

EI-2411

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Richard Willinger
22 Carlyle Court
Robbinsville, NJ 08691

June 29, 2006

Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street, NW
Room 700
Washington, DC 20423-0001

Re: Consolidated Rail Corporation - Proposed Abandonment in Mercer County, New Jersey - Robbinsville Industrial Track
STB Docket No. AB 167 (Sub-No. 1185X)

Dear Secretary Williams:

I am a resident of the municipality where the above proposed abandonment is located. I am writing in opposition to the abandonment of the 5.7 mile line of railroad, consisting of a portion of the Robbinsville Industrial Track between railroad milepost 32.20 +/- and railroad milepost 37.90 +/- in the municipalities of Hamilton Township and Washington Township, Mercer County, New Jersey, by the Consolidated Rail Corporation (Conrail).

I oppose the abandonment of this short stretch of railroad primarily for historical reasons. The Camden and Amboy Railroad may very well be the most historic railroad line in America. It is part of a 60-mile railroad line that runs from Camden, New Jersey, to South Amboy, New Jersey, running through 31 municipalities in four counties. The State Historic Preservation Office (SHPO) in New Jersey has determined that the entire line is eligible to be listed in the New Jersey and National Registers of Historic Places. This is not just a local historic property, and not just a State historic property, but is a national historic property.

The Camden and Amboy Railroad was chartered in 1830, over 175 years ago. The regulations and guidance governing Environmental Assessments consider railroad resources over 50 years old to be historic. The Camden and Amboy Railroad line is 3.5 times older. It is a miracle that so much of this railroad line has survived for 175 years. This country has advanced tremendously in the past 40 years with the passage of laws protecting the environment and historic resources. It would be a tragedy to destroy 175 years of history, especially since it has survived so long relatively unscathed and intact.

A report entitled *Cultural Resource Survey for U.S. Route 130/N.J. Route 33, Sections 14B, 14C, 14D and 17B, Hamilton, Washington, and East Windsor Townships, Mercer County, New Jersey, Volume One – Text*, prepared for the Federal Highway Administration and New Jersey Department of Transportation, Bureau of Environmental

Analysis, by Richard W. Hunter, et al., in March 1983 (Rev. June, 1985), describes the historical significance of the Camden and Amboy Railroad:

“The Camden and Amboy Railroad is historically significant for several reasons. In the history of American railroads, it was the first to be chartered in New Jersey, and the third in the entire country, following the Baltimore and Ohio, and the Erie. The Camden and Amboy was also the first operational railroad in New Jersey, the first to inaugurate regular service with a steam locomotive, and the first to introduce a number of important technical advances that were later adopted throughout the United States. The Camden and Amboy right-of-way through the U.S. Route 130/N.J. Route 33 project area was the railroad’s original line on which service to Hightstown from Bordentown was instituted in 1832, with through service to South Amboy beginning in 1833. ...

... (T)he Bordentown/South Amboy rail line remained a passenger carrier until 1938 and today it still carries some freight. The railroad gave tremendous impetus to the growth of settlement and the development of rural industry in the Trenton/Hightstown area. ...”

(Pages 36-37)

“As the first railroad to be built in the State of New Jersey, and the third in the United States, the Camden and Amboy Railroad is of immense historical significance not only in the 19th century development of the localities through which it passed but also in the growth of settlement and industry in the New York and Philadelphia metropolitan areas and in the entire Middle Atlantic region. This railroad opened up more distant markets to agricultural and industrial producers in central New Jersey and enabled a vast upsurge in the importation of raw materials, manufactured goods, foodstuffs, and other items into this area from elsewhere in the country. The railroad directly stimulated the establishment of many new industries and caused numerous other existing industrial operations to relocate closer to its course. With the expansion of industry came an accompanying residential growth and a proliferation of service industries. While new communities – of which Robbinsville and Windsor are but two examples close to the project area – emerged that were oriented physically and economically around the railroad. The Camden and Amboy Railroad was therefore the earliest primary force in the spread of urban and industrial culture into central New Jersey and it spurred far-reaching alterations in the environment, many of which still form a functioning part of the local and regional landscape today. As the first major transportational feature of its type in the New York/Philadelphia area, the Camden and Amboy Railroad clearly meets the criteria of historical significance set forth for the National Register of Historic Places”

(Pages 103-104)

This is an excellent study that I recommend to the Surface Transportation Board's (STB) Section of Environmental Analysis (SEA) for use in preparation of the historic preservation section of the Environmental Assessment.

