

Appendix E
Comments Received on the
Draft Environmental Impact Statement

Ref	Transcript	Internal Category	Comment Method	Date	First	Last	Title	Organization / Affiliation	File/Bookmark
001		Organizations	Letter	6/25/2017	Beryl A.	Thurman	Executive Director/President	The North Shore Waterfront Conservancy of Staten Island	NSWC_001
002		Organizations	Email	6/11/2017	Edward	Szczepanski	President	City West Homeowners Association	CWFOA_002
003		Organizations	Email	6/27/2017	Edward	Szczepanski	President	City West Homeowners Association	CWFOA_003
004		Organizations	Email	6/27/2017	Kathy	Romanelli	President	Mariners Harbor Civic Association	MHCA_004
005		Organizations	Letter	6/13/2017				Natural Resources Defense Council	NRDC_005
006		Organizations	Email	7/10/2017	Beryl A.	Thurman	Executive Director/President	The North Shore Waterfront Conservancy of Staten Island	NSWC_006
007		Organizations	Web Form	7/14/2017	Vance	Collins	Vice President	City West Homeowners Association	CWFOA_007
008		Organizations	Web Form	7/14/2017	Anthony	DeFina	Board of Managers	City West Homeowners Association	CWFOA_008
009		General Public	Email	7/17/2017	Danny	Gold			Gold_009
010		Organizations	Web Form	7/16/2017	Arlene	Hasty-Long	Board Member	City West Homeowners Association	CWFOA_010
011		Organizations	Email	7/10/2017	James	Scarcella	President	Natural Resources Protective Association	NRPA_011
012		Organizations	Web Form	7/18/2017	James	Scarcella	President	Natural Resources Protective Association	NRPA_012
013		Organizations	Web Form	7/13/2017	Edward	Szczepanski	President	City West Homeowners Association	CWFOA_013
014		Organizations	Letter	7/14/2017	Clifford	Hagen	President	Protectors of Pine Oak Woods	PPOW_014
015		Organizations	Letter	7/26/2017	Edward	Szczepanski	President	City West Homeowners Association	CWFOA_015
016		Form Letter	Petition	7/26/2017				211 Signatories	Petition_016
017		Organizations	Letter	7/26/2017				Natural Resources Protective Association	NRPA_017
018		Organizations	Letter	7/26/2017	Beryl A.	Thurman	Executive Director/President	The North Shore Waterfront Conservancy of Staten Island	NSWC_018
019		Organizations	Letter	7/14/2017	Clifford	Hagen	President	Protectors of Pine Oak Woods	PPOW_019
020		General Public	Web Form	7/28/2017	Maria	Mancuso			Mancuso_020
021		General Public	Web Form	7/28/2017	Elizabeth	Szczepanski			Szczepanski_021
022		General Public	Web Form	7/20/2017	Danny	Gold			Gold_022
023	7.26.17	Organizations	Public Hearing	7/26/2017	James	Scarcella	President	Natural Resources Protective Association	NRPA_023
024	7.26.17	Organizations	Public Hearing	7/26/2017	Beryl A.	Thurman	Executive Director/President	The North Shore Waterfront Conservancy of Staten Island	NSWC_024
025	7.26.17	Organizations	Public Hearing	7/26/2017	Maria	Brinkmann		Natural Resources Defense Council	NRDC_025
026	7.26.17	Organizations	Public Hearing	7/26/2017	Debbie	Mans	Executive Director	NY/NJ Baykeeper	Baykeeper_026
027	7.26.17	Organizations	Public Hearing	7/26/2017	Edward	Szczepanski	President	City West Homeowners Association	CWFOA_027
028	7.26.17	General Public	Public Hearing	7/26/2017	Robin	Artemus			Artemus_028
029		General Public	Email	8/7/2017	Donald	Recklies			Recklies_029
030		General Public	Letter	8/4/2017	Rev. Gabriella Velardi	Ward			Ward_030
031		Organizations	Letter	8/7/2017	Debbie	Mans	Executive Director	NY/NJ Baykeeper	Baykeeper_031
032		General Public	Email	8/7/2017	Jack	Bolembach			Bolembach_032
033		General Public	Email	8/7/2017	Linda	Cohen			Cohen_033
034		Organizations	Letter	8/7/2017	Maria	Brinkmann	and Eric A. Goldstein	Natural Resources Defense Council	NRDC_034

-----Original Message-----

From: Ed Szczepanski [mailto:epsnyc1@yahoo.com]

Sent: Sunday, June 11, 2017 11:34 AM

To: Deborah Rose <drose@council.nyc.gov>; Len Garcia-Duran (DCP) <LGARCIA@planning.nyc.gov>

Subject: Revised South Avenue Retail Development Issues

By way of introduction, I am the President for the City West Homeowners Association and an active member of the Mariners Harbor Civic Association. At City West, we have 206 families living in our condominium community. The residents of the communities that are against project approval include the Mariners Harbor Civic Association, City West Homeowners Association, Regal Walk Homeowners Association, Southgate, and Graniteville. We are extremely opposed to the proposed South Avenue Retail Development Project affecting the wetlands across South and Forest Avenues and beyond.

It appears that Community Board 1 and the NYC Planning groups are largely moving this project forward without community-wide acceptance or approval. Our locally observed objections in summary are as follows:

- 1) The traffic analysis is flawed, as we do not have the capacity required to handle the proposed peak parking activity of 200-265 cars per hour. Existing traffic delays are being completely ignored and the addition of more car and truck traffic makes it even worse. The community knows the resulting traffic increase will result in major travel delays over what we already experience today.
- 2) Car traffic relating to gasoline fill ups are not included in the peak traffic activity numbers so the worse case traffic patterns are only going to get worst. So the stated peak traffic number is therefore understated by a significant amount.
- 3) Major backups on the Staten Island Expressway take place occasionally and cause highway traffic to be diverted to the local Forest Avenue exit. When this takes place traffic is jam packed and really slowed down. This was not factored into the traffic analysis as well. Lastly, there is no way to expand road capacity to really address these vehicular capacity issues on South and Forest Avenues.
- 4) The continued depletion of the buffering wetlands will cause major increases in flood risk to 1,200 residents and businesses in the community. The cost of flood insurance and the loss of home property values associated with the flood risk are significant financial exposures community wide. The financial exposure may exceed 30 - 50 million dollars. We have not intention of assuming any such financial exposure caused by irresponsible use of the buffering wetlands and poor environmental support from NY State and NY City.
- 5) The marsh and woodlands area by Forest and South Avenues were on the verge of overflow during storm Sandy. This was only a category-one hurricane event. The national weather service is predicting 17 hurricanes for 2017. Category 2 or above hurricanes will result in even more risk without the installation of the South Avenue Retail Development Project. Initially, the project claimed they were using a 10-year storm surge criteria for flood control at the Community Board 1 meeting on May 16th. At that time, we disagreed with the approach and insisted storm Sandy should be the driver. At the following Land Use meeting on June 7th, the flood control criteria were changed to a one hundred year storm surge. we believe the 10-year and 100-year storm surges are not materially different as no changes were made to the project design or water management components between the two meeting presentations.
- 6) Business impacts have already taken place. National Grid was flooded with four (4) feet of water during storm Sandy. This represented a life threatening exposure at National Grid. Likewise Burlington and the NY State DMV and several other businesses were flooded out as well. The removal of more wetland buffer zones around Staten Island will only contribute to worse flooding, increased life and property endangerment.

2) The long term, existing community businesses will be negatively impacted. The gas stations on South and Forest Avenues will be forced out of business as BJ's gas station undercuts prices to gain market share. This means the residents in the community will eventually be forced to deal with BJ's and Costco who can then monopolize the gas supply business space.

3) Communication about such wetland changes by the city and state are clearly inadequate. The project scope and parameters need clear definition and clearly defined community based input and online publication. The present process puts non-informative notices in the Staten Island Advance. Community Board 1 seems to have a problem with proper communication and this is totally unacceptable behavior for a group that is supposed to represent North Shore community interests. Our observation of this process is that the NY state, city, and Community Board 1 is bending over backwards to get this project approved over and above the protests of the community.

4) Wildlife will be driven out into our community on the 28-acre area being developed which is already heavily populated with possums, skunks, raccoons, etc. We do not need any more growth in the wild animal populations in the community as we have too many already. Many of these animals will be at risk to vehicle traffic.

5) The South Avenue Retail Project plans on removing non-native invasive species of trees/plants and replanting of native species. Any place this has been performed before in the community has been unsuccessful, as the non-native invasive trees/plants seem to be more prolific than native plants. That is why the non-native invasive trees/plants dominate in the first place. Parks department follow up and management of the more wild areas is non-existent as they have continuous funding issues.

I would like you to steadfastly oppose the approval of this project. I am also be pursuing this matter with the Staten Island Borough President, James Oddo in a separate letter sent by US mail. The residents in these above mentioned various communities are highly upset and motivated against this project and the poor handling of the matter by NY State, City, and Community Board 1.

Developers that buy land in wetlands take and must accept the financial and development risks changing storms and floods represent especially in light of storm Sandy.

In closing NY City and State need to halt all further wetland development to prevent further depletion of the storm water buffer the wetlands represent. The planning and review process must acknowledge that measuring individual stand alone projects has major flaws, as the cumulative affect of each project as it is implemented is not being considered. This is why we are in this situation right now and will be with every future project.

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> On Jun 27, 2017, at 10:04 AM, Ed Szczepanski <epsnyc1@yahoo.com> wrote:

>

> I am the President of the City West Condominiums Homeowners Association Board of Managers. Our community is directly across the street from South Avenue and we cannot understand why any development is being considered in the wetlands buffer areas surrounding our communities. We have 206 families that will be negatively impacted by the South Avenue Retail Development Project. In addition, Regal Walk is another condominium community right next to ours on South Avenue with approximately 170 families negatively impacted by the project as well.

>

> We are being placed in a dangerous flood risk situation and have considerable financial loss exposures. We have sent project objections via email and letter documenting some of the the community wide issues. The issues do not cover all aspects of the problems identified by other community groups. The correspondence was sent to Council Member Debbie Rose and Borough President James Oddo. I have verbally communicated our concerns to Community Board 1 at the May 16th and the Land Use meeting on June 7th. I sent an email to the Community Board 1 documenting our concerns as well.

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> Secondly, the West Shore Industrial Improvement District has plans affecting the wetlands buffer areas. Key priorities are the development of a plan to expand West Shore BID boundary to include additional properties, convert Gulf Avenue to two-way traffic, and continue Spencer Street improvements.

>

> To compound this matter, the PANYNJ's Port Department is undertaking a long-range Port Master Plan of the Port of New York & New Jersey, and has engaged a team of consultants to support this endeavor. There are too many groups and projects going on in the wetlands areas. These disparate groups need to be brought under centralized community based control, especially on Staten Island.

>

> The impact of eliminating water storage capacity in the wetlands must be tracked and properly managed to safeguard the lives and property of the community from the threat of rain/storm surge flooding. The revised FEMA flood zones must be identified, finalized, and communicated, especially after what transpired with Storm Sandy.

>

> I am formally requesting that the NY State and City politicians put a halt to the South Avenue Retail Development Project but more importantly that a permanent halt be placed on further development projects across all wetlands buffers surrounding Staten Island. The entire planning and development process needs a major overhaul as the lack of meaningful community communications, input collection, and community input insertion in project plans is putting our communities at real life and property risk.

>

>

Submitted by:

Name: **VANCE COLLINS**

Zip: **10303**

I represent:

- **A local community group or organization**

Details for “I Represent”: **VICE-PRESIDENT of the City West Condominiums Homeowners Association Board of Managers**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

The South Avenue Retail Development project makes our traffic problems on South and Forest Avenue worse and exposes us to great flood risk to life and property.

Submitted by:

Name: **Anthony DeFina**

Zip: **10303**

I represent:

- **A local community group or organization**

Details for "I Represent": **City West Condominiums Board of Managers and Resident**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

I have been a Lisk Avenue (off South Avenue) resident for thirty two years and have been on the City West Condo Board of Managers for the past twenty six years. City West consists of 206 family units that border South Avenue. I am alarmed at the prospect of future development in this area - especially given the scope of retail projects already in progress on the South Avenue/Forest Avenue intersection and along Forest Avenue - both areas adjacent to the proposed development project. The forested/marsh area affected by the proposed project serves as an environmental buffer for the area which is subject to flood potential. In addition, the vehicle traffic along this area has increased significantly over the past years - a retail development would complicate the issue further - despite what impact statements claim. There are other suitable building sites in Staten Island that do not impact flood zones and residential communities - a new retail development on the proposed site would negatively impact the area - safeguarding natural areas should be considered as well.

Submitted by:

Name: **Arlene Hasty-Long**

Zip: **10303**

I represent:

- **The local community board**

Details for “I Represent”: **City West Community board member**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project: **Yes**

Additional Comments:

This project will significantly increase traffic on South and Forest Avenues which are currently heavily populated as they are the main conduits to the Goethals bridge. Also located on the surrounding local streets are a charter grade school with a playground attached as well as a center for special needs residents in the area. The influx of traffic and bulk deliveries will disrupt the transport of adolescent students and patients to the center not to mention the increase in traffic incidents. There are any number of locations on the south shore of Staten Island where this project could taken place to avoid overwhelming the North shore with more traffic and disrupting the quality of life which has been the main attraction to Staten Island above the other boroughs. We already have 1 Costco, 1 Target and at a minimum, 6 supermarkets in the immediate area. How many more grocery outlets do we need on the North shore? Also located within a 1/2 mile stretch are Home Depot, Lowe's, Kohl's and Harbor Freight Tools. All big box retailers which has increased traffic in our area and has caused tremendous traffic delays. This project will not only affect the quality of life and property values but will tremendously affect the wildlife and wetlands which there are not much of left due to the recent commercial constructions in our area. We urge you to reconsider.

Submitted by:

Name: **Edward P Szczepanski**

Zip: **10303**

I represent:

- **A local community group or organization**

Details for "I Represent": **The City West Condominiums Homeowners Association as President of the Board of Managers. Our community has 206 residences and are directly across from South Avenue and the South Avenue Retail Development Project.**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project: **Yes**

Additional Comments:

It appears that Community Board 1 and the NY City Planning groups are largely moving this project forward without community-wide acceptance or approval. Our locally observed objections in summary are as follows:
1) The traffic analysis is flawed, as we do not have the capacity required to handle the proposed peak parking activity of 200-265 cars per hour. Existing traffic delays are being completely ignored and the addition of more

car and truck traffic makes it even worse. The community knows the resulting traffic increase will result in major travel delays over what we already experience today. 2) Car traffic relating to gasoline fill ups are not included in the peak traffic activity numbers so the worse case traffic patterns are only going to get worst. So the stated peak traffic number of 200 - 265 cars per hour is therefore understated by a significant amount. 3) Major backups on the Staten Island Expressway take place occasionally and cause highway traffic to be diverted to the local Forest Avenue exit. When this takes place traffic is jam packed and really slowed down. This was not factored into the traffic analysis as well. Lastly, there is no way to expand road capacity to really address these vehicular capacity issues on South and Forest Avenues. 4) The continued depletion of the buffering wetlands will cause major increases in flood risk to 1,200 residents and businesses in the community. The cost of flood insurance and the loss of home property values associated with the flood risk are significant financial exposures community wide. The conservative financial exposure may exceed 30 - 50 million dollars. The residents of the community have no intention of assuming such financial exposure caused by the irresponsible use of the buffering wetlands and poor environmental support from NY State and NY City. 5) The marsh and woodlands area by Forest and South Avenues were on the verge of overflow during storm Sandy. This was only a category-one hurricane event. The National Oceanic and Atmospheric Administration (NOAA) is predicting as many as 17 hurricanes for 2017. The information link is: <http://www.noaa.gov/media-release/above-normal-atlantic-hurricane-season-is-most-likely-year> Category 2 or above hurricanes may result in even more risk without the installation of the South Avenue Retail Development Project. Initially, the South Avenue Retail Development Project claimed they were using a 10-year storm surge criteria for flood control at the Community Board 1 meeting on May 16th. At that time, we disagreed with the approach and stated storm Sandy should be the driver. At the following Land Use NY City Planning meeting on June 7th, the flood control criteria were changed to a one hundred year storm surge criteria. We believe the 10-year and 100-year storm surges are not materially different as no changes were made to the project design or water management components between the two meeting presentations. 6) Business impacts have already taken place during storm Sandy. National Grid was flooded with four (4) feet of water during storm Sandy. This represented a life threatening exposure at National Grid personnel. Likewise Burlington and the NY State DMV and several other businesses were flooded out as well. The removal of more wetland buffer zones around Staten Island will only contribute to worse flooding, increased life and property endangerment. 7) The existing, long term community businesses will be negatively impacted. The gas stations on South and Forest Avenues will be forced out of business as BJ's gas station undercuts prices to gain market share. This means the residents in the community will eventually be forced to deal with BJ's and Costco who can then monopolize the gas supply business space on a good portion of Staten Island. 8) Communication about such wetland changes by NY city and state are clearly inadequate. The project scope and parameters need more effective definition and must start including clearly defined community based input. The present process puts non-informative notices in the Staten Island Advance. Community Board 1 seems to have a problem with understanding the short comings of the present community communication process and this is unacceptable behavior for a group that is supposed to represent North Shore community interests. Our observation of this process is that the NY State, City, and Community Board 1 is bending over backwards to get this project approved over and above the protests of the surrounding community. 9) Wildlife will be driven out into out community on the 28-acre area being developed which is already heavily populated with possums, skunks, and raccoons, etc. We do not need any more growth in the wild animal populations in the community as we have too many already. Many of these animals will be at risk to the increased vehicle traffic the project will entail. 10) The South Avenue Retail Project plans on removing non-native invasive species of trees/plants and replanting of native species. Any place this has been performed before in the community has been unsuccessful, as the non-native invasive trees/plants seem to be more prolific than native plants. That is why the non-native invasive trees/plants dominate the wetlands area in the first place. NY City Parks Department follow up and management of the more wild wetlands areas is non-existent as they have continuous funding issues. 11) The West Shore Business Industrial Improvement District has plans affecting the wetlands buffer areas. Key priorities are the development of a plan to expand West Shore BID boundary to include additional properties, convert Gulf Avenue to two-way traffic, and continue Spencer Street improvements. 12) To compound this matter, the Port Authority of NY/NJ's Port Department is undertaking a long-range Port Master Plan of the Port of New York & New Jersey, and has engaged a team of consultants to

support this endeavor. There are too many groups and projects going on in the north shore of Staten Island wetlands areas. These disparate groups need to be brought under centralized community based control. The impact of eliminating water storage capacity in the wetlands must be tracked and properly managed to safeguard the lives and property of the community from the threat of rain/storm surge flooding. The revised FEMA flood zones must be identified, finalized, and communicated, especially after what transpired with Storm Sandy. The residents in the various communities affected by the project are highly upset and motivated against this project. Developers that buy land in wetland areas take and must accept the financial and development risks changing storms and floods do represent, especially in light of storm Sandy. It is our belief that this proposed shopping area poses too great a threat to the flood plain of the region. Furthermore, it poses too great an impact on the traffic patterns of the vehicular infrastructure. This offers in exchange too small a window of economic growth when the proposed retail businesses contain their payrolls via low wages with poor job growth opportunities. In addition, there exists on Staten Island more than ample retail opportunity for residents to spend their money. We need no more big box retailers especially at the cost of our existing local businesses, major traffic problems, and greatly expanded flood exposures to life and property. In closing, NY City and State need to halt all further wetland development to prevent further depletion of the storm water buffer the wetlands represent. The planning and review process must acknowledge that measuring individual stand alone development projects has major flaws, as the cumulative affect of each project as it is implemented is not being considered. This is why we are in this situation right now and will be with every future project. Previous Next



CITY WEST HOA

City West Condominiums Homeowners Assn
83A Selvin Loop
Staten Island, NY 10303-1783
Tel: (718) 982-6451
Email: epsnyc1@yahoo.com

July 26, 2017

City Planning Commission
22 Reade Street – Spector Hall
New York, New York 10007

To Whom It May Concern,

As President for the City West Condominiums and an active member of the Mariners Harbor Civic Association, we have 206 families living in our community. There are two Condominium communities. City West 1 has 86 homeowners. City West 2 has 120 homeowners.

We are opposed to the proposed South Avenue Retail Development Project and the higher flood risk it represents on our lives and property. We reside just opposite the wetlands across South and Lisk Avenues. In addition, we own and maintain two private streets, Wolkoff Lane and Selvin Loop that intersect South and Lisk Avenues at five different locations.

I have attached 107 signatures on seven (7) pages of City West homeowner petitions demonstrating the widespread nature of our condominium's opposition to the development of the South Avenue Retail Development Project and the wetlands that front South Avenue and adjacent wetland properties in the area.

Our locally observed objections are contained below in summary as follows:

- 1) Presently, our community is located across South Avenue and is not considered to be in a FEMA high-risk flood zone. However, new FEMA flood maps have not been finalized. The expected completion for the FEMA re-mapping process is expected to take 3 to 5 years. A major flood event during this period would result in the financial ruin of our condominiums.
- 2) The continued depletion of the buffering wetlands will eventually cause major increases in flood risk to 1,200 residents and businesses in the community. Should City West Condominiums be placed in a FEMA high-risk flood zone, the financial viability of the community is at risk. The community would be forced to pay for additional individual homeowner flood insurance for possessions located inside each of 206 homes. The condominiums would have to acquire new master flood insurance for seventeen (17) buildings with coverage required in the amount of 20 to 30 million dollars. This expense would be incremental to the almost \$70,000 now paid annually for our non-flood related

property and liability insurance coverage as required by our by-laws. The high insurance costs would place high financial burdens on the community resulting in the potential dissolution of the condominiums. Lastly, the subsequent property value losses could hasten our financial problems.

