

REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

Recommendations for Additions to or Deletions from
the Coastal Barrier Resources System



**VOLUME 6
NEW YORK**

U.S. Department of the Interior



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the Coastal Barrier Resources System

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Mapped, edited, and published by the Coastal Barriers Study Group

United States Department of the Interior
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TABLE OF CONTENTS

	<u>Page</u>
Introduction.....	1
Background.....	1
Coastal Resource Management.....	2
Existing CBRS Units.....	5
Table: CBRS Units Established by Congress, 1982.....	5
Recommended Additions and Modifications.....	6
Table: Summary of Recommendations.....	7
State Comment Letter.....	10
Other General Comment Letters Concerning New York.....	11
Index to Existing and Proposed CBRS Units.....	15
Table: Maps Depicting Existing and Proposed CBRS Units.....	16
Table: Maps Depicting Otherwise Protected, Military, and Coast Guard Lands on Undeveloped Coastal Barriers.....	17
Map Key.....	18
Individual Unit Comment Summaries, DOI Responses, and Maps.....	19

NEW YORK

INTRODUCTION

The Coastal Barrier Resources Act (CBRA) of 1982 (Public Law 97-348) established the Coastal Barrier Resources System (CBRS), a system of undeveloped coastal barriers along the Atlantic and Gulf of Mexico coasts. This atlas of coastal barriers in New York has been prepared in accordance with Section 10 of CBRA (16 U.S.C. 3509), which states:

Sec. 10. Reports to Congress.

(a) In General.--Before the close of the 3-year period beginning on the date of the enactment of this Act, the Secretary shall prepare and submit to the Committees a report regarding the System.

(b) Consultation in Preparing Report.--The Secretary shall prepare the report required under subsection (a) in consultation with the Governors of the States in which System units are located and with the coastal zone management agencies of the States in which System units are located and after providing opportunity for, and considering, public comment.

(c) Report Content.--The report required under subsection (a) shall contain--

(1) recommendations for the conservation of fish, wildlife, and other natural resources of the System based on an evaluation and comparison of all management alternatives, and combinations thereof, such as State and local actions (including management plans approved under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.)), Federal actions (including acquisition for administration as part of the National Wildlife Refuge System), and initiatives by private organizations and individuals;

(2) recommendations for additions to, or deletions from, the Coastal Barrier Resources System, and for modifications to the boundaries of System units;

(3) a summary of the comments received from the Governors of the States, State coastal zone management agencies, other government officials, and the public regarding the System; and

(4) an analysis of the effects, if any, that general revenue sharing grants made under section 102 of the State and Local Fiscal Assistance Amendments of 1972 (31 U.S.C. 1221) have had on undeveloped coastal barriers.

Under the direction of the Assistant Secretary for Fish and Wildlife and Parks, this report has been prepared by the Coastal Barriers Study Group, a task force of professionals representing the National Park Service, U.S. Fish and Wildlife Service, U.S. Geological Survey, and other Departmental offices.

This volume of the report contains delineations of the existing CBRS units in New York and delineations of additions to and modifications of the CBRS in this State which the Department of the Interior recommends to the Congress for its consideration.

BACKGROUND

New York, the largest State in the Northeast, is one of the most diverse in the country in terms of its geography, natural resources, population, and economy. It covers 49,576 square miles of land and is 310 miles long from north to south and 330 miles wide from east to west.

Until the 1960's, New York was considered first in nearly all indices: population, cultural, or economic. Even though its growth rate slowed during the decade from 1960 to 1970, its population of nearly 18,000,000 is greater than any other State's except California, Florida, and Texas. Slightly less than half of New York's residents live in the 320 square miles surrounding and including New York City. The New York City area is within a few miles of the Atlantic Ocean, Hudson River, and barrier beaches that fringe the south shore of Staten Island and Long Island. Thus, while most of the State is sparsely settled, the coastal areas are under substantial pressure from development interests and human use. Long Island has most of the sandy beaches that attract the large population of New York City and its suburbs.

Long Island and the many smaller islands associated with this part of the State owe their origins to the last glaciation. The northern side of Long Island represents the

most southerly extent of the last glacier. Its landscape is, therefore, relatively hilly and irregular. High bluffs have been produced along the north shore as waves from Long Island Sound erode this glacial deposit. The central and southern portions of Long Island contain outwash plains that developed as the glacier melted. The landscape here is relatively level and gradually slopes towards the south. The erosion of these outwash deposits produced the extensive chain of coastal barriers that define the south shore and extend westward over 80 miles from Southampton. Smaller barrier beaches have formed wherever waves have had access to erodible glacial deposits on the north shore and around the many islands east of Long Island such as Shelter Island, Plum Island, and Gardiners Island. The very eastern part of Long Island fronting on the Atlantic consists of eroding glacial uplands with small barriers across salt ponds and small bays.

A southern type of forest occurs on Long Island. The wide variety of vegetation ranges from a mixed beech, maple, tulip tree, elm, gum, and oak forest in areas with plenty of water to a drier oak-hickory forest on uplands and finally a pitch pine and oak woodland on the driest and most well-drained uplands.

On some portions of eastern Long Island, a scrub woodland of dwarf oaks and pines exists, along with some heathland. The coastal marshes are dominated by cordgrass and are best developed behind the coastal barriers along the south shore. The typical strand community occurs on the long lines of dunes along the barriers: beachgrass, bayberry, beach heather, beach plum, pitch pine, little blue stem, and reeds. Scattered maritime forests exist on the barriers. The best known example is the Sunken Forest on Fire Island, where American holly, sassafras, and black gum dominate the woodland.

The coastal resources of the State are extensive. Long Island alone has 1,475 miles of saltwater shoreline (46 percent of the State's total coastline). The marine resources around Long Island include clam flats, oyster beds, salt marshes, estuaries, fin-fishing waters (both commercial and sport), and bays that support a wealth of marine life and waterfowl. Clamming in Great South Bay is a major coastal industry. Mining and extraction of mineral resources have a long history in the State.

The State continues to be a leader in maritime commerce and the Port of New York is one of the major seaports in the world today. The commercial fishery of New York has fallen into a severe decline in recent years. Today only one commercial fishing boat uses New York City as its home port and the active fishing fleet on Long Island is small compared to the fleets of the past. The oyster industry was also very large in the past. In 1976, the value of New York's commercial fisheries was estimated to be \$87.8 million, while that of sport fisheries was \$222.5 million. In 1981, economic returns from sportfishing in freshwater were estimated at \$405 million.

Development along the coast has been intensive for many years. Most of the 120 miles

of Long Island's south shore and much of the north shore have been developed for seasonal and year-round residences. The concentrations of homes are greatest along the East Hampton and South Hampton shore down to Shinnecock Inlet. Between Moriches Inlet and Robert Moses State Park on the western end of Fire Island, the only "natural" barrier remaining is now part of Fire Island National Seashore. Even within the National Seashore, there are developed inholdings, such as Ocean Beach and Fire Island Pines. The remaining 38 miles of barrier are heavily developed, except for some State parks and a portion of the Gateway Recreation Area at the end of Rockaway Beach. Development on these western barriers has resulted in urban complexes to the water's edge. Severe damage would occur along the south shore of Long Island if a major hurricane, like the 1938 storm, were to hit.

COASTAL RESOURCE MANAGEMENT

New York Coastal Resource Management

As late as 1973, the dredging and filling of wetlands along the coast were largely unregulated. Wetlands were convenient and inexpensive sites for the disposal of dredge spoils and huge amounts of garbage from the big cities until the mid- to late 1970's, when the State legislature began enacting laws to protect the marine and coastal environment. These laws include the following:

Tidal Wetlands Act, Environmental Conservation Law (Article 25). This Act regulates any land use activities that would diminish the value of wetlands as fish and wildlife habitats. Regulated activities include any form of draining, dredging, excavation, dumping, filling, construction, pollutant discharge, or other activity that directly or indirectly impairs the tidal wetland's ability to provide habitat. The Department of Environmental Conservation has inventoried, classified, and mapped the State's tidal wetlands.

Waterfront Revitalization and Coastal Resources Act (Executive Law, Article 42). This Act calls for the restoration and revitalization of natural and developed coastal resources. The main purpose of the Act is to restore, revitalize, and redevelop deteriorated and underutilized waterfront areas for commercial, industrial, cultural, recreational, and other compatible uses.

New York State Park Preserve System, Parks and Recreation Law (Article 20). This Law gives the Office of Parks, Recreation and Historic Preservation the power (in conjunction with Section 309, authorizing acquisition of land for State recreational facilities) to purchase park preserve areas in or near metropolitan regions in order to "maintain the integrity of fauna" and to "provide for management of all unique, rare, or endangered species of fauna within park preserve areas."

State Nature and Historical Preserve Trust, Environmental Conservation Law (Article 45). This Trust provides for acquisition, when

authorized by an act of the legislature, of real property (including less than fee interests) and administration of lands, outside the forest preserve counties, "of special natural beauty, wilderness character or geological, ecological, or historical significance."

Coastal Erosion Hazard Areas Act, Environmental Conservation Law (Article 34). This Act provides for the identification of coastal erosion hazard areas, including near-shore natural protective features such as shoals, bars, and spits, which if altered might lower the reserves of sand or other natural materials available to replenish storm losses through natural processes. The law also requires that excavation or other alteration of land will be regulated to minimize adverse effects on those natural protective features, as well as to prevent erosion of other lands.

Flood Plain Management Act, Environmental Conservation Law (Article 36). This Act ensures that if a community fails to qualify for the Federal Flood Insurance Program, the State will develop flood hazard regulations for that community to make it eligible for participation in the program. The regulations are, at a minimum, those specified by the Federal Emergency Management Agency. State agencies are also constrained by this law through regulation of such activities as the financing or authorization for implementation of projects on State lands. The regulations are, at a minimum, those specified by the Federal Flood Insurance Program.

Water Resources Act, Environmental Conservation Law (Article 15). This Act requires that proposals that would involve excavating or depositing fill in any navigable waters and adjacent marshes and estuaries of the State, including those to construct pipelines, obtain permits from the Department of Environmental Conservation.

State Environmental Quality Review Act (SEQRA), Environmental Conservation Law (Article 8). This Act requires State agencies and local governments to prepare an environmental impact statement (EIS) for any action that might have a significant impact upon the environment. The environment is broadly defined to include existing patterns of development and land resources. Actions subject to an environmental impact statement must minimize, or avoid to the maximum extent practicable, the adverse environmental effects revealed in the impact statement (ECL 8-0109-8). In addition, pursuant to the Tidal Wetlands Act, SEQRA regulations are amended to require that actions by a State agency for which an EIS has been prepared shall also be consistent with that Act's coastal policies.

Coastal Zone Management Program. The New York Coastal Management Program began to be developed in 1975. The State's program is based on several determinations made in response to the Federal Coastal Zone Management Act of 1972.

1. New York State would, to the greatest extent possible, rely upon

existing laws and programs to implement the program's objectives.

2. New legislation (Waterfront Revitalization and Coastal Resources Act and the Coastal Erosion Hazards Area Act) would be passed to fill gaps in existing laws and programs, thus enabling the State to have an approvable program.

3. Comprehensive review processes, such as the Environmental Quality Review (Environmental Conservation Law, Article 8), Siting of Major Steam Electric Generating Facilities (Public Service Law, Article 8), and Siting of Major Utility Transmission Facilities (Public Service Law, Article 7) would be used to determine an action's consistency with the program's policies.

4. Local governments would be encouraged to develop and implement waterfront revitalization programs, thus participating in the State's Coastal Management Program.

Chapter 464 of the Laws of 1975 authorizes the New York Secretary of State to apply for, receive, and administer any Federal funds which are made available to the State under the Coastal Zone Management Act of 1972, as amended. These laws also permit the Secretary to enter into agreements with other State, regional, county, and local agencies that could assist the Department of State in the administration or implementation of the Coastal Management Program.

The Waterfront Revitalization and Coastal Resources Act, passed in 1981, requires the Secretary to file, maintain, and, when appropriate, amend the coastal area map that shows the lands and waters in New York State to which the Act's coastal policies apply. The Act also charges the Secretary to review and approve waterfront revitalization programs prepared by coastal communities. As part of this review process, State agencies and appropriate county and local governments must consult with the Secretary of State before any local waterfront revitalization program can be approved. In situations where a conflict between a local program and an existing State policy arises, the Secretary must attempt to resolve the differences.

The Department of State also performs other activities essential to the State's Coastal Management and Waterfront Revitalization Programs. The department tracks actions proposed in the coastal area through the State Environmental Quality Review Act (SEQRA) process and evaluates the consistency determinations made by State agencies. When appropriate, the department advises the agencies on the consistency of such actions with the coastal policies. The program-related administrative and implementation activities of agencies under contract to the department are also monitored and reviewed.

Changes to policies and boundaries of the coastal area require the review and approval of the Secretary of State. If appropriate, such changes may necessitate notification, review, and/or approval by the Federal and local governments. Procedures covering amendments to local Waterfront Revitalization

Programs are found in the draft regulations pertaining to the department's review and approval of such local programs.

The Department of State is also responsible for conducting the Federal consistency review process at the State level. Generally, the department will evaluate major actions proposed in the coastal area of the State by Federal agencies or by entities requiring Federal permits and determine the consistency of those actions with the program's policies. The Department of Environmental Conservation (DEC) has the major responsibility for protecting the natural resources of the coastal area. This responsibility includes new administrative authority for protecting coastal erosion hazard areas as well as its existing permit authority for wetlands, both tidal and freshwater, and air and water quality.

In its permitting role, DEC reviews most activities that have the potential to affect coastal resources. Those which may have significant impacts are thoroughly reviewed in connection with the SEQRA process and can be approved only after DEC has found that the activity will be consistent with the policies of the Coastal Management Program. This review ensures comprehensive implementation of the program with respect to a wide variety of activities.

In addition, DEC is responsible for a number of direct and funding activities; some of these, such as the construction of wastewater treatment facilities, have major consequences for coastal development. The assured consistency of these activities will have major long-range beneficial effects on the coastal area.

The main thrust of the State's coastal program is to coordinate the many laws and programs that have been passed in recent years. The program has spelled out 44 policies relating to management of the State's coastal resources. Each of these policies is directed toward a specific coastal problem; existing laws and agencies are used to carry out the policies. The policies require that agencies responsible for carrying out the existing laws consider interrelationships that exist or should exist in the coastal area--not just interrelationships evident in a single ecosystem, i.e., wetlands, but in the coastal area as a whole.

Section 919 of the Waterfront Revitalization and Coastal Resources Act deals specifically with coastal barriers. It requires that "State agencies actions, including funding, planning, land transactions, as well as direct development activities, must be consistent with the policies of this Act." This provision of law is implemented by amendments to SEQRA and by Department of State regulations. Those regulations (19 NYCRR Part 600) provide that, for direct actions which do not have a significant effect on the environment, State agencies must certify that the action is consistent with coastal policies. These policies state that activities or development in the coastal area will be undertaken so as to minimize damage to natural resources and property from flooding and erosion by protecting natural protective features including beaches, dunes, barrier islands, and bluffs;

that primary dunes will be protected from all encroachments that could impair their natural protective capacity; that the Secretary of State shall review actions of State agencies that may affect achievement of the policy; and, that SEQRA regulations be amended to reflect consideration of the adverse effect of activities or development on natural protective features.

The Tidal Wetlands Act is designed to preserve and protect tidal wetlands, and to prevent their devastation and destruction, giving due consideration to the reasonable economic and social development of the State. The regulatory program associated with the Act is contained in the NYCRR, Title 6, Parts 660 and 661. Part 660 describes a moratorium regulatory program, and Part 661 details a permanent regulatory program. The moratorium program provided interim protection to wetlands while the tidal wetlands inventory was being completed. Once maps were filed with the appropriate local governments, the moratorium on development in the majority of wetlands was lifted and permanent land use regulations went into effect.

For the purposes of the Tidal Wetlands Act, the permanent regulations apply to six tidal wetland types and divide land uses into four categories: uses not requiring a permit, generally compatible uses, presumptively incompatible uses, and incompatible uses. All but the first category are subject to permit restrictions. More specifically, regulated uses include draining, dredging, excavation, filling, construction of facilities, pollution, and land subdivision.

Each application for a permit is subject to a hearing; a notice of public meeting is sent to affected parties. If no objections are received, the hearing may be canceled. The application is reviewed and denied or granted with conditions to minimize impacts. Permits may be suspended or revoked upon grounds stated in the regulations.

Local Actions

In 1985, the Long Island Regional Planning Board was under contract with the Federal Emergency Management Agency (FEMA) to prepare a Hurricane Damage Mitigation Plan for the south shore of the Long Island counties of Nassau and Suffolk. This plan, which is now completed, contains recommendations for modifying FEMA regulations in flood-prone areas.

The Southampton Conservation Board has had beach and dune setback restrictions on barrier beaches for several years. New York State also has wetland setbacks for marshes behind barriers, and a floodplain overlay district covers the barrier beaches. The Town of Southampton is sensitive to the issue of coastal conservation and regulates development under Paragraph 69.9 of the Town Code. Suffolk County owns a large portion of the barrier system west of Shinnecock Inlet, and this area has been preserved. The eastern side is heavily developed and a commercial fishing facility is being constructed at the inlet. The Town has issued a moratorium on building permits in the heavily eroding area in front of Moriches Bay. Construction continues elsewhere.

The Town of Shelter Island amended its own zoning ordinance to include the CBRS units within its district. In taking this action the Board stated:

. . . whenever an undeveloped coastal barrier district (OBRA and CBRS Units) exists within a major district, no structure shall be erected nor operations conducted thereon, or use made thereof other than the use existing at the time of the adoption thereof, unless approved by the Board of Appeals.

Private Sector Initiatives

Chapters of the Nature Conservancy, particularly the Long Island Chapter, have been active in preserving coastal barriers throughout Long Island.

EXISTING CBRS UNITS

A brief description of each existing CBRS unit in New York follows. Each unit is identified by its ID code and name (established by Congress in 1982) and the county in which it is located.

F01-Fishers Island Barriers (Suffolk). This unit is on the southeast coast of Fishers Island facing Block Island Sound in the Town of Southold. It consists of a double spit system protecting Beach Pond to the east and Island Pond to the west.

F02-Eatons Neck (Suffolk). This recurved spit bends southward from Eatons Neck Point, just west of the Coast Guard station. The barrier protects a salt marsh and tidal flat and fronts on Long Island Sound.

F04-Crane Neck (Suffolk). This barrier spit, also called Flax Pond Beach, is attached to the eastern side of Crane Neck and protects Flax Pond and a substantial salt marsh system. The saltwater pond drains into Long Island Sound through a narrow channel at the eastern end of the barrier. The unit is

located just north of the Village of Old Field near Stony Brook.

F05-Old Field Beach (Suffolk). This double spit system has a dredged and jettied inlet leading to Port Jefferson Harbor. Its eastern spit is attached to Mt. Misery Point and its western spit is attached to Old Field Point. The barrier spits contain dune ridges over 10 feet high; marshes and tidal flats occur behind them. The unit is northwest of the Village of Port Jefferson in the Town of Brookhaven.

F06-Shelter Island Barriers (Suffolk). This unit contains two barriers--Upper Beach and Lower Beach--that are part of a tombolo system connecting the Ram Islands to the main part of Shelter Island. The larger Upper Beach runs from Shelter Island to Little Ram Island. Lower Beach connects Ram and Little Ram Islands.

F08A-Sammys Beach (Suffolk). This bay barrier at the mouth of Threemile Harbor fronts on Gardiners Bay in Long Island Sound. The barrier is bisected by a dredged and jettied inlet that opens into Threemile Harbor. The western section, which is attached to Lafarges Landing, is called Sammys Beach. The eastern section is Maidstone Park Beach. The barrier has dunes up to 10 feet high that recurve into the harbor, and a large salt marsh behind the dunes called The Flats. A small island in the inlet known as Dayton Island is also included in this unit.

F08B-Acabonack Harbor (Suffolk). This unit, containing two sections on part of a spit protecting Acabonack Harbor, trends southward from the Village of Gerald Park and faces Gardiners Bay. It also contains a smaller spit attached to Acabonack Cliff that recurves westward across the mouth of East Harbor, and several marsh islands and a small wooded island in the harbor.

F09-Gardiners Island Barriers (Suffolk). This unit contains five barriers on Gardiners Island. Bostwick Point, on the north end of the island, forms a cape with barrier spits

CBRS UNITS IN NEW YORK ESTABLISHED BY CONGRESS, 1982

Unit Name	Unit ID Code	County	Shoreline Length (miles)	Total Area (acres)	Fastland Area (acres)
Fishers Island Barriers	F01	Suffolk	0.9	41.3	16.6
Eatons Neck	F02	Suffolk	0.8	36.9	15.8
Crane Neck	F04	Suffolk	0.7	147.5	29.2
Old Field Beach	F05	Suffolk	2.2	409.8	148.6
Shelter Island Barriers	F06	Suffolk	2.3	217.8	83.0
Sammys Beach	F08A	Suffolk	0.8	353.3	98.3
Acabonack Harbor	F08B	Suffolk	2.1	172.2	53.6
Gardiners Island Barriers	F09	Suffolk	6.9	1,600.1	165.9
Napeague	F10	Suffolk	0.9	214.2	151.6
Mecox	F11	Suffolk	0.6	99.8	42.0
Southampton Beach	F12	Suffolk	1.4	548.7	189.8
Tiana Beach	F13	Suffolk	1.4	793.1	136.2
Totals:			21.0	4,634.7	1,130.6

protecting Bostwick Creek and its marshes. This is the largest barrier system on the island and consists of washover flats and low dunes. It is a major nesting area for shorebirds, terns, and gulls. Cherry Hill Beach is a small barrier in front of Cherry Hill Pond on the western tip of the island. Just to the east of Cherry Hill is Home Pond Beach protecting Home Pond; this, too, is a bay barrier. On the east side of the island is Tobaccot Pond Beach, which is a bay barrier of low dunes and washover flats. The fifth barrier is a long spit that extends southward from Great Pond on the southern tip of the island towards Cartwright Island, to which it was once connected. This spit is a low washover feature with only scattered dunes. The beaches of Gardiners Island are among the few in New York that remain in their natural state and are nesting grounds for many sea and shore birds, including the roseate tern, potentially an endangered species. The barriers and associated ponds are important habitats for many species of herons, waterfowl, gulls, ospreys, skimmers, and terns.

