



# **Title VI Program**

**August 23, 2023**

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Revised in Response to Title VI Program Review Assessment

Dated November 30, 2021

**SANTA FE TRAILS**  
**TITLE VI COMPLIANCE PLAN**

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**August 2023**

**PART ONE: Introduction**

The City of Santa Fe operating the Santa Fe, prepared this Title VI Public Notice of Rights and Complaint Process in compliance with the Title VI Circular 4702.1B. There is no history of and or active investigations, lawsuits and/or complaints concerning Civil Rights Compliance.

Transit service operates as a fixed route serving six city routes seven days a week. Four Commuter/College Routes operates weekdays with limited Saturday service. Santa Fe Pick-up Shuttle provides service around Downtown and to Museum Hill and Canyon Road. Connections to the Santa Fe Depot Rail Runner Station are also scheduled. Curb to curb transportation service for persons with disabilities who cannot use the regular service is available. All vehicles in the fleet are wheelchair accessible and all stops provide access for mobility devices. Santa Fe Trails has developed system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin.

No sub-recipients are active in providing transit services. All service is provided and facilities are located within the city limits of Santa Fe.

Santa Fe is governed by the elected Mayor and City Council. The Council currently includes four females and five males, three Caucasian and six Hispanic/Latino. The Transit Advisory Board (TAB) is a citizens committee appointed by the Mayor that informs and makes recommendations to the City Council on the policies, procedures and development of the City’s public transportation system. It is intended that there be diversity in the TAB membership, representing the various demographics (e.g., age, sex, and race) reflected in the population of the transit system’s service area. While active membership varies and there are often vacancies, current membership includes:

| Transit Advisory Board |        |           |                     |       |
|------------------------|--------|-----------|---------------------|-------|
| Male                   | Female | Caucasian | Hispanic/<br>Latino | Other |
| 5                      | 2      | 5         | 2                   | 0     |

To encourage minorities to participate on these Boards, Santa Fe Trails maintains active participation with minority business organizations such as the Santa Fe Hispanic Chamber, several Senior Services such as Senior Scene, and the City’s ADA Coordinator,

An Equity Analysis has been completed for the two capital funding projects and is attached in Appendix A. Both are improvements/renovation of properties already owned by the City of Santa Fe. No land acquisitions or displacement of persons from their residences or business will be required. The two facilities are the Downtown Transfer Center/Sheridan Avenue and the Southside Transit Center.

- Southside Transit Hub: This facility will be key to the future of a reconfigured Santa Fe Trails system. In addition to providing a transfer point between fixed routes, it will provide a necessary connection between potential demand response/microtransit services as well as serve as a hub for bicycles and pedestrian access for nearby land uses.
- Downtown Transit Center: This project will improve passenger amenities and safety to enhance the public's perception of transit services. The existing facility on Sheridan Avenue does not provide a pleasant waiting environment, lacks restrooms, adequate shelter/seating, and the ability to provide transit information.

## **PART TWO: Public Notice of Rights**

The following statement shall be posted on site at the Santa Fe Trails office, on the Santa Fe Trails website ([www.santafenm.gov/transit](http://www.santafenm.gov/transit)); permanently displayed on public transit vehicles; and other appropriate materials made available to the public: *(Documents will be translated into languages other than English, upon request.)*

*Non-Discrimination - Your Rights under Title VI of the Civil Rights Act of 1964*  
*The United States Department of Transportation (DOT) ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color or national origin in the provisions of benefits and services resulting from federally assisted programs and activities. The Santa Fe Trails operates without regard to race, color, and national origin. Any person, who believes the Santa Fe Trails has violated his /her Title VI protections, should contact the Santa Fe Trails at 505-955-2001 or toll free 866-551-7433, Title VI Coordinator. The Santa Fe Trails has also developed a policy to assist individuals who are Limited English Proficient (LEP). Translation services in order to assist LEP individuals shall be made available to Santa Fe Trail customers upon request. The Santa Fe Trails Title VI policy, complaint procedures and LEP Plan shall be made available upon request by contacting the Santa Fe Trails Department at the above-noted information. For Federal Title VI information please contact the Federal Transit Administration (FTA), Region 6 at 817-978-0567. Federal Title VI information, including filing complaints, can also be accessed on the FTA web site at: [www.fta.dot.gov](http://www.fta.dot.gov).*

