

July 24th, 2023

Debra Johnson, General Manager / CEO
Regional Transportation District
1660 Blake Street
Denver, CO 80202

ATTN: R Line Grade Crossing Issues, May - June 2023

Dear Chair Guissing,

GDT writes with concern regarding recent media reports regarding malfunctioning grade crossings on the R Line, namely a FOX31 (KDVR) article titled "Traffic light issues near RTD crossings worry commuters" published on June 12th, 2023.

Following the report, GDT took a trip down the northern portion of the R Line from Peoria to Florida stations on June 15th, 2023 to assess the situation. While the crossings on Peoria Street at 30th, 31st and 33rd Avenues were observed to be functioning normally, it was noted that the crossings at 17th Place and 17th Avenue, adjacent to the Anschutz-Fitzsimons campus, were not.

At these two crossings, trains were being authorized by control (when the operator radioed in) to pass the Automatic Block Signaling (ABS) signal immediately prior at red with stop & proceed procedures in effect on the crossings themselves. The crossings had a single attendant who was confirming to train operators that just the flashing warning lights were activated (presumably by using an override switch in the local comms house) and allowing trains to proceed under caution when the attendants' yellow flag was raised as per light rail operating rules. Gate arms remained in the vertical position throughout. Because the gate arms were not functioning and a lack of (highway) flaggers for drivers, several vehicles were observed crossing in front of the train with 1-2 seconds to spare. On the southbound trip this even prompted the operator to make an additional, full blast warning horn signal.

GDT therefore concluded that the risk of a train / road vehicle collision on these crossings was elevated during the period they were malfunctioning. GDT notes that under Federal Transit Administration (FTA) rules, namely 49 CFR Section IV, there is no specific flagging requirement in the event of a grade crossing malfunction. This is in contrast to grade crossings on the commuter rail system, where highway flaggers would have been required under 49 CFR § 234.105 Federal Railroad Administration (FRA) rules. GDT also notes that the operational characteristics and risks found at 17th Place and 17th Avenue are very similar to multiple crossings found on the commuter rail system and is wondering how this is aligned with the adoption of the Public Transit Agency Safety Plan (PTASP), which largely focuses on an operational risk assessment approach.

In the FOX31 news article, RTD is quoted as saying "flaggers were placed at the crossings", which is generally accepted to mean the type of flaggers who signal to motorists. This was not the case here as the flaggers actually deployed were there for the benefit of train operators, not road users. Therefore the quote was misleading in that respect.

On June 15th, 2023 RTD announced it was shutting the R Line down north of 13th Avenue Station to perform network repairs from June 16th. The affected section reopened on June 21st and a GDT visit on June 25th didn't find any safety issues.

Because of the issues witnessed at these crossings before the line was shut down for repairs on June 16th, GDT has the following questions for RTD:

1. On what specific date did RTD first receive reports that the grade crossings on Peoria Street or those on 17th Place and 17th Avenue were malfunctioning?
2. What factors were considered in the decision making process which resulted in the crossings being operated with the gate arms up but with no highway flaggers?
3. Were the Colorado PUC advised of the situation? If so, did they formally approve a temporary operational plan or did they simply raise no objections to the temporary method of operation?

GDT would appreciate a swift response to these questions as the details outlined above are somewhat troubling.

Kind regards,



Richard Bamber
Cofounder, Greater Denver Transit



James Flattum
Cofounder, Greater Denver Transit

CC: RTD Board of Directors