

**Submitted as Public Comment to the RTD Board Meeting, July 30th, 2024.**

July 30th, 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 topics:

**Light Rail Speed Restrictions (“Slow Zones”)**

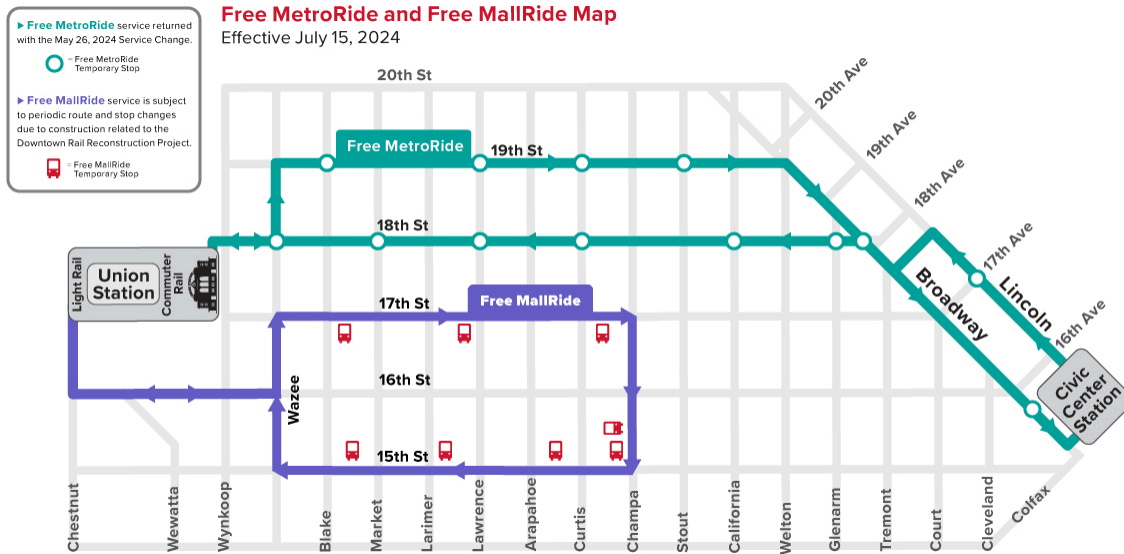
GDT writes regarding the batches of 10 mph “slow zones” on the light rail network. We are appreciative of staff’s efforts to fully answer our questions by email and the creation of a detailed website that aims to explain what is happening in-depth. That said, two familiar issues have reemerged following the discussions and explanations as to why this situation came about. Both (a) the operator shortage and (b) the lack of flexibility around scheduling have been cited as the key reasons why light rail service has been and continues to operate far below acceptable standards.

GDT remains critical of the agency’s current inability to provide schedules that will provide adequate rail service to riders, and we repeat our call for temporary schedules. Coupled with the internal issues highlighted by the recent Organizational Assessment, it is now abundantly clear that a major turnaround plan is needed that will fix the agency’s key underlying issues; in particular, **we call upon the RTD Board to lead a top-to-bottom review of the service planning and scheduling process with the aim to both (a) enable the flexibility needed to publish temporary schedules and (b) modernize the route bidding process for RTD to improve the of work-life balance for operators.**

**Downtown Light Rail Reconstruction Project - Latest Phase**

GDT notes the change in construction phase on Monday, July 15th, on this important project that closes two key grade crossings on 15th Street in Downtown Denver. While the Free MallRide and MetroRide got a dedicated map (pictured below) to explain the changes, riders on all other Downtown bus routes were effectively left to work it out for themselves via service alerts that simply listed which stops were losing service. A key example was the westbound 15L, where there was nothing to indicate the major routing change that skipped most of Downtown altogether and instead remained on Colfax heading directly to the Decatur-Federal Station via the Colfax Viaduct.

While we note the 15th Street detour tool that has since been posted to the website, **GDT urges the Agency to consistently put resources and effort into visual and descriptive information on RTD’s “regular” bus routes in a timely manner alongside special bus routes like the Free MallRide and Free MetroRide.** Not doing so risks alienating riders who use routes that intersect the entire network, and risks prioritizing Downtown riders over the overall health of the network.



## September 2024 Service Changes

GDT notes two alterations to the September 2024 Service Changes that have been made since the public engagement process; namely pushing the changes back from September 15th to the 29th and only restoring the E and H lines to 30-minute frequency. **We urge RTD to continue to be transparent on its website and fully explain the reasons behind these decisions such as if they are related to either the Coping Panels Project, the Downtown Light Rail Reconstruction Project, and/or the light rail speed restrictions.**

It would be remiss of GDT to not point out that when we refer to “15 minute frequency”, we mean per line and not a combined service on a particular corridor.

GDT appreciates the enhanced service information packet, in particular the attempt to publish the public comments received in full (some comments are cut off in the packet), and the expanded public engagement process. We look forward to a dialogue with the service development division regarding other areas where we see opportunities for improvement

GDT has been made aware of the disparity between 2024-5 school year start dates and the delayed RTD service change date which will leave some high school students in the District without seasonal fall / winter levels of service (formerly referred to as “school tripper service”) for as much as 6 weeks this August and September. **GDT calls on RTD to publish a dedicated webpage of fall / winter service that are in effect “school trippers” by educational institutions served. Any plans to mitigate the effect of this late service change, perhaps by starting some fall / winter runs earlier than September 29th, should also be communicated.**

### **Ticket Vending Machine (TVM) Replacement Appropriation**

GDT notes that one of the biggest barriers to those that are either unbanked or do not possess a working smartphone to accessing RTD's latest fare benefits such as fare capping is the requirement to obtain a physical MyRide card via an RTD sales outlet. This is in stark contrast to other transit systems around the U.S. such as L.A. Metro, Chicago CTA and Seattle's Sound Transit (to name but a few) where any rider can purchase a smartcard with either cash or a credit card at any ticket vending machine (TVM) and immediately ride with the full benefits related to fares. **We strongly encourage Directors to ensure the TVM procurement includes the ability for the new TVMs to allow riders to both reload and buy account based ticketing (ABT) smartcards to bring RTD into line with most other major US. transit systems.**

### **Zero Fare for Youth Adoption**

In addition, we understand that there is an agenda item to adopt the continuance of the Zero Fare for Youth Program (along with its related Title VI fare equity analysis). **We strongly encourage Directors ensure the program's continuance, given its ability to spur ridership and encourage youth to build habits around taking transit in their day-to-day lives.**

### **Vision Zero Adoption**

GDT has been notified that there is likely to be some discussion for RTD to adopt Vision Zero principles as part of the agency's strategic planning and wider leadership culture. As a stakeholder in the community-driven process that has led to this, **GDT fully supports the initial recommendations and urges Directors to support the adoption of Vision Zero principles and systems throughout RTD.**

Thanks for all you do,



Richard Bamber

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