



INFORMATION ITEM MEMORANDUM

To: Mayor and Members of Council

From: Nuria Rivera-Vandermyde, City Manager
Chris Meschuk, Deputy City Manager
Erika Vandenbrande, Director, Transportation & Mobility
Natalie Stiffler, Deputy Director, Transportation & Mobility
Valerie Watson, Transportation Planning Manager
Danny O'Connor, Principal Transportation Planner/Transit Program Manager

Date: March 15, 2022

Subject: Information Item: Update on RTD Draft System Optimization Plan

EXECUTIVE SUMMARY

The Regional Transportation District (RTD) is developing a System Optimization Plan (SOP) to define RTD's bus route network and service levels for the next five years from 2022 to 2027. The draft SOP recommends restoring service for some routes that have been suspended during the COVID-19 pandemic, consolidating or discontinuing others, and expanding certain routes to improve service coverage and offerings.

As currently drafted, the SOP indicates total annual service hours for routes serving Boulder will be restored to approximately 80% of pre-pandemic 2019 levels, falling short of the RTD district average planned for 85%. Six (6) of the twenty-four (24) routes that operated in Boulder are planned to be permanently discontinued or consolidated into other services, and there are critical transit markets in Boulder slated for diminished services and reduced transit options.

City staff has been actively tracking SOP development and recommendations for bus services in Boulder, promoting public input opportunities, and sharing community concerns with RTD. RTD's public input period for the SOP is scheduled through March 9, 2022. Plan refinement is expected in the upcoming months, with RTD Board of Directors approval of a refined SOP anticipated as soon as May 2022.

FISCAL IMPACT

None.

COMMUNITY SUSTAINABILITY ASSESSMENTS AND IMPACTS

- **Economic:** RTD's SOP proposes reduced bus service levels and fewer route options in Boulder over at least the next five years, resulting in less attractive transit options to access jobs and educational opportunities in Boulder and across the region. Diminished service levels will also negatively impact the economic vitality of areas, corridors, and markets that have been planned for and previously benefitted from robust and frequent bus service.
- **Environmental:** RTD's SOP recommendations include fewer and decreased regional bus route options serving Boulder, and this will challenge local and regional efforts to reduce vehicle miles traveled (VMT), greenhouse gas (GHG) emissions, and modal share through 2027 and beyond.
- **Social:** RTD's SOP route recommendations will result in diminished bus transit services and mobility options in local residential and employment areas where diverse and vulnerable populations rely on transit to access jobs, school, medical and social services, retail, recreation, and other opportunities.

BACKGROUND

The Regional Transportation District (RTD) is in the process of developing its draft System Optimization Plan (SOP) that will establish bus route service levels for the next five years (2022-2027). Considering RTD's near-term challenging financial outlook and limited labor force, the SOP is being developed to restore district-wide average service levels to 85% of pre-pandemic 2019 levels. RTD's current COVID-19 service plan is providing approximately 70% of 2019 levels. Since the COVID-19 service plan took effect in April 2020, RTD routes have been operating with significantly diminished service levels, and many routes remain indefinitely suspended.

The SOP is intended to improve RTD bus route service efficiencies and reliability through streamlining routes, standardizing schedules, decreasing, or eliminating less-used services, and reallocating service hours to routes and market areas of greatest need and demand. Consequently, not all routes that operated in 2019 or routes that remain indefinitely suspended are planned to return. Not all geographic markets, including Boulder, will see service levels return to the 85% of pre-pandemic levels prescribed for the entire RTD service area; some markets will see more than 85% and some will see less, as service hours will be reallocated from outlying and suburban markets to urban markets as a function of RTD's equity policy.

RTD released the draft SOP for public comment in January and accepted public comments through Wednesday, March 9, 2022. The SOP recommendations and submitted public comments can be reviewed through an interactive GIS map on RTD's website at the following link: [Social Pinpoint | Reimagine RTD \(mysocialpinpoint.com\)](https://mysocialpinpoint.com).

