c: Kieves
Kapur.
Slatkin
Lenard
Dinerstein

Introduction

My name is Leah Kreger. I'm an architect who has been in private practice for 14 years with many completed residential, industrial and commercial projects constructed in Williamsburg and Greenpoint. My husband Miles Bellamy is a book dealer with a store on Bedford Avenue near the L train. It has been a joy to raise our four-year-old daugther in Williamsburg with so many children nearby.

Seeing the development of Williamsburg is something that concerns us personally and as a community. I am aware of the need for a certain amount of density in order for our city to grow, and I'm not against development; however, I would like our community to increase its density in moderation.

We hold the opinion that the proposed rezoning of Domino needs to be considered cumulatively with the effects of the zoning adopted in 2005 for the waterfront from N4th to Manhattan Avenue. The neigborhood needs assistance financial and otherwise to create a comprehensive plan instead of spot rezoning such as that proposed for Domino.
Perhaps CPC has the wherewithall to support a comprehensive community plan given the magnitude of their investment.

Please note that we are very much in favor of preserving existing affordable housing and creating new affordable housing that preserves the quality of life in the neighborhood and character of the buildings.

Careful consideration is requested, also with regard to Domino's unique position in the history of New York. The Domino Sugar site has an historic importance that goes back to the roots of New York City. Like Ellis Island, although not with official status as such, many immigrants touched U.S. soil for the first time there. This makes it an area to be considered even more carefully.

We respectfully request an extension of the time for public comment considering that many New Yorkers are on vacation.

Below we will comment on the plan following the structure of the proposal, per task.

Task 1: Project description

In general, we request more information about the architectural design in order for the public to have a sufficient understanding upon which to comment, i.e:

- What do the proposed buildings look like in terms of surface material?
- What is the proposed connection to Grand Ferry park and South 5th street?
- How does the applicant propose to construct the basements in the waterfront location?
- How much parking is proposed to be located where? Where are the entrances and exits proposed?
- How will the applicant address the extremely narrow side walks on Kent Avenue?
- What are the differences between the proposed upland connections on the north and south sides of the refinery buildings, and those on North 1st and South 4th street?

- What will the upland building look like?
- Since the affordable component figures prominently, please have the applicant describe the strategy for financing the affordable component as they relate to tax and government subsidies.
- What amenities will be proposed such as public bathrooms, seating, lighting, bicycle racks and drinking fountains?
- Please clarify the total number of units.

Task 2: Land use, Zoning and Public Policy

The developer claims that approximately 268,765 sq. feet of water surface area extending to the pier head line, is directly affected by this proposal, and that "The Water surface area includes the portion of Block 2414, lot 1 that is underwater."

Considering the sensitive nature of claiming formerly public lands on the East River, I respectfully request that you require legal support for such a claim, documentation of clear title, and an examination of public lands.

Task 3: Socio-economic conditions

The proposed average size of the affordable units (726 sq. feet) is 2/3 the size of the market rate units (as Susan Pollock of CPC said on 6.28.07). As such, the affordable units will not address needs for large working class families who need 2, 3 and 4-bedroom apartments. I respectfully request that the city require minimum room counts in the affordable apartments when considering the developer's request.

We ask you to consider how the proposed shuttle bus service will affect local businesses - between Domino and the J,M, Z stop on Broadway and the Bedford Avenue stop on the L-train - that rely on pedestrian traffic and could otherwise benefit from the development?

We are concerned that new condos are being purchased as investments by people who don't live in the country and don't live in the apartments much of the time. Can any mitigation be examined to prevent "emtpy" apartments from causing secondary displacement of housing for low income families?

Task 4: Community facilities

An informal group of parents in the area has organized to address the state of the public elementary schools. Schools effect an area larger than the proposed study area - considering that many children go outside their district to attend school. I am concerned that the proposed development will exacerbate that trend - instead of putting much needed parent resources into local schools. Please read attached appendix 1- written by the parents of the Williamsburg/Greenpoint Schools Initiative Group (WIGSIG). The article is also available online via http://parents11211.com/article.php?story=20070611150839559 .

