

BOARD OF DIRECTORS REPORT

August 2025 Title VI Service Equity Analysis

Committee Meeting Date:
July 16, 2025
Board Meeting Date:
July 29, 2025

RECOMMENDED ACTION

For the Board of Directors (Board) to adopt the Title VI Service Equity Analysis report for the August 2025 service change to comply with federal laws, regulations, and guidelines related to Title VI of the Civil Rights Act of 1964 (Title VI).

STAFF REPRESENTATIVE

Martin Romero, Transit Equity Manager, Civil Rights Division

Carl Green Jr., Director, Civil Rights Division

Jessie Carter II, Senior Manager, Service Development

PRESENTATION LENGTH

15 minutes

BACKGROUND

The service change proposed for August 2025 facilitates opportunities for bus and rail operators to select new work shift assignments and for Service Development to adjust the overall operations plan for the transit network. Additionally, with the Board's adoption of the Reimagine RTD System Optimization Plan (SOP), several of the service change proposals reflect SOP implementation to provide the best possible value to customers.

The Board-adopted guidance for proposed service changes continues to be:

- Service performance evaluation based on service standards
- Maintaining the overall integrity of the transit network and on transit-dependent markets
- Making alternative services available to affected customers
- Cost-effective distribution throughout the District and Family of Services and the ability to enhance service when possible
- Compliance with Title VI of the Civil Rights Act: benefits and services are provided without regard to race, color, or national origin; also, disparate effects on Black Indigenous People of Color (BIPOC) and low-income populations
- Response to changes in the communities where services are provided

Title VI Service Equity Analysis Requirements

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of financial assistance with instructions for achieving compliance with Title VI. FTA requires RTD to evaluate, prior to implementation, any and all service changes that exceed the established major service change threshold to determine whether those changes will result in adverse effects. The August 2025 service

change recommendation includes nine major service changes out of 58 total changes. Thus, an analysis is required to be brought before the Board for its consideration. The complete Title VI Service Equity Analysis report is included in Attachment A.

Title VI Service Equity Analysis Policies

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a Major Service Change Policy, a Disparate Impact Policy, and a Disproportionate Burden Policy. On May 28, 2025, the Board adopted the 2025-2028 Title VI Program Update including updates to these policies. Collectively, these policies provide the foundational requirements for evaluating service change proposals for equity. These policies and their applicable thresholds are listed below:

Major Service Change Policy: defined as a 25% or greater change in service hours, route miles (including re-routes), daily service span, or frequency of any bus route or rail line within a single service proposal or cumulatively in any period within 36 consecutive months; the implementation of a new route/line; and the elimination, discontinuation, or retirement of an existing route/line. All major service changes will be subject to an equity analysis that includes an analysis of adverse effects.

- RTD defines “adverse effect” as any impact on transit services resulting from major service changes, such as service decreases, route modifications, schedule adjustments, or other modifications, that may:
 - Disproportionately burden Black, Indigenous, and People of Color (BIPOC) and/or low-income populations compared to non-BIPOC and/or non-low-income populations, or
 - Disproportionately benefit non-BIPOC and/or non-low-income populations as compared to BIPOC and/or low-income populations

Disparate Impact Policy: A major service change should not adversely affect BIPOC populations 10% more than non-BIPOC populations; this level of impact is considered a disparate impact.

Disproportionate Burden Policy: A major service change should not adversely affect a low-income population 10% more than non-low-income populations; this level of impact is considered a disproportionate burden. A low-income population is a group of households who are at or below 200% of the Department of Health and Human Services Poverty Guidelines.

DISCUSSION

Staff proposes changes to 52 bus routes (and related patterns) and six rail lines in the forthcoming service change recommendation. Of these changes, nine services have proposed additions or reductions to service 25% greater than that of baseline service and thus meet established thresholds for a major service change. Those routes are shown in the following table.

Service Increase	30, 35, 36, 135, 327, FF2, FF4, LX2
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Service Decrease	29, 30, 35
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**Route 35 appears in both the service increase and service decrease sections because the proposed change includes increased service frequency and a reroute. Likewise, Route 30 includes a segment extension and a segment discontinuance.*

Methodology: Disparate impact and disproportionate burden analyses were performed at the route/line level, route/line block group, and system level to identify any potential disparities in service changes based on race/ethnicity or income. This analysis uses demographic data from the Census Bureau’s American Community Survey (ACS) 5-Year Estimates for years 2019 to 2023 at the census block group geographic level.

The assessment also included data from its 2024 systemwide onboard survey, which included 18,285 weekday responses (66% bus, 33% rail), weighted to reflect 170,000 average weekday rides. Systemwide, BIPOC customers made up 56% of boardings and low-income customers 52%, both higher than district averages from the 2019–2023 ACS (38.2% BIPOC, 20.3% low-income).

Routes were classified as having a greater, moderate, or lesser share of BIPOC or low-income customers based on their percentage point difference from system averages. Only routes with statistically valid sample sizes were used in equity comparisons. Valid ridership data supplemented population-based analysis and helped assess potential adverse impacts of proposed service changes.

Additionally, RTD quantifies the impacts of proposed changes on Access to Jobs and Key Activity Centers, including jobs, retail/convenience stores, human and social service providers, senior facilities, and educational institutions. Jobs is derived from the Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES) 2022 dataset. Key Activity Centers uses two data sources: Environmental Systems Research Institute (ESRI) Business Analyst 2022-2023 and Denver Regional Council of Governments (DRCOG) Regional Data 2024.

Summary of Findings:

Potential disparate impacts and/or disproportionate burdens were identified at the individual route level for the following six routes:

- Route 29: A higher percentage of the District’s BIPOC population (0.68%) stands to be negatively impacted more from the proposed major service decrease as compared to the non-BIPOC population (0.37%). A higher percentage of the District’s low-income population (0.78%) stands to be negatively impacted more from the proposed major service decrease as compared to the non-low-income population (0.42%). Further, the route-level ridership data show that 69% of boardings are by BIPOC customers, indicating a greater concentration of BIPOC customers on the route. The onboard survey route-level analysis also shows that 82% of boardings are by low-income customers; however, the sample size for this group is too small to be considered statistically valid.

- Route 30: A higher percentage of the District's BIPOC population (0.54%) stands to be impacted negatively more from the proposed major service decrease as compared to the non-BIPOC population (0.36%). The route-level ridership data show that 66% of boardings are by BIPOC customers, indicating a greater concentration of BIPOC customers on the route. Additionally, 76% of boardings are by low-income customers, also indicating a greater concentration of low-income customers.
- Route 35: A higher percentage of the District's low-income population (0.38%) stands to be impacted negatively more from the proposed major service decrease as compared to the non-low-income population (0.31%). The route-level ridership data show that 64% of boardings are by BIPOC customers, indicating a greater concentration of BIPOC customers on the route. Additionally, 60% of boardings are by low-income customers, indicating a moderate concentration of low-income customers.
- Route 135: A lower percentage of the District's low-income population (0.54%) stands to benefit less from the proposed major service increase as compared to the non-low-income population (0.79%). The route-level ridership data show that 64% of boardings are by BIPOC customers, indicating a greater concentration of BIPOC customers. The onboard survey shows that 41% of boardings are by low-income customers; however, the sample size is too small to be considered statistically valid.
- Route FF2: A lower percentage of the District's BIPOC population (0.71%) stands to benefit less from the proposed major service increase as compared to the non-BIPOC population (0.95%). The route-level ridership data show that 43% of boardings are by BIPOC customers, indicating a lesser concentration of BIPOC customers. Additionally, 37% of boardings are by low-income customers, indicating a lesser concentration of low-income customers.
- Route FF4: A lower percentage of the District's BIPOC population (0.64%) stands to benefit less from the proposed major service increase as compared to the non-BIPOC population (0.82%). The route-level ridership data show that 43% of boardings are by BIPOC customers, indicating a lesser concentration of BIPOC customers. Additionally, 37% of boardings are by low-income customers, indicating a lesser concentration of low-income customers.

The proposed major service changes were also examined in aggregate, at the system level, to determine overall impacts to equity populations compared to non-equity populations.

- For system-level service increases, BIPOC populations stand to benefit more than non-BIPOC populations (7.58% vs. 5.87%, respectively). This difference does not meet the disparate impact threshold of 5.28%. Therefore, there is no system-level disparate impact finding with the proposed major service increases. Low-income populations stand to benefit more than non-low-income populations (9.32% vs. 5.69%, respectively). The difference does not meet the 10% disproportionate burden threshold of 5.12%. Therefore, no system-level disproportionate burden is found with the proposed major service increases.

- For system-level service decreases, BIPOC populations stand to benefit less than non-BIPOC populations (0.85% vs. 0.70%, respectively). This difference meets the disparate impact threshold of 0.77%. Therefore, a system-level disparate impact finding is found with the proposed major service decrease. Low-income populations stand to benefit slightly less than non-low-income populations (0.82% vs. 0.74%, respectively). The difference does meet the 10% disproportionate burden threshold of 0.81%. Therefore, a system-level disproportionate burden is found with the proposed major service decrease.

Conclusions:

There are no system-level disparate impacts or disproportionate burdens for the eight major service increases. BIPOC populations received 1.71% more of a benefit compared to non-BIPOC areas. Moreover, low-income populations received 3.63% more benefit than non-low-income populations. Although several route-level and system-level findings indicate potential disparate impacts and disproportionate burdens, RTD recommends proceeding with the August 2025 service change as proposed. This recommendation is grounded in fair and equitable distribution of transit services, alignment with the Board-approved SOP, substantial legitimate justification, and the absence of practical alternatives that would achieve the same objectives with fewer impacts to BIPOC or low-income communities.

Among the proposed changes, one route, 29, initially presented potential equity concerns. However, these are effectively mitigated through complementary service redesigns. Route 29 is set to be fully replaced by Route 30, preserving existing coverage and frequency. These adjustments help maintain access to key destinations and minimize the risk of inequitable outcomes.

The proposed elimination to the western segment of Route 30 results in a disparate impact finding at the route level. The proposed reroute to Route 35 will help minimize the impact by replacing most of the eastbound service from Wadsworth/Hampden PnR to West Yale Avenue/South Hooker Street before heading south on Federal Boulevard. However, two of the five stops between West Dartmouth Ave/South Raleigh St and South Lowell Blvd/West Linvale Place exceed a quarter mile of available service, which provides a degree of concern as these stops will not have any replacement service. Per the disparate impact policy, RTD shall consider modifications to the proposed change to ensure it avoids, minimizes, or mitigates the impact. At this juncture, the proposed reroute does not provide practical alternatives to continue service to these stops or avoid these potential impacts.

The proposed reroute of Route 35 results in a disproportionate burden due to the loss of coverage in specific areas. Route 76 will help minimize the impact by providing an alternative service option from Southwest Plaza to South Wadsworth Boulevard/West Mansfield Avenue as well as westbound from West Jefferson Avenue/ South Wadsworth Boulevard to Southwest Plaza. However, five of the 11 eastbound stops between West Jefferson/South Wadsworth Boulevard to West Dartmouth Avenue/South Sheridan Boulevard exceed a quarter mile of available service, which provides a degree of concern as these stops will not have any replacement service. Per the disproportionate burden policy, RTD will consider modifying the proposal to mitigate the impact where practicable. At this juncture, the proposed reroute does not provide practical alternatives to continue service to these stops or avoid these potential impacts.

Of the 58 total proposed service changes, nine qualify as major service increases. Seven of these serve areas with high concentrations of BIPOC customers, and eight serve areas with high concentrations of low-income customers. The observed benefit differences in the route-level analysis are relatively small—ranging from 0.16% to 0.75%—and do not indicate systemic inequities. While some route-level findings suggest potential concerns, these are addressed through broader network-level planning decisions, including route consolidation, targeted enhancements to underserved areas, and improved frequencies.