F10-Napeague (Suffolk). This unit has an outstanding dune system with elevations up to 20 or more feet, two dune ridges throughout, and three dune ridges in certain sections. Protecting Napeague Bay, the barrier is on the south side of eastern Long Island facing the Atlantic Ocean. It is adjacent to Hither Hills State Park. The dunes provide habitat for numerous small animals, such as mice and rabbits, and are excellent hunting grounds for raptors. Peregrine falcons and short-eared owls--both considered rare on Long Island--and marsh hawks have been seen in the unit.

F11-Mecox (Suffolk). This unit consists of a large bay barrier with a dune ridge up to 30 feet high. It protects two small ponds, Jule Pond and Channel Pond, which are near the southwestern corner of Mecox Bay on the south shore of Long Island in the Town of Southampton. The beach is called Watermill Beach and faces the Atlantic Ocean.

F12-Southampton Beach (Suffolk). This unit is at the western end of a linear spit called Southampton Beach. The barrier protects Shinnecock Bay and extends westward from Southampton on the south shore of Long Island. It has a single vegetated dune ridge with portions up to 20 feet high. A sand road runs down the back of the barrier to the inlet. Salt marshes fringe the backside of the barrier. Shinnecock Inlet is dredged and jettied.

F13-Tiana Beach (Suffolk). Tiana Beach is part of the bay barrier system protecting Shinnecock Bay and is located west of Shinnecock Inlet near the Village of Hampton Beach.

The barrier consists of a single dune ridge that reaches 20 or more feet in places and supports typical dune vegetation. A dune road runs along the backside of the

barrier. Salt marshes along the bay shore of the barrier, including one called Sedge Island, are included in the unit, as well as bay waters out to Quogue Canal. The barrier itself fronts on the Atlantic Ocean.

RECOMMENDED ADDITIONS AND MODIFICATIONS

The Department of the Interior recommends that all undeveloped, unprotected coastal barriers and associated aquatic habitat along the Atlantic coastline in New York be added to the Coastal Barrier Resources System. The DOI also recommends that otherwise protected, undeveloped coastal barriers be excluded from the CBRS. However, if any otherwise protected, undeveloped coastal barrier is ever made available for development that is inconsistent with the purposes of the CBRA, the DOI recommends that it then be automatically included in the CBRS. A complete discussion of DOI's recommendations concerning otherwise protected undeveloped coastal barriers appears in Volume 1. Maps of all otherwise protected, undeveloped coastal barriers in New York appear in the following section. A table presenting the Department's position on each existing or proposed unit identified in New York follows this discussion.

The Department of the Interior's recommendations were developed after full consideration of the many public, State and Federal agency, and Congressional comments on the delineations in the Draft Report released in March 1987. The State of New York reviewed the 1987 Draft Report and supports both a CBRS expansion in New York and the exclusion of otherwise protected coastal barriers from the System.

The State seemed to have some confusion about DOI's delineation of associated aquatic habitats. The DOI criteria include in the CBRS those aquatic habitats associated with undeveloped coastal barriers only. Aquatic habitats associated with developed barriers are not included. The State suggested delineating aquatic habitat on the basis of boat traffic, excluding those wetlands that are frequently traversed; however, DOI does not consider this suggestion practicable. The State offered no comments on individual existing or proposed units in New York. The State's position on the DOI's general recommendations are discussed in Volume 1.

The Department received 8 other comment letters concerning New York; all but one supported the CBRS expansion. Most also expressed opinions on individual existing or proposed CBRS units. These comments are discussed and reprinted in the following section, interspersed with the appropriate maps. Two letters suggested that Clam Island, in Noyack Bay, be added to the CBRS. Clam Island is an undeveloped, unprotected secondary barrier island and DOI does recommend it be added to the CBRS as unit NY-41.

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN NEW YORK

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shore-line Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
NY-03	Sands Point	Nassau	3	0.6	55	21	Add to CBRS
NY-06	Frost Creek	Nassau	3	0.6	97	15	Add to CBRS
NY-07	Oyster Bay	Nassau	3	0.4	253	38	Add to CBRS
NY-10	Lloyd Point	Suffolk	3	1.2	263	63	Add to CBRS
F02	Eatons Neck	Suffolk	3	0.9	92	19	Add new area to existing CBRS unit
F04	Crane Neck	Suffolk	1	0.7	147	29	No change to existing CBRS unit
F05	Old Field Beach	Suffolk	1	2.5	1,295	149	Add new area to existing CBRS unit
NY-24	Plum Island	Suffolk	1	1.3	217	87	Add to CBRS
F01	Fishers Island Barriers	Suffolk	1	1.2	135	24	Add new area to existing CBRS unit
NY-26	Pipes Cove	Suffolk	1	0.4	62	16	Add to CBRS
NY-27	Conkling Point	Suffolk	1	0.5	27	15	Add to CBRS
NY-28	Southold Bay	Suffolk	1	1.1	256	31	Add to CBRS
NY-30	Hog Neck Bay	Suffolk	1	1.0	262	29	Add to CBRS
NY-31	Broadwater Cove	Suffolk	1	0.6	116	18	Add to CBRS
NY-32	Downs Creek	Suffolk	1	0.3	66	11	Add to CBRS
NY-33	Robins Island	Suffolk	1	1.1	41	21	Add to CBRS
NY-36	Flanders Bay	Suffolk	1	0.7	608	48	Add to CBRS
NY-37	Red Creek Pond	Suffolk	1	0.4	71	15	Add to CBRS
NY-38	Squire Pond	Suffolk	1	0.4	53	9	Add to CBRS
NY-39	Cow Neck	Suffolk	1	1.8	778	44	Add to CBRS
NY-40	North Seal Harbor	Suffolk	1	0.8	253	27	Add to CBRS
NY-41	Clam Island	Suffolk	1	0.6	101	27	Add to CBRS
NY-42	Mill Creek	Suffolk	1	0.3	54	8	Add to CBRS

(continued)

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN NEW YORK (CONTINUED)

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shore-line Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
NY-43	Sag Harbor	Suffolk	1	0.3	17	5	Add to CBRS
NY-44	Gleason Point	Suffolk	1	0.6	38	5	Add to CBRS
NY-46	Crab Creek	Suffolk	1	0.7	44	15	Add to CBRS
NY-47	Hay Beach Point	Suffolk	1	0.3	13	5	Add to CBRS
F06	Shelter Island Barriers	Suffolk	1	3.9	1,410	108	Add new area to existing CBRS unit
NY-48	Mashomack Point	Suffolk	1	2.0	299	77	Add to CBRS
NY-49	Smith Cove	Suffolk	1	0.3	37	4	Add to CBRS
NY-50	Fresh Pond	Suffolk	1	0.4	55	7	Add to CBRS
F08A	Sammys Beach	Suffolk	1	0.8	1,188	98	Add wetlands to existing CBRS unit
NY-52	Hog Creek	Suffolk	1	0.3	30	8	Add to CBRS
F08B	Acabonack Harbor	Suffolk	1	2.1	663	54	Add wetlands to existing CBRS unit
F09	Gardiners Island Barriers	Suffolk	1	7.3	1,636	170	Add new area to existing CBRS unit
F10	Napeague	Suffolk	1	1.7	1,275	215	Add new area and wetlands to existing CBRS unit
NY-56	Amagansett	Suffolk	1	0.9	85	43	Add to CBRS; is not federally protected
NY-57	Georgia/Wainscott Ponds	Suffolk	1	0.7	297	43	Add to CBRS; is not locally protected
NY-58	Sagaponack Pond	Suffolk	1	0.5	123	35	Add to CBRS
F11	Mecox	Suffolk	1	0.8	1,152	55	Add new area to existing CBRS unit
F12	Southampton Beach	Suffolk	1	1.5	1,409	211	Add new area to existing CBRS unit

(continued)

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN NEW YORK (CONCLUDED)

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shore-line Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
F13	Tiana Beach	Suffolk	1	0.5	3,326	43	Delete developed area in existing CBRS unit; add wetlands to existing CBRS unit
Total - CBRS as Recommended				45.0	18,399	1,965	
Existing CBRS				21.0	4,635	1,131	
Net Change in CBRS				+24.0	+13,764	+ 834	

^aUNIT ID CODE - State initials (NY) plus a number identify a proposed new unit. An existing unit is identified by the legal code letter (F) and number established by Congress in 1982.

^bUNIT NAME - For proposed new units, this is a provisional name based on a prominent local feature. For existing CBRS units, this is the legal name.

^cCONGRESSIONAL DISTRICT - U.S. Congressional District in which unit is located.

^dSHORELINE LENGTH - For existing units with additions or deletions, this length is for the entire unit, as modified.

^eTOTAL AREA - For existing units with additions or deletions, this area is for the entire unit, as modified.

^fFASTLAND AREA - This acreage is a rough estimate of the portion of the total area that is above the mean high tide line (i.e., the non-wetland area). It is a very general representation of the potentially developable land.

^gRECOMMENDATION - A brief explanation of the Department's recommendations to Congress. For more detailed explanations, see the following section. Abbreviations: FWS = Fish and Wildlife Service, NPS = National Park Service, CBRS = Coastal Barrier Resources System.

STATE COMMENT LETTER

1642



STATE OF NEW YORK
DEPARTMENT OF STATE
ALBANY, N.Y. 12231-0001

GAIL S. SHAFER
SECRETARY OF STATE

August 21, 1987

Mr. P. Daniel Smith
Deputy Assistant Secretary
for Fish and Wildlife and Parks
U.S. Department of the Interior
Washington, D.C. 20240

Dear Mr. Smith:

This is in response to your request for comments on the Draft Report to Congress: Coastal Barrier Resources System.

New York State continues to support the intent of the Coastal Barrier Resources Act (CBRA). Flooding and erosion, and habitat protection, are among the most serious issues facing the State's coastal area and in general we appreciate the way in which the proposed changes in the program might reinforce our efforts. However, we have concerns about certain aspects of the Report.

In regard to the section on Proposed Recommendations for Additions to or Deletions from the Coastal Barrier Resources System (CBRS), we offer the following comments. First, we believe that barriers on the Great Lakes should be added to the CBRS. As you are aware, the State of New York has both tidal and lake environments in its coastal area. In our view, coastal barriers, whether they are located on the Great Lakes or marine shorelands, perform the same basic function and are subject to the same types of harmful development practices, destabilizing activities and forces of nature. Second, as to the extension of the definition of "associated aquatic habitats" to encompass entire embayments behind barriers with up to one mile of open water and/or up to five miles of marshes, we have two concerns. First, given such a delineation, development may be directed into habitats behind developed barriers, habitats which may be of great value to the State. In contrast, some of the landward aquatic habitats protected by CBRA may be of less importance than those not so protected. The problem of inducing development in undesignated areas is one of the unintended impacts of CBRA, and the potential impacts on the aquatic systems merits an in depth discussion of alternatives to alleviate this potentially significant problem. Second, we would prefer to see a new set of criteria apply to the use of these water resources in terms of constraints on federal expenditures. If it is correct

- 3 -

military and Coast Guard lands. As regards those coastal barrier properties determined to be excess or surplus to federal government needs, we believe your recommendation should read instead, "DOI, in consultation with GSA, determines [which] are appropriate for inclusion in the CBRS."

We agree that the second conservation recommendation for Regulatory Consistency is unnecessary.

We have no comment on your recommendations on the tax policy alternatives other than to suggest that this subject should be examined further in two years, when the ramifications of the 1986 Tax Reform Act have been realized.

As to other amendments to CBRA, first, we agree with your proposed recommendation that federal funding for a facility located outside a CBRS unit whose direct purpose is to provide a tangible product within the CBRS unit (water, electricity, etc.) be restricted by CBRA.

We disagree with your recommendation to delete section 6(a) (3) solely on the basis that the U.S. Department of Transportation is claiming all federal highways to be "essential links". The states and local governments should not be required to forfeit the possibility of a reasonable exemption because of an interagency dispute at the federal level which should be resolved by the Administration.

The Section 6(a)(2) change you recommend regarding dredged material disposal can be clarified, we believe, by deleting the comma after the phrase, "... related to such improvements..." This will ensure that the consistency provision will be understood to apply only to the disposal of dredged materials.

Your final conservation recommendation calling for a joint study does not go far enough in our opinion. While we agree that the question of whether to replace damaged or destroyed structures after a major storm and the potential impacts of sea level rise are important, we believe the time has come to reexamine in a coordinated fashion, the full range of insurance, regulatory, and structural approaches which FEMA, the Corps of Engineers, NOAA, DOI and other involved agencies, carry out regarding coastal barriers. Only in this way will we be able to develop a new and much needed strategy toward coastal development, one which is comprehensive rather than disparate and one which will enable us to break out of our current trap of construction, destruction and reconstruction. The experiences associated in barrier island development and management over the last half century have demonstrated that the effective management of barrier islands requires a balance of regulation, acquisition/relocation, and other actions which are applied to each unique barrier based on quantitative economic, environmental and social benefits and costs. We recommend that in the report you ask Congress to authorize such a study.

- 2 -

to argue that these resources were previously omitted because of the original CBRA designation, then surely it is logical to ask that a new set of criteria be applied to funding for the type of activities which would not unduly affect those water resources. We have in mind the exemptions of "developed" water areas analogous to developed fastland exemptions, based, for example on their usage by heavy commercial and recreational traffic.

We are very pleased to see that the "otherwise protected" designations are reinstated for publicly owned parks, wildlife management, and similar recreation or conservation areas. Their exclusion from the CBRS will ensure that federal, state and local governments can continue to provide access for tens of million of our citizens to the unique experience which our ocean and Great Lakes barrier beaches provide. We also concur with the exception that privately owned property within an otherwise protected area be included by reference in the CBRS. We also agree with the automatic inclusion clause pertaining to lands being disposed of by not-for-profit entities for development inconsistent with the long term conservation of the barriers. We urge however, that the necessary amendment to CBRA include a provision that if such a transaction were to involve the sale of such lands to a government agency for conservation or recreation purposes, the lands would remain outside the CBRS as "otherwise protected."

As to the proposed conservation recommendation, first as to those pertaining to the acquisition alternative, we concur with the continuation of the user fee concept as one source of funding.

However, we must point out the reference on page 5 to the estimates that "the costs to the federal government of extending its current development programs to the remaining undeveloped coastal barriers would be more than five times greater than the cost of public acquisition." This is surely the strongest argument for federal funding of purchase of the undeveloped barrier beaches and storm damaged developed barriers, to be placed in federal, state or local stewardship. In this way, the federal government would show a considerable net saving in its accounts by foregoing expenditure for development or redevelopment of these areas and, at the same time, augment our store of national treasures with these remarkable barrier units preserved for conservation or recreation uses. This would also address the increase in development pressures on undesignated barriers which appears to be an unintended impact of the CBRA. It would be highly constructive to consider establishing a Coastal Barrier Purchase Reserve Fund at the federal level to be credited annually with amounts equivalent to a significant percentage of the monies that otherwise would have been spent by federal agencies in CBRS units. Distribution from this special fund could be allocated to each state based on the ocean or lake front mileage of barriers in the CBRS. Cost sharing arrangements could necessarily be part of such a provision.

Further, in regard to your recommendation as to the acquisition of CBRS lands by a government agency or a not-for-profit owner for recreation purposes, they should automatically become exempt from CBRA restrictions not only when they are added to an existing unit but also when they constitute a stand-alone unit. We disagree with the recommendation to exclude from the CBRS all

- 4 -

Under separate cover, you will receive technical comments on individual units in the CBRS and on the background data on New York State.

Thank you for giving us this opportunity to comment.

Sincerely,

Gail S. Shafer

GSS:ak

OTHER GENERAL COMMENT LETTERS CONCERNING NEW YORK

1105



GROUP FOR THE SOUTH FORK, INC.

117 MAIN STREET PO BOX 569 BRIDGEHAMPTON, NY 11932 516-537-1400

CHAIRMAN
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VICE CHAIRMAN
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PRESIDENT
NANCY NAGLE KELLEY AICP

1972 - 1987
Fifteen Years of
Environmental Stewardship

June 22, 1987

Mr. Frank McGilvrey
Coastal Barrier Study Group
U.S. Department of Interior
National Park Service 498
P.O. Box 37127
Washington, D.C. 20013

Dear Mr. McGilvrey,

Group for the South Fork is pleased to present its recommendations on the latest proposal for expansion of the Coastal Barrier Resources System. Our office has commented officially in several other comment periods pertaining to this subject dating back to 1981.

For the purposes of background, the Group is a not-for-profit environmental organization, staffed by professionals with expertise in the fields of natural resource planning, environmental impact inventory and assessment. Our office is supported by its 2,500 household members from the Towns of East Hampton, Southampton and Shelter Island.

We support the proposed changes by D.O.I., unless otherwise indicated in the series of attachments.

Sincerely,

Kevin McDonald
Vice President

KMcD/sar

Attachments

cc: Honorable Daniel Patrick Moynihan
Honorable Alphonse D'Amato
Honorable George Hockbrucken
Gail Schaffer, Secretary of State, State of New York
Elise Jones, National Wildlife Federation
Martin Lang, Southampton Town Supervisor
Judith Hope, East Hampton Town Supervisor
Southampton Press
East Hampton Star

A not-for-profit environmental planning organization dedicated to natural resource protection



GROUP FOR THE SOUTH FORK

Greenport Quadrangle

Recommendation: Add Clam Island

Status: Privately owned, undeveloped.

Clam Island is located directly southeast of the Morton National Wildlife Refuge, in Noyac in the Town of Southampton, Suffolk County, New York (Sag Harbor, N.Y. 7.5' Quadrangle) (see attached map).

Fish and Wildlife Values

Clam Island, located adjacent and southeast of the Morton National Wildlife Refuge, is a typical barrier tombolo spit, with exposed beach on the north side toward Noyac Bay, and a salt marsh on the south side towards Noyac Creek. The island proper contains approximately 6 acres of predominately oak uplands. The area contains approximately 4 acres of marsh and approximately 6 acres of sandy beach.

This area is an excellent example of a dynamic barrier spit migrating slowly south towards the mainland across Noyac Creek. Some remnants of backdune marsh are now exposed on the northern bay side. The spit is often underwater during storms, and serves as a protective feature for the shorefront homes along Noyac Creek.

The immediate proximity of this presently undeveloped area to Morton Wildlife Refuge gives it added value as wildlife habitat. Terns and other shorebirds are often seen feeding in the shallow waters of Noyac Bay.

The NYS Endangered least tern and Federally Threatened piping plover have been known to breed along the spit more than twice within the past five years. Kemp's Ridley turtles have been observed feeding in the lagoon bounded by this unit. The NYS Threatened osprey and Special Concern Species diamond-back terrapin now nest along the spit and at the edge of the uplands. NYS Special Concern species, the short-eared owl has been known to overwinter in the uplands. Black duck are known to nest in the marsh. Any development along the spit or in the uplands would probably result in the emigration of these species.



GROUP FOR THE SOUTH FORK

Napeague Beach Quadrangle

Recommendation: Add Napeague Dunes

Status: Privately owned. Limited development under 1 unit per 5 acres.

Napeague Dunes: This proposed unit consists of 121 areas of dunes and bogs in VE and AE flood hazard zones. (FIRM Map Panels, revised 1987). The ocean frontage is ±2700 feet and the depth of the unit is ±2000 feet (excluding parklands).

This unit is one of the few remaining essentially undeveloped dunefields on Long Island. It is about 20± dune slack (cranberry bogs, etc.) and its vegetation is dominated by a mosaic of typical dune vegetation (beachgrass, beach plum) and dwarf pitch pine - shad - bear oak. The back shore serves as nesting habitat for Colonial water birds (piping plover, least tern, occasionally common tern) and the dune field is a habitat for a variety of interesting and uncommon coastal wildlife forms, including the eastern spadefoot toad, eastern hognose snake, spotted turtle, eastern black racer, eastern newt, northern harrier and short-eared owl. Although there are individual houses scattered about, the area is only lightly developed and as of 1987, meets the density criterion, especially so, inasmuch as the unit includes one half mile of undeveloped beach seaward of the barrier.



GROUP FOR THE SOUTH FORK

Queque Quadrangle

Recommendation: Modify area to be excluded.

Upon information and belief, D.O.I. has proposed to exclude this area due to the five acre density requirement. If so, the area to be excluded was drawn too liberally. If this calculation is based only on land south of Dune Road, then the maps should be amended as proposed on the attached Preliminary Coastal Erosion Hazard Maps. If not, there should be no exclusions at all. The total acreage of wetlands plus beach brings existing development below the five acre density requirement. By excluding the areas outlined in red, the average density for the remaining unit falls below five acres per unit. This was apparently the practice at F-10 Napeague, East Hampton Gardiners Island East Quadrangle.

Tiana Beach is a classic barrier island. Moreover, as a result of it being relatively undeveloped, it harbors a sundry of wildlife. The New York State Endangered least tern population at Tiana Beach has recently been among the five largest on Long Island. Tiana Beach represents a significant segment of the full migration corridor for raptors moving along the Atlantic Coast. The undeveloped dunelands provide critical foraging and nesting areas for thousands of raptors each year including the peregrine falcon (NYS and Federal Endangered species), Northern harrier (NYS Threatened) and osprey (NYS Threatened). The productive coastal wetland ecosystem north of Dune Road is also an extremely important habitat for a variety of fish and wildlife species including piping plover (Federally Threatened). Not surprisingly, Tiana Beach has been designated as a Significant Coastal Fish and Wildlife Habitat by the New York State Department of State Division of Coastal Zone Management.

Therefore, based on the above we respectfully request that this section be redrawn to be more inclusive of Tiana Beach and only exclude the high density units identified in red on the attached maps. All other areas should remain part of the CBRS. Doing so will discourage development in this highly flood prone area, (the entire section is within a velocity zone), reduce federal expenditures, and preserve significant fish and wildlife habitats.



