

# THE VINEGAR HILL NEIGHBORHOOD ASSOCIATION

March 24, 2021

Re: 69 Adams Street (ULURP No. C200356 PPK)

**DELIVERED BY EMAIL - [landusetestimony@council.nyc.gov](mailto:landusetestimony@council.nyc.gov)**

Dear City Council Land Use Committee Members,

The Vinegar Hill Neighborhood Association votes NO to this ULURP application for the following reasons:

**1-The R-9/ M1-5 2001 rezoning was inappropriate at the time and led to subsequent upzonings including 85 Jay, Dock Street and 2009 upzoning of the Vinegar Hill part of DUMBO with unplanned infrastructure for the neighborhood, making it too dense, and dark.**

**2-NYCEDC is intent on selling the air rights to what is public space. This action continues to set the wrong initiative with limited scope of planning as well as setting a bad precedent for every municipal entity. To restore the Manhattan Bridge as a gateway through our neighborhood and to the river would show some vision for the future benefitting all residents, businesses and tourists. The irony is that the City is selling "air rights" currently occupied by DOT while they continue to occupy the spaces for industrial uses under every parcel under the Manhattan Bridge. DOT must consolidate the misuse of these parcels with the goal of moving to a more suitable location for their industrial uses and storage areas.**

**3-The site at 69 Adams was a low-rise building /property owned by the JWG; as of right they can build a 25 story building.**

**4-We are against the EDC selling "air rights" of the Manhattan Bridge (below the roadway) while the DOT continues to occupy the underbelly for storage and industrial needs that can be housed elsewhere.**

**5-The City wants to add a massive commercial component for the sale-18 million, only 13 million expected but not assured.**

**6-JWG left with one billion dollars of tax free, money on speculative land/ 18 million too little too late.**

**7- Compromising the Manhattan Bridge, a great historic resource**

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**8-York Street subway has only one means of egress. CB2 will not approve another ULURP in DUMBO/Vinegar Hill until the subway issue is rectified.**

**9- Renderings of this project leads the reviewer to believe that a public park is being created as part of the new development on Front Street right by the stone arch of the bridge as seen below. The truth is that the park on the rendering sits on the DOT property that is currently fenced in and is not part of the new development.**

**10-Misrepresentation of development-driven subway usage at hearings leads to no EIS study and thus, heightened safety risk at York Street Station. The York Street Station is at a breaking point. Adding density, and subway riders, to the neighborhood without any meaningful improvements is disgraceful. The York Street Station services about 4 million riders per year - a similar ridership to major stations like Queens Plaza station and the WTC/ Courtland Street. However, York Street has only 3 turnstiles, one platform and one exit - with no ADA access - when other stations handling similar volume have multiple exits, platforms, dozens of turnstiles and elevatored ADA access.**

**In conclusion and given the unanimous vote against the proposal, 34 against/zero for, by Community Board 2, as well as the disapproval with conditions of the application by the Borough President, we urge you to strongly oppose this application.**

**Yours truly**

**/s/ Aldona Vaiciunas**

**Aldona Vaiciunas**

**President-Vinegar Hill Neighborhood Association**

**57 Hudson Avenue**

**Brooklyn, New York 11201**

**cc: Council Member Stephen Levin**

**Kevin Riley, Chair**  
New York City Council  
Subcommittee on Landmarks, Public Sitings, and  
Dispositions  
250 Broadway  
New York, NY 10007

March 22, 2021

**Re: 69 Adams Street (ULURP No. C200356 PPK)**



*Thank you for the opportunity to send in testimony on behalf of the DUMBO Neighborhood Alliance. (DNA) DNA was founded in 1997 after founding members worked on a 197a for*

*the Old Brooklyn District including the neighborhoods of DUMBO, Vinegar Hill, NYCHA Farragut residents, Fulton Ferry. The City ignored the connectivity and segmented the neighborhoods from each other. DNA's advocacy led to the DUMBO Industrial Historic District on the State and National Registers in 2000, NYC's DUMBO Historic District in 2007 as well as the 2010 NYC's Loft Law rent stabilizing what was left of our artist's community and the rare affordable housing in DUMBO and in our historic district.*

**DNA is asking that the committee vote NO on the City's proposed sale of "unused development rights" to 69 Adams Street LLC/Rabsky Group for commercial use. No amount of money should be horse traded by NYCEDC for an inappropriate unplanned for development next to our most important historic resource, the Manhattan Bridge, the heart of DUMBO. The City lots do not = development rights.**

