

July 24, 2017

**Public Notice Regarding Section 106 Review of
Proposed Affordable Senior Housing Project at 6309 4th Avenue, Brooklyn NY
Seeking Public Comment**

The City of New York-Department of Housing Preservation and Development (HPD) is issuing this public notice as a part of its responsibilities under 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act of 1966 (Section 106), as amended.

Federal assistance from the U.S. Department of Housing and Urban Development (HUD), administered by HPD, is being sought to facilitate new construction and adaptive re-use intended to provide affordable senior housing (the “proposed project”) at 6309 4th Avenue (Brooklyn Block 5809, Lots 7, 10, and 11), an approximately 14,000 gross-square-foot (gsf) assemblage of privately owned property located in the Sunset Park neighborhood of Brooklyn (the “project site”). The project sponsor, Fifth Avenue Committee (FAC), would be the recipient of the federal assistance through HPD. The project site contains the former Zion Norwegian Lutheran Church (the “church”), located at 6301-6305 4th Avenue; and associated former Parish Center (the “educational building”) to the south, located at 6307-6311 4th Avenue. Both the church and associated educational building are located on Lot 7 of Block 5809. The church is a contributing historic building within the Sunset Park Historic District, which is listed in the State and National Registers of Historic Places (S/NR). The associated educational building on the same lot is not located within the boundaries of the Sunset Park Historic District, and has been determined not eligible for listing in the S/NR. Lots 10 and 11, which are also a part of the project site and located immediately east of Lot 7 at 414 and 416 63rd Street, respectively, contain existing two-story residential townhouses (the “townhouses”) which are also located within the boundaries of the S/NR-listed Sunset Park Historic District and are also considered contributing buildings.

The project sponsor’s current proposal involves the demolition of the church and associated educational building currently on Lot 7 to construct a new eight- to nine-story building (the “new building”) containing senior housing and community facility space in the form of a Universal Pre-Kindergarten (UPK) school. The UPK space would be programmed and constructed by the New York City School Construction Authority (SCA) pursuant to applicable agreements with the SCA and the project sponsor. The New York City Department of Education would operate the UPK facility once completed. The new building would be integrated with the existing townhouses to the east (current Lots 10 and 11), which would be adaptively re-used to accommodate additional senior housing units. The overall project (the new building and adaptively re-used townhouses) would accommodate approximately 84 units of affordable senior housing and the approximately 15,000 gsf UPK. Approximately eight of the total 84 units would be accommodated within the adaptively re-used townhouses along 63rd Street, with the remaining 76 units and UPK space located within the new building along 4th Avenue.

The NYCLPC and the New York State Office of Parks, Recreation and Historic Preservation (OPRHP), acting as the State Historic Preservation Office (SHPO), were consulted in connection with the preparation of the environmental reviews currently underway pursuant to New York’s City Environmental Quality Review (CEQR) and HUD’s requirements at 24 CFR Part 58. Through this consultation it was determined that the project site is located within the boundaries of the S/NR-listed Sunset Park Historic District. Furthermore, it was determined that the church and two townhouses on the project site are contributing buildings within the S/NR-listed Sunset Park Historic District.

Neither NYCLPC nor SHPO had archaeological concerns with the project site. In addition, NYCLPC indicated they had no interest in the Zion Lutheran Church or the townhouses at 414 and 416 63rd Street.

The project site and portions of the surrounding S/NR-listed Sunset Park Historic District would be affected by the proposed undertaking. Both the demolition of the church to facilitate new construction,

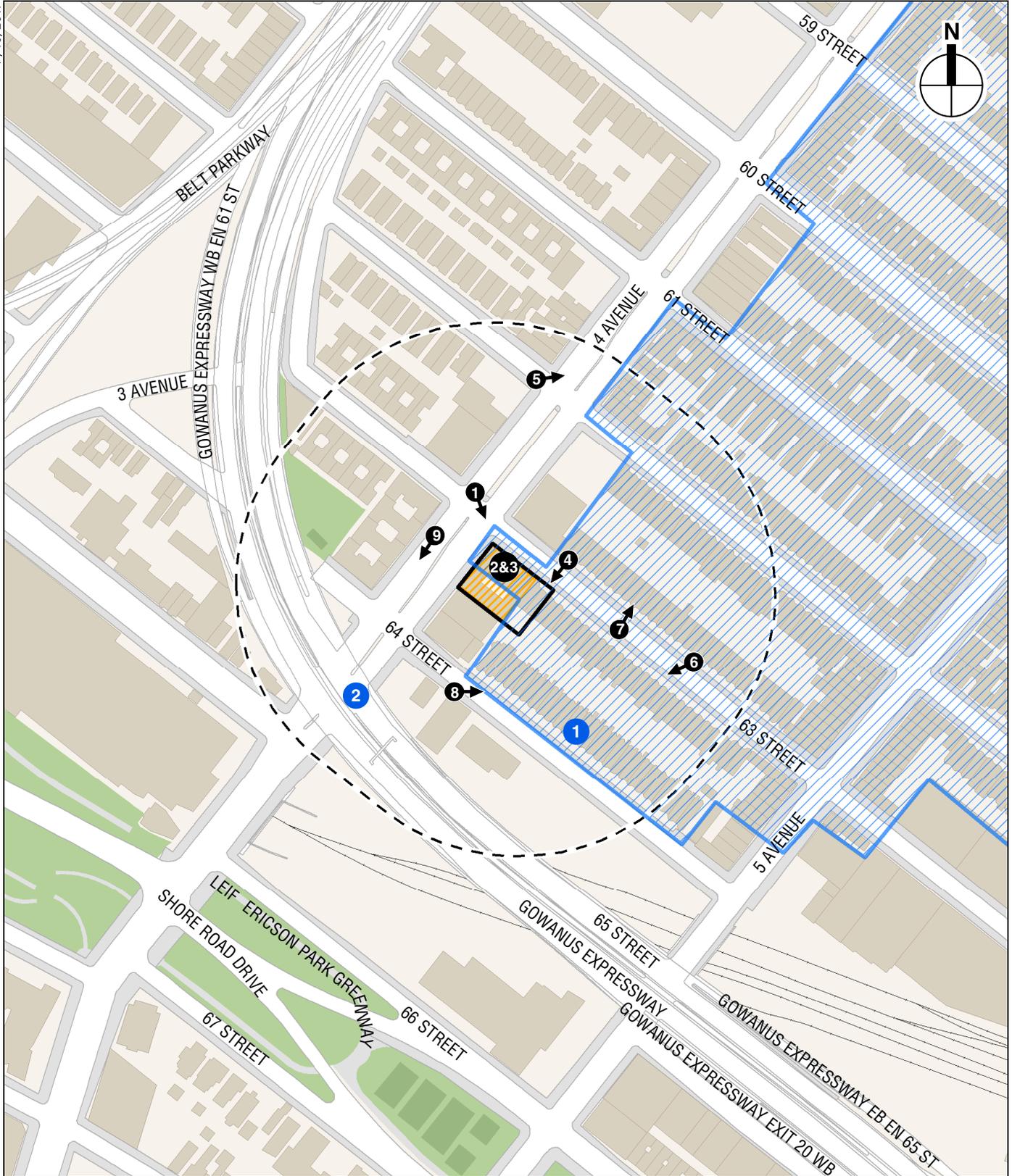
and the adaptive re-use of the townhouses would result in a direct effect to a historic resource. Furthermore, ground-borne vibration associated with demolition and construction activities at the project site has the potential to result in effects to the townhouses proposed for adaptive re-use as well as nearby buildings located within the historic district.