Taken together, the proposed August 2025 service change advances the agency’s 2021–2026 Strategic Plan Priority of delivering Community Value, while ensuring continued compliance with Title VI federal regulations. RTD will continue to monitor and assess equity implications for future service proposals, and where appropriate, propose adjustments to promote fair and inclusive transit outcomes.

Based on the full analysis, while isolated disparate impacts and disproportionate burdens have been identified, RTD finds that the service plan does not result in an overall inequitable distribution of benefits or burdens. Impacts have either been mitigated through complementary service changes or are supported by substantial legitimate justification aligned with agency goals. RTD recommends proceeding with the August 2025 service changes as proposed and remains committed to monitoring these areas and engaging communities to identify future adjustments where feasible.

FINANCIAL IMPACT

The adoption of the Title VI Service Equity Analysis will not result in any direct or foreseeable financial impacts.

ATTACHMENTS:

- Attachment A Title VI Service Equity Analysis Report for August 2025 Service Change Recommendation (PDF)
- Attachment B August 2025 Service Equity Analysis Recommended Action Item (PPTX)

RESULT:	PASSED BY CONSENT VOTE [UNANIMOUS]
MOVER:	Vince Buzek, Director, District J
SECONDER:	Chris Nicholson, Director, District A
AYES:	Benker, Bouquet, Buzek, Catlin, Chandler, Guissing, Gutschenritter, Guzman, Harwick, Larsen, Nicholson, O’Keefe, Paglieri, Ruscha, Whitmore

Prepared by:
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7/8/2025

Authorized by:



Debra A. Johnson, General Manager and CEO

7/9/2025

We make lives better
through connections.

Title VI Service Equity Analysis Report

August 2025 Service Changes

Service Equity Analysis: August 2025

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Executive Summary

This document summarizes the analysis of major service changes proposed for the **August 2025** runboard to ensure that the changes will not inequitably impact Black, Indigenous, and People of Color (BIPOC) and low-income populations. A major service change is defined as a 25% or greater change in service hours, route miles (including re-routes), daily service span, or frequency of any bus route or rail line within a single service proposal or cumulatively in any period within 36 consecutive months;¹ the implementation of a new route/line; and the elimination, discontinuation, or retirement of an existing route/line.

RTD's Title VI Program defines the process to identify major service changes, disparate impacts (DI), and disproportionate burdens (DB). All major service changes are subject to an equity analysis that includes examining adverse effects. RTD analyzes the route and block group levels to identify any potential disparities in service changes based on race/ethnicity or income.

Major Service Changes

In the forthcoming runboard, RTD proposes changes to **52 bus routes (and related patterns) and six rail lines**. Of these changes, **nine** meet established thresholds for a major service change:

Service Increase	Route 30: Southbound trips of Route 30 extended from Federal/Evans to Littleton/Downtown Station, as well as matching headways as described in the System Optimization Plan: weekday service from 4:00 a.m. to 1:00 a.m., while Saturday and Sunday service would operate 5:00 a.m. to 1:00 a.m. This recommendation replaces Route 29 with no loss in coverage or frequency.
	Route 35: Trips between Federal/Evans and Wadsworth/Hampden Park-and-Ride rerouted, covering areas no longer served by Route 30 due to its extension to Littleton/Downtown Station. Service frequency increased to 30 minutes for most of the day. Additionally, seasonal tripper service on the Route 30 replaced with a concurrent tripper on Route 35, covering the same area and time as the previously discontinued seasonal tripper service.
	Route 36: Schedule adjustments to establish consistent hourly headway during all hours of operation.
	Route 135: Peak period service frequency increased (a.m. and p.m. peaks) to 30 minutes. Base period service to remain at 60-minute frequency.
	Route 327: Hours of operation extended on weekdays and Saturdays to 7:00 p.m., while also making minor changes to schedule. The change addresses needs of transit-dependent workers in Longmont, matches operation hours of Routes 324 and 326, allows for improved connections, and improves on-time performance.
	Route LX2: Three southbound morning peak and two evening peak trips added, as well as two northbound morning peak and three evening peak trips, per the System Optimization Plan (SOP).
	Route FF2: Three eastbound morning peak and two evening peak trips added, as well as westbound two morning peak and three evening peak trips, to address occurring overloads, between 7:00 a.m. and 8:30 a.m. as well as 4:00 p.m. and 5:30 p.m. on weekdays.
	Route FF4: Route FF4 reinstated by adding four peak period trips in each direction.
Service Decrease	Route 29: With the implementation of changes to the Route 30, Route 29 eliminated and replaced by extended trips on the Route 30 – South Federal.
	Route 30: Service to Bear Valley via Dartmouth discontinued; instead, service continues straight along Federal Blvd between Colfax Ave and Littleton Downtown Station.
	Route 35: Route 35 south of Wadsworth/Hampden truncated to eliminate service duplication to Long/Bowles.

Findings

1. No system-level DI or DB finding for the eight major service increases.
2. Two out of the eight major service increases resulted in a potential DI, and one resulted in a potential DB at the route level.
3. System-level DI and DB finding for the two major service decreases. Specifically, a slightly greater percentage of BIPOC populations are more likely to be negatively impacted from the decreases than non-BIPOC populations (0.85% vs. 0.70%, respectively). Likewise, a slightly greater percentage of low-income populations are more likely to be negatively impacted from the decreases than non-low-income populations (0.82% vs. 0.74%, respectively).

¹ The cumulative 36-month period begins when the first change to a route/line is made.

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- Two out of three major service decreases resulted in a potential DI, and two resulted in a potential DB at the route level.

Introduction

Title VI

The mission of the Regional Transportation District (RTD) is to make lives better through connections, and its vision is to be the trusted leader in mobility, delivering excellence and value to our customers and community. Title VI and equity are central to this mission and vision. An equitable mass transit system ensures that the benefits and burdens of service are distributed fairly, regardless of race, color, national origin, or income level. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs receiving federal financial assistance. Specifically, Title VI states, "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI. In this circular, the FTA requires RTD to evaluate, prior to implementation, any and all service changes that exceed the established major service change threshold, and to determine whether those changes will have a disproportionately negative impact on populations comprising BIPOC or low-income populations.

RTD has prepared this equity analysis to document changes that are proposed to occur between the current and proposed service change packages. These changes and all others have been reviewed individually at the route/line level and in aggregate at the block group level to identify potential impacts to the communities RTD serves.

Service Change Philosophy

An equity analysis is triggered by proposed major service changes to RTD's transit services. These changes include the addition of service hours, route miles (including re-routes), daily service span, or frequency; implementation of a new route or line; and the elimination, discontinuation, or retirement of an existing route/line. RTD has established principles to identify the service changes needed to meet the diverse travel needs of those within the service area and maintain a high-performance, sustainable transit system.

RTD Service Changes Guiding Principles

- Service performance evaluation based on service standards
- The effects on the overall integrity of the transit network and on transit dependent markets
- The availability of alternative services to affected customers
- Cost-effective distribution throughout the service area and Family of Services and the ability to enhance service when possible
- Compliance with Title VI of the Civil Rights Act: benefits and services are provided without regard to race, color, or national origin; also, disparate effects on low-income and BIPOC populations
- Response to changes in the communities where services are provided

RTD services are divided into various service classes (Family of Services) depending on service type, route/line alignment, and frequency. Each service class has its own service standards derived from the performance of all routes/lines within each class. RTD continually and comprehensively adjusts services in response to changes in ridership and operational performance of the transit system. It is also the agency's responsibility to identify services that are underperforming and recommend modifications, curtailment, or cancellation of service as warranted. In keeping with state law, RTD utilizes official service standards to establish performance metrics used to identify underperforming services on a class-of-service basis. The agency uses these metrics to identify a series of service changes.

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...The general assembly further finds that the service area should be organized efficiently, economically, and on a demand-responsive basis and that the service area should consider least-cost alternatives in discharging its responsibilities.

Colorado Revised Statutes §32-9-119.7 Farebox Recovery Ratios – Plans

RTD's Title VI Equity Analysis Policies

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a major service change policy, a DI policy, and a DB policy. Collectively, these policies provide foundational requirements for evaluating service and fare change proposals for equity. These policies and their applicable thresholds are listed below:

- **Major Service Change:** A major service change is defined as a 25% or greater change in service hours, route miles (including re-routes), daily service span, or frequency of any bus route or rail line within a single service proposal or cumulatively in any period within 36 consecutive months²; the implementation of a new route/line; and the elimination, discontinuation, or retirement of an existing route/line. All major service changes will be subject to an equity analysis that includes an analysis of adverse effects.
 - RTD defines "**adverse effect**" as any impact on transit services resulting from major service changes, such as service decreases, route modifications, schedule adjustments, or other modifications, that may:
 - Disproportionately burden BIPOC and/or low-income populations compared to non-BIPOC and/or non-low-income populations, or
 - Disproportionately benefit non-BIPOC and/or non-low-income populations as compared to BIPOC and/or low-income populations
- Any service change that does not meet the above criteria for a major service change is considered a **minor service change**. Additionally, the following exceptional cases are exempt:
 - Discontinuance of service that is replaced by a different mode or operator, provided the new service offers the same or better headways, fare, transfer options, span of service, and stops served
 - Standard seasonal or schedule adjustments, unless the adjustments, as compared to operations during the previous season, falls within the major service change definition above
 - Emergency service changes, including changes in routes or service frequencies, which may be necessitated due to a state of fiscal emergency or a major catastrophe (e.g., natural or human-made disasters) which severely impairs public health or safety, changes in access to public streets, or the ability of RTD vehicles to travel on public streets
 - Service changes (e.g., detours) due to roadway or rail infrastructural projects undertaken by external stakeholders (e.g., the Colorado Department of Transportation, City and County of Denver) that would remain in effect for 12 months or less
 - Creation, alteration, or elimination of a supplemental, temporary, or demonstration service that would remain in effect for 12 months or less
 - Adjustments made to major service changes after Board approval but prior to the effective date that would otherwise be considered minor changes
- **Disparate Impact Policy:** A major service change should not adversely affect a BIPOC population 10 percent more than non-BIPOC populations; this level of impact is considered a DI.
- **Disproportionate Burden Policy:** A major service change should not adversely affect a low-income population 10% more than non-low-income populations; this level of impact is considered a DB. A low-income population is a group of households who are at or below 200% of the Department of Health and Human Services Poverty Guidelines.

If a proposed major service change results in a DI, RTD shall consider modifications to the proposed change to ensure it avoids, minimizes, or mitigates the potential DI. A major service change that results in a DI can only be implemented if:

1. There is a substantial legitimate justification for the proposed major service change, and
2. There are no alternatives that would have a less DI while still accomplishing RTD's legitimate program goals

If a proposed major service change results in a DB, RTD will consider modifying the proposal to mitigate the impact where practicable.

² The cumulative 36-month period begins when the first change to a route/line is made.

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Public Outreach Overview

RTD conducted a comprehensive outreach effort to promote its public meetings and gather feedback on the proposed changes. The Transit Equity Office and its contracted partners engaged 735 community members at 19 events tailored to historically underserved communities across the RTD service area. Contractors also promoted the meetings via social media, reaching 1,231 individuals, and through newsletters opened by 6,330 recipients.

To further raise awareness, RTD issued three news releases in English and Spanish to 720 regional media outlets and general recipients, distributed the June *Read-n-Ride* newsletter to 992 subscribers, conducted email outreach to the Transportation Management Associations, and delivered five presentations on the proposed changes to Subregional Service Councils.

