



U.S. Department
of Transportation

1200 New Jersey Avenue, SE
Washington, DC 20590

Federal Railroad
Administration

July 30, 2026

R. Daniel Mackay
Deputy Commissioner
New York State Office of Historic Preservation
Division for Historic Preservation
Peebles Island Resource Center
P.O. Box 189
Waterford, NY 12188-0189

RE: Penn Station Transformation Project
Manhattan, New York County, New York
Initiation of Section 106 Consultation and Finding of Adverse Effect

Dear Mr. Mackay:

The Federal Railroad Administration (FRA) is providing financial assistance to the National Railroad Passenger Corporation (Amtrak) for the proposed Penn Station Transformation Project (the Project). The Project is located at New York Penn Station (Penn Station or the Station), in Midtown Manhattan (see **Attachment 1, Figure 1-1**). The Project is an undertaking subject to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations at 36 CFR Part 800 (Section 106). The purpose of this letter is to initiate Section 106 consultation, define the area of potential effects (APE), identify historic properties, assess effects, document findings of effects, and provide an opportunity to comment.

Project Background

Amtrak proposes to redevelop and improve Penn Station to transform the Station into a modern, iconic transportation hub, while enhancing safety, functionality, and overall customer experience. The purpose of the Project is to provide safer and more efficient operations, improve passenger circulation, enable accessibility including compliance with the Americans with Disabilities Act (ADA), accommodate increased train and passenger circulation capacity, and deliver a world-class experience for users. Penn Station is crowded, confusing to navigate, and outdated. Passenger circulation at all levels of the Station is inadequate to meet current and anticipated future demand. In addition, many of the Station's structural components, operating systems, and back-of-house spaces are out of date and inefficient, and, in some cases, do not meet current safety standards. The Station also lacks the architectural distinction suitable for a major gateway to New York City that is also North America's busiest transportation center. Wide-scale improvements to address these substandard conditions are critical to make Penn Station a well-functioning and world-class transportation hub.

Project Description

Following a competitive procurement process, Amtrak selected Penn Transformation Partners as the Master Developer to support financing, design, and construction for the Project. The Project will remove the existing InfoSys Theater at Madison Square Garden (MSG) to create new space for a train hall facing Eighth Avenue,, bringing additional daylight into the Station and improving

the Station's street presence and integration with the public realm. The new train hall and entrance will connect to a new passenger concourse that includes a boarding area with customer services. In addition, the Project will redevelop the sidewalk area surrounding MSG with an approximately 90-foot-tall rectangular structure, extending partially up the existing MSG façade. This new structure will contain a mix of back-of-house functions, building utilities, and commercial space. The upper half of the circular MSG arena exterior will remain visible and will be reclad to complement the design of the new Station façade.

At street level, the Project will modernize existing Station entrances and add new, strategically located access points. Accessibility will be further enhanced through expanded sidewalks and dedicated passenger pick-up and drop-off areas.

The Project will expand and reconfigure the existing MSG and Amtrak loading dock space within the base of MSG arena. This expansion will be accomplished by removing equipment and infrastructure associated with the InfoSys Theater and repurposing the existing Amtrak rotunda space in the Station to create additional loading dock area that can fully accommodate the Station's loading operation.

The Project also includes the rehabilitation of the Penn Station Service Building, located at 236-248 West 31st Street (Manhattan Block 780, Lot 60), at the south side of the Station. The Project will retain the Service Building's exterior and reconfigure the interior to house station equipment, back-of-house and operational functions, and office space. This will include the addition of new floors within the building.

At the track and platform level, the Project will improve platform capacity by removing existing columns and other platform elements that impede passenger flow. The Project will make other modifications to improve conditions for passengers, including reconfiguring existing vertical circulation elements (VCEs; i.e., staircases, escalators, and elevators), adding new VCEs to connect rehabilitated platforms to the new train hall above, and improving signage and lighting. The Project may also include new VCEs connecting to the West End Concourse and Moynihan Train Hall. The specific number and locations of new and reconfigured VCEs will be determined during final design in coordination with the Master Developer and Amtrak. The Project may also include other modifications to platforms, such as platform extensions to accommodate longer trains, along with new VCEs providing access to those extensions. Specific platform modifications will be determined during final design and in coordination with Amtrak and the Master Developer. Other work at the track level may be necessary as Project design and engineering progress.

Construction of the Project is anticipated to start in 2027 and take approximately seven years. During that period, construction activities will occur in the Station and Service Building and on the sidewalk around MSG. Construction activities will also affect sidewalks and parking lanes on the four streets surrounding the Penn Station block.

