans and close cooperation with their neighbors.
- Be sensitive to the environment and engage the people in the immediately surrounding area for their input as they have been the keepers of this gem.
- I believe that it is very important to have a large community involvement in the discussions of the alternatives. A lot of people in the civic association have lived here their whole life and will have a lot of insight into certain areas that will definitely help in this process.
- Please involve the many dedicated and knowledgeable naturalists who visit Gateway in both the planning and action processes. We are available to advise you, your staff and any consulting companies that are brought into the project on ways to maximize the Gateway Recreation Area and Jamaica Bay Wildlife Refuge for the benefit of wildlife in a way that is compatible with the recreation needs of the local and visiting human population.

**Response:** The NPS has been committed to community involvement in the general management planning process and will continue to provide opportunities for involvement during GMP implementation. As described in the History of Community Participation on pages 561-563, NPS reached out to the community in many ways during the planning process including hosting 34 information sessions and open house meetings at community locations and various park sites to gather ideas and comments on development of the plan, including management alternatives.

The preferred alternative has a strong focus on developing new connections with communities and park lands adjacent and nearby Gateway. As part of GMP implementation, the park will identify opportunities for greater community involvement in programming, stewardship and planning. In addition, as specific projects or facilities are planned, the park would continue to reach out for ideas and feedback. By working together with committed citizens, organizations, the academic community and other government agencies, Gateway can broaden public participation in determining how this new vision in the preferred alternative will be achieved.

## Cultural Resources and Management

### Ruins Subzone and Band

**Concern Statement:** Commenters stated that coastal defense structures and others resources should not be allowed to become ruins. In some cases, commenters made specific suggestions on what should be preserved, stabilized or allowed to go to ruins.

Examples of comments:

- We are concerned that a large number of locations, particularly a number of the significant concrete batteries from both the Endicott-Taft era and the World War II period, are apparently not included as core historical locations but are instead indicated as ruins zones.
- When viewing the NPS website with the draft GMP, we are concerned with Appendix B which set the priority on “Contributing Structures” within the park. This study creates a new status, called “ruin” for many coast defense structures. A structure with a “ruin” status may be removed or fenced off to keep from being a safety hazard and no work will be done to better the condition of the resource. We advocate that NPS should not let these historic resources become ruins.
- The creation of Gateway NRA in 1972 was based on the historic coast defenses of New York Harbor as without these former defenses there would be no national park. These historical defenses that range from our Colonial era to the Cold War were conveyed into the trusted hands of the NPS with creation of the NRA. Protection of these unique cultural resources was further recognized by the placement of many of these structures on the National Register of Historic Places as a National Historic Landmark, making them a historic property of national significance. Throughout its stewardship of Gateway NRA the National Park Service has recognizes its responsibilities for the preservation of these cultural resources through Section 106 of the National Historic Preservation Act (NHPA). The new GMP cannot revoke the NPS responsibility to preserve these unique structures for future generations and interpret them rather than allowing them to become non-accessible ruins.

**Response:** Gateway possesses more than 800 historic buildings, structures, landscapes and archeological sites. As described under the Planning Challenges section on page 16, many of these resources were inherited in poor condition when the park was created and the funding to repair and maintain these resources has never been sufficient. As part of the GMP process, the NPS underwent a systematic and extensive process to prioritize the 330 contributing resources in the park’s nine National Historic Districts and Landmarks (see pages 64-69 and Appendix B of the GMP/EIS). These historic structures and landscapes were evaluated for eight factors including current condition, National register status, potential use and vulnerability to future storm events. This process was undertaken to ensure the park was able to preserve those high priority resources, given logistic and financial constraints. Those resources recommended to be managed as ruins consist of structures in poor condition where one or more of the basic structural elements has been lost and due to this condition, are without viable reuse options (see Appendix B).

In order to meet its responsibilities under the National Historic Preservation Act, the NPS invited the New Jersey and New York State Historic Preservation Officers, the Advisory Council on Historic Preservation, the Delaware Nation, Delaware Tribe of Indians, and the Stockbridge-Munsee Community to participate in consultation on the development of a Section 106 (of the National Historic Preservation Act) Programmatic Agreement that outlines how Section 106 will conclude for the GMP and how it will proceed as the GMP is implemented.

These types of management decisions are not easy and the NPS is aware that visitors, specialists and even agencies are not in agreement on all decisions regarding which structures were placed in which categories; however, we believe our approach was data rich, systematic and involved all agencies and tribes that would be affected by the decisions. It is important to note that not all decisions are finalized; a key component of the new Programmatic Agreement is further reevaluation of those resources identified as ruins. Specific treatment of the resources identified as ruins will be determined through this Section 106 process.

### Prioritization of Contributing Resources

**Concern Statement:** A commenter stated that information on the prioritization of contributing structures should be clarified to reflect that it applies to both alternatives B and C.

Examples of comment:

It is only clear in reading through Appendix B: Contributing Structures Prioritization that those results are applied to both Alternatives B and C. That information is unclear in the draft GMP text itself, and should be included in the GMP if NPS publishes another for public review draft.

**Response:** Please refer to Chapter 2, Desired Conditions Common to Both Action Alternatives, page 54. The introductory paragraphs describe that the information in this section of the GMP will be taken under both of the two action alternatives. Actions affecting both alternatives B and C are presented as such in Chapter 4, Cultural Resources, beginning on page 456 and in Appendix B.

### Fort Hancock and Sandy Hook Proving Ground National Historic Landmark

**Concern Statement:** Commenters stated that the NPS should emphasize the greatest level of preservation and re-use of the Fort Hancock National Historic Landmark buildings and batteries. All batteries that will be stabilized and opened for visitor access at Fort Hancock need to be identified.

Examples of comments:

- I want to see the greatest level of preservation and re-use of the Fort Hancock National Historic Landmark buildings and batteries. There is tremendous energy and effort going on at Battery Gunnison to steadily augment what programming we can offer to park visitors. Support to others groups - historically-focused, environmentally-focused - needs to increase to bring Fort Hancock into its rightful place as a 'Top Tier' National Historic Landmark. The historic interpretation of Fort Hancock's military past is one of the two top components/mission of Gateway's enabling legislation.

- Fort Hancock's buildings and batteries should be preserved and/or adaptively reused by any means necessary.
- Since the buildings role has been fulfilled and they are no longer habitable, it's time to remove these decrepit structures and return this area to an open space for gatherings, picnics and relaxation for the public to enjoy. A public who have expressed their concern for the decline of the parks infrastructure as well as a demand for more picnic areas, benches, shade, bike racks ... Removing this small number of buildings would not diminish the historical significance of the area, nor will it address the remaining buildings in decay but would be a long overdue step toward the revitalization as a whole and would once again allow all to enjoy this beautiful area as it was before.

**Response:** The preservation of the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark is a high priority for the NPS. With over 100 structures and fortifications as part of this NHL, the NPS is challenged to preserve and maintain these resources. As part of the GMP process, the NPS underwent a systematic and extensive process to prioritize the contributing resources in the park's nine National Historic Districts and Landmarks, including both National Historic Landmark Districts at Sandy Hook. In addition, the Secretary of the Interior authorized a special federal advisory committee, the Fort Hancock 21st Century Advisory Committee, to identify appropriate future uses and redevelopment strategies for the buildings and cultural landscape associated with Officers Row, the parade ground and barracks that had been prioritized by NPS.

The NPS must make hard decisions about how cultural resources would be treated in the future. The planning team analyzed extensive data on current conditions and deferred maintenance that influenced the development of alternatives. In the draft GMP/EIS, the NPS wanted to be transparent about the challenges facing the park and the likelihood that some resources may need to be let go. Pages 64-69 and Appendix B of the draft GMP/EIS describe the NPS evaluation process for prioritizing 330 historic structures and landscapes. This process was undertaken to ensure the park was able to preserve those high priority resources, given logistic and financial constraints. These decisions represent the best evaluation at the time of GMP development and the final decisions on these resources may change. As stated on page 65, the NPS would continue to evaluate its historic structures and landscapes, especially for vulnerability to climate change.

