

PUBLIC/REDACTED VERSION
SURFACE TRANSPORTATION BOARD

ENTERED
Office of Chief Counsel
December 10, 2025
Part of
Public Record

DOCKET NO. AB—1344X

**COLORADO PACIFIC RIO GRANDE RAILROAD LLC—ABANDONMENT
EXEMPTION—IN RIO GRANDE COUNTY, COLO.**

SUPPLEMENTAL COMMENTS OF CONCERNED CITIZENS OF SAN LUIS VALLEY

The Concerned Citizens of San Luis Valley filed Comments in Opposition to the Offer of Financial Assistance (“OFA”) of Matthew Hayduk (“Hayduk”) to purchase a 26.55-mile line segment (the “Line”) from the Colorado Pacific Rio Grande Railroad LLC (“CXRG”). Concerned Citizens demonstrated that the OFA does not meet the requirements of 49 CFR § 1152.27 for, among other reasons, failure to show any need for the restoration of rail freight service on the Line and no local community support. Concerned Citizens qualified their Opposition because Hayduk placed all of the claimed shipper support in Exhibit T to the OFA, which was classified as “Confidential.” Concerned Citizens indicated they would supplement their Comments once they were able to review Confidential Exhibit T. In addition to Exhibit T, Hayduk more recently submitted Exhibit A to the Hayduk Joint Reply to the CXRG Motion to Withdraw its Notice of Exemption as evidence of a need for continued rail service on the Line. Exhibit A includes the Confidential Verified Statement of Matthew J. Hayduk, the would be substitute Offeror, and a power point presentation Hayduk made to the Rio Grande County Commissioners on September 24, 2025.¹ Hayduk V.S. Para. 10. The Hayduk V.S. was marked as “Confidential.” Some presentations in Exhibit A are marked “Confidential” or “Highly

¹ Exhibit A should have been included with the Hayduk OFA, since the information in it was known to Hayduk when he filed his OFA on November 17, 2025.

Confidential.” Having signed the Protective Order, Counsel for Concerned Citizens has now been able to review both Confidential and Highly Confidential materials.

Neither Exhibit T nor Exhibit A satisfy the factors in § 1152.27(c)(1)(iv)(E) for continued need for rail service: “Evidence of demonstrable commercial need for service (as reflected by support from shippers or receivers on the line or other evidence of an immediate and significant need”) and “evidence of community support” The OFA should be rejected on this basis alone although the Concerned Citizens showed in their Comments in Opposition many other flaws with the OFA.

A review of Exhibits T and A show that the only shipper who expressed any interest in rail shipment over the Line is the owner of the GE B30-7 Locomotive for a one time move. No other shipper or receiver indicated any interest if they responded at all to Hayduk’s requests for support. All of the other supposed evidence of shipper interest comes from generalized projections and suppositions by Hayduk based on his predictions. The Board has found that such “generalized and speculative” evidence does not satisfy the Rule’s requirement for “detailed” “specific and concrete evidence.”² Hayduk apparently relies instead on his stranded segment legal theory to justify his OFA. Concerned Citizens also stated that they would follow up with official confirmation that the Rio Grande County Commissioners withdrew their support for the Hayduk OFA. We present this confirmation next in Part I of these Supplemental Comments.

Because these Supplemental Comments discuss information in exhibits marked Confidential and Highly Confidential by Hayduk, the Concerned Citizens are filing a Public and Non-Public

² *R.J. Corman Railroad Property, LLC—Abandonment Exemption—In Scott, Campbell, and Anderson Counties, TN*, Docket No. AB 1296X, slip op. at 5 (served Sept. 23, 2020).

version of their Supplemental Comments.³ This is the public version. None of the Exhibits to these Supplemental Comments contain Confidential or Highly Confidential Material.

I. No Evidence for Local Community Support

Hayduk claimed community support based on a single letter from the Rio Grande County Commissioners, which was Exhibit R to the OFA. OFA at Para. 114. The Concerned Citizens learned that the Commissioners subsequently voted to withdraw their letter of support. The Minutes of the meeting where this vote was taken have not yet been posted on the Rio Grande County website. Rio Grande County Commissioner Glover in the meantime confirmed in a November 29, 2025 e-mail to Counsel for Concerned Citizens that the Commissioners had in fact withdrawn their letter of support. *See* Exhibit No. 10. The Hayduks' Joint Reply also confirms that the letter was "rescinded" by the Commissioners. Reply at 6 n.2 ("Letter rescinded; Hayduk notified by email November 18 4:38 pm . . ."). Hayduk still relies on this withdrawn letter as supposed local support for his OFA. Reply at 6. While the Commissioners may oppose abandonment, that does not translate into support for the Hayduk OFA. They clearly have misgivings about the Hayduk OFA. In any event, as explained in Concerned Citizens' Comments (page 13), the letter carries no weight under Board precedent because it is too general and does not contain any evidence of specific shipper interest.

II. Confidential Exhibit T to the OFA

The only statement in the OFA about shipper need for restored freight service is a single sentence in Paragraph 115 on page 21: "Shippers and potential shippers have demonstrated a need and desire for rail service on the line. *See* Ex. T." Counsel for Concerned Citizens has

³ Concerned Citizens' Exhibits are numbered consecutively. The Exhibits to our Comments were 1-9. The Exhibits for these Supplemental Comments are 10-17.

now been able to review Confidential Exhibit T. Exhibit T consists of a two- page Verified Statement of [REDACTED] and an e-mail [REDACTED] to Matthew Hayduk. Except for the one time move of the locomotive, neither show a need for rail freight service over the Line, now or in the future, as we next explain.

A. [REDACTED] Verified Statement

According to his Verified Statement, [REDACTED] is an owner of [REDACTED].⁴ and is in the business of [REDACTED] and, according to the Hayduk Reply, is the “new” owner of the General Electric B30-7 diesel locomotive about which much has been written in this proceeding. This locomotive has been parked dead for as long as 20 years on track of the Denver & Rio Grande Railway Historical Foundation (“D&RGHF”) in South Fork, CO.⁵ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4 [REDACTED]

⁵ Concerned Citizens Exhibit No. 12 is a map of San Luis Valley and environs showing the locations and relationships of various places mentioned in these Supplemental Comments and Hayduk Exhibits T and A, including the CXRG, the CXRG Line that is the subject of the Hayduk OFA, the Creede Branch of the Denver & Rio Grande Railway Historical Foundation, South Fork, where the out of service locomotive is located, and Wolf Creek Pass, which is where the Wolf Creek ski area is located discussed *infra* in Part III.B.