GROUP FOR THE SOUTH FORK

East Hampton Quadrangle

Recommendation: Add Wainscott Beach and Georgica Beach

Status: Privately owned, undeveloped

Wainscott Beach (Wainscott, East Hampton, N.Y.)

Wainscott Beach from the west side of Town Line Road (end) ±2400 feet east to the east side of Wainscott Road, including the Pond and its wetlands running to Main Street, Wainscott on the north. (See NYSDEC Coastal Erosion Hazard Map, East Hampton, Photo No. 7-398-83).

Wainscott Pond unit includes 16.5 acres of barrier beach fronting a coastal lagoon and ±45 acres of coastal lagoon, wetlands and drainage swales. The barrier beach is used sporadically by breeding piping plover (Federally Threatened), least tern (State Endangered) and common terns (State Threatened). The lagoon complex of wetlands and pond waters is a valuable wildlife area particularly for puddle duck species and geese, in the fall, winter and spring. It is mentioned in a New York State DEC report on East Hampton Town wetlands as a habitat for the State Threatened mud turtle. All of the lands and waters in this unit are within VE or AE Flood Hazard Zones (RE: FIRM Map Panels, revised 1987).

Georgica Beach (Wainscott, East Hampton and East Hampton Village, N.Y.)

Status: Privately owned, undeveloped.

The bay mouth barrier spit system running from a private road (Georgica Association, Inc.) on the west, ± 2200 feet east to the first house in the east dunes (East Hampton Village) and including part of Georgica Pond is shown on the attached figure (NYSDEC Coastal Area Hazard Area Map, Village of East Hampton, Photo No. 7-402-83).

In addition to meeting the density criterion, the coastal barrier serves as a habitat for breeding Colonial water birds



GROUP FOR THE SOUTH FORK

(least tern, piping plover), is a migratory resting and feeding area for waterfowl and waterbirds, and forms part of a complex coastal lagoon system rich in fishery objects (white perch, alewife, white bait, etc) and brackish water wetlands. The unit comprises ±15.2 acres of barrier spit and dunes and ±15.5 acres of coastal lagoon and flats.

All of the lands and waters in this unit are in VE or AE Flood Hazard areas (according to the FIRM Maps, revised 1987).

512

COMMITTEE TO PRESERVE CLAM ISLAND

Noyac Harbour Road
R.R. 1 Box 719
Sag Harbor, New York 11963

March 16, 1987

Donald Hodel
Secretary
U.S. Interior Department
Washington, D.C.

Dear Mr. Hodel:

We seek your help in preserving Clam Island.
Clam Island is a delicate 19-acre piece of land directly to the east of the Morton National Wildlife Refuge in Noyac. Indeed, because it is but 25 feet across an inlet from the wildlife refuge, it is often thought to be part of it. It has an identical highly-sensitive habitat in which animals and birdlife, some threatened, have made home.
Clam Island is threatened and, because of its proximity to the national refuge, the planned development on it stands to impact on the refuge.
We would like to see a combination of state, town and county -- and possibly federal -- funds be put together to save the island.
We are encouraged by the recent placement by Suffolk County of Clam Island on the list of properties that the county is recommending receive monies from the new New York State Environmental Act for preservation.
Recognizing, however, that there is great competition from all over the state to receive some of the limited funds from the act, we feel a multi-government approach would better insure that this highly-unique area is preserved.
We are hoping for a multi-government package along the lines of one put together last year to acquire for preservation the northern portion of Hither Woods in ~~Hampton~~ ^{MAY 27} Hampton, also threatened with development.

The town funds might come from the Open Space Bond Issue approved last year in Southampton Town. County monies might come from Suffolk's new Open Space Program.

Also, besides the possibility of New York State monies coming from the Environmental Bond Act, because Clam Island contains important wetlands, state funds might also be obtained from earlier state wetland issues.

Federal monies might come from Interior Department funds.

Northeastern Industrial Park Inc. had planned to build three houses and a quarter-of-a-mile long raised timber bridge along the isthmus which connects Clam Island to the mainland and on Clam Island. After a fight waged by this committee before the New York State Department of Environmental Conservation, that plan was altered by a DEC administrative judge. He limited construction to one house, a 340-foot long raised timber bridge and a 1,000-foot long filled causeway.

As was made clear at the hearing, any construction on Clam Island would have a serious effect. As Steven J. Sanford, senior wildlife biologist for the DEC testified, if "a house is built on this property, the impact will be an irreversible one."

He and others testifying at the hearing, including East Hampton Director of Natural Resources Laurence Penny, spoke of the wildlife on the island which would be endangered by development.

Making their home on Clam Island, they noted, have been such birds as the long-threatened osprey, the endangered Least Tern and Piping Plover, as well as four species of herons, the Horned Lark, the Northern Oriole, Flicker, Yellow Warbler, Prairie Warbler and a variety of ducks. The island has also been a habitat for red fox, white-tailed deer and turtles, including the threatened diamond-back terrapin.

As we stressed in the brief we submitted at the DEC hearing: Clam Island should be preserved, particularly in

light of its significant value as wildlife habitat and the fact that it is part of the Morton National Wildlife Refuge ecosystem.

Further, the hearing concerned how construction -- especially construction of a roadway -- would have a major impact on shoreline stability. The isthmus which connects Clam Island to the mainland is a sensitive barrier beach which protects Noyac Creek from storm surges and wave attack. Interfering with nature's processes on this isthmus would have long-term effects, it was established at the hearing.

As Dr. Gary Zarillo, oceanography professor at the State University at Stony Brook, testified: "If you build a roadway on this particular spit, you are going to be in deep trouble."

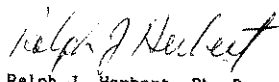
The principal of Northeastern Industrial Park Inc., Francesco Galesi, in the wake of the DEC's amendment of his company's plan, now reportedly has Clam Island up for sale. Thus, we feel there is no better time to take action to save Clam Island before it is too late.

We would deeply appreciate your assistance.

Sincerely,


W.L. Button, Jr.

For the Committee


Ralph J. Herbert, Ph. D.

DR. AND MRS. R. J. RIECHERS
BEAVER DRIVE
LOCUST VALLEY, N. Y. 11860

38

April 6 1987

Conservation Department
Department of the Interior
Washington D.C.

Gentlemen:

This letter is in support of your proposed plan to restrain development of wetlands areas in Gulltown, Massachusetts, Old Brookville and Ogden Bay Cove, Long Island, New York.

Sincerely,
Dr. and Mrs. Riechers

June 20, 1987

1175

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service - 498
PO Box 37127
Washington, DC 20013-7127

Dear Sirs:

I would like to submit the following comments on the Report to Congress on the Coastal Barriers Resource System (CBRS).

I SUPPORT the recommendations to:

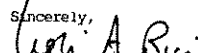
- Expand the geographical scope. The addition of units in the Florida Keys, Puerto Rico, and the Virgin Islands is justified by the functions served by these coral reefs and mangrove systems. Like the more traditional sand-based barrier, these areas are vital storm buffers and fish and wildlife habitats and ought to be included. By the same reasoning, areas in the Great Lakes and Pacific regions should be a part of the System. I urge DOI to reconsider the decision not to include the Great Lakes and west coast.
- Include associated aquatic habitats. The wetlands, marshes, waters etc. around a barrier beach comprise a complete and total ecosystem. The designation of these portions is essential to achieve the conservation goals of the Act. I commend the Department for expanding existing CBRS units to include associated aquatic habitat.
- Add secondary barriers. Living near one of the secondary barriers proposed for inclusion in CBRS, I heartily endorse this position. These bay barriers are very much classic barrier systems and serve the same protective functions as ocean barriers. In particular, I support the designation of the new unit, NY-50, Fresh Pond. On numerous occasions, during even mild storms, I have observed how damage is mitigated by this small, secondary barrier. It is a crucial storm buffer for this area. In addition, Fresh Pond is one of the few remaining wildlife and fishery havens left on this part of Long Island where development continues at a rampant pace and where the fishing economy is fragile. This area ought to be protected in any way possible and its designation is important for this reason as well. I would mention that there is a second barrier adjacent to NY-50 and I believe that spot may be eligible for inclusion too. I have marked the area on the attached map and ask that DOI inquire further into this matter. Further, I support the two other areas: North Haven designated for inclusion, NY-43 (Short Beach) and NY-44 (Gleasons Point).
- Clarify guidelines for Federal funding for projects that impact on CBRS units. Clearly, any activity undertaken outside the boundaries of a designated unit but designed to facilitate access or impact on that unit in some other way totally undermines all that the Act sets out to achieve. I endorse the recommendation to

develop policies to address this problem.

I OPPOSE the recommendations to:

- Delete military and Coast Guard lands. The national security argument is always a difficult one to fight against. However, I understand this recommendation stems from the Department of Defense's desire to maintain an officers club on the Onslow Beach unit in North Carolina. This is hardly a matter of essential national security or earth-shattering import to our national defense system. As a matter of principle, this hypocritical rationale ought to be exposed for what it is. The issue of national security ought not to be raised over such a sham. I urge DOI not to cave in on this point. It is important to the integrity of the entire system that all Federal agencies comply with the Act and that all military and Coast Guard lands remain as designated units.
- Delete the Department of Transportation from compliance with CBRA. The "essential link" argument seems to me to be an open ticket for the Department of Transportation to do whatever they wish. This is wrong. It is common sense that roadways are the first step to the development of an area and to allow for "replacement and reconstruction" seems a grave error. I believe this recommendation should be reconsidered.

I appreciate having this opportunity to comment and ask that my letter be included in the public record accompanying the Report. Thank you.

Sincerely,

Lesli A. Rice

155 East 77th Street
New York, NY 10021
and
Fresh Pond Road
North Haven, NY 11963

672

May 20, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service - 498
P.O. Box 37127
Washington, D.C. 20013-7127

RE: Coastal Barrier Resources
Act


Dear Coastal Barriers Study Group;

In response to the Department of the Interior's final draft report issued on March 23, 1987, I would respectfully request that recommendations which would strengthen the System be included in the final recommendations to Congress.

In particular, I would recommend, as has the OOI, the inclusion of secondary coastal barriers in large embayments, specifically those in and adjacent to Long Island Sound in New York and Delaware, Narragansett and Chesapeake Bays. Many of these secondary coastal barriers are listed as "otherwise protected" areas (owned by local governments or quasi public non-profit entities as parks or open space areas), however, they are not fully protected from future development without inclusion in the System. Many of these areas are subject to the same development pressures they would be subject to if in private ownership, and are subject to the changes in policies that come with changes in local government from year to year. Inclusion in the Coastal Barriers System will guarantee protection of these areas and their associated adjacent areas, and would strengthen local policies with regards to protection by local government.

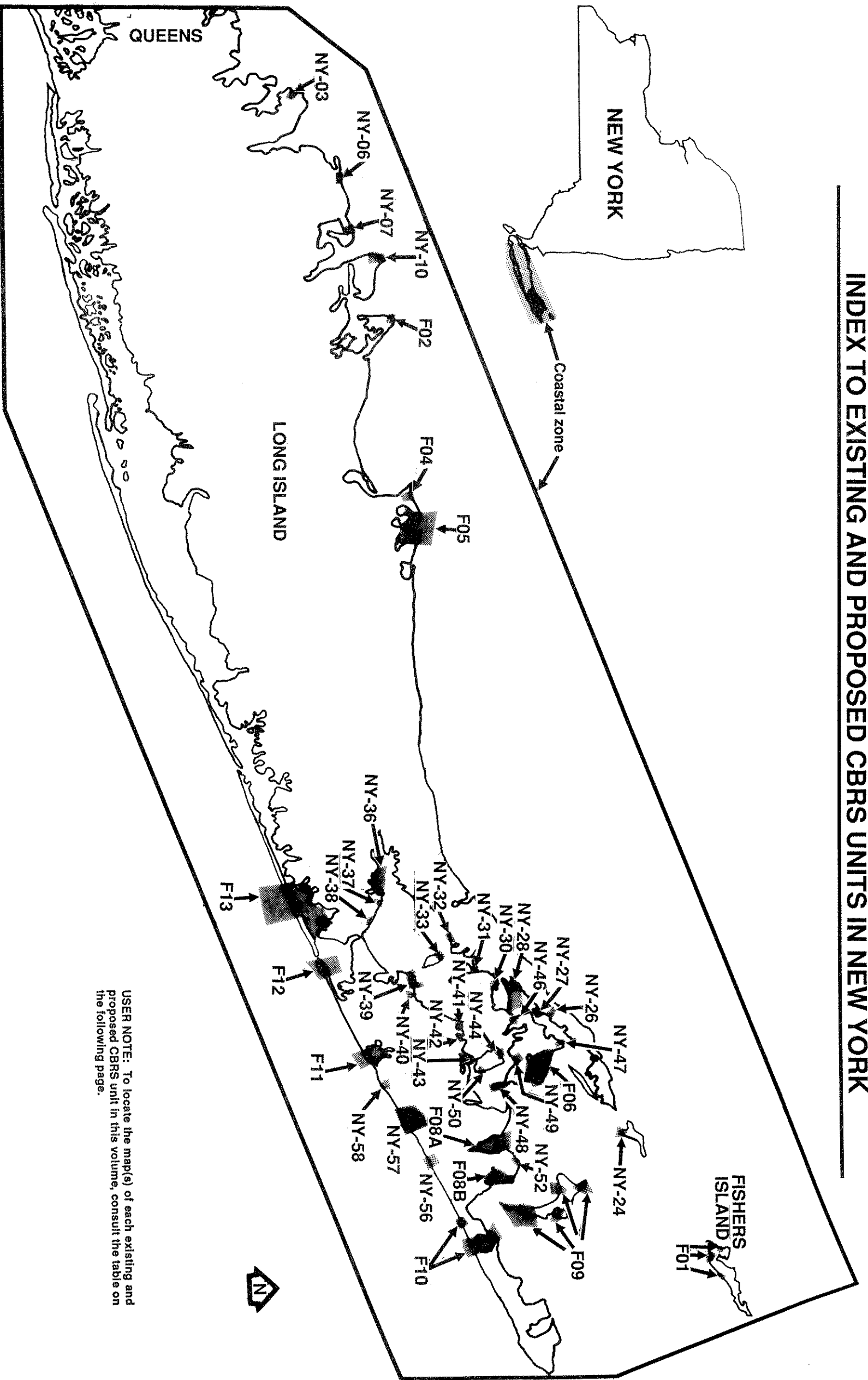
Although I have a somewhat "parochial" interest in the Long Island Sound region, I wish to express support for the expansion of the System to include additions to existing units and new areas including the Florida Keys, Puerto Rico, the U.S. Virgin Islands, Maryland and New Jersey; inclusion of secondary barriers in large embayments; private (and public) inholdings in "otherwise protected" areas; and all associated habitats.

I would also support the clarification and strengthening of Federal funding guidelines and restrictions (deletion of the "essential links" clause of the Act), and inclusion of the Great Lakes and Pacific Coast in the System. I am opposed to any deletions from the System.


Steven C. Resler
RFD #1, 114A Long Beech Rd.
St. James, New York 11780

cc: Congressman Mrazek
Congressman Carney

INDEX TO EXISTING AND PROPOSED CBRS UNITS IN NEW YORK



USER NOTE: To locate the map(s) of each existing and proposed CBRS unit in this volume, consult the table on the following page.

MAPS DEPICTING EXISTING AND PROPOSED CBRS UNITS

Unit ID Code	Unit Name	USGS Topographic Map or Map Composite	Page
F01	Fishers Island Barriers	New London	37
F02	Eatons Neck	Mystic	38
F04	Crane Neck	Lloyd Harbor	21
F05	Old Field Beach	Saint James	23
F06	Shelter Island Barriers	Port Jefferson	24
F08A	Sammys Beach	Greenport	31
F08B	Acabonack Harbor	Gardiners Island West	39
F09	Gardiners Island Barriers	Gardiners Island West	39
F10*	Napeague	Gardiners Island East	40
F11	Mecox	Gardiners Island East	40
F12	Southampton Beach	Sag Harbor	45
F13*	Tiana Beach	Shinnecock Inlet	46
		Quogue	47
NY-03	Sands Point	Sea Cliff	19
NY-06	Frost Creek	Bayville	20
NY-07	Oyster Bay	Bayville	20
NY-10	Lloyd Point	Lloyd Harbor	21
NY-24*	Plum Island	Plum Island	35
NY-26*	Pipes Cove	Southold	27
NY-27	Conkling Point	Southold	27
NY-28	Southold Bay	Southold	27
NY-30	Hog Neck Bay	Southold	27
NY-31	Broadwater Cove	Southold	27
NY-32	Downs Creek	Southampton	29
NY-33	Robins Island	Southampton	29
NY-36	Flanders Bay	Mattituck	30
NY-37	Red Creek Pond	Mattituck	30
NY-38	Squire Pond	Mattituck	30
NY-39	Cow Neck	Southampton	29
NY-40	North Seal Harbor	Southampton	29
NY-41	Clam Island	Greenport	31
NY-42	Mill Creek	Greenport	31
NY-43*	Sag Harbor	Greenport	31
NY-44*	Gleason Point	Greenport	31
NY-46	Crab Creek	Greenport	31
NY-47	Hay Beach Point	Greenport	31
NY-48	Mashomack Point	Greenport	31
NY-49	Smith Cove	Greenport	31
NY-50*	Fresh Pond	Greenport	31
NY-52	Hog Creek	Gardiners Island West	39
NY-56*	Amagansett	East Hampton	43
NY-57*	Georgia/Wainscott Ponds	East Hampton	43
NY-58	Sagaponack Pond	Sag Harbor	45

*Public comment summaries and DOI responses follow unit maps.

MAPS DEPICTING OTHERWISE PROTECTED, MILITARY, AND
COAST GUARD LANDS ON UNDEVELOPED COASTAL BARRIERS*

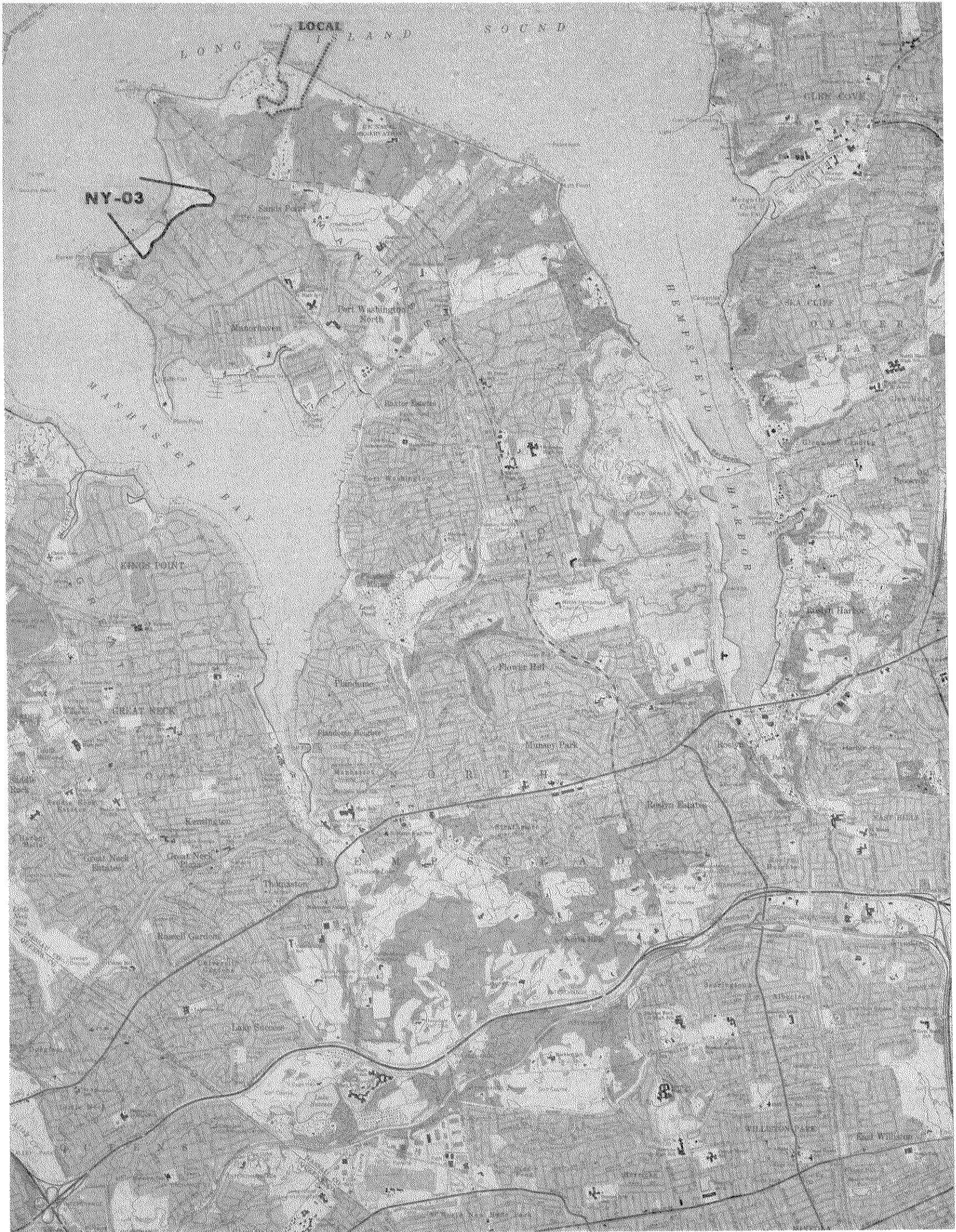
USGS Topographic Map or Map Composite	Coastal Barrier Status	Page
Sea Cliff	Local	19
Bayville	Federal, Local	20
Lloyd Harbor	Federal, State, Local	21
Northport	State, Local	22
Saint James	State, Local	23
Port Jefferson	Local	24
Wading River	State, Local	25
Mattituck Hills	Local	26
Southold	Local	27
Southampton	Federal	29
Mattituck	Local	30
Greenport	Federal, Local	31
Orient	State, Local	34
Plum Island	State	35
Gardiners Island West	Local	39
Gardiners Island East	State	40
Montauk Point	State, Local	42
East Hampton	Federal	43
Shinnecock Inlet	Local	46
Quogue	State	47
Eastport	Local, Coast Guard	49
Moriches	Federal, Local, Coast Guard	50
Howells Point	Federal, Local	51
Sayville	Federal	52
Bayshore East	Federal, State, Coast Guard	53
Bayshore West	State	54
West Gilgo Beach	State	55
Jones Inlet	State, Local	56
Far Rockaway	Federal	57
Coney Island	Federal	58
Arthur Kill	Federal	59

*These maps are provided for information purposes only. DOI is not recommending the addition of these areas to the CBRS unless they are made available for development that is inconsistent with the CBRA purposes.

