

Submitted as Public Comment to the RTD Board Meeting, February 27th, 2024.

February 26th, 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 three topics:

1. Senate Bill 24-032 Support Position

GDT encourages all Directors to vote for a support position on SB24-032 “Methods to Increase Transit Use”. The bill enables four great ways to increase transit ridership in Colorado, including making “Zero Fare for Better Air” an annual event and laying the foundations for a statewide transit pass program. We are excited to see the potential changes that result from this bill, and look forward to resulting improvements in ridership and the rider experience.

2. Downtown Denver Rail Reconstruction Project - Board Oversight

GDT is concerned that this project may not get proper oversight by the RTD Board due to it being incorrectly labeled as a “routine procurement” and “repair and maintenance of rail infrastructure” ([Agenda Packet Page 114](#)), meaning it is eligible to skip Board approval under [Section B\(2\) of Resolution No. 010 \(Delegation of Authority and Competitive Selection\)](#), passed by the Board in October 2022. A project that requires a request for proposal process, the hiring of a program management support consultant and has bespoke design / “issued for bid” drawings should be considered anything but a “routine procurement” that does not require Board approval. Secondly, this whole program of work has been developed following PUC enforcement action and “emergency rail replacement” requirements, not as part of a routine repair and maintenance and schedule, which would typically include tasks such as resurfacing the rails and repairing patches of cracked concrete. The current proposal differs significantly from what most would consider “routine procurement”, and it should be noted that RTD’s own words on the project are “This is the first time the agency will undertake a major reconstruction project of this nature” ([Agenda Packet Page 106](#)). This wording indicates that this project should receive significantly more oversight than is currently proposed.

GDT strongly urges the Board to carry out the oversight role entrusted to them by the public, and reject all interpretations from RTD staff that this project is “routine procurement” or simply “repair and maintenance”. The Board should insist on full visibility and approval rights on all related contracts the GM & CEO wishes to enter into, especially for a major project such as this one.

3. MetroRide and Service Change Concerns:

When considering the Downtown Denver Rail Reconstruction Project combined with the 16th Street Mall Project, the state of transit in Downtown Denver this summer is set to be the most disrupted it has ever been since the Light Rail system was first being built in the early 1990's. [31% of Downtown offices are sitting vacant](#) at the start of this year (not even accounting for leased, but unused space which delivers an effective vacancy number well over 50%), along with pedestrian traffic heavily disrupted by construction on the 16th Street Mall. Given these factors, it is all the more vital that RTD provide robust information about how they will provide responsive services to current ridership and population trends in Downtown Denver. The current information provided regarding service changes is leading us to have concerns regarding successful execution of services during this time.

As such, GDT requests more details behind the changes in bus operations and routing through Downtown Denver connected with the Downtown Denver Rail Reconstruction Project. Namely, GDT requests additional information about the planned resumption of the RTD Free MetroRide Bus at the expense of Free MallRide frequencies:

1. Why is the Free MetroRide being brought back, and what is the underlying logic for bringing it back at this point in time specifically?
2. Is the Free MetroRide returning (a) just for the duration of the Light Rail service suspension on the Central Downtown Loop, (b) the remainder of the MallRide's detour, or (c) is it being brought back to stay per the System Optimization Plan (SOP)?
3. What is the exact span of service hours (e.g. is it 6am - 6pm)?

Why the Free MetroRide is a Wasteful Use of Operators:

The resumption of the RTD Free MetroRide as currently presented would be a misappropriation of scarce operators on a route (Denver Union Station to Civic Center) that already benefits from the highest frequency of bus services on the system. Even if the MetroRide's new hours of operation are extended beyond their previous peak-only configuration, the route over 19th Street (one of Downtown's least-dense and lowest-demand north/south streets) will limit ridership, and it is very possible that many of the intended transit riders who would be catching the bus from central Downtown may completely ignore the route as 19th has not hosted any local transit in nearly 4 years.

