

203
City of Las Cruces[®]
 PEOPLE HELPING PEOPLE

Council Action and Executive Summary

Item # 8 Ordinance/Resolution# 14-042

For Meeting of _____
 (Ordinance First Reading Date)

For Meeting of September 3, 2013
 (Adoption Date)

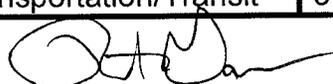
Please check box that applies to this item:

QUASI JUDICIAL LEGISLATIVE ADMINISTRATIVE

TITLE: A RESOLUTION APPROVING ROADRUNNER TRANSIT'S TITLE VI PROGRAM.

PURPOSE(S) OF ACTION:

To approve the Title VI Program.

COUNCIL DISTRICT: ALL		
<u>Drafter/Staff Contact:</u> Michael Bartholomew	<u>Department/Section:</u> Transportation/Transit	<u>Phone:</u> 541.2537
<u>City Manager Signature:</u>		

BACKGROUND / KEY ISSUES / CONTRIBUTING FACTORS:

The City of Las Cruces (City), RoadRUNNER Transit (Transit) is required to submit an updated Title VI Program every three years to the Federal Transit Administration (FTA). This update outlines the City's methodology and practices for ensuring Title VI compliance with the Civil Rights Act of 1964. As a recipient of federal funding through the FTA that is used to provide public transit service, the City is required to provide access to its transit services and to its transit planning process without discrimination on the basis of race, color, or national origin.

In October 2012, the FTA updated its compliance requirements for the triennial submission. One of these new requirements is that a transit agency's Title VI Program must be approved by the governing body prior to submitting the program update to the FTA. There are nine components that are included in the update: (1) the Title VI Notice to Public Statement, (2) the process for registering a Title VI complaint, (3) the complaint form, (4) a summary of Title VI complaints, investigations, and lawsuits during the previous three years, (5) the Transit Section's Public Comment and Public Participation Policy, (6) a Limited English Proficiency (LEP) Four-Factor Analysis, (7) the composition of the Transit Advisory Board on the basis of race, color, and national origin, (8) transit service standards, and (9) transit service policies.

Together, these documents demonstrate how the City is addressing the Title VI requirements. They demonstrate the tools that are used to ensure that individuals are not discriminated against in terms of delivery of service and access to the transit planning process on the basis of race, color, or national origin. Meeting this requirement includes: creating documents in languages

(Continue on additional sheets as required)

other than English (for example, a bus schedule), encouraging minority participation on advisory boards, and ensuring that the transit service and access to the planning process is provided equitably to everyone in the community regardless of minority status or level of English proficiency. Examples of types of service that the Title VI process is meant to prevent; includes service that tends to provide minority neighborhoods with older buses, more crowded routes, less frequent service, or fewer bus shelters and bus stops.

Once the Title VI Program is approved by City Council, it will be submitted to the FTA. The City must provide its submission by October 1, 2013, with the update to be approved by the FTA by November 30, 2013. If the Title VI Program has not been approved by the FTA by November 30th, the City will be unable to get FTA grants approved until that update has been accepted.

SUPPORT INFORMATION:

1. Resolution.
2. Exhibit "A", RoadRUNNER Transit's Title VI Program.

SOURCE OF FUNDING:

Is this action already budgeted? N/A	Yes	<input type="checkbox"/>	See fund summary below
	No	<input type="checkbox"/>	If No, then check one below:
	<i>Budget Adjustment Attached</i>	<input type="checkbox"/>	Expense reallocated from: _____
	<input type="checkbox"/>	<input type="checkbox"/>	Proposed funding is from a new revenue source (i.e. grant; see details below)
	<input type="checkbox"/>	<input type="checkbox"/>	Proposed funding is from fund balance in the _____ Fund.
Does this action create any revenue?	Yes	<input type="checkbox"/>	Funds will be deposited into this fund: _____ in the amount of \$ _____ for FY ____.
	No	<input checked="" type="checkbox"/>	There is no new revenue generated by this action.

BUDGET NARRATIVE

N/A

FUND EXPENDITURE SUMMARY:

Fund Name(s)	Account Number(s)	Expenditure Proposed	Available Budgeted Funds in Current FY	Remaining Funds	Purpose for Remaining Funds
N/A	N/A	N/A	N/A	N/A	N/A

(Continue on additional sheets as required)

OPTIONS / ALTERNATIVES:

1. Vote "Yes"; this will enable RoadRUNNER Transit to submit a City of Las Cruces Council approved Title VI Program to the FTA, satisfy this FTA requirement for continued funding, and RoadRUNNER Transit's compliance.
2. Vote "No"; this will not approve the resolution and cause RoadRUNNER Transit to be out of compliance for a necessary funding requirement.
3. Vote to "Amend"; this could delay RoadRUNNER Transit's compliance with the FTA's requirement for a Title VI Program.
4. Vote to "Table"; this could delay RoadRUNNER Transit's compliance with the FTA's requirement for a Title VI Program.

REFERENCE INFORMATION:

N/A

(Continue on additional sheets as required)

RESOLUTION NO. 14-042

A RESOLUTION APPROVING ROADRUNNER TRANSIT'S TITLE VI PROGRAM.

The City Council is informed that:

WHEREAS, the RoadRUNNER Transit Section is a Federal Transit Administration (FTA) recipient; and

WHEREAS, the RoadRUNNER Transit Section is required to submit a Title VI Program in accordance with FTA Circular 4702.1B attached hereto as Exhibit "A"; and

WHEREAS, the Transit Section is seeking Council approval of RoadRUNNER Transit's Title VI Program.

NOW, THEREFORE, Be it resolved by the governing body of the City of Las Cruces:

(I)

THAT the Transit Section's Title VI Program attached hereto as Exhibit "A", is approved.

(II)

THAT City staff is hereby authorized to do all deeds necessary in the accomplishments of the herein above.

DONE AND APPROVED this _____ day of _____, 2013.

