



**Neighbors Allied for Good Growth (NAG) and
Greenpoint Waterfront Association for Parks and Planning (GWAPP)
Testimony on Proposed Domino Development
Community Board 1, 11.21.2013**

Neighbors Allied for Good Growth (NAG) is a community-based organization that has been advocating for waterfront access, reduction of environmental hazards, and policy that promotes a healthy, mixed-use community in North Brooklyn since 1994. The Greenpoint Waterfront Association for Parks and Planning (GWAPP) is a community activist organization dedicated to education and outreach on issues affecting the environment, waterfront and neighborhoods of North Brooklyn. Along with other local organizations, we have been working to educate the community about this development and solicit comments from local residents. What follows are our comments based on our experience working in North Brooklyn and feedback from our neighbors.

In 2010, NAG opposed CPR's Domino rezoning plan because the proposed density was an unsustainable burden on our community and because the developer's promises, such as the development of 660 units of affordable housing, were not guaranteed. Despite our opposition, the rezoning was approved.

Now, a new developer – Two Trees Management – has acquired the property and proposes changes. The choice presented to the community is the previous flawed zoning with its unenforceable promises, or Two Trees' updated plan. While Two Trees' plan does not correct the central flaw of the density of the 2010 approval, we do commend Two Trees for actively reaching out to and working with the community in the process of this plan's development. We feel that Two Trees' plan is an improvement in many ways on CPR's. However, there is still opportunity to make it better. Two Trees and the City (which made commitments in 2010 that have not been fulfilled) need to make enforceable commitments to community benefits that will help to offset the extreme impact that this project will have on North Brooklyn. We recommend approval with modifications, as follows:

Affordable Housing

Today's most pressing concern in North Brooklyn, and particularly in Southside Williamsburg, is affordable housing. More than 20% of the Latino community of the Southside has been displaced from their neighborhood over the last 10 years, and this crisis only appears to be worsening. The affordable housing in this plan not only needs to be guaranteed, it needs to meet the needs of the current community.

Two Trees has stated multiple times that they will make an "enforceable commitment" to developing 660 units of affordable housing; however, this cannot be accomplished until the affordable housing mix is finalized. Once this happens, the City should guarantee the affordable housing in a restrictive declaration on the property. We learned our lesson from



CPCR, and need to ensure that if the property is flipped again, we don't lose this commitment.

Two Trees has stated that the mean AMI for its affordable units will be 70%. The average CB1 resident makes about 62% AMI, and the average resident of the Southside makes much less, under 40% AMI according to some reports. Only 15 units at 40% AMI will not meet the community's current needs. We encourage the City to work with Two Trees to provide the necessary subsidies to bring the qualifying income bands for the affordable housing down as much as possible.

Additionally, Two Trees is asking for two zoning text amendments related to affordable housing, both of which are of concern. The first would require only the residential portion of the development to be considered in determining the required square footage of housing to be developed under the City's inclusionary program. Because Two Trees proposes to build more commercial square footage than CPCR would have, this would result in a decrease of over 70,000 sq ft. of required affordable housing from the 2010 plan. While we want to support Two Trees' commitment to a mixed-used development, obviously a net loss of required affordable housing is not a positive outcome for the community. Two Trees should commit to building at least what is required under the IZ program, in addition to its discretionary commitments.

The second proposed text amendment would allow the developer to alter the affordability levels required by the inclusionary housing program. In general, allowing a developer to change zoning text to weaken inclusionary zoning on a case-by-case basis is a dangerous precedent to set citywide, especially at the same time that the incoming administration is dedicated to strengthening IZ. Our current regulations should be a baseline for affordability, not a ceiling. We encourage CB1, the Department of City Planning, and our Councilmember to analyze both these asks carefully.

Related to affordable housing is the issue of secondary displacement. Again, the Southside community is in crisis, and this development will only hasten the gentrification and associated displacement that this community has been experiencing. We encourage the City to undertake a separate action to expand the Anti-Harassment Zone, established in 2006 as a follow-up to the 2005 rezoning, to cover the entire Southside, and to strengthen its provisions for tenant protections. We also encourage Two Trees and the City to provide funding for tenant services through the Mobilization Against Displacement coalition, particularly for the groups that serve the Southside community.

