

<p>Separating Amtrak's high speed rail passengers from other Penn Station users raises serious questions about social and racial justice. A tabulation of the racial composition of Amtrak's passengers, by access mode, is not included in the EA.</p>	<p>Section 3.7.7 of the EA addresses environmental justice considerations and Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The proposed Project would have no significant environmental justice impacts. It would improve not only the transportation infrastructure of the region but also the socioeconomic aspects of the surrounding West Side neighborhood and the region as a whole. Not only high speed rail passengers but all Amtrak passengers will be able to use the new Farley Building facilities. A tabulation of the racial composition of Amtrak's passengers by access mode was not included in the EA because it is not considered relevant to the evaluation of the environmental impacts of the project.</p>
<p>A major investment study of a comprehensive development plan for the entire Penn Station complex and its environs, including provision for improved access to subways and more efficient operation of trains through Penn Station and its environs should be completed before this \$450 million project is permitted to advance.</p>	<p>A Major Investment Study is not required for the Pennsylvania Station Redevelopment Project. The proposed Project addresses the need to improve intercity and commuter rail facilities at Penn Station and includes improved access to the existing subway system through the reconfiguration of the Eighth Avenue Subway connector at West 33rd Street that serves as the underground link between Penn Station and the Farley Building (see section 1.3.1.2). Plans and studies to address the needs of transportation users at Penn Station have been underway since the early 1990s.</p>
<p>Mr. Haikalis' comments included a copy of comments submitted by the Committee for Better Transit, Inc. on the FRA's 1995 environmental assessment.</p>	<p>A response to these comments and other comments received on the 1995 EA was prepared by FRA in early 1996 and these comments and responses were considered by the agency in preparing the 1999 EA.</p>

Katherine Gray, Manhattan Community Development

<p>Board disappointed that it received no formal presentation of the Pennsylvania Station Redevelopment Corporation (PSRC) proposal and did not have an opportunity to participate in the section 106 process.</p>	<p>PSRC will make a formal presentation to the Board on October 18, 1999. The Board was not a participant in the section 106 process for the original Amtrak proposal and FRA was unaware of the Board's interest in participating with respect to the PSRC design. There was no intention by the FRA to exclude any interested parties. The EA in Volumes I and II contains a lengthy discussion of the section 106 process and historic preservation considerations relative to the current design.</p>
<p>There is a lack of clarity with respect to provisions for access by the disabled, although frequent references are made to such provisions and the Board realizes that in practice the project will have to comply at a minimum with the Americans With Disabilities Act (ADA).</p>	<p>Ensuring compliance with the ADA is one of PSRC's principal goals for the project, particularly in light of the inadequacy of the current facilities. PSRC has met with several groups representing individuals with disabilities. Ensuring full access to the facilities will be a key component of the Project as design progresses.</p>
<p>There will be significant impacts on 33rd and 31st Streets in particular due to the increase in taxi and limousine traffic and the dilution of the impacts due to the new taxi dropoffs between Eighth and Ninth Avenues will not be adequate mitigation. The Board favors direct access for traffic coming from Ninth Avenue and farther west and regrets that it seemed necessary to abandon earlier proposals that might have enabled such access.</p>	<p>Overall, most of the increased traffic in the station area is related to the development of other projects in the study area. The Build Alternative would not create any exceedances of accepted thresholds to the area's traffic but will contribute to some increased traffic on 31st and 33rd Streets. PSRC considered proposals to switch the traffic flow on 31st or 33rd streets, however, the New York City Transportation Department was not receptive to this proposal and it cannot be accomplished without the agency's concurrence.</p>

<p>Serious consideration should be given to opening, widening, or extending more underground connections between the Farley Building and the Eight Avenue Subway and also to offering some supplementary Amtrak facilities as ticketing at places that would make access easier for the considerable number of train passengers who now do or in the future will use the subway.</p>	<p>The proposed action includes the reconfiguration of the Eighth Avenue Subway connector at West 33rd Street that serves as the underground link between Penn Station and the Farley Building. The east-west ramps along the passageway would be lengthened to meet ADA requirements and the corridor would be widened by removing a stair on the eastern ramp and by relocating a stair on the western ramp to avoid pedestrian congestion, clear lines of travel, enhance passenger orientation, and improve the degree of ADA access for rail station users. Additional widening of this corridor is not possible because of physical constraints. In order to provide for passenger growth in the future, the Plan includes provisions for the possibility of an extension of the existing Hilton Corridor, which currently dead-ends in the existing facility, to connect with the West End Concourse underneath the Farley Building.</p>
<p>The restoration and adaptation of the building is excellent, and in significant ways better than the earlier proposal. The adaption of the historic glass roof of the space that will become the new concourse, the opening up of spaces that will make the trains visible from the concourse, and most other adaptative changes are highly appropriate.</p>	<p>Comment noted.</p>

<p>The Board is concerned with the exterior treatment of the "intermodal hall" at the middle of the building. Removal of the intermediate bays of the walls on the side streets involves the loss of significant historic fabric showing the relationship between the two portions of the building along with the two great arches on West 33rd Street that are among the best and most original features of this later part. The glass roof is not historic in style, is expensive and unfunctional and unnecessarily separates the building into transportation and postal service halves.</p>	<p>FRA carefully considered the impact from the removal of the exterior wall at the middle of the building. The agency concluded that this was not a significant impact because the penetration was limited to 4% of the facade of the building and in light of the Project's comprehensive preservation program, the detailed efforts that were expended by PSRC and its architects to develop alternative designs, and the considerable efforts that were expended by PSRC to minimize the removal of stone. PSRC and its architects also conducted an extensive alternatives analysis with respect to the height of the intermodal hall. In response to concerns expressed by the State Historic Preservation Officer, the height was reduced by approximately 10% to reduce its visibility from the street. The height of the hall serves an important orienting function for rail passengers and recreates the sense of scale that was found in the original Pennsylvania Station. The agency does not believe that the glass roof separates the building into transportation and postal service halves since important postal functions, including the historic main lobby and offices will be retained in the same section of the building with the rail passenger uses.</p>
<p>The intermodal hall is excellent; but recreating the rear wall of the old building is overly historicizing and the roof is unnecessarily elaborate and should be restudied in favor of a cheaper and better solution.</p>	<p>PSRC has worked closely with the New York State Historic Preservation Office (SHPO) to ensure that the design and historic preservation approach is in keeping with the Secretary of the Interior's Standards for the Treatment of Historic Properties. As part of the Section 106 historic preservation review process with the SHPO, PSRC studied many design and engineering alternatives for the Intermodal Hall skylight and it has been value-engineered.</p>

Stan Gee, Federal Highway Administration

<p>Suggested the need to add to the list of transportation projects on page 38 of the EA the \$185 million project of high speed rail improvements in New York State's Empire Corridor between New York City and Buffalo. The program includes remanufacture of seven turboliner trainsets and infrastructure improvements along the length of the corridor. The initiative is expected to increase ridership by 150% from 1.2 million to 3.0 million and to lead to reduced travel time, increased frequencies, and convenience with the new service.</p>	<p>FRA concurs with FHWA's recommendation that this project should be added to the list of transportation projects on page 38 of the EA.</p>
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