RTD plans to refine and finalize the SOP in the upcoming months, with RTD Board of Directors plan approval possible as early as May 2022. Related service changes could take effect later in 2022 dependent upon RTD's financial and labor resources.

ANALYSIS

City staff review of the draft SOP route proposals indicates that service hours for routes serving Boulder are planned to be approximately 80% of pre-pandemic 2019 levels, falling short of the district-wide average of 85%. [Planned service changes for the twenty-four \(24\) routes that have served Boulder are summarized as follows:](#)

Routes Being Restored That Have Been Suspended Since April 2020

- Route FF2 – Flatiron Flyer 2 – Downtown Boulder Station/Union Station - Express
- Route FF4 – Flatiron Flyer 4 – Boulder Junction/Civic Center Station
- Route GS – Golden/Boulder

Routes Being Expanded

- Route BOLT – Boulder/Longmont: Expanded service and new routing to CU East Campus
- Route DASH – Boulder/Lafayette via Louisville: Expanded frequencies and additional coverage in Lafayette
- Route JUMP X: New express route between Boulder and Lafayette
- Route 208 – Iris Avenue/Valmont Road/Flatiron: Expanded service
- Route 225/225T – Boulder/Lafayette/Erie: Expanded service to/from Erie

Routes With No Changes from Current Service

- Route FF1 – Flatiron Flyer 1 – Downtown Boulder Station/Union Station
- Route FF5 – Flatiron Flyer 5 – Downtown Boulder Station/Anschutz
- AB1 – Boulder/Denver International Airport
- Route NB – Nederland/Boulder
- Route BOUND – 30th Street
- Route SKIP – Broadway
- Route 204 – Table Mesa/Moorhead/N. 19th Street

Routes Being Discontinued

- Route FF6 – Flatiron Flyer 6 – Boulder Junction/Union Station
- AB2 – Boulder Junction/Denver International Airport
- Route J – Longmont/East Boulder/CU: Discontinue; consolidate service with BOLT
- Route Y- Lyons/Boulder
- Route 209 – CU/Thunderbird/Mohawk
- Route 236 – Boulder Junction/Table Mesa Park-and-Ride

Routes with Segments Being Discontinued

- Route JUMP: Discontinued segment to/from Erie to be replaced by Route 225 and reduced service hours; remainder of route alignment unchanged

- Route 205 – 28th Street/Gunbarrel: Discontinued segment to/from Heatherwood (Lookout Road/75th Street) to be replaced with on-demand service; remainder of route unchanged
- Route 206 – Fairview/Flatiron: Discontinued segment to/from Boulder Junction; remainder of route unchanged

Public Comment Themes on the Draft SOP Recommendations for Routes Serving Boulder

The city's Communication & Engagement Department has been publicizing the SOP and public input opportunities through its [newsroom](#), social media channels ([Twitter](#) and [Facebook](#)), and [Community Connectors program](#). Public comments posted on the SOP web-based interactive map include several comments specific to proposals for routes serving Boulder, many of which impact travel options for communities of concern. Main comment themes as of Tuesday, March 8, 2022, include the following:

- Concerns about the lack of services planned for Boulder Junction
- Concerns about decreased services in East Boulder, including decreased Route JUMP local services via Arapahoe Avenue/CO 7 and the loss of JUMP service between Boulder and Erie
- Concerns about service levels planned for CU's East Campus
 - Requests for direct service options between Denver and CU's East Campus via 28th Street/US 36 to be restored as previously provided by Flatiron Flyer 6
- Concerns about Route #205 plans serving Gunbarrel
- Concerns about transit options for multifamily dwellings in North Boulder
- Requests for direct service options between East Boulder and CU's Main Campus
- Requests for improved Route AB – Airport/Boulder service

Staff Technical Comments Provided to RTD

RTD solicited technical comments on the draft SOP from local agency partners by January 21, 2022, and city staff responded with a formal letter (Attachment 1). A summary of city staff's comments provided to RTD follows:

- SOP proposals calling for the restoration of Routes Flatiron Flyer 2, Flatiron Flyer 4, and GS Golden/Boulder and expanded service for the BOLT route in preparation for CO-119 BRT launch are positives and responsive to community needs and recurring public requests in Boulder.
- City staff's primary concerns with the draft SOP center on revisiting route proposal options to better serve the Boulder Junction, East Boulder, and University of Colorado Boulder transit markets where route services remain suspended and diminished due to the RTD COVID-19 Service Plan currently in effect. City staff offered to partner with RTD staff in revisiting SOP recommendations for these markets and collaborating on alternate service plans.
- Request for the SOP to revisit service design options at the Boulder Junction Transit Center and to revise proposals to include meaningful restorations and enhanced new connections for local and regional bus service options. The draft plan does not purposely

reactivate transit services at the Boulder Junction Transit Center. Reinstating route services at the Boulder Junction Transit Center has been a repeated, high-priority request from many riders and the City of Boulder since all routes serving Boulder Junction were indefinitely suspended with the RTD COVID-19 Service Plan implemented in April 2020. In 2019, five (5) RTD regional and local routes – Routes AB2, FF4, FF6, 206, and 236 – operated at the Boulder Junction Transit Center. The SOP proposes the return of only one (1) route, Route FF4. Route FF4 is planned to return with 38% less service hours than when it operated in 2019.

- Request for the SOP proposal for JUMP route services be revisited and improved to better serve this important transit corridor and to continue momentum for planned CO-7 BRT services. The JUMP route is a critical service connecting Downtown Boulder Station, CU's East Campus, East Boulder, Erie, and Lafayette via Arapahoe Avenue/CO-7. Review of the proposed service hours indicates that the JUMP route will have 47% less service hours than in 2019, and service to and from Erie will also be discontinued. The proposed decreased service levels for the JUMP route are of significant concern considering the critical mobility needs, limited transit options, and transit markets along the corridor and especially in East Boulder. Demographic analysis indicates that the JUMP serves a corridor with a high propensity for transit need: 28% of population living within ¼-mile of the JUMP route are minority, 22% are low-income, and 53% work in essential jobs. Furthermore, reducing service on the JUMP conflicts with collaborative regional efforts underway to fund and launch CO-7 BRT services on Arapahoe Avenue.
- Request for SOP efforts to holistically revisit service options to CU's Main and East Campuses. Both campuses saw significant transit service reductions with the RTD COVID-19 Service Plan, and the draft SOP does not fully restore or significantly enhance services in campus areas impacted by the pandemic service reductions.

Prior to the pandemic, CU's East Campus was previously served by five (5) RTD routes (Routes 209, J, FF6, JUMP, and BOUND). All but the JUMP and BOUND routes have been suspended with the RTD COVID-19 Service Plan. The draft SOP recommends only the BOUND, a diminished JUMP, and an expanded BOLT serve East Campus. Critical Flatiron Flyer 6 service to Denver and Route 209 connections to campus neighborhoods are planned for discontinuation.

Service to the east side of CU's Main Campus via 28th Street/US 36 remains suspended due to the COVID-19 Service Plan. Routes FF4, FF6, AB2, and 236 operating out of Boulder Junction previously provided service along this important gateway to CU's Main Campus, and only the FF4 with reduced services is planned to return to this corridor per the SOP recommendations.

- Concerns about the compressed timeframe and limited mechanisms for soliciting SOP public input ahead of final plan development and RTD Board adoption were also raised with a request for the public input process to be extended and include expanded public information materials and mediums.

