A. INTRODUCTION

This chapter considers the potential of the proposed Farley/Moynihan project to affect historic resources. It has been prepared in accordance with SEQRA, the New York State Historic Preservation Act of 1980 (SHPA), and Section 106 of the National Historic Preservation Act of 1966 (NHPA). These laws and regulations require that State and Federal agencies consider the effects of their actions on historic properties. In accordance with SEQRA guidelines, this analysis identifies all historic resources that have been designated or determined to meet the eligibility requirements for local, state, or national designation. This analysis assesses potential project effects on historic resources, and it follows the guidance of the *City Environmental Quality Review (CEQR) Technical Manual*.

The project site includes the superblock between Eighth and Ninth Avenues from West 31st to West 33rd Streets occupied by the James A. Farley Complex and the Pennsylvania Station rail yards. Formerly called the U.S. General Post Office, the James A. Farley Complex is a designated New York City Landmark (NYCL) that is also listed on the State and National Registers of Historic Places (S/NR). The project site also includes the Development Transfer Site on the east side of Eighth Avenue between West 33rd and 34th Streets that is occupied by three one-story retail buildings, a public open space, and a portion of a below-grade parking garage—this site would be redeveloped under project Scenario 2, as described in Chapter 2, "Analytical Framework."

Based on the conclusions of an Environmental Assessment (EA) prepared in 1999 and a *Summary of Historic Preservation Program Review: Pennsylvania Station Redevelopment Project, New York, New York* prepared by Hardy Holzman Pfeiffer Associates, Skidmore Owings and Merrill, and Building Conservation Associates, dated July 14, 1999, the Federal Railroad Administration (FRA) issued a finding of No Adverse Effect under Section 106 for the previous version of the station redevelopment project (described more fully in Chapter 1, "Project Description"). The current proposed project would modify elements of the previously approved station design and incorporate new elements into the redevelopment project. As a result, in addition to the SHPA review, new Section 106 reviews are being prepared for the proposed project. The USPS and the FRA are conducting ongoing Section 106 reviews—for the building transfer and for station funding, respectively—that will be completed prior to the Final Environmental Impact Statement (FEIS) for this project. The FRA Section 106 review relates only to the station portion of the proposed project. The Federal Highway Administration (FHWA) is also participating in the review of the proposed project, and will adopt the FRA's Section 106 findings. A Memorandum of Agreement (MOA) among the USPS, ESDC, the New York State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation (Advisory Council) is being prepared for the transfer of the building. The Section 106 processes and the finalized MOA will be summarized in the FEIS. Further, under Section 4(f) of the Department of Transportation Act of 1966 a Section 4(f) evaluation will be prepared

for the station portion of the proposed project, if the FRA determines that the proposed project includes a use of land upon a historic site of national, state, or local significance. FRA and FHWA will base their findings under Section 4(f) on the information contained in the EIS and their consultation with SHPO.

Historic resources include both archaeological and architectural resources. The study area for archaeological resources would be the area disturbed for project construction, the project site itself. In September 1994, an Archaeological Sensitivity Study was prepared for the Farley Complex site. Based on the conclusions of that study and in consultation with the New York State Office of Parks, Recreation and Historic Preservation (OPRHP), acting in its capacity as the SHPO, the FRA determined that the Farley Complex site is not sensitive for archaeological resources due to prior subsurface disturbance. Similarly, the Development Transfer Site would not be sensitive for archaeological resources, because it is built over a multi-level below-grade parking garage. Therefore, no further consideration of archaeological resources is warranted. Following guidelines in the *CEQR Technical Manual*, the study area for architectural resources is defined as being within an approximately 400-foot radius of the Farley Complex and the Development Transfer Site (see Figure 8-1). Within the study area, architectural resources analyzed include S/NR properties or properties determined eligible for S/NR listing, National Historic Landmarks (NHLs), NYCLs and Historic Districts, and properties determined eligible for NYCL status.

PRINCIPAL CONCLUSIONS

SCENARIO 1

PHASE I

It is not expected that development of Phase I of the proposed project would have significant adverse impacts on the Farley Complex. The adaptive reuse of the structure and the restoration program would have overall beneficial effects on the Farley Complex, which would become a vibrant mixed-use facility with a new train station reminiscent of the original Pennsylvania Station. Although the architectural design of the new station spaces, commercial facilities, and the pedestrian corridor would be modern, the final design of Phase I would be developed in consultation between the preferred developer, ESDC/MSDC, and OPRHP to ensure compatibility with the historic character of the structure. In addition, construction protection measures would be developed and implemented in consultation with OPRHP to avoid adverse impacts on the Farley Complex exterior and the interior spaces to be preserved as part of the proposed project.

However, where any potential adverse impacts on the Farley Complex are identified, mitigation will be developed by the preferred developer and ESDC/MSDC and stipulated in a Letter of Resolution (LOR) to be executed with OPRHP. Such mitigation could include specifications for the treatment of affected historic features and the general requirement that ongoing consultation will occur as the design develops. The LOR will be executed prior to completion of the FEIS for the proposed project, and it will be summarized in the FEIS.

No adverse visual or contextual impacts on surrounding architectural resources are expected from Phase I of the proposed project. To avoid adverse construction impacts on three resources (the Glad Tidings Tabernacle, the J.C. Penney Company building, and the William F. Sloan

Memorial YMCA) across West 33rd Street from the Farley Complex, a construction protection plan would be developed.

PHASE II

While the commercial use of the overbuild proposed by Developers A and B would be consistent with the overall adaptive reuse of the Farley Complex, a building constructed above it would have adverse visual and physical impacts on the architectural resource. Therefore, the final design of the overbuild would be developed in consultation with OPRHP, along with a construction protection plan. Any mitigation measures would be stipulated in the LOR that will be executed among the preferred developer, ESDC/MSDC, and OPRHP.

Since construction of an overbuild above the Farley Complex could cause inadvertent adverse physical impacts to architectural resources located within 90 feet of construction activities, a construction protection plan would be developed and implemented for three resources (the Glad Tidings Tabernacle, the J.C. Penney Company building, and the William F. Sloan Memorial YMCA) located directly across West 33rd Street.

It is not expected that development of an overbuild atop the Western Annex would have adverse contextual or visual impacts on any of the architectural resources located in the study area, because the use, height, and design of the overbuild would be in keeping with the character of development in the study area. In addition, as described in Chapter 7, "Shadows," the proposed overbuild would not have adverse shadow impacts on architectural resources with sunlight-dependent features, including the Farley Complex. Further, the proposed overbuild would not eliminate or screen publicly accessible views of a resource, isolate an architectural resource from or alter its visual relationship with the streetscape, or introduce an incompatible visual element to a resource's setting.

SCENARIO 2

Under Scenario 2, Phase I of the proposed project—redevelopment of the Farley Complex with a new station and commercial uses—would have the same effects on the Farley Complex as under Scenario 1.

It is not expected that a new building on the Development Transfer Site would have adverse physical impacts on architectural resources. There are no architectural resources located within 90 feet of the site, close enough to experience inadvertent construction damage from ground-borne construction-period vibrations, subsidence, collapse, or other accidental damage.

A new building on the Development Transfer Site is also not expected to have adverse visual or contextual impacts on architectural resources. It would be in keeping with the mixed-use character of the study area and would be similar in height, massing, and design to One Penn Plaza and the development projected for construction on Ninth Avenue on the Hudson Yards Projected Development Site 33. The proposed building would not eliminate or screen significant publicly accessible views of a resource, isolate an architectural resource from or alter its visual relationship with the streetscape, or introduce an incompatible visual element to a resource's setting. Further, construction of an off-site building rather than an overbuild with the unused development rights has been proposed to preserve the architectural integrity of the Farley Complex. Although the new building would eliminate some existing views of the Farley Complex from the public plaza on the Development Transfer Site, the Farley Complex would continue to be prominent in views from Eighth Avenue. The Development Transfer Site building

would also not have any adverse shadow impacts on architectural resources with sunlight-dependent features.

B. METHODOLOGY

OVERVIEW

In general, potential impacts on architectural resources can include both direct physical impacts and indirect impacts. Direct impacts could include demolition of a resource, alterations to a resource that cause it to become a different visual entity, damage from vibration (e.g., from construction blasting or pile driving), and additional damage from adjacent construction that could occur from falling objects, subsidence, collapse, or damage from construction machinery.

Indirect impacts are contextual or visual impacts that could result from project construction or operation. As described in the *CEQR Technical Manual*, indirect impacts could result from blocking significant views of a resource; isolating a resource from its setting or relationship to the streetscape; altering the setting of a resource; introducing incompatible visual, audible, or atmospheric elements to a resource's setting; or introducing shadows over a historic landscape or an architectural resource with sun-sensitive features that contribute to that resource's significance, such as a church with notable stained-glass windows.

Adverse direct or indirect impacts can occur if a project would cause a change in the quality of a property that qualifies it for listing on the Registers or for NYCL designation. To assess the potential effects of the proposed project, an inventory of architectural resources in the study area that could be affected by the project was compiled based on the methodology described below.

STUDY AREA (THE AREA OF POTENTIAL EFFECT)

The first step in identifying potential effects to architectural resources was to define the study area or the Area of Potential Effect (APE), based on the area for potential construction-period effects, such as ground-borne vibrations, and on an area for potential visual or contextual effects, which is usually a larger area. Following the guidelines of the New York City Department of Buildings *Technical Policy and Procedure Notice (TPPN) #10/88*, regarding procedures for the avoidance of damage to historic structures resulting from adjacent construction, the APE for construction effects is defined as being within 90 feet of construction activities—the range in which construction-period vibration could accidentally damage an architectural resource. That APE was expanded to account for visual and contextual effects, and since views to the Farley Complex and Development Transfer Site are generally limited to the immediately surrounding streets due to the density of surrounding development, the architectural resources study area is defined as the area within 400 feet of the Farley Complex and Development Transfer Site (Figure 8-1).

CRITERIA AND REGULATIONS

Once the study area was determined, an inventory of officially recognized ("designated and eligible") architectural resources was compiled. These resources include properties or districts listed on the S/NR or determined eligible for such listing; National Historic Landmarks (NHLs); NYCLs and Historic Districts; and properties that have been found by the New York City Landmarks Preservation Commission (LPC) to appear eligible for designation, considered for

designation ("heard") by the LPC at a public hearing, or calendared for consideration at such a hearing (these are "pending" NYCLs).

Criteria for listing on the National Register are in the Code of Federal Regulations, Title 36, Part 63, and the LPC and the OPRHP have adopted these criteria for use in identifying architectural resources for CEQR and SEQRA review. Following these criteria, districts, sites, buildings, structures, and objects are eligible for the National Register if they possess integrity of location, design, setting, materials, workmanship, feeling, and association, and: 1) are associated with events that have made a significant contribution to the broad patterns of history (Criterion A); 2) are associated with significant people (Criterion B); 3) embody distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction (Criterion C); or 4) may yield [archaeological] information important in prehistory or history. Properties that are younger than 50 years of age are ordinarily not eligible, unless they have achieved exceptional significance. Determinations of eligibility are made by the OPRHP.

In addition, the LPC designates historically significant properties in the City as NYCLs and/or Historic Districts, following the criteria provided in the Local Laws of the City of New York, New York City Charter, Administrative Code, Title 25, Chapter 3. Buildings, properties, or objects are eligible for landmark status when a part is at least 30 years old. Landmarks have a special character or special historical or aesthetic interest or value as part of the development, heritage, or cultural characteristics of the city, state, or nation. There are four types of landmarks: individual landmark, interior landmark, scenic landmark, and historic district.

In addition to identifying architectural resources officially recognized in the study area, a field survey was undertaken, in accordance with CEQR guidelines, to identify potential architectural resources (i.e., those that appear to meet one or more of the National Register criteria) within 400 feet of the Farley Complex and Development Transfer Site. No potential architectural resources were identified in the study area.

Once the architectural resources in the study area were identified, the proposed project was assessed for both direct physical impacts and indirect visual and contextual impacts on architectural resources.

C. EXISTING CONDITIONS

PROJECT SITE

FARLEY COMPLEX

Significant under National Register Criterion C in the area of architecture, the James A. Farley Complex consists of two connected structures—the original U.S. General Post Office building (renamed the James A. Farley Building in 1982) and the Western Annex. Built between 1910 and 1913 over a portion of the Pennsylvania Station Rail Yard, the Farley Building covered only the eastern half of the block, with the primary façade facing Eighth Avenue and the original Pennsylvania Station, which was begun in 1902 and completed in 1910. The Western Annex expanded the complex over the western half of the block to Ninth Avenue in 1934. The four-story (120-foot-tall) Farley Complex is a monumental, freestanding Classical Revival-style

building designed to be seen from all sides, and both sections form a coherently designed whole. The Farley Complex is described in detail below.

Farley Building

As early as 1904, track layout plans for Pennsylvania Station indicated a future postal facility on the air rights over the tracks, and the Farley Building was planned to utilize the tracks below for postal operations. Having won the commission in a competition, the firm of McKim, Mead & White designed the monumental granite building as a companion to the original Pennsylvania Station (demolished in 1963–1964), which was located directly across Eighth Avenue. The Farley Building's form is that of a monumental Corinthian temple with a peristyle set on a high podium (see view 1 of Figure 8-2), and the building plan consists of four office blocks around a central skylight-covered atrium originally used as a general work floor. Above the attic story, there is a set back penthouse floor that rings the atrium. The penthouse floor has a copper roof visible from certain locations along Eighth Avenue. Besides space for mail sorting and distribution uses, the Farley Building contains public lobbies, retail windows, administration spaces, and the office of the New York City Postmaster. The building also has existing connections to platforms of Penn Station below.

Each façade of the Farley Building is articulated with a central colonnade framed by heavy corner pavilions. (The original west façade is not visible, and a large portion of it was removed for construction of the Western Annex.) An entablature and projecting cornice encircling the building below an attic story further unifies the design. Beginning in front of the corner pavilions on Eighth Avenue, there are moats adjacent to the north and south façades of the Farley Building. Tall stone walls border the moats, which have concrete floors. The moats originally contained a floor system of glass blocks set in a steel frame that provided light to the tracks below.

Once corresponding to the main façade of the original Pennsylvania Station, the Eighth Avenue façade (the primary façade) is a shallow portico raised high above the street and reached by a wide flight of stairs (see view 1 of Figure 8-2). The portico consists of twenty 53-foot-tall, fluted Corinthian columns supporting the entablature. An inscription in the frieze reads, "Neither snow nor rain nor heat nor gloom of night stays these couriers from the swift completion of their appointed rounds." The wall behind the columns is punctured with monumental steel entrance doors and windows with Classical-style details. Windows with heavy architraves are located in the attic story.

The Eighth Avenue corner pavilions have symmetrical avenue and street façades. Corinthian pilasters frame the corners, and large panels with inscriptions are found on the attic story (see view 2 of Figure 8-2). On Eighth Avenue, each corner pavilion has a half-domed niche on the piano nobile level, a tripartite window located above the niche, and three windows in the moat level. On the street façades of the corner pavilions, arched entrances correspond to the niches on the avenue façades, and there are tripartite windows above the entrances. Recessed within the arched openings, the entrance doors are steel with fanlight forms. Tall flights of steps lead to the side entrances. Capping each corner pavilion is a low stone, stepped pyramid.

The colonnaded West 31st and 33rd Street façades are articulated with alternating Corinthian pilasters and recessed window bays (see Figure 8-3). The pilasters have heavy capitals similar to those used on the Eighth Avenue corner pavilions. The window bays contain double-height wooden windows with smaller ones above at the level of the pilaster capitals. Deeply recessed windows are located at the moat level, and the attic story contains windows with heavy

architraves. The southwest and northwest corner pavilions are identical to the Eighth Avenue corner pavilions—they contain arched recessed openings, tripartite windows, and inscribed panels located above the entablature (see Figure 8-4). On all four of the Farley Building corner pavilions, the inscriptions refer to historical figures associated with mail operations. The southwest and northwest arched openings currently serve as entrances, but when the corner pavilions were constructed they did not contain entrances. The arched openings originally functioned as windows raised above the moat. Doors were inserted and walkways added most likely when the annex was built in 1934.

Originally, terra cotta cresting capped the Farley Building at the parapet. This cresting is completely missing above the Eighth Avenue portico and is missing in sections on the north and south (street) façades. A glaring modern addition to the Farley Building is the system of cobra-head lights projecting from the façades above the entablature (see view 1 of Figure 8-2). Additional modern alterations include several boxy mechanical penthouses located on the roof, which are visible from Eighth Avenue, and metal louvers inserted into some of the windows along the north and south façades.

The Eighth Avenue façade is currently being restored with an anticipated schedule of twelve to eighteen months. The restoration program includes cleaning and repointing the granite, restoring the metal window wall behind the colonnade, replacing the terra cotta cresting, and removing the modern cobra-head lighting.

On the Farley Building interior, the main USPS retail lobby is a long publicly accessible room that runs behind the main colonnade and ends at side lobbies. Decorative metal entrance kiosks are located at every other bay between the columns, and they alternate with high marble tables. Bronze retail windows line the wall opposite the entrance façade. The retail lobby wall surfaces are ornamented with marble pilasters capped by plaster capitals. The high plaster ceiling is decorated with neoclassical motifs. The side lobbies are set at right angles to the retail lobby. Features of the side lobbies include blind niches and additional retail windows. The side lobbies connect the retail lobby to rotundas within the Eighth Avenue corner pavilions. The rotundas have domed ceilings with plaster neoclassical reliefs and wall niches. At the west side of each rotunda is a monumental stair leading to the upper floors of the Farley Building. Further, each rotunda contains a mural painted by Louis Lozowick in 1935—“Lower Manhattan” shows the harbor and skyline and “Triboro Bridge” illustrates construction of that bridge. The north rotunda also contains war memorial plaques. The central Farley Building atrium (the former work room) is not publicly accessible, and a renovation in the 1950s altered the original space. A mezzanine floor was added that divided the formerly large, open room. Additionally, partitions have been added to the skylight truss system that was never fully visible because of enclosed catwalks and observation corridors.

Western Annex

Constructed in 1934, the Western Annex extended the U.S. General Post Office facility to Ninth Avenue. Also designed by McKim, Meade & White, it is a fully integrated addition to the original structure, with much of the interior space used for truck loading and unloading. Like the Farley Building, the Western Annex has façades composed of colonnades framed by heavy corner pavilions, and the entablature on the earlier structure is continued around the annex (see view 7 of Figure 8-5). The terra cotta cresting also encircles the annex, but it is missing in numerous places. The corner pavilions of the Western Annex are almost identical to those of the Farley Building—they are designed with Corinthian pilasters, large arched windows that correspond to the arched entrances and niches on the Farley Building pavilions, and tripartite

windows set below the entablature (see view 8 of Figure 8-5 and view 9 of Figure 8-6). Instead of inscribed panels at the attic story, there are windows. Stone stepped pyramids cap the Ninth Avenue corner pavilions.

