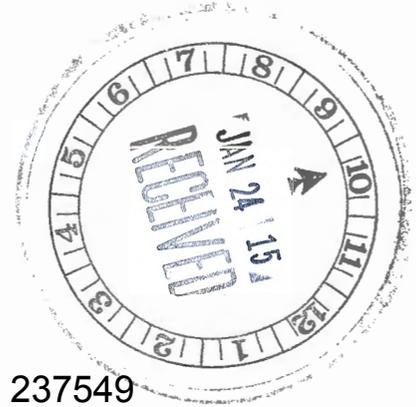


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17 January 2015

237549

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings
January 20, 2015
Part of
Public Record

Re: Conrail - Abandonment Exemption - in Hudson
County, N.J., AB 167 (Sub-no. 1189X)
and related proceedings AB 55-686X
and AB 290-306X

Expeditious Treatment Requested

Motion for Leave and Reply

Dear Ms. Brown:

On behalf of City of Jersey City, enclosed please find for filing a motion for leave to file a reply, and an attached reply, to replies filed January 12 and 13 by Conrail and interveners 212 Marin Boulevard LLC, et al ("LLCs") in connection with City's motion to compel Conrail's compliance with its duty under this Board's May 26, 2009 decision to provide valuation information required pursuant to 49 C.F.R. 1152.27(a). City has sought expeditious treatment on the motion, and accordingly marks its related pleadings for such treatment.

Conrail's reply sought additional information (provided herein), and the LLCs' reply insinuated, based on a sealed Exhibit A, that the shipper statement tendered by City under seal contained false information. A portion of our filing

today, also tendered under seal, demonstrates that the LLCs did not investigate the correct location and that their accusations are misplaced. City is concerned as well at this point that they are attempting to intimidate potential shippers. The motion for leave to file a reply discusses the other reasons to permit this reply to a reply.

The 1152.27 information from Conrail is long overdue.

Thank you for your assistance in this matter.

Respectfully

A handwritten signature in black ink, appearing to read 'C. H. Montange', written in a cursive style.

Charles H. Montange
for City of Jersey City

Encl. Motion for leave and Reply (public) (ten plus original)

cc. Per certificate of service

BEFORE THE SURFACE TRANSPORTATION BOARD

Consolidated Rail Corporation -)
Abandonment Exemption -) AB 167 (Sub-no 1189X)
in Hudson County, NJ)

Motion for Leave to File a Reply

This Board's procedural rules bar replies to replies, but from time to time, this Board grants leave to file a reply in order to complete or to correct the record. For the reasons stated, leave should be granted here.

On December 24, City of Jersey City ("City") filed a Motion to Compel Conrail to supply information pursuant to 49 C.F.R. 1152.27(a) that Conrail was originally ordered to supply by this Board on May 26, 2009. Conrail filed a reply on January 10 refusing to supply the information. This is tantamount to seeking reconsideration out of time of this Board's May 26, 2009 decision and indeed amounts to a request for exemption from OFA procedures. Conrail fails to comply with 49 C.F.R. 1114.5 for either purpose. City is entitled to complete the record by pointing that out. In addition, Conrail expresses confusion concerning what property the City wishes the 1152.27 information. We believe this contrived because it did not emerge until 4-1/2 years after Conrail was told to supply the information. However, to give Conrail some guidance, we are

providing herewith on the record (if this reply is permitted) a tax parcel map showing those parcels City wishes addressed.

On or about January 14, Conrail's chosen developer for the rail line in question (212 Marin Boulevard, LLC, et al, referred to herein as "the LLCs") filed a reply. That reply contains a sealed Exhibit A in which the LLCs appear to charge the City, a shipper, and City's counsel with filing false and misleading documents with this Board. The LLCs' counsel Horgan followed this up with a "demand letter" on January 14 suggesting that City, the shipper, or counsel were in violation of 18 U.S.C. 1001 and purportedly demanding a response. A copy of this demand letter is Appendix I to the City's sealed Response tendered herewith. The LLCs are throwing around serious charges. It turns out that these charges are based on an "investigation" by the LLCs' counsel Horgan. He evidently inquired into the wrong property. The LLCs thus make arguments that are based on incorrect material. In order to correct the record, especially in light of Horgan's insinuations, and also because Horgan basically demands us to reply with his referenced demand letter, City seeks leave to file the Reply enclosed, including the sealed Response to those portions of the LLCs' insinuations and inaccuracies which they filed under seal.

