WATERFRONT PRESERVATION ALLIANCE
of Greenpoint & Williamsburg

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

Via Fax: (212) 720-3495
2 pages total

Dear Mr. Dobruskin:

This letter is submitted in response to the "Draft Scope of Work to Prepare a Draft Environmental Impact Statement for the Proposed Domino Sugar Rezoning".

The Waterfront Preservation Alliance is a neighborhood-based alliance that seeks to identify and protect historic resources in the North Brooklyn neighborhoods of Williamsburg, Greenpoint and Bushwick. WPA has long advocated for the designation and appropriate adaptive reuse of the Domino Refinery.

The redevelopment of the Domino site is an exciting opportunity for growth and change. However, the scope of the project as now proposed will have very real and significant impacts on historic resources both on and off the development site. The proposed Domino project, as outlined by the developer in the draft scoping documents, is significantly taller and significantly denser that previous rezoning actions in the Williamsburg/Greenpoint area. Therefore, WPA feels that significantly increased scrutiny is warranted in all areas of the Environmental Impact Statement, including historic preservation, urban design/visual resources and neighborhood character.

With regards to the Draft Scope of Work, WPA has the following comments related to task 7, Historic Resources:

1. First, a technical correction to the draft scope, as issued. On page 16, the draft scope states that the portion of the site west of Kent Avenue and south of South 2nd Street has been determined eligible for the National Register of Historic Places. In fact, the determination of eligibility, which was conducted at WPA's request, found that **the entire waterfront site west of Kent Avenue and south of Grand Street is eligible for listing on the National Register.**
2. WPA has requested that the Landmarks Preservation Commission designate the Adant House and the Power House in addition to the main refinery building that is now under consideration for local Landmark designation. It is the position of WPA that these structure, both of which date to 1883, can be adapted for residential or other uses in keeping with the goals of the project developer. For the purposes of the scope of work for the EIS, **WPA requests that the retention and adaptive reuse of these buildings, and all other historic**

buildings on the development site, be included in the scope for the base review and all alternatives.

3. In addition to the impact of the project on historic resources located on the development site, WPA requests that the impact on all surrounding sites be included in the review of the base scope and all alternative. Because of the size of the development, WPA believes that there is potential for serious impact on historic resources well beyond the 400' perimeter defined in the draft scope. These impacts include not only shadows and visibility of the taller elements, but the significant secondary development pressures caused by the very high density of the proposed project. **Therefore, WPA requests that the study area for historic resources be extended from 400' to a ½ mile *perimeter*. We also specifically request that all potential historic districts be identified as part of the scope of work.**

4. **With regard to specific historic resources to be studied, WPA notes that the following properties are among those within a ½ mile radius that appear to be eligible for listing on the state and national registers of historic places:**

    a. Proposed Fillmore Place Historic District (and certain individual buildings within the district): Fillmore Place, including parts of Driggs Street.

    b. Potential Grand Street Historic District (and certain individual buildings within the district): Grand Street from Kent Avenue to Roebling Street.

    c. Potential Broadway Historic District (and certain individual buildings within the district): Broadway from Kent Avenue to Roebling Street.

    d. Potential Southside Historic District (and certain individual buildings within the district): Roughly bounded by Grand Street, Wythe Avenue, Broadway and Havemeyer Street.

    e. Matchett Candy Factory building (South 4th and Wythe).

    f. Former Havemeyers & Elder power plant (South 4th Street).

    g. Former Domino Sugar office and garage (269-289 Kent Avenue).

    h. Former industrial buildings on Kent Avenue between South 4th and South 5th Streets.

5. **WPA requests that all reviews study the impact of the proposed tower heights on views of the Williamsburg Bridge, a highly significant historic resource.** These studies should include views of the bridge from both Brooklyn and Manhattan, and the public waterways.

6. Because of the very real possibility of additional Federal or State action, the Domino project is likely to be subject to review under Section 106 of the National Historic Preservation Act or Section 14.09 of the New York Historic Preservation Act. **WPA formally requests consulting party status in any Section 106 or 14.09 review.**

7. The Domino site includes highly significant historic resources in the form of machinery and processes internal and external to the buildings on the site. **WPA requests that any mitigation for the site include HAER Level I documentation of this machinery and processes, as well as the historic buildings on the site.**

WPA thanks the Department for the opportunity to comment on the draft scope.

Yours truly,

Alice Rich