ENVIRONMENTAL ASSESSMENT AND REVIEW DIVISION
Sideya Sherman, Director Department of City Planning

Memorandum

To: Sarah Whitham, Erik Botsford

From: Evren Ulker-Kacar

Date: July 22, 2026

Re: Qualified Action Determination

Land Use Application No.: Pending

Project Name: 254 West 124th Street - Ennis Francis LSRD

CEQR No.: 26DCP054M

Department Determination

The Department of City Planning has reviewed the above-referenced application and determined that, pursuant to Subdivision 5-a of section 8-0111 of the Environmental Conservation Law, it is a Qualified Action not subject to further review under SEQRA / CEQR.

This Qualified Action:

_X__(Subdivision 5-a(b)(i)(1-6)) is an action for the purposes of the construction of housing that shall:

- Be connected to existing community or public water and sewerage systems at the commencement of habitation;
- Be located at a previously disturbed site;
- Not be located within an area zoned exclusively for industrial uses;
- Contain no more than fifty thousand square feet of commercial, retail, community facility or other non-industrial non-residential uses;
- Either:
    - Not exceed 250 dwelling units, or
    - Not exceed 500 dwelling units within a zoning district where, at the time of application, the standard maximum residential building height is greater than

Stephanie Shellooe, AICP, Director, (212) 720-3328 | sshellooe@planning.nyc.gov
Evren Ulker-Kacar, AICP, Deputy Director, (212) 720-3493 | eulker@planning.nyc.gov
120 Broadway, 31st Floor, New York, N.Y. 10271 | Fax: (212) 720-3488

45 feet, the maximum height of a building is regulated by something other than a horizontal plane and that allows residential buildings to exceed 45 feet, or there is no such maximum building height;

- Not include construction of only one single-family residence on a parcel of one-half or more acres.
- (Subdivision 5-a(c)(i)) is subject to local municipal requirements regarding hazardous materials and is accompanied by an applicant certification where applicable.[1]

___(Subdivision 5-a(b)(iii)) is an action for the purposes of construction of public parks located at a previously disturbed site that do not include performance centers, athletic stadiums, or other venues for mass gatherings, or other buildings or structures which do not serve public park, recreation, or open space purposes;

___Subdivision 5-a(b)(iv) is an action for the purposes of multi-use bicycle and pedestrian trails located at a previously disturbed site;

___Subdivision 5-a(b)(v) is an action for purposes of construction of public school facilities to be connected at the commencement of use to existing community or public water and sewerage systems, including sewage treatment works, (Subdivision 5-a(c)(i)) is subject to local municipal requirements regarding hazardous materials, and is accompanied by an applicant certification where applicable.

___Subdivision 5-a(b)(vi) an action for the purposes of water and wastewater infrastructure projects that:

- replace, rehabilitate or reconstruct municipal water or wastewater infrastructure, in-kind and on the same site, including lead service line replacement;
- replace, rehabilitate, upgrade or reconstruct an existing small community water system, including lead service line replacement; or
- provide sewer service to a disadvantaged community served by one or more inadequate sewage treatment systems that has been determined by the department not to require a permit or approval pursuant to articles fifteen, twenty-four or twenty-five of this chapter or any rules or regulations promulgated thereunder;

___Subdivision 5-a(b)(vii) an action for the purposes of a retrofit of an existing structure and its appurtenant areas to incorporate green infrastructure.

[1] E-925 for hazardous materials will be placed on Manhattan Block 1929, Lot 150

Applicant Provided Information

Proposed Actions

The Applicant is requesting the following actions (collectively, the Proposed Actions) to facilitate the Proposed Project:

1. Zoning Map Amendment: Rezone Block 1929, Lots 150, 57, 7505, and 29 (the Affected Area) from R8 and R8/C2-4 zoning districts to R9 and R9/C2-4 zoning districts.
2. Zoning Text Amendment: Amendment to Appendix F to map an MIH district coterminous with the Affected Area.
3. Zoning Authorization: Pursuant to NYC Zoning Resolution (ZR) §75-31, an authorization to waive existing parking within the Ennis Francis plan boundaries.
4. Special Permit under the LSRD: A special permit to modify the spacing requirements of NYC ZR §23-371 (Standard minimum distance between buildings) to allow the Proposed Project's location in the Ennis Francis LSRD pursuant to Section §78-312, Subsection F of the NYC ZR.
5. Non-ULURP Modifications to the Ennis Francis LSRD: Pursuant to NYC ZR § 78-311 (authorizations) and 78-312, updating previously approved plans and zoning calculations to (i) modify the total amount of floor area; (ii) modify the number of dwelling units; (iii) substitute at-grade open space for rooftop recreation space; and (iv) reduce the amount of accessory parking in the LSRD.

