



# Mountain Metropolitan Transit

## 2020 Title VI Program Update

DRAFT July 2020

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## **2020 TITLE VI PROGRAM**

*This Title VI Program is a compilation of documents that demonstrates how the City of Colorado Springs Transit Services Division d/b/a Mountain Metropolitan Transit complies with the Federal Transit Administration's Title VI requirements per Circular 4702.1B.*

Mountain Metropolitan Transit

Transit Services Division

Department of Public Works

City of Colorado Springs

**DRAFT July 2020**

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## INTRODUCTION AND PURPOSE

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

It is the policy of the City of Colorado Springs Transit Services Division (MMT) to comply with the requirements of **Title VI of the Civil Rights Act of 1964** and all related nondiscrimination statutes, regulations, and laws (49 CFR part 21). All recipients of federal funds must ensure that they are in full compliance with Title VI and all related regulations and directives in all programs and activities. To that end, no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of MMT’s programs, policies or activities.

The purpose of this program is to describe how MMT complies with Title VI regulations and to identify the steps that have been and will be taken to ensure that MMT provides services without excluding or discriminating on the grounds of race, color, or national origin, or creating additional barriers to accessing services and activities. Updates to this program will be submitted on a triennial basis.

## CERTIFICATIONS AND ASSURANCES

The MMT Certifications and Assurances are executed annually in FTA’s Transit Award Management System (TrAMS) by the Mayor of the City of Colorado Springs and the City of Colorado Springs General Counsel. The 2020 Certifications and Assurances were executed on May 1, 2020.

## DESCRIPTION OF MOUNTAIN METROPOLITAN TRANSIT

The City of Colorado Springs Transit Services Division (MMT) operates the local public fixed-route bus service, Americans with Disabilities Act (ADA) paratransit demand-response service, and vanpool programs (collectively branded as Mountain Metropolitan Transit), and provides approximately 11,000 trips per day in a service area that includes more than 400,000 people.

The Mountain Metro fixed-route bus service offers 30 bus routes with weekday service and limited Saturday and Sunday service. The routes extend north to Cyprus Semi Drive, west into Manitou Springs, east to Peterson Road and south into Security-Widefield. Metro Mobility is the system’s complementary ADA paratransit service, and Metro Rides is MMT’s Congestion Mitigation and Air Quality (CMAQ) grant-funded alternative transportation program, designed to reduce congestion and pollution by encouraging more people to use carpools, vanpools, bicycling, and other means of commuting.

## CITY COUNCIL APPROVAL DOCUMENTATION

The Title VI Program received a formal recommendation of approval at the Citizen Transportation Advisory Board (CTAB) on July 7 2020 and approval at the Colorado Springs City Council meeting on **September XX, 2020**. The City of Colorado Springs Council-adopted Resolution, **XXXXX**, Approval of Title VI Program Submission to Federal Transit Administration, is shown on the following page.



**INSERT COUNCIL RESOLUTION**

## TITLE VI REQUIREMENTS

As a recipient of federal grant funding, MMT is responsible for the effective execution of nondiscrimination laws and regulations. Federal Transit Administration (FTA) Circular 4702.1B, issued October 1, 2012, together with direction provided by the U.S. Department of Justice, guides MMT's efforts to uphold the basic civil rights of all people in the Colorado Springs Urbanized Area (UZA). The Title VI Program incorporates Chapters III and IV from the Title VI Guidelines for FTA Recipients—Circular 4702.1B that are required of all agencies operating fixed-route transit. Chapter IV of the Circular contains additional requirements for systems operating more than 50 vehicles in peak service in urbanized areas exceeding 200,000 in population.

The Title VI Program is available on the City of Colorado Springs MMT website at [www.mmtransit.com](http://www.mmtransit.com).

The MMT Title VI Program is divided into two parts:

- Part I focuses on general requirements applicable to all FTA recipients.
- Part II focuses on the requirements specific to operators of fixed-route transit service. This section is limited to the planning and operations of MMT.

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# PART I: TITLE VI GENERAL REQUIREMENTS

## TITLE VI NOTICE TO THE PUBLIC

MMT acknowledges the need to notify the public of their rights under Title VI in regard to all its services, projects, and activities. MMT has prepared a Title VI notice to the public including an abridged version of the Title VI Policy statement, a description of how to request additional information regarding MMT's Title VI/nondiscrimination obligations, and a description of how to file a Title VI discrimination complaint.

The formal Title VI Notice in English and in Spanish is included in [Appendix A](#) and is posted in the following locations:

- On the MMT website: [www.mmtransit.com](http://www.mmtransit.com);
- At the MMT Administration Building: 1015 Transit Drive, Colorado Springs, Colorado 80903;
- On public transit vehicles; and
- At main transfer locations and centers.

To reduce the administrative burden associated with the notice requirement, subrecipients who receive federal grant funding from the City of Colorado Springs through a competitive process may adopt MMT's Title VI notices and publications.

### MMT Notice of Public Rights under Title VI

Mountain Metropolitan Transit is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in the receipt of its services on the basis of race, color, or national origin. If you believe you have been subjected to discrimination on the basis of race, color, or national origin, you may file a written complaint no later than 180 calendar days after the date of the alleged discrimination with the MMT Title VI Coordinator by calling 719-385-RIDE (7433), emailing [transitinfo@coloradosprings.gov](mailto:transitinfo@coloradosprings.gov), or contacting us at the following address:

Mountain Metropolitan Transit Title VI Coordinator  
1015 Transit Drive  
Colorado Springs, CO 80903

Additional information regarding protections under Title VI and detailed instructions for submitting a formal Title VI complaint are available on the MMT website at:

[www.coloradosprings.gov/communications/page/title-vititulo-vi](http://www.coloradosprings.gov/communications/page/title-vititulo-vi).

A complaint may also be filed directly with the Federal Transit Administration by submitting it to:

Office of Civil Rights, Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Ave., SE  
Washington DC 20590

## COMPLAINT PROCEDURES

This section provides information on MMT's procedures for filing complaints alleging discrimination on the basis of race, color, or national origin. Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin, or other protected class may file a written complaint with MMT, the Federal Transit Administration (FTA), the U.S. Department of Transportation (USDOT), or the Department of Justice (DOJ).

Further, MMT prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure his or her rights as protected by Title VI. MMT's Title VI complaint form and procedures in English and Spanish are included as [Appendix B](#).

The following procedures cover complaints filed under Title VI of the Civil Rights Act of 1964 for alleged discrimination in any program or activity administered by MMT. These procedures do not affect 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. Informal mediation meeting(s) between the affected parties and MMT may be utilized for resolution.

MMT's process to file and resolve Title VI complaints is as follows:

1. A formal complaint must be filed within one-hundred eighty (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 the alleged discriminating person(s), basis of complaint (race, color, national origin), and the date of the alleged act or acts. A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. The MMT Title VI Complaint form can be found on the website at [www.mmtransit.com](http://www.mmtransit.com), may be requested by calling (719) 385-7433, or by writing:

Title VI Coordinator Mountain Metropolitan Transit  
1015 Transit Drive  
Colorado Springs, CO 80903

2. In the case where a Complainant is unable to provide a written statement, a verbal complaint of discrimination may be made to MMT's Title VI Coordinator, who 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 sixty (60) calendar days to submit the required information. Failure to do so may be considered cause for a determination of no merit.

5. Within fifteen (15) calendar days from receipt of a complete complaint, MMT 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 Transit Services Manager or his/her authorized designee will notify the Complainant and Respondent by registered mail.
  - 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 MMT's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting in the investigation.
6. When MMT does not have sufficient jurisdiction, the Transit Services Manager 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, a complete investigation will be conducted, and an investigative report will be submitted to the Transit Services Manager within sixty (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 investigator will notify the appropriate authorities, and an extension will be requested.
8. The Transit Services Manager or his/her authorized designee will issue letters of finding to the Complainant within ninety (90) calendar days from receipt of the complaint.
9. If the Complainant is dissatisfied with Mountain Metropolitan Transit's resolution of the complaint, he/she has the right to file a complaint with the:

Departmental Office of Civil Rights  
U.S. Department of Transportation  
1200 New Jersey Ave., S.E.  
Washington D.C. 20590  
Phone: (202) 366-4648

## TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

From January 2017 to the present, MMT is not named in any lawsuits or complaints alleging discrimination on the basis of race, color, or national origin with respect to its transit services or transit benefits.

MMT received one Title VI complaint that after initial investigation was determined to be an Americans with Disabilities Act complaint.

<b>Complaint Receipt Date:</b>	September 19, 2018
<b>Summary</b>	Initially filed as a Title VI complaint. Complainant submitted additional narrative that he felt he had been discriminated against based on his disability.
<b>Status:</b>	Closed
<b>Complaint Resolution:</b>	Staff determined the complaint was not due to alleged discrimination based on race, color, or national origin. The Title VI complaint was closed and the matter was handed over to the MMT ADA Coordinator on October 23, 2018.

If any allegations of Title VI discrimination are received during the effective period of this program, records will be kept to include:

- Date the complaint, investigation, or lawsuit was filed;
- Summary of the allegation(s);
- Status of the complaint, investigation, or lawsuit; and
- Responsive actions taken by MMT.

Records of any complaint, investigation, or lawsuit alleging discrimination will be provided to FTA in the triennial Title VI Program update or upon request.

## PUBLIC PARTICIPATION PLAN

Public involvement is fundamental in achieving equitable programs, services, and activities. Public participation provides opportunity for all persons to participate in proposed transit and transportation decisions, regardless of race, color, or national origin, and including minorities, low-income persons, affected public agencies, employees, the general public, transportation providers, public transit users, and other interested parties of the community. Public participation is based on the belief that people whose lives are affected by transportation planning and investment decisions have a right to be involved in the decision-making process and influence choices that are made. Directly engaging citizens in this process promotes successful problem solving, yields diverse voices and new ideas, and gives the public a sense of ownership of the developed solutions.

In our public participation efforts, MMT will strive to find innovative ways to identify and engage the affected public, provide a wide variety of opportunities for interested parties to become involved, and create a meaningful process that is transparent and ensures effective communication about how public contribution influences decisions. It is also important that a public participation process be continually evaluated and improved to ensure that under-represented communities are given a voice. MMT will do such an ongoing process evaluation.

The Public Participation Plan (PPP) is a guide for MMT's public participation efforts. The plan ensures that MMT utilizes effective means of providing information and receiving public input on transportation decisions, (i.e., any future fare or major service changes), from low income, minority and Limited English Proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

### Efforts to Encourage Meaningful Public Participation

Involvement from Title VI, LEP, and Environmental Justice populations is critical to MMT's efforts to maintain services that are well received and relevant. To encourage participation by such populations, MMT should employ strategies targeted to these demographics. For example, a review of the most recent rider survey shows some significant differences in the ways population groups receive information. Overall, approximately one-third of riders surveyed cited bus drivers as one of their key sources of information about MMT ([Table 8 on page 37](#)). However, 38.8 percent of low-income riders cited bus drivers as a source of information compared to only 25.9 percent of non-low-income riders. Other findings of the survey include:

- Minority riders are more likely than non-minority riders to receive information via television and radio while being less likely to receive information via print newspaper or social media.



- Low-income riders are much more likely to receive information from a bus driver, a downtown terminal supervisor, print schedules, and/or print newspaper while they are less likely to receive information via social media, the MMT website, or radio.

Other methods of encouraging minority and low-income population participation include holding meetings at times and locations that are more convenient to those riders. MMT holds the majority of its public outreach meetings at the Colorado Springs City Hall, but also employs a number of alternative locations such as the Pikes Peak Workforce Center, the Citadel Mall, Southeast Armed Services YMCA, Library 21c, and Doherty High School. Locations are selected to be near routes proposed for change or near easily-accessible transfer centers.

MMT has considered public involvement at all levels of planning activities and engages itself in the public involvement process when established criteria are met or special circumstances warrant it. MMT public participation strategy offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transit and transportation decisions.

### **Public Outreach in Planning Activities**

Many of the planning activities in which MMT engages often benefit from public involvement, including but not limited to preparing the Regional Transit Plan, choosing sites for new public facilities, and developing broad operations policies. Other planning activities may warrant limited public engagement, or even no engagement, like efficiency studies, operations analyses, or the siting of transit amenities. Depending on the type of planning activity, MMT seeks input from the public by:

- Forming steering committees of transit riders and other stakeholders for guidance;
- Hosting public meetings, stakeholder meetings, or open houses;
- Disseminating rider surveys; and
- Engaging via social media.

### **Public Outreach in Facilities Changes**

Modifications to transit facilities which impact riders or the general public will be similarly announced based on the magnitude of impact and shall follow one of the processes described above. Construction of new facilities (e.g., operations and maintenance facility, bus garage) will require the completion of a Facility Siting Equity Evaluation.

### **Public Outreach for Service and Fare Changes**

MMT usually conducts at least one annual service change to the fixed-route system, which may also include modifications to aspects of other service modes. Changes to fixed-route service are identified based on careful analysis of rider requests and complaints, service performance assessed against service standards, and available resources.

Service changes are classified into two categories, *Major* or *Minor*, based on the magnitude of the proposed change. As discussed in Part II of this Title VI Program, a *Major Service Change* is defined as a change greater than or equal to 30 percent of operational hours<sup>1</sup> on any route or the addition or elimination of any route within the system. A *Minor Service Change* constitutes changes up to 30 percent of operational hours on any route within the system. MMT shall keep detailed records of service modifications and associated percent changes to operational hours to ensure that incremental changes do not compound to result in a change equal to or greater than 30 percent within the three-year span of this program. If or when a proposed service change will result in a cumulative change equal to or greater than 30 percent, such change shall be classified as *Major* regardless to its percentage change.

In accordance with Circular 4702.1B, all fare changes, including those involving modifications to existing or implementation of new fare media, shall be considered *Major* and will undergo the same public process as a *Major Service Change*.

### ***Major Service Changes***

All Major Service Changes shall require detailed demographic analysis and public involvement. Once a change is identified, MMT performs a Service Change Equity Analysis to determine whether a disparate impact or disproportionate burden is borne by populations protected under Title VI or Environmental Justice regulations, respectively. The details and steps involved in performing the analysis are discussed further in Part II of this program.

If the decision is made to go ahead with the service change, MMT staff will develop a Public Involvement Plan to be reviewed and approved by the Transit Services Manager prior to implementation. If changes to several routes are proposed, one Public Involvement Plan may be developed that addresses outreach for each change. The level and type of public involvement shall be based on the type and location of the change, as well as rider and population demographics, and may include the following outreach strategies:

- Public meetings or open houses, including “Ask Transit” events;
- Social media, email, and/or web engagement;
- Online or paper surveys;
- Telephone or internet town halls;
- Targeted stakeholder meetings; and/or
- Discussions with advisory boards and/or commissions.

In all cases, riders shall be informed of proposed changes and public involvement opportunities as early in the process and in as much detail as possible. Notifications shall, at a minimum, include:

- Pamphlets containing detailed information on the proposed service change and public

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<sup>1</sup> In this context “operational hours” is defined as the time that a bus is providing service to the public, excluding layover/recovery time, deadhead time, or other instances where transit service is not being provided.

involvement opportunities to be placed on buses and at transfer centers and posted to the website;

- On-board announcements notifying riders of proposed changes and where to access information about the proposal;
- Announcements on social media;
- Rider Alerts posted on buses and at main transfer centers; and
- Press releases to local media outlets, including Spanish language media.

Once the public involvement process has concluded, MMT staff shall review and consider all public comments and make reasonable adjustments, if required, prior to recommending a finalized set of changes to the Transit Services Division Manager and Chief of Staff or his/her designee for approval.

MMT shall notify the public of the final changes no less than 30 days prior to implementation. At a minimum, notification shall include:

- Information posted to the website;
- Announcements on social media;
- On-board announcements regarding the changes;
- Notifications on any bus stop to be eliminated;
- Rider Alerts posted on buses and at transfer centers; and
- Press releases to local media outlets, including Spanish language media.

### ***Minor Service Changes***

Any Minor Service Change shall require public notification and shall include, at a minimum:

- Announcements on social media;
- On-board announcements regarding the changes;
- Rider Alerts posted on buses and at transfer centers; and
- Press releases to local media outlets, including Spanish language media.

In cases of unforeseen or temporary service adjustments (detours, construction, etc.), MMT staff shall make every effort to inform riders as early as possible via driver or other on-board announcements, notifications at transfer centers and on buses, and announcements on social media.

Summary of Public Notification Requirements

Public Notification Strategies	Major Service Change	Minor Service Change
Required	<ul style="list-style-type: none"> <li>• Pamphlets containing detailed information on the proposed service change and public involvement opportunities to be placed on buses and at transfer centers and posted to the website;</li> <li>• On-board announcements notifying riders of proposed changes and where to access information about the proposal;</li> <li>• Announcements on social media;</li> <li>• Rider Alerts posted on buses and at main transfer centers; and</li> <li>• Press releases to local media outlets, including Spanish language media.</li> </ul> <p>Discussions with advisory boards and/or commissions</p>	<ul style="list-style-type: none"> <li>• Announcements on social media;</li> <li>• On-board announcements regarding the changes;</li> <li>• Rider Alerts posted on buses and at transfer centers; and</li> <li>• Press releases to local media outlets, including Spanish language media.</li> </ul>
Optional	<ul style="list-style-type: none"> <li>• Public meetings or open houses, including “Ask Transit” events;</li> <li>• Social media, email, and/or web engagement;</li> <li>• Telephone or internet town halls;</li> <li>• Targeted stakeholder meetings; and/or</li> <li>• Discussions with advisory boards and/or commissions.</li> </ul>	<ul style="list-style-type: none"> <li>• Public meetings or open houses, including “Ask Transit” events;</li> <li>• Social media, email, and/or web engagement;</li> <li>• Telephone or internet town halls;</li> <li>• Targeted stakeholder meetings; and/or</li> <li>• Discussions with advisory boards and/or commissions.</li> </ul>

**Public Outreach Efforts**

Since the submittal of the previous Title VI Program in 2017, MMT has conducted a number of routine service changes. Additional alternative forms of outreach undertaken by MMT include its Transit Riders Senior Ambassador Program and general travel training. The purpose of the Ambassador program is to assist senior riders (60 and over) who are new to riding transit or new to the Colorado Springs area. The program relies on volunteers who are available for one-on-one training for senior riders desiring assistance. General travel training is also provided by MMT staff upon request to groups or individuals who wish to learn how to navigate the bus system.

## LIMITED ENGLISH PROFICIENCY ASSESSMENT

### Limited English Proficiency

Limited English Proficiency (LEP) refers to individuals who cannot speak, read, write or understand the English language at a level that permits them to interact effectively.

### Authority

Title VI of the Civil Rights Act of 1964 and its implementing regulations require that recipients of federal funds take responsible measures to ensure meaningful access to benefits, services, information and other important portions of programs and activities are available for individuals who are LEP.

***Title VI of the Civil Rights Act of 1964*** states that no person in the United States 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.

***Executive Order (EO) 13166*** - Improving Access to Services for Persons with LEP (August 11, 2000) sets forth the compliance standards that recipients of federal funds must follow to ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI of the Civil Rights Act of 1964, as amended, and its implemented regulations. Recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

### Limited English Proficiency Policy Statement

MMT believes that communication with all populations, particularly persons who may have LEP, is essential to the effective and equitable distribution of services. It is a policy of MMT to ensure that the programs and activities normally provided in English are accessible to LEP persons and do not discriminate on the basis of national origin.

### Purpose of the LAP

The purpose of the Language Assistance Plan (LAP) is to demonstrate compliance with Title VI of the Civil Rights Act of 1964, and to fulfill the requirements of Executive Order 13166. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the grounds of race, color, or national origin by any entity receiving federal financial assistance. The purpose of Executive Order 13166 is to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language. The LAP addresses access needs of persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.

### Reasonable Steps to Provide Access

Executive Order 13166 directs recipients of federal financial assistance to take reasonable steps to provide LEP persons with meaningful access to their programs, activities and services. The key to

providing meaningful access for LEP persons is to ensure that effective communication exists between the recipient and the LEP person. It is critical that MMT be proactive in informing and engaging individuals from different cultures and backgrounds in community meetings, planning, service and fare changes, and project development. To accomplish effective communication, MMT will perform the following actions:

- Conduct a needs assessment;
- Provide for oral and written language assistance;
- Notify LEP customers of the availability of language assistance services;
- Translate vital documents in languages other than English;
- Train staff; and
- Monitor and update the Language Assistance Plan (LAP).

The LAP uses a four-factor analysis to assess the potential need for language assistance services to MMT customers. This need is weighed against the resources available to determine an appropriate level of language translation and interpretation assistance. LEP is defined as individuals who speak English “less than very well.” MMT currently has only a minimal need for language assistance for the Spanish-speaking population. This need is currently being addressed through a variety of approaches including the provision of Spanish language interpreters when requested.

The purpose of the LAP is to meet these requirements and to further MMT’s commitment to equity. The plan includes an assessment of the LEP needs of the area, an explanation of the steps that are currently being taken to address these needs, and the steps planned to ensure meaningful access to the transit programs by LEP persons.

