



Vail Valley Mountain Trails Alliance
PO Box 3986
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www.vvmta.org

Issue Brief and Information:

Heart of the Rockies Rail to Trail and the Union Pacific and Norfolk Southern Merger Review

Purpose:

The Vail Valley Mountain Trails Alliance respectfully asks the State of Colorado, corridor counties, municipalities, agencies, and elected officials to use the current Union Pacific and Norfolk Southern merger review as an opportunity to revive the Heart of the Rockies Rail to Trail project along the Tennessee Pass rail corridor.

In 1996, during Union Pacific's merger with Southern Pacific, the State of Colorado secured a letter of intent from Union Pacific to explore conversion of the Tennessee Pass corridor into a public trail. That agreement led to the Heart of the Rockies Scenic Trail Feasibility Study. The current merger creates a timely opportunity to update that work and seek a renewed commitment from Union Pacific.

Key Deadline:

The Surface Transportation Board accepted the Union Pacific and Norfolk Southern merger application on May 28, 2026. According to the proposed procedural schedule, comments are due 120 days after acceptance, making September 25, 2026 the working deadline for comments from the State of Colorado, counties, towns, agencies, organizations, and other interested parties.

Requested Actions:

Counties and town councils can have the greatest impact by helping elevate this issue to the State of Colorado, building support among elected officials, and placing the Tennessee Pass corridor formally into the Surface Transportation Board merger record.

1. Ask the Governor's Office and State agencies to lead a coordinated Colorado response

Request that Governor Polis's office, the Colorado Department of Transportation, Colorado Parks and Wildlife, and the Department of Natural Resources lead a coordinated Colorado response to the proposed Union Pacific and Norfolk Southern merger that includes the Tennessee Pass corridor.



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Local governments and stakeholders should ask the State to coordinate with Eagle County, Lake County, Chaffee County, Red Cliff, Minturn, Leadville, affected municipalities, federal land managers, and community partners to pursue a renewed letter of intent with Union Pacific. That agreement should revisit the Heart of the Rockies Rail to Trail project, update the 1996 feasibility study, reestablish a corridor working group, and identify a path forward for railbanking, trail conversion, public access, and long term corridor preservation.

Local governments and stakeholders should also make clear that any local or state support for the merger should be tied to Union Pacific engaging in good faith discussions with Colorado and corridor communities about the future of the Tennessee Pass corridor.

2. Engage State and federal elected officials

Ask State legislators, Colorado's congressional delegation, and relevant federal partners to support a renewed Colorado and Union Pacific corridor agreement for the Tennessee Pass line.

Local governments and stakeholders should ask elected officials to help ensure that the Tennessee Pass corridor is treated as a statewide public interest opportunity, not only as a local trail issue. That support should focus on preserving future public corridor opportunities, preventing actions that could foreclose railbanking, trail use, public access, or long term corridor preservation, and encouraging Union Pacific to engage in good faith discussions with the State of Colorado and affected local governments before taking any action that could limit future public use of the corridor.

3. Submit formal comments to the Surface Transportation Board

[Submit formal comments](#) to the Surface Transportation Board in **Docket FD 36873** through the STB [Formal Filings portal](#) within the 120 day comment period. The Surface Transportation Board accepted the Union Pacific and Norfolk Southern merger application on May 28, 2026. Based on the proposed procedural schedule, the working deadline for comments is **September 25, 2026**.

The Town's comments should ask the Surface Transportation Board to recognize the 1996 Colorado and Union Pacific precedent and ensure that the Tennessee Pass corridor is included in the public interest review of the merger. The comments should request that Union Pacific enter into a renewed letter of intent with the State of Colorado and corridor communities to revisit the Heart of the Rockies Rail to Trail project, update the 1996 feasibility study, reestablish a corridor working group, and identify a path forward for railbanking, trail conversion, public access, and long term corridor preservation.

The Town's comments should also state that any local support for the merger is tied to Union Pacific engaging in good faith discussions with the State of Colorado, Eagle County, Lake



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County, Chaffee County, and corridor communities before taking any action that could foreclose future trail use, railbanking, public access, or long term public corridor opportunities

Proposed Core Message

Colorado supported Union Pacific's 1996 merger with Southern Pacific in part because Union Pacific agreed to work with the State on the Heart of the Rockies Rail to Trail concept. Union Pacific is now seeking support for another major merger. Colorado communities should ask Union Pacific to honor the spirit of that earlier commitment by returning to the table, updating the feasibility work, preserving future public corridor opportunities, and helping advance a public corridor vision that would benefit Eagle, Lake, Chaffee, and other Colorado communities for generations.

Why Railbanking and Trail Conversion Serve the Public Interest:

1. Local Control and Coordination

A public trail corridor would create a more predictable framework for counties, municipalities, public land managers, emergency responders, and community partners to coordinate access, crossings, signage, maintenance, safety, and trail connections within their jurisdictions.

2. Corridor Preservation and Future Transportation Flexibility

Railbanking would keep the Tennessee Pass corridor intact for potential future transportation use while allowing it to serve a meaningful public purpose as a regional trail. This approach would avoid fragmentation, protect long term options, and prevent the corridor from remaining inactive, unavailable, or lost as a public benefit.

