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Re: MCB4 Response to Fulton and Elliot-Chelsea Houses Redevelopment Project

On March 24, 2025, the New York City Housing Authority (NYCHA), in coordination with the New York City Department of Housing Preservation and Development (HPD), released the Draft Environmental Impact Statement (DEIS) for the proposed redevelopment of the Fulton and Elliott-Chelsea Houses. The Proposed Project, submitted under the federal National Environmental Policy Act (NEPA) and related state and city environmental review statutes, contemplates the demolition and replacement of all existing NYCHA buildings on both campuses and the construction of new mixed-income housing, community facilities, and commercial space.

Manhattan Community Board 4 (MCB4) submits this response to the Draft Environmental Impact Statement (DEIS) as part of the formal public review process established to assess the potential environmental impacts, alternatives, and mitigation strategies associated with the proposed Fulton and Elliott-Chelsea Houses Redevelopment Project. The DEIS is intended to inform agency and public decision-making, and MCB4's role in this process is to ensure that the

Final Environmental Impact Statement meaningfully incorporates community concerns, technical analysis, and public testimony.

This letter should not be interpreted as an endorsement of, or opposition to, any specific development alternative, including the proposed demolition and rezoning scenarios. MCB4 reserves its right to take a formal position on the broader project through the Uniform Land Use Review Procedure (ULURP) or other future public review processes.

While MCB4 appreciates the DEIS's acknowledgment of several key impacts, we believe the document underrepresents the full scope of potential effects in critical areas and leaves important community questions insufficiently addressed. This submission reflects the Board's comprehensive review of the DEIS and upholds the values of equity, transparency, and long-term public benefit essential to any responsible redevelopment effort.

At its regularly scheduled Full Board meeting on May 7, 2025, Manhattan Community Board 4 (MCB4) voted 37 in favor, 0 opposed, 0 abstaining, and 2 present but not eligible to vote, to adopt and submit the following formal response to the Fulton and Elliot-Chelsea Houses Redevelopment Project DEIS.

Overview of the DEIS for the Fulton and Elliott-Chelsea Houses Redevelopment Project

The Draft Environmental Impact Statement (DEIS) for the Fulton and Elliott-Chelsea Houses Redevelopment Project proposes the demolition of all existing NYCHA buildings on the two sites and their replacement with a mixed-income development that includes one-for-one unit replacement for all 2,056 NYCHA households using Section 8 Project-Based Vouchers (PBVs), alongside new affordable and market-rate housing, community facilities, retail, and public open space. The project's stated purpose is to “address deteriorating conditions on the Project Sites, preserve housing affordability, and improve the quality of life for residents” while generating sufficient private capital to fund redevelopment and long-term operations. The DEIS identifies urgent needs related to building systems, structural integrity, and environmental health hazards—needs which, according to NYCHA, cannot be addressed with current federal funding under Section 9.

In response to comments from MCB4 and other stakeholders, the DEIS includes an evaluation of six alternatives, including the Rehabilitation and Infill Alternative (Alternative 5). That alternative would renovate existing buildings and add infill construction without rezoning. However, the DEIS ultimately concludes that this approach is “financially and logistically infeasible” and that it “would not create enough market-rate housing to financially support the PACT and affordable housing components of the project,” nor would it sufficiently address the “long-term deficiencies of the existing building structures.” The DEIS also notes that under this alternative, “critical outdated building systems could not be upgraded sufficiently to meet long-term or even short-term needs” and would require more extensive resident relocations than redevelopment.

The DEIS advances the Rezoning Alternative (Alternative 2) as a preferred scenario. This alternative includes 15 new buildings ranging from 12 to 39 stories. It would result in 5,510 total dwelling units, including 2,056 Section 8 PBV units, 1,038 affordable units, and 2,416 market-

rate units. The proposal would also deliver 144,082 gross square feet of community facility space, plus new commercial uses including a supermarket, retail, daycare, and a medical office. According to the DEIS, the Rezoning Alternative “would satisfy the project purpose and need” by providing new, energy-efficient housing, minimizing temporary relocations (94% of residents would move directly into new homes), and generating sufficient private investment to cross-subsidize long-term affordability. **However, the DEIS also acknowledges unavoidable significant adverse impacts in areas such as shadows, transportation, and construction noise, which would require mitigation measures but may not be fully offset.** MCB4 believes these trade-offs warrant closer scrutiny and broader community deliberation before advancing this redevelopment plan. As part of that effort, we respectfully request 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.

MCB4’s Comments to the January 2024 Draft Scope of Work

In its March 8, 2024, letter to NYCHA, HPD, and HUD, MCB4 raised serious concerns regarding the proposed redevelopment of the Fulton and Elliott-Chelsea Houses and the Draft Scope of Work for the accompanying DEIS. In that letter, MCB4 characterized the evolution of the project as “tremendous, and troubling in its unclear evolution,” underscoring a lack of transparency and procedural integrity. MCB4 noted that the community first learned of NYCHA’s shift toward full-scale demolition “via the *New York Times*” on June 20, 2023, rather than through direct engagement. **The new proposal 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.** In its March letter, MCB4 called for “thoughtful engagement throughout” the process and described the development team’s conduct as reflecting a “blatant disregard for a reasonable public process.”

Additionally, MCB4 expressed concern about the lack of transparency surrounding resident support. While NYCHA and its partners cited a resident survey to justify demolition, MCB4 noted that “the results of that survey have yet to be released though MCB4 has been requesting that the survey be made public since August 2023.” 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.” **In addition, MCB4 raised alarms about the lack of financial transparency: despite the project’s scale and complexity, encompassing NYCHA replacement housing, affordable housing, and market-rate development on public land, no comprehensive financial plan had been released.** 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.

MCB4 also criticized the physical and social implications of the proposed redevelopment plan, warning that the project “will continue to segregate the community through the separation of NYCHA housing in buildings wholly separate from the new market rate and affordable housing.” **MCB4 asserted that this design 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. MCB4 concluded by reiterating its support for meaningful investment in NYCHA campuses and emphasized that the current plan could not progress without significant revisions to ensure transparency, community accountability, and equitable outcomes.

NYCHA and HPD’s Response to MCB4 Comments Draft Scope of Work

In response to the comments submitted by MCB4 and other stakeholders on the Draft Scope of Work (DSOW), NYCHA and HPD issued formal responses in Appendix A.1-II of the Final Scope of Work. These responses outline where the agencies agreed to revise the DEIS analysis and where significant concerns raised by the community remain unresolved. The summary below highlights key themes from MCB4’s comments, alongside representative quotations and reference points from the agency responses.

Demolition vs. Rehabilitation Alternatives

MCB4 reiterates its strong objection to the exclusion of a fully developed rehabilitation alternative that preserves existing NYCHA buildings. In prior comments, MCB4 explicitly requested the inclusion of an option that “complies with the Working Group requirement of no demolition” and reflects the original, resident-centered renovation plan developed through the Chelsea NYCHA Working Group—a multi-stakeholder body including residents, elected officials, housing experts, and NYCHA itself, which convened over 15 months to evaluate feasible pathways for reinvestment. (See Appendix A – Infill Sites from Chelsea NYCHA Working Group Report)

In response, 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. However, NYCHA’s claim that this alternative “reflects the preliminary development program identified by the Working Group and PACT Partner in its RFP response” is inaccurate and misleading. As the Working Group emphasized, “a viable path forward must include multiple, interconnected strategies,” including infill options that avoid the demolition of existing NYCHA residential buildings.

While MCB4 concurs that Alternative 5, as presented in the DEIS, is not viable, we dispute the reasons cited by NYCHA. The infill sites selected for the Fulton campus were not subject to community-endorsed due diligence and were not among those analyzed or supported by the Working Group. More critically, six vetted and financially modeled infill sites identified in the Chelsea NYCHA Working Group Report were entirely omitted from the DEIS’s evaluation of Alternative 5, thereby skewing the financial analysis and misrepresenting the viability of a rehabilitation-driven model.

