Chapter 2: Purpose and Need

2.1 INTRODUCTION

This chapter of the EA provides an overview of the Project, identifies the currently existing problems the Project is intended to address, describes previous plans for the Project site, and states the Project purpose, goals, and objectives. Chapter 3, "Project Alternatives" of this EA describes the Preferred Alternative for the Project and discusses project alternatives that have been considered.

2.2 PROJECT IDENTIFICATION

The approximately 1.3-million-square-foot Farley Complex occupies a superblock from West 31st to West 33rd Streets and from Eighth Avenue to Ninth Avenue in the Borough of Manhattan, City and State of New York (see Figure 2-1). Built over the Pennsylvania Station (Penn Station) rail facilities, including the westernmost portion of most of the passenger platforms and other rail yard facilities, the Farley Complex is integrated into the larger Penn Station Complex. On March 30, 2007, ESDC purchased the Farley Complex from the USPS. The FRA is serving as the lead federal agency for the redevelopment of the Farley Complex based on its role in project funding and as the federal agency that oversees Amtrak's programs.

As described below, planning for a new intermodal transportation facility began in 1991, because of the intensive utilization of Penn Station and its projected ridership increases. The Penn Station Complex is America's busiest passenger transportation facility, handling over 530,000 people daily. Yet the present terminal, a three-level, largely subterranean complex constructed after the demolition of the original station in 1965, is inadequate to meet the needs of today's passengers. Already operating at capacity, Penn Station is expected to experience significant operational stress in coming years because of increasing demand for service and a growing passenger load.

The purpose of the Project is to create a major transportation hub that improves circulation and relieves capacity constraints in the Penn Station Complex, restores and preserves an important historic resource (the Farley Complex), and creates a dynamic mixed-used development opportunity in the Hudson Yards area that supports City and State planning and development policies for West Midtown Manhattan. The new train station would, in addition, greatly expand connections to existing rail infrastructure and passenger operations in the Penn Station Complex.

2.3 EXISTING CONDITIONS

PENN STATION COMPLEX

The original Pennsylvania Station, which was built in 1902-10, was demolished in 1965, destroying one of New York City's most notable structures. The current Penn Station was completed in 1968, and lies to the east of the project site on the superblock between West 31st

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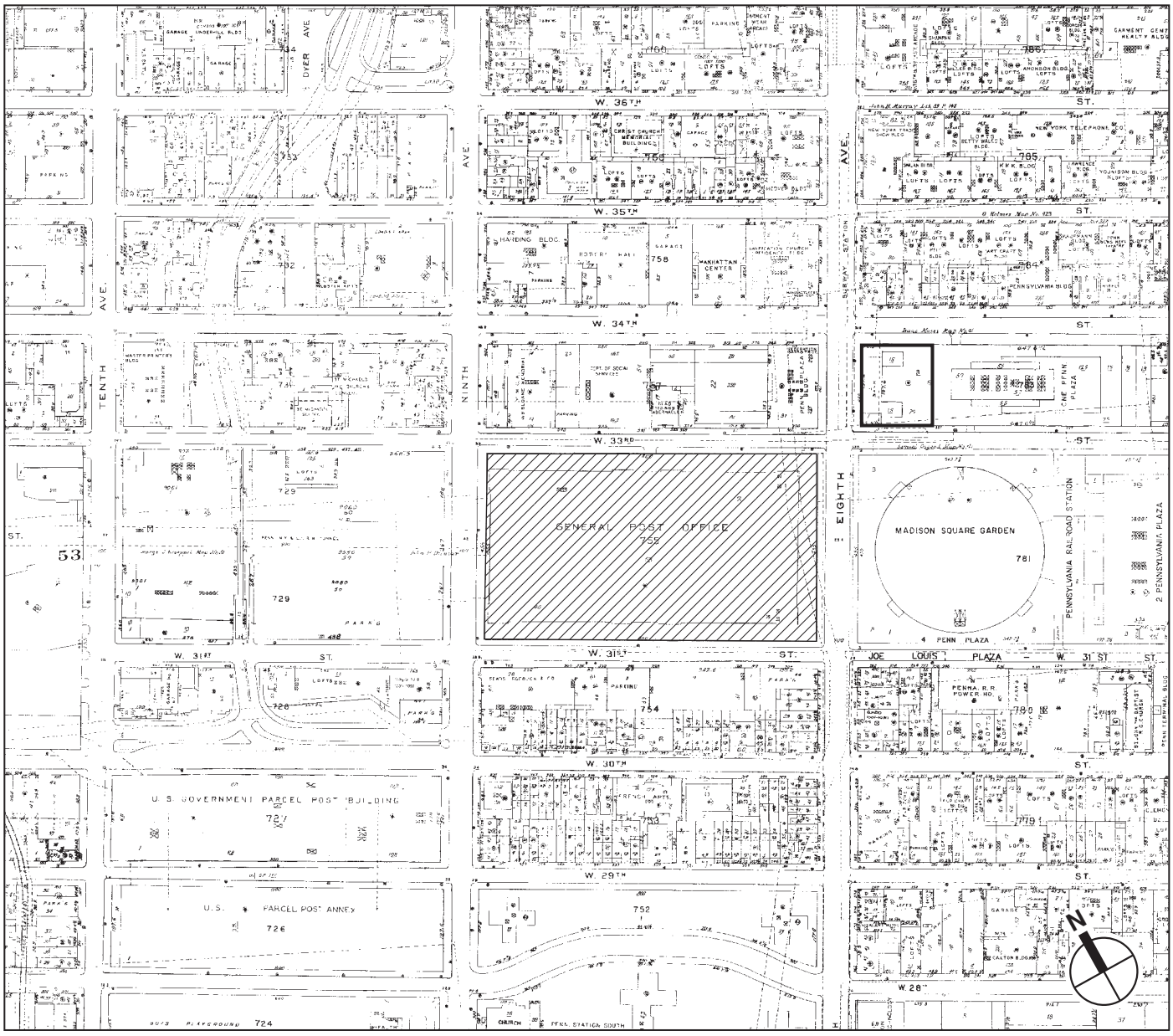