The Free MetroRide was a peak-only Downtown circulator bus for commuters that operated in Downtown Denver connecting Union Station with Civic Center from 2014 until March 2020. The service was created **not** to increase service in eastern Downtown (which would have been operated all day if it had), but was explicitly designed for commuters in response to the closure of the old Market Street bus station and opening of Denver Union Station (DUS) as Downtown Denver's premier public transit hub in 2014. The reasoning at the time was that downtown office workers, arriving by bus or on one of the new commuter rail lines, would increase demand on the existing Free MallRide to a point where a second circulator bus service was required. The route alignment operated was atypical in that it connected Union Station and Civic Center not via 15th and 17th Streets, which have hosted the bulk of Downtown's bus services for decades, but via dedicated stops on 18th Street for northbound and the much lower-density, less-utilized 19th Street for southbound trips that are not shared with any other buses.

Even when the service was opened in 2014, the case for a second parallel circulator was shaky as RTD runs buses every few minutes up 15th & 17th Streets, which are available to regular commuters at no extra cost due to them already having paid fares to commute into Downtown Denver. The case for a second circulator is now virtually non-existent due to ridership stubbornly remaining at 2/3rds of what it was pre-pandemic and is not likely to rebound quickly in the foreseeable future due to the phenomenal increase in employees working from home. Currently, the vacancy rate for Downtown Denver offices is 31% compared to 16% pre-pandemic, meaning a proposal to reinstate a commuter-focused route is all the more out of touch with today's reality.

In light of these realities, GDT is especially dismayed to read that RTD plans to take operators from the Free MallRide and reduce frequency on that route to a distinctly unfriendly 10 minutes. Many people use the Free MallRide due to it being simple to understand, having a large span of service and being historically hyper-frequent. A quick glance up the street usually locates a big red vehicle approaching and the reassurance you will be on your way within a couple of minutes. This route has already been severely cut, with any more cuts risk making it unusable and disproportionately harming the agency's reputation with tourists and non-frequent RTD users.

Branding and information resources would be far better-used to promote RTD's existing and highly-frequent service between Denver Union Station and Civic Center which is not widely-recognized. Since the Free MetroRide last ran, the Denver Department of Transportation and Infrastructure (DOTI) has upgraded the bus lanes along 15th and 17th Streets and RTD has introduced a new "tap to ride" fare system that enables transfers to be effortlessly achieved. With investment in large, new information displays at Union Station and Civic Center, it is easier than ever to use bus routes 0, 9, 10, 15, and 19 to traverse Downtown Denver, given their very high combined frequency. We believe these investments reduce commuter confusion, and serve to increase ease of use of the existing bus system without implementing a service that 1) is unlikely to make a substantive impact, given the relative lack of commuters to Downtown Denver and 2) would divert valuable resources from current RTD services and potentially hamper investment into newer, more robust and responsive services.

If a new route is being considered to help balance service in Downtown during the light rail outage, the lack of east/west service is far more important with service along Blake/Market and Welton in need of more consideration. GDT has previously shared its "[Downtown Bus Plan](#)", which advocates for a streamlining of regular bus service along 15th & 17th Streets, rerouting of a portion of DUS-bound service to 18th Street and consolidating the dangerous and difficult to use "X, Y, Z" stops downtown. The plan also details a genuinely useful way the existing fleet of 12 Free MetroRide New Flyer XD60 buses could be put to use as an east/west circulator service running along Blake / Market from the 38th / Blake Station to Federal-Decatur Station, what is today the largest service gap in the Downtown area. As well as providing a much-needed addition to Downtown Denver's bus network, this would also have the added short-term benefit of actually alleviating the effects of the E/W rail reconstruction project mentioned earlier for rail riders transferring to traverse downtown.

We urge Directors to stop this inefficient use of RTD's resources and taxpayers' money and only approve the May 2024 Service Changes if the proposal to reinstate the Free MetroRide is either removed, or comes back as a temporary measure operated only until the Central Downtown Light Rail service resumes or the detour of the MallRide off of 16th Street finally ends. If implemented as such, we urge for the provision of all-day services to ensure meaningful ridership, and clear navigation and directions to orient riders who may be unfamiliar with the service (given its 4-year absence).

We thank you for reading our letter, and we look forward to continued collaboration in improving RTD services.

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.