

Fulton and Elliott Chelsea Houses Redevelopment Project

Chapter 09.0: Response to Comments on the Draft Environmental Impact Statement¹

A. INTRODUCTION

The Final Environmental Impact Statement (FEIS) is a comprehensive document which incorporates comments received on the Draft Environmental Impact Statement (DEIS) for the Fulton and Elliott-Chelsea Houses Redevelopment Project (the “Proposed Project”), which was issued on March 28, 2025. This chapter summarizes and responds to comments on the DEIS. Oral and written comments on the DEIS were received during three public hearings held by the New York City Housing Authority (NYCHA) and the New York City Department of Housing Preservation and Development (HPD) on April 23, 2025 at Fulton Houses, April 24, 2025 at Elliott-Chelsea Houses, and May 8, 2025 (online).² Written comments on the DEIS were accepted through the close of the public comment period, which ended on May 19, 2025. **Appendix K** of the FEIS contains the written comments received on the DEIS and transcripts of the public meetings.

The FEIS was issued on June 27, 2025, incorporating comments received on the DEIS where relevant and appropriate, as well as other background and project updates that were made subsequent to publication of the DEIS.

Section B lists the elected officials, organizations, and individuals that provided relevant comments on the DEIS. Section C contains a summary of and a response to comments relating to the identification of issues to be addressed in the FEIS. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the DEIS.

B. LIST OF COMMENTERS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Agencies and Elected Officials

1. Mark Austin, Environmental Reviews and Strategic Programs Section, U.S. Environmental Protection Agency, written submission dated May 19, 2025 (Austin_434)³
2. Erik Bottcher, New York City Council, written submissions dated May 19, 2025 (Bottcher et al_077, Bottcher_428)
3. Jessica Chait, Chair, Manhattan Community Board 4, written submission dated May 19, 2025 (CB4_078)
4. Brad Hoylman-Sigal, New York State Senate, written submission dated May 19, 2025 (Bottcher et al_077)

¹ This chapter is new to the FEIS.

² The online (Zoom) public hearing was originally scheduled for Wednesday, April 16, 2025. Due to a nation-wide Zoom outage that day, that hearing was re-scheduled and held as indicated above. Related to this, the public comment period, originally scheduled to end on Monday, May 12, was extended by one week to Monday May, 19, 2025.

³ Parenthetical notes are for tracking purposes only.

5. Mark Levine, Manhattan Borough President, written submission dated May 19, 2025 (Bottcher et al_077)
6. Gregg Morris, Chair, Chelsea Land Use Committee, Manhattan Community Board 4, written submission dated May 19, 2025 (CB4_078)
7. Jerrold Nadler, U.S. House of Representatives, written submission dated May 19, 2025 (Bottcher et al_077)
8. Tony Simone, New York State Assembly, written submission dated May 19, 2025 (Bottcher et al_077)

Organizations and Businesses

9. Michele Campo, Bowery Alliance of Neighbors, written submission dated May 13, 2025 (Campo_315)
10. LeeAnn Caso, Hudson Guild, written submission dated May 19, 2025 (Caso_266)
11. Tom Fox, Co-chair, Waterfront Committee, City Club of New York, written submission dated May 19, 2025 (Fox_431)
12. Olive Freud, President, Committee for Environmentally Sound Development, written submission dated May 18, 2025 (Freud_334)
13. Leslie Gersing, Downtown Women for Change, written submission dated May 15, 2025 (Gersing_269)
14. Mrs. Bisi Ideraabdullah, Executive Director, Imani House, Inc. written submission dated May 9, 2025 (Ideraabdullah_325)
15. Ken Jockers, Executive Director, The Hudson Guild, written submission dated May 12, 2025 (Jockers_433)
16. Rene Keitt, President Elliott-Chelsea Houses Resident Association, oral comments delivered April 24, 2025 (Keitt_072)
17. Alex MacDougall, Legal Aid Society written submission dated May 19, 2025 (Newman et al_260)
18. MSCC, Midtown South Community Council (MSCC), written submissions dated May 1, 2025 (MSCC_435) and May 19, 2025 (MSCC_432)
19. John Mudd, Midtown Community Council, oral comments delivered April 23, 2025 (Mudd_045) and written submission dated May 19, 2025 (Mudd_430)
20. Lucy Newman, Legal Aid Society, written submission dated May 19, 2025 (Newman et al_260)
21. Joe Restuccia, Clinton Housing, oral comments delivered April 24, 2025 (Restuccia_071)
22. Michelle Spinner, Vice President, London Terrace Tenants Association, written submissions dated May 12, 2025 (Spinner_318) and oral comments delivered April 24, 2025 (Spinner_051)

General Public

23. Miguel Acevedo, oral comments delivered April 24, 2025 (Acavedo_436) and May 8, 2025 (Acavedo_437)
24. ackerperson, written submission dated May 9, 2025 (ackerperson_084)
25. Kathleen Adams, written submission dated May 8, 2025 (Adams_255)
26. Margarita Aguilar, written submission dated May 15, 2025 (Aguilar_294)
27. Diane Alexander, written submission dated May 8, 2025 (Alexander_201)
28. Evan Lloyd Alboum, written submission dated May 16, 2025 (Alboum_179)
29. Samuel Alexander, oral comments delivered May 8, 2025 (Alexander_438)
30. Mari Alvarez, written submission dated April 21, 2025 (Alvarez_014)
31. Penelope Anderson, oral comments delivered April 24, 2025 (Anderson_439)
32. Tosh Anderson, written submission dated May 18, 2025 (Anderson_408)

33. Lydia Andre, oral comments delivered April 24, 2025 (Andre_056) and written submission dated May 19, 2025 (Andre_286)
34. Karen Andrews, written submission dated May 17, 2025 (Andrews_243)
35. Mauren Antkowsky, written submission dated May 10, 2025 (Antkowsky_305)
36. Joyce Bialik, written submission dated May 10, 2025 (Bialik_235)
37. Maggie Block, written submission dated May 16, 2025 (Block_290)
38. Françoise Astorg Bollack, written submission dated May 1, 2025 (Bollack_189)
39. Sam Bradway, written submission dated May 1, 2025 (Bradway_368)
40. Viren Brahmabhatt, written submission dated April 30, 2025 (Brahmbhatt_416)
41. Andrea Brecker, written submission dated May 19, 2025 (Brecker_100)
42. Emma Brock, written submission dated April 29, 2025 (Brock_005)
43. Alan M. Brown, written submission dated May 7, 2025 (Brown_085)
44. Lance Jay Brown, written submission dated May 16, 2025 (Brown_259)
45. Jane Buchanan, oral comments delivered April 24, 2025 (Buchanan_070) and May 8, 2025 (Buchanan_440)
46. David J. Burney, written submission dated May 12, 2025 (Burney_272)
47. Charles Byrne, written submission dated May 10, 2025 (Byrne_136)
48. Dr. Caitlin Cahill, oral comments delivered April 24, 2025 (Cahill_074) and May 19, 2025 (Cahill_271)
49. Kathleen Cahill, written submission dated May 4, 2025 (Cahill_256)
50. Octavia M. Campbell, written submissions dated April 14, 2025 (Campbell_002), April 23, 2025 (Campbell_079), May 3, 2025 (Campbell_333), and May 13, 2025 (Campbell_332)
51. Kelly Carroll, written submission dated May 10, 2025 (Carroll_258)
52. Betsy Carton, written submission dated May 9, 2025 (Carton_113)
53. Lisa Caswell, written submission dated May 9, 2025 (Caswell_277)
54. Mary C. Citarella, written submission dated April 24, 2025 (Citarella_010) and May 15, 2025 (Citarella_300)
55. Septima Poinsette Clark, written submission dated May 5, 2025 (Clark_380)
56. Faith Cohen, written submission dated May 14, 2025 (Cohen_184)
57. Florence Cohen, written submission dated May 16, 2025 (Cohen_186)
58. Joseph S. Cohen, written submission dated May 18, 2025 (Cohen_232)
59. Lizette Colon, oral comments delivered April 23, 2025 (Colon_038) and May 19, 2025 (Colon_280)
60. James Connolly, written submission dated May 16, 2025 (Connolly_211)
61. Edrie Cote, written submissions dated May 13, 2025 (Cote_169)
62. Alexa Cruz, written submission dated May 14, 2025 (Cruz_087)
63. Alixa Cruz, oral comments delivered April 24, 2025 (Cruz_441) and delivered May 8, 2025 (Cruz_442), written submissions dated May 2, 2025 (Cruz_094), May 13, 2025 (Cruz_093), and May 19, 2025 (Cruz_086, Cruz_092)
64. Judith Dahill, written submission dated May 2, 2025 (Dahill_236)
65. Amy Davidow, written submission dated May 18, 2025 (Davidow_098)
66. Carmen Decena, written submission dated May 19, 2025 (Decena_122)
67. Edwin Delgadel, oral comments delivered April 24, 2025 (Delgadel_059)
68. Tito Delgado, oral comments delivered April 23, 2025 (Delgado_033)
69. Margarita Denec, oral comments delivered April 24, 2025 (Denec_060)
70. Sam Deutsch, written submission dated May 1, 2025 (Deutsch_369)
71. Jimmy Diaz, written submission dated April 28, 2025 (Diaz_006)
72. Jennifer Dreussi, written submission dated May 19, 2025 (Dreussi_220)
73. Patrice Duffy-Jacobson, written submission dated May 16, 2025 (Duffy-Jacobson_338)
74. Skirtle Michael Durst, oral comments delivered April 23, 2025 (Durst_443)
75. Marena Erdogan, written submission dated May 15, 2025 (Erdogan_293)

76. Yayi F., written submissions dated May 18, 2025 (F_425, F_426)
77. Kathleen Fallon, written submission dated May 11, 2025 (Fallon_257)
78. Rachel Federman, written submission dated May 2, 2025 (Federman_349)
79. Meryl Feigenberg, written submission dated May 9, 2025 (Feigenberg_312)
80. Erica Feld, written submissions dated May 8, 2025 (Feld_177) and May 16, 2025 (Feld_176)
81. Miriam Mimi Fischer, written submission dated May 15, 2025 (Fischer_323)
82. Miriam Fisher, written submission dated May 4, 2025 (Fisher_324)
83. Leda Fisher, written submission dated May 12, 2025 (Fisher_265)
84. Page Flanigan, written submission dated May 16, 2025 (Flanigan_337)
85. Harold S. Forsythe, written submission dated May 10, 2025 (Forsythe_203)
86. Gail Fox, written submission dated April 27, 2025 (Fox_007)
87. Michelle Gadsden, oral comments delivered April 24, 2025 (Gadsden_050)
88. Rosemary Garcia, oral comments delivered May 8, 2025 (Garcia_444)
89. Roberta Gelb, oral comments delivered April 23, 2025 (Gelb_030), April 24, 2025 (Gelb_058), May 8, 2025 (Gelb_445), and May 19, 2025 (Gelb_363)
90. Jennifer Geller, written submission dated May 19, 2025 (Geller_221)
91. William Gillen, written submission dated May 16, 2025 (Gillen_421)
92. Karen Gisonny, written submission dated May 15, 2025 (Gisonny_244)
93. Lynne Glasner, written submission dated May 18, 2025 (Glasner_287)
94. David Golab, written submission dated May 14, 2025 (Golab_151)
95. Michelle Gomez, written submission dated May 1, 2025 (Gomez_317)
96. Karen Greenberg, written submission dated May 15, 2025 (Greenberg_245)
97. Daniel Gross, written submission dated May 12, 2025 (Gross_147)
98. Tracy Gross, written submission dated May 13, 2025 (Gross_409)
99. Jane Gullong, written submission dated May 2, 2025 (Gullong_212)
100. Allison Guttu, written submission dated May 14, 2025 (Guttu_095)
101. Radaheims Guzman, oral comments delivered April 23, 2025 (Guzman_046)
102. Radaheims Guzman, oral comments delivered April 24, 2025 (Guzman_446)
103. Marni Halasa, oral comments delivered April 23, 2025 (Halasa_027), April 24, 2025 (Halasa_075), and May 8, 2025 (Halasa_447)
104. Dr. Avishai Halev, written submission dated May 1, 2025 (Halev_110)
105. Dave Haloka, oral comments delivered April 23, 2025 (Haloka_448)
106. Patricia Hartwell, written submission dated May 2, 2025 (Hartwell_339)
107. Judy Harvest, oral comments delivered April 24, 2025 (Harvest_449)
108. Francine Haselkorn, oral comments delivered April 23, 2025 (Haselkorn_025), April 24, 2025 (Haselkorn_047), and May 19, 2025 (Haselkorn_187).
109. Gavin Healy, oral comments delivered April 24, 2025 (Healy_049)
110. Noah Heau, written submission dated May 15, 2025 (Heau_331)
111. Candice Hewitt, oral comments delivered April 24, 2025 (Hewitt_450)
112. Victoria Hillstom, written submission dated May 2, 2025 (Hillstom_413)
113. Julie K. Hodorowski, written submission dated May 2, 2025 (Hodorowski_240)
114. David Holowka, oral comments delivered April 23, 2025 (Holowka_024), April 24, 2025 (Holowka_451), and May 8, 2025 (Holowka_452); written submission dated May 19, 2025 (Holowka_429)
115. Matthew Housley, written submission dated May 2, 2025 (Housley_302)
116. Kara Huberman, written submission dated May 18, 2025 (Huberman_242)
117. Valerie Hughes, oral comments delivered April 23, 2025 (Hughes_017, Hughes_453)
118. Ivona Hunte, oral comments delivered April 24, 2025 (Hunte_064)
119. Florence Dent Hunter, oral comments delivered April 24, 2025 (Hunter_454)
120. Lisa Ighomuaye, oral comments delivered April 24, 2025 (Ighomuaye_052)
121. Susan Immergut, written submission dated May 2, 2025 (Immergut_394)

122. Rita Jendrzewski, written submission dated May 10, 2025 (Jendrzewski_360)
123. Mary Jones, oral comments delivered April 23, 2025 (Jones_021)
124. Deborah Kane, written submission dated May 13, 2025 (Kane_157)
125. Josh Karan, written submission dated May 18, 2025 (Karan_233)
126. Samuel Kephlian, oral comments delivered April 24, 2025 (Kephlian_065)
127. Rene Keitt, oral comments delivered May 8, 2025 (Keitt_455)
128. Matthew Kilgore, written submission dated May 16, 2025 (Kilgore_303)
129. Renee Kites, oral comments delivered April 23, 2025 (Kites_044)
130. Carol Kover, written submission dated May 15, 2025 (Kover_125)
131. Bennett Kremen, oral comments delivered April 23, 2025 (Kremen_020)
132. Jacqueline Lara, oral comments delivered April 23, 2025 (Lara_041) and May 8, 2025 (Lara_456)
133. Jackie Lara, written submission dated May 18, 2025 (Lara_210)
134. Samir Lavingia, written submission dated May 1, 2025 (Lavingia_371)
135. Layla Law-Gisiko, oral comments delivered April 23, 2025 (Law-Gisiko_037), April 24, 2025 (Law-Gisiko_457), and written submission dated May 19, 2025 (Law-Gisiko_081)
136. Ashley Lawson, oral comments delivered April 24, 2025 (Lawson_062)
137. Burt Lazaran, oral comments delivered April 24, 2025 (Lazaran_054)
138. Shui Lee, written submission dated April 19, 2025 (Lee_015)
139. Tsee Lee, oral comments delivered April 24, 2025 (Lee_063)
140. Gordon Lee, written submission dated May 19, 2025 (Lee_202)
141. Jeffrey LeFrancois, written submission dated May 2, 2025 (LeFrancois_217)
142. Dr. Judith Lerner, written submission dated May 18, 2025 (Lerner_237)
143. Donna Lewis, written submission dated April 13, 2025 (Lewis_001)
144. Ralph Lewis, written submission dated May 13, 2025 (Lewis_351)
145. Ihenriquezny, written submission dated May 7, 2025 (Ihenriquezny_273)
146. Joan Lilly, written submission dated May 18, 2025 (Lilly_226)
147. Mini Liu, written submission dated May 18, 2025 (Liu_322)
148. Mary Lopez, written submission dated May 19, 2025 (Lopez_289)
149. Yan Lu, written submission dated May 19, 2025 (Lu_424)
150. Milagros Lugo, oral comments delivered May 8, 2025 (Lugo_458) and written submission dated May 19, 2025 (Lugo_321)
151. Thomas G Lunke, written submission dated May 5, 2025 (Lunke_076)
152. Miguel Marrero, written submission dated May 19, 2025 (Marrero_320)
153. Sandra Marsh, written submission dated May 15, 2025 (Marsh_374)
154. Gladys Martinez, oral comments delivered April 23, 2025 (Martinez_042)
155. Angelica Martinez, written submission dated May 16, 2025 (Martinez_104)
156. Alicia Martinez, written submission dated May 19, 2025 (Martinez_091)
157. Melissa McIntyre, written submission dated May 17, 2025 (McIntyre_311)
158. Leslie McKenzie, written submission dated May 15, 2025 (McKenzie_270)
159. Paula McKinnon, written submission dated May 3, 2025 (McKinnon_340)
160. Jocelyn Meinhardt, written submissions dated April 27, 2025 (Meinhardt_008) and May 15, 2025 (Meinhardt_228)
161. Joan Mellon, written submission dated May 16, 2025 (Mellon_227)
162. Dan Miller, written submission dated May 1, 2025 (Miller_146)
163. Tonya Mills, written submission dated May 19, 2025 (Mills_407)
164. Mortin Minsle, oral comments delivered April 24, 2025 (Minsle_067)
165. Celines Miranda, oral comments delivered April 23, 2025 (Miranda_035) April 24, 2025 (Miranda_061), and May 8, 2025 (Miranda_485)
166. Norma Miranda, undated written submission (Miranda_004)
167. Julian Molesso, written submission dated May 18, 2025 (Molesso_239)
168. Barbara Montalvo, oral comments delivered May 8, 2025 (Montalvo_459)

169. Janette Montalvo, written submission dated May 19, 2025 (Montalvo_213)
170. Cornelia Moore, oral comments delivered April 24, 2025 (Moore_073)
171. Mattie Moore, oral comments delivered May 8, 2025 (Moore_460)
172. Johann Moore-Goldring, written submission dated May 15, 2025 (Moore-Goldring_229)
173. Lisa Morgan, written submission dated May 18, 2025 (Morgan_279)
174. Scotto Mycklebust, oral comments delivered April 23, 2025 (Mycklebust_026) and April 24, 2025 (Mycklebust_053)
175. Dr. Chris Nickell, written submission dated May 19, 2025 (Nickell_138)
176. Kathy Nizzari, oral comments delivered April 23, 2025 (Nizzari_016)
177. Mike Noble, oral comments delivered May 8, 2025 (Noble_461)
178. Sammy O, written submission dated May 16, 2025 (O_372)
179. Jose Ocasio, written submission dated May 19, 2025 (Ocasio_230)
180. Irene O'Connell, oral comments delivered May 8, 2025 (O'Connell_462)
181. Lynne Oddo, written submissions dated April 25, 2025 (Oddo_009) and May 4, 2025 (Oddo_288)
182. Susan Ortega, oral comments delivered April 23, 2025 (Ortega_040)
183. Maria Ortiz, oral comments delivered April 23, 2025 (Ortiz_463), April 24, 2025 (Ortiz_068), and May 8, 2025 (Ortiz_464)
184. Samantha Ortiz, written submission dated May 16, 2025 (Ortiz_370)
185. Carol J. Ott, written submission dated April 14, 2025 (Ott_080) and oral comments delivered April 23, 2025 (Ott_023) and April 24, 2025 (Ott_465)
186. Nicole Palmer, written submission dated May 16, 2025 (Palmer_328)
187. Katherine Paulsen, oral comments delivered April 24, 2025 (Paulsen_466)
188. Lorri Paulucci, written submission dated May 10, 2025 (Paulucci_282)
189. Alexis Perez, oral comments delivered May 8, 2025 (Perez_467)
190. Ann Pettibone, written submission dated May 16, 2025 (Pettibone_105)
191. phyllis814, written submission dated May 18, 2025 (phyllis814_346)
192. Justine Pippitt-Zagolin, written submission dated May 13, 2025 (Pippitt-Zagolin_241)
193. Matthew Pitta, written submission dated May 13, 2025 (Pitta_304)
194. Leonard Polletta, oral comments delivered April 23, 2025 (Polletta_031) and May 8, 2025 (Polletta_468)
195. Daisy Quinonez, oral comments delivered April 24, 2025 (Quinonez_469)
196. Daniel Ramirez, oral comments delivered April 23, 2025 (Ramirez_036)
197. Rosalie Regal, written submission dated May 14, 2025 (Regal_364)
198. Tomas Reyer, written submission dated May 19, 2025 (Reyer_405)
199. Andrew Reyes, written submission dated May 19, 2025 (Reyes_103)
200. Gary Riotto, written submission dated May 5, 2025 (Riotto_197) and oral comments delivered May 8, 2025 (Riotto_470)
201. Sonya Rivera, oral comments delivered April 23, 2025 (Rivera_032)
202. Carmen Rivera, oral comments delivered April 24, 2025 (Rivera_471)
203. Matthew Robinson, oral comments delivered April 23, 2025 (Robinson_018), April 24, 2025 (Robinson_055), and May 8, 2025 (Robinson_472); written submission dated May 19, 2025 (Robinson_082)
204. Roberto Rodriguez, oral comments delivered April 23, 2025 (Rodriguez_043)
205. Dr. Nancy Romer, written submission dated May 9, 2025 (Romer_326)
206. Mooney Rosado, oral comments delivered April 23, 2025 (Rosado_473)
207. Lourdes Rosario, written submissions dated April 23, 2025 (Rosario_012) and May 8, 2025 (Rosario_283)
208. Sonia Rosario, written submission dated May 19, 2025 (Rosario_384)
209. Barbara Rosenfeld, oral comments delivered April 23, 2025 (Rosenfeld_028)
210. Cathy Santore, written submission dated May 13, 2025 (Santore_132)
211. Naomi Scher, written submission dated May 10, 2025 (Scher_327)

- 212. Laura Schoen, written submission dated May 18, 2025 (Schoen_262)
- 213. Janice Serrano, written submission dated May 9, 2025 (Serrano_214)
- 214. Phyllis Shanley, oral comments delivered April 24, 2025 (Shanley_048) and written submissions dated May 4, 2025 (Shanley_345), May 13, 2025 (Shanley_344), May 14, 2025 (Shanley_343), and May 18, 2025 (Shanley_342)
- 215. Jayesh Sheth, written submission dated May 19, 2025 (Sheth_215)
- 216. Victoria Shorr, written submission dated May 9, 2025 (Shorr_415)
- 217. Bonnie Sims, oral comments delivered May 8, 2025 (Sims_474)
- 218. Josh Sippen, written submission dated May 13, 2025 (Sippen_234)
- 219. David Sloss, written submissions dated May 5, 2025 (Sloss_152, Sloss_153)
- 220. Carlos Solana, written submission dated May 15, 2025 (Solana_121)
- 221. Wendy Solem, written submissions dated May 14, 2025 (Solem_419, Solem_420)
- 222. Dr. MaryAnn Sorensen-Allacci, written submission dated May 17, 2025 (Sorensen-Allacci_301)
- 223. Olive Karen Stamm, written submissions dated May 1, 2025 (Stamm_335) and May 13, 2025 (Stamm_246)
- 224. Jean Standish, written submission dated May 13, 2025 (Standish_216)
- 225. Henrietta Stern, written submission dated May 1, 2025 (Stern_207)
- 226. Jill Stern, written submission dated May 15, 2025 (Stern_224)
- 227. Diana Stewart, oral comments delivered April 24, 2025 (Stewart_475)
- 228. Penelope Stothers, written submission dated May 18, 2025 (Stothers_341)
- 229. maya suess, written submission dated May 19, 2025 (suess_306)
- 230. Mingxi Iris Sun, written submission dated May 19, 2025 (Sun_209)
- 231. Colette Swietnicki, written submission dated May 14, 2025 (Swietnicki_142)
- 232. Rebecca Taub, written submission dated May 1, 2025 (Taub_352)
- 233. Karin Taylor, written submission dated May 9, 2025 (Taylor_247)
- 234. Yamila Tomas, written submission dated May 19, 2025 (Tomas_423)
- 235. Maryann Totaro, oral comments delivered April 23, 2025 (Totaro_022)
- 236. Unnamed, written submission dated May 19, 2025 (Unnamed_330)
- 237. Zulay Valasquez, oral comments delivered April 24, 2025 (Valasquez_476)
- 238. Hector Vasquez, oral comments delivered April 23, 2025 (Vasquez_019), April 24, 2025 (Vasquez_477), and May 8, 2025 (Vasquez_478)
- 239. Rudio Vega, oral comments delivered April 24, 2025 (Vega_069)
- 240. Louise Velez, oral comments delivered April 24, 2025 (Velez_066)
- 241. Jaqueline Velez, oral comments delivered May 8, 2025 (Velez_479)
- 242. Barbara Waddell-Steele, written submission dated May 19, 2025 (Waddell-Steele_111)
- 243. Owen Waite, written submission dated May 11, 2025 (Waite_336)
- 244. David Warren, oral comments delivered April 23, 2025 (Warren_029) and May 8, 2025 (Warren_480); written submission dated May 19, 2025 (Warren_154)
- 245. Rachel Weekley, written submission dated May 10, 2025 (Weekley_350)
- 246. Nicole Whittier, written submission dated May 19, 2025 (Whittier_329)
- 247. Paul Wilcox, oral comments delivered April 23, 2025 (Wilcox_039)
- 248. Cassandra Williams, oral comments delivered May 8, 2025 (Williams_481)
- 249. James W. Williams, oral comments delivered May 8, 2025 (Williams_482)
- 250. Alexander Winter, written submission dated May 18, 2025 (Winter_089)
- 251. Dr. Lauren Wolf, written submission dated May 19, 2025 (Wolf_264)
- 252. Pamela Wolff, oral comments delivered April 23, 2025 (Wolff_034) and April 24, 2025 (Wolff_057)
- 253. Laura Wolf-Powers, written submission dated May 16, 2025 (Wolf-Powers_263)
- 254. Hui Cheng Yong, written submission dated May 1, 2025 (Yong_208)
- 255. Ashina Yorke, written submission dated April 23, 2025 (Yorke_013)
- 256. Audrey Yudell, written submission dated May 15, 2025 (Yudell_109)

- 257. Lora Zarubin, written submission dated May 15, 2025 (Zarubin_281)
- 258. Stop the Demolition Petition, 141 signatures, dated May 17, 2025
- 259. Stop the Land Grab Postcards, 30 postcards, dated May 17, 2025
- 260. Public Hearing FEC Redevelopment Support Statement, 100 signed submissions, dated May 20, 2025

Form Letter One

- 261. Caroline Abel, written submission dated May 18, 2025 (Abel_130)
- 262. Robert Abideen, written submission dated May 17, 2025 (Abideen_548)
- 263. Sarah Ahn, written submission dated May 19, 2025 (Ahn_378)
- 264. Cara Aloisio, written submission dated May 19, 2025 (Aloisio_119)
- 265. Kathleen Alorn, written submission dated May 17, 2025 (Alorn_518)
- 266. Kathie Amatniek, written submission dated May 17, 2025 (Amatniek_252)
- 267. ambrownesquire, written submission dated May 18, 2025 (ambrownesquire_097)
- 268. Toni Arenstein, written submission dated May 16, 2025 (Arenstein_406)
- 269. Eleanor Arons, written submission dated May 10, 2025 (Arons_172)
- 270. Dianne Athey, written submission dated May 18, 2025 (Athey_162)
- 271. Teresa M. Augello, written submission dated May 9, 2025 (Augello_400)
- 272. Celia Baez, written submission dated May 2, 2025 (Baez_134) and May 15, 2025 (Baez_133)
- 273. Ting Barrow, written submission dated May 9, 2025 (Barrow_404)
- 274. Aipha Batriss, written submission dated May 17, 2025 (Batriss_517)
- 275. Erica Baum, written submission dated May 9, 2025 (Baum_175) and May 18, 2025 (Baum_174)
- 276. Linda Bianchi, written submission dated May 18, 2025 (Bianchi_276)
- 277. Lisa Birnbaum, written submission dated May 17, 2025 (Birnbaum_508)
- 278. Lilien Black, written submissions dated May 1, 2025 (Black_275) and May 13, 2025 (Black_274)
- 279. George Bloomer, written submission dated May 17, 2025 (Bloomer_497)
- 280. Françoise Astorg Bollack, written submission dated May 13, 2025 (Bollack_188)
- 281. Sabrina Brazile, written submission dated May 1, 2025 (Bazile_367)
- 282. Robert Brenner, written submission dated May 19, 2025 (Brenner_362)
- 283. Michael Brom, written submission dated May 17, 2025 (Brom_515)
- 284. Thea Brooks, written submission dated May 18, 2025 (Brooks_401)
- 285. Aaron Brorde, written submission dated May 17, 2025 (Brorde_521)
- 286. Jennifer Bruno, written submissions dated May 18, 2025 (Bruno_218, Bruno_219)
- 287. Alice Bryant, written submission dated May 17, 2025 (Bryant_505)
- 288. Eddie Burch, written submission dated May 10, 2025 (Burch_167)
- 289. Kathleen Cahill, written submission dated May 17, 2025 (Cahill_552)
- 290. Sara Catalinotto, written submission dated May 14, 2025 (Catalinotto_376)
- 291. Sophia Cieri, written submission dated May 19, 2025 (Cieri_385)
- 292. Carol Clark, written submission dated May 2, 2025 (Clark_123)
- 293. Flor Clemente, written submission dated May 17, 2025 (Clemente_185)
- 294. Edna Cohen, written submission dated May 18, 2025 (Cohen_168)
- 295. Edrie Cote, written submissions dated May 4, 2025 (Cote_171) and May 13, 2025 (Cote_170)
- 296. Alexa Cruz, written submissions dated May 1, 2025 (Cruz_088)
- 297. Susan De Castro, written submission dated May 3, 2025 (De Castro_392)
- 298. Jennifer Dobbs, written submission dated May 17, 2025 (Dobbs_507)
- 299. J Dousmanis, written submission dated May 17, 2025 (Dousmanis_527)
- 300. Jenny Dubnau, written submissions dated May 1, 2025 (Dubnau_223) and May 14, 2025 (Dubnau_222)
- 301. Janice Eichler, written submission dated May 17, 2025 (Eichler_510)

302. Vittoria Fariello, written submission dated May 1, 2025 (Fariello_417)
303. Gabrielle Feldman, written submission dated May 15, 2025 (Feldman_193)
304. Lisa Flanzraich, written submission dated May 18, 2025 (Flanzraich_278)
305. Gloria Florian, written submission dated May 2, 2025 (Florian_200)
306. Dr. Harriet Fraad, written submission dated May 19, 2025 (Fraad_192)
307. Andrea Franchini, written submission dated May 13, 2025 (Franchini_101)
308. Susan Frost, written submission dated May 2, 2025 (Frost_393)
309. Sarasiah Gardner, written submission dated May 17, 2025 (Gardner_506)
310. Darcey Kane Geary, written submission dated May 10, 2025 (Geary_150)
311. Carol Giardina, written submission dated May 13, 2025 (Giardina_124)
312. Rachel Gibbons, written submission dated May 17, 2025 (Gibbons_530)
313. Siide Gil-Frederick, written submission dated May 13, 2025 (Gil-Frederick_383)
314. Harold Gilstein, written submission dated May 17, 2025 (Gilstein_514)
315. Wendy Ginsberg, written submission dated May 1, 2025 (Ginsberg_418)
316. Chrys Gomez, written submission dated May 15, 2025 (Gomez_140)
317. Erwin Gonzalez, written submission dated May 5, 2025 (Gonzalez_178)
318. Carole Linda Gonzalez, written submission dated May 15, 2025 (Gonzalez_129)
319. Luana Green, written submission dated May 19, 2025 (Green_284)
320. E.L. Greene, written submission dated May 18, 2025 (Greene_166)
321. Tracy Gross, written submission dated May 4, 2025 (Gross_410) and May 17, 2025 (Gross_524)
322. Allison Guttu, written submission dated May 17, 2025 (Guttu_496)
323. George Haikalis, written submission dated May 1, 2025 (Haikalis_198)
324. M Halen, written submission dated May 17, 2025 (Halen_504)
325. Daniel Harmeling, written submission dated May 17, 2025 (Harmeling_523)
326. Stephanie Hedgecoke, written submission dated May 18, 2025 (Hedgecoke_389)
327. Frank (Mark) Heflin, written submission dated May 1, 2025 (Heflin_190)
328. Caitlin Hickerson, written submission dated May 15, 2025 (Hickerson_118)
329. Ashley Hicks, written submission dated May 14, 2025 (Hicks_107)
330. Andrew Humm, written submission dated May 19, 2025 (Humm_102)
331. Yvonne Hunte, written submission dated May 17, 2025 (Hunte_542)
332. Ann Jacobs, written submission dated May 17, 2025 (Jacobs_503)
333. Mariama James, written submission dated May 1, 2025 (James_296)
334. Deneise Jennings-Houston, written submission dated May 16, 2025 (Jennings-Houston_159)
335. Casey Jong, written submission dated May 19, 2025 (Jong_131)
336. Joan Kane, written submission dated May 17, 2025 (Jane_534)
337. Cindi Katz, written submission dated May 2, 2025 (Katz_141)
338. Robert Kaufman, written submission dated May 18, 2025 (Kaufman_483)
339. Samuel Keghlian, written submission dated May 17, 2025 (Keghlian_494)
340. Judy Kellersberger, written submission dated May 15, 2025 (Kellersberger_238)
341. Lucy Keyes, written submission dated May 4, 2025 (Keyes_285)
342. Matthre Kilgore, written submission dated May 17, 2025 (Kilgore_537)
343. Anne Kockman, written submission dated May 19, 2025 (Kockman_106)
344. Roy Koshy, written submission dated May 10, 2025 (Koshy_366)
345. Tracy Lang, written submission dated May 17, 2025 (Lang_516)
346. Jaclyn Langer, written submission dated May 17, 2025 (Langer_545)
347. Dr. Marc Lavietes, written submission dated May 19, 2025 (Lavietes_292)
348. Ashley Lawson, written submission dated May 13, 2025 (Lawson_108)
349. Diane Lazarus, President, Neighbors of 300 West 21st, 22nd & 23rd Sts Block Association, written submission dated May 7, 2025 (Lazarus_160)
350. Melanie Lee, written submissions dated May 15, 2025 (Lee_307, Lee_308)
351. Gary Lee, written submission dated May 17, 2025 (Lee_550)

- 352. Sandra LeMonds, written submission dated May 16, 2025 (LeMonds_373)
- 353. Nadina LeSpina, written submission dated May 17, 2025 (LeSpina_489)
- 354. Diane Levenson, written submission dated May 13, 2025 (Levenson_161)
- 355. Laura Liben, written submissions dated May 19, 2025 (Liben_261, Liben_486)
- 356. Reily Lint, written submission dated May 17, 2025 (Lint_551)
- 357. Carol Lipton, written submission dated May 9, 2025 (Lipton_126)
- 358. Rita Louard, written submission dated May 15, 2025 (Louard_361)
- 359. Loraine Machlin, written submission dated May 17, 2025 (Machlin_509)
- 360. Evelyn Malave, written submissions dated May 2, 2025 (Malave_182) and May 15, 2025 (Malave_181)
- 361. Rishi Malhotra, written submission dated May 18, 2025 (Malhotra_359)
- 362. Catherine Malichio, written submission dated May 17, 2025 (Malichio_539)
- 363. marbkn@aol.com, written submission dated May 2, 2025 (marbkn_291)
- 364. Charlotte Marchant, written submission dated May 18, 2025 (Marchant_137)
- 365. Dina Marenstein, written submission dated May 18, 2025 (Marenstein_163)
- 366. Debbie Martin, written submission dated May 1, 2025 (Martin_155)
- 367. Melinda Jo Marx, written submission dated May 2, 2025 (Marx_310)
- 368. Betty Mauceri, written submission dated May 5, 2025 (Mauceri_114)
- 369. Stephen J McCann, written submission dated May 17, 2025 (McCann_498)
- 370. Chandtisse McClaurin, written submission dated May 19, 2025 (McClaurin_135)
- 371. Jean E Merae, written submission dated May 17, 2025 (Merae_495)
- 372. Mario G. Messina, written submission dated May 1, 2025 (Messina_298)
- 373. Pnina Michelson, written submissions dated May 9, 2025 (Michelson_348) and May 13, 2025 (Michelson_347)
- 374. Cynthia Millman, written submission dated May 15, 2025 (Millman_145)
- 375. Gail Mitchell, written submission dated May 14, 2025 (Mitchell_194)
- 376. Joseph Moore, written submission dated May 13, 2025 (Moore_231)
- 377. Yvonne Morrow, written submission dated May 15, 2025 (Morrow_427)
- 378. Diane Mullins, written submission dated May 18, 2025 (Mullins_484)
- 379. Susan Nash, written submission dated May 6, 2025 (Nash_397) and May 13, 2025 (Nash_396)
- 380. Elizabeth Neal, written submission dated May 10, 2025 (Neal_173)
- 381. Su Ng, written submissions dated May 7, 2025 (Ng_391) and May 15, 2025 (Ng_390)
- 382. Michael Niederman, written submissions dated May 2, 2025 (Niederman_314) and May 7, 2025 (Niederman_313)
- 383. Brigid O'Dea, written submissions dated May 5, 2025 (O'Dea_117) and May 18, 2025 (O'Dea_116)
- 384. Sarah O'Neill, written submission dated May 6, 2025 (O'Neill_379)
- 385. Katherine O'Sullivan, written submissions dated May 1, 2025 (O'Sullivan_251) and May 13, 2025 (O'Sullivan_249, O'Sullivan_250)
- 386. Regina Olff, written submission dated May 18, 2025 (Olff_353)
- 387. Barrie Olsen, written submission dated May 15, 2025 (Olsen_112)
- 388. Leslie Olsen, written submission dated May 17, 2025 (Olsen_487)
- 389. Susan Opotow, written submission dated May 14, 2025 (Opotow_398)
- 390. Maria E. Ortiz, written submission dated May 1, 2025 (Ortiz_295)
- 391. Shyama Orum, written submission dated May 16, 2025 (Orum_382)
- 392. Kate Penrose, written submission dated May 18, 2025 (Penrose_248)
- 393. Yahaira Peoples, written submission dated May 18, 2025 (Peoples_422)
- 394. Connie Perry, written submission dated May 2, 2025 (Perry_144)
- 395. N Narricuico, written submission dated May 17, 2025 (Narricuico_535)
- 396. Nasir Pickens, written submission dated May 17, 2025 (Pickens_528)
- 397. Victoria Pinderhughes, written submission dated May 18, 2025 (Pinderhughes_414)

- 398. Leonard Polletta, written submissions dated May 15, 2025 (Polletta_267) and May 19, 2025 (Polletta_268)
- 399. Sara Radelet, written submission dated May 19, 2025 (Radelet_377)
- 400. Rosalie Regal, written submission dated May 13, 2025 (Regal_365)
- 401. Sandy Reiburn, written submission dated May 1, 2025 (Reiburn_375)
- 402. Sora Reiner, written submission dated May 17, 2025 (Reiner_511)
- 403. Harriet Reisen, written submission dated May 18, 2025 (Reisen_204)
- 404. Evelyn Jones Rich, Executive Director, New York City Americans for Democratic Action, written submission dated May 17, 2025 (Rich_180)
- 405. Javier Riveros, written submission dated May 17, 2025 (Riveros_493)
- 406. Renee Rizzo, written submissions dated May 2, 2025 (Rizzo_357, Rizzo_356) and May 14, 2025 (Rizzo_355)
- 407. Michael Rogol, written submission dated May 17, 2025 (Rogol_529)
- 408. Joan A. Rose, written submission dated May 14, 2025 (Rose_225)
- 409. Helen Rosenberg, written submission dated May 15, 2025 (Rosenberg_205)
- 410. Theresa Roth, written submission dated May 4, 2025 (Roth_403) and May 19, 2025 (Roth_402)
- 411. Marian Rothstein, written submission dated May 1, 2025 (Rothstein_297)
- 412. Trudy Rudnick, written submission dated May 1, 2025 (Rudnick_411)
- 413. Divina Cua Rule, written submission dated May 19, 2025 (Rule_164)
- 414. Margaret Ryan, written submission dated May 17, 2025 (Ryan_540)
- 415. Alice Rydel, written submission dated May 2, 2025 (Rydel_090)
- 416. Gilbert Sabater, written submission dated May 1, 2025 (Sabater_199)
- 417. Gale Saddy, written submission dated May 18, 2025 (Saddy_196)
- 418. Frank Sanchis, written submission dated May 13, 2025 (Sanchis_191)
- 419. Kathie Sarachild, written submissions dated May 13, 2025 (Sarachild_254) and May 17, 2025 (Sarachild_253)
- 420. Carol Schapiro, written submission dated May 14, 2025 (Schapiro_127)
- 421. Monte Schapiro, written submission dated May 17, 2025 (Schapiro_525)
- 422. Leslie Schneider, written submission dated May 17, 2025 (Schneider_490)
- 423. Gary Schoichet, written submission dated May 17, 2025 (Schoichet_533)
- 424. Kathleen Seward, written submission dated May 17, 2025 (Seward_557)
- 425. NK Shapiro, written submission dated May 17, 2025 (Shapiro_543)
- 426. Alyson Shotz, written submission dated May 19, 2025 (Shotz_096)
- 427. Susan M. Singer, written submission dated May 14, 2025 (Singer_395)
- 428. Donna Marie Smith, written submission dated May 13, 2025 (Smith_165)
- 429. Aaron Smucker, written submission dated May 9, 2025 (Smucker_083)
- 430. Daniel Soso, written submission dated May 5, 2025 (Soso_148)
- 431. Mary Soto, written submission dated May 17, 2025 (Soto_547)
- 432. Henrietta Stern, written submission dated May 6, 2025 (Stern_206)
- 433. Rima Suqi, written submission dated May 2, 2025 (Suqi_358)
- 434. Colette Swietnicki, written submission dated May 2, 2025 (Swietnicki_143)
- 435. Sylvia Syracuse, written submission dated May 15, 2025 (Syracuse_399)
- 436. Abby Tannenbaum, written submission dated May 17, 2025 (Tannenbaum_549)
- 437. Amy Taylor, written submission dated May 19, 2025 (Taylor_099)
- 438. Katie Tehrig, written submission dated May 17, 2025 (Tehrig_531)
- 439. Brenda Temple, written submission dated May 13, 2025 (Temple_115)
- 440. Vandra Thorburn, written submission dated May 9, 2025 (Thorburn_412)
- 441. Stavroula Tioska, written submission dated May 17, 2025 (Tioska_386)
- 442. Benedetta Valentin, written submission dated May 17, 2025 (Valentin_513)
- 443. Stefanie Vinopal, written submissions dated May 7, 2025 (Vinopal_388) and May 13, 2025 (Vinopal_387)

- 444. Carol Weinstein, written submission dated May 2, 2025 (Weinstein_128)
- 445. M Wells, written submission dated May 17, 2025 (Wells_492)
- 446. Shan Willson, written submission dated May 9, 2025 (Willson_381)
- 447. Fanie Wu, written submission dated May 17, 2025 (Wu_501)
- 448. Rena Zager, written submission dated May 17, 2025 (Zager_354)
- 449. Elizabeth Zimmer, written submission dated May 17, 2025 (Zimmer_512)
- 450. Twenty written submissions with illegible signatures, dated May 17, 2025 (Unknown_488, Unknown_491, Unknown_499, Unknown_500, Unknown_502, Unknown_519, Unknown_520, Unknown_522, Unknown_526, Unknown_532, Unknown_536, Unknown_538, Unknown_541, Unknown_544, Unknown_546, Unknown_553, Unknown_554, Unknown_555, Unknown_556, Unknown_558)

Form Letter Two

- 451. Denise Bosco, written submission dated May 16, 2025 (Bosco_158)
- 452. Faith Cohen, written submission dated May 18, 2025 (Cohen_183)
- 453. Deborah Frame, written submission dated May 16, 2025 (Frame_156)
- 454. Carlos Gutierrez-Solana, written submission dated May 16, 2025 (Gutierrez-Solana_120)
- 455. Michele Kaufman, written submission dated May 14, 2025 (Kaufman_316)
- 456. Melanie Lee, written submission dated May 15, 2025 (Lee_309)
- 457. Mark McManus, written submission dated May 19, 2025 (McManus_299)
- 458. Gail Mitchell, written submission dated May 14, 2025 (Mitchell_195)
- 459. Christopher Russell, written submission dated May 14, 2025 (Russell_139)
- 460. Michelle Spinner, written submission dated May 18, 2025 (Spinner_319)
- 461. Dara Wishingrad, written submission dated May 15, 2025 (Wishingrad_149)

C. COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Project Description (Chapters 01.0, “Purpose and Need for the Proposed Project,” 02.0, “Project Alternatives, 03.0, “Process, Coordination, and Public Participation,” and 04.0, “Analysis Framework”)

Comment 1: The proposed building massing should be refined to better reflect the scale and character of the Chelsea neighborhood. Specifically, the greatest building heights should be concentrated along the Tenth Avenue corridor – where the existing urban context supports taller structures – and heights should progressively taper down toward Ninth Avenue.

High-quality façade materials that are in keeping with Chelsea’s architectural identity; new buildings should incorporate warm, contextual materials such as brick and stone. (Bottcher et al_077)

Response 1: As discussed in EIS **Chapter 02.0, “Project Alternatives,”** among the four alternatives considered for implementation of the Proposed Project that are analyzed in the DEIS and the FEIS is a Midblock Bulk Alternative, which would focus taller buildings and density towards the midblock areas of the east-west streets in the Fulton Houses Project Site, with shorter, less dense buildings located along 9th Avenue. As detailed in EIS **Chapter 05.07, “Urban Design and Visual**

Resources,” none of the feasible alternatives under consideration for implementation of the Proposed Project would result in any significant adverse urban design impacts, as the buildings facilitated by the Proposed Project under each of the four feasible alternatives would be compatible with the existing and emerging character of the surrounding secondary study area, with its range of low, mid, and high-rise buildings oriented towards the street. Refer to EIS **Chapter 02.0, “Project Alternatives,”** which includes site plans showing the heights of buildings under each of the analyzed alternatives in Figures 02.0-1a/b to 02.0-5a/b.

Comment 2: We advocate for studying the impact of increasing affordable housing percentages within the market-rate components, working toward an overall affordability target of at least 50% across the full portfolio of mixed-income buildings. The environmental review should analyze this higher-affordability scenario to preserve flexibility as the project evolves and to reflect community priorities around housing equity. (Bottcher et al_077)

Response 2: As discussed in EIS **Chapter 02.0, “Project Alternatives,”** in addition to replacing each existing Section 9 NYCHA dwelling unit (DU) with a new permanently affordable Section 8 Project-Based Voucher (PBV) DU, the Preferred, Non-Rezoning, Midblock Bulk, and City of Yes (COY) Alternatives would also provide up to 1,038, 536, 1,038 and 809 permanently affordable DUs, respectively using affordability percentages and income distributions that are standard for mixed-income housing throughout New York City. Studying the feasibility of an increased affordability mix involving a higher-affordable scenario is outside the scope of the EIS.

Comment 3: We support the goal of ensuring that NYCHA residents receive their new apartments first and recognize the importance of phasing construction to minimize disruption. At the same time, we encourage the development team to explore options that promote greater integration of NYCHA and non-NYCHA residents within the same buildings.