MAP KEY

-----	Existing CBRS units
_____	Recommended additions to or deletions from the CBRS
.....	Military, Coast Guard, or otherwise protected, undeveloped coastal barrier
ADD	Area recommended for addition to the CBRS
DELETE	Area recommended for deletion from the CBRS
EXCLUDED	Area excluded from an existing or proposed CBRS unit because it is developed
FEDERAL	Federally protected, undeveloped coastal barrier; for information only
STATE	State protected, undeveloped coastal barrier; for information only
LOCAL	Locally protected, undeveloped coastal barrier; for information only
PRIVATE	Privately protected, undeveloped coastal barrier; for information only
MILITARY	Undeveloped coastal barrier owned by the military; for information only
COAST GUARD	Undeveloped coastal barrier owned by the Coast Guard; for information only

Maps are arranged in geographic order from west to east on the sound side of Long Island and the east to west on the ocean side of the island.



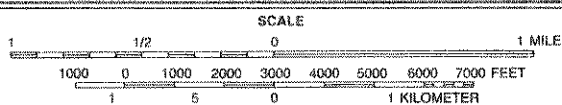
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DEPARTMENT OF THE INTERIOR



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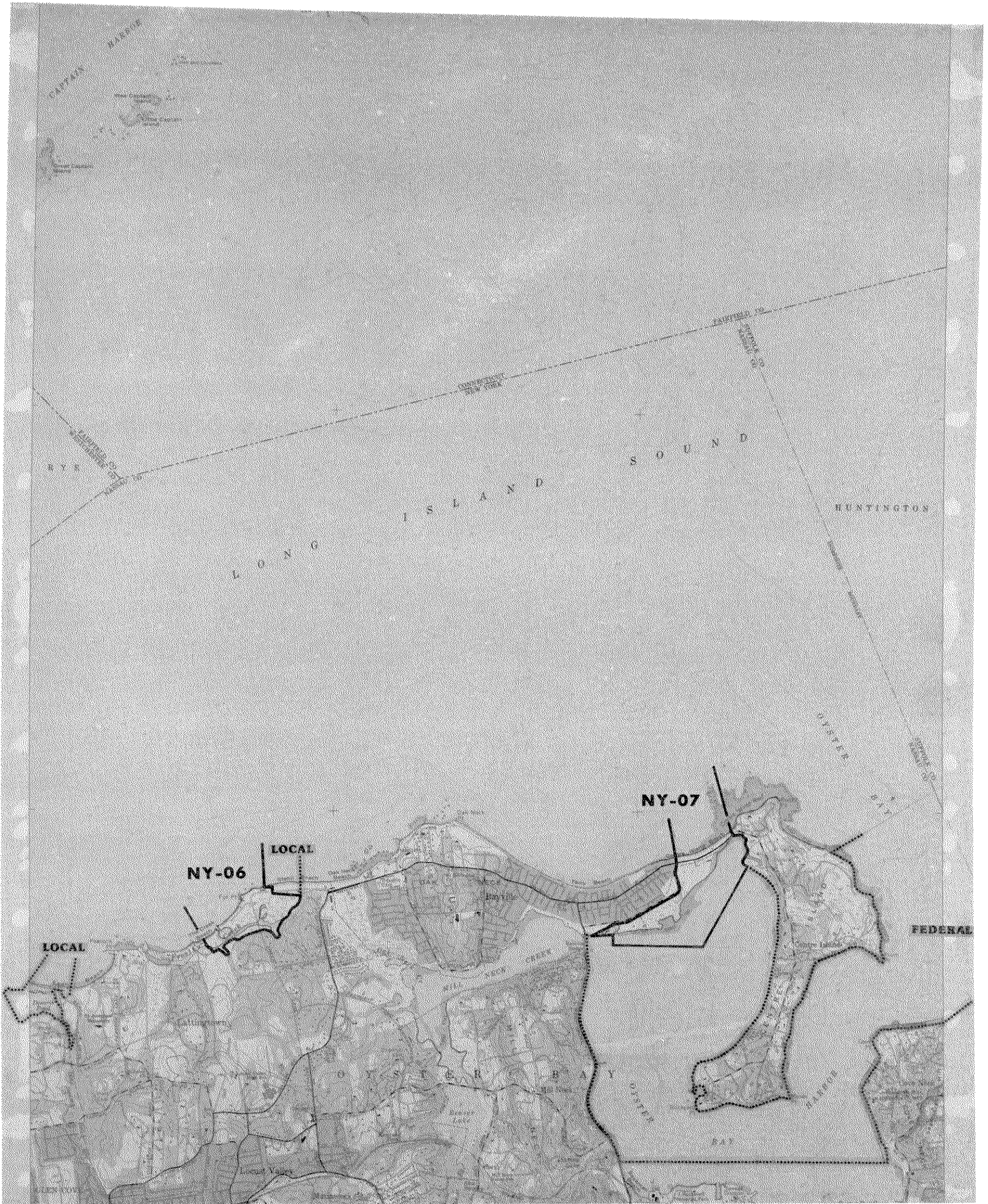
QUADRANGLE
SEA CLIFF
NEW YORK



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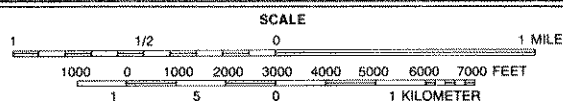
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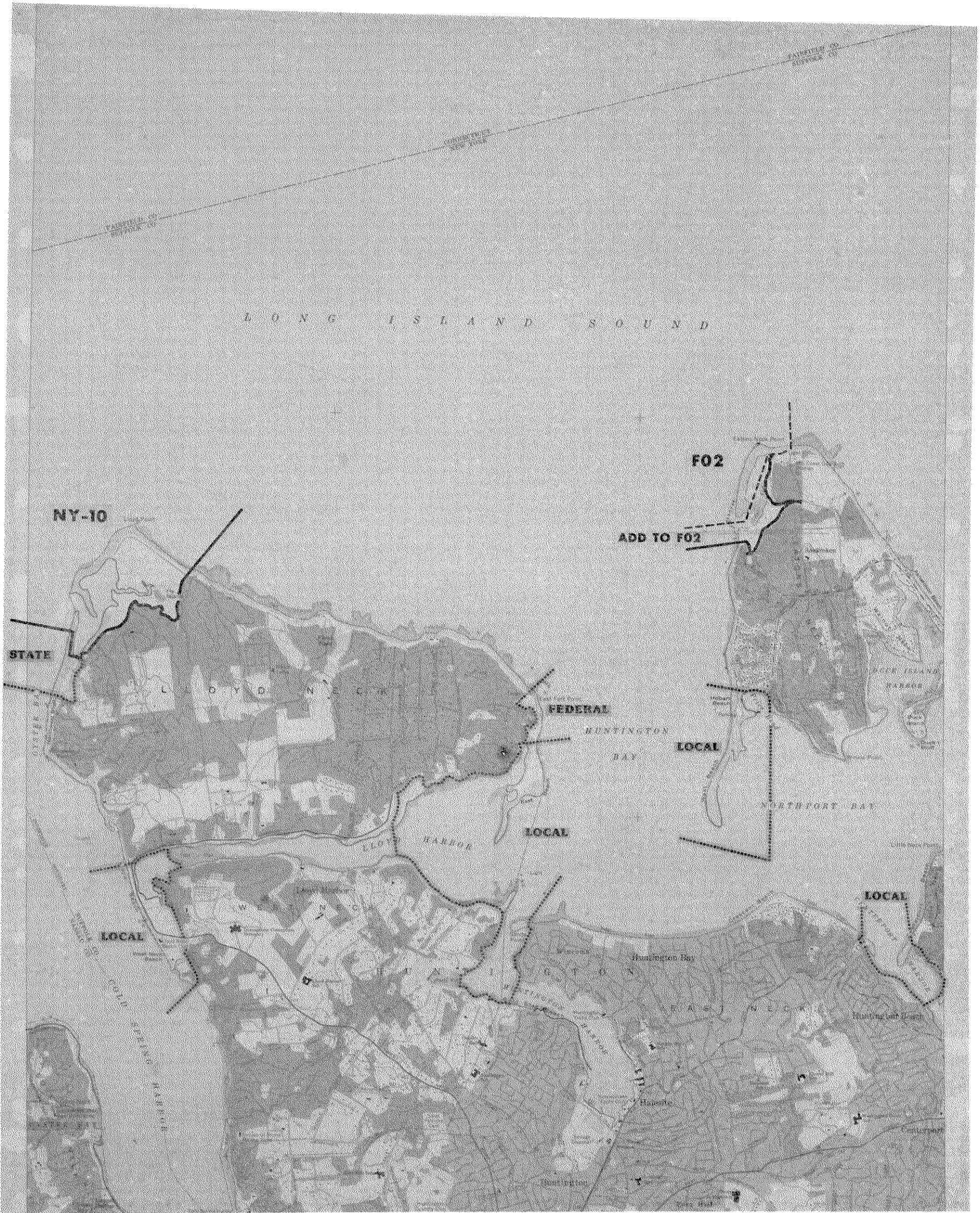
QUADRANGLE
BAYVILLE
NEW YORK



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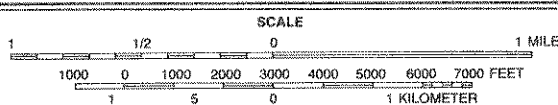
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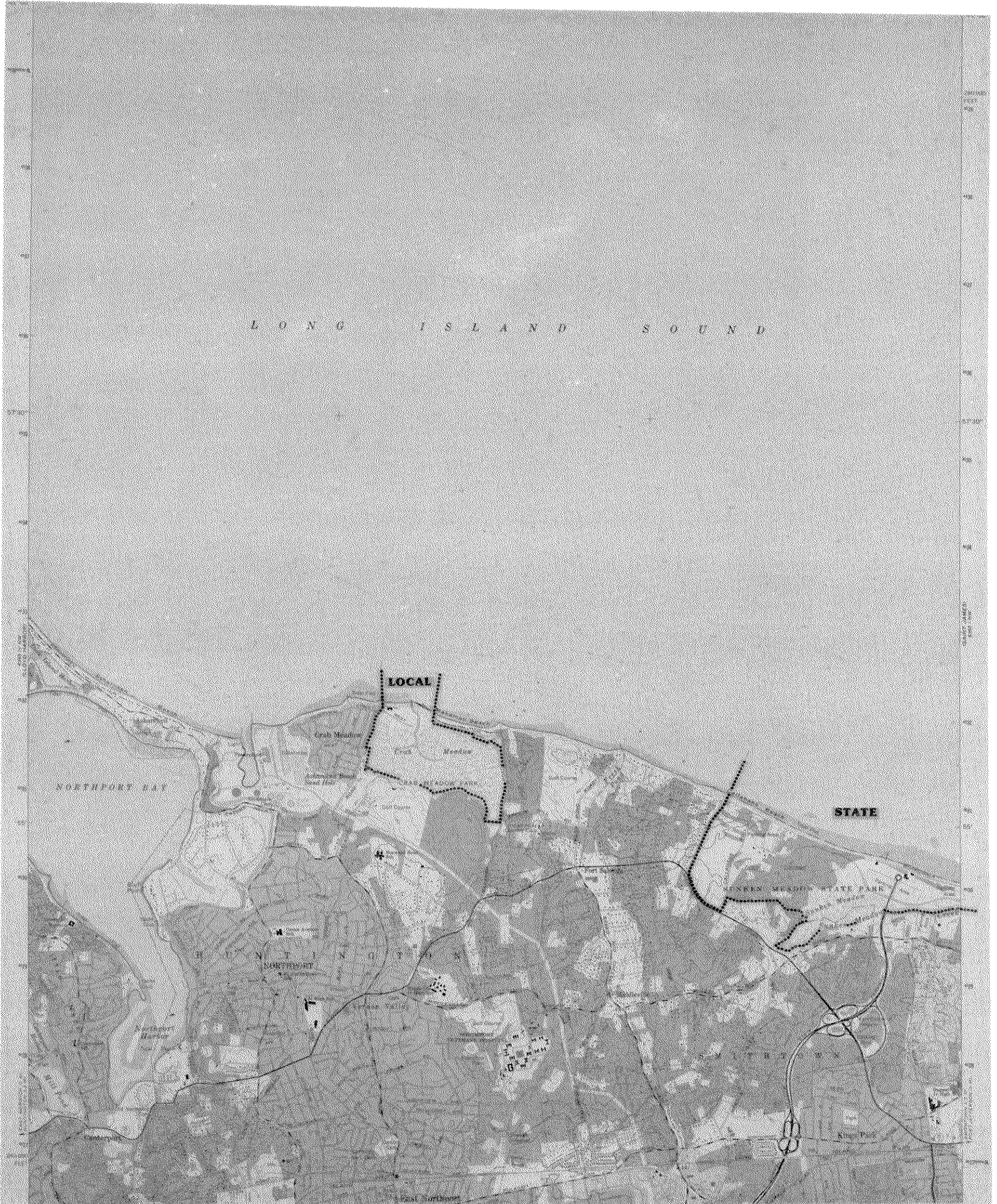
QUADRANGLE
LLOYD HARBOR
NEW YORK



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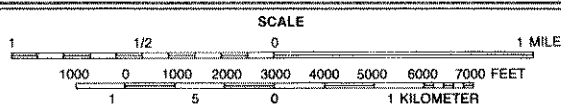
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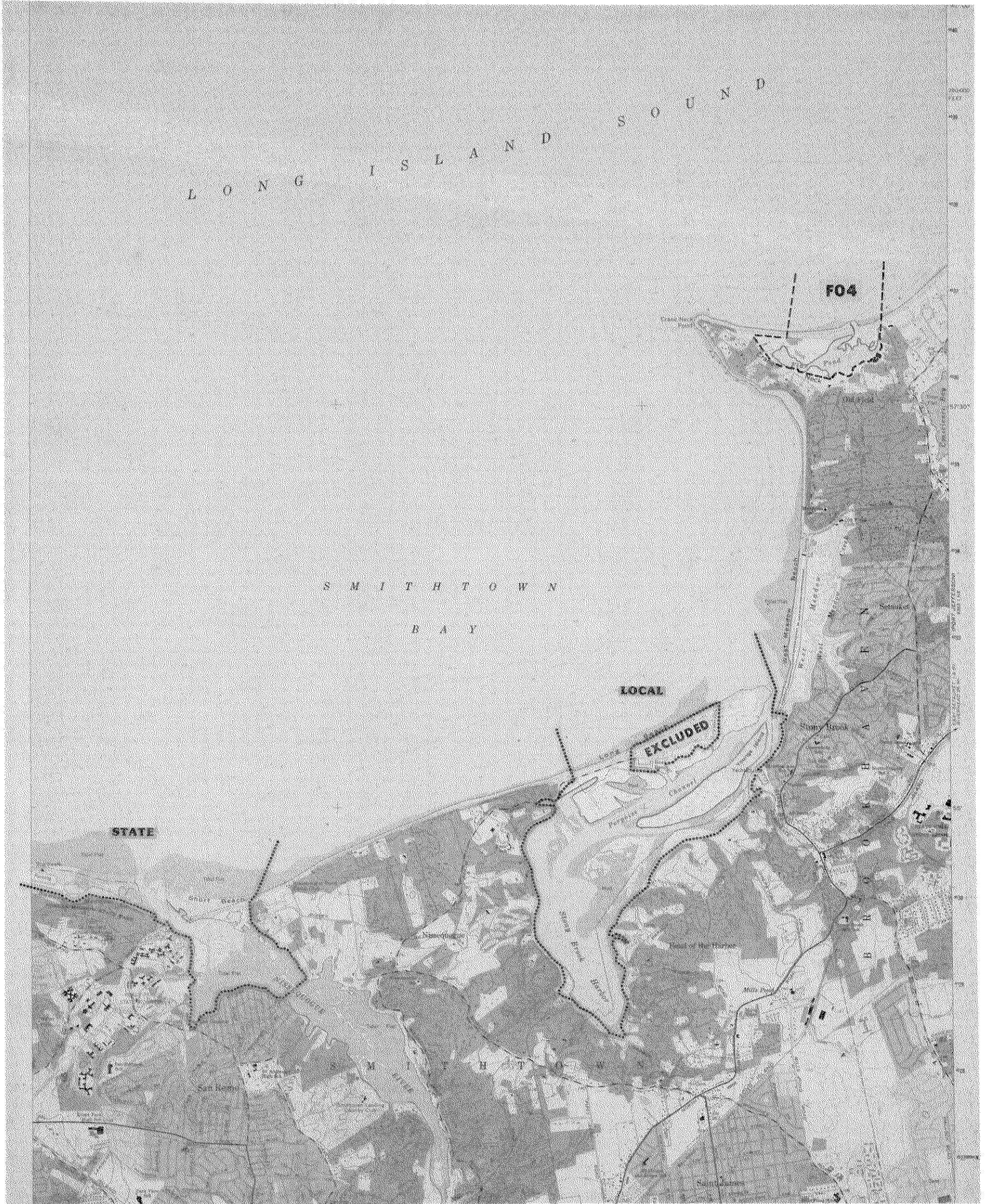
QUADRANGLE
NORTHPORT
NEW YORK



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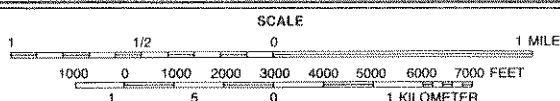
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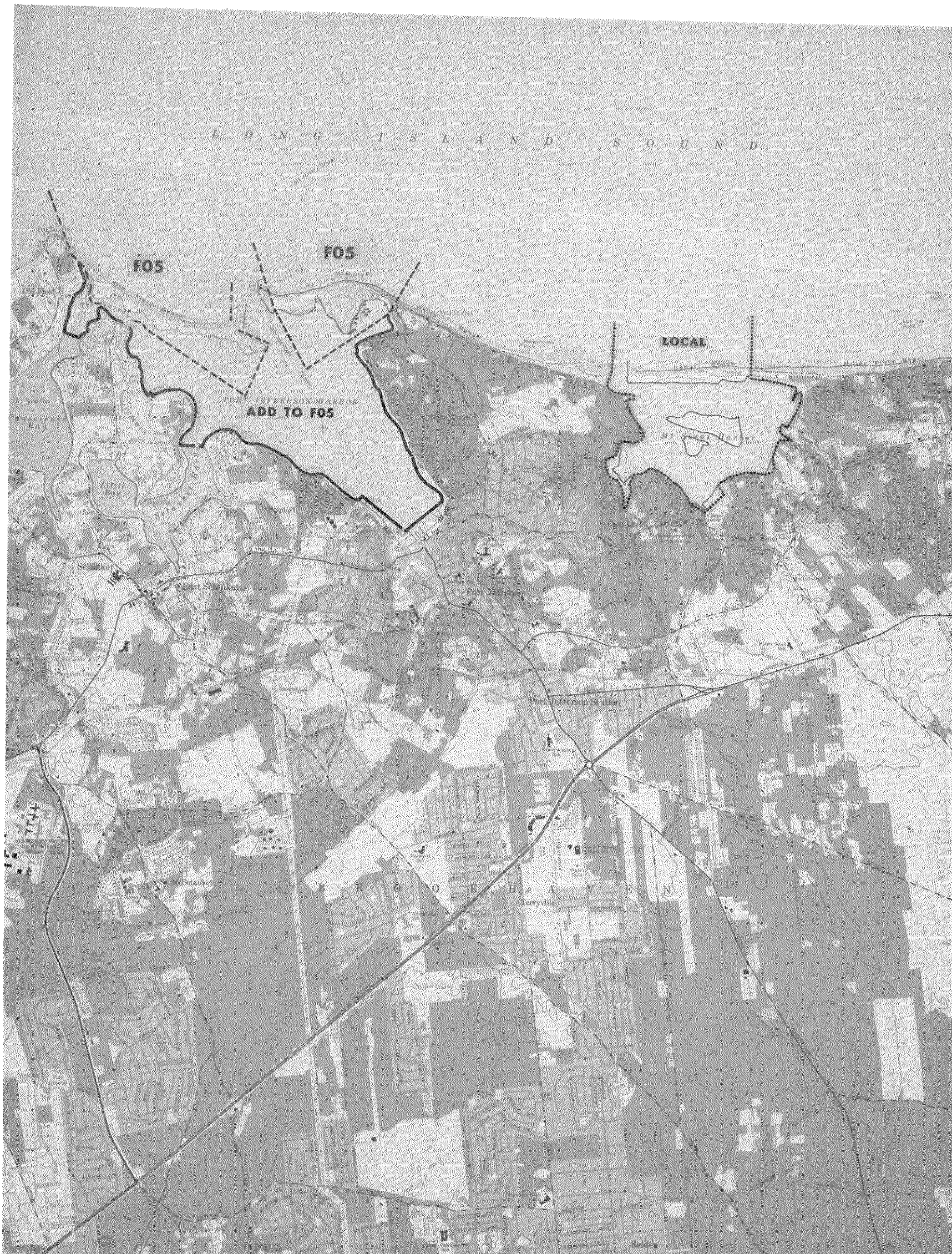
QUADRANGLE
SAINT JAMES
NEW YORK