APPROVED:

Mayor

ATTEST:

City Clerk

(SEAL)

VOTE:

Mayor Miyagishima: _____
Councillor Silva: _____
Councillor Smith: _____
Councillor Pedroza: _____
Councillor Small: _____
Councillor Sorg: _____
Councillor Thomas: _____

Moved by: _____

Seconded by: _____

APPROVED AS TO FORM:


City Attorney

City of Las Cruces
RoadRUNNER Transit

Title VI Program Submission to the Federal Transit Administration

September 3, 2013

In accordance with Federal Transit Authority (FTA) Circular 4702.1B, Chapter III and Chapter IV-4, the City of Las Cruces (City) RoadRUNNER Transit submits its Title VI Program. RoadRUNNER Transit operates a fixed route service that has less than 50 fixed route vehicles in peak service and is located in a UZA of less than 200,000 in population.

This document is divided into nine parts plus two appendices. Each part addresses a required submission for the Title VI program.

	Page
Part A – Title VI Notice to Public	2
Part B – Title VI Complaint Procedures	3
Part C – Title VI Complaint Form	5
Part D – Title VI Investigations, Complaints, & Lawsuits (Last 3 years)	7
Part E – Title VI Public Comment and Public Participation Policy and Procedures	8
Part F – Title VI Limited English Proficiency (LEP) Four-Factor Analysis	13
Part G – Representation on Transit Advisory Board	21
Part H – Title VI Service Standards	22
Part I – Title VI Service Policies	23
 <u>APPENDICES</u>	
Appendix A – Compilation of 2010 US Census and ACS data	24
Appendix B – 2000 US Census Data by Census Tract	25
Appendix C – Title VI Public Notice in English and Spanish	29

**Part A
Title VI
Notice to the Public**

The City of Las Cruces Road*RUNNER* Transit is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Toward this end, it is the City of Las Cruces Road*RUNNER* Transit's objective to:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- B. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- C. Promote the full and fair participation of all affected populations in transportation decision making;
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- E. Ensure meaningful access to programs and activities by persons with limited English proficiency.

The Road*RUNNER* Transit system is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities and to the delivery of equitable and accessible transportation services. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Las Cruces.

For more information on the City of Las Cruces' civil rights program and the procedures to file a complaint, contact the EEO/ADA Coordinator at (575) 528-3227 or visit our website: <http://roadrunner.las-cruces.org>

A complaint may be filed directly with the Federal Transit Administration by filing the complaint with:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Road*RUNNER* Transit will publish notification of rights under Title VI in both English and Spanish in the following locations (Appendix C):

- On all printed bus schedules;
- Inside all Road*RUNNER* Transit buses;
- Central Intermodal Facility (when completed); and
- On the Road*RUNNER* Transit website.

Part B
Title VI
Complaint Procedures

The City of Las Cruces RoadRUNNER Transit is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities and to the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with the City of Las Cruces RoadRUNNER Transit or the Federal Transit Administration (FTA). All complaints received by the City of Las Cruces will be referred to the City of Las Cruces EEO/ADA Coordinator for review and action.

In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:

1. The date of alleged act of discrimination; or
2. Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

In either case, the City of Las Cruces may extend the time for filing or waive the time limit in the interest of justice, as long as the City specifies in writing the reason for so doing.

Complaints must be in writing and signed by the complainant and/or the complainant's representative before action can be taken. Complaint shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the City of Las Cruces, the person shall be referred to and interviewed by the EEO/ADA Coordinator. If necessary, the EEO/ADA Coordinator will assist the person in converting the verbal complaint to writing and submit the written version of the complaint to the person for signature. The City of Las Cruces' representative will assist those with limited English proficiency (LEP) in filing a complaint. The complaint shall then be handled according to the City of Las Cruces' investigative procedures.

Within five (5) business days, the EEO/ADA Coordinator will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation and advise the complainant of other avenues of redress available, such as submitting the complaint to the FTA.

The EEO/ADA Coordinator will advise FTA within ten (10) business days of receipt of the allegations. Generally, the following information will be included in every notification to the FTA:

1. Name, address and phone number of the complainant;
2. Name(s) and address(es) of alleged discriminating official(s);

3. Basis of complaint (i.e. race, color or national origin);
4. Date of alleged discriminatory act(s);
5. Date complaint received by recipient;
6. A statement of the complaint;
7. Other agencies (state, local or Federal) where the complaint has been filed; and
8. An explanation of actions the City of Las Cruces has taken, or proposed, to resolve the issue stated in the complaint.

Within forty-five (45) days, the EEO/ADA Coordinator will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a written report of findings to be reviewed by the City of Las Cruces Attorney. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.

Within fourteen (14) business days of receipt of the report from the City of Las Cruces EEO/ADA Coordinator, the City of Las Cruces Attorney will review the report and issue a written determination as to whether discriminatory practice has occurred.

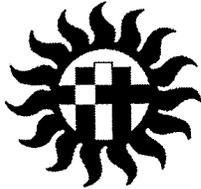
Within five (5) business days of the City of Las Cruces Attorney's written determination, the City of Las Cruces City Manager will forward the determination of the respondent's Department Director for appropriate action, if necessary. The City of Las Cruces City Manager shall forward a copy of the determination, along with the report to the City of Las Cruces EEO/ADA Coordinator who will also provide FTA with a copy of this decision and summary of finding upon completion of the investigation. The City of Las Cruces City Manager will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with FTA if they are dissatisfied with the final decision rendered by the City of Las Cruces.

Title VI contacts are:

EEO/ADA Coordinator
City of Las Cruces
700 N. Main
Las Cruces, NM 88001

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Part C
Title VI
Complaint Form



City of Las Cruces®

PEOPLE HELPING PEOPLE

City of Las Cruces/RoadRUNNER Transit
Ciudad de Las Cruces/Tránsito Público de RoadRUNNER
Title VI Complaint Form
(Forma de Queja para el Título VI)

The City of Las Cruces/RoadRUNNER Transit is proud to serve you. If you believe, however, that you have been denied Federal Title VI protections or benefits of RoadRUNNER Transit's services, on the basis of your race, color, or national origin, then a written complaint may be addressed as follows:

Title VI (EEO/ADA) Coordinator
RoadRUNNER Transit
P.O. Box 20000, Las Cruces, NM 88004.
Phone: (575) 528-3227 Fax: (575) 541-2545

La Ciudad de Las Cruces/El Departamento Tránsito Público de RoadRUNNER se enorgullece de servir. Mas sin embargo, si usted cree que le han negado protección o beneficios del programa federal Título VI por medio de los servicios de Transporte RoadRUNNER, y este fue debido a su raza, color, o origen nacional, usted puede presentar una queja por escrito dirigida a:

*Title VI (EEO/ADA) Coordinator
RoadRUNNER Transit
P.O. Box 20000, Las Cruces, NM 88004
Phone: (575) 528-3227 Fax: (575) 541-2545*

Contact Information (*Información de Contacto*)

Name/Nombre: _____

Address/Dirección: _____

City/Ciudad: _____

State/Estado: _____ Zip Code/Código Postal: _____

Telephone Number/Número de Teléfono: (____) _____

Best time to call/Mejor hora para llamar: _____

Email/Correo Electrónico: _____

Were you discriminated against because of.../¿Fue discriminado debido a su:

- Race/Raza
- National Origin/Origen Nacional
- Color/Color

Explain as clearly as possible what happened and how you were discriminated against. Tell who was involved. Be sure to include the names and contact information of any witnesses. If more space is needed please attach additional sheets of paper.

