



125 EAST 11TH STREET, AUSTIN, TEXAS 78701-2483 | 512.463.8588 | WWW.TXDOT.GOV

September 14, 2023

Jesse Arriaga  
Transit Director  
City of South Padre Island Transit Department  
321 Padre Blvd, Suite C  
South Padre Island, Texas 78597

Regarding: Approval of Title VI Plan

Dear Mr Arriaga,

The Texas Department of Transportation (TxDOT) Public Transportation Division (PTN) has reviewed South Padre Island Transit's Title VI Plan. TxDOT PTN gives you concurrence to submit this Title VI Plan for board approval.

The next steps to comply with Title VI Circular 4702.1B is the following:

- Submit the updated Title VI plan to your board for approval.
  - Once approved, upload the plan into IGX with the board meeting minutes or a board resolution.
    - Note: The plan will not be accepted by TxDOT PTN until approved by your board. The expiration date will be three-years from board approval date.
- Website Posting
  - Update the following website documents if they were changed during this process:
    - Public Notice of Title VI (English/Spanish)
    - Complaint Procedures (English/Spanish)
    - Complaint Forms (English/Spanish)

Once these remaining steps are completed, notify your assigned Public Transportation Coordinator (PTC), Joanna Saenz , so TxDOT PTN can document that all required steps are now complete. If you have any questions or concerns about the process, please direct those questions to your assigned PTC as well.

Sincerely,

Christopher Ramirez  
TxDOT PTN Compliance

CC: Joanna Saenz, Public Transportation Coordinator, TxDOT



# **ISLAND METRO TITLE VI PROGRAM**

*Approved October 4, 2023*

In order to comply with the reporting requirements established in FTA Circular 4702.1B, 49 CFR Section 21.9(b), and TxDOT-PTN Title VI Program, the City of South Padre Island Transit Department, Island Metro, has developed a Title VI Program.

## ISLAND METRO TITLE VI PROGRAM

<b>Table of Contents:</b>	<b>Page 1</b>
<b>Title VI Notice to the Public</b>	<b>Page 2- 4</b>
<b>Title VI Complaint Procedure</b>	<b>Page 5- 6</b>
<b>Title VI Complaint Form</b>	<b>Page 7- 10</b>
<b>List of Transit-Related Title VI Investigations, Complaints, &amp; Lawsuits</b>	<b>Page 11</b>
<b>Public Participation Plan</b>	<b>Page 12</b>
<b>Public Meeting Notice Flyer</b>	<b>Page 13</b>
<b>Title VI and Limited English Proficiency Technical Assistance Resources</b>	<b>Page 14- 15</b>
<b>Membership of Non-elected Committees and Councils</b>	<b>Page 20</b>
<b>Title VI Equity Analysis</b>	<b>Page 20</b>
<b>Title VI City Council Resolution</b>	<b>Page 20</b>
<b>Service Standards</b>	<b>Page 21</b>
<b>Service Policies</b>	<b>Page 22</b>
<b>Attachment A: Title VI LEP Plan</b>	<b>Page 23-45</b>
<b>Attachment B: Equity Analysis Exemption Email</b>	<b>Page 46-48</b>

### **Introduction**

The City of South Padre Island's Transit Department, Island Metro, provides fixed-flex public transportation service for South Padre Island, Port Isabel, and Laguna Heights in Cameron County, Texas. The Transit Department has 26 employees and operates 8 service vehicles.

## **Title VI Notice to the Public**

The following **Notice to the Public** of Island Metro's Title VI Program is posted at the following locations:

- Island Metro Administrative Offices, Reception Desk
- Island Metro Bus Garage/Drivers Break Room and Bus Storage
- All Island Metro Buses
- Island Metro web page on the City of South Padre Island's website:  
<http://www.myspi.org/department/division.php?structureid=178>
- Island Metro Facebook page <https://www.facebook.com/SPIPublicTransit>
- Public Meeting Rooms

**Title VI of the Civil Rights Act of 1964** states “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.”

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If you believe you have been discriminated against due to **race/color, national origin, low income** , or **limited English proficiency** *by an Island Metro employee*, please obtain a Title VI Complaint Form or additional information on our website at [www.myspi.org](http://www.myspi.org), by calling 956-761-8179, or by visiting the Island Metro administrative office at 321 Padre Blvd. South Padre Island, TX 78597.

Complaints may also be submitted to the following:

Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483;

Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, TX 7612;

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

If you need information in another language, please contact us at  
956-761-8179.

Si necesita información en otro idioma, entonces contactenos a  
956-761-8179.

**El Título VI de la Ley de Derechos Civiles de 1964** estipula "ninguna persona en los Estados Unidos será, por razón de **raza, color u origen nacional**, excluida de la participación en, negada los beneficios de o ser objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal."

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Si usted cree que usted ha sido discriminado por **raza/color, origen nacional, bajos ingresos o habilidad limitada en inglés** *por un empleado del Island Metro*, por favor, obtenga un formulario de queja de Título VI o información adicional en nuestro sitio web en [www.myspi.org](http://www.myspi.org), o llamando al 956-761-8179, o visitando la oficina administrativa del Island Metro ubicada en el 321 Padre Blvd. South Padre Island, TX 78597.

Las quejas también se pueden presentar a los siguientes:

Departamento de Transporte de Texas, Atención: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483;

Administración Federal de Tránsito, Región VI, 819 Taylor Street, Sala 8A36, Fort Worth, TX 7612;

Oficina de Derechos Civiles de la Administración Federal de Tránsito, Atención, Coordinador del Programa del Título VI, Edificio Este, 5.º Piso-TCR, 1200 New Jersey Ave.m SE, Washington DC 20590.

Si necesita información en otro idioma, entonces contactenos a  
956-761-8179.

If you need information in another language, please contact us at  
956-761-8179.

## **Title VI Complaint Procedure**

### **Island Metro Title VI Complaint Procedure**

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of South Padre Island transit system Island Metro (hereinafter referred to as Island Metro) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Island Metro investigates complaints received no more than 180 days after the alleged incident. Island Metro will process complaints that are complete.

Once the complaint is received, Island Metro will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by our office.

Island Metro has 10 days to investigate the complaint and notify the Public Transportation Coordinator of the complaint. If more information is needed to resolve the case, Island Metro may contact the complainant. The complainant has 10 business days from the date of the letter to send the requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, Island Metro can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590; or Texas Department of Transportation, Civil Rights Office, 125 E 11<sup>th</sup> Street, Austin, TX 7870-2409.

If you need information in another language, please contact us at 956-761-8179.

Si necesita información en otro idioma, entonces contactenos a 956-761-8179.

### **El procedimiento de queja VI título onda**

Cualquier persona que cree que él o ella ha sido discriminado en base a raza, color u origen nacional por el sistema de tránsito de la ciudad South Padre Island la ola (en lo sucesivo la ola) puede presentar una queja de título VI rellenando y enviando el formulario de denuncia de la Agencia título VI. La ola investiga denuncias recibidas a más tardar 180 días después del supuesto incidente. La ola procesará las quejas que están completas.

Una vez recibida la denuncia, la ola revisaremos para determinar si nuestra oficina tiene jurisdicción. El querellante recibirán una carta de reconocimiento le informa si la queja será investigada por nuestra oficina.

Island Metro tiene 10 días para investigar una queja y notificar al Coordinador de Transporte Público de la queja. Si necesita más información para resolver el caso, la ola puede comunicarse con el demandante. El querellante tiene 10 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso. . Si el investigador no es contactado por el querellante o no recibir la información adicional dentro de 10 días hábiles, la ola administrativamente puede cerrar el caso. Un caso puede ser cerrado administrativamente también si el demandante ya no desea seguir su caso.

Después de que el investigador comentarios sobre la queja, él/ella emitirá uno de dos cartas al demandante: una carta de cierre o una carta de encontrar (LOF). Una carta de cierre resume las acusaciones y afirma que no hubo una violación del título VI y que el caso será cerrado. Un LOF resume las denuncias y las entrevistas sobre el presunto incidente y explica si cualquier acción disciplinaria, entrenamiento adicional de la funcionaria, u otra acción ocurrirá. Si el demandante desea apelar la decisión, él/ella tiene 10 días después de la fecha de la carta o el LOF para hacerlo.

