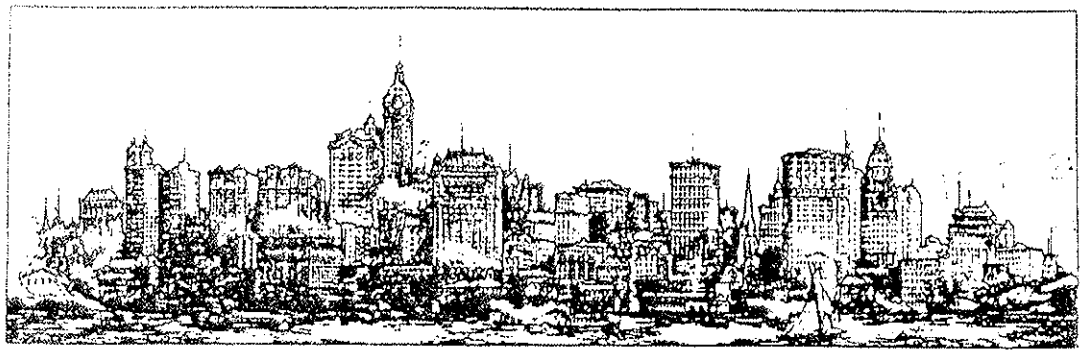

THE SOCIETY FOR THE ARCHITECTURE OF THE CITY

## Comments on the Draft Scope for the Proposed Domino Sugar Rezoning, 07DCP094K

**Environmental Assessment & Review Division, City Planning Commission Hearing, July 31, 2007**

The Society for the Architecture of the City is a small, all-volunteer historic preservation advocacy group based in Greenwich Village.

We question whether the draft scope complies with the *CEQR Manual* in its plan for assessing visual impacts on Historic Resources and on Urban Design/Visual Resources, because the proposed study areas seem to be inappropriately drawn, stopping respectively in the middle of the East River, and on the waterside boundary of the rezoned area—ignoring important public viewpoints on the bridges and the Manhattan shore.

We understand that the State Office of Historic Preservation finds the whole Domino complex and the Williamsburg Bridge to be State and National Register eligible. The city Landmarks Commission has calendared a portion of the Domino complex for designation.

In the Historic Resources section of the *Manual,* the "screening or elimination of publicly accessible views" and a "change in scale, visual prominence or visual context of any building, structure, or object or landscape feature" (*Manual,* Section 220, page 3F-6) are called out as requiring assessment. The study area for assessing such alteration of visual context and the elimination of views may be extensive. "Examples of situations for which a larger study area may be appropriate include: ...Actions that result in changes that are highly visible and can be perceived for farther than 400 feet *and* could affect the context of historic resources some distance away (e.g. changes to the skyline around Central Park). (*Manual,* Section 312, page 3F-7.)

Similarly, in the Urban Design/Visual Resources section, (*Manual,* Section 323.2 page 3G-5) "If the action blocks, partially or entirely, a view corridor", "if the views blocked are the ones essential to visual character in the area", "if the action changes urban design features so that a natural or built visual resource is no longer dominant in an area" there is an impact to be assessed. "If the proposed action would significantly affect the visual enjoyment of an historic resource" there is an impact. As to the study area: "where significant visual resources exist, **it may be appropriate to look beyond the land use study area to encompass views outside of this area**...from locations outside the study area (such as in instances where there are views to significant visual landmarks within the study area, such as the Williamsburg Bank in Brooklyn...) (*Manual,* Section 310, page 3G-2.)

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However, in the draft scope, the Historic Resources Study Area (Figure 11) uses the 400 foot perimeter boundary, and the Urban Design and Visual Resources Study Area (Figure 12) uses what it calls a "½ Mile Perimeter", which, however, takes the form of a semi-circle with the straight edge starting at the waterside edge of the re-zoning area and extending only inland, so that the study area on the Manhattan waterside is zero.

