

**Appendix D.1**  
**Comment Letters from the Consulting Parties**



January 29, 2025

Taylor Goldman  
NYCHA  
24-02 49th Ave  
Long Island City, NYC, NY 11101

Re: HUD  
Fulton Elliott-Chelsea Houses PACT  
NY  
23PR06218

Dear Taylor Goldman:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the provided documentation in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include other environmental impacts to New York State Parkland that may be involved in or near your project.

The Archaeology Unit has reviewed the submitted project and it is the opinion of New York SHPO that no archaeological resources will be affected by this undertaking and recommend that no additional archaeological work is necessary.

Please note that these comments pertain only to archaeological resources. Please continue to consult with Olivia Brazee in the Technical Preservation Services Unit at [Olivia.Brazee@parks.ny.gov](mailto:Olivia.Brazee@parks.ny.gov). If you have any questions concerning archaeology, I can be reached at [Jessica.Vavrsek@parks.ny.gov](mailto:Jessica.Vavrsek@parks.ny.gov).

Sincerely,

Jessica Vavrsek, Ph.D.  
Scientist – Archaeology/NAGPRA



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**RANDY SIMONS**  
Commissioner *Pro Tempore*

October 1, 2024

Taylor Goldman  
Senior Environmental Analyst  
NYCHA  
24-02 49th Ave  
Long Island City, NYC, NY 11101

Re: HUD  
Fulton Elliott-Chelsea Houses PACT  
23PR06218

Dear Taylor Goldman:

Thank you for continuing to consult with the New York State Historic Preservation Office (SHPO). We have reviewed the documentation submitted in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

We have reviewed the Alternatives Analysis document dated September 12<sup>th</sup>, 2024 and the Draft Environmental Impact Statement chapter excerpts that were provided to our office on September 12<sup>th</sup> and 20<sup>th</sup>, 2024. Based upon our review, the SHPO concurs with the determination that there are no prudent and feasible alternatives to the project as proposed, which includes the Adverse Effect of demolition of the State and National Register-Eligible Elliott-Chelsea Houses.

Please continue consultation with Consulting Parties and please also begin development of a Memorandum of Agreement that will include appropriate mitigation stipulations to take into account the effect on the undertaking on historic properties. We would be happy to have a meeting to discuss potential mitigation items.

If you have any questions, feel free to call me at (518)948-2067.

Sincerely,

Olivia Brazee  
Senior Historic Site Restoration Coordinator  
olivia.brazee@parks.ny.gov

cc: CRIS list

via e-mail only

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**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [parks.ny.gov](https://parks.ny.gov)

• 518-237-8643 • <https://parks.ny.gov/shpo> •



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

October 19, 2023

Taylor Goldman  
Senior Environmental Analyst  
NYCHA  
24-02 49<sup>th</sup> Ave  
Long Island City, NYC, NY 11101

Re: HUD  
Fulton Elliott-Chelsea Houses PACT  
23PR06218

Dear Taylor Goldman:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the provided documentation in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include other environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (NY Environmental Conservation Law Article 8).

We note that our office has determined that the Fulton Houses complex is Not Eligible for listing in the State and National Registers of Historic Places; and that the Elliott-Chelsea Houses complex is eligible for listing in the State and National Registers of Historic Places. Please see the Determination of Eligibility attached here. We have reviewed the project description and supporting documentation that was provided to our office on October 12<sup>th</sup>, 2023. Base upon our review, we understand that the proposal entails demolition and redevelopment of both complexes. Demolition of historic resources is by definition an Adverse Effect that requires a study of alternatives that could potentially avoid or minimize the adverse effects. Please initiate the Section 106 consultation process, and at this time we request preparation of an Alternatives Analysis for Elliott-Chelsea Houses.

If you have any questions, I am best reached via e-mail.

Sincerely,

Olivia Brazee  
Historic Site Restoration Coordinator  
olivia.brazee@parks.ny.gov

cc: CRIS list

via e-mail only



## **ENVIRONMENTAL REVIEW**

**Project number:** NYC HOUSING AUTHORITY / 23CHA001M

**Project:** FULTON CHELSEA ELLIOTT HOUSES

**Date Received:** 10/23/2024

**Comments:** as indicated below. Properties that are individually LPC designated or in LPC historic districts require permits from the LPC Preservation department. Properties that are S/NR listed or S/NR eligible require consultation with SHPO if there are State or Federal permits or funding required as part of the action.

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**Comments:**

The LPC is in receipt of the Historic and Cultural Resources chapter of the DEIS dated 9/20/24. The document appears acceptable.

Cc: SHPO



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10/1/2024

SIGNATURE

Gina Santucci, Environmental Review Coordinator

DATE

**File Name:** 37076\_FSO\_GS\_10012024.docx

## **ENVIRONMENTAL REVIEW**

**Project number:** NYC HOUSING AUTHORITY / 23CHA001M

**Project:** FULTON CHELSEA ELLIOTT HOUSES

**Date Received:** 9/16/2024

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**Comments:**

The LPC is in receipt of the Shadows Chapter of the DEIS dated 9/13/24. The document appears acceptable for historic and cultural resources.

Cc: SHPO



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9/17/2024

SIGNATURE

DATE

Gina Santucci, Environmental Review Coordinator

**File Name:** 37076\_FSO\_GS\_09172024.docx

## **ENVIRONMENTAL REVIEW**

**Project number:** NYC HOUSING AUTHORITY / 23CHA001M

**Project:** FULTON CHELSEA ELLIOTT HOUSES

**Date Received:** 5/18/2023

**Comments:** as indicated below. Properties that are individually LPC designated or in LPC historic districts require permits from the LPC Preservation department. Properties that are S/NR listed or S/NR eligible require consultation with SHPO if there are State or Federal permits or funding required as part of the action.

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**Properties with no Architectural or Archaeological significance:**

- 1) 430 WEST 17 STREET, BBL: 1007140031
- 2) 117 NINTH AVENUE, BBL: 1007150010
- 3) 401 WEST 18 STREET, BBL: 1007160017
- 4) 401 WEST 19 STREET, BBL: 1007170019
- 5) 264 10 AVENUE, BBL: 1007230001
- 6) 407 WEST 25 STREET, BBL: 1007230015
- 7) 278 10 AVENUE, BBL: 1007240001
- 8) 441 WEST 26 STREET, BBL: 1007240010
- 9) 427 WEST 26 STREET, BBL: 1007240015

**Comments:**

LPC defers to SHPO regarding determination of National Register eligibility for both project sites.

LPC DESIGNATED AND S/NR LISTED CHELSEA HISTORIC DISTRICT AND GANSEVOORT MARKET HISTORIC DISTRICT; S/NR ELIGIBLE BAYARD RUSTIN HIGH SCHOOL FOR HUMANITIES (FORMER TEXTILE HIGH SCHOOL), 351 WEST 18 STREET AND PORT OF NEW YORK AUTHORITY AND UNION INLAND TERMINAL, 111 EIGHTH AVENUE WITHIN RADIUS OF **FULTON HOUSES.**

LPC DESIGNATED WEST CHELSEA HISTORIC DISTRICT AND HOUSES AT 437-459 WEST 24 STREET; S/NR LISTED WILLIAMS WAREHOUSE, 259-273 TENTH AVENUE AND HOUSES AT 437-459 WEST 24 STREET; S/NR ELIGIBLE WEST CHELSEA HISTORIC DISTRICT; MUTUAL REDEVELOPMENT HOUSES (AKA PENN SOUTH OR PENN STATION SOUTH); AND LONDON TERRACE, 401 WEST 23 STREET WITHIN RADIUS **OF CHELSEA-ELLIOTT HOUSES.**

LPC DESIGNATED AND S/NR LISTED CHURCH OF THE HOLY APOSTLES, 300 NINTH AVENUE ADJACENT TO RADIUS.

CC: SHPO



6/12/2023

SIGNATURE

Gina Santucci, Environmental Review Coordinator

DATE

**File Name:** 37076\_FSO\_DNP\_05302023.docx

**Appendix D.2**  
**Draft Memorandum of Agreement (MOA) and Alternatives Analysis**

**DRAFT MEMORANDUM OF AGREEMENT  
BETWEEN  
THE NEW YORK CITY DEPARTMENT OF HOUSING PRESERVATION AND  
DEVELOPMENT,  
THE NEW YORK STATE HISTORIC PRESERVATION OFFICE,  
AND  
THE NEW YORK CITY HOUSING AUTHORITY  
REGARDING  
THE FULTON AND ELLIOTT-CHELSEA HOUSES REDEVELOPMENT PROJECT  
NEW YORK CITY, NEW YORK**

**SHPO#23PR06218**

**WHEREAS**, the New York City Department of Housing Preservation and Development (“HPD”), as Responsible Entity for the United States Department of Housing and Urban Development (“HUD”) and lead agency under the National Environmental Policy Act of 1969 (“NEPA”) in accordance with Title 24, Code of Federal Regulations (“CFR”), Section 58.2(a)(7) [24 CFR 58.2(a)(7)], and the New York City Housing Authority (“NYCHA”), serving as local project sponsor and joint lead agency in accordance with 40 CFR 1501.7(b), propose the staged replacement and demolition of all existing dwelling unit and community facility spaces across NYCHA’s Fulton, Elliott, Chelsea, and Chelsea Addition Houses campuses (collectively, the “Project Sites”) in the Chelsea neighborhood of Manhattan, New York City, as well as the staged development of additional mixed-use buildings across the Project Sites (the “Proposed Project”) (see **Exhibit A – Project Location**); and

**WHEREAS**, as part of the Permanent Affordability Commitment Together (“PACT”) Program, NYCHA intends to submit an application(s) to HUD for disposition of public housing property as authorized under Section 18 of the United States Housing Act of 1937 as amended and implementing regulations at 24 CFR part 970 (Section 18) and the Rental Assistance Demonstration (“RAD”) Program created by the Consolidated and Further Continuing

Appropriations Act of 2012, as amended, for the conversion of subsidies under Section 9 of the United States Housing Act of 1937 (Title 42, United States Code, Section 1437g [42 U.S.C. § 1437g]) to project-based vouchers (PBVs) subsidies under Section 8 of the United States Housing Act of 1937 (42 U.S.C. § 1437f); and

**WHEREAS**, NYCHA will enter into 99-year ground leases involving the Project Sites with Elliott Fulton LLC (the “PACT Partner”); and

**WHEREAS**, the Project Sites would be redeveloped with 2,056 replacement PBV dwelling units, up to 3,454 mixed-income dwelling units, and retail, supermarket, community facility, and medical office space; and

**WHEREAS**, the purpose of the Proposed Project is to improve the quality of life and housing stability for the existing public housing residents of the Project Sites and facilitate the construction of new Project-Based Section 8 housing for all existing NYCHA residents (replacing all existing 2,056 NYCHA housing units), while also preserving permanent affordability and residents’ rights under the PACT Program; and

**WHEREAS**, the purpose of the Proposed Project is also to facilitate the construction of additional affordable and market rate housing units to address the critical shortage of affordable housing and housing in general in New York City and to financially support the PACT portion of the Proposed Project; and

**WHEREAS**, the Proposed Project would also facilitate the development of space for additional community facility and retail uses and accessory open space for the benefit of NYCHA residents and the surrounding community; and

**WHEREAS**, HPD has accepted legal responsibility for compliance with Section 106; and

**WHEREAS**, there are two primary Areas of Potential Effect (“APEs”) for the project—the Fulton Houses Project Site and the Elliott-Chelsea Houses Project Site—and two secondary APEs extending 400 feet from the Project Sites, as defined by 36 CFR 800.16(d), in which construction and operation of the project may directly or indirectly affect Historic Properties (The APEs for the Proposed Project are depicted on the maps presented in **Exhibit B – Areas of Potential Effect**); and

**WHEREAS**, there is one Historic Property in the primary APEs—the State- and National Register-eligible Elliott-Chelsea Houses—and eleven Historic Properties within the secondary APEs that could be directly or indirectly affected by the Proposed Project (**Exhibit C – Historic Properties in the Secondary APEs**); and

**WHEREAS**, in a letter dated June 12, 2023, the New York City Landmarks Preservation Commission (“LPC”) determined that the Project Sites have no archaeological significance, and the New York State Historic Preservation Office (the “SHPO”) concurred in October 2023 that the Proposed Project will have no adverse effects on archaeological resources; and

**WHEREAS**, in consultation with SHPO pursuant to 36 CFR 800, it was determined that the Proposed Project will have an adverse effect on the Elliott-Chelsea Houses, which were determined eligible for listing on the State and National Registers of Historic Places in a letter from SHPO dated October 19, 2023 (see **Exhibit D - Determination Letter from SHPO**); and

**WHEREAS**, HPD and NYCHA, in consultation with the SHPO, have considered alternatives to avoid or minimize the adverse effect to the Elliott-Chelsea Houses and determined that the Proposed Project is the only feasible and prudent alternative, and in a letter dated October 1, 2024, SHPO concurred with this determination (see **Exhibit E - Alternatives Analysis for Section 106 Consultation**); and

**WHEREAS**, the Proposed Project is located within the identified area of interest of four federally recognized Indigenous Nations, and HPD and NYCHA have invited the Delaware Nation, the Delaware Tribe of Indians, the Shinnecock Nation, and the Stockbridge-Munsee Band of Mohicans on a government-to-government basis in accordance with 36 CFR Part 800.2(c)(ii) to participate in the Section 106 process, and the Delaware Nation, the Delaware Tribe of Indians, the Shinnecock Nation, and the Stockbridge-Munsee Band of Mohicans have declined to participate; and

**WHEREAS**, HPD and NYCHA invited the Advisory Council on Historic Preservation (“ACHP”) to participate in the Section 106 process for the Proposed Project and ACHP has declined to participate; and

**WHEREAS**, in keeping with 36 CFR 800.2(c)(3) and (5), HPD and NYCHA identified representatives of local governments, individuals, and organizations with a demonstrated interest in the undertaking, and has invited them to participate in Section 106 consultation for the Proposed Project as Consulting Parties. (The invited Section 106 Consulting Parties for the Proposed Project are presented in **Exhibit F – Consulting Parties**); and

**WHEREAS**, the PACT Partner has accepted the invitation to be an invited signatory to this Agreement; and

**WHEREAS**, LPC, an agent of the City of New York, has been consulted in the Section 106 review process and has accepted the invitation to be a Consulting Party and accordingly is a concurring party to this Agreement; and

**WHEREAS**, the Historic Districts Council accepted the invitation to be a Consulting Party and is accordingly a concurring party to this Agreement; and



**NOW, THEREFORE**, the signatories agree that the Proposed Project shall be implemented in accordance with the following stipulations to avoid, minimize, and mitigate Adverse Effects in order to satisfy Section 106.

## STIPULATIONS

HPD, NYCHA, and the PACT Partner will ensure, in coordination with SHPO, that the following stipulations are implemented.

### **I. UNANTICIPATED DISCOVERIES PROTOCOL**

An Unanticipated Discoveries Protocol for both archaeological and historic architectural resources shall be prepared and submitted to SHPO and LPC for review and approval prior to any project excavation and construction activities. The Unanticipated Discoveries Protocol shall also be submitted for review to the Delaware Nation, Delaware Tribe of Indians, the Stockbridge-Munsee Band of Mohicans, and the Shinnecock Nation. The Unanticipated Discoveries Protocol will include procedures for human remains and non-human remains archaeological resources in the event that any unanticipated archaeological resources are encountered during construction of the Proposed Project. The procedures for human remains will follow SHPO's *Human Remains Discovery Protocol* (January 2021) (see **Exhibit G- Human Remains Discovery Protocol**). The Unanticipated Discoveries Protocol will also include procedures in the event any previously unidentified historic architectural resource is discovered or if known historic properties are affected in an unanticipated manner.

### **II. RECORDATION**

The PACT Partner will undertake Historic American Buildings Survey ("HABS") Level 2 recordation of the Elliott-Chelsea Houses prior to the start of construction of the Proposed Project. Recordation shall consist of:

1. Two sets of black and white photographs (4- by 5-inch prints on archival paper) and one set of 4- by 5-inch negatives that record the exterior appearance and interior spaces of the Elliott-Chelsea Houses, with up to [TBD] photographs of each building:
2. Measured drawings are not required but a good faith effort shall be made to locate exterior elevations and floor plans of the Elliott-Chelesea Houses in the NYCHA archives and appropriate civic and historic repositories. If located, copies shall be included in the recordation submission.
3. A historic narrative pertaining to the history of the buildings shall be prepared to illustrate the historic and architectural significance of the Elliott-Chelsea Houses. The narrative will provide an appropriate historic context for the housing campus.
4. The SHPO will have 30 calendar days from receipt of the draft report to review and provide written comments.
5. One copy of the report will be prepared. The report will be submitted to the SHPO for forwarding to the New York State Archives, which will include one set of archival negatives and an archival compact disc containing the report. A digital copy of the report will also be uploaded to SHPO's on-line Cultural Resource Information System (CRIS).

### **III. INTERPRETIVE SIGNAGE**

1. The PACT Partner, using the services of a person meeting the Secretary of the Interior's Professional Qualification Standards (48 FR 44738-9) in History and/or Architectural History, shall design an interpretive display that adequately presents the history and significance of the State- and National Register-eligible Elliott-Chelsea Houses, and shall

propose a publicly accessible location on the Elliott-Chelsea Houses Project Site for the installation of the interpretive display by [DATE TBD].

2. The display shall consist of a durable color panel or panels that shall incorporate historic photographs and/or maps, as well as text regarding specific historic themes to be identified in consultation with the SHPO.
3. Mock-ups illustrating the content, size, and text of the signage, as well as proposed sign locations on the Project Site, shall be submitted to the SHPO for review and comment; and SHPO will have 30 days for this review. Review for display materials can run concurrently with other review timelines described herein. The final display panels will take into consideration the comments provided by SHPO. SHPO shall provide approval within 14 days of final versions prior to fabrication.
4. The display materials shall be installed, and verification of installation shall be provided to the SHPO no later than three (3) months following the completion of the last NYCHA replacement building on the Project Site.

#### **IV. CONSTRUCTION PROTECTION PLANS**

1. Prior to the commencement of construction for any building of the Proposed Project that is located within 90 feet of one of four Historic Properties (identified below), the PACT Partner, in consultation with SHPO and LPC, shall develop and implement a Construction Protection Plan for that Historic Property to avoid inadvertent construction-period damage from ground-borne vibrations, falling debris, collapse, dewatering, subsidence, or construction equipment. (The remaining seven of the 11 Historic Properties within the secondary APEs are not located close enough to project construction—within 90 feet—to

potentially experience inadvertent construction-related damage.) The Construction Protection Plans shall include provisions that the construction manager will follow to evaluate potential adverse effects on the Historic Properties. These provisions shall include protective measures such as monitoring during construction to detect vibration or other physical impact. The plans shall follow the guidelines of the New York City Department of Building's *Technical Policy and Procedure Notice #10/88*, which "requires a monitoring program to reduce the likelihood of construction damage to adjacent historic structures and to detect at an early stage the beginnings of damage so that construction procedures can be changed." The Construction Protection Plans shall also be prepared in accordance with LPC's guidance document *Protection Programs for Landmarked Buildings* and the National Park Service's *Preservation Tech Notes, Temporary Protection #3: Protecting a Historic Structure during Adjacent Construction*.

2. The Historic Properties to be included in the Construction Protection Plans are: the R.C. Williams Warehouse (State and National Register listed), Gansevoort Market Historic District (State and National Register eligible), Chelsea Historic District (New York City Landmark), and the West Chelsea Historic District (New York City Landmark, State and National Register eligible). Of the three historic districts, only historic district buildings located within 90 feet of project construction will be included in the Construction Protection Plans.
3. NYCHA shall ensure that all appropriate Historic Properties are included in the Construction Protection Plans and thereafter ensure that the provisions of the Construction Protection Plans are included in the Construction Documents and implemented by the project contractors.

4. The Construction Protection Plans shall be submitted to SHPO, LPC, and the Historic Districts Council. SHPO, LPC, and the Historic Districts Council shall provide written concurrence or comments within 30 days.
5. Within 10 days, the PACT Partner shall respond in writing to any comments on the Construction Protection Plans.

## **V. REPORTING AND OVERSIGHT**

1. The PACT Partner shall provide to SHPO, LPC, and the Historic Districts Council all final reports, studies, and Construction Protection Plans resulting from this Agreement.
2. SHPO, LPC, and the Historic Districts Council shall provide written concurrence or comments within 30 calendar days of receipt of draft and final reports, studies, and Construction Protection Plans. The PACT Partner will take all written comments into consideration. If no comments are received, the PACT Partner may consider SHPO, LPC, and the Historic Districts Council in concurrence.
3. The PACT Partner shall maintain records of all activities undertaken pursuant to this Agreement.

On or before December 31 of each year, until this Agreement expires or is terminated, the PACT Partner shall provide all parties to the Agreement a summary report detailing all work carried out pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received while carrying the terms of this Agreement.

## **VI. DISPUTE RESOLUTION**

Should any signatory or concurring party to this Agreement object at any time to any actions proposed or the manner in which the terms of this Agreement are implemented, HPD shall consult with such party to resolve the objection. If HPD determines that such objection cannot be resolved, HPD will:

1. Forward all documentation relevant to the dispute, including HPD's proposed resolution, to the ACHP. The ACHP shall provide HPD with its advice on the resolution of the objection within 30 days of receiving adequate documentation. Prior to reaching a final decision on the dispute, HPD shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. HPD will then proceed according to its final decision.
2. If the ACHP does not provide its advice regarding the dispute within the 30 day time period, HPD may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, HPD shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to this Agreement and provide them and the ACHP with a copy of such written response.
3. HPD's responsibility to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute remain unchanged.

## **VII. DURATION, AMENDMENT, AND TERMINATION**

1. This Agreement shall take effect on the date it is signed by the last signatory and will remain in effect until five (5) years after completion of the Proposed Project.

2. This Agreement may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date when all the signatories have signed it.

If any signatory to this Agreement determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment.

**EXECUTION OF THIS MEMORANDUM OF AGREEMENT** and implementation of its Stipulations evidences that HPD and NYCHA have taken into account the effects of the Proposed Project on Historic Properties.



**APPROVAL AND SIGNATURE PAGE FOR MEMORANDUM OF AGREEMENT**

**Between**

**The New York City Department of Housing Preservation and Development,**

**The New York State Historic Preservation Office,**

**and**

**The New York City Housing Authority**

**Regarding**

**The Fulton and Elliott-Chelsea Houses Redevelopment Project**

**New York City, New York**

**NYC DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT**

By: \_\_\_\_\_

Name:

Title:

Date: \_\_\_\_\_

**APPROVAL AND SIGNATURE PAGE FOR MEMORANDUM OF AGREEMENT**

**Between**

**The New York City Department of Housing Preservation and Development,**

**The New York State Historic Preservation Office,**

**and**

**The New York City Housing Authority**

**Regarding**

**The Fulton and Elliott-Chelsea Houses Redevelopment Project**

**New York City, New York**

**NEW YORK STATE HISTORIC PRESERVATION OFFICE**

By: \_\_\_\_\_

Name:

Title:

Date: \_\_\_\_\_

**APPROVAL AND SIGNATURE PAGE FOR MEMORANDUM OF AGREEMENT**

**Between**

**The New York City Department of Housing Preservation and Development,**

**The New York State Historic Preservation Office,**

**and**

**The New York City Housing Authority**

**Regarding**

**The Fulton and Elliott-Chelsea Houses Redevelopment Project**

**New York City, New York**

**NYC HOUSING AUTHORITY**

By: \_\_\_\_\_

Name:

Title:

Date: \_\_\_\_\_

**INVITED SIGNATORY PAGE FOR MEMORANDUM OF AGREEMENT**

**Between**

**The New York City Department of Housing Preservation and Development,**

**The New York State Historic Preservation Office,**

**and**

**The New York City Housing Authority**

**Regarding**

**The Fulton and Elliott-Chelsea Houses Redevelopment Project**

**New York City, New York**

**ELLIOTT FULTON LLC**

By: \_\_\_\_\_

Name:

Title:

Date: \_\_\_\_\_

**CONCURRING PARTY PAGE FOR MEMORANDUM OF AGREEMENT**

**Between**

**The New York City Department of Housing Preservation and Development,**

**The New York State Historic Preservation Office,**

**and**

**The New York City Housing Authority**

**Regarding**

**The Fulton and Elliott-Chelsea Houses Redevelopment Project**

**New York City, New York**

**NEW YORK CITY LANDMARKS PRESERVATION COMMISSION**

By: \_\_\_\_\_

Name:

Title:

Date: \_\_\_\_\_

**CONCURRING PARTY PAGE FOR MEMORANDUM OF AGREEMENT**

**Between**

**The New York City Department of Housing Preservation and Development,**

**The New York State Historic Preservation Office,**

**and**

**The New York City Housing Authority**

**Regarding**

**The Fulton and Elliott-Chelsea Houses Redevelopment Project**

**New York City, New York**

**HISTORIC DISTRICTS COUNCIL**

By: \_\_\_\_\_

Name:

Title:

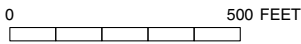
Date: \_\_\_\_\_

## **EXHIBIT A – PROJECT LOCATION**

Data source: Orthoimagery via Nearmap



-  Elliott-Chelsea Houses
-  Fulton Street Houses

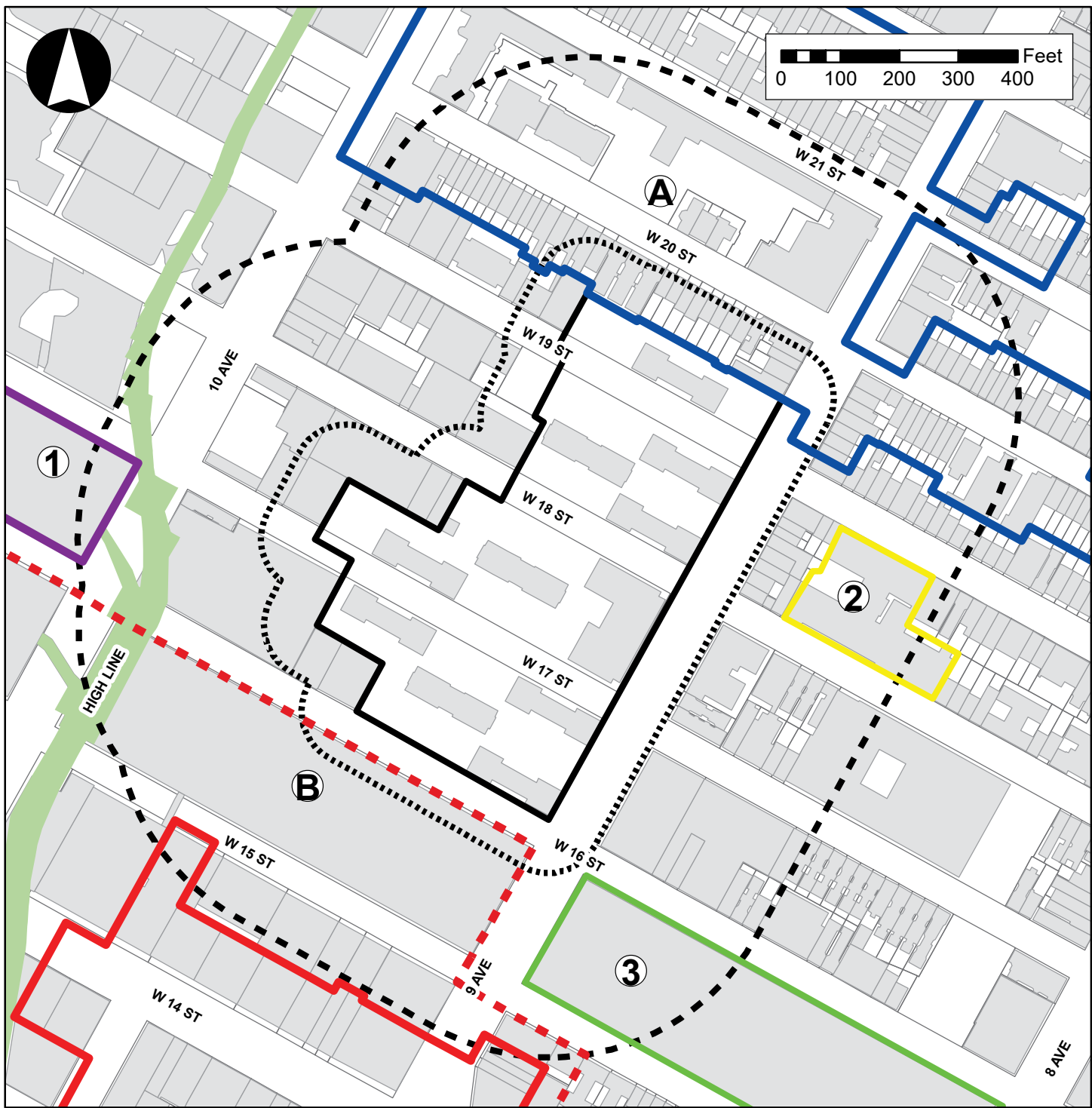


**ELLIOTT-CHELSEA HOUSES**

Project Location



## **EXHIBIT B – AREAS OF POTENTIAL EFFECT**



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

### Legend



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)



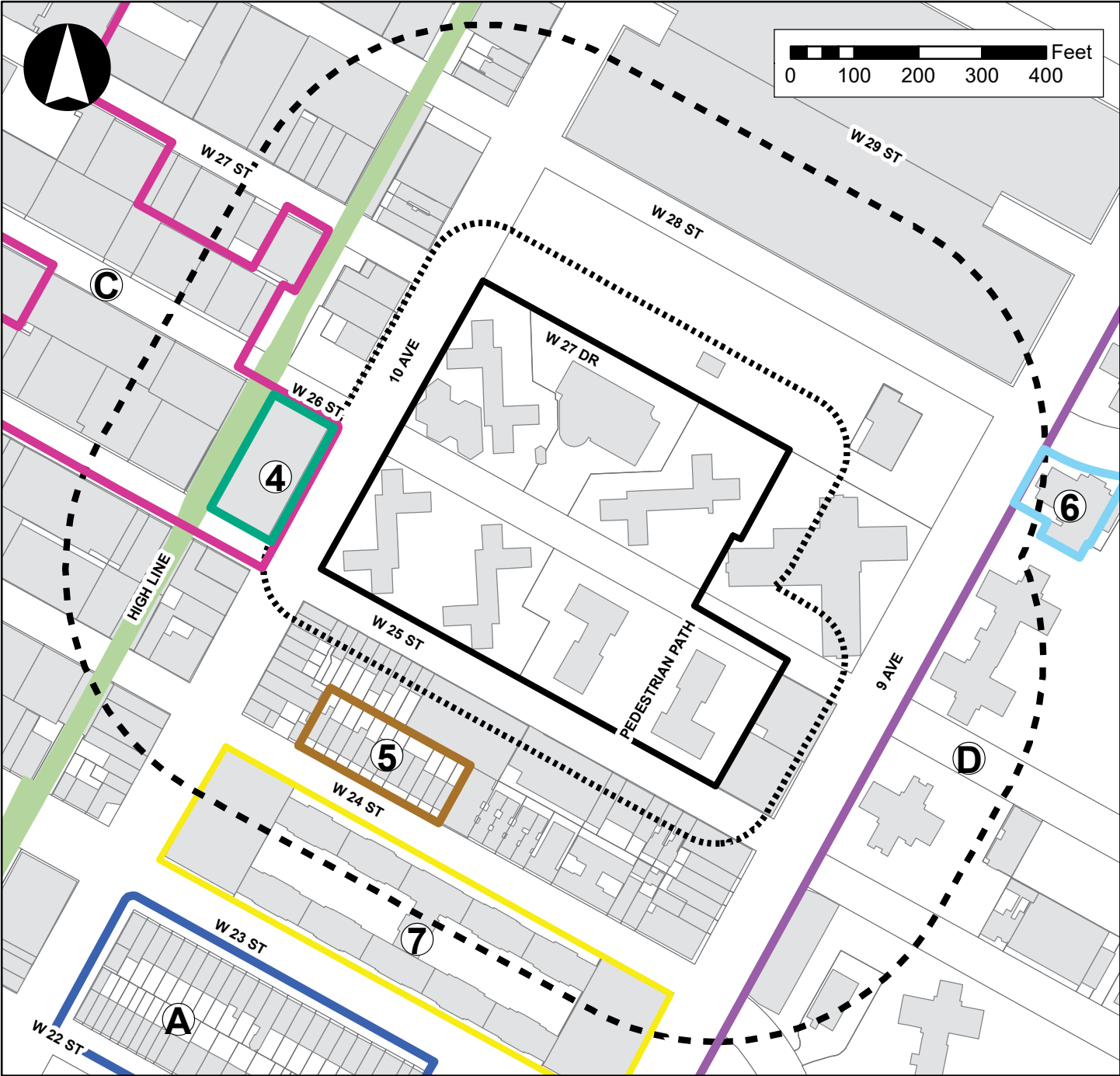
Merchants Refrigerating Company  
Warehouse (S/NR-Listed)



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



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



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)

## EXHIBIT C – HISTORIC PROPERTIES IN THE SECONDARY APES

Map No. <sup>1</sup>	Historic Resource Name	Address / Location	Block / Lot	NHL	S/NR	S/NR-Eligible	NYCL	NYCL-Eligible
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	
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 <sup>th</sup> 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 <sup>rd</sup> Street	721 / 7 & 7501			X		

**Notes:**

<sup>1</sup> Refer to Figures 05.06-1a and 05.06-1b

NHL: National Historic Landmark

S/NR: Listed on the State and National Registers of Historic Places.

S/NR-eligible: Officially determined eligible for listing on the State and National Registers of Historic Places.

NYCL: New York City Landmark

NYCL-eligible: Determined to appear eligible for designation as a NYCL.

**EXHIBIT D – DETERMINATION LETTER FROM THE NEW YORK STATE  
HISTORIC PRESERVATION OFFICE**



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

October 19, 2023

Taylor Goldman  
Senior Environmental Analyst  
NYCHA  
24-02 49<sup>th</sup> Ave  
Long Island City, NYC, NY 11101

Re: HUD  
Fulton Elliott-Chelsea Houses PACT  
23PR06218

Dear Taylor Goldman:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the provided documentation in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include other environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (NY Environmental Conservation Law Article 8).

We note that our office has determined that the Fulton Houses complex is Not Eligible for listing in the State and National Registers of Historic Places; and that the Elliott-Chelsea Houses complex is eligible for listing in the State and National Registers of Historic Places. Please see the Determination of Eligibility attached here. We have reviewed the project description and supporting documentation that was provided to our office on October 12<sup>th</sup>, 2023. Base upon our review, we understand that the proposal entails demolition and redevelopment of both complexes. Demolition of historic resources is by definition an Adverse Effect that requires a study of alternatives that could potentially avoid or minimize the adverse effects. Please initiate the Section 106 consultation process, and at this time we request preparation of an Alternatives Analysis for Elliott-Chelsea Houses.

If you have any questions, I am best reached via e-mail.

Sincerely,

Olivia Brazee  
Historic Site Restoration Coordinator  
olivia.brazee@parks.ny.gov

cc: CRIS list

via e-mail only

## **EXHIBIT E – ALTERNATIVES ANALYSIS FOR SECTION 106 CONSULTATION**

**Fulton and Elliott-Chelsea Houses Redevelopment Project**  
**Fulton Houses and Elliott-Chelsea Houses**  
**Chelsea, Manhattan, NY**

**Alternatives Analysis for Section 106 Consultation**

**September 12, 2024**

**A. INTRODUCTION**

The New York City Housing Authority (NYCHA) proposes the staged replacement and demolition of all existing dwelling unit and community facility spaces across NYCHA's Fulton, Elliott, Chelsea, and Chelsea Addition Houses campuses (collectively, the Project Sites) in the Chelsea neighborhood of Manhattan with a new mixed-use development (the Proposed Project). Fulton Houses occupy portions of blocks bounded by West 20th and West 16th Streets and Tenth and Ninth Avenues. Elliott Houses, Chelsea Houses, and Chelsea Houses Addition (collectively, Elliott-Chelsea Houses) occupy portions of blocks bounded by West 27th Drive, West 25th Street, and Tenth and Ninth Avenues. As part of the Permanent Affordability Commitment Together (PACT) Program, NYCHA intends to submit an application(s) to the United States Department of Housing and Urban Development (HUD) for disposition of public housing property as authorized under Section 18 of the U.S. Housing Act of 1937 as amended and implementing regulations at 24 C.F.R. part 970 (Section 18) and for the conversion of subsidies under Section 9 of the United States Housing Act of 1937 (42 U.S.C. 1437g) to project-based vouchers (PBVs) subsidies under Section 8 of the United States Housing Act of 1937 (U.S.C. 1437f) as authorized by the Rental Assistance Demonstration (RAD) Program created by the Consolidated and Further Continuing Appropriations Act of 2012, as amended. Under the PACT program, NYCHA would enter into 99-year ground leases involving the Project Sites, with Elliott Fulton LLC, a joint venture between Essence Development and The Related Companies and/or affiliates thereof (collectively, the PACT Partner). Under the Proposed Project, the Project Sites would be redeveloped with 2,056 replacement PBV dwelling units, up to 3,454 mixed-income dwelling units, and retail, supermarket, community facility, and medical office space, as described in more detail below. See **Figure 1** for a map showing the location of the Project Sites.

**PROJECT PURPOSE AND NEED**

The Proposed Project aims to improve the quality of life and housing stability for the existing public housing residents of Fulton and Elliott-Chelsea Houses, and it would result in the complete redevelopment of both Fulton and Elliott-Chelsea Houses. The Proposed Project would facilitate construction of new Project-Based Section 8 housing for all existing NYCHA residents (replacing all the existing 2,056 NYCHA housing units), while also preserving permanent affordability and residents' rights under the PACT Program. The purpose of the Proposed Project is also to facilitate the construction of additional affordable and market rate housing units to address the critical shortage of affordable housing and housing in general in New York City and to financially support the PACT portion of the project. The new affordable units would directly address the shortage by increasing New York City's affordable housing stock, while the new market-rate units would address the overall City-wide housing shortage by generally increasing the supply of housing in New York City. The Proposed Project would also facilitate the development of additional



community facility and retail uses and accessory open space for the benefit of NYCHA residents and the surrounding community.

Implementing the Proposed Project requires the preparation of an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA), as amended. Because the Proposed Project requires local and state approvals in addition to federal approvals, the EIS will satisfy the State Environmental Quality Review Act (SEQRA) and City Environmental Quality Review (CEQR) regulations in addition to NEPA. The Proposed Project is also subject to review under Section 106 of the National Historic Preservation Act (NHPA).

The following three development alternatives of the Proposed Project have been identified and are being analyzed in the Draft EIS (DEIS):

- **Rezoning Alternative:** The Rezoning Alternative would be composed of 2,056 Section 8 PBV units (to replace the existing 2,056 Section 9 NYCHA units), 1,038 new permanently affordable units, and 2,416 market rate-units.<sup>1</sup> It would also include 28,784 square feet (sf) of local retail, 17,580 sf of supermarket use, and the replacement of the existing 56,859 sf of community facility and neighborhood center space currently operated by Hudson Guild as well as an additional 87,223 sf of community facility neighborhood center use, replacement of the existing 10,300 sf of daycare use, as well as an additional 7,685 sf of daycare use, and 13,785 sf of medical office use.<sup>2</sup>
- **Non-Rezoning Alternative:** The Non-Rezoning Alternative would be composed of 2,056 Section 8 PBV units (to replace the existing 2,056 Section 9 NYCHA units), 536 permanently affordable units, and 1,247 market-rate units.<sup>3</sup> This alternative would also include 21,675 sf of local retail, 7,400 sf of supermarket, the replacement of the existing 56,859 sf of community facility and neighborhood center space currently occupied by Hudson Guild, as well as an additional 118,148 sf of community facility neighborhood center use, replacement of the existing 10,300 sf of day care use, as well as an additional 2,355 sf of daycare use, and 12,046 sf of medical office related uses.<sup>4</sup>
- **Fulton Mid-Block Density Alternative:** Under the Fulton Mid-Block Density Alternative, development of the Elliott-Chelsea Houses Project Site would be the same as under the Rezoning Alternative. On the Fulton Houses Project Site, this alternative would provide the same uses and development program as the Rezoning Alternative, but the tallest proposed

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<sup>1</sup> Of the units to be developed under the Rezoning Alternative, at Fulton Houses there would be 537 new permanently affordable units and 1,251 market-rate units and at Elliott-Chelsea Houses there would be 501 new permanently affordable units and 1,165 market-rate units.

<sup>2</sup> Of the local retail use, 16,724 sf would be on the Fulton Houses site and 12,060 sf would be on the Elliott-Chelsea Houses site. Of the supermarket use, 6,580 sf would be on the Fulton Houses site and 11,000 sf would be on the Elliott-Chelsea Houses site. Of the day care use, 9,770 sf would be on the Fulton Houses site and 8,215 sf would be on the Elliott-Chelsea Houses site. Of the medical office related uses, 2,500 sf would be on the Fulton Houses site and 11,285 sf would be on the Elliott-Chelsea Houses site.

<sup>3</sup> Of the units to be developed under the Non-Rezoning Alternative, at Fulton Houses there would be 289 new permanently affordable units and 671 market-rate units and at Elliott-Chelsea Houses there would be 247 new permanently affordable units and 576 market-rate units.

<sup>4</sup> The local retail and supermarket uses would be located on the Fulton Houses site. Of the day care use, 3,206 sf would be on the Fulton Houses site and 9,449 sf would be on the Elliott-Chelsea Houses site. Of the medical office related uses, 2,500 sf would be on the Fulton Houses site and 9,546 sf would be on the Elliott-Chelsea Houses site.

buildings would be located in the middle of the site and the shorter proposed buildings would be along Ninth Avenue.

Additionally, a potential fourth alternative is discussed in the DEIS in response to public comments on the Draft Scope of Work (DSOW) issued for public comment in January 2024. This alternative, the Rehabilitation and Infill Alternative, would propose the demolition of the existing Hudson Guild Elliott Center space located between West 26th Street and West 27th Drive and replace it with the new construction of 110 housing units. This alternative is not under consideration as the Preferred Alternative as NYCHA and the PACT Partner have concluded that it would be economically and logistically infeasible and would not meet the purpose and need of the Proposed Project.

## **NATIONAL REGISTER EVALUATION AND DETERMINATION OF EFFECT**

On October 18, 2023, the New York State Historic Preservation Office (SHPO) determined that Fulton Houses are not eligible for listing on the State and National Registers of Historic Places (S/NR). In the same evaluation, SHPO determined that Elliott-Chelsea Houses are eligible for S/NR listing under Criterion A in the areas of Social History and Politics/Government and under Criterion C for the site plan and architectural design, as discussed more fully in SHPO's Resource Evaluation included in **Attachment A**. The Resource Evaluation also noted Elliott Houses for being one of the first publicly funded housing projects in New York City composed exclusively of high-rise buildings, the Children's Center for its Mid-Century Modern Design, and Chelsea Houses Addition as an excellent example of Brutalist architecture. As NYCHA and the PACT Partner propose to demolish Elliott-Chelsea Houses and develop new mixed-use buildings on the site, the Proposed Project would have an Adverse Effect pursuant to Section 106 of the NHPA, requiring the exploration of alternatives to the demolition of Elliott-Chelsea Houses. As Fulton Houses are not eligible for S/NR listing, the redevelopment of Fulton Houses would not constitute an Adverse Effect pursuant to Section 106, and this Alternatives Analysis does not evaluate alternatives to their proposed redevelopment.

## **PRINCIPAL CONCLUSIONS**

This Alternatives Analysis provides information regarding the current status and history of Elliott-Chelsea Houses as it affects the potential for preservation and presents an analysis of alternatives to demolition that have been considered. As presented below, NYCHA and the PACT Partner have explored all prudent and feasible alternatives to the demolition of Elliott-Chelsea Houses to avoid the Adverse Effect and have determined that full or partial preservation of Elliott-Chelsea Houses is not feasible and does not meet the identified purpose and need of the Proposed Project.

## **B. HISTORY**

### **ORIGINAL CONSTRUCTION AND USE**

In 1942 during the Second World War, Mayor Fiorello LaGuardia proposed a \$680,000,000 program of post-war public works projects that included public housing to be financed by state loans and state and city subsidies. In 1942–1943, NYCHA began acquiring land and selecting architects to prepare plans for ten proposed low-income public housing projects in Manhattan, Brooklyn, and the Bronx. NYCHA intended for construction of those housing projects to occur in the three years following the war's end. Elliott Houses, which were to occupy parts of the two blocks bounded West 27th Drive and West 25th Street and Ninth and Tenth Avenues in the Chelsea neighborhood of Manhattan, was one of the ten initial NYCHA low-income housing

projects planned for construction after the war, and it was to be financed solely by the City of New York.

When the City acquired the six-acre site for Elliott Houses, it contained numerous four- and five-story dwellings, a Con Ed substation, a large brewery for the Flanagan-Nay Brewing Company, and the Hudson Guild Neighborhood House. Social worker John Lovejoy Elliott, for whom the Elliott Houses are named, founded the Hudson Guild in 1895 as a settlement house to serve the needs of Chelsea residents. The six-story Neighborhood House was built on West 27th Street in 1908-09. In the 1930s, the brewery, which included cold storage and bottling plants, was the Phoenix Cereal Beverage Company, a bootlegging operation that may have been associated with the notorious gangster Owney Madden. By 1942, the City had cleared the site except for the Hudson Guild Neighborhood House, which was to remain within the footprint of the Elliott Houses and to continue providing its services, and then leased the site to the United States Coast Guard for the erection of temporary barracks to house around 1,000 men for the duration of the war.

Construction of Elliott Houses was estimated to cost around \$3,970,000, including purchase of the site, and ground-breaking occurred in December 1945. Archibald Manning Brown, William Lescaze, and Morris & O'Connor were the architects, and the project consisted of two 12-story buildings and two 11-story buildings, containing a total of 608 units of one to three bedrooms and occupying approximately 20 percent of the site, with the rest of the site landscaped and designed with sitting areas, a playground, and paths (see **Figure 2** for a 1947 site plan). Some portions of the open spaces adjacent to Buildings 2 and 3 on West 25th Street were sunken below sidewalk level. Elliott Houses also contained a central heating plant, laundry rooms with coin-operated machines, and a day-care nursery on the ground floor of Building 1 (on Tenth Avenue between West 27th and West 26th Street), which was to be run by the Hudson Guild. Elliott Houses did not contain any retail space. As part of the project, West 27th Street was eliminated from the City Map and replaced by a narrow service road that did not extend to Ninth Avenue and instead looped around the site to connect with West 26th Street. This service road is known as West 27th Drive. Completed in 1947, Elliott Houses was NYCHA's first housing project completed after the Second World War. The first sixteen families, which were all families of veterans, moved into the first completed building in January 1947.

The architects designed the brick, steel, and concrete buildings with pinwheel footprints set within open spaces, and each building consisted of a north unit and a south unit, with each unit having a separate elevator and stair core. On the eighth floor of each building, there was a cross-over hallway lined with apartments that connected the two units. The long-sides of the buildings were 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.

Between 1962-64, NYCHA constructed the two buildings of Chelsea Houses on a site between West 26th and West 25th Streets adjacent to Elliott Houses. That site contained four- and five-story dwellings, a parking garage, and warehouses. Paul L. Wood & Associates were the architects of the brick, concrete, and steel buildings. Each building was a 21-story slab structure with an L-shaped footprint (see **Figure 3**). Together, they contained 425 apartments, 61 of which were set aside for seniors. A landscaped play area was located between the buildings, and a paved parking and storage area was located on the east side of the easternmost building. Development of Chelsea Houses also included construction of the one-story Children's Center at the corner of Tenth Avenue and West 26th Street within the Elliott Houses site. The Children's Center was attached to Elliott Houses Building 1 and was an extension of the day-care nursery that was provided in

that building as part of the original plan. Replacing a landscaped sitting area, the Children's Center had a footprint composed of six hexagonal playrooms located along a corridor that branched toward Tenth Avenue from a lobby that connected internally with Elliott Houses Building 1.

In 1968, Chelsea Houses Addition replaced the Hudson Guild Neighborhood House on West 27th Drive. Designed by Edelbaum & Webster Architects, Chelsea Houses Addition consisted of a 14-story concrete and brick tower set on a two-story base with a two-story concrete and brick extension (see **Figure 4**). Above the base, the tower had a cross-shaped footprint, and it contained 96 one-bedroom units for seniors. The two-story base and extension contained a community center, which is named for John Lovejoy Elliott, with offices, gallery, meeting room, a theater on the first floor, a below-grade basketball court, and an open courtyard. Development of the Chelsea Houses Addition also involved redesign of the adjacent open spaces and paths.

## **RECENT HISTORY AND NEED FOR REDEVELOPMENT**

After decades of continual use for public housing (77 years for Elliott Houses and approximately 60 years for Chelsea Houses and Addition), the buildings and units of Elliott-Chelsea Houses have become deteriorated and substandard. In October 2019, stakeholders including residents, elected officials, Manhattan Community Board 4, the Mayor's Office, housing and legal advocates, and NYCHA formed the Chelsea NYCHA Working Group (the Working Group) to research, evaluate, and make recommendations to systematically and effectively address the capital needs of Fulton, Elliott, Chelsea, and Chelsea Addition Houses. The Working Group participated in an extensive public engagement process from 2019 to 2021 that included consultations with NYCHA residents, elected officials, community representatives, and housing organizations and advocates. Among other strategies to raise revenue for repairs, recommendations included that the Fulton, Elliott, Chelsea, and Chelsea Addition Houses be included in PACT and that appropriate locations and design guidelines for new mixed-use development on site be identified.

After the Working Group published its recommendations in February 2021,<sup>5</sup> NYCHA, with support from Citizens Housing and Planning Council (CHPC), continued working with resident leadership at both Fulton and Elliott-Chelsea to design the Request for Proposal (RFP) and select a PACT Partner team. The Working Group had concluded its process by this time. The capital needs identified in the Working Group's recommendations and in NYCHA's 2017 Physical Needs Assessment informed the PACT Partner's RFP submission. As the PACT Partner team, led by Essence Development and Related Companies, began conducting their investigations of buildings at each development, the conditions that prompted the creation of the Working Group and the subsequent issuance of the RFP were better understood and were far worse than initially anticipated. In 2022, the PACT Partner completed a comprehensive, five-month pre-design due diligence process that revealed significant capital repair needs (for plumbing and electrical systems and environmental conditions) 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 addition, residents began to express frustration that the new residential building to be constructed at Elliott-Chelsea, which was part of the PACT partner's original RFP response, would not be dedicated to current Fulton and Elliott-Chelsea residents.

In response to these concerns, and in coordination with resident leaders and NYCHA, the PACT Partner proposed several approaches to address the needs of the buildings and the community.

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<sup>5</sup> More information about the Chelsea NYCHA Working Group February 2021 findings can be found in the Chelsea NYCHA Working Group Final Report here: <https://www.nyc.gov/assets/nycha/downloads/pdf/Chelsea-NYCHA-WG-Report-Final.pdf>.

These options included one rehabilitation plan (inclusive of one new residential building at Elliott-Chelsea, as originally proposed in response to the RFP) and two comprehensive rebuilding plans. NYCHA and the PACT Partner surveyed residents of Fulton and Elliott-Chelsea Houses to understand whether they preferred to move forward with the rehabilitation of the existing buildings, as originally planned, or proceed with a new proposal that would replace all existing buildings through new construction. The survey followed a community outreach and engagement process that included town halls, small group meetings, virtual meetings and tours of newly constructed affordable housing developments in other neighborhoods. NYCHA and the PACT Partner surveyed residents of Fulton and Elliott-Chelsea Houses to understand whether they preferred to move forward with the rehabilitation of the existing buildings as originally planned or proceed with a new proposal that would replace all existing buildings through new construction. Residents 18 years of age and older on leases could indicate their preference using either an online or paper survey. To support the integrity of the process, CHPC served as an independent third party that reviewed and tabulated the survey results. CHPC received all online and paper surveys, verified resident eligibility, performed QA functions, and summarized the results. Based on CHPC's analysis, 969 residents, representing approximately 29 percent of the total eligible population across both campuses, participated in the survey. Approximately 37 percent of all households had at least one individual who submitted a survey response. Of those residents who submitted a response, 57 percent indicated a preference for new construction/full replacement of existing units. The results of this survey informed the purpose and need for the Proposed Project, which includes new project-based Section 8 housing for all existing NYCHA residents as well as new permanently affordable housing and new market rate housing.

Subsequently, NYCHA and the PACT Partner, in consultation with leadership from the Fulton and Elliott Chelsea Tenants Associations, proposed the full redevelopment of Fulton and Elliott-Chelsea Houses with 2,056 Project-Based Section 8 residential units for existing NYCHA residents (944 units on the Fulton Houses site and 1,112 units on the Elliott-Chelsea Houses site), an additional 3,454 mixed-income units under the Rezoning Alternative (1,788 units on the Fulton Houses Site and 1,666 units on the Elliott-Chelsea Houses site) of which 1,038 units would be permanently affordable housing under the Mandatory Inclusionary Housing (MIH) program (537 units on the Fulton Houses Site and 501 units on the Elliott-Chelsea Houses site) and the remaining 2,416 units would be market-rate units (1,251 units on the Fulton Houses site and 1,165 units on the Elliott-Chelsea Houses site).<sup>6</sup> Under the Rezoning Alternative, there would also be 28,784 sf of local retail (16,724 sf on the Fulton Houses site and 12,060 sf on the Elliott-Chelsea Houses site), 17,580 sf of supermarket use (6,580 sf on the Fulton Houses site and 11,000 sf on the Elliott-Chelsea Houses site), and the replacement of the existing 56,859 sf of community facility and neighborhood center space currently operated by Hudson Guild as well as an additional 87,223 sf of community facility neighborhood center use, replacement of the existing 10,300 sf of daycare use, as well as an additional 7,685 sf of daycare use, and 13,785 sf of medical office use.<sup>7</sup>

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<sup>6</sup> As noted above, the Non-Rezoning Alternative also would provide 2,056 Project-Based Section 8 residential units for existing NYCHA residents, along with an additional 1,783 mixed-income units (960 units on the Fulton Houses site and 823 on the Elliott-Chelsea Houses site) of which 536 would be permanently affordable (289 units on the Fulton Houses site and 247 on the Elliott-Chelsea Houses site) and the remaining 1,247 units would be market rate (671 units on the Fulton Houses site and 576 units on the Elliott-Chelsea Houses site).

<sup>7</sup> As noted above, the Non-Rezoning Alternative would also include 21,675 sf of local retail on the Fulton Houses site, 7,400 sf of supermarket use on the Fulton Houses site, the replacement of the existing 56,859 sf of community facility and neighborhood center space currently operated by Hudson Guild as well as an

## C. EXISTING CONDITIONS

The existing conditions of Elliott-Chelsea Houses are described below. See **Figure 5** for an existing site plan and **Figures 6 through 24** for photographs of Elliott-Chelsea Houses.

