

A. INTRODUCTION

This chapter describes the alternatives identified for the Proposed Project and considered in the Environmental Impact Statement (EIS).

B. BACKGROUND

This chapter addresses six alternatives for the Proposed Project: Alternative 1 – No-Action Alternative; Alternative 2 – Rezoning Alternative; Alternative 3 – Non-Rezoning Alternative; Alternative 4 – Midblock Bulk Alternative; Alternative 5 – Rehabilitation and Infill Alternative; and Alternative 6 – No Significant Adverse Impacts Alternative. As discussed in more detail below, Alternatives 1, 2, 3, 4, and 5 are analyzed further in the EIS. Alternative 6 is described in this chapter, but for the reasons set forth below is not analyzed further in the EIS.

In general, alternatives selected for detailed analysis in an EIS are those that are feasible and reasonably satisfy the purpose and need for the project under consideration. In this case, the purpose and need for the Proposed Project, in brief, is to:

- Improve the quality of life and housing stability for existing Fulton and Elliott-Chelsea Houses (FEC) residents by constructing new Section 8 project-based vouchers (PBV)-dwelling units (DUs) in new buildings that would offer enhanced layouts, ventilation, energy efficiency, resident-controlled in-unit heating and cooling, new appliances in every apartment, common area amenities, large multipurpose community spaces, and resident rooftop space, while also preserving permanent affordability and residents' rights under the Permanent Affordability Commitment Together (PACT) program;
- Facilitate the construction of additional critically needed permanent affordable housing units, as well as market-rate housing that would financially support the PACT and affordable housing components of the Proposed Project; and
- Facilitate the development of commercial space and additional community facility space for the residents and the surrounding community.

The alternatives analysis is also used as a tool to select a Preferred Alternative by identifying both the benefits and the effects associated with each of the analyzed alternatives. The Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative are all under consideration for implementation of the Proposed Project. The Final EIS (FEIS) will identify the Preferred Alternative.

Alternative 1, the No-Action Alternative, which serves as a baseline for comparison of the effects of the other alternatives, would occur in the absence of the proposed discretionary approvals and implementation of the Proposed Project. This alternative assumes that existing uses, user

populations, and buildings on the Project Sites would remain and no new development would occur on the Project Sites by 2041 (the build analysis year for the Proposed Project).

The Rezoning, Non-Rezoning, and Midblock Bulk Alternatives (Alternatives 2, 3, and 4) are the alternatives under consideration for the implementation of the Proposed Project, because they would satisfy the project purpose and need. Under these alternatives, all existing residential and community facility uses would be replaced. The differences among these three alternatives are: (1) the amount of new (incremental) development that would occur, (2) the arrangement of the site plan and distribution of building bulk, and (3) whether such development would require discretionary land use approvals under the City's Uniform Land Use Review Procedure (ULURP). **Section C, "Alternatives Considered in the EIS,"** describes the three alternatives under consideration for the Proposed Project, as well as Alternative 1 (No-Action Alternative), Alternative 5 (Rehabilitation and Infill Alternative), and Alternative 6 (No Significant Adverse Impacts Alternative), which are not under consideration because they do not meet the purpose and need for the Proposed Project. **Chapter 01.0, "Purpose and Need for the Proposed Project,"** provides additional background information on the process that resulted in the identification of these alternatives.

Alternative 5, the Rehabilitation and Infill Alternative, is identified and assessed in this EIS in response to comments from Manhattan Community Board 4 and others on the Draft Scope of Work for the Preparation of an EIS (DSOW). These commenters requested that the EIS study an alternative consistent with the development proposal the PACT Partner identified in its response to a Request for Proposals (RFP) issued by the New York City Housing Authority (NYCHA) in April 2021. This development proposal entailed comprehensive renovation of existing NYCHA buildings on the Project Sites as part of the PACT Program and construction of one new residential building plus new infill spaces with commercial and community facility uses.

As discussed below, NYCHA and HPD have determined that the Rehabilitation and Infill Alternative would not meet the purpose and need for the Proposed Project because it would be financially and logistically infeasible. This alternative would not create enough market-rate housing to financially support the PACT and affordable housing components of the project (i.e., conversion of the existing NYCHA units to Section 8 PBV DUs and full renovation and ongoing maintenance of units and buildings). Also, renovations would not be able to address the various long-term deficiencies of the existing building structures and systems. This alternative also would not substantially increase the amount of new affordable housing at locations where opportunities for such increases exist. Nevertheless, to be responsive to comments on the DSOW, the Rehabilitation and Infill Alternative is described below and further analyzed in **Chapter 05.21, "Rehabilitation and Infill Alternatives Analysis."**

C. ALTERNATIVES CONSIDERED IN THE EIS

This section describes the alternatives for the Proposed Project that have been considered and whether they are going to be further evaluated in this EIS.

In order to provide a conservative analysis, each alternative indicates a development program (identified below) that reflects the maximum development program that would reasonably be

expected. For the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative, which each involve the replacement of all existing buildings, the PACT Partner has committed to a one-for-one replacement of all 2,056 existing NYCHA FEC DUs to Section 8 PBV DUs, as well as the replacement of existing community facility uses operated by Hudson Guild on a usable square foot (sf) basis (at a minimum) within the first newly constructed buildings on each Project Site (i.e., the Fulton 1 and Elliott-Chelsea 1 buildings). In addition, for the mixed-income residential, commercial (retail and supermarket¹), and other community facility (neighborhood center, daycare, and medical office) uses within these alternatives, the development programs reflect intended uses and represent a reasonable worst case in terms of the likely effects of the Proposed Project.

Alternative 1 – No-Action Alternative

The No-Action Alternative is intended to provide the lead, expert, and cooperating agencies with an assessment of the expected environmental impacts of no action on their part. It also establishes the context to assess and compare the environmental impacts among the alternatives. This alternative will be analyzed throughout the EIS.

The No-Action Alternative assumes that without the implementation of one of the Proposed Project's alternatives, the Project Sites would remain in their current condition, the existing buildings would not be replaced or demolished, and no new development would occur on the Project Sites. Additionally, major capital improvements, rehabilitation, or renovations subject to discretionary approvals such as the PACT rehabilitation program would not occur. Funding for renovations of NYCHA DUs as currently subsidized under Section 9 is dependent on allocation from the Federal government through annual Federal capital grants, which have historically declined and failed to keep pace with growing needs. For 2023, NYCHA received \$753 million in Federal capital grant funding for its entire inventory of public housing properties, which encompasses 2,411 buildings in 335 developments with 177,569 DUs across New York City. Of this \$753 million, only approximately 40 percent (or \$301 million) is available to be utilized for capital projects and improvements.

Under the No Action Alternative, the Project Site buildings would continue to be funded under the United States (US) Department of Housing and Urban Development (HUD)'s Section 9 program, limiting the ability to address capital needs in a different manner than they are currently addressed. As such, the underlying conditions confronting the aging buildings on the Project Sites would not be resolved and as such the No-Action Alternative does not meet the purpose and need for the Proposed Project.

Development Program

The existing conditions on the Project Sites, which are identical to the No-Action Alternative, are detailed in **Chapter 04.0, "Analysis Framework,"** specifically Section C, "Project Sites," and incorporated herein by reference. In summary, the No-Action Alternative includes 22 existing buildings, consisting of 17 residential apartment buildings, one mixed residential and community

¹ The inclusion of supermarket uses are indicative of what is planned and represents a conservative reasonable worst-case development scenario that will be identified as part of the development program throughout the EIS.

facility building, two community facility buildings, and two storage/maintenance garage buildings, ranging from 1 to 25 stories. The tallest on-site building is 232 feet tall. The Project Sites in No-Action Alternative would continue to include 2,056 NYCHA DUs, 56,859 gross square feet (gsf) of neighborhood center space, 10,300 gsf of daycare, and 95 accessory parking spaces. The community facility uses are operated by Hudson Guild, which is a community-based social services organization rooted in and primarily focused on the Chelsea neighborhood.

The EIS evaluates No-Action Alternative conditions in the 2041 analysis year without the Proposed Project, including other projects independent of the Proposed Project being constructed and/or operated within the same vicinity and time frame. These “No-Action projects” are described as part of the No-Action Alternative in **Chapter 05.01, “Land Use, Zoning, and Public Policy”** and include the “Maintenance and Operations Improvements at Fulton, Elliott, Chelsea, and Chelsea Addition Houses” project, as well as expected and in-progress developments and other changes in the surrounding areas that would affect the various impact category chapter study areas.

Alternative 2 – Rezoning Alternative

This alternative would require, in addition to NYCHA and HUD approvals, discretionary land use approvals from the City of New York through ULURP, which are expected to include zoning map and text amendments and a zoning special permit for a Large Scale General Development (LSGD). **Chapter 05.01** provides more details of these approvals in **Section E, “Environmental Effects”**. This alternative will be analyzed throughout the EIS.

Under the Rezoning Alternative, the staged demolition and replacement of all existing buildings, DUs, and community facility spaces on the Project Sites would take place. All existing NYCHA DUs would be replaced with Section 8 PBV DUs in new buildings through the PACT Program and would be set aside for existing NYCHA FEC residents. In addition, new mixed use, mixed income buildings would be constructed containing both market-rate and affordable housing DUs. The new affordable housing units would be provided pursuant to Mandatory Inclusionary Housing (MIH). As such, affordable housing could be provided at either 20, 25 or 30 percent of residential floor area depending on the levels of affordability. As applicable, the most conservative condition is considered in this EIS. Throughout the EIS, the amount of affordable housing DUs to be provided is conservatively assumed to be 30 percent of the total new (incremental) residential floor area in the mixed-income buildings. As a range of 20 to 30 percent of affordable housing DUs could be provided, the number of affordable housing DUs indicated represents an “up to” number.

Development Program

The Rezoning Alternative development program is presented in **Table 02.0-1a** for the Fulton Houses Project Site and in **Table 02.0-1b** for the Elliott-Chelsea Houses Project Site. **Table 02.0-1b** also includes a summary row showing the full program for the Rezoning Alternative on both Project Sites. Refer to **Figures 02.0-1a and 02.0-1b**, which show the Rezoning Alternative site plans for the Fulton Houses Project Site and the Elliott-Chelsea Project Site, respectively.