Achieving this balance is consistent with the Where We Live NYC framework, which emphasizes the importance of inclusive, mixed-income communities. Thoughtful design and planning can help ensure that long-standing residents are prioritized while also fostering a more unified, connected neighborhood. (Bottcher et al_077)

Response 3: One of the priorities considered in the design of all Proposed Project alternatives was to construct new buildings with replacement units for all existing NYCHA residents before the construction of any housing units for new residents. NYCHA and the Permanent Affordable Commitment Together (PACT) Partner believe that upon completion of construction of the overall Proposed Project, there would be a greater mix of housing types than exists currently, given the proximity and interspersing of the replacement buildings and new mixed income residential buildings with shared accessory open spaces across the Project Sites’ blocks.

Comment 4:

The new proposal [i.e., the Proposed Project] reflected a significant departure from The Chelsea NYCHA Working Group's consensus renovation plan and was not formally presented to the public or MCB4 prior to its public release. ... Further, [regarding the survey of FEC residents on future of the Project Sites] MCB4 stated that if the results do not demonstrate a clear majority support among leaseholders, then "an independent agency certified to administer a vote of residents' preferences should be retained." (CB4_078)

I reject categorically the premise of the DEIS in Section 2.0 that Alternative 5, Rehabilitation and Infill, the option that meets the criteria of the Chelsea Working Group and was fully supported by Community Board 4 is "infeasible." How can that be when through a FOIL request we have in our possession three RFPS completed by reputable developers, one by Related itself, that proposed that very option? These documents also include financial data that NYCHA has refused to share. (Andre_056)

Perfunctory and inadequate consideration of a Rehabilitation and Infill Alternative: In response to a request from Community Board 4, NYCHA included analysis of a Rehabilitation and Infill Alternative. The presented alternative was recycled from a scheme in Related and Essence's RFP response that proposed a single infill tower containing 110 units on the Elliott-Chelsea campus. It was found financially and logistically infeasible without a substantiating detailed analysis. NYCHA had at its disposal several other, more profitable infill schemes: an alternate scheme from Related and Essence's RFP response that included two infill buildings at Elliott-Chelsea providing 286 units; an RFP response from the Chelsea Forward team that included four infill buildings at Fulton providing up to 492 units; and an RFP response from the Westside Preservation Partners team that included four infill building at Fulton and one infill building at Elliott-Chelsea providing a total of up to 665 units. (These RFP responses were obtained by a community member under Freedom of Information Law.) The presented Rehabilitation and Infill Alternative was not only the weakest of these, but was presented in such a perfunctory way that, on the provided plans: building heights were not labeled and it was impossible to tell where the proposed 110-unit tower stood on the grounds of the Elliott-Chelsea Houses. The presented alternative is not a serious or legitimate response to CB4's request.

Requested Information: Explain why NYCHA responded to the request for a rehabilitation-and-infill alternative with a scheme that was clearly set up to fail, having effectively already been deemed insufficient by the agency, prompting abandonment of the RFP's scope of work, rather than any of the schemes described above, all of which would generate more revenue and resident-relocation options?

Provide a seriously considered Rehabilitation and Infill Alternative. (Holowka_429)

There is an alternative! The 'Rehabilitation' alternative was dismissed as infeasible in DEIS. Community groups disagree with that dismissal. Why was rehabilitation dismissed? (Gelb_363)

We note with grave concern that the Alternative 5, proposed by the Chelsea Working Group, has already been deemed infeasible, without sufficient detailing of why and how? (Cahill_271)

The people who now live in those houses would like to stay there if the current decrepit conditions which never should have been allowed to happen are repaired. The estimates for rehabilitation have been inflated despite being more cost-effective than new housing. (Andre_056)

The reasons cited for “infeasibility” for Alternative 5 strain credulity. I live in a 150-year-old-building that had an ADA accessible elevator added. Surely there is a way for a company with the know-how and resources of the PACT Partner to figure this out. As for the asbestos, ACMs are literally found in 70% of the buildings in New York City, and they are not being demolished because of it. This is also true of the facade issue. There was never, despite repeated requests from CB4 and the community, any outside analysis or data to show how or why the cost of renovating FEC was so extraordinary different than what it cost to renovate the Edenwald Houses. Here, as in so many other places in the DEIS, we have an absence of supporting facts, and a surfeit of self-serving assertions. (Andre_056)

It is also stated in the document that Alternative 5, Rehabilitation and Infill, does not have unmitigated adverse impacts. Given that this is the case, why isn't it privileged in the document? Dare I suggest that the old (or is it relatively new) adage, profits over people, is in play here? If given a choice, does anyone making the final determination here believe most residents and community members would choose in favor of numerous unmitigated adverse impacts? WHY IS NYCHA PRIVILEGING A CHOICE THAT PERMANENTLY REDUCES THE QUALITY OF LIFE IN THE COMMUNITY?? WHY IS THAT AN ACCEPTABLE OUTCOME FOR THIS PROCESS? (Andre_056)

I request that HPD conduct a more thorough, un-biased, detailed, data and numbers-driven assessment of the Alternative 5, Refurbishment and Infill, using the same standards that were applied to the Edenwald Houses, and referencing the original RFP submitted by Related Company. (Andre_056)

What are the specific financial reasons for NYCHA's conclusion that renovation of the 24 existing buildings is not feasible? Does NYCHA have documentation supporting specific financial reasons for its conclusion that renovation is not feasible to correct the deterioration and maintenance problems at FEC houses? (Polletta_268)

The DEIS's declaration that a “No Significant Adverse Impacts Alternative will not be analyzed further in the EIS” because a scaled-back project would fail to meet the proposed project's scale is a tacit admission of the project's fundamental incompatibility with the existing environment. It essentially states that the environment must be sacrificed to accommodate the project's oversized ambitions. Another interpretation of this statement is that a full and transparent disclosure of the proposed project's environmental impacts would reveal its unviability if environmental protection were a genuine concern. (Lunke_076)

I'm looking at the Wikipedia page on environmental impact statement, and I see something which says, "Least Environmentally Damaging Practice Practical Alternative, LEDPA." It doesn't seem like that, or that has been completely ignored. (Robinson_055)

Given that financing for renovation, maintenance, demolition, and new construction all draw upon significant public tax dollars, due diligence mandates the adoption of the least intensive and most cost-effective solution for enhancing the quality of life for FEC residents. Demolition and new construction are projected to cost more than double the expense of renovation, with demolition costs not even factored into the current accounting. NYCHA's well-documented history of mismanagement and corruption in contracting practices further amplifies the potential for the costs of full demolition and reconstruction to far exceed those of renovation. (Lunke_076).

Response 4:

EIS Chapters 01.0, "Purpose and Need for the Proposed Project" and 03.0, "Process, Coordination, and Public Participation" contain a description of the extensive public engagement process that has occurred in connection with the Proposed Project. As described in those EIS chapters, the Citizens Housing & Planning Council (CHPC) served as an independent third party to review and tabulate the results of a survey of NYCHA residents to determine whether they preferred rehabilitation or full replacement of their existing dwelling units. Based on CHPC's analysis, 969 residents participated in the survey, which represents approximately 29% of the total eligible population across both campuses. Approximately 37% of all households had at least one individual who submitted a survey response. Of those residents who submitted a response, 57% indicated a preference for new construction/full replacement of existing units. The survey results were announced June 21, 2023, and NYCHA thereafter indicated its intention to move forward with the Proposed Project consistent with the survey results and a presentation regarding the resident survey process was provided to Manhattan Community Board 4: Chelsea Land Use Committee on April 15, 2024. Please visit this link for more information regarding the resident survey and responses as well as a link to the presentation given to Community Board 4 (CB4) under the Resident Survey section: <<https://www.nyc.gov/site/nycha/about/pact/chelsea-fulton.page>>.

Regarding the Rehabilitation and Infill Alternative, as discussed in EIS **Chapter 02.0, "Project Alternatives,"** due to the cost to carry out the capital needs required under this alternative, as substantiated in both a comprehensive, five-month, pre-design due diligence process undertaken by the PACT Partner and by NYCHA's 2023 Physical Needs Assessment (PNA), NYCHA and the PACT Partner determined that this alternative would be financially and logistically infeasible. Regarding the No Significant Adverse Impacts Alternative, as discussed in **Chapter 02.0**, a No Significant Adverse Impacts Alternative is not feasible, as it would not meet the proposed purpose and need for the Proposed Project. Regarding the Least Environmentally Damaging Practicable Alternative (LEDPA)F, this is not applicable to the Proposed Project.

Comment 5:

MCB4 asserted that the Proposed Project directly contradicts the integration goals of HPD's Where We Live NYC framework and undermines community cohesion. The Board found it "alarming that 70% of NYCHA's land on this project will be used for the new, market rate and mixed-income housing, leaving just 30% for existing NYCHA housing." MCB4 highlighted the absence of detailed affordability bands for new units and urged a greater focus on moderate- and middle-income housing to maintain balance and prevent further displacement. MCB4 also called for "enhanced" tenant protections, a detailed temporary and permanent relocation plan – particularly for seniors – and legally enforceable guarantees to ensure permanent affordability. (CB4_078)

The allocated space for current residents is inadequately regards to the new redevelopment plan. Almost 80 percent of the current land will be used for private development. (Gadsden_050)

What of socioeconomic impacts, the trauma of relocation, of severing the community bonds? That's not in the DEIS either. It mentions displacement the way world would mention bad weather. Well, you know, it's unfortunate, but not worth studying. (Law-Gisiko_081)

Both complexes have a mostly geriatric population living in them. To have them move, to even give them an idea that they may have to pack up and leave their homes and be displaced for years, has already had an incredibly detrimental effect as seniors from both places I have talked to have reported stress, high blood pressure, depression, anxiety, etc. over this prospect. (Meinhardt_008)

Response 5:

As described in EIS **Chapter 02.0, "Project Alternatives,"** the Proposed Project would involve two types of permanently affordable housing. First, the PACT Partner has committed to a one-for-one replacement of all 2,056 existing NYCHA Fulton and Elliott-Chelsea (FEC) DUs with Section 8 PBV DUs to be constructed prior to the development of any additional new mixed-income housing on the Project Sites. Second, it would include the creation of 1,038, 536, 1,038, or 809 additional new affordable housing units in new developments pursuant to Mandatory Inclusionary Housing (MIH) requirements under the Preferred ⁴ Alternative, the Non-Rezoning Alternative, the Midblock Bulk Alternative, and COY Alternative, respectively, via legally binding documents and applicable statutory and regulatory programs. The COY Alternative also would be required to comply with Universal Affordability Preference (UAP) requirements. These requirements reflect City policy on the required affordability bands and are described in EIS **Chapter 05.02, "Socioeconomic Conditions."** These alternatives would also provide up to 2,416, 1,247, 2,416, and 1,889 market rate units, respectively, which would financially support the PACT and affordable housing components of the Proposed Project. **Chapter 05.02** also describes the temporary relocation plans for the up to 120 households (less than 6% of existing

⁴ The Rezoning Alternative referred to in the DEIS has been identified as the Preferred Alternative in the FEIS and that term is used throughout the responses in this chapter, except where for reasons of context the previous name is mentioned. See **Chapter 02.0, "Project Alternatives,"** for more information.

households) to be temporarily relocated and for the Elliott Center (community center), also to be temporarily relocated, which will adhere to requirements of applicable statutes and regulations, including but not limited to the Uniform Relocation Act (URA) and implementing regulations of Rental Assistance Demonstration (RAD) Fair Housing, Civil Rights, and Relocation Notice, Section 18 of the Housing Act of 1937, as amended and implementing regulation, 24 CFR part 970 and all applicable State and local regulations. The remainder of other residents (approximately 94% of existing residents) and community facilities would only move once - directly from their existing locations to new permanent locations, i.e., not requiring temporary relocation policies. Pursuant to the above-referenced regulations, policies, and procedures, the PACT Partner will provide assistance with packing and moving needs for households requiring temporary relocation and will provide assistance to all households for their move into their new permanent homes.

Regarding the Where We Live NYC (WWLNYC) Plan, as noted in EIS **Chapter 05.01, "Land Use, Zoning, and Public Policy,"** the Proposed Project would support the goals of the plan. These include a goal to "Preserve affordable housing and prevent displacement of long-time residents" so as to combat segregation and advance opportunity for all. Two planned WWLNYC actions to advance this goal are directly related to the Proposed Project: Action 3.1.2: "Rehabilitate 62,000 units through NYCHA's PACT portfolio, which uses public-private partnerships to fund extensive renovations and repairs..." Action 3.1.3: "Develop new, mixed-income housing developments on NYCHA land in order to create new, high-quality affordable homes in amenity-rich areas and generate \$2 billion in funds for capital repairs in 10,000 NYCHA apartments by 2028. NYCHA has conducted extensive community engagement at the Project Sites to produce community-driven recommendations for the future of Chelsea, Chelsea Addition, Elliot, and Fulton Houses."

Comment 6:

MCB4 reiterates its strong objection to the exclusion of a fully developed rehabilitation alternative that preserves existing NYCHA buildings. NYCHA included Alternative 5 in the Draft Environmental Impact Statement (DEIS), framing it as a "Rehabilitation and Infill" scenario that integrates renovation, partial demolition, and new construction. MCB4 calls for a revised and complete Alternative 5 scenario that reflects the full portfolio of Working Group-vetted infill sites; updates financial assumptions using current market conditions, rental income projections, and applicable FAR increases; and provides a transparent, site-by-site comparison to demonstrate how these sites could generate sufficient capital to fund comprehensive rehabilitation while preserving deeply affordable housing and honoring resident priorities. (CB4_078)

Displacement of tenants. There is woefully little low-income housing in the city in general and in Chelsea in particular. Chelsea has been a mixed income neighborhood for at least 100 years, and to evict thousands of lower-income tenants is very much an old-school Robert Moses type of move to white-wash and income-wash the neighborhood. It is offensive. There is no chance that these

tenants could be re-housed in our neighborhood, and by the time the 30-year plan is complete NYC would therefore have lost these thousands of tenants, their work, and their taxes to other more far-flung places. Rehab, while potentially somewhat disruptive can be structured in a way that for the most part with planned mitigation, tenants can remain in their homes. (Fischer_323)

Response 6: The Rehabilitation and Infill Alternative identified and assessed in the EIS reflects the PACT Partner’s Request for Proposals (RFP) response, which in turn originates from a development scenario in the Chelsea NYCHA Working Group (CNWG) report that the PACT Partner used to inform their original proposal in response to the RFP. EIS **Chapter 02.0, “Project Alternatives”** discusses that the Rehabilitation and Infill Alternative would be financially and logistically infeasible. See the chapter for details.

Comment 7: MCB4 also notes a fundamental flaw in the analysis: “At Elliott-Chelsea, the Midblock Alternative and the Rezoning Alternative are exactly the same,” raising the question of whether the DEIS is honestly evaluating distinct, meaningful alternatives. (CB4_078)

Response 7: As described in EIS **Chapter 02.0, “Project Alternatives”**, there are four feasible alternatives identified in the EIS: the Preferred Alternative, the Non-Rezoning Alternative, the Midblock Bulk Alternative, and the COY Alternative. The overall development program of the Midblock Bulk Alternative is the same as the Preferred Alternative but would differ in terms of the arrangement of bulk (i.e., the geographic distribution of buildings, building heights and setbacks, and open areas) on the Fulton Houses Project Site. Under the Preferred Alternative, the tallest building on the Fulton Houses Project Site would be located along 9th Avenue and under the Midblock Bulk Alternative the tallest building on the Fulton Houses Project Site would be located in the midblock areas. The arrangement of bulk on the Elliott-Chelsea Houses would be the same between the Preferred Alternative and the Midblock Bulk Alternative because at the Elliott-Chelsea Houses Project Site, the Preferred and Non-Rezoning Alternatives already place substantial bulk at the mid-block. As such, the four alternatives considered for the Proposed Project, include three options for the Elliott-Chelsea Houses Project Site in terms of the arrangement of bulk, four options for the Fulton Houses Project Site, and three overall options in terms of development programs.

Comment 8: The DEIS fails to specify the new zoning district being pursued or to present alternative zoning strategies that could better align with community values. (CB4_078)

Response 8: While the exact zoning district designations that would be proposed to facilitate the Preferred Alternative or the Midblock Bulk Alternative are not identified, the parameters of the rezoning area are described, in terms of development programs, site plans and arrangement of building bulk. These represent the maximum extent of uses, density, and building volumes that would be achievable under the Preferred Alternative or the Midblock Bulk Alternative. The specific proposed zoning district designation(s) would be proposed in consultation with the

Department of City Planning and would be subject to public review under the Uniform Land Use Review Procedure (ULURP).

Comment 9: The DEIS acknowledges that “approximately half of the land on each site would be used for market-rate housing.” Yet, it offers no enforceable affordability strategy that aligns with the current NYCHA residents’ needs. MIH provisions may yield only 25–30% affordable units, often at 60–80% of Area Median Income (AMI), which excludes many of the lowest-income residents. MCB4 requests any proposed additional housing in the project include at least “50% affordable units overall,” noting that even the dismissed Rehabilitation and Infill Alternative assumed this level. That 50% affordability across the entire site was a key component to win support for the originally adopted Chelsea NYCHA Working Group Plan. (CB4_078)

Response 9: As discussed in EIS **Chapter 02.0, “Project Alternatives”**, the Preferred Alternative would result in 3,094 permanently affordable and 2,416 market rate DUs across both Project Sites. Of the 3,094 permanently affordable DUs, 2,056 would be permanently affordable Section 8 PBV DUs and 1,083 would be permanently affordable under MIH. As noted throughout the EIS, the permanent affordability of the affordable units would be ensured by various legally binding documents and applicable statutory and regulatory programs. Further, see response to comment 2.

Comment 10: MCB4 requests that the DEIS include a full analysis of the Rehabilitation and Infill Alternative, particularly given earlier commitments to evaluate this option in response to community feedback. (CB4_078)

Response 10: An analysis of the Rehabilitation and Infill Alternative is provided in EIS **Chapter 05.22, “Rehabilitation and Infill Alternative Analysis.”** This alternative was added as a result of comments on the Draft Scope of Work on the DEIS.

Comment 11: The DEIS only includes repair work under the No-Action Alternative. NYCHA, Related, and Essence must confirm that interim repairs will continue to protect the livability and safety of current residents during the proposed long, phased redevelopment timeline. (CB4_078)

Response 11: Interim repairs, known formally as “Maintenance and Operations Improvements at Fulton, Elliott, Chelsea, and Chelsea Addition Houses” and informally as the Bridge Plan, or formerly Meanwhile Work, are mentioned in EIS **Chapter 02.0, “Project Alternatives.”** This work is occurring independently and outside the scope of the Proposed Project. Information regarding this work is available at <https://www.fultonelliottchelsea.com/bridge-plan>. All repairs and maintenance will manage for existing hazards such as lead-based paint and asbestos in a manner that is consistent with all local and federal regulations and laws. In addition, mold and leaks in all units will be managed under the requirements of *Maribel Baez et al. v. NYCHA, No.13-Civ-8916*.

- Comment 12:** MCB4 requests confirmation that the proposed replacement NYCHA units will not result in a net loss of residential floor area compared to current conditions. (CB4_078)
- Response 12:** As noted in EIS **Chapter 01.0, “Purpose and Need for the Proposed Project,”** the Proposed Project would replace all 2,056 existing NYCHA public housing dwelling units with new Section 8 PBV DUs on a one-for-one basis. Analysis of apartment size is outside the scope of the EIS.
- Comment 13:** There is no clear statement in the DEIS or related materials reaffirming that no demolition of NYCHA buildings will occur prior to the completion of the ULURP process. Additionally, the DEIS references potential Mayoral Zoning Overrides (MZOs) but fails to disclose their scope, timing, or mechanism for public review. (CB4_078)
- Response 13:** As noted in EIS **Chapters 02.0, “Project Alternatives”** and **05.19 “Construction,”** construction on the Proposed Project is anticipated to begin in 2025 with demolition of one building on the Fulton Houses Project Site and one building on the Elliott-Chelsea Houses Project Site, to facilitate the first replacement building on each Project Site. These buildings are the same under each of the feasible alternatives and are allowed as-of-right under zoning and thus would proceed prior to any ULURP process under the Preferred Alternative or Midblock Bulk Alternative. As noted in EIS **Chapter 02.0, “Project Alternatives,”** MZOs are indicated as a possible future action to facilitate the Proposed Project under the analyzed feasible alternatives, to address, for example, non-compliant interim conditions on the Project Sites during the construction period. However, at this time, no MZO is being sought.
- Comment 14:** Please describe and detail the language and basis [that] legally authorizes the procurement for the proposed scale of new development given other RFP respondents were not give the same access or opportunity to make such proposals. (CB4_078)
- It is my understanding that the original request for proposal involved renovation of both campuses of its buildings and grounds. To effectively do this work NYCHA should have provided the bidders with the complete set of floor plans from the original construction documents and/or existing as built. These plans, if maintained, should have floor plans, sections, elevations, riser diagrams, site plans, zoning analysis, construction details, and specifications. Architectural, structural, plumbing, mechanical, elevator, and electrical data should exist in one form or another. (Robinson_082)
- The original RFP did not include any mention of demolition. When the developer was selected, their response did not include demolition. How was this changed made, and is it even legal? (Gelb_363)
- Explain how the proposal became one “to address the critical shortage of affordable housing and housing in general in New York City” after issuance of the

RFP, and why this radical change did not prompt issuance of a new RFP that would ensure the best result for the public through a competitive process.

There are so many flaws in this plan that we can all see. None of our elected officials are asking these questions. So I wonder what is the relationship with the Real Estate Board of New York to this project. The original RFP had three proposals; Related was selected. The original RFP did not mention demolition. Once Related was selected, the RFP for 1.9 billion was totally revised and was suddenly all about demolition. This was done without reopening the bidding process. How can that be legal? How can the city give public land to a private developer? The current tenants will be segregated into three buildings on each site. Isn't that what we call segregation? Over 250 bedrooms for the current residents will be lost. (Gelb_363)

Response 14: The information requested in these comments is outside the scope of the EIS.

Comment 15: Please detail why were the other alternatives proposed by CB4 in its comments on the DSOW excluded despite repeated community and elected official requests. Please detail the minimum level of demolition that NYCHA considers financially feasible under Alternative 6, the Rehabilitation and Infill Alternative. Absent this requested study, the DEIS leaves unanswered the question of whether demolition is necessary. (CB4_078)

Response 15: NYCHA, in its role as Project Sponsor and Joint Lead Agency, and HPD, in its role as Responsible Entity and Lead Agency, identified the alternatives to be considered for implementation of the Proposed Project in the EIS, consistent with the National Environmental Policy Act of 1969 (NEPA) and the State Environmental Quality Review Act (SEQRA), and made determinations as to feasibility of alternatives, which are discussed in EIS **Chapter 02.0, “Project Alternatives.”** As detailed in the chapter, this included consideration of information on capital repair costs of the Project Sites’ existing buildings provided by the PACT Partner’s 2022 five-month pre-design due diligence process and NYCHA’s 2023 PNA, which updated earlier assessments, including the 2017 PNA and CNWG report. The Rehabilitation and Infill Alternative, which only involves demolition of one community facility building, the Elliott Center, is not financially feasible. Responses to public comments on the Draft Scope of Work (DSOW) with respect to alternatives were provided in the “Response to Comments on the Draft Scope of Work for an EIS,” which is in EIS **Appendix A**.

Comment 16: The DEIS must explain why it disregarded the lower-bulk Non-Rezoning Alternative as a preferred option, especially given that NYCHA itself does not consider it infeasible. Please describe and detail the factors leading not to support midrise alternatives which lead to less visual disruption. (CB4_078)

Response 16: The DEIS did not identify a Preferred Alternative. The FEIS identifies the Rezoning Alternative as the Preferred Alternative, which provides new units to all current FEC residents and maximizes the number of both affordable and market rate DUs across the Project Sites, thus meeting the purpose and need for the

Proposed Project. Please refer to FEIS **Chapter 02.0, “Project Alternatives,”** for a further discussion of the rationale for this selection.

Comment 17: This DEIS narrowly defines environmental impacts in terms of construction related disruptions, noise and air quality during demolition and rebuilding. What it fails to account for are the irreparable social, cultural, and emotional costs of displacement. These are the very harms that environmental justice was intended to protect against. (Kites_044)

Response 17: In addition to analyzing potential impacts from construction in EIS **Chapter 05.19, “Construction,”** the EIS also considers potential socioeconomic and environmental justice impacts, among other categories of impacts, per the 2021 *CEQR Technical Manual (CTM)* and other applicable guidance.

Comment 18: Can an in depth up to date analysis be provided for the benefits and costs of rehabilitation vs. demolition/ reconstruction for this project. Much has been promised to tenants living in the projects but what are the specific benefits that inure to the community at large? And what are the costs and returns that Related is relying upon to undertake this project? What are the guarantees that the project, if undertaken, will be timely completed or completed at all, if there is a downturn in the real estate market? (Brown_085)

Response 18: As identified in EIS **Chapter 02.0, “Purpose and Need for the Proposed Project,”** the purpose and need for 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. It would do so by constructing new Section 8 PBV DUs for all existing residents, while also preserving permanent affordability and residents' rights under the PACT program. The Proposed Project would also 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. The new MIH or UAP-generated affordable units refer to units will have income restrictions pursuant to regulatory agreements and/or other legally binding documents. The additional market rate housing would financially support the PACT portion and new affordable housing component of the Proposed Project. **EIS Chapter 02.0, “Project Alternatives,”** provides information regarding the capital needs and costs associated with the existing buildings.

As required by the relevant environmental statutes and regulations, the EIS is intended to reasonably assess the foreseeable environmental effects of the Proposed Project, as well as a reasonable range of alternatives to the Proposed Project that are technically and financially feasible, and meet the purpose and need of the Proposed Project, and not to provide a comprehensive cost/benefit analysis of the project.

Comment 19: In the Demolition & Reconstruction plan, new apartments for the NYCHA residents will be smaller than their existing ones, and the developer does not guarantee equivalent bedroom count or apartment sizes. This represents a significant loss for the NYCHA residents. (Bosco_158, Cohen_183, Frame_156,

Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

Response 19: Apartment size is outside the scope of the EIS.

Comment 20: As discussed throughout the EIS, the Proposed Project will replace all NYCHA DUs with new Section 8 DUs on a one-for-one basis. Why not also consider a plan to preserve the current “Towers in the Park” design, which preserves more critical green space in our city and is in keeping with the surrounding neighborhood? (Stern_207)

Response 20: As discussed in **Chapters 05.01, “Land Use, Zoning, and Public Policy,” Chapter 05.07, “Urban Design and Visual Resources,”** and **05.18, “Neighborhood Character,”** the area surrounding the Project Sites has a varied urban character. Towers in the Park are present in the area but are not the predominant built form. Further, as discussed in **Chapter 05.01**, this is now not a widely favored urban development typology. Instead, development with streetwalls, courtyards, and upper floor setbacks above bases is widely considered a better approach to complement traditional building forms, such as those that are prevalent in this area. The Proposed Project development alternatives have been designed with these elements.

Comment 21: To better explain the purpose and need (42 U.S.C. Section 4336a(d)), EPA suggests the document discuss how Section 8 PBVs “Improve the quality of life and housing stability for existing FEC residents.” EPA recommends the document provide information which illustrates the differences between the Section 8 PBVs and current Section 9 DUs, including an explanation of the longevity of the Section 8 PBVs. (Austin_434)

State why NYCHA is not maintaining the FEC buildings [under the current Section 9 operations] as required under FISP, and what immediate plans it has to cure their related Department of Buildings violations. (Holowka_429)

Response 21: As discussed in **Chapters 01.0, “Purpose and Need for the Proposed Project”** and **02.0, “Project Alternatives,”** the RAD program allows public housing authorities to transition their properties from Section 9 housing to a better funded and more stable program called Section 8 PBV. The RAD program requires public housing authorities to preserve all resident rights. NYCHA’s implementation of the RAD program is called PACT, and PACT offers additional rights and protections above and beyond what the federal government requires, and NYCHA retains ownership of the land and buildings. Following the transition to Section 8 PBV, lease agreements automatically renew, residents cannot be evicted without cause, and households continue to pay 30% of their adjusted gross income towards rent. These and other key rights and protections are codified in the new tenant leases, the RAD Statute and Implementing Notices, and other federal regulations. For more information regarding the RAD/PACT program, please see the “Facts about PACT” document [here: https://www.nyc.gov/assets/nycha/downloads/pdf/PACT-facts-english.pdf](https://www.nyc.gov/assets/nycha/downloads/pdf/PACT-facts-english.pdf) and the “PACT Protects Residents Rights” document [here:](#)

https://www.nyc.gov/assets/nycha/downloads/pdf/PACT_ResidentRights_2024_english.pdf. As discussed in EIS **Chapter 02.0, “Project Alternatives,”** Section 9 offer similar protections for tenants, but Section 9 is dependent on allocation from the Federal government through annual Federal capital grants, which have historically declined and failed to keep pace with growing needs. This limits NYCHA’s ability to address capital needs.

Comment 22: The DEIS establishes a future “analysis year” of 2041, projecting conditions as they would exist upon project completion rather than assessing current conditions. This future-oriented baseline is employed to evaluate potential impacts (Lunke_076)

Response 22: The use of a 2041 analysis year is consistent with *CTM* guidance. Per Chapter 2 – Establishing the Analysis Framework of the *CTM*, Section 100, for proposed projects to be completed and become operational at a future date, the environmental setting is the environment as it would exist at project completion and operation. Consequently, future conditions must be projected made for a particular year, generally known as the “build year”. The build year is the year when the project would be substantially operational, since this is when the full effects of the project would occur.

Comment 23: We appreciate the inclusion of an executive summary to give a summary of the purpose and need and the project alternatives. EPA recommends the Final EIS shorten the executive summary to be a plain language summary of the purpose and need, alternatives, impacts, and comparison of impacts between alternatives. Additionally, to allow for a meaningful comparison of impacts between alternatives, EPA recommends the Executive Summary include a table summarizing the impacts to each resource area by each alternative, along with any proposed mitigation to reduce impacts. When relocations are required and where possible, consider opportunities to relocate families with children attending nearby schools within the area served by that same school to prevent disruptions to attendance, learning, and quality of life. (Austin_434)

Response 23: The length of the Executive Summary is a by-product of the scope of the Proposed Project, with multiple alternatives and technical impact areas of concern and that the EIS is prepared pursuant to the substantive and procedural requirements of the NEPA and contains further analysis to comply with the substantive requirements of SEQRA and the New York City Environmental Quality Review (CEQR). The lead agencies do not believe a shortened Executive Summary would be advisable. However, a table summarizing impacts has been added to **Chapter 05.21, “Mitigation,”** and the **“Executive Summary”**; **Table 05.21-1** and **Table 00.0-37**, respectively. Regarding the temporary relocations of up to 120 households, see response to comment 3.7.

Comment 24: [The existing buildings] they are strong, stable foundational buildings and absolutely should not be demolished. Not only is it environmentally a terrible idea, as no matter how many efforts to curb the impact, demolishing them WILL create horrible air conditions, completely kill our much-needed trees, and create noise

and traffic problems for many years. I am wholeheartedly AGAINST demolishing Fulton & Elliott-Chelsea, DO NOT believe in giving city land to private developers (haven't we done that enough and gotten nothing good in return??). (Meinhardt_008)

There is a no-demolition alternative that is entirely feasible, half the price, and it wouldn't turn our neighborhood into a construction site for the next 30 years. The residents of the Fulton/Chelsea Houses deserve well-maintained homes. Demolishing their homes and privatizing the land is a lazy solution in the name of "public housing preservation," and it does not serve the residents of Chelsea. Renovation is a much cheaper solution, but there needs to be a commitment to really do it and do it well. It would be less invasive, less polluting, and better for our neighborhood. Embrace this Non-demolition alternative and let's do that!! (Oddo_009)

My name is Alicia Martinez and I been living in the same apartment for 37 years at Chelsea housing, this is my home, my building is a strong and well made building, I had a fire during the pandemic next to my apartment wall to wall and nothing happened to my apartment why would this companies demolish this building when they are fire proof and earthquake proof. Thank you (Martinez_091)

Response 24:

Comments noted.

Comment 25:

I am against this demolition proposal. The only part of this Environmental Impact Statement that I agree with is the No Action Alternative. Because it is the only option that will keep residents in public housing. (Miranda_035)

One-to-One replacement is often not accomplished in demolition projects. Failure of federal sources of funding to provide for adequate city housing does not exonerate local authorities for managing properties responsibility to avert damage and homelessness in neighborhoods. There are economically and socially feasible means of restoring, renovating, and rehabilitating buildings for improved and sometimes even exceptional environmental & energy performance without displacement of local residents and loss of major structural components. (Sorensen-Allacci_301)

Yes, refurbishing is inconvenient. When our buildings needed new elevators we through the elevator replacement and we survived. When our buildings went through a window replacement we survived. When our buildings went through the HVAC installation, we survived. Nobody had to move out and live in another apartment while this was going on. And we paid for it and we're going to be paying for it for A LONG TIME. Why is NYCHA different? We worked with NYC to keep it affordable refinancing mortgage, refinancing loans, refinancing upgrades and benefitting from NYC grants etc. (Dahill_236)

The analysis unreasonably assumes that similar conditions and needs apply to all of FEC's buildings, despite having been constructed as four separate developments over two decades. It does not indicate what distinguishes any of them from the many NYCHA developments-to say nothing of the city's apartment stock in general-that are successfully upgraded without being fully vacated for three

months. ... Requested information: Indicate the specific locations and extent to which the cited rehabilitation challenges exist in each of FEC's four component developments: Elliott Houses, Chelsea Houses, Chelsea Addition, and Fulton Houses. Indicate whether these challenges were present in other NYCHA developments that have been or are being renovated under the PACT program. Indicate any characteristics that might make the FEC buildings more or less expensive to renovate than typical PACT renovations throughout the city, including any recent roof, elevator, or other repairs, any already- performed asbestos or lead-paint abatement, and original absence of lead-paint. (Holowka_429)

Failure of the DEIS to satisfactorily explain why renovation is infeasible and why market-rate housing must be included In the attached March 8, 2024, letter to Anthony Howard of the New York City Department of Housing and Development, Brent Meltzer, Chief of the Housing Protection Unit of the New York State Office of the Attorney General (OAG), provided comments on the proposal's Draft Scope of Work. (Kites_044, Holowka_429)

Response 25:

As discussed in EIS **Chapter 02.0, "Project Alternatives,"** the No-Action Alternative, which serves as a baseline for comparison of the effects of the other alternatives, does not meet the purpose and need for the Proposed Project. Under the No Action Alternative, the Project Site buildings would continue to be funded under the United States (US) Department of Housing and Urban Development (HUD)'s Section 9 program, limiting the ability to address capital needs in a different manner than they are currently addressed.

Comment 26:

The DEIS references a new goal "to address the critical shortage of affordable housing and housing in general in New York City." It dismisses the Rehabilitation and Infill Alternative requested by CB4 in part for failing to address this new goal, stating: "This alternative would not create enough market-rate housing to financially support the PACT and affordable housing components of the project." NYCHA has stated that no new mixed-income housing revenue may be needed at all, even to cover the cost of demolishing and rebuilding the FEC units, thanks to low-income housing tax credits, bonds, and other financial tools available to the PACT developer. Despite NYCHA's earlier indication that revenue from the proposal's mixed-income component would be invested only into rehabilitation of public housing in the same neighborhood, a commitment of its own Build to Preserve initiative, NYCHA has since stated that all of this revenue may instead go into its general fund for use throughout the city. This too is a new goal not included in the RFP. (Holowka_429)

In order to fully evaluate and compare the alternatives, provide for each a detailed financial analysis showing the expected amount of net mixed-income housing revenue that would ultimately go to:

1. renovation or rebuilding of the FEC developments;
2. the Pact developer;
3. NYCHA's general fund for use throughout the city.

Given Non-Rezoning Alternative 3's feasibility, its advantage in total amenity-space area, and very greatly reduced adverse impacts compared to the other alternatives, why were the others not simply dismissed along with the Rehabilitation and Infill Alternative? (Holowka_429)

Response 26: The information requested in these comments is outside the scope of the EIS.

Comment 27: Provide a detailed, item-by-item cost comparison between the Edenwald Houses renovation and a similar renovation of each of FEC's four developments. (Holowka_429)

Response 27: Cost analyses, including comparative analyses mentioned in this comment, are outside the scope of the EIS.

Comment 28: If NYCHA needs the revenue from market rate housing to support the development of newly constructed NYCHA buildings, it should explain in detail the underwriting of both developments showing capital contributions from the developer and why development without market rate housing is not feasible.

CB4 has repeatedly asked NYCHA for detailed building-condition reports and cost breakdowns justifying the extreme increase in the estimated renovation cost.

Requested information: Provide the previously requested financial details explaining the increase in the estimated FEC renovation cost. Provide detailed substantiation of NYCHA's roughly \$1.2 billion renovation estimate. Demonstrate that the estimate is based on the typical scope and standards for NYCHA's PACT renovations. If the typical scope is exceeded, indicate why and how.

Provide a detailed financial justification for including market-rate housing that explains why no other options are available. (Kites_044, Holowka_429)

Response 28: The information requested in this comment is outside the scope of the EIS.

Chapter 05.01: Land Use, Zoning, and Public Policy

Comment 1.1: MCB4 strongly objected to the Rezoning Alternative's height, density, and land use implications, calling it "incompatible with the 197-a Chelsea Plan" and a driver of segregation between NYCHA and market-rate tenants. (CB4_078)

Response 1.1: EIS **Chapter 05.01, "Land Use, Zoning, and Public Policy"** provides an assessment of the Proposed Project with respect to the Chelsea 197-a plan and discusses how the Proposed Project would generally advance the 197-a Plan's goals. Regarding the element of this comment on segregation, see response to comments 3 and 5.

Comment 1.2: MCB4 strongly challenges the DEIS's conclusion that the proposed redevelopment would result in "no significant adverse land use impacts." MCB4 contends that the proposed zoning changes and building mass directly conflict with the Chelsea 197-a Plan, which emphasizes contextual development, preservation of midblock scale, and respect for neighborhood character. Further, it is out of

scale, both in height and bulk with adjacent West Chelsea Special Zoning district immediately to the west. That Special District has 12 carefully calibrated Subareas with height and bulk controls which has promoted both major redevelopment and preserved the Highline Park, while respecting the existing built context. (CB4_078)

A glaring deficiency lies in the inconsistent application of analytical rigor across various categories, employing disparate parameters that preclude meaningful comparative assessment. Consider the evaluation of land use, wherein the DEIS juxtaposes existing and future multi-family housing scenarios without acknowledging the stark disparities in scale inherent in the proposed action. By equating the mere presence of housing in both conditions, it fallaciously concludes the absence of significant adverse environmental impact. (Lunke_076)

The DEIS itself concedes that “the increased density facilitated by the Rezoning Alternative and the Midblock Bulk Alternative would represent a notable change to the primary study areas.” This admission stands in direct contradiction to its subsequent conclusion of no significant adverse environmental impact. These two statements cannot coexist logically. The dramatic alteration in scale and density undeniably carries significant ramifications for land use, zoning, and public policy. (Lunke_076)

The proposed rezoning project's height and density directly clash with the established goals and objectives of the 197-a Plan, a critical conflict conspicuously absent from the DEIS's analysis. Indeed, the Plan's core tenets are effectively erased, save for a superficial nod to the need for “affordable” or income-targeted housing. The DEIS's assertion that the proposed demolition and reconstruction at two and one-half times the existing density, with significantly taller buildings that shatter the prevailing neighborhood scale, is “generally consistent” with the 197-a Plan's goals is a blatant fabrication, a marketing contrivance masquerading as environmental assessment (Lunke_076)

[T]he assertion that “the Rezoning Alternative and Midblock Bulk Alternative would generally advance the 197-a Plan's goals” stands as a stark misrepresentation of reality. The proposed plan's claim to better unify Chelsea than the meticulously crafted objectives of the Chelsea 197-a Plan is directly contradicted by its own proposals... and the proliferation of lot-line buildings throughout Chelsea threatens to erode its distinctive neighborhood character and the vital open spaces that punctuate the monotonous urban fabric characteristic of midtown. (Lunke_076)

Response 1.2:

As noted in EIS Chapter 05.01, “**Land Use, Zoning, and Public Policy**,” the neighborhood character of the primary and secondary study area is characterized by a range of building heights and massings and development trends in the area. Likewise, there is also a wide range of uses and many mixed-use buildings. Since the publication of the 197-a Plan in 1996, an observable increase in taller and denser buildings interspersed among smaller buildings, both along avenues and in midblock areas has occurred. Under all four of the feasible alternatives, the new buildings, with their mix of high-rise and mid-rise overall heights and their lower-

rise bases and accessory open spaces, would fall within the range of the area's current built environment. As such, and in consideration of the Proposed Project's consistency with other goals of the 197-a Plan, the FEIS finds that the Proposed Project would generally advance the 197-a Plan's goals and therefore would not result in a significant adverse impact with respect to this public policy. Regarding the West Chelsea Special Zoning district, as also noted in **Chapter 05.01**, that area also contains a variety of building forms and heights including the new apartment complex at 76 11th Avenue, adjacent to the High Line, which reaches a maximum height of 36 stories (402-foot roof height). As with new development in the special district, the Proposed Project would result in a range of building heights and, unlike the nearby 1930s London Terrace complex, would include setbacks above building bases and courtyards, some facing the street, containing accessory open space.

Comment 1.3: MCB4 also challenges the DEIS's methodology in defining its study area. For a project seeking Large-Scale General Development (LSGD) status, CEQR typically recommends a ½-mile secondary study area. Yet the DEIS limits its analysis to just ¼ mile. Please detail and provide the rationale for this lesser impact radius, particularly when the project is expected to alter neighborhood-scale zoning. (CB4_078)

Response 1.3: EIS **Chapter 02.0, "Land Use, Zoning, and Public Policy,"** provides a rationale for the selection of the quarter-mile study area boundary used in the land use, zoning, and public policy analysis, which is consistent with *CTM* guidance. The *CTM* does not recommend a specific study area boundary for LSGD projects (*CTM*, Chapter 4, Section 310, "Study Area Definition"), but rather indicates that the size of study area should vary by technical area and the relevant conditions of each project.

Comment 1.4: MCB4 had explicitly requested a 500-year floodplain analysis, especially given the use of federal HUD funds and the applicability of the Federal Flood Risk Management Standard (FFRMS). Please detail and describe how can the project claim long-term sustainability or insurability without a forward-looking climate risk analysis. (CB4_078)

Response 1.4: As noted in the EIS, concurrent with the publication of the DEIS, NYCHA and HPD issued an "Early Notice and Public Review of a Proposed Activity in a 500-Year Floodplain" public notice. Related to this, the DEIS included an "8-Step Decision Process" analysis for the Proposed Project, pursuant to FFRMS. The "Final Notice and Public Review of a Proposed Activity in a 500-Year Floodplain" is being published concurrent with the Notice of Availability publication of the FEIS. Please refer to these documents which are in EIS **Appendix B.2**.

Comment 1.5: The Zoning Resolution's definition of land use, encompassing uses, density, and building bulk, underscores the DEIS's fundamental flaw. The document repeatedly identifies significant environmental impacts within numerous chapters, only to summarily dismiss their significance without providing the requisite detailed justification mandated by environmental law. (Lunke_076)

- Response 1.5:** EIS **Chapter 05.01, “Land Use, Zoning, and Public Policy,”** has been prepared consistent with *CTM* guidance and represents a “hard look” at the effects of the Proposed Project.
- Comment 1.6:** The proposed rezoning project's introduction of commercial uses onto the campuses represents a clear departure from the existing residential and community facilities-only zoning. (Lunke_076)
- Response 1.6:** The Fulton Houses Project Site currently includes commercial overlay zoning along 9th Avenue, permitting commercial retail uses. With the Preferred (Rezoning) Alternative or the Midblock Bulk Alternative, a similar commercial overlay zoning district would be added to 10th Avenue in the Elliott-Chelsea Houses Project Site, a type of zoning designation commonly mapped on wide streets in Manhattan with underlying residential zoning districts. As noted in **Chapter 05.01, “Land Use, Zoning, and Public Policy,”** commercial overlay zoning districts allow local retail uses, which would serve Project Sites residents and others in the surrounding area.

Chapter 05.02: Socioeconomic Conditions

- Comment 2.1:** The DEIS fails to assess how zoning tools like the City of Yes for Housing Opportunity (CHO) or Universal Affordability Preference (UAP) might affect nearby parcels or accelerate displacement pressures. Please detail the cumulative implications of these new citywide policies on East and West Chelsea. MCB4 also notes that the DEIS does not account for the State’s recent removal of the 12 FAR residential cap or the City’s growing use of R-11 and R-12 zoning designations. (CB4_078)
- Response 2.1:** EIS **Chapter 05.01, “Land Use, Zoning, and Public Policy”** and EIS **Chapter 05.02, “Socioeconomic Conditions,”** discuss COY and UAP and the impacts of development under these new public policies on properties within the primary study area. These chapters’ analyses also account for known development projects in the respective secondary study areas. As discussed in EIS **Chapter 06.0, “Indirect and Cumulative Effects,”** the analyses presented in the EIS consider cumulative effects, based on the *CTM* and other applicable guidance.
- Comment 2.2:** Please detail and describe the protections to be put into place to ensure that all residents, not just those with strong advocacy or resources—to successfully return. The DEIS fails to specify the criteria for selecting temporary housing, how vulnerable populations will be accommodated, or how resident needs will be incorporated into relocation plans. (CB4_078)
- Response 2.2:** The EIS **Chapters 02.0, “Project Alternatives”** and **05.02, “Socioeconomic Conditions”** describe the processes and protections for the up to 120 households and for Hudson Guild’s Elliott Center, both of which would require temporary relocations before moving to new permanent accommodations. Any temporary relocation of residents or businesses will adhere to requirements of applicable statutes and regulations, including but not limited to the Uniform Relocation and

Real Property Acquisition Policies Act of 1970, as amended (URA) and implementing regulations at 49 CFR 24, Notice 2016-17; PIH 2016-17, as may be amended from time to time (“RAD Fair Housing, Civil Rights, and Relocation Notice”), Section 18 of the Housing Act of 1937, as amended and implementing regulation, 24 CFR part 970 and all applicable state and local regulations. All other households would move directly from their current NYCHA DU to their new replacement unit. Similarly, all other community facility uses would move directly from their existing spaces into new spaces on the Project Sites. NYCHA and the PACT Partner continue to engage in ongoing consultation with FEC residents to address a range of concerns including temporary relocations, building and apartment design, open space design, property management, safety and security, and social services. Federal regulations provide relocation protections and a right to return. Households that are temporarily relocated will sign a temporary relocation agreement that guarantees the right to return once construction is complete. The temporary relocation agreement also provides additional benefits, including financial support for packing and moving expenses.

Comment 2.3: The DEIS acknowledges that “there is the potential for upward pressure on area rents” (DEIS, 5.2-13) but offers no concrete strategies to mitigate the risk of indirect displacement. Please describe and detail the policies to ensure that long-standing residents in the surrounding area are not priced out due to the influx of new market-rate and mixed-income housing. The DEIS’s conclusion that the displacement risk is not “significant” under CEQR fails to account for cumulative pressures in a rapidly changing housing market. Please describe and detail measures to be taken to preserve affordability for those outside NYCHA, vulnerable to secondary displacement. (CB4_078)

Response 2.3: The analysis presented in EIS **Chapter 05.02, “Socioeconomic Conditions”** determines that the Proposed Project would not result in displacement, including indirect residential displacement, consistent with *CTM* guidance. The analysis determined the socioeconomic conditions study area has already experienced a readily observable trend toward increasing housing prices, and the Proposed Project, which would introduce mixed-income market-rate and affordable DUs, would maintain a more diverse mix of incomes as compared to the future without the Proposed Project. Accordingly, no mitigation measures are warranted for the Proposed Project related to indirect residential displacement. See response to Comment 5.

