

April 24, 2015

Jennifer Nersesian, Superintendent
Gateway National Recreation Area
ATTN: Ft. Tilden EA Comments
210 New York Avenue
Staten Island, NY 10305

Dear Superintendent Nersesian,

I am writing on behalf of the Birder's Coalition for Gateway to provide comments for your consideration in scoping the Shoreline Resiliency Environmental Assessment for Ft. Tilden.

Ft. Tilden is a favored destination for many thousands of birds and many hundreds of birders. During spring and summer (April – August), the beach provides vital habitat for beach-nesting and migratory shorebirds and loafing seabirds. The area is especially attractive during the fall (August to November) for migrant land birds and raptors. The location of Ft. Tilden on the barrier island serves to concentrate migrating land birds, which orient to the coastline during their migration. These birds use the area in great numbers as a stopover point, so it is important to preserve and enhance a diversity of natural habitats and ensure that there are supplies of fresh water in the area available to the migrating birds.

Our primary concerns and recommendations about rebuilding Shore Road at Fort Tilden address habitat issues for species of greatest conservation need and safety issues for the birders who enjoy them:

1. New York City Audubon has been monitoring oystercatchers nesting on Breezy Point for the past four years. American Oystercatchers (a species of conservation concern) and Piping Plovers (an endangered species) often nest in close proximity to each other. Post-Sandy, oystercatchers have been nesting in the area where the road had been (see map). Young birds can be seen running along the surrounding beach as they get ready to fledge. NPS birds have experienced a significant increase in productivity, from 0.59 in 2011 to 1.24 in 2014. At a recent oystercatcher/waterbird workshop in Connecticut, we learned that NYC's oystercatcher population on Breezy Point has highest nest productivity in the region! Anecdotally, a pair of Piping Plovers were observed in 2013, investigating nest sites in that area as well. Our concern is that paving the road will decrease the available habitat and result in a decline in productivity for oystercatchers and possible limitation of nest space for plovers.
2. Shore Road runs parallel to the ocean. This road was heavily damaged and partially destroyed by Hurricane Sandy. Replacing the road – repairing and paving – will not prevent another major storm from washing it away again. The

importance of this road, as we understand, is to serve as an emergency evacuation route for people out on Breezy Point Tip. But if the road washes out again, how can it serve its purpose? We strongly recommend an alternate (emergency) route be found that avoids the beach and the dunes.

If a new road is to be constructed, we have the following recommendations:

1. Parking should not be allowed along the road.
2. The road should be gated and closed during the breeding season (March through) mid-August.
3. The road should be unpaved.
4. The road should run from the western access point of the park and dead end at least 1000 feet west of Battery Harris East.
5. Alternatively, to address evacuation concerns, the road should be one lane one-way eastbound.

Other suggestions that benefit birds, passive recreation activity (e.g. bird watching), and creates resilience in Fort Tilden include:

1. Reinforce some of the dune structures by creating a network of roots: planting native vegetation. Examples of beneficial native plants include Pitch Pine, American Holly, Red Cedar, Black Cherry, and Seaside Goldenrod. Virginia Pine and Panic Grass formerly grew at Ft. Tilden and are rare on Long Island.
2. Invasive vegetation should be actively managed and native plantings should be done throughout the park including the brushy areas surrounding the ball fields and park buildings.
3. Derelict building should be demolished and the areas restored to natural habitat.
4. Battery Harris East currently has access via a stairway and platform, and is a premier spot to watch migrating hawks and other raptors. It also provides wonderful views. Access should be preserved and maintained. An interpretive sign should be erected discussing hawk migration.
5. The existing small freshwater pool in the dunes south of Battery Harris East should be preserved and enhanced for bird use by enlarging it slightly to provide some shallow shoreline area. Fringing vegetation should be maintained. The path should be moved back and a bird blind constructed. An interpretive sign should be erected discussing bird migration.
6. However, several plants that are unusual or rare on Long Island occur near the path adjacent to the pool and elsewhere in the area. This should be taken into consideration in any construction activities. These plants include *Agalinis purpurea*, *Eupatorium pilosum*, and *Spiranthes cernus* (an orchid). These species are unusual in occurrence or habitat. There is also *Equisetum hyemale* along the drier stretches of the path. This plant is very rare on Long Island. In addition, it should be noted that Ft. Tilden has one of the best populations of *Prunus maritima* (Beach Plum) on Long Island.

7. The community garden should be preserved and enlarged if possible. This area is attractive to migrating birds as a source of food and water.
8. Create a system for permitted parking by local birders and naturalists, in which they can park safely in the specified area without having to track down a ranger every time they come. Most birders will be at the park long before the office are open. We recommend that the NPS issue seasonal "passive recreation" passes, either free of charge or for a small fee, for specific activities such as birding, hiking, jogging, biking. To ensure the passes are not overused by people seeking beach access, they could be made invalid during the mid-day hours (for example noon to 3 p.m.).
9. We are aware of proposals by fishermen and community residents to replace the road or rebuild it on the existing gravel paths/former roadways that run through the park between the ballfield area and the western end. We are concerned that this proposal would irrevocably change the natural character of the area in which passive forms of access are now very attractive. We do not think that a roadway through the area is particularly consistent with resiliency. If a new road is to be built it should be done in the most environmentally sensitive way by minimizing its footprint and ensuring it does not become a thoroughfare. We understand the fishing community's concern about access along the beach. Perhaps fishing access could be enhanced by providing limited parking at the end of the roadway at the eastern end of the park adjacent to the Riis Park Golf Course. In addition, we are sensitive to the local resident's concerns about emergency evacuation. We wonder however, how a road through the park would significantly enhance emergency access when a four-lane road is now available.

Thank you for considering our comments. We look forward to continuing our efforts with you to protect and enhance the Gateway National Recreation Area.

Sincerely,

Harry Maas, The Birders' Coalition for Gateway
Susan Elbin, New York City Audubon
Don Riepe, American Littoral Society
Robert Bate, Brooklyn Bird Club
Andrew Rubenfeld, Linnaean Society
Seth Ausubel, NY State Ornithological Association
Cliff Hagen, Protectors of Pine Oak Woods
Arie Gilbert, Queens Country Bird Club
Additional Coalition Members: Andrew Baksh, Judy Craig, Douglas
Futuyma, Kathryn Heintz, Darren Klein, Jeff Nulle, Sandi Paci, Peter Post,
John Shemilt, David Speiser, Lloyd Spitalnik, Nancy Tognan,
Lou Widerka, Angus Wilson

Map of American Oystercatcher nest locations, 2014:

