

Appendix B.1
NYC WRP Consistency Assessment Form

NEW YORK CITY WATERFRONT REVITALIZATION PROGRAM

Consistency Assessment Form

Proposed actions that are subject to CEQR, ULURP or other local, state or federal discretionary review procedures, and that are within New York City's Coastal Zone, must be reviewed and assessed for their consistency with the [New York City Waterfront Revitalization Program](#) (WRP) which has been approved as part of the State's Coastal Management Program.

This form is intended to assist an applicant in certifying that the proposed activity is consistent with the WRP. It should be completed when the local, state, or federal application is prepared. The completed form and accompanying information will be used by the New York State Department of State, the New York City Department of City Planning, or other city or state agencies in their review of the applicant's certification of consistency.

A. APPLICANT INFORMATION

Name of Applicant: New York City Housing Authority, with Elliott Fulton LLC (PACT Partner)

Name of Applicant Representative: Taylor Goldman

Address: 24-02 49th Avenue, Long Island City, NY 11101

Telephone: 718 730 8035 Email: taylor.goldman@nycha.nyc.gov

Project site owner (if different than above): _____

B. PROPOSED ACTIVITY

If more space is needed, include as an attachment.

1. Brief description of activity

Fulton and Elliott-Chelsea Houses Redevelopment Project (the Proposed Project) includes the staged replacement and demolition of existing residential and community facility spaces across NYCHA's Fulton, Elliott, Chelsea, and Chelsea Addition Houses developments in Manhattan (collectively, the Project Sites) as well as the staged development of additional new mixed-use buildings across the Project Sites. The EIS considers seven alternatives for the Proposed Project: the No-Action Alternative, a baseline for comparison of the effects of the other alternatives; four alternatives that are options for the implementation of the Proposed Project, including the Rezoning Alternative, which has been identified as the Preferred Alternative in the FEIS, the Non-Rezoning Alternative, the Midblock Bulk Alternative, and the COY Alternative; and two other alternatives that have been considered but have been determined to be infeasible, including the No Significant Adverse Impacts Alternative and the Rehabilitation and Infill Alternative. Refer to EIS Chapter 02.0 for more information.

2. Purpose of activity

There are two principal purposes that NYCHA and the PACT Partner seek to address with the Proposed Project. One purpose of the Proposed Project is to improve the quality of life and housing stability for existing public housing residents of the Fulton and Elliott-Chelsea Houses through the PACT program. Another purpose of the Proposed Project is 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 financially support the PACT portion of the project. Refer to EIS Chapter 01.0 for more information.

C. PROJECT LOCATION

Borough: Manhattan Tax Block/Lot(s): Refer to EIS Chapter 04.0 (9 tax lots on parts of 4 tax blocks)

Street Address: Refer to EIS Chapter 04.0 (addresses for 22 existing building sites)

Name of water body (if located on the waterfront): Not on the waterfront (950' from Hudson River)

D. REQUIRED ACTIONS OR APPROVALS

Check all that apply.

City Actions/Approvals/Funding

City Planning Commission

☒ Yes ☐ No

- | | | |
|---|--|--|
| <input type="checkbox"/> City Map Amendment | <input type="checkbox"/> Zoning Certification | <input type="checkbox"/> Concession |
| <input checked="" type="checkbox"/> Zoning Map Amendment | <input type="checkbox"/> Zoning Authorizations | <input type="checkbox"/> UDAAP |
| <input checked="" type="checkbox"/> Zoning Text Amendment | <input type="checkbox"/> Acquisition – Real Property | <input type="checkbox"/> Revocable Consent |
| <input type="checkbox"/> Site Selection – Public Facility | <input type="checkbox"/> Disposition – Real Property | <input type="checkbox"/> Franchise |
| <input type="checkbox"/> Housing Plan & Project | <input type="checkbox"/> Other, explain: _____ | |
| <input checked="" type="checkbox"/> Special Permit | | |
- (if appropriate, specify type: ☐ Modification ☐ Renewal ☐ other) Expiration Date: _____

Board of Standards and Appeals ☐ Yes ☒ No

- ☐ Variance (use)
- ☐ Variance (bulk)
- ☐ Special Permit
- (if appropriate, specify type: ☐ Modification ☐ Renewal ☐ other) Expiration Date: _____

Other City Approvals

- | | |
|--|---|
| <input type="checkbox"/> Legislation | <input type="checkbox"/> Funding for Construction, specify: _____ |
| <input type="checkbox"/> Rulemaking | <input type="checkbox"/> Policy or Plan, specify: _____ |
| <input type="checkbox"/> Construction of Public Facilities | <input type="checkbox"/> Funding of Program, specify: _____ |
| <input type="checkbox"/> 384 (b) (4) Approval | <input type="checkbox"/> Permits, specify: _____ |
| <input checked="" type="checkbox"/> Other, explain: <u>Mayoral Zoning Override (potential); refer to EIS Chapter 02.0.</u> | |

State Actions/Approvals/Funding

- ☐ State permit or license, specify Agency: _____ Permit type and number: _____
- ☐ Funding for Construction, specify: _____
- ☐ Funding of a Program, specify: _____
- ☒ Other, explain: NYCHA Board approval (NYCHA is a public benefit corporation chartered under New York State Public Housing Law and a component unit of The City of New York)

Federal Actions/Approvals/Funding

- ☐ Federal permit or license, specify Agency: _____ Permit type and number: _____
- ☐ Funding for Construction, specify: _____
- ☐ Funding of a Program, specify: _____
- ☒ Other, explain: HUD approval (refer to EIS Chapter 01.0)

Is this being reviewed in conjunction with a [Joint Application for Permits?](#) ☐ Yes ☒ No

E.I. LOCATION QUESTIONS

1. Does the project require a waterfront site? ☐ Yes ☒ No
2. Would the action result in a physical alteration to a waterfront site, including land along the shoreline, land under water or coastal waters? ☐ Yes ☒ No
3. Is the project located on publicly owned land or receiving public assistance? ☒ Yes ☐ No
4. Is the project located within a FEMA 1% annual chance floodplain? (6.2) ☐ Yes ☒ No
5. Is the project located within a FEMA 0.2% annual chance floodplain? (6.2) ☒ Yes ☐ No
6. Is the project located adjacent to or within a special area designation? See [Maps – Part III](#) of the NYC WRP. If so, check appropriate boxes below and evaluate policies noted in parentheses as part of WRP Policy Assessment (Section F).
 - ☐ Significant Maritime and Industrial Area (SMIA) (2.1)
 - ☐ Special Natural Waterfront Area (SNWA) (4.1)
 - ☐ Priority Maritime Activity Zone (PMAZ) (3.5)
 - ☐ Recognized Ecological Complex (REC) (4.4)
 - ☐ West Shore Ecologically Sensitive Maritime and Industrial Area (ESMIA) (2.2, 4.2)

F. WRP POLICY ASSESSMENT

Review the project or action for consistency with the WRP policies. For each policy, check Promote, Hinder or Not Applicable (N/A). For more information about consistency review process and determination, see **Part I** of the [NYC Waterfront Revitalization Program](#). When assessing each policy, review the full policy language, including all sub-policies, contained within **Part II** of the WRP. The relevance of each applicable policy may vary depending upon the project type and where it is located (i.e. if it is located within one of the special area designations).

For those policies checked Promote or Hinder, provide a written statement on a separate page that assesses the effects of the proposed activity on the relevant policies or standards. If the project or action promotes a policy, explain how the action would be consistent with the goals of the policy. If it hinders a policy, consideration should be given toward any practical means of altering or modifying the project to eliminate the hindrance. Policies that would be advanced by the project should be balanced against those that would be hindered by the project. If reasonable modifications to eliminate the hindrance are not possible, consideration should be given as to whether the hindrance is of such a degree as to be substantial, and if so, those adverse effects should be mitigated to the extent practicable.

		Promote	Hinder	N/A
I	Support and facilitate commercial and residential redevelopment in areas well-suited to such development.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I.1	Encourage commercial and residential redevelopment in appropriate Coastal Zone areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I.2	Encourage non-industrial development with uses and design features that enliven the waterfront and attract the public.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.3	Encourage redevelopment in the Coastal Zone where public facilities and infrastructure are adequate or will be developed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I.4	In areas adjacent to SMIA's, ensure new residential development maximizes compatibility with existing adjacent maritime and industrial uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
I.5	Integrate consideration of climate change and sea level rise into the planning and design of waterfront residential and commercial development, pursuant to WRP Policy 6.2.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Promote	Hinder	N/A
2	Support water-dependent and industrial uses in New York City coastal areas that are well-suited to their continued operation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.1	Promote water-dependent and industrial uses in Significant Maritime and Industrial Areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.2	Encourage a compatible relationship between working waterfront uses, upland development and natural resources within the Ecologically Sensitive Maritime and Industrial Area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.3	Encourage working waterfront uses at appropriate sites outside the Significant Maritime and Industrial Areas or Ecologically Sensitive Maritime Industrial Area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.4	Provide infrastructure improvements necessary to support working waterfront uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.5	Incorporate consideration of climate change and sea level rise into the planning and design of waterfront industrial development and infrastructure, pursuant to WRP Policy 6.2.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Promote use of New York City's waterways for commercial and recreational boating and water-dependent transportation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.1.	Support and encourage in-water recreational activities in suitable locations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.2	Support and encourage recreational, educational and commercial boating in New York City's maritime centers.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.3	Minimize conflicts between recreational boating and commercial ship operations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.4	Minimize impact of commercial and recreational boating activities on the aquatic environment and surrounding land and water uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.5	In Priority Marine Activity Zones, support the ongoing maintenance of maritime infrastructure for water-dependent uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Protect and restore the quality and function of ecological systems within the New York City coastal area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.1	Protect and restore the ecological quality and component habitats and resources within the Special Natural Waterfront Areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.2	Protect and restore the ecological quality and component habitats and resources within the Ecologically Sensitive Maritime and Industrial Area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.3	Protect designated Significant Coastal Fish and Wildlife Habitats.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.4	Identify, remediate and restore ecological functions within Recognized Ecological Complexes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.5	Protect and restore tidal and freshwater wetlands.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.6	In addition to wetlands, seek opportunities to create a mosaic of habitats with high ecological value and function that provide environmental and societal benefits. Restoration should strive to incorporate multiple habitat characteristics to achieve the greatest ecological benefit at a single location.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.7	Protect vulnerable plant, fish and wildlife species, and rare ecological communities. Design and develop land and water uses to maximize their integration or compatibility with the identified ecological community.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.8	Maintain and protect living aquatic resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Promote	Hinder	N/A
5	Protect and improve water quality in the New York City coastal area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.1	Manage direct or indirect discharges to waterbodies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	Protect the quality of New York City's waters by managing activities that generate nonpoint source pollution.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.3	Protect water quality when excavating or placing fill in navigable waters and in or near marshes, estuaries, tidal marshes, and wetlands.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.4	Protect the quality and quantity of groundwater, streams, and the sources of water for wetlands.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.5	Protect and improve water quality through cost-effective grey-infrastructure and in-water ecological strategies.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Minimize loss of life, structures, infrastructure, and natural resources caused by flooding and erosion, and increase resilience to future conditions created by climate change.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.1	Minimize losses from flooding and erosion by employing non-structural and structural management measures appropriate to the site, the use of the property to be protected, and the surrounding area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in <i>New York City Panel on Climate Change 2015 Report, Chapter 2: Sea Level Rise and Coastal Storms</i>) into the planning and design of projects in the city's Coastal Zone.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	Direct public funding for flood prevention or erosion control measures to those locations where the investment will yield significant public benefit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.4	Protect and preserve non-renewable sources of sand for beach nourishment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7	Minimize environmental degradation and negative impacts on public health from solid waste, toxic pollutants, hazardous materials, and industrial materials that may pose risks to the environment and public health and safety.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.1	Manage solid waste material, hazardous wastes, toxic pollutants, substances hazardous to the environment, and the unenclosed storage of industrial materials to protect public health, control pollution and prevent degradation of coastal ecosystems.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.2	Prevent and remediate discharge of petroleum products.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.3	Transport solid waste and hazardous materials and site solid and hazardous waste facilities in a manner that minimizes potential degradation of coastal resources.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	Provide public access to, from, and along New York City's coastal waters.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.1	Preserve, protect, maintain, and enhance physical, visual and recreational access to the waterfront.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.2	Incorporate public access into new public and private development where compatible with proposed land use and coastal location.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.3	Provide visual access to the waterfront where physically practical.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.4	Preserve and develop waterfront open space and recreation on publicly owned land at suitable locations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