Una persona también puede presentar una queja directamente ante la Administración Federal de tránsito, en FTA oficina de derechos civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

Si necesita información en otro idioma, entonces contactenos a 956-761-8179.

If you need information in another language, please contact us at 956-761-8179.



## Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states, "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."

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to:

City of South Padre Island, Island Metro  
Title VI Officer  
321 Padre Blvd.  
South Padre Island, TX 78597

You can reach our office Monday-Friday from 8-5 at 956-761-8179, or you can email the Title VI Officer at [bperez@myspi.org](mailto:bperez@myspi.org).

1. Complainant's Name: \_\_\_\_\_
2. Address: \_\_\_\_\_
3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
4. Telephone No. (Home): \_\_\_\_\_ (Other): \_\_\_\_\_
5. Person discriminated against (if other than the complainant)  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
6. What was the discrimination based on? (Check all that apply)  
 Race  Color  National Origin  Low Income  Limited English Proficiency
7. Date of incident resulting in discrimination: \_\_\_\_\_
8. Describe how you were discriminated against. What happened and who was responsible?  
For additional space, attach additional sheets of paper or use the back of the form.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
9. What Island Metro representatives are the person(s) alleged to have been involved?  
\_\_\_\_\_

10. Where did the incident take place? Please provide the location, bus number, driver's name, etc.

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

Witnesses? Please provide their contact information.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Numbers: (Home) \_\_\_\_\_ (Other) \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Numbers: (Home) \_\_\_\_\_ (Other) \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Numbers: (Home) \_\_\_\_\_ (Other) \_\_\_\_\_

12. Did you file this complaint with another federal, state, or local agency? (Check the appropriate space)  Yes  No

If the answer is yes, check each agency complaint was filed with:

Federal Agency  State Agency  Local Agency  Other \_\_\_\_\_

13. Provide contact person information for the agency you also filed the complaint with:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Numbers: (Home) \_\_\_\_\_ (Other) \_\_\_\_\_

Date Filed: \_\_\_\_\_

**Sign the complaint in the space below. Attach any documents you believe support your complaint.**

\_\_\_\_\_

**Complainant's Signature**

\_\_\_\_\_

**Date**

If you need information in another language, please contact us at 956-761-8179.

Si necesita información en otro idioma, entonces contactenos a 956-761-8179.

## Título VI Forma de Denuncia

Título VI de la Civil rights Act de 1964 "ninguna persona en los Estados Unidos, por razón de raza, color u origen nacional, excluida de la participación en, ser negada los beneficios de o ser objeto de discriminación bajo cualquier programa o actividad recibiendo asistencia financiera federal.

Por favor proporcione la siguiente información necesaria para poder procesar su obediente. Asistencia está disponible a petición. Complete este formulario y correo o entregar:

La ciudad de South Padre Island, Island Metro  
Título VI Oficial  
321 Padre Blvd  
South Padre Island, TX 78597

Se puede llegar a nuestra oficina de lunes a viernes de 8 a 5 en el 956-761-8179, o usted puede enviar el Título VI Oficial en [bperez@myspi.org](mailto:bperez@myspi.org).

1. El nombre del denunciante: \_\_\_\_\_

2. Domicilio: \_\_\_\_\_

3. Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip código: \_\_\_\_\_

4. N° de teléfono (casa): \_\_\_\_\_ (otros): \_\_\_\_\_

5. Persona discriminada (si es distinto de querellante)

Nombre: \_\_\_\_\_

Domicilio: \_\_\_\_\_

Cuidad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip código: \_\_\_\_\_

6. ¿Cuál fue la discriminación basada en? (Marque todas las que apliquen)

Raza  Color  origen nacional  baja renta  limitado dominio del inglés

7. Fecha de incidente dando lugar a la discriminación: \_\_\_\_\_

8. Describe cómo fueron discriminados. ¿Lo que pasó y quién fue el responsable? Para espacio adicional, adjuntar hojas adicionales de papel o la parte posterior de la forma.

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

9. Qué representantes de Island Metro son las personas que se alega fueron involucrados?

\_\_\_\_\_

10. Donde tomó lugar el incidente. Por favor proporcione el autobús número, nombre del conductor, ubicación, etc.

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

---

¿Los testigos? Por favor proporcione su información de contacto.

Nombre: \_\_\_\_\_

Domicilio: \_\_\_\_\_

Cuidad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip código: \_\_\_\_\_

Teléfonos: (Casa) \_\_\_\_\_ (otros) \_\_\_\_\_

Nombre: \_\_\_\_\_

Domicilio: \_\_\_\_\_

Cuidad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip código: \_\_\_\_\_

Teléfonos: (Casa) \_\_\_\_\_ (otros) \_\_\_\_\_

Nombre: \_\_\_\_\_

Domicilio: \_\_\_\_\_

Cuidad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip código: \_\_\_\_\_

Teléfonos: (Casa) \_\_\_\_\_ (otros) \_\_\_\_\_

Nombre: \_\_\_\_\_

Domicilio: \_\_\_\_\_

Cuidad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip código: \_\_\_\_\_

Teléfonos: (Casa) \_\_\_\_\_ (otros) \_\_\_\_\_

12. ¿Has presentar esta queja con otra agencia federal, estatal o local?(Compruebe el espacio correspondiente) Si  No

Si la respuesta es Sí, compruebe que cada denuncia agencia con:

Agencia Federal para el  agencia estatal  Agencia Local  otros  \_\_\_\_\_

13. Proporciona información de persona de contacto para también presentó la queja con la Agencia:

Nombre: \_\_\_\_\_

Domicilio: \_\_\_\_\_

Cuidad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zip código: \_\_\_\_\_

Teléfonos: (Casa) \_\_\_\_\_ (otros) \_\_\_\_\_

Fecha: \_\_\_\_\_

**Firme la demanda en el espacio de abajo. Adjunte cualquier documento que crees que es compatible con su queja.**

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Firma del demandante

---

Fecha

Si necesita información en otro idioma, entonces contactenos a 956-761-8179.

If you need information in another language, please contact us at 956-761-8179.

**List of Investigations, Lawsuits and Complaints**

	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race, color, or national origin)</b>	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

As of September 15, 2023, no Title VI investigations, complaints, or lawsuits involving the City of South Padre Island Transit Department have been received.

## **Public Participation Plan**

At least once per year, Island Metro will schedule a public outreach meeting to gain input from its minority and limited English proficient populations, visitors, and the public at large. A survey will be available to assist in gaining valuable information. A summary of each meeting will be kept on file. The public at large, as well as visitors, are informed as non-EJ populations are through notices in the local newspaper and on our website, newsletter, and social media accounts.

In addition to an annual outreach meeting, Island Metro will contact community groups and agencies in the service area that also come into regular contact with minority and limited English proficient populations. A letter and survey for the agencies will be mailed out with the purpose of gaining helpful information.

Copies of the documents mentioned are below:



## City of South Padre Island Island Metro

*Help Us Plan for the Future of Transit!*

The City of South Padre Island Transit Department is conducting a study to enhance transit services in Port Isabel and South Padre Island. You can contribute to this effort by attending the public and stakeholder open-house discussion sessions listed below. You will also have the opportunity to learn more about transit operations in your community. Your feedback and suggestions will help direct future service improvements. We welcome you to stop by the sessions and share your thoughts.

- *What are your transportation needs?*
- *What opportunities for improved service are available?*
- *Learn how you can help support local public transit improvements.*

**Thursday, September 7, 2023**  
5:30 p.m. – 7:30 p.m.

**Island Metro Multimodal Facility**  
321 Padre Blvd | South Padre Island

**Friday, September 8, 2023**  
5:30 p.m. – 7:30 p.m.

**Port Isabel City Hall**  
305 E Maxan St, | Port Isabel



## City of South Padre Island Island Metro

*¡Ayúdenos a planificar el futuro del tránsito!*

El Departamento de Transportacion de la Ciudad de La Isla del Padre Sur está realizando un estudio para mejorar los servicios de transporte público en Puerto Isabel y La Isla del Padre Sur. Usted podrá contribuir a este esfuerzo asistiendo a las sesiones de sugerencias que estarán abiertas al público las cuales están enlistadas a continuación. Usted también tendrá la oportunidad de obtener más información sobre las operaciones de transporte público en su comunidad. Sus comentarios y sugerencias ayudarán a dirigir futuras mejoras en el servicio. Los invitamos a asistir a las sesiones para compartir sus ideas:

- *¿Cuáles son sus necesidades de transporte?*
- *¿Qué oportunidades para mejorar el servicio están disponibles?*
- *Aprenda cómo poder ayudar a mejorar el transporte público local.*

**Jueves, 7 de Septiembre de 2023**  
5:30 p.m. – 7:30 p.m.

**Island Metro Multimodal Facility**  
321 Padre Blvd | South Padre Island

**Viernes, 8 de Septiembre de 2023**  
5:30 p.m. - 7:30 p.m.

**Port Isabel City Hall**  
305 E. Maxan St | Port Isabel

## LEP SURVEY/FOCUS GROUP QUESTIONS

Transit agencies are encouraged to consult directly with LEP persons to determine how frequently these persons use the agency's service and the importance of the service to LEP persons.

