

Title VI

2022 Program Update

Prepared in accordance with the requirements specified in the Federal Transit Administration (FTA) Circular 4702.1b, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." Dated October 1, 2012

Submitted: January 31, 2023

Prepared by:

Sun Metro 10151 Montana Ave. El Paso, Texas 79925

Tel: (915) 212-3300 URL: sunmetro.net

Table of Contents

INTRODUCTION	1
GENERAL REQUIREMENTS	3
CITY OF EL PASO – SUN METRO POLICIES AND PROCEDURES	5
SUN METRO'S PUBLIC PARTICIPATION PLAN	7
TRANSPORTATION POLICY BOARD APPROVED MEETING MINUTES	10
SUN METRO'S PUBLIC PARTICIPATION PROCESS	11
LIMITED ENGLISH PROFICIENCY PLAN	16
DECISION MAKING BODIES	
SERVICE STANDARDS AND POLICIES	25
PROGRAM SPECIFIC REQUIREMENTS	34
TITLE VI EQUITY ANALYSIS POLICIES AND PROCEDURES	35
SUN METRO TITLE VI EQUITY ANALYSIS POLICIES	38
SUN METRO SERVICE AND FARE MODIFICATIONS	40
MONITORING SYSTEM-WIDE PROGRAM SERVICE STANDARDS	40
2022 SUN METRO TRANSIT BOARDING/ALIGHTING AND ON-BOARD SURVEY	46
GRANTS, REVIEWS, AND CERTIFICATIONS	49
CONTACT	51
APPENDIX	52

INTRODUCTION

Sun Metro's Commitment to Civil Rights

This update of Sun Metro's Title VI Program has been prepared to ensure that the level and quality of Sun Metro's fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to Sun Metro's riders and other community members.

Additionally, through this program, Sun Metro has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. While it is a matter of principle that Sun Metro is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of Sun Metro's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

"No person shall, on the grounds 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 assistance."

-Civil Rights Act of 1964

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (USDOT), Sun Metro has an obligation to ensure that:

- The benefits of its public transit services are shared equitably throughout the service area;
- The level and quality of public transit services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in Sun Metro's service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- A program is in place to correct any intentional or unintentional discrimination.

The Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," effective October 1, 2012, requires that all FTA recipients operating 50 or more fixed route vehicles during peak service and serving a population of 200,000 or greater must evaluate service changes and their corresponding impacts on transit services to determine whether the planned changes will have a disparate impact on the basis of race, color, national origin or income.

The content of the Title VI Program was approved and adopted by the Mass Transit Board on January 18, 2023.

GENERAL REQUIREMENTS

Notice to Beneficiaries

To make Sun Metro's riders aware of its commitment to Title VI compliance and of their right to file a civil rights complaint, Sun Metro has presented various public materials in both English and Spanish. The materials include posters displayed at transit terminals and buses, in all transit schedules (timetables) and on its website at https://sunmetro.net/about/title-vi-and-dbe/.

- Al Jefferson Westside Transit Center 7535 Remcon Circle
- Glory Road Transfer Center 100 E. Glory Rd.
- Union Plaza Transit Terminal 400 W. San Antonio
- Five Points Transit Center 2830 Montana
- Bert Williams Downtown Santa Fe Transit Center 301 S. Santa Fe
- Northgate Transit Center 9348 Dyer
- Cielo Vista Transit Center 1165 Sunmount
- Upper East Side Transit Center 12781 Edgemere Blvd
- Mission Valley Transit Center 9065 Alameda

Title VI Notice to the Public

Title VI of the Civil Rights of 1964 and related statutes prohibiting discrimination in federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.

Any person who believes they have been harmed by an unlawful discriminatory practice regarding Sun Metro's programs has a right to file a formal complaint with Sun Metro. Any such complaint must be submitted in writing or via phone call to the Sun Metro Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence.

For more information regarding civil rights complaints, please contact:

Title VI Coordinator, Sun Metro 10151 Montana Ave, El Paso, Texas 79925 (915) 212-3333

Título VI Aviso al Público

El Título VI de la Ley de Derechos Civiles de 1964 prohíbe la discriminación por motivos de raza, color o país de origen en programas y actividades que reciben ayuda financiera Federal. Específicamente, el Título VI dispone que "ninguna persona en los Estados Unidos, por motivos de raza, color o país de origen, podrá ser excluida de participar, ser negada de beneficios o ser discriminada en ningún programa o actividad que recibe ayuda financiera Federal."

Cualquier persona que crea haber sido sujeto de una práctica ilegal discriminatoria en cuanto a los programas de Sun Metro, tiene el derecho de presentar una queja formal a Sun Metro. Cualquier denuncia debe ser hecha por escrito y presentada al Coordinador del Título VI de Sun Metro dentro de los ciento ochenta (180) días siguientes a la fecha del acontecimiento.

3

Coordinador del Título VI, Sun Metro 10151 Montana Ave, El Paso, Texas 79925 (915) 212-3333

Discrimination Complaint Procedures

Sun Metro has established a process for riders to file a complaint under Title VI. Any person who believes they have been discriminated against on the basis of race, color, or national origin by Sun Metro may file a Title VI complaint by completing and submitting the agency's Title VI Discrimination Complaint Form. Forms are available at our administrative offices or on our website at https://sunmetro.net/about/title-vi-and-dbe/





Active Lawsuits, Complaints or Inquiries Alleging Discrimination

As of the most current writing of this program, there are no complaints pending which alleges discrimination on the grounds of race, color, national origin or any other form of discrimination.

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Action(s) Taken
N/A		N/A	N/A

CITY OF EL PASO – SUN METRO POLICIES AND PROCEDURES

Subject: Title VI, Complaint Procedure

Sun Metro, the Mass Transit Department of the City of El Paso, is committed to a policy of nondiscrimination in its business, including its Title VI responsibilities – the delivery of equitable and accessible transportation services. Sun Metro recognizes its responsibilities to the communities in which it operates and the society it serves. It is Sun Metro's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit service delivery and related benefits.

If you believe that you have been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin under Sun Metro's program of transit service delivery or related benefits, you may file a written complaint to the Sun Metro Title VI Coordinator at 10151 Montana Ave, El Paso, Texas 79925 or submit a verbal complaint by telephone at (915) 212-3333. Attached you will find a complaint form. We encourage you to make your complaint in writing.

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The Title VI Coordinator will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigating officer will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

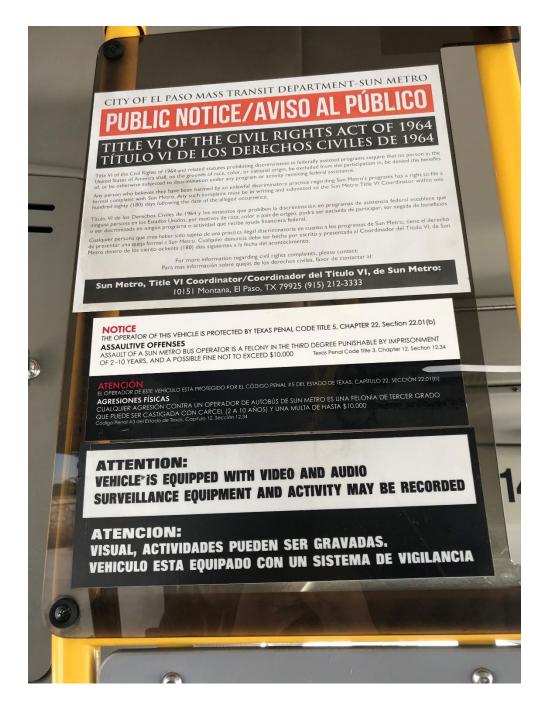
Upon completion of the investigation, the Title VI Coordinator will complete a final report for the Mass Transit Director. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a final report together with any remedial steps. The investigation process and final report should take no longer than twenty-five (25) business days. If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to:

Mass Transit Director 10151 Montana Ave El Paso, Texas 79925

Complaints may also be filed with the Federal Transit Administration's Office of Civil Rights, no later than 180 days after the date of the alleged discrimination,

Federal Transit Administration's Office of Civil Rights 819 Taylor Street, Room 14A02 Fort Worth, TX 76102 Telephone: (817) 978-0550

The Title VI Coordinator shall maintain a log of Title VI complaints received from this process which log shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by Sun Metro in response to the complaint. Should Sun Metro receive a Title VI complaint in the form of a formal charge or lawsuit, the City Attorney shall be responsible for the investigation and maintaining a log as described herein.



SUN METRO'S PUBLIC PARTICIPATION PLAN

Sun Metro utilizes El Paso Metropolitan Planning Organization's Public Participation Program (Revised September 17, 2021) and is available online at https://www.elpasompo.org/media/PublicParticipationPlan.pdf

MEETING OF THE TRANSPORTATION POLICY BOARD FOR THE EL PASO METROPOLITAN PLANNING ORGANIZATION (EPMPO)

To be held at El Paso MPO Office, 211 N. Florence Street, Suite 103 (Boardroom), El Paso, Texas 79901.

Friday September 17, 2021 at 9:00 A.M.

NOTICE OF MEETING AND AGENDA

COVID-19 Statement

Due to the ongoing COVID-19 pandemic, social distancing measures will be enforced for those present in the boardroom during the EPMPO Transportation Policy Board (TPB) meeting scheduled for September 17, 2021. Furthermore, all members of the public present in the boardroom will be required to comply with state and local health measures.

Public Participation and Public Comment

Members of the public may attend the meeting in person; however, seating capacity in the boardroom will be limited for the reasons stated above. Members of the public are encouraged to participate in the meeting by calling the meeting through TEAMS. The instructions on how to join the meeting via TEAMS are available at: https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:65fea628-945e-4970-a5f7-69fb18ebd842

Atención. Si desea recibir asistencia gratuita para traducir esta información, llame al 915-212-0258.

- CALL MEETING TO ORDER AND PLEDGE OF ALLEGIANCE
- ROLL CALL
- PUBLIC COMMENT PERIOD

(The agenda and backup materials for the meeting packet are posted and available on the MPO webpage:

DISCUSSION AND ACTION TO:

1. Approve the minutes of the July 23, 2021 EPMPO TPB meeting	hair
DISCUSSION AND ACTION TO APPROVE RECOMMENDATIONS FROM THE TRANSPORTATION PROJECT ADVISOR COMMITTEE:	<u>!Y</u>
Approve Regional Mobility Strategy (RMS) 2050 Metropolitan Transportation Plan (MTP) Draft Financially Constrained Project List including Sunland Park Port of Entry and connect roadways Project subject to the City of Sunland Park submitting to the El Paso MPO a formal commitment letter agree to fund the Port of Entry Project as well as connecting roadways.	cting
Approve the September 2021 Project Readiness Report (PRR). TPAC C Approve the amended Public Participation Plan (PPP). TPAC C TPAC C	
REPORTS AND DISCUSSION: 5. Congestion Management Process (CMP) Segment Performance Analysis. MP 6. Highway Emergency Response Operator (HERO) Program. TXDC	

SECTION 3. GOALS AND PRINCIPLES OF THE PUBLIC PARTICIPATION PLAN

This Public Participation Plan (PPP) is to serve as a program guide for the public participation process of the El Paso Metropolitan Planning Organization (MPO). The PPP provides the MPO policies and principles that guide its communications and coordination with interested parties such as: residents, neighborhood associations, private and public agencies, and transportation providers, and other members of the public. Additionally, the PPP serves as a tool for planners and decision-makers to engage residents, community groups, organizations, and businesses in the process of planning the transportation system.

GOALS AND PRINCIPLES OF THE PUBLIC PARTICIPATION PLAN

The goal of the Public Participation Plan (PPP) is to include residents, community and neighborhood groups and associations, non-profit groups, business sector groups, transportation providers, federal, state, and local government agencies, and many others to participate in a proactive, predictable planning effort that provides full access to making key transportation decisions early and during the process. Accomplishing the task of planning for transportation needs in the present day, five, ten and even twenty years from now, requires the MPO to coordinate and collaborate with many types of public and private groups to provide mobility to housing, schools, jobs, recreation, and freight movement. Involving the public in the planning process helps reduce the time and cost of creating short and long-range plans and projects while providing a forum for public input and collaboration with planning agencies. This allows the public the opportunity to voice their ideas, concerns, issues, and opinions and to help guide decision-makers in determining the transportation system of the future. Public involvement processes must be appropriate, accessible, transparent, accountable, meaningful and inclusive of the region's diverse population and its needs.

PRINCIPLES OF THE EL PASO MPO'S PUBLIC PARTICIPATION PROGRAM

- Equal access is an essential part of the public involvement process.
- No major public policy decision is reached or large project implemented without significantly affecting someone.
- Professionals do not have a monopoly on good solutions.
- People are much more willing to live with a decision that affects different interests unequally
 if the decision-making process is open, objective, and considers all viewpoints.
- Interacting with an official representative of an organization or group is no substitute for interacting directly with that organization or group.
- Effective public notification and participation takes time and effort, and can be expensive, yet is essential to sound decision-making.

TRANSPORTATION POLICY BOARD **APPROVED MEETING MINUTES**

On September 17, 2021

4. Approve the amended Public Participation Plan (PPP).

Motion to approve the amended Public Participation Plan (PPP) made by Alderman Walter Miller, and seconded by Representative Cassandra Hernandez. Motion passed unanimously.

RESOLUTIONS

TRANSPORTATION POLICY BOARD
FOR THE
EL PASO METROPOLITAN PLANNING ORGANIZATION
Approved at the Meeting on September 17, 2021

- 1. Approved the minutes of the July 23, 2021 EPMPO TPB meeting
- Approved Regional Mobility Strategy (RMS) 2050 Metropolitan Chair Transportation Plan (MTP) Draft Financially Constrained Project List including Sunland Park Port of Entry and connecting roadways Project subject to the City of Sunland Park submitting to the El Paso MPO a formal commitment letter agreeing to fund the Port of Entry Project as well as connecting roadways. as connecting roadways.
 3. Approved the September 2021 Project Readiness Report (PRR)
 4. Approved the amended Public Participation Plan (PPP)

APPROVED AND ENTERED THIS 17th DAY OF SEPTEMBER 2021.

Lina Ortega
Transportation Policy Board Chairperson

APPROVED AS TO FORM:

Sergio Estrada, General Counsel El Paso Metropolitan Planning Organization

APPROVED AS TO CONTENT:

Eduardo Calvo, Executive Director El Paso Metropolitan Planning Organization

SUN METRO'S PUBLIC PARTICIPATION PROCESS

Outreach Efforts – Alerting Riders and Encouraging Engagement

Sun Metro's Public Participation Process includes many new mediums extending beyond the traditional approach, which relied on legal notices and intermittent media coverage. While Sun Metro maintains these elements in its outreach program along with traditional seat-drop flyers, Sun Metro has availed itself of the communication methods more widely used by community members and riders.

While there may be minor variations in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision-making process using a fare or service change as an example.

- 1. A service/fare change proposal is developed internally or as a result of public comment;
- 2. An internal review by the appropriate department is conducted (for example, Sun Metro's Finance, Planning, and Operations Divisions);
- 3. Proposals are reviewed by Sun Metro's Citizen's Advisory Committee (C.A.C.);
- 4. A Title VI review of the proposal is conducted;
- 5. Public outreach venues, dates, and times are determined with consideration of the proposed changes and their impact on specific locations/populations within Sun Metro's service area;
- 6. Bilingual (English and Spanish) public outreach materials and a program are developed;
- 7. Outreach in advance of public information sessions is released (using the tool-box of media listed below);
- 8. The 30 (service modifications) and 45 (fare adjustments) calendar days public comment period ends;
- 9. Sun Metro presents the outcome of the public participation process along with staff recommendations to the Citizens' Advisory Committee and to the Mass Transit Board;
- 10. The final service/fare change date is set;
- 11. Outreach is conducted in advance of any service or fare change;
- 12. Bilingual (English and Spanish) system timetable and website updated in advance of the proposed change.

Selections of Meeting Locations

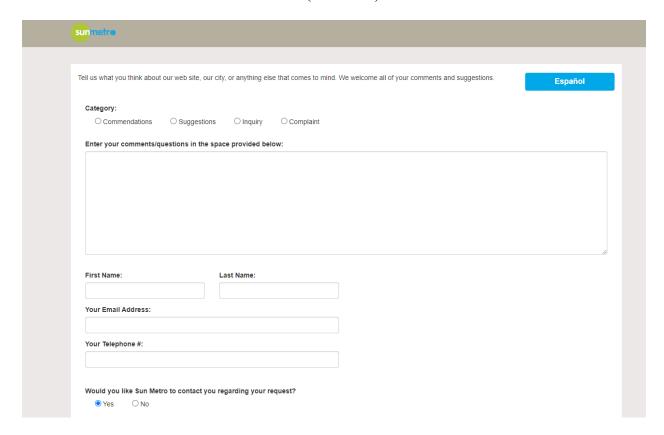
When determining locations and schedules for public meetings, Sun Metro will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall-type meeting formats;

- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, or newspaper ads, and podcasts serving LEP populations.
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or the use of audio or video recording devices to capture oral comments.

Sun Metro Media (Bi-lingual)

- Print Newspapers and other periodicals
- Outdoor Advertising on-board buses (interior) and in bus shelters
- Website Sun Metro has assembled a comprehensive website with automatic alerts
- Web-based Feedback Online form (see below)

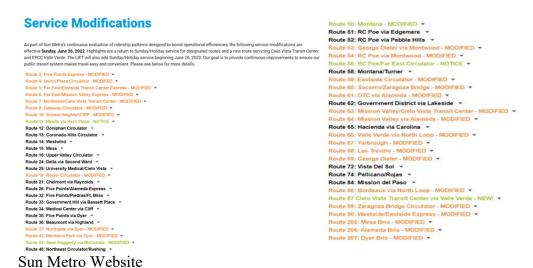


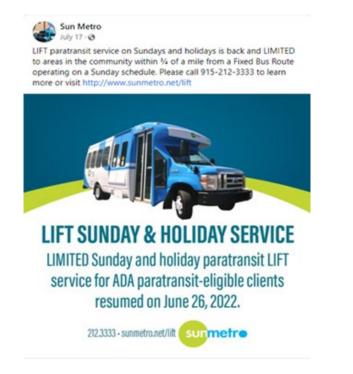
- Radio (if available and appropriate)
- On-board Scrolling Messages
- On-board Audio Messaging
- Terminal Public Address System and Scrolling Messages
- Direct Mail to Community Partners
- Public Hearings

- Public Information Sessions
- Legal Notices

Sun Metro provides United States Census Bureau's "I Speak" cards at the sign-in table for any community outreach meeting and at the customer service centers to ascertain a possible future need for interpreter services.

 Social Media – Sun Metro has used Twitter and Facebook since 2010 to help engage the community.







Sun Metro will be modifying our discounted fare for seniors and people with disabilities starting October 1, 2022. The new fares will be 50 cents. The standard bus fare of \$1.50 will remain unchanged. The fare will apply to LIFT customers who ride Fixed Route. LIFT Service fare of \$2.50 will remain unchanged. For more information, visit www.SunMetro.net or call (915) 212-3333 during regular business hours.

#SunMetro #EIPasoTexas #EPTX #IAmEIPaso City of EI Paso, Texas - Municipal Government



Now offering NEW Extended Service hours! Today marks the first day of the El Paso Streetcar's new schedule. We are excited to now operate Wednesday-Sunday. Plan ahead and track the Streetcar today by using the free Ride Sun Metro app.

New Schedule: Wed. – Sat. | 3 pm – 10 pm Sunday | 12 pm – 6 pm ... See more





LIFT customers: Online planning temporarily suspended for system upgrades. Please call 915.212.0100 for reservations up to 7 days in advance Monday-Saturday 8am-5pm.



Clientes del LIFT: La programación de viajes en línea se ha suspendido temporalmente para implementar mejoras necesarias. Favor de llamar al 915.212.0100 para hacer reservas con hasta 7 días de anticipación de lunes a sábado, 8am-5pm.



CHANGES TO APPOINTMENT SCHEDULING SERVICES Online and mobile trip scheduling

Online and mobile trip scheduling suspended until further notice to allow for much-needed upgrades.

PLAN YOUR TRIP BY CALLING 915.212.0100

To help with scheduling, reservations may now be made up to 7 days in advance MONDAY-SATURDAY 8AM TO 5PM

EFFECTIVE SEPTEMBER 18, 2022 Call Center hours to be extended SUNDAY-SATURDAY 8AM TO 5PM

ATENCIÓN LIFT

CAMBIOS EN LOS SERVICIOS DE PROGRAMACIÓN DE CITAS

La programación de viajes en línea se ha suspendido temporalmente para implementar las mejoras necesarias.

PLANIFIQUE SU VIAJE LLAMANDO AL 915.212.0100

Para facilitar la programación, las reservas se pueden hacer con hasta 7 días de anticipación DE LUNES A VIERNES 8AM A 5PM

A PARTIR DEL 18 DE SEPT., 2022 Se extenderá el horario del centro de reserva DE DOMINGO A SÁBADO DE 8AM A 5PM

Addressing Comments

The Incorporation of Public Comments into Decisions

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways riders or community members can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments are assembled into a single document for presentation to the Mass Transit Board for consideration.

LIMITED ENGLISH PROFICIENCY PLAN

Improving Access for People with Limited English Proficiency

The USDOT defines Limited English Proficiency (LEP) as persons who do not speak English as their primary language and who have limited ability to read, write, or understand English.

Executive Order 13166 - In 2000, President William J. Clinton signed Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency."

The order provided clarification of Title VI in the Civil Rights Act of 1964, stating that recipients of federal funds must "ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin."

The order also required federal agencies and recipients of federal financial assistance to examine the services they provide and develop an implementation plan to provide meaningful access to LEP persons.

Guidance from the Federal Highway Administration, Federal Transit Administration and the Texas Department of Transportation stresses the importance of reducing language barriers that can prevent meaningful access by LEP persons to important services.

In order to ensure meaningful access to programs and activities, Sun Metro uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps Sun Metro to determine if it communicates effectively with LEP persons and informs language access planning.

Part I. The Four Factor Analysis is a local assessment that considers:

- 1. The number and proportion of LEP persons served or encountered in the eligible service population
- 2. The frequency that people of Limited English Proficiency come into contact with Sun Metro's programs, activities, and services
- 3. The importance of Sun Metro's programs, activities, and services to persons of Limited English Proficiency
- 4. Resources available to customers and the associated costs

Factor 1 - The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

Utilizing available 2021 American Community Survey (ACS) data, Sun Metro was able to determine that of 867,947 persons within the El Paso County area, 298,059 speak English less

than "well."

Those reporting to have limited English proficiency consist of 17.6% of our service area population. Of the portion of respondents with limited English proficiency, 229,718 or 74.7% of them spoke mainly Spanish, 3,524 or 1.2% spoke an Asian language, 2,698 or 0.9% spoke an Indo-European Language, and another 493 or 0.2% chose "other."

Four Major Language Groups

Spanish includes Spanish, Spanish Creole, and Ladino.

Indo-European languages include most languages of Europe and the Indic languages of India. These include the Germanic languages, such as German, Yiddish, and Dutch; the Scandinavian languages, such as Swedish and Norwegian; the Romance languages, such as French, Italian, and Portuguese; the Slavic languages, such as Russian, Polish, and Serbo-Croatian; the Indic languages, such as Hindi, Gujarati, Punjabi, and Urdu; Celtic languages; Greek; Baltic languages; and Iranian languages.

Asian and Pacific Island languages include Chinese; Korean; Japanese; Vietnamese; Hmong; Khmer; Lao; Thai; Tagalog or Pilipino; the Dravidian languages of India, such as Telugu, Tamil, and Malayalam; and other languages of Asia and the Pacific, including the Philippine, Polynesian, and Micronesian languages.

