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Adirondack Park Agency

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VIA ELECTRONIC MAIL

To Whom It May Concern:

I am writing to **oppose** the proposed amendment (“the Amendment”) to the 1996 Unit Management Plan (“the UMP”) for the Remsen Lake Placid Travel Corridor (“the Corridor”) which would create an “Alternative 7” that would involve the removal of railroad tracks between Tupper Lake and Lake Placid.

I am a lifelong hiker and frequent visitor to the Adirondack Park. My family goes back many generations as both residents of and visitors to the Adirondacks, and the Adirondack Park is one of my favorite places in the world. Professionally, I am a senior executive at a major railroad equipment leasing company, and though I write this letter strictly as a private citizen, I am well-qualified to opine on matters relating to rail infrastructure and railroad economics.

I oppose the removal of **any** railroad tracks within the Corridor, and I believe that the State of New York should not only retain the tracks throughout the entirety of the Corridor, but (i) upgrade those tracks, (ii) initiate year-round, regularly scheduled daily passenger rail service between Lake Placid, Saranac Lake, Tupper Lake, and downstate cities, and (iii) initiate common carrier freight rail service in the Corridor.

The Adirondack Park Agency (“APA”) is charged with the responsibility to “develop long-range land use plans for both public and private lands within the Park” (APA website). The most important two words in this statement of responsibility are “**long range**”. It is in this context that the APA must categorically **reject** any rail removal. No one can know what the coming years and decades will bring for the Adirondack Park, but we can know with certainty that when a rail line is removed, it is lost **forever**. Some will argue that the creation of a trail preserves the future possibility of rail restoration, but decades of rail-trail experience throughout the country shows that this is rarely, if ever, the case.

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Demographics are changing; millennials own fewer automobiles, and people are living longer and requiring mobility solutions that don't rely on private automobiles. Someday soon, it may well be that a large number of potential visitors to the Park are unable to visit because current transportation infrastructure doesn't support their needs. By preserving the rail line in the Corridor all the way to Lake Placid, the option to restore intercity passenger service to the High Peaks region is preserved to better serve a traveling public with diverse needs.

Another long-range reason to retain the rail line is the often-discussed possibility of returning the Olympics to Lake Placid. Route 73 and the SLK airport are hardly the kind of transportation infrastructure that would support a modern Olympic event. But with a relatively modest investment, the rail line in the Corridor could be upgraded to provide direct connectivity to downstate cities and airports, as well as to ferry visitors locally from hotels in Saranac Lake and Tupper Lake to Olympic venues in Lake Placid.

The bottom line is that the APA is charged with long-range planning for the Adirondack Park, and it is **not** in the long-range interests of the Park to see the rail line in the Corridor removed or truncated. No one can know what the future will bring, and so preserving the option value of an intact rail corridor from Utica to Lake Placid is the right long-range policy.

In addition to the above comments, which I have tailored specifically to the APA, I also want to reiterate for the APA certain points that I have made to the DEC and DOT in two letters over the past year. A condensed summary of these points is below:

1. It is important **not** to evaluate the rail line in the Corridor in its current state, but rather under the assumption that it will be properly upgraded and be used to its full potential as a rail line, including (eventually) common carrier freight service and scheduled intercity rail passenger service. Those who support rail removal make a false comparison between a well-subsidized trail and an underfunded rail line, which is misleading.
2. A fully funded and well-operated rail line is a far bigger source of economic development than a trail. The opportunity to bring staple goods into the Adirondacks by rail using a modern transloading station could reduce wear and tear on roads and lower the delivered cost of lumber, flour, propane, heating oil, and other commodities on which Adirondack residents rely. And the connectivity associated with intercity rail passenger service could boost the economic impact of tourism substantially.
3. Once lost, a rail line will never be restored, even if it is nominally rail-banked.
4. The scrap value of the existing track, net of recovery costs, will not pay for construction of a trail. **As of December 2015, the net scrap value of the rails is negative. Steel scrap pricing has fallen to the point where rail removal will cost more than the sale price of the material.** Recall that even when scrap pricing was good, the scrap proceeds of the rails were insufficient to pay for a trail; today, they would contribute **nothing**.