- Do you use public transportation? \_\_\_\_\_

If a person answers "yes," ask the following questions:

- How often do you use public transportation? \_\_\_\_\_
- What kinds of public transportation do you use—trains, buses, the city subway?  
\_\_\_\_\_
- When do you use public transportation? For what purpose?  
\_\_\_\_\_
- Are you satisfied with the transportation you use?  
\_\_\_\_\_
- Do you have any suggestions for how the people who run the transportation services could improve it to make it work better for you? Please be as specific as you can.  
\_\_\_\_\_  
\_\_\_\_\_

If a person answers "no" to the first question, ask the following questions:

- How do you travel if you have to go somewhere in your area? \_\_\_\_\_
- Would you use public transportation if the trains or buses were set up differently?  
\_\_\_\_\_
- If the person answers "yes" to this question, then ask:  
\_\_\_\_\_
- Which transit system would you use? \_\_\_\_\_
- How can the people who run that system improve it to make it work better for you?  
\_\_\_\_\_  
\_\_\_\_\_



## LEP ENCUESTA/PREGUNTAS

Agencias de transporte son alentadas a consultar directamente con las personas LEP para determinar con qué frecuencia estas personas utilizan el servicio de la agencia y la importancia del servicio a las personas LEP.

¿Usas transporte público? \_\_\_\_\_

Si una persona respuestas "Sí", haga las siguientes preguntas:

¿Con qué frecuencia utilizas transporte público? \_\_\_\_\_

¿Qué tipos de transporte público usas — trenes, autobuses, el metro de la ciudad.

\_\_\_\_\_

¿Cuándo utilizas transporte público? ¿Con qué propósito?

\_\_\_\_\_

¿Está satisfecho con el transporte que utilizas?

\_\_\_\_\_

¿Tienes alguna sugerencia ¿cómo podría mejorar la gente que dirige los servicios de transporte para hacer que funcione mejor para usted? Por favor sea tan específico como usted puede.

\_\_\_\_\_

Si una persona respuestas "no" a la primera pregunta, haga las siguientes preguntas:

¿Cómo usted viaja si tienes que ir a algún lugar en su zona?

\_\_\_\_\_

¿Usar transporte público si los trenes o autobuses instalaron diferentemente?

\_\_\_\_\_

Si la persona responde "Sí" a esta pregunta, entonces pregunto:

Que los sistemas de tránsito usarías?

\_\_\_\_\_

¿Cómo puede mejorar la gente que gobierna ese sistema para que funcione mejor para usted?

\_\_\_\_\_

### **Island Metro - Summary of Public Hearing**

**September 2023**

A public hearing was held at Island Metro's administrative offices at 321 Padre Blvd., South Padre Island, TX on September 07, 2023@ 5:30 p.m and September 08, 2023@5:30PM at the Port Isabel City Hall . These locations are generally convenient for persons affected by our services and is accessible to the elderly and/or persons with disabilities. Provisions were made to receive and accept written statements, exhibits, and oral statements. Translators were provided for non-English speaking persons (predominately Spanish in the service area).

### **Island Metro - Summary of Public Hearing**

**September 7, 2023**

A public hearing was held at the Island Metro's administrative offices at 321 Padre Blvd., South Padre Island, TX on September 7, 2023 at 5:30 p.m. This location is generally convenient for persons affected by our services and is accessible to the elderly and/or persons with disabilities. Provisions were made to receive and accept written statements, exhibits, and oral statements. Translators were provided for non-English speaking persons (predominately Spanish in the service area). Four persons from the general public attended the meeting. Main topics that were discussed were the possibility of extended service, and updating the current Island Metro brochure for better clarity and understanding to reduce confusion of the way the routes operate in the area. Island Metro, Limited Eglinsh Proficiency (LEP) Surveys and Customer Satisfaction Surveys were conducted.

### **Island Metro - Summary of Public Hearing**

**September 8, 2023**

A public hearing was held at the Port Isabel's City Hall administrative meeting area at 305 E Maxan St. Port Isabel, TX on September 8, 2023 at 5:30 p.m. This location is generally convenient for persons affected by our services and is accessible to the elderly and/or persons with disabilities. Provisions were made to receive and accept written statements, exhibits, and oral statements. Translators were provided for non-English speaking persons (predominately Spanish in the service area). No persons from the general public attended this meeting.

Dear Fellow Agencies,

The City of South Padre Island's Island Metro is fulfilling Title VI requirements as part of our grant application, and we are requesting some input from other agencies that work with Limited English Proficient (LEP) persons. This information will help us identify individuals who speak Spanish and other languages, where they reside, and how we can access them to provide information regarding public transportation. Under these regulations, Island Metro conducts an analysis backed with U.S. Census Maps to sustain our findings, and consequently, the Federal Transit Administration thoroughly reviews for approval/rejection of changes.

Please assist us with the attached questionnaire. In addition, we would like to conduct 2-3 meetings with LEP persons in the area to offer information about our public transportation services, whether they are aware of the types of language assistance our agency provides and which one works best, and what if any, additional language assistance measures would be most beneficial.

If your agency is interested in coordinating a meeting, please let me know as soon as possible to schedule a time. If you have any questions, please email me at [bperez@myspi.org](mailto:bperez@myspi.org) or Jesse Arriaga at [jarriaga@myspi.org](mailto:jarriaga@myspi.org) or call us at: (956) 761-8179.

Thank you,

Bartolo Perez III, Transit Manager  
Island Metro, City of South Padre Island

## QUESTIONS TO ASK COMMUNITY GROUPS SERVING LEP PERSONS

The DOT LEP Guidance states that the nature of language assistance an agency provides should be based in part on the number and proportion of LEP persons served by the recipient, the frequency of contact between the recipient and the LEP population, and the importance of the service provided by the recipient to the LEP population.

In order to better analyze these factors, transit agencies are encouraged to consult with community organizations serving LEP persons and ask some or all of the following questions:

- What geographic area does your agency serve? \_\_\_\_\_  
\_\_\_\_\_
- How many people does your agency provide services to? \_\_\_\_\_
- Has the size of the population you serve increased, stayed the same, or decreased over the past five years? \_\_\_\_\_
- What are the countries of origin from which your population has immigrated?  
\_\_\_\_\_
- Does your population come from an urban or rural background? \_\_\_\_\_
- What are the languages spoken by the population you serve? \_\_\_\_\_
- What is the age and gender of your population? \_\_\_\_\_
- What is the education and literacy level of the population you serve? \_\_\_\_\_  
\_\_\_\_\_
- What needs or expectations for public services has this population expressed? \_\_\_\_\_  
\_\_\_\_\_
- Has the population inquired about how to access public transportation or expressed a need for public transportation service? \_\_\_\_\_
- What are the most frequently traveled destinations? \_\_\_\_\_  
\_\_\_\_\_

- Are there locations that the population has expressed difficulty accessing via the public transportation system?

---

- Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members? \_\_\_\_\_

- What is the best way to obtain input from the population? \_\_\_\_\_

---

- Who would the population trust most in delivering language-appropriate messages? \_\_\_\_\_

---

### **Membership of Non-Elected Committees and Councils**

The agency does not have a non-elected board or advisory council. A municipality governs the agency.

### **Monitoring Sub-recipients,**

The agency does not have any sub-recipients.