In addition, the LLCs rely on a lawsuit they filed to preclude the City from using OFA procedures, in which they claim

they have now taken a default. The Jersey City Law Department thought it had assigned the case to outside counsel for defense. The City wishes to make it clear that it will take appropriate measures to remove the default and obtain a dismissal of this suit. It is my understanding that outside counsel has already sought consent to voluntarily vacate the default. This serves as another basis for granting leave to file a reply.

For the reasons stated herein and in City's reply, leave should be granted to City for file this reply to correct the record. The Reply is set forth below.

Respectfully submitted,

Charles H. Montange
426 NW 162d St.
Seattle, WA 98177
(206) 546-1936
Fax: -3739
Counsel for City of Jersey City

Attached: Reply (public version)

BEFORE THE SURFACE TRANSPORTATION BOARD

Consolidated Rail Corporation -)
Abandonment Exemption -) AB 167 (Sub-no 1189X)
in Hudson County, NJ)

REPLY ON BEHALF OF CITY OF JERSEY CITY

I.

City of Jersey City (and, independently, CNJ Rail) long ago filed an intent to file an "offer of financial assistance" ("OFA") in this proceeding. Conrail sought rejection (exemption) from OFA. Decision served May 26, 2009 at 2. This Board's decision of May 26, 2009, refused to grant Conrail's request for an OFA exemption (rejection of the notice of intent) and instead required Consolidated Rail Corporation ("Conrail") to supply the information required pursuant to 49 C.F.R. 1152.27(a) before City of Jersey City ("City") is required to file that OFA. The Board indicated that there was no need to delay the provision of 1152.27(a) information pending resolution of other issues. May 26, 2009 Decision at p. 2. This abandonment proceeding cannot be concluded until Conrail supplies the information that this Board ordered it to provide.

In the May 26, 2009 decision, this Board also stated that it would require any OFA applicant to make a showing concerning

shipper need, public support and feasibility. That showing is due at the time an OFA is filed.¹

To date, Conrail has refused any discovery by the City, and has also refused to supply any of the information this Board stated Conrail must supply in this Board's May 26, 2009 decision; namely, Conrail must supply City with information germane to valuation and operation of rail property. On December 24, faced with a shipper statement seeking rail service by April that on its face could be supplied by a transload on the Harsimus Branch, City filed a motion to compel Conrail to

¹ City timely filed a "protective appeal" (and request for clarification) of the May 26, 2009 decision insofar as it required the City to make showings. Conrail and the LLCs did not timely appeal. Instead, Conrail at the time merely argued that the appeal was improper, or premature, and should be dismissed. Conrail Reply filed May 18, 2009.

As Conrail's latest Reply makes clear, the railroad continues to refuse to supply the information. Conrail's chief argument is that City should wait until this Board rules on City's appeal concerning whether it has to make the required showings. Conrail Reply at p. 1. This is contrary to the Board's indication that Conrail should act forthwith at p. 2 of the May 26 Decision. In any event, Conrail must supply the information whether or not this agency grants City's protective appeal, so the appeal is thus no excuse to dally. Whether the agency grants the relief sought in the appeal or denies it has no bearing on Conrail's duty to provide the 1152.27 information. Since a shipper promising substantial employment (see exhibit attached to this Reply) has approached the City with a bona fide need, City feels obligated to proceed, while reserving its position in its protective appeal. The protective appeal does not encumber Conrail's ability or obligation to supply the information and accordingly to Conrail is premature anyway.

supply the information required to be provided by this Board in its May 26, 2009 decision, by a date certain.

