



CITY OF NEW YORK

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December 14, 1007

Rebecca Pellegrini  
Moynihan Station Development Corporation  
633 Third Avenue, 36<sup>th</sup> Floor  
New York, NY 10017

**Re: Expanded Moynihan/Penn Station Redevelopment Project - Comments on the Draft Scope of Work for the Supplemental Environmental Impact Statement**

Dear Ms. Pellegrini:

At its meeting on December 5, 2007 Manhattan Community Board No. 4 approved the following comments on the Expanded Moynihan/Penn Station Redevelopment Project Draft Scope of Work for the Preparation of a Supplemental Environmental Impact Statement (the SEIS).

We note that Eighth Avenue is the boundary between Community Districts 4 (to the west) and 5 (to the east). Our comments are generally limited to the aspects of the project that will have impacts within Community District 4. However, we look forward to coordinating and cooperating with Community Board No. 5 as the project moves forward.

**THE PROJECT**

The Expanded Moynihan Project now includes:

- reconstruction of the existing Penn Station (referred to as Moynihan Station East),
- construction of the previously approved Moynihan Station in the Farley Building on the west side of Eighth Avenue (referred to as Moynihan Station West),
- relocation of Madison Square Garden to the western portion of the Farley Building,
- use by private developers of up to 8 million square feet of existing development rights associated with the Farley Building and the Penn Station/Madison Square Garden site, only 1.1 million of which is proposed to be used onsite as “destination retail” space above Moynihan Station East, with the remainder to be made transferable within a new Moynihan Station Subdistrict,
- relocation of some or all of the remaining USPS operations from the Farley Building primarily to the Morgan Annex at Ninth Avenue and West 29<sup>th</sup> Street,

which could require a one- to two-story addition to the roof of the Morgan Annex;  
and

- zoning map amendments and the creation of a new zoning district or subdistrict.

In short, what was approved in 2006 as a supplemental train station and historic preservation project centered on the landmarked Farley Building has been transformed into the largest comprehensive transportation project in several generations. Community Board 4 supports the vision of transforming the Penn Station/Farley Building complex into a modern efficient transportation hub but remains deeply concerned about many of the project's details. It is the details that we know least about that concern us the most.

## **GENERAL COMMENTS ON THE DRAFT SCOPE OF WORK**

- 1. Flying Blind.** We are puzzled and dismayed that the Draft Scope of Work describes such an extensive development project without providing any site plan or images to explain the shape or location of the various elements of the project. Where are the entrances and exits to Moynihan Station East? To Moynihan Station West? To the proposed new Madison Square Garden? To the destination retail? Where are the loading docks for all of those uses? What changes are required in the Farley Building to accommodate Madison Square Garden? Where are the anticipated receiving sites within the proposed Moynihan Station Subdistrict, and how much floor area could they absorb? The Draft Scope of Work promises that this information will be included in Chapter 1 of the SEIS. However, without some of this information now, it is difficult to provide meaningful substantive comment on the Draft Scope of Work. All we can do is provide general observations on some of the tasks, while anxiously awaiting the public unveiling of this project.
- 2. Hudson Yards and Chelsea Plan Double Dip.** We are extremely concerned at the extent to which the proposed Moynihan Station Subdistrict would revisit the carefully-negotiated 2005 Hudson Yards and 1999 Chelsea rezonings. In particular, in the Hudson Yards rezoning densities in the 34<sup>th</sup> Street Corridor were allowed to increase from a base FAR of 10 to a maximum FAR of 13 through payment to the Hudson Yards District Improvement Fund. This community fought to limit that maximum. Yet that maximum is now proposed to be increased yet again to 15.6 FAR on the south side of 34<sup>th</sup> Street, 24 FAR on the north side of 34<sup>th</sup> Street and 19 FAR at the western corners of 34<sup>th</sup> Street and Ninth Avenue, the Main Street of the lower-density Hell's Kitchen Subdistrict. In the 1999 Chelsea rezoning, the block to the south of the Farley Building was rezoned to provide a transition to lower-density residential districts further south. The Land Use, Zoning and Public Policy Analysis must thoroughly analyze these significant departures from the policies that underlay those recent rezonings.
- 3. Thorough Study.** Overall, the Draft Scope of Work is generally comprehensive and detailed in describing the individual areas for analysis. We are pleased that

ESDC proposes to take such a thorough and conservative approach to the environmental study.