Additionally, the Communications and Engagement Department and the Americans with Disabilities Act Office emailed 32 and ten community-based organizations and key activity centers, respectively — such as senior housing facilities, affordable housing communities, schools, places of worship, and government social service agencies.

To ensure transparency and provide a forum for public input, RTD also hosted two public meetings on June 16, 2025, and one “Ask a Service Planner” meeting on June 17, 2025, with a total of 25 attendees. **Table 1** summarizes the feedback themes received on major service changes from these meetings and from individual route surveys.

Table 1. Public Comment Themes by Route

Route 29	Concerns centered around maintaining adequate coverage, with many noting that previous service reductions have already made commuting difficult. Suspending Route 29 is seen as an unnecessary cut that would negatively impact transit-dependent customers who rely on this service.
Route 30	Customers expressed concern that the proposed rerouting would cut off access to key destinations like Hampden and Wadsworth Park-n-Ride, Bear Valley, Sheridan, and Wadsworth. This change would require additional transfers, namely to Route 35, and increase travel time. Commenters stressed that the affected area includes many transit-dependent customers. Some proposed alternatives, such as turning Route 31 into a full Federal crosstown line, to improve north-south service without removing Route 30’s east-west connections. While a few supported simplifying the route and boosting frequency during peak hours, most emphasized the need to preserve existing access without added transfers.
Route 35	Many respondents supported increased frequency and better connections to light rail and major intersections but raised concerns about losing service along the Hampden frontage road and to Fort Logan, areas with high transit dependence. Commenters urged RTD to maintain existing service to key destinations like Southwest Plaza and to update outdated signage that may mislead customers.
Route 36	Commenters emphasized the need for more frequent service during peak hours, suggesting 30-minute intervals instead of the current 60-minute schedule. They appreciated that the route reduces the need for transfers and wanted to maintain that convenience.
Route 135	Comments emphasized that increasing the Route 135’s frequency to every 30 minutes during peak hours is helpful but insufficient, with many advocating for consistent 30-minute service throughout the day to make the route more reliable and appealing.
Route 327	Commenters wanted extended service hours in Longmont, requesting buses to run until 10 p.m. Monday through Saturday and until 8 p.m. on Sundays, especially during the summer. They emphasized that these changes would better align with work schedules and expand transit options. Sunday service was highlighted as a missing but valuable addition.
Route LX2	Customers expressed strong support for restoring direct Longmont–Denver express service, highlighting the LX2 as a valuable option that improves regional connectivity and reduces commute times, particularly for residents of Niwot and Longmont. Several commenters requested more frequent trips throughout the day, especially during reverse-peak hours, and noted that current schedules may not align with early work shifts.
Route FF2	Respondents overwhelmingly supported the expansion of FF2 service, emphasizing its importance in reducing travel time, alleviating overcrowding, and providing more flexible and reliable commuting options between Boulder and Denver. Many noted that current buses are often at capacity during peak hours, with standing-room-only conditions that pose safety and accessibility concerns. Increased frequency, especially during mornings, evenings, and beyond

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	peak periods, is seen as essential for supporting working families, students, and low-income customers.
Route FF4	Public feedback strongly supported restoring the FF4 route, with many noting it will significantly reduce commute times to Civic Center, eliminate the need for transfers at Union Station, and encourage a return to public transit. Respondents highlighted the importance of reconnecting Boulder Junction to downtown Denver. Several also requested earlier departures and increased frequency to better meet demand and accommodate diverse schedules.

RTD also allows the public to submit comments to service.changes@rtd-denver.com, by phone at 303-299-2004, and by fax at 303-299-2227.

Analysis

Data Sources and Methodology

RTD calculates the net change in service hours, route miles (including re-routes), daily service span or frequency, the implementation of a new route or line, and the elimination, discontinuation, or retirement of an existing route/line for each proposal made either at one time or cumulatively over a 36-month period. Any change meeting or exceeding a 25% difference from baseline service levels is flagged as a major service change and subject to further equity analysis.

Major Service Change Test

Identify routes with proposed major service changes (based on trips, hours, miles, implementation of a new route or line; or the elimination, discontinuation, or retirement of an existing route/line) of 25% or more, made at one time or cumulatively over a 36-month period.

For each major service change, RTD categorizes affected routes or lines as either “equity” or “non-equity” based on the demographic characteristics of their service areas in the current network. A proportional equity analysis is conducted to evaluate whether the proposed change disproportionately affects equity populations. This involves comparing the proportion of BIPOC and low-income populations within each impacted route or line’s service area to the service areawide proportions of those same populations. If the analysis identifies that an equity population within a service area would experience service impacts 10% or greater than non-equity populations, the route or line is flagged for a potential finding of *DI* (for BIPOC populations) or *DB* (for low-income populations).

The proportional analysis uses demographic data from the Census Bureau’s American Community Survey (ACS) 5-Year Estimates for years 2019 to 2023 at the census block group geographic level. Other data related to the analysis includes route alignments and block group geography. The linking of these datasets into a service-geographic-demographic combination relates populations with changes in service at a geographic level to aid in reviewing potential impacts to service area equity communities, which include BIPOC and low-income populations.

BIPOC status includes all populations identifying as non-white and/or Hispanic or Latine. Low-income status within the service area is based on ACS population estimates and defined as households at or below 200% of the federal poverty level, adjusted for local context—equivalent to an annual income of \$53,300 for a family of three. The service area is based on the collection of block groups wholly or partially within service area boundaries.

Route/line service area population is determined using a quarter mile “catchment area” centered around bus stops and rail stations. This catchment area is then used to calculate the percentage overlap of block group-based population within that buffer. For instance, if a catchment area contains 100% of the underlying block group, 100% of the population would be associated with the services within a quarter mile; if 50% of a block group was contained in the catchment area, only half of the underlying population would count as being included (ratios of population demographics remain unchanged).

This analysis also uses ridership data from RTD’s 2024 systemwide onboard customer survey (onboard survey), which provides a snapshot of weekday trip characteristics across 99 bus routes and 10 rail lines with 18,285 customer responses (excluding visitors). The survey resulted in 66% sample of trips for bus and 33% sample

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for rail. Data is weighted³ to the estimated weekday ridership of 170,000 originating rides based on the September 2024 runboard. Customer demographics by boardings were examined to determine service area averages for BIPOC and low-income customers. Results indicate BIPOC customers accounted 56% of boardings and low-income customers accounted for 52% of boardings. Comparing this to the 2019-2023 ACS, the customers in this sample are well above the district averages for both BIPOC (38.2%) and low-income (20.3%) populations. Further examination of the onboard survey data was completed to determine statistical validity of the ridership demographics at the route/line level. As such, routes/lines that have a sufficient sample size will be utilized to supplement the proportional analysis using ACS or population-based data. Routes/lines that do not have sufficient sample size will be indicated with a N/A or not applicable. The ridership data analysis is utilized for two purposes: 1) to compare with population-based data; and 2) to provide another threshold for determining adverse effects on BIPOC and low-income customers. To assess whether a route has a relatively greater, moderate or lower share of BIPOC or low-income customers compared to the RTD service area average, onboard survey results are categorized using the following thresholds shown in **Table 2**.

Table 2. Onboard Survey Thresholds

Category	Difference from Service Area Average	Interpretation
Greater Share	≥ +10 percentage	Route has a substantially higher share than the service area average
Moderate Share	Between 0 and +9.99 percentage	Route has a slightly higher or near-average share
Lesser Share	≤ 0 percentage	Route has a lower share than the service area average

Additionally, RTD quantifies the impacts of proposed changes on Access to Jobs and Key Activity Centers, including jobs, retail/convenience stores, human and social service providers, senior facilities, and educational institutions. Jobs is derived from the Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES) 2022 dataset. Key Activity Centers uses two data sources: Environmental Systems Research Institute (ESRI) Business Analyst 2022-2023 and Denver Regional Council of Governments (DRCOG) Regional Data 2024.

Route- and Line-Level Major Service Change Analysis

RTD first reviewed changes in aggregate equity groupings of routes/lines prior to individual review of routes/lines, route/line block groups, and overall network levels; equity grouping comparison occurred at every level. Major service changes are characterized as either **major service decreases** (i.e., a service reduction of 25% or more) or **major service increases** (i.e., a service increase of 25% or more). This runboard proposes two major service decreases and nine major service increases.

Having identified the service changes which meet the threshold of the major service change policy, the next step in the analysis is to look at each route/line individually to determine potential DI and/or DB on both service decreases and service increases. For service increases, the analysis examines the extent to which BIPOC and low-income populations benefit compared to non-BIPOC and/or non-low-income populations. For service decreases, the analysis examines the extent to which the changes burden BIPOC and low-income populations compared to non-BIPOC and/or non-low-income populations.

DI and DB Analysis

For each route/line with a major service change, determine the percent of the route's/line's impacted equity and non-equity populations comprising the service area's equity and non-equity populations; if the difference is greater than 10% for equity populations, additional review is required for potential adverse impacts

³ Weighting and expanding survey data are crucial steps in market research to ensure your findings accurately represent the target population and allow for more reliable generalizations. Weighting adjusts for discrepancies in the sample's demographics compared to the population, while expansion helps you translate sample findings into estimates for the entire population.

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In concert with RTD’s Title VI Program policies, RTD reviewed the demographics of each of the major service changes’ routes/lines for potential DI or DB findings. For service increases, the following analysis examines the extent to which the benefits of the improvements are inclusive of BIPOC and low-income populations. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual route/line follows, which includes further considerations of access to jobs, education, health care, retail and convenience stores (including grocers), and social services for BIPOC and low-income populations.

Route 29

Proposal: With the implementation of changes to the Route 30, the Route 29 would be eliminated and replaced by extended trips on the Route 30 – South Federal.

As shown in **Table 3**, a larger share of the service area’s low-income population (0.78%) would be affected by the proposed major service decrease compared to the non-low-income population (0.42%). This meets the 10% DB threshold (0.42%). Similarly, a higher percentage of BIPOC populations (0.68%) would be impacted compared to non-BIPOC populations (0.37%), meeting the 10% DI threshold (0.41%). These results indicate both a potential DB and a DI finding.

Further, the route-level ridership data show that 69% of boardings are by BIPOC customers (**Table 4**), indicating a greater share of BIPOC customers on the route. The onboard survey route-level analysis also shows that 82% of boardings are by low-income customers; however, the sample size for this group is too small to be considered statistically valid. As a result, no further analysis will be conducted for income using the ridership data.

