

# 2025 Title VI Program Update



October 1, 2025  
10151 Montana Ave.  
El Paso, Texas 79925  
(915) 212-3300  
[sunmetro.net](http://sunmetro.net)



# Table of Contents

<b>Sun Metro’s Profile</b> .....	1
<b>General Requirements</b> .....	4
1. Notification to Beneficiaries of Title VI Protections.....	4
2. Title VI Complaint Procedure and Complaint Form.....	7
3. Record of Title VI Investigations, Complaints or Lawsuits .....	11
4. Sun Metro’s Public Participation Plan.....	13
5. Improving Access for People with Limited English Proficiency .....	14
6. Minority Representation on Planning and Advisory Bodies .....	21
7. Subrecipient Compliance and Monitoring.....	22
<b>Requirements for Fixed Route Transit Providers</b> .....	22
1. System-wide Standards and Policies .....	22
2. Collect and Report Demographic Data .....	32
3. Monitoring of Service Standards .....	42
4. Evaluate Service and Fare Changes .....	53
<b>Grants, Reviews, and Certifications</b> .....	59
<b>Contact</b> .....	61
<b>Appendix</b> .....	62

## Sun Metro's Profile

The City of El Paso's Mass Transit Department, Sun Metro, provides public transportation services for more than 5 million passengers a year within its 258 square-mile service area. SM's services include fixed route, rapid transit, paratransit, and streetcar. As a border city, El Paso is the largest bi-national metropolitan area in the world. Respectively, SM's service is unique among the nation's transportation agencies.

### [Sun Metro's Mission Statement](#)

Sun Metro's mission is to connect our El Paso community through high quality transit services.

### [Sun Metro's Title VI Report Purpose](#)

The purpose of the Title VI Program Update is to document the steps Sun Metro has taken and will take to ensure that Sun Metro provides services without excluding or discriminating against individuals on the basis of race, color, and national origin. Additionally, Sun Metro will take steps to ensure that our programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

## Contact Information:

Jerry DeMuro  
Deputy Transit Officer  
City of El Paso, Sun Metro  
(915) 212-3470  
[DeMuroG@elpasotexas.gov](mailto:DeMuroG@elpasotexas.gov)

# 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 6, 2026.**

# General Requirements

This section addresses the General Requirements as described under Chapter III of FTA Circular 4702.1B.

## 1. Notification to Beneficiaries of Title VI Protections

Sun Metro is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. Notice regarding Sun Metro's Civil Rights Policy has been disseminated throughout the bus system in both English and Spanish. The materials include posters displayed at transit terminals and digital notifications on buses, and on Sun Metro's website at <https://sunmetro.net/about/title-vi-and-dbe/>. Sun Metro's Title VI Policy and Civil Rights Notice (**Figure 1 & 2**), including cases (**Figure 3**) are posted at the following locations:

- Al Jefferson Westside Transit Center, 7535 Remcon Circle
- Glory Road Transit Center, 100 E. Glory Rd.
- Union Plaza Transit Terminal, 400 W. San Antonio
- Robert E. McKee Five Points Transit Center, 2830 Montana
- Bert Williams Downtown Santa Fe Transit Center, 301 S. Santa Fe
- Arves E. Jones Sr. Transit Center at Northgate, 9348 Dyer
- Arturo Tury Benavides Eastside Transit Center, 1165 Sunmount
- Upper East Side Transit Center, 12781 Edgemere Blvd
- Nestor A. Valencia Mission Valley Transit Center, 9065 Alameda

In addition, the Title VI Civil Rights Notice is publicized on all fleet vehicles, either displayed on a screen or a poster (**Figure 4**).

**Figure 1: Discrimination Complaints Process Public Notice**

### HOW TO FILE A DISCRIMINATION COMPLAINT

If you think that The City of El Paso – Sun Metro has failed to provide these services or discriminated in another way based on race, color, national origin (including language), disability, sex, age, or religion, you can file a complaint in person or by mail with:

Sun Metro  
Attn: Customer Service - Nondiscrimination  
10151 Montana Ave.  
El Paso, TX 79925

If you wish to file by e-mail, please call (915) 212-3333 and an appropriate e-mail address will be provided.

**You can also file a civil rights complaint with the Federal Transit Administration (FTA) Office of Civil Rights:**

U.S. Mail:  
Federal Transit Administration Office of Civil Rights  
Attn: Complaint Team East Building, 5th Floor – TCR  
1200 New Jersey Ave., SE Washington, D.C. 20590

E-mail: [FTA@CivilRightsCommunications@dot.gov](mailto:FTA@CivilRightsCommunications@dot.gov) Phone: 1-888-444-4511  
(with "FTA complaint form" in the subject line)

#### NOTICE AND FREQUENTLY ASKED QUESTIONS (FAQ) ABOUT REASONABLE ACCOMMODATIONS FOR INDIVIDUALS WITH DISABILITIES

**NOTICE:** The City of El Paso – Sun Metro is committed to providing individuals with disabilities an equal opportunity to participate in and benefit from Sun Metro's programs, activities, and services.

Individuals may request reasonable accommodations from Sun Metro that they believe will enable them to have such equal opportunity to participate in our programs, activities, and services.

To request reasonable accommodations, please contact Sun Metro Customer Service at (915) 212-3333, or by using the "Contact Sun Metro" link of our website: [www.sunmetro.net](http://www.sunmetro.net). This Reasonable Accommodations Notice can be found at all Sun Metro transit centers.

**FREQUENTLY ASKED QUESTIONS (FAQ):** The following FAQ provides information on requesting reasonable accommodations in Sun Metro's programs and activities.

1. What is a reasonable accommodation in Sun Metro's programs? A change or modification to afford a qualified individual with a disability full enjoyment of Sun Metro's programs or activities, unless modification of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial and administrative burden to Sun Metro.
2. How do I request a reasonable accommodation? If you need a reasonable accommodation, please contact Sun Metro Customer Service at (915) 212-3333, or by using the "Contact Sun Metro" link at our website [www.sunmetro.net](http://www.sunmetro.net).
3. Does my request for a reasonable accommodation need to be in writing? No, you do not need to put your request in writing; however, making a written request can be helpful documentation for ensuring that Sun Metro provides the desired accommodation. In addition, you do not need to use the specific words "reasonable accommodation" when making your request.
4. When should I request a reasonable accommodation? You may request a reasonable accommodation from Sun Metro at any time. However, making the request in advance of a meeting, conference, call, or visit will help ensure that Sun Metro is able to fulfill the request for an accommodation. For certain requests, such as requests for sign language interpretation, Sun Metro requests at least two-week advance notice.
5. May someone request a reasonable accommodation on my behalf? Yes, anyone can request a reasonable accommodation on behalf of an individual with a disability who seeks to interact with Sun Metro staff or participate in its programs or activities.
6. What will Sun Metro do upon receiving my request for a reasonable accommodation? Sun Metro may contact you to obtain more information about your request and to better understand your needs. In addition, Sun Metro may review your request to determine:
  - Whether the requested accommodation will be effective in helping you to participate in the activity or program in which you are seeking participation;
  - Whether the requested accommodation is reasonable or an equally effective alternative to the requested accommodation if available; and
  - Whether providing you with the requested accommodation would fundamentally alter the nature of Sun Metro's program or impose undue financial or administrative burden on Sun Metro.
7. May Sun Metro request medical documentation from you after receiving your request for a reasonable accommodation? No, Sun Metro may not request medical documentation after receiving your request for a reasonable accommodation. Sun Metro's questions will be limited to understanding the barrier to your ability to participate in the program or activity in which you are interested and the nature of an accommodation that will remove this barrier.
8. May Sun Metro charge you the cost of providing the reasonable accommodation? No, you are not responsible for the cost of an auxiliary aid or service Sun Metro provides to you.
9. What are some examples of reasonable accommodations? There are many types of reasonable accommodations. Some examples of how Sun Metro provides reasonable accommodations include:
  - Arranging for qualified sign language interpreters
  - Providing on-site captioning
  - Providing alternate formats of print materials in braille, large print, or in an electronic format
  - Providing remote conference captioning services
  - Furnishing a temporary step to access the date or other areas with one or more steps to ensure accessibility for individuals who have physical disabilities and may be using a wheelchair or walker

On a case-by-case basis what accommodations can be made.

If Sun Metro determines that your requested accommodation would fundamentally alter the nature of the program or impose an undue financial or administrative burden, Sun Metro may deny your request. However, in the unlikely event that this occurs, Sun Metro will work with you to identify an alternative accommodation that allows you to effectively participate in Sun Metro's program, activity, or service.

7. May Sun Metro request medical documentation from you after receiving your request for a reasonable accommodation? No, Sun Metro may not request medical documentation after receiving your request for a reasonable accommodation. Sun Metro's questions will be limited to understanding the barrier to your ability to participate in the program or activity in which you are interested and the nature of an accommodation that will remove this barrier.

8. May Sun Metro charge you the cost of providing the reasonable accommodation? No, you are not responsible for the cost of an auxiliary aid or service Sun Metro provides to you.

9. What are some examples of reasonable accommodations? There are many types of reasonable accommodations. Some examples of how Sun Metro provides reasonable accommodations include:
 

- Arranging for qualified sign language interpreters
- Providing on-site captioning
- Providing alternate formats of print materials in braille, large print, or in an electronic format
- Providing remote conference captioning services
- Furnishing a temporary step to access the date or other areas with one or more steps to ensure accessibility for individuals who have physical disabilities and may be using a wheelchair or walker

### DISCRIMINATION COMPLAINTS PROCESS

The City of El Paso – Sun Metro does not promote or tolerate discrimination. Sun Metro has established a process through which allegations of discrimination are investigated and resolved.

**COMPLAINT SUBMISSION**

If someone believes they have suffered from discrimination (includes race, color, sex, national origin, age, disability, religion, or genetic information) under a Sun Metro program of transit service delivery or related benefits, they may contact Sun Metro to seek an informal resolution. If the matter cannot be resolved informally, the following steps will be utilized:

- Within 180 days of the alleged discrimination, complainants may submit a written or verbal complaint to Sun Metro. Complaints must include the complainant's name (aliases be listed as anonymous), the nature of the complaint, the date of the alleged discrimination, requested action, and contact information.
- Complainants may submit a complaint in-person, by mail or over-the-phone with:
 

Sun Metro  
Attn: Customer Service – Nondiscrimination  
10151 Montana Ave.  
El Paso, TX 79925  
(915)212-3333

If a complainant prefers to submit a complaint by e-mail, the complainant may call Sun Metro at (915)212-3333, and an appropriate e-mail address will be provided.

Complainants may also file a complaint with the FTA Office of Civil Rights:

E-mail: [FTA@CivilRightsCommunications@dot.gov](mailto:FTA@CivilRightsCommunications@dot.gov) (with "FTA complaint form" in the subject line)  
Phone: 1-888-444-4511

U.S. Mail:  
Federal Transit Administration Office of Civil Rights  
Attn: Complaint Team East Building, 5th Floor – TCR 1200  
New Jersey Ave., SE Washington, D.C. 20590

- If a complainant has a disability, the complainant may obtain information about the complaint process in alternative formats such as large print, audio, or accessible electronic format.
- If a complainant has limited English proficiency, the complainant may obtain information about the complaint process by requesting a qualified foreign language interpreter and information written in other language to ensure meaningful access to programs and activities. If a complainant requires these services, they may contact:
 

David Garcia  
Business and Customer Service Assistant Manager  
GarciaDX3@elpasotexas.gov  
(915) 212-3333

**COMPLAINT REVIEW AND PROCESSING**

- Sun Metro will review each complaint and may request additional information from the complainant as needed. If additional information is requested and not received, the complaint may be closed. The complainant may also be closed if the complainant no longer wishes to pursue the complaint.
- Complaints will be recorded in an electronic log maintained by Sun Metro containing the complainant's contact information, nature of the complaint, date of submission, and results of the investigation. Log will be retained on an ongoing basis, and will not be posted. Information contained in log will be considered confidential and will be stored on the City's network with access limited to Sun Metro staff designated by the Director.
- Any complaint received within the jurisdiction of Sun Metro will be promptly and impartially investigated. Sun Metro's goal is to initiate an investigation of all complaints within 25 days of receipt, though the time to conduct an investigation may be longer depending on the nature and complexity of the complaint.
- Note: When possible, every effort will be made to resolve a complaint informally. In a case where an informal accommodation may be made to complainant, the complainant may choose to withdraw the complaint, and the complaint will be closed and the withdrawal recorded in the log.

**COMPLAINT INVESTIGATION**

All complaints will be investigated impartially. Reasonable measures will be undertaken to preserve any information that is confidential. Sun Metro will review every complaint and assign a neutral party to investigate. Neutral shall mean an individual employed by Sun Metro not assigned to the particular operation in question, or a qualified individual not employed by Sun Metro. At a minimum, the investigating officer will:

- Identify and review all relevant documents, practices, and procedures;
- Identify persons with knowledge of the complaint, including but not limited to the complainant, witnesses, or any person identified by the complainant, or who may have been subject to similar activity, and provide an invitation to be interviewed in person or by phone; and
- Sun Metro will inquire whether the complainant has filed the complaint with another agency, such as FTA Office of Civil Rights. In general, duplicate investigations. If the complainant has submitted a duplicate complaint, Sun Metro will contact the relevant agency to cooperate and coordinate with in the investigation.

Upon completion of the investigation, Sun Metro will complete a final report summarizing the findings for the Director of Mass Transit. If a civil rights violation is found to exist, remedial steps as appropriate and necessary, will be implemented. The complainant will receive a final report that identifies any remedial actions implemented by Sun Metro in accordance with City policies and procedures. The investigation process and final report is expected to be completed within 45 days of receipt, unless exceptional circumstances warrant an extended investigation and reporting period.

**PUBLIC NOTICE**

Sun Metro will ensure notice is posted at all transit center locations informing the public of its nondiscrimination policy and how to submit a complaint. The notice will also be posted in Spanish, in order to accommodate persons with limited English proficiency.



## COMO PRESENTAR UNA QUEJA DE DISCRIMINACION

Si considera que La Ciudad de El Paso – Sun Metro no ha proporcionado estos servicios, o ha discriminado de cualquier otra manera por motivos de raza, color, nacionalidad (incluyendo idioma), discapacidad, sexo, edad, o religión puede presentar una queja en persona o por correo postal, a:

Sun Metro  
Attn.: Servicios a el Cliente  
No-discriminacion  
10151 Montana Ave.  
El Paso, TX 79925

Si prefiere hacer su queja por correo electronico, por favor llamar a el (915) 212-3333 y se le proporcionara un correo electronico apropiado.

También puede presentar una queja de derechos civiles ante la Oficina de Derechos Civiles de Administración Federal de Tránsito.

Correo electrónico:  
[FTACivilRightsCommunications@dot.gov](mailto:FTACivilRightsCommunications@dot.gov)  
(incluya "FTA complaint form" en la línea de asunto)

Correo postal de EE. UU.:

Federal Transit Administration  
Office of Civil Rights  
Attn: Complaint Team  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Ave., SE  
Washington, D.C. 20590

Teléfono: 1-888-444-4511

### Información y servicios para personas con discapacidades o con dominio limitado del inglés


La Ciudad de El Paso – Sun Metro:

- Ofrece asistencia y servicios gratuitos, como servicio profesional de intérpretes de lengua de señas, e información escrita en otros formatos (letra grande, audio, electrónico, etc.) para permitir una comunicación eficiente con personas con discapacidades.
- Ofrece servicio gratuito de idiomas, como servicio profesional de intérpretes de idiomas extranjeros e información escrita en otros idiomas, para garantizar el acceso satisfactorio a programas y actividades para personas con dominio limitado del inglés.

Si necesita estos servicios, comuníquese con:

David Garcia, Subgerente de Empresa y Servicio al Cliente  
[GarciaDX3@elpasotexas.gov](mailto:GarciaDX3@elpasotexas.gov)  
(915) 212-3333

**Figure 2: Title VI Policy Public Notice**



## Sun Metro

---

**MAYOR**  
Oscar Leeser

**DATE:** May 13, 2023

**FROM:** Anthony DeKeyzer, Director of Mass Transit, Sun Metro

**CITY COUNCIL**  
**SUBJECT:** POLICY AND NOTICE OF NONDISCRIMINATION

**District 1**  
Brian Kennedy

**District 2**  
Alexandra Annelo

**District 3**  
Cassandra Hernandez

**District 4**  
Joe Molinar

**District 5**  
Isabel Salcido

**District 6**  
Art Fierro

**District 7**  
Henry Rivera

**District 8**  
Chris Canales

**CITY MANAGER**  
Tommy Gonzalez

The City of El Paso – Sun Metro complies with Federal civil rights laws and is committed to providing its programs and services without discrimination in accordance with:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin (including language).
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability.
- Title IX of the Education Amendments Act of 1972, which prohibits discrimination based on sex in education programs or activities.
- Age Discrimination Act of 1975, which prohibits discrimination based on age.
- U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs.


It is against the law for The City of El Paso – Sun Metro to retaliate against anyone who takes action to oppose discrimination, files a grievance, or participates in the investigation of a grievance in accordance with the above authorities.

**NORMA Y NOTIFICACIÓN DE AVISO DE NO DISCRIMINACIÓN**


The City of El Paso – Sun Metro cumple con las leyes federales de derechos civiles y está comprometido a proporcionar programas y servicios libres de discriminación, de conformidad con:

- Título VI de la Ley de Derechos Civiles de 1964, que prohíbe la discriminación basada en la raza, color, o nacionalidad (incluido el idioma).
- Artículo 504 de la Ley de Rehabilitación de 1973, que prohíbe la discriminación basada en la discapacidad.
- Título IX de la Ley de Enmiendas a la Educación de 1972, que prohíbe la discriminación basada en el sexo en los programas o actividades educativos.
- Ley de Discriminación por Edad de 1975, que prohíbe la discriminación basada en la edad.

**Anthony DeKeyzer, LSSBB, TSSP- Director of Mass Transit**  
Sun Metro | 10151 Montana Ave | El Paso, TX 79925  
O. (915) 212-3306 | Email: [DeKeyzerAR@elpasoelxas.gov](mailto:DeKeyzerAR@elpasoelxas.gov)



DEL VERING EXCEPTIONAL SERVICES



## Sun Metro

---

**MAYOR**  
Oscar Leeser

- Normativa 6, Parte 19, del Código de Regulaciones Federales (C.F.R.) del Departamento de Seguridad de EE. UU., que prohíbe la discriminación basada en la religión en los programas de servicios sociales.

**CITY COUNCIL**  
Es contrario a la ley que The City of El Paso – Sun Metro tome represalias contra cualquier persona que tome medidas para oponerse a la discriminación, presente una queja o participen la investigación de una queja de acuerdo con las autoridades anteriores.

