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*Transmitted by Email*

February 24, 2022

Federal Railroad Administration  
Office of Railroad Policy and Development  
1200 New Jersey Ave SE, MS-20  
Washington, DC 20590

Attention: Melissa Hatcher, Project Manager – Midwest Region

RE: Ann Arbor Station

Dear Ms. Hatcher:

Thank you for the opportunity to continue to coordinate on our mutual interest of addressing outstanding issues with the Ann Arbor Station NEPA/PE project. Please review the approach outlined below and provide direction on whether it meets the FRA's expectations or needs further revision. Once we've reached concurrence with these approaches, we will resume our effort to update the draft materials as part of the reinvigorated NEPA process.

It is our understanding based on your prior communication that FRA's outstanding issues are related to four areas: project size and scope; cost; location; and public comments. We offer our perspectives in this letter to address these areas and look for additional direction from FRA if this new approach is acceptable to the agency. If it is acceptable, then we will carry out additional public engagement and seek input from our Council to endorse this approach before we begin major work on a revised EA.

### **Project Size and Scope**

**Our understanding of the concern:** *FRA contends the overall project is of a size and scale not consistent with other projects in Michigan.*

- Station Size – The station and waiting area parameters reflect Amtrak's specifications and are appropriate for the ridership as defined by passengers per train and the overall intercity annual passenger projection. Recognizing customer access, comfort and station experience are conditions that have significant impact on passengers' modal choices, we would propose to consult with MDOT and AMTRAK again to ascertain if they would be comfortable with any reduction in the size of the station or its complimentary elements.
- Parking – It is understood the existing Depot Street station and site has a limited parking area to support intermodal operations including: short-term drop-off/pick-up; short-term vehicle waiting areas; and long-term parking. The amount of parking proposed in the new station design was aligned with ridership for short-term needs and with AMTRAK

guidelines for sizing of intercity passenger rail. However, the City's recently adopted A2Zero Carbon Neutrality Plan contains policy goals to reduce 50% of vehicle miles traveled (VMT) in the City which allows us to reconsider and justify a reduced parking demand for the station. We would like to work with other stakeholders including the FRA to revisit the size of the parking demand and seek concurrence on a reduction in on-site parking of at least 50% commensurate with our VMT reduction goal.

If we pursue a parking capacity of 250 spaces or less in the short term, this can be accommodated with the existing surface parking lot at the Fuller Road site. This may allow for construction of a new station without the need for a parking structure. Potential future investments should still be linked to actual ridership growth and experience over time.

- Bus/Intermodal operations - The current iteration of the station design includes elements to accommodate intercity bus and local transit operations as part of an intermodal transportation facility on site. The integration of these elements adds a significant area allocated to transit services and affects the overall station design and layout. Another opportunity for significant savings on the project would be to orient transit operations to an outdoor intermodal facility rather than contained within an indoor facility. We would seek input from the FRA as well as transit operators on this concept as part of working towards a responsive design alternative.

#### **Proposed strategies to address this concern:**

- *Consult with AMTRAK and MDOT on the station size to determine appropriateness*
- *Reduce the amount of parking based on new City policy goals.*
- *Consult with FRA and transit operators to plan an outdoor intermodal facility.*

#### **Project Cost**

Our understanding of the concern: *FRA believes the overall project cost is not commensurate with other stations along the corridor.*

- Size and Scope – As described above, there may be opportunities to reduce the size of the station, the amount of parking, and reconfigure the intermodal operations of the project. If there is agreement that these approaches are acceptable, there would be significant cost savings resulting from these changes.