Farley Complex

Development Transfer Site

0 400 FEET

SCALE

Project Site Location

Figure 2-1

and West 33rd Streets and Seventh and Eighth Avenues. It provides regional commuter and inter-city train services, as well as subway access. Amtrak provides inter-city distance services along the Eastern Seaboard and beyond, while NJ Transit (NJT) and Long Island Rail Road (LIRR) trains provide regional commuter rail service.

The Penn Station inter-city rail passenger terminal facilities span a four-city-block area beneath Two Penn Plaza (an office building), Madison Square Garden, and the Farley Complex. The Penn Station Complex includes various below-grade connecting passages: the tracks and operations facilities serving the passenger terminal; the tracks and mail platform serving the Farley Building that lie below street level; and connections to the Eighth Avenue (A, C, E) and Seventh Avenue (1, 2, and 3) subways. The Penn Station Complex also includes a service building for Amtrak on West 31st Street between Seventh and Eighth Avenues. From their inception, Pennsylvania Station and the Farley Complex have been integrated facilities directly dependent upon the railroad tracks and platforms below them. The interrelationship of these two buildings has permitted the transfer of mail and cargo within the Penn Station Complex. The physical relationship of tracks and platforms support Amtrak's intercity rail service, the postal operations, and the commuter rail services of the LIRR and NJT. The commuter authorities operate within the Penn Station Complex as lessees from Amtrak.

JAMES A. FARLEY COMPLEX

The Pennsylvania Terminal Building was constructed between 1910 and 1912 and opened in 1914 by the U.S. Post Office. It was renamed the General Post Office Building in 1918 and later renamed the James A. Farley Building in 1962. It was designed as a companion to the original Pennsylvania Station, which was located just across Eighth Avenue. It was expanded in 1934 when the Western Annex was constructed; together, the annex and the original Farley Building form the Farley Complex. The architectural firm of McKim, Mead & White designed all three structures: the original Pennsylvania Station, the Farley Building, and the Western Annex. The Farley Complex is listed on the State and National Registers of Historic Places and is a designated New York City Landmark.

The Farley Building fronts on Eighth Avenue and covers the eastern half of the superblock bounded by West 31st Street, West 33rd Street, and Eighth and Ninth Avenues. It sits atop an extensive track and platform system serving Penn Station as well as a former mail train operation that served the General Post Office, but has never provided passenger access. The Farley Building's Eighth Avenue façade (the primary façade) is a portico of 20 columns reached by a wide flight of stairs. The Farley Building is principally comprised of four four-story office blocks around a central skylight-covered atrium originally used as a general postal work floor. Besides space originally built 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 provides mail drops to the platforms of Penn Station below.