As the GMP implementation proceeds, any proposed changes to the historic structures and landscapes that are contributing resources to the National Historic Landmarks would require further Section 106 consultation with the New Jersey State Historic Preservation Officer (NJ SHPO) and the Advisory Council on Historic Preservation (ACHP). As part of the GMP process, NPS evaluated and proposed that some of these structures should be considered ruins and might be removed from the landscape in the future (see Appendix B). A new programmatic agreement between the NPS, and NY and NJ SHPO will further define a process for determining if a historic structure would be preserved or removed from the landscape (see Appendix C). Upon completion of the GMP, the NPS will be consulting with the New Jersey SHPO to determine additional batteries to be stabilized, as well as their proposed uses.

Although this means not all of the National Historic Landmark is stabilized or preserved, those structures that are will meet the desired future conditions outlined in management zoning on pages 47-53 and Table 2-3 on pages 66-68.

## Maritime History

**Concern Statement:** The maritime history of the New York City area is an integral part of the cultural environment and must be considered.

Example of comment:

- One must also consider the well documented history of the geographic surroundings of GATE. The first Europeans in the NYC area, the Dutch explorers looking for a passage to Asia, and the following European settlers, all arrived by boat. The development of a water route that first opened the trans-Allegheny regions of North America to commerce via the Hudson and Mohawk rivers and the subsequent Erie Canal, again is all boat-related history. Then in the Revolutionary War, most of the battles in and around NYC were influenced by the availability of boats to move troops between Long Island, Manhattan and New Jersey. Finally as NYC developed into the largest seaport in the Western Hemisphere, it was again a boat based environment. For almost four hundred years, boats of all types have been an integral part of the NYC cultural environment.

**Response:** The maritime history of New York Harbor is important and was considered in the GMP. The NPS evaluated maritime resources within the park and areas outside its boundary and concluded that the primary fundamental maritime resources are located at the Sandy Hook Unit in New Jersey. The broader maritime stories of the New York Harbor area would continue to be part of interpretive programs and materials. Information provided in Chapter 3 regarding the historic development of the New York City area is presented as summary in nature with specific emphasis on maritime, aviation, and military history. This summary information guides the reader to more specific reference materials where greater historic detail can be obtained.

## Fundamental Resources

**Concern Statement:** Some commenters questioned why floodplains, wetlands and wildlife were not specifically listed as fundamental resources given their high value and importance.

Examples of comments:

- On page 364 of the Gateway GMP DEIS you write: "Floodplains are not identified as a fundamental resource or value." Why is that, since floodplains have such a high value in Federal and State law? Floodplains, along with wetlands, should be listed as a fundamental resource.
- On pages 12 and 13 of the draft GMP/EIS, NPS lists the fundamental resources and values of Gateway. Although NPS has acknowledged that the habitats of Gateway support a "rich biota that includes migratory birds, marine finfish, and shellfish, plant communities,

and rare; threatened, and endangered species”, no biota has been specifically named a fundamental resource of Gateway. While it is important to wildlife of all kinds, Gateway provides critical breeding, foraging, and migratory stopover habitat for many bird species and assemblages that are considered to be at risk. These species are charismatic megafauna, as valuable to Gateway as bison are to Yellowstone, and the Jamaica Bay unit.

- Chapter 4, page 428, line 13 - “No listed or rare species are also identified as fundamental resources by the park.” - While perhaps not meeting all of NPS’s requirements to fulfill the definition of a ‘fundamental resource’, these species should nonetheless be afforded the care and protection NPS would offer to a fundamental resource, due to their regional, national, or even global importance. Given that wildlife is explicitly mentioned in the enabling legislation, that wildlife viewing is explicitly named as a fundamental value, we strongly disagree with the decision not to also name wildlife as a fundamental resource for GNRA.

**Response:** At the beginning of the GMP process, the NPS carefully analyzed and considered the park’s legislation, Congressional Record and significant natural areas in determining its fundamental resources and values. NPS sought public feedback on the park’s fundamental resources throughout the planning process and distributed information in the Summer 2009, Fall 2010 and Summer 2012 newsletters.

A description and list of the park’s fundamental resources is included on pages 9-14. The NPS defines fundamental resources and values as “the park’s attributes - the features, systems, processes, experiences, stories, sounds, smells, opportunities for visitor enjoyment or others – that are critical to achieving the park’s purpose and to maintaining its significance. The significance statement related to coastal systems and natural areas is described on pages 11-12 in the GMP/EIS, and states that “Gateway contains an assemblage of coastal ecosystems formed by natural features, both physical and biological, that include barrier peninsulas, estuaries, oceans, and maritime uplands. The habitats that compose these ecosystems, so rare in such highly developed areas, support a rich biota that includes migratory birds, marine finfish and shellfish, plant communities, and rare, threatened, and endangered species...”

NPS chose to identify the coastal systems, natural areas and waters identified on page 12 as fundamental resources rather list the individual categories of resources, such as floodplains, wetlands or wildlife. A description of these resources is provided in chapter 3: Affected Environment. These areas are primarily included in the Marine, Natural and Sensitive Resource Subzone and would receive high levels of protection, monitoring and restoration.

## Natural Resources and Management

### Prioritizing Preservation Over Recreation/Visitor Use

**Concern Statement:** Numerous commenters stated that the preservation of wildlife habitat and open spaces should be the top priority for park management under the preferred alternative rather than recreation.

Examples of comments:

- Resource management should be given top priority in all parts of the Park. Recreation is important but is secondary to the parks proper management of natural resources.
- The park contains significant and unique natural resources from marshes, dunes, shorelines and developing woodlands in an area that is otherwise heavily urbanized. For this reason, the National Park Service should have protection and enhancement of resources as its overarching management objective. Recreational activities can still be enhanced and should be allowed and managed within this framework.
- I believe that it is the NPS's responsibility to ensure that natural habitat be preserved for generations to come. Please honor that commitment to preserve and protect Gateway.

**Response:** Preservation of Gateway's natural areas, wildlife habitat, open space and marine environments is a high priority for NPS under the preferred alternative. In the draft GMP/ EIS, more than 84% of the park is zoned in the Natural Zone, Sensitive Resource Subzone and Marine Zone under the preferred alternative. These zones provide the highest levels of resource protection, management and restoration.

The reasons why Congress established Gateway as a unit of the national park system are summarized in the Purpose and Need for the Plan on pages 3-4 and in the Foundation for the Future section on pages 9-10. The purposes for which Gateway was created are briefly stated in the establishment section of the park's legislation (also included in the GMP Appendix A): "in order to preserve and protect for the use and enjoyment of present and future generations an area possessing outstanding natural and recreational features.." Allowing visitor access and creating recreational or educational programs for them to experience and learn about the park's resources is in keeping with the park's legislation and overarching policy of the NPS.

The balance between preservation and recreation is a challenging task that Gateway managers continuously address and the NPS worked to strike this balance in the draft GMP/ EIS. Both the zoning and supporting narrative descriptions of the preferred alternative continue to support most of the current activities that occur in the park today, many in their current locations as well. In addition, the preferred alternative provides the addition of new community connections, opportunities and services, while preserving resources, which could enhance visitor experience in the future.