Moreover, [REDACTED] and Hayduk are wrong that “RAIL movement of the locomotive is the ONLY FEASIBLE way the locomotive can move.” Hayduk Reply at 6. Being in the business of rehabilitating, leasing, and sale of second hand diesel locomotives, [REDACTED] (and Hayduk) should know better that locomotives can and are transported by truck. We attach photos of diesel locomotives and other rail equipment being transported by specialized trucks and trailers in Exhibit Nos. 13 and 14. For example, Exhibit No. 13 (“How To Transport Locomotives Cross-Country”) is from Bear Down Logistics, which specializes in heavy loads, including cross country moves of locomotives. Bear Down has two locations in Colorado according to its website. It is possible to truck the B30-7 locomotive to California. Or [REDACTED] could arrange to have the locomotive trucked about 30 miles east from South Fork, CO to Monte Vista, CO, or another point on the CXRG where it could be transferred to rail transport by CXRG to interchange with the Union Pacific or BNSF at Walsenburg, CO. There is no record support whatsoever for the statement that rail is the only “FEASIBLE” way to move the B30-7 locomotive. Moreover, it is inherently unbelievable that [REDACTED] would purchase this locomotive without having different transportation options for moving it to California given the uncertain future for the Line.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Neither he nor Hayduk ever say,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

These claims of current and future business deserve no credence because they are so generalized as to be meaningless in evaluating a need for continued rail service. They do not satisfy the Board's requirement for concrete and specific evidence of immediate commercial need for rail freight service. Interestingly, Hayduk does not mention or rely on [REDACTED] unexplained claims of [REDACTED]

B. E-mail With [REDACTED]

The only other supposed indicia of shipper support in Exhibit T is an e-mail from [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

III. Hayduk Confidential Verified Statement and Exhibit A to Joint Reply

Perhaps realizing that the evidence in Exhibit T of only one shipper needing rail for a one time movement of a locomotive was facially insufficient, Hayduk tries to show additional shipper support in Exhibit A to their Reply, a Confidential Verified Statement of Matthew Hayduk and various presentations. As explained in the Reply and Hayduk V.S., some of the presentations in Exhibit A were presentations made by Hayduk to the Rio Grande County

Commissioners on September 24, 2025 to gain their support. These new materials again show only the one prospective shipper, [REDACTED]. The rest of the materials are nothing more than generalized speculation and predictions of Hayduk.

[REDACTED]
[REDACTED]
[REDACTED]. In the absence of statements of support from shippers or receivers on the Line, the Hayduk Verified Statement describes what he sees as potential need for rail freight service. He mentions the possibility of [REDACTED]
[REDACTED] and the movement of the one dead locomotive from South Fork. We next look at each of these supposed future sources of rail freight service.

A. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Wolf Creek ski resort is reached by US highway 160. The nearest rail line is South Fork at the western end of the Line, about 18 miles to the east from Wolf Creek Pass. *See* Exhibit No. 12. A rich Texan, Red McCombs, acquired land near the ski resort in 1986. His plan was to build a residential development adjacent to the ski resort, the Village at Wolf Creek. Fierce opposition arose to his planned development. Nearly 40 years later, his development has not moved forward. There is uncertainty if and when this development will ever be built. *See* Exhibit No. 16.

Even if the Village at Wolf Creek development were to move forward some day, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Again, we do not know.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

So, even if there were a demand for rail [REDACTED] service, which Hayduk has not shown, a convenient rail option remains even if the Line is abandoned.

C. [REDACTED] B30-7 Locomotive

Enough has been said about [REDACTED] B30-7 General Electric locomotive, first in Exhibit T and now in Exhibit A. As discussed, a one time movement of one locomotive obviously does not show a need for rail service on the Line. Also, as explained, this locomotive can be transported by truck to California or by truck to a point on CXRG for further shipment by rail.

IV. Stranded Segment and Public Interest

A review of Exhibit T and Exhibit A shows that Hayduk has only produced one potential shipper, [REDACTED]. That's it. The truth is there is no present or future demand for rail freight

⁶ See website of Colorado Pacific Rio Grande Railroad LLC, csrgrr.com.

service on this Line. That is why Hayduk has to make stuff up in Exhibit A to try and meet the requirements of 49 CFR § 1152.27. But the Board has found that these kinds of speculations and projections do not show a need for continued rail service if not supported by “concrete evidence” from actual shippers or receivers. See, e.g., *R.J. Corman Railroad Property, LLC—Abandonment Exemption—In Scott, Campbell, and Anderson Counties, TN*, Docket No. AB 1296X, slip op. at 6 (served Sept. 23, 2020).

Since they cannot show a present or future need for rail service, the Hayduks instead fall back on their stranded segment legal argument. According to the Hayduks, if CXRG is allowed to abandon the Line, this will create a stranded segment in the form of the D&RGHF, whose Creede Branch will be cut off from the interstate rail system. Concerned Citizens have addressed the stranded segment argument in their Comments and will not address it again here.⁷ We note though that the D&RGHF’s Creede Branch was already physically cut off from the interstate rail system many years ago, before CXRG allowed removal of the highway crossing in Del Norte, when the Colorado Department of Transportation paved over grade crossings where the Creede Branch crosses Colorado State Highway 149 between South Fork and Creede. See Exhibit No. 17 (photos of removed and paved over crossings).

There is a certain irony that the main support for the Hayduk’s OFA is another misuse of the OFA process by the D&RGHF to acquire the Creede Branch. The Board revised its OFA regulations in 2017 to avoid future abuses of the OFA process as happened with the D&RGHF.

⁷ As previously discussed in the Concerned Citizens Comments, the Board has twice found that the D&RGHF has not shown any possibility for restoration of rail freight service to the Creede Branch. *Denver & Rio Grande Railway Historical Foundation Adverse Abandonment-In Mineral County, CO*, STB Docket No. AB-1014 (served May 23, 2008); *Denver & Rio Grande Railway Historical Foundation—Petition for Declaratory Order*, Docket No. 35496 (served August 18, 2014).

Yet, déjà vu, here we are again with another misuse of the OFA process for the Line, which connects to the D&RGHF.⁸

Hayduk presents a binary choice for the Board: “Ultimately, The STB must decide which entity, CXRG or Hayduk, is most likely to preserve rail service over the Line Segment at issue; and which entity, CXRG or Hayduk, is most likely to act in the Public Interest.” Reply at 17. This is a false choice. The record shows that there is no rail freight business on the Line to preserve and no likelihood that there ever will be. The public interest is in the strict application of the criteria in 49 CFR §1152.27 and Board precedent to prevent abuses of the Board’s OFA process.

Conclusion

Ultimately, the Board looks at the “totality of the circumstances” when evaluating an OFA. The totality of the circumstances require rejection of the Hayduk OFA.