8.5	Preserve the public interest in and use of lands and waters held in public trust by the State and City.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.6	Design waterfront public spaces to encourage the waterfront's identity and encourage stewardship.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9	Protect scenic resources that contribute to the visual quality of the New York City coastal area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.1	Protect and improve visual quality associated with New York City's urban context and the historic and working waterfront.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.2	Protect and enhance scenic values associated with natural resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10	Protect, preserve, and enhance resources significant to the historical, archaeological, architectural, and cultural legacy of the New York City coastal area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.1	Retain and preserve historic resources, and enhance resources significant to the coastal culture of New York City.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.2	Protect and preserve archaeological resources and artifacts.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

G. CERTIFICATION

The applicant or agent must certify that the proposed activity is consistent with New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program. If this certification cannot be made, the proposed activity shall not be undertaken. If this certification can be made, complete this Section.

"The proposed activity complies with New York State's approved Coastal Management Program as expressed in New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program, and will be conducted in a manner consistent with such program."

Applicant/Agent's Name: Philip A. Habib, P.E., Philip Habib & Associates, An AKRF Division

Address: 440 Park Avenue South, New York, NY

Telephone: 212.929.5656

Email: phabib@akrf.com

Applicant/Agent's Signature: _____

Date: 6/27/25

Submission Requirements

For all actions requiring City Planning Commission approval, materials should be submitted to the Department of City Planning.

For local actions not requiring City Planning Commission review, the applicant or agent shall submit materials to the Lead Agency responsible for environmental review. A copy should also be sent to the Department of City Planning.

For State actions or funding, the Lead Agency responsible for environmental review should transmit its WRP consistency assessment to the Department of City Planning.

For Federal direct actions, funding, or permits applications, including Joint Applicants for Permits, the applicant or agent shall also submit a copy of this completed form along with his/her application to the [NYS Department of State Office of Planning and Development](#) and other relevant state and federal agencies. A copy of the application should be provided to the NYC Department of City Planning.

The Department of City Planning is also available for consultation and advisement regarding WRP consistency procedural matters.

New York City Department of City Planning

Waterfront and Open Space Division
120 Broadway, 31st Floor
New York, New York 10271
212-720-3696
wrp@planning.nyc.gov
www.nyc.gov/wrp

New York State Department of State

Office of Planning and Development
Suite 1010
One Commerce Place, 99 Washington Avenue
Albany, New York 12231-0001
518-474-6000
www.dos.ny.gov/opd/programs/consistency

Applicant Checklist

- ☐ Copy of original signed NYC Consistency Assessment Form
- ☐ Attachment with consistency assessment statements for all relevant policies
- ☐ For Joint Applications for Permits, one (1) copy of the complete application package
- ☐ Environmental Review documents
- ☐ Drawings (plans, sections, elevations), surveys, photographs, maps, or other information or materials which would support the certification of consistency and are not included in other documents submitted. All drawings should be clearly labeled and at a scale that is legible.
- ☐ Policy 6.2 Flood Elevation worksheet, if applicable. For guidance on applicability, refer to the WRP Policy 6.2 Guidance document available at www.nyc.gov/wrp

NYC Waterfront Revitalization Program - Policy 6.2 Flood Elevation Worksheet

COMPLETE INSTRUCTIONS ON HOW TO USE THIS WORKSHEET ARE PROVIDED IN THE "CLIMATE CHANGE ADAPTATION GUIDANCE" DOCUMENT AVAILABLE AT www.nyc.gov/wrp

Enter information about the project and site in highlighted cells in Tabs 1-3. Tab 4, "Summary Charts" contains primary results. Tab 5, "0.2%+SLR" produces charts to be used for critical infrastructure or facilities. Tab 6, "Calculations" contains background computations. Appendix A contains tide elevations for station across the city to be used for the elevation of MHHW if a site survey is not available. Non-highlighted cells have been locked.

Background Information	
Project Name	Fulton and Elliott-Chelsea Houses Redevelopment Project (Analysis of Fulton 1 building)
Location	Chelsea neighborhood, Manhattan CD4 (refer to EIS Chapter 04.0, "Analysis Framework," for details)
Type(s)	<div><input checked="" type="checkbox"/> Residential, Commercial, Community Facility</div> <div><input checked="" type="checkbox"/> Parkland, Open Space, and Natural Areas</div> <div><input type="checkbox"/> Tidal Wetland Restoration</div> <div><input type="checkbox"/> Critical Infrastructure or Facility</div> <div><input type="checkbox"/> Industrial Uses</div> <div><input type="checkbox"/> Over-water Structures</div> <div><input type="checkbox"/> Shoreline Structures</div> <div><input type="checkbox"/> Transportation</div> <div><input type="checkbox"/> Wastewater Treatment/Drainage</div> <div><input type="checkbox"/> Coastal Protection</div>
Description	The Proposed Project includes the staged replacement and demolition of existing residential and community facility spaces across NYCHA's Fulton, Elliott, Chelsea, and Chelsea Addition Houses developments in Manhattan (collectively, the Project Sites) as well as the staged development of additional new mixed-use buildings across the Project Sites. Overall, the Project Sites encompass approximately 12.4 acres of land, occupying two separate areas located a quarter-mile apart, consisting of the Fulton Houses (6.0 acres) on portion of four blocks and the Elliott-Chelsea Houses (6.4 acres) on portions of two blocks. (Refer to EIS Chapter 02.0, "Project Alternatives," for details.
Planned Completion Date	2041 (full project); 2028 (first-stage)
Expected Project Lifespan	2099

The New York City Waterfront Revitalization Program Climate Change Adaptation Guidance document was developed by the NYC Department of City Planning. It is a guidance document only and is not intended to serve as a substitute for actual regulations. The City disclaims any liability for errors that may be contained herein and shall not be responsible for any damages, consequential or actual, arising out of or in connection with the use of this information. The City reserves the right to update or correct information in this guidance document at any time and without notice.

For technical assistance on using this worksheet, email wrp@planning.nyc.gov, using the message subject "Policy 6.2 Worksheet."

Last update: Sept. 7, 2018

Establish current tidal and flood heights.

	FT (NAVD88)	Feet	Datum	Source
MHHW	2.28	2.28	NAVD88	<i>NOAA Tides and Current</i>
1% flood height	11.00	11.00	NAVD88	<i>FEMA (nearby 1% flood zone)</i>
Design flood elevation	15.33	15.33	NAVD88	<i>FFRMS (1% flood height + 4'-4")</i>
<i>As relevant:</i>				
0.2% flood height	-->		NAVD88	<i>Not available</i>

Data will be converted based on the following datums:

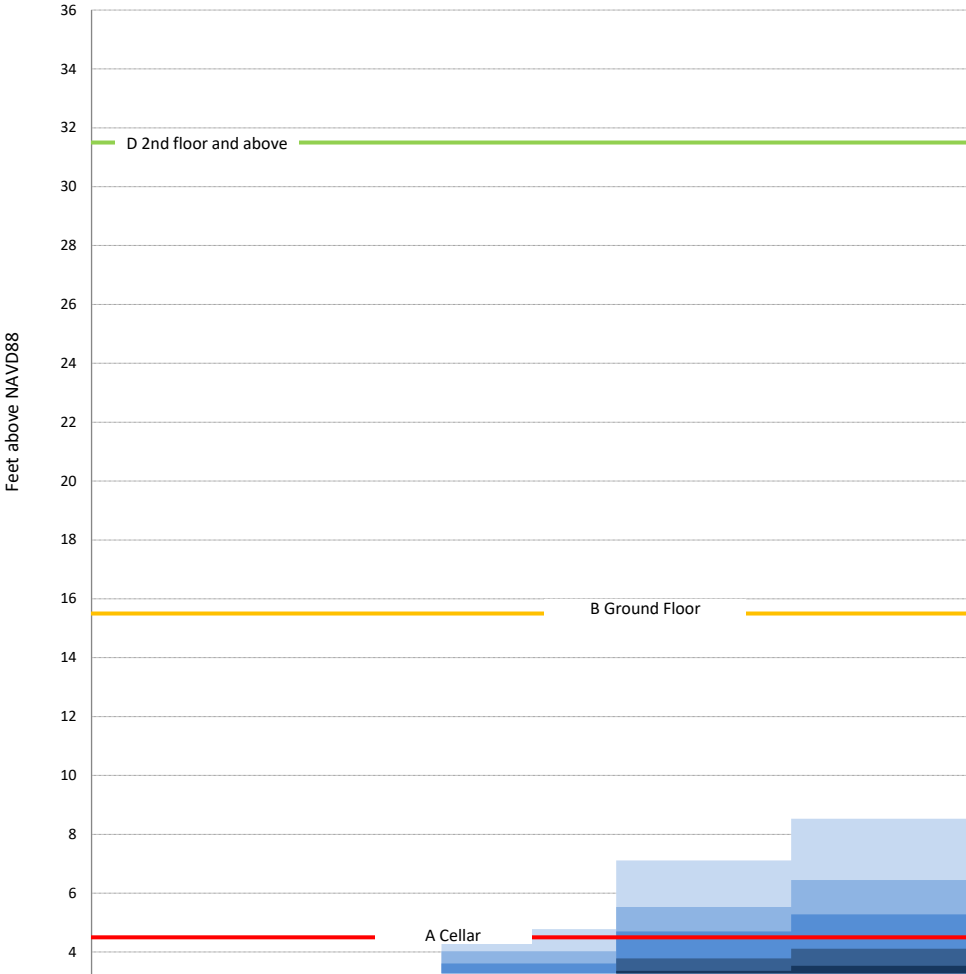
Datum	FT (NAVD88)
NAVD88	<i>0.00</i>
NGVD29	<i>-1.10</i>
Manhattan Datum	<i>1.65</i>
Bronx Datum	<i>1.51</i>
Brooklyn Datum (Sewer)	<i>0.61</i>
Brooklyn Datum (Highway)	<i>1.45</i>
Queens Datum	<i>1.63</i>
Richmond Datum	<i>2.09</i>

Describe key physical features of the project.