### ELLIOTT HOUSES

Elliott Houses consists of two 11-story brick-clad buildings with concrete bases (Buildings 2 and 3) on the block between West 25th and West 26th Street and two 12-story brick-clad buildings with concrete bases (Buildings 1 and 4) on the block between West 26th Street and West 27th Drive. The buildings have pinwheel footprints composed of north and south units (each with an L-shaped plan) joined by a long, offset rectangular connector segment. Each unit has an elevator and stair core, and the units are joined internally on the eighth floor by a cross-over hallway through the connector segment. The buildings are largely set back from the street behind open spaces. Each building has multiple entrances with primary and secondary entrances, and they are all located off the adjacent streets within the angles formed where the L-shaped units join the connector segments. Building entrances are elevated and accessed by stairs or by a combination of stairs and ramps. The building façades are flat, largely unornamented brick surfaces punched with regularly arranged window openings of three sizes containing double-hung windows. On the back side of each L-shaped unit, the corner where the unit joins the connector segment is faced in stucco at each window level. The recessed exteriors of the stair halls are clad in glass and porcelain panels. Building roofs are flat, and metal railings are located on the parapets. Each elevator and stair core has a brick bulkhead. Basement areaways covered by shallow, corrugated metal canopies are located adjacent to portions of the buildings' façades, and metal fences on concrete retaining walls enclose these areaways. The lobby interiors of Elliott Houses have glazed brick walls, tiled floors, and concrete ceilings. Apartments have brick walls parged in plaster, concrete ceilings, concrete floors with vinyl tiles, and wood cabinetry. The ceiling fixtures in the apartments and common areas use fluorescent lighting.

The open spaces of Elliott Houses occupy most of the site and consist of planted areas, masonry sitting areas, playgrounds with rubber mat surfaces, and concrete paths. All of these distinct spaces have irregular footprints, and the concrete paths cross the site at multiple angles. Most of the sitting areas are concrete, but there are also brick sitting areas. Metal fences on concrete curbs enclose the site perimeter and the interior planted areas and playgrounds. Two bench types—all metal or metal frame with wood-slat seating—are located throughout the site, which also contains some wood picnic tables and some concrete and metal tables. The playgrounds contain modern metal playground equipment. The playground adjacent to Building 1 contains a small kiosk with a sloped roof and glazed brick façades.

See **Figures 6 through 13** for photographs of Elliott Houses.

### CHILDREN'S CENTER

The one-story Children's Center is connected to Elliott Houses Building 1 and located at the corner of West 26th Street and Tenth Avenue. Designed in a Mid-Century Modern style, the three façades are composed of faceted, recessed and projecting bays that reflect the floorplan of six hexagonal

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additional 118,148 sf of community facility neighborhood center use (57,367 sf on the Fulton Houses site and 117,640 sf on the Elliott-Chelsea Houses site), replacement of the existing 10,300 sf of daycare use as well as an additional 2,355 sf of daycare use (3,206 sf on the Fulton Houses site and 9,449 sf on the Elliott-Chelsea Houses site), and 12,046 sf of medical office use (2,500 sf on the Fulton Houses site and 9,546 sf on the Elliott-Chelsea Houses site).

playrooms located along a corridor. The Children's Center has a parabolic concrete roof with metal flashing and asphalt roof tiles. The façades are clad in glazed brick of contrasting colors that create the appearance of piers framing large windows and flat wall surfaces. The building entrance is set back from West 26th Street where the Children's Center adjoins Building 1. On West 26th Street, there is an attached sign that reads "Children's Center" with colorful letters set within attached hexagons. The interiors have painted concrete walls and ceilings and concrete floors surfaced in vinyl tiles. See **Figures 14 and 15** for photographs of the Children's Center.

## **CHELSEA HOUSES**

Chelsea Houses consist of two 21-story brick-clad slab buildings. Set back from the street, they have approximately L-shaped footprints with recessed vertical sections in the middle of the long sides. The building façades are flat, unornamented brick surfaces punched with regularly spaced window openings of two sizes containing double-hung windows. Roofs are flat with metal railings on the parapets. Building 2 has an entrance on West 25th Street and Building 1 has an entrance on West 26th Street, and both have entrances from the open space located between them. Building entrances are raised above the street and accessed by stairs and ramps, and they have concrete awnings and wall sections clad in colorful glazed brick. At the northwest corner of Building 2 on the ground floor, there is a mosaic (installed circa early 2000s) depicting adults and children and baseball and basketball players. Basement areaways enclosed by metal fences on concrete curbs are located adjacent to sections of the side façades. The residential lobby interiors of Chelsea Houses have glazed brick walls, terrazzo floors, and concrete ceilings. The residential hallways have glazed brick walls, concrete ceilings, and concrete floors with vinyl tiles, and the apartments have brick walls parged in plaster, concrete ceilings, concrete floors with vinyl tiles, and wood cabinetry. The ceiling fixtures in the apartments and common areas use fluorescent lighting.

The open space between the buildings contains playgrounds on West 26th and West 25th Streets, planted areas, and concrete paths. Metal fences on concrete curbs enclose the planted areas and playgrounds. The playgrounds have rubber mat surfaces and modern metal playground equipment, but the north playground also has a fountain play area with two concrete animal sculptures. Metal benches are located within the open space, and there are picnic tables at the southeast corner. A narrow, paved parking and service area is located on the east side of Building 2. A one-story garage is located within this paved area toward West 26th Street, and it has vehicular openings on its north and south sides.

See **Figures 16 through 20** for photographs of Chelsea Houses.

## **CHELSEA HOUSES ADDITION**

Chelsea Houses Addition is located on West 27th Drive between Elliott Houses Buildings 1 and 4. 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. The cross-shaped footprint of the tower above the base creates wide north, east, south, and west façades and three-sided recessed, canted corners. The north, east, south, and west façades 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 roof of the tower is flat, and there is a metal railing on the parapet.

On West 27th Drive, the two-story base of the tower is composed of four recessed bays framed by the outer brick walls and inner concrete piers. Those bays contain windows and a raised entrance accessed by stairs and a ramp. On West 27th Drive, the entrance façade of the extension is metal

and glass, while the remainder of the extension's street façade is articulated with recessed brick bays framed by concrete piers supporting a concrete cornice. The recessed brick bays contain slit windows at the first floor and large windows on the second floor. The west brick façade of the extension, which faces Elliott Houses Building 1, has two sections—one set perpendicular to West 27th Drive and an angled section that turns into a rounded corner to transition back to the base of the tower. The perpendicular section contains concrete-framed second-floor windows, while the angled and curved section is mostly unfenestrated as an auditorium is located in that part of the building. The curved façade does have applied lighting and signage for the Hudson Guild. A concrete joint between the two brick sections of the extension contains an entrance. The south façade of the two-story base is designed with a concrete frame containing metal and glass window walls with louvered sections. The primary entrance into the community center is at this façade. An angled concrete path from West 26th Street leads to the awninged entrance that faces a raised, slate patio, which contains picnic benches and globe streetlights. A metal fence encloses the patio. The finishes of the community center's ground floor interiors are concrete walls, concrete floors with vinyl tiles, wood flooring in a gallery, and acoustical dropped ceilings. The auditorium has concrete walls, a small stage, and raked seating. There is an open, metal staircase between floors in the lobby. See **Figures 20 through 24** for photographs of Chelsea Houses Addition.

## ALTERATIONS

A number of alterations have been made to Elliott-Chelsea Houses, which include:

- In the 1980s, all of the original casement windows in Elliott Houses were replaced with double-hung windows. At the same time, portions of the fixed windows of all the stair halls were replaced with porcelain panels.
- Apartment buildings in Elliott Houses have been periodically modernized with new appliances and cabinetry.
- The original open space plan of Elliott Houses has been notably altered through the addition of the Children's Center that replaced a sitting area and the addition of Chelsea Houses Addition that replaced the early 20th-century Hudson Guild building, which had intentionally been incorporated into the Elliott Houses plan, along with portions of two designated sitting areas on West 27th Drive adjacent to Elliott Houses Buildings 1 and 4. Other landscape changes include redesigning a sitting area on West 27th Drive adjacent to Building 1 into a planted area, replacing benches, and replacing the original metal and concrete play equipment with modern playground equipment.
- The original play equipment of Chelsea Houses—which consisted of arched, metal step climbers, metal pipe-frame exercise units, concrete turtles, concrete and metal tunnel slides, and concrete saddles—have been replaced with modern playground equipment.
- In 2004, the two-story south façade of the community center in Chelsea Houses Addition was redesigned. The original design of a grid of concrete frames containing windows, a recessed entrance, and a large, two-story open void that contained an open court were infilled with metal and glass window walls. The windows and entrance were made flush with the framing concrete members, and the open court was turned into an indoor classroom. The community center entrance on West 27th Drive was also redesigned with a similar metal and glass window wall treatment.
- The 2004 renovation of the community center in Chelsea Houses Addition also included modernizing the interior finishes and reconstructing the open space in front of the entrance as a raised, slate patio with picnic benches. That area had included a playground with concrete and metal play equipment.



## BUILDING CONDITIONS

As noted above, the buildings and units of Elliott-Chelsea Houses have become deteriorated and substandard. Substantial repair and rehabilitation, which would create considerable inconvenience to the residents, would be required to address persistent building issues that include deteriorated brick facades, mold and leaks, the presence of lead-based paint, outdated elevators, outdated heating, ventilation, mechanical and electrical systems, old fixtures and appliances, and other issues that negatively affect the quality of life of the residents. More detail on some of these deteriorated and substandard conditions are provided below:

- *Brick Façades:* The mortar in the brick facades shows signs of deterioration, leading to potential water penetration issues. Numerous buildings are in need of masonry pinning and significant brick replacement to ensure structural integrity and safety. Routinely maintaining mortar joints in older masonry buildings is especially important because they typically lack air gaps, weeps, and vents. Without these features, moisture can potentially migrate through the masonry wall through to the interior apartment. This moisture penetration creates the possibility for developing mold and mildew, which creates health concerns. During colder weather, moisture that enters or condensates can freeze in a wall assembly and break down building materials if there is no way for the water to escape.
- *Heating and Hot Water:* The electrical, steam, and water systems are interconnected for Elliott-Chelsea Houses, meaning if one building goes down, the others follow, creating widespread outages and making repairs difficult. The heating/hot water outages will continue to worsen over time if left unaddressed. The boiler plant in Elliott Houses Building 4 services steam to Elliott Houses Buildings 1, 2, and 3, and to the Chelsea Houses Addition. Elliott Houses Building 4 also services water to Elliott Houses Buildings 1, 2, and 3. Chelsea Houses Building 1 services gas, water, steam, and electricity to Chelsea Houses Building 2. The distribution of steam between buildings is hindered by aging steam traps, which are no longer able to successfully prevent the release of steam, resulting in energy inefficiency. Additionally, the heating elements within the apartments lack temperature controls. As a result, buildings in closer proximity to the boiler are often overheated, leading residents to open windows or use air conditioning to mitigate the excessive heat, while buildings further away from the boiler experience subpar heating.
- *Waste and Drain Pipes:* The 2022 pre-design due diligence process included an engineering assessment commissioned by the PACT Partner of the cast iron waste and drain pipes in Elliott-Chelsea Houses. The engineering assessment revealed that the piping system dates to the original constructions of the buildings and that sampled pipe segments from all Elliott Houses, Chelsea Houses, and Chelsea Houses Addition exhibited graphitic corrosion on the interior pipe surfaces from long-term exposure to water. This corrosion has reduced the life expectancy of some of the waste/drain pipe segments to 0 years and 6 to 15 years at other segments. Some of the pipe segments still have life expectancies of 50+ years. The deteriorated waste lines located behind the walls of the kitchen and bathrooms have led to persistent leaks on multiple floors, causing significant water damage and mold growth. The pipe repair process necessitates an examination of multiple units in vertical lines, and if asbestos, mold, or lead-based paint is present, it must first be removed before the pipes can be replaced. Then the carpentry team repairs the walls, painting, and plaster, and the finishing crew installs shower enclosures/trim to complete the repair. Repairing these pipes has created construction noise and dust and requires residents to temporarily relocate due to the disruptions. Any improvements or replacements to damaged pipes would be performed one apartment at a time and would still leave the plumbing system open to future failures.

- *Leaks and Mold:* Leaks and mold, a particularly critical item for the wellbeing of residents, is a long-term substandard condition of Elliott-Chelsea Houses. The 2022 pre-design due diligence process included a survey of existing mechanical, electrical, and plumbing (MEP) conditions, commissioned by the PACT Partner. The MEP survey observed that the mixture of cast iron and galvanized steel branch piping for the bathroom groups in Elliott Houses was generally in poor condition, and multiple instances of past leaks were observed. Deteriorated waste lines and inadequate bathroom ventilation have resulted in repeated instances of leaks and mold growth throughout Elliott-Chelsea Houses. During quality-of-life surveys by the PACT Partner, it was discovered that mold on walls and ceilings is a pervasive issue, which poses health risks. Additional mechanical systems to deliver improved air circulation (kitchen and bathroom exhaust) are challenging to retrofit due to the spatial requirements for ducts and risers that the current building layout cannot accommodate. Further, distance requirements between exhaust systems and operable windows limit the ability to integrate vertical or horizontal exhaust systems.
- *Electrical System:* The electrical services rooms in Elliott Houses contain the original 1940s equipment. The existing switchgear presents dangerous conditions from exposed busbar, and the electrical panels and conduits are not up to code and in poor condition from water exposure and rusting. Further, the equipment rooms do not comply with certain provisions of the National Electrical Code (NEC): dedicated electrical space above the panels is not maintained and has foreign services running through the room at these locations; doors entering the electrical room have incorrect swing direction; and there are some conditions where the electrical rooms do not maintain required double clearance. Within apartments, electrical panel boxes sometimes contain original conduit, water pipe leakage has rusted panel boxes, and the location of panel boxes in kitchens above the stove or sink has led to grease and rust damage, presents a fire hazard, and is not compliant with the 2011 New York City Electrical Code. Additional non-compliances with the 2011 New York City Electrical Code include the limited number of circuits serving fixed appliances and the placement of outlets. Further, apartment kitchens do not have enough outlets, leading to residents using extension cords. The electrical wiring at Elliott-Chelsea Houses contains original cloth and knob and tube wiring, which poses fire hazards. The cloth wrapping may also contain asbestos, which can be released as it degrades over time. These outdated wiring systems are unable to handle the current electrical demands. This, compounded with New York City's move towards electrification, as well as rapid evolution of appliance technology and increased load demands, raises concern for the ability of buildings to stay up to date. As tenants retrofit their homes with new technology, appliances, and accessories, the susceptibility to electrical overloads increases chances for wiring to melt, spark, and create fires. The building's electrical infrastructure also remains archaic and limits future improvements that would be dependent on more robust electrical loads, such as elevator modernization and additional security wiring. The existing wiring is located within walls and shafts, making it difficult to replace without causing significant disruption. Upgrading the wiring will result in construction noise and dust, could release asbestos and lead, and will require disruptive tenant relocation. Due to the proximity of Elliott-Chelsea Houses to the floodplain, the desire to add modern resiliency measures to the site also poses challenges. Adding emergency outlets to each unit and adding a backup generator in the event of the 100- or 500-year flood would add increased load requirements and redundancy that the current electrical system could not endure. Further, current critical infrastructure in some buildings is located within the floodplain.
- *Fire Protection:* There are no existing fire alarm systems in Elliott or Chelsea Houses. The 2022 MEP survey commissioned by the PACT Partner included in the pre-design due diligence process determined that the only buildings areas to have automatic fire sprinklers

were the trash compactor rooms. Fire suppression is provided through a standpipe system. Chelsea Houses Addition is partially sprinklered in the community center. The tower portion of Chelsea Houses Addition has a standpipe system. While it is typical for older buildings to lack sprinkler coverage, it is important to note that the current fire protection system does not meet current code requirements and cannot be retroactively upgraded.

- *Elevators:* As originally constructed, the buildings of Elliott Houses only have a single elevator in each elevator and stair core, and there are no backup generators. The original elevators in the buildings are equipped with outdated plug-in controller relays, carbon motor brushes, carbon relays, and generators that are no longer current. The sourcing of these outdated parts is time-consuming and leads to extended periods of downtime, as the parts usually must be procured through specially sourced orders and fabricated upon request. Additionally, the elevators do not meet accessibility codes to accommodate an ambulance stretcher. Due to the inability to structurally alter the concrete walls around the elevator core, the size of the elevator car cannot be expanded to meet accessibility requirements. Elevator outages are especially difficult for tenants at higher floors who may require medical services, etc., or who have mobility issues.

### **NYCHA'S PHYSICAL NEEDS ASSESSMENT (PNA)**

NYCHA's Physical Needs Assessment (PNA) effectively evaluates capital investment needs, as well as planning and prioritizing capital investments, across NYCHA's properties. Conducted approximately every 5 years as recommended by HUD, 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. The PNA also identifies physical needs that should ideally be addressed in the short term, including immediately, within the next year, and within the next five years.

The most recent PNA was performed in 2023, and it estimates a 20-year physical need of \$78.3 billion across the 264 public housing properties (comprising 161,400 apartments) that NYCHA currently directly manages. Approximately \$42.1 billion (or 54 percent) of the total need identified relates to assets requiring replacement immediately or within the next year, and \$60.3 billion (or 77 percent) of the total need identified relates to assets requiring replacement within the next five years. Broken down by a per-apartment physical need, 98,928 apartments (or 61 percent) have less than \$500,000 per-apartment physical need, while 62,472 apartments (or 39 percent) have more than \$500,000 per-apartment physical need. The average per-apartment physical needs estimate across properties is approximately \$485,000.<sup>8</sup>

The 2023 PNA Program physically inspected 30 NYCHA-managed developments and identified a number of common issues at these 30 developments. The 2023 PNA Program found the greatest physical need identified according to both cost and deficiency are within apartments, and the most frequent and costly apartment-related needs are bathrooms, floors, and kitchens. Data captured through inspection of the 30 selected developments was analyzed and used as the basis for the development of updated deterioration curves for all asset types/classes using rates of decay from prior inspections.<sup>9</sup> These updated deterioration curves were then used to incrementally age all assets across NYCHA's portfolio from its 2017 condition to its anticipated condition in 2023.

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<sup>8</sup> <https://www.nyc.gov/site/nycha/about/physical-needs-assessment-faqs.page>

<sup>9</sup> Deterioration curves were developed to simulate and estimate the condition of assets aged over time, and the PNA deterioration curve model defines anticipated needs for the entire NYCHA portfolio by considering current needs and other technical data points and applying deterioration curve math to predict

Through this analysis, the needs of Chelsea Houses, Chelsea Houses Addition, and Elliott Houses and associated costs are summarized as follows:

<b>Buildings Within Elliott-Chelsea Project Site</b>	<b>2017 Projected Costs of 20-Year Needs from 2017 PNA</b>	<b>2017 Project Needs Addressed (in 2017 Dollars)<sup>10</sup></b>	<b>2023 Projected Costs of 20-Year Needs from 2023 PNA</b>
Chelsea Houses	\$92,779,624	\$3,127,925	\$178,933,772
Chelsea Houses Addition	\$27,465,820	\$800,000	\$47,501,323
Elliott Houses	\$139,182,628	\$4,270,942	\$255,225,394
Total Cost (across all work types needed to perform full capital repairs)	\$259,428,072	\$8,198,867	\$481,660,489

As shown in the table above, the 2023 PNA projected that across the full list of repairs needed for Chelsea Houses, Chelsea Houses Addition, and Elliott Houses, the 20-year need is equal to approximately \$481,660,489, which breaks down to approximately \$426,625 per apartment for the 20-year need. As shown in **Attachment B**, the 2023 PNA projected that across the full list of repairs needed for Chelsea Houses, Chelsea Houses Addition, and Elliott Houses, the 5-year need is equal to approximately \$423,716,301, which breaks down to approximately \$375,302 per apartment for the 5-year need.

#### **NYCHA'S 2023 FIVE YEAR CAPITAL PLAN**

Every year, NYCHA releases the Five-Year Capital Plan (the Plan) that identifies planned commitments for infrastructure improvements, major modernization, other systemic upgrades and repair, resiliency, and fortification of developments damaged or impacted by Superstorm Sandy in 2013. The Plan is based on the current federal capital funding outlook, funding from local elected officials and the City of New York, as well as remaining funding allocated for disaster recovery due to damage from Superstorm Sandy.

The 2023 Plan anticipates \$7.8 billion in Federal and City funds to address physical improvements to NYCHA's buildings. The City funding includes \$2.1 billion of the total \$2.8 billion allocated to address lead, mold, heating, elevators, and pests. Overall, of the \$8.612 billion dollars included in the Plan, 49.6 percent is from Annual Federal Capital Grants, 41.0 percent is from the City of New York, 6.4 percent comes from the State of New York, and 3.0 percent comes from other sources (Community Development Block Grant, Disaster Recovery, Other).

As explained in the Plan, funding available to NYCHA for capital improvements has failed to keep pace with growing needs and has historically declined. From 2001 to 2017, annual federal capital grants, NYCHA's largest source of funding, have declined by \$74 million, or 18 percent from \$420 million to \$346 million. Beginning in 2018 and continuing through 2022, Federal capital funding had increased substantially. NYCHA was awarded \$601 million in 2021 and \$709 million in 2022, but this level of funding does not approach the costs to perform the needed work.

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likely future needs and cost with a high degree of accuracy and reliability. The deterioration curve was updated based on analysis of data captured through inspection and observation activities at the 30 selected developments, then applied to all assets.

<sup>10</sup> The value of the needs that were identified during the 2017 PNA that have been addressed by completed Capital Projects since 2017.

Thus, despite the increase in appropriations to the Capital Fund program over the years, rising costs continue to result in cuts to the program. NYCHA's ability to make necessary repairs and upgrades to brickwork, roofs, elevators, building systems (such as heating and plumbing systems), and apartment interiors have been severely constrained because of these chronic funding gaps.<sup>11</sup> Further, due to these chronic funding gaps and the constraints of aged building stock, NYCHA's capital repairs program has not been able to keep pace with improvements in building technology and cost increases for construction, materials, and labor.

NYCHA has experienced a cumulative loss in Federal capital grant funding of \$581 million since 2001. This has led to only \$2.975 billion in total being invested in capital improvements during the years 2018 through 2022.

For 2023, NYCHA received \$753 million in Federal capital grant funding, of which approximately 40 percent (or \$301 million) would be utilized for capital projects and improvements across the entire NYCHA portfolio, and the remaining 60 percent (or \$452 million) would be utilized in other areas, including operations of the buildings, debt payments, and other non-capital projects related payments.

### **NYCHA'S 2023 FIVE YEAR OPERATING PLAN**

NYCHA's 2023 Five-Year Operating Plan (the Operating Plan) outlines NYCHA's priorities and strategies to address the challenges it faces with its available resources. The Operating Plan projects an operating deficit of \$35 million, with a deficit ranging from \$11 million to \$56 million between 2023 and 2027.

Funding for operating subsidy is based on congressional appropriation. Even with funding increases in recent years, national appropriations have historically been inadequate in meeting the needs of housing authorities. Historically, appropriations have fallen well short of funding levels required to fully fund public housing operations in accordance with HUD's eligibility formula. Additionally, with New York City's uniquely high construction costs and higher employment costs in comparison to other housing authorities across the United States, NYCHA has long advocated that the system is inequitable.

## **D. ALTERNATIVES ANALYSIS**

As described above, in 2021 NYCHA, in consultation with residents of Fulton and Elliott-Chelsea Houses, selected Elliott Fulton, LLC, a joint venture between Essence Development and The Related Companies, as NYCHA's PACT Partner to rehabilitate 100 percent of the residential units in Elliott-Chelsea Houses (and in Fulton Houses) and build new infill affordable and market-rate residential buildings to close the funding gap for the rehabilitation of the existing residential units. However, a comprehensive, five-month pre-design due diligence process completed by the PACT Partner in 2022 revealed significant, previously unanticipated capital repair needs and determined that extensive temporary relocation of residents would be required due to the particular conditions of major building systems. Because of capital repair needs that could not be addressed through rehabilitation (e.g., the elevators), inability of infill development to sufficiently fund the necessary rehabilitation, the significant budgeted funding gap with increased hard costs, and significant inconvenience to residents during construction, NYCHA and the PACT Partner proposed the full redevelopment of the Fulton and Elliott-Chelsea Houses after extensive consultation with, and input from, residents.

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<sup>11</sup> <https://www.nyc.gov/assets/nycha/downloads/pdf/capital-plan-2327.pdf>

As Elliott-Chelsea Houses are S/NR-eligible, NYCHA and the PACT Partner have considered two alternatives for purposes of the Section 106 process to avoid or minimize the adverse effect on Elliott-Chelsea Houses—a Preservation Alternative and a Partial Preservation with New Development Alternative. As the Rehabilitation and Infill Alternative discussed in the DEIS also considers a mix of preservation, demolition, and new development, it is briefly described with the Partial Preservation with New Development Alternative developed for purposes of the Section 106 process. The following analysis concludes it is not feasible to fully or partially preserve Elliott-Chelsea Houses as part of the Proposed Project while also meeting the identified purpose and need of the Proposed Project, and there is no feasible alternative to the demolition of Elliott-Chelsea Houses. This analysis is described below.

## **PRESERVATION ALTERNATIVE**

To avoid the adverse effect to Elliott-Chelsea Houses, NYCHA and the PACT Partner first evaluated whether it would be feasible to preserve Elliott-Chelsea Houses for continued public housing use for the existing NYCHA residents. Two scenarios of the Preservation Alternatives were considered— (1) a No-Action scenario and (2) a Rehabilitation scenario. Under both scenarios, Elliott Houses, Children’s Center, Chelsea Houses, Chelsea Houses Addition, and the existing site design with paths, planted areas, and playgrounds would be preserved, and no new development would occur on the site. The two scenarios are described below.

### *SCENARIO 1: NO-ACTION*

Under the No-Action scenario of the Preservation Alternative, the existing units on site would remain as traditional Section 9 units, and NYCHA would carry out routine maintenance and repairs. These activities would include general bathroom renovations, boiler replacements, and roof repairs. A full list of anticipated 5-year and 20-year routine maintenance and repair needs for Elliott-Chelsea Houses, along with anticipated associated costs, was identified in NYCHA’s 2023 Physical Needs Assessment and is included in **Attachment B**. Major capital improvements, rehabilitation, or renovations subject to discretionary approvals such as the PACT/RAD rehabilitation program would not occur under the No-Action scenario of the Preservation Alternative. The No-Action scenario of the Preservation Alternative would not meet the purpose and need of 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 Elliott-Chelsea Houses site.

As described above, there are severe budget constraints that would limit the ability of NYCHA to undertake the full slate of needed routine maintenance and repairs for Elliott-Chelsea Houses. As noted above, the 5-year need for Elliott-Chelsea Houses is equal to approximately \$423,716,301 and the 20-year need is equal to approximately \$481,660,489, as determined by the PNA.

For 2023, NYCHA received \$753 million in Federal capital grant funding, of which approximately 40 percent (or \$301 million) would be used for capital projects and improvements across NYCHA’s portfolio of properties, and the remaining 60 percent (or \$452 million) would be used in other areas for NYCHA, including operations of the buildings, debt payments, and other non-capital projects related payment. That \$301, million, which would be used across a number of NYCHA properties, by itself would not be sufficient to address the \$423,716,301 5-year need for Elliott-Chelsea Houses as determined by the PNA. Federal capital grant funding at this level would also not be sufficient to meet the 20-year need for Elliott-Chelsea Houses as determined by the PNA.