### **Four-Factor Analysis**

To identify MMT’s LEP needs, a four-factor analysis was conducted that analyzed the following:

1. The number and proportion of LEP persons served or encountered in eligible service populations.
2. The frequency with which LEP individuals come into contact with programs, activities or services.
3. The importance of the programs, activities and services to LEP persons.
4. The resources available to recipients and the costs.

#### ***Factor 1: Number and Percentage of LEP Persons Served***

MMT’s service area covers the City of Colorado Springs, Manitou Springs, areas of unincorporated El Paso County, and the Security-Widefield area. The American Community Survey (ACS) 2018 five-year estimates show the population of persons over the age of five in the Colorado Springs Metropolitan Statistical Area (MSA) who primarily speak a language other than English is 11.67 percent or 77,510. Of

the 11.67 percent population who speak a language other than English, 24,189 persons or 3.64 percent speak English less than “*very well*.” Out of the languages spoken in the MMT service area, Spanish is the most prevalent with 16,085 persons who speak English less than “*very well*,” or 2.42 percent of the total population, as shown on the following table.

Table 1. Individuals with Limited English Proficiency (LEP)

Languages Spoken at Home	Number	% of LEP	% of Pop
<b>Total Population (5 years old &amp; older)</b>	<b>398,543</b>		<b>100%</b>
<b>Speak only English</b>	<b>321,033</b>		<b>88.33%</b>
<b>Speak a Language Other than English</b>	<b>77,510</b>		<b>11.67%</b>
<b>Total - Speak English less than "very well"</b>	<b>24,189</b>		<b>3.64%</b>
Spanish or Spanish Creole	16,085	66.50%	2.42%
Korean	1,715	7.09%	0.26%
Chinese	1,027	4.25%	0.15%
Vietnamese	813	3.36%	0.12%
Tagalog	597	2.47%	0.09%
German	553	2.29%	0.08%
Arabic	531	2.20%	0.08%
Other Pacific Island languages	447	1.85%	0.07%
Other Indo-European languages	398	1.65%	0.06%
French (incl. Patois, Cajun)	295	1.22%	0.04%
Other Languages	1,728	7.14%	0.26%

Source: U.S. Census Bureau, 2014-2018 American Community Survey 5 -Year Estimates

Figure 1. Spanish Speaking Population with Limited English Proficiency (LEP)

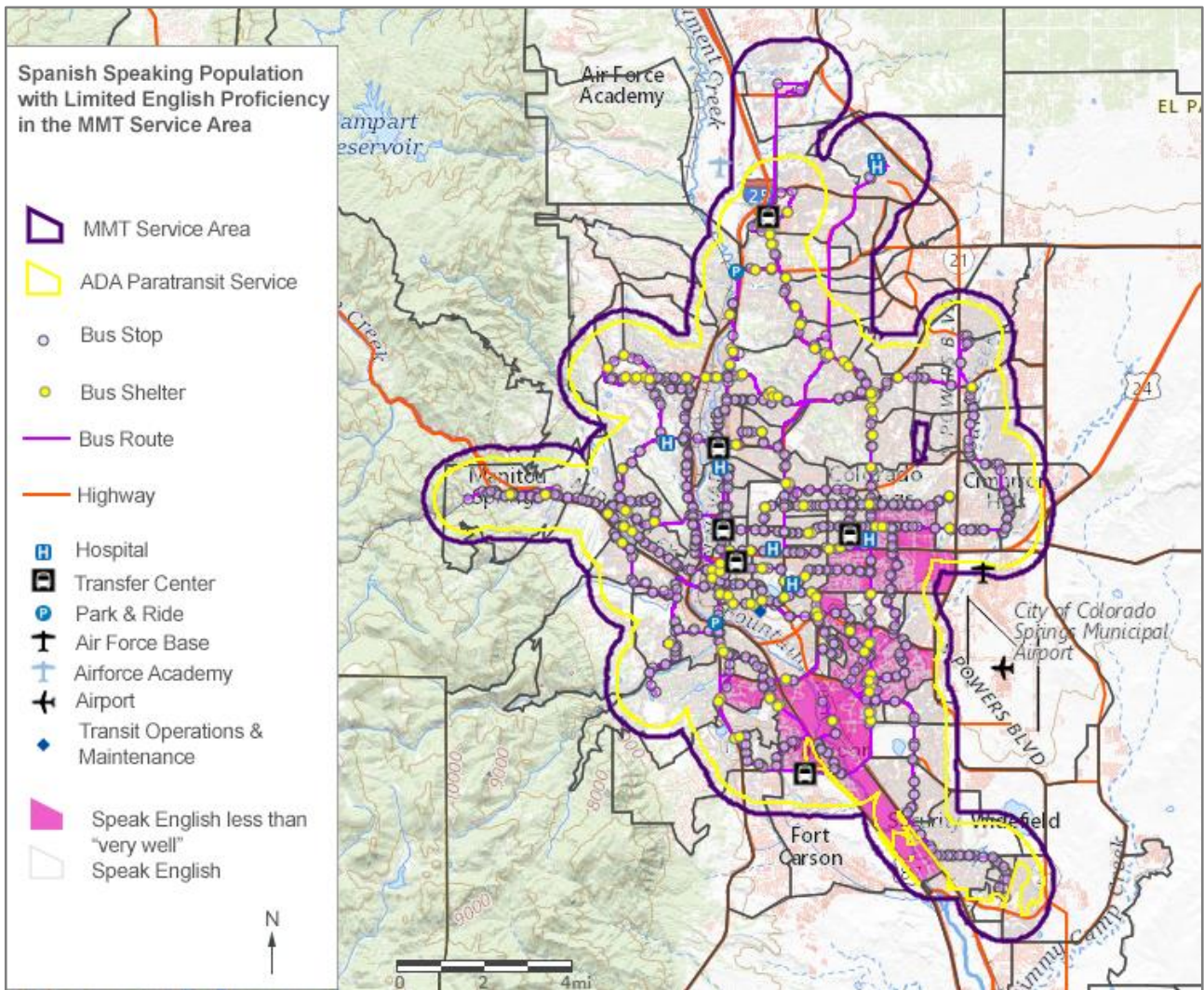


Figure 1 highlights the concentration of Spanish speakers who have limited English speaking ability. These individuals are located in the MMT service area just west and south of the Colorado Springs Municipal Airport.

The FTA encourages transit providers to consider application of the Department of Justice’s (DOJ) Safe Harbor standards to assess the need for translation of vital documents. DOT’s Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.

None of the LEP language groups in the Colorado Springs MSA exceed the five percent threshold. Other than Spanish, only Korean, and Chinese exceed the 1,000-person standard.



### ***Factor 2: Frequency and Importance of LEP Contact***

While the overall need for LEP outreach is relatively small, there is some daily interaction with persons whose principal language is Spanish. The LAP focuses on this population, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances.

In addition to U.S. Census data, MMT gathered internal data from the transit program to establish usage and assistance levels for current passengers. The unweighted 2020 On-Board Survey confirms that 2.8 percent of MMT riders principally speak Spanish. Based on an average of nearly 11,000 passenger trips per day, there is the potential for approximately 265 daily contacts with people who could need language assistance. This result is consistent with the estimated number of interactions based on census data. The number of actual requested instances of need for language assistance is between 100 and 150 times per year, and current communication efforts are meeting passengers' needs.

### ***Factor 3: Nature and Importance of Program or Activity***

Given the small population of persons having difficulty speaking English, LEP contact is relatively low. However, the nature and importance of MMT's service to LEP individuals is still significant because transit use may be recurring or of a critical nature for the LEP population.

### ***Factor 4: Available Resources to Reach LEP Population***

The final component of the four-factor analysis is an inventory of the resources required to conduct targeted LEP outreach. The following resources are used to carry out the LAP:

- Internet services for written translation, including Google Translate on MMT's website;
- Coordination with other agencies that serve LEP populations;
- Staff time as required to maintain LEP activities and outreach efforts;
- Annual review of LEP needs; and
- Coordination with operations staff as needed.

### ***Four-Factor Analysis Summary***

In the triennial period between 2017 and 2020, there has been no significant change in the LEP population or in the frequency of contact or use of MMT's service. Though the need for outreach is relatively small, there is some interaction between MMT and persons whose primary language is Spanish. Further, it is assumed that a number of tourism industry jobs are occupied by people whose primary language is Spanish. MMT has based its language assistance efforts on the Spanish-speaking population, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances and population demographics.

## **LANGUAGE ASSISTANCE PLAN**

### **Ensuring Access for People with Limited English Proficiency**

MMT has developed this Language Assistance Plan (LAP) to help identify reasonable steps to provide

language assistance for LEP persons who seek meaningful access to MMT's programs and services. MMT is able to meet the needs of most LEP individuals by providing language assistance with bi-lingual staff, telephone translation, and face-to-face translation services. MMT will continue to monitor document translation needs for LEP populations and will provide translated documents free of charge to customers as needed or requested. MMT has not received any requests for document translation other than in Spanish.

### **Notification of Language Assistance**

Information regarding free language assistance will be posted in public areas. MMT will notify the Spanish-speaking community that they have the right to free language assistance that includes request for documents and/or materials printed in the Spanish language. Notification regarding the availability of services will be provided through neighborhood community meetings, brochures, news media, and information disseminated to the public by MMT. A copy of the Language Assistance Plan will be posted on the MMT website and provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain a translated copy of the plan upon request.

### **Summary of Language Assistance Efforts**

The current focus of the MMT language assistance efforts are directed at Spanish-speaking persons. To address this market MMT has initiated the following efforts:

- MMT considers bilingual English/Spanish-speakers when hiring customer service representatives.
- MMT has one Spanish-speaking customer service representative on staff during normal business hours who will assist with Spanish translation and other directions when needed. The contact number for this person is 719-385-7433.
- When available, multilingual drivers assist in overcoming language barriers by translating over the radio.
- Prior to public meetings for major service changes, MMT notifies the public of the availability of Spanish language interpreters if staff is notified at least 48 hours in advance of the meeting.
- MMT employees, including bus drivers, operational staff, and planning staff are provided instruction regarding Title VI and language assistance policies and available resources.

### **Ongoing Efforts to Identify and Address LEP Populations**

As part of the ongoing commitment to bridging gaps in communication with LEP persons, MMT will maintain the current LEP outreach efforts as well as the following activities:

- Update census data as it becomes available;
- Regularly review perceived LEP needs with system transit staff and drivers;
- As opportunities arise, coordinate with agencies serving LEP persons which may have resources to share; and

- Document language assistance requests.

### **Staff Training**

Training is provided to staff members on policies and procedures concerning language assistance and ways to determine whether an individual needs assistance services. MMT also provides employees with information on the language accessibility tools available and how to access them to improve customer assistance.

### **Monitoring and Updating the LAP**

Public transportation is vital to many people's lives. A LEP person's inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, education, or access to employment. An effective LAP offers these individuals the mobility to conduct day-to-day activities. MMT's public participation process will strive to continue to improve contact and communication with non-native English speakers. MMT will continue to monitor changes in the demographics and seek feedback from the LEP community. MMT will monitor the LEP efforts annually and update the LAP every three years, or as needed. These efforts will include:

- Review the LAP, making adjustments, as needed;
- Pay particular attention to demographic changes in the area that have the potential to affect LEP strategies;
- Review any LEP-related complaints regularly and develop programs to mitigate them; and
- Post the LAP and subsequent changes on the City of Colorado Springs website.

This triennial update of the four-factor analysis did not reveal any major shifts in the LEP population or the need for additional language assistance measures.

## **MINORITY REPRESENTATION ON PLANNING OR ADVISORY BOARDS**

MMT works with a number of local jurisdictions, boards, and committees to carry out its business and planning efforts. The Citizens Transportation Advisory Board (CTAB), which functions principally as an advisory committee to the City of Colorado Springs Council, is comprised of appointed members (eleven Regular board seats and one Alternate seat). Currently, CTAB consists of eight members, with three vacant seats. Five members reported their race to be Caucasian, one as Asian or Pacific Islander, and the remaining member did not report their race.

### ***Encouraging Minority Participation***

Minority populations are encouraged to join the CTAB and efforts are made to fill vacancies with members who reflect Colorado Springs' diverse population. Vacancies for CTAB seats are advertised by issuing a news release to local media outlets including television stations, radio stations, newspapers, and other print publications as well as notifying various community groups. The advertisement is also

posted on the City website for approximately 30 days.

## PROVIDING ASSISTANCE TO SUBRECIPIENTS

During the 2017-2020 period, MMT had one 5310 subrecipient: Disability Services Inc. (Envida). MMT provides assistance in the development of subrecipients' Title VI Programs, including the Title VI Notice to the Public, the Title VI complaint form, and complaint process.

## SUBRECIPIENT MONITORING

MMT requires subrecipients to submit a Title VI Program, their Title VI complaint process and the Title VI complaints they have received every three years. Federal, state, and local Title VI requirements are included in every grant agreement.

MMT also maintains relationships with a number of third party contractors, and requires them to acknowledge they are aware of federal, state, and local Title VI requirements and that every federally funded contract and subcontract includes clauses required by federal statute and executive orders and their implementing regulations.

The language used in all subrecipient agreements and third party contracts is provided in [Appendix C](#).

## FACILITY SITING

Since the submittal of the previous Title VI Program, MMT has sited one Bus Storage and Administration Facility. A Facility-siting Equity Analysis was completed in August 2018. MMT evaluated four potential sites. The analysis indicated one site with a potential disparate impact and two of the other sites would require mitigation during construction due to the proximity of private residences. MMT selected the site with the least impact, which was being used by the City of Colorado Springs Streets Division for storage of road construction materials and street sweeping debris. A copy of the equity analysis is provided in [Appendix D](#).

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# PART II: TITLE VI FIXED-ROUTE TRANSIT PROVIDER REQUIREMENTS

## SERVICE AREA DEMOGRAPHICS

MMT uses demographic data to assess equity in the distribution of services, facilities, and amenities in relation to minority and low-income populations in its service area. This data informs MMT in the early stages of service, facilities, and program planning and enables MMT to monitor ongoing service performance, analyze the impacts of policies and programs on these populations, and take appropriate measures to avoid or mitigate potential disparities. MMT develops maps overlaying demographic data with services, facilities, and amenities along with comparative charts to perform this analysis. The following set of maps fulfills a requirement of MMT’s Title VI Program and displays the distribution of minority and low-income populations in relation to the facilities and services throughout the MMT service area. For the purposes of this analysis, the MMT service area is defined as census blocks with their centroid within the complementary ADA paratransit three-quarter-mile service area, or census blocks within one-half mile of fixed-routes. An estimated 398,543 people live in the MMT service area, based on 2014-2018 ACS 5-Year Estimates. The number and proportion of minority and non-minority, low-income and non-low-income population in the MMT service area is shown in Table 2.

In order to provide more granularity and detail to the analysis, minority and low-income populations can be estimated at the census block level using a combination of 2014-2018 ACS data and 2010 Decennial Census data. The 201-2018 ACS populations for each block group can be allocated to their corresponding blocks using the proportion of total population for that block and block group found in the 2010 Decennial Census. For example, if the 2010 data showed that a block contained 10 percent of the total population within its parent block group, it was assumed that this block contains 10 percent of the minority and low-income populations estimated in the 2014-2018 data. While this approach assumes that the percentage of minority and low-income populations are uniform throughout the block group, it allows for a more precise analysis than using the block groups as a whole.

Table 2. MMT Service Area Population

Title VI Target Population	MMT Service Area	
	Number	Percent
Total Population	398,543	100%
Minority Population	133,895	33.60%
Non-Minority Population	264,648	66.40%
Low-Income Population	59,924	15.74%
Non-Low-Income Population	338,619	84.31%

Figure 1 displays fixed-route transit services operated by MMT in the service area relative to the distribution of minority populations at the census block level, as based on 2014-2018 ACS and 2010 Decennial Census data. Transfer centers, park-and-ride lots, and major attractions are also shown.

Figure 2: Minority Population in MMT Service Area

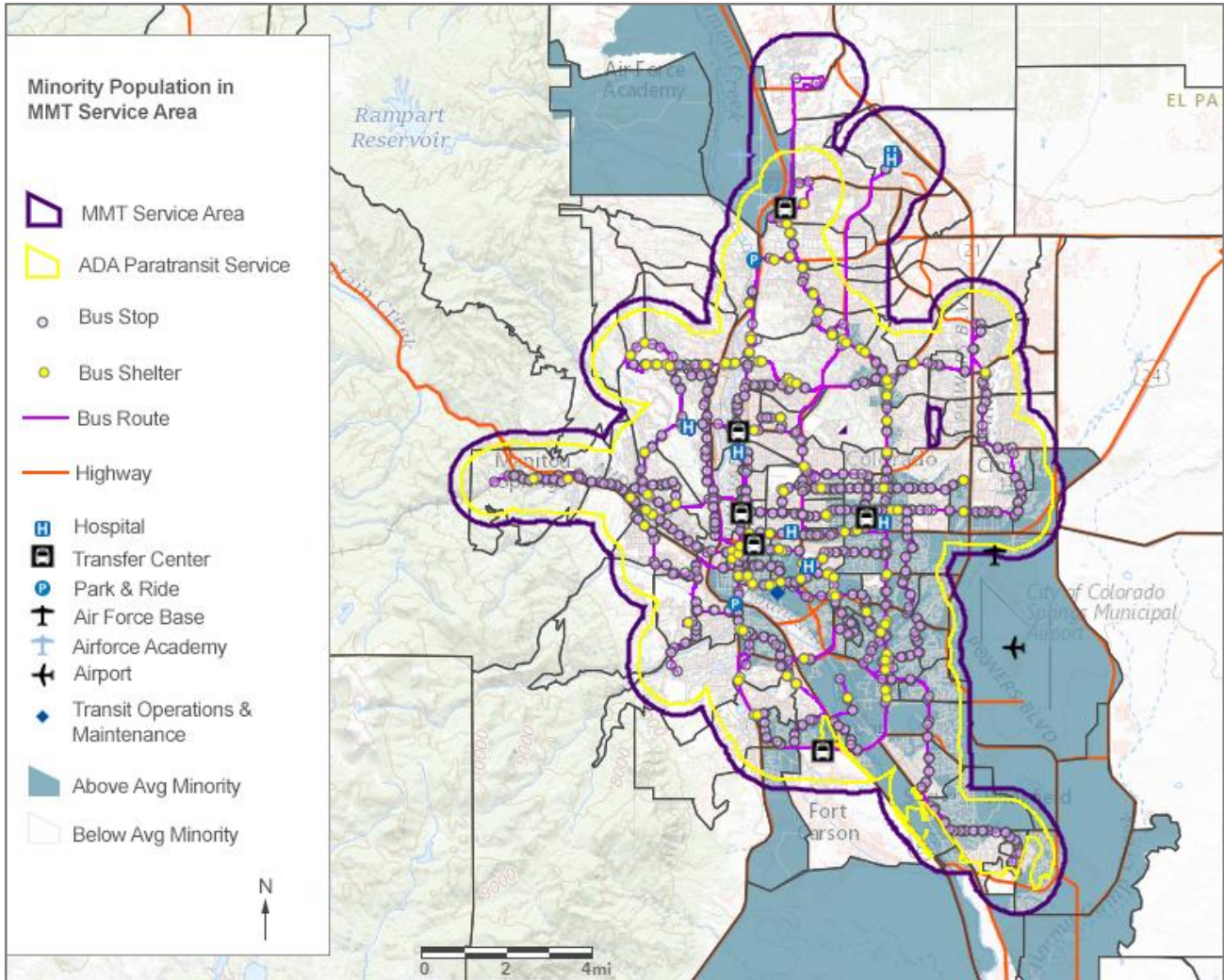


Figure 2 highlights census blocks that have a minority population greater than the service area average (33.6 percent). Concentrations of minority population within the service area are primarily located in the east and southeast parts of the service area.

Figure 3: Hispanic Population in MMT Service Area

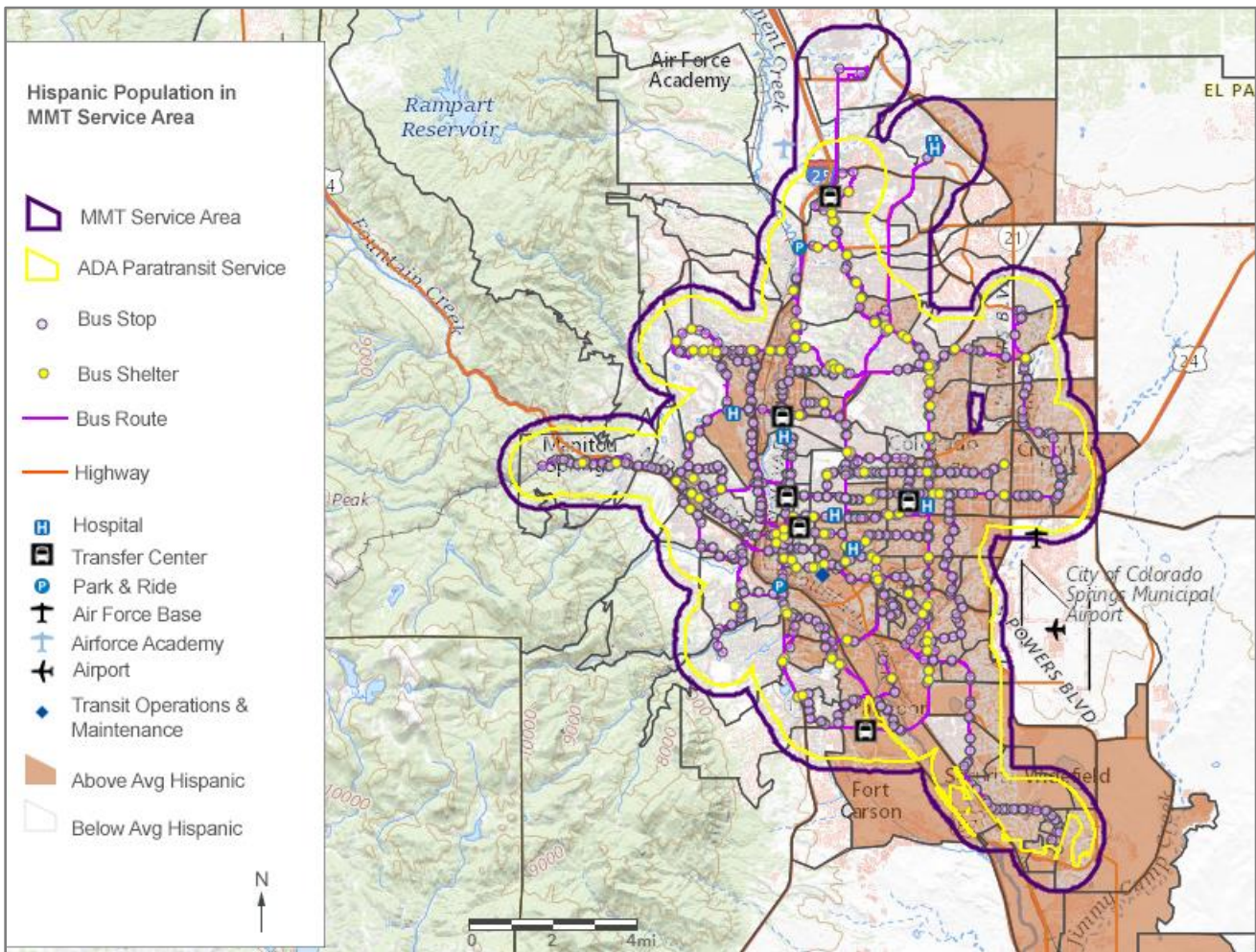


Figure 3 highlights census blocks that have a Hispanic population greater than the service area average (15.6 percent). The Hispanic population is more widely spread but still primarily concentrated in the east and southeast parts of the service area.



Figure 4: Low-Income Households in MMT Service Area

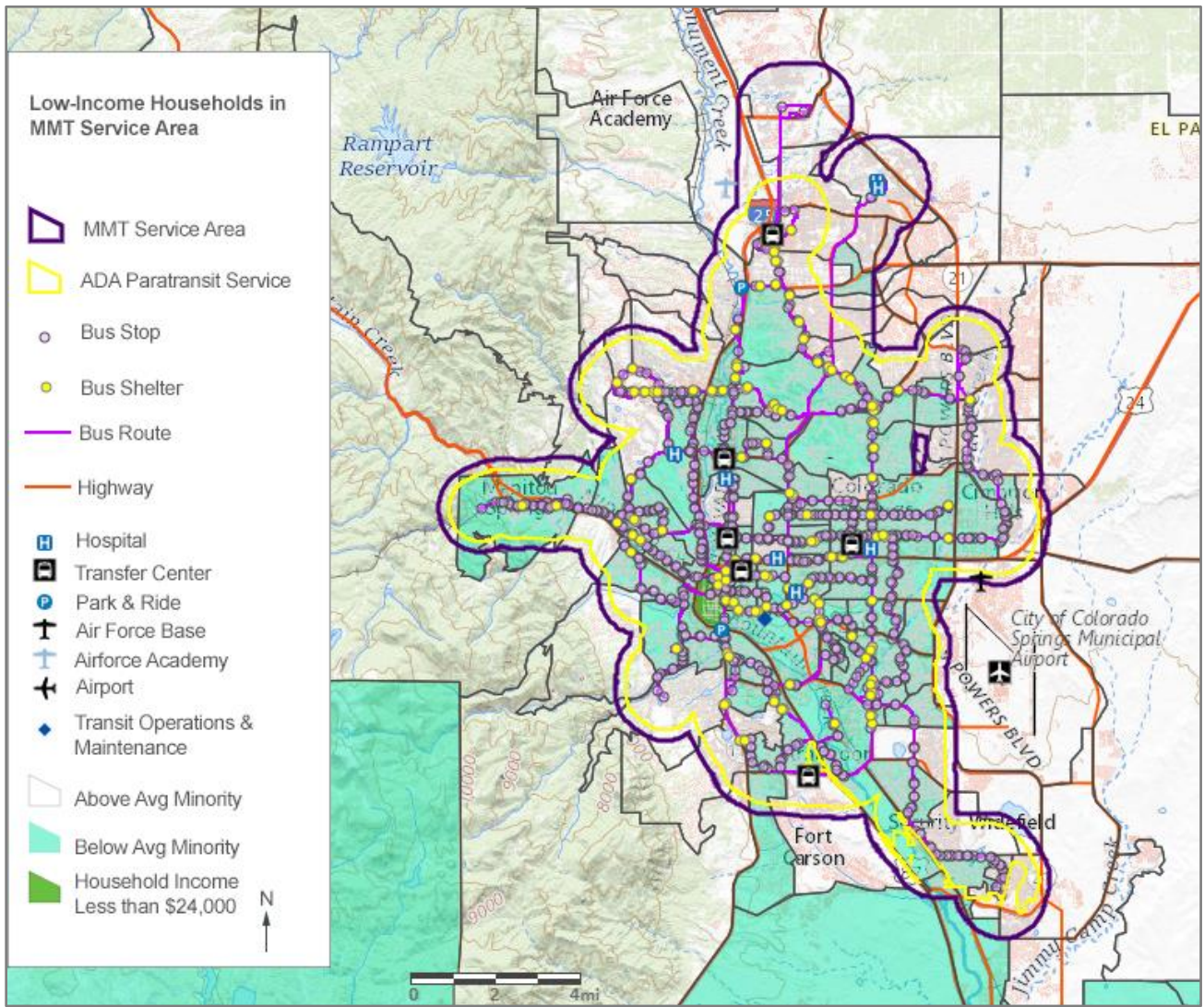


Figure 4 highlights low-income households whose median income is less than the service area median (15.7 percent). Low-income households are dispersed throughout the service area, but with fewer concentrations on the service area periphery. There is a concentration of households earning less than \$24,000 annually located just north of the Tejon Park & Ride and southwest of the Downtown Terminal.

Figure 5: Minority and Low-Income Households in MMT Service Area

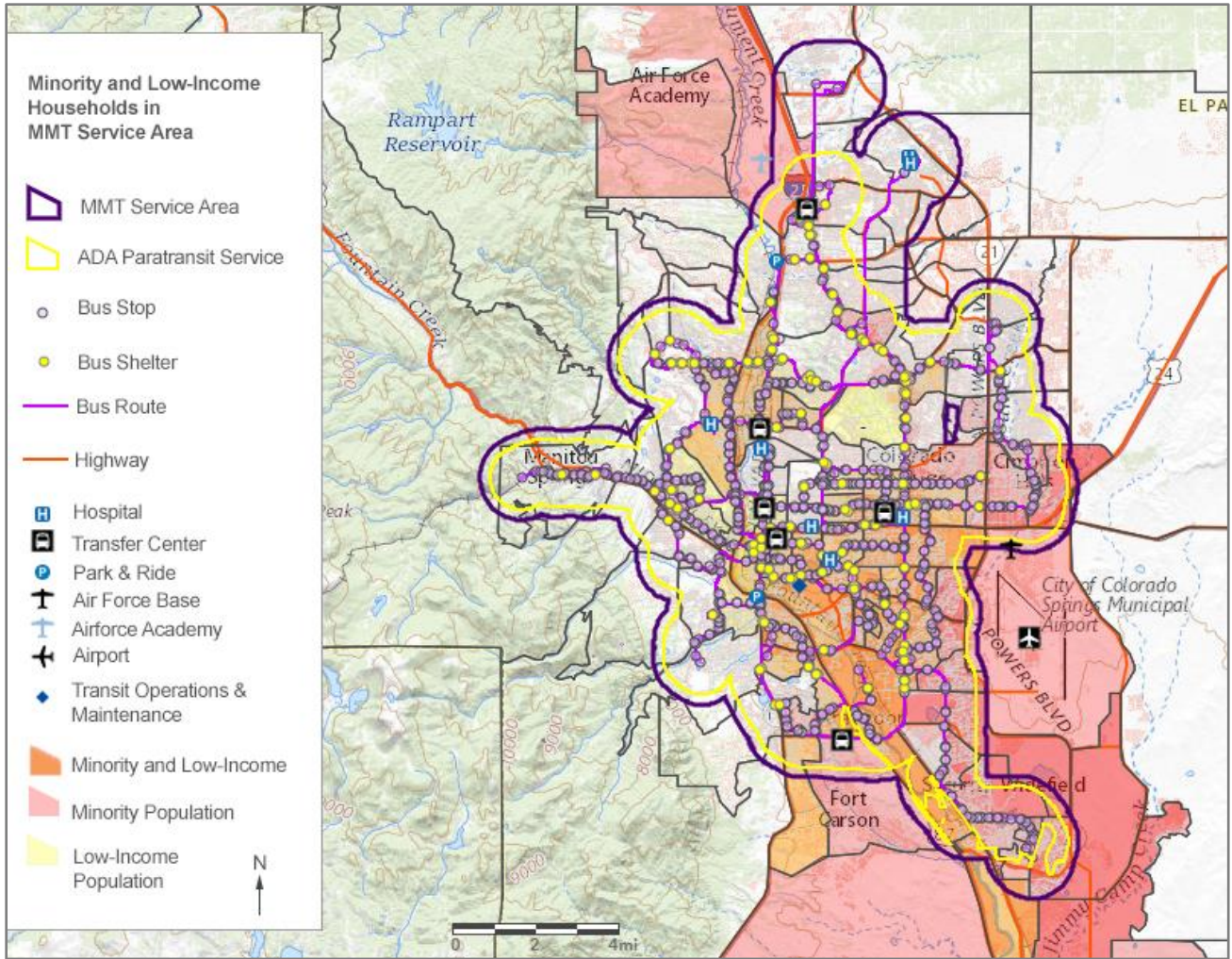


Figure 5 shows highlights the minority and low-income population in the MMT Service Area. The population is concentrated primarily south and west in the service area with smaller concentrations just southwest of the intersection of N. Academy Boulevard and American Drive along Bus Route 25 and along Route 14 from W. Uintah Street heading north.

## CUSTOMER DEMOGRAPHICS AND TRAVEL PATTERNS

MMT conducts a system-wide on-board survey every few years to identify customer demographics, travel patterns, and satisfaction with service. There were nearly 1,200 completed responses to the 2020 On-Board Survey, which consisted of 33 questions.

### Comparing MMT Riders to General Population

Comparing rider demographics to the demographics of all members of the general public as obtained through the ACS reveals some differences between the two groups (Table 3). Survey results indicate that MMT ridership is disproportionately low-income as compared to the service area population at large.

Table 3. Comparing Riders to General Population

Title VI Target Population	2020 On-Board Survey	MMT Service Area, 2014-2018 ACS
Minority Population	28.4%	33.6%
<i>Hispanic/Latino Origin</i>	21.5%	15.6%
Non-Minority Population	71.6%	66.4%
Low-Income Population	60.0%*	15.7%**
Non-Low-Income Population	40.0%	84.3%

\*Low-income defined as household income less than \$24,000

\*\*Low-income defined using 2018 U.S. Census Bureau Poverty Thresholds

### Household Income

In its 2020 On-Board Survey, MMT asked respondents about their annual household income which is summarized in Table 4. The majority of respondents (60 percent) had household incomes less than \$24,000. Minority respondents were more likely than non-minority respondents to have household incomes less than \$24,000.

Table 4. Household Income

Household Income	Total Population	Minority	Non-Minority
Less than \$24,000	59.98%	66.90%	61.10%
\$24,000 and \$31,999	12.76%	9.80%	9.10%
\$32,000 and \$39,999	11.53%	12.10%	14.10%
\$40,000 and \$47,999	3.37%	2.30%	3.50%
\$48,000 and \$55,999	3.47%	4.50%	3.90%
\$56,000 and \$63,999	1.86%	1.10%	2.10%
\$64,000 and \$71,999	1.95%	1.20%	1.50%
\$72,000 or more	5.08%	2.10%	4.70%

### English Proficiency and Language Spoken at Home

Questions related to English proficiency and language spoken at home were not collected through the 2020 On-Board Survey. Rather, the survey asked respondents to simply note their primary language. The clear majority of respondents, over 95 percent, indicated English was their primary language; less than 2 percent listed Spanish as their primary language (Table 5).

Table 5. Primary Language

Primary Language	Total Population	Minority	Non-Minority	Low-Income*	Non-Low-Income
English	95.72%	90.60%	98.70%	95.60%	94.30%
Spanish	1.63%	5.90%	0.50%	2.60%	2.90%
Other	2.65%	3.50%	1.00%	1.80%	2.80%

\*Low-income defined as household income less than \$24,000

## Fare Usage

The 2020 On-Board Survey also collected information regarding fare payment type, asking the question, “When you got on this bus, how did you pay?” This information can be used to conduct fare change equity evaluations. The results for minority and non-minority respondents and low-income and non-low-income respondents are summarized in Table 6 and Table 7, respectively.

Among minority and non-minority respondents, the use of cash for fare payment was most prominent. Minority respondents were less likely than non-minority respondents to use 1- or 20-ride, day or 31-day passes, or the Manitou Shuttle (Table 6).

Table 6. Fare Payment Type: Minority and Non-Minority

Fare Type	Minority	Non-Minority	Total	Percent Minority
Cash	321	440	761	42.18%
Day Pass	26	42	68	38.24%
20-Ride Pass	22	53	75	29.33%
31-Day Pass	23	84	107	21.50%
Manitou Shuttle	13	37	50	26.00%
Other	40	86	126	31.75%
Special Fare	75	181	256	29.30%
System Total	520	923	1,443	36.04%

Among low-income and non-low-income respondents, the use of cash for fare payment was used at about equal rates. Low-income respondents use the Special Fare and pass payments more frequently than non-low-income respondents (Table 7).

Table 7. Fare Payment Type: Low-Income and Non-Low-Income

Fare Type	Low-Income*	Non-Low-Income	Total	Percent Low-Income
Cash	42	44	86	48.84%
Day Pass	13	8	21	61.90%
20-Ride Pass	16	8	24	66.67%
31-Day Pass	16	6	22	72.73%
Manitou Shuttle	3	6	9	33.33%
Other	3	10	13	23.08%
Special Fare	47	15	62	75.81%
System Total	140	97	237	59.07%

\*Low-income defined as household income less than \$24,000

## Access to Transit Information

The 2020 On-Board Survey included the question, “How do you get information about MMT service? Check all that apply.” Responses to this question are summarized in Table 8. Minority and low-income respondents accessed information via web-based platforms—including social media, the MMT website, and other Internet sources— at lower rates than non-minority and non-low-income respondents. Low-income respondents tended to rely much more on other web-based sources such as Google Maps.

Table 8. Means of Accessing Transit Information

Fare Type	Total Population	Minority	Non-Minority	Low-Income*	Non-Low-Income
Bus drivers or MMT staff	23.4%	5.9%	17.5%	2.6%	20.8%
Printed maps, schedules, or bus stop	22.0%	5.5%	16.5%	3.2%	18.8%
Radio, TV, or newspapers/magazines	1.6%	0.5%	1.1%	0.1%	1.5%
Social media (Facebook, Twitter)	6.1%	1.3%	4.8%	1.1%	5.0%
MMT website (downloadable schedules, trip planner)	19.6%	4.5%	15.1%	2.8%	16.8%
Other web or phone/tablet app sources (Google Maps, Transit App)	23.0%	5.1%	17.9%	11.1%	11.9%
Other	4.3%	0.9%	3.3%	2.6%	1.7%

\*Low-income defined as household income less than \$24,000

## Mode Used to Access Transit at Beginning and End of Trip

Table 9 displays the proportion of riders by their mode of travel before and after the transit portion of their trip. The clear majority of people walk to their first transit stop, with over 88 percent arriving by foot. Less riders walk from the bus stop to their final destination (74 percent). Over 18 percent of riders transfer to another transit vehicle.

Table 9. Mode Used Before and After Transit Trip

Mode	Before	After
Walk	88.4%	74.1%
Bike	3.0%	2.3%
Shared Ride Service	0.5%	1.0%
Drive Myself	2.2%	1.0%
Dropped Off/Picked Up	4.0%	2.5%
Transferred	1.3%	18.5%
Other	0.6%	0.7%

## Vehicle Access

The 2020 On-Board Survey also asked the respondent whether they had access to a working vehicle to make their trip. Nearly 84 percent of total respondents did not have access to a working vehicle (Table 10). Low-income respondents were much less likely to have access to a working vehicle than non-low-income respondents (13.6 percent compared to 25.3 percent).

Table 10. Access to a Working Vehicle

Fare Type	Total Population	Minority	Non-Minority	Low-Income*	Non-Low-Income
No Access	79.8%	76.6%	80.6%	86.4%	74.7%
Access	20.2%	23.4%	19.4%	13.6%	25.3%

\*Low-income defined as household income less than \$24,000

## FARE AND SERVICE CHANGES

The Title VI Circular requires that transit providers which are located in an urbanized area with a population of more than 200,000 and which operate 50 or more vehicles in peak service must evaluate the equity impacts of proposed service and fare changes on minority and low-income populations. The MMT service area exceeds the 200,000-population threshold and exceeds the threshold of 50 or more vehicles in peak service.

In order to accomplish this requirement, transit providers are required to develop a “major service change” policy to determine when an equity evaluation is required. They are also required to develop policies for determining when a proposed fare or major service change will result in a disparate impact to minority populations and/or a disproportionate burden to low-income populations. The Title VI Circular requires that a public engagement process be included as part of the setting of these policies.

### Fare and Service Change Policies

#### *MMT Fare Change Policy*

All fare changes require an equity analysis.

#### *MMT Major Service Change Policy*

A major service change shall be defined as any proposed change that meets one or more of the following criteria:

- A service change impacting 30 percent or more of the operational hours on an existing route.
- An implementation of a new route or elimination of an existing route.

### Disparate Impact and Disproportionate Burden Policies

A determination of **disparate impact** shall be made if:

- The adverse impacts of a fare or major service change borne by the minority population are more than 20 percent greater than impacts borne by the non-minority population.

A determination of **disproportionate burden** shall be made if:

- The adverse impacts of a fare or major service change borne by the low-income population are more than 20 percent greater than impacts borne by the non-low-income population.

### ***Summary of Public Outreach Efforts***

Following the Title VI public notification requirements outlined in this Title VI program (pages 14-17), MMT staff conducted extensive public outreach efforts before the Fare and Service Change policies were set. In June 2017, MMT staff facilitated four in-person outreach events promoted to the public. These events were promoted on the MMT website, on Facebook through targeted advertisements, and through other MMT social media outlets. Event information was also distributed to various MMT stakeholder groups, including Peak Vista Community Health Centers. In total, MMT engaged with approximately 70 members of the public to discuss the proposed Title VI policies, the potential impact those policies would have on system evaluations, and any other areas of concern.

## **SERVICE AND FARE CHANGE EQUITY ANALYSIS METHODOLOGY**

The Title VI Circular requires that the equity impacts of all proposed fare and major service changes be evaluated before implementation during their planning stages. MMT’s proposed procedures for evaluating the changes, assessing the impact on the target populations, and applying the disparate impact and disproportionate burden policies are summarized below.

### **Service Change Equity Analyses**

A geographic information system (GIS)-based approach is employed in the service change equity analyses to measure the distribution of benefits and adverse impacts between minority and non-minority populations and between low-income and non-low-income populations. The impact of each service change is measured by comparing the number of weekly trips available to a population group before and after the service change. Service improvements such as increased frequency and span of service will result in an increase in the number of trips available. Service reductions will result in a decrease in the number of trips available.

Each analysis consists of four steps:

1. Model current and proposed service levels.
2. Spatially allocate current and proposed transit service levels to population groups based on intersection between service buffer and census block centroid.
3. Calculate the percent change in service between the current and proposed service levels for each census block.
4. Calculate the average percent change in service for all minority/low-income and non-minority/non-low-income populations within the service area buffer for the current and proposed transit service.

### **Four-Fifths Threshold**

The FTA defines “disparate impacts” as neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and

the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is performed. MMT uses qualitative assessments and the “four-fifths rule” to determine whether disparate impacts exist.

The four-fifths rule originates from employment law, but is applied in this setting to compare rates of benefits or adverse impacts among various population groups to identify whether they are distributed equitably. The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths or 80 percent of the rate for the group with the highest selection rate will be regarded as evidence of adverse impact. Although it is a “rule of thumb” and not a legal definition, it is a practical way for identifying adverse impacts that require mitigation or avoidance.

