

A. INTRODUCTION

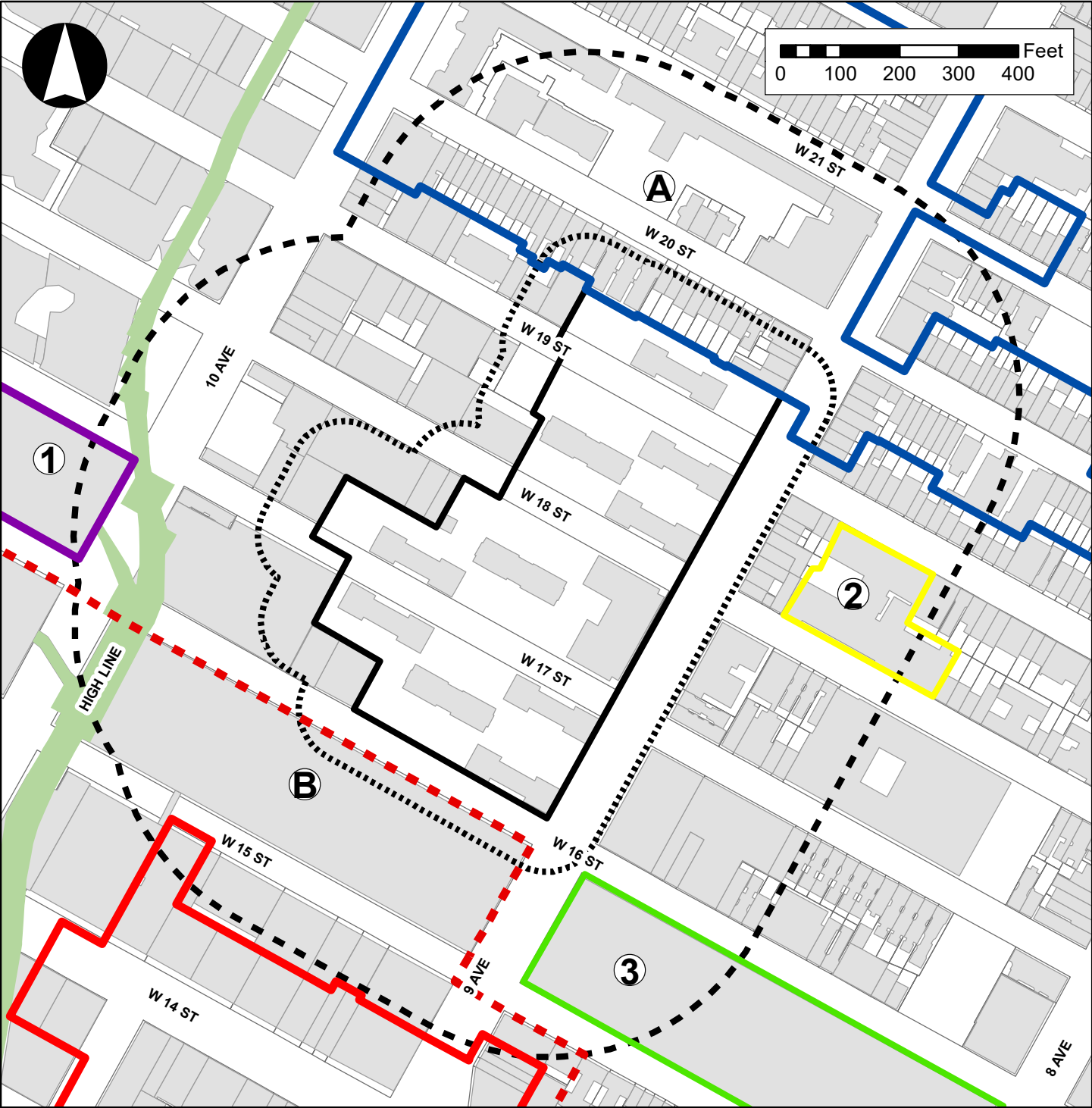
This chapter identifies historic and cultural resources (including archaeological and architectural resources) in the Areas of Potential Effect (APE) for the Proposed Project, probable effects on these resources, avoidance and minimization of harm to such resources, and coordination with appropriate agencies and stakeholders. The Proposed Project's potential effects on historic and cultural resources due to both construction and operation are considered in this chapter. Construction effects are also discussed in **Chapter 05.19, "Construction."**

The Proposed Project has four APEs: two primary APEs (the Fulton Houses Project Site and the Elliott-Chelsea Houses Project Site), in which construction and operation of the Proposed Project may directly or indirectly affect historic properties; and more expansive secondary APEs, which extend approximately 400 feet from each of the primary APEs (illustrated in **Figures 05.06-1a** and **05.06-1b**). To facilitate the analysis of effects, the secondary APE has been subdivided to indicate the area in which the Proposed Project could cause potential direct construction-related effects (within 90 feet) and the area in which the Proposed Project could cause indirect visual or contextual effects (within 400 feet). Further, the APE for archaeological resources is limited to the primary APEs, where construction of the Proposed Project would result in in-ground disturbances.

The 2021 *City Environmental Quality Review Technical Manual (CTM)* identifies historic and cultural resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. This includes designated New York City Landmarks (NYCL); properties calendared for considering as landmarks by the New York City Landmarks Preservation Commission (LPC); properties listed on the State/National Registers of Historic Places (S/NR) or contained within a district listed on the S/NR or formally determined eligible for S/NR-listing; properties recommended by the New York State Board for listing on the S/NR; National Historic Landmarks (NHL); and properties not identified by one of the programs listed above, but that meet their eligibility requirements.

The analysis provided in this EIS was prepared in accordance with Section 106 of the National Historic Preservation Act of 1966 (NHPA), as implemented by Federal regulations appearing in Title 36, Code of Federal Regulations, part 800 (36 CFR 800), in consultation with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), acting in its capacity as the New York State Historic Preservation Office (SHPO), and the following consulting parties, the Advisory Council on Historic Preservation (ACHP), and LPC. Comment letters from SHPO, LPC, and the Historic Districts Council are included in **Appendix D.1**.

As discussed in **Chapter 02.0, "Project Alternatives,"** there are three feasible alternatives under consideration for implementation of the Proposed Project. These include: Alternative 2 – the Rezoning Alternative; Alternative 3 – the Non-Rezoning Alternative; and Alternative 4 – the Midblock Bulk Alternative. A discussion of Alternative 5 – the Rehabilitation and Infill Alternative, which has been determined to be infeasible, is presented in **Chapter 05.22, "Rehabilitation and Infill Alternative Analysis."** Refer to **Chapter 04.0, "Analysis**



Source: NYC DCP (PLUTO 2023v3.1); DOITT (2022); NYC LPC; NYS OPRHP

Primary APE: Fulton

400-Foot Secondary

90-Foot Radius

Study Area Historic

Chelsea Historic District (LPC-Designated)