Explicar lo más claramente posible lo que pasó y cómo fue discriminado. Decir quién estaba involucrado. Asegúrese de incluir los nombres y información de contacto de cualquier testigos. Si necesita más espacio, adjunte hojas adicionales.

Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? ¿Ha presentado esta queja ante cualquier otra agencia (federal, estatal, o local), o otro tribunal federal o estatal?

- No
- Yes/Sí

(If yes, check all that apply/En caso afirmativo, marque lo que corresponda)

Agency/Agencia: Federal State/Estatal Local

or/o Court/Tribunal Federal State/Estatal Local

Please provide information about a contact person at the agency/court where the complaint was filed. *Servanse proporcionar información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.*

Name/Nombre:

Address/Dirección: _____

City/Ciudad: _____

State/Estado: _____ Zip Code/Código Postal: _____

Telephone Number/Número de Teléfono: (____) _____

Please sign below. You may attach any written materials or other information that you think is relevant to your complaint. *Por favor firme abajo. Usted puede incluir cualquier material escrito o cualquier otra información que considere relevante para su queja.*

Signature/Firma

Date/Fecha

**Part D
Title VI
List of Transit-Related Title VI Investigations,
Complaints, and Lawsuits**

	Date (Month, Day, Year)	Summary (Include basis of complaint: Race, Color, or National Origin)	Status	Action(s) Taken
Investigations	None received			
1.				
2.				
Lawsuits	None received			
1.				
2.				
Complaints	None Received			
1.				
2.				

Includes previous three (3) years beginning August 1, 2010.

Part E
Title VI
Public Comment and Public Participation -- Title VI Policy
City of Las Cruces RoadRUNNER Transit

Transportation is an essential life function that contributes to the livability of our community. The City of Las Cruces (City)/RoadRUNNER Transit does not discriminate on the basis of race, color, limited English proficiency (LEP) or national origin. Additionally, it is the City's policy to not discriminate on the basis of age, religion, ancestry, sex, sexual orientation, gender identity, income, serious medical condition or disability. Furthermore, under Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d), the City, which is the recipient of Federal Transit Administration (FTA) funds, must ensure that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program, or activity receiving federal financial assistance. The grantee must ensure that federally supported transit services and related benefits are distributed in an equitable manner.

RoadRUNNER Transit has adopted the Las Cruces Metropolitan Planning Organization's (MPO) Public Participation Plan. This makes sense because the MPO is the primary planning arm for RoadRUNNER Transit. The MPO engages the same community as RoadRUNNER Transit and has the expertise in conducting public involvement. Because RoadRUNNER Transit services have been relatively static during its 25 years of operation, public participation experiences are limited. Because public participation activity is a primary function of the MPO, their expertise assists the Transit Section when opportunities for engaging in meaningful public participation to occur. The City is the agent for the MPO, both Transit Section staff and MPO employees are City employees. Additionally, RoadRUNNER Transit has had a policy since 1994 outlining the process for receiving public comment on fare and service changes. Finally, RoadRUNNER Transit also offers a variety of public notification and access methods as required under the Americans with Disabilities Act (ADA).

This document outlines policies and procedures for pertaining to public participation and public notification that the RoadRUNNER Transit will observe to ensure compliance with Civil Rights Title VI regulations that are required by recipients of FTA funding. These Title VI policies are intended to complement **and serve as an adjunct to** existing MPO Public Participation and Public Notification Plans used by the Transit Section.

Objectives of this Title VI Public Notification and Public Comment Policy

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;

- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

Promoting Inclusive Public Participation

In order to integrate into community outreach activities, considerations expressed in the Department of Transportation (DOT) Order on Environmental Justice, and the DOT LEP Guidance, the City of Las Cruces/RoadRUNNER Transit will seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. RoadRUNNER Transit shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.

Effective Practices for Fulfilling the Inclusive Public Participation Requirement

The FTA states that grant recipients have wide latitude to determine how, when, and how often specific public involvement measures should take place, and what specific measures are most appropriate. The FTA advises recipients to make these determinations based on the composition of the population affected by the recipient's action, the type of public involvement process planned by the recipient, and the resources available to the agency. Efforts to involve minority and low income people and populations in public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income people and populations from effectively participating in a recipient's decision-making process. Effective practices include:

- Coordinating with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities;
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments;
- Using locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities;
- Using different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities, so that communications are tailored to the particular community or population; and
- Implementing DOT's policy guidance concerning recipients' responsibilities to LEP persons to overcome barriers to public participation.

Providing Meaningful Access to Limited English Proficiency (LEP) Persons

In Las Cruces, an important consideration when inviting public participation is that a significant number of residents, and therefore potential users of public transit services, have Limited English Proficiency (LEP). Based on the Four Factor Analysis using guidelines provided by FTA, completed in August 2010, it has been determined that Spanish speakers who speak English "less than well" make up a statistically significant portion of the population and of transit riders. Certain census precincts have higher proportions of LEP individuals and individuals in those areas could require additional outreach techniques. The service areas with statistically significant populations of Spanish speakers who speak English "less than well" are outlined in the Four Factor Analysis document. There are no other language groups in the service area who have significant populations that speak English "less than well". Year 2000 Census data was used, as this information is not yet available from the year 2010 Census.

The census data also shows that although there are a high number of individuals in the service area who speak Spanish at home, many also speak English well. Many Spanish speakers in this community are fluently bilingual. This community characteristic is also reflected the Transit Section work force where the majority of employees are bilingual.