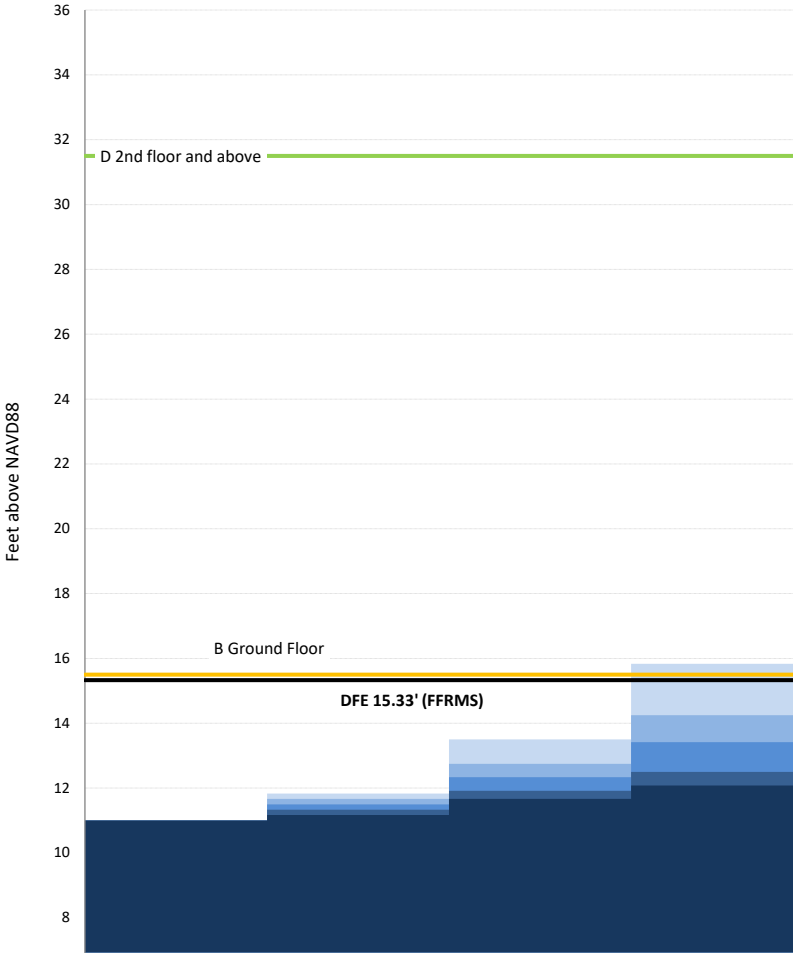
Feature <i>(enter name)</i>	Feature Category	Lifespan	Elevation	Units	Datum	Ft	Ft Above NAVD88	Ft Above MHHW	Ft Above 0.2% flood height
A Cellar	<input checked="" type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other	2099	4.5	Feet	NAVD88	4.5	4.5	2.2	#VALUE!
Residential accessory, electrical roomn									
B Ground Floor	<input checked="" type="checkbox"/> Vulnerable <input checked="" type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other	2099	15.5	Feet	NAVD88	15.5	15.5	13.2	#VALUE!
Residential entry, lobby, and other residential accessory, community facility, commercial, mechanical, back of house, parking									
D 2nd floor and above	<input checked="" type="checkbox"/> Vulnerable <input checked="" type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other	2099	31.5	Feet	NAVD88	31.5	31.5	29.2	#VALUE!
Residential units									
D	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				
E	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				
F	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				
G	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				
H	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				

Assess project vulnerability over a range of sea level rise projections.

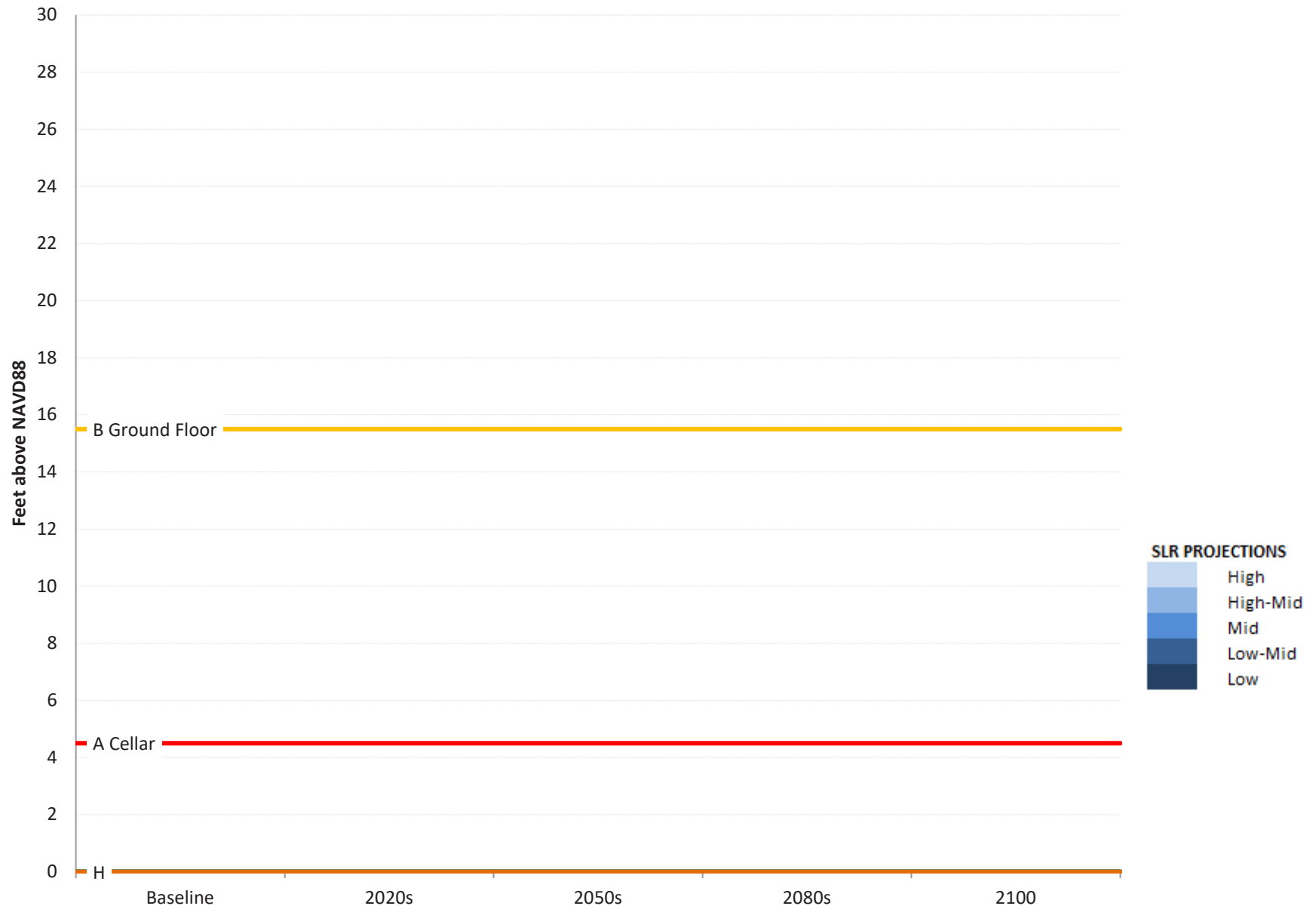
Mean Higher High Water + Sea Level Rise



1% Flood Elevation + Sea Level Rise



0.2% Flood Elevation + Sea Level Rise



		SLR (ft)							SLR (in)				
		Low	Low-Mid	Mid	High-Mid	High			Low	Low-Mid	Mid	High-Mid	High
Baseline		0.00	0.00	0.00	0.00	0.00	2014		0	0	0	0	0
2020s		0.17	0.33	0.50	0.67	0.83	2020s		2	4	6	8	10
2050s		0.67	0.92	1.33	1.75	2.50	2050s		8	11	16	21	30
2080s		1.08	1.50	2.42	3.25	4.83	2080s		13	18	29	39	58
2100		1.25	1.83	3.00	4.17	6.25	2100		15	22	36	50	75

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		MHHW+SLR (ft above NAVD88)				
		Low	Low-Mid	Mid	High-Mid	High
Baseline		2.28	2.28	2.28	2.28	2.28
2020s		2.45	2.61	2.78	2.95	3.11
2050s		2.95	3.20	3.61	4.03	4.78
2080s		3.36	3.78	4.70	5.53	7.11
2100		3.53	4.11	5.28	6.45	8.53

		1%+SLR (ft above NAVD88)				
		Low	Low-Mid	Mid	High-Mid	High
Baseline		11.00	11.00	11.00	11.00	11.00
2020s		11.17	11.33	11.50	11.67	11.83
2050s		11.67	11.92	12.33	12.75	13.50
2080s		12.08	12.50	13.42	14.25	15.83
2100		12.25	12.83	14.00	15.17	17.25

		0.2%+SLR (ft above NAVD88)				
		Low	Low-Mid	Mid	High-Mid	High
Baseline		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2020s		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2050s		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2080s		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2100		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!

	0	1
A Cellar	5	4.5
B Ground Floor	16	15.5
D 2nd floor and above	31.5	31.5
D	0	0
E	0	0
F	0	0
G	0	0
H	0	0
DFE	15.33	15.33

NOAA Tide Station Data

(to be used only when a site survey is unavailable)

Station ID	Station Name	Source MHHW (Feet, NAVD88)*	Adjusted MHHW (Feet, NAVD88)*	Source
8518687	Queensboro Bridge	2.27	2.60	NOAA Tides and Currents
8530095	Alpine	2.11	2.44	NOAA Tides and Currents
8516614	Glen Cove	3.72	4.05	NOAA Tides and Currents
8516990	Willetts Point	3.72	4.05	NOAA Tides and Currents
8518639	Port Morris	3.33	3.66	NOAA Tides and Currents
8518699	Williamsburg Bridge	2.14	2.47	NOAA Tides and Currents
8518750	The Battery	2.28	2.61	NOAA Tides and Currents
8531680	Sandy Hook	2.41	2.74	NOAA Tides and Currents
8518490	New Rochelle	3.71	4.04	NOAA Tides and Currents
8531545	Keyport	2.66	2.99	NOAA Tides and Currents
8516891	Norton Point	2.08	2.41	NOAA VDATUM
8517201	North Channel	2.72	3.05	NOAA Tides and Currents
8517137	Beach Channel	2.10	2.43	NOAA VDATUM
8517756	Kingsborough	2.13	2.46	NOAA VDATUM
8519436	Great Kills	2.22	2.55	NOAA VDATUM
8531142	Port Reading	2.82	3.15	NOAA VDATUM
8519483	Bergen Point	2.56	2.89	NOAA VDATUM
8519050	USCG	2.28	2.61	NOAA Tides and Currents
8518902	Dyckman St	2.01	2.34	NOAA Tides and Currents
8517251	Worlds Fair Marina	3.59	3.92	NOAA VDATUM
8518668	Horns Hook	2.54	2.87	NOAA VDATUM
8518643	Randalls Island	2.60	2.93	NOAA VDATUM
8518526	Throggs Neck	3.68	4.01	NOAA Tides and Currents

* MHHW values include an addition 0.33 feet to account for changes in sea level since the 1983-2001 tidal epoch.