In service change equity analyses, if the quantitative results indicate that the service changes provide benefits to minority/low-income groups at a rate less than 80 percent of the benefits provided to non-minority/non-low-income groups, there could be evidence of disparate impacts. If disparate impacts are found based on this threshold, mitigation measures should be identified. For example, if the evaluation finds that the average non-minority person will see a 10 percent increase in service, the average minority person must see at least an 8 percent increase in service to meet the four-fifths threshold.

Alternatively, in a service reduction scenario, if the results indicate that the average minority person sees a 20 percent reduction in service, the average non-minority person must see at least a 16 percent reduction in service to meet the four-fifths threshold.

### Fare Change Equity Analyses

Fare change evaluations use a survey-based approach to measure the relative impact of proposed fare changes on minority, non-minority, low-income, and non-low-income populations. Passenger surveys are used to identify the race/ethnicity, household size, and household income for each passenger. This information is then tied to the fare payment type used by the passenger. This survey information, in conjunction with the proposed percent change for each fare payment type, can be used to calculate the average percent change in fare for minority, non-minority, low-income, and non-low-income riders.

### Summary of Recent Equity Evaluation Results

MMT has completed ten service change and two fare change equity evaluations since the submittal of the previous Title VI Program. The service and fare changes are summarized as follows and included as [Appendix D](#):

Type	Date	Description	Public Process	Disparate Impact	Disproportionate Burden
Service Frequency	4/29/2018	Route 1 – increased Saturday frequency to 30 minutes	Yes	No	No



Type	Date	Description	Public Process	Disparate Impact	Disproportionate Burden
Service Frequency	4/29/2018	Route 3 – increased Saturday frequency to 30 minutes	Yes	No	No
Service Addition	4/29/2018	Route 10 added to Sunday service	Yes	No	No
Service Addition	4/29/2018	Route 19 added to Sunday service	Yes	No	No
Service Addition	4/29/2018	Route 32 added to Saturday service	Yes	No	No
Route Change	4/29/2018	Route 4 adjusted to Cascade and Cimarron (its route prior to the I-25/Cimarron Interchange construction)	Yes	No	No
Service Addition	8/27/2018	Added new Route 40 to serve PPCC Rampart Campus (Express service)	Yes	No	No
Service Frequency	9/30/2018	Route 1 – increased weekday frequency to 15 minutes	Yes	No	No
Service Frequency	9/30/2018	Route 27 – increased weekday frequency to 15 minutes	Yes	No	No
Service Addition	9/30/2018	Added new Route 18 to serve Union Blvd	Yes	No	No
Fare Change	9/30/2018	Instituted half-fare for Metro Mobility (eliminated free fare)	Yes	No	No
Fare Change	9/30/2018	Introduced a new Special 31-Day Pass	Yes	No	No

## SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

MMT has established a set of service standards and policies to guide the provision of transit service in the region. Each standard or policy is explained in detail below. In accordance with the Title VI Circular, service standards and policies have been developed for the following measures:

- Vehicle Load;
- Vehicle Headway;

- On-Time Performance;
- Service Availability;
- Distribution of Amenities;
- Vehicle Assignment.

**Vehicle Load**

MMT’s service standard for vehicle load is to keep average vehicle loads at or below 100 percent of seating capacity during off-peak hours and at or below 120 percent of seating capacity during peak hours. These capacity standards are summarized below in Table 11. Additionally, no individual trip should ever exceed a “crush load” of 150 percent of seating capacity.

Table 11. Seating Capacity Policies by Bus Size and Time of Day

Bus Size	Seats Available	Off-Peak Capacity (100%)	Peak Capacity (120%)	Crush Load Capacity (150%)
40'	40	40	48	60
35'	31	31	37	47
30'	26	26	31	39

**Vehicle Headway**

MMT’s service standards for vehicle headway are based on mean system-wide ridership by time of day. MMT periodically calculates the mean passenger boardings per clock hour for weekdays, weekday evenings, Saturdays, and Sundays. MMT recommends the consideration of various headways when ridership rates are above or below the mean, or are above the mean plus one standard deviation as outlined in Table 12.

Table 12. Recommended Headways for Consideration (Minutes Between Buses)

Time of Day	Ridership Rate Below Mean	Ridership Rate Above Mean	Ridership Rate Above Mean + One Standard Deviation
Weekday	60	30	15
Weekday Evening	60	60	30
Saturday	60	60	30
Sunday	60	60	30

**On-Time Performance**

MMT measures the on-time performance of its buses at set time points along each route. MMT defines a bus arrival as on-time if it arrives at a time point no more than one minute earlier or five minutes later than the scheduled arrival time. MMT’s service standard is for 85 percent of bus time point arrivals to be on-time.

## Service Availability

MMT evaluates service availability through system coverage and stop spacing.

### *System Coverage*

Service availability is commonly measured in terms of the percent of the service area or population that is within a specified distance (commonly one-quarter mile for bus service) of the transit system. MMT's long-term goal is to provide fixed-route transit service to 90 percent of the Colorado Springs UZA population. The population living in census blocks with their centroid located within one-quarter mile of fixed-route service is considered served.

### *Stop Spacing*

An alternative method of assessing service availability is by reviewing bus stop spacing. MMT's bus stop spacing guidelines are based on the housing and employment density of the surrounding area. Specifically, a threshold of 4 households per acre or 5 jobs per acre is used to determine whether an area is a "transit supportive area" (TSA). Using a combination of Longitudinal Employer-Household Data and other U.S. Census Bureau data, a value for jobs per acre and housing units per acre is calculated for each census block in the MMT service area. If a census block meets or exceeds either threshold, it is identified as a TSA. Each bus stop is identified as being in a TSA or non-TSA by calculating the household and job density within a 1,000-foot buffer of the stop. The bus stop spacing standards for TSA and non-TSA areas are summarized in Table 13.

Table 13. Bus Stop Spacing Guidelines

Location Category	Stop Spacing Standard (ft.)
Transit Supportive Area: 4+ Households/Acre or 5+ Jobs/Acre	1,320 ft. ±50% (-mile to -mile)
Non-Transit Supportive Area	2640 ft. ±650% (-mile to -mile)

## Distribution of Amenities

MMT's service policy is for transit amenities to be distributed equitably throughout the system. MMT has defined standards for the distribution of shelters and benches at bus stops.

### *Bus Stop Shelters*

A bus stop shall be considered for a shelter if it (1) serves a single route with at least 25 daily boardings; (2) serves multiple routes; or (3) is located in a high traffic area with advertising potential. The actual conditions at a bus stop location will dictate whether amenities can be provided in a safe and effective manner.

### ***Bus Stop Benches***

MMT endeavors to provide a bus bench at each stop location. However, the actual conditions at a bus stop location will dictate whether amenities can be provided in a safe and effective manner.

### **Vehicle Assignment**

MMT assigns vehicles to routes based on current estimated ridership loads. MMT’s policy is to rotate similarly sized vehicles between routes to ensure an equitable distribution of both new and old buses. Buses are to be rotated within their respective size categories to equalize the wear and tear on each bus, and to equitably distribute buses of various age throughout the system.

## **SERVICE MONITORING**

The most recent Service Monitoring Evaluation was completed in June 2020. Each of the service standards and policies described in the preceding section were evaluated to ensure an equitable distribution of service between minority and non-minority populations and between low-income and non-low-income populations. The full Service Monitoring Evaluation report is available on the MMT website. The evaluation result for each standard or policy is summarized in Table 14.

The 2020 evaluation found no disparate impact or disproportionate burden. The 2017 Service Monitoring Evaluation noted a potential disproportionate burden for bus shelter distribution. Between 2017 and 2019, MMT added bus shelters to mitigate this potential concern.

Table 14. Summary of Monitoring Results

<b>Standard or Policy</b>	<b>Minority Results</b>	<b>Low-Income Results</b>
Vehicle Load	No Disparate Impacts	No Disproportionate Burdens
Vehicle Headway	No Disparate Impacts	No Disproportionate Burdens
On-Time Performance	No Disparate Impacts	No Disproportionate Burdens
<b>Service Availability</b>		
System Coverage	No Disparate Impacts	No Disproportionate Burdens
Stop Spacing	No Disparate Impacts	No Disproportionate Burdens
<b>Transit Amenities</b>		
Shelters	No Disparate Impacts	No Disproportionate Burdens
Benches	No Disparate Impacts	No Disproportionate Burdens
Vehicle Assignment	No Disparate Impacts	No Disproportionate Burdens

# APPENDICES

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## APPENDIX A: TITLE VI NOTICE - ENGLISH



### MMT Notice of Public Rights under Title VI

Mountain Metropolitan Transit is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in the receipt of its services on the basis of race, color, or national origin. If you believe you have been subjected to discrimination on the basis of race, color, or national origin, you may file a written complaint no later than 180 calendar days after the date of the alleged discrimination with the MMT Title VI Coordinator by calling 719-385-RIDE (7433), emailing [transitinfo@coloradosprings.gov](mailto:transitinfo@coloradosprings.gov), or contacting us at the following address:

Mountain Metropolitan Transit Title VI Coordinator  
1015 Transit Drive  
Colorado Springs, CO 80903

Additional information regarding protections under Title VI and detailed instructions for submitting a formal Title VI complaint are available on the MMT website at: [www.coloradosprings.gov/communications/page/title-vititulo-vi](http://www.coloradosprings.gov/communications/page/title-vititulo-vi). A complaint may also be filed directly with the Federal Transit Administration by submitting it to:

Office of Civil Rights, Attention: Title VI Program Coordinator East  
Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Ave., SE  
Washington DC 20590

## TITLE VI NOTICE - SPANISH



### Notificación de Derechos Públicos de MMT bajo el Título VI

Mountain Metropolitan Transit se compromete a garantizar que ninguna persona sea excluida de la participación, que se nieguen los beneficios de, o esté sujeta a discriminación en la recepción de sus servicios por motivos de raza, color u origen nacional. Si cree que ha sido objeto de discriminación por motivos de raza, color u origen nacional, puede presentar una queja por escrito a más tardar 180 días calendario después de la fecha de la supuesta discriminación con el Coordinador del Título VI de MMT llamando al 719-385-RIDE (7433), enviando un correo electrónico [transitinfo@coloradosprings.gov](mailto:transitinfo@coloradosprings.gov) o poniéndose en contacto con nosotros en la siguiente dirección:

Mountain Metropolitan Transit Title VI Coordinator  
1015 Transit Drive  
Colorado Springs, CO 80903

Información adicional sobre las protecciones bajo el Título VI y las instrucciones detalladas para presentar una queja formal del Título VI están disponibles en el sitio web de MMT en: [www.coloradosprings.gov/communications/page/title-vititulo-vi](http://www.coloradosprings.gov/communications/page/title-vititulo-vi). Una queja también se puede presentar directamente ante la Administración Federal de Tránsito presentándola a:

Office of Civil Rights, Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Ave., SE, Washington DC 20590



## APPENDIX B: TITLE VI COMPLAINT FORM AND PROCEDURES – ENGLISH

### Mountain Metropolitan Transit Title VI Civil Rights Complaint Form



Instructions: To submit a Title VI complaint to Mountain Metropolitan Transit, please print and complete the following form, sign and return to: Mountain Metropolitan Transit, Attention: Title VI Coordinator, 1015 Transit Drive, Colorado Springs, CO 80903. For questions or a full copy of Mountain Metropolitan Transit's Title VI policy and complaint procedures, please submit a written request to the above address, visit [www.mmtransit.com](http://www.mmtransit.com), call (719) 385-7433, or Email [transitinfo@springsgov.com](mailto:transitinfo@springsgov.com).

<b>Section I:</b>	
1. Name (Complainant):	
2. Home Address (Street No., City, State, Zip)	
3. Phone:	4. Email Address:
5. Accessible format requirements? (please check preference)	
<input type="checkbox"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TDD <input type="checkbox"/> Other (please indicate) _____	
<b>Section II:</b>	
6. Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes <input type="checkbox"/> No (If you answered "yes" to this question, please go to <b>Section III</b> .)	
7. If you answered "no" to question 6, please describe your relationship to the person (Complainant) for whom you are filing and why you are filing for a third party:	
8. Have you obtained permission of the aggrieved party (Complainant) to file this complaint on his or her behalf? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Section III:</b>	
9. Have you previously filed a Title VI complaint with Mountain Metropolitan Transit? <input type="checkbox"/> Yes <input type="checkbox"/> No	
10. Have you filed this complaint with any other federal, state, or local agencies or with any federal or state court? <input type="checkbox"/> Yes <input type="checkbox"/> No	
11. If "yes," please 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	
12. If filed at an agency and/or court, please provide information for your point of contact at the agency/court where the complaint was filed:	
<u>Agency/Court:</u>	<u>Contact Name:</u>
<u>Address:</u>	<u>Phone Number:</u>

**Section IV:**

13. Date of Incident:	14. If applicable, name of person(s) who allegedly discriminated against you:
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15. Discrimination based on (please check all that apply):    Race    Color    National Origin

16. Please provide a brief explanation of the incident and how you feel you were discriminated against, including how you feel others may have been treated differently than you. If you require additional space or have additional written material pertaining to your complaint, please attach to this form.

17. Why do you believe this event occurred?

18. How can this issue be resolved to your satisfaction?

19. Please list any person(s) we may contact for additional information to support or clarify your complaint:  
Name: Address: Phone Number:

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**Section V:**

Signature:	Date of filing:
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**Please note: Mountain Metropolitan Transit cannot accept your complaint without a signature.**

Please mail your completed form to:

Mountain Metropolitan Transit  
Attention: Title VI Coordinator  
1015 Transit Drive  
Colorado Springs, CO 80903

## MMT Title VI Complaint Procedures

The following procedures cover complaints filed under Title VI of the Civil Rights Act of 1964 for alleged discrimination in any program or activity administered by Mountain Metropolitan Transit. These procedures do not affect 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 Mountain Metropolitan Transit 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 written complaint using the Mountain Metropolitan Transit Title VI Complaint Form and send it to the following address:

Title VI Coordinator  
Mountain Metropolitan Transit  
1015 Transit Drive  
Colorado Springs, CO 80903  
Phone: (719) 385-7433

Complaints may also be filed with the Federal Transit Administration's Office of Civil Rights no later than one-hundred eighty (180) calendar days after the date of the alleged discrimination at the following address:

Office of Civil Rights  
ATTN: Title VI Program Coordinator  
East Building, 5th Floor – TCR  
1200 New Jersey Ave, SE  
Washington, D.C. 20590  
Phone: 202-366-4648

### The following measures will be taken to resolve Title VI complaints:

- 1) A formal complaint must be filed within one-hundred eighty (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 the alleged discriminating person(s), basis of complaint (race, color, national origin), and the date of the alleged act or acts. A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

A [Mountain Metropolitan Transit Title VI Complaint Form](#) can be found on this website or may be requested by calling (719) 385-7433 or writing Mountain Metropolitan Transit's Title VI Coordinator at the address listed above.

- 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 Mountain Metropolitan Transit's Title VI Coordinator. Under these circumstances, the Complainant will be interviewed, and the 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 sixty (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 fifteen (15) calendar days from receipt of a complete complaint, Mountain Metropolitan Transit 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 Transit Services Division Manager or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
  - If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - If the complaint is to be investigated, the notification shall state the grounds of Mountain Metropolitan Transit's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting in the investigation.
- 6) When Mountain Metropolitan Transit does not have sufficient jurisdiction, the Transit Services Division Manager 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 Services Division Manager or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Transit Services Division Manager within sixty (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 investigator will notify the appropriate authorities, and an extension will be requested.
- 8) The Transit Services Division Manager or his/her authorized designee will issue letters of finding to the Complainant and Respondent within ninety (90) calendar days from receipt of the complaint.
- 9) If the Complainant is dissatisfied with Mountain Metropolitan Transit's resolution of the complaint, he/she has the right to file a complaint with the Departmental Office of Civil Rights, U.S. Department of Transportation, 1200 New Jersey Ave., S.E. Washington D.C. 20590, Phone: 202-366-4648.

## TITLE VI COMPLAINT FORM AND PROCEDURES – SPANISH

### Mountain Metropolitan Transit Derechos Civiles Título VI Formulario de Queja



Instrucciones: Para presentar una queja del Título VI de la Mountain Metropolitan Transit, por favor imprima y complete el siguiente formulario, firmar y devolver a: Mountain Metropolitan Transit, Atención: Coordinador del Título VI, 1015 Tránsito Drive, Colorado Springs, CO 80903. Para preguntas o un copia completa de procedimientos de la política y de queja del Título VI de la Mountain Metropolitan Transit, por favor envíe una solicitud por escrito a la dirección antes mencionada, visite [www.mmtransit.com](http://www.mmtransit.com), llame (719) 385-7433, o por correo electrónico [transitinfo@coloradosprings.gov](mailto:transitinfo@coloradosprings.gov).

#### Sección I:

1. Nombre (demandante):
2. Domicilio (Calle No., ciudad, estado, código postal)
3. Teléfono:
4. Dirección De Correo Electrónico:
5. Requisitos de formato accesible? (por favor marque preferencia)
  - Letra Grande
  - Cinta de Audio
  - TDD
  - Otro (por favor indicar)

#### Sección II:

6. ¿Está presentando esta queja en su propio nombre?  Sí  No  
(Si su respuesta es "sí" a esta pregunta, por favor vaya a la Sección III.)
7. Si su respuesta es "no" a la pregunta 6, describa su relación con la persona (el demandante) para la que está solicitando y por qué usted está solicitando para un tercero:
8. ¿Ha obtenido el permiso de la parte agraviada (el demandante) para presentar esta queja en su nombre?  
 Sí  No

#### Sección III:

9. ¿Ha presentado previamente una queja del Título VI con la montaña de Tránsito Metropolitano?  
 Sí  No
10. ¿Ha presentado esta queja con cualquier otro, estatales, locales u organismos federales o con cualquier corte federal o estatal?  Sí  No
11. Si "sí", por favor marque todas las que apliquen:
  - Agencia Federal
  - Agencia Local
  - Agencia Estatal
  - Corte Federal Tribunal Estatal

12. Si se presenta en una agencia y / o de la corte, por favor proporcionar información de su punto de contacto en la agencia / tribunal donde se presentó la queja:

Agencia / Corte:

Nombre de Contacto:

dirección:

Número De Teléfono:

**Sección IV:**

13. Fecha del incidente:

14. En su caso, nombre de la persona (s) que supuestamente discriminaron contra ti:

15. Discriminación basada en (marque todas las que correspondan):

Raza

Color

Origen Nacional

16. Sírvase proporcionar una breve explicación del incidente y cómo se siente que fue discriminado, incluyendo cómo se siente que otros pueden haber sido tratados de manera diferente que tú. Si necesita espacio adicional o tiene material escrito adicional relativa a su queja, favor de adjuntar a este formulario.

17. ¿Por qué cree usted que ocurrió este evento?

18. ¿Cómo puede este problema se resuelva a su satisfacción?

19. Por favor escriba cualquier persona (s) / podemos ponernos en contacto para obtener información adicional para apoyar o clarificar su queja:

nombre:

dirección:

Número De Teléfono:

**Sección V:**

Firma:

Fecha de presentación:

**Tenga en cuenta: Mountain Metropolitan Transit no puede aceptar su queja sin una firma.**

Por favor envíe su formulario completo a:

Mountain Metropolitan Transit

Atención Coordinador del Título VI

105 Transit Drive

Colorado Springs, CO 80903

## MMT Título VI Procedimientos de Investigación

Los siguientes procedimientos cubren las quejas presentadas en virtud del Título VI de la Ley de Derechos Civiles de 1964 por presunta discriminación en cualquier programa o actividad administrada por la Mountain Metropolitan Transit. Estos procedimientos no afectan al derecho de la demandante a presentar denuncias formales con otras agencias estatales o federales o de buscar un abogado privado para denuncias de discriminación. Se hará todo lo posible por obtener pronta resolución de las quejas en el nivel más bajo posible. La opción de la reunión de mediación informal (s) entre las partes afectadas y la Mountain Metropolitan Transit se puede utilizar para su resolución. Cualquier persona, grupo de personas o entidad que crea que ha sido objeto de una discriminación prohibida por el Título VI y los estatutos pueden presentar una queja por escrito usando el Formulario de Queja de Mountain Metropolitan Transit Título VI y enviarlo a la siguiente dirección:

Coordinador del Título VI  
Montaña de Tránsito Metropolitano  
1015 Tránsito de unidad  
Colorado Springs, CO 80903  
Teléfono: (719) 385-7433

Las quejas también se pueden presentar ante la Oficina de Derechos Civiles de la Administración Federal de Tránsito a más tardar un ciento ochenta (180) días calendario después de la fecha de la supuesta discriminación en:

Office of Civil Rights, ATTN: Title VI Program Coordinator  
East Building, 5th Floor – TCR  
1200 New Jersey Ave, SE  
Washington, D.C. 20590  
Phone: 202-366-4648

### Se tomarán las siguientes medidas para resolver las quejas de Título VI:

- 1) Una queja formal debe ser presentada dentro de los ciento ochenta (180) días calendario a partir de la supuesta aparición. Las quejas deberán ser por escrito y firmado por la persona o su representante /, e incluirán el nombre, dirección del autor y número de teléfono; nombre de la persona que supuestamente discriminatorio (s), base de la queja (raza, color, origen nacional), y la fecha del presunto acto o actos. Una declaración detallando los hechos y circunstancias de la supuesta discriminación debe acompañar todas las reclamaciones.

