

Rev. Gabriella Velardi-Ward
40 Wolkoff Lane
Staten Island, NY 10303
August 29, 2019

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 Wetland Permit.

I am a resident of the condominium association, City West, which is right across the street from the Graniteville forested wetland aka Graniteville Swamp. I have lived here for 14 years.

I am retired from the NYC Department of Parks and Recreation (DPR) having worked there for 23 years as an architectural designer and construction supervisor / resident engineer. As a designer, I represented the Parks Department to the Mayor's Office of Construction for Sustainable Construction. We formulated City wide policy that required sustainability in public buildings.

I graduated Suma Cum Laude, from Pratt Institute having earned an architectural degree. Along with architectural design I studied ecology and urban planning. I studied with Ron Schiffman a former member of the Department of City Planning and a highly respected urban planner. I have 3 ½ degrees.

I am a survivor of Hurricane Sandy at Midland Beach, where I supervised construction for the NYC DPR. Our project was right next to the boardwalk. I was there the morning of the day that Hurricane Sandy struck. And I was there the day after. Three of our trailers were totally destroyed along with equipment, documents, paperwork and drawings necessary to complete the project.

This Midland Beach project required that many trees be cut down. That area was woefully unprepared for Hurricane Sandy but the disaster was made worse by the loss of the forest. If the forest remained during Sandy, it would have slowed down the fury of the storm surge and there would have been less destruction and perhaps less loss of life.

And, I am the founder and coordinator of the Coalition for Wetlands and Forests (CWF).

I strongly emphasize the need for a public hearing so the agency can hear directly from experts and residents like me and my neighbors who will be impacted by the elimination of a crucial wetland area that has buffered and will continue to buffer the Graniteville neighborhood from climate change. During Sandy, the mobile home park to the west of the wetland, was flooded. Graniteville to the east of the wetland was not flooded. I believe that it was the wetland that saved the residents to the east of the wetland from flooding. To those who say we are not building on a wetland, (*See attached photo: It's a Wetland*) This is the location of the proposed gas station.

Climate change and flooding

What is foremost in my mind are the effects of climate change on Graniteville and Mariner's Harbor and our being left without protective resilience if this project goes through.

I have been preparing for the eventuality of flooding in my slab on grade home. When the floods come, the water will enter my home. My front door is on grade and my home cannot be raised. We know that the sea level is rising. The melting of the poles and of Greenland not only raises the sea levels, it also releases greenhouse gases, CO2 and methane, that were trapped in the ice and under the ice for thousands of years. So, the seas will rise faster as the years progress. *See the NYC Department of City Planning Flood Risk Mapper here:*
<http://dcp.maps.arcgis.com/apps/webappviewer/index.html?id=1c37d271fba14163bbb520517153d6d5>

This is the map for the entire NYC. If you zoom into the NW corner of Staten Island and zoom further into the City West condominium community across South Ave from the Graniteville forested wetland and put in the year **2020**, you will see that we are at risk for **high tide flooding** which will enter this community twice per day. (*See attached Flood Map 2020 and 2100*)

What it's like, now, on the ground. Out of 30 days in April, 21 days have rained. The month of May was the wettest month on record. July was the hottest month on record. This summer we in Graniteville, have had 1 or 2 torrential rain storms **per week**. Some call them rain bombs. It comes ferociously and ends in 10 or 15 minutes. One rain storm came with hail the size of golf balls. All of the water flows to the wetland. I have been filming this.

Torrential rain, another element of climate change, has been happening here in Staten Island as well as elsewhere. Richmond Terrace was flooded so high, from torrential rain, that the water entered a NY City bus and kept coming in. On Jewett Avenue, the flooding was up to the tops of fire hydrants. I have been filming torrential rain in City West, where I live. The stream of water from the torrential rain storm was all flowing toward the wetland. What will happen when there is no wetland to take up as much water from runoff of frequent storms.