- There are no active shippers or receivers of rail freight on the Line.
- The Line has been out of service for more than a decade.
- The Line is in need of rehabilitation.
- Hayduk has not been able to present any concrete and specific, detailed evidence of a desire for restoration of freight service by shippers.
- We still do not know anything about the Offeror or what Hayduk International LLC are really up to with its repeated OFAs for various line segments.

The Board can moot the Concerned Citizens’ concerns by granting CXRG’s Motion to Withdraw. Otherwise, for the reasons explained in the Concerned Citizens’ Comments in

⁸ All of the potential business that Hayduk projects for the Line in Exhibit A involves [REDACTED]. So, Hayduk wants to use the OFA process to force the CXRG to sell the Line to him for a bargain price so he can compete with CXRG for [REDACTED]. Is that how the OFA process is supposed to work?

Opposition and these Supplemental Comments, however the Board resolves this proceeding, the Hayduk OFA must be rejected.

Respectfully submitted,

/s/Ronald M. Johnson

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(301) 767-5105
rmjohnson@rmjohnsonlaw.com

Dated: December 10 , 2025

CERTIFICATE OF SERVICE

I hereby certify that on this 10 day of December, 2025, a copy of the Public Version of the Supplemental Comments of the Concerned Citizens of San Luis Valley was served on all parties of record in Docket No. AB -1344X electronically and by first class mail.

/s/Ronald M. Johson

Ronald M. Johnson
Counsel for Concerned Citizens of San Luis Valley

**INDEX OF EXHIBITS TO SUPPLEMENTAL
COMMENTS OF CONCERNED CITIZENS OF
SAN LUIS VALLEY**

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17	Photos of crossings of Colorado Highway 149 by Denver & Rio Grande Railway Historical Foundation paved over by CDOT at different locations (photos taken 12/9/25)

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EXHIBIT 10

E-mail from Rio Grande County Commissioner
to Ronald M. Johnson

Re: Hayduk OFA

From: Gene Glover (gglover@riograndecounty.org)

To: rmj5@aol.com

Date: Saturday, November 29, 2025 at 11:55 AM EST

Ron, we voted to rescind our letter of support Thanks.

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EXHIBIT 11

Website of Dieselmotive Company, Inc.

Dieselmotive Company, Inc.

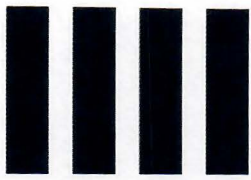


**CUSTOMER
FOCUSED**

We specialize in identifying customer needs, many times before they are known to the customer and then satisfy those needs through superior communication, documentation, and integrity.

**Our
Services**





FIELD SERVICES

Each customer gets our mechanical experience and depth of knowledge and the flexibility to use as much or as little of our expertise as necessary for their individual circumstances. Our knowledge and experience will help us solve your problem quickly and efficiently.



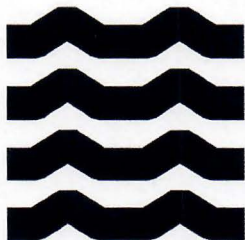
WHEEL PROFILING

We provide on-site wheel turning for your powered locomotive axles. Scroll down see our on-site process.



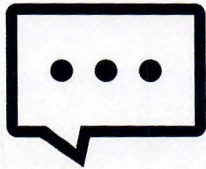
LOCOMOTIVE LEASING

We do short term and long term leases based on customer needs. If we don't have what you need, then we will hook you up with someone who does.



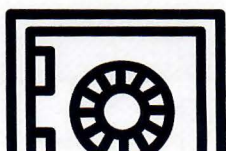
PARTS

Having trouble finding something? Three decades of working and scraping locomotives Dieselmotive has acquired a large inventory of rare and no longer produced locomotive parts.



OTHER SERVICES

Please feel free to discuss your specific needs with us and again, if we don't do it, we will find someone who does with our extensive knowledge base.





The Vault

Click here to access documents that help with keeping a fleet of locomotives running.

GET IN TOUCH

We Provide Locomotive Inspection and Maintenance in California, Nevada, and other locations★

Dieselmotive Company Inc. provides locomotive inspection and maintenance services. We specialize in identifying customer needs, many times before they are known to the customer and then satisfy those needs through superior communication, documentation, and integrity. We are adept problem solvers and creative in our approach to service and maintenance in a standardized and highly regulated environment. Our motto is ...*"keep the customer happy and go home safely."*

Some of the companies that we have worked for include: Amtrak, BNSF Railway, Union Pacific, Coast Rail Services, Enterpro, Lehigh, South West Cement, ITS ConGlobal, Central California Traction Co., Santa Maria Valley Railroad, West isle line, Genesee and Wyoming Railroad Group, The Anderson's, Transit America Services, Herzog, OMNI TRAX, Granite Rock, US Navy, US ARMY, USS POSCO, Pacific Locomotive Association, State of Nevada and more.

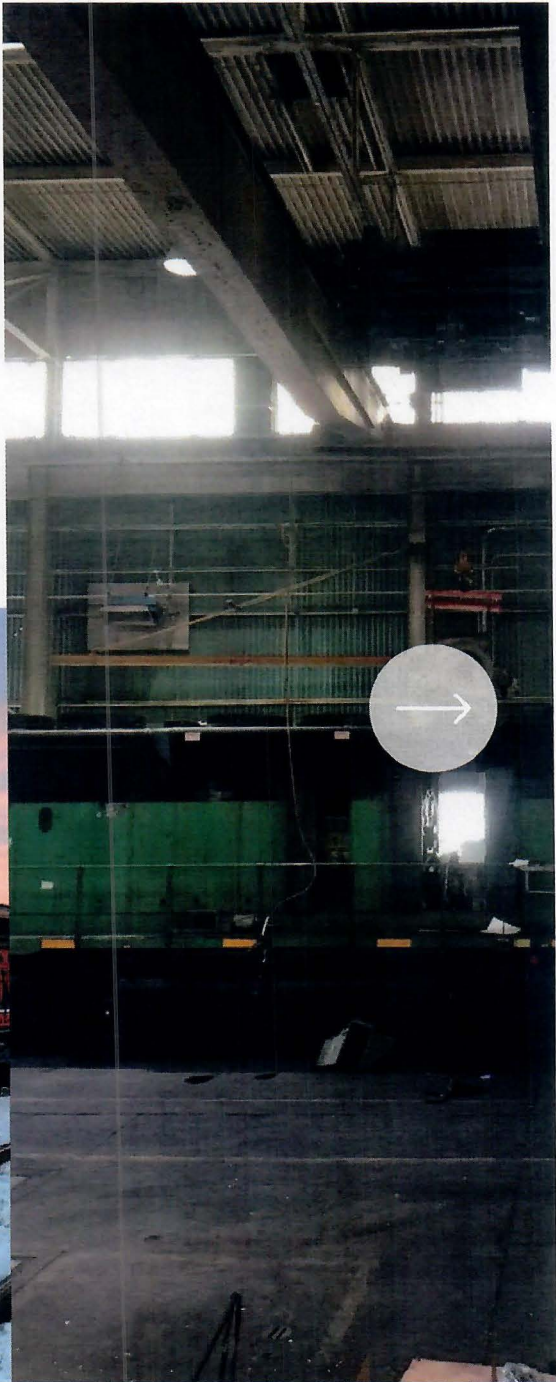
***Note:** Other locations beyond cited States will be considered depending on requirements and scope of work. Feel free to contact us regarding your needs.