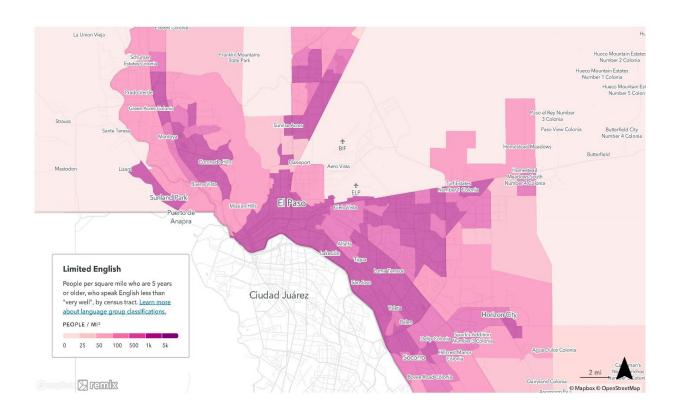
All Other languages include Uralic languages, such as Hungarian; the Semitic languages, such as Arabic and Hebrew; languages of Africa; native North American languages, including the American Indian and Alaska native languages; and indigenous languages of Central and South America (U.S. Census Bureau, 2019).

Speak English Less Than "Well"	El Paso County, Texas Estimate
Spanish or Spanish Creole	226,820
German	911
Korean	732
Chinese	694
Arabic	427
Tagalog	310
French (incl. Patois, Cajun)	307
Other Indic Languages	274
Japanese	248
Vietnamese	241
Other Asian Languages	216
Other Pacific Island Languages	187
Persian	158
Gujarati	116
Italian	98
Urdu	94
Thai	90
Hindi	75
Mon-Khmer (Cambodian)	62
Portuguese or Portuguese Creole	55
Other Native North American Languages	44
French Creole	32
Russian	32
Greek	21
Hebrew	20
Polish	16
Laotian	14
Other Slavic Languages	11
Other West Germanic Languages	10
Hungarian	7
African Languages	0
Hmong	0
Navajo	0
Other and Unspecified Languages	0
Other Indo-European Languages	0
Scandinavian Languages	0
Serbo-Croatian	0
Yiddish	0
IIC Canana 2009 2012 Amarican Canananita	

U.S. Census 2008-2012 American Community Survey 5-Year Estimate Data

The Locations of the LEP Community

While the need to provide language services to the Spanish-speaking population in the Sun Metro service area is demonstrated in the data above, it is helpful to understand where in the service area populations of limited English proficiency reside. The map below provides a spatial display of residents who speak Spanish at home and report speaking English "less than well."



Factor 2 - The Frequency That People of Limited English Proficiency Come Into Contact with Sun Metro's Programs, Activities, and Services

Sun Metro has high levels of service in the LEP clusters and does provide bilingual services. A high percentage of the Sun Metro personnel can communicate effectively in both English and Spanish, thus capable of providing the necessary translations or interpretations.

Factor 3 - The Importance of Sun Metro's Programs, Activities, and Services to Persons of Limited English Proficiency

Sun Metro offers two primary transportation services: fixed route and paratransit services. All areas with a concentration of persons with LEP are well served by both fixed route and paratransit.

LIFT is the name of Sun Metro's paratransit service, which is a demand response service provided for persons with disabilities or other limitations. Sun Metro's fixed routes are an essential mode of transportation for individuals in the surrounding area. Sun Metro's fixed route and paratransit personnel consists of a high percentage of bilingual speakers who can assist in ensuring unimpeded meaningful access by LEP individuals as well as utilizing an abundance of common symbols and maps.

Factor 4 - Resources Available to Customers and the Associated Costs

Sun Metro has resources available to customers in-need of interpretation or translation assistance. The Sun Metro Customer Service department is 100% bilingual (English and Spanish) and can assist LEP individuals. The Coach Operators can also provide translation or interpretation assistance in cases where the passengers need to communicate. Sun Metro also provides all of its public information in both English and Spanish. Sun Metro has also added Braille signage to its facilities, bus stops, and bus bays to assist visually impaired citizens.

To provide additional support to Sun Metro's personnel skills, the City of El Paso also provides sign-language interpreters as well as linguistic interpreters at public meeting/hearings.

Conclusion

Based on the above four factors, Sun Metro has decided to continue to rely on its workforce for aid in language interpreting, while providing additional resources to give meaningful access to persons of limited English proficiency.

Part II: Identifying an LEP person and alerting riders of language assistance

How to identify a person with limited English proficiency that needs language assistance.

Sun Metro employees make every reasonable effort to accommodate all customers, regardless of the challenge. In order to ensure persons of limited English proficiency have meaningful access to services; employees should follow these few guidelines:

- 1. Examine requests for language assistance from past meetings or events to anticipate future language service needs;
- 2. At any future outreach meetings, an employee member will be at the door to greet any people entering the meeting and should also be tasked with identifying any persons of limited English proficiency;
- 3. Have the United States Census Bureau's "I Speak" cards at the sign-in table for any community outreach meeting and at the customer service centers to ascertain a possible future need for interpreter services;
- 4. Keep a tabulation of persons requiring language assistance.

Language Assistance Measures

Sun Metro's selection of the following procedures is based on the need for language service and the resources that can be dedicated to this purpose.

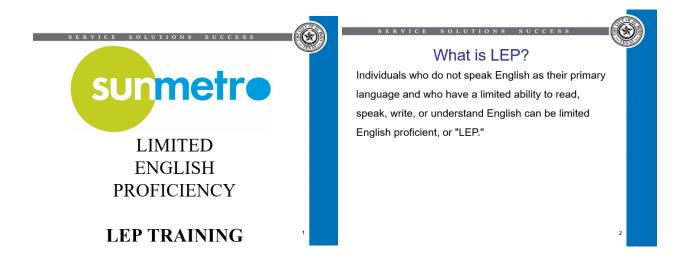
- 1. Attempt to determine what language is required;
- 2. Use the U.S. Census Bureau's "I Speak" card if necessary;
- 3. If the person can speak some English, try to discern their needs without the help of language service;
- 4. For help with translating individual words, visit http://babelfish.yahoo.com/ for a free translator;
- 5. If the employee cannot effectively communicate with the person, attempt to refer them to one of the following language services:

City of El Paso Municipal Clerk's Office 300 N. Campbell El Paso, TX 79901 (915) 212-0049 United States Department of Labor 700 E. San Antonio Avenue Rm. B-400 El Paso, Texas 79901 (915) 534-6426

- 6. If the above does not work, give the person a copy of the above agencies' information so they can call for assistance;
- 7. Should it be necessary and all other options exhausted, employees may use any other creative means of communicating with the person of limited English proficiency.

Employee Training

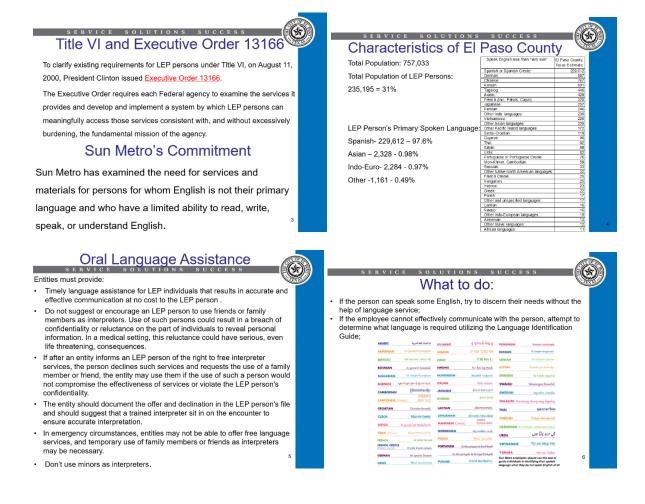
• Employees receive LEP Training. Below is the LEP Training PowerPoint.

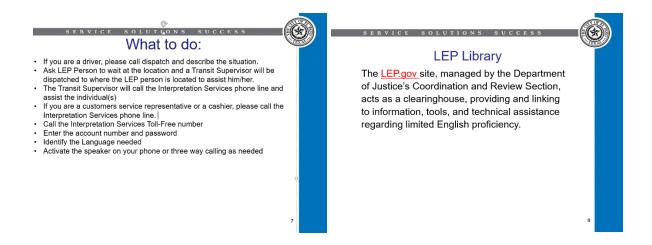


• Customer Service employees and Transit Supervisors are also directed to keep a record of any language assistance requests.

Outreach Techniques

Sun Metro has several avenues for outreach that it currently pursues, as well as future options should the need arise. Key print materials may be translated to accommodate a population of LEP persons should it be found that they are not receiving meaningful access to Sun Metro's services.





Monitoring and Updating the LEP Plan

This plan is a flexible guide and reference tool for employees. It should be updated when necessary, but at the least, it should follow the Title VI Program's updated schedule. It should also be revisited when new U.S. Census data such as when the new ACS Estimates become available, as this will help identify any unmet needs.

Future revisions and updates to this plan will be based on the following:

- LEP populations in the service area or population affected or encountered;
- Frequency of encounters with LEP language groups;
- Nature and importance of activities to LEP persons;
- Availability of resources, including technological advances and sources of additional resources and the costs imposed;
- Whether existing assistance is meeting the needs of LEP persons;
- Whether employees know and understand the LEP plan and how to implement it;
- Whether identified sources for assistance are still available and viable.

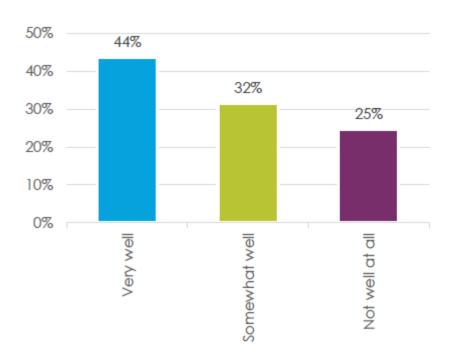
Consulting Directly with the LEP Population

In addition to the census data, an on-board survey was carried out from mid-May to early July 2022. Sampling included 89% of the routes and 63% of the vehicles. On-board surveys were bilingual (English/Spanish) and the sampling included 15% of the ridership to get origins and destinations trip characteristics.

Some of the results of the on-board surveys reflect the following:

Ability to Speak English

More than one-quarter of Sun Metro riders are not proficient in English.



DECISION MAKING BODIES

Recipients that have transit-related, non-elected planning boards, advisory councils, committees, or similar committees, the membership of which is selected by the recipients, must provide a table depicting the racial breakdown of the membership of those committees.

Citizen's Advisory Committee (C.A.C.) for the Board of the Mass Transit Department

The Committee acts as an advisory body to the Mass Transit Board and advises it on any matters over which the Board has authority. It may recommend studies, report results, recommend expansion of the system, and other matters the Committee considers necessary and appropriate.

Body	White (Not Hispanic or Latino)	Hispanic/ Latino	Black or African American	Asian	Native Hawaiian/Other Pacific Islander	American Indian/Alaska Native	Not Specified
Citizens Advisory	4	4					2
Committee – M.T.B.							

City Council Members represent the Mass Transit Board. The monthly Mass Transit Board Meeting coincides with the City Council's first meeting of each calendar month. Sun Metro encourages the participation of minorities on such committees through public announcements on city websites and postings in City Facilities.

SERVICE STANDARDS AND POLICIES

Sun Metro has developed a set of quantifiable service standards and policies.

Fleet

Sun Metro provides service with vehicles of adequate size, design and features based on need and passenger loads due to heavy peak demand. Sun Metro operates a fixed route fleet of 161 buses, with 86 required during weekday peak periods (between 6 a.m. to 9 a.m.). On Saturdays, 68 buses are required during peak periods with 19 peak buses on Sundays. All routes are designated wheelchair accessible and all buses assigned to routes are wheelchair lift-equipped.

The City's ADA complementary paratransit service (LIFT) is operated under contract with MV Transportation. MV operates a fleet of 68 City-owned vehicles during the same hours as fixed-route service throughout the city limits and within 1.5 miles of the contracted service. The City supplements directly operated service with purchased demand taxi service for ambulatory persons with disabilities. The ADA fare is \$2.50 per trip. The LIFT consists of approximately 6,709 participants.

The LIFT provides curb-to-curb (origin to destination) on-demand transportation services for disabled citizens unable to use conventional public transportation. The LIFT has a total fleet of 68 accessible lift-equipped vehicles.

The 68 accessible lift-equipped vehicles are assigned based on transportation need and volume to cover 100% of the trip demand for each day, rotating them for preventative maintenance and mileage coverage purposes.

Vehicle Assignment Policy

Sun Metro's primary service consists of 58 fixed-route bus routes that traverse along city streets and highways. Geographically, Sun Metro coverage is extensive, with a total of 480 directional route miles. The radial system focuses on downtown El Paso and utilizes the Bert Williams Santa Fe Downtown Transfer Center as the major downtown terminal and transfer locations. There are seven major ad hoc transfer points which are located at:

- Downtown Transfer Center,
- Five Points Transfer Center (central El Paso),
- Northeast Transfer Center,
- Eastside Transfer Center,

- Westside Transfer Center,
- Mission Valley Transfer Center,
- and Glory Road Transfer Center which is located by the University of Texas at El Paso (UTEP).

Sun Metro's service coverage is excellent in the highly developed portions of the City. Most of the City is located within a reasonable walking distance from an existing route with the majority being within one-quarter of a mile.

Bus routes are divided into four categories: Locals, Circulators, Expresses and Crosstown routes. Each service category operates as a fixed route service.

Features characterizing each service category are as follows:

Local Service - Routes such as these primarily operate local service between closely spaced stops; have frequent service; serve long to medium length trips within high-density residential land use and are oriented toward the Central Business District.

Expresses - Express service from the Westside, Northeast, Eastside and Lower Valley is provided to downtown El Paso. Sun Metro operates four express routes from five park-and-ride locations to facilitate peak-period commuter service in outlying suburban areas and to serve non-traditional patrons.

Cross-town - Fixed-route service that connects the East, Northeast, and Lower Valley sectors of El Paso focused on major activity centers; provides essential system connections within these areas.

Circulator Routes- These routes provide convenient neighborhood service to include routes radiating from the Northgate, Eastside, Westside, Five Points, and the International Bridges. These areas connect service to hubs where customers can transfer to connecting routes.

Vehicle Load

Currently, the Sun Metro passenger load standard allows an average load factor of 150 percent for peak-period local service. It is reduced to 100 percent for base period service. A load factor of 100 percent is the standard for express service. A 150 percent passenger load factor for peak period service is generally high.

Passenger counts indicate an average load factor of 1.50 passengers per trip during each peak service level. The frequency of service on a route is set so that the load standards are not exceeded on consecutive buses; however, they may be exceeded for non-consecutive buses. Load factors at or below the standards do not prevent the addition of service where loading requires passengers to stand for more than 15 minutes of their travel time. The data is collected and reviewed to evaluate this criterion are traffic checks of passenger loads, public comments, operator reports and supervisor checks.

Vehicle Headway (Frequency)

Vehicle headway standards that have been developed specify maximum service frequencies that are generally based on the type of service, the time period, the day of the week, and the passenger demand. Specifications allow maximum headways of 73.1 minutes for peak-period and 90.4 minutes for the base period. Sun Metro's current vehicle headways are consistent with industry standards. Passenger counts, load checks, operator reports, public comments, supervisor reports, and Automated Vehicle Locator (AVL) reports are all used in evaluating vehicle headways.

On-time Performance (Schedule Adherence)

A bus is determined to be late if it departs its scheduled "time point" five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure. It is Sun Metro's goal to be on-time at least 85% of the time. Sun Metro has been averaging 89% on-time performance within the last three years. On-time performance is tracked and included in monthly performance reports to the Sun Metro Board of Directors.

Bus Operations staff also regularly monitors on-time performance and advises operators who consistently fail to meet on-time performance standards that are within their control. Discussions with bus operators are also used to identify vehicle scheduling issues which are corrected through service changes three times annually.

Service Availability – Access to the Bus

Standards for route spacing are generally based on an area's residential or employment density, distance from an activity center, and the type of transit service already in operation or planned for the area. These spacing requirements frequently stipulate that a specific percentage of an area's residents should be within ½ mile or ½ mile of a transit route.

Sun Metro has established a goal that service should be provided for areas with a density of 2,000 to 3,000 persons per square mile. The Sun Metro goal is that service should be provided within one-half mile of 50 percent of the population. This established standard is appropriate to the Sun Metro level of service.

The data required for the evaluation of route spacing consists of population and employment data, maps displaying trip generators, residential areas, the transit network, and public comments.

Transit Amenities Policy

For placement of accessory transit amenities/facilities, decisions are made through several channels depending on the type and nature of the facility with primary input coming from passenger use, public input, coach operator/supervisory staff, the Mass Transit Department

Board, community-oriented organizations, and the City of El Paso Department of Traffic and Transportation for safety consideration where necessary.

Passenger Shelters

As of October 2022, there are 668 bus shelters installed to protect riders from the intense sun typical to El Paso, which usually reaches 3-digit temperatures beginning in the spring and throughout the summer. In addition, the bus shelters protect riders from the extreme gusts that could reach up to 70 mph.

Bus Shelter Designated Point System

The point system identifies pertinent factors that are weighed according to the relative importance Sun Metro attaches to each category. These factors and corresponding points are listed below.

Passenger Stops

As of October 2022, there are 2,417 regular bus stop signs installed. Bus stops are customarily placed every 700 feet in residential areas (7 per mile) or every 400 feet in major activity areas, such as the Central Business District or strip commercial development (12 per mile). They are delineated by a sign on a pole, with the sign designed to provide identification as an official Sun Metro bus stop in both inbound and outbound directions.

Sun Metro installed real-time placards. Riders can receive real-time schedules and route data via QR code or text by utilizing signs at bus stop poles and shelters.

Here is the link for more information: https://sunmetro.net/how-to/use-real-time-placards/



Stop ID

The first number on the sign is the Bus Stop ID Number. Each stop has a unique ID which can be used to gather real-time information about that particular bus stop. In this example, the Bus Stop ID Number is 1064.

QR Code

The image of the square in the center of the sign is called a QR code. If you have a smartphone (such as an iPhone®, Galaxy®, etc.) and have installed a QR code reader app (available for free in your phone's app store), simply open the app and scan the QR code to instantly view bus information at a particular stop.

Text Messages

If you prefer getting the information via text message, you can send a message to 25370. The message should contain only the following information: smbus stopID#

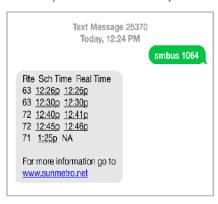
Replace the "stopID#" with the number at the top of the sign. In our example, the Bus Stop ID Number is 1064, therefore our text message would look like this:

smbus 1064

Capitalization isn't important, but make sure that "smbus" is all one word. Also, a space between "smbus" and the Bus Stop ID Number is necessary.

Braille System

Here is an example of the text message you can expect to receive on your phone after sending the text to **25370**:



Park & Ride Facilities

Sun Metro operates 4 express routes from 8 Park & Ride locations to provide accessible transfer points, facilitate peak-period commuter service in outlying suburban areas, and to serve non-traditional patrons. Amenities at these locations include shelters, benches, nighttime lighting, and paved parking areas.

There are two Park and Ride lots for Eastside Express passengers with bus stop signs to designate the boarding area at the following parking lots:

- 1. Arturo Tury Benavides Cielo Vista Transit Center: 1165 Sunmount
- 2. Vista Hills Park & Ride: Vista Hills Shopping Center (rear parking lot); 1840 N Lee Trevino

El Paso Streetcar

On November 12, 2018, the El Paso Streetcar began service. The El Paso Streetcar route highlights all the wonderful things that make El Paso downtown and uptown a unique place to visit. The 4.8 mile-route runs in two loops through El Paso's uptown and downtown areas. Both loops interconnect through a single-tracked corridor on an international bridge, an array of businesses, restaurants, government buildings, a convention center, a downtown ballpark, and the University of Texas at El Paso, among many other prominent locations. As part of this project, six vintage streetcars (the same vehicles that ran on El Paso streets until 1974) were restored for the rigors of daily service. While the cars are decades old, they are outfitted with modern amenities including:

- Seating for 35 people and additional space for standing riders
- Free Wi-Fi
- ADA accessibility
- Bike racks
- Air conditioning
- Heating
- Upgrades for safety
- Modern propulsion
- Streetcar branding along the route and signage at designated stops
- Pavement, sidewalk, and driveway improvements at designated stops.





RTS Corridors

The highest transportation priority for the City and Sun Metro is the implementation of a four-line, citywide RTS/TOD corridor system that connects with other regional and local bus services as well as rail, air, and ground transportation. Corridors include:

- International/Downtown/Central El Paso serviced by the other three corridors, services the International border area to Glory Road and the University of Texas at El Paso campus.
- Mesa Corridor services Westside Transit Center to Downtown Transit Center and ends at Glory Road.
- Alameda/North Loop/Mission Valley Corridor services Alameda Street and far-Southeast El Paso, connecting to an El Paso County operated Rural Transit line that provides limited fixed route service to the East of Montana and the Mission Valley area incorporated cities.
- Montana Corridor services East and Far East El Paso to George Dieter.
- Dyer Corridor services Northeast El Paso.

Brio is Spanish for excitement, verve and energy and is the term used to describe and brand El Paso's RTS system. In addition to Transit Terminals, each RTS Corridor has several Brio stations that are well-lit and rider-friendly. Amenities include:

- Wi-Fi hotspots;
- Automated Brio status information boards;
- Translucent panels for better lighting;
- Bike racks;
- Shade screens;
- Electronic real-time displays;
- Ticket Vending Machine (T.V.M.) and
- Solar-powered compacting trash can(s).

The stations comply with all City, State and Federal regulations. Where feasible, public art displays selected or designed by the City's Museums and Cultural Affairs Department Public Art Division are included either as standalone pieces or as components of improvements throughout each corridor.





Sun Metro Brio began in the Fall of 2014, with the introduction of the Mesa corridor. Alameda and Dyer RTS corridors became operational on September 23, 2019. Lastly, the Montana corridor will become operational in late Fall of 2022.

Brio Rapid Transit System Map



The 60-foot articulated Brio buses run on CNG fuel with a 400-route mile capacity and seven-minute fill-up time. They are well equipped to keep the modern-day rider comfortable and informed of their destination while staying in touch with work, family, friends or just enjoying the ride. The amenities include announcement monitor, Wi-Fi, and bike racks.



PROGRAM SPECIFIC REQUIREMENTS

Construction Equity Analysis

Sun Metro prepares Advanced Planning Reports prior to the construction of its transit terminals. The Advanced Planning Report includes the following:

Transit Terminal Demand Analysis: Sun Metro investigates the feasibility of Park and Ride locations throughout the City to develop a series of service improvements that aid in maximizing system performance, making the system more attractive to users and leading to various operating efficiencies through the development of a network of transit transfer centers. The results of this demand analysis allows Sun Metro to implement a network of Park and Rides at various locations throughout the City to address rapid population growth and stimulate economic expansion.

Transit Terminal Site Selection Analysis: The Site Selection Analysis process included research and collection of demographic, site and other data; development of site requirements; development of evaluation criteria; evaluation of each site against criteria; and site recommendation.

Environmental Assessment: The Environmental Assessment is used to determine the project's environmental consequences (positive or negative) prior to the implementation decision. It proposes measures to adjust impacts to acceptable levels or to investigate solutions to mitigate any negative impacts.

In the future, when Sun Metro plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, transit hub or operation center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility.

The following principles will be applied in the analysis:

- 1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- 2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- 3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

TITLE VI EQUITY ANALYSIS POLICIES AND PROCEDURES

Purpose

The Federal Transportation Administration requires Sun Metro to adopt Title VI Equity Analysis Policies. These include a Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy. The purpose of service and fare equity analyses prior to implementing service and/or fare changes is to determine whether the planned changes will have a disparate impact on the basis of race, color, national origin or income.