The desired natural resource conditions that the NPS will strive to achieve for all zones are described on pages 48-53 and on Table 2-2 on pages 62-63. In addition, the NPS will focus on improving conditions and management of the bay and oceanic waters including water quality enhancements and preservation of the estuarine shorelines, salt marshes, estuarine benthic habitats and estuarine and marine finfish and shellfish communities. A description of these proposed conditions and management actions are on pages 59-64. As part of GMP implementation, Gateway would continue exploring options with the New York City Department of Parks and Recreation (NYCDPR) and other partners to provide a



variety of recreational, educational and stewardship activities and programs. These options may include joint management with NYCDPR and providing services and facilities through concessioners and private enterprises as outlined in Appendix A.

The NPS believes the preferred alternative would protect the inherent integrity of the park's natural resources, processes, systems and values while at the same time providing meaningful and appropriate opportunities to enjoy them.

## Manage Park Areas for Natural Resource Values

**Concern Statement:** Commenters expressed concerns that specific areas in the park s should be managed primarily for bird and wildlife habitats and there should be no increase in recreational activities, such as camping and boating, in the preferred alternative.

Examples of comments:

- We oppose planned recreation activities for Big Egg Marsh, Canarsie Pol, and Hoffman and Swinburne Islands. Numerous species of waterbirds and shorebirds depend on these areas for nesting and feeding. Increased human presence and activity can bring nest abandonment and predation with reduced production in these very important breeding areas. These locations are not appropriate for recreation and should receive a high level of protection.
- Human activity such as boating, fishing, camping, picnicking, swimming, concession stands and walking off the main path are disruptive to the habitat and the precious birds and other wildlife which thrive in Jamaica Bay.
- The management plan should consider the threats and importance of Plumb Beach and include protective actions rather than development.
- In the face of growing visitation of our coastal areas, we believe the best way to continue that balance at Sandy Hook is not more development but a stronger commitment to natural resource protection. Sandy Hook also contains maritime holly forest and red cedar woodlands which are globally imperiled and provide important habitat for both breeding and migrating birds. Alternative B places "emphasis on high-intensity camping facilities 'including' an RV campground structural camping, and drive-in campgrounds," in and around these forested areas may require removal or alteration of these rare plant communities.
- Expansion of recreational facilities such as camping at the north end or water-based activities like kayaking and motor-boating in sensitive areas like Spermaceti Cove and Horseshoe Cove seriously disturb the wild life in these fragile areas. Although the Park Service may have designated some of these areas as out of bounds, it has been our experience that enforcement is lax and many people who use the Park are unaware of the detrimental effect of violating those restrictions. NPS needs to curtail expansion of recreational areas and to provide better enforcement for those areas which already exist.

**Response:** The NPS agrees that certain areas of the park should be managed to promote natural conditions and there should be appropriate recreational activities or restricted visitation to protect wildlife and habitat. The desired resource conditions and appropriate levels of recreation and facilities are defined under management zoning on pages 47-53 in the draft GMP/EIS. As part of USFWS consultation, additional information about conservation measures have been added in the final GMP/EIS. In response to USFWS and public comment, NPS changed some zones in certain areas for resource protection, particularly for sensitive species and habitat.

Numerous commenters expressed opposition to increasing recreation activities in the Jamaica Bay Wildlife Refuge (JBWR), citing concerns for bird and wildlife disturbance. The NPS notes and agrees with the idea that JBWR should be managed for wildlife and appropriate recreational activities. In fact, as noted in the draft GMP/EIS, 98% of the Wildlife Refuge was zoned as Marine, Natural or Sensitive Resource Subzone. The management of the JBWR would be very similar to current conditions in the preferred alternative. However, following public comment on the draft GMP/EIS, the NPS has elected to change the management zones from Natural Zone to Sensitive Resource Subzone and restrict visitation to all NPS managed islands in Jamaica Bay as it does now, except for portions of the main island that provide access to the visitor center and East and West Pond areas. In addition, a small area of Recreation Zone located over an area adjacent to the Cross Bay Boulevard that is used for fishing, kayak access and parking would be changed to Natural Zone to further restrict the types of activities that would occur there. In the final GMP/EIS, 100% of the JBWR is zoned Marine, Natural or Sensitive Resource Subzone. The portion of Big Egg Island not owned or managed by NPS (it is owned and managed by NYC) is anticipated to continue to be an interpretive and educational site to illustrate successful marsh restoration efforts.

For Plumb Beach, commenters expressed the value of the area for horseshoe crab, nesting birds and saltmarsh habitat and noted that these habitats should continue to be a high priority for protection and restoration instead of increasing recreation. Based on public comment and reconsideration of resource and safety issues, an area along the shoreline of Plumb Beach was changed from Recreation Zone to Natural Zone. A defined and improved path from the parking lot to the beach would help in keeping visitors from trampling vegetation or threatening the marsh at the site. Parts of the area would be restricted to visitation during horseshoe crab spawning periods. Existing beach uses would continue, but improved launch and spectator areas for wind sports would not be pursued. The NPS and NYC agencies would continue to improve the conditions of the building and adjacent parking and trail areas to control litter and activities.

Some commenters suggested that areas of the Staten Island Unit, including Crooke's Point, Great Kills Park and Hoffman Island should be rezoned to restrict recreational activities and provide more protection of wildlife or wildlife habitat. Hoffman Island has been changed from the Natural Zone in the draft GMP/EIS to Sensitive Resource Subzone in the final GMP/EIS which would restrict public access to the island. All of Crooke's Point would remain as a Natural Zone to allow for activities such as fishing, walking, wildlife observation and habitat monitoring and restoration. Certain areas at Great Kills Park that were zoned Recreation in the draft GMP/EIS were revised to reflect more desired natural conditions in the future. An area along the shoreline of Oakwood Beach was changed to Sensitive Resource Subzone to

promote habitat restoration. Additional areas of the Recreation Zone were converted to Natural Zone in wooded areas adjacent to Hylan Boulevard and around a freshwater pond adjacent to the Ranger Station. The remaining Recreation Zone will be retained to allow flexibility to shift recreational activities as environmental conditions change at the site. Some of these areas may ultimately be managed as a Natural Zone.

In reference to Sandy Hook, commenters stated that areas in this unit contain important wildlife habitat and species that are sensitive to disturbance and Sandy Hook provides particularly good habitat and the NPS should pay particular attention to protecting these species and their habitat. In the draft GMP/EIS, alternative B would zone the northern part of Sandy Hook in either the Natural Zone or Resource Protection Subzone and it would be managed as it is now except that habitat conditions and monitoring of sensitive habitat areas would be enhanced (see p. 92 of the Draft GMP/EIS). Following consultation with the USFWS under Section 7 of the Endangered Species Act, the park has agreed to expand the Sensitive Resource Subzone in the northern area, a change that will prevent even passive recreational use during nesting season. All camping, such as that under consideration at Batteries Kingman and Mills, would be evaluated through separate planning, data collection and impact analyses to determine whether they should be built and if so, how to design them so as to minimize or completely avoid impacts, such as those that may occur to wildlife. The park has also chosen to rezone the southernmost beachside coastal segment (south of beach area B) as Natural as it is in alternative C. Additional shoreline at Spermaceti Cove would also be rezoned from Natural to Sensitive Resource Subzone. These changes are combined with widespread increases in Sensitive Resource Subzone of interior forests and woodlands, coastal and bayside shoreline areas as shown in the revised map of alternative B. Although beach recreation will remain as it is now for the most part and concentrated human activity would also be located at Fort Hancock and any new camping areas, conditions for wildlife would be similar to what they are now. We believe the preferred alternative reflects a priority of resource protection at Sandy Hook.

## Impacts from Recreation, Facilities and Visitors

**Concern Statement:** Commenters remain concerned about the impacts of additional people, facilities, water-based recreation, infrastructure and increased access in the preferred alternative on rare species or species of special concern.