In its Reply on January 10 to the motion to compel, Conrail basically seems to demand that this Board reconsider its May 26, 2009 decision and require yet more showings in advance of any filing of an OFA. In essence, the LLCs make the same request to this Board, making all kinds of insinuations about the shipper, and urging this Board to allow Conrail to dally.

The position of Conrail and the LLCs is contrary to the OFA statute and regulations. This Board did not grant Conrail's request for an exemption from OFA in its May 26, 2009 decision. This Board ordered Conrail to supply information. The "replies" of Conrail and the LLCs amount to a request, filed way outside the normal time period for appeals and motions for this Board to reconsider allowing the OFA process to proceed. If the LLCs and Conrail seek to obtain any reconsideration of the May 26, 2009 decision at this point, they should comply with 49 C.F.R. 1115.4, governing petitions to reopen administratively final actions. Per 1115.4, they need to state in detail how the May 26, 2009 decision was in material error, or provide new evidence or substantially changed circumstances meriting overturning the May 26, 2009 decision. They do not purport to show anything of the sort. To reiterate, City filed a motion to compel material that was supposed to be supplied before the City

is required to file an OFA. Conrail and the LLCs have responded with what amounts to a request for de facto or de jure exemption from OFA procedures, but without any required showings and in the face of the May 26, 2009 decision to the contrary.

This Board simply does not grant exemptions from OFA in the circumstances here. As this Board said in Norfolk Southern Railway - Abandonment Exemption - in Orange County, NY, AB 290 (Sub-no. 283X), served May 2, 2007,

"the OFA provisions ... reflect a Congressional intent that rail service be preserved whenever possible. While exemptions from 49 U.S.C. 10904 have been granted from time to time, they have been granted when the right-of-way is needed for an overriding public purpose [footnote omitted] or an important private undertaking [footnote omitted citing case involving conversion of line to private rail use for a shipper], and there is no apparent interest in continued rail service [footnote omitted]. Here, the petition for abandonment is not tied to a public project, and no transfer to facilitate private rail operations is referenced by NSR. Also, [a party] has shown an interest in providing continued rail service, despite the absence of an active shipper on the line for almost 2 years. Accordingly, the Board finds no basis for undercutting the Congressional objective of maintaining rail service,

despite the fact that prospects for a successful OFA are marginal. Therefore, NSR's request for an exemption from the OFA requirements of 49 U.S.C. 10904 will be denied."² Nothing Conrail or the LLCs offer justifies the exemption from OFA procedures they seek. They do not claim that an exemption is needed to foster any public purpose and they advance no important private undertaking (certainly not any facilitating rail use). In contrast, City and CNJ Rail have shown an interest in continued rail service. Conrail and the LLCs show no material error, new evidence, or changed circumstance to warrant reconsideration of this Board's May 26, 2009 refusal to exempt the line from OFA. Indeed, the only new evidence germane to whether an exemption should be granted is a new shipper (motion to compel Exhibit D) who supports use of OFA procedures. It follows that Conrail must comply with the requirement that it supply the 1152.27 information. This Board should so order by a date certain per City's motion.³ Conrail continues to drag its

² AB 290-283X is interesting for another reason. In that case, Norfolk Southern, a parent of Conrail, sought to convert a former Conrail line of railroad into exempt spur track so it could be used for car storage or disposed of as NS saw fit without further federal regulatory action. Conrail inexcusably failed to follow lawful procedures, and instead illegally purported to sell a line to a developer without any abandonment authorization.

³When the ICC Termination Act was adopted in 1996, Congress eliminated the requirement that the Board determine an OFA was "bona fide" before initiating an OFA proceeding. When STB conducted its rulemaking to revise the ICC abandonment

feet, while its chosen developer continues to blast away in its war of attrition against Jersey City and its citizens.

II.