**Zoning is not planning.** The "as of right" R9 zoning is not suitable next to the Manhattan Bridge. Adding to it for a dollar amount speaks to the lack of planning in DUMBO regarding zoning and will leave an embarrassing and dangerous legacy. The City has had over 20 years to address the inaccessibility and the dangerous one entrance/egress at the York Street Station, the first F stop in Brooklyn that services the DUMBO, Vinegar Hill and Farragut neighborhoods and the ever-evolving Brooklyn Navy Yard, currently proposing a special district adding 3 new development sites. They already provide shuttle service to the subway as well as the MTA bus service to York ST. **DNA joins CB2 Land Use Committee: NO new ULURP actions should be considered until York Street subway station is resolved.**

Restoration of **Down Under Manhattan Bridge Overpass** has been long-term goal of DNA's and our community for 20 years. City owned lots should not be sold off or leased, or occupied for truck and storage use by DOT.

DNA asks that the "as of right" M1-5/R9-1 zoning for 69 Adams have the appropriate percentage of affordable units in keeping with Mandatory Inclusionary Housing guidelines. 69 Adams is captured in the 2001, one block rezoning M1-5/R9-1. This rezoning was a continuation of the piecemeal development in DUMBO following developer driven two block One Main rezoning displacing manufacturing for upscale residential and retail and the Washington Street rezoning, more of the same. The out of scale 2001 R-9 was a deeply uncharacteristic, insider developer up zoning, adjacent on all sides and smack up against the Manhattan Bridge. It's a bridge and the City is creating a tunnel effect. This one block rezoning became a catalyst for rampant developer driven, overdevelopment and rezoning without planning for the necessary the growth or infrastructure needs. The commercial corridor is inappropriate at this site adding too much extra density and is treacherously dangerous because of its immediate proximity to the bridge. The commercial bulk elevates the developer's value to the residential units, now starting on the 12<sup>th</sup> floor.

**There is already an over supply of vacant commercial spaces** and businesses are leaving DUMBO, many struggling before Covid, because of escalation of rents, real estate taxes and BID fees passed on to tenants; as well as the infrastructure of sewers, water main construction continuing to take place for the next 5 years because there of speculative practices and without comprehensive planning.

The first R-9 building in this rezoning, J Condo (bait and switch for the architecture firm ShoP for "Light Bridges") was not built until after 9/11. **At that time City Planning had the opportunity for a Follow Up Corrective Action (FUCA) because the Environmental Review was flawed and inherently still is.** For your information, below is a link to the 2001 rezoning, 69 Adams Street is included:  
<https://www1.nyc.gov/assets/planning/download/pdf/about/cpc/010725.pdf>

Buildings on York Street in our State and National Registers were razed for highrise towers. The heart of our historic district, the Manhattan Bridge remains an eyesore with DOT deeply rooted, inhabiting and enclosing every parcel. Zoning has sanitized DUMBO of its mixed-use neighborhood, loosing diversity but allowing DOT to occupy under overpass of the Manhattan Bridge and ironically having the only industrial use left in the neighborhood. The DNA has advocated for the restoration of Down Under Manhattan Bridge Overpass. Our historic resources are very important to our cultural city, our history speaking to our immigrant past. Removing DOT and using these spaces for public uses would enhance connectivity to downtown Brooklyn, our pedestrian, biking lanes on our bridges that take us to NYC, would access preexisting transportation, and would avoid privatizing and the destruction of our historic Belgian block public streets by the BID, create connectivity to our adjacent neighborhoods and could be the grand north entrance to Brooklyn Bridge Park. The DUMBO Neighborhood Alliance rejects the selling of the "air rights" while DOT continues to inhabit the very heart of DUMBO, degrading our historic district without respect for the very landmark that defines our historic district or plans to protect the residents and businesses already in our community, with any consideration for light & air quality, or quality of life.

The Department of Brooklyn City Planning aided the Jehovah's Witnesses Group through the up zoning of their properties, and the JWG left DUMBO with over a billion dollars untaxed dollars with the only benefit DNA was able negotiate in 2004 for the community was 7 million dollars for the refurbishment of Bridge Park 2, which is still not realized yet. The new developers who bought 85 Jay from the JWG have already built their massive building overshadowing the Manhattan Bridge and blocking all of the neighborhood's light. The many Jehovah Witness properties sold are now on NYC's tax roll. This ULURP is offensively inappropriate considering that point. The City is bad actor in brokering this deal.