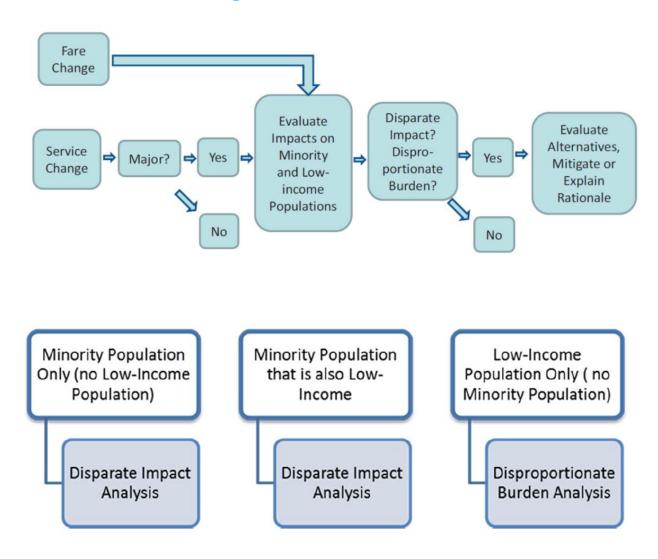
References

Title VI of the Civil Right Act of 1964, Section 601 states: "No person in the United States shall, on the grounds of race, color or national origin be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The FTA requires applicants, recipients, and subrecipients of Federal assistance to certify compliance with the requirements of Title VI as part of the grant approval process. As part of that requirement, FTA Circular 4702.1B requires transit agencies that serve urbanized areas of

200,000 people or greater to evaluate significant system-wide service and fare changes at the planning and programming stages to determine whether proposed changes would have a discriminatory impact. For service changes, this requirement applies to "major service changes" only, and the recipient establishes guidelines or thresholds for what it considers a "major service change."

Service and Fare Change Process



Definitions

Discrimination refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal-aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate Burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Disparate Treatment refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of race, color, or national origin.

Low-income Person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: "refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved" or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than well, not well, or not at all.

Low-income Population refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Minority refers to a person or passenger who identifies as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino (of any race), Native Hawaiian or Other Pacific Islander, or identifies as more than one race (multiracial) or some other race.

Predominantly Minority Area means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

SUN METRO TITLE VI EQUITY ANALYSIS POLICIES

The major service change, disparate impact, and disproportionate burden policies were drafted collaboratively by Sun Metro staff. A variety of informational items and data were used in the determination of these draft policies:

- Policies in place at peer transit agencies across the United States.
- Data availability and ease of application to determine when a major service change is proposed.
- Census data analysis on the demographic and socio-economic composition of the population in the service area.
- Ridership survey data collected in 2022.

Major Service Change Policy

All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the Sun Metro Transit Board of Directors for its consideration and included in the Sun Metro Title VI Program with a record of action taken by the Board.

Sun Metro has defined a major service change as a reduction or increase of 30 percent or more in total vehicle revenue miles or total revenue hours in service in any service area during a service review period.

The following service changes are exempted:

- Changes to a service on a route with fewer than 20 total trips per unit are not considered "major" unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than twelve months.
- Sun Metro-operated transit service that is replaced by a different mode or operator providing a service with the same or better headways, transfer options, the span of service, and stops.
- Deactivation of a route if it does not reach above 10 passengers per hour or 1.0 passenger per mile after 6 months' period of implementation.

Disparate Impact Policy

This policy establishes a threshold for determining whether a given action has a disparate impact on minority populations. In the course of performing a Title VI Equity Analysis, Sun Metro must analyze how the proposed action would impact minority populations as compared to nonminority populations.

In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, Sun Metro must evaluate whether there is an alternative that has a more equitable impact.

Otherwise, Sun Metro must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

The Disparate Impact Threshold is utilized to determine if the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established over 25 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference between the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

Disproportionate Burden Policy

This policy establishes a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate Burden Policy applies only to low-income populations that are not also minority populations.

The Sun Metro Disproportionate Burden Threshold is utilized to determine if the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established over 25 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

SUN METRO SERVICE AND FARE MODIFICATIONS

Sun Metro will present all service/fare modifications to the Citizen's Advisory Committee and the Mass Transit Board. All presentations will be notated for future reference.

The following service fare modifications occurred during the 2020-2022 time period and were exempt from conducting a major analysis:

- September 22, 2019
- March 29, 2020 (See Attachment 1)
- August 2, 2020
- December 6, 2020
- June 20, 2021
- November 21, 2021
- February 20, 2022 (See Attachment 2)
- June 26, 2022

The following fare changes occurred during the 2020-2022 time period:

- December 2021 (See Attachment 3)
- October 2022 (See Attachment 4)

MONITORING SYSTEM-WIDE PROGRAM SERVICE STANDARDS

Pursuant to requirements set forth in the FTA Circular 4702.1B, Sun Metro must establish and monitor its performance using quantitative Service Standards and qualitative Service Policies.

Subrecipient Compliance and Monitoring

Subrecipient transportation providers will adhere to Sun Metro's standard as it relates to all transportation requests to ensure minority, low-income, and LEP's are included in decision-making processes and that no one is excluded from service participation and discriminated against based on the ground of race, color or national origin. All customer complaints related to subrecipient transportation flow through Sun Metro's complaint logging and investigating procedures to ensure proper tracking, handling and prompt resolution of the complaints.

Demographic Service Profile

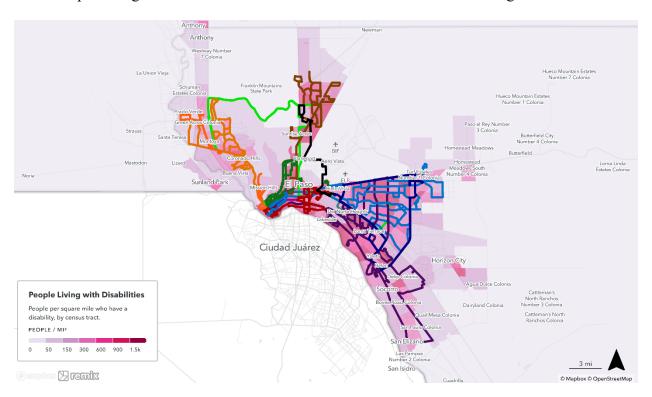
Transit Needs Index Factors

In reviewing 2021 ACS (American Community Survey) data for the El Paso Region on the disabled, elderly, household without an automobile, household below poverty level and median income populations; The Transit Needs Index (TNI) serves as the basis to establish indicators of needs for transit and provides an analysis of the demographic groups in need for public transportation reliance. The lowest index score is 5 and the highest is 15.

Transit Needs Index Factor 1 – Disabled Population

Approximately 9% of the El Paso population is classified as having a disability (calculated from the U.S. Census 2021).

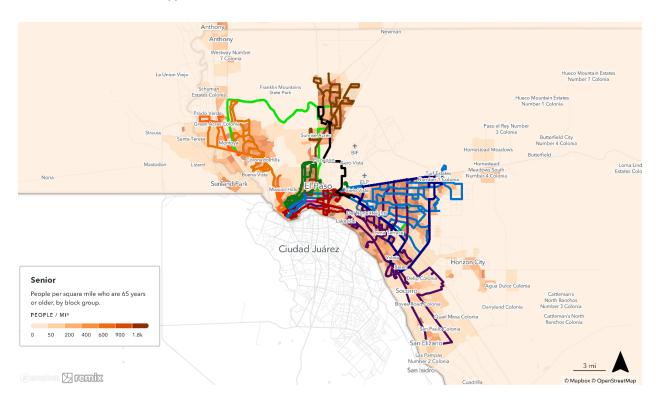
- A census tract in which the percentage of disabled is less than 24% is considered as having less demand for public transit.
- A percentage of disabled between 24% and 40% is considered the median need.
- A percentage of disabled of more than 40% is considered to have a high need for transit.



Transit Needs Index Factor 2 – Elderly Population

A total of 12.8% of the El Paso population is older than 65 (U.S. Census 2021).

- Census tracts in which the percentage of households age 65 and over is less than 8% of all households are considered to have a low need for transit.
- A percentage of persons age 65 and over between 8% and 14% is considered medium need.
- A high need for transit based on age is found in census tracts with more than 14% of all households are 65 and older.

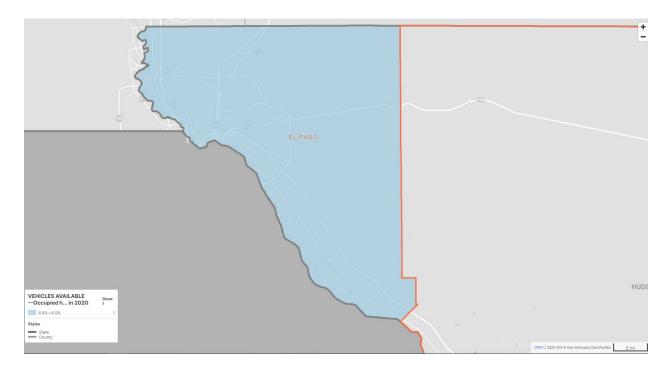


Transit Needs Index Factor 3 – Percentage of Households without an Automobile

Households lacking an automobile in the City of El Paso are significantly challenged with respect to mobility options. In El Paso, 6.9% of households do not have at least one vehicle.

Considering the average family size of 4 individuals per household, the ownership of only one automobile per household significantly challenges their transportation choices.

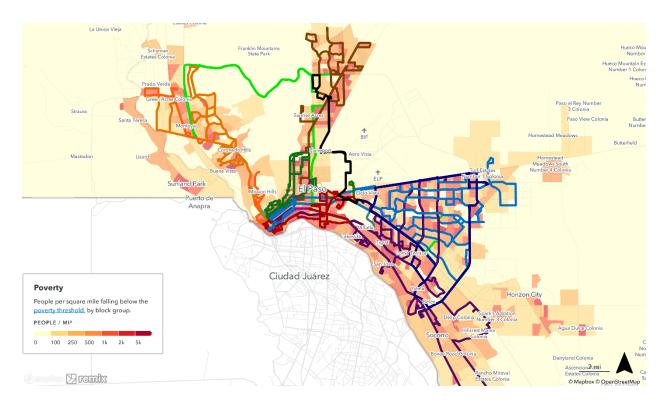
- Census tracts with fewer than 10% of households without at least one vehicle are considered to have a low need for transit.
- Tracts averaging between 10% and 30% of all households without automobiles are considered to have a medium transit need.
- Tracts with more than 30% of households without automobiles are considered to have a high transit need.



Transit Needs Index Factor 4 – Percentage of Household below Poverty Level

Communities with a higher percentage of households below the poverty level are less likely to have access to reliable private transportation and therefore need alternate transportation.

- Communities with over 43% of households below poverty level are considered to have a high need for transit.
- Communities with 20% to 43% of households below the poverty level are deemed as having a medium need for transit.
- Tracts with less than 20% of households below the poverty level are considered to have a low need for transit.



Transit Needs Index Factor 5 - Median Household Income

Households with income levels significantly lower than the median household income for the City of El Paso is considered to have a greater need for transit service. Communities with household incomes well above the median income are viewed as having a lower critical need for basic transit.

- In El Paso, census tracts with household incomes below \$25,165 are considered to have a high need for transit services.
- Census tracts with incomes that range from \$25,165 but no more than \$51,044 per household are considered the medium need for transit.
- Households with income above \$51,044 are considered low-need.



2022 SUN METRO TRANSIT BOARDING/ALIGHTING AND ON-BOARD SURVEY

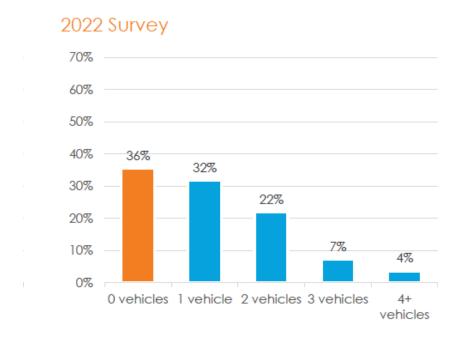
Purpose of the Survey

The primary purpose of this study was to provide Sun Metro, the Mass Transit Board, the El Paso Metropolitan Planning Organization, and the Texas Department of Transportation — El Paso District with information that will be used to help plan future improvements to the bus system in the City of El Paso. For example, the results of this study may be used to help decide what new routes to develop and to help plan changes to existing routes. These improvements could make bus service accessible to more people in more parts of the metropolitan area.

Major Findings

A total of 2,704 responses were collected during the survey.

According to the survey, 36% of Sun Metro users reported that they did not have any vehicles available in the household indicating that they are primarily dependent on the bus system.



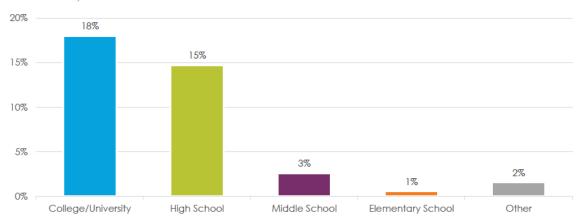
Of the Sun Metro riders participating in the on-board survey, 40% were students and 60% were non-students.

Student Status

One out of three riders are college or high school students.

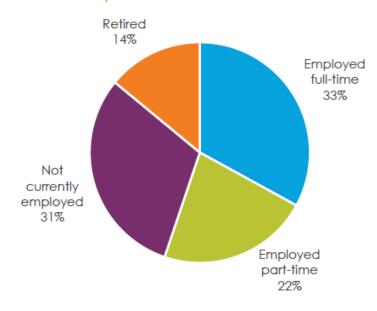
The May 2022 survey asked respondents about their student status. About 40% of respondents identified as a student with the majority attending College/University (18%) followed by High School (15%).





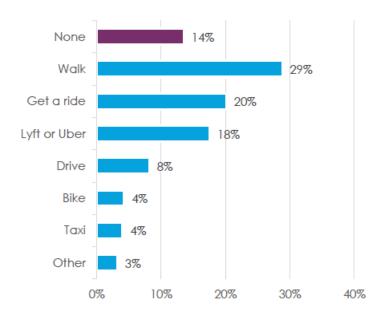
Of the 60% of Sun Metro users who were not students or refused to answer the question, 31% reported being unemployed.

2022 Survey



Less than 20% of riders reported that they would not have made the trip without Sun Metro. About 29% of riders would walk to their destination(s) if Sun Metro were not available.

2022 Survey



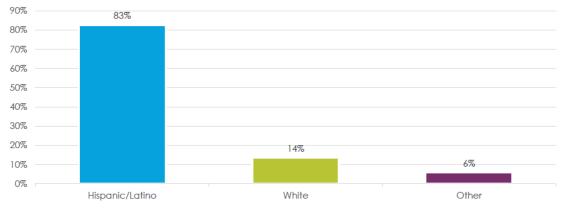
The majority of Sun Metro transit users by ethnicity were 83% Hispanic, 14% White/Caucasian, and 6% from other categories.

Ethnicity

Sun Metro riders are predominately Hispanic/Latino.

The June 2022 survey asked riders about their racial or ethnic identity. In both years, the large majority of riders identify as Hispanic/Latino. In May 2022, a higher percentage of riders identify as White or Other.

2022 Survey



Note: Respondents could select multiple racial or ethnic identities, so percent does not add up to 100%.

GRANTS, REVIEWS, AND CERTIFICATIONS

Pending FTA Grants

- 1539-2021-4: FY21 5307 El Paso Planning and Capital Items
- 1539-2023-1: FY21 Sun Metro Rising American Rescue Plan Act
- 1539-2022-4: COVID-19 ER Response El Paso Sun Metro FY17 5307
- 1539-2022-7: El Paso Sun Metro 5339C Paratransit Fleet Replacement-Zero Emission Vehicles FY22
- 1539-2022-5: El Paso Sun Metro FY22 5339 Capital Funding
- 1539-2022-6: El Paso Sun Metro FY22 5307 Planning and Capital Items

Pending Application for Financial Assistance

Sun Metro has no pending applications for financial assistance from any federal agency other than the FTA.

Open FTA Grants

- TX-2022-010-00: El Paso Sun Metro FY20 Competitive HOPE (5305) Program Feasibility Study and Alternatives Analysis for Regional Fare Structure and Payment System
- TX-2017-033-00: FY15 & FY16 5339 Bus & Facility Funding
- TX-2022-020-00: Ride Sun Metro Contactless Payment Project
- TX-2020-032-01: El Paso Sun Metro CIG Funding Montana BRT/RTS Corridor
- TX-2018-072-02: FY2018 5307 Formula Grant Funding
- TX-2018-036-00: FY17 5339 Bus & Facilities Apportionment 1539
- TX-2017-048-01: FY15-FY16 5307 Formula Funding Grant
- TX-2017-036-01: Sun Metro Engine Rebuilds FY2016 STP/MM
- TX-2022-071-00: El Paso Sun Metro FY21 5339 Capital Funding
- TX-2022-054-00: ARP Act Funding (5309) for El Paso, Montana RTS
- TX-2020-099-00: El Paso Sun Metro FY19 & FY20 5339 Vehicle Purchases
- TX-03-0307-00: El Paso Dyer Corridor RTS
- TX-39-0009-00: El Paso Dyer Corridor RTS
- TX-03-0308-00: El Paso Dyer Corridor RTS
- TX-2022-022-00: ARP Section 5307 FY21 El Paso Sun Metro Operating Assistance
- TX-04-0099-00: Mesa Corridor BRT/RTS project
- TX-2020-011-00: El Paso Sun Metro FY18 CMAQ
- TX-2019-050-00: El Paso Sun Metro FY2016 CMAQ Transfer Bus
- TX-2018-012-00: Bus Replacement (2 Buses) FY17 FTA Transfer
- TX-2019-038-03: Dyer RTS (BRT) Operating Assistance FY18 CMAQ

- TX-2019-040-02: Alameda RTS Operating Assistance FY19 CMAQ
- TX-2018-013-00 I-10: West El Paso Traffic Mitigation Operating Assistance YEAR 2 FY2017 CMAQ
- TX-2020-052-00: Sun Metro El Paso (1539) FY 20 5307 Planning and Capital Items
- TX-2020-028-00: El Paso Sun Metro FY 19 5307
- TX-2020-024-00: El Paso Sun Metro FY18 5339
- TX-2017-064-00: FY17 5307 Formula Funding Apportionment

Civil Rights Compliance Reviews in the Past 3 Years

Triennial Review

Recent Annual Certifications and Assurances

Completed on March 24, 2022

Previous Triennial Review Findings

Area	Code #	Rationale	Corrective Action	Due Date
Title VI	TVI2-1	Language Assistance	The City must prepare and submit	January
		Plan deficiencies.	documentation of implementing its	13, 2020
			LAP, including translation of vital	
			documents into Spanish and	
			documentation of training provided	
			to the City and paratransit operating	
			contractor's staff on the City's Title	
			VI program.	
	TVI8-1	Impact of fare and/or	The City must submit an equity	January
		service changes were	analysis for any major service	13, 2020
		not adequately	change that occurred since the	
		examined.	submission of the last Title VI	
			Program and must submit revised	
			and implemented procedures to	
			ensure that future equity analyses	
			will be conducted as required.	

CONTACT

For additional information on Sun Metro's Title VI Plan or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, please contact:

Ellen Smyth, Chief Transit and Fields Operations Officer Sun Metro 10151 Montana Ave El Paso, Texas 79925 (915) 212-3333 SmythEA@elpasotexas.gov

APPENDIX

Attachment 1: March 29, 2020 Service Equity Analysis

(See Below)

MASS TRANSIT DEPARTMENT BOARD MINUTES CITY COUNCIL CHAMBERS April 14, 2020

Due to the temporary suspension of Open Meetings laws due to the COVID-19 emergency this meeting was conducted via telephonic and videoconference.

A meeting of the Mass Transit Department Board was called to order at approximately 10:17 a.m. with Dee Margo, Chairman, presiding. The other members present were: Peter Svarzbein, Alexandra Annello,
Cassandra Hernandez, Sam Morgan, Isabel Salcido, Claudia Rodriguez, Henry Rivera and Cissy Lizarraga. Absent: None.
CONSENT AGENDA Motion made by Board Member Rivera, seconded by Board Member Morgan, and unanimously carried to APPROVE all matters listed under the Consent Agenda unless otherwise noted. (Items approved, postponed,
or deleted pursuant to the vote on the Consent Agenda will be shown with an asterisk {*}.
AYES: Board Members Svarzbein, Annello, Hernandez, Morgan, Salcido, Rodriguez, Rivera, Lizarraga and Board Chair Margo NAYS: None
1. APPROVAL OF MINUTES
*Motion made, seconded, and unanimously carried to APPROVE the Minutes for the Mass Transit Board
Meeting held on March 3, 2020.
2. REQUEST TO EXCUSE ABSENT MASS TRANSIT DEPARTMENT BOARD MEMBERS
NO ACTION was taken on the item.
3.
RESOLUTION
NOW THEREFORE, BE IT RESOLVED BY THE MASS TRANSIT DEPARTMENT BOARD OF THE CITY OF EL PASO:
The Agency Safety Plan attached to this resolution as Attachment "A" is approved and adopted. Further, that the City Manager, or designee, be authorized to submit the Agency Safety Plan to the Federal Transit Administration, the Texas Department of Transportation, and/or the State Safety Oversight Agency. Further, that the City Manager, or designee, be authorized to execute any documents and perform any actions necessary to effectuate the Agency Safety Plan. Further, to the extent allowed by law that the City Manager is authorized to make any changes to the Agency Safety Plan.
*Motion made, seconded, and unanimously carried to APPROVE the Resolution.
4. PURCHASING REQUEST

The linkage to the Strategic Plan is subsection 7.3 – Enhance regional comprehensive transportation system. This contract will allow Armored Car Services consisting of monies picked up and delivered to the bank for deposit; as

well as, delivery to Bus Terminals, Bus Stops and the Administration Building.

Award Summary:

Motion made by Board Member Lizarraga, seconded by Board Member Rivera, and unanimously carried to AWARD Solicitation No. 2020-492 Armored Car Services to Trans America Protection Corp. for an initial term estimated award of \$142,812.00. The award is to include a two (2) year optional amount of \$95,208.00 for a total five (5) year award of \$238,020.00.

Contract Variance:

Department:

The difference in cost, based on the comparison from previous contract is as follows: A decrease of \$39,994.56 for the initial term, which represents a 21.9% decrease in the total 3-year estimated amount due to decreases in locations and frequency of the service.

Mass Transit (Sun Metro)

Award to: Item(s): Initial Term: Option to Extend: Annual Estimated Award: Initial Term Estimated Award: Total Estimated Award:	Trans America Protection El Paso, TX All 3 years 2 years \$47,604.00 \$142,812.00 (3 years) \$238,020.00 (5 years)
Account No.:	560-3200-60000-522150-P6003
Funding Source: District(s):	Sun Metro Operating Funds All
This is a Best Value, service type contract	ct.
	and Mass Transit (Sun Metro) Departments recommend award as orp., the bidder offering the best value bid.
-	lanager or designee is authorized to exercise future options if needed.
5.	
Presentation and discussion on Sun Met Pasoans.	ro's response to the Coronavirus in providing transit services for El
Mr. Jay Banasiak, Mass Transit Director p	resented a PowerPoint presentation.
Board Members Svarzbein and Lizarraga	commented.
NO ACTION was taken on the item.	
Motion made by Board Member Svarzbe adjourn this meeting at 10:38 a.m.	in, seconded by Board Member Lizarraga, and unanimously carried to
Approved as to content:	
Jay Banasiak, Director	

In Response to Coronavirus (COVID-19)

April 9, 2020

Sun Metro is taking the necessary precautionary measures to ensure the safety of passengers and employees alike. We are in constant communication with our City Leadership team along with national and local partners, to include transit associations, to stay informed of the latest Coronavirus (COVID-19) updates.

In light of current circumstances, please rest assured that we are looking out for your best interest making your health and safety our highest priority. As part of our focused efforts to maintain our services at the highest level we are taking the following steps:

Increasing Cleaning Services:

- Buses, Brio and LIFT
 - Our fleet undergoes a scheduled cleaning process nightly upon returning from service. This includes cleaning out debris, sweeping and mopping of floors with industrial disinfecting products, wiping down the operators area and washing the exterior. We have increased our cleaning efforts as follows:
 - Additional cleaning crews are cleaning buses in high-touch areas (stanchions, hand rails, seat rails and fare boxes) when they arrive at the Downtown Transit Center. Passengers will be asked to deboard the bus momentarily so cleaning crews can do their work.
 - Additional cleaning crews have been set-up at our main transit hub where detail cleaning of buses takes place throughout the day and upon their return.
 - Sanitation aerosol treatments are being applied daily to disinfect all interior surfaces.
 - A detailed cleaning process will take place twice per month, through a thirdparty contractor, to ensure all areas of buses are sanitized. This includes, but is not limited to the cleaning of internal sections such as ceilings, windows, grab rails and fare boxes.
- Facilities
 - We are maintaining the highest standards of cleanliness at all of our facilities to ensure our passengers and employees are safe. Our facilities are cleaned daily with industrial disinfect solutions. This includes sections such as, high traffic surfaces, counters and door handles. We will be increasing our cleaning services as follows:
 - Doubling cleaning efforts after service ends

Preventative Measures:

In order to encourage social distancing we implemented a few changes for the safety of our passengers and employees.

