

October XX, 2019

Ms. Cindy Terwilliger
Regional Administrator
U.S. Department of Transportation
Federal Transit Administration
Byron Rogers Federal Building
1961 Stout Street, Suite 13301
Denver, CO 80294-3007

Dear Ms. Terwilliger:

I am writing to request that the Federal Transit Administration consider approving a request for a temporary and modest service change on the Regional Transportation District's (RTD) Southeast Rail Extension (SERE) as detailed in this correspondence. As you know, the SERE project was funded in part through a Small Starts grant agreement and opened for service last May. While the project has been a success overall, with ridership meeting our opening day projections and operations on the alignment working smoothly and as planned, RTD is facing severe challenges related to labor shortages and issues with recruiting and retaining light rail (and bus) operators. The situation for RTD's light rail operations has reached a point where the operator shortage has dramatically negatively impacted our employees and our ability to deliver reliable service to our customers. It is in response to these pressing and growing workforce issues that RTD is making this request. This letter details these challenges and the basis for this request.

Per the FTA grant agreement, service on the SERE is to be provided at weekday peak period frequencies of 10 trains per hour (tph) and a off-peak/weekend frequencies of 8 tph. Since opening of the SERE, RTD has been providing service consistent with these levels through the following service design:

- E line service from Ridgeway Parkway Station to Denver Union Station – 4 peak tph and 2 off-peak/weekend tph
- F line service from Ridgeway Parkway Station to the downtown Denver loop – 4 peak tph and 2 off-peak/weekend tph
- R line service from Ridgeway Parkway Station to Peoria Station via Aurora/I-225 – 4 peak tph and 4 off-peak/weekend tph

Our request is that FTA approve a temporary and modest change to RTD's off-peak/weekend service levels only on the R line from 4 off-peak tph to 2 off-peak/weekend tph. This would retain the peak service levels on SERE at 10 tph, while reducing off-peak/weekend frequencies from the current 8 tph to 6 tph, which is still a robust level of service.

I want to emphasize that this request is being made after careful consideration of all reasonable alternatives and in response to the unprecedented challenges RTD is currently experiencing with our light rail operator headcount. To illustrate the challenge, the attached table entitled "Denver RTD 2019 Light Rail Operator Headcount/Vacancy Report" depicts, on a monthly basis: the budgeted light rail

operator headcount, the average actual number of operators, the number of vacancies and the vacancy percentage. Since early summer, following the opening of SERE, the downward trend in operators and corresponding upward trend in vacancies is clear.

RTD's primary means to address these shortages is to mandate the remaining workforce to work overtime. Many light rail (and bus) operators have been required to work six (6) days per week every week for the past few years as RTD has struggled and failed to reach our budgeted headcount. This increases stress on the RTD operator workforce and makes it ever-more challenging for RTD to retain operators. I wish to assure you that RTD has made considerable efforts in recent years to recruit and retain operators in light of the current situation. Despite these efforts, light rail operator headcount continues to drop, exacerbating the problem and increasing the number of operators that we have to mandate to work overtime. Additionally, the increasing levels of overtime being worked increases our concerns regarding safety which, along with security, is RTD's top priority. I assure you that all our actions and decisions are taken with safety as our top priority, and that this is a key consideration in my request for FTA's approval of this proposed change in SERE service. Please reference the attached draft paper entitled "Workforce and Operator Mandating" dated 10.16.19 for more information on the problem for both our light rail and bus operations and our efforts toward resolution.

The operator vacancy problem is impacting our patrons in addition to our employees. The most visible manifestation of the problem to our patrons is in dropped service, resulting from a lack of operators to operate scheduled light rail runs. As recently as July 2019, the impact of dropped service was relatively small, with a total of 26 scheduled trips being dropped in the month and 27:31 hours of dropped service. However in August this grew to 296.5 scheduled trips being dropped and over 285 dropped hours of service and further increased to 339 scheduled trips being dropped and almost 300 dropped hours of service in September. It is frustrating to RTD and our patrons to not have a scheduled train in operation and the uncertainties this creates for our patrons is a frustration of which we're keenly aware and which is negatively impacting their commutes and travel.

RTD's request is carefully-considered and we believe is warranted based on the information and data I have provided regarding our growing problem with operator shortages and the resultant impacts to our employees, operations and patrons. This request is also supported by our ridership data and our service standards. Both the E and F lines from Ridgeway Parkway to downtown Denver have strong ridership and meet RTD's service standards, hence we are not proposing any substantial changes to their core peak and off-peak/weekend service levels and headways. In contrast, the R line ridership is substantially lower and it is not meeting our minimum service standards. [SERVICE DEVELOPMENT / JESSIE TO ADD COMMENTARY AND EDIT THIS PARAGRAPH, DOCUMENTING THESE ASSERTIONS]

Making this requested change to R line off-peak/weekend service, from 4 tph to 2 tph, will right-size our service given the ridership demand on that route, improving the performance metrics as measured by our service standards. Importantly, it will also appreciably decrease our operator requirements for daily and weekly pull-outs, helping us to address this severe light rail operator shortage. We project that this modification will allow us to decrease our level of mandating and will help us reverse the downward trends in operator headcount, eventually affording RTD the opportunity to reduce mandates and recover back to a more sustainable operator headcount.

This request is crafted to have minimize the impact to our light rail riders system-wide as it is a change on RTD's lowest performing light rail route, the R line. To clarify, we are not making this request with the intent of making a change in SERE service, but rather as a result of our need to optimize and right-size service to meet demand system-wide.

RTD understands this is an action that requires careful consideration by FTA, and we hope that FTA considers this request as a rational and defensible one in response to the serious and untenable situation that RTD currently faces. I also recognize that it is in the interest of FTA and RTD to avoid service changes of this nature, however I am convinced that this request is defensible and required given the situation as I have documented in this correspondence. RTD also recognizes that this request may not be granted as a permanent change by FTA, rather a temporary request – in which case we would request that it be granted at least through the end of 2021, hopefully allowing RTD the time needed to recover. If FTA grants this request, RTD will follow our processes for public notification and input as required for service changes prior to implementation.

I appreciate your attention and consideration of this request. If you have questions or desire additional clarification, please contact me or Bill Van Meter, Assistant General Manager, Planning.

Sincerely,

David A. Genova, General Manager and CEO

c: Dave Beckhouse, Deputy Regional Administrator, FTA
 Bill Van Meter, AGM, Planning
 Michael Ford, Chief Operating Officer
 Dave Jensen, AGM, Rail Operations
 Jessie Carter, Manager, Service Planning & Scheduling

Attachments