The Working Group developed a highly conservative financial model in coordination with NYCHA, which projected that 696 units could be built across the remaining infill sites (excluding the 19th Street Playground site), with all new housing developed as 50% affordable and 50% market-rate. This infill strategy was estimated to generate over \$100 million in land value to NYCHA—funding that could support comprehensive rehabilitation at the Chelsea campuses. NYCHA itself reviewed and validated the financial assumptions and deemed them “extremely conservative.” Furthermore, the Working Group insisted that building envelopes must be contextual, modest in height and bulk, and aligned with surrounding neighborhood character.

By failing to analyze the complete set of Working Group-approved infill sites and instead substituting unvetted alternatives, the DEIS undermines the integrity of the environmental review process and does not meet NEPA’s requirement to evaluate a reasonable range of alternatives. This omission not only distorts financial feasibility but also dismisses a resident-led planning process that NYCHA originally convened and endorsed.

The FEIS must correct this significant analytical gap and restore fidelity to the community planning process NYCHA itself helped initiate. MCB4 therefore 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.

Rezoning and Building Massing

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. MCB4 urged the consideration of middle-income housing and a reallocation of building height away from Ninth Avenue. In response, NYCHA confirmed it would study a “Midblock Bulk Alternative that would shift height and density from Ninth Avenue to the midblock at the Fulton Houses Project Site” (Response to Comment 1.27). However, NYCHA also stated that middle-income housing would not be included, claiming it “would not generate sufficient financial returns to support the affordable housing and PACT components of the Proposed Project” (Response to Comment 1.23). 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.

Equity and Affordability Framework

MCB4 raised concerns that Mandatory Inclusionary Housing (MIH) does not adequately secure long-term affordability. MCB4 asked NYCHA to “evaluate a plan that secures permanent affordability through regulatory agreements and deed restrictions” and closes the “gaps in AMI eligibility” between income bands. NYCHA rejected this approach, stating that “the inclusion of middle-income housing in addition to the MIH (or equivalent) units would not be financially feasible” (Response to Comment 1.22). The agency maintained that MIH is the applicable affordability framework under the zoning proposal.

Environmental and Historic Preservation

MCB4 asked the agencies to assess the loss of mature trees, displacement of birdlife, and cumulative environmental impacts, including demolition, construction, and climate risks. MCB4 also stressed the importance of assessing the effects on NYCHA buildings eligible for historic designation. In response, NYCHA noted that “shadow analyses, assessments of tree loss, and open space conditions” will be conducted, and that “historic resources will be evaluated in accordance with local, state, and federal standards” (Responses to Comments 2.2, 2.3). NYCHA also committed to “analyzing the potential impacts to floodplains and natural resources” under updated sea level rise projections.

Displacement and Demographic Analysis

MCB4 requested that the DEIS “analyze direct and indirect residential displacement by race and ethnicity,” as well as extend population projections to 2050 to reflect the full project timeline. NYCHA responded that “the DEIS will assess displacement through the year 2041, consistent with CEQR Technical Manual guidance,” and that “the DEIS will include discussion of racial and ethnic composition” of the affected populations (Response to Comments 1.28, 3.3). The agency declined to extend the projection window to 2050, stating there was “no basis to suggest significant new impacts would emerge between 2041 and 2050.”

Transparency, Financing, and Tenant Rights

MCB4 criticized the lack of a publicly available financial plan, asking NYCHA to “show why development without market-rate housing is not feasible” and calling for a detailed explanation of long-term financing. MCB4 also expressed concern about the transition of residents from Section 9 to Section 8 through PACT. NYCHA responded that “financing is outside the scope of environmental review,” but reiterated that “residents will have the same rights they currently have under public housing” and that “NYCHA will continue to own the buildings and land” under the RAD/PACT program (Responses to Comments 1.24, 1.41).

Public Health and Mitigation Measures

Finally, MCB4 asked the agencies to clarify how mitigation would be monitored and enforced, including air quality, noise, and construction impacts. MCB4 emphasized the need for clearly defined roles and accountability. In response, NYCHA stated that mitigation will be described in detail in “Chapter 5.21: Mitigation,” and that “the DEIS will describe the legal, regulatory, and institutional framework for implementing these measures” (Response to Comment 1.38). NYCHA confirmed that it will consult with agencies including the NYC Departments of Environmental Protection and Health to develop and enforce mitigation protocols.

DEIS Identified Significant Adverse Impacts

As detailed in Chapter 5.21 of the DEIS, the proposed Fulton and Elliott-Chelsea Houses Redevelopment Project is expected to result in multiple significant adverse environmental impacts, many of which are only partially mitigated or remain unresolved. MCB4, in its April 2025 Chelsea Land Use Committee meeting, expressed serious concerns about the insufficiency of these mitigation strategies and the broader implications for the Chelsea neighborhood.

Shadows

One of the most serious adverse impacts identified in the DEIS relates to shadows cast on Chelsea Park and the PS 33 playground. The DEIS states that under all redevelopment alternatives, “incremental shadows would result... for all four analysis days,” leading to “significant adverse shadow impacts” on “sunlight-sensitive resources, including the Chelsea Park athletic field and PS 33 Playground” (FEC_05.21, p. 5.21-2). Despite acknowledging the severity of these impacts, the DEIS concedes that “mitigation measures have not been identified at this time,” though it claims they “will continue to be explored in consultation with NYC Parks” (p. 5.21-3). MCB4 notes this 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.

Historic and Cultural Resources

The DEIS also confirms that the demolition of the Elliott-Chelsea Houses, which are eligible for listing on the State and National Registers of Historic Places, would cause a “significant adverse direct impact” on historic and cultural resources (p. 5.21-7). Without a feasible alternative to demolition, the impact is described as “unavoidable.” Proposed mitigation measures include Level 2 documentation under the Historic American Building Survey (HABS), an unanticipated discoveries protocol, an interpretive display, and construction protection plans for nearby resources, all to be reviewed by the State Historic Preservation Office and New York City Landmarks Preservation Commission, and the Historic Districts Council. However, 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 the 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.

Transportation

Transportation-related impacts are also prominently featured in the DEIS findings. The project is projected to create “unavoidable significant adverse traffic and pedestrian impacts” at several intersections and sidewalk segments during construction and operation, particularly under the Rezoning Alternative (FEC_05.21, p. 5.21-4). Proposed mitigations include signal timing changes, crosswalk and sidewalk widening, and improved pedestrian clear paths. However, the DEIS notes that “implementation of these measures would be subject to NYCDOT approval and feasibility testing” (p. 5.21-4), leaving the possibility that many of these impacts may go unmitigated. 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 (16 billion) and Port Authority Bus Terminal expansion (10.6 billion). The cumulative transportation impacts of those nearby adjacent major infrastructure projects must be studied in coordination with any proposed redevelopment of Chelsea NYCHA.

Construction

Lastly, the DEIS identifies construction noise as a significant environmental impact. It states that expected construction activity would cause “an unavoidable significant adverse noise impact at nearby sensitive receptor locations,” with modeled levels reaching 18 dBA above the 45 dBA residential noise standard (p. 5.21-5). While the DEIS outlines a range of mitigation strategies—including noise barriers, use of quieter equipment, connection to the Con Edison grid, and potential building-specific soundproofing—it ultimately concedes that even with these measures, impacts would remain. The DEIS explains, “With implementation of these noise control measures... the analysis demonstrates that the Proposed Project would still result in unmitigated significant adverse noise impacts” (p. 5.21-5). 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.

CHAPTER 5.1 – Land Use, Zoning, and Public Policy

The DEIS outlines the land use and zoning framework for the proposed redevelopment of the Fulton and Elliott-Chelsea NYCHA campuses, which together comprise 22 buildings—17 residential, 1 mixed-use, 2 community facilities, and 2 garages—containing 2,056 NYCHA units, 67,000 square feet of community facility space, and 95 parking spaces. The sites are primarily zoned R8, with a C2-5 commercial overlay along Ninth Avenue and partial inclusion in the Special West Chelsea District; notably, the Elliott-Chelsea site is not currently within a Mandatory Inclusionary Housing (MIH) area. The DEIS evaluates three primary redevelopment alternatives: Rezoning, Midblock Bulk, and Non-Rezoning. Both the Rezoning and Midblock Bulk Alternatives propose establishing a Large-Scale General Development (LSGD), applying MIH zoning, and increasing the allowable Floor Area Ratio (FAR) from approximately 3.5 to as high as 12.0 on avenue frontages—effectively replacing portions of the West Chelsea Special District—and enabling significantly taller and denser buildings through zoning mechanisms such as the City of Yes for Housing Opportunity (CHO) and Universal Affordability Preference (UAP) programs. The Non-Rezoning Alternative would raise the FAR to approximately 6.0 under existing R8 zoning. However, it would still likely require a Mayoral Zoning Override (MZO) to allow necessary deviations in height and setbacks and to use regulations during phased redevelopment. While the DEIS concludes that none of the alternatives would result in significant adverse land use or zoning impacts under CEQR/NEPA thresholds, it does acknowledge that significant shadow impacts would result from the proposed massing.

