

Appendix A: Assessment of Morgan Facility Consolidation

A. INTRODUCTION

As described in Chapter 1, “Project Description,” the Farley Complex Western Annex provided a vital upgrade to Postal Service operations at the time it was built, and was upgraded periodically over the intervening years. To further upgrade operations, the USPS expanded and modernized its operations off-site, at the Morgan General Mail Facility and Annex (the Morgan Facility), which is located at West 28th to West 30th Streets and Ninth to Tenth Avenues. Recently, USPS has dedicated considerable resources to creating a modern and efficient operation by consolidating its mail processing, sorting, and distribution operations into the nearby Morgan Facility and vacating considerable space in the Farley Complex, in part to facilitate the proposed project. This consolidation, which started during the summer of 2003, will ultimately reduce the amount of USPS space used in the Farley Complex to about 250,000 square feet, while increasing the overall efficiency of postal operations.

It should be noted that the USPS initiative to consolidate operations at the Morgan Facility will continue with or without the proposed project.

The consolidation of USPS operations (including mail sorting functions and trucking operations) to the Morgan Facility has required some changes at the facility, including upgrades to systems, and minor changes to the interior loading dock areas. Additional consolidation of some remaining administrative functions will also require some minor changes to the interior of the Morgan Facility to accommodate this staff. However, no major structural alterations would be required at this facility. USPS has streamlined its operations and rerouted deliveries to the Morgan Facility. The loading docks serving the Morgan Facility, which have undergone some minor modifications, are located within the Morgan Annex, on West 29th Street between Ninth and Tenth Avenues.

As described above, USPS has completed the expansion and modernization of its operations at the Morgan Facility and is in the process of completing the consolidation of most of its existing Farley Building operations at the Morgan Facility. (Consolidation of the mail sorting, trucking, and other operations functions was completed in 2004, leaving only some administrative functions left to be relocated.) Overall, the consolidation involves transferring about 900 employees from the Farley Complex to the Morgan Facility. About 600 of these employees (who work over 3 shifts/24-hours day) have already been transferred, including mail sorting and other operations staff, and the drivers associated with truck operations that have also been transferred. About 300 administrative employees (who mostly work during the day) still remain at the Farley Complex, and will be transferred at a later date. This consolidation was analyzed in the 2003 Draft Supplemental Environmental Assessment (SEA). As described in Chapter 1, “Project Description,” a Final SEA was not issued because of continuing project evolution and planning.

The following provides an assessment of the potential significant adverse environmental impacts associated with the continued consolidation of USPS operations from the Farley Building to the

Morgan Facility. The assessment concludes that the consolidation would not result in any such impacts.

B. IMPACT ASSESSMENT

This assessment examines all of the typical EIS environmental analysis areas (i.e., Land Use, Zoning, and Public Policy; Socioeconomic Conditions; Community Facilities and Services; Open Space; Shadows; Historic Resources; Urban Design and Visual Resources; Neighborhood Character; Natural Resources; Hazardous Materials; Waterfront Revitalization Program; Infrastructure, Solid Waste and Sanitation, and Energy; Traffic and Parking; Transit and Pedestrians; Air Quality; Noise; and Construction Impacts), and provides a summary of the types of potential impacts that would be expected to result from the USPS consolidation of operations from the Farley Complex to the Morgan Facility. The assessment methodologies follow the same guidelines as described for each impact category in the main body of this EIS. Where screening analyses would suffice, they have been applied.

LAND USE, ZONING, AND PUBLIC POLICY

The Morgan Facility entirely occupies the blocks between West 28th and West 30th Streets and Ninth and Tenth Avenues. The Morgan Annex, located on the southern block between West 28th and West 29th Streets, is a 1.3 million-square-foot facility (constructed in 1992), which is connected to the northern building by an elevated walkway across West 29th Street. The 1.4 million-gross-square-foot (gsf) northern building, constructed in the 1930s, is connected to the Farley Building by a wide underground tunnel. The Morgan Facility is the USPS's major mail sorting and distribution center in Manhattan.

