

Wednesday, June 19th, 2024

Debra Johnson, General Manager (GM) and CEO
Regional Transportation District (RTD)
1660 Blake Street
Denver, CO 80202

Light Rail Inspections and Rail Defect Remediations

Dear GM & CEO Johnson,

Adoption of American Public Transportation Association Rail Transit Track Inspection and Maintenance Standards

Greater Denver Transit (GDT) writes with questions relating to the adoption of American Public Transportation Association (APTA) standards for light rail track inspections. We are writing on the basis that APTA standard [RT-FS-S-002-02, Rev. 1](#), "Rail Transit Track Inspection and Maintenance", has been recently adopted by RTD to define the agency's light rail track inspection criteria. If this is not the case, please reply referencing what standard is actually in effect for light rail track.

We kindly request answers to the following questions by COB on July 3rd, 2024. While not every question may be fully answerable due to circumstances outside of the agency's control, we ask that questions be answered to the fullest extent possible.

1. On what date did RTD formally adopt APTA RT-FS-S-002-02, Rev. 1 as its track inspection standard?
2. If possible, please provide a copy of the track inspection standard that was previously used.
3. Could RTD staff have reasonably foreseen that a possible result of the introduction of APTA RT-FS-S-002-02, Rev. 1 as the agency's track inspection standard would be the widespread imposition of "slow zones"?
4. RTD has indicated that "trained staff now ride the system twice weekly..."¹. GDT takes this to mean "...riding over the track in a vehicle at a speed that allows detection of noncompliance with these standards", in accordance with Section 3.1.a (page 2) of APTA RT-FS-S-002-02, Rev. 1. Please describe the vehicle being used for this action, including how inspection staff can see the track whilst riding the vehicle, and state the average speed this vehicle travels at.
5. Are the "slow zones" being imposed in accordance with Section 10.1.8 and Table 11c (page 20) of APTA RT-FS-S-002-02, Rev. 1?
6. For rails suffering "rail burn" or "wheel burn", is rail grinding ("resurfacing") a solution up to a certain length and depth of defect? If so, up to what length and depth is RTD planning to use this remediation method?

¹ <https://www.rtd-denver.com/light-rail-speed-restrictions>, 'What are enhanced inspections?' drop-down

7. After the rail has been replaced or otherwise remediated, how long must a “slow zone” remain in place before it is considered safe for trains to pass over the affected area at maximum allowable line speed?

We would like to respectfully point out that statements of a general nature that claim track maintenance depends on “a number of factors”, without additional detail, will likely result in us writing back for further clarification. These information requests are made in accordance with the PUC’s request, transmitted on June 14th, 2024, that RTD “continue to increase its transparency to the public on its efforts to improve rail conditions and return service to normal operations.”

Agency Response to “Slow Zones”

As the imposition of “slow zones” without appropriate scheduling contingency measures continues to majorly inconvenience riders and further erode public trust in RTD, GDT requests that the agency carry out the following actions as soon as possible, with dates of execution clearly communicated to the public whenever possible:

1. Work with ATU 1001 to publish workable temporary schedules for the E, H, and R Lines which can reasonably be adhered to by operators. These schedules should be revised weekly and/or when “slow zones” are imposed or lifted.
2. Work with ATU 1001 to provide alternative methods of transportation for E, H, and R Line riders (e.g., bus bridges) to minimize adverse impacts on journey times.
3. Publish a schedule for all remaining inspections being carried out in the current quarter year cycle, which should be the first round being carried out, in accordance with APTA standard RT-FS-S-002-02, Rev. 1 and associated remedial works. This should include contingency dates for remedial works, should further defects be found during scheduled inspections.
4. Commit to 100% transparency with the public, including publishing all light rail-related incidents, inspection and remedial works going forward, as permissible.
5. Rescind communication restrictions that unnecessarily restrict staff and / or the Board of Directors from providing proper oversight, handling, and communications on this issue.
6. Respond fully to the questions earlier in this letter and also the Operations, Safety & Security Committee public comment letter sent in by GDT on Wednesday, June 12th, 2024. Please see a copy of said letter provided along with this submission for reference.

It may be the case that in order to best explain decisions or provide relevant information a face-to-face meeting is likely to have a greater chance of success. We are happy to accept and will gladly participate in this alternative.

Thank you,



James Flattum



Richard Bamber

CC: RTD Board of Directors
Dave Jensen, Assistant General Manager, Rail Operations