In order to provide more meaningful access to populations of Spanish speaking individuals in the service area who speak English "less than well", RoadRUNNER Transit, will take the following actions:

- Provide bus schedule and Dial-a-Ride information that is in both English and Spanish;
- Because the Transit Section has many bilingual employees, customers that do not speak English well can almost always be referred immediately to an employee who does speak Spanish;
- When hiring customer service and driving staff RoadRUNNER Transit states that, the ability to communicate in English and Spanish is highly desirable;
- Provide a link on the City of Las Cruces/RoadRUNNER Transit website for Spanish readers to know how to obtain information in Spanish;
- When practical, provide notices of public meetings in both English and Spanish, with information on how to request interpretive services and request translation of written material into Spanish;
- When public meetings are held regarding transit planning, service changes, and fare changes, information will be provided in Spanish; and
- As noted in the Four Factor Analysis, when practical, churches and social services agencies will be contacted to help spread information about important public meetings.

Notification of Rights under Title VI

RoadRUNNER Transit will publish notification of people's rights under Title VI in both English and Spanish in the following locations:

- On all printed bus schedules,
- Inside all Transit Buses
- Central Intermodal Facility (when completed), and
- On the Transit website

Contents of the notification will include:

- A statement that the City operates programs without regard to race, color, and national origin.
- A description of the procedures that members of the public should follow in order to request additional information on City's nondiscrimination obligations.
- A description of the procedures that members of the public should follow in order to file a discrimination complaint against the City.

Process for Filing a Title VI Complaint

- The City of Las Cruces' ADA/EEO coordinator will receive and track complaints.
- A bilingual (Spanish/English) Title VI complaint form with instructions on how to submit the complaint is available at the Transit office and on the Transit Website.
- A response to the complaint will be provided by the City.

Process for Tracking Title VI Complaints

The City's ADA/EEO Coordinator shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the City that allege discrimination on the basis of race, color, or national origin. This list shall include the date of the 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 City in response to the investigation, lawsuit, or complaint.

Title VI Considerations on Construction Projects

In order to integrate, into environmental analyses, considerations expressed in the Department of Transportation (DOT) Order on Environmental Justice, the City will integrate an environmental justice analysis into their National Environmental Policy Act (NEPA) documentation of construction projects in which NEPA documentation is required when preparing documentation for a categorical exclusion (CE) the City will meet this requirement by completing and submitting FTA's standard CE checklist, which includes a section on community disruption and environmental justice. When preparing

an environmental assessment (EA) or environmental impact statement (EIS), the City will integrate into their documents the following components:

- A description of the low income and minority populations within the study area affected by the project, and a discussion of the method used to identify this population;
- A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low income populations;
- A discussion of all positive effects that would affect the identified minority and low income population, such as an improvement in transit service, mobility, or accessibility;
- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects;
- A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- For projects that traverse predominantly minority and low income and predominantly non-minority and non-low income populations, a comparison of mitigation and environmental enhancement actions that affect predominantly low income and minority populations with mitigation implemented in predominantly non-minority or non-low income populations. If the City should determine there is no basis for such a comparison, it will describe why that is so.
(November 1, 2011)

Part F
Title VI
Limited English Proficiency (LEP) Four-Factor Analysis
City of Las Cruces, RoadRUNNER Transit
by
Michael Bartholomew, Transit Administrator
August 9, 2010
(updated August 12, 2013 with revised census data)

1. The Number and Proportion of LEP Persons Service or Encountered in the Eligible Service Population.

a. Task 1, Step 1 – Examine prior experience with LEP individuals

In 2010 City of Las Cruces (City) RoadRUNNER Transit employees (40 of 55 employees responding) were asked to estimate for every 100 customers they encountered, the number of customers that they felt spoke English “not well” or “not at all”. The responses varied widely, but the average of the responses was that 30 of every 100 customers they encountered had difficulty with spoken English. Employees who have more face-to-face contact with customers suggested higher estimates than employees who interacted with customers over the telephone. Employees indicated that except for a very few customers, all or almost all customers who could not speak English well were Spanish speakers.

The language capabilities of customers are not formally tracked in any of the functions that transit performs. The responses were all based on “gut instinct”. Employees who responded represented all aspects of transit services including customer service, fixed-route employees, paratransit employees, and maintenance employees.

b. Become familiar with the data from the U. S. Census and other sources

i. Identify the geographic service area

The City of Las Cruces RoadRUNNER Transit provides fixed-route service within the city limits, New Mexico State University (which is state-owned property not under the jurisdiction of the City), and portions of the Town of Mesilla. Currently there are no services into unincorporated areas of Doña Ana County. The City also offers a paratransit service that serves all areas within the city limits and the NMSU campus. In the Town of Mesilla, the paratransit service area is within $\frac{3}{4}$ - mile of the fixed route service. Residents from unincorporated urbanized areas around the city do come into the city to access transit services. The population within the service area is approximately 128,600.

Las Cruces has a long history with many families able to trace their roots to early Spanish settlers in the area. Census data also shows that there is a significant influx of Spanish speaking immigrants in Las Cruces. Many residents of the community are bilingual in English and Spanish.

ii. Obtain Census data on LEP populations

Three sources of Census LEP data were examined:

- 2010 US Census data
- 2000 US Census data
- American Community Survey (ACS) 3- year estimates, 2009, - 2011, for Las Cruces and Doña Ana County, including this data:
 - Households with no one over Age 14 and over speaks English only or speaks English “very well” (S1602 and B16002)
 - Language spoken at home by ability to speak English for the population 5 years and over (Hispanic or Latino) (C16006)
 - Means of transportation to work by language spoken at home and ability to speak English ((B08113)

Some of the detailed language census data by census tract is not yet available from the 2010 US Census, so this analysis still relies on 2000 Census Data. Appendices A and B provide summaries of the 2000 and 2010 US Census data and the 2009-2011 ACS 3-year estimates..

iii. Analyze the data collected

The ACS data suggests that within the Las Cruces MSA, about 37.2% of persons speak Spanish in the home. When compared with persons who speak English at home a much greater proportion of persons who speak Spanish at home live below the poverty level. Also only 58% of persons age 25 or more who speak Spanish at home has more than a high school education. This might indicate that LEP populations tend to have lower income and would potentially have greater needs for public transportation.