The Western Annex was constructed to relieve congestion in the Farley Building, and it expanded the postal facility over the rail yard to Ninth Avenue. Also designed in a neo-classical style similar to that of the Farley Building, the Western Annex is a fully integrated addition to the original structure. Much of the interior space has been used for USPS truck loading and unloading, as well as for administration, carrier operations, and mail sorting. Truck entrances to this space are located on the Ninth Avenue end of the building off a service driveway with exits located on West 33rd Street. Back-in loading docks are located along the West 31st Street frontage near Ninth Avenue.

Although the Western Annex provided a vital upgrade to Postal Service operations at the time it was built, periodic system and facility upgrades have been necessary in the intervening years. Furthermore, USPS eventually expanded and modernized its operations off-site, at the Morgan General Mail Facility and Annex (the Morgan Facility), which is located at West 28th to West 30th Streets and Ninth to Tenth Avenues. Recently, USPS has dedicated considerable resources to creating a modern and efficient operation by consolidating its mail processing, sorting, and distribution operations into the nearby Morgan Facility and vacating considerable space in the Farley Complex, in large part to facilitate the Project.

2.4 PROBLEM IDENTIFICATION AND NEED

Great railway stations play an essential role in defining the communities they serve: as a beacon for way finding; as a portal to and from outlying regions; as a center for intermodal transportation, commerce, culture, and public space; and as a symbol of accomplishment. No other station in North America has more promise in this regard than Penn Station, New York, which lies at the heart of the largest city and the largest regional railway system in the nation, and sees more travelers through its corridors than any other railway station. Penn Station is America's busiest passenger transportation facility, accommodating over 530,000 passenger trips per day, more than Kennedy, LaGuardia, and Newark Liberty Airports combined, and it is a vital part of New York City. However, the current Penn Station, with its crowded spaces and congested operations, cannot realize the promise of a great train station.

The Penn Station Complex is plagued with design problems. It is a three-level, predominantly subterranean maze with an aging infrastructure, few street-level access points, and no visible or identifiable main entrance. The complex has low ceilings and unevenly distributed means of access to and egress from the platforms, with the majority of vertical access points located on the eastern end of the platforms. Penn Station is difficult to navigate and has passenger facilities that do not meet current industry standards related to safe egress times and universal accessibility. The station was built prior to the development of any standards primarily for intercity (rather than commuter) travel and is, therefore, exempt from these standards; however, the Project presents an opportunity to greatly improve this condition. The station, already operating above its design capacity, will experience a growing passenger load as a result of, among other factors, the long-term growth of the Midtown business district and new development expected as a result of the Hudson Yards Rezoning.

Penn Station handles approximately 430,000 Amtrak, LIRR, and NJT passengers per day, in addition to approximately 100,000 daily pedestrian trips by subway users, office building workers, Madison Square Garden patrons, and other pedestrians who are not railroad riders. Amtrak estimates that 30 percent of intercity rail trips in the entire country, and 60 percent of the intercity trips in the Northeast Corridor, originate or terminate at Penn Station, making it the most heavily used passenger facility in the Amtrak system. The Penn Station Complex is also served by direct links to the Seventh Avenue and Eighth Avenue Subways.

Previous renovations to the Penn Station Complex, the future NJT Access to the Region's Core project (ARC), and the LIRR East Side Access Project to Grand Central Terminal will alleviate some of the capacity concerns, but will not fully address the need to serve increasing volumes of patrons. Adding to the capacity concerns, the Penn Station Complex is physically limited by the surrounding bedrock and network of tunnels, making expanding the station expensive and technically difficult.

To address the larger issues of inadequate capacity at Penn Station, ESDC and MSDC have proposed a program of improvements at the Farley Complex that will relocate Amtrak's intercity rail passenger operations to a new rail passenger terminal to be constructed within the eastern portion of the Farley Complex and will significantly improve access to, and egress from, the platforms and the connections between Penn Station, the Farley Complex, and the existing New York City subway lines. The Project, as fully described in Chapter 3, "Project Alternatives," has been designed to help ease rail congestion, redirect pedestrian movements in the vicinity of the Penn Station Complex, and reduce crowding and conflicting movements of intercity and commuter rail users within the terminal and concourses. It will also serve to increase the efficiency of USPS operations by allowing for further consolidation of USPS operations at the Morgan Facility, while still retaining USPS's historic retail presence in the Farley Building.