### **Title VI and Limited English Proficiency Technical Assistance Resources**

See Attachment A: Island Metro Title VI LEP Plan

### **Title VI Equity Analysis**

Equity Analysis is not required as per Mark Sprick, AICP, Program Specialist, Public Transportation Division, Texas Department of Transportation. (See Attached Email Correspondence).

### **Title VI City Council Resolution**

Title VI Program was approved by the City of South Padre Island City Council on October 4, 2023.

## **TITLE VI SERVICE STANDARDS**

- 1. Vehicle Load Standards**
- 2. Vehicle headways Standards**
- 3. On-time Performance Standards**
- 4. Service Availability Standards**

### **Vehicle Load Standards**

<b>Vehicle Type</b>	<b>Average Passenger Capacities</b>				
	<u>Seated</u>	<u>Standing</u>	<u>Wheelchairs</u>	<u>Total</u>	<u>Maximum Load Factor</u>
Ford E450	19	11	2	30	1.6
Ford E650	31	19	2	40	1.9

### **Vehicle Headway Standards**

Vehicle headways for Routes 1, 2, & 4 are 30 minutes. Vehicle headways for Route 3 is 1 hour. Service frequency for Routes 1 & 2 is 2 buses per hour. Service frequency for Route 3 is 1 bus every hour. Service frequency for Route 4 is 1 bus every half hour.

Vehicle headways and service frequency are the same for peak and off-peak times. The only times these standards are jeopardized are during extreme tourism periods such as spring break, Holy Week, July 4<sup>th</sup>, and also Memorial Day and Labor Day weekends.

### **On-time Performance Standards**

Island Metro has established an on-time performance standard that prohibits vehicles from running early but may run up to 10 minutes late. Island Metro has several stops along its routes that have waiting/resting times that will allow buses to gain lost time.

Currently, Island Metro records and documents the level of on-time performance of our routes, and supervisors are monitoring system-wide on-time performance and making every effort to correct performance deviations as quickly as possible.

The agency plans to purchase a Computer Aided Dispatch (CAD) and Automatic Vehicle Location (AVL) fixed route bus transportation services system for all of its transit buses. It will enable the agency to monitor on-time performance. The agency's on-time performance objective is 95% or better.

### **Service Availability Standards**

In Port Isabel, bus stops are distributed so that residents in the service area are within 6 blocks of bus service. In South Padre Island, riders are allowed to "Island Metro," a bus down along the regular route, meaning residents in the service area are within 1 block of the bus service.

## **TITLE VI SERVICE POLICIES**

- **Vehicle Assignments**
- **Transit Amenities**

### **Vehicle Assignments**

Low-floor buses are deployed on high-ridership lines. During non-peak times they will be used on Route 3 (Laguna Heights). During spring break, they will be used on Route 4 (Padre Blvd) and Routes 1 & 2 (Port Isabel). All buses are equipped with air conditioning.

### **Transit Amenities**

Transit amenities along bus routes are dispersed regularly throughout the service area, based on loading/unloading demand, rider safety, and distance between shelters. The transit station is located centrally within the service area, while still being located within the City of South Padre Island.



ATTACHMENT A:

# City of South Padre Island Island Metro



## Limited English Proficiency Plan

Approved by:

City Council/October 4th, 2023

October 2023

## **LIMITED ENGLISH PROFICIENCY PLAN**

### **Table of Contents**

<b>Introduction</b>	<b>3</b>
<b>Executive Order 13166</b>	<b>3</b>
<b>Plan Summary</b>	<b>4</b>
<b>Four Factor Analysis</b>	<b>4-10</b>
<b>Limited English Proficiency Plan Outline</b>	<b>11-15</b>
<b>Languages Spoken at Home Chart</b>	<b>Appendix A</b>
<b>Distribution Map of LEP Persons in the Service Area</b>	<b>Appendix B</b>
<b>Island Metro Service Area Map</b>	<b>Appendix C</b>
<b>Community Partner Letter and Survey</b>	<b>Appendix D</b>
<b>LEP Survey/Focus Group Questions</b>	<b>Appendix E</b>

## Introduction

The purpose of this Limited English Proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to Limited English Proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights ACT of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

## Executive Order 13166

Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency.” (See 65 FR 50123, August 16, 2000, DOJ's General LEP Guidance). Different treatment based on a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the City of South Padre Island-Island Metro and governments, private and non-profit entities, and sub-recipients.

## Plan Summary

Island Metro has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Island Metro services as required by Executive Order 13166. A limited English Proficiency person is one who does not speak English as their primary language and who has limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining Island Metro's extent of obligation to provide LEP services, Island Metro undertook a U.S. Department of Transportation Four Factor LEP Analysis, which considers the following: 1) The number or proportion of LEP persons eligible in Island Metro's service area who may be served or likely to encounter an Island Metro program, activity, or service; 2) the frequency with which LEP individuals come in contact with Island Metro services; 3) the nature and importance of the program, activity or service provided by Island Metro to the LEP population; and 4) the resources available to Island Metro and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## Four-Factor Analysis

**FACTOR 1: The number or proportion of LEP persons eligible in Island Metro's service area who may be served or likely to encounter Island Metro service.**

### **Task 1, Step 1: Examine prior experiences with LEP individuals**

Island Metro has a general history of daily interaction with LEP individuals, almost exclusively with those who speak Spanish as a primary language. Since the service area is located in the southernmost region of Texas, the ethnicity of the population is primarily Hispanic. Contact with LEP persons is made on a daily basis on all routes and services with transit vehicle operators. Customer service calls are occasionally received in Spanish. Interaction or experience with languages other than Spanish has

been uncommon. Island Metro examined the US Census report from 2020 and determined that approximately 89.47% of the population is Hispanic or Latino. Also 72.2% of Island Metro’s service area age 5 and older speaks a language other than English.

**RACE IN SERVICE AREA**

County	Population	Hispanic or Latino Population	Percent Hispanic or Latino
Cameron County	421,017	376,680	89.47%

Source: U.S. Census Bureau, 2020 Census

**Task 1, Step 2: Become familiar with data from the U.S. Census**

U.S. Census data indicates that Spanish is spoken by the great majority of those speaking languages other than English. All other languages combined total approximately 1% of the total languages spoken.

**LANGUAGES SPOKEN IN SERVICE AREA**

County	Population Over 5 Years Old	Percent
<b>Cameron County</b>	<b>388,100</b>	<b>100%</b>
English Only	112,085	28.88%
Spanish or Spanish Creole	272,888	70.31%
Other Indo-European Languages	1,246	.32%
Asian & Pacific Island Languages	1,520	.39%
Other Languages	361	.09%

Source: U.S. Census Bureau, 2020 American Community Survey

**Task 1, Step 2A: Identify the geographic boundaries of the area that your agency serves.**

Island Metro provides public transportation in the cities of South Padre Island, Port Isabel, and Laguna Heights in Cameron County in the state of Texas. Rural service is

provided and connections with RGV Metro Express and Valley Metro transit systems are made at one of our stops in Port Isabel, Cameron County, Texas. The agency has accessed census data on the LEP population at the county level.

**Task 1, Step 2B: Obtain Census data on the LEP population in your service area**

Census data on LEP individuals is attached in Appendix A.

**Task 1, Step 2C: Analyze the data you have collected**

Based on the data collected (from Appendix A), we can determine the number and proportion of LEP persons in our service area as follows:

- Persons who speak English less than very well and are therefore defined as LEP persons is 112,085 or 28.88% of the population.
- Of the general population over 5 years of age (388,100) that speak a language other than English, most speak Spanish (272,888 or 70.31%); the rest combined speak non-Spanish languages (3,127 or .80%).

**Task 1, Step 2D: Identify any concentrations of LEP persons within your service area**

A map of the distribution of LEP persons in the service area is attached in Appendix B.

**Task 1, Step 3: Consult state and local sources of data**

Other sources of data, such as the Texas Department of Education and the Department of Labor are consistent with U.S. Census Bureau data.

Undocumented evidence from local organizations and daily contact with riders suggests that the proportion of LEP persons encountered is approximately the same as the Census indicates.

### **Task 1, Step 4: Community organizations that serve LEP persons**

There are numerous community organizations that serve LEP populations in the area. Island Metro's service area and ridership are heavily concentrated in a rural Colonia, Laguna Heights.