If the applicant says the new construction will be able to do that, lets **prove it** by insisting on calculations. We know that one mature tree will absorb 100 gallons of water per day and have it evaporate into the air. That's a lot of water absorbed by 1800 mature trees. How much water will an immature tree absorb per day? **Let's do the math.** *(See attached Graniteville Wetland Habitat benefits, researched and written by wetland scientist Ericka Naklicki) (See also the attached, Ericka Naklicki, Preliminary Wetland investigation)*

Torrential rains rush so quickly down the street that they jump right over whatever catch basins there might be. If it is strong enough, people, children and animals can get caught in it and be carried away. This has not happened yet in Staten Island. We don't know how fast climate change is proceeding. We can't wait till this does happen.

Storm surges are also a feature of climate change. As I stated earlier, I was there in Midland Beach. The storm surge that happened on the south shore was so forceful that it picked up cars, construction dumpsters, boats and demolished homes. The south shore lost its wetlands and forests a long time ago. If we in the environmental justice community of Graniteville, loose our wetlands and forest, will be very vulnerable as they were.

At my construction site in Midland Beach, the contract called for cutting down the majority of trees. When the storm surge came, the electricians trailer had a 10-ton roller, a back hoe and an excavator on top of it. All that was left of the trailer was the tires and a file cabinet. One trailer looked like a can opener took off the roof and the sides. The contractor lost everything. This can happen here.

On the FEMA maps, there are indications of previous flooding events and projected flooding events. Graniteville and surrounding areas are indicated to have had just as much flooding, past and future, as the south shore. But no one is talking about that. Why is that?

Topography

The Coalition for Wetlands and Forests has had a number of community oriented educational forums since we started in 2017. We had a major forum this past July at Snug Harbor. It included videos from 350.org with Bill McKibben and two scientists in attendance who talked about climate change, flooding and managed retreat. Carl Alderson from NOAA showed us a map of Staten Island, where he drew sections through the island, north / south and east / west. He discovered that this whole NW section of Staten Island sloped to the Graniteville Wetland / Graniteville Swamp. The Lisk Ave creek that is now culverted in a pipe under the street, empties out into the Graniteville Wetland. The Willowbrook stream which is now piped under the Regal Walk condominiums empties out into the Graniteville wetland. All of the underground waterways are now sloped to the wetland. *See the video of that talk by Carl Alderson here:* <https://youtu.be/FAS8bWLIHHA>

What happens when there is no more wetland? Will the new immature trees, proposed to be installed, be sufficient to hold the water now being held by the tidal and freshwater wetland together?

It has been said that the bio swales and trees that will be installed will be sufficient to protect the residents of this community. We have the numbers. Again, mature trees take up 100 gallons of water per day and that water is evaporated into the air every day. Let's do the calculations. Let's see if the new immature trees can take the place of 1800 mature trees.

Air pollution

As a coastal community we are not only threatened by this climate change / climate emergency, but we are also threatened by toxic air coming from the nearby S.I. Expressway, by Newark Airport and by the chemical treatment plants that are just across the bridge in Elizabeth NJ. Graniteville just happens to be an environmental justice community; some say an environmental injustice community. We have more than our share of pollutants here. We therefore experience a higher percentage of asthma and cancer. Are we to lose nearly 2,000 trees that currently filter these poisons from the air, the trees and forest of Graniteville?

In addition, if this project goes through, there will be runoff and spills from the gas station and from those over 800 parked cars. These toxins will contaminate the tidal wetland, with the possibility of killing off the plants and animals that call that

home. And it will contaminate Arthur Kill. This project is very detrimental to life in the wetland and in the community surrounding it.

This open green space, the Graniteville forested wetland aka the Graniteville Swamp, is the only open green space we have in this wonderfully diverse community of Graniteville. This is the only space where people can enjoy the benefits of forests and ponds and animals. This is an essential natural habitat for both animals and people alike. *(See attached Graniteville Wetland Habitat benefits, researched and written by wetland scientist Ericka Naklicki) (See also the attached, Ericka Naklicki, Preliminary Wetland investigation)*

Jobs

I am very concerned with the **loss of jobs** if this project goes through. The applicants propose to pave over this open green space for a strip mall, parking lot for well over 800 cars and a gas station. This gas station will undercut the prices of the local gas stations and some will likely go out of business. Small businesses will also likely close down not being able to withstand the competition. *(See attached Fournier, Robson & Associates, LLC. traffic and small business study) (See also the document called Key Challenges of the South Ave Development the BJ's Retail Project – Opposition Testimony Prepared by an Alliance of Small Business Owners in Mariner's Harbor)*

Most of the jobs that will be created if this project goes through, will be temporary construction jobs. The remainder will be non-union, minimum wage jobs. In this age of internet shopping, I wonder how long those jobs will be around.

