The New York Community Council

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Public Scoping Hearing Testimony
Draft Scope of Work for the former Domino Sugar Factory
Environmental Impact Statement

This testimony, submitted before the 10-day expiration date of public testimony of August, 10,2007, is hereby endorsed by The New York Community Council the following are comments, by task, that should be considered in preparing the draft EIS.

Task Land Use, Zoning and Public Policy
The draft EIS should study, as an alternative, a reduction of units to 2000 with 800 units set aside as affordable housing. The Bloomberg administrations failure to downzone the Southside of Williamsburg during the 2005 rezoning call for a close look at the impact of the proposed 400ft towers.
Northside Williamsburg was downzoned with R6a or R6b zoning to offset some of the increased density of the towers now being built on the Northside of Williamsburg. These important protections were not granted to the Southside. of Williamsburg.

Task : Socioeconomic Conditions
The draft EIS should study the economic feasibility of 40% affordable housing with 1/2 low-income ($18,000 to $35,000), and 1/2 moderate-income ($35,000 to $57,000) The Draft EIS should examine the effects of the action on socioeconomic conditions in the study area, including population characteristics, increase in economic activity, and the potential displacement of businesses and employment from the proposed action area. The analysis should follow the guidelines of the *2001 CEQR Technical Manual* in assessing the proposed actions effects on socioeconomic conditions within ¼- and ½-mile study areas The

principal issues of concern with respect to socioeconomic conditions are whether a proposed action would result in significant impacts due to: indirect residential displacement; and indirect business displacement In conformance with the *CEQR Technical Manual* guidelines, the assessment of these areas
of concern should begin with a detailed analysis.

Task : Historic Resources The New York Community Council is pleased that the New York City Landmarks Preservation Commission has calendared a significant north Brooklyn industrial site for designation as a New York City Landmark. LPC voted unanimously to designate the processing house of the Domino Sugar refinery in Williamsburg Brooklyn. The processing house, which dates to 1883, is an icon of the Brooklyn waterfront. The structure housed three separate sugar refining operations in one vertically-integrated factory: the Filter House; the Pan House; and the Finishing House.

The calendaring focuses on only one building in a six-block site located on either side of Kent Avenue between Grand Street and the Williamsburg Bridge. While much of the remainder of the site consists of more recent structures of lesser architectural value, the calendaring omits the Adant House at South 5th Street, an 1883 building in which sugar cubes were manufactured, and a smaller 1883 power house located adjacent to the processing plant. The New York Community Council has advocated for the preservation of these two structures, and will continue to do so.

Task :Public Safety
The draft EIS should consider the impact on response times to Fire, Medical and Police emergencies.
With a 45 second increase in response time to structural fires in the area formerly served by Closed Engine Company 212 at 136 Wythe ave. what impact will 2400 residential units and 220,000 square feet of retail have on response times? Response times increases for medical emergencies and Police incident must be included in the draft EIS

Task : Energy
The draft EIS should consider requiring new or rehabilitated buildings that comply with green building standards as set forth by the U.S. Green Building Council's
Leadership in Energy and Environmental Design (LEED), minimum silver standards.

Task : Traffic, Parking and Mass Transit

The draft EIS should consider the impact of up to 2400 residential units and 220,000 square feet of retail on
Traffic and parking. What will the impact of this proposal have on our already stressed roads and lack of parking for current residents? 1,450 accessory parking spaces would be located on the project site, in below-grade parking *With the L train already severely overcrowded, and the J and G trains overflowing during rush hour, drastic population increase can have only one of two results: a greater number of people driving through Williamsburg, or a significant increase in rider-ship on public transit lines.*

Task : Air Quality
Williamsburg, which is in Brooklyn Community District 1, has one of the highest asthma rate in the City.
Asthma, which causes wheezing, coughing and shortness of breath, is the most common chronic disease among the children of Williamsburg. Air pollution and high concentrations of traffic in a densely populated area are factors contributing to the asthma problem.
Approximately 5-10% of fine particle pollution is from soot from diesel exhaust, which seems to have the worst effect on the children's asthma. Williamsburg is one area of the City that exceeds current federal air quality standards for fine-particle pollution. New York State will be required to submit a plan to the federal Environmental Protection Administration by 2008 detailing how it will bring its fine-particle pollution levels into compliance with federal clean air standards.
Therefore, consideration should given in the draft EIS to limiting truck access to the proposed site, for morning delivery and pickup only, limit diesel-fueled buses and encourage electric-operated
buses.
Until concerns regarding density, zoning, public safety and neighborhood identity and preservation are addressed alongside affordability, The New York Community Council cannot lend its support to CPC's development of Domino Sugar.

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