
Memorandum

TO: Administrative Record for the Denver Union Station Record of Decision

DATE: December 30, 2008

SUBJECT: Supplemental information regarding Appendix C

The Federal Transit Administration has evaluated the attached comments that had been transmitted to the Regional Transportation District (RTD) during the FEIS public review process but inadvertently omitted from the comments appended to Appendix C of the Record of Decision published November 17, 2008. The FTA has determined that these new comments do not represent new information, new circumstances or new environmental concerns relevant to the Environmental Finding contained in Section 1.7.1 of the Record of Decision.

Written Comments partially inadvertently omitted from the comments appended to Appendix C of the Record of Decision. Original comment and response are italicized.

25-1) Comment from Bob Brewster

PREFACE

The following comments and questions are being offered in the context of constructive criticism by an avid and active proponent of mass transit, particularly rail transit. I possess a lifelong interest in the subject and I've worked in the industry for 39 years.

Pertaining to Denver Union Station (DUS), I have served on the Union Station Advisory Committee (USAC) since the beginning. Attending the USAC meetings was often an exercise in futility, since criticism of the direction of the priorities was not welcome.

I also submitted a host of comments and questions to the DUS DEIS. While many of those comments were directed at the burial of the heavy rail tracks, now rendered moot, I request that those comments and questions still pertinent be part of the Final EIS record. The undergrounding issues, however, may still apply to the proposed below-grade bus facility.

EXECUTIVE SUMMARY

The re-activation of DUS is an exciting opportunity of a lifetime to alter the course of transportation options for the city, region, state, and nation. It has implications regarding energy, environment, pollution, land use, commerce, quality of life, and much more. The prospect of an actual transportation system is an amazing achievement in a state that has consistently failed to grapple with its myriad transportation obligations.

Taxpayer approval of RTD's FasTracks plan made this achievement possible. The voters led the way. Yet they are being short-changed by the failure of the DUS Master Plan to deliver the OPTIMUM facility that they demand and deserve. There are convenience and efficiency compromises. There will be capacity constraints because the station will open with virtually all tracks occupied during peak periods, leaving no room for the expanded services of the future. There will be no through-service - ALL passengers travelling beyond downtown will be forced to transfer - as much as a 3 block endeavor.

Regrettably, the DUS Master Plan prioritizes real estate development over efficient, customer-oriented transportation. That was apparent from the first presentation that offered an (Inappropriate content) of consultants and developers armed with a collage of charts, diagrams, and renderings. Indeed, the first USAC exercise instructed the participants: "Where do you want the buildings?" rather than "Where do you want the trains and buses?"

[BEGIN PREVIOUSLY OMITTED TEXT]

The following text will itemize the various issues that diminish the potential of DUS to be "all that it can be." And it will challenge the oft-repeated notion that the station's grandeur and historical status will be honored and respected - by concealing it behind new structures?? or by photographing the pedestrian concourse then destroying it??

The enumerated comments are not mine alone. Many prominent rail proponents and those in other professions have expressed severe reservations about the Master Plan's deep flaws. In fact, there is a general sentiment, or resignation, that we are "stuck" with the plan. That's pathetic! This is one of the most important projects to ever face Denver. It is the

proverbial "golden opportunity." Yet we have but one opportunity to "get it right." The redevelopment of DUS is about the future, our future. Once doors are closed and paths blocked, there will be no going back to undo the short-sighted decisions presented in the current plan.

The transportation components of the project before us are far too important to be eclipsed by the desire for yet more development in an already vibrant neighborhood. We are told we must have the private development in order to pay for the redevelopment of DUS. Really? For what transportation components is the developer paying that he will not receive reimbursement in the form of tax increment financing? Isn't that just a loan? Can't we get a loan with better terms rather than compromising on the transit elements that inspired this project in the first place? I find it difficult to believe that the quarter-billion dollars available through FasTracks funding could not build the transportation infrastructure that is appropriate for the site. That, of course, would indicate a different plan: one that does not stretch into and under the developer's other properties. A plan that actually serves the customer (the taxpayer paying for it) rather than the developer.

Much has changed during the 6-year process that brings the FEIS upon us. Another oil crisis, increased ozone alerts, FasTracks funding shortfalls, and the current global economic debacle, set off, of all things, by curious real estate dealings throughout the private sector. Imagine.

A great deal of time was expended pursuing an impractical plan that buried the heavy rail mode. The USAC facilitators did not want to hear the chorus of criticism on that issue but reality set in eventually. The planners then said the new plan was much better than the old "really good plan." It whets the appetite to see what the "third-time-is-a-charm" much, MUCH, better plan might look like, especially if transportation planners, rather than developers get their hooks into it. The worst scenario is a panic-mode rush to break ground on a flawed foundation. The entire Master Plan must be re-evaluated for efficacy. The biggest flaw of all is the failure to look at the transit elements through the eyes of the prospective transit user. What will it take to get them out of their single-occupant automobiles? This plan only scratches that surface.

COMMENTS AND QUESTIONS

TRANSPORTATION OPERATIONS

I. RELOCATION OF LRT TO CML SITE:

WILL cost unnecessary funds to alter something that works perfectly well - with possible modifications. Violates cost-effective command in Master Plan Mission Statement (MP MS).

WILL draw large numbers of people away FROM DUS rather TO DUS, as desired in MP MS.

WILL make connections far more inconvenient, far more difficult for disabled patrons and those with luggage, and far more imposing to transit users, especially new and occasional riders, violating promise of "more convenient connections" clause in MP MS.

WILL violate spirit of ADA laws, if not letter of those laws.