Another excellent study about the Camden and Amboy Railroad that is even more comprehensive in scope that I recommend to the SEA, is the *Camden and Amboy Railroad Historic Districts Study, New Jersey, Volumes I and II*, prepared for the New Jersey Department of Transportation by Archaeological and Historical Consultants, Inc., in July, 2001. The study presents an inventory of historic resources associated with the Camden and Amboy Railroad, as well as historic contexts for the evaluation of cultural and archaeological resources. It "... involved background research on the history of the railroad and a field survey of the railroad and the municipalities through which it passes. An annotated bibliography was prepared for future research on the history and material culture of the railroad."

"The survey of the Camden & Amboy Main Line, from Camden to South Amboy, resulted in the identification of approximately 138 extant aboveground railroad resources. The survey also resulted in the identification of approximately 485 other extant historic resources in close proximity to the railroad, including industrial and commercial buildings, residences, railroad towns, and the like. Railroad towns that should be considered contributing to a National Register-eligible Camden & Amboy Main line historic railroad district include Prospect Plains, Cranbury Station, Robbinsville, Florence Station, and Stevens. A review of selected historic-period maps revealed the locations of 93 former railroad resources, including stations, yards, and culverts. Background research and field survey confirmed the SHPO opinion that the Camden & Amboy Main Line is eligible for the National Register."

(Page ii)

This study lists all of the railroad resources located in Washington Township and neighboring towns in and adjacent to the Camden and Amboy Railroad Main Line Historic District, including the railroad corridor itself, buildings, bridges, culverts, at-grade crossings and railroad towns.

The referenced information provided in the above study conflicts with Conrail's statements in the Historic Report filed with the STB that says that there are no railroad resources along the line segment, which they limit to railroad structures and bridges. They say "there is not a likelihood of archeological resources or any other previously unknown historic properties on the subject Line" based on their not having any document listing such resources. I respectfully refer Conrail to the above referenced study.

The *Camden and Amboy Railroad Historic Districts Study* describes the significance of the Camden and Amboy Railroad Main Line:

“The Camden & Amboy Main Line is significant for its pioneering innovations in railroad technology and railroad operating systems, including the invention of the ‘T’ rail, hook-headed railroad spike, fish plate, and the use of wooden cross-ties and crushed rock ballast. It introduced the block system for controlling railroad traffic. It pioneered the evolution of railroads from replacements of stagecoach lines between steamer ports to fully independent transportation systems.

The Camden & Amboy Main Line is also significant for the role it played in developing the northeast transportation corridor. ...

... As late as 1945, there were more than 200 sidings along the 60 mile length of the main line, the majority of which provided freight service to local industries....

Today, the Camden & Amboy Main Line is a single track railroad with sidings that is largely on its original alignment. Numerous railroad structures exist along its route, including railroad bridges, yards, stations, tunnels, at-grade crossings, and signals. The majority of these resources date to the Pennsylvania Railroad era of railroad operations, but some date to the period of the Camden & Amboy, and may have been built during the original construction of the railroad during 1831 – 1934. The line passes through generally rural areas and is associated with small towns and industrial facilities along its length that exist because historically, the railroad was there. With these features, the line evokes a strong sense of its historic past, when initially it was a single track line linking ferries and steamers in Camden, Bordentown, and South Amboy and was the only rail route between Philadelphia and New York. It also evokes a strong sense of the later periods of its history, when its primary role was to provide local passenger and freight service to central New Jersey during the era of railroad dominance in transportation. With these key features, the line retains integrity of location, design, setting, feeling, association, materials, and workmanship. It is significant under Criterion A for its importance in State and National transportation history. It is also significant under Criterion C as an excellent example of an early railroad corridor. It may also be significant under Criterion D for the information that extant and former railroad features may contain on railroad technology and operation. The features of the line itself confirm the New Jersey SHPO’s opinion that the Camden & Amboy Main Line is eligible for inclusion in the National Register as a linear historic district. As integral parts of the functioning of the railroad, all railroad resources inventoried along the line should be considered contributing to the historic district.”

(Pages 142 – 143)

The Camden and Amboy Railroad Main Line Historic District needs to be considered as a whole. You cannot just look at an activity affecting five miles here and four miles there. That would nickel-and-dime the linear railroad corridor to death. As the SHPO said in its comments to Conrail, “the adverse effects of the proposed abandonment of five miles of the surviving Camden and Amboy Railroad Historic

District must be evaluated and acknowledged within a cumulative adverse effects (impacts) context.”

