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Huron Valley Group  
Michigan Chapter

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VIA EMAIL

June 2, 2015

Dear Ms. Davis,

I am writing on behalf of the Huron Valley Group of the Sierra Club, based in Ann Arbor. Our organization supports the goal of improving the public transportation systems within our city and region, including improvements to the Ann Arbor Amtrak station. At the same time we firmly support protecting and preserving our parklands and natural features from development for non-park uses. We have followed the process of evaluating a preferred location for a replacement of the Ann Arbor Amtrak Station since 2010. We have participated in the entire series of public meetings regarding progress of the Environmental Assessment process.

At the public update meetings held on May 13, 2015, we were concerned to find that the Purpose and Need Statement had been modified compared to the version provided at the previous meeting in Fall 2014. There had been no opportunity for public input on these changes, so we were dismayed to find the statement being characterized as the final version approved by the FRA. Some of the modifications are misleading at best, and, at worst, prejudice the process against building a new station on the current station site, suggesting a predetermined outcome in advance of the alternatives analysis.

**Our primary concern is that this modified Purpose and Need Statement goes beyond describing the inadequacies of the existing station structures and facilities, to alleging limitations of the location itself that we believe are untrue.** Below are our comments on the needs in the order identified in the final version of the Purpose and Need Statement approved by the FRA:

- *Insufficient Quality and Comfort Provided for Passengers by the Existing Station.* This point we agree with; it is the primary reason for going through this exercise. The station design emerging from this process is supposed to address these needs.

- *Inadequate Space for Intermodal Connectivity at the Existing Station.* This point we agree with in part. The current layout of the station and parking creates access difficulties that would need to be addressed in the design of a new or renovated station and its associated parking. For example, an elevator or the station itself being built over the tracks (which will be needed in any event when a second track is added) would address the current access problems. Likewise, the bus parking access issues exist and are matters to be addressed by the new station design.

Bicycle connectivity, however, is better at the existing depot site than the characterization in the Needs Statement. The Border-to-Border Trail passes under the Broadway Bridge and, thus, reaches the current station parking area without having to cross a major street; access from the parking area to the station would be a matter of the building redesign with elevator access over the tracks, as described above. As the Needs Statement notes, Broadway Street itself is listed on the city Bikeway System Map. It is one of only three bikeways linking the North and South sides of the city, all three of which are congested at peak hours, as might be expected.

- *Substantial Existing and Projected Passenger Demand.* With the projected increase in the number of Amtrak trains per day and the track improvements in process, ridership is likely to increase, supporting the need for more space in the station. Commuter rail service is also a potential source of demand, although perhaps harder to project. For example, according to reports from the University of Michigan (<http://communityrelations.umich.edu>) 41% of UM employees live in or near Ann Arbor and, thus, are more likely to travel to work by car, bus, bicycle or foot rather than by train. The remaining employees travel to Ann Arbor from all directions. A significant number would not be served by an east-west commuter train system.
- *Limited Integration of the Existing Station within Ann Arbor and Limited Access to City Neighborhoods and the Region.* We absolutely disagree with this point as described in the need statement. The concern about “visibility and compelling design” would, of course, be addressed by the design of the new station itself. The assertion that the current location (which is adjacent to the historic Michigan Central station – now the landmark Gandy Dancer restaurant) has limited integration within Ann Arbor is absolutely false and contradicts the majority of the public feedback provided during this entire process. A more detailed city map helps support our position. We have modified the map in Exhibit 1.1 from the needs statement to label the central downtown area and the Lower Town/Wall Street/Kellogg Eye Center area, which are all within easy walking distance of the current station. We note the following examples that point to this location, in fact, being well integrated with the community:
  - The central downtown area is easily accessible via Broadway/Division, 4<sup>th</sup> and 5<sup>th</sup> Avenues, and Main Street, connecting to the City and County Administrative and Court buildings, the Hands-On Museum, Zingerman’s Deli, and other business, commercial, and entertainment sites. One of the interests of the city’s

Downtown Development Authority has been to increase the density of residents living in the downtown area, particularly attracting the young millennial demographic, which favors access to public transit.

- Lower Town is the one area along the entire station study area corridor that is most amenable to transit oriented development for both commercial and residential uses.
- The current station is located close to the Cascades white water kayak run on the river, which is becoming a regional draw for recreation.
- From Depot Street, North Main Street is also easily accessible, with additional potential for development.
- The existing station location benefits from proximity to the M-14 access to the US-23 and I-94 expressways.
- The existing station's long-term parking lot on the north side of the tracks is adjacent to undeveloped private land that abuts the Huron River. The existing station and private owner share the only public access point/driveway to this north-side parcel of land. The private owner, DTE, has stated publicly that they would be open to potential collaboration with the city on their redevelopment plans for this site.

In summary, we believe the latest version of the Statement of Purpose and Need correctly identifies the needs related to the structures and layout of the current station, but incorrectly characterizes the location itself to the point of prejudicing the alternatives analysis for the Environmental Assessment process. Given that part of the process for evaluating the alternatives is to assess how well each alternative addresses the stated needs, it is crucial that the statement of needs present an accurate, not a biased, picture. We ask that the Statement of Purpose and Need be revised to provide a more accurate characterization, or that our concerns be included as part of the official record.

We appreciate your continued vigilance over this process and hope you will take our concerns under consideration.

Sincerely,

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