- All Sun Metro services have been free since **Sunday**, **March 22**, **2020**, until further notice, with the implementation of the following guidelines:
 - All passengers' board and exit through the rear doors. The front section of the bus has been cordoned off to reduce the contact between the operator and passenger.
 - Boarding exceptions are made for riders who have accessibility needs and require the use of the drop-down ramps located at the front doors.
 - 'Seat Closed' signs have been placed on every other seat allowing passengers to keep a safe distance between themselves and others.

 Coach Operators are enforcing the 'No Standing Loads' rule to eliminate full busloads. In the case where we cannot accommodate every passenger with the two empty seat rule, we have buses on stand-by for transporting excess loads.

Service Modifications:

On, **Wednesday**, **March 25**, **2020**, Sun Metro implemented service changes that will remain in effect until further notice:

- Fixed route service is operating on a Sunday schedule Monday through Saturday with the addition of the following:
 - o Routes 19, 43, 71, 73 are running on a Saturday schedule, Monday through Saturday.
 - Brio service (Mesa, Dyer, Alameda) runs on a Saturday schedule, Monday through Saturday.
 - o Routes 3 and 42 have kept peak service hours, Monday through Friday.
 - o Sunday service along with routes 83 and 84 remain unchanged.
 - o Fixed route service on Sundays now operate on a Sunday schedule with no additions.
- Streetcar service is suspended until further notice.

Passenger and Employee Safety:

We are continually monitoring, assessing and responding to the COVID-19 situation and distributing educational materials to our passengers and staff. As such, we have placed CDC approved posters at all our facilities that encourage passengers and employees to practice proper hygiene and avoid close contact with others. It is everyone's responsibility to practice the following preventative measures:

- Stay home if you are feeling sick
- Wash your hands with soap and water for at least 20 seconds
- Avoid touching your eyes, nose and mouth
- Cover your cough or sneeze into your elbow

Sun Metro offers several additional services that are consistently available to you:

- Sun Metro App: Helps you plan your trip, see routes schedules and next departures
- Trip Planner: Helps you plan your trip from the comfort of your home before going to the bus stop
- QR Code Placards: Scan the QR Code found at all bus stops, to get bus time arrivals in real-time
- Customer Service Line: Open Mon Fri: 6am 8pm / Sat: 8am 5pm / Sun: 8am 3p



Jay Banasiak Director







Mission

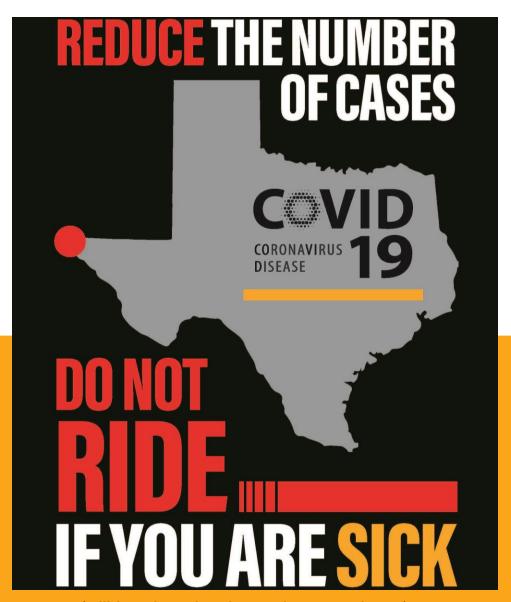
The mission of Sun Metro is to provide a first-class public transportation service to all El Pasoans and visitors so they can experience safe, reliable, professional, courteous customer service and economic opportunity.











(will be placed on buses by entry doors)

Sun Metro COVID-19 Response

- Sun Metro continues to providing essential public transit services to El Paso, while taking the necessary precautions to ensure the safety of passengers and employees alike
- Continuous coordination of efforts with key partners:
 - COEP senior leadership
 - Emergency Operations Center
 - Federal Transit Association
 - Texas Department of Transportation
 - American Public Transportation Association
 - Texas Transit Association
 - South West Transit Association



COVID-19 Services Implementations

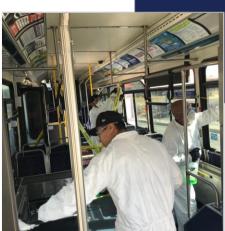
• Daily Efforts:

- Increasing Cleaning Services
- Social Distancing
- Service Modifications
- Passenger and Employee Safety











Increased Cleaning Efforts

- Fixed Route, Brio and LIFT
 - Daily standard cleaning of all buses at night:
 - Cleaning out debris, sweeping and mopping floors, cleaning of drivers' area and washing of exterior of bus
 - Additional Cleaning Efforts
 - Daily cleaning of high-touch areas inside buses arriving at Downtown and Eastside Transit Centers
 - Daily sanitation aerosol treatment applied to several buses at the TOC and Depot
 - Doubling detailed cleaning and sanitizing of buses through a third party contractor daily; 286 buses detailed monthly



Your City in 5 – April 2, 2020

• (Separate email, too large to add to this presentation and email)



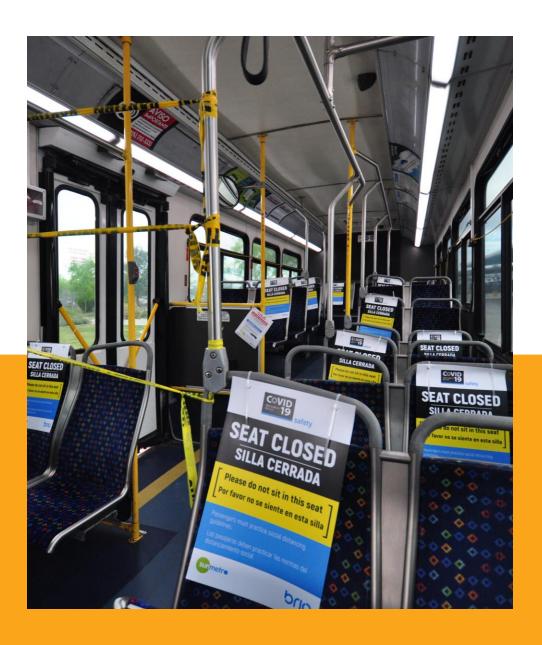




Daily Cleaning of Transit Center Facilities

- Daily cleaning and sanitizing of all transit centers through a third party contractor during operating hours
 - Cleaning high traffic areas, floors, counters, restrooms and door handles
- Additional Cleaning Efforts
 - Doubling cleaning and sanitizing efforts through a third party contractor after service hours at night





Social Distancing Efforts

- All Sun Metro employees on staggered shifts
- Fares waived on March 22nd for Fixed Route, Brio and LIFT
- All passengers board through the back door to limit contact between passengers and operators
 - The front of the bus/operator areas have been cordoned off with caution tape
- Passengers with accessibility needs requiring deployment of the ramp board through the front doors
- Seat closed signs have been placed on seats in a staggered layout for suitable spacing between passengers
- Operators are enforcing 'No Standing Loads' rule
 - Extra standby buses are in place to aid with excessive loads at high ridership bus bays





Service Modifications

- Sunday Service Schedules were implemented on March 22th to coincide with ridership decline and enforce the 'Stay Home, Work Safe' rule:
 - Mon Sat routes running on a Saturday schedule:
 - Routes: 19, 43, 71, 73
 - Alameda, Dyer, Mesa Brio routes (headways every 20 min)
 - Mon Fri:
 - Rts. 3 and 42 (keep peak service hours)
 - Sunday service along with routes 83 and 84 remain unchanged
- Streetcar service was cancelled on March 22nd



Stop the Spread of Germs

Help prevent the spread of respiratory diseases like COVID-19.





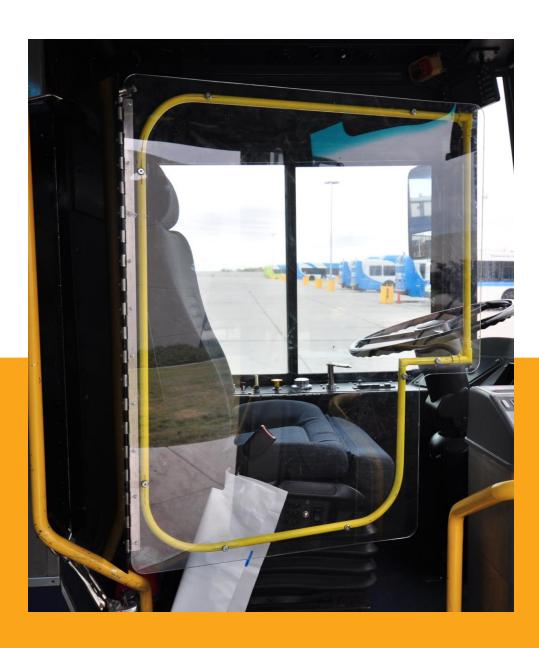




Passenger & Employee Safety Efforts

- Sanitizing stations have been added at all transit facilities so passengers can continually sanitize their hands
- CDC approved posters have been placed throughout transit centers, shelters and inside buses to encourage good hygiene and social distancing tactics
- Operators have been issued hand sanitizing solution, masks and gloves





Future COVID-19 Efforts

- Plexiglas Shield Implementation:
 - Installation of Plexiglas on all buses will offer additional protection between operators and passengers
 - Three prototypes will be designed and tested this week
- LIFT Scheduled Rides from Fixed Route:
 - Partnership with LIFT Pick-up service to provide rides for passengers with accessibility needs and further limit the contact between operators and passengers when helping to maneuver and strap down wheelchairs
- FTA CARES Act Grant:
 - Working with FTA to implement the CARES Act grant for additional COVID-19 funding to offset operations and capital expenses incurred during the pandemic



Post COVID-19 Efforts

- Continuing to collaborate with all partners to assure Sun Metro transit services are safe and kept to the highest standards possible using the latest developing best practices
- The developing of future plans is under discussion on how service will be restored after the COVID-19 crisis has ended



Attachment 2: February 20, 2022 Service Equity Analysis

(See Below)

RESOLUTION

WHEREAS, Federal Transit Administration's (FTA) grant recipients are required to comply with the United States Department of Transportation Title VI Regulations (49 CFR part 21) and the FTA Circular 4702.1B, which sets out the new criteria for FTA recipients; and

WHEREAS, the City of El Paso's Mass Transit Department (Sun Metro) is an FTA grant recipient; and

WHEREAS, Sun Metro is required to have a Title VI Program (Program) under the federal regulations; and

WHEREAS, the Program sets out the policies and procedures for Sun Metro to evaluate proposed service and fare changes to determine whether the planned changes will have a disparate impact on the basis of race, color, or national origin, or a disproportionate burden on low-income populations.

WHEREAS, Sun Metro conducted Major Service Change Equity Analysis for compliance with Title VI of the Civil Rights Act of 1964, as amended and guidance found in FTA Circular 4702.1B.

WHEREAS, the City of El Paso's Mass Transit Department (Sun Metro) and the City of El Paso adopted the Major Service Change Equity Analysis with changes made due to the COVID-19 Service Reduction, Sunday/Holiday Service Elimination and New Service Implementation; and

WHEREAS, the City of El Paso Mass Transit Department would like to adopt the Federal Title VI Major Service Change Equity Analysis.

BE IT RESOLVED BY THE MASS TRANSIT DEPARTMENT BOARD OF THE CITY OF EL PASO:

That the City of El Paso adopts the City of El Paso's Mass Transit Department's (Sun Metro) Federal Title VI Program: Major Service Change Equity Analysis.

(Signatures Begin on Following Page)

APPROVED this 18t day of march 2022.

CITY OF EL PASO:

Oscar Leeser, Chairman Mass Transit Board

ATTEST:

Laura D. Prine Secretary

APPROVED AS TO FORM:

Wendi N. Vineyard Assistant City Attorney APPROVED AS TO CONTENT:

Ellen A. Smyth, Marlaging Director Sun Metro-Mass Transit Department

Sun Metro

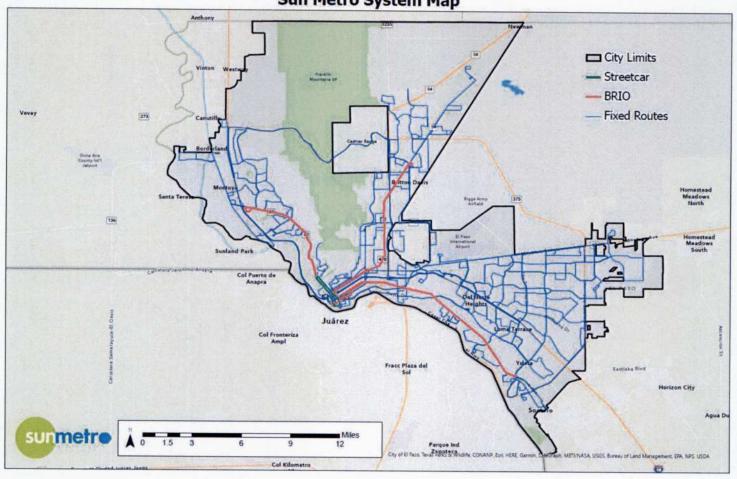
COVID-19 Major Service Change

Equity Analysis for Service Reduction, Routes' Elimination and Sunday & Holiday

Service Elimination and

Additional Service Implementation

Sun Metro System Map





Pursuant to FTA C4702.1B

Submitted by City of El Paso _ Sun Metro

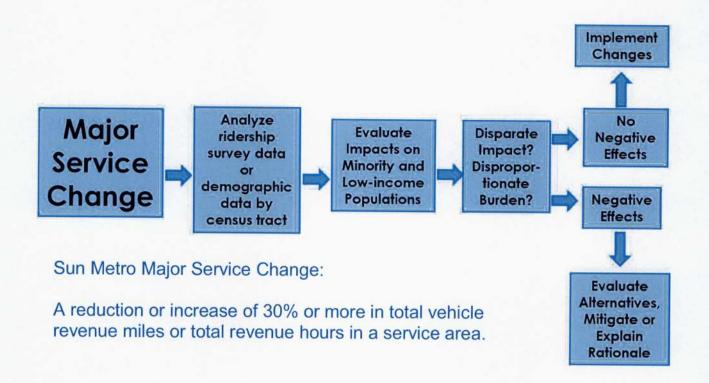


Introduction

Under Title VI of the Civil Rights Act of 1964, as amended, as recipients of federal financial assistance, Sun Metro, without regard to race, color, or national origin, operate and plan for transit services so that:

- Transit benefits and services are available and provided equitably
- Transit services are adequate to provide access and mobility for all
- Opportunities to participate in the transit planning and decision-making process are open and accessible
- Remedial and corrective actions are taken to prevent discriminatory treatment of any beneficiary

Major Service Change Equity Analysis Process



The FTA requires recipients of transit program funds to "evaluate significant system-wide service changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact." Those include temporary, major changes in effect for 12 months or more and those that will become permanent.

When a service change is proposed, there shall be a twelve-month look-back to determine if the aggregate of any changes in the prior twelve (12) months would have triggered one of the major service change criteria.

Therefore, Sun Metro is conducting this Title VI Major Service Equity Analysis for the impacts of the permanent and temporary service adjustments in response to the public health emergency and pandemic of 2020 and severe bus driver staffing shortages.

This Title VI Major Service Change Equity Analysis was conducted by Sun Metro to comply with FTA requirements. In this analysis, Sun Metro is evaluating the impacts of permanent and temporary major service changes to the fixed-route network that would allow it to:

- Adapt to lower ridership demand because of the COVID 19 pandemic while maintaining critical links between communities and providing a framework to rebuild ridership post-pandemic.
- Elimination of Sunday serviced due to bus drivers' shortage and staffing efforts to reinstate Sunday service once Sun Metro recruits and trains new drivers.

Major Service Change Policy

All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change.

A Title VI Equity Analysis completed for a major service change must be presented to the Sun Metro Transit Board of Directors for its consideration and included in the Sun Metro Title VI Program with a record of action taken by the Board.

Sun Metro has defined a major service change as a reduction or increase of 30 percent or more in total vehicle revenue miles or total revenue hours in service on any service area during a service review period.

The following service changes are exempted:

- Changes to a service on a route with fewer than 20 total trips per unit are not considered "major" unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than twelve months.
- Sun Metro -operated transit service that is replaced by a different mode or operator providing a service with the same or better headways, transfer options, span of service, and stops.
- Deactivation of a route if it does not reach above 10 passengers per hour or 1.0 passenger per mile after 6 months' period of implementation.

Sun Metro Title VI Compliance

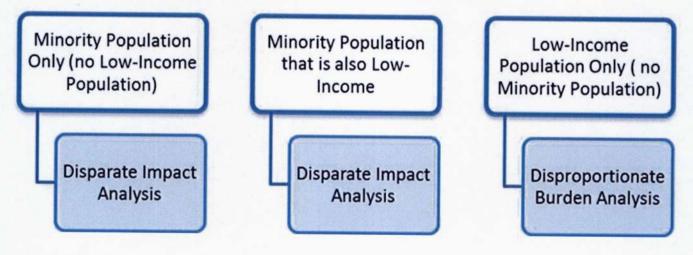
In the fall of 2014, Sun Metro updated its Title VI Program, which received concurrence by the Federal Transit Administration (FTA) in September of 2015. The program outlines agency policies, definitions, and procedures for complying with Title VI and performing equity analyses. This includes the agency's major service change, disparate impact, and disproportionate burden policies.

Disparate Impact Policy on Minority Populations

- 1. Must analyze how the proposed action would impact minority as compared to nonminority populations.
- 2. Determine if the adverse impacts of a major service change or fare adjustment is established over 25% based on the cumulative impact of the proposed service and/or fare changes.
- **3.** This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

Disproportionate Burden Policy on Low-Income Populations

- 1. Applies only to low-income populations that are not also minority populations.
- 2. Determine if the adverse impacts of a major service change or fare adjustment is established over 25% based on the cumulative impact of the proposed service and/or fare changes.
- **3.** This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.



Definitions

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Low-income population refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Minority: A person or passenger who identifies as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino (of any race), Native Hawaiian or Other Pacific Islander, or identifies as more than one race (multiracial) or some other race.

Minority Transit Route: A minority transit route is one in which at least one-third of the revenue miles are located in a Census block, Census block group, or traffic analysis zone where the minority population percentage is greater than the minority population percentage found in the service area.

Limited English Proficient (LEP) persons refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21:

Refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved" or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

Low-Income Route – The FTA defines this as a route that has at least 1/3 (33%) of its total revenue mileage in census blocks, block groups, or traffic analysis zone(s) with a percentage of below-poverty population that exceeds the system wide average. DDOT uses block group level data.

Predominantly minority area means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Demographics

El Paso is located in the Far West corner of Texas, separated only by an international boundary line in the middle of the Rio Grande River from its sister city of Ciudad Juarez, Chihuahua, Mexico. Together they form the El Paso/Juarez Metropolitan region that, with an estimated 2.5 million people, is the country's largest bi-national metropolis.

According to the 2012–2016 American Community Survey (ACS) 5-year estimates, the City of El Paso has a population of 678,058 and a land area of 257 square miles with an approximate density of 2,638 persons per mile. As of the 2010 Census, the El Paso urbanized area has included a population of 772,374, and 99 percent of population in the City of El Paso reside in the El Paso urbanized area.

Figure 1 displays the geospatial relationship between the service area of Sun Metro and the El Paso urbanized area in the Census 2010. Sun Metro is a municipal transit department established under the Chapter 453 of Texas Transportation Code to serve the City of El Paso.

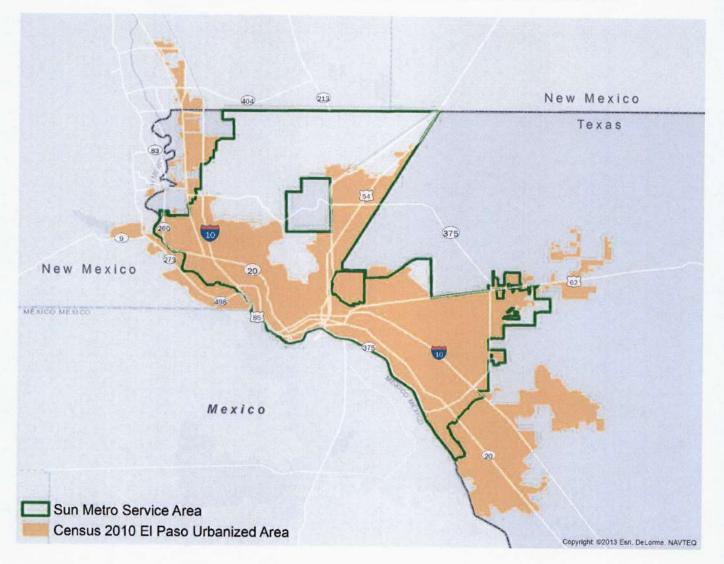


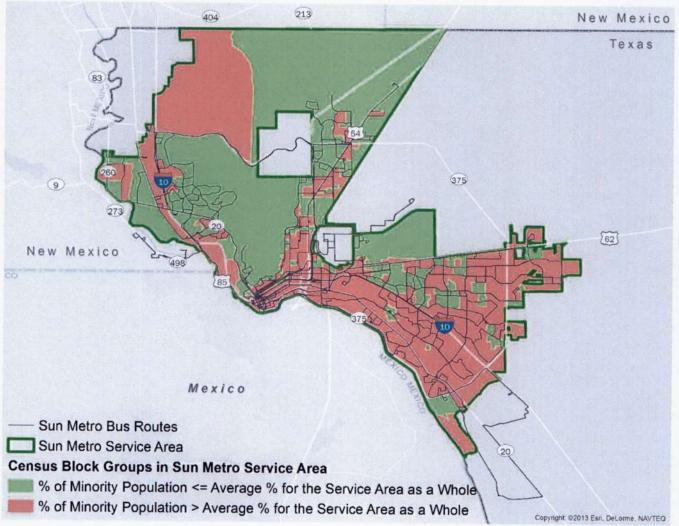
Figure 1. Sun Metro Service Area and 2010 El Paso Urbanized Area

Utilizing the 2016 ACS 5-year estimates, minority population groups' data was summarized to calculate minority population in the Sun Metro service area at the Census block group level. Among all block groups that intersect with the city limit of El Paso, 84.7 percent of the population identifies with a minority group.

El Paso has long been a majority-minority city where 80.8% of its residents claim Hispanic or Latino origin and 70.6% of those over the age of five years speak a language other than English at home.

Figure 2 compares each block group's percentage of minority population with the average for the entire Sun Metro service area to highlight areas with high concentrations of minority groups (red areas).

Figure 2. Comparison of Minority Population Percentage between Each Block Group and The Entire Sun Metro Service Area



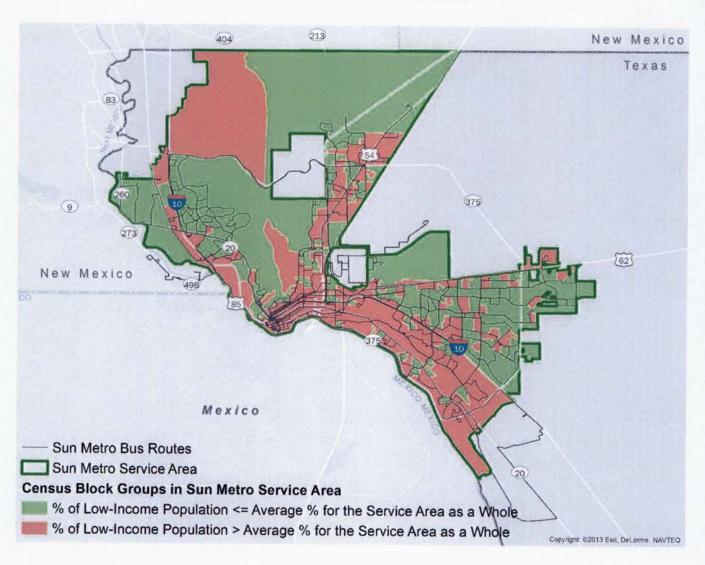
Sun Metro defines low-income persons as individuals whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)).