- 3) The marsh and woodlands area by Forest and South Avenues were on the verge of overflow during storm Sandy. This was only a less than category-one hurricane event. The National Oceanic and Atmospheric Administration (NOAA) is predicting as many as 17 hurricanes for 2017. The information link is:

<http://www.noaa.gov/media-release/above-normal-atlantic-hurricane-season-is-most-likely-year>

Category 2 or above hurricanes will result in even more risk without the installation of the South Avenue Retail Development Project. Initially, the project claimed they were using a 10-year storm surge criteria for flood control at the Community Board 1 meeting on May 16th. At that time, we disagreed with the approach and insisted storm Sandy should be the driver. At the following Land Use meeting on June 7th, the flood control criteria were changed to a one hundred year storm surge without any statistical evidence being offered. The project proposal used the same statistics. We believe the 10-year and 100-year storm surges are not materially different as no changes were made to the project design or water management components between the two meeting presentations.

- 4) The traffic analysis may be flawed, as we already have traffic problems on the Forest and South Avenues today. The traffic peak parking activity was identified as 200-265 cars per hour for the project. Community-wide input identified existing traffic problems and delays are being completely ignored. The addition of more car and truck traffic makes it even worse. Additional issues for discussion are as follows:
 - a. Major backups on the Staten Island Expressway take place occasionally and cause highway traffic to be diverted to the local Forest Avenue exit. When this takes place traffic is jam packed and really slowed down. This may be a critical factor in the traffic analysis. Lastly, there is no way to expand the road capacity to really address vehicular capacity issues on South and Forest Avenues.
 - b. The vehicle traffic study needs be comprehensive and break out all traffic activity not just retail customers. Vehicle traffic relating to gasoline fill ups, truck deliveries, and retail store customer activity needs clear definition. Movie theatre show times will also create addition vehicle entrance and exit traffic activity on Forest Avenue.
 - c. We have endured traffic problems on Lisk Avenue and for years. With increased traffic levels, the traffic and speeding problems taking place as vehicle drivers look to avoid South and Forest Avenue traffic would grow even more so. Our resident's vehicle exits from Wolkoff Lane and Selvin Loop onto South and Lisk Avenues are at risk every day. This proposed project will definitely increase the traffic and related problems in the community.
- 5) Business impacts have already taken place. National Grid was flooded with four (4) feet of water during storm Sandy. This represented a life threatening exposure at National Grid. Likewise Burlington and the NY State DMV and several other businesses were flooded out as well. The

removal of more wetland buffer zones around Staten Island will only contribute to worse flooding, increased life and property endangerment.

- 6) Communication about such wetland changes by the city and state are clearly inadequate. The project scope and parameters need clear definition and clearly defined community based input and online publication. The present process puts brief, non-informative notices in the Staten Island Advance that many agreed no one reads. Community Board 1 is bound by existing processes and this element of communication needs to be made more community friendly.
- 7) Wildlife will be driven out of the 28-acre area that is populated with possums, skunks, and raccoons. Our community will have to provide for even more of these displaced animal populations.
- 8) There are too many groups and projects going on in the north shore of Staten Island wetlands areas. These disparate groups need to be brought under centralized community based control. The impact of eliminating water storage capacity in the wetlands must be tracked and properly managed to safeguard the lives and property of the community from the threat of rain and storm surge flooding.

It is hard to understand the reasoning behind filling in of the wetlands buffers around our community one project at a time. The total losses of water storage capability due to several operating developments have already had an impact on our overall storm surge capacity. Continuing the process without recognizing the actual flood storage loss is certainly unwise.

The city's planning and development process lacks transparency. The antiquated communications, short term notices, inadequate seating for large meetings, and the inability to hear community inputs are present day concerns. The development process needs to involve grass roots community inputs at the onset and to take a hard look at the collective damage being done to the north shore of Staten Island wetlands. A priority needs to be placed on using worst-case flood risk assessments when it comes to resident and property endangerment.

The storm surge water capacity loss needs to be measured for planned projects in all wetlands. We recommend that NY State and City consider a moratorium on further development in the wetlands so a comprehensive resiliency plan can be developed. The safety and financial protection of our residents and existing businesses need to be the priority. Everyone involved in the planning and development process needs to be on the same page with the community.

Sincerely,



Edward P. Szczepanski
City West HOA, President
Mariners Harbor Civic Association Member

<abarnes1@cityhall.nyc.gov>; chagen72 <chagen72@gmail.com>; NRPA2
<NRPA2@aol.com>; argenzv <argenzv@nyassembly.gov>; cb1anjail
<cb1anjail@aol.com>; mcbethj <mcbethj@coned.com>

Sent: Tue, Jun 27, 2017 10:21 am

Subject: Re: Additional Comments for the Draft Environmental Impact Statement (DEIS) for
the South Avenue Retail Development (CEQR No.17DCP030R) (AKA) The Graniteville
Tree Swamp Address: 534 South Avenue, Block 1707/Lots 1 and 5.

The Mariners Harbor Civic Association stands with City West.

We agree that there should be more community input and ask our politicians to take a
closer look!

Thank you,

Kathy Romanelli
President
Mariners Harbor Civic Association
917-805-6322

Sent from my iPhone



**STATEMENT OF THE NATURAL RESOURCES DEFENSE COUNCIL
BEFORE STATE ISLAND COMMUNITY BOARD 1**

Regarding

GRANITEVILLE TREE SWAMP/SOUTH AVENUE RETAIL DEVELOPMENT

June 13, 2017

I am the New York City Environment Director at the Natural Resources Defense Council (“NRDC”), an international not-for-profit legal and scientific organization with over 1.1 million members and activists who have been engaged on a wide range of environmental issues since its founding in 1970. NRDC was incorporated in New York State and has advocated on behalf of environmental, natural resource, and quality-of-life issues in New York City for more than four decades.

I am pleased to be here today, at the invitation of the North Shore Waterfront Conservancy of Staten Island, to offer my organization’s initial thoughts regarding the South Avenue Retail developer’s request for demapping and realigning of streets and for rezoning of parcels in the proposed development site.

In brief, NRDC opposes the proposed mapping and zoning changes at this time and urges the Community Board to defer action until the environmental review process is complete.

We have just received the Draft Environmental Impact Statement for the South Avenue Retail Development, dated June 1, 2017, and have only had a chance to give it a preliminary review. But what we have seen has already raised concerns.

For one thing, we are troubled about the potential impacts of this project on valuable wetlands, including the loss of almost two acres of isolated wetlands and the likelihood that this project would site a gasoline station less than a stone’s throw from the major freshwater wetlands on the project site. At a time of increasing unpredictable weather and for a property this close to the shoreline, such destruction of and threats to wetland parcels raise serious questions.

In addition, we are concerned that the alternatives analysis fails to sufficiently explore reasonable alternatives, including the no-build option. And we believe that the proposed mitigation measures included in the Draft Environmental Impact Statement may not be sufficient



to prevent unnecessary environmental harm to the site's natural resources and to the surrounding community.

For these and other reasons, we ask that you defer action on the proposed mapping and zoning changes and await the completion of the environmental review process before taking final action on the developer's request. Such a deferral would not unreasonably delay the project. And it would give you and other city and state officials the chance to make final decisions on how to proceed after having had the benefit of public engagement in the environmental review process and any changes to the project that might be made along the way. To temporarily defer action tonight, as I have proposed, would be consistent with both the spirit of the city and state environmental review processes and good government planning.

Thank you for the opportunity to present

COMMENTS OF THE NATURAL RESOURCES DEFENSE COUNCIL
CONCERNING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE PROPOSED GRANETVILLE TREE SWAMP DEVELOPMENT PROJECT

Submitted to the New York City Department of City Planning



SLATED FOR DESTRUCTION: A portion of Graniteville Tree Swamp forest and wetlands to be destroyed for relocation of Morrow Street as part of the proposed South Avenue Retail Development Project.

Submitted by
Maria Brinkmann and Eric A. Goldstein

August 7, 2017

The Natural Resources Defense Council (“NRDC”) is a national, non-profit legal and scientific organization that has been active on a wide range of environmental health and natural resources issues since its founding in 1970. For nearly five decades, in addition to its work across the country and around the world, NRDC has had a team of lawyers, scientists and other experts working to safeguard New York City’s environment and the quality of life for its residents in all five boroughs. Among other things, NRDC staff have engaged in numerous matters involving water quality and wetlands protection, resiliency and flooding control, and implementation of state and local environmental review statutes.

We appreciate the opportunity to submit these comments on the Draft Environmental Impact Statement (“DEIS”) for the proposed retail development of a 28.3-acre tract of the Graniteville Tree Swamp in Mariners Harbor, Staten Island -- a project formally titled South Avenue Retail Development. The DEIS was issued, along with a notice of completion, by the Department of City Planning on June 2, 2017. These comments supplement our testimony at the Department’s public hearing on July 26, 2017. We are grateful to the North Shore Waterfront Conservancy of Staten Island for bringing this matter to our attention.

NRDC has significant concerns regarding the environmental impacts of the proposed project. The development would directly destroy 2.35 acres of wetland areas and threaten the remaining 6.94 acres of wetland areas. It would increase flooding risks to vulnerable communities in the vicinity of the project site. And it would adversely impact traffic, air quality, and noise pollution in the Mariners Harbor neighborhood, an EPA designated environmental justice community.¹ Indeed, such concerns were highlighted by the testimony of community stakeholders at the Department’s recent public hearing.

Unfortunately, the DEIS fails to adequately address these issues and thus conflicts with both the spirit and the letter of state and city environmental review statutes. Among other weaknesses, the DEIS fails to comply with the environmental review requirements mandating that a DEIS include a valid No Action analysis and a reasonable Alternatives discussion. It also fails to fully evaluate the impact of the loss of wetlands on flooding in the neighborhood surrounding the project site.

For these and other reasons, we urge the Department to direct the applicant to prepare a Supplemental EIS that incorporates a more complete and up-to-date discussion of these issues, as required by law. We also urge the Commission to deny at this time both the special permit sought by the developer that would allow a retail establishment in excess of 10,000 square feet on the project site, as well as an amendment to the city map that would de-map and re-align portions of several streets that cross the project site. We set forth our concerns in more detail in the sections that follow.

I. The Proposed Retail Development of Graniteville Tree Swamp

The proposed project site is a 28.3 acre parcel of swamp forest in the northeastern quadrant of the Graniteville Tree Swamp in the Mariners Harbor community on Staten Island’s

¹ EPA <https://archive.epa.gov/compliance/environmentaljustice/grants/web/html/ej-showcase.html>

North Shore. The proposed development envisions approximately 226,000 gross square feet of mixed retail uses, including a big box wholesale warehouse, a large-scale supermarket, gasoline station, bank, and office space. Additionally, the plan would pave over green space for the construction of parking lots for 838 cars.

The proposed development would denude one of the most significant remaining swamp and forested land parcels on Staten Island's North Shore. The entire Graniteville Tree Swamp -- which includes the project site and extends beyond it -- totals approximately 45 acres. It consists of 31 acres of upland and swamp forest, 2 acres of open marsh, and 12 acres of salt marsh. The Graniteville Tree Swamp has been recognized as a New York City Land Protection Priority by the Regional Advisory Committee for the New York State Open Space Conservation Plan. It is included on the New York-New Jersey Harbor Estuary Program's Priority List for acquisition, and is designated a "highest priority site." Roughly nine acres of the southwest quadrant of the site have been protected by the N.Y.C. Department of Parks and Recreation, but the remainder, mostly privately owned, is unprotected. In addition to serving as what The Trust for Public Land and the New York City Audubon Society have called "a magnificent remnant of Staten Island primeval," the Graniteville Tree Swamp plays an essential role in protecting the local ecology and neighboring communities from the dangers of flooding. It would be difficult to find a less desirable space for big box sprawl development.

II. The Proposed Development Project Threatens Staten Island's Environment and Increases Flooding Dangers for Local Residents

A. The project would destroy valuable wetlands.

A central concern we have with the proposed development is that it is planned for the greatest tract of swamp forest within the Graniteville Tree Swamp, directly threatening the valuable wetlands that exist there. The project site contains 6.94 acres of jurisdictional wetland areas, including New York State Department of Environmental Conservation ("DEC") and U.S. Army Corps of Engineers ("USACE") mapped freshwater wetlands, as well as mapped DEC tidal wetlands. Additionally, the site boasts 0.39 acres of NYSDEC freshwater wetland adjacent area and 1.96 acres of isolated USACE wetland areas.

Wetlands are valuable natural resources. They serve critical functions such as trapping floodwaters, recharging groundwater supplies, filtering pollution, feeding downstream waters, and providing habitat to fish and wildlife and open space for community residents. The DEIS alleges that the proposed project will preserve and enhance the wetland areas present on the site. But NRDC believes that the proposed project as currently envisioned will result in direct and indirect harm to these exceptionally important areas.

As the DEIS itself admits, the project would directly destroy 2.35 acres of wetlands. In addition, NRDC believes that the project's wetlands plan fails to adequately protect the remaining 6.94 acres of wetlands on the site. The plan asserts that a modestly landscaped buffer area between the giant retail center proposed and the regulated wetland areas is sufficient for preservation. But this approach overlooks the critical loss of wetland protection that will result when the project paves over the 17 acres of mature trees adjacent to the wetlands. Wetlands do

not exist in a vacuum; they function as a system. And leveling 17 acres of towering trees and replacing them with impervious surface will result in certain and significant harm to the wetlands the plan purports to preserve.

B. The project would have a detrimental effect of area flooding.

We are also concerned about a second major consequence of the proposed development -- the likelihood of increased flooding on the surrounding community. Already this area experiences flooding problems from periodic rainstorms. The project -- by threatening to destroy critical on-site wetlands and the adjacent densely wooded forest -- will only exacerbate such problems in the years to come.

Wetlands function as natural sponges that trap and slowly release surface water, rain, snowmelt, and flood waters. Trees, root systems, and other wetland vegetation also mitigate flood conditions. A United States Forest Service study reported that a typical medium-sized tree can intercept as much as 2,380 gallons of rainfall per year.²

Accordingly, the Graniteville Tree Swamp wetlands and forestlands serve a particularly vital purpose in Mariners Harbor. This is a community that was slammed by Hurricane Irene in 2011, and further impacted by Hurricane Sandy just one year later. Vulnerable as it is to future storms, the Mariners Harbor neighborhood cannot afford to lose the natural flood protection that the current land use provides. Preservation of the wetlands and surrounding wetland areas is critical to the resiliency of the Mariners Harbor community.

III. The DEIS Fails to Satisfy SEQRA and CEQR Requirements

NRDC believes that the DEIS for the proposed project is deficient in three ways: (1) it fails to analyze a valid No Action alternative; (2) it fails to analyze a single alternative aside from the invalid No Action plan; and (3) it fails to address the project's detrimental effects on area flooding. We address these issues below.

A. The DEIS fails to analyze the appropriate No Action alternative.

SEQRA and CEQR require a DEIS to analyze a No Action alternative. The No Action alternative discussion "should evaluate the adverse or beneficial site changes that are likely to occur in the reasonably foreseeable future, in the absence of the proposed action." 6 N.Y.C.R.R. § 617.9(b)(5)(v).

The developers apparently believe that in preparing a "No Action" alternative for their proposed project, they can analyze the possible environmental impacts of development not in contrast to current site conditions but in comparison to an out-of-date, as yet un-built development project for the site. For that reason, the DEIS includes a No Action alternative analysis based only upon comparison to a never constructed 2008 site development plan.

² Center for Urban Forest Research, Pacific Southwest Research Station, USDA Forest Service, *Control Stormwater Runoff with Trees* (July 2002), http://northlandnemo.org/images/CUFR_182_UFfactsheet4.pdf.

This approach runs afoul of both the intent of the environmental review statutes and common sense. For one thing, it is unreasonable to expect that the 2008 site plan development is likely to be advanced in the near future. It has been almost a decade since that proposal was developed. If it were the intent of the developers to move ahead with such a plan, they would most likely already have done so. Moreover, new information has become available, including the increased risk of flooding since 2008 to the surrounding community. Accordingly, the no-action assessment should be based upon a comparison of the currently proposed project and the existing state of the parcel slated for development.

Comparison to the 2008 development plan for the No Action alternative is also inappropriate because the 2008 development plan is not “as of right;” it requires discretionary approval from DEC. As the DEIS itself admits, the 2008 plan requires a freshwater wetlands permit, and E.C.L. § 24-0705 gives DEC the discretion whether to grant or deny this permit. (The 2012 stipulation between the developer and the DEC does not change this situation. While it states that DEC will “expeditiously process” a freshwater wetlands application, it does not grant the required permit. Indeed the stipulation states that DEC will issue a permit “unless the SEQRA process or public review raise substantive and significant issues concerning the permissibility of the project.”)

The nine-year-old build-out plan fails to qualify as an “as-of-right” development because it lacks discretionary approval for the freshwater wetlands permit. Indeed, the plan does not meet the applicable statutory requirements for such permit. The project fails two tests outlined in DEC regulations: (1) the project is incompatible with the preservation, protection and conservation of the wetlands and its benefits, and (2) the resulting wetland degradation surpasses the level of “insubstantial.” 6 N.Y.C.R.R. § 663.5(e).³ Accordingly, we believe the wetlands permit should be denied. In any event, since a discretionary permit must still be granted, the 2008 development plan should not be considered as of right, and consequently, it should not be the basis for a No-Action alternative.

The Department should direct the project sponsor to prepare a Supplemental Environmental Impact Statement that looks at an appropriate No Action alternative – one that compares the proposed project to the site’s current land use as a functioning wetlands and forested open space.

B. The DEIS fails to analyze a single Alternative aside from the invalid No Action Plan.

SEQRA requires a DEIS to include a discussion of the range of reasonable alternatives to the proposed action so that the decision-maker may consider whether alternatives exist that would minimize or avoid adverse environmental effects. E.C.L. § 8-0109(4); 6 N.Y.C.R.R. § 617.9(b)(5)(v). This is a cornerstone purpose of the entire environmental review process.

³ It is also worth noting that this agreement was signed on August 23, 2012, two months prior to Hurricane Sandy making landfall on Staten Island’s North Shore, and devastating Mariners Harbor with floodwaters.

The description and evaluation of each alternative should be “at a level of detail sufficient to permit a comparative assessment of the alternatives discussed.” 6 N.Y.C.R.R. § 617.9(b)(5)(v). There is no exact number of alternatives that must be considered in an EIS and courts have held that SEQRA does not mandate that every possible alternative be considered for an EIS to be acceptable. However, as the SEQRA Handbook notes, the alternatives discussion should include alternatives that are “reasonable” and “feasible.”

Despite this directive, the Graniteville Tree Swamp DEIS Alternatives section relies on a single alternative -- the invalid No Action alternative discussed above. The Alternatives discussion in the DEIS reads like a foregone conclusion: the only alternative is another un-built project with many of the same environmental problems as the proposed project. It fails to consider whether the state, the city or a local land trust could acquire some or all of the project’s site. It fails to include any analysis of whether a smaller project that preserved more of the wetlands and forested areas could achieve some of the project sponsors objectives. It fails to examine whether a different configuration of parking, a more small scale commercial development plan and/or a less dramatic destruction of the landscape could achieve many of the developer’s financial goals. The complete absence of an meaningful Alternatives discussion in the DEIS subverts the goals of the environmental review process, and does not aid decision-makers or the public in assessing whether alternatives exist that would minimize or avoid adverse environmental effects of the proposed development.

The Department should direct the project sponsor to prepare a Supplemental DEIS that includes reasonable alternatives that satisfy both the letter and the spirit of New York’s environmental review process as it relates to an assessment of reasonable alternatives.

C. The DEIS fails to analyze the impacts of the loss of 17 ½ acres of forest.

SEQRA requires the DEIS to forecast and assess future environmental impacts of the proposed project “which can be reasonably anticipated.” E.C.L. § 8-0109(2)(b).

The DEIS fails to realistically address the detrimental effects that paving a forest of mature trees will have on area flooding. The Graniteville Tree Swamp is located within the Coastal Zone. Yet the DEIS scarcely references flooding issues and fails entirely to address flooding impacts on the surrounding community -- unacceptable omissions in a 2017 post-Irene, post-Sandy Staten Island.

According to the DEIS, 1,850 mature trees will be cleared to construct the proposed project. These trees serve a critical function in the larger wetland system, helping to slow the speed of flood waters, and in turn lowering flood heights and reducing water’s corrosive force. The DEIS fails to address the realistic effects of the loss of these trees, claiming that the project will plant approximately 2,200 new trees that “would mature in the long-term.” DEIS at § 4-38. Such a comparison glosses over the likely impact of the extensive tree removal aspects of the proposed project.

First, in the foreseeable future, replacing 1,850 mature trees with 1.2 times as many saplings will hardly provide equivalent wetlands value or flood protection safeguards. Second,

even when the replacement trees reach maturity, they are unlikely to attain the towering stature of the current forest. The project sponsors have not provided sufficient detail that would allow DEC to assess whether or not the destruction of wetlands and forest cover is “insubstantial,” as the agency is required to do under the regulatory scheme. Presenting this tree replacement-ratio without more fails to satisfy the requirements of SEQRA.

Additionally, the DEIS makes limited reference to the general issue of flooding in Chapter 2, Land Use, Zoning and Public Policy. DEIS at § 2-13. The City’s Waterfront Revitalization Program (“WRP”) Policy 6 concerns flooding and climate change, and aims to “minimize loss of life, structures, infrastructure, and natural resources caused by flooding and erosion, and increase resilience to future conditions created by climate change.” However, the DEIS responds to this policy by simply addressing how its proposed retail structures would be affected by flooding. The DEIS does not engage in analysis of how the removal of 17.53 acres containing 1,850 mature trees might *contribute* to flooding of the surrounding community. Instead, it summarily concludes that because the building structures would implement flood protection measures, “the proposed project would meet the WRP objective of reducing risks of damage from flooding, and is consistent with this policy.” DEIS at § 2-17. The issue of flooding demands a more serious analysis, especially in view of weather and flooding projections that have changed since the original studies for this site were performed.

The Department should direct the project sponsor to prepare a Supplemental DEIS that includes a thorough evaluation of the project’s impacts on area flooding, taking into consideration the changed conditions and new climate-related weather threats since the original development proposal for this site was conceived and since the 2012 stipulation between the developer and the state was reached.