Table 02.0-1a: Rezoning Alternative, Fulton Houses Project Site

Name / No. Type Block Location				Dwelling Units						Gross Square Feet (GSF)							Height (max. building envelope)	
				Section 8 PBV DUs*	Mix Inc Bldg Affordable DUs	Subtotal, All Affordable DUs	Mix Inc Bldg Market Rate DUs	Mix Inc Bldg All DUs	Total, All DUs	Residential	Commercial	Community Facility	Neighborhood center	Daycare	Medical office related uses	Total gsf	Stories	Feet
Fulton 1	Replacement	717	9 Av, 19 St	204	0	204	0	0	204	231,398	1,413	0	12,229	0	0	245,040	12	145.40
Fulton 2	Replacement	716	9 Av, 18 St, 19 St	349	0	349	0	0	349	306,653	0	6,580	0	0	0	313,233	30	329.33
Fulton 3	Replacement	715	9 Av, 17 St, 18 St	391	0	391	0	0	391	342,562	4,811	0	2,420	0	0	349,793	36	385.50
Fulton 4	New Mxd Inc	715	17 St, 18 St	0	175	175	407	582	582	494,390	0	0	20,130	0	0	514,520	32	347.92
Fulton 5	New Mxd Inc	714	9 Av, 16 St, 17 St	0	158	158	369	527	527	448,230	10,500	0	5,810	0	0	464,540	34	368.25
Fulton 6	New Mxd Inc	714	17 St	0	88	88	206	294	294	249,700	0	0	6,080	0	0	255,780	23	262.25
Fulton 7	New Mxd Inc	715	17 St, 18 St	0	52	52	120	172	172	146,101	0	0	7,270	0	2,500	155,871	14	180.00
Fulton 8	New Mxd Inc	716	18 St, 19 St	0	64	64	149	213	213	181,390	0	0	0	9,770	0	191,160	17	221.58
Fulton Subtotals																		
1 to 3	Replacements	-		944	0	944	0	0	944	880,613	6,224	6,580	14,649	0	0	908,066		
4 to 8	New Mxd Inc's	-		0	537	537	1,251	1,788	1,788	1,519,811	10,500	0	39,290	9,770	2,500	1,581,871		
All Fulton Buildings				944	537	1,481	1,251	1,788	2,732	2,400,424	16,724	6,580	53,939	9,770	2,500	2,489,937		
Fulton Minimum Height																	12	145.40
Fulton Maximum Height																	36	385.50

Note:

* Section 8 PBV DUs reserved for existing NYCHA FEC residents. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.

Table 02.0-1b: Rezoning Alternative, Elliott-Chelsea Houses Project Site

Name / No. Type Block Location				Dwelling Units						Gross Square Feet (GSF)							Height (max. building envelope)	
				Section 8 PBV DUs*	Mix Inc Bldg Affordable DUs	Subtotal, All Affordable DUs	Mix Inc Bldg Market Rate DUs	Mix Inc Bldg All DUs	Total, All DUs	Residential	Commercial	Community Facility	Neighborhood center	Daycare	Medical office related uses	Total gsf	Stories	Feet
Elliott-Chelsea 1	Replacement	724	26 St, 27 Dr	452	0	452	0	0	452	453,291	0	0	49,770	7,266	0	510,327	39	428.50
Elliott-Chelsea 2	Replacement	724	10 Av, 26 St, 27 Dr	407	0	407	0	0	407	338,079	4,060	11,000	0	949	0	354,088	27	301.33
Elliott-Chelsea 3	Replacement	723	25 St, 26 St	253	0	253	0	0	253	214,945	0	0	6,648	0	11,285	232,878	22	257.33
Elliott-Chelsea 4	New Mxd Inc	723	10 Av, 25 St, 26 St	0	136	136	316	452	452	384,101	8,000	0	3,890	0	0	395,991	36	385.33
Elliott-Chelsea 5	New Mxd Inc	723	25 St, 26 St	0	98	98	228	326	326	276,755	0	0	8,400	0	0	285,155	28	312.33
Elliott-Chelsea 6	New Mxd Inc	723	26 St	0	127	127	295	422	422	358,471	0	0	10,200	0	0	368,671	32	346.33
Elliott-Chelsea 7	New Mxd Inc	724	26 St, 27 Dr	0	140	140	326	466	466	396,070	0	0	11,235	0	0	407,305	34	366.67
Elliott-Chelsea subtotals																		
1 to 3	Replacements			1,112	0	1,112	0	0	1,112	1,006,315	4,060	11,000	56,418	8,215	11,285	1,097,293		
4 to 7	New Mxd Inc's			0	501	501	1,165	1,666	1,666	1,415,397	8,000	0	33,725	0	0	1,457,122		
All Elliott-Chelsea Buildings				1,112	501	1,613	1,165	1,666	2,778	2,421,712	12,060	11,000	90,143	8,215	11,285	2,554,415		
Elliott-Chelsea Minimum Height																	22	257.33
Elliott-Chelsea Maximum Height																	39	428.50
Fulton Elliott-Chelsea Totals				2,056	1,038	3,094	2,416	3,454	5,510	4,822,136	28,784	17,580	144,082	17,985	13,785	5,044,352		

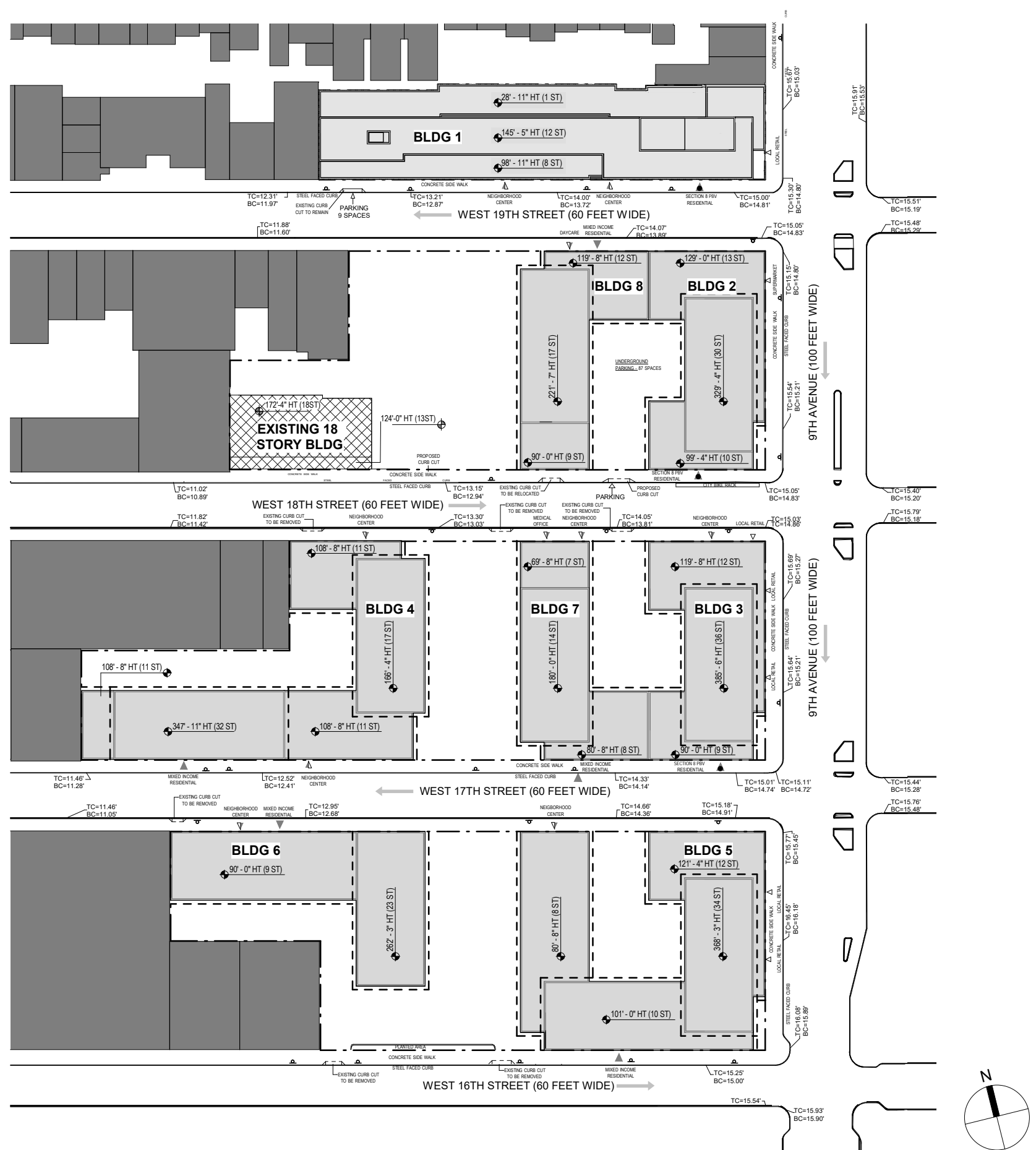
Note:

* Section 8 PBV DUs reserved for existing NYCHA FEC residents. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.



- LEGEND:
- - - Proposed Maximum Max Zoning Envelope
 - Proposed Preliminary Zoning Envelope
 - Development Envelope Height**
Illustrative Building Height (# of stories)
(Maximum Building Height in Feet Includes Bulkhead)
 - Illustrative Building Line
 - Existing Context Building
 - Mixed Income Residential Access Point
 - Commercial Access Point
 - Community Access Point
 - Spot Elevation/Height
(relative to NAVD88)
 - Proposed Building
 - Parking Access Point
 - Loading Access
(at loading berths)
 - Traffic Direction
 - NYCHA Property Boundary
 - Street Sign
 - Section 8 PBV Residential Access Point
 - Proposed Curb Cut
 - Existing Curb Cut
(to be relocated)
 - Existing Curb Cut
(to be maintained)

- Notes
1. Elevations referenced to North American Vertical Datum of 1988 (NVD88) which is 1.095 feet above National Geodetic Survey Datum at Sandy Hook, New Jersey.
 2. Building shown within zoning envelopes are for illustrative purposes only and are subject to change.
 3. Location of bulkheads illustrative and subject to change.
 4. Graphic scale applicable to all non-dimensioned elements.
 5. The landscape design of open space, including rooftop terraces, street network, and parking lots depicted are shown for illustrative purposes only and are subject to change.
 6. Entrances to proposed buildings are illustrative.
 7. For existing and proposed tree locations refer to "Landscape Plan".



Fulton and Elliott-Chelsea Houses Redevelopment Project

Figure 02.0-1a
Rezoning Alternative, Fulton Houses Site Plan



LEGEND:

Proposed Maximum Zoning Envelope

Proposed Preliminary Zoning Envelope

Development Envelope Height
Illustrative Building Height (# of stories)
(Maximum Building Height in Feet Includes Bulkhead)

Illustrative Building Line

Existing Context Building

Mixed Income Residential Access Point

Commercial Access Point

Community Access Point

Section 8 PBV Residential Access Point

Spot Elevation/Height
(relative to NAVD88)

Proposed Building

Parking Access Point

Loading Access
(at loading berths)

Traffic Direction

NYCHA Property Boundary

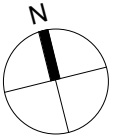
Street Sign

Proposed Curb Cut

Existing Curb Cut
(to be relocated)

Existing Curb Cut
(to be maintained)

- Notes
1. Elevations referenced to North American Vertical Datum of 1988 (NVD88) which is 1.095 feet above National Geodetic Survey Datum at Sandy Hook, New Jersey.
 2. Building shown within zoning envelopes are for illustrative purposes only and are subject to change.
 3. Location of bulkheads illustrative and subject to change.
 4. Graphic scale applicable to all non-dimensioned elements.
 5. The landscape design of open space, including rooftop terraces, street network, and parking lots depicted are shown for illustrative purposes only and are subject to change.
 6. Entrances to proposed buildings are illustrative.
 7. For existing and proposed tree locations refer to "Landscape Plan".



Fulton and Elliott-Chelsea Houses Redevelopment Project

Figure 02.0-1b

Rezoning Alternative, Elliott-Chelsea Houses Site Plan

The Rezoning Alternative would consist of a total of 15 new buildings ranging from 12 to 39 stories. For conservative analysis purposes, this EIS analyzes the tallest building heights (428.5 feet) as well as the largest bulk of the proposed buildings. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.

Net Increment of the Rezoning Alternative

Table 02.0-2 identifies the net incremental changes to the Project Sites under the Rezoning Alternative as compared to the No-Action Alternative.

