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Re: Domino Sugar Scoping Hearing

There are a number of issues I have with the scoping document. One is the statement that there will be 660 "Affordable" housing units created, but there is no information in the scoping document giving figures on what the applicant considers "affordable". However, to the NY Sun reporter, the applicant came up with some figures. According to The Sun, 100 apartments would be for people earning $21,000 a year which comes to $1,750 per month; 330 apartments would be for people earning $40,000 or $3,333 per month; 130 apartments would be for people earning $90,000 per year or $7,500 per month. An additional 100 apartments would be for some percentage of the normal income, whatever that is. Some people I know who are receiving only Social Security payments get less than $900 per month. So these apartments are not for them. Another new project, also labeled "affordable" ran an ad in the newspapers advertising rents in their project from a low of $1,993 for a one bedroom apartment to $2,392 per month for a two bedroom apartment.

The document talks about affordable housing, but never defines what they mean by "affordable". I'm sure many of the current residents of the area would not consider the above noted rents affordable.

On page 6 the applicant gives information on the number of buildings to be constructed for this project. However, I noted that the number of buildings shown on figure 4 does not match the text.

The scoping document discusses socioeconomic conditions, however, the applicant claims that indirect residential displacement is the only impact that is likely to require a detailed analysis. Much of this area is Manufacturing, so I would presume that the direct and indirect displacement of businesses in the immediate area and in the recently created Industrial Business Zone (IBZ) just to the North of the project would be even greater than the residential displacement. Manufacturing displacement, job loss and residential displacement need to be studied in a larger geographical context. We strongly

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recommend that the area include all of the area that was recently rezoned and the area inland up to this side of the Brooklyn Queens Expressway. In addition, there is no mention of any adverse effects of high performance standards on the existing manufacturers if they are down zoned from M3- Low performance standards to M1-High performance standards. There is an inadequate description of the existing industrial use groups that occupy the industrial parcels that the applicant want to downzone or whether the affected businesses could expand their operations under the new zoning. A good example of this is Acme Fish. DCP excluded the block occupied by Acme, and it remained M3-1, after Acme complained that they would become a non-conforming use.

Given the large number of new residents this project will bring into this relatively small site which formerly had 0 residents, since it was a manufacturing site, the scoping document only gives a passing glance at major issues. This site is on the riverside, yet nothing in the document goes into detail about the depth of the excavations necessary for buildings of the proposed height and bulk. There is no discussion of the fact that the applicant is proposing building over the water. A question has been raised as to whether the applicant owns the property underwater.

No information is given on the condition of the site for this level of construction other than to state that the platform, which is actually a dock topped with concrete, would have to be repaired and upgraded. Other agencies may require additional impact statements such as the Federal EPA.

I understand from some of the property owners in the immediate area that there is already a problem with overflow from the sewers during a heavy rain, yet this is not discussed at all, even thought there will be a huge increase in the sewer usage. Yesterday's heavy rainfall caused major flooding throughout Williamsburg and Greenpoint. I would like to point out that the sewers in this area are combined, sanitary and rain. A heavy rain could spew raw untreated waste onto the streets especially Kent Ave as it is a low point. The streets running perpendicular from Kent Ave are up-hill and even those properties experienced flooding.

At the present time in my area, the West Village, there is a major problem with the Sanitation Department. The City needs to put up a massive new facility to handle the garbage in the area which has had some new residential construction, but nothing near the scope of this proposed project. Yet, the scoping document never even mentions the need for new sanitation facilities. In addition, there is no mention that the BK 1 Sanitation Dept. facility is slatted to close and be moved to an as of yet undisclosed location as the recent rezoning mapped it as a park. This scoping document should also study the impact

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of additional sanitation truck runs from a distant location and the effect on the enlarged area we are requesting be studied.

There is also the question of community facilities necessary to handle this influx of new residents. There is no information on the schools in the area or on the actual number of children born after the last census. Using information from the 2000 census is inadequate, as almost all of the new residential growth and baby boom in the area happened after 2000. The applicants should survey the neighborhood door to door to adequately get enough information to discuss school seats at all levels of education from pre-school, day-care, elementary, middle and high school.

There is also no mention of how children would get to school given that Kent Avenue is the only major truck route in the area and services a large IBZ zone just to the north of the site. No routes to schools are given, nor is there a discussion of traffic in the area during the time children go and return from school or whether children would walk or use school buses.

The applicant is also silent on the inadequacy of the present depth of the sidewalk to accommodate large numbers of residents, children, baby carriages, small bikes etc. Although they propose curb cuts to allow for passenger and delivery drop offs they do not discuss how this is possible. There is also no mention of any proposed street trees and any other plantings to soften the out of scale building heights.