Examples of comments:

- Many of the planned infrastructural developments and changes in land-use associated with alternative B would be likely to degrade the condition of wildlife (including state and federally-listed species), vegetation; critical habitats, and natural resources throughout Gateway and will thereby ultimately diminish the potential for enjoyment of these resources by future generations. 'In all such instances, these adverse 'impacts are unacceptable, including occasions in which the adverse effects of a proposed action are considered by NPS to be "imperceptible".
- Campground siting adjacent to grassland areas will likely result in significant adverse impacts to sensitive grasslands as they may be perceived as "unused" land available for recreation. Alternative B does not address these adverse impacts, nor does it suggest mitigation strategies.

- Please provide specific information about how NPS plans to mitigate the adverse effects of camping on the backcountry environments

**Response:** The NPS shares concerns about the potential impact of improved or new recreational activities, such as camping or kayaking, which may bring increased visitation and disturb wildlife, plants and habitat. For the most part, recreational facilities are sited in the same location as they occur now or are proposed for already disturbed areas. Creating camping areas would increase the number of people as well as noise, odors and other indicators of human presence some species of wildlife avoid. However, these new facilities are unlikely to remove large areas of wildlife habitat as some are currently disturbed and/or already used for camping. Also, campgrounds would have the effect of concentrating visitors, which is less likely to have impacts to wildlife than even passive cross-country walking in wildlife habitat or walking on the beach near nesting birds for example. Trails would require removal of habitat, but are also known to keep visitors from walking across intact habitat, creating social trails or disturbing nesting or feeding wildlife a certain distance from the trail.

The USFWS expressed concerns about recreation and transportation systems on species of special concern such as the piping plover. NPS has consulted with the USFWS under Section 7 of the Endangered Species Act. During this consultation, changes were made to management zoning in specific areas of concern and conservation measures reiterated. Prior to the development of camping or other recreational facilities, additional site specific planning and impact analysis would occur. This site specific analysis would also include mitigation measures to reduce impacts and are outlined in Appendix C under the USFWS consultation letter.

### **Sandy Hook**

As described in the draft GMP/EIS, the beaches of Sandy Hook are used by the listed piping plover and seabeach amaranth (beaches) and several rare shorebirds. The vegetation in the interior of Sandy Hook is also rare and includes red cedar and holly woodlands. For all areas where piping plovers nest, all conservation measures already adopted by the park such as closures, fencing, predator control etc. (as described in NPS 2007a and NPS 2009e) would continue in any alternative. Holly forests would continue to be fenced and unavailable to the general public.

The draft GMP/EIS described impacts expected as a result of adding camping, trails or additional visitors (see pages 438-439 of the draft) and notes the most likely additional impact from alternative B on species of special concern would come from overnight camping on the beaches (in removable structures). These areas are identified as protected for piping plovers in plover management documents (NPS 2007a). The rezoning would allow camping and other recreational activities. Campers would not occupy habitat now used by these species, but could be on beaches that are adjacent to them or areas that would potentially be suitable for nesting. This source of human presence at night or in late evenings or early mornings as campers walk the area could disturb feeding birds or make existing habitat otherwise less desirable. The north end of Sandy Hook, which is also heavily used by nesting piping plovers is primarily zoned as "Natural," although an interior portion is Sensitive

Resource Protection subzone. The natural area for alternative B at Sandy Hook would be available for “a variety of natural immersion experiences to increase visitor awareness and enjoyment of the natural environments including nature study, wildlife viewing, camping, and instructional programming.” None of these has been specifically chosen to occupy the northern part of Sandy Hook. A multi-use trail to provide access from the bayside of Sandy Hook to the ocean side also has the potential to affect rare cedar woodland or other unique vegetative communities and will need to be cited properly to avoid these impacts.

A summary of changes to these zones to help in protecting piping plovers, seabeach amaranth and associated rare or state-listed species (such as least tern, for example) is provided. They include rezoning a larger portion of the north end as Sensitive Resource Subzone and thereby restricting visitor access; rezoning the Recreation zone proposed for the area south of beach area B and clarifying that any camping proposal along the coast that may affect piping plovers would be required to undergo additional analysis and consultation with the USFWS before it is approved; and closing the area south of beach area B during the plover nesting season. These changes would keep visitors from accessing known plover nesting areas by accident (as the actual nesting area would remain closed during March 15 to September 1 under existing management), would make deliberate entry less likely because additional area and buffers are protected and ensure camping does not disturb nesting birds. Impacts to feeding shorebirds may continue, but the degree of severity to species of special concern given these new conservation measures would be minimal; that is localized and adverse and would not be likely to be significant.

In addition to these impacts, camping facilities proposed near the existing camping area and on land surrounding Batteries Kingman and Mills as well as at Floyd Bennett Field or Ft. Tilden may require removal of vegetation that could be wildlife habitat. The sites at Sandy Hook are on already disturbed lands, although some vegetation/wildlife habitat may need to be removed. These lands are currently vegetated with successional maritime forest and/or northeastern modified successional forest. Although successional maritime forest is a relatively rare and natural vegetative community, northern modified successional forest is not (see pages 182-185 of the draft EIS for more information). The addition of camping areas would likely require the removal of some native vegetation, which could also be wildlife habitat for woodland species, a localized adverse impact. Impacts from using space at the batteries for camping are not likely to be adverse as vegetation here is disturbed and unnatural. Trails extending from the campgrounds and from the Fort Hancock area westward would need to be sited carefully to avoid rare vegetative and wildlife habitat communities as noted in the EIS (see pages 407-409 of the final GMP/EIS for example). Alternative B closes areas adjacent to the planned camping facilities at Sandy Hook to protect rare vegetative communities such as the Holly Forest or saltmarsh near Battery Arrowsmith as well as salt panne and tidal marsh. As noted above, closing any beach camping area during nesting season would greatly alleviate impacts to not only the plover but other associated shorebirds and vegetation.

### **Jamaica Bay Wildlife Refuge**

For the Jamaica Bay Wildlife Refuge, the GMP/EIS (pages 430-431) notes at least two species of stated- listed wading birds, several state-listed shorebirds (least tern, common tern and

black skimmer) and the majority of 25 osprey nests in the Jamaica Bay Unit use island or saltmarsh shoreline habitat in Jamaica Bay for feeding, resting and nesting, as does the diamondback terrapin, a species of management concern for the park. Several rare or state-listed plants also occupy marsh, mudflat or wet sandy environments on islands in the bay. The EIS notes that these species benefit by the park policy of keeping islands visitor free as well as efforts by the NPS, Army Corps of Engineers, New York City and other partners to restore marsh habitat, an action common to all alternatives but expanded in alternatives B and C. In the draft GMP/EIS, alternative B includes the possibility of allowing visitors at Canarsie Pol or Big Egg Island, zones shorelines of Ruffle Bar and Little Egg Island as "Natural" (rather than protected subzone, with the possibility of visitor access) and designates a water trail established in the bay for non-motorized use. The impacts of these actions are described in the draft EIS (pages 416 and 421) and include energy loss, lowered nesting success, and susceptibility of eggs and chicks to predation and cold weather. These impacts are described as potentially significant. Because of the potential for significant impact to nesting birds, the NPS has decided to zone all Jamaica Bay marsh islands as Sensitive Resource Subzone, which would restrict visitor access. The main island that includes the Jamaica Bay visitor center and parking would still retain a combination of Natural Zone and Sensitive Resource Subzone to allow access to areas such as the West Pond. The portion of Big Egg Island managed by New York City would continue to be available for use as an educational and interpretive location to illustrate marsh restoration techniques. With these changes to visitation at the Jamaica Bay Wildlife Refuge, impacts to nesting wildlife of concern are less likely to be significant.