HPD, in consultation with SHPO (and concurrence from NYCLPC), has determined that the proposed project would constitute an adverse effect on historic properties under Section 106. This determination is based on the information provided above as well as SHPO's review of an Alternatives Analysis, which concluded there were no feasible alternatives that would meet the goals and objectives of the project as currently proposed. Section 106 and the regulations at 36 CFR Part 800 require HPD, as the funding agency, to assess any potential direct or indirect effects the proposed new construction would have on identified cultural resources and to seek ways to avoid, minimize, or mitigate any adverse effects. The Section 106 consultation process would conclude following the execution of a Memorandum of Agreement (MOA) between HPD, SHPO, and the project sponsor which would contain agreed upon measures to address the potential adverse effects. Anticipated stipulations of the MOA, as have been agreed upon with SHPO include:

- Documentation of building conditions prior to the proposed demolition of the church. As agreed upon with SHPO, this recordation package would include a historical narrative and architectural description of the church, digital photography of the exterior and interior of the church and townhouses, and any existing drawings of the church;
- Preparation of a Construction Protection Plan (CPP) pursuant to the requirements of the New York City Department of Buildings (NYCDOB) Technical Policy Procedure Notice #10/88 concerning procedures for avoidance of damage to historic structures resulting from adjacent demolition, new construction, and rehabilitation;
- Disassembly, salvage, and reuse of elements currently part of the church to be demolished, dependent upon the financial and practical feasibility of their removal and reuse, for incorporation as on-site historical interpretive displays within the landscape and/or new building; and
- Continued consultation with SHPO as the proposed project's design advances with respect to the adaptive reuse of the townhouses at 414 and 416 63rd Street.

Execution of the MOA would be required prior to the release of funds and start of construction at the project site. In order to ensure that the undertaking is carried out in accordance with the executed MOA, the applicable funding agreement(s) between HPD and the project sponsor will require the sponsor to comply with the all stipulations outlined in the executed MOA.

Information related to the proposed project and HPD/SHPO's determination of an Adverse Effect may be viewed online at <http://www1.nyc.gov/site/hpd/developers/environmental-review.page> under the heading "Compliance with Section 106 of the National Historic Preservation Act of 1966" toward the bottom of the webpage. Members of the public are encouraged to provide views on how the project may affect historic properties and ways that these effects may be avoided, minimized, or mitigated. Comments may be submitted by email to nepa_env@hpd.nyc.gov for an 18-day period beginning on July 24, 2017.



-  Project Site
-  Development Site
-  Study Area (400-foot boundary)
-  Photograph Reference and View Direction

-  Sunset Park Historic District (S/NR)
-  Gowanus Expressway (S/NR-eligible)

0 200 FEET





Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

November 04, 2015

Mr. Jay Marcus
Director of Housing Development
Fifth Avenue Committee
621 Degraw Street
Brooklyn, NY 11217

Re: HTF
FAC 6309 Fourth Avenue
6309 4th Avenue, Brooklyn, NY 11220
15PR06394

Dear Mr. Marcus:

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

We note that the former Zion Norwegian Lutheran Church, located at 6301-6305 4th Avenue, is a contributing historic building within the Sunset Park Historic District, which is listed in the State and National Registers of Historic Places. We also note that the adjacent building to the south, located at 6307-6311 4th Avenue, is not located within the boundaries of the Sunset Park Historic District, and has been determined not eligible for listing in the State and National Registers of Historic Places.

We have reviewed the project description that was submitted to our office on November 2nd, and we understand that the project proposes to demolish the former historic church and adjacent building to the south for a mixed-use redevelopment of the site. Under the provisions of Section 106, demolition of an historic property is deemed an Adverse Effect. This finding triggers an exploration of prudent and feasible alternatives that might avoid or reduce the project effects. As a matter of policy and practice, this exploration must occur before mitigation measures can be developed and before demolition can occur. If no prudent and feasible alternatives are identified in the analysis, we would enter into a formal agreement document, which would identify proper mitigation measures to be incorporated into the work.

Please note that the former Zion Norwegian Lutheran Church is eligible for the Federal and State Historic Rehabilitation Tax Credit Programs. These programs enable developers of

Division for Historic Preservation

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historic properties to earn a tax credit equal to as much as 40% of the certified rehabilitation expenditures. Eligible costs include all hard and soft costs attributed to the rehabilitation of the historic property and can be used in conjunction with other tax credit programs. The potential 40% credit is a combination of 20% from the Federal Program and 20% from the New York State Program. See the attached documentation for more information on the New York State Program. Information regarding the Federal program can be found at <http://www.nps.gov/tps/tax-incentives/before-you-apply.htm> Please note that to receive the state credits, you must first be approved for the federal program; please investigate this program's requirements first.

In order to continue our review, at this time we request that you please submit the following:

1. Analysis of prudent and feasible alternatives to demolition of the church

We would appreciate the requested information be provided via our Cultural Resource Information System (CRIS) at www.nysparks.com/shpo/online-tools/ Once on the CRIS site, you can log in as a guest and choose "submit" at the very top menu. Next choose "submit new information for an existing project". You will need this project number and your e-mail address.

If you have any questions, I can be reached at (518) 268-2182.

Sincerely,



Olivia Brazee
Historic Preservation Technical Specialist

via e-mail only



Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

November 29, 2016

Ms. Heather Spitzberg
38-40 State Street
Albany, NY 12207

Re: HTF
FAC 6309 Fourth Avenue; Zion Lutheran Church
6309 4th Avenue, Brooklyn, NY 11217
15PR06394

Dear Ms. Spitzberg:

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

We have reviewed the Alternatives Analysis report that was provided to our office on November 23rd, 2016. We understand the stringent parameters of this particular project, and we agree that any attempt to fit a new residential program within the historic church would greatly compromise the building's historic integrity. Based upon our review, we concur with your determination that there are no prudent and feasible alternatives to full demolition of the historic church building and gutting of the two row house interiors.

At this time, we suggest drafting a formal Memorandum of Agreement (MOA) which would identify proper mitigation measures to be incorporated into the work. Mitigation measures could include documentation, salvage of certain building components, on-site interpretive displays, and continued consultation with our office as the project design develops, in particular with regard to the row houses at 414 and 416 63rd Street. We recommend focusing on possible mitigation items that would be appropriate for the row houses, given that these historic structures will remain substantially intact and will continue to convey the historic character of the neighborhood.