It is noted that the proposed modifications are subject to site plan approval; the site plan prepared in connection with the Proposed Project will establish development parameters at Lot 150, ensuring that any deviations from the approved development would require additional discretionary approvals; this includes the proposed area, bulk, and height of the Proposed Project. The LSRD will apply the height factor and open space regulations that apply to sky exposure plane buildings.

Proposed Project

The Applicant's Proposed Project consists of the construction of two attached 22-story / 225-foot buildings (with cellar), totaling 249,696-GSF / 220,886-ZSF combined (increasing the overall built FAR within the LSRD from 5.85 to 8.95; one building would total 110,677 ZSF while the other would total 110,209 ZSF, and both would encompass 124,848 GSF each). The Applicant's proposed new development includes residential uses and ground-floor community facility uses. A total of 221 residential dwelling units over 228,435-GSF / 199,625-ZSF of residential floor area is proposed, increasing the residential FAR within the LSRD from 5.71 to 8.51. Additionally, 21,261 GSF / ZSF of ground-floor community facility space is proposed, increasing the community facility

FAR in the LSRD from 0.10 to 0.40. The Applicant intends to lease this community facility space to an LGBTQIA community center. The proposed buildings would also feature 18-foot rooftop bulkheads, bringing the overall structure height to 243 feet (225-foot building height plus 18-foot rooftop bulkheads).

Additionally, a U.S. Department of Housing and Urban Development (HUD) use agreement at Lot 150 requires that 50 percent of dwelling units (110) be made affordable. A portion of the required affordability would be achieved through utilization of the MIH program; utilization of Option 1 (25 percent of residential floor area) would yield 55 MIH units at an average of 60 percent of area median income; utilization of Option 2 (30 percent of residential floor area) would yield 66 MIH units at an average of 80 percent of area median income; utilization of Option 3 (20 percent of residential floor area) would yield 44 MIH units at an average of 40 percent of area median income. The balance of the affordability requirement (44 to 66 units) would be achieved through utilizing HPD's Extremely Low & Low-Income Affordability (ELLA) program. Utilization of the MIH program increases the maximum permitted residential floor area within the proposed R9 district from 7.52 to 9.02, with a maximum overall permitted FAR of 10.0, with the provision of community facility uses; the overall maximum FAR within the LSRD would be ultimately limited to what is proposed in the Proposed Project's site plan, which is a requirement associated with the requested Ennis Francis LSRD modifications under the Proposed Actions.

Future Without the Proposed Actions (No-Action Condition)

Absent the Proposed Actions, existing conditions at the Ennis Francis LSRD, including Projected Development Site 1, would remain as is. Without the various components of the Proposed Actions, including Zoning Map and Text Amendments, Authorization, Special Permit, and LSRD plan modifications, redevelopment of Projected Development Site 1 with a use other than what currently exists there now (i.e., a surface parking lot fulfilling accessory parking requirements associated with residential development at Lot 7505 within the Ennis Francis LSRD) would be prohibited pursuant to the LSRD as it is currently construed. It is noted that the Proposed Actions include a waiver of existing parking requirements as they apply to existing residential development within the LSRD, such that the parking lot at Projected Development Site 1 would no longer be required.

Future With the Proposed Actions (With-Action Condition)

Development Assumptions

The Proposed Project features an average dwelling unit size of approximately 1,033 GSF (228,435 GSF of proposed residential floor area divided by 221 total dwelling units). For

the purposes of a conservative analysis framework, an average per dwelling unit floor area of 640 GSF was utilized (which is consistent with recent development at Lots 57 and 7505 within the Ennis Francis LSRD, both of which were constructed by the Applicant), resulting in 357 dwelling units.