Table 02.0-2: Rezoning Alternative Compared to No-Action Alternative

Land Use	No-Action Alternative	Rezoning Alternative	Increment
Existing NYCHA DUs	2,056	0	-2,056
Future Section 8 PBV DUs ¹	0	2,056	+2,056
MIH Affordable DUs ²	0	1,038	+1,038
Market-Rate DUs	0	2,416	+2,416
Total DUs	2,056	5,510	+3,454
Community facility/ Neighborhood Center gsf	56,859	144,082	+87,223
Daycare gsf	10,300	17,985	+7,685
Medical Office Related Uses gsf	0	13,785	+13,785
Local Retail gsf	0	28,784	+28,784
Supermarket gsf	0	17,580	+17,580
Total Building Area gsf	1.9 million	5.1 million	+3.2 million
Accessory Parking Spaces	95	96	+1
Building height (maximum)	232'	428.5'	+196.5'
Building stories (maximum)	25	39	+14

Notes:

¹ The Section 8 PBV DUs would be set aside for existing NYCHA residents and would replace the existing NYCHA DUs that would remain under the No-Action Alternative. As such, while the classification of these DUs would change, the population served and number of units would be the same as under the No-Action Alternative.

² Refer to Chapter 05.02, "Socioeconomic Conditions," for a description of MIH.

Temporary Relocations

Under the Rezoning Alternative, project construction staging is designed so that 94 percent of the Section 8 PBV DUs would be completed before the existing NYCHA DUs they replace are vacated, meaning that most existing FEC residents will remain in their current DUs until the replacement buildings are ready for occupancy. During the initial stage of project implementation and prior to construction of the replacement buildings, up to approximately 6 percent of current NYCHA residents—or 120 households from two of the existing 18 NYCHA buildings on the Project Sites²—would need to be temporarily relocated and their buildings vacated to facilitate the Proposed Project. They would be temporarily relocated either to appropriately sized vacant existing units in other buildings on the Project Sites or, if such units are unavailable, to housing units nearby. Additional information regarding the temporary relocation of these 120 households is provided in **Chapter 05.02**. Details about the sequencing of the construction staging for each of

² The existing Fulton 11 building at the Fulton Houses Project Site and Chelsea Addition at the Elliott-Chelsea Houses Project Site are the only two buildings in which residents be temporarily relocated prior to the construction of the replacement Section 8 PBV DUs.

the alternatives is provided in **Chapter 05.19, “Construction,”** specifically **Section C, “Construction Schedule,”** and **Section D, “Description of Construction Activities”**.

The John Lovejoy Elliott Center (hereafter referred to as the Elliott Center) community facility operated by Hudson Guild would also be temporarily relocated and temporary space(s) on- and off-site (identified and designed in coordination with the Hudson Guild leadership team) would be provided to house its existing programming, thereby ensuring minimal interruption of service during the construction of the Proposed Project.

The first replacement buildings on each Project Site, namely Fulton 1 and Elliott-Chelsea 1, once completed, will accommodate all temporarily relocated households. In addition, Fulton 1 and Elliott-Chelsea 1 would house all programming originally housed within the Elliott Center, as well as all existing Hudson Guild programming on the Project Sites.

Any temporary relocations of residents or businesses will be governed by requirements of applicable Federal, State, and local statutes and regulations. These include but are not limited to: the Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended (URA), and implementing regulations at 49 Code of Federal Regulations (CFR) 24, Notice H 2016-17; Office of Public and Indian Housing (PIH) 2016-17, as amended, and the corresponding HUD Notice H-2019-09 PIH 2019-2023 (HA) REV-4 (September 5, 2019) as may be further amended from time to time (RAD Fair Housing, Civil Rights, and Relocation Notice); HUD Notice PIH-2024-40 (HA), Demolition and/or Disposition of Public Housing Property, Eligibility for Tenant-Protection Vouchers, and Associated Requirements, (December 26, 2024) (Section 18); Section 18 of the US Housing Act of 1937, as amended and implementing regulation, 24 CFR part 970. A Temporary Relocation Plan for the 120 affected households and the Elliott Center will adhere to requirements of applicable Federal, State, and local statutes and regulations.³ As required by law, NYCHA and the PACT Partner will submit the Temporary Relocation Plan to HUD for their review and approval prior to construction of the Proposed Project. Refer to **Chapter 05.02** for additional information.

Alternative 3 – Non-Rezoning Alternative

Under the Non-Rezoning Alternative, similar to the Rezoning Alternative, all existing NYCHA DUs would be replaced by Section 8 PBV DUs in new buildings through the PACT Program and would be set aside for existing NYCHA FEC residents. In addition, mixed income buildings would be constructed containing both market-rate and affordable housing DUs. The affordability requirements under the Non-Rezoning Alternative for the proposed affordable DUs in the mixed-income buildings would be defined and required through legal agreements between NYCHA and the PACT Partner. While the specific percentage of affordable units has not been finalized, the percentage share of the new DUs that the Rezoning Alternative conservatively assumed to be affordable also applies to the Non-Rezoning Alternative (i.e., 30 percent). As a range of 20 to 30 percent of affordable housing DUs could be provided, the number of affordable housing DUs indicated represents an “up to” number. This alternative will be considered throughout the EIS.

³ For more information on the Temporary Relocation Plan, see **Chapter 05.02**.

The Non-Rezoning Alternative would not require any discretionary approvals by the City Planning Commission (CPC) pursuant to ULURP. It would utilize substantially all of the permitted floor area within the limits of the existing zoning in terms of permitted uses and building volumes. The potential need for a Mayoral Zoning Override (MZO)⁴ to facilitate the build out of the Non-Rezoning Alternative to, for example, address non-compliant interim conditions on the Project Sites due to the phasing of development is indicated as a potential required approval for this alternative.

Development Program

The Non-Rezoning Alternative development program is presented in **Table 02.0-3a** for the Fulton Houses Project Site and in **Table 02.0-3b** for the Elliott-Chelsea Houses Project Site. **Table 02.0-3b** also includes a summary row showing the total program for both Project Sites. Refer to **Figures 02.0-2a and 02.0-2b**, which show the Non-Rezoning Alternative site plans for the Fulton Houses Project Site and Elliott-Chelsea Houses Project Site, respectively.

The Non-Rezoning Alternative would include 17 new buildings ranging from 12 to 39 stories. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.

Net Increment of the Non-Rezoning Alternative

Table 02.0-4 identifies the net incremental changes to the Project Sites under the Non-Rezoning Alternative as compared to the No-Action Alternative.

Temporary Relocations

The Non-Rezoning Alternative is anticipated to require the same temporary relocations as described above for the Rezoning Alternative. Please see that text for information on how temporary relocations will be addressed.

⁴ An MZO is a discretionary action by the Mayor of the City of New York to allow relief or modification of certain zoning requirements.

Table 02.0-3a: Non-Rezoning Alternative, Fulton Houses Project Site

				Dwelling Units						Gross Square Feet (GSF)							Height (max. building envelope)		
	Type	Block	Location	Section 8 PBV DUs*	Mix Inc Bldg Affordable DUs	Subtotal, All Affordable DUs	Mix Inc Bldg Market Rate DUs	Mix Inc Bldg All DUs	Total, All DUs	Residential		Commercial		Community Facility				Stories	Feet
										Residential gsf	Local retail gsf	Supermarket gsf	Neighborhood center gsf	Daycare gsf	Medical office related uses gsf	Total gsf			
Fulton 1	Replacement	717	9 Av, 19 St	204	0	204	0	0	204	231,398	1,413	0	0	12,229	0	0	245,040	12	145.40
Fulton 2	Replacement	716	9 Av, 18 St, 19 St	212	0	212	0	0	212	180,170	0	7,400	0	0	0	0	187,570	20	236.00
Fulton 3	Replacement	715	9 Av, 17 St, 18 St	193	0	193	0	0	193	164,167	8,351	0	0	0	0	0	172,518	22	253.92
Fulton 4	Replacement	716	18 St, 19 St	179	0	179	0	0	179	152,026	0	0	1,980	3,206	2,500	0	159,712	18	215.67
Fulton 5	Replacement	715	17 St, 18 St	156	0	156	0	0	156	132,164	0	0	6,448	0	0	0	138,612	18	215.17
Fulton 6	New Mxd Inc	715	17 St	0	44	44	102	146	146	123,880	0	0	7,300	0	0	0	131,180	13	167.00
Fulton 7	New Mxd Inc	714	9 Av, 16 St, 17 St	0	121	121	282	403	403	342,329	11,911	0	8,469	0	0	0	362,709	23	265.75
Fulton 8	New Mxd Inc	715	17 St, 18 St	0	58	58	135	193	193	164,137	0	0	10,591	0	0	0	174,728	23	251.92
Fulton 9	New Mxd Inc	714	17 St	0	35	35	80	115	115	97,780	0	0	4,850	0	0	0	102,630	15	187.67
Fulton 10	New Mxd Inc	714	17 St	0	31	31	72	103	103	87,400	0	0	5,500	0	0	0	92,900	13	169.00
Fulton Subtotals																			
1 to 5	Replacements			944	0	944	0	0	944	859,925	9,764	7,400	20,657	3,206	2,500	0	903,452		
6 to 10	New Mxd Inc's			0	289	289	671	960	960	815,526	11,911	0	36,710	0	0	0	864,147		
All Fulton Buildings				944	289	1,233	671	960	1,904	1,675,451	21,675	7,400	57,367	3,206	2,500	0	1,767,599		
Fulton Minimum Height																		12	145.40
Fulton Maximum Height																		23	265.75

Note:

* Section 8 PBV DUs reserved for existing NYCHA FEC residents. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.

Table 02.0-3b: Non-Rezoning Alternative, Elliott-Chelsea Houses Project Site

				Dwelling Units						Gross Square Feet (GSF)							Height (max. building envelope)	
Name / No.	Type	Block	Location	Section 8 PBV DUs*	Mix Inc Affordable DUs	Subtotal, All Affordable DUs	Mix Inc Bldg Market Rate DUs	Mix Inc Bldg All DUs	Total, All DUs	Residential	Commercial		Community Facility				Stories	Feet
										Residential gsf	Local retail gsf	Supermarket gsf	Neighborhood center gsf	Daycare gsf	Medical office related uses gsf	Total gsf		
Elliott-Chelsea 1	Replacement	724	26 St, 27 Dr	452	0	452	0	0	452	453,291	0	0	49,770	7,266	0	510,327	39	428.50
Elliott-Chelsea 2	Replacement	724	10 Av, 26 St, 27 Dr	293	0	293	0	0	293	250,977	0	0	11,624	2,183	0	264,784	20	235.25
Elliott-Chelsea 3	Replacement	723	25 St, 26 St	175	0	175	0	0	175	150,371	0	0	10,649	0	9,546	170,566	17	208.00
Elliott-Chelsea 4	Replacement	723	25 St, 26 St	192	0	192	0	0	192	163,738	0	0	19,396	0	0	183,134	21	246.25
Elliott-Chelsea 5	New Mxd Inc	723	10 Av, 25 St, 26 St	0	89	89	206	295	295	250,342	0	0	8,840	0	0	259,182	21	247.17
Elliott-Chelsea 6	New Mxd Inc	723	25 St, 26 St	0	79	79	185	264	264	224,663	0	0	9,813	0	0	234,476	22	253.25
Elliott-Chelsea 7	New Mxd Inc	724	26 St, 27 Dr	0	79	79	185	264	264	224,438	0	0	7,548	0	0	231,986	21	252.92
Elliott-Chelsea subtotals																		
1 to 4	Replacements			1,112	0	1,112	0	0	1,112	1,018,377	0	0	91,439	9,449	9,546	1,128,811		
5 to 7	New Mxd Inc's			0	247	247	576	823	823	699,443	0	0	26,201	0	0	725,644		
All Elliott-Chelsea Buildings				1,112	247	1,359	576	823	1,935	1,717,820	0	0	117,640	9,449	9,546	1,854,455		
Elliott-Chelsea Minimum Height																	17	208.00
Elliott-Chelsea Maximum Height																	39	428.50
Fulton Elliott-Chelsea Totals				2,056	536	2,592	1,247	1,783	3,839	3,393,271	21,675	7,400	175,007	12,655	12,046	3,622,054		