We would appreciate if the requested information could be provided via our Cultural Resource Information System (CRIS) at www.nysparks.com/shpo/online-tools/ Once on the CRIS site, you can log in as a guest and choose "submit" at the very top menu. Next choose "submit new information for an existing project". You will need this project number and your e-mail address. If you have any questions, I can be reached at (518) 268-2182.

Sincerely,

Olivia Brazee
Historic Preservation Technical Specialist

olivia.brazee@parks.ny.gov

Division for Historic Preservation

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**Fifth Avenue Committee-Universal Pre-K and Affordable Housing
6309 Fourth Avenue
Sunset Park, Brooklyn, NY
15PR06394**

Alternatives Analysis

November 22, 2016

A. INTRODUCTION

The Fifth Avenue Committee (FAC) the “applicant”) proposes to redevelop the site of the former Zion Lutheran Church and adjacent educational building at 6309 Fourth Avenue in the Sunset Park neighborhood of Brooklyn, NY with a 15,000 gross-square-foot (gsf) Universal Pre-Kindergarten (Pre-K) school and 74 units of affordable senior housing (see **Figure 1**). Nine additional units of affordable senior housing would be located in two existing adjacent brownstones at 414 and 416 63rd Street, for a total of 83 units. The project had initially envisioned that the two townhouses at 414 and 416 63rd Street could provide five units of housing for low income families with an additional super’s unit, creating an intergenerational development. However, a number of factors have necessitated that affordable senior units also be created at the townhouses, as described in greater detail below.

FAC is a nationally-recognized non-profit community organization in South Brooklyn formed in 1978 that develops and manages affordable housing and community facilities, creates economic opportunities and ensures access to economic stability, organizes residents and workers, offers student-centered adult education, and combats displacement caused by gentrification. The Zion Lutheran Church and 414 and 416 63rd Street are located within the boundaries of the Sunset Park Historic District, listed on the State/National Register of Historic Places. As the project proposes to demolish the Zion Lutheran Church and construct a new Universal Pre-K school and affordable housing on the site, the proposed project would have an Adverse Effect pursuant to Section 106 of the National Historic Preservation Act. In a letter dated November 4, 2015, SHPO requested an in-depth exploration of alternatives to the demolition of Zion Lutheran Church.

This Alternatives Analysis provides information regarding the current status and history of the church as it affects its continued use as a church and adaptive reuse, and presents an analysis of alternatives to demolition that have been considered. As presented below, the applicant has explored all prudent and feasible alternatives to the demolition of the church to avoid the Adverse Effect, and has determined it is not feasible to retain, adaptively reuse, or incorporate the church into the proposed project. In addition, information is also provided in this document regarding the proposed adaptive reuse of the two townhouses at 414 and 416 63rd Street and the alterations that would be required to convert them to affordable senior housing.

B. HISTORY

ORIGINAL CONSTRUCTION AND USE

The Zion Lutheran Church was one of a number of churches built in the Sunset Park Historic District. While much of the rowhouse development in the historic district occurred in the last two decades of the 19th century and first decade of the 20th century, the church was built as part

of a second wave of development that included additional infill residential buildings and public, institutional, and religious buildings that occurred up through the early 1930s.

The Zion Lutheran Church was founded in 1908 within the Norwegian Synod, and was built as the Zion Norwegian Lutheran Church in two stages: the basement in 1910 and the main church including the sanctuary in 1920. The church was designed in the neo-Italian Renaissance style by Carl L. Otto.

The church, originally part of the Bay Ridge neighborhood (the Sunset Park neighborhood was renamed in the 1960s after a local park, Sunset Park), served a Norwegian population that had settled in the area along with Polish and Finish immigrants in the 1880s and 1890s. By the 1930s, the church had a congregation of over 1,000.

However, the Depression, removal of the Third Avenue elevated line, and the construction and widening of the Gowanus Expressway in the early 1940s (which resulted in dividing the neighborhood), precipitated a decline of the neighborhood. In addition, following World War II, many white residents left for the suburbs and the area lost significant employment facilities in the 1950s through the 1970s through the relocating of the maritime industry to New Jersey and deactivation of the Brooklyn Army Terminal. According to *The Promise Fulfilled: A Portrait of Norwegian Americans Today*, the loss of church members at the Zion Norwegian Lutheran Church commenced with the “great exodus to the suburbs following World War II” and “was an inevitable development as Hispanic and Asian populations, Greek and Middle-Eastern migrants, and more recently, large Russian contingents, moved into the old Norwegian neighborhoods as the Norwegians moved elsewhere.”¹

RECENT HISTORY AND RFP FOR REDEVELOPMENT

By the 1980s, Sunset Park had become settled primarily by immigrants from Latin America, China and other Asian countries and the area saw a revitalization through the new population, as well as conversion of the Brooklyn Army Terminal and Bush Terminal for light industrial and industrial uses.

By 1995, Zion Lutheran Church had only about 30 congregants at attendance for church services, consisting primarily an aging congregation, and had waited too long to try to attract a non-Norwegian membership.² In January 2014, the church held its last service, and became one of several churches in southwest Brooklyn to close its doors, including the Fort Hamilton Presbyterian Church, Salem Lutheran Church, Bay Ridge United Methodist Church, and Salam Arabic Lutheran Church, which all closed between 2009 and 2011 as a result of financial difficulties and reduced congregations.

In 2014, the Metropolitan New York Synod for the Evangelical Lutheran Church of America, (the “Metropolitan New York Synod”) issued a Request for Proposals (RFP) for the sale and redevelopment of the closed Zion Lutheran Church, attached Parish House on Fourth Avenue, and the two townhouses at 414 and 416 63rd Street. The RFP required that any new development include a 15,000 gsf medical clinic to be built and leased or sold as a condominium

¹ Odd, Sverre Lovoll. *The Promise Fulfilled: A Portrait of Norwegian Americans Today*. University of Minnesota Press, 1998, p. 100.

² Ibid.

to NYU Lutheran Medical Center and that the remainder of the building to be used to provide affordable housing to service the community. FAC responded to the RFP and was selected as the developer. The Metropolitan New York Synod subsequently decided against leasing to a health clinic and requested that the tenant be the School Construction Authority (SCA).

C. EXISTING CONDITIONS

ZION LUTHERAN CHURCH

Zion Lutheran Church, included within the boundaries of the S/NR listed Sunset Park Historic District, is at the southeast corner of Fourth Avenue and 63rd Street. The church is clad in brick with three pointed arch entrances along Fourth Avenue that are set in a stone enframingent with a decorative frieze above the central opening (see **Figure 2**). A decorative “rose window” (without stained glass) is above the main entrance, centered at the clerestory gable. The church contains a basement level that contains a large multi-purpose room; sets of stairs provide access from the ground floor (street level) lobby down to the multi-purpose room (see **Figure 3**). The sanctuary and a few adjacent smaller rooms are at the second floor. While access to the church is provided from Fourth Avenue at street level, this access only leads to a narrow lobby/hallway that extends north-south along Fourth Avenue (see **Figure 4**). The lobby has a tiled floor. The lobby provides access to the basement level multi-purpose room, which is approximately 5.5 feet lower than the lobby/street level, via a landing with a set of stairs at each end (see **Figure 3, Photograph 4**) on the east side of the lobby. Wood stairs with vinyl covered treads and risers are at the north and south ends of the lobby/hallway and provide access to a second floor lobby/hallway (see **Figure 5**). This lobby/hallway provides access to the sanctuary, also at the second floor level, via two sets of paired wood doors.