As previously discussed, the LSRD campus is considered a single zoning lot, such that FAR calculations are based on the combined floor area and lot area of all lots situated within the campus. Thus, in connection with the Proposed Project, the Applicant's intended improvement of Lot 150 would utilize the majority of the available floor area within the Ennis Francis LSRD under the Proposed Actions. Upon completion of the Proposed Project, the overall total LSRD campus FAR would reach 8.95, which is within the limits of a maximum of 10.0 FAR that would be permitted under the new proposed R9 zoning district. More specifically:

- The overall residential FAR within the LSRD campus would reach 8.51, which is within the limits of a maximum of 9.02 FAR that would be permitted under the proposed new R9 zoning district.
- Along the same lines, the overall LSRD campus community facility FAR would reach 0.40, which is within the limits of a maximum of 10.0 FAR permitted under the proposed new R9 zoning district (the community facility floor area would be occupied with an LGBTQIA community center, pursuant to the Memorandum of Understanding (MOU), dated September 2018.
- Similarly, the overall commercial FAR within the LSRD would reach 0.04, which is within the maximum of 2.0 FAR permitted under the existing C2-4 commercial overlay district mapped at Lot 29, which is not expected to change as part of the Proposed Actions.

The Applicant's Proposed Project is subject to site plan approval pursuant to the zoning specifications required under the Proposed Actions. The site plan prepared in connection with the Proposed Project will establish development parameters at Lot 150, ensuring that any deviations from the approved development would require additional discretionary approvals, which includes the proposed maximum building height at Lot 150 (225 feet) and proposed floor areas and built FARs. It is noted that Projected Development Site 1 is considered an “eligible site” pursuant to NYC ZR § 23-434, such that the maximum permitted height under the rezoning components of the Proposed Actions is 285 feet. However, as the Proposed Project is subject to site plan review associated with the requested LSRD modifications as part of the Proposed Actions, the Proposed Project’s height (225 feet) is the maximum achievable height under the Proposed Actions and therefore represents the Future With-Action Scenario height.

The Applicant's Project Site (Lot 150) would therefore represent the only development site realized under the Proposed Actions (i.e., Projected Development Site 1). The total floor area within the LSRD will be developed to approximately 90 percent of what is permitted under the Proposed Actions. Additionally, it is noted that Lots 57 and 7505 were recently redeveloped by the Applicant in 2021 as part of a previous project. Additionally, Lot 29 is unlikely to represent a development site under the Proposed Actions, as it is a cooperative building, such that a developer would have to assemble all ownership of all individually owned units to redevelop this site (potentially up to 160 units). Additionally, this building was constructed in 1920 (i.e., pre-1974) and features more than six (6) dwelling units - such buildings are likely to be rent-stabilized and difficult to demolish due to legal requirements associated with tenant relocation.

Future With-Action Scenario

The Future With-Action Scenario consists of the construction of two attached 22-story / 225-foot buildings (with cellar), totaling 249,696-GSF / 220,886-ZSF combined (increasing the overall built FAR within the LSRD from 5.85 to 8.95; one building would total 110,677 ZSF while the other would total 110,209 ZSF, and both would encompass 124,848 GSF each). The Future With-Action Scenario includes residential uses and ground-floor community facility uses. A total of 357 residential dwelling units over 228,435-GSF / 199,625-ZSF of residential floor area is proposed, increasing the residential FAR within the LSRD from 5.71 to 8.51. Additionally, 21,261 GSF / ZSF of ground-floor community facility space is proposed, increasing the community facility FAR in the LSRD from 0.10 to 0.40. This community facility space would be tenanted with an LGBTQIA community center under the Future With-Action Scenario. The proposed buildings would also feature 18-foot rooftop bulkheads, bringing the overall structure height to 243 feet (225-foot building height plus 18-foot rooftop bulkheads).

