



October 18, 2020

To: Adam J. Assenza
Environmental Protection Assistant
Office of Environmental Analysis
Surface Transportation Board
U.S. Department of Transportation

Cc: VNA Board of Directors

Re: Draft Supplementary Environmental Assessment issued September 10, 2020

Dear Mr. Assenza,

I am writing on behalf of the Board of Directors of The Village Neighborhood Association. The Village Neighborhood Association serves The Village neighborhood of Downtown Jersey City, with goals of increasing public safety, informing the community, promoting the arts, and fostering awareness of Village history. In 2019, the State Historic Preservation Office issued an Opinion that the Village is an Italian Village Historic District and its area encompasses part of the Harsimus Embankment, a contributing element.

The Harsimus Branch is also part of the Pennsylvania Railroad New York to Philadelphia National Historic District. Other National Register eligible sites in The Village are the Italian Educational and Cultural Center at Casa Colombo, White Eagle Hall, and the Historic Immigrant Catholic Church Historic District, encompassing Holy Rosary and St. Anthony of Padua churches. Both have festivals and religious processions that take place in front of the Embankment, and its loss and development would potentially displace these.

Our organization supports efforts by the City of Jersey City, Pennsylvania Railroad Harsimus Stem Embankment Preservation Coalition, and Rails to Trails Conservancy, to secure the right of way for public uses and thereby avoid the adverse effects that abandonment without conditions, will have on the historical resources, our community, the City, and the region. We understand that these allied parties, on one side, and Conrail and its developer, on the other, are negotiating a legal settlement expected to avoid many adverse effects that will occur from rail abandonment. We endorse the Coalition's vision for nature-oriented open space and trail on the Branch. We think this is in the spirit of NEPA, encouraging the existence of humans and nature "in productive harmony."

Because we understood that the agency was cooperating with this settlement attempt, we question whether the issuing of the DSEA means that the agency is moving toward an unconditioned abandonment rather than waiting for a settlement. We hope this is not the case, as an unconditioned abandonment does not appear to us to sufficiently protect the Branch, our community, City, and region from adverse effects.



Beyond the adverse effects to historic resources that we hope are being addressed in a separate NHPA process, the foreseeable loss of the corridor's open space and habitat is an intolerable effect. Our area is also subject to flooding, which will only worsen if the Embankment is removed or developed. We have read the original EA and Draft Environmental Assessment, and think these do not adequately comply with the spirit, purpose, and requirements of NEPA.

Sincerely,

Eric Hofmann

A handwritten signature in black ink, appearing to read 'Eric Hofmann', with a long horizontal flourish extending to the right.

President, on behalf of the VNA Board of Directors