The 2010 census data and the ACS 2009-2011 estimates shows that Spanish is by far the most common language spoken in the home in the RoadRUNNER Transit service area. English is used at home by 60.2% of the population and Spanish is used at home by 37.2% of the population. All other languages combined makeup only 2.6% of the population who speak a language other than English or Spanish at home. Individuals who speak Spanish at home AND who speak English less than “very well” make up 8.5% of the population; however of remaining individuals who speak languages other than English or Spanish at home, only 0.6% speak English less than “very well”. (This information is shown in the chart

below, which is found on the US Census website.) In the service area, Spanish speakers make up the only group that has significant numbers of individuals who are not proficient in English.

**DP02. Profile of Selected Social Characteristics: 2009 – 2011
American Community Survey 3-Year Estimates
Geographic Area: Las Cruces city, New Mexico**

Subject	Number	Percent
Language Spoken at Home		
Population 5 years and over	90,727	100.0
English Only	54,618	60.2
Language other than English	36,109	39.8
Speak English less than "very well"	8,244	9.1
Spanish	33,788	37.2
Speak English less than "very well"	7,718	8.5
Other Indo-European Languages	1,465	1.6
Speak English less than "very well"	291	.3
Asian and Pacific Island Languages	627	.7
Speak English less than "very well"	235	.3

American Community Survey (ACS) data indicates about 37.2% of Las Cruces residents speak Spanish at home indicating there are approximately 34,000 people in the service area that speak Spanish at home. Data indicates that approximately 8.5% (7,700) are Spanish speaking residents that would have Limited English Proficiency. This represents about 8.4% of the total population reported by the 2010 census for the Las Cruces city area.

The fact that City Transit employees feel that a much higher percentage of the persons they encounter have Limited English Proficiency, could indicate that (1) LEP populations are more likely to use transit services and therefore encounters between LEP persons and Transit Staff are more frequent and (2) LEP populations in the census data may be underreported.

It should also be noted that over 75% of the RoadRUNNER Transit employees indicated in the same survey that they are capable of conversing with customers in Spanish. This includes many employees who themselves regularly use Spanish at home. The demographics of our employees are a reflection of the demographics of the city as a whole. Because of the bilingual capabilities of many customers and transit employees, it is possible both parties find it natural to converse in Spanish even if they are equally capable of having a conversation in English if required. This may make it more difficult to assess the true level of English proficiency of RoadRUNNER Transit customers based on

employee perceptions. Interestingly, bilingual Transit employees estimated the number of LEP customers to be much higher than the estimates of employees who do not speak Spanish.

iv. *Identify any concentrations of LEP persons within your service area*

Individual census tracts for the 2000 Census were also examined to see which tracts are likely to contain higher percentages of people who are not fluent in English. Five census tracts in the older "core" of the city had significantly higher proportions of speakers who were not fluent in English. This area is roughly bounded on the west by the railroad tracks, on the east by Interstate 25, to the north by Madrid Street and the south by Idaho Street. Those centered along the Mesquite District were the highest with up to 14.7% of the residents not fluent in English. An isolated census tract which includes the far northeast portion of Las Cruces (east of Sonoma Ranch and north of Highway 70) also has a significant population (about 13%) who do not speak English well or at all. (See Map and Tables in appendix)

v. *Consult state and local sources of data*

In 2006, the City of Las Cruces' Community Development Department commissioned a study of impediments to fair housing choices. This study was performed to comply with U. S. Housing and Urban Development (HUD) program requirements. The report is entitled "City of Las Cruces Consolidated Plan, FY2006-2010, and Analysis of Impediments to Fair Housing Choice". It examined the same U. S. 2000 census that is discussed later in this report. It provides the following notes about English proficiency among economically disadvantaged residents:

- A disproportionate number of homeless individuals in the community are not fluent in English.
- 1,928 households (7% of all households) are "linguistically isolated", that is no one in the household over the age of 14 is fluent in English.
- Of those linguistically isolated households, 1850 households (96%) speak Spanish at home.
- Telephone surveys for this study were offered in Spanish or English; of 395 callers surveyed, 4% chose to do the survey in Spanish.
- The study included two separate surveys of homeless individuals in both English and Spanish. In one survey of 222 people, 27% were not fluent in English. In the second survey, 176 people were interviewed and 22% were not fluent in English.
- During surveys of 3 neighborhoods, it was estimated that 12% of households in the areas surveyed would be linguistically isolated based on U.S. Census block data. Surveyors found that in most

households, there was someone who could speak English and that only 3 households of 337 interviewed required the interview to be done in Spanish.

- vi. *Identify and reach out to community organizations to get information about LEP individuals in the community.*

The City of Las Cruces has not yet formally reached out to community organizations for the specific purpose of identifying and reaching out to LEP persons relative to transit services. We do interact regularly with various social service agencies whose clients include LEP individuals, most notably the City's own Senior Programs. The City also interacts regularly with the Community of Hope which is an organization that provides services to the homeless. A staff member of this organization recently served on the City's Transit Advisory Board. Other service agencies that interact frequently with RoadRUNNER Transit include New Mexico Works and Ben Archer Clinic (TANF and Job Access/Reverse Commute providers) and Dierson Charities.

A resource that has not been used, but will be in the future, is the Interagency Council. This is an informal network hosted by the United Way of Southern New Mexico for various community organizations, including human services organizations.

2. The Frequency with Which LEP Individuals Come into Contact with Your Programs, Activities and Services.

- a. *Review the relevant programs, activities, and services you provide:*

This is described in Section 1bi above.

- b. *Review the information obtained from community organizations:*

As noted earlier, RoadRUNNER Transit has not routinely reached out through community organizations to identify the needs of LEP persons.

- c. *Consult directly with LEP persons:*

The City has not conducted specific focus groups with LEP persons, although employee experience with LEP persons was noted in 1a.

3. The Importance to LEP Persons of Your Program, Activities and Services.

- a. *Identify your agencies most critical services*

The City's most critical transit services are is fixed route bus service and ADA paratransit service, which is also available to the City's Senior Programs' participants. Public transportation is critical for many city residents for medical purposes, food purchases, and work. An inability to communicate well in English regarding the transit services can affect the safety, health, and economic well-being of LEP residents.

b. *Review the input from community organizations and LEP persons*

There has not been formal interaction with community organizations relative to LEP persons. It has long been recognized that there is a need to provide information in Spanish to transit users in Las Cruces. This is supported by prior LEP experiences noted in the Transit employee's survey referred to in section 1a and 1biii, which indicate that a significant number of customer contacts are with LEP persons. This information combined with census data, indicates that LEP persons are frequent transit users and contact is proportionally higher than the general population. While census data shows concentrations of Spanish speaking LEP persons in some census tracts, there is a measurable concentration of LEP persons throughout the community.

