



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD No. 4

330 West 42nd Street, 26th floor New York, NY 10036
tel: 212-736-4536 fax: 212-947-9512
www.ManhattanCB4.org

WALTER MANKOFF
Chair

ANTHONY M. BORELLI
District Manager

February 28, 2005

Rachel Shatz
Director of Planning and Environmental Review
Empire State Development Corporation
633 Third Avenue
New York, NY 10017

via fax: 212-803-3855

Re: Comments on the Farley Post Office/Moynihan Station Redevelopment Project Draft Public Scoping Document for the Preparation of an Environmental Impact Statement

Dear Ms. Shatz:

At its meeting on February 22, 2004, the Executive Committee of Manhattan Community Board No. 4 approved the following comments on the Farley Post Office/Moynihan Station Redevelopment Project Draft Public Scoping Document for the Preparation of an Environmental Impact Statement. These comments are subject to a vote by the full board at its next meeting on March 2, 2005.

COMMENTS ON PROPOSED TASKS

General

The proposed project involves the redevelopment of the Farley Building **and** the consolidation of United States Postal Office (USPO) operations at the Morgan Facility (two block-long buildings located west of the Farley Building and one block south). Although the potential affects of the USPO relocation to the Morgan Facility were assessed in the 2003 Draft Supplemental Environmental Assessment and related conclusions will be summarized in the Farley Post Office/Moynihan Station Redevelopment EIS, complete impact analysis of the proposed project requires assessment and analysis from study areas defined from **both** geographic locations.

The findings and conclusions of the Hudson Yards Rezoning Final Generic EIS will also be used in the environmental analysis of the proposed project. The Hudson Yards EIS contains a number of flaws, particularly concerning traffic analysis. The EIS for the proposed project should address these flaws. Some of these defects are currently the subject of two lawsuits. Because the Hudson Yards redevelopment plan has the potential to create by far the greatest negative impacts on traffic and parking conditions, we repeat them below.

The redevelopment of the Farley Building will provide a new rail passenger terminal, approximately 1.1 million square of redeveloped commercial space, space for continued (though diminished) operations of the USPO, and potentially approximately 1 million square feet of new commercial and/or residential space in a Phase II. The proposed project will be sponsored and carried out by the Empire State Development Corporation and therefore not subject to the City's Uniform Land Use Review Procedure (ULURP). However, a project of this scale and importance warrants public input and we insist on some form of meaningful public review.

Task 3. Land Use, Zoning and Public Policy

The defined land use study area should be a ¼ mile from both the Farley Building and the Morgan Facility buildings so that the major land use changes expected in the proposed West Chelsea Special District and in the Hudson Yards area are fully taken into account.

Task 4. Socioeconomic Conditions

The Hudson Yards and West Chelsea rezonings will attract new residential uses in areas previously sparse. Although transportation and commercial uses may dominate, the area around the Moynihan Station proposal should not be characterized as lacking residential uses. 29th and 30th Streets directly to the south are almost entirely residential with densely built walkups and elevator apartments. These streets contain a significant number of the remaining SRO units in the city. Displacement pressures on this population in particular from building conversion and replacement should be studied. Just south of 29th Street is Penn South, which contains 2,820 units.

34th Street between Ninth and Tenth Avenues is densely residential. Major residential buildings that should not be overlooked include: The Webster Apartments (413 W. 34th St.) containing 390 residential units; the former Y (354 W. 34th St.) containing 254 residential units; the "B&H" building (420 Ninth Av.) containing 19 residential units; and a new FIT dormitory currently under construction at 406 W. 31st St. that will contain 493 apartments.

Task 5. Community Facilities and Services

The scoping document says that the proposed Phase II commercial development scenario would have been considered in the Hudson Yards Rezoning FGEIS as part of the long-term projected commercial development. Nothing involving Farley, however, was listed as a development site in the Hudson Yards Rezoning FGEIS. Thus the Hudson Yards EIS cannot be relied on for this purpose and additional analysis is required to understand the impact on police, fire, emergency, and other services. The proposed Phase II analysis should not be limited to schools alone.

Task 6. Open Space

The study area for commercial projects should include ¼ mile from Morgan Facility buildings because the redevelopment plan will not only attract well over 500 new workers at the Farley building, but also will shift hundreds of workers from the current job site at Farley to the Morgan buildings.