**District 1**  
Brian Kennedy

**District 2**  
Alexandra Annelo

**District 3**  
Cassandra Hernandez

**District 4**  
Joe Molinar

**District 5**  
Isabel Salcido


**District 6**  
Art Fierro

**District 7**  
Henry Rivera

**District 8**  
Chris Canales

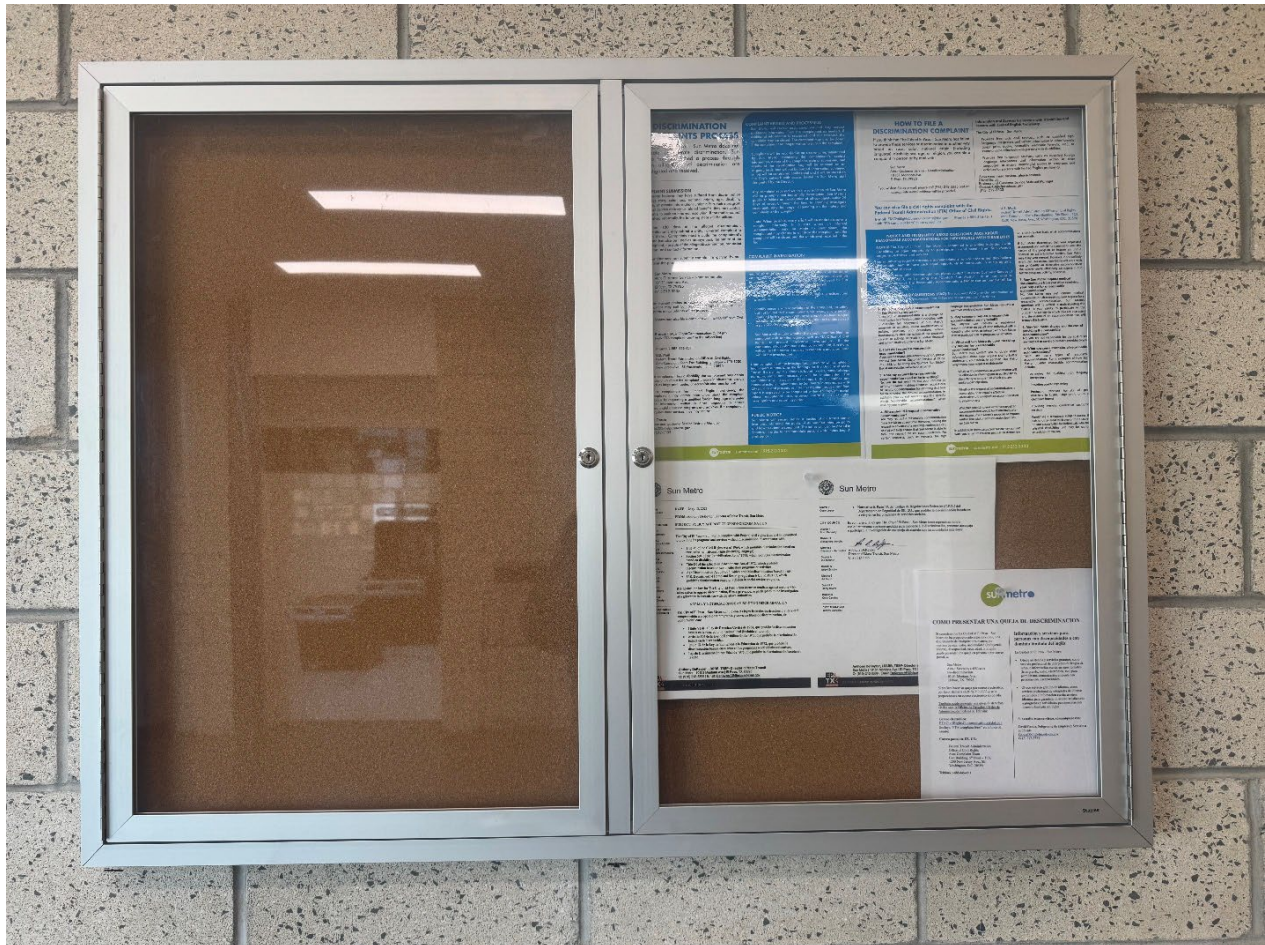
**CITY MANAGER**  
Tommy Gonzalez

**Anthony DeKeyzer, LSSBB, TSSP- Director of Mass Transit**  
Sun Metro | 10151 Montana Ave | El Paso, TX 79925  
O. (915) 212-3306 | Email: [DeKeyzerAR@elpasoelxas.gov](mailto:DeKeyzerAR@elpasoelxas.gov)



DELIVERING EXCEPTIONAL SERVICES

**Figure 3: Nondiscrimination Public Notices Displayed at Transit Centers**



## 2. Title VI Complaint Procedure and Complaint Form

Sun Metro has established a process for riders to file a complaint under Title VI. A copy of Sun Metro’s Discrimination Complaints Process is included in **Appendix A**. Any person who believes they have been discriminated against on the basis of race, color, national origin, disability, sex or age by Sun Metro may file a Title VI complaint by completing and submitting the agency’s Title VI Discrimination Complaint Form (**Figure 5**). Forms are available at our administrative offices or on our website at <https://sunmetro.net/about/title-vi-and-dbe/>

Figure 4: Public Notice on Buses

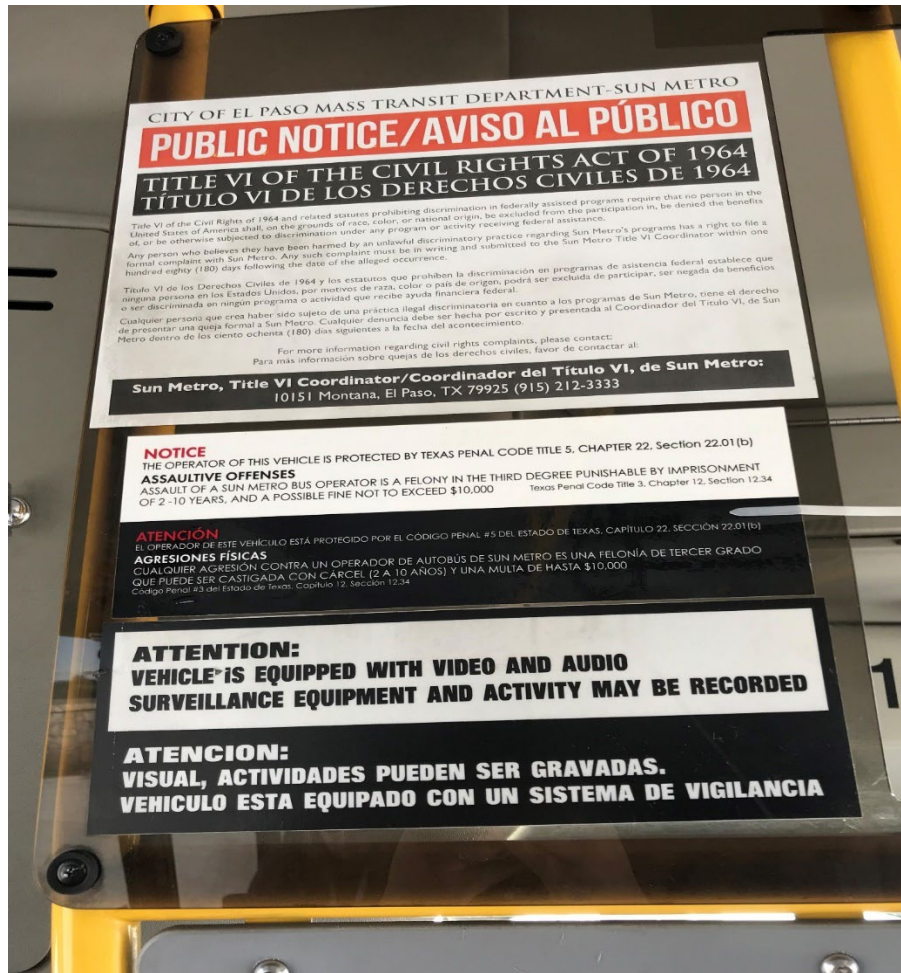


Figure 5: Discrimination Complaint Form (Page 1)



**Discrimination Complaint Form**  
**Formulario de Reclamo por Discriminación**

Name (Nombre) \_\_\_\_\_  
Address (Dirección) \_\_\_\_\_  
City (Ciudad) \_\_\_\_\_ State (Estado) \_\_\_\_\_ Zip (Código Postal) \_\_\_\_\_  
Telephone (Teléfono): Home (Casa) \_\_\_\_\_ Work (Trabajo) \_\_\_\_\_  
Cell (Celular) \_\_\_\_\_  
Email address (Correo electrónico) \_\_\_\_\_

**Basis of Complaint: Mark all that applies.**  
**(Fundamento(s) del reclamo: Marque todo lo que corresponda):**

- |   |  |
|---|--|
| <input type="checkbox"/> Race (Raza)                    | <input type="checkbox"/> Disability (Discapacidad) |
| <input type="checkbox"/> Color (Color)                  | <input type="checkbox"/> Sex (Sexo)                |
| <input type="checkbox"/> National Origin (Nacionalidad) | <input type="checkbox"/> Age (Edad)                |

**How were you allegedly discriminated against? (¿Cómo ocurrió el presunto acto de discriminación?)**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Who allegedly discriminated against you?**  
**(¿Quién considera usted que ejerció discriminación contra usted?)**

Name of Organization (Nombre de la organización) \_\_\_\_\_  
Address (Dirección) \_\_\_\_\_  
City (Ciudad) \_\_\_\_\_ State (Estado) \_\_\_\_\_ Zip (Código Postal) \_\_\_\_\_  
Telephone (Teléfono): \_\_\_\_\_

**Where did the alleged discrimination occur? (¿Dónde ocurrió el presunto acto de discriminación?)**

\_\_\_\_\_  
\_\_\_\_\_

**Date/s and times discrimination occurred**  
**(Fecha(s) y hora (s) cuando ocurrió (ocurrieron) el (los) presunto(s) acto (s) de discriminación)**

\_\_\_\_\_

**Figure 5: Discrimination Complaint Form (Page 2)**

First time (Primera Vez) \_\_\_\_\_  
 Second time (Segunda Vez) \_\_\_\_\_  
 Third time (Tercera Vez) \_\_\_\_\_

Were there any other witnesses to the alleged discrimination?  
 (¿Hubo testigos del presunto acto de discriminación?)

Name (Nombre)	Work Telephone (Teléfono del trabajo)	Home Telephone (Teléfono de la casa)	Cell Telephone (Teléfono celular)

What can the Department do to resolve the complaint?  
 (¿Qué podemos hacer para solucionar esta queja?)

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Have you already filed this or other complaint before?  
 (¿Había presentado usted la misma o cualquier otra queja antes?)

Who? (¿Con quién?) \_\_\_\_\_  
 When? (¿Cuándo?) \_\_\_\_\_  
 Complaint number, if known (Número de caso, si lo sabe) \_\_\_\_\_

Signature (Firma) \_\_\_\_\_ Date (Fecha) \_\_\_\_\_

Mail to: Title VI Coordinator  
 Envíelo a: 10151 Montana Avenue  
 El Paso, TX 79925-1515

### 3. Record of Title VI Investigations, Complaints or Lawsuits

In compliance with 49 CRF Section 21.9(b), Sun Metro maintains a list of all complaints, investigations, and lawsuits naming Sun Metro, on the basis of race, color, and/or national origin. The list includes the date of the complaint, investigation, or lawsuit; and the actions taken in response to the complaints, investigations, and lawsuits. From February 1, 2023 to October 1, 2025, Sun Metro had approximately **8** Title VI-related complaints (**Table 1**). As of the most current writing of this program, there are no complaints or lawsuits pending which alleges discrimination on the grounds of race, color, national origin or any other form of discrimination.

**Table 1: Title VI-Related Complaints**

<b>Date</b>	<b>Type</b>	<b>Basis of Discrimination</b>	<b>Summary of Allegations</b>	<b>Finding</b>	<b>Action Taken</b>
February 22, 2023	Patron	Race, Color, Age, Gender, National Origin, Disability	Patron alleges she was tortured for riding the bus and using the restrooms at a transit center.	Unsubstantiated - Closed	Reply letter sent to patron.
July 6, 2023	Patron	Race, Color, Age, Gender, National Origin, Disability	Patron alleges she wasn't treated fairly.	Unsubstantiated - Closed	Reply letter sent to patron.
August 10, 2023	Patron	Race, Color, Age, Gender, National Origin, Disability	Patron alleges she was sexually harassed and oppressed.	Unsubstantiated - Closed	Reply letter sent to patron.
December 5, 2023	Patron	Race, Color, Age, Gender, National Origin, Disability	Patron alleges harassment and the bus operators are driving in a "racy way" and jerking the bus at all bus stops.	Unsubstantiated - Closed	Reply letter sent to patron.
May 8, 2024	Patron	Race	Patron alleges he was harassed, denied use of Sun Metro services, and discrimination at a transit center.	Referred - Closed	Investigation concluded. Reply letter sent to patron.
July 16, 2024	Patron	Race	Patron alleges a Sun Metro employee and Sun Metro in general was discriminating, harassing, and denying him bus service.	Referred - Closed	Investigation concluded. Reply letter sent to patron.
November 28, 2024	Patron	Race, Color, National Origin	Patron alleges Sun Metro denied her transit service and prohibited her from using transit centers.	Referred - Closed	Investigation concluded. Reply letter sent to patron.
June 3, 2025	Patron	Race, Color, National Origin, Gender	Patron alleges she was discriminated because Sun Metro buses would not pick her up.	Unsubstantiated - Closed	Reply letter sent to patron.

## 4. Sun Metro's Public Participation Plan

Sun Metro utilizes El Paso Metropolitan Planning Organization's Public Participation Program, which was revised September 20, 2024 and is available online at: <https://www.elpasompo.org/media/PublicParticipationPlan/PublicParticipationPlan.pdf>

### **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.

- I. A service/fare change proposal is developed internally or as a result of public comment;
- II. An internal review by the appropriate department is conducted (for example, Sun Metro's Finance, Planning, and Operations Divisions);
- III. Proposals are reviewed by Sun Metro's Citizen's Advisory Committee (C.A.C.);
- IV. A Title VI review of the proposal is conducted;
- V. 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;
- VI. Bilingual (English and Spanish) public outreach materials and a program are developed;
- VII. Outreach in advance of public information sessions is released (using the tool-box of media listed below);
- VIII. The 30 (service modifications) and 45 (fare adjustments) calendar days public comment period ends;
- IX. 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;
- X. The final service/fare change date is set;
- XI. Outreach is conducted in advance of any service or fare change;
- XII. Bilingual (English and Spanish) system timetable and website updated in advance of the proposed change.

### **Selection 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.

### **Methods of Media**

The following outreach efforts help alert system users and encourage engagement:

- Newspapers and other periodicals
- Bus and bus shelter advertisements
- Website
- Web-based feedback
- Social media
- Public hearings and public information sessions
- Radio
- On-board Scrolling Messages
- On-board Audio Messaging

### **The Incorporation of Public Comments into Decisions**

All comments received through the public participation plan are given careful and 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 Department Board for consideration.

## **[5. 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:

- The number and proportion of LEP persons served or encountered in the eligible service population;
- The frequency that people of Limited English Proficiency come into contact with Sun Metro’s programs, activities, and services;
- The importance of Sun Metro’s programs, activities, and services to persons of Limited English Proficiency; and
- 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**

According to available 2023 American Community Survey (ACS) data, out of 814,396 people within the El Paso County area, approximately 220,146 people speak English “less than well.”

Those reporting to have limited English proficiency consist of 27% of our service area population. Of the portion of respondents with limited English proficiency, 215,187 or 98% of them spoke mainly Spanish, 2,929 or 1.3% spoke an Asian language, 1,495 or 0.6% spoke an Indo-European Language, and another 423 or 0.1% chose “other.” Refer to **Table 2** for additional language breakdown.

### **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).

**Table 2: LEP Breakdown**

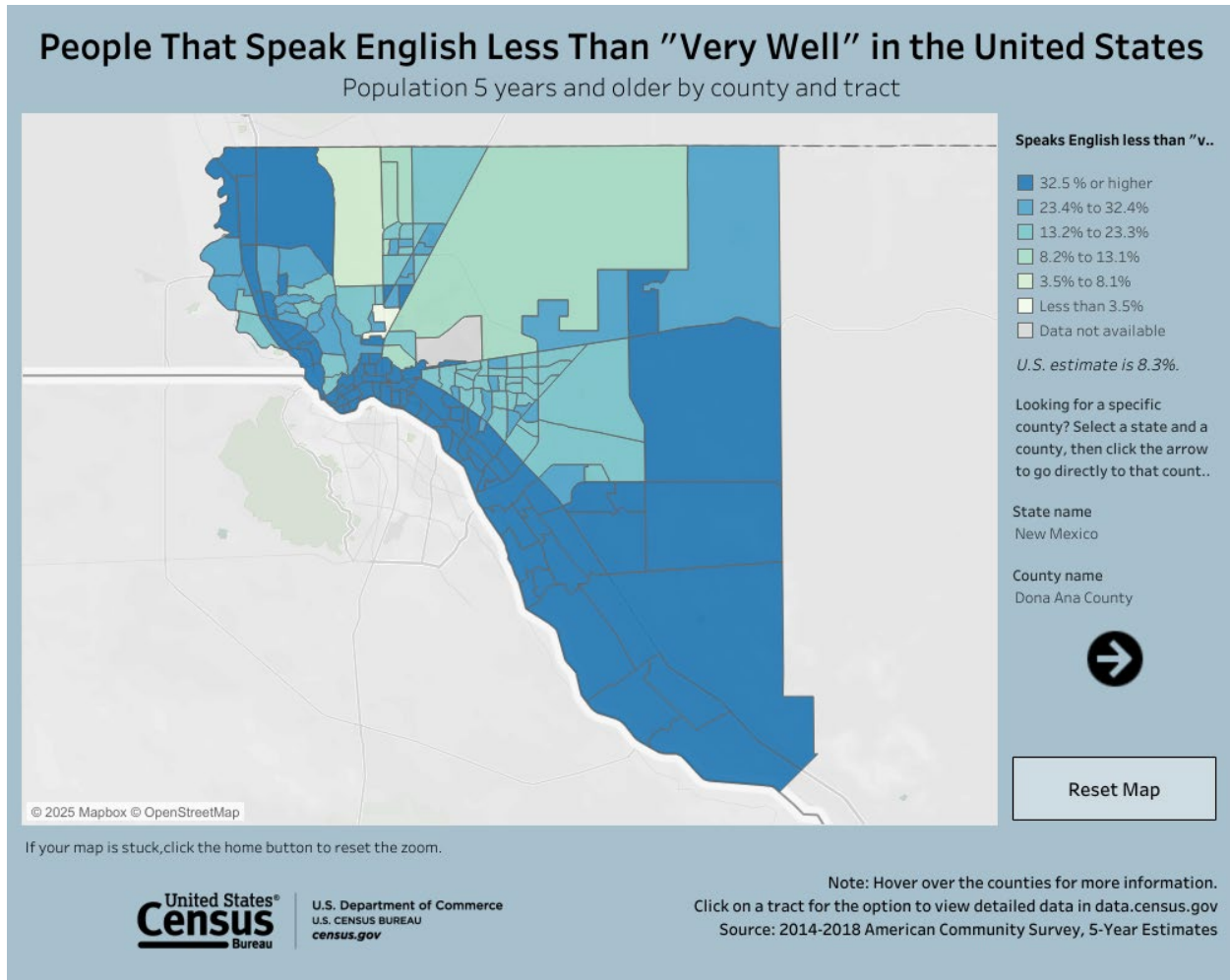
<b>Speak English Less Than “Well”</b>	<b>El Paso County, Texas Estimate</b>
Spanish or Spanish Creole	229,152
Korean	867
German	828
Chinese	775
Tagalog	531
Arabic	450
Vietnamese	351
French (incl. Patois, Cajun)	276
Other Indic Languages	272
Persian	247
Other Asian Languages	213
Japanese	176
Other Pacific Island Languages	158
Serbo-Croatian	128
Urdu	102
Gujarati	101
Russian	100
African Languages	90
Italian	82
Portuguese or Portuguese Creole	39
Mon-Khmer (Cambodian)	38
Thai	29
French Creole	29
Other Native North American Languages	23
Hungarian	22
Hebrew	21
Navajo	15
Other Indo-European Languages	15
Armenian	14
Other Slavic Languages	11
Other and Unspecified Languages	10
Greek	9
Hindi	7
Polish	5
Laotian	0
Other West Germanic Languages	0
Hmong	0
Scandinavian Languages	0
Yiddish	0

U.S. Census 2023: American Community Survey 5-Year Estimate Data

## 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 populations of limited English proficiency reside. The map below (**Figure 6**) provides a spatial display of residents who report speaking English “less than well.”