4. The Importance to LEP Persons of Your Program, Activities and Services.

a. *Inventory language assistance measure currently being provided, along with the associated costs:*

- There are a variety of measures by which RoadRUNNER Transit provides information in Spanish. The costs, generally minimal, shown below are estimates of the incremental difference from providing English only information.
- Printed bus schedules are in Spanish and English. This includes the Title VI advisements (\$3000.00 per printing of 50,000 schedules; reflects translation and additional space requirements)
- Printed informational brochures for the Dial-a-Ride service are in Spanish and English. (\$100.00)
- Cautionary signage in revenue vehicles are in Spanish and English. (\$0 – this is specified in original vehicle orders)
- Over 75% of Transit staff can converse with customers in Spanish. The ability to speak Spanish is not a job requirement, but is defined as a desirable skill. The high percentage of bilingual employees is a reflection of the overall high level of bilingualism in the local population. An estimated 5% - 10% of daily contacts are done in Spanish. (\$0)
- Meeting agenda notices includes that following information: *Este documento está disponible en español llamando al teléfono de RoadRUNNER Transit : 541-2500 (voz) o 541-2541 (TTY)* (\$0)
- Radio announcements of promotional events, for example "Fare-Free Week", are also done on a popular local Spanish language radio station. (\$350.00 for 2-week promotion)

- In 2008-2009 RoadRUNNER Transit implemented route realignments and a fare increase. Printed Information which also sought comment for both events was available and notice of public comment was placed in a regional Spanish language paper, *El Diario*. (\$300.00 per notice plus \$150 for translations)
 - Due to the relatively few service changes or fare increases since the inception of RoadRUNNER Transit in 1986, relatively few public meetings regarding RoadRUNNER Transit are held. However, when these do occur, translation and interpretation services are often available. Each year the City contracts with several translators/interpreters to be available for use by any Department of the City. Historically requests for such services are very rarely made. (Costs vary based on the extent of services and frequency of need.)
- b Determine what, if any, additional services are needed to provide meaningful access.*

- Notice of the availability of Spanish language translations and interpretation services should be more aggressively pursued, especially for public notifications of fare increases and service changes.
- Be more proactive of putting Spanish language notifications in the print media. There can be several days lag time in getting translations done.
- Ability to distribute short-notice notifications in Spanish of route changes (detours, bus stop closures, service interruptions) that would have an immediate effect on LEP persons.
- A Spanish language website has been discussed but determined to be prohibitively labor intensive to maintain.

c. Analyze your budget

The City Transit services have traditionally had extremely small budgets for all marketing and outreach, generally 0.1% - 0.2% of the total operating budget. The dollars that can be allocated to provision of services to LEP persons is extremely limited to just a few hundred dollars per year. Measures to address LEP access are limited to a few small translations per year. Interpretive services are almost never used or requested. RoadRUNNER Transit heavily relies on the bilingual skills of the majority of its staff.

d. Strategies for cost effective practices for providing language services:

Overall, for a small transit agency the City of Las Cruces RoadRUNNER Transit is reasonably effective in outreach to LEP persons, which in this community are primarily Spanish-speaking persons. LEP persons are offered numerous opportunities to receive assistance in Spanish through notices in the bus schedules and meeting notices. The high percentage of bilingual staff helps with communication with LEP individuals; in most cases, the employees who are English only speakers have ready access to other staff members who are bilingual.

Few changes from current practices are necessary. The service is expected to grow in the future and the need for outreach to LEP persons will need to increase. Most outreach will continue to be "low budget" as the budget for marketing and outreach is not expected to grow in the near future. Primary strategies will be to continue current practices. Emphasis in the future will be to provide ways to more promptly share information with LEP persons. Additionally, going forward we will also plan on taking greater advantage of existing networks of local social services agencies to reach out to Transit users. Finally, the Federal Transit Administration provides many LEP resources on its website. These tools will be evaluated and implemented when feasible.

**Part G
Title VI**

**Table Depicting Minority Representation on Committees and Councils
Selected by the Recipient**

Body	Caucasian	Latino	African American	Asian American	Native American
Population	37.8%	56.8%	2.0%	1.5%	1.0%
Transit Advisory Board	83.4%	16.6%	0%	0%	0%

The Transit Advisory Board (TAB) is a non-standard City of Las Cruces advisory board and consists of seven members appointed by the Mayor with the advice and consent of the City of Las Cruces Council. Board members represent various segments within the Transit user community. The TAB board members represent the following categories: New Mexico State University (named by the university), Doña Ana Community College (named by the college), a representative for the disabled community, a representative for the business community, a representative for the senior citizen community, and two general citizen representatives.

At the time of this submission, one of the general citizen representative positions is vacant. The City is currently seeking applicants for this position and is encouraging minorities to apply.

Part H
Title VI
Service Standards

Vehicle Load – City of Las Cruces Road*RUNNER* Transit has three (3) different vehicles that may be assigned to the fixed route system. Peak and off-peak times do not apply to any of the routes in the system. The vehicle load capacities are: 35 seats plus 11 standing, 32 seats plus 10 standing and 13 seats plus 4 standing. The vehicle load ratio for each vehicle type is 1.3.

Vehicle Headway – Vehicle headway for the City of Las Cruces Road*RUNNER* Transit routes servicing areas other than New Mexico State University is sixty (60) minutes. The vehicle headway for routes operating on New Mexico State University is twenty (20) minutes.

On-Time Performance – A vehicle is considered on time if it departs a scheduled time point no more than five (5) minutes late. The City of Las Cruces Road*RUNNER* Transit's on-time performance objective is 90% or greater. Road*RUNNER* Transit will monitor on-time performance system wide. Results from monitoring will be compiled and available for review on a quarterly basis. Sampling will occur monthly.

