

A. INTRODUCTION

This document responds to all relevant comments on the Amended General Project Plan for the Moynihan Station Development Project that were made during the public hearing on Wednesday, April 28, 2010 at the Farley Complex and submitted during the subsequent written comment period that ended May 28, 2010.

**B. LIST OF ORGANIZATIONS AND PEOPLE WHO COMMENTED ON
THE GENERAL PROJECT PLAN AND TECHNICAL MEMORADUM**

ELECTED OFFICIALS

Thomas K. Duane, Member of the New York State Senate, 29th Senate District, oral comments (Duane)

Richard N. Gottfried, Member of the New York State Assembly, 75th Assembly District, oral comments and written submission dated April 28, 2010 (Gottfried)

Christine C. Quinn, Speaker of the New York City Council, 3rd Council District, oral comments (Quinn)

Scott Stringer, Manhattan Borough President, oral comments (Stringer)

COMMUNITY BOARDS

Manhattan Community Board 4, Lee Compton, oral comments (CB4)

Manhattan Community Board 5, Vikki Barbero, Chair, Community Board Resolution dated May 14, 2010 (CB5)

ORGANIZATIONS

34th Street Partnership, Dan Pisark, Vice President Retail Services, oral comments (34th Street)

AIA New York Chapter, Fredric Bell, Executive Director, oral comments and written submission dated April 29, 2010 (AIANY)

General Contractors Association of New York, Felice Farber, Director of External Affairs, written submission dated April 28, 2010 (Contractors)

Historic Districts Council, Simeon Bankoff, Executive Director, written submission dated April 26, 2010 (HDC)

Lackawanna Coalition, Endri Petrela, oral comments (Lackawanna)

Minority Business Leadership Council, Reverend Jacques De Graff, oral comments (MBLC)

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Municipal Art Society, Lisa Kersavage, Senior Director of Preservation and Sustainability, oral comments (MAS)

New York Landmarks Conservancy, Peg Breen, President, oral comments (Conservancy)

Partnership for New York City, Kathryn Wylde, President and CEO, written submission dated April 28, 2010 (Partnership)

Permanent Citizens Advisory Committee to the Metropolitan Transportation Authority, William Henderson, Executive Director, oral comments (PCAC)

Regional Plan Association, Juliette Michaelson, Senior Planner, oral comments (RPA)

Regional Rail Working Group, Joseph Clift, oral comments (RRWG)

INTERESTED PUBLIC

Edward Kirkland, oral comments (Kirkland)

Arthur Ladell, telephone message dated May 28, 2010 (Ladell)

Eric Muise, written comments dated May 28, 2010 (Muise)

James Raleigh, oral comments (Raleigh)

C. COMMENTS AND RESPONSES

GENERAL AND PROJECT PURPOSE AND NEED

GENERAL SUPPORT

Comment 1: Redevelopment of Moynihan Station will have a significant impact on the region's economy. Once completed, the new Moynihan Station will create a vibrant center for commuters, with grand public space, retail and amenities akin to Grand Central Terminal. It will also reinforce two other major transportation projects on the drawing board on the Far West Side of Manhattan: the extension of the No. 7 line, which will serve to further open up the Far West Side, and a much needed second commuter rail tunnel underneath the Hudson, known as Access to the Region's Core. With Amtrak's announcement to use the proposed terminal, the new Moynihan Station will also be the regional hub for long distance train travel on the eastern seaboard. (Partnership)

Response: Comment noted.

Comment 2: Conceived by one of New York's great public servants, Moynihan Station has become a symbol of both futuristic vision and prior impasse. The ability to reinvent this magnificent space as a mass transportation hub is brilliant in its architectural concept and consistent with our national policy of bringing people back to energy efficient forms of mass transportation. The project challenges all of us to look at our city and ask how can we enhance our future, strengthen our

public spaces and create an environment for economic growth and investment. After decades of fits and starts we are excited that this project is finally moving forward. We are here today to testify strongly on behalf of the revised General Project Plan. Agreement has been reached with Amtrak, funding is in place, and the project has been redesigned, allowing a stand alone transportation component of the larger development to move forward. (Contractors)

Response: Comment noted.

Comment 3: Turning the Farley Post Office into a train station worthy of entering the City of New York is long overdue. This civic project will be a catalyst to development and economic growth in the area, while promoting historic preservation and improving transportation access in the region. This project will help transform Hell's Kitchen South and Midtown Manhattan. I commend MSDC and the Port Authority of New York and New Jersey for their work. I support the project and am very pleased that it has emerged as a realistic development. (Gottfried)

Response: Comment noted.

Comment 4: CB4 has been a strong advocate of the development of Moynihan Station since the original proposal. We believe that the Project potentially creates significant community and City benefits, and that the current phased development plan offers the best opportunity to see the Project completed. And we are generally supportive of the General Project Plan. (CB4)

Response: Comment noted.

Comment 5: Phase 1 includes necessary and vital egress and ventilation work. And there's nothing to quarrel with. We hope shovels do go in the ground this year. We also hope that Phase 2 can start and run parallel with Phase 1 at some point. Phase 1 also includes plans for new entrances to the station at the Eighth Avenue corners. And we have always supported creating doors where these windows now exist, and creating a pedestrian area around the doors. Phase 2 is what the public will anticipate and appreciate the most. And we are delighted and relieved at the plans as we understand them so far. We're pleased that Amtrak will make Farley its home. (Conservancy)

Response: Comment noted.

Comment 6: Our enthusiasm is not just fueled by fuzzy nostalgia for the lost Penn Station. Putting Amtrak and long distance travelers in Farley will relieve the painful overcrowding of the current station, provide jobs, and be a stimulus for growth to the west of Farley. (Conservancy)

Response: Comment noted.

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Comment 7: Moynihan Station is crucial to alleviating the overwhelming congesting at Penn Station and increasing capacity and efficiency at the combined transit hub. By diverting approximately 20 percent of passengers from Penn Station to Moynihan Station, Amtrak, New Jersey Transit (NJT) and Long Island Rail Road (LIRR) commuters will be able to clear platforms faster, which will reduce train dwell time and speed up travel for all the rail lines that utilize Penn Station today. Furthermore, Moynihan Station will be a magnificent entryway to New York City. (Duane)

Response: Comment noted.