Stylistic differences that distinguish the Western Annex from the Farley Building noticeably occur at the colonnades (see view 7 of Figure 8-5, view 10 of Figure 8-6, and view 11 of Figure 8-7). Between the corner pavilions, the entablature along Ninth Avenue and West 31st and West 33rd Streets is less detailed, lacking the dentils and molding bands that ornament the entablature on the Farley Building and the corner pavilions of both structures. While the façades repeat the colonnade motif, the pilasters have stylized representations of Corinthian capitals. The window bays between the pilasters contain no masonry wall surface, as recessed metal windows fill the entirety of the bays below the entablature. At the attic story, there are windows with heavy stone architraves.

On Ninth Avenue, three large attached arches mark the center of the façade (see view 12 of Figure 8-7). These arches have elaborately molded archivolts and spandrels and inset metal window systems. At ground level, the arches function as truck and pedestrian entrances. Large lanterns are attached to the façade outside the arches, and a sculptural relief group rests on the entablature above. On West 33rd Street, there is an adjacent moat and a building entrance located at the center of the façade. At this location, there are three entrances set within the recessed window bays of the colonnade—these entrances consist of metal doors framed by stone pilasters that support small entablatures (see view 13 of Figure 8-8). Large metal lanterns identify the entrances. In the lobby of this entrance is a highly deteriorated mural painted by Frederico ("Rico") Lebrun between 1936 and 1938. Titled "Post Office in the County", the mural was not completed and showed signs of peeling by 1942. However, as written in a letter dated May 3, 2005 OPRHP has determined that the mural is a contributing element to the Farley Complex. On West 31st Street, a row of back-in loading docks forms the ground floor of the colonnade (see view 11 of Figure 8-7). Projecting stone walls frame the bank of loading docks.

The connecting sections between the Farley Building and the main bulk of the Western Annex are wide recessed bays. These sections differentiate the two halves of the Farley Complex, while repeating, with variations, the classical motifs of the structure. On West 31st Street, the moat continues in front of the connecting bay, which is designed with a façade similar to that of the corner pavilions. The connecting bay is composed of three arched windows framed by Corinthian pilasters, tripartite windows set below the entablature, and an attic story with windows and terra cotta cresting at the parapet (see view 5 of Figure 8-4). On West 33rd Street, the connecting bay contains two large truck entrances set within arched openings (see view 14 of Figure 8-8). The arches are detailed with molded archivolts, carved spandrels, and scrolled keystones. Corinthian pilasters frame the arched openings, above which are tripartite windows. The building entablature continues across the connecting bay.

Alterations to the Western Annex include missing sections of the terra cotta cresting, boarded windows on the West 31st Street and Ninth Avenue façades, and metals louvers inserted into various window openings on the three façades. In addition, there are several boxy mechanical bulkheads on the roof that are visible from Ninth Avenue. These bulkheads appear to be built with concrete and corrugated metal sheeting.

DEVELOPMENT TRANSFER SITE

Three one-story buildings and a public open space occupy the Development Transfer Site. Constructed in 1972 as part of the One Penn Plaza development, the retail buildings and public plaza do not appear to possess any architectural or historical significance.

STUDY AREA

In addition to the Farley Complex, there are fifteen architectural resources located in the project study area (see Table 8-1 and Figure 8-1). Many of them were identified and subsequently determined eligible for NYCL designation and/or S/NR listing through the environmental review process for the Hudson Yards Rezoning and Redevelopment Project.

Table 8-1
Architectural Resources

Map Ref. #	Name/Type	Address	NYCL	S/NR	NYCL-eligible	S/NR-eligible
1	Farley Complex	Block bounded by Eighth and Ninth Avenues and 31st and 33rd Streets	X	X		
2	Loft Building	424 West 33rd Street				X
3	St. Michael's RC Church Complex	414-424 West 34th Street and 409-429 West 33rd Street			X	X
4	Cheyenne Diner	411 Ninth Avenue				X
5	William F. Sloan Memorial YMCA	360 West 34th Street			X	X
6	Former J.C. Penney Co.	331-343 West 33rd Street				X
7	Glad Tidings Tabernacle	325-329 West 33rd Street			X	X
8	Loft Building	406-426 West 31st Street				X
9	Penn Station Service Building	236-248 West 31st Street			X	X
10	West Side Jewish Center	347 West 34th Street				X
11	Former Manhattan Opera House	311 West 34th Street			X	X
12	New Yorker Hotel	481-497 Eighth Avenue			X	X
13	Morgan General Mail Facility					X
14	Former French Hospital	326 West 30th Street				X
15	Pennsylvania Building	225 West 34th Street			X	X
16	Hoover Building	501-507 Eighth Avenue				X

LOFT BUILDING (S/NR-ELIGIBLE)

Paul Hunter designed the 12-story loft building at 424 West 33rd Street, which was built in 1912–1913 for the printing trades. The building's developer selected the site overlooking the Penn Station Rail Yard on the south to ensure ample unobstructed light to the building's interior. The West 33rd Street façade has a two-story rusticated stone base with pilasters, and the upper floors of wide window bays are clad in tan brick (see view 15 of Figure 8-9). A terra cotta belt course, brackets, and cornice decorate the top floors. The south façade, overlooking the rail yard, has the same articulation of window bays and piers, but the brick is not decorative face brick. This loft building is significant under Criterion A in the areas of commerce and industry. As an intact example of printing loft design, it also meets Criterion C in the area of architecture.

ST. MICHAEL'S ROMAN CATHOLIC CHURCH (NYCL-ELIGIBLE, S/NR-ELIGIBLE)

St. Michael's Roman Catholic Church was originally located on the site of the current open cut of the Penn Station Rail Yard. On the condition that the Pennsylvania Railroad would build a new facility nearby, the church sold its original buildings to accommodate construction of the Penn Station complex. In 1905-1906, the Pennsylvania Railroad built the current church complex at 414-424 West 34th Street and 409-429 West 33rd Street. Designed by Napoleon LeBrun & Sons, the complex consists of a church and rectory that front on West 34th Street, and

a school, convent, and vestry that front on West 33rd Street (see view 16 of Figure 8-9). The through-block church is a limestone Romanesque Revival structure. The primary façade fronts on West 34th Street and is faced in rough ashlar stone (see view 17 of Figure 8-10). The church's south façade is faced in smooth limestone blocks, and its defining features are a blind arched window in the center and two pinnacled turrets framing the gable.

The five-story brick rectory is adjacent to the west of the church at 424 West 34th Street. It exhibits a unique mixture of Gothic and Romanesque Revival elements that include a corbelled archivolt over the entrance arch, windows with limestone colonnette mullions and architraves with hood-moldings and carved label stops, and three limestone, gabled dormer windows. On West 33rd Street, the vestry (409 West 33rd Street), the convent (417 West 33rd Street), and the school (421-429 West 33rd Street) exhibit the same mix of Gothic and Romanesque Revival details as the rectory. All three are brick with limestone bases, window architraves, and corbelled cornices, and they all have copper dormer windows (see view 16 of Figure 8-9). Unique details of the three-story brick vestry include a large limestone, peaked-roof porch with an arched entrance capped by a corbelled archivolt resting on colonnettes, and two dormer windows with trefoil tracery in the gables. The school has squat corner towers. The church complex is eligible for listing on the Registers under Criterion A for its association with the historical development of Hell's Kitchen and under Criterion C for its architectural design. LPC has determined that the church complex also appears to be eligible for NYCL designation.

CHEYENNE DINER (S/NR-ELIGIBLE)

The Cheyenne Diner at 411 Ninth Avenue is located across the West 33rd Street intersection from the Farley Complex. Built by Paramount Diners in 1940 (Abraham Fisher, architect), it is a one-story, stainless steel diner with porcelain panels. Shaped like a train car, the two street façades consist of stainless steel windows placed above rounded porcelain panels (see view 18 of Figure 8-10). Located at the southeast corner, the rounded entrance consists of a recessed door framed by curved glass-block panels. A streamlined cornice encircles the building. Neon signs composed of freestanding letters are placed above the two sides of the entrance. The diner is S/NR eligible under Criterion A for its association with the historical development of Hell's Kitchen and under Criterion C in the area of architecture.

WILLIAM F. SLOAN MEMORIAL YMCA (NYCL-ELIGIBLE, S/NR-ELIGIBLE)

Cross & Cross designed the through-block William F. Sloan Memorial Branch of the YMCA located at 360 West 34th Street immediately across West 33rd Street from the Farley Complex. Built in 1929-1930 and named for William Sloan, the chairman of the National War Council of the YMCA during the First World War, the building originally functioned to provide social facilities and sleeping accommodations for men in the armed services. The 14-story brick building is designed in the neo-Georgian style, and it is massed with projecting pavilions and upper floor setbacks (see Figure 8-11). The two-story base has a limestone ground floor that contains entrances with broken segmental pediments and a second floor with round-arched windows with stone keystones. A central light court on the West 34th Street façade creates corner pavilions. Stone detailing includes quoins, string courses, window keystones and voussoirs, balustrades, cartouches, and pediments that form the crowns of the corner pavilions. The south façade is similar in detailing, but it does not use setbacks. Abutting a three-story building on Ninth Avenue, the west façade carries the design of the north and south façades and also utilizes the corner pavilion motif. This building meets National Register Criterion A for its

association with the area's historical development and Criterion C for its architectural design. LPC has determined that this building also appears to be eligible for NYCL designation.