WILL be contrary to pattern across U.S. where LRT spurs have been or

are being EXTENDED TO train stations, such as Baltimore, San Jose, Sacramento, Los Angeles, Portland, San Francisco, Minneapolis... Neighboring Salt Lake City has the dubious distinction of having had LRT chase down the escaping heavy rail as it was pushed out of downtown's 2 beautiful, historic rail stations into a seedy warehouse district. That previous SLC city administration's woeful lack of vision is appalling! Yet the DUS plan approaches that audacity. Imagine it - Denver REMOVES LRT 3 blocks FROM its historic station while so many other transit properties are directing LRT TO station sites!!!

IS a blatant conflict of interest on the part of the developer since USN owns the real estate parcels between DUS and the proposed LRT site as well as the high rise towers across the CML.

WILL paint LRT into a corner by making it difficult and vastly expensive to extend LRT north, west, or east for future transit expansion because of barrier posed by large rail yards.

WILL add significant cost to RTD's Mall Shuttle operations (vehicles, operators, service hours) as it must extend almost 3 blocks to new LRT station AT TAXPAYER EXPENSE, to solely benefit the developer's other property investments (conflict of interest?). It will also add parallel costs of extending the new circulator, plus additional expensive tunneling for the circulator to reach the already expensive and unnecessary underground bus facility. That bus facility would be much less expensive if it were placed over the heavy rail tracks (rather than public parking), close to the bus ramp, for convenient connections and efficient operations. Placing the bus facility there would also REALLY activate the 18th St. mezzanine level - a concern with many observers. Parking could be above the bus level.

WILL cause more LRT passenger reliance on shuttles because of farther location from lower downtown destinations. More reliance on shuttles could cause capacity overload conditions and leave little room for arriving bus and commuter rail passengers, perhaps several hundred from just one train.

WILL subject waiting LRT passengers to diesel exhaust from idling coal and freight trains on 3-track CML.

WILL NOT offer safety margin from derailing freight trains. Not long ago, a coal train derailed on the CML, spilling its load onto the LRT tracks in front of an approaching train. A disaster was narrowly avoided, but a service disruption played havoc with LRT passengers.

[If LRT should be moved, a Wynkoop St. alignment would address many of the enumerated issues listed above. I will submit a drawing.]

[Supposedly, the MP isolates LRT because of the existing crossing of Wewatta St. An LRT train can cross the street in 15 seconds, much less than many of downtown's traffic signals. Why is traffic more important than transit in this supposed transit/pedestrian-friendly "neighborhood?" Perhaps Wewatta is the problem, not LRT.]

II. THE BENEFITS OF A "THROUGH-STATION":

A "through-station" (T-S) is one in which the various transit modes merely stop, unload and load passengers, and then proceed en route to an out-lying terminus, where time-consuming layovers and reversing or

turn around operations take place. This minimizes dwell time at the busy main station, reducing infrastructure requirements and costs.

- A. A T-S is a more efficient form of station design, especially in congested downtown core areas. Why was it so readily discarded at DUS? [It is recognized that the current FasTracks plan has a "modal shift" at DUS: LRT to the south and commuter rail on the north half. That certainly shouldn't preclude either mode reaching beyond its current DUS terminus in the so-called "NexTracks" plans of the future. The CML is a logical extension to the south and the north offers many opportunities for LRT. But even going a short distance beyond DUS offers some interesting possibilities that would both serve large venues and tap into acres of mostly unused parking during weekdays - AND save infrastructure at DUS. At the very LEAST both modes should be poised to extend - don't close those potential pathways to the future, and that includes the tail tracks.]
- B. A T-S offers many passengers the opportunity for a "one-seat-ride," the holy grail of transit. That saves the passenger time and trouble - the twin obstacles in attracting transit riders. For example, commuter rail from Littleton to Boulder via DUS can better compete with driving time (on a good day!).
- C. A T-S can reduce the need for elaborate station infrastructure, saving limited, costly space. A more compact loading area may result expediting connections.
 - 1. Philadelphia's successful Center City Tunnel opened in 1984, connecting 2 former stub-end stations that were several blocks apart. A 12+ track facility and an 8 track facility were compressed into a 4-track run-through main line that offers the one-seat ride for everyone to all 3 major rail stations in the downtown area.
 - 2. Many LRT systems operate similarly, in that the routes form long corridors, with the downtown stop near the center of the route. Trains pause momentarily, then continue. Dallas, San Diego, San Francisco, Baltimore and Portland are but a few examples. The result is greatly reduced station infrastructure.
- D. Rail services beyond RTD's borders would also benefit with a T-S, such as Front Range commuter rail, DIA - I-70 mountain corridor, and even Amtrak.
- E. Retention of the existing tail tracks is essential to the eventual south rail reconnection. In the interim, they offer station track redundancy in allowing a train to switch tracks at the rear of the station in the event of difficulty with another train or piece of the physical plant, such as an interlocking.
- F. Suggesting that the CML will offer through rail service only aggravates the issues previously cited regarding the remote location of LRT, especially convenience and drawing even more activity away from DUS. That is unacceptable. Furthermore, there is no guarantee that the CML will be available for such use nor is there necessarily sufficient space. What would be the effect of multiple rail stations by the CML on the residents across the CML tracks (noise, lighting, privacy, etc.)?
- G. There is even an opportunity to allow for T-S operation of the bus mode if, and ONLY if, a suitable, cost-effective site can be identified and acquired, perhaps the far south corner of the Pepsi Center parking area. Such a location would permit that coveted one-

seat-ride for bus patrons to the Pepsi Center/Elitch Gardens locale, Invesco Field, and the Auraria Campus. Conversely, those venues offer parking for bus patrons leaving the area, since much of that parking "lies fallow" during the typical workday.