3. Headwaters Protection and Crude Oil Train Risk

Railbanking would help protect the headwaters of the Eagle River and Arkansas River by reducing the likelihood that the Tennessee Pass corridor returns to active freight service for oil, gas, waxy crude oil from the Uinta Basin, or other hazardous materials. Given the strong opposition in Colorado to expanded Uinta Basin crude oil train traffic along the Colorado River corridor, communities along the Tennessee Pass corridor have a clear interest in ensuring those same risks are not shifted into Eagle County, along the Eagle River, over Tennessee Pass, and into the Arkansas River headwaters. A managed public trail would support watershed stewardship and give local communities and the State of Colorado a stronger role in managing a corridor that passes through some of Colorado's most sensitive river headwaters.

4. Community Connectivity, Recreation, and Public Health

The corridor could serve as a regional spine connecting existing and future trails, public lands, open spaces, river corridors, parks, campgrounds, trailheads, schools, businesses, transit connections, and communities across Eagle, Lake, Chaffee, and other Colorado counties. A planned public trail would create safe routes for walking, biking, running, commuting, adaptive recreation, and access to nature based experiences, supporting physical health, mental health, quality of life, and safer community connections for residents and visitors.

5. Economic Development and Tourism

A world class rail trail through Colorado's mountain communities would support local businesses, lodging, restaurants, outfitters, guides, events, and downtown districts while strengthening the region's outdoor recreation economy.

6. Past and Future Public Benefit

The Tennessee Pass corridor is part of Colorado's rail, mining, agriculture, and mountain community history. Reviving the Heart of the Rockies Rail to Trail project would preserve that history, create opportunities for interpretation and education, and transform an underused corridor into a lasting public asset that benefits communities today while preserving options for future generations.

7. Changed Circumstances Since 1996

Since the original 1996 Heart of the Rockies effort, Union Pacific has continued to rely on the Moffat Tunnel route for east west rail service through central Colorado and has now entered into a new 25 year Moffat Tunnel lease with the State of Colorado. At the same time, the historic local freight base that once supported rail service through the Tennessee Pass corridor has changed significantly. The agricultural and industrial markets that helped justify rail service in earlier eras, including produce, mining, and other local freight, no longer exist in the same form in Eagle County and surrounding communities. Any renewed freight use of the Tennessee Pass corridor today would need to be justified by a clear, current public need, not by speculative through traffic, hazardous materials routing, or the historic freight patterns of a very different Colorado economy. These changed circumstances strengthen the case for revisiting the inactive Tennessee Pass corridor for railbanking and public trail use, rather than leaving it unavailable to communities as a speculative future backup route.

8. Passenger Rail Realism

Future passenger rail through the mountains is an appealing idea, but reopening the inactive Tennessee Pass corridor for passenger service would require substantial capital investment, ongoing maintenance, and long term operating support. The historic local freight markets that once helped support rail service, including Eagle County

agriculture, no longer exist in the same form. Without a clear passenger demand model and dedicated public funding source, passenger rail would likely depend on renewed freight service to help justify and offset the cost of reopening the line. Corridor communities should ask what freight would actually run on Tennessee Pass, and whether speculative passenger service is worth the community, safety, watershed, and hazardous materials risks that could come with renewed freight operations.

Resources:

1. 1996 Feasibility Study Documents

- a. [State of Colorado official comments](#) on Union Pacific merger in 1996
- b. [Letter of Intent](#) between State of Colorado and Union Pacific in 1996
- c. [Heart of the Rockies Historic Corridor Scenic Trail Study](#) 1996
- d. [Heart of the Rockies Historic Corridor](#) Great Outdoors Colorado Legacy Project Concept Paper - January 6, 1997

2. Rails to Trails Information Resources

- a. [Railbanking](#), what is it?
- b. ["From Rails to Trails" documentary](#) on the history of rails to trails in America
- c. [Rails to Trails Conservancy Toolkit](#) for rails to trails projects

3. Website

- a. heartoftherockiestrail.org

4. Other Relevant Historical Documents

- a. [Eagle County proposal](#) for full or partial use of the Union Pacific Railroad Tennessee Pass rail corridor
- b. [Colorado Department of Natural Resources](#) memorandum regarding Union Pacific Tennessee Pass railbanking
- c. [Union Pacific letter to Eagle County](#) stating that it is not feasible to reopen the line for passenger rail service in 2012
- d. [Union Pacific Tennessee Pass Line: Efforts to Convert Rail to Trail](#). ECO Trails presentation to Town of Minturn Council, November 4, 2020

5. Union Pacific Merger With Norfolk Southern

- a. [Union Pacific webpage](#) with merger documents, timeline, and information

6. Draft Letter or Resolution Language

- a. [Here](#)



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About the VVMTA:

The VVMTA's mission is to maintain, create, and advocate for sustainable trail systems that connect people to nature, promote environmental stewardship, and strengthen community well being. The VVMTA is the trusted and enduring leader in trail based recreation, connecting a diverse community to well loved trails, supporting health, quality of life, and economic vitality, while championing a model of access and stewardship of our public lands that benefits everyone.

The VVMTA has been actively advocating for the revival of the Heart of the Rockies Rail to Trail project, including creating a public information website at heartoftherockiestrail.org to share the history, opportunity, and potential benefits of the project with communities along the corridor.