

July 30, 2007

Amanda Burden
Director
NYC Department of City Planning
22 Reade Street
New York, NY 10007

Dear Ms. Burden:

I am writing on behalf of the East Williamsburg Valley Development Corporation (EWVIDCO) to share our thoughts on the proposed development on the Domino Sugar Refinery site. Currently, EWVIDCO is responsible for providing business services to North Brooklyn's 1000 industrial businesses which employ over 15,000 individuals through the NYC Greenpoint-Williamsburg and North Brooklyn Industrial Business Zone and the North Brooklyn Empire Zone. EWVIDCO provides a variety of services to local businesses such as energy and tax benefits, informative seminars, financial and technical resources, and advocacy on behalf of local firms.

EWVIDCO supports the proposed construction of 660 affordable housing units, which amounts to 30% of the total number of residential units in the project. We support inclusion of these affordable units on the refinery property rather than alternate sites at other locations within Community Board one. We prefer that they be included within the development to ensure an economically diverse community and to reduce competitive pressure for real estate in other areas of the neighborhood. We urge that these units be constructed in the earliest phases of development, so that they can be available to low income families as soon as possible. Finally, we support public access to the waterfront at the refinery site, and urge the developer to construct this in the earliest phases of the project to ensure neighborhood residents full access to the waterfront.

We have a number of concerns about the proposed development, especially as it relates to the industrial businesses located in the immediate area, and just beyond the development site. The vast scale of the project will no doubt create traffic impacts that stretch beyond the development site and adjacent blocks. We are particularly concerned about the ability for trucks to continue to travel on Kent Avenue. Currently, Kent Avenue is a truck route that connects the southern portion of Williamsburg (Williamsburg Bridge, Brooklyn Navy Yard) to the northern section of Greenpoint. The firms in the northern portion of the neighborhood rely upon this thoroughfare for truck routing; it is conceivable that the new residents of the refinery development might not be supportive of 24-hour-a-day truck traffic rumbling outside of their windows. The potential impact on the continued flow of truck traffic must be taken into account as the scope of work is analyzed.

We are also concerned by the proposed rezoning of the upland parcels outside of the control of the developer from M3 to M1. Given the current light industrial use of the existing parcels, we question the necessity of this rezoning. Further, we find the alternative that proposes rezoning from M3 to MX unacceptable. As we learned from the Greenpoint Williamsburg rezoning in spring of 2005, we know that this will result in the displacement of businesses and it will substantially change the character of the neighborhood.

If you have any questions, please do not hesitate to contact me at 718-388-7287 x168.

Sincerely,

Leah Archibald
Associate Director, EWVIDCO

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