- H. The above "remote parking" scenario also could be deployed at the far end of the Coors Field parking lot if LRT could be routed in that direction, behind Coors Field, perhaps from the potential Wynkoop St. LRT alignment mentioned earlier. Utilizing those various, largely unused parking facilities for transit parking has been discussed years earlier, and it could reduce parking demand in the DUS neighborhood (as well as traffic).
- I. A T-S would reduce dwell time at DUS for diesel trains, reducing pollution emissions concentration.
- J. A T-S would facilitate discussion and implementation of new transit services, not yet identified or funded, by allowing such services to tap into existing infrastructure more readily. An investment in the future - a feature of the MP Mission Statement.
- K. Other major metropolitan areas are negatively impacted by the limitations of stub-end stations, such as Los Angeles, Chicago, and Boston. And there is fierce debate currently ongoing on how to direct rail traffic into Manhattan from the proposed new Hudson River Tunnels: into the through-track network at Penn Station or into a new dead-end station. New York Governor Patterson recently indicated he wants transportation priorities, not development opportunities, to guide that decision. Hmmm! And discussion continues on how to integrate the stub-end Grand Central Terminal into a through-rail network. Why is Denver squandering this wonderful, unique opportunity to have a through-station, thus avoiding the pitfalls and constraints of a stub-end station?
- L. Up to 50% of potential transit riders won't partake if a connection is involved. It is often not competitive with the private auto. If transit is to offer its full potential it MUST be competitive! That means offering express trips, one-seat rides, and through-services.

III. CAPACITY:

ITEM: Rail service and demand is growing in cities across the U.S.

Ridership in many places is up by double-digit percentages.

ITEM: There is a shortage of equipment and track capacity in many locations.

ITEM: Rail is the most fuel-efficient mode.

ITEM: Oil/gas cost and availability will continue to be a global anxiety - even crisis.

ITEM: Population growth is a given, perhaps moreso in Colorado.

ITEM: Amtrak has its most promising opportunity for expansion since its creation via Senate Bill 294. And it continues to set record ridership numbers. Yet there is no room for even one more Amtrak train in this plan!

ITEM: The I-70 Mountain Corridor continues to generate interest in a rail alternative.

ITEM: The perilous condition of the airline industry opens the door for new rail corridor services. Voracious appetite for oil by aircraft and passenger dissatisfaction beg for alternatives.

ITEM: DIA was designed with expansion being a major design component -

and expansion is occurring earlier than planned. Why not the same consideration for rail?

ITEM: The DUS bus facility is designed for extra buses, why not rail?

THEREFORE, WHY WILL THE RAIL COMPONENTS OF DUS OPEN LARGELY AT CAPACITY WITH NO SPACE FOR EXPANSION? Partly because there will be buildings where there SHOULD BE TRACKS! But that is not an either/or proposition. The bulk of the buildings can be placed OVER the tracks via leased or purchased "air rights," as is done elsewhere. The ground level footprint can be greatly minimized in this manner allowing for additional track capacity. It would also energize the mezzanine level, offering multiple areas of interest to the neighborhood.

Question: How does the planned capacity constraint prepare us for our future transportation needs?

Answer: It doesn't. This violates one of the basic principles of the Mission Statement. It is sufficient reason to not approve this plan.

End Part One.

[END PREVIOUSLY OMITTED TEXT]

Part II

COMMENTS ON THE FINAL ENVIRONMENTAL IMPACT STATEMENT FOR DENVER UNION STATION

ANCILLARY COMMENTS AND QUESTIONS

I. PRIORITIES

Thirty-five years after its creation, RTD successfully petitioned area voters to authorize a sales tax increase in order to fund an ambitious and comprehensive rail transit expansion project, FasTracks. Those in favor liked what they saw with RTD's initial LRT offerings and validated the assertion that our community would benefit from alternatives to the gridlock, pollution, and other trappings generated by the single occupant vehicles dominating our transportation matrix.

Denver Union Station (DUS) was designated to be both the centerpiece of the transportation network as well as the centerpiece of a new neighborhood bearing its name. The taxpayer/voters entrusted their various government agencies to carry out their wishes.

Instead, the planning duties were bartered away to a private developer, who happened to own significant parcels of land adjacent to the DUS site. The developer promptly removed 2 of the 3 transit modes from the DUS site and placed them amidst his other land holdings. The result is that most of the planned "foot traffic" will be removed from DUS, the designated goal, and distributed to the developer's "neighborhood." And the taxpayers will pay for extending the "free" shuttle operations to service his "neighborhood."

The private sector should certainly play a role in developing the Union Station Neighborhood (USN). But that role should have been a supportive one rather than a dominant one. The priorities have been reversed: rather than integrating private development with a sound, expandable transit system, the transit system has become subservient to and altered for the development, making it more costly and less efficient. Does the obfuscation of the Vision Statement guarantee the need for private investment? Are we being delivered Development-Oriented Transit instead of Transit-Oriented Development? Many prominent observers have commented that

DUS has become a real estate project rather than a transportation one. And a great many of them are uninspired by this plan.

II. FAULTY PREMISES ?

- A. That DUS can't be a through-station for all modes.*
- B. Opening the rail station at capacity prepares for the future.*
- C. Wewatta St. should be a through arterial.*
- D. Rail crossings "at grade" can't be tolerated.*
- E. There will always be only one Amtrak train in Denver.*
- F. There will never be any other rail services needing space at DUS.*
- G. The private sector is needed to activate and fund transportation infrastructure at DUS.*
- H. We can't learn from other transit systems.*
- I. Commuter rail cars will be of the single-level, MU type requiring high-level, longer platforms.*