Conrail professes confusion at pp. 3-4 about what property the City is interested in, claiming it thought the City interested only in the Embankment. City's "notice of intent" specified four overlapping segments of this line for OFA: Waldo to Washington, Waldo to Marin, intersection of Conrail's National Docks line to Washington, and intersection of Conrail's National Docks line to Marin. See City's Notice of Intent in AB 167-1189X, filed March 27, 2009, at p. 1. In short, City's OFA intentions have never been limited to the Harsimus Embankment. In addition, the City's OFA intentions all along have indicated a potential transload, at least initially, adjoining either Waldo or the intersection with National Docks (or potentially both), or elsewhere along the line. The fastest way to provide transload for shippers will be an interim facility at Waldo or between Brunswick and National Docks, or a combination thereof.

regulations to conform to changes made by Congress in ICCTA, the agency accordingly eliminated the requirement that OFA applications be determined bona fide. Rails to Trails Conservancy (RTC) filed comments asking that the agency retain a requirement that OFA's be determined bona fide. This agency rejected RTC's position, stating that that "49 U.S.C. 10904 clearly does not retain that aspect of the prior statute." Abandonment and Discontinuance of Rail Lines, Ex Parte No. 537, decision served Dec. 24, 1996, slip at p. 15.

Because Conrail has been totally unforthcoming, City does not know what Conrail's position concerning the allowable boundaries, or possible boundaries, of the Harsimus Branch from the western edge of the LLCs' illegal acquisition (that is, a point just west of the Turnpike) to Waldo. Until further information is supplied, City at this point provisionally states that it would like to acquire as much width of the Harsimus Branch per the tax parcel maps in those areas as it can afford. Since Conrail professes a need for further specification, and to move this along, City provides herewith as Attachment I a tax parcel map prepared by Hudson County Planning at City's request. City desires the 1152.27 information for a 60 foot corridor from end of the LLCs' illegal acquisition (purple) to Waldo (estimated area is 50,155.77 sf of fee and aerial easement per County Planning). City also requests information concerning (1) Block 10901, lot 92; (2) Block 10901, lot 120 (as to the portion remaining after the illegal sale); (3) Block 10901, lot 122; and (4) "alternate A" on Attachment I.

Block 10901, lot 109, includes the at-grade National Docks line, which is active. City seeks an aerial easement compatible with the historical location of the Harsimus Branch over that line, as well as the ability to interconnect with the National Docks line at-grade for a transload. The City may seek to acquire at-grade rights in lot 109 and possibly 118, 110 and 111

for truck and equipment access to lot 92 (historically apparently over an access road in the area of lots 118, 110 and 111) and/or for interconnection for transload facilities connected to the National Docks line. In addition, City request information on the remaining freight track paralleling passenger facilities south of Waldo and adjoining lot 92.⁴

City cannot reliably work up designs much less optimize and finalize transload plans until it obtains information from Conrail indicating what property the railroad will make available and at what price. As noted, City currently plans to acquire as much of lot 92 as it can afford. If Conrail disputes providing any of this information, on the basis of some boundary issue, then we request that Conrail seek to resolve this amicably with the City rather than force the issue back to STB, and in any event supply information (without prejudice to the City to object) on boundaries to which Conrail will not object. We are providing this information to be helpful, and not to precipitate more pre-litigation before an OFA can be filed. In addition, Conrail may get some business by assisting a shipper with its rail transload needs.

III.

⁴ All referenced lots are indicated on Attachment I.

The LLCs, relying on an affidavit by their counsel under seal, assert that the shipper affidavit supplied as Exhibit D to City's motion to compel is a sham. The LLCs contend the City, or the shipper, or both made misrepresentations to the Board. The arguments and evidence the LLCs provide for these positions are purportedly set forth only in the LLCs' sealed Exhibit A, not available to the public. On the basis of that sealed Exhibit A, they sent a "demand for inquiry" ("demand letter") on January 14 (attached as Appendix I to our sealed Response) to counsel for the City insinuating that the shipper statement constituted a violation of criminal law. It turns out that the LLCs' accusations in their sealed Exhibit A are fundamentally wrong, which in turn washes away their allegations in their public pleading. The LLCs' errors are based on a sealed affidavit by the LLCs' counsel in which he describes the result of his investigation into the wrong site. Because the LLCs' filed their arguments and purported investigation results under seal, City annexes hereto a Response under seal. The sealed Response puts to rest the claims and insinuations of these LLCs in their pleadings, sealed or otherwise, and to their demand letter.

