Testimony of
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Before the New York City Department of City Planning

We appreciate this opportunity to submit testimony to the City Planning Commission on the important issue of the proposed development at the Domino Sugar property. We are happy to see Community Preservation Corporation and Churches United collaborating on this important venture to bring more affordable housing to our community and believe this project offers the opportunity to strike the right balance between affordability and density.

Nevertheless, we are concerned about the proposed density on the site, and its potential impact on both the scale of the Williamsburg community and on community services as a whole. The rezoning plan for this strategic property must balance this concern with the opportunity to create affordable housing on the site, while preserving historic elements where possible.

The bulk of our testimony will address affordable housing since the shortage of affordable housing and the impact of displacement remain overwhelming concerns for the low- and moderate-income residents in Williamsburg/Greenpoint which have borne the brunt of the dislocation resulting from development of luxury housing. Given its size and location, The Domino site offers a unique opportunity to address the affordable housing crisis in our community. We appreciate the intent of the developer to include 30% or 720 of the overall 2,400 units to be affordable.

However, the current proposal raises some additional concerns which should be addressed in the scope of the environmental impact statement, as it is considered by the City Planning Commission.

Given the continuing rate of market development throughout Greenpoint/ Williamsburg over the last 5 years, as well as the additional height and bulk proposed on this site, we

ask the Commission to consider whether the 30% affordable housing, in the configuration proposed, is adequate to offset the current and anticipated environmental impacts on the community. We believe that additional affordable units must be considered and propose a minimum of 40% (or 900-1000 of 2,400) affordable units for low-income families and seniors.

Further, the EIS should consider the extent the proposed development will use government subsidies, above the cross subsidy benefit from the additional market units permitted by the additional height and bulk proposed on the site through the requested zoning change? What will be the impact of this on the potential production of other affordable housing units in the community?

We are also very concerned about how the Commission will evaluate secondary displacement resulting from the proposed development in the EIS. In particular, the suggested method to identify the populations at risk of displacement includes "the portion of the population living in units not protected by rent control, rent stabilization or other rent regulated program."

However, our experience has shown conclusively that rent regulated tenants are also at risk from harassment and other tactics. (We would be happy to supply more detailed examples if needed.) This impact of market rate development on secondary displacement was recognized in the Williamsburg/Greenpoint rezoning plan with the inclusion of additional mitigation through special anti-harassment provisions and additional resources to protect tenants from displacement. We believe that these factors and similar additional protections need to be considered and included in this rezoning as well.

We are also concerned that the plan include concrete proposals to ensure that local residents have access to both construction and permanent jobs on the site and would be happy to share our 30 years of experience in this area with the developers and the Commission to help develop an effective plan to achieve this goal.

We appreciate the opportunity to provide this testimony to the Commission and look forward to continuing the dialog with you and other stakeholders in the community to develop an effective and balanced plan for rezoning this important site.