



Grand County BOARD OF COMMISSIONERS

Colorado

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ENTERED

Office of Chief Counsel

March 17, 2026

Part of

Public Record

March 10, 2026

Surface Transportation Board

Chairman, Patrick Fuchs

395 E. Street SW

Washington, DC 20423

Delivered via electronic mail to: patrick.fuchs@stb.gov

Re: Uinta Basin Railway Mitigation Request

Dear Chairman Fuchs,

The Grand County Board of Commissioners is writing to formally express our opposition to the proposed Uinta Basin Railway project until specific, comprehensive environmental protections and mitigation measures are established within Grand County. While Grand County previously maintained a neutral stance, recent data and stakeholder consultations regarding the project's impact on the Fraser and Colorado Rivers have necessitated this formal intervention.

Grand County sits at the headwaters of the Colorado River, a critical water source not only for our local citizens and visitors but for millions of downstream users and the Colorado Front Range. The proposed project would introduce an estimated 3,650 two-mile-long trains through our county annually, drastically increasing the statistical probability of a catastrophic spill due to longer, heavier trains that have a higher risk of derailment.

Our opposition is based on the following critical requirements that must be met to safeguard our environment and economy:

- **A Comprehensive Mitigation Response Plan** specific to Grand County is developed and approved by the Colorado Department of Public Health and Environment, Colorado Parks and Wildlife, Grand County Government and our first responders.
- **Prepositioned Assets, Containment and Training** are extremely important and potentially very complicated, particularly if a derailment occurred in one of our steeply sloping and rugged canyons

which are immediately adjacent to the Fraser River and Colorado River. Therefore and prior to project commencement, the Seven-County Infrastructure Coalition needs to preposition proper assets and containment equipment necessary to mitigate and immediately contain a spill. This includes providing for and incurring the costs of training and additional specialized equipment costs necessary for Grand County first responder agencies, as well as the cost of placing an experienced contractor on retainer in the event of a waxy crude oil spill to promptly enact response plans.

- **Immediate Notification to Grand County Dispatch (911)** is imperative for critical response time to protect municipal water supply systems, our gold medal trout fishery, and the livelihoods of our agricultural community and outdoor recreation economy. A derailment of waxy crude into the Fraser River and Colorado is catastrophic to Grand County and the West Slope.
- **Establish a Response and Recovery Escrow Account** for immediate mobilization and clean-up costs, as well as issue a bond for long-term remediation. In 2010, the "Marshall" spill on a tributary to the Kalamazoo River took 10 years to clean up and restore 35 miles of the river which were polluted by 843,000 gallons of crude oil. According to the Securities and Exchange Commission filing in 2014, the cleanup costs were more than \$1.2 billion.

Grand County recognizes that oil needs to be transported before it is processed and distributed, however, we need assurances that all proper plans are in place to protect the headwaters of the Colorado River and not merely the state of Utah. In the last 50 years, there have been three derailments in our county, one of which resulted in a spill in Byers Canyon. This equates to an average of one derailment every 16 years.

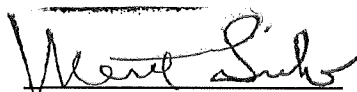
To summarize, Grand County is very concerned with the capacity and response times of the specialized emergency services capable of containing a crude oil spill (or any of the additional chemicals that this project may bring through our communities). Our watershed not only serves the citizens and visitors of Grand County, but the millions of people downstream and on the Front Range through transbasin diversions. In essence, should a spill occur in Grand County, it will have reverberating impacts across the entire state of Colorado.

Grand County respectfully requests you assist with ensuring these additional conditions are met to safeguard against potential environmental impacts to the Fraser and Colorado Rivers, and all of the interests that are dependent on that clean and safe source of water. Thank you for your continued support on matters within Grand County.

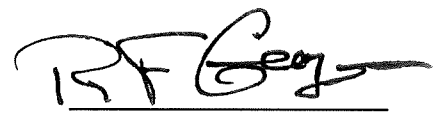
Sincerely,



Edward Raegner
Commissioner, Chair



Merrit Linke
Commissioner



Randal F. George
Commissioner

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