FORMER J.C. PENNEY COMPANY (S/RN-ELIGIBLE)

The J.C. Penney Company constructed the 18-story building at 330 West 34th Street and 331-343 West 33rd Street in 1925–1926 for offices and a plant for manufacturing packing cases. The building also originally contained an office for the American Express Company solely devoted to J.C. Penney express shipments. Adjacent to the east of the former YMCA building, it sits across West 33rd Street from the Farley Complex. Schultze & Weaver designed the building as a large Italian palazzo, and its solid and rectilinear bulk is slightly relieved by a series of two setbacks beginning at the 12th floor on the north façade and a series of four setbacks beginning at the seventh floor on the south façade (see view 19 of Figure 8-11). The north and south façades are similarly designed, but the north façade is the primary one. On the north façade, the three-story rusticated base is faced in stone and has two large arched entrances; the 12th floor is designed as a large, bracketed stone cornice with arched windows in the gaps between the brackets; a stone balustrade forms the parapet of the second setback; and the top floor takes the form of an attic story clad in stone with carved piers (see view 21 of Figure 8-12). On the south façade facing the Farley Complex, the attic story and balustrade appear, but there is no bracketed cornice at the first setback, and the rusticated base is clad in brick. In addition, there are ground-floor loading docks on West 33rd Street. This building meets National Register Criterion A for its association with commercial development around the original Pennsylvania Station and Criterion C for its architectural design.

GLAD TIDINGS TABERNACLE (NYCL-ELIGIBLE, S/NR-ELIGIBLE)

The Romanesque Revival-style Glad Tidings Tabernacle at 325-329 West 33rd Street was erected between 1854 and 1859 as the home of the Pilgrim Baptist Church. Facing the Farley Complex, it is a symmetrical structure with two corner towers and a recessed nave with three central, round-arched entrances (see view 22 of Figure 8-12). There are also round-arched entrances in the bases of the towers. A large arched window (behind which are the living quarters for the resident priest) is located in the center of the nave façade, and tall arched windows and roundels are located on the tower façades. Stone architraves with Italianate details frame the openings in the structure, and a round-arched corbelled brick cornice emphasizes the pitched roofline of the nave. Ogee-shaped pinnacles cap the towers. A large neon cross projects from the east tower. The church building is S/NR-eligible under Criterion A for its association with the historical development of Hell's Kitchen and under Criterion C for its architectural design. LPC has determined that this church building also appears to be eligible for NYCL designation.

LOFT BUILDING (S/NR-ELIGIBLE)

Designed by Edward L. Larkin and built in 1914, the large loft building at 406-426 West 31st Street overlooks the Penn Station Rail Yard to the north. Erected for the printing trades, it is a 15-story building with a wide 250-foot frontage. The West 31st Street façade has a three-story, rusticated stone base and upper floors clad in tan brick. The shaft is articulated with thin brick piers and numerous, regularly spaced windows that originally served to provide ample light to the printing floors (see view 23 of Figure 8-13). Terra cotta pilasters and decorative panels embellish the upper three floors. The east and west façades are largely blank brick, while the south façade overlooking West 30th Street and an entrance to Dyer Avenue and the Lincoln

Tunnel has the same repetition of numerous windows as the north façade. The south façade, however, is not clad in decorative face brick. The Fashion Institute of Technology is currently converting the building into a dormitory. It is S/NR-eligible under Criterion A in the area of commerce/industry and under Criterion C in the area of architecture as an intact example of printing loft design.

PENNSYLVANIA STATION SERVICE BUILDING (NYCL-ELIGIBLE, S/NR-ELIGIBLE)

Located at 236-248 West 31st Street across from Madison Square Garden, the Pennsylvania Station Service Building was built in 1908, two years before the completion of the old Pennsylvania Station, which was located directly to the north. McKim, Mead & White designed the structure to supply electricity to the engines going in and out of the station and compressed air for braking and signaling mechanisms. It also generated heat and light for the station. The five-story building is a simple Classical structure clad in the same granite of which the station had been constructed (see view 24 of Figure 8-13). The façade is divided into a large three-story section set on a plinth and capped with a projecting stone cornice, and an attic story with windows. Across the main portion of the façade, double-height Doric pilasters alternate with windows secured with iron grills. The attic story is surmounted by a stone cornice that is smaller and less elaborately molded than the one above the base. The building meets National Register Criterion C in the areas of architecture and engineering. LPC has determined that it also appears to be eligible for NYCL designation.

WEST SIDE JEWISH CENTER (S/NR-ELIGIBLE)

In 1924, Congregation Beth Israel built the West Side Jewish Center at 347 West 34th Street to house an auditorium, synagogue, classrooms and reading rooms, and a cellar gymnasium. Designed by Gronenberg & Leuchtag, it is a three-story limestone Romanesque Revival building (see view 25 of Figure 8-14). The focal point of the exterior design is a large, round-arched opening in the center of the façade. The archivolt of the arch is sculpted with two colonnettes whose forms are carried across the intrados of the arch as rounded ribs. A pedimented temple-front window is set within the arch, and stained glass is used for much of the glazing within the opening. At the building base, there is a double-arched entrance. Fluted colonnettes support the arch ribs, and stained glass is set in the tympanums above the entrance doors. The top floor is gabled and designed with a round-arched wall arcade, a round-arched corbelled cornice, and a sculpture group of two lions holding a Torah. Two arched stained glass windows are located on the west side of the building, overlooking an adjacent parking lot. The synagogue building meets National Register Criterion A for its association with the historical development of Hell's Kitchen and Criterion C for its architectural design.

FORMER MANHATTAN OPERA HOUSE (NYCL-ELIGIBLE, S/NR-ELIGIBLE)

Designed by William E. Mowbray to resemble an Italian palazzo, the former Manhattan Opera House at 311 West 34th Street was constructed between 1901 and 1907 for producer Oscar Hammerstein, who sought to compete with the Metropolitan Opera. The nine-story, brick-and-stone building is set on a two-story rusticated stone base that has five arched entrances (see view 26 of Figure 8-14). The main body of the building, in keeping with its original function as a performance space, is largely solid surface. There are, however, five bays of small windows in the center of the façade. On the sixth-floor, arched double-windows have stone colonnette mullions and stone tympanums, and stone balconies with decorative panels are located below each of the double-windows. The top portion of the building is designed as an attic story. In

1923, the building was altered for the New York Freemason group, the Ancient Accepted Scottish Rite of Free Masonry. Their name is still inscribed in the frieze above the base. A modern canopy is attached to the ground floor. The former opera house meets National Register Criterion A for its association with the historical development of Hell's Kitchen and Criterion C for its architectural design. LPC has determined that the former opera house also appears to be eligible for NYCL designation.

NEW YORKER HOTEL (NYCL-ELIGIBLE, S/NR-ELIGIBLE)

The New Yorker Hotel at 481-497 Eighth Avenue was constructed in 1928–1930 to designs by Sugarman & Berger. The bold massing of the 43-story, brick-and-stone building is the most significant feature of its design. Corner towers rise in a series of deep setbacks to the central tower, which has a form accented by deep light courts on each of its façades (see view 27 of Figure 8-15). On the north and south façades, there are two light courts that create a central pavilion flanked by the corner towers; on the Eighth Avenue façade, there is only one central light court. Most of the brick wall surface, above the stone base, is simply articulated with vertical bands of windows. Art Deco ornamentation is found in carved stone blocks at the parapet of each setback, in panels above the fourth-floor windows, and on the base. After having housed the national headquarters of the Holy Spirit Association for the Unification of World Christianity (Unification Church) for almost thirty years, the building now functions again as a hotel. It meets National Register Criterion A for its association with the commercial development around the original Pennsylvania Station and Criterion C for its architectural design. LPC has determined that the hotel building also appears to be eligible for NYCL designation.

MORGAN GENERAL MAIL FACILITY (S/NR-ELIGIBLE)

The ten- and six-story USPS Morgan General Mail Facility 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 (see view 28 of Figure 8-15). 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, 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.

FORMER FRENCH HOSPITAL (S/NR-ELIGIBLE)

Designed by Crow, Lewis & Wickenhaefer, the brick, stone, and terra cotta French Apartments building at 326-330 West 30th Street and 329 West 29th Street was formerly the French Hospital. The George A. Fuller Company constructed the 12-story, Classical Revival building in 1928–1929 for the French Benevolent Society, founders of the hospital. The building was the fourth non-sectarian hospital operated by the society. The hospital performed outpatient work and provided children's and maternity services, and the building included a residence and

training school for nurses. The hospital building's primary (West 30th Street) façade is composed of a central portion set back from the street and two corner pavilions (see view 29 of Figure 8-16). A two-story projecting entrance pavilion is ornately designed with fluted Corinthian pilasters, windows with segmental pediments and tympanums carved with foliate designs, ornamental balconies, carved swags, and a balustrade. The words "Societe Française De Bienfaisance" are engraved in the frieze. Above the entrances to the corner pavilions are a carved sign that reads "Clinic Entrance" and a mortar and pestle set in a wreath. The building is ornamented with additional Classical Revival details. The West 29th Street façade is similar in design. The former hospital building meets Criterion C as an example of Classical Revival-style institutional architecture, and it may also meet Criterion A in the areas of health, medicine, and social history.