Attachment 2 provides preliminary illustrative plans and diagrams for the Project. Please note that design is in progress; therefore, these materials will likely be revised during conceptual engineering. In addition, no illustrative renderings are currently available for proposed modifications to the Penn Station Service Building or to the track-level infrastructure in the Station.

Area of Potential Effects

The APE as defined in 36 CFR § 800.16(d) is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” FRA delineated the APE for the Project to reflect the nature, scale, and location of the Project (see **Attachment 1, Figure 1-2**) and considered direct effects and indirect effects. Physical effects are limited to the Limits of Disturbance (LOD), which includes all areas where construction activities are proposed to occur as well as areas used to support construction such as temporary access routes and equipment staging areas.

The APE extends beyond the LOD to account for potential visual effects and other effects, such as construction-related vibration, associated with potential above-grade Project elements. In considering the potential effects of the proposed above-grade Project elements, the APE accounts for the Project’s location in Midtown Manhattan where the dense urban development generally precludes views beyond the immediate blocks surrounding the LOD. The APE is roughly bounded by Sixth Avenue/Avenue of the Americas to the east, West 30th and West 31st Streets to the south, Tenth Avenue to the west, and West 33rd and West 34th Streets to the north. While the APE extends from Sixth to Tenth Avenues, above-ground Project elements would be between Seventh and Eighth Avenues. In areas where the LOD encompasses only below-grade Project elements, with no above-grade elements proposed, the APE does not extend beyond the LOD, since there would be no potential effects associated with the below-grade Project elements beyond the limits of the LOD.

Identification of Historic Properties

To identify historic properties in the APE, Amtrak’s consultants, who meet the Secretary of the Interior’s (SOI) Professional Qualifications Standards, prepared the enclosed surveys and reviewed available information from Federal, state, and local sources.

Architectural Properties

In July 2025, Amtrak submitted a report, “National Register Evaluation of Pennsylvania Plaza,” to the New York State Historic Preservation Office (SHPO). That report, available through the SHPO’s Cultural Resource Information System (CRIS), assessed the historic and architectural significance of the complex of three buildings that in 1963-1968 replaced the original Pennsylvania Station built in 1910.¹ Those three buildings—the Two Penn Plaza office building, MSG, and the below-grade New York Penn Station—were planned, designed, and constructed as a unified development project and occupy the block bounded by Seventh and Eighth Avenues and West 31st and West 33rd Streets in Manhattan, New York City, and they are collectively referred as the Pennsylvania Plaza (Penn Plaza) development. The evaluation considered both Penn Plaza as a whole and the three buildings individually, because while they are group of interrelated buildings, Penn Station, Two Penn Plaza, and MSG are each a self-contained and functionally independent facility.

The report did not recommend Penn Plaza complex or any one of its constituent properties as eligible for the NRHP. Based on the report, the SHPO determined in August 2025 that Penn Plaza as a whole, Penn Station, and Two Penn Plaza are not eligible for the NRHP. The SHPO disagreed with the conclusions of the report related to MSG and found that the arena is individually eligible for the NRHP under Criterion A in the area of entertainment and recreation and Criterion C in the area of engineering (USN 06101.020919). Based on the report and findings

¹ <https://cris.parks.ny.gov/>. The “National Register Evaluation of Pennsylvania Plaza” report is linked to the Penn Station New York entry, Unique Site Number (USN) 06101.019041.

of the SHPO, FRA determines that Penn Plaza, Two Penn Plaza, and Penn Station are not eligible for the NRHP. FRA concurs with SHPO that MSG is eligible for the NRHP.

A records search identified 13 historic architectural properties within the APE that were previously listed in, or determined eligible for the NRHP. The enclosed report in **Attachment 3** (“Identification of Historic Properties in the Area of Potential Effects”) includes the results of the records search and new architectural surveys for the Project. Based on the results of the report, FRA did not identify any additional historic architectural properties within the APE.

Archaeological Properties

Attachment 4 includes an Archaeological Disturbance Memorandum that assessed the archaeological sensitivity of the LOD portion of the APE. The memorandum concluded that the entirety of the LOD is sufficiently disturbed such that there is no possibility for archaeological sites to be present within its limits. Based on the results of this memo, FRA recommends no further archaeological analysis is required for this Project.