The flooring of the second floor lobby is of vinyl (see **Figure 5**). The sanctuary, a single double-height space, is oriented east-west, with the altar at the east end, featuring a mural (believed to be painted directly on the plaster wall) (see **Figure 6, Photograph 9**). A balcony with a pipe organ is at the west end of the sanctuary (see **Figure 6, Photograph 10**). The sanctuary contains two rows of pews with a center aisle. There are four arched stained glass windows on each of the north and south facades of the sanctuary. A clerestory also has north and south facing stained glass windows (see **Figure 7**). A doorway at the south end of the east wall of the sanctuary gives access to a corridor with a number of small rooms located behind the sanctuary to the east. A doorway at the north end of the east wall of the sanctuary provides access into the church’s tower, located at the east end of the building on 63rd Street (see **Figure 2, Photograph 1**). The tower extends above the roof of the church with a hipped roof, capped by a crucifix. The belfry, originally designed as an open air structure with arched openings on all four sides, has had these arched openings infilled with wood doors to which are applied electrified crucifixes. The interior of the tower contains a flight of wood stairs that leads to a ladder that gives access to the upper, formerly open air portion of the tower (see **Figure 8**).

From the second story lobby, stairs with vinyl treads and risers provide access up to the balcony (see **Figure 5, Photograph 8** and **Figure 9, Photograph 15**). An arched stained glass window is located at the landing of the north stairs between the second floor and the balcony. It is likely a similar stained glass window was located on the landing of the south staircase, but this window has been removed with the exterior façade at this location finished in plain stucco (see **Figure 2, Photograph 2**).

PARISH CENTER

The former Parish Center (the “educational building”), south of the church on Fourth Avenue, is a two-story plainly designed brick building that is connected to the church via a one-story, glazed connector (see **Figure 2, Photograph 2** and **Figure 9, Photograph 16**). The educational building also does not have an on-grade first floor or an elevator. It and the connector to the church are located outside the boundaries of the Sunset Park Historic District and are not architecturally or historically significant, as also indicated in SHPO’s letter of November 4, 2015.³ Therefore, their demolition would not constitute an adverse effect on historic resources.

414 AND 416 63RD STREET

The two townhouses east of the Zion Lutheran Church at 414 and 416 63rd Street would be adaptively reused to contain 9 affordable senior housing units. As described above, the project had initially proposed to redevelop the two townhouses with housing for low income families. However, the acquisition cost of the townhouses in comparison with the number of units that could be generated (five plus a super’s unit) precluded the ability to finance the townhouses separately from the senior housing. In addition, the New York City Department of Housing Preservation and Development (HPD) and New York State Homes and Community Renewal (HCR), which are anticipated to provide funding for the project, expressed concerns with respect to whether the intergenerational housing could be funded under certain programs and whether there were fair housing issues with not providing 100% affordable senior units.

Photographs keyed to schematic floor plans of the townhouses were provided to SHPO on November 17, 2015 as noted in OPRHP’s letter of November 4, 2015⁴ (see **Appendix A**). The townhouses were designed as two-unit dwellings with what is assumed to be a supers unit in the basement. **Appendix B** contains more detailed current floor plans and also elevations of the two buildings. The townhouses have been altered through the removal/covering of original floor, wall and ceiling finishes and removal of partition walls. Removal of partitions include the removal of the walls separating the former corridor and adjacent rooms on the ground floor for the full length of 414 63rd Street, the sealing up with brick of the main (parlor level) entrance and removal of original paired wood doors and installation of a modern single door at 414 63rd Street, and removal of partition walls at the rear of 414 63rd Street on the ground floor to create one large room. These alterations likely occurred when the church acquired the townhouses. The first two floors (ground and parlor levels) of 414 63rd Street were used by the church for accessory uses such as a teen recreation space up until the church closed. Connections were also made from 414 63rd Street to the church at a variety of different locations on the ground and stoop/parlor level floors. Currently the caretaker of the church and family live in the building. 416 63rd Street has also had original wall, ceiling and floor finishes covered and replaced and is overall in poor condition, including the collapse of plaster ceilings at the parlor level that has required the additional bracing of the lathe above (see **Appendix A, Photograph 13**). This building was formerly occupied by the church’s pastor but is now vacant. Some original wood doorway moldings, staircase banisters, and pressed-metal ceilings are extant in the buildings and these are not unusual but rather are typical of the time period in form and detail.

³ This letter may be misdated as it references a previous letter dated November 4, 2015 and a submission of November 17, 2015.

⁴ Same as note above.

D. PROJECT PURPOSE AND NEED

FAC's proposal responds to the Lutheran Synod's request for a 15,000 gsf school facility and affordable housing for the community. The project proposes 83 units of affordable senior housing. The proposed housing would include studio and one-bedroom units to serve the needs for deeply affordable housing for very and extremely low income senior citizens (identified as age 62+). Of the total units, there would be set asides for formerly homeless seniors, units that would be reserved for those with physical disabilities, and units that would serve those with sensory disabilities. The project would serve households with a range of incomes – from 30% Area Median Income (AMI) up to 80% AMI.

Brooklyn Community Board 7 has identified affordable housing as a priority need, especially as residents are increasingly rent burdened, earn less than the city's median household income, and live at a poverty rate that is higher than the city average. Overcrowding and illegal subdividing of apartments is prominent and is an issue the district seeks to address. There is no public housing in the neighborhood and market rate rents in the area, averaging \$1,775 for a studio apartment and \$2,000 for a one bedroom, are well above affordable levels, particularly for the senior population, a majority of whom are extremely low income (earning less than 30% AMI) in Sunset Park. A majority of the renter households in Sunset Park earn less than 80% AMI. In over 15 years, no new affordable housing opportunities have been developed in Sunset Park for families and one site for apartments has been developed for seniors. The housing section of Community Board 7's 197-a Plan identified Fourth Avenue as a major area for any future affordable housing development.

The proposed project would provide much-needed affordable housing, most specifically for seniors, who are at greatest risk of being displaced from the neighborhood by rising rents as the neighborhood gentrifies. Sunset Park has a scarcity of rent-stabilized housing, with much of the housing located in two- to four-family walkup buildings, which is not accessible to the mobility impaired. The affordable senior housing would meet the goals and objectives of the Metropolitan New York Synod to utilize the property in line with its community service mission. To ensure neighborhood residents are aware of the new housing opportunity, FAC has visited local senior centers in Sunset Park and Bay Ridge to train staffers on how interested residents may apply for the new housing. The New York City Department of Homeless Services (or a designated DHS agency) will provide tenant referrals for the formerly homeless and the Center for the Independence of the Disabled, New York (CIDNY) and the Lexington Center for the Deaf will provide tenant referrals and supportive services for the disabled populations.

