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Ann D. Begeman,
Chairman Surface Transportation Board
395 E Street SW
Washington, DC 20423

RE: Docket No. AB-1261 New York State Department of Environmental Conservation
– Adverse Abandonment – Saratoga and North Creek Railway

Dear Chairman Begeman,

While I am aware that the comment deadline has passed, I recently have come upon information that may be of critical importance to your decision in this case.

It is my understanding from media reports that a determination by the Surface Transportation Board is imminent regarding the proposed abandonment of the Saratoga and North Creek Railroad. This action comes at the request of the New York State Department of Environmental Conservation (NYSDEC).

The railroad in question continues through Warren County, NY, into Essex County, NY, where it terminates at Tahawus, which is the location of the Sanford Lake Mining District and an ilmenite (titanium ore) mine previously operated by NL Industries. The Geological Society of America's 1991 publication titled, *Economic Geology, U.S.*, pages 135-137, describes titanium as “an important strategic and critical material because of its use in the aerospace industry, especially in airframes and jet

engines.” There are two primary ores of titanium: rutile and ilmenite, of which the vast majority mined is ilmenite. It is “the major raw material source for titanium.”

Furthermore, “the Sanford Lake District [was] at one time the leading producer of ilmenite in the world....” The United States now imports “most rutile and much of ilmenite.” NL Industries closed the Sanford mine in the 1980s. Through its subsidiary, KRONOS, its main source of ilmenite titanium ore is a mine in Norway. I do not know how much ore remains at Sanford Lake, but there are other Adirondack mining operations that were discontinued because it was cheaper to get the material elsewhere, leaving as much or more of the resource in the ground as had been removed.

While NYSDEC is requesting “interim” trail use of the line, this will be used as a spear point by individuals who want to see the railroad leading to Tahawus destroyed and replaced permanently by a “rail trail.” I would argue that it would be very unwise to assume that current patterns and economics of trade will never be disrupted, and to eliminate the only rail access to a major source of a “strategic and critical” resource could end up as folly. At the very least, the size and value of the remaining ore at Sanford Lake should be determined before making a decision to abandon the railroad that could transport that ore, when and if it is needed.

Sincerely,

Philip L. Gallos

CC: All Parties of Record, via United States Postal Service

CC: Sen. Chuck Schumer; Sen. Kirsten Gillibrand; Rep. Elise Stefanik; NYS Sen. Betty Little; NYS Assemblyman Dan Stec; Warren County, NY, Board of Supervisors; Essex County, NY, Board of Supervisors; Saratoga County Board of Supervisors.