

**Submitted as Public Comment to the RTD Board Meeting, July 29th, 2025**

July 29th, 2025

Julian Bouquet, RTD Board Chair  
Regional Transportation District  
1660 Blake Street  
Denver, CO 80202

Dear Chair Bouquet,

Greater Denver Transit (GDT) writes regarding the following topics:

**August 2025 Service Changes**

GDT thanks the Board Office for including our letter regarding the service changes, dated June 14th, 2025 in the Agenda Packet. It can be found on page 256.

**2026 GM-CEO Short-term Goals**

GDT is pleased to note the amendments made to the goals since they were first suggested by the GM & CEO. The goals as they presently stand are well-rounded and a marked improvement over the previous set of goals. However, we are of the view that further tweaks would make the goals more robust.

- Goal 1 addresses customer satisfaction, and **GDT urges the Board to limit the analyzed and reported results for this survey and all future community surveys to respondents who ride RTD at least once per month or more.** As we are evaluating the success of the General Manager & CEO in directing the agency's quality of service, the results on how RTD is doing should be framed only by those who have direct, recent, and regular experience with the system. That being said, we are pleased to see the addition of a "mystery transit customer program" which we hope will provide a better on-the-ground evaluation of the rider experience.
- Goal 2 addresses a 3% ridership growth target, and GDT urges that this target is out of touch with YoY growth drivers, and is inappropriately small. The purpose of RTD is to provide useful public mobility, for which ridership is the most meaningful indicator; we acknowledge that the metric does lag actual service improvements, however this lag is still contained within the overall evaluation period of the goal. **Instead, we would urge the adoption of at least a 5% or higher YoY growth in network ridership.** Additional reward for the GM & CEO on top of a base salary should depend on successfully putting the RTD agency back on a ridership growth trajectory after the post-pandemic recovery has stalled over the past two years. On a year-over-year basis, ridership beyond 10/01/2025 will be compared to a highly depressed prior-year period where light rail ridership was heavily impacted by more severe disruptions than anticipated for the next fiscal period. The core criticism is that achieving a 3% ridership growth comes entirely from a less-disrupted light rail service alone, and this should not require any new action by the GM & CEO over the coming year. Meanwhile, one of the primary reasons for the conservative ridership growth goal during the last goal period was that the budget had already been set leaving little leeway for the GM/CEO to try different strategies to improve ridership. However, since these goals are being set before the budget, a more ambitious ridership target should be easier to achieve.

- Goal 3: The first part of the goal relating to rail reconstruction work is too narrow to reflect the broader state of the agency. While we encourage the Board to devise a more suitable goal related to the overall state of the agency's Capital Programs division for next year including the publishing of a Capital Investment Program (CIP) book with much-needed project visibility requested in earlier letters, a simple but separate target for this year should be brought in as a replacement. Instead for this year, **GDT recommends replacing this target with another that addresses RTD's #1 operational deficiency: the persistent light rail operator shortage causing continued train cancellations and negatively impacting customer perceptions.** This problem needs to (and can) be mitigated within the goal evaluation period - we propose replacing Goal #3 with a new goal that specifies 97% or better full time + part time light rail operator headcount vs. budget as of July 2025. Additionally, bus operator headcount must be maintained as-is - near 100% of budget.

### Approval of Contracts Without Proper Oversight

GDT is disappointed to note tonight's unanimous consent agenda contains over \$136M worth of contracts for approval for which the Directors have not been provided basic documentation with sufficient detail (e.g. line by line cost breakdowns, actual costs of similar projects to determine risk of overruns) to make a truly independent judgement on whether or not a contract provides good value for the agency. This lack of basic detail is a fundamental hindrance to the Board's function.

GDT urges the RTD Board to take swift action to direct staff to begin providing the level of detail needed for the Board to provide its oversight.

### Access-on-Demand Program Modifications

GDT urges RTD not to outright cut the Access-on-Demand (AoD) program, and consider more robust alternatives that concurrently modernize the offerings from both the Access-a-Ride (AaR) and AoD programs in tandem to meet the needs of RTD's riders with disabilities.

GDT also notes the apparent shift in scope of the 'Paratransit Peer Review' from a comprehensive review of the agency's paratransit services to one that only focuses on the AoD service. We refer to a memo to the RTD Board, written on Aug 21st, 2024 where GM & CEO Johnson writes:

*"On Tuesday, February 27, 2024, I commissioned a peer review of RTD's paratransit service delivery, to be conducted by subject-matter experts. APTA convened the peer review panel, which included a geographical representation of panelists from across the country. During the course of the months-long thorough review, the panelists leveraged their expertise and professional experience to assess both RTD's Access-a-Ride (AaR) service, the agency's complementary American with Disabilities Act (ADA) paratransit service, and RTD's Access-onDemand (AoD) premium supplemental paratransit service."*

GDT is curious as to why the majority of RTD's efforts have focused on studying and reducing the costs from approx. \$15M to \$10M per year of the popular AoD program which now carries the bulk of eligible ADA customers. This is in contrast to the AaR program which has been reported as costing RTD over \$60 per trip (compared to AoD's \$25), is roundly criticized by ADA customers and advocates for its shortcomings, and yet has so far escaped major attention directed toward the way it operates, despite it clearly being involved in the Paratransit Peer Review.

**Recognition of Reverend Wade Blank via Honorary Name for Civic Center Station**

GDT is in full support of RTD's proposals to implement this honorary name change for Civic Center Station. We are pleased to see 'Civic Center Station' remain part of the new name, which will minimize confusion for customers.

Thanks for all you do,



James Flattum



Richard Bamber



Emma Griffin



Joe Meyer



Keith Brooks

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