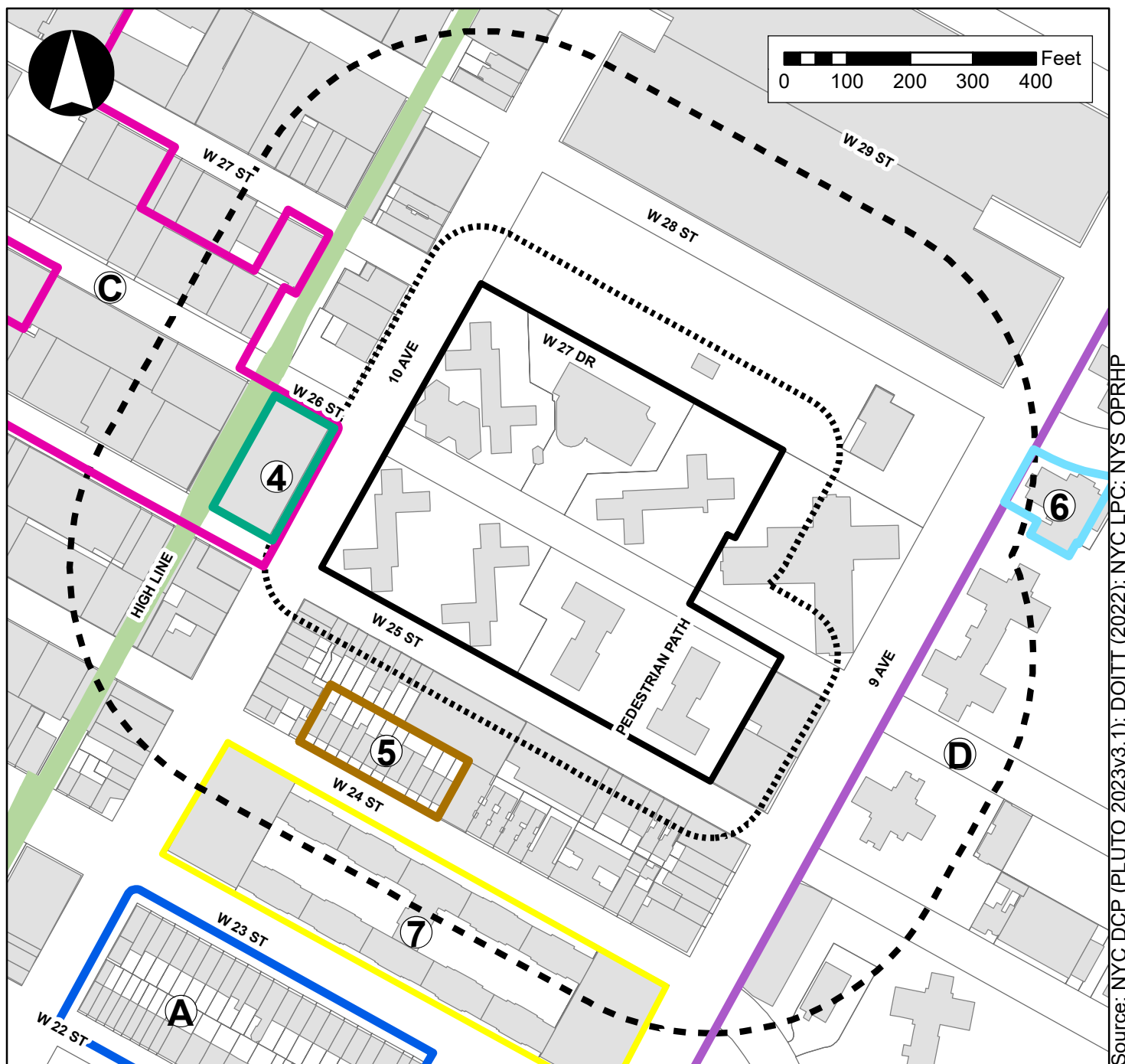
Gansevoort Market Historic District (LPC-Designated)

Gansevoort Market Historic District (S/NR-Listed)

Merchants Refrigerating Company Warehouse (S/NR-Listed)

Bayard Rustin High School for the Humanities (S/NR-Eligible)

Port of NY Authority & Union Inland Terminal (S/NR-Eligible)



Source: NYC DCP (PLUTO 2023v3.1); DOITT (2022); NYC LPC; NYS OPRHP

Legend

- Primary APE: Elliott-Chelsea Houses (S/NR-Eligible)
- 400-Foot Secondary APE
- 90-Foot Radius

Study Area Historic Resources

- Church of the Holy Apostles (S/NR-Listed; LPC-Designated)
- Houses at 437-459 West 24th Street (S/NR-Listed; LPC-Designated)
- R.C. Williams Warehouse (S/NR-Listed)

- Chelsea Historic District (S/NR-Listed; LPC-Designated)
- West Chelsea Historic District (LPC-Designated; S/NR-Eligible)
- Penn South (S/NR-Eligible)
- London Terrace (S/NR-Eligible)

Framework,” Table 04.0-4, for information on the analysis approach for the three feasible alternatives for each technical area.

B. PRINCIPAL CONCLUSIONS

Archaeological Resources

Archaeological resources are considered only in those areas where new excavation or ground disturbance is likely and would result in new in-ground disturbance as compared to No-Action conditions. Therefore, these areas are limited to the primary APEs (the Fulton Houses Project Site and the Elliott-Chelsea Houses Project Site) that would be developed as a result of the Proposed Project (illustrated in **Figures 05.06-1a** and **05.06-1b**). As determined by LPC in a letter dated June 12, 2023, and by SHPO in a letter dated January 29, 2025 (provided in **Appendix D.1**), none of the lots comprising the Project Sites have archaeological significance. Therefore, the Proposed Project would not have the potential to result in any significant adverse archaeological impacts and an archaeological analysis is not warranted.

Architectural Resources

The Fulton Houses Project Site does not contain any designated or eligible historic architectural resources, but the Elliott-Chelsea Houses Project Site is S/NR-eligible. Additionally, all or portions of 11 designated and/or eligible historic architectural resources are located within the secondary APEs, as shown in **Figures 05.06-1a** and **05.06-1b** and detailed further in **Section D, “Affected Environment”** and **Table 05.06-1** below. The Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative would not result in significant adverse indirect or contextual impacts, shadows impacts, or construction-related impacts to historic resources.

However, the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative would all result in the staged demolition of the S/NR-eligible Elliott-Chelsea Houses and the construction of seven new buildings on that Project Site. As such, the three alternatives would result in significant adverse direct impacts to the S/NR-eligible historic resource. The Section 106 Alternatives Analysis conducted for the Proposed Project (provided in **Appendix D.2**) considers alternatives to the demolition of the Elliott-Chelsea Houses with the goal of avoiding or minimizing the adverse effect, but concludes that there is no prudent and feasible alternative to the demolition of the S/NR-eligible Elliott-Chelsea Houses in consideration of the Proposed Project’s purpose and need. As detailed in a letter dated October 1, 2024 (provided in **Appendix D.1**), SHPO concurs with this determination. The demolition of the Elliott-Chelsea Houses under the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative would result in an adverse effect to a historic resource but would allow for the construction of a financially viable project that would improve the quality of life and housing stability for existing NYCHA residents of the deteriorating buildings and directly address the critical shortage of affordable housing in New York City.

As such, the New York City Housing Authority (NYCHA), the New York City Department of Housing Preservation and Development (HPD), and the PACT Partner have worked with SHPO and Section 106 consulting parties to develop measures to partially mitigate the adverse effect of

demolishing the Elliott-Chelsea Houses, as set forth in the draft Memorandum of Agreement (MOA) pursuant to Section 106 of the NHPA provided in **Appendix D.2**. As detailed in the draft MOA and discussed in **Chapter 05.21, “Mitigation,”** proposed mitigation measures include:

1. The preparation of an Unanticipated Discoveries Protocol.
2. A Historic American Buildings Survey (HABS) Level 2 recordation of the Elliott-Chelsea Houses.
3. The design and installation in a publicly accessible location of an interpretive display that adequately presents the history and significance of the Elliott-Chelsea Houses.
4. The development and implementation of Construction Protection Plans for surrounding historic properties within 90 feet of the Project Site.
5. Review and approval of all plans, final reports, studies, and Construction Protection Plans detailed above by SHPO, LPC, and the Historic Districts Council (the Section 106 consulting parties).

C. METHODOLOGY

Definition of the Areas of Potential Effect (APE)

A required step in the Section 106 process is determining the APE, which is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if such properties exist” (36 CFR 800.16[d]). The APE is influenced by the scale and nature of an undertaking.