I disagree with Conrail when they say that preserving the Line in locations where it abuts commercial businesses does not serve any historic or esthetic purpose. It is the corridor itself that is the character-defining historic feature. Just because there may be some new structures adjacent to the Line does not eliminate the historic value of the rail corridor. Just because a new building may have been built near the trail of the Lewis and Clark Expedition doesn't eliminate the historic value of the trail. You don't allow the destruction of a historic resource just because it is not historically pristine, especially when it is 60 miles long and 175 years old.

According to the *Camden and Amboy Railroad Historic Districts Study*,

“The New Jersey SHPO has indicated that the period of significance of the Camden & Amboy Main Line historic district is from 1831 when initial service began to 1965 when the first section of track was removed between Hightstown and Windsor. However, removal of the track did not have a major impact on the operation of the railroad, since it was by then providing only local freight service and continued to do so after the track was removed. In addition, the removal of the track did not have a major impact on the integrity of the resource, since most of the railroad remains intact and functioning, and since even where the track is gone, the railroad grade exists and is prominently visible on the landscape.”

(Pages 143 - 144)

“Because the Camden & Amboy was a pioneering railroad, archaeological research there has the potential to address a variety of early railroad technology. That the original stone sleepers remain in-situ within at least portions of the grade indicates that the grade itself may contain significant archaeological information.”

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In deciding upon Conrail's Notice of Exemption to abandon 5.7 miles of the Robbinsville Industrial Track, I respectfully request the Surface Transportation Board to:

1. Take into consideration the historic value of the entire Camden and Amboy Railroad Main Line Historic District in deciding Conrail's exemption request, not just the 5.7 mile segment they have requested to abandon. The Camden and Amboy Railroad Main Line is of national historic significance and any destruction of part of it contributes to the destruction of its overall historic value.
2. Deny Conrail's request to abandon the 5.7 mile segment of the Robbinsville Industrial Track, for the following reasons:
 - a. A key element that the STB takes into account when it considers an application for abandonment is whether continued operation of the line

would place a financial burden on the railroad. I could find nothing in Conrail's Notice of Exemption that said they were suffering a financial burden of actual or opportunity costs regarding this segment of rail line. Since Conrail has apparently not established a financial burden, the abandonment should be denied.

- b. If Conrail does demonstrate a financial burden, the abandonment should be denied because the public's historic preservation, transportation and environmental needs outweigh Conrail's financial burden.
 - i. The information contained in the first five pages of this letter document the need to preserve the historic resource of the Camden and Amboy Railroad Main Line Historic District, of which the 5.7 mile Robbinsville Industrial Track is a vital part. It is part of a national historic resource affecting the transportation history of New Jersey and the United States, the development of New Jersey and adjacent states, and technical railroad innovations.
 - ii. The Camden and Amboy Railroad Main Line could potentially be used for future rail transportation. Just within the past ten years, the southern portion of the Camden and Amboy rail line, from Bordentown to Camden, was restored and now serves as a light rail line called the River LINE. There have been newspaper reports of extending rail service through Monmouth County, which is just east of the Camden and Amboy Railroad Main Line. A 1997 study called the "Abandoned Railroad Inventory and Policy Plan" by the Delaware Valley Regional Planning Commission stated that, even though a section of the Camden and Amboy Railroad Main Line had been abandoned, it was still reasonable to restore it for freight and/or passenger service.
 - iii. According to Conrail, the 5.7 mile segment of the Robbinsville Industrial Track has not been used for two years. With the tremendous amount of new commercial, residential and industrial development occurring in the Route 130 corridor in Washington and Hamilton Townships, it is not unreasonable to envision a factory occupying an existing building or building a new factory along the rail line and using it in the near future.
 - iv. Abandonment of the 5.7 mile segment could result in environmental degradation to the surrounding area. Conrail knows that Washington Township wants to develop the rail corridor and land adjacent to it. The township is in the process of rezoning this land for development and in developing the land through the Township Redevelopment Agency. Development could include residential, commercial and industrial. Development will increase traffic and noise on the adjacent highway, Route 130, with increased air pollution and energy use, and could possibly cause the degradation of nearby wetlands.