### **Floyd Bennett Field and Fort Tilden Grasslands**

Commenters noted that the location of recreational activities and facilities at Floyd Bennett Field and Fort Tilden would disturb grassland birds and diminish habitat. The draft GMP/EIS (pages 430 and 435) notes that stated listed plants, birds (horned lark, upland sandpiper, savannah sparrow and northern harrier) and the rare checkered white butterfly occupy habitat in grasslands at Floyd Bennett Field and/or Fort Tilden. The numbers of some of these species, particularly horned larks and upland sandpiper, have fallen dramatically in New York in the last few decades, primarily because of habitat loss. As the draft document (page 435) notes, locating campgrounds or recreational facilities in the vicinity would concentrate visitors interested in the outdoors, who may be likely to hike through or investigate the grasslands as part of their exploration. The same is true at Fort Tilden, where both action alternatives anticipate some camping and educational or recreational use of habitat. Parking along runways at Floyd Bennett Field for large events could disrupt movement by listed birds from one area of the grasslands to another. These impacts are characterized as localized and adverse in the draft EIS.

Under the preferred alternative, no facilities are planned to be located on or adjacent to grasslands at Floyd Bennett field. The current grassland habitat between the runways and taxiways would become part of the Historic Zone. To retain the historic character of the open pattern of the airfield landscape, NPS would maintain low vegetation, such as grasslands for wildlife habitat. It is true that additional visitors and, in particular, campers could disturb

natural resources and even displace wildlife. Campers or day visitors could roam widely across the area the grassland area at FBF, crush vegetation or frighten wildlife away. These impacts are discussed generally in chapter 4 of the EIS in the vegetation, wildlife and species of concern sections as is appropriate in a programmatic document. Measures to mitigate these impacts could include seasonal or geographic restrictions, designated trails, signage and the periodic relocation of backcountry campsites if monitoring shows impacts from trampling. NPS would evaluate the potential for additional grasslands as further planning studies for Floyd Bennett Field are conducted

### **Hoffman Island**

For Hoffman Island, commenters were particularly concerned about disturbing feeding or breeding birds by allowing visitation to Hoffman and Swinburne islands. Alternative B would have kept Swinburne Island closed to visitation, but NPS would have explored the feasibility of developing a dock on Hoffman Island in order to allow visitors on the island. The draft GMP EIS summarizes impacts of human disturbance on colonial wading birds, which nest in the spring and rest and feed at other times of the year, and harbor seals which use Hoffman Island as a haul-out area in the winter. Bird species include a variety of herons, ibis and egrets, some of them state-listed. Recreationists can disrupt foraging, social behavior, feeding animals and communication, as well as cause energy losses and reduced nesting success in some species. Birds nesting in dense colonies like those on Hoffman and Swinburne Islands can be particularly vulnerable to disturbance. The adults change their behavior and expend energy in vigilance, taking flight or other actions that drain reserves. They also leave the chicks or eggs vulnerable to predation or cold weather when they take flight. The distance at which a bird flushes varies between individuals, but also tends to vary among species. More sensitive species flush when people or boats are further away; this group includes many of the species at Hoffman and Swinburne Islands. Harbor seals are also easily disturbed by humans. The EIS concludes that current management has offered substantial benefits to these species from keeping Hoffman and Swinburne Island free of visitation and that alternative B may result in significant localized adverse impacts from allowing visitation to occur. As a result of these possible impacts and concerns expressed by the public, the NPS has chosen to continue to keep Hoffman Island closed to visitation. Hoffman Island has been changed from Natural Zone to Sensitive Resource Subzone in the modified alternative B. The impacts anticipated under alternative B in the draft GMP EIS would be greatly reduced as a result of this change. Swinburne remains a Sensitive Resource Subzone without visitation.

### **Water-based Recreation and Transportation**

Specific to water-based recreation and transportation, the primary concern noted by commenters is the proposed new launch sites on the bayside of Sandy Hook, although some concern over kayaking or other water sports in Jamaica Bay when close to marsh habitat was also expressed. The impacts of allowing even non-motorized watercraft to approach nesting waterbirds are analyzed in the final GMP/EIS (see pages 421-425 for example). If combined with visitation as described above, the impacts to some colonial waterbirds nesting success could be significant. However, also as noted above, the NPS has decided to close Hoffman Island in the Staten Island Unit and all marsh islands in Jamaica

Bay wildlife Refuge. Alternative B continues to include a water trail that “hugs the shoreline” of Jamaica Bay islands and refuge shoreline, as well as water trails and guided tours to facilitate paddling from Fort Wadsworth down the coast to Miller Field and Great Kills Park. Leading kayakers or other non-motorized boats along designated water trails has the potential to alleviate impacts from visitors coming too close or actually stopping on islands, as non-motorized boats without guides are currently allowed in both Jamaica Bay and in Lower New York Bay between Hoffman and Swinburne Island and the coast of Staten Island. Water trails that “hug” the coastline in either of these locations has the potential to disturb nesting birds to the same or even greater degree than visitors on foot. The draft GMP/EIS (see pps 421-422) summarizes literature on flushing distances in birds approached by non-motorized boats.

Impacts from boat launches would be similar to any other visitation on land, except that visitors will be concentrated in a particular area and wildlife, including any species of special concern, would likely be disturbed enough to avoid it. The deliberate location of water trails adjacent to islands where nesting could be ongoing is likely to have substantial adverse impacts on energy reserves of adults and nesting success for some sensitive species. As noted in the draft GMP/EIS, these impacts could be significant. Impacts to wildlife feeding or resting along the bayside shore of Sandy Hook are likely to be similar to what they are now with potentially more boat traffic as launches are cited in this park unit; that is, adverse but not significant unless nesting is disturbed.

At Sandy Hook, recreational kite surfing on the bayside (including Spermaceti Cove and Plumb Island) has been observed to scatter feeding shorebirds and pets have had substantial impacts on shorebirds, nesting terrapins and spawning horseshoe crabs. These impacts have led the park to restrict access to these sensitive areas. As described in the draft GMP/EIS, Spermaceti Cove in alternative B would have been zoned “Natural” to allow boat launches and other activities. However, following consultation with the USFWS, the park has chosen to maintain most of Spermaceti Cove as a Sensitive Resource subzone and close it to visitor use as it does now. Although it is not contemplating a buffer for non-motorized boat use near sensitive nesting sites as part of the GMP, the park is going to consider the possibility in its future planning, notably the Marine and Estuarine Resources Management Plan.

Given these factors, impacts to wildlife at Sandy Hook from Alternative B are not largely different from those occurring now (e.g. compared to the No Action alternative) and are not likely to be significant. Additional planning and analysis required to create campgrounds here or in the Jamaica Bay Unit of the park (at Floyd Bennett Field or Fort Tilden), and mitigation to prevent use of grasslands or other important habitat at all adjacent locations would keep impacts to wildlife at these locations from becoming significant. Buffers for water trails or closures during breeding and nesting seasons would also substantially mitigate impacts to wildlife on islands in Jamaica Bay and Hoffman/Swinburne Islands.

### Cumulative Impacts to Wildlife

**Concern Statement:** Commenter disagrees that the contribution of an imperceptible cumulative impact is accurate or acceptable.



Example of comments:

- Chapter 4, page 422, lines 29-32 - "... [A]lternative B would have the potential for more intensive contributions to adverse cumulative impacts from habitat loss associated with increased development, such as at Fort Tilden or Sandy Hook, or from allowing visitor use of marsh islands or Hoffman Island, than alternative A." – Because of existing cumulative adverse impacts, wildlife in GNRA are extremely vulnerable to additional adverse impacts. Even "small" impacts can have significant cumulative impacts that may rise to the level of impairment. How will NPS monitor these impacts?
- Chapter 4, page 422, lines 38-40 - "Adverse impacts from alternative B are unlikely to be more than imperceptible compared to existing cumulative adverse impacts on wildlife." This statement is inaccurate. In light of existing cumulative effects and the complex and emergent nature of ecological systems, a seemingly 'imperceptible' adverse effect may be substantially amplified. We find it unacceptable that NPS is willing to accept such effects, considering the fact that a seemingly 'imperceptible' effect could very well be the "straw that breaks the camel's back" for biotic communities.