Additionally, a U.S. HUD use agreement at Lot 150 requires that 50 percent of dwelling units (110) be made affordable. A portion of the required affordability would be achieved through utilization of the MIH program; utilization of Option 1 (25 percent of residential floor area) would yield 89 MIH units at an average of 60 percent of area median income; utilization of Option 2 (30 percent of residential floor area) would yield 107 MIH units at an average of 80 percent of area median income; utilization of Option 3 (20 percent of residential floor area) would yield 71 MIH units at an average of 40 percent of area median income. The balance of the affordability requirement (71 to 107 units) would be achieved through utilizing HPD's ELLA program. Utilization of the MIH program increases the maximum permitted residential floor area within the proposed R9 district from 7.52 to 9.02, with a maximum overall permitted FAR of 10.0, with the provision of community facility uses; the overall maximum FAR within the LSRD would

be ultimately limited to what is proposed in the Proposed Project's site plan, which is a requirement associated with the requested Ennis Francis LSRD modifications under the Proposed Actions.

Development Increments Under the Proposed Actions

	Future No-Action Scenario	Future With-Action Scenario	Increment
Residential Uses			
Residential GSF	469,570 GSF	698,005 GSF	+228,435 GSF
Affordable Dwelling Units	329	507	+178
Total Dwelling Units	497	854	+357
Community Facility Uses			
Community Facility GSF	7,164 GSF	28,425 GSF	+21,261 GSF
Commercial Retail Uses (Restaurant / Eatery)			
GSF	3,200	3,200	No Change
Parking Facilities			
Accessory Spaces	67	0	-67 Accessory Spaces
Garage Spaces	25	25	No Change
Total Parking Spaces	82	25	-67 Total Parking Spaces

carthageadvisors

Applicant Hazardous Materials Certification

Pursuant to Subdivision 5 of Section 8-0111 of the Environmental Conservation Law, certain applications seeking a Qualifying Action determination by a lead agency must complete an Applicant Certification regarding hazardous materials remediation.

Project Name: 254 W. 124th Street - Ennis Francis LSRD

Applicant Name: Carthage Real Estate Advisors, LLC

Contact: Edward Poteat (epoteat@carthageadvisors.com)

Date: July 21, 2026

Project Number:

Project BBLs: 1019290150, 1019290057, 1019297505, 1019290029

I, Edward Poteat, am President of Carthage Advisors LLC, the applicant ("Applicant") for the below listed actions (collectively, "the Application"):

1. Zoning Map Amendment: Rezone Block 1929, Lots 150, 57, 7505, and 29 (the Affected Area) from R8 and R8/C2-4 zoning districts to R9 and R9/C2-4 zoning districts.
2. Zoning Text Amendment: Amendment to Appendix F to map an MIH district coterminous with the Affected Area.
3. Zoning Authorization: Pursuant to NYC Zoning Resolution (ZR) §75-31, an authorization to waive existing parking within the Ennis Francis plan boundaries.
4. Special Permit under the LSRD: A special permit to modify the spacing requirements of NYC ZR §23-371 (Standard minimum distance between buildings) to allow the Proposed Project's location in the Ennis Francis LSRD pursuant to Section §78-312, Subsection F of the NYC ZR.
5. Non-ULURP Modifications to the Ennis Francis LSRD: Pursuant to NYC ZR § 78-311 (authorizations) and 78-312, updating previously

approved plans and zoning calculations to (i) modify the total amount of floor area; (ii) modify the number of dwelling units; (iii) substitute at-grade open space for rooftop recreation space; and (iv) reduce the amount of accessory parking in the LSRD.

Applicant seeks a determination that the Application is a Qualifying Action under Subdivision 5 of Section 8-0111 of the Environmental Conservation Law (the "Qualifying Action"). Applicant is the fee owner of 1019290150 (the "Property"), subject to the Application.

Applicant acknowledges that the Application is required to comply with local municipal requirements regarding hazardous materials remediation including, as applicable, an E-Designation regarding hazardous materials (E-925) and the completion of a Phase 1 Environmental Site Assessment.

Applicant hereby certifies that:

(1) Applicant has followed and will follow all applicable laws, rules, and regulations regarding hazardous waste;

(2) a Phase I Environmental Site Assessment has been conducted for the Property in accordance with all appropriate inquiries regulations of the United States Environmental Protection Agency under the federal Comprehensive Environmental Response, Compensation, and Liability Act (40 CFR Section 312) to identify any recognized environmental conditions;

(3) Applicant has followed or will follow all applicable recommendations of such Phase I Environmental Site Assessment for the Property; and

(4) Applicant will report contamination at, on, or under the Property as required by applicable laws, rules and regulations.

Edward Poteat

Edward Poteat