Comment 8: By transforming the Farley Post Office appropriately into Moynihan Station, we can show the world that New York values its history and sees grandeur and opportunity where others might only see an old building to be buried or demolished. After many false starts, this project is finally moving in the right direction. We must all work carefully to insure that it lives up to its promise. (HDC)

Response: Comment noted.

Comment 9: As you know, the Borough President has long supported the investment in Moynihan Station as a critical component of the City's regional transportation network. (Stringer)

Response: Comment noted.

Comment 10: The 34th Street Partnership fully supports the Amended Project Plan for the development of Moynihan Station and the many benefits it will create not only for Penn Station, but for the entire 34th Street District. (34th Street)

Response: Comment noted.

Comment 11: MAS believes that Moynihan Station is one of the most critically important civic projects in New York City today. A new Moynihan Station will create construction jobs in the near term, improve the capacity of Penn Station and the whole northeast corridor, and once complete, will be a catalyst for development on Manhattan's far West Side. We urge the adoption of the Proposed Amendment to the General Project Plan. We believe Senator Moynihan's vision can finally be realized through this rational and achievable plan, which prioritizes the development of the public spaces and improving infrastructure, then followed by private development. (MAS)

Response: Comment noted.

Comment 12: On behalf of the AIA New York Chapter and our 5,000 architect and affiliated members here in New York, I am here to commend the Moynihan Station Redevelopment Corporation and the Amendment to the General Project Plan. (AIANY)

Response: Comment noted.

Comment 13: Increasing rail capacity, improving linkage to the underground transportation hub of Penn Station, and creating new platform access west of Eighth Avenue to reduce pedestrian congestion in Penn Station are absolutely critical to my district and our City. (Quinn)

Response: Comment noted.

Comment 14: I'm here today to lend our enthusiastic support to the Amended General Project Plan which has been approved by the Moynihan Station Development Corporation. (PCAC)

Response: Comment noted.

Comment 15: For public transportation riders, however, particularly LIRR and NJT riders, but also subway riders and perhaps some future Metro North Railroad riders, the current plan for Moynihan Station is clearly beneficial. We strongly support moving forward with this project. (PCAC)

Response: Comment noted.

Comment 16: I am very happy that the existing Farley Post Office building will be redeveloped into the Moynihan station transportation hub. I fully support such a plan although I do have some concerns. (Muisse)

Response: Comment noted.

ADAPTIVE REUSE

Comment 17: Community Board Five supports the current proposal for Moynihan Station as a way to achieve what Senator Patrick Moynihan envisioned—a world class train station and transportation center for the 21st Century that also preserves New York's past through astute and protected use of a treasured landmarked and iconic building. (CB5)

Response: Comment noted.

Comment 18: The Historic Districts Council supports the creation of a train station within the Farley Post Office. Such an adaptive reuse, done in accordance with accepted preservation practices as defined by federal, state and local standards, would be

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a triumph for historic preservation and a sterling example of enlightened government planning. Many of our objections to earlier plans have been allayed by the present plan which no longer includes a new Madison Square Garden. (HDC)

Response: Comment noted.

Comment 19: As has often been stated, restoration and transformation of this now underutilized building for Moynihan Station will be a great gain for New York City and the traveling public. It will also ensure the preservation of the extraordinary historic structure and to some extent, make up for the loss of the original Pennsylvania Station. (Kirkland)

Response: Comment noted.

PHASE 1

Comment 20: With the US Department of Transportation's \$83 million award, implementation of Phase 1 will represent a critical first step in developing Moynihan Station. Phase 1 will allow for new access points, reduced platform congestion, and greater safety and security; all of which will provide New York City and its commuters with much needed amenities. (Partnership)

Response: Comment noted.

Comment 21: By dividing the project into manageable phases, portions of the redevelopment can finally begin which will lead to the transformation of the Farley Post Office into a dramatic, welcoming mass transportation entry into New York, one that will not only be a destination but an international attraction. Now is the perfect time to move Phase 1 into construction. With record high unemployment in the construction industry and historically low bid prices, moving forward with this project as quickly as possible makes economic sense. We simply can't afford to wait any longer for Moynihan Station. We hope that the revised General Project Plan is promptly approved and that the development of Moynihan Station is given the green light. (Contractors)

Response: Comment noted.

Comment 22: The proposed General Project Plan for Phase 1 is an improvement over previous proposals. The importance of catenary work, vertical access into Farley, platform extensions, and additional entrances are essential to both short- and long-term development. The current Penn Station is beyond capacity and does not work well. Widening the access platform on the West End Concourse will help mitigate overcrowding and layover time for the LIRR and NJT right away, while acting as a stepping-stone to transforming the Farley Building into

Moynihan Station. Phase 1 is not easy. Most of the work for Phase 1 occurs in close quarters in a busy operating train shed, and must be done with cooperation by Amtrak, MSDC, and the Port Authority. Therefore, we must work to ensure the project moves forward in a timely fashion and prevent it from being bogged down by federal bureaucracy. (Gottfried)

Response: Comment noted.

Comment 23: CB4 is especially pleased that Phase 1 is focused on those aspects of the Project that will have the greatest impact on Moynihan Station's transportation benefits. We applaud and support the proposed improvements to the West End Concourse, the 33rd Street connector and the new vertical access points. All of these underground improvements will contribute to improved passenger circulation, comfort and safety, as well as to shorten train dwell times and increase train system capacity. (CB4)

Response: Comment noted.

Comment 24: Phase 1 is a unique proposal that meets some of the City's most pressing infrastructure needs while balancing the historic preservation of one of New York City's most iconic buildings. The proposed Phase 1 will begin to address congestion at Penn Station, as well as provide much needed ventilation and electrical improvements. The Project will create new access points to platforms, widen existing passages to the Eighth Avenue subway and create station entrances through the Farley Building at street level for the first time. These improvements will have a positive impact on the commuter experience and allow for more frequent train service. The proposal, therefore, will ultimately serve to strengthen New York City's position as the region's commercial center. (Stringer)

Response: Comment noted.

Comment 25: We believe Phase 1 will bring the City closer to realizing a complete Moynihan Station, a spectacular gateway that our City deserves. (Stringer)

Response: Comment noted.