**Response:** NPS continues to believe that impacts of any changes proposed in the action alternatives would add no more than an imperceptible adverse impact to the already significant cumulative impacts wildlife in the New York City region experience from urban development and the presence and activity of humans. The analysis of cumulative impacts is commensurate with this contribution. The analysis of impacts to wildlife was based on review of scientific literature, professional knowledge of park staff and consultation with USFWS. NPS acknowledged that the analysis was programmatic, meaning qualitative rather than quantitative; however, we believe that the analysis was based on adequate information and that our prediction of the intensity of impacts and contribution to cumulative impacts is reasonable. Further, management zoning changes were made to the preferred alternative at sites such as Sandy Hook and Hoffman Island that further protect wildlife and sensitive ecosystems as noted in chapter 4 of the final GMP/EIS on pages 419-425. These changes have reduced the intensity of the direct and indirect impacts of alternative B, which also reduces the contribution to cumulative impacts.

## Jamaica Bay Wildlife Refuge - East and West Ponds Management

**Concern Statement:** Numerous commenters expressed support for filling the West Pond breach caused by Hurricane Sandy and restoration of both the East and West Ponds, citing habitat diversity provided by fresh water bodies and recreational opportunities afforded by the ponds and trails; however, some commenters noted that West Pond would be more valuable as saltmarsh habitat that could support native species.

Examples of comments:

- There is a pressing need at present for the recent breach in the West Pond to be repaired, with the eventual objective of reducing the Pond's salinity to the level it had been in the past, when it had supported freshwater plants and animals.

- I would like to see JBWR, both East and West ponds, restored to its originally intended purpose. In addition to supporting wildlife, which needs all the support it can get, it provides an invaluable asset for education in natural ecosystems and conservation.
- I am not one of those who believe that fixing an artificial fresh water West Pond is the best thing to do even though it is an important resource and would maximize diversity. I actually think that allowing it to revert to an expanded salt marsh would be a much more valuable management strategy as long as native species are emphasized in the regrowth of the marsh.

**Response:** NPS recognizes the importance of the East and West Ponds for bird habitat and the accompanying trail for walking and wildlife observation. As noted in the GMP/EIS, the breach in East Pond was repaired very soon after Hurricane Sandy. As part of Hurricane Sandy recovery efforts, the NPS is undertaking additional planning and compliance, including an environmental assessment, to determine the impacts of the salt water intrusion, and explore options for public access and restoring the freshwater West Pond. Following the executed GMP record of decision, the public would be invited to participate in the planning process, including public meetings, to discuss ideas and concerns as part of scoping and review of the draft environmental assessment, including alternatives.

## Mitigation Measures

**Concern Statement:** Commenters questioned the effectiveness of mitigation measures in the EIS that suggested that creating or restoring plant communities in other locations make up for adverse effects of degradation from increased visitation or facilities.

Examples of comments:

At numerous points throughout the environmental impact statement of alternative B, the National Park Service has acknowledged that certain actions are likely to result in the degradation of plant communities and habitats. However, it is suggested throughout the document that these losses would be mitigated by the creation and restoration of plant communities and habitats elsewhere in the park, and that any adverse effects will be rendered inconsequential. It is incorrect to assume that restored or created habitats can attain comparable ecological function to the original habitats, nor is it appropriate to claim that the restoration of one habitat type nullifies the adverse impacts associated with the destruction of a different habitat type.

**Response:** In fact, the EIS is quite careful not to suggest any offsetting effect in the analysis of impacts of each alternative. The expansion of coordinated research and restoration efforts for saltmarsh are important beneficial effects on this vegetative community in both action alternatives (see pages 371-372 in the draft EIS). Creation of fresh and saltwater wetlands at Floyd Bennett Field, comprehensive study and planning effort to maximize freshwater wetlands and increased efforts to restore wetland vegetation by removing invasive species are efforts common to both action alternatives which have the potential for significant benefits. The effects of increased visitation and camping and other facilities are described on pages 404-409 in the final GMP/EIS and are characterized as localized and adverse. As an example, the "Conclusions" paragraphs end with the following

“In sum, Alternative B would have significant beneficial impacts on park vegetation and localized adverse impacts that would require careful planning to prevent them from becoming significant.” Note there is no attempt to suggest the beneficial impacts offset any localized adverse effects of increased visitation.

## Park Operations and Management

### Enforcement and Safety

**Concern Statement:** Commenters stated concerns that increasing the number of visitors in the park would lead to resource damage or public safety issues. Commenters also noted that currently some areas of the park are not adequately maintained or patrolled to be safe.

Examples of comments: need more quotes about safety

- Increased public attendance without increased supervision, which seems unlikely as Park budgets/ rangers have continually been reduced, would cause greater damage.
- No conceivable enforcement plan that could adequately protect the beach-nesting birds there, including NJ’s highest density of the federally endangered Piping Plover, from kids, dogs, high pedestrian traffic, and vandalism
- Chapter 4, page 507, lines 28-33 - “Alternative B would greatly increase the diversity of recreational opportunities offered throughout the park and encourage wider visitation and participation by the local and regional population, including those that are not traditional park visitors. The expansion in recreation and visitor use opportunities would be expected to result in an estimated 5 to 10 percent increase in annual visitation over the course of 15 years. This could mean 450,000 to 900,000 more visitors a year.” - It is unrealistic to be able to serve an additional 450,000 to 900,000 visitors without significant increases in enforcement, public safety, and public services. Also, to ensure that recreational activities do not impair fundamental resources increases.
- The Ft. Tilden area, in particular is not at all well maintained and with an increase in visitors will pose sanitation and/or pest problem as well as safety concerns. The lack of maintenance and safety hazards in the Ft. Tilden area needs to be addressed as they are unsightly and unsafe.
- I feel that motorized recreational vehicles should be vastly curtailed within the park in order to decrease erosion and pollution of the entire area - Water and land. The bay and harbor are particularly dangerous areas to allow boating due to commercial traffic. In fact, all of NYC harbor should be forbidden to private recreational Watercraft. Land areas should be dedicated to either pedestrian or bicycle, perhaps trail bike, access. This will create the least erosion, cleanest air, and least disturbance to the wildlife.

**Response:** Management strategies for elements of the alternatives to accommodate additional visitors or expansion of recreational opportunities are yet to be confirmed. The User Capacity Indicators and Standards section on pages 125-128 describes how NPS will guide the types and levels of visitor use and monitoring of desired resource conditions

in the park. As part of GMP implementation, Gateway would update operational plans should visitation or other conditions change. These plans could include the Wildland Fire Management Plan, Structural Fire Management Plan, Emergency Operations Plan, and Hurricane Plan, to name a few. Updating these plans would require continued coordination with local law enforcement, fire departments and other visitor safety and resource protection agencies. In addition, park management reviews and adjusts its annual seasonal staffing plan to meet visitation or resource protection needs. As described on page 133, the types and numbers of positions for maintenance, resource management, visitor and other park functions would likely change as the preferred alternative is implemented. A number of actions in the preferred alternative will require major partner contributions and/or cooperation by other entities to be accomplished. They include partnering with New York City, private sector partners/ concessioners, use of volunteers and non-profit organizations as noted on pages 548-553 of the draft GMP/EIS.

The GMP EIS recognizes there are potentially dangerous situations that occur from accidents, the remoteness of some areas, user conflicts and unauthorized access. However, neither alternative B nor C is expected to increase threats to visitor safety. For example, deteriorating structures would be removed or stabilized and increased enforcement presence throughout the park lands would improve response capabilities for park staff and lend reassurance to visitors. Both alternatives would include carefully controlling construction sites and resource restoration sites with fencing and monitoring to prevent adverse impacts on visitor safety. This information is on pages 492-497 of the final GMP/EIS.