## **SPECIFIC COMMENTS ON THE DRAFT SCOPE OF WORK**

### **Chapter 2: Framework for Analysis – Relationship with Other Project Area Actions (p. 32ff)**

We repeat our concern expressed in our February 2005 comments on the Draft Scope of Work for the FEIS that the **cumulative effects of multiple projects** are not generally adequately considered in the preparation of EISs. Although the Draft Scope of Work says that the listed other projects will be included in the 2011 and 2018 baseline conditions, our experience with the West Chelsea and Hudson Yards studies was that they were not truly cumulative and thus understated the effects of the proposed projects. This must be avoided in the SEIS.

The list of other planned projects should include:

- The United State Postal Service's plan to consolidate mail processing services currently performed at the Bronx General Post Office and at Manhattan's Morgan Processing and Distribution Center. This plan, which is opposed by many in this community, would result in an additional 117 truck trips between the Morgan Processing and Distribution Center and the Bronx every day between 5:00 a.m. and 10:00 a.m. This additional traffic impact must be included in the SEIS.
- Common Ground's proposal to construct supportive housing on the roof of the Morgan Annex. Common Ground has recently discussed its proposal with the Board's Chelsea Preservation and Planning Committee, and we believe that Common Ground is also in discussions with the US Postal Service. The proposal is very preliminary. Informal community reactions at the committee presentation were mixed, and the proposal has not been the subject of any formal action by the Board.
- According to the MTA's requests for proposals for development above the Caemmerer Yards, Western Rail Yards development could occur in a range of scenarios, from 80% residential development and 20% commercial development to the reverse – 20% residential development and 80% commercial development. Development on the Eastern Rail Yards, pursuant to the zoning established in the Hudson Yards rezoning, is expected to be primarily commercial, with residential development concentrated at the southeast corner of the site. As the Draft Scope of Work acknowledges, residential and commercial development have different effects in the various technical areas of the environmental analysis. The SEIS should assume reasonable worst case development scenarios for the Rail Yards in the same way as is proposed for the Expanded Moynihan Project itself.

### **Chapter 3: Land Use, Zoning, and Public Policy**

Study Area Boundary. The Land Use Study Area boundary should be extended north at least to 41st Street to encompass the entire Special Hudson Yards District and the northern expansion of the Javits Convention Center. A more realistic northern boundary would be 42<sup>nd</sup> Street, to include the PABT and the balance of the area rezoned in the Hudson Yards rezoning.

Densities in 2005 Hudson Yards Rezoning. As mentioned above, we are extremely concerned at the extent to which the proposed Moynihan Station Subdistrict would revisit the carefully-negotiated densities in the Hudson Yards rezoning, and look forward to a thorough analysis in the SEIS of the impacts of this significant departure from the policies that underlay the Hudson Yards rezoning.

32<sup>nd</sup> Street Pedestrian Corridor. The Hudson Yards rezoning and the 2006 Farley/Moynihan Project called for a pedestrian corridor along the line of 32<sup>nd</sup> Street, which would be eliminated in the Expanded Moynihan Project. The impact of this change must be analyzed and other possibilities must be explored, such as pedestrianizing 31<sup>st</sup> or 33<sup>rd</sup> Streets or making a connection via the High Line.