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. 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. Additionally, the DEIS fails to specify the new zoning district being pursued or to present alternative zoning strategies that could better align with community values.

MCB4 notes that this proposed plan disproportionately allocates public land for market-rate development, not for affordable housing use. 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.**

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.

Furthermore, many NYCHA residents have consistently voiced concerns about deteriorating living conditions and much-needed repairs. Prior communications between MCB4 and the development team indicated that interim repairs would be made during the redevelopment process. Yet 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.**

MCB4 requests confirmation that the proposed replacement NYCHA units will not result in a net loss of residential floor area compared to current conditions.

Governance and transparency concerns also loom large. The project timeline does not accommodate a complete ULURP process, which typically spans nine months. This raises the possibility that demolition might begin “as-of-right” before formal rezoning—a step the developers previously said they would not pursue. **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.

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. Moreover, 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.

Finally, environmental resilience concerns remain unresolved. While the DEIS states that the site is not currently in a FEMA-designated floodplain, MCB4 points to the DEIS’s acknowledgment that “parts of the primary study area that are within the 500-year flood plain will be within the 100-year floodplain within a decade.” 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.

CHAPTER 5.2 – Socioeconomic Conditions

The DEIS chapter on *Socioeconomic Conditions* (05.02) evaluates whether the proposed redevelopment of the Fulton and Elliott-Chelsea NYCHA campuses would result in direct or indirect displacement of residents or businesses, or affect population demographics, housing affordability, or access to community services. It concludes that “no residents would be permanently displaced” and that “each NYCHA unit would be replaced with a new Project-Based Voucher (PBV) unit” under the PACT program (DEIS, 5.2-4). Up to 120 households are expected to require temporary relocation during early construction phases, with details to be addressed in a future Tenant Relocation Plan compliant with federal Uniform Relocation Assistance (URA) standards. The DEIS further states that “no existing businesses or employees would be directly displaced” and concludes that the risk of indirect residential displacement from rising area rents “would not be significant” under CEQR thresholds (DEIS, 5.2-6, 5.2-13). The chapter asserts that the project can potentially improve “quality of life and housing stability for NYCHA residents” through the PACT program (DEIS, 5.2-15).

MCB4 finds the DEIS’s conclusions on socioeconomic conditions to be incomplete and, in key areas, insufficiently supported by data or policy commitments. **While the DEIS states that no permanent displacement will occur, MCB4 remains deeply concerned about the temporary relocation of up to 120 households and the risk that these moves could lead to permanent disconnection from the neighborhood.** 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.

Moreover, 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.

MCB4 does not support any development approach that results in the economic, ethnic, or racial segregation of residents. **While the DEIS outlines the addition of thousands of affordable and market-rate units, it offers no clear assurances that NYCHA residents will be equitably included in building design, shared amenities, or community spaces.** 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.

The DEIS further claims that no businesses will be directly displaced. Yet, it 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. Hudson Guild was founded in 1898 and has continuously served the Chelsea community for 127 years. Its services to children, after school, teens, and seniors along with mental health must continue uninterrupted and accessible throughout the duration of any proposed development scenario.

The DEIS also briefly addresses the Elliott Center's temporary relocation, without detail on how service continuity will be maintained during construction. Please describe and detail the how will NYCHA ensure that the center's community programs remain accessible during this disruption, especially for seniors, youth, and families who rely on its offerings.

The DEIS asserts that the redevelopment will improve quality of life and housing stability for NYCHA residents, but MCB4 notes the absence of performance metrics or evaluation mechanisms. 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.

Lastly, MCB4 reiterates a concern raised repeatedly by residents and stakeholders: the lack of a clear commitment to interim repairs. Many NYCHA residents have emphasized the need for critical repairs to be completed during redevelopment. Yet, the DEIS references repair work only under the No-Action Alternative, stating that "NYCHA would seek to address the goals of the NYCHA Sustainability Agenda... subject to funding constraints" (FEC_01.0, p. 1-5). This omission raises serious concerns. **NYCHA, Related, and Essence must confirm that interim repairs will continue to be made to ensure health and safety during the proposed multi-year construction period.**

CHAPTER 5.3 – Community Facilities and Services

Chapter 05.03 of the DEIS evaluates the Proposed Project's potential impacts on community facilities, including public schools, childcare centers, and libraries. It finds that while the number of new residents generated by the project would increase demand for these services, no significant adverse impacts would occur under CEQR thresholds. The DEIS triggers a detailed analysis of elementary and intermediate schools, noting that a significant impact is only defined as occurring when school utilization exceeds 100% and the proposed project adds 100 or more students. Under the Rezoning and Midblock Bulk Alternatives, the DEIS projects an addition of 98 elementary and intermediate students, just below that threshold (DEIS, 5.3-12). High schools are excluded from analysis under CEQR guidelines, and community facilities such as Hudson Guild are described as subject to temporary relocation but not permanent displacement (DEIS, 5.3-6). The DEIS draws from 2021 population and enrollment data, when pandemic-related outmigration had reduced public school attendance, and does not account for more recent trends or adjacent land use changes, including the proposed Midtown South Mixed-Use Plan.

MCB4 challenges the conclusion that the Proposed Project will not significantly impact schools. Table 5.03-2 in the DEIS shows that four local schools—PS 11, PS 33, PS 41, and PS 212—already operate above capacity, with utilization rates ranging from 101% to 116% (DEIS, 5.3-11). **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. Failure to account for their unique needs could result in serious disruptions to learning, services, and well-being.

The CEQR methodology's use of a 100-student threshold as a cutoff for significance fails to reflect the reality of schools that are already overcrowded. Any additional students—whether 98 or 150—will further burden already-stretched facilities. 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. The determination that the effect is not “significant” because the number of new students narrowly avoids the CEQR threshold appears more procedural, to avoid an environmental impact than practical.

Moreover, MCB4 questions the relevance of a school impact analysis that relies on 2021 data. That period coincided with historic declines in school enrollment caused by pandemic displacement. Since then, both enrollment and neighborhood population have rebounded, and multiple large-scale housing developments are now being planned or underway. **The DEIS must be updated to reflect current enrollment and school seat usage data.** Consideration must also be given to additional growth from other proposed residential developments (e.g. the recently designated 900 unit, ESD Site K development on West 35th and 11th Avenue). 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, which proposes converting multiple commercial blocks into residential or

mixed-use developments. These changes will significantly increase neighborhood density and service demand, further amplifying the cumulative impact of the proposed project.

In addition to concerns about capacity, MCB4 notes that the DEIS ignores how a large-scale influx of new residents, particularly those with higher incomes, will have ripple effects on public school funding structures. 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. These factors are central to the long-term health and equity of the school system and must be addressed.

The analysis of childcare access also raises red flags. The DEIS states that childcare facilities adequately serve the area, but the study area extends beyond MCB4 and includes distant neighborhoods such as Tribeca. 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. It is not internally consistent that the childcare impact includes Tribeca in lower Manhattan, while the study area for most other impacts is quarter mile radius.

The DEIS also notes that Hudson Guild, which provides childcare and after-school programs, will be temporarily relocated, but does not assess the disruption this may cause. 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.

Finally, 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.