The emphasis in the GMP is on increasing human propelled boat use while maintaining marinas and other facilities needed for motorized boat users. Safety considerations include designated water trails relatively close to shore that would be clearly signed to alert all boaters to the presence of non-motorized boat users. Opportunities for water-based recreation would be substantially expanded, including enhanced marinas at Great Kills Park and Floyd Bennett Field, designated water trails, mooring fields, additional launch sites and more instructional programming, equipment rentals and fishing access. As noted in Chapter 4, Visitor Use and Experiences under Health and Safety, safety hazards associated with boat use would be mitigated through improved marking and the designation of water-based recreational use areas. Furthermore, additional guided tours and instructional programming for self-propelled watercraft use will ensure more visitors are educated about the Gateway waters and informed about commercial boat traffic on the bay and harbor. Overall, it was determined that expanded access to and enjoyment of Gateway's waters, beaches, and coastal environments would result in a substantial long-term beneficial impact to the visitor experience of Gateway.

## Staffing and Budget

**Concern Statement:** Commenters indicated additional natural resource management, Jamaica Bay Wildlife Refuge, and/or NPS rangers or other enforcement staff need to be added to be able to protect resources and visitors as more people come to visit the park. Commenters are concerned about possible fees and the cost of implementing alternative B is higher than the park is likely to be able to manage given past NPS funding deficits.

- Jamaica Bay is a large 13,000 acre body of marsh, shorelines, uplands and open water. Currently no one is patrolling the open waters of Jamaica Bay which is most of the park. Each year we find many illegal crab traps, people on the nesting bird islands, horseshoe crab poaching, people netting huge numbers of small fish, etc. The park needs to invest in a patrol boat and a work boat for Jamaica Bay to educate the public and enforce regulations.
- Hire scientists, naturalists, biologists to manage the park, not just park rangers who provide education.
- The National Park Service must make a firm commitment of money, staffing and other resources to the protection and enhancement of the park's natural resources, especially in Jamaica Bay.
- The goals of alternative B seem overly ambitious considering the current state of resources and structures and budget. If they are going to be accomplished will there be a budget for maintenance as maintenance not only of buildings but of resources is clearly a huge issue already for this park.
- The ambitious development under proposal B worries me as it seems that the Park will offer the same sort of recreational activities offered by other commercial businesses in the area. It will flood the park with these pleasure seekers and will offer activities that people will have to pay for, like, say the right to enjoy things like boating and kayaking and camping. That will not only destroy the natural beauty of the area but lock out the people who may not have the means to enjoy these activities.
- The recreation proposals all seem to be aimed at commercialization of GNRA for the benefit of vendor/partners and those who can afford to "pay to play". GNRA must serve those who cannot afford to pay more than the bus fare to get to Floyd Bennett Field. It should not become a country club parceled out to sports vendors.

**Response:** NPS recognizes and explains in the draft GMP/EIS (see page 549, for example) that neither alternative B nor C could be fully implemented without partners. Across all three units of the park, partners would play an increasing role in supporting park cultural and natural resource management, facility rehabilitation and restoration, and even maintenance, that could not be accomplished at the levels proposed in alternative B or C without partner funding and volunteer efforts. This would help to eliminate duplication in the NYC and NPS management responsibilities and presumably would lead to reallocation of budget and staff. If the NPS and its partners agree that additional resource management, scientists, enforcement of resource protection rules or visitor safety are in need of additional staff, some of the reallocated personnel and budget would be added to these divisions. Continuing on pages 551-553, the actions of partners to develop revenue-generating visitor and recreation programming in combination with eliminating duplication between the maintenance and resource management staff at both New York City and the park would free up funds to allow features of either alternative B or C to be implemented over time. Activities that are free now are very likely to remain so in the future. However, some new activities or facilities, such as entrance to the new Wetland Center, camping, balloon rides at Floyd Bennett Field etc. would be fee-based.

## Recreation Management

**Concern Statement:** Some commenters prefer no active recreation in the park, some commenters want uses more relevant to community interests and others state that low-impact activities would be the proper balance.

Examples of comments:

- My suggestion would be for more focus on low-impact and passive recreation such as walking, birding, butterflying, nature study, stargazing, swimming at currently designated beaches, canoeing and kayaking, maybe sailing (but NOT wind-surfing and kit-boarding which are very disturbing to birds- they take flight from what appear to be fast-moving large winged predators), community gardens, art and theatre projects, limited horseback riding, and quiet contemplation of nature.
- Promote additional recreation within the park and in nearby areas. Gateway NRA must be MORE relevant to today's communities
- There should be NO active recreation. There should be no camping, hiking, biking, fishing, boating or concessions. All recreation should be passive observation of the wildlife.
- Finally, we don't believe that resource management and public engagement are mutually exclusive options. Recent developments at Jamaica Bay, such as the announcement of a Science and Resiliency Institute, are proof that the Park Service's stewardship and public engagement objectives can be creatively combined.

**Response:** In developing the GMP alternatives, the NPS gave serious consideration to the levels and types of recreational activities and appropriate locations in the park and defined these uses in the draft GMP/EIS and the preferred alternative. Alternatives do differ in the type and extent of recreational opportunities. Each alternative offers a variety of visitor experiences, including the opportunity for solitude or quiet contemplation, walking or bird watching as well as more active programming or activities.

To inform the GMP process, the planning team relied on three primary sources of information to guide proposed recreational activities: the results of public scoping; a synthesis of visitor use and trends over 35 years; and recreation demand and use analysis. Under the History of Community Participation on pages 561-563, the results of scoping are described including the types of activities and experiences people thought were important for the planning team to consider. In addition, The Pennsylvania State University's Department of Recreation, Park and Tourism Management synthesized findings from past visitor studies and analyzed area demographics and projected trends. This synthesis included visitation and types of activities that people favored in the park. Information about visitor use and activities is described on pages 251-265 in the draft GMP/EIS. To better understand current and future activity trends, a recreation demand and use analysis was conducted that evaluated 37 current and proposed recreational activities within the park and at nearby parks.

The management zones described on pages GMP 48-53 provide for three specific active recreation zones where appropriate activities and facilities would be concentrated – Recreation Zone, Active Beach Subzone and Community activity subzone. These three zones combined equal less than 10% of the total park acreage and have the highest levels of use, especially during summer months. Most of these recreational uses occur in the same location as they do today or will be shifted to other appropriate areas such as Floyd Bennett Field.

The biggest change in recreation use was the increase in camping opportunities. The GMP describes on pages 69-74 the different types of camping that will be explored throughout the park. Before these new camping areas are developed, additional planning and compliance will be undertaken to analyze how to design them so as to minimize impacts on habitats and wildlife. Prior to increasing facilities or access areas for non-motorized boating, the NPS will prepare a marine and estuarine resource management plan which will identify and evaluate the types and levels of marine recreational use. Recreation uses in park waters are already regulated under the park's Compendium and restrict personal watercraft (i.e. jet skis).

The NPS believes that this systematic approach created two alternatives that both show an appropriate balance between recreational uses and resource protection; that is, each meets the NPS obligation to both conserve and provide for enjoyment of park resources and values.

## Site Specific Analysis and Data

**Concern Statement:** Numerous commenters addressed very specific concerns, made very specific suggestions, or requested site-specific data and analysis related to proposed recreational facilities and transportation in the preferred alternative as well as projects occurring outside park boundaries.