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5. A rail line represents a greater public good than a trail, especially in a region that has many other recreational trails but has very little in the way of transportation infrastructure. In an era when many are concerned with rising income inequality, for the state to subsidize the conversion of a rail line which, even in its current state, can be enjoyed at low cost by anyone, to a trail accessible only to those with the financial wherewithal to engage in expensive sports like snowmobiling, does not make good public policy, especially when so many other recreational trails already exist in the Adirondacks. In contrast, a shared-use corridor in which a rail line and a trail **coexist in parallel** allows for efficient public transportation side-by-side with recreation. Moreover, even a rail-only use for the Corridor offers greater public benefit than a trail, given the plethora of other existing trail options in the Adirondacks. Either way, one has to ask why an area that is already so rich in trails as the Adirondacks would consider it in the public interest to permanently tear out its last remaining rail line in favor of yet another trail.
6. A rail line and a trail **can** safely and efficiently coexist in a transportation corridor. As an example, in the Blackstone Valley of Rhode Island a beautiful and well-used modern cycling trail shares a wide right-of-way with 4 to 6 daily freight trains. There is no reason that the Adirondacks cannot emulate this “best of both worlds” approach. Anti-rail forces have noted that there are certain specific portions of the Corridor where side-by-side construction of a trail and a rail line would be challenging. While this is true, that is hardly a reason to justify the removal of the rail line. Instead, alternative trail routings must be considered in those locations. It is **absurd** to argue that because of a small number of geographic obstacles to trail construction, a valuable and irreplaceable rail line should be permanently removed.
7. Rail represents a carbon-reducing, environmentally-friendly approach to transportation, and it would be a failure of environmental stewardship not to maximize the use of rail transport for freight and passengers in the Adirondacks. Lake Placid is the largest tourist destination in the High Peaks region, and the revitalization of Saranac Lake offers the promise that it too will become a destination of choice. As visitors flock to these picturesque villages, does the State want them to do so in inefficient single vehicles, or in a fuel-efficient, environmentally friendly train? And for freight service, the efficiencies are even greater. Railcars offer a 3- or 4-to-1 advantage over trucks in payload, and an even greater advantage in fuel economy per ton-mile (railroads move over 400 ton-miles of freight on a single gallon of diesel fuel, something trucks can never achieve). If the State restores scheduled freight and passenger service to the High Peaks region and the rest of the Corridor, these environmental benefits will help keep the Adirondacks beautiful for generations.
8. Truncation of the rail line at Tupper Lake is **not** the answer. Rail lines that fail to reach their logical commercial endpoints are not economically viable, and North America is littered with abandoned branch lines that back up this assertion. Alternative 7 attempts to “split the baby” and convert the Corridor to trail use east of Tupper Lake while retaining rail to the west. This is a terrible option for three reasons: first, if the State wants the rail line in the Corridor to be

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successful, cutting trains off from the heart of Adirondack tourism in Lake Placid makes no sense. Second, if the State is serious about developing tourism in Saranac Lake and Tupper Lake, an improved train from Lake Placid would seem to be a great funnel for tourists into these less developed areas. Thirdly, and most importantly, if the Corridor and the rail line are to be more than just a tourist attraction, and instead are to be a legitimate source of intercity freight and passenger transportation, then truncating the line runs completely counter to good transportation policy. Even if the State does not intend to invest today to upgrade the rail line, by removing its eastern end, it **permanently and irrevocably** gives up that option. This would be disastrous public policy.

9. Saying the 1996 UMP has “failed”, and thus the rail line in the Corridor should be removed, makes no sense considering that an insufficient amount of public money has been spent to allow the Corridor to succeed as a rail line. The rail line in the Corridor can only be properly evaluated in the context of adequate public funding. Rail service is capital-intensive. The State already enjoys a strong relationship with Amtrak, providing substantial subsidies for Amtrak service throughout the State. In addition, the State subsidizes MTA Long Island Railroad, MTA Metro-North Railroad, MTA New York City Transit, and MTA Staten Island Railroad. The State has **not**, however invested anything close to a sufficient amount of subsidy to properly rehabilitate and operate the rail line in the Corridor for through passenger rail service, which is why the only rail service that exists in the Corridor is a tourist train. The State should invest sufficient subsidy to bring the rail line in the Corridor up to at least FRA Class III (59MPH) standards for its entire length, which would allow for competitive travel times to downstate, and the State should contract with Amtrak to extend one or more daily “Empire Service” round trips between New York City and Albany to Lake Placid. While this will be substantially more capital intensive than the State’s modest investment in the Corridor to date, it will be consistent with the State’s overall progressive approach to passenger rail and will provide a true mobility benefit to residents of and visitors to the Adirondacks.

In addition to the above 9 points, the following 6 points are offered in response to the fact sheet issued by the NYS DEC and DOT titled “What We Learned from the 2013 Review”, (which I will refer to as the “Fact Sheet”), and the April 2015 draft economic report from Camoin Associates (which I will refer to as the “Economic Study”).

