Gentlepeople,
I have copied and pasted my response here as well as attaching it.
Thank you,
Rev. Gabriella Velardi-Ward

Rev. Gabriella Velardi-Ward
40 Wolkoff Lane
Staten Island, New York 10303
March 31, 2023

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Gentlepeople,

Thank you for the opportunity to respond to your most recent proposal to protect New York City from storm surge flooding due to the climate crisis which is getting more destructive each day. This crisis will increase faster than people think with what is going on in Greenland and in Antarctica. The melting ice in Greenland will reach a tipping point in the near future and will not be able to go back the way it was. The permafrost in Greenland is currently exploding methane on land and methane is bubbling up from water bodies. And as you know, methane is a more destructive greenhouse gas than CO2. The ice sheets of Antarctica are breaking off in sheets larger than some US States and melting in warming waters.

With these facts and my experiences in mind, I object to the use of billions of dollars to construct storm surge barriers in the waters of New York and New Jersey. I am glad that the Corp is trying to protect the 520 miles of shoreline in NYC but I urge the US ACOE to prioritize flood protections that are more comprehensive, include natural green infrastructure and that avoid ecological damage. This natural green infrastructure can be achieved much sooner than the estimated 2044 completion date for your proposed project.

The remainder of my letter will explain why I say that, my experiences with the effects of the climate crisis, and why we need protection from those effects now and not in 20 + years. As I stated above, the best and most immediate way to do that is by means of natural green resilience. And we are losing our natural green protection at an alarming rate. We must convince our electeds and other decision makers to stop destroying what wetlands, marshes and forests are left, to restore those that were destroyed and create new natural green infrastructure. Nature can grow back and increase in size. Nature can adapt to changing conditions. Gray infrastructure cannot.

Why I say this:

I would like to tell you of two events in Staten Island that I personally witnessed and experienced. Both involved the destruction of nature-based resiliency and the resultant flooding that occurred after that. The first event happened in October of 2012 with Hurricane Sandy. 24+ people died during that Hurricane. Half the people who died in NYC died on Staten Island, mostly in Midland Beach and surrounding areas.

The second event happened after 1,800 mature trees were cut down and the spongy soil of the vernal pool, forested, freshwater wetland was compacted. Across the street (South Avenue) from the former freshwater wetland is the environmental justice community of Graniteville. 60% to 70% of the residents are of color. A short distance away is a mobile home community of elderly, disabled and low-income people. This short-sighted project has put all of these people in harm's way and from now on. The destruction of the forested wetland happened during the summer of 2021. On September 1st, during Hurricane Ida, Graniteville was flooded. I will get further into the details of these events later in this letter.

My background:

Among my other degrees, I have an Architecture degree from Pratt Institute in Brooklyn, NY. As part of that degree, I studied architectural design, wood, steel and concrete structures, sustainable design, ecology, landscape design (which included water dynamics) and urban planning. After graduating, I spent two years on the Board of Trustees at Pratt. After graduation, I worked for 23 years in the Capital Projects division of the NYC Department of Parks and Recreation as an architectural designer and a construction supervisor. As an architectural designer, I represented the NYC Department of Parks and Recreation to the Mayor's Office of Construction for Sustainable Construction. In that context, I helped formulate

policy, city wide, for large public projects, requiring them to incorporate sustainability in design and construction.

In 2004, Parks, Capital Projects division, gave me the great responsibility of supervising a reconstruction project at Gracie Mansion, the home of the Mayor of NYC. One of my last projects as a construction supervisor, before I retired, was the supervision of a project on the beach in an area called Midland Beach, Staten Island. The designer, a consultant, planned on cutting down most of the trees on the forested area of the beach and creating a mostly hard surface park. At the time of Hurricane Sandy (October 2012) all of the trees, shrubs, understory and ground cover was already destroyed, leaving the community without protection against the ravages of the 15' storm surge that was to happen. I saw people being carried out from their homes in body bags. I was at this site before, during and after Hurricane Sandy which, as I said, killed 24+ people, including children and toddlers. They died in horrible ways.