According to data obtained from the 2016 ACS 5-year estimates, 35.3 percent of the population within block groups that intersect with the city limit of El Paso has a family income at or below 150 percent of the federal poverty level.

El Paso is one of the poorer cities in the nation, with a per capita income that is only 70.2% of the national average, which meets the criteria of an Economically Distressed Area. The City's poverty rate of 21.5% far exceeds the 14.8% national rate. Communities with a higher percentage of households below poverty level are less likely to have access to reliable private transportation and therefore need alternate transportation.

Figure 3 compares the percentage of low-income population in each block group with the average for the entire Sun Metro service area to highlight areas with high concentrations of low-income persons (red areas).

Figure 3. Comparison of Low-Income Population Percentage between Each Block Group and The Entire Sun Metro Service Area



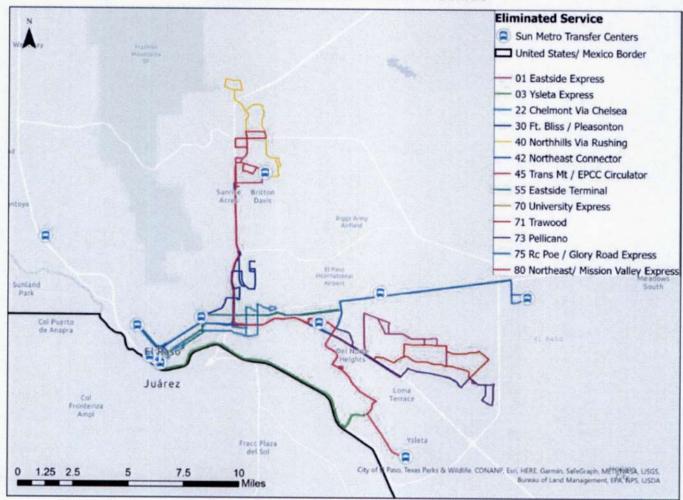
Description of Covid-19 Major Service Changes

Eliminated Service

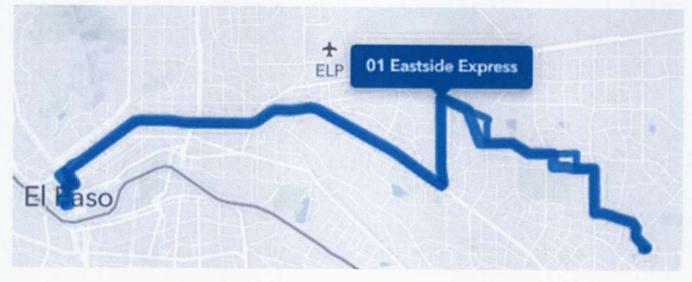
The following table list the temporary service changes made permanent. All of the changes that met the Major Service Change threshold occurred during the August 2020 to November 2021 review periods.

Sun Metro deactivated routes 1, 3, 11, 22, 30, 40 (part of the route was absorbed by route 46), 42, 45 (part of the route was absorbed by route 7), 55, 70, 71, 73, 75 and 80 due to low/zero riders and have been completely eliminated from the system except for Route 11 that has been reactivated.

Eliminated Sun Metro Routes



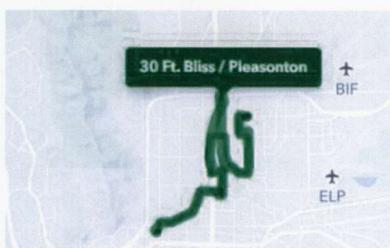
Route	Area Coverage by Other Routes
Route 1_Eastside Express	Covered by routes 53, 59, 74 and 205
Route 3_Ysleta Express	Partly covered by routes 62, 64, 67 and 206
Route 22_ Chelmont vis Chelsea	Route 21 is similar
Route 30_ Fort Bliss via Pleasonton	Covered by routes 32 and 33
Route 40_ North Hills via Rushing	Covered by routes 44 and 46
Route 42_ Northeast Connector	Partly covered by routes 7 and 207
Route 45_Transmountain EPCC Circulator	Partly covered by route 7
Route 55_Eastside Terminal	Partly covered by routes 2, 25 and 50
Route 70_ University Express	Covered by routes 59 and 205
Route 71_Trawood	Route 72 is similar
Route 73_Pellicano	Partly covered by routes 8 and 74
Route 75_Glory Road/RC Poe Express	Covered by routes 5 (new), 6 (new), 59 and 205
Route 80_Northeast/ Mission Valley Express	Covered by routes 7 and 63



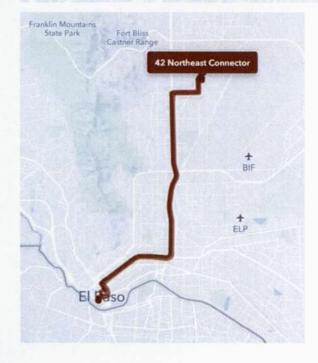


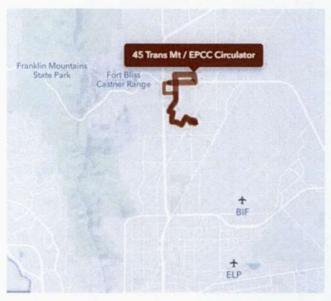
Page 9 of 32





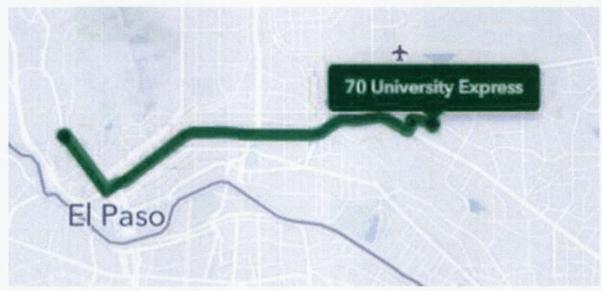


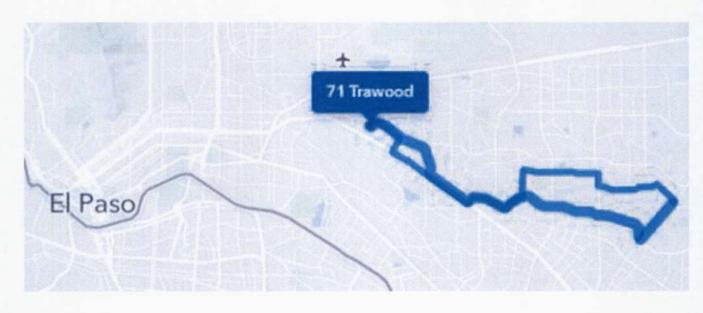




Page 10 of 32













Page 12 of 32

Additional Service

To provide better service for the community, Sun Metro added new routes to cover underserved areas and areas with higher ridership.

New Service

Route 2_ Five Points Expre	Route	2 Five	Points	Expres
----------------------------	-------	--------	---------------	---------------

Route 6_ Far East/Mission Valley Express

Route 37_ Northgate via Dyer

Route 56_ RC Poe/Far East Circulator

Route 68_ Lee Treviño

Route 82 Mission Valley via Pasodale

Route 5_ Far East/Cielo Vista Transit Center Express

Route 8_ Gateway Express

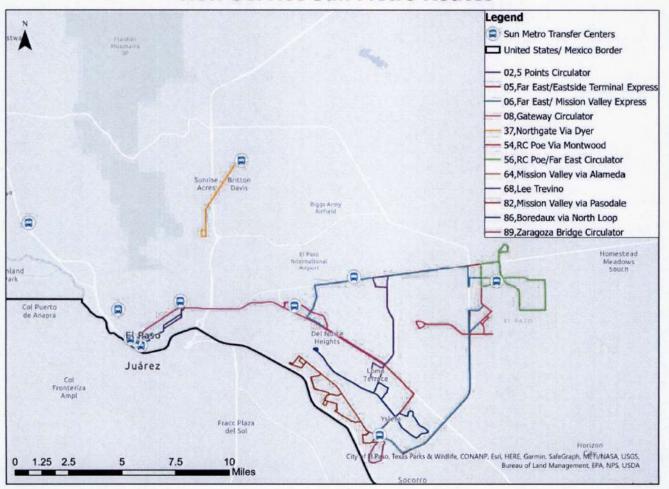
Route 54 RC Poe via Montwood

Route 64_ Valle Verde via Paisano

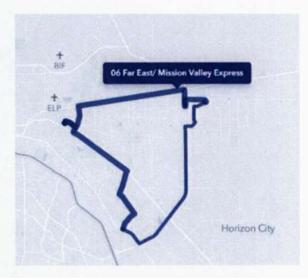
Route 86_ Bordeaux via North Loop

Route 89_ Zaragoza Bridge Circulator

New Service Sun Metro Routes



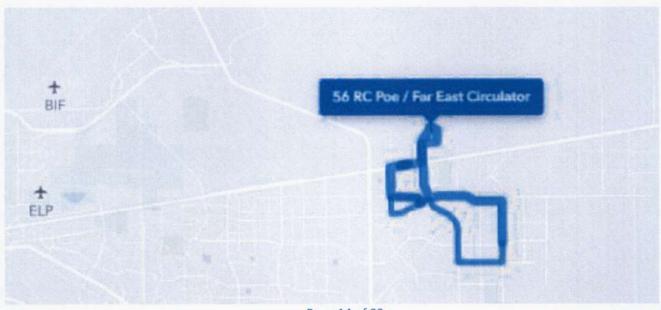
Page 13 of 32



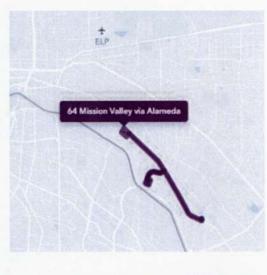


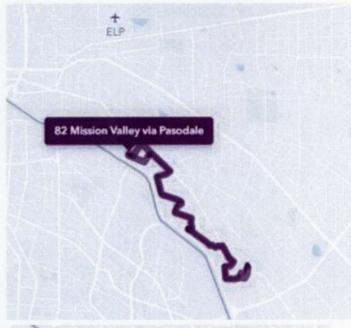






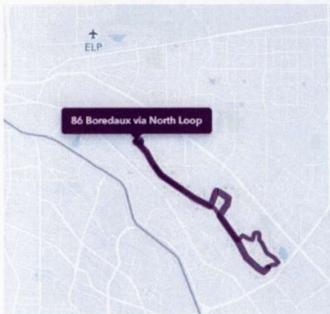
Page 14 of 32











Page 15 of 32

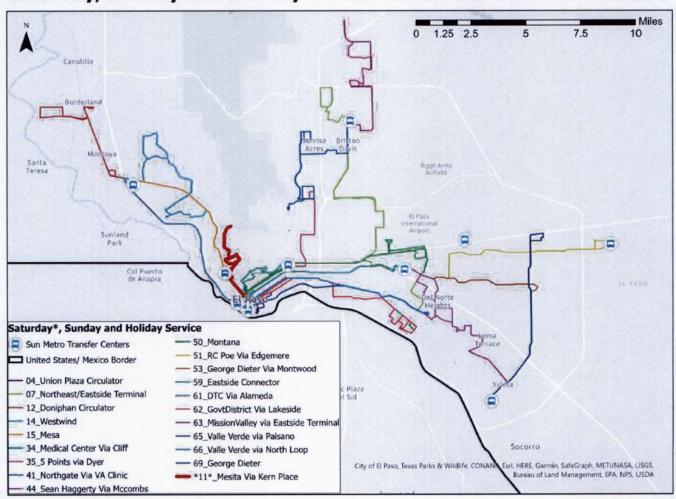
Description of Sunday and Holiday Service Elimination due to Bus Drivers' Shortages

Transit agencies around the country are struggling to retain their bus operators and Sun Metro is not the exception. On December 6, 2020, Sun Metro made the decision to completely eliminate Sunday/Holiday service. The nineteen (19) routes servicing the community on Sundays and Holidays were eliminated due to staffing shortages as follows:

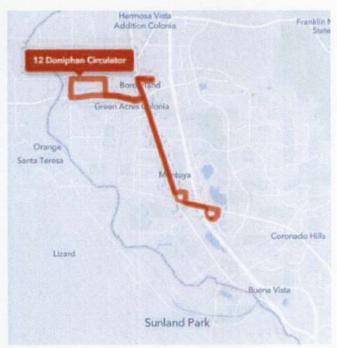
- Route 4-Union Plaza Circulator
- Route 7–Northeast/Mission Valley
- 3. Route 12-Doniphan Circulator
- Route 14–Westwind
- 5. Route 15-Mesa
- 6. Route 34-Medical Center via Cliff
- 7. Route 35-Five Points via Dyer
- 8. Route 41-Northgate/VA Clinic
- 9. Route 44–Sean Haggerty via McCombs
- 10. Route 50-Montana

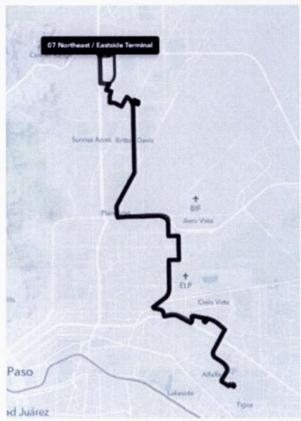
- 11. Route 51-RC Poe via Edgemere
- 12. Route 53-George Dieter via Montwood
- 13. Route 59-Eastside Connector
- 14. Route 61-DTC via Alameda
- 15. Route 62-Government District via Lakeside
- Route 63–Mission Valley/Cielo Vista Transit Center
- 17. Route 65-Hacienda Via Carolina
- 18. Route 66-Valle Verde via North Loop
- 19. Route 69-George Dieter

Saturday, Sunday and Holiday Service Eliminated Sun Metro Routes





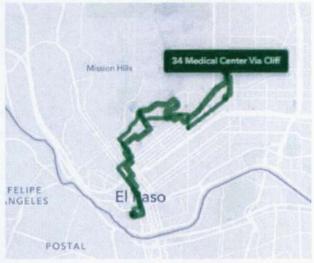


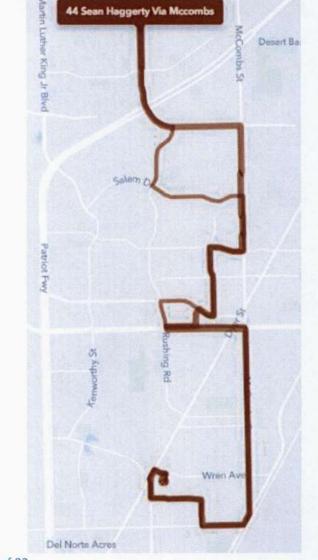


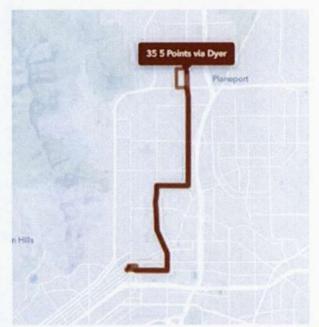






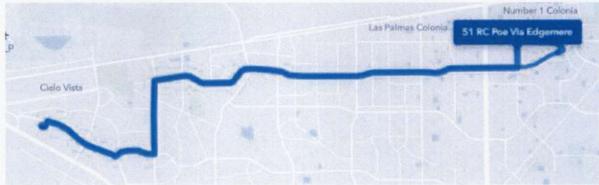


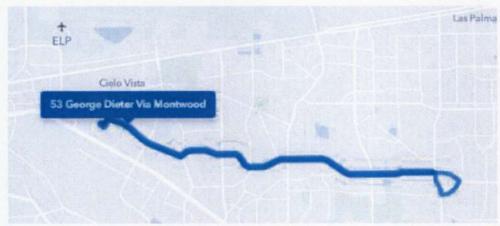




Page 19 of 32









Page 20 of 32







Page 21 of 32







Page 22 of 32

Route 11 Saturday Service was eliminated due to low/zero riders.



Sun Metro's efforts to reestablish Sunday and Holiday Service.







Methodology

Sun Metro utilized Remix to conduct this service equity analysis. Remix has the capability to automatically generate a Title VI report (2012-2016 American Community Survey data) by comparing existing fixed routes to the proposed changes. Remix implements the following methodology to provide accurate service equity analysis data:

- 1. Calculate low-income and minority population within 1/4 mile of current and proposed fixed route
 - For each route, build a shape that represents the area within quarter mile of any of its route alignment

- Intersect the catchment area with 2012-2016 ACS Census data. Get a list of block groups and the percentage overlap with each.
- For each block group, take the percentage of overlap and multiply it by the block group's statistics
- 2. Compare the number of people-trips, before and after
 - Multiply the population near a route times the number of trips it makes (per year) to get "people-trips"
 - Repeat for low-income and minority populations to get "low-income people-trips" and "minority people-trips"
 - Compare these numbers between the current and the proposed versions of the route, to get a set of people-trip differences. Remix compares current or previous routes to proposed or temporarily changed, added or new routes that have the same name.
- 3. Get the total difference in people-trips across the transit system
 - Repeat the process above for every route in the transit system
 - Sum the difference in people-trips. This will return three numbers: total difference
 in people-trips, total difference in low-income people-trips, and total difference in
 minority people-trips.
- 4. Calculate the change borne by low-income and minority populations
 - Divide the total difference in low-income people-trips by the total difference in people-trips to get the percentage of change borne by those with low-income
 - Repeat for minority people-trips
- 5. Compare the percentage change to the average in the service area
 - Calculate the average percentage of low-income and minority populations across the entire service area
 - · Subtract from the change borne by those populations
 - Get two final numbers: the difference between the impact this set of transit changes had on low-income and minority populations compared to any average change

Major Service Change Equity Analysis Conclusions

Service equity analysis requires the route level be compared to the system, and individual route major changes may affect how other areas of the system operate.

Remix's Title VI engine calculated the Delta between the change in people-trips borne by low income/minority riders and the area averages for these demographics.

Service Area Characteristics:

Plack Crauna	Donulation	Low Incomo	Minority	Trips Before	Trips After
Block Groups	Population	Low-Income		WANTED TO SELECT THE S	
369	507,337	33.8%	86.4%	736,285	623,635

Minorities represent 88.7% of the population affected by these service changes. The area average is 86.4% for minorities, putting the Delta at 2.3%, which does not exceed the 25% threshold. The analysis determined that the service changes will NOT have a disparate impact on minorities.

Low-Income represent 38.9% of the population affected by these service changes. The area average is 33.8% for low-income riders, putting the Delta at 5.1%, which does not exceed the 25% threshold. The analysis determined that the service changes will NOT have a disproportionate burden on low-income population.

Impact Analysis Table	Low-Income	Minority
Change Borne	38.9%	88.7%
Area Average	33.8%	86.4%
Delta	5.1%	2.3%

All Changes	THE STREET, NAME OF	Dif	ference		
Both	People-Trips	People-Trips	People-Trips	Change	Change
directions				Borne by	Borne by
(Inbound &	(Population * Trips)	Low-Income	Minority	Low-Income	Minorities
Outbound)	-2,855,096,535	-1,109,520,777	-2,531,741,610	38.9%	88.7%

Public Participation and Outreach

Sun Metro is focused on ensuring passengers and public are well informed on post COVID-19 recovery plan service changes. As such, an outreach plan was developed that included all forms of communication platforms to reach the targeted audience.

The outreach strategy, as outlined herein, aligns with the recovery service plan and the strategic process taken to keep our passengers and community informed:

Marketing / Digital

- Website homepage and webpage
 - Prominent, dynamic, and evolving presence and use of graphics on both the Sun Metro homepage and a dedicated landing page
- Out of home advertising—bus shelters and bus placards
- Dynamic social media campaign across Sun Metro's Facebook and YouTube pages
- Ongoing digital and communication updates (e-blasts)

Customer Care

· Provide agents with Q&A's and training so as to answer questions from passengers

Community Engagement and Outreach

- Printed flyers for distribution on buses and terminals
- · Set-up information tables at each transit terminal with prints and details on service changes

Internal Communications

Develop and display poster boards in and around the Operations Department

Public Relations

- · Generate press releases as campaign builds and launches
- Post ad on local newspapers; El Paso Times, El Diario, El Paso Inc.
- · Proactively pitch media on the recovery service
- · Promote via social media channels

Government Relations

- Keep City Council members, senior leadership, staff, customers, stakeholders and the public informed
- Collaborate with government officials and key stakeholder groups about Sun Metro's plan to restart service

Timeline:

Messaging, outreach and artwork have been phased out as outlined below:

Date	Outreach Details
June 14	Website: Main Banner Notification with More Info Soon landing page
June 15 – June 19	Presentation on recovery plan to each individual city representative
June 22	Presentation at City Council Work Session for Mayor, City Manager, City Council
June 23	Interview with KFOX/CBS4 on PPT to Council Members
June 25	Service Improvements Q&A added to webpage
June 28 – July 4	Soft launch: Service modification information prints are placed at each transit center cashier window for passengers to take

July 5 – July 11	Information Tables: Sun Metro staff set up info tables and passed out service modification prints at transit terminals to passengers. Info was posted on social media daily with outreach schedule
July 5	Service modifications flyers are distributed on all buses in operation for passengers to receive
July 8	Email blast about Virtual Public Meetings with link to join
ouly o	Service modifications info added to website
July 13	Routes Returning placards placed on buses
July 15	Virtual Meeting at 11:00AM, live video on Sun Metro's YouTube and Facebook channel
July 16	Virtual Meeting at 6:00PM, live video on Sun Metro's YouTube and Facebook channel
July 20	Routes Returning shelter poster advertisements placed on 10 shelter locations around town
July 21	Email blast about return of full service through Constant Contact service
	COEP Fact Friday video for Facebook and YouTube
July 24	Information Tables: Sun Metro staff set up info tables and
Aug 3 – Aug 7	passed out schedule paper at transit terminals to passengers. Info was posted on social media daily with outreach schedule

Date	Mode of Outreach	Outreach Details
Oct 13, 2021	Strategic Briefing Review	Presentation at Strategic Briefing Review to City Leadership to include City Manager
Oct 13, 2021	Call Center	Provide route schedules to Call Center staff to ensure community is properly informed.
Oct 13, 2021	Handout	Launch service modification handouts on buses in operation and at transit centers via A-frames.
Oct 15, 2021	News Release	Press release on service modifications released.
Oct 15, 2021	Social Media	Launch social media outreach for service modifications.
Oct 15, 2021	Website	Notice for service modifications is posted on Sun Metro website.
Oct 15, 2021 – Oct 18, 2021	Media Coverage	Articles are published by various media outlets on community meetings and information on service modifications.
		Sample coverage: https://www.ktsm.com/news/public-invited-to-meetings-about-sun-metro-service-changes/

Oct 17, 2021 – Oct 23, 2021	City Council Briefing	Presentation on service modifications to each City Representative.
Oct 17, 2021	Newspaper Ad	Notice for service modifications is published in the El Paso Times.
Oct 17, 2021	Newspaper Ad	Notice for service modifications is published in the El Diario.
Oct 18, 2021 – Oct 29, 2021	Outreach Team Mobilization	Outreach Team distributes service modification handouts on buses in operation and at transit centers.
Oct 18, 2021	Public Meeting	Community meeting to inform the public of service modifications held at 11:00am.
Oct 18, 2021	Public Meeting	Community meeting to inform the public of service modifications held at 6:00pm.
Nov 17, 2021	Handout	Launch paper schedules highlighting service modifications.
Continuous	Call Center	Call Center accepts and maintains log of customer feedback on routes.

Sun metro reached out to disadvantaged populations and made sure that Sun Metro's LEP needs were met.