According to *CTM* guidance, impacts on historic architectural resources are considered on those sites affected by a proposed project and in the area surrounding the project site. In general, adverse effects on historic architectural resources may include both direct physical effects – demolition, alteration, or damage from construction – and indirect effects, such as the introduction of visual, audible, or atmospheric elements that may alter the characteristics of a historic property that qualify it for inclusion in the S/NR in a manner that would diminish the integrity of the property’s historic features.

As shown in **Figures 05.06-1a** and **05.06-1b**, the Proposed Project has four APEs that are analyzed in this EIS: two primary study areas (the Fulton Houses Project Site and the Elliott-Chelsea Houses Project Site), and two secondary study areas (which extend approximately 400 feet from each primary study area). The primary APEs are areas in which construction and operation of the Proposed Project may directly or indirectly affect historic properties. The more expansive secondary APEs include the areas in which the Proposed Project could cause potential construction-related effects (within 90 feet) and the areas in which the Proposed Project could cause indirect visual or contextual effects (within 400 feet).

Direct effects may include physical damage or destruction of a resource or its setting. The portion of the primary APE in which there is the potential for the Proposed Project to cause direct effects includes all locations that could potentially be subject to direct ground-disturbing activities and adjacent areas within 90 feet. Project activities are anticipated to include demolition, excavation, pile-drilling, cutting and filling, and staging. As defined in DOB’s *TPPN #10/88* and in

conformance with NYC Building Code Chapter 3309.4.4, adjacent construction is defined as any construction activity that would occur within 90 feet of a historic resource.

Indirect effects may include the introduction of visual, audible, or atmospheric elements that alter the characteristics of a historic property that qualify it for inclusion on the State or National Register. To account for potential indirect effects, the secondary APE extends 400 feet from the Project Sites, following the guidance of the *CTM*.

Identification of Historic Properties within the APE

Once the APEs were determined, an inventory of officially recognized architectural resources within the APEs was compiled that includes NHLs, S/NR-listed properties or properties determined eligible for listing, NYCLs and Historic Districts, and properties that have been found by LPC to appear eligible for designation, considered for designation (“heard”) by LPC at a public hearing, or calendared for consideration at such a hearing (“pending”).

Criteria for listing on the National Register are in the 36 CFR 63. As recommended in the *CTM*, Chapter 9, Section 160, LPC has adopted these criteria for use in identifying National Register listed and eligible architectural resources for CEQR review. Following these criteria, districts, sites, buildings, structures, and objects are eligible for the National Register if they possess integrity of location, design, setting, materials, workmanship, feeling, and association, and: (1) are associated with events that have made a significant contribution to the broad patterns of history (Criterion A); (2) are associated with significant people (Criterion B); (3) embody distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction (Criterion C); or (4) may yield information important in prehistory or history. Properties younger than 50 years of age are ordinarily not eligible, unless they have achieved exceptional significance. Official determinations of eligibility are made by the OPRHP/SHPO.

Within New York City, LPC designates historically significant properties in the City as NYCLs and/or Historic Districts, following the criteria provided in the Local Laws of the City of New York, New York City Charter, Administrative Code, Title 25, Chapter 3. Buildings, properties, or objects, or portions thereof, are eligible for landmark status when they are at least 30 years old. Landmarks have a special character or special historical or aesthetic interest or value as part of the development, heritage, or cultural characteristics of the City, State, or nation. There are four types of NYCLs: individual landmarks, interior landmarks, scenic landmarks, and historic districts.

Evaluation of Potential Effects on Historic Properties

Once the historic properties in the APEs were identified, the effects of the Proposed Project under each of the development alternatives on those resources were assessed. As described above, effects on historic properties identified in this chapter may include both direct effects and indirect effects. Assessments of effects are based on ACHP’s Criteria of Adverse Effect codified in 36 CFR 800.5(a)(1) and (2). The assessment may result in three possible findings: no effect (no historic properties affected); no adverse effect; or adverse effect. According to ACHP’s criteria, an adverse effect is found “when an undertaking may alter, directly or indirectly, any of the characteristics of

a historic property that quality the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." Examples of adverse effects include, but are not limited to, "physical destruction or damage of all or part of the property;" "removal of the property from its historic location; change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;" and "introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." Adverse effects may include "reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative."

According to the *CTM*, generally, if a project would affect those characteristics that make a historic resource eligible for NYCL designation or S/NR listing, this could be a significant adverse impact. The Proposed Project is assessed below in accordance with the guidance established in the *CTM* (Chapter 9, Part 420) to determine (a) whether there would be a physical change to any designated or listed property as a result of the Proposed Project; (b) whether there would be a physical change to the setting of any designated or listed resource, such as context or visual prominence, as a result of the Proposed Project; and (c) if so, whether this change is likely to diminish the qualities of the resource that make it important. The different development alternatives are analyzed by the following criteria:

- **Direct (Physical) Impacts:** Historic resources can be directly affected by physical destruction, demolition, damage, alteration, or neglect of all or part of a historic resource. For example, alterations, such as the addition of a new wing to a historic building or replacement of the resource's entrance, could result in significant adverse impacts, depending on the design. Direct effects also include changes to an architectural resource that causes it to become a different visual entity, such as a new location, design, materials, or architectural features.
- **Indirect (Contextual) and Shadows Impacts:** According to the *CTM*, possible contextual impacts to architectural resources may include isolation of a historic property from, or alteration of, its setting or visual relationships with the streetscape. This includes changes to a resource's visual prominence so that it no longer conforms to the streetscape in terms of height, footprint, or setback; is no longer part of an open setting; or can no longer be seen as part of a significant view corridor. Other potential impacts include the generation of significant shadows cast on nearby sunlight-sensitive features of historic structures, such as stained-glass windows. Significant indirect impacts can occur if a project would cause a change in the quality of a property that qualifies it for listing on the S/NR or for designation as a NYCL.
- **Construction-Related Impacts:** Any new construction taking place within historic districts or adjacent to individual landmarks has the potential to cause damage to those historic resources from ground-borne construction vibrations. Additional protective codes beyond those provided in the New York City Building Code apply to LPC-designated and S/NR-listed historic resources located within 90 linear feet of a proposed construction site. For those structures, DOB's *TPPN #10/88* applies, supplementing the standard building protections of the Building Code by requiring, among other things, a monitoring program to reduce the likelihood of construction damage to adjacent LPC-designated or S/NR-listed resources (within 90 feet) and to detect at an early stage the beginnings of damage so that construction procedures can be changed.

D. AFFECTED ENVIRONMENT

Regulatory Context

The regulatory context for the Proposed Project includes the following Federal and State laws:

National Historic Preservation Act (Section 106)

Section 106 mandates that Federal agencies consider the effects of their actions on any properties listed on or determined eligible for listing on the National Register of Historic Places and afford the ACHP a reasonable opportunity to comment on such undertakings. The lead Federal agency, in consultation with SHPO and consulting parties, must determine whether a proposed project would have any adverse effects on historic properties within the APE. Section 106 requires consultation with SHPO, Federally- or State-recognized sovereign nations that might attach religious and cultural significance to historic properties affected by the project. In addition, ACHP may elect to participate in consultation, if certain criteria are met.

The review under Section 106 can be conducted in coordination with analyses conducted for NEPA. In addition, because the views of the public are essential to informed Federal decision-making in the Section 106 process, the public should be informed about the project and its effects on historic properties and given the opportunity to comment. This public comment element can be combined with the public participation component required by NEPA. The public participation efforts being conducted for the Proposed Project are described in **Chapter 03.0, “Process, Coordination, and Public Participation.”**

Section 101(d)(6)(B) of the NHPA requires the Federal lead agency to consult with any Indian tribe that attaches religious and cultural significance to historic properties that may be affected by the undertaking. The Federal lead agency shall ensure that consultation in the Section 106 process provides the Indian tribe a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of properties, including those of traditional religious and cultural importance, articulate its views on the undertaking’s effects on such properties, and participate in the resolution of adverse effects.