Northwest Mayors & Commissioners Coalition (MCC) Comments provided to RTD

The Northwest Mayors & Commissioners Coalition, also known as the MCC, provided formal comments to RTD on the SOP on February 9, 2022 (Attachment 2). MCC members include elected officials representing Boulder County, City of Boulder, City and County of Broomfield, City of Lafayette, City of Longmont, City of Louisville, City of Westminster, Town of Erie, and Town of Superior. Key concerns and requests raised in the MCC letter, which are regional in scope, include the following:

- The SOP must be analyzed for its GHG emissions and brought into alignment with the ridership and reduction targets that are required to achieve the state's GHG rule and the nonattainment air quality goals. The levels of service in the SOP need to be modeled against the baseline assumptions for transit in our region to determine whether additional measures will be needed.
- The service frequencies in the proposed SOP appear to be greatly reduced, to the point that it will hinder many people from effectively relying on transit. A minimum level of service is needed for people to be able to see transit as a reliable transportation option.
- There appears to be a lack of cohesion with major regional planning efforts. The SOP is inconsistent with the 2014 RTD North Area Mobility Study (NAMS) and the 2019 RTD Bus Rapid Transit Study. The NAMS corridors are envisioned to be the multimodal corridors that connect the DRCOG Metro Vision Urban Centers in the northwest, where communities have committed to focusing local development growth in residential and employment. CDOT Region 1 and Region 4 have also committed significant funding to several NAMS corridors to support multimodal transportation in the CDOT 10-Year Plan Project Pipeline. It is requested that the corresponding existing transit service in the SOP explicitly acknowledge NAMS's plans for their future and establish a plan for how these routes' service patterns will evolve into BRT service in the coming years.
- The SOP does not reflect incremental service changes in accordance with the planned BRT service along the CO 7 corridor between Boulder and Brighton. At a minimum, the plan should revisit the drastic 47% reduction in service hours for the JUMP route and should show connectivity to the CDOT I-25/CO 7 transit stop improvements planned to be constructed in 2023 and opened in 2024.
- Concerns about the compressed timeframe and limited mediums for reaching customers and collecting broad public input were raised with request for the public input period to be extended with expanded engagement options. Concerns about the lack of a phasing plan for the SOP recommendations to inform customers of their transit service options and expectations were also noted.

NEXT STEPS

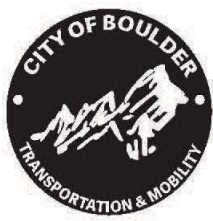
City staff continues to actively track SOP development, assess potential service impacts in Boulder, promote RTD's public input opportunities, and monitor and convey local and regional concerns and plan requests to RTD as the plan is being refined. Staff also continues to seek partnership opportunities with RTD staff to revisit the draft plan recommendations and

collaborate on alternative service plans that will better serve the Boulder Junction, East Boulder, and CU Boulder markets and critical regional connections.

ATTACHMENTS

Attachment A - Letter - City of Boulder to RTD, Technical Comments on the Draft System Optimization Plan, January 21, 2022

Attachment B - Letter - Northwest Mayors & Commissioners Coalition (MCC) to RTD, System Optimization Plan comments, February 9, 2022



City of Boulder Transportation & Mobility

January 21, 2022

Debra Johnson, General Manager and Chief Executive Officer
Regional Transportation District
1660 Blake Street
Denver, CO 80202

RE: City of Boulder technical comments on RTD Draft System Optimization Plan (SOP)

Dear Ms. Johnson,

The City of Boulder very much values our continued partnership with RTD and appreciates your invitation to include us as part of the technical review process for the Reimagine RTD System Optimization Plan (SOP). Thank you for allowing additional time for our staff to fully review the draft SOP and offer technical comments on its content and recommendations.

We acknowledge the unprecedented challenges the SOP seeks to address, and that all municipalities in the region will see changes that are necessary to ensure the continued evolution and success of the transit system. We also appreciate RTD's efforts to include Boulder staff in the development of the draft SOP on a constrained timeline. We commend RTD's dedicated attention to addressing and balancing transit needs across the district and in Boulder through the development of the plan. SOP proposals calling for the restoration of Routes Flatiron Flyer 2, Flatiron Flyer 4, and GS Golden/Boulder as well as expanded service for the BOLT route in preparation for CO-119 BRT launch are especially appreciated and responsive to community needs and public requests in Boulder.