The proposed approximately 15,000 gsf Universal Pre-K school would serve a growing need for school seats in the Sunset Park community. Although demand fluctuates throughout the year, NYC Department of Education officials have indicated that there is currently an unmet need of 350 Pre-K seats. The proposed project would address this need by providing approximately 72 seats in 4 classrooms.

To enable construction of the project, FAC 6309 Fourth Avenue LP will purchase the site of the church and educational building as well as the two townhouses at 414 and 416 63rd Street.

E. ALTERNATIVES ANALYSIS

ZION LUTHERAN CHURCH

As the Zion Lutheran Church is located within the boundaries of the S/NR listed Sunset Park Historic District, the applicant has considered several options to utilize the site, including options which would avoid impacts on the existing structure and alternatives that would minimize impacts on the church. These include: 1) adaptively reusing the existing church and constructing a new connecting building in the area of the adjacent non-historic educational building to the south to provide the Universal Pre-K and affordable senior housing; 2) retaining a portion of the existing church and otherwise removing the majority of the church and constructing a new building to house the Universal Pre-K and affordable senior housing in its place; and 3) removing the church and constructing a new building to house the Universal Pre-K and affordable senior housing.

The following analysis concludes it is not feasible to retain and reuse all or a portion of the Zion Lutheran Church as part of the proposed Pre-K and affordable senior housing project, and there is no feasible alternative to its demolition. This analysis is described below.

ALTERNATIVE 1: REUSE THE CHURCH AND EXPAND ON SITE FOR AFFORDABLE SENIOR HOUSING AND UNIVERSAL PRE-K USE

The church contains approximately 14,527 gsf. The adjacent educational building contains approximately 12,160 gsf. As the educational building is not historic, the feasibility of reusing the church either for affordable senior housing or the Universal Pre-K and constructing a new building of a larger size that conforms with zoning in place of the educational building was explored.

Adaptive reuse of the church could yield 10 affordable units for seniors. Six, including five studios and one one-bedroom, could be developed on the existing second floor of the church (see Drawing A4 in **Appendix C**). Four additional units—two studios and two one bedrooms—could be developed in a newly created third floor that would be built within the sanctuary space (see Drawing A5 in **Appendix C**). The stained glass windows would need to be removed and replaced with operable windows with clear glazing. To additionally meet light and air requirements, new windows would have to be inserted on the primary Fourth Avenue and 63rd Street facades (see Drawings A4 and A5 in **Appendix C**). These would include three new windows to be spaced across the Fourth Avenue façade and three new windows to be built adjacent to existing arched windows at the second story level. At the new third story level, one new window would need to be constructed beneath the “rose window” on the Fourth Avenue façade and five new dormer windows to need to be built on the 63rd Street façade at the new third story level and one dormer on the south facade. The dormer windows, by nature of their construction, place the light source farther away from the main living space of the apartments, and would result in dark apartments for those units along 63rd Street, with light further diminished by the north-facing orientation.

Though evaluated to maximize unit count, it would not be feasible to construct yet another floor, a fourth floor, within the church building due to the height of the bottom of the existing roof trusses and the need for the floor of the new third floor to be high enough to allow residents to see out of the new dormer windows that would need to be added along 63rd Street to provide light and air to the apartments. The cost of the renovations to the church to create only 10 units

would render the project financially infeasible. In addition, no programs would be likely to fund such a small number of units.

Further, the removal of the stained glass windows, insertion of the new windows and dormers, in addition to the substantial alterations that would be required to add an additional floor, repartition and renovate the church building for use as affordable housing, and to meet building code and ADA accessibility requirements would result in significant modifications to the building that would remove original building fabric and substantially alter the design and appearance of the church, adversely affecting this historic property.

Under existing zoning, a new nine-story building with approximately 31,375 gsf and with a rear yard in compliance with zoning could be built in place of the educational building. As the viability of the project depends on the number of units that can be generated and the amount of funding that can be secured for the project, the applicant explored maximizing the number of affordable senior housing units that could be built on the site, while maintaining the church and providing some space for the Pre-K school. The new building would allow for only 30 units of affordable housing for seniors, including 20 studios and 10 one bedroom units; the one bedroom units allow for a care giver to be present as well. In the maximum unit combination, there would be 10 affordable housing units in the church plus the 30 units in the new building, which would result in a maximum unit count of 40. The nine affordable senior units that would be included in 414 and 416 63rd Street would result in a grand total of 49 units under this reuse scenario.

Hypothetically, a very limited Pre-K school of 7,074 gsf could be provided in the combined basement area of the church (the existing multi-purpose room) and the new building (see **Appendix C**). This constitutes a limited amount of space in consideration of SCA's requirements for a Universal Pre-K Facility and is less than requested by the Metropolitan New York Synod. SCA requires a minimum of 30 sf net/child for classrooms, and associated required lobby, Nurse's office, Administrative offices, kitchen, bathroom facilities, and storage and custodial spaces. The basement level would pose accessibility issues as it is at a lower level than the church's street level lobby by approximately 5.5 feet. In addition, the windows are placed high in the wall, which is not ideal for a school facility.

If the 14,527 gsf church were to be adapted entirely for the Universal Pre-K school, partitioning of the sanctuary, removal of architectural features, providing new means of vertical and ADA compliant circulation, and additional means of ventilation would be required. There would likely be further issues in utilizing the sanctuary space for a school as, for instance, the stained glass windows in the sanctuary include religious iconography. The 10 potential units of affordable senior housing in the church would also be lost under this scenario.

As shown in **Table 1** below, a project with a 7,074 gsf Universal Pre-K and the maximum number of affordable units that could be developed—49 units including 30 in the new building, 10 in the church, and 9 at the townhouses, would have a funding gap of \$9,446,766 when compared with a development of 83 units, including 74 units in a new building in the location of the church and education building plus the nine units at 414 and 416 63rd Street.

Table 1:		
Proposed Project (Feasible Alternative) and Alternative 1		
	Proposed (Feasible Project)	Alternative 1: Reuse Church & Expand On Site
New Construction Units	74	30
Adaptive Reuse Units (Church)	0	10
Townhouse Units	9	
Total Units	83	49
Projected Budget		
Acquisition Cost	\$5,152,052	\$5,152,052
Construction Cost*	\$29,533,089	\$24,314,478
Soft Cost	\$5,698,703	\$4,916,676
Developer's Fee	\$5,165,127	\$4,468,029
Total Development Cost	\$45,548,971	\$38,851,235
Permanent Funding Sources		
Purchase price donated back	\$3,452,052	\$3,452,052
NYC HPD SARA	\$8,395,000	\$4,600,000
Permanent Mortgage	\$8,599,252	\$3,983,773
Borough President Res A	\$1,000,000	\$1,000,000
LIHC Equity	\$16,443,356	\$10,206,979
FAC Equity	\$1,300,898	\$526,012
SLIHC Equity	\$4,759,524	\$5,099,490
Deferred Developer's Fee	\$1,598,889	\$536,163
Total Funding Sources	\$45,548,971	\$29,404,469
Funding Gap	\$0	\$9,446,766
<p>Note:* Hard costs assumptions in the proposed project scenario are based on estimates from the general contractor (GC) for a new construction project that is subject to prevailing wage. Preliminary schematic drawings of the adaptive reuse scenario do not provide the GC with enough detail to accurately estimate the costs of building a new structure within the historic envelope of the church. In projecting the budget for the adaptive reuse scenario, the developer has assumed a 10% inflation of hard costs. This a very conservative estimate of the construction costs and most likely understates the actual costs of converting the historic structure to residential use.</p>		

A vertical expansion of the church to generate additional units was also considered. However, a vertical expansion would be cost prohibitive, extremely challenging from a structural engineering expensive if not impossible, and would ultimately completely destroy the historic character of the church building.

