

Revolution Rail Co.
3 Railroad Place, PO Box 202
North Creek, NY 12853

248322

Secretary of the Board
Surface Transportation Board
395 E Street, S.W., Suite 100
Washington, D.C. 20423

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Office of Proceedings
August 15, 2019
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Public Record

August 15, 2019

RE: STB No. AB-1261

Dear Secretary of the Board,

We write today with respect to STB No. AB-1261, the filing (the "Filing") by the New York Department of Environmental Conservation ("NYDEC") requesting adverse abandonment of a 30-mile section of railroad commonly known as the Sanford Lake Branch or the Tahawus Line (the Line), between milepost NC 0.0 at North Creek, New York and the Line's terminus near the former Tahawus Mine at milepost NC 29.71 (the "Line").

We are the founders and owners of Revolution Rail Company ("RRC"), a railbiking excursion company based in North Creek, NY (see Appendix 1 - Founder Biographies). Railbiking involves pedalling specially-designed vehicles on railroad tracks. Railbiking is a relatively new activity in the United States. A video demonstrating the activity is available at <https://www.youtube.com/watch?v=6mIW4iTfEBA>.

RRC was launched in July 2017. Since then, our business has employed 22 people, paid out over \$150,000 in wages, and generated over \$37,000 in federal and state tax revenue. RRC has made dozens of cash and in-kind donations to local and regional organizations, and brought well over 35,000 people to North Creek to enjoy an accessible, affordable and family-friendly excursion while exploring a portion of the Adirondacks in a low-impact way.

The economic multiplier effect of our excursion business has been substantial. Our customers have traveled to the Adirondacks from all over the United States and, indeed, the world, injecting their hard-earned dollars into the state and local economy to pay for travel (airfare, passenger train fare, rental cars, taxi cabs, and gasoline), lodging and accommodations (hotels, inns, campgrounds, and smaller scale bed-and-breakfasts), meals and refreshments, and additional tourism spending (complementary excursions such as whitewater rafting, souvenirs, etc.). A precise figure is impossible to calculate, but a conservative estimate (i.e., every rider spending at least \$10 on something over the course of their visit to the region) easily puts our overall impact into the hundreds of thousands of dollars.

The impression we make goes far beyond our customers. Through our own marketing investment as well as the interest of various media properties, we have been featured in online videos that have been viewed literally tens of millions of times (see Appendix 2 - RRC Video Reach). As we have successfully extended our marketing reach, we are introducing (or reminding) millions of viewers about the beauty of the Adirondacks and inviting them to come visit.

But for our railbiking excursion, many of our customers would not choose to either come to our region or to explore the Adirondack forest at all, whether due to physical or other disabilities, fitness limitations, inexperience in the outdoors, family commitments, or the availability of other, more common outdoor activities (i.e., hiking, camping, rafting, etc.) closer to their homes.

Given that our enterprise and all its associated benefits for the local community and the state of New York depend on the continued existence of the Line, we disagree with NYDEC's contention that the public interest favors abandonment (Filing, pg. 13) because (A) "abandonment will advance New York's longstanding conservation objectives" and (B) "abandonment will not adversely impact rural or community development."

Adverse Abandonment will **not** advance New York's longstanding conservation objectives

RRC's operation is organized around respect for, and a desire to share, the experience of the Adirondack wilderness with everyone in a unique and low impact manner. Riding with RRC does not require specialized equipment, training, or a burdensome time commitment. Our customers are an exceptionally diverse group of people, ranging in age from 4 weeks to 94 years old and bringing a wide range of fitness and ability levels. In under three hours, they are able to explore a 3.5 mile stretch of the Hudson River and adjacent forest.

To the extent that abandonment of the Line endangers the ongoing viability of RRC, Adverse Abandonment works against New York's conservation objectives by potentially eliminating a popular, unique and low impact manner for people from all over the world to both (A) experience the physically and spiritually rejuvenating properties of the Adirondacks and (B) develop a first-hand perspective and appreciation for the eco-system services provided by the Adirondacks.

Adverse Abandonment **will** adversely impact rural or community development

As outlined above, RRC's operations have had a substantial positive impact to the immediate local community in and around Johnsburg as well as to the overall region, both through our immediate financial contribution and the multiplier effect of bringing many thousands of new tourists to the region. Adverse abandonment of the Line puts that entire contribution at risk immediately.

We believe our business has had a positive impact on the Adirondacks and we hope to keep contributing to the Adirondacks and the region for a long time. To do that, we need the Line.