Stories of how people died:

- The storm hit earlier than expected. It was to hit at 8pm but it hit at 5 pm. A filled dumpster was lifted by the water and landed on a car with 2 people inside the car. They were crushed to death.
- A mother of 2 toddlers was going to stay at home but a friend convinced her to go to the friend's home. She was driving when the storm surge happened. She took her 2 toddlers from the car and ran up a flight of stairs to a stranger's house, asking to be let in. The person who opened the door refused to let her in. She ran back down the stairs and the flood waters pulled the children from her arms and they drowned. It took a few days for the toddlers' bodies to be found.
- A family who lived very close to the water decided not to leave their home since they were looted the year before when they evacuated. Some people called the storm surge during Sandy, a tsunami. It hit this family's home badly. The father went into the basement to try to fix something and was hit in the head by a beam and died. The mother was holding onto her 13-year-old daughter to keep her from being pulled out to the sea. She could not hold her for very long and the daughter was lost. The mother survived and another daughter who was away at college are the only 2 people that are left from that family.

These are only 3 stories of what happened. There are many, many others. I cannot help but think that if the forest was not cut down, it would have buffered the storm surge and perhaps not so many people would have died. This area

faced the ocean and some homes were at the tip of Staten Island. It is debatable whether walls and gates would have kept this area from flooding. The NYC agencies must stop allowing forests and wetlands to be destroyed and buildings to be built so close to the water. In some areas it is 10' to 20' from the ocean. The forest and other natural green infrastructures were needed to buffer the ferocity of that storm.

Sandy changed nothing:

Hurricane Sandy should have changed everything. It changed nothing. The electeds/ decision makers are still giving permits to destroy forests, wetland, marshes and more. NYC is still approving the cutting down of green infrastructure, forests, wetlands, marshes. Buildings and homes are still being built from 10'- 20' feet from bodies of water as well as from the ocean.

It happened again:

My second experience of the destruction of nature-based resilience and subsequent flooding happened in 2021 in Graniteville on the north west corner of Staten Island. When I found out in 2017 about the planned destruction of the 18 acres of forested, freshwater wetland in Graniteville, (formally known as the Graniteville Swamp), a wetland that saved Graniteville during Hurricane Sandy (we were not flooded), to make way for the development of a BJs Wholesale Club, 835 parking spaces, a gas station and two additional buildings, I co-founded the Coalition for Wetlands and Forests to save this wetland and have been leading it since June of 2017.

As a witness to the destruction of Midland Beach during Hurricane Sandy, and as a witness to the suffering of people, I could not allow this to happen again, this time to an environmental justice community where 60% to 70% of the residents are of color and to a mobile home community of elderly, disabled and low-income people.

I had been saying for 4 years that if we lost the freshwater wetland, we would be flooded. This was covered by a local paper. In response, one of our politicians said I was using scare tactics. I was not. The Coalition fought for four years to keep the 18-acre freshwater wetland from being destroyed. During the summer of 2021, the developer had workers cut down the 1,800 mature trees and compact the spongy wetland soil. They started on July 4, 2021. ***On September 1st of 2021, right after the forested wetland was destroyed, Graniteville was flooded for the first time ever with Hurricane Ida,*** a torrential rain storm. The damage was extensive.

Walls and gates would not have kept us from flooding. In fact, walls and gates might have caused additional flooding in those areas around the walls and gates.

Will it happen a third time?

The former Graniteville vernal pool, freshwater, forested wetland was on the north side and adjacent to the tidal wetland, Old Place Creek, which is the only natural resiliency left in Graniteville. Now, a newly proposed project recently introduced to the Graniteville community by NYSDEC, allows construction right next to the south side of Old Place Creek and at the Creek's intersection with Arthur Kill, the body of water between Staten Island and New Jersey. The project will be right next to Arthur Kill. If allowed to be constructed, this project will destroy 70+ acres of marsh/wetland with the possibility of destroying an additional 200 acres. The project is called the Matrix Global Logistics Park West project.

With the climate crises of sea level rise and storm surge, this project will likely be built at a high elevation. This will mean our communities, Graniteville, an EJ community, and our mobile home community of elderly, disabled and low-income people, will be at the bottom of the hill and we, almost certainly, will be flooded again.

Additional comments and questions:

Old Place Creek is Waters of the US (WOTUS) and under the jurisdiction of the Army Corp of Engineers. The representatives of the Matrix Global Logistics Park West project did not seem to know that.

Included in the BJs project is a gas station to be constructed in the former freshwater wetland. It is possible that Old Place Creek could be polluted by the gas station (leaking pipes) as well as by oil leaking parked cars. And with the Matrix project placed on the other side of the Creek, it could be polluted from that side as well.

In addition, with the destruction of the vernal pool (5 pools), freshwater wetland, (with the exception of one vernal pool which is also WOTUS), the salinity of the Creek could be compromised. The Creek is currently brackish. But with the severe cut back of the freshwater from the vernal pools, change of the salinity could be disastrous for the flora and fauna who make the Creek home.

