



March 3, 2024

Anthony Howard
Department of Housing Preservation
100 Gold Street, #7-A3
New York, NY 10038

Dear Mr. Howard,

Thank you for the opportunity to comment on the scope of the Fulton and Elliott-Chelsea redevelopment proposal.

We are appalled by the deplorable conditions at NYCHA Fulton Houses and Elliott-Chelsea Houses that our residents are forced to endure every day. The state of our public housing is nothing short of a crisis - with crumbling infrastructure, persistent mold growth, unreliable heating and plumbing systems, and a lack of basic security measures, our constituents are living in conditions that are not only unacceptable but also harmful to their health and well-being. Families, children, and seniors in our community deserve better than this neglect and indifference. Additionally, the buildings do not meet modern standards for living spaces, accessibility, energy efficiency, or resiliency. It is imperative that we take immediate action to address these pressing issues and ensure that our public housing residents have safe, clean, and habitable living environments. The proposed plan will address the deteriorating conditions at the two developments, while at the same time create 3,450 new homes with 875 of those homes being designated as permanently affordable. The time for change is now, and we are committed to delivering our constituents the quality of life that they deserve.

In 2019, elected officials joined NYCHA residents, local leaders, and nonprofit organizations to develop a plan to fund \$366 million in repairs on the campuses. The group proposed a plan in 2021 that included taking the campuses through the Permanent Affordability Commitment Together (PACT) conversion program. Developments selected to be PACT program will receive comprehensive renovations, enhanced property management, and expanded on-site social services. Through PACT, developments will be included in the federal Rental Assistance Demonstration (RAD) and convert to a more stable, federally funded program called Project-Based Section 8. This conversion will allow NYCHA to unlock funding to complete comprehensive repairs, while also ensuring homes remain permanently affordable and residents have the same basic rights as they possess in the public housing program. The PACT conversion

at Fulton and Chelsea-Elliott would include infill commercial and development, as well as several infill mixed-income residential buildings with 696 new apartments that would be affordability at levels ranging from 50%-165% Area Median Income (AMI).

In 2021, after receiving presentations from a number of potential development teams, NYCHA and its residents selected Essence Development and Related Companies as the development team that would complete this scope of work. In 2022 assessment by the development team revealed that capital repair needs were worse than anticipated, increasing the estimated cost beyond the cost of rebuilding all 2,050 apartments. Additionally, many residents expressed a desire to move into the new infill buildings that were to be constructed - an option that was not available to them under that plan.

Over the following months, NYCHA and the development team held 35 informational sessions with NYCHA residents to discuss its new assessment and a proposal for a phased replacement of NYCHA's 2,050 units in new buildings. Residents indicated in a survey that they were in favor of the proposal to replace the current buildings with new buildings that would provide all current residents with new homes. We stand united in support of our constituents and neighbors, the residents of NYCHA Fulton Houses and NYCHA Elliott-Chelsea Houses.

General Comments

The environmental assessment's current scope of work includes two proposals for the replacement of NYCHA's 2,050 units and the construction of mixed-income buildings on the campuses.

Community discussion of the project's scope at Community Board 4 meetings and at scoping hearings yielded meaningful feedback, such as the need to include rehabbing of current buildings, different AMI mixes, and senior-only housing in the scoping, among other suggestions. We ask that you give careful consideration to all the thoughtful comments submitted by the public, and Community Board 4 in particular.

Transparency regarding timing, community notification, affordability ranges, tenants' rights, project financing, and more, is critically important to residents and neighbors. NYCHA and the development team must be transparent, communicative and engaging throughout this process.

NYCHA's guarantee that any residents who are required to be temporarily relocated will have the right to return to their apartments is critical. We agree with Manhattan Community Board 4 on the importance of protecting NYCHA tenants' rights, including guaranteeing that seniors can choose between a studio or 1 bedroom should there be 'rightsizing' in the development, a guarantee that there will be no credit checks or background checks, ensuring that any fees or

other non-rent charges are higher than those for public housing, recognizing transfer fees already paid, clarifying the tailored grievance procedures for residents in PACT conversions, and notifying residents of lease changes so that they have an opportunity to comment prior to NYCHA issuing approval, among many others.

Design and Neighborhood Character

The Fulton Houses and Elliott-Chelsea Houses complexes were developed in the 1940s, 1950s and 1960s and are typical public housing buildings of that era, consisting of multi-story buildings arranged in large blocks and set back from the street. The surrounding neighborhood contains a variety of mixed-use and residential buildings and includes several historic districts, parks, and institutions such as schools and churches. We thank you for your early and ongoing engagement with NYCHA residents regarding the design and layouts of future buildings. It is critical that this engagement must also include the broader Chelsea community.