Table 3. Route 29 DI and DB Analysis

Route 29				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	7,115	8,016	10,077	4,773
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
<i>% Population Not Impacted</i>	99.63%	99.32%	99.58%	99.22%
<i>% Population Impacted</i>	0.37%	0.68%	0.42%	0.78%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.41%	0.68%	0.42%	0.78%

Table 4. Route 29 Onboard Survey Analysis

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/()	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/()
56%	69%	13%	52%	82%	N/A

The Route 29 elimination would impact access to approximately the following jobs and key activity centers:

Table 5. Route 29 Impacted Access to Jobs and Key Activity Centers

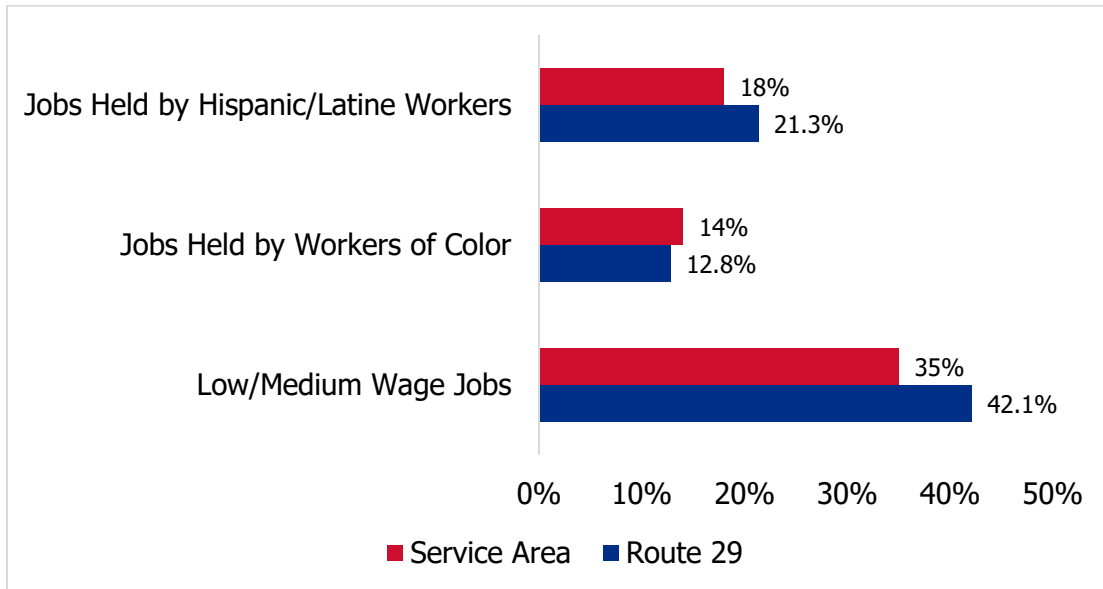
Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
7,741	49	9	2	19	19

As **Table 5** illustrates, the elimination of Route 29 would affect access to 7,431 jobs. Of these, 42.1% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 1). Additionally, 12.8% of the jobs

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are held by BIPOC workers (below the service area average of 14%), while 21.3% are held by Hispanic/Latine workers — higher than the service area average of 18%.

Figure 1. Impact of Changes to Route 29 on Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers⁴



Taken together, these findings suggest potential equity impacts at the route level that would require further review, including analysis of access to key activity centers, community input, and system-wide effects. However, Route 29 is proposed to be entirely replaced by Route 30 without any loss in coverage or frequency (see below). Thus, potential equity findings and impacts on the populations, jobs, and key activity centers described here are mitigated.

Route 30

Proposal: Extend southbound trips of Route 30 from Federal/Evans to Littleton/Downtown Station, as well as matching headways as described in the System Optimization Plan: weekday service from 4:00 a.m. to 1:00 a.m., while Saturday and Sunday service would operate 5:00 a.m. to 1:00 a.m. This recommendation replaces Route 29 with no loss in coverage or frequency. The Route 30 is also proposed to no longer serve Bear Valley via Dartmouth, and to instead continue straight along Federal Blvd between Colfax Ave and Littleton Downtown Station. Bear Valley would instead be served by Route 35.

Because Route 30 is proposed for both an increase and a decrease, calculations for DI/DB findings are performed separately for the segment receiving increases and for the segment receiving decreases.

Route 30 Service Increase

As shown in **Table 6**, a larger share of the service area's low-income population (1.83%) would benefit from the proposed major service increase compared to the non-low-income population (0.78%). This meets the 10% DB threshold (0.70%). Similarly, a higher percentage of BIPOC populations (1.68%) would benefit compared to non-BIPOC populations (0.57%), meeting the 10% DI threshold (0.51%). Given that this is a service increase, these results indicate neither a potential DB nor a DI finding.

Further, the route-level ridership data show that 66% of boardings are by BIPOC customers (**Table 7**), indicating a greater share of BIPOC customers on the route. The onboard survey route-level analysis also shows that 76% of boardings are by low-income customers, indicating a greater share of low-income customers on the route.

Taken together, these findings do not suggest potential equity impacts at the route level that would require further review.

⁴Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latine. Note that this dataset does not include Hispanic/Latine amongst workers of color, separating race from ethnicity. Source: US Census Bureau, 2019.

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Table 6. Route 30 Increase DI and DB Analysis

Route 30 Increase				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	10,877	19,776	18,967	11,278
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
<i>% Population Not Impacted</i>	99.43%	98.32%	99.22%	98.17%
<i>% Population Impacted</i>	0.57%	1.68%	0.78%	1.83%
Thresholds	DI		DB	
<i>DI & DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.51%	1.68%	0.70%	1.83%

Table 7. Route 30 Onboard Survey Analysis

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/()	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/()
56%	66%	10%	52%	76%	24%

The increase in service on this route would improve/maintain access to approximately the following jobs and key activity centers:

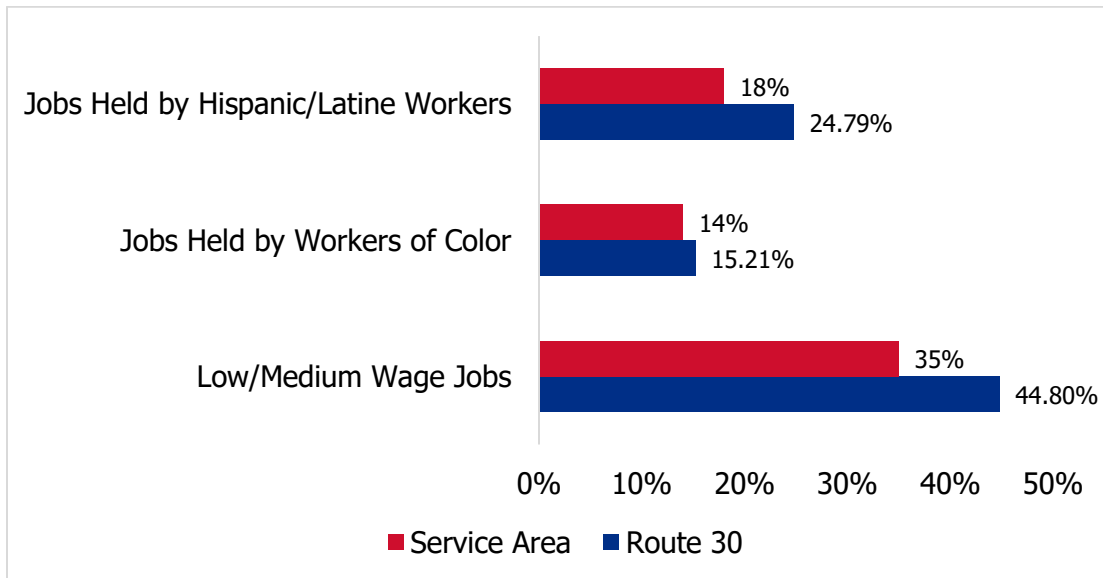
Table 8. Route 30 Increase Impacted Access to Jobs and Key Activity Centers

Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
11,747	128	30	9	47	42

As **Table 8** illustrates, the increase in service on Route 30 would affect access to 11,747 jobs. Of these, 44.8% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 2). Additionally, 15.21% of the jobs are held by BIPOC workers (above the service area average of 14%), while 24.79% are held by Hispanic/Latine workers — higher than the service area average of 18%.

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Figure 2. Impact of Increase to Route 30 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



Route 30 Service Decrease

In addition to its extension, Route 30 is proposed for elimination of its western segment that would instead receive coverage from Route 35. The following calculations pertain to this segment.

As shown in **Table 9**, a slightly higher share of the service area’s low-income population (0.44%) would be impacted by the proposed major service decrease compared to the non-low-income population (0.43%). This does not meet the 10% disproportionate burden threshold (0.47%). A higher percentage of BIPOC populations (0.54%) would be impacted compared to non-BIPOC populations (0.36%), meeting the 10% DI threshold (0.40%). These results do not indicate a potential DB finding but do indicate a potential DI finding. Ridership data for this service decrease remains the same as above, indicating a greater share of both BIPOC and low-income customers on this route; please refer to **Table 8**.

Table 9. Route 30 Decrease DI and DB Analysis

Route 30 Decrease				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	6,950	6,321	10,367	2,718
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
<i>% Population Not Impacted</i>	99.64%	99.46%	99.57%	99.56%
<i>% Population Impacted</i>	0.36%	0.54%	0.43%	0.44%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.40%	0.54%	0.47%	0.44%

The decrease in service on this route would impact access to approximately the following jobs and key activity centers:

Table 10. Route 30 Decrease Impacted Access to Jobs and Key Activity Centers

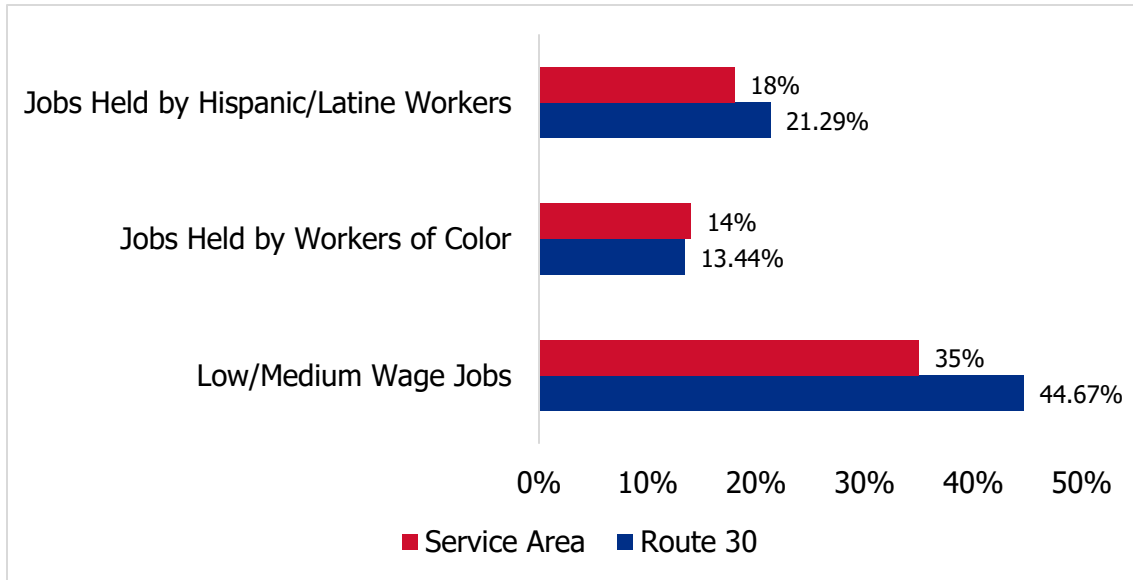
Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
2,626	31	6	4	13	8

As **Table 10** illustrates, the increase in service on Route 30 would affect access to 2,626 jobs. Of these, 44.67% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 3). Additionally, 13.44%

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of the jobs are held by BIPOC workers (slightly below the service area average of 14%), while 21.29% are held by Hispanic/Latine workers — higher than the service area average of 18%.

Figure 3. Impact of Decrease to Route 30 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



No DB is found at the route level. Therefore, no further examination is needed to assess adverse effects on low-income populations. However, there is a potential DI finding, which suggests potential equity impacts for BIPOC populations requiring further review, including analysis of access to key activity centers, community input, and system-wide effects.

Route 35

Proposal: Reroute trips of Route 35 between Federal/Evans and Wadsworth/Hampden Park-and-Ride, covering areas no longer served by Route 30 due to its extension to Littleton/Downtown Station. The recommendation also includes the truncation of Route 35 south of Wadsworth/Hampden to eliminate service duplication to Long/Bowles. Service frequency would be increased to 30 minutes for most of the day. Additionally, it is recommended to replace the seasonal tripper service on Route 30 with a concurrent tripper on Route 35, covering the same area and time as the previously discontinued seasonal tripper service.

