

CITY OF CRIPPLE CREEK TRANSIT



TITLE VI PROGRAM

November 4th, 2020

TABLE OF CONTENTS

A. INTRODUCTION.....	3
A.1. TITLE VI REQUIREMENTS	4
A.2. TITLE VI POLICY	4
B. PROCEDURES FOR FILING A TITLE VI COMPLAINT	5
B.1. Complaint Procedures	5
C. RECORD OF INVESTIGATIONS, COMPLAINTS AND LAWSUITS.....	7
D. ACCESS TO LEP INDIVIDUALS.....	8
E. PROMOTING PUBLIC PARTICIPATION	8
F. NOTIFICATION TO PUBLIC OF PROTECTION UNDER TITLE VI.....	8
H. SUBRECIPIENT COMPLIANCE.....	9
I. RACIAL BREAKDOWN OF APPOINTED BOARDS AND COMMITTEES	9
J. ENVIRONMENTAL JUSTICE.....	10
K. SERVICE MONITORING	10
L. GRANT APPLICATIONS	12
L.1. Statewide Planning Program, Section 5304.....	12
L.2. Elderly and Persons with Disabilities Program, Section 5310	12
L.3. Non-urbanized Area Formula Program, Section 5311.....	12
L.4. Transit Cooperative Research Program, Section 5313	12
M. Equity Analysis	
APPENDIX 1 – CERTIFICATIONS AND ASSURANCES	14
APPENDIX 2 – COMPLAINT FORMS	15
APPENDIX 3 – LEP PLAN	20
APPENDIX 4 - PUBLIC PARTICIPATION PLAN.....	19
APPENDIX 5 – PUBLIC NOTICE.....	10
APPENDIX 6 - ENVIRONMENTAL JUSTICE PLAN	21

A. INTRODUCTION

The City of Cripple Creek operates general public fixed route, demand response, and intercity bus service. Fixed route and demand response service operates within the City of Cripple Creek, while intercity service connects the city with the Town of Victor. The local service includes a seasonal rubber trolley. Service generally operates Monday through Sunday, seven days a week from 7AM to 1 AM during warmer months and from 7AM to 11PM during the colder months. The service area population is under 200,000.

As a recipient of federal financial assistance, City of Cripple Creek Transit is responsible for the effective execution of nondiscrimination laws and regulations. Federal Transit Administration (FTA) Circular 4702.1B, issued October 1, 2012 requires us to fulfill the basic civil rights to all people in the City of Cripple Creek and the surrounding areas we serve. The Title VI Program Plan (Plan) incorporates Chapters III, and IV from the *Title VI Guidelines for FTA Recipients—Circular 4702.1B*. As an agency with a service area population of less than 200,000, the City of Cripple Creek Transit is exempt from incorporating Chapter V, *Program-Specific Requirements and Guidelines for Recipients Serving Large Urbanized Areas*, and Chapter VI, *Program-Specific Requirements and Guidelines for State Departments of Transportation or Other Adminstrating Agencies and Chapter VII, Program Specific Guidance for Metropolitan Transportation Planning Organizations*.

The purpose of the Plan is to describe how City of Cripple Creek Transit will develop and implement the Title VI Program. Its intent is to identify the steps taken and will be taken to ensure that, for all programs and activities supported by Federal financial assistance, City of Cripple Creek Transit provides services without excluding or discriminating on the grounds of race, color or national origin, or creating additional barriers to accessing services and activities. Consistent with its commitment to meet FTA regulatory requirements, Appendix 1 is the signed Certification and Assurances of Compliance with Title VI requirements. Updates to the Plan will be submitted on a triennial basis.

This Plan was prepared in accordance with:

- Title VI Regulations 49 CFR 21
- FTA Circular 4702.1B, October 31, 2012, "*Title VI Guidelines for Federal Transit Administration Recipients*"
- DOT Guidance of 2001: *To Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries*
- Executive Order 13166 of August 11, 2000: Limited English Proficiency
- Executive Order 12898 of February 1994: Environmental Justice Executive Order

The Plan is available in paper copy and alternative formats upon request. To obtain a copy of the Plan in an alternative format, please call or write to:

City of Cripple Creek Transit
Attn: Transit Manager/Title VI Coordinator
P.O. Box 430
Cripple Creek, CO 80813

(719) 689-2502

The Plan is also available on the City of Cripple Creek Transit website at:

www.cripplecreekgov.com

A.1. Title VI Requirements

Title VI of the Civil Rights Act of 1964 and related statutes state that no persons 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 otherwise subjected to discrimination under any program or activity, receiving federal financial assistance. Pursuant to this mandate, recipients of federal financial assistance must take affirmative steps to ensure that discrimination, as addressed by Title VI, does not occur in its organization. These activities fall into one or more of the areas listed below:

- Adoption of Assurances, policies and procedures supportive of Title VI requirements.
- Ensure that the level and quality of transportation services are provided without regard to race, color or national origin.
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Prepare and maintain an Environmental Justice Plan (Executive Order 12898).
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prepare and maintain a Public Participation Plan to ensure adequate public involvement.
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).
- Prepare and maintain a LEP Plan (Executive Order 13166).
- Implement controls and data collection mechanisms to monitor for any adverse treatment or impacts on any groups.
- Ensure that contracting/procurement opportunities are awarded in a nondiscriminatory manner.
- Ensure that subrecipients, contractors, subcontractors, transferees, successors in interest, and other participants comply with all Title VI requirements.
- Conduct Title VI compliance reviews on City of Cripple Creek Transit's subrecipients and programs.

A.2. Title VI Policy

Title VI is a section of the Civil Rights Act of 1964 requiring 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." The official City of Cripple Creek Transit Title VI policy statement is:

The City of Cripple Creek assures that no person shall on the grounds of race, color, sex, age, disability or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. The City further assures every effort will be made to ensure nondiscrimination in all of its programs activities, whether those programs and activities are federally funded or not.

