



A non-profit 501(c)(3)
preservation organization
formed to preserve, protect
and promote Jersey City's
historic resources.

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JERSEY CITY LANDMARKS CONSERVANCY

June 18, 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 Landmarks Coalition is a nonprofit preservation organization formed in 1999 to preserve, protect and promote Jersey City's historic resources. Preserving the Embankment has been a campaign of JCLC for fourteen years and has been featured continuously on our website.

In the brief period allotted for public comment, our all-volunteer organization finds it simply impossible to comment to the extent the Report warrants. We regret this limitation, because our organization exists to protect historic resources throughout Jersey City and this Report touches upon so many of them. If you extend the Report comment period, we may comment further.

In the meantime, we note the following and ask that the agency provide much more time for what we understand is a part of the process devoted to identifying adverse effects.

Through the long local struggle to preserve the Embankment, we have come to recognize the historic significance of the entire Harsimus Branch and the important role it played on the local, state, and national levels. While we welcome the recommendations of the consultants to expand both the National Historic Districts of Hamilton Park and Harsimus Cove to embrace the Embankment, we observe that the Branch is integral to a wider historic fabric, and anything that happens there will affect this wider fabric.

We note that the consultants agree on the Branch's historic significance and we agree whole-heartedly with that finding, but we strongly dispute their conclusion that the Branch lacks integrity. We have seen photos of the extant part of the Branch in the generally inaccessible CP Waldo area. Combined with what is readily observable of the course of the Harsimus Branch from Marin Boulevard to Brunswick Street (the Embankment segments) and the Brunswick to Palisades area (the extant piers that marked the continuance of the aerial portion of the Branch), we believe this evidence demonstrates that the Branch retains the integrity necessary to convey its historic significance.

We therefore recommend that the Harsimus Branch from Marin to CP Waldo be recommended as eligible for listing on the National Register of Historic Places as a historic district. We further ask that the Report's recommendation that the Embankment segment is a contributing resource to the Pennsylvania Railroad New York to Philadelphia Historic District be amended to include the continuous Harsimus Branch from Marin to CP Waldo as a key contributing resource.

Again, we regret the time limitation that prohibits us from serious reflection on the many historic resources covered.

Sincerely,

Norrice Raymaker
President