Route 35 Service Increase

As shown in **Table 11**, a higher percentage of the service area’s low-income population (1.20%) would benefit from the proposed major service increase compared to the non-low-income population (0.67%). This does not meet the 10% DB threshold (0.60%), meaning no potential DB is found. Similarly, a higher percentage of BIPOC populations (1.92%) would benefit compared to non-BIPOC populations (1.37%), not meeting the 10% DI threshold (1.24%). As a result, there is no potential DI or DB findings at the route level, and no further review is required.

Further, the route-level ridership data shows that 64% of boardings are by BIPOC customers (**Table 12**), indicating a moderate share of BIPOC customers on the route. The onboard survey route-level analysis also shows that 60% of boardings are by low-income customers, indicating a moderate share of low-income customers on the route.

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Table 11. Route 35 Increase DI and DB Analysis

Route 35				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	26,163	22,564	16,333	7,395
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
<i>% Population Not Impacted</i>	98.6%	98.1%	99.3%	98.8%
<i>% Population Impacted</i>	1.37%	1.92%	0.67%	1.20%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	1.24%	1.92%	0.60%	1.20%

Table 12 Route 35 Onboard Survey Analysis

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/()	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/()
56%	64%	8%	52%	60%	8%

The increase in service on this route would improve/maintain access to approximately the following jobs and key activity centers:

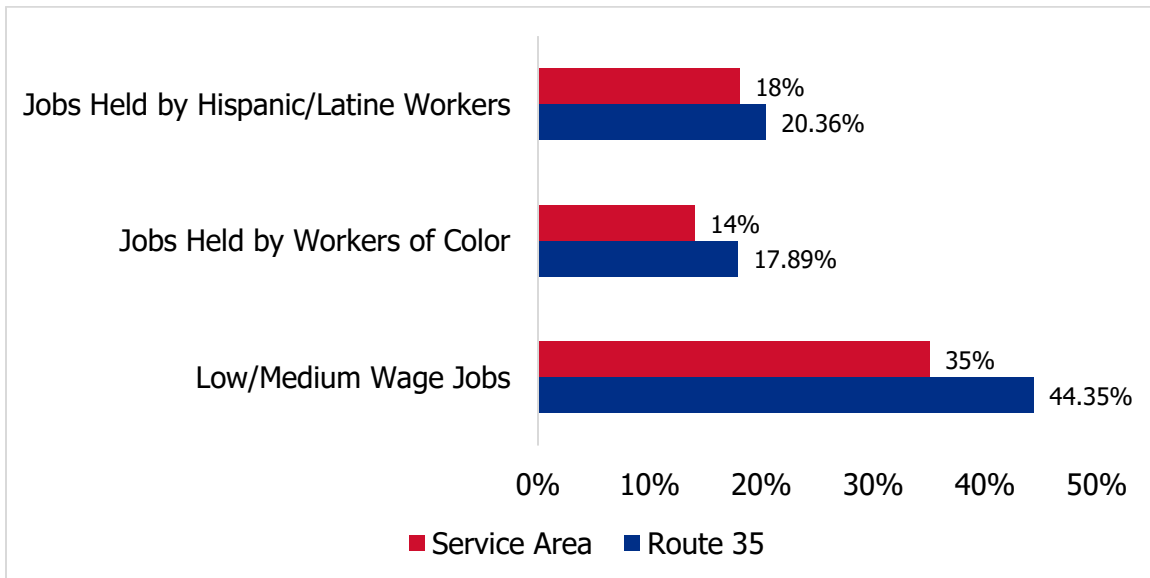
Table 13. Route 35 Increase Impacted Access to Jobs and Key Activity Centers

Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
27,404 jobs	134	45	13	30	46

As **Table 13** illustrates, the increase in Route 35 would affect access to 27,404 jobs. Of these, 44.35% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 5). Additionally, 17.98% of the jobs are held by BIPOC workers (below the service area average of 14%), while 20.36% are held by Hispanic/Latine workers — higher than the service area average of 18%.

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Figure 5. Impact of Increase to Route 35 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



Route 35 Service Decrease

In addition to its re-route, Route 30 is proposed for truncation of its duplicative segment to Long/Bowles. The following calculations pertain to this segment.

As shown in **Table 14**, a slightly higher share of the service area’s low-income population (0.38%) would be impacted by the proposed major service decrease compared to the non-low-income population (0.31%). This meets the 10% DB threshold (0.34%). A lower percentage of BIPOC populations (0.31%) would be impacted compared to non-BIPOC populations (0.33%), which does not meet the 10% DI threshold (0.37%). These results indicate a potential DB finding but do not indicate a potential DI finding. Ridership data for this service decrease remains the same as above, indicating a moderate share of both BIPOC and low-income customers on this route; please refer to **Table 12** above.

Table 14. Route 35 Decrease DI and DB Analysis

Route 35				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	6,343	3,620	7,547	2,333
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
<i>% Population Not Impacted</i>	99.7%	99.7%	99.7%	99.6%
<i>% Population Impacted</i>	0.33%	0.31%	0.31%	0.38%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.37%	0.31%	0.34%	0.38%

The decrease in service on this route would impact access to approximately the following jobs and key activity centers:

Table 15. Route 35 Decrease Impacted Access to Jobs and Key Activity Centers

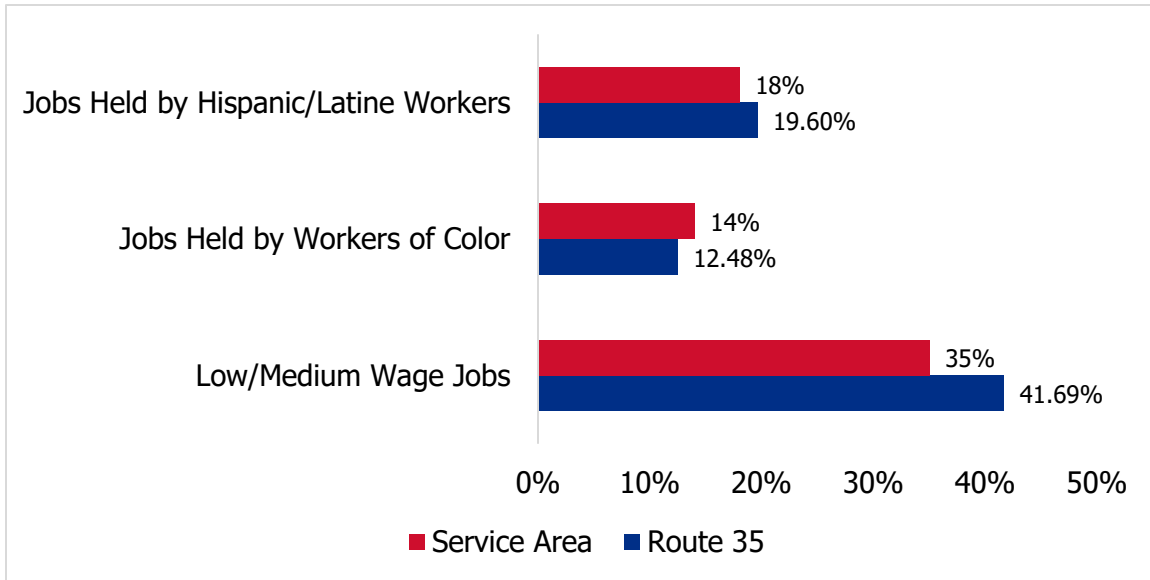
Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
6,922 jobs	36	4	4	8	20

As **Table 15** illustrates, the decrease in Route 35 would affect access to 6,922 jobs. Of these, 41.69% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 6). Additionally, 12.48% of the

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jobs are held by BIPOC workers (below the service area average of 14%), while 19.60% are held by Hispanic/Latine workers — higher than the service area average of 18%.

Figure 6. Impact of Decrease to Route 35 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



No DI found at the route level. Therefore, no further examination is needed to assess adverse effects on BIPOC populations. However, there is a DB finding, which suggests potential equity impacts for low-income populations requiring further review, including analysis of access to key activity centers, community input, and system-wide effects.

Route 36

Proposal: Establish a consistent 60-minute service frequency during all hours of operation.

As shown in **Table 16**, a greater share of the service area’s low-income population (0.89%) is expected to benefit from the proposed major service increase compared to the non-low-income population (0.52%). The difference meets the 10% DB threshold (0.47%). Therefore, no potential DB is identified at the route level. Similarly, a higher percentage of the service area’s BIPOC population (0.81%) is expected to benefit compared to the non-BIPOC population (0.47%). The difference meets the 10% DI threshold (0.42%), indicating no potential DI at the route level.

The route-level ridership data show that 63% of boardings are by BIPOC customers and 66% are by low-income customers (**Table 17**). However, the sample size does not meet the threshold for statistical validity. As a result, no further analysis by income will be conducted using this ridership data.

Based on these findings, there are no potential equity impacts at the route level that warrant further review, such as additional analysis of access to key destinations, public input, or system-wide effects.

Table 16. Route 36 (Existing) DI and DB Analysis

Route 36				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	8,938	9,534	12,548	5,453
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
<i>% Population Not Impacted</i>	99.53%	99.19%	99.48%	99.11%
<i>% Population Impacted</i>	0.47%	0.81%	0.52%	0.89%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.42%	0.81%	0.47%	0.89%

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Table 17. Route 36 Onboard Survey Analysis

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/- ()	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/- ()
56%	63%	N/A	52%	66%	N/A

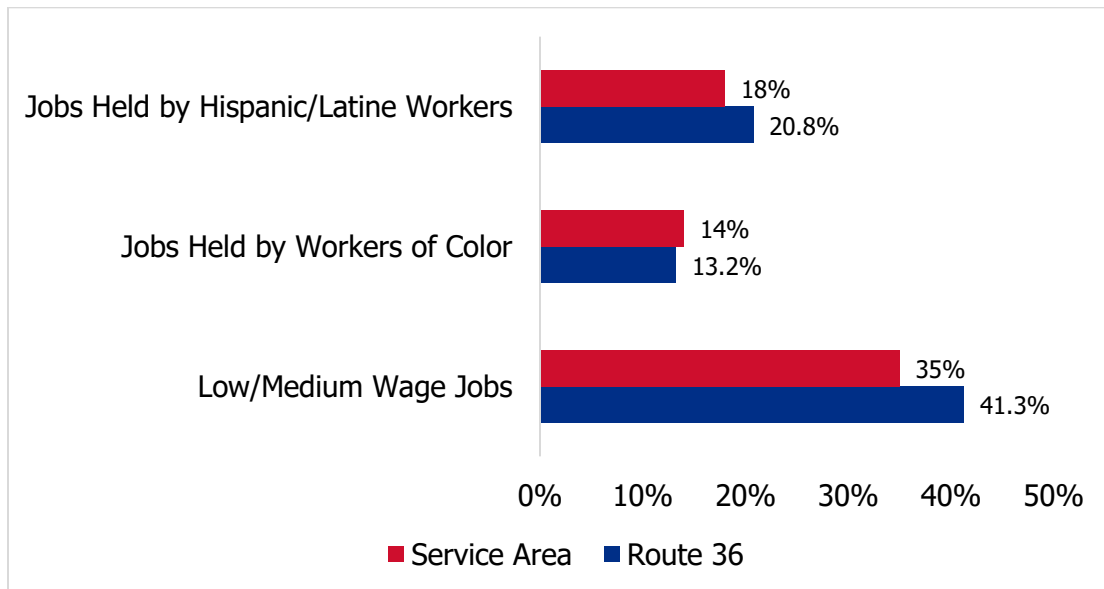
The increase in service on this route would improve access to approximately the following jobs and key activity centers:

Table 18. Route 36 Improved Access to Jobs and Key Activity Centers

Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
7,353 jobs	57	12	5	23	17

As **Table 18** illustrates, the increase in service on Route 35 would affect access to 7,353 jobs. Of these, 51% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 7). Additionally, 13% of the jobs are held by BIPOC workers (below the service area average of 14%), while 21% are held by Hispanic/Latine workers — higher than the service area average of 18%.