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Bill
BUGX 4324



Turbo change on l

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problems
Dieselmotive
finds when
locomotives are
improperly
stored. This
damage is from
not capping
exhaust stacks.

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Dieselmotive Company Inc. is a leading
Northern California locomotive
inspection and service company.

Our Team

MATT MONSON

Founder and President.

Matt spent 10 years working for Westinghouse Air Brake Company where he learned about how the air brake was used in the Railroad industry. While learning at Air Brake, he learned that railroads had many needs and that he could full fill many of those needs on his own. With the permission of Westinghouse Air Brake, Matt set out on his own and started Dieselmotive Company Inc. Fueling his childhood love for the locomotive, Matt started leasing locomotives like the 4347 to the Northwestern Pacific Railroad. Due to customers demand and exceptional Dieselmotive brand service, Matt expanded operations to include locomotive inspection and servicing, on-site wheel turning. Today, Dieselmotive is a leading Northern California inspection and service company known for its dedication, integrity and customer-driven priorities.

Marketing and Research & Development

Jim has a mechanical background that started in airplanes and moved to the docks of Oakland, working on all types of machinery, vehicles, and engines in the marine industry. After retiring, Jim missed the daily hum of machinery and left retirement for the sound of the locomotive. His father retired from the Pennsylvania Railroad so trains were in his blood. He settled in at Dieselmotive and it has been nearly ten years of railroad bliss. Jim's duties are centered on marketing and operations support.





Dieselmotive Team

From Left to Right, the staff at Dieselmotive include, Bill Talkington, Jim Russell, Matt Monson and our customer, Bill Walker.

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Dieselmotive Company, Inc.

DMCBUGX.com

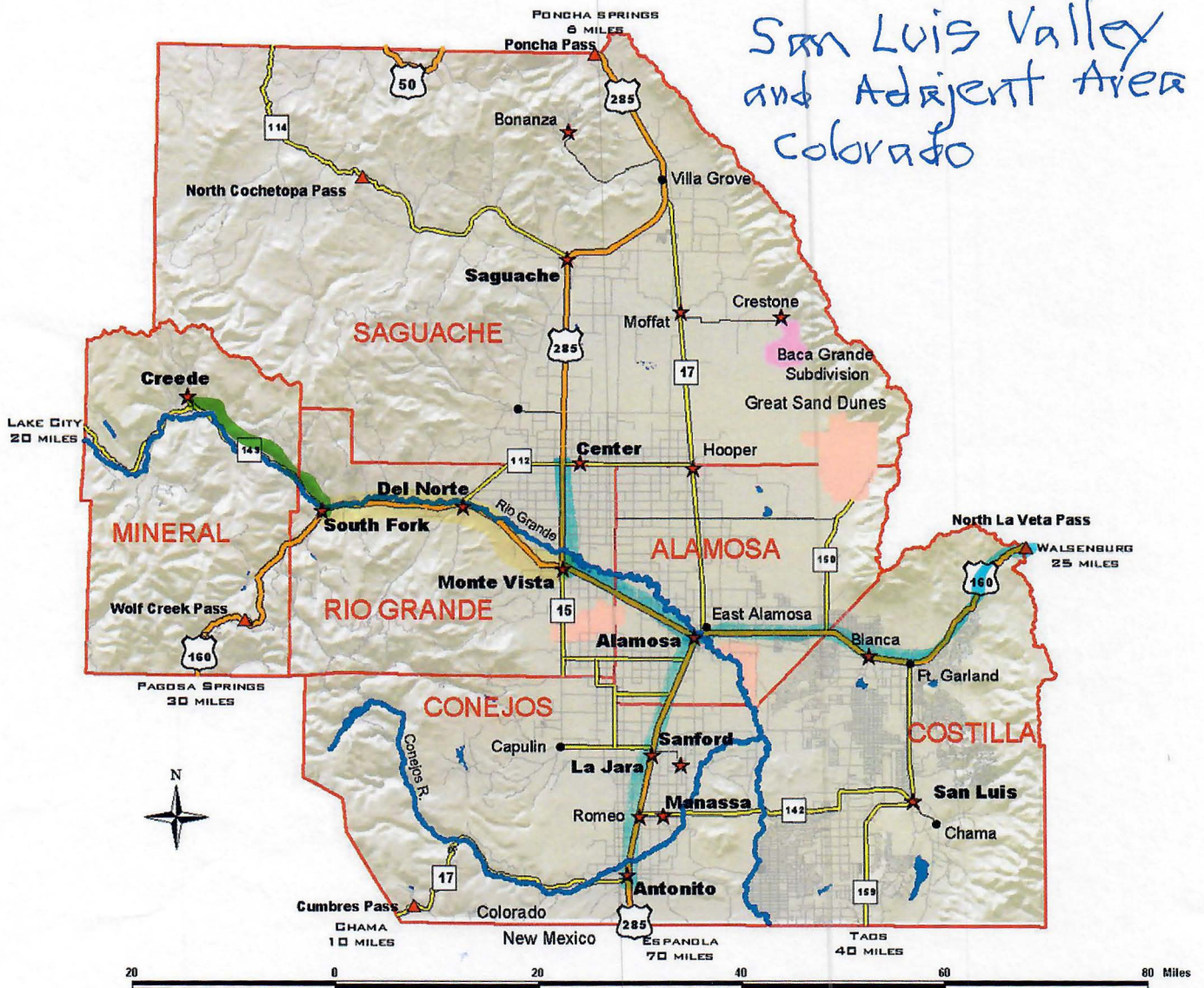
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EXHIBIT 12

Map of San Luis Valley Railroads

San Luis Valley and Adjacent Area Colorado



- Colorado Pacific Rio Grande RR (CXRG) minus line segment proposed for abandonment (interchanges with UP and BNSF at Walsenburg)
- CXRG line segment between South Fork and Monte Vista that is subject of Docket No. AB 1344 X
- Denver & Rio Grande Railroad Historical Foundation (Creede Branch)

Docket No. AB-1344X

EXHIBIT 13

Website of Bear Down Logistics,
“How to Transport Locomotives Cross-Country”

[Heavy Equipment](#)[Heavy Hauling](#)[Locations](#)[Free Quote](#)[Call Now](#)

How to Transport Locomotives Cross-Country

August 4, 2025 by Desmond Clark



Moving a locomotive across the country is a highly complex undertaking that demands specialized planning, equipment, and regulatory compliance. Locomotives weigh between 200,000 and 450,000 pounds, requiring special multi-axle trailers to comply with bridge and road weight limits under **FMCSA** regulations.