*Densities in 1999 Chelsea Rezoning. We are also concerned about the inclusion in the proposed Subdistrict of the portion of the block south of the Farley Building. That block was rezoned in 1999 as part of the implementation of the Chelsea 197-a Plan. The goal of the rezoning in this area was to protect the historic scale and character of 29<sup>th</sup> and 30<sup>th</sup> Streets, including the concentration of SRO's with a long history on 30<sup>th</sup> Street. This area is the sole survivor of the low-scale area, originally middle-class in character but later working-class, into which Pennsylvania Station was inserted. When the southern portion of the block was rezoned to R8B, the northern portion of the block and the Eighth Avenue frontage was rezoned to C6-3X to provide a transition to the lower-density area to the south while allowing development at a high-moderate scale on 31<sup>st</sup> Street and along Eighth Avenue. The SEIS must analyze this proposed departure from the policy that underlay the 1999 rezoning. It must also evaluate the direct visual impact that high-density development on 31<sup>st</sup> Street would have on the Farley Building itself, including the glass roof of the train hall in Moynihan Station West.*

### **Chapter 4: Socioeconomic Conditions**

The Draft Scope of Work mentions at page 37 residential concentrations on West 30<sup>th</sup> and 29<sup>th</sup> Streets between Eighth and Ninth Avenues and on West 30<sup>th</sup> Street between Ninth and Tenth Avenues. The latter is not correct – West 30<sup>th</sup> Street between Ninth and Tenth Avenues has the Morgan Facility on the south side of the street and an entrance to the Lincoln Tunnel on the north. On the other hand, the Draft Scope of Work does not mention that 34<sup>th</sup> Street is also densely residential, particularly between Ninth and Tenth Avenues. Major buildings that should not be overlooked include: The Webster Apartments (413 W. 34<sup>th</sup> Street) containing 390 residential units; the former Y (354 W. 34<sup>th</sup> St.) containing 254 residential units; the “B&H” building (420 Ninth Avenue)

containing 19 residential units; and 408 W. 34<sup>th</sup> Street containing 68 residential units. In addition, the Fashion Institute of Technology dormitory at 406 West 31<sup>st</sup> Street houses 1100 students.

The assessment for direct and indirect business displacement must include a careful study of garment industry uses and Class B office space, pressure on which will be further increased by the creation of the Special Moynihan Subdistrict. It should also study the businesses in the area likely to be affected by the relocation of USPS operations.

## **Chapter 5: Community Facilities and Services**

Contrary to the statement on page 37, the Hudson Yards project does not include the construction of a new firehouse. This facility should not be assumed in the SEIS.

The U.S. General Post Office is the main retail post office for the Borough of Manhattan. The assessment of the potential for adverse impacts on postal service should be extended beyond the local community and include the entire Borough, especially on April 15 each year when last-minute tax filers depend on the facility's 24-hour service.

## **Chapter 6: Open Space**

The open study areas should extend from the proposed boundaries of the Moynihan Station Subdistrict, since the transferred development rights could result in concentrations of new office workers and residents throughout the subdistrict. In addition, the study area for commercial projects should include areas with ¼ mile of the Morgan Annex, since the project would transfer a substantial number of workers to that location.

*The Draft Scope of Work states on page 39 that the area directly affected by the proposal is already deficient in open space. This is a considerable understatement. The provision of new open space in the area must be seriously studied.*

## **Chapter 8: Historic Resources**

### A. The Farley Building

The original concept of the 2006 Farley/Moynihan Project and an essential part of the Expanded Moynihan Project is the creation within the historic Farley Building of a railroad station recalling Pennsylvania Station and truly worthy of this original. This action was analyzed in the FEIS, so our comments here are centered on issues raised by the relocation of Madison Square Garden to the western part of the building. Some aspects of the proposal for the Garden appear to threaten the character of the Farley Building, and ways should be found to minimize their impact on the appearance and character of the building. Careful evaluation of adverse impacts and of ways to minimize them is necessary. In the absence of any *images* of the proposed insertion of the Garden

into the Farley Building, *our* discussion must be limited to listing the major proposed and suggested changes to the historic building and the consequent impacts to be evaluated:

- 1) Will the enclosure of the new Garden rise above the walls of the Farley Building to a visually disturbing height inconsistent with the historic character of the building? Evaluate the impact of the visibility of the new Garden as seen from points outside the structure.
- 2) What changes are proposed to the exterior of the *existing structure*? Evaluate the impacts on its integrity.
- 3) There are much altered loading docks on 31<sup>st</sup> Street. Will they be used? How much can they be made consistent with the original design? If they are not used, what will replace them? Proposals should be evaluated against the original design.
- 4) The intermodal hall proposed in the *2006 Farley/Moynihan Project* will not be built. How far east will the footprint of the Garden extend? Will the western wall of the courtyard holding *the train hall* be compromised or demolished? Any such action must be evaluated for impacts on this historic space.
- 5) How is the integrity of the train hall to be preserved? The interior walls of the court in which it is to be located show a true architectural treatment by the original architects. Evaluate the impacts of signage and other changes on the historic character of the space.
- 6) Will the integrity of the *USPS retail lobby* be preserved? It would appear to be too small and narrow to accommodate Garden crowds, let alone to allow sharing usage with the *USPS*. Its usage is heavy at many times, such as late afternoon, Christmas, and income tax days. The existing Garden lobby has approximately the same breadth and number of windows as the Post Office lobby, but *the Post Office lobby* is much shallower and must be approached by the historic steps that were not designed to accommodate the size and character of the crowds that surge into the Garden.
- 7) It is hard to see how the crowds that visit the Garden can pass *from the lobby to the Garden* by passageways from this lobby. Can the existing entrances to the addition on 33<sup>rd</sup> Street and on Ninth Avenue be used to reduce impacts on historic features like the steps and lobby and handle these crowds? Would enlarging the entrance on 31<sup>st</sup> Street be useful and feasible? Evaluate these options.
- 8) *The symbolic Eighth Avenue* façade with its inscription remains one of the few surviving elements of the area that recall the historic Pennsylvania Station. Can it remain intact? Are entrances so designed that they are adequate for the crowds entering or *leaving the building*? Can the steps remain a real open space? How will adequate disabled access be provided to the *USPS retail lobby* and the Garden? Evaluate the designs for these issues.
- 9) *Signage for the Garden on the building's façade* would strongly diminish its character. Can options like small kiosks at the corners of the steps be made an acceptable solution?
- 10) The symbolic and practical impacts of removing retail postal use from the Farley Building or limiting it to a nominal presence must be evaluated. Among these impacts might well be the loss of the elaborate Postal Service offices above the lobby. Can this resource be preserved and perhaps opened to the public for tours in

non-business hours? In the conversion of the Customs House for the Museum of the American Indian the magnificent offices of the Collector of Customs were restored and opened to the public.

*Finally, the Board strongly believes that all proposals for changes to this important New York City landmark must be subject to review by the New York City Landmarks Preservation Commission. It was the loss of the original Pennsylvania Station that triggered the formation of the Commission, and it is essential that the Commission have an opportunity to consider the redemption promised by the Expanded Moynihan Project.*

#### B. Other Historic Buildings

The creation of Pennsylvania Station in 1910 and the improvements in transportation that followed it brought about the construction of a large number of buildings in the surrounding area, most of which have survived. These must be evaluated for their individual quality and historic importance. The symbolic importance of Pennsylvania Station requires especially careful review of the area around the station and the Farley Building to ensure that significant buildings reflecting the environment they created is not lost, taking with them the last pointers to the historic character they created.

Of special importance is the Service Building, located on 31<sup>st</sup> Street and clearly visible from within Community District 4, as the sole survivor of the original station. It has already lost the chimney stacks that identified it as the station power plant. Alterations to give it new uses supportive of the station must be evaluated so as not to further diminish its historic character. We believe that requesting review for designation as a New York City Landmark, for which it has been judged eligible, is required to ensure adequate review of changes.

The EIS's undertaken for the Hudson Yards and West Chelsea rezonings show a large number of historic resources within and close to the proposed Moynihan Subdistrict. *The resources identified in those reviews must be included in the current review. Because of the indirect impacts from the cumulative increases in maximum bulk from those rezonings, full evaluation both of the physical surroundings of those resources and of the pressures for their inappropriate enlargement or demolition require a full new review. Because of the likelihood of extended secondary impacts, the area of potential effect must be enlarged to include at a minimum one full block beyond the boundaries of the proposed Moynihan Subdistrict. Previous studies of portions of the area have been done by the Landmarks Preservation Commission and by Andrew Dolkart and various planning studios at the Columbia School of Architecture, Planning, and Historic Preservation. These sources must all be consulted in preparing the SEIS.*

Besides the historic buildings identified in previous reviews, the following individual buildings should also be evaluated for eligibility both for designation by the New York City Landmarks Preservation Commission and listing on the State/National Historic Register.

