ROEBLING CHAPTER

Society for Industrial Archeology

Reply to: 40 W. 77th Street, #17B, New York NY 10024
212-769-4946
PreservatA@aol.com

July 31, 2007

Robert Dobruskin, Director
Environmental Assessment and Review Division
Department of City Planning
City of New York
22 Reade Street, Room 4E
New York, New York 10007

Dear Mr. Dobruskin:

I write on behalf of the Roebling Chapter, Society for Industrial Archeology. The Roebling Chapter is a not-for profit organization committed to the study, preservation and dissemination of information on our region's industrial past. Our chapter membership numbers nearly 500 individuals, at least half them residents of New York City.

Once the world's largest sugar refinery and the "jewel in the crown" of the monopolistic Sugar Trust, we consider the former Domino Sugar Refinery one of the city's most important remaining historic sites and have advocated for its preservation and re-use. In determining the scope of work for the environmental impact statement for the project proposed by the applicant, our primary concern is proper definition of the historic resources that may be impacted. beyond the three buildings proposed for landmarking

The Draft Scope of Work states that, "The New York State Historic Preservation Office (SHPO) has formally determined the portion of the project site complex at 292-350 Kent Avenue (between South 2nd and 5th Streets) to be eligible for S/NR listing." In fact, the site stretches two blocks further north to Grand Street. The SHPO's statement of eligibility is not limited to a portion of the site, but specifically identifies the three different periods of industrial design represented in the area from S. 2nd Street to Grand Street, encompassing the buildings of the 1920s and 1950s, many of which are at the northern end of the site.

In addition, there are former Domino buildings from the 19th century not on the site itself but which will be impacted by it. One is the building at 269-289 Kent, once used as a garage and office and part of the "non-project re'zoning area." The second is the former Havemeyers and Elder gas works at South 4th between Wythe and Kent. Since the refinery was re-built in 1883 using electrical lighting only, this gas works, later converted to a machine shop, may be a building from before the 1882 fire.

We look forward to continued participation in this process and specifically to recommending appropriate mitigation once impacts upon these magnificent structures are more fully determined. At a minimum, we feel a full Historic American Engineering Record documentation according to National Park Service standards is necessary.

Sincerely,

Mary Habstritt, Chair
Preservation Committee