Comment 2.4: The DEIS offers no guarantees that existing community-serving institutions—including Hudson Guild and Western Beef Supermarket—will remain accessible and affordable on the redeveloped sites. If commercial rents rise or spaces are reconfigured without affordability protections, essential services may be lost to the community. Please describe and detail the commitments to be made to ensure the retention and affordability of these anchor community institutions. (CB4_078)

Response 2.4: Regarding Hudson Guild, see response to comment 2.2. Regarding Western Beef and other off-site businesses and institutions, the indirect business displacement analysis in EIS **Chapter 05.02, “Socioeconomic Conditions,”** determines that the

Proposed Project would not result in indirect business displacement. Accordingly, mitigation measures related to socioeconomic conditions are not warranted for the Proposed Project.

Comment 2.5: Please describe and detail how will NYCHA ensure that the [Elliott] center's community programs remain accessible during this disruption, especially for seniors, youth, and families who rely on its offerings. ... Please describe in detail the plan to ensure the continuity of childcare, youth, and senior services currently provided by Hudson Guild during construction. A new facility be fully built and operational before the existing one is vacated. (CB4_078)

Response 2.5: As discussed in EIS **Chapter 05.02, "Socioeconomic Conditions,"** temporary swing spaces on- and off-site, identified and designed in coordination with the Hudson Guild leadership team, would be provided nearby to accommodate existing programming from the Elliott Center with minimal disruption to operations. The arts, early childhood education, youth development and education, adult services, community building, and mental health programming provided by the Elliott Center would be temporarily relocated to other off-site spaces pursuant to an agreement executed between Hudson Guild and the PACT Partner. In addition, an existing basketball court on the Project Sites along the midblock of 9th Avenue between W. 18th and W. 19th Streets would be temporarily enclosed to facilitate year-round use by Hudson Guild, while the basketball court at the Elliott Center will be unavailable until a new court is provided within the replacement buildings in the first stage of construction. Accordingly, there would be continuity of most services; however, some services of the Elliott Center may be affected temporarily, as acceptable to Hudson Guild. The PACT Partner is committed to the temporary relocation of the Elliott Center and its associated employees and ensuring that the Elliott Center and associated workers return to the Project Site once their new spaces are complete. The Elliott Center would be offered advisory and financial assistance associated with the temporary relocation. Relocation Plans for the Elliott Center would adhere to requirements of applicable statutes and regulations. Also see response to comment 2.2.

Comment 2.6: I am having difficulty understanding how the relocation will work, including where current residents—such as myself and my family—will be moved to. This is especially important for me to understand, as I am a parent of a child with autism who currently attends school upstate. I also work in the city, and it is essential that our new location allows for consistent access to both his school bus service and my place of employment without disruption. Ensuring that our transportation and daily routines remain manageable is crucial to my family's well-being. (Lewis_001)

Interim relocation accessibility has not been addressed, which is an obvious concern. There are no specifics on the number and location of temporary units for temporarily relocated tenants. We worry that NYCHA residents will be temporarily located out of the neighborhood and never be able to move back. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316,

Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

Save our home from future homelessness private developers keep on us investing on our homes that all we have, as low income trying to create homelessness where is the protection of HUD government control HUD Section 9. (Cruz_086)

Where will the current residents be housed? If they are not in NYCHA apartments, will HPD subsidize their rents? (Stamm_246)

Request for Further Analysis in the EIS: The EIS should consider the unique impact of demolishing Chelsea Addition, which will result in many advanced age and disabled seniors being permanently displaced. (Newman et al_260)

From a social stand point, demolishing buildings in a family oriented neighborhood the one I reside in Elliott Chelsea will lead to displacement, disrupt established support networks, and contribute to a sense of instability. (Lugo_321)

How many residents would be displaced, and what specific supports would be in place to ensure they are not permanently uprooted from their communities? (Wolf_264)

Public Housing Demolitions more often than not results in permanent displacement of existing residents. The potential impact of this plan on homelessness is to exacerbate an already overwhelming problem in the city and elsewhere, contributing to loss of quality of life not only for those being displaced and made homeless but also other residents who are reminded daily of the crisis of homelessness and cracks in the quality of government planning. (Sorensen-Allacci_301)

Please reject the current real estate developer's plans for the Fulton Elliot Chelsea NYCHA Houses. I live in the neighborhood and the construction time of 16 to 25 years would be devastating to the neighborhood. It also doesn't solve the housing problem for the community. Instead it displaces people, many of whom are vulnerable seniors. There are other models that need to be studied. (Gross_409)

Not only that, Chelsea, I'm sure that they have a lot of people here that are sick, have cancer, have asthma, they have children who are autistic. Where's all these people going to be for 16 years? You're going to scatter them. In the meantime, these people are going to suffer, they're going to die, because they're leaving their community and their homes. (Velez_066)

The absence of legally binding guarantees that all replacement units will remain permanently affordable, with public oversight, is deeply concerning. (Brahmbhatt_416).

Response 2.6:

As currently designed, up to approximately one hundred and twenty (120) households, or less than six percent (6%) of all 2,056 apartments, would be required to temporarily relocate during the initial stage of the Proposed Project before moving into their new permanent homes. As these households would be temporarily relocated to housing units and then housed in new units upon completion, this would not be considered a “direct displacement” pursuant to

established standards in the *CTM*, but rather housing in different accommodations, as occurs whenever a NYCHA unit is temporarily vacated due the need for unit rehabilitation or major repairs. Information about these temporary relocations is provided in EIS **Chapter 05.02, “Socioeconomic Conditions.”** As stated in that chapter, NYCHA and the PACT Partner must produce a Temporary Relocation Plan that complies with all applicable federal requirements and minimizes the need for off-site temporary relocations.

The remaining ninety-four percent (94%) of households would only move once – directly into their newly built Section 8 PBV DUs in the new Proposed Project buildings (see response to comment 21 for more information on Section 8 PBV housing). Construction of new units would occur at the same time as people are living in their existing units. EIS **Chapter 05.19, “Construction”** analyzes the potential impacts of active construction on the residents on site. The PACT Partner would provide assistance with packing and moving needs for households requiring temporary relocation as well as for all households for their move into their new permanent homes. Federal regulations provide relocation protections and a right to return. Regarding consideration of displacement in the EIS, pursuant to *CTM* methodology, the NYCHA residents of the Fulton and Elliott-Chelsea Houses are considered to live in protected housing and are therefore not considered to be a vulnerable population at risk of displacement as they would be relocated to new housing units as summarized above and described in more detail in EIS **Chapter 05.02**. Also see response to comment 2.2.

Comment 2.7:

We do not want this, we did not ask for this. This is our homes, this is where we live. This is we want to be ourselves. We want to be what we want, not what you want. So I'm just here to support you and do everything you can to stop the gentrification. It's important that you live your lives the way and they live lives the way we want to live, not other people telling us what we should do and how we should live. (Mycklebust_053)

The proposed destabilization of a fragile community comprising low-income seniors and other vulnerable residents, forcing them to endure decades of demolition and construction in their own and their neighbors' homes under the illusory promise of improved living conditions in new, cheaply constructed apartments, will not enhance their quality of life or foster stability. Instead, they will be compelled to demonstrate their worthiness for new apartments with rents and service fees exceeding their current outlays. (Lunke_076)

This is a land and money grab led by wealthy developers incentivized by city policies that benefit the few and displace the many. We call on HPD to uphold HUD and Fair Housing laws that protect low-income residents from displacement and discrimination. (Cruz_087)

You cannot dislocate people! It is socially irresponsible. Fix what exists. (Carton_113)

The development risks reintroducing forms of social and economic segregation by clustering public housing units into specific buildings or floors, separating them

from market-rate tenants. The DEIS leans heavily on public-private development partnerships without addressing the long-term implications of privatizing public land. This is a dangerous precedent for NYCHA's future. ... Moreover, the lack of transparency around financing, rent structures, and the roles of private developers leaves residents vulnerable to future policy shifts or financial instability. (Brahmbhatt_416)

I am opposed to your plan for major reconstruction on the Chelsea -Elliot-Fulton housing complex. Where are the current tenants going to move to?? (Kover_125)

Let's not pretend that this redevelopment doesn't displace, calling it temporary relocation doesn't soften the blow. You are forcing people out of their homes, 120 families in the first phase alone, or as it's called, phase zero, with only a promise that they can come back someday. (Keitt_072)

Response 2.7:

Regarding the relocation of and permanent affordability for existing public housing residents of the Project Sites; as discussed in EIS **Chapter 05.03, "Socioeconomic Conditions,"** the RAD/PACT program legally requires that replacement units be permanently affordable. Similarly, regarding the new affordable housing units, MIH and UAP units are permanently affordable housing that have income restrictions pursuant to regulatory agreements and/or other legally binding documents. NYCHA will continue to own the land, as well as administer the Section 8 PBV subsidy, manage the waitlist and monitor conditions at the Project Sites under the Preferred, Midblock Bulk, Non-Rezoning, and COY Alternatives. The Section 8 PBV DUs would continue to serve low-to moderate income residents, maintain permanently affordable rents, and residents would continue to pay 30 percent of their adjusted gross income towards rent. Residents would not have to pay any additional fees, charges, or utility expenses that are greater than what they currently pay under NYCHA Section 9 and would have automatic lease renewal each year that cannot be terminated except for good cause similar to existing conditions. Residents would also continue to have the right to organize, and resident organizations would continue to receive funding. Also see responses to comment 5.

Comment 2.8:

No evictions! Do NOT demolish any housing whatsoever!!! (ackerperson_084)

Response 2.8:

Comment noted.

Comment 2.9:

We need safety for our family is low income we do wish to remain forever subsidized as is section 9 subsidized - 20 years contract is not secure with market rent private landlord can do what they want rising rents so tenants will go have to go shelter, homeless or dead and government officials have no empathy on white black and brown with not be able to reach the rent again market rate rents please consider the human beings that we all are. Thank you (Cruz_094)

Response 2.9:

See response to comment 5.

Comment 2.10:

By holding 169 vacant units for the relocation of residents whose homes are being demolished, these units become unavailable to residents with transfer needs within

the development. As a result, these residents will be forced to transfer outside of their neighborhood due to lack of vacant units at their own development. While the Proposed Action contemplates a one-to-one replacement of the public housing units at FEC with Project-Based Voucher units, the EIS should consider the possibility that shifting market conditions or other changes over the next sixteen years may render the PACT Partner unable or unwilling to pursue the Project or pursue it on the same terms, meaning that the number of replacement Project-Based Voucher units would be substantially reduced, and FEC residents would be forced to move. (Newman et al_260)

Intra-development transfers will be severely restricted simply because there will not be enough units on-site with vacancies. The demolition of all apartments throughout FEC according to the planned Phasing laid out in the MDA will reduce the number of apartments available to accommodate transfer requests within FEC while residents wait for completion of the Replacement Buildings. This will lead to the displacement of residents. (Newman et al_260)

Request for Further Analysis in the EIS: The EIS should examine data about transfer requests at FEC and apartment turnover rates to determine the impact of such demolition on the ability of NYCHA to accommodate residents' rights and needs. (Newman et al_260)

Response 2.10:

The Proposed Project would accommodate relocation of all existing FEC residents, and none would be permanently displaced, as detailed further in EIS **Chapter 05.02, "Socioeconomic Conditions."**

The request for inclusion of turnover rate data is outside the scope of the EIS. EIS **Chapter 05.02**, evaluates the Proposed Project based on *CTM* guidance, and determined that no significant adverse impacts related to residential displacement would occur as a result of the Proposed Project.

Comment 2.11:

Request for Further Analysis in the EIS: The threshold for analysis of direct displacement should be lowered (currently 500 individuals) so that a full analysis of the direct (and indirect) displacement is conducted. (Newman et al_260)

Request for Further Analysis in the EIS: The EIS should identify the full array of repairs needed over the life of the Proposed Project to ensure residents' health and safety. (Newman et al_260)

Response 2.11:

The threshold for analysis of direct residential displacement is based on the guidance of the *CTM*. A life-cycle repair analysis is outside the scope of the EIS.

Comment 2.12:

What are the impacts upon public health in a community that is already disproportionately impacted? This environmental injustice impacting working class communities of color must be addressed under NEPA's review of socioeconomic conditions. It is not adequately addressed in the DEIS. Neither is the fact that the public housing/ NYCHA residents will be segregated from the market rate tenants. Is this a violation of NYC's "poor door legislation"? (Cahill_271)

Response 2.12: EIS Chapters 05.02, “Socioeconomic Conditions,” 05.17, “Public Health,” and 05.20, “Environmental Justice,” were prepared pursuant to *CTM*, State regulatory guidance on Disadvantaged Communities, and other applicable guidance cited in those chapters and represent a “hard look” at the Proposed Project’s effects on these areas of concern. The respective chapters found that the Proposed Project would not result in any significant adverse impacts to socioeconomic conditions, public health, or environmental justice. The Proposed Project is required to comply with all applicable laws.

Chapter 05.03: Community Facilities and Services

Comment 3.1: The community facilities analysis should use the latest enrollment data and account for cumulative impacts from nearby development. (Bottcher et al_077)

Response 3.1: For the FEIS, EIS Chapter 05.03, “Community Facilities and Services” reflects the New York City School Construction Authority (SCA)’s 2024 Housing Multipliers, which were released just prior to publication of the DEIS. As described in EIS Chapter 05.03, “Community Facilities and Services,” consistent with *CTM* and New York City Department of City Planning (DCP) guidance, the analysis accounts for demand and capacity in the No-Action Alternative based on projections from SCA’s Projected New Housing Starts and the Projected Public School Ratio for the most recent Five-Year Capital Plan, which the SCA develops for its capital planning purposes. The projected demand for seats generated by the Proposed Project is added to the No-Action Alternative to determine future demand with the Proposed Project.

Comment 3.2: Healthcare demand from the proposed project should be assessed. (Bottcher et al_077)

Response 3.2: As described in EIS Chapter 05.03, “Community Facilities and Services,” since the Proposed Project would neither displace an existing health care facility nor create a sizeable new neighborhood where none existed before, an assessment of the project’s effects on health care is not required in accordance with the *CTM*. It also should be noted that the Proposed Project would include the introduction of medical office related uses.

Comment 3.3: Please detail the factors that led the DEIS to conclude there would be no significant impact on school capacity, given that existing schools are already over-enrolled and the project is expected to introduce additional students. (CB4_078)

The section dealing with Chelsea's student population is one glaring example. The DEIS claims that to add 3,454 new residential units to Chelsea under two of the alternatives would only add 129 elementary students and 36 intermediate students. That's an average of just one child for every 21 new apartments. These numbers do not reflect real world conditions. In fact, our neighboring community board CB5 challenged the technical manuals' rates eight years ago, saying they were antiquated and that the true weight is three times higher. These unrealistic low projections create three serious problems. First, they underestimate school impacts.

When schools become overcrowded, educational quality suffers, and our children deserve better. Second, these rates fail to account for important factors like unit size and affordability. The DEIS treats all the units the same. Third, flawed projections lead to inadequate planning. Our schools already oversubscribed and the DEIS basically ignores the impact of new buildings. (Ott_080)

There are no indications for more classrooms or additional schools in the Demolition & Reconstruction proposals. Calculations used to determine how many additional school-aged children would be added to the area with the Demolition & Reconstruction plans were based on a notoriously outdated and inaccurate model, which produced an erroneously underestimated projection of the number of additional students. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

Also, at one of the previous things, an educational expert mentioned that the schools in the area were overpopulated, and that with the new downsizing of sizes, that the schools are completely inaccurate. They're not enough for the existing kids. And what and there is no idea whatsoever, at least in documentation I've seen of how many students are would be going into this complex or are in the complex presently. (Robinson_472)

Response 3.3:

The determination of public schools impacts in EIS **Chapter 05.03, “Community Facilities and Services,”** was based on the criteria set forth in the *CTM* and utilized current and projected enrollment and capacity provided by the SCA. According to the *CTM*, a significant adverse impact to public elementary and intermediate schools may occur if a proposed project would result in both of the following: (1) a utilization rate of the elementary or middle schools that is equal to or greater than 100% in the With-Action Condition; and (2) 100 or more new students generated from the proposed development past the 100% utilization rate.

SCA demographic projections, which are dependent on several factors, such as birth rates, migration of students into or out of the school district, the presence of alternative schools, and school district policy changes, indicate that although schools in Community School District 2, Sub-District 3 are currently operating above capacity, enrollment is projected to drop below capacity for elementary schools and close to capacity for intermediate schools by the 2041 analysis year. In the case of elementary schools, it is expected that even with the 108 students introduced by the Preferred and Midblock Bulk Alternatives, schools would operate with available capacity (i.e., less than 100% utilization rate) in the 2041 analysis year. In the case of intermediate schools, the expected 37 students introduced by the Preferred and Midblock Bulk Alternatives would result in study area intermediate schools operating approximately 47 seats above capacity. Therefore, because the Preferred and Midblock Bulk Alternatives would add less than 100 students (47 students) past the 100 percent utilization rate, no significant adverse impacts on intermediate schools would occur.

See EIS **Chapter 05.03, “Community Facilities and Services,”** for more detailed explanations and data.

- Comment 3.4:** MCB4 requests that the school impact analysis be revised to reflect current 2025 school usage and enrollment conditions, along with updated enrollment projections and cumulative development impacts within the broader adjacent community district. ... The DEIS should account for the anticipated population growth from the Midtown South Mixed-Use Plan. (CB4_078)
- Response 3.4:** The schools analysis in the DEIS utilized the most up-to-date data provided by the SCA at the time of its preparation, which is based on enrollment and capacity in the 2023-2024 school year and accounts for SCA's projections of new housing units in the school district. Furthermore, the analysis in the FEIS was revised to reflect updated school multipliers data (used to determine the number of students generated by the Proposed Project), which was released just prior to publication of the DEIS. Additionally, for conservative analysis purposes and based on guidance provided by SCA, the No-Action enrollment also includes the projected increase in elementary and intermediate school populations resulting from the Midtown South Mixed Use Plan (MSMX).
- Comment 3.5:** Please describe the analysis conducted to understand how demographic changes may impact Title I funding and the diversity of student populations in Chelsea public schools. (CB4_078)
- Response 3.5:** An analysis of Title I funding and the diversity of student populations in Chelsea public schools is outside the scope of the EIS.
- Comment 3.6:** Please detail and describe the rationale for using such a broad geographic area to assess childcare access in the DEIS, and how does this approach account for documented local shortages in the immediate neighborhood? MCB4 requests a revised analysis that uses only district-relevant data to assess real access within walking distance of the redevelopment sites. (CB4_078)
- Response 3.6:** As described in EIS **Chapter 05.03, "Community Facilities and Services,"** the 1.5-mile study area is based on *CTM* guidance and reflects the fact that since there are no locational requirements for enrollment in an Early Childhood Program, many parents/guardians choose a center close to their employment rather than their residence. An analysis of early childcare facilities at the district level or only within walking distance of the Project Sites is outside the scope of the EIS.
- Comment 3.7:** The DEIS fails to address the compounding effect of increased demand across multiple community facilities. Libraries, youth programs, senior services, and after-school care will all increase usage. Please detail the interagency plan for coordination to assess and prepare for the cumulative impact on these vital services. (CB4_078)
- Response 3.7:** As described in EIS **Chapter 05.03, "Community Facilities and Services,"** no impacts would occur to study area libraries (Jefferson Market Library and Muhlenberg Library), given that the increase in catchment area population for these libraries would not exceed the five percent threshold identified in the *CTM*. Also, per *CTM* guidance, this analysis accounts for cumulative effects from other populations. According to *CTM* guidance, analyses of community facilities are

limited to public schools, early childhood programs, libraries, police/fire services, and health care facilities, except in cases where the facility itself is the subject of the Proposed Project or would be physically displaced or altered by the Proposed Project. As that is not the case with the Proposed Project, an analysis of youth programs, senior services, and after-school care, or an inter-agency plan to address increased demand on these services, is outside the scope of the EIS.

Comment 3.8: Hospital capacity. The DEIS simply omits this aspect entirely. Where will folks go when they have a heart attack, when expecting mothers are ready to give birth? (Law-Gisiko_081)

Response 3.8: An analysis of health care facilities is warranted only where a proposed project would create a sizeable new neighborhood where none existed before, or the proposed project would affect the physical operations of, or access to and from, a hospital or a public health clinic. As these conditions do not apply to the Proposed Project, a detailed analysis of hospitals is not warranted under CEQR. The HUD 24 CFR Part 58 Guidance Document, which advises on the preparation of environmental reviews under HUD's NEPA implementing regulations of 24 CFR Part 58 (Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities), indicates that analysis of emergency medical services would be limited to project locations which do not provide adequate access to police, fire and emergency medical services; which do not provide average response time for police, fire and emergency medical services in the area of the project sufficient to meet the needs of the project; and which do not provide the quality of the police, fire protection and emergency medical services available to the project adequate to meet project need. Regarding these criteria, the Project Sites are served by emergency medical care services including those operated by the Fire Department of the City of New York, Bureau of Emergency Medical Services (FDNY-EMS). FDNY-EMS monitors and publishes average response times to emergencies, as required under Local Law 119 of 2013. The sufficiency of emergency medical response times are an issue that the City addresses comprehensively on an ongoing basis. It should be noted that the development alternatives for the Proposed Project include expanded medical office related uses (also referred to as health care).

Comment 3.9: There's no mention of the schools and the amount of the population that's growing and where the schools are going to accommodate those people. (Robinson_018)

On the other major issue in terms of education that I don't think came up in the DEIS, is the current lack of school capacity on the west side. We know that PS 33 is currently far past its 100 percent utilization rate. It's actually at 118 percent. In other schools in the area, including PS 11, PS 51, and PS 12 also exceed the 100 percent utilization rate for this past academic year. And added to this is that the New York City Department of Education needs to be in compliance with the state mandated class size mandate which is a good thing, but it means that under state law by the 2028/29 school year, our kindergarten, the third grade classrooms need to be reduced to 20 students per classroom with grades four to eight, need to go down to 23, and high school classrooms need to go down to 25 students. This is

down from the current cap of 32 students per class, and many of our students are at that cap, a few even exceed it. So despite whatever, you know, projections we have about declining school enrollment. (Healy_049)

Response 3.9:

In accordance with *CTM* guidance, the EIS analyzes the effects of the Proposed Project on public schools in EIS **Chapter 05.03, “Community Facilities and Services,”** using baseline projections of future school enrollment and capacity from the New York City Department of Education (DOE) and SCA. Such projections account for a variety of factors including anticipated future development within the study area in addition to the Proposed Project.

Comment 3.10:

Under the “Preliminary Assessment” section, the description of the Elliott Center omits important spaces: the 96-seat theater used for Hudson Guild events and rented to others for theatrical and dance productions, music recitals, play readings and lectures; an art gallery that is open to the public year round, and a mental health clinic that provides approximately 8,000 counseling sessions annually. These areas are essential components of our programming and serve distinct community needs.

It is stated that “...temporary relocation would not occur until temporary facilities for the Elliott Center are identified in coordination with Hudson Guild...”. We seek clarification that temporary relocation would not occur until temporary facilities for the Elliott Center are complete.

In the second paragraph, it is noted that the Children’s Center and Fulton Center would not vacate their existing spaces. We want to note that ongoing construction might affect the programming in these facilities since they are remaining on the active construction site. We request a Site Safety and Logistics plan that ensures the effects are as minimal as possible or that other remedies are put in place so that programs can continue.

The final paragraph references the “...permanent alteration (enlargement)...” of the community facilities We request clarification on the details of this enlargement, as they are not specified. (Jockers_433)

When they originally presented it to the PTA, they basically presented it as a done deal. That construction, a demolition of the Hudson Guild. Building was going to take place starting in July or August, and we found out that that was not true. Now one thing about Hudson Guild, Hudson Guild houses an afterschool program for many of the students who attend PS 33. And there's been no discussion of what would replace that if Hudson Guild is demolished. The effect on the students and the atmosphere of PS 33 has not been addressed. And has there been any consideration of how many more classrooms are going to be needed? How many more facilities? (Minsle_067)

Response 3.10:

Regarding the facilities and services provided by Hudson Guild, while the description in the DEIS was intended to be illustrative rather than exhaustive, additional information is being provided in the FEIS. Regarding temporary relocation of the Hudson Guild, see responses to comment 2.2 and 2.5. Regarding a site safety and logistics plan, this would be coordinated with other construction management processes including, but not limited to, maintenance and protection

of traffic plans required by New York City Department of Transportation – Office of Construction Mitigation and Coordination (NYCDOT-OCMC), as discussed in the response to comment 19.6. Regarding the enlargement of the community facility space under the Proposed Project, for the purposes of the EIS only a general categorization of expansion space by facility type and area (square footage) are within the scope of the EIS.

Comment 3.11: On page 05.03-6, The first paragraph states that Hudson Guild has a combined capacity of 60 students. This is incorrect. Our 2 combined facilities noted here currently have a total licensed capacity of 162 children with enrollment that varies up to 162. ... In Table 05.03-5 on Page 05.03-12, Hudson Guild's capacities and current enrollments are inaccurate. Although the DEIS acknowledges discrepancies earlier on the same page, it is important to clarify the Guild's current licensed site capacities: Site 2: 22; Site 3: 140, Site 24: 62; Site 26: 90. Enrollments at these various sites vary up to the full licensed capacity. (Jockers_433)

Response 3.11: The childcare analysis in EIS **Chapter 05.03, “Community Facilities and Services”** has been updated per this comment.

Comment 3.12: On page 05.03-23, the first paragraph mentions a 7,685 GSF increase in childcare space on campus. We request determination of whether this space is intended as market-rate child care or free/low cost care based on the anticipated increase in limited-income families on the site. If the space is intended for free/low-cost care, we request a description of how those services will be procured. (Jockers_433)

Response 3.12: This space is intended for publicly-accessible childcare. Information related to the procurement of publicly-funded childcare services is outside the scope of the EIS.

Comment 3.13: Where possible, consider opportunities to relocate families with children attending nearby schools within the area served by that same school to prevent disruptions to attendance, learning, and quality of life. (Austin_434)

Please describe and detail the analysis has been conducted to evaluate the effect of displacing over 3,000 residents and fracturing a deeply rooted NYCHA community. Please provide any studies, if they exist, of comparable large-scale public housing demolitions and tenant relocations that support the claim that such actions do not significantly impact neighborhood character. Please confirm if Hudson Yards and Manhattan West are considered part of the Chelsea neighborhood and included in the study area for this assessment. Please confirm the basis for the assertion that Chelsea is defined by variation, eliminating the need for height limits or design constraints. (CB4_087)

Response 3.13: As discussed in EIS **Chapters 02.0 “Project Alternatives”** and **05.02, “Socioeconomic Conditions,”** while the existing buildings on the Project Sites would be replaced with new buildings, all 2,056 existing NYCHA dwelling units would be replaced in the new buildings on-site on a one-for-one basis and would be set aside for existing NYCHA FEC residents. Accordingly, the existing residents would not be displaced or permanently relocated off-site. As noted in **Chapter 02.0**, for the up to 120 households requiring temporary relocations during

the Proposed Project's first-stage, they would be temporarily relocated either to appropriately sized vacant existing units in other buildings on the Project Sites or, if such units are unavailable, to housing units nearby and then moved into the first new buildings on the Project Sites upon completion. As discussed in EIS **Chapter 05.18, "Neighborhood Character,"** the secondary study area for this technical area is a quarter-mile radius of the Project Sites and as noted in the chapter, "it encompasses substantial portions of the Chelsea neighborhood and the Meatpacking District, as well as the southern portion of the new developed Hudson Yards." A portion of Manhattan West lies within the secondary study area. It is important to distinguish between the "Chelsea neighborhood," which is a colloquial term with an informal definition, and the neighborhood character study area for the EIS. Although there is an overlap between the two, as noted above, they are not synonymous and the area of concern for the EIS neighborhood character analysis is the study area. EIS **Chapters 05.01, "Land Use, Zoning, and Public Policy," 05.07, "Urban Design and Visual Resources," and 05.18** provide information documenting the varied character of the area. The Proposed Project would be subject to controls on height and setback under either existing zoning for the Non-Rezoning and COY Alternatives or under a LSGD for the Preferred and Midblock Bulk Alternatives. Regarding a comparative study of other projects, that is outside the scope of the EIS.

Comment 3.14: The DEIS fails to examine the health care infrastructure required to support the thousands of new residents, workers, and visitors who will occupy the project site. ... This omission is particularly concerning considering the April 2025 closure of Beth Israel Hospital and its emergency room, previously the closest ER to this neighborhood. The community has now lost its only remaining emergency facility in Lower Manhattan. (CB4_078)

Response 3.14: See response to comment 3.8.

Comment 3.15: The Rezoning and Non-Rezoning Alternatives include space for medical offices on the project sites, but the DEIS provides no information about how these will be programmed or selected. Resident input should help shape the use of this space to meet local needs and promote health equity. Please study resident preferences regarding the types of medical practices occupying these offices (i.e., pediatric or family medicine). Please study MCB4's preference for nonprofit organizations affiliated with a network-based NYC hospital over private facilities due to the likelihood of a broader range of health insurance acceptance. (CB4_078)

Response 3.15: The specific programming and operator(s) of the proposed medical office space is outside the scope of the EIS. NYCHA and the PACT Partner will continue to engage residents on site regarding the programming of the medical office space.

Chapter 05.04: Open Space

Comment 4.1: NYCHA’s commitment to making all new playgrounds, courtyards, and recreational areas accessible to the broader community should be formally codified to ensure permanent, equitable access to these spaces. (Bottcher et al_077)

In section 5.4, the DEIS defensively suggests that the net loss of open space under the 3 privileged option that brings Chelsea even further below the City’s planning goals, is not a significant Adverse Impact. I challenge this assumption and request that the DEIS look further into what it would mean for the community for the open spaces on the campuses to be “privatized” and “enclosed” between buildings. Again, I request the DEIS provide comprehensive images and 3D models of all the planned open space so the community can appropriately evaluate the nature of this “improved open space,” and fully understand which populations they will actually serve. (Andre_056)

Response 4.1: As described in **Chapter 05.04, “Open Space,”** the accessory open space on the Project Sites is currently private open space and this will not change as a result of the Proposed Project. The open space analysis determined that the Proposed Project would not result in any significant adverse open space impacts.

Comment 4.2: The rooftop spaces should be designed not only as passive recreational areas but also to include opportunities for urban farming and community gardening. (Bottcher et al_077)

Response 4.2: The proposed design of the rooftop accessory open spaces, which is still evolving, is beyond the scope of the EIS. Currently, ground level accessory open spaces are expected to include community gardens for residents of the Project Sites. NYCHA and the PACT Partner will engage residents on site to further the design and programming of the outdoor spaces when appropriate as design development progresses in the coming years.

Comment 4.3: The DEIS also notes that the existing FEC NYCHA open spaces are often “underutilized due to barriers such as fencing, outdated equipment, and poor visibility” ... MCB4 notes for the record, contrary to that assertion, that the Chelsea NYCHA playgrounds are heavily used by NYCHA and other neighborhood residents. (CB4_078)

Response 4.3: The existing FEC NYCHA open spaces, as shown in Figures 05.04-4a and 4b in EIS **Chapter 05.04, “Open Space,”** were rarely in use when visited during field surveys conducted for the EIS during March 2023 and June 2024 and are primarily comprised of landscaping enclosed by fencing. For open space analysis purposes, and as discussed in EIS **Chapter 05.04,** the accessory open spaces on the Project Sites are not considered public as defined in the *CTM*, as they are not designated for the general public and do not have posted hours. Rather, per the *CTM*, they are assumed to be utilized by existing NYCHA residents.

Comment 4.4: Please describe and detail the justification for not proposing a mitigation strategy to address the projected shortfall [in open space], and how will the unmet need be

managed as the project moves forward. The DEIS's position—that new open space design can compensate for the loss in quantity—does not fully align with established planning principles, particularly the expectation that added density should be paired with expanded open space access. (CB4_078)

The plan for demolition and reconstruction shows a significant loss of public space, especially green space, not to mention loss of sunlight and sky. The open space of the current campuses is healthier for the entire community, as well as the NYCHA residents. (Colon_280)

The plans for demolition and reconstruction show a significant loss of public space – especially green space – not to mention loss of sunlight and sky. Total open space will be reduced from 0.683 acres per 1,000 people to 0.647 acres per 1,000 – already well below the City's goal of 2.5 acres per 1,000 people. Both active (sports, recreation) and passive (sitting, walking) open space would shrink under the demolition and reconstruction plan. Bottom line: there will be less room to breathe, play, and relax in a neighborhood that already falls short on open space. The open spaces of the current campuses are healthier for the entire community, as well as the NYCHA residents. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

I'm vehemently opposed to tearing down the buildings. The amount of sunlight is necessary for people, trees, grass. There is very few park space south of 59th Street. South of the central Park on the west side, Penn South has one of the largest sections of green space, along with the Chelsea Elliott houses that's going to be demolished. That's for us, the people. (Keghlian_065)

I request that the net loss of open space described in section 5.4 be mitigated not to a minimum threshold, but to the level recommended by the City's planning goal. Anything less, given the sacrifice requested of the community for this 15–25-year project that will enrich a private developer and create much new luxury housing, is grossly unfair and unacceptable. (Andre_056)

Under a “No Demolition + Infill” scenario, two of the three publicly accessible recreational playgrounds situated along 9th Avenue in Chelsea would be eliminated and replaced with new buildings. These playgrounds currently form unique, avenue-facing courtyards, contributing to a cohesive urban form with the surrounding residential buildings. They represent some of the most accessible and successful open spaces within the Fulton campus, benefiting from visibility from the avenue to the east and enclosure by residential buildings with windows overlooking them to the north, south, and west. While infill development may be appropriate on other, unstudied sites, the elimination of these vital public recreational spaces warrants serious reconsideration. (Lunke_076)

The loss of community spaces will also reduce the quality of life for residents who depend on them for social interaction and recreational activities. Therefore, any decision to demolish our buildings that are quite strong functional sound complexes must be carefully evaluated, taking into account both the environmental impact and the wellbeing of the families affected. The consideration of alternatives

like renovation should be explored to minimize harm to both the environment and the community. (Lugo_321)

Response 4.4:

As discussed in EIS **Chapter 05.04, “Open Space,”** the study area has an existing shortfall of total, active, and passive open space that would continue under all development alternatives. Pursuant to the *CTM*, the City’s optimal open space ratios and percentage reductions do not constitute an absolute impact threshold and projects that may result in significant quantitative impacts on open space are typically further assessed in the qualitative assessment to determine the overall significance of impact. The deficiency of open space resources in the study area would be ameliorated by several qualitative factors including but not limited to the fact that an additional 554 acres of open space are located outside of but accessible from the study area (including Hudson River Park). Furthermore, the Project Sites would provide approximately five acres of private, accessory open space for existing and future residents of the Project Sites across all development alternatives (refer to **Chapter 05.04** for the specific acreage per development alternative). As compared to the No-Action Alternative, this would improve the connectivity and accessibility between accessory open spaces and the useability of the open spaces by introducing various active and passive recreation facilities. Furthermore, rooftop terraces would also be provided in all replacement buildings in addition to ground level accessory open spaces that would be accessible to each building’s residents. Given the size of the private, accessory open space, its close proximity to new buildings and improved connectivity between accessory spaces, improved useability to building’s residents, and the improved conditions of accessory open space amenities, the potential for significant adverse open space impacts would be offset by these factors. Because there is no significant adverse open space impact identified, no mitigation measures have been identified.

Comment 4.5:

Please describe and detail the operational definition of “private, accessory open space” in this context. Will playgrounds, courtyards, and seating areas be fenced or policed to exclude the broader community? How will this change be implemented? (CB4_078)

The DEIS's description of “open areas for building residents, including playgrounds, a basketball court, landscaping, seating, walking paths, accessory parking, and ancillary areas” stands in stark contrast to its omission of these very uses in the land use analysis, neglecting to calculate their significant square footage. This oversight epitomizes the document's pervasive disregard for existing conditions. Even the accompanying maps perpetuate this deception, presenting a visual narrative devoid of the abundant greenery readily apparent in aerial imagery of the Fulton and Elliott-Chelsea campuses. (Lunke_076)

Although it may be technically accurate that the open green spaces and playgrounds on the NYCHA campuses are not legally defined open park space, they are experienced by the community in just that way. Whether you walk through the campuses on your daily commute, stop to sit on a bench in a leafy corner, or take your young children to play in one of the playgrounds, you are connecting to

the campuses as open space and parks. This lived reality must not be ignored. (Andre_056)

Response 4.5: As described in EIS **Chapter 05.04, “Open Space,”** the *CTM* defines public open space as parks and similar facilities open to the public at designated hours on a regular basis. The private accessory open space on the Project Sites is not designated as public because NYCHA campuses are considered private spaces. As with the No-Action Alternative, the Proposed Project would include private accessory open space for Project Site residents. As shown in the illustrative site plans in the EIS, the courtyards and seating areas would generally not be fenced to improve connectivity between city blocks, but the playgrounds would be fenced for child safety purposes. Small portions of the private, accessory open space would be completely enclosed and would only be accessed by residents of the buildings bordering the open space. At this time, there are no plans for additional policing of these private, accessory open spaces apart from standard security services to be provided throughout the Project Sites.

Comment 4.6: Please describe and detail the measures will be taken to manage this increased demand [for publicly accessible open space] and protect the usability of open spaces for current NYCHA residents? The Board notes that there are no plans to create new public open space as mitigation, despite the worsening space-to population ratio. (CB4_078)

Response 4.6: See response to comment 4.5. As discussed in EIS **Chapter 05.04, “Open Space,”** there are no significant adverse impacts to open space under the Preferred, Midblock Bulk, Non-Rezoning, and COY Alternatives, in consideration of the qualitative assessment provided in the chapter. Therefore, no mitigation measures are proposed for open space. However, the newly-constructed on-site private, accessory open spaces of the Project Sites would substantially improve the quality of on-site accessory open space for use by Project Site residents and their guests and would help offset the demand for publicly accessible open space.

Comment 4.7: Please detail the plan and mechanisms for [on-site accessory open space] improvements to be tracked, measured, and enforced. Please detail the roles NYCHA residents and the broader Chelsea community will play in shaping the final designs and ensuring proposed plans meet actual community needs. (CB4_078)

Response 4.7: Because there is no significant adverse open space impact identified, no mitigation measures have been identified and as such, open space improvement tracking is outside the scope of the EIS. However, NYCHA and the PACT Partner would engage residents on site to further the design and programming of the outdoor spaces when appropriate as design development progresses in the coming years.

Comment 4.8: Please detail and describe the specific initiatives to address these design failures [of existing on-site accessory open space] and make the existing spaces accessible and useable during the proposed 10 to 20-year construction period. (CB4_078)

Response 4.8: For illustrative purposes, EIS **Chapter 05.04, “Open Space,”** provides renderings of courtyards and rooftop terraces, showcasing a side-by-side comparison of these spaces under existing conditions and the Proposed Project. These renderings illustrate major enhancements that would be made to these spaces to make them more accessible and usable for building residents. The accessory open space in the Project Sites would be located in building courtyards and in the area between buildings, and would provide both active and passive amenities, including play areas, community gardens, dog walks, landscaping, shaded lounge areas, seating, programmable lawns, and walkways. Changes to existing on-site accessory open space during project construction would be temporary in nature and represent an interim condition over the construction period for redevelopment of the Project Sites. While some private, accessory open spaces would be temporarily closed prior to the staged opening of new private, accessory open spaces, these temporary closures would not constitute significant adverse construction impacts, as identified in EIS **Chapter 05.19, “Construction.”** It should be noted that, given the private, accessory open spaces do not meet the *CTM* definition of publicly accessible open space (see response to comment 4.3), temporary changes to these resources do not warrant an assessment as would be warranted for publicly accessible open space.

Comment 4.9: Please describe and detail if these proposed new courtyards [would] be sunlit and usable year-round, please describe and detail proposed midblock walkways to be incorporated to support neighborhood connectivity. (CB4_078)

Response 4.9: The requested information is outside the scope of the EIS. Per the *CTM*, project-generated private open spaces are not considered to be sunlight sensitive resources, assessment for shadow impacts is not warranted, and shadows on such open spaces are not considered significant under CEQR. Refer to illustrative open space site plans in **Chapter 05.04, “Open Space,”** for proposed midblock walkways. The proposed new courtyards would be usable year-round. **Chapter 05.05, “Shadows,”** details that it is anticipated that majority of the future open space would receive adequate and direct sunlight throughout the day during the growing season. It is expected that the future open space would be designed and planted with vegetation tolerant of the shading conditions to account for project-generated shadows.

Comment 4.10: Please describe and detail the mechanisms to ensure these institutions [that provide open space programming and community access, such as Hudson Guild] are included in future site planning. (CB4_078)

Response 4.10: The development of the Proposed Project by NYCHA and the PACT Partner would involve their ongoing coordination with Hudson Guild and other stakeholders as warranted. This includes coordination with Hudson Guild on the temporary relocation of its Elliott Center facilities. An example of this would be the temporary enclosure of an existing basketball court on the Project Sites at 9th Avenue midblock between W. 18th and W. 19th Streets to facilitate year-round use while the basketball court at the existing Elliott Center is unavailable until a new court is provided in the new facility that would replace the Elliott Center in

the first-stage building on the Elliott-Chelsea Houses Project Site. A discussion of this has been added to FEIS **Chapter 05.02, “Socioeconomic Conditions.”** However, further details of the coordination process with stakeholders such as Hudson Guild during and after project construction are outside the scope of the EIS. NYCHA and the PACT Partner will continue to engage residents on site to further the design and programming of the outdoor spaces when appropriate as design development progresses in the coming years.

Comment 4.11: Without detailed plans and information regarding the above listed matters, MCB4 finds that the DEIS fails to demonstrate how the proposed redevelopment will enhance open space equity or preserve the quality of life for the neighborhood’s current and future residents. (CB4_078)

Response 4.11: Comment noted.

Chapter 05.05: Shadows

Comment 5.1: As we plan for new housing in a dense and growing city like Manhattan, it’s essential to balance these needs with the preservation of access to sunlight in public spaces.

The DEIS identifies potential shadow effects on Chelsea Park and the PS 33 playground – spaces that provide critical access to sunlight, fresh air, and recreation for residents of all ages. We encourage the development team and project architects to explore design strategies that reduce shadow encroachment, such as building setbacks, stepped massing, and tower orientation.

Architects should be explicitly tasked with finding creative solutions that maximize sunlight on key public spaces throughout the day. With thoughtful planning and design, we can balance the need for new housing with the preservation of light-filled, welcoming spaces that support community health and well-being. (Bottcher et al_077)

Please describe and detail shadows mitigation measures explored to date. Please describe and detail any design revisions or programmatic changes have been considered to minimize these impacts. ... MCB4 notes that the significant adverse shadows impact on Chelsea Park and PS 33 Playground is a critical unresolved environmental matter. These recreational spaces serve as vital community infrastructure, breathing and green space in dense urban environment, particularly for youth. Failure to address sunlight loss will have lasting health and usability consequences for the surrounding community, especially the predominantly low-income population of the adjacent Chelsea NYCHA campuses. (CB4_078)

While the DEIS offers renderings depicting ostensibly generous open spaces within the proposed development, these depictions belie the reality of spaces hemmed in by towering edifices that will inevitably restrict light, air, and physical access. This transformation will be accompanied by a net reduction in on-site trees, with a compensatory increase in street trees whose viability will be compromised by the diminished light and air (Lunke_076)

When considering possible adverse impacts relating to shadows on school playgrounds and in Chelsea Park, consider options to mitigate anticipated impacts, if any, to outside play time and physical activity for children. (Austin_434)

But the DEIS identifies that there are multiple, significant, adverse environmental impacts that are only going to be partially mitigated, or remain unresolved. And to me that's problematic. And the three that stand out to me personally the most, where I had the most concern, was around shadows, historic and cultural resources. And the third one was the construction noise and really the shadows just because of how it impacts families, kids in the park, the schools that exist in the community. (Ortiz_464)

As a Chelsea resident, I am hereby requesting answers from NEPA-ENV/HPD addressing the following environmental impacts as presented in the DEIS, including severe shadow impacts on parks and schools. (Colon_280)

Response 5.1:

Several shadows mitigation measures were explored. One measure, improving lighting for the sports field in Chelsea Park, was determined to be feasible and practicable and is identified as partial mitigation. Apart from this, no other mitigation measures were considered to be feasible, practicable, and effective. First, building design changes to mitigate against shadows impacts to PS 33 Playground and Chelsea Park were explored in consultation with lead agencies. However, they were determined to be infeasible and impracticable as they would result in a failure to meet the purpose and need of the proposed project as defined in EIS **Chapter 01.0, "Purpose and Need for the Proposed Project."** Second, the relocation of recreational amenities within the resources to minimize shadow coverage at both Chelsea Park and PS 33 Playground were considered. In the case of PS 33 Playground, relocation of amenities within the resource was determined to be infeasible due to the playground's small size. In the case of Chelsea Park, it was determined that due to the coverage and nature of the incremental shadows cast by the four feasible alternatives, as well as the lack of currently unprogrammed space within the park, there is no way to feasibly relocate amenities to meaningfully reduce shadow coverage. Replacement and upgrade of existing equipment at both Chelsea Park and PS 33 Playground was also considered. However, both open space resources have undergone substantial renovation work in recent years and, apart from the aforementioned lighting improvements at Chelsea Park, there were no outstanding capital needs identified which would effectively mitigate against shadow impacts. Therefore, although several shadows mitigation measures were explored in consultation with NYC Parks, only the lighting improvements at Chelsea Park were identified as feasible, practicable, and effective, and the shadows impacts to Chelsea Park would remain partially unmitigated, while the shadows impacts to the PS 33 Playground would remain fully unmitigated. Upgrades to lighting at Chelsea Park will be obligations of the PACT Partner that will be memorialized in legally binding documents.

Comment 5.2:

The DEIS asserts that shadows on the High Line, 18th Street Plaza, and Hudson River Park will not substantially interfere with their use yet provides no evidence to support that claim. Community members have repeatedly emphasized the

importance of light in making public spaces safe, welcoming, and vibrant. (CB4_078)

Response 5.2:

Shadows impact determinations to all open spaces were made in consultation with the New York City Department of Parks and Recreation (NYC Parks). As described in EIS **Chapter 05.05, “Shadows,”** and shown in the detailed figures in **Appendix C**, incremental shadows on the High Line would not cover any portion of the resource for more than 30 minutes on any of the four analysis days. The open space’s passive recreational amenities (i.e., bench seating, art, and performances spaces) would continue to receive direct sunlight throughout the majority of the representative analysis days. Additionally, seating locations in direct sunlight would continue to be present throughout various portions of the High Line, which can be utilized in the event a given area is shaded, and a park user prefers an unshaded area. This is consistent with typical usage of this open space resource, as visitors typically pass along all or significant portions of its extents. The High Line is a unique open space situated in a dense urban environment where the development of taller buildings surrounding the park are inherent to its character, and shadows are not uncommon in this location. As such, utilization of the High Line is not anticipated to be significantly impacted by any of the Project Alternatives.