To continue our collaboration, we wish to highlight specific SOP proposal concerns and related opportunities for continued collaboration to inform SOP final refinement in advance of expected March 2022 RTD Board adoption of the plan. As the SOP affirms, Boulder has strong transit demand with many important activity generators and distinctive transit markets. Our primary concerns with the draft SOP center on revisiting route proposal options to better serve the Boulder Junction, East Boulder, and University of Colorado Boulder transit markets where route services remain suspended and diminished due to the RTD COVID-19 Service Plan currently in effect. We also have concerns about the current timeframe and mechanisms for soliciting related public input to allow for further plan refinement ahead of Board adoption.

Following are our primary concerns and requests with the draft SOP:

1. The draft plan does not purposely reactivate transit services at the Boulder Junction Transit Center.

Reinstating route services at the Boulder Junction Transit Center has been a repeated, high-priority request from many riders and the City of Boulder since all routes serving Boulder Junction were indefinitely suspended with the RTD COVID-19 Service Plan implemented in April 2020. In 2019, five (5) RTD regional and local routes – Routes AB2, FF4, FF6, 206, and 236 – operated at the Boulder Junction Transit Center. The SOP proposes the return of only one (1) route, Route FF4. Route FF4 is planned to return with 38% less service hours than when it operated in 2019.

We are very concerned by the lack of SOP proposals to reactivate transit services at the Boulder Junction Transit Center with both service restorations and new service design options. Significant RTD and city partnership efforts and funding, along with sizable private sector investments, have been committed to build the transit center and the surrounding TOD featuring more than 300 affordable housing units with more planned and in development. RTD routes serving Boulder Junction also previously provided critical connections to the large Twenty Ninth Street Mall, surrounding commercial and office areas, the Flatirons Park master-planned business park in East Boulder, and CU Boulder's Main and East Campuses. We request further dialogue on how those services can be restored and enhanced through the SOP recommendations.

We ask that the SOP revisit service design options at the Boulder Junction Transit Center and to revise proposals to include meaningful restorations and enhanced new connections for local and regional bus service options.

2. The draft plan proposes reduced service hours for the JUMP route operating on Arapahoe Avenue/CO-7 and serving East Boulder and other Boulder County communities of concern.

Review of the proposed service hours indicates that the JUMP route will have 47% less service hours than in 2019 and that service to and from Erie will also be discontinued.

The JUMP route is a critical service connecting Downtown Boulder Station, CU's East Campus, East Boulder, Erie, and Lafayette via Arapahoe Avenue/CO-7. We find the proposed decreased service levels for the JUMP route of significant concern considering the critical mobility needs, limited transit options, and transit markets along the corridor and especially in East Boulder. Demographic analysis indicates that the JUMP serves a corridor with a high propensity for transit need: 28% of population living within ¼-mile of the JUMP route are minority, 22% are low-income, and 53% work in essential jobs.

Furthermore, reducing service on the JUMP conflicts with collaborative regional efforts underway to fund and launch CO-7 BRT services on Arapahoe Avenue. This is also contrary

to the SOP proposal to bolster BOLT service on CO-119 in preparation of funding and launching BRT services.

We request that the SOP proposal for JUMP services be revisited and improved to better serve this important transit corridor and to continue momentum for planned CO-7 BRT services.

3. The draft plan overlooks addressing diminished services to CU's Main and East Campuses that occurred with the COVID-19 Service Plan.

CU Boulder features a student body of 35,000 and faculty and staff of 10,000, all with EcoPasses paid by the university. Attractive and effective transit options are critical to moving CU students, faculty, and staff to and from its Main and East Campuses and supporting its numerous activity generators. CU's Main and East Campuses are concentrated, walkable areas with limited parking and great transit markets.