#### **Task 1, Step 4A: Identify community organizations.**

Island Metro generated a list of potential community partners by reviewing information in the local phone directory.

#### **Task 1, Step 4B: Contact relevant community organizations.**

Island Metro contacted the following agencies by sending a letter and survey questions to them that describe our mission, discusses our attempt to improve the language services it provides, and invites the organizations to partner with our agency:

- Port Isabel Community Center
- Point Isabel Independent School District
- Port Isabel WIC Clinic
- Housing Authority, City of Port Isabel
- Social Services, City of Port Isabel
- Texas Employment Commission

#### **Task 1, Step 4C: Obtain information**

Survey results have only been returned from Social Services, City of Port Isabel at this time. Island Metro will continue to reach out to community organizations and resend letters, make phone calls, and explore other means of contact with organizations that serve LEP populations. The feedback indicated that our language assistance service is adequate. When more results have been obtained, the information will be recorded here.

Island Metro also held public outreach meeting on September 7, 2023, and September 8, 2023, to engage minorities and limited English proficient populations. When results from all means of obtaining information have been gathered, suggestions for improving service to our transit riders will be recorded here.

Presently the agency makes changes and improvements to service based on information and suggestions from drivers and city officials that they have received from riders and other stakeholders.

**FACTOR 2: The frequency with which LEP individuals come in contact with an ISLAND METRO program, activity, or service.**

**Task 2, Step 1: Review the relevant programs, activities, and services you provide**

Island Metro provides deviated fixed and demand response service. LEP individuals come into contact with these services on a daily basis. They also frequently come into contact with the drivers, staff, printed materials such as schedules and maps, and the Island Metro website.

**Task 2, Step: Review information obtained from community organizations**

According to community surveys, transportation service is used and needed for employment, medical appointments, grocery shopping, and social service agencies. A very large percentage of LEP riders use the service for these reasons.

**Task 2, Step 3: Consult directly with LEP persons.**

Island Metro held a public outreach meeting in order to consult directly with LEP persons. A sample survey is attached (See Appendix E: LEP Survey/Focus Group Questions). Our drivers and staff have been more successful in consulting with LEP persons directly in a non-formal environment on a daily basis.

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

**Task 3, Step 1: Identify your agency's most critical services.**

Island Metro's most critical service is its **free** transportation to all riders, specifically to the area's low-income workforce. Another critical service is its extended hours of service and extended days of service for low-income workers who work non-traditional schedules in the tourism industry.



If language barriers prevented persons from benefiting from our services, the consequences would be loss of employment, and the absence of access to health and human services, medical appointments, and shopping for necessities.

**Task 3, Step 2: Review input from community organizations and LEP persons**

Input from community organizations and LEP individuals indicates that Spanish is the most commonly spoken language of those who are LEP persons and that the colonia, Laguna Heights, sees the highest concentrations of these persons. The information obtained demonstrates the importance of our bus service to LEP populations, particularly in the Laguna Heights area.

**FACTOR 4: The Resources Available to the Recipient and Costs**

**Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs**

Island Metro currently translates all transit-related public information into Spanish. This information includes:

- Public announcements
- Route and schedule information
- Public meeting notices
- Notices/posters/flyers on buses
- Most information on the agency’s website
- 

(All other information on the website can be translated through Google Translate.)

All Island Metro employees, with the exception of two staff members, are bilingual (English/Spanish). This means that 93% of Island Metro personnel are bilingual, and 100% of the drivers who encounter most of the contact with LEP persons are bilingual. All personnel who attend public events are bilingual. The staff members who are not bilingual can speak basic phrases and have been instructed to seek assistance in communicating with LEP persons from another bilingual staff member. The City of South Padre Island also employs a full-time information officer that is available to translate formal and informal documents from English to Spanish.

The cost of all of these language assistance measures are part of the daily operations of the agency and the City, and is fiscally marginal.

**Task 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access.**

Because Spanish is so common in the service area and a large percentage of the agency's employees speak Spanish, the thorough system that is already in place is more than adequate.

Additional or future LEP services will ensure that new technology and Intelligent Transportation System upgrades are provided in Spanish.

**Task 4, Step 3: Analyze your budget**

Island Metro is funded by federal and state grants and local match funds from the Cities of South Padre Island and Port Isabel. As stated previously, the cost of all of the current language assistance measures are part of the daily operations of the agency and the City, and are minimal. It is doubtful that LEP services will affect the budget significantly at any time.

**Task 4, Step 4: Consider cost-effective practices for providing language assistance.**

Current language assistance measures are already cost-effective and future practices should not vary significantly.

## **Language Assistance Plan**

After analyzing the four factors, Island Metro has developed the following Plan to meet the requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person 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 from the Federal Transit Administration.

### **Task 1: Identifying LEP individuals who need language assistance**

The four-factor analysis shows that of those LEP persons living in the service area, the majority speak Spanish and are located in rural areas, low-income areas, and colonias. Only about 1% of all persons in the service area speak a language other than Spanish. The frequency of contact with these LEP persons is constant, with all aspects of service requiring access to Spanish translation.

Island Metro has used the following ways to identify our agency's LEP individuals:

1. Identified the geographic boundaries of the agency's service area
2. Gathered census data on LEP populations in the agency's service area
3. Information gathered from community organizations that serve LEP persons
4. Information gathered from face-to-face meetings with LEP persons.
5. Information gathered from surveys of LEP persons
6. Information gathered from interviews with agency staff that typically come in contact with LEP persons.

### **Task 2: Language assistance measures**

Island Metro currently translates all transit-related public information into Spanish. This information includes:

- Public announcements
- Route and schedule information
- Public meeting notices
- Notices/posters/flyers on buses
- Most information on the agency's website

(All other information on the website can be translated through Google Translate.)

In addition, all Island Metro personnel, with the exception of two staff, are bilingual (English/Spanish). This means that 93% of the personnel are bilingual, and 100% of the drivers who encounter most of the contact with LEP persons are bilingual. The staff members who do not speak Spanish have been instructed to seek assistance from bilingual staff when taking calls if they do not understand or cannot communicate with a caller. In case a language other than Spanish or English is communicated, staff is instructed to gather as much information as is possible to determine the language. In practice, this has never occurred.

The City of South Padre Island also employs a full-time information officer that is available to translate formal and informal documents from English to Spanish.

### **Task 3: Training staff**

All of Island Metro drivers are likely to come into contact with LEP persons on a daily basis. They are all preferred to be bilingual as part of their job duties. Because most of the employees are bilingual, training regarding language instruction is minimal. Those staff members who are not bilingual are trained to refer questions that are unintelligible to a bilingual staff member on duty.

#### **Task 3, Step 1: Identify agency staff that are likely to come into contact with LEP persons as well as management staff.**

All of Island Metro drivers are likely to come into contact with LEP persons on a daily basis. All other Island Metro staff, including management, are likely to come into contact with LEP persons regularly. In addition, the City employs a full-time information officer that can translate both orally and in written form and is bilingual.

#### **Task 3, Step 2: Identify existing staff training opportunities.**

Because 100% of the drivers are bilingual, training for them is unnecessary. The staff members who are not bilingual can speak basic phrases and have been instructed to seek assistance in communicating with LEP persons from another bilingual staff member. Existing and new employees who are not bilingual will take part in re-training and have available basic phrases to keep up to date on their responsibilities to LEP persons.

#### **Task 3, Step 3: Design and implement LEP training for agency staff.**

LEP training will be incorporated in staff training sessions if/when necessary in order to ensure compliance with all applicable regulations. This training will include the following:

- An overview of Title VI and LEP requirements
- How to address non-Spanish languages
- Providing superior customer service to LEP persons.

#### **Task 4: Providing notice to LEP persons.**

##### **Task 4, Step 1: Inventory the existing public service announcements and community outreach the agency currently performs.**

Island Metro provides the Title VI Notice to the Public and information concerning upcoming Public Participation Plans in the following ways:

- Signs, schedules, and maps in buses and at the administration offices
- Local newspapers, radio, and television advertisements
- Press releases
- Announcements and community meetings
- Website

These tools are used to target both riders who use the system and the public at large who may not know about the system.

##### **Task 4, Step 2: Incorporate notice of the availability of language assistance into existing outreach methods.**

Island Metro publicizes its availability of language assistance in Spanish continually using flyers, newspaper announcements, the website, and in Public Outreach notices.