#### **Proposed strategies to address this concern:**

- *Update project costs upon reaching consensus on the station scope and size*

#### **Location**

Our understanding of the concern: *FRA would like a further analysis of potential location alternatives.*

- Locational differences – the NEPA process evaluated numerous locations before determining that the Fuller Site was most desirable. The following gives a brief overview of the considerations that distinguish the Fuller Rd. Site from the Depot St. Site:
  - Fuller Road Site – The Fuller Road site offers numerous advantages that include: no need for additional right-of-way; the ability to build strong connections to transit; the ability to build strong connections to bike/ped facilities; better vehicular access; a larger site which affords layout flexibility; and proximity to major employment centers.

Additionally, the size of the available property at Fuller Street would allow the train station to be configured in a way to avoid building a parking structure.

- Depot Street Site – The Depot Street site offers some advantages which include proximity to downtown and marginally more public support, though it should be noted that our public engagement on this topic is five years old at this point and probably should be refreshed. Similar to the Fuller Street site, there are also strong connections to bike/ped facilities. Conversely, the location poses some design challenges that are not easily remedied which include: poor transit access; poor vehicular access; and constrained property size. Because of the site constraints, we would be unable to build a high-quality intermodal facility at Depot Street to encourage multi-modal connections to the train station. Furthermore, a recently approved site development on the adjacent 841 Broadway West property further complicates the ability to consider use of this site to help meet the needs for a well-functioning intercity passenger rail station – especially in terms of access, parking, and station siting.

Assuming an improved station at the Depot Street site would require the provision of parking, it appears a parking structure would be needed to address this demand. With a constrained parcel, the only option to build is up rather than out. In addition, the access, placement and capacity of the structure may result in it being located over the operating tracks. The City would be willing to look at this concept – however, we anticipate this site will continue to have cost parameters well above the Fuller Road site when looking at the site access improvement costs and structured parking costs in the EA. These concerns would be avoided by locating the station at Fuller Street.

#### **Proposed strategies to address this concern:**

- *Work with FRA to determine what further analysis is needed to compare the Fuller Road and Depot Street sites.*

#### **Public Comments**

Our understanding of the concern: *FRA expressed that their may be public comments raised during the EA process that have not been addressed.*

In reviewing the past public input received on this project, we identify the following themes:

- Parking – There was some concern raised over the amount of parking suggested to be provided on site. As detailed above, we suggest a revised approach to provide less parking and a more phased approach. We are confident this addresses the concerns raised as it results in a smaller and less impactful Phase 1 project.
- Cost – There was some concern raised over the cost of the project. As detailed above, there are several cost saving measures proposed for consideration.
- Location – There were more comments received expressing support for the Depot Street site and its proximity to downtown. But we disagree that those concerns were unaddressed. When considering the totality of the project, we must weigh all factors in assessing how to best accommodate a new station. Overall, the increased costs, the additional environmental consequences and other factors associated with the Depot Street site continue to point us to the Fuller Road site as the Preferred Alternative. We communicated with many interested parties on this reasoning, were able to win over some who were previously in opposition to support the new location, and we listened intently to others while we finalized a recommendation.

Still, additional language or evidence in coordination with project partners can be added to the project files to articulate these matters. The public engagement campaign that the city previously conducted may be dated at this point, and so an additional engagement may need to be carried out to refresh the public's input and allow for more updated guidance.

**Proposed strategies to address this concern:**

- *Work with FRA to ensure that responses are adequate to address concerns raised during the EA process.*
- *Conduct a new public engagement campaign once a revised approach to the EA is agreed upon.*

I hope you find this framing of the issues helpful. Furthermore, I hope we've captured FRA's concerns adequately. The City looks forward to working collaboratively with FRA to further refine these approaches to achieve the mutually desired outcome of an approved EA and station design. Upon consensus, our objective is to finalize a public review document to advance the Ann Arbor Station NEPA analysis and preliminary design and reach a mutually satisfactory conclusion.

Thank you for your consideration of these matters. I look forward to your response.

Sincerely,



John Fournier  
Assistant City Administrator

CC: Congresswoman Debbie Dingell  
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Kevin Rambosk, Legislative Director, Congresswoman Debbie Dingell  
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