IV. CONCLUSION

For the reasons discussed above, the DEIS fails to adequately assess the adverse environmental impacts of the Graniteville Tree Swamp Retail Development plan. Additionally, we believe there are substantive and significant questions as to whether the currently proposed project is consistent with state law and rules. Accordingly, we urge the Department to direct the preparation of a Supplementary DEIS so that the project sponsor can provide the Department with necessary information on the likely adverse impacts of the proposed project. We also urge the Commission to withhold issuance of a special permit that would permit a retail establishment on the project site to exceed 10,000 square feet and to withhold any amendments to the City Map involving de-mapping and re-aligning of streets on the proposed development parcel, subject to preparation by the developer of an SEIS that fully addresses the outstanding issues raised in these comments and subject further to a final determination by State DEC as to whether a freshwater wetlands permit will be issued for the proposed project as currently designed.

Thank you for your consideration of these comments.

From: James Scarcella [mailto:nrpa2@aol.com]
Sent: Monday, July 10, 2017 9:04 PM
To: Len Garcia-Duran (DCP) <LGARCIA@planning.nyc.gov>; Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>

Subject: South Avenue Retail 17 DCP 030R and related ULURP, MMR , block 1707, lots 1, 5

Lenny, Robert, hope you are well.

Thank you for the good work DCP accomplishes.

However, some of us copied here have strong objections to the South Ave Retail project. We know the area as the Graniteville wetland Forest.

So we are wondering, why are the comments to the DEIS suddenly accelerated, to 7-18-17 for consideration of the CPC Commishioners?

How is it that a concerned citizen or property owner has to take a day off (Wednesday July 26) from their employment/ salary to testify about the project in Manhattan ? This is contrary to CEQR which states the DEIS hearing shall be ' near the location of the proposed project '.

The Scoping meeting took place at the police station on Richmond Ave , near Forest Ave, they could host the DEIS meeting, or a nearby school.

From a quick glance thru the 500 pages of DEIS , there is plenty to question.

Please consider having the DEIS public hearing on Staten Island. Kindly

acknowledge this EM , and note that because many persons

seeking to comment are traveling or on vacation, we are requesting a comment extension period to September 1, 2017 .

Thank you for your time and consideration of our requests.

Sincerely,

Jim Scarcella , NRPA
718 873 4291

Sent from my iPhone

Submitted by:

Name: **Jim Scarcella**

Zip: **10305**

I represent:

- **A local community group or organization**

Details for "I Represent": **Natural Resources Protective Association**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **Yes**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project: **Yes**

Additional Comments:

Dear Commissioners Please note , there are several inconsistencies in the DEIS. The applicant Coastal Consistency Certification does not have a checkmark next to ' Special Ecological Area' , yet in the DEIS it is truly noted that the parcels are known as ' Graniteville Tree Swamp ' a part of Audubon Society and TPL highly successful ' Harbor Herons ' program, championed by NYC DCP Waterfront & Open Space Division. Note that the project will destroy 1850 trees, habitat to over 100 species of birds. The applicant states the project would promote ' intergration of climate change and sea level rise' in the planning of the project, but building on an acknowledged floodplain is foolish and dangerous. The applicant states there is a need for 'warehouse shopping ' and supermarkets ' a bank and gas station,but Costco is 4 miles away, Pathmark is 2 miles away, and Sunoco is 1/2 mile away. Each tree removes 10 lbs of poison particles from the atmosphere per year , so if the project goes forward, the hardship enduring folks of Mariners Harbor will be dealing with an additional 18,000 lbs of smog , soot and diesel fumes, for the 20 year life of the project. Each tree retains 600 gallons of Stormwater for filtration, so the additional storm water discharge, with its petrochemical poison, will enter the waterways we kakak, fish and Swim in . Please reject the project, and work with us to protect Block 1707, lots 1 and 5 as parkland. Thank you. 4



Natural Resources Protective Association

P.O. Box 060328 Staten Island, NY 10306

Established 1977

To: Honorable Commissioners

Executive Director
Ida Sanoff
CAWD

Director
Assistant Secretary
Tony Rose
Staten Island Sport Divers

Director
Treasurer
Membership
Newsletter

Richard Chan
NRPA

President
Jim Scarcella
NRPA
Friends of Clearwater

Vice President
Charles Perry
Protectors of Pine Oak
Woods

Secretary
Daniel Ingellis
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Assistant Treasurer
John Malizia
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S. I. Tuna Club, FCA

Trustees

Dr. Martin Schreiberman
Brooklyn College AREAC

Dr. John T. Tancredi
Molloy College

Cindy Zipf
Clean Ocean Action

To: Mr. Robert Dobruskin
NYC Planning Dept.
Environmental Review Unit

South Ave Retail
ULURP 160174 ZSR, 150359 MMR 17 DCP 030R

Draft Environmental Impact Statement

To whom it may concern,

We of the Natural Resources Protective Association (NRPA) are opposed to the proposed de-mapping of the City streets for the retail center at 534 South Avenue.

The streets need to remain mapped to facilitate a future park at Block 1707, Lots 1, 5.

Please note, the de-mapping should not go forward, the floodplain needs to be preserved, not developed for an unsustainable retail center. We urge you to work with our elected officials and jurisdictional agencies to buy the parcels from the owner for parkland.

The DEIS submitted by the developer is faulty to say the least. The project is harmful to the community, and must not go forward.

Project need:

Has the applicant truly demonstrated a need for the project? The economic need for the developer to receive rent is there, because they pay their real state taxes. But our economy is now based on Amazon Prime and on-line free delivery, there already are several vacant retail stores on Forest Avenue.

For a Big Box warehouse, Costco is 4 miles away, for a Supermarket, Shop Rite is 3.5 miles away, for a Gas Station, Sunoco is .25 mile away. Also the proposed anchor store, BJ's Wholesale, is 5 miles away in NJ with cheaper fuel.

Because the CPC truly does shape the city, shouldn't the CPC request more information on 'project need'? Also, please note, the NRPA picked up trash and debris where the applicant and DOS failed to maintain the cleanliness of the parcels. The Applicant was contacted about purchase for conservation purposes, but failed to return phone calls.

Natural Resources:

The site is known as the Graniteville Swamp or the Graniteville Tree Forest wetlands. It's an integral part of Audubon Society 'Harbor Herons' program, but the applicant failed to note this in their 'Coastal Consistency Application'. As outlined in the DEIS, there is a tremendous inventory of mature trees, there are salamanders, garter snakes, ground squirrel and much more. The DEC has mapped the wetlands under duress, because there are still wetlands at the site that are not mapped. Further this destruction of 1850 (one thousand eighteen hundred fifty) mature trees directly contradicts One Million trees and Plan NYC 2030, to revive our collective health and sustainability, making NYC more ~~vulnerable~~ **VULNERABLE** to climate change and its destructive effects.

Water and Sewer Infrastructure:

The project will require significant destroying of mature trees, each Tree removes 5 pounds of poison particles from the atmosphere per year. For the 20 year life of the project, 1850 trees times 5 lbs. times 20 years means the kids of the North Shore of SI get an extra 18,500 pounds of poison particulate to deal with, on top of other stressors. Each tree can absorb 600 gallons of storm water per year. The 108,000 gallons would now be free to cross Forest Ave and South Avenue. This would now flood Regal Walk and surrounding homes and businesses.

The 2014 CEQR is faulty when it states that 1.2 inches of rain takes 11.5 hours to fall, in the past year, there have been 10 events which the rain fell at 1 inch per hour, with poor results for communities.

Further, a discharge of unfiltered storm water pollutants into Old Place Creek or Goethals Bridge Pond is not good, we (the public) are kayaking, swimming and fishing in these waters

The Port Richmond WTCP discharges sewage into the Kill van Kull on a regular basis (each rainfall greater than .5 inches causes Combined Sewer Overflow) adding 57,000 GPD of sewage when the rain is .5 inch or greater to the Kill van Kull is not recommended, but the project will do just that if its approved.

Transportation:

The applicant states that additional traffic can be mitigated with relocation of 'North' Morrow Street, but the proposed relocation of the Street would destroy a pond that was created from the creation of the movie theater in the late 1970's. This would mean previous DEC mandate can be ignored, provided a revised, inferior wetlands mitigation is proposed. A bad precedent. The traffic 'study' consisted of counting vehicles for one hour at Forest Ave., South Ave and a couple of other locations.

The DEIS states that 1 person off-peak, 6 people at peak weekdays and then 10 persons peak weekends would use mass transit to access the site, below the threshold for CEQR required surface transportation route/schedule adjustments. The DEIS speaks of the 'project need' but the applicant determined no public transportation adjustments are required.

The mapped bed of Wemple Street runs through the parking lot of several businesses on Forest Avenue, have these businesses and not for profits been contacted for relocation by the applicant?

This parcels are priority acquisition site of the Harbor Estuary Program. for its unique

habitat of wetlands adjacent to upland forest and supports over a hundred species of birds, so we are not talking about a minor habitat and wildlife issue.

The floodplain risks to the nearby homes and businesses will increase tenfold and all can expect an increase in their insurance premium because the project will fill in a floodplain.

We urge all parties to put aside this destructive project of planned obsolescence and work together to pay the applicant for the value of the parcels, plus legitimate expenses. We are willing to help with preservation of these parcels.

Thank you.

Sincerely,

NRPA Board of Directors:

Ida Sanoff
Anthony Rose
Richard Chan
Daniel Ingellis
Charles Perry
Jim Scarcella
John Malizia

CC:

Governor Andrew Cuomo
Mayor Bill de Blasio
BP James Oddo
Councilmember Debbie Rose
CB 1
Media
NY 1 News

Visit us on the Internet at WWW.NRPA.COM



Department of
Environmental
Conservation

Today's Air Quality Index (AQI) Forecast for New York State

New York State Air Quality Hotline: (800) 535-1345

If you would like to be notified when daily air quality reaches a level of your choice, you can sign up for Enviroflash at enviroflash.info.

Yesterday's Observed :: **Today's Forecast** :: Extended Forecast :: AQI Information
Complete set of forecast values

For Monday, June 12, 2017 (Updated 06/12/2017 @ 9:46AM)

Air Quality Health Advisories in Effect For Long Island, NYC Metro, Eastern Lake Ontario, Central, and Western Regions.

Region	Maximum AQI	Air Quality
Long Island	120 (Ozone)	Unhealthy for Sensitive Groups
NYC Metro	110 (Ozone)	<u>Unhealthy for Sensitive Groups</u>
Lower Hudson Valley	79 (Ozone)	Moderate
Upper Hudson Valley	92 (Ozone)	Moderate
Adirondacks	76 (Ozone)	Moderate
Eastern Lake Ontario	101 (Ozone)	Unhealthy for Sensitive Groups
Central	101 (Ozone)	Unhealthy for Sensitive Groups
Western	101 (Ozone)	Unhealthy for Sensitive Groups



AQI Legend

From: "New York State Department of Environmental Conservation"
<nysdec@public.govdelivery.com>
Date: June 13, 2017 at 8:04:28 AM EDT
To: nrpa2@aol.com
Subject: Air Quality Health Advisory for Tuesday, June 13, 2017
Reply-To: nysdec@public.govdelivery.com



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An Air Quality Advisory has been issued for **Tuesday, June 13, 2017** for the following regions:

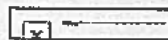
- **NYC Metro**
- **Long Island**

This advisory is effective **10AM to 10PM**. The pollutant of concern is **Ozone**.

To see the daily Air Quality Index (AQI) forecast for New York State, visit our website. You may also call the NYS Air Quality Hotline at **1-800-535-1345**.

The New York State Department of Environmental Conservation respects your right to privacy and welcomes your feedback. | [Update preferences or unsubscribe](#). | [Learn more about DEC Delivers](#).

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Andrew M. Cuomo, Governor * Basil Seggos, Acting Commissioner

This email was sent to nrpa2@aol.com using GovDelivery Communications Cloud on behalf of: New York State Department of Environmental Conservation
625 Broadway Albany NY 12233 (518) 402-8013

From: "New York State Department of Environmental Conservation"
<nysdec@public.govdelivery.com>
Date: July 19, 2017 at 1:51:21 PM EDT
To: nrpa2@aol.com
Subject: Air Quality Health Advisory for Thursday, July 20, 2017
Reply-To: nysdec@public.govdelivery.com



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An Air Quality Advisory has been issued for **Thursday, July 20, 2017** for the following regions:

- **New York City Metro**
- **Long Island**

This advisory is effective **11AM to 11PM**. The pollutant of concern is **Ozone**.

To see the daily Air Quality Index (AQI) forecast for New York State, visit our website. You may also call the NYS Air Quality Hotline at **1-800-535-1345**.

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Andrew M. Cuomo, Governor * Basil Seggos, Acting Commissioner

This email was sent to nrpa2@aol.com using GovDelivery Communications Cloud on behalf of New York State Department of Environmental Conservation
625 Broadway - Albany, NY 12233 (518) 402-9013

Summer heat can lead to the formation of ground level ozone a major component of photochemical smog. Automobile exhaust and out-of-state emission sources are the primary sources of ground level ozone and are the most serious air pollution problems in the northeast. This surface pollutant should not be confused with the protective layer of ozone in the upper atmosphere.

People, especially young children, those who exercise outdoors, those involved in vigorous outdoor work and those who have respiratory disease (such as asthma) should consider limiting strenuous outdoor physical activity when ozone levels are the highest (generally afternoon to early evening). When outdoor levels of ozone are elevated, going indoors will usually reduce your exposure. Individuals experiencing symptoms such as shortness of breath, chest pain or coughing should consider consulting their doctor.

Ozone levels generally decrease at night and can be minimized during daylight hours by curtailment of automobile travel and the use of public transportation where available.

New Yorkers also are urged to take the following energy saving and pollution-reducing steps:

- use mass transit or carpool instead of driving, as automobile emissions account for about 60 percent of pollution in our cities;
- conserve fuel and reduce exhaust emissions by combining necessary motor vehicle trips;
- turn off all lights and electrical appliances in unoccupied areas;
- use fans to circulate air. If air conditioning is necessary, set thermostats at 78 degrees;
- close the blinds and shades to limit heat build-up and to preserve cooled air;
- limit use of household appliances. If necessary, run the appliances at off-peak (after 7 p.m.) hours. These would include dishwashers, dryers, pool pumps and water heaters;
- set refrigerators and freezers at more efficient temperatures;
- purchase and install energy efficient lighting and appliances with the Energy Star label; and
- reduce or eliminate outdoor burning and attempt to minimize indoor sources of PM 2.5 such as smoking.

A toll free Air Quality Hotline (1-800-535-1345) has been established by DEC to keep New Yorkers informed of the latest Air Quality situation. Further information on ozone and PM 2.5 is available on DEC's website at and on the DOH website. (link leaves DEC's website)

Today's Air Quality Health Advisory regions consist of the following: **Region 1 Long Island**, which includes Suffolk and Nassau counties; **Region 2 New York City Metro**, which includes New York City, Westchester and Rockland counties; **Region 3 Lower Hudson**, which includes Sullivan, Ulster, Dutchess, Orange and Putnam counties.

<http://www.dec.ny.gov/press/press.html>

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Andrew M. Cuomo, Governor * Basil Seggos, Commissioner

ASK CLAY

Owls aren't the only night birds



Clay Wollney *For Staten Island Advance*

Owls have a reputation for their nocturnal activity, but they don't have a monopoly on nighttime crooning. Other birds such as nighthawks and whippoorwills also call at night. Yet others that are truly diurnal awaken early enough to begin calling an hour or two before sunrise.

While the sound of birds singing during the day is a familiar phenomenon, the calls of birds at night is sometimes a bit disconcerting. Over the years I've noticed that one species in particular attracts people's attention due to its nocturnal vocalizations. This is the northern mockingbird. Since it is well known for the variety of calls it makes in rapid sequence, identifying these birds by call alone is easy. Their predilection for the habitat we create with lawns and shrubbery makes the mockingbird one of the most obvious nighttime noisemakers.

Some of the people I've spoken with have been impressed by the mockingbird's nightlong songs, one even described the birds singing admiringly as "a beautiful repertoire of songs." More often it is described in less flattering terms especially if the listener has been kept awake by the bird's seemingly unceasing capacity for making noise.

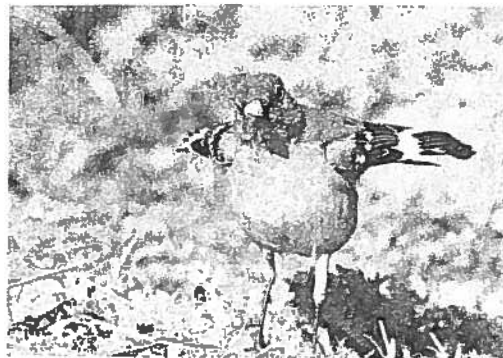
Like almost all of its feathered relatives, the mockingbird calls to attract a mate. What makes the mockingbird different from most other birds is the amount of time they spend in the search for a mate and defense of their territory. Their singing begins in early spring before most other birds and often lasts well into October when other species have long since quieted down. Not only do they have an extended breeding season, mockingbirds are likely to sing at almost any time of the day or night.

Any mockingbird heard calling its song over and over is surely a male that is looking for a mate while defending his piece of property from other males. Part of the reason they are heard so often is that mockingbirds often raise three or more broods each year. It's the bachelors that are more of a problem, however.

The unpaired males are the main offenders when it comes to incessant singing. Hope springs eternal in the hearts of these amorous birds so the bachelors do everything they can to defend the territory they need to attract a mate no matter the time of day or night. Much of their night calls are simply males responding to other males in defense of their respective territories. They even continue their singing well into the autumn in hopes of procuring a mate for the following spring.

WHIP-POOR-WILLS ONLY HEARD AT NIGHT

The eastern whip-poor-will and Chuck-will's-widow are two other bird species that are exclusively active at night. Their odd names are reflections of their mating calls that



The mockingbird is a frequent nighttime caller, though usually thought of as a daytime bird.

can be heard well after the sun has set.

These birds have a cryptically mottled pattern of gray and brown that camouflages them so well in the leaf litter of the forest floor that they are nearly invisible when in plain sight. This serves them well since they sleep all day.

NIGHTHAWKS HUNT AT DAWN AND DUSK

Another nocturnal avian that visits the island is the common nighthawk. It isn't a true hawk or any other sort of hawk at all, though it does resemble one in a few ways. Insects are the major part of a nighthawk's diet, which is the reason that they are most active at dawn and dusk when the most insects are flying about.

Though they have smaller bodies and beaks than real hawks, their swooping flight seen as the sun goes down may seem a bit hawk-like though in slower motion.

Like the whip-poor-will, these birds are well camouflaged with a mottled pattern to keep them hidden during the day when they are resting.

NIGHT HERONS MAKE WEIRD SOUNDS

Both the black-crowned and yellow-crowned night herons occur here on the Island, but you have to live near wetlands to hear them call. These are relatively short, squat birds that hunt along the shorelines on ponds and estuaries in the evening and night.

Their sharp and guttural squawks and cackles are among the most unusual calls of our local birds and will surely disturb your sleep if you are within hearing range during their breeding season.

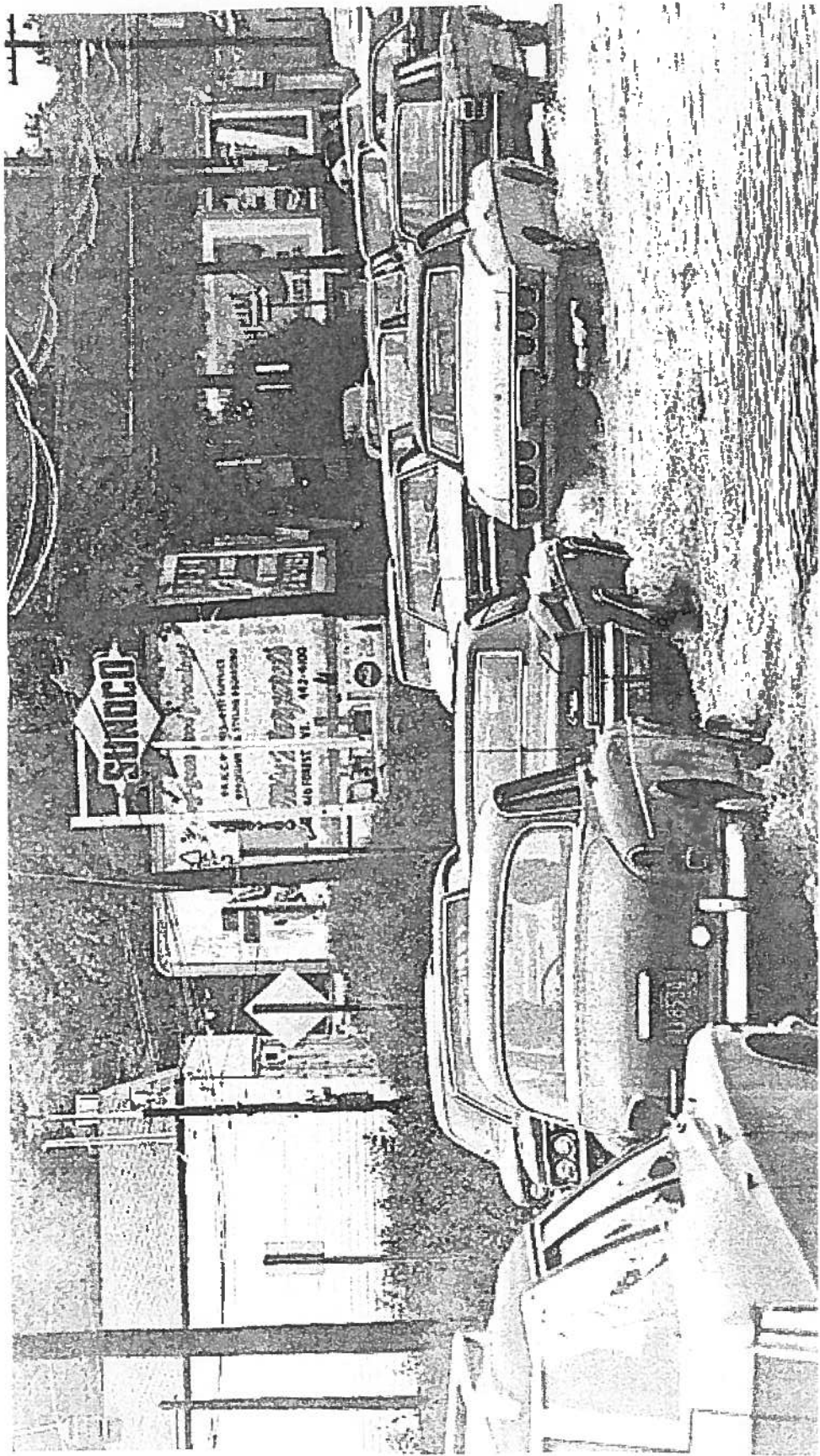
MANY SONGBIRDS ARE LIGHT SLEEPERS

Besides the species that are committed to a nocturnal lifestyle, many common bird may be heard at any given time of the night. Robins, swamp sparrows and cardinals are just a few of the songbirds that may be heard in the wee hours of the morning.