STAY HOME HELP SLOW THE SPREAD

Sun Metro will not operate on Christmas or New Year's Day

Effective Dec. 6 Sunday service will be suspended until further notice

QUÉDESE EN CASA AYUDE A PARAR EL CONTAGIO

Sun Metro no operará en el día de Navidad o el Año Nuevo

A partir del 6 de diciembre el servicio de domingo será suspendido hasta próximo aviso





Public Comments

Route/Service	
53 and 54 WBH	Customer is asking if there could be a slight time adjustment to route 54 RC Poe via Montwood. Customer connects with route 53 George Dieter via Montwood and both route 54 and 53 get to the same location at same time to make the connection going to Cielo Vista Terminal. This makes it hard because customers are always missing the bus 53 because of time conflict with bus 54 arriving at the same time or a minute or two late to the time 53 departs to Cielo Vista Terminal. Caller stated once we do have route for New Beaumont hospital that it should only run 3 x a day morning, noon, and at 6:00 P.M.
19	POR FAVOR PODRIAN REGRESAR EL HORARIO A LA RUTA 19 NECESITO MUCHO EL HORARIO ANTERIOR EN DONDE INCLUIAN CORRIDAS A LA 1PM Y 2PM GRACIAS
WBH	Mr. Vega called to suggest that we use Routes 5 and/or 6 to go to the new Beaumont hospital.
Sunday	To Whom it May Concern: I have noticed that the IVR System has been down for several weeks now and so I reported to an evening dispatch by the name of Perla who mentioned that an email will be sent. Instead of giving an Estimated Time of Arrival as it normally does, it is saying "There is No ATS Resource Available" Is the there a reason it continues to be down, is it because of an upcoming improvement forthcoming. Any idea as to when the subscription will become active again? Please consider bringing it back as well as possibly starting a piloting program to bring back Sunday service. I'm thinking starting out small and then eventually expanding as if it was a Saturday service. Just throwing out ideas for consideration as it's been brought to my attention that there is a new ADA Coordinator in place now.
Sunday	Caller does not like the fact that buses will not be running as of 12/6/20 on Sundays. Caller states he works and needs the bus on Sundays.
Sunday	This is actually a complaint. Since shutting down service on Sundays, you have really impacted my life. I work 2 jobs and work 7 days a week. Now with no service on Sundays, I have to walk 5 miles to and from work during the day and late at night. I currently do not have a car, so that is not an option. You should really ask your riders what is in their best interest. Stopping service on Sunday, which is sometimes the only day that persons have to do their shopping, really SUCKS!!! You don't need to contact me because you probably don't care about how we out here feel. You need to THINK before you implement something that will may a major effect on others.
Sunday	Why don't you run on buses Sunday? This is ridiculous what do I pay taxes for. When will fix it?!!!!!!
Sunday	Please bring back bus transportation on Sundays. A lot of us work on Sunday and/or bus is only form of transportation- not having transportation is very inconvenient. PLEASE.
Sunday	Caller would like to know when the Sunday routes will be in service.
Sunday	CSR Customer wants the Sunday service back
, september 1	Caller stated that she wanted to know that why we are not having Sunday services and i explained to her that the service had been stopped due to the Virus and because we were loosing money and she kept telling me that how can that be because she works on Sunday and that wants the services to come back because she is not he only one waiting for the buses and i tried to explain and she just did not want to hear it from me the answers i was giving to her so she wanted a call back about this. Customer also stated that she would prefer if we increase the bus fare instead of getting rid of the Sunday routes and also suggested that we put a suggestion box at the
Sunday	CELLINGALISTS.
y de la company	Customer suggest to bring route 18 back because there is no other bus route that do that same route. He also suggested to do some schedule changes on route 17, he says that the last trip that starts at the Westside terminal at 9:40 PM should not exist because it has no passengers at all and it's a danger for the driver to be out so late with no rider ship. That they should change that ride in the morning during the day instead. He also mention that they should have left the schedules as they were a couple years ago.
Cumpan	I was wondered and Metro expects Sunday services to resume. We gave a handicapped friend who utilizes the bus to attend church. When are Sunday services
600	Caller is complaining about the weekly pass costing her \$12 and the pass reads Monday thru Sunday, with no Sunday service. She would like the buses to run on Sunday ONLY
Sunday	FOR PEOPLE WHO WORK AT WAREHOUSES. She would like a call back from someone to state that they are rooking into this and that something will be used.
Sunday	Customer wants to know when fixed routes and LIFT will be running again on Sundays.
Sunday	Hi, Could you please tell me when the Sun Metro Lift shuttle will be running on Sundays again? And when will the Sun Metro Buses be running on Sundays? Now that the city is opening up, shouldn't the Lift and Buses also open up on Sundays and get back to regular schedules? Thank you, Trisha C.
Sunday	Hello, I am inquiring as to wether Sun Metro will resume Sunday service anytime soon? I am a new rider and would like to attend worship service on Sunday mornings. Thanks in advance and know that wour consider is expellent I am you grateful to ride Sun Metro to doctor appointments, grocery needs etc. Kind regards, Nadine Lopez

Route/Service	Incident Details
Sunday	Customer states he wants to know when Sun Metro will start its Sunday service again because he states it is really affecting him because he has to work on Sunday. Customer states no service on Sunday is affecting him and a lot of people that there only way to get around is the bus.
Sunday	When will the Sun Metro Lift shuttle and the Sun Metro buses start operating again on Sundays? Thank you.
Sunday	The customer is complaining about not having any service on Sundays. He said that he would have liked to be notified with a letter about the cancellation of the service or any changes to it, and he would like to have the service back as soon as possible.
Sunday	Caller is calling about Sunday Routes being eliminated and Routes being cut in half. Caller would like to make sure a supervisor calls him so he can be heard.
Sunday	Whoever did the route planning should rethink the planning. Since all the last changes were made it's really difficult to ride the bus without waiting long time or missing the transfers, specially for the seniors. Also, bring back the Sunday service please. Would like to have a call back
Sunday	I don't understand the DISERVICE you are forcing on the disabled community of El Paso. Many disabled people use the regularly scheduled buses and the Lift Service as their only or at least primary means of transportation. Now you have CANCELLED any and ALL Sunday bus service including the Lift. This effectively limits the mobility of many of your clients that use the otherwise fine Sun Metro service throughout the week to get to work, the store, appointments and just taking care of life. TOTAL Sunday suspension of service clearly limits particularly those with disabilities. No church, no grocery shopping, no visiting friends, no movies. Homebound restriction because the city of El Paso and Sun Metro deem Sunday service as NOT necessary. In fact it is CRITICAL to the well-being of this community. Please re-think this wrong, capricious, paternalistic and somewhat persecutorial position that prejudicially effects many El Pasoans. OPEN THE SUNDAY BUSES!!
Sunday	Customer is asking for the Sunday service to come back please.
Sunday	Customer states she does not agree on the fare changes because of the cut on route service, no service on Sunday, and why would they have to pay more with less service. Customer states now with the Covid Pandemic there is a lot of people that will not be able to afford the bus service.
Sunday	Which route are going to be added.? Like Sundays routes
Vebrus	Good evening, I thought I'd share my thoughts on the discussion of raising the rates of the prices of the fares. I do not drive so I do use the Sun Metro buses and the Sun Metro Lifts mostly to go to and from work. If the prices were to increase it would cause a financial burden on me, I know a lot of people would be struggling as well. I've seen elderly people barely have enough for the fares that are in place now, so raising the prices would only hurt people more. Also, Sunday service for the lift really needs to come back soon. I know a lot of people need that service to go get groceries and/or dialysis appointments. Please reconsider raising the prices and bringing back Sunday services soon.
Sunday	Caller does not agree with the rates going up on the fare. He states that it is not fair, not all buses are running and no Sunday service.
Sunday	When will sunday routes begin to run again!?
Aepuns	I heard on the news tonight about the propose fare changes and I am appalled. The idea of \$5 for a day pass for the average rider is absolutely insane. Do you think you are Dallas which also includes riding their light rail? That is a prohibitive cost for a commuter and will likely result in fewer riders than you have now. As a senior, I would rather pay a little more like \$.50 each way or \$3.50 or \$4 for a weekly pass to see you stop the plan to gouge commuters or occasional riders. Your new routes and schedules have impacted me negatively because it is now almost impossible for me to get where I need to go. And this cancelling all Sunday buses certainly impacts church goers and, in case it never occurred to you, people who used to take the original Route 51 for Sunday visitation at the jail annex now can't visit since it is about to reopen for visitation. I used to brag about the great bus service when I moved here from Dallas 5 years ago. Now, for me, it is a disaster and doing nothing but getting worse for me and also for my son who would have to pay that outrageous new fare proposal. You never responded to a former complaint so I doubt you would respond to this one.
Áepuns	I have to email you to let you know how appalled I am by the numerous route changes and the lack of Sunday service. Now, since we have far less service than we used to, you want to raise the fares! I am a 72-year-old woman on a fixed income, I have no friends or relatives with a car to take me places. I rely heavily on the buses. I was also taking the streetcar frequently when it was still running. There is now no Sunday service to any part of town. Don't you realize people also need to go places on Sundays? Some of us go to church, others have to work, others Sunday may be their only day off to go to the store! We need Sunday service! I live in the downtown area currently but some of us go to church, others have to work, others Sunday may be their only day off to go to the store! We need Sunday service! I live in the downtown area currently but previously lived in Northeast. While in the Northeast I used to take 42 every Sunday to come downtown for Mass at Immaculate Conception Church and then go to the Tap for menudo, and during football season stay and watch the Cowboys play - I cannot even guess how many other people were taking 42 for similar reasons! I used to see people with work badges also, others just going to go shopping downtown. Since I have been living downtown, you cut the #9 route which was usually pretty full. I accepted that and starting taking #4 which does not have all the stops the 9 did. Then the streetcar started and I had more options for shopping and going to church. I am very blessed that I am in good health and get around fairly well, but so many of the people I see on the bus are not as fortunate as me and I have no idea what they do on Sundays if they want to go to and it is hard to do this in the heat or in inclement weather. We need the streetcar back and we need Sunday buses back. The routes have gotten ridiculous - my son had to rely on the buses for awhile to get to and from work but have one bus to get to and the

	Incident Details
Route/Service	in the lift and th
-	Customer states she lives in the Northeast part of the city and she is requesting the Sunday service be brought back because she usually uses the bit out able to go to church and do other things she needs to do.
Sunday	regular routes are not working of contrasts and processes to and from to get to her destinations. States we should leave the price the same for Customer does not agree with the increase in fares because she has to take 2 buses to and from 5 bunday service and holidays if we are going to increase the fares. Seniors and disabled and increase the fares for everyone else. She also states we should bring back Sunday service and holidays if we are going to increase the fares. Customer also stated was trying to use the sunmetrofares email but was getting a message of "restricted to authenticated senders."
	Caller would like for us to bring back Sunday schedule on buses. Caller states that it has affected so many passengers no bus on sundays especially those passengers that are
Sunday	caregivers.
vebuns	I'm Patricia Martinez from Mike and Tricia Mornings on 93.1 kiss rivi. We discussed the surgest and monthly passes but are being charged for a day they can't use want to know when the bus service will return on Sundays. They are dependent on the bus and have weekly and monthly passes but are being charged for a day they can't use the service. Is there any timeline for the return of Sunday service? Please advise as
Sunday	When will Sunday routes be running again !!!????
Sunday	Caller does not like the fact that buses are not running on Sunday. He states he was written up for not being able to get to work on Sunday. He would take in consideration that passengers need to go to work on Sunday.
, and a second	Caller would like for us to take in consideration the passengers that would take the bus on Sundays to go to work, or groceries. She would like for the Sunday buses to run
Sunday	again.
Sunday	Passenger expressed dislike about the fare increase. He stated that it would not be right to raise the fares if the bus is not even working on Sundays and routes are closed.
	Customer states he would like route 35 to leave the 5 Points Terminal but go all the way to the Northgate Terminal. Customer states he would like Sun Metro to consider having Route 33 the last one to leave the Airport at 10:30 PM and Route 50 to leave the airport at 10:45 PM because there are a lot of people arriving late and there is no buses.
	Customer states he would like Route 55 brought back also. Customer states he does agree with the buses not running on Sundays and Holidays. Customer states if someone wants to call him back he usually needs at least 8 rings on the
Sunday	phone to get to it or after 8 rings you could leave a message.
Sunday	I'll ask again when are Sunday routes returning again? I'm getting tired of walking to my job. It's about a 5 mile walk and 5 miles back. The have to wait long times for the routes or the
Sunday	Customer is suggesting to hire more people so the service of LIFT and the fixed routes improve. In a way customer is suggesting to hire more people so the service and the waiting time should be less in between transfers LIFT buses. Neither LIFT or the fixed routes can't cope anymore. Hiring more people can help to improve the service and the waiting time should be less in between transfers or waiting for the LIFT, also you can open the Sunday service too. Everything is starting to normalize and a lot of people work on Sundays. Will also send to LIFT and Ops-DG or waiting for the LIFT, also you can open the Sunday service too. Everything is starting to normalize and a lot of people work on Sundays. Will also send to LIFT and Ops-DG
Sunday	Caller wants to speak to anyone that is in charge of suspending Sunday service and raising the fare prices.
Sunday	Customer is requesting that we bring back Sunday service.
Sunday	Hello, Do you plan to resume Sunday service?
Sunday	Hi, When will the Sun Metro buses and Lift shuttle services resume services on Sundays? I mank you I mank you will the Sun Metro buses and Lift shuttle services resume services on Sundays?
	Customer does not agree with the fare proposal. He says they are too high for the service given, he did they are too high for the service given, he did they and he does not speak English. He would like to have a call back so he can give his opinion with more details. Called customer to discuss his issues, he started by saying why is it that Sun Metro didn't open a discussion with the Spanish speaker user, since according to Mr. Valdivia, most of the users are Spanish speakers, he also said that saying why is it that Sun Metro didn't open a discussion with the Spanish now the service is not excellent, bus drivers are rude, not all of them or course, buses run late, if the fares are raising then customer service has to upgrade as well since right now the service is not excellent, bus drivers are rude, not all of them or course, busins there is no service on Sundays. He is willing to openly discuss if there is another meeting with the users but he insists on the subject that it has to be as well for Spanish
Sunday	Speakers. CM
	I am a person who uses a wheelchair. I depend on both the Lift and the fixed route services to get around El Paso. As of coday there is suit to work on any transportation service will resume on services for Sundays. Essentially this cuts me off from attending and serving my church community. Can you give me any information as to when service will resume on services for Sundays.
Sunday	Sundayse

Attachment 3: December 2021 Service Equity Analysis

(See Below)

RESOLUTION

WHEREAS, Federal Transit Administration's (FTA) grant recipients are required to comply with the United States Department of Transportation Title VI Regulations (49 CFR part 21) and the FTA Circular 4702.1B, which sets out the new criteria for FTA recipients; and

WHEREAS, the City of El Paso's Mass Transit Department (Sun Metro) is an FTA grant recipient; and

WHEREAS, Sun Metro is required to have a Title VI Program (Program) under the federal regulations; and

WHEREAS, the Program sets out the policies and procedures for Sun Metro to evaluate proposed service and fare changes to determine whether the planned changes will have a disparate impact on the basis of race, color, or national origin, or a disproportionate burden on low-income populations.

WHEREAS, Sun Metro conducted Fare Equity Analyses for Route 4 (Free Circulator) for compliance with Title VI of the Civil Rights Act of 1964, as amended and guidance found in FTA Circular 4702.1B.

WHEREAS, in March of 2017, the City of El Paso's Mass Transit Department (Sun Metro) and the City of El Paso adopted the 2017 Fare Equity Analyses for Route 4 (Free Circulator); and

WHEREAS, the FTA updated the Fare Equity Analyses and the City of El Paso Mass Transit Department would like to adopt the new Title VI Fare Equity Analysis: Mobile Payment Option completed in 2021.

BE IT RESOLVED BY THE MASS TRANSIT DEPARTMENT BOARD OF THE CITY OF EL PASO:

That the City of El Paso adopts the City of El Paso's Mass Transit Department's (Sun Metro) Federal Title VI Program and updated Title VI Fare Equity Analysis: Mobile Payment Option.

(Signatures Begin on Following Page)

CITY OF EL PASO:

Oscar Leeser, Chairman Mass Transit Board

ATTEST:

Laura D. Prine Secretary

APPROVED AS TO FORM:

Wendi N. Vineyard

Assistant City Attorney

Wed N. Vigad

APPROVED AS TO CONTENT:

Ellen A. Smyth, Managing Director Sun Metro-Mass Transit Department

Sun Metro Title VI Fare Equity Analysis Mobile Payment Option and Periodic Free Streetcar Rides Ellen A. Smyth, P.E., Managing Director



Title VI Compliance

Strategic Goal 7.3: Enhance a regional comprehensive transportation system

Ensures that agencies receiving federal funds do not discriminate on basis of race, color, or national origin



Under Title VI of the Civil Rights Act of 1964, as amended, Without regard to race, color, or national origin:



As recipients of federal financial assistance Sun Metro MTB will operate and plan for transit services such that:

- Transit services are available and provided equitably.
- Transit services are adequate to provide access and mobility.
- Opportunities to participate in the transit planning and decision-making process are open and accessible.
- Sun Metro takes remedial and corrective actions to prevent discriminatory treatment of any passenger.



Title VI Fare Equity Analysis FTA Process



- Determining the number and percent of users of each fare type (Fare types include passes, special programs, discounts, increases, fare media, etc.)
- Evaluating the differences between minority users and non-minority users.
- Evaluate the differences between low- income and non-low-income users.
- Next, evaluate the impacts of the proposed changes to determine if there is a disparate impact or disproportionate burden.
- Sun Metro in 2017 established a threshold of 25% differential to stop proposed changes.
- Finally, if greater than 25% impact, evaluate alternatives and mitigation strategies offered to prevent or mitigate any potential undue burden.





Implement Changes



No Negative Effects

Any Fare Change



Analyze information generated from ridership surveys



Evaluate impacts on minority and low-income populations



Disproportionate Burden?

Disparate

Impact?



Negative Effects



Evaluate Alternatives,
Mitigate or Explain
Rational





What Changes are being Made?

Sun Metro's proposed changes are:

- Mobile ticketing option fare media
- Periodic Free streetcar rides







Table 1. Fare Type Usage by Low-Income Status, 2021

Fare Type	Low- Income	Low- Income Percent	Non- Low- Income	Non- Low- Income Percent	Total	Low-Income Burden
Adult Standard/Express Fare	699	86%	112	14%	811	-3 percentage points
Children Fare (age 6 – 18)	4	100%	0	0%	4	11 percentage points
Children under 5	1	100%	0	0%	1	11 percentage points
City Employee	4	67%	2	33%	6	-22 percentage points
Day Pass	192	89%	24	11%	216	0 percentage points
Free Ride COVID-19 Vaccine	3	75%	1	25%	4	-14 percentage points
LIFT Card (Free)	37	93%	3	8%	40	4 percentage points
LIFT Pass	12	92%	1	8%	13	3 percentage points
Military Fare	8	73%	3	27%	11	-16 percentage points
Military Monthly Pass	1	33%	2	67%	3	-56 percentage points
Military Weekly Pass	5	83%	1	17%	6	-6 percentage points
Senior/Disability Monthly Pass	47	89%	6	11%	53	0 percentage points
Senior/Disability Reduced Fare	328	93%	23	7%	351	4 percentage points
Senior/Disability Weekly Pass	74	85%	13	15%	87	-4 percentage points
Standard Monthly Pass	75	85%	13	15%	88	-4 percentage points
Standard Weekly Pass	242	90%	28	10%	270	1 percentage points
Student Fare	116	90%	13	10%	129	1 percentage points
Student Monthly Pass	9	82%	2	18%	11	-7 percentage points
Student Weekly Pass	28	97%	1	3%	29	8 percentage points
Token - Full Fare	31	91%	3	9%	34	2 percentage points
Token - Student Fare	4	100%	0	0%	4	11 percentage points
Transfer	29	97%	1	3%	30	8 percentage points
Grand Total	1949	89%	252	11%	2201	



- According to the survey data, as shown in Table 1, about 89 percent of surveyed Sun Metro riders who answered both the income and fare type questions were considered low-income.
- The largest discrepancy was still well below the 25 percent threshold, with a difference between expected and actual low-income of 11 percentage points.





Table 2.	Fare	Type	Usage	e by Minori	ty St	atus,	2021
	•-						

Fare Type	Minority		Non- Minority	Non-Minority Percent	Total	Minority Burden
Adult Standard/Express Fare	868	93%	63	7%	931	0 percentage points
Children Fare (age 6 – 18)	4	100%	0	0%	4	7 percentage points
Children under 5	2	100%	0	0%	2	7 percentage points
City Employee	6	100%	0	0%	6	7 percentage points
Day Pass	260	95%	13	5%	273	5 percentage points
Free Ride COVID-19 Vaccine	4	100%	0	0%	4	7 percentage points
LIFT Card (Free)	38	78%	11	22%	49	-15 percentage points
LIFT Pass	14	93%	1	7%	15	0 percentage points
Military Fare	8	62%	5	38%	13	-31 percentage points
Military Monthly Pass	0	0%	3	100%	3	-93 percentage points
Military Weekly Pass	5	83%	1	17%	6	-10 percentage points
Senior/Disability Monthly Pass	54	87%	8	13%	62	-6 percentage points
Senior/Disability Reduced Fare	433	94%	27	6%	460	1 percentage points
Senior/Disability Weekly Pass	93	93%	7	7%	100	0 percentage points
Standard Monthly Pass	84	88%	11	12%	95	-5 percentage points
Standard Weekly Pass	291	94%	20	6%	311	1 percentage points
Student Fare	163	96%	6	4%	169	3 percentage points
Student Monthly Pass	12	100%	0	0%	12	7 percentage points
Student Weekly Pass	32	100%	0	0%	32	7 percentage points
Token - Full Fare	49	94%	3	6%	52	1 percentage points
Token - Student Fare	4	100%	0	0%	4	7 percentage points
Transfer	41	98%	1	2%	42	5 percentage points
Grand Total	2465	93%	180	7%	2645	



- According to the survey data, as shown in Table 2, about 93 percent of surveyed Sun Metro riders who answered both the fare type question and the race/ethnicity question reported a race other than Non-Hispanic, White.
- Thus, the expected share of minority riders using each fare type option is 93 percent.
- The largest discrepancy was still well below the 25 percent threshold, with a difference between expected and actual minority of 7 percentage points.





Equity of Access to Mobile Payment Option

Table 3. Credit/Debit Card Use among Customers with Smart Phone by Minority Status, 2021					
Do you have a credit ordebit card or would you use it for Sun Metro Mobile Payment?	Minority Customers withSmart Phone	Non-Minority Customers withSmart Phone	Total Customers with Smart Phone		
Yes	787	73	860		
No	677	43	720		
Total	1,464	116	1,580		
Percent Responding "Yes"	54%	63%	54%		

- Considering minority customers with smart phones, 54 percent of these survey respondents also have a credit/debit card or are willing to buy tickets and passes via a mobile payment option, compared to 63 percent of non-minority users with smart phones.
- The 9-percentage-point difference between minority and non-minority smart phones users shown in Table 3 is well under the 25 percent threshold, so there is no disparate impact finding for introducing mobile payment option.





Equity of Access to Mobile Payment Option

- Forty-six percent of customers using smart phones said they would also use a credit or debit card to purchase Sun Metro tickets via the Mobile Payment option.
- There was little difference between low-income and non-low-income smart phones owners in their usage of credit or debit cards for Sun Metro fares.
- Forty-four percent of low-income customers with smart phones have a credit/debit card for Sun Metro, compared to 59 percent of non-low-income customers with smart phones.
- The 15-percentage-point difference between low-income and non-low-income smart phones users iswell
 under the 25 percent threshold, so there is no disproportionate burden finding for introducing mobile ticketing.

Table 7. Credit/Debit Card Use among Customers with Smart Phone by Low-Income Status, 2021							
Do you have a credit or debit card or would you use it for Sun Metro Mobile Payment?	Low-Income Customers with Smart Phone	Non-Low-Income Customers with Smart Phone	Total Customers with Smart Phone				
Yes	562	123	685				
No	705	86	791				
Total 1,267 209 1,476							
Percent Responding "Yes"	44%	59%	46%				



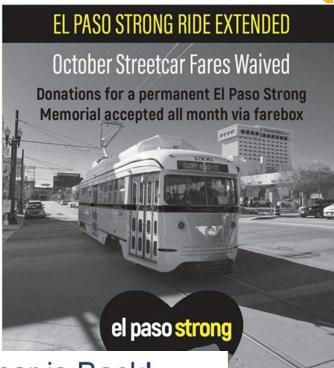


Public Outreach









Reminder:

Ride Sun Metro - Mobile Pay

- · Available for free on IOS and Android
- Bilingual

Recordatorio Ride Sun Metro – Pago Móvil

- · Disponible gratis en iOS y Android
- · Bilingüe



NEWS El Paso Streetcar is Back!