**Figure 6: LEP Population in El Paso, Texas**



## 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.

Living Independently Facilitated by Transportation (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. Sun Metro's Customer Service is 100% bilingual (English and Spanish) and can assist LEP individuals. The coach operators can also provide translation or interpretation assistance, if needed. Additionally, Sun Metro provides all of its public information in both English and Spanish. Braille signage is also available at all facilities, bus stops, and bus bays to assist visually impaired citizens.

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

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

- Examine requests for language assistance from past meetings or events to anticipate future language service needs;
- 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;
- 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.

- Attempt to determine what language is required;
- Use the U.S. Census Bureau's "I Speak" card if necessary;
- If the person can speak some English, try to discern their needs without the help of language service;
- For help with translating individual words, use Google Translate;
- 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

- 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. See Appendix B for the Title VI and 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 triennial schedule. It should also be revisited when new U.S. Census data is 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.

## 6. Minority Representation on Planning and Advisory 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 (CAC)

The CAC acts as an advisory body to the Mass Transit Department Board (MTDB) and advises it on any matters over which the MTDB board has authority. The CAC may recommend studies or expansion of the system, report results, and other matters the committee considers necessary and appropriate.

**Table 3: Citizen’s Advisory Committee Racial Breakdown**

Body	White (Not Hispanic or Latino)	Hispanic/Latino	Black or African American	Asian	Native Hawaiian/Other Pacific Islander	American Indian/Alaska Native	Two or More Races
Citizens Advisory Committee	3	4		1			

City Council Members represent the MTDB. The monthly MTDB 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.

## 7. 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.

### **Requirements for Fixed Route Transit Providers**

#### 1. System-wide 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 Compressed Natural Gas (CNG) fixed route fleet of 157 buses, with 100 required during weekday peak periods (between 6 a.m. to 9 a.m.). On Saturdays, 86 buses are required during peak periods with 26 peak buses on Sundays. All routes are designated wheelchair accessible and all buses assigned to routes are wheelchair lift-equipped. The standard fixed route fare is \$1.50.

The City's ADA complementary paratransit service (LIFT) is operated under contract with MV Transportation. MV operates a fleet of 58 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 4,466 active participants.

The LIFT provides curb-to-curb (origin to destination) on-demand transportation services for disabled citizens unable to use conventional public transportation. The 58 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**

Vehicle allocations to service each route shall be determined based on the size and type requirements of the route. This policy ensures that vehicles assigned are appropriate for the operational needs of the routes, including capacity demands, vehicles dimensions, and infrastructure compatibility at the assigned facilities.

## Guidelines

### Route Requirements:

Units will be assigned to routes taking into account the following limiting factors, such as ridership, roadway conditions, and route category (Brio, Express, local, etc.).

### Vehicle Size and Capacity:

Assignments will prioritize the use of vehicles with appropriate seating and standing capacity to accommodate typical passenger loads and peak demand.

### Accessibility:

All assigned units have to meet ADA requirements to provide accessible service on all routes.

### Implementation:

The Operations and Fleet Maintenance Departments will coordinate to review vehicles assignments based on performance data, service changes, and fleet availability.

## 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 approximate 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 90% of the time. Sun Metro has been averaging 90.4% 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 ¼ 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.

There are seven major ad hoc transfer points which are located at:

- Bert Williams Downtown Santa Fe Transit Center;
- Robert E. McKee Five Points Transit Center (central El Paso);
- Arves E. Jones, Sr. Transit Center at Northgate (northeast El Paso);
- Arturo Tury Benavides Eastside Transit Center;
- Upper Eastside Transit Center (far east El Paso);
- Al Jefferson Westside Transit Center;
- Nestor A. Valencia Mission Valley Transit Center;
- and Glory Road Transit Center (located by the University of Texas at El Paso).

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.

Express - Express service from the Westside, Northeast, Eastside and Lower Valley is provided to downtown El Paso. Sun Metro operates four express routes from nine 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.

## **Transit Amenities Policy**

Transit amenities should be distributed based on approved criteria that prioritize accessibility, maintenance feasibility, ridership demand, and safety. These amenities include but are not limited to shelters, benches, lighting, waste containers, bicycle racks, route signage, wayfinding signage, and real-time information displays. 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, and community-oriented organizations.

### Guidelines

#### Ridership Demand:

Amenities will be prioritized at stops with higher daily ridership to serve a greater number of passengers.

#### Safety and Security:

Amenities such as lighting and visibility features should be installed at locations that have been identified to have safety concerns or high pedestrian traffic to enhance rider security.

#### Accessibility:

Facilities should be designed and placed to be ADA-compliant to accommodate passengers with disabilities.

#### Environmental and Physical Constraints:

Placement will have to account for available space, other existing infrastructure in the immediate area, and environmental factors of the surrounding area to ensure practicality and maintenance feasibility.

#### Implementation:

Sun Metro departments will collaborate to conduct assessments periodically of amenity needs across the Transit Service Area of the City of El Paso, incorporating public feedback, ridership data, and field evaluations of potential sites of amenity improvements.

### Passenger Shelters

As of October 2025, there are 611 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 can be found under the section “Monitoring System-Wide Program Service Standards.”

### Passenger Stops

As of October 2025, there are 2,394 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.

### Park & Ride Facilities

Sun Metro operates 4 express routes from 9 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.

## El Paso Streetcar

On November 12, 2018, the El Paso Streetcar began service. The El Paso Streetcar route (**Figure 9**) 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;
- Safety upgrades;
- Modern propulsion;
- Streetcar branding along the route and signage at designated stops; and
- Pavement, sidewalk, and driveway improvements at designated stops.

Figure 7: El Paso Streetcar & Route Map



### Rapid Transit Service (RTS) Corridors

The highest transportation priority for the City and Sun Metro is the implementation of a four-line, citywide RTS/Transit Oriented Development (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.

## The Brio System

Brio is Spanish for excitement, verve, and energy. It is also 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.

**Figure 8: Mesa Brio – Arts District Bus Shelter**

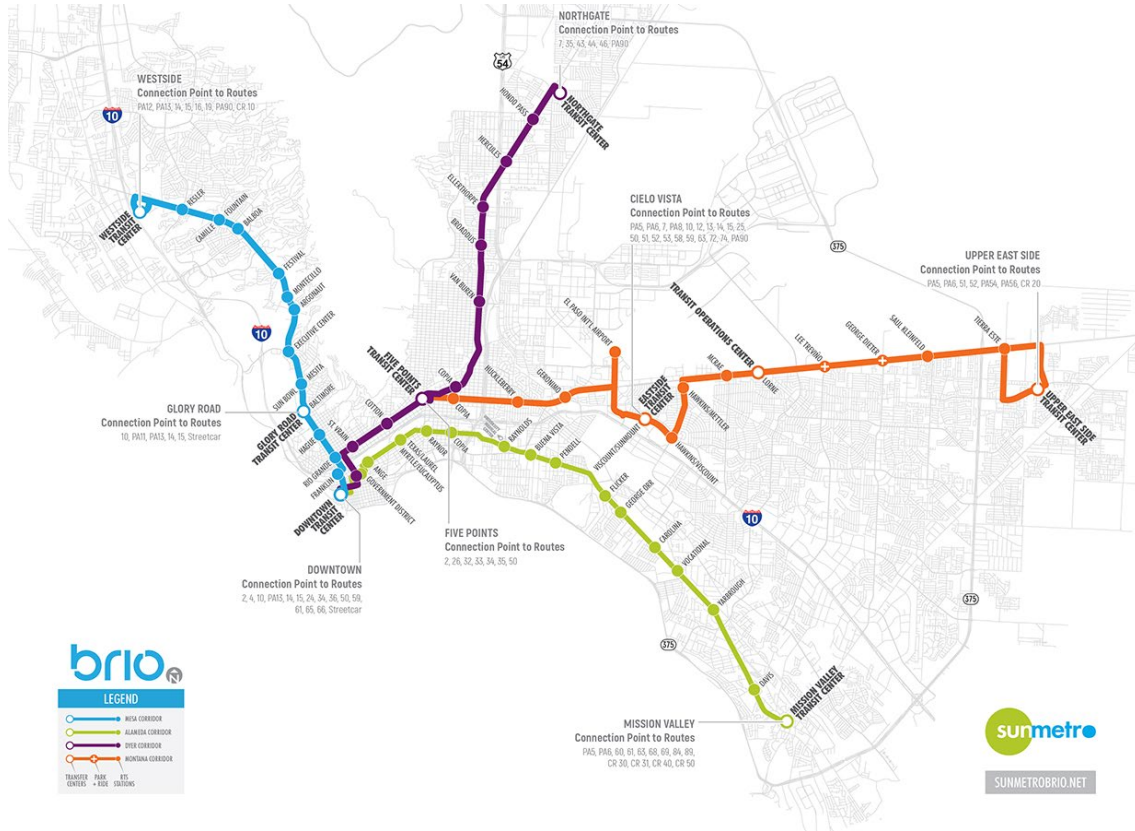


**Figure 9: Mesa Brio – Montecillo Bus Shelter**



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 become operational in the Fall of 2022. See **Figure 10** for Brio map.

Figure 10: 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.

**Figure 11: Brio Bus**



## 2. Collect and Report Demographic Data

Collection and Reporting of Demographic Data - 2022 Sun Metro On-Board Survey

### **Purpose of the Survey**

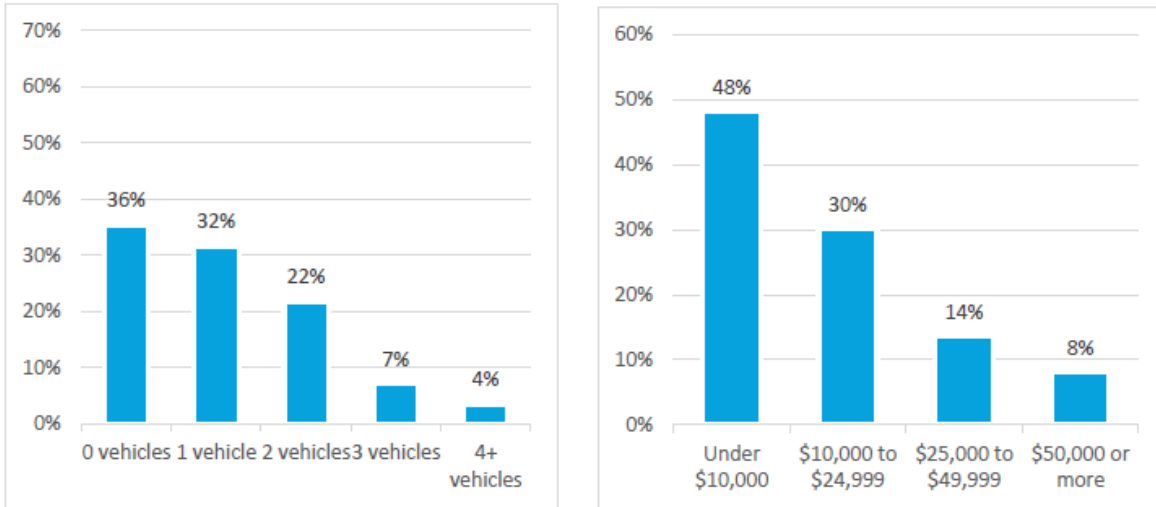
The primary purpose of this study was to provide Sun Metro, the Mass Transit Department Board, the El Paso Metropolitan Planning Organization, and the Texas Department of Transportation – El Paso District with information that will be used to help plan future improvements to the bus system in the City 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**

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

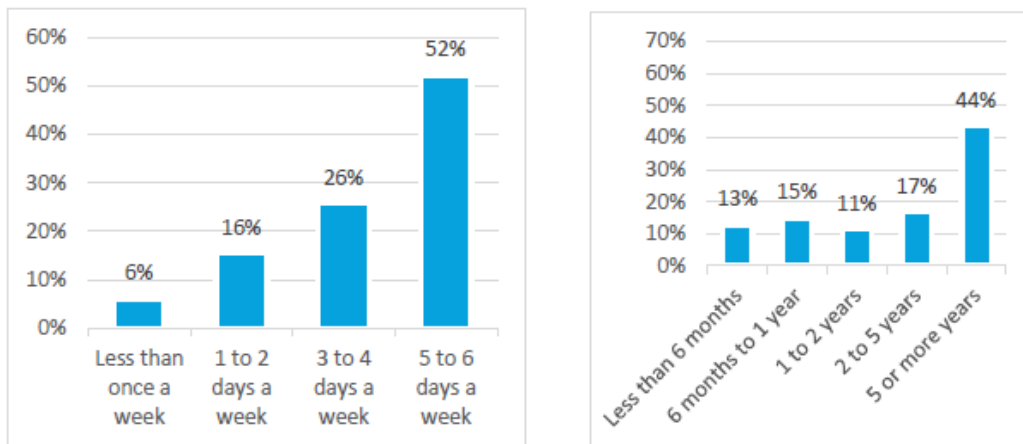
According to the survey results, 36% of Sun Metro riders do not own a vehicle and 48% live below the poverty level.



**Figure 12: 2022 Survey Results: Vehicles in the Household & Household Income**

### Sun Metro Usage & Rider Tenure

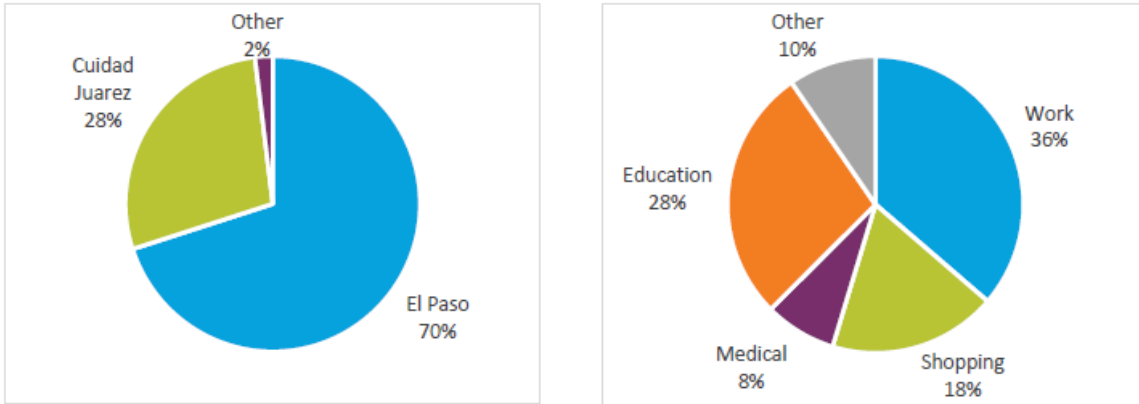
About 52% of individuals surveyed said they use Sun Metro’s transit service about 5-6 days a week and 44% are long-term riders.



**Figure 13: 2022 Survey Results: Ridership Usage & Tenure**

### Rider Origins & Destinations

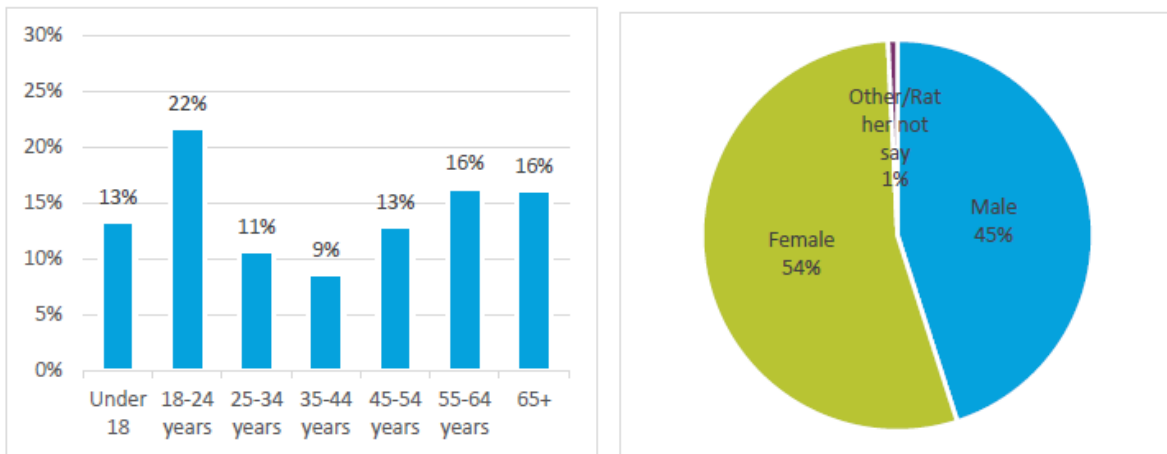
A majority (70%) of Sun Metro riders live in El Paso, while one-quarter (28%) live in Ciudad Juarez. The highest percentage (36%) of individuals use Sun Metro transit service to commute to work.



