

Submitted as Public Comment to the RTD Board Meeting, May 28th, 2025

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

Dear Chair Bouquet,

Title VI Program Update

Please see attached letter, sent to Dani McLean at the Transit Equity Office, for our public comment on this topic.

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

May 14th, 2025

Dani McLean, Transit Equity Specialist
Regional Transportation District
1660 Blake Street
Denver, CO 80202

RTD Title VI Program Update

Dear Ms. McLean,

Greater Denver Transit (GDT) supports the updates to the Title VI policy that expand the criteria through which equity in service changes is considered. GDT believes understanding the impacts of a broader set of “major” service changes and expanding the “low income” definition to better account for residents that are likely to be transit-dependent is important and beneficial. In addition, GDT welcomes the updates to the Public Participation Plan and Language Access Plan (LAP).

In recent years, GDT has written raising concerns about the application of equity analysis on specific bus routes. We will continue to watch the implementation of Title VI feedback on RTD service planning decisions, and are hopeful that the changes proposed continue to improve the entire transit network in an equitable way.

In addition to this implemented Title VI program update, we recommend RTD:

1. Considers simplification of the signup process for the LiVE Program. This includes blanket acceptance of documents (e.g. Medicaid, SNAP), validation from trusted parties (e.g. community service providers) and a temporary self-certification option for those unable to produce documents quickly and easily.
2. Evaluates additional sources of data (e.g. ridership demographics, access to higher income employment) as inputs to the equity analysis process.
3. Recognizes the potential for expanded transit access to spread wealth around by connecting different neighborhoods and locations across the metro area (e.g. service between low-income communities and well-paying employers).
4. Analyzes the equity impacts of prolonged poor service performance (e.g. delays / disruptions / cancellations of transit service) that are not otherwise accounted for as “service changes”.

GDT thanks you for considering this feedback and your continued work to provide a transit network that serves everyone.



James Flattum



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