CHAPTER 5.4 – Open Space

The DEIS chapter on *Open Space* acknowledges that the project area already falls well short of the City’s planning goal of 2.5 acres of open space per 1,000 residents, with the current ratio in the study area at just 0.866 acres per 1,000 (DEIS, 5.4-2). **Rather than closing that gap, the DEIS finds that both the Rezoning and Midblock Bulk Alternatives would result in a net loss of over two acres of existing NYCHA open space while significantly increasing the number of residents in the area (DEIS, 5.4-22).** The report states that “none of the action alternatives would result in a significant adverse impact on open space” under CEQR criteria (DEIS, 5.4-3), largely because new project-generated open space would be created. However, that open space will not be publicly accessible but “private, accessory open space” intended solely for residents of the new buildings (DEIS, 5.4-24). 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” and asserts that the proposed project may offer “qualitative improvements” to design, accessibility, and usability (DEIS, 5.4-13). **MCB4 notes for the record, contrary to that assertion, that the Chelsea NYCHA playgrounds are heavily used by NYCHA and other neighborhood residents.** Further, these improvements are described as conceptual and for illustrative purposes only, with no formal commitment or design mandate.

MCB4 rejects the DEIS’s conclusion that the proposed project will not significantly harm the open space environment. The DEIS clearly acknowledges that the project area already falls far below open space planning standards and that the proposed redevelopment would further reduce the total supply of open space while dramatically increasing the number of residents. Yet, CEQR thresholds are used to sidestep the real-world impacts of this reduction. The Board underscores that **“MCD4, including the project area, has one of the lowest amounts of park space per capita in New York City,”**¹ the projected increase in residents will place even greater pressure on a shrinking supply. Please describe and detail the is the justification for not proposing a mitigation strategy to address the projected shortfall, 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.

The DEIS’s treatment of public versus private space also raises serious concerns. While the new open spaces would be designated as “private,” the existing NYCHA campuses have long functioned as quasi-public, neighborhood-serving resources. Residents and neighbors use benches, courtyards, and play areas regardless of formal designations. Yet under the proposed plans, all new open space would be restricted to residents of the redeveloped buildings. Please describe and detail the is 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?

MCB4 also highlights the absence of a strategy to address increased demand. The DEIS claims the proposed project will not displace existing public open space. Still, it fails to account for how added density will effectively diminish the quality and accessibility of the remaining open space. Please describe and detail the measures will be taken to manage this increased demand 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.**

The DEIS refers to qualitative improvements—including updated landscaping, visibility, and design—but provides no plan for implementation or community oversight. Please detail the plan and mechanisms for 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. The DEIS also mentions that many NYCHA open spaces are underutilized, yet it does not commit to modernizing or improving access before redevelopment. Please detail and describe the specific initiatives to address these design failures and make the existing spaces accessible and useable during the proposed 10 to 20-year construction period.

MCB4 acknowledges that some proposed alternatives include open courtyards and connected block-to-block design elements, which could provide visual and physical relief. However, these elements are only illustrative. Please describe and detail if these proposed new courtyards be

¹ In open space, MCB4 ranks 57 out of 59 Community Boards

sunlit and usable year-round, please describe and detail proposed midblock walkways to be incorporated to support neighborhood connectivity.

Finally, the DEIS does not mention how the proposed project will coordinate with institutions like Hudson Guild that provide open space programming and community access. Please describe and detail the mechanisms to ensure these institutions are included in future site planning. 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.

CHAPTER 5.5 – Shadows

The DEIS (Chapter 05.05) acknowledges that all three development alternatives—the Rezoning, Midblock Bulk, and Non-Rezoning Alternatives—would have significant adverse shadow impacts, particularly on Chelsea Park and the P.S. 33 Playground. It further identifies incremental shadowing on the High Line, Hudson River Park Esplanade, 18th Street Plaza, Church of the Holy Apostles, and GreenStreet at 9th Avenue. Yet it stops short of categorizing these as significant adverse effects. The report concedes that mitigation measures have not yet been identified but asserts that they will be “developed in consultation with NYC Parks” (DEIS, 5.5-24).

MCB4 finds this approach insufficient. Shadow lengths were calculated in the DEIS as 4.3 times the height of the new structures, meaning towers of 30 to 39 stories would cast shadows stretching multiple blocks. As noted in community correspondence, “The sites most impacted by increased shadows daily/annually are the High Line, Chelsea Park, Hudson River Park Esplanade, PS33 playground, GreenStreet & 9th Avenue, and the Church of the Holy Apostles”. These are not peripheral locations—they are core public amenities, open spaces, and cultural landmarks that NYCHA residents and the broader Chelsea community rely upon. The DEIS offers no firm timeline or transparency around discussions with NYC Parks. Please describe and detail mitigation measures explored to date. Please describe and detail any design revisions or programmatic changes have been considered to minimize these impacts.

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. 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.

Please provide an analysis of the interior daylight impact at PS 33, including classrooms, offices, and other spaces with west- and south-facing windows. A study of interior light conditions is essential to understanding how shadow impacts may affect learning environments and daily use, particularly for students and staff throughout the year.

Finally, MCB4 notes that shadow impact modeling relied heavily on seasonal averages and broad open space typologies classifications rather than detailed, time-specific usability studies. As the Board and residents have stated, “Reducing the impact of shadows would require

reducing the size and/or relocating the buildings.” Meaningful mitigation must seriously be considered. 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.

CHAPTER 5.6 – Historic and Cultural Resources

The DEIS acknowledges that demolishing the Elliott-Chelsea Houses would cause a significant adverse impact to historic resources but asserts there is “no prudent and feasible alternative to demolition,” claiming that new development is necessary to “improve the quality of life and housing stability for existing NYCHA residents” (DEIS, 05.06-17–18). However, this conclusion 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.

Compounding the concern is 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.

Meanwhile, 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.

The DEIS’s rationale for demolition is further undermined by its attempt to reframe the project’s goals. It repeatedly claims that the project is necessary to address the citywide affordable housing crisis, even though “providing new apartments to ‘directly address the critical shortage of affordable housing’ was never a goal of the RFP that initiated the project.” This retroactive justification should not be used to override legitimate preservation concerns.

Please describe and detail the language and basis 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.

MCB4 finds the absence of a meaningful range of preservation-based alternatives inconsistent with public environmental practice and policy. Alternatives 6 (renovation and infill with partial demolition), 8 (middle-income housing), 9 (regulatory agreements and deed restrictions), and 10 (superblocks) were all requested by MCB4 in comments on the Draft Scope of Work but were not chosen to be analyzed in the DEIS. Only a limited version of Alternative 5 and Alternative 7 (midblock bulk) are presented, and even these are inadequately developed. Please detail why were the other alternatives excluded despite repeated community and elected official requests. Please detail the minimum level of demolition that NYCHA considers financially feasible under Alternative 6. Absent this requested study, the DEIS leaves unanswered the question of whether demolition is necessary.

MCB4 further notes that NYCHA has repeatedly denied public requests for building condition reports and renovation estimates for FEC. MCB4 again requests NYCHA make these essential documents publicly available.

According to NYC Department of Buildings records, 16 of the 18 residential buildings at the Fulton and Elliott-Chelsea campuses have open façade violations stemming from a failure to comply with the City’s legally mandated Facade Inspection Safety Program, with many of these violations dating back to 2022 or earlier. This information is relevant to the DEIS because it raises questions about whether building conditions have been formally assessed or documented in a manner that supports the conclusions presented. If mandated inspections have not been completed, the determination that rehabilitation is infeasible may rest on incomplete or unverified data. In this context, 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.

An itemized cost comparison with Edenwald Houses, which has a similar number of units and building typology, should be released. This analysis must also account for key differences, including the fact that only Elliott Houses (not Chelsea, Chelsea Addition, or Fulton) predate New York City’s 1960 lead paint ban and that the site may qualify for Historic Preservation Tax Credits. Please explain and detail why DEIS conflates lead-paint abatement issues across all buildings.

The DEIS also falls short in its urban design and visual analysis. The claim that towers of up to 39 stories “would be built out to the lot lines” and be “more contextually appropriate” is unsupported and directly contradicts planning goals outlined by elected officials and MCB4. As stated earlier, “the buildings must be designed to integrate with the existing neighborhood fabric... achieving similar street wall heights wherever possible.” The DEIS dismisses visual impacts on surrounding historic resources as negligible yet includes few requested isometric and photomontage views that would allow the public to evaluate these claims fully. Please detail and describe how 39 story buildings of such be considered contextual when surrounded by nearby low-rise historic buildings.