**Figure 14: 2022 Survey Results: Rider Origins & Destinations**

Rider Age & Gender

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

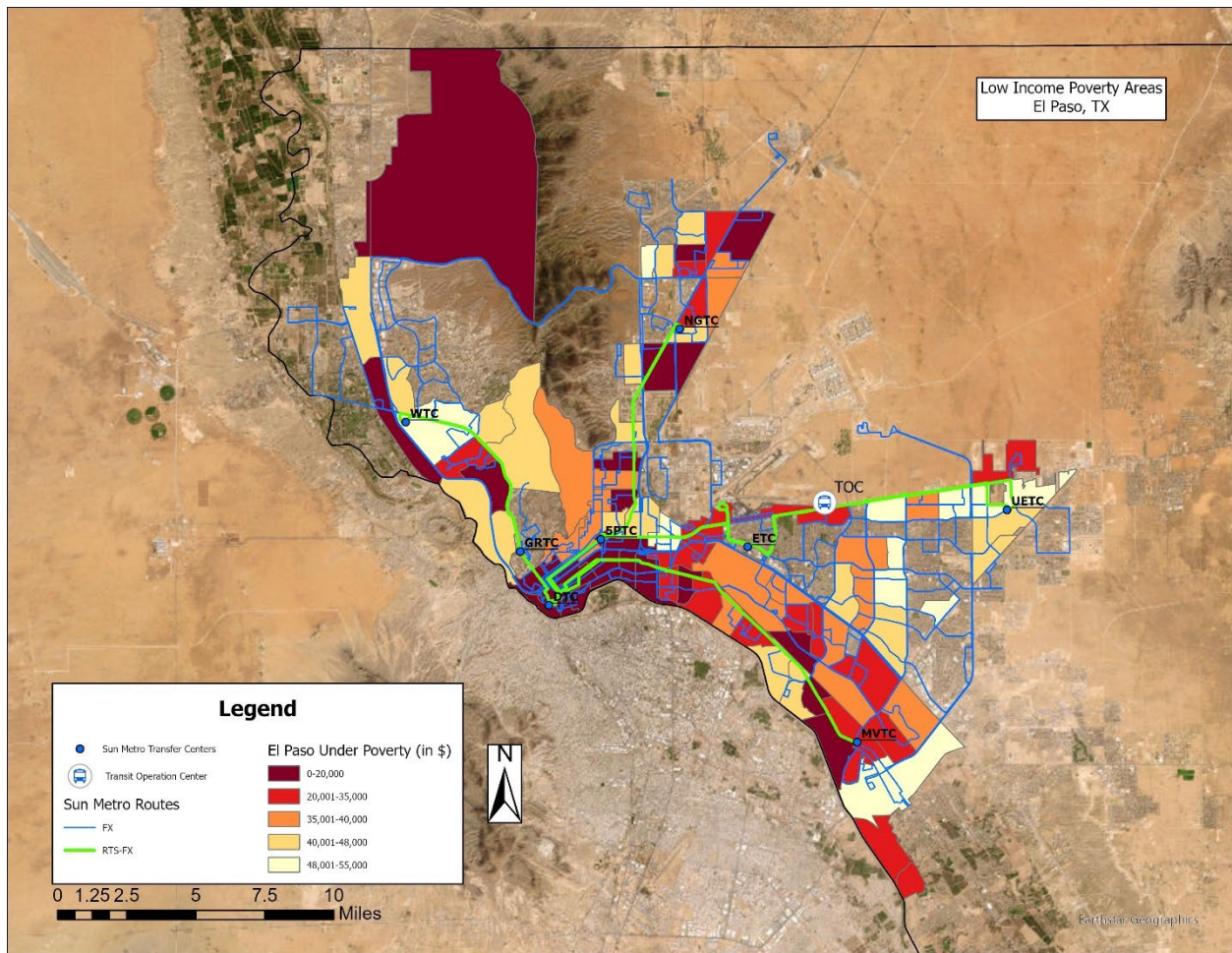


**Figure 15: 2022 Survey Results: Rider Age & Gender**

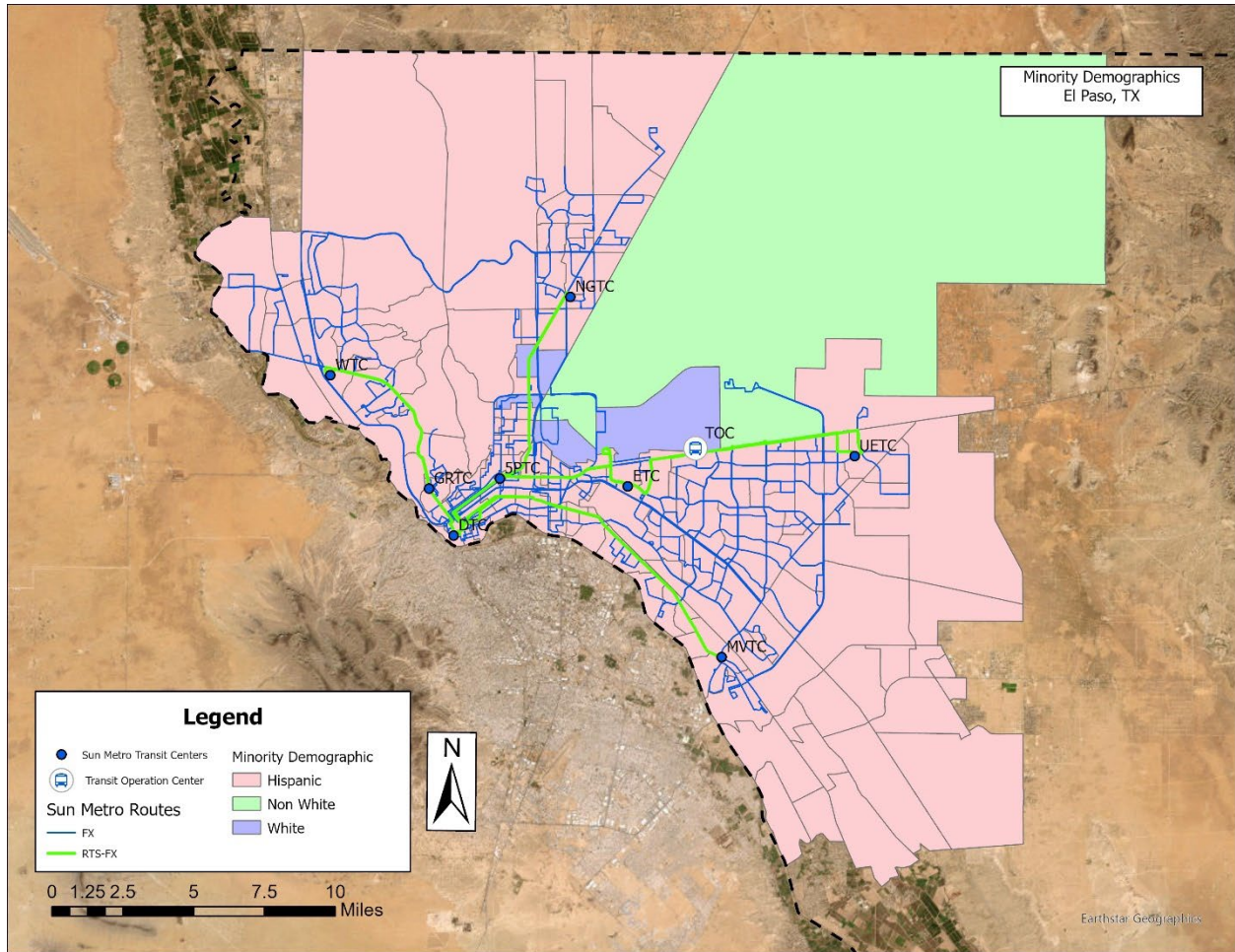
Figure 16: Title VI Monitoring: Sun Metro Transit Facilities Map with Transit Lines



**Figure 17: Title VI Monitoring: Sun Metro Transit Facilities Map with Transit Lines – Overlaid with Low Income Census Tracts**



**Figure 18: Title VI Monitoring: Sun Metro Transit Facilities Map with Transit Lines – Overlaid with Minority Census Tracts**



## Demographic Service Profile

### Transit Needs Index Factors

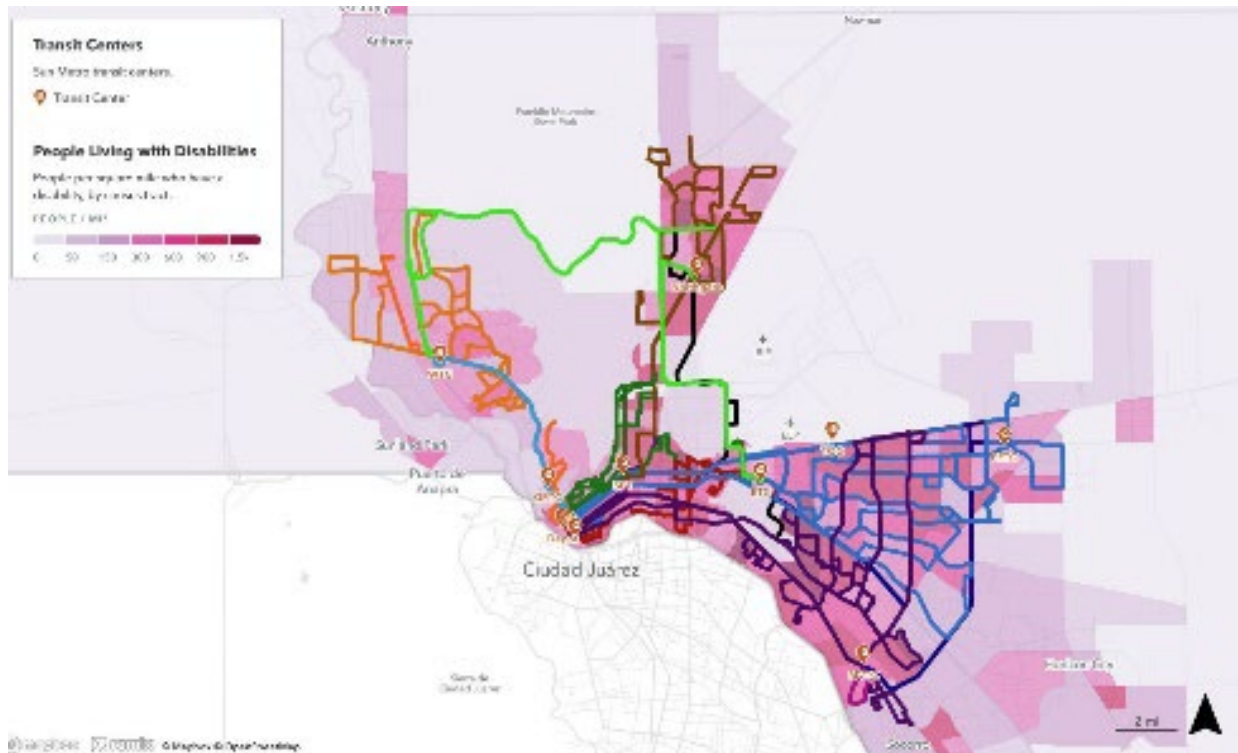
In reviewing 2018-2022: ACS (American Community Survey) 5-Year Estimates data for the El Paso Region on the disabled, elderly, household without an automobile, household below poverty level, and median income populations; the Transit Needs Index (TNI) serves as the basis to establish indicators of needs for transit and provides an analysis of the demographic groups in need of public transportation reliability. The lowest index score is 5 and the highest is 15.

#### Transit Needs Index Factor 1 – Disabled Population

Approximately 9.7% of the El Paso population is classified as having a disability (calculated from the U.S. Census 2021). See **Figure 19**.

- 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.

**Figure 19: El Paso Disabled Population Map**

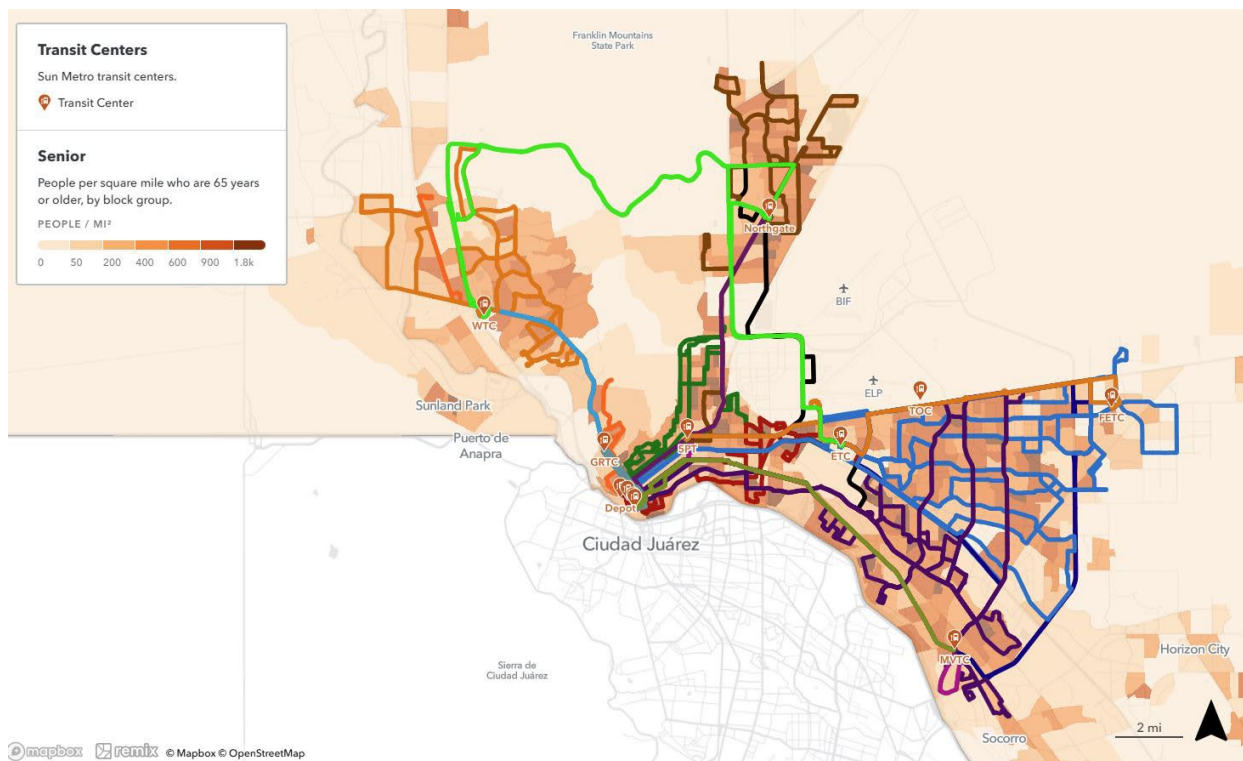


### Transit Needs Index Factor 2 – Elderly Population

A total of 13.5% of the El Paso population is older than 65 (U.S. Census 2021). See **Figure 20**.

- 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.

Figure 20: El Paso Elderly Population Map



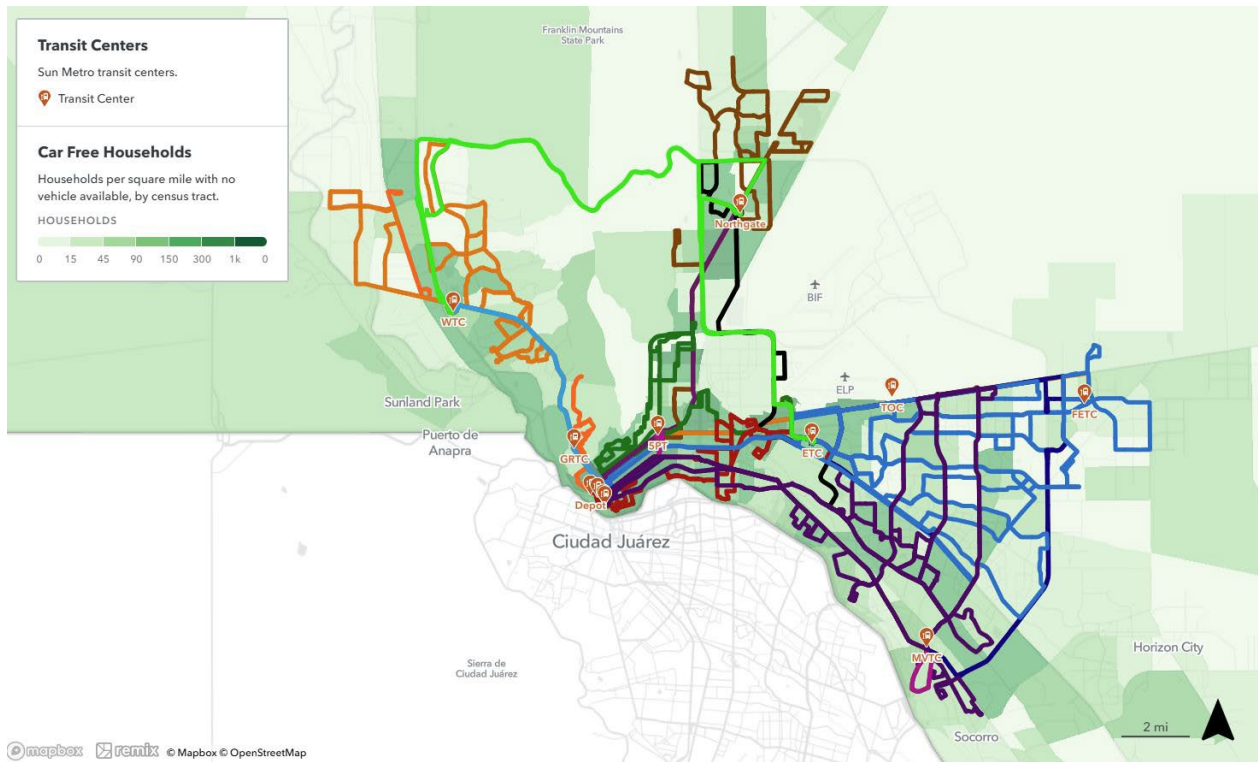
### Transit Needs Index Factor 3 – Percentage of Households without an Automobile

Households lacking an automobile in the City of El Paso are significantly challenged with respect to mobility options. In El Paso, 8.4% of households do not have at least one vehicle. See **Figure 21**.

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.

**Figure 21: El Paso Households w/o Automobile**

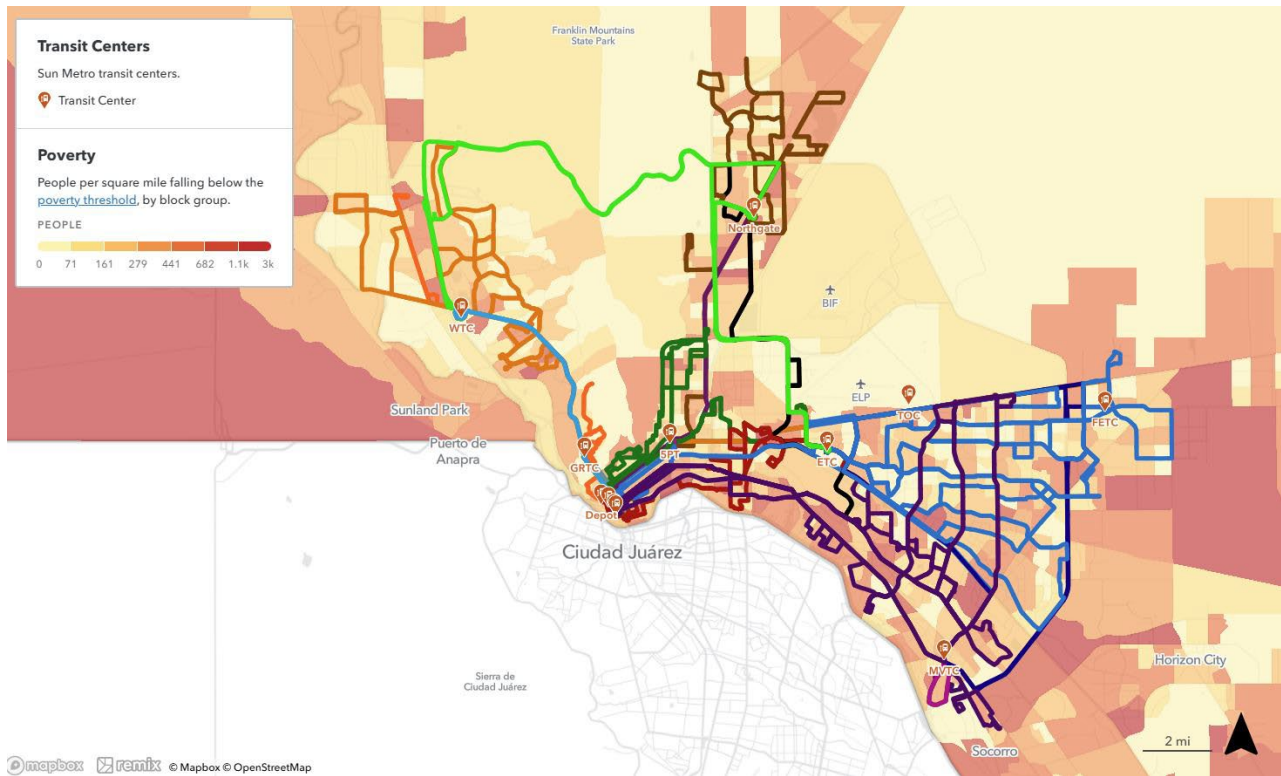


#### Transit Needs Index Factor 4 – Percentage of Household below Poverty Level

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. In El Paso, 18.5% of households are living below the poverty level. See **Figure 21**.

- 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.