Comment 26: RPA enthusiastically supports the proposed Project Plan for Phase 1 of the Moynihan Station Project. Even just the first phase of the Project would provide valuable and tangible benefits to 400,000 daily commuters and long-distance travelers. (RPA)

Response: Comment noted.

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Comment 27: With thirteen more stairs, escalators, elevators up from the platforms to the stations, Phase 1 would significantly cut down these times and greatly increase the safety and security at the station. The West End Concourse and two new entrances into the station will save up to four minutes walking time for passengers headed to the Eighth Avenue subway, the west side of Midtown and the far West Side, an area, by the way, which is expected to receive 50 million square feet of residential and office space in the coming decades. Those passengers, tens of thousands a day, would be able to avoid using Penn Station altogether, significantly relieving congestion there for hundreds of thousands more travelers. Finally, a larger West End Concourse and 33rd Street connector will provide more space for passenger amenities, including seating, ticket vending machines and train information displays. (RPA)

Response: Comment noted.

Comment 28: Best of all, however, is the Project's time line. With funding lined up and designs nearly finalized, the construction start date of 2010, even if it's just for Phase 1, is the Project's most attractive feature. (RPA)

Response: Comment noted.

Comment 29: The General Project Plan's proposed phasing is what makes this project more manageable and achievable. Phase 1 will improve circulation and access to the platforms, laying the foundation for the construction of the new train hall. (MAS)

Response: Comment noted.

Comment 30: While I would prefer to have the entire project go through the City's Uniform Land Use Review Procedure, I understand that time is of the essence. The TIGER grant received from the federal stimulus package must be spent quickly and delaying Phase 1 would jeopardize this funding. (Gottfried)

Response: Comment noted.

Comment 31: I am pleased to support Phase 1 of the Moynihan Station Project which will increase rail capacity and significantly ameliorate platform and access congestion in Penn Station. The City of New York, the State of New York, and the entire region would benefit from these critical improvements. The benefits would not only extend to the economy, the business sector, and help to create new jobs, they would also improve our overall quality of life. (Quinn)

Response: Comment noted.

Comment 32: We're very pleased to see that Phase 1 of the Project is focused on reducing crowding through adding vertical access points and passenger circulation space on the west end of the existing train shed and on adding platform ventilation facilities, both of which rank high in the priorities of our LIRR riders. (PCAC)

Response: Comment noted.

Comment 33: We believe that the planned new entrances at the Eighth Avenue corners of the Farley complex will in themselves be a powerful force in more evenly distributing passengers entering and exiting the Penn Station platforms, and will significantly reduce overcrowding. (PCAC)

Response: Comment noted.

CONTINUED CONSULTATION

Comment 34: I respectfully request that ESDC further engage the community, my fellow local elected officials, and myself on details for Phase 1, such as placement of the ventilation infrastructure and construction plans, as more information is available. (Quinn)

As planning goes forward with Phase 2, HDC looks forward to continued opportunities for the public to review and comment upon proposed architectural designs and signage. Much of what was excessively objectionable from the previous proposal has been thankfully omitted from the most recent plans, but it is our understanding that much of the details of what is being proposed is still in a very unformed state. These details are key to the success of the larger project. (HDC)

I would like to commend the Moynihan Station Development Corporation and the Port Authority of New York and New Jersey for its thoughtful planning, historic preservation and public dialogue over the past several years. As we move forward with Phase 2, it is important that public dialogue is maintained and that there is continued opportunity for meaningful public input. (Stringer)

Response: MSDC has met with—and will continue to do so for Phase 2—Community Boards 4 and 5, elected officials, and various other groups and individuals. MSDC will also continue to meet with the established Community Advisory Committee to obtain input on the development of the Project. In addition, as part of the ongoing review process under Section 106 of the National Historic Preservation Act, MSDC will continue to consult with the Section 106 consulting parties at key points in the design phase of the Project.

As set forth in the General Project Plan, Phase 2 will be the subject of a further modified General Project Plan at the appropriate time. That further modification would be subject to the review and approval procedures set forth in the UDC Act.

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Comment 35: Since Phase 1 will be important work, but invisible to the public, or largely invisible, we agree it is important to let the public know that Moynihan is finally underway and that the train will someday come down that track. And we look forward to working with you on appropriate ideas on how to do that. (Conservancy)

Response: Comment noted.

Comment 36: Community Board Five notes that Phase 1 does not include the sale of any air rights for new development except that MSDC may do so to meet any financial shortfalls in its funding, and that Phase 2 will likely include extensive sale of air rights, and requests that any sale of air rights undertaken as part of Phase 1 include prior notification of Community Board Five. (CB5)

Response: Comment noted.

NEW YORK CITY'S UNIFORM LAND USE REVIEW PROCEDURE (ULURP)

Comment 37: Community Board 5 requests that any sale of air rights undertaken as part of Phase 2 and any new development associated with it involve the voluntary participation of MSDC and ESDC in New York City's ULURP (even though ESDC's and MSDC's government authority does not require them to do so) to ensure complete community input to this milestone project. But should they choose not to participate in ULURP, the Board asks that the ESDC and MSDC use other mechanisms to continue to give the community access and input to what will be a multi-year development effort. (CB5)

It is important that Phase 2 go through the City's ULURP process. Time is not an obstacle to this. The funding for Phase 2 is not contingent on timing, and construction will hinge on private interest, a better economic market, and a quality plan. Considering the millions of square feet of development that will be awarded through air rights transfers and rezoning, MSDC and the Port Authority should be required to comply with ULURP. We have recent precedent for public authority projects going through ULURP and being greatly improved because of it. The Metropolitan Transportation Authority put the West Side Rail Yards project through ULURP and thus will one day be a more inclusive community while respecting the surrounding neighborhoods. The Access to the Region's Core project has also improved during the review process and will help decrease congestion at Penn Station. Putting Phase 2 through ULURP would improve the result and ultimately strengthen public support. (Gottfried)

CB4 requests that Phase 2 of the Moynihan Station Project be submitted for ULURP review. We believe that ULURP is the best way to ensure transparency and to give the public the opportunity for substantive input into a major land use project. Phase 2 will have a dramatic impact on the immediate community and the City for generations to come. And we believe that the public review process

afforded by ULURP is both necessary and appropriate. We remind you that both the ARC project and the Western Rail Yards passed through ULURP and emerged better projects because of the public discussion. We hope that Empire State Development Corporation will follow the informed lead of the Port Authority, NJT and the Metropolitan Transportation Authority and agree to ULURP for Phase 2 of the Moynihan Station Project. (CB4)