A successful move hinges on careful route planning, permits, safety measures, and the expertise of a qualified heavy-haul logistics provider. Let's explore the best practices, cost considerations, and step-by-step processes for transporting locomotives safely and efficiently across the United States.

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**PROUDLY
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The Unique Challenges of Cross-Country Locomotive Transport

Transporting a locomotive isn't like moving regular cargo. Each unit represents significant value, intricate engineering, and sheer size that challenge even the most experienced haulers. Understanding these unique challenges is the first step to planning a successful move.

Size and Weight Constraints

Locomotives typically weigh between 200,000 and 450,000 pounds. This exceeds standard trailer and bridge capacities, requiring multi-axle heavy-haul trailers to distribute the load safely.

Oversize Dimensions

With lengths often exceeding 70 feet and widths beyond 10 feet, locomotives qualify as oversize loads. Height clearances also require careful route surveys to avoid bridges, tunnels, or power lines. According to FHWA and FMCSA regulations, multi-axle heavy-haul trailers are required to distribute the load safely and comply with federal size and weight limits to protect roads and bridges.

Non-Operational Condition

Many locomotives being relocated are not operational, requiring cranes or hydraulic lifts for loading and unloading. Their sheer bulk makes on-site rigging and coordination essential. The **Bureau of Transportation Statistics (BTS)** highlights that inactive units demand sophisticated rigging and site coordination.

Regulatory Complexity

Crossing multiple states means managing a patchwork of

restrictions, all of which must be approved in advance. The FMCSA advises early and thorough multi-state permit applications since approval times can vary widely.

Essential Equipment for Locomotive Transport

Moving locomotives requires more than just a truck and trailer. Specialized equipment ensures the load remains stable, secure, and compliant during long-distance travel.



Heavy-Haul Trailers

Schnabel and Multi-Axle Trailers: These provide the stability and weight distribution necessary for 200-ton loads. **FHWA** notes these are crucial for heavy loads up to and exceeding 200 tons, allowing even weight distribution

Removable Gooseneck (RGN) Trailers: Useful for locomotives under 300,000 pounds, allowing easier drive-on or lift-on loading.

Extendable Flatbeds: Help manage long locomotive frames without overhang.

Rigging and Lifting Systems

Precision cranes and hydraulic jacks are required for safe lifting. Professional rigging crews ensure no structural stress occurs during loading or unloading.

Load Securement Systems

Chains, steel cradles, and reinforced tie-downs are used to immobilize the locomotive. Compliance with Federal Motor Carrier Safety Administration (FMCSA) securement rules is mandatory.

Escort and Support Vehicles

Escort cars, utility trucks, and sometimes law enforcement escorts ensure safe passage on public highways.

Planning the Route for Locomotive Hauling

Route planning is the foundation of a successful cross-country locomotive move. Every mile must be analyzed to avoid costly detours or compliance issues.

Clearance Checks

Using Survey teams use measuring poles and digital mapping tools similar to **route planning best practices for oversized equipment** to verify bridge heights and overhead clearance.

State-Approved Oversize Corridors

Whenever possible, carriers use designated heavy-haul corridors. These routes are built for oversized freight and minimize risk.

Road Condition Assessments

Poorly maintained rural roads or weak bridges can pose dangers for loads of this magnitude. Pre-trip surveys eliminate these risks.

Seasonal Considerations

Winter ice or spring flooding can make certain roads impassable. Seasonal planning reduces the likelihood of weather-related delays.

Regulatory Compliance in Locomotive Transport

Compliance with federal, state, and sometimes local rules is non-negotiable. Locomotive transport must be documented and approved before departure.

Oversize Load Permits

Each state requires specific permits based on dimensions and weight. Multi-state trips require applying for multiple permits, which can take several business days.

Escort Vehicle Regulations

Many states mandate pilot cars for loads exceeding 12 feet in width or 15 feet in height. Some also require police escorts on highways.

Hours-of-Service and Travel Restrictions

Drivers of oversize loads must follow FMCSA hours-of-service regulations. Many states restrict oversize loads to daylight travel and prohibit moves during holidays.

Federal Bridge Law Compliance

Weight must be distributed according to bridge formulas to avoid structural damage. Specialized trailers with multiple axles help achieve compliance.

Cost Factors in Locomotive Transport

The cost of moving a locomotive cross-country depends on multiple factors, each of which must be budgeted for in advance.

Key Cost Drivers

Size and Weight: Larger locomotives require more axles and special trailers.

Permits and Escorts: Multi-state permits and police escorts add thousands in fees.

Rigging and Handling Equipment: Cranes and hydraulic lifts significantly impact costs.

Insurance: Policies typically run 1-3% of the locomotive's declared value.

Timing: Rush moves often involve premium pricing and expedited permits.

Typical Price Ranges

Short-Distance Regional Moves: \$30,000-\$60,000 within 500 miles.

Cross-Country Hauls: \$75,000-\$150,000 depending on length, permits, and escorts.

High-Value Climate-Controlled Moves: Upwards of \$200,000 when additional handling and security are required.

Safety Protocols in Locomotive Hauling

Safety is the top priority in locomotive transport. Even minor accidents can result in significant financial and operational losses.

Rigorous Pre-Trip Inspections

Before departure, all equipment, trailers, and securement systems undergo full inspections to meet FMCSA standards.

Vibration and Shock Mitigation

Specialized suspension systems and reinforced cradles reduce the risk of structural damage during transport.