Service Availability – The route distribution standard used by Road*RUNNER* Transit is distance between stops. The standard distance between stops is 1/3 mile. Due to right-of-way, easement, terrain and fixed object issues this isn't an absolute; however, Road*RUNNER* Transit makes every attempt to hold to this standard.

Part I
Title VI
Service Policies

Transit Amenities – City of Las Cruces Road*RUNNER* Transit does not have decision making authority over the siting of Transit amenities. Road*RUNNER* Transit has installed and continues to install shelters as jurisdictions and private entities allow. The shelters include canopies, benches and trash receptacles. Additionally, all route stops include signage at each of the bus stop locations. We do try to target locations where the greatest number of people board; however site constraints created by the inability to acquire right-of-way or easements, terrain and fixed objects in actuality have a greater influence in locating bus stops.

Vehicle Assignment – Vehicles are assigned based on availability. Every attempt is made to rotate each vehicle to all routes to even out mileage throughout the fleet.

APPENDIX A

Compilation of Data from the 2010 US Census and the 2009-2011 ACS 3-Year Estimates					
	Las Cruces		Doña Ana County		
		Estimated Population		Estimated Population	
Total Population		97,618		209,233	
Language Spoken at Home (%)					
English	59.1%	57,692	48.7%	101,896	
Spanish	38.1%	37,192	49.1%	102,733	
Other	2.8%	2,733	2.2%	4,603	
% of Total Population that is Hispanic/Latino	56.8%	55,447	65.7%	137,466	
% of Population who is Hispanic/Latino and speaks English at home	20.7%	20,207	16.8%	35,151	
% of Population who is Hispanic/Latino and speaks Spanish at home	36.0%	35,142	48.8%	102,106	
% of Hispanic/Latino population of who speak Spanish at home that speak English "very well"	77.0%	27,060	67.6%	69,023	
% of Hispanic/Latino population of who speak Spanish at home that speak English less than "very well"	23.0%	8,083	32.4%	33,082	
% of population who use public transportation to get to work.	1.0%	976	1.0%	2,092	
% of those that use public transportation to get to work that speak English less than "very well" (all are Spanish speakers)	5.2%	51	20.3%	425	

APPENDIX B
SUMMARY OF YEAR 2000 LEP CENSUS INFORMATION FOR LAS CRUCES BY CENSUS TRACT (PAGE 1)

Community or Census Tract	Las Cruces		Mesilla		1.01		1.02		2		3		4.01	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Bus Route Service: General Area	All Routes		Route 40		Route 10/Eleks area		Routes 10, 70V S of North Main, E of Solano, N of Spruce		Routes 40, 50, EDI/ generally City W of RR tracks		Routes 10, 50, 60/W of of Solano, N of Picacho, E of RR, S at 3 Crosses		Routes 70, 80/W of Solano, N of Amador, E of Mesquite, S of Madrid	
Population (5+) Language spoken at home														
Only English	83182		2146		7295		3628		8138		3200		2749	
Spanish	41211	59.6%	1134	52.8%	4465	61.3%	2368	66.3%	4630	56.9%	2043	63.8%	517	18.8%
Other	25139	37.9%	974	45.4%	2651	36.4%	1226	33.8%	3588	41.6%	1062	33.2%	2189	79.6%
English Proficiency of persons who speak Spanish at Home	1812	2.6%	58	1.8%	168	2.3%	34	0.9%	120	1.5%	95	3.0%	43	1.6%
Well or Very Well	22188	84.9%	879	90.2%	2253	85.0%	1072	87.4%	2768	81.7%	596	84.4%	1785	81.6%
Not Well or Not at all	3951	15.1%	95	9.8%	366	15.0%	154	12.6%	620	18.3%	166	15.6%	403	18.4%
% of Total Pop. "not well" or "at all"		5.7%		4.4%		5.5%		4.2%		7.6%		5.2%		14.7%
Linguistically isolated households	1922	n/a	74	n/a	174	n/a	75	n/a	201	n/a	91	n/a	178	n/a
persons in linguistically isolated households	4223	6.1%	122	5.7%	452	6.2%	166	4.6%	386	4.9%	136	4.3%	394	14.3%

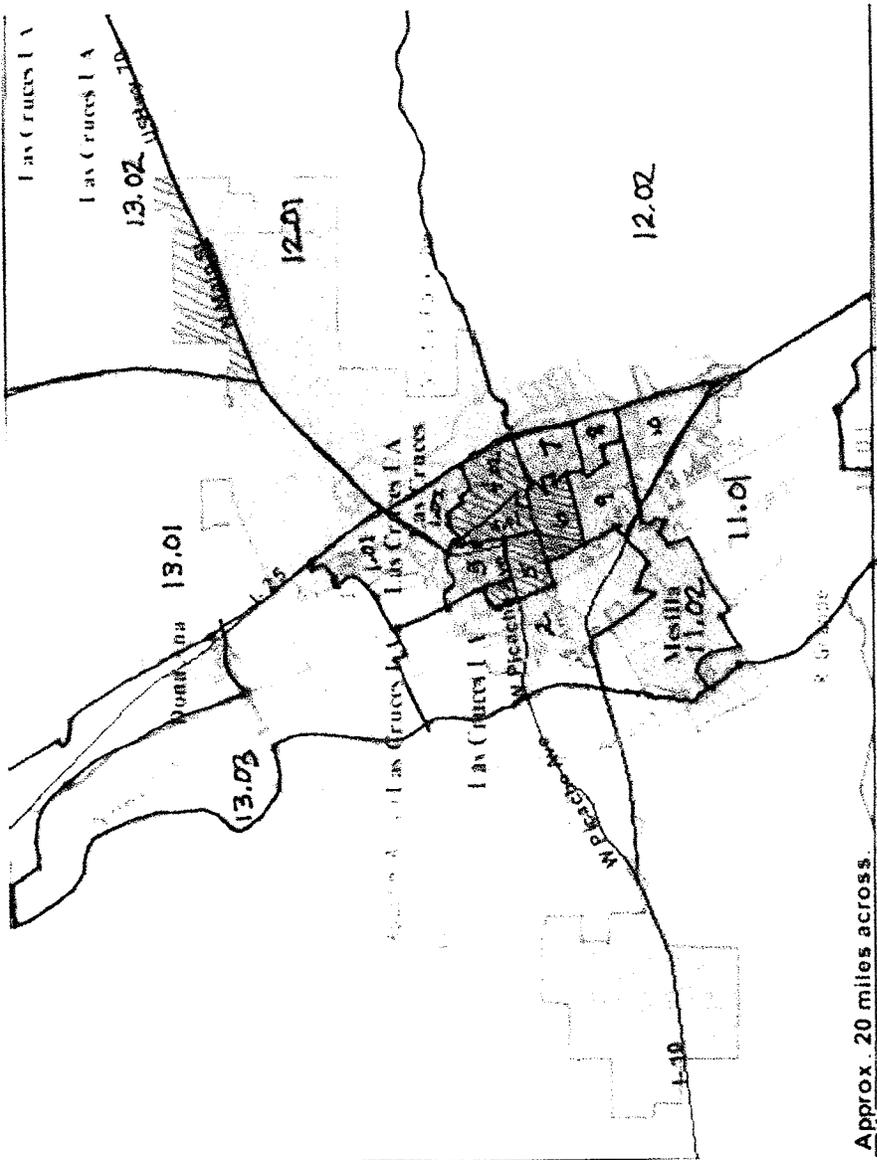
SUMMARY OF YEAR 2000 LEP CENSUS INFORMATION FOR LAS CRUCES BY CENSUS TRACT (PAGE 2)