In the event that the city distributes federal aid funds to another entity, the City will include Title VI language in all written agreements and will monitor for compliance.

The City of Cripple Creek Transit Manager/Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports and other City responsibilities as required by 23 Code of Federal Regulation (CFR) 200 and 49 Code of Federal Regulation 21.

If you believe you have been subjected to discrimination, you may file a written complaint no later than 180 calendar days after the date of the alleged discrimination with the Title VI Coordinator; City of Cripple Creek Transit; PO Box 430, Cripple Creek, Colorado 80813.

Adopted: _____

Mayor or Governing Body

B. PROCEDURES FOR FILING A TITLE VI COMPLAINT

It is the policy of City of Cripple Creek Transit to employ its best efforts to ensure that all programs, services, activities, and benefits are implemented without discrimination. This section provides information on City of Cripple Creek Transit 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 interests may file a written complaint with City of Cripple Creek Transit, the FTA, the U.S.DOT Secretary of Transportation or the U.S. Department of Justice (USDOJ). Further, City of Cripple Creek Transit prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure their rights as protected by Title VI.

B.1. Complaint Procedures

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of

1990, for alleged discrimination in any program or activity administered by City of Cripple Creek Transit.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and City of Cripple Creek 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 complaint.

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

1. A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

The preferred method is to file your complaint in writing using the City of Cripple Creek Transit Title VI Complaint Form, and sending it to:

Title VI Coordinator/Transit Manager
City of Cripple Creek
Transit Department
PO Box 430
Cripple Creek, CO 80813

2. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the City of Cripple Creek Transit/Manager/Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Transit Manager/Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
3. When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) calendar days by registered mail.
4. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 calendar days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
5. Within 15 calendar days from receipt of a complete complaint, City of Cripple Creek 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 Manager/Title VI Coordinator will notify the Complainant and Respondent, by registered mail, informing them of the disposition.

6. When City of Cripple Creek Transit does not have sufficient jurisdiction, the Transit Manager/Title VI Coordinator will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
7. If the complaint has investigative merit, the Transit Manager/Title VI Coordinator will fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the City Administrator by the Transit Manager/Title VI Coordinator within 60 calendar days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Transit Manager/Title VI Coordinator will notify the appropriate authorities, and an extension will be requested.
8. The Transit Manager/Title VI Coordinator will issue letters of finding to the Complainant and Respondent within 90 calendar days from receipt of the complaint.
9. If the Complainant is dissatisfied with the City of Cripple Creek Transit's resolution of the complaint, he/she has the right to file a complaint with the:

Federal Transit Administration
Region 8
Attn: Civil Rights Officer
12300 West Dakota Avenue
Suite 310
Lakewood, CO 80228
720-963-3300
Fax 720-963-3333

A copy of the City of Cripple Creek Transit's Complaint Form is included in Appendix 2. FTA Complaint procedures can also be found on the FTA web site at: www.fta.dot.gov.

C. Record of Investigations, Complaints and Lawsuits

Over the past three years, there were no complaints, investigations or lawsuits filed upon City of Cripple Creek Transit alleging discrimination on the basis of race, color, or national origin. All allegations of Title VI discrimination will be tracked and monitored for compliance with this Plan. The recording of the complaint and or lawsuit will include:

- Date the complaint, investigation or lawsuit was filed.
- Summary of the allegation(s).
- The status of the complaint, investigation or lawsuit.
- Actions taken by City of Cripple Creek Transit in response to the complaint, investigation or lawsuit findings.

The recording of the complaint, investigation or lawsuit will be provided to FTA in the

Triennial report, or upon request.

D. Access to LEP Individuals

Limited English proficient (LEP) individuals are those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. In keeping with Title VI requirements, City of Cripple Creek Transit provides language assistance to ensure that its LEP users have meaningful access to its services, including route information, telephone based customer service, printed materials including public meeting notices, and other customer based services.

City of Cripple Creek Transit has applied the Four-Factor Framework needs assessment in Section V of the *Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency Persons* and prepared a comprehensive LEP Plan that supplements the Title VI Plan, as a separate document in Appendix 3.

E. PROMOTING PUBLIC PARTICIPATION

Public involvement is fundamental and essential in achieving equitable program, services and activities. Public participation provides for public involvement of all persons, minorities and low-income persons, affected public agencies, employees, the general public, transportation service providers, public transit users and other interested parties of the community affected by transit and transportation plans, programs and projects.

In order to integrate, into community outreach activities, consideration expressed in the DOT Order on Environmental Justice, and the DOT LEP Guidance, City of Cripple Creek Transit will seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. The City of Cripple Creek Transit's public participation strategy shall offer 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. City of Cripple Creek Transit's Public Participation Plan is included as a separate document in Appendix 4.

F. NOTIFICATION TO PUBLIC OF PROTECTION UNDER TITLE VI

City of Cripple Creek Transit acknowledges the need to notify the public of their civil rights under Title VI requirements for all its services, projects, and activities. City of Cripple Creek Transit has prepared a poster and sticker on the public rights under Title VI. The poster and sticker contains:

1. A statement that the City of Cripple Creek Transit operates its programs and services without regard to race, color, or national origin.
2. A description of the procedures that the public should follow in order to request additional information on City of Cripple Creek Transit's nondiscrimination obligations.

3. A description of the procedures that the public should follow in order to file a discrimination complaint.

Appendix 5 includes the Title VI notification in English and in Spanish.