III. ENVIRONMENT AND ENERGY:

- A. These twin issues can be addressed simultaneously by rail expansion. Rail is the most fuel-efficient and productive form of transportation available. It is the "low-hanging fruit" in addressing our excessive energy consumption and our heavy carbon footprint. The role of rail must be acknowledged and advocated.*
- B. DUS must be prepared to handle rail services not yet imagined or funded. We must not ignore future potential: it is an important component of the Vision Statement.*
- C. Front Range ozone levels and pollution add urgency for solutions. An OPTIMUM transit system will generate more effective public participation in the system.*
- D. Will our region and nation be prepared to handle fuel supply interruptions or curtailment without effective alternatives?*

IV. HISTORICAL PRESERVATION:

- A. DUS is a very significant building to Denver's history and heritage. For many decades it was the center of transportation and activity. With sound planning it can replicate its stature.*
- B. No matter how much spin (or lipstick) is applied to the proposed "bookend" buildings, they do not belong on the DUS site. They block views of the historic edifice and its architecture and will cast long shadows on it and the celebrated plazas. There was much resistance to them at USAC meetings (and elsewhere) but the protests were largely ignored. The two historic stations in Salt Lake City were similarly despoiled with adjoining buildings and the evidence should be observed there.*
- C. The pedestrian tunnel should be saved, modernized, and "daylighted" to Wewatta St. There is no need to change the grade of track level, which would destroy the tunnel. Save dollars and honor history!*
- D. Is it possible and advantageous to re-open the two former baggage and mail tunnels for pedestrian and/or bike use? Historical assets re-used for the 21st Century? The highest compliment and tribute?*
- E. History is not honored by hiding it. Or destroying it.*
- F. There is every probability that DUS could shine better than ever, framed by open air, open space and sun-filled plazas. Don't desecrate that vision with superfluous structures.*

V. THE STREET SCENE:

- A. In a May 1, 1994 Rocky Mountain News feature article, "Valley of Dreams," city planner Bar Chadwick commented that when Denver has a bad pollution day, the low-lying Central Platte Valley (home of DUS) has a REALLY bad day. She indicated that it would prudent to not encourage traffic in the area.*
- B. Yet that appears to be the priority with massive amounts of construction activity near by. The USN development will only accentuate that activity, although a heavy reliance on mass transit could partially offset the effects of increased traffic.*

C. When I questioned Ms. Chadwick in early 2008, 14 years later, I asked what has changed that traffic is now being encouraged in the CPV. The response was that the creation of Wewatta St. as a major arterial would quickly "expedite" traffic through the area, reducing pollution and creating alternatives to the LoDo street gridlock. Well, the LoDo gridlock is worse than ever, Wewatta St. is often a racetrack and it will soon be decorated with traffic lights and more traffic headed to and from all the new buildings going up and planned. Then there is the through traffic on this so-called "arterial." Other well-publicized asphalt attractions in LoDo include car chases, car crashes, hit and runs, shootings over parking spaces, and the tragic slaughter of the Bingham family by a drunk driver. Is this what is meant by energizing DUS and the "neighborhood?"

D. Can a case be made for discouraging non-essential traffic, diverting traffic toward the CML, and making parts of Wewatta into a pedestrian/transit mall? Why not replicate what has been so successful in Denver: the 16th St. Mall? That's a REAL neighborhood!

E. FASTRACKS BUDGET AND ECONOMY:

Transportation funding is already very elusive. Every dollar must count. The stupendous rise in RTD's FasTracks budget, coupled with great global economic uncertainty, is sufficient justification to re-evaluate all facets of the DUS plan. What can be done to decrease form and increase function? What must be done immediately and what can be phased in at later dates?

I am submitting some alternate concepts for DUS by mail.

END PART II.

Response: Analysis completed as part of the DUS Final EIS process indicates that the project can provide adequate capacity for all future passenger rail operations that are funded or part of an adopted plan. Final EIS Chapter 4 pages 4-22 and 23 describe how the passenger rail operations will accommodate all services planned for the future (year 2030). Though there is additional capacity in the current design, this project is not intended to provide unlimited capacity for unplanned, unfunded, future rail services. No potential future unplanned or unfunded projects were purposely precluded from utilizing DUS. There are several opportunities for flexibility and expansion at the station. RTD is obligated to provide a package of improvements that accommodates all improvements planned for construction within the 2030 timeframe, however, RTD cannot build out or even preserve every opportunity because the Record of Decision must be able to document that the proposed improvements are fiscally sound.

[ADDITIONAL RESPONSE TO PREVIOUSLY OMITTED TEXT]

Response: These comments focused on the decision-making priorities for 1) the light rail station location, and 2) determining adequate capacity considering the stub-end design of the light rail and passenger rail stations (which were already addressed in the previously included response.)

The light rail station location decision was based on its ability to adequately serve planned light rail services, including proximity to high percentage transfers, ADA compliance, and safety considerations. Every required transfer is known to discourage ridership or create a "ridership penalty". The DUS project has been designed to minimize the transfer time between the heaviest transfer movements. These movements are shown in Figure 4-7 of the Final EIS. As discussed in Final EIS Section 4.2, all ADA requirements will be met with new construction and several new options for circulation around the station and between modes have been developed. Critical to the decision about placement of the light rail facility was recognition that grade crossings of the surface street network through the Commons neighborhood would not provide safe or functional movements for vehicles or pedestrians at the intersection or along the Wewatta and 16th Street corridors.

Written Comments inadvertently omitted from the comments appended to Appendix C of the Record of Decision.

36-1) Comment from Ira Schreiber, President, Colorado Rail Passenger Association:

As the Final EIS for Denver Union Station has reached a final alternative for the layout and design of the transportation element and future building sites, the Colorado Rail Passenger Association (ColoRail) submits this letter to encourage the long-term success of this transit facility to accommodate current and future transit demand. In developing a multi-modal transit hub to accommodate local, regional and statewide transit needs, as well as transit needs in connecting with national transportation systems, this project will create an economically vibrant development that will facilitate expansion of transit usage in the region.