Note:

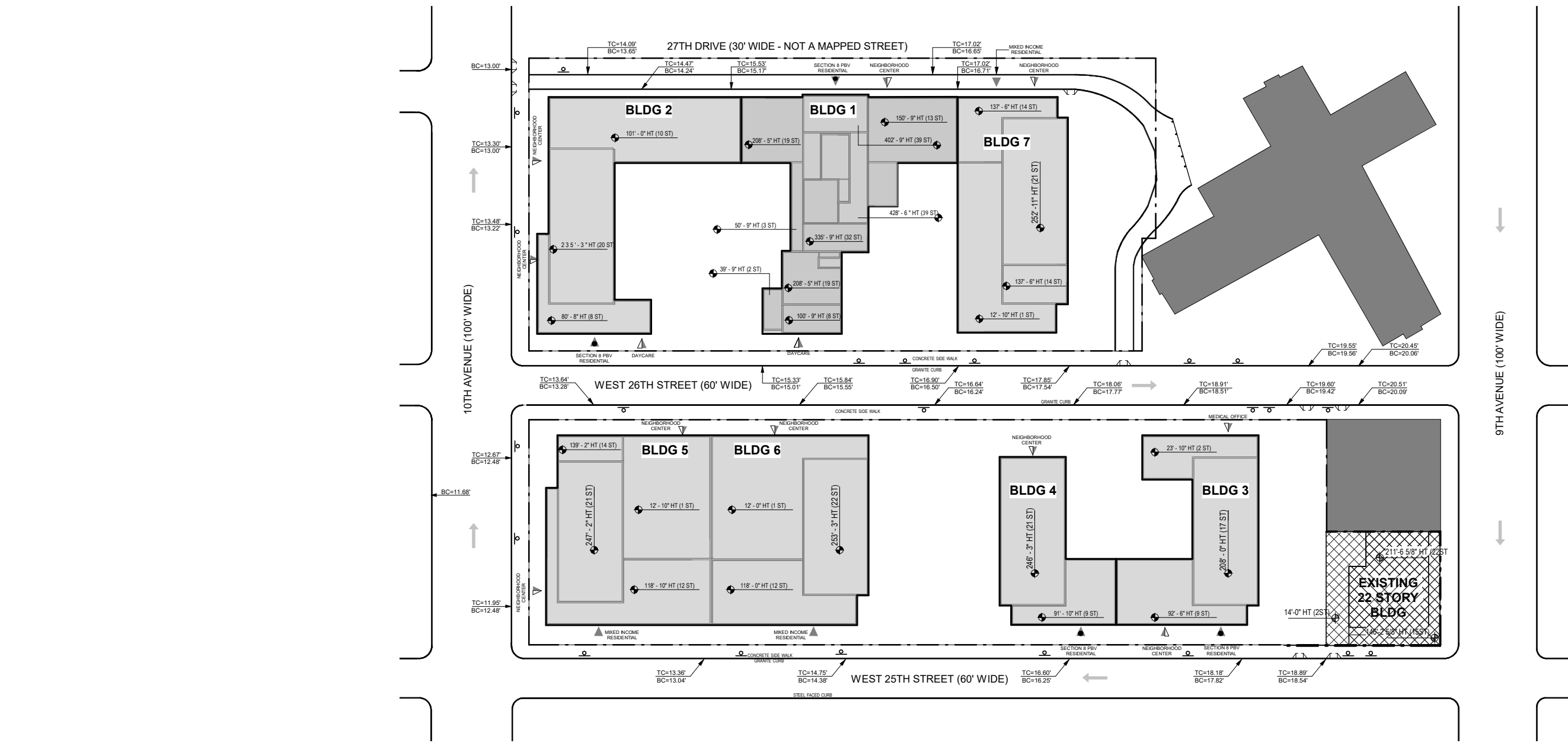
* Section 8 PBV DUs reserved for existing NYCHA FEC residents. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.



- LEGEND:**
- Proposed Preliminary Zoning Envelope
 - Development Envelope Height**
Illustrative Building Height (# of stories)
(Maximum Building Height in Feet Includes Bulkhead)
 - Illustrative Building Line
 - Existing Context Building
 - Mixed Income Residential Access Point
 - Commercial Access Point
 - Community Access Point
 - Spot Elevation/Height
(relative to NAVD88)
 - Proposed Building
 - Parking Access Point
 - Loading Access
(at loading berths)
 - Traffic Direction
 - NYCHA Property Boundary
 - Street Sign
 - Section 8 PBV Residential Access Point
 - Proposed Curb Cut
 - Existing Curb Cut
(to be relocated)
 - Existing Curb Cut
(to be maintained)

- Notes**
- Elevations referenced to North American Vertical Datum of 1988 (NVD88) which is 1.095 feet above National Geodetic Survey Datum at Sandy Hook, New Jersey.
 - Building shown within zoning envelopes are for illustrative purposes only and are subject to change.
 - Location of bulkheads illustrative and subject to change.
 - Graphic scale applicable to all non-dimensioned elements.
 - The landscape design of open space, including rooftop terraces, street network, and parking lots depicted are shown for illustrative purposes only and are subject to change.
 - Entrances to proposed buildings are illustrative.
 - For existing and proposed tree locations refer to "Landscape Plan".





LEGEND:

	Proposed Preliminary Zoning Envelope		Spot Elevation/Height (relative to NAVD88)		Traffic Direction		Proposed Curb Cut
	Development Envelope Height		Proposed Building		NYCHA Property Boundary		Existing Curb Cut (to be relocated)
	Illustrative Building Height (# of stories) (Maximum Building Height in Feet Includes Bulkhead)		Parking Access Point		Street Sign		Existing Curb Cut (to be maintained)
	Illustrative Building Line		Loading Access (at loading berths)				
			Mixed Income Residential Access Point				
			Commercial Access Point				
			Community Access Point				
			Section 8 PBV Residential Access Point				

Notes

- Elevations referenced to North American Vertical Datum of 1988 (NVD88) which is 1.095 feet above National Geodetic Survey Datum at Sandy Hook, New Jersey.
- Building shown within zoning envelopes are for illustrative purposes only and are subject to change.
- Location of bulkheads illustrative and subject to change.
- Graphic scale applicable to all non-dimensioned elements.
- The landscape design of open space, including rooftop terraces, street network, and parking lots depicted are shown for illustrative purposes only and are subject to change.
- Entrances to proposed buildings are illustrative.
- For existing and proposed tree locations refer to "Landscape Plan".

Fulton and Elliott-Chelsea Houses Redevelopment Project

Figure 02.0-2b

Non-Rezoning Alternative, Elliott-Chelsea Houses Site Plan

Table 02.0-4: Non-Rezoning Alternative Compared to No-Action Alternative

Land Use	No-Action Alternative	Non-Rezoning Alternative	Increment
Existing NYCHA DUs	2,056	0	-2,056
Future Section 8 PBV DUs*	0	2,056	+2,056
Affordable DUs	0	536	+536
Market-Rate DUs	0	1,247	+1,247
Total DUs	2,056	3,839	+1,783
Community facility/ Neighborhood Center gsf	56,859	175,007	+118,148
Daycare gsf	10,300	12,655	+2,355
Medical Office Related Uses gsf	0	12,046	+12,046
Local Retail gsf	0	21,675	+21,675
Supermarket gsf	0	7,400	+7,400
Total Building Area gsf	1.9 million	3.6 million	+1.7 million
Accessory Parking Spaces	95	96	+1
Building height (maximum)	232'	428.5'	+196.5'
Building stories (maximum)	25	39	+14

Note:

* The Section 8 PBV DUs would be set aside for existing NYCHA FEC residents and would replace the existing NYCHA DUs that would remain under the No-Action Alternative. As such, while the classification of these DUs would change, the population served and number of units would be the same as under the No-Action Alternative.

Alternative 4 – Midblock Bulk Alternative

As noted above, the Midblock Bulk Alternative was developed in response to comments received on the DSOW. This alternative would have the same development program as the Rezoning Alternative but would differ in terms of the arrangement of bulk (i.e., the geographic distribution of buildings, building heights and setbacks, and open areas) on the Fulton Houses Project Site. While both alternatives would result in new high-rise buildings, under the Rezoning Alternative the tallest buildings would be located along 9th Avenue and under the Midblock Bulk Alternative the tallest buildings would be located in midblock areas. The arrangement of bulk on the Elliott-Chelsea Houses Project Site for the Midblock Bulk Alternative would be identical to the Rezoning Alternative. This alternative will be analyzed throughout the EIS.

To facilitate development of the Midblock Bulk Alternative, NYCHA and the PACT Partner would seek the same discretionary land use approvals from the City of New York as those anticipated for the Rezoning Alternative. These are anticipated to include zoning map and text amendments and an LSGD zoning special permit. **Chapter 05.01** provides more details of these approvals in **Section E, “Environmental Effects,”** and that information is incorporated herein by reference.

Under the Midblock Bulk Alternative, the staged demolition and replacement of all existing buildings, DUs, and community facility spaces on the Project Sites would take place. All existing NYCHA DUs would be replaced by Section 8 PBV DUs in new buildings through the PACT Program and would be set aside for existing NYCHA FEC residents. In addition, new mixed income buildings would be constructed containing both market-rate and affordable housing DUs. The new affordable housing units would be provided pursuant to MIH. As under the Rezoning Alternative, the amount of affordable housing DUs to be provided is conservatively assumed to be 30 percent of the total new (incremental) residential floor area in the mixed-income buildings (refer

to the above discussion of the Rezoning Alternative for more information). As a range of 20 to 30 percent of affordable housing DUs could be provided, the number of affordable housing DUs indicated represents an “up to” number.

Development Program

The Midblock Bulk Alternative development program is presented in **Table 02.0-5a** for the Fulton Houses Project Site and in **Table 02.0-5b** for the Elliott-Chelsea Houses Project Site. **Table 02.0-5b** also includes a summary row showing the total program for the Project Sites. Refer to **Figures 02.0-3a and 02.0-3b**, which show the Midblock Bulk Alternative site plans for the Fulton Houses Project Site and Elliott-Chelsea Houses Project Site, respectively.

The Midblock Bulk Alternative would consist of a total of 16 new buildings ranging from 12 to 39 stories. For conservative analysis purposes, this EIS analyzes the tallest building heights (428.5 feet) as well as the largest bulk of the proposed buildings. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.

Net Increment of the Midblock Bulk Alternative

Table 02.0-6 identifies the net incremental changes to the Project Sites under the Midblock Bulk Alternative as compared to the No-Action Alternative.