City, however, publicly reiterates a concern it expresses in the sealed document that the LLCs are now attempting - both in their sealed document and via their demand letter - to

intimidate the shipper with threats of litigation. The LLCs have a track record of attempting to intimidate any person or entity in or outside the City whom they feel provides credible support to the City's efforts to preserve the Harsimus Branch.⁵ As applied to this shipper, the LLCs' intimidation tactics now jeopardize blue collar jobs in Jersey City, as explained in the City's sealed response (filed herewith) to the LLCs' sealed allegations.

⁵The basic legal theory of Conrail's chosen developer (the LLCs) and, at least until the ruling of the D.C. Circuit in City of Jersey City v. Conrail, supra, 668 F.3d 741, Conrail as well, is that the City should have joined Conrail and the LLCs in evading federal jurisdiction over abandonment of rail lines. Their view was that the City should ignore STB and simply use state law eminent domain to buy the line. That was a central point of their SLAPP suit against City et al's undersigned counsel in 212 Marin Boulevard, et al v. Montange, HUD-L-2196-11. The LLCs are still asserting that view in state court, where they are suing City and threatening "others" (the suit lists a host of John Doe defendants) with liability for damages until and unless they also join the LLCs and Conrail in evading federal remedies. The LLCs manager, referencing the LLCs' suit against the City for violating 42 USC 1983 and tort law for asserting this agency's jurisdiction, publicly indicates that he implements his threats to punish his adversaries. Transcript of Zoning Board of Adjustment Proceeding, City of Jersey City, March 30, 2011 at 134. The developer acknowledges that he has threatened to bankrupt personally the leadership of the Embankment Preservation Coalition "when this is all over." Transcript, supra, April 5, 2011, at p. 146. He also said he would "devastate" the City. Id. at 140. The developer has brought a myriad of costly "OPRA" claims against the City as well as the Embankment Preservation Coalition and one of its members. The latest round of LLCs litigation on that front (212 Marin Boulevard LLC v. City of Jersey City et al, HUD L-6131-11) against the City, the Coalition, and its member, was dismissed with prejudice on November 14, 2014.

IV.

The only other feature in the LLCs' reply that necessitates further response is the LLCs' reference to a lawsuit they filed on November 7, 2014, to prohibit or to inhibit the City on state law grounds from invoking federal OFA remedies on state law grounds. The LLCs, through the same attorney now representing them here, have previously tried to direct the City's legal strategy by filing an ultimately unsuccessful state law SLAPP suit entitled 212 Marin Boulevard, LLC v. Montange, referenced in footnote 5. In that suit, the LLCs tried to prevent the City from invoking STB jurisdiction and federal remedies against the illegal abandonment of the Harsimus Branch by Conrail and against Conrail's illegal transfer of the portion of the Branch containing assets protected under section 106 of the National Historic Preservation Act to the LLCs. (Even the LLCs now contend that sale was a fraudulent action by Conrail against not just them, but this agency, the Courts and the City as well.⁶) The SLAPP suit was ultimately dismissed, as indicated in documents already filed in this proceeding. When the undersigned furnished the LLCs' January 13 Reply to the City

⁶ See City et al's Notice of Decision and Request for Lifting of Stay of Proceeding at 3-4 and attached exhibit, filed Nov, 2, 2013 in AB 167-1189X. Conrail responded that the LLCs knew of the fraudulent representations at the relevant times and actually participated in making them.

Law Department, the Law Department candidly was surprised by what amounted to yet another lawsuit to direct the City's legal strategy in connection with proceedings before the STB, much less a purported January 13 default notice in that lawsuit. The undersigned is authorized to represent that the Law Department immediately assigned the case to John Curley, who has successfully represented the City in most of the myriad of state lawsuits the LLCs have unleashed against the City over the years. Mr. Curley authorizes me to represent that he has already sought a voluntary lifting of the default. If the LLCs decline to act rationally, he will move to vacate the default and to file an answer. He will then answer the lawsuit and seek its dismissal. He notes that default is not a default judgment but instead is vacated on timely application.

