

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.

I am a Commissioner on the Economic Development Commission in Richmond, California. We have a long history working on environmental issues in our area, particularly wetlands in Marina Bay (where I lived for nearly twenty years) and now Point Molate, an eel grass sanctuary also with wetlands.

I understand the applicants propose to pave the area over for a strip mall and gas station. But please, it is imperative to hear from experts regarding the consequences of any development on these precious land parcels. A hearing is needed so that the agency can hear directly from experts and 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 specie (the Eastern Mud Turtle, *Kinosternon subrubrum*) that the Department recognizes potentially makes its home in the wetland.

Thank you so much for your attention to this matter.

Diana Wear
Commissioner, Economic Development Commission
and ally of Point Molate Alliance
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