**Figure 22: El Paso Poverty Level**

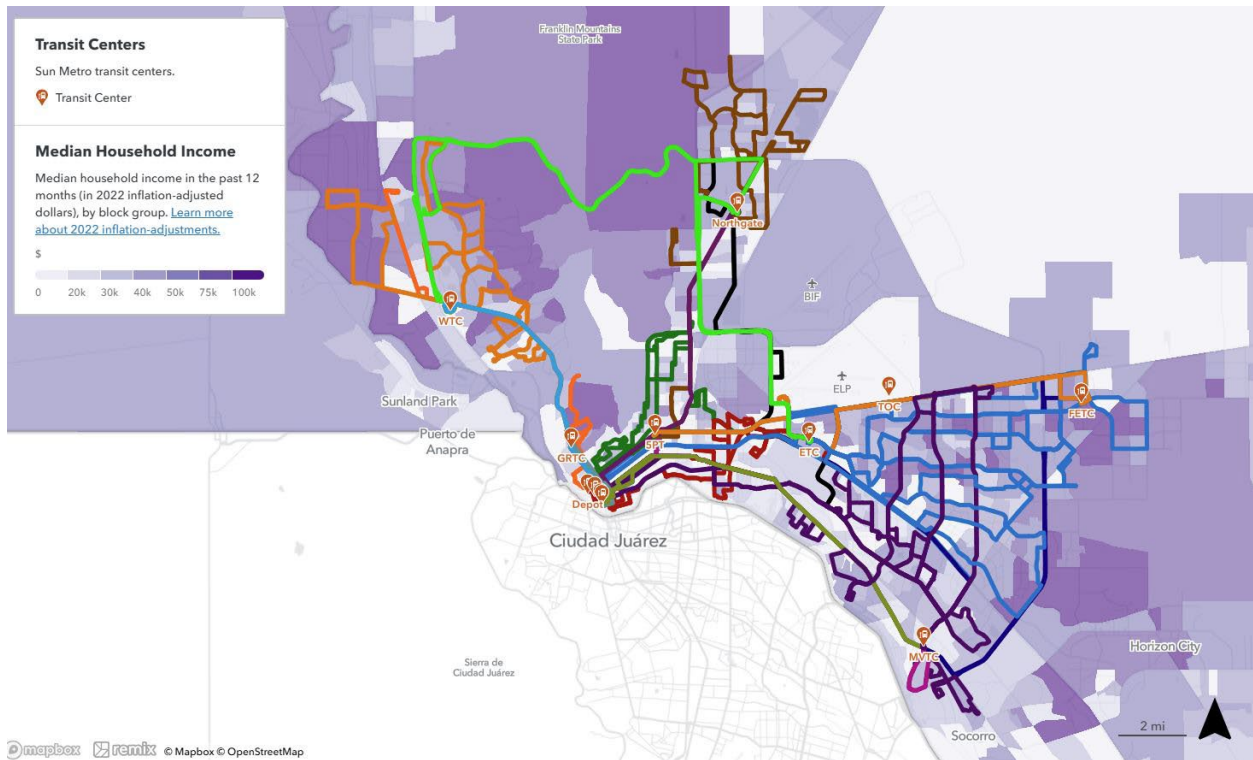


### Transit Needs Index Factor 5 – Median Household Income

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, the median household income is \$58,859. See **Figure 23**.

- 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.

**Figure 23: El Paso Median Household Income**



### 3. Monitoring of Service Standards

As part of the Title VI Program update, the Federal Transit Administration (FTA) requires transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies not less than every three years to remain in compliance with Title VI requirements. This section detailing Sun Metro’s service monitoring results are divided into six sections corresponding to the four standards and two policies established in Circular 4702.1B for service monitoring:

- Standards
  - Vehicle Load
  - Vehicle Headway
  - On-time Performance
  - Service Availability
- Policies
  - Distribution of Transit Amenities
  - Vehicle Assignment

Using the methodology and standards developed for each of these metrics in the Service Standards and Policies section of Sun Metro’s 2025 Title VI Program (set for the three-year period of 2023-2025), Sun Metro concludes that there are no disparate impacts in the level of service that it provides.

### **Methodology**

For each reviewed bus route, we calculated the percentage of all persons residing in areas served by the route, who are minority persons. We defined the geographic area of coverage for each route by including all Census block groups within one half-mile walking distance of bus stops served by that route. For each route, we calculated the number of minority persons residing in all block groups served and determined the percentage of minority persons among all persons served by the route. If a route provides at least one-third of its service in a minority block group, it is classified as a minority route.

Sun Metro has 52 fixed routes, of which, 43 are identified as minority and low-income. Sun Metro monitored all routes during the morning peak (6:00 A.M. to 9:00 A.M.) for the month of August 2025.

### **Vehicle Load Monitoring**

As defined by FTA Circular 4702.1B, *vehicle load* is expressed as the ratio of passengers to the total number of seats on a vehicle.

### **Analysis**

Sun Metro’s System-wide Standards and Policies states a standard vehicle 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 on the BRIO routes, specifically during peak hours. 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.

**Table 1** below shows passenger capacities for buses as the average maximum number of persons seated and standing during a weekday. The maximum load factors represent the maximum achievable capacity and are calculated by dividing the total seated and standing capacity by the seated capacity of the vehicle. For the purposes of this evaluation, weekday headways were calculated using morning peak service time. The weekday morning peak service period is 6:00 AM to 9:00 AM.

**Table 1: Maximum Bus Load Standards**

Average Passenger Capacities					
Vehicle Type	Seated	Standing	Total	Maximum Load Factor	Maximum Load
35' Standard	30	20	50	1.70	51
40' Standard	40	20	60	1.50	60
60' Standard	46	39	85	1.90	87

For this evaluation, daily boarding by route and trip data was collected from the following Sun Metro divisions:

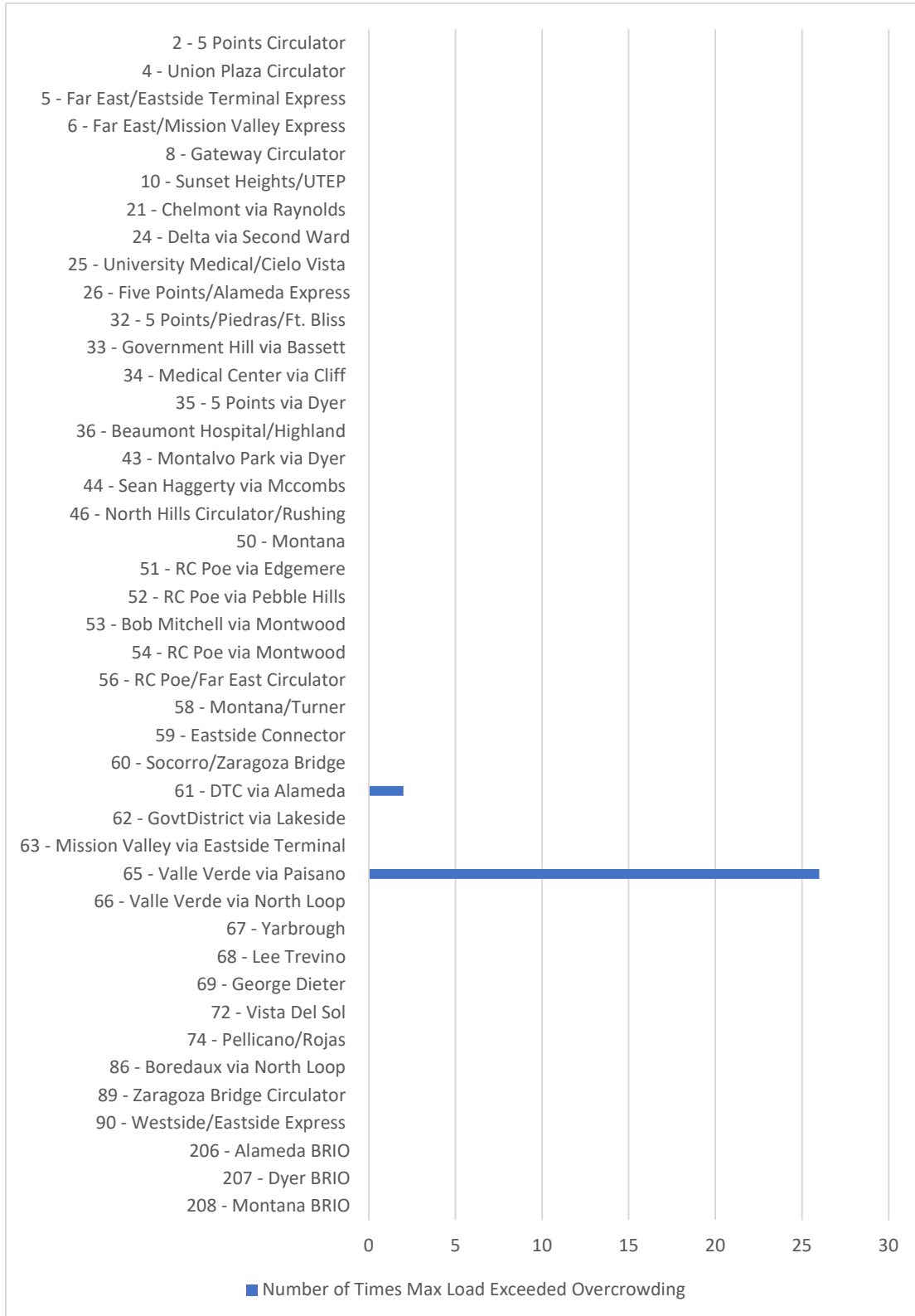
- Planning
- Scheduling
- Operations

Loads on Saturday and Sunday were excluded from the analysis since ridership is generally lower than weekday ridership, and weekend overloads are rare.

**Vehicle Load Monitoring Results**

Vehicle Load Monitoring was conducted for the period of September 1, 2025 to September 30, 2025, during the peak period of 6:00 AM to 9:00 AM. The maximum vehicle load for a 35-foot bus is limited to 51 passengers, a 40-foot bus is limited to 60 passengers, and a 60-foot bus is limited to 87 passengers. There was a grand total of 28 instances of overcrowding for a percentage of 0.5%. Chart 1 below shows there were two (2) routes that exceeded the maximum vehicle load during peak time. The routes were identified as 65 – Valle Verde via Paisano (26) and 61 – DTC via Alameda (2).

Chart 1: Vehicle Loads for Minority Routes – Number of Trips Exceeded the Vehicle Load



Source: Sun Metro Data Management Division

## Vehicle Headway Monitoring

As defined by FTA Circular 4702.1B, *vehicle headway* is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines and is measured in minutes.

### **Analysis**

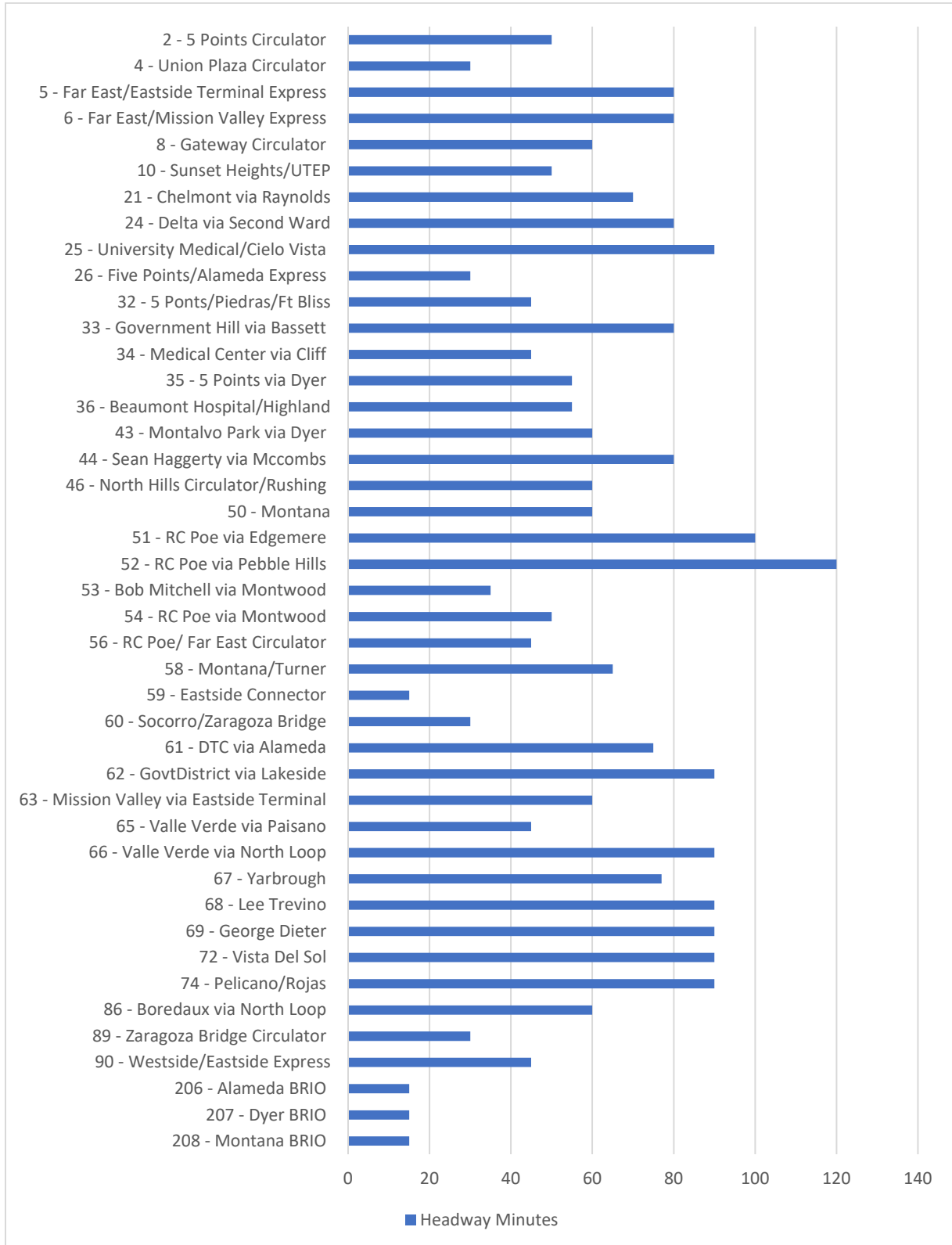
Sun Metro's vehicle headway standards allow maximum headways of 73.1 minutes for peak-period and 90.4 minutes for the base period. These times are consistent with industry standards.

### **Vehicle Headway Monitoring Results**

Chart 2 below shows the weekday morning peak headways for all minority routes. The average headway is 74 minutes for all routes. In total, 4 routes have a peak frequency of 15 minutes (59-Eastside Connector, 206-Alameda BRIO, 207-Dyer BRIO, 208-Montana BRIO). An additional 4 routes (4-Union Plaza Circulator, 26-Five Points/Alameda Express, 60-Socorro/Zaragoza Bridge, 89-Zaragoza Bridge Circulator) have a peak frequency of 30 minutes or less. The remaining 35 routes have headway ranges between 35 and 120 minutes. Approximately 16 routes were above the 73.1-minute headway standard.

The Operations Division will conduct an analysis to determine whether the cause was due to factors outside of Sun Metro's control, such as accidents, construction detours, or mechanical failures. If the analysis indicates that the issue was related to operator performance, appropriate coaching will be provided to address and correct the concern. Sun Metro will continue to monitor headways for all routes to ensure they are meeting agency standards.

Chart 2: AM Peak Vehicle Headway for Minority Routes



### On-time Performance Monitoring

As defined by FTA Circular 4702.1B, *on-time performance* is a measure of runs completed as scheduled.

#### Analysis

Sun Metro’s on-time performance is defined as arriving within 0-4 minutes of the scheduled published time. A bus is considered late if it departs its scheduled “time point” 5 or more minutes later than the published time. Buses are considered early if they depart from a published time at any time prior to the scheduled departure. Sun Metro’s on-time performance standard goal is 90% or better. Standards measured by Automatic Vehicle Locator (AVL) data are as follows:

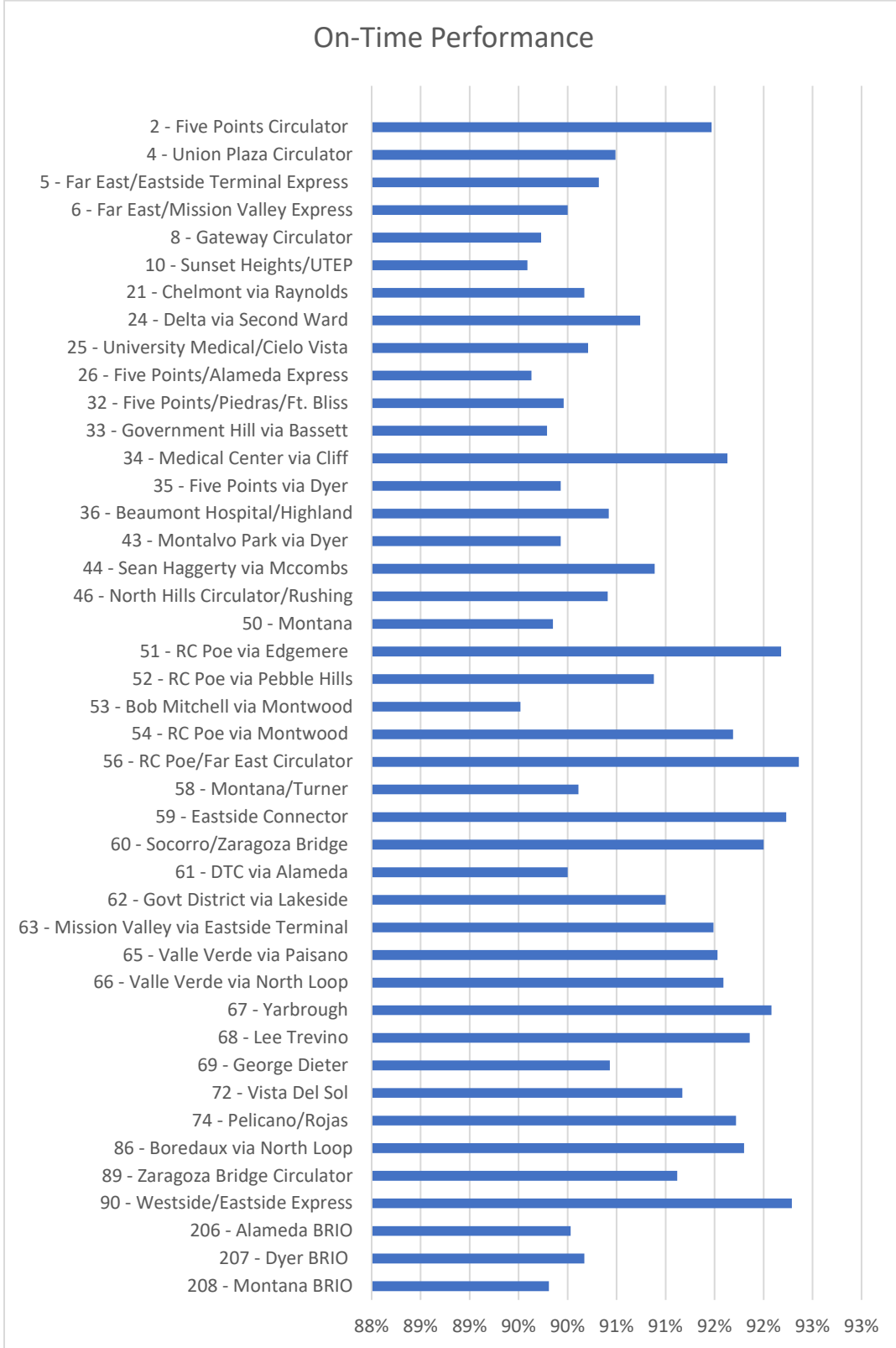
<b>ON-TARGET:</b>	90% or better
<b>NEEDS IMPROVEMENT:</b>	80% to 89%
<b>FAIL</b>	79% or less

Sun Metro compared every minority route’s actual departure time against scheduled departure times. Sun Metro used AVL data to determine the weekday morning peak on-time performance percentage.

#### On-time Performance Monitoring Results

Chart 3 shows Sun Metro’s average on-time performance is 90.8% for all routes. Routes that fall below the on-time performance standard shall be reviewed by Sun Metro’s Operations Division, as well as Planning & Scheduling Division. The Operations Division will conduct an analysis to determine whether the cause was due to factors outside of Sun Metro’s control, such as accidents, construction detours, or mechanical failures. If the analysis indicates that the issue was related to operator performance, appropriate coaching will be provided to address and correct the concern.

Chart 3: September 1, 2025 AM Peak On-time Performance



### Service Availability Monitoring

As defined by FTA Circular 4702.1B, *service availability* is a general measure of the distribution of routes within a transit provider's service area.