The basic steps of the Section 106 process are as follows:

- In consultation with the SHPO, the Federal agency establishes an APE for the project, carries out appropriate steps to identify historic properties within the APE, and, in consultation with the SHPO, applies the National Register criteria for those properties that have not been previously evaluated for National Register eligibility. For properties of religious and cultural significance to participating Indian tribes, the Federal agency also consults with the Tribal Historic Preservation Officer (THPO) or designated tribal representative to assess eligibility.
- If historic properties are identified, the Federal agency, in consultation with the SHPO, applies the criteria of adverse effect (36 CFR 800.5(a)(1)) to identified historic properties within the APE, taking into consideration any views provided by consulting parties and the public. For properties of religious and cultural significance to Federally- and State-recognized sovereign nations, the Federal agency also consults with the THPO or

designated tribal representative. In general, an adverse effect is found if the project may cause a change in the characteristics of the historic property that qualify it for inclusion in the National Register. The Federal agency notifies the SHPO, ACHP, participating sovereign nations, and other consulting parties of its finding and provides supporting documentation meeting standards outlined in the regulations. The information is also made available to the public.

- If the assessment finds that the Proposed Project may have an adverse effect, consultation continues among the SHPO, ACHP, and other consulting parties to seek measures and/or alternatives that would avoid, minimize, or mitigate adverse effects on historic properties. Members of the public are also provided an opportunity to articulate any views on resolving the project's adverse effects. This mitigation is typically implemented through a Memorandum of Agreement (MOA) or Programmatic Agreement (PA).
- Consultation typically results in an MOA or PA, outlining agreed-upon measures to avoid, minimize, or mitigate the project's effects on historic properties. Execution of the MOA or PA and implementation of its terms satisfy the requirements of Section 106, and the project proceeds under the terms of the MOA or PA. The draft MOA for the Proposed Project is provided in **Appendix D.2**.

NYCHA and HPD sent letters to SHPO, LPC, ACHP, the New York Landmarks Conservancy, the Historic Districts Council, the Delaware Nation, the Delaware Tribes of Indians, the Shinnecock Indian Nation, and the Stockbridge Munsee Community describing the Proposed Project and advising of the opportunity to participate as a consulting party in the Section 106 process. SHPO, LPC, and the Historic Districts Council responded affirmatively and have been acting as consulting parties together with HPD and NYCHA.

New York State Historic Preservation Act

The New York State Historic Preservation Act of 1980 (NYSHPA) closely resembles NHPA and requires that State agencies consider the effects of their actions on properties listed on or determined eligible for listing on the State Register of Historic Places. When a proposed project is being reviewed pursuant to Section 106 of the NHPA (and 36 CFR 800), the procedures in Section 14.09 of the NYSHPA do not apply, and any review and comment by the SHPO must be within the framework of Section 106 procedures (NYSHPA Section 14.09[2]). Therefore, the Proposed Project is not being reviewed separately under NYSHPA Section 14.09.

Existing Conditions

Primary APEs (Project Sites)

In a letter dated June 12, 2023 (provided in **Appendix D.1**), LPC determined that the Project Sites were not eligible for designation as NYCLs. As discussed above, in a letter dated October 19, 2023 (also provided in **Appendix D.1**), SHPO concluded that Fulton Houses Project Site is not eligible for listing on the S/NR, but determined that Elliott-Chelsea Houses Project Site is eligible for listing on the S/NR. Photos of the S/NR-eligible Elliott-Chelsea Houses are presented in **Figures 05.06-2a and 05.06-2b**, and a description of the historic architectural resource is provided below.



9. View looking south at an Elliott-Chelsea high-rise building in the primary APE on W. 27th Drive between 9th Avenue and 10th Avenue.



10. View looking northeast at Chelsea Park from the intersection of W. 27th Drive and 10th Avenue.



11. View looking north at the Hudson Guild Elliott Center in the primary APE on W. 26th Street between 9th Avenue and 10th Avenue.



12. View looking east along W. 26th Street between 9th Avenue and 10th Avenue.



13. View looking southeast at an Elliott-Chelsea high-rise building in the primary APE from W. 26th Street between 9th Avenue and 10th Avenue.



14. View looking southeast at the Elliott-Chelsea primary APE from the midblock of W. 26th Street between 9th Avenue and 10th Avenue.



15. View looking northeast at an Elliott-Chelsea high-rise building in the primary APE from the intersection of 10th Avenue and W. 25th Street.



16. View looking southeast at residential buildings across from the primary APE along W. 25th Street between 9th Avenue and 10th Avenue.

Elliott-Chelsea Houses (S/NR-Eligible)

The Elliott-Chelsea Project Site is a NYCHA complex bounded by W. 25th Street to the south, 9th Avenue to the east, W. 27th Drive to the north, and 10th Avenue to the west in the Chelsea neighborhood of Manhattan. It consists of three contiguous campuses on two blocks: the John Lovejoy Elliott Houses, the Chelsea Houses, and Chelsea Addition.

Elliott Houses

The John Lovejoy Elliott Houses were constructed in 1945-47 to the designs of architects Archibald Manning Brown, William Lescaze, and Morris & O'Connor on parts of the two blocks bounded by 9th Avenue, W. 25th Street, 10th Avenue, and W. 27th Street. They consist of two 12-story buildings and two 11-story buildings, containing a total of 608 units of one- to-three bedrooms, which occupy approximately 20 percent of the site; the rest of the site is comprised of landscaping and sitting areas, a playground, and concrete walking paths. The Elliott Houses also contain a day-care nursery on the ground floor of Building 1, run by Hudson Guild as well as the Hudson Guild Theater. As part of the project, W. 27th Street was eliminated from the City Map and replaced by a narrow service road (named W. 27th Drive) that did not extend to 9th Avenue, instead looping around the site to connect with W. 26th Street. The Elliott Houses were NYCHA's first housing project completed after World War II, and the first 16 tenants were all families of veterans.

The architects designed the brick, steel, and concrete buildings of the Elliott Houses with pinwheel footprints set within open spaces, and each building consists of an L-shaped north unit and south unit, with each unit having a separate elevator and stair core. The building facades are flat, largely unornamented brick surfaces punctuated with regularly arranged window openings of three sizes containing double-hung windows. On the eighth floor of each building, there is a cross-over hallway lined with apartments connecting the two units. The long-sides of the buildings are aligned against the Manhattan street grid at a true east-west orientation. To save on costs, the buildings were constructed with a concrete-column-and-slab structural system, brick cavity walls, and unfinished concrete-slab ceilings.

Chelsea Houses

The Chelsea Houses were constructed in 1962-64 to the designs of Paul L. Wood & Associates on the site adjacent to the Elliott Houses between W. 25th and W. 26th Streets. They consist of two brick, concrete, and steel buildings with a total of 425 apartments, of which 61 were originally set aside for seniors. Each building is a 21-story slab structure with an L-shaped footprint and flat, unornamented brick facades punctuated with regularly spaced window openings of two sizes containing double-hung windows. A landscaped play area is located between the buildings, and a paved parking and storage area is located on the east side of the easternmost building.

Development of the Chelsea Houses also included construction of the one-story Hudson Guild Early Childhood Center at the corner of 10th Avenue and W. 26th Street within the Elliott Houses site. The Children's Center is attached to Elliott Houses Building 1 as an extension of the existing day-care nursery in that building. Replacing a landscaped sitting area, the Children's Center has a footprint composed of six hexagonal playrooms located along a corridor branching toward 10th

Avenue from a lobby that connects internally with Elliott Houses Building 1. Designed in a Mid-Century Modern style, the three facades are composed of faceted, recessed, and projecting bays reflecting the floorplan of the building.