Figure 7. Impact of Changes to Route 36 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



Route 135

Proposal: Increase peak period service frequency (AM and PM peaks) to 30 minutes. Base period service would remain at 60-minute frequency.

As shown in **Table 19**, a lower percentage of the service area’s low-income population stands to benefit from the proposed major service increase as compared to non-low-income population (0.54% vs. 0.79%, respectively). This difference meets the 10% DB threshold (0.71%). Therefore, a potential route-level DB is found. A slightly lower percentage of the service area’s BIPOC population benefits from the proposed major service increase as compared to the non-BIPOC population (0.70% vs. 0.75%, respectively). This difference does not meet the 10% DI threshold (0.68%). Thus, there is no potential DI found at the route level.

Further, the route-level ridership data shows that 64% of boardings are by BIPOC customers (**Table 20**), indicating a greater concentration of BIPOC customers on the route. The onboard survey route-level analysis also shows that 41% of boardings are by low-income customers; however, the sample size for this group is too small to be considered statistically valid. As a result, no further analysis will be conducted for income using the ridership data.

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Table 19. Route 135 DI and DB Analysis

Route 135				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	14,378	8,220	19,180	3,340
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
<i>% Population Not Impacted</i>	99.25%	99.30%	99.21%	99.46%
<i>% Population Impacted</i>	0.75%	0.70%	0.79%	0.54%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.68%	0.70%	0.71%	0.54%

Table 20. Route 135 Onboard Survey Analysis

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/()	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/()
56%	64%	8%	52%	41%	N/A

The increase in service on this route would improve access to approximately the following jobs and key activity centers:

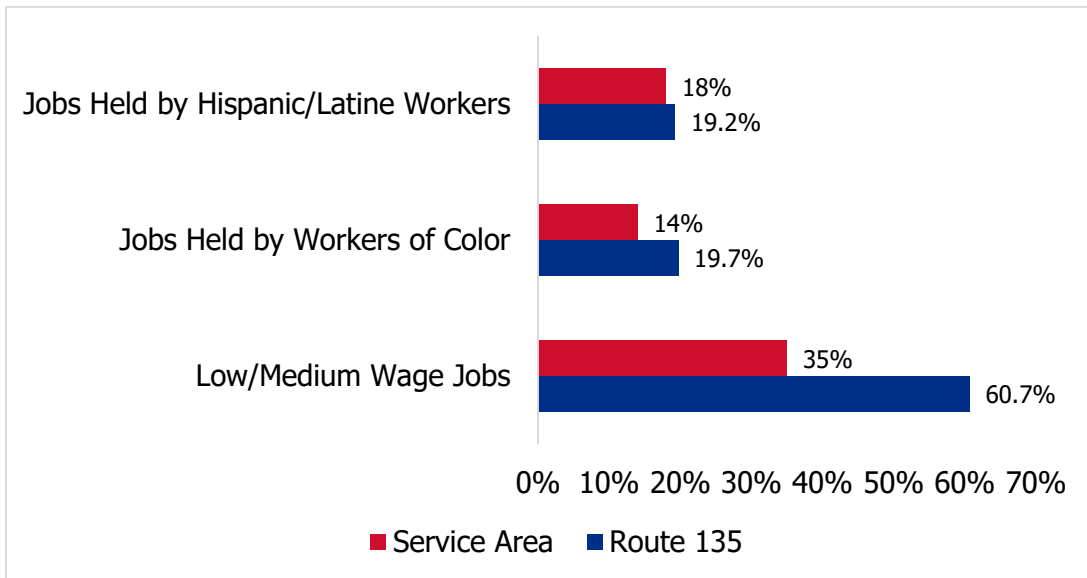
Table 21. Route 135 Improved Access to Jobs and Key Activity Centers

Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
4,121 jobs	51	9	5	7	30

As **Table 21** illustrates, the improvements on Route 135 would improve access to 4,121 jobs. Of these, 60.7% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 9). Additionally, 19.7% of the jobs are held by BIPOC workers (above the service area average of 14%), while 19.2% are held by Hispanic/Latine workers — higher than the service area average of 18%.

Service Equity Analysis: August 2025

Figure 9. Impact of Changes to Route 135 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



Route 327

Proposal: Extend the hours of operation on weekdays and Saturdays to 7:00 p.m., while also making minor changes to schedule. The change would address the needs of transit-dependent workers in Longmont, match operation hours of routes 324 and 326, allow for improved connections, and improve on-time performance.

As shown in **Table 22**, a slightly higher percentage of the service area’s low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (0.74% vs. 0.42%, respectively). This difference meets the 10% DB threshold (0.38%). Therefore, no potential route-level DB is found. A higher percentage of the service area’s BIPOC population benefits from the proposed major service increase as compared to the non-BIPOC population (0.60% vs. 0.41%, respectively). This difference meets the 10% DI threshold (0.37%). Thus, there is no potential DI found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and system-level analysis).

The onboard survey analysis for this route, shown in **Table 23**, shows that 54% of customers identify as BIPOC and 81% identify as low-income. However, the sample size does not meet the threshold for statistical validity for either group. Therefore, no further analysis by race or income will be conducted using this ridership data.

Table 22. Route 327 DI and DB Analysis

Route 327				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	7,877	7,006	10,220	4,550
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
% Population Not Impacted	99.59%	99.40%	99.58%	99.26%
% Population Impacted	0.41%	0.60%	0.42%	0.74%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.37%	0.60%	0.38%	0.74%

Table 23. Route 327 Onboard Survey Analysis

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/()	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/()
56%	54%	N/A	52%	81%	N/A

Service Equity Analysis: August 2025

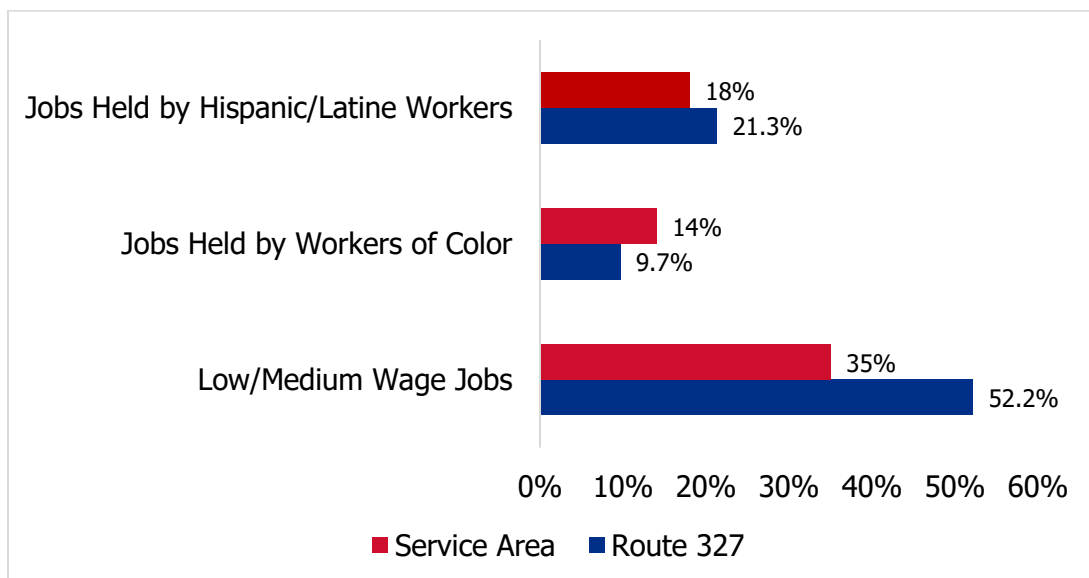
The increase in service on this route would improve access to approximately the following jobs and key activity centers:

Table 24. Route 327 Improved Access to Jobs and Key Activity Centers

Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
4,740 jobs	44	21	0	9	14

As **Table 24** illustrates, the changes to Route 327 would improve access to 4,740 jobs. Of these, 52.2% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 9). Additionally, 9.7% of the jobs are held by BIPOC workers (below the service area average of 14%), while 21.3% are held by Hispanic/Latine workers — higher than the service area average of 18%.

Figure 9. Impact of Changes to Route 327 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



Route LX2

Proposal: Add three southbound morning peak and two evening peak trips, as well as two northbound morning peak and three evening peak trips, per the System Optimization Plan.

As shown in **Table 25**, a higher percentage of the service area’s low-income population stands to benefit from the proposed major service increase as compared to non-low-income population (0.68% vs. 0.48%, respectively). This difference meets the 10% DB threshold (0.43%). Therefore, no potential route-level DB is found. An equal percentage of the service area’s BIPOC and non-BIPOC populations benefit from the proposed major service increase (0.52%); thus, no potential DI is identified at the route level.

No onboard surveys were conducted for the LX2 route, as shown in **Table 26**. Therefore, no analysis by race or income will be conducted using ridership data.

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Table 25. LX2 DI and DB Analysis

Route LX2				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	9,861	6,124	11,658	4,198
Service Area Population	1,906,309	1,173,838	2,609,568	427,622
Service Area Total Base Population	3,080,147		3,037,190	
% Population Not Impacted	99.48%	99.48%	99.52%	99.32%
% Population Impacted	0.52%	0.52%	0.48%	0.68%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.47%	0.52%	0.43%	0.68%

Table 26. Route LX2 Onboard Survey Analysis

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/(-)	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/(-)
56%	N/A	N/A	52%	N/A	N/A

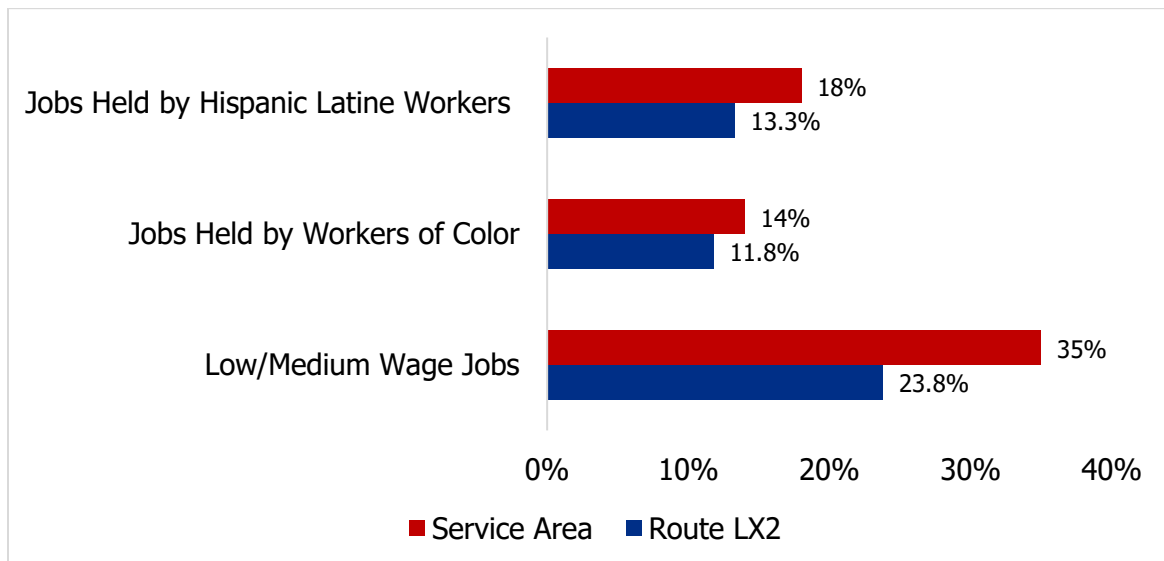
The increase in service on this route would improve access to approximately the following jobs and key activity centers:

Table 27. Route LX2 Increase Impacted Access to Jobs and Key Activity Centers

Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
30,017 jobs	86	41	1	18	26

As **Table 27** illustrates, the service increase for LX2 would affect access to 30,017 jobs. Of these, 23.8% are low-to-medium wage jobs — below the RTD service area average of 35% (Figure 10). Additionally, 11.8% of the jobs are held by BIPOC workers (below the service area average of 14%), while 13.3% are held by Hispanic/Latine workers — lower than the service area average of 18%.