SUMMARY

The infrastructure of the Penn Station Complex is both aging and inadequate for its current and future ridership. Extensive renovations in Penn Station have helped to alleviate some of these problems, but have not addressed the need to serve increasing volumes of patrons within peak periods. Present physical configurations and volumes of patron movement result in crowded conditions with significant conflicting movement patterns. Full use of the station's platforms is limited by inadequate vertical circulation between the platform level and the waiting areas and concourses above. These circulation constraints limit the number of trains per hour that can use the station. Although the new station contemplated as part of the ARC Project will provide additional tracks and platforms for NJT trains, potentially allowing some platform space to be freed up in Penn Station, this step alone will not resolve the fundamental problems of the limited circulation and growth in ridership. Because expansion of Penn Station's track system is physically limited by the surrounding bedrock and by its connections to tunnels, increased efficiency in the use of platforms is the only cost-effective means for accommodating projected growth. Expected growth in intercity and commuter passengers cannot be adequately accommodated in the existing facilities, and will further compound passenger discomfort, safety and crowding concerns.

2.5 PLANNING CONTEXT

PROJECT HISTORY AND PRIOR STUDIES

Planning for a new intermodal transportation facility began in 1991, when Amtrak initiated efforts to improve its New York City passenger facilities in a *Facility and Needs Assessment Report* that evaluated operations, safety, and accessibility in Penn Station. The report identified a need to better manage the movement of users in the station, and it recommended creating additional retail space to generate income for operational costs. When Amtrak learned that space might be available in the Farley Building, the railroad prepared a feasibility study, which concluded that the renovation of the Farley Building to include new Amtrak facilities and linkages to Penn Station had multiple benefits.

In 1992, Amtrak proposed to convert portions of the Farley Building into the Amtrak passenger terminal with retail space and non-public uses. Two years later, Congress appropriated the first of several federal grants for the further development of plans. The FRA, as the lead federal agency, initiated environmental and historic preservation reviews as mandated by NEPA, Section 106 of the NHPA, and related laws and regulations. In 1995, FRA issued for public

comment a Draft EA analyzing the environmental impacts of the Pennsylvania Station Redevelopment Project.

Further refinement of the project scope and more detailed cost estimates revealed that the project could best be implemented through a funding partnership among the federal, state, and city governments and the integration of a private development component. To lead and coordinate that relationship, ESDC formed a subsidiary, the Pennsylvania Station Redevelopment Corporation (PSRC, now known as MSDC), in 1995. PSRC and Amtrak agreed to work together to improve the Penn Station Complex, and PSRC assumed lead responsibility for redeveloping the Farley Building as an intermodal transportation facility and commercial center and for securing the necessary funding to complete the project. A portion of those funds were to be congressional appropriations to FRA that would be transferred through a series of grant agreements to PSRC. Additional funding was to come from State, City, and private sources.

In 1999, PSRC proposed to enter into a lease agreement with USPS for the eastern portion of the Farley Building for development of a new intermodal transportation facility. Under that proposal, USPS would consolidate its mail handling operations in the Western Annex. Additional elements to the plan in 1999 included a midblock Intermodal Hall and a lower-level commuter concourse. An EA pursuant to NEPA and the State Environmental Quality Review Act (SEQRA) was completed in 1999, and ESDC issued a Negative Declaration under SEQRA with respect to the lease transaction under consideration at that time in March 2000. FRA issued a FONSI under NEPA for the project under consideration in September 1999.

In 2002, ESDC proposed to purchase the Farley Complex from the USPS for the purpose of redeveloping it into a new intermodal transportation facility and commercial center. Under the arrangements contemplated at that time, ESDC would own the Farley Complex, leasing space to USPS, MSDC, and other entities, and USPS would consolidate most of its existing Farley Complex operations at the Morgan Facility. The new retail space was planned to include both destination retail space in the Western Annex and transit-oriented retail space in the Farley Building. In 2003, USPS, ESDC, FRA and other involved and cooperating agencies prepared a Draft Supplemental EA (SEA) for the modified Pennsylvania Station Redevelopment Project. A Final SEA was not issued due to ongoing project refinements.