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.

MCB4 asks which parties will be responsible for managing mitigation efforts. The DEIS proposes signage and interpretive materials to honor the history of the Elliott-Chelsea Houses post-demolition but does not clarify oversight. 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.

In conclusion, MCB4 finds that the DEIS's treatment of Historic and Cultural Resources lacks the depth and accuracy warranted by a project of this scale. To address these deficiencies, MCB4 requests the full incorporation of its original DSOW comments (See Appendix B – Draft Scope of Work: Historic and Cultural Resources). These comments outline specific, unaddressed analysis requests and offer a detailed account of Chelsea's historic character—essential to ensuring the final plan reflects both the community's heritage and the project's obligations.

CHAPTER 5.7 – Urban Design and Visual Resources

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.

The DEIS acknowledges that final design details will be developed after resident consultation. Yet skepticism remains high given NYCHA's track record of vague survey processes and minimal participatory input. 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.

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.

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. Additionally, 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.

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.

CHAPTER 5.8 – Natural Resources

Chapter 05.08 of the DEIS concludes that the Proposed Project would not significantly adversely impact natural resources. The project area is reported to be fully developed, lacks sensitive ecological features, and does not lie within a designated floodplain. While mature trees exist on-site, the DEIS asserts that new landscaping and adherence to NYC Parks and NYSDEC guidelines would mitigate any tree removal. The DEIS also claims that future development would comply with applicable local, state, and federal soil and habitat preservation laws.

Despite the DEIS finding no significant adverse impacts, MCB4 is deeply concerned about the planned removal of over 370 mature trees surveyed by community members and the absence of any meaningful analysis of the cumulative environmental and livability consequences. The document references that "NYSDEC imposes no restrictions on tree cutting unless a project is located within 5 miles of a known hibernation site or 1.5 miles of a documented summer occurrence" (DEIS 05.08-12), but this regulatory citation misses the point. Mature urban trees contribute significantly to ecosystem services such as heat reduction, air quality, and stormwater management. 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.

CHAPTER 5.9 – Hazardous Materials

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.

MCB4 supports the requirement for lead remediation but remains alarmed by the DEIS's conflation of contamination across all Elliott-Chelsea buildings. The DEIS states that lead-based paint is a justification for complete demolition, but it fails to distinguish between buildings. Only the Elliott Houses were constructed before the city banned lead paint in 1960. This misrepresentation is used to support the rationale for demolition. Such a rationale has implications for the feasibility of historic preservation or renovation of any existing structure

anywhere in the City of New York. Hundreds of thousands of apartments contain lead paint, they have been and continue to be remediated most often with tenants in place. This claim is simply not supported by actual practice in building renovation in the City of New York. 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.

CHAPTER 5.10 – Water and Sewer Infrastructure

The DEIS concludes that the proposed redevelopment of the Fulton and Elliott-Chelsea Houses would not significantly adversely impact New York City's water supply, wastewater, or stormwater infrastructure. It estimates that the project would add approximately 630,000 gallons per day (gpd) of new water demand and over 1 million gpd of wastewater, representing a 0.5% increase in average daily flow to the North River Wastewater Resource Recovery Facility (WRRF), which currently handles 113 million gpd. The DEIS cites compliance with the City's Unified Stormwater Rule and a future Site Connection Proposal as sufficient assurances that DEP infrastructure can manage the added load. However, these conclusions are premature and incomplete. The DEIS fails to include a completed hydraulic analysis, omits evaluation of the condition of surrounding infrastructure, some of which dates to the 19th century, and does not assess cumulative impacts from nearby development projects.

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. Any shortfall in capacity could require costly off-site upgrades or result in raw sewage discharges into the Hudson River during storm events. The North River WRRF processes combined sewage and stormwater from a 5,500-acre catchment area and experiences extreme inflow during wet weather, up to 50 times normal levels, triggering Combined Sewer Overflows (CSOs). The proposed redevelopment would contribute up to 0.54 million gallons of additional wet-weather flow composed of runoff, oil, and debris, exacerbating an already overburdened system.

Infrastructure at and around the site is aging and inadequately assessed. Adjacent sewer lines date back to 1867, including brick and cast-iron components of uncertain composition and capacity. Water mains beneath the site include a 24-inch pipe installed in 1870 and others dating to 1907. Please describe and detail the evaluations have been conducted to determine whether these water systems are structurally and functionally capable of supporting the proposed load. The DEIS does not say. Further, 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.

The DEIS relies heavily on future compliance with DEP's Unified Stormwater Rule as mitigation, referencing possible use of green roofs, detention tanks, bioswales, and permeable pavement. However, it does not include performance modeling of these systems, fails to specify which Best Management Practices (BMPs) will be implemented, and omits any analysis of their cumulative effectiveness. 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. Without this analysis, claims of mitigation remain unproven. MCB4 is also concerned about the lack of ambition to exceed minimum regulatory requirements or anticipate future climate risks. 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. These strategies could permanently reduce pressure on the combined system and provide resiliency in the face of worsening weather extremes.

Equally problematic is the lack of cumulative impact analysis. The DEIS considers this project in isolation, despite acknowledging multiple large-scale developments underway in the surrounding area. **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.

Finally, MCB4 stresses the need for transparency and accountability. MCB4 requests NYCHA commit to releasing the full hydraulic modeling results and infrastructure assessments prior to the Final EIS is certified. These critical evaluations be subject to public review and comment. Without concrete answers to these questions, the project's environmental claims remain speculative, and its impacts on aging, overburdened infrastructure remain inadequately addressed.

CHAPTER 5.11 – Solid Waste and Sanitation Services

The DEIS concludes that the proposed redevelopment of the Fulton and Elliott-Chelsea Houses would not significantly impact New York City's solid waste or sanitation systems. Under the Rezoning and Midblock Bulk Alternatives, the project is expected to generate over 50 tons of solid waste per week by the 2041 build year, exceeding the City Environmental Quality Review (CEQR) Technical Manual threshold and thus requiring further analysis. The Non-Rezoning Alternative is projected to fall below this threshold at 42.1 tons per week, but the DEIS still includes it for assessment.

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.

MCB4 raises serious concerns about these omissions and calls for the integration of modern, high-performance waste systems. This total redevelopment of a dense urban area presents a unique opportunity to implement state-of-the-art solid waste and wastewater solutions that align with the City's Zero Waste and climate resiliency goals.

MCB4 requests the following to be studied and incorporated into the project design:

- Trash compactors in buildings and facilities to reduce solid waste volume.
- Indoor storage of all trash materials in designated facility areas; garbage trucks should never be stationed curbside.
- Pneumatic waste pipe systems that separate trash, recyclables, and compost at the source and transport waste underground to centralized collection areas—such as those currently used at the NYCHA Polo Grounds complex and on Roosevelt Island—can eliminate the need for unsightly and unhygienic street-level bins and reduce truck traffic. However, their effectiveness and resident reception should be further analyzed before broader replication, drawing on lessons learned from both New York City precedents.
- Solar trash bins and compactors, including balers for cardboard and other high-volume materials.
- On-site e-waste containers to support responsible disposal of electronics.
- Balers and compactor containers should be used in lieu of dumpsters to minimize spatial and visual waste footprints.

In addition to these solid waste systems, 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.

MCB4 requests the following items, some of which are mentioned in the DEIS but not analyzed, be fully studied and addressed:

- A hydraulic analysis of the existing sewer system, and an amended drainage plan based on the findings.
- A structural condition assessment of the existing water mains to ensure they can meet incremental demand.
- A dual stormwater system to separate stormwater from sanitary sewer loads and reduce CSO risk.
- Blue roofs or similar stormwater retention strategies to reduce runoff and improve resilience to extreme weather.

The DEIS also fails to clarify how waste management will function during phased construction, when both new and old buildings will be in operation simultaneously. Please describe and detail waste 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?

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. Cleanliness, resident dignity, operational efficiency, and environmental stewardship must be guiding principles of this transformation.

