



October 19, 2020

Surface Transportation Board
Washington, DC

Comments Re: AB_167_1189_X Harsimus Branch DSEA

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The nonprofit East Coast Greenway Alliance (ECGA) believes that the STB's Draft Supplemental Environmental Assessment (DSEA) proposal should ensure Conrail's responsibilities under the National Environmental Policy Act ("NEPA").

The ECGA encompasses 15 states and DC, 450 communities, and leads the development of the 3,000-mile Maine-to-Florida East Coast Greenway multi-use trail. We work with hundreds of volunteers, partner organizations, and officials at the local, state, regional and national level to continue moving more of the route onto protected paths. It is now 33% completed. This alliance is connecting people to nature and communities via a safe, accessible Greenway.

Our organization has been working with groups in Jersey City for several decades to plan for and implement a safe, off-road route for the East Coast Greenway. In 2004 a study funded by the NJ Department of Transportation recommended a route using the Harsimus Branch and Bergen Arches to get through the City. As recently as 2017, a study was published by NV5 for NJDOT and the ECGA, entitled: *ECG Essex-Hudson Greenway Connector Plan*. It reiterates the planned connections. All the cities and counties along the route have endorsed it. Recently, Hudson County, through the Open Space Institute, announced it is in contract to acquire the 8.6-mile Boonton Line to the west of the Arches to continue the trail into Montclair.

The DSEA avoids taking into account the negative effect an unconditioned abandonment could have on a number of environmental consequences of this project. Importantly, it does not address any plans for mitigation. The ECGA supports the comments on the DSEA filed by City of Jersey City, Rails to Trails Conservancy, and the Pennsylvania Railroad Harsimus Stem Embankment Preservation Coalition.

Sincerely,

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