As a result of such refinements, MSDC and ESDC initiated the Farley/Moynihan Station Redevelopment Project (the Farley/Moynihan Project) in 2004, which would incorporate the station concept analyzed in the Draft SEA, but would expand the potential for private sector involvement in the project. The proposed Farley/Moynihan Project consisted of two phases. Originally estimated to be complete by 2010, Phase I was to include a new Moynihan Station with related retail, space for continued USPS operations, and privately sponsored commercial development within the Western Annex. Phase II was to include a new building constructed by 2010 on a site across Eighth Avenue (the Development Transfer Site) or over the Western Annex by 2015 using approximately 1 million square feet of the Farley Complex's unused development rights.

Based on a pre-qualification review process, ESDC and MSDC issued a Request for Proposals in October 2004. ESDC and MSDC requested that developers submit proposals for the redevelopment of the Farley Complex, which included, among other things, the development of the new Moynihan Station. Developer proposals were submitted on February 18, 2005, and subsequently refined in response to ESDC and MSDC comments during April and May 2005.

In July 2005, ESDC and MSDC conditionally designated a joint venture of the Related Companies and Vornado Realty Trust (the Venture) as the preferred developer of the proposed

Farley/Moynihan Project. The Venture's proposal included Moynihan Station, with a new Train Hall under a skylight, and a sky-lit Intermodal Hall farther to the west. The plan provided approximately 263,000 square feet of space provided for USPS operations, including its Eighth Avenue retail lobby, and a mix of commercial uses—retail uses, a hotel, and a merchandise mart—in the Western Annex. The Venture's plan also proposed to use the development rights associated with the Farley Complex on a lot on the east side of Eighth Avenue between West 33rd and West 34th Streets.

A Draft Environmental Impact Statement (DEIS) was prepared under SEQRA and a Notice of Completion was issued by ESDC on April 27, 2006 and circulated for public review. The DEIS examined a reasonable worst-case development scenario for the Farley Complex and two options for the utilization of the Farley Complex's unused development rights based on the three project alternatives. The public hearing was held on May 31, 2006 at the Farley Building and the public review period extended until June 30, 2006. ESDC completed a Final Environmental Impact Statement (FEIS) under SEQRA and issued a Statement of Findings based upon that FEIS on August 14, 2006. ESDC also affirmed a General Project Plan (GPP) for the project. The FEIS concluded that the project, as then conceived, would not result in any significant unmitigated adverse impacts to the environment.[1] The FEIS provided the information needed for the USPS, FRA, and FHWA to assess the environmental consequences of their actions in compliance with NEPA. The USPS prepared a NEPA EA with FRA as a cooperative agency; USPS subsequently issued a FONSI on December 1, 2006. FRA and other federal transportation agencies did not complete findings on the 2006 Farley/Moynihan Project as the project was not approved by the New York State Public Authorities Control Board and was subjected to further project planning that resulted in an expanded project scope.

PROJECT PLANNING SUBSEQUENT TO THE 2006 FEIS

Based on continued planning, cost analyses, and an opportunity to pursue a more ambitious plan that not only included the proposed Moynihan Station but also comprehensive improvements to the Penn Station Complex, MSDC began preparation of a SEQRA Supplemental Environmental Impact Statement (SEIS) and a NEPA EIS for an expanded project in 2007 (the Expanded Moynihan Project). A public scoping hearing pursuant to both SEQRA and NEPA for the Expanded Moynihan Project was held on December 6, 2007. Opportunities had been identified by ESDC, the Venture, and the New York City Department of City Planning (DCP) to move Madison Square Garden from above Penn Station to the Western Annex and to improve the existing Penn Station in addition to developing Moynihan Station. Updated plans for Moynihan Station as part of the Expanded Moynihan Project included a refined design for the West End Concourse and the West 33rd Street Connector.

The components that were to comprise the Expanded Moynihan Project were: development of Moynihan Station in the Farley Complex; demolition of the existing Madison Square Garden and construction of a new arena within the Western Annex portion of the Farley Complex; reconstruction of Penn Station and new commercial development on the Penn Station Block; new development on the block north of the Penn Station block along West 34th Street between Seventh and Eighth Avenues (the One Penn Plaza block); transportation and commercial development on the block south of Penn Station, which contains the Penn Station Service Building; USPS consolidation in the Morgan Annex; New York City actions to rezone certain

[1] The 2006 FEIS is incorporated by reference and is available at http://www.nylovesbiz.com/pdf/MoynihanStation/FEIS_default.asp.

areas in the vicinity of Penn Station and to create a new zoning subdistrict, tentatively titled the "Moynihan Station Subdistrict"; and extensive pedestrian circulation enhancements and transit access improvements in the immediate area of the Penn Station Complex and the Farley Complex. Taken together, all the project components were expected to add considerable new development to the project area. In addition to the new train stations and a new Madison Square Garden, the combined total development potential expected to be generated by the expanded project was 15.9 million square feet, comprising 8.5 million square feet of office space, 1.6 million square feet of retail, 3.5 million square feet of residential space, and 2.2 million square feet of hotel space.