Sincerely,

Michael Dupee and Robert Harte
Owners, Revolution Rail Co.

Appendix 1: Founder Biographies

Robert Harte was a Founding Partner & General Manager of Rail Explorers USA before starting Revolution Rail Company.. Additionally, he is a Professor at Champlain College (Burlington VT) in the Creative Media Department and holds both an MA in European Intellectual History from Drew University and a BA in History from the University of Massachusetts at Amherst.

Michael Dupee is a lecturer in the Sustainable Innovation M.B.A. program at the Grossman School of Business at the University of Vermont as well as a founder of Revolution Rail. Prior to founding Revolution Rail Co., he was the senior corporate sustainability executive at the former Keurig Green Mountain (Waterbury VT) and an investment banker at Goldman Sachs & Co. (New York, NY). He holds a J.D. from the Georgetown University Law Center, an M.B.A. from the McDonough School of Business at Georgetown University, an M.A. in Biomimicry from Arizona State University, and a B.A. in History from Boston College.

Appendix 2: RRC Video Reach

In the Know Presents (AOL): 17 M views

<https://www.facebook.com/InTheKnowPresentsAOL/videos/innovative-outdoor-adventure-combines-railroads-and-cycling-into-rail-biking/1821279828174516/>

Country Living Magazine: 10 M views

<https://www.facebook.com/CountryLiving/videos/pedal-along-the-railroad-tracks-through-the-adirondacks/10155236201323248/>

Travel Insider: 5 M views

<https://www.facebook.com/thisisinsidertravel/videos/railroad-bikes-along-the-hudson/1980364342290725/>

Runner's World: 1.4 M views

<https://www.facebook.com/RunnersWorld/videos/you-can-now-pedal-along-the-railroad-tracks-through-the-adirondacks/10155057310571987/>

Esquire: 148k

<https://www.facebook.com/Esquire/videos/pedaling-through-the-adirondacks/10154752207846674/>

A hard copy of the following document has been sent via US Mail on Thursday August 15th to the following Parties of Record:

Party Of Record	Bassinson, D. Scott Three Empire State Plaza Albany, NY 12223-1350 Tel: Fax:	New York State Public Service Commission
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Party Of Record	Darrah, Darren Essex County In The Park Industrial Development Agency P.O. Box 217 Elizabethtown, NY 12932 Tel: (518) 873-9114 Fax: (518) 873-2011	info@essexcountyjda.com Essex County In The Park Industrial Development Agency
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Party Of Record	Delaney, Gerald Adirondack Park Local Government Review Board. 326 Downs Rd Cadyville, NY 12918 Tel: (518) 569-7800 Fax:	Adirondack Park Local Government Review Board.
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Party Of Record	Deloria, Robin T. Town Of Newcomb Box 405 Newcomb, NY 12852 Tel: 518-582-3211 Fax:	Town Of Newcomb
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Party Of Record	Heffner, John D. Clark Hill Plc 1001 Pennsylvania Ave., Nw Suite 1300 South Washington, DC 20004 Tel: 202-572-8679 Fax:	jheffner@ClarkHill.com Saratoga And North Creek Railway, Llc
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Party Of Record	Janeway, William C. Adirondack Council P.O. Box D-2 Elizabethtown, NY 12932-0640 Tel: 518.873.2240 Fax:		Adirondack Council
Party Of Record	Kuntz, Iii, William PO BOX 1801 Nantucket Island, MA 02554-1801 Tel: Fax:		William Kuntz Iii Iowa Pacific Rr
Party Of Record	Meindertsma, Donn C. Conner & Winters 1850 M Street Nw, Suite 600 Washington, DC 20036 Tel: (202) 887-5711 Fax:	dmeindertsma@cwlaw.com	United Rail, Inc.
Party Of Record	Michaud, David 118 South Clinton Street, Suite 400 Chicago, IL 60661 Tel: Fax:	MichaudD@IowaPacific.com	Saratoga And North Creek Railway
Party Of Record	Mitchell, Paul J Mitchell Stone Products 15 Mitchell Lane Tupper Lake, NY 12986 Tel: 518-359-7029 Fax:	paul@msprock.com	Mitchell Stone Products, Llc.
Party Of Record	Tallent, Joshua M. The Capitol Office Of The Attorney General Albany, NY 12224-0341 Tel: (518) 776-2456 Fax:	Joshua.Tallent@ag.ny.gov	New York State Department Of Environmental Conservation New York State Office Of The Attorney General Environmental Protection Bureau New York Department Of Environmental Conservation State Of New York Office Of The Attorney General