1. The Fact Sheet makes it clear that trail construction costs \$3.1MM more than rail rehabilitation between Tupper and Lake Placid. The Economic Study shows that an all-rail approach to the Corridor generates 25 new jobs and results in \$974K in net new earnings to New York State. The Economic Study shows that Alternative 7 also generates 25 new jobs, and that it results in \$996K in net new earnings to New York State. So effectively, **if Alternative 7 is adopted, the State needs to spend \$3.1MM in additional funds to make \$22,000 in net new annual earnings and create no new jobs.** That is insane---the payback period on the State’s investment is a whopping

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141 years! And that doesn't even factor in the fact that by preserving rail between Tupper Lake and Lake Placid, the option value to add scheduled intercity passenger rail service and common carrier intercity freight rail service is retained. That option value is worth far more than \$22,000/year, and thus it is conclusively obvious that converting any part of the Corridor from rail to trail is a **bad economic deal** for New York State.

2. The Fact Sheet notes that in 2012 the North Country Regional Economic Development Plan Progress Report specifically identified "preservation and rehabilitation of Remsen-Lake Placid Rail corridor as a Key Economic Development Strategy". This underscores the fact that independent economic analysis supports the best outcome for the Corridor as being one with enhanced rail over its entire length.
3. The Economic Study failed to contemplate the rehabilitation of the rail line in the Corridor in the context of full restoration of intercity passenger and freight service, which has to be considered as a viable option. Instead the Economic Study considered the Corridor only as a recreational asset, and not, as it should be viewed, as a **transportation asset**. As a result, the Economic Study must be viewed as incomplete.
4. The Fact Sheet notes 71,354 trips on what all sides agree is an underfunded railroad operation saddled with a month-to-month lease and underinvestment from the State. This represents an **average** of around 400 riders per day over the railroad's operating season. In contrast, snowmobile usage **peaks** at between 465 and 610 riders per the fact sheet, with the average count certainly far lower. An example of a well-funded tourist railroad in Ohio with a long-term operating plan is cited by the Fact Sheet as having 210,000 annual riders, which would represent daily ridership that far exceeds even the best snowmobile use tallies. So even considering that the railroad is underfunded and subject to a disadvantaged lease, it is competitive with snowmobiling as a tourism generator, and with proper funding it could far outstrip snowmobiling. Moreover, there is **no evidence** cited that snowmobilers would not simply find alternative trails and continue coming to the Adirondacks; according to the Economic Study there are nearly 1,700 miles of other snowmobile trails in the Adirondacks. So by destroying the rail line between Tupper Lake and Lake Placid, Alternative 7 eliminates all rail ridership on that end of the line, while quite possibly generating **no net gain** in snowmobile traffic.
5. We cannot overlook the economic and environmental justice aspect of the argument to retain the rail line for the entirety of the Corridor. The anti-rail interests are backed by certain wealthy landowners whose motivation is to get trains away from their property, and this is clearly against the public interest. Even if we accept that the interest of the snowmobiling community constitutes a portion of the "public interest", we must acknowledge that snowmobiling is an expensive, noisy, and environmentally damaging pursuit. In contrast, rail offers an environmentally sound, affordable, accessible-to-all (including the elderly and people with disabilities) use of the Corridor. If the State allows the Amendment to pass and the tracks to be removed between Tupper Lake and Lake Placid, then the State is saying that access to High

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Peaks region is to be limited to those who can afford a car or a snowmobile and who are physically able to transport themselves, and the State is further saying that the property interests of a few wealthy landowners trumps the public good. In contrast, if the State retains and upgrades the entire rail line from Utica to Lake Placid, people of all physical abilities and economic circumstances can enjoy the entire High Peaks region.

6. There is simply no basis for the assertion that rail and trail cannot coexist side-by-side in the same Corridor. I do not deny that there are specific issues that have to be addressed at specific locations, particularly where the corridor narrows and wetlands are involved. However, even in the most challenging parts of the Corridor such as near Ray Brook, there are alternative routes for a trail that would allow a rail line and a trail to coexist, as have been identified by groups such as TRAC (the Trails and Rails Action Committee). Taking the draconian step of removing the rail line because these alternatives seem "too difficult" is itself an assault on the environment, since it removes the opportunity for future environmentally sound rail transport to and from the High Peaks region.

In summary, there are numerous reasons why the Amendment is a bad choice for the Adirondack Park and for all of us who love and regularly visit the Adirondacks. Alternative 7 is a bad economic deal, it reduces economic and environmental justice, it overlooks the fact that snowmobilers already have numerous alternatives, and it removes a key potential driver of future economic growth in the High Peaks. The Amendment should **not** be adopted, Alternative 7 should **not** be pursued, and instead the APA should take the long-range approach and support the retention and improvement of the entire rail line from Utica and Remsen all the way to Lake Placid.

Sincerely,



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