PENNSYLVANIA BUILDING (NYCL-ELIGIBLE, S/NR-ELIGIBLE)

Julius Tishman and Sons Incorporated built the 22-story Pennsylvania Building at 225 West 34th Street in 1924–1925. Located near Penn Station and in the center of the garment district, it originally housed insurance firms, garment businesses, trade organizations, real estate firms, and, on the ground floor, banks. Schwartz & Gross designed the building in a Byzantine style with upper-floor loggias and Moorish foliated arches. The three-story stone base has a large arched entrance framed with marble columns, two floors of showroom windows, elaborately carved stone panels and a frieze, and a cornice line of stepped pinnacle forms. A slightly projecting central bay rises almost the entire height of the building. Cornices of corbelled arches decorate the parapets of the upper setbacks. This building meets National Register Criterion A for its association with commercial development around the original Pennsylvania Station and Criterion C for its architectural design. LPC has determined that it also appears to be eligible for NYCL designation.

HOOVER BUILDING (S/NR-ELIGIBLE)

The Hoover Building at 501-507 Eighth Avenue is a 25-story Art Deco garment loft building. Designed by Chester James Storm, it was built in 1929–1930. Most of the building is clad in light-colored brick and articulated with bays of three window columns flanked by brick piers. Brick spandrel panels provide some ornamentation to the shaft. Above the modernized ground floor, the four-story showroom base is clad in richly patterned terra cotta. The upper floors rise in a series of setbacks and are ornamented with Art Deco stone details and cornices of corbelled brick arches. This building is S/NR-eligible under Criterion A in the area of commerce/industry and under Criterion C in the area of architecture as an intact example of garment loft design.

D. FUTURE WITHOUT THE PROPOSED ACTION: 2010

In the future, the status of architectural resources could change. S/NR-eligible architectural resources could be listed on the Registers, NYCL-eligible properties could be calendared for a designation hearing, and properties pending designation as Landmarks could be designated. It is also possible, given the project's completion years of 2010 and 2015, that additional sites could be identified as architectural resources and/or potential architectural resources in this time frame.

Changes to the architectural resources identified above or to their settings could occur irrespective of the proposed project. Future projects could also affect the settings of architectural resources. It is possible that some architectural resources in the study area could deteriorate,

while others could be restored. In addition, future projects could accidentally damage architectural resources through adjacent construction.

Architectural resources that are listed on the S/NR or that have been found eligible for listing are given a measure of protection under Section 106 of the NHPA from the effects of projects sponsored, assisted, or approved by federal agencies. Although preservation is not mandated, federal agencies must attempt to avoid adverse effects on such resources through a notice, review, and consultation process. Properties listed on the Registers are similarly protected against effects resulting from projects sponsored, assisted, or approved by State agencies under the SHPA. However, private owners of properties eligible for, or even listed on, the Registers using private funds can alter or demolish their properties without such a review process. Privately owned properties that are New York City Landmarks, in New York City Historic Districts, or pending designation as Landmarks are protected under the New York City Landmarks Law, which requires LPC review and approval before any alteration or demolition can occur, regardless of whether the project is publicly or privately funded. Publicly owned resources are also subject to review by the LPC before the start of a project; however, the LPC's role in projects sponsored by other City or State agencies generally is advisory only.

FARLEY COMPLEX

In the Future Without the Proposed Action, USPS would continue to operate the main post office retail facility in the Farley Building and would reoccupy much of the space anticipated for the proposed Moynihan Station with administrative and mail sorting functions. Major distribution activities, which have relocated to the Morgan Annex on Ninth Avenue, would not be reintroduced to the Farley Complex. In addition, USPS would redevelop the Western Annex to contain approximately 685,000 of commercial space, comprising approximately 248,000 square feet of retail space and 436,000 square feet of office space. By 2010, the restoration of the Farley Building's Eighth Avenue façade will have been completed, and the appearance of the building will have been improved.

It is anticipated that the commercial redevelopment of the Western Annex would involve exterior changes to provide new commercial entrances and fenestration and interior reconfigurations, mechanical upgrades, and other changes to accommodate the new uses. Since leasing space in the Western Annex for commercial redevelopment would be an undertaking, as defined in 36 CFR Part 800 ("Protection of Historic Properties"), by USPS, the agency would be required under Section 106 to take into account effects on the Farley Complex from the redevelopment. Any physical changes to the Farley Complex, in addition to the change in use, would be assessed for adverse impacts by USPS in consultation with OPRHP, acting in its capacity as the SHPO. As required by the Section 106 process, USPS would seek and consider the views of the public and afford the Advisory Council a reasonable opportunity to comment on the undertaking. It is anticipated that changes to the Farley Complex would conform to the Secretary of the Interior's Standards (the SI Standards) for the Treatment of Historic Properties.

DEVELOPMENT TRANSFER SITE

No changes to the Development Transfer Site are expected by 2010 in the Future Without the Proposed Action.

STUDY AREA

In the historic resources study area, there is one project currently under construction and one projected for completion by the project build year. The Fashion Institute of Technology is currently converting the S/NR-eligible loft building at 406-426 West 31st Street into a dormitory. The exterior is being restored, the interior is being gut-renovated, and a one-story freight handling addition will be constructed at the south façade. This project will maintain and restore the building's exterior while changing its use.

An approximately two million-square-foot, mixed-use office and residential building is projected as part of the Hudson Yards redevelopment over the open cut of the Penn Station Rail Yard at Ninth Avenue and West 31st Street (Projected Development Site 33). The mixed-use building would be located across the wide Ninth Avenue from the Farley Complex, too far to cause construction-related effects, but by constructing a large building on a site currently characterized by openness and rail uses, the project would change the setting of the Farley Complex and the loft building at 406-426 West 31st Street. The projected building would increase the density of development on Ninth Avenue, and it would be prominently visible in views north and south on the avenue and views east and west on West 31st Street. However, the new building would not block significant views of the Farley Complex or visually overwhelm the monumental resource. In westward views on West 31st Street from Eighth Avenue, the projected building would appear in the background of the Farley Complex, and in westward views on West 33rd Street from Eighth Avenue, the building would most likely not be visible, or only slightly visible, over the architectural resource.

E. FUTURE WITH THE PROPOSED ACTION: 2010

INTRODUCTION

For analysis purposes, there are two development scenarios for the proposed project. In both scenarios, the Farley Complex would be redeveloped with the new train station and commercial uses, which is Phase I of the project. Phase II is the utilization of the Farley Complex's unused development rights and there are two are options for the Phase II development. Under Scenario 1, the development rights, as proposed by Developers A and B, would be used to construct an approximately 1 million-zoning-square-foot commercial overbuild atop the Western Annex, but this option would be built by 2015 or at some point thereafter—it is, therefore, discussed below in the Future With the Proposed Action: 2015. Under Scenario 2, Developer C would use the unused development rights to construct a 1.1 million-gross-square-foot building (primarily residential or mixed-use) on the Development Transfer Site—construction of this development would occur concurrently with Phase I and be completed by 2010. See Chapter 1, "Project Description" for illustrations of the proposed project.

As described in Chapter 1, "Project Description," ESDC/MSDC conditionally designated Developer C as the preferred developer of the proposed project. Since that designation is conditional and most of the Phase I elements are common to each developer team proposal, this analysis looks at potential Phase I impacts to historic resources from all three developer team proposals. Where Developer C proposes unique project elements, they are discussed separately.

SCENARIO 1

FARLEY COMPLEX

As described in Chapter 1, "Project Description," Phase I of the proposed project would include constructing a new train station, to be named the Daniel J. Patrick Moynihan Station (Moynihan Station), in the Farley Building, privately developing the Western Annex with commercial space, and extensively restoring the Farley Complex's exterior and certain interior spaces. USPS would continue to maintain space in the Farley Complex for postal retail operations, administration, and mail distribution, and the main retail lobby, rotundas and side lobbies, and public stairways would be restored. As proposed by the three developer teams, the design of Moynihan Station would be similar to the design of the station as proposed and analyzed in the 1999 EA. As part of the environmental review in 1999, FRA concluded pursuant to the Section 106 process that there would be No Adverse Effect on the Farley Complex from the redevelopment project. However, since the proposed project includes modifications to the design of the train station and includes new elements not analyzed in 1999, the analysis below assesses new or different impacts to the Farley Complex from Phase I of the proposed project.

Moynihan Station and USPS Facilities

In general, the three developer proposals provide a station design that consists of an expanded and widened West End Concourse, a train concourse level, and an intermodal hall at ground level. This layout is similar to the station design that was approved in 1999, except that it no longer includes an intermediate concourse level between the train concourse and the West End Concourse. All three proposals provide an intermodal hall enclosed with a glass skylight, a train concourse in the location of the Farley Building atrium under either a renovated work room skylight or a new skylight, at-grade Eighth Avenue station entrances through the corner pavilions, continued USPS use, mechanical upgrades, full or partial removal of the moats, and a comprehensive restoration program of the Farley Complex exterior (that includes restoration and replacement of the terra cotta cresting) and the postal rotundas and side lobbies. In addition, all three proposals include removing the existing cobra-head lighting system and installing a modern exterior lighting system that is more compatible with the building's historic character. The specific elements of the Phase I redevelopment program and their potential effects are described below.