Real-Time GPS Monitoring

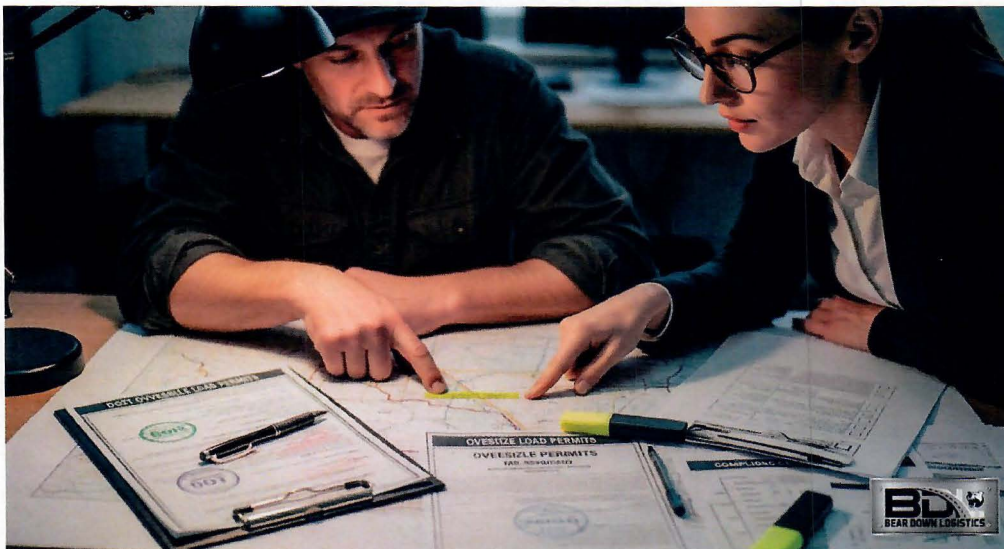
GPS trackers and 24/7 monitoring allow logistics teams to respond instantly to unexpected route changes or emergencies.

Emergency Response Plans

A trained response team is on standby in case of mechanical issues, accidents, or road closures.

Step-by-Step Process for Locomotive Transport

A structured approach is essential to move locomotives safely across the country while meeting strict compliance, safety, and efficiency standards. Each stage requires precise coordination between logistics providers, state agencies, and specialized crews.



Initial Assessment

The process begins with a full evaluation of the locomotive's dimensions, weight, and operational condition. Accurate measurements determine trailer type, number of axles

required, and escort vehicle needs. This step also identifies whether disassembly of minor components is necessary to reduce height or width.

Obtain Permits and Route Approval

Oversize permits must be secured in every state along the route. Coordination with Department of Transportation (DOT) officials ensures the convoy follows approved corridors designed for heavy freight. Permit processing can take several days, so early submission is essential. **Oversize/Overweight permits** are required state-by-state for loads exceeding legal dimensions (typically >8.5 ft width). Multi-state permits are mandatory for cross-country moves.

Secure Rigging and Equipment

Heavy-duty cranes, hydraulic jacks, and specialized multi-axle trailers are reserved well in advance. Pilot cars and, where mandated, police escorts are also scheduled to ensure compliance with state requirements.

Load the Locomotive

Professional rigging teams manage the loading process, lifting the locomotive onto the trailer using reinforced cranes. Heavy-duty tie-downs and blocking systems stabilize the unit to prevent shifting during transit.

Execute the Move

The convoy departs along the approved route, monitored via GPS and supported by pilot cars. Real-time communication between drivers and logistics coordinators helps navigate detours or unexpected road closures.

Handle Customs if Required

For cross-border shipments, customs paperwork, including commercial invoices, certificates of origin, and oversize permits, is submitted in advance to avoid clearance delays.

Following proven best practices ensures smoother moves and minimizes risk.

Partner with Experienced Providers

Working with experienced logistics providers who understand **cost factors in aerospace and heavy equipment transport** ensures compliance and efficiency.

Plan Months in Advance

Large-scale locomotive moves often take months of coordination for permits, escorts, and equipment booking.

Maintain Transparent Communication

Drivers, coordinators, and clients should have real-time communication channels for updates and incident management.

Secure Comprehensive Insurance

Coverage should match the locomotive's full market value and include provisions for damage, theft, or delay.

Ensuring Safe and Efficient Locomotive Transport

Transporting locomotives across the country requires precision, expertise, and compliance with stringent regulations. From specialized trailers and escort vehicles to rigorous safety protocols and multi-state permits, every detail matters. With proper planning and an experienced logistics provider, companies can minimize costs, prevent delays, and ensure their locomotives arrive safely and ready for service.

Partner with **Bear Down Logistics** for expert locomotive transport solutions. Our team specializes in cross-country heavy-haul projects, ensuring safe, compliant, and cost-effective delivery. Contact us today to plan your

locomotive shipment with confidence.

Frequently Asked Questions

Do Locomotives Always Require Escort Vehicles?

How Long Does It Take To Arrange Locomotive Transport?

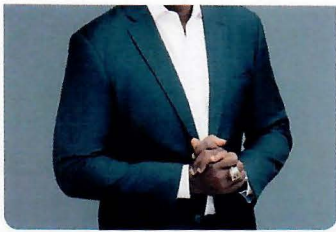
Can Locomotives Be Shipped Fully Assembled?

What Kind Of Insurance Is Recommended?

What's The Average Cost Of Cross-country Locomotive Transport?



Desmond Clark



Owner



The DNA and foundation of a company come from the character, personality, and mentality of its founder. The character, personality, and mentality of our Founder have been on public display since the age of 18 when he became a record-setting college football star at Wake Forest University. Later, becoming an All-Time Chicago Bear Tight End great during his 12-year NFL career. The same genetic code of ALWAYS being consistent, reliable, and professional that led to extraordinary success as an athlete is woven into the character and makeup of Bear Down Logistics. We will show up and perform when the lights are shining the brightest.



Black Ice on Roads: Causes, Risks, and Safe Driving Tips

November 7, 2025

Black ice is a hidden threat every logistics team needs on its radar.



How to Move Oversized Steel Hoppers Safely

November 5, 2025

When it comes to moving an oversized steel hopper, safety and precision are everything.



The Process of Relocating Mobile Homes and Container Units

November 5, 2025

Moving a mobile home or container unit can feel overwhelming, but when

Unlike ordinary snow or slush, black ice forms a thin, nearly invisible sheet across roadways, catching drivers off guard and sending even the best rigs sliding without warning. According to the U.S. Federal Highway Administration, an average year sees more than 1,300...

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Each move starts with accurate measurements, a calculated lift plan, and the equipment to handle the hopper's size and weight. Add proper securement, compliance with transport regulations, and careful route management, and you'll have a smooth move from start to finish. ...

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properly planned and executed, it becomes a structured, predictable project. From securing required permits and mapping a clear route to the precise lifting, loading, and placement at your destination, every phase plays a role. With the right equipment and a logistics plan built...

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clearance surveys, route suitability assessments, and seasonal condition considerations are essential.

Final Delivery and Unloading

At the destination, cranes carefully unload the locomotive. A post-transport inspection ensures structural integrity and prepares the unit for immediate operational readiness.

Common Challenges in Cross-Country Locomotive Transport

Even with careful planning, locomotive hauling often encounters unexpected difficulties.

Road Closures and Construction

Highway construction or sudden closures may force last-minute detours, increasing costs and delays.

Escort Vehicle Shortages

Limited availability of pilot cars, especially in rural areas, can postpone departures if not booked early.

Weather Impacts

Snowstorms, flooding, or high winds can halt travel for days. Flexible scheduling helps minimize downtime.