Council Member Levin, during your tenure you were not able to stop the destruction of our important Belgian block streetscapes, or inappropriate uses under the Manhattan Bridge, listed in our designation report yet the contracts for street reconstruction are worth millions of dollars. This is not a once in a lifetime opportunity to get this money for planning for a subway entrance or the token giveback to neighboring communities. You are either naïve or purposely fooling yourself to create this narrative in your 12<sup>th</sup> year in office to justify this deal.

The F train needs a second entrance/egress. The DUMBO Neighborhood Alliance, DAC and the Vinegar Hill Neighborhood Association are on record to CB2 Transportation Committee to the MTA asking that immediate consideration be given to making the station safer in the interim by moving the turnstiles further away from the entrance or egress, create better lighting and it is not accessible. We have been ignored for over 2 years. It is laughably inexcusable to negotiate "money for a plan". The subway has to be remedied regardless of this ULURP. **Please VOTE NO to this ULURP.**

Sincerely,

Doreen Gallo  
Director, DUMBO Neighborhood Alliance

**From:** [Ivo Stranic](#)  
**To:** [Land Use Testimony](#)  
**Subject:** Dumbo Action Committee Testimony For 69 Adams ULURP  
**Date:** Thursday, March 25, 2021 3:40:32 PM

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Dear Councilmembers | Members of the Subcommittee on Landmarks, Public Sitings and Dispositions,

We write on behalf of the [Dumbo Action Committee](#), a group of over 600 Dumbo residents, in **strong opposition to the 69 Adams St Brooklyn ULURP** (ULURP application #200356PPK). As you know, this ULURP is concerning the sale of air rights by the City to Rabsky, the developer of 69 Adams. Based on the public hearing on March 22, every single member of the community is in opposition of this project, as is Community Board 2 and the Brooklyn Borough President. Our conclusion is that the cost to the community from added infrastructure strain and other issues far exceed the benefits that can be realized from the \$17 million price tag. In addition, the developer has acted in bad faith and misrepresented the project's size, impact, and benefits, which cannot be allowed to continue. We very much appreciate your consideration of the below when considering the approval of this ULURP.

Dumbo is a neighborhood already **beyond** full capacity. Over development, caused in no small part by poor zoning decisions, has been compounded by the City's failure to reassess Dumbo's zoning after significant new residential and commercial development and a huge increase in tourism.

Our taxed infrastructure simply cannot withstand more development. Dumbo's small streets are already overcrowded with cars, particularly during the summer months when tourists flock to the neighborhood. At times, it can take a car nearly an hour to go one block. Because the streets are narrow, should an ambulance or fire truck try to get through during these times the consequences could be devastating.

The most looming infrastructure issue in our neighborhood is that its primary subway station - York Street - is already dangerously clogged with people. The F Train at this station services Dumbo, Farragut Houses (NYCHA), and tourist traffic to Brooklyn Bridge Park and the Brooklyn Bridge pedestrian walkway. *It is also, notably, the closest station to the Navy Yard.* **The York Street Station services about 4 million riders per year - a similar ridership to major stations like Queens Plaza station and WTC / Cortlandt. However, York Street has only 3 turnstiles, one platform and ONE EGRESS - with no ADA access - when other stations handling similar volume have multiple exits, ample turnstiles and elevatored ADA access. Adding density, and subway riders, to the neighborhood without safety improvements to this station is nothing short of an accident waiting to happen. Furthermore, the MTA has stated that this station is extremely difficult to upgrade, so it is unlikely that the above issues will be resolved through capital spending by the MTA.** Consider also the data points and photos below:

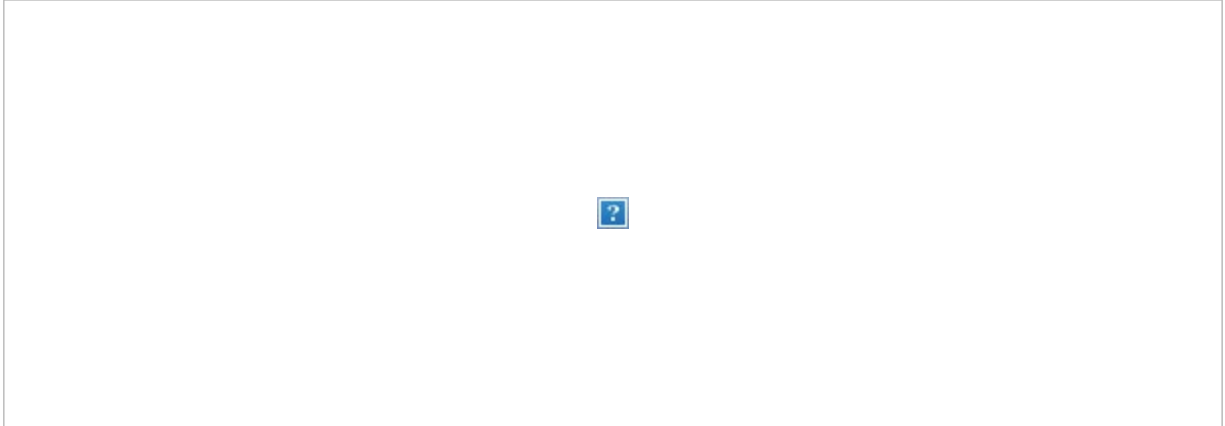
- The number of annual passengers at York Street grew from 2.8 million in 2014 to **almost 4 million in 2019** - a staggering **over 42% increase** (the 9<sup>th</sup> largest increase in the NYCTA system) - without ANY improvements to the station capacity.
- The number of annual passengers increased by **over 20%** in the last reported year (2018 to



2019). Since 2019, over 1,000 new residential units have been occupied or are currently in construction. All other stations with an increase in traffic of over 20% in a year have undergone major renovation work over the past 5 years.

- The NYPD has already shown it will not tolerate unsafe conditions as a result of overcrowding. It has shut down the York Street station during events in Dumbo that have swamped the platform.

Below are a few examples of the dangerous crowding of the York Street station:



Despite these needs, this ULURP application provides no meaningful or enforceable benefits to the community, most notably, the dire need for safety improvements to the York Street station. While suggested as such, **added commercial space is not a community benefit**. The accelerated commercial growth in the neighborhood and Navy Yard has already created significant pre-COVID commercial vacancies. Case in point, the neighboring Panorama (former Jehovah’s Witnesses) building sits completely empty with 635,000 sq ft of Class A commercial space. Additionally, the claims that Rabsky will hire locally is “smoke and mirrors” and is completely unenforceable. This development is not for a grocery store where hiring from the surrounding communities is easy (e.g., Wegmans in the Navy Yard). Rather, it is for anticipated creative and tech businesses that require very specific expertise from their workforce. The notion that this commercial development is going to create many new jobs for residents of Dumbo and the surrounding areas is laughable. If this sale were to proceed as proposed, it would be a clear example of the City favoring developers over communities.

Additionally, we request your consideration of the following items in review of this application.

**(1) We believe the air rights have been grossly undervalued, leaving \$60M+ of City revenue unrealized and setting unfavorable precedents**

- We strenuously object to the value that has been negotiated by the NYCEDC for the air rights that form the basis of this application. The community needs full transparency on how the price of \$18 million for the air rights was computed as well as any accompanying appraisal(s).
- The commercial air rights that are being considered under this ULURP application bring added value to the proposed development in three ways.

1. The value of the commercial space that is being developed.
2. The added value to the residential development:  
With the addition of the commercial base, all residential units are now above the 12<sup>th</sup> floor *and are above the bridge level*. The commercial pedestal not only eliminates the undesirable units that would be under or at the same level with the bridge at the rear half of the building but also eliminates the less desirable, lower floor street side units (with limited privacy and with no views.) In fact, the addition of the Commercial component pedestal, makes all the residential units extremely desirable and valuable with magnificent views above the surrounding buildings and bridge.
3. The added value of the permanent light and air easement afforded by the application.