North of the Morgan Facility on the block between West 30th and 31st Streets is a commercial office building, a surface parking lot, and industrial businesses, such as a restoration and maintenance company. FIT is in the process of renovating and converting an existing loft building located in the midblock on the south side of West 31st Street between Ninth and Tenth Avenues. East of the Morgan Facility between Eighth and Ninth Avenues, a number of residential uses containing a mix of 3 to 12-story apartment buildings are located along West 29th and West 30th Streets. The northern portion of the Penn Station South cooperative residential development is between West 29th and 30th Streets. South of the Morgan Facility is a large superblock that contains Chelsea Park along West 28th Street and Elliot Houses, a New York City Housing Authority residential development, along West 26th Street. The blocks west of the Morgan Facility are predominately industrial with some interspersed residential, commercial, and institutional uses.

Consolidating USPS operations from the Farley Building to the Morgan Facility does not change the land use at the Morgan Facility. Additionally, there are no changes to zoning and public policy at the Morgan Facility or surrounding area. Therefore, the consolidation has no significant adverse impacts on land use, zoning, or public policy.

SOCIOECONOMIC CONDITIONS

Socioeconomic impacts can occur when a proposed action directly or indirectly changes economic activities in an area. The consolidation of USPS operations from the Farley Building to the Morgan Facility would not directly displace any residential population. The consolidation would relocate the existing USPS employees from the Farley Building to the Morgan Facility,

Appendix A: Assessment of Morgan Facility Consolidation

and would not generate additional new employees at the Morgan Facility. Since USPS operations would be consolidated and relocated from the Farley Building to the Morgan Annex, this consolidation would not result in any business or institutional displacement.

The consolidation is not anticipated to affect rents or sales prices of existing or future residential units that may be built in the area, and would not result in indirect residential displacement. Similarly, the consolidated Morgan Facility USPS space would not be commercially rented. Therefore, the consolidation would have no effect on rents in existing or future commercial space, and would not result in indirect business or institutional displacement. Therefore, the consolidation would not result in significant adverse impacts on socioeconomic conditions.

COMMUNITY FACILITIES AND SERVICES

As the consolidation of USPS operations from the Farley Building to the Morgan Facility does not involve the creation of any new residential units, it would not add population to the area, and therefore, it would not create a demand for public schools, libraries, health care facilities, or day care centers. In addition, it would not involve the direct displacement of any fire or police facilities. Therefore, the consolidation would not result in any significant adverse impacts on community facilities.

OPEN SPACE

The on-going consolidation would not directly displace any existing open space resources. The consolidation would relocate the existing USPS employees from the Farley Building to the Morgan Facility, and would not generate additional new employees at the Morgan Facility. As the consolidation of USPS operations from the Farley Building to the Morgan Facility would not involve the creation of any new residential units, it would not add population to the area. Therefore, the consolidation would not create an increased demand on existing open space resources and would not result in any significant adverse impacts on open space.

SHADOWS

The consolidation of USPS operations from the Farley Building to the Morgan Facility does not involve any structural alterations or additions at the Morgan Facility that would create new shadows. Therefore, the consolidation would not result in any significant adverse shadow impact.

HISTORIC RESOURCES

The ten- and six-story USPS Morgan General Mail Facility has been determined eligible for listing on the State and National Registers of Historic Places (S/NR-eligible) and occupies the entire block bounded by Ninth and Tenth Avenues and West 29th and West 30th Streets. It is connected to the Farley Complex by a tunnel. Constructed in 1933 over part of the New York Central rail yards, the building is significant under Criterion C as one of many postal facilities built under a New Deal-generated building program. James A. Wetmore, who was Acting Supervising Architect of the Public Works Branch of the U.S. Treasury Department at the time of the building's construction, is credited with its design. Set on a limestone base, the upper portion of the building is faced in tan brick and articulated with alternating piers and window bays. Art Deco details embellish the ten-story Ninth Avenue portion of the building. A frieze with a geometric relief pattern runs above the base, a belt course with a similar pattern runs above the eighth floor, and a cornice projects above the ninth floor. On the Ninth Avenue façade,

Farley Post Office/Moynihan Station Redevelopment Project

the brick piers take the form of fluted pilasters. Sculpted eagles and carved floral blocks embellish the base. Over the main door is an ornamental bronze screen above a fixed transom window. There is a broken connection to a rail spur from the High Line at the Tenth Avenue façade.

The Morgan Facility Annex, which is not a historic resource, is a three-story concrete, brick and glass building that was constructed around 1992. The Morgan Facility Annex occupies the entire block bounded by Ninth and Tenth Avenues and West 28th and West 29th Streets.

