



# Coalition for Wetlands and Forests

A coalition of environmental groups, civic associations, condominium associations and people who care.

SICWF.org

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DEC Proposed Changes to Threatened and Endangered Species  
Designations for Public Comment, 10/10/2024

Gentlepeople,

Thank you for recognizing the importance of protecting our endangered species. This protection is vital at this time since we are in the 6<sup>th</sup> greatest extinction of species, this one caused by human activities.

Before I continue, I'd like to tell you of my background and experience. I worked, as an architect, for the Capital Projects Division of the NYC Parks Department for 23 years. Part of my work there, as a designer, was to represent the Parks Department to the Mayor's Office of Construction for sustainable construction. We formulated policy that required all public buildings and landscape projects in NYC to include sustainable materials and techniques in design and construction

As a construction supervisor for the Parks Department, I supervised the destruction of a local forest and the construction of a park in Midland Beach SI. The project was right on the beach. I was there before, during and after the 15' storm surge that was Hurricane Sandy. 24+ people were killed on Staten Island alone. I mention these things because the history of destruction of wetland in that location led to the destruction of Midland Beach and the death of 24+ residents in 2012. Before the destruction of the forest, there were pheasants, turkeys and many other types of birds and many types of animals, including deer, that called that forest home. I also mention this because the *extinction of species is intricately linked to the loss of habitat.*

It has been said that in 5 years elephants will be extinct and there will no longer be creatures such as whales and dolphins in the oceans. Looking more locally, the wetlands in Staten Island, especially on the west shore of Staten Island, are being destroyed or will be destroyed in the near future for “development” for profit. The Coalition for Wetlands and Forests (CWF) is now fighting the destruction of 325 acres of wetland, all on the shores of Arthur Kill. If we can’t stop these “developments” for profit, with sea level rise, I predict that the west shore of Staten Island with the endangered species currently living there, will be under water before 2030.

CWF started in 2017 trying to protect the Graniteville Wetland. We fought it for four years. At some point during those years, we realized that the Eastern Mud Turtle, an endangered species, was last seen in the Graniteville Wetland. The developer was given the responsibility to find that which was not in his interest to find, the Eastern Mud Turtle. At that point we had a turtle expert advising us. He scouted the site on June 3rd of that year, found no turtle traps and told us that it was already too late to search for the turtle. He said that they come out of hibernation and scatter in May. The workers for the developer came to the site for the first time the next day, June 4th. They came back for the second time at the end of June. Of course they found no Eastern Mud Turtle. If it was there, it is now destroyed when the forested, vernal pool wetland was destroyed.

We now have the chance to save another species, the Atlantic Coast Leopard Frog which was recently discovered by Dr. Jeremy Feinstein in the area just south of the Old Place Creek, which is just south of the Graniteville Wetland. These 3 Wetlands make up a contiguous eco system. And these three wetlands are right across the street from the Environmental Justice communities of Graniteville. See attached photo.

This wetland system is also adjacent to a mobile home community of elderly, disabled and low-income people. If the area south of and adjacent to Old Place Creek, is destroyed for a commercial development, the mobile home community will be flooded, and the habitat of this newly discovered, endangered Atlantic Coast Leopard Frog will be destroyed. (See photo attached)

I have also attached a photo of a mama and baby horned owl nesting in a tree in the freshwater wetland of Graniteville. I don’t know if they made it out before the trees were cut down. I’ve also attached a list of birds that used this forested

wetland for nesting their young. This also shows the importance of the 6 vernal pools (measured in acres) present in this wetland. It enabled the owls to feed their young on frogs, salamanders and more. (FYI the Graniteville wetland was a freshwater, forested wetland with 6 large vernal pools within 18 acres of wetland lost; Old Place Creek is a brackish tidal wetland and the wetland adjacent to Old Place Creek is a marsh. 12 acres of the tidal wetland are endangered due to construction pollution. The third contiguous wetland is a marsh. The commercial development proposal will destroy 72 acres of wetland with the possibility of destroying an additional 200 acres of wetland.)

This area of marsh adjacent to Old Place Creek is the location of the recently discovered and endangered, new species of frog called the Atlantic Coast Leopard Frog. Of course, if this project goes through it will destroy the habitat as well as the leopard frog.

The bottom line here is that when one breaks the chain of life, there is bound to be trouble down the line, especially in the case of a newly discovered species. When its place in the eco system is not fully understood yet we are courting danger. And when we destroy natural green infrastructure, we destroy the natural protection of communities experiencing climate crisis. If we did not learn that years ago, we certainly cannot deny the effects of the destruction of nature now, with the storms/hurricanes and the great loss of life in North Carolina, Florida and Tennessee. And we do not know what endangered species are not yet discovered as we destroy their habitat.

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