Un Formulario de Queja Mountain Metropolitan Transit Título VI se puede encontrar en este sitio web o puede solicitar llamando (719) 385-7433 o escribiendo Coordinador del Título VI de la montaña de Tránsito Metropolitano en la dirección mencionada anteriormente.

- 2) En el caso de que el demandante no puede o incapaz de proporcionar una declaración por escrito, una queja verbal de la discriminación puede hacerse al Coordinador del Título VI de la Mountain Metropolitan Transit. En estas circunstancias, el demandante será entrevistado, y el Coordinador del Título VI asistirá al demandante en la conversión de los alegatos verbales a la escritura.
- 3) Cuando se recibe una queja, el Coordinador del Título VI proporcionará reconocimiento por escrito al demandante dentro de los días de los diez (10) días calendario por correo certificado.



- 4) Si la reclamación se considera incompleta, se solicitará información adicional, y el demandante se proveerá de los sesenta (60) días calendario para presentar la información requerida. De no hacerlo, se puede considerar una buena causa para la determinación de ningún mérito investigativo.
- 5) En el plazo de quince días (15) días naturales desde la recepción de una denuncia completa, Mountain Metropolitan Transit determinará su competencia en la búsqueda de la materia y si la queja tiene méritos suficientes para justificar una investigación. Dentro de los cinco (5) días calendario a partir de esta decisión, la División de Servicios de Tránsito del Pesebre o su designado / a autorizado notificará al demandante y al demandado, por correo certificado, para informarles de la disposición.
  - Si la decisión es de no investigar la denuncia, la notificación se hará constar expresamente el motivo de la decisión.
  - Si la queja se va a investigar, la notificación deberá explicar los motivos de la jurisdicción de la montaña de Tránsito Metropolitano, mientras que informar a las partes que se aplicarán a su plena cooperación en la recopilación de información adicional y ayudar en la investigación.
- 6) Cuando Mountain Metropolitan Transit no tiene competencia suficiente, el Gerente de la División de Servicios de Tránsito o su designado / a autorizado remitirá la queja a la agencia Estatal o Federal apropiada celebración de dicha jurisdicción.
- 7) Si la queja tiene mérito investigativo, el Gerente de la División de Servicios de Tránsito o su designado / a autorizado asignará un investigador. Se llevará a cabo una investigación completa, y un informe de investigación se presentará al Gerente de la División de Servicios de Tránsito dentro de los sesenta (60) días naturales desde la recepción de la queja. El informe incluirá una descripción narrativa de los hechos, los resúmenes de todas las personas entrevistadas, y un hallazgo con recomendaciones y medidas de conciliación en su caso. Si la investigación se retrasa por cualquier razón, el investigador notificará a las autoridades correspondientes, y se solicitó una prórroga.
- 8) El Transit Services Gerente de División o su designado / a autorizado emitirán cartas de investigación al demandante y al demandado dentro de los noventa días (90) días naturales desde la recepción de la queja.
- 9) Si el demandante no está satisfecho con la resolución de la Mountain Metropolitan Transit de la queja, él / ella tiene el derecho de presentar una queja ante la Oficina Departamental de Derechos Civiles del Departamento de Transporte de Estados Unidos, 1200 New Jersey Ave., SE Washington DC 20590, teléfono: 202-366-4648.

## APPENDIX C: SUBRECIPIENT AGREEMENT AND THIRD-PARTY CONTRACT CLAUSES

Mountain Metropolitan Transit maintains that subrecipients comply with Title VI Civil Rights requirements per FTA Circular C 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients") Page III-10 Section 11 and Appendix L:

*If an organization receives funds from another FTA recipient, that is, funds are "passed through" to the organization from an entity that received those funds from FTA; then the subrecipient must submit a Title VI Program to the City of Colorado Springs. (Agency Name) must submit the following on or before January 10, 2015:*

- Title VI Program
- Title VI Complaint Process
- Title VI Complaints received in the last three years

Mountain Metropolitan Transit incorporates the following Federal clauses in all subrecipient agreements and third-party contracts:

### 1. CIVIL RIGHTS REQUIREMENTS:

29 U.S.C. § 623, 42 U.S.C. § 2000

42 U.S.C. § 6102, 42 U.S.C. § 12112

42 U.S.C. § 12132, 49 U.S.C. § 5332

29 CFR Part 1630, 41 CFR Parts 60 et seq.

- Nondiscrimination - In accordance with Title VI of the Civil Rights Act, as amended, 42 U.S.C. § 2000d, section 303 of the Age Discrimination Act of 1975, as amended, 42 U.S.C. § 6102, section 202 of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12132, and Federal transit law at 49 U.S.C. § 5332, the Contractor agrees that it will not discriminate against any employee or applicant for employment because of race, color, creed, national origin, sex, age, or disability. In addition, the Contractor agrees to comply with applicable Federal implementing regulations and other implementing requirements FTA may issue.
- Equal Employment Opportunity - The following equal employment opportunity requirements apply to the underlying contract:
- Race, Color, Creed, National Origin, Sex - In accordance with Title VII of the Civil Rights Act, as amended, 42 U.S.C. § 2000e, and Federal transit laws at 49 U.S.C. § 5332, the Contractor agrees to comply with all applicable equal employment opportunity requirements of U.S. Department of Labor (U.S. DOL) regulations, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor," 41 C.F.R. Parts 60 et seq., (which implement Executive Order No. 11246, "Equal Employment Opportunity," as amended by Executive Order No. 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," 42 U.S.C. § 2000e note), and with any applicable Federal statutes, executive orders, regulations, and Federal policies that may in the future affect construction activities undertaken in the course of the Project. The Contractor agrees to take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, creed, national origin, sex, or age. Such action shall include, but not be limited to, the following: employment, upgrading, demotion or transfer, recruitment or

*recruitment advertising, layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. In addition, the Contractor agrees to comply with any implementing requirements FTA may issue.*

- d. Age - In accordance with section 4 of the Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 623 and Federal transit law at 49 U.S.C. § 5332, the Contractor agrees to refrain from discrimination against present and prospective employees for reason of age. In addition, the Contractor agrees to comply with any implementing requirements FTA may issue.*
- e. Disabilities - In accordance with section 102 of the Americans with Disabilities Act, as amended, 42 U.S.C. § 12112, the Contractor agrees that it will comply with the requirements of U.S. Equal Employment Opportunity Commission, "Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act," 29 C.F.R. Part 1630, pertaining to employment of persons with disabilities. In addition, the Contractor agrees to comply with any implementing requirements FTA may issue.*

#### EQUAL OPPORTUNITY

*The City of Colorado Springs is committed to equal employment opportunity for all and maintains and implements equal opportunity and affirmative action where necessary in all of its daily operations. City policy is that no person shall be discriminated against because of race, color, national origin or ancestry, sex, age, religious convictions, veteran status, disability or political beliefs. Contractor shall comply with all federal and state nondiscrimination laws and have an equal employment opportunity policy. Contractor shall also comply with City Equal Employment Opportunity/Affirmative Action policies regarding nondiscrimination and harassment, which includes sexual harassment, in the conduct of its business while on City property and/or interacting with City employees. Contractor will cooperate with City in using Contractor's best efforts to ensure that Disadvantaged Business Enterprises are afforded the full opportunity to compete for subcontracts or work under this Agreement.*

## **APPENDIX D: FACILITY SITING, FARE, AND SERVICE CHANGE ANALYSES**



**DATE:** August 7, 2018  
**TO:** Craig Blewitt, Transit Services Manager  
**FROM:** Erin McCauley, Transit Planning Data Analyst  
**SUBJECT TITLE:** Facility-Siting Equity Analysis – Bus Storage and Administration Buildings

### **SUMMARY**

As a recipient of Federal Transit Administration (FTA) resources, Mountain Metropolitan Transit (MMT) has a federally-approved Title VI Program and is required to conduct a Title VI and Environmental Justice equity analysis in the course of siting any new facility. Analysis of demographic data and land use data indicates the property at 1190 Transit Drive as the preferred location for the proposed bus storage and administration buildings. The demography of census blocks within 1,000 feet of 1190 Transit Drive indicates **no evidence of disparate impact or disproportionate burden** and further affects the least number of people compared to other sites.

### **PROJECT SCOPE**

MMT currently parks its fixed-route vehicles under an open canopy adjacent to the maintenance building at 1145 Transit Drive when they are not in use. Canopy parking is currently at capacity and the site cannot accommodate any further open-air bus parking due to space constraints and stormwater-mitigation requirements. MMT has expanded its fleet from 43 in 2014 to 58 in 2018 and plans to add more vehicles as funding allows.

MMT proposes to construct a new enclosed vehicle storage building to accommodate at least 72 40-ft. fixed-route buses. The building is anticipated to be at least 40,000 square feet in size and include infrastructure to support electric bus operations.

Phase II of the project will include construction of an administrative office building of approximately 8,000 square feet and a surface parking lot to accommodate approximately 120 parking spots for employees and contract employees. MMT plans to co-locate fixed-route service administration and vehicle storage for operational reasons.

### **POTENTIAL IMPACTS**

MMT currently runs fixed-route service between 5 a.m. and 11 p.m. on weekdays, between 6 a.m. and 10 p.m. on Saturdays, and between 6 a.m. and 9 p.m. on Sundays. Buses leave the current canopy property about a half-hour prior to the first assigned revenue trip (more or less, depending on where the bus starts its revenue service). Thus, most of the activity related to the storage garage will occur during the early-morning and late-night hours. Potential impacts of the storage garage include increased traffic, noise, and light. While many of these impacts can be mitigated through site design, choosing a location that is accessible via major roadways and is adequately separated from residences is advisable since most people are at home during the hours the bus storage building will see the most activity.

Phase II of the proposed project will include construction of an administrative building and parking lot. The administrative building will likely house fixed-route employees who will work during the daylight hours. The most likely impact of the administrative building will be increased traffic to the site and on surrounding roads.

### **PURPOSE OF THIS ANALYSIS**

As a recipient of Federal Transit Administration (FTA) resources, Mountain Metropolitan Transit has a federally-approved Title VI Program and is required to conduct a Title VI and Environmental Justice equity analysis in the course of determining proposed locations for any new facility. The FTA Title VI Circular 4702.1B states the following, with regard to facility siting:

*"In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin.... Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc."*

### **POTENTIAL SITES FOR CONSIDERATION**

For operational reasons, MMT plans to co-locate all fixed-route service administration and contract personnel with fixed-route vehicle storage. Therefore, any potential site must be large enough to accommodate the vehicle storage building, the administrative office building, and a large employee parking lot. Additional criteria for site evaluation include:

- Proximity to existing MMT facilities;
- Accessibility from major roads; and
- Land acquisition costs.

MMT has identified four (4) sites for evaluation with the space to accommodate the proposed structures and that are close to the existing MMT campus:

1. 1031 S El Paso Street – 4.78 acres;
2. 933 S El Paso Street – 4.82 acres;
3. 2049 E Fountain Boulevard – 8.54 acres; and
4. 1190 Transit Drive – 5.74 acres.

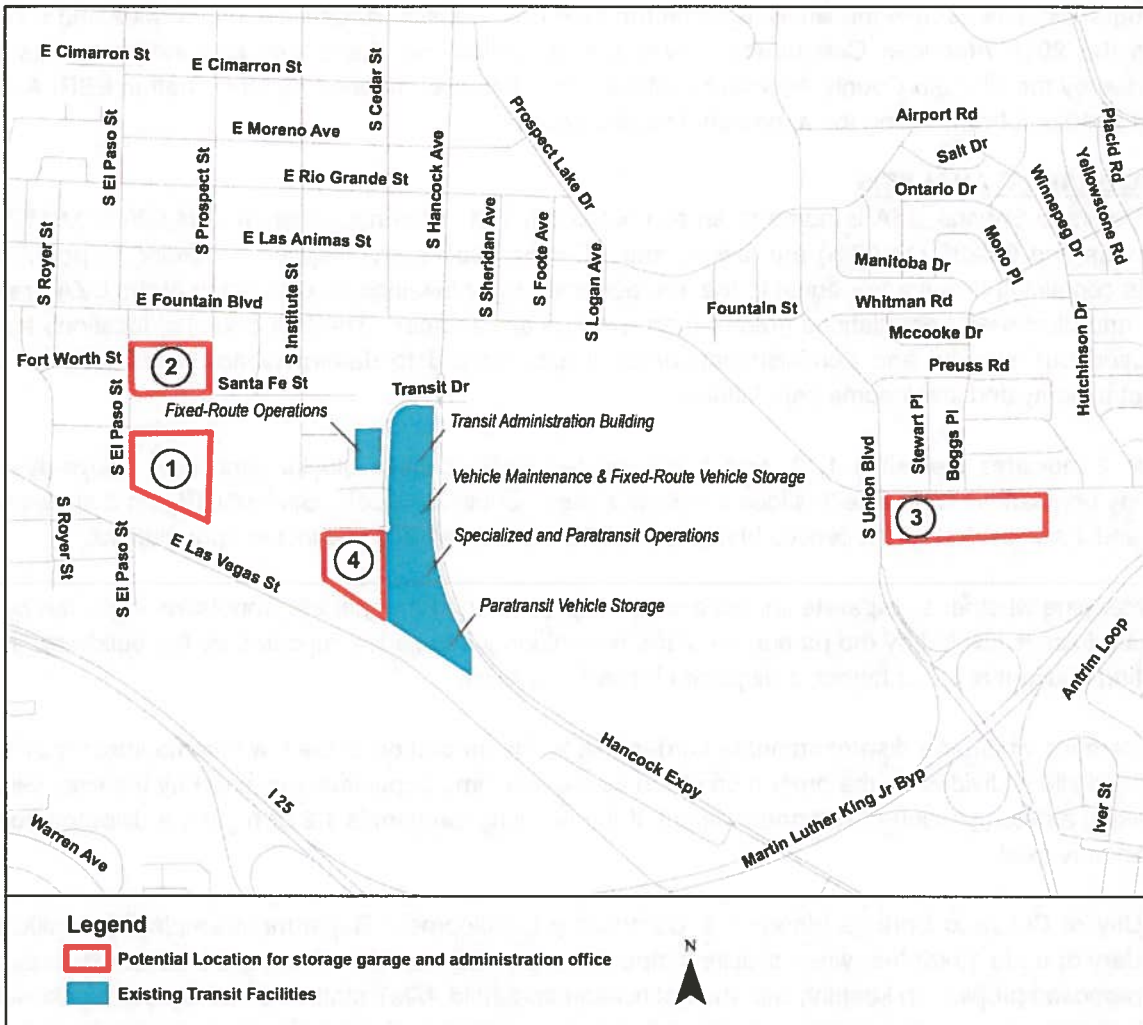
The first location, 1031 S El Paso Street, is the second-closest lot to the MMT campus but is not directly accessible from any major road. The property consists of several parcels but is largely owned by one private entity. The property is currently vacant except for a warehouse structure in the northwest corner.

The second location, 933 S El Paso Street, is slightly farther away from the MMT campus and is not directly accessible from any major road. The area that would need to be acquired consists of land from five separate property owners. Siting the newest MMT facility in this location would displace two residences and a religious institution.

The third location, 2049 E Fountain Boulevard, is the farthest location from the MMT campus and consists of three separate parcels owned by two different private entities. Most of the property is currently vacant, except for a large dilapidated restaurant building located in the eastern third. The site features direct access from Fountain Boulevard, which is a four-lane Principal Arterial.

The final location, 1190 Transit Drive, is located at the end of Transit Drive, directly across from the Metro Mobility paratransit administration building and paratransit vehicle storage garage. The property consists

of two parcels that are both owned by the City of Colorado Springs. Currently, the site is used to store road-construction and street-sweeping waste by the City of Colorado Springs Street Division. Although not a major road, all of the transit campus is located along Transit Drive along with only three private properties.



## **APPROACH**

In accordance with MMT's approved Title VI Program and to provide granularity to service analyses, the most recent American Community Survey (ACS) 5-Year Estimates was obtained from the U.S. Census Bureau at the block group level and distributed to individual blocks.

Tables B03002 (Hispanic or Latino Origin by Race) and C17002 (Ratio of Income to Poverty Level) from the 2016 ACS 5-Year Estimates were downloaded for all block groups in El Paso County and were distributed to individual blocks using population percentages from the 2010 Decennial Census. For example, if the 2010 data showed a block contained 10% of the population of its parent block group, it was assumed the block then contains 10% of the minority and low-income population estimated in the 2016 ACS data.

The distributed demographics were then joined to spatial boundaries at the census block level. Blocks with their centroids within the Colorado Springs Urbanized Area (UZA) were selected and exported for analysis.

Additional information regarding land use was obtained from the El Paso County Assessor and mapped at the parcel level, according to structure type. Parcels and census blocks within 1,000 feet of each potential site were selected and analyzed.

### **DATA**

Demographic data used in this analysis came from the U.S. Census Bureau, Tables B03002 and C17002 within the 2016 American Community Survey 5-Year Estimates. Land use and structure data was provided by the El Paso County Assessor's Office. The data was mapped by MMT staff in ESRI ArcGIS Desktop 10.2 software using the approach described above.

### **DEMOGRAPHIC ANALYSIS**

The Colorado Springs UZA is home to an estimated 597,271 residents, of whom 184,036 (30.81%) are minorities and 69,238 (15.27%) are low-income. Census blocks are mapped according to population; blocks containing less than or equal to the average minority or low-income population of the UZA are one color and blocks with populations greater than average are another. The four potential locations for the proposed bus storage and administration building are overlaid to determine how each location may impact minority and low-income populations.

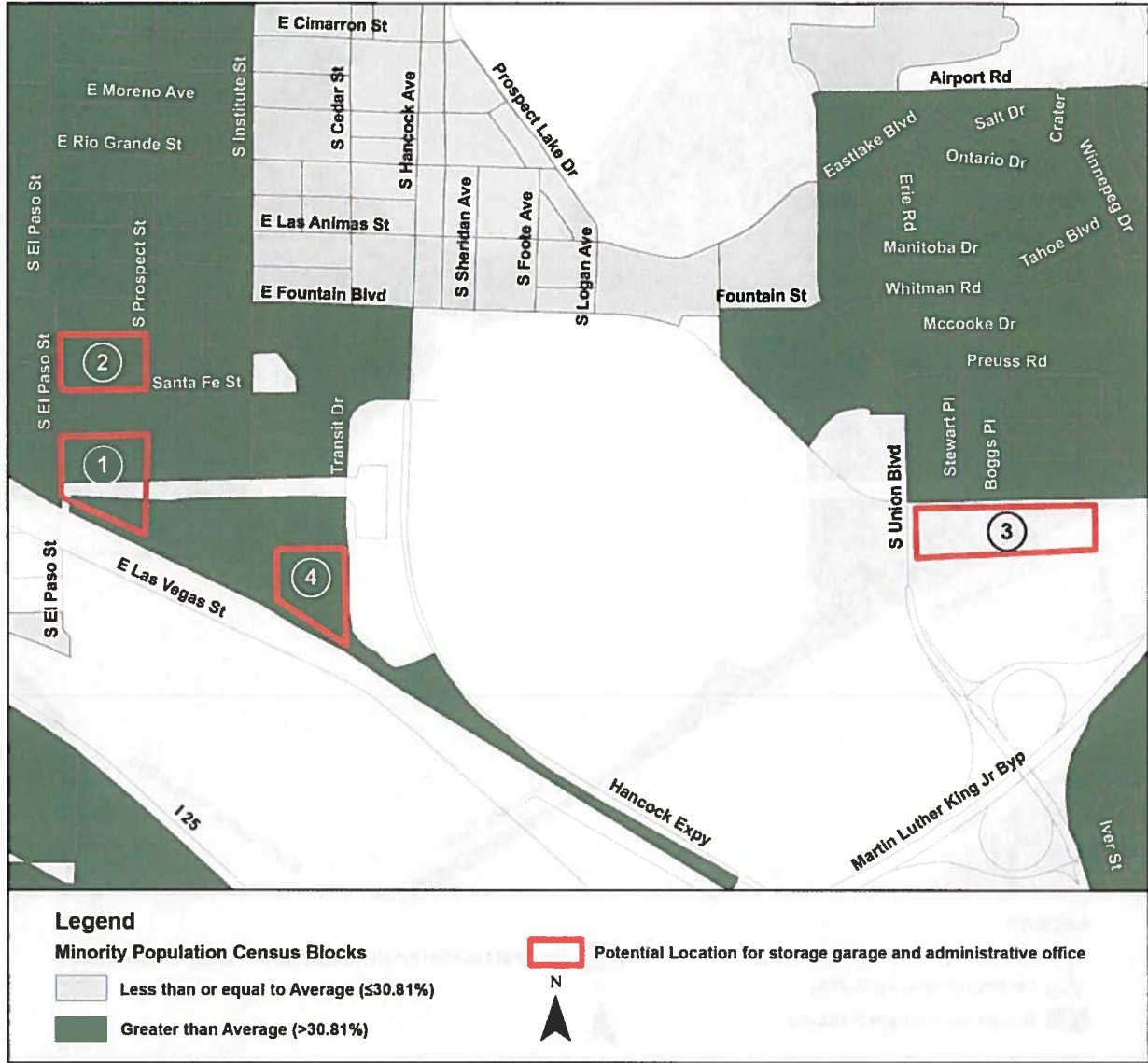
Figure 2 indicates that sites 1, 2, and 4 are located within census blocks containing above-average minority populations while site 3 is located within a zero-population block. Similarly, Figure 3 shows sites 1, 2, and 4 are located within census blocks containing above-average low-income populations.