Historic Properties in the APE

Based on the results of these studies, FRA identifies the following historic properties within the APE for the Penn Station Transformation Project:

Historic Properties in the APE			
Property Name	Address	Parcel ID (Block/Lot)	Historic Status
Lithuanian Alliance of America	307 West 30th Street	754 / 34	NRHP Listed
U.S. General Post Office / James A. Farley Building (Moynihan Train Hall)	441 Eighth Avenue	755 / 7501	NRHP Listed
Fairmount Building	239 West 30th Street	780 / 17	NRHP Eligible
St. John the Baptist RC Church Complex	209 West 30th Street	780 / 26	NRHP Eligible
Penn Terminal Building (7 Penn Plaza)	370 Seventh Avenue	780 / 36	NRHP Eligible
Penn Station Service Building ¹	232 West 31st Street	780 / 60	NRHP Eligible
Madison Square Garden	4 Penn Plaza	781 / 1	NRHP Eligible
Stewart Hotel	371 Seventh Avenue	806 / 76	NRHP Eligible
Former Equitable Life Assurance Company	393 Seventh Avenue	807 / 1	NRHP Eligible
St. Francis RC Church Complex	137 West 31st Street	807 / 18	NRHP Eligible
34th Street/Penn Station Subway Station (7th Ave/Broadway Line)	433 Seventh Avenue	809 / 80	NRHP Eligible
New York Improvement & Tunnel Extension of the Pennsylvania Railroad (<i>Penn Station Service Building is a contributing element</i>)	Between Weehawken, NJ and Long Island City, Queens, NY including beneath Penn Station	N/A	NRHP Eligible
FDNY Hook & Ladder 24, Engine Co. 1	142 West 31st Street	806 / 66	NRHP Eligible

Finding of Effect

FRA applied the criteria of adverse effect pursuant to 36 CFR § 800.5 and finds that the undertaking will have an **adverse effect to the Penn Station Service Building and New York**

Improvement & Tunnel Extension of the Pennsylvania Railroad. Pursuant to 36 CFR § 800.6, FRA will consult with you and other consulting parties to develop and evaluate strategies to avoid, minimize, or mitigate the adverse effects on these historic properties. FRA will also notify the Advisory Council on Historic Preservation of the adverse effect determination.

FRA finds there will be no effect or no adverse effect to the other historic properties within the APE. The Project will not physically alter these properties, introduce visual, atmospheric or audible elements that diminish the integrity of the properties' significant historic features. The Project will not otherwise affect the seven aspects of integrity of these historic properties: location, setting, design, materials, workmanship, feeling and association nor diminish the qualities that make them eligible for inclusion in the NRHP. Specifically:

- Any changes within the U.S. General Post Office / James A. Farley Building (Moynihan Train Hall), such as potential additional VCEs, will be consistent with recent interior renovations to the building and will not adversely affect the exterior. In addition, the proposed exterior alterations to MSG, which post-dates the construction of the U.S. General Post Office / James A. Farley Building (Moynihan Train Hall), including the proposed rectangular Station structure and recladding of the visible exterior circular portion above the rectangular Station structure, will not adversely affect the setting of the U.S. General Post Office / James A. Farley Building (Moynihan Train Hall).
- Proposed changes to MSG will not adversely affect the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish its integrity. As set forth in SHPO's August 2025 NRHP eligibility determination for MSG, MSG is eligible for the NRHP under Criterion C in the area of engineering for its innovative steel cable suspension roof system, with the roof and its bowl-shaped arena directly contributing to its significance. MSG is also eligible under Criterion A in the area of entertainment and recreation as an arena with significance related to the field of boxing and for hosting the 1971 Concert for Bangladesh, a benefit concert which set the precedent for subsequent humanitarian aid concerts.

The roof and bowl-shaped arena of MSG will remain. The circular shape of the arena, which will be reclad, will remain significantly visible above the proposed rectangular station structure from the exterior. The shape of the arena will not be altered on the interior. The InfoSys Theater, proposed for demolition as part of the Project, is a smaller theater space at MSG that has been altered, including with a rectangular extension along Eighth Avenue and a full interior redesign that switched the locations of the main entrance and stage. The InfoSys Theater does not contribute to MSG's historic significance and lacks integrity.

- There will be no adverse effect to the Penn Terminal Building. This property is across West 31st Street from the existing NJ TRANSIT Station entrance at the northwest corner of Seventh Avenue and West 31st Street, where the Project would include modifications. These exterior changes to an existing modern station entrance will not adversely affect the setting of this historic property.
- There will be no adverse effect to the Stewart Hotel. This property is across Seventh Avenue from the existing NJ TRANSIT Station entrance at the northwest corner of Seventh Avenue and West 31st Street, where the Project would include modifications. These exterior changes to an existing modern station entrance will not adversely affect the setting of this historic property.