I request a survey of children and an assesment of who is attending school in district in a large study area, since the 2000 Census and Department of Buildings certificate of

occupancies do not show this information.

Task 5: Open Space:

Considering the large number of children who already live and/or play within the area, where will the playgrounds be located and will they be accessible to the general public?

Who does the applicant see as using the open space? Have they studied how they will travel there? How will that affect the parkings? How have they addressed bicycle parking?

Task 8: Urban design/visual resources and
Task 9: Neigborhood Character

To quote the Zoning Resolution about, the general purpose of residential districts, (ZR, 21-00e) it is "To protect the character of certain designated areas of historic and architectural interest, where the scale of building development is important, by limitations on the height of buildings."

One of the defining characteristics of Williamsburg as noted by many residents, is its relationship to **light**. Because most of the buildings are 3, 4 and 5 stories, residents enjoy an exceptional relationship to the sky and daylight. The proposed buildings would block much of the light, views on the Williamsburg Bridge and Manhattan Skyline - three of the neigborhood's defining characteristics.

Two of the proposed buildings are more than ten times higher than most of the existing highest neighboring buildings in the ¼ mile, ½ mile and ¾ mile study areas, excepting those as Schaffer's Landing and Northside Piers. They are proposed to be more than twice as high as the buildings facing them on the other side of the East River.

I provide Appendix 2: a collection of photographs that show the charcter of Williamsburg and its visual resources.

I request in independent field study and interviews to assess the visual resources, pedestrian activity and character of Williamsburg. How many apartments would have shorter days and be in darkness? How many apartments woud loose their view of a neigborhood landmark - The Williamsburg Bridge?

Task 10: Natural Resources

Since the area is known to be the habitat of Perrigrine falcons as well as water fowl, swallows and cormorants, we ask that investigative field work not only take into account endangered species but other animal life as well.

Task 16: Traffic and Parking

Several intersections near schools in the study areas are in need of traffic lights, i.e. all the intersections around PS.04, the Williamsburg Neigbourhood Nursery School, Kids in Control, Streb Lab for Action Mechanics and Padre Kennedy Head Start. We ask for a specific traffic study and mitigation that addresses the safety of our children in respect to these intersections and their schools.

In light of Mayor Bloomberg's Congestion Pricing proposal, we applaud the consideration of a shuttle bus to the trains and water taxi service. Nonetheless we are concerned that the proposed development will create more dependence on cars, since there are no subway entrances within 1/4 mile radius. I am also concerned that the expense of water taxi services, and high priced retailers will be way beyond the means of families living in the affordable apartments.

We request that when considering the on-street local parking conditions, that existing need for parking be inventoried.

Task 19: Noise

Noise complaints continue to be the number one quality of life issue for New York City residents. The City's new noise code (Local Law 113 0f 2005) took effect on July 1, 2007. We ask that the developer submits a mitigation plan as per the new noise law.

Task 22: Alternatives

We ask that you consider a community plan based on the density outlined in the Williamsburg 197A plan and the density proposed by GWAPP in 2005.

See appendices 3, 4 and 5.

APPENDIX 1

WILLIAMSBURG/GREENPOINT SCHOOLS INITIATIVE GROUP DECLARATION

Monday, June 11 2007 @ 03:08 PM EDT

The following declaration outlines the issues for which WiGSIG has requested the Department of Education's response at the Town Hall and was also sent to Joel Klein via e-mail, fax, and regular mail.

We the parents of the Williamsburg/Greenpoint Schools Initiative Group request that the Department of Education implement a comprehensive plan for the improvement of our local public schools in District 14.