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 Elliott-Chelsea Houses, and

the existing 1,112 residential units would largely remain in their current substandard and deteriorated condition. Additionally, waiting for needed repairs to be planned, funded, and occur would lead to further deterioration of these units and cause residents to remain in difficult and worsening living conditions until completed. Therefore, the No-Action scenario of the Preservation Alternative is not feasible and does not meet the identified purpose and need of the Proposed Project.

#### *SCENARIO 2: REHABILITATION*

Under the Rehabilitation scenario of the Preservation Alternative, the Elliott-Chelsea Houses would be converted to Project-Based Section 8 through a conventional PACT/RAD conversion. NYCHA would enter into a 99-year ground lease with the PACT Partner who would undertake a more comprehensive rehabilitation program of the Elliott-Chelsea Houses than would occur under the No-Action scenario. As described above, NYCHA selected Elliott Fulton, LLC, a joint venture between Essence Development and The Related Companies, as NYCHA's PACT Partner for the Proposed Project, and it assumed for purposes of this analysis that the PACT Partner would undertake the Rehabilitation scenario.

Even with the increased funding available through conversion to Project-Based Section 8, however, certain challenges remain at Elliott-Chelsea Houses that cannot be addressed through rehabilitation efforts. For instance:

- Elliott Houses would continue to only have one elevator per core, as it is not structurally possible to add or expand them to meet ADA requirements.
- Due to the layout of apartments throughout Elliott-Chelsea Houses, full ADA compliance regarding passage, turning radius, and roll-in showers is not achievable.
- The current brick facades would need to be maintained and regularly repaired to comply with the Facade Inspection Safety Program (FISP) even with reclad systems.
- The small trash chutes located in all buildings on the Elliott-Campus site cannot be enlarged or replaced due to limited shaft space.
- Asbestos-containing materials on the facade, ceiling, and floor would not be removed. The presence of asbestos-containing material on the facades of the Elliott-Chelsea Houses buildings poses a challenge, as it is located on the brick relieving angle, spandrel, and window exterior caulking. Complete removal of all exterior asbestos-containing materials would necessitate replacing the entire facade. Total removal of the asbestos-containing materials in the floor mastic would require grinding, which is both costly and logistically challenging.
- Throughout Elliott-Chelsea Houses, the electrical wiring in the path from the electrical closets to the unit panels cannot be replaced, as there is not enough space.
- Additional HVAC improvements throughout Elliott-Chelsea Houses would require more space for ducts and risers, thus limiting the ability to improve heating, cooling, and air quality throughout residences.
- Buildings 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.

Although the above conditions cannot be addressed under this alternative, the Rehabilitation scenario of the Preservation Alternative assumes that the following capital improvements would be undertaken to prolong the lifespan of Elliott-Chelsea Houses beyond 20 years and to improve the living conditions of the existing residents to the fullest extent possible: repair and make

practicable improvements to the electrical systems; abatement of lead, mold, and asbestos in apartments and common areas and of roofing and pipe insulation where needed; new roofing and insulation; masonry façade repairs; thermal envelope upgrades; fire stopping and caulking; interior renovations, including plaster repair, new doors and hardware, bathroom tile repair, common area ceiling and wall repair, painting, and new carpentry and appliances; modernization of the elevators with new drive and control systems, entrance assemblies, cabs, door packages, hoistway systems, and counterweights; plumbing improvements, including replacement of corroded gas piping, replacement of rooftop gravity tanks, apartment piping repairs, improvements to hot water and gas service, and replacement of sanitary and vent stacks, fire standpipe risers, and insulation; and outdoor site improvements, including new paving, plantings, playground surfacing and equipment, basketball court, benches, tables, and chairs.

Rehabilitation would severely inconvenience residents during construction and would require all 1,000+ households to be temporarily relocated in phases during certain rehabilitation activities. In this phased relocation, some residents would be living in temporary accommodations while other residents would continue occupying their apartments, living in buildings under active construction. The more than 1,105 residents would need to be temporarily relocated in phases, for an optimistic estimate of a minimum of three months per relocation while lead abatement is performed and the electrical and plumbing systems are improved. The three-month relocations of the residents would likely be longer due to the complexity of the rehabilitation program, delays in permitting, review and sign-off by the Department of Buildings, procurement times, and variances in building conditions and levels of deterioration identified during work. The relocations would be phased along with the construction that would be performed by apartment line (the column of units from top to bottom); when one group of residents moves back into a rehabilitated apartment line, the residents of the next apartment line to be rehabilitated would move out. As there is only one elevator per core in Elliott Houses, residents remaining in the buildings during construction would have to share the elevators with construction workers and general contractors. Replacing outdated elevator components would take four months, affecting the mobility of elderly and disabled residents, who would likely need to be relocated a second time during the elevator rehabilitation program. Further, rehabilitation would cause up to three years of dust, noise, and construction conditions, which could impact the health and wellbeing of residents. Despite the rehabilitation, residents, after being temporarily relocated, would still return to apartments in buildings with remaining, uncorrected substandard conditions.

Even with the additional funding for repairs that would be available through conversion to Project-Based Section 8, it is likely that funding would still fall short of the substantial 20-year capital investment needs of \$481,660,489 identified in the 2023 PNA—\$178,933,772 for the Chelsea Houses, \$47,501,323 for the Chelsea Houses Addition, and \$255,225,394 for the Elliott Houses. While the Rehabilitation scenario of the Preservation Alternative would remedy some substandard and deteriorated conditions at Elliott-Chelsea Houses, it would leave certain critical substandard conditions uncorrected as described above and would severely inconvenience residents during construction. In addition, it would not provide new units to existing NYCHA residents or new and affordable and market-rate housing units on the Elliott-Chelsea Houses site, removing the opportunity to create a stable funding source to maintain and operate the Section 8 PBV units on site into the future. Further, as described above, a key goal of the Proposed Project is providing new affordable and market-rate housing on the Elliott-Chelsea site to address the critical shortage of affordable housing and housing in general in New York City and to financially support the PACT portion of the Proposed Project. Finally, after rehabilitation, buildings on site would still be between 56 and 77 years old, leading to continuing substantial additional incremental capital and operating costs in the future. Therefore, the Rehabilitation scenario of the Preservation



Alternative is not feasible and does not meet the identified purpose and need of the Proposed Project.

## **PARTIAL PRESERVATION WITH NEW DEVELOPMENT ALTERNATIVE**

As it is not feasible to preserve the substandard and deteriorated Elliott-Chelsea Houses in their current condition with only routine maintenance and repairs, nor is it feasible to rehabilitate Elliott-Chelsea Houses to address the full range of required capital repairs and improvements, NYCHA and the PACT Partner evaluated an alternative that included a mix of preservation, demolition, and new development. Two scenarios of this alternative were considered: (1) an Infill Development Scenario and (2) a Chelsea Houses Redevelopment Scenario. The following section also evaluates the Rehabilitation and Infill Alternative that is discussed in the DEIS.

### *SCENARIO 1: INFILL DEVELOPMENT SCENARIO*

The New York City Zoning Resolution sets forth certain minimum distance requirements for two or more residential buildings on the same lot. These regulations require residential portions of buildings to be separated from each other by between 40 and 60 feet, depending on the presence or absence of legally required windows in facing walls. In accordance with these regulations, only one new building could be constructed on the Elliott-Chelsea Houses side under the Infill Development scenario of the Partial Preservation with New Development Alternative. This infill development would be an 11-story building containing 50 affordable units with a small, square footprint on the north side of West 26th Street between Elliott Houses Buildings 1 and 4 on the site of an existing playground (see **Attachment C**).

The location of the existing Elliott Houses Buildings 2 and 3 and Chelsea Houses 1 and 2, combined with zoning regulations pertaining to distance between buildings, would preclude the development of any new buildings on the southern block of Elliott-Chelsea Houses as there would be insufficient land area between the existing buildings to site new buildings with sufficiently sized floorplates.

Elliott Houses, Children's Center, Chelsea Houses, and Chelsea Houses Addition would undergo the same rehabilitation program that would occur under the Rehabilitation scenario of the Preservation Alternative. As with the Rehabilitation scenario of the Preservation Alternative, the full range of capital repairs and improvements that are required across Elliott Houses, Chelsea Houses, and Chelsea Houses Addition could not be addressed, and the existing residents of the preserved buildings would experience inequitable living conditions compared to the residents of the new infill buildings.

While the existing buildings on the Elliott-Chelsea Houses site would be preserved, this scenario would also result in an adverse effect to the historic resource. As the site plan, in which buildings are placed in a designed landscape, is a significant feature of Elliott-Chelsea Houses under National Register Criterion C, the introduction of a new building to the site would remove an open space feature of the resource and alter the site plan and setting of the historic buildings and the relationship of the historic buildings to each other. Further, this alternative, even with the funds generated through the new infill development, could not fully address the substandard and deteriorated conditions of Elliott-Chelsea Houses. This alternative would also only provide 50 new affordable units and would not provide new units for existing NYCHA residents or new market-rate housing units. Therefore, the Infill Development scenario of the Partial Preservation with New Development Alternative is not feasible and does not meet the identified purpose and need of the Proposed Project.

## *SCENARIO 2: CHELSEA HOUSES REDEVELOPMENT SCENARIO*

The Chelsea Houses Redevelopment scenario of the Partial Preservation with New Development Alternative includes the preservation of Elliott Houses 1-4, the Children's Center, and Chelsea Houses Addition, the demolition of Chelsea Houses 1 and 2, and the redevelopment of the Chelsea Houses 1 and 2 site with a new building. While all the buildings of Elliott-Chelsea Houses are considered eligible for S/NR listing because they were determined to be an intact and excellent representative example of an architectural style designed by the concept of "functional modernism," Chelsea Houses was selected for redevelopment under this scenario, because they were designed and built three decades into the development of NYCHA public housing and by themselves do not represent an innovation in public housing development, unlike Elliott Houses. The plan of the Chelsea Houses is not unique or innovative as the development of public housing developments with slab plans (of which the L-plan of the Chelsea Houses is a variation) in New York City date to the early 1950s. Further, Chelsea Houses do not possess any high artistic values.

In order to both replace the 425 existing NYCHA units in Chelsea Houses 1 and 2 and provide new affordable and market-rate units in a new building, this scenario of the Partial Preservation with New Development Alternative (like the Rezoning Alternative of the Proposed Project described below) would be subject to the City's Uniform Land Use Review Process (ULURP) and it assumes a zoning map amendment to establish zoning districts that would permit a maximum floor area ratio (FAR) of 12.0 within 100 feet of avenues and 8.0 along midblocks beyond 100 feet of avenues. Development under 12.0 FAR would maximize the number of affordable and market-rate units that could be provided on the Chelsea Houses site under this scenario in order to address the critical shortage of affordable housing and housing in general in New York City, which is a key purpose of the Proposed Project. See **Attachment D** for plans, illustrative massings, and sections for the new building that would be developed under this alternative.

Under the Chelsea Houses Redevelopment scenario of the Partial Preservation with New Development Alternative, a new 76-story building would be constructed on the site of Chelsea Houses. This building would be massed as two towers set on a two-story base. Above the base, there would be a 100-foot gap between the towers. The towers would have L-shaped footprints, and they would be massed with upper floor setbacks. The base would contain approximately 9,200 sf of commercial space and approximately 23,000 sf of community facility space. The new building would contain 425 NYCHA PBV housing units<sup>12</sup> to replace the 425 existing units in Chelsea Houses and 1,631 new affordable and market rate units. Construction of the new building would be phased with the east tower constructed first and includes the need to temporarily relocate residents who occupy the existing Chelsea Houses 2 for approximately three to four years.<sup>13</sup> This temporary relocation would be for a longer duration for a higher number of residents compared to the Proposed Project, and it would be challenging to find enough units in proximity to the Elliott-Chelsea Houses campus for the large number of temporarily relocated residents

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<sup>12</sup> As this scenario of the Partial Preservation with New Development Alternative assumes a zoning map amendment that would result in an increase in FAR, these 425 units would have to meet Mandatory Inclusionary Housing requirements like the Rezoning Alternative of the Proposed Project, which would also include a zoning text amendment to designate the site as a Mandatory Inclusionary Housing Area.

<sup>13</sup> The existing residents of Chelsea Houses 2 would temporarily relocate for three to four years while the east tower of the new building is constructed. When the east tower of the new building is completed, all the existing residents of Chelsea Houses 1 and 2 would permanently relocate to it.

Under the Chelsea Houses Redevelopment scenario of the Partial Preservation with New Development Alternative, Elliott Houses, Chelsea Houses Addition, and Children's Center would undergo the same rehabilitation program that would occur under the Rehabilitation scenario of the Preservation Alternative. As with the Rehabilitation scenario of the Preservation Alternative, the full range of capital repairs and improvements that are required across Elliott Houses and Chelsea Houses Addition could not be addressed, and the existing residents of the preserved buildings would experience inequitable living conditions compared to the residents of the new PBV housing in the new building.

At 76 stories and massed as two towers, the new building would be substantially taller and larger than the existing 11- and 12-story Elliott-Houses and the 14-story Chelsea Houses Addition. The only buildings in the area of comparable height to the new building are located north of West 30th Street at Manhattan West and the buildings located at Hudson Yards. Therefore, the new building located on the Elliott-Chelsea Houses site would result in an adverse effect to the historic resource by demolishing buildings that are eligible for S/NR listing, as well as altering the setting of Elliott Houses, Children's Center, and Chelsea Houses Addition through the removal of contributing historic buildings on the site and the introduction of an incompatible visual element to the setting of the buildings that would be preserved under this scenario.

While portions of the S/NR-eligible Elliott Houses would be preserved, the Chelsea Houses Redevelopment scenario of the Partial Preservation with New Development Alternative would result in an adverse effect through the removal of Chelsea Houses and the introduction of a 76-story building to the Elliott-Chelsea Houses site. Further, this alternative, even with the funds generated through the new development, could not fully address the substandard and deteriorated conditions of Elliott Houses and Chelsea Houses Addition. Therefore, the existing residents of those buildings would continue to live in buildings with critical substandard conditions uncorrected, and they would experience inequitable living conditions compared to the existing residents of Chelsea Houses who would be provided with new units and amenities in modern PBV housing. This alternative would also present urban design concerns through the development of a 76-story building in an area where the tallest buildings south of West 30th Street are 33 stories (500 West 30th Street and 520 West 30th Street).

An as-of-right version of this scenario could also be undertaken, in which the new development on the Chelsea Houses site is built under existing zoning. That new as-of-right development would be 37 stories and massed with two towers above a shared base. It would contain 425 NYCHA PBV-assisted housing units to replace the 425 existing units in the Chelsea Houses along with 476 new affordable and market rate units. The as-of-right development on the Chelsea Houses sites would still result in an adverse effect to Elliott-Chelsea Houses as it would remove contributing historic buildings on the site. The existing residents of Elliott Houses and Chelsea Houses Addition would also continue to live in buildings with critical substandard conditions uncorrected, and they would experience inequitable living conditions compared to the existing residents of Chelsea Houses who would be provided with new units and amenities in modern PBV-assisted housing. In addition, it would fall short compared to the Rezoning and Non-Rezoning Alternatives, discussed below, in fulfilling a key purpose of the Proposed Project to address the critical shortage of affordable housing and housing in general in New York City and to financially support the PACT portion of the Proposed Project. Finally, the as-of-right version would require the temporary relocation of all households of the 425 Chelsea Houses units.<sup>14</sup>

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<sup>14</sup> Under the as-of-right version of Chelsea Houses Redevelopment scenario, the existing residents of Chelsea Houses 2 would temporarily relocate for three to four years while the east tower of the new

Therefore, the Chelsea Houses Redevelopment scenario of the Partial Preservation with New Development Alternative is not feasible and does not meet the purpose and need of the Proposed Project.

#### *REHABILITATION AND INFILL ALTERNATIVE*

Discussed in the DEIS in response to public comments on the DSOW, this alternative would replace the Elliott Center with a 24-story residential building containing 110 housing units and convert the Children's Center to a health care center. The existing NYCHA units in Elliott Houses, Chelsea Houses, and Chelsea Houses Addition would be maintained as long-term Project-Based Section 8-assisted housing. This alternative also includes a rehabilitation program for Elliott Houses, Chelsea Houses, and Chelsea Houses Addition that would be similar to the rehabilitation program under the Chelsea Houses Redevelopment scenario of the Partial Preservation with New Development Alternative.

While portions of the S/NR-eligible Elliott Houses would be preserved, the Rehabilitation and Infill Alternative would result in an adverse effect through the removal of Elliott Center. Further, this alternative, like the alternatives discussed above, could not fully address the substandard and deteriorated conditions of Elliott Houses, Chelsea Houses, and Chelsea Houses Addition and would only provide 110 new housing units. Therefore, the Rehabilitation and Infill Alternative is not feasible and does not meet the identified purpose and need of the Proposed Project.

#### **REZONING ALTERNATIVE, NON-REZONING ALTERNATIVE, AND FULTON MID-BLOCK DENSITY ALTERNATIVE**

As it is not feasible to fully or partially retain Elliott-Chelsea Houses as part of the Proposed Project, NYCHA and the PACT Partner propose the demolition of Elliott-Chelsea Houses and redevelopment of the site to facilitate the replacement of existing NYCHA units with new Project-Based Section 8 housing units, as well as the construction of new affordable and market-rate units, and retail, supermarket, community facility, and medical office space. There are three options for the redevelopment of Elliott-Chelsea Houses—the Rezoning Alternative, Non-Rezoning Alternative, and Fulton Mid-Block Density Alternative. These alternatives assume the staged demolition of Elliott-Chelsea Houses, the temporary relocation of all residents in the 96-unit Chelsea Houses Addition, and redevelopment of the site with seven new buildings. As redevelopment of the site under the Fulton Mid-Block Density Alternative would be the same as under the Rezoning Alternative and would result in the same adverse effect to Elliott-Chelsea Houses, it is not described separately below. See **Attachment E** for site plans of the Rezoning and Non-Rezoning Alternatives.

Under the Rezoning Alternative, the seven new buildings would contain a total of 1,112 replacement NYCHA units, 1,666 new mixed-income units (501 permanently affordable units and 1,165 market rate units), 12,060 sf of local retail, 11,000 sf of supermarket, 90,143 sf of community facility neighborhood center, 8,215 sf of daycare, and 11,285 sf of medical office uses. To facilitate the development program, the Rezoning Alternative includes the following discretionary actions to be sought from the City Planning Commission through ULURP: a zoning map amendment to permit a maximum FAR of 12.0 within 100 feet of avenues and 8.0 along

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building is constructed. When the east tower of the new building is completed, all the existing residents of Chelsea Houses 2 and a portion of the existing residents of Chelsea Houses 1 would permanently relocate to it. Then, the remaining existing residents of Chelsea Houses 1 would temporarily relocate for three to four years while the west tower of the new building is constructed. When the west tower is completed, the remainder of the Chelsea Houses 1 residents would permanently relocate to it.

midblocks beyond 100 feet of avenue and, where needed and appropriate, a commercial overlay district to permit proposed retail and supermarket uses in building bases along avenue corridors; a zoning text amendment to designate the site as a Mandatory Inclusionary Housing (MIH) Area; and a large scale general development special permit to facilitate the proposed site plan by allowing a distribution of floor area without regard to zoning lot lines or district boundaries and location of buildings without regard for the applicable yard, court, distance between buildings or height and setback regulations. Under the Rezoning Alternative, the new buildings would mostly be connected and built to the lot lines, and their footprints would be arranged around internal open spaces that would be accessible from West 26th and West 25th Streets. Ranging in height from 17 to 39 stories, the new buildings would be compatible with the urban design of the surrounding neighborhood.

Under the Non-Rezoning Alternative, the seven new buildings would contain a total of 1,112 replacement NYCHA units, 823 new mixed-income units (247 affordable units and 576 market rate units), 117,640 sf of community facility neighborhood center, 9,449 sf of daycare, and 9,546 sf of medical office uses. Under the Non-Rezoning Alternative, the new buildings would also range in height from 17 to 39 stories. On the block between West 27th Drive and West 26th Street, building footprints would be similar to those under the Rezoning Alternative—mostly built to the lot lines and arranged around internal open spaces that front on West 26th Street. On the block between West 26th and West 25th Streets, there would be a wide through-block open space with buildings on either side, along with an internal open space within the footprint of the connected buildings on the eastern portion of the block.

The Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives would provide new, modern replacement buildings and apartments for all existing NYCHA residents of Elliott-Chelsea Houses, thereby resulting in an improvement to their living conditions that would not be feasible with either the Preservation Alternative or the Partial Preservation with New Development Alternative. Further, the Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives would provide new community facility neighborhood center, day care, and medical office uses that would serve both NYCHA residents and the surrounding community, while the Rezoning and Fulton Mid-Block Density Alternatives would additionally provide supermarket and local retail uses on the Elliott-Chelsea Houses site. The Preservation Alternative would not provide similar new uses. The Partial Preservation with New Development Alternative would provide 9,200 sf of commercial space and approximately 23,000 sf of community facility space.

While the Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives would require the temporary relocation of some residents during construction for three to four years similar to the other alternatives, only the residents of the 96 units in Chelsea Houses Addition would be temporarily relocated. Therefore, the Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives would minimize the number of households subject to temporary relocation compared to the other alternatives. Whereas remaining residents under the Rehabilitation scenario of the Preservation Alternative would live within buildings undergoing construction, remaining residents under the Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives would live adjacent to the construction of new buildings and would move into their new buildings in phases.

Demolition of Elliott-Chelsea Houses under the Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives would result in an adverse effect but would allow for the construction of a financially viable project that would provide 1,112 modern PBV housing units for the existing NYCHA residents and either 1,666 mixed-income units (501 affordable and 1,165 market rate) under the Rezoning and Fulton Mid-Block Density Alternatives or 823 mixed-income units (247 affordable and 576 market rate) under the Non-Rezoning Alternative. The new affordable units

provided by these alternatives would directly address the critical shortage of affordable housing in New York City by increasing the affordable housing stock, while the new market-rate units would address the overall City-wide housing shortage by generally increasing the supply of housing in the city and also financially supporting the PACT portion of the Proposed Project.

## **E. CONCLUSION**

As described above, NYCHA and the PACT Partner have considered alternatives to the demolition of Elliott-Chelsea Houses with the goal of avoiding or minimizing the adverse effect. Consistent with that goal, NYCHA and the PACT Partner explored the potential of preserving Elliott-Chelsea Houses, preserving a portion of Elliott-Chelsea Houses and redeveloping part of the site with replacement NYCHA units and new affordable and market-rate units, and demolishing Elliott-Chelsea Houses and fully redeveloping the site with replacement NYCHA units, affordable and market-rate units, and commercial, community facility, and medical office uses.

NYCHA and the PACT Partner evaluated an alternative that fully preserved the 56- to 77-year-old Elliott-Chelsea Houses for continued public housing and community center uses. As described above, one option of the Preservation Alternative (the No-Action scenario) assumed that the existing buildings would be preserved with only routine maintenance and repairs. With those repairs and maintenance, Elliott-Chelsea Houses would still largely remain in their current substandard and deteriorated condition and residents would continue to remain in difficult living conditions. Further, accounting for existing funding available to NYCHA for capital improvements across all NYCHA properties and with limited 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 Elliott-Chelsea Houses. Waiting for these needed repairs to be planned, funded, and occur would cause residents to remain in difficult living conditions until completed, and lead to continued deterioration of the buildings. Further, due to these chronic funding gaps, NYCHA's capital repairs program has not been able to keep pace with improvements in building technology and cost increases for construction, materials, and labor.

The second option of the Preservation Alternative (the Rehabilitation scenario) assumed that through a PACT conversion, a number of capital improvements would be undertaken to prolong the lifespan of Elliott-Chelsea Houses beyond 20 years and improve living conditions of existing residents to the fullest extent possible. However, as described above, the Rehabilitation scenario would still leave certain critical substandard conditions uncorrected, it would severely inconvenience residents during construction, and it would not provide new units of affordable and market rate housing on the Elliott-Chelsea Houses site. As described above, a key purpose of the Proposed Project is providing new affordable and market-rate housing on the Elliott-Chelsea site to financially support the PACT portion of the Proposed Project and to address the critical shortage of affordable housing and housing in general in New York City. Finally, after rehabilitation, buildings on the site would still be between 56 and 77 years old, leading to substantial additional incremental capital and operating costs in the future. Therefore, it would not be feasible to fully or partially preserve Elliott-Chelsea Houses while meeting the identified purpose and need of the Proposed Project.

As it is not feasible to preserve Elliott-Chelsea Houses, NYCHA and the PACT Partner evaluated an alternative that included a mix of preservation, demolition, and new development. As described above, one option of the Partial Preservation with New Development Alternative (the Infill scenario) assumed rehabilitating all existing Elliott-Chelsea Houses buildings and constructing one new building on the site, containing only 50 units of new mixed-income housing. While the Infill scenario would minimize the adverse effect to Elliott-Chelsea Houses, it would still result in an adverse effect through the removal of an open space feature and alteration of the site plan,

setting of the historic buildings, and relationship of the historic buildings to each other. Further, this scenario, like the Rehabilitation scenario of the Preservation Alternative, would not fully address the substandard and deteriorated conditions of Elliott Houses, Chelsea Houses, and Chelsea Houses Addition, and the existing residents of those buildings would experience inequitable living conditions compared to the residents of the new infill buildings. The Infill scenario would also provide significantly fewer new affordable and market rate units than the Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives.

The second option of the Partial Preservation with New Development Alternative (Chelsea Houses Redevelopment scenario) includes preserving Elliott Houses, the Children's Center, and Chelsea Houses Addition, demolishing Chelsea Houses, and redeveloping the site of Chelsea Houses to 12.0 FAR with a new 76-story building containing 425 replacement NYCHA units, 1,631 new affordable and market-rate units, and commercial and community facility space. This option would require discretionary actions and be subject to ULURP similar to the Rezoning Alternative. While this alternative would minimize the adverse effect to the Elliott-Chelsea Houses, it would still result in an adverse effect through the removal of Chelsea Houses and the introduction of a new 76-story building to the Elliott-Chelsea Houses site. Further, this alternative, like the Rehabilitation scenario of the Preservation Alternative, would not fully address the substandard and deteriorated conditions of Elliott Houses and Chelsea Houses Addition. The existing residents of those buildings would continue to live in buildings with critical substandard conditions uncorrected, and they would experience inequitable living conditions compared to the existing residents of Chelsea Houses who would be provided with new units and amenities in modern PBV-assisted housing. This alternative would also present urban design concerns through the development of a 76-story building in an area where the tallest buildings south of West 30th Street are 33 stories. An as-of-right version of this scenario could also be undertaken, in which the new development on the Chelsea Houses site is built under existing zoning. That new as-of-right development would still result in an adverse effect to Elliott-Chelsea Houses as it would remove contributing historic buildings on the site. In addition, with 476 affordable and market-rate units it would fall short compared to the Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives in fulfilling a key purpose of the Proposed Project to address the critical shortage of affordable housing and housing in general in New York City and to financially support the PACT portion of the Proposed Project.

Similarly, the Rehabilitation and Infill Alternative, which is discussed in the DEIS in response to public comments on the DSOW, would result in an adverse effect through the removal of Elliott Center even though it would minimize the adverse effect to the Elliott-Chelsea Houses. Further, this alternative, like the Rehabilitation scenario of the Preservation Alternative, would not fully address the substandard and deteriorated conditions of Elliott Houses, Chelsea Houses, and Chelsea Houses Addition. The existing residents of those buildings would continue to live in buildings with critical substandard conditions uncorrected. In addition, with only 110 new housing units it would fall short compared to the Rezoning, Non-Rezoning, and Fulton Mid-Block Density Alternatives in fulfilling a key purpose of the Proposed Project to address the critical shortage of affordable housing and housing in general in New York City and to financially support the PACT portion of the Proposed Project.