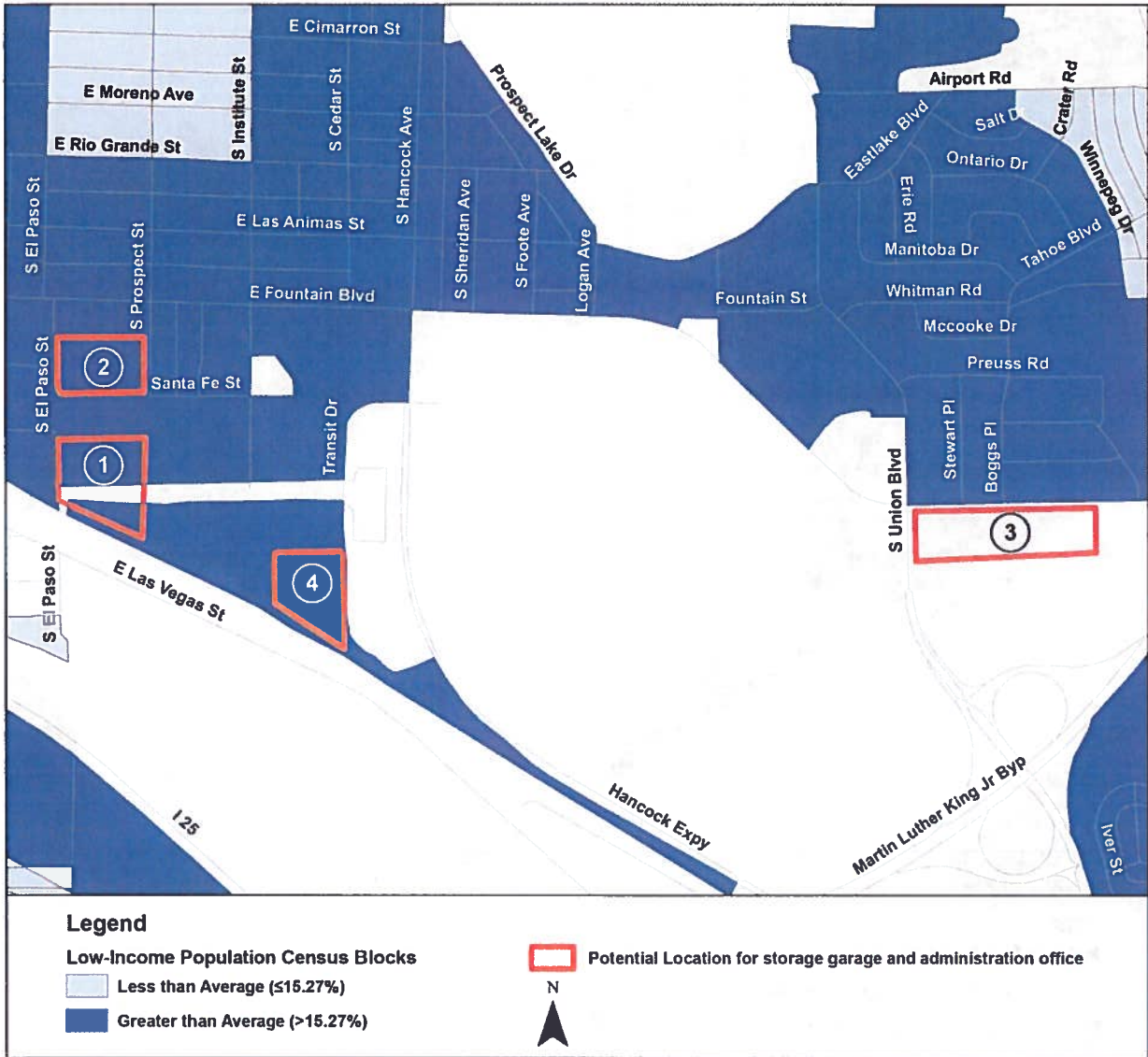
To determine whether a disparate impact exists, the proportion of the minority population impacted by the proposed site is divided by the proportion of the non-minority population impacted by the buildings. If the resulting quotient is 1.2 or higher, a disparate impact may exist.

To determine whether a disproportionate burden exists, the proportion of the low-income impacted by the proposed site is divided by the proportion of the non-low-income population impacted by the site. Similar to making a determination of disparate impact, if the resulting quotient is 1.2 or higher, a disproportionate burden may exist.

The City of Colorado Springs Planning & Community Development Department employs a notification boundary of up to 1,000 feet when soliciting input from property owners who may be adversely impacted by a proposed project. In keeping with the notification threshold, MMT staff selected census blocks within 1,000 feet of each proposed site and calculated the percentages of minority, non-minority, low-income, and non-low-income populations that could be impacted by the proposed development.







The site at 1031 S El Paso Street (denoted with a “1” on the maps) is located along a dead-end portion of S El Paso Street adjacent to several industrial properties. Within 1,000 feet of the site are 39 total census blocks. Of the 39 blocks, 27 contain no population. The population in the remaining 12 blocks indicates that site 1 would potentially impact a greater percentage of non-minority and non-low-income residents than minority and low-income residents.

Population Group	1031 S El Paso St	Percent Impacted	Comparison Index
Minority Population	243	48.80%	0.95
Non-Minority Population	255	51.20%	
Low-Income Population	56	11.24%	0.13
Non-Low-Income Population	442	88.76%	

Site 2, addressed as 933 S El Paso Street, is located along S. El Paso Street between E Fountain Boulevard and Fort Worth Street. Within 1,000 feet of the site there are 34 total census blocks, 9 of which are not populated. The population in the remaining 25 blocks is a greater proportion of both non-minority and non-low-income than minority and low-income.

Population Group	933 S El Paso St	Percent Impacted	Comparison Index
Minority Population	407	44.19%	0.79
Non-Minority Population	514	55.81%	
Low-Income Population	158	17.16%	0.21
Non-Low-Income Population	763	82.84%	

The site addressed as 2049 E Fountain Boulevard (denoted with a “3” on the maps) is located southeast of the intersection of E Fountain Boulevard and S Union Boulevard within a zero-population block. There are 80 census blocks located within 1,000 feet of the site, 16 of which contain population. These 16 blocks include more non-low-income persons than low-income persons, but more minority persons than non-minority persons. The Comparison Index of 1.49 may indicate evidence of a disparate impact if site 3 were to be chosen.

Population Group	2049 E Fountain Blvd	Percent Impacted	Comparison Index
Minority Population	1,413	59.82%	1.49
Non-Minority Population	949	40.18%	
Low-Income Population	56	19.35%	0.24
Non-Low-Income Population	442	80.65%	

The final site at 1190 Transit Drive (denoted as “4” on the maps) is located at the end of Transit Drive and is currently owned by the City of Colorado Springs. Within 1,000 feet of the site are 68 census blocks, 4

of which contain population that is non-minority and non-low-income in greater proportion than minority and low-income.

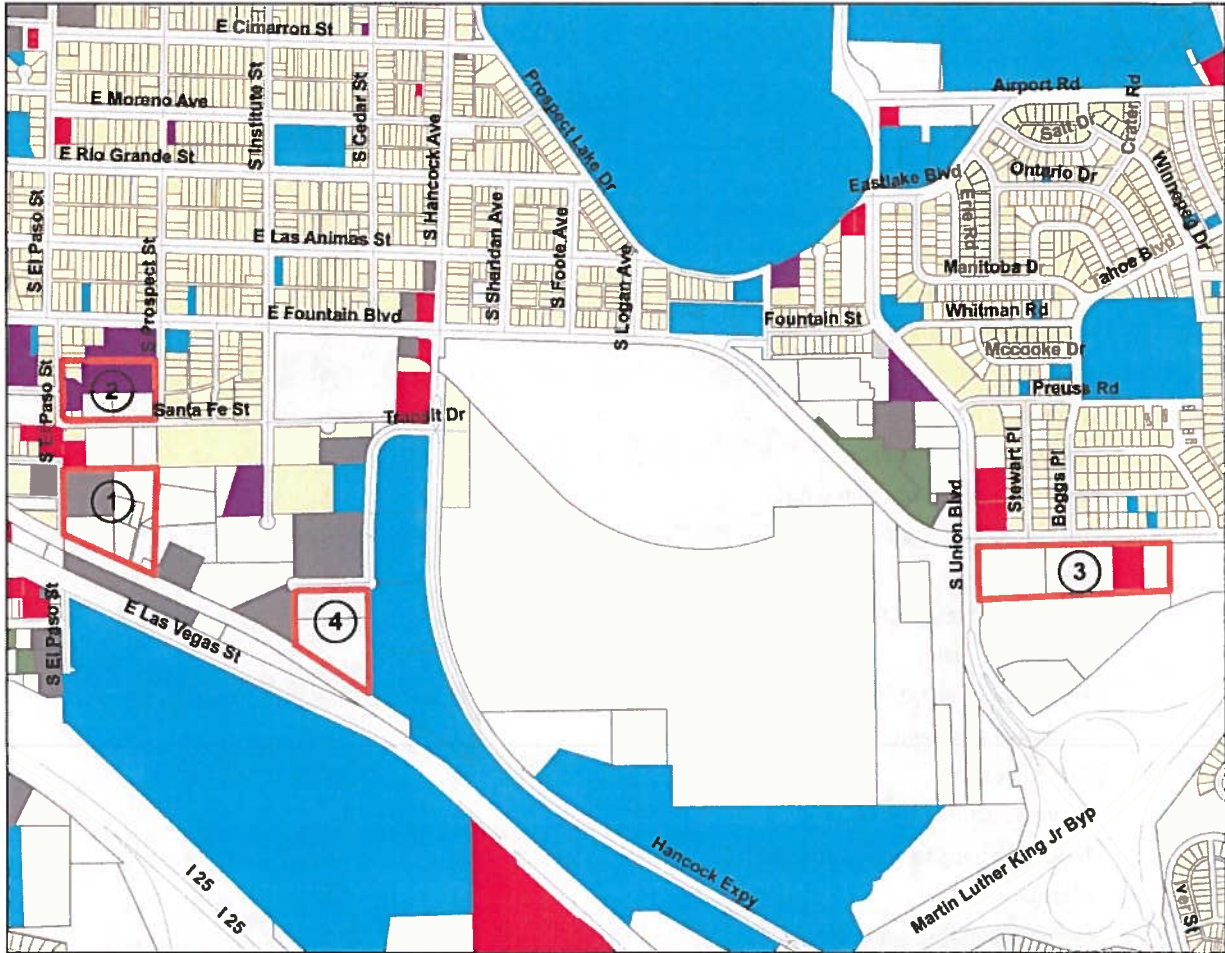
Population Group	1190 Transit Dr	Percent Impacted	Comparison Index
Minority Population	139	40.76%	0.69
Non-Minority Population	202	59.24%	
Low-Income Population	30	8.80%	0.10
Non-Low-Income Population	311	91.20%	

Based on the demography of census blocks within 1,000 feet of each potential location, only site 3 indicates the potential for evidence of disparate impact. There is no indication of potential disproportionate burden related to any of the four sites.

Analyzing the land uses of nearby properties provides additional insight as to which properties may be most affected by the new buildings and uses. Figure 4 shows surrounding land use by structure classification.









Sites 1 and 2 are located directly adjacent to properties with residential structures; residents in these buildings may bear the greatest impact and additional mitigation may be required during the design process. Site 3 is separated from residential properties by E Fountain Boulevard, which is a four-lane Principal Arterial, but may still require mitigation in order to lessen impacts on residences. Site 4 is separated from the nearest residential property by a dead-end Residential Street and a large property with utility structures.

Uses of structures on properties within 1,000 feet of each location appear in Table 5. Of the 4 potential locations, site 4 at 1190 Transit Drive shows potential for impact on the fewest properties and fewest dwelling units as compared to the other locations, making it the preferred location for the bus storage garage and administrative office building.



**Legend**

**Land Use by Structure Type**

- |                                                                                                                                       |                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
|  Residential                                       |  Institutional or community facilities                           |
|  Sheds, farm buildings, or agricultural facilities |  No structure                                                    |
|  Commercial                                        |  Potential Location for storage garage and administration office |
|  Utility and other nonbuilding structures          |                                                                                                                                                     |
|  Public Assembly                                   |                                                                                                                                                     |



Structure Use	Location			
	1	2	3	4
	1031 S El Paso	933 S El Paso	2049 E Fountain	1190 Transit
4-Plex	1	1	12	--
Apartment Building	2	2	4	2
Commercial Utility Building	4	--	--	--
Condominium Unit	--	--	18	--
Convenience Market	--	--	1	--
Distribution Warehouse	2	1	--	2
Duplexes-Triplexes	8	8	--	--
Exempt Religious Worship	3	4	1	1
Exempt Political Subs/Pub School	1	--	2	7
Exempt Religious Residential	2	2	--	--
Exempt Residential Political Sub	--	5	4	--
Frame Average Quality	39	128	143	1
Frame Fair Quality	12	25	--	--
Masonry Average Quality	3	8	--	--
Masonry Fair Quality	1	1	--	--
Mini-warehouse	1	--	--	--
Minor Structures, Vacant Land	3	--	--	--
Miscellaneous Site Improvements	1	1	2	--
Mortuary	--	--	1	--
Neighborhood Shopping Center	--	--	1	--
Nursing Home	--	--	1	--
Office	1	1	--	--
Restaurant	--	--	1	--
Retail Store	1	1	--	--
Service Garage	6	2	--	--
Storage Garage	3	2	2	1
Storage Warehouse	12	5	--	2
Taxable Portion of Church	1	1	--	--
Utility Building	1	--	--	--
<b>Total Properties within 1,000 ft</b>	<b>108</b>	<b>198</b>	<b>193</b>	<b>16</b>
<b>Total Dwelling Units on Parcels within 1,000 ft</b>	<b>114</b>	<b>215</b>	<b>408</b>	<b>24</b>

**CONCLUSION**

Based on demographic and land use data, the property at 1190 Transit Drive is the best location for the planned bus storage garage and administrative office building. The data indicates **no evidence of disparate impact or disproportionate burden** related to 1190 Transit Drive.

**APPROVAL**

   
\_\_\_\_\_  
Craig Blewitt                      Date  
Transit Services Manager



**DATE:** May 17, 2018

**TO:** Craig Blewitt, Transit Services Manager

**FROM:** Erin McCauley, Transit Planning Data Analyst

**SUBJECT TITLE:** Major Service Change Equity Analysis – Proposed Fall, 2018 Service Changes

### **SUMMARY**

As a recipient of Federal Transit Administration (FTA) resources, Mountain Metropolitan Transit has a federally-approved Title VI Program and is required to conduct a Title VI and Environmental Justice equity analysis in the course of planning a Major Service Change or any fare change. Analysis of demographic data of MMT riders as well as populations in Census Blocks within the vicinity of the fixed-route system shows **no evidence of disparate impact or disproportionate burden** regarding any of the route or fare changes proposed for fall, 2018.

### **PROPOSED SERVICE CHANGES**

MMT proposes to add three new routes to its fixed-route weekday service and to increase frequency on two existing routes. Additionally, MMT proposes to add a new fare type (a Special 31-Day Pass for eligible riders); the suggestion of a new fare type originated from the public process regarding the spring, 2018 service changes.

#### **New Routes**

- **Route 18** – A 6.83-mile route proposed to run predominately north/south on Union Boulevard from Boulder Street at the south to Montebello Drive at the north. The route is proposed to run on 45-minute headways and will intersect Routes 5 and 25, which both currently operate on 15-minute headways during weekdays. Route 18 is classified as a Non-Minority, Non-Low-Income route.
- **Route 38** – A 7.16-mile limited-stop express route, proposed to run from Montebello Drive at the south to Memorial Hospital North and Children's Hospital at the north. Route 38 is proposed to run on 45-minute headways and will intersect Route 25 as well as Route 18. Route 38 is classified as a Non-Minority, Non-Low-Income route.
- **Route 40** – A 5.79-mile limited-stop express route, proposed to run north/south on Voyager Parkway from the Voyager Transfer Center at the south to the Pikes Peak Community College Rampart Range Campus at the north. Route 40 is proposed to run on 30-minute headways and will connect with 15-minute Route 25 and 60-minute Route 39 at the Voyager Transfer Center. Route 40 is classified as a Non-Minority, Non-Low-Income route.



Figure 1. Proposed Route 18



Figure 2. Proposed Route 38

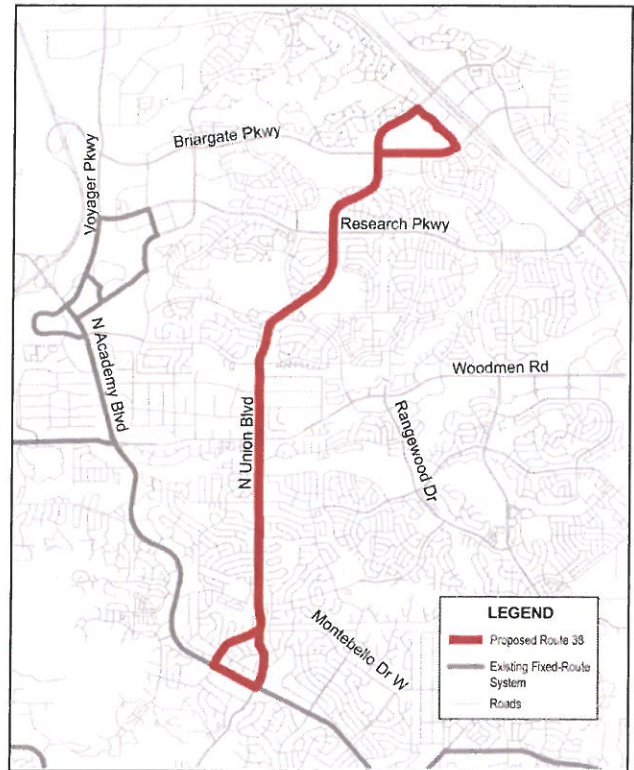
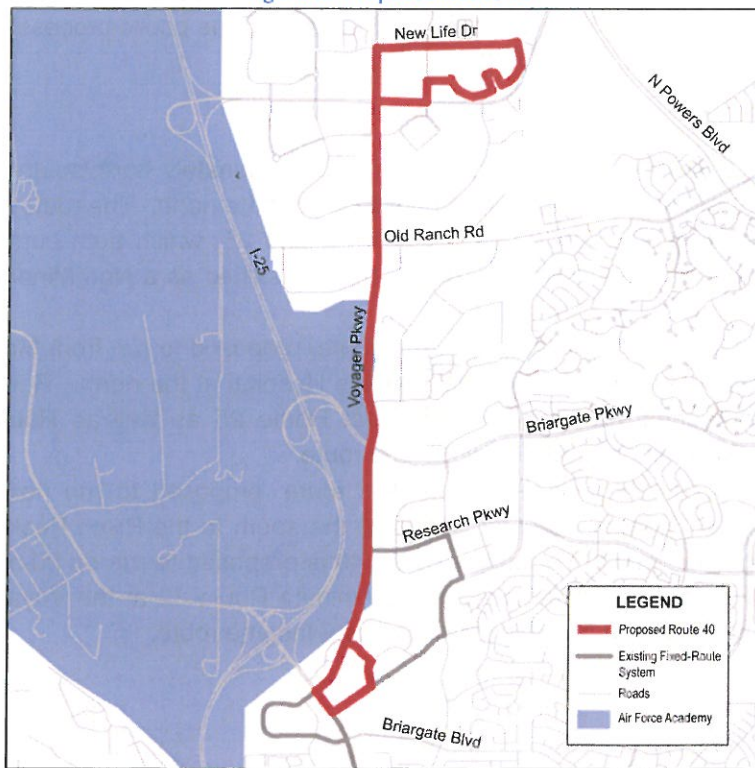


Figure 1. Proposed Route 40



### **Increased Frequency**

- Route 1 – A 7.0-mile route connecting the Downtown Transfer Center to the Academy Super Stop currently operating on 30-minute headways during weekdays. MMT proposes to double the frequency of Route 1 to 15 minutes. Route 1 is classified as a Minority, Low-Income route.
- Route 27 – A 7.7-mile route connecting the Citadel Transfer Center to the PPCC Transfer Center currently operating on 30-minute headways during weekdays. MMT proposes to double the frequency of Route 27 to 15 minutes. Route 27, like Route 1, is classified as a Minority, Low-Income route.

### **Special 31-Day Pass**

The current one-way fare on MMT's fixed-route service is \$1.75, which includes three transfers to be used in two hours if requested at time of fare payment. Some riders may be eligible for a discounted, or special, half-fare of \$0.85 if at least one of the following criteria is met:

- Youth – ages 6 to 18;
- Medicare/Disabled; or
- Senior – ages 60 and above.