The Department of City Planning's rezoning proposal for Williamsburg/Greenpoint was adopted by the City Council two years ago on May 11, 2005. Now, the rezoning plan and rising housing costs have vastly altered the demographic of these neighborhoods. Economic displacement has drained several of our local public schools, while many neighborhood residents are sending their children to out-of-district schools which they feel better meet their educational needs. Paradoxically, enrollment in District 14 is projected by the Department of Education to fall 34% between 2004 and 2014 even as the neighborhood's population is projected to rise drastically in coming years.

We ask the Department of Education to update our neighborhood residents on the promise made in the Department of City Planning's Environmental Impact Study wherein it was stated "that if the Greenpoint-Williamsburg rezoning is approved, the City would construct or lease a new elementary or K-8 school...as part of the Department of Education's Five Year Capital Plan."

We the parents of WiGSIG do not accept this two year silence or this paradox and want to know the plan. What is the Department of Education's vision for all of our local schools to better meet the needs of their existing students as well as to make them more attractive for the influx of new residents?

For our public schools to succeed in serving all the families residing in District 14, a community-based solution needs to be facilitated, supported, and executed by the Department of Education. WiGSIG wants to partner with the DoE and offers the following as immediately necessary toward this end:

1. A task force made up of the leadership of the District 14 school community must be empowered to partner with the DoE to assess the needs of our diverse district. The Community Education Council and the Education Committee of Community Board #1 will be charged with coordination of this task force, which will also include representatives from local community-based organizations, District 14 schools, and parent organizations.

2. Create a study to determine the extent of student flight from District 14 to other districts throughout Brooklyn and Manhattan, and address the underlying reasons for this flight. The Department of Education must explain its projected 34% decline in district-wide enrollment during a time of sharply increasing neighborhood population.

3. Adjust the facilities budget to reflect the real needs of District 14. Enrollment projections for the School Construction Authority show a dramatic decline across the District. This study does not take into account the Williamsburg/Greenpoint rezoning and concurrent growth in housing construction affecting District 14. A school-by-school study of the District must be prepared and the facilities budget must be adjusted based on the results of this detailed, up-to-date study.

4. Create and implement real solutions for schools existing now in inadequate facilities. Available facilities such as closed parochial schools and sites for new construction must be secured for use by schools in need the moment they become available.

5. Create an analysis of the balance of elementary, middle and high schools in District 14 to better judge whether the distribution of facilities is optimal, if additional facilities might be needed, and if the District is better served by the absorption of middle schools into K-8 and/or 6-12 schools.

6. Disclose plans and work in partnership with the members of this community to most advantageously uphold the promise of the EIS and construct or lease optimal public education space in District 14.

WigSIG also proposes the following as a long-term solution for District 14 schools:

7. Relax primary school zoning restrictions, and support each school in developing its unique model of success. This will challenge schools to improve to attract students, empower parents to choose which school best suits their needs, and encourage a diversification in successful educational models throughout our district that reflects the diverse needs and desires of this community.

The DoE must act NOW to ensure that our local public schools reach their highest potential to better serve all the residents of District 14.

The Williamsburg/Greenpoint Schools Initiative Group looks forward to partnering with the Department of Education to accomplish these essential goals.

Williamsburg/Greenpoint Schools Initiative Group

APPENDIX 2

Photographs of Williamsburg's streets











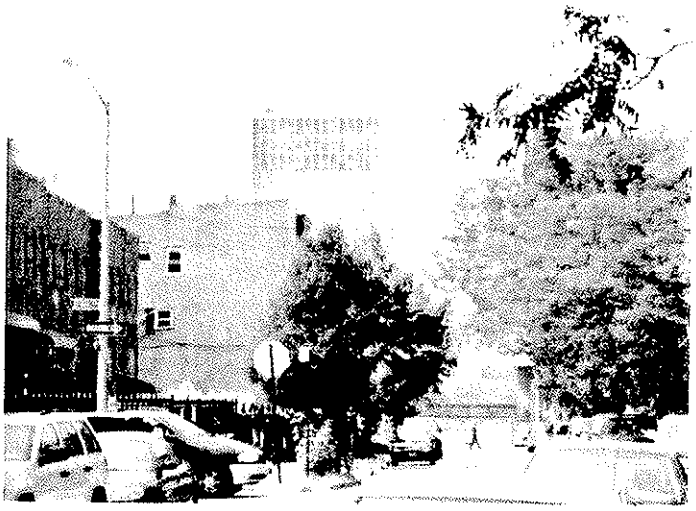














APPENDIX 3
8.9.07



(not to scale)