Permit Delays

Multi-state permits can take a week or more to process, delaying departure if not requested early.

Best Practices for Successful Locomotive Transport

Docket No. AB-1344X

EXHIBIT 14

Trains, “Transporting trains: Locomotives
and rolling stock moving via the highway”

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Transporting trains: Locomotives and rolling stock moving via the highway

By David Lustig | January 3, 2024

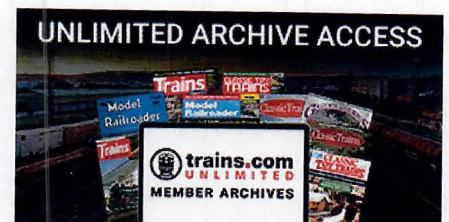


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Not everything can go by rail; some are too old, others travel to places without train service

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Locomotives and rolling stock: There are a variety of reasons that dictate railroad equipment is better off being transported by truck rather than train.

Locomotives and rolling stock may not meet current [railroad interchange standards](#), which includes being too old, and trucks or couplers that have been deemed unfit. They could be damaged beyond being made serviceable in the field or upon inspection, or deemed just not capable of safe train travel. Then, of course, there could just be no tracks to the final destination.

Driving on a Southern California freeway one day in the '70s, I spotted something ahead of me that was truly out of place; I was sharing the road with a wooden Colorado & Southern cupola caboosel! It was apparently moved in train from the Midwest to East Los Angeles, and then loaded onto a truck to its final destination. When the truck left the freeway and the driver pulled over for a moment to check his load, I shot this photo. Unfortunately, I forgot what the final destination was.



Wooden Colorado & Southern cupola caboose being moved. David Lustig

Locomotives are trucked, as well

When Sierra Northern Railway picked up the operating lease from the Ventura County Transportation Commission in California to operate its right-of-way from Ventura to Fillmore in 2021, a number of pieces of equipment owned by former lessor Fillmore & Western pieces of equipment were sent elsewhere.

Among them was Alco S6 1059, which was loaded onto a low-boy truck for its new home at the Virginia & Truckee Railroad in Virginia City, Nev. The locomotive, which started life as Southern Pacific No. 1059, was numbered 1229 in that road's 1965 renumbering before being sold to F&W.

Like the C&S caboose, the unit was detrucked to keep it within highway height clearances. The trucks were loaded separately on another vehicle.



F&W S6 being moved from Fillmore, Calif., to V&T in Nevada on Feb. 15, 2022. David Lustig

All the same, all different

Looking at such odd loads, you begin to realize that each piece of equipment requires a lot of advanced planning before being hoisted on to a truck bed.

When Chehalis & Western Railroad Alco C415 684 was retired from a career of hauling log trains, owner Weyerhaeuser donated it to the Washington city of Fife in 2009 to be put on display at the Fife History Museum in Dacca Park.



The 3-mile transport took about one and half hours; here riding on the back of Omega-Morgan's massive eighty wheeled trailer, No. 684 traverses the city of Fife's main streets en route to its new home in Fife, Wash., on June 26, 2010. Bradley

On the other side of the country, in Kentucky, a different truck transport configuration was used to move Louisville & Nashville Railroad 109, a coach built in the 1890s for the Glasgow Railway, that was said to be converted to a segregated "Jim Crow" era car. After its restoration in the 2010s, it was put on display at the [Historic RailPark & Train Museum](#) in Bowling Green.



The only surviving rolling stock of the Glasgow Railway is passenger car 109 — one of only a handful of such cars in a Jim Crow configuration remaining in existence. The car was moved to the Historic RailPark & Train Museum in Bowling Green where it was restored. View shows the car after restoration arriving at its new home on Feb. 12, 2013. Kevin Comer

And if you are wondering if this phenomenon exists only in the U.S., look no further than Brazil where Ferrovia Transnordestina Logística moved a six-axle EMD SD unit via truck when a secure direct rail connection was not available.



Ferrovia Transnordestina Logística SD18 No. 5022 being moved overland a distance of 1,535 miles on Sept. 7, 2016. Pedro Rezende

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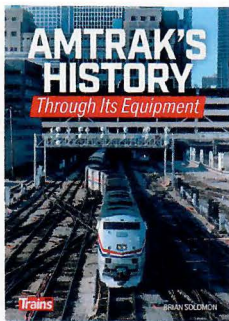
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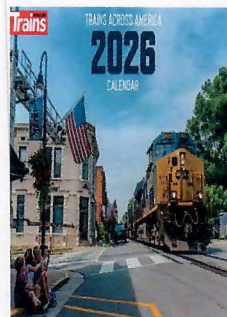
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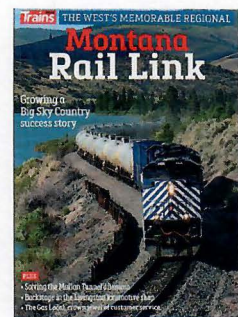
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Docket No. AB-1344X

EXHIBIT 15

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Building a Bright Future

GCC Energy owns and operates the King II coal mine near Hesperus and Colorado Energy Recyclers monofill in El Paso County, Colorado.

King II is a dry, underground mine that proudly carries on the historic tradition of mining in the Hay Gulch area. The mine supplies low-ash, low-mercury, super-compliant bituminous coal to our domestic and international customers. GCC is a vertically integrated company with King II supplying the majority of the fuel to manufacture our cement. It also supplies nearby homes with heating fuel and powers historic railroads in the U.S. and Mexico.

We are proud to be part of the local communities where our teammates live and raise their families.