NYC Waterfront Revitalization Program - Policy 6.2 Flood Elevation Worksheet

COMPLETE INSTRUCTIONS ON HOW TO USE THIS WORKSHEET ARE PROVIDED IN THE "CLIMATE CHANGE ADAPTATION GUIDANCE" DOCUMENT AVAILABLE AT www.nyc.gov/wrp

Enter information about the project and site in highlighted cells in Tabs 1-3. Tab 4, "Summary Charts" contains primary results. Tab 5, "0.2%+SLR" produces charts to be used for critical infrastructure or facilities. Tab 6, "Calculations" contains background computations. Appendix A contains tide elevations for station across the city to be used for the elevation of MHHW if a site survey is not available. Non-highlighted cells have been locked.

Background Information	
Project Name	Fulton and Elliott-Chelsea Houses Redevelopment Project (Analysis of Elliott-Chelsea 1 building)
Location	Chelsea neighborhood, Manhattan CD4 (refer to EIS Chapter 04.0, "Analysis Framework," for details)
Type(s)	<div><input checked="" type="checkbox"/> Residential, Commercial, Community Facility</div> <div><input checked="" type="checkbox"/> Parkland, Open Space, and Natural Areas</div> <div><input type="checkbox"/> Tidal Wetland Restoration</div> <div><input type="checkbox"/> Critical Infrastructure or Facility</div> <div><input type="checkbox"/> Industrial Uses</div> <div><input type="checkbox"/> Over-water Structures</div> <div><input type="checkbox"/> Shoreline Structures</div> <div><input type="checkbox"/> Transportation</div> <div><input type="checkbox"/> Wastewater Treatment/Drainage</div> <div><input type="checkbox"/> Coastal Protection</div>
Description	The Proposed Project includes the staged replacement and demolition of existing residential and community facility spaces across NYCHA's Fulton, Elliott, Chelsea, and Chelsea Addition Houses developments in Manhattan (collectively, the Project Sites) as well as the staged development of additional new mixed-use buildings across the Project Sites. Overall, the Project Sites encompass approximately 12.4 acres of land, occupying two separate areas located a quarter-mile apart, consisting of the Fulton Houses (6.0 acres) on portion of four blocks and the Elliott-Chelsea Houses (6.4 acres) on portions of two blocks. (Refer to EIS Chapter 02.0, "Project Alternatives," for details.
Planned Completion Date	2041 (full project); 2028 (first-stage)
Expected Project Lifespan	2080s

The New York City Waterfront Revitalization Program Climate Change Adaptation Guidance document was developed by the NYC Department of City Planning. It is a guidance document only and is not intended to serve as a substitute for actual regulations. The City disclaims any liability for errors that may be contained herein and shall not be responsible for any damages, consequential or actual, arising out of or in connection with the use of this information. The City reserves the right to update or correct information in this guidance document at any time and without notice.

For technical assistance on using this worksheet, email wrp@planning.nyc.gov, using the message subject "Policy 6.2 Worksheet."

Last update: Sept. 7, 2018

Establish current tidal and flood heights.

	FT (NAVD88)	Feet	Datum	Source
MHHW	2.28	2.28	NAVD88	<i>NOAA Tides and Current</i>
1% flood height	11.00	11.00	NAVD88	<i>FEMA (nearby 1% flood zone)</i>
Design flood elevation	15.33	15.33	NAVD88	<i>FFRMS (1% flood height + 4'-4")</i>
<i>As relevant:</i>				
0.2% flood height	-->		NAVD88	<i>Not available</i>

Data will be converted based on the following datums:

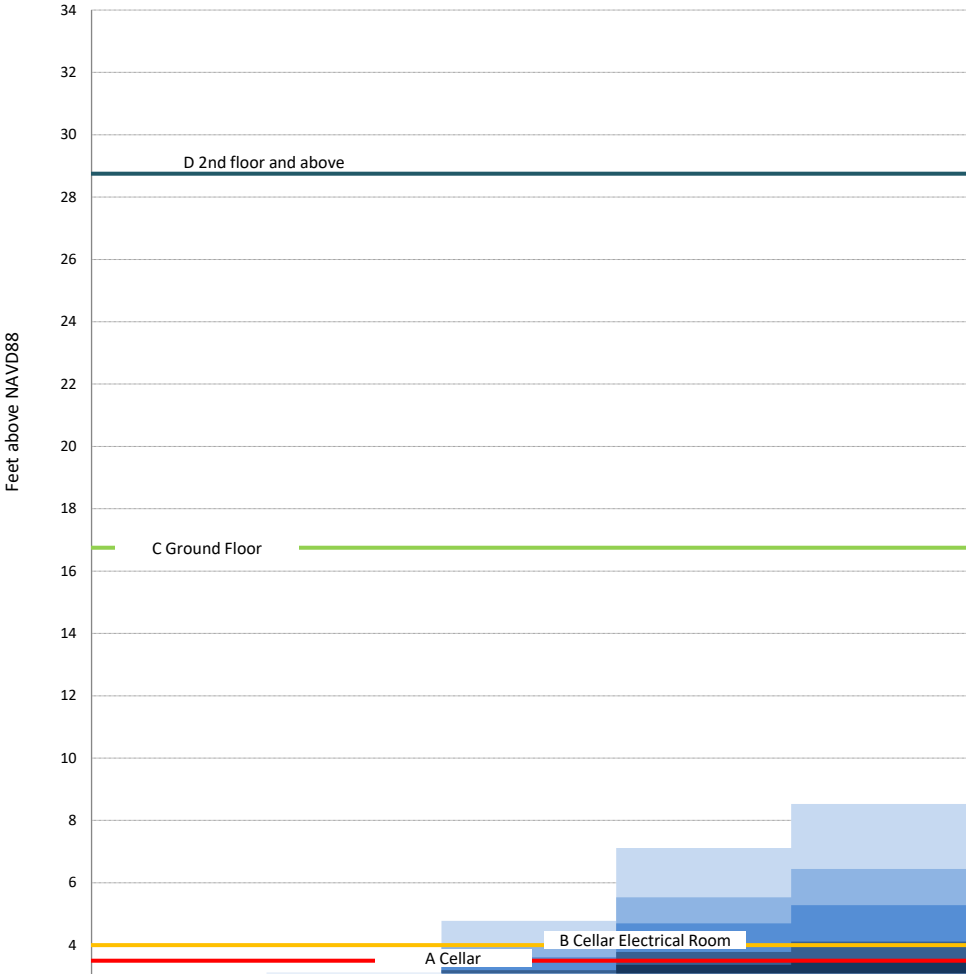
Datum	FT (NAVD88)
NAVD88	<i>0.00</i>
NGVD29	<i>-1.10</i>
Manhattan Datum	<i>1.65</i>
Bronx Datum	<i>1.51</i>
Brooklyn Datum (Sewer)	<i>0.61</i>
Brooklyn Datum (Highway)	<i>1.45</i>
Queens Datum	<i>1.63</i>
Richmond Datum	<i>2.09</i>

Describe key physical features of the project.

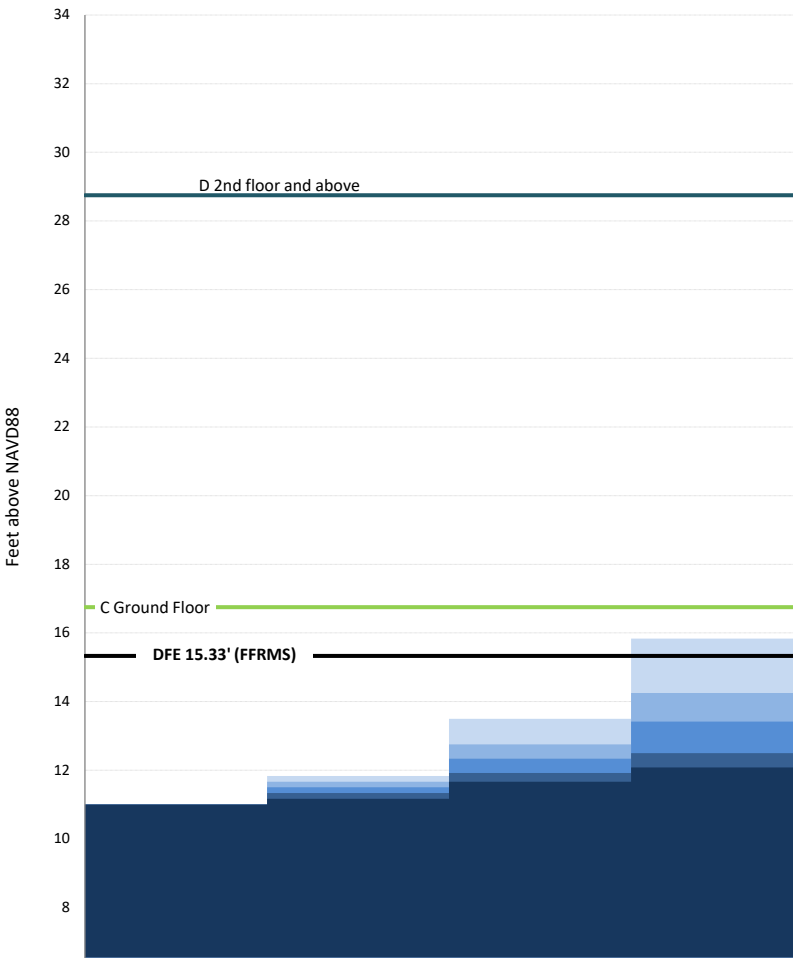
Feature <i>(enter name)</i>	Feature Category	Lifespan	Elevation	Units	Datum	Ft	Ft Above NAVD88	Ft Above MHHW	Ft Above 0.2% flood height
A Cellar	<input checked="" type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other	2099	3.5	Feet	NAVD88	3.5	3.5	1.2	#VALUE!
Community facility, back of house (no critical mechanical infrastructure)									
B Cellar Electrical Room	<input checked="" type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other	2099	4.0	Feet	NAVD88	4.0	4.0	1.7	#VALUE!
Electrical room									
C Ground Floor	<input checked="" type="checkbox"/> Vulnerable <input checked="" type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other	2099	16.8	Feet	NAVD88	16.8	16.8	14.5	#VALUE!
Residential entry, lobby, and other residential accessory, community facility, mechanical, back of house									
D 2nd floor and above	<input checked="" type="checkbox"/> Vulnerable <input checked="" type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other	2099	28.8	Feet	NAVD88	28.8	28.8	26.5	#VALUE!
Community facility, residential accessory, & mechanical (2nd-3rd floors), residential units (4th-39th floors), mechanical (above 39th floor)									
E	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				
F	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				
G	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				
H	<input type="checkbox"/> Vulnerable <input type="checkbox"/> Critical <input type="checkbox"/> Potentially Hazardous <input type="checkbox"/> Other			Feet	NAVD88				

Assess project vulnerability over a range of sea level rise projections.