Therefore, the alternative of retaining and adaptively reusing the church and constructing a new adjacent building allowable under zoning to house affordable senior housing units and the Universal Pre-K school is not feasible.

ALTERNATIVE 2: RETAIN A PORTION OF THE CHURCH AND CONSTRUCT A NEW BUILDING FOR AFFORDABLE SENIOR HOUSING AND UNIVERSAL PRE-K USE

As it is not feasible to retain the church in its entirety to try to avoid the adverse impact, the applicant evaluated whether measures to minimize the impact could be implemented. This consisted of an evaluation of whether it would be possible to retain a portion of the church and still develop a project on the site of the church and educational building that contains the necessary 74 units (plus the nine units in the townhouses) to be financially viable.

- Alternative 2a: Retain Church Facades

Under this scenario, the existing educational building would be demolished and the floors and rear walls of the church building would be removed, leaving only all or portions of the street facades. A new building would be constructed in compliance with the existing zoning.

Additional substantial costs would be incurred through the need to carefully demolish the remaining non-primary façade portions of the existing church; to brace and stabilize the historic facades; to underpin and protect the facades during construction; to remove and store the stained glass windows during construction; and to build a new building with the church walls standing on the site and incorporated into the new design, in itself a significant engineering challenge that could further affect the structure and design of the new building and dramatically increase the cost of the new construction.

Any retention of the historic facades would also result in a loss of usable residential space if the new building were to set back from the facades of the church, and if consideration was given to work within the confines of the existing limited fenestration to minimize alterations to the historic facades. A reduction in unit count from the 74 units required in the new building to have a viable project coupled with increased construction costs would render this alternative infeasible. Furthermore, any scenario where the church walls are retained and incorporated into a new much taller building would so alter the character of the facades and original feeling of the gable roof church building as to be negate any preservation value.

- Alternative 2b: Retain the Church Tower

Substantial consideration was also given to retaining the church tower, located at the east end of the church on 63rd Street and constructing a new building on the remainder of the site of the church and educational building. An analysis conducted by GACE Consulting Engineers identified the following issues and constraints with retaining the tower:

- The tower is integral with the rest of church structure and the south and west walls of the tower do not extend all the way down to the foundation. Multiple existing structural transfers would need to be respected and it would be difficult to determine where the cut-off should occur to remove the church, so as to avoid impacting the integrity of existing tower superstructure and foundations.
- It appears that a portion of the existing north exterior wall of the church adjacent to the northwest corner of the tower, together with the adjoining roof of the church would have to be left in place. It's likely that new enclosure walls, both on the west and the south

side, would have to be built to connect this portion of existing wall with the tower, impacting the proposed design of the new building.

- Two alternatives regarding the tower's future structural integrity would need to be fully investigated.
 1. The tower would be treated as an independent structure, isolated from the new residential building. Under this scenario, structural reinforcement would be required. The existing foundations would have to be augmented due to new load arrangement.
 2. The tower would be incorporated into the new structure. A system of connecting elements between the old walls/foundations and new structure would have to be developed. New walls alongside the existing tower walls would have to be built to support the new building floors. This alternative would not be practical as the old tower walls would likely have to be treated as part of the new building lateral system, thus requiring retrofitting to conform with the code seismic requirements.
- The existing foundations would have to be investigated to determine suitability to support the tower under either alternative above. Possible foundation modifications would have to be designed.
- It appears that the tower foundations are located higher than the future residential building foundations. The tower foundations would therefore also have to be underpinned.
- The tower would have to be temporarily braced while the new building is constructed. This would either require bracing on the exterior, which would be difficult to do with construction of the new building, or bracing undertaken within the tower.
- There is a significant amount of deterioration of the tower walls including large cracks in the east and west facades that in some cases extend from the exterior to interior of the structure, deteriorated mortar joints, decayed and missing bricks, etc. which would have to be addressed, and which make the structural issues described above even more challenging.

Overall, these issues would need to be investigated to determine the scope of the structural work including to repair defects at the tower, properly design a temporary bracing system for the tower during construction of the new building, determine how to separate the tower from the church structure, and determine how to join the new building to the tower. The cost of performing the investigations to fully evaluate the structural feasibility of retaining the tower and joining the new building to it as described above, coupled with undertaking the additional structural work at the site, would be cost prohibitive for an affordable senior housing project seeking local and state funding. The construction costs to preserve the tower are estimated at 2-2.5 million, with additional estimated costs of up to \$80,000 for engineering investigation and design services as listed above. In addition, the tower contains no usable space. The tower has a small footprint with no floors and provides sufficient area for a staircase. The staircase, which would need to be retained to allow vertical access within the tower structure for maintenance and roof access, would preclude the use of the tower for any other purpose. Therefore, retention of

the tower would result in substantial additional costs to the project but would not provide any usable space, making retention of the tower an infeasible option for the project.

ALTERNATIVE 3: REMOVE CHURCH AND CONSTRUCT NEW BUILDING CONTAINING UNIVERSAL PRE-K SCHOOL AND AFFORDABLE SENIOR HOUSING (FEASIBLE ALTERNATIVE)

As it is not feasible to retain all or portions of the Zion Lutheran Church as part of the proposed Universal Pre-K and affordable senior housing project, the applicant proposes the demolition of the Zion Lutheran Church and new construction of an approximately 70,323 gross square foot building with 74 affordable housing units for seniors (the feasible alternative). The building would be nine-stories with an L-shaped footprint (see **Appendix E**). The portion of the building at the corner of Fourth Avenue and 63rd Street would have a six-story street wall with two additional floors setting back 10- to 15-feet from Fourth Avenue and 63rd Street in conformance with zoning. The ninth floor and a penthouse would be even farther set back, towards the center of the building. Along Fourth Avenue in the location of the existing educational building, a nine-story section of the building would rise without setbacks. Along 63rd Street, the six-story street wall would extend approximately 74 feet from the corner with Fourth Avenue. An approximately 25-foot-wide, four-story section would be at the east end of the building, adjoining the townhouses at 414 and 416 63rd Street. Two additional stories would set back approximately 22 feet from the façade. Roughly 2/3 of the ground floor of the 63rd Street façade would be set back from the sidewalk, creating a link with the townhouses to the east, which are set back behind stoops. In addition, the ground floor façade of the building along 63rd Street would have a curving façade, as would the set back seventh and eighth floors, echoing and complementing the bowed facades of the townhouses in the Sunset Park Historic District including on 63rd Street.