- According to real estate comparables, the value to the development between the commercial component and the residential added value could easily be over \$80 million dollars.
- Further, we have serious questions about the RFP process surrounding the sale. The City released the RFP for sale of the air rights less than nine months after the purchase of the 69 Adams Street property by the developer. When was this RFP conceived? Did the developer have knowledge of the RFP prior to buying the property, perhaps “counting on it” to get an unfair advantage over other purchasers? Did the developer push for the RFP to be issued? Did perhaps the developer approach the City to purchase the air rights and the City decided to issue an RFP, which in essence is a smokescreen, to provide legitimacy to the process since the developer’s property would be the only eligible user of those air rights? There has been no transparency around this process. While the developer/applicant may be the only eligible user of the air rights, it does not negate the value of the air rights to them as it is their only way to substantially increase the value of their as-of-right investment. Developers would certainly be willing to pay far in excess of \$18 million for something that can **create more than \$80 million in value**. To be told that the sale does not net enough revenue for needed infrastructure improvements, when the “negotiation” was poorly handled (and perhaps even a sweetheart deal) is a grave disservice to Dumbo and New York City overall.

**(2) The renderings shared in public presentations are misleading to the public and reviewers**

- The application includes two renderings, which supposedly represent what it could build on 69 Adams as of right versus Rabsky’s proposal with the sale of the 98,000sf of air rights (see below taken right from the City Planning Commission hearing of Jan 20th 2021). These two renderings show buildings that are almost identical in bulk. Obviously, that is impossible as the building that includes the air rights is 254,000sf (or more than 60%) larger than the 159,000sf as-of-right building.



Graphical user interface, application, Word Description automatically generated



The real side-by-side comparison of the as of right versus the proposed building should look something like the marked-up image below. A clear depiction of the misrepresentations can also be seen on [this video](#) made by one of our Dumbo Action Committee members.



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We see this as an attempt by the developer to deceive the reviewer (in many cases, citizens without professional pedigrees in this area) into believing that the bulk of the building is the same one way or another, so the size of the building does not matter. *One wonders how none of the reviewers of the applicant at DCAS and their colleagues at EDC signed off on the material to*

*be shared with reviewers and the general public.*

- Further, the rendering leads the reviewer to believe that a public park is being created as part of the new development on Front Street right by the stone arch of the bridge as seen below. The truth is that the park on the rendering sits on the DOT property that is currently fenced in and is not part of the new development.

**(3) We question the application's characterization of development-driven subway usage that falls just under the threshold that would require an EIS study. Given the safety issues at the York Street subway station, this is a major concern.**

- The contemplated sale of commercial air rights will create enough office space for more than 600 office employees.
- Surely, the large majority of these employees will commute by transit (as highlighted in the application that points to the proximity of the location to the subway.)
- *Despite this, we heard in the CPC hearing that no Environmental Impact Study is required as part of the application because the estimated rush hour trips are under 200 (the application has total weekday PM commute trips at 278 with the subway trips falling just under the 200 number at 194). How can that be real when the provided capacity is for more than 600 employees and even the application itself speaks of more than 450 permanent jobs being created.*
- Further, there is no additional parking requirement attached to the air rights sale so no parking availability is provided to these up to 600 employees, which will certainly place even more pressure on the neighborhood's traffic and limited parking.

**In Conclusion:**

We have had several meetings with Councilmember Stephen Levin, who represents our district, to discuss the above. **Because we do not currently see a pathway to meaningful community benefits, most notably for safety improvements to the York Street subway, we have urged Councilman Levin to vote no.** We are already strained by as-of-right development, and we cannot accept any further expansion without binding commitments for significant infrastructure improvements. **Nor should the City be willing to accept this deal for a massively undervalued sale price.**

**Given all of the above facts and arguments, and, of course, given the unanimous vote against the proposal by Community Board 2, as well as the *Disapproval with Conditions* of the application by the Borough President, we urge you to vote NO on this proposal.**

Thank you for your consideration of this important matter.

Sincerely,

Mallory Kasdan (Co-Founder)

Melissa Prober (Co-Founder)

Suzanne Quint (Steering Committee)

*Dumbo Action Committee*

[dumboactioncommittee@gmail.com](mailto:dumboactioncommittee@gmail.com)

**From:** [192farragut@gmail.com](mailto:192farragut@gmail.com)  
**To:** [Land Use Testimony](#)  
**Subject:** 69 Adams St.  
**Date:** Wednesday, March 24, 2021 4:11:21 PM