## **PART THREE: Complaint Process and Investigation Procedures**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by the Santa Fe Trails. All Title VI obligations and complaint procedures will be translated into other languages as needed.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and Santa Fe Trails may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The Santa Fe will prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

Over the past three years, Santa Fe Trails has not received any allegations of discrimination based on race, color, or national origins. No active investigations have been conducted by entities other than the FTA and no lawsuits and/or complaints naming the grantee have been filed concerning Title VI rights.

When a complaint is received, the following measures will be taken to resolve Title VI complaints:

- 1) A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. The Santa Fe Trails strongly encourages the use of the attached *Santa Fe Trails Title VI Complaint Form* when filing official complaints.

The preferred method is to file your complaint in writing using the *Santa Fe Trails Title VI Complaint Form*, and sending it to:

Title VI Coordinator/Grant Administrator  
Santa Fe Trails  
2931 Rufina Street  
Santa Fe, NM 87507

or NMDOT  
Program Manager  
Civil Rights and Business Resource Center  
1570 Pacheco Street, Building A-10  
Santa Fe, NM 87505  
505-470-6739

|    |   |    |   |
|----|---|----|---|
| or | Federal Transit Administration<br>Region 6<br>Attn: Civil Rights Officer<br>819 Taylor Street<br>Room 14A02<br>Fort Worth, TX 76102<br>817-978+0567 | or | Federal Transit Administration<br>Civil Rights Office<br>Attn: Complaint Team<br>East Building, 5 <sup>th</sup> Floor - TCR<br>1200 New Jersey Ave., SE<br>Washington, DC 20590 |
|----|---|----|---|

- 2) In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Santa Fe Trails Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Santa Fe Trails Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
- 3) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) calendar days by registered mail.

- 4) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 calendar days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- 5) Within 15 calendar days from receipt of a complete complaint, the Santa Fe Trails will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) calendar days of this decision, the complainant or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
  - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - b. If the complaint is to be investigated, the notification shall state the grounds of the Santa Fe Trails' jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6) When the Santa Fe Trails does not have sufficient jurisdiction, the Transit Division Director or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- 7) If the complaint has investigative merit, the Transit Division Director or his/her authorized designee will instruct the Title VI Coordinator to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the Transit Division Director within 60 calendar days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Title VI Coordinator will notify the appropriate authorities, and an extension will be requested.
- 8) The Transit Division Director or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 calendar days from receipt of the complaint.
- 9) If the Complainant is dissatisfied with the Santa Fe Trails resolution of the complaint, he/she has the right to file a complaint with the NMDOT Title VI Coordinator or FTA Region 6 Civil Rights Officer or FTA Office of Civil Rights – Complaint Team. (Contact information in Section 1)

FTA Complaint procedures can also be found on the FTA web site at: [www.fta.dot.gov](http://www.fta.dot.gov). These procedures are also outlined in FTA Circular 4702.1B, Chapter IX.

Title VI Complaint Form

Instructions: If you would like to submit a Title VI complaint to the Santa Fe Trails, please fill out the form below and send it to: Santa Fe Trails, Attn: Title VI Coordinator, 2931 Rufina Street, Santa Fe, NM 87507. For questions or a full copy of the Santa Fe Trails Title VI policy and complaint procedures call 505-955-2001 or email tamartinez@santafenm.gov.