Both campuses saw significant transit service reductions with the RTD COVID-19 Service Plan, and the draft SOP does not fully restore or significantly enhance services in campus areas impacted by the pandemic service reductions.

Prior to the pandemic, CU's East Campus was previously served by five (5) RTD routes (Routes 209, J, FF6, JUMP, and BOUND). All but the JUMP and BOUND have been suspended with the RTD COVID-19 Service Plan. The draft SOP recommends only the BOUND, a diminished JUMP, and an expanded BOLT route to serve East Campus. Critical Flatiron Flyer 6 service to Denver and Route 209 connections to campus neighborhoods are planned for discontinuation.

Service to the east side of CU's Main Campus via 28th Street/US 36 remains suspended due to the COVID-19 Service Plan. Routes FF4, FF6, AB2, and 236 operating out of Boulder Junction previously provided service along this important gateway to CU's Main Campus, and only the FF4 with reduced services is planned to return to this corridor per the SOP recommendations.

We request SOP efforts to holistically revisit service options to CU's Main and East Campuses with these concerns in mind. Similar requested efforts around revisiting service options at Boulder Junction may also identify efficient and attractive options for improved connections that serve both CU campuses and Boulder Junction.

4. Concerns about the SOP materials, timeline, and engagement avenues being used to vet and receive meaningful public input.

The SOP is a major initiative, and we commend RTD for taking a critical look at improving the attractiveness and effectiveness of its bus services. The SOP also has significant considerations and implications, as this will guide the service plan and levels for the next five years through 2027 and beyond. In reviewing the draft SOP materials, we are concerned that the SOP development and approval process is highly condensed and that there is not adequate time and channels available for comprehensive and meaningful public and rider input

considering the significance of this plan.

Accessing, understanding, and commenting on the SOP materials is difficult and requires computer literacy to navigate and find on the RTD website. For example, the one-page route proposals are not available on the primary webpage dedicated to SOP public comment for easy access and viewing. The one-page route proposals also do not include basic service span and frequency comparison information in table format between 2019, current, and proposed service levels to aid rider understanding of the proposed changes. Public input is being largely solicited via an online mapping and comment tool that requires a level of GIS software literacy to use. As of today, virtual public meetings across the district to discuss the SOP proposals and impacts with the public do not appear to be scheduled with the February 9th public input deadline rapidly approaching.

Considering the significance of the SOP and the need for extensive public and rider feedback to fully vet and refine the plan proposals, we recommend RTD consider extending its public input process and expanding its outreach materials and activities to better reach larger public audiences before this matter is heard by the RTD Board.

We sincerely appreciate the opportunity to provide technical feedback on the draft SOP. There is great interest in our community around improving RTD service options and the potential service changes and impacts that will come with the SOP. We welcome opportunity to further discuss these concerns and collaborate with your team in exploring SOP adjustments to better serve these transit market needs. We will continue to monitor the development of the SOP and share additional community concerns about the draft plan with RTD.

Thank you for your consideration of our comments and requests. Please direct follow-up communication on these items to Danny O'Connor, Transit Program Manager (OConnorD@bouldercolorado.gov), who is available to further continue this discussion and collaborate on next steps.

In partnership,



Erika Vandenbrande
Director of Transportation & Mobility

Cc:
Lynn Guissinger, Board Director, RTD
Bill Van Meter, Assistant General Manager, Planning, RTD
Aaron Brockett, Mayor
Natalie Stiffler, Deputy Director
Valerie Watson, Transportation Planning Manager
Danny O'Connor, Transit Program Manager

Northwest Mayors & Commissioners Coalition (MCC)

February 9, 2022

Boulder County

City of Boulder

*City & County of
Broomfield*

City of Lafayette

City of Longmont

City of Louisville

City of Westminster

Town of Erie

Town of Superior

Ms. Debra Johnson
RTD General Manager
1660 Blake Street
Denver, CO 80202

RE: January 2022 Re-imagine RTD System Optimization Plan

Dear Ms. Johnson:

The Northwest Mayors and Commissioners Coalition appreciates the opportunity to comment on Re-imagine RTD's System Optimization Plan.