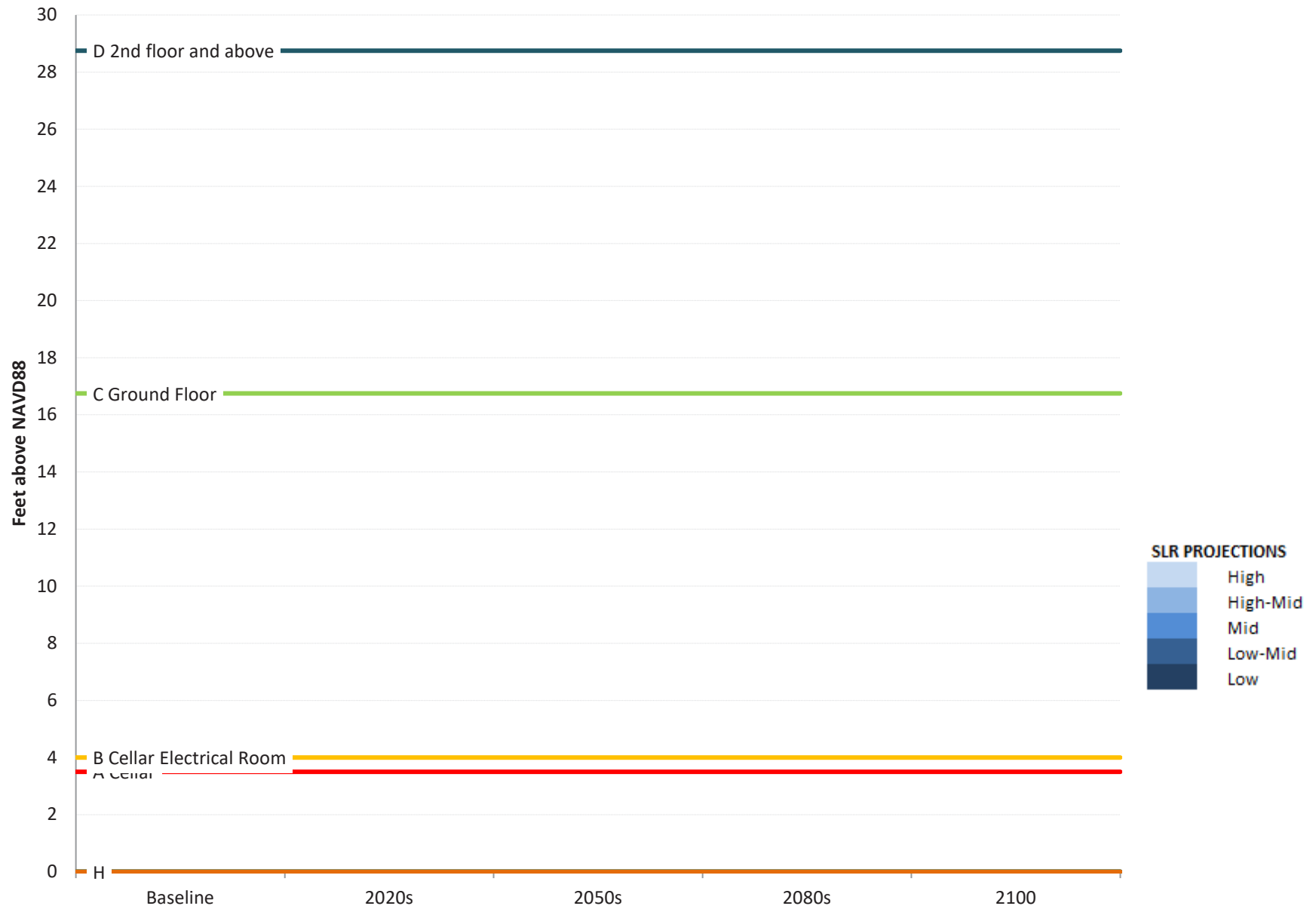
Mean Higher High Water + Sea Level Rise



1% Flood Elevation + Sea Level Rise



0.2% Flood Elevation + Sea Level Rise



	SLR (ft)						SLR (in)				
	Low	Low-Mid	Mid	High-Mid	High		Low	Low-Mid	Mid	High-Mid	High
Baseline		0.00	0.00	0.00	0.00	0.00	2014	0	0	0	0
2020s		0.17	0.33	0.50	0.67	0.83	2020s	2	4	6	8
2050s		0.67	0.92	1.33	1.75	2.50	2050s	8	11	16	21
2080s		1.08	1.50	2.42	3.25	4.83	2080s	13	18	29	39
2100		1.25	1.83	3.00	4.17	6.25	2100	15	22	36	50

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MHHW+SLR (ft above NAVD88)						
	Low	Low-Mid	Mid	High-Mid	High	
Baseline		2.28	2.28	2.28	2.28	2.28
2020s		2.45	2.61	2.78	2.95	3.11
2050s		2.95	3.20	3.61	4.03	4.78
2080s		3.36	3.78	4.70	5.53	7.11
2100		3.53	4.11	5.28	6.45	8.53

1%+SLR (ft above NAVD88)						
	Low	Low-Mid	Mid	High-Mid	High	
Baseline		11.00	11.00	11.00	11.00	11.00
2020s		11.17	11.33	11.50	11.67	11.83
2050s		11.67	11.92	12.33	12.75	13.50
2080s		12.08	12.50	13.42	14.25	15.83
2100		12.25	12.83	14.00	15.17	17.25

0.2%+SLR (ft above NAVD88)						
	Low	Low-Mid	Mid	High-Mid	High	
Baseline		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2020s		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2050s		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2080s		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2100		#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!

	0	1
A Cellar	4	3.5
B Cellar Electrical Room	4	4
C Ground Floor	16.75	16.75
D 2nd floor and above	28.75	28.75
E	0	0
F	0	0
G	0	0
H	0	0
DFE	15.33	15.33

NOAA Tide Station Data

(to be used only when a site survey is unavailable)

Station ID	Station Name	Source MHHW (Feet, NAVD88)*	Adjusted MHHW (Feet, NAVD88)*	Source
8518687	Queensboro Bridge	2.27	2.60	NOAA Tides and Currents
8530095	Alpine	2.11	2.44	NOAA Tides and Currents
8516614	Glen Cove	3.72	4.05	NOAA Tides and Currents
8516990	Willetts Point	3.72	4.05	NOAA Tides and Currents
8518639	Port Morris	3.33	3.66	NOAA Tides and Currents
8518699	Williamsburg Bridge	2.14	2.47	NOAA Tides and Currents
8518750	The Battery	2.28	2.61	NOAA Tides and Currents
8531680	Sandy Hook	2.41	2.74	NOAA Tides and Currents
8518490	New Rochelle	3.71	4.04	NOAA Tides and Currents
8531545	Keyport	2.66	2.99	NOAA Tides and Currents
8516891	Norton Point	2.08	2.41	NOAA VDATUM
8517201	North Channel	2.72	3.05	NOAA Tides and Currents
8517137	Beach Channel	2.10	2.43	NOAA VDATUM
8517756	Kingsborough	2.13	2.46	NOAA VDATUM
8519436	Great Kills	2.22	2.55	NOAA VDATUM
8531142	Port Reading	2.82	3.15	NOAA VDATUM
8519483	Bergen Point	2.56	2.89	NOAA VDATUM
8519050	USCG	2.28	2.61	NOAA Tides and Currents
8518902	Dyckman St	2.01	2.34	NOAA Tides and Currents
8517251	Worlds Fair Marina	3.59	3.92	NOAA VDATUM
8518668	Horns Hook	2.54	2.87	NOAA VDATUM
8518643	Randalls Island	2.60	2.93	NOAA VDATUM
8518526	Throggs Neck	3.68	4.01	NOAA Tides and Currents

* MHHW values include an addition 0.33 feet to account for changes in sea level since the 1983-2001 tidal epoch.



Appendix B.2
8-Step Decision Making Process and Final Notice

Final Notice and Public Explanation of a Proposed Activity in a 500-Year Floodplain

Fulton and Elliott-Chelsea Houses Redevelopment Project Manhattan, NY

June 27, 2025

To: All Interested Agencies, Groups, and Individuals

This is to give notice that the New York City Department of Housing Preservation and Development (HPD), as Responsible Entity and lead agency under the National Environmental Policy Act of 1969 (NEPA) in accordance with 24 Code of Federal Regulations (CFR) Section 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) has determined, under 24 CFR part 58, that the following Proposed Project located in the City and State of New York, on tax lot parcels designated as Block 714, Lot 31, Block 715, Lot 10, Block 716, Lot 17, and Block 717, Lot 19 (collectively “Fulton Houses Project Site”) and Block 723, Lots 1 and 15 and Block 724, Lots 1, 10, and 15 (collectively the “Elliott-Chelsea Houses Project Site”) (together the “Project Sites”) is partially located in the coastal Federal Flood Risk Management Standard (FFRMS) floodplain. The extent of the FFRMS floodplain was determined by using the Federal Flood Standard Support Tool¹, which calculated that the western portion of the Fulton Houses Project Site and the southwestern corner of the Elliott-Chelsea Houses Project Site are located in coastal FFRMS floodplains. Although there is not a detailed survey of the FFRMS floodplain that would allow for an exact calculation of the area of the Project Sites in the FFRMS floodplain, it is estimated to be less than one acre. HPD and NYCHA have identified and evaluated whether there are practicable alternatives to locating the project in the floodplain and the potential impacts on the floodplain from the Proposed Project, as required by Executive Order 11988 as amended by Executive Order 13690 and Executive Order 11990 in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands.

Project Description: The Proposed Project includes the staged demolition and replacement of existing residential and community facility spaces across NYCHA’s Fulton, Elliott, Chelsea, and Chelsea Addition Houses in Manhattan, as well as the staged development of additional new mixed-use buildings across the Project Sites. After more than 60 years of continual use, the buildings and units on the Project Sites have become severely deteriorated and substandard, negatively impacting residents’ quality of life. Since the Project Sites are located over 900 feet inland from the Hudson River within a densely developed urban area, they do not contain any features characteristic of floodplains in closer proximity to coastal areas, such as beaches or waterfront vegetation. The Project Sites do not contain any significant natural features, such as wetlands, that ameliorate flooding conditions or provide other natural beneficial functions.