Therefore, there is no prudent and feasible alternative to the demolition of the Elliott-Chelsea Houses, in consideration of the Proposed Project's purpose and need. NYCHA and the PACT Partner will work with SHPO and any other identified Section 106 consulting parties to develop measures to partially mitigate the adverse effect, which would be set forth in a Memorandum of Agreement pursuant to Section 106 of the National Historic Preservation Act.

## BIBLIOGRAPHY

- “16 Veterans Get New Homes Today,” *The New York Times*. December 31, 1946. pg. 10
- “Architects Picked for Housing Jobs,” *The New York Times*. July 6, 1943. pg. 30
- “A Start on Post-War Housing,” *The New York Times*. December 21, 1945. pg. 20
- “Cavity Walls and Slab Bands Cut Costs for Multi-Story Public Housing Project,” *Engineering News-Record*. A McGraw-Hill Publication. April 17, 1947. pp. 94-97
- “Chelsea Houses to Open,” *Daily News*. April 24, 1964. pg. 52
- “City Housing Plans Go To \$260,000,000: 16 Projects Added,” *The New York Times*. December 27, 1944. pg. 1
- “Coast Guard Gets Housing Project Site Along Tenth Avenue ‘for the Duration’,” *The New York Times*. October 2, 1942. pg. 10
- Elliott Fulton LLC, *Fulton & Elliott-Chelsea Houses Pre-Design Deliverable*, June 6, 2022
- “Elliott Houses Ground Broken by La Guardia,” *New York Tribune/Herald Tribune*. December 21, 1945. pg. 15
- Ennis, Thomas W., “Chelsea Blight is Under Attack,” *The New York Times*. July 5, 1959. pg. R1
- Ennis, Thomas W., “Chelsea Clean-Up Drive Grows Into Broad Rebuilding Program,” *The New York Times*. May 29, 1960. pg. R1
- “First Unit Opens in Elliott Houses,” *The New York Times*. January 1, 1947. pg. 35
- “Housing Project to Begin,” *The New York Times*. December 19, 1945. pg. 23
- “Lone Negro Family Moves in John Lovejoy Elliott Houses,” *New York Amsterdam News*. February 1, 1947. pg. 9
- McGoldrick, Joseph D., “Blueprints for a Greater New York,” *The New York Times*. April 30, 1944. pg. SM16
- Mackey, Linda. *Elliott-Chelsea Houses Resources Evaluation*. New York State Office of Parks, Recreation and Historic Preservation. October 18, 2023
- “More City Housing Set for After War,” *The New York Times*. June 24, 1942. pg. 35
- “Mothers ‘Sit In’ to Block to Block Playground Excavation,” *The New York Times*. April 7, 1962. pg. 26
- New York City Housing Authority, *Adopted Budget for FY 2023 and the Four-Year Financial Plan FY 2024–2027*, 2023
- New York City Housing Authority, *Capital Plan, Calendar Years 2023–2027*, December 22, 2022
- New York City Housing Authority, *Final PHA Agency Plan, Annual Agency Plan for Fiscal Year 2024*, October 17, 2023
- Plunz, Richard, *A History of Housing in New York City* (New York: Columbia University Press, 1990), 262
- Programmatic Agreement Among the New York State Historic Preservation Officer, the City of New York Department of Housing Preservation and Development, and the New York City Housing*



*Authority Regarding New York City Housing Authority Programs and Activities Funded by the United States Department of Housing and Urban Development*, September 18, 2018

SOCOTEC Engineering, Inc., *Pipe Condition Assessment – 419 West 17th Street, 401 West 19th Street, 420 West 26th Street, 436 West 27th Street, 450 West 27th Street, New York, NY*, August 2, 2022

Stern, Robert A.M., Thomas Mellins and David Fishman, *New York 1960, Architecture and Urbanism between the Second World War and the Bicentennial* (New York: The Monacelli Press, 1997), 309-311

STV, Inc. and AECOM, *New York City Housing Authority 2023 Physical Needs Assessment Final Report*, prepared for the New York City Housing Authority, 2023

“Tenants Win Play Area,” *The New York Times*. April 10, 1962. pg. 75

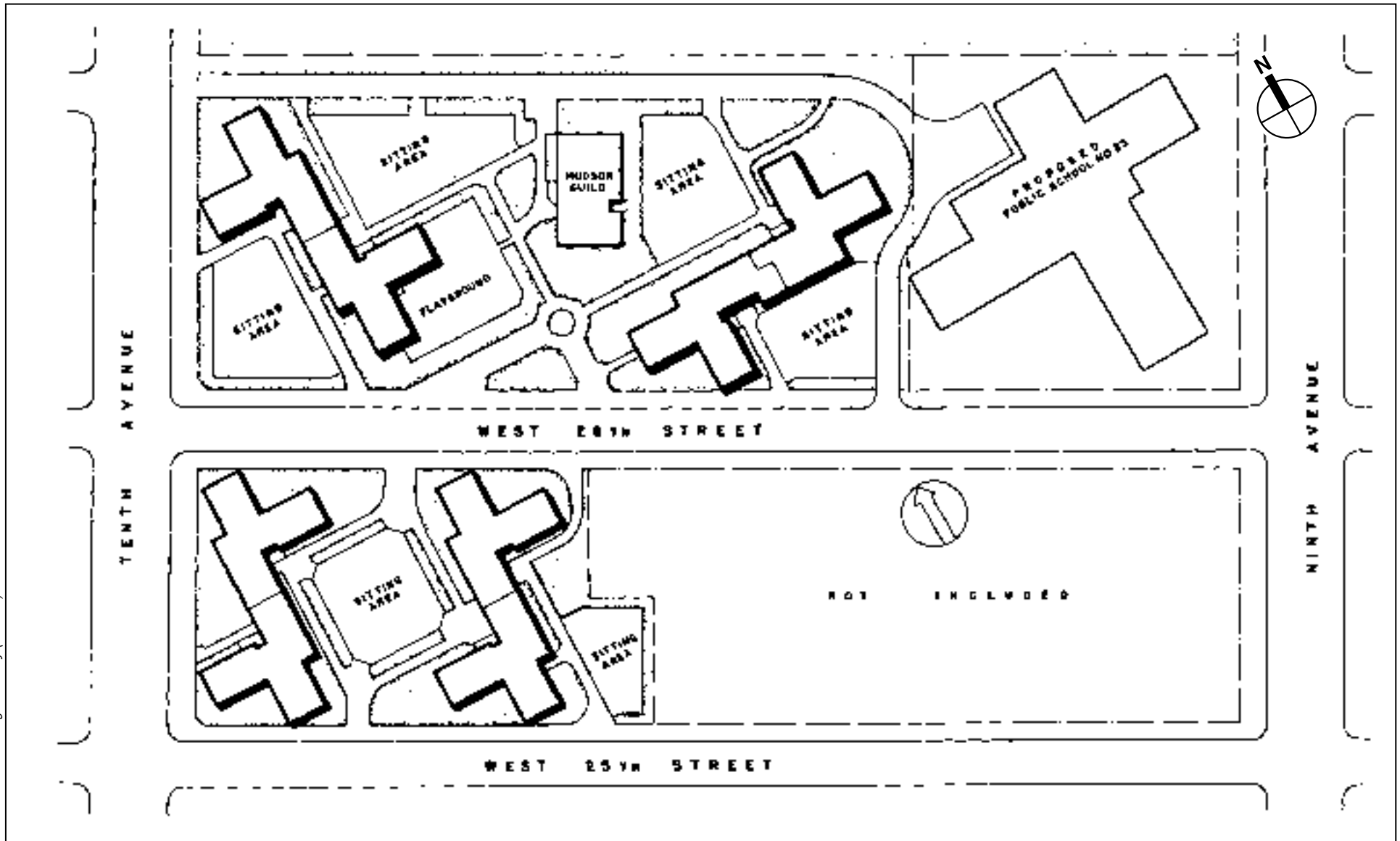
Tower, Samuel A., “Fleming Predicts ’47 Building Boom: Housing Project Here Which is Nearing Completion,” *The New York Times*. December 19, 1946. pg. 32

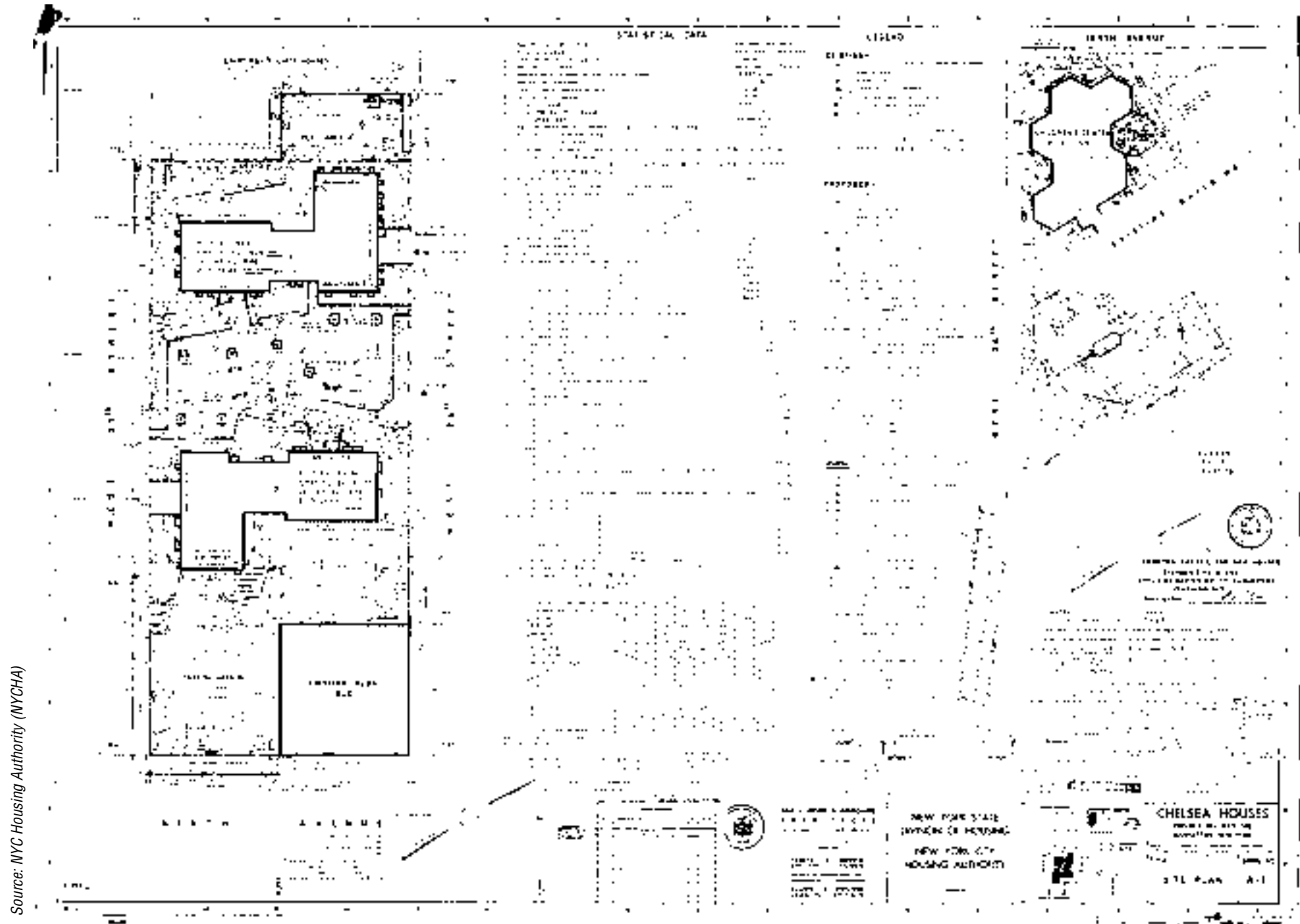
“Work is Started at Chelsea Apts.,” *Daily News*. April 3, 1962. pg. 48



-  Elliott-Chelsea Houses
-  Fulton Street Houses

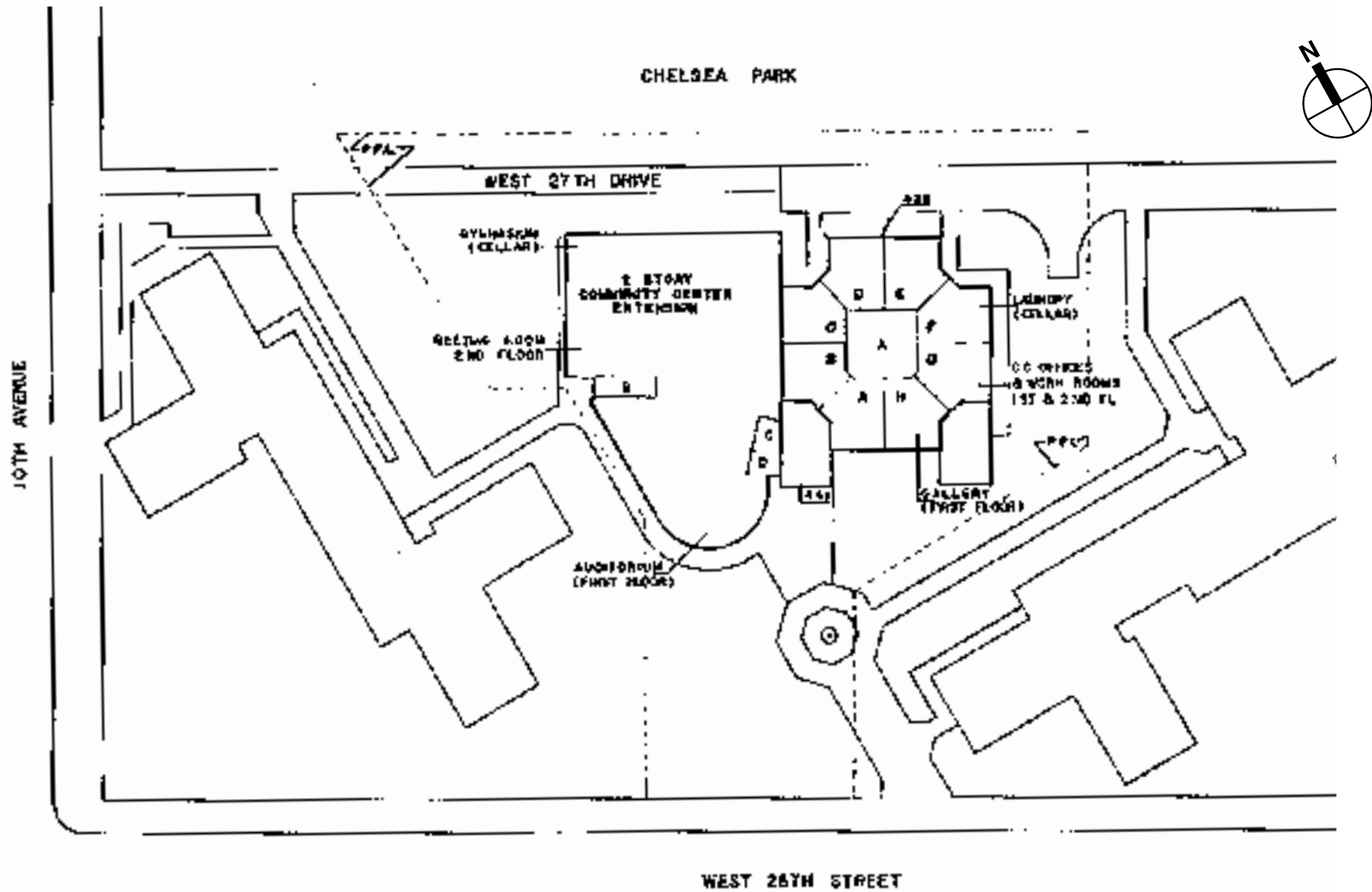
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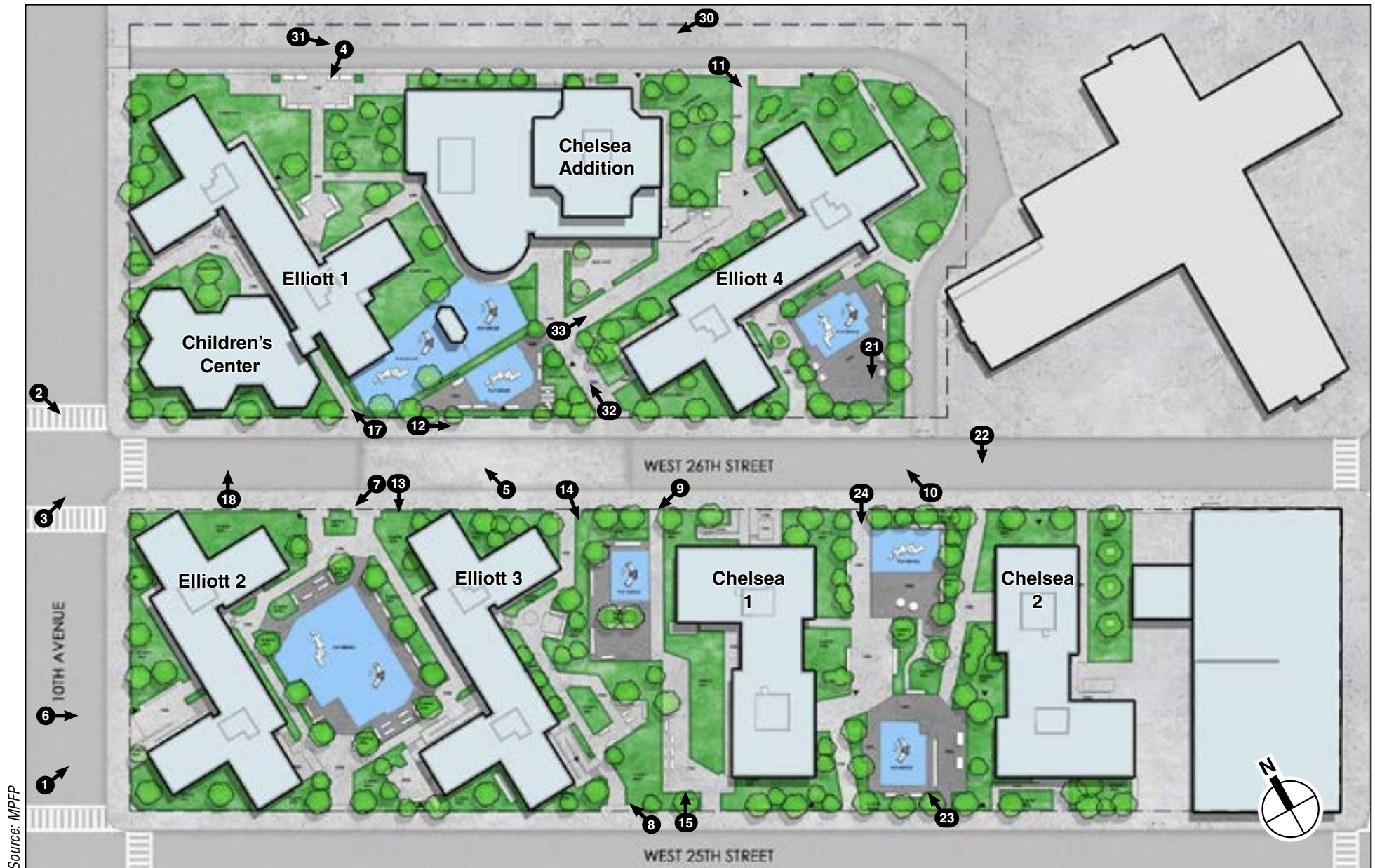


ELLIOTT-CHELSEA HOUSES  
SECTION 106 - ALTERNATIVE ANALYSIS

Chelsea Houses and Children's Center - 1961 Site Plan  
Figure 3







1 → Photograph View Direction  
and Reference Number

**ELLIOTT-CHELSEA HOUSES**  
**SECTION 106 - ALTERNATIVE ANALYSIS**

Elliott-Chelsea Houses Existing Site Plan  
**Figure 5**



Elliott Houses, view northeast at Tenth Avenue and West 25th Street

1



Elliott Houses, view southeast on West 26th Street from Tenth Avenue

2





Elliott Houses and Children's Center, view northeast at Tenth Avenue and West 26th Street

3



Elliott 1, view southwest on West 27th Street

4





Elliott 1, view northwest on West 26th Street 5



Elliott 2, view east from Tenth Avenue 6



Elliott 2, view southwest on West 26th Street 7



Elliott 3, view northwest on West 25th Street 8





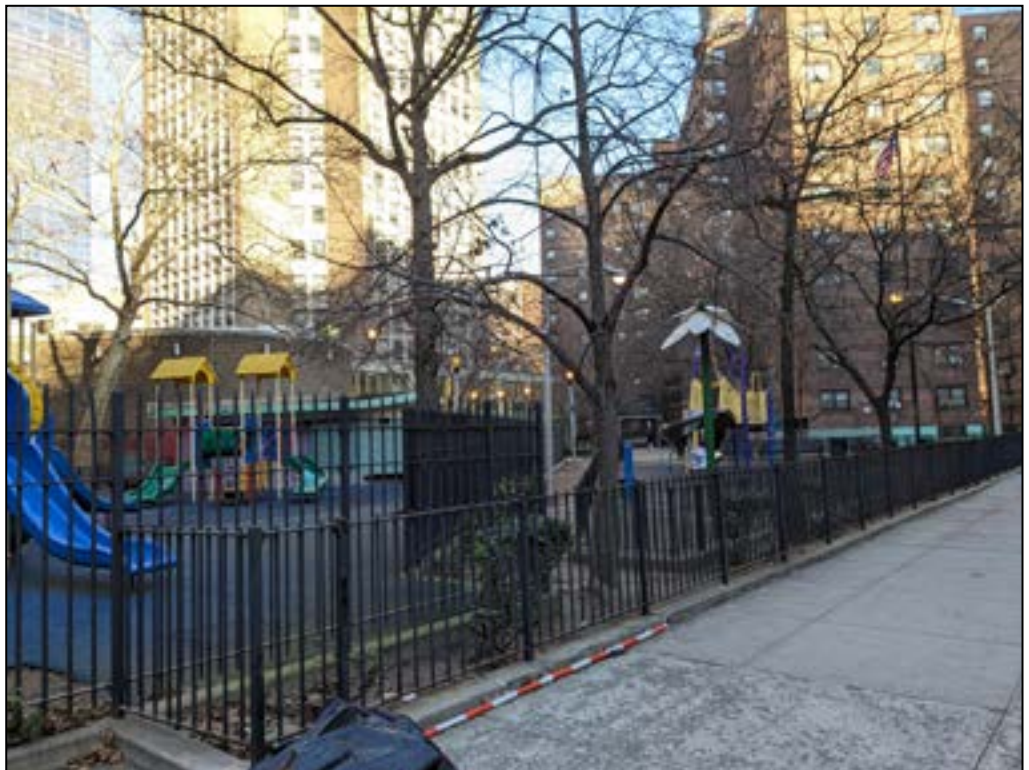
Elliott 3, view southwest on West 26th Street 9



Elliott 4, view northwest on West 26th Street 10



Elliott 4, view southeast on West 27th Street 11



Open space between Elliott 1 and Elliott 4, view east on West 26th Street 12





Open space between Elliott 2 and Elliott 3, view south from West 26th Street **13**



Open space between Elliott 3 and Chelsea 1, view south from West 26th Street **14**



Open space between Elliott 3 and Chelsea 1, view north from West 25th Street 15



Elliott 4, West 26th Street lobby 16





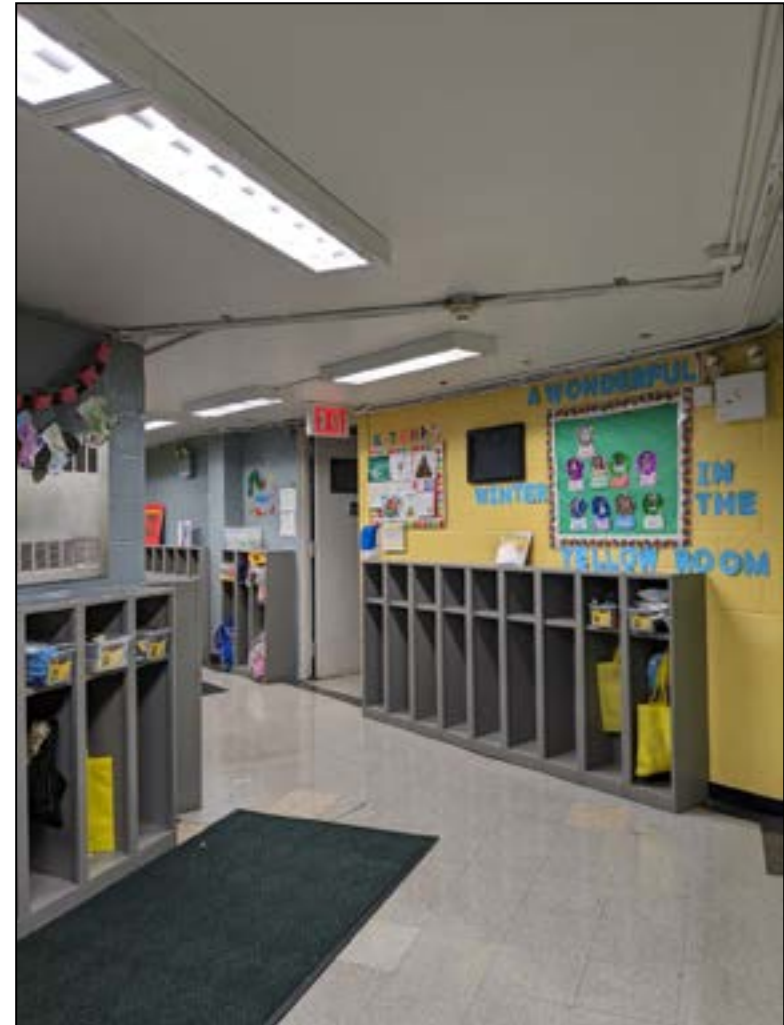
Children's Center, view northwest on West 26th Street 17