I believe that all major land use projects in New York City should go through the City's Uniform Land Use Review Process even if such review is not legally required. ULURP, with its requisite community input, has served to strengthen countless projects, including the West Rail Yards, which, like Moynihan Station, was not obliged to undergo this process. While ideally Phase 1 of this project would have gone through ULURP, I understand that the accelerated time line did not make this possible. However, I strongly believe that Phase 2, which will have a much larger effect on the surrounding community, including the siting of millions of square feet of development rights, should be subject to the full public review process afforded by ULURP. This is critical to ensure that the community's interests are appropriately valued and incorporated into a final Moynihan plan. (Duane)

It would be critical that once a draft and General Project Plan is in place for Phase 2 that it goes through a public review process for which ULURP would be appropriate. (Quinn)

Response: ESDC has followed the procedures set forth in the UDC Act, which provide for public review and comment on the Project. In addition to forming a Community Advisory Committee, ESDC/MSDC have met with numerous stakeholders to discuss the project and solicit input, and will continue to do so as Phase 2 evolves. ESDC, as a state public benefit corporation, is not subject to the requirements of ULURP.

MINORITY AND WOMEN-OWNED BUSINESSES

Comment 38: Our concern is who will get the contracts and who will get the jobs. We support the goals of 20 percent minority M/WBE contractor opportunities, and 25 percent of the work force. We're very concerned that these goals are actually met. So we're calling for very strong enforcement mechanism and compliance regulations. We're very concerned that in the rush to put up a good project, that good ideas get thrown to the side under the guise of, we're trying to save money. Diversity is good for business. Putting New Yorkers to work is good for business. (MBLC)

Response: The proposed Amended General Project Plan sets forth the following at Section XI for the Project: ESDC's Non-Discrimination and Affirmative Action policies will apply; there is a 20 percent M/WBE contractor and/or subcontractor participation goal during development of the Project; and there is an overall goal

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of 25 percent minority and female workforce participation during construction of the Project.

Comment 39: We would call for a Project Labor Agreement to govern this project and we bring some experience with this. We're concerned that minority-owned firms don't have to pay a double burden for health benefits for workers that they bring along to work on these projects as they become unionized during their length on the Project. And so we think that good people of good will can find a way to make a difference so that we can perhaps suspend the rules during those times so that minority and women-owned firms have an equal opportunity to participate in these projects. (MBLC)

Response: Comment noted.

REGIONAL PLANNING AND OTHER TRANSPORTATION PROJECTS

Comment 40: Connecting to Moynihan Station with the new ARC tunnels is an ideal opportunity to improve regional planning. There's only a couple of problems. NJT seems to be isolating themselves from this project as much as they can. And I question the involvement of the Port Authority of New York and New Jersey. The documentation that we have to review, I think mentions the NJT ARC Project only three times. And I think there are three footnotes that reflect NJT's reservations about the plan. We want to make sure that in what you're doing with the train level access, that future development of flexible regional planning is not impeded. (Raleigh)

Response: As part of the planning and design for Moynihan Station, MSDC has been engaged, since the inception of the Project, in extensive and ongoing consultation with NJT, Amtrak, LIRR, New York City Transit, and the Metropolitan Transportation Authority.

Although Moynihan Station and ARC are separate projects, they have been designed to create concourses and direct passenger connections between Penn Station, Moynihan Station, and ARC's new 34th Street Station. Though Amtrak will be the primary user of Moynihan Station, NJT customers will be able to access Tracks 5-16 and will have the future potential to access Tracks 1-4, with additional infrastructure, which would not be possible without the West End Concourse extension. The Port Authority of New York and New Jersey is fully engaged in the Project, and continues to work in close coordination with MSDC in planning, design, engineering, construction, and funding of Moynihan Station.

Comment 41: We are aware that the proposed deep cavern terminals for the LIRR and for NJT will prove so costly that it would use up all the money that could be spent for the potentially superior Moynihan Station Project. (Lackawanna)

Response: East Side Access, ARC, and Moynihan Station are each funded separately through a variety of federal, state and local sources, and as set forth in the Amended General Project Plan, Phase 1 of the Moynihan Station Development Project is fully funded.

Comment 42: There are two mega projects underway right now. ARC, which is the NJT project, priced just over \$10 billion coming into 34th Street. Their numbers indicate that somewhere above fifty percent of their riders will be moved into that station. That means Penn Station will lose over half the Trans-Hudson riders it has today. East Side Access, which is the LIRR Station under Grand Central, they estimate will move 45 percent of the existing passengers out of Penn Station. That's another \$8 billion. They haven't said it yet, but we understand it's going up over \$8 billion. So you've got close to \$20 billion worth of our money being invested in two projects, and the net effect on Penn Station is to take half the ridership out of Penn Station. The need for [more] capacity at Penn Station with these two projects in place just simply does not appear to be there. (RRWG)

They talk a lot in the presentation about capacity improvements. Amtrak has indicated that they do not believe that Phase 1 will enable any more trains to come into Penn Station in the morning. They think with Phase 2 they'll move their short Empire corridor trains, the Albany trains onto what they call platform 12, which is where the Post Office used to have their operations under the Farley Building. And that will allow an additional train to come across the Hudson River to replace that Empire corridor train. If you're looking for train capacity, apparently Moynihan Phase 1 does not do it. (RRWG)

Response: As documented in the Technical Memorandum, Penn Station is a congested facility with constrained capacity. Even with LIRR's East Side Access and NJT's new ARC Station, long term forecasts for ridership at Penn Station are expected to return to today's congested and constrained levels by 2030/2035. Thus, within the context of these other regional transportation improvements, the Moynihan Station Development Project will provide valuable and needed enhancements to station circulation capacity and comfort over the long-term. Phase 1 of the Project will substantially increase the number of vertical access points, improve platform clearance times, and allow for more efficient station operation.

