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September 30, 2019

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: New York State Department of Environmental Conservation – Adverse
Abandonment – Saratoga and North Creek Railway in Town of Johnsbury, NY
STB Docket No. AB 1261

Dear Ms. Brown:

I am writing to express my support for the New York State Department of Environmental Conservation's adverse abandonment application for the 30-mile rail line known as the Sanford Lake Line or the Tahawus Line (the Line), from North Creek to the former Tahawus Mine. I also support the New York State Department of Environmental Conservation's request for interim trail use of the Line. Finally, I support the comments from Revolution Rail Company that its use of the Line for railbiking be taken into consideration by the Surface Transportation Board ("Board").

As a Warren County Supervisor, I am interested in this proceeding because Warren County owns nearly 40 miles miles of railroad from North Creek (located in the Town of Johnsbury, Warren County), south to Corinth (located in Saratoga County). Saratoga and North Creek Railway (SNCR) was the operator of the railroad owned by Warren County, but that contract is no longer in effect. Several months ago, Warren County sought to contract with a new operator, but there is currently no contract in place. One of the bidders interested in operating Warren County's line was OmniTRAX, but it has withdrawn its bid. As you know, OmniTRAX has also discontinued its negotiations with SNCR and the New York State Department of Environmental Conservation regarding its potential purchase of the Line.

Low Past Operations in Warren County and Little to No Future Operations

While Warren County has attempted to pursue viable rail operations, via freight and/or tourist trains, the County has not succeeded in its efforts to have a successful rail operation. There are limited opportunities for movement of freight across Warren County's line to markets in other areas of New York or elsewhere in the country. Only a couple of businesses have operations that may utilize rail transportation, and those businesses are currently transporting by truck. The decision to transport by truck may be due to the relatively high cost of rail transportation, the relatively small volume of material/product to be moved, the need for delivery faster than rail transportation can provide, or other reasons (including that there has not been a freight operator on the Warren County line). Thus, it is unlikely that freight operations will proceed in the future.

In addition, prior research on the Warren County rail line, and other similar short line rail lines, indicates that a viable freight transportation operation is necessary to support tourist train activities. According to a 2002 study, tourist "railroad operations must generate sufficient revenue to cover the costs of operating the railroad and, most important, maintaining the rail bed. p. VI-4, Northern Hudson Inter-Municipal Redevelopment Strategy Implementing the First Wilderness Experience, 2002. Here, there is no revenue to the County from freight train operations. Therefore, it is unlikely that a tourist train operation could succeed due to numerous obstacles facing Warren County's use of the line for tourist trains, such as the remoteness of the rail road, stiff tourist competition in this region, and the seasonal nature of tourism in this region.

A Multiuse Trail Would Benefit the Public

In contrast to freight transportation, the Warren County railroad corridor could be converted to a multiuse trail to transport people by foot, bicycle, snowmobile, and rail bike. This multiuse trail could extend from one end of Saratoga County to the midst of the high peaks in the Adirondacks by extending the multiuse trail along the Line. This has the potential to be a successful outdoor adventure experience for tourists, and improve the quality of life for residents. The Adirondack Rail Trail website contains a description of the benefits of that multiuse trail that could apply equally to a multiuse trail through Warren County and north along the Line:

“Ideal for many uses, such as bicycling, running, walking, and wheelchair use, rail-trails are increasingly popular as recreation and transportation corridors. In this case, the Adirondack Rail Trail also provides for greatly improved snowmobiling and the attendant economic benefits. Rail-trails create healthier places for healthier people. They serve as wildlife conservation and historical preservation corridors, stimulate local economies by increasing tourism and fostering local business, offer safe and accessible routes for work and school commuting, and promote active lifestyles for all ages and levels of physical ability.” www.adirondackrailtrail.org/about-us

The popularity of rail trails stems from their flatness, the absence of vehicle traffic, and relatively low operating costs. A successful example of a rail trail is the Warren County Bikeway, which was converted from an abandoned rail line. The Warren County Bikeway between Glens Falls and Lake George, opened in 1979, was the first rail trail in New York. Besides the Warren County Bikeway, there are numerous examples of successful multiuse trails that have been converted from former railroad beds.

The benefits of a multiuse trail include increased quality of life, and increased opportunities to use the line for public recreation, including walking, biking and snowmobiling. “[T]hese activities reduce health care costs and vehicular traffic, can provide a healthy activity for families and children, and can provide an important component to the local economy in terms of tourism. In terms of the environment, biking and walking can be an effective way to reduce dependence on the automobile, and subsequently reduce carbon emissions.” AGFTC Regional Bicycle/Pedestrian Plan, p. 2; The Business of Trails: A Compilation of Economic Benefits, p. 13.