Chelsea Houses Addition

The Chelsea Houses Addition, commonly known as Chelsea Addition, was constructed in 1968 to the design of Edelbaum & Webster Architects on W. 27th Drive between Buildings 1 and 4 of the Elliott Houses. It is a 14-story Brutalist-style concrete and brick tower set on a two-story base with a two-story concrete and brick extension. Above the base, the tower has a cross-shaped footprint, creating wide north, south, east, and west facades and three-sided recessed, canted corners. The facades of the tower are articulated with concrete grids composed of thin piers, lintels, and sills that frame recessed metal windows and recessed concrete panels. Brick walls, which form the angled sides of the canted corners, frame the outer edges of the concrete grids. The narrow, flat wall of each corner is concrete and contains two window bays. The building was constructed with 96 one-bedroom units for seniors as well as a community center named for John Lovejoy Elliott in the two-story base and extension of the building, comprised of offices, a gallery, a meeting room, and a theater on the first floor, a below-grade basketball court, and an open courtyard. Development of the Chelsea Houses Addition also involved the redesign of the adjacent open spaces and paths.

S/NR-Eligibility

SHPO determined that the Elliott-Chelsea Houses are eligible for listing on the S/NR under Criterion A in the areas of Social Historic and Politics/Government. According to SHPO, the Elliott-Chelsea Houses are significant as a physical representation of the long-held viewpoint that government was necessary to better the lives of the urban poor, and for the State and local government's acceptance of responsibility, through legislative and direct action, to assist in providing housing for low-income residents.

SHPO also determined that the Elliott-Chelsea Houses are eligible for the S/NR under Criterion C for the site plan and architectural design. The design and construction of the buildings and their placement in a designated landscape is representative of modern urban planning design theory of the period, which was characterized by the desire to place high-rise buildings within open space so as to maximize light and air in the residential units and provide abundant shared open spaces within the community. Moreover, SHPO also noted Elliott Houses for being one of the first publicly funded housing projects in New York City composed exclusively of high-rise buildings. Though the complex's site planning reflected pre-war precedents, several cost-effective construction features were introduced at Elliott Houses that would soon become hallmarks of NYCHA's housing developments, including the use of a concrete-column-and-slab structural system, redbrick cavity walls, and unfinished concrete-slab ceilings.

According to SHPO, the Elliott-Chelsea Houses are an intact and excellent representative example of the "functional Modernism" architectural style, which is typified by rapid construction and the need to minimize public expenditure on construction. In this typology, buildings reflect the utilitarian ideals of public housing, with unembellished lines and planes, flat roofs, and minimal

architectural decoration. SHPO made special note of the significance of the Elliott Houses Children’s Center as an example of Mid-Century Modern Design, with its white and blue glazed brick/tile exterior and a geometric and exaggerated butterfly roofline. SHPO also noted that the Chelsea Houses Addition is an excellent intact example of the Brutalist style, with an exposed concrete frame with redbrick walls and regular fenestration consisting of a deeply coffered grid of cast-in-place concrete window surrounds.

Building Conditions

After decades of continual use (77 years for the Elliott Houses and approximately 60 years for the Chelsea Houses and Addition), the buildings of the Elliott-Chelsea Houses, while intact, have become deteriorated and substandard. In 2022, the PACT Partner completed a comprehensive, five-month pre-design due diligence process that revealed significant capital repair needs (for, including but not limited to, deteriorated facades, outdated plumbing and electrical systems, leaks and mold, fire protection, elevators, old fixtures and appliances) and determined that extensive temporary relocation of residents would be required for rehabilitation activities to occur due to the particular conditions of major building systems. In a similar vein, NYCHA’s 2023 *Physical Needs Assessment* (PNA) for its entire portfolio of properties identified the 20-year capital need for the Elliott-Chelsea Houses to be \$255,225,394 for the Elliott Houses, \$178,933,772 for the Chelsea Houses, and \$47,501,323 for Chelsea Houses Addition, with a combined total for the Elliott-Chelsea Houses of \$481,660,489.

Secondary APEs

As shown in **Figures 05.06-1a** and **05.06-1b**, there are several S/NR-listed, LPC-designated, and eligible historic architectural resources within the secondary APEs. **Table 05.06-1** lists each historic resource within the secondary APEs, which are discussed in more detail below. Photos of the historic resources in the secondary APEs are provided in **Appendix D.3**.

Table 05.06-1: Historic Architectural Resources in the Secondary APEs

Map No. ¹	Historic Resource Name	Address / Location	Block / Lot	NHL ²	S/NR-Listed ³	S/NR-Eligible ⁴	NYCL-Designated ⁵	NYCL-Eligible ⁶
A	Chelsea Historic District	Roughly bounded by W. 20th Street, 10th Avenue, W. 23rd Street, and 8th Avenue	Multiple		X		X	
B	Gansevoort Market Historic District	Generally bounded by Gansevoort Street, West Street, W. 16th Street, and Hudson Street	Multiple		X		X	
C	West Chelsea Historic District	Roughly bounded by W. 25th Street, 12th Avenue, W. 28th Street, and 10th Avenue	Multiple			X	X	

Map No. ¹	Historic Resource Name	Address / Location	Block / Lot	NHL ²	S/NR-Listed ³	S/NR-Eligible ⁴	NYCL-Designated ⁵	NYCL-Eligible ⁶
D	Mutual Redevelopment Houses (AKA Penn South or Penn Station South)	Bounded by W. 23rd Street, 9th Avenue, W. 29th Street, and 8th Avenue	Multiple			X		
1	Merchants Refrigerating Company Warehouse	501 W. 16th Street	688 / 7501		X			
2	Bayard Rustin High School for the Humanities (former Textile High School)	351 West 18 th Street	742 / 7			X		
3	Port of New York Authority and Union Inland Terminal	111 8th Avenue	739 / 1			X		
4	R.C. Williams Warehouse	259-273 10th Avenue	697 / 31		X			
5	Houses at 437-459 W. 24th Street	437-459 W. 24th Street	722 / 6-17		X		X	
6	Church of the Holy Apostles	300 9th Avenue	751 / 76		X		X	
7	London Terrace	401 West 23 rd Street	721 / 7 & 7501			X		

Notes:¹ Refer to **Figures 05.06-1a** and **05.06-1b**.² National Historic Landmark.³ Listed on the New York State and National Registers of Historic Places.⁴ Eligible for listing on the New York State and National Registers of Historic Places.⁵ Designated a New York City Landmark.⁶ Eligible for designation as a New York City Landmark.**Chelsea Historic District**

The S/NR-listed and LPC-designated Chelsea Historic District is located just north of the Fulton Houses Project Site and extends to just south of Elliott-Chelsea Houses Project Site, as far north as W. 23rd Street. Chelsea is one of the few areas of the City which, when built along the street grid of the Commissioners' Plan of 1811¹, was developed speculatively by the owner of the estate on which it was located. Clement Clarke Moore controlled the development of the neighborhood through restrictive covenants, resulting in a high level of architectural uniformity. These covenants required the construction of low-rise, fireproof residences, set back from the street with unobstructed front yards. No stables, factories, or other nuisances were permitted in the burgeoning neighborhood. Moore also donated a large parcel to aid the construction of the Episcopal General Theological Seminary (Chelsea Square), which remains the focal point of the historic district. The majority of the Seminary was constructed in the 1880s-90s, designed by Charles Coolidge Haight

¹ The Commissioners' Plan of 1811 was the original design for the streets of Manhattan between Houston Street and 155th Street, which put in place the rectangular grid plan of east-west streets intersected by north-south avenues.

in the English Collegiate Gothic style. The West Building on W. 20th Street stands from 1834 as an early example of Gothic Revival architecture in New York, displaying an interesting array of buttresses, crenelated parapets, and conical turrets of wood.