As required by the SCA, an approximately 1,350 sf outdoor play area for the Pre-K school would be located behind the townhouses, in the location of the existing rear yards at 414 and 416 63rd Street. There would be a second story terrace behind the new building for use by the senior residents of the proposed project. A gardening deck would be located at the sixth floor setback of the building.

The new building would contain an approximately 15,000 gsf Universal Pre-K school. The ground floor of the new building would be occupied by the residential and school lobbies, with the residential entry on 63rd Street and the school lobby on Fourth Avenue. The remainder of the ground floor would be occupied by four classrooms and associated student bathroom facilities. The basement level would contain the school's administrative offices, kitchen, custodial and storage space, and an indoor play area.

A community room for the senior residents would be located on the second floor of the building. Small lounges with adjoining laundry facilities would be provided on each of the second-ninth residential floors to provide easy access for elderly tenants who may have limited mobility. The townhouse tenants will be allowed to make use of all the common spaces in the main building.

The property at 6309 Fourth Avenue is located in an ideal location to provide affordable senior housing. The site is within four blocks of major food, drugstore and other retail shopping, banks, and the local R-train and express N-station, three bus lines, Leif Ericson Park, P.S. 917K (School of Math, Science and Health Living), which will have some intergenerational programming for the elderly residents to participate in, P.S. 503 (The School of Discovery), P.S.

506 (The School of Journalism and Technology) and High School of Telecommunications and Technology. The area has excellent access to municipal services, including an FDNY station less than 1/3 of a mile away and a police station less than 1/4 mile away. Two senior centers are within a half mile and two others within one mile of the site.

Demolition of the Zion Lutheran Church would result in an Adverse Effect but would allow for the construction of a financially viable project with a Universal Pre-K school to serve the community, and a total 83 new units of affordable senior housing to be located in a new building and in the adapted townhouses at 414 and 416 63rd Street. The proposed project would create permanently affordable housing for seniors in an area experiencing a rapid diminishment of affordable housing through rising rents associated with gentrification.

414 AND 416 63RD STREET

As described above, the proposed project would adaptively reuse the townhouses at 414 and 416 63rd Street to create nine affordable senior units. These would include seven studio units and two one-bedroom units to be located on all three floors of the buildings (see **Appendix D**). The project needs to maximize the number of affordable senior housing units that can be located at the townhouses to make the project feasible. As shown in **Table 1**, the nine units in the townhouses, combined with the 74 units proposed in the new building, allow for a financially viable project. To create the nine units, the interior of the townhouses would need to be renovated to join the townhouses for efficiency purposes and to partition the existing spaces. This would include making one or two connections on each floor through the masonry party wall between the two townhouses. In addition, the staircase at 414 63rd Street would be removed, and a new elevator to serve the senior residents installed at 416 63rd Street. The staircase at 416 63rd Street would also need to be removed and replaced at that location, as the number of units would require that a new enclosed staircase be built to meet fire code. In addition, the existing stairs are steep, and would need to be rebuilt so that they are at a more gradual grade so that seniors may be encouraged to use them and to use them safely.

At this time, it is anticipated that an ADA compliant entrance to serve the 9 units could be created at the ground floor location of the two paired windows in the bowed section of 416 63rd Street, which is located between the two stoops of the townhouses (see **Appendix B**, which contains an elevation of the existing 63rd Street facades of the buildings). It is also expected that the original stoops could be retained, with the entrance at 414 63rd Street potentially utilized as a secondary entrance to the unit to be located on the parlor floor at that location.

Due to the need to generate the nine units of affordable senior housing, there is no feasible alternative but to remove original circulation elements such as the staircases, partition walls, and the decorative elements in the buildings, which are limited to the staircase newel posts and railings, doorway moldings, and in at least one instance, pressed-metal ceilings. The applicant would continue to consult with SHPO as design proceeds with respect to the design of the senior units at the townhouses.

F. CONCLUSION

As described above, the applicant has considered alternatives to the demolition of Zion Lutheran Church with the goal of avoiding an Adverse Effect, and barring that, trying to minimize the Adverse Effect. Consistent with that goal, the applicant has explored the potential of 1)

adaptively reusing the existing church and constructing a new connecting building in the area of the adjacent non-historic educational building to the south to provide the Universal Pre-K school and affordable senior housing; 2) retaining a portion of the existing church and otherwise removing the majority of the church and constructing a new building to house the Universal Pre-K school and affordable senior housing in its place; and 3) removing the church and constructing a new building to house the Universal Pre-K school and affordable senior housing.

As described above, the church is designed with a basement level multi-purpose room, a double height sanctuary at the second floor, and with a ground floor entry that provides access to the basement and second floor levels via stairs. As discussed for Alternative 1, conversion of the church could yield 10 units of affordable senior housing or potentially house the Universal Pre-K school. Any adaptive reuse of the church for residential use would require substantial alterations to the exterior of the building including its principal Fourth Avenue and 63rd Street facades to remove the stained glass windows and to insert new fenestration to meet light and air requirements, as well as the full renovation of the interior of the church to add an additional floor and repartition the spaces for residential units. Reuse of the church building for Pre-K use would also require interventions to the exterior of the church to create sufficient light and ventilation, and would also require substantial alterations to the interior to renovate the building for classrooms and to meet ADA requirements. This alternative would, therefore, result in a significant adverse impact to the historic character of the church.

Since the educational building to the south is not historic and not located within the boundaries of the Sunset Park Historic District, the potential of developing a larger new connecting building to the church in the location of the existing educational building to the south of the church was explored. However, a new building would only yield 30 units. With 10 adaptive reuse units in the church and nine adaptive reuse units in the townhouses at 414 and 416 63rd Street) a maximum of 49 units could be developed. As shown in Table 1, the provision of 49 units results in a funding gap of \$9,446,766 for this scenario (Alternative 1). In addition, only a small pre-K school could be provided, unless additional affordable senior units were replaced with classroom space, which would further reduce the unit count and increase the funding gap.

As it is not feasible to retain the church building and adaptively reuse it for the proposed affordable senior housing and Universal Pre-K use program in combination with the construction of a new building in the location of the non-historic educational building, the applicant evaluated whether any portions of the church building could be retained in a meaningful way, with preservation value, and still generate a project that provides the minimum required 74 units in a new building. However, retention of the church facades would pose significant structural engineering challenges and associated increased construction costs and would also result in the reduction of affordable housing units that could be provided. Furthermore, the preservation of the facades would have minimal preservation value, as the massing of the church with its gable roof and general historic appearance would be substantially impacted, rendering such an alternative of little or no preservation value. In addition, the applicant explored the potential of retaining the church tower at the east end of the church on 63rd Street. However, there would be considerable engineering challenges associated with retention of the tower that would substantially increase costs and negatively impact the constructability of the project. In addition, due to the existing character of the tower itself, a structure with a small footprint, no floors, and a staircase that would need to be retained to provide vertical access through the tower, retaining the tower additionally serves no programmatic purpose.