Economically speaking, studies have shown that small businesses keep their profits circulating in the community many times before leaving the community. Whereas large corporations take their profits out of the community right away, leaving the community poorer.

Sustainability is not Resiliency

Since I represented the NYC Department of Parks and Recreation (NYC DPR) to the Mayor's Office of Construction for Sustainable Construction, and since I have studied it at Pratt, I know quite a lot about sustainability. In addition, I was the Resident Engineer supervising multi-million-dollar LEED projects aka sustainable projects.

Sustainability is a long-range plan to reduce the greenhouse gases, CO2 and methane, for example, solar panels rather than fossil fuel heating, bicycles rather

than carbon-based fuel for cars, white roofs that reflect the sun rather than black roofs that absorb the heat etc.

Resilience on the other hand, is before the disaster strikes protection. Not building in flood plains, moving structures back from the coast, rain gardens for holding excess water, raising homes or buildings, to accommodate flooding, having proper infrastructure, including green infrastructure, i.e., forests, wetlands and oyster beds. Not having old and unreliable sewer treatment plants, which we have on the north shore. This includes forests and wetlands that absorb flood waters, oyster beds that also absorb flood water while keeping the shore line stable.

Solar panels are not resilience. They will not protect anyone from flooding.

I remember talking about climate change back in the 1970s. Those who spoke about it said it won't happen for 50 years. Well, 50 years are up. Climate change is happening now. Let's not be foolish. Let's not cut down the forest, fill in the wetland, watch the destruction of homes and lives and build it back. That's not resilience. That's a waste of money.

NYC approved FEIS

The FEIS approved by the city is very flawed for many reasons. Two large omissions are the fact that the mobile home park was not mentioned. And neither was the fact that this is an environmental justice community. There will certainly be effects on the surrounding communities. It concerns me that our rights as residents of this area, can be given away so easily.

In addition, the NYC approved EIS was to address the requirements of NY City before the City could permit the applicant to perform **only** the actions that were under the jurisdiction of the City, that is, de-mapping the paper streets, rezoning the property and allowing the applicant to take boring samples. The City had no jurisdiction to approve anything else!

I am therefore 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 all a possible future without the permit. The no action condition in that EIS assumes that the permit will

be granted because it includes the 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 the basis for comparing what would happen if the wetlands permit is granted with what would happen if it were 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.

In closing:

Why is it that the south shore can be protected and the north shore, including Graniteville, cannot be protected against climate change? Why is it that no one is talking about this area when they talk about climate change? Why is it that this Environmental Justice community of a majority black and brown people, can lose the only resilience, against flooding, we have in order to go shopping? Why is it that when we think infrastructure, we don't think wetlands and forests? They are very important parts of infrastructure. Why is it that the settlement agreement which was signed only two months before Sandy was not revisited in light of Sandy?

We, the Coalition for Wetlands and Forests, are now members of National organizations one of which is the Anthropocene Alliance whose current initiative is called The United Flooding States of America. We are one of 16 states in this initiative and we will all be lobbying Congress to pay attention to Climate Change and its effects.

What kind of world are we leaving our children and grandchildren? They will have to struggle mightily, especially if we don't slow down climate change. We can say we're safe until we're not and then it's too late

We have had many articles about the issues of the Graniteville Wetland and Forest. Here is one from the Gothamist, recently printed:

<https://gothamist.com/news/vital-staten-island-wetlands-about-get-bjs-wholesale-club>

Letters have been sent to your Department from Eric Goldstein from NRDC, from Congress member Max Rose, from Assembly member Nicole Malliotakis, from the NYC Comptroller, Scott Stringer and from State Senator Diane Savino, among others.

Thank you so much for your attention to this matter.

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