We sincerely appreciate the challenges RTD must balance to reverse ridership loss, improve efficiency, ensure fiscal sustainability, and address changing travel demands while balancing the operational capacity of the workforce. This review and refinement of RTD's transit services along with financial and operational capacity constraints must consider and address the district-wide service needs for the Denver metro region whose taxpayers provide significant levels of local funding for transit service.

RTD must consider that transit-dependent populations live in every county of the metro region. The proposed SOP will severely impact local and regional access by equity populations to transit services in the North and Northwest Denver metro. Building and rebuilding ridership should focus on where transit-dependent riders live (as you have attempted to do), but it also needs to focus on the job centers and urban centers transit-dependent riders travel to in order to work, shop, receive an education, access health care, etc. Connecting our communities throughout the district creates a strong network that provides an attractive option for current riders that depend on the service, attracts riders lost during the pandemic, and entices new riders with affordable and sustainable travel options.

We appreciate the restoration of some of the Flatiron Flyer route patterns with additional peak service capacity to provide increased frequency, increasing the convenience and reliability of the service along US 36 to Denver and Boulder destinations. The HX and BMX routes have served the region for decades as high performing routes (now the FF4 and FF2) and restoring these routes is critical to the future of transit use in our area. Thank you for listening to our feedback driven by riders of this service.

We also appreciate RTD bolstering BOLT service on CO 119 in preparation of launching BRT service. RTD is working closely with CDOT, Boulder County, City of Boulder, and the City of Longmont on a coordinated plan to design and construct elements of the CO 119 BRT project, with substantial funding for construction in the mid-2020s already secured. Enhancing BOLT service today will help build the ridership for successful BRT service in the near future.

We have concerns that the SOP is inconsistent with other State, Regional, and Local Transportation and Planning Efforts:

- The SOP must be analyzed for its GHG emissions and brought into alignment with the ridership and reduction targets that are required to achieve the state's GHG rule and the nonattainment air quality goals. The levels of service in the SOP need to be modeled against the baseline assumptions for transit in our region to determine whether additional measures will be needed.
- A minimum level of service is needed for people to be able to see transit as a reliable transportation option. The service frequencies in the proposed SOP appear to be greatly reduced, to the point that it appears it will hinder many people from effectively relying on transit.
- The SOP should include benchmarks to help the RTD and regional stakeholders gauge progress in achieving the plan over time. For example, what is the sequencing for implementation of the plan? How will the SOP tie to the Mobility Plan for the Future?
- The SOP cannot ignore the sources of funding that RTD receives. The voters approved a special tax for FasTracks and there is a separate tax for base service. The SOP must demonstrate that the uses of funds are consistent with their legal designation. One approach to doing this would be to optimize the subsystems by funding stream. Within each funding source racial equity, serving low-income communities, climate impact, and cost recovery should be considered at the forefront while meeting the mission or allowable use of funds. In addition, more information is needed regarding the RTD's proposals related to addressing potential revenue limits under TABOR should the revenue limit be reimposed.
- There appears to be a lack of cohesion with major regional planning efforts. The SOP is inconsistent with the 2014 RTD North Area Mobility Study (NAMS) and the 2019 RTD Bus Rapid Transit Study. The NAMS corridors are envisioned to be the multimodal corridors that connect the DRCOG Metro Vision Urban Centers in the northwest, where communities have committed to focusing local development growth in residential and employment. CDOT Region 1 and Region 4 have also committed significant funding to several NAMS corridors to support

multimodal transportation in the CDOT 10-Year Plan Project Pipeline. We request that the corresponding existing transit service in the SOP explicitly acknowledge NAMS's plans for their future and establish a plan for how these routes' service patterns will evolve into BRT service in the coming years.