Children's Center, view north on West 26th Street 18



Children's Center hallway to Elliot 1 19



Children's Center hallway to playrooms 20





Chelsea 1, view south from Elliott 4 playground **21**



Chelsea 2, view south from West 26th Street **22a**



Chelsea 2, mosaic detail **22b**

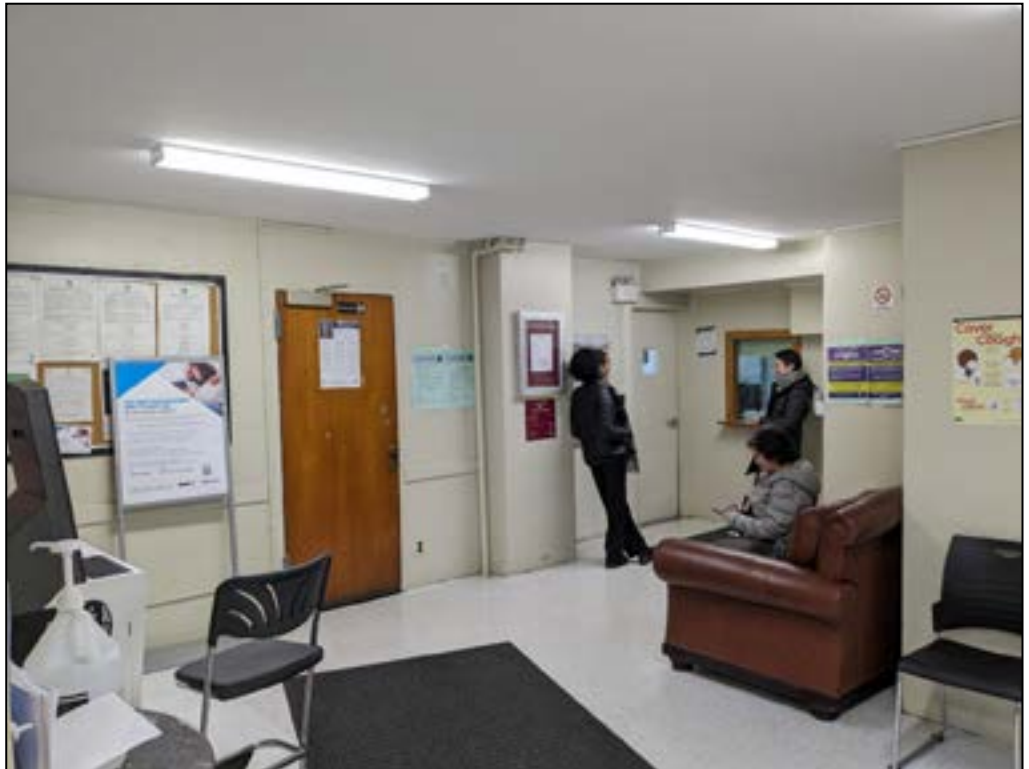




Open space between Chelsea 1 and Chelsea 2, view northwest from West 25th Street **23**



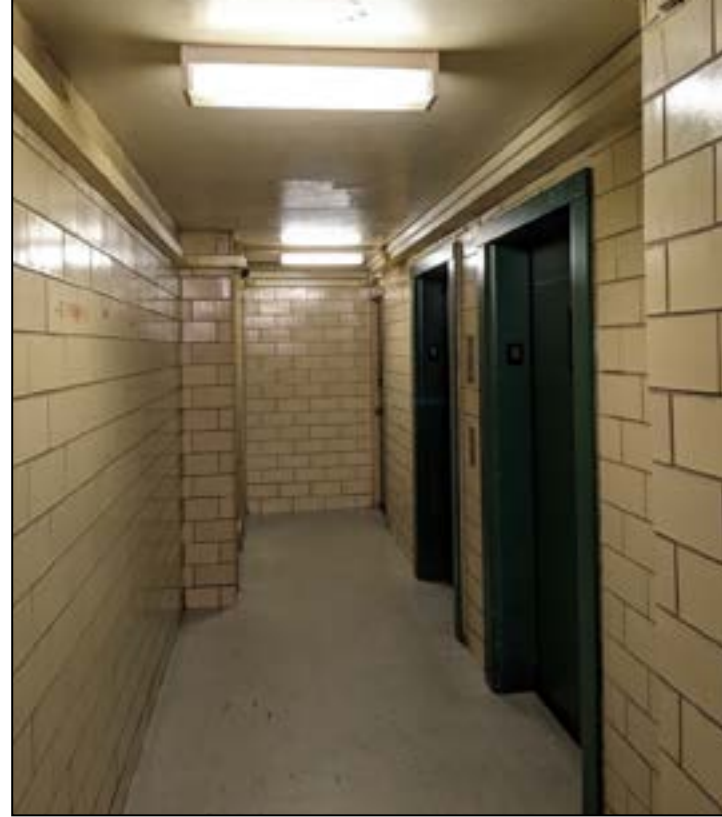
Open space between Chelsea 1 and Chelsea 2, view south from West 26th Street **24**



Chelsea 1, West 26th Street lobby 25



Chelsea 1, lobby onto open space between Chelsea 1 and Chelsea 2 26



Chelsea 1, 8th Floor hallway 27



Chelsea 1, Apt. 8D living/dining room 28





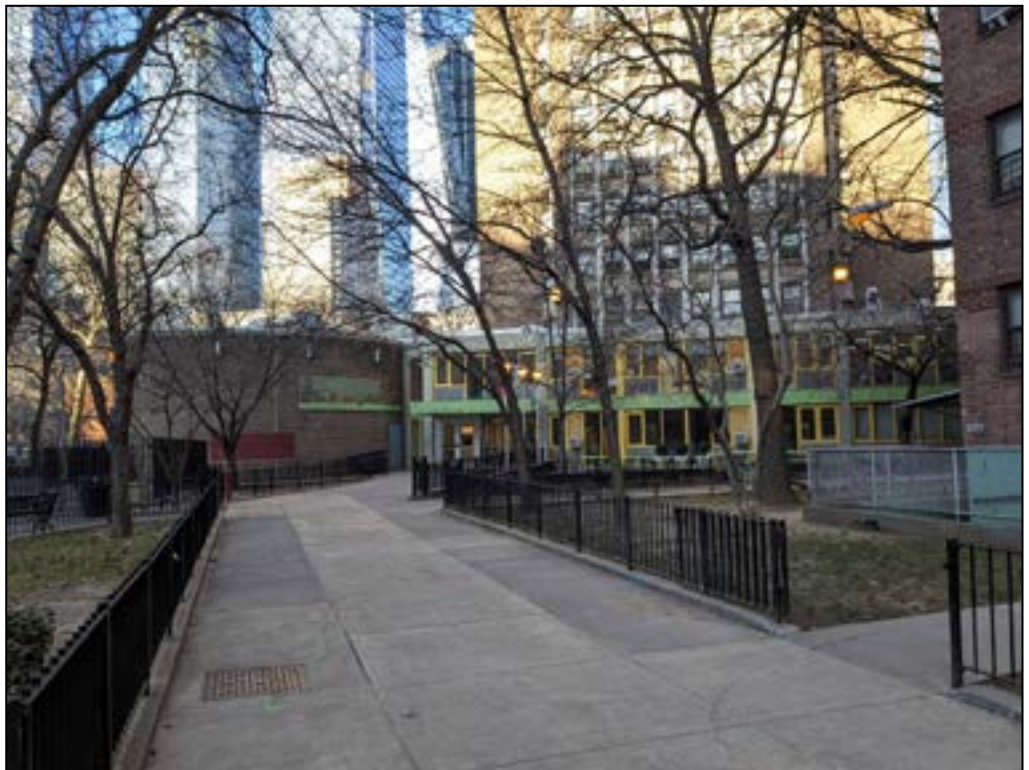
Chelsea 1, Apt. 8D bedroom 29



Chelsea Addition, view southwest across West 27th Street from Chelsea Park



Chelsea Addition and Elliott Center, view southeast on West 27th Street **31**



Elliott Center and Chelsea Addition, view north from West 26th Street **32**





Elliott Center and Chelsea Addition, view northeast between  
Chelsea Addition and Elliott 4 **33**



Elliott Center lobby **34**





Elliott Center ground-floor hallway 35



Elliott Center theater 36



Elliott Center below-grade basketball court **37**

**Attachment A:**  
**OPRHP Resource Evaluation**



## Resource Information:

**Date:** October 18, 2023  
**Staff:** Linda Mackey  
**Name:** Elliott-Chelsea Houses (NYCHA, 1947, 1964, 1968)  
**Location:** No Location Available

## Resource Status:

- Determination:** Determined SR/NR eligible by the Commissioner of the Office of Parks, Recreation and Historic Preservation on the date noted above.
- Contributing:** Not Determined

## Criteria for Inclusion in the National Register:

- ☒ Associated with events that have made a significant contribution to the broad patterns in our history.
- ☐ Associated with the lives of persons significant in our past.
- ☒ Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
- ☐ Have yielded, or may be likely to yield information important in prehistory or history.



No Photo Available



## Summary Statement:

The Chelsea-Elliott Houses is a combined public housing complex of the New York City Housing Authority (NYCHA), located between West 25th and 27th Streets and Ninth and Tenth Avenues in the Chelsea neighborhood of Manhattan. It consists of two contiguous public housing complexes that were originally separate but combined for administrative purposes: the John Lovejoy Elliott Houses, commonly known as Elliot



t Houses, was completed in 1947 and designed by architects Archibald Manning Brown and William Lescaze. The complex consists of four eleven- and twelve-story buildings. A one-story Children's Center was added to Elliot Houses Building No. 1 between 1954 and 1960 (architect unknown). The Chelsea Houses and Chelsea Addition constitute the second public housing complex. Chelsea Houses was built to the designs of Paul L. Wood & Associates and completed in 1964. It consists of two twenty-story buildings. Chelsea Addition is a standalone fourteen-story tower designed by Edelbaum & Webster Architects and completed in 1968.

The complex is significant under Criterion A in the following areas: (1) Social History, as a physical representation of the long-held concern that government was necessary to better the lives of the urban poor; and (2) Politics/Government, for the State and local government's acceptance of responsibility, through legislative and direct action, to assist in providing housing for low-income residents. The complex is also significant under Criterion C for the site plan and architectural design. The design and construction of the buildings and their placement in a designed landscape is representative of modern urban planning design theory of the period.

The buildings associated with Elliot and Chelsea Houses are an intact and excellent representative example of an architectural style defined by the concept of "functional Modernism" and driven by rapid construction and the need to keep costs low, where buildings reflect the utilitarian ideals of public housing, with unembellished lines and planes, flat roofs, and minimal architectural decoration. Of special note is the Elliot Houses Children's Center Mid-Century Modern design with its white and blue glazed brick/tile exterior and the geometric and exaggerated butterfly roofline. Chelsea Addition is an excellent and intact example of the Brutalist style with an exposed concrete frame with red brick walls and regular fenestration consisting of a deeply coffered grid of cast-in-place concrete window surrounds.

With the exception of the Wallabout Houses, a national defense housing development completed near the Brooklyn Navy Yard in 1941, Elliot Houses was the first publicly funded housing project composed exclusively of high-rise buildings. Though the complex's site planning reflected prewar precedents, several cost-cutting construction features were introduced at Elliot Houses that would soon become hallmarks of NYCHA's projects, including the employment of a concrete-column-and-slab structural system, red-brick cavity walls, and unfinished concrete-slab ceilings.

The period of significance is 1947 to 1968, encompassing the construction period of Elliot Houses, Chelsea Houses, and Chelsea Addition.

Sources:

Robert A.M. Stern. New York 1960: Architecture and Urbanism Between the Second World War and the Bicentennial. New York: The Monacelli Press, Inc., 1995.

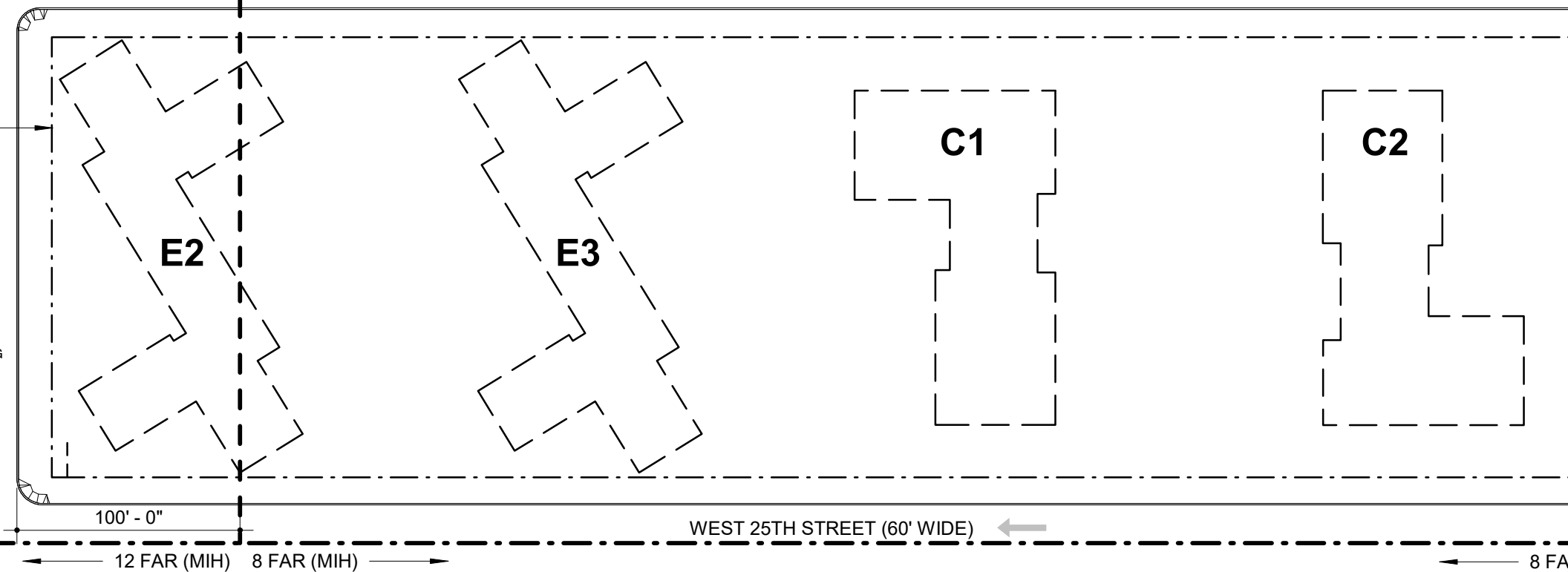
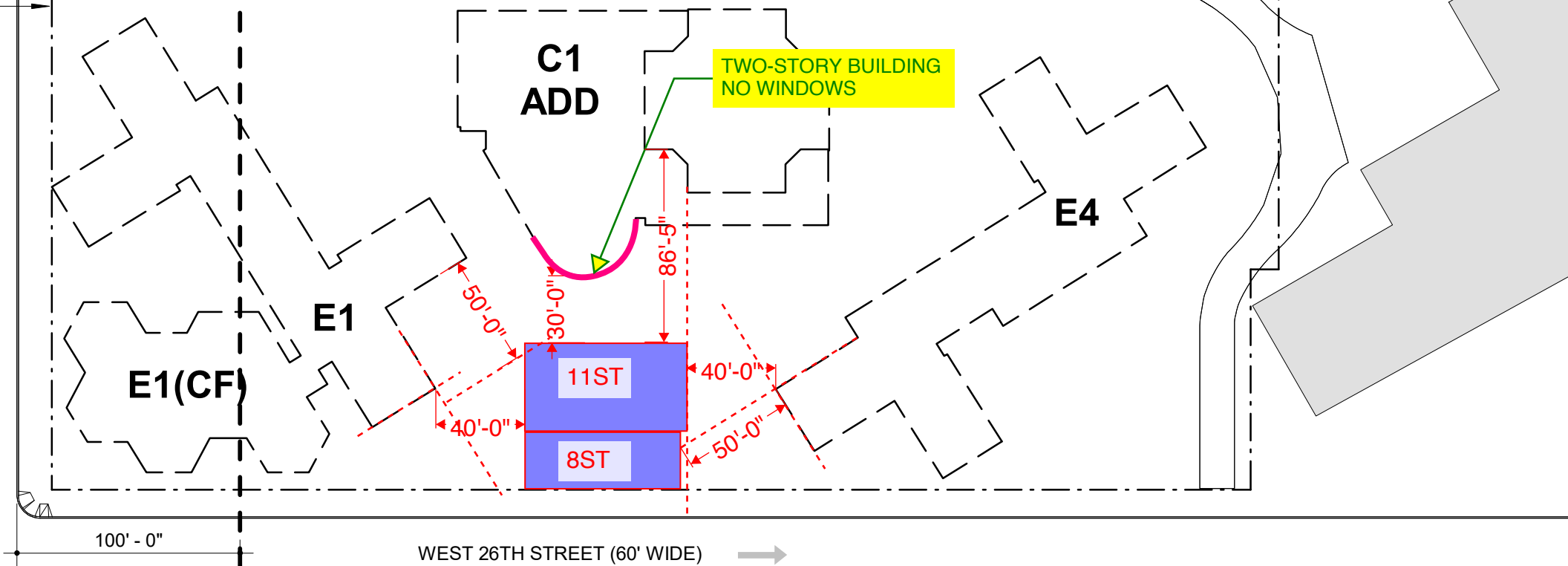
**Attachment B:**  
**Preservation Alternative No Action Scenario – Capital**  
**Improvements**

DEVELOPMENT	NUMBER	C PRIMARY WORK TYPE	SECONDARY WORK TYPE	5 YEAR NEED (\$)	20 YEAR NEED (\$)
CHELSEA	425	Apartments	Apartment 504 Access	\$ 1,000,000.00	\$ 1,000,000.00
CHELSEA	425	Apartments	Apartment Bathroom	\$ 21,727,554.80	\$ 21,727,554.80
CHELSEA	425	Apartments	Apartment Entrance Doors	\$ 2,773,601.00	\$ 2,773,601.00
CHELSEA	425	Apartments	Apartment Kitchen	\$ 16,221,605.85	\$ 16,221,605.85
CHELSEA	425	Apartments	Apartment Renovation	\$ 37,439,600.48	\$ 38,361,612.76
CHELSEA	425	Building Exterior/Facade/Window	Brickwork	\$ 7,006,067.21	\$ 7,006,067.21
CHELSEA	425	Building Exterior/Facade/Window	Building Windows	\$ 11,045,289.98	\$ 11,045,289.98
CHELSEA	425	Building Exterior/Facade/Window	Entrances/Exits	\$ 266,524.56	\$ 266,524.56
CHELSEA	425	Building Exterior/Facade/Window	Foundations	\$ 18,625.40	\$ 18,625.40
CHELSEA	425	Common Areas/Lobbies	Building Common Area Finishes	\$ 1,412,802.98	\$ 1,693,035.98
CHELSEA	425	Common Areas/Lobbies	Building Common Areas - Bathroom	\$ -	\$ 512,176.05
CHELSEA	425	Common Areas/Lobbies	Interior Building Doors	\$ 2,060,404.50	\$ 2,060,404.50
CHELSEA	425	Common Areas/Lobbies	Interior Building Stairs	\$ -	\$ 11,027,869.82
CHELSEA	425	Common Areas/Lobbies	Non Residential Kitchen	\$ 1,266,270.06	\$ 1,688,360.08
CHELSEA	425	Elevators	Elevators	\$ -	\$ 11,706,509.52
CHELSEA	425	Fire Protection	Fire Alarm	\$ 1,673.50	\$ 1,673.50
CHELSEA	425	Fire Protection	Standpipe System	\$ 25,862.97	\$ 25,862.97
CHELSEA	425	Grounds	Building Exterior Walkways and Retaining Walls	\$ 67,110.52	\$ 67,110.52
CHELSEA	425	Grounds	Landscaping	\$ 8,130.00	\$ 8,130.00
CHELSEA	425	Grounds	Lighting - Exterior Security	\$ 6,345.65	\$ 12,215.87
CHELSEA	425	Grounds	Open Spaces	\$ -	\$ 1,718,585.55
CHELSEA	425	Grounds	Parking Lot	\$ 315,418.50	\$ 315,418.50
CHELSEA	425	Grounds	Paving - Non-Vehicular Area	\$ 694,471.50	\$ 694,471.50
CHELSEA	425	Grounds	Site Fences	\$ 870,889.20	\$ 870,889.20
CHELSEA	425	Grounds	Site Lighting	\$ -	\$ 72,380.00
CHELSEA	425	Grounds	Stairs / Ramps	\$ 76,815.00	\$ 324,513.45
CHELSEA	425	Heating	Common Spaces Radiator / Convector / Baseboard	\$ -	\$ 447,277.48
CHELSEA	425	Heating	Decarbonization	\$ 29,912,291.33	\$ 29,912,291.33
CHELSEA	425	Interior Electrical/Lighting	Electrical System	\$ 1,581,990.20	\$ 2,901,656.17
CHELSEA	425	Interior Electrical/Lighting	Emergency and Exit Lighting and Panels	\$ 49,648.13	\$ 49,648.13
CHELSEA	425	Interior Electrical/Lighting	Interior Lighting Fixture	\$ 777,803.28	\$ 1,390,042.43
CHELSEA	425	Interior Electrical/Lighting	Telephone/Intercom	\$ -	\$ 74,112.48
CHELSEA	425	Lead Based Paint	Lead Based Paint	\$ 3,436,656.90	\$ 3,436,656.90
CHELSEA	425	Plumbing	Building Drainage	\$ 14,688.24	\$ 14,688.24
CHELSEA	425	Plumbing	Building Sewage System	\$ 78,733.84	\$ 78,733.84
CHELSEA	425	Plumbing	Roof Tank	\$ 1,138,364.78	\$ 1,138,364.78
CHELSEA	425	Plumbing	Underground Hydronic Piping	\$ 669,513.00	\$ 669,513.00
CHELSEA	425	Plumbing	Underground Natural Gas Piping	\$ 110,913.60	\$ 110,913.60
CHELSEA	425	Roofs	Building Roof/Parapets/Misc	\$ 2,723,779.54	\$ 2,723,779.54
CHELSEA	425	Safety And Security	Additional Security	\$ 1,959,392.40	\$ 1,959,392.40
CHELSEA	425	Safety And Security	CCTV	\$ -	\$ 280,561.96
CHELSEA	425	Ventilation/Air Conditioning	Air Conditioning	\$ 30,538.67	\$ 30,538.67
CHELSEA	425	Waste Management	Garbage Chute	\$ 2,589.36	\$ 2,589.36
CHELSEA	425	Waste Management	Waste Infrastructure	\$ 2,492,523.53	\$ 2,492,523.53
CHELSEA ADDITION	96	Apartments	Apartment 504 Access	\$ 200,000.00	\$ 200,000.00
CHELSEA ADDITION	96	Apartments	Apartment Bathroom	\$ 4,437,968.64	\$ 4,437,968.64
CHELSEA ADDITION	96	Apartments	Apartment Entrance Doors	\$ 626,507.52	\$ 626,507.52
CHELSEA ADDITION	96	Apartments	Apartment Kitchen	\$ 3,681,499.20	\$ 3,681,499.20
CHELSEA ADDITION	96	Apartments	Apartment Renovation	\$ 6,365,808.95	\$ 6,809,967.68
CHELSEA ADDITION	96	Building Exterior/Facade/Window	Brickwork	\$ 2,441,659.93	\$ 2,441,659.93
CHELSEA ADDITION	96	Building Exterior/Facade/Window	Building Windows	\$ 2,820,902.94	\$ 2,820,902.94
CHELSEA ADDITION	96	Building Exterior/Facade/Window	Entrances/Exits	\$ 149,386.15	\$ 149,386.15
CHELSEA ADDITION	96	Building Exterior/Facade/Window	Foundations	\$ 3,641.50	\$ 3,641.50
CHELSEA ADDITION	96	Common Areas/Lobbies	Building Common Area Finishes	\$ 1,407,930.35	\$ 1,407,930.35
CHELSEA ADDITION	96	Common Areas/Lobbies	Building Common Areas - Bathroom	\$ -	\$ 1,251,985.90
CHELSEA ADDITION	96	Common Areas/Lobbies	Building Gymnasium	\$ 336,197.84	\$ 336,197.84
CHELSEA ADDITION	96	Common Areas/Lobbies	Building Locker Room and Shower	\$ 20,980.00	\$ 20,980.00
CHELSEA ADDITION	96	Common Areas/Lobbies	Interior Building Doors	\$ 1,060,215.45	\$ 1,060,215.45
CHELSEA ADDITION	96	Common Areas/Lobbies	Interior Building Stairs	\$ -	\$ 1,754,433.84
CHELSEA ADDITION	96	Common Areas/Lobbies	Non Residential Kitchen	\$ 422,090.02	\$ 422,090.02
CHELSEA ADDITION	96	Elevators	Elevators	\$ 3,891,154.19	\$ 3,891,154.19
CHELSEA ADDITION	96	Fire Protection	Fire Alarm	\$ 1,673.50	\$ 224,968.88
CHELSEA ADDITION	96	Grounds	Building Exterior Walkways and Retaining Walls	\$ 3,288.62	\$ 3,288.62
CHELSEA ADDITION	96	Grounds	Lighting - Exterior Security	\$ 24,086.50	\$ 24,086.50
CHELSEA ADDITION	96	Grounds	Open Spaces	\$ -	\$ 893,572.25
CHELSEA ADDITION	96	Grounds	Paving - Non-Vehicular Area	\$ 132,429.25	\$ 132,429.25
CHELSEA ADDITION	96	Grounds	Site Fences	\$ 761,143.00	\$ 761,143.00
CHELSEA ADDITION	96	Grounds	Stairs / Ramps	\$ -	\$ 79,872.50
CHELSEA ADDITION	96	Heating	Common Spaces Radiator / Convector / Baseboard	\$ -	\$ 68,811.92
CHELSEA ADDITION	96	Heating	Decarbonization	\$ 6,756,658.74	\$ 6,756,658.74
CHELSEA ADDITION	96	Interior Electrical/Lighting	Electrical System	\$ 754,269.78	\$ 1,338,081.78
CHELSEA ADDITION	96	Interior Electrical/Lighting	Emergency and Exit Lighting and Panels	\$ 5,656.73	\$ 91,527.38