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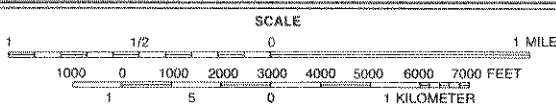
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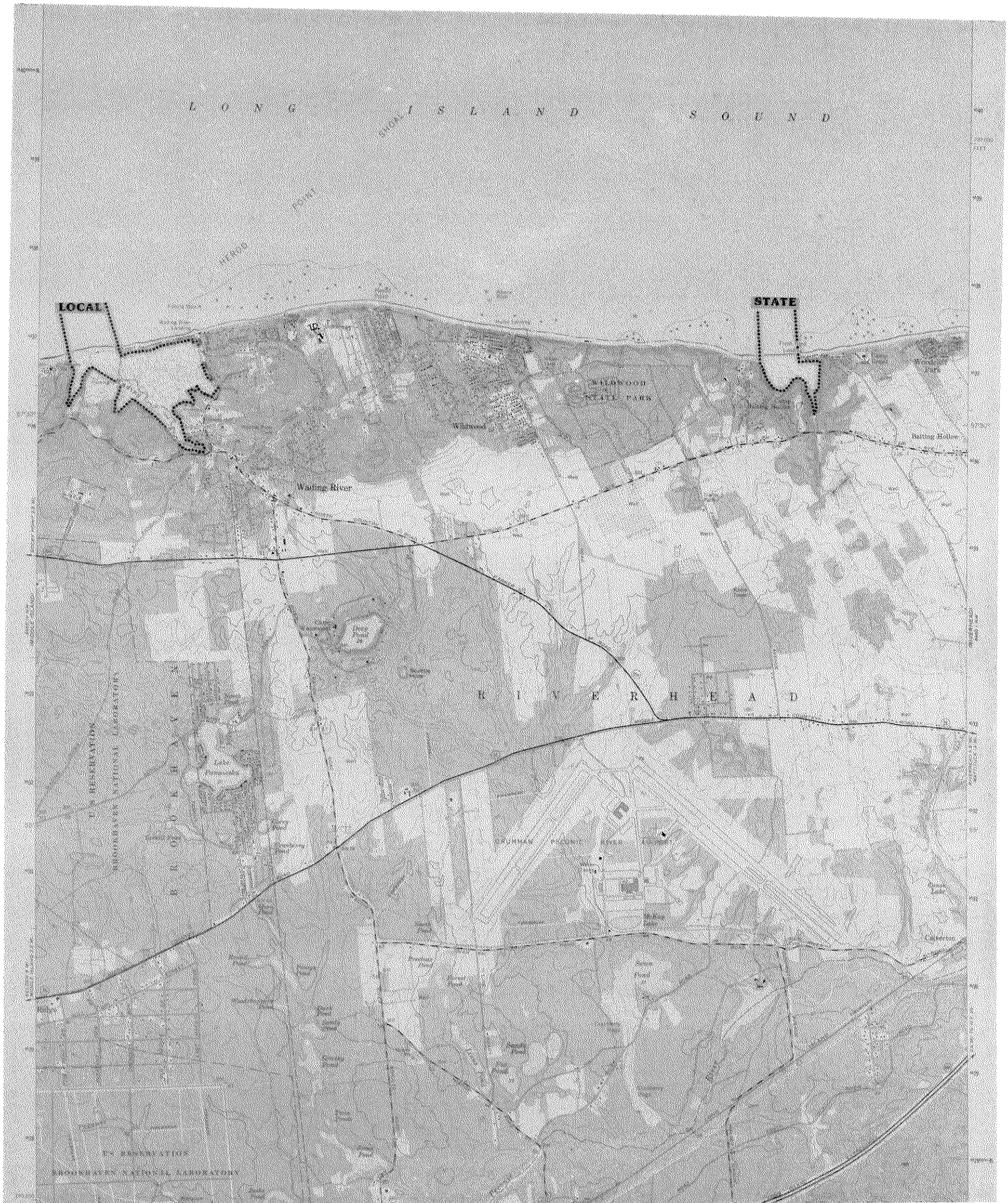
QUADRANGLE
PORT JEFFERSON
NEW YORK



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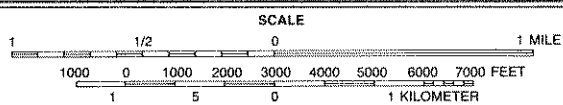
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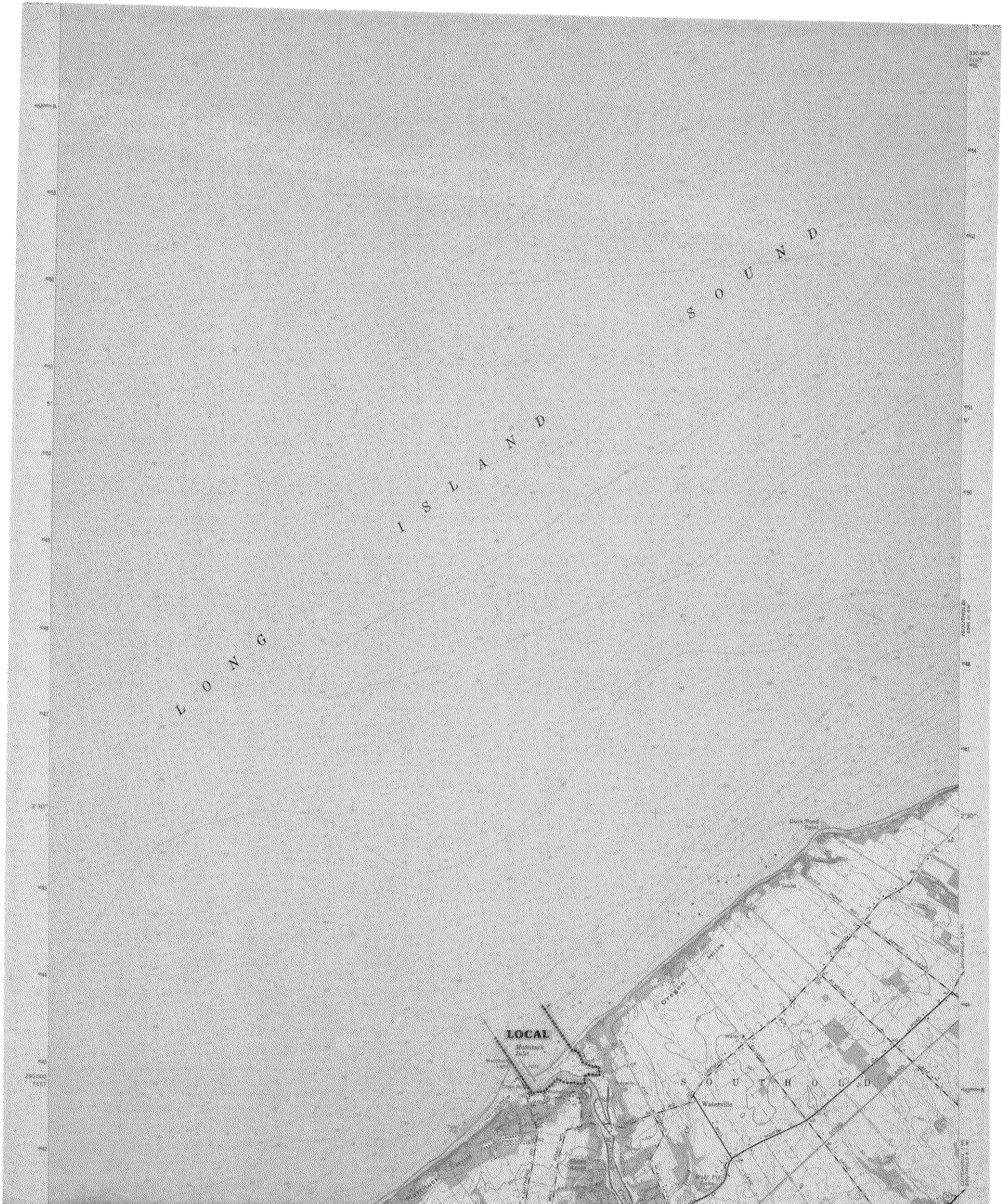
QUADRANGLE
WADING RIVER
NEW YORK



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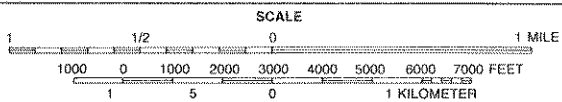
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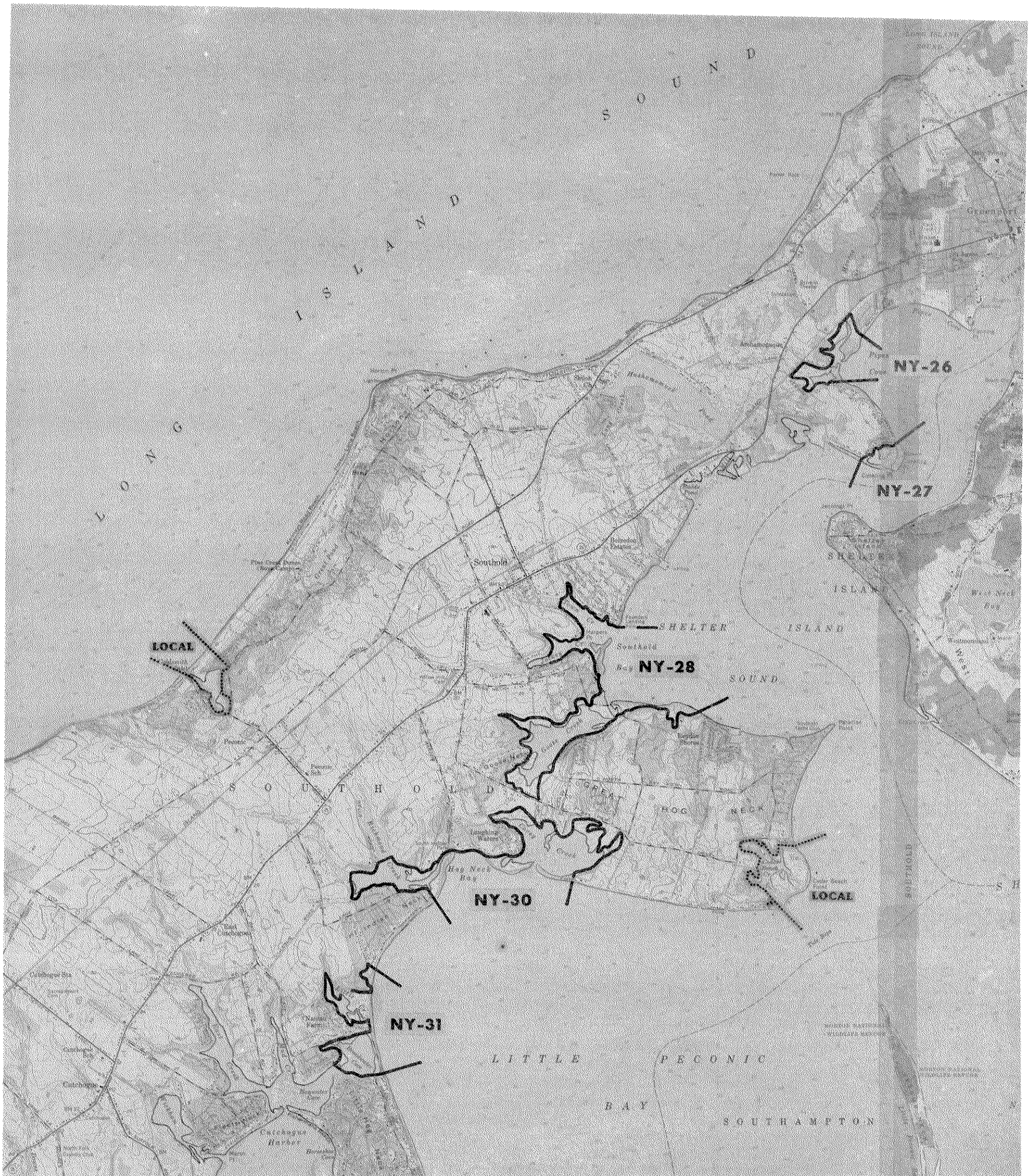
QUADRANGLE
MATTITUCK HILLS
NEW YORK



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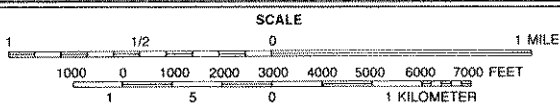
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QUADRANGLE
SOUTHOLD
NEW YORK



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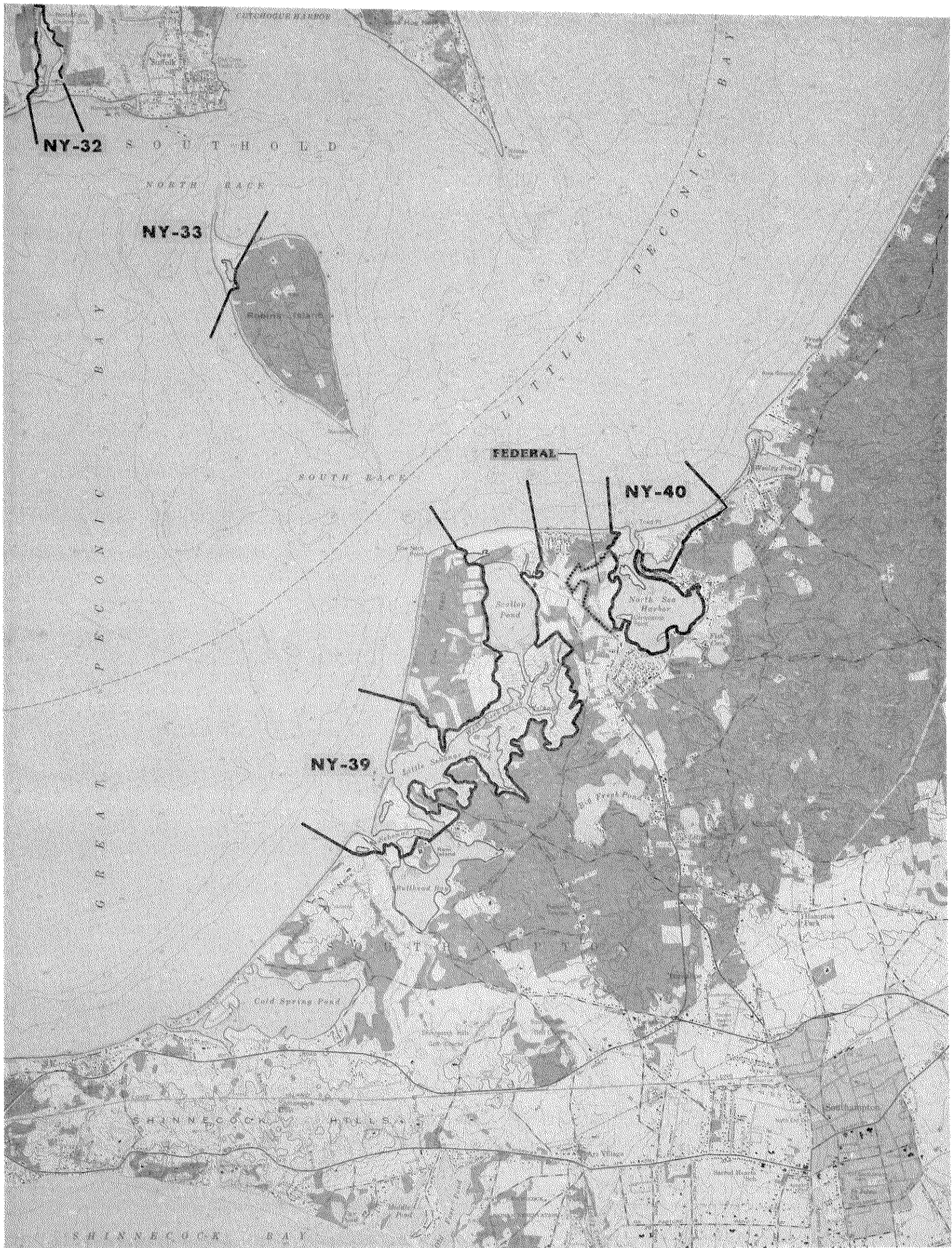
NY-26 - PIPES COVE

State Position: The State of New York supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: One comment was received suggesting that this unit be expanded to include Moore's Woods. This comment appears in letter number 1282 reprinted under NY-24.

Response: Moore's Woods is part of the mainland and does not qualify for addition to the CBRS.

DOI Recommendation: The DOI recommends adding NY-26 to the CBRS as delineated here to exclude Moore's Woods.



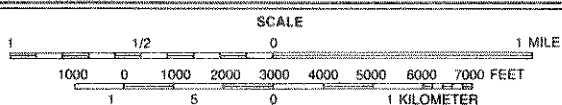
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QUADRANGLE
SOUTHAMPTON
NEW YORK



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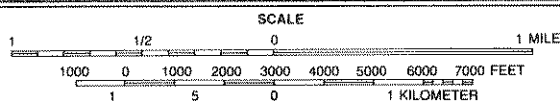
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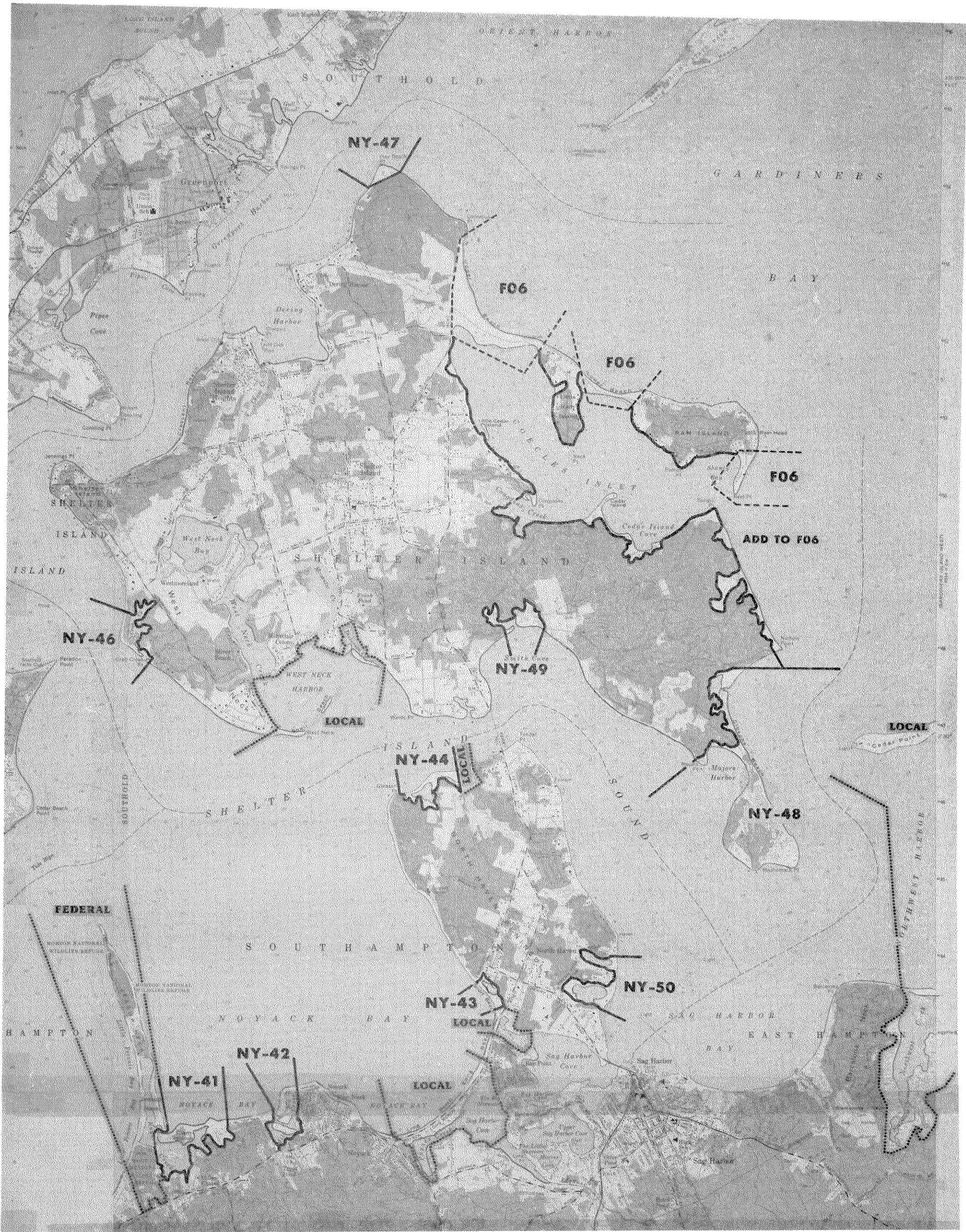
QUADRANGLE
MATTITUCK
NEW YORK



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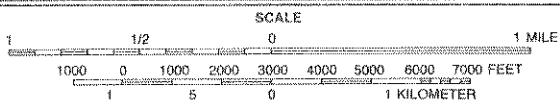
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QUADRANGLE
GREENPORT
NEW YORK



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NY-43 - SAG HARBOR; NY-44 - GLEASON POINT

State Position: The State of New York supports the CBRS expansion; however, no position on these particular units was expressed.

Other Comments: One letter was received supporting the addition of these two units

to the CBRS. It is reprinted in the General Comment Letters section (letter number 1175).

DOI Recommendation: The DOI recommends adding NY-43 and NY-44 to the CBRS.