Have a question for Clay? Email cwollney@statenilandacademy.org.

64 SUNDAY, NOVEMBER 27, 2016 STATEN ISLAND ADVANCE SILIVE.COM

Memories



OAKWOOD BEACH CLEANUP*By Jim Scarcella*

In autumn, NRPA returned to Oakwood Beach, at the bottom of



Tarleton Avenue. The area is parkland, with ownership split between the Parks Dept. and the NYC Dept. of Environmental Protection.

Many homes in the floodplain were bought by NY State and the area is undergoing a 'return to nature'. The beach is beautiful, stretched between Cedar Grove and the northern portion of the Gateway National Recreation Area.

Some fishermen use what's left of the outfall jetty for recreation, but unfortunately there is a lot of illegal dumping here.

There is a break in the guardrail to go over the 30' wide, 15' high sand berm. We used this path to access the beach.

The floatable debris was varied and plentiful. There were cigarette butts, potables packaging, cellophane, tampon applicators, snack packaging, straws, single use plastic bags, plastic bottles and balloons.

The boating/fishing world was represented by a portable boat toilet, a non-slip outdoor shower mat, ropes and a six tray oyster gardening presentation, with square rope and hoisting assembly. Esther and her team found toys, quart oil containers, a yellow rumped warbler's feather and a mushroom growing out of the sand. Christopher found a truck tire on the beach, fortunately there was no steel rim. We removed a few shovels of sand and Tony Rose and Mike helped Chris roll the tire about 250' down the beach, then up the 15 foot berm and down the path to the guard rail.

We found sponge piling buffer, a freezer door, a refrigerator insulated side panel, Styrofoam and a traffic cone with the top panel severed off. The sports world contributed a golf ball, a tennis ball and a deflated football.

There was a considerable storm the previous evening, and Tony found a large hermit crab that got stranded when the large whelk shell he was residing in (carried) was thrown too far up the sand.

The natural world was further represented by killdeer, a shorebird that has its nest up the berm and then uses alternative calling from different strategic locations to confuse predators.

Thanks to Richie, Rob, Grace, Tony, Ester, Mike, Howie, Chris, Dominic and all who participated.

All memberships expire on December 31, so please renew NOW!

CONFERENCE HOUSE/PAGE AVE BEACH CLEANUP

By Jim Scarcella

In early October, under cloudy skies, NRPA cleaned the beach at the site of the Living Breakwaters/Governor's Office of Storm Recovery, Page Avenue beach in Tottenville. The site is to become part of the Billion Oysters Project, which will remove pollutants from the water, dissipate wave energy and make the surrounding area less susceptible to flooding.

Earlier this autumn, there were Bald Eagles living nearby.



A local Boy Scout troop has connected the trails from Conference House to Mt. Loretto State Park.

The beach is interrupted by a few storm water discharge jetties.

Page Avenue traverses the southernmost portion of Staten Island and in fact, southernmost New York State. The beach has fantastic views of Lower NY Bay, Raritan Bay and Bayshore New Jersey. The geologic composition is glacial moraine, the Wisconsin glacier deposited significant rocks and minerals.

For the cleanup, we had folks move up the beach to the Mt. Loretto property and south to Surf Avenue. There were several recreational hotels there at the turn of the century, where guests went sailing, shell fishing and dined on the freshest seafood.

The cleanup yielded cigarette butts, tampon applicators, plastic bottle caps, snack packaging, beer bottles, Styrofoam packing materials, a life jacket, men's sweatpants, an 'Echo' hooded sweatshirt, dock pieces, rope, a striped bass hook and float, Starbucks and Dunkin' Donuts cups, plastic sheeting, bed sheets, a pillow, balloons, soda cans, a rusted auto oil filter, a windshield wiper housing from a 1950's automobile, juice packaging, a baby car seat, carted luggage, an umbrella and much more.

The birding was varied, everything from a Great Blue Heron to a Seaside Sparrow. The insect life yielded praying mantis, crickets and a single Monarch Butterfly feasting on seaside goldenrod nectar.

Overall we removed over 300 lbs. of debris and recycled an additional 6 lbs. of glass and metal.

Special thanks to Danny, Rich, John, Chuck, Leslie, Mike, Nick and all who helped.

(continued next page)

Resiliency Institute of Jamaica Bay be pushing to fill in Jamaica Bay's borrow pits, especially Grassy Bay? Was the sudden resurrection of The Thing That Refuses to Die just a coincidence, or is something else going on that prompted this? A few days after the Jamaica Bay Task Force meeting, there was an op-ed in Crain's New York Business that supported expanding area airports, including extending JFK's runways further into Grassy Bay. The op-ed piece also referred to a study put out by the Regional Plan Association a few years ago that also mentioned extending the runways into Grassy Bay.

We are very, very concerned about this. Jamaica Bay is a very special place, but it is also quite fragile. Some of the stakeholder groups involved with the Institute told them that filling these pits for any reason was a really bad idea. NRPA will not hesitate to join with and support the stakeholders.

We will be monitoring this situation closely and keeping everyone informed about further developments.

GOTHAM WHALE

By Paul L. Sieswerda

A team of scientists from Gotham Whale, Staten Island's first marine mammal research organization, is



Humpback lunge feeding through a "bait ball".
Credit: Dennis Guiney/ Gotham Whale

conducting an experiment to determine the role of sound in the feeding behavior of humpback whales. Humpbacks have been returning to NYC waters to feed on menhaden, locally known as bunker. How do they locate the "bait balls" in waters too murky to see more than 3 meters? They don't appear to use their noses, and they do not echolocate like toothed whales and dolphins.

Gotham Whale believes they hear a sound produced by the fish.

Studies on herring, a closely related species, show that they will emit bubbles when under attack by predators. Dr. Ed Gerstein, of Florida Atlantic University will record the "bait balls" to determine if a sound is produced that the whales could hear. Gotham Whale is crowdfunding to bring Dr. Gerstein and his acoustic equipment to NYC and charter a boat to conduct this experiment. While playing on the whimsy of "fish flatulence", the results will be critical to analyze the importance of this acoustic clue in an environment that is getting noisier and noisier as the ships get bigger and bigger in the busiest port on the eastern seaboard.

AMAZON SMILE

By Richie Chan

Do you shop on Amazon? How about signing up for Amazon Smile?

There is no cost to you and all purchases under Amazon Smile can qualify for a 0.5% donation of your purchase to the Natural Resources Protective Association.

Each time you sign in, log into <https://smile.amazon.com/>, check to see if Natural Resources Protective Association is selected then start shopping. It's a great way to help us out at no cost to you, so thank you in advance!

LEMON CREEK PARK CLEANUP

By Jim Scarcella

In late September, NRPA and the Protectors of Pine Oak Woods, teamed up to clean the Sharrot Avenue (Dorothy Fitzpatrick) fishing pier beach at Princes Bay. Ms. Fitzpatrick was head of Community Board 3 and along with the late



Lorraine Sorge, fought for common sense in our planning process.

The beach is on the southern portion of Lemon Creek Park.

There were several people casting for snapper (young) bluefish. Also someone had vandalized the water fountain to make the water run continuously, like a fish cleaning station.

At first glance, there didn't appear to be much garbage, but looks can be deceiving.

There was a garbage bag on the beach, partially opened. I took the contents and re-bagged them, caps, applicators, cigarette butts and packaging, coffee cups, bait packaging, and more.

There was more debris upland, including more cigarette butts and straws, single use plastic bags, tampons and fishing line.

The refreshment containers were varied and numerous, we gathered about 60 cans and bottles for recycling.

There was a hidden cove, that had been created from driftwood and rocks that was amazing.

Additional debris included two tires, a large Styrofoam dock float, a plastic basketball stand, a large piece of shed flooring, shoes, sneakers, a shirt, snapper popper fishing rigs, Shimano tackle case, a sweater, a used heparin injection device and glassine drug envelopes.

The intertidal creek at the Mt. Loretto property that feeds the pond had a multitude of banded killifish swimming around. We heard and saw several terns trying to hone in on silversides and peanut bunker.

Special thanks to Chuck Perry and Richie Chan, Elaine Croteu, Dominic Durso, Howie, Mike, Heather and every one for organizing and executing the cleanup project.

Join NRPA today
See page 5

signed on the basis of computer models and if your models are based on the wrong information, the project will not be designed correctly. The results may be catastrophic and may include problems such as oxygen deprivation killing off fish and improperly designed flood control measures that erode beaches and wetlands instead of protecting them.

We always tell people to read Environmental Impact Statements very, very carefully and what was buried in this document was a real shocker. To make a long story short, the EIS appears to be based on old information about the length of time

needed for water to circulate through Jamaica Bay. Years ago, it was thought that water moved so slowly in there that it took over a month for the Bay to "flush". But extensive research showed that the water was moving so quickly that only a week was needed.

Not only did NRPA bring this to the attention of the Army Corps, but one of the authors of the updated research, Dr. John Tanacredi, came to the hearing. Dr. Tanacredi, Director of the Center for Environmental Research and Coastal Oceans Monitoring at Molloy College, has served as one of NRPA's Trustees for many

years. He is a noted researcher who also headed the National Parks Service's Jamaica Bay Unit for many years. Dr. Tanacredi vociferously objected to the modeling that was used in the report and for the safety of all, we hope that these inaccuracies will be corrected.

NRPA has submitted comments on this project and we have also asked for a supplementary EIS on the Coney Island tie-in. We will review these studies when they are released and report back to you.

Upcoming Events:

- **Sunday, January 1, 2017** 27th Annual New Year's Day Beach Walk. Meet at Gateway Great Kills 12 PM to 2 PM. Join us for a fantastic way to have a winter fresh air and beach discovery. Snacks and refreshments provided. Jim 718 873 4291 or Cliff 718-3138591
- **Tuesday, January 3, 2017** NRPA monthly meeting at the Nature Center in Blue Heron Park at 7:30 PM
- **Tuesday, February 7, 2017** NRPA monthly meeting at the Nature Center in Blue Heron Park at 7:30 PM
- **Tuesday, March 7, 2017** NRPA monthly meeting at the Nature Center in Blue Heron Park at 7:30 PM
- **Tuesday, April 4, 2017** "40 Years of Blue" Join NRPA as we celebrate forty years of protecting our Marine Environment, from Lou Figurelli, to Kerry Sullivan, from the Mud Dump to Fresh Kills, from sewage treatment to Bluebelts, from Shell fishing to sand mining. NRPA has been and will continue to be the voice for our estuary and wildlife, water quality. Please support us on this fantastic milestone as we celebrate at Staaten Restaurant

Dedicated to preserving the marine environment, the Natural Resources Protective Association is a 501 (c) (3) non-profit organization. All contributions are tax deductible.

All memberships expire on December 31, so please renew NOW!

(All memberships paid after October 1 credited to the following year)

Are You A Member? Have You Renewed? Please Join Us NOW!

\$15.00 Individual

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\$25.00 Organization

\$100.00 Sponsor (after 5 payments you become Lifetime member)

\$500.00 Lifetime Member

YES! I/We want to join the fight!

Name: _____

Address: _____

Phone: _____

Email: _____

Mail to: Natural Resources Protective Association
 C/O Richard Chan, Treasurer
 Post Office Box 050328
 Staten Island, NY 10305











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The North Shore Waterfront Conservancy of Staten Island, Inc.

P.O. Box 140502

Staten Island, New York 10314

June 25, 2017

Mr. Robert Dobruskin, ACIP, Director
Environmental Assessment & Review Division
New York City Department of City Planning
120 Broadway, 31st Floor
New York, New York. 10271

Reference: Additional Comments for the Draft Environmental Impact Statement (DEIS) for the South Avenue Retail Development (CEQR No.17DCP030R) (AKA) The Graniteville Tree Swamp

Address: 534 South Avenue, Block 1707/Lots 1 and 5.

Dear Director Dobruskin:

In reviewing the South Avenue Retail Development's Draft Environmental Impact Statement. We are requesting that all decisions regarding this proposed development and/or its no action plan be postponed until the developer and his team complete the final Environmental Impact Statement. As we find the draft to be insufficient and inaccurate in describing the community to which this proposed development is taking place.

In 2010, the U.S. Environmental Protection Agency designated the entire North Shore of Staten Island as being one of its' 10 nation-wide Environmental Justice Show Case Communities. Due to the numerous clustering of noxious, toxic sites that are in proximity to each other and low-income communities and communities of color. Communities that have been unduly burdened for decades by pollution from businesses and industries here on Staten Island as well as air pollution that comes from as far away as Ohio and across the rivers from New Jersey. Communities that have numerous contaminated sites some of which have been in existence for some 150 years.

<https://archive.epa.gov/compliance/environmentaljustice/grants/web/html/ej-showcase.html>

Communities that lack many amenities that improve the overall environment and quality of life for residents and amenities that others in the City of New York and right here on Staten Island take for granted such as green open spaces.

NSWC has spent the past 15 years documenting the environmental disparities that Staten Island's North Shore Environmental Justice Communities face daily. Many recognizable urban anthropologist and journalist have written extensively about the North Shore Environmental Justice Community's plight.

In addition, New York City's City Council passed their Environmental Justice Bill into law this year.

<http://nylcv.org/news/city-council-passes-environmental-justice-bills/>

And yet in reading through the developers' Draft Environmental Impact Statement, not once have they indicated that this development is taking place in the Environmental Justice Community of Mariners Harbor. A community which is already experiencing numerous cumulative negative environmental impacts. And still their Draft Environmental Impact Statement chooses to ignore and or minimize these historic and well documented negative impacts thereby further marginalizing the people and this community.

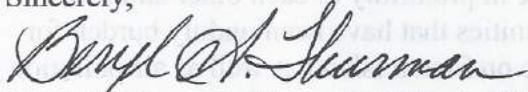
The document is void of the Environmental Justice conversation. To add insult to injury the developer wants to the community to pick the lesser of 2 evils. As their proposed development project and their "No Action Alternative" are for all intensive, purposes similar in negative impacts to the Environmental Justice Community of Mariners Harbor. In other words, one is as bad as the other and neither present any tangible benefits in improving the quality of life to the adjacent community.

Based on what they have described the developer is creating a more stressful environment for the residents. And if either plan is completed, it would manifest as an extreme hardship on this Environmental Justice community.

We want to see a final Environmental Impact Statement that reflects the true constitution of the community to which this development is being proposed in.

Thank you for your time and consideration in reference to this most distressing situation.

Sincerely,



Beryl A. Thurman, Executive Director/President
NSWC

Cc: Council member Debi Rose, Borough President James Oddo, SI/DCP Director Len Garcia Duran, Senator Diane Savino, Assemblyman Michael Cusick and other interested parties.

> -----
> On Sun, 6/25/17, Beryl Thurman <nswcsibt@aol.com> wrote:
>
> Subject: Additional Comments for the Draft Environmental Impact Statement (DEIS) for
> the South Avenue Retail Development (CEQR No.17DCP030R) (AKA) The Graniteville
> Tree Swamp Address: 534 South Avenue, Block 1707/Lots 1 and 5.
> To: rdobrus@planning.nyc.gov
> Cc: drose@council.nyc.gov, JOddo@statenilandusa.com, lgarcia@planning.nyc.gov,
> savino@senate.state.ny.us, cusickm@assembly.state.ny.us, emartin@council.nyc.gov,
> JRazefsky@statenilandusa.com, bpatters@nysenate.gov, engles@assembly.state.ny.us,
> bdeblasio@cityhall.nyc.gov, abarnes1@cityhall.nyc.gov, otcnlisted2@msn.com,
> chagen72@gmail.com, NRPA2@aol.com, argenzv@nyassembly.gov, cb1anjail@aol.com,
> mcbethj@coned.com
> Date: Sunday, June 25, 2017, 9:46 PM
>
>
> Dear Director Dobruskin,
>
> I hope that you are doing fine. Attached are
> additional comments concerning the Draft EIS for the
> proposed South Avenue Retail Commercial Space Development.
> In reviewing the developer's Draft Environmental Impact
> Statement there seems to be some important issues that are
> missing concerning the Mariners Harbor Community.
>
> The developer has excluded the demographic
> analysis in his DEIS of the Mariners Harbor Community as
> well as that it, like the rest of the North Shore is an
> Environmental Justice Community and all of the numerous
> negative cumulative impacts that would accompanying being an
> Environmental Justice Community.
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> Thank you for your time and consideration and we look
> forward to receiving a reasonable response to this.
>

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> Sincerely,
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> Beryl A. Thurman, Executive
> Director/President
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> NSWCS
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> Creating Livable Communities
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> Credit and Debit Card Donations to NSWCS can be made through
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> SI North
> Shore Resilience Website, watch the video.
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> <http://www.sinorthshorereliance.org>
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> SAVE ALL OF ARLINGTON
> MARSH!
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> SAVE ALL OF THE GRANITEVILLE TREE SWAMP!!
>
> SAVE THE NORTH SHORE'S FRESH WATER WETLANDS!!!
>
> Let justice be done although the
> heavens may fall.

From: Beryl Thurman <nswcsibt@aol.com>

Date: June 27, 2017 at 12:11:17 PM EDT

To: <rdo Brus@planning.nyc.gov>, <drose@council.nyc.gov>, <bdeblasio@cityhall.nyc.gov>

Cc: <JOddo@statenilandusa.com>, <lgarcia@planning.nyc.gov>, <savino@senate.state.ny.us>, <cusickm@assembly.state.ny.us>, <emartin@council.nyc.gov>, <JRazefsky@statenilandusa.com>, <bpatters@nysenate.gov>, <engles@assembly.state.ny.us>, <abarnes1@cityhall.nyc.gov>, <chagen72@gmail.com>, <NRPA2@aol.com>, <argenzv@nyassembly.gov>, <cb1anjail@aol.com>, <mcbethj@coned.com>, <OTCNLISTED2@msn.com>, <epsnyc1@yahoo.com>

Subject: Re: Additional Comments for the Draft Environmental Impact Statement (DEIS) for the South Avenue Retail Development (CEQR No.17DCP030R) (AKA) The Graniteville Tree Swamp Address: 534 South Avenue, Block 1707/Lots 1 and 5.

Dear Director Dobruskin, Council member Rose and Mayor De blasio,

The point that all of us are making is that, it is 6 years after Hurricane Irene, that did significant damage on the North Shore, and 5 years after Hurricane Sandy to which we credit our existing wetlands for buffering the Mariners Harbor/Arlington communities from the storm surges and flooding.

And the North Shore Waterfront and Environmental Justice communities still do not have a resiliency plan that has been implemented for the entire North Shore. Yet various development projects that impact the wetlands that are protecting us are still taking place as if none of the above storm activities ever happened.

We are not seeing any coordinated efforts to deal with protecting the wetlands on the North Shore by the officials and we are not seeing a coordinated effort in resiliency protection for our people from our City, State, or Federal Officials. The resiliency conversation by our officials has never taken place with North Shore Communities period. Never.

By the way Ed Szczepanski mentioned the NY/NJ Port Authority's Master Plan the link to their website is below, however, since everyone is operating in their own silos, once again we have no idea what this means in terms of the impact to Arlington Marsh and in turn Mariners Marsh Park and the Mariners Harbor and Arlington communities. What we do

know is that during Hurricane Sandy New York Container Terminal was under water, we do know that. And for those that don't know this New York Container Terminal/Howland Hook was built on a tidal wetland. Water always knows where it has been.

<http://www.panynj.gov/port/port-master-plan.html>

But what we want to know from you is where does all of this leave us?

Thank you for your time and we look forward to having meaningful discussions involving protecting our wetlands in their entirety and our communities having a comprehensive resiliency plan in place.

Sincerely

Beryl A. Thurman, Executive Director/President
NSWC
Creating Livable Communities

Credit and Debit Card Donations to NSWC can be made through the NSWC website below...

www.nswcsi.org

SI North Shore Resilience Website, watch the video.

<http://www.sinorthshoresilience.org>

SAVE ALL OF ARLINGTON MARSH!
SAVE ALL OF THE GRANITEVILLE TREE SWAMP!!
SAVE THE NORTH SHORE'S FRESH WATER WETLANDS!!!

Let justice be done although the heavens may fall.

The North Shore Waterfront Conservancy of Staten Island, Inc. (NSWC or NSWCSI) is a 501-C3, Public Charity all donations are tax deductible to the full extent of the law.

The North Shore Waterfront Conservancy of Staten Island, Inc., P.O.Box 140502, Staten Island, NY. 10314

To stop receiving e-mails from the North Shore Waterfront Conservancy of Staten Island. Please REPLY to this message with the word UNSUBSCRIBE in the message Box.

From: Beryl Thurman [mailto:nswcsibt@aol.com]
Sent: Monday, July 10, 2017 8:43 PM
To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>

Subject: NSWC Comments for the NYC City Planning Commission -

Dear Director Robert Dobruskin:

Would you be so kind as to forward the North Shore Waterfront Conservancy of Staten Island, Inc.'s comments of opposition to the DEIS for the South Avenue Retail Development to the NYC City Planning Commissioners in order to meet the July 17, 2017, comment deadline?