|   |             |  |                   |    |
|---|-------------|--|-------------------|----|
| <b>Section I:</b>   |             |  |                   |    |
| Name:   |             |  |                   |    |
| Address:  |             |  |                   |    |
| Telephone (Home):   |             |  | Telephone (Work): |    |
| Electronic Mail Address:  |             |  |                   |    |
| Accessible Format Requirements?   | Large Print |  | Audio Tape        |    |
|   | TDD         |  | Other             |    |
| <b>Section II:</b>  |             |  |                   |    |
| Are you filing this complaint on your own behalf?   |             |  | Yes*              | No |
| *If you answered "yes" to this question, go to Section III.   |             |  |                   |    |
| If not, please supply the name and relationship of the person for whom you are complaining:   |             |  |                   |    |
| Please explain why you have filed for a third party: _____  |             |  |                   |    |
| Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.   |             |  | Yes               | No |
| <b>Section III:</b>   |             |  |                   |    |
| I believe the discrimination I experienced was based on (check all that apply):   |             |  |                   |    |
| <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin   |             |  |                   |    |
| Date of Alleged Discrimination (Month, Day, Year): _____  |             |  |                   |    |
| Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. |             |  |                   |    |
| _____   |             |  |                   |    |
| _____   |             |  |                   |    |
| <b>Section IV</b>   |             |  |                   |    |
| Have you previously filed a Title VI complaint with this agency?  |             |  | Yes               | No |
| <b>Section V</b>  |             |  |                   |    |
| Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?   |             |  |                   |    |
| <input type="checkbox"/> Yes <input type="checkbox"/> No  |             |  |                   |    |

|  |   |
|--|---|
| If yes, check all that apply:  |   |
| <input type="checkbox"/> Federal Agency: _____   |   |
| <input type="checkbox"/> Federal Court _____   | <input type="checkbox"/> State Agency _____ |
| <input type="checkbox"/> State Court _____   | <input type="checkbox"/> Local Agency _____ |
| Please provide information about a contact person at the agency/court where the complaint was filed. |   |
| Name:  |   |
| Title:   |   |
| Agency:  |   |
| Address:   |   |
| Telephone:   |   |
| <b>Section VI</b>  |   |
| Name of agency complaint is against:   |   |
| Contact person:  |   |
| Title:   |   |
| Telephone number:  |   |

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

\_\_\_\_\_  
Signature Date

Please submit this form in person at the address below, or mail this form to:  
 Santa Fe Trails Title VI Coordinator  
 2931 Rufina Street  
 Santa Fe, NM 87507  
 For assistance contact 505-955-2223



## **PART FOUR Public Participation**

### **Public Participation Plan (PPP)**

The Santa Fe Trails Public Participation Plan (PPP) describes how the Santa Fe Trails communicates and distributes information to the public as well as how the public can interact and provide comments to the Santa Fe Trails. The needs of those traditionally underserved by the existing system will be sought and considered by the transit system.

Through its public involvement efforts, the Santa Fe Trails will strive to achieve the following Title VI and Environmental Justice (EJ) goals:

- 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.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Title VI states that no person shall, on the ground of race, color, or national origin, be excluded from participation in, denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. The Santa Fe Trails will ensure that the input and feedback from all people will be considered in the development of Santa Fe Trails planning documents and activities.

EJ concerns and goals should be considered throughout all public engagement efforts, from project planning through construction and operation. This includes public outreach conducted during transportation planning and during the environmental reviews required by the National Environmental Policy Act (NEPA).

To encourage minorities to participate in developing Santa Fe Trail policies, the following actions relating to Environmental Justice and Title VI will be taken to reduce the barriers for participation in the decision-making process by low income, minority or disabled individuals. Over the past three years, Santa Fe Trails has actively undertaken the following activities:

1. When possible, public meetings will be held in locations that are convenient to low and moderate income neighborhoods and accessible to disabled populations. Such locations include community centers, senior centers and schools. Where possible, the staff of Santa Fe Trails will meet at the locations of businesses, neighborhood groups, stakeholders, and other agencies.
2. Upon request, all Santa Fe Trails work products and documents will be made available in alternative formats, including Braille, large type and languages other than English.
3. The following statement will be included in all Santa Fe Trails documents: The Santa Fe Trails does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in the provision of services. This document can be made available in alternative formats by calling the Santa Fe Trails Office at 505-955-2011.