City of Cripple Creek Transit will use various media methods to disseminate the Title VI notification--brochures and poster regarding the public's rights and obligations. The Title VI poster and brochures will be disseminated:

- On the City of Cripple Creek Transit website at: www.cripplecreekgov.com
- At the City of Cripple Creek Transit office
- At minority and low-income organization offices
- At public and project meetings on subjects related to the City of Cripple Creek Transit
- At transit stations
- On transit vehicles

H. SUBRECIPIENT COMPLIANCE

Presently, City of Cripple Creek Transit does not have Federal grant sub grantees, requiring no effort on our part. However, the Transit Manager/Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's consultant contracts process. The Transit Manager/Title VI Coordinator will:

- Include Title VI language in contracts and Requests for Proposals (RFP) as described below:
 - Ensure the text in Appendix 1 (Title VI Assurance) is included in all agency contracts.
 - Notify all contractors that the text in Appendix E to DOT Title VI Assurance (minus section 6) should be included in all subcontracts.
 - Ensure that Title VI notification is included in all City of Cripple Creek Transit RFPs.

When/if City of Cripple Creek enters into sub grantee relationships in the course of our transit operations, we will ensure that the proper documentation and oversight is in place per FTA Circular 4702.B.

I. RACIAL BREAKDOWN OF APPOINTED BOARDS AND COMMITTEES

City of Cripple Creek Transit utilizes a singular committee, the Transit Advisory Committee or TAC, for planning, decision-making, and information dissemination. The TAC is comprised of City of Cripple Creek staff, Town of Victor staff, Casino representation, and

area Human Services provider representatives. Table 1 summarizes the racial breakdown of the TAC.

Table 1 – Cripple Creek Transit TAC

AGENCY	NAME/TITLE	ETHNICITY
Cripple Creek	Ray White, City Administrator	White
Cripple Creek	Paul Harris, Financial Officer	White
Cripple Creek	Ted Schweitzer Transportation Mgr	White
Victor	Richard Mann City Administrator	White
Casino Association	Jeff Weist Director	White
Community of Caring	Ted Borden, Executive Director	White
Teller Senior Coalition	Dianna VanAucken, Transportation Mgr.	White
Cripple Creek	Mary Wagner, Transportation Supervisor	White

J. ENVIRONMENTAL JUSTICE

Environmental justice is the public policy goal of promoting the fair treatment and meaningful involvement of all people in the decision-making for transportation service changes and projects. Satisfying this goal means ensuring that low-income and minority communities receive an equitable distribution of the benefits of transportation activities without suffering disproportionate adverse impacts.

The complete Mountain Metropolitan Transit Environmental Justice Plan is attached as Appendix 6.

K. SERVICE MONITORING

FTA Circular 4702.1B mandates that all operators of fixed route service must incorporate quantifiable performance standards to effectively monitor the equitable distribution of transit resources and performance of the transit system. The following four elements are required by FTA for all operators of fixed route transit to meet Title VI requirements:

Vehicle Load Standards

All the Cripple Creek Transit buses are 12 and 14 passenger body on chassis with a capacity of one person per seat. All transit buses have 2 mobility device positions independent of fold down seats.

Vehicle Type	Seated	Standing	Total	Maximum load factor
Body on Chassis	12-16	0	12-16	1.0

Vehicle Headway Standards

The amount of time between two vehicles traveling in the same direction on a given line or combination of lines. Service operates on two separate routes. Wednesday the transit departs Cripple Creek for Woodland Park at 845am for the Hwy 67 line. Monday thru Sunday the transit departs Cripple Creek for Victor at 1115am, 215pm, 515pm and 1115pm for the Hwy 67 line.

Please see an attached route schedule at <https://cityofcripplecreek.com/>

On-Time Performance Standards

100% of the Cripple Creek Transit buses will complete their established runs no more than 10 minutes late in comparison to the established schedule. If a Bus is running late, Cripple Creek Transit will use its social media outlets to notify the public.

Service Availability Standards

Cripple Creek Transit service availability is based upon accessible park and rides and stations located along the respective commuter routes.

System-Wide Policies

Vehicle Assignment Policy

Vehicle assignments are based on mileage. Cripple Creek Transit maintain the mileage on each vehicle as even as possible. The buses are rotated on routes when needed to keep the mileage even. Cripple Creek has a designated dispatch team that assigns the buses to routes and facilitates the maintenance of the vehicles.

Amenities Policy

Each Transit bus coach is equipped with automated stops, air conditioning and retractable service steps. There is also a wheelchair lift and two wheelchair securement areas on each transit bus.

L. GRANT APPLICATIONS

City of Cripple Creek Transit is a recipient of FTA financial assistance and intends to continue its quest of additional FTA grant applications that include:

L.1. Statewide Planning Program, Section 5304

Section 5304 funds can be used for a wide variety of transit related support activities, including: transit technical assistance, planning, research, demonstration projects, special studies, training and other similar projects.

L.2. Elderly and Persons with Disabilities Program, Section 5310

The Section 5310 program provides financial assistance to eligible agencies for meeting the transportation needs of older adults and individuals with disabilities in areas where mass transportation services are unavailable, insufficient, or inappropriate. Financial assistance is in the form of capital grants to purchase accessible vans and busses, communication equipment, and computer hardware and software.

L.3. Non-urbanized Area Formula Program, Section 5311

The Section 5311 program provides operating and capital grants to eligible agencies for the provision of public transportation in non-urbanized areas. The term “non-urbanized” includes rural areas and urban areas under 50,000 population not included in an urbanized area. Section 5311 funding is intended to assist in the development and support of intercity bus transportation.

L.4. Transit Cooperative Research Program, Section 5313

The Transit Cooperative Research Program (TCRP) is an applied, contract research program that develops near-term, practical solutions to problems facing transit agencies. The transit industry driven program, TCRP, promotes operating effectiveness and efficiency in the public transportation industry by conducting practical, near-term research designed to solve operational problems, adopt useful technologies from related industries and introduce innovation that provides better customer service. The industry driven program serves as one of the principal means by which the transit industry can develop innovative short-term solutions to meet demands placed on it.

