SOUTHSIDE UNITED HOUSING DEVELOPMENT FUND CORPORATION 213 SOUTH 4TH ST. BROOKLYN, NY 11211-5605
(718) 387-3600 FAX (718) 387-4683

August 2, 2007

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

TESTIMONY BEFORE THE CITY PLANNING COMISSION ON THE DRAFT SCOPE OF WORK TO PREPARE A DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED DOMINO SUGAR REZONING

- **Inclusionary Housing Program**-The owners of the Domino Sugar site, CPC Resources, Inc. and the Kattan Group, LLC, are requesting a zoning text amendment that would allow them to include the site located across from the refinery buildings in the Inclusionary Housing Program. If the zoning text is amended, CPC would be allowed to transfer 190,000 SF of floor area development rights across Kent Avenue from the waterfront parcel to the upland parcel.
    - Under this scheme, the proposed project would yield approximately 2,400 residential units with 30% of those (720) developed as "affordable housing".
    - The Inclusionary Housing Program allows for "low income units" to be rented to families at or below 80% of AMI while the " moderate income" units are to be rented to households with incomes up to 125% of AMI. This income range does not meet the needs of our community.
    - It is essential that a significant amount of the new housing serve the residents of the community board. Southside United HDFC (Los Sures) is pushing for the affordable units to be made available to households with a wider range of incomes in order to meet community needs. Typically, Los Sures development projects serve households with incomes ranging from 50-60% of the AMI. According to the Furman center for Real Estate and Urban Policy of New York University, the area median income in Greenpoint-Williamsburg was $35,000 in 2005, approximately half of the current AMI for Kings County, demonstrating the need for units to be made accessible to a much wider range of incomes than is required under the Inclusionary Housing Program. In addition, it is also essential that the ethnic and racial mix of the neighborhood be maintained in any new housing built on the waterfront and the data supports our contention that only rents well below market could accommodate families from the Latino, Polish, Italian, Hasidic, and Asian households that now make up Greenpoint-Williamsburg.
    - **Unit Size**-Affordable units should be made available in a range of sizes to meet the needs of larger families. For example, in a recent marketing of a low-income tax credit project owned

AUG-9-2007 19:02 FROM:LOS SURES SENIOR 17183843366 TO:917189634527 P.4

by Los Sures, the average household size of over 1,000 applicants was 2.5, demonstrating the need for 2 and 3 bedroom units amongst those seeking affordable housing.

- **Location of Affordable Units-**It is not specified in the proposal whether the affordable units will be incorporated into and dispersed throughout the larger development on the waterfront as well as on the upland site. Rather, it is implied that that the affordable units will be built on the upland site instead of on the waterfront. Los Sures has always supported the integration of affordable units along with market rate units throughout development projects. We do not support a clear separation of the affordable units from the buildings on the waterfront.

- **Environmental Impact Statement-**The Environmental Review Process utilizes a variety of indicators to determine the extent of the impact of the project on the surrounding neighborhood.
  - **Socioeconomic Conditions-**The scope of work for the Environmental Impact Statement will look at the effect of the project on indirect displacement of the at-risk population. Although the scope of work proposes to identify the population at risk of displacement by determining the portion of the population below the poverty level and the portion with income levels that are lower than the median for Brooklyn, it excludes those households living in units protected by rent control, rent stabilization, or other rent regulated programs. It is Los Sures' position is that when analyzing the effect of the project on indirect displacement, the EIS must include those residents who are currently living in units under rent regulated programs. It has been our experience that these families are in great danger of being displaced, as private landlords continue to harass tenants out of these units by refusing to make repairs and offering cash payment to force people out of their rent regulated apartments. All this is done in an effort to remove rent restrictions from their buildings, resulting in a loss of affordable housing units forever from the neighborhood.
  - **Expansion of Study Area-**The Draft Scope of Work proposes to limit the study area for the Environmental Impact Statement to a ½ mile radius from the project site. Los Sures believes that this is an inadequate assessment of the impact that a project of this magnitude would have on the surrounding community. We request that the study area be expanded to at least a 1 mile radius to ensure that the impact of this development on the surrounding commercial strip on Broadway and the residential areas located around the major subway stops at Marcy Avenue and the bus depot at the foot of the Williamsburg Bridge are adequately addressed. We are already seeing a loss of small business in the area due to the pending construction of the waterfront properties and expect that the indirect displacement of smaller businesses catering to the predominantly Latino community will only continue to worsen as projects are completed.

- **Marketing-**Los Sures owns and manages subsidized housing and has conducted many marketing efforts as required by HPD and Affirmative Fair Housing laws. We see the necessity of not only ensuring that a large portion of the units are affordable to low, moderate, and middle income families, but that Los Sures play an official role in the marketing process to ensure that this site in the Los Sures service area not be yet another segregated housing development. We request that the marketing procedures for the low income units be monitored by an appropriate agency and follow the following marketing guidelines:
  - Advertising in a newspaper of general circulation for a specified period of time
  - Notice is given to the Community Board and, in fact, applications are made available at the Community Board Office and are mailed to those on local housing organizations' waiting lists
  - Eligibility guidelines are clearly stated
  - Applications are mailed into a Post Office box, selected by lottery, and logged in publicly.

Submitted by: Sandy De La Cruz
Director of Development
Southside United HDFC (Los Sures)

AUG-9-2007 19:02 FROM:LOS SURES SENIOR 17183843366 TO:917189634527 P.5