DOMINO COMMUNITY PROPOSAL 1

PERSPECTIVAL RENDERING - WEST ELEVATION

PROPOSED DEVELOPMENT PROGRAM

If approved, Community Proposal #1 would allow the re-construction of and addition to the existing low building on the waterfront between Grand Street and S. 2nd Street. The modification would expand the low building and create 4 "rotundas" to the top between 120' and 170' tall – with the high points of each falling just above and just below the top of the existing Refinery Building. The top of the low portion of the building would be a public plaza to be accessible from the proposed community facility. In addition to the proposed waterfront esplanade, the open space between the Refinery Building and the esplanade would also be public. Tunnels would provide a visual connection to the East River as a continuation of S. 1st St. below the plaza – which currently does not exist- and retain the existing view west above the plaza. The building would be used as a mixture of community facilities and retail/commercial.

The program for the Refinery Building has not been finalized. If the Refinery were designated by the LPC, the project sponsor would have to apply for a Certificate of Appropriateness. Ground floor retail/commercial would be located on Kent Ave. The sidewalk would be widened at ground floor level within the footprint of the existing building.

The low building between S. 3rd Street and S. 5th Street would be reconstructed to become a visual "base" for 2 residential towers up to 220' tall. The Adant House would be preserved and modified. A tunnel would provide a visual corridor to the water as a continuation of S. 4th Street, which currently does not exist. The view corridor to the west above the low building would be maintained.

The public could access the waterfront esplanade and the open space between the Refinery and the East River from Grand Ferry Park, S. 2nd Street, S. 3rd Street and S. 5th Street.

It is anticipated that the development would be served by water taxi service and provide a public boat launch area. Shuttle bus service would link the development to upland retail/commercial areas and nearby subway and MTA bus stops.

One new residential building would be constructed on the upland lot along Kent Avenue between S. 3rd and S. 4th Streets. Retail/commercial would be located along Kent Avenue.

The community proposal would be to develop the waterfront parcel at 3.4 FAR, taking into consideration recommendations put forth by the Williamsburg 197A plan, which is especially important in light of the combined affects of the recently rezoned areas in addition to the affects of rezoning Domino. It would have a c-42 overlay on the waterfront parcel, with R-6 zoning on the upland parcel.

Community Proposal #1 would facilitate approximately 1.5 million gross square feet of development above grade, including the reuse of the Refinery Building. Approximately

1,100,000 sq. ft would be dedicated to residential use, 100,000 sq. ft for retail/commercial use, and 300,000 for community facility use. The first alternate plan would create up to 1000 residential units based on an average size of 1,100 gross square feet, depending on the program for adaptive re-use of the Refinery. There would also be 1100 accessory parking spaces located on the site in below-grade parking as well as a significant amount of bicycle parking.