M. Equity Analysis

A FTA subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers. There are many steps

involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site. Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement. Cripple Creek Transit is exploring development opportunities, due to COVID-19 all opportunities are on hold due to funding constraints. Cripple Creek transit has no current or anticipated plans to construct a new transit facility covered by these requirements within the next three years. When a new transit facility is planned, the City will complete and document a Title VI Equity Analysis and include that information in this Appendix.

APPENDIX 1 – CERTIFICATIONS AND ASSURANCES

FTA FISCAL YEAR 2013 CERTIFICATIONS AND ASSURANCES

FEDERAL FISCAL YEAR 2013 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE
(Required of all Applicants for FTA funding and all FTA Grantees with an active Capital or Formula Project)

AFFIRMATION OF APPLICANT

Name of Applicant: CITY OF CRIPPLE CREEK

Name and Relationship of Authorized Representative: RAY WHITE CITY ADMINISTRATOR

BY SIGNING BELOW, on behalf of the Applicant, I declare that the Applicant has duly authorized me to make these Certifications and Assurances and bind the Applicant's compliance. Thus, the Applicant agrees to comply with all Federal statutes and regulations, and follow applicable Federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its authorized representative makes to the Federal Transit Administration (FTA) in Federal Fiscal Year 2013, irrespective of whether the individual that acted on its Applicant's behalf continues to represent the Applicant.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply, as provided, to each Project for which the Applicant seeks now, or may later seek FTA funding during Federal Fiscal Year 2013.

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

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

Signature: [Signature] Date: 8-7-13
Name: RAY A. WHITE
Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): _____

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

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

Signature: _____ Date: _____
Name: _____
Attorney for Applicant

Each Applicant for FTA funding and each FTA Grantee with an active Capital or Formula Project must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its signature in lieu of the Attorney's signature, provided the Applicant has on file this Affirmation, signed by the attorney and dated this Federal fiscal year.

APPENDIX 2 – COMPLAINT FORMS

Title VI Complaint Form

Instructions: If you would like to submit a Title VI complaint to the CRIPPLE CREEK TRANSIT, please fill out the form below and send it to: Cripple Creek Transit , Attn: Transit Manager/Title VI Coordinator, 337 E. Bennett Ave, Cripple Creek, 80222. For questions or a full copy of CRIPPLE CREEK TRANSIT's Title VI policy and complaint procedures call 719-689-2502. Mail to:

1. Name (Complainant):	
2. Phone:	3. Home address (street no., city, state, zip):
4. If applicable, name of person(s) who allegedly discriminated against you:	
5. Location and position of person(s) if known:	6. Date of incident:
7. Discrimination because of: <input type="checkbox"/> Race <input type="checkbox"/> National origin <input type="checkbox"/> Color	
8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.	
9. Why do you believe these events occurred?	
10. What other information do you think is relevant to the investigation?	

11. How can this/these issue(s) be resolved to your satisfaction?		
12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses):		
Name:	Address:	Phone number:

In order to facilitate communications between Cripple Creek Transit employees and persons with limited English proficiency, we have included the Title VI Statement, instructions for filing a Title VI complaint, and the complaint in Spanish:

INSTRUCCIONES DE QUEJAS

Queja de Ciudad de Cripple Creek tránsito y Procedimientos de Investigación Estos procedimientos abarcan todas las quejas presentadas en virtud del Título VI del Acta de Derechos Civiles de 1964, la Sección 504 de la Ley de Rehabilitación de 1973, y la Ley de Estadounidenses con Discapacidades de 1990, por presunta discriminación en cualquier programa o actividad administrada por el ciudad de Cripple Creek tránsito.

Estos procedimientos no niegan el derecho del demandante a presentarse enuncias formales con otras agencias estatales o federales o buscar un abogado privado para las quejas que alegan discriminación. Se hará todo lo posible para obtener la 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 el ciudad de Cripple Creek tránsito puede ser utilizada para su solución. Cualquier persona, grupo de personas o entidad que cree que han sido objeto de discriminación prohibida por el Título VI y los estatutos puede presentar una queja.

Se tomarán las siguientes medidas para resolver las quejas del Título VI:

1. Una queja formal debe ser presentada dentro de los 180 días de la supuesta aparición. Las quejas deben ser por escrito y firmado por la persona o su/su representante, e incluirán el nombre del autor, dirección y número de teléfono, el nombre del presunto oficial de discriminación, base de la queja (raza, color, origen nacional, sexo, discapacidad, edad), y la fecha del supuesto acto (s). Una declaración que detalla los hechos y circunstancias de la supuesta discriminación debe acompañar todas las reclamaciones.

El ciudad de Cripple Creek tránsito recomienda encarecidamente el uso del ciudad de Cripple Creek tránsito Título VI Forma de ciudad de Cripple Creek tránsito junta al presentar denuncias oficiales.

El método preferido es el de presentar su queja por escrito utilizando el ciudad de Cripple Creek tránsito Título VI Forma de ciudad de Cripple Creek tránsito, y enviarlo a:

Title VI Coordinator/Transit Manager
City of Cripple Creek

Transit Department
PO Box 430
Cripple Creek, CO 80222

2. En caso de que el demandante no puede o es incapaz de proporcionar una declaración por escrito, una queja verbal de discriminación puede ser hecha al Title VI Coordinator/Transit Manager. En estas circunstancias, el demandante será entrevistado y el Title VI Coordinator/Transit Manager asistirá al demandante en la conversión de las denuncias verbales a la escritura.
3. Cuando se recibe una queja, el Coordinador del Título VI brindará reconocimiento por escrito al demandante, dentro de los diez (10) días calendario por correo certificado.
4. Si la reclamación se considera incompleta, se solicitará información adicional y el demandante se proporcionará 60 días naturales para presentar la información requerida. De lo contrario, se puede considerar una buena causa para la determinación de ningún mérito investigativo.
5. En el plazo de 15 días naturales desde la recepción de una denuncia completa, el Title VI Coordinator/Transit Manager 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, el Title VI Coordinator/Transit Manager al demandante y al demandado, por correo certificado, informándoles de la disposición.
 - a. Si la decisión no es investigar la denuncia, la notificación se establecerá específicamente la razón de la decisión.
 - b. Si la denuncia se va a investigar, la notificación se indicarán los criterios de competencia del Ciudad de Cripple Creek tránsito, informando a las partes que se requiera su total cooperación en la recopilación de información y asistencia al investigador.
6. Cuando el Ciudad de Cripple Creek tránsito no tiene competencia suficiente, el Title VI Coordinator/Transit Manager emitirá la denuncia al Estado o agencia federal que tiene dicha jurisdicción.
7. Si la queja tiene mérito investigativo, el Title VI Coordinator/Transit Manager de investigar a fondo la denuncia. Se llevará a cabo una investigación completa, y un informe de investigación se presentará al City Manager de los 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 resultado de las recomendaciones y medidas de conciliación en su caso. Si la investigación se retrasa por cualquier razón, el Title VI Coordinator/Transit Manager notificará a las autoridades competentes, y se solicitó una prórroga.
8. Title VI Coordinator/Transit Manager de encontrar a la demandante y al demandado un plazo de 90 días naturales desde la recepción de la queja.

9. Si el demandante no está satisfecho con la resolución de la queja del ciudad de Cripple Creek tránsito, él / ella tiene el derecho de presentar una queja ante la:

Federal Transit Administration
Region 8
Attn: Civil Rights Officer
12300 West Dakota Avenue
Suite 310
Lakewood, CO 80228
720-963-3300
Fax 720-963-3333

Procedimientos de reclamación TLC también se pueden encontrar en el sitio web de TLC:
www.fta.dot.gov.

Formulario de Quejas del Título VI

Instrucciones: Si usted desea presentar una queja del Título VI de la Ciudad de Cripple Creek transporte, por favor rellene el siguiente formulario y envíelo a: Cripple Creek Transit, la atención de: Transit Manager/Title Coordinador, 337 E. Bennett Ave, Cripple Creek, 80222. Si tiene preguntas o una copia completa del Título VI de la política Ciudad de Cripple Creek tránsito y procedimientos que llame 719-689-2502. Mailto:

1. Nombre (Demandante):	
2. Teléfono:	3. Dirección (calle, no, ciudad, estado, código postal.):
4. En su caso, nombre de la persona (s) que su puesta mente discriminó:	
5. Situación y cargo de la persona (s), si se conoce:	6. Fecha de los hechos:
7. La discriminación por motivo de: <input type="checkbox"/> carrera <input type="checkbox"/> origen nacional <input type="checkbox"/> color	

<p>8. Explica la forma más breve y clara posible lo que pasó y cómo usted cree que fue discriminado. Indique quiénes tu voin volucrado. Asegúrese de incluir cómo se sienten otras personas fueron tratadas de manera diferente que tú. También, adjunte cualquier material escrito relacionado con su caso.</p>													
<p>9. ¿Por qué cree que ocurrieron los hechos?</p>													
<p>10. ¿Qué o qué formación cree usted que es pertinente para la investigación?</p>													
<p>11. ¿Cómo puede este / estos problema (s) se resuelve a su satisfacción?</p>													
<p>12. Por favor, indique a continuación cualquier persona (s) podemos ponernos en contacto para obtener información adicional para apoyar o aclarar su queja (testigos):</p> <table border="0"> <tr> <td>Nombre:</td> <td>Dirección:</td> <td colspan="2">Teléfono:</td> </tr> </table>				Nombre:	Dirección:	Teléfono:							
Nombre:	Dirección:	Teléfono:											
<p>13. ¿Ha presentado esta queja con otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?</p> <p><input type="checkbox"/> Sí <input type="checkbox"/> No</p> <p>En caso afirmativo, marque todo lo que corresponda:</p> <table border="0"> <tr> <td><input type="checkbox"/> agencia federal</td> <td><input type="checkbox"/> Corte Federal</td> <td><input type="checkbox"/> Tribunal estatal</td> </tr> <tr> <td><input type="checkbox"/> agencia local</td> <td><input type="checkbox"/> agencia estatal</td> <td></td> </tr> </table> <p>Si se presenta en una agencia y / o de la corte, por favor proporcionar información sobre una persona de contacto en la corte / agencia / donde se presentó la queja.</p> <table border="0"> <tr> <td>Agencia / Corte:</td> <td>Nombre del Contacto:</td> <td>Dirección</td> <td>Teléfono:</td> </tr> </table>				<input type="checkbox"/> agencia federal	<input type="checkbox"/> Corte Federal	<input type="checkbox"/> Tribunal estatal	<input type="checkbox"/> agencia local	<input type="checkbox"/> agencia estatal		Agencia / Corte:	Nombre del Contacto:	Dirección	Teléfono:
<input type="checkbox"/> agencia federal	<input type="checkbox"/> Corte Federal	<input type="checkbox"/> Tribunal estatal											
<input type="checkbox"/> agencia local	<input type="checkbox"/> agencia estatal												
Agencia / Corte:	Nombre del Contacto:	Dirección	Teléfono:										
<p>Firma (Demandante):</p>			<p>Fecha de presentación:</p>										

APPENDIX 3 – LEP PLAN

CITY OF CRIPPLE CREEK TRANSIT



LIMITED ENGLISH PROFICIENCY (LEP) PLAN

November 4th, 2020

TABLE OF CONTENTS

I. INTRODUCTION	1
II. POLICY	2
III. LIMITED ENGLISH PROFICIENCY NEEDS OF AREA.....	2
Number and Percentage of LEP Persons in Our Area Permanent Population ...	2
Visitors	3
Nature, Frequency and Importance of LEP Contact.....	3
Resources to Reach LEP Population	3
Summary	4
IV. CURRENT LEP EFFORTS	4
V. PLANS FOR THE FUTURE LEP EFFORTS	5
Maintenance of Effort: Identifying LEP Persons Who Need Language Assistance	5
Monitoring and Updating Plan.....	5

I. INTRODUCTION

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

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

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

II. POLICY

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

III. LIMITED ENGLISH PROFICIENCY NEEDS OF AREA

The Four-Factor Analysis developed by the FTA requires that information be included in LEP Plans regarding the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have with LEP persons in providing transit services. It also requires that we provide a list of resources that would be needed to respond to LEP outreach. Each of these elements is addressed in this section.