#### **Analysis**

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.

Currently, Sun Metro provides service availability for 67% of service area residents within one quarter mile of a bus stop and 72% for service area residents within one half mile of a bus stop with weekday all-day service.

#### **Service Availability Monitoring Results**

Table 2 below shows the percentage of minority and non-minority households served. The percentage of minority households within one quarter mile of a bus stop is 88%. The percentage of non-minority households within one quarter mile of a bus stop is 93%. The percentage of minority households within a half-mile walk of a bus stop is 98%. The percentage of non-minority households within one quarter mile of a bus stop is 2%.

**Table 2: Service Availability Standard**

Service Availability Standard	Minority	Non-minority
Within ¼ mile of a bus stop	88%	12%
Within ½ mile of a bus stop with weekday all-day service	98%	2%
Service area population	88%	12%

### Transit Amenities Monitoring

As defined by FTA Circular 4702.1B, *transit amenities* refer to items of comfort, convenience, and safety that are available to the general riding public. These include bus stop benches, bus shelters, route maps/schedules, and trash receptacles.

#### **Analysis**

Sun Metro's policy states that bus shelters are distributed on a system-wide basis. The location of bus shelters is determined by factors such as level of service, stability of routes within the service network, site dimensions, pavement characteristics, position of route, transfer points, stops shared by multiple routes, proximity to major destinations, distribution of shelters on route, legacy shelters, and shelter requests from customers and the community. There are approximately 628 bus shelters. Each bus shelter has a bench, nighttime lighting, trash receptacle, and bus route information (maps and schedules).

### **Transit Amenities Monitoring Results**

Not all of Sun Metro’s bus shelters are located on minority bus routes. There are approximately 454 bus shelters along minority routes, out of a total of 628 bus shelters within the service area.

### **Vehicle Assignment Monitoring**

As defined by FTA Circular 4702.1B, *vehicle assignment* refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider’s system.

### **Analysis**

Sun Metro is committed to maintaining a fleet until its buses reach their useful life age of 14 years. Sun Metro’s fleet consists of 154 active vehicles, which includes 35-foot, 40-foot, and 60-foot buses of various makes and models. Vehicles are not assigned to a specific route. Any vehicle type, old or new, may appear on any route at any time. However, articulated vehicles are specifically assigned to Sun Metro’s BRT line (BRIO) to accommodate higher ridership.

Table 4 lists vehicles by manufacturer, year, number of buses in fleet, and years in service.

**Table 3: Sun Metro’s Vehicle Fleet Information**

<b>Manufacturer</b>	<b>Manufactured Year</b>	<b>Number of Buses</b>	<b>Years in Service</b>
NABI	2007	6	18
NABI	2008	26	17
NABI	2010	7	15
New Flyer	2014	34	11
New Flyer	2017	2	8
New Flyer	2018	24	7
New Flyer	2020	12	5
New Flyer	2021	8	4
New Flyer	2023	12	2
New Flyer	2024	19	1
GLAVALs	2025	4	<1
<b>TOTAL</b>		<b>154</b>	<b>Average Age: 8</b>

### **Vehicle Assignment Results**

Vehicle Assignment Monitoring was conducted on September 2, 2025 during the peak period of 6:00 AM to 9:00 AM. Sun Metro’s vehicle (bus) numbers refer to the make and model year. For this evaluation, the Daily Vehicle Assignment report was used to determine which vehicle was assigned to each weekday route. Table 4 below shows the Daily Vehicle Assignment report revealed vehicles of all type and ages were placed on minority routes throughout Sun Metro’s service area. The vehicles are not assigned to specific routes or vehicles types to specific routes. Any vehicle type, old or new, may appear on any route at any time.

Table 4: Daily Vehicle Assignment Monitoring by Route for September 2, 2025

Route Number	Route	Minority Route	Block/Vehicle Number	Block/Vehicle Number	Block/Vehicle Number	Block/Vehicle Number	Block/Vehicle Number	TOTAL
4	Union Plaza Circulator	YES	401 / 24312	402 / 23301				2
7	Northeast / Eastside Terminal	NO	701 / 0931	702 / 0922	703 / 0917			3
10	Sunset Heights / UTEP	YES	1001 / 24107					1
14	Westwood	NO	1401 / 14419	1402 / 0905	1403 / 21304	1404 / 17301	1405 / 23305	5
15	Mesa	NO	1501 / 14418	1502 / 0907	1503 / 0914	1504 / 14418		3
19	Resler Circulator	NO	1901 / 24110	1902 / 24110				1
21	Chelmont via Reynolds	YES	2101 / 24311	2102 / 24311				1
24	Delta via Second Ward	YES	2401 / 23302	2402 / 23303				2
25	University Medical Center / Cielo Vista	YES	2501 / 24307					1
32	Five Points / Piedras / Fort Bliss	YES	3201 / 23310					1
33	Government Hill via Bassett Place	YES	3301 / 24104					1
34	Medical Center via Cliff	YES	3401 / 0916	3402 / 0929	3403 / 24302			3
35	Northgate via Dyer	YES	3501 / 14402	3502 / 14409				2
36	Beaumont Hospital / Highland	YES	3601 / 24304	3602 / 21301	3603 / 23309			3
43	Montalvo Park via Dyer	YES	4301 / 24313					1
44	Sean Haggerty via McCombs	YES	4401 / 23304					1
46	North Hills Circulator / Rushing	YES	4601 / 21306					1
50	Montana	YES	5001 / 14403	5002 / 24317				2
51	RC Poe via Edgemere	YES	5101 / 21303					1
52	RC Poe via Pebble Hills	YES	5201 / 24309					1
53	Bob Mitchell via Montanood	YES	5301 / 14411	5302 / 24316				2
58	Montana / Turner	YES	5801 / 24310					1
59	Eastside Connector	YES	5901 / 14420	5902 / 14413	5902 / 18698	5903 / 14416	5904 / 14406	5
60	Socorro / Zaragoza Bridge	YES	6001 / 14420	6002 / 0925				2
61	Ysleta via Alameda	YES	6101 / 14405	6102 / 0915				2
62	Govt District via Lakeside	YES	6201 / 23306	6202 / 23306				1
63	Mission Valley via Eastside Terminal	YES	6301 / 0698	6302 / 23309	6303 / 21301			3
65	Valle Verde via Poizano	YES	6501 / 0911	6502 / 0682				2
66	Valle Verde via North Loop	YES	6601 / 24318					1
67	Yarbrough	YES	6701 / 14412	6702 / 14412				1
68	Lee Trevino	YES	6801 / 0904					1
69	George Dieter	YES	6901 / 0685					1
72	Vista Del Sol	YES	7201 / 24303					1
74	Pellicano / Rojas	YES	7401 / 14404					1
86	Bordeaux via North Loop	YES	8601 / 23307	8602 / 0692				2
89	Zaragoza Bridge Circulator	YES	8901 / 0928	8901 / 0918				2
205	Mesa BRIO	NO	20501 / 14602	20502 / 14610	20503 / 18619	20504 / 18617	20505 / 14603	5
206	Alameda BRIO	YES	20601 / 20606	20602 / 20612	20603 / 18608	20604 / 18611	20605 / 18609	5
207	Dyer BRIO	YES	20701 / 18602	20702 / 20603	20703 / 18606	20704 / 18618	20705 / 20609	5
208	Montana BRIO	YES	20801 / 18607	20802 / 23601	20805 / 20614	20806 / 20611		4
								83

Source: Sun Metro Operations Division

### Vehicle Assignment Results

Vehicle Assignment Monitoring was conducted on September 1, 2025 during the peak period of 6:00 AM to 9:00 AM. Table 4 above shows the Daily Vehicle Assignment report revealed vehicles of all type and ages were placed on minority routes throughout Sun Metro’s service area. The vehicles are not assigned to specific routes or vehicles types to specific routes. Any vehicle type, old or new, may appear on any route at any time.

### Summary of Monitoring Results

A summary of the results of each evaluation is shown in Table 5 below. No disparate impacts to minority populations were identified in these evaluations.

**Table 5: Summary of Results**

Standard	Minority Results
Vehicle Load	No Disparate Impact
Vehicle Headway	No Disparate Impact
On-Time Performance	No Disparate Impact
Service Availability	No Disparate Impact
Transit Amenities	No Disparate Impact
Vehicle Assignment	No Disparate Impact

#### 4. [Evaluate Service and Fare Changes](#)

##### **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 allow 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:

- 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;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- 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.

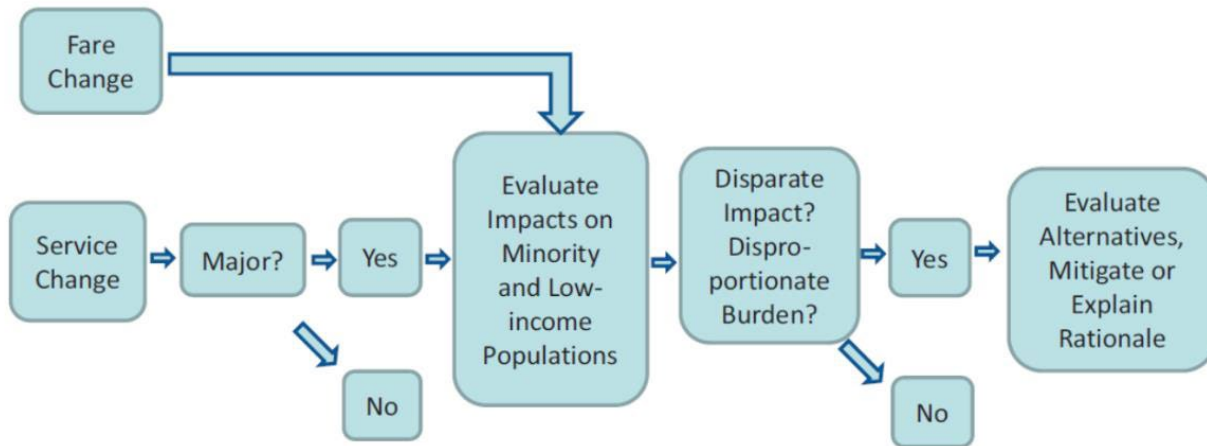
### **References**

**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**

The chart depicted below explains the process of when to evaluate the impacts of a fare change or service change. In addition, the second chart explains the type of analysis required, depending on the populations affected by the fare and/or service change.



### Title VI-Related 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.

### **Major Service Change Policy**

All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to MTDB 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 MTB.

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 Department Board. All presentations will be notated for future reference.

The following service modifications occurred during the 2023-2025 time period and were exempt from conducting a major analysis:

- February 19, 2023
- July 30, 2023
- August 13, 2023
- February 11, 2024
- October 6, 2024

On February 11, 2025, an explosion resulting in a fire severely impacted Sun Metro's maintenance operations, leading to a temporary reduction in service to comply with federal vehicle maintenance regulations. Following the incident, Sun Metro adjusted its operations to ensure compliance with federal transit safety regulations, which require systematic inspections, preventative maintenance, and repairs to maintain buses in safe operating conditions.

Since the fire, Sun Metro has operated all Brio routes on a modified schedule and most fixed routes on a Sunday/Holiday schedule. This modified schedule was in effect until February 22, 2025. Sun Metro set-up temporary maintenance operations at the Union Depot in Downtown El Paso to service vehicles.

No fare changes occurred during the 2023-2025 time period.

# Grants, Reviews, and Certifications

## Pending FTA Grants

- 2025 Rebuilding American Infrastructure with Sustainability and Equity (RAISE – USDOT)
- 2024 Section 5310: Enhanced Mobility of Seniors and Individuals with Disabilities (Pass through from local MPO)
- TX-2025-036-01-00: Sun Metro Paratransit Fleet Replacement – Zero Emission Vehicles
- 1539-2024-6-P1: FY2024, 5339 Low/No Emission Competitive Program, Capital Rolling Stock Replacement
- 1539-2024-3-P1: El Paso Sun Metro Micro Transit Project
- 1539-2024-2-P1: 2026 Bike Plan – BRIO First-Last Mile Update

## Pending Application for Financial Assistance

Sun Metro does not have any pending applications for financial assistance from any federal agency other than the FTA.

## Open FTA Grants

- TX-2022-020: Ride Sun Metro Contactless Payment Project
- TX-2024-004: Sun Metro Rising – American Rescue Plan (ARP) Act, 5307 FY21 Planning
- TX-2022-010: El Paso Sun Metro FY20 Competitive HOPE (5305) Program Feasibility Study and Alternatives Analysis for Regional Fare Structure and Payment System
- TX-03-0307: El Paso Dyer Corridor RTS
- TX-03-0308: El Paso Dyer Corridor RTS
- TX-04-0099: Mesa Corridor BRT/RTS project
- TX-2017-033: FY15 & FY16 5339 Bus & Facility Funding
- TX-2017-048: FY15-FY16 5307 Formula Funding Grant
- TX-2018-036: FY17 5339 Bus & Facilities Apportionment - 1539
- TX-2020-024: El Paso Sun Metro FY18 5339
- TX-2020-032: El Paso Sun Metro CIG Funding Montana BRT/RTS Corridor
- TX-2020-052: Sun Metro El Paso (1539) FY 20 5307 Planning and Capital Items
- TX-2020-099: El Paso Sun Metro FY19 & FY20 5339 Vehicle Purchases
- TX-2022-071: El Paso Sun Metro FY21 5339 Capital Funding
- TX-2023-105: El Paso Sun Metro FY22 Formula 5307 Planning, ADA Paratransit Service, and Capital Items
- TX-2023-107: El Paso Sun Metro FY21 5307 Planning, ADA Paratransit Service, and Capital Items
- TX-2024-015: El Paso Sun Metro FY22 5339 Capital Funding (Stations, Stops, Terminals; Support Equip; Bus Assoc. Transit Improv.)
- TX-2024-020: El Paso Sun Metro Montana RTS (BRT) Operating Assistance- FY23 CMAQ

- TX-2024-067: El Paso Sun Metro FY23 5307 Planning, ADA Paratransit Service, Buses, and Other Capital Items
- TX-2024-087: El Paso Sun Metro FY23 5339 Capital Funding
- TX-39-0009: El Paso Dyer Corridor RTS

### **Civil Rights Compliance Reviews in the Past 3 Years**

The last Civil Rights compliance review was conducted with Sun Metro’s Triennial Review, which concluded in February 2024.

### **Recent Annual Certifications and Assurances**

Completed on May 29, 2025

### **Previous Triennial Review Findings**

No deficiencies were found with the FTA requirements for Title VI.

## **Contact**

For additional information on Sun Metro's Title VI Program 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:

Jerry DeMuro, Deputy Transit Officer  
Sun Metro  
10151 Montana Ave  
El Paso, Texas 79925  
(915) 212-3333  
DeMuroG@elpasotexas.gov

## **Appendix**

- A. Sun Metro Discrimination Complaints Process Policy
- B. Title VI/LEP Training PPT
- C. Fire Incident Press Releases
- D. Mass Transit Department Board Meeting Minutes
- E. Sun Metro Certifications & Assurances

## Appendix A. Sun Metro Discrimination Complaints Process Policy



## Discrimination Complaints Process

The City of El Paso – Sun Metro does not promote or tolerate discrimination. Sun Metro has established a process through which allegations of discrimination are investigated and resolved.

### Complaint Submission

If someone believes they have suffered from discrimination (includes race, color, sex, national origin, age, disability, religion, or genetic information) under a Sun Metro program of transit service delivery or related benefits, they may contact Sun Metro to seek an informal resolution. If the matter cannot be resolved informally, the following steps will be utilized:

- Within 180 days of the alleged discrimination, complainants may submit a written or verbal complaint to Sun Metro. Complaints must include the complainant's name (can also be listed as anonymous), the nature of the complaint, the date of the alleged discrimination, requested action, and contact information.
- Complainants may submit a complaint in-person, by mail or over-the-phone with:

**Sun Metro**  
**Attn: Customer Service – Nondiscrimination**  
**10151 Montana Ave.**  
**El Paso, TX 79925**  
**(915) 212-3333**

If a complainant prefers to submit a complaint by e-mail, the complainant may call Sun Metro at (915) 212-3333, and an appropriate e-mail address will be provided.

Complainants may also file a complaint with the FTA Office of Civil Rights:

**Email:** [FTACivilRightsCommunications@dot.gov](mailto:FTACivilRightsCommunications@dot.gov)  
(with "FTA complaint form" in the subject line)

**U.S. Mail:** Federal Transit Administration  
Office of Civil Rights  
Attn: Complaint Team  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Ave., SE  
Washington, D.C. 20590

**Phone:** 1-888-446-4511



- If a complainant has a disability, the complainant may obtain information about the complaint process in alternative formats such as large print, audio, or accessible electronic formats.
- If a complainant has limited English proficiency, the complainant may obtain information about the complaint process by requesting a qualified foreign language interpreter and information written in other languages to ensure meaningful access to programs and activities. If a complainant requires these services, they may contact:

David Garcia  
Business and Customer Service Assistant Manager  
[GarciaDX3@elpasotexas.gov](mailto:GarciaDX3@elpasotexas.gov)  
(915) 212-3333

### Complaint Review and Processing

- Sun Metro will review each complaint and may request additional information from the complainant as needed. If additional information is requested and not received, the complaint may be closed. The complaint may also be closed if the complainant no longer wishes to pursue the complaint.
- Complaints will be recorded in an electronic log maintained by Sun Metro containing the complainant's contact information, nature of the complaint, date of submission, and results of the investigation. Log will be retained on an ongoing basis, and will not be purged. Information contained in log will be considered confidential and it will be stored on the City's network with access limited to Sun Metro staff designated by the Director.
- Any complaint received within the jurisdiction of Sun Metro will be promptly and impartially investigated. Sun Metro's goal is to initiate an investigation of all complaints within 25 days of receipt, though the time to carefully investigate complaints may be longer depending on the nature and complexity of the complaint.
- Note: When possible, every effort will be made to resolve a complaint informally. In a case where an informal accommodation may be made to complainant, the complainant may choose to withdraw the complaint, and the complaint will be closed and the withdrawal recorded in the log.

### Complaint Investigation

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. Sun Metro will review every complaint and assign a neutral party to investigate. Neutral shall mean an individual employed by Sun Metro not assigned to the



particular operation in question, or a qualified individual not employed by Sun Metro. At a minimum, the investigating officer will:

- Identify and review all relevant documents, practices, and procedures;
- Identify persons with knowledge of the complaint, including but not limited to the complainant, witnesses, or any person identified by the complainant, or who may have been subject to similar activity, and provide an invitation to be interviewed in person or by phone; and
- Sun Metro will inquire whether the complainant has filed the complaint with another agency, such as FTA Office of Civil Rights, to prevent duplicative investigations. If the complainant has submitted a duplicate complaint, Sun Metro will contact the relevant agency to cooperate and coordinate with in the investigation.

Upon completion of the investigation, Sun Metro will complete a final report summarizing the findings for the Director of Mass Transit. If a civil rights violation is found to exist, remedial steps as appropriate and necessary, will be implemented. The complainant will receive a final report, that identifies any remedial actions implemented by Sun Metro in accordance with City policies and procedures. The investigation process and final report is expected to be completed within 45 days of receipt, unless exceptional circumstances warrant an extended investigation and reporting period.

## Public Notice

Sun Metro will ensure notice is posted at all transit center locations, informing the public of its nondiscrimination policy and how to submit a complaint. The notice will also be posted in Spanish, in order to accommodate persons with limited English proficiency.

Appendix B: Title VI/LEP Training PPT



CITY OF EL PASO

# Sun Metro Title VI Training

*Last Updated January 23, 2025*

# What is Title VI?

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs or activities that receive Federal financial assistance.