The North Shore Waterfront
Conservancy of Staten Island, Inc.
P.O. Box 140502 Staten Island, NY.
10314

July 10, 2017

To: Marisa Largo, Chair
To: Kenneth J. Knuckles, Esq., Vice Chairman, Ryann Besser, Irwin G. Canton P.E., Alfred C. Cerullo, III, Cheryl Cohen Effron, Michelle de la Uz, Joseph Douek, Richard W. Eaddy, Hope Knight, Anna Hayes Levin, Orlando Marin, Larisa Ortiz

NYC City Planning Commission: Reference: the Draft Environmental Impact Statement (DEIS) for the South Avenue Retail Development, CEQR No. 17DCP030R, ULURP No. 160174 ZSR and 150359 MMR, SEQRA Classification: Type 1 (AKA) The Graniteville Tree Swamp
Address: 534 South Avenue, Block 1707/Lots 1 and 5.

Dear Chair Marisa Largo and NYC Planning Commissioners:
In reviewing the South Avenue Retail Development's Draft Environmental Impact Statement. We are requesting that all decisions regarding this proposed development and/or its no action plan be postponed until the developer and his team complete the final Environmental Impact Statement. As we find the draft to be insufficient and inaccurate in describing the community to which this proposed development is taking place.

The Omission Of Mariners Harbor being an Environmental Justice Community in the DEIS:

In 2010, the U.S. Environmental Protection Agency designated the entire North Shore of Staten Island as being one of its' 10 nation-wide Environmental Justice Show Case Communities. Due to the numerous clustering of noxious, toxic sites that are in proximity to each other and low income communities and communities of color. Communities that have been unduly burden for decades by pollution from businesses and industries here on Staten Island as well as air pollution that comes from as far away as Ohio and across the rivers from New Jersey. Communities that have numerous contaminated-sites some of which have been in existence for some 150 years.

<https://archive.epa.gov/compliance/environmentaljustice/grants/web/html/ej-showcase.html>

NYC Agencies Failure to provide Staten Island's Existing Environmental Justice Communities With Adequate Storm Water Management, Drainage, Resiliency and Implementation Plan:

Since 2005 NSWC has been asking NYC Officials to prepare vulnerable North Shore Environmental Justice Communities for increase severe storm activities due to Climate Change Activities. NYC Officials had been made aware of NYC's vulnerability to Climate Change activities for at minimum 2 decades by scientists and academia.

<https://www.theguardian.com/us-news/2014/nov/05/climate-scientist-klaus-jacob-warning-new-york-city-hurricane-sandy>

<https://www.voanews.com/a/lessons-learned-from-hurricane-sandy/1778909.html>

<http://www.hunter.cuny.edu/ccpd/repository/files/ChickenLittleaFerrisWheelandDisorder1yDevelopmentonStatenIslandsNor.pdf>

For Staten Island's existing Environmental Justice Communities receiving adequate storm water management and resiliency protection from severe storm weather activities from the City of New York and its agencies is not a guarantee. Six years after Hurricane Irene and five years after Hurricane Sandy making Staten Island's existing Environmental Justice Communities safer from Climate Change issues is not even on the City's Agencies' top 10 ten list of something that needs to be done.

The City recognizes that Staten Island's existing North Shore Environmental Justice Communities are lacking in green open spaces with forested shade canopy, lacking

in topographical down hill flooding protection - the very quality of life infrastructure measures that others in the City of New York and right here on Staten Island take for granted. Yet with this developers' proposal there is no counter proposal by the City of New York to mitigate what this developer will be taking away from this vulnerable community.

?
NSWC has spent the past 15 years documenting the environmental disparities that Staten Island's North Shore Environmental Justice Communities face daily. Many recognizable urban anthropologist and journalist have written extensively about the

North Shore Environmental Justice Community's plight. In addition, New York City's City Council passed their Environmental Justice Bill into law this year.

<http://nylcv.org/news/city-council-passes-environmental-justice-bills> HYPERLINK
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And yet in reading through the developers' Draft Environmental Impact Statement, not once have they indicated that this development is taking place in the Environmental Justice Community of Mariners Harbor. A community which is already experiencing numerous cumulative negative environmental impacts. And still their Draft Environmental Impact Statement chooses to ignore and or minimize these historic and well documented negative impacts thereby further marginalizes the people and this community.

The document is void of the Environmental Justice conversation combined with devastating impacts of what Climate Change impacts will look like to a vulnerable community that does not have the means or resources to rebound from natural and man made disasters. To add insult to injury the developer wants the community to pick the lesser of 2 evils. As their proposed development project and their "No Action Alternative" are for all intensive, purposes similar in negative impacts to the Environmental Justice Community of Mariners Harbor. In other words, one is as bad as the other and neither present any tangible benefits in improving the quality of life to the adjacent community.

According to the U.S. Army Corp of Engineers there are 7 fresh water wetlands on site, 6 of which are considered as isolated fresh water wetlands in the forested area

that the developer is proposing to build on. During Hurricane Sandy it was Mariners Marsh a fresh water wetland that helped to absorbed the storm surge's overflow from Arlington Marsh a tidal wetland providing protection to the 4,000 plus residents of Arlington and Mariners Harbor communities.

Based on what they have described the developer is creating a more stressful environment for the residents. And if either plan is completed, it would manifest as an extreme hardship on this Environmental Justice community.

?
It is imperative to our well being and safety that all wetlands and forested areas even those that are privately owned become a part of our Climate Change Buffer in order to protect these vulnerable people and communities, who will be the first to experience the hardships that come with severe weather. And who are the least to be able to rebound from these natural and man made disasters.

We want to see a final Environmental Impact Statement that reflects the true constitution of the community to which this development is being proposed in. So that everyone can make an informed decision involving this proposed development and the safety of the Mariners Harbor Community.

Thank you for your time and consideration in reference to this most distressing situation.

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Sincerely,
Beryl A. Thurman, Executive Director/President
North Shore Waterfront Conservancy of Staten Island, Inc.

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Cc: Council member Debi Rose, Borough President James Oddo, SI/DCP Director Len Garcia Duran, Senator Diane Savino, Assemblyman Michael Cusick and other interested parties.

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NSWC
Creating Livable Communities

Credit and Debit Card Donations to NSWC can be made through the NSWC website below...

www.nswcsi.org

SI North Shore Resilience Website, watch the video.
<http://www.sinorthshorerresilience.org>

SAVE ALL OF ARLINGTON MARSH!
SAVE ALL OF THE GRANITEVILLE TREE SWAMP!!
SAVE THE NORTH SHORE'S FRESH WATER WETLANDS!!!
Let justice be done although the heavens may fall.

The North Shore Waterfront Conservancy of Staten Island, Inc. (NSWC or NSWCSI) is a 501-C3, Public Charity all donations are tax deductible to the full extent of the law.

The North Shore Waterfront Conservancy of Staten Island, Inc., P.O.Box 140502, Staten Island, NY. 10314

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The North Shore Waterfront Conservancy of Staten Island, Inc.
P.O. Box 140502
Staten Island, New York 10314

July 26, 2017

To: Marisa Largo, Chair

To: Kenneth J. Knuckles, Esq., Vice Chairman, Ryann Besser, Irwin G. Canton P.E., Alfred C. Cerullo, III, Cheryl Cohen Effron, Michelle de la Uz, Joseph Douek, Richard W. Eaddy, Hope Knight, Anna Hayes Levin, Orlando Marin, Larisa Ortiz

NYC City Planning Commission: Reference: The Draft Environmental Impact Statement (DEIS) for the South Avenue Retail Development, CEQR No. 17DCP030R, ULURP No. 160174 ZSR and 150359 MMR, SEQRA Classification: Type 1 (AKA) The Graniteville Tree Swamp
Address: 534 South Avenue, Block 1707/Lots 1 and 5.

Dear Chair Marisa Largo and NYC Planning Commissioners:

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Date: August 17, 2015

Staten Island's North Shore Community Resiliency Assessment Memorandum

This memorandum will speak about the concerns residents and businesses have in reference to sea level rising, storm surges and flooding on the North Shore of Staten Island, New York. Being that we are experiencing extreme weather conditions now this is no longer a situation that we feel that we can afford to take a wait and see approach on as the events are already happening.

Since Hurricane Sandy almost three years ago, the North Shore Waterfront Conservancy has discussed the need for increasing resiliency with the residents, businesses, and public officials in the Environmental Justice Communities on Staten Island's North Shore. The general consensus is thus far the City's response to climate change events has been inconsistent, especially when it comes to acknowledging that water rises and floods on all sides of Staten Island, making many businesses and/or residential communities vulnerable to the effects of sea level rising, storm surges and flooding.

The City's recent decision to undertake a design and planning study of an integrated flood protection system on Staten Island's North Shore is an important opportunity to address these concerns and the public's perception. We cannot emphasize enough that this is a time sensitive matter and that the businesses and residential communities are only as safe as the next nor'easter and or hurricanes as outside of Arlington Marsh's 80 acre tidal wetland, there are no resiliency buffers that are sufficient enough to protect Staten Island's North Shore waterfront communities. This is a situation that even though residents may not be talking about in general conversation, they are nonetheless keenly aware of it on some level.

NSWC has taken the lead in identifying issues in this report, that we feel will enable the city and their consultants to move faster toward identifying possible solutions. We look forward to discussing these with the City as it launches its study.

Coastal Flooding/ Sea Level Rising:

Since many of us were in our homes and only a few of the North Shore residents have actual view points of the Narrows, Kill Van Kull, lower Newark Bay and the Arthur Kill. Keep in mind that before the night that Hurricane Sandy hit none of the North Shore residents had ever heard of zone A. In addition most of the maps showing inundation areas are too small to be able see any identifiable land marks or street names.

The entire North Shore of Staten Island is vulnerable to coastal flooding. In particular, North Shore communities of Rosebank, Stapleton, West Brighton, Port Richmond, Elm Park, and Arlington have low lying areas that are extremely vulnerable to coastal flooding. While Fort Wadsworth, sections of Clifton, Tompkinsville and St. George, New Brighton, and Mariners Harbor are generally at a higher elevation and not as vulnerable. However, these communities mentioned for having higher points of elevation also have low lying areas. Therefore any treatment to eliminate coastal flooding must be done in a unified manner that makes the coastal protections congruent.

The City study should take the following actions:

- It would be useful for the City to have film or even a model of what flood prone areas look like during storm surges when they hit land, preferably densely populated areas.
- The City should provide detailed maps (on line and in hard copy) to acquaint residents with what the new zones are and to zoom in on inundation points so that residents can see land marks and or street names in order that they can identify how close they are to those areas and which way they will need to go to evacuate.
- The City should work with television and other media outlets in ensuring that the public sees film and/or visual models showing inundation points and nearby landmarks and or street names.

Storm water Management:

If the next hurricanes are as predicted the North Shore will be in serious trouble especially if there are heavy rains and high winds involved. Staten Island's North Shore's drainage system is at least 100 years old. Catch basins often become full and or blocked are useless in dealing with storm water runoff. There are also areas that have no sewers or catch basins and dependent on streets and curbs to move the storm water. This causes the streets to become flooded and the water to jump the curb and flood sidewalks and nearby properties. In densely populated areas where development has brought a lot of impervious surfaces leaving no place for rain to go, it has ended up in basements as it goes downhill during major rain events such Hurricane Irene.

Staten Island has more fresh water and tidal wetlands than any other borough in New York City and in dealing with storm water management, we need to begin recognizing and enhancing the value of the fresh water wetlands in protecting existing communities.

NSWC has asked many times over that NYS DEC review its mapping of wetlands and to decrease the size of the wetlands' protection mandate in order to capture more of them in their mapping so that the fresh water wetlands can continue to be used as rain/snow runoff points. Currently in order for a fresh water wetland to be mapped and protected it has to be no less than 12.4 acres. With the antiquated storm water system that we are currently operating under we need every last one of the existing wetlands even though they are privately owned to help with protecting existing communities.

In addition because we are on a Combine Sewer Overflow system the Port Richmond DEP Sewer Treatment Plant easily becomes overwhelmed during rain storms and closes the water gates to the plant allowing the runoff and household waste to go directly into the Kill Van Kull. This plant located on Richmond Terrace is in a low line area and was flooded during Hurricane Sandy although it never went off line.

- The City should assess the contribution made by all existing freshwater wetlands and other public and private green spaces and retain storm water and reducing flooding. It should identify ways and means to ensure that flooding in communities is not made worse by allowing permitting for development of wetlands less than 12.4 acres.

- The City should assess the benefits of acquiring easements and/or to purchasing private properties with wetlands for storm water management similar to Mid Island Blue Belt system.
- The City should identify means of capturing and redirecting surface runoff through green infrastructure practices so that storm water can be filtered, treated and released before causing overflows in the combined sewer system or separate storm sewers.

Coastal Erosion:

The entire North Shore of Staten Island is suffering from severe coastal erosion and it is our understanding that unless the area had a bulkhead at one time NYS DEC will not allow for any new development to take place in the water. The North Shore waterfront has a gap tooth smile where there are properties with bulkheads sitting next to properties that don't have any resiliency buffers. As we have documented in the NSWC SUCRA Power Point Presentation on resiliency. Therefore when storm surges happen the properties without any protections become the access points to flooding the properties with a bulkhead from the sides and rear of the property. Most of the businesses on the waterfront are willing to allow their properties to go under water and allow for the insurance companies to take care of any damages.

Quite a few of the properties that are not resilient to climate change are City owned and have not been maintained by the agencies that they are under DCAS, SBS, EDC as these agencies state that they do not have the resources to maintain these waterfront properties. In addition many of these properties have never been tested for contaminants. Something that we feel should be a matter of ownership, if you own the property then at the very least a Phase 1 and 2 report should be done on the properties before coming up with a plan of action to what to do next with them especially if these properties are within a few feet of a water source and residential communities.

- The City should assess the importance of consistent action across individual waterfront properties on flood protection for the whole community. The City should develop a long term strategy across property lines in particular looking at its own management practices of its own shore lines. The City should consider the possibilities of taking immediate action even if it is for a short term solution to shore up City waterfront properties. And have businesses waterfront properties enter into an agreement to shore up their properties, all of this should be done in a unified way even it is through a mandate from the City and State. The waterfront properties on Staten Island's North Shore are quickly eroding and in order to prevent further erosion and loss of land and adjacent property damages. A short or even medium term shore up solution must be implemented. The City and State need to coordinate that these needed shore line improvements can be permitted by the state.
- In addition the DEP & DEC should come up with permitting strategies to allow consistency in the building of bulkheads, berms, or soft shore natural areas in order that they provide protections for adjacent properties and the residential communities that are behind the waterfront properties.

communities who will receive the greatest impact and therefore the greatest risk when it comes to safety.

It is not to say that the government is not working on solutions, however, the efforts are not connected and so as one project is taking place it is literally undermine the actions of another project. There is no oversight to make sure that everyone understands what the end goal is and to make sure that all of the agencies and people are all working together to make sure that they meet the end goal. Residents are seeing lots of unorganized activities with most of it having little to do with providing them with safety from Climate Change issues. In short there is no leadership involving this issue.

At the same time, the City does not take ownership for any of the events that they encourage by allowing permits and activities to take place in areas that have no resiliency measures in effect. This is making living on or near the waterfront a buyer beware situation in terms of exposure to contaminants via climate change issues. Or living near a fresh water wetland that is only looked at by developers as an opportunity to build a big box store or more housing because it may or may not fall under the NYS DEC mapping policy. For example: Nicholas Estates, built on 3 fresh water wetlands, 9.5 acres and directly across the street from 3 contaminated flood prone properties including the Archer Daniels Midland Manhattan Project (radioactive) Storage Site. <http://nicholasavenueestates.com/>

- The City needs to do a better job of coordinating their resiliency efforts and that of other agencies at various levels so that the resiliency work that is being done is functional and therefore is sustainable.
- The City should develop a mechanism by which it can reference likely climate change impacts. For example, understanding how a fresh water wetland is actually protecting an existing community by keeping it from being flooded and therefore should not be developed.

Social Resiliency Awareness:

Because residents in Environmental Justice Communities will be directly impacted by Climate Change and they have the least amount of resources to deal with the negative outcomes. It is essential that the people of these communities participate in a meaningful way in the resiliency development of their communities from the beginning, through the middle and to the end of the process.

- The City has to do a better job of engaging and listening to the residents of the Environmental Justice Communities and acting on their recommendations. Because they are speaking from experiences of living in the community and observing the environmental outcomes.

Conclusion:

When you live on an island you need to have that kind of leeway in your policies to help to protect existing communities.

People are waiting for the City to live up to the leadership role that it claims it is has in dealing with climate change. But that residents have seen little of in terms of action. Everything that is happening is happening because of the lack of action to mitigate poor practices and policies.

Residents are beyond venting their frustration at meetings. They want to see tangibles in terms of actions. Tell us what you have and we'll tell you whether or not we think it will work. With this being said residents are anxious to see what the City will bring before them and out of those plans what will be implemented.

References:

NSWC's "Staten Island's Gold Coast: 5.2 miles from St. George to Arlington"

NSWC's "Shore Up: Community Resiliency and Adaptation Project Power Point Presentation"

U.S. Department of Energy's Legacy Department:

http://energy.gov/sites/prod/files/2013/05/fo/FUSRAP%20Stakeholder%20Report_1.pdf

Gotham Gazette: <http://www.gothamgazette.com/index.php/environment/227-staten-islands-toxic-stew>

Is Bayonne Bridge Project Unearthing Harmful Radiation? By Scott Marlow

<http://bayonnelocal.com/uranium-still-contaminates-kill-van-kull-gateway-to-port-elizabeth/>

Dr. Nicholas K. Coch; <http://grist.org/cities/nyc-hurricane-expert-sandy-wasnt-the-big-one/>

Contact:

Beryl Thurman, Executive Director/President

North Shore Waterfront Conservancy of Staten Island. Inc.

P.O. Box 14502 Staten Island, New York. 10314

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August 7, 2017

Robert Dobruskin, AICP, Director
New York City Department of City Planning
Environmental Assessment and Review Division
120 Broadway, 30th Floor
New York, New York 10271
Email: rdobrus@planning.nyc.gov

RE: Proposed Second Avenue Retail Development CEQR No. 17DCP030R

Dear Mr. Dobruskin,

NY/NJ Baykeeper would like to take this opportunity to comment on the Draft Environmental Impact Statement (DEIS) prepared for the proposed South Avenue Retail Development in the Graniteville neighborhood of Staten Island.

According to the National Environmental Policy Act (NEPA), an environmental impact statement “shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.”¹ The following comments will reflect our belief that the DEIS prepared for South Avenue Retail fails to meet this very basic direction by using a similar build option as its No Action alternative, rather than the current as is condition of the wooded land. Using two similar build options, with no other alternatives, in the DEIS deprives the decision makers and public a meaningful comparison to consider in regard to this project site’s impact on their neighborhood.

NY/NJ Baykeeper has a significant interest in preserving open space in Staten Island, particularly in a neighborhood as already well developed as Graniteville. Adding yet another unnecessary retail development in place of a beautiful wooded area raises significant concerns, as it is not supported by local need or desire. The fact that this particular development abuts a significant tract of protected tidal wetlands only compounds the issue, putting even more green space at risk of loss.

Staten Island sits at the heart of the greater New York metropolitan area, with a staggering population of 20.2 million people at a density of around 2,400 people per square mile.² This is a metro area with more than enough opportunity to shop, but with dwindling opportunity to enjoy nature as wholesale clubs and mega-malls attempt to fill every unoccupied tract of land. This project is proposed for a residential neighborhood with a host of existing retail establishments and shopping centers, there is no additional need or call for more from the residents of the Graniteville neighborhood. There has been no reasoning presented for how removing precious green space for yet another shopping center will help the people of Graniteville live fuller, healthier lives. Instead, the developer has chosen to push for an

¹ 40 CFR § 1502.1 Purpose.

² <https://censusreporter.org/profiles/31000US35620-new-york-newark-jersey-city-ny-nj-pa-metro-area/>

even more impactful retail plan, one requiring the DEIS discussed here. Ultimately, the existing green space has a far greater value to the community than more retail locations.

Fundamentally Flawed DEIS

In the DEIS presented for the South Avenue Retail project, the No Action alternative is nearly identical to the plan with action. While a No Action plan that describes a lesser alternative for a project is permissible under NEPA, the differences between the two options presented here are negligible enough to make it a comparison in name only. Per NEPA, the DEIS “should present the environmental impacts of the proposal and the alternatives in comparative form, thus *sharply defining the issues* and *providing a clear basis for choice among options* by the decision maker and the public.”³ Therefore, for any meaningful comparison to take place, and to meet the spirit of NEPA’s EIS requirement at all, the No Action plan in this instance should represent the land in its current state compared with the impacts of one or both action plans. Only then can the decision makers and public make a truly informed decision on the potential impact of the project.

Presenting nearly identical plans as No Action and With Action is misleading, as it obviously leads to a minimal impact result. Additional comparisons of existing conditions to one or both action plans should be required before proceeding so that the actual impact to the site and surrounding neighborhood can be reviewed and considered. A brief overview of the two DEIS options presented side-by-side illuminates the lack of quantifiable difference:

Proposed Project (i.e. With Action)	No Action Alternative
226,000 gross square feet (gsf) of new retail including:	228,250 gsf of new retail including:
92,000 gsf wholesale warehouse space	174,750 gsf – 2, 1 or 2 story buildings (6 uses)
67,000 gsf supermarket	42,000 gsf – 4, 1-story buildings (5 uses)
16,000 gsf restaurant	1,000 gsf gas station & automated bank teller
50,000 gsf “destination retail”	
1,000 gsf gas station & automated bank teller	
838 accessory parking spaces	736 accessory parking spaces

The proposed project requires special permissions to re-zone the area for retail over 10,000-zoned square feet, while the No Action alternative requires no additional permissions. This is essentially the only quantifiable difference in the plans, while the negative effects of either development are equally harmful to the local residents. However, since the comparison in the DEIS is only between these similar alternatives, the harmful effects appear negligible on paper. The reality of either build, discussed in more detail below, is significant negative impacts to the neighborhood and its residents.

