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July 31, 2007

Mr. Robert Dobruskin
Director, Environmental Assessment and Review Division
Department of City Planning
City of New York
22 Reade Street, Room 4E
New York, N.Y. 10007-1216

Re: Public Scoping Meeting on the proposed Domino Sugar Rezoning

Dear Mr. Dobruskin:

Thank you for this opportunity to address the scope of the environmental assessment for the proposed Domino Sugar Rezoning.

One of the key issues to be addressed by the Environmental Assessment and Review Division and the applicant for the Domino Sugar Rezoning is the creation of public access to the waterfront, and the long term public character of these public spaces to be provided as part of the proposed action.

The recently created Waterfront Open Space Master Plan in Greenpoint and Williamsburg just to the north of the project area sets an important precedent and context for the proposed rezoning in this area and its environmental review. To insure the seamless connection and experience of the north Brooklyn waterfront, we suggest that the waterfront esplanade and additional open space be designed and operated as is being formulated for the waterfront open spaces of the Greenpoint Williamsburg recent rezoning. Extending the provisions of the Waterfront Open Space Master Plan to South Williamsburg was an important conclusion from the more than 100 residents attending a community design workshop held last May by RPA and Brooklyn Greenway Initiative.

In terms of design, the open spaces to be provided in the Domino Sugar large scale development plan should be consistent with the Greenpoint Williamsburg Master Plan, especially as it pertains to the connections to Grand Ferry Park, South 5th Street, and the design elements of the esplanade and supplemental open spaces.

In terms of ownership, this rezoning should offer similar incentives for the transfer of title of the proposed waterfront open spaces to the City, just as was the case for Greenpoint Williamsburg rezoning. RPA believes that to ensure the long term public character of these public spaces, it would be best if title was

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transferred to the New York City Department of Parks and Recreation, and management was made the responsibility of Parks or a partnering non profit organization. As per Greenpoint Williamsburg, the construction and management funding would still be the responsibility of the developer.

Another key issue is ensuring a safe and welcoming environment for bicyclists and pedestrians. RPA has been working with the Brooklyn Waterfront Greenway to create a 14 mile landscaped, off-street path along the entire waterfront. The bikeway of the Greenway, which has received substantial federal, state, and local support, is proposed to run along Kent Avenue right though the proposed development site. The environmental assessment should consider the number of pedestrians and bicyclists expected in the area, and consider how the greenway might safely accommodate these people.

Sincerely,

L. Nicolas Ronderos
Senior Planner