- 1) The handsome 1917 building at 461 Eighth Avenue on the west blockfront of Eighth Avenue between 33<sup>rd</sup> and 34<sup>th</sup> Streets, also known as 5 Penn Plaza.
- 2) The building at the northwest corner of 29<sup>th</sup> Street and Eighth Avenue, originally called Lamartine Hall. This is a rare survivor of a once common building type, usually three or four stories high, with a store at ground level, an assembly hall on the second floor, typically marked by long windows, and apartments above. The hall itself was the starting point for the Orangemen's march that ended in the 1874 Orange Riots a few blocks south on Eighth Avenue. More recently as the "Egyptian Gardens" it was the last survivor of the Greek dancing places that were long part of the Greek American community and that had a brief vogue in Mayor Lindsay's administration. It is the only remaining identifiable building that housed such a use.
- 3) The adjacent building at 303 W. 29<sup>th</sup> Street, which was the first location of the Hebrew Orphan Asylum and played a role in other events on the Street.
- 4) The building at 339 West 29<sup>th</sup> Street that is, so far as known, the only documented Underground Railroad site in the city.
- 5) 339 West 29<sup>th</sup> is a member of a group of row houses of mostly similar scale and character extending immediately to the west from the former French Hospital, now the French Apartments, a previously identified historic resource extending through the block from 330 West 30<sup>th</sup> Street. The numbers on West 29<sup>th</sup> Street are 337 to 359, which back onto largely intact row houses between 354 and 366 West 30<sup>th</sup> Street.

### C. Potential Historic Districts

The 34<sup>th</sup> Street corridor west of Eighth Avenue features a cluster of commercial or institutional buildings of moderate or high-moderate scale, all but one dating from the period after the creation of Pennsylvania Station, that together create a definite sense of place.

They are:

- New Yorker Hotel. 481-497 Eighth Ave, a prominent Art Deco Hotel serving passengers from Penn Station
- Former Manhattan Opera House, 311 West 34<sup>th</sup> Street, later the Scottish Rite Masonic Building, now the Manhattan Center.
- Former J. C. Penney Building, 330 West 34<sup>th</sup> Street, now offices.
- Former William Sloan Memorial YMCA, 360 West 34<sup>th</sup> Street, now apartments.
- Across the street from the latter is the West Side Jewish Center, 347 West 34<sup>th</sup> Street.
- At 325-329 West 33<sup>rd</sup> Street, adjoining the rear of the Penney Building, the Glad Tidings Tabernacle, a striking early Romanesque Revival former Presbyterian church that formed part of the row house/low tenement environment in which Pennsylvania Station was built.
- St Michael's Roman Catholic Church Complex, 314-424 West 34<sup>th</sup> Street, partially within the Subdistrict, but mostly outside it to the west .



- Webster Apartments, 419 West 34<sup>th</sup> Street, directly adjoining the Subdistrict on the west.
- Harding Building, 440-448 Ninth Avenue, on the northwest corner of the block containing the contiguous group, but separated by parking lots.

This group of historic resources, as well as the group of row houses on West 29<sup>th</sup> and 30<sup>th</sup> Streets described above, should be studied as potential New York City Historic Districts and also State/National Historic Register Districts. Such study, along with individual resources previously identified or identified as a result of this review, should be listed as possible mitigation measures for probable loss of historic resources.