4. The following statement will be included in all meeting announcements:  
 If you are an individual with a disability who is in need of a reader, amplifier, qualified sign language interpreter, or any other form of auxiliary aid or service to attend or participate in the hearing or meeting, please call 505-955-2001 or Toll Free 866-551-7433 or send an email to [snbolleter-gonzales@santafenm.gov](mailto:snbolleter-gonzales@santafenm.gov) five working days prior to the meeting. Public documents, including the agenda and minutes, can be provided in various accessible formats. Please contact the Public Works Administrative Assistant if a summary or other type of accessible format is needed.
5. Agencies and organizations that represent low income, minority and disabled populations will be identified and included in Santa Fe Trails mailings. Staff will maintain an active listing of contacts for these organizations. These organizations include SCORE (Mentoring Small Business Entrepreneurs), Santa Fe Small Business Center, and Santa Fe Hispanic Chamber.
6. The Santa Fe Trails will evaluate Environmental Justice actions and Title VI requirements on an annual basis to ensure effectiveness of public involvement. This document will be reviewed and updated in conjunction with the Public Participation Plan.
7. The Transit Advisory Board is made of citizens reflecting the diversity of our community including a range of races, ages, and sex. The TAB includes frequent Santa Fe Trail riders and actively supports and advocated for the needs of minority and LEP groups.
8. In addition to information/community meeting opportunities, a primary opportunity for public participation over the past three years has information in The Santa Fe Office of Economic Development Newsletter. In addition to Meeting information, Workforce Resources and Small business Financing, all RFPs are publishes in this bilingual format. The most recent newsletter offers information about a Black Foundation Start-Up Grant and a Backstage Capital Grant targeting the LGBTQ. Santa Fe Trails maintains information about these options and is a frequent source of transit to meetings. newsletters published by

In 2021, a comprehensive planning effort focused on reviewing current services and respond to community interest in alternatives. This resulted in the Santa Fe Multimodal Transition Plan. This was supported by both the City and the Santa Fe MPO. Extensive outreach to capture public participation was included. Focus Groups and Number of Participants surveyed include:

| Focus Group                     | Number of Individuals |
|---------------------------------|-----------------------|
| General Public and Unhoused     | 884                   |
| Students                        | 690                   |
| Visitors                        | 3,905                 |
| Onboard Passengers              | 193                   |
| Santa Fe Trails Operating Staff | 7                     |

## Communication and Notification to the Public

All members of the public are ensured protections against discrimination which are afforded to them by Title VI. To ensure open communication with the public, the Santa Fe Trails will adhere to the following requirements:

- The Santa Fe Trails will disseminate agenda and public meeting information to members of the public via accessible printed and electronic media, including postings on the transit's website. Documents and agendas will be available at the Santa Fe Trails Office 2931 Rufina Street.
- Public notices of Santa Fe Trails meetings will be posted at the location of the meeting site.
- In appropriate documents, the Santa Fe Trails will include a statement that the organization complies with Title VI by assuring that no person shall on the grounds of race, color, national origin, gender, age, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity under any Santa Fe Trails transit program, activity, or service.

## **PART FIVE System-Wide Service Standards/Policies**

### **System-Wide Service Standards/Policies**

Service Standards and Policies have been developed to assure that frequency of service, age and quality of vehicles assigned to routes, quality of stations and location of routes are not determined on the basis of race, color, or national origin. No person will be excluded from participation or denied benefits of the service based on race, color or national origin.

#### Service Standards:

##### Vehicle Load:

Vehicle loads will be determined by the seating capacity of specific vehicles: All vehicles are equipped with standee bars/rails.

| Average Vehicle Load Standards: Passenger Capacities |        |          |       |                     |
|--|--------|----------|-------|---------------------|
| Vehicle Type   | Seated | Standing | Total | Maximum Load Factor |
| 35ft Bus   | 30     | 15       | 45    | 1.3                 |
| 30ft Bus   | 25     | 15       | 40    | 1.3                 |
| Vans   | 23     | 8        | 31    | 1.3                 |
|  |        |          |       |                     |