In consideration of the proposed project's purpose and need to provide deeply affordable housing for very and extremely low income senior citizens and a Universal Pre-K school for the neighborhood and the constraints associated with utilizing the church building to generate a viable project, there is no prudent and feasible alternative to the demolition of the Zion Lutheran Church and construction of the new 74 unit affordable housing building with the Pre-K school. In addition, the project would also need to maximize the number of senior units that could be located in the townhouses. The renovation of the buildings into smaller nine units consisting of studios and one-bedrooms for seniors would necessitate the joining of the two buildings so that only one circulation core be provided for efficiency; the removal of, and construction of new, partition walls; removal of the staircases; installation of an elevator; and removal of the limited interior architectural detailing.

FAC will work with SHPO to develop measures to partially mitigate the Adverse Effect, which would be set forth in a Memorandum of Agreement pursuant to Section 106 of the National Historic Preservation Act. FAC will also continue to consult with SHPO with respect to the adaptive reuse of the townhouses at 414 and 416 63rd Street as the designs become more fully developed.

FIGURES

9/22/2016



 6309 4th Avenue - Zion Lutheran Church and Educational Building





View southeast of Zion Lutheran Church at 4th Avenue and 63rd Street. 1



View northeast of Zion Lutheran Church and the adjacent educational building to the south on 4th Avenue. 2



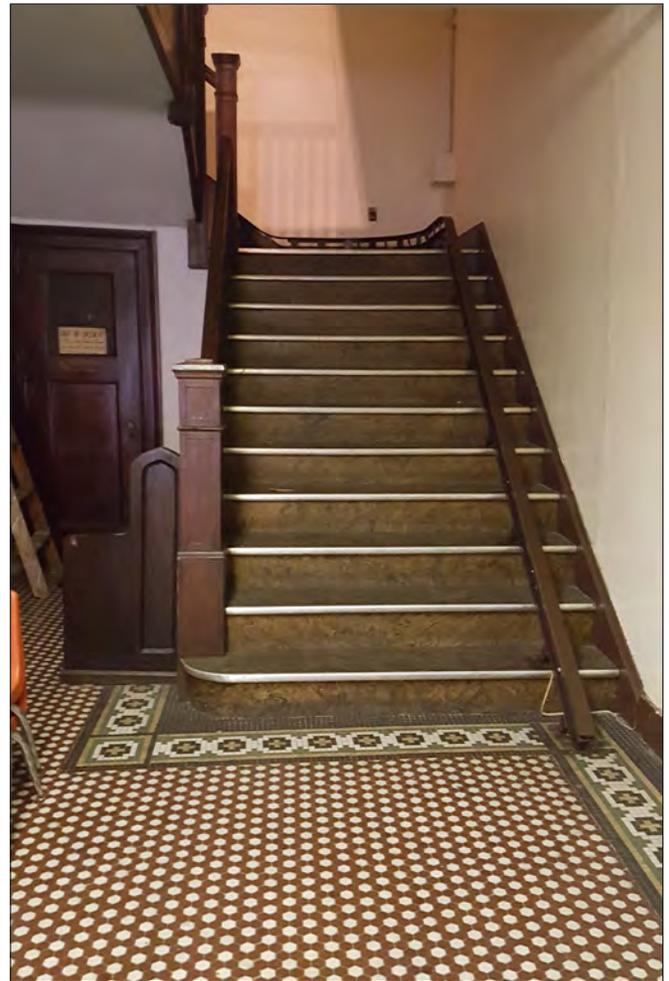
View east of the multi-purpose room in the basement of the church building. 3



View of one of the stairs from the landing that provide access from the ground floor hallway level to the basement level multi-purpose room. 4



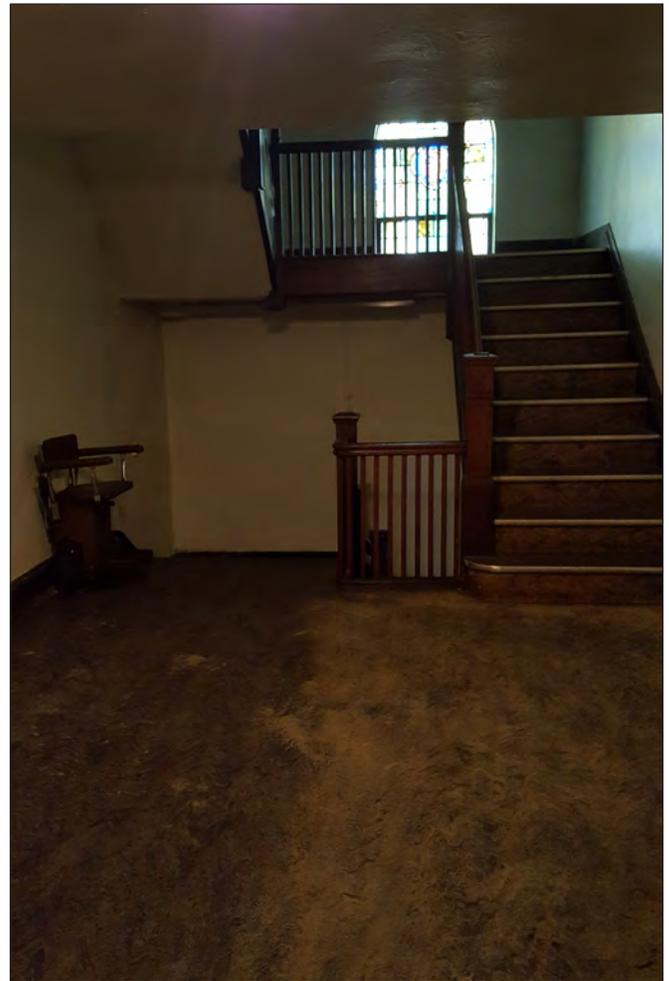
View south in the ground floor lobby/hallway towards the one-story connector structure that links to the educational building. 5



View north in the ground floor lobby/hallway towards the north staircase that provides access to the second story level. 6



View south in the second floor lobby/hallway, including the two sets of doors that provide access to the sanctuary. 7



View north in the second floor lobby/hallway, looking towards the north set of stairs that provide access up to the balcony and down to the ground floor hallway. 8



View east in the sanctuary looking towards the altar. 9



View west in the sanctuary looking towards the balcony (towards 4th Avenue). 10



View east in the sanctuary showing the north wall of the church and clerestory. 11



View east in the sanctuary from the balcony. 12



View of staircase in the church tower. **13**



View of ladder leading to formerly open belfry in the church tower. **14**



View looking down from stair landing at balcony level, towards stained glass window on the north façade of the church at the north stair landing. 15



View looking east from the one-story connector between the Church and educational building. 16

Current Photographs—
Church and Connector
Figure 9