NY-50 - FRESH POND

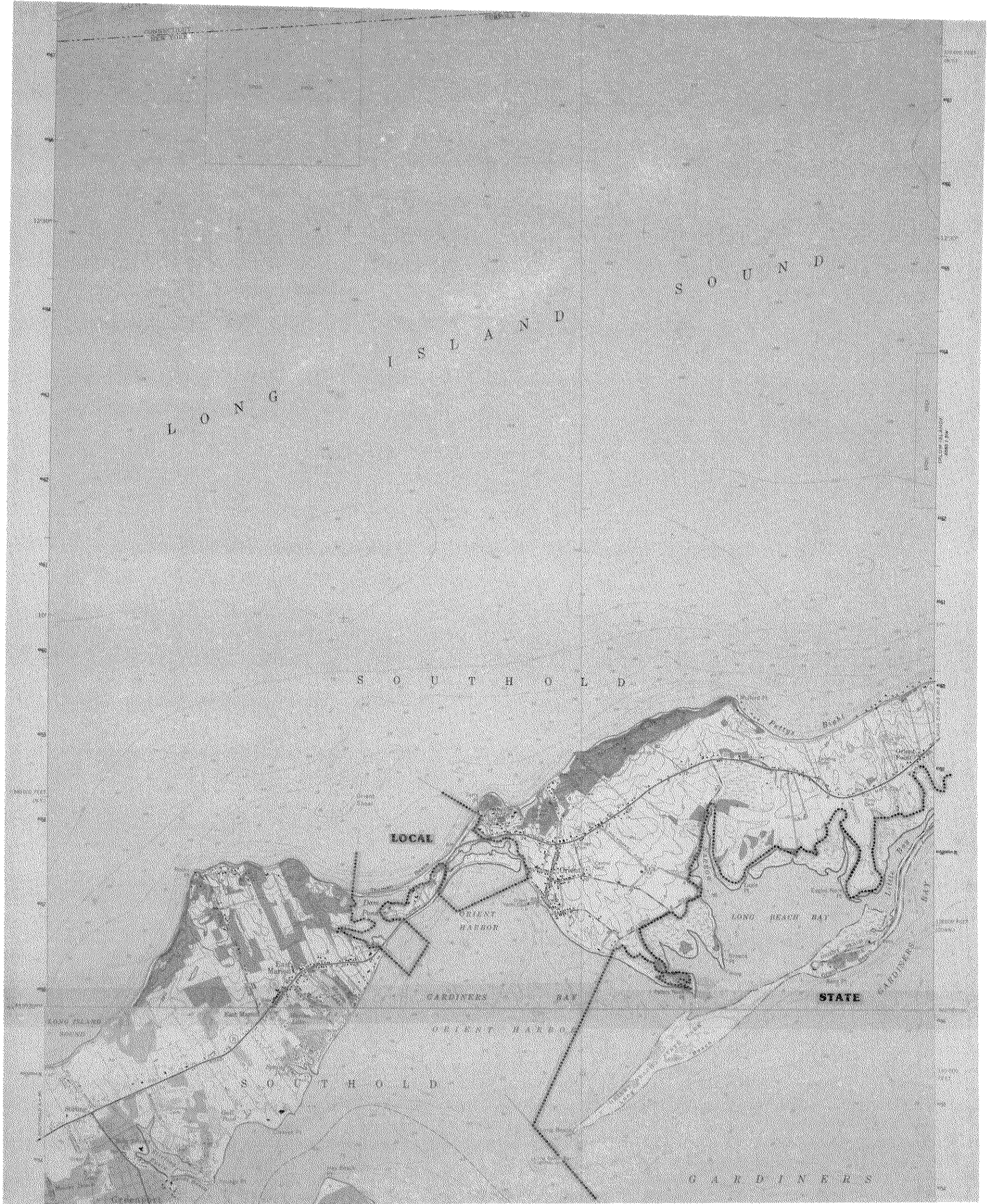
State Position: The State of New York supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: One letter was received suggesting that an additional barrier area to the north of Fresh Pond also might qualify for addition to the CBRS. The letter is

reprinted in the General Comment Letters section (letter number 1175).

Response: This area does fully qualify for addition to the CBRS under DOI criteria.

DOI Recommendation: The DOI recommends adding NY-50 to the CBRS as delineated here to include the additional barrier area.



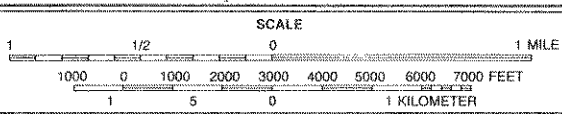
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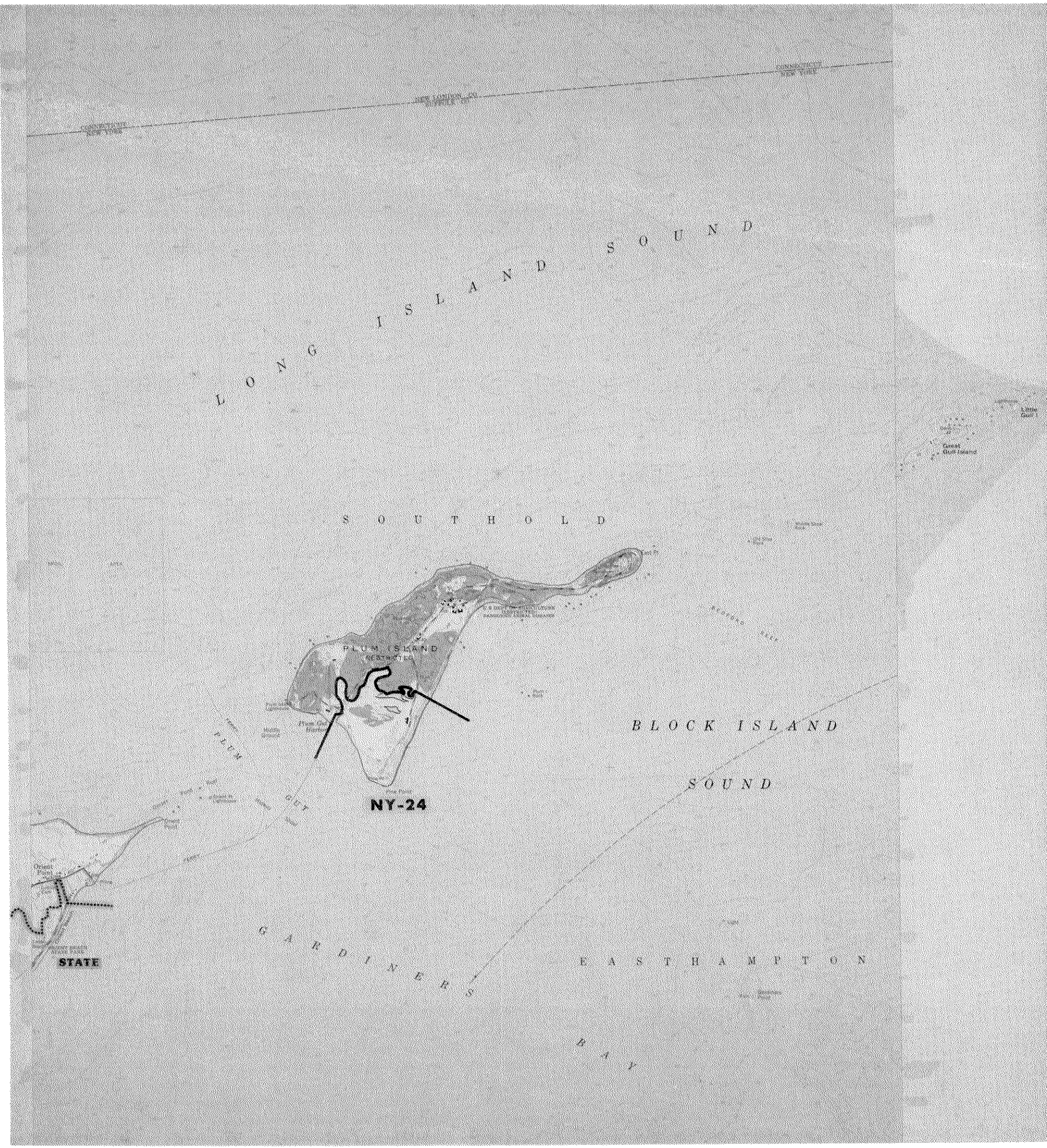
QUADRANGLE
ORIENT
NEW YORK



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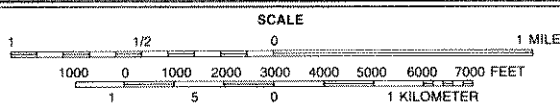
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QUADRANGLE
PLUM ISLAND
NEW YORK



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State Position: The State of New York supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: One letter was received suggesting the outcrop rocks and spit at Orient Point should also be included in this proposed CBRS unit. It is reprinted below.

Response: The outcrop rocks at Orient Point do not meet DOI definitions of a coastal barrier, and the spit is less than 0.25 miles in shoreline length; therefore, neither area is qualified for addition to the CBRS.

DOI Recommendation: The DOI recommends adding NY-24 to the CBRS as delineated here to exclude Orient Point.



Working for the Nature of Tomorrow
NATIONAL WILDLIFE FEDERATION
 1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

1282

Coastal Barriers Study Group
 Department of the Interior
 National Park Service
 P.O. Box 37127
 Washington, D.C. 20013-7127

RE: Comments on the Coastal Barrier Resources Act--Section 10 Draft Report to Congress, 52 Federal Register 9618-9619

Dear Sir or Madam:

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society are writing in response to the Department of the Interior's Federal Register Notice of March 23, 1987 soliciting comments on the Draft Report to Congress: Coastal Barrier Resources System--Executive Summary.

Our organizations have a longtime interest in the conservation of coastal barriers. The Natural Resources Defense Council was the founding organization of the Barrier Islands Coalition in 1978. Likewise, the National Wildlife Federation, the Coast Alliance, and the Oceanic Society became members of that coalition in 1979 to help seek protection of coastal barriers.

Our organizations have led efforts to pass legislation which would conserve the natural resources of coastal barriers--first, the flood insurance prohibition in the Omnibus Reconciliation Act in 1981 and then, the Federal financial prohibition in the Coastal Barrier Resources Act (CBRA) in 1982. We continue to support the goals of CBRA and expansion of the Coastal Barrier Resources System (CBRS) throughout the United States and its territories. The federal government should not be subsidizing development in hazardous areas which destroys productive coastal ecosystems, endangers the lives and properties of shoreline residents, and costs federal taxpayers millions of dollars each year in flood insurance claims and disaster relief.

The need for an expanded Coastal Barrier Resources System in which federal development subsidies are prohibited is becoming increasingly critical in light of the projected rise in sea levels due to global warming. As water levels rise, so will the costs of protecting existing structures, the damages from erosion and flooding, and the risk to human life and property. Unfortunately, however, development in these unstable coastal areas continues to grow at a frightening pace. We feel strongly, therefore, that it is essential that the Department recommend maximum expansion of the System to include the eligible areas on all of America's coasts

- 2 -

before these sites are irrevocably committed to development. An appendix of specific comments on additions to and deletions from the System follow our general comments.

PROPOSED RECOMMENDATIONS FOR ADDITIONS TO OR DELETIONS FROM THE CBRS

We support the Department's recommendation to expand the definition of a "coastal barrier" to include landforms which function as coastal barriers in protecting the mainland and adjacent aquatic habitats, even if they are not composed of unconsolidated sediments as are barriers in the traditional definition. Use of this expanded definition in delineating CBRS units is consistent with the conservation goals of CBRA and would allow for the inclusion of such new geological formations as undeveloped beach rock, cemented dunes, fringing mangroves and associated coral reefs, cheniers, discontinuous outcrops of bedrock, and coarse glacial deposits. Since these areas serve the same function as coastal barriers and are as vulnerable to development pressure, sea level rise, and storm damage as traditionally-defined coastal barriers, it is appropriate that they also be protected within the System.

APPENDIX

COMMENTS ON SPECIFIC COASTAL BARRIER AREAS

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society endorse the inclusion of all undeveloped coastal barriers identified by the Department of Interior in the March 1985 inventory, as well as some additional areas mentioned below. Following are our comments on some of the specific areas.

New York

We endorse the Department's proposal to include areas along the Long Island Sound within the System. In addition to the importance of protecting the few undeveloped coastal areas left in this highly developed region, the serious problems of groundwater contamination and lack of solid waste disposal sites on Long Island make discouragement of further development and population growth critical.

NY-24 Plum Island

The beachspit and outcrop rocks at Orient Point should also be added to this unit.

NY-26 Pipes Cove

This unit should be expanded to include the area to Moore's woods.



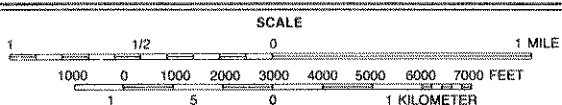
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QUADRANGLE
NEW LONDON
NEW YORK



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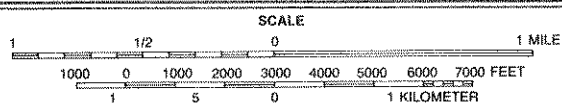
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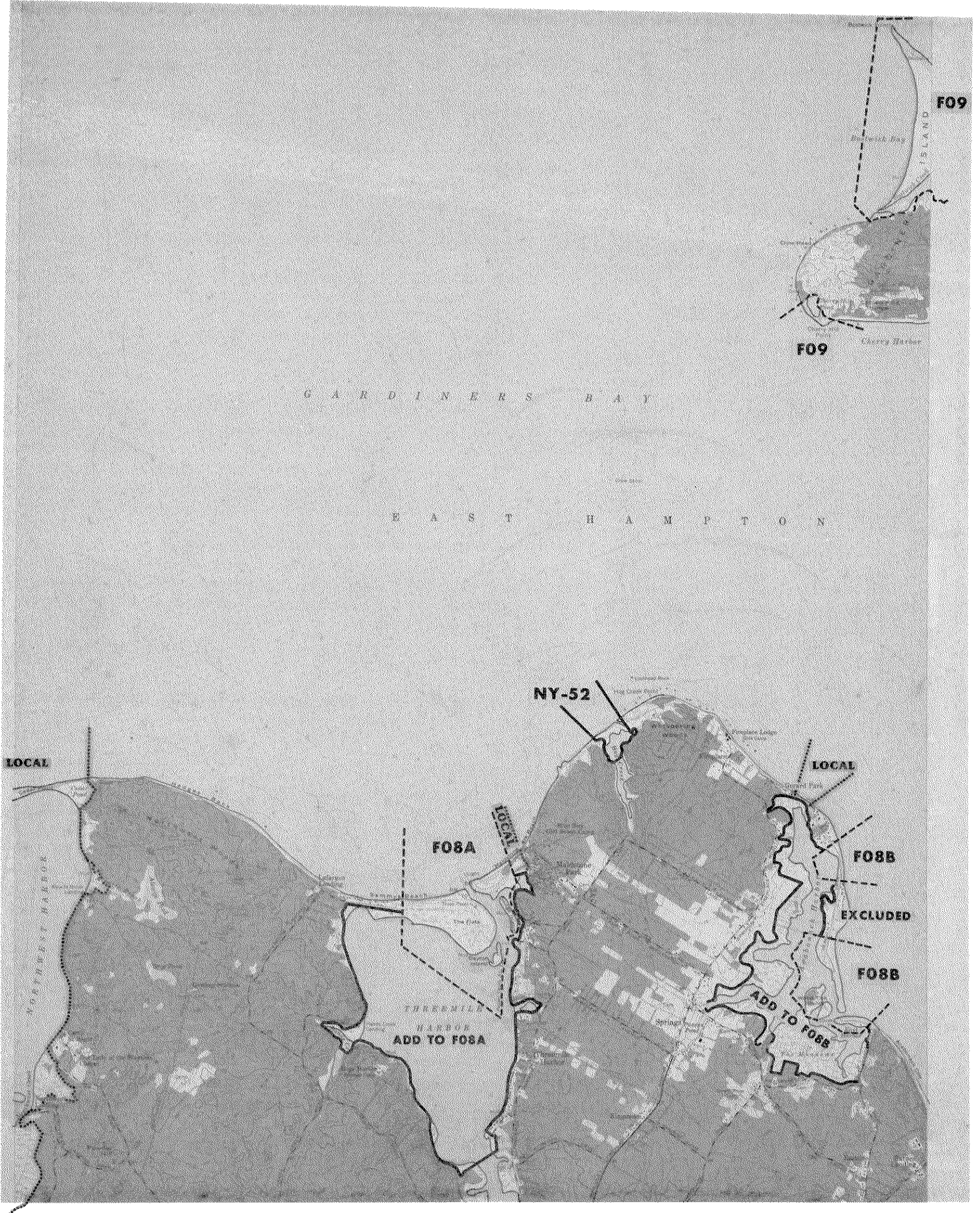
QUADRANGLE
MYSTIC
NEW YORK



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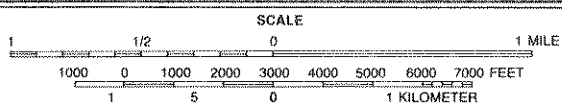
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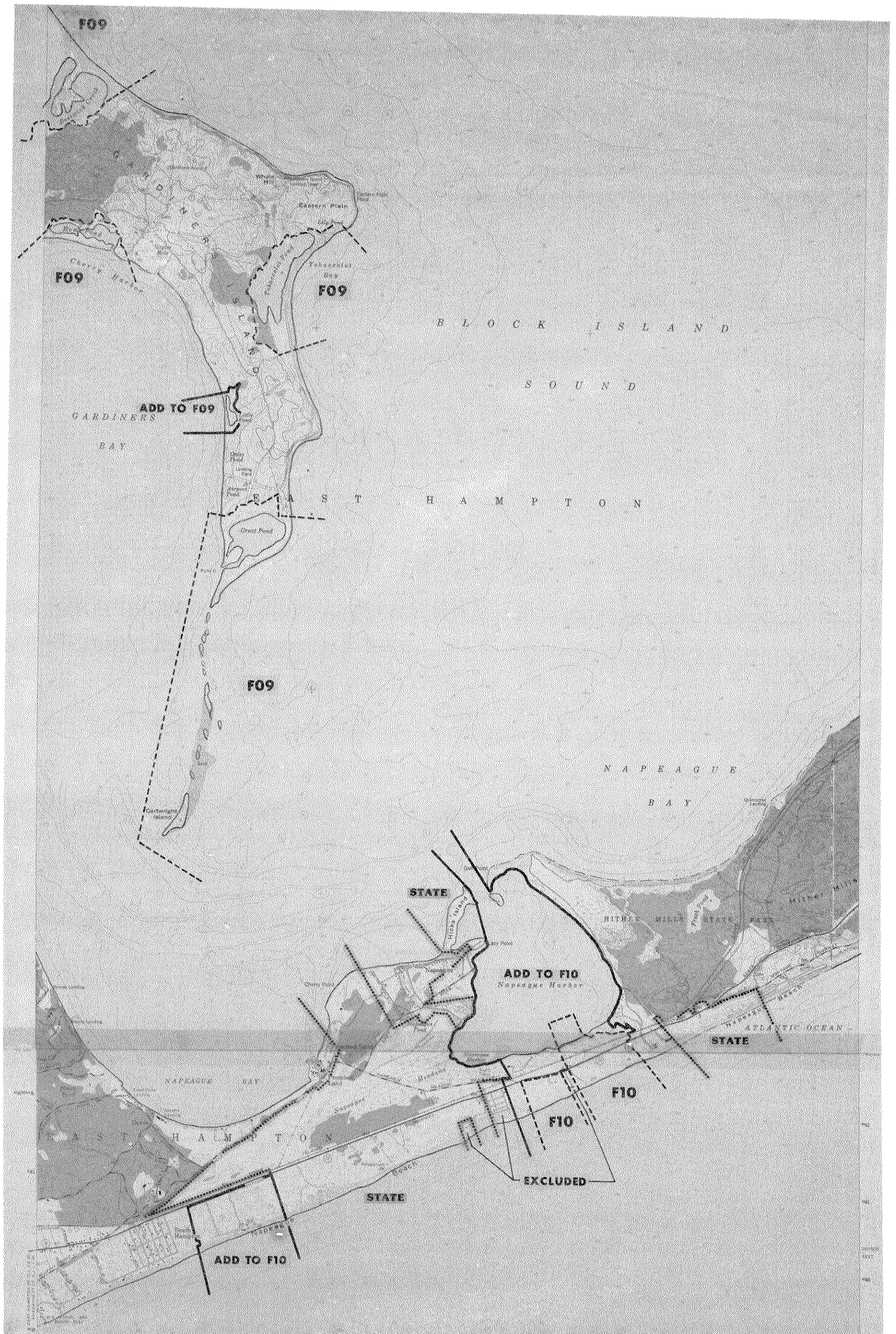
QUADRANGLE
GARDINERS ISLAND WEST
NEW YORK



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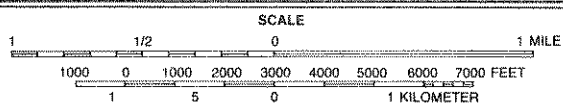
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



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QUADRANGLE
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F10 - NAPEAGUE

State Position: The State of New York supports the CBRS expansion; however, no position on this particular CBRS unit was expressed.

Other Comments: One letter was received suggesting that the Napeague Dunes area, east of existing F10, should be added to the CBRS. It is reprinted in the General Comment Letters section (letter number 1105).

Response: The Napeague Dunes area does qualify for addition to the CBRS under DOI criteria.

DOI Recommendation: The DOI recommends adding the Napeague Dunes area and the associated aquatic habitat to CBRS unit F10.