##### Headway:

Headway (the amount of time between two vehicles traveling in the same direction, vary depending on the service provided and the day of week. Headway standards for current services include:

| Headways (May vary based on Peak Times/Early Morning/Late Night) |         |            |            |
|--|---------|------------|------------|
| Santa Fe Trails  | Weekday | Saturday   | Sunday     |
| Route 1  | 25      | 60         | 60         |
| Route 2  | 15      | 30         | 30         |
| Route 4  | 30      | 60         | 60         |
| Route 5  | 60      | 60         | No Service |
| Route 6  | 60      | 60         | No Service |
| Route M  | 60      | 60         | 60         |
| Route 21   | 70      | No Service | No Service |
| Route 22   | 60      | No Service | No Service |
| Route 24   | 35      | 70         | 70         |
| Route 26   | 70      | 70         | 70         |
| Historic Shuttle   | 15      | 15         | 15         |
| Museum Shuttle   | 30      | 30         | 30         |
| Canyon Road Shuttle  | 30      | 30         | 30         |

On Time Performance:

On-time performance is based on monitoring the daily operations of Santa Fe Trails’ route, Commuter, and Shuttle services based on published standards. Our target is 95% of all transit vehicles will complete the established runs no more than 5 minutes early or late.

A vehicle is considered on time if it departs a scheduled time point within 3 minutes of the published time. Our target for on-time performance is 90% or greater.

Performance is monitored by Dispatch as well as GPS tracking installed on each vehicle. We also encourage all riders to comment on all aspects of service including on-time performance.

Service Availability Standards:

The Santa Fe Trails has designed three levels of service to insure availability to a maximum number of riders.

Routes: Operates in five neighborhoods providing access to residents within a ¼ mile walk to the nearest bus stop. Service is more frequent during peak hours on the weekday, with less frequent service on Saturday and Sunday

Commuter Routes: Operates to service college/business parks with maximum service during peak hours. Two routes do not have weekend service with limited service on Saturday and Sunday to two educational centers.

Shuttle: Operated in the heavily traveled shopping, art, and museum districts frequented by many tourists and visitors. In addition to providing easy on/Off service, the shuttle provides significant relief from traffic/parking congestion.

### Service Policies

#### Distribution of Transit Amenities:

Bus stop signs are located along the route.

Printed information is available on each vehicle. Also posted on each vehicle are route maps and visitor information. Video technology, available on all vehicles, is used to provide current information.

Waste receptacles are placed throughout the City.

#### Vehicle Assignment

The average age of the vehicles is 7 (seven) years. Vehicles are assigned based on capacity required (i.e. for route service, larger vehicles on weekdays, and smaller vehicles on weekends). Vehicles are rotated between routes to assure equitable access to newer vehicles. All vehicles have similar technology such as video capacity and GPS locators.

## **PART SIX: Limited English Proficiency Plan**

### **I. INTRODUCTION**

This Limited English Proficiency (LEP) Plan, for the Santa Fe Trails/dba Santa Fe Trails has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides that no person shall “on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to “... improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of funds from the Federal Transit Administration (FTA), through the New Mexico Department of Transportation (NMDOT), this Limited English Proficiency (LEP) Plan for the Santa Fe Trails has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to our transit programs by persons with limited English proficiency.

### **II. POLICY**

It is the policy of the Santa Fe Trails to ensure that our programs and activities, normally provided in English, are accessible to Limited English Proficiency (LEP) persons and thus do not discriminate on the basis of national origin in violation of the Title VI prohibition against national origin discrimination. The Santa Fe Trails will, to the maximum extent feasible, in its official deliberations and communications, community outreach and related notifications, provide appropriate alternative non-English formats for persons with LEP to access information and services provided.

The Santa Fe Trails will comply with the “safe harbor” concept as it applies to the translation written of documents when certain thresholds are exceeded. Oral interpretation may be acceptable access when the translation of documents becomes burdensome as to defeat the legitimate objectives of a program. Safe Harbor guidelines include:

| Size of Language Group  | Recommended provision of written language assistance                                | Santa Fe Trails Population Groups Meeting Safe Harbor Guidelines |
|---|---|--|
| 1,000 or more in eligible population in the market area or among current beneficiaries. | Translated vital documents.   | Spanish, Asian and Pacific Island                                |
| More than 5% of the eligible population or beneficiaries and more than 50 in number.    | Translated vital documents.   | Spanish, Asian and Pacific Island                                |
| More than 5% of the eligible population or beneficiaries and 50 or less in number       | Translated written notice of right to receive free oral interpretation of documents | Spanish, Asian and Pacific Island, Other Indo European.          |
| 5% or less of the eligible population or beneficiaries and less than 1,000 in number    | No written Translation is required.   | Spanish, Asian and Pacific Island, Other Indo European           |

The website for Santa Fe Trails is programed to translate documents by selection of the preferred language. Current documents available in Spanish include ADA, Title VI, All Routes/Schedules/Maps, Comments/Complaints/Suggestions, and Job Opportunities.