CHAPTER 5.12 – Energy

The DEIS states that the proposed redevelopment will increase energy consumption but will not significantly impact citywide or regional energy supply. Energy demand estimates are based on City Environmental Quality Review (CEQR) Technical Manual formulas and assume compliance with the 2020 New York City Energy Conservation Code and relevant Local Laws. The analysis is based on the current Con Edison infrastructure, which includes 62 substations, over 98,000 miles of underground lines, and multiple local generation facilities.

However, 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.

MCB4 finds the DEIS’s energy treatment deeply insufficient, especially given the scale and timeline of the proposed redevelopment and the City’s binding climate mandates. The report makes no mention of net-zero buildings or zero-energy buildings (ZEBs), which are specifically designed to produce as much energy on-site as they consume, primarily through renewable solar and wind sources. The report does not mention Passive House or LEED standards for environmental performance.

The buildings proposed in this project will include vast rooftop square footage—an ideal opportunity for installing solar panels, energy storage systems, and rooftop infrastructure to help each building meet a significant portion of its power needs.

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

The DEIS’s reflexive reliance on Con Edison illustrates a lack of forward thinking and failure to account for modern green energy options. The absence of robust renewable energy planning is a critical flaw in a project that will reshape an entire neighborhood and define energy use for decades. A climate-resilient, future-ready housing development must not default to 20th-century infrastructure models. It must leverage 21st century technology, integrate renewables and storage, and address the economic realities of energy cost burdens on public housing residents. This project represents a once-in-a-generation opportunity to align deep equity with deep decarbonization—and the DEIS must reflect that mandate.

MCB4 finds the DEIS's treatment of energy deeply insufficient given the climate and equity stakes involved. By treating energy as a compliance issue rather than a resilience and affordability challenge, the DEIS misses a crucial opportunity to align with Local Law 97, the City's carbon neutrality goals, and the NYCHA Sustainability Agenda. 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.

CHAPTER 5.13 – Transportation

The DEIS finds that the proposed redevelopment would substantially adversely impact transportation infrastructure, particularly under the Rezoning and Midblock Bulk Alternatives. These alternatives would increase the number of residential dwelling units by over 3,400 and introduce nearly 55,000 square feet of new retail and community facility space, resulting in a notable surge in vehicular, pedestrian, and transit trips by the 2041 Build Year. According to the DEIS, the project would create significant adverse impacts at 11 intersections, six sidewalks, and two crosswalks during peak hours. While some mitigation measures—such as retiming traffic signals—are proposed, the DEIS concedes that specific pedestrian and traffic impacts cannot be fully mitigated and may remain unaddressed in the Final EIS. Notably, no design-based safety improvements (e.g., sidewalk widening, curb extensions, or protected crossings) are included, and mitigation is contingent upon future consultation with NYCDOT.

MCB4 is deeply concerned that the DEIS lacks a comprehensive transportation strategy proportional to the project's scale and timeline. The DEIS takes a technical, site-specific approach to impact assessment but neglects local residents' broader, lived reality, especially those in NYCHA housing, senior buildings, and households with mobility challenges. The Transportation Planning Committee (TPC) has repeatedly raised concerns that have not been meaningfully addressed in the DEIS. For example, 27th Street is identified as a key pedestrian corridor used by seniors at Chelsea Addition and families accessing Hudson Guild. Yet, no plans are offered to maintain safe pedestrian passages during construction or mitigate post-development traffic pressures. TPC has urged the City and NYCHA to consider transforming 27th Street into a shared street that prioritizes pedestrians and reduces vehicular speed—a recommendation that remains unacknowledged in the document.

Furthermore, the DEIS omits any clear plan for construction-phase traffic management, a critical oversight given the density of the surrounding area and vulnerability of nearby residents. There is no mention of how sidewalk closures, truck routing, staging areas, or disruptions to MTA bus routes will be handled. 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.

Transit impacts are similarly underdeveloped. While the DEIS includes a trip generation analysis, it fails to evaluate crowding or service capacity on nearby subway lines or MTA bus routes. The closest transit hubs—such as the 23rd Street C/E and 28th Street #1 lines—already experience peak-hour congestion, yet there is no coordination plan with the MTA to ensure adequate service levels or station improvements. 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.

Even more troubling is the absence of a cumulative impact analysis, even though the redevelopment occurs within a rapidly transforming district. As the DEIS acknowledges, 14 of the 25 intersections studied are already congested—10 alone along 10th Avenue. Yet the document fails to account for the impacts of concurrent projects, including the Gateway Tunnel, Hudson Yards Phase II, the Port Authority Bus Terminal reconstruction, and planned changes to 9th Avenue's "super sidewalk." 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.

Lastly, MCB4 highlights the lack of any detailed pedestrian safety or accessibility plan. The DEIS identifies dangerous intersections but fails to propose meaningful design solutions. Signal retiming alone cannot protect vulnerable users, especially in an area with multiple senior housing facilities, childcare centers, and schools. MCB4 specifically flagged the need to improve the 8th Avenue and 25th Street crosswalk, calling for extended crossing times and reprogramming traffic signals. Yet this intersection is not a priority in the DEIS mitigation plan. Please describe and detail the process to determine which intersections receive 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.

CHAPTER 5.14 – Air Quality

The DEIS concludes that the proposed redevelopment of the Fulton and Elliott-Chelsea Houses would not result in significant adverse air quality impacts under any of the three build

alternatives. It emphasizes that new buildings would use all-electric systems for heating and hot water, eliminating the need for fossil fuel combustion on-site—a positive shift from the existing NYCHA steam fired boiler plants that currently serve the Chelsea NYCHA campuses. However, these 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. Mitigation measures such as increasing stack heights and prohibiting rooftop amenities and air intakes near emissions points are proposed and would be memorialized in legally binding agreements. The DEIS also confirms that one intersection—10th Avenue and 17th Street—exceeds the CEQR threshold for PM2.5 under both the Rezoning and Midblock Bulk Alternatives. However, the DEIS dismisses the PM2.5 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 PM2.5 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.

Additionally, the DEIS fails to include any quantitative assessment of construction-related emissions, despite a phased buildout expected to span 10 to 20 years and involve extensive demolition, excavation, and diesel truck traffic. Given the scale and duration of the project, the lack of a comprehensive construction air quality impact analysis is a glaring omission. 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.

CHAPTER 5.15 – Greenhouse Gas Emissions and Climate Change

The DEIS asserts that the proposed project is consistent with the City's greenhouse gas (GHG) emissions reduction goals under Local Law 97 and related sustainability initiatives. It estimates that new buildings will use all-electric systems and comply with the 2020 New York City Energy Conservation Code, supporting the City's decarbonization efforts. However, the DEIS does not provide a complete lifecycle carbon assessment of the proposed demolition and new construction versus rehabilitation. This is critical for transparent evaluation. The DEIS conservatively assumes that emissions from the new buildings will be equivalent to existing conditions, even though the proposed structures are expected to be far more efficient and fossil fuel-free. This assumption prevents an honest evaluation of long-term emissions savings and the carbon cost of demolition, material production, and new construction. It also overlooks the potential climate benefits of concentrating more residents in efficient, transit-accessible multifamily housing near the city core.

MCB4 acknowledges the intention to meet emissions reduction targets but is deeply concerned about the lack of analysis behind this assertion. **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. Without such data, it is impossible to weigh the long-term sustainability of the proposed alternatives. Moreover, 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. 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 reloaded existing buildings, and the avoided emissions from smart growth. Such a study is essential to making an informed, climate-resilient decision about the future of public housing in Chelsea.

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.

CHAPTER 5.16 – Noise Abatement and Control

The DEIS concludes that, with appropriate design measures, the proposed project would not result in significant adverse noise impacts for future residential or community facility uses. It evaluates projected traffic volumes, playground noise, and cumulative sound exposure, recommending up to 33 dBA of window/wall attenuation and alternate ventilation systems to meet HUD and CEQR interior noise standards. These measures would be implemented through legally binding agreements between NYCHA and the PACT partner. However, 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.

MCB4 is 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 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, MCB4 recommends 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.

MCB4 is 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 Technical Manual 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.

Beyond these issues, the DEIS must go further to address how noise will be proactively and transparently managed across the entire redevelopment.