As an organization founded in the late 1980's, largely in response to the need to preserve tracks and right-of-way at DUS for future use, we are pleased with the achievements and overall direction the participating agencies have taken in implementing a transit hub at DUS.

ColoRail has consistently supported a station design that concentrates all modes at DUS, keeps commuter rail at-grade, and commits the relevant agencies to the preservation and eventual implementation of a through-station in order to meet future demand and operational requirements. With a focus on regional, Front Range, and statewide transit needs, we offer these comments in response to the Final EIS. Specifically, ColoRail supports the following:

- **All modes concentrated at DUS.** ColoRail supports the concentration of all modes at the DUS site in close proximity and in an efficient manner - including light rail, commuter rail, intercity rail; local, regional and intercity buses; bicycles and pedestrians; taxis and shuttles; and automobile traffic. ColoRail objects to the general dispersion of modes in the planned "Transit District" concept where modal transfer points are separated up to 2 ½ city blocks apart. For example, light rail service is roughly 2 ½ city blocks away from commuter rail services, and future intercity rail services could also be separated by the same distance. Concentrating light rail, intercity, and commuter rail services in a closer proximity will provide easier connections between those modes, easier connections to buses, and will better support the Purpose and Need statement that "transit ridership will increase due to the ease of transfers."
- **Through-Station** (tracks 1 and 2). ColoRail urges the preservation of right-of-way in order to extend DUS tracks to the south – and thereby connect with the CML – in order to reserve operational capacity and the ability to expand services to meet future transit demand. Creating a "through-station" will double the volume of commuter and intercity trains that can serve the station in the peak-hours as compared to a "stub-ended" station. While the ability to include tracks to south has been diminished during the study process, the possibility of extending tracks to the south still exists from tracks 1 and 2.
- **Commuter Rail at Grade:** ColoRail strongly supports the decision to keep commuter and intercity rail tracks at grade rather than placing those tracks below grade. These at-grade tracks will enhance operational efficiency and safety as compared to below-grade tracks. Further, with a planned preservation of right-of-way for an at-grade southern connection, a more efficient through-station could be available when transit demand necessitates future station expansion.

We strongly believe the unification of these elements will establish a transportation hub that meets the long-term transportation needs of both the Denver-metro area as well as the broader region of the Front Range and the state. The combination of these elements also provides a more economically viable station in terms of much lower construction costs but also in terms of increasing the potential throughput of the station; that is, more transportation function at a dramatically lower cost. This design will translate into a station that can handle a far greater number of people in a given day and a greater infusion of economic activity into the surrounding area. ColoRail offers the following analysis to specifically identify the transportation elements we support.

Colorado Rail Passenger Association (ColoRail)

Box 480452, Denver CO 80248

Comments to the Final EIS for Denver Union Station:

ColoRail Recommendations for the Transportation Element of DUS: **Below is a summary of issues by mode followed by ColoRail's position on the transportation element of Denver Union Station.**

Light Rail: The Final EIS places a new light rail station and all light rail service at the location of the Consolidated Main Line (CML), some 2 ½ blocks apart from the location of commuter and intercity passenger rail services. If this design were implemented, connections for riders will be more difficult than keeping light rail in its current location adjacent to commuter and intercity rail. ColoRail urges that the project should keep the light rail tracks in their current location generally and preserve the ability to bring light rail trains into the station area proper. If the CML location for light rail is insisted, preserving the existing light rail tracks into the station is prudent to meet this inevitable connectivity need.

RTD Regional Bus Station: ColoRail strongly supports the inclusion of the RTD regional bus station on the transit district site. However, at a roughly \$160 million cost of building the 22-bay underground facility, the cost impacts the sufficiency, capacity, and viability of other modes as well as the financing of the entire project. Similar regional bus capacity could be attained with an at-grade station or a station elevated above the commuter rail tracks at less than 1/3 the cost, thereby allowing funds for a more sustainable financing package and also the addition of an intercity bus station.

Mall Shuttle: It is recognized that the Mall Shuttle must closely link with other modes. With significant transit transfers to occur between incoming regional transit modes and the Mall Shuttle, whereby riders are traveling up the Mall to the bulk of downtown employment, ColoRail supports a Mall Shuttle pick up location closest to the congregation of other transit modes to enhance ease of transfers. If all modes were concentrated in one location, rather than a separation of light rail from commuter and intercity rail, and exclusion of intercity bus, transfers would be easier and in closer proximity than is allowed in the current design.

Intercity Bus Station: ColoRail supports the inclusion of an intercity bus station at the DUS site. The Final EIS for DUS excludes an intercity bus station in the final plan and the document also limits discussion as to the possibility of including an intercity bus station and avoids analysis as to the expected transfer between the intercity bus mode and other transit modes such as intercity rail. Currently, the Central Denver intercity bus station (20th and Arapahoe), is roughly 9 city blocks from DUS. This existing intercity bus station not only serves most of Greyhound's connections in the state, but also serves other intercity bus companies and services. With Greyhound Lines offering to move its current station to the DUS site, and to provide significant funding for the project, an opportunity is presented to greatly enhance transit connections at DUS and avoid the significant separation of intercity bus services from other transit modes.

Specifically, transfers between intercity and RTD regional buses will be greatly diminished in this modal separation. Transfers from intercity bus to intercity and long-distance passenger rail will be difficult if not prohibited. ColoRail supports the inclusion of a 14-bay intercity bus station at DUS in the planned car-parking garage to be located above the commuter rail tracks between 18th and 20th streets. By constructing a 2nd level (+1) bus facility between 18th and 20th Streets, with Wewatta St. access, intercity buses will have a DUS location, will have the simplest access from I-25 and the 20th St., and will offer a large increase in transit transfers. While ColoRail supports a DUS location for an intercity bus station as the preferred alternative that would create immediate connectivity between modes, a second alternative would be to establish an intercity bus station at a close-in rail station on the RTD system that would also have easy access to an interstate highway. That is, a connection would be established to DUS via an RTD rail line.