CHELSEA ADDITION	96	Interior Electrical/Lighting	Interior Lighting Fixture	\$ 292,579.31	\$ 355,267.79
CHELSEA ADDITION	96	Lead Based Paint	Lead Based Paint	\$ 1,044,669.12	\$ 1,044,669.12
CHELSEA ADDITION	96	Plumbing	Building Drainage	\$ 14,688.24	\$ 14,688.24
CHELSEA ADDITION	96	Plumbing	Building Sewage System	\$ 39,366.92	\$ 39,366.92
CHELSEA ADDITION	96	Plumbing	Roof Tank	\$ 163,646.90	\$ 163,646.90
CHELSEA ADDITION	96	Plumbing	Underground Hydronic Piping	\$ 714,147.20	\$ 714,147.20
CHELSEA ADDITION	96	Plumbing	Underground Natural Gas Piping	\$ 129,399.20	\$ 129,399.20
CHELSEA ADDITION	96	Roofs	Building Roof/Parapets/Misc	\$ 2,237,073.71	\$ 2,237,073.71
CHELSEA ADDITION	96	Safety And Security	Additional Security	\$ 919,837.80	\$ 919,837.80
CHELSEA ADDITION	96	Safety And Security	Intrusion Alarm	\$ -	\$ 107,323.29
CHELSEA ADDITION	96	Waste Management	Waste Infrastructure	\$ 84,940.69	\$ 84,940.69
ELLIOTT	608	Apartments	Apartment 504 Access	\$ 1,400,000.00	\$ 1,400,000.00
ELLIOTT	608	Apartments	Apartment Bathroom	\$ 28,523,194.28	\$ 28,523,194.28
ELLIOTT	608	Apartments	Apartment Entrance Doors	\$ 3,967,880.96	\$ 3,967,880.96
ELLIOTT	608	Apartments	Apartment Kitchen	\$ 23,277,812.65	\$ 23,277,812.65
ELLIOTT	608	Apartments	Apartment Renovation	\$ 51,269,185.57	\$ 53,098,273.76
ELLIOTT	608	Building Exterior/Facade/Window	Brickwork	\$ 10,504,263.70	\$ 10,504,263.70
ELLIOTT	608	Building Exterior/Facade/Window	Building Windows	\$ 26,744,489.97	\$ 26,744,489.97
ELLIOTT	608	Building Exterior/Facade/Window	Entrances/Exits	\$ 480,727.26	\$ 504,955.98
ELLIOTT	608	Building Exterior/Facade/Window	Foundations	\$ 102,318.25	\$ 102,318.25
ELLIOTT	608	Common Areas/Lobbies	Building Common Area Finishes	\$ 2,385,409.64	\$ 2,385,409.64
ELLIOTT	608	Common Areas/Lobbies	Building Common Areas - Bathroom	\$ 967,443.65	\$ 1,251,985.90
ELLIOTT	608	Common Areas/Lobbies	Interior Building Doors	\$ 2,759,424.10	\$ 2,759,424.10
ELLIOTT	608	Common Areas/Lobbies	Interior Building Stairs	\$ 988.75	\$ 9,462,399.79
ELLIOTT	608	Common Areas/Lobbies	Non Residential Kitchen	\$ 422,090.02	\$ 422,090.02
ELLIOTT	608	Elevators	Elevators	\$ 11,706,509.52	\$ 11,706,509.52
ELLIOTT	608	Fire Protection	Fire Alarm	\$ -	\$ 175,669.98
ELLIOTT	608	Fire Protection	Fire Sprinkler	\$ -	\$ -
ELLIOTT	608	Grounds	Building Exterior Walkways and Retaining Walls	\$ 83,275.56	\$ 85,885.96
ELLIOTT	608	Grounds	Landscaping	\$ 14,498.50	\$ 14,498.50
ELLIOTT	608	Grounds	Lighting - Exterior Security	\$ 135,457.72	\$ 135,457.72
ELLIOTT	608	Grounds	Open Spaces	\$ -	\$ 3,742,408.10
ELLIOTT	608	Grounds	Paving - Non-Vehicular Area	\$ 1,259,642.00	\$ 1,259,642.00
ELLIOTT	608	Grounds	Site Fences	\$ 2,230,326.00	\$ 2,230,326.00
ELLIOTT	608	Grounds	Site Lighting	\$ -	\$ 153,807.50
ELLIOTT	608	Grounds	Site Walls (Not Retaining Walls)	\$ 1,204.00	\$ 1,204.00
ELLIOTT	608	Grounds	Stairs / Ramps	\$ 120,818.30	\$ 889,842.60
ELLIOTT	608	Heating	Common Spaces Radiator / Convector / Baseboard	\$ -	\$ 851,547.51
ELLIOTT	608	Heating	Decarbonization	\$ 42,721,790.20	\$ 42,721,790.20
ELLIOTT	608	Interior Electrical/Lighting	Electrical System	\$ 1,056,542.36	\$ 5,645,117.70
ELLIOTT	608	Interior Electrical/Lighting	Emergency and Exit Lighting and Panels	\$ 127,701.28	\$ 127,701.28
ELLIOTT	608	Interior Electrical/Lighting	Interior Lighting Fixture	\$ 439,539.96	\$ 999,097.12
ELLIOTT	608	Lead Based Paint	Lead Based Paint	\$ 4,500,893.76	\$ 4,500,893.76
ELLIOTT	608	Plumbing	Building Drainage	\$ 44,064.72	\$ 44,064.72
ELLIOTT	608	Plumbing	Building Sewage System	\$ 196,834.60	\$ 196,834.60
ELLIOTT	608	Plumbing	Domestic Water System	\$ 7,818.50	\$ 7,818.50
ELLIOTT	608	Plumbing	Roof Tank	\$ 1,138,364.78	\$ 1,138,364.78
ELLIOTT	608	Plumbing	Underground Hydronic Piping	\$ 2,320,978.40	\$ 2,320,978.40
ELLIOTT	608	Plumbing	Underground Natural Gas Piping	\$ 212,584.40	\$ 212,584.40
ELLIOTT	608	Roofs	Building Roof/Parapets/Misc	\$ 7,189,424.32	\$ 7,189,424.32
ELLIOTT	608	Safety And Security	Additional Security	\$ 3,421,395.60	\$ 3,421,395.60
ELLIOTT	608	Ventilation/Air Conditioning	Air Conditioning	\$ 87,866.34	\$ 87,866.34
ELLIOTT	608	Waste Management	Exterior Compactor	\$ -	\$ 296,610.94
ELLIOTT	608	Waste Management	Garbage Chute	\$ 30,320.40	\$ 30,320.40
ELLIOTT	608	Waste Management	Waste Infrastructure	\$ 633,232.76	\$ 633,232.76
1129				\$ 423,716,301.13	\$ 481,660,489.45
cost per unit				\$ 375,302.30	\$ 426,625.77

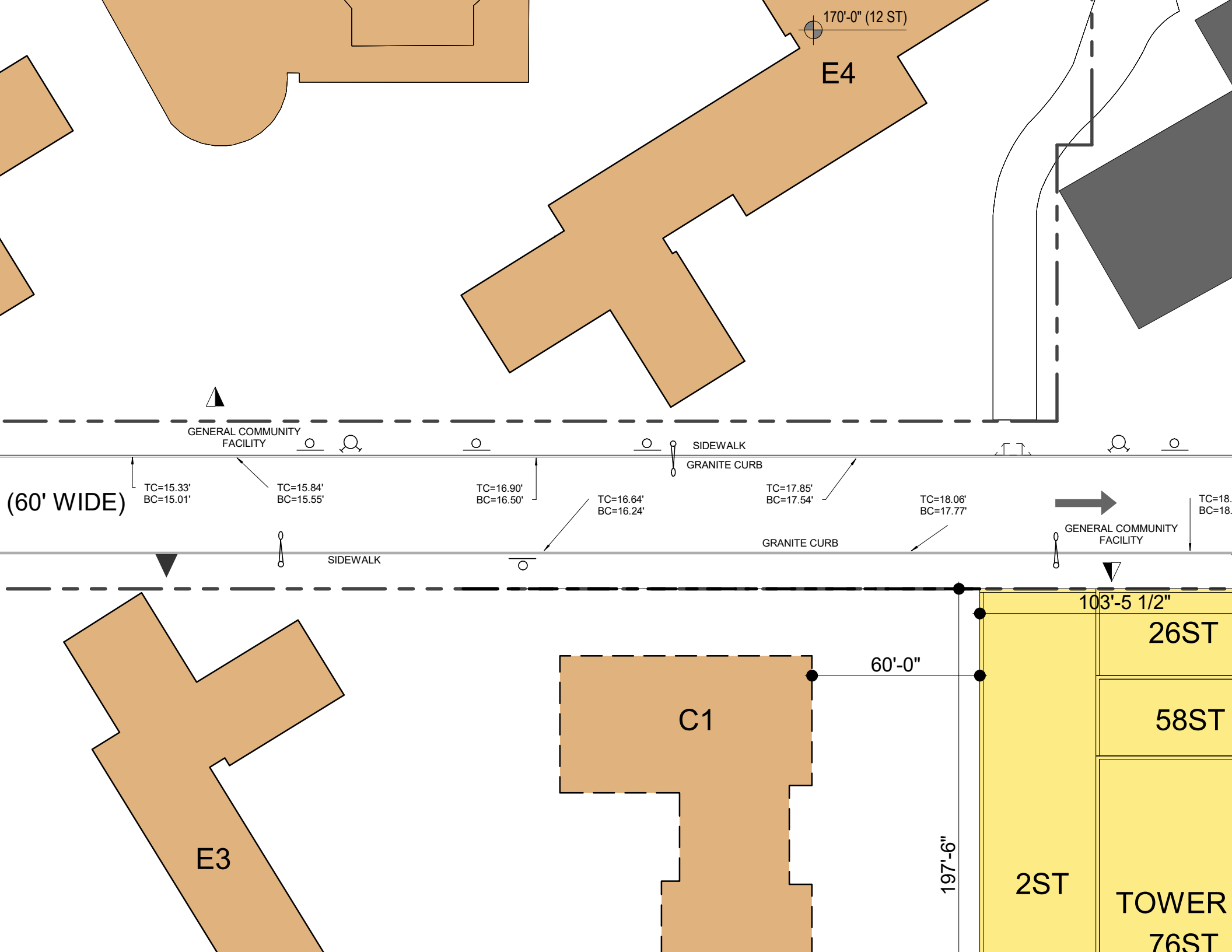


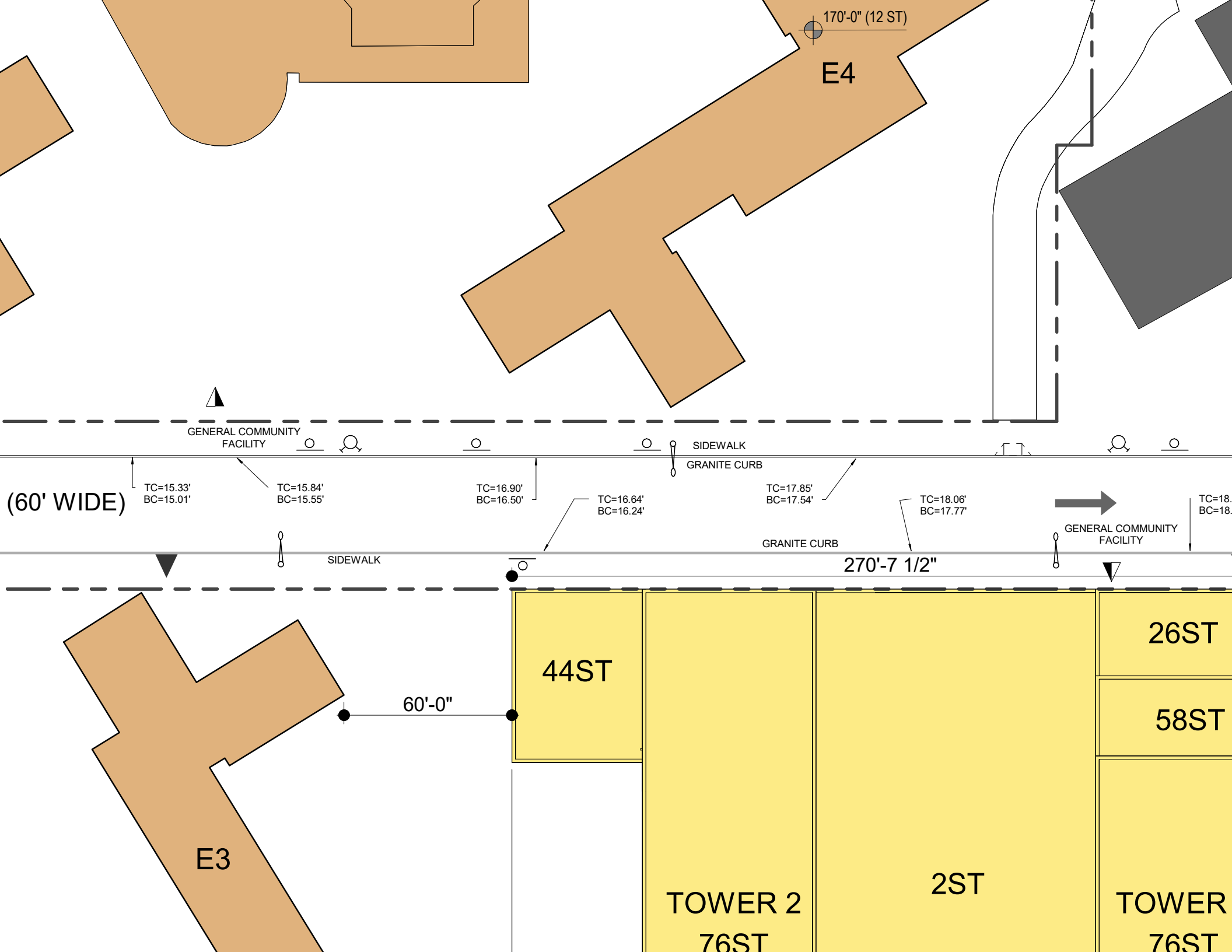
**Attachment C:**  
**Partial Preservation with New Development Alternative - Infill**  
**Development Scenario**

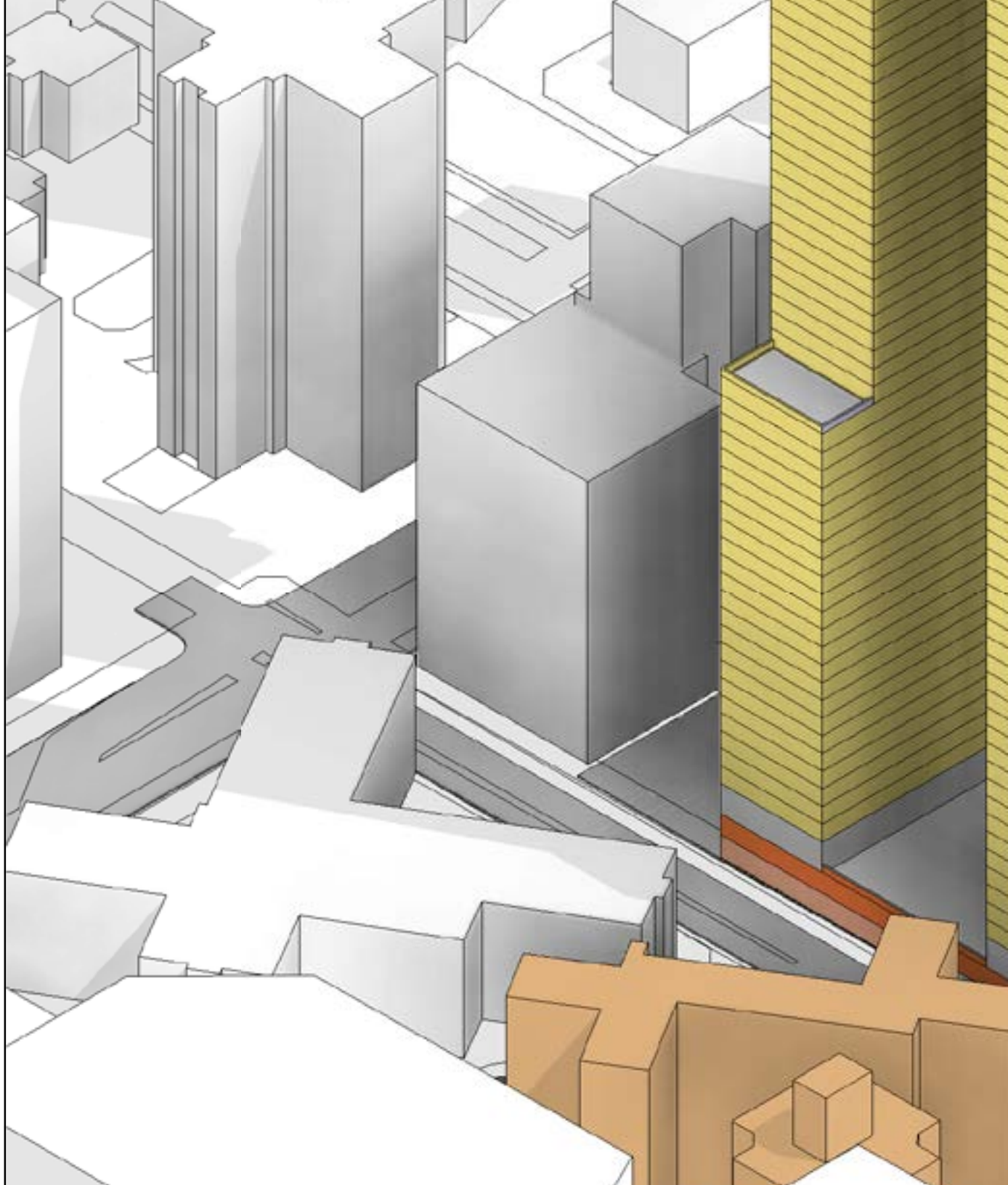


WITH PERMITTING COMMERCIAL  
USES ON LOWER FLOORS

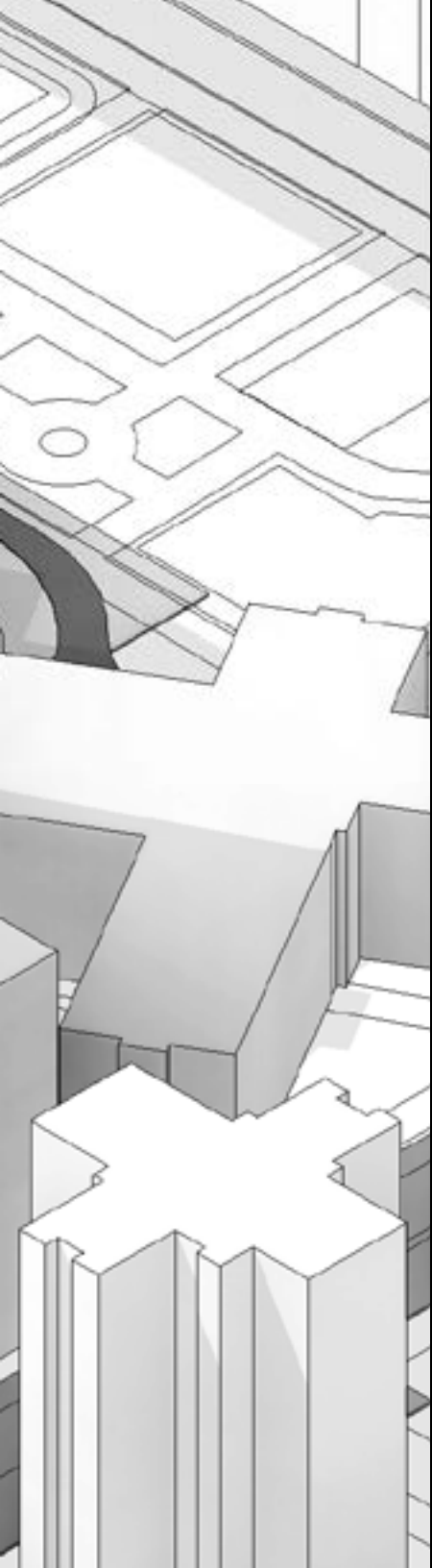
**Attachment D:**  
**Partial Preservation with New Development Alternative -**  
**Chelsea Houses Redevelopment Scenario**











PHASE 2:  
TOWER 2 =  
EXPAND  
PODIUM

C2

60' - 0"

197' - 6"

24' - 0"  
TYP.

HEALTHY GROCER  
9,225 SF

COMMUNITY FACILITY  
5,885 SF

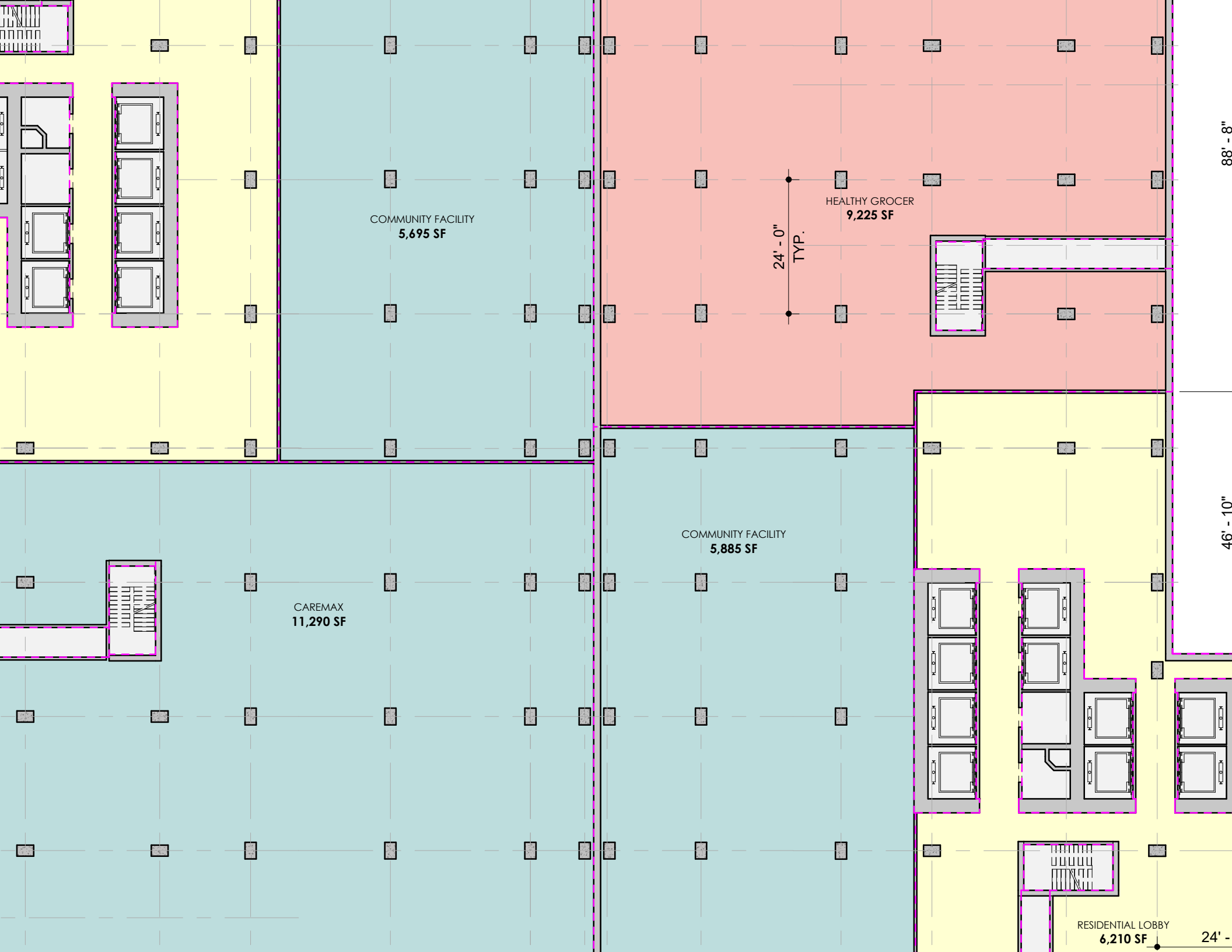
RESIDENTIAL LOBBY  
6,210 SF

46' - 10"

88' - 8"

24' -





COMMUNITY FACILITY  
5,695 SF

HEALTHY GROCER  
9,225 SF

24' - 0"  
TYP.

CAREMAX  
11,290 SF

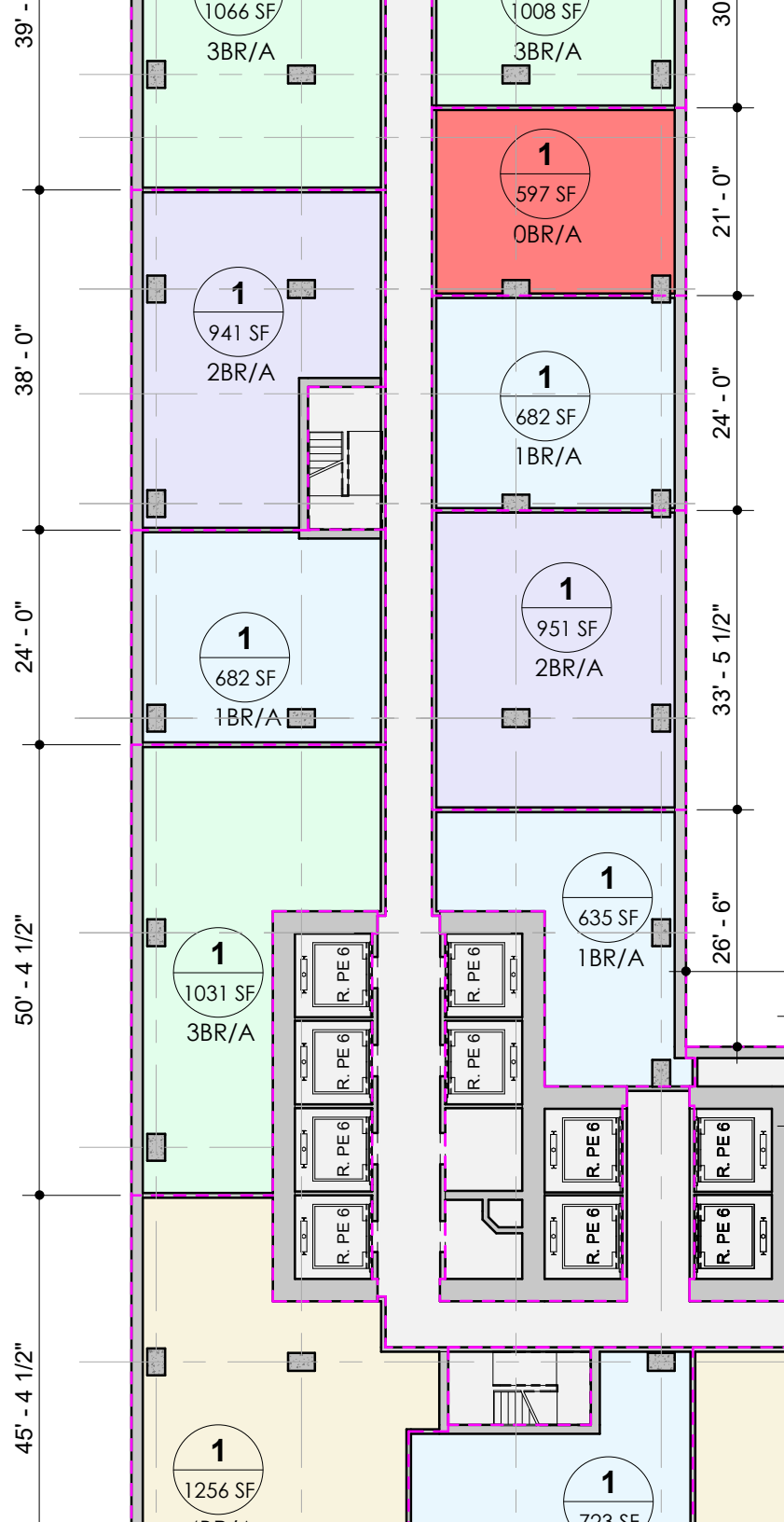
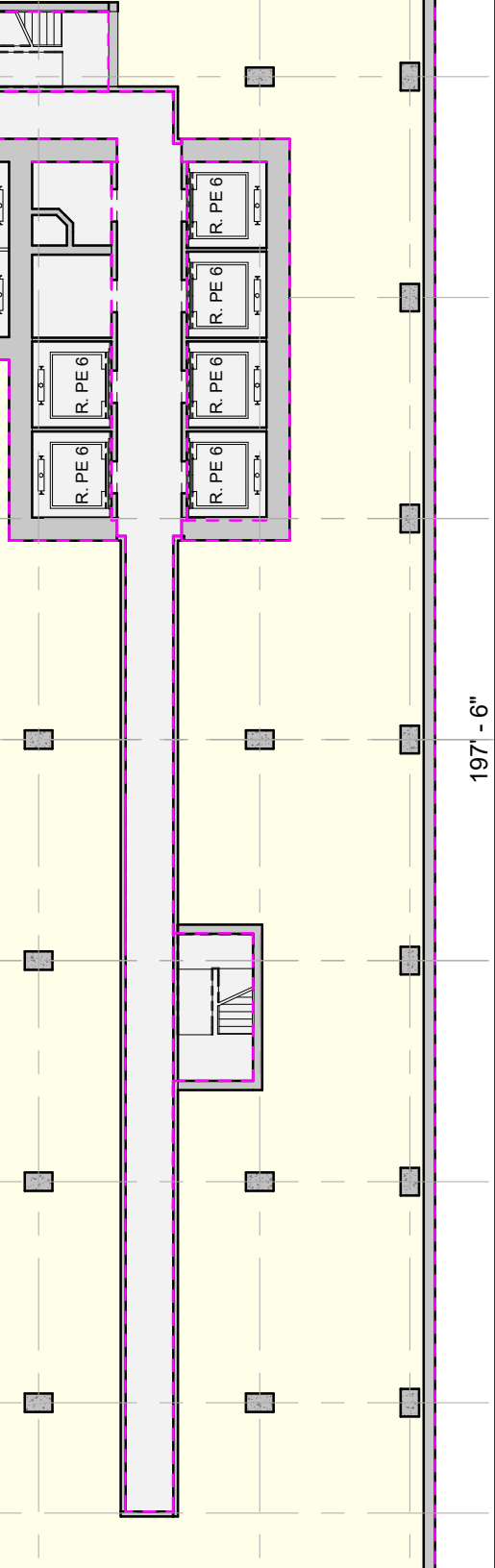
COMMUNITY FACILITY  
5,885 SF