Number and Percentage of LEP Persons in Our Area Permanent Population

The 2010 U.S. Census provides information to assist in estimating the number of limited English speakers in the permanent population. **Table 1** presents information for Teller County and the City of Cripple Creek on Language Spoken at Home by ability to speak and communicate in English.

TABLE 1 - Individuals Speaking English "Less than Very Well"

DATA CATEGORY	TELLER COUNTY		CITY OF CRIPPLE CREEK	
	Number	Percent	Number	Percent
Total Population (5 years old & older)	22,256	100%	1,525	100%
LANGUAGE SPOKEN AT HOME				
English Only	20,744	93.2%	1471	96%
Spanish	768	3.5%	45	3%
Population Speaking English "Less than very well"	230	1.0%	19	1%
Other Indo-European	266	1.0%	9	1%
Population Speaking English "Less than very well"	28	0.1%	0	0%
Asian and Pacific Islander	184	0.8%	0	0%
Population Speaking English "Less than very well"	86	0.4%	0	0%
Other Languages	8	0.0%	0	0%
Population Speaking English "Less than very well"	0	0.0%	0	0%

Source: 2010 US Census

The total Teller County population that had difficulty with speaking English (Population Speaking English "Less than very well") is less estimated at 344 people, or less than 3%, while roughly 1% of the City of Cripple Creek's population has difficulty with English.

The Census data represents a relatively low need and level of response to individuals in our service area, particularly in Cripple Creek, which is where most of the transit service will take place. Persons who do have difficulty with English are primarily Spanish speaking, though there is also a significant population of Asian and Pacific Islanders in Teller County who have difficulty speaking English.

In addition to US Census Data, the City of Cripple Creek also collected ethnicity data from the Colorado State Demographer's Office to ensure that the affected populations match and/or to make further adjustments based on the data. This data is not as language-specific as the Census data, but provides a summary of populations that may have difficulty with English. **Table 2** shows these results.

CRIPPLE CREEK TRANSIT SERVICE

TABLE 2 – Teller County Ethnicity

Age Group	American Indian - Non Hispanic		Asian Non Hispanic		Black Non Hispanic		Hispanic - all races		White non Hispanic		Total
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number
0 to 4	10	0.92%	21	1.93%	19	1.75%	130	11.96%	303	27.87%	1087
5 to 9	10	0.81%	25	2.02%	16	1.29%	121	9.77%	1069	86.28%	1239
10 to 14	16	1.09%	23	1.57%	11	0.75%	129	8.80%	1288	87.86%	1466
15 to 19	27	1.80%	17	1.14%	19	1.27%	134	8.95%	1302	86.97%	1497
20 to 24	6	0.69%	7	0.80%	15	1.71%	81	9.26%	764	87.31%	875
25 to 29	11	1.24%	13	1.46%	16	1.80%	63	7.08%	789	88.65%	890
30 to 34	18	1.87%	14	1.46%	7	0.73%	60	6.24%	865	89.92%	962
35 to 39	13	1.06%	19	1.54%	4	0.33%	80	6.50%	1114	90.57%	1230
40 to 44	12	0.75%	25	1.57%	5	0.31%	106	6.64%	1443	90.41%	1596
45 to 49	30	1.34%	28	1.25%	7	0.31%	120	5.35%	2056	91.58%	2245
50 to 54	28	1.11%	11	0.43%	12	0.47%	86	3.40%	2393	94.51%	2532
55 to 59	34	1.35%	19	0.75%	11	0.44%	73	2.89%	2386	94.46%	2526
60 to 64	17	0.77%	10	0.45%	8	0.36%	60	2.71%	2111	95.43%	2212
65 to 69	12	0.84%	3	0.21%	8	0.56%	22	1.53%	1387	96.72%	1434
70 to 74	3	0.39%	1	0.13%	3	0.39%	10	1.30%	751	97.53%	770
75 to 79	4	0.81%	5	1.02%	0	0.00%	15	3.05%	467	95.11%	491
80 to 84	2	0.80%	0	0.00%	1	0.40%	4	1.60%	241	96.40%	250
85 to 89	0	0.00%	1	0.85%	1	0.85%	1	0.85%	112	95.73%	117
90+ to 94	0	0.00%	0	0.00%	0	0.00%	0	0.00%	29	100.00%	29
Totals	253	1.1%	242	1.0%	163	0.7%	1295	5.5%	20870	89.0%	23,448

Source: Colorado State Demographer's Office

CRIPPLE CREEK TRANSIT SERVICE

The Sate Demographer's Office data is slightly higher than the numbers acquired through the 2010 US Census, however, they do not differ significantly, which further supports the scope and frequency of our outreach efforts.

Though the overall need for outreach is relatively small, there is some daily interaction with persons whose principal language is Spanish. We have based our LEP Plan efforts on this population, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances.

Visitors

There are tens of thousands of annual visitors from all over the world who come to the City of Cripple Creek. Though we do not maintain demographic information on our visitor base, it is assumed that a large number of visitors will have some difficulty with English. The City of Cripple Creek will work with the Casinos and Chamber of Commerce to identify recurring language issues and work diligently to develop outreach solutions.