Incremental shadows cast on 18th Street Plaza by the Midblock Bulk Alternative (which casts the longest shadows of the four Alternatives) would occur on three of the four analysis days. On two analysis days, incremental shadows would cover portions of the plaza for approximately 3 hours during the morning. No part of plaza north of its southern tip experience incremental shadows for longer than approximately 30 minutes. Therefore, except for the southern end of the park (which would receive approximately 3 hours of direct sunlight throughout the day), the remainder of the park would receive approximately 4-5 hours of direct sunlight throughout the analysis days. Incremental shadows on the other analysis days would be more limited in duration and coverage, occurring for approximately 33 minutes and 1 hour 15 minutes, respectively. As all portions of the resource would receive at least 4-5 hours of direct sunlight on each analysis day, and at no time would the resource experience total shadow loss as a result of the Midblock Bulk Alternative, a significant adverse impact to utilization of the 18th Street Plaza would not occur. The Preferred Alternative and Rezoning Alternative would result in lesser shadows than the Midblock Bulk Alternative, and thus also would not result in a significant adverse impact to 18th Street Plaza. Refer to EIS **Chapter 05.05** for a more detailed assessment.

Hudson River Park Esplanade would experience incremental shadows from the Midblock Bulk Alternative on two analysis days for a maximum of 19 minutes, and these shadows would be confined to a relatively small area of the open space, which is mostly pavement and does not contain sunlight-sensitive recreational uses. Therefore, utilization of Hudson River Park Esplanade would not be significantly impacted by the Midblock Bulk Alternative, or by the other alternatives, which would result in lesser shadows on this resource.

- Comment 5.3:** Without mitigation, longer shadows in colder months could render Chelsea Park and the P.S. 33 Playground areas unusable during school hours. Please describe and detail plans and mitigation to preserve sun access for children and park users throughout the year. (CB4_078)
- Response 5.3:** See response to comment 5.1.
- Comment 5.4:** Please provide an analysis of the interior daylight impact at PS 33, including classrooms, offices, and other spaces with west- and south-facing windows. (CB4_078)
- Response 5.4:** The analysis of interior daylight conditions is outside the scope of the EIS.
- Comment 5.5:** MCB4 notes that shadow impact modeling relied heavily on seasonal averages and broad open space typologies classifications rather than detailed, time-specific usability studies. Without transparency or proactive planning, the DEIS leaves Chelsea residents with unresolved unmitigated impacts of shadows and the loss of sun in daily life. MCB4 requests NYCHA and its development partners to fully assess seasonal sun access loss, publicly disclose all communications with NYC Parks, and provide shadow mitigation proposals. (CB4_078)
- Response 5.5:** The shadows analysis provided in EIS **Chapter 05.05, “Shadows,”** is consistent with *CTM* guidance, which outlines the methodologies to be used in environmental reviews in New York City. In accordance with the *CTM*, shadows on sunlight-sensitive resources of concern were modeled for four days of the year that are representative of the full range of possible shadows. Also, see response to comment 5.1 above. The remainder of this comment is outside of the scope of the EIS.
- Comment 5.6:** Reducing the impact of shadows would require reducing the size and/or relocating the buildings. Meaningful mitigation must seriously be considered. (CB4_078)
- Response 5.6:** See response to comment 5.1.
- Comment 5.7:** The large-scale buildings proposed by Related will cast hours-worth of shadows per day depending upon the time of year. Human beings, especially growing children, need sunlight to thrive, and so do the trees and plants of the High Line and elsewhere that make our neighborhood livable. In winter, areas in shadow are not only darker but typically measure 20-degrees colder, thus forcing school recess indoors when it could otherwise be held outdoors, shadows would last up to 2 hours and 13 minutes, depending on the season. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)
- The height and density of the proposal is entirely inappropriate for this neighborhood. A 38-story building will cast a shadow on PS 33 and the immediate surroundings. (Connolly_211)
- Where will our students have recess during this process, right? Our outdoor play and physical activity are vital to our kids' development, and we can't afford to lose

that space without a solid alternative, including the shadows that will impact the sun on our outdoor space permanently, right? It's not just during construction, but that's forever. (Lawson_062)

Response 5.7: See responses to comments 5.1 and 5.2.

Chapter 05.06: Historic and Cultural Resources

Comment 6.1: MCB4 has repeatedly questioned the necessity of demolition and as expressed in the April 2025 committee discussion, views the claim that “there is no prudent and feasible alternative” (FEC_00.0 Executive Summary, p. 00.0-13) as inadequately substantiated given the lack of public structural assessments and the premature dismissal of preservation options. Other NYCHA campuses in New York City, deemed historic resources, have used the Federal Historic Tax Credit to provide equity as a source of financing. The impact of that ‘as of right’ financing source must be reviewed and considered. (CB4_078)

Cultural, historic contexts are altered and lost forever, impacting the local sense of place and attachment. (Sorensen-Allacci_301)

Regarding the DEIS, Elliott Chelsea is considered or eligible to be considered a historical resource. I personally hope it's not destroyed, not another Seneca Village, San Juan Hill, Manhattan town, little Syria, et cetera. The list goes on. (Ortiz_068)

Response 6.1: As discussed in EIS **Chapter 05.06, “Historic and Cultural Resources”** and documented in **Appendix D, “Historic and Cultural Resources,”** the proposed demolition of the State- and National-Register of Historic Places (S/NR) eligible Elliott-Chelsea Houses (inclusive of the Elliott Houses, Chelsea Houses, and Chelsea Addition), is subject to review under Section 106 of the National Historic Preservation Act which requires federal agencies to take into account the effects of their undertakings on historic properties, and also requires consultation among Native American Nations, the State Historic Preservation Office (SHPO), and other parties. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties..

In accordance with Section 106, NYCHA and HPD evaluated alternatives or modifications to the Proposed Project that could avoid, minimize or mitigate adverse effects on the S/NR-eligible Elliott-Chelsea Houses. The Section 106 alternatives analysis concluded that there was no prudent and feasible alternative to the demolition of the S/NR-eligible Elliott-Chelsea Houses in consideration of the Proposed Project’s purpose and need. The Section 106 alternatives analysis was provided to the SHPO for review and comment and made available for public review and comment as an appendix to the DEIS. SHPO concurred with the conclusions of the draft Section 106 alternatives analysis that there are no prudent and feasible alternatives to the Proposed Project, which includes the Adverse Effect of demolition of the S/NR-eligible Elliott-Chelsea Houses. An updated alternatives analysis reflecting the addition of the COY Alternative to the Proposed Project’s range of feasible alternatives between the DEIS and FEIS was also

provided to SHPO, and SHPO again concurred, by a supplemental letter dated June 17, 2025. with the conclusion that there are no prudent or feasible alternatives to the demolition of the Elliott-Chelsea Houses (See EIS **Appendix D.1.**)

While the Section 106 alternatives analysis did not evaluate the use of Federal Historic Preservation Tax Credits, it did evaluate a Rehabilitation scenario of a Preservation Alternative, which would access additional funding through a conventional PACT/RAD conversion. That evaluation concluded that the Rehabilitation scenario is not feasible and does not meet the identified purpose and need of the Proposed Project. See full discussion in EIS **Appendix D.1.**

- Comment 6.2:** The conclusion that there is “no prudent and feasible alternative to demolition” of the Elliott-Chelsea Houses is not backed by any independent feasibility study; it relies entirely on NYCHA’s internal assumptions. MCB4 believes this conclusion lacks adequate substantiation. The Elliott-Chelsea Houses are not only architecturally significant but are emblematic of the social mission of mid-century public housing. NYCHA has not made public any condition assessments or side-by-side renovation cost estimates to support its demolition rationale. This assertion raises serious questions and denies the public the data needed to evaluate the claim that rehabilitation is financially unviable. MCB4 requests NYCHA providing a detailed, itemized cost comparison between the PACT renovation underway at Edenwald Houses and a similarly scoped renovation for the Fulton and Elliott-Chelsea Houses and make such a comparison publicly available to inform public understanding on this opaque decision-making process. (CB4_078)
- Response 6.2:** See discussion of capital needs information presented in EIS **Chapter 02.0, “Project Alternatives,”** and the Section 106 review process in EIS **Chapter 05.06, “Historic and Cultural Resources.”** and response to comment 6.1. A cost comparison with other projects is outside the scope of the EIS.
- Comment 6.3:** Regarding the DEIS’s assertion that retaining the Elliott-Chelsea Houses under the No-Action Alternative could itself be considered an adverse historic impact. This is an extraordinary and contradictory claim. The DEIS suggests that allowing the buildings to remain would somehow degrade their historical value, ignoring that their historic merit lies in their original architecture, layout, and social mission—not in the level of modernization. The statement that “the continued deterioration of the Elliott-Chelsea Houses would likely diminish many of the attributes that qualify it for listing” is speculative and misleading. The DEIS does not explain how preserving the physical integrity of a historically significant site could be interpreted as a form of harm. (CB4_078)
- Response 6.3:** This comment has been considered, and the FEIS has been updated to remove this statement.
- Comment 6.4:** The DEIS fails to correct basic factual errors, such as omitting the NYC Landmarks designation of the R.C. Williams Warehouse via its inclusion in the West Chelsea Historic District. Please correct the DEIS to acknowledge this local landmark status. (CB4_078)

- Response 6.4:** The FEIS **Chapter 05.06, “Historic and Cultural Resources”** chapter text and Table 05.06-1 have been corrected to clarify that the R.C. Williams Warehouse is a designated NYC Landmark (by virtue of its inclusion in the West Chelsea Historic District which was discussed in the DEIS text about the historic district).
- Comment 6.5:** Please detail which parties will ensure interpretive signage and commemorative displays are designed, funded, and maintained. Please detail how will the community be involved in shaping these representations of its history. (CB4_078)
- Response 6.5:** Per the Section 106 Memorandum of Agreement (MOA), the interpretive display will be developed by the PACT Partner in consultation with the SHPO and NYCHA.
- Comment 6.6:** MCB4 requests the full incorporation of its original DSOW comments (See Appendix B – Draft Scope of Work: Historic and Cultural Resources). (CB4_078)
- Response 6.6:** The DSOW comments, including those related to historic and cultural resources, were addressed in the referenced DSOW Response to Comments document and, where deemed appropriate by the joint lead agencies, changes were incorporated into the DEIS. The DSOW Response to Comments document is provided in EIS **Appendix A.1.II.**

Chapter 05.07: Urban Design and Visual Resources

- Comment 7.1:** Please detail and describe how 39 story buildings of such [height can] be considered contextual when surrounded by nearby low-rise historic buildings. (CB4_078)
- Modern best practices favor low-rise, mixed-income, human-scale housing. The excessively-tall buildings proposed by Related are distressing to the residents of this neighborhood, and the significantly diminished public outdoor green space is a disgrace. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)
- The DEIS attempts to rationalize the scale of the existing Fulton-Elliott-Chelsea (FEC) campuses by drawing a specious comparison between their building density ratio to open space and that of nearby historic townhouse blocks. While acknowledging the altered form of stacked housing versus horizontal dispersion, it neglects to concede the significantly greater publicly accessible open space per block afforded by the FEC campuses compared to the privately held townhouse blocks. (Lunke_076)
- The tallest buildings are in the middle of 26 street rather than near 10th Avenue. (Connolly_211)
- The “Mid-block Bulk Alternative” for Fulton Houses would precipitate a substantial increase in the height and bulk of buildings along 9th and 10th Avenues. This proposed scale directly contradicts publicly stated assurances that

the avenues would maintain a low-rise character consistent with surrounding non-NYCHA blocks. (Lunke_076)

This architecture style would destroy the neighborhood's charm, aesthetic, and sense of community. Currently, I can see the sky when I look out my window. Basically, more than doubling NYCHA's height would prevent that. It would render my private terrace no longer private and would likely devalue my apartment when I sell. (Nizzari_016)

The scale and density of the buildings in the Demolish & Reconstruct proposals – not to mention they are designed like fortresses abutting the perimeter of the properties – completely changes the character of our neighborhood. Not only do we lose light, outdoor space, grass, trees, and sky, but we will be living in a denser, more claustrophobic and imposing environment. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

Response 7.1:

EIS Chapter 05.07, “Urban Design and Visual Resources,” provides an assessment of the Proposed Project’s effects on this technical area. As noted therein, the new buildings on Project Sites would vary in height and by alternative, with one 39-story building that would have streetwall bases of 9 and 19 stories, and the other buildings of lesser heights, with bases and setbacks, with the shortest building being 12 stories tall. These buildings would be located within a surrounding study area that currently includes a range of low, mid, and high-rise buildings, with varying building forms and lot coverages, including the 36-story 76 11th Avenue and the 60-story 2 Manhattan West. With their use of setbacks above streetwall bases, the Proposed Project buildings would differ from the tower-in-a-park plan without upper floor setbacks of the Project Sites’ existing buildings, a mid-century building form which contrasts with many of the buildings in the surrounding study area. As noted in EIS Chapter 05.07, given the varied built context of the primary and secondary study area, the Proposed Project would not result in significant adverse urban design and visual resources impacts.

Comment 7.2:

Please describe and detail why NYCHA did not include any visual street-views and aerial renderings as requested by MCB4 in the DEIS. Please provide a detailed rationale why no visual presentations of the proposed developments were included in the material presented at the 3 public hearings held by NYCHA to support meaningful public review. (CB4_078)

3D views requested by CB4 but not provided in the DEIS. CB4 requested 30 views from a variety of viewpoints, showing the relationship between existing context and the new construction proposed under the various alternatives, that were not provided. These are critical to evaluate the adverse impact of scale differences between existing, particularly historic, context, and proposed new construction. Requested information: Provide the 30 views requested by CB4 in its comments on the Draft Scope of Work. (Holowka_429)

Response 7.2:

EIS Chapter 05.07, “Urban Design and Visual Resources,” includes illustrative comparisons, i.e., pedestrian eye level views comparing the Preferred and

Midblock Bulk Alternatives with the No-Action Alternative. Aerial views of any of the alternatives and illustrative comparisons of the Non-Rezoning and COY Alternatives are not provided, consistent with *CTM* guidance. The materials and slide presentation at the DEIS public hearings provided an overview of the DEIS and public review process for informational purposes but were not a substitute for the DEIS.

Comment 7.3: The DEIS claims that new buildings will “create cohesive street walls” and better reflect the built environment of the broader area but offers little supporting evidence. The proposed towers would dramatically alter the neighborhood’s human-scale design. The proposed high-rise developments starkly contrast with the current low-and mid-rise structures, which are more integrated into the neighborhood’s fabric, and the proposed facades may not harmonize with the neighborhood’s architectural vernacular. Renderings provided in the DEIS are limited and described as “illustrative only,” fueling further concern about transparency and community engagement in the design process. (CB4_078)

Response 7.3: See response to comment 7.1. Existing buildings on the Project Sites range from 7 to 25 stories (62 to 218.5 feet), and thus some are high-rise buildings, though the current layout of buildings, many without streetwalls, is not consistent with the predominant surrounding neighborhood fabric. Façade materials are outside the scope of the EIS.

Comment 7.4: Please detail the formal mechanisms to ensure meaningful resident influence on design choices. Please detail how other community stakeholders, MCB4, block associations and other community organizations will participate in evaluating architectural coherence and neighborhood compatibility. (CB4_078)

Response 7.4: NYCHA and the PACT Partner will continue to keep residents and local stakeholders informed as design and programming of the Proposed Project evolves

Comment 7.5: The assertion that the new construction will better “reflect the predominant existing built form” is unsubstantiated. MCB4 emphasized the need to “integrate with the existing neighborhood fabric” and avoid overwhelming historic structures through incongruous massing. The DEIS does not address how 39-story towers adjacent to three-story rowhouses can reasonably be considered contextual. It also overlooks architectural features that define the area’s character— such as the use of terracotta façades and masonry detailing—which contribute to the neighborhood’s human scale and visual identity. The proposal fails to incorporate visual planning lessons from nearby areas like the Special West Chelsea District, where zoning was intentionally calibrated to preserve architectural continuity along Tenth Avenue. (CB4_078)

Response 7.5: See response to comments 7.1 and 7.3. The Proposed Project includes one 39-story tower to be located in the middle of the Elliott-Chelsea Project Site. This building would not be adjacent to any three story rowhouses but rather would be surrounded by other Proposed Project buildings of lesser heights to the east, south, and west, and Chelsea Park on the north. Please also refer to the discussion of secondary

study area buildings in EIS **Chapter 05.07, “Urban Design and Visual Resources.”**

Comment 7.6: MCB4 reasserts that the DEIS must include more comprehensive renderings—particularly aerial and street-level views from the northeast, northwest, southeast, and southwest—highlighting the contrast between existing and proposed structures. (CB4_078)

Response 7.6: See response to comment 7.2.

Comment 7.7: Urban design must not be reduced to a checklist item. MCB4 notes the planning process should be more transparent and inclusive, ensuring that the final design respects the local community’s character and accommodates the needs of current residents without contributing to displacement or gentrification. Design is a visual concern and a question of neighborhood identity, livability, and long-term equity. (CB4_078)

Response 7.7: Comment noted.

Comment 7.8: I've been a resident for Hudson Yards for almost 35 years. And the reason why I bring that up is: the other day while riding my bicycle, the wind tunnel from those huge modern monstrosities nearly I had to get off my bicycle and walked the bicycle. The wind was so bad, it was something at a dystopian science fiction movie. This is what they're proposing here. Now, no one is addressing the issue of wind tunnels. (Warren_154)

In addition to that, no one mentioned tonight but we mentioned it the other night, there's wind tunnels. Where you're going from one street to the other, when you're having buildings that are 30, 40 stories, there's wind tunnels. (Robinson_055)

I would like to know if there is an impact study regarding how these buildings will affect the wind (wind Tunnel)? If not there needs to be a study. Can you please provide this information? (Warren_154)

Response 7.8: As stated in **Chapter 05.07, “Urban Design and Visual Resources,”** a pedestrian wind condition analysis is not warranted pursuant to *CTM* methodology because the Project Sites are not located adjacent to or near the waterfront and thus are not exposed to high wind conditions.

Comment 7.9: The other thing too that a lot of people don't realize is between 9th and 10th Avenue, the streets are actually wider than between 8th and 9th. So, there's been no consideration in terms of the design and to look at the streetscape and make the streets narrower, giving more cushion in terms of the buildings. (Robinson_018)

The DEIS audaciously posits that its out-of-scale proposal represents a superior design fit, predicated on the spurious claim that certain proposed edifices will exhibit a more direct alignment with the sidewalk than the existing Elliott-Chelsea Houses. This assertion conveniently overlooks the established sidewalk alignment of the Fulton Houses, revealing a fundamental misunderstanding of the distinct urban design paradigms of the two campuses. (Lunke_076)

The introduction of luxury towers within the NYCHA footprint, without a clear street integration strategy or cohesive public realm improvements, will further fracture the neighborhood's urban fabric. Additionally, there is minimal discussion of infrastructure improvements to support increased density—such as transit upgrades, school capacity, or public services—nor is there meaningful analysis of cumulative impacts on the already overburdened urban systems in Chelsea. (Brahmbhatt_416)

Response 7.9: As discussed in **Chapter 05.07, “Urban Design and Visual Resources,”** it was determined that the Proposed Project would not result in significant adverse impacts to the surrounding streetscape. The construction of new buildings to the lot lines at both the Fulton and Elliott-Chelsea campuses would activate surrounding streets by introducing active ground-floor uses, such as community facility and retail uses, with entrances directly on the surrounding streets. The construction of lot-line buildings would also bring the NYCHA campuses into better alignment with the surrounding neighborhood, given the prevalence of older, mixed-use buildings built to lots lines, which generally feature residential units over ground-floor commercial and community facility uses. There would also be improvements to the streetscapes of the Project Sites, including, but not limited to, new concrete sidewalks and newly planted street trees along all frontages. See also responses to comments 3.3 and 13.5 regarding the assessment of potential impacts to community facilities and transportation.

Comment 7.10: The experience of excessive ground-floor commercial space in Chelsea demonstrates that mere presence does not guarantee sidewalk activation, particularly when vacancy rates are high. Newly constructed commercial spaces often command rents prohibitive for the traditional small-scale entrepreneurs characteristic of Chelsea, while large corporate retailers are increasingly retreating from brick-and-mortar locations in favor of online commerce. (Lunke_076)

Response 7.10: Comment noted.

Comment 7.11: High-rise buildings can dramatically alter urban aerodynamics, redirecting wind from upper floors downward and accelerating it through narrow corridors between structures—a phenomenon already evident at Hudson Yards. This “street canyon” effect increases wind speed at ground level, posing safety risks and reducing walkability. MCB4 requests a comprehensive analysis of potential wind impacts and a commitment to incorporate known design mitigations that reduce turbulence and protect public space. (CB4_078)

Response 7.11: See response to comment 7.8.

Chapter 05.08: Natural Resources

Comment 8.1: Please describe and detail how loss of tree canopy will be addressed in terms of both environmental impact and long-term neighborhood livability. MCB4 requests that the EIS provide a thorough estimate of the number and species of trees to be removed and replanted, accounting for the delayed return of benefits from younger

replacement trees. Please describe and detail the specific commitments will be made regarding replanting mature trees, rather than saplings. Further, MCB4 reiterates its call for an independent urban forestry assessment of canopy loss and replacement strategy. (CB4_078)

Detailed documentation of all trees scheduled for removal, including species and condition assessments. Any trees removed must be replaced with mature trees of appropriate scale to preserve shade and ecological value in this dense urban environment. (Bottcher et al_077)

After reading the open space plan document (FEC05.04 open space, I see that there is plan to relocate the basketball field to directly boarder 428 W 19th St. That space currently have a big tree that is loved by neighborhood residents and provide a good tree view for 428 W 19th St residents. Can you consider to move the basketball field by a bit and leave that tree where it is? (Sun_209)

The project also threatens mature trees and green space, which are vital to urban biodiversity, heat island mitigation, stormwater management, and resident well-being. The DEIS underestimates the ecological value of these existing natural assets and does not present a credible plan to replace or preserve them in situ. (Brahmbhatt_416)

Among the other consequences that I see is that there 370 trees which are destined to be ripped up. And none that I saw of that are going to be planted because there's nothing here that's going to be planted except building, after building, after building. And because of the shade that these large buildings will cause, this is not good for either people and certainly, it's not good for the environment. (Haselkorn_047)

Response 8.1:

The assessment requested in these comments are outside the scope of the EIS. As discussed in the **Chapter 05.08, “Natural Resources,”** the analysis in the EIS has been prepared consistent with applicable Federal, State, and City regulations and policies. As discussed in that chapter, the removal of trees on the Project Sites would not result in any significant adverse natural resource impacts. It should be noted that, as described in the chapter, the Proposed Project must comply with the New York City Street Tree Zoning Amendment and Local Law 3 of 2021.

Chapter 05.09: Hazardous Materials

Comment 9.1:

Chapter 05.09 addresses the potential for hazardous materials at the project sites due to historical land uses. The DEIS notes past activities may have introduced contaminants such as lead-based paint (LBP), asbestos-containing materials (ACMs), and underground storage tanks. It commits to conducting Phase I and Phase II Environmental Site Assessments (ESAs), as necessary, and managing remediation under NYSDEC and NYCDEP oversight during site redevelopment. All remediation would occur according to federal, state, and city regulations, and the project is expected to be enrolled in the NYS Brownfield Cleanup Program. (CB4_078)

Response 9.1: As described in EIS **Chapter 05.09, “Hazardous Materials,”** a Phase I Environmental Site Assessment has been conducted for both Project Sites and Phase II sampling has been conducted for existing building sites Fulton 11 at 401-419 W. 19th Street and Chelsea Addition/Elliott Center at 436 W. 27th Drive; these parcels area are also referred to as the first-stage sites. In addition, a remedial action plan (RAP) has been approved by the New York City Department of Environmental Protection (DEP) for the as-of-right first-stage buildings. The RAP includes a Construction Health and Safety Plan (CHASP) to protect workers and the surrounding community during development activities. The DEP-approved RAP and CHASP can also serve as a template for the RAP and CHASP to be prepared for the later-stage buildings, as required. DEP will retain oversight during site development and will review future Phase II sampling workplans and Remedial Investigation Reports (Phase IIs) required to be prepared by the PACT Partner, as well as any RAPs and CHASPs as required. These will be obligations of the PACT Partner that will be memorialized in legally binding documents and will ensure protection of human health and the environment from known or suspected hazardous materials. The approved RAP is provided in EIS **Appendix G.5**. There is no expectation at this time that the Proposed Project will be enrolled in the NYS Brownfield Cleanup Program.

Comment 9.2: MCB4 requests NYCHA release detailed contamination maps and Phase I/II findings used to support its demolition rationale. MCB4 further requests the applicants describe and detail hazardous materials will be managed during demolition to ensure resident safety, especially given the site’s density and proximity to schools and parks, including a timeline for environmental assessments and community notification. (CB4_078)

Response 9.2: See response to comment 9.1. EIS **Chapter 05.09, “Hazardous Materials”** summarizes the results of the Phase I/II findings and EIS **Appendix G** includes copies of these reports. EIS **Chapter 05.09** also outlines the process that will be followed to ensure that the Proposed Project would not result in significant adverse hazardous materials impacts.

Comment 9.3: These buildings contain asbestos. Demolition of these buildings will result in massive debris. Where will it be disposed? (Law-Gisiko, Haselkorn, Immergut)

The soil contains lead, mercury, cardiant[?], and barium in excess of what is acceptable, which will be exposed when digging. (Law-Gisiko)

Response 9.3: As stated in **Chapter 05.09, “Hazardous Materials,”** based on the age of the existing buildings and visual screening made in the field during preparation of the Phase I Environmental Site Assessments, asbestos containing materials and lead-based paint are suspected on the Project Sites. Additionally, soil and groundwater findings from the Remedial Investigation Report (Phase II) are also summarized in this chapter.

PACT Partner obligations for further site assessment, investigation, remediation, monitoring, and reporting, as warranted, will be obligations of the PACT Partner that will be memorialized in legally binding documents. Each of these steps in the

process will be subject to DEP review and approval. Any DEP-required remedial action must be identified before permits for the demolition of a given building can be issued and, thereafter, a DEP-approved site closure report is required to be issued before a temporary certificate of occupancy is sought or issued by the NYC Department of Buildings (DOB). As set forth in the DEP-approved RAP, proper disposal of all soil/fill material would be undertaken at an appropriately licensed or permitted facility in accordance with applicable laws and regulations for handling, transport, and disposal. With these requirements in place, none of the alternatives, including the Preferred Alternative (Rezoning Alternative), would have the potential to result in significant adverse hazardous materials impacts.

Comment 9.4: But here's the real punchline: after hundreds of pages detailing every excessive contaminant that exists at the site, you know the one thing that is not a problem, mold. The villain of each every NYCHA press release. Mold, the phantom menace blamed for all ills. Mold is found in minute traces in the cellar of only one building at Elliot Chelsea. (Law-Gisiko_081)

Response 9.4: Contrary to the comment, **Chapter 05.09: Hazardous Materials** acknowledges that the current buildings and units on the Project Sites need substantial repair and rehabilitation to address the issue of mold. This would be a challenge to address in the No-Action Alternative. Under the development alternatives, including the Preferred Alternative, the existing buildings would be demolished and replaced with new structures that would fully address the issue of mold in existing buildings. See also response to comment 11.

Comment 9.5: Please explain and detail why DEIS conflates lead-paint abatement issues across all buildings. (CB4_078)

Response 9.5: The EIS includes general descriptions of conditions in the Project Sites' buildings requiring capital repairs. The presence of LBP is one of many items that need to be addressed among the buildings on the Project Sites.

Chapter 05.10: Water and Sewer Infrastructure

Comment 10.1: MCB4 strongly contests the DEIS's deferral of critical infrastructure analysis. The document states that a hydraulic analysis "will be conducted later," even as approvals may advance beforehand. MCB4 requests NYCHA provide detailed explanation why it seeks to proceed to ULURP certification prior to confirming that the existing infrastructure can safely accommodate the increased wastewater and stormwater loads projected by the redevelopment. This deferral of a hydraulic analysis represents a serious flaw in the environmental review process.

Please describe and detail the evaluations have been conducted to determine whether these water systems [at and around the Project Sites] are structurally and functionally capable of supporting the proposed load.

MCB4 requests NYCHA commit to releasing the full hydraulic modeling results and infrastructure assessments prior to the Final EIS is certified.

MCB4 requests the following items, some of which are mentioned in the DEIS but not analyzed, be fully studied and addressed. In summary, the comment discusses the following: hydraulic analysis; water mains assessment; separate sewer system; and blue roofs. (CB4_078)

Response 10.1: Consistent with *CTM* guidance, EIS **Chapter 05.10, “Water and Sewer Infrastructure,”** provides a quantified assessment of the Proposed Project’s effects related to water demand, wastewater generation, and stormwater and sanitary sewage flows. As discussed in EIS **Chapter 05.10**, prior to construction for any of the development alternatives, buildings would be subject to the Unified Stormwater Rule, which sets forth the maximum allowable stormwater release rate from the Project Sites to the combined sewer system. The Project must also obtain DEP approval of a Site Connection Proposal, which restricts the stormwater release rates for all new and redevelopment projects. As part of the Site Connection Proposal application process, under any of the alternatives, the Proposed Project would be required to demonstrate (a) that the existing sanitary system could handle the sanitary flows from the Proposed Project (or whether there will be a need to upgrade the existing sewer system), and (b) compliance with the Unified Stormwater Rule. It is standard practice for DEP to make a determination of compliance with the Uniform Stormwater Rule and approve a Site Connection Proposal at the time of building permit applications to reflect current conditions. As discussed in detail in **Chapter 05.10**, the Project is not expected to have any significant impact on water and sewer infrastructure. A structural analysis of existing infrastructure is outside the scope of the EIS.

Comment 10.2: The redevelopment would significantly increase impervious surface area: rooftop coverage would rise from 34% to 60% at Fulton and 29% to 52% at Elliott-Chelsea, raising the site's runoff coefficient to 0.81. More rainwater will run off than infiltrate, directly heightening CSO risk. Please describe and detail the additional runoff be captured, treated, and prevented from reaching the Hudson River untreated. (CB4_078)

Response 10.2: As discussed in **Chapter 05.10, “Water and Sewer Infrastructure,”** the City’s Unified Stormwater Rule specifies a maximum allowable stormwater release rate of 0.1 cubic feet per second (cfs) per acre or 0.046 cfs, whichever is greater, which represents a significant improvement over existing and No-Action Alternative conditions. The specific measures for achieving these standards would be determined over the course of the development of the Proposed Project and would require approval of DEP, per established hierarchies for preferred stormwater retention methods. See also response to comment 10.1.

Comment 10.3: MCB4 requests NYCHA include in the DEIS an evaluation of the real world performance of the proposed systems and conduct such an analysis final ULURP approvals.

MCB4 requests that NYCHA describe and detail whether innovative infrastructure solutions—such as decentralized, on-site treatment systems or a dual-pipe network to manage stormwater separately—were considered during project planning, and

whether the capacity of the aging infrastructure was evaluated to support such systems. If not, MCB4 further requests a full evaluation of these options, including the feasibility of separating stormwater and sewage flows, as part of the ongoing design process. (CB4_078)

Response 10.3: EIS Chapter 05.10, “Water and Sewer Infrastructure,” provides an analysis of the effects of Proposed Project pursuant to *CTM* guidance. Furthermore, as noted in the response to comment 10.1, the Proposed Project would be subject to requirements of the Site Connection Proposal process and the Unified Stormwater Rule, which require that all new developments satisfy performance benchmarks. Those rules do not dictate which specific measures should be used to achieve the required outcomes but rather establish a hierarchy for preferred methods. The methods to be used for Proposed Project compliance could evolve over time as new technologies are developed or refined. Identification of measures to be employed to comply with these City requirements, such as those mentioned in the comment, is outside the scope of the EIS.

Comment 10.4: The EIS fails to include a district-wide infrastructure capacity analysis. This omission significantly weakens its findings. Additionally, long-term stormwater management depends on consistent maintenance, yet the DEIS does not clarify who will be responsible for system upkeep. Please detail and describe which parties will ensure proper operation of the proposed green infrastructure. Please describe and detail the compliance with DEP standards and monitoring post-construction. Please describe and detail the delineation of those responsibilities between NYCHA and the private development team. (CB4_078)

Response 10.4: EIS Chapter 05.10, “Water and Sewer Infrastructure,” provides an analysis of the effects of Proposed Project pursuant to *CTM* guidance. As discussed in Chapter 05.10, “Water and Sewer Infrastructure,” under the Unified Stormwater Rule, there are construction and post-construction requirements permit requirements for which the permit holder (i.e., the PACT Partner) would be responsible. A district wide analysis is outside the scope of the EIS.

Comment 10.5: MCB4 requests the applicant study an on-site sewage treatment system (i.e., decentralized wastewater treatment), to reduce strain on the City’s aging combined sewer infrastructure and enhance local resiliency, especially during heavy rain events. (CB4_078)

Response 10.5: EIS Chapter 05.10, “Water and Sewer Infrastructure,” provides an analysis of the effects of Proposed Project. The analysis was performed pursuant to *CTM* guidance and determined that the Proposed Project would not result in significant adverse water and sewer infrastructure impacts and accordingly, no mitigation measures are warranted. The requested information in this comment is not necessary to complete the analysis and because the identification of mitigation measures is not warranted.

Comment 10.6: The DEIS offers no innovative approaches to mitigate increased runoff despite alarming evidence. In 2016 alone, our community experienced combined sewer

overflows into the Hudson on over a hundred days. With climate change, intensifying rainfall patterns, this development will further stress an infrastructure already discharging billions of gallons of untreated sewage annually into our waterways. (Ott_080)

Let's start with a sewer, which is quite appropriately serve as a metaphor. The document admits that the redevelopment will increase wastewater significantly but waves that risk of overflowing the combined sewer into the Hudson with the goal of a magician asking us not to check behind the curtain. There is no mitigation plan, just wishful drainage. (Law-Gisiko_081)

I worry that all the extra buildings and the proposed plans will have a very bad impact on our already overloaded sewer system (Hughes_017)

It seems clear that the higher density of the proposed demolition and reconstruction plan will create significant negative environmental impact, including, but not limited to more runoff. Combined sewer overflows into the Hudson could most certainly worsen and flooding already an intermittent problem in Chelsea could also worsen. (Colon_280)

The redevelopment at Fulton and Elliott-Chelsea would more than double the amount of sewage and rainwater run-off going into the City's combined sewer system. When it rains hard, that system overflows - meaning untreated sewage and stormwater spill straight into the Hudson River. The risk of pollution in the river will significantly increase. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

This project will exacerbate the combined sewer overflow (CSO) impacts on water quality and public health in Hudson River Park. Increased flows of stormwater and sanitary sewage from the proposed developments, during times of heavy rain, must be minimized if not eliminated. (Fox_431)

This proposed project must have the capacity to detain all rainwater falling on the buildings and property in a manner consistent with NYCDEP's stormwater management practices, to ensure maximal infiltration, evapotranspiration, filtration and detention included in section 4.9 of the NYCDEP Stormwater Manual. Developers must also ensure consistent post construction stormwater management in Section 5 of the NYCDEP Stormwater Manual to ensure the longevity and proper function of these critical systems. The project should also include on-site sanitary sewage treatment and/or black water storage tanks to ensure that sanitary waste from the new developments is segregated from stormwater outflows at times of increased rainfall. (Fox_431)

What about the sewers? I had an office on 40 at 24th Street between 9th and 10th. And when it rained, my toilet backed up. Add 8,000 more people, more toilets. How much excrement those 8,000 more people, and you don't think that's going into the Hudson River? (Gelb_363)

The redevelopment at Fulton and Elliott-Chelsea would more than double the sewage and rainwater runoff going into the city's combined sewer system. When

it rains hard, that system overflows—meaning untreated sewage and stormwater spills straight into the Hudson River. The risk of pollution in the river will significantly increase. ... There are no plans to handle the additional population and its impact on sewage (Gelb_363)

Response 10.6: EIS Chapter 05.10, “Water and Sewer Infrastructure” and EIS Chapter 05.15, “Greenhouse Gas Emissions and Climate Change” analyze potential wastewater and stormwater effects that may occur as a result of the Proposed Project in accordance with *CTM* guidance and determined that no significant adverse impacts to these technical areas would occur. As required by the NYC Construction Code, a Stormwater Pollution Prevention Plan (SWPPP) would be provided as part of the construction process for the project to address erosion control measures and water quality treatment in accordance with applicable regulations during both the construction and post-construction stages. Also see responses to comments 10.1 and 10.4.

Chapter 05.11: Solid Waste and Sanitation Services

Comment 11.1: While the DEIS outlines regulatory context and estimated volumes, it omits critical design, operational, and sustainability details. It does not address how waste will be handled at the building level nor provide insight into the infrastructure needed to support equitable, clean, and climate-conscious waste management. (CB4_078)

Response 11.1: As described in Chapter 05.11, “Solid Waste and Sanitation Services,” solid waste generated by commercial uses would be collected by private commercial carters, and commercial uses developed under the Proposed Project would be subject to mandatory recycling requirements for paper, metals, construction waste, aluminum foil, as well as metal, glass and plastic containers, and organics. Solid waste generated by residential and community facility uses would be collected by the New York City Department of Sanitation (DSNY), served by existing DSNY collection routes, and subject to the City’s recycling program for organics, paper, metals, and certain types of plastics and glass. The design of waste handling infrastructure within each building, as well as the discussion of broader waste-management issues, are outside the scope of the EIS.

Comment 11.2: MCB4 requests the following to be studied and incorporated into the project design. In summary, the comment discusses the following: trash compactors; indoor trash storage; pneumatic systems; solar-powered equipment; e-waste collection; and forms of trash containers.

Please describe and detail [how] waste [will] be collected from ground-floor retail, community facilities, and residences during this complex transition. Furthermore, the DEIS does not indicate whether floor-by-floor refuse rooms will be installed or if residents will be expected to carry waste across long distances. Please describe and detail the waste infrastructure system to enable recycling and composting at the source, or will residents be forced to rely on outdated and inequitable chute systems? (CB4_078)

- Response 11.2:** EIS **Chapter 05.11, “Solid Waste and Sanitation Services”** provides an analysis of the effects of Proposed Project. The analysis determined that the Proposed Project would not result in significant adverse solid waste and sanitation services impacts. Accordingly, no mitigation measures are warranted. As discussed throughout the EIS, most residents and community facility uses would transition directly to new DUs and space within the new buildings. The up to 120 households and one community facility space that would be temporarily relocated would be moved to existing buildings with existing waste handling practices. The remainder of the information requested in this comment is outside the scope of the EIS.
- Comment 11.3:** MCB4 requests NYCHA and its development partners to make clear, binding commitments to modern, efficient, and climate-forward waste infrastructure, to comply with existing rules, and serve as a leader in environmental design and equity. (CB4_078)
- Response 11.3:** While the Proposed Project would be obligated to comply with NYC solid waste laws, as noted in the EIS, the other requested information in this comment is outside the scope of the EIS. Also see response to comment 11.1.
- Comment 11.4:** The myopic inward focused analysis extends to waste management where the project will generate an additional 78.4 tons of solid waste weekly. Rather than incorporating innovative disposal systems like those implemented at Hudson Yards, the plan simply assumes our overburdened sanitation department will somehow adjust. (Ott_080)
- Response 11.4:** As stated in EIS **Chapter 05.11, “Solid Waste and Sanitation Services”**, the net increase of 78.4 tons of solid waste for the Preferred Alternative and the Midblock Bulk Alternative (the two largest alternatives) is not expected to overburden the DSNY’s solid waste handling services and therefore would not result in a significant adverse impact based on *CTM* impact guidance described in **Chapter 05.11**.

Chapter 05.12: Energy

- Comment 12.1:** The DEIS does not evaluate energy systems at the neighborhood level, analyze the capacity of local substations; nor does it address the long-term feasibility of electrification, grid impacts, or renewable energy integration. This approach treats energy solely as a compliance issue rather than a pivotal element of climate resilience, equity, and affordability. (CB4_078)
- Response 12.1:** The *CTM* advises that EISs include a discussion of the effects of the Proposed Project on the use and conservation of energy, if applicable and significant. Except for projects that may significantly affect the transmission or generation of energy, a project does not need a detailed energy assessment, but its operational energy consumption is often calculated. As such, a neighborhood level analysis is outside the scope of the EIS.

Comment 12.2:

MCB4 requests study of the inclusion of self-sustaining energy plans and on-site renewable energy systems. Benefits of integrating zero-energy or net-zero strategies include:

- Improved energy efficiency
- Reduced energy bills for residents
- Lower environmental impact
- Greater energy security and resilience
- Long-term operational cost savings

As part of study in the DEIS, MCB4 requests that NYCHA and its development partners respond to the following:

- Study that any new buildings be designed as all-electric and net-zero ready.
- Disclose the operational carbon footprint of each of buildings.
- Disclose if Con Edison reviewed whether local substations can absorb the new load without upgrades or service disruptions.
- Study rooftop solar installations and battery storage systems to support on-site renewable energy generation and energy resilience.
- Conduct transparent energy modeling and publicly share the evaluations of all proposed buildings for performance, emissions, and efficiency.
- Describe and detail the measures will put in place to ensure that low-income tenants in redeveloped units are not subject to unaffordable utility costs, particularly if electric heating is used.

A climate-resilient public housing redevelopment must include transparent energy modeling, building system design strategies, and affordability safeguards for current and future tenants. (CB4_078)

Response 12.2:

EIS **Chapter 05.12, “Energy”** provides an analysis of the effects of Proposed Project related to energy. The analysis determined that the Proposed Project would not result in significant adverse energy impacts. Additionally, EIS **Chapter 05.15, “Greenhouse Gas Emissions and Climate Change,”** provides an analysis of the Proposed Project. The analysis, which forecasts the greenhouse gas (GHG) emissions that would be generated as a result of the Proposed Project and assesses the Proposed Project’s consistency with the citywide GHG reduction goal, determined that the Proposed Project would not result in significant adverse impacts related to GHG and climate change as it would be consistent with the City’s GHG emissions reduction goals and laws, as defined in the *CTM*. As also discussed in **Chapter 05.12**, Con Edison is required to maintain its transmission network and plans for changes to energy demand over time. Accordingly, no mitigation measures are warranted. As noted in the EIS, the PACT Partner has committed to fully electrifying building heat and hot water. This PACT Partner commitment will be memorialized in legally bindings documents. Apart from this,

the requested information in this comment is outside the scope of the EIS as such information is not necessary to complete the energy or GHG and climate change analyses and because the identification of mitigation measures is not warranted.

Chapter 05.13: Transportation

Comment 13.1: The operation plans must preserve adequate curbside access for emergency vehicles, paratransit services, and school transportation during all project phases. As suggested by Community Board 4, we strongly advocate incorporating Vision Zero design principles throughout the site plan and associated streetscape improvements to prioritize pedestrian safety. This approach is particularly important given the proximity of educational facilities and senior services in the surrounding area and traffic and pedestrian congestion at multiple intersections. (Bottcher et al_077)

Response 13.1: *CTM* guidance indicates analyses of these issues in environmental review documents are only warranted for projects involving closure of a publicly mapped street for more than 180 consecutive days requiring a Local Law 24 Community Reassessment, Impact and Amelioration (CRIA) approval. The Proposed Project does not involve any such closures. Regarding temporary lane or sidewalk closures that may be proposed during project construction, see response to comment 19.6.

Comment 13.2: MCB4 requests far greater clarity on pedestrian safety around PS 33 and Elliott-Chelsea senior housing during peak construction activity. MCB4 also notes the lack of cumulative coordination with other nearby massive infrastructure projects, such as the Gateway Tunnel and Port Authority Bus Terminal expansion. The cumulative transportation impacts of those nearby adjacent major infrastructure projects must be studied in coordination with any proposed redevelopment of Chelsea NYCHA. (CB4_078)

Response 13.2: The transportation analysis presented in **EIS Chapters 05.13 “Transportation,”** and **05.19 “Construction”** have been prepared pursuant to *CTM* guidance and with the review of the expert agency, the New York City Department of Transportation (DOT). The analyses include a vehicular and pedestrian safety evaluation. Pursuant to CEQR guidance, the transportation analysis accounts for “No-Build” projects that have the potential to affect conditions in the transportation study areas. These include discrete travel demand forecasts for larger developments and a background growth rate that conservatively accounts for other developments and changes. The infrastructure projects mentioned in this comment were determined to not warrant discrete travel demand forecasts for transportation analysis as they would not substantially affect conditions in the study areas analyzed in the chapters.

Comment 13.3: The CB4 Transportation Planning Committee has urged the City and NYCHA to consider transforming 27th Street [aka, W. 27th Drive] into a shared street that prioritizes pedestrians and reduces vehicular speed—a recommendation that remains unacknowledged in the document. (CB4_078)

- Response 13.3:** The Proposed Project is not proposing a shared street for W. 27th Drive. However, as discussed in **Chapter 05.13, “Transportation,”** to better accommodate increased pedestrian demand, portions of the W. 27th Drive sidewalk adjacent to the Elliott-Chelsea Project Sites would be widened by 2 to 2.5 feet.
- Comment 13.4:** Please confirm if the development team or NYCHA have initiated conversations with the MTA to discuss potential enhancements to bus frequency, station accessibility, or crowding relief. Please describe and detail how will the proposed project support safe, efficient transit access for the thousands of new residents and workers who rely on these mass transit lines. (CB4_078)
- Response 13.4:** As discussed in EIS **Chapter 05.13, “Transportation”** and in the Transportation Planning Factors/Travel Demand Factors (TPF/TDF) Technical Memorandum provided in **Appendix H.1**, a detailed analysis of bus conditions is not warranted for the Proposed Project under any of the analyzed alternatives, as the analysis screening thresholds set forth in the *CTM* are not exceeded. Accordingly, the requested information in this comment is outside the scope of the EIS.
- Comment 13.5:** Please include study in the DEIS to assess the combined impact of all proposed development and infrastructure projects in the area will affect local traffic patterns, public transit capacity, and air quality, and clarify whether a cumulative analysis is planned as part of the environmental review. MCB4 has consistently asked for a corridor-wide, neighborhood-level traffic model spanning 14th to 34th Streets and from 8th to 11th Avenues, but that analysis is absent. Without this, the DEIS underestimates both future congestion and transit system stress. (CB4_078)
- Response 13.5:** Please refer to the response to comment 13.2. The analysis in EIS **Chapter 05.13, “Transportation,”** is cumulative as it accounts for traffic from future developments that could affect transportation conditions in the study areas, both through discrete travel demand forecasts and through the inclusion of background growth. Please note, a neighborhood level traffic model analysis is outside the scope of the EIS.
- Comment 13.6:** Please describe and detail the process to determine which intersections receive [pedestrian safety] upgrades, and will those decisions be open to community review. Please describe and detail NYCHA commitment to integrating Vision Zero principles into the final site plan and surrounding streetscape improvements. (CB4_078)
- Response 13.6:** EIS **Chapter 05.13, “Transportation,”** provides a vehicular and pedestrian safety evaluation pursuant to *CTM* guidance. The analysis concludes that there are no pedestrian safety improvements warranted specifically for the Proposed Project. However, as noted in the EIS, DOT, independent of the Proposed Project, is planning to implement measures to improve pedestrian safety in the vicinity of the Project Sites. These include the *Vision Zero Manhattan Pedestrian Safety Action Plan Update*, the 9th Avenue Street Improvement Project (SIP), and 10th Avenue SIP.