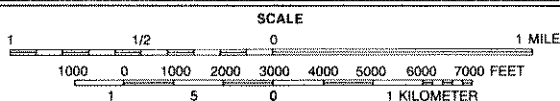
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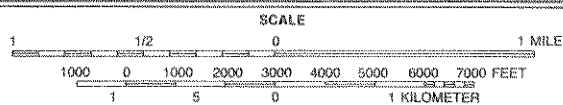
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EAST HAMPTON
NEW YORK



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NY-56 - AMAGANSETT; NY-57 - GEORGIA/WAINSCOTT PONDS

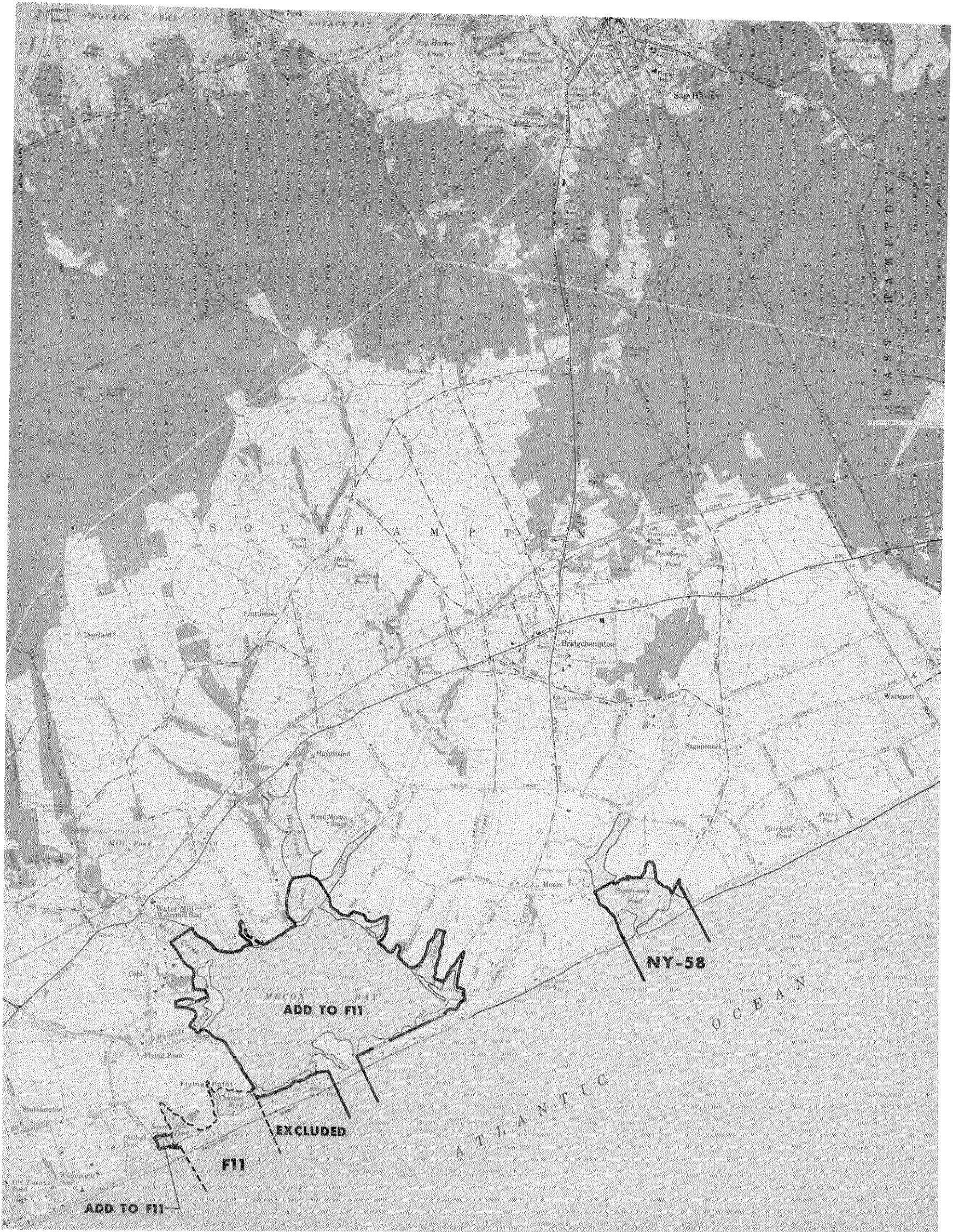
State Position: The State of New York supports the CBRS expansion; however, no position on these particular proposed units was expressed.

Other Comments: One comment was received informing DOI that the Georgia and Wainscott barriers are privately owned and requesting that they be added to the CBRS. This comment appears in letter number 1105 reprinted in the General Comment Letters section.

Response: The Georgia and Wainscott barriers were mistakenly identified as locally pro-

tected in the 1987 Draft Report. They are privately owned and fully qualify for addition to the CBRS under DOI criteria. All of the Amagansett barrier was mistakenly identified as federally protected in the 1987 Draft Report; however, only part of that proposed unit is included in the National Wildlife Refuge. The unprotected part of the barrier fully qualifies for addition to the CBRS.

DOI Recommendation: The DOI recommends that NY-56 and NY-57 be added to the CBRS as delineated here.



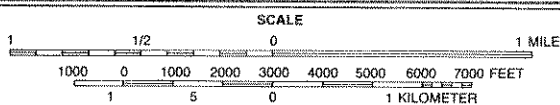
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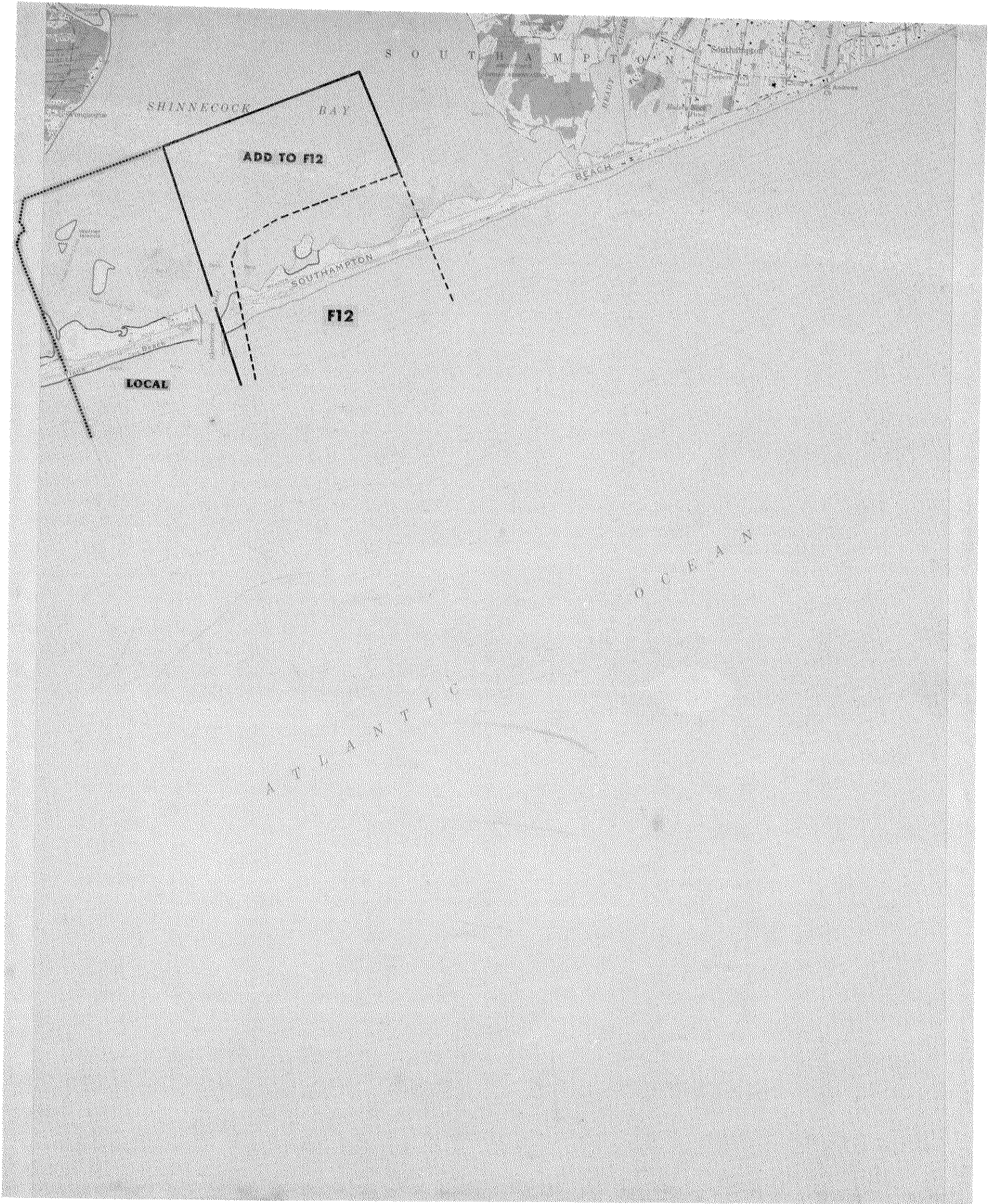
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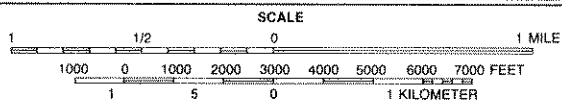
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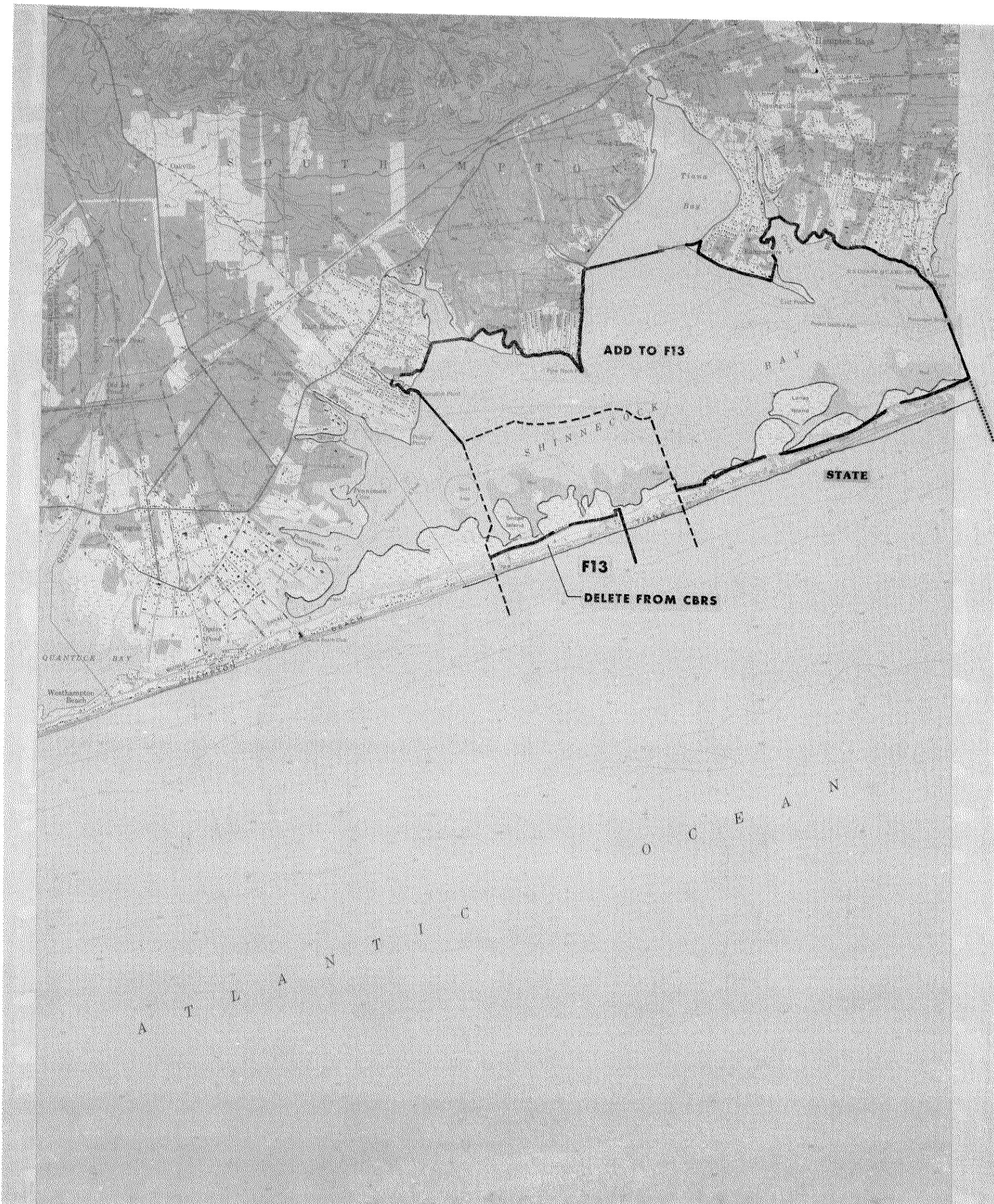
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SHINNECOCK INLET
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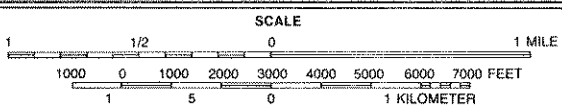
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Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
QUOGUE
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F13 - TIANA BEACH

State Position: The State of New York supports the CBRS expansion; however, no position on this particular CBRS unit was expressed.

Other Comments: One letter was received requesting that the DOI revise the proposed boundaries of associated aquatic habitat recommended for addition to this unit to exclude an aquafarm area, a spoil area, and some marinas. This letter is reprinted below.

Another letter was received suggesting that the proposed deletion of a developed area from F13 in the 1987 Draft Report was based on an overly restrictive interpretation of DOI's definition of development (at least one structure/5 acres). This letter is reprinted in the General Comment Letters section (letter number 1105).

Response: The spoil area and the marinas both represent heavily modified habitats and the DOI has revised the recommended boundaries of the associated aquatic habitat to exclude them. The aquafarm area is included within the proposed boundaries; Federal funds can be used for aquaculture

activities that are consistent with the purposes of the CBRA.

In 1985, at the request of a private landowner, the DOI also revised the delineation of the fastland portion of F13. When CBRA was enacted in 1982, no aerial photographs of this area were available. In February 1983, aerial photographs were acquired. The Department confirmed the existence of about 20 structures in a fastland area about 80 acres in size at that time and grants their existence in October 1982.

The DOI's definition of development applies to fastland only, not fastland and associated aquatic habitat as the commenter assumed. The density of development in the 1983 photograph of the unit (about 1.25 structures/5 acres of fastland) clearly meets DOI's definition.

DOI Recommendation: The DOI recommends deleting the 80-acre developed area from the existing CBRS unit because the development existed in 1982. The DOI also recommends adding the associated aquatic habitat to the unit as delineated here to exclude the modified marina and spoil areas.

1093

WILLIAM H SWAN
ATTORNEY AND COUNSELLOR AT LAW
48 MAIN STREET, HAMPTON BAYS
NEW YORK 11946

810 RA 6 (200-130)

June 19, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service -- 498
P.O. Box 37127
Washington, D.C. 20013-7127

Attn: Mr. Frank McGilvrey

Re: Report to Congress:
Coastal Barrier Resources System
Proposed Recommendations for
Additions to or Deletions from
the Coastal Barrier Resources System
CBRS F-13

Dear Mr. McGilvrey:

Enclosed are copies of my two letters of June 12, 1987 to my Congressman, Hon. George J. Hochbrueckner with whom I that day met. Therein I have commented on your proposed deletions and additions to Unit F-13, Southampton, New York, of the Coastal Barrier Resources System. Also enclosed are the materials that accompanied that letter:

- 1) October 20, 1982 letter to Senator Moynihan;
- 2) September 30, 1985 letter of Daren Rathkopf;
- 3) National Wetlands Inventory Map (marked);
- 4) Unit F-13 map (marked);
- 5) U.S. Fish and Wildlife publication,
Restless Ribbons of Sand;
- 6) New York State D.E.C. Tidal Wetlands Map 704-520;
- 7) New York State D.E.C. Tidal Wetlands Map 706-520.

Coastal Barriers Study Group

June 19, 1987

In addition to the materials furnished Congressman Hochbrueckner, I include for your inspection an airview of Lockwood, Kessler and Bartlett dated March 24, 1984 on which I had marked the fastland and dug basins that constitute improved marinas, aqua farms and recreational facilities that are adjunct to the fastland on the south side of Dune Road which was improved in 1982 to a degree that excluded it from inclusion in this Coastal Barrier Resources System.

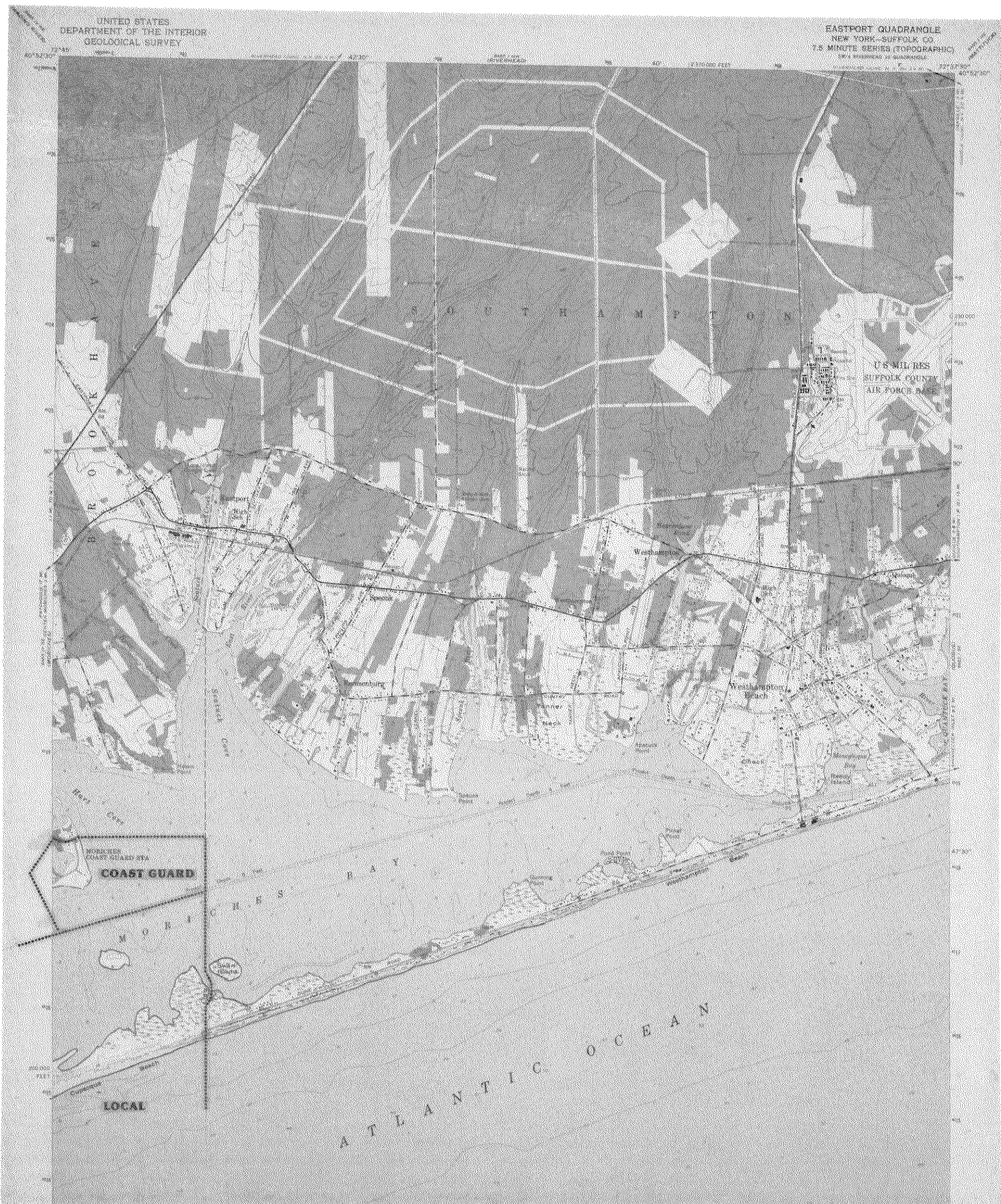
In addition I am enclosing a xerox copy of an airview furnished by you on which I note areas marked in red representing improvements on the north side of Dune Road which are excluded from the system because of improvement, and other areas marked in blue which should have the same treatment. These areas show in greater particularity on the also enclosed Lockwood, Kessler and Bartlett aerial photography.