Comment 43: The major beneficiary of Phase 1, which is NJT, is not putting a penny into this project, not a single dime. Amtrak is also not putting money in. And you could argue Amtrak is poverty-stricken. NJT is going to have to pony up around \$7 billion of money they control for ARC. They are not broke. It's simply what they're spending it on. The MTA is putting in \$35, I think it is \$35 million into the project. They just threw out 160 capital projects from their capital program,

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because they had to cut \$400 million. So \$35 million from the MTA represents fourteen of those projects. There is no direct benefit to the LIRR from Phase 1 because they already have a West End Concourse. The MTA's \$35 million, I would argue, is the state telling the MTA to move \$35 million of MTA money over to ESDC. As I said before, that's fourteen projects that won't get built. My solution to that \$35 million shift, go to NJT, ask NJT to put \$20 million into this project. They are the principal gainers. Tracks 5 through 12 are the tracks that will gain access to the new east side—to the new West End Concourse. Those are the tracks that during peak hour NJT uses. (RRWG)

Community Board Five recommends that NJT, which at one point was to be the main tenant at Moynihan Station, and whose passengers will receive increased ease of use and numerous other benefits and amenities, and moreover will be adding significant pedestrian and transit traffic to the Station and the area overall after the completion of its ARC Project, be required to contribute funds to this regional transit project as a condition for having access, and in an amount that is commensurate with its likely benefits. (CB5)

Response: The Phase 1 improvements will benefit all the operating railroads and all passengers and pedestrians using Penn Station by enhancing the circulation capacity and comfort of the West End Concourse in particular, and the Penn Station Complex as a whole. In addition, it will also improve access and circulation for rail passengers with origins and/or destinations west of Eighth Avenue to Penn Station and the Eighth Avenue subway.

Although the funding for Phase 1 is in place, sources for funding of Phase 2 have not yet been fully identified.

Comment 44: At the present time, NJT plans to build a deep cavern tunnel 175 feet below 34th Street. This terminal would constitute a waste of more 3 billion of our scarce dollars and would be unsafe and inconvenient, far from Amtrak and other NJT trains. It would also effectively preclude east side access for rail riders on our lines. And it would render efficient through-running of the trains, as practiced in Europe, impossible. Worse yet, riders on our lines will be forced out of the existing Penn Station under the current plan. Moynihan Station could be the answer, but the station plan must be enhanced to allow easier operation for NJT and Amtrak. It should allow trains from all directions, from the suburbs and distant cities to connect with each other and to bring people to a place where they can enjoy convenient connections or celebrate arrivals. Riders also deserve a station designed for further extension to the east side so they will have easy access to the entire Manhattan region. This can only occur with design improvements in Phase 1 that would maximize passenger convenience and operating flexibility. (Lackawanna)

Response: NJT's ARC station will have connections to Penn Station at Seventh and Eighth Avenues. Other regional transportation improvements that would further

improve inter-railroad connectivity exceed the scope of the proposed Moynihan Station improvements (Phase 1 and Phase 2 combined), but are not precluded from future consideration as a result of Phase 1.

Moynihan Station will not impede the ability to operate through-trains in the future, nor will it impede any further improvements to Penn Station. In fact, through running of trains is something the railroads are currently experimenting with (i.e. football trains) and may be expanded in the future. Should the railroads choose, Moynihan Station could become the passenger focal point of such service.

Comment 45: We call for a Moynihan Station that would serve all the rail carriers of our region; Amtrak, NJT, the LIRR, and future service on Metro North. (Lackawanna)

Response: As described in the Technical Memorandum and Amended General Project Plan, Moynihan Station at the Farley Complex will provide access for and benefits to Amtrak, LIRR, NJT, and New York City Transit. In addition, the completion of Phase 2 and the opening of Moynihan Station will potentially facilitate Metro-North's Hudson Line entry into the Penn Station Complex.

PROJECT DESCRIPTION

Comment 46: Community Board Five requests that as Phase 1 is implemented and Phase 2 is planned, that efforts be made to have (Americans with Disabilities Act) ADA-compliant access at every entrance to Moynihan Station as well as transfer points between the Station and other transit. (CB5)

Response: It is intended that all new entrances to Moynihan Station through the Farley Complex will be ADA compliant. In addition, as described in the Technical Memorandum, the 33rd Street connecting passageway between the West End Concourse, the Eighth Avenue A, C, and E subway line, and Penn Station's connecting concourse under West 33rd Street would be widened to full ADA standards for both the east and west ramps of the connector.

Comment 47: I urge you to make all subway platforms at the 34th Street and Eighth Avenue subway station ADA compliant, as well as to the existing New York Penn station. These improvements will also benefit riders with heavy luggage. (Muisse)

Response: The 33rd Street Connector under Eighth Avenue will be improved to be ADA compliant. The subway platforms of the Eighth Avenue station are outside the bounds of the Moynihan Station project and under the jurisdiction of the Metropolitan Transportation Authority and New York City Transit.

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Comment 48: The ventilation shafts that will be installed along 31st and 33rd Streets are of community concern. While essential to the function of a train station, consideration must be made for the neighborhood, both environmentally and visually. (Gottfried)

Response: The new platform ventilation system will consist of grates located within the moats adjacent to the Farley Building and in the sidewalks adjacent to the Western Annex. It is currently anticipated that there would not be a need for above-grade ventilation exhaust structures. The Technical Memorandum has been updated with expanded descriptions of the ventilation system. In addition, the mechanical ventilation system would only be used for short durations in emergencies and for periodic testing and, therefore, would not result in any substantial adverse environmental impacts.

Comment 49: As we progress to planning and designing Phase 2, we should be mindful not to overlook potential opportunities for vacant spaces currently within the Farley Building. During Phase 1, which will begin hopefully at the end of this year and will be completed by 2015, much of the upper level office space, as well as the former mail-sorting room, may remain usable but lack a designated user or plan. We should begin a public discussion on potential interim uses for those spaces that could meet community and/or City needs. By keeping this site active and vital, we can ensure that during construction the Farley Building will continue to contribute to the vibrancy of the neighborhood. (Stringer)

MAS believes the annex offers a truly unique opportunity for an exciting reuse. And we urge MSDC to consider uses beyond big box retail. MAS would like to be part of creating a vision for this reuse of the annex, one that would offer sustainable, economic development solutions for the City. (MAS)

Response: The Technical Memorandum analyzed a reasonable worst-case mixed-use development program for the entire Farley Complex in addition to Moynihan Station. A further modification to the General Project Plan will be proposed with respect to Phase 2 of the Project, which will undergo public review in accordance with the process set forth in the UDC Act. That modification to the General Project Plan will describe the uses proposed for the Western Annex, as well as other components of Phase 2 of the Moynihan Station Development Project. The comment with respect to interim uses is noted.