Nature, Frequency and Importance of LEP Contact

In addition to Census data, the City of Cripple Creek gathered internal data from the transit program to establish usage and assistance levels for current passengers. Transit officials confirmed that one (1) Spanish-speaking person with limited English proficiency used the system between two (2) and three (3) times per week. Additionally, the City estimates that it assists Spanish-speaking individuals once per day on average.

Though the nature and frequency of our LEP contact is relatively insignificant, the contact is important for reasons that include the recurring and critical nature of the LEP person's transit currently provided and the fact that we are providing a public transit service that will include tourists and other members of the general public with English proficiency challenges.

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. Our research indicated that the Spanish-speaking LEP population represents the immediate need and resources will be directed accordingly in the initial stages of our LEP Plan process. The following resources will be needed in developing the initial elements of our LEP Plan:

- Technology that may include language translation resources, real time translation capabilities, and other technology as it becomes identified.
- Reasonable Business Practices including LEP training of staff and drivers, performance monitoring of the LEP plan, and periodic updating as needed.
- Materials and Services that will include printed materials in Spanish and potentially other languages in the future as emerging LEP populations are identified.
- The engagement of organizations and activists with an interest in supporting LEP populations.

Summary

Though the need for outreach is relatively small, there is some daily interaction with persons whose principal language is Spanish. Further, it is assumed that a number of casino and hotel jobs are occupied by people whose primary language is Spanish. We have based our LEP Plan efforts on the Spanish-speaking population initially, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances and population demographics. Also, given the tourist-driven nature of the City of Cripple Creek service area and the large number of visitors we have, many of who have Limited English Proficiency needs, we are committed to developing and maintaining programs that bridge the language gap in our service area.

IV. CURRENT LEP EFFORTS

There are three variables that drive our current LEP efforts: 1) The potential impact of a tourist-driven economy, 2) current ridership of Spanish speaking person, and 3) the new commuter

route between Cripple Creek and Victor is likely to have Spanish-speaking ridership. To address these current markets, the City of Cripple Creek has initiated the following efforts:

- We are in the process of developing new route schedules and brochures. Once completed, we will translate and publish a limited number of these materials in Spanish. These brochures will be distributed via drivers, at the City Building, and mailed on request. Additionally, contact information for available programs and initiatives will be posted on board the vehicles.
- The City of Cripple Creek has three Spanish-speaking persons on staff during normal business hours that will assist with Spanish translation and other directions when needed. The contact information for these people is:

Archie Torres, Parks & Recreation, 719.689.3519
Michael Treacy, Parks & Recreation, 719.689.3519
Officer Lucero, Police Department, 719.689.2655
Office Stocker, Police Department, 719.689.2655

- The City of Cripple Creek has obtained twenty (20) copies of CDOT's "Basic Spanish for Transit Employees" and distributes them to drivers and customer service staff, as appropriate;
- The City of Cripple Creek anticipates adoption of this document in November, 2020.

Given the scale of our current need for LEP services, the City of Cripple Creek believes that this plan adequately addressed the need as well as positioning the City for an expansion of LEP Plan efforts, should that need be established.

V. PLANS FOR THE FUTURE LEP EFFORTS

The current plan is sufficient for present conditions and services. Given the potential expansion of transit services and the tourist-driven nature of the local economy, we have

CRIPPLE CREEK TRANSIT SERVICE

expanded our LEP efforts to look toward the future in monitoring and updating the Plan.

Maintenance of Effort: Identifying LEP Persons Who Need Language Assistance

As part of our ongoing commitment to bridging communications gaps with persons who have limited English proficiency, the City of Cripple Creek will maintain the following efforts:

- Review Census updates as they become available.
- Periodically review perceived LEP needs with our transit staff and drivers.
- Develop Spanish versions of marketing materials, public notices, and related information, as appropriate.
- Consider hiring Spanish-speaking individuals when hiring drivers.
- Become familiar with Language Line Services at <http://www.language-line.com>;
- Identify other community resources such as agencies serving LEP persons which ^{LEP}_{SEP} may have resources to share.
- Document language assistance requests.
- Provide opportunities for LEP participation at public meetings, through ^{LEP}_{SEP} advertising and conduct of meetings, as appropriate.

Monitoring and Updating Plan

The City of Cripple Creek will monitor the LEP Plan annually and update the Plan every 2-3 years, or as needed. These efforts will include:

- Review the performance of the LEP Plan against selected benchmarks; making adjustments, as needed;
- Pay particular attention to demographic changes in our area that have the potential to affect LEP strategies;
- Review LEP-related complaints quarterly and develop programs to mitigate them;^{LEP}_{SEP}
- Disseminate the LEP Plan as appropriate;
- Provide copies of the plan to agencies serving LEP populations in our area and/or individual requests;
- Post the LEP Plan and subsequent changes on the City of Cripple Creek website.

APPENDIX 4 - PUBLIC PARTICIPATION PLAN

As the City of Cripple Creek Transit only began receiving federal funding in 2013, we have developed the Public Participation Plan (PPP). City of Cripple Creek Transit has completed a comprehensive study to determine how, when, and how frequently specific public involvement measures should take place, and what specific measures are most appropriate.

These measures are but not limited to:

City Council Meetings, public comment is encouraged.
Local Coordinating Council meetings
Transit Advisory Committee meetings.

- Reaching people within their own communities and during existing meeting schedules.
- Provision of food, childcare, and translation (LEP) at meetings.
- Presentations focused to specific interests of group.
- Placement of meeting announcements and flyers using different types of media.
- Cultural sensitivity for minority and Native American Tribal groups.
- Identified barriers to overcome public participation.

The PPP includes effective practices on:

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

The Public Participation Survey will be in English and Spanish and enables City of Cripple Creek Transit to collect data to identify residents and communities impacted by Federal financial assisted projects or activities.

APPENDIX 5 – PUBLIC NOTICE

City of Cripple Creek

City of Cripple Creek complies with Title VI of the Civil Rights Act of 1964. The level of quality of transportation service will be provided without regard to race, color, and national origin.