However, project complexities and changes in the local, state, and federal economies brought the Expanded Moynihan Project to a halt. ESDC, MSDC, PANYNJ, and the City will continue the planning process for future efforts to improve the existing facilities at Penn Station. However, as those efforts go forward, ESDC, MSDC, and PANYNJ are proposing to implement the Preferred Alternative for the Project, which is a project that has its own significant and independent utility.

CURRENT PROJECT PLANNING

ESDC, MSDC, and PANYNJ are now pursuing a capital grant from the USDOT for development of Moynihan Station pursuant to the American Recovery and Reinvestment Act of 2009 (Recovery Act), which was signed into law by President Obama on February 17, 2009. The Project applied for a Transportation Investment Generating Economic Recovery (TIGER) Discretionary Grant from the office of the Transportation Secretary. The current Project, which is substantially the same as the project assessed in the 2006 FEIS, is fully described in Chapter 3 "Project Alternatives."

2.6 FUTURE PROJECT PLANNING

PROJECT PURPOSE, GOALS, AND OBJECTIVES

The Project would address the following specific needs and purposes through a public-private partnership: to create a major transportation hub that improves circulation and capacity of the entire Penn Station Complex, to restore and preserve an important historic resource, and to create a financially viable and dynamic mixed-use development opportunity.

The goals, with associated objectives, for the Project are as follows:

- *GOAL 1:* Create a major transportation hub that improves circulation and relieves capacity constraints in the entire Penn Station Complex.
  - Create a new rail passenger facility in the Farley Building connected to and coordinated with passenger operations throughout the Penn Station Complex;
  - Ease congestion of rail traffic;
  - Redirect pedestrian flow in and around Penn Station to reduce crowding and conflicting movements among intercity and commuter rail users within the passenger terminal and connecting passageways;
  - Improve access to the platforms used by Amtrak, NJT, and LIRR;
  - Provide additional passenger amenities (e.g., commuter concourse, ticketing areas, waiting areas, taxi-drop-offs, shops, and restaurants); and
  - Provide state-of-the-art security, emergency response, and egress measures.

- *GOAL 2:* Restore and preserve an important historic resource.
  - Restore and preserve the exterior of the Farley Complex. Limit exterior changes to those that would not substantially alter the original design concept of the Farley Complex. Retain the historic use of the USPS retail lobby;
  - Create a new train hall filled with light and activity reminiscent of the original Pennsylvania Station;
  - Ensure that the adaptive reuse of the Farley Complex references the original Pennsylvania Station/Farley Building role as transportation resource, civic gateway, and mail facility; and
  - Utilize development rights associated with the Farley Complex off site, and ensure that any development and design would be appropriate to the historic resource;
- *GOAL 3:* Create a dynamic mixed-use development opportunity in the Hudson Yards area and support city and state planning and development policy for West Midtown Manhattan.
  - Permit reuse of available space in the Farley Complex with a mix of uses that are compatible with the transportation center and land use patterns and policies in the surrounding neighborhoods of Hudson Yards, Chelsea, Hell's Kitchen, and West Midtown;
  - Permit development on a nearby site on the east side of Eighth Avenue with a mix of uses that are compatible with Moynihan Station and land use patterns and policies in the surrounding neighborhood; and
  - Support economic development through the creation of jobs and new tax revenues.

STATION CIRCULATION BENEFITS

The Project would have a number of passenger circulation-related benefits for rail passengers and for the railroad operators at Penn Station. These include:

- Passenger access to the Penn Station boarding platforms would be increased by approximately 30 percent as a result of the construction of new escalators, stairways and elevators from the Farley Complex to the western portions of the existing station platforms, as well as the diagonal mail platform (Platform 12);
- Shorter walk distances and reduced travel times, particularly for passengers with origins and destinations in West Midtown Manhattan;
- Shorter platform queues and faster platform clearance following the arrival of heavily-loaded trains during the weekday peak periods;
- Improved passenger safety through new and more evenly distributed egress capacity from the platforms and through new platform ventilation; and
- Improved passenger orientation and wayfinding.

