

RTD Staff,

We would like to start by thanking RTD for undertaking the current Fare Study & Equity Analysis. That RTD's existing fares are too expensive and too complicated has been a common refrain from riders across the district, and we very much appreciate RTD taking these concerns to heart and exploring options to make the fare structure more equitable, more affordable, and easier to understand.

We would also like to thank RTD for the engagement strategies RTD has used to gather feedback throughout this process, and we hope that they have been helpful and informative for RTD.

We would like to submit the following comments on the options that have been presented thus far.

➤ **We support Alternative B (eliminating the regional fare level)**

Alternative B reduces costs for frequent riders and greatly simplifies the fare structure by implementing a flat-fare for all non-airport trips. It is also our understanding that Alternative B enjoys broad (but not unanimous) support from the public, community-based organizations, community partner focus groups, and feedback panels that RTD has engaged with throughout this study. We understand that Alternative B does not lower the local fare, which raises important equity concerns, but would like to provide our feedback on how RTD could amend Alternative B and/or the pass programs and policies to make this option more equitable.

### **Changes to Alternative B**

- We support extending the 3 hour pass to instead be a 4 hour pass to accommodate making a quick errand via regional transit, and the length of time this could take. Additionally, this would make the shorter pass time period equal to one-half of a traditional 8 hour work day (commuting to/from work for an 8 hour work day requires the day pass option).

### **LiVE Program**

We support the following options RTD has presented:

- Removing the in-district residency requirement
- Developing additional means of verifying eligibility outside of the PEAK program
- Increasing the LiVE discount to 50%
- Allowing LiVE cardholders to pay their fare in cash
- Increasing the income eligibility threshold from 185% to 200% of the Federal Poverty Level (FPL)

We support the following additional changes:

- Exploring a higher or different income eligibility threshold (using Area Median Income) in conjunction with developing a affordable housing EcoPass option

## **Youth Fares**

We support RTD offering fare free travel for youth to the greatest extent it can without external funding and looking to external funding sources to fund fare-free travel for youth up to age 19. We prefer an age-based eligibility criteria, and request that RTD explore if it can fund free fares for youth up to age 11-14 on its own. For riders close to the age limit, we accept that requiring ID/ proof of eligibility may be necessary, but request that this not be required for riders who are years younger than the limit (e.g., if youth up to age 19 ride fare free, only require proof of age for riders 15-19).

## **EcoPass/CollegePass Programs**

- We are opposed to RTD excluding pass programs from the 10% bulk purchase discount, and request that this discount be extended to pass programs
- We are opposed to RTD not including fare-capping in pass programs, and request that RTD incorporate fare-capping into pass programs.
- We support the move to biennial pricing for pass programs

## **Business EcoPass Program**

- We support the continuation of the insurance pricing model, where business pricing is determined by pooling utilization from businesses in like transit served areas together
- We support merging SLA A & B together
- We support merging all employer size categories together
- We support replacing contract minimums with a minimum employee count

## **Neighborhood EcoPass Program**

- We oppose all NECO boardings being charged at the full-fare level.
  - If this is an unavoidable reality of the new fare system, we request that RTD use population-level statistics to extend the LiVE discount to NECO programs (e.g., if 15% of the residents of the census block groups that a NECO program covers would be eligible for LiVE, when calculating the utilization-based contract price for that neighborhood, RTD would assume 15% of the boardings occurred at the 50% discount level).

## **Transit Assistance Grant Program**

- We support the creation of this program.
- If a local match requirement is considered, we recommend a tiered approach, where organizations could obtain an initial set of passes at no cost, a second set could be obtained at 10% local match, and a third set could be obtained for a 20% local match.

### **Affordable Housing Program**

- We support the creation of an Affordable Housing Pass; we encourage RTD to implement both Approach 1 (Affordable Housing EcoPass) and Approach 2 (permitting affordable housing providers to certify LiVE eligibility)
- As many affordable housing authorities determine resident eligibility using income thresholds set by HUD (60 or 80% of AMI), which can be significantly higher than the 200% of FPL that RTD is proposing for LiVE eligibility, we encourage RTD to use income eligibility thresholds that are already used by housing providers.
- As housing providers know the income levels of their tenants, we encourage RTD to permit affordable housing EcoPass/NECO programs where less than 100% of residents qualify (if a housing authority has 30% of their tenants as market rate, 30% of their utilization should be charged at the full fare level, with 70% charged at the LiVE 50% discount).

### **Semester Pass Program**

- We support the creation of this program.

### **Farebox Buy-ups**

- As farebox buy-ups are fare easier to administer than any pass program, we request that RTD either use this Fare Study & Equity Analysis to develop policies for farebox buy-ups, or create a separate and subsequent process to address this topic.

As always, we would be happy to discuss any of these ideas or requests in more detail with RTD staff.

Sincerely,

Name, submitted on behalf of ...