

Submitted as Public Comment to the RTD Board Meeting, October 22nd, 2024.

October 22nd, 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”)

Greater Denver Transit (GDT) writes once again with continuing concern regarding the batches of 10 mph “slow zones” that continue to be imposed on the light rail network. These “slow zones” continue to severely affect schedules and therefore rider journeys. GDT remains critical of the apparent “muddle through” approach and we repeat our call for temporary schedules to be introduced. It is clear from the September 2024 service changes that the opportunity to provide riders with accurate information on how long their journeys will take has been completely missed. GDT continues to question the agency’s commitment to its riders as this situation continues into its fifth month.

Vision Zero Resolution

GDT is in full support of RTD adopting 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 Board resolution being presented tonight and we urge all Directors to vote in favor.

Colorado Railroad Accident Investigation Confidentiality Bill

Next year, a bill will be introduced into the Colorado State Legislature that will make light rail accident investigation reports public. This is especially important as it will be key to an open and transparent safety culture that is needed to reduce accidents involving light rail trains and therefore bring RTD into alignment with Vision Zero.

The Railroad Investigative Report Confidentiality Bill will update C.R.S. § 40-18-104 to mandate accident investigation reports are not kept confidential and information is released in a timely manner to the public.

- Colorado currently has the most restrictive statute in the nation governing light rail accident investigation confidentiality.
- Vital information on light rail safety will be available to all who should know about it (e.g. transit industry safety professionals) shortly after an accident or incident occurs.
- The Bill supports open and transparent safety regulation that is proven to reduce accidents and save lives.
- The Bill will be introduced to the Colorado State Legislature in January 2025.

This is a statute change that GDT would be advocating for regardless of RTD's light rail safety record and as such, it should not be seen as a comment on RTD's or the PUC's performance. GDT would like to request that the RTD Directors collectively take a position in support of this Bill by January next year, when it is introduced.

I-25 & Broadway Interchange Pedestrian Path

GDT is concerned that a convenient, direct pedestrian path to I-25 & Broadway station, originally planned as part of the I-25 & Broadway interchange project, appears to have been rejected following feedback by RTD. As GDT understands, the project team (led by DOTI) originally planned a direct, diagonal path from the SW corner of the Ohio & Broadway intersection to the station, passing through a new RTD parking lot and under the new I-25 southbound ramp. We also understand that RTD staff had issues with this path over safety concerns about conflicts between pedestrians, bikes, and parking motorists, and the path was removed from the design.

To replace this, a new, indirect path was placed in the design which crosses 4 lanes of the new highway ramp, rather than avoiding the highway ramp altogether. The new path adds extra distance and safety concerns of conflicts with high-speed vehicles entering the ramp, making it less convenient and less safe for riders coming from Ohio Avenue to access the station.

GDT urges RTD to reconsider and reinstate the original, direct path planned in the project that passes under the new ramp, as GDT feels that RTD should prioritize safe, convenient pedestrian and bicycle access to I-25 & Broadway station. GDT feels safety conflicts between path users and parking motorists are overstated and a reasonable design can be made with a crosswalk across the parking access road, as originally planned, connecting to the already-constructed multi-use path underneath the new ramp. Such a revised design could be one of the agency's first actions that would align with the newly stated "Vision Zero" policies and principles, should that resolution be passed tonight.

Details of the path are shown in **red** as an attachment to this letter.

Consideration of Greyhound Hub at Civic Center Station

GDT writes with concern regarding the news that RTD does not intend to renew Greyhound's contract at Denver Union Station (DUS). We propose that Civic Center Station (CCS) be formally considered as the new Denver hub for Greyhound along with all other privately-operated bus services that currently use the DUS Underground Bus Concourse to expand and preserve capacity for RTD and CDOT bus services at DUS.

The DUS Underground Bus Concourse was designed for short-duration passenger waits of 30 minutes or less, so Greyhound's long distance bus service with multiple-hour-long waits has proven fundamentally incompatible with the design. The waiting experience for Greyhound riders at DUS lacks dignity where insufficient seating regularly results in riders sitting on the floor for hours on end.

Meanwhile, Civic Center Station (CCS) operates as a shadow of its former self following the COVID-19 pandemic and has substantial extra capacity. CCS has a large and under-utilized climate-controlled waiting room that is far more conducive to the longer waits associated with long-distance journeys, and is closer to appropriate facilities such as affordable hotels in the event of cancellations. There is an opportunity to provide at Civic Center the welcoming, dignified, comfortable waiting area Denver needs for long-distance buses. This, in tandem with keeping both DUS and CCS open for sufficient business hours (including the last Route 15 departures and late-running Greyhound services), allows for the necessary balance in keeping riders sheltered in a 'fare-paid area' while accommodating increases in bus capacity necessary for DUS in the future.

While we are open to exploring and discussing options regarding kiosk set up, locations, and other necessary considerations in continuing to provide Greyhound service at DUS (e.g., ticketing stations at Wewatta Pavilion or the Great Hall) we recommend the option that Greyhound and other private bus operators continue to serve DUS via the surface stop at Wewatta Street to accommodate connections with Amtrak and RTD Rail services, but via a CCS hub. The northernmost CCS Gates 1 and 2 at Civic Center are fully covered, and immediately accessible from the CCS Waiting Room without riders needing to go outside.

In summary, a CCS Hub for Greyhound and other private operators offers more capacity at DUS for additional RTD buses, a more dignified waiting experience for Greyhound riders, more affordable food and accommodation options for Greyhound riders, and preserves the ability for Greyhound to connect with DUS without exhausting underground concourse capacity.

Light Rail 30th Anniversary Celebration

GDT thanks RTD staff for the opportunity to run a table at this event and be part of the celebrations for the 30th anniversary of light rail service. While it is true we can be fiercely critical of the agency at times, opportunities to show that we are also big supporters are always welcome and a pleasure to partake in. We hope the agency extends further invites and opportunities to GDT in the future.

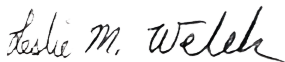
Thanks for all you do,



James Flattum



Richard Bamber



Leslie Welch



Emma Griffin

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

Attachment A - I-25 & Broadway Interchange Pedestrian Path

