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MORIAL ASSOCIATION

FRIENDS OF ARLINGTON PARK

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HAMILTON PARK CONSERVANCY

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JERSEY CITY RESERVOIR
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SGT. ANTHONY NEIGHBORHOOD
ASSOCIATION

THE EMBANKMENT PRESERVATION
COALITION

THE HISTORIC JERSEY CITY &
HARSIMUS CEMETERY

VILLAGE NEIGHBORHOOD
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ASSOCIATION

WEST BERGEN LINCOLN PARK
NEIGHBORHOOD
COALITION

WEST SIDE
COMMUNITY ALLIANCE

June 19, 2017

Victoria Rutson

Director, Office of Environmental Analysis and Federal Preservation Officer

Surface Transportation Board

395 E Street, SW

Washington, DC 20423-0001

Re: AB_167_1189X NHPA Section 106 Review for Historic Harsimus Branch:
Cultural Resources Identification Report

Dear Ms. Rutson,

The Jersey City Parks Coalition is a nonprofit organization comprising 22 park organizations throughout the City. Our parks include six which are directly along or near the route of the historic Harsimus Branch or associated with it historically because they were located near the old Pennsylvania Railroad passenger line. These parks will all be affected by what happens to the Branch. Our member parks referenced here, almost all of which are historic parks, are:

- Hamilton Park, part of the Hamilton Park National Historic District bounded on the south by the Harsimus Branch Embankment
- The Village Park, in the historic old Italian Village area defined by the Pennsylvania Railroad (PRR) passenger and freight lines.
- Enos Jones Park, near the Bergen Arches/Erie Cut rail corridor.
- Van Vorst Park, part of the Van Vorst National Historic District, which includes the old Railroad Avenue (now Columbus) which once accommodated the elevated passenger line of the PRR.
- Paulus Hook Park, in the Paulus Hook National Historic District. Exchange Place in this district was once the eastern terminus of the PRR passenger line and the area is filled with historic businesses and warehouses connected to rail history.
- Historic Jersey City and Harsimus Cemetery, near the western end of the Harsimus Branch freight line where it joined the PRR passenger line at Waldo.

We also anticipate that while part of the Harsimus Branch may be used for rail, parts will also become park or remain open space, if your agency will protect the historic Branch from demolition. We have long supported the efforts of the City of Jersey City, the Embankment Preservation Coalition, Rails to Trails Conservancy, and others to preserve this resource.

It is impossible for us to thoroughly comment on the Cultural Resources Identification Report in the time allowed. We would therefore like to note that we especially appreciate the recommendation that the Jersey City & Harsimus Cemetery be recommended for listing on the National Register. This cemetery is a member of our organization. We also agree with the recommendation that the Embankment be considered a key contributing resource to an expanded Harsimus Cove National Historic District and an expanded Hamilton Park National Historic District. Hamilton Park Neighborhood Association is a member organization, and we anticipate that both it and Harsimus Cove Association, along with the Embankment Preservation Coalition, will be stewards for any open space retained by a preserved Embankment.

We further agree with the recommendation that the Embankment be considered a key contributing resource to the Pennsylvania Railroad New York to Philadelphia Historic District.

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We dispute, however, the consultants' view that the Embankment is a "discontiguous." The Harsimus Branch from Marin Boulevard to the Palisades, which includes the Embankment and a row of stanchions stretching out from Newark Avenue to the Palisades, clearly show the Branch still exists. We have also seen photographs that show the Branch met the Palisades at a still-existing abutment and that the area behind the Cemetery still contains the Branch roadbed and other structures along it. We understand that if underbrush were cleared the entire Branch there would still be clearly visible, as it is in GoogleEarth photos from earlier years. We therefore ask that the Harsimus Branch right of way, along with related rail structures, from Marin to CP Waldo, be recommended as eligible for the National Register as a historic district. Further, we ask that Marin to CP Waldo be considered a continuous key contributing resource to the Pennsylvania Railroad New York to Philadelphia Historic District.

As an advocate for open space throughout the City, both historic and recent, we are also concerned about other gardens and fields along the Branch that either do not yet have stewardship groups or are not yet members of our Coalition. These include the baseball field at Marin and Sixth Streets, the Brunswick Community Garden at Brunswick between Fifth and Sixth Street, the historic Mary Benson Park (built for immigrants who settled in the Italian Village a century ago), and open space along the Branch in the Hilltop area of Jersey City approaching Journal Square.