The residential population described under Task 4 should be taken fully into account. The analysis of open space and recreational facilities should be based on current population as projected from the 2000 census, not taken from it. The 2000 census count did not include residential units in buildings

that were completed since: the Penmark Tower at 315 W. 33rd St. contains 333 units and the residential building at 363 W. 30th Street contains 77 units. Further, 493 apartments in the FIT dormitory on 31st Street are expected to house 1,100 students in need of passive and active recreation facilities.

Task 7. Shadows

The analysis of shadow impacts should be based on a full buildout of the floor area cited as possible in Phase II. The amount of public open space is limited, but potential impacts on historic resources are large, in particular the impact on the Farley building itself, with the proposed glass “wing” to be erected between the original building and the western extension. Shadows could impact many features of the historic building, among them the glass-roofed concourse that is to continue the original roof of the sorting room. The impacts on the public space of this concourse will be considerable.

Task 8. Historic Resources

This analysis as well must be based on a full buildout of Phase II. The impacts of this change on the historic structure as a whole will be immense. The Western Annex was carefully designed to harmonize in scale, materials, and design with the original structure. Erecting a structure of this size on the Annex will change the entire character of the Moynihan Station, an iconic building that is intended to replace the original Pennsylvania Station, as a structure of similar design and materials by the same architects.

Mitigations to be considered should include alternative uses for the unused floor area, among them the transfer of development rights off the site by such mechanisms as a 74-711 procedure.

Task 9. Urban design and resources

The issues in this section are related to those in the previous sections. The restoration and reuse of the existing structure in Phase I will on the whole be beneficial to the urban design of the area, but the analysis of Phase II will have to include the effect of the introduction of a structure of this size on the area surrounding it, which is mostly of low and moderate scale

Task 10. Neighborhood Character

Phase I of the development raises many questions, but since the railroad uses will largely be just shifted somewhat from the present Penn Station, the analysis should concentrate on the proposed commercial development. The analysis of Phase II should concentrate not only on the new uses and their impacts, but also, as in the previous tasks, on the effect of the introduction of this huge new element into the neighborhood.

As in Task 4, although transportation and commercial uses may dominate, the area should not be characterized as lacking residential uses. Penn South lies just south of 29th and contains 2,820 units. 29th and 30th Streets are almost entirely residential with densely built walkups, elevator apartments, and SRO's. Residential uses that should be included are: The Webster Apartments (413 W. 34th St.) containing 390 residential units; the former Y (354 W. 34th St.) containing 254 residential units; the “B&H” building (420 Ninth Av.) containing 19 residential units; and a new FIT dormitory (406 W. 31st St.) containing 493 apartments.

Tasks 12. Infrastructure, Solid Waste and Sanitation Service and Energy

Each of these assessments should include the potential for sustainable/"green" building techniques to mitigate the proposed project's impact on water consumption, sewer systems, stormwater drainage, solid waste and sanitation services, and energy consumption. Standards should be LEED Certified Gold Level for new commercial buildings and LEED Certified Silver Level for new residential buildings.

For Phase II especially, the analysis should contain a detailed evaluation of the project on sanitary sewage and stormwater. This is important because of the cumulative impacts of development on the West Side on the North River Pollution Control plant and on stormwater discharges in the Hudson River from combined sewer outlets.

Task 13. Traffic and Parking

Traffic – One of the principal impacts of the proposed project is the shift of USPS activity from the Farley Complex down to the Morgan Facility. Among other things, this will increase truck traffic on 29th Street, which is a major approach to the Lincoln Tunnel. Westbound traffic must pass through the Morgan Post Office and will encounter delays from trucks maneuvering to and from the loading docks. This will cause diversion of more Lincoln Tunnel and George Washington Bridge bound traffic to 25th and 23rd Streets. These in turn are likely to be affected by FIT's current proposal to close 27th street between Seventh and Eighth Aves. In order to account for the likeliness of this scenario, the southern boundary of the traffic study area should be 23rd Street.

The Lincoln Tunnel, especially access and egress points near Ninth Avenue, and Herald Square are already congested locations. The traffic study area's northern boundary should be extended to at least 37th Street to include Lincoln Tunnel's "Ramp C"; its eastern boundary should encompass all Broadway intersections at Herald Square, not just the Sixth Avenue intersections. Since 35th Street is likely to be used by traffic wishing to avoid increased traffic using the Farley building, it must be included from Sixth Avenue westward.

This EIS relies on the Hudson Yards EIS, the traffic analysis of which was particularly defective in a number of areas. This Community Board outlined a number of problems in that study; yet no significant change in methodology occurred as a result. Analysis of the proposed project will thus be equally flawed.