##### **Task 4, Step 3: Conduct targeting community outreach to LEP populations.**

The agency targets LEP populations through its community outreach announcements. The agency also works to partner with existing community contacts and agencies that are in daily contact with LEP populations. The agency encourages engagement from minority and limited English-proficient populations.

Island Metro combines a variety of methods to communicate with transit users, including route schedules, a website, bilingual staff, and advertisements. Outreach will continue in English and Spanish as is currently done.

## **Task 5: Monitoring and updating the LEP Plan**

### **Task 5, Step 1: Establish a process to obtain feedback on your agency's language assistance measures**

Public notice will be given about Island Metro's LEP program through flyers and posters on buses and in local newspapers. Island Metro also mails surveys out to community LEP service groups and organizations. Any communication received in response to those notices will be addressed by Island Metro's staff.

### **Task 5, Step 2: Obtain feedback from community members and from agency staff**

Any feedback received from community partners will be used to develop LEP needs assessment. The information will be used to determine if language assistance measures are working and if changes need to be made.

The agency will also meet with staff, particularly with bus drivers, who are in constant contact with LEP persons to determine whether the assistance measures are effective.

### **Task 5, Step 3: Conduct internal monitoring**

Island Metro will conduct internal monitoring of its system to determine whether the current language assistance measures and staff training programs are working. Island Metro will also work with bilingual community members to determine if employees are responding appropriately to requests made with limited English or in Spanish.

### **Task 5, Step 4: Make changes to the language assistance plan based on feedback received.**

Changes will be made according to feedback received from riders, other agencies, community partners, and the agency's employees.

**Task 5, Step 5: Consider new language assistance needs when expanding service.**

Language assistance needs will be taken into account when expanding service. Activities will include:

- Continuing to provide all notices in both English and Spanish
- Creating draft printed materials that are subject to review in Spanish
- Ensuring that staff members who conduct about service changes are knowledgeable in key technical terms and jargon.

The agency will also make changes to its language assistance program as it introduces new technologies to the system.

**Dissemination of the ACT Limited English Proficiency Plan**

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to the Island Metro Title VI Coordinator.

Island Metro Title VI Coordinator  
Bartolo Perez III  
321 Padre Blvd  
South Padre Island, TX 78597  
Phone: 956-761-8179  
Email: [bperez@myspi.org](mailto:bperez@myspi.org)

Appendix A: Island Metro Languages Spoken at Home Chart: Ref.2020 Census

LANGUAGE SPOKEN AT HOME		United States <sup>™</sup> <b>Census</b> Bureau
<b>Note:</b> The table shown may have been modified by user selections. Some information may be missing.		
<b>DATA NOTES</b>		
TABLE ID:	S1601	
SURVEY/PROGRAM:	American Community Survey	
VINTAGE:	2020	
DATASET:	ACSST5Y2020	
PRODUCT:	ACS 5-Year Estimates Subject Tables	
UNIVERSE:	None	
FTP URL:	None	
API URL:	<a href="https://api.census.gov/data/2020/acs/acs5/subject">https://api.census.gov/data/2020/acs/acs5/subject</a>	
<b>USER SELECTIONS</b>		
GEOS	Cameron County, Texas	
EXCLUDED COLUMNS	None	
APPLIED FILTERS	None	
APPLIED SORTS	None	
<b>PIVOT &amp; GROUPING</b>		
PIVOT COLUMNS	None	
PIVOT MODE	Off	
ROW GROUPS	None	
VALUE COLUMNS	None	
WEB ADDRESS	<a href="https://data.census.gov/table?tid=ACSST5Y2020.S1601&amp;g=050XX00U548061">https://data.census.gov/table?tid=ACSST5Y2020.S1601&amp;g=050XX00U548061</a>	
TABLE NOTES	<p>Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, for 2020, the 2020 Census provides the official counts of the population and housing units for the nation, states, counties, cities, and towns. For 2016 to 2019, the Population Estimates Program provides estimates of the population for the nation, states, counties, cities, and towns and intercensal housing unit estimates for the nation, states, and counties.</p> <p>Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section.</p> <p>Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.</p> <p>Source: U.S. Census Bureau, 2016–2020 American Community Survey 5-Year Estimates</p> <p>Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling error is not represented in these tables.</p> <p>The 2016–2020 American Community Survey (ACS) data generally reflect the September 2018 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances, the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineation lists due to differences in the effective dates of the geographic entities.</p> <p>Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.</p> <p>Explanation of Symbols:- The estimate could not be computed because there were an insufficient number of sample observations. For a ratio of medians estimate, one or both of the median estimates falls in the lowest interval or highest interval of an open-ended distribution.N The estimate or margin of error cannot be displayed because there were an insufficient number of sample cases in the selected geographic area. (X) The estimate or margin of error is not applicable or not available.median- The median falls in the lowest interval of an open-ended distribution (for example "2,500-")median+ The median falls in the highest interval of an open-ended distribution (for example "250,000+").** The margin of error could not be computed because there were an insufficient number of sample observations.*** The margin of error could not be computed because the median falls in the lowest interval or highest interval of an open-ended distribution.***** A margin of error is not appropriate because the corresponding estimate is controlled to an independent population or housing estimate. Effectively, the corresponding estimate has no sampling error and the margin of error may be treated as zero.</p>	
COLUMN NOTES	None	