Temporary Relocations

The Midblock Bulk Alternative is anticipated to require the same temporary relocations as described above for the Rezoning Alternative. Please see that text for information on how temporary relocations will be addressed.

Table 02.0-5a: Midblock Bulk Alternative, Fulton Houses Project Site

				Dwelling Units						Gross Square Feet (GSF)							Height (max. building envelope)	
										Residential	Commercial		Community Facility			Total gsf		
Name / No.	Type	Block	Location	Section 8 PBV DUs*	Mix Inc Affordable DUs	Subtotal, All Affordable DUs	Mix Inc Bldg Market Rate DUs	Mix Inc Bldg All DUs	Total, All DUs	Residential gsf	Local retail gsf	Supermarket gsf	Neighborhood center gsf	Daycare gsf	Medical office related uses gsf		Stories	Feet
Fulton 1	Replacement	717	9 Av, 19 St	204	0	204	0	0	204	231,398	1,413	0	12,229	0	0	245,040	12	145.40
Fulton 2	Replacement	716	9 Av, 18 St, 19 St	297	0	297	0	0	297	256,796	0	6,580	0	0	0	263,376	25	283.67
Fulton 3	Replacement	715	17 St	443	0	443	0	0	443	392,430	0	0	20,178	0	0	412,608	37	399.92
Fulton 4	New Mxd Inc	715	9 Av, 17 St, 18 St	0	87	87	204	291	291	247,350	8,311	0	0	0	0	255,661	25	281.00
Fulton 5	New Mxd Inc	714	9 Av, 16 St, 17 St	0	135	135	314	450	449	382,500	7,000	0	5,508	0	0	395,008	25	280.92
Fulton 6	New Mxd Inc	714	17 St	0	83	83	191	273	274	232,050	0	0	4,109	0	0	236,159	23	262.33
Fulton 7	New Mxd Inc	715	17 St, 18 St	0	80	80	188	268	268	227,800	0	0	3,236	0	2,500	233,536	28	309.00
Fulton 8	New Mxd Inc	716	18 St, 19 St	0	76	76	178	254	254	215,900	0	0	0	9,770	0	225,670	27	301.25
Fulton 9	New Mxd Inc	715	17 St, 18 St	0	76	76	176	252	252	214,200	0	0	8,679	0	0	222,879	21	243.61
Fulton Subtotals																		
1 to 3	Replacements	-		944	0	944	0	0	944	880,624	1,413	6,580	32,407	0	0	921,024		
4 to 9	New Mxd Inc's	-		0	537	537	1,251	1,788	1,788	1,519,800	15,311	0	21,532	9,770	2,500	1,568,913		
All Fulton Buildings				944	537	1,481	1,251	1,788	2,732	2,400,424	16,724	6,580	53,939	9,770	2,500	2,489,937		
Fulton Minimum Height																	12	145.40
Fulton Maximum Height																	37	399.92

Note:

* Section 8 PBV DUs reserved for existing NYCHA FEC residents. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.

Table 02.0-5b: Midblock Bulk Alternative, Elliott-Chelsea Houses Project Site

Name / No. Type Block Location				Dwelling Units						Gross Square Feet (GSF)							Height (max. building envelope)		
				Section 8 PBV DUs*	Mix Inc Bldg Affordable DUs	Subtotal, All Affordable DUs	Mix Inc Bldg Market Rate DUs	Mix Inc Bldg All DUs	Total, All DUs	Residential gsf	Commercial		Community Facility			Total gsf	Stories	Feet	
											Local retail gsf	Supersmarket gsf	Neighborhood center gsf	Daycare gsf	Medical office related uses gsf				
Elliott-Chelsea 1	Replacement	724	26 St, 27 Dr	452	0	452	0	0	452	453,291	0	0	49,770	7,266	0	510,327	39	428.50	
Elliott-Chelsea 2	Replacement	724	10 Av, 26 St, 27 Dr	407	0	407	0	0	407	338,079	4,060	11,000	0	949	0	354,088	27	301.33	
Elliott-Chelsea 3	Replacement	723	25 St, 26 St	253	0	253	0	0	253	214,945	0	0	6,648	0	11,285	232,878	22	257.33	
Elliott-Chelsea 4	New Mxd Inc	723	10 Av, 25 St, 26 St	0	136	136	316	452	452	384,101	8,000	0	3,890	0	0	395,991	36	385.33	
Elliott-Chelsea 5	New Mxd Inc	723	25 St, 26 St	0	98	98	228	326	326	276,755	0	0	8,400	0	0	285,155	28	312.33	
Elliott-Chelsea 6	New Mxd Inc	723	26 St	0	127	127	295	422	422	358,471	0	0	10,200	0	0	368,671	32	346.33	
Elliott-Chelsea 7	New Mxd Inc	724	26 St, 27 Dr	0	140	140	326	466	466	396,070	0	0	11,235	0	0	407,305	34	366.67	
Elliott-Chelsea subtotals																			
1 to 3	Replacements			1,112	0	1,112	0	0	1,112	1,006,315	4,060	11,000	56,418	8,215	11,285	1,097,293			
4 to 7	New Mxd Inc's			0	501	501	1,165	1,666	1,666	1,415,397	8,000	0	33,725	0	0	1,457,122			
All Elliott-Chelsea Buildings				1,112	501	1,613	1,165	1,666	2,778	2,421,712	12,060	11,000	90,143	8,215	11,285	2,554,415			
Elliott-Chelsea Minimum Height																		22	257.33
Elliott-Chelsea Maximum Height																		39	428.50
Fulton Elliott-Chelsea Totals				2,056	1,038	3,094	2,416	3,454	5,510	4,822,136	28,784	17,580	144,082	17,985	13,785	5,044,352			

Note:

* Section 8 PBV DUs reserved for existing NYCHA FEC residents. All heights indicated for new buildings are for the maximum building envelope, including up to 40 feet of rooftop mechanical bulkheads.



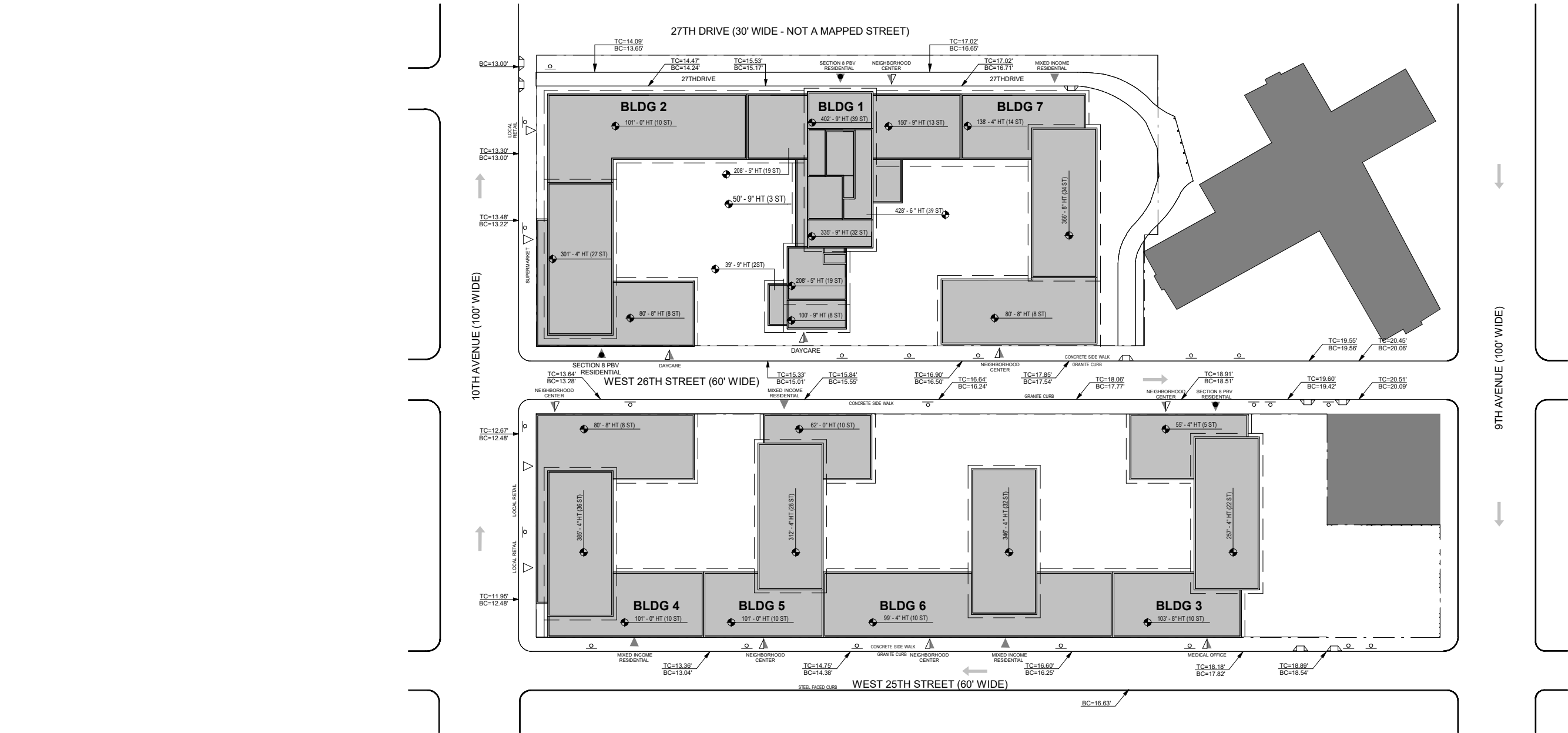
- LEGEND:
- - - Proposed Maximum Max Zoning Envelope
 - Proposed Preliminary Zoning Envelope
 - Development Envelope Height**
Illustrative Building Height (# of stories)
(Maximum Building Height in Feet Includes Bulkhead)
 - Illustrative Building Line
 - Existing Context Building
 - Mixed Use Residential Access Point
 - Commercial Access Point
 - Community Access Point
 - Spot Elevation/Height
(relative to NAVD88)
 - Proposed Building
 - Parking Access Point
 - Loading Access
(at loading berths)
 - Traffic Direction
 - NYCHA Property Boundary
 - Street Sign
 - Section 8 PBV Residential Access Point
 - Proposed Curb Cut
 - Existing Curb Cut
(to be relocated)
 - Existing Curb Cut
(to be maintained)

- Notes
1. Elevations referenced to North American Vertical Datum of 1988 (NVD88) which is 1.095 feet above National Geodetic Survey Datum at Sandy Hook, New Jersey.
 2. Building shown within zoning envelopes are for illustrative purposes only and are subject to change.
 3. Location of bulkheads illustrative and subject to change.
 4. Graphic scale applicable to all non-dimensioned elements.
 5. The landscape design of open space, including rooftop terraces, street network, and parking lots depicted are shown for illustrative purposes only and are subject to change.
 6. Entrances to proposed buildings are illustrative.
 7. For existing and proposed tree locations refer to "Landscape Plan".