Comment 13.7: Also, with 8th Avenue or with 9th Avenue, 10th Avenue, there's the bike lanes and they're redistricting. But when you add the trucks and stuff like that, 8th Avenue is going, I mean, 9th Avenue and 10th Avenue are going to be slivers and it's going to be crazier construction than before. (Robinson_018)

Also, when they talk about the transportation, I see nothing about the bike lanes. The bike lanes actually, which would've been that have been created on Ninth Avenue and Tenth Avenue, that would impact the area. (Robinson_472)

Response 13.7: EIS **Chapter 05.13, "Transportation,"** and the transportation section of EIS **Chapter 05.19, "Construction,"** account for existing and future traffic and pedestrian conditions with bicycle lanes and other improvements implemented by DOT.

Chapter 05.14: Air Quality

Comment 14.1: Outdated boiler plants would remain in operation during phased redevelopment, and interim emissions from these sources could affect future residents in nearby newly constructed buildings. Please describe and detail the measures NYCHA and its partners will take to ensure that interim boiler emissions do not endanger future residents in adjacent buildings. (CB4_078)

Response 14.1: As discussed in EIS **Chapter 05.14, "Air Quality,"** a detailed analysis of all existing boiler plants was conducted to determine the potential for significant adverse air quality impacts. The analysis determined that one of the existing plants requires modifications to its operations and an adjacent new building would require short-term operational restrictions to ensure that significant adverse air quality impacts would not occur with respect to nearby newly constructed buildings. Accordingly, emissions of oxides of nitrogen (NOx) from the Elliott-Chelsea Addition boilers would be limited to a maximum of 45 parts per million (ppm) and the stack height would be increased to a minimum of 145 feet. In addition, no outdoor rooftop amenity spaces would be permitted on the eastern, 13-story portion of the proposed Elliott-Chelsea 1 building, and no air intakes would be permitted within the area of this roof defined as a distance of less than 32.25 feet from the roof's edge facing 9th Avenue and less than 18 feet from the roof's edge facing W. 26th Street. These project improvements, which would be effective prior to occupancy of the proposed Elliott-Chelsea 1 building and until the existing NYCHA boiler plants are taken out of service, will be memorialized in legally binding documents.

Comment 14.2: The DEIS also confirms that one intersection—10th Avenue and 17th Street—exceeds the CEQR threshold for PM_{2.5} under both the Rezoning and Midblock Bulk Alternatives. However, the DEIS dismisses the PM_{2.5} exceedance at 10th Avenue and 17th Street as minor and suggests that no further quantitative analysis is necessary for the Midblock Bulk Alternative due to slightly lower projected traffic volumes. The exceedance of PM_{2.5} thresholds at a high-traffic intersection near the project site is particularly concerning given the presence of vulnerable populations in nearby NYCHA housing and should not be dismissed; it likely

reflects broader air quality issues that remain undetected due to the limited number of monitoring locations in the area. (CB4_078)

Response 14.2:

EIS **Chapter 05.14, “Air Quality”** identified that under the Preferred Alternative and Midblock Bulk Alternative the 10th Avenue and W. 17th Street intersection would exceed the screening threshold for PM_{2.5}, i.e., indicating that a potential for an air quality impact may exist and therefore a detailed analysis is warranted. The detailed assessment for the Preferred Alternative calculated the maximum predicted 24-hour and annual average PM_{2.5} concentration increments for the 2041 With-Action condition under the Preferred Alternative so that they could be compared with the de minimis criteria. Based on this analysis, the maximum predicted localized 24-hour average and neighborhood-scale annual average incremental PM_{2.5} concentrations are predicted to be below the de minimis criteria at the analysis site (as measured in µg/m³). As shown in EIS Table 05.14-3, the maximum predicted localized 24-hour average concentration would be 0.42, as compared to the de minimis criterion of 8.6. As also shown in the table, the maximum predicted localized annual average concentration would be 0.022, as compared to the de minimis criterion of 0.100. Given that the Preferred Alternative’s values are well below the de minimis criteria, the results of the Preferred Alternative detailed analysis can be applied to the other alternatives given that they would result in equal or lower project-generated traffic volumes.

Comment 14.3:

The discussion throughout Chapter 5.14 and Chapter 5.19 relies on the Federal NAAQS and New York City de minimis criteria to make determinations on the air quality impacts. EPA wants to emphasize that compliance with the NAAQS does not necessarily equate to no air quality impacts. It appears that compliance with NAAQS is the determining factor in the conclusion that there are no potential significant impacts on Air Quality due to the alternatives studied. While primary standards provide public health protection, given the population density as well as the concentration of sensitive populations, NAAQS compliance may not fully capture the potential for adverse impacts to this subset of demographics due to long-term exposure during demolition and construction at the proposed site. (Austin_434)

Response 14.3:

The use of the National Ambient Air Quality Standards (NAAQS) in **Chapter 05.14, “Air Quality”** and the air quality section of **Chapter 05.19, “Construction”** as impact thresholds is consistent with Federal guidance and the CTM. As is discussed in **Chapter 05.14**, primary and secondary NAAQS have been established for six major air pollutants: CO, NO₂, ozone, respirable PM (both PM_{2.5} and PM₁₀), SO₂, and lead. The primary standards represent levels that are requisite to protect the public health, allowing an adequate margin of safety. The secondary standards are intended to protect the nation’s welfare, and account for air pollutant effects on soil, water, visibility, materials, vegetation, and other aspects of the environment. The primary standards are generally either the same as the secondary standards or more restrictive. Per 40 CFR 50.2, “National primary ambient air quality standards define levels of air quality which the Administrator judges are necessary, with an adequate margin of safety, to protect the public

health.” According to the US Environmental Protection Agency (EPA) “NAAQS Table” webpage, <https://www.epa.gov/criteria-air-pollutants/naaqs-table>, last updated on December 16, 2024, “Primary standards provide public health protection, including protecting the health of “sensitive” populations such as asthmatics, children, and the elderly.” Therefore, consistent with guidance from DEP, and EPA’s NAAQS Table, the NAAQS are appropriate impact threshold standards. It should be noted that, consistent with the *CTM* Chapter 1, Section 222, the lead and expert agencies consider other factors when evaluating the significance of an impact, including its probability of occurrence, its duration, its irreversibility, its geographic scope, its magnitude, and the number of people affected. Considering these factors, and the conservative methodologies used to estimate pollutant concentrations, the results of the operational and construction air quality analyses for the Proposed Project show that it would not result in a significant adverse air quality impact.

Comment 14.4: What are the projected impacts of this plan on air quality in the surrounding area? (Wolf_264)

Response 14.4: EIS Chapter 05.14, “Air Quality,” and the air quality section Chapter 05.19, “Construction,” analyzes effects that would occur as a result of the Proposed Project in regard to air quality during operational and construction conditions, respectively. The analyses determined that no significant adverse air quality impacts would occur with the implementation of project improvements/project components related to the environment (PCREs) which will be memorialized in legally binding documents.

Comment 14.5: EPA suggests the discussion in the Air Quality section should include further description of the modeled incremental increase in concentrations between the no action and the proposed project. Disclosing this information would support a more comprehensive understanding of the changes in air quality due to the project. In addition, EPA suggests that mitigation be appropriate to meet the potential adverse impacts due to the selected alternative in the Final EIS. (Austin_434)

Response 14.5: Incremental pollutant concentrations due to the Proposed Project are reported in EIS Chapter 05.14, “Air Quality,” and EIS Chapter 05.19, “Construction.” Also, see response to comment 14.1.

Comment 14.6: We believe that the school would need aired purifiers in all classrooms. They said that they would have purifier or air sensitivity to test as we go, but what happens when it does go bad? And is that being conducted by an outside party or is it theirs? (Lawson_062)

Response 14.6: As described in EIS Chapter 05.19, “Construction,” measures would be taken to reduce pollutant emissions during construction of the Proposed Project in accordance with all applicable laws, regulations, and building codes. These include the use of ultra-low sulfur diesel (ULSD) fuel, dust suppression measures, abatement of all ACM, idling restrictions, and diesel equipment reduction. In addition, construction of the Proposed Project would utilize newer equipment (e.g.,

equipment meeting the US EPA Tier 3 emission standard) and best available reduction technologies (e.g., use of diesel particulate filters) to further reduce air pollutant emissions. With the implementation of these emission reduction measures, the analyses determined that no significant adverse air quality impacts would occur during the construction of the Proposed Project. Therefore, additional measures, such as the use of air purifiers, are not required to be implemented avoid air quality impacts during the construction period.

Chapter 05.15: Greenhouse Gas Emissions and Climate Change

Comment 15.1: To contribute meaningfully toward municipal carbon reduction targets, the environmental review should incorporate energy self-sufficiency measures and on-site renewable generation capabilities. (Bottcher et al_077)

Response 15.1: As discussed further in the detailed analysis provided in EIS **Chapter 05.15, “Greenhouse Gas Emissions and Climate Change,”** the Proposed Project would be consistent with the City’s GHG emissions reduction goals and laws, State emissions reduction legislation, and City and State policies and regulations regarding adaptation to climate change. For example, the Proposed Project will achieve the energy efficiency requirements of the 2020 New York City Energy Conservation Code (NYCECC), which is designed to ensure meeting the City and State’s GHG reduction goals of 80% and 85%, respectively, by 2050. The Proposed Project would also use electricity for heat and hot water systems, and the PACT Partner may also explore other potential clean power sources as design plans progress.

Comment 15.2: It seems clear that there are environmental advantages and drawbacks to all the proposed alternatives—most notably, new construction buildings can be made more energy efficient and fully electric but demolishing old materials and replacing them with new ones is ultimately more carbon-intensive. Please describe and detail the means and methodology to quantify this proposed carbon tradeoff. (CB4_078)

The DEIS lacks robust analysis of the environmental costs of demolition versus rehabilitation. Studies consistently show that retrofitting existing buildings is often more sustainable than new construction, particularly when factoring in embodied carbon and construction waste. The wholesale demolition of structurally sound NYCHA buildings contradicts basic principles of climate-responsible design. (Brahmbhatt_416)

Response 15.2: EIS **Chapter 05.15, “Greenhouse Gas Emissions and Climate Change”** provides an analysis of potential GHG and climate change impacts from the Proposed Project. This was prepared pursuant to *CTM* guidance and in context of applicable State and City regulations discussed in the chapter. Please see the chapter for a description of the analysis methodology and enumeration of the quantitative and qualitative effects of the Proposed Project. As indicated by the chapter, the Proposed Project would not result in significant adverse greenhouse gas emissions and climate change impacts.

- Comment 15.3:** While the DEIS notes the potential benefits of housing density near transit, it does not attempt to quantify the emissions savings associated with more residents living in well-located multifamily housing rather than in car-dependent areas. Please describe and detail the means and methodology to quantify this benefit especially when comparing full-site redevelopment to infill alternatives. (CB4_078)
- Response 15.3:** The requested quantification is outside the scope of the EIS. However as noted in **Chapter 05.15, “Greenhouse Gas Emissions and Climate Change”**, the analysis provides a conservative assessment of project emissions since it does not quantify emissions savings due to transit-oriented development, as noted by the commenter.
- Comment 15.4:** MCB4 requests NYCHA and its partners to undertake a comprehensive lifecycle carbon analysis that reflects the embodied carbon of demolition and construction materials, the operational efficiency of new buildings, as well as the operational efficiency of re-clad existing buildings, and the avoided emissions from smart growth. (CB4_078)
- Response 15.4:** Pursuant to *CTM* guidance, the requested quantification in this comment is outside the scope of the EIS. However as noted in **Chapter 05.15, “Greenhouse Gas Emissions and Climate Change”**, the analysis provides a conservative assessment of project emissions since it does not quantify emissions savings that would be achieved from the factors noted by the commenter.
- Comment 15.5:** Please describe how much of any increased monthly energy cost resulting from all-electric building systems will be passed on to residents, and what measures will be taken to ensure long-term affordability. (CB4_078)
- Response 15.5:** The information requested in this comment is outside the scope of the EIS.
- Comment 15.6:** The replacement of an existing open space, with its established landscape of 370 mature, decades old trees, with a new landscape that fails to preserve these vital environmental resources does not negate the significant environmental impacts. Newly planted landscaping cannot replicate the carbon absorption capacity of established urban forest clusters and buildings (Lunke_076)
- Response 15.6:** An analysis of microscale effects on greenhouse gases such as carbon absorption by trees is outside the scope of the EIS. However, the EIS includes an assessment of greenhouse gas emissions and climate change factors. Further, it should be noted that as part of the City’s Builder’s Pavement Plan process, new buildings developed under the Proposed Project would be required to comply with street tree requirements of the NYC Zoning Resolution and other applicable laws and regulations (see also response to comment 8.1).
- Comment 15.7:** MCB4 requests the DEIS study the inclusion of an independent, third-party consultant with expertise in urban sustainability and green building be retained for the duration of the project. (CB4_078)
- Response 15.7:** The information discussed in this comment is outside the scope of the EIS.

Comment 15.8: Chelsea is a flood-prone area, yet the DEIS fails to provide a compelling resilience strategy for sea-level rise, increased rainfall, and heat waves— factors that will intensify over the project’s lifespan. There is little integration of Passive House or net-zero strategies, green roofs, district energy systems, or meaningful urban cooling strategies. (Brahmbhatt_416)

Response 15.8: As discussed in EIS **Chapter 05.15, “Greenhouse Gas Emissions and Climate Change,”** the Proposed Project would incorporate various measures and comply with statutory requirements to meet resiliency and sustainability benchmarks. For example, the Proposed Project would conform with the NYCHA Sustainability Agenda and NYC Local Law 97’s 2050 GHG emissions limits in 2050.

Chapter 05.16: Noise

Comment 16.1: I am writing to strongly oppose the proposed demolition of the Fulton and Elliott-Chelsea NYCHA developments as outlined in the Draft Environmental Impact Statement (DEIS) Elliott-Chelsea Housing. I do not expect to live for 16 years, but for how many years I do live I do not want them to be in the middle of noisy, unhealthy construction that will take place if you allow Fulton and Elliott-Chelsea housing to be torn down and replaced with luxury towers. (Cohen_186)

Response 16.1: Comment noted.

Chapter 05.17: Public Health

Comment 17.1: This demolition will cause illness to our community, this will be another 9/11 tragedy and residents will be displaced because they won’t be able to breathe the toxic air. (Lara_210)

Response 17.1: **EIS Chapter 05.17, “Public Health”** provides an analysis of public health pursuant to *CTM* and other applicable guidance and represents a “hard look” at the effects of the Proposed Project. The analysis found that the Proposed Project would not result in any significant adverse public health impacts.

Comment 17.2: The DEIS concludes that the proposed redevelopment of the Fulton and Elliott-Chelsea Houses would not significantly harm public health. It bases this conclusion on the findings of other technical areas, such as air quality, noise, hazardous materials, and water infrastructure, and asserts that no further analysis is necessary. While the DEIS acknowledges that construction noise under the Rezoning Alternative would result in significant adverse impacts to three schools – P.S. 33, Avenues: The World School, and The James Baldwin School – as well as the exterior of the daycare center at Hudson Guild, it minimizes these impacts by citing soundproofing upgrades and comparing the projected levels to urban norms. Yet a noise increase of over 21 dBA at P.S. 33 represents more than doubling in loudness, likely disrupting learning, concentration, and mental well-being, particularly for young children. These disruptions are not adequately addressed as a matter of public health. (CB4_078)

Response 17.2: As discussed in EIS **Chapter 05.17, “Public Health,”** while the predicted interior noise levels would constitute significant adverse construction noise impacts at some locations, construction would not result in chronic exposure to high levels of noise, prolonged exposure to noise levels above the 85 dBA public health noise impact threshold specified by the *CTM*, or episodic and unpredictable exposure to short-term effects of noise at high decibel levels. Accordingly, these construction noise effects do not constitute public health impacts per *CTM* guidance.

Comment 17.3: Please provide a comprehensive plan outlining how the physical and health-related accommodation needs of NYCHA residents – particularly seniors, individuals with disabilities, and medically vulnerable individuals – will be met throughout all phases of redevelopment. This plan is expected to include: a guarantee that all temporary and permanent relocation units will match or exceed existing accessibility features (e.g., ADA-compliant bathrooms, grab bars, ramps, proximity to elevators); consultation with residents and medical professional during relocation planning to ensure continuity of care and housing function; a commitment that no resident requiring medical or mobility-related accommodation will be moved until a comparable or superior unit is available; and transparent tracking and reporting of accommodation requests, fulfilled modifications, and grievance resolution processes. These commitments must be enforceable and included in legally binding agreements between NYCHA, its PACT Partners, and oversight agencies to ensure compliance with the Americans with Disabilities Act (ADA), the Fair Housing Act, and local Human Rights Law. (CB4_078)

Considering the multi-year construction schedule, there should be a transparent, enforceable construction management framework with robust community coordination mechanisms. The development team should follow the recommendations of Community Board 4 to establish clear oversight structures ensuring all disruptions remain within regulated thresholds, create a dedicated community relations office with 24/7 multilingual support services, implement automated notification systems for service interruptions, and develop comprehensive safe passage plans with protected pedestrian routes near construction activities. (Bottcher et al_077)

Response 17.3: See response to comment 5 regarding the legal requirements related to relocation of residents and Hudson Guild community facilities, including the requirement for Temporary Relocation Plans. In addition, EIS **Chapter 02.0, “Project Alternatives”** refers to the legally binding documents that would memorialize the obligations of the PACT Partner. In addition, any statutory requirements not covered by such documents, but which are legally applicable to the Proposed Project, would remain equally applicable.

Chapter 05.18: Neighborhood Character

Comment 18.1: The existing buildings blend with the residential housings between 9th and 10th Avenues. I urge your board to reconsider the renovation option for the sake of the children, elderly, and infirm. If you choose to demolish the existing Chelsea Elliot

buildings, I urge you to build back to the original scale. Or to a few additional floors(similar to Penn South’s 21 floors). (Reyes_103)

Response 18.1: Comment noted.

Comment 18.2: The FEC residents lose the light, air, open space, and greenery that their campuses were designed to maximize, and the wider community gets to watch its neighborhood character destroyed. Just look at the renderings of Chelsea's proposed streetscapes in the DEIS. (Holowka_429)

The DEIS concludes that the Proposed Project “would not result in significant adverse impacts related to neighborhood character” under any build alternative. This determination is made despite acknowledging that the project would cause significant adverse effects to historic resources, shadows, and traffic conditions. The DEIS defines Chelsea’s defining characteristic as “variation,” and argues that because the existing Elliott-Chelsea Houses “are not consistent with the surrounding Chelsea neighborhood,” their demolition does not represent a significant disruption to the area’s identity. However, as the CEQR TM states, “because a neighborhood’s character is perceived and contextual, this judgment may be more subjective than in other technical areas.” If neighborhood character is inherently subjective, then the DEIS’s assertion that the project will not harm it is likewise subjective – and no more authoritative than contrary asserts by community members, including those who view NYCHA’s architecture and social history as essential to Chelsea’s fabric. (CB4_078)

The Chelsea Historic district, which is adjacent to the Fulton Campus, is mentioned once in the DEIS, and incorrectly at that. The block of 24th between 9 & 10th is mentioned as being part of it, which it is not. It is notable, regrettable and unacceptable that the new building on the Fulton 11 site will tower over the historic Cushman row on 20th street (part of the Chelsea Historic District and likely block all sunlight to those backyards. The DEIS asserts that the Rezoning, Mid-Block and Non-Rezoning plans would result in no significant adverse impacts on neighborhood character. That is both an absurd and offensive assertion. The authors of the DEIS try the patience of the readers when they claim that these massive 39-story plus towers are consistent with our low-rise neighborhood character, and particularly with the landmarked brownstone blocks directly behind it and across the street and adjacent to it. Shall we do a poll to see who in the neighborhood agrees? The Chelsea 197a plan spells out several core principles of our neighborhood character, and all three of the privileged demolition alternatives in the DEIS egregiously violate them. There is nothing contextual in size, density or massing of these proposed buildings. (Andre_056)

Response 18.2: As discussed in EIS **Chapter 05.18, “Neighborhood Character,”** the *CTM* advises that “a significant impact identified in one of the technical areas that may contribute to neighborhood character is not automatically equivalent to a significant impact on neighborhood character” and furthermore advises that “neighborhood character impacts are rare.” The chapter considers the character of the secondary study area and its place in the Chelsea neighborhood and finds that “the Project Sites do not on their own constitute a “defining feature” of the

neighborhood as defined in the *CTM*. They are one of many components in the area's heterogeneous composite, but they do not constitute a major element of the area's overall character, i.e., they do not typify a characteristic that helps them define the neighborhood's identity and give the area its "personality." Accordingly, the chapter determined that the Proposed Project, including the replacement of all existing buildings on the Project Sites, would not constitute a significant adverse neighborhood character impact. See also response to comment 1.2.

Comment 18.3: A development of this magnitude demands thorough contextual assessment within our historic neighborhood, a critical perspective, absent from this DEIS. Our community fabric consists primarily of four story historic brownstones preserved through contextual zoning we fought to establish nearly three decades ago. These structures already suffer facade damage from existing traffic vibrations. The proposed towers will not only cast literal shadows over our neighborhood, but directly threaten treasures like Cush Monroe, which will literally have demolition and construction in its backyard. (Ott_080)

Repair, don't destroy the existing human scale buildings and trees to be replaced by a behemoth monstrosity. The people in Chelsea need light and air. The proposed new buildings will destroy the neighborhood. (Santore_132)

Response 18.3: EIS Chapter 05.18, "Neighborhood Character" analyzes potential impacts that may occur as a result of the Proposed Project and determines that the Proposed Project would not result in significant adverse neighborhood character impacts.

Comment 18.4: This is a community. How could you say there's no major impact when the community is going to be destroyed? That is a major impact. It's going to be the community existing in the public housing in NYCHA will be destroyed, and it will have an impact in the community around. This is not what we want. This is not the way we want any kind of future to be. We want to be together, and if we need rehab, we'll do the rehab. Okay? (Lazaran_054)

I am with several neighbors questioning the rebuilt structure. I hear plans for three 39-story buildings, but nobody in the neighborhood wants a building that tall. Since we are used to building in Fulton being 25 (or so) stories). Replace those with buildings of the same size; that should satisfy the neighbors' fears. (Solem_419)

Response 18.4: Comments noted.

Chapter 05.19: Construction

Comment 19.1: The construction plans must preserve adequate curbside access for emergency vehicles, paratransit services, and school transportation during all project phases. (Bottcher et al_077)

Response 19.1: As detailed further in EIS Chapter 05.19, "Construction," although development of the Proposed Project would result in temporary losses of curbside lanes, these

would be in conjunction with NYCDOT-OCMC permits and would not result in significant adverse impacts to adjacent uses, including emergency vehicle access, paratransit service access, or school transportation access lanes. Additionally, a variety of measures would typically be implemented to ensure public safety during construction of the Proposed Project, including, but not limited to, sidewalk bridges, safety signs, safety barriers, flag persons, and safety nettings.

Comment 19.2: Continuous construction-phase air quality monitoring with real-time data accessibility for community members should be utilized throughout the entire redevelopment timeline. This level of transparency is essential for maintaining public trust and ensuring compliance with health standards during all construction activities. The project should establish continuous noise monitoring networks, develop formal complaint resolution procedures for affected residents, provide public access to real-time noise level data, and create an enforceable Noise Management Plan prioritizing community health protection. (Bottcher et al_077)

Response 19.2: As detailed in EIS **Chapter 05.19, “Construction,”** a Community Air Monitoring Program (CAMP) would be implemented for ground disturbance activities associated with the Proposed Project to ensure that the applicable air quality thresholds would not be exceeded during the peak construction periods of the Proposed Project.

As discussed in EIS **Chapter 05.21, “Mitigation,”** source and path control measures implemented as PCREs during construction of the Proposed Project would go beyond NYC regulations to minimize noise emissions to the maximum extent possible. The robust noise control program and measures will be implemented during construction of the Proposed Project to minimize noise emissions to the maximum extent practicable. The Proposed Project would provide a community liaison officer and establish mechanisms for documenting and addressing construction related complaints and issues raised by NYCHA residents on the Project Sites during construction. These obligations will be required of the PACT Partner and incorporated into legally binding documents.

Comment 19.3: In line with the request of Community Board 4, we ask for firm commitments regarding interim repairs during the multi-year redevelopment process and seek explicit clarification on demolition scheduling relative to ULURP completion. This information is vital for residents to understand construction phasing and any potential temporary relocation requirements. (Bottcher et al_077)

Response 19.3: As detailed in EIS **Chapter 05.19, “Construction,”** the expected schedule, methods, and means for construction, while developed with an experienced NYC construction manager, are illustrative and were conservatively chosen to provide a reasonable worst-case scenario for potential impacts. See response to comment 11 regarding interim repairs, which are happening independent of the Proposed Project, a brief description is provided in that response and in EIS **Chapter 02.0, “Project Alternatives,”** for informational purposes and as context. Further information regarding interim repairs may be found here: <https://www.fultonelliottchelsea.com/bridge-plan>.

Comment 19.4: The environmental document must thoroughly explain procedures for managing hazardous materials during demolition activities to protect resident safety, especially for those occupying adjacent buildings during construction phases. (Bottcher et al_077)

Response 19.4: See response to comment 9.1. As detailed in EIS **Chapter 05.09, “Hazardous Materials,”** all project construction activities, including demolition, must be carried out pursuant to DEP-approved reports, including RAPs. This obligation also will be memorialized in legally binding documents.

Comment 19.5: MCB4 requests detailed study of effects of sustained noise exposure on local schoolchildren, seniors, and medically vulnerable residents, especially in a multi-phase project expected to last over a decade. MCB4 further notes its experience with construction of Gotham West, a full block vacant site on West 44th to West 45th, 10th to 11th Avenues. Comprising 4 large buildings with 1238 apartments, the site surrounded PS 51, then on West 45th Street, just west of 10th Avenue. The original plan left the school in place during construction. However, as construction proceeded, the construction noise and vibrations created conditions intolerable and hostile to learning. On an emergency basis, the 314-seat elementary school had to be relocated, on an emergency basis, by the School Construction Authority to a temporary site on the Upper East Side. That relocation included a full school busing plan. Such needs resultant from unmitigated construction noise must be studied and remedied to avoid such future emergency action. (CB4_078)

Even with the noise-mitigation measures described in the DEIS, interior noise levels during demolition and construction would still exceed the acceptable thresholds for residential and community facilities uses. We have many concerns about the impact on the students at P.S. 33 during demolition, including their physical safety, the air quality, their access to open space, and much, much more. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

The noise level would negatively impact learning at PS 33 and The Avenues. (Connolly_211)

What are the projected impacts of this plan on noise pollution in the surrounding area? (Wolf_264)

Noise pollution obviously being a real concern. How will that be mitigated, especially during the school day and how will their learning be protected? (Lawson_062)

Response 19.5: The construction noise analysis presented in EIS **Chapter 05.19, “Construction,”** is consistent with *CTM* guidance. Construction of the Proposed Project would be required to follow the requirements of the New York City Noise Control Code (also known as Chapter 24 of the Administrative Code of the City of New York, or Local Law 113) for construction noise control measures. Additionally, construction of the Proposed Project would incorporate noise control measures that go beyond those required by Code. Specific noise control measures would be

incorporated in noise mitigation plan(s) required under the New York City Noise Control Code to be available for review by a DEP inspector upon request. These obligations will be required of the PACT Partner and will be memorialized in legally binding documents. The EIS has disclosed that despite these measures, under all feasible alternatives the Proposed Project would result in unavoidable adverse impacts on certain receptors, including facades at three public schools, including Avenues the World School at 259 10th Avenue, PS 33, Chelsea Prep at 281 9th Avenue, and James Baldwin School at 335 W. 18th Street.

Comment 19.6:

It is important to clarify that PS 138, a District 75 school, is co-located within the PS 33 building because it serves students with significant cognitive, developmental, and physical challenges. These students require specialized transportation, accessible infrastructure, and additional safety accommodations that must be considered in all construction planning and mitigation measures. (CB4_078)

MCB4 requests a safe passage plan to be developed and publicly reviewed, including protected crossings and signage near high-risk areas such as schools and Hudson Guild. (CB4_078)

14D bus, which goes to Chelsea Piers, will also have to be rerouted because that's going through the development. (Robinson_055)

Please describe and detail how pedestrian access be maintained around active construction zones, especially for those with disabilities, strollers, or mobility devices. Please describe and detail the commitments will NYCHA and its development partners make to preserve curb space for emergency vehicles, Access-A-Ride, and school buses during each phase of redevelopment. The document's lack of a construction logistics plan puts residents at unnecessary risk. (CB4_078)

Response 19.6:

As discussed in EIS Chapter 05.19, “Construction,” the Proposed Project would be subject to various requirements for planning and coordination that is intended to minimize the effects of the Proposed Project construction, including on schools. This includes, but is not limited to, maintenance and protection of traffic (MPT) plans subject to review and approval by the NYCDOT-OCMC. MPT plans ensure protection of workers and roadway users, including motorists, pedestrians, cyclists, and any users with special needs for construction activities affecting sidewalks or travel lanes. This would occur as project construction plans are advanced and such plans are based on specific details of construction, rather than the preliminary conceptual plans presented in the EIS. See also response to comment 13.1. In addition, the Project Team has initiated consultations with the leadership and Parent-Teacher Association (PTA) groups of local schools on a variety of issues of concern and these communications will continue, which can provide an additional means for coordination with the schools as project construction advances.

Comment 19.7:

Please describe and detail the measures to be taken to monitor and mitigate airborne particulate matter, diesel exhaust, and dust throughout the construction

period. Please describe and detail the measures NYCHA and its partners will take to ensure that interim boiler emissions do not endanger future residents in adjacent buildings. MCB4 requests a complete construction-phase air quality assessment, continuous monitoring protocols, and public access to air quality data for the duration of the redevelopment. ... MCB4 requests that the DEIS include specific monitoring and mitigation plans for air quality, pest control, and environmental health safeguards at both school sites (PS 33 and PS 138). (CB4_078)

MCB4 requests that the DEIS include specific monitoring and mitigation plans for air quality, pest control, and environmental health safeguards at both school sites (PS 33 and PS 138). (CB4_078)

The noise and the toxic plumes from demolishing toxic building materials in a densely populated residential area are absolute health hazards that will increase rates of everything from cancer to hearing loss throughout swaths of West Chelsea (affecting rich and poor alike - just in case you only care about rich people - we all have to breathe air). (Fischer_323)

Response 19.7:

EIS **Chapter 05.19, "Construction,"** provides information on measures that would be used to reduce air emissions during construction. Regarding interim boiler emissions, please refer to the response to comment 14.1. Regarding pest control, as discussed in EIS **Chapter 05.19**, before the start of construction, the contractor would survey and bait the appropriate areas and provide for proper site sanitation. During construction, the contractor would carry out a maintenance program, as necessary. Signage would be posted, and coordination would be conducted with appropriate agencies. Also see response to comment 19.2 which discusses the CAMP that would be implemented during construction, and response to comment 9.1 regarding hazardous materials.

Comment 19.8:

The impact of the proposed Casino construction, which would be slated to begin during the pendency of the Fulton, Elliott- Chelsea project. (Brown_085)

Also, when they talk about the area that's being affected, they don't talk about the other areas that are going to be under construction, like Hudson Yards, the West Yards, that will be doing construction and its impact on this site. So there are many construction sites that are pending that are not taught. (Robinson_472) When you deal with Environmental Impact Statement, you're dealing with the two I'll say the two units, but you're not dealing with all the other construction that's being done concurrently at the same time. So right now, we're at the footsteps of Hudson Yards. If they were doing the 5,000 units there, or doing the casino, or doing the platform, all those things will have impact here. (Robinson_055)

Response 19.8:

As discussed in EIS **Chapter 05.19, "Construction,"** the Proposed Project's construction effects would be localized, confined largely to streets surrounding the Project Sites. Likewise, the effects of projects located on other streets would not contribute to construction effects on the Project Sites. Cumulative effects within the Proposed Project are discussed below in response to comment 19.21.

Comment 19.9:

There is no air quality study that has been performed yet. There is a good chance that demolition of 70 plus year old buildings could release asbestos and other contaminants that could impact local residents and two schools. (Connolly_211)

I want to start by stating that I support Alternative 2, the Rezoning Alternative. This proposal offers a much-needed opportunity to improve residents' living conditions while helping to address our community's affordable housing crisis. However, I do have serious concerns regarding the environmental and human health impacts associated with the demolition and construction phases of this project, particularly the risks to air quality. The buildings in this area are located very close to one another, and I am especially concerned about the potential exposure to dust, debris, and airborne particles generated by demolition. My concern is heightened by the fact that I have two aging parents with health problems, who reside on the first floor of our building, and given the existing air conditioning installations and minor window openings, there is a real risk that these particles could infiltrate our living space. This could present serious health hazards, especially for individuals with respiratory conditions or asthma. (Alvarez_014)

The environmental impacts presented in the DEIS would be harmful, with construction projected to continue for 16 to 30 years. Think of all the dust! Naturally I'm thinking of the dust floating up to my area, the area just west of the Theater District. (Yong_208)

Response 19.9:

EIS Chapter 05.19, “Construction” analyzes effects that may occur as a result of the Proposed Project in regard to air quality during construction. It determined that the Proposed Project would not result in significant adverse construction air quality impacts with the implementation of PCREs. Also see response to comment 19.2.

Comment 19.10:

Given that work will generally begin at 7:00 AM and end at 3:30 PM on weekdays, with a potential for extended hours (p. 05.19-8), these shifts may consistently overlap with the time during which children are in school. Noisy school environments can negatively impact a student's ability to concentrate and learn. Implementing practicable noise mitigation measures at local schools can help prevent potential disturbances in concentration and learning due to noise during the construction period and promote healthy and productive learning environments. (Austin_434)

EPA understands that there will be significant impacts to a number of resources as a result of construction and that mitigation measures are being undertaken to reduce those impacts. EPA suggests that the Final EIS discuss how community feedback has been incorporated into the various mitigation developments. For example, the plans for noise mitigation measures at the various sensitive receptors, i.e. schools, directly adjacent to the construction zones. (Austin_434)

Additionally, the noise and heavy machinery involved in demolition will disturb the daily lives of residents, affecting their wellbeing. (Lugo_321)

And then, the construction noise; thinking about that, I think that could really be disruptive to the quality of life of the tenants, and for the students in the school and the community ...The that there was construction in house kitchen development,

affordable housing and there was a school on the same block, and how disruptive it was, so much so that the school had the students had to relocate temporarily. It's just it's just something to consider and think about much more seriously. And I think that if these things remain unresolved, that they're unacceptable. (Ortiz_464) We're particularly concerned about the project's impact on vulnerable community institutions and open spaces, including P.S. 33 Chelsea Prep (grades Pre-K-5), which is directly adjacent to the Elliott-Chelsea campus, and The Avenues School (grades Pre-K-12), both of which are within immediate range of the proposed construction. The DEIS clearly states that construction under Alternatives 2, 3, and 4 will result in significant adverse noise impacts. Given the proximity of these schools and the extraordinary duration of the work, please describe and detail the specific mitigation measures that will be implemented to protect students, teachers, and learning environments from the cognitive and behavioral consequences of chronic, disruptive construction noise exposure. Given these concerns, we recommend prioritizing Alternative 5, which avoids significant noise impacts. Please describe and detail why has NYCHA not prioritized Alternative 5, the Rehabilitation and Infill plan, the only alternative that avoids these significant noise impacts. (CB4_078)

It is important to consider whether young children within the project area will be in the homes and exposed to unacceptable noise levels for an extended duration. Mitigation measures should seek to reduce residential exposure to construction noise in the houses and within the local community. (Austin_434)

Construction will produce levels of sound that exceed normally acceptable threshold, and yet the plan rolls forward as if silence could be subsidized. (Law-Gisiko_081) Having also dealt with all the recent construction in Chelsea (on 8th Avenue between 23 & 24, finally done; on 8th Ave and 25th, still being worked on; on 8th and 26th, still worked on), the noise and tiresome, endlessly construction work from these singular projects tells me how this is nothing compared to this insane proposed project for Fulton & Elliott-Chelsea. (Meinhardt_008)

The demolition and construction would bring with them excessive noise and toxic fumes, which would seriously affect quality of life and health. (Nizzari_016)

“During demolition what will happen to my HEARING as one after the other 24 buildings are demolished. Right now I have NO issues with my hearing. Will I need hearing aids ? Surgery? & who is liable ? The developer ? NYCHA? & then my LUNGS. Will I have non allergic asthma ? COPD? cancer? no issues now but after exposure- repeated-over & over ...same questions as above- liability & monetary compensation will I be residing in clouds of toxic dust ? “ (Shanley_342)

I'm extremely concerned about the quality of life. We as current residents will have to endure the construction, the noise pollution, the air quality, the area restrictions. And we have all the space, and with construction we'll be limited on our ability to move around. (Gadsden_050)

this proposed demolition threatens all of that for me, for so many of us. 25 years of construction, noise starting at 7:00 a.m., dust in the air, ambulance stuck in traffic. That's not progress. That's crisis. Just last week, I had a lupus flare up

triggered by stress and sun exposure. EMS had to be called to my home. And I asked, what happens when roads is blocked, when dust and noise make it worse, when they're very when they're very when the very place I moved to for health reasons and healing, became a danger to my life? (Ighomuaye_052)

There are environmental and public health risks from unchecked construction, pollution, and infrastructure strain. (Cruz_087)

Our block, 20th between 8th and 9th avenues, has been unduly burdened with a nearly ten year revamp of PS 11 which has brought terrible homelessness and rampant drug use into our area — and *still* has not been resolved. The idea of now adding this project which will bring only more noise, traffic, and god-knows-what-else is unacceptable. (Winter_089)

In addition to living nearby, my children attend PS 33. They have three more years to go, before they can be safely removed from the impending environmental hazards of toxic fallout from demolition, the noise level, and the shadow effect. (Reyes_103)

In addition to the relocation hardship for existing tenants, the entire surrounding area, residential and business, will be subjected to noise, toxic chemicals. traffic and bus relocation for years. (Kover_125)

And, as has been noted, the dust, noise, pollution, etc., will diminish the quality of life for all residents of Chelsea, for however long it may take, to change forever the face of what we have come to know and love. (Marsh_374)

Demolition of buildings create potentially hazardous and toxic impacts on surrounding neighborhoods and beyond due to noise, air pollution, traffic, sidewalk detours, disruption in services, stress and potential relocation (planned or otherwise) arising from construction. (Sorensen-Allacci_301)

Demolition in communities with families can have significant environmental and social impacts which need to be carefully considered the environmental consequences of demolition include increased waste, air and noise pollution, and the disruption of local ecosystems. Materials from demolished buildings often end up in landfills, contributing to waste and the depletion of resources. Dust and debris will pollute the air, impacting both public health and the surrounding environment. (Lugo_321)

Construction estimated to last for at least 16 years is going to lead to people seeking to transfer offsite to accommodate health issues exacerbated by construction. These households will not be able to remain in their community, and there are no NYCHA public housing developments in the half-mile study area. (Newman et al_260)

Response 19.10:

See responses to comments 19.2 and 19.5 Regarding Alternative 5, the Rehabilitation and Infill Alternative, as discussed in EIS Chapters 02.0, “**Project Alternatives,**” and 05.22, “**Rehabilitation and Infill Alternative Analysis,**” this alternative is infeasible.

- Comment 19.11:** The noise attenuation expected to be provided by insulated glass windows and walls at PS 33, the James Baldwin School, Avenues of the World School, and any other schools or community-based organizations within the project area should be tested/determined to confirm the mitigation is observed during the construction phased of the proposed action. Schools should be consulted and involved with any noise monitoring plans and activities. Staff should be well-informed regarding mitigation practices, including but not limited to keeping windows closed during construction periods to ensure the noise attenuation provided by the insulated glass window barriers is realized. (Austin_434)
- Response 19.11:** EIS **Chapters 05.16, “Noise”** and **05.19, “Construction”** analyze noise, vibration, and related effects impacts that may occur as a result of the Proposed Project during operational and construction conditions, respectively, in accordance with *CTM* guidance.
- Comment 19.12:** I strongly recommend that NYCHA and its development partners consider implementing full building coverings during both the demolition and construction phases. A great example of this can be seen at the Louis Vuitton store on 57th Street and Fifth Avenue, where a full scaffolding wrap was installed to contain dust and debris during renovation. I believe a similar approach here would significantly minimize exposure to harmful airborne particles, helping to safeguard both residents and the broader Chelsea community. (Alvarez_014)
- Response 19.12:** The specific types of scaffolding is outside the scope of the EIS. See also, EIS **Chapter 05.19, “Construction,”** which determined that the Proposed Project would not result in any significant adverse construction air quality impacts.
- Comment 19.13:** I am also astonished and dismayed to learn in section 5.19-69 that 41% of the 960 construction workers at the site will be driving personal vehicles to and from the job, and will expect to park on the adjacent streets, as parking on the site will be limited to tenants. There will be a daily increase in demand for 338 parking spots. The DEIS notes that “This demand could potentially contribute to, or result in, off-street parking shortfalls in this period.” Ya think??? I can tell you from very personal experience that this will result in a very high amount of stress and upset for the neighborhood’s street parkers and is yet another example of how little consideration has been given to the surrounding community as a whole in this plan. Why can’t the developers require their workers to use public transportation? Given there has already been a serious and understandable reduction in parking area, and a commensurate concerted effort to de-prioritize driving in the city (congestion pricing), why the hell doesn’t this project require more sustainable travel for it workers, and why does it insist on further burdening the adjacent community and negatively impacting the quality of life for the residents? I further believe that the emissions from the increases in traffic to and from the sites and the delivery and truck activity described in the construction section will seriously degrade our air quality. This is not a healthy environment for young children, seniors, medically vulnerable residents, or anyone who values their long-term respiratory health. I request that mitigations for the street parking issue be

addressed and that the PACT partner provide a parking lot for the construction crew that does not impact the surrounding community in this way. (Andre_056)

Response 19.13: EIS Chapter 05.19, “Construction” notes that per *CTM* guidance, the Project Sites are located in Parking Zone 1 (consisting of Manhattan south of 110th Street and Downtown Brooklyn) and, therefore, the inability of the Proposed Project to accommodate future parking demands would be considered a parking shortfall but would generally not be considered significant due to the magnitude of available alternative modes of transportation. In addition, any parking shortfall due to incremental demand from construction workers would be short-term and not be considered a significant parking shortfall pursuant to *CTM* guidance. Furthermore, the forecast of parking demand is a conservative projection that does not account for the possibility of mode shifts due to the dearth of available parking, and thus it is possible that substantially fewer workers would drive personal vehicles to and from the Project Sites.

Comment 19.14: The DEIS references a Community Air Monitoring Program (CAMP) to ensure air quality thresholds are not exceeded during peak construction periods. EPA recommends that the plan for the CAMP be included in the Final EIS and that it includes information such as the pollution concentration thresholds, baseline monitoring requirements, the actions intended to be taken if exceedances are detected, the party responsible for the monitoring and response to exceedances, and how community feedback has been incorporated into the CAMP. It would also be useful to include monitors at local schools and parks to ensure acceptable air quality in spaces that children frequent. (Austin_434)

Response 19.14: As discussed in EIS Chapters 05.09, “Hazardous Materials,” and 05.14, “Air Quality,” the CAMP for particulates and volatile organic carbon compounds during in-ground disturbance is prepared and implemented as part of the RAP. See response to comment 9.1.

Comment 19.15: This chapter should more clearly define where impacts will be expected, what the level of impacts will be, where mitigation is necessary, and how much the mitigation will alleviate impacts of the proposed project. Additionally, there are discrepancies between the air quality chapter and the air quality impacts section of the construction chapter. The air quality analysis conducted needs to consider the impacts of all co-located emissions sources and clearly describe the impacts both locally and regionally. Even if not used for analysis, the worst-case scenario construction emissions year (2025) should be discussed qualitatively in the Air Quality Chapter to clarify the methodology used and to discuss the potential adverse impacts of construction and mobile source emissions. (Austin_434)

I just wonder, you know, in listening to the presentation, it seems to really minimize the environmental impacts. Just having ConEd for the past couple months digging up the street made it feel like an earthquake in our very, very fragile buildings, going back 150 years. And what is going to happen when they start driving the steel beams into the ground to build a 40 story high rise? I just nothing accounts for that. And speaking for the neighbors who most of whom

know nothing about this, this is just going to be disastrous. I mean, the damage to the buildings, having all these going on for 15 to 30 years, besides aerosolizing all the elements going into the air that, I mean, just having across the street, the repointing of the building covered our building in dust. Are we going to be covered in cadmium and lead for 15 years? You're going to just trash our buildings and make them valueless, and nothing like that's been addressed. (Adams_255)

Response 19.15:

EIS **Chapter 05.19, "Construction,"** identifies the significant adverse construction noise impacts in text and in several figures and tables. For the Preferred Alternative, this information is provided in Table 05.19-59, Figures 05.19-6a, 05.19-6b, 05.19-7a, and 05.19-7b, and discussed in the chapter text. Information on noise reduction measures to be recorded as PCREs, is provided in the chapter's Mitigation section under the heading "Noise Reduction Measures." Regarding the air quality analysis, it accounts for multiple emissions sources pursuant to *CTM* guidance. A regional analysis is outside the scope of the EIS. Consistent with *CTM* guidance, 2025 would not represent the worst-case scenario construction emissions year for the Proposed Project as it would not contain the peak construction quarter, which is the focus of the detailed quantitative analysis provided in the EIS.

Comment 19.16:

Occupational Safety and Health Administration (OSHA) regulations are designed to protect workers, although the regulations can also extend to protect the broader community. EPA recommends the use of lead-safe practices to minimize lead-based paint dust and debris generated during demolition activities to help protect workers, their families, and the local community, which includes schools. Reducing exposure to any lead dust arising from demolition activities is critical to protect health of children residing in Fulton and Elliott-Chelsea Houses and the local community, as well as those attending nearby schools. Mitigation measures should ensure dust does not impact nearby parks and outdoor spaces, especially those frequented by children. Monitoring for lead in air and dust in residential spaces, schools, and recreational/outdoor spaces and parks can help reduce exposure to lead. (Austin_434)

I am writing to strongly advocate for making sure you have pollution particle remediation during the proposed demolition of the Fulton and Elliott-Chelsea NYCHA developments as outlined in the Draft Environmental Impact Statement (DEIS) as a top priority. The asbestos, lead, and whatever other toxins in those developments must be safely removed. Besides that, all other particles need to be kept out of the air. While MAG Partners demolished the old building on 26th and 8th, Penn South demanded they hose down all demolition areas consistently during take down and if piles were being removed. They did so and this made a huge difference from what could have happened had it not been done. There are many people who are okay with the new development except for the worry about the air quality and what rains down upon us and our land. (Duffy-Jacobson_338)

I am concerned about air quality especially but not only at times of demolition. There will be all kinds of pollutants in the air. Some toxic and some not necessarily so. For folks with allergies &/or sensitivities &/or existing conditions- COPD or

non allergic. Asthma or allergic asthma these pollutants set free may be lethal. Then there are folks who never before had allergies and are now having difficulty breathing & then add wildfire smoke. If demolition is approved then will we be wearing N95 masks 24-7? & windows closed? & a/c off as well? (Shanley_344)

First and foremost, we are concerned about the health and environmental risks associated with demolition. What measures are being taken to mitigate exposure to rodents that are displaced from the buildings, lead paint, asbestos, construction dust? These are serious public health concerns, especially for young children. Not just in the outdoor air, but in the indoor as well, since the school will need new windows to keep out the dust and construction particles. Although, I heard someone say earlier that we didn't need new windows, but the school was built in from 1950 to the '70s. So definitely we'd need some updating. (Lawson_062)

I was in downtown on 9/11. Everybody knows what about 9/11 and the toxic elements that went into the air. And they told everybody that the air was safe to breathe and everybody could come back down, and people have been paying the price with cancer and diseases and dying from that exposure for years. They're saying that everything is going to be safe, they're saying that everything's going to be there's not going to be a disruption the community and the children in the schools are going to have to live with that for many, many years. (Minsle_067)

The DEIS does not provide adequate reporting of public health and air quality issues already existing. It is amongst the worst air in the city. Research documents that marginalized communities face a greater burden of air pollution. Regularly, fine particulates PM 2.5 primary pollutants are rated as “unhealthy and do not go outside” in the neighborhood: what will that mean under conditions of demolition? Further, we are concerned about the toxins of demolition and asbestos. We know what happened after 9/11, including our neighbors, my mother included who worked down there, and who have had health issues. There has not been an adequate reporting of embodied carbon in the air quality analysis, particularly for demolition and the impact of greenhouse gas emissions, harmful chemicals and resource depletion. (Cahill_271)

Response 19.16: See responses to comments 9.1, 19.2, 19.7, and 19.15.