3. Attach certain historic and public use conditions to the approval if, after consideration of all of the above, abandonment is approved. Even though there may normally be a time limit on such conditions, the need to preserve the Camden and Amboy Railroad Main Line Historic District constitutes such extraordinary circumstances that these conditions should be made permanent conditions of the abandonment approval. The conditions should include:
 - a. An order prohibiting conveyance of the land to private parties, unless it is another railroad.
 - b. An order requiring the land to be offered for sale first to New Jersey Transit, and, if they are not interested, to the State of New Jersey or County of Mercer for development as a linear park similar to the Delaware & Raritan Canal State Park.
 - c. If the land is conveyed to a public agency, an order prohibiting the public agency from selling the land to private parties or developing the land, and requiring the public agency to maintain the land in its current condition as an historic railroad corridor. Compatible uses such as rails-to-trails should be allowed.
 - d. If a public agency is not interested, an order requiring the land to be leased to a non-profit organization that agrees to maintain the property in its current condition as a historic railroad corridor, with compatible uses allowed such as rails-to-trails.
 - e. An order prohibiting Conrail from disposing of the track, track materials and cross-ties, and regrading the property. In addition to the corridor itself, these objects constitute the essence of the Camden and Amboy Railroad Main Line as a railroad. It has been a rail line for 175 years. Removing the railroad tracks would diminish this history.

The Surface Transportation Board may need time to obtain copies of the studies referred to above. If there is the possibility of the abandonment being automatically approved due to strict regulatory deadlines, I would request the Board to order a stay of their decision on the abandonment until all information about the historic value of the Camden and Amboy Railroad Main Line Historic District is obtained and evaluated. The criteria for granting a stay would be met because it would be in the public interest, other interested parties would not be substantially harmed, there will be irreparable harm in the absence of a stay, and there is a strong likelihood of prevailing on the merits.

I am attaching to this letter a map of the Camden and Amboy Railroad showing the towns it passes through and the years in which different sections of the rail line were constructed. This map comes from an article entitled "The Camden and Amboy Railroad: 150 Years of Service" by Frank C. Kozempel, in the magazine *The High Line*, Volume 5, Numbers 2 and 3, Autumn 1984 – Spring 1985, published by the Philadelphia Chapter of the Pennsylvania Railroad Technical and Historical Society.

Thank you for your consideration of my request to deny the abandonment or, in the alternative, to set historic and public use conditions on the approval. By my signature below, I certify service upon John K. Enright, Associate General Counsel, Consolidated Rail Corporation, 1000 Howard Boulevard – 4th floor, Mt. Laurel, NJ 08054.