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I am Mary Andrews, President of the Farragut Tenants Association. The Tenants Association for the benefit of Farragut Houses is against the rezoning regarding the land use at 69 Adams Street. This proposal to build commercial space will create congestion in an already overcrowded, packed York Street train station which for many, many years has been used by the Farragut community. Due to the increased development of Dumbo, non-community residents who park their cars and use the train to get to work, in addition to persons from the Navy Yard, York Street has become hazardous. The station has one entrance, one exit. Farragut has been overlooked and dismissed. We are surrounded by condos, tall buildings and new construction but never any benefit extended to our community. Jobs are always promised for new construction sites but they never materialize. We never receive the promised the job opportunities. We deserve the same quality of life as the investments that we are surrounded by. This rezoning falls under district 33, Council Member Steve Levin, however it has a tremendous impact on district 35, Farragut Houses under Council Member Laurie Cumbo. If this proposal passes with the 18 million, funding needs to go to the York Street station as well as some form of contribution to the Farragut Community, such as summer programs, teen programs, after school activities etc. We no longer want to watch everyone around us benefit while we receive nothing.

Thank You,  
Mary Andrews  
President Farragut Tenants Association  
Sent from [Mail](#) for Windows 10

**From:** [Stelene Rogakos](#)  
**To:** [Land Use Testimony](#)  
**Subject:** Fwd: 69 Adams Street, Dumbo, Brooklyn  
**Date:** Thursday, March 25, 2021 4:58:07 PM

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## **RE: 69 Adams street**

Honorable Chairperson, Councilmember, Members of the Landmarks and Dispositions Committee

Thank you very much for listening to my concerns at the hearing for the proposed sale of the air rights to the 69 Adams street project in DUMBO.

After hearing a lot of the other speakers, I would like to once again get on record with my thoughts related to the proposed disposition

### **York Street Station**

- The overwhelming majority of the speakers made the point and placed the City Council on notice that the station is dangerously overcrowded and lacks a critical second means of egress. When God forbid someone dies in this station in the future, the responsibility of the death will not lie with the developer that brought in hundreds more commuters to this station but to those who allowed the sale of the additional air rights to go through despite the warnings, empowering the developer to overbuild.
- No sale without a concrete commitment for a new entrance. We heard dozens of times during the presentation about the “ongoing dialogue” with the MTA but heard absolutely nothing about concrete results. Feasibility studies mean nothing. The EDC and the developer had two years to figure it out and have done nothing. Certainly, if the sale is allowed to go through the pressure will be off, the dialogue will die and nothing will happen.

### **Price.**

- EDC admitted on the record that the price of \$17.2 Million is 50% of the appraised value of the commercial value of the air-rights to be transferred.
- Obviously EDC has not taken into consideration any of the added value that the 10 story commercial podium adds to the as of right residential development by allowing apartments to start above the elevation of the bridge and the surrounding buildings, eliminating lower floor residences and providing all apartments with spectacular and views
- There was no mention of any consideration for the light and air easement that is part of the ULURP. That alone is worth the purchase price because it allows for a deeper and more efficient building than if the air rights were not transferred

- When asked about the price, the EDC representative ( minute 33) made the argument that the air rights were restricted to Commercial as if that was causing a reduction of their value? Why do that then ? Why restrict them at all? Allow the developer to use them for much needed affordable residential units. Or is Commercial what the developer is really looking for so he can avoid having residential apartments without views and noise and perhaps even more importantly avoiding having affordable housing within a luxury building and sharing the same high class amenities that he is planning to provide?

- The argument that the developer is the only possible buyer of the air rights is an empty argument. The true counter argument is that the city owns the only available air rights that he can buy and that the price / benefit to the city should commensurate the added value the air rights bring to the developer (estimated to be over 60 million)

- The presenters made references to use the proceeds towards

- Improvement at the York street station
- Capital expenses for the Farragut Houses
- Maintenance funding for the Farragut Houses
- Supporting the local public schools
- and that is after EDC getting their portion for “facilitating” the sale

Obviously at this price there is not enough money to go around and nothing of substance is going to happen in any front. So why sell?

- Selling out for \$17.2 Million is a giveaway, virtually a disposal and not a responsible disposition of a valuable asset.

