

Submitted as Public Comment to the RTD Service Change Process, June 14th, 2025.

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Jessie Carter, Manager, Service Planning & Scheduling
Regional Transportation District
1660 Blake Street
Denver, CO 80202

August 2025 Service Changes

Dear Mr. Carter,

Greater Denver Transit (GDT) has the following comments on the proposed August 2025 service changes:

H Line Termination at Southmoor

GDT notes the discussion between Directors and service planning staff that occurred during the Operations, Safety & Security meeting on June 11th.

We would like to emphasize the importance of treating the H Line line as a connecting shuttle between Southmoor and Florida. Southbound H Line trains need to depart Southmoor as soon as practicable after southbound E Line trains have called. Likewise, northbound H Line trains should depart Florida as soon as possible after southbound R Line trains pass.

For late afternoon and evening special events at Empower Field or the Ball Arena, consideration should be given to running H Line trains to Union Station using the space in the schedule freed up by other lines reducing frequency to 30 minutes after 6pm.

L Line Suspension

GDT is greatly concerned that once again, service on the L Line is withdrawn due to construction work happening elsewhere. This is particularly frustrating at a time where the L Line needs support more than ever as it is now clear that there are members of the community who have so lost trust in the rail service being useful that they are now campaigning to get it shut down permanently.

We urge the agency to work with its Downtown Rail Loop construction contractors and industry experts to find ways to keep the L Line running during the works as a Welton St shuttle. Possible measures could include:

1. Planning the reconstruction works in two parts so that there is always half the loop and one track available for empty train movements to / from the maintenance facilities.
2. Minimizing empty train movements by storing light rail vehicles at 30th & Downing that don't need maintenance attention. On-board cleaning could be done by a mobile unit.
3. If not already present, installing disconnect switches that allow the OCS on Welton St to remain live, even when the Downtown Rail Loop power is off.

Route FF4 Reinstatement

GDT welcomes the return of Flatiron Flyer service to Boulder Junction. However, we suggest this route serves stops in Denver on 17th & 18th streets plus Union Station in order to provide connectivity from all parts of Downtown to Boulder Junction.

Route LX2 Reinstatement

GDT is in support of the reinstatement of this route which will improve the connectivity between Longmont and Denver.

Route 6 ‘Realignment’ to Serve the Community College of Aurora

GDT fully supports providing service to Community College of Aurora’s CentreTech campus as a long overdue addition to the network. The exact nature of the proposed diversion / extension is not clear from the description provided on the service changes webpage. GDT requests a route map be provided to avoid potential confusion over the scope of this proposed change. GDT notes that this change is in conflict with the SOP, which proposes serving this campus by re-aligning route 169. We request a better understanding of the advantages of adding additional route length and operator hours to route 6 in comparison to route 169.

Routes 29, 30 and 35 Reorganization of Service

The exact nature of the proposed diversion of route 35 between Evans & Federal and Hampden & Wadsworth is not clear from the description provided on the service changes webpage. GDT requests a map is provided to avoid potential confusion over the scope of this proposed change.