Traffic

The project site is currently a wooded parcel of land adjacent to a US Army Corps of Engineers delineated tidal wetland. The surrounding roads lead to a major highway and are therefore fairly busy during certain times of day and certain days of the week. Adding retail establishments with at minimum 736 parking spaces means that the number of cars in and out of the neighborhood will increase drastically. Additionally, the tractor-trailer traffic will also increase significantly, especially in the With Action plan. The wholesale warehouse and supermarket options are likely to receive shipments multiple

³ 40 CFR §1502.14 Alternatives including the proposed action. (emphasis added)

times a week (possibly even daily during the holidays) on top of the shipments to 6 different retail stores and gas station. The DEIS addresses this by showing a comparison of traffic impact between the No Action and the With Action plans, and not by including a comparison of existing conditions versus developed conditions.

As anyone who has driven by or near a wholesale warehouse location can confirm, that type of business attracts a far larger and more frenetic crowd day-to-day than the average retail store. Combining that with a supermarket in the same development is a guaranteed way to make the local streets chaotic on the average weekend, and unbearable during the busiest retail times of the year. The DEIS compares the difference as though there is no difference of which to speak, and the difference between 736 and 838 parking spaces is very little difference at all. However, the difference between zero parking spaces and the attraction of cars to a retail development with 736 or 838 parking spaces presents a drastic uptick in the expected traffic in the area.

Air Quality

With the significant increase in vehicle traffic through the area, comes a significant increase in carbon emissions. The cars and tractor-trailers entering, driving around, idling within the retail lot will significantly increase the carbon emissions in the area as compared to the existing site conditions. The DEIS does not make that comparison, though, and instead compares the numbers between the two build options. Comparing emissions data between No Action and With Action is not a valid gauge of the increase in emissions that will occur if either version of the project is built.

The DEIS states that “the incremental traffic resulting from the proposed project would not exceed the PM emission screening threshold.” This incremental increase is between No Action and With Action, not between existing, natural conditions and one or both alternatives. Comparisons like this do not promote informed decision making or meaningful review of the proposed project’s impact. It is even less helpful when comparative background data used is gathered from sites in Harlem, the Bronx, or Division Street in Manhattan; all of which have significantly higher background levels than the green space and residential areas that exist in Graniteville today.

When it comes to air quality, shortcut comparisons like these should not be taken lightly. Carbon emissions from added vehicle traffic and the potential for increased exposure to carcinogens from cigarette smoke due to the added number of people milling around the site should be taken very seriously and judged against the existing site conditions, not the two build alternatives. A more thorough and realistic review of potential air quality changes should be conducted in order to protect the health and wellbeing of Graniteville’s residents.

Noise Pollution

The DEIS compares the change in noise based on the No Action versus With Action alternatives. It does not take an expert on noise pollution to know that cars, trucks, people, and miscellaneous mechanical equipment make significantly more concentrated noise than a large wooded area. However, there is no significant increase found in the DEIS comparisons because it is not considering the change from current conditions. There is no doubt that the residential homes nearest to the development will be most affected by the change in background noise, but the residents are not presented with a meaningful

comparison through the DEIS on which to base informed opinions on how the proposed development will affect their daily lives.

Neighborhood Character

Very closely related to the change in background noise in the area is the significant change to the overall character of the neighborhood. This project would drastically change the character of the neighborhood, causing a significant uptick in traffic, congestion, and urbanization that is neither needed nor wanted by local residents. Graniteville is a predominantly residential area, with several existing retail and manufacturing uses, and little available green space. What little future development is planned for the area immediately surrounding the project site can be identified as mostly more residential. What this neighborhood needs is to retain its natural areas, as they enhance the quality and character of the neighborhood.

Water Quality

The wetlands and natural floodplain on the site currently store and filter the excess water from the upland area, but the change to impervious surface and active retail uses will certainly strain the filtering capabilities of the remaining wetlands beyond capacity. At the public hearing held recently, there was mention of including bioswales and shrub plantings. How could this possibly replace a mature forest and natural area? The short answer is that it cannot, and any benefit these wetlands and natural floodplains provide to the surrounding area will be lost.

The DEIS fails to address the vast difference between the existing conditions and developed conditions, specifically the significant increase in polluted runoff from vehicles, ice melt, gas station activities, and retail activities. The proposed South Avenue project would add a significant amount of unnecessary impervious surface to an already heavily paved borough. New York City has been tending toward preserving green space and increasing green infrastructure over the past several years in an effort to reduce the volume of stormwater on an already taxed municipal sewer system and address localized flooding. Adding a large-scale retail development in place of wetlands-adjacent green place goes directly against this sort of purposeful planning and the efforts of New York City to make its neighborhoods more resilient.

Additionally, the increase in end-users will increase the strain on the aged and overwhelmed sewer system on Staten Island. Issues with stormwater inundation on the municipal separate storm sewer system already cause water quality issues in the area. Tying a large retail development into this system will not only increase Staten Island's infrastructure burden but also risks undoing any small progress made on improving the municipal sewer systems thus far. At the public hearing we were told that they would retain 100% stormwater onsite, but they did not state for what size storm.

The land adjacent to Graniteville Swamp Park has the ability to help protect the neighborhood from future storms and flooding. Removing the permeable green space that helps absorb and filter water will absolutely have an impact on the way storms affect the neighborhood, a factor conveniently glossed over in the DEIS. The DEIS addresses only the difference between two full-build alternatives, and not a more realistic comparison between the approximate 28 acres of land as it is now and a future with roughly 17 acres of that same land developed. Above all else, converting existing natural areas into

paved, big box-stores and parking lots in our most vulnerable communities is not consistent with New York City's long-term resiliency goals.

Loss of Open Space

Lastly, Staten Island falls within the NY-NJ Harbor Estuary, home to 20 million people and hundreds of bird, fish and wildlife species. Preserving natural habitat and open space is essential in this heavily developed area. Open space is essential to our livelihood because it protects water supplies, improves water quality, protects flood prone areas, and creates and improves habitat. If permitted, this development would unnecessarily wipe out what little open space Graniteville has and the damage would be irreversible.

NY/NJ Baykeeper submits this comment letter in the hope that your review will take a serious look at the greater overall impact and need of this project, not merely on water quality, emissions, or traffic, but also on the effects on the quality of life for Graniteville residents. The DEIS, as presented, does little to aid in the meaningful comparison of reasonable alternatives by failing to include a true no build alternative and limited alternative analysis. Protecting their health and wellbeing should be the first priority, and to do this a far more in-depth review of the project's potential impact must be ordered prior to deciding on the fate of this land.

Respectfully submitted,



Debbie Mans, NY/NJ Baykeeper
Baykeeper and Executive Director



Michele Langa
Staff Attorney

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July 14, 2017

Hello,

The following are comments regarding the proposed development of 534 South Avenue, Staten Island, New York. Please, distribute these copies to each member of the City Planning Commission.

Thank you,

Clifford Hagen

President

Protectors of Pine Oak Woods

PO Box 140747

Staten Island, New York 10314

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June 2, 2017 Notice of Completion of the Draft Environmental Impact Statement

South Avenue Retail Development

(CEQR No. 17DCP030R), (ULURP No. 160174 ZSR and 150359 MMR)

Opposed

Lot 1 of the proposed project site located at 534 South Avenue (Block 1701, Lots 1 and 5) was acquired on March 8, 1977, pursuant to a purchase made February 1976. The Alpert brothers acquired Lot 5 of the proposed project site on November 12, 1984. In Alpert V. Alpert 026735-2009 (5-3-2011) we see that William Alpert, the father of Charles and Joseph (Josif A.) Alpert, speculated on properties which, after intra-family court proceedings, the property in question came to Charles and Joseph.

The Alpert brothers have held the property and considered development for decades. Finally, on June 29, 2012, a Stipulation of Settlement was agreed upon by the Alpert brothers and the NYS Department of Conservation.

The Stipulation acknowledges that in December 1987, the Alpert brothers filed an appeal which challenged the designation of freshwater wetlands on their property. They sought a relief of hardship and the NYS DEC contested their appeal. The Stipulation lists mutual agreements between NYS DEC and the Alpert brothers that, with adherence, would allow for development. It is now the responsibility of the Department of City Planning to guarantee strict adherence.

According to the 2012, Stipulation *"The Site Plan shows a tentative wetland enhancement area in the bed of Morrow Street, The Appellants do not own Morrow Street and will request that it be de-mapped in connection with development of the property. If the street bed is de-mapped, it will become part of the wetland enhancement area."* The Stipulation says nothing of "a cul-de-sac on the City Map at the southern terminus of the street," which is proposed in the DEIS. This begs the question, why propose a cul-de-sac, not mentioned in the 2012, Stipulation, if there is no intention to build the cul-de-sac? The cul-de-sac is again mentioned in the DEIS during a description of square footage and the zoning lot area calculation for the development of the site. How does the creative use of an unintended cul-de-sac affect the calculations? For if, as the 2012, Stipulation states, that *"Appellants shall cause a deed restriction, based on a template that has been provided by DEC, to be recorded in the property records for the Property to ensure that the Wetland Enhancement Area and the Buffer Planting Area, as designated on the Site Plan, will be kept as Natural Areas and not become subject to development,"* then why propose a cul-de-sac?

The DEIS goes on to state *"Since the city does not hold title to these mapped but unbuilt streets, the proposed demapping actions would not add lot area to any properties. Control of this land area would continue to be held by the respective owners of those properties."* *"The demapping of the southern (unbuilt) portion of Morrow Street is*

proposed in response to the desire of NYSDEC to preclude the potential for future development in adjacent undeveloped wetland areas." Again, why propose a cul-de-sac at the southern terminus of Morrow Street?


Below the title Natural Resources the DEIS contains a number of inaccurate statements. The DEIS states that "the applicant believes that proper storm water management practices and wetland enhancements would result in an overall improvement to natural resources on site." Paving asphalt atop acres of rich habitat and funneling storm waters into a landscaped retention basin is in no way an "improvement." Acknowledging a need to compensate for a loss of freshwater wetland adjacent area the DEIS proposes "freshwater buffer plantings, and freshwater and tidal wetland adjacent area enhancements," as compensation. Planting evergreen shrubbery and hedgerows does not compare with the native ecology which would be irreparably destroyed by the proposed development.

Similarly, the notion that piping plover and roseate terns are the only endangered or threatened species to be considered at this site indicates the misleading inaccuracy of the DEIS. The site in question is not a hospitable location for these species and neither should be considered. Rather, the DEIS should consider the impact of development on least bittern and least tern, both threatened species in New York State found regularly in the area. The DEIS should also consider impacts upon other species of special concern such as American bittern, osprey, sharp-shinned and cooper's hawks, each of which is regularly identified in the area.

The DEIS is disingenuous when it states that "the proposed project would not have any significant adverse impacts to natural resources in the area. Enhancing freshwater and tidal wetland areas may improve water quality and flood protection and storage."

This proposal for the development of South Avenue Retail should be denied by Department of City Planning because the proposal moves beyond the agreements of the Stipulation of Settlement, because of the creation of an unexplainable cul-de-sac and because of the impact to the natural resources of the immediate area.

Respectfully submitted,



Clifford Hagen

President

Protectors of Pine Oak Woods

PO Box 140747

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July 14, 2017

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Clifford Hagen

President

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Respectfully submitted,



Clifford Hagen

President

Protectors of Pine Oak Woods

PO Box 140747

Staten Island, New York 10314

August 7, 2017

Honorable Mr. Robert Dobruskin
Chief of Environmental Review NYC Planning Dept. Environmental Review Unit.

RE: South Ave. Retail ULURP 030R Draft Environmental Impact Statement Opposition to proposed De-mapping of city streets for retail Center at 534 South Ave. Block 1707, Lots 1 and 5

The Granitville Swamp / Woodlands is a 28 acre natural landscape located in close proximity to the intersection of South Avenue and Forest Avenue on Staten Island. The land is relatively flat, only a few feet above sea level consisting of 10 acres of fragile Wetlands and 18 acres of Woodlands. This natural habitat supports a rich variety of Flora and Fauna. Some of the wild animal life which depends on this ecosystem for survival are turtles, deer, skunks, opossums, raccoons, ducks, snakes, egrets, squirrels, hawks, blue jays, cardinals, muskrats, etc. A multitude of insects and reptiles including dragonflies thrive in the rich Swamp and adjoining Woodlands. The entire 28 acres is an interconnected and co-dependent environment which must be preserved for perpetuate. Destruction of the Woodlands would adversely effect the Wetlands. There should not be a line drawn on a map determining what will be spared and what is destroyed. The delicate balance of nature which has existed for over a hundred plus years must be maintained to ensure a healthy natural ecosystem.

The Environmental Impact Study for the BJ Store project is flawed. There are several errors which other concerned citizens reported in their letters. One obvious error is the 24 hour rainfall statistic. It's grossly underrated. In August 2011, Staten Island experienced a rainfall of 8 inches in 24 hours. Hurricanes can release large volumes of water causing flooding and even death. It takes just one major storm to cause a disaster.

In recent years storms are releasing more rainfall than in the past as the climate is changing. From 1894 to 1994 , an econometrics project I completed indicated that NYC experienced nearly a two degree Fahrenheit increase in temperature. The Earth is naturally getting warmer due to the slight change in the tilt of the axis, sunspot activity and El Niño's. Since 1994 the climate has become warmer. NOAA determined that 2014 was the warmest year on record. Warmer weather means an increase in ocean temperature resulting in more violent storms.

Preservation of Wetlands and adjoining Woodlands is a natural way for the environment to handle the excessive rainfall. Destroying 18 acres of trees will raise the Water Table and during heavy rainstorms flooding is a serious and dangerous problem. Nearby homes which are adjacent to the project area will be in jeopardy. The construction of infrastructure projects in an attempt to prevent flooding will be expensive. If the entire 28 acres remains in its natural state there is no need for the expensive infrastructure projects.

Costs will increase for the thousands of nearby homeowners as Flood Insurance rates go up or become mandatory. Without the trees to help absorb the rainfall, the water runoff will enter the Combined Sanitary and Storm Water Sewage System. During a major storm the flow of over a 100 MGD will be sent via gravity and by Pumping Stations through the underground distribution system to the Port Richmond Waste Water Treatment Plant. Under normal Dry Weather Flow this facility can adequately treat the raw sewage meeting Federal and State strict guidelines before discharging the effluent into the Kill Van Kull.

The waterway separating this part of Staten Island with New Jersey is the Kill Van Kull which is about one mile away from the planned site of the BJ Store. During Hurricane Sandy the tides rose about five feet above sea level causing flooding in the area. Damage could have been much worse if the 18 acres of trees were not in place to help absorb some of the excess storm water.

During severe storms the Port Richmond Wastewater Treatment Plant will implement Wet Weather Operations, at double its normal capacity. The Treatment Plant receives combined sanitary and storm water flow. A flow over 90 million gallons daily will be by-passed from the normal Primary and Secondary Treatment Process. Only Primary Treatment will be implemented due to the limited capacity during Wet Weather Operations. Only some minor settling of solids and the increase dosage of Hypo-chlorine will be applied in an attempt to treat the sewage.

By-passing the total treatment process will result in pollution being discharged into the Kill Van Kull. Any Wastewater entering the plant during severe storms is By-passed because the flow entering the facility exceeds the maximum capacity to treat the raw sewage. The SPEDES Permits can be violated and the city must pay an excessive fine.

Why spend a fortune on expanding any Wastewater infrastructure which is expensive to build and maintain? Why not protect and preserve the natural ecosystem currently in place at the proposed site of the BJ Store project? In the long run it will save the city money and alleviate local area residents concerns about flooding. It will also provide a natural protected preserve for the people to enjoy.

Another flaw in the Environmental Report is the Native American archeological survey. Numerous sites of Native American occupation have been discovered in Granitville and Mariners Harbor virtually surrounding the proposed location for the BJ Store. It is almost certain that Native Americans occupied the 18 acre of Woodlands which is planned to be destroyed. Recently, only two thirds of a mile away, a very rare Native American site was discovered near Gulf Avenue during the excavation for a Gas Pipeline. The site was occupied for 10,000 years. A treasure trove of artifacts were discovered and categorized. Part of the collection is on display in the Staten Island Museum. None of this information is in the chapter devoted to Archeology in the Environmental Statement Report.

An additional benefit of retaining the current ecological environment would be the creation of a natural managed preserve for the thousands of local area residents to enjoy and improve the Quality of their Lives. The children from these poorer neighborhoods deserve the same consideration as the kids growing up in more affluent neighborhoods. Many residents are newcomers to America and lack the knowledge about the benefits of preserving nature and creating Parkland. This ethnically diverse population should not be taken advantage of but instead be given the same opportunity to live near Woodlands that currently exists that can be created into a protected managed preserve.

Staten Island is only about 59 square miles and has a population estimated in 2016 of 478,000 people. Natural landscape is very sparse so it would be a crime to destroy 18 acres of rare Woodlands. We need a healthy balance between growth and preservation, not overdevelopment.

The citizens who are aware of the plans and determination by a Builder to destroy this rare natural landscape are very angry and disgusted by the lack of disregard to the thousands of people who reside in the two nearby communities. There is a general feeling among the local residents of being treated as second class citizens. Area residents feel the city is interested in gaining a few more tax dollars, rather than trying to preserve the priceless acreage, that is the last of very few remaining parcels of natural landscape on the North Shore of Staten Island.

Traditionally for the past few decades Staten Island has been a Tale of Two City's. Many areas and neighborhoods of the North Shore were never treated as equals with the rest of the island. The Department of Environmental Protection, where I am employed as a Deputy Plant Chief, had enacted a brilliant program called the Blue Belt to preserve, manage and protect Wetlands including surrounding Woodlands throughout the South Shore of Staten Island. The same Blue Belt plan should have been aggressively pursued on the North Shore but was not enacted until fairly recently. Much

natural acreage was destroyed by Builders at the expense of the environment and to the dismay of residents witnessing rampant overdevelopment and an accelerated increase in population.

The two nearby communities adjacent to the Granitville Swamp / Woodlands is Granitville and Mariners Harbor. The population is ethnically diverse and household incomes including education levels tend to be lower than the population residing on the South Shore. Nearly 75% of the combined population of nearly 20,000 people are Black and Hispanic. Almost 10% is Asian and about 15% is White. On the South Shore the White population can number 80% or greater with only 3% Black.

Why bother to bring up these statistics? The city and state governments through the DEP and DEC acted quickly and decisively to protect and preserve the fragile Wetlands and Woodlands creating a healthy balanced ecosystem which is thriving today. Wildlife is flourishing and a pair of rare Bald Eagles have nested and raised two healthy offspring this breeding season. This was made possible because the habitat was saved and the city Wastewater Treatment Plants are cleaning up the harbor to such an extent that sea life have returned. Animals like Seals, Whales and Eagles not seen in this area for 150 years have now returned because their food source is once again thriving due to the preservation of Woodlands, Wetlands and cleaner Harbors.

In 1970, the waters were so polluted very little aquatic life survived. The Bald Eagles, once extremely rare in NYS, is an apex hunter on the food chain. It's surviving today on the South Shore of Staten Island because some Civil Service Workers employed in the DEP understood that a community needs a balance between growth and nature. A few decades ago the Blue Belt Project was enacted throughout the South Shore as privately owned land was purchased by the city to create a lush vibrant ecosystem. The Department of Environmental Conservation with state funds purchased as a natural preserve Mount Loretto from the Archdiocese. Today the adults and especially the children residing throughout the South Shore live in close proximity to nature and have easy accessibility to enjoy the Wetlands and Woodlands. On the North Shore it's a very different story. For many years the city and state neglected the people crowded into densely populated neighborhoods exposed to pollution carried by the winds easterly across their neighborhoods from the chemical plants and oil refineries in near-by New Jersey.

Limited amount of trees and lack of Open Green Spaces were not sufficient enough to help reduce the health issues caused by the air pollution. This was a major factor causing a multitude of respiratory problems, especially in the elderly and the very young. Childhood Asthma is not uncommon in the very young residing on the North Shore. Destroying an additional 18 acres of trees will only increase health problems for local residents. Trees are extremely important to help combat pollution. Destroying the few remaining trees to build a BJ Store or any store is wrong and irresponsible.

The thousands of children living in Grantville and Mariners Harbor, have the right to live in a healthy environment. The Department of City Planning and City Hall must understand the consequences of placing a higher value on the destruction of these critical Woodlands by wanting to build a store, over the needs and quality of Life of these children who are from a poorer economic status. The children from Granitville and Mariners Harbor deserve to live close to a natural landscape with easy access. They should also be offered the right to enjoy the trees, wildlife and experience nature just as other children living on Staten Island.

The citizens are not against having a BJ Store but not in favor of having it at this location. (Staten Island cannot afford to experience unnecessarily another rare few acres of Woodlands being destroyed. We will not permit another Mount Manresa to occur and that tragedy happened because the community was deceived by the owners including an elected official who was working secretly helping the Builder purchase the beautiful pristine landscape containing thousands of trees, a few pre-dating the Revolutionary War. The Builder spitefully destroyed all the trees despite very strong community opposition. This 15 acre rare natural landscape was also in a North Shore neighborhood plagued with pollution and overdevelopment issues.

The members of Community Board 1, voted against De-mapping the streets in an effort to prevent the construction of a BJ Store which is very unpopular with the community. We live in a republic and the representatives of the people voted against De mapping. A Builder and a few others will reap obscene profits destroying 18 acres of trees in a fragile rare ecosystem at the expense of thousands of tax paying residents. Over-development has been the order of business throughout the North Shore. The price of the combined 28 acres of Wetlands and Woodlands is \$9 million, which is the purchase price of some Manhattan Condos. If common sense prevails than the city and state governments will collectively purchase the land from the owner to maintain a natural buffer against flooding and provide a protected Woodland / Wetland preserve for the people of the North Shore Community of Staten Island.