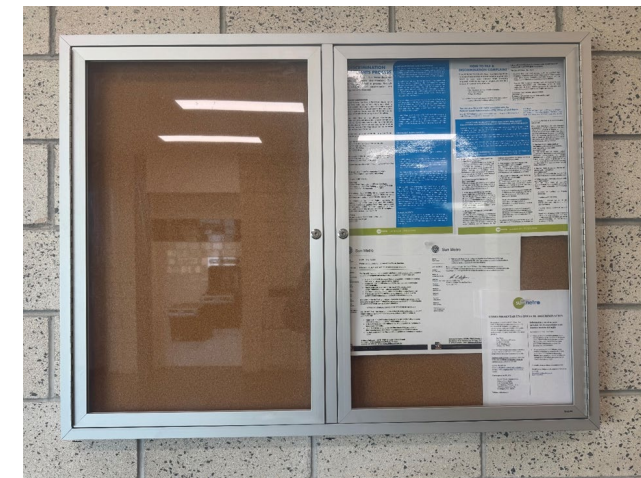
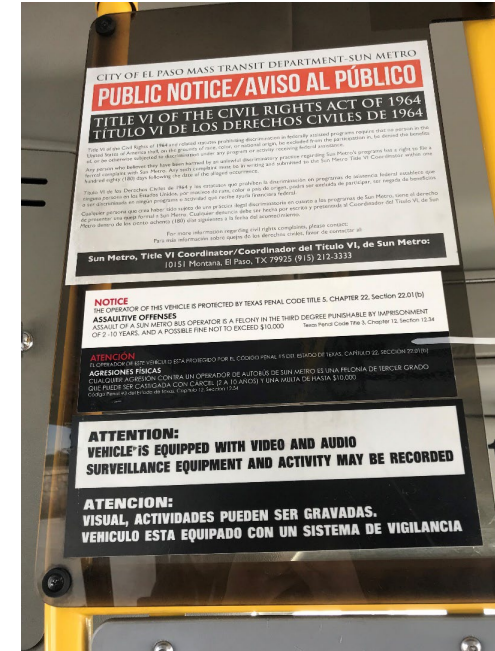
In addition to Title VI, Sun Metro also prohibits discrimination based on sex, age, disability, religion or any other protected classes as described in State or Federal laws. For the purpose of this training, Title VI is the main focus.

# Why is Title VI Important?

- Ensures that public services, including transportation, are provided in a nondiscriminatory manner.
- Requires opportunities for public participation in decision-making without regard to race, color, or national origin, including populations with Limited English Proficiency (LEP).
- Title VI non-compliance can cause federal funding to be conditioned or withheld.

# Notice to Beneficiaries

- Sun Metro is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI.
- Notice regarding Sun Metro's Civil Rights Policy has been disseminated throughout the bus and streetcar systems in both English and Spanish.
- The materials include posters displayed at transit terminals, printed and digital notifications on revenue vehicles, as well as on Sun Metro's website.



# Complaint Form

Sun Metro has established a process for system users 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 may fill out a complaint form. Forms are available on Sun Metro's website.

# Complaint Form (cont'd)



**Discrimination Complaint Form**  
Formulario de Reclamo por Discriminación

Name (Nombre) \_\_\_\_\_  
 Address (Dirección) \_\_\_\_\_  
 City (Ciudad) \_\_\_\_\_ State (Estado) \_\_\_\_\_ Zip (Código Postal) \_\_\_\_\_  
 Telephone (Teléfono): Home (Casa) \_\_\_\_\_ Work (Trabajo) \_\_\_\_\_  
 Cell (Celular) \_\_\_\_\_  
 Email address (Correo electrónico) \_\_\_\_\_

Basis of Complaint: Mark all that applies.  
(Fundamento(s) del reclamo: Marque todo lo que corresponda):

- Race (Raza)
- Color (Color)
- National Origin (Nacionalidad)
- Disability (Discapacidad)
- Sex (Sexo)
- Age (Edad)

How were you allegedly discriminated against? (¿Cómo ocurrió el presunto acto de discriminación?)

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Who allegedly discriminated against you?  
(¿Quién considera usted que ejerció discriminación contra usted?)

Name of Organization (Nombre de la organización) \_\_\_\_\_  
 Address (Dirección) \_\_\_\_\_  
 City (Ciudad) \_\_\_\_\_ State (Estado) \_\_\_\_\_ Zip (Código Postal) \_\_\_\_\_  
 Telephone (Teléfono): \_\_\_\_\_

Where did the alleged discrimination occur? (¿Dónde ocurrió el presunto acto de discriminación?)

\_\_\_\_\_  
 \_\_\_\_\_

Date/s and times discrimination occurred  
(Fecha(s) y hora (s) cuando ocurrió (ocurrieron) el (los) presunto(s) acto (s) de discriminación)

\_\_\_\_\_

First time (Primera Vez) \_\_\_\_\_  
 Second time (Segunda Vez) \_\_\_\_\_  
 Third time (Tercera Vez) \_\_\_\_\_

Were there any other witnesses to the alleged discrimination?  
(¿Hubo testigos del presunto acto de discriminación?)

Name (Nombre)	Work Telephone (Teléfono del trabajo)	Home Telephone (Teléfono de la casa)	Cell Telephone (Teléfono celular)

What can the Department do to resolve the complaint?  
(¿Qué podemos hacer para solucionar esta queja?)

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Have you already filed this or other complaint before?  
(¿Había presentado usted la misma o cualquier otra queja antes?)

Who? (¿Con quién?) \_\_\_\_\_  
 When? (¿Cuándo?) \_\_\_\_\_

Complaint number, if known (Número de caso, si lo sabe) \_\_\_\_\_

Signature (Firma) \_\_\_\_\_ Date (Fecha) \_\_\_\_\_

Mail to: Title VI Coordinator  
 Envíelo a: 10151 Montana Avenue  
 El Paso, TX 79925-1515



# Active Lawsuits, Complaints or Inquiries Alleging Discrimination

Currently, there are no complaints pending that allege discrimination on the grounds of race, color, national origin or any other form of discrimination.

# Sun Metro's Public Participation Plan

Sun Metro uses the El Paso Metropolitan Planning Organization's Public Participation Program, which was revised September 20, 2024 and is available at:

<https://www.elpasompo.org/media/PublicParticipationPlan/PublicParticipationPlan.pdf>

The plan incorporates the following outreach efforts which help alert riders and encourage engagement:

- Newspapers and other periodicals
- Bus and bus shelter advertisements
- Website
- Social Media
- Public Hearings/Public Information Sessions

# Public Comments

All comments received through the public participation plan are given careful, thoughtful consideration. Due to a number of different ways system users 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 Department Board for consideration.

# Construction Equity Analysis

Sun Metro prepares advanced planning reports prior to the construction of transit-related facilities. This includes:

- Transit Terminal Demand Analysis: review of service improvements.
- Transit Terminal Site Selection Analysis: research and collection of demographic data.
- Environmental Assessment: determine any environmental consequences and investigates solutions to mitigate any negative impacts.

# Title VI Equity Analysis Policies and Procedures

The Federal Transit Administration (FTA) requires Sun Metro to adopt Title VI Equity Analysis Policies. These include:

- 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.

# Title VI Equity Analysis Policies and Procedures (cont'd)

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.”

# Major Service Change Policy

- All major increases or decreases in transit service are subject to a Title VI Equity Analysis and must be presented to the Sun Metro Mass Transit Department Board (MTDB).
- 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.

# Disparate Impact Policy

According to the FTA, ***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.

Sun Metro's policy establishes a ***25 percent*** threshold for determining whether a given action has a disparate impact on minority populations.

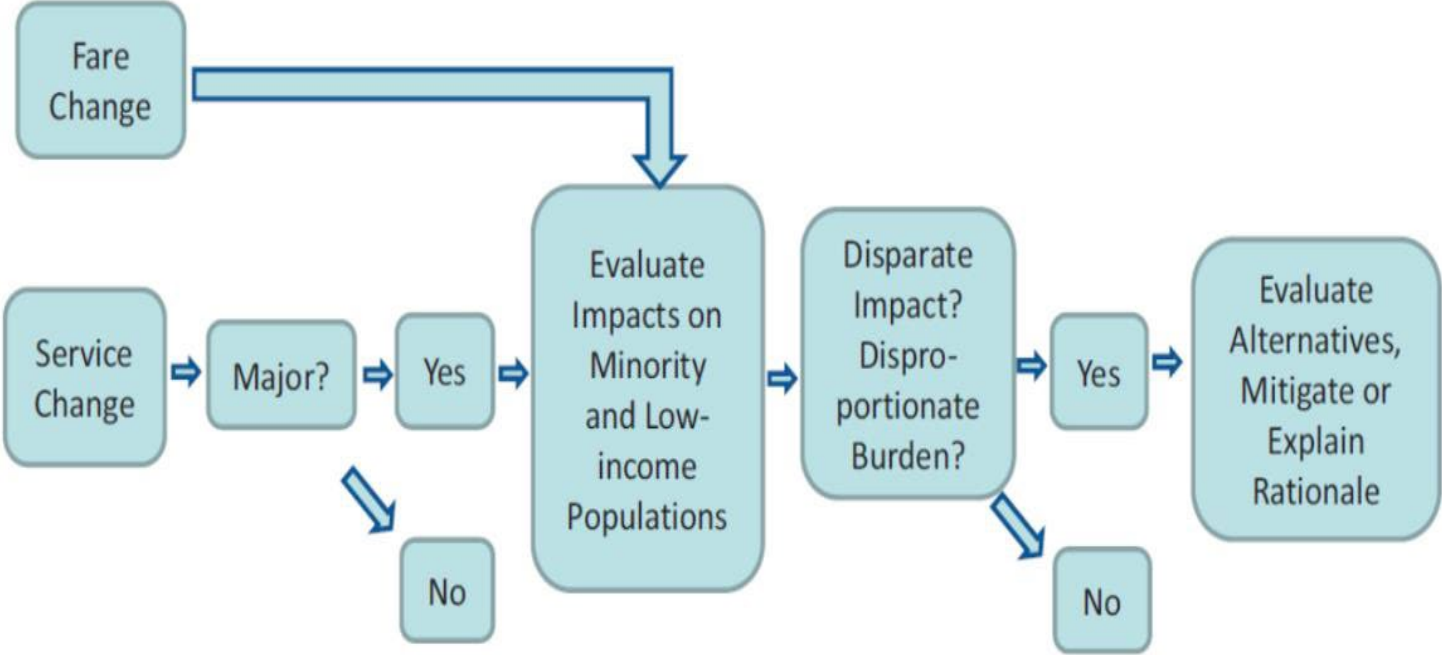
# Disproportionate Burden Policy

According to the FTA, *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.

Sun Metro's policy establishes a **25 percent** threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations.

# Service and Fare Change Process

The following chart depicts the overall process to conduct a fare or service change.





CITY OF EL PASO

# Limited English Proficiency (LEP)

# What Does LEP Mean?

- English is **not** the primary language.
- Limited ability to read, speak, write, or understand English.
- LEP individuals are among the most transit-dependent, but they are also choice riders.
- Outreach to dependent communities is a way to increase ridership without adding service or increasing fares.

# Executive Order 13166

“Improving Access to Services for Persons with Limited English Proficiency” requires each federal agency to:

- Examine the services it provides;
- Develop and implement a system by which LEP persons can meaningfully access those services;
- Ensure that recipients of federal financial assistance provide meaningful access to their LEP beneficiaries.

# El Paso County Population

Total Population: 865,657

Total Population of LEP Individuals: 27%

Speak English Less Than "Well"	El Paso County, Texas Estimate
Spanish or Spanish Creole	229,152
German	828
Korean	867
Chinese	775
Arabic	450
Tagalog	531
French (incl. Patois, Cajun)	276
Other Indic Languages	272
Japanese	176
Vietnamese	351
Other Asian Languages	213
Other Pacific Island Languages	158
Persian	247
Gujarati	101
Italian	82
Urdu	102
Thai	29
Hindi	7
Mon-Khmer (Cambodian)	38
Portuguese or Portuguese Creole	39
Other Native North American Languages	23
French Creole	29
Russian	100
Greek	9
Hebrew	21
Polish	5
Laotian	0
Other Slavic Languages	11
Armenian	14
Other West Germanic Languages	0
Hungarian	22
African Languages	90
Hmong	0
Navajo	15
Other and Unspecified Languages	10
Other Indo-European Languages	15
Scandinavian Languages	0
Serbo-Croatian	128
Yiddish	0

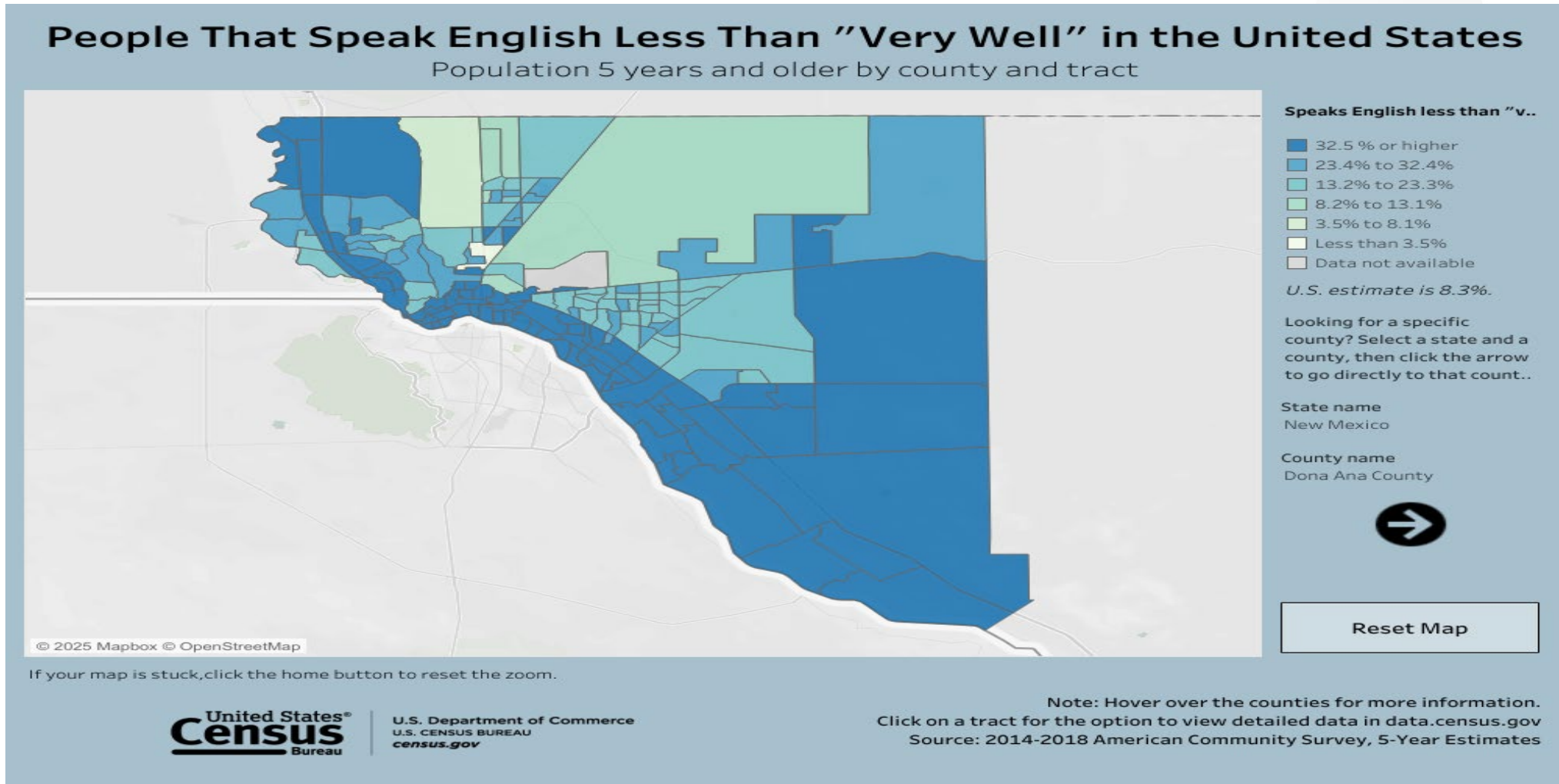
U.S. Census 2015: American Community Survey 5-Year Estimate Data

# The LEP Community

While the need to provide language services to the Spanish-speaking population in the Sun Metro service area is crucial, it is also helpful to understand where populations of limited English proficiency reside.

The following map provides a spatial display of residents who report speaking English “less than well.”

# The LEP Community



# Language Assistance

- If the person can speak some English, try to discern their needs without the help of language service;
- If the employee cannot effectively communicate with the person, refer the individual to the Title VI Notice, where they can obtain Sun Metro's Customer Service number for further assistance.

# 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:

Jerry DeMuro  
Title VI Liaison  
Sun Metro  
10151 Montana Ave  
El Paso, Texas 79925  
(915) 212-3470

[DeMuroG@elpasotexas.gov](mailto:DeMuroG@elpasotexas.gov)



CITY OF EL PASO

Questions?

# Quiz: Question #1

What does Title VI protect?

- Race
- Color
- National Origin
- All of the Above

# Quiz: Question #1

What does Title VI protect?

- Race
- Color
- National Origin
- All of the Above*

# Quiz: Question #2

Where can an individual access the Title VI Complaint Form?

- On the bus
- City Hall
- Sun Metro's website
- Local police station

# Quiz: Question #2

Where can an individual access the Title VI Complaint Form?

- On the bus
- City Hall
- Sun Metro's website*
- Local police station

# Quiz: Question #3

If an individual speaks English “less than well,” they are considered to be LEP. What does this acronym stand for?

- Limited Educational Possibilities
- Limited English Proficiency
- Limited Excellence in Professionalism
- Limited English Person

# Quiz: Question #3

If an individual speaks English “less than well,” they are considered to be LEP. What does this acronym stand for?

- Limited Educational Possibilities
- Limited English Proficiency*
- Limited Excellence in Professionalism
- Limited English Person

# Quiz: Question #4

What qualifies as a Major Service Change?

- 30% reduction in bus service
- 10% increase in bus service
- 5% reduction in bus service
- All of the above

# Quiz: Question #4

What qualifies as a Major Service Change?

- 30% reduction in bus service*
- 10% increase in bus service
- 5% reduction in bus service
- All of the above

## Appendix C: Sun Metro Fire Incident Press Releases



**MAYOR**  
Renard U. Johnson

**CITY MANAGER**  
Dionne Mack

**CITY COUNCIL**

**District 1**  
Alejandra Chávez

**District 2**  
Dr. Josh Acevedo

**District 3**  
Deanna M. Rocha

**District 4**  
Cynthia Boyar Trejo

**District 5**  
Ivan Niño

**District 6**  
Art Fierro

**District 7**  
Lily Limón

**District 8**  
Chris Canales

**NEWS  
RELEASE**

02/ 19/ 2025

# Sun Metro to Restore Service to Near Standard Level to Better Serve El Paso Service Modifications Begin February 23, 2025

**EL PASO, Texas**—Sun Metro will expand service beginning on Sunday, February 23, 2025, by adding more routes, extending hours and increasing frequency, as part of ongoing efforts to restore bus service following a fire at its Transit Operations Center.

The current modified service schedule will remain in effect until Saturday, February 22, 2025.

“The restoration of these additional routes increase current service from 11 routes to 48 routes out of the 52 routes Sun Metro normally operates during weekdays,” said Sun Metro Director Anthony DeKeyzer. “This expansion will improve access to jobs, schools, medical care, and other essential services. We appreciate our passengers’ patience and understanding as we continue working toward full service restoration.”

On February 11, 2025, a fire severely impacted Sun Metro’s maintenance operations, leading to a temporary reduction in service to comply with federal vehicle maintenance regulations. Tragically, five Sun Metro employees were hospitalized due to the incident, and one later succumbed to his injuries. The cause of the fire remains under investigation.

