

To: DEP.R2@dec.ny.gov  
Cc: SICWF2017@gmail.com  
Re: Comment on Application # 2-6401-00287/00002 seeking an Article 24 Freshwater Wetlands Permit

Tamara A Greco  
NYSDEC Region 2 Headquarters  
47-40 21st St  
Long Island City, NY 11101

Dear Ms. Greco and DEC staff,

I am writing to request that your agency schedule a public hearing on Application # 2-6401-00287/00002 seeking an Article 24 Freshwater Wetlands Permit.

My name is Ericka Naklicki, I am a professional wetland scientist (PWS Number 2938) based out of New Jersey. I have been volunteering with the Coalition for Wetlands and Forests in Graniteville Staten Island and have been researching the Graniteville wetland and upland habitats. It is imperative that the habitat is assessed further for its value to offer a preserved green space for the residents and visitors in Staten Island. This property provides the last remaining open space to an area that is surrounded by development. The wetlands onsite are unique in nature because there are both tidal and freshwater wetlands onsite. There are large trees growing on the property and the upland habitat appears to be a healthy upland forest. The forest provides habitat to a variety of mammal, amphibian and bird species. In addition, the forested habitat provides a buffer for protecting the surrounding community from storm and flooding impacts. The wetlands onsite provide an important resource to the neighboring residences such as:

- Wetlands provide an array of ecosystem services: filter water from runoff, rain, and flooding.
- The sponge like soil holds back pollutants that would otherwise enter the bodies of water nearby.
- Since the Staten Island Expressway, Newark Airport and the chemical treatments plants in Elizabeth NJ, just across the bridge are close, the forest benefits the community by sequestering air pollutants. Graniteville has one of the highest rates of cancer and asthma on the Island.
- The North Shore of Staten Island is an environmental justice community. The communities are majority black and brown and suffer from “multiple, disproportionate environmental health burdens” and “limits to effective participation in decisions” about environmental issues. (EPA)

The applicants propose to disturb the habitat by paving the property for a strip mall and gas station. The property could have a much better use for the community. The site could be used to educate the public about the value of wetland habitats. A public access trail and/or boardwalk could be constructed to allow safe access to the site. The public could identify the trees onsite,

people could occupy the site for birdwatching and other passive recreation activities, and the schools could use the site for outdoor classrooms and education resources. This is one of the last remaining green spaces in the area which could provide the surrounding community with a variety of opportunities to get out and enjoy the benefits of nature in an urban environment. It could bring a community together, help combat obesity by providing a natural area to go for walks and could get people outside to enjoy a nice walk in the woods.

A hearing is needed so that the agency can hear directly from experts and residents who will be impacted by the elimination of a crucial wetland area that buffers the Graniteville neighborhood from storms and provides essential natural habitat.

I am also requesting that the agency require applicants to draft an environmental impact statement (EIS) that addresses the permit that they are now seeking from your Department.

The August 1 Notice refers to a 2017 Department of City Planning Final EIS that your Department cannot rely on for this permit application. The 2017 statement presumed that the wetlands permit that the Department is only now considering granting would be granted. It does not consider at a possible future without the permit. The No Action condition in that EIS assumes that this permit will be granted, because it includes a development that occupies the Adjacent Area of State Regulated Class II E-3 Freshwater Wetlands that is the very subject of this permit application. It is impossible for the Department to use this statement as a basis for comparing what would happen if the wetlands permit is granted with what would happen if it was not, which is the comparison that the State Environmental Quality Review Act requires the EIS to present to the Department for its careful consideration. This statement does not do this at all and is completely inappropriate and inadequate for the wetlands permit application.

The 2017 EIS is inadequate in two additional ways: (1) it was written to describe potential impacts of two specific zoning changes that the developer sought from the City Council and (2) it fails to address potential impacts on an endangered species (the Eastern Mud Turtle, *Kinosternon subrubrum*) that the Department recognizes potentially makes its home in the wetland. As sea levels are rising and storms are getting stronger, this wetland and upland forest can offer the much-needed protection for this surrounding community.

Thank you so much for your attention to this matter.



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