Best regards, Jack Bolembach

Deputy Plant Chief, NYC DEP Chairman City Engineers Division Local 3, IBEW

Cc: Governor Andrew Cuomo; Mayor Bill deBlasio; mlag@planning.nyc.gov; lgarcia@planning.nyc.gov; lcrosby@cb.nyc.gov; drose@council.nyc.gov; joddo@stateniland.usa.com; SMatteo@council.nyc.gov; djsavino@aol.com; Nicole Malliotakis NYSAssembly60@gmail.com; ABarnes1@cityhall.nyc.gov; lanza@senate.state.ny.us; CusickM@assembly.stateny.us; TitoneM@assembly.state.ny.us;

From: "Linda Cohen" <lindashoob@aol.com>
To: "Robert Dobruskin (DCP)" <RDOBRUS@planning.nyc.gov>
Cc: "James Oddo" <joddo@statenilandusa.com>, "Deborah Rose" <drose@council.nyc.gov>, "chagen72@gmail.com" <chagen72@gmail.com>, "NRPA2@aol.com" <NRPA2@aol.com>, "marathon92@aol.com" <marathon92@aol.com>, "Len Garcia-Duran (DCP)" <LGARCIA@planning.nyc.gov>, "SaintPraxedisRCC@gmail.com" <SaintPraxedisRCC@gmail.com>, "bsanche@yahoo.com" <bsanche@yahoo.com>, "nswcsibt@aol.com" <nswcsibt@aol.com>
Subject: Comments on South Ave Retail DEIS

To all concerned,

Regarding the South Ave. Retail project, I am opposed to the demapping for the South Ave. Retail development primarily because of concerns of flooding. The lessons of Super storm Sandy and the death and destruction that Staten Islanders experienced should be considered when evaluating this project.

The thousand folks living across the street from the project site were largely spared from the major destruction of Sandy. According to many in the community, and many of the comments that I have read, the reason was that Graniteville Woods contained the flooding and the trees and soil absorbed the water. Residents say that there was heavy flooding in Graniteville swamp, but that it did not cross South Ave. Several experts have stated that the Storm water Retention Basins, included in this project, cannot duplicate the functioning protections that Mother Earth had provided to this community within the acres of Graniteville woods.

The articles attached above are of rallies of hundreds of concerned citizens that took place in Great Kills, Staten Island in 2000. While there are obvious differences in the Great Kills project and this South Ave project, the similarities are important.

Many of those who attended the Great Kills rallies spoke against a project to build hundreds of new homes on land that was needed for its' ability to absorb flood waters. Many stated that the land involved was like a bowl that had already experienced severe and destructive flooding.

The concerns of the community were largely ignored. If memory serves me well, the SI Borough President at the time voted in favor of the project, and all members of the City Planning Commission voted in favor of the project, except for a single abstention from SI Rep. Fred Cerullo. As a result, the new homes went up despite continued community opposition.

According to the SI Advance, of the many folks who drowned during Sandy, were Marie Colborne, and her husband, Walter. It was reported that they were found in woods at the intersection of Tennyson Drive and Nelson Avenue. To community survivors, it appeared that the waters from the shore and well as from neighboring streets had funneled into this area, as the concerned residents had predicted. It was also reported, that during the storm, the new homes, which had been built on fill, withstood the storm. However, this was at the expense of the existing older homes, many of which were destroyed.

Survivors who witnessed Sandy destruction often mention that the water was coming from all directions, looking for a place to go. This issue of water displacement during flooding has not been addressed adequately. The following excellent articles from the Huffington Post are important in that they help explain why Staten Island, in particular, had so much death and destruction during Superstorm Sandy.

The interviews with Sandy survivors and neighborhood protectors delve into the issue of water

displacement, as well as the roles that politics and profit played in the effects of Sandy.

[http://www.huffingtonpost.com/2012/12/17/staten-island-hurricane-sandy_n_2300793.html?](http://www.huffingtonpost.com/2012/12/17/staten-island-hurricane-sandy_n_2300793.html?utm_hp_ref=email_share)

[utm_hp_ref=email_share](http://www.huffingtonpost.com/2012/12/17/staten-island-hurricane-sandy_n_2300793.html?utm_hp_ref=email_share)

http://www.huffingtonpost.com/2012/12/06/staten-island-hurricane-sandy_n_2245523.html

http://www.huffingtonpost.com/2012/11/12/hurricane-sandy-damage_n_2114525.html

We are approaching the 5 year anniversary of Sandy. Originally, building was prohibited on Graniteville Woods. Upon the owner' s appeal, the Freshwater Wetland Appeals Board made their decision to allow the owner to build in these woods. That was June 2012, a few months before Superstorm Sandy struck. After the destruction of Sandy, NYC officials promised to lower our flooding risk and mitigate the impact of climate change. How does removing 1700 mature trees and cementing over acres of land in this coastal zone fit into that promise?

Linda Cohen

From: Danny Gold [<mailto:dannygold05@gmail.com>]
Sent: Monday, July 17, 2017 8:04 AM
To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Cc: Len Garcia-Duran (DCP) <LGARCIA@planning.nyc.gov>; Deborah Rose <drose@council.nyc.gov>; James Oddo <joddo@statenisdusa.com>; savino@senate.state.ny.us; cusickm@assembly.state.ny.us
Subject: Staten Island South Avenue Retail Space

I reviewed the Staten Island South Avenue Retail Space DEIS and the writeup didn't address many key points that I discovered in my research on the property.

Here are the major issues that the DEIS didn't address:

- Graniteville Swamp is headwaters for Old Place Creek as well as crucial to maintain stable water levels at Goethals Bridge Pond
- Stable water levels at Goethals Bridge Pond is needed to support wildlife (The Harbor Herons Report - 1990)
- US Fish & Wildlife Service cited Graniteville Swamp as significant foraging area for the Harbor Herons
- NYC Department of City Planning highlighted the importance of the site for migrating songbirds
- HEP placed Graniteville Swamp on its Priority List for Acquisition
- The Regional Advisory Committee for the New York State Open Space Conservation Plan recognized Graniteville Swamp as a NYC Land Protection Priority
- The Graniteville Swamp must be given the highest, perhaps the first priority in the Harbor Herons complex (The Harbor Herons Report - 1990)
- Graniteville Swamp performs important storage services for nearby communities (as evidenced by its preventing Sandy from flooding nearby communities) and its loss would force major new sewer investments by NYC
- Today, Graniteville Swamp provides major nature trails through its woods

All these issues need to be addressed before any approval is granted.

Please forward my comments to the NYC Planning Commissioners in time for the July 26 Hearing. I'm also concerned that the public hearing on this crucial issue is scheduled during a time when most people are on vacation.

Danny Gold

Submitted by:

Name: **Danny Gold**

Zip: **10310**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

I reviewed the Staten Island South Avenue Retail Space The DEIS and the writeup didn't address many key points that I discovered in my research on the property. Here are the major issues that the DEIS didn't address: - Graniteville Swamp is headwaters for Old Place Creek as well as crucial to maintain stable water levels at Goethals Bridge Pond - Stable water levels at Goethals Bridge Pond is needed to support wildlife (The Harbor Herons Report - 1990) - US Fish & Wildlife Service cited Graniteville Swamp as significant foraging area for the Harbor Herons - NYC Department of City Planning highlighted the importance of the site for migrating songbirds - HEP placed Graniteville Swamp on its Priority List for Acquisition - The Regional Advisory Committee for the New York State Open Space Conservation Plan recognized Graniteville Swamp as a NYC Land Protection Priority - The Graniteville Swamp must be given the highest, perhaps the first priority in the Harbor Herons complex (The Harbor Herons Report - 1990) - Graniteville Swamp performs important storage services for nearby communities (as evidenced by its preventing Sandy from flooding nearby communities) and its loss would force major new sewer investments by NYC - Today, Graniteville Swamp provides major nature trails through its woods All these issues need to be addressed before any approval is granted. I'm also concerned that the public hearing on this crucial issue is scheduled during a time when most people are on vacation.

Submitted by:

Name: **Maria Mancuso**

Zip: **10303-1783**

I represent:

- **Myself**

Details for "I Represent": **Myself**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

I reside in City West condominiums at 76 Wolkoff Lane. I am a retiree. I am opposed to this project because of the increased flood risk the incremental filling in of the wetlands across from me on South Avenue represents. Furthermore, I do not have a car and must take public transportation to get around the community. The increased traffic on South and Forest Avenues will make my walking across the streets even more dangerous than it already is now.

From: Don Recklies [donrecklies@earthlink.net]

Sent: Monday, August 07, 2017 14:21

To: Olga Abinader (DCP)

Subject: South Avenue Retail Development ULURP 160174 ZSR, 150359 MMR 17 DCP 030R.

Dear Ms. Abinader,

I understand that Mr. Dobruskin is out of the office and can't respond to this message, but I believe that this is the last day to file comments on this matter. Would you please handle my comments below where they can be part of the record and viewed by the planning commissioners. I have also attached them in pdf and rtf formats.

Thank you.

Donald Recklies

To: Honorable Commissioners of the City Planning Commission

To: Mr. Robert Dobruskin

NYC Planning Dept.

Environmental Review Unit

South Ave Retail

August 7, 2017

Dear Commissioners:

I write in opposition to the proposed retail development at the corner of South Avenue and Forest Avenue, ULURP 160174 ZSR, 150359 MMR 17 DCP 030R.

The value of wetlands for storm protection is no longer contested, and it is generally recognized that by filling and developing wetland areas we have made ourselves more vulnerable to storm damage. The estimates are that in the past 100 years over 85% of the existing wetlands of the NY/NJ estuary have been lost, primarily to development. The ability of wetlands on the west shore of Staten Island to sustain storm surges continues to be compromised. For instance, the development of the former "NASCAR" site by further raising and hard surfacing what was in former years a marsh insures that more water will runoff into a smaller and smaller area of marsh able to absorb and mediate it, yet is precisely the presence of the west shore wetlands that tempered the results of super-storm Sandy.

At the public meeting July 26, 2017 the applicant's team maintained that there would be no impact to the ability of the area to manage storm water, and that facilities were planned to contain 100% of that water. No mention was made about what severity of storm was anticipated to create that 100% of water. Sandy has been variously described as a "100 year" storm or a "300 year" storm, but no matter what description you certainly are aware that another storm of equal or greater severity may strike this area this year or next. We all know that "per 100 years" is an average, not a prediction of when the next will strike; we also know that Sandy, which caused so much damage on Staten Island, was not an exceedingly intense storm itself, but unfortunately struck the mainland at an exceptionally damaging angle. The storm surge which came as far as the edge of South Avenue needed only slightly higher winds to come much further.

Without the interposition of the Graniteville Swamp and the marshes of Old Place Creek it would have been much worse for all those living on the east side of South Avenue. Not only did the 28 acres threatened by this project absorb and retard their part of the rising water, the trees growing on the interspersed slightly higher land did their part in tempering the winds at ground level (as well as doing their part as a carbon sink and as a key part in the increasingly diminishing forest ecosystems of Staten Island). If this development is allowed to proceed, when the next similar storm occurs the home-owners there will rue the loss of this lonely band of trees that alone separates them from waters to the west.

I will not attempt to convince you of the value of this land as part of the natural ecosystem; many of you will already have made your mind up about ecological value of the site as opposed to its economic value. I do, however, question the amount of economic value and the need for retail development here considering that there are a number of retail developments, some of them struggling, close by. And I especially question the advisability of permitting another gas station to be sited so close to Graniteville Swamp; despite precautions leakage and petroleum run-off into that sensitive area will occur. Furthermore, the traffic study in the DEIS does not seem to adequately consider the impact on local residents of increased commercial traffic, especially from the Goethals Bridge and Staten Island Expressway, at the intersection of South Avenue and Forest Avenue.

Please consider that the long term impact of proposed development in this flood-prone area is likely to have deleterious effects that will offset its short-term, limited economic gain. There are better sites on Staten Island, especially those sites that may be remediated or reused than the site of this healthy, existing swamp forest.

Thank you for considering my comments.

Sincerely,

Donald F. Recklies

To : Honorable Commissioners of the City Planning Commission
To : Mr Robert Dobruskin
NYC Planning Dept
Environmental Review Unit
South Ave Retail

August 7, 2017

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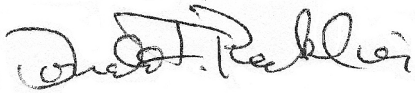
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Furthermore, the traffic study in the DEIS does not seem to adequately consider the impact on local residents of increased commercial traffic, especially from the Goethal's Bridge and Staten Island Expressway, at the intersection of South Avenue and Forest Avenue.

Please consider that the long term impact of proposed development in this flood-prone area is likely to have deleterious effects that will offset its short-term, limited economic gain. There are better sites on Staten Island, especially those sites that may be remediated or reused than the site of this healthy, existing swamp forest.

Thank you for considering my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald F. Recklies". The signature is written in a cursive style with a large, prominent initial "D".

Donald F. Recklies

Submitted by:

Name: **Elizabeth Szczepanski**

Zip: **10303-1783**

I represent:

- **Myself**

Details for "I Represent": **Myself & my safety concerns**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

I am a 73 year old female retiree and own/live at City West Condominiums. I do not know how to swim. Our community (206 families) is across from South Avenue and is at risk with flood due to this project. I oppose all development in the wetlands surrounding my community as it increases our flood risk as storm surge and water storage capacity is diminished. The flood risk increases as a project is implemented in the wetlands buffering our community. The financial risk is devastating as a major flood will result in financial ruin of our condominium and the dissolution of our condominiums are an ongoing enterprise. I am requesting that a moratorium be placed on all wetlands development on the Staten Island north shore. I believe it is in the best interest of our community that NY State/City purchase the available wetlands Buffers to protect residents, properties & businesses on a permanent basis.

Rev. Gabriella Velardi Ward
40 Wolkoff Lane
Staten Island, NY 10303
August 4, 2017

Honorable Commissioners

Mr. Robert Dobruskin
NYC Planning Dept.
Environmental Review Unit

Re: South Ave Retail
ULURP 160174 ZSR, 150359 MMR
17 DCP 030R
Draft Environmental Impact
Statement

Gentlepeople,

I am a resident of City West, a condominium community directly across South Avenue from the proposed project and just north of the Staten Island Expressway. I am also a recent retiree from the NYC Department of Parks and Recreation (DPR), having worked as an architect in Capital Projects Design and Construction Divisions for 23 years. Eight of those years were in Staten Island Construction. I am very familiar with open green spaces on Staten Island and where they are located. I am opposed to the proposed project, the construction of BJs and gas station on the Graniteville “Swamp”/Salt Marsh and Forest as well as to any other commercial use of that land.

As an architect and Resident Engineer, I have seen three forests cut down in the last few years. Two were Park properties and the third, the forest around the former Mount Manresa Retreat House. How many more forests can Staten Island afford to lose without devastating effects, some of which we have already seen.

If the forests on the Eastern shoreline remained during the last severe hurricane, they would have buffered the rising waters of Hurricane Sandy. And perhaps there would not have been the kind of destruction we witnessed as well as the tragic loss of life. I know of the destruction first hand. My construction site was on Midland Beach. I was there that morning as well as the following days after the storm. I will never forget the eerie sounds and terrible smells of those days. And Hurricane Sandy was only a Category one (1) hurricane.

We are living in the days of Climate Change. There will be more and higher category storms in the near future. Will we Staten Islanders learn the lesson of the eastern shore and protect the natural buffers, the wetlands and forests of the western shore that will ultimately protect us if they are not destroyed.

The following are my responses, made as a neighbor who lives across the street from this project and who will be greatly impacted by it. I also make these responses as an architect who spent a great deal of time in the natural environment of Staten Island and who knows much about sustainability. As an architect, I represented DPR at the Mayor's Office of Construction for Sustainable Construction. This group was formulating policy for sustainability for New York City public projects. It is unfortunate that the private sector has not been made to take seriously, respect for the health of the community in which they build, respect for the severity of climate change and the damage it is already causing locally as well as globally and respect for the dangers in which they leave the community after their construction projects are complete and they return to their homes. It is also very sad to me that the private sector does not consider the effects of their work "to the seventh generation" as our indigenous sisters and brothers do.

Flooding: Salt Marshes absorb a great deal of water during hurricanes and other types of storms. The Graniteville "Swamp"/salt marsh is no exception. During hurricane Sandy the residents around this salt marsh were protected from flooding. The stores and residents further south on South Avenue were not so lucky. That portion of the wetland system was filled in and the stores and homes were flooded. If our community's current standing regarding flooding events is changed and we become a flood zone because of this project, we will be subject to evacuation and our belongings, including pets, may be subject to destruction.

Forests, such as that just north of the salt marsh and part of the same parcel of land, also absorb water. As Vandana Shiva, Asian Indian scholar and environmental activist, said, "the product of forests is not wood. The product of forests is water". Forests hold a great deal of water.

Forests also provide cooling temperatures for the surrounding areas and absorb carbon dioxide emissions from passing cars. Since South Avenue is a major thru fare from New Jersey to the Staten Island Ferry, and since the Staten Island Expressway is only a very short distance away, this forest is highly important for the physical health of the community by absorbing emissions.

Flood Insurance: If the community loses this "swamp" and then becomes a flood plain, residents will be forced to buy flood insurance. In their report, the developers have acknowledged that they may be able to protect the area from flooding, temporarily. The developers only consider hundred year storms but since we are now well into Climate Change, thousand year storms are common. Hundred year storms should no longer be the standard.

The condominium associations of City West and Regal Walk, which are both across the street, will have a choice of either passing on the cost of the Association's flood insurance to the home owners and renters, in the form of maintenance fees, in which case owners and renters will be hit twice financially, once for their interior insurance and once in the form of higher maintenance fees. The demographic for City West is very diverse and we do have a sizable number of people of color, of poor struggling to survive and of working class struggling to maintain their standard of living. They are also of diverse age and (dis)ability.

This increased cost will probably mean an increase in default on the home owners' and renters' maintenance fees. This, along with the increased cost to the Association for community flood insurance will translate into a high probability of bankruptcy of the Associations. The currently stable Associations will descend into chaos.

Traffic: Currently, there is tremendous congestion around our condo communities, especially during rush hours and at major holidays. I use the Sunoco gas station at the corner of South Avenue and Goethals Road North. At times it is extremely difficult to exit onto South Avenue, especially turning north. It is so dangerous that I and others I know take the very long way around exiting onto Goethals Road North, turning onto Forest Avenue and then onto South Avenue just to get onto my block, just across the street from the gas station and salt marsh. In addition, it is difficult to near impossible to exit these condo communities by car onto South Avenue and Lisk Avenue due to road congestion.

Trucks, 16 wheelers and others use Goethals Road North and generally turn left or right onto South Avenue. A few years ago, a 13 year old girl was hit and killed, by a truck, shortly after school was let out, as she was trying to catch a bus on South Avenue. Her school is only two blocks away from South Avenue and is on Goethals Road North. With this project, will come increased congestion, increased risk of injury or death of children, disabled and the elderly. Is this risk worth the profit this project will bring the developers?

Some drivers, especially during rush hours, cut into Wolkoff Lane, where I live, and which is private property, in order to save time by skipping several signal lights on South Avenue. They speed and go around speed bumps to make time. I have to accompany my grandchildren onto the Lane in front of my house, during those hours. What will happen to our communities if this project goes through?

Economics: As was stated above, because of the economic situation of many of the residents, an additional and substantial bill for flood insurance will be a burden to many. Why is it that the vulnerable are the ones who are put in this position so the wealthy can make a profit?

Added jobs and tax revenue: Existing store owners along Forest Avenue are concerned about not being able to compete with the prices that a BJs store and gas station will bring. If BJs puts many existing businesses out of business, what happens to the tax base? And if that doesn't happen and there is an increase of the tax base, how much of that tax base will be spent in this neighborhood?

In addition the majority of the money made at BJs will not remain in the neighborhood, will not circulate here and will leave the communities surrounding this project in worse shape than they are currently. If minimum wage is paid to the workers, they and their families will not be able to live here and that money will also leave the surrounding communities.

Health effects: With increased automotive congestion, comes increased CO2 pollution, especially since more than 1800 trees will be cut down to make way for this project. Without the

forest to absorb the CO₂, we may be looking at an increased incidence of respiratory and other illnesses. As it is, the residents are now coping with pollution from the S.I. Expressway, from Newark Airport and from the refineries across the Goethals Bridge. There is a high incidence of cancer in this area already. If this proposal to fill in the salt marsh and cut down the forest passes, I see this as environmental racism and classism and it will result in a health crises.

Noise pollution: The nearby communities already have their share of noise pollution coming from the airport, the expressway and trucks along South Avenue and Goethals Road North. Add to that increased congestion from delivery trucks, especially during holidays, and the noise level will be unbearable, especially for those living along South Avenue.

Environmental concerns: With the addition of a second gas station with its attendant supply of pipes and the danger of spills and leaks, the ground water in this area will be contaminated. Salt marshes are fed by streams. That pollution will move down stream and will pollute additional areas.

Salt marshes are one of the most productive pieces of land on the earth. That is where fish spawn, where birds nest and where diversity of the natural world thrives. If this project goes through, this will be one more place where animals cannot be. We humans are now responsible for the 6th greatest extinction of species on earth. Certainly this is due to pollution of the oceans and rivers and streams. It is also due to the elimination of natural habitats for these species. When is enough, enough?

I received my architecture degree from Pratt Institute in Brooklyn in 1989. One of the courses I took was Urban Development. A developer came to speak to the class. He was proud to tell us how he bought a piece of farm land and had it changed to allow him to build condominiums. And he made lots of money. I said to him, this sounds like manifest destiny of the developer and what happens when we come to the end of the land. He said to the class and to the professor, by that time, you and I won't be around and after that who cares! Is that what is going on here? Who cares? Who cares about the future of our children and grandchildren? Who cares about the health of our communities? Who cares about the future of the planet?

Let us understand that what we are discussing is the destruction of an eco-system, a swamp (wetlands) and forest, a system that is self-regulating without the interference of humans. With its destruction, and the destruction of systems like it, we will eventually come to the destruction of human life. We are well on our way now. It is important to stop destroying our environment and start protecting it.

The project will take up more than half of the existing salt marsh. If that does not include the buffer zone, there will be practically nothing left of the salt marsh. If it does include the buffer zone there will not be enough of the salt marsh left to make a difference.

The developer's report states that it takes 11 hours of rainfall to accumulate one inch. That is no longer true. With climate change, much of our rainfall is now driving rain which is no longer productive because it is not being absorbed by plant matter including trees, especially if there is no longer undergrowth around the trees.