The buildings must be designed to integrate with the existing neighborhood fabric, including using similar materials and achieving similar street wall heights wherever possible. The buildings should be designed with street level retail, amenities, and community facilities that the current campuses are lacking. Street-level retail, which NYCHA's "towers in the park" model traditionally lacks, is essential for fostering vibrant street life by promoting human interaction, pedestrian activity, economic vitality, cultural expression, and a sense of place. Additionally, the design should incorporate widening of the sidewalks along the avenues, with the maximum amount of street trees that each block can accommodate. Healthcare facilities should be included in both campuses, especially given the impact of the impending closure of Mount Sinai Beth Israel hospital on the area and services available to new residents should be studied as well. NYCHA and the applicant development team must develop a plan to protect neighboring buildings, including landmarked historic buildings from potential construction impacts.

Construction Impacts

This project would construct and reconstruct approximately 5,450 units on six blocks in Chelsea, a dense mixed-use neighborhood on Manhattan's West Side. The proposed construction is anticipated to take more than five years, which will have potential impacts on neighboring blocks during the construction period. It may be disruptive for NYCHA residents who will remain in their homes during different phases of construction. When evaluating the project's construction impacts, the applicant should specifically assess the effects on residents, as well as on nearby P.S. 33. The applicant must mitigate all construction impacts, including noise, vibration, dust from demolition and excavation work, as well as from trucks and stationary equipment operating throughout the day. Heavy truck traffic and the temporary loss of on-street parking would affect not only residents, but also nearby businesses. We appreciate the early and ongoing engagement

with Hudson Guild, a critical resource to the local community, and look forward to a construction plan that keeps their services uninterrupted. Additionally, we recommend that the construction plan includes designated pick-up and drop-off zones for seniors utilizing services in the area.

Close coordination with community members will be important to minimize construction impacts to the maximum extent practicable over the years of work. The Applicant should, to the extent possible, use quieter equipment, especially for any late-night and early morning work, install temporary noise barriers such as sound curtains, and notify nearby residents and businesses of construction and equipment test times as well as any service disruptions. Additionally, residents would benefit from the restriction of loud activities like demolition, pile driving or heavy equipment operation to normal working hours on weekdays, when possible, and the routing of truck traffic away from sensitive receptors where feasible. The development team must establish a noise complaint protocol and quick response system to address any issues.

Open Space

Access to quality public open spaces and recreation areas promotes health, wellness and fosters community among residents. The preservation and enhancement of existing parks and playgrounds would improve quality of life for existing community members as well as new residents. The environmental assessment should include the impact of any change in the open space, not just on residents, but on the entire Chelsea community. The open space evaluation should distinguish between usable open space, such as plazas and playgrounds, and other spaces, and unusable open space, such as lawns that are fenced off and not accessible to residents or the public. Any change in open space should come with a study of the impacts of replacing open space with heat absorbing materials, and the impact of tree loss on carbon absorption. In order to mitigate construction impacts to open space in the developments, the applicant should make every effort to maintain access to some open spaces and commit to providing temporary open spaces that are planned in consultation with the community.

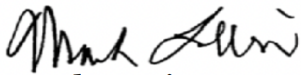
Solid Waste and Water

The environmental study should evaluate increased recycling and the use of composting at the site. Modern waste management systems for residential buildings should be considered, including automated waste sorting systems, pneumatic tubes, underground waste collection systems that minimize visual and olfactory impacts, and composting facilities for organic waste, all aimed at improving efficiency, reducing environmental impact, and promoting sustainability. Loading docks for waste should be studied to streamline the waste collection processes, featuring designated areas equipped with compactors or containers for efficient disposal, aimed at ensuring cleanliness and reducing congestion in surrounding areas. Additionally, a project of this scale will have impacts to our water system, which should be evaluated during this process.

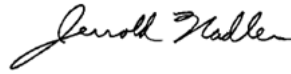
Hazardous Materials

Noise, vibration, and dust generated from demolition, excavation, and on-site construction activities should be carefully considered. Care must be taken when disturbing existing buildings and or soil during excavation. If testing determines that hazardous materials are present at the site, several mitigation efforts should be implemented. Air monitoring equipment should be installed both upwind and downwind of the site to continuously check that hazardous materials are not becoming airborne above safe limits. If airborne levels approach thresholds that are cause for concern, work should stop immediately, and additional controls should be put in place before allowing the work to resume. All contaminated soil, building materials or debris removed from the site should be properly contained, transported, and disposed of at an appropriate facility and nearby residents should be informed about any necessary remediation activities taking place and necessary safety measures.

As this process continues, we look forward to transparency from the lead agencies, consultants, and the development team. This project's success will only be possible with input from NYCHA residents, community members, and local leaders. The residents and neighborhood stakeholders have invaluable understanding of both the existing needs and long-term vision for these housing sites. Their perspectives, priorities, and concerns should help shape this development. We look forward to partnering with you on a thorough, collaborative effort to complete this proposed development.



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