## **Chapter 10: Neighborhood Character**

*The Expanded Moynihan Project will have a major impact on neighborhood character throughout the proposed Subdistrict, but the lack of information in the Draft Scope of Work makes it difficult to comment in detail.*

*The original Pennsylvania Station was erected in a low-density working-class neighborhood, visible in photographs of the station's construction. The character of the area immediately around Penn Station was established by such consequences of the station as hotels: the Hotel Pennsylvania, the former Hotel Governor Clinton on Seventh Avenue at 31<sup>st</sup> Street, and the Hotel New Yorker on Eighth Avenue and 34<sup>th</sup> Street.*

*Within Community District 4 there are two areas with consistent and well-defined character within the area affected by the Expanded Proposal that have been mentioned in earlier chapters:*

- *The blocks of 34<sup>th</sup> Street stretching west from Eighth Avenue to near Tenth Avenue, which owe their particular character to the moderate-scale residential buildings referred to in Chapters 3 and 4 and to the historic buildings discussed in Chapter 8. There is considerable overlap in the two groups.*
- *The low residential blocks directly south of the Farley Building, discussed in Chapters 3 and 4.*

*Analysis must include the impacts of anticipated new development on the scale and character of these areas.*

## **Chapter 12: Infrastructure – Stormwater, p. 49-50**

This section deals with additions to existing and NYCDEP allowable stormwater flows into the combined sewer system and then into the Hudson River. Stormwater flows are proposed to be based on flow rate calculations based on the “NYCDEP standard rain storm.” However, climate changes are affecting projections for rainfall and sea levels, and the City’s hurricane evacuation zones extend inland from the Hudson River as far as 31<sup>st</sup> Street and Ninth Avenue. We are concerned that the “NYCDEP standard rain storm” may no longer be the relevant standard for evaluating the potential impact of development on stormwater flows.

## **Chapter 14: Energy**

The Hudson Yards FGEIS forecast the need for additional energy supply, yet to our knowledge no planning is underway to fulfill that need. The SEIS should not assume that the additional supply forecast in the Hudson Yards FGEIS will be provided.

Moreover, it is likely that the Expanded Moynihan Project, along with the other projects cited in Chapter 2, will have significant adverse impacts on energy supply, especially considering the difficulties ConEd has been encountering over the past year. This is an area of particular concern as to the adequacy of the cumulative analysis.

Task C – describing and summarizing the energy saving contributions of implementing LEED certification requirements – should use the highest available level of LEED certification requirements so that the energy saving contributions are maximized.

## **Chapter 15: Traffic and Parking**

TRAFFIC!!! Is the area of greatest concern for this Board. The SEIS will produce technocratic and apparently ineffective solutions like signal timing changes, while CD4 residents and workers live the nightmare that is the traffic congestion created by having the Lincoln Tunnel in their midst. For that reason, we enthusiastically support rebuilding Penn Station so more people get out of their cars and onto the rails, while we remain wary about the increased congestion that will be created by 8 million square feet of new development.

As noted at the beginning of this letter, it is impossible to provide constructive comment on the proposed traffic analysis without knowing exactly where the traffic will be. We do note, however, that the proposed traffic analysis is hugely expanded from the FEIS, which is all to the good.

The relocation of Madison Square Garden will have several consequences for the area that were not called out in the Draft Scope of Work and will need special study. Taxis and limousines will now be traveling farther west to the new facility, and these impacts will be increased to some degree by the presence of Moynihan Station West nearby. 31<sup>st</sup> and 33<sup>rd</sup> Streets are already heavily trafficked in the area. Experience shows that such vehicles are likely to try to stand for a considerable time in the nearby streets to pick up their passengers. The crowds waiting, entering, and leaving the new facility are likely to create further congestion and delay. These impacts must be analyzed realistically and in detail. The periods of analysis must take the timing and character of events at the Garden into account.

We offer a handful of detailed comments:

P51a (Figure 7 – Traffic Study Area and Turning Movement Count Locations)

P52a (Figure 8 – Traffic Study Area and ATR Locations)

One of the likely outcomes of increased USPS operations at the Morgan Facility would be increased congestion on 29<sup>th</sup> Street between Ninth and Tenth Avenues, between the two Morgan facilities. This is a primary west-bound artery for traffic heading for the West Side Highway or the Lincoln Tunnel entrances off Tenth Avenue. If 29<sup>th</sup> Street is backed up, traffic on Ninth Avenue will divert to 23<sup>rd</sup> Street, but will also attempt to turn right on 25<sup>th</sup> St., the first open west-bound street south of 29<sup>th</sup>. We request the inclusion of 25<sup>th</sup> and Ninth and 25<sup>th</sup> and Tenth in the intersections being analyzed.

