

**Submitted as Public Comment to the  
RTD Operations, Safety and Security Committee Meeting, September 10th, 2025.**

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Ian Harwick  
Operations, Safety and Security Committee Chair  
Regional Transportation District (RTD)  
1660 Blake Street  
Denver, CO 80202

Dear Chair Harwick,

**Access-on-Demand Program Modifications**

RTD's Paratransit program is a lifeline for riders whose disability prevents them from using traditional transit. GDT remains extremely 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 is predicted to cost \$53.4M in 2026, is roundly criticized by ADA customers and advocates for its shortcomings, and yet disappointingly, has so far escaped major attention directed toward the way it operates, despite it clearly being involved in the Paratransit Peer Review.

GDT would like to question why in the Memorandum sent by GM & CEO Johnson on August 29th, an apparently new and fiscally unapproved practice of using RTD owned wheelchair accessible vehicles (WAVS) to provide AoD service has emerged which suddenly adds approx. \$12-15M and effectively doubles the costs of the AoD program. We urge Directors to ask searching questions of staff as to why this important piece of operational and financial information was withheld for so long.

As it appears now possible to provide a "WAV-on-Demand" service, with RTD fully accessible vehicles using the 21st century "on-the-fly" dispatching technology that powers AoD, major improvements should be possible to AaR that eliminate many of the long waits, long journey times and requirements to book in advance. This is precisely the sort of scope the Paratransit Peer Review should have looked at, rather than wasting everyone's time tinkering with the service that generally worked well.

GDT acknowledges that RTD's Access-a-Ride (AaR) program is subject to many Federal requirements, but has found nothing in the DOT/FTA Guidance prevents modernizing AaR with modern dispatching technology to improve service up to the level provided by AoD. In time this could and should lead to a single, combined Paratransit offering, which offers the entire Disabled Community a high level of service.

GDT absolutely deplores the 'scare tactics' being used in the Memorandum of August 29th, that implies that if cuts are not made to AoD, service cuts to some of RTD's most popular fixed-bus routes will be necessary. As a group that is mainly composed of able-bodied transit advocates, GDT has taken the decision to firmly join the Disability Community on this issue, despite the implied threats to cut the transit services that GDT members primarily use. Once again, why does the agency obsess over cutting things that are popular?

It is clear that the Board of Directors needs to step in and take full responsibility for righting this sham of a Paratransit Peer Review, and commission a genuine study on how 21st century dispatching technology can be provided for AaR to improve its objectively poor service product. Only after this is done, will it be possible to provide expected costs for the entire ongoing Paratransit program and submit financial figures for approval.

In addition, GDT fully supports the Disabled Community in calling for RTD to:

- Commit to a Paratransit impact study, independent of RTD, for future analyses that incorporates both financial efficiency and equity impacts.
- Publish corrected AoD and AaR trip data, broken out by month and by mobility aid use.
- Provide a clear accounting of "WAV-on-Demand" service, separate from AoD and AaR.
- Withdraw or revise any projections based on unrealistic perpetual growth assumptions.
- Retain or improve for customers all current aspects of Access on Demand, meaning no change in fares, subsidies, trip caps, service hours, or service areas.
- Reinstate the multi-stop option as a cost-savings measure.

Thanks for all you do,



James Flattum



Richard Bamber



Emma Griffin



Joe Meyer

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