Route 32 Extension to Civic Center Station

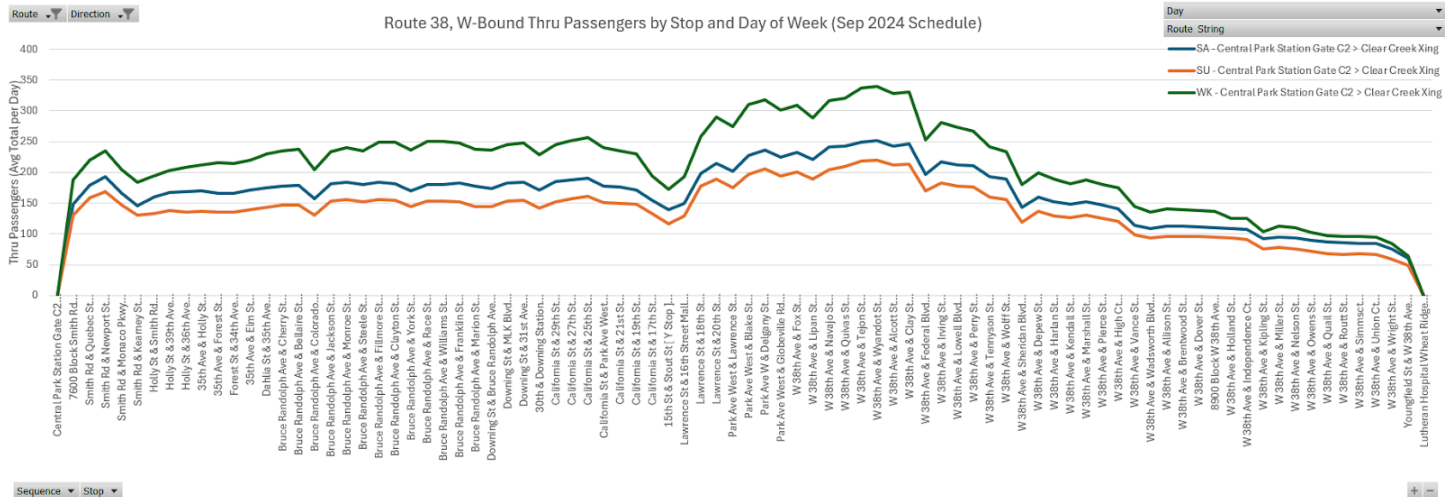
GDT is in support of the extension of this route as it will increase access to Downtown for customers riding from West 32nd Ave and improve Downtown connectivity. It is also fully in line with our Downtown Bus Plan.

Route 34 Reinstatement

GDT recommends this route be diverted to terminate at 41st & Fox with a connection at 38th & Blake after traveling west along Bruce Randolph Ave to provide easy connections to Union Station via the A Line and the west side via the G Line. Adequate service to the Downtown Loop area and Five Points from points east of 30th & Downing Station is already provided by Route 43 which runs 2-3 blocks south of Bruce Randolph Ave. The provision of a map will clarify for all customers the exact alignment of route 34.

Route 38 Termination at 30th & Downing

GDT notes the poor punctuality on this route which mainly manifests itself in eastbound buses being delayed on West 38th Ave and thus entering downtown behind schedule. This is exacerbated by the routing Downtown which takes the buses close to Coors Field on streets that do not have bus lanes.



The graph above shows the numbers of passengers on board a westbound route 38 bus, averaged out over the September 2024 runboard period. Apart from the extreme ends of the route, it can be seen that the lowest numbers of riders are on board at 15th & Stout, which points to passengers from Central Park heading into Downtown getting off the bus at earlier stops (e.g. California & 17th) before the bus starts picking up passengers on Lawrence St who are heading west on 38th Avenue.

These data lead us to conclude that the lowest numbers of thru-riding passengers are on board in central downtown on 15th St, so it makes sense to split the route there, not at 30th & Downing. Therefore, GDT recommends that this route's long term eastern terminus is Civic Center Station in accordance with our Downtown Bus Plan.

GDT would also like to see this bus rerouted to serve Union Station via Wewatta St to improve connectivity. We note that the stop that shows the most passengers boarding for westbound customers is Lawrence & 18th which is the closest one to Union Station.

Lack of Advance Schedule Information

GDT remains disappointed by RTD's continuing inability to provide even the most basic information on proposed timings. While we understand that any proposed schedule may be subject to change, it shouldn't be beyond the capabilities of staff to provide summaries of how they have scheduled routes. Even simple statements such as "Route A buses are planned to depart station Z at :xx past the hour, this is to allow customers to connect from B Line trains, which arrive at :yy past the hour." would be immensely helpful and reassuring to customers who currently feel ignored on this very important part of service planning.

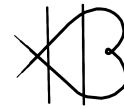
With best wishes,



James Flattum



Richard Bamber



Keith Brooks



Emma Griffin



Joe Meyer

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