For the same reason 25<sup>th</sup> St. between Ninth and Tenth Avenues should be an ATR Regular Count Location, just as is 29<sup>th</sup>.

Finally, the traffic analysis must also include truck trip generation for the project. Particular areas of sensitivity include Madison Square Garden, for which actual truck data from current operations should be used, the 1.1 million square feet of destination retail, for which the proposed Time Warner Center analysis is indeed appropriate, and the USPS Morgan Facility, which must include an analysis of the proposed consolidation of operations in the Bronx, as noted above in our comments on Chapter 2.

## **Chapter 16: Transit and Pedestrians**

### Transit - P57a (Figure 9 – Transit Study Area)

We ask that the effects of a delayed or cancelled No. 7 subway line also be studied.

### **Pedestrians**

The generally excellent detailed analysis of pedestrian traffic in the Draft Scope of Work does not take into account the **crowds attending events at the relocated Madison Square Garden**, which will be using the nearby sidewalks not only for movement to and from the facility, but for standing, waiting, and what may politely be called schmoozing of many kinds.

It is difficult to comment effectively in the absence of any real indication of where the entrances to the new Garden will be and where new reservoir space will be located. The location of entrances to the Garden must be carefully studied to minimize impacts on streets, sidewalks, and the historic character of the Farley Building. The historic open steps and the USPS retail lobby (even if available) will clearly not be sufficient. Can the historic entrances to the Farley addition on 33<sup>rd</sup> Street (and perhaps an expansion of the smaller one on 31<sup>st</sup> Street) be used as entrances with real reservoir space in the structure? Separation of this traffic from normal pedestrian traffic and pedestrian traffic to the station is clearly necessary.

We are already concerned about the increased pedestrian traffic that will be created by New Jersey Transit's **Access to the Region's Core** project. The cumulative pedestrian impacts of ARC and the Expanded Moynihan Project must receive careful attention.

P58a (Figure 10 – Pedestrian Study Area) - The **corner of Ninth Avenue and 30<sup>th</sup> Street** should be included in the pedestrian facilities to be analyzed. 30<sup>th</sup> St. is a major east-bound artery, with significant traffic both from the West Side Highway and from the Lincoln Tunnel. In addition to the heavy pedestrian usage of this corner by USPS employees from Morgan, 1,100 FIT students now live in a dorm one block to the north and west, at 406 W. 31<sup>st</sup> St.; we have long been concerned about pedestrian safety at this intersection.

## **Chapter 22: Alternatives**

Consistent with our comments concerning Chapter 3 above, we request that the reduced density alternative include an alternate Moynihan Station Subdistrict boundary that does not extend west of Eighth Avenue.

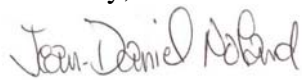
## **Chapter 23: Mitigation**

Historic Resources. The EIS's for the Hudson Yards and West Chelsea rezonings listed a large number of historic resources as endangered and flatly stated that their probable loss was essentially unmitigatable. The Board believes this situation is unacceptable and must not be repeated in this action. Mitigation should include a commitment by the Landmarks Preservation Commission to study and make a report on designations in the area. A supplementary approach would be to prepare nominations of appropriate resources to the State/National Historic Registers to enable tax advantages.

Open Space and the Garment Center. As noted above, the Expanded Moynihan Project is also likely to have significant impacts on open space and on economic vitality in the Garment Center. Mitigations in each of these areas must be considered.

Thank you for considering these comments.

Sincerely,



Jean-Daniel Noland  
Chair



Anna Hayes Levin, Chair  
Clinton/Hell's Kitchen Land Use



J. Lee Compton, Co- Chair  
Chelsea Preservation and Planning

[signed 12/14/07]

Lynn Kotler, Co-Chair  
Chelsea Preservation and Planning