Track Capacity: Intercity and Commuter Rail Tracks: Due to a strong preference for commuter rail at-grade for cost and operational efficiency reasons, ColoRail supports a placement of commuter and intercity rail tracks at-grade. ColoRail further supports the preservation of right-of-way to the south of DUS so that a through-station may once again be created as demand warrants. It is worrisome however that the Project Management Team states a through station cannot be achieved. We feel this limitation of design is a political choice rather than a result of physical constraints and further gives automobiles preeminence over the interconnection of transit modes. It is also concerning that this viable alternative has been denied any meaningful analysis in the EIS process. That is, while the station was historically a through station and a viable alignment currently exists to re-create an at-grade, through-station, no discernable effort was demonstrated to find a solution.

A through-station is important for enhancing capacity and for operational efficiency reasons. The capacity of an 8-track, stub-station is estimated at half the capacity of an 8-track through station. Given the required 15-minute dwell time that commuter, regional, and intercity trains will face at DUS (FRA rules for brake check and inspection), each track will be limited to 4 trains per hour. Having a through-station eliminates the FRA inspection requirements and allows for half the dwell time of each train and thus twice the capacity for each track. Further, operational moves of splitting trains or giving room for extended boarding times may be needed. Transfers of baggage and packages might also be a foreseeable need in intercity movements. The Final EIS should identify preservation of through-tracks as a component of the design. This preservation would start with the "tail tracks" of tracks 1 and 2, and would continue the preservation to the south to Speer Boulevard and further south through the Pepsi Center land to make a connection with the CML.

Amtrak, Front Range, and I-70 Rail Service: ColoRail supports the inclusion of sufficient track capacity and length to allow for the accommodation of existing and expanded Amtrak services. While the build alternative allows for 1100 foot track length, Amtrak has stated a track-length need of up to 1740 feet. ColoRail supports the accommodation of this additional track length. Additionally, while the Final EIS only allows for two intercity rail tracks in addition to the six commuter rail tracks, ColoRail supports the preservation of additional track capacity for intercity rail services. With only two intercity tracks available in the peak hours, the addition of one more Amtrak long-distance train, or one Front Range intercity train, would fill the available capacity at DUS. That is, there is insufficient track capacity at DUS to accommodate growth in Amtrak long-distance service or the inclusion of envisioned Front Range trains or I-70 fixed-guideway service as identified in the I-70 PEIS. ColoRail urges a station design that would accommodate these future services that would serve the state beyond the Denver-metro area.

Purpose and Need Statements:

The Purpose and Need statements that guide this EIS for Denver Union Station highlight the importance of having various transit modes in one location offering close and efficient transit transfers, and also the importance of connecting local, regional, statewide, and national transit modes and services at one location. The Final EIS states the project purpose in part as follows:

"The purpose of the proposed project is to enhance the function of DUS as a multimodal transportation center for the Metro Denver Region and the entire State of Colorado. Improving DUS will bring together the various modes of transportation into one place and provide efficient and convenient access to and from downtown Denver. The proposed transportation improvements would help relieve traffic congestion, improve air quality, and provide additional mode options for the traveling public." Chapter 1, p. 1-5.

"With an expanded multimodal center, an opportunity exists to provide effective connections between the various transportation modes and services planned to serve DUS. These modal and service connections are expected to improve regional mobility and provide greater access to employment, community services, and other regional destinations." Chapter 1, p 1-9.

"It is also anticipated that improved transit connections to the region will increase transit use due to the variety of services offered, the multiple destinations served, the ease of transfers, and the improved passenger convenience. Without such an expanded multimodal center, current and planned transportation services would be limited in service effectiveness and passenger convenience. DUS would not be able to accommodate the level of transit service needed for the growing region and passengers would be forced to use multiple transfer facilities to make connections." Chapter 1, p 1-9.

"Traffic flow on major downtown streets would be affected, due to bus and rail services having to terminate at multiple downtown locations instead of converging at a central location to distribute passengers. Projected transit ridership would likely be lower under a decentralized system, due to reduced passenger convenience and less ease of transfer to reach destinations outside of downtown. The opportunity exists to re-establish DUS's historic prominence as a full-service transportation hub

and reinforce it as a distinctive gateway to downtown Denver, the Metro Denver Region, and the State of Colorado.” Chapter 1, p 1-9.

Likewise, the stated need for the DUS project includes the following:

Need to Provide Connectivity between Transit Modes Operating In the Region

“The connectivity and integrated service opportunities afforded by a centralized transportation center will improve the user’s travel experience in terms of ease of travel, travel time savings and arrival at destinations in the most efficient manner.

Travel time savings is one of the most important factors in increasing transit ridership. Two ways to improve overall travel time are to provide effective connections between transit modes and to minimize wait time between transfers. Expansion of the DUS multimodal transportation center will provide an opportunity to connect with a number of transportation modes and services planned for the facility. As noted in Table 1-1, travelers will be able to transfer between the major corridors in the region by a variety of modes: passenger rail; LRT; BRT; regional, express, and local bus; private carriers; and other planned transportation modes and services. The possibility also exists for connecting with high-speed rail in the future. Through effective service connections, the wait time between transfers will be minimized and travel time will improve for the greatest number of transit riders.” Chapter 1, p. 1-10.