Comment 50: NJT has raised a question about platform No. 12 and the use of it by the Empire Line and possible interference with Tracks 1, 2, 3 and 4. (Raleigh)

Response: As set forth in the Technical Memorandum, the issues raised by NJT with respect to Platform 12 have been addressed and will be resolved in the course of ongoing discussions with the affected railroads.

Comment 51: The drawings show potential future construction not in scope [at Platforms 1 and 2]. I understand that. But I think that to fully appreciate the benefits of the track level work, we need to talk a little bit more about what can be done on the south side of the new West End Concourse. (Raleigh)

I'm here today as the official representative of the Lackawanna Coalition to state that, while we strongly support and applaud the Moynihan Station Development Corporation's decision to develop a first phase of the Moynihan Station Project focused on mobility and infrastructure improvements, we cannot support Phase 1 of the Moynihan Station Project in its present form. The purpose of the Moynihan Project should not just be to build a great train station, but also a station that will connect all of us by rail. It should connect New York and New Jersey, the suburbs of the City and the local rail with Amtrak. Phase 1 of the Project as presently constituted does not meet this standard. It does not include either detailed planning for, or the actual extension of, the platforms serving Tracks 1 through 4 under Eighth Avenue to full 12-car, 1020' length, which would enable these platforms to connect to the proposed Phase 1 extension of the West End Concourse, and also permit any train of any length to access these platforms. Since the current plan will deny more than half of NJT's riders access to the West End Concourse and the convenience it would allow, it would also continue to limit NJT's flexibility by allowing only short trains on Tracks 1 through 4. (Lackawanna)

We call for a station where any track can accommodate any train of any length. With the enhancement described here, the new station would be able to accommodate all of NJT's needs, as well as Amtrak's. (Lackawanna)

The fact that this project does not connect to Tracks 1 through 4, the RPA speaker said that people would save time. Over half NJT's customers come in on Tracks 1 through 4. They won't save a minute. The fact that this is not set up to do that I think indicates on one hand, NJT's decision to invest nothing in Penn Station. But I think also it needs to be designed in. (RRWG)

The design for lengthening the platforms that serve Tracks 1 and 2 needs to be shown how they're linked into full 12-car train lengths so NJT has total operating flexibility. And they need to show how the stairways would connect up to the extended West End Concourse. Even if it's not spent now, it's very likely that what's done in Phase 1 could preclude or make far more expensive taking that action. (RRWG)

As I take NJT rail daily in and out of New York Penn Station, I am disappointed that the planned extension of the concourse, under the Moynihan station, will not connect to Tracks 1 through 4, which are heavily used by NJT. As I live in Midtown West, the new Moynihan station will thus not improve my commute as I will still have to walk to the existing New York Penn station to get on NJT trains on Tracks 1 through 4. I thus urge you to extend the platforms serving Tracks 1 through 4 to connect to the newly extended concourse. This will have

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the added benefit of accommodating longer trains on these tracks thus facilitating operations to allow more trains to come in and out of the station. (Muisse)

Response: The Project would not preclude connections between the expanded West End Concourse and Platforms 1 and 2 (serving Tracks 1-4). NJT has developed some preliminary designs for such improvement, and these connections may be built as part of a separate project at a later time.

It should be noted that the only way to extend Platforms 1 and 2 is to the east, which is not a part of the Moynihan Station Development Project.

Comment 52: The ARC project originally was going to bring tracks into Penn Station. Both Community Boards 4 and 5 have stated they still want that to happen. It's not going to happen under the current plan. Amtrak always thought they would get additional tracks into Penn Station. Right now on the weekends, if you take trains on the weekends, you know this, they have one tunnel in operation, 30 minutes westbound, 30 minutes eastbound. If your train is late, it sits for 30 minutes. It can sit anywhere in that case. They have to do that because the second tunnel under the Hudson River's being worked on. And they have told us that this will happen forever. They have so much work to do in that tunnel. It's 100 years old, they're making improvements to it. The insides of the tunnel are not 100 years old, but they have to make improvements. And if they don't get a third and a fourth tunnel into Penn Station, they will be faced with thirty minutes eastbound and westbound all weekend. And during peak hours, if there's a problem in one of the tunnels, and anyone that's come from New Jersey has experienced this, you're screwed. There's only one tunnel in and one tunnel out. And so they always thought they get the redundancy and flexibility. It's not going to happen. When they knew they were not going to get that access to Penn Station, they said we want to build, eventually, we will need to build a fifth and sixth tunnel across the Hudson River. They have a plan called 780 to bring them into Penn Station. The fact that Phase 1 does not show how tracks would come from New Jersey under the Hudson River through the existing trackage west of Penn Station and under the post Office, could create the problem, that in the future if they want to build that, maybe the ventilation equipment that's being built as part of Phase 1 would be a problem. But clearly, the failure to include that could create a problem. It should be included. Doesn't have to be built. It needs to be designed in and a space given for it. (RRWG)

The current Phase 1 Plan does not include detailed plans for the connection of two additional trans-Hudson tunnels into Penn Station, such as proposed by Amtrak in its 780 plan, or as presented in the ARC DEIS plan. Absent this addition, there is no proof that Phase 1 will [not] interfere with the construction of such connection, construction that Amtrak has stated will be required at some future date to provide increased flexibility and capacity given that the planned

ARC Trans-Hudson tunnels no longer include a connection to Penn Station. (Lackawanna)

Response: The regional transportation improvements identified in the comment exceed the scope of the proposed Phase 1 improvements, but are not precluded from future consideration as a result of Phase 1.

Comment 53: We anticipate that a truly intermodal transit center will include not only Amtrak's long distance rail, well-connected regional rail, commuter rails, including both LIRR and NJT, and obviously the connections that would be enhanced to the subways, but also such potential uses as a major bicycle parking, storage and repair center. Such facilities have been developed recently in cities as different and distinct as Chicago and Washington, D.C. And we think that this would be an excellent place for such a connection for people who are increasingly commuting by bicycle to occur here in New York. (AIANY)

Response: Comment noted.