There are two principal purposes for the Proposed Project: (1) to improve the quality of life and housing stability for existing public housing residents of the Fulton and Elliott-Chelsea Houses through the Permanent Affordability Commitment Together (PACT) program and the Rental Assistance Demonstration (RAD) Program, which together will allow for the disposition of public housing property as authorized under Section 18 of the United States Housing Act of 1937 as amended and implementing regulations at

¹ Executive Order (EO) 14148 and EO 14154, both signed January 20, 2025, revoked EO 14030 which had reinstated EO 13690; therefore EO 13690 was effectively revoked. EO 14030 had included the Federal Flood Standard Support Tool, which is no longer in place as of May 7, 2025. However, at the time the DEIS and Early Notice were prepared, the regulations implementing the FFRMS remained in effect.

24 CFR part 970 (Section 18), and for the conversion of subsidies under Section 9 of the US Housing Act of 1937, 42 USC § 1437g, to project-based vouchers (PBVs) subsidies under Section 8 of the United States Housing Act of 1937, 42 USC § 1437f; and (2) 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 financially support the PACT and new affordable housing components of the Proposed Project. The Proposed Project would also facilitate the development of accessory open space, commercial space, and additional community facility spaces for the benefit of existing and future residents of the Project Sites as well as the surrounding community.

Public Explanation of a Proposed Activity in a 500-Year Floodplain: HPD has considered the following alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values of the floodplain:

In the No-Action Alternative absent the Proposed Project, the Project Sites would remain in their current condition, which includes existing ground-floor residential dwelling units that could be subject to future flooding. Therefore, the No-Action Alternative would not minimize potential harm on the Project Sites. In the Non-Floodplain Alternative in the Surrounding Neighborhood, it was determined that there are no parcels of vacant land in the Chelsea neighborhood of Manhattan that are available to accommodate the scope of new development of the Proposed Project and are owned by NYCHA. Therefore, it would not be feasible to develop the Proposed Project outside of the floodplain whilst accomplishing the purpose and need of the project. In the Non-Floodplain Alternative on the Project Sites, only the portion of the Project Sites outside of the floodplain would be developed. However, this would reduce the number of both affordable and market-rate units, which would negatively affect the feasibility of the project, undermining the Proposed Project's objective of providing more housing. Therefore, this alternative was deemed infeasible as it would not meet the purpose and need of the Proposed Project. The Proposed Project's three alternatives assessed in the DEIS: the Rezoning Alternative, which has been selected as the Preferred Alternative in the FEIS, the Non-Rezoning Alternative, and the Midblock Bulk Alternative – were all determined to meet the purpose and needs of the Proposed Project. Additionally, between the DEIS and FEIS, another alternative, the City of Yes (COY) Alternative, was analyzed. The COY Alternative would also meet the purpose and needs of the Proposed Project. For all of these alternatives discussed within the DEIS and FEIS, the floodplains within and adjacent to the Project Sites are coastal floodplains, which are not affected by the placement of obstructions (e.g., buildings) within the floodplain and therefore the development of the Project Sites would not result in significant adverse impacts to flood levels, flood risk, or the flow of flood waters within the Project Sites or in other nearby portions of the Chelsea neighborhood. Accordingly, no additional mitigation measures are necessary to minimize impacts to the floodplain.

HPD has reevaluated alternatives to locating the Proposed Project in the floodplain and has determined that there is no practicable alternative to locating the Proposed Project in the floodplain while meeting the purpose and need of the Proposed Project. The Proposed Project is important to preserving affordable housing at the Project Sites. Environmental files that document compliance with Steps 3 through 6 of Executive Order 11988, are available in the public review links below.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts

to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

Public Review: This notice is being published concurrently with the Notice of Availability of the Final EIS (FEIS), as permitted by 24 CFR 55.20(b)(1). This reevaluation of practicable alternatives to locate the project within the FFRMS floodplain will be included as an appendix to the FEIS, which may be viewed at HPD's website: <https://www.nyc.gov/site/hpd/services-and-information/environmental-review.page> as well as NYCHA's website: <https://www.nyc.gov/site/nycha/about/pact/chelsea-fulton.page>.

Public Comments on the Proposed Activity within a Floodplain: Comments should be submitted by mail, in the proper format, to be received on or before July 7, 2025, or they will not be considered: HPD, 100 Gold Street, #7-A1, New York, NY 10038, Attention: Anthony Howard or via email at nepa_env@hpd.nyc.gov. If modifications result from public comment, these will be made prior to proceeding with the Proposed Project.

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

**8-Step Decision Process for Executive Orders 11988 and 13690 as provided by 24 CFR
part 55.20¹**

Step 1: Determine whether the proposed action is located in the Federal Flood Risk Management Standard (FFRMS) floodplain or results in new construction that directly impacts an onsite wetland. If the action does not occur in the FFRMS floodplain or include new construction directly impacting an onsite wetland, then no further compliance with this section is required.

Executive Order (EO) 11988, concerning Floodplain Management, mandates that federal activities avoid negatively impacting floodplains and refrain from supporting floodplain development, both directly and indirectly, as much as practicable. The Federal Flood Standard Support Tool assists federal agencies and their partners in determining if a federally funded project is situated within a Federal Flood Risk Management Standard (FFRMS) floodplain. The Federal Flood Standard Support Tool determined that the western portion of the Fulton Houses Project Site and the southwestern corner of the Elliott-Chelsea Houses Project Site are located in coastal FFRMS floodplains. The estimated sea-level rise for these portions of the Project Sites would be two feet in 2050, corresponding to a FFRMS flood elevation of 11 feet North American Vertical Datum of 1988 (NAVD88), and four feet in 2100, with a FFRMS flood elevation of 13 feet NAVD88. NAVD88 is the datum used on Federal Emergency Management Agency (FEMA) Digital Flood Insurance Rate Maps (DFIRMs) for Base Flood Elevations (BFEs).

The Project Sites do not contain any wetlands. Additionally, it should be noted that the Project Sites are not located on the waterfront, but rather are located inland approximately 950 feet from the waterfront at their closest point.

The Proposed Project will provide replacement housing and community spaces for nearly 4,500 NYCHA residents living in over 2,050 DUs, and up to approximately 3,450 additional mixed-income DUs (of which up to 30 percent will be permanently affordable). It includes the staged replacement and demolition of existing residential and community facility spaces across the New York City Housing Authority (NYCHA)'s Fulton, Elliott, Chelsea, and Chelsea Addition Houses (the "Project Sites") in Manhattan, as well as the staged development of additional new mixed-use buildings across the Project Sites. After more than 60 years of continual use, the buildings and units on the Project Sites have become severely deteriorated and substandard, negatively impacting residents' quality of life. In order to effectively address the persistent issues within the buildings, substantial repair, rehabilitation and inconvenience to the residents would be required. The Proposed Project would result in the demolition and complete replacement of the existing NYCHA units for current NYCHA residents, while simultaneously providing additional new permanently affordable and market-rate housing units on the sites. The Proposed Project would also facilitate the development of accessory open space, commercial space, and additional community facility for the benefit of existing and future residents of the Project Sites as well as the surrounding community.

¹ EO 14148 and EO 14154, both signed January 20, 2025, revoked EO 14030 which had reinstated EO 13690; therefore EO 13690 was effectively revoked. EO 14030 had included the Federal Flood Standard Support Tool, which is no longer in place as of May 7, 2025. However, at the time the DEIS, 8-Step, and Early Notice were prepared, the regulations implementing the FFRMS remained in effect.

As the Proposed Project involves federal approvals for redevelopment of the Project Sites, which are partially located in the coastal FFRMS floodplain, Executive Orders 11988 and 13690 apply. The Proposed Project does not meet any of the exceptions at 24 CFR 55.12 or 55.13, and thereby requires an 8-step analysis of the direct and indirect impacts associated with construction, occupancy, and modification in the floodplain. This analysis will consider impacts to the Hudson River floodplain along with concerns for loss of life and property.

Step 2: Notify the public and agencies responsible for floodplain management or wetlands protection at the earliest possible time of a proposal to consider an action in an FFRMS floodplain or wetland and involve the affected and interested public and agencies in the decision-making process.

Pursuant to 24 CFR 55.20(b), a public notice describing the project was published to NYCHA and HPD's website on March 28, 2025 ("Early Notice"). The notice was published on an appropriate government website that is accessible to individuals including those with disabilities and provided meaningful access for individuals with Limited English Proficiency. The notice was published in a total of five languages, including: English, Spanish, Russian, and Traditional and Simplified Chinese. The notice was also sent to interested Federal, State, and local agencies and nonprofit groups. A copy of the published notification is kept in the project's environmental review record and provided in **Appendix I**. A copy was also posted on NYCHA's website. The required 15 calendar days were allowed for public comment. As required by regulation, the notice also included the name, proposed location, and description of the activity, total number of floodplain acres involved, and the responsible entity contact for information (Anthony Howard, Director of Environmental Planning, New York City Department of Housing Preservation and Development) as well as the location and hours of the office at which a full description of the Proposed Project can be viewed.

As portions of the Project Sites are Environmental Justice communities, public comment and decision-making was coordinated with consultation and decision-making under HUD policies implementing 24 CFR Section 58.5(j): Environmental Justice. No comments were received with respect to the Early Notice.

Step 3: Identify and evaluate alternatives to locating the project in the FFRMS floodplain or wetland.

When evaluating alternatives, the practicability of each should be addressed in light of the following three goals: (1) natural values such as topography, habitat, and hazards; (2) social values such as aesthetics, historic and cultural values, land use patterns, and environmental justice; and (3) economic values such as the cost of space, construction, services, relocation, potential property losses from flooding, and cost of flood insurance.

There are two principal purposes for the Proposed Project: (1) to improve the quality of life and housing stability for existing public housing residents of the Fulton and Elliott-Chelsea Houses through the PACT program; and (2) 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 financially support the PACT portion and affordable housing components of the project. The Proposed Project would therefore promote the social values and economic values goals detailed above. The Project Sites do not contain any significant coastal habitats such as wetlands. The avoidance of construction in sensitive habitats and wetlands promotes natural values.

No-Action Alternative

The No-Action Alternative assumes that the Project Sites would remain in their current condition, and no new development would occur on the Project Sites. Additionally, major capital improvements, rehabilitation, or renovations subject to discretionary approvals would not occur. Routine maintenance and repairs would be carried out, but the existing substandard buildings on the Project Sites (some of which are currently located in the identified floodplain) would continue to deteriorate, along with the overall quality of life for existing residents. As such, the No-Action Alternative would not fulfill the purpose and need of the Proposed Project.

Non-Floodplain Alternative in the Surrounding Neighborhood

In this scenario, the Proposed Project would be developed on lots situated entirely outside of the FFRMS floodplain. These lots are within the Chelsea neighborhood of Manhattan, a densely developed mixed-use community with a high demand for affordable and market-rate housing, retail, and community facility amenities, all of which the Proposed Project aims to provide. The Project Sites represent the only available properties owned by NYCHA suitable for this redevelopment. Consequently, it is not feasible to develop the Proposed Project on an alternative site entirely outside of the floodplain.