### III. LIMITED ENGLISH PROFICIENCY NEEDS OF AREA

The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have with LEP persons in providing transit services. Each of these elements is addressed below.

#### Factor 1. Number and Percentage of LEP Persons in Our Area

##### 1. Permanent Population

As shown in the table below, it is estimated that 10.5% (14,565) of our residents over the age of 5 speak English less than very well. Of that portion of the population that speaks English less than very well, 31.3% speak Spanish, 29.7% speak Asian and Pacific Island languages, 13.5% speak other Indo European languages, and 8% speak other languages.

| Number or Proportion of LEP Individuals                         |         |                          |                                    |
|---|---------|--------------------------|------------------------------------|
| Subject   | Total   | Speaks English Very Well | Speaks English Less than Very Well |
| Population 5 Years or Over                                      | 138,713 | 89.5%                    | 10.5%                              |
| Total Speaks a Language other than English                      | 35.4%   | 70.4%                    | 29.6%                              |
| Spanish   | 31.6%   | 68.7%                    | 31.3%                              |
| Other Indo European   | 1.8%    | 86.5%                    | 13.5%                              |
| Asian and Pacific Island  | 0.8%    | 70.3%                    | 29.7%                              |
| All Other   | 1.2%    | 92.0%                    | 8.0%                               |
| US Census 2010-2014, American Community Survey, 5 Year Estimate |         |                          |                                    |
| Extract from US ACS Table                                       |         |                          |                                    |

**Factor 2 & 3 Nature, Frequency and Importance of LEP Contact**

1. Nature of Contact

The Santa Fe Trails provides deviated fixed route service throughout the community. Mobility limited persons are accommodated in compliance with the Americans with Disabilities Act. Contacts with all riders as well as LEP persons include:

- All contact information is available in Spanish
- All printed brochures/schedules are available in Spanish when requested.
- Phone numbers to contact for additional information are prominently displayed on both the printed schedule and each bus.

The Transportation Manager will provide Dispatch/Driver Supervisors with specific direction to monitor and record in daily dispatch record the frequency of contacts with LEP persons. Information will be reviewed quarterly. The Transit Division Director will monitor and ensure that Title VI provisions and LEP persons are not denied or delayed in the provision of any service or benefit from the transportation planning process or the implementation of federally funded projects.

2. Frequency of Contact

While Santa Fe Trails does not have any record which indicates the frequency that LEP persons contact to request alternate language service, based on driver feedback, there are minimal requests for additional alternate language information.

3. Importance of Contact

In rating the importance of current contacts or potential contacts with LEP individuals, the Santa Fe Trails is taking the position that all riders are important and while there are minimal requests for alternate languages, this service will be provided.

**Factor 4. Resources Available for LEP Outreach**

The Santa Fe Trails will allocate the necessary resources for LEP outreach. At this time it includes funding for translation service and website enhancement. There is a significant number of bilingual staff speaking both English and Spanish when oral translation is needed.

**IV. LANGUAGE ASSISTANCE PLAN**



A. How Will You Identify LEP Persons Who Need Language Assistance?

- Driver Team will be front line for identifying needs
- Dispatch/Driver Supervisors will monitor and record requests for LEP
- Language alternatives will be coordinated with Santa Fe MPO; New Mexico Road Runner Express will be advised of access to alternate languages if needed.
- City Council will be advised of plan.

B. How Will You Identify Language Assistance Measures?

- Actively review additional options for providing service.
- Monitor number of requests for alternate language materials based on requests recorded by Dispatch/Driver Supervisors...