Need to Provide Connections with National, Statewide, Regional, and Local Systems and Networks:

“Expansion of DUS would provide an opportunity to connect with national, statewide, regional and local transportation systems. Many of these services are currently spread throughout the downtown and Metro Denver Region, with no connectivity provided between services. For example, regional and express buses currently access the downtown area at a stop located behind DUS as well as three blocks east of DUS at the Market Street Station. Additionally, local buses operate from curbside bus stops on Market Street, Blake Street, 15th Street and 17th Street.” Chapter 1, p. 1-12.

ColoRail supports these Purpose and Need Statements but questions the degree to which they have been carried out in developing the project given that modes are disbursed, intercity bus is not included in the project, more effective transfers can be provided, and planning for growth and expansion is limited. With light rail being separated roughly 2 ½ blocks from commuter and intercity rail services, and intercity bus not included, the identified modes are disbursed beyond a reasonable distance for travelers. This disbursal of modes will lessen the convenience in making transfers and thereby diminish transit ridership potential compared to closer concentration of modes.

ColoRail also questions the application of the Purpose and Need statements regarding the provision of transit capacity and the potential for growth. With only 8 commuter and intercity rail tracks being provided for in the station area, and only two of those tracks available in the peak hour for intercity services such as Amtrak and Front Range rail, any additional service expansion will lack the necessary track capacity. It is likely that the opening day capacity may not accommodate opening day transit demand.

Public Participation Process:

Though numerous public comment opportunities existed throughout the study process, the choice of a project developer changed the stated alternative that occurred in the early EIS phase. When a developer was chosen, the preferred plan was shifted from what had been agreed to in the early EIS phase to a different project configuration that was never presented to project participants for agreement. Thus, a unilateral change in the station area design was implemented by the Project Management Team and then presented to advisory committee members without any meaningful public comment. This change in design absent public input rides roughshod over the NEPA public process requirements in conducting an EIS.

Expense of Project:

With a stated \$435 million project cost, financing this project will be difficult. ColoRail takes the position that given the high cost of the below-grade regional bus facility, other modes will suffer in their effectiveness. The project in the Final EIS Build Alternative has an associated high cost that necessitates a degree of commercial development that has sacrificed the function of transportation modes. That is, in order to finance the transit improvements, additional commercial development to finance improvements. Rather than looking at how to reduce the cost of the transportation infrastructure – such as building the regional bus facility at-grade or elevated above the commuter rail tracks – and thereby saving over \$100 million in project costs – additional development has been included in the project to the degree in which transportation functions have been sacrificed.

ColoRail Recommendations:

ColoRail strongly supports the development of Denver Union Station as a multimodal hub that can serve the transit needs of the Denver-metro area, statewide, and beyond. With a close concentration of all transit modes, preservation of right-of-way to allow for a through-station, increased track capacity for intercity and long-distance passenger rail, a lower cost regional bus facility, and the inclusion of an intercity bus station, the DUS project can be the world class facility it seeks to be. ColoRail recognizes the importance of this transit hub in addressing the region's and the state's transportation needs and in creating a vital economic growth engine. ColoRail also recognizes the important work the participating agencies have done in developing this crucial transportation asset within a difficult and constricted site location. With the addition of the improvements identified in these comments, the DUS hub has the potential to accommodate even higher levels of transit ridership in a more cost-effective manner. In summary:

- Leave light rail where it is currently located – adjacent to the commuter rail tracks.
- Utilize existing infrastructure as much as possible including retaining the existing pedestrian tunnel walkway.
- Construct the RTD Regional Bus facility at-grade or elevated one level as opposed to a below-grade, and costly, facility.
- Include an intercity bus station in the DUS project. If the RTD regional bus facility were combined with an intercity bus facility, both modes could be located at DUS at a lower cost than what is estimated in the Final EIS for only the regional bus facility.
- Increase the capacity to accommodate intercity trains as well as additional Amtrak long-distance trains.
- Preserve the ability to have a “through-station” in the future.

Response: Your comments focus on the light rail station placement, regional bus station elevation, transfer to and from the Mall Shuttle, inclusion of an intercity bus station, passenger rail capacity, a through-station concept, the specific configuration needs of Amtrak and potential future services, and public participation.

Critical to the decision about placement of the light rail facility was recognition that grade crossings of the surface street network through the Commons neighborhood would not provide safe or functional movements for vehicles or pedestrians at the intersection or along the Wewatta and 16th Street corridors.

The decision about the elevation of the regional bus facility was made to optimize capacity for regional and commercial buses and to improve transit transfers to and from the Mall Shuttle and Circulator for all modes. The Regional Bus Facility can not be accommodated at-grade due to traffic and circulation conflicts. Accommodation for intercity bus has been made in the Regional Bus Facility. Two bays will be dedicated to future carriers, with the possibility of additional service at other bays during off-peak hours. The project team engaged Greyhound in a determined effort to find opportunities to relocate the existing downtown commercial bus facility to Denver Union Station, but both parties agreed that there was neither a funding mechanism nor an adequate site to be able to co-locate commercial facility on the DUS site.

Every required transfer is known to discourage ridership or create a “ridership penalty”. The DUS project has been designed to minimize the transfer time between the heaviest transfer movements. These movements are shown in Figure 4-7 of the Final EIS.

As described in FEIS Chapter 6, the pedestrian tunnel needs to be removed because expansion of the passenger rail facilities requires horizontally shifting and lowering the grade of the existing tracks which will significantly destroy the tunnels. The proposed bus ramp extending from 18th Street at-grade to the below-grade bus facility would also cut off access from the historic station.