The plan to remove water from the site in the developers report does not seem to be adequate. I would like to know what is the capacity of the proposed retention basins and if they are adequate to hold the water from this new type of storm. I'd also like to know their location. Will they interfere with the functioning of the remaining salt marsh? I'd also like to know where the overflow goes and who is living near there?

Open/green space: There is **no open green space in this neighborhood**, except for the salt marsh and forest. There are no green parks here. The children in this area do not have the opportunity to learn about nature first hand. They are not able to go into a green park and smell the sweet smells of a forest or hear the rustling of the leaves in the breeze. If they do not fall in love with nature as children, they will not protect it as adults. If we have any hope of reversing or stopping climate change, children must love nature. Teens in this neighborhood are equally disadvantaged. The only place for them to go is the school yard on Goethals Road North. They hang out in the evenings and are perceived as a problem. But if there are no activities for them, there will be problems.

If anything were to be built on this land, I would suggest constructing a small nature center, with educational programs to teach the importance of protecting the natural world and classes on how do so. There could be trails in the forest identifying the flora and fauna. And there could be art and photography classes on how to photograph nature. There is such an abundance of wild life in this salt marsh that creating a nature center here would be one way to teach children and others how to respect and protect it's the flora and fauna.

Where will the animals go? There are animals in the wetland and in the forest. We residents of City West are already familiar with the possums, skunks, raccoons, doves and many other species of birds as well as the occasional deer that visit our community.

If they are driven out of the forest because there is construction, will they become a traffic hazard? Will they become a health hazard to people and pets as they become sickly because they no longer have a food source? Why do they not have a right to live where their home has always been? All of this destruction is merely for the sake of profits that will not even stay in our neighborhoods.

I have seen the animals who inhabited the forest at Mont Manresa scatter when the trees were cut down. It was spring. When those trees were falling, the birds flew over the fallen trees screaming. There were nests in those trees and their young were dying. The raccoons in those trees were also dying. Shortly after that destruction two deer jumped onto the Verrazano Bridge. One died immediately and the other had broken legs. Unless we accept the fact that we humans are part of the eco-system we call earth, we also will die. Do we not have children, grandchildren and great grandchildren for whom we wish the best?

Archeology: I have supervised construction sites for DPR where an archeologist was required. Our heritage, those gifts to us from the past, must be protected. I was the Resident Engineer at Jumel Mansion in upper Manhattan. George Washington really did sleep there. It was a high

point and he could see all the way down to Staten Island. I supervised construction at the Dyckman Farmhouse Museum on 204th Street in Manhattan. There was a Hessian hut in the backyard. Both are connected in some way to Staten Island. There is so much history here. Why is it that the public sector has the presence of mind to protect our heritage? Is evidence of our history only for those in other boroughs? Why is it that the private sector can destroy any evidence of history, our heritage, for future generations? Why is it that this can be done in the name of profit? Is profit more important? If the answer is yes, we need to look at who we are as a people.

There should be government regulations to control the discovery of artifacts by the private sector. An archeologist should be required, especially where there is evidence of artifacts nearby. With regard to this developer's report, it has overlooked an important archeological site very near to the Graniteville "Swamp". It is near the Goethals Bridge and the artifacts were protected because it was a public project. The developer's report does indicate some of the archeological sites nearby but leaves out the very significant one near the bridge.

In summary, this project should not proceed. It puts the surrounding community at risk in a multitude of ways. It makes economically vulnerable people responsible for picking up the pieces when harm is done. It will mean one more environmental injustice for the people of color who call this area home. It will destroy historical artifacts that remain hidden in the wetland and forest. And it will put our current economic base at risk. How many more reasons do we need? I say NO!

Sincerely,
Rev. Gabriella Velardi Ward
Architect and priest

CC:
Councilperson Debbie Rose, Borough President James Otto, Mayor de Blasio, Beryl Thurman, Ed Szczepanski, Jill Potter, James Scarcella, John Bolembach, Barbara Sanchez NY1News, Staten Island Advance, Christine Johnson, Len Garcia Duran, Lisa Crosby, Rev. Gabriella Velardi Ward

7/26/17

10 of 7

South Avenue Retail Development Project Opposition - Petition

We the undersigned, as residents of Regal Walk, City West, Southgate, Mariners Harbor, and Graniteville wish to formally go on record as opposed to the construction of the South Avenue Retail Development Project.

It is our belief that this proposed shopping area poses too great a threat to the flood plain of the region. Furthermore, it poses too great an impact on the traffic patterns of the vehicular infrastructure. This offers in exchange too small a window of economic growth when the proposed retail businesses contain their payrolls via low wages with poor growth opportunities. In addition, there exists on Staten Island more than ample retail opportunity for residents to spend their money. We need no more big box retailers especially at the cost of our existing local businesses, major traffic problems, and greatly expanded flood exposures.

Name	Address	Phone #	Signature
Edward Szczepanski	83A Selwin LP, SI, NY	718-982-6410	<i>Edward Szczepanski</i>
Elizabeth Szczepanski	83A Selwin LP, SI, NY	718-982-6410	<i>Elizabeth Szczepanski</i>
E. Booth	46 Wolhoff Lane	718-761-9266	<i>Elizabeth Booth</i>
A. Booth	46 Wolhoff Lane	718-761-9266	<i>Elizabeth Booth</i>
Paul J. McLean	488 A WOLKOFF LANE	718 6986208	<i>Paul J. McLean</i>
John Camp	488 Lisk Ave	718-761-6012	<i>John Camp</i>
Aime Payne	66A Wolkoff Ln	718-760-0720	<i>Aime Payne</i>
David Gardner	66A Wolkoff Ln	718-761-7473	<i>David Gardner</i>
Howard Cohen	490 Lisk Ave		<i>Howard Cohen</i>
<i>[Signature]</i>	402A Lisk Ave	917-573-5872	<i>[Signature]</i>
Vicki Lehre	11 Wolkoff	646-231-1197	<i>Vicki Lehre</i>
Beverly Pedew	490A Lisk Ave	718-310-2663	<i>Beverly Pedew</i>
Maria Morena	76 Wolkoff Ln	718-994-0407	<i>Maria Morena</i>
JOSEPH GUIDONE	19 WOLKOFF LANE	718-819-9768	<i>Joseph Guidone</i>
NATHANIEL PEDREW	490A LISK AVE	718-310-2663	<i>N. Pedrew</i>
Joseph DiSil	19 Wolkoff Lane	718-819-9768	<i>Joseph DiSil</i>
DOREEN E MURPHY	496A LISK AVE	718 953 5658	<i>D. Murphy</i>

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South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
LAUREN COLLINS	48A Wolkoff lane	718-983-7660	[Signature]
John Zelinski	544A LISK Ave	718-614-2452	[Signature]
Robert Pellicano	542A LISK Ave	347-636-0859	[Signature]
Donna Zelinski	544A LISK Ave	646-479-5545	[Signature]
ANITA BIANO	91A SELVIN LOOP	347-825-3050	[Signature]
RUTH NEGROW	89A SELVIN LOOP		[Signature]
LORENZO SAFONT	497 LISK AVE.	1-917-887-4570	[Signature]
Rose Safont	497 LISK Ave	917-921-0336	[Signature]
Alana Javois	400A Lisk Ave	917-848-2370	[Signature]
Paul Javois	400A Lisk Ave	347-400-1917	[Signature]
MIRIA GREENBERG	58 Selvin Loop	917-215-1552	[Signature]
Evelyn DePas	483 Lisk Ave	917-921-5332	[Signature]
George Smith	15 Regal Walk	718-358-2222	[Signature]
William	27 Wolkoff	718-982-2441	[Signature]
Francesca	36A SELVIN Loop	917-838-6476	[Signature]
Jennifer Murenu	514 LISK AVE	718-285-4215	[Signature]
Ramiro Murenu	514 LISK AVE	718-285-4215	[Signature]

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South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
Vivian Ferraro	489 LISK Ave	718370002	Vivian
Tare Barletti	30 A Selun Loop	7183706111	Tare
Mike Barletti	30A Selun Loop	7183706111	Mike
Marie Magna	36A Selun Loop	7184946037	Marie
Lawrence H Reith	27-A Wolkoff Lane	7189009618	Lawrence
Cheryl [unclear]	23 Wolkoff Lane	718370250	Cheryl
KIM ROSS	83 WOLKOFF Ln	718615965	Kim Ross
VANCE COLLINS	48A WOLKOFF LN	7189837660	Vance
LISSETTE COLLINS	48A WOLKOFF LN	7189837660	Lissette
JOHN ALLOCCO	570 LISK Ave	7189831921	John Allocco
Virginia Allen	570 Lisk Ave	11	Virginia Allen
Ajamu Brown	15 Wolkoff Lane	839221-2221	Ajamu
JOSE LOPEZ	528A LISK AVE	7183702723	Jose
Chivian Perez	80A WOLKOFF Ln	7186889595	Chivian
MATTHEW GALLO	80A WOLKOFF Ln	3472562829	Matthew Gallo
Jane Pride	15A Wolkoff Ln	7189821188	Jane Pride
Ben Pride	15A Wolkoff Ln	7189821188	Ben Pride

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South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
Dennis Costantino	85A Selvin Loop	718-701-1766	
Olivia Quinto	"	"	
JOSE CORTIZ	81A SELVIN LOOP	917-885-3804	
EMMA RAMIREZ	81A SELVIN LOOP	11 11	
FABIA MORA	52A SELVIN LOOP	718-993-5207	
GLADYS MORAN	52A SELVIN LOOP	718-993-5207	
	32 Selvin Loop	347-962-1640	
Amikora MEDINA	36 Selvin Loop	(347) 742-2657	
	Linda Quatunzio	(917) 346-1591	
	92 Selvin Loop	917-579-6479	
Dorothy McKinley-Jones	93 SELVIN LOOP	718-673-1741	
Lance Grier	87A Selvin Loop	718-698-3201	
Juan Grier	87A Selvin Loop	917-861-9293	
Cynthia Alvarez	77A Selvin Loop	917-861-9293	
Michael DeBora	78A Selvin Loop	917-861-9297	
Wilfredo Alvarez	78A Selvin Loop	718-620-8127	
Raymond Gonzalez	424A Lisle Ave.	917-656-0524	
	424A Lisle Ave.	646-733-8911	

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South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
Margaretta Hernandez	428 Lisk Ave SStNY 10305		
Stew Doyd	428 Lisk Ave SStNY 10303		
Claudia Torres	428 Lisk Ave ST NY 10303		
ALFRED ALFONZO	68 SELVIN Loop NY 10313		
Osward Camarero	72 SELVIN Loop NY 10303		
Portia Kocuy ntr	58 Selvin Loop NY 10303	832-5225	
Helena Bambino	56 Selvin Loop NY 10303	BRKlyn 718 839 3438	
NICOLE Geroulakis	408 Lisk Ave 10303	347 582 0003	
Theressa Legall	420 Lisk Ave. 10303	78-761-8515	
Wilfredo Alvarez	78 A Selvin Loop.	347 620 8989	
CARMEN Alvarez	78 A Selvin Loop.	347 620 8989	
Mirelly Gonzalez	21A Wolkoff Ln	347-581-6971	
Keylin Gsmalg	21A Wolkoff Ln	646-248-2258	
Alex T Quentun	21A Wolkoff Ln	917 597 9737	
Erica Gonzalez	21A Wolkoff Ln	718-473-4003	
Luis Cerda	21A Wolkoff Ln	917-571-6108	
JOSE LORENZO	97 SILVIN Loop	347-729-5132	

South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
Richard J Velez	50A Wolkoff lane	646-7712171	R. Velez
Alexandra Minucci	50A Wolkoff Lane	347-306-0888	Alexandra Minucci
Christopher Reyes	426A Lisk Ave	646-291-1847	Chris
BERNIE MCGRAVE	56-A Wolkoff LA.	718-698-7241	Bernie McGrave
Lisa Blugh-Willis	546 Lisk Avenue	347 280 4847 718 494 1591	Lisa Blugh-Willis
STEVEN Caban	496 LISK AVE	718 370-0885	Steven Caban
Angella Caban	496 LISK Ave	917-412-6056	Angella Caban
Steven Caban Jr.	496 Lisk Ave	718-370-0885	Steven Caban
David M. Caban	496 Lisk Ave	718-370-0885	David Caban
MARGARET BRANKS	64 WOLF LA	347-422-2876	Margaret Branks
IRIS McMillan	62A Wolkoff lane	917979-0115	Iris McMillan
Kim Seitz	490 LISK AVE		Kim Seitz

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South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
Florentina Poyan	97 Selvin Loop	347-729-8361	Florentina Poyan
Destiny Lorenzana	97 Selvin Loop	917-561-4312	Destiny Lorenzana
Daniel Lorenzana	97 Selvin Loop	97-783-8148	Daniel Lorenzana
Leopoldo	436 Lisk Ave	917-927-7658	Leopoldo
Ruben Maldonado	437-11 Ave	343-38332	Ruben Maldonado
Daniela Garcia	95 Selvin Loop	718-300-0786	Daniela Garcia
G. Contreras	80A Selvin Loop	646-546-7778	G. Contreras
C. MENDOZA	85 Selvin Loop	917-535-4017	C. Mendoza
L. MAYO	436 LISK AVE.	347-2426952	L. Mayo
D. Gross	74 Selvin Loop	347-5521143	D. Gross

South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
Katherine Yougel	12 BENTHAM PI ST. N.Y. 10303	718 981-8798	Katherine Yougel
George Malinowski	884 Richmond ¹⁰³⁰³ AV.	718 442-8214	George Malinowski
JOHN SIEBOLD	82 PATISH AVE ^{ST. I.S.} 10314	718-761-9167	John Siebold
Shirley Galbraith	2081 Victory Blk	718-261-5118	Shirley Galbraith
Peter Antonacci	162 Kirshon Ave 10314	718 992-3321	Peter Antonacci
WAYNE AYE	34 ELIC CT	718-983-8853	Wayne Aye
Susan Couture	344 Katan Ave 10308	718-496-4474	Susan Couture
STEVEN VANPAT	81 Jollo St	347-255-7853	Steven VanPat
Nisa Sweeney	415-1 Willow Rd E S.I.N.Y. 10314	347-205-1181	Nisa Sweeney
JOHN ITSIKIS	73 MONAHAN AVE SE N.Y. 10314	347-703-7571	John Itzikis
ROBERT MATTU	60 ARDMORE AVE. S.I.N.Y. 10314	917-584-1870	Robert Mattu
JOHN MEYER	40 Rumson Rd 10314	917-446-5503	John Meyer
PAUL CORRAO	52 Dickson Pl 10314	718-763-2160	Paul Corrao
ANN TELL	40 Bellman Dr 10314	718-983-1473	Ann Tell
D. Rivera	550 Manor Rd	718-816-2710	D. Rivera
E. Rivera	158 Manula Ave	608-1668-1604 S. Rive	E. Rivera
G. O'Connell	175 Shiel Ave	917-624-3385	G. O'Connell

South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
KATHY ROMANUET	290 Harbor Rd	917 805 6320	[Signature]
NICHOLAS BLAZEJIK	290 Harbor Rd	547 661 5497	[Signature]
MARK BLAZEJIK	290 Harbor Rd	347-661-5497	[Signature]
Lakshman Mathur	302 Harbor rd	347 564 1159	[Signature]
Nykea Whitchard	150 Brabant St	917-607-5799	[Signature]
Margarita Tlatca	344 Harbor Rd	718 472 7450	[Signature]
AZARIE	21 DESTINY COURT	(347) 336-2731	[Signature]
SEGUNDO URUCHIMA	354 HARBOR RD Staten I NY	878-682-1178	[Signature]
Alexandro Hernandez	360 Harbor rd	347-764-5163	[Signature]
Cheryl Wilcox	173 Lockman Ave	347-528-9837	[Signature]
SOHAIL AKRAM	372 HARBOR ROAD	347-798-3523	[Signature]
Rosa Castillo	369 harbor Rd	347 459 5012	[Signature]
LAURA LONGENECKER	365 HARBOR Rd	347 589 5365	[Signature]
ANTHONYE HAME	339 Harbor Road	1-718-442-1722	[Signature]
Arista Phillips	339 Harbor Road	646-589-5352	[Signature]
Jerry Harris	339 Harbor rd	718-818-3542	[Signature]
EPHRAIM ASIBO	339 HARBOR RD	718-524-7085	[Signature]

South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
RAZI TWIZER		646-4237347	
Glean Cicero	↑	(718) 442-5020	
Andrew Cicero	1650 Forest Ave	(718) 442-5020	
Joe Cicero	S.I. NY 10302	(718) 442-5020	
Nicholas Cicero	↓	(718) 442-5020	
Abeige Kirne	1810 Forest Ave 10304	201-396-3045	
B. Moran	1810 Forest Ave 10303	347) 787-4132	
P. Kavistika	1810 forest Ave	347-256-3325	
99 cent store	1756 Forest Ave	718 370-1800	
Exxon gas station	1881 Forest Ave	718-815-6285	
Must Daniel	501 Netherland Ave	718-908-9317	
Shanille	92 Rose cliff road	718-983-2727	
Jose A. Martinez	207 Arlington Pl	718-981-1978	
Sheila Martinez	207 Arlington Pl	718-981-7978	
TENENCE CROFT	162 A CONTINENTAL PL	718-494-7611	
BARBARA KIBBEN	5 VAN HOUTEN	547-958	
Pearl Brooks	17 Giordan Ct SI.	718-419-424	

South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
Cheryl Moller	138 Lake Ave	718-727946	Cheryl Moller
Katie Reyes	116 South Ave		Katie Reyes
Robert E. Pipkins	13 Bayview Pl. N.Y. 10303	347-247-2888	Robert E. Pipkins
JEAN CRISSON	28 MARTINEAU ST		Jean Crisson
RALEIGH Swinton	15 ARLINGTON AVE	718-448-0487	RALEIGH Swinton
Margaret Kimble	323 South Ave, SI NY	718-494-1054	Margaret Kimble
Vincente Taormina	312 Lake Ave	718-981-9429	Vincente Taormina
Giuseppe Taormina	312 Lake Ave	718-981-9429	Giuseppe Taormina
William Morris	15 Benjamin Pl ¹⁰³⁰³	718-4483151	William Morris
BEATRICE FREMPONG	14 NORTHFIELD Av.		Beatrice Frempong
CLARA S. Spelman	30 DORSET ST N Y		Clara S. Spelman
Hector M. Gutierrez	289 LAKEMAN AVE SI N.Y.	718-992-8199	Hector M. Gutierrez
Carroll Ann Labita	51 Madison Ave	718-494-8260	Carroll Ann Labita
JOSEPH A. FERRARO	7 HOWARD CT	718-418-1851	Joseph A. Ferraro
Mildred L. CLARK	57 Macormac Pl.		Mildred Clark
ELIJAH MIGUEL	4 Wenlock Street	646-252-6986	Elijah Miguel
BORIS ZV4	2122 Ford N	696-7665	Boris Zv4

South Avenue Retail Development Project Opposition - Petition

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Name	Address	Phone #	Signature
Pearl Brooks	17 Giordan Ct	718 419 9424	Pearl Brooks
Victoria Gillen	74 WINANT ST	718 576 2473	Victoria Gillen
Claudette Duff	46 Francesca La	917-699-1259	Claudette Duff
MIR ALI	252 ALAKE Ave	718-450-625	MIR ALI
MARIO BRUNO	28 ORANGE Ave	—	MARIO BRUNO
David Lawrence	52 Journey St	646-841-7425	David Lawrence
Kewal Kishan	81 Amador St	1718-761-4688	Kewal Kishan
GORDON	31 ALBERT CT		GORDON
Luis Mercado	1878 Forest Ave	347 525 6961	Luis Mercado
Kuman	1980 Fael Ave		Kuman
Concepcion Acevedo	85 South ave	247-804-9861	Concepcion Acevedo
Kelly Fay	289 Classon Ave	607-239-9386	Kelly Fay
Claire Holmes	47 Ogve non Blvd	845-282-0772	Claire Holmes
SHIVAM SULERIA	45 GAYNOR ST.	646-691-0276	Shivam Suleria
DAVID MILLS	97 LUDWIG LN	718 909 0355	David Mills
Patricia Bostrom	361 Grandview Ave #2C	718-494-3580	Patricia Bostrom
Mark Rios	281 LOCKMAN Ave	917 419 9999	Mark Rios

South Avenue Retail Development Project Opposition - Petition

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Name (PRINT)	Address	Phone #	Signature
Tune Cornett	139 Mariners Dr		<i>[Signature]</i>
Shilla	317 Van name		<i>[Signature]</i>
Giuliana Talarca	39 N H Avenue		<i>[Signature]</i>
Alfonso S. Lopez	32 Le Hart Ave		<i>[Signature]</i>
Barry Bastian	32 Lockman Ave		<i>[Signature]</i>
Anthony Stirling	Ardley Stirling		<i>[Signature]</i>
Carmine DeFazio	2732 Richmond Terr.		<i>[Signature]</i>
Martin Stelling	34 Bush Ave		<i>[Signature]</i>
Joel Marrero	33 Bush Ave		<i>[Signature]</i>
Buddy Brown	32 Bush Ave		<i>[Signature]</i>

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Name	Address	Phone #	Signature
Lisa Milhouse	339 Harbor Rd ^{SI NY} 10363	347 339 4052	Lisa Milhouse
Carolyn Velez	334 Harbor Rd	718 876 9830	Carolyn Velez
Keisha Keyn	331 Harbor Rd	917 561 1308	Keisha Keyn
Cheryl Fisher	331 Harbor Rd	917 557 7435	Cheryl Fisher
Karel Arias	325 HARBOR Rd	646 261 1323	Karel Arias
Luis Gomez	301 Harbor Rd	917-699-9371	Luis Gomez
JOHN E. WALTERS	279 HARBOR Rd	718-876-5228	John E. Walters
Clyde Santos	420 GRANITEVILLE	718-744-2016	Clyde Santos
ERICKSANTIAGO	26 YORK AVENUE	646-542-3226	Erick Santiago

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Name	Address	Phone #	Signature
More Owen	90 BOX 60546 ³⁹ _{N 71039}	7184941857	