The use of the Morgan Facility for relocated USPS operations has no significant effect on the Morgan Facility exterior, which is not being altered. In addition, since the Morgan Annex is not a historic resource, the minor changes described above would not constitute an impact. The consolidation of uses at the Annex would be in keeping with the historical character of the Morgan Facility, and since the consolidation of operations does not alter the exterior of the Morgan Facility or its Annex, the consolidation would not have contextual or visual impacts to historic resources and there would be no significant adverse effect on historic resources in the study area.

URBAN DESIGN AND VISUAL RESOURCES

The consolidation of USPS operations from the Farley Building to the Morgan Facility does not result in a building or structure substantially different in height, bulk, form, setbacks, size, scale, use, or arrangement than exists. Similarly, the consolidation would not result in above-ground development or change the bulk of new above-ground development. In addition, the consolidation would not change block form, demap an active street, map a new street, or affect the street hierarchy, street wall, curb cuts, pedestrian activity, or other streetscape elements. Therefore, no significant urban design and visual resources impacts result from the consolidation.

NEIGHBORHOOD CHARACTER

The character of a neighborhood is established by numerous factors, including land use patterns, the scale of its development, the design of buildings, the presence of notable landmarks, the intensity of traffic and pedestrian activity, and a variety of other features. According to CEQR criteria, a neighborhood character assessment is conducted if the action would result in a significant impact in the areas of land use, zoning, and public policy; urban design; visual resources; historic resources; socioeconomic conditions; traffic; or noise. In addition, if the action falls below these thresholds but would result in moderate changes in the elements that contribute to neighborhood character, thereby resulting in a potentially significant impact, an analysis of neighborhood character is required.

As stated above, the consolidation of USPS operations from the Farley Building to the Morgan Facility does not result in a change of land use at the Morgan Facility nor will it result in a change to land use and development in the surrounding area. Furthermore, the proposed consolidation does not involve any structural alterations at the Morgan Facility. The loading docks serving the Morgan Facility, which are undergoing some minor modifications, are located within the Morgan Annex on West 29th Street between Ninth and Tenth Avenues. Therefore, the consolidation would not result in an adverse land use or visual impact on neighborhood character. In addition, the consolidation would not generate any new traffic or noise impacts that would affect the character of the existing area. Overall, the consolidation of USPS operations

from the Farley Building to the Morgan Facility would not result in any significant adverse impacts on neighborhood character.

NATURAL RESOURCES

A natural resources assessment is conducted when a natural resource is present on or near the project site and when an action involves the disturbance of that resource. The *CEQR Technical Manual* defines natural resources as water resources, including surface water bodies and groundwater; wetland resources (including freshwater and tidal wetlands); upland resources, (including beaches, dunes, and bluffs, thickets, grasslands, meadows and old fields, woodlands and forests, and gardens and other ornamental landscaping); and built resources, including piers and other waterfront structures.

Based on the dense urban setting, the minor changes to the Morgan Facility would not have any natural resource effects, as identified in the *CEQR Technical Manual*. Therefore, the consolidation would not result in significant adverse impacts to natural resources.

HAZARDOUS MATERIALS

The potential for significant impacts related to hazardous materials can occur when elevated levels of hazardous materials exist on a site and the Proposed Action would increase pathways to their exposure (either human or environmental); or the Proposed Action would introduce new activities or processes using hazardous materials and the risk of human or environmental exposure is increased.

The minor construction related to the consolidation of USPS operations at the Morgan Facility (including removal of attached systems equipment, upgrades to systems, and minor changes to the interior loading dock areas) are not activities that could present a concern to human health. Therefore, the consolidation would not result in any significant hazardous materials impacts.

WATERFRONT REVITALIZATION PROGRAM

The Morgan Facility is not located within the boundaries of the city's Coastal Zone; therefore, no further analysis is warranted.

INFRASTRUCTURE, SOLID WASTE AND SANITATION, AND ENERGY

The consolidation would not result in a land use change or increase the number of employees or visitors to the Morgan Facility. Therefore, the consolidation would not result in increased demand for water supply and sanitary sewage treatment, solid waste management, electricity, gas, and steam services. Therefore, consolidation of USPS operations from the Farley Building to the Morgan Facility would not result in any significant impacts to the City's water supply, wastewater and sewage treatment, the collection or deposit of solid waste, and the consumption or supply of energy.