Analysis completed as part of the DUS Final EIS process indicates that the project can provide adequate capacity for all future passenger rail operations that are funded or part of an adopted plan. Final EIS Chapter 4 pages 4-22 and 23 describe how the passenger rail operations will accommodate all services planned for the future (year 2030). Though there is additional capacity in the current design, this project is not intended to provide unlimited capacity for unplanned, unfunded, future rail services. No potential future unplanned or unfunded projects were purposely precluded from utilizing DUS. There are several opportunities for flexibility and expansion at the station RTD is obligated to provide a package of improvements that accommodates all improvements planned for construction within the 2030 timeframe, however, RTD cannot build out or even preserve every opportunity because the Record of Decision must be able to document that the proposed improvements are fiscally sound. Finally, the designs of the passenger rail facility including the through-station configuration fatal flaws are described in Chapter 2 of the FEIS.

The project team is continually coordinating with Amtrak and Ski Train to make sure that the final station configurations will provide platform heights and track lengths that will meet their current and future needs. The project will also provide Amtrak with water, fuel, inspection, ticketing, baggage, restroom services, and office functions similar to their current operations and consistent with all federal requirements. Additional coordination will confirm that an acceptable temporary station is provided to both services while the DUS project is under construction.

The DUS project has implemented a broad public involvement program, and has exceeded NEPA requirements for public involvement. Over 700 persons throughout the metropolitan region and the state are part of the DUS mailing list.

37-1) Comment from Nathanael Nerode

The plan in the FEIS is good in many ways, but it fails to plan for expansion of train services, which is fatal. In the long run, you're going to want both through platforms and longer platforms at DUS. Although you can build through platforms on the Consolidated Mainline, you can't build longer platforms, due to the curves. You also can't extend the existing platforms at DUS much to the north.

There are two ways to address this: one is to take the ROW south of 16th Street, continuing to Wewatta Street, along the line of the current tail tracks. (And cutting or burying 16th Street.) Unfortunately the FEIS proposes to lose that ROW permanently, rather than expanding it.

The other is to make room for new, long, straight platforms next to the Consolidated Mainline. Unfortunately, it appears that the FEIS doesn't leave enough space for such platforms, by putting the CPV light rail line terminus quite close to the CML! There would only be room for short, or heavily curved, platforms, and only on the freight mainline (not on sidings)! It is unlikely that a significant number of train movements would ever be allowed to such a platform under those circumstances.

This makes for a fatal defect. Throwing away the ability to build more long, straight, through-running platforms later is insane -- you'll regret it in 2030 when DUS is jammed with commuter and long-distance trains and has

no room for expansion because of the short-sighted "masterplan". The plan should have been designed, first and foremost, to preserve the ROW necessary for such future improvements in service.

On top of that, it creates a gratuitous three-block walk from the light-rail terminus to Union Station.

Throw it out and start over, this time focusing on the TRAINS. If you don't, you will be building another giant masterplan in 20 years -- only it will be ten times as expensive because it will require underground tunnels to build the necessary long, straight through platforms under all the expensive developments currently slated to be built.

Response: The project team is continually coordinating with Amtrak and Ski Train to make sure that the final station configurations will provide platform heights and track lengths that will meet their current and future needs. Additional coordination will confirm that an acceptable temporary station is provided to both services while the DUS project is under construction. The City and County of Denver currently owns the Wewatta Street right-of-way which the current tail tracks occupy south of 16th Street. The City has coordinated with the partner agencies and does not plan to vacate that property. Though it is not described in the FEIS, RTD owns property adjacent to CML that will allow for a third light rail track and platform or for additional flexibility for a future passenger rail station at that same location.

Analysis completed as part of the DUS Final EIS process indicates that the project can provide adequate capacity for all future passenger rail operations that are funded or part of an adopted plan. Final EIS Chapter 4 pages 4-22 and 23 describe how the passenger rail operations will accommodate all services planned for the future (year 2030). Though there is additional capacity in the current design, this project is not intended to provide unlimited capacity for unplanned, unfunded, future rail services. No potential future unplanned or unfunded projects were purposely precluded from utilizing DUS. There are several opportunities for flexibility and expansion at the station RTD is obligated to provide a package of improvements that accommodates all improvements planned for construction within the 2030 timeframe, however, RTD cannot build out or even preserve every opportunity because the Record of Decision must be able to document that the proposed improvements are fiscally sound. Finally, the designs of the passenger rail facility including the through-station configuration fatal flaws are described in Chapter 2 of the FEIS.

38-1) Comment from Warren Gregory

I like the idea of opening up 16th Street to traffic between Wewatta and Chestnut, but only because 18th Street will not be able to be made a through street now.

My comment concerns 17th street from DUS to the Light Rail terminal. The more I analyze the matter, the more I see logic in making this portion of 17th Street pedestrian and transit only.

I like the study your conducting on locating traffic to strictly one side of 17th Street, instead of divided. But why open any traffic from Chestnut to the Light Rail terminal?

If there must be a traffic component to 17th Street (I don't think there has to be), why not limit it to a single connection from Wynkoop to Chestnut Street? And locate the traffic on one side, as being studied.

That would make for two simple, non-divided, T-intersections--one at 17th & Wynkoop, the other at 17th & Chestnut.

These buildings will have access from a combination of locations including, 16th, 18th, Chestnut and Wynkoop. I would be very nice and successful to simply extend the pedestrian and transit only corridor from 16th & Wewatta, over to Union Station and then down 17th to the Light Rail terminal.

No traffic is needed here. People said 16th Street wouldn't work, that their businesses needed traffic access. It wasn't true. You must open part of 16th Street to traffic, so close 17th Street to traffic. Do this the right way and don't cater to business misconceptions regarding auto-dependency. that's not what Denver is trying to accommodate here--it is the pedestrian.

Yours Truly,

Warren Gregory

Response: The City and County of Denver prefers the proposed two-way cross section of 17th because it allows more flexibility for future parking garage access away from the complications of a high-volume, median separated Wewatta Street and the Mall Shuttle operations on 16th Street and Chestnut Place. 17th Street may end up being the only street the City chooses to use to provide parking and service access to the block between those four streets.