07/26/2021

Downtown, Uptown Routes Start Thursday, July 29

EL PASO, Texas –The El Paso Streetcar returns Thursday, July 29, 2021, providing service every Thursday, Friday, and Saturday this summer to complement quality of life events and services in downtown and uptown.

The streetcar will run from 4 p.m. to midnight on those days. Fares will be waived.

The public can easily hop on these vintage vehicles loaded with modern amenities at any of the 27 stops along a 4.8-mile loop that connects dining, entertainment and other venues in the area.









Mission

Deliver exceptional services to support a high quality of life and place for our community

Vision

Develop a vibrant regional economy, safe and beautiful neighborhoods and exceptional recreational, cultural and educational opportunities powered by a high performing government

☆ Values

Integrity, Respect, Excellence, Accountability, People

Attachment 4: October 2022 Fare Equity Analysis (See Below)

CITY OF EL PASO, TEXAS AGENDA ITEM DEPARTMENT HEAD'S SUMMARY FORM

AGENDA DATE: December 6, 2022 PUBLIC HEARING DATE: N/A

CONTACT PERSON(S) NAME AND PHONE NUMBER: Ellen A. Smyth, (915) 212-6000

DISTRICT(S) AFFECTED: All

STRATEGIC GOAL: 7.3 – Enhance a regional comprehensive transportation system

SUBGOAL:

SUBJECT: FOR NOTATION ONLY.

Title VI Fare Equity Analysis for modification in Discounted Fare and Expanded Hours for Streetcar. Under Title VI of the Civil Rights Act of 1964, as amended, as recipients of federal financial assistance Sun Metro Mass Transit Board, without regard to race, color, or national origin, operate and plan for transit services so that:

- Transit benefits and services are available and provided equitably.
- Transit services are adequate to provide access and mobility for all.
- Opportunities to participate in the transit planning and decision-making process are open and accessible.
- Sun Metro takes remedial and corrective actions to prevent discriminatory treatment of any beneficiary.

BACKGROUND / DISCUSSION:

N/A

PRIOR COUNCIL ACTION:

N/A

AMOUNT AND SOURCE OF FUNDING:

N/A

HAVE ALL AFFECTED DEPARTMENTS BEEN NOTIFIED? X YES NO

PRIMARY DEPARTMENT: Sun Metro

SECONDARY DEPARTMENT:

DEPARTMENT HEAD:

Astrid Bunner for Ellen Smyth, Chief Field Transit Officer

(If Department Head Summary Form is initiated by Purchasing, client department should sign also)





Title VI Fare Change Equity Analysis: Discounted Fare Change and Expanded Hours for Streetcar



Submitted by the City of El Paso Mass Transit Department, Sun Metro for compliance with Title VI of the Civil Rights Act of 1964, as amended and guidance found in FTA C4702.1B, dated October 1, 2012.

Title VI of the Civil Rights Act of 1964 "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."

TABLE OF CONTENTS

Overview	1
About Sun Metro	1
About El Paso	2
Definitions	5
Fare Structure and Discounted Fare Change	7
Sun Metro Title VI Compliance	
Fare Media	9
Fare Equity Analysis	10
Data Sources	
Fare Equity Analysis Methodology	12
Public Participation and Outreach	
El Paso Streetcar	22
Streetcar Extended Hours Public Outreach	22
2022 Onboard Sun Metro Rider's Survey Major Findings	
Conclusion	

OVERVIEW

Under Title VI of the Civil Rights Act of 1964, as amended, as recipients of federal financial assistance Sun Metro Mass Transit Board, without regard to race, color, or national origin, operate and plan for transit services so that:

- Transit benefits and services are available and provided equitably.
- Transit services are adequate to provide access and mobility for all.
- Opportunities to participate in the transit planning and decision-making process are open and accessible.
- Sun Metro takes remedial and corrective actions to prevent discriminatory treatment of any beneficiary.

ABOUT SUN METRO

The vision of Sun Metro is to be your first choice in local mobility options and our mission is connecting our El Paso community through high quality transit services. To meet the population growth, Sun Metro offers fixed route and paratransit - Living Independently Facilitated by Transportation (LIFT) services within El Paso County.

Sun Metro recognizes that serving the public is our reason for existing and will strive to do whatever possible to assure our public a pleasant experience. Sun Metro also recognizes that our employees are our greatest resource in providing our services and that all our efforts to achieve success is dependent on the dedication, initiative and creativity of each individual in performing his/her job, and that our services improve as our efforts improve.

Therefore, it is the policy of Sun Metro, as established by the El Paso City Council to:

- 1. Be involved in the community and responsive to its transportation needs, implementing and planning for creative solutions whenever possible.
- 2. Pursue all revenue generating opportunities that benefit the transit system.
- 3. Encourage and reward employee participation in improving our public transit system.
- 4. Provide a productive and safe working environment that fosters initiative and creativity to the part of Sun Metro by rewarding individual achievement and performance.
- 5. Provide training and education that mutually supports the goals of Sun Metro and its employees.

The state of the s

Figure 1. Sun Metro System Map

ABOUT EL PASO

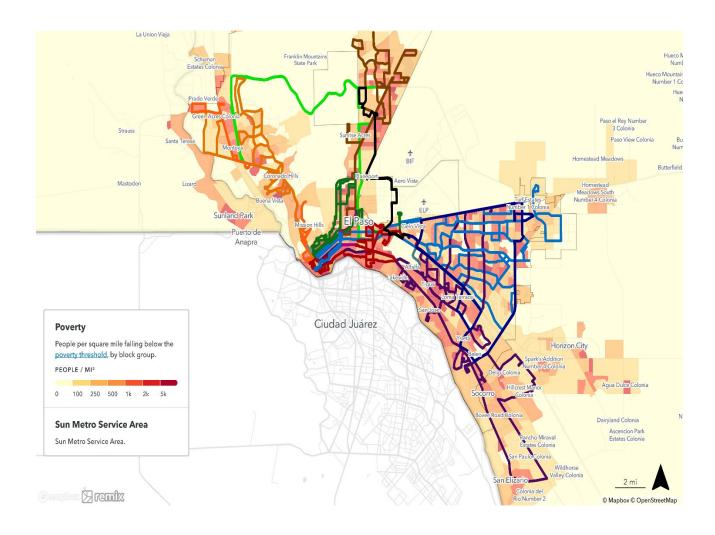
El Paso is located in the Far West corner of Texas, separated only by an international boundary line in the middle of the Rio Grande River from its sister city of Ciudad Juarez, Chihuahua, Mexico.

Together they form the El Paso/Juarez Metropolitan region that, with an estimated 2.5 million people, is the country's largest bi-national metropolis. As of July 1, 2015, El Paso is the sixth largest city in Texas, the population estimate from the U.S. Census was 678,415, making it the 24th most populous city proper in the United States (ahead of Boston and Atlanta).

El Paso is one of the poorer cities in the nation, with a per capita income that is only 70.2% of the national average, which meets the criteria of an Economically Distressed Area. The City's poverty rate of 18.8% far exceeds the 11.6% national rate. Communities with a higher percentage of households below poverty level are less likely to have access to reliable private transportation and therefore need alternate transportation.

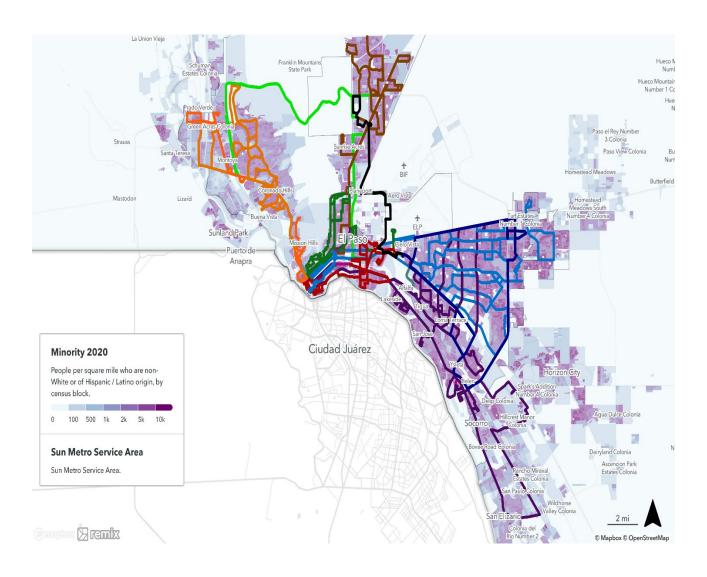
Please refer to map below.

SUN METRO SYSTEM MAP AND PERCENT OF POPULATION BELOW POVERTY LEVEL



El Paso has long been a majority-minority city where 82.9% of its residents claim Hispanic or Latino origin and 69.8% of those over the age of five years speak a language other than English at home. Please refer to map below.

SUN METRO SYSTEM MAP AND PERCENT OF MINORITY POPULATION



DEFINITIONS

Disparate Impact

Refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification, and where there exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate Burden

Refers to a neutral policy or practice that disproportionately affects low-income populations' more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Limited English Proficient (LEP) Persons

Refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Low-Income Person

Means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: "refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved" or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

Low-Income Population

Refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Minority

A person or passenger who identifies as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino (of any race), Native Hawaiian or Other Pacific Islander, or identifies as more than one race (multiracial) or some other race.

Predominantly Minority Area

Means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Sun Metro Low-Income Threshold

Sun Metro considers low-income a person that has indicated its family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)).

FARE STRUCTURE

The ase fare for Sun Metro fi ed route service is 1.50. Please refer to Ta le 1 for detailed fare structure changes for FY 2023.

Table 1. Sun Metro Fare Structure Changes

Sun Metro Transit Fare Type	FY 2022	FY 2023 Adopted
Reduced Fares		
Seniors 65 and older, Medicare recipients	0.30	0.50
Multi-Ride Passes		
Weekly Senior	2.50	3.50
Monthly Senior	10.00	15.00

In addition, refer to Table 2 below for overall Sun Metro fare structure:

Table 2. Sun Metro Fare Structure Schedule B

Sun Metro Transit Fare Type	Current Fares
Single Ride Passes	
Standard/Express Fare	1.50
Reduced Fares	
Active Military/Retired/Military Dependent	1.00
Student	1.00
Children 6-18	1.00
Children 5 & under	Free
Seniors 65 and older, Medicare recipients	0.50
LIFT fares	2.50
Fixed Route for LIFT passengers	Free
Transfer	Free
Multi-Ride Passes	
Daily	3.50
Daily Senior	3.50
Weekly	12.00
Weekly Military	7.00
Weekly Student	7.00
Weekly Senior	3.50
Monthly	48.00
Monthly Military	30.00
Monthly Student	30.00
Monthly Senior	15.00
Tokens	
Regular token (each)	1.50
Social Agencies bulk purchase token (each)	1.00

Student token (each)	1.00
Other	
City Employee, Job Corps, Jury Duty, etc.	Free

SUN METRO TITLE VI COMPLIANCE

In 2014, Sun Metro updated its Title VI Program, which received concurrence by the Federal Transit Administration (FTA) in September of 2015. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency's major service change, disparate impact, and disproportionate burden policies.

Disparate Impact Policy on Minority Populations

- **1.** Must analyze how the proposed action would impact minority as compared to non-minority populations.
- **2.** Determine if the adverse impacts of a major service change or fare adjustment is established over 25% based on the cumulative impact of the proposed service and/or fare changes.
- **3.** This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

Disproportionate Burden Policy

- **1.** Applies only to low-income populations that are not also minority populations.
- **2.** Determine if the adverse impacts of a major service change or fare adjustment is established over 25% based on the cumulative impact of the proposed service and/or fare changes.
- **3.** This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

FARE MEDIA

E isting fare media includes cash change cards to ens passes and transfers. Fare is paid on board at the vehicle's farebox for all routes except the BRT service.

Cash fare is paid upon oarding (or prior to oarding at a TVM along Brio Routes). A one way trip costs 1.50. Fare o es and TVMs accept 1 5 10 and 20 ills and U.S. currency coins. Fareboxes do not accept credit cards and do not return change. If a customer does not have exact change, the farebox will issue a change card for the difference.

Change cards can be used like cash on future rides but have no cash value outside of the Sun Metro system.

Tokens are redeemed at the farebox upon boarding. One token is good for one fare and two transfers.

Monthly, weekly, and day passes can be used on Sun Metro's fixed routes, Brio and the Streetcar.

Monthly Pass, Unlimited rides, good for one month beginning the day of validation (first use). Weekly Pass, Unlimited rides, good for one month beginning the day of validation (first use). Daily Pass, Unlimited rides, good for one month beginning the day of validation (first use).

Transfers

If you need more than one route to reach your destination, you can request a free transfer from the bus operator upon boarding the bus. Sun Metro's policies regarding transfers are as follows:

- Transfers must be requested upon boarding the bus.
- Transfers are good on the date issued for a one-time use within a 2-hour limit.
- Transfers must be given to the driver upon use.
- Transfers are valid only at designated transfer points.
- Transfers are not valid on the issuing route or any returning routes.

Transfers are both issued and accepted on all fixed routes, including BRT service on Brio Routes. If a trip begins on BRT, the ticket provided by the TVM can be used as proof of payment when boarding the next bus. If transferring from a regular bus to a BRT bus, a customer can re uest a transfer tic et on the first us ust as they would for a transfer to another fi ed route bus, and use that transfer ticket as proof of payment when boarding the BRT bus.

Points of Purchase

Farebox: Cash, change cards, passes (with the exception of monthly passes), and transfers are all processed at the farebox.



Ticket Offices process all tickets and passes except for daily passes. Purchases can be done using cash, change cards and credit cards. Sun Metro ticket offices locations:



Bert Williams Downtown Santa Fe Transit Center

601 Santa Fe | Boarding Map

6:00 a.m. to 6:00 p.m. Monday-Friday 8:00 a.m. to 4:00 p.m. Saturday



Arturo Tury Benavides Cielo Vista Transit Center

1165 Sunmount | Boarding Map

8:00 a.m. to 5:00 p.m. Monday-Friday



Robert E. McKee Five Points Transit Center 2830 Montana Ave. | Boarding Map 8:00 a.m. to 5:00 p.m. Monday-Friday



Glory Road Transit Center 100 E. Glory Road | Boarding Map



Nestor A. Valencia Mission Valley Transit Center

9065 Alameda | Boarding Map



Arves E. Jones, Sr. Transit Center at Northgate

9348 Dyer | Boarding Map

8:00 a.m. to 11:30 a.m. | 12:00 p.m. to 4:30 p.m. Monday-Friday



Al Jefferson Westside Transit Center 7535 Remcon | Boarding Map

Ticket Vending Machines (TVMs) process all tickets and passes. Purchases can be done using cash, change cards and credit cards. Sun Metro ticket vending machines are located at the terminals pictured above.

Ticket vending machines can also be found along our Alameda, Dyer, and Mesa Brio Routes. Montana Brio will become operational in late 2022.



FARE EQUITY ANALYSIS

At its core, a fare equity analysis demonstrates that a transit agency has considered the consequences of a proposed policy that is facially neutral but may result in a disparate impact on minority riders or a disproportionate—urden for low income riders. The FTA s suggested methodology for performing a fare equity analysis begins with determining the number and percent of users of each fare media and evaluating the differences between minority users and non minority users and low—income and non low income users. Ne t—the analysis should evaluate the impacts of the proposed changes to determine if there is a disparate impact or disproportionate burden. Finally, alternatives must be evaluated and mitigation strategies offered to prevent or mitigate any potential burden.

Whereas either population (from the U.S. Census) or ridership data can be used for a service equity analysis, the FTA recommends using ridership survey data for fare equity analyses. The ridership or customer survey data helps an agency determine if minority and or low income riders are disproportionately more likely to use the fare media that would be subject to change than the general population (see FTA C 4702.1B V 19).

Sun Metro's proposed changes will not immediately affect the price or availability of existing fare media. The proposed change is to add a mobile ticketing option fare media.

Thus, the focus of this fare equity analysis is to answer two key questions:

- 1. Does the change in fare structure create a disparate impact or disproportionate burden?
- 2. Does the change in Streetcar service create a disparate impact or disproportionate burden?

DATA SOURCES

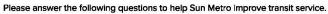
To determine the impact of introducing new fares, data from the 2022 Onboard Sun Metro Riders' Survey were used to perform the Title VI analysis. The following questions from the survey will be analyzed for the fare equity analysis:

Figure 2. 2022 Onboard Sun Metro Riders Survey

RIDER SURVEY

□, Yes

□₂ No



C		201	ra.
9	ULL	net	

1.	Which Sun Metro route are you on now?	14.		mployed, do yo	u usually wo	rk o	n weekei	nds? <i>Select</i>	all that	
	□, Brio Mesa □ ₄ Other route		apı							
	D ₂ Brio Alameda (Which route #?		ш,	Yes, Saturday	□, Yes, Sunda	y	Ll ₂ No	, do not work	weekends	
	□ ₃ Brio Dyer	15.	Are	you a student?						
2.	During this trip, did you or will you transfer between	ween routes?	Π,	No			Yes, Midd	le School		
	□, Yes (which route(s) #?:) □₂ No			Yes, College/Unive	ersity		Yes, Elem	entary School		
3.	During this trip, did you or will you transfer at a	transit center?		Yes, High School			Other:			
	Yes (specify which transit center below) □, No		Ho	w old are you?						
	□, Downtown □, Cielo Vista	17.	Wh	at is your gende	er?					
	□, Westside □, Five Points	222		Male	****	Π.	Prefer to	self-describe:		
	□ ₃ Mission Valley □ ₆ Northgate			Female		-3			<u>.</u> ,	
4.	Where do you live?	18.	Whi	ich of the follow	ring describe	vou	? Select	all that app	ly.	
	□, El Paso □ ₃ Other:			Hispanic/Latino	050	970		waiian Pacific	=	
	□ ₂ Cuidad Juarez			White				stern/North Af		
_				Asian		ο,	American	Indian/Alaska	Native	
5.	What is your home ZIP Code?		\square_4	Black/African Ame	rican		Other:			
6.	Where are you currently traveling to?	19.	Inc	luding yourself,	how many p	еор	le live in	your housel	hold?	
	□, Home □, Medical appoi	intment	100		20.00					
	□ ₂ Work □ ₅ School/college	e 20.	Ho	w many vehicle	s are availab	le in	your ho	usehold?		
	□ ₃ Shopping □ ₆ Entertainment	t/Recreation 21.	Wha	at is your total a	nnual house	holo	l income	?		
	🗆, Other (please specify):			Under \$10,000				to \$74,999		
7.	How many days in a typical week do you ride Si	un Metro?		\$10,000 to \$24,99	19	-	100-10-0-10-0-10-0-1	to \$99,999		
	□, Less than once a week □, 3 to 4 days			\$25,000 to \$49,9	99		\$100,000	or more		
	□ 1 to 2 days □ 5 to 6 days	22	Wha	at language(s) d	o vou eneak	at h	ome? Se	lect all that	annly	
0	For how long have you used Sun Metro?				l, Spanish		Other:	icci on mot	арріў.	
Q.	□, Less than 6 months □, 2 to 5 years					-	odici			
	\square_1 Less than 6 months \square_2 6 months to 1 year \square_5 5 or more year	23.	Ho	w well do you s						
	□, 1 to 2 years	·· ··	ο,	Very well E	3 ₂ Somewhat v	/ell	□ ₃ Not v	□ ₃ Not well at all		
9.	If Com Mater over not evallable here overally seen	24.	Do	you have a sma	rtphone?					
Э.	If Sun Metro was not available, how would you this trip?	nave made	Π,	Yes E	I ₂ No		I'm not su	ire		
	□, Walk □, Lyft or Uber	25	Do	you use mobile	nav?					
	□, Bike □, Taxi	23.			J, No	п	I'm not su	ıro		
	🗖 Drive 📮 Other:				2 4000	•				
	□ ₄ Get a ride □ ₈ I wouldn't hav	re made this trip 26.		w satisfied are y				ects of Sun	Metro	
10.	Which fare category applies to you?		ser	vice? Please ch	eck tne appr	орп	ate pax.			
	□, Adult □, Child (ages 6-	18)			Satisfied		Neutral	Not satisfied	No Opinion	
	□, Student fare □, Senior		quen	cy of BRIO service		T				
	☐ Disability ☐ Military	Fre	quen	cy of regular service		T				
44	Which fare product did you use for this trip?	Ho	urs of	f service						
11.	NOS 200 W 10 00	Bu	ses ru	ınning on time		T				
	□, Single ride □, Weekly Pass □, Day Pass □, Monthly Pass	Tra	nsit c	enters						
	□ ₂ bay ress □ ₅ monthly ress □ ₇ Transfer	BR	IO sta	itions						
40		Re	gular	bus stops						
12.	Are you currently employed?	Far	res							
	□, Yes, full-time □ ₃ No, not currer	ntiy employed Sar	fety o	n buses						
	\square_2 Yes, part-time \square_4 No, retired	_	fety a	t transit stops		1				
13.	If employed, on a typical workday, do you usual	lly work past Dri	ver co	ourtesy						

THANK YOU FOR RIDING SUN METRO!

ENCUESTA DE PASAJEROS

13. Si está empleado/a, en un día de trabajo típico, ¿suele trabajar más

□₂ No

allá de las 9:00 p.m.?

o, sí



Responda las siguientes preguntas para ayudar a Sun Metro a mejorar el tránsito servicio.