Comment 54: I'm quite concerned in the bigger plan about how flexible the signage is going to be between these various stations. I think the wording in the documents today about compatibility with the ARC project belie the fact that if we proceed with two stations, we have nothing but a lot of confusion at the street level and within the stations. (Raleigh)

Response: A signage program for Moynihan Station will be developed that clearly identifies the station at street level and wayfinding within the new station.

Comment 55: We are very pleased to see that this plan brings back the 32nd Street pedestrian corridor and creating an entrance on Ninth Avenue. Providing such an entrance anticipates future growth on the far West Side where we have the potential of a new business and residential district the size of downtown Seattle. (MAS)

Response: Comment noted.

Comment 56: If you build the expansion of the West End Concourse, it's going to be really tough on the current users of these tracks right now. So my proposal is, don't expand this portion. Don't make it wider. Just extend the existing down the same width. The only choke point, the only real congestion problem is up here. And it shows that they will be adding space. I think that's to come down from the stairway that's in the moat area at the street level. But don't expand this. Just build this the same width. The LIRR went to a lot of trouble to figure out how to fit the West End Concourse in cost effectively. They did it. It works well. You're not going to have more tunnels into Penn Station from New Jersey, so the number of trains arriving is not going to be any more. So you save the other

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\$15 million by not expanding the width of the concourse. You also avoid the LIRR customers getting the shaft during the construction period. (RRWG)

Response: The West End Concourse will remain operational during construction; such construction will be managed and coordinated with the operating railroads. The improvements will be a benefit to all users of the West End Concourse as these improvements will enhance pedestrian capacity and circulation. Widening the concourse will provide for additional pedestrian circulation capacity necessary for Phase 2 of the Project.

Comment 57: You have not provided for the 30,000 people a day who would go to the World Trade Center Memorial by 2011, many of them through Penn Station to the E train and you need access and egress at least equal to an escalator at either end of the platforms. The E train is the most direct route from Penn Station and it really needs escalators and ramps from the train platform. (Ladell).

Response: The improvements to the 34th Street-Penn Station subway station requested in the comment are beyond the scope of the Moynihan Station Development Project. Anticipated increases in rail and subway ridership in the future without the proposed Project were considered in the pedestrian circulation analysis of the Technical Memorandum.

HISTORIC RESOURCES

Comment 58: We're pleased that the Project no longer seems to threaten Farley's architectural integrity, that you promised to keep the exterior fabric and interior walls, that there will not be a tower over the annex, and that a new roof line will not overwhelm the station. (Conservancy)

Response: Comment noted.

Comment 59: We look forward to seeing real plans for the Station and applaud your goal of obtaining significant preservation tax credits for the effort. We're also very pleased that the post office will stay in its beautiful lobby. (Conservancy)

Response: Comment noted.

Comment 60: The Section 106 proceedings provide an opportunity to consider the impact of proposed impacts on the historic Farley Building, an iconic McKim, Mead and White building. Most of these improvements will occur below Eighth Avenue and the Farley Building and will be unlikely to have significant impact. The proposal will preserve the Farley Building's most historic features, the facade, the monumental stairs and its Corinthian columns. Further, the proposed program will allow the continued operation of the historic use on site, the Post Office in the lobby. While some changes to the building's exterior are proposed,

these minimal alterations have been thoughtfully designed and result in significant public benefit, including new access points, new public circulation space and approved ADA accessibility. (Stringer)

Response: Comment noted.

Comment 61: We applaud the Moynihan Station Development Corporation's stated commitment to preserve the landmark Farley Post Office Building. The plan to pursue federal historic tax credits is a good one and it will ensure the preservation of the building and bring valuable federal funds to the Project. (MAS)

Response: Comment noted.

Comment 62: We applaud the Section 106 proceedings and the participatory process that allows those who will use Moynihan Station to look closely at the concept and at the details. (AIANY)

Response: Comment noted.

Comment 63: Community Board Five asks that if any changes are planned for the facade of the Farley Building or should any other landmark issues arise either in Phase 1 or Phase 2 that the MSDC return and review these changes with Community Board Five prior to finalizing them. (CB5)

We appreciate the need for haste in starting the Project, but we would have preferred greater detail about the proposed changes to the exterior of the Farley Building. We ask to be included as designs for these elements are developed. (CB4)

An area of great interest for me in both Phase 1 and 2 is the treatment of the historic Farley Building, designed by the renowned firm McKim, Mead and White, the firm that also designed the original Penn Station. MSDC has gone to great lengths to ensure that Phase 1 alterations to the building are as contextual as possible. As MSDC moves forward with Phase 1 and begins the design and approval processes for Phase 2, I request that MSDC continue to work closely with all concerned parties to ensure the highest level of historical sensitivity, especially with regard to any new signage. (Duane)

Regarding the street level entrances on 31st and 33rd Streets at Eighth Avenue: although no designs have been released, it is important to make sure that the changes to the building's moat walls and widening of windows will be respectful to the building's current aesthetic. MSDC and the Port Authority have both acknowledged how closely they intend to work with the State Historic Preservation Office (SHPO) and preservation advocates around the City to ensure that the alterations do not affect the integrity of the building. Knowing

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federal tax credits are at stake if alterations go awry reinforces the effort by MSDC and the Port Authority to do the right thing. Nonetheless, when designs are released for the entrances, public input must be heard. Preservation advocates and many of us have concerns about how signage and other possible elements will affect the facade below the monumental steps. (Gottfried)

HDC's main concern now regards the two new above-grade entrances proposed to be cut through Farley Post Office's Eighth Avenue facade. We urge that their insertion does not disturb the symmetrical layout of the landmarked facade. In addition, more details regarding the design and installation of signage, canopies, and the doors themselves are needed. HDC requests that as those details are developed they be brought for the review of interested parties, including the Landmarks Preservation Commission. (HDC)

While no drawings have been made available showing the changes to historic features, three issues are clear: the newly created entrances should involve the minimum necessary removal or disturbance of historic fabric required for the conversion from windows, and the design should reflect the plainness of the historic opening; lighting fixtures should be unobtrusive and harmonious with the building, and lighting consistent with other lighting on the facade; and signage should be the minimum required. And the lettering should be derived from the existing lettering on the building, such as that of the famous inscription above. (Kirkland)

Response: As described in the response to Comment 34 above, MSDC will continue to consult with the Section 106 consulting parties at key points in the design phase of the Project. The amended Section 106 Programmatic Agreement for the Project will describe the procedures for this continued consultation.

