



August 26, 2026

Amanda Murphy
Federal Preservation Officer
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RE: Section 106 Consultation – Penn Station Transformation Project

Ms. Murphy,

On behalf of the Municipal Art Society of New York (MAS), we accept and welcome the opportunity to participate actively in the review process for the proposed Penn Station Transformation Project as a “consulting party” under Section 106 of NHPA, pursuant to 36 C.F.R. 800.2(c)(6).

MAS has advocated for New York City’s built environment, public spaces, and historic legacy for over 130 years. MAS concurs with the FRA’s determination that the project will have a potential adverse impact on historic and cultural resources within the Area of Potential Effects (APE). Given our long-standing interest in the future of the Penn Station complex and its surrounding neighborhood, we offer the following comments regarding the Federal Railroad Administration’s (FRA) recent Finding of Adverse Effect.

We are particularly concerned with the direct impacts to:

The Penn Station Service Building: The building at 242 West 31st Street is the sole remaining above-ground element of the original Penn Station, McKim, Mead & White's masterwork. Any demolition or significant exterior alteration would constitute an irreparable loss. MAS supports the current plan to preserve the original Service Building and integrate it into the new Penn Station complex through adaptive reuse while preserving its historic and aesthetic character.

Neighborhood Historic Resources: A number of historically significant buildings are located within the APE. These include the Lithuanian Alliance of America, a site with longstanding cultural ties to New York City’s Lithuanian community that is listed on the



National Register of Historic Places and as a New York City landmark. Also within the APE is the Church of St. John the Baptist, a French Gothic church constructed in 1872, and its adjoining brutalist-style monastery built for the Capuchin Order of friars. These are just two out of many nearby historic properties, some of which are eligible for listing on the National Register of Historic Places. Any large-scale neighborhood redevelopment proposal must consider the impacts both direct and cumulative on these buildings.

Because of our knowledge and concern about historic properties generally, and the historic properties surrounding the Penn Station district specifically, we believe we can provide important information and a valuable perspective as a consulting party under Section 106. MAS previously consulted on design plans for Phase 1 of the Moynihan Station Development Project 3, the TWA Hotel, and other New York City projects.

As a Consulting Party, MAS requests active participation in all upcoming working groups, design reviews, and planning meetings. We look forward to collaborating with the FRA, the New York State Historic Preservation Office (SHPO), and fellow consulting parties to safeguard New York's transit heritage.

Thank you for your consideration of our comments.

Sincerely,

Keri Butler

President
Municipal Art Society of New York