Comment 19.17: With respect to construction Air Quality impacts for residents who must vacate their dwelling units during construction, EPA recommends the Final EIS provide more details on the relocation plans, i.e. where the residents will be relocated to and for how long. (Austin_434)

Response 19.17: Regarding construction air quality effects, see response to comment 19.7. Regarding planned temporary relocations of up to 120 households, see the response to comment 5.

Comment 19.18: The impact of the new tariffs on construction costs not limited to construction materials but also including the increased costs in needed equipment and its impact on investment markets? (Brown_085)

Response 19.18: The information requested in this comment is outside the scope of the EIS.

- Comment 19.19:** I request the DEIS present a comprehensive and detailed plan to prevent rodent infestation in the surrounding buildings on the campus and beyond, and a monitoring system that allows for continued input from the community about this predictable and largely unavoidable problem. (Andre_056)
- Response 19.19:** See response to comment 19.7 regarding pest control.
- Comment 19.20:** Safety is also top of mind. Windy days, unstable structures, they're looking at making a 38, 39 story building. You know, the construction debris are very real risks, and we've all seen news in these last several years. So what guarantees are being put in place to ensure our children's safety every day? (Lawson_062)
- Response 19.20:** EIS **Chapter 05.19, "Construction,"** states that a variety of measures would typically be employed to ensure public safety during the construction, including sidewalk bridges to provide overhead protection; safety signs to alert the public about active construction work; safety barriers to ensure the safety of the public passing by construction areas; flag persons to control trucks entering and exiting the construction areas and/or to provide guidance for pedestrians and bicyclists safety; and safety nettings as the superstructure work advances upward to prevent debris from falling to the ground. All DOB safety requirements would be followed to ensure the safety of the community and the construction workers themselves.
- Comment 19.21:** The DEIS does not include a comprehensive or enforceable phasing strategy to minimize prolonged disruptions or provide clear plans for keeping residents informed or protected. The DEIS also lacks specific commitments regarding safe pedestrian access, particularly near schools and senior housing, where risks to mobility and safety will be highest. (CB4_078)
- Response 19.21:** While the construction program outlined in EIS **Chapter 05.19, "Construction,"** is preliminary and conceptual, the conceptual construction schedule conservatively accounts for overlapping construction activities at multiple building sites in proximity to one another to capture the cumulative nature of construction impacts with respect to number of worker vehicles, trucks, and construction equipment at any given time, within reasonable construction scheduling constraints for each of the building sites. Furthermore, as implementation of project construction advances, it would be subject to various legal requirements and permitting processes. Also see responses to comments 9.1 regarding hazardous materials, 10.6 (regarding SWPPP requirements), and 19.6 regarding MPT requirements.
- Comment 19.22:** Please describe and detail the mechanisms will be in place to monitor and enforce construction mitigation protocols. ... While the DEIS acknowledges that construction noise is expected to result in significant adverse impacts, particularly for nearby residents, it fails to identify any advanced or site-specific mitigation strategies beyond standard practice – an unacceptable omission given the 15- to 20-year construction timeline. (CB4_078)
- Response 19.22:** As discussed in EIS **Chapter 05.19, "Construction,"** project construction would be governed by legal requirements for reporting and liaising with DOB and/or also subject to PCREs specified in legal documents binding on the PACT Partner. For

standard construction code measures, these would be subject to DOB enforcement. For PCREs, these would be subject to NYCHA and DEP enforcement and those agencies would also require documentation of compliance with DOB enforced requirements. These processes specify the consequences for violations. Regarding the second part of this comment, **Chapter 05.19** specifies the PCREs, which are to measures that go beyond code requirements to provide a reduction in the construction noise impacts associated with the Proposed Project.

Comment 19.23: MCB4 also requests the creation of a dedicated community liaison office, a 24/7 bilingual construction hotline, and a real-time alert system to notify residents of service interruptions, sidewalk closures, and staging activity. (CB4_078)

Response 19.23: The Proposed Project would provide a community liaison officer and establish mechanisms for documenting and addressing construction related complaints and issues raised by NYCHA residents on the Project Sites during construction.

Comment 19.24: We are equally concerned about the acknowledged noise impacts on Chelsea Park. The DEIS admits that noise increases at the park during construction would be noticeable and exceed CEQR TM impact criteria. Please describe and detail the specific strategies and mitigation to be used to ensure that Chelsea Park remains a safe and usable space for children, seniors, and all local residents throughout the many years of construction. (CB4_078)

Response 19.24: See response to comment 19.2, in which a community liaison officer would be provided to assist with documenting and addressing these issues. Regarding Chelsea Park, construction is predicted to produce noise levels at the park reaching the mid-70s dBA, in the “marginally unacceptable” range, and resulting in noise level increments up to approximately 12 dBA. As disclosed in EIS **Chapter 05.19, “Construction,”** the predicted noise level increases at this open space location would exceed the *CTM* impact criteria and the noise level recommended by the *CTM* for “areas requiring serenity and quiet.” However, noise levels in this area already exceed this recommended noise level. Chelsea Park consists of a soccer field, handball court, basketball court, playground, and calisthenics area, which are spaces used for active recreation that are not as sensitive to noise as a purely passive open space. Furthermore, the predicted noise levels during construction would be comparable to existing noise levels when the park is in use. Construction would occur during weekday daytime hours except for occasional Saturday work pursuant to DOB permits, leaving the park typically unaffected by noise during evenings and weekends. Additionally, the predicted levels of noise exposure at the park during construction would not rise to the level of a potential Public Health impact as they would not represent chronic exposure to high levels of noise, prolonged exposure to noise levels above 85 dBA, or episodic and unpredictable exposure to short-term impacts of noise at high decibel levels.

Comment 19.25: The DEIS must go further to address how noise will be proactively and transparently managed across the entire redevelopment. Please describe and detail the following: advanced mitigation strategies that will be deployed, such as acoustic curtains, sound-dampening barriers, noise-dampening fencing, or real-

time noise monitoring; how noise will be controlled during evening or weekend work, especially in the case of utility or emergency repairs; which parties NYCHA and other community residents will call if construction noise becomes intolerable; and the formal recourse or complaint resolution process which will be made available to NYCHA and community residents. And please confirm the following: that NYCHA and/or its development partners will commit to publicly sharing real-time data on noise levels, particularly in areas closest to schools, homes, and public open spaces; and that NYCHA will establish a dedicated resident complaint process and publish real-time noise data. We request NYCHA and the City go beyond compliance and commit to a clear, enforceable Noise Mitigation Plan that centers community health, equity, and transparency throughout the full duration of this redevelopment. (CB4_078)

Response 19.25: As discussed in EIS **Chapter 05.19, “Construction”** and in response to comment 19.5, construction of the Proposed Project would include noise control measures as required by the New York City Noise Control Code as well as additional measures that go beyond code requirements (PCREs), which would be required of the PACT Partner through legally binding agreements. Real-time noise monitoring is not proposed, as existing noise sources within and surrounding the NYCHA campuses already result in noise exceedances that occur more frequently than construction-related noise legally binding documents related to the Proposed Project would. Construction would occur during weekday daytime hours except for occasional Saturday work according to DOB permits, leaving noise-sensitive uses surrounding the NYCHA campuses typically unaffected by noise during evenings and weekends.

Chapter 05.20: Environmental Justice

Comment 20.1: The action, proposed by the Related Company, would release huge amounts of toxic dust throughout the Chelsea area. In addition, the proposed Related new buildings development would also bring truck exhaust and noise pollution to the neighborhood for many years on many streets with materials and cement deliveries continuing on a daily basis and on a massive scale. It would be an environmental catastrophe for Chelsea. (Andrews_243)

Response 20.1: See responses to comments 19.2, 19.5, and 19.7.

Comment 20.2: The DEIS concludes that the proposed redevelopment will not result in disproportionate adverse impacts on Environmental Justice (EJ) populations. Instead, it asserts that NYCHA residents—the primary EJ population—will benefit from the project through “improved housing conditions, energy systems, and access to open space”. However, this conclusion is weakened by using a 1.5-mile study area radius that includes large portions of high-income, low-vulnerability neighborhoods such as Flatiron, Hudson Yards, and West Chelsea... MCB4 and multiple community partners have emphasized that a more appropriate EJ study would focus on a smaller, more accurate area, such as a 0.5-mile radius around the

development site—one that captures the true footprint of disruption and locates environmental risk where it is being felt. (CB4_078)

Response 20.2: EIS **Chapter 05.20, “Environmental Justice,”** was prepared consistent with Federal and State guidance on environmental justice (EJ) analyses and is also satisfies the recently created state requirements for a Disadvantaged Communities (DAC) analysis. The selection of a 1.5-mile radius study area is based on the applicable guidance. As noted in the chapter, “It is recognized that the 1.5-mile study area includes the largest possible area where potential impacts may occur (e.g., childcare and transportation impacts) and that not all potential impacts would extend to the 1.5-mile boundary.”

Comment 20.3: I am not for the demolition of our homes. The CLCPA (the New York State Climate Leadership and Community Protection Act and Environmental Conservation Law) mandates that no project shall result in a disproportionate pollution burden on environmental justice communities. And that is what we have here. We have a disproportionate amount of issues that will be dealt through this DEIS. This must be factoring every part of the DEIS, because if it isn't, then it is in violation of so many laws, and that is what we have to understand. It will be in violation of Environmental Conservation Law, Article 48, New York City, Local Law 64 of 2017, New York City, Local Law 60 of 2022. (Keitt_072)

The DEIS also fails to apply the standards now required under New York State’s Environmental Conservation Law Section 7(3), which mandates that state agencies assess whether a project will result in “disproportionate or inequitable environmental burdens on disadvantaged communities.” No cumulative impact analysis is included, and no tools from the NYS Disadvantaged Communities Criteria are used to quantify vulnerability or exposure. Please describe and detail how NYCHA and the project partners will demonstrate compliance with this legal standard. Please describe and detail the metrics to evaluate disproportionate burden, and when will those findings be made public. (CB4_078)

Response 20.3: As noted in the response to comment 20.2, EIS **Chapter 05.20, “Environmental Justice”** includes a DAC assessment. This is consistent with interim guidance provided for other recent DAC assessments in New York City by DCP to ensure compliance with New York State Environmental Conservation Law (ECL) Section 8-0109(2)(k). The analysis and impact determination thresholds are described in **Chapter 05.20**. As detailed therein, the Proposed Project would not result in disproportionate environmental burdens on disadvantaged communities. Rather, the Proposed Project is expected to improve quality of life for the EJ populations on the Project Sites.

Comment 20.4: Please describe and detail the mechanisms to be implemented to ensure NYCHA residents receive the full benefit of redevelopment, without bearing a disproportionate share of the physical, emotional, and environmental costs. (CB4_078)

Response 20.4: The EIS, as outlined in its **“Executive Summary”** chapter, presents information on various mechanisms, including where applicable measures to mitigate fully or

partly or avoid impacts through PCREs and mitigation measures. It also identifies elements of the Proposed Project that would be provided in compliance with statutory or regulatory requirements, such as those governing the relocation of residents and Hudson Guild facilities pursuant to the URA and the requirements of the RAD Program. These and other project requirements will be obligations of the PACT Partner that will be memorialized in legally binding documents. The purpose of these measures is to ensure that existing FEC residents receive the benefits outlined in the description of the Proposed Project in EIS **Chapters 01.0, “Purpose and Need for the Proposed Project,”** and **02.0, “Project Alternatives,”** while minimizing disproportionate effects on any individuals or groups.

Comment 20.5: There is no mention of community co-governance, neighborhood oversight councils, or participatory design and planning sessions. Please describe and detail the steps planned to ensure that impacted residents have a meaningful seat at the table from pre-construction through final certificates of occupancy. (CB4_078)

Response 20.5: The information discussed in this comment is outside the scope of the EIS. Note, however, that as discussed in EIS **Chapter 03.0, “Process, Coordination, and Public Participation,”** there has been an extensive public engagement process for the Proposed Project, which has included numerous meetings and planning sessions with NYCHA residents.

Chapter 05.21: Mitigation

Comment 21.1: Resident safety must remain the highest priority before, during, and after construction. The Final Environmental Impact Statement (FEIS) should include detailed information about mitigation measures, including clear implementation timelines and accountability mechanisms. (Bottcher et al_077)

Response 21.1: Detailed information about practicable and feasible mitigation measures are provided in EIS **Chapter 05.21, “Mitigation.”** As noted therein, mitigation measures include construction noise control measures. In addition, resident safety also would be addressed by PCREs pertaining to construction air quality and operational air quality. As the EIS notes, project obligations to implement these measures will be memorialized in legally binding documents.

General Comments

Comment G.1: To strengthen the affordability outcomes of this redevelopment, it is critical that revenue generated through the project remain in Chelsea. These funds should be reinvested locally to support a higher percentage of affordable units and reduce the reliance on market-rate housing to finance the overall plan. (Bottcher et al_077)

Response G.1: While project financing is outside the scope of work for the EIS, the EIS notes throughout that the market rate housing on the Project Sites will financially support the PACT and affordable housing components of the Proposed Project on the Project Sites.

Comment G.2: This reinvestment strategy and increased affordability target would ensure that the benefits of redevelopment are felt most directly by the residents and neighborhood hosting the project. We strongly urge NYCHA and the development team to commit to keeping project-generated resources within the local footprint and to pursue bold affordability goals that increase Chelsea’s diversity and meet the city’s broader equity objectives. (Bottcher et al_077)

Response G.2: See response to comment G.1.

Comment G.3: We emphasize the importance of transparency throughout both the environmental review and the broader development process. Clear, consistent communication with residents is essential to maintaining trust and ensuring accountability at every stage of this project.(Bottcher et al_077)

Response G.3: EIS **Chapter 03.0, “Process, Coordination, and Public Participation,”** outlines the extensive ongoing outreach that has been conducted by NYCHA and the PACT Partner for the Proposed Project. NYCHA and the PACT Partner will continue to engage residents on site throughout the Proposed Project.

Comment G.4: Continued and sustained transparency, engagement, and accountability from all involved parties – including lead agencies, technical consultants, and the development team – is critical to the long-term success of the proposed project. Dedicated design workshops and stakeholder advisory panels should be conducted. NYCHA residents and the broader Chelsea community should be provided with ongoing opportunities to:

- shape the aesthetic and architectural direction of the project;
- ensure that community programs currently offered at NYCHA-operated centers remain accessible, consistent, and robust, and be provided with the opportunity to participate in planning around temporary spaces, staffing, and programming to maintain these resources during the transition and beyond;
- engage in shaping the programming of planned medical office space to address local needs and priorities; and
- have a key role in shaping the design of all open spaces, including courtyards, playgrounds, and rooftop areas.

Moreover, a detailed schedule for environmental testing procedures and a robust community notification protocol regarding hazardous materials remediation activities should be provided. (Bottcher et al_077)

Response G.4: As noted in EIS **Chapter 03.0, “Process, Coordination, and Public Participation,”** NYCHA and the PACT Partner have carried out regular outreach to tenants and community stakeholders and NYCHA and the PACT Partner will continue to engage residents throughout the Proposed Project. Regarding programming at community facilities and their accessibility during temporary relocation, see response to comments 5, 2.2, 2.5, 3.10, and 4.10. Regarding resident involvement in project design, see response to comment 4.7.

Comment G.5: MCB4 requests that the FEIS examine the implications of the projected loss of approximately 260 public housing bedrooms—identified through right-sizing in NYCHA’s April 21 letter to CB4—under the Rezoning, Non-Rezoning, and Mid-Block alternatives. Understanding how this nearly 6% reduction in bedroom capacity may affect future-generation housing needs is essential to ensuring the analysis aligns with NYCHA’s mission to preserve long-term access to deeply affordable housing. (CB4_078)

The only commitment from NYCHA and the PACT Partner is to replace one-for-one number of units and not bedrooms. There are many units throughout FEC that have 4 or 5 bedrooms with the potential to house larger families. If the only commitment is to replace the number of units and households grow during the Proposed Project, where will these families go once their homes are demolished? The DEIS repeatedly states “... there is already a readily observable trend toward higher incomes and more costly housing throughout the half-mile study area, and rents for market-rate housing are already above what is affordable to low-to middle-income households” the exact population of FEC. (Newman et al_260)

Response G.5: The Proposed Project has committed to providing replacement housing units for all current NYCHA residents on a one-for-one basis. While the size of DUs is outside the scope of the EIS, it is noted that both Section 8 and Section 9 require occupancy standards that residents living in a unit too big for their household size move to an appropriate-size unit when one is available.

Comment G.6: MCB4 noted that “all [major projects] include detailed financial plans and underwriting,” and called for disclosure of how construction, relocation, and long-term operations will be funded and sustained. (CB4_078)

NYCHA has subsequently indicated the goals for financial returns have now grown to include providing an income stream for NYCHA to use, no longer to fill any financing gap for the Chelsea NYCHA campuses, but throughout the city. This action has never been noted as part this environmental review. (CB4_078)

Response G.6: Requests for the release of financial plans and underwriting and analyses mentioned in this comment and analyses of Project underwriting is outside the scope of the EIS.

Comment G.7: MCB4 requests study of the following sustainability elements to align this redevelopment with citywide climate goals and community expectations:

- On-site generation of all power, including heat and hot water, using self-sustaining, renewable sources
- Rooftop solar and wind systems to support Zero-Energy or Net-Zero buildings that produce as much energy as they consume
- Bio-solar green and cool roofs equipped with energy storage
- A commitment to achieving Local Law 97 compliance and delivering fully net-zero buildings by project completion
- Use of low-carbon and carbon-negative building materials

- Integration of dense above street and vertical greenery throughout the development
- Permeable pavement and bioswales to manage runoff and reduce pressure on local stormwater systems
- A rooftop stormwater management plan
- Public, indoor bike parking in all buildings
- Off-street, below-ground parking provided at no cost to NYCHA residents, with expanded secure access
- Ample EV fast chargers available to the public without a paywall
- Solar-powered outdoor path lighting
- Smart irrigation systems for natural and landscaped vegetation
- Solar photovoltaic systems to support on-site renewable electricity generation (CB4_078)

Response G.7:

As discussed in EIS **Chapter 05.14, “Air Quality,”** NYCHA and the PACT Partner have committed to electric-powered heating and hot water systems for all new buildings on the Project Sites. Additionally, as noted in several EIS chapters including **Chapters 05.12, “Energy,”** and **05.15, “Greenhouse Gas Emissions and Climate Change,”** the Proposed Project would be required to comply with various statutory and regulatory requirements as well as NYCHA standards to ensure that the Proposed Project supports State and City efforts to improve environmental conditions. For example, the Proposed Project would be required to achieve benchmarks consistent with the achievement of the City’s 80 percent reduction in greenhouse gas emissions by 2050 and the State’s 85 percent reduction in greenhouse gas emissions by 2050. As noted in EIS **Chapter 05.10, “Water and Sewer Infrastructure,”** the proposed project is required to comply with New York City’s Unified Stormwater Rule. However, except as specified by law, the specific measures used to achieve these and other requirements and sustainability goals, such as those listed in this comment, are outside the scope of the EIS.

Comment G.8:

MCB4 requests that the designated developer and NYCHA describe and detail how NYCHA replacement units will be fully integrated with affordable and market-rate housing across all buildings to promote equity and social cohesion. Please describe and detail how building design, amenity access, and programming will be structured to ensure equitable treatment of all residents and to avoid physical or social separation. (CB4_078)

Response G.8:

As noted in EIS **Chapter 02.0, “Project Alternatives,”** the new buildings that would house all existing NYCHA residents in new DUs would be constructed first, and these buildings would contain Section 8 PBV units, exclusively. The additional new buildings to be constructed thereafter would include both affordable and market rate units. The proposed locations of each building on the Project Sites for each feasible alternative are shown in figures in **Chapter 02.0.** Each Project Site would include accessory open spaces accessible to the residents of each Project Site irrespective of the type of unit they occupy. The remainder of the information requested is outside the scope of the EIS.

- Comment G.9:** Please describe and detail the indicators to be used to assess improvements in quality of life. Please identify which parties will be responsible for collecting and reporting these outcomes, and how will residents be involved in shaping accountability structures. (CB4_078)
- Response G.9:** Assessments or monitoring of the kind described in this comment are outside the scope of the EIS.
- Comment G.10:** NYCHA, Related, and Essence must confirm that interim repairs will continue to be made to ensure health and safety during the proposed multiyear construction period. (CB4_078)
- Response G.10:** Interim repairs, including the Bridge Plan are described in EIS **Chapter 02.0, “Project Alternatives,”** under its formal name “Maintenance and Operations Improvements at Fulton, Elliott, Chelsea, and Chelsea Addition Houses,” for informational purposes, but are not part of the Proposed Project. More information about these interim repairs is available at: [<https://www.fultonelliottchelsea.com/bridge-plan>]
- Comment G.11:** MCB4 again requests NYCHA make building conditions report publicly available. (CB4_078)
- Response G.11:** This request is outside the scope of the EIS.
- Comment G.12:** We respectfully request that NYCHA provide and explain all existing facade inspection reports, structural assessments, and related documentation to support its findings. Ensuring public access to these materials is essential for a transparent evaluation of rehabilitation alternatives and for building confidence in the agency’s decision-making process. (CB4_078)
- Response G.12:** This request is outside the scope of the EIS.
- Comment G.13:** How can NYCHA ignore the facts that this project will racially segregate the tenants in six high rise buildings, the kind that Chicago knocked down as uninhabitable in the Cabrini Greenhouses? The DEIS downplays the devastation this project will have on the lives of the thousands of public housing tenants and the Chelsea community, as the previous speaker just said. Your complete failure to closely examine this project and willingness to go along with the plan that makes no sense. (Polletta_468)
- Response G.13:** The Proposed Project would replace the Project Sites’ existing public housing units on a one-for-one basis with new DUs in new replacement buildings. The replacement buildings for NYCHA residents will be constructed prior to new additional developments on the Project Sites, thereby retaining the existing population in place.
- Comment G.14:** The Draft Environmental Impact Statement fails to provide a credible or just analysis of the No Action Alternative. Rather than examining comprehensive modernization, a clear and achievable path for NYCHA campuses like Fulton and Elliot Chelsea, the DEIS narrowly frames the No Action Alternative as a

placeholder marked by stagnation and decline. This is a distortion of reality. (Kites_044)

Is demolition of the buildings necessary? I have not seen viable support for demolition. What about rehab? Has rehab been adequately, adequately studied? I say, no. That more is needed. More looking into rehabbing. (Shanley_048)

We need to refurbish this and do it nicely and restore what NYCHA to the glory days of what was in the '30s and the '40s, and the '50s. There's no reason in this city with so much brains and intelligence and wealth, we can't have nature refurbished and rebuilt to its back to its heyday. That's what I'm saying. So, thank you all very much and please do not demolish these buildings, refurbish and make them beautiful. (Warren_154)

You have solid construction. They don't build housing like this anymore. This is solid. What we need is HPD to step up, get enough money to upgrade the systems, the elevators, and the plumbing. That's all we need. (Delgadel_059)

I think that the main thing for all of us in the community that came here today is to let you know that you deserve decent, decent living conditions. But that doesn't mean that you want to leave your place. Your projects, I mean the public housing that you live, that you have raised your kids, that deserves to be renovated. (Colon_280)

There has been renovation at NYCHA buildings all over the city. There was a comprehensive modernization in Gowanus. They replaced bathrooms, they replaced heating, they replaced kitchen, they replaced elevators. And in the Reese houses, they voted to stay in section nine. So I have to say to you, people in Chelsea, let's vote for our future. Let's fight for our future. Let's tell our elected officials we will not be sacrificed (Andre_286)

I write as the former Deputy Chief of Staff to NYS Senator Robert Jackson who represented him at the NYCHA Chelsea Working Group meetings when Elliott-Chelsea was in Senate District 31 in 2019, 2020, and 2021.. Throughout my time on the working group, our overriding priority was providing full information to residents so they could determine the next steps for their homes. The carefully considered Working Group Report managed to provide a blueprint to fiscally responsible rehabilitation of these developments with minimal disruption to current residents. Demolition was **explicitly** off the table, at the residents' behest, and must remain so unless a properly-conducted resident-led survey can be produced demonstrating a majority want otherwise. Related has no place in public housing and was the wrong choice for this project. Suffice it to say the premise of the project has been flawed since the RFP process, and I oppose that premise, which means I think the DEIS needs to be scrapped, demolition taken off the table, and a new process swiftly pursued that puts residents in the driver's seat. (Nickell_138)

I'm against the demolitions of our development, our buildings are in great condition. (Lara_210)

I support rehabilitation, no demolition for the following reasons: 70% will be market rate and mixed income. The community desperately needs more affordable housing. (Fisher_324)

I've read the DEIS report and rehabbing and renovating is very clearly the only fiscally, socially, and environmentally responsible path forward for all parties. ... If this were intended to be a project truly benefiting the residents and the community, then the current buildings would be rehabbed, thus maintaining their positioning, open spaces and trees, setbacks, building heights, etc., so as to not overcrowd the lots, and for them to continue to work in harmony with the surrounding communities. Rehab over demolition. I implore you, for the sake of the residents of Fulton and Elliott Chelsea, the Greater Chelsea community, our children, and future generations of New Yorkers, please do everything in your power to encourage rehab over demolition. (Riotto_197)

I am against the demolition, and I would prefer to stay in my apartment and please renovate around us. The length of time that they're going to build, most of us is not going to be here. We're only allowed one day at a time. So please, I'm going to be very brief, just leave us where we are, and I am against demolition. (Hunte_064)

I am writing to strongly oppose the proposed demolition of the Fulton and Elliott-Chelsea NYCHA developments as outlined in the Draft Environmental Impact Statement (DEIS). The health effects of seniors like me will be unprecedented. We will lose green space and playgrounds We will lose sunlight. I urge HPD and NYCHA to reject the current proposal, make rehabilitation the preferred alternative, and return to the community with a plan that prioritizes the health, stability, and dignity of public housing residents. (Albourn_179)

If this were intended to be a project to truly benefit the residents and the community, then the current building's would be rehabbed...thus maintaining their positioning, open spaces and trees, set backs, heights etc., so as to not overcrowd the lots and to continue to work in harmony with the surrounding communities. FULL STOP. I implore you, for the sake of the residents of Fulton and Elliott-Chelsea, the community, our children and future generations of New Yorkers, please REHAB and do not demolish. (Riotto_197)

Rehabilitation is less costly and less disruptive. There were no independent studies, only those of developer. (Fisher_324)

Do not demolish this location, but instead repair and restore them, which allows those who need these living spaces the dignity and emotional health they deserve given the climate of the government, the past demolitions based on actual “green lining” where previously ignored locations all of a sudden seem attractive for wealthy new residents and are continual carved out for demolition. (Ideraabdullah_325)

As the saying goes “Demolition is Violence” from not only a social perspective, but a climate perspective. Is demolition and new construction in violation of NYC’s City of Yes for Carbon Neutrality? From a long-term cost and public health perspective, that includes embodied carbon and greenhouse gas emissions, the

Alternative focused on rehabilitation is much more cost effective. And, at the same time over 350 mature trees will be lost? This is not evaluated sufficiently in the DEIS. (Cahill_271)

Response G.14: EIS Chapter 02.0, “Project Alternatives” describes a No-Action Alternative that assumes the existing units on the Project Sites would remain Section 9 NYCHA housing and routine maintenance and repairs would occur. This serves as the baseline for analyses of other alternatives. As noted in the EIS, the No-Action Alternative would not address the purpose and need for the Proposed Project. Additionally, an analysis of the Rehabilitation and Infill Alternative is provided in EIS Chapter 05.22, “Rehabilitation and Infill Alternative Analysis.” This alternative was added as a result of comments on the Draft Scope of Work on the DEIS. Regarding the concerns about the Proposed Project expressed in these comments, see response to comments 4 and 6.

Comment G.15: I also want to bring to your attention the other large construction projects that are proposed in this particular area, which include City of Yes, also the New Garment District, and also what's happening at Penn Station, which is proposing a large project on West 29th Street. I don't think the DEIS has brought those projects into consideration in this DEIS. And that is the end of my comments. (Buchanan_070)

Also, there's no mention whatsoever of the maybe seven other projects that are going concurrently when these buildings are going down. So, you have the casino or whatever that is over there, just next to the diner. There's an empty lot. There's the woman's prison and there's a few other projects that are going to go on concurrently. (Robinson_018)

Response G.15: EIS Chapter 05.01, “Land Use, Zoning, and Public Policy” includes an analysis of concurrent developments within the secondary study area (1/4 mile). Additionally, each EIS chapter considers the No-Action Alternative, which would include No-Action development projects within the secondary study area, and layers the potential impacts of the Proposed Project over that future condition to determine the potential impacts of the Proposed Project along with other planned development in each of the resource categories.

Comment G.16: As far as I'm concerned, given how the PS 11 project appears to be taking 2 or 3 times longer than originally proposed, this new project and its effects on our community could continue beyond my lifetime! Further, what the heck is going on with the bidding process here? A \$2 billion no-bid contract? Is this how our tax money is being handled? (Winter_089)

A \$1.9 billion no-bid contract with a private developer—without a competitive procurement process and questionable transparency—undermines public trust and fiscal accountability. (Yong_208)

I'm not going to talk about the sewer yet, but when I talk about something that smells, a \$1.9 billion project, no bid? Doesn't that smell to you? How did that happen? How did that happen? And our elected officials say, well, housing, any

housing is good housing. That's not true. They took away St. Vincent's Hospital, they gave us housing. Those apartments are \$6 million each. (Gelb_363)

The financial structure of this plan raises serious concerns. A \$1.9 billion no-bid contract with a private developer—without a competitive procurement process or public transparency—undermines public trust and fiscal accountability. I urge HPD and NYCHA to reject the current proposal, make rehabilitation the preferred alternative, and return to the community with a plan that prioritizes the health, stability, and dignity of public housing residents. (Wolf-Powers_263)

The environmental impacts presented in the DEIS would be harmful, with construction projected to continue for 16 to 30 years. The proposal to demolish 24 public housing buildings and replace them with luxury towers is not only environmentally destructive — it is socially irresponsible and highly disruptive to lives. We at MSCC urge HPD and NYCHA to reject the current proposal and return to the community with a plan that prioritizes the health, transparency, and dignity of public housing residents. (MSCC_435)

Demolition and redevelopment costs more and it takes longer to do than rehabilitation. The cost for demolition and redevelopment was estimated to be \$1.9 billion (before tariffs)! Architects have said that rehabilitation would cost significantly less. (Gelb_363)

Dear NYCHA, HPD and HUD officials, I am writing to strongly oppose the proposed demolition of the Fulton and Elliott-Chelsea NYCHA developments as outlined in the Draft Environmental Impact Statement (DEIS). The environmental impacts presented in the DEIS — including unmitigated noise, severe shadow impacts on parks and schools, and increased traffic congestion — are unacceptable. These harms would last for decades, with construction projected to continue for 16 to 30 years. The proposal to demolish 24 public housing buildings and replace them with luxury towers is not only environmentally destructive — it is socially irresponsible. The alternative of rehabilitation and infill has been dismissed without serious consideration, despite being more cost-effective, less disruptive, and widely supported by tenants and community members. Furthermore, the financial structure of this plan raises serious concerns. A \$1.9 billion no-bid contract with a private developer—without a competitive procurement process or public transparency—undermines public trust and fiscal accountability. I urge HPD and NYCHA to reject the current proposal, make rehabilitation the preferred alternative. (Abel_130, Abideen_548, Ahn_378, Aloisio_119, _518, Amatriek_252, ambrownesquire_097, Arenstein_406, Arons_172, Athey_162, Augello_400, Baez_134, Barrow_404, Batriss_517, Baum_175, Bianchi_276, Birnbaum_508, Black_275, Bloomer_497, Bollack_188, Brazile_367, Brenner_362, Brom_515, Brooks_401, Brorde_521, Bruno_218, Bryant_505, Burch_167, Cahill_552, Catalinotto_376, Cieri_385, Clark_123, Clemente_185, Cohen_168, Cote_171, Cruz_088, De Castro_392, Dobbs_507, Dousmanis_527, Dubnau_223, Eichler_510, Fariello_417, Feldman_193, Flanzraich_278, Florian_200, Fraad_192, Franchini_101, Frost_393, Gardner_506, Geary_150, Giardina_124, Gibbons_530, Gil-Frederick_383, Gilstein_514, Ginsberg_418,

Gomez_140, Gonzalez_178, Gonzalez_129, Green_284, Greene_166, Gross_410, Guttu_496, Haikalis_198, Halen_504, Harmeling_523, Hedgecoke_389, Heflin_190, Hickerson_118, Hicks_107, Humm_102, Hunte_542, Jacobs_503, James_296, Jane_534, Jennings-Houston_159, Jong_131, Katz_141, Kaufman_483, Kechlian_494, Kellersberger_238, Keyes_285, Kilgore_537, Kockman_106, Koshy_366, Lang_516, Langer_545, Lavietes_292, Lawson_108, Lazarus_160, Lee_307, Lee_550, LeMonds_373, LeSpina_489, Levenson_161, Liben_261, Lint_551, Lipton_126, Louard_361, Machlin_509, Malave_182, Malhotra_359, Malichio_539, marbkn_291, Marchant_137, Marenstein_163, Martin_155, Marx_310, Mauceri_114, McCann_498, McClaurin_135, Merae_495, Messina_298, Michelson_348, Millman_145, Mitchell_194, Moore_231, Morrow_427, Mullins_484, Narricuico_535, Nash_397, Neal_173, Ng_391, Niederman_314, O'Dea_117, O'Neill_379, O'Sullivan_251, Olff_353, Olsen_112, Olsen_487, Opatow_398, Ortiz_295, Orum_382, Penrose_248, Peoples_422, Perry_144, Pickens_528, Pinderhughes_414, Polletta_267, Radelet_377, Regal_365, Reiburn_375, Reiner_511, Reisen_204, Rich_180, Riveros_493, Rizzo_357, Rogol_529, Rose_225, Rosenberg_205, Roth_403, Rothstein_297, Rudnick_411, Rule_164, Ryan_540, Rydel_090, Sabater_199, Saddy_196, Sanchis_191, Sarachild_254, Schapiro_127, Schapiro_525, Schneider_490, Schoichet_533, Seward_557, Shapiro_543, Shatz_096, Singer_395, Smith_165, Smucker_083, Soso_148, Soto_547, Stern_206, Suqi_358, Swietnicki_143, Syracuse_399, Tannenbaum_549, Taylor_099, Tehrig_531, Temple_115, Thorburn_412, Tioska_386, Valentin_513, Vinopal_388, Weinstein_128, Wells_492, Willson_381, Wu_501, Zager_354, Zimmer_512, Unknown_488, Unknown_491, Unknown_499, Unknown_500, Unknown_502, Unknown_519, Unknown_520, Unknown_522, Unknown_526, Unknown_532, Unknown_536, Unknown_538, Unknown_541, Unknown_544, Unknown_546, Unknown_553, Unknown_554, Unknown_555, Unknown_556, Unknown_558)

Given Related's track record of breaching their agreements and not completing the construction of properties to which they have committed, we should take their Demolition & Reconstruction proposals off the table. Even more disturbing – the original RFP that went out for bids for the Fulton and Elliott-Chelsea project was for Rehabilitation and NOT Demolition & Reconstruction. When the project changed from a rehab/renovate project to a demolish and reconstruct project, there should have been a new RFP! There has been no transparency whatsoever regarding financial liability and insurance. How will the NYCHA residents and the Chelsea community at large be protected? As far as we know, the NYCHA residents could be left with no homes, no protection, and no recourse. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

AND why are Essence Development and The Related Companies going to be the ones to be the developers without competitively bidding on this \$1.9 billion contract. I urge HPD and NYCHA to reject the current proposal, make

rehabilitation the preferred alternative, and give the community a plan that prioritizes the health, stability, and dignity of public housing residents. I object to this plan that was a no bid ?! proposal & awarding the developer, Related over 1 one billion dollars. (Shanley_343)

Response G.16: Comments noted.

Comment G.17: The document gives no reason why renovation is infeasible. It says it just doesn't meet the goals of the proposal. Let me tell you about those goals: goal number one is to turn public land over to for profit developers who will then reap unbelievable profits from Section 8 and from leveling the very high value of the land. The public land; Related will make the money, with some set aside for NYCHA who will use it as they wish, but outside the community. The second goal is to relieve NYCHA of its constant failure. NYCHA is a failure and corrupt organization. Don't take my word for it, that's the word of the federal monitor and the judicial system. NYCHA doesn't do what it's supposed to do, and yet they do it with our taxpayer dollars. This project is infeasible because our elected officials care more about looking good than doing good. Okay? They say they want to create more affordable housing, but this project is 70 percent luxury housing. Related didn't build the affordable housing at Hudson Yards, and now our elected officials are gambling that they'll build it here. I'm not taking that bet. (Totaro_022)

CB4 has asked NYCHA to release a detailed building condition and cost survey to better explain why FEC cannot be renovated at comparable costs to similar NYCHA developments. NYCHA has refused in writing. CB4 in its comments on the Draft Scope of Work, also asked NYCHA to study a non demolition alternative. NYCHA responded in the DEIS by simply copying a proposal from Related to RFP response, which had long since been judged infeasible. The DES didn't even bother to describe or label this alternative in a way that made it understandable. The lack of honest effort to explore such a solution is insulting. (Holowka_429)

The Rehabilitation and Infill Alternative and the No Significant Adverse Impacts Alternative are unjustifiably excluded from the DEIS's analysis, deemed “financially and logistically infeasible and would not meet the Proposed Project’s purpose and needs” by the project proponents. This self-serving assertion deprives elected representatives of the ability to weigh the costs of environmental degradation against the purported benefits of the proposed project, allowing the proponents to unilaterally determine this balance without disclosing the true environmental costs. (Lunke_076)

The DEIS includes a Rehabilitation and Infill Alternative in response to comments received on the DSOW. However, the DEIS summarily dismisses this option with conclusory statements that are entirely unsupported by facts. The Rehabilitation and Infill Alternative is rejected, without support or comparison, as financially and logistically infeasible and concludes that it would not meet the identified purpose and need of the Proposed Project. See Chapter V of the DEIS. To date, the “significant, previously unanticipated capital repair needs” allegedly revealed by the PACT Partner during its “comprehensive, five-month pre-design due diligence” have not been released notwithstanding numerous calls from residents,

the community, stakeholders, and others to do so. NYCHA has completed PACT conversions of over 21,000 units in its public housing portfolio and this project, spearheaded by The Related Companies is the only one to claim repair needs three times greater than initial estimate yet offers no evidence to support such claims. Request for Further Analysis for the EIS: NYCHA needs to order a new full-scale assessment to be performed by a qualified third party analyzing current outstanding repair needs and the 20-year capital needs of the entire FEC units and developments. Following such an assessment, NYCHA should re-issue a new RFP for FEC so that interested entities can submit new proposals that properly address the repair needs. (Newman et al_260)

There is not a transparent breakdown of costs. However, upon closer examination what we note is that the cost per dwelling unit seemingly doubled in the course of two years, while the footprint for NYCHA resident's apartments has been diminished. How is it possible that the cost per dwelling unit has doubled? Please investigate this. (Cahill_271)

Response G.17: See response to comments 6 and 15.

Comment G.18: The environmental impact will be onerous for everyone living in or near the Fulton and Elliot-Chelsea Houses. For example, PS 33, an elementary school, is directly on the site. When asked at the public meeting how the elementary school will be protected from the dust, debris and particles, the response was that it was New York City's responsibility. (Gelb_363)

Response G.18: Comment noted.

Comment G.19: As a Chelsea resident, I am hereby requesting answers from NEPA-ENV/HPD addressing the following environmental impacts as presented in the DEIS, including: the impact in our air quality, unmitigated noise. (Colon_280)

Response G.19: Regarding air quality, see response to comment 14.1. Regarding noise, see response to comment 19.5.

Comment G.20: There are no plans to handle the additional population and its impact on schools. (Gelb_363)

Response G.20: See response to comment 3.3.

Comment G.21: Children's health in particular will be negatively affected and there are many schools in the area, both public and private: PS 33, Avenues, the World School, and the James Baldwin school, for example. (Fischer_323)

Response G.21: The effects of the Proposed Project with respect to children's health is addressed by several sections of the EIS, including **Chapters, 05.09, "Hazardous Materials," 05.19, "Construction," and 05.21, "Environmental Justice."** See also response to comment 14.1.

Comment G.22: As a Chelsea resident, I am hereby requesting answers from NEPA-ENV/HPD addressing the following environmental impacts as presented in the DEIS, including increased traffic congestion (Gelb_363)

Response G.22: See response to comment 13.5.

Comment G.23: I am a resident in Fulton houses. I don't agree or disagree with the new project BUT I am concerned with where that would leave me. Will tenants have their homes upgraded or be put out. That's my biggest concern. (Yorke_013)

I've been in such a goddamn stress, you know? Though, I feel like I going to have a heart attack, you know? And I'm getting sicker and sicker. My health is very delicate. I have fire (unintelligible) in my artery, you know, and my lung, my breathing, and all the jazz. And people come there trying to convince us that we had to move, you know? That is abusing us. They abuse; clear abusing us. Because we, old people, get vulnerably, delicate. (Denec_060)

Will NYCHA hold harmless any and all of the tenants covered or affected by this project from any and all emotional, physical or property related damages suffered by said tenants whether caused by or resulting from their removal from their apartments, the demolition or construction of new buildings or their displacement from their existing public housing apartment? (Polletta_268)

Where will the current tenants be housed while their buildings are being torn down? (Stamm_335)

Response G.23: See response to comment 5.

Comment G.24: I've lived here for 30 years and am raising a family in Chelsea. Let Steve Ross build his glass empire in another city. Better yet, how about out in the Hamptons, next to one of his homes? I'm sure his family wouldn't mind the unmitigated noise, severe shadow impacts on parks and schools, and increased traffic congestion the project will bring. These harms would last for decades, with construction projected to continue for 16 to 30 years! Let his neighbors experience that, not our Chelsea community. (Geller_221)

All I can say is that we the people living in Fulton and Chelsea projects have been living a stressful life because of this...yes we want better but it's not going to be easy for us...specially to seniors and the sick ...our rents are going to become a problem and changing our address after renovations...many of us are either too old or too sick to deal with this...we need help (lhenriquezny_273)

The narrative in question has simply ignored the existence of the people who live and or have lived in those homes, who have worked hard to keep and maintain a home, many of them for one and /or two generations. The narrative has ignored the quality of life of the seniors who want to enjoy their last years of life in peace and without the uncertainty and travesty of a proposed demolition and quite a long term displacement, with no real guarantees to return to their apartments, as for many of the seniors, their current age factor is a key one. But most importantly, the majority of them want for their homes to be repaired, not demolished. In

addition, the narrative that we hear in the NYCHA presentation and the DEIS report is like a reiteration from the public officials that what matters is the ‘bright and better housing future’, and the current residents will not necessarily be part of that equation. (Colon_280)

Related is looking at their own potential profit, not the multi-year financial, environmental, and health depredations that would be suffered by the entire neighborhood over the estimated 16-to-30 year period of demolition/construction. Between the noise, the air pollution, the exacerbated traffic problems and the disruption of street-level retail and pedestrian foot-traffic (in addition to the displacement of thousands of tenants, mentioned above). (Fischer_323)

Should this plan go through, more than buildings are destined to be demolished. If this plan goes through, not only will greedy developers profit from a public 'land grab' with waterfront views earmarked to house the wealthy, but the hopes, dreams and futures of working people will be demolished along with the bricks and mortar. The likelihood that the tenants and their children now living in public housing, to prosper and succeed, will be denied perhaps forever, if the plan now being considered, is enacted. (Marsh_374)

This environmental impact seems to be the only concern here. No one is talking about the psychological impact. I have anxieties. I've been depressed, and the daughter being forced to leave my home. I will be displaced because I will be forced to leave my home that I've always lived in.

Many will suffer a lot of psychological harm. Ever since this demolition was proposed, many have been under a lot of stress and depressed, and there's no accountability. (Miranda_485)

We're also thinking about our neighbors, the families who live in these buildings currently undergoing renovation. This project will affect their routines, their children's lives, and their wellbeing's. How are their voices being heard? (Lawson_062)

Response G.24: Comments noted.

Comment G.25: What I've been seeing is there's just alternate number two, three, and four, not number one, which was to save the buildings as is and do the renovation. It's as if you're saying that it's a non starter, but the starter should be that the renovation should be the first thing to look at. Given that I've not seen any floor plans of existing conditions, original documentations, sections, riser diagrams, I've not seen point clouds. I've not seen any AutoCAD drawings, Revit drawings, anything that is cut state of the art that could be used for assessing existing conditions. (Robinson_018)

Response G.25: The EIS addresses the following alternatives and consider whether they meet the purpose and need of the Proposed Project: (1) a No Action Alternative without any demolition of existing units or PACT conversions; (2) the Preferred Alternative, with new Section 8 PBV DUs, affordable housing and market rate housing; (3) a Non-Rezoning Alternative with new Section 8 PBV DUs, affordable and market

rate housing; (4) a Midblock Bulk Alternative that would be a variation of the Preferred Alternative but would shift bulk to the middle of the Fulton Houses Project Site; (5) a Rehabilitation and Infill Alternative which would involve the rehabilitation of existing NYCHA DUs and conversion to Section 8 PBV DUs through PACT as well as two new infill buildings on the Fulton Houses Project Site and one new infill building on the Elliott-Chelsea Houses Project Site; (6) a No Significant Adverse Impacts Alternative, to determine if an alternative that can meet fully or in part the purpose and need for the Proposed Project can be implemented without resulting in any significant adverse impacts, and (7) a COY Alternative that was added to the FEIS to reflect another option for redevelopment under the Project Sites' existing zoning pursuant to the recently adopted City of Yes for Housing Opportunity zoning text amendments.

Comment G.26: Additionally, I would like to reiterate a longstanding request. Since my son turned 7 years old, I have been requesting a transfer to a two-bedroom apartment to better accommodate his needs and provide him with a more suitable living environment. He is now 11, and this request remains unresolved. I kindly ask that this matter be given consideration during any upcoming changes or relocations. (Lewis_001)

Response G.26: All inquiries, comments, or complaints concerning current NYCHA tenants should be directed to the NYCHA Customer Contact Center by calling (718)-707-7771 or by visiting one of NYCHA's Customer Contact Center Walk-In locations. For more information, please visit: <https://www.nyc.gov/site/nycha/about/contact.page>.