Intermodal Hall. All three developer teams propose constructing a through-block intermodal hall between the Farley Complex and the Western Annex in the location of the midblock connecting sections on West 31st and 33rd Streets. Each proposal envisions covering the intermodal hall with a glass and steel skylight that, together with the train concourse described below, is meant to reference the layout, design, and feeling of the original Pennsylvania Station. The three proposed designs have similarities, but there are also distinct differences. In each proposal, the primary station entrances, which would be ADA compliant, are through the intermodal hall on West 31st and 33rd Streets. These entrances are at the location of the existing connecting sections and, in each proposal, the midblock corner pavilions of the Farley Building and Western Annex would be preserved. Areas for taxi pick-ups and drop-offs would be located at one or both of the entrances. Adjacent to the southern entrance, a portion of the moat would be filled in, and the remaining moat sections along the Farley Complex would be either filled in or reduced in width and turned into lightwells to create wide, landscaped sidewalk entrance plazas. Alternatively, as currently contemplated in the Developer C proposal, the north moat adjacent to the Farley Building would be partially altered with the insertion of a glass roof structure (this

structure is described more fully below). Inside, the intermodal hall would lead down to the train concourse that would be located at a lower level. The remaining portion of the original west façade of the Farley Building (found within an enclosed service court off West 33rd Street) would be preserved. Where sections of the original west façade were removed for construction of the annex in 1934, new construction would be modern but would be expected to reference the original design in terms of scale and detailing. In the Developer A and B proposals, bridges would be constructed across the intermodal hall to provide circulation between the Western Annex and Farley Building.

In each developer team proposal, a glass and steel skylight would crown the intermodal hall. Developer A and Developer B propose an arched, glass structure approximately 150 to 180 feet tall. The Developer B proposal retains the 186-foot-tall glass structure composed of an elliptical, double-layer steel lattice shell, which was analyzed in the 1999 EA. The Developer A proposal modifies that original arch by lowering it approximately 30 feet and redesigning the structural system while retaining the arched form. In each of those proposals, the masonry façades of the original connecting sections between the Farley Building and Western Annex would be removed. In comparison, Developer C proposes retaining and restoring the midblock sections of the masonry façades.

In the Developer C proposal, the new building entrances would be through the existing three arched window openings on West 31st Street and the two arched truck entrances on West 33rd Street. This entrance design would preserve the midblock façade sections and retain existing building depth behind the walls. The tall interior space of the intermodal hall would be set back within the building plan, in line with the footprint of the train concourse. Each entrance would have modern canopies, and an exterior stair would be constructed at the West 31st Street entrance. As currently contemplated, the metal window framing and grills within the arches would be removed. The entrance canopies would largely be freestanding with minimal ties to the Farley Complex. As proposed by Developer C, the new intermodal hall skylight would be shorter than the arched form proposed by the other two developers, and it would be designed in the form of a barrel vault with light structural members. The skylight would be 145 feet to the highest point of the vault. Further, since the intermodal hall has a shorter footprint within the building, the skylight would be set back from the street façades. This position would reduce its visibility in comparison to the skylights proposed by the other two developers that would rise from a point in front of the façades.

Overall, it is expected that the intermodal hall would not have significant adverse impacts on the Farley Complex. In each developer proposal, the intermodal hall would be designed to minimize the removal of masonry and reduce the visibility of the skylight. Since the Developer C proposal would not remove any historic masonry and would construct a shorter skylight set back from the north and south façades that would be less visible than those proposed by Developers A and B, the Developer C proposal would have a more beneficial effect on the Farley Complex by preserving more of its architectural integrity. The final design of the intermodal hall would be developed in consultation with OPRHP to ensure that it is compatible with the historic character of the Farley Complex.

Train Concourse and Waiting Area. A new large train concourse and waiting area would be constructed in the Farley Building interior atrium at the existing basement level. To construct the concourse, the non-original mezzanine, the original floor of the work room, and a portion of the basement floor would be removed so that the space would have greater height. Above, there would be a skylight that is either a completely new structure or a modification of the existing

skylight. Developer C proposes constructing a new skylight similar in design to the intermodal hall skylight. It would be a low vault with a light steel structure that would have minimal visibility from the street. The skylight would rise above the roof of the Farley Building, but it would tie into the atrium façades at the approximate locations of the existing skylight connections. The existing skylight is set much lower within the atrium at a position between the second and third floors. Removing and replacing the skylight would create a grand interior space.

In each developer team proposal, design features would establish a visual connection from the train concourse to the West End Concourse and the track level for passengers and would provide natural light to the platforms. Stairs and escalators would lead down from the intermodal hall to the train concourse, and the space between the two station areas would be designed to provide a visual connection. Restaurants, retail space, train passenger services, circulation corridors, and open seating are planned for the perimeter of the train concourse and waiting area.

It is expected that the train concourse would not have any significant adverse impacts on the Farley Building. Although an original element of the Farley Building would be removed under the Developer C proposal, the work room skylight is not currently visible to the public, it has been altered over time, and the new skylight would create a more open and light-filled train concourse. Under each proposal, all new construction—new or modified skylight, ticketing windows, storefronts, and interior finishes—would be designed in consultation with ESDC/MSDC and OPRHP to be compatible with the building's historic character. Further, the proposed project would create a publicly accessible space within the Farley Building atrium, an area of the building that is not currently open to the public.

Eighth Avenue Station Entrances. To provide access to the station from Eighth Avenue, new at-grade entrances would be constructed at the corner pavilions. They would be installed on each side of the monumental stairs at the corner moats in order to separate station users from USPS pedestrian traffic, which would continue to enter at the colonnade level. The stone walls bordering the moat would be removed to allow for regrading and access to the entrances. Some form of architectural treatment, such as a special paving, could be explored to mark the location of the removed walls. Existing doorways on the corner pavilions' Eighth Avenue façades would be slightly widened to create sidewalk level station entrances below the existing domed niches. The new entrances would be planned to be clearly identifiable as leading to the station, while minimized as much as possible. Under the Developer C proposal, these new entrances would only be slightly wider than the existing entrances and they would be marked by metal and glass canopies. The canopies would have minimal connections to the building. Since the new entrances would be designed in consultation with OPRHP, it is anticipated that there would be no significant adverse impacts from them.

USPS Truck Access. Creation of the intermodal hall would replace the existing truck entrances on West 33rd Street, and truck access through the Ninth Avenue arches would be discontinued. In addition, it would not be desirable to maintain the existing row of loading bays on West 31st Street adjacent to the new station entrance through the intermodal hall. Therefore, to provide truck access into the Western Annex, the three developer teams plan to replace most or all of the West 31st Street loading docks and the West 33rd Street moat adjacent to the Western Annex with one or two new truck ramps with curb cuts on Ninth Avenue. Developer C would retain some of the exterior loading docks and provide a truck ramp on West 31st Street to a new below-grade loading area. Developers A and B propose removing all of the exterior loading

docks. Developer A would create truck ramps from Ninth Avenue on both West 31st and 33rd Streets, while Developer B would provide one ramp on West 31st Street.

It is anticipated that the removal of some or all of the loading docks and the flanking masonry walls and construction of new ramps would not have a significant adverse impact on the Farley Complex, because the new entrances would be inserted into the building's basement level where there is minimal architectural detailing. Further, it is currently envisioned that the new openings would be made with granite salvaged from other areas of the building, if possible, and designed in consultation with OPRHP.

Continued USPS Use. A key component of the project is the continued USPS use of the retail lobby, some upper floor administrative offices in the Farley Building and Western Annex, loading areas in the Western Annex, and access to the rail lines below for mail freight operations. New passages would be created between the historic postal retail lobby and the new station through the side lobbies at the north and south ends of the retail lobby. The transitional areas between the side lobbies and the station would be designed in consultation with OPRHP and compatibly designed with the historic interior spaces of the Farley Building. In addition, the side lobbies, the flanking rotundas including the Lozowick murals, and the public stairs would be restored. The USPS would restore the retail lobby at some point in the future, in accordance with an agreement with the designated developer. Restoration of the retail lobby would be subject to Section 106 review prior to its undertaking. Overall, it is anticipated that there would not be any significant adverse impacts from creation of the transitional areas between the historic USPS public spaces and the station.

Mechanical Upgrades. The proposed project would remove and replace the remaining old mechanical systems in the Farley Building. Since the 1999 EA determined that some of the original mechanical equipment could be found to be historic, historical documentation would be conducted, if requested by OPRHP, for the removal of significant historical equipment.

Eighth Avenue Subway Improvements. The below-grade subway connector at West 33rd Street would be reconfigured to improve pedestrian circulation and access between Penn Station, the Farley Building, and the Eighth Avenue subway. This part of the project would not affect any historic components of the Farley Building.

Overall, it is expected that development of the proposed Moynihan Station would not have significant adverse impacts on the Farley Complex. Design elements common to the three developer proposals that would minimize the potential for significant adverse impacts include efforts made to minimize the removal of masonry, design of the intermodal hall skylight to reduce its visibility, the clear differentiation between new and historic building components, and treatment of significant interior spaces in a manner sensitive to the original architectural design. However, the Developer C proposal would have more beneficial effects on the Farley Complex than would the Developer A and B proposals, because it would retain and restore the midblock connecting sections for the intermodal hall entrances and would set the intermodal hall skylight back from the north and south façades. More original material would be preserved by the Developer C proposal, and the new intermodal hall and train concourse skylights would have minimal visibility from the surrounding streets. Additional project elements common to all three developer proposals that would have beneficial effects on the Farley Complex include continued USPS use of portions of the building, an extensive restoration program (described below), and adaptive reuse of the historic building for a station designed to reference the former Pennsylvania Station with a light-filled and spacious intermodal hall and train concourse.