Construction of the residences that comprise the majority of the Chelsea Historic District largely occurred between 1830 and 1860. The neighborhood is dominated by Greek Revival and Italianate brownstones, many of which still retain high stoops, elaborate ironwork railings, and grand arched doorways set back from the street behind deep yards and gardens. Immediately north of the Fulton Houses Project Site are a remarkably preserved row of Greek Revival-style residences at 406-418 W. 20th Street built by Don Alonzo Cushman in 1839-40, and a row of distinguished Italianate rowhouses at 438-450 W. 20th Street constructed in 1853. 404 W. 20th Street is the oldest extant building in the historic district, constructed in 1829-30 for Hugh Walker. St. Peter's Church, Rectory, and Parish Hall are located in the southeast corner of the secondary APE at 336-346 W. 20th Street. Built in 1838 on land also donated by Moore, St. Peter's was the first English parish Gothic church constructed in the US.

Gansevoort Market Historic District

The boundaries of the S/NR-listed and the LPC-designated Gansevoort Market Historic Districts differ, with the S/NR-listed district extending to the block south of the Fulton Houses Project Site. The historic district has a distinctive architectural character which reflects the neighborhood's long history of continuous, varied use as a marketplace with residential uses interspersed with commercial and industrial buildings. After the Civil War, as New York City solidified its position as the financial center of the country, the Gansevoort Market area served the flourishing commercial waterfront of the Hudson River. The historic district contains a predominance of one-to six-story buildings faced in brick dating from the 1880s to the 1920s, with an abundance of metal canopies originally installed for wholesale market purposes.

The National Biscuit Company (later Nabisco) moved its headquarters to the area in 1906, and by the 1920s, the company occupied five blocks in the Gansevoort neighborhood, boasting the largest baking complex in the world. The block immediately south of the Fulton Houses Project Site (69-75 9th Avenue) contains six- and eight-story lofts and bakery buildings designed by A.G. Zimmerman in 1907 for the National Biscuit Company. The former "9th Avenue Bakery" is clad in brown brick with buff terra cotta and copper ornament and features a prominent tower. It was redeveloped in the 1990s as Chelsea Market, and now accommodates retail and office spaces.

Other notable contributing resources in the Gansevoort Market Historic District located within the 400-foot secondary study area surrounding the Fulton Houses Project Site include several stables along W. 15th Street, such as 438-440 W. 15th Street (also 439-445 W. 14th Street), a red brick structure designed in 1893 by Thomas R. Jackson for the National Biscuit Company. Both facades of the building contain four bays of pair segmental- and round-arched windows, topped with a copper cornice outlining central triangular pediments. The stable was converted into a garage for Nabisco's fleet of delivery trucks in the 1920s. Additionally, the High Line (a former rail line recently converted into a public park) traverses the S/NR-listed historic district just east of 10th Avenue.

West Chelsea Historic District

The LPC-designated and S/NR-eligible West Chelsea Historic District is located to the northwest of the Elliott-Chelsea Houses Project Site. The district contains an impressive collection of industrial architecture from the late-19th and early-20th centuries, including factories and warehouses of some of the country's most prestigious industrial and freight handling firms. Many early buildings of the area have simple brick facades, rhythmically placed window openings recessed between vertical brick piers, horizontal banding, and corbelled brick cornices, whereas later buildings display the new technologies and construction techniques that revolutionized industrial design in the early-20th century, including steel building frames, terra cotta tile floors, and reinforced concrete.

Significant resources in the West Chelsea Historic District located within the secondary APE surrounding the Elliott-Chelsea Houses Project Site include the High Line which runs through the area just west of 10th Avenue and the R.C. Williams Warehouse (detailed below) at 259 10th Avenue. Further west and northwest are several factories, including the four-story, red brick structure at 521 W. 25th Street, designed by Schickel & Ditmars for the Conley Foil Company in 1900-01; the 10-story, Neo-Classical brick and reinforced concrete building at 518 W. 26th Street, designed by William Higginson in 1909-10 for the Wolff Bindery; and the 12-story, Neo-Classical brick and reinforced concrete building at 518 W. 26th Street, designed by Parker & Shaffer in 1926-27 as an annex for the H. Wolff Book Manufacturing Company. Furthermore, the six- and nine-story vernacular brick buildings at 511 W. 25th Street, 519 W. 26th Street, and 510 W. 27th Street were all speculatively developed for industrial and commercial tenants in the 1910s.

Mutual Redevelopment Houses (AKA Penn South or Penn Station South)

The S/NR-eligible Mutual Redevelopment Houses (aka Penn Station South or Penn South) is a 2,820-unit cooperative housing complex located to the east of the Elliott-Chelsea Houses Project Site. Penn South was designed by Herman Jessor in 1962-63 for the International Ladies' Garment Workers Union and the United Housing Foundation (UHF). Located at the southwest corner of the Garment District, the tower-in-the-park style complex is a physical representation of the labor movement's concern with providing affordable housing to its workers. It is comprised of 10 22-story buildings surrounded by open space, low-scale commercial buildings, and parking lots. The 10 red brick towers have regular fenestration and recessed and projecting balconies with flat balustrades. Construction of the complex required the demolition of existing brownstones and tenements in the area, and the reconfiguration of streets and blocks to create larger "superblocks." However, the project did incorporate several existing buildings within its boundaries, including the extant Church of the Holy Apostles at 300 9th Avenue (detailed below).

Merchants Refrigerating Company Warehouse

The S/NR-listed Merchants Refrigerating Company Warehouse is an 11-story trapezoidal-shaped building fronting W. 16th Street, 10th Avenue, W. 15th Street, and West Street. The reinforced concrete building, which was designed in a simplified Renaissance Revival style by John B. Snook & Sons and built by the Turner Construction Company in 1918, has minimal fenestration and ornament. It is clad in buff brick, terra cotta, granite, and cast stone, and contains large loading

bays sheltered by iron and steel canopies. The Merchants Refrigerating Company pioneered the cold storage industry by constructing the largest cold storage warehouse in the country and incorporating pressed cork board as an insulator, a newly available imported material that was a fire retardant and moisture resistant. The warehouse integrated multiple modes of transportation, connecting to truck routes, container ships, and freight rail via the High Line and along the Hudson River.

Bayard Rustin High School for the Humanities (former Textile High School)

The Textile High School was designed by Walter C. Martin in the Neo-Gothic style in 1929-30. The school is comprised of two buildings – one facing W. 18th Street and one facing W. 19th Street – which are connected midblock by a one-story structure. The Textile High School was a vocational high school for the textile trades, complete with a textile mill in the basement. The seven-story beige brick building has a limestone base and Gothic peaked pinnacles along the piers of the second floor. A stone bandcourse runs across the top of the sixth floor, and the seventh-floor features round-arched windows in pairs. The school also features stained-glass windows and a segmental arched entryway in the projecting western end of the W. 18th Street façade. It is eligible for listing on the S/NR.

Port of New York Authority and Union Inland Terminal

Now known as the Google Building, the 15-story Port of New York Authority and Union Inland Terminal occupies the entire City block bounded by W. 15th Street, 8th Avenue, W. 16th Street, and 9th Avenue. It was designed by Lusby Simpson of Abbott, Merkt & Co. in 1932 in the Art Deco style and was used as an inland terminal for the Hudson River piers, as well as a warehousing and industrial facility. The terminal was an attempt to alleviate traffic by streamlining the distribution of goods within a single location. The brick building has a granite and limestone base, with terracotta copings and finials. Other ornamentation of the building includes reoccurring seagull motifs. The upper stories of the building feature a series of setbacks. It is eligible for listing on the S/NR.