We understand the next phase of Section 106 is the identification and mitigation of adverse effects. We would like to be consulted during that phase. In the meantime, we note the following:

We support preservation of the entire Branch and its Embankment and endorse the efforts by the City of Jersey City, the Embankment Preservation Coalition, and other organizations and individuals for the reuse of the rail corridors as a monument to Jersey City's important railroad history and to serve residents of our City and the region for multiple public uses. Access to our parks by residents would be enhanced by the City's proposed preservation of the Branch.

We understand that historically appropriate adaptive reuse including rail, trail, and open space can be accommodated on the Branch. To the contrary, development of a segment of the Branch will have numerous adverse effects on the historic Branch itself, the National-Register-eligible Embankment, and numerous historic assets along its length – indeed, on a historic area that encompasses much of Downtown Jersey City and even The Hilltop section of our City.

Future Rail Use Is Historically Appropriate for a Rail Line

Jersey City at one time had a dozen railroads running through it. Reuse of the Branch for light rail would be historically appropriate and would provide a much needed transportation connection from Journal Square to the Hudson River waterfront. Port Authority Trans Hudson (PATH) trains from Newark and Harrison and Journal Square to Exchange Place, the former site of the Pennsylvania Rail Road passenger terminal on the Hudson River, and to the World Trade Center, with connections to Hoboken and 33rd Street in Manhattan, are at capacity. The system will be further strained by thousands of residential and commercial units coming on line in the near future. Preservation of the Branch for transportation use, its historic use, would relieve this strain.

When combined with the Bergen Arches/Erie Cut, the Harsimus Branch could also provide light rail to the Frank R. Lautenberg Rail Station, the major transportation hub at Secaucus Junction.

Our organization is especially interested in such light rail connections because they would provide better access to the many city parks along the route.

Future Trail Use Is Historically Appropriate Adaptive Reuse

The Harsimus Branch, along with the nearby Bergen Arches/Erie Cut, is the recommended off-road route for the East Coast Greenway, a National Millennium Trail from Maine to Florida. Other trails also propose to use the Branch, including the Liberty–Water Gap Trail, from the Statue of Liberty to the Delaware Water Gap; the September 11th Memorial Trail, which links the World Trade Center in New York, the Pentagon in Washington D.C., and the Flight 93 Memorial in Shanksville, Pennsylvania; and the Ice & Iron Trail, from suburban Montclair, NJ, to New York City.

Further, we support the Crossroads project of the Embankment Preservation Coalition, which builds on work done by them and the East Coast Greenway Alliance to bring the Greenway through densely populated Hudson County. Crossroads seeks to link proposed and existing trails into a network that would serve walkers and bicyclists in the region, connecting them with mass transit hubs as well.

The regional network promoted by Crossroads would also serve the remaining park members of the Jersey City Parks Coalition, with parks more remote from the Harsimus Branch. When completely realized, the Crossroads network would provide a five-minute walk to a trail network that would serve our City's burgeoning population, expected to reach 400,000 by 2050. It would allow residents, half of whom do not own cars, to walk, hike, and bicycle throughout the City and connect them with regional and national trails that would allow them to access the countryside: all without resorting to polluting motorized transportation.

Current and Future Open Space/Park Is Historically Appropriate Reuse

As part of an effort to mitigate global climate change, the Parks Coalition is currently in Year Two of a five-year effort to plant thousands of new trees in the City, which suffers from a severe canopy deficit. Through disuse, the Harsimus Branch as well as the Bergen Arches/Erie Cut has reverted to old field meadow and upland forest. Much of this could be preserved, even with co-use for rail and trail.

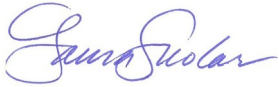
In addition, Jersey City is a city of neighborhoods, often formed around a neighborhood park that inspires civic pride and participation in our democracy. Preserved open space on the Embankment would serve the National Historic District of Harsimus Cove with its only park.

Branch Sale and Replacement with Buildings Are Adverse Effects on Historic Resources

Disassembly of the Harsimus Branch and its replacement with residential and/or commercial buildings in themselves constitute adverse effects on the historic transportation corridor and National-Register-eligible Embankment. Such treatment would also have severe adverse effects on numerous individual historic buildings, National Historic Districts, and, as we pointed out above, historic parks. It would introduce a long scar through the historic Downtown.

All these adverse effects flow from the sale of a segment of the rail line. We understand that your agency has the power to reverse unlawful sales, and ask that you do so. We further understand that your agency must preserve historic assets when reasonable means exist to do so, as they do here.

Sincerely,

A handwritten signature in blue ink, appearing to read "Laura Solar".

President

Jersey City Parks Coalition