- The SOP should reflect opportunities for multi-agency partnerships in order to show the potential for RTD to work with others to bring about more service. One such example is the opportunity for partners to provide NAMS BRT service beyond what RTD is forecasting it can operate on its own. We request that RTD highlight these opportunity routes in the SOP. For example, the SOP recommendations for CO 7, US 287 and CO 42 should be similar to what is shown for CO 119 regarding potential partnerships.
- The SOP does not reflect incremental service changes in accordance with the planned BRT service along the CO 7 corridor between Boulder and Brighton. At a minimum, the plan should revisit the drastic 47% reduction in service hours for the JUMP route and should show connectivity to the CDOT I-25/CO 7 transit stop improvements planned to be constructed in 2023 and opened in 2024.
- The proposed transit service along the US 287 corridor in the SOP does not reflect the transit service analysis and recommendations that were developed through the recent US 287 BRT Feasibility Study developed by Boulder County in conjunction with RTD, CDOT, and the local jurisdictions along the corridor.
- The proposed reinstated LX1 bus does not follow the future US 287 BRT corridor at all but should if we're trying to build ridership along this corridor.
- The proposed transit service plan for Route 120 along 120th Ave. connecting US 36 Broomfield Station, I-25 Wagon Road, and the N-Line Rail station indicates a decrease in weekday service span to only 6:00 p.m. This corridor primarily serves retailers and employers providing essential goods and services and connects some of the northernmost stations along I-25 to the RTD regional network. We request that weekday service continue until 10 p.m. and that Saturday and Sunday service run until 9:00 p.m. as is currently in operation today.

We have significant concerns about the public engagement approach for a plan that sets the direction of the RTD transit network for the next six years:

- No public meetings are being advertised on the RTD website.
- The engagement period for such a large plan effort is very short.

- No information about the plan was available as a feature story at the RTD News Stop until approximately February 4.
- The final promotional language and engagement information was sent to stakeholders after the official launch of engagement, limiting the time stakeholders can program information through their channels to get the word out to the community.
- Lack of utilization of the Subregional Forums once the SOP was released to solicit feedback.
- Concern that efforts are being made to roll out aspects of the draft SOP before stakeholder input is collected, responded to, addressed, and adopted by the RTD board.
- The people of Boulder County are currently focused on Marshall Fire recovery. Approximately 1000 households are currently in new commuting patterns as a result of their dislocation and possibly newly transit-dependent due to loss of their vehicle. They will need time to understand RTD's role in their new living situation. The comment period should be extended so that this population has a chance to weigh in.
- The lack of proposed phasing for the SOP does not allow the public to understand how it will actually affect their travel plans since they cannot know when changes to a route will be implemented.

We do understand the financial realities that the board is facing. Still, we would like to see a more holistic approach and request that RTD delay board adoption of the SOP until the Mobility Plan for the Future and System Optimization Plan can be brought forward simultaneously so stakeholders can provide input on the complete package and potentially illuminate new funding opportunities. We feel that this combined approach would better help us understand how the two plans fit together and could lead to better service for the people. We look forward to the Mobility Plan for the Future and understanding how the System Optimization Plan is a step toward the implementation of the broader and strategic vision for all districts served by RTD.

We appreciate the opportunity to provide feedback and input.

Sincerely,



Aaron Brockett
Mayor, City of Boulder



Clint Folsom
Mayor, Town of Superior



Claire Levy
Commissioner, Boulder County



Ashley Stolzmann
Mayor, City of Louisville



Joan Peck
Mayor, City of Longmont



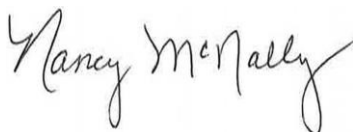
Guyleen Castriotta
Mayor, City and County of
Broomfield



Jennifer Carroll
Mayor, Town of Erie



JD Mangat
Mayor, City of Lafayette



Nancy McNally
Mayor, City of Westminster