As described in the Technical Memorandum, a signage program for Moynihan Station will be designed in consultation with SHPO as stipulated in the amended Programmatic Agreement. The Section 106 consulting parties will also have opportunities to review the signage program.

As described in the Technical Memorandum, the new Eighth Avenue entrances will be designed in consultation with SHPO. In addition, the Section 106 consulting parties will also have opportunities to review the design of the new entrances.

Comment 64: We recommend the Project go through the New York City Landmarks Preservation Commission review, as the original Moynihan Station Project did in the 1990's. (MAS)

Response: SHPO is the primary agency responsible for acting on New York State actions regarding the Farley Complex. The New York City Landmarks Preservation Commission (LPC) is participating in the Section 106 process as a consulting party.

Comment 65: It is disconcerting that there is no mention in the General Project Plan of the type or size of the vents, nor a specific location. Though the vents would only be used during an emergency, their design should respect, and not scar, the building. Considering the scope and detail of the plans, it is difficult to believe that MSDC and the Port Authority are unsure of where these vents will be. (Gottfried)

Other possible impacts in Phase 1 may be created from the bending upwards towards the moats of ventilation equipment, planned to be located next to the tracks beneath the Farley Building, that are to be accessed by construction in this phase. Such impacts should be as, on the historic properties, should be as minimal as possible. This issue was not discussed in the Section 106 presentation. If significant impacts on historic features will be created, a further Section 106 action should take place. (Kirkland)

I am confident that the plans for the external ventilation will be forthcoming and take into account the community's demand that they be as unobtrusive and inconspicuous as possible. (Duane)

As the Project proceeds, several details still require finalization such as the physical form of the remaining western platform emergency ventilation systems. As these details are finalized, consideration should be given to minimize the impact on the historic structure and the surrounding community, as was done with the eastern platform emergency ventilation system. (Stringer)

The Project calls for emergency exhaust vents to be positioned within the moats. Our preference is that these modifications involve only the minimum necessary removal or disturbance of the historic fabric. We received verbal assurances that the vents will not be towers, but little beyond that. (CB4)

Response: As described in the response to Comment 48 above, the new platform ventilation system will consist of grates located within the moats adjacent to the Farley Building and in the sidewalks adjacent to the Western Annex. These ventilation grates will be included in the designs presented to SHPO and the Section 106 consulting parties as part of the ongoing Section 106 consultation process.

Comment 66: The moats, with their rows of rectangular windows, separate most of the building along 31st and 33rd Street from the sidewalks and are an important part of the original design. They recall the original open spaces and tracks, above which the Post Office was erected. The original structure and much of the annex building have always been isolated by these spaces from the streets and their changes in level, especially 33rd Street to the north. And this is part of the architectural effect and historical character of both parts of the structure, that is, the original Post Office and the annex. The only impact on this character designed so far in Phase 1 is the creation of new street level entrances to the

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station at the corners at Eighth Avenue and 31st and 33rd Street. The original footprint of the property, as defined by the moat walls, should be clearly indicated. This might be done by marking the footprint of the moat walls in the services of the new walkways leading from the sidewalks to the new entrances by placing slabs of moderate thickness, cut from the granite removed from the moat walls in the early part of the process, along the footprint of these walls in the new walkway. (Kirkland)

Response: As described in the Technical Memorandum, some form of architectural treatment, such as a special paving, will be explored to mark the location of the removed moat walls, if requested by SHPO.

Comment 67: For the construction of the Train Hall in Phase 2, design elements in earlier plans can certainly provide some inspiration, especially for features like allowing natural light to reach the platforms. We urge the preservation of the steel trusses in the new Train Hall, as they can contribute to the architectural character of the new station. (MAS)

We encourage you to make the historic trusses a feature in the train hall. It doesn't matter that the public hasn't seen them. They represent the innovative engineering of their day and would be an attractive reminder of the history of the building. (Conservancy)

Response: As described in the Technical Memorandum, removal of the work room roof and the construction of a new roof system would create a more open and light-filled train concourse than if the existing roof trusses were retained under the Project.

TRANSIT AND PEDESTRIANS

Comment 68: We have observed the continued revitalization and growth of the district. As the area has gained popularity with shoppers and visitors, severe sidewalk crowding has sharply increased. We are all too familiar with the issue of congestion and its potential for creating unsafe and dangerous conditions, particularly in the vicinity of Penn Station. There is every indication that the development potential from Seventh Avenue westward to the Hudson, will intensify and will no doubt worsen those conditions, especially during the peak morning and evening commuter rush hours. Penn Station is critical to the life and the future growth of the 34th Street district. As you know, Penn Station is excessively overcrowded and congestion will increase with the development of the Hudson Yards. Such features as the new access points to the train platforms directly below the Farley Building, two new entrances to the station directly from Eighth Avenue at the 33rd and 31st Street corners, and a substantially widened and improved underground connection between the West End Concourse, the Eighth Avenue subway, and the 33rd Street connector to Penn Station, will be

instrumental in solving our current and anticipated pedestrian traffic issues. (34th Street)

Response: It is acknowledged that the new and improved pedestrian circulation elements being provided as part of the Project (including an expanded West End Concourse, new station entrances and new train Hall in the Farley Building, and widened and improved 33rd Street Connector, among other project elements), as described in the Technical Memorandum, will enhance and ease pedestrian circulation into, out of, and within the Moynihan/Penn Station Complex, will help to alleviate some of the anticipated future congestion from area development and increased railroad ridership that will be using the Moynihan Station and Penn Station facilities. It is noted that the pedestrian circulation analyses in the Technical Memorandum account for the railroad ridership and area development increases that are projected to occur by the Project's 2015 build year.

CONSTRUCTION

Comment 69: Community Board 5 asks the MSDC make every possible effort to mitigate the impact of Phase 1 and Phase 2's construction on the neighborhood's already intensely stressed vehicular and pedestrian traffic. (CB5)

Response: Comment noted.

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