R.C. Williams Warehouse

The S/NR-listed R.C. Williams Warehouse is located to the west of the Elliott-Chelsea Houses Project Site at 259-273 10th Avenue. The site was purchased three years before plans for the High Line were officially announced, and R.C. Williams & Company would become the freight rail line's first client. The reinforced concrete building was erected in 1927-28 as a storage warehouse for the wholesale grocery firm, designed by nationally renowned architect Cass Gilbert, who pioneered concrete industrial building design. The building's three major concrete facades are broken up by broad piers to bays comprised of three rectangular windows, flanked by projecting tower-like corner bays with narrow slit windows. The first floor has loading docks with flared concrete columns inside and concrete overhangs. The main entrance is punctuated by decorative bronze lanterns.

Houses at 437-459 W. 24th Street

The 12 houses numbered 437 through 459 W. 24th Street are located on north side of the street between 9th and 10th Avenues. Constructed in pairs with adjoining stoops and entranceways, the brick houses stand three stories tall and three bays wide. At the time of their construction in 1849-50, these residences were among the larger and more imposing houses in the Chelsea area, designed to house the increasing number of professionals drawn to the newly developing area prior to the Civil War. Erected by local builder Philo V. Beebe, the houses are transitional in style, with basic elements of Greek Revival embellished by more Italianate style roof cornices and delicate ironwork for the stoops and yard railings. The houses are largely intact, retaining their 15-foot-deep front yards, modillioned cornices, and elaborate ironwork, and are listed on the S/NR and are designated NYCLs.

Church of the Holy Apostles

The Church of the Holy Apostles at 300 9th Avenue was designed in 1846-48 by Minard Lafever, a nationally prominent architect of the 19th century. The Italianate brick church has round-arched windows, arched pediments, and geometric stained-glass windows designed by William Jay Bolton. It is dominated by a tall, octagonal steeple enhanced with unusual detail. An addition to the eastern portion of the church was constructed in 1854, and in 1858 transepts were added by architect Charles Babcock of Richard Upjohn & Son, creating a cross-shaped sanctuary. Another major alteration to the church occurred in 1908, when the wooden spire was covered with slate and the belfry clad in copper. The Church of the Holy Apostles is the only extant church in Manhattan designed by Lafever and is listed on the S/NR and is a designated NYCL.

London Terrace

London Terrace is comprised of 1,700 residential apartments and occupies the entire City block bounded by W. 23rd Street, 9th Avenue, W. 24th Street, and 10th Avenue. It was built by the Henry Mandel Companies in 1929-30 to the designs of Victor C. Farrar. When constructed, it was the largest apartment building in the world, complete with restaurants, a pool, gym, gardens, and other amenities. London Terrace was designed to provide a short walk to Midtown Manhattan offices, offering modern affordable housing for white collar workers. It contains 14 contiguous red brick buildings ranging in height from 17 to 19 stories. London Terrace features a stone base and setbacks at the upper floors. It is eligible for listing on the S/NR.

E. ENVIRONMENTAL EFFECTS

Alternative 1 – No-Action Alternative

In the No-Action Alternative, no new buildings would be constructed on the Project Sites and the existing residential and community facility uses and structures would remain. No significant alterations, site reconfigurations, or demolitions to the Fulton Houses or the S/NR-eligible Elliott Houses, Chelsea Houses, or Chelsea Houses Addition would occur in the No-Action Alternative. Additionally, major capital improvements, rehabilitation, or renovations subject to discretionary

approvals such as the PACT/RAD rehabilitation program, would not occur on the Project Sites. Routine maintenance and repairs would be carried out by NYCHA, including general bathroom renovations, boiler replacement, and roof repairs.

Separate from the Proposed Project, NYCHA has authorized the PACT Partner to undertake improvements at the Project Sites' existing buildings, including enhanced security, increased pest control, and proactive maintenance of heating systems, intended to improve the safety, security, living conditions, and quality of life for residents. These improvements are not contingent upon completion of the environmental review and approval process for the Proposed Project, and as such, are considered part of the No-Action Alternative. They are referred to as the Maintenance and Operations Improvements at Fulton, Elliott, Chelsea, and Chelsea Addition Houses project. These improvements and routine maintenance and repairs would not fully remedy the serious deterioration that is the root cause of many of the building conditions.

The No-Action Alternative would not meet the purpose and need for the Proposed Project, because it would not significantly improve the quality of life for existing NYCHA residents, would not provide new units to existing NYCHA residents, and would not create any additional affordable or market-rate housing on the Project Sites.

Direct (Physical) Impacts

As detailed above, the primary APEs encompass one historic architectural resource on the Elliott-Chelsea Houses Project Site: the S/NR-eligible Elliott-Chelsea Houses. The buildings of the Elliott-Chelsea houses currently exhibit deteriorated brick facades, mold and leaks, and the presence of lead-based paint, and they have outdated elevators, outdated heating, ventilation, mechanical and electrical systems, and old fixtures and appliances. Further, anticipated capital repair costs fall short of both the five-year and 20-year capital investment needs identified by the PNA for the property. With no change in funding expected in the coming years, it is not feasible to assume that NYCHA would be able to fully fund the capital needs identified in the PNA for the site, and as such, the existing buildings of the Elliott-Chelsea Houses Project Site would largely remain in their current substandard condition and would continue to deteriorate in the No-Action Alternative. The continued deterioration of the Elliott-Chelsea Houses would likely diminish many of the attributes that qualify it for listing on the S/NR. Therefore, it is possible that the No-Action Alternative would result in direct impacts to this historic resource.

Indirect (Contextual) and Shadows Impacts

As the No-Action Alternative does not involve the construction of new buildings or structures on the Project Sites, or changes to the existing bulks or heights of buildings on the Project Sites, it would not have the potential to result in any significant adverse indirect or contextual impacts to surrounding historic resources in the secondary APEs. No incompatible visual, audible, or atmospheric elements would be introduced, and no new (incremental) shadows would be cast on surrounding sunlight-sensitive features of historic structures.

As detailed in **Chapter 05.01**, there is one planned development slated for completion within the S/NR-listed Penn South Campus in the No-Action Alternative: a seven-story residential building with ground-floor retail space will be constructed at 335 8th Avenue at the corner of W. 27th

Street. This new structure will alter the configuration and context of the S/NR-listed campus, and would obstruct some public views of the historic campus from surrounding streets and sidewalks. No public views of any other historic resources in the study areas would be eliminated or altered, and no changes to the visual settings of any other historic resources would occur in the No-Action Alternative.

Construction-Related Impacts

No new construction would take place on the Project Sites in the No-Action Alternative. Therefore, no potential construction-related impacts would occur on surrounding historic resources in the No-Action Alternative.

Alternative 2 – Rezoning Alternative and Alternative 4 – Midblock Bulk Alternative

Under the Rezoning Alternative and Midblock Bulk Alternative there would be a staged demolition and replacement of all existing buildings on the two Project Sites. Existing residential and community facility spaces would be replaced, and additional development would occur on both Project Sites, including new mixed-income buildings with ground-floor commercial and community facility use, and accessory open spaces for residents.

The Rezoning Alternative and Midblock Bulk Alternative would result in the demolition of all 22 buildings currently on the Project Sites and the development of 15 new buildings (Rezoning Alternative) or 16 new buildings (Midblock Bulk Alternative), all ranging from 12 to 39 stories. The newly constructed buildings on each of the Project Sites would be built out to the lot lines, creating cohesive street walls with active uses oriented towards the sidewalk that more compatibly reflect the predominant existing built form of the secondary study area. This style would be more contextually appropriate than the tower-in-the-park-style buildings, currently only found on the Project Sites and within Penn South. Refer to **Chapter 02.0** for figures illustrating the location of the proposed buildings in the Rezoning Alternative and Midblock Bulk Alternative on each of the Project Sites.

Direct (Physical) Impacts

The Rezoning Alternative and Midblock Bulk Alternative would result in the demolition of the existing S/NR-eligible buildings on the Elliott-Chelsea Houses Project Site and the construction of seven new buildings on that Project Site. As such, the Rezoning Alternative would result in significant adverse direct impacts to the S/NR-eligible historic resource.

