

Submitted as Public Comment to the RTD Board Meeting, March 26th, 2024.

March 25th, 2024

Erik Davidson, RTD Board Chair
Regional Transportation District
1660 Blake Street
Denver, CO 80202

Dear Chair Davidson,

Greater Denver Transit (GDT) would like to respectfully submit public comment on the following five topics:

Northwest Rail Peak Service Feasibility Study Update

GDT is extremely pleased to see RTD making a huge commitment to riders with mobility disabilities by recommending the high-level boarding design for platforms and high-level trains on the future Northwest Rail service.

Senate Bill 24-184 Amend Position

GDT believes that the best way to deliver the long-promised and voter-approved Northwest Rail corridor commuter rail service is in partnership with CDOT and the FRPR District. **There is no part of the bill which explicitly obligates RTD to commit funds**, either for capital expenditures or operations and maintenance, aside from the resources required to participate and cooperate to produce the required implementation plans as part of the partnership.

GDT urges RTD to fully commit to the partnership and handle the question of funding requests from the FasTracks Internal Saving Account (FISA) if or when they come up during the planning process. Having RTD complete a Northwest Peak Service study which ignores proposals to run FRPR Intercity rail services on the same tracks now represents poor value to the taxpayer. A skillfully written and executed change of scope with RTD's consultant HDR is now required from the project team. GDT's view is that the scope changes can be easily completed within a 3-month period if work is distributed across the consultant team.

For the record, GDT also believes it is vital that the FRPR District take reciprocal steps to ensure that their consultant HNTB's Service Development Plan contemplates the future blended commuter and intercity rail service, especially service that exceeds the peak service.

Downtown Rail Intersection Reconstruction Contract Award

GDT welcomes the fact that following discussion and public comment at last month's Board meeting, the Contract worth \$4,320,384, proposed to be awarded to Krische Construction, Inc. is being presented by staff for Board approval. That said, we would like to remind Directors of their fiduciary duties to the public and the need for them to review a complete set of proposed contract documents, which we understand comprises of:

- RTD Request for Proposals and all issued Addenda
- Krische Construction Technical Proposal
- RTD Cost Proposals completed by Krische Construction
- RTD SBE Submissions completed by Krische Construction
- RTD Submissions completed by Krische Construction

Because of this, GDT would like to respectfully ask that Directors who have not had the opportunity to review the complete set of contract documents to vote "no" or abstain on this item.

May 2024 Title VI Service Equity Analysis

GDT is not surprised that the Title VI Service Equity Analysis found that reinstating the Free MetroRide had a potential disparate impact. However we find the conclusion that there are "No practical alternatives to avoid, minimize or mitigate the findings" ([Agenda Packet Page 151](#)) somewhat strange given there are five bus routes (0, 9, 10, 15 and 19) that cover the Free MetroRide's route between Union Station and Civic Center. Clarification regarding the nature of this conclusion is appreciated, particularly in regards to how fares impact the determination of "practical alternatives".

Even if the Free MetroRide's reintroduction is justified on temporary grounds, it should be noted that this route has been judged non-compliant with Title VI policies meaning there is currently no justification to make its reinstatement permanent.

GDT would like to repeat its call to scrap the reintroduction of the Free MetroRide along 18th and 19th streets in favor of extending the 0L from Civic Center to Union Station and redeploying operators on the five existing bus routes which perform the same role between Civic Center and Union Station. The Downtown Rail Reconstruction Project is an opportunity for RTD's regular downtown bus network to be boosted and invested in, and ensure any investments are strategically deployed.

GDT also reasserts our proposal that use of the RTD Free MetroRide equipment should be studied for operation on Blake and Market streets between the Decatur - Federal Station on the W Line and the 38th & Blake Station on the A Line. We believe this would be the best-use of Free MetroRide equipment and operators, as it would address the largest service gap within the Downtown area (connecting Sun Valley, the Auraria Campus, LoDo, Coors Field, Five Points, and RiNo). It would also be one of the most effective methods in providing rail replacement service this summer to address the lost E/W-oriented light rail service in central Downtown and would complement without duplicating the existing 38 and 43 bus routes.

May 2024 Service Change Proposals

GDT welcomes the inclusion of public comment write-ups in the agenda packet, which better communicates the intent and tone of the individual commenters. We are also pleased to see a clear statement on how the Service Development Division has listened to public feedback and altered their proposals accordingly ([Agenda Packet Page 156](#)). GDT hopes these two new improvements in transparency will be permanent. That said, we hope the Service Development Division will address the issue where the public is asked to comment on and the Board is asked to approve proposed service changes without visibility of proposed schedules. While we accept that there is a possibility of changes happening during the run-cutting process, we do not believe that draft schedules should be fully held back as a result of said process.

Regarding the actual proposed service changes, GDT is extremely pleased to see that staff have withdrawn the deeply troubling proposal to end midweek light rail service as early as 10pm. While we understand the initial reasoning for such a proposal was the availability of maintenance windows, to fully ensure the best possible service while maintaining exemplary light rail safety standards we encourage staff to fully review light rail maintenance plans, maintenance-of-way staff availability/coverage, documented safe systems of work and right-of-way access arrangements against industry best practices, taking input from peer agencies and industry experts as appropriate. GDT also urges staff to study the effects of the withdrawal of early morning light rail services, particularly on those who have shift work starting by 6am or airport workers that need to connect on to early morning A Line trains. We hope that in time, some early trains are reinstated or substitute buses are run to ensure that these riders/constituents are able to use transit successfully.

Finally, one service change that is most welcome is the addition of a late night northbound departure on the N Line from Union Station at 11:56pm on Saturday nights. This is incredibly heartening for RTD's prospects in aiding Downtown revival efforts, and we are appreciative of this addition. GDT hopes that additional trains will also be added in the future on Friday nights and then midweek, where riders currently have to make do with a last northbound departure at 10:56pm, to further boost ridership.

To reiterate, we are very pleased at staff's efforts to revise the service changes following public comment, alongside increased transparency; we understand that these changes are often difficult to implement given time constraints, and we thank staff for their diligence whilst furthering public trust in RTD. We also thank the Board for the opportunity to engage and look forward to tomorrow night's meeting. Please do not hesitate to reach out to us with any questions/concerns you may have.

Thanks for all you do,



James Flattum
Greater Denver Transit



Richard Bamber
Greater Denver Transit

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