New York Industrial Retention Network

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Re: Testimony on the Draft Scope of Work
Domino Sugar Refinery Rezoning

Good afternoon. I am Jennifer Barrett, Research and Policy Associate at the New York Industrial Retention Network or NYIRN. For the past ten years, NYIRN has worked with government agencies and businesses throughout the five boroughs to ensure a place for industry in the City. I thank you for the opportunity to testify on the scope of work for the Domino Sugar Refinery.

NYIRN has reviewed Refinery LLC's scope of work for the Domino site and we applaud the inclusion of low-income and affordable housing units, public open space and community facilities. NYIRN would like to address the importance of retaining light industrial uses within the scope of work, and more specifically, the importance of keeping the upland area across Kent Street, the "non-project rezoning area," for light manufacturing.

Historically, the Domino site and surrounding blocks between the waterfront and Wythe Street have been dominated by industry. Currently, at least fifteen active industrial businesses, (or 130,000 SF of industrial space) exist within the development site and on adjacent blocks affected by the scope of work. In addition, there are eleven other businesses on the blocks immediately adjacent to the Domino site. Many of these businesses have been in existence since the 1950s and they currently employ more than 250 people.

Given the character of this area and the importance of industry to the City and the neighborhood, proposed rezonings on and around the Domino site should consider ways to maintain and support light industrial uses. Existing vacant parcels, equaling 50,000 SF of available land, provide a unique opportunity to create additional light manufacturing space that is designed to be compatible with new and existing residential, commercial and industrial uses. Therefore, the proposed rezoning of the "non-project rezoning area," blocks 2415, 2403 and 2390, to M1-2 should include provisions to ensure continued use for high-performance manufacturing. Furthermore, NYIRN strongly opposes the alternative rezoning of these blocks to mixed use (M1-4/R6A and M1-4/R6B) as presented on page 29 of the Scope of Work, which would hinder manufacturing uses.

NYIRN also asks that another alternative be considered for the "non-project rezoning area" along Kent Street. We recommend the creation of an Industrial Employment District (an IED), which would create a zoning overlay for an existing M-zoned area. An Industrial Employment District would ensure longevity for industrial businesses and would require special permits for other non-industrial uses such as superstores, hotels or offices, which are currently permitted in M-1 zones, but restricted in the M-3 areas. This would provide a land use designation essential to industry stability and job growth, and a place for industry that could not be removed by future administrations.

Manufacturing jobs are living wage jobs. Industry creates approximately 230,000 jobs city-wide, nearly half of which are in manufacturing. On average, annual incomes for manufacturing are $15,000 more than service-industry jobs, and manufacturing employs a diverse workforce: two-thirds of the people in the production workforce are immigrants, 80% are people of visible minorities, and 24% do not have a high school degree or equivalent. In Brooklyn Community District 1, 36% of the residents are employed in industrial sectors. More specifically, in the area around the Domino site (between Grand and S. 4th Streets and west of Driggs Avenue), 29% of residents are employed in industry; 75% of residents are visible minorities and 23% have less than a high school degree or equivalent. Retaining and increasing manufacturing jobs in and around the Domino site would offer long-term economic and employment opportunities to the immediate neighborhood.

Finally, the issue of traffic poses a challenge to the redevelopment of the Domino site. Kent Street is a major trucking route between the Williamsburg Bridge, the Brooklyn Navy Yard, southwest Brooklyn industrial zones and the Greenpoint-Williamsburg Industrial Business Zone and Industrial Ombudsman areas. As a major artery for heavy traffic, it poses a problem of compatibility and safety for future residents. Potential traffic problems must be closely considered in the Environmental Impact Study for the Domino site.

In closing, rezoning and changes to the neighborhoods of Williamsburg and Greenpoint have already limited the space available for light manufacturers. The Williamsburg-Greenpoint Industrial Business Zone and other IBZs in Brooklyn and throughout the city are full to capacity; vacancy rates for industrial space are lower than the vacancy rates for office space in Manhattan. Therefore, land use decisions on the Domino site will impact the character of the area and its industrial future.

Thank you for the chance to testify on this important project.