Non-Floodplain Alternative on the Project Sites

In this scenario, the Proposed Project would be developed entirely on the eastern portions of the Project Sites, outside of the coastal FFRMS floodplain. However, due to the constraints of only developing a portion of the Project Sites in this scenario, the Proposed Project would be smaller with fewer market-rate housing units, and fewer commercial and community facility amenities. In this scenario, the Fulton 4, Fulton 6, and Elliott-Chelsea 4 buildings of the Proposed Project would not be constructed, as they are all partially located in the coastal FFRMS floodplain. This would result in the elimination of 175 affordable units, 407 market-rate units, and 20,130 gross square feet (gsf) of neighborhood center space in Fulton 4; 88 affordable units, 206 market-rate units, and 6,080 gsf of neighborhood center space in Fulton 6; and 136 affordable units, 316 market-rate units, 8,000 gsf of local retail space, and 3,890 gsf of neighborhood center space in Elliott-Chelsea 4.

As detailed in the purpose and need of the Proposed Project, the additional affordable and market-rate units serve to financially support the PACT and affordable housing components of the project. Therefore, reducing the number of both affordable and market-rate units would negatively affect the financial feasibility of the project, undermining the Proposed Project's objective of providing more housing. Moreover, eliminating the amount of commercial and community facility spaces of the Proposed Project is not in keeping with the purpose and need of the project, which includes improving amenities for the existing and future residents of the Project Site as well as the surrounding community. Therefore, it would not be feasible to develop the Proposed Project only on the areas of the Project Sites located outside of the floodplain and meet the purpose and need of the Proposed Project.

Proposed Project – Rezoning Alternative

Under the Rezoning Alternative, the Proposed Project would be constructed on the entirety of the Project Sites, including the areas within the coastal FFRMS floodplains. The Rezoning Alternative would provide replacement housing and community spaces for nearly 4,500 NYCHA residents living in over 2,050 new Section 8 DUs, and up to approximately 3,450 additional mixed-income DUs (of which up to 30 percent will be permanently affordable). The Proposed Project would result in the demolition and complete

replacement of the existing NYCHA units for current NYCHA residents, while simultaneously providing additional new permanently affordable and market-rate housing units on the sites. The Proposed Project would also facilitate the development of accessory open space, commercial space, and additional community facility for the benefit of existing and future residents of the Project Sites as well as the surrounding community. As the largest development, the Rezoning Alternative would meet the purpose and need of the Proposed Project detailed above. It should be noted that the Rezoning Alternative has been identified in the FEIS as the Preferred Alternative for the Proposed Project.

Moreover, under the Rezoning Alternative, the Proposed Project will be designed and constructed to meet stringent sustainability targets, focusing on achieving high performance outcomes across key areas of sustainability including energy and water efficiency, operational and embodied carbon emissions reductions, indoor health and wellness, and resiliency. The Proposed Project will pursue Enterprise Green Communities certification using the NYC Overlay, Energy Star for Multifamily New Construction, and be designed to meet NYC Local Law 97 carbon emissions limits in 2050. In addition, the Proposed Project will explore the feasibility of pursuing higher performance standards such as Enterprise Green Communities

Proposed Project – Non-Rezoning Alternative

Under the Non-Rezoning Alternative, similar to the Rezoning Alternative, the Proposed Project would be constructed on the entirety of the Project Sites, including the areas within the coastal FFRMS floodplains. The Non-Rezoning Alternative would provide replacement housing and community spaces for nearly 4,500 NYCHA residents living in over 2,050 new Section 8 DUs, and up to 1,783 additional mixed-income DUs (of which up to 30 percent will be permanently affordable). The Proposed Project would result in the demolition and complete replacement of the existing NYCHA units for current NYCHA residents, while simultaneously providing additional new permanently affordable and market-rate housing units on the sites. The Proposed Project would also facilitate the development of accessory open space, commercial space, and additional community facility for the benefit of existing and future residents of the Project Sites as well as the surrounding community.

Proposed Project – Midblock Bulk Alternative

Under the Midblock Bulk Alternative, similar to the Rezoning Alternative, the Proposed Project would be constructed on the entirety of the Project Sites, including the areas within the coastal FFRMS floodplains. Like the Rezoning Alternative, the Midblock Bulk Alternative would provide replacement housing and community spaces for nearly 4,500 NYCHA residents living in over 2,050 new Section 8 DUs, and up to approximately 3,450 additional mixed-income DUs (of which up to 30 percent will be permanently affordable). The Proposed Project would result in the demolition and complete replacement of the existing NYCHA units for current NYCHA residents, while simultaneously providing additional new permanently affordable and market-rate housing units on the sites. The Proposed Project would also facilitate the development of accessory open space, commercial space, and additional community facility for the benefit of existing and future residents of the Project Sites as well as the surrounding community.

Proposed Project – City of Yes (COY) Alternative

Since the publication of the DEIS, the PACT Partner has confirmed that a COY Alternative developed pursuant to recently adopted COY zoning text amendments may be feasible for the Project Sites.

Under the COY Alternative, similar to the Rezoning Alternative, the Proposed Project would be constructed on the entirety of the Project Sites, including the areas within the coastal FFRMS floodplains. Like the Rezoning Alternative, the COY Alternative would provide replacement housing and community

spaces for nearly 4,500 NYCHA residents living in over 2,050 new Section 8 DUs, and up to approximately 1,509 additional mixed-income DUs (of which up to 30 percent will be permanently affordable). The Proposed Project would result in the demolition and complete replacement of the existing NYCHA units for current NYCHA residents, while simultaneously providing additional new permanently affordable and market-rate housing units on the sites. The Proposed Project would also facilitate the development of accessory open space, commercial space, and additional community facility for the benefit of existing and future residents of the Project Sites as well as the surrounding community.

Step 4: Identify and evaluate the potential direct and indirect impacts associated with the occupancy or modification of the FFRMS floodplain or the wetland and the potential direct and indirect support of floodplain and wetland development that could result from the proposed action, including impacts related to future climate-related flood levels, sea level rise, and the related increased value of beneficial floodplain and wetland functions.

As detailed in 24 CFR Section 55.20(d)(1), identification of areas with the Project Sites that are subject to flood risks are required. Specifically, these include: (1) floodplain characteristics; (2) impacts to live and property; and (3) impacts to natural and beneficial values.

Locating the Proposed Project on the Project Sites would not result in any significant negative direct or indirect impacts on the floodplain. The Project Sites do not contain any significant natural features, such as wetlands, that ameliorate flooding conditions, and as the sites are located over 900 feet to the east of the Hudson River within a densely developed urban area, they do not contain any features characteristic of floodplains in closer proximity to coastal areas, such as beaches or waterfront vegetation.

The proposed buildings, all of which would be mixed-use, would feature non-residential uses (i.e. commercial and community facility spaces) on the ground floors, with residential floors above, and would be located on sites that are currently developed with structures and parking lots that are over 900 feet to the east of the Hudson River. The Proposed Project would improve living and property conditions on the Project Sites through the elevation of the residential uses on the sites.

The Proposed Project would not result in any negative impacts to natural or beneficial values of the floodplain, such as water resources, living resources, or agricultural resources, as the Project Sites do not contain any of these features. The Proposed Project would involve the demolition of the State/National Register of Historic Places (S/NR)-eligible Elliott-Chelsea Houses, which is a cultural resource partially located in the FFRMS floodplain. However, this resource is not a defining feature of the waterfront, as it is located over 900 feet to the east of the Hudson River in a densely developed urban area.

Coastal floodplains are influenced by astronomic tide and meteorological forces and not by fluvial (river) flooding, and as such are not affected by the placement of obstructions within the floodplain. Therefore, the construction and operation of the Proposed Project in the coastal FFRMS floodplain would not exacerbate future projected flooding conditions as compared to the future without the Proposed Project. The Proposed Project would not result in significant adverse impacts to the waterfront.

Step 5: Where practicable, design or modify the proposed action to minimize the potential adverse impacts to and from the FFRMS floodplain or wetland and to restore and preserve their natural and beneficial functions and values.

As detailed in *Climate Change at NYCHA: A Plan to Adapt*, NYCHA's goals and objectives focus on installing sustainable and resilient infrastructure, protecting mechanical, electrical, and plumbing systems, and reinforcing building structures to withstand adverse conditions. NYCHA also prioritizes engaging the community throughout a project to ensure their needs and feedback are integrated. NYCHA's strategies are shaped by past lessons, aiming to create a robust and prepared environment for all involved. These goals and objectives have been incorporated into the design and implementation of the Proposed Project.

Elevation

The Proposed Project involves the development of mixed-use buildings with non-residential uses (i.e., commercial, community facility spaces, and some mechanical spaces) on the ground floors, and residential dwelling units above. Per NYC policies for residential developments subject to public funding or approvals, the Design Flood Elevation (DFE) for the Proposed Project's first-stage buildings (new Fulton 1 building and new Elliott-Chelsea 1 building) is set at +15.33 feet NAVD88. This DFE is based on the existing BFE for the closest 100-year floodplain to the Project Sites is +11 NAVD88 with an additional 4 feet, 4 inches added to the existing BFE to determine the DFE. As the methodology for defining the DFE, federal regulations, local laws, and/or the best-available actionable data is likely to change in the coming years, the DFE for buildings in later development stages is not identified herein. However, the later-stage buildings would be constructed to meet, at a minimum, the DFE requirements applicable at the time of their construction.

As discussed above, coastal floodplains are influenced by astronomic tide and meteorological forces and not by fluvial (river) flooding, and as such are not affected by the placement of obstructions within the floodplain. Therefore, the construction and operation of the Proposed Project in the coastal FFRMS floodplain would not exacerbate future projected flooding conditions as compared to the future without the Proposed Project. Moreover, it should be emphasized that only a portion of the Project Sites are located in the FFRMS floodplain; the remainder of the sites are not within FFRMS floodplains, and therefore, are not expected to experience major flooding events in the future.

Minimization

As detailed above, the Project Sites are located over 900 feet to the east of the Hudson River, and are currently developed with buildings and parking lots. They do not contain any significant natural features of floodplains, such as wetlands. Therefore, the Proposed Project would not have the potential to harm natural or beneficial values of the floodplains. Additionally, as detailed below, the Proposed Project would be designed to minimize potential harm to residents and occupants of the Project Sites during potential future flooding events.

Restoration and Preservation

There is no opportunity to restore or preserve natural or beneficial values of the floodplain on the sites, which are already fully developed and located within the densely developed neighborhood of Chelsea in Manhattan.

Planning for Resident and Occupant Safety

Potential consequences to ground-floor retail and community facility spaces that may in the future be subject to flooding on the Project Sites include: flood damage to property, building structure, loss of inventory, potentially increased flood insurance costs, and/or need to relocate to a higher elevation. This

is in contrast to existing conditions (and the No-Action Alternative), where some of the current buildings on the Project Sites contain ground-floor residential dwelling units that could in the future be subject to flooding. Therefore, the Proposed Project would minimize harm by locating all residential dwelling units and most mechanical equipment above the ground-floor of the proposed buildings. Moreover, the PACT Partner will be required to obtain flood insurance for the Project Sites in the future with the Proposed Project. The flood insurance requirement for the life of the property will be monitored by NYCHA by listing the agency as an interested party on the 2nd mortgagee/other box of the flood insurance application and by placing a covenant on the property that lasts for the useful life of the structure.