Sincerely,



Richard Willinger

Enclosed are 10 copies

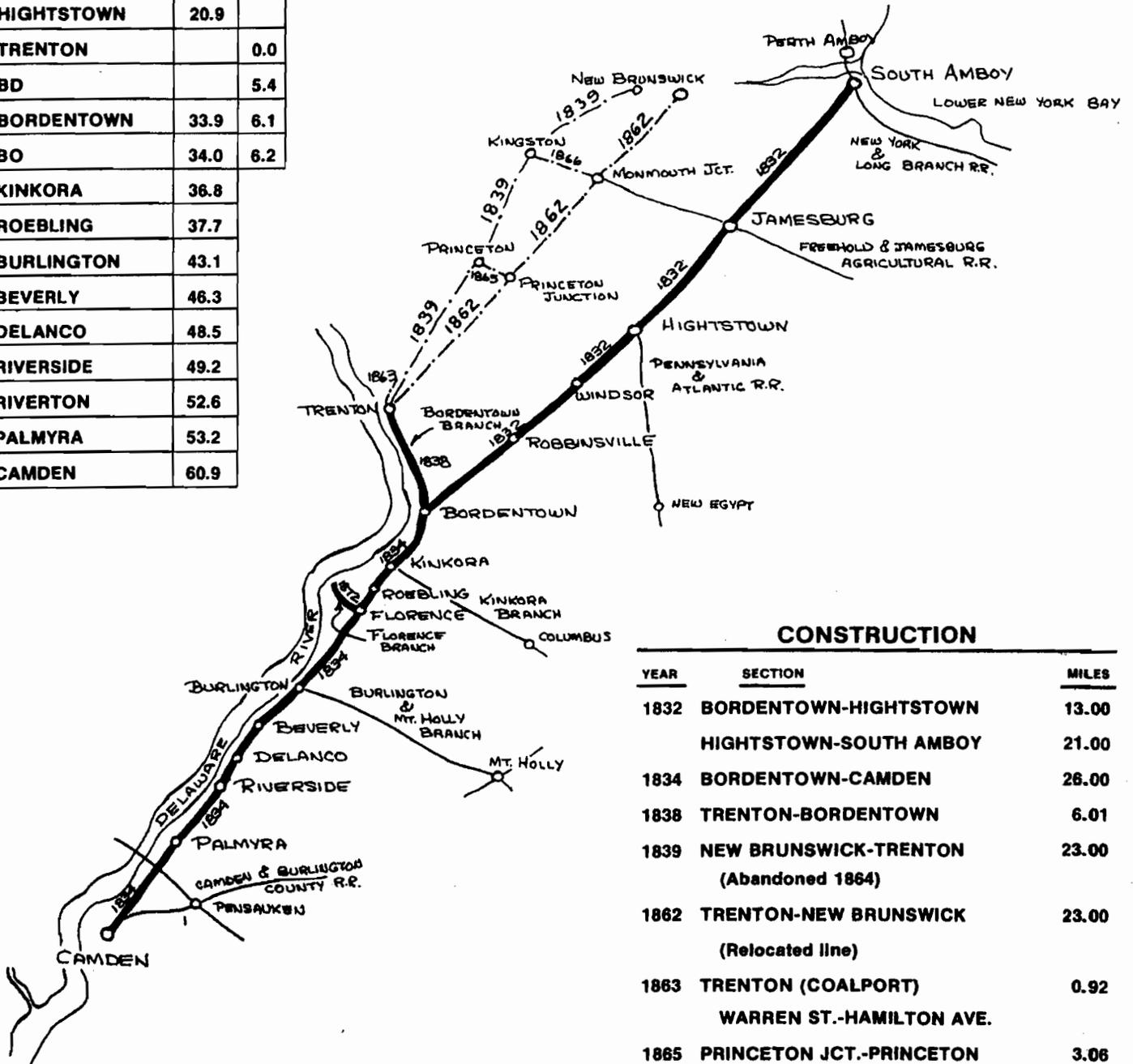
Map of Camden & Amboy Railroad

c: The Honorable Christopher Smith, United States Congress, New Jersey, 4th District
Dorothy Guzzo, Historic Preservation Office, NJ Dept of Environmental Protection
✓ Catherine Glidden, Section of Environmental Analysis, Surface Transportation Board
John K. Enright, Associate General Counsel, Consolidated Rail Corporation
John Kilbride, President, Camden & Amboy Railroad Historical Society
Rocky Swingle, President, Save Hamilton Open Space
Sean Simon, C&A Trail Conservancy
Swathy Keshavamurthy, Preservation New Jersey
Adrian Fine, NE Regional Office, National Trust for Historic Preservation
Donna Lewis, Planning Director, Mercer County
D.C. Agrawal/Richard Roberts, New Jersey Transit
James Badgley, New Jersey Department of Transportation
Regional Planning Division, Delaware Valley Regional Planning Commission
Director, Division of Parks and Forestry, NJ Dept of Environmental Protection
Al Buchan, Pennsylvania Railroad Technical and Historical Society
Hamilton Township Historic Preservation Advisory Commission
New Jersey Historic Trust
New Jersey Historical Commission
New Jersey Historical Society
Advocates for New Jersey History
Preservation Action
Save Americas Treasures
National Register of Historic Places

CAMDEN & AMBOY R.R.

MILES

SOUTH AMBOY	0.0	
JAMESBURG	13.4	
HIGHTSTOWN	20.9	
TRENTON		0.0
BD		5.4
BORDENTOWN	33.9	6.1
BO	34.0	6.2
KINKORA	36.8	
ROEBLING	37.7	
BURLINGTON	43.1	
BEVERLY	46.3	
DELANCO	48.5	
RIVERSIDE	49.2	
RIVERTON	52.6	
PALMYRA	53.2	
CAMDEN	60.9	



CONSTRUCTION

YEAR	SECTION	MILES
1832	BORDENTOWN-HIGHTSTOWN	13.00
	HIGHTSTOWN-SOUTH AMBOY	21.00
1834	BORDENTOWN-CAMDEN	26.00
1838	TRENTON-BORDENTOWN	6.01
1839	NEW BRUNSWICK-TRENTON (Abandoned 1864)	23.00
1862	TRENTON-NEW BRUNSWICK (Relocated line)	23.00
1863	TRENTON (COALPORT) WARREN ST.-HAMILTON AVE.	0.92
1865	PRINCETON JCT.-PRINCETON	3.06
1866	MONMOUTH JCT.-KINGSTON	4.31
1872	FLORENCE-WOODS IRON WORKS	2.04
CONTROLLED BY PENNSYLVANIA RAILROAD AFTER 1871.		
TRACK BETWEEN CRANBURY (M.P.17.5) AND WINDSOR (M.P. 24.1) REMOVED AT VARIOUS TIMES BETWEEN MID-1960'S AND 1983.		

KEY

- CAMDEN & AMBOY R.R.
- OTHER C & A LINES
- OTHER RAILROADS

Map drawn by the author