Fulton and Elliott-Chelsea Houses Redevelopment Project

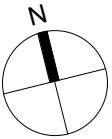
Figure 02.0-3a
Midblock Bulk Alternative, Fulton Houses Site Plan



LEGEND:

- | | | | | |
|--|--|--|-------------------------|--------------------------------------|
| Proposed Maximum Zoning Envelope | Existing Context Building | Spot Elevation/Height (relative to NAVD88) | Traffic Direction | Proposed Curb Cut |
| Proposed Preliminary Zoning Envelope | Residential Access Point | Proposed Building | NYCHA Property Boundary | Existing Curb Cut (to be relocated) |
| Development Envelope Height
Illustrative Building Height (# of stories)
(Maximum Building Height in Feet Includes Bulkhead) | Commercial Access Point | Parking Access Point | Street Sign | Existing Curb Cut (to be maintained) |
| Illustrative Building Line | Community Access Point | Loading Access (at loading berths) | | |
| | Section 8 PBV Residential Access Point | | | |

- Notes
1. Elevations referenced to North American Vertical Datum of 1988 (NVD88) which is 1.095 feet above National Geodetic Survey Datum at Sandy Hook, New Jersey.
 2. Building shown within zoning envelopes are for illustrative purposes only and are subject to change.
 3. Location of bulkheads illustrative and subject to change.
 4. Graphic scale applicable to all non-dimensioned elements.
 5. The landscape design of open space, including rooftop terraces, street network, and parking lots depicted are shown for illustrative purposes only and are subject to change.
 6. Entrances to proposed buildings are illustrative.
 7. For existing and proposed tree locations refer to "Landscape Plan".



Fulton and Elliott-Chelsea Houses Redevelopment Project

Figure 02.0-3b

Midblock Bulk Alternative, Elliott-Chelsea Houses Site Plan

Table 02.0-6: Midblock Bulk Alternative Compared to No-Action Alternative

Land Use	No-Action Alternative	Midblock Bulk Alt.	Increment
Existing NYCHA DUs	2,056	0	-2,056
Future Section 8 PBV DUs*	0	2,056	+2,056
MIH Affordable DUs	0	1,038	+1,038
Market-Rate DUs	0	2,416	+2,416
Total DUs	2,056	5,510	+3,454
Community facility/ Neighborhood Center gsf	56,859	144,082	+87,223
Daycare gsf	10,300	17,985	+7,685
Medical Office Related Uses gsf	0	13,785	+13,785
Local Retail gsf	0	28,784	+28,784
Supermarket gsf	0	17,580	+17,580
Total Building Area gsf	1.9 million	5.1 million	+3.2 million
Accessory Parking Spaces	95	96	+1
Building height (maximum)	232'	428.5'	+196.5'
Building stories (maximum)	25	39	+14

Note:

* The Section 8 PBV DUs would be set aside for existing NYCHA FEC residents and would replace the existing NYCHA DUs that would remain under the No-Action Alternative. As such, while the classification of these DUs would change, the population served and number of units would be the same as under the No-Action Alternative.

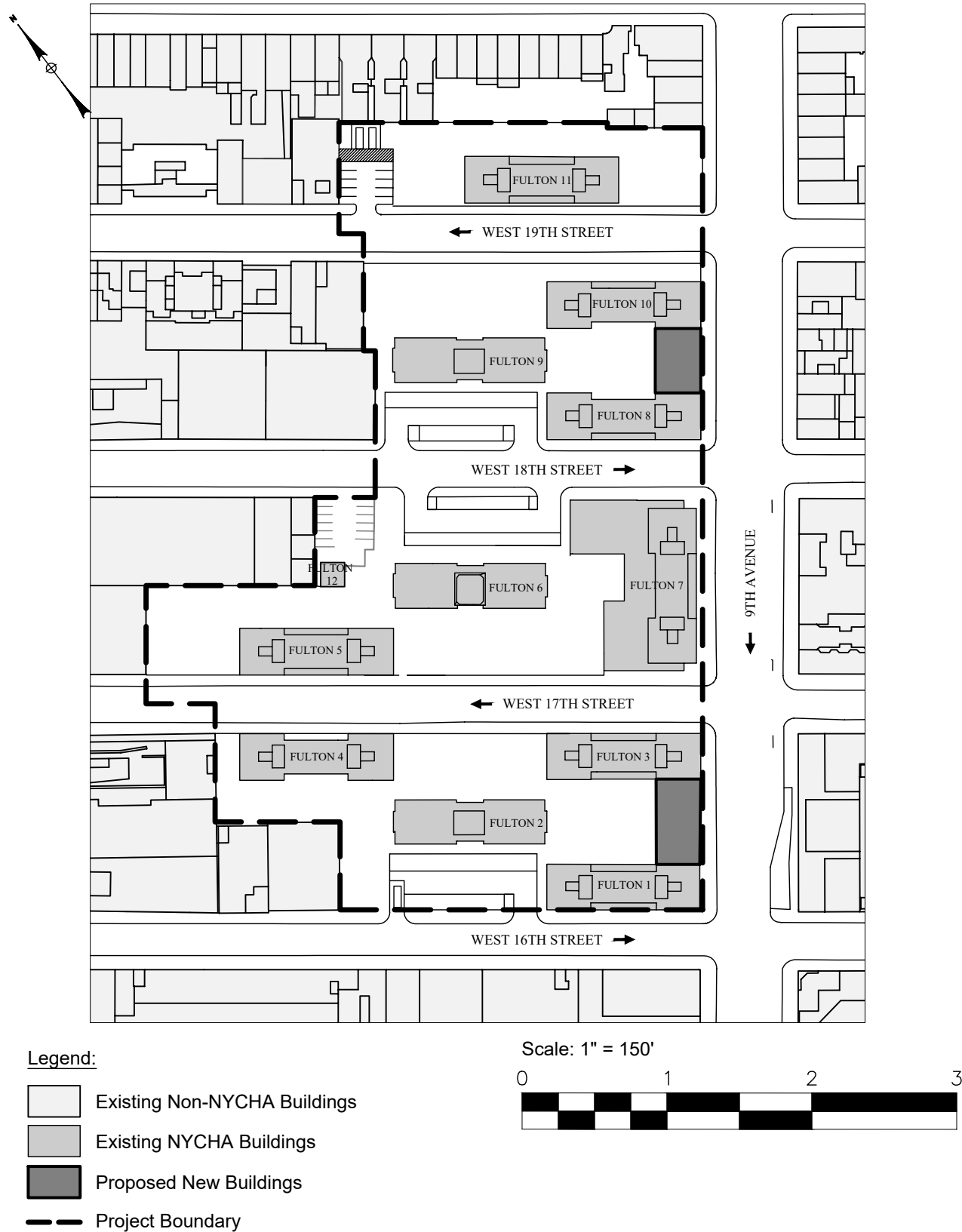
Alternative 5 – Rehabilitation and Infill Alternative

NYCHA issued an RFP in April 2021 in response to the efforts of the Chelsea NYCHA Working Group (CNWG), which sought to systematically and effectively address the Project Sites' capital needs. The RFP response was predicated on a February 2021 report of the CNWG, which estimated a \$366 million total cost to repair the buildings and renovate the existing NYCHA DUs on the Project Sites. This total cost was derived from the 2017 NYCHA Physical Needs Assessment (PNA) for the Project Sites, as adjusted by the CNWG after thorough examination. The PNA involves assessing when in the next 20 years the physical assets that make up NYCHA's buildings and campuses will require replacement or upgrade, and then estimating the costs for these renovations based on current market prices. This investigation and report is conducted by NYCHA approximately every five years as recommended by HUD.

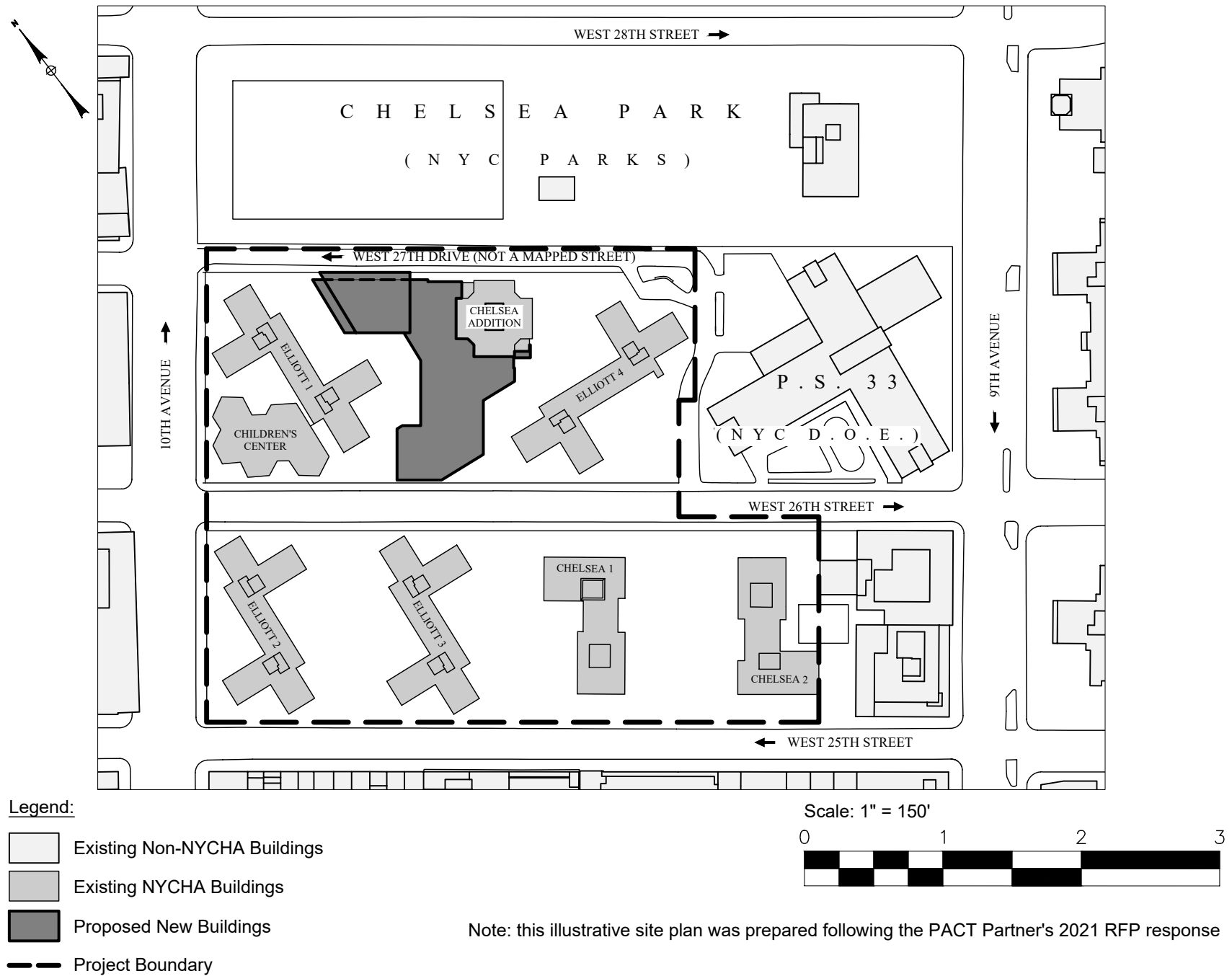
Per the CNWG's recommendations and consistent with the PACT Partner's response to NYCHA's 2021 RFP, the Rehabilitation and Infill Alternative would include rehabilitation and renovation of the existing Project Sites' buildings. The measures would include: comprehensive rehabilitation of apartment kitchens, bathrooms, and floors; building improvements consisting of mold, lead, and asbestos abatement and hazardous materials remediation, installation of new insulated roofs and high-efficiency windows, exterior repairs, emergency rooftop generators, and new lobbies, mailrooms, and laundry facilities; system upgrades or replacements including new hydronic boilers (for reliable heat and hot water), plumbing repairs, elevator replacement; site and grounds improvements including an art walk with improved landscaping; and dry floodproofing and storm gates. **Figures 02.0-4a and 02.0-4b** show illustrative site plans for this alternative.