In addition to the discounted fare, MMT offers discount passes:

- 31-Day Ticket, good for unlimited one-way trips during a consecutive 31-day period for \$63.00;
- An Adult 20-Ride Ticket, good for 20 one-way trips for \$32.00;
- A Special 20-Ride Ticket, good for 20 one-way trips, available to those who qualify for \$16.00;
- A Summer Haul Pass, good for unlimited one-way trips from June 1<sup>st</sup> through August 31<sup>st</sup> for kids 18 years old and younger for \$25.00; and
- A Day Pass, good for unlimited one-way trips during the day in which it was issued (pass expires at midnight) for \$4.00.

Currently MMT offers a Special 20-Ride Ticket but not a Special 31-Day Pass. During the public process for the spring, 2018 service changes several riders requested a discounted 31-Day Pass for riders who are eligible to pay half-fare. MMT proposes to add such a pass to its fare options in the fall of 2018.

### **PURPOSE OF THIS ANALYSIS**

As a recipient of Federal Transit Administration (FTA) resources, Mountain Metropolitan Transit has a federally-approved Title VI Program and is required to conduct a Title VI and Environmental Justice equity analysis in the course of planning a Major Service Change or any fare change. The approved 2017 MMT Title VI Program identifies a major service change as “a change greater than or equal to 30 percent of operational hours [defined as “the time that a bus is providing service to the public, excluding layover/recovery time, deadhead time, or other instances where transit service is not being provided”] on any route or the addition or elimination of any route within the system.” The proposed additions of Routes 18, 38, and 40 and proposed increased frequencies to Routes 1 and 27 meet the definition of a Major Service Change. The proposed addition of a Special 31-Day Pass constitutes a fare change.

### **APPROACH**

In accordance with MMT's approved Title VI Program and to provide granularity to service analyses, the most recent American Community Survey (ACS) 5-Year Estimates was obtained from the U.S. Census Bureau at the Block Group level and distributed to individual Blocks.

Tables B03002 (Hispanic or Latino Origin by Race) and C17002 (Ratio of Income to Poverty Level) from the 2016 ACS 5-Year Estimates were downloaded for all Block Groups in El Paso County and were distributed to individual Blocks using population percentages from the 2010 Decennial Census. For example, if the 2010 data showed a Block contained 10% of the population of its parent Block Group, it was assumed the Block then contains 10% of the minority and low-income population estimated in the 2016 ACS data.

The distributed demographics were then joined to spatial boundaries at the Census Block level. Blocks with their centroids within ¾ mile and ¼ mile of MMT Routes were selected and exported for analysis.

**DATA**

Demographic data used in this analysis came from the U.S. Census Bureau, Tables B03002 and C17002 within the 2016 American Community Survey 5-Year Estimates. The data was mapped by MMT staff in ESRI ArcGIS Desktop 10.2 software using the approach described above.

**DEMOGRAPHIC ANALYSIS**

In its current configuration, the fixed-route system serves 68.4% of the minority population and 79.8% of the low-income population and provides direct access (defined for this purpose as blocks with their centroids within ¼-mile of a route) to 44.9% of the minority population and 58.3% of the low-income population within the Colorado Springs Urbanized Area (UZA).

**Table 1. MMT Service Area Compared to Colorado Springs UZA**

Population Group	Current System to UZA Comparison (2016 ACS Data)			Comparison Index
	Colorado Springs UZA	MMT Service Area*	Percent Served	
Minority Population	184,036	125,823	68.4%	1.16
Non-Minority Population	413,235	242,735	58.7%	
Low-Income Population	69,238	55,257	79.8%	1.34
Non-Low-Income Population	514,883	306,568	59.5%	
All Routes	597,271	368,558	61.7%	

*\*MMT Service Area defined as census blocks having their centroids within the 3/4-mile ADA Service Area.*

To determine whether a disparate impact exists, the proportion of the minority population served by transit is divided by the proportion of non-minority population served by transit. If the resulting quotient is 0.8 or lower, a disparate impact may exist.

To determine whether a disproportionate burden exists, the proportion of the low-income population served by transit is divided by the proportion of the non-low-income population served by transit. Similar to making a determination of disparate impact, if the resulting quotient is 0.8 or lower, a disproportionate burden may exist.

The current MMT fixed-route system serves a greater proportion of the minority and low-income populations within the Colorado Springs UZA compared to the non-minority and non-low-income populations as shown in Tables 1 and 2. Thus, system-wide there is no evidence of either disparate impact or disproportionate burden.

Figure 2. Minority Census Blocks within the MMT Service Area

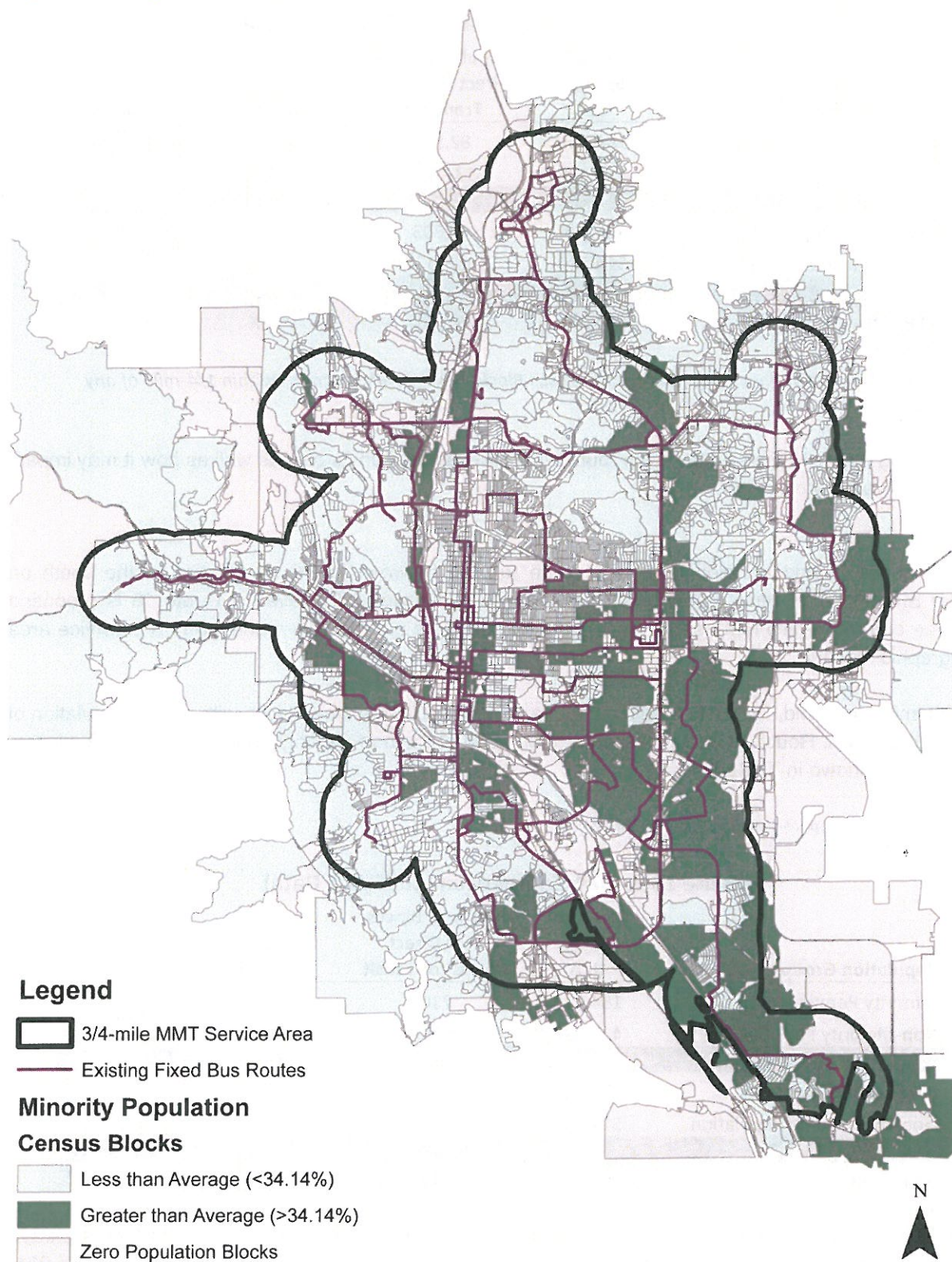


Table 2. Census Blocks Directly Adjacent to the Fixed-Route System Compared to the Colorado Springs UZA

**Current System to UZA Comparison (2016 ACS Data)**

Population Group	Colorado Springs UZA	Population with Direct Access to Transit**	Percent Served	Comparison Index
Minority Population	184,036	82,558	44.9%	1.35
Non-Minority Population	413,235	137,397	33.2%	
Low-Income Population	69,238	40,393	58.3%	1.72
Non-Low-Income Population	514,883	175,074	34.0%	
<b>All Routes</b>	<b>597,271</b>	<b>219,955</b>	<b>36.8%</b>	

\*\*Direct Access defined as population of Census Blocks having with centroids within 1/4-mile of any route.

When adding routes to the system, each route must be examined on its own as well as how it may impact the greater fixed-route system.

**Route 18**

MMT proposes to add a Union Boulevard route running between 15-minute service at the south on Boulder Street and 15-minute service at the north on N. Academy Boulevard. Route 18 is proposed within the current 3/4-mile MMT service area and will therefore not result in a change to the service area demographic makeup.

At the 1/4-mile threshold, Route 18 would contact an additional 70 Census Blocks with a total population of 3,394. On its own, Route 18 serves a greater proportion of the non-minority population than the minority population as shown in Table 3.

Table 3. Route 18 Compared to the Colorado Springs UZA

**Route 18 to UZA Comparison (2016 ACS Data)**

Population Group	Colorado Springs UZA	Route 18 Blocks with Direct Access to Transit	Percent Served	Comparison Index
Minority Population	184,036	710	0.4%	0.67
Non-Minority Population	413,235	2,681	0.6%	
Low-Income Population	69,238	479	0.7%	1.16
Non-Low-Income Population	514,883	2,842	0.6%	
<b>All Routes</b>	<b>597,271</b>	<b>3,394</b>	<b>0.6%</b>	

Route 18 is not meant solely to serve new riders and populations, but rather is meant to facilitate travel within the existing system and provide additional access to important destinations. Data from the 2017 MMT on-board survey, This is How We Roll, shows that MMT riders are disproportionately minority and

low-income as compared to the cities of Colorado Springs and Manitou Springs and El Paso County<sup>1</sup>. This means that Route 18 will arguably serve a greater proportion of the minority population of the UZA than non-minority population.

Additionally, Route 18 would provide service to the East Library – a destination MMT riders have been requesting at public meetings and via telephone and email since service was cut during the Great Recession. Route 18 would also provide another way for riders to access the proposed Route 38, which would provide access to Memorial Hospital North and surrounding medical offices, as well as to Children’s Hospital, which is currently under construction.

**Therefore, this analysis finds no evidence of either disparate impact or disproportionate burden regarding the addition of Route 18 to the fixed-route system.**

**Route 38**

As previously mentioned, MMT proposes to add a new route to serve Memorial North and Children’s Hospitals, as well as the medical offices within the immediate vicinity of those hospitals. Route 38 is proposed as a limited-stop express route, operating on 45-minute headways.

Currently none of the medical facilities north of Research Parkway and east of Explorer Drive are served by Transit. MMT contracts with local Human Service Providers (HSPs) to provide access to seniors and people with disabilities, but transit riders who are ineligible for such services have had to rely on other transportation options such as taxis and rides from friends or family members. Adding Route 38 to the fixed-route system provides a needed connection to these outlying medical facilities.

As shown in Table 4, Route 38 is proposed to run through predominately non-minority and non-low-income areas. Route 38 is proposed to be a limited-stop express route, however, so only the areas adjacent to the medical facilities will be able to access the route.

Table 4. Route 38 Compared to the Colorado Springs UZA

Route 38 to UZA Comparison (2016 ACS Data)				
Population Group	Colorado Springs UZA	Route 38 Blocks with Direct Access to Transit	Percent Served	Comparison Index
Minority Population	184,036	2,746	1.5%	0.63
Non-Minority Population	413,235	9,765	2.4%	
Low-Income Population	69,238	853	1.2%	0.52
Non-Low-Income Population	514,883	11,614	2.3%	
<b>All Routes</b>	<b>597,271</b>	<b>12,511</b>	<b>2.1%</b>	

As with Route 18, the main purpose of Route 38 is to serve existing transit riders who are disproportionately minority and low-income as compared with the overall populations of the cities of Colorado Springs, Manitou Springs, and El Paso County. **Therefore, this analysis finds no evidence of either disparate impact or disproportionate burden regarding the addition of Route 38 to the fixed-route system.**

<sup>1</sup> (Mountain Metropolitan Transit, 2017) 14-15.

### Route 40

MMT has partnered with Pikes Peak Community College (PPCC) to provide unlimited access to the fixed-route bus system via a Student Pass Program. PPCC students approved a student fee via popular vote in the spring of 2018 that will not only subsidize student travel on transit, but will also subsidize a new route travelling from the Voyager Transfer Center to the Rampart Range Campus during weekdays, known as Route 40. Route 40 is proposed to run at 30-minute headways and is a limited-stop express route with stops only proposed at the northern and southern ends of the route.

Route 40 is classified as a non-minority and non-low-income route based on its location. As shown in **Table 5**, there appears to be evidence of both disparate impact and disproportionate burden. However, if the demographics of current MMT riders is examined in conjunction with the Census Block data, the opposite conclusion may be drawn.

Table 5. Route 40 Compared to the Colorado Springs UZA

Population Group	Colorado Springs	Route 40 Blocks	Percent Served	Comparison Index
	UZA	with Direct Access to Transit		
Minority Population	184,036	48	0.03%	0.60
Non-Minority Population	413,235	200	0.05%	
Low-Income Population	69,238	18	0.03%	0.75
Non-Low-Income Population	514,883	230	0.04%	
<b>All Routes</b>	<b>597,271</b>	<b>248</b>	<b>0.04%</b>	

According to the results of the 2017 on-board survey, approximately 5% of all MMT riders attend PPCC. Of the students who also provided demographic information, approximately 60% reported ethnicities other than White or Caucasian. Adding bus service to the northernmost PPCC Campus will allow current and future PPCC students to take classes at any campus.

**Therefore, this analysis finds no evidence of either disparate impact or disproportionate burden regarding the addition of Route 38 to the fixed-route system.**

### Route 1

Route 1 currently connects the Downtown Terminal to the Academy Super Stop via Fountain Boulevard and runs every 30 minutes during weekday service. The route is classified as both a Minority Route and a Low-Income Route,<sup>2</sup> and features high ridership. According to MMT’s service standards, routes that perform higher than the system-wide average should be considered for increased frequency.

Route performance may be examined in two ways – ridership in terms of clock hours (sometimes referred to as “service span”) and ridership in terms of revenue service hours. The first metric provides insight as to how many riders are transported by the route during any given hour of the day; the second metric provides insight as to the number of riders transported by an individual bus assigned to a route during any given hour of the day.

<sup>2</sup> (SRF Consulting Group, Inc., 2017) 8.

In terms of ridership per clock hour, Route 1 is the fourth-highest performing route and falls within one standard deviation above the system-wide average making it an ideal candidate for 15-minute frequency. Route 1 ranks even higher when examined in terms of ridership per revenue service hour, which indicates each bus assigned to the route transports a large number of people (just under 25 per revenue service hour).

Figure 3. Route Performance as Measured by Ridership in Terms of Service Span, or Clock Hour

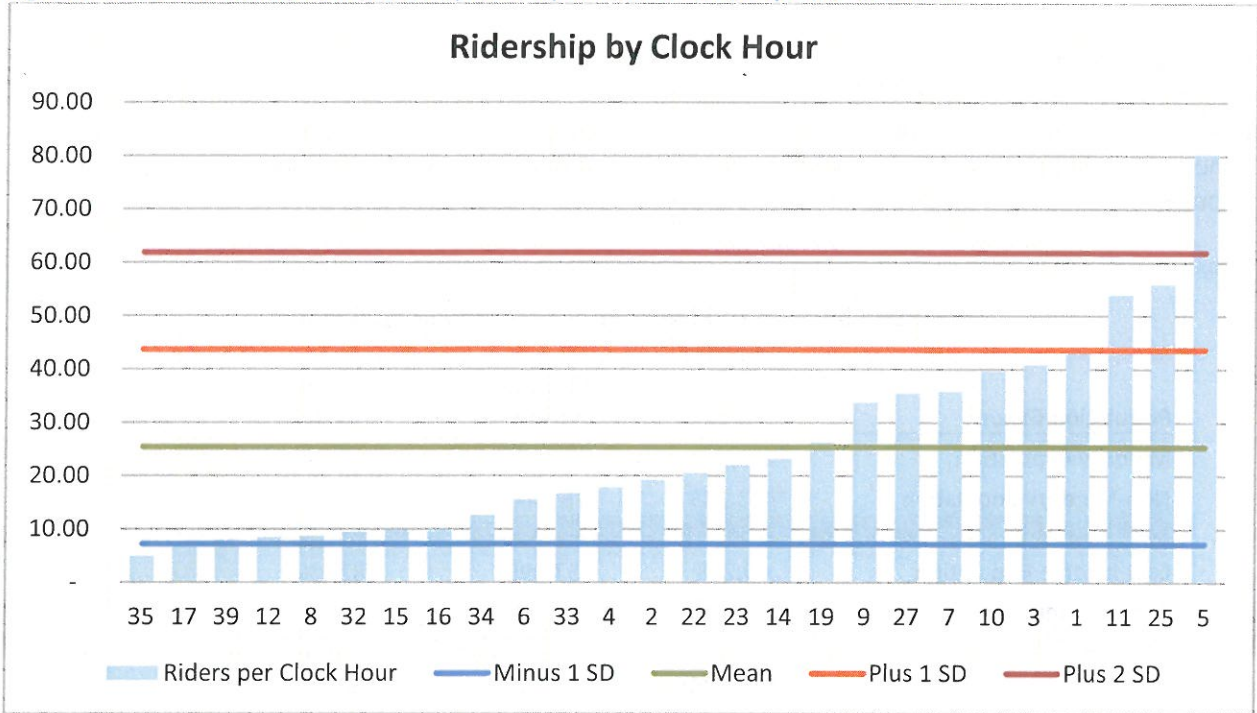
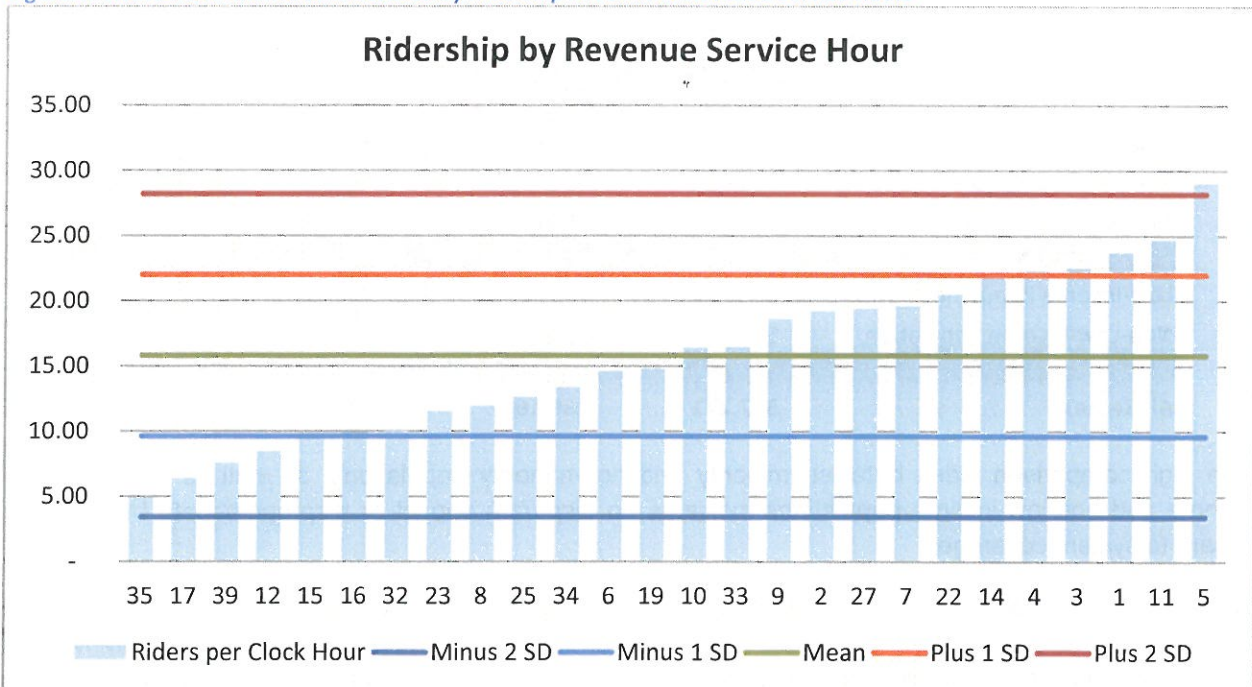


Figure 4. Route Performance as Measured by Ridership in Terms of Revenue Service Hours





**Route 27**

Like Route 1, Route 27 is an existing route running every 30 minutes on weekdays and is classified as both a Minority Route and a Low-Income Route. Route 27 is ranked eighth in terms of performance by clock hour and ninth in terms of performance by revenue service hour. Although other routes perform better than Route 27, increasing service to 15 minutes will provide a high-frequency corridor on all of Academy Boulevard (Route 25 currently runs 15-minute service) and will facilitate transfers throughout the system.