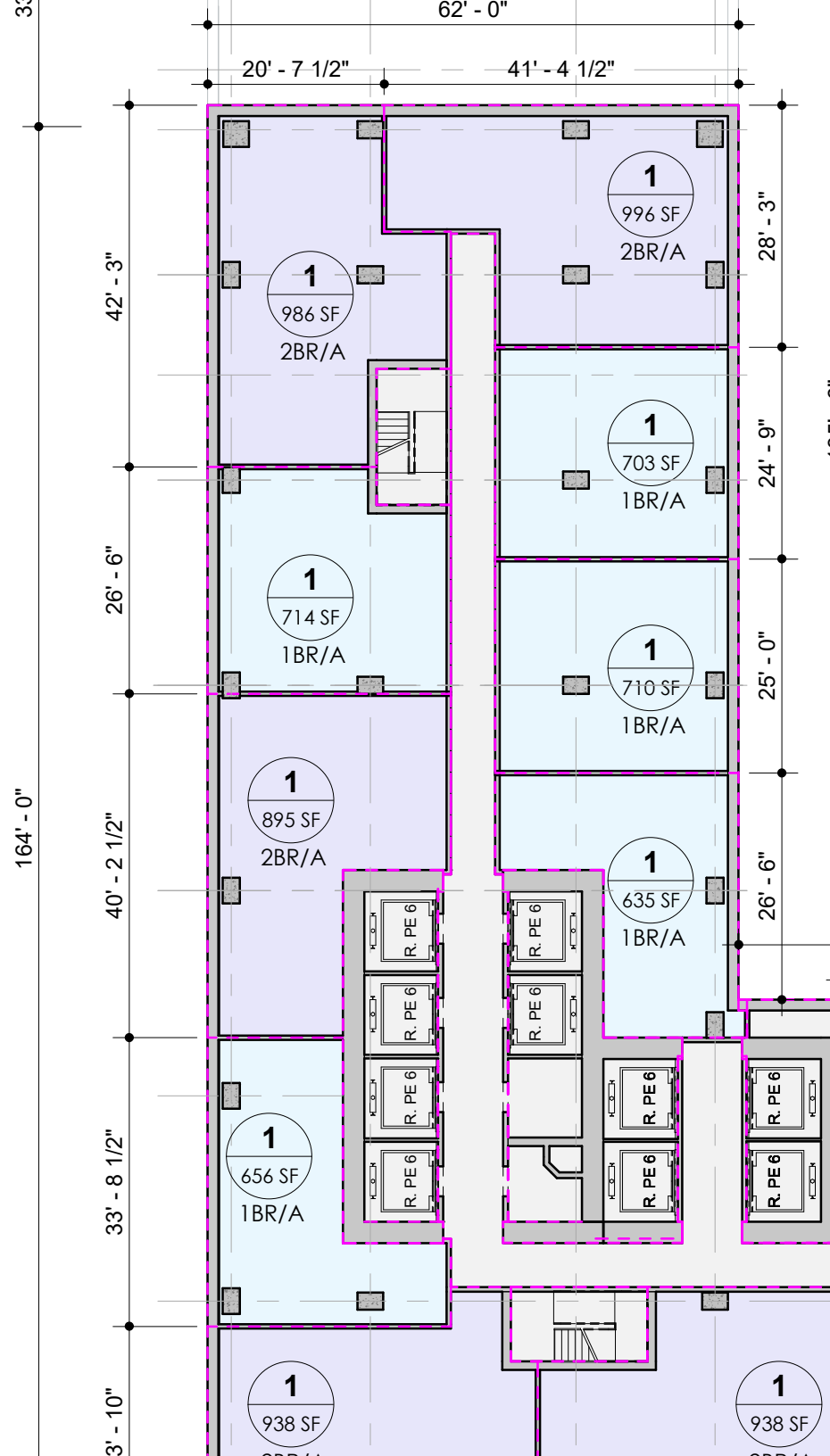
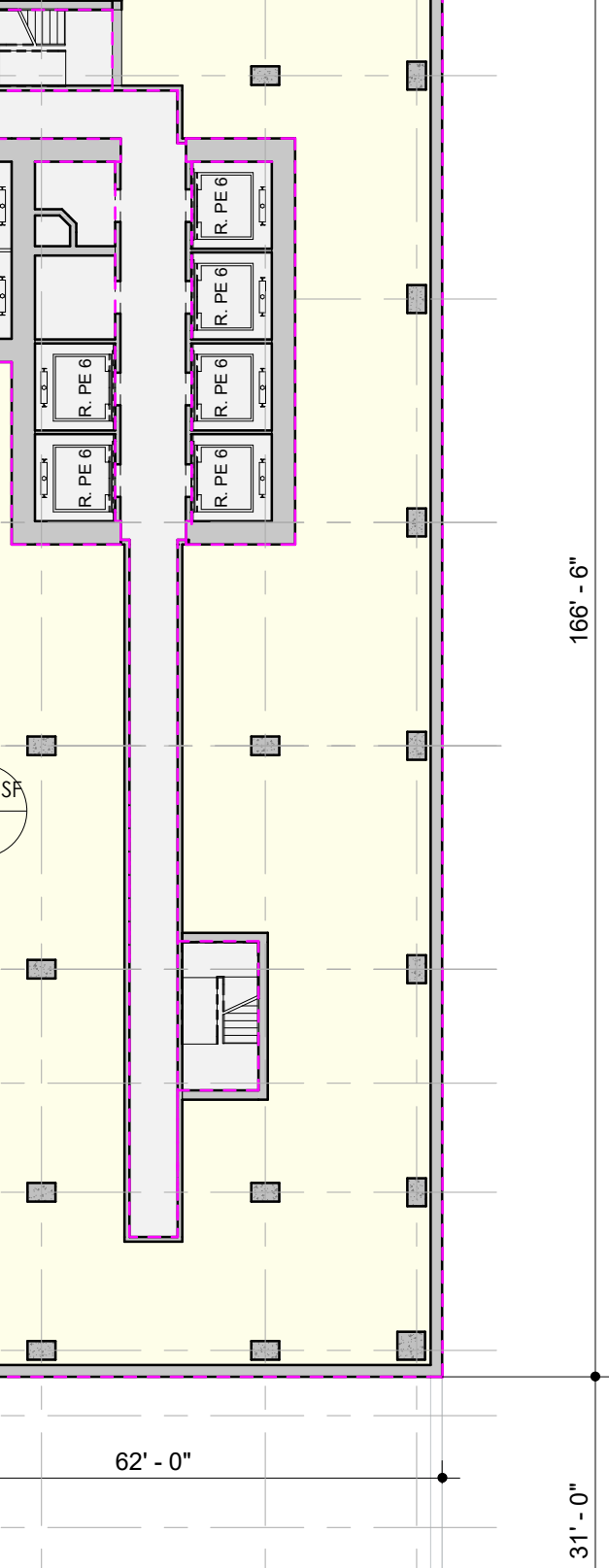
RESIDENTIAL LOBBY  
6,210 SF

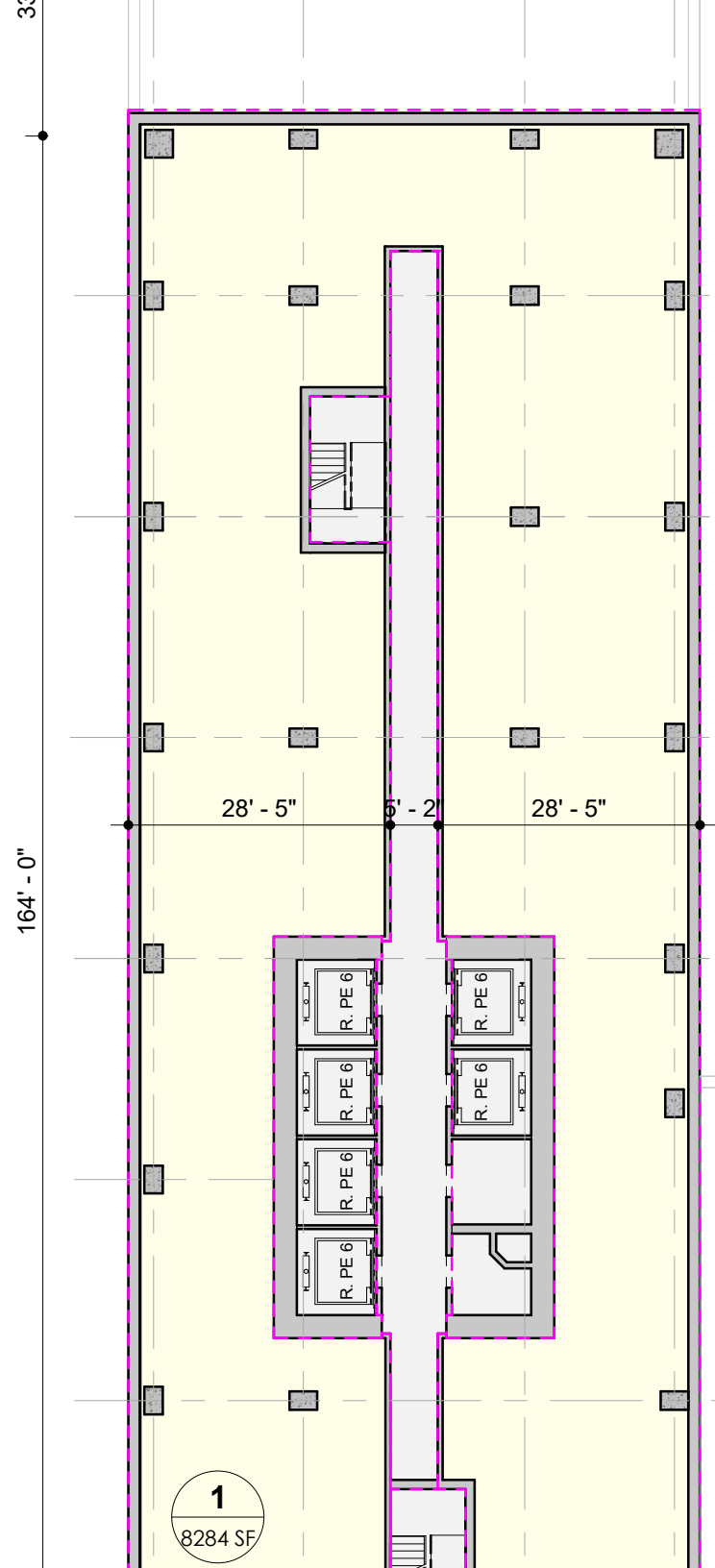
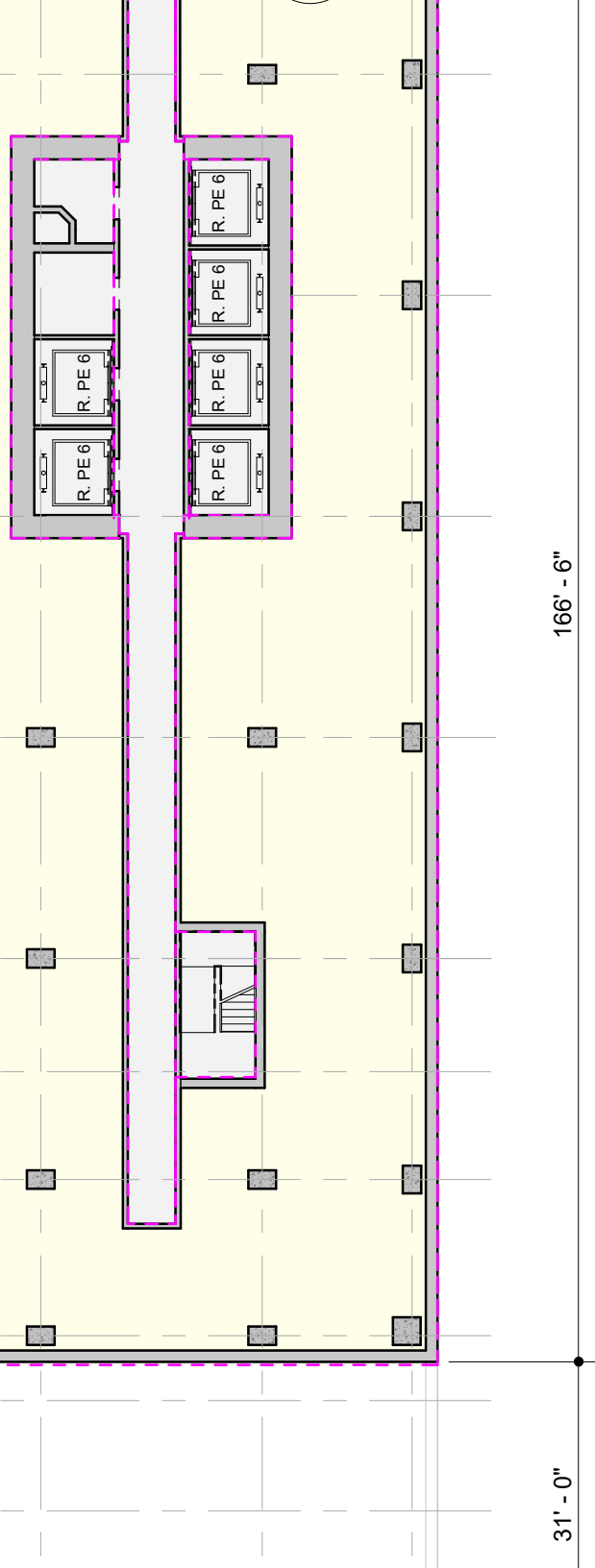
88' - 8"

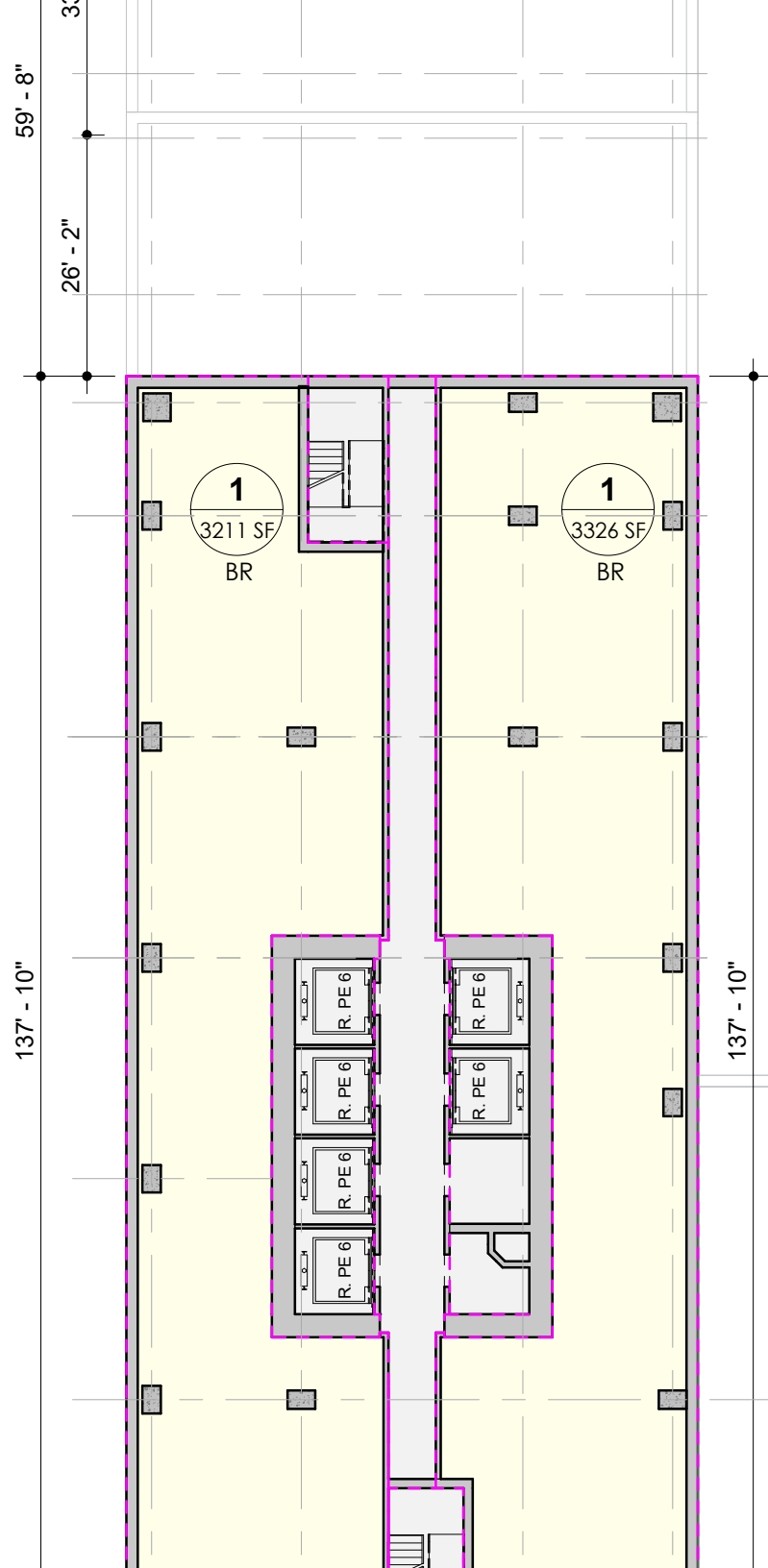
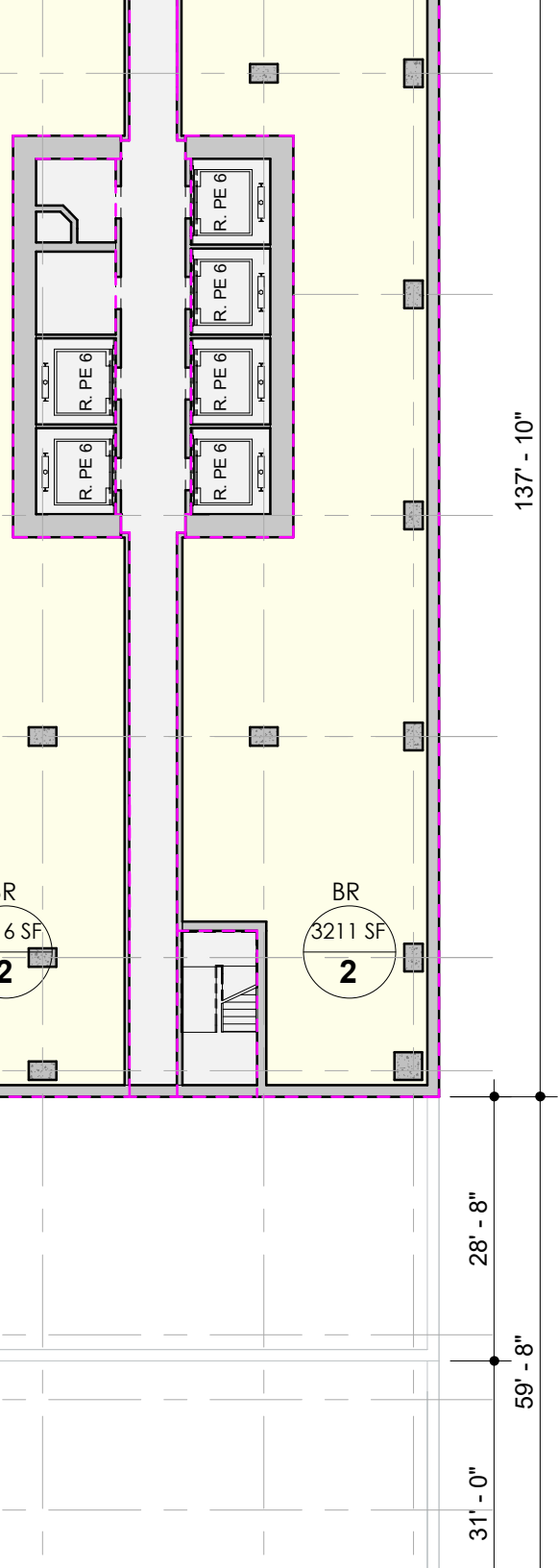
46' - 10"

24' -













**Attachment E:**  
**Rezoning and Non-Rezoning Alternatives – Site Plans**





MPFP

Elliott-Chelsea Houses Site Plan - Non-Rezoning Alternative





**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**RANDY SIMONS**  
Commissioner *Pro Tempore*

October 1, 2024

Taylor Goldman  
Senior Environmental Analyst  
NYCHA  
24-02 49th Ave  
Long Island City, NYC, NY 11101

Re: HUD  
Fulton Elliott-Chelsea Houses PACT  
23PR06218

Dear Taylor Goldman:

Thank you for continuing to consult with the New York State Historic Preservation Office (SHPO). We have reviewed the documentation submitted in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

We have reviewed the Alternatives Analysis document dated September 12<sup>th</sup>, 2024 and the Draft Environmental Impact Statement chapter excerpts that were provided to our office on September 12<sup>th</sup> and 20<sup>th</sup>, 2024. Based upon our review, the SHPO concurs with the determination that there are no prudent and feasible alternatives to the project as proposed, which includes the Adverse Effect of demolition of the State and National Register-Eligible Elliott-Chelsea Houses.

Please continue consultation with Consulting Parties and please also begin development of a Memorandum of Agreement that will include appropriate mitigation stipulations to take into account the effect on the undertaking on historic properties. We would be happy to have a meeting to discuss potential mitigation items.

If you have any questions, feel free to call me at (518)948-2067.

Sincerely,

Olivia Brazee  
Senior Historic Site Restoration Coordinator  
olivia.brazee@parks.ny.gov

cc: CRIS list

via e-mail only

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**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [parks.ny.gov](https://parks.ny.gov)

• 518-237-8643 • <https://parks.ny.gov/shpo> •

## **EXHIBIT F – INVITED CONSULTING PARTIES**

- 1. Delaware Nation**
- 2. Delaware Tribes of Indians**
- 3. Shinnecock Indian Nation**
- 4. Stockbridge Munsee Community**
- 5. Advisory Council on Historic Preservation**
- 6. New York City Landmarks Preservation Commission**
- 7. New York Landmarks Conservancy**
- 8. Historic Districts Council**

## **EXHIBIT G – SHPO HUMAN REMAINS DISCOVERY PROTOCOL**



**State Historic Preservation Office/  
New York State Office of Parks, Recreation and Historic Preservation  
Human Remains Discovery Protocol  
(January 2025)**

If human remains are encountered during construction or archaeological investigations for projects being reviewed under Section 14.09 of the State Historic Preservation Act or Section 106 of the National Historic Preservation Act, the New York State Historic Preservation Office (“SHPO”) recommends that the following protocol be implemented.

- Human remains shall be treated with dignity and respect. Should human remains or suspected human remains be encountered, work in the general area of the discovery shall stop immediately and the location shall be secured and protected from damage and disturbance.
- If skeletal remains are identified and the archaeologist is not able to conclusively determine if they are human, the remains and any associated materials shall be left in place. A qualified forensic anthropologist, bioarchaeologist, or physical anthropologist shall assess the remains in situ to help determine if they are human.
- If the remains are determined to be human, law enforcement, the SHPO, the appropriate Indigenous Nations, and the involved state and federal agencies shall be notified immediately. If law enforcement determines that the burial site is not a criminal matter, no skeletal remains or associated materials shall be removed until appropriate consultation has concluded.
- If human remains are determined to be Indigenous, they shall be left in place and protected from further disturbance until a plan for their avoidance or removal is fully implemented. Please note that avoidance is the preferred option of the SHPO and the Indigenous Nations. The involved agency shall consult SHPO and the appropriate Indigenous Nations to develop a plan of action. Photographs of Indigenous human remains and associated materials should not be taken without consulting with the involved Indigenous Nations.
- If human remains are determined to be non-Indigenous, the remains shall be left in place and protected from further disturbance until a plan for their avoidance or removal is fully implemented. Please note that avoidance is the preferred option of the SHPO. The involved agency shall consult SHPO and other appropriate parties to develop a plan of action.
- The SHPO recommends that burial information is not released to the public to protect burial sites from possible looting.

NOTE: If human remains are encountered outside of a Section 14.09 or Section 106 project, you must follow the procedures of the New York State Unmarked Burial Site Protection Act (<https://nysm.nysed.gov/unmarked-burial-site-protection-act>).

**Appendix D.3**  
**Site Photos of Historic Resources in the Secondary APEs**



1. Buildings on the south side of W. 20th Street midblock between 9th and 10th Avenues in the Chelsea Historic District.



2. View looking east along W. 20th Street from midblock between 9th and 10th Avenues, in the Chelsea Historic District.



3. View looking northeast along W. 20th Street from midblock between 9th and 10th Avenues, in the Chelsea Historic District.



4. View looking south along 9th Avenue from W. 20th Street in the Chelsea Historic District.





5. View looking east along W. 16th Street midblock between 9th and 10th Avenues in the Gansevoort Market Historic District.



6. View looking west along W. 16th Street midblock between 9th and 10th Avenues in the Gansevoort Market Historic District.



7. East side of 9th Avenue between W. 15th and W. 16th Streets in the Gansevoort Market Historic District.



8. 438-440 W. 15th Street between 9th and 10th Avenues in the Gansevoort Market Historic District.





9. View looking east along W. 25th Street towards 10th Avenue and the High Line in the West Chelsea Historic District.



10. View looking west across 10th Avenue at the R.C. Williams Warehouse in the West Chelsea Historic District.



11. View looking southeast along W. 26th Street towards 10th Avenue and the High Line in the West Chelsea Historic District.



12. View looking west along W. 26th Street from midblock between 10th and 11th Avenues in the West Chelsea Historic District.





13. View looking northeast along 9th Avenue from W. 24th Street into Penn South.



14. View looking northeast along 9th Avenue from W. 28th Street at Penn South.



15. View looking east across 9th Avenue at W. 28th Street towards the Church of the Holy Apostles and Penn South high-rise buildings.



16. View looking south across West 28th Street at 9th Avenue towards the Church of the Holy Apostles and Penn South high-rise buildings.





17. View looking west from the High Line on 10th Avenue between W. 17th and W. 18th Streets towards the Merchants Refrigerating Company Warehouse.



18. View looking southwest along W. 18th Street from the High Line at 10th Avenue towards the Merchants Refrigerating Company Warehouse.



19. View looking north from midblock on W. 18th Street between 8th and 9th Avenue towards the Bayard Rustin High School for the Humanities (former Textile High School).



20. View looking west from the intersection between 8th Avenue and W. 16th Street towards the Port of New York Authority and Union Inland Terminal.





21. Eastern facade of the R.C. Williams Warehouse along 10th Avenue between W. 25th and W. 26th Streets.



22. View looking northeast from W. 25th Street just west of 10th Avenue at the R.C. Williams Warehouse and the Elliott-Chelsea Houses.



23. View looking northwest from midblock on W. 24th Street between 9th and 10th Avenues towards the Houses at 437-459 W. 24th Street.



24. View looking northeast from midblock on W. 24th Street between 9th and 10th Avenues towards the Houses at 437-459 W. 24th Street.





25. Western facade of the Church of the Holy Apostles on 9th Avenue between W. 27th and W. 28th Streets.



26. Northern facade of the Church of the Holy Apostles on W. 28th Street just east of 9th Avenue.



27. View looking north east from the intersection between 10th Avenue and W. 23rd Street towards London Terrace.



28. View looking north from W. 23rd Street at the corner of 9th Avenue towards London Terrace.