Following the incident, Sun Metro adjusted its operations to ensure compliance with federal transit safety regulations, which require systematic inspections, preventive maintenance, and repairs to maintain buses in safe operating conditions.

Since the fire, Sun Metro has operated:

- All Brio routes on a modified schedule
- Most fixed routes on a Sunday/Holiday schedule
- Amistad routes on their regular schedule

This modified schedule will remain in effect through Saturday, February 22, 2025.

Sun Metro has set up temporary maintenance operations at the Union Depot in Downtown to service vehicles.

## Upcoming Service Modifications

Regular Sunday service starts Sunday, February 23, and Monday, February 24, 2025, Sun Metro will introduce a Modified Weekday and Saturday Schedule, gradually increasing service levels:

- Sunday, February 23, 2025 – Regular Sunday schedule resumes
- February 24 - 28, 2025 – Modified Weekday Schedule starts
- Saturday, March 1, 2025 – Modified Saturday Schedule starts

## Routes Returning on February 24, 2025

Modified Weekday Schedule (Effective Monday, February 24)

*Please note: Routes 2, 16, 25, and 60 will not operate under this schedule.*

—more—



Promoting **Transparent & Consistent Communication**  
Among All Members of the Community

**Media Contact:** Laura Cruz Acosta  
Cruz-AcostaLA@elpasotexas.gov  
915.212.1071



**MAYOR**  
Renard U. Johnson

**CITY MANAGER**  
Dionne Mack

**CITY COUNCIL**

**District 1**  
Alejandra Chávez

**District 2**  
Dr. Josh Acevedo

**District 3**  
Deanna M. Rocha

**District 4**  
Cynthia Boyar Trejo

**District 5**  
Ivan Niño

**District 6**  
Art Fierro

**District 7**  
Lily Limón

**District 8**  
Chris Canales

<b>Route</b>	<b>Service Area</b>	<b>Operating Hours</b>	<b>Frequency</b>
Route 4	Union Plaza Circulator	6:15 AM – 7:13 PM	60 min
Route 7	Northeast/Cielo Vista TC	4:25 AM – 7:30 PM	50 min
Route 10	Sunset Heights/UTEP	5:45 AM – 7:20 PM	50 min
Route 14	Westwind	5:35 AM – 7:40 PM	50 min
Route 15	Mesa	4:55 AM – 8:30 PM	70 min
Route 19	Resler Circulator	5:00 AM – 8:05 PM	65 min
Route 21	Chelmont Via Raynolds	5:15 AM – 6:45 PM	70 min
Route 24	Delta Via Second Ward	5:00 AM – 8:10 PM	80 min
Route 32	5 Points/Piedras/Ft Bliss	5:30 AM – 7:28 PM	45 min
Route 33	Government Hill Via Bassett	4:35 AM – 7:50 PM	80 min
Route 34	Medical Center Via Cliff	5:05 AM – 7:05 PM	90 min
Route 35	5 Points via Dyer	5:05 AM – 8:40 PM	55 min
Route 36	Beaumont Hospital/Highland	5:52 AM – 7:40 PM	110 min
Route 43	Montalvo Park Via Dyer	4:30 AM – 7:30 PM	60 min
Route 44	Sean Haggerty Via McCombs	5:20 AM – 7:17 PM	80 min
Route 46	North Hills Circulator/Rushing	5:08 AM – 7:38 PM	60 min
Route 50	Montana	5:00 AM – 8:00 PM	60 min
Route 51	RC Poe Via Edgemere	5:45 AM – 7:00 PM	100 min
Route 52	RC Poe Via Pebble Hills	6:00 AM – 6:40 PM	120 min
Route 53	Bob Mitchell via Montwood	5:30 AM – 8:38 PM	70 min
Route 58	Route 58 Montana/Turner	4:40 AM – 7:35 PM	65 min
Route 59	Eastside Connector	4:45 AM – 8:01 PM	15 min
Route 61	Route 61 DTC Via Alameda	4:10 AM – 7:23 PM	75 min
Route 62	Govt District Via Lakeside	5:52 AM – 7:58 PM	90 min
Route 63	Mission Valley via Eastside Terminal	5:28 AM – 7:28 PM	60 min
Route 65	Valle Verde via Paisano	5:10 AM – 8:07 PM	45 min
Route 66	Valle Verde via North Loop	5:00 AM – 7:16 PM	90 min
Route 67	Yarbrough	5:29 AM – 8:09 PM	77 min
Route 68	Lee Trevino	5:21 AM – 7:35 PM	90 min
Route 69	George Dieter	5:10 AM – 8:45 PM	90 min
Route 72	Vista Del Sol	6:45 AM – 8:10 PM	90 min

—more—



Promoting **Transparent & Consistent Communication**  
Among All Members of the Community

**Media Contact:** Laura Cruz Acosta  
Cruz-AcostaLA@elpasotexas.gov  
915.212.1071



**MAYOR**  
Renard U. Johnson

**CITY MANAGER**  
Dionne Mack

**CITY COUNCIL**  
District 1  
Alejandra Chávez

District 2  
Dr. Josh Acevedo

District 3  
Deanna M. Rocha

District 4  
Cynthia Boyar Trejo

District 5  
Ivan Niño

District 6  
Art Fierro

District 7  
Lily Limón

District 8  
Chris Canales

Route	Service Area	Operating Hours	Frequency
Route 74	Pellicano/Rojas	5:30 AM – 8:28 PM	90 min
Route 86	Bordeaux via North Loop	5:45 AM – 7:43 PM	60 min
Route 89	Zaragoza Bridge Circulator	4:40 AM – 8:00 PM	30 min
Route 205	Mesa BRIO	5:00 AM – 7:55 PM	20 min
Route 206	Alameda BRIO	5:00 AM – 7:55 PM	30 min
Route 207	Dyer BRIO	5:00 AM – 7:55 PM	30 min
Route 208	Montana BRIO	5:00 AM – 7:43 PM	30 min

**Amistad Routes (Regular Weekday Schedule Continuing)**

Route	Service Area	Operating Hours	Frequency
Route 5	Far East/Eastside Terminal Express	5:00 AM – 8:55 PM	80 min
Route 6	Far East/Mission Valley Express	5:30 AM – 8:33 PM	80 min
Route 8	Gateway Circulator	5:30 AM – 8:05 PM	60 min
Route 11	Mesita via Kern Place	8:00 AM – 4:55 PM	45 min
Route 12	Doniphan Circulator	5:00 AM – 8:03 PM	55 min
Route 13	Coronado Hills Circulator	5:55 AM – 7:48 PM	50 min
Route 26	Five Points/Alameda Express	6:00 AM – 6:56 PM	30 min
Route 54	RC Poe via Montwood	5:25 AM – 8:45 PM	50 min
Route 56	RC Poe/Far East Circulator	6:20 AM – 7:02 PM	45 min
Route 90	Westside/Eastside Express	5:50 AM – 7:30 PM	45 min

**Modified Saturday Schedule (Effective Saturday, March 1)**

Routes 14, 15, 19, 35, 43, 44, 50, 51, 52, 53, 59, 61, 62, 63, 65, 66, 68 and 89 will run on a modified schedule. *Please note: Routes 2, 25, and 60, will not operate under this schedule.*

*Routes 4, 7, 10, 21, 24, 32, 33, 34, 36, 46, 58, 67, 69, 72, 74, 86, and Brios will be running on regular Saturday Schedule.*

**Sunday Schedule (Effective Sunday, February 23)**

Regular Sunday service resumes.

**Stay Updated**

Passengers are encouraged to plan ahead and check for service updates via:

Sun Metro’s Customer Service Center (915) 212-3333

[www.SunMetro.net](http://www.SunMetro.net)

Facebook & X (@SunMetroEP)

For more information, visit [www.SunMetro.net](http://www.SunMetro.net) or follow us on social media for real-time updates.

###



Promoting **Transparent & Consistent Communication**  
Among All Members of the Community

**Media Contact:** Laura Cruz Acosta  
Cruz-AcostaLA@elpasotexas.gov  
915.212.1071



**MAYOR**  
Renard U. Johnson

**CITY MANAGER**  
Dionne Mack

**CITY COUNCIL**

**District 1**  
Alejandra Chávez

**District 2**  
Dr. Josh Acevedo

**District 3**  
Deanna M. Rocha

**District 4**  
Cynthia Boyar Trejo

**District 5**  
Ivan Niño

**District 6**  
Art Fierro

**District 7**  
Lily Limón

**District 8**  
Chris Canales

**NEWS  
RELEASE**

02/ 12/ 2025

# City of El Paso Update on Fire at Sun Metro Transit Operations Center

## Transit Service Adjustments to Support the Community

**EL PASO, Texas**—The City of El Paso and Sun Metro are responding to a fire that occurred on Tuesday at the Sun Metro Transit Operations Center (TOC), 10151 Montana Avenue.

The incident remains under investigation. The fire resulted in injuries to eight individuals—five were transported to area hospitals, while three declined medical transportation. Of those hospitalized, two are in critical condition and have been flown to a burn center in Phoenix.

“Our priority right now is ensuring the well-being of our employees and maintaining critical transit services for our community,” said City Manager Dionne Mack. “We appreciate the patience of our riders as we work to restore operations safely.”

### Incident Investigation and Response

The El Paso Fire Department is continuing to investigate the cause of the fire. Sun Metro is working closely with emergency responders and city officials to assess the damage and determine next steps for restoring full operations.

“We understand that the public and the media have many questions, and we are committed to providing answers. However, at this time, we ask for patience as we focus on supporting our staff and stabilizing operations,” said Sun Metro Director Anthony Dekeyzer.

### Support for Employees

The City is providing support to affected employees, including access to medical care, counseling, and assistance with accommodations as needed.

### Press Briefing Scheduled for Tomorrow

**Sun Metro will host a press briefing at 1 p.m. Thursday, February 13, 2025, at the Transit Operations Center, 10151 Montana to provide additional updates.**

*Please note:* At this time, our focus remains on assisting staff and maintaining transit operations.

### Transit Service Adjustments

Sun Metro recognizes that for many in our community, public transit is their primary or only means of transportation.

In response to the incident, we have been evaluating operations to determine how to best serve riders while managing available resources.

At this time, most fixed routes will operate on a Sunday/Holiday schedule to maintain essential transit services.

However, to better support the community, we are making the following modifications to key routes to ensure students and commuters can reach schools and workplaces:

—more—



Promoting **Transparent & Consistent Communication**  
Among All Members of the Community

**Media Contact:** Laura Cruz Acosta  
Cruz-AcostaLA@elpasotexas.gov  
915.212.1071



**MAYOR**  
Renard U. Johnson

**CITY MANAGER**  
Dionne Mack

**CITY COUNCIL**

**District 1**  
Alejandra Chávez

**District 2**  
Dr. Josh Acevedo

**District 3**  
Deanna M. Rocha

**District 4**  
Cynthia Boyar Trejo

**District 5**  
Ivan Niño

**District 6**  
Art Fierro

**District 7**  
Lily Limón

**District 8**  
Chris Canales

**Modified Sunday Schedule for Key Routes:**

- Route 205 (Mesa BRIO) – Service begins at 6 AM with a 20-minute frequency.
- Route 206 (Alameda BRIO) – Service begins at 6 AM with a 25-minute frequency.
- Route 207 (Dyer BRIO) – Service begins at 6 AM with a 25-minute frequency.
- Route 208 (Montana BRIO) – Service begins at 6 AM with a 30-minute frequency.
- Route 59 (Eastside Connector) – First bus departs 6:04 AM from DTC, with a 28-minute frequency.

Additionally, routes serviced by our community partner, Amistad, will continue to operate on their regular schedules. These routes include:

- Rt. 5 – Far East/Eastside Transfer Center Express
- Rt. 6 – Far East/Mission Valley Transfer Center Express
- Rt. 8 – Gateway Circulator
- Rt. 11 – Mesita via Kern Place
- Rt. 12 – Doniphan Circulator
- Rt. 13 – Coronado Hills Circulator
- Rt. 26 – 5 Points/Alameda Express
- Rt. 54 – RC Poe via Montwood
- Rt. 56 – RC Poe/Far East Circulator
- Rt. 90 – Park-N-Ride Westside to Eastside Express

Riders are encouraged to plan ahead and check for service updates via Sun Metro's website [sunmetro.net](http://sunmetro.net) and social media platforms.

In response to the recent events, Sun Metro has been evaluating operations to determine how to best serve riders while managing available resources.

For the latest updates, please visit [www.SunMetro.net](http://www.SunMetro.net) or follow us on [Facebook](#) or [X](#).

###



Promoting **Transparent & Consistent Communication**  
Among All Members of the Community

**Media Contact:** Laura Cruz Acosta  
Cruz-AcostaLA@elpasotexas.gov  
915.212.1071

Appendix D: Mass Transit Department Board Meeting Minutes

January 6, 2026



**MASS TRANSIT DEPARTMENT BOARD MINUTES  
CITY COUNCIL CHAMBERS  
JANUARY 6, 2026**

A meeting of the Mass Transit Department Board was called to order at 11:31 a.m. Board Chair Renard Johnson was present and presiding and the following Board Members answered roll call: Alejandra Chávez, Josh Acevedo, Deanna Maldonado-Rocha, Cynthia Boyar Trejo, Ivan Niño, Art Fierro, Lily Limón, and Chris Canales.

---

**NOTICE TO THE PUBLIC:**

Motion made by Board Member Canales, seconded by Board Member Limón, and unanimously carried to **APPROVE** all matters listed under the Consent Agenda (Items approved, postponed, or deleted pursuant to the vote on the Consent Agenda will be shown with an asterisk (\*).)

**AYES:** Board Chair Johnson and Board Members Chávez, Acevedo, Maldonado-Rocha, Boyar Trejo, Niño, Fierro, Limón, and Canales

**NAYS:** None

---

**CALL TO THE PUBLIC – PUBLIC COMMENT:**

Mr. Diego Grajales, citizen, commented.

---

**CONSENT AGENDA – APPROVAL OF MINUTES:**

1. \*Motion made, seconded, and unanimously carried to **APPROVE** the minutes of the Regular Mass Transit Department Board Meeting of December 2, 2025.
- 

**CONSENT AGENDA – REQUEST TO EXCUSE ABSENT MASS TRANSIT BOARD MEMBERS:**

2. **NO ACTION** was taken on this item.
-

**CONSENT AGENDA – RESOLUTIONS:**

3.

**\*RESOLUTION**

**WHEREAS**, in compliance with federal law, specifically 49 U.S.C. §5329, the City of El Paso's Mass Transit Department ("Sun Metro") maintains a public transportation agency safety plan, called Sun Metro Agency Safety Plan ("plan"); and

**WHEREAS**, the City of El Paso updates the plan periodically in order to maintain compliance with the law and ensure the safety of the employees, the riders and the community at large; and

**WHEREAS**, the last update to the plan was approved by the City of El Paso's Mass Transit Department Board on February 4, 2025; and

**WHEREAS**, City of El Paso now wishes to update the plan to improve the services provided to the community and ensure the safety of its employees and the public it serves.

**NOW THEREFORE, BE IT RESOLVED BY THE MASS TRANSIT DEPARTMENT BOARD OF THE CITY OF EL PASO:**

That the Sun Metro Agency Safety Plan attached to this resolution as Attachment "A\*" is approved and adopted.

That the City Manager, or designee, be authorized to submit the Sun Metro Agency Safety Plan to the Federal Transit Administration, the Texas Department of Transportation, the State Safety Oversight Agency and any other entities required by law.

That the City Manager, or designee, be authorized to execute any documents and perform any actions necessary to effectuate the Sun Metro Agency Safety Plan.

\*Attachment "A" is available at the City Clerk's Office.

---

**CONSENT AGENDA – NOTICE FOR NOTATION:**

4. For Notation Only:

Notice of Sun Metro's Title VI Program update. The program update was 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."

**NO ACTION** was taken on this item.

---

**REGULAR AGENDA – OPERATIONAL FOCUS UPDATES:**

**5. Operational update on the Mass Transit Department Sun Metro.**

Mr. Anthony DeKeyzer, Director of Sun Metro, presented.  
Board Chair Johnson and Board Members Chávez and Maldonado-Rocha commented.

**NO ACTION** was taken on this item.

---

**ADJOURN**

Motion made by Board Member Canales, seconded by Board Member Limón, and unanimously carried to **ADJOURN** the meeting at 11:58 a.m.

**AYES:** Board Chair Johnson and Board Members Chávez, Acevedo, Maldonado-Rocha, Boyar Trejo, Niño, Fierro, Limón, and Canales

**NAYS:** None

---

**Approved as to content:**



Anthony DeKeyzer, Director of Mass Transit

## Appendix E: Sun Metro Certifications & Assurances

# City of El Paso | SUN METRO | 1539

[Summary](#)
[Applications/Awards](#)
[TrAMS Users](#)
[Locations](#)
[Designated Recipient](#)
[Related Actions](#)

## Certifications & Assurances | FY 2025 C&A Affirmations

### Certification and Assurance Information

<b>Fiscal Year</b> 2025	<b>Original Certification Date</b> 6/10/2025
<b>Assigned Date</b> 5/23/2025	<b>Latest Certification Date</b> 6/10/2025
<b>Due Date</b> 8/21/2025	

### Published Certifications and Assurances

[FTA CERTIFICATIONS AND ASSURANCES](#)

### Public Transportation Agency Safety Plan (PTASP)

Applicants and recipients of Section 5307 grants and rail transit agencies that are subject to the State Safety Oversight Program must certify to Category 2: Public Transportation Agency Safety Plans (PTASP). The deadline for certification was July 20, 2020, however, in light of the extraordinary challenges presented by the COVID-19 public health emergency, FTA issued a Notice of Enforcement Discretion for the PTASP regulation (49 CFR Part 673). FTA will refrain from taking enforcement action until July 21, 2021 for applicants and recipients unable to certify compliance with the PTASP regulation before July 20, 2021. While applicants and recipients are encouraged to certify compliance as soon as reasonably practicable under the current circumstances caused by the COVID-19 public health emergency, those who do not certify compliance until July 20, 2021 remain eligible for Chapter 53 grant funds.

[List of All Applicable Agencies](#)

[PTASP Technical Assistance Center](#)

### Certifications and Assurances

#### Certification History

Certification Date: 6/10/2025 | Official: Anthony Dekeyzer | Attorney: Joyce Garcia

Category	Title	Cer
01	Certifications and Assurances Required of Every Applicant	
02	Public Transportation Agency Safety Plans	
03	Tax Liability and Felony Convictions	
04	Private Sector Protections	
05	Transit Asset Management Plan	
06	Rolling Stock Buy America Reviews and Bus Testing	
07	Urbanized Area Formula Grants Program	
08	Formula Grants for Rural Areas	
09	Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	
10	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	

11	Enhanced Mobility of Seniors and Individuals with Disabilities Programs	←
<b>Category</b>	<b>↑ Title</b>	<b>Cer</b>
12	State of Good Repair Grants	←
13	Infrastructure Finance Programs	←
14	Alcohol and Controlled Substances Testing	←
15	Rail Safety Training and Oversight	←
16	Demand Responsive Service	←
17	Interest and Financing Costs	←
18	Cybersecurity Certification for Rail Rolling Stock and Operations	←
19	Tribal Transit Programs	←
20	Emergency Relief Program	←
<b>1 – 20</b> of 20		

Documents

**Existing Documents**

Document	Description	Uploaded By	Date	↓
No items available				

Affirmation of Applicant

**Affirmation of Applicant** BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 et seq., and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute.

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

**Official's Name** Anthony Dekeyzer

I accept the above

**Certification Date** May 30, 2025

Affirmation of Attorney

**Affirmation of Applicant's Attorney** As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

**Attorney's Name** Joyce Garcia

I accept the above

**Certification Date** Jun 10, 2025

CANCEL