

From: Rachael D'Silva <harsimuscoveassociation@gmail.com>
Sent: Sunday, July 02, 2017 10:54 AM
To: kate.marcopul@dep.start.nj.us
Cc: Rutson, Vicki; andrea.tingey@dep.state.nj.us; Wayland, Joshua
Subject: Conrail Harsimus Branch Abandonment Exemption

EI-26137

Katherine Marcopul, Administrator and Deputy State Historic Preservation Officer
New Jersey State Historic Preservation Office
Mail Code 501-04B
State of New Jersey
Department of Environmental Protection
PO Box 420
Trenton, NJ 08625-0420
Re: Comments on the Cultural Resources Identification Report
Conrail Harsimus Branch Abandonment Exemption,
STB Docket No. AB 167 (Sub-No. 1189X)

Dear Ms. Marcopul:

I understand that the NJ State Historic Preservation Office is commenting on the Cultural Resources Identification Report for the Harsimus Branch. I request that you consider our organization's comments below, and in addition that you submit this letter with your comments to the Surface Transportation Board Office of Environmental Assessment. Though the Harsimus Cove Association (HCA) is a consulting party in this matter, we were not aware of this report until the deadline for comments had passed.

Our organization was formed in 1999 with the goal of promoting the well being and common good of the residents of the Harsimus Cove area and to facilitate communication between these residents and the community as a whole in order to improve the quality of life within Harsimus Cove and the City of Jersey City. The HCA is concerned that the conclusions reached by the Cultural Resources Identification Report overlooks the interests of our residents and if acted upon, could bring lasting harm to our neighborhood and its residents.

The HCA wholeheartedly agrees with the Report that the entire Harsimus Branch from Marin Boulevard to Chestnut Street has great historical significance, and indeed, should be recommended as eligible for the National Register of Historic Places. However, we strongly disagree with the Report that the Branch does not retain enough integrity to convey this significance. The Report's author, RGA Associates, minimizes the importance of the section from Marin to the Palisades, which includes the over-100-year-old stone Embankment and a row of stanchions stretching from Newark Avenue to the Palisades, and ignores the section on the Palisades to Chestnut Street, when aerial photos clearly show the Branch still exists, as evident in clearly visible abutments, roadbeds and other structures.

The Harsimus Branch Embankment on 6th Street is an asset of vital importance to the historical rise of Jersey City. As an integral piece of the Pennsylvania Railroad, the Embankment contributed to the development of both the New Jersey and New York ports, as well as the fabric of social life in Jersey City. The Embankment paved the way for the development of historic neighborhoods such as the National Historic Districts of Harsimus Cove and Hamilton Park. It was originally slated to be included in the Harsimus Cove Historical District, but in the interests of time and expediency, was left out. Its delineation as the boundary between the National Historic Districts of Harsimus Cove and Hamilton Park, however, makes it a valuable resource for the community, in addition to its historic significance. The Embankment, along with the rest of the Harsimus Branch, should be recommended as a part of the Pennsylvania Railroad New York to Philadelphia Historic District, not a "discontiguous" part of that district.

The HCA also asks that the STB's Section 106 process be corrected, as there is an obvious conflict of interest with Conrail's consultant, RGA Associates, now serving the STB OEA in what is supposed to be an independent investigation of cultural resources. The process should start by reversing the unlawful sale of the Embankment by Conrail. It should include an analysis of NHPA Section 110K violations. It should consider enabling the City of Jersey City to make an Offer of Financial Assistance to avoid all adverse effects to historic resources. STB should use only truly independent consultants, and should insure that the City and the public have the remedies available to them under federal law.

Finally, if the identification of effects of abandonment on historic resources in Jersey City proceeds, the HCA asks that our organization be fully engaged and that adequate time be scheduled for meaningful participation.

Thank you for the opportunity to comment.

Sincerely,

Rachael D'Silva
Acting President, Harsimus Cove Association

Copies: Victoria Rutson, STB OEA
Joshua Wayland, STB OEA
Andrea Tingley, NJ SHPO