Community or Census Tract	Las Cruces	4.02	5	6	7	8	9	10
Bus Route Services: General Area	All Routes	Routes 20, 50, W of S. of Amador, E of Solano, S. of Juniper	Routes 10, 50, 60, W of Mesquite, N of Amador, E of Valley, S of Madrid to 2nd, S of Picacho (2nd to Mesquite)	Routes 40, 50, 60, 30, 20, 30, W of Solano, N of Isidro, E of RR, S of Amador	Routes 20, 80, W of S. of Mesquite, E of Locust, S of Amador	Routes 20, 30, E of University, E of Solano, S of Missouri	Routes 20, 30, 40, 50, W of Locust, N of University, E of main, S. of Isidro	Routes 20, 30, Aggie Tramway, PMSU Campus
Population (5+) Language spoken at home								
Only English	69162	5178	2876	2606	5583	3285	6070	2673
Spanish	31211	2665	1200	489	2889	2206	3719	1619
Other	28189	2655	1381	1616	2544	508	2023	726
English Proficiency of persons who speak Spanish at Home								
Well or Very Well	22188	2172	1173	1312	2326	631	1709	643
Not Well or Not at all	3661	472	208	239	319	77	314	77
% of Total Pop. "Not Well" or "at all"	5.7%	9.1%	7.8%	11.2%	5.7%	2.3%	5.2%	3.0%
Linguistically isolated households	1908	228	72	161	226	79	236	30
# persons in linguistically isolated households	4223	384	156	292	501	125	432	76

SUMMARY OF YEAR 2000 LEP CENSUS INFORMATION FOR LAS CRUCES BY CENSUS TRACT (PAGE 3)

Community or Census Tract	Las Cruces	11.01	12.01	17.02	13.01	13.01	13.01	14
Bus Route Service - General Area	All Routes	Routes 20, 40, Only Mesilla Park portion of this tract	Routes 10, 90, E of L 25, S of Hwy 70, N of Lohman	Routes 30, 50, 60, E of 1-25, S of Lohman	Route 10, 50, E of L 25, N of Hwy 70, W of Sanoma Ranch, includes Radium Springs	Route 10, E of Sanoma Ranch, N of Hwy 70	No. of Living Units Sanoma Ranch, El Paso Area and far North Elms	
		# %	# %	# %	# %	# %	# %	# %
Population (5+) Language spoken at home		8028 42.9%	5966 67.6%	10554 77.9%	9013 56.0%	7919 41.5%	6733 60.6%	
	Only English	4254 50.2%	4051 67.6%	8230 77.9%	5008 56.0%	3387 41.5%	4092 60.6%	
	Spanish	3805 46.3%	1709 28.6%	1935 18.9%	3763 42.0%	4602 58.1%	3596 58.5%	
	Other	289 3.5%	206 3.8%	390 3.2%	242 2.0%	30 0.4%	45 0.7%	
English Proficiency of persons who speak Spanish at Home		3373 85.9%	1447 84.7%	1857 93.5%	2310 61.1%	3551 78.0%	2277 87.7%	
	Well or Very Well Not Well or Not at all	552 14.1%	262 15.3%	123 6.5%	473 12.5%	1011 22.0%	319 12.3%	
% of Total Pop. "Not well" or "at all"		6.5%	4.4%	1.2%	6.2%	12.8%	4.7%	
	Linguistically Isolated households	225 6.9%	93 6.9%	88 6.9%	218 6.9%	330 6.9%	119 6.9%	
# persons in linguistically isolated households	568 6.7%	272 4.6%	201 1.9%	569 6.5%	1066 12.7%	190 2.7%		

LAS CRUCES CENSUS TRACTS WITH LEP PERCENTAGES MORE THAN 2% HIGHER THAN CITYWIDE AVERAGE OF 5.7% (note: these areas are hatched)



Approx. 20 miles across.

Appendix C**Title VI Notice to the Public
RoadRUNNER Transit**

- RoadRUNNER Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any Person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with RoadRUNNER Transit.
- For more information on the RoadRUNNER Transit's civil rights program and the procedures to file a complaint, contact (575) 528-3227, (575) 541-2500 or visit our administrative office at 301 West Lohman, Las Cruces, New Mexico 88001. For more information, visit roadrunner.las-cruces.org.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCT, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact (575) 541-2500.

**Título VI Aviso al Público
El Tránsito RoadRUNNER**

- El Tránsito RoadRUNNER opera sus programas y servicios, sin distinción de raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja en El Tránsito RoadRUNNER.
- Para obtener más información sobre el programa de la ciudad de los derechos civiles de Las Cruces y los procedimientos para presentar una queja, comuníquese con (575) 528-3227, (575) 541-2500 o visite nuestra oficina administrativa en el 301 West Lohman en Las Cruces, New México 88001. Para obtener más información, visite roadrunner.las-cruces.org
- Un demandante puede presentar una queja directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Título VI del Programa, East Building, 5th Floor-TCT, 1200 New Jersey Ave, SE, Washington, DC. 20590.
- Si se necesita información en otro idioma, póngase en contacto con (575) 541-2500.