All of the negative inferences by the LLCs are fruits of their imagination. When the LLCs shoot shotgun blasts seemingly every few moments at the City or its supporters, the fact that the City or a supporter does not realize that a new blast has been fired, or confuses it with an old one, and somehow fails to dodge another tiresome pellet is not grounds for assuming that the City is dead, or has been dead, or should be dead, or wants to be dead, or grossly incompetently dead, or whatever other metaphor best sums up the position or accusations of the LLCs. The City continues to wish to be managed by its elected leaders

and their advisors, not by the LLCs. The City's underlying cause remains meritorious. The Harsimus Branch is the last underused transportation corridor available to serve downtown. It contains an historic asset. The City has authorized Mr. Curley to proceed in defense of the LLCs' latest. STB should leave the issue of the LLCs' state claims to the state courts. City assures STB that its interest in OFA remains secure.

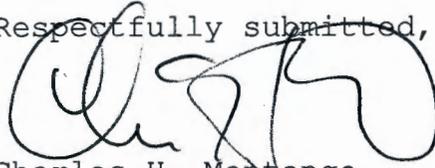
V.

The LLCs make many allegations, and City's failure to deal with any particular matter raised by them or Conrail should not be construed as consent. The issue at this time is simply whether Conrail should comply with this Board's prior order to supply OFA information. Since this Board refused to grant an OFA exemption, all the fire and brimstone mounted by the LLCs and Conrail amount only to an out of time effort to obtain an exemption without making the showings for it, or to attempt to reopen the May 26, 2009 decision out of time, without the requisite showings. We make this reply solely to complete and to correct the record on points in which Conrail and the LLCs have seemingly requested a response, raised some new issue not raised in our motion, or went overboard with insinuations.

The Embankment Preservation Coalition has authorized us to state that, contrary to another set of insinuations by the LLCs in their "Reply" at the bottom of p. 7, the Coalition did "ghost

write" anything filed by the City in connection with the City's motion to compel 1152.27 materials.

Respectfully submitted,



Charles H. Montange
426 NW 162d St.
Seattle, WA 98177
(206) 546-1936
Fax: -3739
Counsel for City of Jersey City

Exhibits

Attachment - parcel map
Sealed Response dealing with LLCs' sealed exhibit A
(this document is filed separately under seal)

Certificate of Service

The undersigned hereby certifies service by posting the foregoing in by deposit with U.S. Mail, postage prepaid first class, on or before the 17th day of January 2015 addressed to the parties or their representatives per the service list below, and by electronic delivery to Andrea Ferster (General Counsel of Rails to Trails Conservancy) and Maureen Crowley (representative of Embankment Preservation Coalition) unless otherwise indicated. The sealed exhibit is being furnished only to counsel for parties who have signed the relevant undertaking under the protective order.



Service List

[AB 167 (Sub-no. 1189X)]

- with address corrections as of August 2014 -

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And the following self-represented individuals or entities:

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Chicago, IL 60604 (attorney for CNJ Rail Corp)
(email attachment and US Mail)

Exhibit

Parcel Map



 Corridor - Alternate A

 446 Newark Avenue LLC

 415 Brunswick Street LLC

 Block

 National Docks (active)

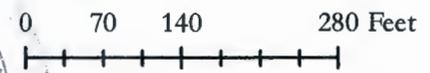
 Corridor

 Lot

 River Line (abandoned)

 PATH rail lines

Lot	Corridor (sf)	Corridor - Alternate A (sf)	Difference
92	36,170.14	41,970.32	5,800.18
110	96.60	96.6	0.00
120	9,733.69	15,394.69	5,661.00
109	4,155.34	8,690.15	4,534.81
Total	50,155.77	66,151.76	15,995.99



Prepared by
Hudson County
Division of Planning

