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Salida-area Parks, Open-space & Trails (SPOT)

PO Box 748, Salida, Colorado 81201

November 18, 2026

Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

Re: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company. Request for a condition concerning the Tennessee Pass rail corridor in Colorado

Dear Members of the Board:

Salida-area Parks, Open-space & Trails (SPOT) is a volunteer nonprofit that works to create, preserve, improve and build appreciation for parks, open space and trails in the greater Salida area. On behalf of our board, I write to ask that any approval of the proposed transaction include a condition requiring Union Pacific to engage in good faith with the State of Colorado and the communities along the Tennessee Pass corridor to plan for railbanking and interim public trail use of the line.

No revenue train has crossed Tennessee Pass since August 1997. For nearly thirty years the corridor has sat idle through the middle of our valley while the communities beside it have grown, and while the State and Union Pacific's 1996 letter of intent and the Heart of the Rockies trail feasibility study that followed have gone unfinished. The Board's review of this merger is the first real opportunity in a generation to restart that work. The Chaffee County Board of Commissioners voted unanimously on August 18, 2026 to make the same request, and we join them.

The Cleora to Buena Vista section

Our interest is the segment that runs along the Arkansas River from Cleora, just downstream of Salida, through Salida and north to Buena Vista. Today a person who wants to travel between these communities without a car has one practical choice, the shoulder of a state or federal highway. The rail grade is the only continuous, gently graded, river-level route through the valley, and it already exists.

Within the Salida area, this section would become the spine that our local trail network has always lacked. It would give residents of Cleora a safe way to walk or bike into town for school, work and errands. It would tie together places that are close on a map but poorly connected on the ground: Cleora, the Two Rivers neighborhood, the City of Salida's Vandaveer Ranch property, the Methodist Mountain trail system, and historic downtown Salida. Salida has seen what a former rail grade can do, and SPOT and its partners are the reason. In the early 1990s our founder, Donna Rhoads, organized the volunteer Salida Trail Committee, which grew into SPOT, for the purpose of turning the abandoned Denver & Rio Grande Monarch Spur right-of-way into a public trail. Working with the City of Salida, state trail funders and many community volunteers, the committee led the planning, development and construction of the Monarch Spur Trail between 1993 and 1997. Today it is a 2.5-mile paved path from the Arkansas River downtown to the west side of the city, the backbone of an in-town trail system of

more than eight miles, and the main non-motorized route from downtown toward Methodist Mountain. A trail on the Tennessee Pass grade would extend that same idea up and down the valley.

Between Salida and Buena Vista, a trail would give the two largest communities in Chaffee County their first non-motorized connection, linking neighborhoods, river access sites and public lands along the way and, in time, continuing toward Leadville.

Alignment with SPOT's mission

SPOT has spent more than two decades helping build and care for the in-town trail system that Salida residents use every day. The single largest gap in that system is regional: our trails end at the edge of town. A railbanked Tennessee Pass corridor addresses that gap more completely than any project we could undertake on our own, and it does so on an alignment that needs no new disturbance of the river corridor.

Benefits to our communities

- **Safe, everyday transportation.** A separated path lets children, older residents, commuters and adaptive users travel between neighborhoods and towns without sharing a highway shoulder with traffic.
- **Public health and access to the outdoors.** A level, river-grade trail serves people who will never ride a mountain bike trail, close to where they live.
- **Local economy.** Long-distance trails bring visitors who stay overnight and spend at local restaurants, lodging, outfitters and shops, and they spread that activity across more of the year.
- **Stewardship and history.** A managed public corridor along the Arkansas River headwaters supports river protection and gives communities a way to interpret the railroad heritage that built Salida.

What other Colorado communities have gained

Colorado has already shown what happens when towns are connected by bike paths. The Rio Grande Trail runs 42 miles from Glenwood Springs to Aspen on a railbanked Denver & Rio Grande Western corridor that local governments purchased in 1997 with help from Great Outdoors Colorado and the Colorado Department of Transportation. It now links Glenwood Springs, Carbondale, Basalt and Aspen, and the Roaring Fork Transportation Authority estimates that about 115,000 people a year use the Carbondale section alone. Eagle County's 63-mile Eagle Valley Trail connects communities from Vail Pass to Glenwood Canyon and, together with neighboring systems, provides more than 140 miles of off-highway riding between Breckenridge and Aspen. In Leadville, the Mineral Belt Trail turned abandoned mining-era rail grades into a loop that is now central to that town's identity and visitor economy. The Upper Arkansas Valley is the missing link between these networks, and the Tennessee Pass grade is the way to close it.

Railbanking keeps the corridor intact

We are not asking the Board to choose trails over trains. Railbanking under the National Trails System Act, 16 U.S.C. 1247(d), exists for exactly this situation. It preserves an out-of-service corridor intact, under the Board's continuing jurisdiction, for possible future rail transportation, while allowing a

meaningful public use in the meantime. If rail service is ever needed again on Tennessee Pass, the corridor will still be there in one piece. Without railbanking, the likelier long-term outcomes are continued disuse or piecemeal loss of a corridor that could never be reassembled.

Our request

We respectfully ask the Board to condition any approval of the transaction on Union Pacific's commitment to:

1. Engage in good-faith planning with the State of Colorado, Chaffee County and the other corridor counties and municipalities regarding the future of the Tennessee Pass line, including the Cleora to Buena Vista section;
2. Participate in a State-led update of the 1996 Heart of the Rockies feasibility study and a reestablished corridor working group;
3. Explore railbanking and interim trail use of the corridor, in whole or by segment; and
4. Refrain, while that process is under way, from actions that would foreclose railbanking, trail use or public access.

This request does not ask the Board to order a trail built. It asks only that Union Pacific return to the table it sat at in 1996. For our communities, that conversation is long overdue.

Thank you for considering these comments.

Respectfully submitted,

Tara Pettit
President, on behalf of the Board of Directors
Salida-area Parks, Open-space & Trails (SPOT)
info@salidaparksopenspacetrails.org

CC: Parties of Record

Certificate of Service

I hereby certify that on November 22 and 23, 2026, I served a copy of the foregoing comment letter on all Parties of Record in Docket No. FD 36873, by email to each party for whom the Board's service list shows an email address and by first-class mail to each party for whom it does not.

I further certify that on November 18, 2026, the date the letter was first submitted to the Board, I served a copy by email on the Secretary of Transportation, through the Office of the General Counsel of the U.S. Department of Transportation; the Attorney General of the United States, through the Antitrust Division of the U.S. Department of Justice; Michael L. Rosenthal, counsel for Union Pacific; Raymond A. Atkins, counsel for Norfolk Southern; and the Hon. Jenifer Soulikias, Administrative Law Judge.

/s/ Tara Pettit
Tara Pettit, President
Salida-area Parks, Open-space & Trails (SPOT)