Both of these boundaries should be revised to include the numerous, extensive and important public viewpoints from the East River bridges and the Manhattan shoreline, which include parkland, as well as publicly accessible views looking south toward the site on both sides of the river. The broad and winding character of the East River makes the Domino site (and the Williamsburg Bridge) part of a panorama that can be enjoyed from an amazing number of public places. These viewpoints should be identified and included in the study area. Specifically, we find that the Domino complex can be seen from the Queensborough Bridge, the Williamsburg Bridge, the Manhattan Bridge, and the Brooklyn Bridge. It is visible from numerous points on the FDR Drive, and from the East River Park, as well as the northern tip of the Brooklyn Bridge Park. It is visible from the United Nations, and from the Detmold Park below Beekman Place, as well as the cross streets ending there and the Robert Moses Playground at 41st Street. This list is not exhaustive.

Such views are not only enjoyed by the public, they have been repeatedly chosen by artists as the subject of landscape paintings, etchings and engravings and photographs that celebrate our city. For instance, from our own neighborhood of Greenwich Village, the African-American artist Joseph Delaney painted the Williamsburg Bridge and the Domino site (Xerox attached) Many other examples exist, and should be considered.

Many of these viewpoints are heavily frequented by tourists who will lose the opportunity to appreciate what the State Office of Historic Preservation describes as "one of the most visually prominent and historically significant industrial sites on the East River Waterfront."

Alternatives to the proposed bulk and massing should be considered in view of the impact on historic resources and urban design. The EIS should include renderings of the site as it is proposed to be developed, not just in elevation, but from the affected viewpoints, and alternatives to this distribution of bulk should be considered.

Recently, a proposal for a tower next to the Brooklyn Bridge on the Brooklyn side, at 38 Water Street, was withdrawn in response to the public outcry at the desecration of the view. New Yorkers in every borough care about the views of their bridges and their landmarks, and the DEIS should give full consideration to the visual impacts of the current design and how they could be mitigated to preserve what Walt Whitman called the "democratic vistas" that are enjoyed by all New Yorkers.

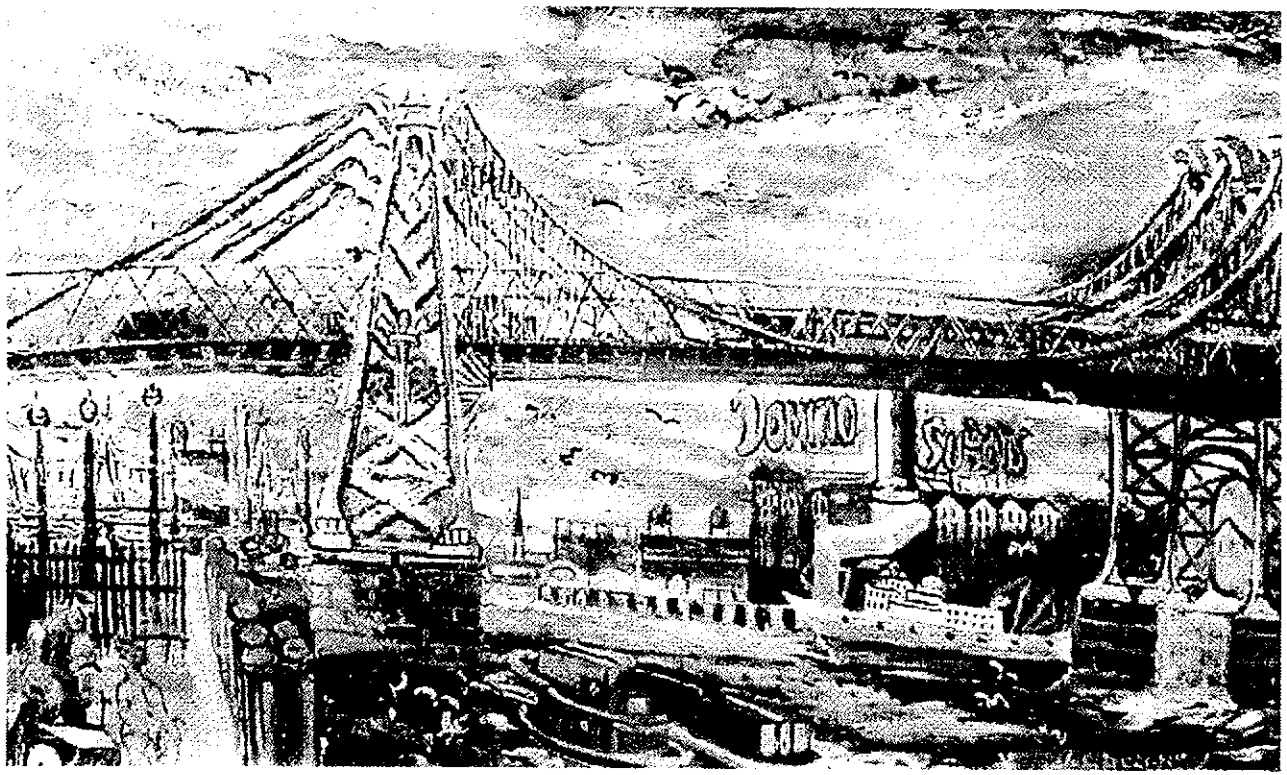
The erection, as proposed, of a 400 foot tower on the waterfront adjacent to the Williamsburg Bridge is unprecedented in terms of urban design. A comparable impact would have resulted from placing the existing Verizon Building in Manhattan on top of the FDR Drive directly beside the Brooklyn Bridge, instead of setting the tower inland and back from the bridge approach.