We repeat those concerns below:

"Individual traffic movements at each of the analysis intersections will be conducted during the AM, midday, and PM peak periods on a single typical weekday." This is hardly sufficient, especially in the area of approaches to the Lincoln Tunnel. Traffic counts must account for additional traffic and congestion on Wednesday and Friday afternoons, for the seasonality of Manhattan traffic, and for the variability of its weather. (Page 33 of the Hudson Yards Scoping Document)

In analyzing the traffic impacts associated with events at the Multi-Use Facility and expanded Convention Center, traffic data should be collected for times when surrounding event spaces, including Madison Square Garden, the Broadway Theaters, the Hudson River passenger ship terminals and Pier 94 and the Lincoln Center theaters are all simultaneously

hosting events. The reasonable worst-cases analysis must include the simultaneous flow of traffic to and from such events. (Page 33)

The traffic counts and movements collected for the Far West Midtown Transportation Study must be supplemented to include the effects of new developments since the Study. (Page 34)

The "other travel modes" to be considered in the estimate of the travel demand characteristics of the development resulting from the [Hudson Yards] Proposed Action must include commuter buses and vans. Trip generation and modal split estimates must also be developed for the proposed PABT garage. Trip generation and modal split estimates for the Multi-Use Facility must be independently developed, and should not rely on information provided by the New York Jets, the National Football League or any other organization with an interest in the outcome. (Page 34)

Future traffic volumes are to be based on "an annual background growth rate of 0.5% recommended by the CEQR Technical Manual for the Midtown Manhattan area." Simulations should be applied for 40-year period. (Page 34)

The significant development projects anticipated to be in place by the analysis years should include the redevelopment contemplated by and the Special West Chelsea District Rezoning (Page 34).

Traffic queuing data should take into account spillback from one block to the next, which is especially important on avenues since the blocks are short. This measure should be accounted for, even outside modeling software if necessary. Traffic queuing data should also be support data for the air quality and noise analyses. (Page 34)

Parking – The parking study area should extend at least ½ mile from the borders of the Rezoning Area, and the study should take into account the practice of seeking out free on-street parking and taking cabs or mass transit to get to the Multi-Use Facility and the Convention Center. The number of cars with out-of-state plates parked in Chelsea and Clinton on evenings and weekends gives a good hint of what could be engendered by stadium patrons. In addition to a qualitative assessment of on-street parking conditions, some conditions, such as double parking, should be evaluated quantitatively and included into the traffic flow analysis as a constraint on street capacity. (Page 35)

Our experience is that commuter buses and vans bringing passengers from outside Manhattan remain in Manhattan until their passengers are ready to return to New Jersey or wherever else they came from. The assessment of parking demand should be based on actual counts of buses and vans parked in the core study area for the traffic assessment, and the estimate of the increased travel demand associated with buses and vans resulting from the [Hudson Yards] Proposed Action. (Page 35)

The assessment should assume that all surface parking facilities will be removed as a result of the [Hudson Yards] Proposed Action. (Page 36)

The proposed PABT garage should be considered part of the [Hudson Yards] Proposed Action, not a mitigation measure. (Page 36)

Task 14. Transit and Pedestrians

The pedestrian and traffic analyses should include studies based on both Amtrak use and exclusively commuter use, since the modal split between pedestrians, taxis, and other means will vary according to the dominant use.

The proposed project, and the related consolidation of USPS operations at the Morgan Facility, will straddle the new FIT dormitory on 31st Street and further exacerbate nearby pedestrian problems for students passing between the college and the dormitory, especially around 30th Street and Ninth Avenue

Transit and pedestrian impact analysis should cover the all sidewalks and corners in Herald Square as well as the transit hub below it. It should also include corners around and near the Morgan facility, especially intersections at 30th Street at Ninth and Tenth Avenues and 29th Street and Eighth Avenue. Consideration should be given to reopening and improving the underground pedestrian passageway between Herald Squarer and Penn Station as mitigation.

The transit assessment should include a review of the MTA's 1988 analysis of a subway spur running west from Penn Station to Eleventh Avenue under West 33rd Street.

The focus of the subway and commuter rail analyses should include impacts of the [Hudson Yards] Proposed Action on subway services at Times Square, as well as those directly serving the area and No. 7 Subway service. (Pages 36-37)

Sincerely,



Walter Mankoff
Chair

Cc: Federal Railroad Administration
USPS
Office of the Mayor
Office of the Manhattan Borough President (Land Use Div.)
Local elected officials
City and State agencies
FIT