PROJECT GOALS AND OBJECTIVES

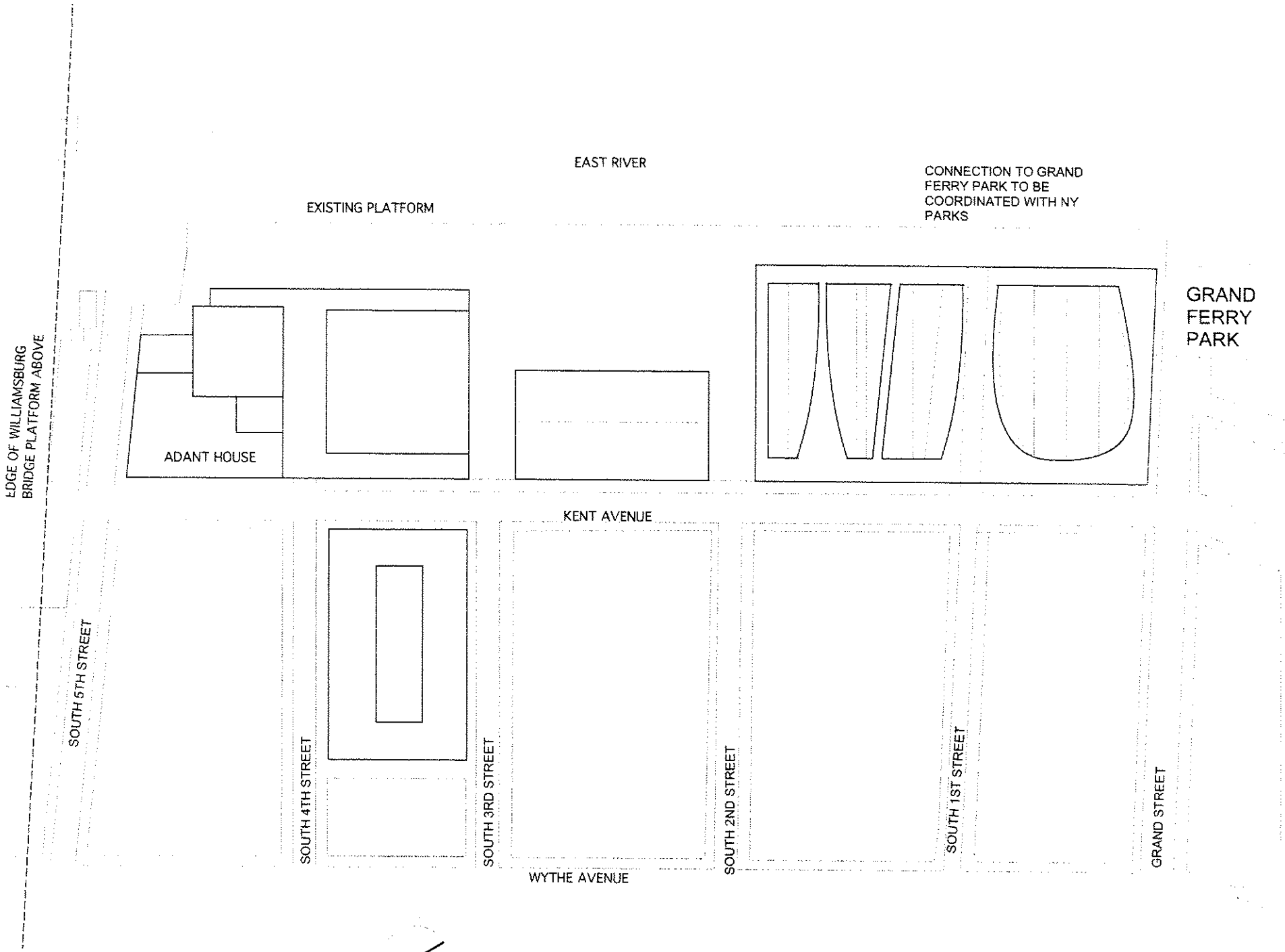
The project goals and objectives are identical with those of the Applicant:

- Creation of a substantial amount of affordable housing with high quality design.

- Redevelopment of a former waterfront industrial site into an economically integrated mix of residential, retail/commercial, and community facility uses consistent with the redevelopment of nearby waterfront sites to the north and south and complementary to the existing neighborhoods.

* Creation of physical and visual access to the waterfront, including a substantial amount of public open space and a linkage to Grand Ferry Park to the north of the site.

- Reuse of the three buildings comprising the structure known as the Refinery Building.



MINO SUGAR COMMUNITY PLAN 1
'T TO SCALE

DIAGRAMMATIC SITE PLAN
Appendix 5 8/8/07