- Please describe and detail the advanced mitigation strategies will be deployed, such as acoustic curtains, sound-dampening barriers, noise-dampening fencing, or real-time noise monitoring.
- Please describe and detail how noise will be controlled during evening or weekend work, especially in the case of utility or emergency repairs.
- Please detail which parties NYCHA and other community residents will call if construction noise becomes intolerable.
- Please describe and detail the formal recourse or complaint resolution process will be made available to NYCHA and community residents.
- Please confirm NYCHA or and 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,
- Please confirm NYCHA will establish a dedicated resident complaint process and publishing real-time noise data.

Noise is not a secondary issue—it is a daily reality that will shape quality of life for thousands of residents and students over the next two decades. MCB4 requests NYCHA and the City to 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.

CHAPTER 5.17 – Public Health

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 a 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.

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 population growth will result in increased need for all aspects of care—medical, dental, and behavioral health, including geriatric, intensive care, labor and delivery, OB-GYN, pediatric, primary (inpatient and outpatient), psychiatric, trauma, and surgical services. However, no analysis is provided to determine whether local hospitals and clinics can absorb this demand, nor is there consideration of system-wide strain. 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. A full assessment of health care demands, and emergency room usage must be conducted to evaluate how this development will affect public health.

Additionally, 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 be 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 that a broader range of health insurance acceptance.

Additional Public Health Considerations

Resident Accessibility and Accommodation Commitments

In response to public testimony and community board concerns, 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 professionals during relocation planning to ensure continuity of care and housing function.
- A commitment that no resident requiring medical or mobility-related accommodations will be moved until a comparable or superior unit is available.
- 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.

CHAPTER 5.18 – Neighborhood Character

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 Technical Manual 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 assertions by community members, including those who view NYCHA’s architecture and social history as essential to Chelsea’s fabric.**

The concept of neighborhood character also encompasses social cohesion, a sense of place, and multi-generational continuity.

- 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 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 eliminate the need for height limits or design constraints

CHAPTER 5.19 – Construction

The DEIS outlines that the redevelopment will occur in multiple phases spanning from 2025 through 2041, potentially lasting 16 years, and involving the demolition of existing structures and the construction of up to 17 new buildings totaling approximately 5.2 million gross square feet. Over this period, the DEIS acknowledges that the project will result in “significant adverse impacts” related to traffic, pedestrian circulation, noise, and access, particularly during peak construction periods. Vehicular congestion is projected to increase at several intersections, including at 9th Avenue and 25th Street, where traffic will worsen during construction phases. The DEIS further notes that pedestrian flow will be disrupted by sidewalk and crosswalk closures, which will require rerouting and may remain unmitigated at key locations. Noise levels are expected to exceed CEQR thresholds in areas surrounding the site, especially near existing residential buildings, schools, and daycare centers. At the same time, air quality will be compromised by dust and diesel emissions from heavy equipment and trucking activities.

Although mitigation strategies are proposed, such as using EPA Tier 4-compliant equipment and ultra-low sulfur diesel fuel, the DEIS concedes that “certain impacts would remain unmitigated due to the duration and extent of the construction period.” **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.**

Given the unprecedented scale and duration of the construction, MCB4 emphasizes the urgent need for a transparent, enforceable construction management plan developed in coordination with the community.

- Please describe and detail the mechanisms will be in place to monitor and enforce construction mitigation protocols.

- Please describe and detail the accountable parties, NYCHA and/or its the private development partners, regarding construction management
- Please describe and detail the oversight structure to ensure construction disruptions remain within legal thresholds and that remedies are promptly implemented when violations occur.
- 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.
- 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.

With such a long construction timeline, proactive communication, responsive feedback systems, and local accountability must be considered essential project components, not ancillary measures.

CHAPTER 5.20 – Environmental Justice

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. By incorporating these affluent areas into the assessment, the DEIS obscures the visibility of concentrated impacts on the actual EJ population—the residents of the Fulton and Elliott-Chelsea Houses. As the DEIS itself notes, within this broader study area, “approximately 42.7 percent of the population identifies as non-Hispanic White,” and median household income exceeds \$123,000—a statistic that does not reflect the demographics or lived experiences of public housing tenants directly affected by the redevelopment.

This methodological flaw results in a diluted analysis that fails to center the voices and vulnerabilities of those most exposed to the environmental burdens of the project, including construction-related noise, dust, air pollution, loss of open space, and the psychological and physical stress of displacement risk. 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.

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.

Moreover, the DEIS does not describe any formal structure to ensure that NYCHA tenants have a sustained role in decision-making as the redevelopment progresses. 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.
- Please describe and detail the mechanisms to be implemented to ensure NYCHA resident receive the full benefit of redevelopment, without bearing a disproportionate share of the physical, emotional, and environmental costs.

Without these safeguards, the DEIS's conclusion that the project does not cause disproportionate EJ impacts remains unsubstantiated and incomplete.

Additional Environmental Considerations

Wind Effects

The DEIS fails to address several pressing environmental issues, chief among them the lack of any study on how the proposed development's tall towers will affect wind patterns in the neighborhood. 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.

Equally concerning is the absence of MCB4's primary environmental oversight request.

- 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.

This expert would ensure that the latest and most effective green infrastructure strategies are incorporated from planning through construction, and would provide ongoing, transparent monitoring to verify that environmental safeguards are upheld.

Sustainability

In addition, 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

These elements are necessary to ensure that this once-in-a-generation public housing redevelopment supports climate resilience, health equity, and forward-thinking environmental design.

Environmental Justice in School Health Protections

The DEIS also fails to address a key environmental justice concern: the need to protect student health and safety at PS 33 and PS 138 during multi-year construction. Both schools serve children from predominantly low-income families, and PS 138, as a District 75 school, supports students with significant medical, cognitive, and developmental challenges. These populations are particularly vulnerable to environmental harms, including construction-related air pollution, rodent activity, and unsafe outdoor conditions. MCB4 requests that the DEIS include specific monitoring and mitigation plans for air quality, pest control, and environmental health safeguards at both school sites. These protections must be continuous, transparent, and responsive to student needs to uphold environmental justice standards and prevent disproportionate impacts on children with the least ability to advocate for themselves.

Conclusion

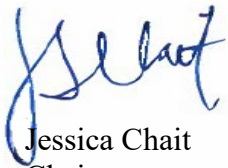
MCB4 acknowledges the effort made by NYCHA, HPD, and their agency partners to address the scope and complexity of this redevelopment. We recognize the inclusion of multiple alternatives and the documentation of significant adverse impacts in several technical areas. **However, the DEIS leaves too many essential questions unanswered and too many mitigation strategies undefined.**

A key area requiring greater clarity is the economic evaluation of project alternatives, particularly the Infill/Rehabilitation plan, which is the only option that preserves existing buildings and avoids full-scale demolition. **The community deserves a transparent and consistent explanation of how financial feasibility has been assessed across scenarios. The**

DEIS concludes that the Infill/Rehabilitation Alternative is infeasible yet offers little supporting data. Additionally, the Non-Rezoning Alternative warrants deeper analysis. This option may reduce several key adverse impacts—particularly those related to Transportation, Shadows, and Construction—to more manageable or mitigable thresholds.

Those most affected—longtime residents, neighbors, and families who call Fulton and Elliott-Chelsea home—deserve honest answers, not assumptions; meaningful accountability; and a planning process that centers their lives, not just the project’s timeline. With deeper analysis, transparent dialogue, and thoughtful adjustments, there is still an opportunity to shape a redevelopment plan that reflects the needs of the community, upholds environmental and social responsibility, and delivers long-term public value. We urge the lead agencies to respond directly to the critical questions raised throughout this submission and to reflect them substantively in the Final Environmental Impact Statement.

