

To: Alan Tabachnick, Federal Preservation Officer, Surface Transportation Board, Office of Environmental Analysis

From: Laura Skolar-Gamarello, Trustee on behalf of the Jersey City Parks Coalition

Re: Docket AB 167_1189X - Comments on Revised Draft Memorandum of Agreement (MOA) for Conrail's proposed abandonment of the Harsimus Branch in Jersey City, NJ,

Good Morning Alan – In regard to the subject matter, am commenting today on behalf of the Jersey City Parks Coalition (JCPC) which is a consulting party in this matter as well as including some personal commentary that I feel compelled to express. I was present at the 6/8 consulting party zoom and am including some of the comments I made at that meeting. I am wondering about the progress of some of those items.

Please note that our President Paula Mahaysonand received your email communication of 6/14 however I did not. Can you please be sure to add me to the email list as I have been included in prior communications: auraskolar@gmail.com

The JCPC believes that the current MOA should not be executed. We understand that Conrail sold parts of the regulated rail line and is now belately applying for abandonment, compromising the quality of the Section 106 review. In terms of the mitigation outlined in the agreement it is woefully inadequate and does not represent what the non-profits involved in open space and preservation in Jersey City can endorse.

The Jersey City Parks Coalition is made up of 30 park organizations, including parks in the Historic Districts and neighborhoods through which the Harsimus Branch runs and that have been identified as being adversely affected should the Harsimus Branch be authorized for abandonment. Some of these neighborhoods and districts are represented by the consulting parties here, but others were apparently not invited to consult, and should be because of their special interests or proximity to the Branch.

- These include the **Bergen Arches Preservation Coalition**, which formed to advocate for the old Erie Rail Line to connect to the Harsimus Branch on the east and the old Boonton Line on the west, to accommodate the East Coast Greenway through Jersey City.
- Another is the **Historic Jersey City and Harsimus Cemetery**, which borders the Harsimus Branch at the west and has been found, in a State Historic Preservation Office Opinion in this Section 106 review, to be eligible for listing in the National Register as a Historic District. [It is now in the process of engaging a historian to write a Nomination.]
- **Friends of Mary Benson Park**. This park is a potential contributor to an Italian Village Historic District.
- **Enos Jones Park**. This park is proposed to connect to the Harsimus Branch as the City's proposed trail system is developed.

What is the progress on inviting these parties as well as advising the public and other individuals and property owners that may be adversely affected?

Although the current consulting parties appear to have done a good job of identifying historic resources that will be affected by abandonment, this phase of the Section 106 process has not yet received the careful attention it should get. It so far has resulted in no measures to avoid or minimize what could be a cascade of adverse effects resulting in the loss of an important and generationally valuable Jersey City asset.....once lost, never to be replaced. The proposed mitigation of recordation, documentation and interpretation is totally insufficient and quite frankly, a joke.

On a personal note:

As a lifelong Jersey City resident and local realtor for over 40 years, I am very familiar with the blight left by the railroads when their operations were no longer profitable. The Embankment, for instance, was neglected for decades and it fell to the City and residents along the length of it to organize cleanups along it; the most recent was last month.

Conrail was created by the government and exists with governmental support. But its unlawful sale was wrong. They don't appear to be trying to make up for it. And STB does not appear to be holding them accountable. *What are the consequences of Conrail's unlawful sale of property under the jurisdiction of this agency?*

Conrail should start acting like a good corporate citizen and contribute to a settlement of litigation that will preserve most of the historic Embankment and avoid adverse effects on all the historic resources along its route.

Please file this as an Environmental Comment. Thank you.

Laura Skolar-Gamarello
Trustee, Jersey City Parks Coalition
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