

Submitted as public comment to the RTD Board Meeting, June 27th, 2023.

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Lynn Guissinger, RTD Board Chair
Regional Transportation District
1660 Blake Street
Denver, CO 80202

**ATTN: 2023 Code of Conduct and Service Suspension Policy Revisions
Declaring June 28th as Ride with Pride Day
Taylor Swift Concerts at Mile High Stadium**

Dear Chair Guissinger,

2023 Code of Conduct and Service Suspension Policy Revisions

Greater Denver Transit notes with some incredulity that, despite an extensive customer, community and employee engagement process which yielded 743 comments, not one change has been made to the proposed Code of Conduct or Suspension Policy, both of which are now being presented to the Board for approval. This naturally raises some concerns about whether RTD harbors a genuine desire to act on the feedback received.

To create the most robust public conversation within our means, RTD Director Ruscha and Greater Denver Transit hosted a focus group on Thursday, June 22nd to review and examine the "Respect the Ride" proposed Code of Conduct. In addition to our urbanist partners connected to the Denver Streets Partnership, we had special guests from the Colorado Coalition for the Homeless (CCH) and American Civil Liberties Union (ACLU) who contributed highly valuable insights. We urge the agency to review the letters these two organizations have sent in under separate cover and revise the proposals accordingly.

While there was wide acknowledgment of the challenges RTD faces in restoring a welcoming environment at Union Station and elsewhere on the system, there was a consensus that two major changes could (a) protect RTD from facing legal repercussions from language that risks selective enforcement and (b) appeal for the resources required to actually implement the code.

First and foremost, ambiguous language remains in place that could result in outcomes of discrimination based on selective enforcement from words or phrases such as "offensive", "demand is high" and "totality of the circumstances" which are wide open to interpretation. We urge the Board to remove such ambiguous language from the entire code, and instead adopt wording specific to antisocial behaviors such as targeted harassment, vandalism, littering, loud music, and drug use (including smoking).

Most concerningly however, the consensus view of the focus group was that the rider experience will be virtually unchanged with the adoption of a new Code of Conduct due to RTD's vastly insufficient mental health, outreach, and behavioral enforcement resources. This leads us to doubt the agency's ability to remove repeat offenders who display aggressive, intimidating, violent and antisocial behaviors which are already prohibited under the current version of the Code of Conduct.

GDT urges a resolution from the Board of Directors and Management addressed specifically at the agency's City and State partners: one that explicitly acknowledges the gap between RTD's ambitions to secure a safe and welcoming transit environment and the reality of their capabilities to address the degraded civic environment surrounding much of the transit system.

We urge that this resolution make specific and measurable requests for support from city partner personnel including the provision of social workers, mental health professionals, addiction specialists and law enforcement to provide a genuine alternative to individuals present on the RTD system because they feel they have no other place to go. RTD's system will not feel meaningfully more safe and welcoming until city partners step up and support their transit agency with the support peer agencies have benefitted from across the country.

Finally, we see the updated Code of Conduct as just one of the many steps that will be required for RTD to undertake in order to truly provide a safe and welcoming transit environment. RTD cannot count on the launch of the new code as something that will meaningfully change rider or operator perceptions about safety and respect aboard RTD; this will require further effort and resources from both inside and outside the agency.

Declaring June 28th as Ride with Pride Day

Greater Denver Transit supports the recommendation by RTD Directors Ruscha, Guzman, and Dishell that the Board of Directors adopt a resolution declaring June 28th as annual "Ride With Pride" day.

However, it is widely acknowledged that the RTD system is a place where members of the LGBTQIA2S+ community are at a higher risk of experiencing targeted aggressive, intimidating, and violent behavior compared to most other spaces in the Greater Denver Metro area.

Because of this, GDT also supports the Board amending the motion to adopt a strong position against aggressive, intimidating and / or violent behavior being targeted at members of the LGBTQIA2S+ community using RTD's services and also the Board resolving to make education and enforcement a priority in accordance with the latest RTD Code of Conduct.

Taylor Swift Concerts at Mile High Stadium

Greater Denver Transit would like to bring to the Board's attention that Friday July 14th & Saturday July 15th are projected to have high ridership demand due to the Taylor Swift concerts being held at Mile High Stadium and the Colorado Rockies hosting the New York Yankees at Coors Field on those dates. In particular the ridership boosts transit agencies have experienced from Taylor Swift fans ("Swifties") have become the subject of numerous stories in the national press.

GDT urges RTD to communicate their plans to handle this demand well in advance, including adding extra cars to E and W Line trains, possibly running limited C Line trains, and the fact that light rail service now runs until 2am at weekends. GDT would also like to make RTD aware that substandard performance on these event days such as canceled trains will show the agency in a poor light when compared to its peers at a national level.

Best Regards,



Richard Bamber
Cofounder, Greater Denver Transit



James Flattum
Cofounder, Greater Denver Transit

CC: RTD Board of Directors
Debra Johnson, RTD General Manager & CEO.