Sincerely,



Jessica Chait
Chair
Manhattan Community Board 4



Gregg Morris
Chair
Chelsea Land Use Committee

CC: Hon. Eric Adams, Mayor
Hon. Jerrold Nadler, U.S. Congress
Hon. Brad Hoylman-Sigal, State Senator
Hon. Tony Simone, State Assembly Member
Hon. Mark Levine, Manhattan Borough President
Hon. Erik Bottcher, City Council
Jonathan Gouveia, Executive Vice-President for Real Estate Development, NYCHA
Jamar Adams, Managing Principal, Essence Development
Greg Gushee, Executive Vice President, Related Companies

Appendix A – Infill Sites from Chelsea NYCHA Working Group Report

The table below [CFS Recommended Sites & Flood Proofing Requirements by NYCHA Campus - Chelsea NYCHA Working Group, February 2021] includes all infill sites vetted by the Chelsea NYCHA Working Group as part of its recommended strategy to generate revenue for comprehensive rehabilitation while avoiding demolition of existing NYCHA buildings

These sites are: **Site A (429 W 16th Street)**, proposed for residential infill with **105 units** and a land value of **\$19,836,303**; **Site B1 (17th Street Playground)**, generating **105 units** and valued at **\$14,643,553**; **Site B2 (424 W 18th Street)**, projected to yield **149 units** with a land value of **\$28,123,313**; and **Site C1 (433 W 19th Street)**, producing **101 units** valued at **\$18,650,949**.

At the Elliott-Chelsea campus, **Site CE1 (27th Street at Hudson Guild)** was included with **136 units** and a projected land value of **\$3,812,654**, and **Site CE2 (26th Street Dumpster location)** was proposed for **99 units** valued at **\$18,758,272**. **Site C2 (19th Street Playground)** was evaluated for **95 units** but ultimately excluded based on Working Group deliberations; no land value was assigned. Collectively, the included sites account for **790 new units** and more than **\$103 million in total projected land value**, based on conservative modeling reviewed by NYCHA.

Site #	Building Footprint (SF)	# of stories	GFA (SF)	Net GFA (SF)	Total Apts	Proposed Use	Present in Flood Plain	Flood Proofing (Wet/dry)	BFE (2015 PFIRMS)	Value to NYCHA
Fulton										
Site A	4,800	22	105,600	84,480	105	Residential	0.2%	Dry ^a		19,836,303
Site B1	4,800	22	105,600	84,480	105	Residential	0.2%	Dry	0.1-2 ft	14,643,553
Site B2	6,800	22	149,600	119,680	149	Residential	0.2%	Dry	0.1-2 ft	28,123,313
Site C1	4,600	22	101,200	80,960	101	Residential	0.2%	Dry	0.1-4 ft	18,650,949
Site 1	8,083	2	14,883	13,394	0	Office/Community	0.2%	Dry		4,785,203 (combined value for Office or Comm Facility Infill at 1, 2, 3, & G)
Site 2	4,410	2	7,710	6,939	0	Office/Community	0.2%	Dry	0.1-2 ft	
Site 3	7,200	2	14,400	12,960	0	Office/Community	0.2%	Dry	0.1-2 ft	
Site G	1,625	1	1,625	1,544	0	Office/Community	0.2%	Dry	0.1-2 ft	
Site D	1,200	1	1,200	1,140	0	Retail Infill & Retrofit		Wet		4,698,173 (combined value for Fulton Site Retail Retrofit at D, E, F, & Infill F & E)
Site E	1,000	1	1,000	950	0	Retail Infill & Retrofit		Wet		
Infill Site F and E	3,800	1	3,800	3,800	0	Retail Infill & Retrofit		Wet		
Site F	1,300	1	1,000	950	0	Retail Infill & Retrofit		Wet		
Total	49,618		507,618	411,277	460					\$90,737,494
Elliott Chelsea										
Site EC 1	5,692	24	136,608	27,322	109,286	Residential Community Facility		Dry		\$ 3,812,654 (combined value for Site EC1 & I)
Site I	18,000	2	18,000	1,800	16,200	New Construction	0.2%	Dry		
Site EC 2	4,500	22	99,000	19,800	79,200	Residential		Dry		\$18,758,272
Site H	11,800	1	11,800	590	11,210	Office/Community	0.2%	Dry		\$ 7,599,294
Total	71,628		265,408		215,896					\$30,170,220
TOTAL										
	Total Bldg Footprint		Total GFA (SF)	Net GFA (SF)						Total Value to NYCHA
	89,610		773,026	627,173						\$120,907,714

Appendix B – Draft Scope of Work: Historic and Cultural Resources

As noted in the Draft Scope of Work comments (Section F.4.6, page 12), MCB4 provided detailed input on Historic and Cultural Resources, including requests for visual impact studies, shadow analyses, and evaluation of historic preservation strategies such as rehabilitation using Federal Historic Tax Credits. These comments also emphasize the architectural significance of nearby landmarks like Cushman Row and the eligibility of the Elliott-Chelsea Houses for historic designation—considerations that must be meaningfully addressed in the Final EIS.

Historic Resources:

The Draft Scope of Work cites several designated New York City landmarks and historic districts (NYCL) and buildings that are listed or eligible for listing on the State and National Registers of Historic Places (S/NR). The analysis must provide three dimensional aerial views of the project options and surrounding areas highlighting these and including all buildings within a 400-foot radius of the project sites. This would be helpful in understanding the impact of design options on these historic resources. Apply shadow studies described under Section F.4.5 to the 3D images.

As noted, the area includes individual landmarks and historic districts, as well as areas being considered for further landmark designation, including the Bayard Rustin Educational Complex which the Draft Scope of Work cites as SN/R-eligible. Similarly highlight this area in the aerial views, along with the few non-listed or -designated but historically or architecturally significant sites listed below.

Specifically, provide isometric views of each project site from the nominal northeast, northwest, southeast, and southwest (adjusted for the street grid's 29-degree rotation), labeling and color coding:

- project sites and buildings in color 1;
- NYCL in color 2;
- S/NR-listed or -eligible in color 4;
- buildings and historic-district areas that are both S/NR-listed or -eligible and NYCL in color 5; and
- other historic buildings identified below in color 6:
 - the five Greek Revival row houses at 452-460 W. 25th Street.
 - the Chelsea Health Center building at 303 Ninth Avenue; and
 - the paired tenement buildings at 110 Ninth Avenue and 363 West 17th Street.

Provide S/NR descriptions of all listed and eligible buildings and historic districts, including the SN/R-eligible Elliott-Chelsea Houses Project Site buildings.

Two important groups of Greek Revival row houses may be particularly impacted by the project options and deserve additional consideration: Cushman Row at 408-418 West 20th Street; and the group of houses at 437-459 West 24th Street. Cushman Row in the Chelsea Historic District is considered of national importance and one of New York's two most significant ensembles of Greek Revival houses (along with those on the north side of Washington Square), and 437-459

West 24th Street were designated individual New York City landmarks in 1970. Adding to their sensitivity, Greek Revival row houses are Chelsea's signature historic building type and speak of its original development as a genteel residential community. The tallest current Fulton Houses buildings fall just short of being visible above Cushman Row. Current Elliott-Chelsea Houses buildings are likewise not visible above 437-459 West 24th Street. We ask that the areas where project alternatives rise into the zone of visibility above the rooflines of these two groups are highlighted, applying a line of sight from six feet above the far side of their opposite sidewalks.

Cushman Row is also in the area of the Chelsea Historic District that is contiguous with the Fulton Houses development site. Provide an action plan showing how buildings in this zone will be protected from construction impacts including vibration and increased flood risk from loss of permeable ground surface.

One of the greatest potential impacts on historic resources is their visual diminishment by incongruously large new neighbors. To aid in evaluation of this, provide photomontage street views of all project-adjacent streets and avenues from opposite compass points showing the full project frontages on both sides. For the Elliott-Chelsea alternatives: also provide views facing 437-459 West 24th Street from the far side of the opposite sidewalk; and facing north from the intersection of Tenth Avenue and West 24th Street. For the Fulton Houses alternatives: also provide views facing Cushman Row on West 20th Street from the far side of the opposite sidewalk; facing south from the intersection of Ninth Avenue and West 21st Street; and facing north from Ninth Avenue below West 15th Street capturing the Ninth Avenue frontages of Chelsea Market and 111 Eighth Avenue.

The DEIS also states all Elliott-Chelsea buildings are eligible for State and National Register of Historic Places (S/NR eligible). We ask to Include studies of how certain portions of that campus can be gut renovated and retained and provide contributions to project financing through use of Historic Preservation Tax Credits.