Any person who believes he/she or any specific class of persons is subjected to discrimination prohibited by Title VI may by him/herself or by a representative file a written complaint with the City of Cripple Creek and/or the Federal Transit Administration. All complaints will be properly investigated.

To request additional information on the City of Cripple Creek nondiscrimination obligation contact:

City Clerk
City of Cripple Creek
337 E Bennett Ave
Cripple Creek CO 80813
719-689-2502

Information in languages other than English will be provided as needed and will be consistent with DOT LEP guidance.

La ciudad de Cripple Creek

La ciudad de Riachuelo de Lisiado se conforma con Título a VI del Acto Civil de Derechos de 1964. El nivel de calidad de servicio de transporte será proporcionado sin consideración para competir, el color, y origen nacional.

Cualquier persona que cree a él/ella o cualquier clase específica de personas es sujeta a la discriminación prohibida por Título VI puede por él/ella misma o por un representante archivar una queja escrita con la Ciudad de Riachuelo de Lisiado y/o la Administración Federal de Tránsito. Todas las quejas serán investigadas apropiadamente.

Para solicitar información adicional en la Ciudad de contacto de obligación de no discriminación de Riachuelo de Lisiado:

City Clerk
City of Cripple Creek
337 E Bennett Ave
Cripple Creek CO 80813
719-689-2502

La información en idiomas de otra manera que inglés será proporcionada como necesitado y será consecuente con guía de PUNTO LEP.

APPENDIX 6 - ENVIRONMENTAL JUSTICE PLAN

Introduction and Purpose

Environmental justice is a public policy goal of promoting the fair treatment and meaningful involvement of all people, particularly minority and low-income populations, in the decision-making for transportation. Satisfying this goal means ensuring that low-income and minority communities receive an equitable distribution of the benefits of transportation activities without suffering disproportionate adverse impacts. Achieving environmental justice requires both analytical techniques as well as the full and fair participation by all potentially affected communities in the transportation decision-making process.

City of Cripple Creek Transit plays an essential role in advancing the economy, safety, and quality of life in the City of Cripple Creek. Transportation services and facilities provide mobility to the city's residents, visitors, and businesses. Transportation investments may also generate unintended negative impacts. If poorly planned or designed, new and expanded facilities may be unsightly, increase air pollution and noise, and disrupt or displace established communities. The purpose of City of Cripple Creek Transit's Environmental Justice Plan is to:

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

The City of Cripple Creek Environmental Justice Plan is in place to ensure that minority and low-income populations are not disproportionately affected by transit system operations and/or related facilities construction. The City of Cripple Creek Transit Environmental Justice Plan will be updated triennially and incorporates the requirements and guidance of the following:

- Executive Order 12898 – 1994
- Memorandum of Understanding on Environmental Justice and Executive Order 12898 – August 2011
- DOT Order 5610.2(a) – May 2012
- FTA Circular 4703.1

Environmental Justice Analysis Process

City of Cripple Creek applies the environmental justice analysis process to major service changes (Modifying, adding, or deleting 25% or more of service hours, miles, or bus stops on a route or of the system) and transit facility construction projects. City of Cripple Creek Transit Environmental Justice Process includes the following activities:

CRIPPLE CREEK TRANSIT SERVICE

1. Analyze demographic data
2. Gain meaningful public involvement
3. Determine adverse effects and benefits
4. Mitigate impacts as is feasible

Analysis of Demographic Data

City of Cripple Creek Transit maintains demographic data that includes individual route profiles that identify minority and low-income routes within our Title VI Plan, which is updated triennially. When considering the potential impact of routes changes or facilities construction on these populations, City of Cripple Creek Transit draws on this data to establish their location and to what extent the project may affect them.

Meaningful Public Involvement

City of Cripple Creek Transit utilizes our Public Participation Plan when we make major service changes resulting from planning efforts and/or unforeseen events, and transit facilities construction projects. The City of Cripple Creek Transit Public Participation Plan is included in Appendix 4 of the Title VI Plan. Our public involvement process takes into account the participation of environmental justice populations and how to encourage it. Minimally, our efforts consider the following:

- Potentially affected community members have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can influence our decision;
- The concerns of all participants involved will be considered in the decision-making process; and
- Decision-makers seek out and facilitate the involvement of those potentially affected.

Adverse Impacts/Effects and Benefits

City of Cripple Creek Transit acknowledges that disproportionately high and adverse effects, not population size, are the basis for environmental justice. A very small minority or low-income population in the project, study, or planning area does not eliminate the possibility of a disproportionately high and adverse effect on these populations.

Adverse impacts include elements such as increased pollution, increased noise pollution, increased vehicle traffic, and reduced service levels; while benefits might include increased service levels, positive economic impacts, and area enhancements resulting from increased service or facilities.

If the Environmental Justice analysis process determines that disproportionately high effects or impacts are predominantly borne by an environmental justice population, or appreciably more severe than suffered by the non-environmental justice population, City of Cripple Transit will consider mitigation measures.

Mitigation Actions

When City of Cripple Creek Transit has considered the potential disparate or negative impact on environmental justice populations and has determined that mitigation efforts are warranted, we may undertake the following measures:

1. Avoid the action that may cause a disproportionately high effect on the environmental justice population. Actions could include locating an alternate location, redesigning or reconfiguring a facility or site, or a revision of service change options.
2. Minimize or mitigate the action that may cause a disproportionately high effect on the environmental justice population. Measures may include limitations during construction, sound barriers, speed bumps, and consideration during operations.

Though City of Cripple Creek Transit makes every effort to mitigate disparate impacts when warranted, financial constraints, geographical conditions, real estate location, and other factors may impact the extent of our mitigation efforts. Measures, if undertaken, will be based on the totality of circumstances (negative impacts, benefits, constraints), reflect community input, and be unique to the project.