



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
SCOTT M. STRINGER

August 29, 2019

Tamara A. Greco  
NYSDEC Region 2 Headquarters  
47-40 21st Street  
Long Island City, NY 11101

Re: Article 24 Freshwater Wetlands Permit for 534 South Ave Staten Island,  
Application ID: 2-6401-00287/0000

Dear Ms. Greco:

I am writing to register my concern relating to the proposed commercial development impacting the Graniteville Swamp wetlands and adjacent habitats. I categorically oppose any development that would compromise Graniteville's thriving wetland ecosystem. By subjecting an area containing regulated wetland-adjacent areas to development—meant to include a strip mall, a gas station and hundreds of parking spaces—the North Shore of Staten Island would be made more vulnerable to coastal storms, less able to contend with storm water runoff, and all the poorer for forfeiting an ecologically unique area of great beauty. I urge the Department of Environmental Conservation to reject permits for the proposed project and to hold a public hearing to solicit further comment by the Staten Island residents that would be impacted by the project.

Wetlands, such as the Graniteville Swamp, are an essential part of New York City's ecosystem. Once a ubiquitous feature of our coastline, an estimated 85 percent of New York-New Jersey Harbor's estuary have been lost in the last century.<sup>1</sup> As a result, the City has lost valuable habitats that can aid in the retention of storm water, prevent coastal soil erosion, and protect against storms. While the developer's application to the City Planning Commission highlights a number of measures, both mandated and voluntary, to mitigate runoff and plant trees, it seems impossible that the development would be able to match the existing biodiversity in the area and all of the benefits it provides to the community.<sup>2</sup>

Indeed, the Graniteville wetlands form an essential part of the City's defenses against rising sea levels and the onslaught of future storms and hurricanes. Homes bordering the Graniteville swamp were largely spared from the devastation wrought by Hurricane Sandy. The swamplands absorbed the force of the winds and waves, providing a natural buffer that helped shield the community from the storm. Across the northeast, it is estimated that coastal wetlands prevented more than \$625 million in direct property damages that might have been caused by the storm – including \$138

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<sup>1</sup> [http://www.nyc.gov/html/planyc2030/downloads/pdf/nyc\\_wetlands\\_strategy.pdf](http://www.nyc.gov/html/planyc2030/downloads/pdf/nyc_wetlands_strategy.pdf)

<sup>2</sup> <https://www1.nyc.gov/assets/planning/download/pdf/about/cpc/160174.pdf>

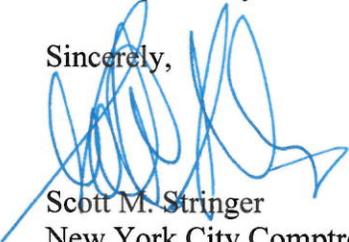
million in potential damages to New York.<sup>3</sup> Areas behind existing salt marshes are likely to have on average 20 percent fewer property damages than areas where salt marshes have been lost to development or mismanagement of natural resources.<sup>4</sup>

Preserving wetlands as a first line of defense against storm surge and flooding is crucial given scientific estimates relating to rising seas and more frequent hurricanes. According to a 2017 paper published in the Proceedings of the National Academy of Science, the likelihood of a Sandy-type storm hitting New York City has increased in the past 200 years from a one-in-500 year event to a one-in-25 year event today.<sup>5</sup> As climate change accelerates and Antarctic ice mass shrinks, storms similar in impact to Sandy could become one-in-five year events as soon as 2030. The area proposed for development sits squarely within the New York City Panel on Climate Change's estimated 2020 100-year-floodmap.<sup>6</sup> The proposed development also borders areas that the Panel has suggested could be susceptible to high tide flooding by the 2050s. The wetlands also perform a vital function in capturing storm water runoff and reducing flood risk associated with heavy rainfall.

I urge the Department of Environmental Conservation to fully weigh the value the Graniteville wetlands contributes to the community in its consideration of the pending permit. Rather than forfeiting our few remaining natural spaces to development, I believe that our City should be acting with urgency to protect Staten Island's wetlands, including considering options such as the purchase of the parcels in question. As I have outlined in a recent report, *Safeguarding Our Shores Protecting New York City's Coastal Communities from Climate Change*, the urgency of climate change demands that we do everything we can to protect our shorefront communities and preserving existing wetlands must be a priority.<sup>7</sup>

I thank you for your consideration of this matter.

Sincerely,



Scott M. Stringer  
New York City Comptroller

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<sup>3</sup> <https://www.nature.com/articles/s41598-017-09269-z> and <https://www.pbs.org/newshour/science/wetlands-stopped-650-million-property-damage-hurricane-sandy-can-help-houston>

<sup>4</sup> <https://coastalresilience.org/coastal-wetlands-provide-significant-flood-damage-reduction/>

<sup>5</sup> <http://www.pnas.org/content/early/2017/10/03/1703568114>

<sup>6</sup> <http://dcp.maps.arcgis.com/apps/webappviewer/index.html?id=1c37d271fba14163bbb520517153d6d5>

<sup>7</sup> <https://comptroller.nyc.gov/reports/safeguarding-our-shores-protecting-new-york-citys-coastal-communities-from-climate-change/>