There is also a question about health care. I have been told that even, without this enormous increase in population, patients are often taken across the Williamsburg Bridge into Manhattan for medical treatment. Nothing in the scoping document mentions a possible deficiency in medical facilities available for these new residents.

The scoping document seems to indicate that shuttle buses will be used to cart people from the new housing to the subway lines. There should be information on how many buses would be needed, what routes they would take, the impact on traffic and whether they will be only used to ferry people to the L train on Bedford and the MJZ on Marcy and Broadway. If other subway or bus connections are being considered such as the Number 7 train, then the impact on the existing and new traffic in those areas needs to be studied as well.

From recent studies by the Department of Transportation and loud comments from current resident and subway passengers in the area, I hear that it is common to wait for three trains to get on the L train at Bedford and that overcrowded trains often bypass the Bedford Ave. station and run express from Lorimer to Union Square. Without any new

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residents from the large waterfront developments or the over 100 upland projects nearing completion, the L train runs at 103% of capacity.

Is the city planning to build another tunnel to accommodate additional train service within the next five years? In the meantime, how will people get around for their jobs, schools, necessary errands etc.?

The applicant gave no alternative plans – neither "as of right alternative that assumes the continuation of the existing M3-1 zoning" nor "other possible alternatives," even though this is required by the scoping document. In view of the large numbers of variances being requested there should be some alternatives explored in case the applicant does not get approval for each of the variances and permits that they are requesting.

Even if this were a small case, the applicant should have brought in alternative proposals. In this case, the applicant is requesting not only zoning changes but also a whole slew of other variances and special changes from even the sought after zoning. Certainly, the applicant should have brought in at least one, if not more alternative proposals. Oh yes, they did try to entice the owners of the adjacent industrial space to go along with the rezoning plan by suggesting an alternative down-zoning from M3-1 to residential.

When the DCP was working on the Park Slope Project they decided that 9 to 14 story towers would be "inconsistent with the neighborhood's low-rise, row house character." How can 30-40 story towers be consistent with the Domino sugar site and the low buildings on the adjacent blocks? The one mid-rise industrial building a block from the site was built in 1900, before any zoning regulations. Today, zoning regulations would not permit a building of similar bulk and height. In addition, this building would not conform to the contextual waterfront zoning plan.

Some additional information has surfaced comparing this project with Atlantic Yards and Parkchester. Referring to the Parkchester project, it was noted that, although the project is considered successful, prices for one-bedroom units have increased from $22,000 to $85,000 and two-bedroom units have increased from $35,000 to $135,000. Is this the price of success?

It is estimated that the New Domino would cost more than $400,000 per apartment, whereas other projects average out much less. One question raised by these figures is, how much subsidy will be provided for each affordable unit, and how does this compare to other projects.

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Another issue deals with construction related jobs. There is nothing stating that the project will be using union labor or if the immediate community will get some of the construction jobs. It was noted on several internet sites that The Katan Group,(who owns the fifty percent of the project) has a track record of using non-union labor. Will this be considered by City Agencies?

Apparently at least part of the reason the applicant wants the adjacent properties to be rezoned and all the other special permits is to eliminate the nearby waste transfer stations. It reminds me of many years ago when the WEST VILLAGE houses went up and tenants in one of the buildings came to complain about the truck terminal next door. I reminded them that the terminal had been there before them, and that they were really the inappropriate use.

In 7/1/04 New York Times article about this site, DCP was not backing this project, and in August the City was still saying it was committed to finding an industrial reuse for the site. Regina Myer, from the Brooklyn office stated, "We're not contemplating a rezoning for this site."

As recently as 2005 the City expressed its' interest in keeping the Domino site industrial even though Domino's closed. The applicant should have considered other uses of the site which would bring permanent jobs, affordable housing and additional tax revenue back to the community and New York City so that all of New York would benefit from the redevelopment and not just a few at the expense of others.

If the City is still committed to these goals, and would like to see an imaginative reuse of this site then our alternate plan should be studied and adopted, as we believe that it is less disruptive and would have a positive impact on the immediate and adjacent communities, and on all of Brooklyn, New York City and the State of New York.

This alternate plan will allow the development of a significant number of truly affordable housing apartments on the upland site and create thousands of new jobs for the community. The new jobs that will help mitigate the 3,000 jobs that the community lost in the recent rezoning.

Attached is a business case study for a Cultural Center to show the impace of a creative reuse of the entire waterfront site.