Sincerely,

William H. Swan
William H. Swan

MHS:esb
Encl.

cc. Hon. George J. Hochbrueckner



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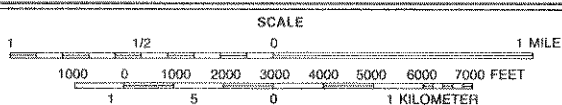
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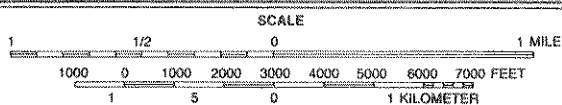
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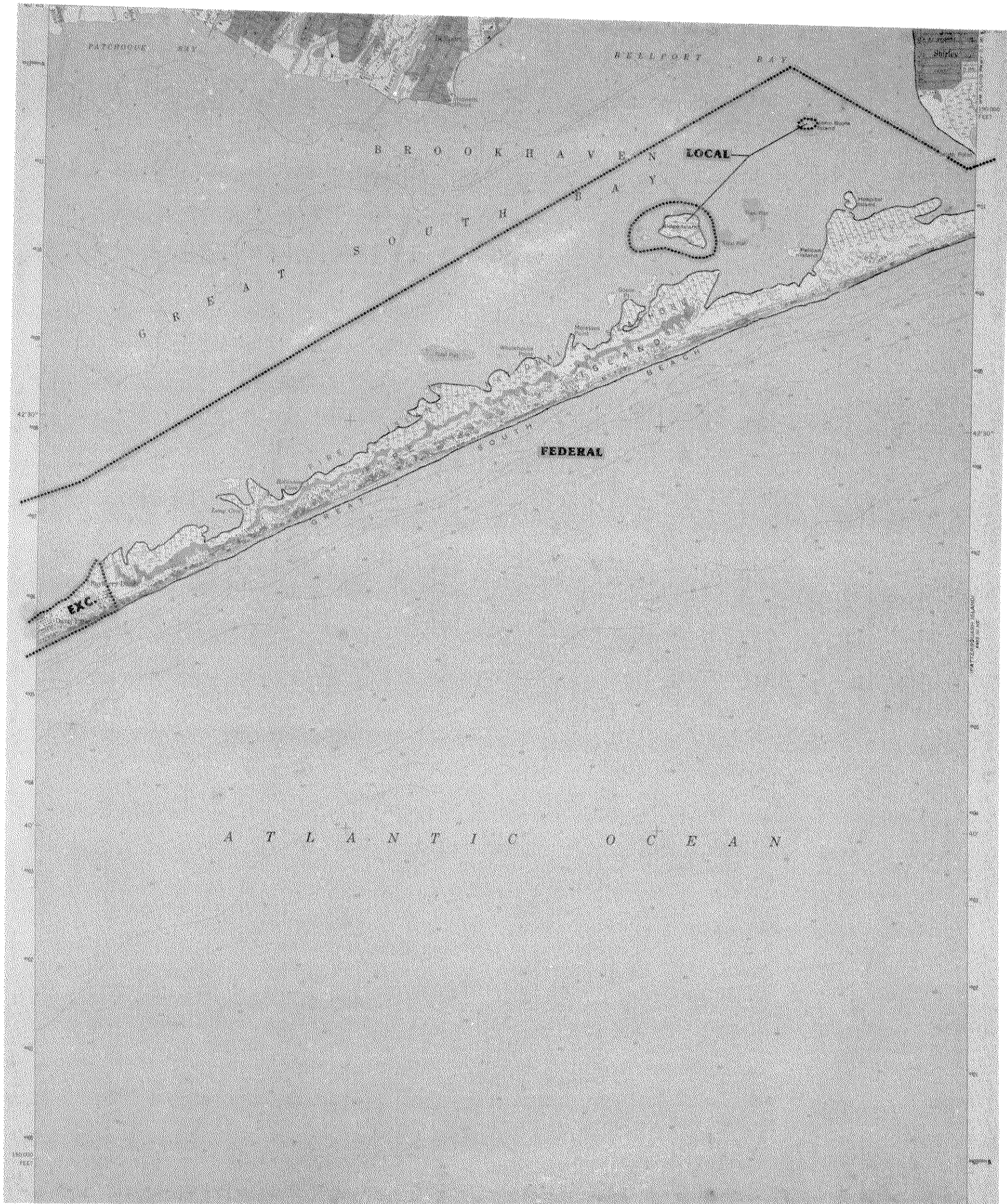
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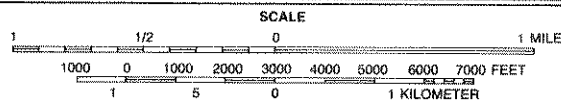
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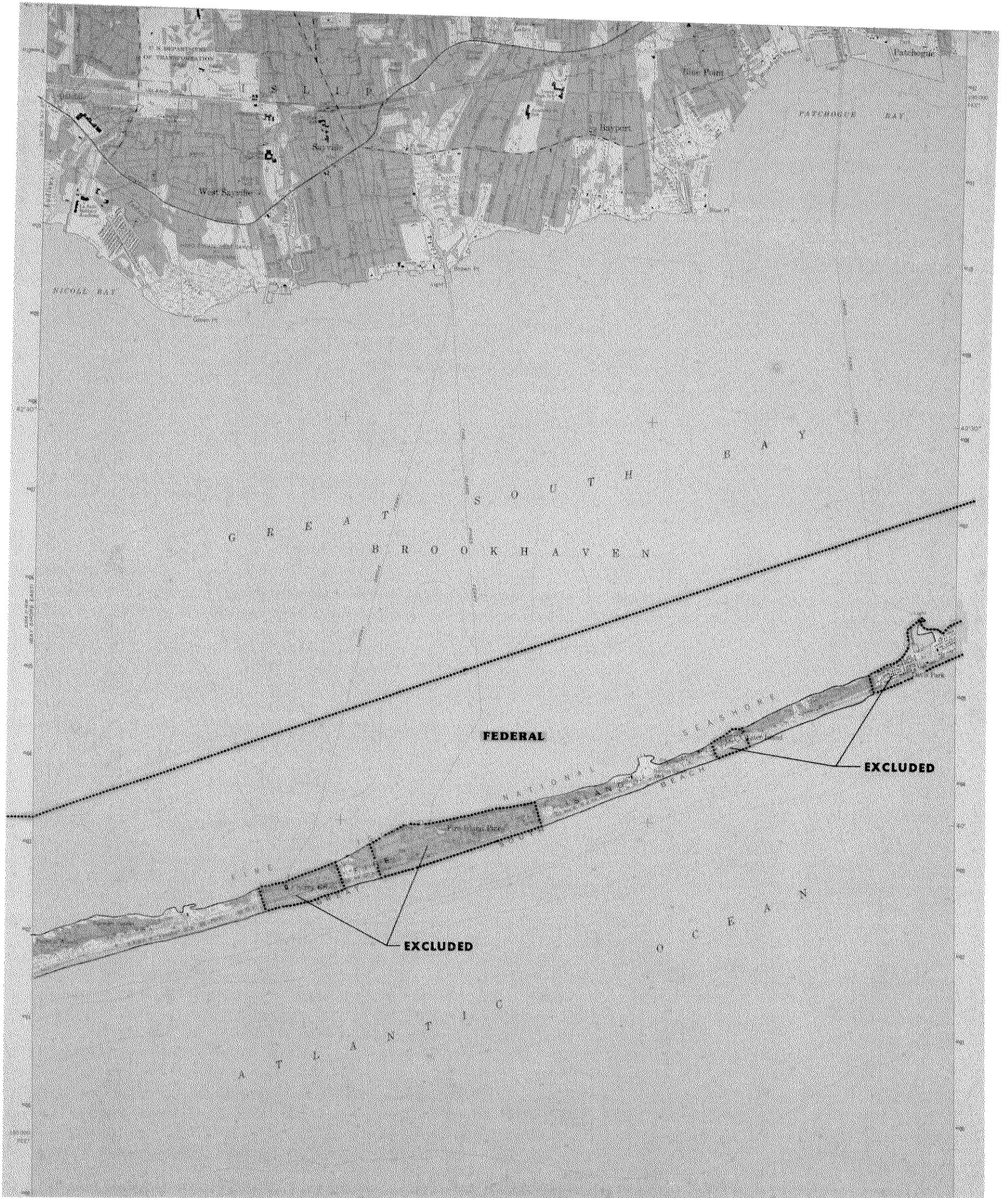
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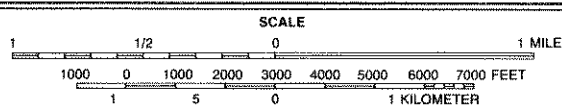
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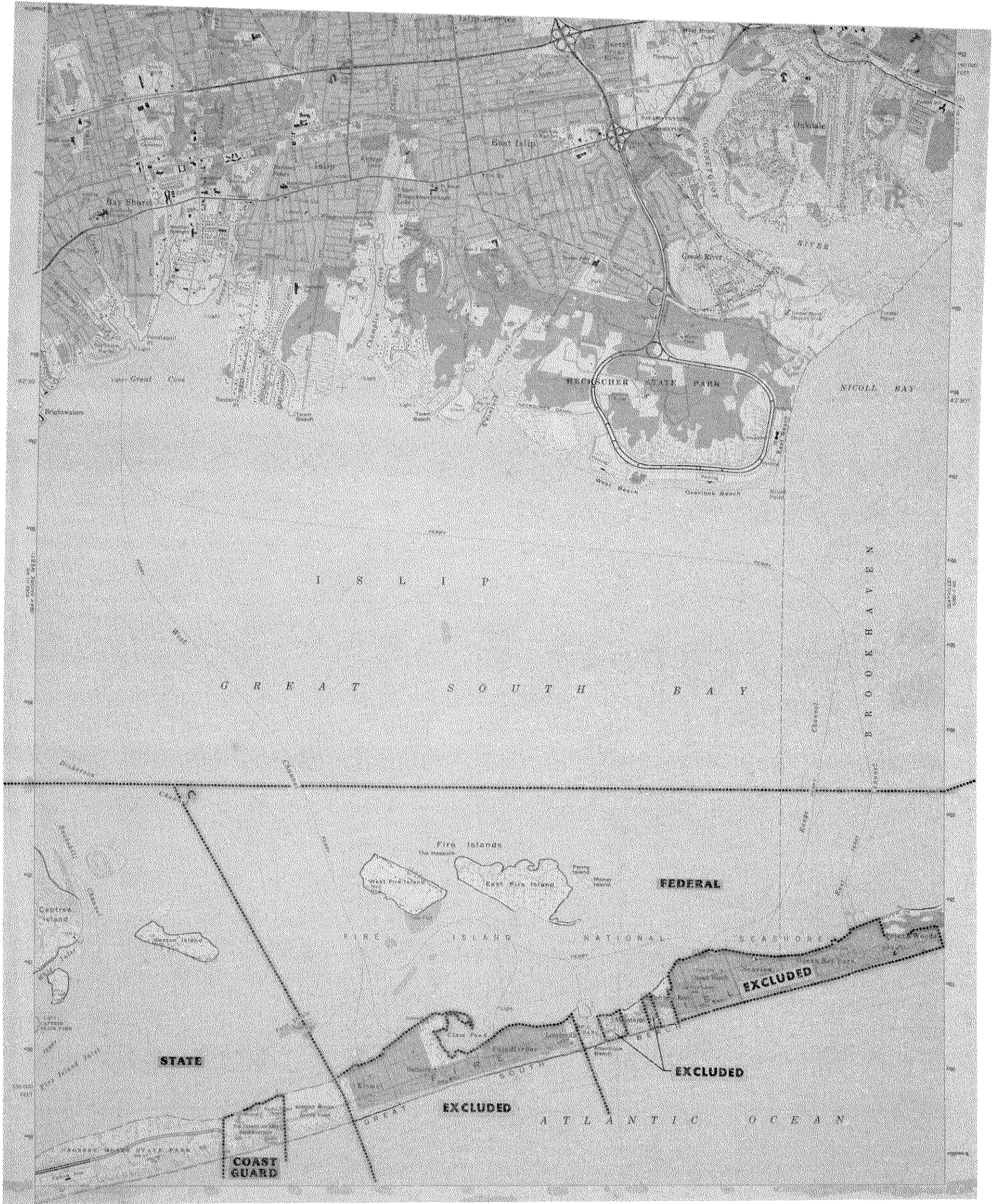
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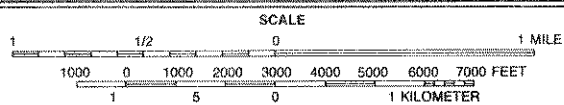
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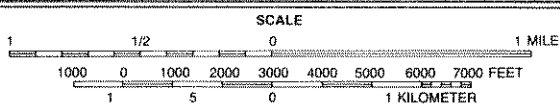
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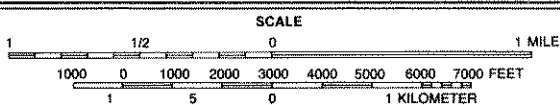
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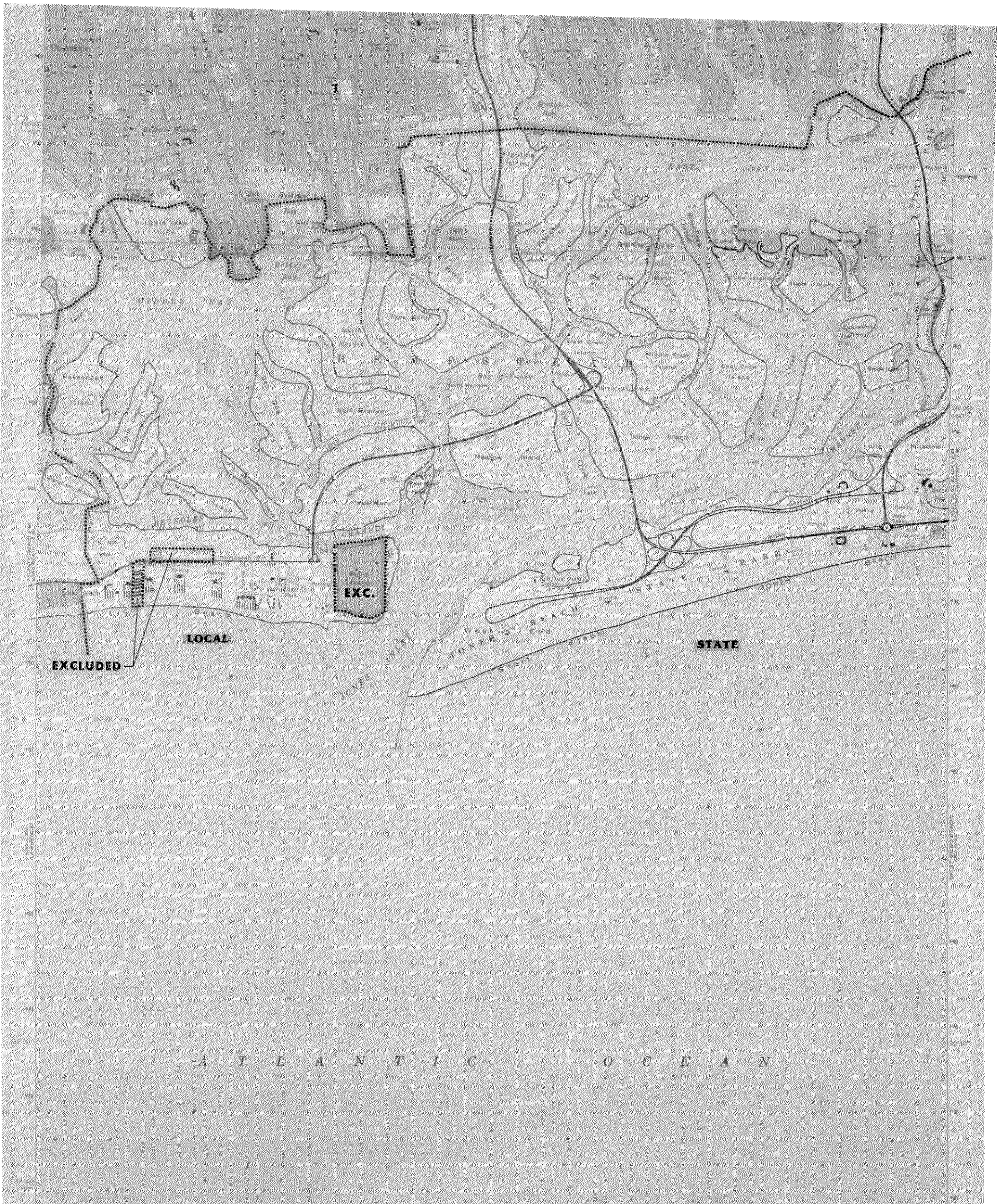
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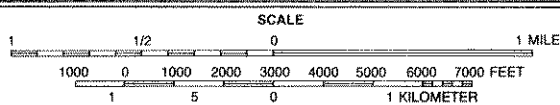
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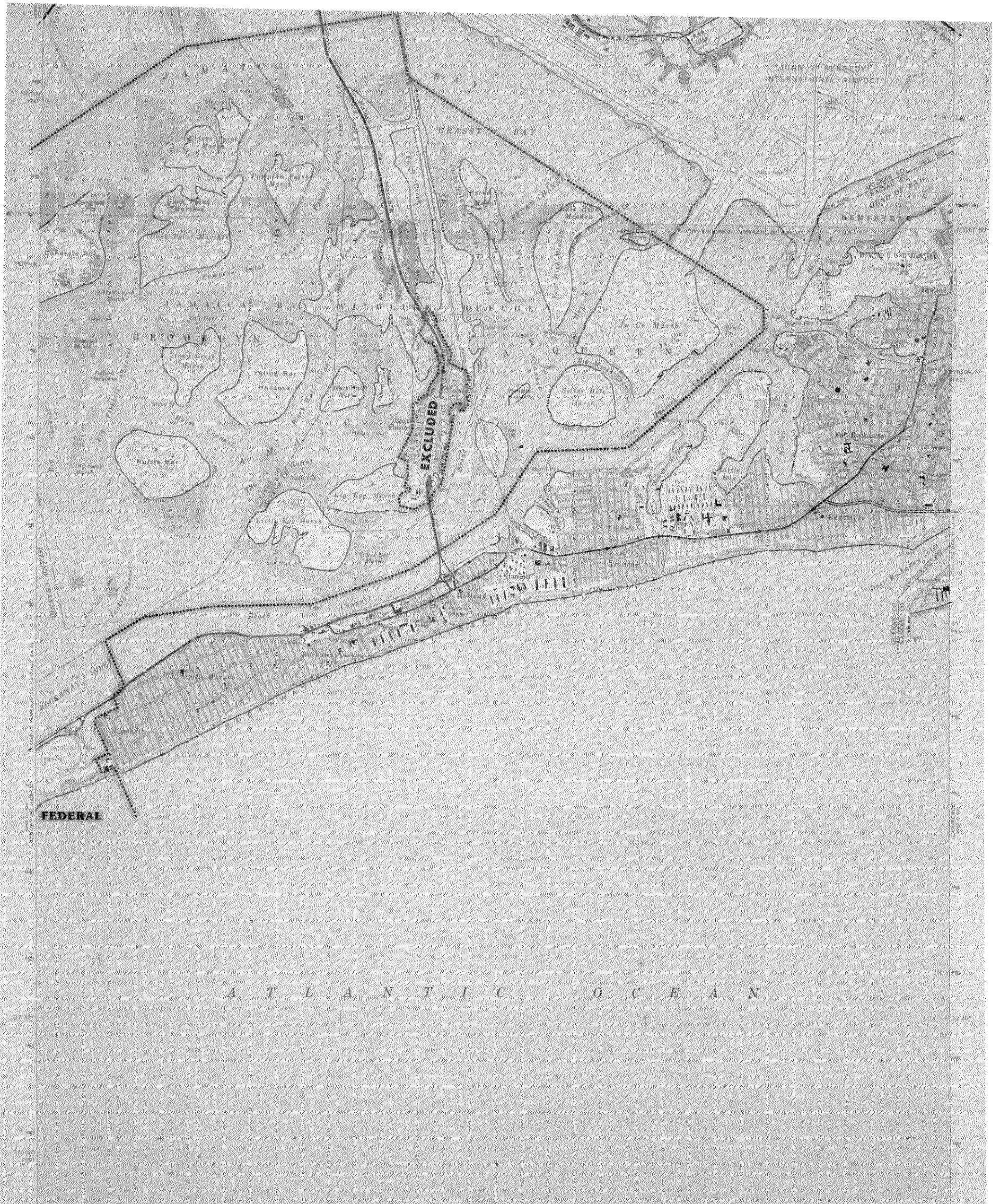
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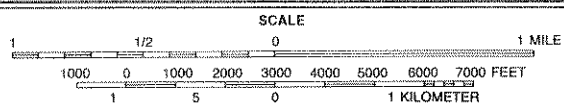
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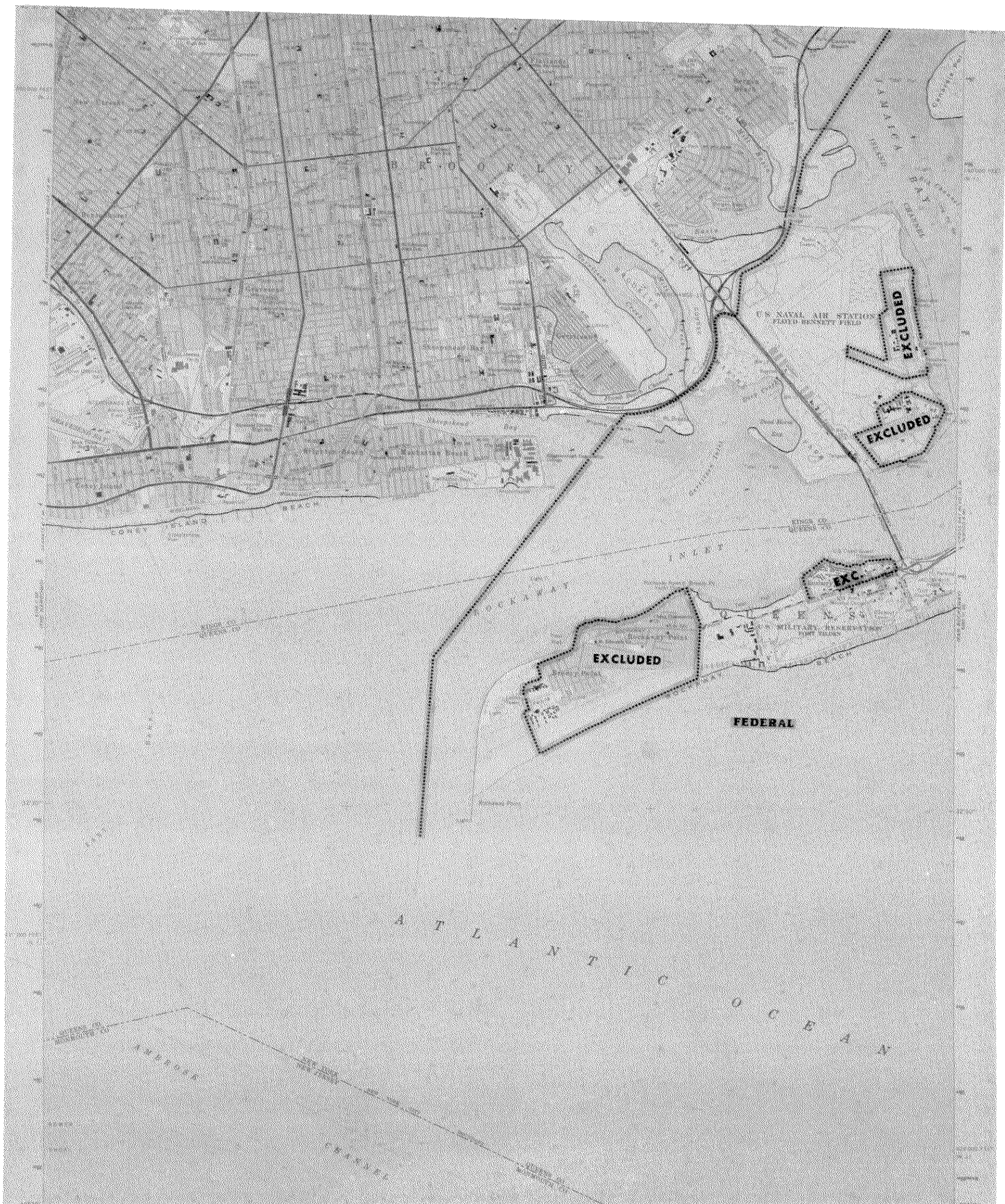
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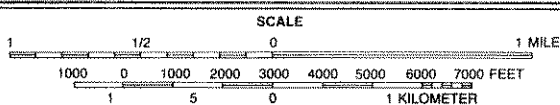
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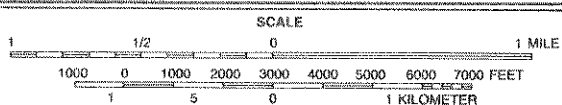
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ARTHUR KILL
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