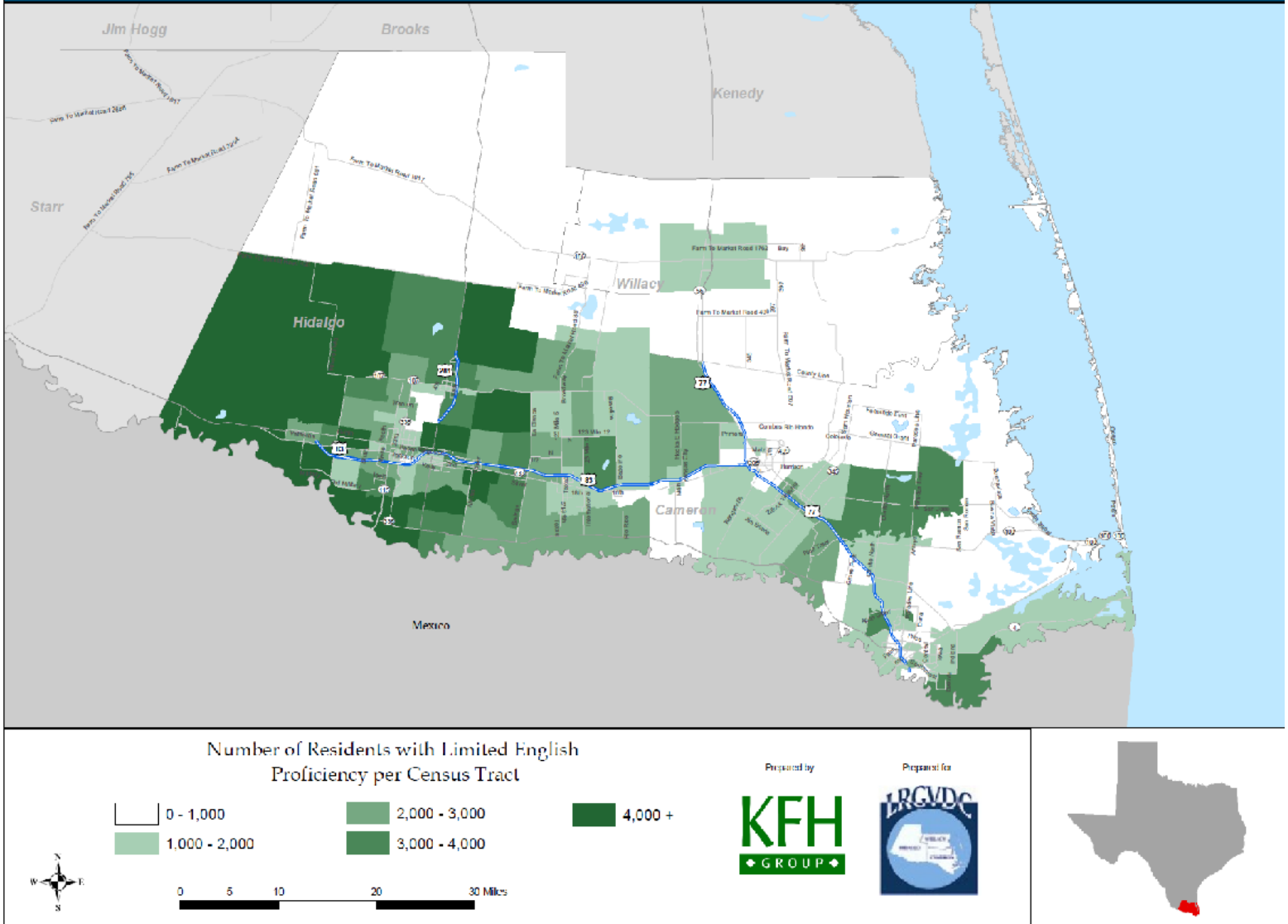


Cameron County, Texas											
	Total		Percent		Percent of specified language speakers						
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	
Population 5 years and over	388,100	±78	(X)	(X)	295,788	±2,951	76.2%	±0.8	92,312	±2,942	
Speak only English	112,085	±4,069	28.9%	±1.0	(X)	(X)	(X)	(X)	(X)	(X)	
Speak a language other than English	276,015	±4,058	71.1%	±1.0	183,703	±3,372	66.6%	±0.9	92,312	±2,942	
SPEAK A LANGUAGE OTHER THAN ENGLISH											
Spanish	272,888	±4,055	70.3%	±1.0	181,550	±3,365	66.5%	±0.9	91,338	±2,896	
5 to 17 years old	57,532	±2,063	14.8%	±0.5	49,033	±2,040	85.2%	±1.5	8,499	±909	
18 to 64 years old	176,733	±2,428	45.5%	±0.6	117,377	±2,351	66.4%	±1.1	59,356	±2,154	
65 years old and over	38,623	±833	10.0%	±0.2	15,140	±837	39.2%	±2.2	23,483	±1,073	
Other Indo-European languages	1,246	±327	0.3%	±0.1	1,064	±293	85.4%	±9.1	182	±124	
5 to 17 years old	194	±121	0.0%	±0.1	194	±121	100.0%	±20.5	0	±33	
18 to 64 years old	626	±203	0.2%	±0.1	490	±173	78.3%	±16.7	136	±121	
65 years old and over	426	±186	0.1%	±0.1	380	±187	89.2%	±8.7	46	±31	
Asian and Pacific Island languages	1,520	±242	0.4%	±0.1	747	±207	49.1%	±11.5	773	±217	
5 to 17 years old	61	±58	0.0%	±0.1	45	±49	73.8%	±38.6	16	±27	
18 to 64 years old	1,180	±239	0.3%	±0.1	612	±214	51.9%	±13.7	568	±187	
65 years old and over	279	±62	0.1%	±0.1	90	±59	32.3%	±22.0	189	±83	
Other languages	361	±255	0.1%	±0.1	342	±253	94.7%	±9.1	19	±27	
5 to 17 years old	124	±161	0.0%	±0.1	105	±158	84.7%	±37.6	19	±27	
18 to 64 years old	218	±148	0.1%	±0.1	218	±148	100.0%	±18.5	0	±33	
65 years old and over	19	±31	0.0%	±0.1	19	±31	100.0%	±80.1	0	±33	
CITIZENS 18 YEARS AND OVER											
All citizens 18 years old and over	236,106	±2,395	(X)	(X)	194,485	±2,848	82.4%	±0.8	41,621	±1,853	
Speak only English	72,212	±2,460	30.6%	±1.0	(X)	(X)	(X)	(X)	(X)	(X)	
Speak a language other than English	163,894	±2,885	69.4%	±1.0	122,273	±2,623	74.6%	±1.0	41,621	±1,853	
Spanish	162,184	±2,853	68.7%	±1.0	120,984	±2,592	74.6%	±1.0	41,200	±1,830	
Other languages	1,710	±256	0.7%	±0.1	1,289	±255	75.4%	±9.7	421	±176	

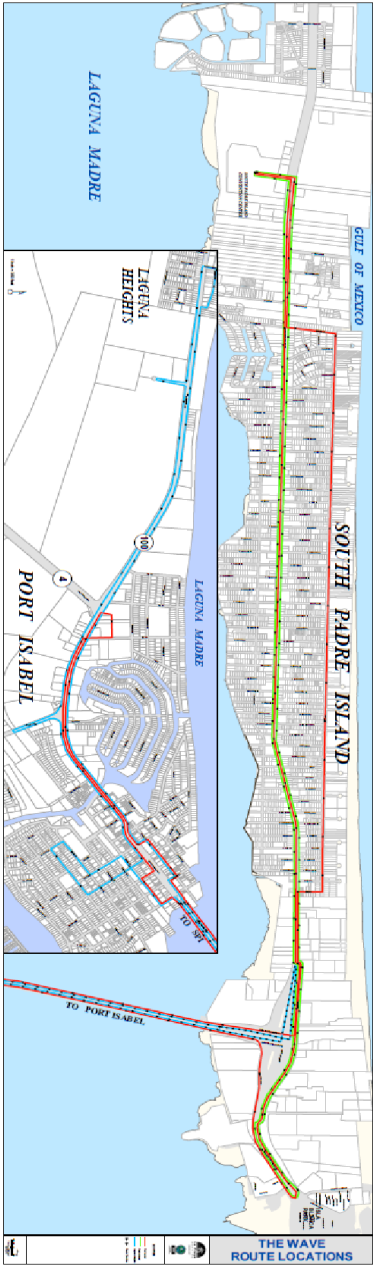
	Percent speak English less than "very well"	
Label	Estimate	Margin of Error
Population 5 years and over	23.8%	±0.8
Speak only English	(X)	(X)
Speak a language other than English	33.4%	±0.9
SPEAK A LANGUAGE OTHER THAN ENGLISH		
Spanish	33.5%	±0.9
5 to 17 years old	14.8%	±1.5
18 to 64 years old	33.6%	±1.1
65 years old and over	60.8%	±2.2
Other Indo-European languages	14.6%	±9.1
5 to 17 years old	0.0%	±20.5
18 to 64 years old	21.7%	±16.7
65 years old and over	10.8%	±8.7
Asian and Pacific Island languages	50.9%	±11.5
5 to 17 years old	26.2%	±38.6
18 to 64 years old	48.1%	±13.7
65 years old and over	67.7%	±22.0
Other languages	5.3%	±9.1
5 to 17 years old	15.3%	±37.6
18 to 64 years old	0.0%	±18.5
65 years old and over	0.0%	±80.1
CITIZENS 18 YEARS AND OVER		
All citizens 18 years old and over	17.6%	±0.8
Speak only English	(X)	(X)
Speak a language other than English	25.4%	±1.0
Spanish	25.4%	±1.0
Other languages	24.6%	±9.7

# Appendix B: Island Metro LEP Persons Distribution Map

**FIGURE 3-5:  
LOWER RIO GRANDE VALLEY REGIONAL PUBLIC TRANSPORTATION COORDINATION PLAN  
NUMBER OF RESIDENTS WITH LIMITED ENGLISH PROFICIENCY**



# Appendix C: Island Metro Service Area Map



## Appendix D: Community Partner Letter and Survey

July 17, 2023,

Dear Fellow Agencies,

The City of South Padre Island's Island Metro is fulfilling Title VI requirements as part of our grant application, and we are requesting some input from other agencies that work with Limited English Proficient (LEP) persons. This information will help us identify individuals who speak Spanish and other languages, where they reside, and how we can access them to provide information regarding public transportation. Under these regulations, Island Metro conducts an analysis backed with U.S. Census Maps to sustain our findings, and consequently, the Federal Transit Administration thoroughly reviews for approval/rejection of changes.

Please assist us with the attached questionnaire. In addition, we would like to conduct 2-3 meetings with LEP persons in the area to offer information about our public transportation services, whether they are aware of the types of language assistance our agency provides and which one works best, and what if any, additional language assistance measures would be most beneficial.

If your agency is interested in coordinating a meeting, please let me know as soon as possible to schedule a time. If you have any questions, please email me at [bperez@myspi.org](mailto:bperez@myspi.org) or Jesse Arriaga at [jarriaga@myspi.org](mailto:jarriaga@myspi.org) or call us at: (956) 761-8179.