Commercial Redevelopment

Under the proposed project, the Western Annex would be redeveloped with commercial uses, with some space retained for USPS use, and a boutique hotel would be included as part of the redevelopment of the Farley Building, as described in Chapter 1, "Project Description." The new commercial uses, as proposed by the three developer teams, would be consistent with the overall adaptive reuse project, in which Moynihan Station is a key component and the USPS would have a continued presence in the building. Therefore, the expanded commercial uses and a new hotel use would not have significant adverse impacts on the Farley Complex.

Several physical alterations to the Western Annex are common to the three developer team proposals. To accommodate the needs of the retail tenants, it is anticipated that new entrances would be inserted into the Ninth Avenue corner pavilions through the existing arched windows and that the existing West 33rd Street pedestrian entrance lobby (including the deteriorated mural) would be removed or reconfigured for the new interior spaces. Removal of the mural would be an adverse impact, and, therefore, the Draft MOA between USPS, ESDC, SHPO, and the Advisory Council stipulates that the mural will be graphically and photographically documented, as more fully described in Chapter 19, "Mitigation." In some cases, the new Ninth Avenue corner entrances would provide public access into the Western Annex retail spaces, and in others they would provide access to smaller dedicated spaces. Within the Western Annex, each proposal would create a pedestrian passage linking Ninth Avenue to the intermodal hall. Each proposal varies somewhat on the design, height, and specific uses of the passage, but each envisions it as a public gathering space with flanking retail and cultural uses. Entrance to the new public space would be through the Ninth Avenue arches, which would be modified from truck entrances into an inviting pedestrian portal. As currently contemplated in the Developer C proposal, the metal grills within the arched openings would be removed to create modern, open portals.

Carving a pedestrian passage/courtyard through the Western Annex would not have a significant adverse impact on the Farley Complex, because the interior spaces are undistinguished, utilitarian back-of-the-house facilities and typical office spaces, and the passageway would enhance the Moynihan Station design by creating visual links between the intermodal hall and Ninth Avenue. In addition, it is anticipated that the new entrances through the Ninth Avenue arches and Ninth Avenue corner pavilions would be compatibly designed with the building's historic character. Construction of the passageway would follow a construction protection plan developed and implemented in consultation with OPRHP to avoid adverse physical impacts to adjacent portions of the Farley Complex. Further, the passageway and entrances would be designed in consultation with OPRHP to ensure compatibility with the architectural character of the building. Therefore, it is expected that redevelopment of the Western Annex would not have an adverse impact on the historic character of the Farley Complex.

However, there are unique program elements specific to certain of the developer proposals that potentially could result in adverse impacts to the Farley Complex. These program elements are:

- Construction of a new central mechanical plant and cooling tower on the roof of the Farley Complex in the Developer A and C proposals. Depending on the location, size, design, and visibility of the plant, this element could have adverse visual impacts on the Farley Complex. As described more fully in Chapter 9, "Urban Design and Visual Resources," the plant constructed under the Developer C proposal would be designed to limit its visibility from the immediate vicinity.

- Construction of a rooftop banquet hall on the southern side of the Western Annex in the Developer B proposal. As currently envisioned, the banquet hall would be set back from the roofline and of a modern glass and metal design. Construction of the banquet hall (along with construction preparations for the Phase II overbuild described below) would entail removal of the stone pyramids capping the Ninth Avenue corner pavilions. These pyramids complement those on the Eighth Avenue corner pavilions, and removal of these historic masonry components would alter the original appearance of the Farley Complex, resulting in an adverse impact to the building. In addition, the banquet hall could have adverse impacts on the Farley Complex, depending on the addition's final design, relationship with the building's historic architectural character, and visibility from the surrounding streets.
- Construction of an arcade behind the Ninth Avenue façade in the Developer A proposal. This arcade would be behind the Ninth Avenue arches and windows to provide views to the large retail spaces within the Western Annex. It would also serve as a pedestrian corridor from entrances at the Ninth Avenue corner pavilions to the Ninth Avenue lobby and pedestrian passageway through the annex. Depending on final design, this arcade could have adverse impacts on the Farley Complex.
- New windows inserted into the existing window openings along Ninth Avenue and West 31st and 33rd Streets in the Developer A and B proposals to create a street level retail presence. Following full removal of the West 31st Street loading docks in the Developer A and B proposals, the fenestration above would be enlarged by pulling the openings down to ground level. Depending on final design, the new windows and enlarged openings could have adverse impacts on the Farley Complex. (As described below, Developer C would apply for Federal Historic Preservation Tax Incentives, and, therefore, the Western Annex windows would be restored to the highest preservation standards in consultation with OPRHP and there would be no adverse impacts to the Farley Complex.)
- Potential insertion of a glass enclosure in the West 33rd Street moat adjacent to the Farley Building in the Developer C proposal. Although designs are only preliminary, it is currently envisioned that the north moat would be used for restaurant seating at the concourse level. To create this space, the existing floor level of the moat would be lowered and a glass enclosure would be constructed within the moat. Supported on columns, the glass enclosure would not attach to the Farley Building and it would rise to approximately the base of the West 33rd Street colonnade. Lowering the moat level would reveal more of the building's base. The new glass enclosure would alter the Farley Building's relationship to the street, but since this new feature would be designed in consultation with OPRHP, it is not expected that there would be adverse impacts to the historic resource.

Restoration Program

A comprehensive and detailed restoration program for the Farley Complex is a primary objective of the proposed project. All three developer team proposals include a restoration program, but it is assumed that the Developer C program would be more extensive, because Developer C would apply for Federal Historic Preservation Tax Incentives. Further, the Developer C proposal approaches the project as a preservation project. The tax incentives would require that the proposed restoration be reviewed by OPRHP and the National Park Service (NPS) to ensure that the building's exterior would be restored to the highest preservation standards. To qualify for the tax incentives, the exterior restoration would follow the SI Standards. In addition, the restoration and renovation program proposed by Developer C is more extensive and respectful of the Farley

Complex's architectural integrity, because it retains and restores the midblock connecting sections.

It is expected that the Developer A and Developer B restoration programs would attempt to follow the SI Standards and be developed in consultation with OPRHP, but, as mentioned above, both Developers A and B would remove sections of historic exterior masonry between the Farley Building and Western Annex. In general, the restoration program, as proposed by the three developers, is anticipated to include: cleaning and repointing the granite façades; restoring the terra cotta cresting and replacing it where missing or heavily damaged; replacing the existing copper roof in kind; restoring the existing wood window sashes on the Farley Building or replacing them as needed; replacing the fifth floor aluminum windows with new aluminum sash; replacing louvers with new windows designed to match original windows; installation of new granite where missing or damaged, or where required at new openings, using salvaged granite from other parts of the building when possible; replacement of the existing cobra-head light fixtures with more appropriate lighting; restoring the postal retail lobby and flanking rotundas to their original appearance; and restoring the side lobbies for adaptive reuse as pedestrian links between the USPS lobby and the station. As described above, the USPS will be responsible for restoration of the retail lobby and will commit to the restoration in an agreement with the designated developer. The Eighth Avenue façade is currently being restored under the auspices of MSDC.

Conclusions

In general, it is expected that Phase I of the proposed project would not have significant adverse impacts on the Farley Complex. The architectural design of the new station spaces, commercial facilities, and the pedestrian corridor would be modern, but the final design of Phase I would be developed in consultation between the preferred developer, ESDC/MSDC, and OPRHP to ensure compatibility with the historic character of the structure. In addition, construction protection measures would be developed and implemented in consultation with OPRHP to avoid adverse impacts on the Farley Complex exterior and the interior spaces to be preserved as part of the proposed project. Further, the adaptive reuse project and the restoration program would have overall beneficial effects on the Farley Complex.

However, where any potential adverse impacts on the Farley Complex are identified, mitigation will be developed by the preferred developer and ESDC/MSDC and included in the LOR to be executed with OPRHP. Such mitigation could include specifications for the treatment of affected historic features and the general requirement that ongoing consultation occur as the design develops. It is expected that one stipulation of the LOR will be the implementation of a construction protection plan for Phase I. The LOR will be executed prior to completion of the FEIS for the proposed project, and it will be summarized in the FEIS.

As described above, ESDC/MSDC conditionally designated Developer C as the preferred developer in July 2005. Since that conditional designation, there has been ongoing consultation between ESDC/MSDC, Developer C, OPRHP, and the NPS. This consultation seeks to reach agreement on a Phase I design that will qualify for the Federal Historic Preservation Tax Incentives and will, therefore, have no significant adverse impacts on the Farley Complex (See Appendix C for OPRHP correspondence).