TRAFFIC AND PARKING

As mentioned previously, USPS has already vacated the majority of the Western Annex, relocating its mail processing, sorting, and distribution operations from the Farley Building to the Morgan Facility. This relocation has resulted in some localized increase in traffic on streets around the Morgan Facility; however, overall, the total number of USPS vehicles (particularly trucks) on the streets has decreased because of the consolidation of the Farley operations at the

Farley Post Office/Moynihan Station Redevelopment Project

Morgan Facility. Trips have been reduced, because trucks no longer need to travel between the two sites or no longer need to stop at Farley. The consolidation of USPS operations at the Morgan Facility would decrease the total number of USPS trucks in the area, and increase the efficiency of its operations.

Based on trucking activity information from USPS, the consolidation of operations has resulted in about 931 daily truck trips no longer occurring at the Farley Complex, with an associated increase of about 243 daily truck trips to the Morgan Facility; a net loss of about 688 daily truck trips in the area. Focusing on the weekday peak hours, this represents decreases of 77, 44, and 64 truck trips during the AM, midday, and PM peak hours, respectively, at the Farley Complex. There are associated increases of 36, 3, and 16 truck trips, during the AM, midday, and PM peak hours, respectively, at the Morgan Facility. This is a weekday peak hour net reduction of 41, 41, and 48 truck trips during the AM, midday, and PM peak hours, respectively.

As a result of the relocation of postal operations from the Farley Building to the Morgan Facility, the overall volume of USPS trucking activity is expected to decrease as a result of the consolidation of operations. There will be a reduction in truck trips between the two buildings.

The analyses that were prepared as part of the 2003 SEA examined the street network in the vicinity of the Morgan Facility and included the change in truck and vehicular movements as a result of the consolidation of operations. Of the intersections examined for the 2003 EAS, the intersections of 28th, 29th and 30th Streets, with Eighth, Ninth, and Tenth Avenues would be the most likely to be affected by the USPS Morgan consolidation. That analysis showed that with two exceptions, none of those intersections surrounding the Morgan Facility that would experience increases in traffic as a result of the consolidation would experience adverse affects from the additional traffic. Two locations, the eastbound approach of the 30th Street/Ninth Avenue intersection during the AM peak, and the eastbound through movement of the 30th Street/Tenth Avenue intersection during the PM peak, were found to have significant increases in delay. It should be noted that both of these locations were projected to operate at LOS F under No Build conditions, and the analyses undertaken for the 2003 SEA, included not only traffic destined for the Morgan Facility, but also new traffic associated with the proposed changes at the Farley Complex redevelopment, as it was envisioned at the time. The small increases in traffic directly related to the consolidation of USPS operations at the Morgan Facility at these 2 locations, 3 trucks during the AM peak and 2 trucks during the PM peak would not have resulted in an impact by themselves.

However, for those two locations listed above, where the 2003 SEA analyses predicted that traffic conditions would significantly deteriorate, traffic system management measures, or traffic improvements, were proposed and their effectiveness examined. The traffic improvements examined for these two locations included the following:

AM PEAK HOUR

- 30th Street/Ninth Avenue intersection, eastbound approach: Reallocating 1 second of green time from the southbound movement to the eastbound movement; and

PM PEAK HOUR

- 30th Street/Tenth Avenue intersection, eastbound through movement: Change on-street parking regulations on the south side of the eastbound approach during the PM peak to

ban parking to allow for extra moving lanes. This increases the capacity of the roadway at the particular approach and is very effective.

As with any project, once it is completely operational field inspection of the operations at various intersections would be conducted to determine if the improvements proposed are warranted (particularly because traffic from anticipated No Build projects may be less than analyzed). Although not required, with the recommended project traffic system management improvements the Morgan consolidation would not result in any significant traffic impacts. It should also be noted that the traffic analyses for this current EIS are examining all of these same locations for potential impacts from the overall project as it is now envisioned.

The 2003 SEA found that there is still adequate off-street parking available to fill the needs of employees driving to the site. Additionally, since these are not new employees, and the consolidation is in the same area, no new demand would be expected from the consolidation, and the area is already providing parking for these workers. Therefore, the Morgan consolidation would not be expected to have any adverse effects on the area's parking supply.

TRANSIT AND PEDESTRIANS

Most of the employees associated with the consolidation are either in USPS vehicles (truck drivers, etc.) or are already traveling to this area by mass transit or walking. Based on field observations, the sidewalks around the Morgan Facility have ample capacity and would not be expected to be adversely impacted by the transfer of additional employees to this location. Because of the small numbers of peak hour employees that would be transferred to the Morgan facility, and the fact that none are new employees (who would likely continue to use the same bus and subway lines they use now), no transit or pedestrian impacts are expected from the consolidation.