**Lack of trust to developer and EDC** (the developer (and EDC) have not been forthcoming and trustworthy in the process)

- The rendering presented so far (they did not show them to the City Council) does not represent the truth. It was doctored to make it look like the as of right building and the 70% larger proposed building have practically the same bulk. Absurd misrepresentation
- Showed a park on the north side of the proposed building in the City Owned lot that is being

used by DOT to make their presentation more palatable

- We heard from Mr Williams of the Goose Tenant Group representing tenants of Rabski buildings in Bushwick about how CDC guidelines have been ignored in Rabski buildings, that rooftops were being rented for parties during COVID and the tenants were pleading with management to put up some CDC signs and follow protocol. Why would the city even deal with a developer who fails to follow basic health guidelines and reward him with the sale of such an asset at an admittedly bargain price and enable him to enhance the value of his property by paying a small fraction of his gain to buy these air rights.
- They never engaged with the community in any meaningful way and had an arrogant attitude at the Community Board hearings
- The Environmental Impact Study that they presented somehow shows that there is no need for further traffic study because miraculously the number of rush hour commuter trips generated falls less than 1% below the threshold that would require such a study. Well 1% sounds like within the margin of error of any study so why not do the study anyway to be sure especially given the state of the York street station?
- They are talking about retail on the ground floor that will open up to the street and provide continuity to the retail corridor on Front street. In reality they are providing less than 1,000 sf of retail (pls confirm) which maybe be enough for a small deli
- EDC misrepresented that DUMBO is lacking commercial space when there is 600,000 sf of available newly created commercial space (among others in the Jehovah's Witness buildings less than a couple of blocks away).
- EDC also misrepresented that there is no foot traffic during the day which is completely false
- EDC misrepresented that they have had many conversations with Community Board and Local Civic groups. Did they? If they did that apparently have not heard anyone or they do not care to take the feedback into consideration.

#### **DOT non commitment**

- There is absolutely no commitment from DOT on anything regarding giving up any of the properties they are occupying and so inefficiently using.
- Why are all the storage yards on the Brooklyn side of the bridges where the two bridges are



only a few blocks apart? Is DUMBO second class to Lower Manhattan? The other sides of the bridges should have their fair share of storage facilities

- Heard dozens of times from the supporters of the proposal and from Councilman Levin about ongoing talks with the DOT. The issue is very old and the project has been in the design phase for years. If the ongoing talks have not yielded a result so far they will certainly not yield any after the sale.
- Clear path and clear commitments to be made by DOT prior to sale approval.

### **New Hires Permanent jobs.**

- EDC represented that the sale of the air rights will create a pipeline of new permanent jobs by partnering with NYCHA REES and Local Tenant Associations. How many meetings have there been held with Local Tenant Associations to explore and encourage the local talent to the upcoming jobs?
- What specific commitments have been made for local and minority participation for permanent positions created by the commercial portion of the project?
- How is the tech sector or the developer providing training to the local talent so they can actually apply for the permanent positions the development will create?
- How is compliance going to be monitored?
- What happens if they do not meet the commitments?
- Is there a way to evict or otherwise penalize a tenant that is not meeting the goals?

### **Community Feedback**

The presenter around minute 27 of the hearing claimed on a slide that they listened to the Community Feedback and naming several entities as if they were supportive. For the record

- Community Board 2 **unanimously** opposed the proposed sale
- The Brooklyn Boro President after a public hearing recommended against the sale
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DUMBO Action Committee opposed the sale

- DUMBO Neighborhood Alliance opposed the sale
- The Farragut Stakeholders opposed the sale
- The Tenant Association for the Benefit of the Farragut house spoke against the sale
- There were more than a dozen residents of the neighborhood that spoke strongly and passionately against the proposal
- There was not even one token local resident that spoke for the proposal
- The DUMBO BID representative showed support but also concern and asked for other commitments for the neighborhood
- The speakers that spoke in favor of the sale are not actually representing DUMBO
  - The Brooklyn Chamber of Commerce
  - Downtown Brooklyn Partnership
  - 32BJ which by the way is not affected by the sale as its membership is employed primarily in residential buildings and there will be little or no member employed by the commercial portion of the project
  - The Carpenters union would hopefully get to build the much more “labor hungry” residential building anyway if the project was just built as of right and without the air rights.

In concussion echoing the community that has spoken loudly and clearly in every way that is available to it, I respectfully request from you our representatives to vote based on the community feedback and deliver a resounding NO to this proposal.

There is no rush to get to a decision here. Say no to this application, ask the developer to go back to the drawing board and come back with a real price and real community benefits. We will wait patiently for him and promise not to sell these air rights to anyone else.

Thank you very much for taking the time to review my comments

Sincerely

Stelene Rogakos