STUDY AREA

The Glad Tidings Tabernacle, the former J.C. Penney Company building, and the former William F. Sloan Memorial YMCA are located close enough to the Farley Complex (within 90 feet) to potentially experience adverse construction-related impacts. Therefore, to avoid inadvertent construction damage from ground-borne vibrations, falling debris, collapse, or subsidence, a construction protection plan would be developed and implemented in consultation with OPRHP. It is expected that the plan would be stipulated in the LOR to be executed among ESDC/MSDC, the preferred developer, and OPRHP and that it would follow the guidelines of *TPPN #10/88*, which "requires a monitoring program to reduce the likelihood of construction damage to adjacent historic structures and to detect at an early stage the beginnings of damage so that construction procedures can be changed." Phase I of the proposed project would not have adverse physical impacts on any of the other architectural resources in the study area, as they are all located more than 90 feet from the project site, outside the range of potential construction damage.

No adverse visual or contextual impacts on surrounding architectural resources are expected as a result of the proposed project. The new Moynihan Station and the commercial uses in the Farley Complex would be in keeping with the largely transportation and commercial character of the study area. While new glass skylights covering the intermodal hall and train concourse would be new features on the project site, they would not eliminate or screen publicly accessible views of a resource, isolate an architectural resource from or alter its visual relationship with the streetscape, or introduce an incompatible visual element to a resource's setting. Therefore, the intermodal hall and train concourse skylights would not have an adverse visual or contextual impact on surrounding resources, which occupy an area characterized by a variety of structures of various sizes, materials, uses, and design.

SCENARIO 2

Under Scenario 2, the Farley Complex would be redeveloped in Phase I of the project with a new station and commercial spaces, as described above. Scenario 2 would also involve the development of a 1.1 million-gross-square-foot building on the Development Transfer Site. Constructed by Developer C using the Farley Complex's unused development rights, the building would be either a primarily residential structure or a mixed-use one. The transfer of development rights across Eighth Avenue is proposed to preserve the Farley Complex's architectural integrity. Developer C would not construct an overbuild in order to pursue the Federal Historic Preservation Tax Incentives described above.

As currently envisioned by Developer C, the Development Transfer Site building would be massed above a four-story base with three components of various heights. A portion of the proposed building could rise from the street without setbacks to a height of up to 720 feet, which is approximately 75 feet shorter than One Penn Plaza adjacent to the east. The tallest portion would be located on West 34th Street. On West 33rd Street the illustrative building would be approximately 460 feet tall. The shortest section would also front on West 33rd Street, where the building would rise to a height of approximately 140 feet. The new development is expected to have a modern design.

DEVELOPMENT TRANSFER SITE

There are no architectural resources located on the Development Transfer Site. Therefore, there would be no significant adverse impacts to architectural resources.

STUDY AREA

It is expected that the new building on the Development Transfer Site would not have adverse physical impacts on architectural resources. There are no architectural resources located within 90 feet of the site, close enough to experience inadvertent construction damage from ground-borne construction-period vibrations, subsidence, collapse, or other accidental damage.

The new building is also not expected to have adverse visual or contextual impacts on architectural resources. It would be in keeping with the mixed-use character of the study area and would be similar in height, massing, and design to One Penn Plaza and the development projected for construction on Ninth Avenue on the Hudson Yards Projected Development Site 33. The proposed building would not eliminate or screen significant publicly accessible views of a resource, isolate an architectural resource from or alter its visual relationship with the streetscape, introduce an incompatible visual element to a resource's setting, or introduce significant new shadows on a historic structure with sunlight-dependent features. (See Chapter 7, "Shadows," for a discussion of shadow effects on historic resources.) Although the new building would eliminate some existing views of the Farley Complex from the public plaza on the Development Transfer Site, the Farley Complex would continue to be prominent in views on Eighth Avenue.

F. FUTURE WITHOUT THE PROPOSED ACTION: 2015

PROJECT SITE

In the Future Without the Proposed Action, the Farley Complex would continue to house USPS operations in the Farley Building and portions of the Western Annex, and retail and office uses in the Western Annex. No changes to the Farley Complex are anticipated. Further, there would be no changes to the Development Transfer Site, which would continue to be occupied by the three one-story retail buildings and the public plaza.

STUDY AREA

As part of the Hudson Yards redevelopment, there are four developments projected for completion in the historic resources study area. An approximately 1.3 million-square-foot, mixed-use office and residential building would be constructed at the southwest corner of Ninth Avenue and West 33rd Street on Projected Development Site 32, adjacent to the north of the mixed-use building that would be constructed on Projected Development Site 33 by 2010. Removing the S/NR-eligible loft building at 424 West 33rd Street, the mixed-use building on Projected Development Site 32 would sit immediately across West 33rd Street from the St. Michael's Roman Catholic Church Complex and Cheyenne Diner, and across Ninth Avenue from the Farley Complex. Located across a narrow street from the church and diner, the project could cause accidental construction damage to those resources from ground-borne construction-period vibration, subsidence, collapse or other inadvertent construction damage. Increasing the density along Ninth Avenue and replacing a parking lot and mid-rise loft building with a large structure, this project would change the setting of the church, diner, and Farley Complex, as well as that of the William F. Sloan Memorial YMCA. In westward views on West 33rd Street from Eighth Avenue, the projected mixed-use building would be visible in the background of the Farley Complex. As seen from Ninth Avenue, the Farley Complex's monumentality would be maintained, although the west side of Ninth Avenue between West 31st and West 33rd Streets would be developed with large mixed-use buildings.

On Projected Development Site 30, a residential building with ground-floor retail is projected for construction adjacent to the north of the Cheyenne Diner where it could inadvertently damage the small architectural resource from construction-related activities. Similarly, a residential building on Projected Development Site 43 at the northeast corner of Ninth Avenue and West 34th Street could accidentally damage the adjacent West Side Jewish Center. The setting of each resource would be altered by the adjacent projected developments. The building on Projected Development Site 30 would replace several low-rise commercial buildings, and the structure on Projected Development Site 43 would replace a parking lot and a few low-rise commercial buildings.

The fourth project located in the study area would be a residential building constructed on a parking lot at the southwest corner of West 31st Street and Eighth Avenue, across from the Farley Complex's southeast corner pavilion. Built on Projected Development Site 44, this building would add to the density of development along Eighth Avenue, but it would not block views of the Farley Complex's Eighth Avenue colonnade or significantly alter the resource's setting.

G. FUTURE WITH THE PROPOSED ACTION: 2015

SCENARIO 1

Under Scenario 1, the Farley Complex's unused development rights would be used to construct an approximately 1 million-zoning-square-foot commercial overbuild atop the Western Annex by 2015. There would be no changes to the Development Transfer Site, which would continue to be occupied by the three one-story retail buildings and the public plaza.

FARLEY COMPLEX

As proposed by Developers A and B, the commercial overbuild would rise above the West 33rd Street façade of the Western Annex. As currently envisioned, the overbuild would be a tall structure massed without setbacks that would rise flush from the Western Annex north façade. The new building would have a high-tech modern design with large amounts of glazing and clearly articulated structural systems revealed through exposed framing. The entrance to the office tower would be from West 33rd Street at the approximate location of the existing pedestrian entrance to the Western Annex.

While the additional commercial use would be consistent with the overall adaptive reuse of the Farley Complex, a building constructed above it would have an adverse impact on the historic resource. The office overbuild would compromise the historic resource's architectural integrity by transforming it from a free-standing, monumental masonry building into a low-rise base for a modern office structure. The Farley Complex's visual prominence would also be altered. In addition, both Developers A and B would cover the north façade of the Western Annex at the entrance with a modern, primarily glass skin to create a distinct identity for the structure at the base. This design could break the historic rhythm of the colonnade that encircles the Farley Complex and remove some of the historic masonry. Therefore, the final design of the overbuild, if constructed, would be developed in consultation with OPRHP, and any mitigation measures would be stipulated in the LOR that will be executed among the preferred developer, ESDC/MSDC, and OPRHP. Since construction of the overbuild could also have adverse physical impacts on the Farley Complex, the implementation of a construction protection plan will be stipulated in the LOR.

STUDY AREA

Construction of a commercial overbuild above the Western Annex could cause adverse, inadvertent physical impacts to architectural resources located within 90 feet of construction activities. Therefore, to avoid inadvertent construction damage to the architectural resources located across West 33rd Street—Glad Tidings Tabernacle, the former J.C. Penney Company building, and the former William F. Sloan Memorial YMCA—from ground-borne construction-period vibrations, falling debris, collapse, or subsidence, a construction protection plan would be developed and implemented in consultation with OPRHP. It is expected that the plan would be stipulated in the LOR to be executed among the preferred developer, ESDC/MSDC, and OPRHP and that it would follow *TPPN #10/88* guidelines regarding procedures for the avoidance of damage to historic structures resulting from adjacent construction. No other architectural resources are located close enough to the project site to potentially experience inadvertent construction damage from the proposed overbuild.

It is not expected that the overbuild development would have adverse contextual or visual impacts on any of the architectural resources located in the study area. The office use would be in keeping with the mixed-use character of the study area, in which several large mixed-use buildings would be constructed by 2015. Located above the existing Farley Complex, the proposed overbuild would not eliminate or screen publicly accessible views of a resource, isolate an architectural resource from or alter its visual relationship with the streetscape, or introduce an incompatible visual element to a resource's setting. As described in Chapter 7, "Shadows," it would also not have adverse shadow impacts on surrounding architectural resources with sunlight-dependent features. Further, the overbuild would be similar in height, massing, and design to the developments projected for construction across Ninth Avenue on the Hudson Yards Projected Development Sites 32 and 33. The overbuild would become one of many recently constructed, tall modern buildings in the study area. ✷