August 8, 2007

Robert Dobruskin, Director
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NYC Department of City Planning
22 Reade Street, Rm 4E
New York, NY 10007

Re: Draft Scoping Document Domino Sugar

The following inconsistencies/omissions were noted in the above document

Page 1b
There is no mention that the applicant's plans call for construction of buildings past the US Bulkhead line (see illustrative Site Plan Figure 4) over the existing dock. Approvals may be required from Federal Agencies. The applicant does not identify or define "upgrades" to the existing waterfront platform.

Page 1b
The applicant has repeatedly promised 30% "affordable housing" and sold the project to some community groups based on the affordable component, however, the applicant only "envisions achieving a goal of 30 percent affordable housing". The applicant does state that they intend to use the City's Inclusionary Housing bonus program. This program only requires 20 percent affordable housing and does not require the mix of affordability to be on the lower range of the AMI. In essence, it is quite probable that no affordable housing units will be built for the very group that supports this project. The applicant has also stated publicly, that this project will be socio-economically integrated. The text does not reflect the rhetoric.

Page 1C
Table 1 Existing Uses in Rezoning Area
Block 2403 Lot 15, Lot 37 incorrect description land use

Page 2 13b.
The applicant does not disclose how it is possible to define a pier as land area nor do they produce documentation that they own the land under the water. The deeds for the waterfront portion of this project are not consistent from one sale to the next.

Page 2 13d.
The applicant does not indicate which business would be a non-conforming use if they were rezoned.

Page 3 2.
See Page 2 13b.

Page 4 9.
The applicant states that under the proposed development plan there would be five new residential buildings-the number of buildings does not match the project description of up to 9 buildings on the waterfront site and 6 buildings upland. The statement that the bulkhead and platform which extends along the entire waterfront would be reconstructed for public access omits the fact that as per Illustrative Site Plan Figure 4 the applicant shows several buildings constructed over the pier.

Page 6 13.
Applicant does not identify the source for the 2.86 Brooklyn average households and if it is based on the 2000 census.

Page 7a-7e
The applicant omits the need to study the air traffic that utilizes the 34th Street Heliport. Both helicopters and sea planes take off and land at 34th Street. At the present time the flight landing path appears to be directly to the North of the Williamsburg Bridge on the Brooklyn side. The inclusion of tall towers need to be studied as it affects take off and landing patterns and general air safety. In addition, Police helicopters routinely patrol the East River from the Williamsburg Bridge to the 59th St. Bridge and the area close to the United Nations, an more so when dignitaries visit. Due to the large number of low flying aircraft, it would be prudent to include air traffic in the applicant's analysis. There is also no mention of any issues related to public safety by placing tall buildings in such close proximity to the Williamsburg Bridge. It should be noted that the City has spent in excess of $300 million dollars to refurbish and reconstruct the Bridge over the past several years.

Page 7C
The applicant ignores the implications of a combined sewer system and only discusses adequate water supply and not the adequacy of the sewer system. Flooding of basements and ground floors is common in the area during and after heavy rains, without the expected 8,000 plus residential units on the waterfront. Mitigation of this possible grave health problem must be addressed.

Page 11 Task 2
Study area should include a larger area as this project will impact on the entire community of Williamsburg/Greenpoint especially on the IBZ located to the North of the Project which includes the upland side of Kent Ave.

Page 12 Task 3
Indirect residential displacement is not the only subject that requires a detailed analysis. Indirect business and institutional displacement must be studied. The study area should include those sections of Williamsburg/Greenpoint that were left manufacturing in the

last rezoning. Because this project is on the waterfront the study are should be elongated as the effects of this project will stretch the length of the waterfront from the site to the end of Franklin Avenue and inland to McGuiness Blvd.
The non-project rezoning area does not identify the businesses that would become "grandfathered" or non-conforming as a result of the rezoning. These businesses will not be able to expand their businesses or would face disruption of industrial activities due to a change in the performance standards.

Page 13 Task 4
The applicant needs to accurately determine the number of children in the area that have the potential to use the nearby public schools.

Page 14 Task 5
The applicant needs to consider a larger study area and the fact that there has been a population explosion in the area since the 2000 census.

Page 18 Task 9
Given the mega-size of this project, it will dramatically alter the character of the neighborhood and should be studied and not explained in "summary fashion".

Page 21 Task 13
There is no mention of how the applicant will get information of combined sewer overflow events.

Page 21 Task 14
Any study should include the estimated number of "new" trips and the impact on the traffic. The applicant should not assume that the present Sanitation garage located at N 12 and Kent Ave. will service the area, as it has been remapped as a park.

Page 22 Task 16
Given that Williamsburg/Greenpoint has only one major truck route (see attached map) that services the area and currently has a density that does not require numerous traffic lights or even stop signs, the traffic analysis should include the impact on traffic patterns and air quality if more traffic lights are required. Any traffic analysis should include the movement of trucks and delivery vehicles and the problems associated with no "daylight" at corners, (no cars parked at corners). If parking spaces need to be removed to facilitate trucks turning corners, the analysis should include the number of parking spaces lost.

The applicant makes no mention of the number of anticipated trips by car that will be generated by the inclusion of both commercial and community space and where visitors will park. The proposed parking lot is unattended and only for residents.

There is no mention of bicycle traffic in the area and how the project will impact this important mode of transportation and the safety of the riders. It is well documented that hundreds of people ride bikes to and from the subway.

In addition, the traffic analysis should include - traffic routes and the impact of additional vehicles going to the Mid-town tunnel. The applicant does not mention that this area has a vibrant night-life and that traffic is often backed up on weekends after midnight. The evening hour traffic on weekends should be studied.

Page 24 Task 17
The Greenpoint-Williamsburg Rezoning FEIS (May 2005) ignored the actual conditions of the area subways and buses. The only mitigation in the recent rezoning was to enlarge the stairs on one side of the street at the Bedford Ave Station. This does not address the intense overcrowding on this subway line or on the fact that the MJZ has recently seen a large increase in riders which is also resulting in overcrowding.

Page 24 Task 17B
Given the anticipated large number of new vehicles in the area a more comprehensive pedestrian analysis should be conducted which should include many more intersections.

Page 29 Task 22
It is odd that the applicant did not include any alternative development options. The applicant makes the assumption that LPC will only landmark the Refinery Building. Does the applicant know something that the general population does not? Several alternatives have been suggested by the community and have been included in the comments.

The word on the Street is that this project is a done deal. Hopefully this is not the case, and the City will scrutinize the rezoning application and do what is right for the benefit of the entire City.

Submitted by
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