As detailed above, a Section 106 Alternatives Analysis was conducted for the Proposed Project (provided in **Appendix D.2**) that considers alternatives to the demolition of the Elliott-Chelsea Houses with the goal of avoiding or minimizing the adverse effect, but concludes that there is no prudent and feasible alternative to the demolition of the S/NR-eligible Elliott-Chelsea Houses in consideration of the Proposed Project's purpose and need. SHPO concurred with this determination on October 1, 2024 (see **Appendix D.1**). The demolition of the Elliott-Chelsea Houses under the Rezoning Alternative would result in an adverse effect to a historic resource but would allow for the construction of a financially viable project that would improve the quality of

life and housing stability for existing NYCHA residents of the deteriorating buildings and directly address the critical shortage of affordable housing in New York City.

As such, NYCHA, HPD, and the PACT Partner have worked with SHPO and Section 106 consulting parties to develop measures to partially mitigate the adverse effect of demolishing the Elliott-Chelsea Houses, as set forth in a draft MOA pursuant to Section 106 of the NHPA provided in **Appendix D.2**. As detailed in the draft MOA and discussed in **Chapter 05.21**, proposed mitigation measures include:

1. The preparation of an Unanticipated Discoveries Protocol.
2. A HABS Level 2 recordation of the Elliott-Chelsea Houses.
3. The design and installation in a publicly accessible location of an interpretive display that adequately presents the history and significance of the Elliott-Chelsea Houses.
4. The development and implementation of Construction Protection Plans for surrounding historic properties within 90 feet of the Project Site.
5. Review and approval of all plans, final reports, studies, and Construction Protection Plans detailed above by SHPO, LPC, and the Historic Districts Council (the Section 106 consulting parties).

Indirect (Contextual) and Shadows Impacts

The Rezoning Alternative and Midblock Bulk Alternative would not result in significant adverse indirect impacts on historic architectural resources within either of the secondary APEs. The Rezoning Alternative and Midblock Bulk would not significantly alter the context or setting of any historic architectural resources in the secondary APEs as compared to the No-Action Alternative. They would result in the construction of 15 new buildings (Rezoning Alternative), or 16 new buildings (Midblock Bulk Alternative), all ranging between 12 to 39 stories, which would be built out to the lot lines of the primary APEs, creating uniform street walls as compared to the No-Action Alternative. The proposed new buildings in the primary APEs would be visible when looking north from within the Gansevoort Market and Chelsea Historic Districts, south from the Chelsea Historic District, east from the West Chelsea Historic District, and west from Penn South. The proposed new buildings in the primary APEs would also be visible when looking west at the Merchants Refrigerating Company Warehouse along W. 16th and W. 17th Streets west of 10th Avenue; when looking north at the Port of New York Authority & Union Inland Terminal along 9th Avenue; when looking west at the R.C. Williams Warehouse along W. 25th and W. 26th Streets west of 10th Avenue; when looking north at the Houses at 437-459 W. 24th Street from W. 24th Street; and when looking south at the Church of the Holy Apostles along 9th Avenue. Nevertheless, the views of these new buildings would not present significant adverse impacts to the character of any of the historic resources in the secondary APEs.

The Rezoning Alternative and Midblock Bulk Alternative would not substantially change the visual setting of any historic resources in the secondary APEs so as to affect those characteristics that make them eligible for listing on the S/NR or designation as a NYCL. The secondary APEs are dense urban environments with a plethora of existing mid- and high-rise buildings that currently form the backdrop for these historic architectural resources. Moreover, as detailed further in **Chapter 05.01**, new mid- and high-rise buildings are planned for construction in the secondary APEs in the No-Action Alternative, including an 11-story residential/commercial building

immediately west of the Fulton Houses Project Site at 428 W. 19th Street; a 36-story residential/commercial building farther to the west of the Fulton Houses Project Site at 76 11th Avenue; and a seven-story residential/commercial building to the east of the Elliott-Chelsea Houses Project Site at 335 8th Avenue.

In the Rezoning Alternative and Midblock Bulk Alternative, no incompatible visual, audible, or atmospheric elements would be introduced to the settings of historic resources in the secondary APEs. They would not alter the relationship of any identified historic architectural resources in the secondary APEs to the streetscape, as all streets in the secondary APEs would remain open and all historic resources' relationships to these streets would remain unchanged. They would not eliminate or screen public views of any historic architectural resources in the secondary APEs, which would remain visible in view corridors on adjacent public streets and sidewalks. No primary façades, significant architectural ornamentation, or notable features of individual landmarks in the secondary APEs, or any contributing buildings within the Chelsea, Gansevoort Market, or West Chelsea Historic Districts or Penn South would be obstructed by the Rezoning Alternative or Midblock Bulk Alternative.

Additionally, as detailed in **Chapter 05.05, "Shadows,"** the Rezoning Alternative and Midblock Bulk Alternative would not result in significant adverse shadow impacts to nearby sunlight-sensitive historic resources. The Rezoning Alternative and Midblock Bulk Alternative would result in incremental shadow coverage on the LPC-designated and S/NR-listed Church of the Holy Apostles, which features stained-glass windows. However, incremental shadows from these alternatives cast on this sunlight-sensitive feature of the historic church would generally be limited in duration and/or size, and would not affect public use or enjoyment of this historic resource.

The Rezoning Alternative, and Midblock Bulk Alternative would not result in development that would diminish the qualities that make the LPC-designated (or eligible) and/or S/NR-listed (or eligible) landmarks and historic districts of the secondary APEs historically and architecturally significant. As such, the Rezoning Alternative and Midblock Bulk Alternative would not result in any significant adverse indirect or contextual impacts on historic architectural resources in the secondary APEs.

Construction-Related Impacts

As shown in **Figures 05.06-1a** and **05.06-1b**, the primary APEs are located within 90 feet of multiple LPC-designated and S/NR-listed historic resources (including properties within the S/NR-listed Gansevoort Market Historic District; properties within the LPC-designated Chelsea Historic District, such as the S/NR-listed R.C. Williams Warehouse; and properties within the LPC-designated and S/NR-eligible West Chelsea Historic District). As these historic resources are S/NR-listed and/or LPC-designated, construction of the Proposed Project would be subject to DOB's *TPPN #10/88*. Under *TPPN #10/88*, a Construction Protection Plan would be provided to LPC for review and approval prior to the commencement of any construction work on the Project Sites within 90 feet of a designated or listed historic resource. The Construction Protection Plan would take into account the guidance provided in *CTM*, Chapter 9, Section 522, "Construction Protection Plan," and would be implemented in conjunction with construction. Only historic district buildings located within 90 feet of project construction would be included in the Construction Protection Plan. As such, no construction-related impacts on historic resources would

occur as a result of the Proposed Project under the Rezoning Alternative or Midblock Bulk Alternative.

Alternative 3 – Non-Rezoning Alternative

The conclusion of the historic and cultural resources assessment for the Rezoning and Midblock Bulk Alternatives that such alternatives would result in significant adverse direct impacts to the S/NR-eligible historic resource, but would not result in significant adverse indirect impacts on historic architectural resources within either of the secondary APEs or construction-related impacts on historic resources, would also apply to the Non-Rezoning Alternative. The Rezoning and Midblock Bulk Alternatives represent a higher potential for environmental impact than the Non-Rezoning Alternative since the Non-Rezoning Alternative has a smaller development program and less overall bulk. As discussed above, NYCHA, HPD, and the PACT Partner have worked with SHPO and Section 106 consulting parties to develop measures to partially mitigate the adverse effect, set forth in a draft MOA pursuant to Section 106 of the NHPA provided in **Appendix D.2** and discussed in **Chapter 05.21**.