Comment G.27: There was no vote. There was a survey and a misleading, poorly designed under publicized survey with a 10 percent response rate. That survey did not even use the word demolition. (Law-Gisiko_081)

And then there's tenant support. The fiction repeated until even the authors must blush. There was no vote. There was a survey and a misleading, poorly designed under publicized survey with a 10 percent response rate. That survey did not even use the word demolition. (Law-Gisiko_081)

The survey cited within the DEIS did not constitute a mandate for demolition. Its three suggested options for campus improvement never even mentioned demolition. Given NYCHA representatives' public acknowledgment that the survey was merely a "temperature check" and not a binding vote on residents' futures, its outcome holds little bearing. A subsequent petition, signed by 949 FEC residents, unequivocally stated "NO" to demolition, garnering 400 more signatures than the number of residents who responded to the survey favoring new construction on the campuses. (Lunke_076)

The original survey administered to only a fraction of the NYCHA residents was deceptive and misleading and clearly produced an erroneously positive result for the developers. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

I am aware of the Citizens Housing & Planning Council analysis where only 969 residents participated in the survey, which represents approximately 29% of the total eligible population across both campuses. Of this low percentage of participants those in favor (57%) of new construction/full replacement does not impress me as representing tenants voices. The environmental impacts presented in the DEIS concern me greatly. Living on 9th Ave I would be directly impacted by the demolition unmitigated noise, air pollution, severe shadow impacts on parks and schools, and increased traffic congestion. (Hodorowski_240)

The current Tenant working group supported rehabilitation, not demolition. The initial first survey was poorly worded and misunderstood by participants: New construction with rezoning; New construction without rezoning; Rehab. Only 510 answered the questions and confusion was reported. The current survey was answered by 954 resident and supported rehab (Fisher_324)

I am accusing the joint venture of Essence Related of using distinct terms interchangeably in order to muddle the waters for the big developer interests while shutting out the residents who help build this community over the decades. Essence Related has made it seem like most residents voted for an option of demolition, but we didn't. It is clear from their own documents that they distinctly called it a survey. (Williams_481)

And I don't understand why they can't renovate our apartments to code. Because this is just, you know, it a bait and switch. They told everybody they were going to fix the apartments, and then they say, oh no, we got to tear them all down. Because the thing is, everybody that I knew that supposedly voted because I voted renovation, everybody I asked in my building, they all said they voted for the same thing. I don't know anybody who voted for demolition. (Vega_069)

Residents must be informed that they have rights. You have more rights as a Section 9 tenant. What else must be investigated are the lack of transparency. So first of all, calling the survey a vote, saying demolition is starting this summer, saying this is a done deal, fearmongering. Related and Essence are real estate oligarchy. They are the bad actors. We see the oligarchy running our country. This is true at the city level too. They have a track record of dispossessing public housing residents in Liberty Square in Florida, and then also using money from East Harlem and Harlem campus developments to fund Hudson Yards through the EB5 Visa program. (Cahill_074)

Safety and environmental preservation of the nearby neighborhood are a serious consideration. If a community survey was done this plan would not even be a consideration. I am also concerned about the involvement of the large commercial construction and real estate firms. (Fox_007)

We know that this whole project is based on a lie and false promises by Related. For the last six years, residents have been fighting privatization, demolition, red, packed every privatization scheme. They've demanded repairs, not Related real estate that nobody invited in to come in. It's been shown when demolition happens, residents do not move back in, they are estranged, neighborhoods are destroyed, communities are destroyed. And we in Penn South, a working class community of

trade union fighters, a lot who grew up in public housing, and we stand in solidarity with the residents of NYCHA, and we will fight to the end. We've been fighting for the last six years. We're fighting today. We'll fight in the future and you will be sorry if you commit if you commit this, because we know if they could destroy NYCHA, they will come for us. (Wilcox_039)

Residents residing outside the NYCHA developments were unjustly excluded from the project survey, despite the proposed redevelopment's potential for significant impacts extending far beyond the campus perimeters (Lunke_076)

Despite submitting a proposal to the RFP that required no demolition to rehabilitate the homes of FEC residents, Related and Essence have decided instead to demolish every single public housing unit and develop thousands of luxury market rate units on public land. To justify this unethical about-face, it was critical to hide behind the myth that this decision was resident- led instead of opportunistic and profit-driven. As a result, they carried out a misleading survey that made absolutely no mention of demolition or the proposal to build over 2,500 market rate units on FEC grounds (attached). Additionally, Related, Essence and NYCHA stated the survey was being overseen and audited by CHPC. Emails to The Legal Aid Society revealed that the only role they played was tabulating the results. There is no information about any oversight, such as controlling-for multiple submissions by the same individual and confirming resident addresses and household members. Additionally, anyone over the age of 18 could vote; there is no data about the number of households that participated in the survey, which is often touted as a legitimate vote...According to the FSOW2 the decision to demolish all of the public housing at FEC hinges entirely on this survey (attached), which was misleading and illegitimate in both its content and administration. The proposed project to demolish every building at FEC should not move forward on the basis that it is resident driven or supported. (Newman et al_260)

Response G.27:

See EIS **Chapter 03.0, “Process, Coordination, and Public Participation,”** for a description of the public engagement process that led to the Proposed Project, including a discussion of the survey. See also response to comment 4. Refer to **Chapter 02.0, “Project Alternatives”** for details regarding the Physical Needs Assessments conducted for the Project Sites.

Comment G.28:

And finally, the buildings themselves; we're told repeatedly that they're beyond repair. But where is the independent engineering study? Where is the structural assessment? (Law-Gisiko_081)

To say that our buildings are severely deteriorated and substandard is a lie. We have not been vacated. They're sick, disabled seniors and families who all live here. Stop exaggerating with your choice of vocabulary. My apartment is in livable condition. I get heat, no leaks, no mold. We have not had any fires due to electrical outlets. We cannot demolish buildings based on hearsay, just because NYCHA say so. Elected officials merely repeat the script that NYCHA tells them. Where is the confirmation? We are still requesting to see the obsolescence report. We need proof that we truly are deteriorating. In the court of law, the evidence is a must. They want to destroy well constructed buildings, solid and built to last. Our

buildings will not collapse, we are safe in our homes. We withstood hurricanes, earthquakes, and we are still standing strong and firm. (Miranda_035)

it's clear that the entire study has a framing bias. The document frames the existing buildings as "severely deteriorated and substandard" with language that emphasizes problems rather than potential. This sets up demolition as the logical conclusion, rather than presenting a truly neutral analysis. The involvement of development partners who stand to benefit from larger-scale redevelopment in the assessment process further suggests potential bias in how options were evaluated and presented to residents. The determination that some "critical outdated building systems cannot be upgraded sufficiently" is presented without independent engineering verification. There's no mention of consulting preservation experts or renovation specialists who might offer different assessments. As for financing issues, the DEIS claims that the level of funding necessary can't be achieved without demolition, but doesn't provide comparative cost analyses. It doesn't clearly explain why market-rate units couldn't similarly fund rehabilitation rather than only supporting new construction. Further, the financial benefits of the increased density appear to drive the proposal more than resident needs. Finally, the DEIS states that resident leaders "worked with the PACT Partner to identify alternative development solutions" after the assessment found issues. This suggests the options were developer-guided. (Ott_080)

The DEIS lacks any publicly available documentation, including an independent third-party physical needs assessment, to substantiate the claim that the existing Fulton and Elliott-Chelsea campus buildings are "crumbling," "severely deteriorated," and "substandard." While acknowledging "persistent issues" such as mold, leaks, lead-based paint, and outdated building systems, the DEIS fails to recognize that these challenges are not unique to public housing and are routinely addressed in privately owned structures throughout New York City without resorting to wholesale demolition (Lunke_076)

We are told to believe that the cost of rehabilitation doubled between the developer's response in 2021 and 2023, in the space of just two years. Needless to say, no backup is provided to substantiate these numbers. It is clear that they are invented to support the argument that demolition and reconstruction are the only "feasible" alternatives. The DEIS should provide audited data that shows the actual cost of rehabilitation (Burney_272)

I am opposed to the demolition of the Fulton and Elliott-Chelsea NYCHA developments as outlined in the DEIS. I think the project is just too big, out of scale and overwhelming for our Chelsea neighborhood. The less expensive, less environmentally destructive option of rehabilitation is really the best way to solve the troubles in these houses. Honestly, I do not trust this private developer to have our community front and center in their mind. A simpler solution can be found without relocating thousands of residents over years and years. The buildings are well built, they can be renovated! Make rehabilitation the preferred alternative, and return to the community with a plan that prioritizes the health, stability, and dignity of public housing and Chelsea residents. (Citarella_300)

How will NYCHA avoid the potential liability from its intentional segregation of all the existing public housing tenants, the majority of whom are Black and brown people of color, elderly and disabled, into six high-rise densely packed buildings without violating Title VII of the Civil Rights Amendment, 42 USC Section 1982 and the Fourteenth Amendment prohibition against racial segregation? (Polletta_268)

Is NYCHA mandated by law or regulation to follow certain criteria or eligibility qualifications in selecting a RAD/PACT partner? (Polletta_268)

What criteria, eligibility standards or qualifications has NYCHA followed, employed, used or applied in making its selection of Related Companies and Essence Development as RAD/PACT partners? (Polletta_268)

What are the names of the principals of the Elliott Fulton LLC referred to in the Executive Summary of the Draft Environmental Impact Statement (DEIS)? (Polletta_268)

What are the specific details of each and every contract, memorandum of agreement, memorandum of understanding between NYCHA and Elliott Fulton LLC relating to the subjects covered in the DEIS for the Fulton and/or Elliott-Chelsea houses? (Polletta_268)

Will NYCHA provide copies to the public before initiating or implementing any action on this project of any and all written materials which refer to or constitute agreements, understandings or memorandum of agreement or memorandum of understanding between NYCHA and Elliott Fulton LLC regarding the disposition, by renovation or demolition, of the FEC houses by Related Companies or Essence Development? (Polletta_268)

What are the specific details of each and every contract, memorandum of agreement, memorandum of understanding between NYCHA and Related Companies and Essence Development relating to the subjects covered in the DEIS for the Fulton and/or Elliott-Chelsea houses? (Polletta_268)

Will the NYCHA make public the complete terms of the agreement between NYCHA and Related Companies and Essence Development that resulted in Related/Essence becoming RAD/PACT partners? (Polletta_268)

What is the date of the RAD/PACT agreement for this project? (Polletta_268)

What are the specific terms of each and every contract, memorandum of agreement, memorandum of understanding between NYCHA and Related Companies and Essence Development relating to the cost of demolition for the rezoning plan of the Fulton and/or Elliott-Chelsea houses? (Polletta_268)

What is the Elliott Fulton LLC and what relationship does it have to the responsibilities referred to in the DEIS? (Polletta_268)

What are the specific terms of each and every contract, memorandum of agreement, memorandum of understanding between NYCHA and Elliott Fulton

LLC relating to the responsibilities referred to in any portion of the project referred to in the DEIS? (Polletta_268)

What are the specific details and terms of each and every contract, memoranda of agreements, memoranda of understanding between Related Companies and Elliott Fulton LLC? (Polletta_268)

Is NYCHA in possession or have custody of an assessment of the condition of each of the buildings on the Fulton and Elliott-Chelsea campus that identify or relate to the conditions of the apartments, the potential building code violations, the relative costs of the needed repairs to bring the building up to code or any other criteria relating to how to correct or improve the conditions of the buildings including but not limited to systemic engineering improvements in the elevators, the heating and air conditioning of the buildings and providing tenants with upgraded kitchens and bathrooms? (Polletta_268)

What criteria did NYCHA employ to select Related Companies from the three bidders submitted bids to the RFP for Fulton and Elliott-Chelsea renovations? (Polletta_268)

Who are the affiliates of the Related Companies and Essence Development referred to in the DEIS as the PACT partners? (Polletta_268)

Will NYCHA provide copies to the public before initiating or implementing any action on this project of any and all written materials which refer to or constitute agreements, understandings or memorandum of agreement or memorandum of understanding between NYCHA and Related Companies/Essence Development regarding the disposition, by renovation or demolition, of the FEC houses? If the answer to the forgoing question is in the negative, why has NYCHA not made the documents available to the public? (Polletta_268)

Will NYCHA make public the current list of the addresses of each and every vacant apartment in the Fulton Elliott-Chelsea houses? (Polletta_268)

When was the last count or listing of vacant apartments compiled by the NYCHA of the buildings on the FEC campuses? (Polletta_268)

Response G.28: The information requested in these comments is outside the scope of the EIS.

Comment G.29: I am humbled to express my support for the rebuilding of NYCHA Fulton Houses. Over the years, I have experienced several issues not only to my apartment but to the entrance and the state of the building. I don't feel safe living here as much as I did in 1996. There's a lot of drugs and shootings in the surrounding areas of this Fulton Houses, and a lot of non-residents entering the buildings and smoking weed and doing apparently dangerous drugs. Homeless is also a major issue here. The buildings are not safe anymore. The residents including myself have water interruptions on a daily basis and elevator outages. During the winter seasons, the apartments lacks proper heating. The buildings are old and needs a lot of repairs. I wholeheartedly support the initiative to rebuild bigger and better. (Campbell_002)

I'm full support of demolition. The saddest part about this, I'm born and raised in Chelsea, I have never heard so much racism against black and brown families who are living in disgusting conditions that, just like the gentleman said, come live there when the construction come live there now. Don't wait for the construction. We have terrible elevator service, pee, doo doo, we have no heat in the winter, we have no hot water all year long. I had a building, the same building that's supposed to be constructed, the first one building 11, four months without any consistent hot water. So imagine those children that had to go to school with hygiene issues and were being bullied by their classmates because they couldn't take a decent bath. Okay? (Acavedo_437)

I applaud the compassion of many who want to preserve the projects. My vantage point is quite different. Since we live in a prime real estate location, Chelsea has elevated the look of the surrounding area over the years and then the old dated brick projects stand out like an eyesore in a progressive region like Chelsea in NYC within all of the new and current beautiful surrounding buildings. I don't fear change. An upgrade is needed in my opinion. I embrace progress. Sometimes we must decide to let go of things that no longer work for us. There are many issues in the projects that require constant attention. The time span of 16-30 years is more than enough time to figure out and make arrangements as to what one decides to do because the demolition will happen, and many of us may not be among the living. (Acavedo_437)

I'm full support of demolition. The saddest part about this, I'm born and raised in Chelsea, I have never heard so much racism against black and brown families who are living in disgusting conditions that, just like the gentleman said, come live there when the construction come live there now. Don't wait for the construction. We have terrible elevator service, pee, doo doo, we have no heat in the winter, we have no hot water all year long. I had a building, the same building that's supposed to be constructed, the first one building 11, four months without any consistent hot water. So imagine those children that had to go to school with hygiene issues and were being bullied by their classmates because they couldn't take a decent bath. Okay? (Acavedo_437)

My name is Rosemary Garcia and no one's talked about ADA apartments and how they're going to help the homebound people. Also generators. Also, I have paperwork in for my hip doctor to actually do a shower in my bathroom. And I was told the pipes wouldn't withhold a new shower, so they can knock out my tub. We need the demolition. (Garcia_444)

And I am in support of a new development for the destruction of this. We have been disinvested for so long and ignored for so long. NYCHA is not taking care of the buildings as best as they should have. So now this is an opportunity to have something beautiful and new, with great amenities, and we deserve that. We deserve it. (Velez_479)

I can tell you that my conclusion is that demolition is required because there is no way that you can actually rehab this place and have it function properly...There is no possible way to rehab this place. I don't look forward to having demolition go

on for 15 years. The pollution, the noise, and all the rest of it, all of which is set forth in the DEIS, much of which cannot be mitigated sufficiently. Nevertheless, I think that we need to have these new buildings. I look at the future and I won't be alive long enough to see it all happen, I'm sure of that, but for the short term that I am here, I look forward to having a better place to live. (Noble_461)

I am for the demolition for the simple fact that there was a hole right at the bottom of my staircase that was rotting out, that my child's foot actually got stuck in. I've actually been bitten by a mouse just two days ago. I was woken up when three mice were fighting and pounced on the top of my head in the middle of the night. I am living in deplorable conditions, and I would invite any of these people that are so opposed to the rebuild and so opposed to seeing our families thrive to just come to my apartment every single day. You don't have to live here. You can come here and witness and actually help me rebuild, then help me figure out a way to fix this issue because I can't. (Montalvo_459)

So if we're getting promised that we will have brand new buildings and repairs, I think that's the best bet...So hopefully, with getting a brand new building and community, that it can change the people's mindset of the community to be more positive and uphold the new their new surroundings in community. (Moore_460)

I have serious concern about how these PACT renovations will hold up, not just today, but five or 10 years down the line. Many are already showing signs of wear and failure right now. They might look better on the surface today, but these hidden problems are waiting to resurface, and then we'll be right back where we started. This is exactly why new buildings matter. Our families deserve better than short term fixes. We deserve lasting safety, quality, and peace of mind. (Vasquez_019)

Response G.29: Comments noted.

Comment G.30: I have a concern cause I drive and have parking. If they renovate or demolished and do other buildings can you please let me know if the parking will be available with the new buildings . It would be unfair as there's many people who drive and need parking lots (Rosario_012)

Will the Chelsea neighborhood have a parking? Will you have another zoom meeting? Regarding the development or any updates. (Rosario_283)

Response G.30: As described in EIS **Chapter 02.0, "Project Alternatives"**, as part of the Proposed Project under all of the feasible alternatives, the existing 95 accessory spaces currently on the Fulton Houses Project Site would be replaced and one additional parking space would be provided for a total of 96 parking spaces at Fulton Houses.

Comment G.31: The replacement units will not be like for like. The square footage will certainly be much less for each household, as the 1960s buildings were among the last in New York to enjoy livable space. I myself have a bedroom that is far from the living room. That will not be available today. Rather than spread out over seven buildings across two campuses, we public housing residents will be relegated to the edge of the current Chelsea Houses campus and cramped into three even taller

buildings. Instead of facing no one across the street, many of us would be looking out our windows at each other. (Lee_015)

Response G.31: The size and layout of apartments is beyond the scope of the EIS.

Comment G.32: I worry that the housing that is here now and Fulton and in Elliot- Chelsea will not be fairly replicated in the new buildings. (Hughes_017)

Response G.32: See response to comment 5.

Comment G.33: When you say that the supermarkets, I think are 12,000 square feet or something like that, people don't understand that what that means is that's maybe divided by two, which means that it's 6,000 square feet. And when you look at it in terms of west side Western Beef, you're looking at a space that's smaller than Western Beef, so, you know? And that's really, really, really tiny. (Robinson_018)

Response G.33: All development alternatives include the introduction of supermarket uses, which is intended as part of the development program, at the Project Sites, with facilities anticipated to be located on each of the two Project Sites. These are intended to serve the immediate surrounding area.

Comment G.34: So again, I ask, where are our electeds? Do any of them have the courage to rethink their stance, which they must recognize is a land grab for the valuable acreage that the NYCHA buildings currently occupy, and join their constituents in opposing demolition? (Wolff_057)

Response G.34: Comment noted.

Comment G.35: Instead of presenting a transparent enumeration of environmental impacts for public deliberation, the DEIS preemptively determines significance, compelling readers to accept unsubstantiated claims of negligible environmental consequences. The sweeping generalizations employed to characterize the project's alignment with community needs under Public Policy, Neighborhood Character, Open Space, Public Health and Education, among other categories, fail to withstand scrutiny in the face of the community's palpable outrage at the proposed abandonment of four decades of urban planning principles in Chelsea. (Lunke_076)

I find it both cynical and troubling that the DEIS repeatedly cites so many areas of potentially and likely unmitigated adverse impacts that are "just under the threshold," a threshold that if reached, would subsequently require action or trigger a different approach. I must ask everyone who is part of this process to consider that even in your most meticulous and careful analysis of potential and logical adverse impacts, including noise, dust, pollutants, particulate matter, drainage, sewage, traffic and shadows, there will undoubtedly be periods when your careful calculation of "just below the threshold" will be violated. Perhaps it will be windy day, a terrible storm, an unexpected event, but it will happen. And given these razor-thin, and what I believe to be contrived, threshold margins, I must ask: Who will pay the price? Whose health and wellbeing will be compromised? Will it be a child, a senior, a medically vulnerable person who will be pushed over the edge by

the failure to acknowledge that these margins cannot be expected to hold and cannot possibly be monitored successfully through the mechanisms described in this document? I request that the DEIS publish a separate document, one legible and comprehensible by the entire community, that lists all the Adverse Impacts that fall just below the CEQR thresholds, for examination by the community at large, and particularly for the school communities. The goal would be to allow some outside assessments by experts in the areas of pollutants, noise, storm water, sewage, shadows, etc. that will help the community build trust with a project that will be in our midst and impact our lives for the next 16-25 years. What could possibly be more important than that? As someone who lives in the community adjacent to the NYCHA campuses, I deeply resent NYCHA's superficial and callow "Draft EIS Overview," published in March 2025, which we were told served as a summary for the elected officials (are they too busy to read the DEIS like the rest of us), and claims there are no adverse impacts in 13 technical areas listed. The fact that the DEIS manages to demonstrate, through careful manipulations of data sets, that there are no threshold-crossing Adverse Impacts in several categories, does not mean there will be no adverse impacts on the lives and wellbeing of the members of this community during decades of demolition and construction on the campuses. Please acknowledge this for the health and safety of our community, and reconsider the "feasibility" of Alternative 5, which will spare all of us these tremendous, unmitigated reductions in quality of life, and quite possibly, lifespan, in our beloved community. (Andre_056)

Response G.35: Comments noted.

Comment G.36: The inherent conflict of interest arising from a developer-funded environmental consultant and a politically aligned reviewing agency further compromises the integrity of the DEIS. The absence of an independent third-party analysis, particularly concerning the potential demolition of 24 buildings across the Fulton Elliott Chelsea campuses and the transfer of development rights to a private real estate firm with a questionable track record, raises profound concerns. (Lunke_076)

Response G.36: Comment noted.

Comment G.37: Economic Feasibility Going Forward in these Uncertain Times: Demo and reconstruction will only get more costly as a result of increased materials-costs due to the changes in U.S. trade policies and tariffs over the first 100 days of the Trump administration. Immigrants are essential to construction in New York. Again, recent changes in U.S. immigrant deportation policies are already negatively impacting construction projects promising delays and cost overruns. A phased rehab/renovation is a much safer bet! It is my understanding there are absolutely no guarantees that the project will be completed, and there has been no transparency whatsoever regarding financial liability and insurance if it is not. How will the NYCHA residents and the Chelsea community at large be protected? A phased rehab/renovation protects the community and the NYCHA residents from the very real financial risks to the successful completion of such an enormous project. The chaotic and punitive U.S. trade policies and tariffs initiated during the

first 100 days of the Trump administration are creating a new world economic order. How this will affect the markets and the real estate and construction industries going forward is unpredictable at best (although, most investment banks and financial analysts predict a 65% chance of a major recession this year), but I can promise you it won't be business as usual. Purely based on risk management considerations, now is not the time to take on a demolition and reconstruction project of this magnitude and length, especially when so many people's homes are at stake. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

Also, there's no concern about the \$1.9 billion and the existing tariffs. Will that become 2.5 billion or 3 billion? I haven't heard anything in terms of that. (Robinson_472)

What are the projected costs for the zoning and non-zoning demolition plans given the federal tariffs imposed by the Trump Administration? Has Related Companies or Essence Development provided NYCHA with any projections on the additional costs anticipated to be imposed on the project as a result of the increasing tariffs on imported goods? (Polletta_268)

The "No Action Alternative" presented in the DEIS fails to adequately explore the full spectrum of funding sources available from City, State, and Federal entities beyond HUD Section 9. A thorough analysis of line items in government budgets, excise taxes, and dedicated funds for public health, workforce development, climate change, and urban reforestation could potentially identify novel funding streams for the repair and maintenance of public housing. Addressing the funding crisis requires expertise and a genuine commitment to solutions, rather than simply assigning blame to existing conditions. HUD should not be regarded as the sole source of funding for public housing, given the initial and ongoing responsibilities of New York City and State in its creation and maintenance. These entities should serve as the primary financial pillars for repair and maintenance, with HUD funding acting as a supplementary resource... [C]oncerted lobbying efforts should be directed towards elected officials to secure direct state and local tax dollar allocation for FEC repairs and maintenance, perhaps through a Tax Increment Financing (TIF) approach. If TIF is deemed an acceptable mechanism for funding projects such as Hudson Yards, its application to the critical needs of public housing is even more compelling. (Lunke_076)

The decision of the federal government and its concomitant impact on the State and City resources, to reduce investments in public housing and tenant subsidies. (Brown_085)

So far, there has been no transparency in how this project will be financed and finished, so it is impossible to judge whether the "pie-in-the-sky" sales job our electeds have been peddling is even remotely realistic. I suspect it isn't. Given the public nature of this proposed development, there must be full financial transparency from start to finish. (Bosco_158, Cohen_183, Frame_156, Gutierrez-

Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

Who's taking care of the infrastructure, otherwise known as who's paying for it too? And the working and expanded sewer lines, the water lines, the power lines, and there's the issue of public land being turned over to private hands. (Shanley_048)

Response G.37: These comments pertain to matters that are outside the scope of the EIS.

Comment G.38: NYCHA also lied when it promised that any mixed income revenue would go into public housing repairs in the neighborhood in keeping with its bill to preserve policy. It now says, "All of it may go into NYCHA's general coffers for use across the city. Is it for this that Chelsea would be upzoned beyond recognition? Our city council member, Eric Bottcher, has stated his opposition to this and to the plan segregation of the NYCHA residents. Does NYCHA have any intention of addressing these concerns? I regularly attend CB4 meetings and NYCHA hearings on this proposal, and I have never once heard a member of the wider community speak in favor of it. The public perception is that NYCHA is milking Chelsea for every dollar it can, just like Related. Is this really how NYCHA wants to roll out a new financial model with a reputation for dishonesty and contempt for neighborhood character and opposed by the community? (Holowka_429)

We think New York City should continue to own the land. We oppose privatizing public land, which erodes affordability citywide and cedes control to private interests and away from the public's interests. We also think it is scandalous that the money from the 99-year lease to Related would primarily be used elsewhere and NOT in Chelsea. Chelsea is thus being exploited by NYCHA and the Developers with nothing good for Chelsea to show for it. After 16-30 years of suffering through demolition and construction, our reward is to be the ruination of our pleasant, breathable, relatively low- and mid-rise neighborhood. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

It seems like another boondoggle that will pour public money into private coffers for little benefit except to those private coffers! Demo is costlier financially, environmentally, socially, and medically than the more conservative and less profitable course of rehab/renovation. (Fischer_323)

NYCHA has stated that it may take all of its revenue from the project outside of Chelsea, abandoning its earlier promise to apply all such funds to neighborhood public housing. NYCHA gets to exploit Chelsea for cash, Related gets a gigantically larger project than the one it originally bid on, our elected officials who have drunk the YIMBY Kool Aid and left their constituents behind, get 3,500 more housing units, the great majority of which will be luxury and the rest only nominally affordable. (Holowka_429)

This land is public and should not be given to a private developer for the construction of luxury housing. (Gelb_363)

- Response G.38:** As discussed in EIS Chapter 01.0, “Purpose and Need for the Proposed Project,” one of the purposes of the construction of market rate housing units is to financially support the PACT portion and new affordable housing components of the project. Additionally, through on the PACT Program, NYCHA continues to own the land and buildings. More information regarding the PACT Program can be found here: <https://www.nyc.gov/assets/nycha/downloads/pdf/PACT-facts-english.pdf>.
- Comment G.39:** There has been no environmental impact study performed to evaluate the combined environmental impact of the proposed Western Hudson Yards development and the Chelsea NYCHA Projects. Clearly, the impact of all these projects together will have a significantly greater impact on the Community and the environment than the sum of their parts. (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)
- Response G.39:** As warranted by *CTM* and other applicable guidance, the EIS has analyzed the cumulative effects of the Proposed Project and other development projects in the various study areas analyzed in the technical analysis chapters.
- Comment G.40:** I am not a resident of NYC, but I am writing this comment to voice my support for this redevelopment project as a model for sustainable urban design. In reading through the EIS and the proposed actions for the redevelopment, I commend the careful considerations for natural and cultural resources included in the environmental assessment. Protecting endangered species like the Northern long-eared bat, as well as conserving water, air, and soil quality are critical considerations in any development project, and I support development that balances the needs of people and the planet. And in a similar vein, I think this project, if executed well, will benefit the people. The right to remain and right to return guaranteed by the NYCHA are essential to the success of the project as sustainable urban development. I am very supportive of affordable and mixed-income housing mixed with zoning that puts healthcare, economic opportunity, and community close to those in public housing. On paper this sounds like a great project. I would be interested in keeping with its development and holding it to the resident-driven vision it promises. (Brock_005)
- I am writing to express my strong support for the redevelopment plan for the Fulton and Elliott-Chelsea Houses. Beyond providing new homes for current residents, the redevelopment will create additional affordable and market-rate housing, helping to address the urgent need for more housing options in our city. It will also deliver expanded community facilities, much-needed retail opportunities, and open spaces that will enhance the quality of life not only for NYCHA residents, but for the broader Chelsea community as well. (Diaz_006)
- I work nearby to the Chelsea Houses (at 11th Avenue and 26th), and I support the redevelopment plan. The city needs funds to renovate these buildings and make sure they remain usable for residents, and adding market-rate housing is a great way to do so. It kills two birds with one stone--paying for the redevelopment of

public housing, and also adding new market-rate supply that will alleviate the city's housing shortage. Please move forward quickly with the plan. (Miller_146)

I urge HPD and NYCHA to swiftly move forward with the most ambitious proposal to give NYCHA residents new apartments and vastly improved living conditions and by building more housing in the heart of Chelsea to give more New Yorkers a greater chance at opportunity and a wonderful place to call home. (LeFrancois_217)

I am a NYC resident, and am writing to express my SUPPORT for redeveloping the Chelsea Elliot houses into new mixed-income housing. We need all the housing we can get during this housing crisis. I am disappointed to see so many people oppose this development based on specious concerns about environmental impact and noise pollution. (Bradway_368)

I want everything to be done new for the simple fact; we need more apartments. We need cleanliness, we need protection. We need just what you all want. The ones who don't, I mean that has houses. We want clean too, we want proper houses, proper apartments too. (Jones_021)

Response G.40: Comments noted.

Comment G.41: Adverse impacts of new-construction Alternatives that would be avoided by a Rehabilitation and Infill Alternative are not considered in the DEIS. Evaluate an honestly explored Rehabilitation and Infill Alternative in terms of these impacts [commenter lists a number of concerns with the feasible alternatives] and integrate them into a comparison with the other alternatives. (Holowka_429)

Response G.41: See response to comment 10.

Comment G.42: Please note the discrepancy between the availability of the full Draft EIS across multiple websites. The promoted project website (<https://www.fultonelliottchelsea.com/>) does not have the Draft EIS available. Multiple chapters are missing from the New York City Housing Authority (NYCHA) project landing page, and links to the chapters on the CDX digital depository (EIS # 20250033), to which the Federal Register directs the public are also missing. The only website with a link to the entirety of the document is available on the HPD Environmental Review Page, but only under the “Public Notices for NYCHA Projects” Section, not under “Environmental Impact Statements.” These discrepancies should be addressed prior to the publication of any further documents as it hindered accessibility to conduct a thorough review. (Austin_434)

EPA recommends including a table in the document that clearly displays impacts of the proposed project and mitigation measures being suggested. The included tables generally provide an indication of the existence of an impact but no detail on the nature and extent of the impact and therefore no way of assessing the efficacy of potential mitigation measures. (Austin_434)

Response G.42: All chapters and appendices are uploaded and available for viewing on the EPA EIS database, as required. Additionally, as Responsible Entity and Lead Agency, all chapters and appendices are uploaded on HPD's website. The discrepancy was adjusted on NYCHA's webpage. Where possible, the mitigation measures should be quantified to demonstrate the reduction of impacts in connection with proposed mitigation measures. EIS **Chapter 05.21, "Mitigation,"** presents the proposed measures to fully or partially mitigate impacts to shadows, historic and cultural resources, transportation, construction transportation, and construction noise. As indicated in the chapter, the partial shadows mitigation consists of quantifiable lighting improvements to Chelsea Park that would improve usability of the turf field. The historic and cultural resources partial mitigation would be qualitative in nature. The transportation and construction transportation mitigation measures, where they are feasible, are quantified as explained in the chapter and consistent with *CTM* guidance. The construction noise partial mitigation measures are discussed in the chapter and the text notes that while they would reduce the peak construction noise, interior noise levels during construction at impacted receptors would still exceed the acceptable thresholds for residential or community facility uses. Per this comment, Table 05.21-1, Summary of Impacts has been added to the chapter and is also part of the Executive Summary, as Table 00.0-37.

Comment G.43: Then the illustrations of 'roof to gardens'? Where are the railings ? Railings please! (Shanley_345)

Response G.43: Comment noted.

Comment G.44: When will the video of the DEIS for Fulton and Elliott Chelsea be posted? (Keitt_455)

Response G.44: The video of the online DEIS hearing will be available on the project's environmental review website.

Comment G.45: This is a common-sense project that benefits the existing residents of the Fulton & Elliott Chelsea Houses, the broader Chelsea community (of which I am a part of), the city of New York (by creating more affordable housing), and the world as a whole due to the low levels of carbon emissions that future residents will have. I strongly support this project and hope it is built without delay. (Deutsch_369)

I am writing to strongly support the proposal for Fulton and Elliott-Chelsea NYCHA developments as outlined in the Draft Environmental Impact Statement (DEIS). Building new homes for NYCHA residents and then moving them in while building future mixed-income housing is the best thing we can do for the environment by building in-fill housing near transit. Buildings don't last forever, and we need to demolish and rebuild when the issues are too much to fix. I urge HPD and NYCHA to accept the current proposal. This plan is supported by NYCHA residents and I trust them to have made the best choice for them. (Lavingia_371)

I live in Chelsea on 17th right next to the Fulton Houses. Don't listen to the NIMBYs and please redevelop them into denser, transit oriented development with

good green space. NYC needs as much mixed income housing as it can get and this is a great opportunity to build more. (Halev_110)

Response G.45:

Comments noted.

Comment G.46:

I am deeply concerned about any diminution of public housing in NYC, either permanently or over a long period of time called 'temporary.' We see an increase of unhoused people on the street and on MTA and in its facilities. This problem is likely only to increase over time. Housing prices continue to rise: making purchase unreachable for a majority of New Yorkers and rentals, though controlled by statute, more dear. NYCHA consists chiefly of buildings constructed using public capital from the New Deal to the Great Society. As dilapidated as some of the complexes have become, they are also a great asset for families and individuals who want to continue to live in NYC but don't command wealth or income that allows them to acquire housing on the private market. I have seen publicly owned land recently alienated to private developers in exchange for meager public benefit. I believe strongly that this must stop. This publicly owned land and these publicly own buildings are a necessity in our City. Over a long life, I've seen families living on the street as a last resort; first in Asia and Africa and more recently across the United States. New York City must draw the line. (Forsythe_203)

The alternative of rehabilitation and infill has been dismissed without serious consideration, despite being more cost-effective, less disruptive, and widely supported by tenants and community members. Even though most elected officials do the bidding of Open New York and the City's developers, working people of NYC see very clearly there is no housing shortage, but a failure to protect and maintain our low income and rent-stabilized housing. What we do see is a lack of political will to embrace community-led, rather than developer-driven development. And, we see through the developer-fed "supply-and-demand" argument that more luxury housing begets more affordable housing. Working people are waking up to the corrupt and rotten nature of this alliance between the City and real estate interests. (Anderson_408)

I think that demolition of these buildings is unnecessary and wasteful of money and resources, including the environmental impact of all the buildings material disposal. (Hughes_017)

There is a no-demolition alternative that is entirely feasible, half the price and it wouldn't turn our neighborhood into a construction site for the next 30 years. The residents of the Fulton/Chelsea Houses deserve well maintained homes. Demolishing their homes and privatizing the land is a lazy solution in the name of "public housing preservation" and it does not serve the residents of Chelsea. Renovation is a much cheaper solution but there needs to be a commitment to really do it and do it well. It would be less invasive, less polluting and better for our neighborhood. Embrace this Non-demolition alternative and let's do that!! (Citarella_010)

I support building more public and private housing in the city, because supply must be greatly increased to balance demand. However, the existing NYCHA buildings

are already high-density apartments, having more stories than most other buildings around us. It'd be so wasteful to tear them down. (Lee_015)

So many have called this privatization plan a land grab. It's clear from the DEIS that the bad far outweighs the good; loss of open space, loss of mature trees, loss of all the grounds, drowned community in shadows, increased traffic, 15 to 30 year construction timeline, the release of toxins and metals. All of this is going to hurt the tenants and it's going to hurt the community. We are the ones who are going to suffer, not just the tenants, the whole community will suffer. The DEIS downplays the devastation that this project will have on the lives of thousands of us. (Polletta_031)

But now when I hear the word demolition, and when I hear the word demolition again, my life and my heart break because the demolition mean destruction and destruction is finished with dreams and needs of a lot of people. I think most of the people who live here need a roof, need to be in ambience, you know, because otherwise, the fear comes to us. When I say us, I'm talking about myself. Just think that destroying this awesome view where I live will cause me a lot of ghosts lot of ghosts. So please think over and most of all, please wholesomely give me a center who I love dear, who I come almost every day, who imposed me to become an artist, to paint, to learn and share with other nice people and give us a dish of food, most of every day. So please don't destroy, don't destroy what it took so long to build like this beautiful center, center who have a lot of charm, a lot of education, and very nice people around. Please be share, be fair. And remember the seniors in one, we always will win. (Rivera_032)

I've lived here, brace yourself, for 70 years. I was here when the when these project buildings were built. I was here before they were built, and I watched the old lot tenement houses that existed before that, that were filled with rent regulated tenants destroyed in order to build these buildings. It was a brutal experience, and it promises to be another brutal experience when these buildings come down unless we are able to stop it. (Wolff_034)

This plan is reckless, unnecessary, and harmful to public housing residents. The developers are the only ones who stand to benefit from this proposal. There are many misleading aspects to this Environmental Impact Statement. In the DEIS, they are claiming that rehab is an inconvenience. How is it that noise obstruction, congestion, and harmful toxins from a construction site is not an inconvenience? Residents will have their entire lives upended if this demolition proposal goes through. Not only is demolition harmful to the community, it is also economically risky. Demolition will cost nearly \$2 billion according to Related's latest estimates, almost double the cost of renovating the buildings. We now know that NYCHA and the developers misled the public into believing that demolition and rebuilding was going to be cheaper than rehabilitation. These costs are very likely to rise as each month passes due to inflation and other economic uncertainties. There is nothing in this draft that talks about the reality of this project not being completed due to high costs. What will the residents be left with if Related in essence can't

complete this project? This is financially reckless and will have a grave impact on our community. We, the residents will be sacrificed. (Miranda_035)

When Robert Fulton fought for this land, he didn't think that there would be so many traitors who were going to be trying to tear down what he fought for. NYCHA was given 35 million to renovate these apartments and they're not doing anything. And now the guilt the tenants are the ones who are being called guilty. How is it that they're being given all of this money and not doing anything for the renovations? It's delinquency. How is it that we have 11 buildings that are great and they want to tear them down to create rubbish for us. This building these buildings are only about 60 years old, some not even 60 years old. There are other buildings that are over 100 years old that the city took down, but they only took them down because they stood to gain a profit. So why are they going to take ours down? So, we're not going to pay for the corrupt who are doing this for the money, we, who are the ones in need and being called at fault. I don't want these buildings to be torn down because this is a community where we all know each other. So, I don't want the community and the buildings to be torn down. (Ramirez_036)

We need to see that these NYCHA people, and the people who live here are human beings and they deserve the dignity and keeping their homes is what they need to do. Demolition is not the answer. Destroying people's homes, moving people away, and bringing very wealthy people into this community so that they somehow can have all these houses rich houses. Related is not your friend. He's NYCHA. They're not doing this for fun, they're doing it to make money. And they are making million, million, millions and billions of dollars doing this project. So, this is not funny and we need to preserve what we have here and fight for you and fight for all of us. (Ortega_040)

These buildings should be renovated, not destroyed. Demolition is a bad disaster for the Chelsea community with disaster for the with disaster for the demolition traffic that will be gridlock. Pollution will make us sick, noise will be unbearable, and our children's playground will never have sunlight. Chelsea will be transformed from a low rise to 2 to 2 39 story towers. And rents will increase because of the luxury housing in construction. This will take 25 years, that's 25 years that we are going to have to deal with pollution, noise and all other kind of stuff. On top of that, I want the No Action Alternative for our public housing. (Lara_210)

Do not demolish, this is our neighborhood. This is our home. And this will have to be our home until I die. (Martinez_042)

I'm in support of preserving affordable Section 9 housing, non destruction of the buildings. They can be renovated. (Rodriguez_043)

We don't have any friends here in the political system too. Hoeman, Nadler, Simone, Bottcher, they don't care. They don't care whether they want to serve the developers. All these politicians. There's very few that we have for friends. Most of them want to serve the developers. They have such power over this city. And the only way we're going to do anything at all is to come together like a tight knit family. Okay? I'm for you, I hope you're for me. We need our healthcare; we need

our housing. 350,000 people out there homeless. Okay? They've got 5,000 empty apartments, they live empty. There's a lot of warehousing going on. 350,000 people homeless. Okay? I remember when it was back 59 and we were screaming 59,000 in the shelters... You are stripping us down and you're destroying housing and you're gentrifying people out of their homes and it's got to stop. (Mudd_045)

Affordable houses, I am living 30 years in Fulton houses that I no want to destroy the Fulton housing in the community. No one to destroy this situation. They want to make it here. They never wanted nothing to destroy for Fulton housing. The town, they had to go out or from the management to go to protect them. Then they said no, and all politic here, they had to be stopped. They say the Fulton house and they destroy. And they had to put all the family. They have to protect the family that we have many years in Fulton housing. (Guzman_046)

To many of us in the community, as others have said, Related's new plans look like a land grab, moving public land into private hands, to the ultimate detriment of the community. Again, we reject the demolition and reconstruction proposals and support rehab and renovation for some of the following reasons: This community suffered many years of snarled traffic, noise, dirt, and light pollution, during the building of the Eastern Hudson Yards. Related's 10 year estimate for demolition and reconstruction of the NYCHA properties portends far, far worse. Demo and reconstruction is costlier and logistically harder and more disruptive to the community and to the NYCHA residents themselves. A phased rehab renovation protects the community and the NYCHA residents. (Spinner_051)

Modern best practices favor low rise, mixed income, human scale housing. The super tall buildings proposed by Related are anathema to the residents of this neighborhood, and the significantly diminished public outdoor green space is a sin. I repeat; stick to the original community supported plan, rehab, renovate the Chelsea Elliott National Housing. (Colon_280)

I write to oppose the demolition of and to call for the rehabilitation of the existing Elliott and Fulton Houses in Chelsea. Affordable housing is a public sector right and stronghold. Private development destroys communities, families and individual lives for the sake of profit. (Guttu_095)

I urge HPD and NYCHA to reject the current proposal, make rehabilitation the preferred alternative, and return to the community with a plan that prioritizes the health, stability, and dignity of public housing residents. I live in a different neighborhood than the planned project but do live near two NYCHA sites. Now, more than ever, public, affordable housing needs to remain a public resource not an opportunity for developers to reap financial benefits. (Brecker_100)

NO DEMOLITION (Martinez_104)

The proposal to demolish 24 public housing buildings and replace them with luxury towers is not only environmentally destructive — it is socially irresponsible. The alternative of rehabilitation and infill has been dismissed without serious consideration, despite being more cost-effective, less disruptive, and widely supported by tenants and community members. (Pettibone_105)

I live in Chelsea and I am opposed! (Yudell_109)

The EIS will address the following alternatives and consider whether they meet the purpose and need of the Proposed Project: (1) a No Action Alternative without any demolition of existing units or PACT conversions; (2) a Rezoning Alternative with new Section 8 Project-Based Voucher (PBV), affordable housing and market rate housing; (3) a Non-Rezoning Alternative with new Section 8 PBV DUs, affordable and market rate housing; (4) a Midblock Bulk Alternative that would be a variation of the Rezoning Alternative but would shift bulk to the middle of the Fulton Houses Project Site; (5) a Rehabilitation and Infill Alternative which would involve the rehabilitation of existing NYCHA dwelling units (DUs) and conversion to Section 8 PBV DUs through PACT as well as two new infill buildings on the Fulton Houses Project Site and one new infill building on the Elliott-Chelsea Houses Project Site; and (6) a No Significant Adverse Impacts Alternative, to determine if an alternative that can meet fully or in part the purpose and need for the Proposed Project can be implemented without resulting in any significant adverse impacts.