Docket No. AB-1344X

EXHIBIT 16

The Colorado Sun article on Village at Wolf Creek

NEWS: OUTDOORS

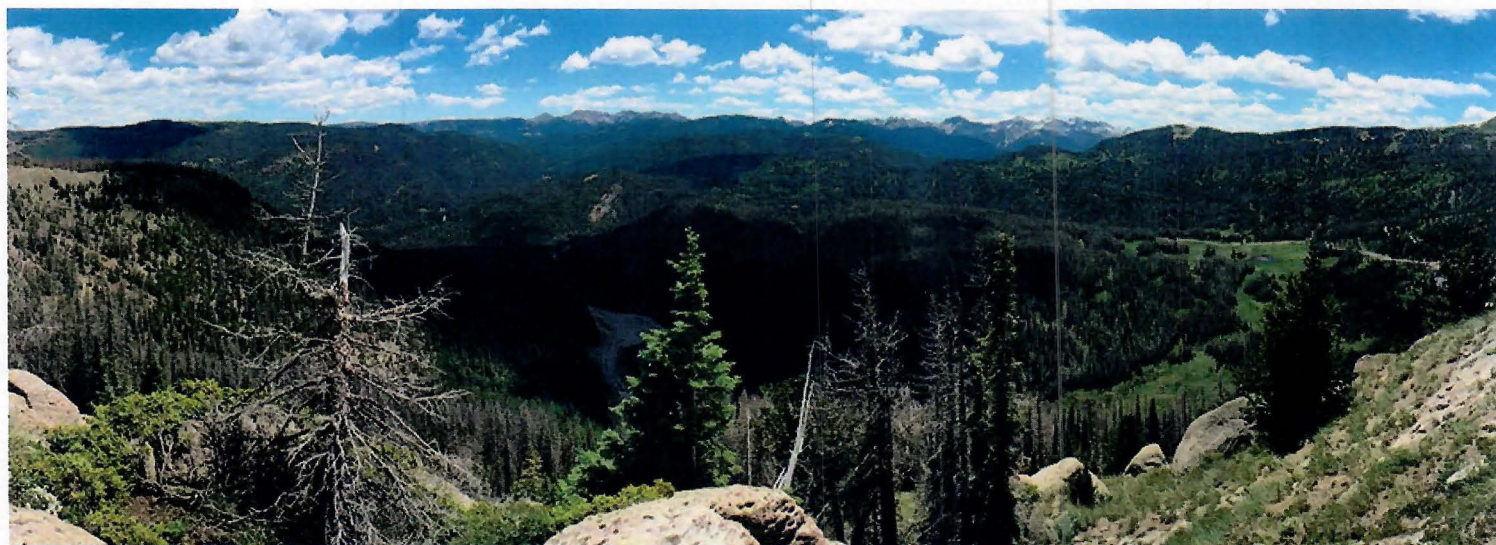
A rare win after nearly 40 years for Texas investors planning Wolf Creek Village

The 10th U.S. Circuit Court of Appeals last month threw out previous rulings and affirmed the Forest Service's approval of a road accessing the island of private land atop Wolf Creek Pass

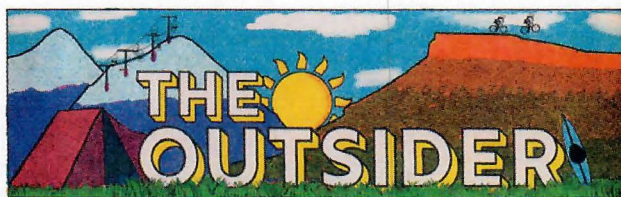


Jason Blevins

4:00 AM MDT on May 6, 2024 Updated 4:58 PM MDT on May 7, 2024



Texas investor Red McCombs swapped the Forest Service for 300 acres on Wolf Creek Pass in 1986. The late McCombs envisioned a resort village for 8,000 people on the parcel surrounded by Rio Grande National Forest and bordering the Wolf Creek ski area. (Courtesy The Village at Wolf Creek)



In the nearly 40 years that a legendary Texas investor spent trying to build a massive village atop Wolf Creek Pass, not a lot went his way.

Until last week.

After **almost a quarter century of lawsuits** challenging **the late Red McCombs**' proposal for a 1,700-unit village on 300 remote acres next to Wolf Creek ski area — and three court decisions siding with environmental groups battling the plan — the **10th Circuit U.S. Court of Appeals in Denver last week** threw out previous rulings and affirmed the Forest Service's 2019 approval of an access road connecting U.S. 160 with the island of private land.

"We are obviously pleased and feel like this was the right decision," said Clint Jones, who has worked for the McCombs family on the Wolf Creek Village project since 2008.

Lawsuits have stalked the **Wolf Creek Village** plan since its inception as McCombs reworked his project, abandoning a plan for a second land swap and focusing on an access road to the inholding of private acreage surrounded by the Rio Grande National Forest. McCombs, who died in 2023, had argued that the 1980 Alaska National Interest Lands Conservation Act — known as ANILCA — required the Forest Service to provide "adequate access" to islands of private land surrounded by public forest.

Environmental groups across the West have spent decades arguing that the clause in the act that requires the Forest Service to allow "adequate access" so private landowners can have "reasonable use and enjoyment" of inholdings does not apply outside of Alaska. The legislation protected 104 million acres in Alaska and left about 800,000 acres of private land surrounded by federally protected land. (Environmental groups most recently have **sued the White River National Forest** over its ANILCA-anchored approval of a 2.4-mile paved access road to a 680-acre inholding above the town of Edwards where developers plan 19 luxury homes.)

 **Listen here!**

Go deeper into this story in this episode of **The Daily Sun-Up** podcast.



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The ANILCA fight over the access road is the latest in a decades-long battle. And the issues reach beyond ANILCA. The environmental organizations raise concerns about endangered species, **like the Canada lynx**, and potential missteps by the Forest Service as it conducted its review of the access road plan under the National Environmental Policy Act.

Mark Pearson with the San Juan Citizens Alliance said the environmental groups are studying the federal appeals court decision and have not made any decisions about appealing or seeking a rehearing.

Regardless of any legal action, the Wolf Creek Village plan will require many more years of planning, with the developer needing a permit from the Colorado Department of Transportation to access U.S. 160 and permits from Mineral County.

“There are a lot of opportunities for public participation on upcoming decisions that will probably stretch out for quite a long time,” Pearson said. “There are enormous physical and structural limitations for a village up there. Is there enough water to support the city they are proposing to build? How are they going to get power up there? All this will require some significant planning and public scrutiny.”

A lot has changed since 1986, when McCombs and other investors first proposed a village atop Wolf Creek Pass next to the Wolf Creek ski area. The investors proposed a land exchange with the Forest Service, swapping about 1,600 acres in the San Luis Valley for about 300 acres of Forest Service land adjacent to the Wolf Creek ski area in Mineral County.

The staff at the Forest Service who approved the land swap and even the 2019 road access are gone. Same for the elected officials in Mineral County who supported the village plan nearly 25 years ago.

The initial plans for the Wolf Creek Village called for more than 2,100 condos, hotel rooms and homes for 8,500 people and 225,000 square feet of commercial space. Revised plans scaled back that plan to about 1,700 units.

McCombs, a San Antonio investor, owned hundreds of companies in his lifetime — including radio stations, car dealerships and **sports teams including the Denver Nuggets**. He was 95 when he died in February 2023. His daughter, **Marsha McCombs Shields**, has been overseeing the McCombs empire for 20 years.

“I do not know what their position will be for moving forward, but they are very excited that this one impediment that has been there for years has finally been resolved,” Jones said. “The industry has changed. Circumstances have changed. I do not know what they want to do with the property. Now that we’ve got road access, it opens the door to start studying future possibilities.”

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Docket No. AB-1344X

EXHIBIT 17

Photos of crossings of Colorado Highway 149 by Denver & Rio Grande
Railway Historical Foundation paved over by CDOT at different
locations (photos taken 12/9/25)