What else is going on right now, in and around Arthur Kill:

As you may know, the **Army Corp has been planning to deepen and make wider Kill van Kull**. Kill van Kull flows into Arthur Kill. This project is to enable increased trade for the ports of New Jersey. Is that being coordinated with your plans?

The Matrix Project, as stated above, will interfere with the Creek emptying out into Artur Kill.

There are **many docks** along the Jersey side of Arthur Kill as well as the Staten Island side.

And, NYC is planning to build a **wind energy farm along and in Arthur Kill**, closer to the southern part of Staten Island. Is that being coordinated with your plans? It seems to me that no one is coordinating all of these projects. I do hope that ACOE, if you go ahead with your latest proposal, will consider these other projects. It is a more than a good idea to consult with community leaders in order to become familiar with what is going on in that area.

This latest Army Corp proposal will not protect everyone from deadly flooding. In addition, it is generally the most vulnerable people, BIPOC communities, people of color communities, low-income people, disabled and elderly people who live in these historically redlined communities that happen to be very close to industrialized shore lines. And managed retreat is not easy under these conditions. Has this new proposal addressed any of these issues? **The response by the ACOE** to the needs of these communities is not sufficient. We need equitable protection now.

Hurricane Ida was a torrential rain storm. This type of flooding will not be addressed by building walls and gates. In fact, walls and gates could create a more dangerous flooding condition. This solution, of unnatural barriers, will only address storm surges. **And storm surge happens once in a while. Sea level rise is constant.** Let us remember that a storm surge happens on top of the sea level rise. Ask the question, is the height of those walls and gates sufficient? The necessary height of the walls and gates will change over time, having to increase as the climate crises increases. And will those walls and gates further endanger tributaries and the land adjoining the tributaries?

Please remember that one mature tree can absorb 100 gallons of water per day and evaporate it. With the destruction of 1,800 mature trees, Graniteville lost the ability of this forested wetland to absorb 180,000 gallons of water per day. That would have gone a long way to absorb flood waters in Graniteville. We all need nature-based solutions and habitat restoration!

In conclusion:

1. The latest version of the ACOE proposal does not protect everyone and all communities. Many, including those living in the most vulnerable areas will be left unprotected.
2. The wall and gate proposal does not protect communities from all forms of climate crisis flooding, only from storm surge flooding. Sea level rise and torrential rain flooding is not addressed. This is a huge amount of money to

spend to only be partially protected. This method only protects against storm surge and that will only be for a short while till sea level rises beyond the height of the wall and gate system. This storm surge-based plan is contrary to the law, The *Water Resources Development Act of 2020 and reiterated in the act of 2022* which required the ACOE study to include sea level rise and stationery/torrential rain storms like Ida, and this plan does not.

3. If water rushes toward the gate from behind, it will cause flooding on the land and in tributaries near to the gate. If water flows from the tributaries to behind the gates when the gates are closed, the water has nowhere to go but to flood the land.
4. The flood projections and the sea level rise projections of the ACOE are out of date. With what is going on in the Antarctic and in Greenland, these projections need to be more current and future oriented.
5. Most people desire natural green infrastructure, we learned how important it is during the Co-Vid pandemic.
6. City agencies have expertise, but so do people in communities. Communities need to be included in these plans, in order to dialogue, show accountability and empowerment, as is stated in the plan.
7. The lack of political will by our electeds is intergenerational injustice because of the severe lack of solutions for future generations. This must be addressed.
8. Air, water, and soil are assets to be protected and passed on to the next generations, not exploited.
9. It will take 14 years to complete the construction anyway. Nature based solutions will give us more immediate protection and should be integrated into the plan from the beginning, not added at the end.
10. If permanent structures are embedded into the water, they will reduce tidal flow, trap contaminants in water that is already overburdened by pollution and degradation. It will also impede fish migration.
11. Any storm surge will be on top of sea level rise so storm surges will be higher than expected.
12 We are currently in the 6th greatest extinction of species. Loss of land-based habitats and now loss of water-based habitats, will harm not only creation but also the human species.
13 **Reject storm surge barriers. Prioritize nature-based solutions**. Walls and gates will take many years to provide protection, ***if*** it is built with ***future*** projections in mind and not for the **present conditions. Build for the future storm not for the last storm.** Nature-based solutions will provide protection now, where and when it is needed.

Thank you for your attention to our voices and experiences.

Sincerely,
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