I am opposing demolition of Elliott-Chelsea Houses and Chelsea Addition and support a transparent community process that centers around repairs, preservation and maintaining a healthy environment. (Waddell-Steele_111)

I've been living here for over 55 years. I was raised in this apartment, I raised my 3 sons in this apartment. I share the apartment with my son who has cerebral palsy and I'm a senior citizen. We love this resident and it's area. We oppose this demolition and request a transparent community- led process that centers repairs and preservation and environmental justice. This is our home, our lives. We don't want to lose what we've been living with to satisfy overall greed and power of the rich demand of property value. Please, there are many low income tenants that will agree with not having our Chelsea-Elliott Development NOT BEING TORN DOWN. Please do not demolish our homes. (Decena_122)

Collectively we know: The majority of tenants from the Elliott-Chelsea and Fulton House tenants are for 'no demolition.' The pro demolition residents are very much the minority, but have been allowed to represent the majority to manufacture consent for a plan that will hand over a very large land mass, rip up trees and green spaces, decrease the public housing footprint— when we so desperately need it— and displace people who have called Chelsea their home for years if not decades. You have a petition, plenty of testimonials at City Council hearings, forums, webinars, and meetings confirming as much. Residents, neighborhood and block Associations, advocates, political clubs, architects, engineers, and legal, zoning, and land use experts, stand firmly with the public housing tenants to be free from threats, harassment, and uncertainty of losing their homes, and support the 'no demolition' policy. The lies, manipulations, and running roughshod over the tenants are duly noted. Guarantees of security are not worth the paper it's printed on. Yet, the Related Companies, with a little help from their friends, persist with their demolition plan; even though the cost of demolition far outweighs any renovation estimates. Councilman Bottcher, Representative Jerry Nadler, Senator

Brad Hoylman, and Assemblymember Simone are supporting Related and NYCHA's plan to gentrify people out of existence. HUD, far from an independent voice, participated in an Environmental Impact Statement with NYCHA to pursue Related's demolition agenda. (Mudd_430)

I write as a regularly voting US citizen and resident of NYC in opposition to the proposed demolition of the Fulton and Elliott-Chelsea NYCHA developments (as outlined in the Draft Environmental Impact Statement). I am very concerned about the decades of immense environmental impacts of the project, indicated in the DEIS, which will harm local residents, those (like myself) who habit the area, and the ecosystem of the area. I am also outraged by the injustice, at a time of critical housing need on the part of ordinary residents of NYC, to replace public housing buildings with luxury towers. This is absolutely unacceptable – and, of course, not supported by most residents of the area. Instead, please prioritize rehabilitation of the developments. (Byrne_136)

You need to listen to the people who live here, who work here, and to whom this demolition would be disastrous. Fix the buildings up instead of always wanting to tear things down. And level with people; this is for DEVELOPERS gain at the expense of the community. WE SAY NO TO DEMOLITION. WE SAY YES TO IMPROVING OUR APARTMENTS AND OUR COMMUNITY. (Swietnicki_142)

I am writing to strongly oppose the proposed demolition of the Fulton and Elliott-Chelsea NYCHA developments as outlined in the Draft Environmental Impact Statement (DEIS). It's clear from attending multiple meetings and forums on the subject that Related has been pushing the narrative that no form of renovation is viable and that only a complete deconstruction and re-build is possible. This now appears to be in serious doubt and as residents and property owners within spitting distance of the Fulton Houses, we deserve a proper and accurate accounting of all the feasible options and not just one that is convenient for Related's interests. Please don't doom our neighborhood to 15 to 30 years of construction. Its utter madness to even contemplate such a proposal given the enormous upheaval it will cause to thousands of NYC residents. (Sloss_152)

We are urging you to oppose demolition of the Fulton-Chelsea NYCHA buildings (Campuses) in Manhattan AND call for a transparent and community led process that centers on repair, reservation and environmental justice. (Kane_157)

I urge you to oppose demolition and call for a TRANSPARENT, COMMUNITY-LED process that centers on repair, preservation, and minimal environmental impact. (Cote_169)

I am opposed to the Demolition of both Fulton and Elliott-Chelsea houses. I support a plan that improves the interiors and maintains the Chelsea Neighborhood. (Feld_176)

However, there is no need for this massive demolition project due to the existing Fulton and Elliott-Chelsea buildings are still structurally sound. There is no doubt that improvements and repairs are in order which will cost less, less environmental

adverse impact and would conserve the Chelsea neighborhood. Segregation of existing tenants from market based tenants is discriminatory as separate is not equal. There is no need to construct 39 story buildings which would block out light and result in dust, poor quality air, years of noise and create hardship on Chelsea residents. Chelsea, as is now, not that affordable and working class and middle class people would be forced out of Chelsea. If the developers had any genuine concerns about their plans, they would never have proposed to build 39 story buildings in the first place. They have no concerns for others; just for their own profits. (Feld_177)

NYCHA's plan to destroy a neighborhood and shove all its residents into 6 towers is fostering a new kind of segregation. It is against trends of our inclusive society. It ought to be banned. And should be. We are giving away land to people who don't need it and are capable themselves of doing their own business. It is a poor exchange for getting housing, (Haselkorn_187)

I oppose the demolition!!!! (Lee_202)

The demolition of the present living spaces will be a significant setback to the future development of our community and our city as we know it. (Montalvo_213)

I oppose demolition (Ocasio_230)

Years of noise, dust, and dirt imposed on tenants, the majority of whom are opposed. A combination of Robert Moses and Putin. Insanity and viciousness. (Karan_233)

Please do not demolish these buildings. We need housing for low income folk now, so it's important to finance the repairs instead of demolishing and replacing. (Bialik_235)

I implore you to reject the Demolition and Reconstruction proposals for the Fulton and Elliott Chelsea NYCHA Housing. (Erdogan_293)

I'm against the demolition there's no need for it and if they were smart they would just fix what they need to fix. (Unnamed_330)

I implore you to reject the Demolition and Reconstruction proposals for the Fulton and Elliot-Chelsea NYCHA Chelsea properties. (Flanigan_337)

I don't appreciate my home being destroyed by no one .I love my home I take very good care of it. and I feel it's a lot cheaper to fix instead of demolish (phyllis814_346)

Am against the demolition of Fulton and Elliot-Chelsea housing (Regal_364)

NO DEMOLITION for ROBERT FULTON HOUSES. KEEP PUBLIC HOUSING PUBLIC. (Ortiz_370)

Thank you for standing with us-and for standing up for public housing, climate resilience, and the right to remain. (O_372)

No to the demolition of the building where I've lived for years, I am an adult and disabled person and I need my home. (Rosario_384)

We urge you to stop discussing demolition. The residents of Chelsea do not want to enrich developers like Related by destroying public housing. Public housing must remain public. We demand that the Chelsea Houses be preserved and renovated, not demolished. (Immergut_394)

Your plan to destroy 24 public housing units is nothing but INSANE, including the following construction period of 16 to 30 years!!! a leeway of 15 years!!! That just means you have NO PLAN but to destroy Public Housing and replace it with Luxury!? I say, "get the hell out of government, you leeches!" (Reyer_405)

I urge you all to oppose demolition and call for a transparent, community-led process that centers repair, preservation, and environmental justice (Mills_407)

Do not demolish Chelsea NYCHA bldgs. Thank you. (Shorr_415)

I opposed the proposal to demolish the Fulton and Elliott-Chelsea Houses and erect high-rises with no public input. Redevelop the areas in a more holistic manner. (Gillen_421)

I as an Elliot Chelsea as well as many others who do not want the demolition. There needs to be transparency, a community-led process to centers repair, and environmental justice. I never voted for this, there is no need for this demolition, it would do more harm than good, we are not animals. (Tomas_423)

I oppose the demolition and hope to establish a transparent, socially driven process centered on maintenance, protection, and environmental justice. (Lu_424)

I oppose the demolition and call for a transparent, community-led process that centers repair, preservation, and environmental justice for the Fulton Houses. (F._425)

This demolition is going to be a monstrosity in our community. The noise, the rats, the pollution, the traffic, 370 mature trees. This demolition is supposed to take 16 to 30 years. We're going to have shadows, probably in our children's park. I don't want demolition. I've raised my family here, and now I'm helping to raise my grandchildren. And I would like to have no demolition on NYCHA, period. (Lara_210)

The environmental impacts presented in the DEIS, that include unmitigated noise, severe shadow impacts on the parks and schools, and increased traffic congestion, are harms that would last for decades, with construction projected to continue for at minimum 16 years. I'm here to urge HPD and NYCHA to reject the current proposal and make rehabilitation the preferred alternative and return to the community with a plan that prioritizes the health, stability, and dignity of public housing residents. (Buchanan_070)

And also in 2019, Fulton Houses had a survey where, I think it was 633, like over 60 percent of the heads of households of those tenants that voted and decided that there was not going to be any demolition. And that survey seems to be very, very ignored. And also Fight for NYCHA, with six tenants from Fulton and Elliot Chelsea, filed a lawsuit several weeks ago in state court, and that lawsuit asserts that such a massive development radically gentrifying the neighborhood, which

will displace tenants and have a horrific adverse on health, must go through ULURP. And we believe the law's on our side. (Halasa_447)

I just want to point out that our infrastructure has been sustainable with proper inspecting and repairs. So let's get back to our maintenance. That's where we failed at. Let's get back to that...We have not voted for demolition. My neighbors and I do not want demolition and our family do not want demolition. (Lugo_321)

I'm against the demolition. My apartment needs to be renovated, not demolished. The demolition will hurt tenants' air quality and my community. In my building, there are vacant apartments that right now can be that are right now being renovated. So this can be done. With private developers, tenants' apartments will lose important rights and protections. You hear that? Important rights and protections that you guys already have right now, which are available and protected with Section Nine, Public Housing. HOU, RAD/PACT, Essence Development, and Related are here because it's a land grab. They want us out and they want this us to be out and not come back. So that's it. (Perez_467)

I am a longtime Hell's Kitchen resident writing to strongly oppose the proposed demolition of the Fulton and Elliott-Chelsea NYCHA developments as outlined in the Draft Environmental Impact Statement (DEIS). The environmental impacts presented in the DEIS — including unmitigated noise, severe shadow impacts on parks and schools, and increased traffic congestion — are unacceptable. These harms would last for decades, with construction projected to continue for 16 to 30 years. The proposal to demolish 24 public housing buildings and replace them with luxury towers is not only environmentally destructive — is an outrage! As is NYCHA and the City's modus operandi in these privatization battles, the Fulton and Elliott-Chelsea residents were manipulated, cajoled, and lied to during the entire process. The fact that demolition, which was promised would never happen if tenants went along with the City's plan, is now the City's goal shows how corrupt and audaciously greedy real estate and government interests have become. This overreach will not be forgotten but serve as a reminder to every community in the city of why this rotten alliance will be undone. (Anderson_408)

I am writing to strongly oppose the proposed demolition of the Fulton and Elliott-Chelsea NYCHA developments as outlined in the Draft Environmental Impact Statement (DEIS). At a time when affordable housing is scarce in NYC, I am shocked to learn of this socially irresponsible demolition. I don't doubt that the elevation of this neighborhood resulting from the new Whitney Museum and the High Line are major factors driving this course of action. (Davidow_098)

The demolition of Elliott-Chelsea and Fulton Houses is an immediate existential threat to those folks who live there, but make no mistake, it's an attack on all of us. We must join the residents on the front lines of defense against an encroaching corporatocracy that is destroying us. The dismantling of public housing will only serve the developer's interests and further strip us of our humanity. Protecting public housing is protecting our humanity. Stand with us to demand a 'no demolition' policy, immediate repairs, and use of the 5,000 warehoused

apartments, to salvage a little piece of humanity and be the catalyst for good things to come. (Mudd_430)

This proposed project of demolition of 22 buildings is massive, and it's brutal. I support renovation of the buildings, and I don't want to see any demolition. I like the way this campus is as it is now. (Buchanan_070)

I have heard this developer say, and NYCHA say, the only way that these buildings can be fixed is to demolish them. These buildings are the same as every NYCHA campus across the city. In fact, some NYCHA campuses are older, and they are currently today, NYCHA is renovating buildings across the city. Why is the plan not proposed for renovation here? (Restuccia_071)

The second is, which members of the public is this Fulton Chelsea Elliott demolition and proposed redevelopment serving, if any? If it's the existing residence, and how do we ensure, again, that their housing is built and they can come back? And if it's the broader community, can one of my representatives who wholeheartedly supports this articulate how this is the best use of taxpayer dollars and a return on investment as opposed to renovation. I've heard from people time and time again that renovation is markedly less expensive, and as we can see here, it's what the residents seem to want. (Moore_073)

On a personal note, I have spoken with so many who are going to be directly affected. The loss of homes for our neighbors, the pollution both sound and otherwise, little transparency, the increase in cost of daily living, traffic and density, our neighborhood is in the middle of chaos. Respectfully, please rethink this proposal, and instead of demolition of our public housing buildings and replacing with luxury towers, choose the Rehabilitation, as it is the right thing to do for our community. (Dreussi_220)

I urge HPD and NYCHA to reject the current proposal, make rehabilitation the preferred alternative, and return to the community with a plan that prioritizes the health, stability, and dignity of public housing residents. I am so disappointed in NYCHA's lack of transparency and integrity in this process. Yet another government agency that fails the people in favor of the needs of corrupt corporations. (Ginsberg_418)

Response G.46:

Comments noted.

Comment G.47:

I am in a wheelchair with a live-in home attend which does not have due to medical supply that is in my living room because I only have one bedroom and I am waiting for two bedroom transfer and with this happen I won't be able my transfer. I live on the 13 floor and sometimes elevator are not of services and twice I have got stuck on the elevator and the firemen remove me and leave my wheelchair and I can't get it until [not legible] comes. Other times I have problem get on the elevator because there is too much people so if there is 40 floor how is that going to help me. I agree the build needs repairs and need to rebuilt but not the way you guy are doing you are not considering the people that live in NYCHA you are consider your pockets because you make more apartment more market value than low

income. I go to Hudson Guild for therapy and if you knock door the clinic I won't have my therapist that I have been working with many years. (Miranda_004)

NYCHA has failed the residents of Fulton/Elliott-Chelsea Houses. Instead of rectifying their plight and trying to find a simpler solution to remedy the years of neglect, we are now talking about sacrificing our precious public housing.!! This mega (MAGA) real estate developer's plan will demolish and eliminate much of it and rezone the neighborhood- a true bait and switch scheme. Isn't Hudson Yards quite enough for Chelsea? Must we hand over our public housing to Steven Ross and Related Companies and let Hudson Yards-sized luxury housing take overall of Chelsea??? (Oddo_009)

NYCHA has failed the residents of Fulton/Elliott-Chelsea Houses. Instead of rectifying their plight and trying to find a more simple solution to remedy the years of neglect, we are now talking about sacrificing our precious public housing.!! This mega (MAGA) real estate developer's plan will demolish and eliminate our much of it and rezone the neighborhood- a true bait and switch scheme. Isn't Hudson Yards quite enough for Chelsea? Must we hand over our public housing to Steven Ross and Related Companies and let Hudson Yards-sized luxury housing take over all of Chelsea??? (Citarella_010)

Related has back traced on their promises more than once. No doubt the plans will change again and again in the future. They had promised a three-year wait for a new building; this has changed to 6 or 8 promptly after tenants were enticed into voting yes by a slim margin. They promised to pay for interim repairs—that has been abandoned. Why should we, with miniscule resources compared with theirs, trust anything else they promise? (Lee_015)

The tenants have since elected a Tenant Association president who will fight the conversion. You don't have the support of the public housing residents. (Lee_015)

New York has the mother of all oligarchies. It's called REBNY, the Real Estate Board of New York. So, if there's going to be a battle to save democracy, there has to be a battle with all of the Elon Musk, all those people, and with REBNY. Out of REBNY came the leader of the fascist movement in America. His name is Donald Trump. He is lock, stock, and barrel from REBNY. He was supported by reliance Steven Roth with billions of dollars in fundraisers out in the Hamptons. Also, the head of Vornado, Steven Roth was on the election committee in 2016 for Donald Trump. He is Donald Trump's partner and has been for 20 years. These are the people who want to destroy our neighborhoods. (Kremen_020)

And I'm looking at a 39 story high rise. I looked at that number and I went, wow, that's like just moving, you know Hudson Yards down a few blocks and we all know what that means. And, you know, I'm trying to stop someone purchasing the building that all these artists it's changed. It is a building that represents West Chelsea Art and Gallery District. It was started by Raymond and Gloria Naphtali that made it an art building and helped the whole neighborhood anywhere across the street. But I'm here just to speak, we should think about what progress is and what it means, and maybe put a pause on these grand ideas that sounds so great, but in reality, in the end, they may not be that. (Mycklebust_026, Mycklebust_053)

As New York as NYCHA knows because those tenants have opposed [demolition], their opposition is so clear, so crystal clear. And it's notwithstanding, this opposition comes in the face of years of neglect and failure by the housing authority to do what they should be doing and what they should have done for decades. What tenants here have talked about in terms of the awful conditions is disgraceful. It is disgraceful. And the housing authority is responsible for that. That there are and the reason, one of the reasons, one of the main reasons has to deal with white supremacy and the fact of who the people are. It's brown people. It's working class people. It's poor people in those tenants. And that's why there's been neglect for 20, 30 years. And it's important that NYCHA and our elected officials, they have agreed to sacrifice a long held public asset; the buildings, the grounds, they've basically 22 buildings. They're ready to essentially push all of the tenants into a six high rise segregated location. And these high rises, this is the kind of high rise that were they were knocked down; the Cabrini Green Housing Authority. They were knocked down in Chicago as uninhabitable. (Polletta_031)

I grew up in New York City. I don't recognize it. What happened to our poor working class community? We've been pushed out. We then were pushed out over the bridge to the Williamsburg, then we were pushed out of Williamsburg. We were pushed out on the Lower East Side by the gentrification. And now we're in the Bronx. You can't keep on doing this to us. We're not going to take it anymore. We will not take it anymore. You know, unfortunately, the history of this country is a history of displacement. First, the Native American and then they displace Africans in order to have cheap labor, we can no longer do this anymore. So, I you know, this playbook is old. You guys should be ashamed of yourselves. (Delgado_033)

Where are our elected officials tonight? Is there anyone in this room who is a representative of our elected officials? You are with Liz Krueger? You are with Tony Simone. Where is Tony tonight? I put it to you that these guys who we put in office, four of them, those four are afraid. They are afraid of us, and that's why they're not here. They are and this is this is really, really sad because they're supposed to be on our side. Okay? And they should be standing up for us (Wolff_034)

I want to write to ask that we re-consider the plan to demolish the homes of so many Chelsea residents. It sounds like it will be many years before they could move back in and even that doesn't sound guaranteed. The housing projects are a vital part of the neighborhood and can be repaired. Let's allow for a full discussion of alternatives before taking on a project that will lead to so much destruction and heartache. (Federman_349)

This is a land grab by a developer that has a very negative reputation in the industry. (Gross_409)

NYCHA is clearly banking on the rezoning alternative, which our city council member Eric Bottcher supports. It would need city council approval under ULURP. The council membership will predictably follow Eric's lead. He could kill the rezonings alternative by announcing today that he won't support it during

ULURP. Instead, he's green lighting it, defying his constituents who, as these hearings clearly show overwhelmingly opposed demolition. Everyone should call or write him and remind him that he's supposed to work for us. (Holowka_429)

And why are the elected officials not guarding against this looting of our tax dollars, where do they not understand that over 950 tenants have signed petitions stating unequivocally that they do not want their homes demolished. Their opposition in face of years of neglect and failure by NYCHA to do the right thing and to and to manage their houses should tell us something about this plan of demolition. (Polletta_468)

There's no accountability for anything in this plan. It's a disgrace. It really is; thank you. It really is horrible, it must be accountable, it must be thoroughly investigated. I wonder know whose coffers were filled with the money from Related. Because I think it's a disgrace, it is a land grab. It's horrible what's happening to the working poor in this country in this city and in this country. It's being a city for the rich only, and we are the people that built it. (Keghlian_065)

Why is this same developer, Related, currently attempting to renegotiate phase two of Hudson Yards? Phase two is the component that has the affordable housing and a planned public school written into the contract. And yet this is despite disapproval from the local community board. So why is this happening? It's a separate question, but it is the same developer. (Moore_073)

Second, just as the disinvestment in NYCHA is a civil rights issue, a racist issue, the demolition and privatization of public housing is also an environmental justice civil rights issue. And under the socioeconomic conditions and environmental justice part of the NEPA process, they need to investigate the corruption of the developers that have already, they already have a track record. (Cahill_074)

In the footprint of this project are children in family daycare, nursery and elementary schools -- including a rare accessible building with specialized programs for students with disabilities where 15 school buses park daily; and retirees attending senior center programs including meals. On 25th St is a busy NYC recreation center; on 26th is Hudson Guild. Each has youth programming in summer and after school hours. Across Ninth Avenue are often lines of people going to food pantries and soup kitchens; and the Naturally Occurring Retirement Community of Penn South which includes many residents with mobility limitations. Across Tenth, there is a boosted tourism/gallery industry brought to the zone by the High Line -- whose views would also be blocked by this overdevelopment. Within and beyond the boundaries are an array of small businesses whose deliveries and normal functioning are at risk. (Catalinotto_376)

Response G.47:

Comments noted.

Comment G.48:

There are unfinished projects all over this community board, namely the 15 years that the Bagman closed up on 34th Street and 8th Avenue. That lot is still under construction. We do not complete projects. Can you tell me that this project is going to be completed in 2041? I don't think so. I don't think so. That money is going to be out the window. And our population is supposedly growing if we have

children. I mean, I'm older now, but there are there are a growing population here. We need to have space, but we don't need to have tall, high rise luxury buildings. We need to have finish up the projects that we started (Rosenfeld_028)

The DEIS further asserts that renovation would take longer than the proposed phased demolition and new construction, a timeline projected to span over a decade, potentially two or three. This timeline has been subject to repeated revisions, with NYCHA representatives now publicly stating that time is not a critical factor in determining the optimal path forward for improving residents' quality of life (Lunke_076)

Project will take 7 years. No elaboration. 7 years for entire FEC campus(s) ? or 7 years per campus ? simultaneous ? or one after the other? (Shanley_345)

I'd just like to know exactly when is this going to start because I am handicapped and I would like to know, you know, everything that's going to go on with the timing that I need. (Sims_474)

Also, I'm interested to know, and I don't know if this is posted anywhere, what the timeline is? Previous speaker had mentioned they wanted to know when this was all going to start, when the if the proposal goes through, and who gives the ultimate say on this going through? (Adams_255)

If demolition is our only option I believe we should be better informed on air quality, timeline, and guarantee placement on property while waiting for new buildings. I feel as residents we have not heard information regarding fixing the NYCHA complex instead of tearing it down. What would be our timeline if we keep the buildings and have related fix existing problems? (Lopez_289)

Response G.48: EIS **Chapter 05.19, “Construction”** outlines and describes the anticipated construction timeline for each feasible alternative.

Comment G.49: Now let's talk about what they want to do. They want to talk about affordable. I looked up the AMI because to tell you the truth, I didn't know what they were talking about. AMI in these projects would be 80 percent. 80 percent. A single person, 80 percent is \$86,960. Let's talk about a couple who's getting \$3,500 each in social security. That's \$7,000 a month. In a year, it's 84,000. That's under the 86,000. They wouldn't qualify to live in these quote affordable apartments. (Gelb_363)

Now what happens if they build they're going to build 3,454 new units? 30 percent AMI 30 percent of that is going to be affordable. So let's talk about what that means. 80 percent of AMI is 86,960. Oh, I looked up; a starting teacher in New York City makes \$66,733. With a bachelor's degree, 75,000, a starting teacher won't be able to afford to live here. So who are they building it for, Jerry? Who are they building it for, Tony? Who are they building it for, Eric? Who are they building it for, Brad? (Gelb_363)

The plan claims to provide “affordable” housing, referring to 80-130% AMI. However, the lowest AMI for a single person is \$90,720, while a starting teacher's

salary in New York City is \$66,700. This discrepancy raises the question: Is this housing truly affordable? (Gelb_363)

The last item I'd like to address is the term affordable. There are going to be 1,038 "affordable apartments." What is affordable? For one person affordable is a blended AMI between 80 and 130 percent. That is one person making between \$90,720 annually up to 147,420. So is that affordable? A New York school teachers start at \$66,720. That school teacher would not be acceptable, would not qualify for this development. A retired couple earning \$7,000 a month would earn would make 84,000. They would not qualify for this development. I saw a sign in the subway the other day that listed jobs for servers, cleaners, cashiers, bartenders, and even chefs. It ranged from 38,500 to \$70,000. None of them would qualify to live in this development. So when we talk about the word 'affordable,' who is it affordable for? How about artists, actresses, actors? How about musicians? Who can afford? Who starts with a salary of 90,720 as the base? This is not affordable. And if this is what they call affordable, what will the luxury housing cost be? Who will that luxury housing be for? For the rich. So you're going to destroy our community to let rich people move in. Thank you. (Gelb_363)

So now cutting this short, last but not least, the buildings at market the apartments at market rate value. Does Chelsea need such luxury housing? (Shanley_048)

Rather than funneling support into more market-rate housing that does not serve the majority of our city's residents, we urge HPD and other city agencies to reinvest in existing public housing, expand Section 9 subsidies, and support community-driven development that keeps people housed—not priced out (Cruz_093)

New York City is the densest city in the country. Housing policies here should be aimed at maintaining and improving existing affordable units, not at increasing luxury residences. I urge HPD and NYCHA to reject the current proposal, make rehabilitation the preferred alternative, and return to the community with a plan that prioritizes the health, stability, and dignity of public housing residents. (Freud_334)

then issue of building 39 story towers. Chelsea is low rise. Has anyone asked residents of Chelsea do they want 39 story buildings ? & it is my understanding that these buildings will be market rate. Does Chelsea need more & more market rate housing ? A # of market rate housing has been recently built in Chelsea. Need more ? (Shanley_345)

Have not heard answer to question- when will affordable housing become market value -20 years ? 30 years ? (Shanley_345)

As for affordable housing I am appalled that there is not more apartments for low income, people with disabilities, middle income and affordable housing. NYC considers \$90,000 affordable. Teachers, nurses do not make that kind of money so they are excluded. What about minimum wage workers? They too cannot afford to live in your buildings. So I think it is a land grab and I am very disappointed that this is just an extension of the Hudson Yards. (Jendrzewski_360)

From what the public has been told, NYCHA gives up the land, Related gets to build mixed use housing with no specifics as to what the details will be on affordability. They will profit from the rents of those mixed use units. NYCHA, and ultimately the public, will lose out through a privatization of the entire campuses of the of both Fulton and Elliott Chelsea because NYCHA has agreed to go to the end of the line when sharing profits from the mixed use housing to be built. And it will also be left holding the bag if Related decides to walk away at any time during the construction phase. (Polletta_468)

Response G.49:

The Preferred Alternative and Midblock Bulk Alternative would require zoning map amendments and therefore, consistent with City policy, would also include a zoning text amendment designating the rezoning area as MIH areas. Under MIH, including amendments adopted under the COY application approved by the City Council in December 2024, all of the options applicable to the Project Sites require affordable housing for households at lower average Area Median Income (AMI) to those indicated in the comment. These include MIH Options 1 (weighted average of 60 percent AMI), 2 (weighted average of 80 percent AMI), and 3 (weighted average of 40 percent AMI). Although the Non-Rezoning Alternative and City of Yes Alternative would not require the designation of the Project Sites as MIH areas, the Proposed Project includes a commitment to provide affordable housing units under requirements comparable to MIH.

As discussed in EIS **Chapter 01.0, “Purpose and Need for the Proposed Project,”** one of the purposes of the construction of market rate housing units is to financially support the PACT portion and new affordable housing component of the project.

Comment G.50:

The other thing is, a lot of the residents legitimately bring up security. They feel insecure. People have come into their houses. There's been violence there. People without homes in coming into their development. And the thing is Related and Essence now run their security. So what makes them think they're going to be any more secure with this new development if they can't even get the security they want? Related when we were at a press conference last week, I was directing people to the press conference. Related security was taking my picture. I'm a 62 year old man, forget me. Go after the people who intrudes into your building and protect the NYCHA tenants. Not take my picture because of I'm opposing your development. Once again, this would be a monstrosity for the community. We really need to not have this happen. And thank you for your time. (Warren_154)

Response G.50:

The information discussed in this comment is outside the scope of the EIS.

Comment G.51:

Also, everyone's talking about affordable housing but it's also affordable living; the expense of going to school, the expense of getting groceries, the expense of basically everything, getting around in that area. Will people be using Ubers? Will there be additional transportation? (Robinson_055)

Response G.51:

The pricing of goods and services is outside the scope of the EIS. Nevertheless, it should be noted that the Project Sites would continue to be served by public transportation and by public schools. EIS **Chapter 05.19, “Transportation”**

provides analysis regarding transportation impacts as a result of the Proposed Project.

Comment G.52: I've also not heard anything about saying, in terms of mitigating the rats. If you go to 19th and Tenth Avenue or Ninth Avenue Ninth Avenue, there are plenty of rats that you can that are visible at any hour of the day. (Robinson_472)

Response G.52: See response to comment 19.7.

Comment G.53: I've also heard nothing about the rats. And one of the concerns that a lot of people have in the area is that there's tons of rats that will then leave this complex over the course of 30 years. I don't think it's 15 years, I think it's 30 years. (Robinson_018)

Rodent infestation does not seem to be a line item on the environmental impact statement yet their existence is beyond problematic. (Robinson_082)

Response G.53: See response to comment 19.7.

Comment G.54: And I just want to but I want to make it clear that these in terms of the supermarkets, when they say 17,000 square feet, if that's split into two, where there's, you know, the 17,000 square feet, is that 8,000 square feet on the ground level and another 7,000, 8,000, whatever you want to call it, in the basement? There's no clear understanding of what that retail means. (Robinson_055)

Response G.54: EIS Chapter 02.0, “Project Alternatives” presents the development program and site plans for each of the alternatives studied in the EIS. For the Preferred Alternative, there would be approximately 17,580 gsf of supermarket space, split between 11,000 gsf on the Elliott-Chelsea Project Site and 6,800 gsf on the Fulton Houses Project Sites. The site plans identify the location of the pedestrian entrance on the ground floors; the exact floor plans within the buildings is outside the scope of the EIS.

Comment G.55: I'd just like to ask, first of all, that the Community Education Council be kept in the loop about the plan because so far we have not received a single bit of direct communication about it. We've only heard about it indirectly, which I think is a shame. I'd also ask for regular updates to the PS 33 community, which will be directly impacted by any project including on mitigation efforts for dust, construction, noise, and the shading of school grounds. (Healy_049)

Response G.55: Comment noted.

Comment G.56: My comment basically is concerning people who don't actually live in the development. I'm so sorry that our build possible project may encroach on your views. I apologize that it may encroach on the, you know, on the on the park spaces and inconvenience a lot of you. But how much is that worth a person's life? Because we have lost lives here. Our lives are in jeopardy almost every day. There was a shooting just the other day underneath my window on 19th Street. That's happened regularly. We've had people assaulted, shot, stabbed, sexually assaulted as well, unfortunately. The buildings leaks still constantly. There are some that

basically contend that, oh, there's nothing wrong with these apartment or buildings. They are old, they're decrepit. We need a new development, not patchwork on some old buildings, piping and electricity and everything else. Can you jerry rig these buildings? Yes, you can jerry rig everything, but is it going to last? That is the question you have to ask. Okay. And yes, the price is astronomical. I agree a 100 percent, but look at the other developments that are being developed like Penn Station and some of the other ones in the area. How much are those? A couple of billion. The casino over there that possibly will be opening up in Penn Station area. So I'm kind of at a loss that there are a lot of people here that have a lot to say now, but where were you all the past couple of years when all this stuff is still happening. (Vasquez_019)

I strongly support the plans for Fulton and Elliott-Chelsea housing developments, which include demolishing functionally obsolete buildings and building new, code-compliant, and clean housing so that everyone can live in dignity. (Golab_151)

We strongly support the demolition of these projects urgently and we want a safe and vibrant community to live in. We are overwhelming calling on NEPA to move forward with the demolition of Fulton Houses. (Campbell_332)

It's our opportunity to shape the future together. I strongly support demolishing these outdated, unsafe buildings and replacing them with brand new modern homes. Not temporary fixes, not patchwork repairs, but solid buildings built to last for generations. (Vasquez_019)

I'm in support of the rebuild. I think we need better housing, you know, better community resources. And it's opportunity for us to be safe with our kids and with our family. (Alexander_438)

My name is James Williams, and I just want to say that I am in support of the rebuild mainly because we need upgrades to our housing. And like, really overall, I just want like, safer places for, you know, me, the residents of this building, the children, everything. But yeah, that's really my take on it. (Williams_482)

I am a tenant of Fulton Houses since November, 1996. Since my time living here; I've had bad experiences in regards of how bad the building has become. There's a lot of rodents, door broken, elevators shut down and heat and hot water shut downs and non-residents entering the building that doesn't belong here. It's not safe! The stairways they're always a lot of drugs and dangerous needles, and human feces being left in the stairways. This building has been deemed not safe by my fellow neighbors. There's a lot of tenants that are elderly and in wheelchairs and disabled individuals that are being affected on a daily basis. Despite all of these issues, I remained a loyal tenant of Public Housing and it's affordability that helps my fellow New Yorkers get and find a place to live. Due to these concerns and the intending demolition of these Projects are in fact "Very Good" for our community. It will definitely enhance our living environment and make us the tenants feel safe and will indeed bring relief to many. I wholeheartedly support this initiative and for the vast improvement of this Chelsea neighborhood. In conclusion, I would appreciate that this letter of support for the demolition of Fulton Houses be file in

accordance with those that are in favor of the rebuilding of NYCHA Fulton Houses. (Campbell_079)

I'm writing as a resident who lives directly across the street from the Chelsea Houses to express my full support for the proposed demolition and redevelopment of the site. While I understand that many current residents may feel anxious about this change, I truly hope they are provided with appropriate housing accommodations during the construction period and are fully supported throughout the process. Their needs and dignity must remain a top priority. That said, I firmly believe this project will ultimately be better for everyone—residents, neighbors, and the broader community. The existing buildings are outdated and no longer serve the standards that New Yorkers deserve. A full rebuild represents a chance to create safer, more modern, and more livable homes for current and future families, while also revitalizing the surrounding area. As a close neighbor, I welcome this long-overdue investment and believe it will bring lasting, positive impact to our neighborhood. (Gross_147)

I'm in support of the redevelopment project for the Fulton and Elliott Chelsea because we desperately need new homes. This is all about quality of life. We deserve the same quality as everyone in this city. (O'Connell_462)

Response G.56: Comments noted.

Comment G.57: You cannot complain and say, we need demolition because of the crime or because of the, you know, the and they talk about the boiler, they talk about the repairs. It could be repaired; it could be repaired with Section Nine. It has it has repaired for many years. I know. And if we'll turn over to the market rate, we're going to be homeless within time because the contract with Essence Related is only 20 years. And after 20 years, I might not be alive. But the people that have low income will be homeless, because they're saying that they're giving us affordable rent. It's not really affordable. (Cruz_442)

Response G.57: Comment noted.

Comment G.58: I live in a unit with two bedrooms, separated from the living room and the kitchen by a long hallway. Has two exposures, south and west that helps keep the apartment cool in the summer. This luxury will not be available in the new construction where the air will be stuffy. I support housing development, Chelsea needs more housing, but knocking down 21 story buildings doesn't alleviate the shortage. I don't want to rely on the ever changing promises of a politically powerful real estate developer. (Lee_063)

I've seen new construction. Their units are always smaller unless you pay an arm and a leg, and sometimes more than that. We are being moved from larger units to smaller units. If the city insists on displacing its residents, then please issue more some bonds and hire a developer to build new units. Then collect the market rents yourself, and collect the Section 8 vouchers yourself. (Lee_063)

Response G.58: Comments noted.

Comment G.59: My grandson is in a wonderful Penn South Garden. What will happen to that? (Hunte_064)

Response G.59: Penn South is outside of the Project Sites and not part of the Proposed Project.

Comment G.60: I just wanted to let everybody know that Fight for NYCHA was six tenants in Fulton and Elliot Chelsea Section 9 and Section 8. We filed a lawsuit in state court two weeks ago. The lawsuit asserts that such a massive development on this scale radically gentrifying the neighborhood, which will displace seniors and low income people of color, must go through ULURP, and we believe the law is on our side. We do not believe the elected officials are on the side of the tenants. Hello. Our tenants are being ignored by all the West side politicians, which is why it's important to make them uncomfortable and push multiple legal strategies. We have one strategy, but we are looking for multiple legal strategies and other tenants to, you know, kind of take that bait. It's very important so you guys need to find lawyers. (Halasa_027)

But anyways, I wanted to tell everyone here that Fight for NYCHA with six tenants from Fulton and Elliott Chelsea, section eight and Section 9, we filed a lawsuit in State court two weeks ago, and the lawsuit asserts that such a massive development radically gentrifying the neighborhood, which will displace seniors and low income people of color must go through ULURP. (Halasa_075)

Response G.60: Comments noted.

Comment G.61: Regarding facades, the Department of Buildings website lists active violations on 16 of the 18 Fulton and Elliott Chelsea apartment buildings for failing to file facade inspections. Some are now deemed unsafe by DOB. Most of the violations are already over three years old. Why isn't NYCHA having these buildings inspected and repaired as required by law? Is it allowing them to deteriorate to build a case that they're beyond salvage? That's a practice of unscrupulous developers called demolition by neglect. (Holowka_429)

Nearly four years since Related and Essence were selected to bring full renovations to all FEC apartments, no meaningful repairs have been made. NYCHA as landlord is obligated by law to provide safe and habitable houses to residents of FEC. The parties produced the "Meanwhile Plan", perhaps a casual reference to the period, estimated to be over 10 years from when the Chelsea Working Group first met to plan how to achieve needed repairs for FEC residents and when they are expected to be residing in safe, habitable homes. The "Meanwhile Plan" has now been renamed the "Bridge Plan" and requires pest control, security, and painting - things that NYCHA is already obligated by law to provide. This plan inadequately addresses most conditions residents are enduring. The DEIS does not mention what, if anything, the PACT Partner or NYCHA would do over the next 38 months (about 3 years) to remedy the myriad other serious conditions that residents currently face, including leaking roofs, mold, defective plumbing, crumbling facades, elevator outages, inadequate heat, and lead paint. (Newman et al_260)

NYCHA has said moving residents into right sized apartments in new buildings will result in the loss of about 260 bedrooms, a permanent reduction in public in housing capacity for future generations, perversely aided by low income housing tax credits. The DEIS doesn't even mention this loss. We only know about it because of NYCHA's written answer to a direct question from CB4. Why doesn't the DEIS list it as an adverse impact of all of the demolition based alternatives? Could it be because the DEIS is just more of the self serving nonsense NYCHA has been expecting the public to believe all along? (Holowka_429)

Response G.61: See response to comments 11 and G.5.

Comment G.62: Have the NYCHA residents been told of all aspects of demolition and then reconstruction? None that I've heard of. I hear bits and pieces, bits and pieces. And has there been a vote taken of NYCHA residents? No, none has been done. There's been a survey and a petition, but no vote. And the voting, as far as I'm concerned, should be one vote per apartment by the shareholder of the apartment, or the head of household of the apartment, and it has to be a certain percentage. It cannot be 2 percent. But this has not been looked into at all. (Shanley_048)

All of this engagement is not consistent from the tenants to demolish. Neither is the consultation you have with federal, state, and city agencies. Where are the meeting minutes and what type of consultation was had? This DEIS is too vague. The information that is needed is nowhere to be seen. Where's the obsolescence report? Where's the independent course analysis? No action (unintelligible) the solution. We need rehab of our buildings. (Miranda_061)

The mere holding of information sessions by NYCHA and its demolition and redevelopment partners regarding their objectives for the FEC campuses does not constitute meaningful public engagement. The proposed project demonstrably fails to incorporate community feedback and suggestions, nor have pertinent questions regarding the project's necessity been answered in a transparent and forthright manner (Lunke_076)

We are witnessing: Systemic discrimination against low-income individuals who are not being counted or considered in redevelopment plans. We call on HPD to: Include residents in decision-making, not just developers with money and influence. (Cruz_087)

Intentional neglect of NYCHA residents while billions in funds go unaccounted for. 2. Increase oversight and accountability in all NYCHA and Section 9 operations. (Cruz_087)

Meanwhile, NYCHA developments—once a critical support for working-class and low-income New Yorkers—are being left in disrepair. Billions of dollars have been promised, but very little has translated into real, lasting improvements for the residents who depend on these homes. We demand transparency and accountability for where this funding has gone. (Cruz_093)

Hearings suggest that the public is not being listened to and this project is being rushed through. (Connolly_211)

While the DEIS references community meetings and outreach, the process has been opaque and top-down. Many residents report being uninformed or confused about the implications of the project, and critical questions from community stakeholders—including elected officials—remain unanswered. The decision to move forward with a public-private partnership without a resident referendum or a binding vote from the tenant population fundamentally undermines the principles of participatory planning. (Brahmbhatt_416)

Why are every one of our elected officials completely capitulated and agreed to this disaster? It's widely seen by the public as a giveaway and alluding of our public asset that is home to a thriving community of elderly, disabled, and working class people in the middle of Chelsea. After winning a bid to renovate the campuses, Related and Essence did a 180 degree turn around and claim that demolition was the only feasible alternative. Really? Did they provide details? None of the reasons for their 180 degree turnaround have ever been made public. Have our elected officials ever pressed for an explanation? Not that anyone knows. The underlining financing details are also a mystery. (Polletta_468)

And just so people know, there was a Chelsea working group that was convened by Mayor De Blasio in 2019. And that working group is actually a contract. And that contract stated that there was not going to be demolition and that the developer that was going to come in, was actually going to fix those apartments. And that seems to be totally ignored. (Halasa_447)

First, it does not adequately address community input. In fact, there are serious reports of community harassment and intimidation and people who are being told that they must leave. The NEPA hallmarks are transparency, informed decision making, and accountability. These all must be investigated as part of the NEPA process in the EIS. (Cahill_074)

So much testimony has already shared not knowing. And as a Penn South community member, we have not been notified at all. Also, community members have not been notified in clear language, multiple languages about also the critical impact of air quality, noise, demolition on and construction for the next 20 years. So not only that this is happening, but what is actually happening and the impact. So this whole process is being pushed through too quickly. (Cahill_074)

Most of our Penn South neighbors, and particularly those who are elder, had no idea this was happening. My understanding of the NEPA process is that the “Responsible Official must use appropriate communication procedures to ensure meaningful public participation throughout the NEPA process. The Responsible Official must make reasonable efforts to involve the potentially affected communities where the proposed action is expected to have environmental impacts or where the proposed action may have human health or environmental effects in any communities, including minority communities, low-income communities, or federally recognized Indian tribal communities.” This has not been the case. (Cahill_271)

NYCHA and the PACT partners also failed in their duty, during the lengthy planning process, to address directly the schools that will be impacted by this

project, until the actual DEIS was released. How can this be appropriate notification? The children at these schools, particularly PS33 and The Avenues School, will have their learning and play environments compromised by noise and shadows to an extent that is completely avoidable (see Alternative 5) and is unacceptable by every standard. The need for comprehensive mitigation for the schools in terms of noise, shadows and particulate matter from all activities on the site is not sufficiently addressed in the DEIS. Both the failure to notify, and the insufficient mitigation strategies, are clearly by design, and it is a significant and, again, shameful failing of this document and the entire process. Please provide us with evidence that this process actively attempted to engage the greater Chelsea Community and the affected schools and their Parent Associations prior to the publication of the DEIS, including copies of signage, brochures, emails and scheduled meetings for these populations, etc. None of those meetings listed in your chart involved any outreach to these stakeholders in terms of the potential impacts. There are many ways to engage with the broader community, including CCBA (The Council of Chelsea Block Associations), Individual Block Associations, Advocacy Groups for the Historic District, like Save Chelsea, resident's association in the major buildings like Penn South and London Terrace, and Parent Associations and Teachers representatives at the schools. As far as I can tell, all of these stakeholders were intentionally left out of the process. How did this occur? (Andre_056)

The specter of a mayoral override of local land use regulations casts a pall over the proceedings, highlighting a palpable disregard for decades of public engagement in decisions concerning publicly owned land. The very genesis of the Uniform Land Use Review Procedure (ULURP) and the City Environmental Quality Review (CEQR) arose from the hard-won lessons of the largescale "urban renewal" era, a period of widespread disruption and broken promises. These processes were instituted to provide communities with a voice, enabling them to alert elected officials to analytical deficiencies in proposed projects and safeguard neighborhoods from destructive schemes. To ignore this historical context is to court a repetition of past errors. (Lunke_076)

Response G.62: See **EIS Chapter 03.0, "Process, Coordination, and Public Participation,"** for a description of the public engagement process that led to the Proposed Project. Also see response to comment 4.

Comment G.63: I am concerned about the proposed transition to a federally funded program called Project-Based Section 8. Under the current administration DOGE cuts to HUD make future funding uncertain. I do not see this large scale demolition of affordable housing ending well for low-income residents. The funding is based on uncertain money and I believe is profit driven. (Hodorowski_240)

The Trump administration has begun closing the Section 8 program. While I agree that it is a poor use of taxpayer money—it increases housing demand while doing nothing for the supply—the fact that PACT conversion relies on Section 8 funding should make you go back to the drawing board. Please come up with a more

equitable plan. If you have the money for Section 8, you have the money for Section 9. (Lee_015)

The future availability of federal Section 8 vouchers remains uncertain, rendering them no more secure than Section 9 funding. (Lunke_076)

Councilmember Erik Bottcher, Assemblymember Tony Simone, and State Senator Brad Hoylman-Sigal have told us it is “safe” to end Section 9 public housing, because tenants will be given Section 8 vouchers. Section 8 does not afford the same protections as Section 9. Donald Trump wants to cut Section 8. What would happen to our NYCHA residents then? We cannot abandon our NYCHA residents!” (Bosco_158, Cohen_183, Frame_156, Gutierrez-Solana_120, Kaufman_316, Lee_309, McManus_299, Mitchell_195, Russell_139, Spinner_319, Weinstein_128, Wishingrad_149)

NYCHA consistently states that their waiting list for apartments are in the hundreds of thousands and there is low turnover of existing apartments. Certainly Section 8 is in jeopardy for the next several years. (Kover_125)

I am in agreement with the large number of tenants and community members who support rehabilitation and infill alternatives, not the full-scale demolition of people's homes. This route is environmentally irresponsible, socially destructive and (particularly given the vulnerability of Section 8 funding, on which the PACT plan to fund replacement units rests) extremely risky. There is no reason for the city to take the path that it is taking, except for the impulse to provide valuable land and development rights to a developer who did not even go through a competitive bidding process...This plan prioritizes market rate development on public land and does not ask nearly enough of the private developer involved. It also unnecessarily (if temporarily) displaces thousands of NYCHA tenants who might never be able to return to the new homes promised them. (Wolf-Powers_263)

Finally, the Section 8 program is under review by the federal government and may be canceled. How will we be able to afford the new rents without the vouchers? Thank you. (Lee_063)

The first is, I want to understand with this proposed demolition, what are the safeguards in place in the event of extenuating circumstances or default during this demolition by related to ensure that we have future Section 8 housing and affordable apartments ultimately actually built here.

The complete and total financial cap on this demolition to related is \$10 million. This is a \$1.9 billion deal. That \$10 million is less than one percent of this entire deal value, it's half of a percent. In the event of anything not going out according to Related laid out plans, this is their total, total incentive. Are we going to be able to ensure that the residents who are coming back for future Section 8 housing, and additionally, again, any affordable apartments are actually built? How do we ensure that? (Moore_073)

On May 2, 2025, the Trump Administration released its proposed budget, which would slash \$26.72 billion from HUD's rental assistance programs, representing a

43% cut to HUD rental assistance – including Housing Choice Vouchers (HCVs), Public Housing, Project-Based Rental Assistance (PBRA), Section 202 Housing for the Elderly, and Section 811 Housing for Persons with Disabilities – by combining them and block granting them into one program, State Rental Assistance Block Grants. The proposal would also impose a two-year time limit on receiving rental assistance for “able-bodied adults.” These proposals put the future of the Section 8 program into great jeopardy. It would be reckless to demolish the homes of FEC residents for a project that hinges on the issuance of thousands of PBVs at a time when the President is aggressively moving to dismantle the Section 8 program. The economic fallout and uncertainty around tariffs and other Trump economic policies also make demolition risky because of the real prospect market conditions could make rebuilding homes for FEC residents financially untenable for Related and Essence. (Newman et al_260)

Further, residents must be informed that they have rights as tenants and as a Section 9 tenant. With this in mind, we note that not one of the alternatives evaluate staying as a Section 9 tenant as an alternative. What does this mean in the current fiscal climate when Section 8 is being threatened at the Federal level? The precarity of Section 8 must be evaluated in the EIS. (Cahill_271)

The proposal to demolish 24 public housing buildings and replace them with luxury towers is not only environmentally destructive — it is socially irresponsible and highly disruptive to lives. It actually goes beyond being “disruptive”, it's more accurate to say it will upend lives. Furthermore, the financial structure of this plan raises serious concerns. (Yong_208)

I worry that our current federal administration might decrease federal support for Section 8 vouchers. That's a very important thing to think about. This does not address the desperate need for affordable housing. That is, once again, this is a way to, to build luxury housing, what they call market- rate housing is really luxury housing. And do we need that in our neighborhood? I don't think so. (Hughes_017)

Response G.63:

Regarding Section 9 and Section 8 PBVs, see response to comment 21. Regarding possible future changes to federal policies and funding, that is outside the scope of the EIS.

Comment G.64:

And today, in a city, in a State with more wealth than ever before, we are being told that there's no public money left to fix public housing. It is a lie, but there is money. The State of New York currently has a \$6 billion surplus. That is not a typo. That is public money sitting in public office. Money that could be used to finally reinvest in the public housing that has served generations of working families, seniors, immigrants, and essential workers. So, why is it not being spent on NYCHA? Why are we being pushed into risky public private partnerships when public funding to keep our homes in public hands where they belong? (Keitt_072)

Response G.64:

The requested information is outside the scope of the EIS.