Open Space

In general, Two Trees' open space plan looks to be a vast improvement on CPCR's. However, examining the numbers reveals that, although Two Trees says that they are creating almost two more acres of public open space than CPCR's plan would have, this



increase primarily includes streets, sidewalks, “private drives” and other “upland connections.” The gain of publicly accessible space is in fact only about 1 acre. Community members have expressed concern regarding public accessibility of this space, as much of the space will frequently be programmed with events. We encourage Two Trees to turn over control of the park space to the City Parks department; barring that, Two Trees should identify a community-based partner, or group of partners, to assist with open space programming, in order to ensure that it meets the current community’s needs.

Ultimately, Two Trees’ plan will slightly increase the per capita open space in the area, but it still remains below City standards. Toward this end, we encourage Two Trees and the City to financially support the community’s plan for the development of Williamsburg Bridge Park, near the Domino property on the waterfront. We have developed a prospectus for this with the Regional Plan Association, which we are happy to provide upon request. Two Trees and the City should also support development of other open spaces on the Southside.

Transportation

Two Trees estimates that, in full build-out, this project will bring 6,116 residents and 2,742 employees to the development. According to Two Trees, this translates to an increase of over 1700 subway trips in the morning and 2000 in the evening (over 600 more each than CPCR’s plan). Two Trees intends to provide shuttle bus service to the J and L trains. The L train is already particularly overcrowded.

We acknowledge that the developer has little control over the area’s public transit options, but we strongly urge the City to make good on its commitment to widening the Bedford Avenue station’s S3 stairway by two feet, as promised in the 2005 rezoning.

We also urge the City to commit to a comprehensive transportation study for all of Community District 1. CB1, NAG, GWAPP and others have repeatedly advocated for a comprehensive transportation study for North Brooklyn. This was a glaring need at the time of the 2005 rezoning, and it is even more so today. For an administration with such an impressive and progressive record on transportation issues, the lack of a comprehensive plan for a neighborhood undergoing such a radical shift from manufacturing to residential use is puzzling.

Additionally, we commend Two Trees for ensuring that the Brooklyn Waterfront Greenway route remains intact during construction, and hope to see the developer work with the Brooklyn Greenway Initiative to incorporate the greenway design into its final plans.

Environment

Given this project’s density and the associated impacts on our community’s infrastructure, we ask that the site design go beyond stormwater management and offset this new



combined flow via green infrastructure interventions wherever possible, cutting-edge water conservation within the buildings, and on-site treatment. The development must demonstrate how proposed design will not increase impact from floodwaters on neighboring properties and infrastructure.

Jobs

Two Trees' plan to create a mixed-used, 24-hour community is a positive step for North Brooklyn - NAG has long been an advocate of mixed-used development and walk-to-work jobs; in fact, the community has been advocating for mixed-use development since before 2005. We are excited for the potential of the commercial space to bring small manufacturers, cultural institutions, high-tech and green-tech firms, and other local businesses to the development.

However, particularly with tech firms and other such jobs coming to the neighborhood, we must ask – whom will these jobs benefit? According to the Census, Latinos make up less than 8% of people in NYC employed in the “information sector,” including film, radio, television, social media, and publishing. In 2011, according to Inc, only 25% of tech jobs were occupied by women. We encourage Two Trees and the City to fund job training programs for the community that teach the skills necessary for the high tech industry. We also encourage Two Trees to provide affordable space for artisans and artists, whose spaces in North Brooklyn have become increasingly unaffordable in recent years.

Conclusion

We would like to restate that we feel that this plan is in many ways preferable to CPR's. We understand that large-scale development at this site is, at this point, mostly inevitable. We look forward to working closely with Two Trees over the life of this project and hope that the developer and the City can work together to provide the community with the necessary benefits to mitigate the impact of this massive development.