Subsequent to the RFP process and NYCHA's designation of the PACT Partner, the PACT Partner conducted a comprehensive, five-month, pre-design due diligence process revealing significant, previously unanticipated capital repair needs on the Project Sites that would render this alternative

Rehabilitation and Infill Alternative: Fulton Houses Site Plan



Note: this illustrative site plan was prepared following the PACT Partner's 2021 RFP response



financially infeasible. Additionally, deficiencies of the existing buildings cannot be corrected fully with renovations and can only be fully remedied with new buildings. Examples of this are provided below in **Section C, “Alternatives Considered in the EIS.”** In addition, NYCHA’s most recent PNA released in 2023 estimated that the 20-year need across the Project Sites is now approximately \$927,509,823 (see **Table 02.0-7**).

Table 02.0-7: 2023 Physical Needs Assessment Renovation Cost Estimate

Development	Cost
Chelsea	\$178,933,772
Chelsea Addition	\$47,501,323
Elliott	\$255,225,394
Fulton	\$445,849,334
Total	\$927,509,823

Source: <https://www.nyc.gov/assets/nycha/downloads/pdf/2023-PNA-Report-Physical-Needs-Assessment-NYCHA.pdf>

As discussed below, this alternative has been determined to be infeasible but will be analyzed separately in **Chapter 05.21**.

Development Program

Under the Rehabilitation and Infill Alternative, all of the existing NYCHA DUs on the Project Sites would be converted to Section 8 PBV DUs, and three new buildings would be constructed on the Project Sites.

A new 24-story, 240-foot tall (approximately 148,050-gsf) residential building would be constructed on the Elliott-Chelsea Houses Project Site with 110 DUs, of which 50 percent (55 DUs) would be market-rate units; the remaining 50 percent (55 DUs) would be affordable housing units at various income bands including extremely low, low, moderate, and middle. These would include 25 extremely low income to low income units at or below 60 percent of area median income (AMI) and 30 mid to moderate income units at or below 165 percent of AMI. The existing Hudson Guild spaces on the Elliott-Chelsea Houses Project Site would be relocated to this new building, offering the same services that currently exist on the site. The remainder of the new building’s podium would be occupied by accessory residential space.

The Rehabilitation and Infill Alternative would also include the conversion of the existing community facility space on the Elliott-Chelsea Houses Project Site at 459 W. 26th Street to a 10,030-gsf health care center, as well as construction of two new, one-story infill buildings along 9th Avenue with a total of 7,150 gsf of retail space.

This alternative would be as-of-right under zoning and as such would not require any discretionary land use approvals.

Net Increment of the Rehabilitation & Infill Alternative

Table 02.0-8 identifies the net incremental changes to the Project Sites under the Rehabilitation and Infill Alternative as compared to the No-Action Alternative.

Table 02.0-8: Incremental Development in the Rehabilitation and Infill Alternative

Land Use	No-Action Alternative	Rehab. & Infill Alt.	Increment
Existing NYCHA DUs	2,056	0	-2,056
Future Section 8 PBV DUs *	0	2,056	+2,056
Affordable DUs (Middle, Moderate, Low, and Extremely Low Income)	0	55	+55
Market-Rate DUs	0	55	+55
Total DUs	2,056	2,166	+110
Community facility/ Neighborhood Center gsf	56,859	56,859	0
Daycare gsf	10,300	10,300	0
Medical Office gsf	0	10,030	+10,030
Local Retail(gsf	0	7,150	+7,150
Supermarket gsf	0	0	0
Total Building Area gsf	1.9 million	2.1 million	+0.2 million
Accessory Parking Spaces	95	95	0
Building height (maximum)	232'	240'	+8'
Building stories (maximum)	25	25	0

Note:

* The Section 8 PBV DUs would be set aside for existing NYCHA residents and would replace the existing NYCHA DUs that would remain under the No-Action Alternative. As such, while the classification of these DUs would change, the population served and number of units would be the same as under the No-Action Alternative.

Temporary Relocations

Under the Rehabilitation and Infill Alternative, renovation of existing apartments and community facility uses would proceed on a rolling basis, leading to the staggered temporary relocation of all residents and services. Each resident and service on the Project Sites would need to be temporarily relocated for at least three months as their unit is renovated, while lead abatement would be performed and the electrical and plumbing systems would be improved. The Elliott Center community facility operated by Hudson Guild would be temporarily relocated and temporary space(s) on- and off-site. This community facility would remain operational throughout the construction process with only minimal disruption, closing only to transfer and relocate services to new space on the Project Sites. Refer to **Chapter 05.21** for more information.

Infeasibility of the Rehabilitation and Infill Alternative

As noted above, subsequent to the comprehensive, five-month, pre-design due diligence process undertaken by the PACT Partner, which revealed significant, previously unanticipated capital repair needs on the Project Sites, NYCHA and the PACT Partner determined that this alternative would be financially and logistically infeasible because there would not be enough market-rate units to financially support the PACT and affordable housing components of the Proposed Project. This was substantiated by NYCHA's 2023 *PNA*. Even with the increased funding available through conversion of the existing NYCHA DUs on the Project Sites to Section 8 PBV DUs, underlying challenges of the existing buildings, systems, and grounds of the Project Sites could not be addressed through the recommended rehabilitation efforts. Examples include:

- Americans with Disabilities Act (ADA) compliance would not be achieved on the Project Sites, as it would not be structurally possible to add or expand existing elevators to meet

ADA requirements due to the building's limited elevator cores, and due to the layout of existing apartments, compliance regarding passage, turning radius, and roll-in showers would not be achievable.

- Compliance with the Facade Inspection Safety Program (FISP) would continue to be challenging due to failing brick facades, even with reclad systems.
- Asbestos-containing materials (ACM) on the facades, ceilings, and floors of the Project Sites would not be removed. The presence of ACM poses a challenge, as it is located on the brick relieving angles, spandrels, and window exterior caulking. Complete removal of all exterior ACM would necessitate replacing entire facades. Total removal of ACM in the floor mastic would require grinding, which is both costly and logistically challenging. While the US Environmental Protection Agency (EPA) advises that asbestos that is in good condition and left undisturbed is unlikely to present a health risk, risks from asbestos occur when it is damaged or disturbed and the asbestos fibers become airborne and can be inhaled.⁵ Consistent with NYCHA requirements, any ACM that is disturbed must be abated. Nevertheless, the presence of undisturbed ACM on the Project Sites would remain a potential long-term concern should it become damaged or disturbed in the future.
- There is not enough space in the existing buildings of the Project Sites to enlarge or replace small trash chutes; replace the electrical wiring in the path from the electrical closets to the unit panels; or improve heating, ventilation, and air conditioning (HVAC) systems, which require more space for ducts and risers, thus limiting the ability to improve air quality throughout residences.
- Existing buildings on the Project Sites should not have interconnected utility systems. Current building requirements are traditionally individually linked to utility grid and mains. The timing of retrofitting the buildings to be independent of each other is unpredictable and would likely take an extended period of time to rectify.

Moreover, the pre-design due diligence process determined that, due to the particular conditions of major building systems on the Project Sites, this alternative would require extensive temporary relocation of residents and community facilities. Under this alternative, renovation of existing apartments and community facility uses on the Project Sites would proceed on a rolling basis, leading to the staggered temporary relocation of all residents and services. Furthermore, renovations of building-wide issues would need to be conducted concurrently with repairs of individual units to avoid additional relocation of residents and services beyond that occurring for repair of individual units. This would severely inconvenience residents and community facilities/services during construction.

Under the Rehabilitation and Infill Alternative, each resident and service on the Project Sites would need to be temporarily relocated for at least three months while the DU or space is renovated, lead abatement is performed, and electrical and plumbing systems are improved. However, in some cases, the relocations would likely extend beyond three months due to the complexity of the rehabilitation program, delays in permitting, identification of new permits, review and sign-off by the New York City Department of Buildings (DOB), procurement times, and variances in buildings conditions and levels of deterioration identified during work.

⁵ "Asbestos Frequently Asked Questions." https://www.epa.gov/sites/default/files/documents/asbestosfaqs_0.pdf

Furthermore, subsequent to the temporary relocations, outstanding, uncorrected substandard conditions would still exist in the buildings due to the underlying challenges of the existing structures detailed above.

Overall, the Rehabilitation and Infill Alternative is financially and logistically infeasible and would not meet the identified purpose and need for the Proposed Project (for further detail, please see the text under sub-section “Feasibility of the Rehabilitation and Infill Alternative,” below). As such, it has been determined to be an infeasible alternative in this environmental review. Nevertheless, in response to comments on the DSOW, this infeasible alternative is analyzed for informational purposes in **Chapter 05.21**.

Alternative 6 – No Significant Adverse Impacts Alternative

For projects in New York City that are subject to State Environmental Quality Review (SEQRA)/City Environmental Quality Review (CEQR) and which are expected to result in significant adverse impacts that cannot be mitigated, it is often the practice to determine if a No Significant Adverse Impact Alternative or a No Significant Adverse Unmitigated Impacts Alternative can be identified. This alternative identifies which specific components of a proposed project could be changed to avoid all significant adverse impacts associated with the project and would reasonably satisfy the project’s purpose and need. The No Significant Adverse Impacts Alternative, is infeasible because the Proposed Project would have to be modified to a point where its purpose and need would not be satisfied. Therefore, a No Significant Adverse Impacts Alternative is described below but is not analyzed throughout the EIS and is not being considered for the Proposed Project.

Per the technical impact area analyses provided in **Chapters 05.01 to 05.20**, it is anticipated that the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative would result in significant adverse impacts related to historic resources, shadows, traffic, pedestrians, and construction noise, traffic, and pedestrians. As described in **Chapter 05.21**, the Rehabilitation and Infill Alternative, which as discussed above has been deemed infeasible, would also result in significant impacts related to historic resources.

Additionally, as discussed in **Chapter 05.05, “Shadows,”** the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative would result in significant adverse shadows impacts to two open space resources: Chelsea Park and Public School (PS) 33 Playground. Shadows impacts to Chelsea Park and PS 33 Playground cannot be mitigated by changes to building design or bulk, given the required program and the close proximity of the Elliott-Chelsea Project Site to the affected open space resources. As presented in **Chapter 05.05**, mitigation measures have not been identified at this time. Potential mitigation measures will continue to be explored in consultation with the New York City Department of Parks and Recreation (NYC Parks) and will be published in the FEIS, if identified.

Chapter 05.06, “Historic and Cultural Resources,” identifies that under the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative, an unmitigated significant adverse historic architectural impact would occur due to the demolition of the Elliott-Chelsea Houses Project Site. These buildings are eligible for listing on the State and National Register of Historic Places (S/NR), as determined by the New York State Historic Preservation

Office (SHPO). Consistent with a concurrent review of the effects of the Proposed Project on the Elliott-Chelsea Houses Project Site pursuant to Section 106 of the National Historic Preservation Act, the analysis presented in **Chapter 05.06** concludes that this impact is unavoidable. Furthermore, the chapter also determines, consistent with the Section 106 review, that while it is expected that measures to partially mitigate this impact will be identified, this impact cannot be mitigated fully.