Example of comments:

- You should show current public use data by park sub-unit, by activity.
- You write: "Alternative B proposes expanding current pathways, adding water-based recreation and some introductory camping opportunities, and rebuilding the marina (damaged by Hurricane Sandy) into a water-based recreation facility in a different portion of the harbor. Ferry service may be added." (GMP DEIS, p. 340). While the concept of a water-based public recreation facility, open to the general public, in either Alternative B or my preference, Alternative C, sounds interesting, this would require an engineering feasibility study, which to my knowledge has not been done. Also you would need to consider the impact on vistas and view corridors
- While there is some verbal discussion about longshore transport of sand at Great Kills, there is no map showing the amount and vectors of that flow and no calculations or estimates of deposition 10, 20, 50, and 100 years into the future. In the case of Great Kills, mention is made (p. 150, p. 334) of the Oakwood Beach sewage treatment plant subsurface outfall pipe and its effects on sand transport but it is never shown on any map. On page 150 it is referred to only as a "very long outfall pipe." How long is it and where exactly is it located and where does it terminate?

- Runoff coefficients and runoff characteristics are environmental impacts that have to be accounted for if you are planning to increase paved or grassed area, or change the topography. How much more runoff can we expect under Alternative B as compared to Alternative C, and how will that runoff be pre-treated before discharge, as is required under NPDES regulations?
- Maybe I missed it, but I could not find any vegetation entitation data or maps. In a coastal estuarine region where we are on major avian and insect migration paths, and also so urbanized, ANY remaining vegetation or sites that could be revegetated are important. Your DEIS provides no statistics on acres that would be affected under the Alternatives. What exactly is the impact? How many acres of currently shrub or even phragmites areas be paved over or grassed over under your preferred Alternative B?
- While there is a lot of general textual discussion of wetlands, you cannot do a good analysis of any proposal without wetlands maps (State & Federal (NWI) ) shown overlaid on an aerial image and maps/plans, and a list of acreages. Only 8% of the land on Staten Island is freshwater wetlands. Most are New York State Class I wetlands. They are also Federal (NWI) wetlands. The rest of the City is <1% iredulated wetlands (0% in Manhattan). [NYS wetland statistics by county: [http://www.dec.ny.gov/docs/wildlife\\_pdf/wetstats3.pdf](http://www.dec.ny.gov/docs/wildlife_pdf/wetstats3.pdf) ] Regionally, 95% of the wetlands that existed at the time of the first colonial settlement are gone.
- In any coastal park, an understanding of flood zones and how that might impact planning and project site selection is impossible without showing the flood zone maps overlaid on park aerial images and the plan maps.
- Please provide an analysis of the flotsam and jetsam on the beaches and in the adjacent wetlands: the small and large debris, including beverage containers, tampon applicators, boating and fishing debris, etc. How much, what it consists of, where are its sources, which entities are responsible. Provide an analysis of how this impacts the recreation choices of current and prospective park users, how much it costs to clean up, effects on wildlife, etc. It certainly has an impact on park users and park management planning.

**Response:** While we have reviewed and acknowledge these comments, NPS notes that this GMP/EIS is a programmatic document that focuses on zoning and large scale changes and their potential impacts to resources and values. The level of analysis in the GMP/EIS is deliberately ecosystem wide and programmatic and is intended to evaluate the relative impacts of different directions in an alternative and give a broad idea of the resources that might be affected. A variety of data was used to inform the management zoning, desired future conditions, alternatives, affected environment, and impact analysis presented in the draft GMP/EIS as evidenced by the extensive bibliography, including over 300 references on pages 685-700. These documents and geospatial data sets were reviewed and analyzed during the planning process. The relevant information was summarized and/or incorporated by reference and the specifics were not included in order to reduce the bulk of the draft plan nor was it necessary for the broad level of decision-making of a GMP.



When pieces of these alternatives are ready to be considered for implementation, the NPS would complete needed site specific feasibility, cost and environmental studies to determine how best to build a facility, improve transportation infrastructure or design new recreation areas, such as campgrounds. In addition, consultation and compliance with state and federal agencies would also occur. Relevant site specific data and maps would be included in these planning and compliance documents for public review and comment.

## Traffic and Transportation

**Concern Statement:** Commenters noted that improving alternative transportation options, including ferries, would help improve access to the park. Other commenters remain concerned that attracting additional visitors and vehicles would increase traffic congestion and prevent access for emergencies, especially in adjacent communities.

Examples of comments:

- The influx of public transportation only causes added congestion in an area where residents only have one road in/out of their community where they LIVE. This is of concern should there be a mandatory evacuation in the future.
- The safety hazards associated with increasing visitors to the Breezy Tip would also present themselves at Riis Park. The vehicles which block the access roads to the bridge also block the only road that allows traffic to pass by the bridge. These delays have prevented emergency vehicles from responding to emergencies west of the bridge and on the bridge.
- There is also only one road and passage from Fort Tilden in and out of Breezy Point and to the extreme Western tip of the peninsula. The increased traffic flow along with obvious additional parking needs bring real potential concerns and problems relative to the overall safety and security of our community. It also raises issues and concerns relative to any necessary evacuation of our community in the event of another significant storm.
- All changes have to be studied to ensure that Sandy Hook is not being over-developed, resulting in even more crowded situations.

**Response:** Improving park access and alternative transportation are key planning challenges that the GMP addressed. Under the preferred alternative, a variety of options to, from, and within Gateway's sites would be available. Public access to and within Gateway would be made convenient through a combination of public transit, ferry services, and non-motorized modes such as walking, biking and human-powered boats. While visitation would likely increase, the alternatives strive to reduce visitor dependency on personal automobiles by providing a number of alternative transportation options. Throughout the park, expanded ferry and water taxi use, shuttles as well as improved connectivity and enhanced bike and pedestrian -friendly infrastructure would provide visitors with car free options for both getting to and through the park.

To the extent possible, existing infrastructure including entrances will be used. Access to park units will be improved substantially by the introduction of new signs and better wayfinding and limited development of new egress and ingress. Signs, orientation kiosks and more welcoming entry points will raise the visibility of Gateway's park units and keep visitors from inadvertently traveling to communities instead. Additionally, by improving connectivity between the park units and surrounding communities with greenway connections and new trails, the NPS and its partners hope to reduce auto-dependence among visitors and make it easier for more people to enter the park units on foot or by bike. The specifics of routes into or out of a particular area are something that has not yet been decided. Future decisions about access and routing will be made in coordination with local community planners and the NPS.

In order to achieve this goal, NPS would explore these options with transit, transportation and planning agencies and organizations for expanded routes, services and physical connections. Gateway would utilize existing facilities such as marinas, docks, trails and road network as the foundation for an improved transportation system so that less of the park's resources would be disturbed. Prior to expanding or developing services and facilities, additional planning, consultation and compliance would be undertaken.

To continue to provide emergency service, the park would likely continue to use routes that have proven successful. In addition, the NPS will continue to update its emergency response procedures in subsequent, more site-specific plans than the GMP. Through step-down transportation and safety plans, NPS and local emergency services will analyze access and ensure they gain access to park units to address emergencies.

In the transportation section of chapter 4 in the final GMP/EIS on pages 511-540, the analysis demonstrates that the introduction of several alternative transportation options (e.g. shuttle, water taxi use, ferry, bike infrastructure) would reduce reliance on private vehicle access to the park and minimize impacts associated traffic congestion and overfilled parking areas. Even if parking is designed to meet the carrying capacity identified for a site, a sudden influx of visitors arriving by boat or bus could overwhelm the site and exceed its capacity. Therefore, when planning the operation of these transportation modes, the NPS would consider visitation surges at particular sites in order to avoid exceeding the area's carrying capacity. Impacts to the visitor experience at Gateway were analyzed in chapter 4 of the EIS in the Visitor Use and Experience section. It was determined that while the increase in visitation and potentially more crowds and congestion may be construed as an adverse impact, on balance the provision of more and improved visitor uses and recreation opportunities would result in a substantial long-term beneficial impact to visitor experience.