For Amtrak and its passengers, the Project would deliver substantial benefits to the most heavily used and important station in the Amtrak system:

- World-class station improvements for Amtrak, with a strong street-level presence, access to light and air, and a high-quality station environment;
- More efficient boarding of Amtrak trains through greater physical separation of Amtrak passengers from the heavy volumes of rail commuters during the weekday peak periods;
- Expanded public spaces and passenger-handling facilities, enabling future ridership growth;

- Large quantity of public space on multiple levels surrounding the Train Hall, providing supplemental passenger waiting capacity to improve Amtrak's ability to handle holiday peaks and recover from extraordinary delay conditions and incidents;
- Modernized and upgraded support facilities for Amtrak operations;
- Operational efficiencies and cost savings associated with consolidated, state-of-the-art facilities; and
- Within the existing Penn Station, increased space and public circulation areas for commuter rail passengers, opportunities for LIRR and NJT to relocate some of their back-of-house operations, and opportunities for new retail.

ONGOING COORDINATION OF STATION PLANNING AND DESIGN

Concurrent with conducting the NEPA environmental review process, MSDC is continuing to coordinate with the railroads and other stakeholders in the planning and design of the station and key circulation elements. These ongoing design efforts include analyzing station circulation with a longer-term horizon year analysis with an at-capacity station utilization and a larger and long-range estimate in background growth. In addition, MSDC is coordinating with other large-scale transportation projects—most notably NJT's ARC project, as well as the potential to bring Metro-North Hudson Line service to the Penn Station complex—that are expected to be completed after the Project. Coordination with ARC would include coordinating the final design of the Development Transfer Site building with the ARC 34th Street station entrance.

INDIRECT AND CUMULATIVE EFFECTS

These ongoing efforts also reflect the NEPA assessment of indirect and cumulative effects. The federal Council on Environmental Quality's regulations implementing the procedural provisions of NEPA, set forth at 40 CFR Parts 1500-1508, require federal agencies to consider the environmental consequences of their actions, including not only direct effects, but also indirect and cumulative effects.

Indirect effects are those that are "caused by an action and are later in time or farther removed in distance, but are still reasonably foreseeable" (40 CFR 1509.8). Generally, these effects are induced by the proposed project. Cumulative effects result from the incremental consequences of an action (the project) when added to other past and reasonably foreseeable future actions (40 CFR 1508.7). Cumulative effects are the net result of both the proposed project and other improvements planned in, near, and around the project.

The proposed Moynihan Station is responsive to identified transportation demand already existing in the Penn Station area as well as expected future growth in rail ridership that is expected with or without the Project (as well as the additional transportation projects noted above). The completion of Moynihan Station would not preclude additional transportation and circulation improvements at or near Penn Station in the future. In addition, the proposed new facility is well-located to serve new development expected in and around Manhattan's far west side (i.e., the recently approved Hudson Yards development plan) but is not expected to induce new development beyond that already anticipated for the area. The Project's commercial and residential development components have already been identified as part of the area's long-term growth forecast. Therefore, the proposed Project is not expected to result in new indirect impacts.

As set forth in Chapter 3, "Project Alternatives," the analysis of the Project encompasses a "cumulative" approach in that the Project's potential environmental impacts are examined in the context of a future analysis year in which a reasonably conservative and complete estimate of potential future development is accounted for in the impact assessment of the proposed Project. As noted above, there are also potential cumulative effects resulting from ongoing construction activities in the immediate Project area, most notably the ARC project. Chapter 4.12, "Construction" specifically identifies the cumulative construction activities that could reasonably be concurrent with these two projects in the area.

2.7 ENVIRONMENTAL REVIEW PROCESS

In accordance with NEPA, FRA, ESDC, MSDC, and PANYNJ are issuing this EA to analyze the potential environmental impacts from the Project. Subsequent chapters in this EA describe alternatives considered and rejected, the Preferred Alternative (i.e., the Project), the current state of the surrounding environment, and possible effects of the Project. This EA also documents compliance with applicable federal environmental laws, rules, and regulations, including Section 106 of the NHPA, Section 4(f) of the USDOT Act, and Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." ✷