Once completed, the Proposed Project would result in significant adverse traffic impacts at several intersections under the Rezoning Alternative, the Non-Rezoning Alternative, and the Midblock Bulk Alternative, some of which cannot be mitigated. Specifically, as discussed in **Chapter 05.13, “Transportation,”** the Rezoning Alternative and Midblock Bulk Alternative would result in impacts at five, nine, eight, and nine intersections in the weekday AM, midday, PM, and Saturday midday peak hours, respectively. The Non-Rezoning Alternative would result in impacts at five, three, six, and three intersections in the weekday AM, midday, PM, and Saturday midday peak hours, respectively. These impacts are reflective of traffic congestion at these intersections that would be expected under the No-Action Alternative (i.e., these locations are sensitive to traffic impacts given their baseline condition). As noted in **Chapter 05.13**, a total of 19 analyzed signalized intersections would have at least one congested lane group in one or more peak hours in the No-Action Alternative, indicating that traffic impacts are possible under any alternative that adds additional vehicle trips to the congested lane groups, particularly at certain lane groups which the analysis found would have limited additional capacity to accommodate increased traffic demand. In order to avoid all forecasted traffic impacts, the density of the Proposed Project would have to be substantially reduced.

Chapter 05.19, “Construction,” identifies that unmitigated significant adverse construction noise impacts would occur at various receptors under the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative. A site-specific noise mitigation plan to mitigate construction noise impacts to the maximum extent practicable would be developed and implemented. However, as discussed in **Chapter 05.19**, even with the implementation of a noise mitigation plan, there will still be unmitigated construction noise impacts. This is because the Project Sites involve multiple existing and proposed development sites located in close proximity to existing buildings. While construction noise impacts are unavoidable, as noted in **Chapter 05.19**, construction noise is regulated by a number of requirements mandating various noise abatement measures under the New York City Noise Control Code. These measures will be incorporated into a site-specific noise mitigation plan for each of the Project Sites.

In addition, once completed, the Proposed Project would result in significant adverse traffic impacts at several intersections under the Rezoning Alternative, the Non-Rezoning Alternative, and the Midblock Bulk Alternative, some of which cannot be mitigated. Specifically, the Rezoning Alternative and Midblock Bulk Alternative would result in impacts at one intersection in the weekday AM construction peak hour and five lane groups at five intersections in the weekday PM construction peak hour. The Non-Rezoning Alternative would result in impacts at one intersection in the weekday AM construction peak hour and seven intersections in the weekday PM construction peak hour. These impacts are reflective of traffic congestion at these intersections that would be expected under the No-Action Alternative (i.e., these locations are sensitive to traffic impacts given their baseline condition). As noted in **Chapter 05.19**, a total of 10 analyzed signalized intersections would have at least one congested lane group in one or more peak hours

in the No-Action Alternative, indicating that traffic impacts are possible under any alternative that adds additional vehicle trips to the congested lane groups, particularly at certain lane groups which the analysis found would have limited additional capacity to accommodate increased traffic demand. In order to avoid all forecasted traffic impacts, the density of the Proposed Project would have to be substantially reduced.

Similar to the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative, and as discussed in **Chapter 05.21**, the Rehabilitation and Infill Alternative would result in a partially unmitigated significant adverse historic architectural impact due to the demolition of the Elliott Center structure and its replacement with a new 24-story building on W. 27th Drive that would replace existing private open space on the S/NR-eligible Elliott-Chelsea Houses Project Site. Similar to the feasible alternatives, it is expected that for this alternative, measures to partially mitigate this impact would be identified, but that this impact cannot be mitigated fully.

Since the entire Elliott-Chelsea Houses Project Site has been determined to be S/NR-eligible by SHPO, a No Significant Adverse Impact Alternative would have to both retain the existing buildings on the Elliott-Chelsea Houses Project Site and refrain from any new construction that would alter the historic campus. In addition, to avoid significant transportation or construction noise impacts, the Proposed Project would have to be substantially reduced in size with respect to the Fulton Houses Project Site. While a project involving no new construction on the Elliott-Chelsea Houses Project Site and much less construction on the Fulton Houses Project Site would avoid significant adverse impacts, such a reduced project would not meet the purpose and need for the Proposed Project—which, in brief, is to provide, in a timely manner, better quality housing for the current residents of the Project Sites, provide additional affordable housing development, and market-rate housing that would financially support the PACT and affordable housing components of the Proposed Project.

It is noted that conversion of the existing NYCHA DUs to Section 8 PBV DUs through a conventional PACT/RAD conversion, which would involve a more comprehensive rehabilitation of the existing buildings on the Project Sites without any new development, also would likely avoid some if not all significant adverse environmental impacts. In fact, HUD classifies PACT/RAD conversions as categorically excluded from environmental review under the National Environmental Policy Act (NEPA) of 1969 in recognition of the fact that such conversions do not have any potential for significant adverse environmental impacts. However, a conventional PACT/RAD conversion is considered to be infeasible for the Project Sites. While conversion of the existing NYCHA DUs to Section 8 PBV DUs would lead to increased Federal funding that would allow the PACT Partner to undertake some rehabilitation efforts at the Project Sites, the funding would still fall short of the total capital investment needs for the next 20 years, as discussed in **Section B, “Background.”** Further, these rehabilitation efforts would not be able to address basic substandard features of the buildings, including but not limited to: limited elevator cores; limited space to meet ADA requirements; small trash chutes; ACM that cannot be removed from building facades without complete replacement; insufficient space to fully update electrical wiring; only enough space for limited improvements to building HVAC systems; and an inability to alter the buildings’ interconnected utility systems. In addition, a PACT/RAD conversion without any additional development would fail to provide any new affordable or market-rate housing, and thus would neither address the critical shortage of affordable housing in New York City nor create a stable funding source to maintain and operate the Section 8 PBV housing into the future.

Accordingly, like a No Significant Adverse Impact Alternative, a conventional PACT/RAD conversion alternative is not financially and logistically feasible and would not meet the identified purpose and need for the Proposed Project.

In conclusion, as a No Significant Adverse Impacts Alternative has been determined to be infeasible. The discussion above serves as an analytical tool that demonstrates there is no alternative that could meet the purpose and need for the Proposed Project without resulting in significant adverse impacts. Furthermore, as some of these impacts have been determined to be unavoidable, any feasible alternative that would meet the proposed purpose and need for the Proposed Project would also result in the unmitigated significant adverse impacts identified above. Accordingly, a No Significant Adverse Impacts Alternative will not be analyzed further in the EIS.

Summary of Proposed Project Alternatives

Table 02.0-9 provides a summary of the development program and key building bulk characteristics for the No-Action Alternative, Rezoning Alternative, Non-Rezoning Alternative, Midblock Bulk Alternative, and Rehabilitation and Infill Alternative. This table identifies the full development program associated with each of these alternatives. The table also identifies whether each alternative requires a change to the underlying zoning, whether each alternative satisfies the purpose and need for the Proposed Project, and whether each alternative has been determined to be feasible. Additionally, the table identifies the total project area (i.e., the geographic area affected) for each alternative.

As shown in the table, the development program is identical for the Rezoning Alternative and the Midblock Bulk Alternative. The development program for the Non-Rezoning Alternative would result in less new residential development than the Rezoning Alternative and the Midblock Bulk Alternative. All three of these alternatives have been determined to be feasible and would satisfy the purpose and need for the Proposed Project.

Feasibility of the Rehabilitation and Infill Alternative

As discussed above, the Rehabilitation and Infill Alternative is financially and logistically infeasible and, further, would not meet the identified purpose and need for the Proposed Project, as it would not:

- Improve the quality of life and housing stability for all existing residents of the Project Sites to the same extent as the Rezoning Alternative because newly constructed affordable units would only be available to 55 existing NYCHA households;
- Address the critical shortage of affordable housing and housing in general in New York City to the same degree as the Rezoning Alternative because only 55 new MIH affordable and 55 market-rate dwelling units would be constructed;
- Financially support the PACT portion of the project to the same degree as the Rezoning Alternative because only 55 new market-rate units would be constructed; or
- Facilitate the development of additional community facility space for the benefit of residents of the Project Sites and the surrounding community.

As such, the Rehabilitation and Infill Alternative is not under consideration as a viable alternative that may be selected for the implementation of the Proposed Project. In light of this, the effects of the Rehabilitation and Infill Alternative on all technical areas of concern are presented in **Chapter 05.22**, instead of being presented in the technical area Chapters 05.01 to 05.20 where the other alternatives are presented.

Feasibility of the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative

As noted in **Table 02.0-9**, the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative have been determined to be feasible and meet the need for the Proposed Project. Accordingly, the technical analysis chapters in this EIS identify the effects of the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative and make determinations as to whether such effects would result in significant adverse impacts. Whenever consistent with CEQR and NEPA guidance, the effects of these alternatives are based on the incremental changes that would occur as compared to the No-Action Alternative, which serves as the baseline for comparison.

Table 02.0-9: Summary of Proposed Project Alternatives¹

Land Use	Alternative 1 No-Action Alternative	Alternative 2 Rezoning Alternative	Alternative 3 Non-Rezoning Alternative	Alternative 4 Midblock Bulk Alternative	Alternative 5 Rehabilitation and Infill Alternative
Existing NYCHA DUs	2,056	0	0	0	0
Future Section 8 PBV DUs ²	0	2,056	2,056	2,056	2,056
MIH Affordable DUs ³	0	1,038	536	1,038	55
Market-Rate DUs	0	2,416	1,247	2,416	55
Total DUs	2,056	5,510	3,839	5,510	2,166
Community facility/Neighborhood Center gsf	56,859	144,082	175,007	144,082	56,859
Daycare gsf	10,300	17,985	12,655	17,985	10,300
Medical Office Related Uses gsf	0	13,785	12,046	13,785	10,030
Local Retail gsf	0	28,784	21,675	28,784	7,150
Supermarket gsf	0	17,580	7,400	17,580	0
Total Building Area sf	1.9 million	5.1 million	3.6 million	5.1 million	2.1 million
Accessory Parking Spaces	95	96	96	96	96
Building height (maximum)	232'	428.5'	428.5'	428.5'	240'
Building stories (maximum)	25	39	39	39	24
Project Area ⁴	Project Sites	Project Sites	Project Sites	Project Sites	Project Sites
Requires a Rezoning?	No	Yes	No	Yes	No
Meets Project Purpose and Need?	No	Yes	Yes	Yes	No
Feasible?	Not applicable ⁵	Feasible	Feasible	Feasible	Infeasible

Notes:

¹ The development program indicated for each alternative is the full program under “With-Action” conditions, not the increment as compared to the No-Action Alternative.

² The Section 8 PBV DUs would be set aside for existing NYCHA residents and would replace the existing NYCHA DUs that would remain under the No-Action Alternative. As such, while the classification of these DUs would change, the population served and number of units would be the same as under the No-Action Alternative.

³ The affordability requirements under the Non-Rezoning Alternative for the proposed affordable housing units in the mixed-income buildings would be defined and ensured through legal agreements between NYCHA and the PACT Partner.

⁴ The development boundary is the same for all alternatives and consists of the Project Sites defined in **Chapter 04.0, Section C, “Project Sites.”**

⁵ Feasibility determinations are not made for a No-Action Alternative.