Figure 10. Impact of Changes to LX2 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



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Route FF2

Proposal: Add three eastbound morning peak and two evening peak trips, as well as westbound two morning peak and three evening peak trips, to address occurring overloads, between 7:00 a.m. and 8:30 a.m. as well as 4:00p.m. and 5:30p.m. on weekdays.

As shown in **Table 28**, a higher percentage of the service area’s low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (1.20% vs. 0.67%, respectively). This difference meets the 10% DB threshold (0.60%). Therefore, no potential route-level DB is found. A lower percentage of the service area’s BIPOC population stands to benefit from the proposed major service increase as compared to the non-BIPOC population (0.71% vs. 0.95%, respectively). This difference does not meet the 10% DI threshold (0.86%). Thus, there is a potential DI found at the route level requiring further examination (i.e., access to key public service destinations, community engagement, and system-level analysis).

Further, the route-level analysis from the ridership data indicates a lesser share of boardings are made up of BIPOC customers, at 43%, and low-income customers, at 37%, shown in **Table 29**.

Table 28. FF2 DI and DB Analysis

Route FF2				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	18,195	8,293	16,133	7,395
Service Area Population	1,906,309	1,173,838	2,422,445	614,745
Service Area Total Base Population	3,080,147		3,037,190	
<i>% Population Not Impacted</i>	99.05%	99.29%	99.33%	98.80%
<i>% Population Impacted</i>	0.95%	0.71%	0.67%	1.20%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.86%	0.71%	0.60%	1.20%

Table 29. Route FF2 Onboard Survey Analysis⁵

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/()	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/()
56%	43%	(13.4%)	52%	37%	(15.2%)

The increase in service on this route would improve access to approximately the following jobs and key activity centers:

Table 30. Route FF2 Improved Access to Jobs and Key Activity Centers

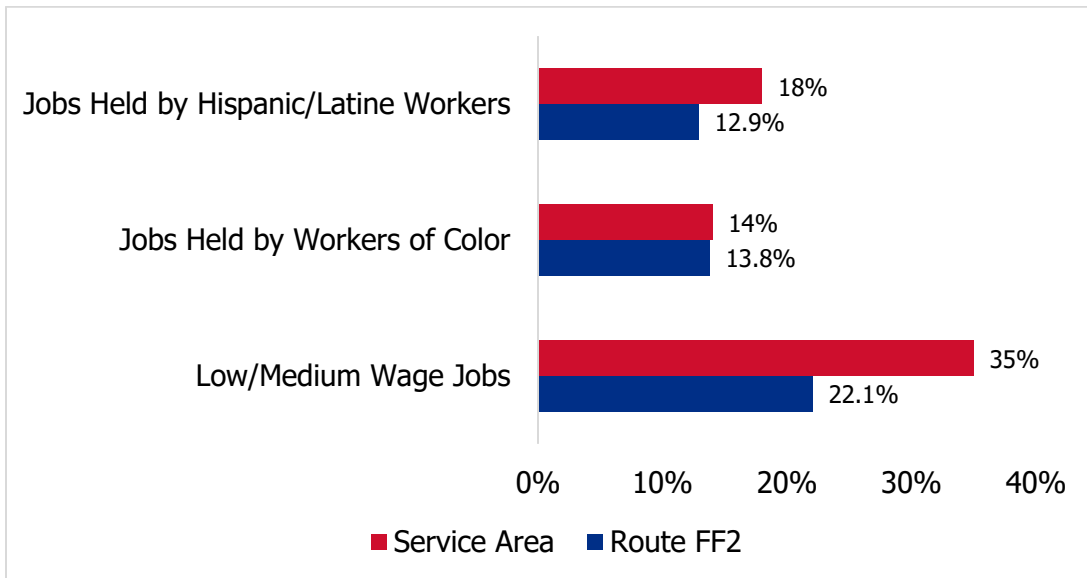
Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
52,434 jobs	82	47	2	12	21

As **Table 30** illustrates, the service increases of Route FF2 would affect access to 52,434 jobs. Of these, 22.1% are low-to-medium wage jobs — above the RTD service area average of 35% (Figure 11). Additionally, 13.8% of the jobs are held by BIPOC workers (slightly below the service area average of 14%), while 12.9% are held by Hispanic/Latine workers — higher than the service area average of 18%.

⁵Overall FF Route survey results are not broken down by individual route.

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Figure 11. Impact of Changes to FF2 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



Route FF4

Proposal: Reinstate Route FF4 by adding four peak period trips in each direction.

As shown in **Table 31**, a higher percentage of the service area’s low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (1.29% vs. 0.58%, respectively). This difference meets the 10% DB threshold (0.05%). Therefore, no potential route-level DB is found. A lower percentage of the service area’s BIPOC population stands to benefit from the proposed major service increase as compared to the non-BIPOC population (0.64% vs. 0.82%, respectively). This difference does not meet the 10% DI threshold (0.74%). Thus, there is a potential DI found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and system-level analysis).

Further, the route-level analysis from the ridership data indicates a lesser share of boardings are made up of BIPOC customers, at 43%, and low-income customers, at 37%, shown in **Table 32**.

Table 31. FF4 DI and DB Analysis

Route FF4				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	15,653	7,499	14,136	7,935
District Population	1,906,309	1,173,838	2,422,445	614,745
District Total Base Population	3,080,147		3,037,190	
% District Population Not Impacted	99.18%	99.36%	99.42%	98.71%
% District Population Impacted	0.82%	0.64%	0.58%	1.29%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.74	0.64	0.05	1.29

Table 32. Route FF4 Onboard Survey Analysis

BIPOC Service Area Average	BIPOC Population	BIPOC Population Route Difference +/(-)	Low Income Service Area Average	Low Income Population	Low Income Population Route Difference +/(-)
56%	43%	(13.4%)	52%	37%	(15.2%)

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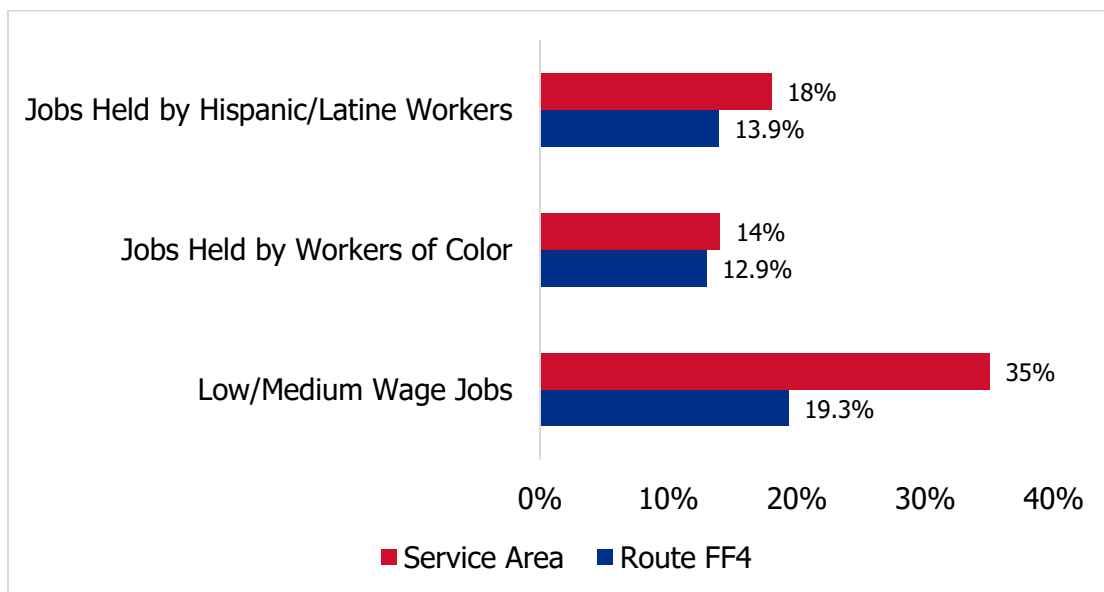
The reinstatement of this route would increase access to approximately the following jobs and key activity centers:

Table 33. Route FF4 Improved Access to Jobs and Key Activity Centers

Employment Access to Jobs	Total Key Activity Centers	Human and Social Service Centers	Senior Housing and Facilities	Academic Institutions Colleges and K 12 Schools	Retail and Convenience Stores Includes Grocers
102,848	144	96	1	12	35

As **Table 33** illustrates, the reinstatement of Route FF4 would increase access to 102,848 jobs. Of these, 19.3% are low-to-medium wage jobs — below the RTD service area average of 35% (Figure 12). Additionally, 12.9% of the jobs are held by BIPOC workers (below the service area average of 14%), while 13.9% are held by Hispanic/Latine workers — lower than the service area average of 18%.

Figure 11. Impact of Changes to FF4 on Access to Low/Medium Wage Jobs, Jobs Held by Workers of Color, and Jobs Held by Hispanic/Latine Workers



Systemwide Analysis

In accordance with RTD’s 2025-2028 Title VI Program, a systemwide analysis is required in addition to route- and line-level analyses. A system-level analysis provides further understanding of changes to service levels for BIPOC and low-income populations at aggregate levels.

The major service change threshold of 25% or greater used for individual route-level analyses was used as precedent to determine potential adverse impacts overall and to identify structural issues in areas requiring further review. Once average service area thresholds for BIPOC and low-income populations are established, subsequent equity analyses focused on the subset of service area block groups that experienced major service changes of 25% or greater (additions or reductions in service), and whether equity block groups with major service changes experienced service changes of 10% or more compared to non-equity block groups. Routes with major service changes are later comparatively reviewed for potential adverse effects at route-block group levels (block groups within route service areas).

The analysis of all service changes identified the following:

- Of the nearly 201,000 people served by stops within the service area with major service increases, BIPOC and low-income populations represented an above-average share of population compared to service area averages. Of this total, over 89,000 BIPOC people and over 57,000 low-income people would receive service improvements.
- Of the nearly 24,000 people impacted by the major service decreases (Routes 30 and 35), BIPOC and low-income populations represented an above average share of population while low-income populations represented a slightly above average share of population compared to the service area averages. Of this total, over 9,000 BIPOC people and over 5,000 low-income people would be negatively impacted by the

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service decreases. Routes 29 and 38 were excluded from the systemwide analysis as the coverage of service are recouped by the Routes 30 and 34, respectively.