Step 6: Reevaluate the proposed action to determine (1) Whether it is still practicable in light of its exposure to flood hazards in the floodplain, the extent to which it will aggravate the current East Side Coastal Resiliency Project EIS hazards to other floodplains, and its potential to disrupt floodplain values; and (2) Whether alternatives preliminarily rejected at Step 3 of this section are practicable in light of the information gained in Steps 4 and 5.

The Responsible Entity shall consider the totality of the previous steps and the criteria in this section to make a decision as to whether to approve, approve with modifications, or reject a proposed project. Adverse impacts to floodplains and wetlands must be avoided if there is a practicable alternative. This analysis must consider: (1) whether the project is still practicable in light of exposure to flood hazards in the floodplain or wetland, possible adverse impacts on the floodplain or wetland, the extent to which it will aggravate the current hazards to other floodplains or wetlands, and the potential to disrupt the natural and beneficial functions and values of floodplains or wetlands; and (2) whether alternatives preliminarily rejected in Step 3 are practicable in light of information gained in Steps 4 and 5.

No-Action Alternative

The No-Action Alternative assumes that the Project Sites would remain in their current condition, which as detailed above, includes existing ground-floor residential dwelling units that could be subject to future flooding. Therefore, the No-Action Alternative would not minimize potential harm on the Project Sites.

Non-Floodplain Alternative in the Surrounding Neighborhood

As detailed above, there are no parcels of vacant land in the Chelsea neighborhood of Manhattan that are available to accommodate the scope of new development of the Proposed Project and are owned by NYCHA. Therefore, it would not be feasible to develop the Proposed Project outside of the floodplain whilst accomplishing the purpose and need of the project.

Non-Floodplain Alternative on the Project Sites

As discussed above, due to the constraints of only developing a portion of the Project Sites in this scenario, the Proposed Project would be smaller with fewer affordable and market-rate housing units, and retail and community facility amenities. This scenario would result in the elimination of a total of 1,328 DUs, 30,100 gsf of neighborhood center space, and 8,000 gsf of local retail space (175 affordable units, 407 market-rate units, and 20,130 gross square feet (gsf) of neighborhood center space in Fulton 4; 88 affordable units, 206 market-rate units, and 6,080 gsf of neighborhood center space in Fulton 6; and 136 affordable units, 316 market-rate units, 8,000 gsf of local retail space, and 3,890 gsf of neighborhood center space in Elliott-Chelsea 4) as compared to the Rezoning Alternative.

As detailed in the purpose and need of the Proposed Project, the additional affordable and market-rate units serve to financially support the PACT and affordable housing components of the project. Therefore, reducing the number of both affordable and market-rate units would negatively affect the financial feasibility of the project, undermining the Proposed Project's objective of providing more housing. Moreover, eliminating the amount of retail and community facility spaces of the Proposed Project is not in keeping with the purpose and need of the project, which includes improving amenities for the existing and future residents of the Project Site as well as the surrounding community. Therefore, it would not be feasible to develop the Proposed Project only on the areas of the Project Sites located outside of the floodplain and meet the purpose and need of the Proposed Project.

Proposed Project – Rezoning Alternative

As detailed above, the Rezoning Alternative would meet the purpose and needs of the Proposed Project.

Proposed Project – Non-Rezoning Alternative

Similar to the Rezoning Alternative, the Non-Rezoning Alternative would meet the purpose and needs of the Proposed Project.

Proposed Project – Midblock Bulk Alternative

Similar to the Rezoning Alternative, the Midblock Bulk Alternative would meet the purpose and needs of the Proposed Project.

Proposed Project – COY Alternative

In addition, the COY Alternative would also meet the purpose and needs of the Proposed Project.

For all of these alternatives, the floodplains within and adjacent to the Project Sites are coastal floodplains, and would not be affected by the placement of obstructions (e.g., buildings) on the Project Sites within the floodplain. Therefore, the development of the Project Sites would not result in significant adverse impacts to flood levels, flood risk, or the flow of flood waters within the Project Sites or in other nearby portions of the Chelsea neighborhood. Accordingly, no mitigation measures are necessary to minimize impacts to the floodplain.

Conclusion

It is NYCHA's determination that there is no practical alternative for partially locating the Proposed Project in the flood zone. The Proposed Project would result in the replacement of existing public housing units and redress existing sub-standard housing conditions, while also creating new permanently affordable and market-rate housing options on the NYCHA-owned Project Sites. Moreover, the Proposed Project would facilitate the development of accessory open spaces for building tenants, as well as commercial space and additional community facility for the benefit of existing and future residents of the Project Sites as well as the surrounding community. The Proposed Project would not result in direct or indirect negative impacts with regard to lives, property, or the natural values of the floodplain, but would rather elevate all existing residential units and some mechanical equipment on the Project Sites. Accordingly, the Proposed Project would reduce historical and environmental disparities related to flood risk in a community with environmental justice concerns and would minimize the potential for harm in future flood conditions as compared to existing conditions (and the No-Action Alternative).

Step 7: If the reevaluation results in a determination that there is no practicable alternative to locating the proposal in the floodplain, publish a final notice.

The reevaluation resulted in a determination that there is no practicable alternative to locating the Proposed Project in the floodplain while meeting the purpose and need of the Proposed Project; however, the Proposed Project will not be within or adjacent to wetlands. Furthermore, the Proposed Project is important to preserving affordable housing at the Project Sites. A final notice will be published on NYCHA and HPD's website in the same fashion as the early floodplain notice and will provide for a minimum public comment period of at least 7 calendar days as required.

Step 8: Upon completion of the decision making process in Steps 1 through 7, implement the proposed action. There is a continuing responsibility to ensure that the mitigating measures identified in Step 7 are implemented.

Although no mitigation measures are proposed, NYCHA and the PACT partner will assure that the Proposed Project, as described above, is executed, and that necessary language will be included in all agreements with participating parties with respect to building elevations and other elements designed to avoid impacts. NYCHA will also take an active role in monitoring the construction process to ensure compliance with all applicable federal laws, executive orders, and regulations, as well as state and local laws, regulations, codes and standards prior to and throughout project construction. Further, the flood insurance requirement for the life of the property will be monitored by NYCHA by listing the agency as an interested party on the 2nd mortgagee/other box of the flood insurance application and by placing a covenant on the property that lasts for the useful life of the structure.

Subject to the reasonable commercial availability of such insurance during the construction phase of the Proposed Project:

NYCHA shall require flood insurance limits in excess of the National Flood Insurance Program (NFIP) maximum mutually acceptable to NYCHA and the PACT Partner for the duration of the 99-year ground lease (where NYCHA is landlord and PACT Partner is tenant).

NYCHA's current flood insurance program, which also features limits in excess of the NFIP maximum shall continue to be in force on an excess and contingent basis provided such coverage.

In the event of termination of the ground lease, NYCHA shall place (or re-place) primary flood insurance on the project consistent with the above.

Early Notice and Public Review of a Proposed Activity in a 500-Year Floodplain

To: All Interested Agencies, Groups, and Individuals,

This is to give notice that the New York City Department of Housing Preservation and Development (HPD), as Responsible Entity and lead agency under the National Environmental Policy Act of 1969 (NEPA) in accordance with 24 Code of Federal Regulations (CFR) Section 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) has determined, under 24 CFR part 58, that the following Proposed Project located in the City and State of New York, on tax lot parcels designated as Block 714, Lot 31, Block 715, Lot 10, Block 716, Lot 17, and Block 717, Lot 19 (collectively “Fulton Houses Project Site”); and Block 723, Lots 1 and 15 and Block 724, Lots 1, 10, and 15 (collectively the “Elliott-Chelsea Houses Project Site”) (together the “Project Sites”), is partially located in the coastal Federal Flood Risk Management Standard (FFRMS) floodplain. The extent of the FFRMS floodplain was determined by using the Federal Flood Standard Support Tool, which calculated that the western portion of the Fulton Houses Project Site and the southwestern corner of the Elliott-Chelsea Houses Project Site are located in coastal FFRMS floodplains. Although there is not a detailed survey of the FFRMS floodplain that would allow for an exact calculation of the area of the Project Sites in the FFRMS floodplain, it is estimated to be less than one acre. Therefore, HPD and NYCHA will be identifying and evaluating whether there are practicable alternatives to locating the project in the floodplain and the potential impacts on the floodplain from the Proposed Project, as required by Executive Order 11988 as amended by Executive Order 13690 and Executive Order 11990 in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands.

The Proposed Project includes the staged demolition and replacement of existing residential and community facility spaces across NYCHA’s Fulton, Elliott, Chelsea, and Chelsea Addition Houses in Manhattan, as well as the staged development of additional new mixed-use buildings across the Project Sites. After more than 60 years of continual use, the buildings and units on the Project Sites have become severely deteriorated and substandard, negatively impacting residents’ quality of life. Since the Project Sites are located over 900 feet inland from the Hudson River within a densely developed urban area, they do not contain any features characteristic of floodplains in closer proximity to coastal areas, such as beaches or waterfront vegetation. The Project Sites do not contain any significant natural features, such as wetlands, that ameliorate flooding conditions or provide other natural beneficial functions.

There are two principal purposes for the Proposed Project: (1) to improve the quality of life and housing stability for existing public housing residents of the Fulton and Elliott-Chelsea Houses through the Permanent Affordability Commitment Together (PACT) program and the Rental Assistance Demonstration (RAD) Program, which together will allow for the 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 for the conversion of subsidies under Section 9 of the US Housing Act of 1937, 42 USC § 1437g, to project-based vouchers (PBVs) subsidies under Section 8 of the United States Housing Act of 1937, 42 USC § 1437f; and (2) 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 financially support the PACT and new affordable housing components of the Proposed Project. The Proposed Project would also facilitate the development of accessory open space, commercial space, and additional community facility spaces for the benefit of existing and future residents of the Project Sites as well as the surrounding community.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the floodplain, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

This notice is being published concurrently with the Notice of Availability of Draft Environmental Impact Statement, as permitted by 24 CFR 55.20(b)(1). The initial evaluation of practicable alternatives to locate the project within the FFRMS floodplain will be included as an appendix to the Draft Environmental Impact Statement (DEIS), which may be viewed at HPD's website: <https://www.nyc.gov/site/hpd/services-and-information/environmental-review.page> as well as NYCHA's website: <https://www.nyc.gov/site/nycha/about/pact/chelsea-fulton.page>. Written comments on this notice, the evaluation, and the DEIS must be received by HPD at the following address on or before May 12, 2025:

Department of Housing Preservation ATTN: Anthony Howard
100 Gold Street, #7-A3
New York, NY 10038
212-863-7248

Hours of Operation: 9 AM – 5 PM, Monday through Friday, except Federal and State Holidays

or via email at nepa_env@hpd.nyc.gov. The minimum 15-calendar-day comment period for this notice pursuant to 24 CFR 55.20(b)(2) is being extended to run concurrently with the DEIS Comment Period, which will run for 45 days after publication.

Date: March 28, 2025