**Cumulative Impact**

The proposed addition of Routes 18, 38, and 40 to the fixed-route system only minimally impact the balance between the proportion of the minority population of the UZA served by transit and the non-minority population of the UZA served by transit. The balance between low-income and non-low-income populations is also minimally impacted, as shown by Tables x and x, below.

**Table 6. Proposed System Compared to the Colorado Springs UZA**

<b>Proposed System to UZA Comparison (2016 ACS Data)</b>				
<b>Population Group</b>	<b>Colorado Springs UZA</b>	<b>MMT Service Area*</b>	<b>Percent Served</b>	<b>Comparison Index</b>
Minority Population	184,036	132,295	71.9%	1.11
Non-Minority Population	413,235	267,444	64.7%	
Low-Income Population	69,238	57,090	82.5%	1.26
Non-Low-Income Population	514,883	335,814	65.2%	
<b>All Routes</b>	<b>597,271</b>	<b>399,739</b>	<b>66.9%</b>	

**Table 7. Populations with Direct Access to Transit Compared to the Colorado Springs UZA – Proposed System**

<b>Proposed System to UZA Comparison (2016 ACS Data)</b>				
<b>Population Group</b>	<b>Colorado Springs UZA</b>	<b>Population with Direct Access to Transit**</b>	<b>Percent Served</b>	<b>Comparison Index</b>
Minority Population	184,036	86,062	46.8%	1.29
Non-Minority Population	413,235	150,044	36.3%	
Low-Income Population	69,238	41,743	60.3%	1.63
Non-Low-Income Population	514,883	189,761	36.9%	
<b>All Routes</b>	<b>597,271</b>	<b>236,108</b>	<b>39.5%</b>	

The high comparison index between minority and non-minority populations, as well as between low-income and non-low-income populations indicates no disparate impact or disproportionate burden with regard to system coverage.

At least annually, ridership and operating hours are tabulated for each route and analyzed to determine a system-wide mean and standard deviation. Routes performing at or below the mean are recommended to run at frequencies of 60 minutes while routes performing within one standard deviation above the mean

are recommended to run at 30 minute intervals and routes performing above one standard deviation above the mean are recommended to run every 15 minutes.

**Table 8** shows minority and low-income status by route, weekday service frequency, and whether or not the route’s performance meets its frequency. Routes 1 and 27 both perform at levels above the mean but not at levels greater than one standard deviation above the mean, indicating that 30-minute service is warranted. However when additional factors are considered, both Routes 1 and 27 are candidates for more frequent service and will facilitate greater movement within the existing fixed-route system at greater headways.

**Table 8. Minority and Low-Income Route Status**

Route	Minority Route Status	Low-Income Route Status	Weekday Frequency	Proper Headway
1	Minority Route	Low-Income Route	15-min*	No
2	Non-Minority Route	Non-Low-Income Route	60-min	Yes
3	Non-Minority Route	Low-Income Route	30-min	Yes
4	Non-Minority Route	Non-Low-Income Route	60-min	Yes
5	Minority Route	Low-Income Route	15-min	Yes
6	Non-Minority Route	Low-Income Route	60-min	Yes
7	Non-Minority Route	Low-Income Route	30-min	Yes
8	Minority Route	Low-Income Route	60-min	Yes
9	Non-Minority Route	Low-Income Route	30-min	Yes
10	Non-Minority Route	Non-Low-Income Route	30-min	Yes
11	Minority Route	Low-Income Route	30-min	No
12	Non-Minority Route	Low-Income Route	60-min	Yes
14	Non-Minority Route	Non-Low-Income Route	60-min	Yes
15	Minority Route	Low-Income Route	60-min	Yes
16	Non-Minority Route	Low-Income Route	60-min	Yes
17	Non-Minority Route	Non-Low-Income Route	60-min	Yes
18	Non-Minority Route	Non-Low-Income Route	45-min	Unknown
19	Non-Minority Route	Low-Income Route	30-min	Yes
22	Minority Route	Low-Income Route	60-min	Yes
23	Non-Minority Route	Non-Low-Income Route	60-min	Yes
25	Non-Minority Route	Non-Low-Income Route	15-min	Yes
27	Minority Route	Low-Income Route	15-min*	No
32	Minority Route	Non-Low-Income Route	60-min	Yes
33	Non-Minority Route	Low-Income Route	20-min	Yes
34	Non-Minority Route	Non-Low-Income Route	60-min	Yes
35	Minority Route	Non-Low-Income Route	30-min	Yes
38	Non-Minority Route	Non-Low-Income Route	45-min	Unknown
39	Non-Minority Route	Non-Low-Income Route	60-min	Yes
40	Non-Minority Route	Non-Low-Income Route	30-min	Unknown

To determine equity, minority routes are compared to non-minority routes and low-income routes are compared to non-low-income routes to determine whether there is evidence of a disparate impact or disproportionate burden, respectively.

Table 9. Headway Comparison – Minority and Low-Income Routes

<b>Proposed Route Headway Comparison</b>				
<b>Population Group</b>	<b>% 60-min Routes</b>	<b>% 30- to 45-min Routes</b>	<b>% 15- to 20-min Routes</b>	<b>% Meeting Recommended Headways</b>
Minority Population	44.4%	22.2%	33.3%	66.7%
Non-Minority Population	50.0%	40.0%	10.0%	100.0%
<b>Comparison Index</b>	<b>0.89</b>	<b>0.55</b>	<b>3.33</b>	<b>0.67</b>
Low-Income Population	40.0%	33.3%	26.7%	80.0%
Non-Low-Income Population	57.1%	35.7%	7.2%	100.0%
<b>Comparison Index</b>	<b>0.70</b>	<b>0.93</b>	<b>3.71</b>	<b>0.80</b>
<b>All Routes</b>	<b>48.3%</b>	<b>34.5%</b>	<b>17.2%</b>	<b>87.0%</b>

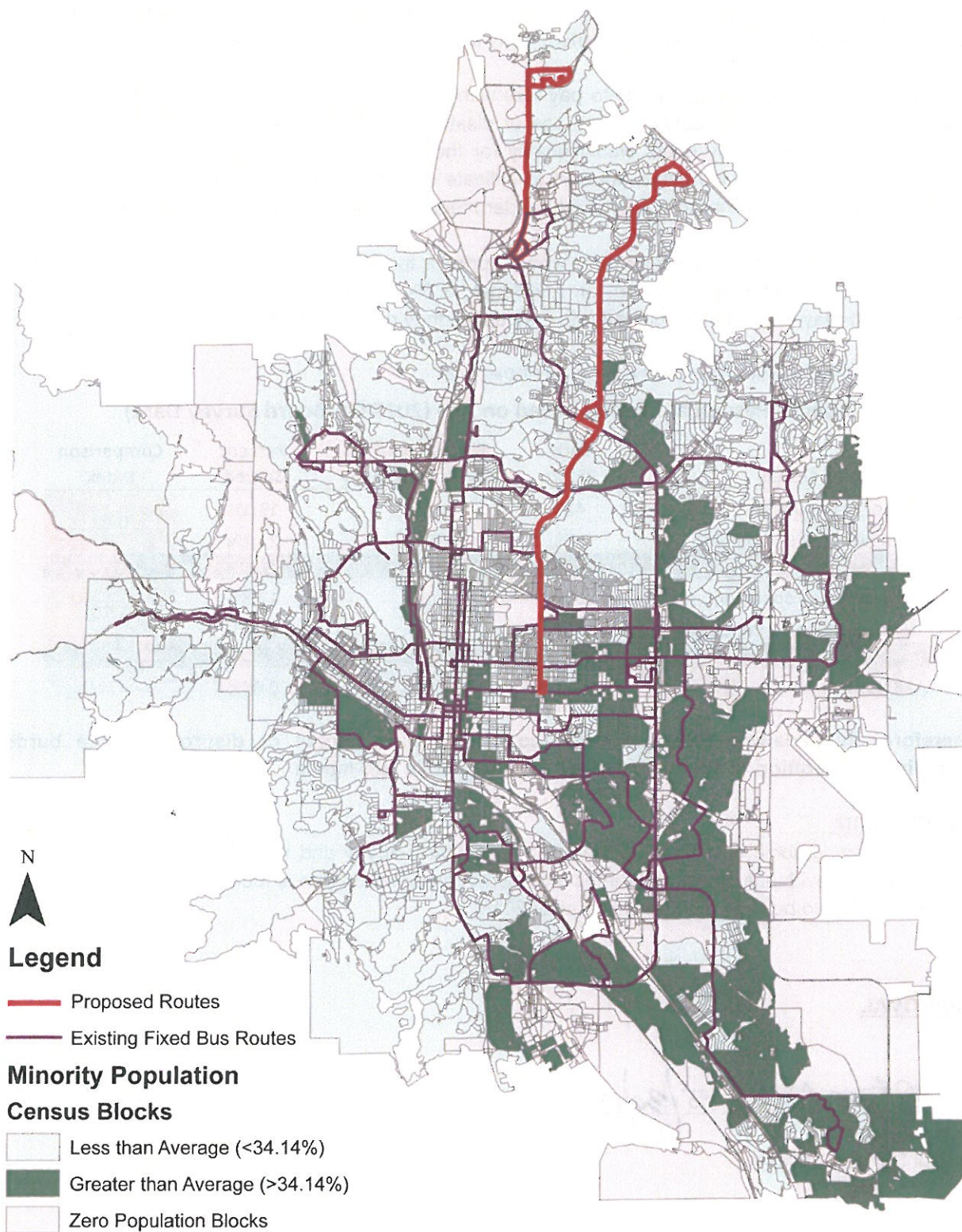
The comparison indices shown in **Table 9** appear to indicate a disparate impact on minority populations when the percentage of minority routes meeting recommended headways is compared to the percentage of non-minority routes meeting recommended headways. Only one of the minority routes – Route 11 – is operating at a frequency below what is recommended based on performance. Adding frequency to Route 11, however, is not operationally feasible as it shares the S. Nevada Avenue corridor with Route 10. Routes 10 and 11 work in concert to provide a 15-minute corridor through which riders may access the Terminal from other connecting routes.

The table also appears to indicate evidence of disproportionate burden on low-income populations, but Route 11 is also the only low-income route operating at a frequency below recommendation and it is not feasible to increase its frequency at this time.

Though Route 1 does not perform at a level greater than one standard deviation above the system-wide mean, it is the next logical candidate for increased frequency. Routes 3 and 7 would be candidates for increased frequency before Route 27, but will not benefit the whole system the way a 15-minute Academy Boulevard corridor would.

Based on the reasons cited in the above sections, this analysis finds **no evidence of disparate impact or disproportionate burden** related to increasing frequency on Routes 1 and 27.

Figure 5. Minority Population of Census Blocks Adjacent to Proposed System



### Special 31-Day Pass

MMT's 2017 on-board survey data indicates that minority populations are less likely to pay fares using tickets or passes and preferred to use cash at a rate 5.8% greater than non-minority populations. Low-income populations, however, were much more likely to use the 31-Day Pass for fare payment.<sup>3</sup>

Although minority riders are less likely to pay fare with a pass, a discounted 31-Day Pass could be an option for those riders who qualify through age or disability. When age and minority status are cross-tabulated, 13.1% of minority riders would qualify for the discounted pass based on age alone. The comparison index in the table below appears to indicate evidence of disparate impact, but the discount policy is applicable to all ethnicities provided the rider meets the age or disability requirement.

When low-income survey responses (those who reported a total household income of less than \$20,000 in 2016) are cross-tabulated with age, an additional 17.8% of low-income riders would be eligible to purchase a 31-Day Pass at a discounted rate – an option they do not currently have.

Table 10. Rider Demographics and Eligibility for Special 31-Day Pass

Special Pass Qualification based on Age (2017 On-Board Survey Data)				
Population Group	Total Riders	Riders Meeting Age Requirement	Percent Served	Comparison Index
Minority Population	421	55	13.1%	0.62
Non-Minority Population	586	124	21.2%	
Low-Income Population	602	107	17.8%	1.16
Non-Low-Income Population	360	55	15.3%	
All Routes	597,271	248	0.04%	

Therefore, this analysis finds no evidence of disparate impact or disproportionate burden regarding the addition of a Special 31-Day Pass to MMT's fare media.

### CONCLUSION

Based on demographic data from both the 2017 on-board survey and the 2016 American Community Survey, neither evidence of disparate impact or disproportionate burden is found related to the proposed service changes to be implemented in the fall of 2018.

### APPROVAL

  
Craig Blewitt  
Transit Services Manager

  
Date

<sup>3</sup> (SRF Consulting Group, Inc., 2017) 24.

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**DATE:** January 11, 2018  
**TO:** Craig Blewitt, Transit Services Manager  
**FROM:** Erin McCauley, Transit Planning Data Analyst  
**Subject Title:** Fare Equity Analysis: Eliminating Free ADA Fixed-Route Fare

**SUMMARY**

Analysis of 2017 on-board rider survey data shows no evidence of disparate impact or disproportionate burden on populations protected under Title VI of the Civil Rights Act of 1964 or the Environmental Justice Executive Order of 1994.

**BACKGROUND**

Current MMT policy allows ADA Complementary Paratransit-eligible customers to ride the fixed-route system for free when they swipe their paratransit identification cards. The intent of the policy was to save transit funds by encouraging paratransit clients to utilize fixed-route service whenever they are able to do so. Also, MMT provides a reduced fare (half-fare) card to persons who provide proof of disability from Social Security, Medicare, or the Veterans Administration. The half-fare card covers individuals who are disabled but not certified to ride the paratransit service.

In the recent past a significant number of paratransit clients have only used fixed-route service, indicating that their disabilities do not require them to ride paratransit. Thirty-eight percent (38%) of paratransit clients who used fixed-route between July 2, 2017 and September 23, 2017 did not use paratransit at all during the preceding year.

The proposed fare change is to eliminate free fare on fixed-route for paratransit-eligible clients. The proposal will improve equity among disabled riders, but will also retain the cost incentive for paratransit clients to ride fixed-route service when they are able.

**OVERVIEW**

Fare Change Proposed:	Eliminating ADA Paratransit free fare on fixed-route, thereby charging half-fare for all persons with disabilities.
Current Fare Type:	Free for ADA Paratransit clients; \$0.85 for individuals with proof of disability on fixed-route. \$3.50 for ADA Paratransit clients on paratransit service.
Benefits:	Improves equity among passengers with disabilities and retains cost incentive for paratransit clients to ride fixed-route when they are able.
Proposed Effective Date:	September 30, 2018



## **PURPOSE OF THIS ANALYSIS**

As a recipient of Federal Transit Administration (FTA) resources, Mountain Metropolitan Transit has a federally-approved Title VI Program and is required to conduct a Title VI and Environmental Justice equity analysis in the course of planning a “major” service change or any fare change. The approved MMT Title VI Program identifies a major service change as a change greater than or equal to 30% of operational hours on any route of the system, changes over a three-year period that when combined constitute greater than or equal to 30% of operational hours on any route of the system, elimination of an existing route, implementation of a new route, or any fare change.

## **APPROACH**

MMT staff utilized recently-collected on-board survey data for the analysis of race, color, and national origin as required by the Federal Transit Administration (FTA) Title VI Circular 4702.1B and income level required by FTA Environmental Justice Circular 4703.1. Minority and low-income rider populations were analyzed against non-minority and non-low-income populations to determine whether disparate impact or disproportionate burden may result from the proposed fare change. Per the current MMT Title VI Program, a determination of **disparate impact** shall be made if:

1. The adverse impacts of a fare or major service change borne by the minority population are more than 20% greater than the impacts borne by the non-minority population; or
2. The positive impacts of a fare or major service change borne by the non-minority population are more than 20% greater than the impacts borne by the minority population.

Additionally, a determination of **disproportionate burden** shall be made if:

1. The adverse impacts of a fare or major service change borne by the low-income population are more than 20% greater than the impacts borne by the non-low-income population; or
2. The positive impacts of a fare or major service change borne by the non-low-income population are more than 20% greater than the impacts borne by the low-income population.

## **DATA**

Data used in this analysis came from the most recent fixed-route on-board survey that was conducted in February of 2017.

## **DEMOGRAPHIC ANALYSIS**

### **Non-White Population**

The 2017 on-board survey included 1,122 unduplicated responses, 1,057 of which were riders on routes that required fare payment (i.e. not the Manitou Shuttle, which is free). Of those responses, 962 included data on ethnicity. Non-White responses numbered 360, while White responses numbered 602. Thus, MMT fixed-route ridership is 62.58% white and 37.42% non-white.

Paratransit clients were identified from the survey data by controlling for method of payment. Of the 1,122 unduplicated survey responses, 1,025 included data regarding fare payment. Fourteen (14) respondents indicated they paid their fare with a paratransit identification card, representing 1.37% of all responses.

Since this proposed fare change will only affect paratransit clients, determination of disparate impact must be made using the demographic data pertaining to that group. Approximately 33.33% of paratransit riders who ride fixed-route are non-White compared to 66.67% who are White, as shown by Table 1. The impact to both the minority and non-minority populations (charging \$0.85 fare instead of allowing free fare) is the same; therefore, there can be no determination of disparate impact.

Also when the population of non-White paratransit riders is compared against the survey population, a slightly smaller percentage of non-White riders are affected, as paratransit clients tended to be more likely to be White than non-White.

**Table 1: Ethnicity**

	<b>MMT System</b>	<b>Paratransit Clients*</b>
<b>Total Fare-Paying Survey Population</b>	1,025	14
<b>Total Responses with Ethnicity Data</b>	962	12
<b>Response Rate</b>	93.85%	85.71%
<b>Non-White Population</b>	360	4
<b>Percent Non-White</b>	37.42%	33.33%

*\*Paratransit Clients are those who reported paying with "Other" and described a Metro Mobility card, disabled bus pass, or similar term.*

### **Primary Language Other Than English**

The on-board survey collected information about riders' primary languages, but did not ask riders to provide detail as to how well they speak English. Therefore it will be assumed that if a rider provided a primary language other than English, that rider could be limited-English proficient.

Of all the unduplicated responses from fare-paying riders, 86.34% provided data as to their primary language. System-wide, only 5.08% of riders might be classified as limited-English proficient, compared to 0.00% of paratransit riders who ride fixed-route. Since the fare increase from free to half-fare only applies to paratransit-certified riders who ride fixed-route bus service, there can be no determination of disparate impact to limited-English populations.

**Table 2: Primary Language Other Than English**

	<b>MMT System</b>	<b>Paratransit Clients*</b>
<b>Total Fare-Paying Survey Population</b>	1,025	14
<b>Total Responses with Language Data</b>	885	12
<b>Response Rate</b>	86.34%	85.71%
<b>Primary Language Other Than English</b>	45	0
<b>Percent Primary Non-English Speakers</b>	5.08%	0.00%

*\*Paratransit Clients are those who reported paying with "Other" and described a Metro Mobility card, disabled bus pass, or similar term.*

### **Low-Income Households**

In 2017, the Department of Health and Human Services (DHHS) released updated poverty guidelines based on gross annual income of and persons in the household. For a one-person household within the 48 contiguous states and the District of Columbia, annual poverty level is set at \$12,060 gross income per year, while a two-person household is set at \$16,240.

The 2017 on-board survey asked riders to provide gross household income for 2016, but did not ask for total persons within the household. Without the household size, it is impossible to determine actual poverty level among MMT riders. However if respondents who reported 2016 annual income as less than \$20,000 are tabulated, nearly 68% of MMT riders could be classified as living either just above, at, or below poverty level.

Comparatively, 90.91% of paratransit clients who completed the fixed-route on-board survey reported 2016 gross annual household incomes of less than \$20,000. While a greater percentage of paratransit

clients riding fixed-route can be classified as low-income, a significant percentage of overall MMT ridership can also be classified as low-income. Requiring all disabled riders to pay half fare instead of allowing paratransit clients to ride free on fixed-route does not result in a disproportionate burden, but rather equalizes treatment across all of MMT ridership.

**Table 3: Low-Income Riders**

	<b>MMT System</b>	<b>Paratransit Clients*</b>
<b>Total Fare-Paying Survey Population</b>	1,025	14
<b>Total Responses with Income Data</b>	886	11
<b>Response Rate</b>	86.44%	78.57%
<b>Less than \$20,000 per Household Responses</b>	602	10
<b>Percent Less than \$20,000</b>	67.94%	90.91%

*\*Paratransit Clients are those who reported paying with "Other" and described a Metro Mobility card, disabled bus pass, or similar term.*

**CONCLUSION**

**APPROVAL**

  
 \_\_\_\_\_  
 Craig Blewitt                      1/12/18  
 Transit Services Manager                      Date