C. How Will Your Staff Be Trained?

- Driver Team training will include Customer Service Standards with a module on assisting Limited English Proficiency riders
- All Dispatch/Information staff will have availability to a bilingual staff person.

D. What Will Be Your Outreach Efforts?

- All requests for information will be provided in alternate languages.
- Drivers will be asked to provide input into additional opportunities to reach non-English speakers.
- We will continue to maintain and support contact with organizations supporting minority communities including SCORE Mentors, Santa Fe Small Business Center, and the Santa Fe Hispanic Chamber.

E. What Is Your Monitoring and Updating Plan?

- Request routine feedback from Driver Team contractor concerning any increased demand/incidents of needing information.
- Update brochure in alternate languages as needed.

F. How Will You Disseminate Your LEP Plan?

- Copies will be provided to Driver Team Supervisors.
- Copies will be provided and reviewed by the TAB.
- All Administrative Staff will be provided with a copy.

## APPENDIX A

### Sante Fe Trails Title VI Equity Analysis

Santa Fe Trails is planning to complete two capital projects to support and improve the services provided in the City of Santa Fe. This Equity Analysis has been prepared to comply with Title 49 CFR part 21, Appendix C, Section 3(iv) requiring the “location of projects requiring acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” To complete this Analysis, issues to be address include:

- Assurance that selection was made without regard to race, color, or national origin.
- Analysis of equity impacts on various location alternatives.
- Engagement in outreach to persons potentially impacted by siting.
- Determination of any cumulative impacts of location.

The two projects will be discussed separately. The projects are:

- **Southside Transit Hub:** This facility will be key to the future of a reconfigured Santa Fe Trails system. In addition to providing a transfer point between fixed routes, it will provide a necessary connection between potential demand response/microtransit services as well as serve as a hub for bicycles and pedestrian access for nearby land uses.
- **Downtown Transit Center:** This project will improve passenger amenities and safety to enhance the public’s perception of transit services. The existing facility on Sheridan Avenue does not provide a pleasant waiting environment, lacks restrooms, adequate shelter/seating, and the ability to provide transit information.

#### Southside Transit Hub

To review that the land selection was made without regard to race, color or national origin, The Santa Fe Multimodal Transition Plan examined populations that are vulnerable to transportation on the basis of race/ethnicity and/or low-income status. The method used was the Transit-Dependent Index and Environmental Justice Index. Using the average, an incremental score also known as the amount of vulnerability , is assigned from 1 (very low) to 5 (very high). Application of these methods determined that in the Southside Transit Hub, located in the western part of the city, Census Blocks 12.05, .06, and .07 ranked Very High. This area is bounded by Aqua Fria Street on the north and Airport Road on the south, just west of the intersection of Cerrillos Road and Airport Road.

To analyze the equity impact of various location alternatives, the parcel (which is owned by the City of Santa Fe in fee simple) was considered optimal as existing building improvements on the parcel can be converted to serve transit. The location is near a former bus station at the Santa Fe Place Mall that was also under consideration. The Mall was considered but because of issues during negotiations and increased cost was not selected. The current location, in the Valdez Industrial Park area, is equally appropriate to serve a diverse community. One of the fastest growing, majority Hispanic and dense (higher number of individuals per households) areas in the City, It includes multiple mobile home parks and a growing commercial corridor.

Outreach to persons potentially impacted by the location of the Southside Transit Hub was a significant focus of The Santa Fe Multimodal Transition Plan. During this process over 5,000 contacts were made through focused surveys from various interest groups including General Public/Unhoused, Student, Visitors, Onboard Transit Passengers, and Bus Operators. Comments received that are relevant to the Southside Transit Hub location include:

- The location will address concerns with poor pedestrian infrastructure in the Airport Park area.
- Will facilitate shorter travel times with timed transfer improvement to this local commercial area.
- For students, this location near a more affordable housing area will provide access to local schools.
- Need for Improved access to the Airport was a significant finding from the Onboard Transit Passenger Survey.
- Santa Fe Trails staff identified two specific areas for improvement – long route lengths and difficult transfers. This Southside Transit Hub site addresses both these issues.