AKRF has been severely criticized for their methodology and conclusions in reviewing historic resources for the Williamsburg/Greenpoint EIS. The Municipal Art Society conducted a study of the area, which is available on their web site, finding that:

> The Municipal Art Society's Preservation Committee undertook this study because the Environmental Impact Statement (EIS) for the rezoning area failed to adequately address the historic fabric of the neighborhoods. Given the rich history of the area, we knew there were more buildings in the neighborhoods than were identified in that document. Beginning in December 2004, members of the Preservation Committee and of the community began a survey of the 184 blocks that the city proposed to rezone. Surveyors spent weekends walking the streets, taking photos. They later convened for discussions, guided by architectural historians, to determine the significance of the buildings. What follows is our list of the significant buildings and historic districts. We identified 264 significant buildings (including individual buildings and historic districts) that appear to be eligible for listing on the State and National Register and ought to have been included in the EIS.

The MAS study notes that the entire Domino Sugar complex was omitted from the list of eligible historic resources in the Greenpoint/Williamsburg EIS. "Although not located within the rezoning area, the buildings are within the 400-foot buffer and should have been included in the EIS." Since then, the New York City Landmarks Preservation Commission has calendared three of the Domino factory buildings, and the State Historic Preservation Office has determined that the entire complex is State and National Register eligible, along with the Williamsburg Bridge. It appears there is a substantial body of governmental, professional and civic opinion holding that AKRF erred in their assessment of the very same area that is the focus of the current EIS. Will the review methodology change? Will AKRF consult the SHPO when making eligibility decisions on other buildings in the study area?

The Grand Street ferry site, now a park beside the Domino complex, was a focus of early settlement in Williamsburg. Many small 19th century buildings survive in and near the rezoning area. The EIS should identify and map all buildings in the rezoning area (and the 400 foot buffer area) that were built before 1900, with special attention to those with a potential relationship to the earlier Havemeyer sugar refinery, including the Havemeyer and Elder Gas Works on South 4th Street between Wythe and Kent.

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| TITLE: | Lower Manhattan, East River - Domino Sugar |
| ARTIST: | Joseph Delaney |
| CATEGORY: | Paintings |
| MATERIALS: | oil on board |
| MARKINGS: | signed lower right |
| SIZE: | **h:** 24.5 x **w:** 39 in / **h:** 62.2 x **w:** 99.1 cm |