- At the systemwide level, equity routes and non-equity routes⁶ were compared only for those with major service changes. A majority of bus routes with major service increases serve above-average BIPOC and low-income populations. Six of the eight routes are considered low-income-serving routes, while five of the eight routes are considered BIPOC-serving routes. Two bus routes with major service decreases serve above above-average BIPOC and low-income populations. Both are considered BIPOC and low-income-serving routes

In review of the proposed major service increases at the systemwide level, there is not a potential DI or DB finding. In review of the proposed major service decreases at the systemwide level, there is a potential DI or DB finding.

An analysis of all service area block groups and their service levels was conducted to establish the baseline equity thresholds for BIPOC and low-income populations and to determine the systemwide magnitude of impacts of the **August 2025** service change. Block groups with BIPOC and low-income populations at or above the service area average are referred to in this analysis as “equity” block groups whereas block groups with non-BIPOC and non-low-income populations are referred to as “non-equity” block groups.

Systemwide Analysis Process

Determine block groups at/above service area averages for low-income population (20.3%) and BIPOC population (38.1%)

Determine which block groups experienced service changes of 25% or more

Of block groups with a major service change, compare the difference in population for equity versus non-equity block groups; if the difference is more than 10%, review for potential adverse impacts

As illustrated in **Table 34**, there are 2,220 block groups defined as being wholly within or mostly within the District.⁷ Using the 2019-2023 5-Year ACS Estimates, total population residing within these block groups was calculated as well as the total BIPOC population and total low-income population, calculated separately, to determine the District-wide low-income and BIPOC rates which set the thresholds for which block groups are classified as above average. While the percent BIPOC Figure of 38.1% was derived by using the base population of the service area (3.08 million), the low-income population percentage of 20.3% is derived from a slightly smaller population figure (3.04 million). This is due to the smaller population whose poverty status the Census Bureau can determine.⁸

Table 34. District Averages (NTD 2023 and ACS 2019-2023 5-Year Estimates)

Service Area (sq. miles)	Total Block Groups	Total Population	Percent BIPOC	Total Population (Income assessed)	Percent Low Income
2,345	2,220	3,080,147	38.1%	3,037,190	20.3%

The proposed major service changes were examined in aggregate to determine overall impacts to underlying population. **Table 35** summarizes the change in service for total block group populations underlying the bus stops with proposed major service **increases** proportionally compared to population in the District. **Table 36** summarizes the change in service for total block group populations underlying the bus stops with proposed major service **decreases** proportionally compared to the population in the District. The comparison reviews the equity composition of those who may be impacted by proposed service changes compared to the overall equity composition of the District overall.

⁶ Based on existence of the route within the August 2025 network and the population within a quarter mile of bus stops or rail stations. 2019-2023 5-Year ACS estimates were used for population identification.

⁷ Some block groups are not completely contained within district boundaries due to differences in boundaries between the District and Census-defined geographies.

⁸ The total population whose poverty status is determinable/assessed is lower than the estimate of total population due to the inability of the Census to determine income for everyone estimated to reside in a particular block group.

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No major service changes were proposed for rail services in this runboard.

Table 35. Systemwide DI and DB Equity Analysis Summary for All Major Service Increases

Systemwide DI and DB Analysis: All Increases				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Impacted Block Group Population	111,942,265	89,016	137,800	57,297
District Population	1,906,309	1,173,838	2,422,445	614,745
District Total	3,080,147		3,037,190	
% District Population Not Impacted	94.1%	92.4%	94.43%	90.70%
% District Population Impacted	5.47%	7.58%	5.69%	9.32%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	5.28%	7.58%	5.12%	9.32%

For system-level service increases, **BIPOC populations stand to benefit more than non-BIPOC populations** (7.58% vs. 5.74%, respectively). This difference does not meet the DI threshold of 5.28%. Therefore, a system-level DI finding is not found with the proposed major service increase. **Low-income populations stand to benefit more than non-low-income populations** (9.32% vs. 5.69%, respectively). The difference does not meet the 10% DB threshold of 6.12%. Therefore, no system-level DB is found with the proposed major service increase.

Table 36. Systemwide DI and DB Equity Analysis Summary for All Major Service Decreases

Systemwide DI and DB Analysis: All Decreases				
	Non-BIPOC Population	BIPOC Population	Non-Low-Income Population	Low-Income Population
Impacted Block Group Population	13,293	9,941	17,914	5,051
District Population	1,906,309	1,173,838	2,422,445	614,745
District Total	3,080,147		3,037,190	
% District Population Not Impacted	99.3%	99.2%	99.3%	99.2%
% District Population Impacted	0.70%	0.85%	0.74%	0.82%
Thresholds	DI		DB	
<i>DI and DB thresholds are 90% for service increases and 110% for service decreases</i>	<i>DI Threshold</i>	<i>Impacted Population</i>	<i>DB Threshold</i>	<i>Impacted Population</i>
	0.77%	0.85%	0.81%	0.82%

For system-level service decreases (excluding populations affected by Routes 29 and 38), **BIPOC populations stand to benefit less than non-BIPOC populations** (0.85% vs. 0.70%, respectively). This difference meets the DI threshold of 0.77%. Therefore, a system-level DI finding is found with the proposed major service decrease. **Low-income populations stand to benefit less than non-low-income populations** (0.82% vs. 0.74%, respectively). The difference does not meet the 10% DB threshold of 0.81%. Therefore, a system-level DB is found with the proposed major service decrease.

Summary of Findings

The proposed major service changes for August 2025 include a mix of service increases and decreases, with route adjustments impacting frequency, span of service, and route miles. These changes affect multiple routes across the RTD system. Overall, the proposed service changes show both benefits and potential impacts at the system and route levels.

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Major Service Change Results

Table 37. Criteria Met for Major Service Change

Route/Line	Change in Service Hours	Change in Frequency	Change in Span	Change in Route Length	New or Reinstated Service	Discontinued Service
29						X
30	X		X			
35	X	X		X		
36	X	X				
135	X	X				
327			X			
FF2	X	X	X			
FF4					X	
LX2					X	

Note: X indicates the 25% threshold was met requiring route and systemwide level analyses

Route/Line-level Findings

Of the 58 total services with proposed changes, taken individually, **six had potential findings:**

- **Route 29:**
 - **ACS Data:** Potential DI and DB identified
 - **Ridership Data:** 69% BIPOC customers (greater share) and 82% low-income customers (greater share; low-income sample not statistically valid)
- **Route 30:**
 - **ACS Data:** Potential DI for the proposed decrease; no DB
 - **Ridership Data:** 66% BIPOC customers (greater share) and 76% low-income customers (greater share)
- **Route 35:**
 - **ACS Data:** Potential DB for the proposed decrease; no DI
 - **Ridership Data:** 64% BIPOC customers (greater share) and 60% low-income customers (moderate share)
- **Route 135:**
 - **ACS Data:** Potential DB; no DI.
 - **Ridership Data:** 64% BIPOC customers (greater share); low-income sample (41%) not statistically valid (lesser share)
- **Route FF2:**
 - **ACS Data:** Potential DI
 - **Ridership Data:** 43% BIPOC customers (lesser share) and 37% low-income customers (lesser share)
- **Route FF4:**
 - **ACS Data:** Potential DI.
 - **Ridership Data:** 43% BIPOC customers (lesser share) and 37% low-income customers (lesser share)

Systemwide-level Findings

- Over 200,000 people live near bus stops of routes with major service increases. BIPOC populations represent nearly six percentage points higher than the service area average (44.30%) and low-income populations represent nine percentage points higher than the service area average (29.37%).
- Nearly 24,000 people live near bus stops of routes with major service decreases. BIPOC populations represent nearly five percentage points higher than the service area average (4.69%) and low-income populations represent nearly two percentage points higher than the service area average (1.69%).
- No system level DI or DB for the eight major service increases. BIPOC populations received 1.71% more of a benefit compared to non-BIPOC areas. The difference was above the DI threshold by 2.30%; therefore, **no potential systemwide DI was found**. Low-income populations received 3.63% more

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benefit than non-low-income populations. The difference was 4.20% above the threshold for a potential DB; therefore, **no potential DB was found with the proposed service increase**. As a result, a greater share of the service area's BIPOC and low-income populations stand to benefit from the service increases as compared to non-BIPOC and non-low-income populations.

- System level DI and DB finding for the two major service decreases (Routes 30 and 35). Specifically, a slightly greater percentage of BIPOC populations are more likely to be negatively impacted from the decreases than non-BIPOC populations (0.85% vs. 0.70%, respectively). Likewise, a slightly greater percentage of low-income populations are more likely to be negatively impacted from the decreases than non-low-income populations (0.82% vs. 0.74%, respectively).

Next Steps for DI and DB Findings

Given a potential DI or DB, RTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, RTD will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential DI and DB, or
- b) Provide a substantial legitimate justification for keeping the proposal as-is and show that there are no alternatives that would have a less DI on BIPOC customers or DB on low-income customers but would still accomplish the project or program goals.

RTD conducted a thorough equity analysis of the proposed August 2025 service changes, assessing both route-level and systemwide impacts. While several individual changes result in potential DI's or DB's RTD concludes that the service plan, as a whole, does not result in an inequitable distribution of benefits or burdens. Where possible, RTD has taken steps to mitigate these impacts and has determined that the remaining impacts are justified and operationally necessary.

Service Increases

Although two proposed major service increases, Routes FF2 and FF4, result in potential DI, and one (Route 135) results in a potential DB, RTD recommends proceeding with the proposed improvements. These findings do not raise concerns of inequitable benefit distribution due to:

- The results of the systemwide analysis, which shows overall benefit to equity populations;
- The absence of DI's or DB's on the remaining eight routes with proposed service increases; and
- The strong legitimate justification for the improvements, aligned with the Board-approved System Optimization Plan and the lack of viable alternatives that would avoid or reduce the identified impacts.

Route 29 – Service Decrease

The proposed elimination of Route 29 results in a potential DI and DB. However, this route is proposed to be fully replaced by a revised Route 30, with no loss in frequency or coverage. As such, impacts to affected populations, jobs, and Key Activity Centers are mitigated. Given that alternative service is maintained, equity concerns are considered minimal, and RTD recommends proceeding as proposed.

Route 30 – Western Segment Elimination

The elimination of Route 30's western segment results in a route-level DI. While a proposed reroute of Route 35 will replace most of the eastbound service from Wadsworth/Hampden Park-n-Ride to West Yale Avenue/South Hooker Street, two of the five stops between West Dartmouth Avenue/South Raleigh Street and South Lowell Boulevard/West Linvale Place exceed a quarter-mile from the nearest available service and will lose coverage. Per RTD's DI Policy, the agency evaluated modifications to avoid, minimize, or mitigate these impacts. At this time, no practical alternatives have been identified. RTD will continue to monitor this area and revisit potential solutions in future service planning.

Route 35 – Reroute

The proposed reroute of Route 35 results in a DB due to the loss of service coverage in specific areas. Although Route 76 will help offset the change by providing alternative service from Southwest Plaza to South Wadsworth Boulevard/West Mansfield Avenue and westbound from West Jefferson Avenue/South Wadsworth Boulevard to Southwest Plaza, five of the 11 eastbound stops between West Jefferson Avenue and West Dartmouth Avenue exceed a quarter-mile from available service. RTD evaluated alternatives but found no operationally feasible routing options that would fully restore coverage. In alignment with the DB Policy, RTD will continue exploring mitigation strategies during subsequent planning efforts.

Service Equity Analysis: August 2025

Conclusion

While isolated DI's and DB's have been identified, RTD finds that the service plan does not result in an overall inequitable distribution of benefits or burdens. Impacts have either been mitigated through complementary service changes or are supported by substantial legitimate justification aligned with agency goals. RTD recommends proceeding with the August 2025 service changes as proposed and remains committed to monitoring these areas and engaging communities to identify future adjustments where feasible.