- There will be no adverse effect to the former Equitable Life Assurance Company building. This property is across Seventh Avenue from the existing NJ TRANSIT Station entrance at the northwest corner of Seventh Avenue and West 31st Street, where the Project would include modifications. These exterior changes to an existing modern station entrance will not adversely affect the setting of this historic property.
- There will be no effect to the Lithuanian Alliance of America. This property is on the north side of West 30th Street, west of Eighth Avenue, and there is no visual relationship between this property and the location of the proposed above-grade Project elements.
- There will be no effect to the Fairmont Building. While this property abuts the south side of the Penn Station Service Building where interior reconfiguration will occur, the Fairmont Building faces south onto West 30th Street and any interior changes to the Penn Station Service Building will not affect the setting of the Fairmont Building.
- There will no effect to the St. John the Baptist RC Complex. This property is on the north side of West 30th Street, west of Seventh Avenue, and there is no visual relationship between this property and the location of the proposed above-grade Project elements.
- There will be no effect to the St. Francis RC Church complex. This property is on the north side of West 31st Street, east of Seventh Avenue, and there is only a limited visual relationship between proposed above-grade Project elements and this historic property due to intervening buildings and Seventh Avenue.
- There will be no effect to the 34th Street/Penn Station Subway Station at Seventh Avenue and West 34th Street. This historic property is below-grade, and there is no visual relationship between it and the proposed above-grade Project elements. In addition, the below-grade project elements will not directly affect this subway station.
- There will be no effect to FDNY Hook & Ladder 24, Engine Co. 1. This property is on the south side of West 31st Street, east of Seventh Avenue, and there is only a limited visual relationship between the proposed above-grade Project elements and this historic property due to intervening buildings and Seventh Avenue.

While Project construction activities would result in noise in and around Penn Station, construction activities would be subject to the New York City Noise Code. Given the existing setting of Midtown Manhattan, where ambient noise levels are high, and the protocols required by the New York City Noise Code, construction-related noise will not adversely affect the setting of any of the historic properties in the APE. In addition, the Project will include construction protection measures to be implemented for historic properties to avoid potential accidental damage to historic properties during construction.

Consulting Party Outreach

FRA identified parties that may be interested in the Project's effects on historic properties. FRA invites those copied on this letter to participate as Section 106 consulting parties. Invited parties should indicate their willingness to participate as a consulting party and provide comments, as indicated below, within 30 calendar days from the date on this letter. For more information on the role of a consulting party, see: <https://www.achp.gov/citizens-guide-section-106-review>.

FRA invited Federally recognized Indian tribes (**Attachment 5**) to participate in consultation by separate correspondence.

Draft Memorandum of Agreement

FRA prepared a draft Memorandum of Agreement (MOA) for comment pursuant to 36 CFR § 800.6 to resolve adverse effects to historic properties (**Attachment 6**). Further, FRA proposes the following treatment measures to mitigate adverse effects to Penn Station Service Building and New York Improvement & Tunnel Extension of the Pennsylvania Railroad, and welcomes feedback or suggestions of other mitigation measures that could be included in the MOA: vibration monitoring, architectural salvage plan, public display on the history of Penn Station redevelopment, and documenting the current condition the Penn Service Building.

Request for Comment

Please provide comments on the determination of adverse effect and draft MOA to me at amanda.murphy2@dot.gov within 30 calendar days from the date on this letter. If you have questions about this Project, Damon Tvaryanas with Amtrak can be reached at the number below. Following the 30-day comment period, FRA will consult further with consulting parties to resolve adverse effects to historic properties. Thank you for your cooperation on this Project.

Sincerely,



Amanda Murphy
Federal Preservation Officer
Federal Railroad Administration

Attachments:

- Attachment 1: Project Location and Area of Potential Effects (APE) Maps
- Attachment 2: Project Plans and Diagrams
- Attachment 3: Identification of Historic Properties in the Area of Potential Effects
- Attachment 4: Archaeological Disturbance Memorandum
- Attachment 5: List of Federally Recognized Indian Tribes
- Attachment 6: Draft Memorandum of Agreement

cc: Eric Rothermel, FRA Environmental Protection Specialist
Ramona Burns, FRA Project Manager
Damon Tvaryanas, Amtrak Lead Historic Preservation Specialist
(Damon.Tvaryanas@amtrak.com, 215-776-6962)
Ryan Morson, Amtrak Project Director, Penn Station Transformation Project
Nancy Herter, New York State Historic Preservation Office Director Technical Preservation Services Bureau
Jacquelyn Lipson, NJ TRANSIT Environmental Programs Manager, Environmental Compliance
Lisa Kersavage, New York City Landmarks Preservation Commission Chair
Frampton Tolbert, Historic Districts Council Executive Director
Keri Butler, Municipal Art Society President
Peg Breen, New York Landmarks Conservancy President