AIR QUALITY

The 2003 SEA examined several receptor locations to determine the effects of the overall project, including the effects of the Morgan consolidation on air quality in the area (both carbon monoxide [CO] and particulate matter [PM] analyses were performed). Three receptors were chosen at locations near or adjacent to the Morgan Facility at: Ninth Avenue and 31st Street; Ninth Avenue and 29th Street, and Tenth Avenue and 29th Street in order to estimate the potential air quality impacts of the Morgan consolidation.

The resulting analyses indicated that the overall project (including the Morgan consolidation) would have no significant effect on the maximum predicted CO concentrations, that all incremental CO concentrations were within the City of New York's recommended *de minimis* guidelines, and there would be no significant adverse impacts or exceedances of the National Ambient Air Quality Standards (NAAQS). Therefore, since the results of those analyses indicated that there would be no significant adverse impacts or exceedance of the CO standard for the overall project, none would be expected to result from the Morgan consolidation.

An analysis was also performed as part of the 2003 SEA for the potential effect of PM emissions from the project-generated mobile sources on ambient levels of PM (PM₁₀ and PM_{2.5}) in the project study area, at the locations where the greatest potential for project-related increases in PM could occur (i.e., at locations near or adjacent to the Morgan Facility). The results indicated that the PM₁₀ concentrations in the project study area would be less than the corresponding National Ambient Air Quality Standards. Additionally, the 2003 SEA analyses found that the

Farley Post Office/Moynihan Station Redevelopment Project

maximum predicted 24-hour and annual-average incremental increase in $PM_{2.5}$ concentrations are very low, less than 0.1 percent of the NAAQS—an increment that is below the relative precision of the monitoring systems used to measure ambient $PM_{2.5}$. (See Chapter 15, Air Quality, for a more complete description of the NAAQS.) Furthermore, these predicted 24-hour and annual average increases are well below the NYCDEP and NYSDEC interim guidance criteria for determining significant impacts. Therefore, the project would not result in any significant adverse impacts with respect to PM_{10} or $PM_{2.5}$.

Therefore, based on the analyses previously performed, and the improvements and decreases in total truck movements associated with the Morgan consolidation (as discussed above), there would be neither significant PM impacts resulting from the changes in traffic from the Morgan consolidation nor would the Morgan consolidation create or exacerbate any exceedances of the PM NAAQS.

NOISE

Using the proportional noise modeling methodology described in Chapter 16, noise levels for Build conditions during the three weekday peak analysis periods were calculated for six receptor sites for the 2003 SEA. In addition, a noise screening analysis was performed, which looked at increases in vehicular traffic (auto and truck) around the Morgan Facility as a result of the Morgan consolidation, as compared to existing traffic.

The SEA analyses found that future noise levels were expected to increase by less than 1dBA, at all sites examined, and that at several sites, the future noise levels would decrease, due to the decrease in the number of heavy-duty trucks on specific streets. Changes of these magnitudes would be insignificant and imperceptible.

The noise screening analysis found that the increases in truck traffic would not result in any significant increases in noise levels on the streets surrounding the Morgan Facility. This is predominantly because the numbers of peak hour trucks directly related to the consolidation of USPS operations at the Morgan Facility are small (36 trucks during the AM peak, 3 during the midday, and 16 during the PM peak) relative to the number of trucks going to and from the Morgan Facility before the consolidation.

Therefore, no significant impacts to area noise levels would be expected as a result of the consolidation of USPS operations at the Morgan Facility.

CONSTRUCTION IMPACTS

There has been some minor construction activity related to consolidation of USPS operations at the Morgan Facility, including removal of outdated systems/equipment, upgrades to systems, and minor changes to interior loading dock areas. These activities have been completed, and as anticipated, all of these activities took place within the Morgan Facilities envelope and did not result in impacts outside, off-site, or to the operations at that facility. There would also be some additional minor construction activities related to consolidation of remaining administrative USPS functions that will transfer to the Morgan Facility from the Farley Complex, related to creating new office spaces for this staff. It is anticipated that all of these additional activities would also take place within the Morgan Facilities envelope and would not result in impacts outside, off-site, or to the operations at that facility. Therefore, the consolidation would not result in any significant adverse construction impacts. *