Thank you,

Bartolo Perez III, Transit Manager  
Island Metro, City of South Padre Island

## LEP Survey/Focus Group Questions: Appendix E:

### QUESTIONS TO ASK COMMUNITY GROUPS SERVING LEP PERSONS

The DOT LEP Guidance states that the nature of language assistance an agency provides should be based in part on the number and proportion of LEP persons served by the recipient, the frequency of contact between the recipient and the LEP population, and the importance of the service provided by the recipient to the LEP population.

In order to better analyze these factors, transit agencies are encouraged to consult with community organizations serving LEP persons and ask some or all of the following questions:

- What geographic area does your agency serve? \_\_\_\_\_  
\_\_\_\_\_
- How many people does your agency provide services to? \_\_\_\_\_
- Has the size of the population you serve increased, stayed the same, or decreased over the past five years? \_\_\_\_\_
- What are the countries of origin from which your population has immigrated?  
\_\_\_\_\_
- Does your population come from an urban or rural background? \_\_\_\_\_
- What are the languages spoken by the population you serve? \_\_\_\_\_
- What is the age and gender of your population? \_\_\_\_\_
- What is the education and literacy level of the population you serve? \_\_\_\_\_  
\_\_\_\_\_
- What needs or expectations for public services has this population expressed? \_\_\_\_\_  
\_\_\_\_\_
- Has the population inquired about how to access public transportation or expressed a need for public transportation service? \_\_\_\_\_
- What are the most frequently traveled destinations? \_\_\_\_\_

- 
- Are there locations that the population has expressed difficulty accessing via the public transportation system?
- 

- Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members? \_\_\_\_\_

- What is the best way to obtain input from the population? \_\_\_\_\_
- 

- Who would the population trust most in delivering language-appropriate messages? \_\_\_\_\_
- 

### LEP SURVEY/FOCUS GROUP QUESTIONS

Transit agencies are encouraged to consult directly with LEP persons to determine how frequently these persons use the agency's service and the importance of the service to LEP persons.

- Do you use public transportation? \_\_\_\_\_

If a person answers "yes," ask the following questions:

- How often do you use public transportation? \_\_\_\_\_

- What kinds of public transportation do you use—trains, buses, the city subway?

- 
- When do you use public transportation? For what purpose?

- 
- Are you satisfied with the transportation you use?

- 
- Do you have any suggestions on how the people who run the transportation services could improve it to make it work better for you? Please be as specific as you can.
- 

If a person answers "no" to the first question, ask the following questions:

- How do you travel if you have to go somewhere in your area? \_\_\_\_\_

- Would you use public transportation if the trains or buses were set up differently?

---

If the person answers “yes,” to this question, then ask:

- Which transit systems would you use? \_\_\_\_\_
- How can the people who run that system improve it to make it work better for you?

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## Attachment B: Equity Analysis Exemption Email

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### Deborah Carpenter

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**From:** Graciela Cantu <Graciela.Cantu@txdot.gov>  
**Sent:** Friday, November 07, 2014 8:50 AM  
**To:** Deborah Carpenter  
**Cc:** Jesse Arriaga; Irma Flores  
**Subject:** FW: The WAVE Multi-Modal Project - City of South Padre Island

Good Morning Debbie, per Mark Sprick from our Headquarters Office, you will not need to address the equity analysis for the facility as part of your Title VI Plan.

Let me know if you have any questions.

---

**From:** Mark Sprick  
**Sent:** Friday, November 07, 2014 7:35 AM  
**To:** Graciela Cantu  
**Subject:** RE: The WAVE Multi-Modal Project - City of South Padre Island

Gracie,

If FTA approved the environmental review without the equity analysis, then as far as I'm concerned it's approved. It's their requirement. They should proceed with the construction.

Mark

---

**From:** Graciela Cantu  
**Sent:** Thursday, November 06, 2014 4:30 PM  
**To:** Mark Sprick  
**Subject:** RE: The WAVE Multi-Modal Project - City of South Padre Island

Mark, I don't see where an equity analysis was performed (see attached). As you can tell by the time the final document was submitted to FTA there was no PTN 135.

The original document was submitted to TxDOT on April 5, 2012 which initiated the review by the local Environmental Coordinator and ENV and the document was submitted to FTA until August 8, 2013 and project was cleared by FTA on October 22, 2013.

Let me know what's next.....thanks!

---

**From:** Mark Sprick  
**Sent:** Thursday, November 06, 2014 8:33 AM  
**To:** Graciela Cantu  
**Subject:** RE: The WAVE Multi-Modal Project - City of South Padre Island

Gracie,

Did FTA approve their environmental documents without the Title VI equity analysis?

Mark



---

**From:** Graciela Cantu  
**Sent:** Friday, October 24, 2014 3:48 PM  
**To:** Mark Sprick  
**Subject:** RE: The WAVE Multi-Modal Project - City of South Padre Island

Michael Chavez from the Project Delivery Section of ENV Division submitted the document to Lynn Hayes at FTA on August 8, 2013.

---

**From:** Mark Sprick  
**Sent:** Friday, October 24, 2014 3:16 PM  
**To:** Graciela Cantu  
**Subject:** RE: The WAVE Multi-Modal Project - City of South Padre Island

Gracie,

When did they submit their environmental documents for approval?

Mark

---

**From:** Graciela Cantu  
**Sent:** Friday, October 24, 2014 3:14 PM  
**To:** Mark Sprick  
**Subject:** FW: The WAVE Multi-Modal Project - City of South Padre Island

October 22, 2013.... ☹

---

**From:** Graciela Cantu  
**Sent:** Tuesday, October 22, 2013 2:21 PM  
**To:** Robin Gelston  
**Cc:** Jesse Arriaga ([JArriaga@MySPI.org](mailto:JArriaga@MySPI.org)); [DCarpenter@MySPI.org](mailto:DCarpenter@MySPI.org); Linda Gonzalez  
**Subject:** RE: The WAVE Multi-Modal Project - City of South Padre Island

Thank you! Congrats Jesse & Debbie!

---

**From:** Robin Gelston  
**Sent:** Tuesday, October 22, 2013 2:05 PM  
**To:** Graciela Cantu; Deborah Carpenter ([DCarpenter@MySPI.org](mailto:DCarpenter@MySPI.org))  
**Cc:** Homer Bazan; Norma Garza  
**Subject:** FW: The WAVE Multi-Modal Project - City of South Padre Island  
**Importance:** High

Gracie, Deborah

FTA has cleared the Wave Multi modal project!!!! See email below.

Robin Gelston  
Pharr District  
Environmental Coordinator  
956-702-6130  
956-279-4978 cell  
[Robin.Gelston@txdot.gov](mailto:Robin.Gelston@txdot.gov)

---

**From:** Michael Chavez  
**Sent:** Tuesday, October 22, 2013 2:02 PM  
**To:** Robin Gelston  
**Subject:** FW: The WAVE Multi-Modal Project - City of South Padre Island

FYI, Guess this is official notice.

Mike Chavez  
Project Delivery  
Austin  
Ext. 2514

---

**From:** [Lynn.Hayes@dot.gov](mailto:Lynn.Hayes@dot.gov) [<mailto:Lynn.Hayes@dot.gov>]  
**Sent:** Tuesday, October 22, 2013 1:59 PM  
**To:** Michael Chavez  
**Subject:** RE: The WAVE Multi-Modal Project - City of South Padre Island

Hello,

The project qualifies for a CE Categorical exclusion ( C)(9) Assembly or construction of facilities that is consistent with existing land use and zoning requirements. Please reference the date of this email in the grant. No further correspondence is necessary. Thank you, Lynn

---

This is Mike Chavez from TxDOT. We met at the FTA seminar last month. I am unsure of the protocol on this but I was hoping to check on the status of a CE that we sent your way last month? It was for the WAVE Multi-Modal Project by the City of South Padre Island in Cameron County. I have attached my cover letter for reference.

Thanks and have a great weekend,

**Michael R Chavez**  
Project Delivery Manager  
Environmental Affairs Division  
Texas Department of Transportation  
512-416-2514  
[Mike.Chavez@txdot.gov](mailto:Mike.Chavez@txdot.gov)

Drunk drivers wreck cars. And lives.