Grant the Adverse Abandonment and Trail Use of the Line

I respectfully request that the Board take these comments about Warren County's railroad corridor, and its connection to the Line, into consideration, that the Board grant the New York State Department of Environmental Conservation's adverse abandonment application for the Line, and that the Board grant the request for interim trail use of the Line. Thank you for your time and the Board's careful deliberation in this matter.

Sincerely,

/s/ Claudia K. Braymer

Claudia K. Braymer

SURFACE TRANSPORTATION BOARD

In the Matter of

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL
CONSERVATION--ADVERSE ABANDONMENT--SARATOGA AND
NORTH CREEK RAILWAY IN TOWN OF JOHNSBURG, N.Y.**

AFFIRMATION OF SERVICE

STB. AB-1261

Claudia K. Braymer, being an attorney duly admitted to practice in the courts of the State of New York, hereby affirms under the penalties of perjury that on October 1, 2019, I served a hard copy of my letter dated September 30, 2019 by first class mail to the following:

Party Of Record:	Bassinson, D. Scott Three Empire State Plaza Albany, NY 12223-1350
Party Of Record:	Berkman, Thomas S. New York State Department Of Environmental Conservation 625 Broadway, 14Th Floor Albany, NY 12233-1010
Party Of Record:	Darrah, Darren Essex County In The Park Industrial Development Agency P.O. Box 217 Elizabethtown, NY 12932
Party Of Record:	Delaney, Gerald Adirondack Park Local Government Review Board. 326 Downs Rd Cadyville, NY 12918
Party Of Record:	Deloria, Robin T. Town Of Newcomb Box 405 Newcomb, NY 12852
Party Of Record:	Dupee, Micheal Revolution Rail Company PO Box 202 North Creek, NY 12853
Party Of Record:	Heffner, John D. Clark Hill Plc 1001 Pennsylvania Ave., Nw Suite 1300 South Washington, DC 20004
Party Of Record:	Janeway, William C. Adirondack Council P.O. Box D-2 Elizabethtown, NY 12932-0640
Party Of Record:	Kuntz, Iii, William PO BOX 1801 Nantucket Island, MA 02554-1801

Party Of Record: Meindertsma, Donn C.
Conner & Winters
1850 M Street Nw, Suite 600
Washington, DC 20036

Party Of Record: Michaud, David
118 South Clinton Street, Suite 400
Chicago, IL 60661

Party Of Record: Mitchell, Paul J
Mitchell Stone Products
15 Mitchell Lane
Tupper Lake, NY 12986

Party Of Record: Potter, Steven
North Country Logisitics Solutions, Llc
64 Talbot Way
Long Lake, NY 12847

Party Of Record: Rudolph, Pipich Iii
2669 Glenny Ln.
West Mifflin, PA 15122-15122

Party Of Record: Tallent, Joshua M.
The Capitol Office Of The Attorney General
Albany, NY 12224-0341

Party Of Record: Taylor, Susan L.
New York State Office Of The Attorney General Environmental Protection Bureau
The Capitol Office Of The Attorney General
Albany, NY 12224-0341

Member Of Congress: Schumer, Honorable Charles E
United States Senate
Washington, DC 20510

Non-Party: Bachor, Ms. Susan
Delaware Tribe Of Indians
PO BOX 64
Pocono Lake, PA 18347

Non-Party: Gitchell, Ms. Amy
Upstate Regulatory Field Office U.S. Army Corps Of Engineers, Attn: Cenan-Op-Ru
1 Buffington Street, Building 10, 3Rd Floor North
Watervliet, NY 12189-4000

Non-Party: Hartley, Bonney
Stockbridge Munsee Community, Wisconsin
65 1St Street
Troy, NY 12180

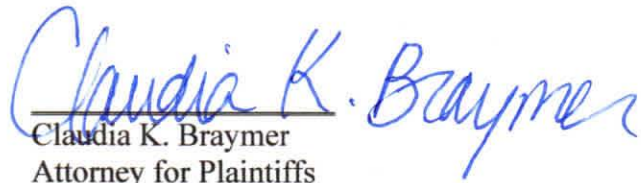
Non-Party: Mackey, Douglas
New York State Historic Preservation Office Peebles Island Resource Center
P.O. Box 189
Waterford, NY 12188-0189

Non-Party: Printup, Mr. Arnold
Saint Regis Mohawk Tribe
412 State Route 37
Akwesance, NY 13655

Non-Party: U.S. Environmental Protection Agency
E.P.A. Region 2 Ted Weiss Federal Building
290 Broadway
New York, NY 10007-1866

Non-Party: U.S. Fish And Wildlife Service
3817 Luker Road
Cortland, NY 13045-1330

Dated: October 1, 2019
Glens Falls, New York



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