Arthur J Bretnall, III

330 Wythe Avenue #2D
Brooklyn, NY 11211

August 10, 2007

Robert Dobruskin, Director
Environmental Assessment & Review division
NYC Department of City Planning
22 Reade Street, Rm 4E
New York, NY 10007

Dear Sir:

This letter is in response to the Community Preservation Corporation's application to rezone the Domino Sugar Processing plant's usage from heavy industrial to residential. At first blush, this project seems a little too ambitious, considering the fact that the CPC is proposing that their project will succeed only if they are granted the same sort of broad and sweeping variances enjoyed by the Greenpoint/Williamsburg rezoning of 2005 from R6-R8 to MX.

As a business owner, my warehouse is now in the middle of the "donut hole," "industrial sanctuary, or the remains of the industrial zone that connects Greenpoint and Williamsburg. From my perspective, it will take many years to feel the real and tangible impacts of the 2005 rezoning, namely, only after all the building is finished and all the new people are moved in will we have a realistic sense of this new rezoned population's burden on such things as public transportation and the industrial truck route. ZR 23-922 and ZR 62-35, should not be considered as a "given" in this study; nor should their proposal to permit encroachments into a truck route be taken seriously. In my mind, to preserve the south side of Willisamsburg, no variances should be permitted for this project and the CPC should be forced to build within the limitations of the property which, as public record shows, was purchased for approximately 55 million dollars as an industrial property. In the vernacular, CPC will make out really good if *any* rezoning occurs. In my opinion, any claim of hardship without variances on a developer such as this should be considered for what it is – ridiculous.

Mr. Gillespe, Executive Director of NAG (Neighbors Allied for Good Growth) made an important connection as he concluded his response to the public scoping meeting for CPC. The combination of the Kedeem Winery rezoning down the street with the rampant development outside the rezoned areas renders the City's original estimate of 7,400 new residential units no longer a realistic number. A complete re-evaluation of what Williamsburg can realistically sustain is now in order.

All things considered, it is time to re-evaluate the unnecessarily large proposal of the CPC's project. It would be in the community's better interest to have planning that

does not step on its neighbor's toes, adversely impact an already burdened industrial truck route, not to mention a presently burdened public transportation system, utilities, and educational facilities to name a few.

Sincerely,

Arthur J Bretnall, III

CEO Guerra Paint & Pigment Corp.