ICJ	portau las siguientes preguntas para ayadar a can me	are a mejorar er aanske servicio.
1.	¿En qué ruta de Sun Metro se encuentra ahora?	14. Si está empleado/a, en un día de trabajo típico, ¿suele trabajar los
	□, Brio Mesa □₄ Otra ruta	fines de semana?
	□₂ Bro Alameda (¿que ruta?	\square , Sí, en sábado \square , Sí, en domingo \square No trabajo los fines de semana
	□ ₃ Brio Dyer	15. ¿Es usted estudiante?
2.	Durante este viaje, ¿has hecho o vas a hacer un tra	nsbordo 🗆, No 🖂 Sí, Escuela secundaria
- 0	entre rutas?	\square_2 Sí, Colegio/Universidad \square_5 Sí, Escuela primaria
	□, Sí (¿que ruta(s)?	□ ₃ Sí, Preparatoria □ ₆ Otra:
	Durante este viaje, ¿hizo o hará un transbordo en u	16. ¿Cual es su edad?
3.	de tránsito (transit center en inglés)?	17. ¿Cuál es su género?
	Sí (especifique cual(es) centro(s) de tránsito) \square_7 No	\square_1 Masculino \square_3 Prefiero autodescribirme:
	□, Downtown □ Cielo Vista	□ ₂ Femenino
	\square_2 Westside \square_5 Five Points \square_3 Mission Valley \square_6 Northgate	 ¿Cuál de los siguientes te describe? Seleccione todas las respuestas que apliquen.
_		☐, Hispano(a)/latino(a) ☐, Nativo(a) de Hawaii o de otra de las islas del Pacífico
4.	¿Dónde vive?	□₂ Blanco(a) □₂ Del Medio Oriente o del Norte de África
	□, El Paso □ ₃ Otra:	Asiático(a) 🔲 Indígena de las Américas o nativo(a) de Alaska
	💶 Cuidad Juarez	□4 Negro(a) o afroamericano(a) □8 Otra:
5.	¿Cuál es el código postal de su domicilio?	19. Incluido/a usted mismo/a, ¿cuántas personas viven en su hogar?
6.	¿Adónde está viajando?	20. ¿Cuántos vehículos están disponibles en su hogar?
	□, Mi hogar □, Cita médica	21. ¿Cuál es su ingreso familiar anual total?
	□₂ Trabajo □₅ Escuela/universida	G Monor do \$10,000
	□ ₃ Ir de compras □ ₆ Entretenimiento/Re	□ ₂ \$10,000 a \$24,999 □ ₅ \$75,000 a \$99,999
	• Volume Con	П ₃ \$25,000 a \$49,999 П ₆ \$100,000 o más
7.	¿Cuántos días de una semana típica utiliza Sun Metro?	22. ¿Qué idioma(s) habla en su hogar? Seleccione todas las respuestas
	\square , Menos que una vez a la semana \square ₃ 3 a 4 días	que apliquen.
	\square_2 1 a 2 días \square_4 5 a 6 días	□, Inglés □₂ Español □₃ Otra:
8.	¿Desde cuándo utiliza Sun Metro?	23. ¿Qué tan bien habla usted el inglés?
	□, Menos de seis meses □, De 2 a 5 años	□, Muy bien □, Algo bien □, Nada bien
	$\square_{_2}$ De 6 meses a 1 año $\square_{_5}$ 5 o más años	24. ¿Tienes un teléfono inteligente?
	□ ₃ 1 a 2 años	2011 PARTS N. D. SHEET PARTS N. D. SHEET N
9.	Si Sun Metro no estuviera disponible, ¿cómo habría	□, Sí □₂ No □₃ No estoy seguro/a hecho
	este viaje?	25. ¿Utilizas pagos por móvil?
	□, Caminando □ ₅ Lyft o Uber	\square_1 Sí \square_2 No \square_3 No estoy seguro/a
	$\square_{_{2}}$ En bicicleta $\square_{_{6}}$ Taxi	26. ¿En qué medida está usted satisfecho/a con los siguientes
	□ ₃ Conduciendo un vehículo □ ₇ Otra:	aspectos del servicio de Sun Metro? Marque la casilla apropiada.
	□ ₄ Consiguiendo un viaje □ ₈ No habría hecho e	Setisfecho/a Neutral No Sin opinión
10.	¿Qué categoría de tarifa le corresponde?	Frecuencia del servicio BRIO
	□, Adulto □, Niño/a (6-18 años)	Frecuencia del servicio regular
	$\square_{\rm z}$ Tarifa de estudiante $\square_{\rm s}$ Adulto mayor	Horas de servicio
	□ ₃ Discapacidad □ ₆ Militar	Los autobuses funcionan a tiempo
11.	¿Qué tipo de pasaje utilizó para este viaje?	Centro de tránsito
	□, Viaje sencillo □, Pase semanal	Estaciónes de BRIO
	\square_{2} Pase diario \square_{5} Pase mensual	Paradas de autobús regulares
	□ ₃ Transbordo	Tarifas
12.	¿Está usted actualmente empleado/a?	Seguridad en los autobuses
	□, Sí, a tiempo completo □, No, no tengo empleo actu	10000 - 10000 0000 0000 0000 0000 0000
	\Box_2 Sí, a tiempo parcial \Box_4 No, jubilado/a	Segundad en los centros de transito Cortesía de los conductores
	The state of the s	Contesia de los conductores

IGRACIAS POR VIAJAR EN SUN METRO!

METHODOLOGY:

Step 1: Classify Survey Responses by Minority or Low-Income Status

All respondents who indicated a race ethnicity other than Non ispanic White Caucasian were considered a minority for purposes of this analysis. If a respondent indicated more than one race/ethnicity, they were considered a minority. Furthermore, if a respondent indicated "other," they were considered a minority. Records where the respondent did not answer the race/ethnicity question were excluded from the disparate impact analysis, as their minority status could not be determined.

Sun Metro s definition of low income is any person whose median household income is at or below 150 percent of the federal poverty line. The federal poverty guidelines issued by the U.S. Department of Health and Human Services were used as the asis for determining low income status. See Table 2.

Utilizing the survey questions related to household income and number of persons per household each survey respondent was coded as low income (elow 150 percent of the poverty line) or non low income (a ove 150 percent of the poverty line) according to Ta le 3.

If the respondents did not answer the race/ethnicity question but did answer the questions related to household size and income, they were still included in the disproportionate burden analysis. The FTA directs recipients to analyze disparate impact and disproportionate burden separately.

Table 3. 2022 Poverty Guidelines for the 48 Contiguous States and D.C.

Number of Persons in Household	Annual Hous	Annual Household Income		
	100%	150%		
1	13 590	20 385		
2	18 310	27 465		
3	23 030	34 545		
4	27 750	41 625		
5	32 470	48 705		
6	37 190	55 785		
7	41 910	62 865		
8	46 630	69 945		
For families households with more than 8 pers	sons add 5 430 for each	5 430 for each additional person.		

Table 4. ow ncome Status y 2022 Sun Metro Onboard Riders' Survey Categories (Below or Above 150% of Federal Poverty Guideline)

Number of	Number of Households with	Number of Households with
Persons in	Income Above 150% Threshold	Income Below 150% Threshold
Household		250
1	55	359
2	93	423
3	51	459
4	14	480
5	10	571
Grand Total	223	2292

Step 2: Determine Minority and Low-Income Share of Fare Media Options

During a fare equity analysis, an agency must evaluate the minority and low income usage of the affected fare media. In other words, if Sun Metro were to eliminate cash and survey data indicated minority riders were more li ely to use cash than non minority riders (y more than 25 percent), it could trigger a potential disparate impact if accommodations were not made. Similarly, if Sun Metro were to eliminate cash and survey data indicated low-income riders were more li ely to use cash than non low-income riders (by more than 25 percent), it could trigger a potential disproportionate burden if accommodations were not made. Since Sun Metro is not removing any existing fare media, there is no immediate burden. However, Sun Metro is completing this analysis to remain FTA compliant and ensure any future benefits of the mobile pay option are not disproportionately distributed, and does not create a disparate impact/disproportionate burden.

The analysis of fare media was performed using the 2022 Onboard Sun Metro Riders' Survey. According to the survey data, as shown in Table 5, about 95 percent of surveyed Sun Metro riders who answered both the income and fare media questions were considered low income. The largest discrepancy was still well below the 25 percent threshold, with a difference between e pected and actual low income of 5 percentage points.

The "burden" shown in Table 5 indicates changing or eliminating each fare media option has a greater impact on minorities (positive num er) or non minorities (negative num er). This is calculated by taking the difference between the expected low-income rider share of each fare media option (95 percent) and the actual low-income share of fare media. None of these burdens exceeded (or even neared) Sun Metro's 25 percent threshold. The FTA methodology refers to percentage points simply as percentages, so a 25 percent threshold is interpreted as 25 percentage points in practice. See example provided in FTA C 4702.1B V 13.

Table 5. Fare Media Usage by Low-Income Status, 2022

Fare Type	Low-Income Passengers	Low Income Percent	Non-Low- Income Passengers	Non- Low- Income Percent	Total Number of Passengers	Disproportionate Burden Based on Income
Adult Standard/Express Fare	1,415.00	90%	163.00	12%	1,578	-5 percentage points
Children Fare (age 6 -8)	78.00	100%	0.00	0%	78	5 percentage points
Children under 5	97.00	100%	0.00	0%	97	5 percentage points
City Employees	1.00	100%	0.00	0%	1	5 percentage points
Day Pass	364.00	95%	20.00	5%	384	0 percentage points
Military Fare	14.00	88%	2.00	14%	16	-7 percentage points
Senior/Disability Reduced Fare	471.00	97%	13.00	3%	484	2 percentage points
Student Fare	656.00	99%	4.00	1%	660	4 percentage points
Transfer	1,223.00	100%	2.00	0%	1,225	5 percentage points
Grand Total	4,319.00	95%	204.00	5%	4,523	

According to the survey data, as shown in Table 6, about 95 percent of surveyed Sun Metro riders who answered both the fare media question and the race/ethnicity question reported a race other than Non ispanic White. Thus the e pected share of minority riders using each fare media option is 95 percent. The largest discrepancy was still well below the 25 percent threshold, with a difference between expected and actual minority of 11 percentage points.

Table 6. Fare Media Usage by Minority Status, 2022

Fare Type	Minority	Minority	Non-	Non-	Total	Disproportionate
Ture Type	Passengers	Percent	Minority	Minority	Number of	Burden Based on
)		Passengers	Percent	Passengers	Income
Adult						
Standard/Express						
Fare	1,415.00	90%	163.00	12%	1,578	-3 percentage points
Children Fare (age 6						
-8)	78.00	100%	0.00	0%	78	11 percentage points
Children under 5						
	97.00	100%	0.00	0%	97	11 percentage points
City Employees						
	1.00	100%	0.00	0%	1	11 percentage points
Day Pass						
	364.00	95%	20.00	5%	384	-6 percentage points
Military Fare						
	14.00	88%	2.00	14%	16	-1 percentage points
Senior/Disability						
Reduced Fare	471.00	97%	13.00	3%	484	8 percentage points
Student Fare						
	656.00	99%	4.00	1%	660	10 percentage points
Transfer						
	1,223.00	100%	2.00	0%	1,225	-8 percentage points
Grand Total						
	4,319.00	95%	204.00	5%	4,523	

Public Participation and Outreach

Sun Metro conducted public outreach during the first week of May 2022 to solicit customer feedback on the fare structure and service changes.

A total of 2,679 riders responded to the survey with an average completion percentage of 90%. The survey questions will not only assist with the preparation of this Fare Equity Analysis but the information obtained will be used to help plan future improvements to the bus system in the City of El Paso. For example, the results of this study may be used to help decide what new routes to develop and to help plan changes to existing routes. These improvements could make bus service accessible to more people in more parts of the metropolitan area.

The primary goal for the outreach was to engage and gather feedback from Sun Metro riders on their experience utilizing public transit service and their demographics. To accomplish this goal, Sun Metro focused efforts on reaching as many riders as possible.

Sun metro reached out to disadvantaged populations and made sure that Sun Metro's Limited English Proficiency (LEP) needs were met. The map on the following page shows the distribution of survey respondents by zip code.

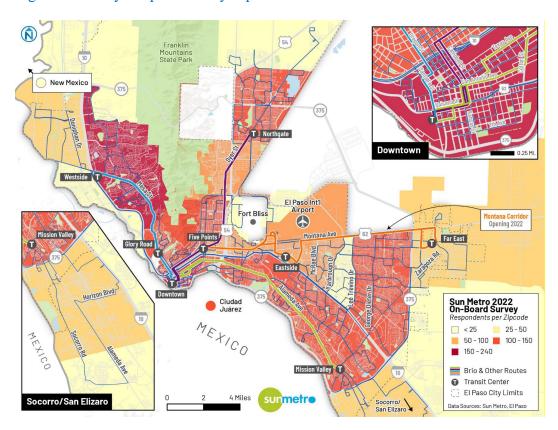


Figure 3. Survey Respondents by Zip Code

Sun Metro Discounted Fares Advertisement

Date	Mode of Outreach	Outreach Details
Sept 1, 2022	News Release	News release on adjustment to discounted fares released.
Sept 1, 2022	Website	News release on adjustment to discounted fares is posted on Sun Metro website.
Sept 9, 2022 –	Outreach Team	Outreach Team distributes discounted fares handouts at
Oct 2022	Mobilization	transit centers.



MAYOR Oscar Leeser CITY MANAGER

Tommy Gonzalez

CITY COUNCIL

District 1 Peter Svarzbein

District 2 Alexsandra Annello District 3 District 5
Cassandra Hernandez Isabel Salcido

District 4 District 6

Joe Molinar Claudia L. Rodriguez

5 District 7
Falcido Henry Rivera

District 8 Cissy Lizarraga



Sun Metro Adjusting Discounted Fares

09/01/2022

Standard Bus Fare of \$1.50 Will Remain Unchanged

EL PASO, Texas — Effective October 1, 2022, a discounted fare offered by Sun Metro will increase by 20 cents for the first time in more than 25 years.

The new discounted bus fare for seniors and people with disabilities will be 50 cents. The standard bus fare is \$1.50, and it will remain unchanged.

The new 50-cent fare will also apply to LIFT customers if they choose to ride Sun Metro's Fixed Route. Previously, there was no charge to LIFT customers for riding the Fixed Route service. LIFT fare for LIFT service will remain at \$2.50 per trip.

A 30-day grace period will be implemented to allow Sun Metro to inform riders about the fare modification for the senior and disabled discount. The fare modification is part of Sun Metro's Strategic Recovery Plan.

"Sun Metro hasn't modified its discounted fares for seniors and people with disabilities in more than two decades. This means reduced fares have not been keeping pace with rising operational costs, which has hindered public transit service. This fare modification, while an increase, remains substantially lower than our standard fare, which will allow Sun Metro to protect our most vulnerable populations while also working to address the public transit service demands," said Ellen Smyth, City of El Paso Chief Transit Operations Officer.

Sun Metro customers may visit www.SunMetro.net or call the Customer Service Center at (915) 212-3333 during regular business hours to learn more.



Sun Metro will be modifying our discounted fare for seniors and people with disabilities starting October 1, 2022. The new fares will be 50 cents. The standard bus fare of \$1.50 will remain unchanged. The fare will apply to LIFT customers who ride Fixed Route. LIFT Service fare of \$2.50 will remain unchanged. For more information, visit www.SunMetro.net or call (915) 212-3333 during regular business hours.

#SunMetro #EIPasoTexas #EPTX #IAmEIPaso City of El Paso, Texas - Municipal Government



EL PASO STREETCAR

On November 9, 2018, the El Paso Streetcar began service. The El Paso Streetcar route highlights all the wonderful things that make El Paso downtown and uptown a unique place to visit. The 4.8 mile-route runs in two loops through El Paso's uptown and downtown areas. Both loops interconnect through a single-tracked corridor an international bridge, an array of businesses, restaurants, government buildings, convention center, downtown ballpark, and the University of Texas at El Paso among many other prominent locations. As part of this project, six vintage streetcars (the same vehicles that ran on El Paso streets until 1974) were restoration for the rigors of daily service. While the cars are decades old, they are be outfitted with modern amenities including:

- Seating for approximately 35 people and additional space for standing riders
- Free Wi-Fi
- ADA accessibility
- Bike racks
- Air conditioning
- Heating
- Upgrades for safety
- Modern propulsion
- Streetcar branding along the route and signage at designated stops
- Pavement, sidewalk and driveway improvements at designated stops





The average yearly cost to operate the streetcar is 2.5 M with an average of 250 operated service days, 205,765 unlinked passenger trips and 318,685 passenger miles traveled.

Service Hours & Fare

The El Paso Streetcar has recently increased its hours of operation and service days to the following:

- Wednesday Saturday: 3:00 p.m. to 10:00 p.m.
- Sunday: 12:00 p.m. to 6:00 p.m.

The El Paso Streetcar continues to be free for all riders.



MAYOR Oscar Leeser

CITY MANAGER Tommy Gonzalez

CITY COUNCIL

District 1 Peter Svarzbein

District 2 Alexsandra Annello District 3 Cassandra Hernandez Isabel Salcido

District 4 Joe Molinar District 5

District 6

Henry Rivera

District 8 Claudia L. Rodriguez Cissy Lizarraga

District 7



08/12/2022

El Paso Streetcar Expands Service Hours Beginning August 31, 2022

EL PASO, Texas — El Paso Streetcar will be increasing its hours of operation and days beginning August 31, 2022.

Under the new extended service schedule, the Streetcar will run Wednesday through Sunday as follows:

- 3 p.m. to 10 p.m. Wednesday through Saturday
- Noon to 6 p.m. Sunday

"Downtown plays a significant role in our city and international region and by expanding the Streetcar service hours we are able to support Downtown's economic, social, and cultural vitality, while also connecting our uptown and Downtown neighborhoods via public transit," said Ellen Smyth, City of El Paso Chief Transit and Field Operations Officer. "Like many of the improvements seen throughout our community, we are also seeing positive progress in our Downtown area made possible through public and private investment and Sun Metro is proud to support the growth.

Passengers may track the streetcar with the free Ride Sun Metro App.



Now offering NEW Extended Service hours! Today marks the first day of the El Paso Streetcar's new schedule. We are excited to now operate Wednesday-Sunday. Plan ahead and track the Streetcar today by using the free Ride Sun Metro app.

New Schedule: Wed. – Sat. | 3 pm – 10 pm Sunday | 12 pm – 6 pm ... See more



Figure 4. El Paso Streetcar Route

TO

TO

TO

TO

TO

TO

TO

STREETCAR
STOP

TEANSE

TO

TEAN
TEAN
TO

TEAN
TEAN
TO

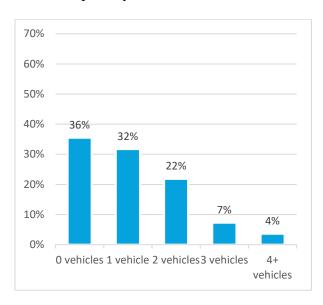
T

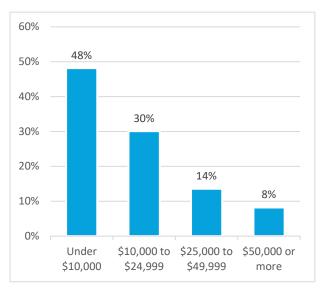
ONBOARD SUN METRO RIDER'S SURVEY MAJOR FINDINGS

The information obtained will be used to help plan future improvements to the bus system in the City of El Paso. For example, the results of this study may be used to help decide what new routes to develop and to help plan changes to existing routes. These improvements could make bus service accessible to more people in more parts of the metropolitan area.

Number of Vehicles in the Household & Household Income

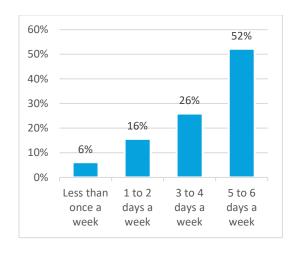
According to the survey results, 36% of Sun Metro riders do not own a vehicle and 48% live below the poverty level.

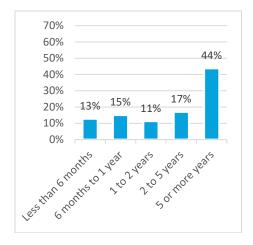




Sun Metro Usage & Rider Tenure

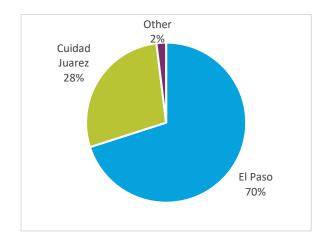
About 52% of individuals surveyed said they use Sun Metro's transit service about 5-6 days a week and 44% are long-time riders.

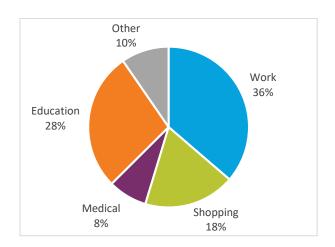




Rider Origins & Destinations

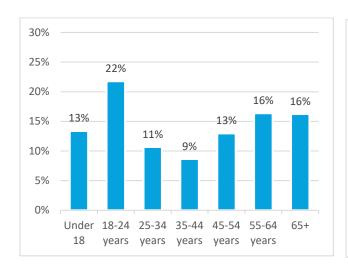
A majority (70%) of Sun Metro riders live in El Paso, while one-quarter (28%) live in Ciudad Juarez. The highest percentage (36%) of individuals use Sun Metro transit service to commute to work.

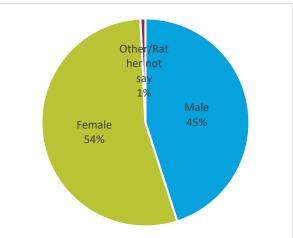




Rider Age & Gender

A majority of riders (22%) are between the age of 18-24 and are female (54%).





CONCLUSION

The FTA requires Sun Metro to adopt Title VI Equity Analysis Policies. This includes a Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy. The purpose of conduction service and fare equity analysis prior to implementing service and/or fare changes is to determine whether the planned changes will have a disparate impact on the basis of race, color, national origin or income.

The discounted fare change aligns with Sun Metro's Title VI policies and procedures and does not pose a disproportionate burden nor disparate impact on the community.

The El Paso Streetcar is free and open to all Sun Metro riders and the community in general; therefore, there were no discrepancies that exceeded the 25 percent disproportionate burden threshold nor the 25 percent disparate impact threshold.



SPECIAL MASS TRANSIT DEPARTMENT BOARD MINUTES CITY COUNCIL CHAMBERS January 18, 2023

A special meeting of the Mass Transit Department Board was called to order at 10:52 a.m. Chair Oscar Leeser was present and presiding and the following Board Members answered roll call: Board Members Brian Kennedy, Alexsandra Annello, Cassandra Hernandez, Joe Molinar, Isabel Salcido, Art Fierro, and Henry Rivera. Board Member Chris Canales requested to be excused from this meeting.

CALL TO THE PUBLIC – PUBLIC COMMENT

This time is reserved for members of the public who would like to address the Mass Transit Department Board on items that are not on the Mass Transit Department Board Agenda.

No members of the public commented.

CONSENT AGENDA

*Motion made by Board Member Molinar, seconded by Board Member Kennedy, and unanimously carried to **APPROVE, AS AMENDED**, all matters listed under the Consent Agenda unless otherwise noted (Items approved, postponed, or deleted pursuant to the vote on the Consent Agenda will be shown with an asterisk.)

AYES: Board Members Kennedy, Hernandez, Molinar, Salcido, Fierro, Rivera and Board Chair

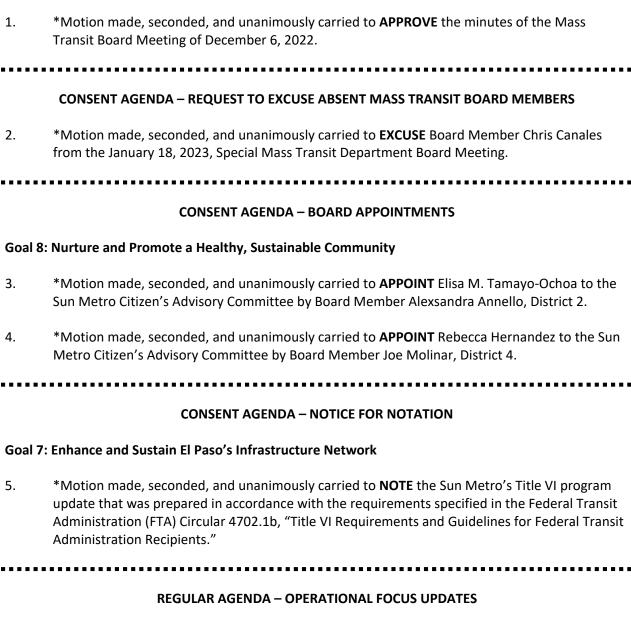
Leeser

NAYS: None

NOT PRESENT: Board Member Annello ABSENT: Board Member Canales

CONSENT AGENDA – APPROVAL OF MINUTES

Goal 6: Set the Standard for Sound Governance and Fiscal Management



6. Presentation and discussion on the Fixed Route Performance Indicators for the First Quarter of FY23 period ending November 30, 2022.

Ms. Ellen Smyth, Chief Transit and Field Operations Officer, gave a PowerPoint presentation and commented.

Board Members Fierro and Hernandez commented.

Goal 7: Enhance and Sustain El Paso's Infrastructure Network

NO ACTION was taken on this item.

7. Presentation and discussion on the Paratransit/LIFT Performance Indicators for the First Quarter of FY23 period ending November 30, 2022.

Ms. Ellen Smyth, Chief Transit and Field Operations Officer, gave a PowerPoint presentation and commented.

Board Members Annello, Hernandez, and Fierro commented.

NO ACTION was taken on this item.

8. Management Update – Sun Metro Project Update presentation from Nelson Nygaard.

Ms. Ellen Smyth, Chief Transit and Field Operations Officer presented James Gamez, principal with Nelson Nygaard, who gave a PowerPoint presentation and commented.

Board Members Annello and Hernandez commented.

City Manager Tommy Gonzalez commented.

Chief Financial Officer Robert Cortinas commented.

Ms. Smyth commented.

NO ACTION was taken on this item.

ADJOURN

Motion made by Board Member Rivera, seconded by Board Member Molinar, and unanimously carried to **ADJOURN** the meeting at 11:46 a.m.

AYES: Board Members Kennedy, Annello, Hernandez, Molinar, Salcido, Fierro, Rivera, and Board

Chair Leeser

NAYS: None

ABSENT: Board Member Canales

Approved as to content:

Ellen A. Smyth, Chief Transit & Field Operations Officer