Cumulative impacts of the Southside Transit Hub have been considered. This location will provide service to the Santa Fe Place Mall, and adjacent “big box” stores as well as a mix of old and new residential areas. This area has a diverse mix of zoning classification including residential (up to 20 dwellings units per acre) commercial shopping center, and industrial and is an opportunity to achieve more trip purposes within walking or bicycling distance. The Airport Road Overlay Area (along Airport Road west of Cerrillos Road) was established in part to encourage walkable neighborhood and reduce the dependence on the private automobile. The Southside Transit Hub will serve as the nucleus for improved multimodal transit success.

#### Downtown Transit Center

To review that the land selection was made without regard to race, color or national origin, The Santa Fe Multimodal Transition Plan examined populations that are vulnerable to transportation on the basis of race/ethnicity and/or low-income status. The method used was the Transit-Dependent Index and Environmental Justice Index. Using the average, an incremental score also known as the amount of vulnerability, is assigned from 1 (very low) to 5 (very high). Application of these methods determined that in the Downtown Transit Center, located in the eastern part of the city, Census Blocks 10.02,.01 and Block 6 ranked Very High. This area is bounded by Cerrillos Road on the west, St. Michaels Drive on the south and St. Francis Drive on the east. This location is currently the major downtown bus stop location.

To analyze the equity impact of various location alternatives the Downtown/Railyard area was surveyed. The City owns the road right of way at the site, the roadway is near the Plaza area and has sufficient area for large vehicles. The Plaza area, in addition to the multiple art venues and restaurants, is also the location of the famous Indian Market where visiting tribes offer native art outdoors. This location benefits workers in the downtown area. By encouraging transit use, the number of vehicles is reduced which helps with parking shortages. This site has been utilized for a number of years as a bus pickup/drop off area. Because development in this area is very dense no other suitable parcels were available or affordable.

Outreach to persons potentially impacted by the location of the Downtown Transfer Center was also included in The Santa Fe Multimodal Transition Plan. Using the same focus groups comments received that are relevant to the Downtown Transit Center location include:

- Traffic safety concerns were expressed in terms of the congested Plaza area. Improved transit access at the Downtown Transit Center will encourage bike access and multimodal options.
- As with the Southside Transit Hub, this improved transfer location will support timed transfers and shorter route times.
- While most visitors depend on private autos, access to dependable nearby transit access would be helpful.
- Access to improved information was a significant finding of the Onboard Survey. Improved transit information is included in this project.

Cumulative impacts of the Downtown Transit Center located in the Downtown/Railyard Area have been considered. This area enjoys a significant tourist economy combined with local employment centers. It includes historic districts, the residential neighborhood to the southeast with a grid roadway system, while the Residential neighborhood to the west has a more traditional street network. Much of the area is zoned BCD (Business Capital District) allowing a wide range of potential uses. There are also substantial multifamily residential areas west and south. Much of the Railyard area is zoned commercially (C2 and SC2). This project will significantly upgrade the access and customer service of this existing facility and will enhance the transit multimodal transit goal of the community.

In conclusion, it had been determined that the decision to upgrade two existing facilities to support the goals of the recently adopted Santa Fe Multimodal Transition Plan will not result in a disparate impact on the basis of race, color, or national origin. In this Equity Analysis, substantial justification for locating these projects, the Southside Transit Hub and Downtown Transit Center, have included selection and equity impacts, community outreach and cumulative impacts have been addressed. Both projects will improve and expand existing services.

Reference Documents/Resources:

*Santa Fe Multimodal Transition Plan*, Prepared for the City of Santa Fe and the Santa Fe Metropolitan Planning Organization Prepared by LSC Transportation Consultants, Walker Consultants, Alta Planning & Design, Groundwork Studio, Adopted November 9, 2022, by Santa Fe City Council in Resolution No 2022-65 .

*Santa Fe Title VI Plan* Approved on November 18, 2021, by the Santa Fe MPO Transportation Policy Board.

Santa Fe Land Use Department, Edward Vigil, Property Manager

August 23, 2023