

2025



**CITY OF EL PASO
TITLE VI NON-DISCRIMINATION PLAN**



Office of Title VI and ADA (Accessibility)

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Office of Title VI and ADA (Accessibility)

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Several other federal legal authorities supplement Title VI by extending protections based on age, sex, and disability. In addition, the Civil Rights Restoration Act of 1987 clarified Title VI enforcement by mandating that Title VI requirements apply to all programs and activities of federal-aid recipients regardless of whether any particular program or activity involves federal funds. Taken together, these laws require recipients and subrecipients of federal funds to ensure all programs and services are delivered to the public without discrimination.

The City of El Paso, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964; 49 C.F.R. Part 21 (Department of Transportation Regulations for the Implementation of Title VI of the Civil Rights Act of 1964); 49 C.F.R. Part 21; and related statutes and regulations. The City of El Paso acknowledges it is subject to and will comply with Federal Highway Administration Title VI Assurances.

This plan explains how The City of El Paso incorporates the requirements of Title VI and related legal authorities into its operations. The plan will be used as a reference for City of El Paso and an informational resource for the public. The plan will be updated every three years or when a new City Manager is placed in office to reflect changes in Title VI compliance operations.

The objectives of the City of El Paso's Title VI plan are:

- To formally designate and maintain Title VI contacts;
- To assign roles and responsibilities for ensuring compliance; by monitoring, promoting, and directing the implementation of the Title VI/Nondiscrimination program, policy and implementation plan;
- To ensure that the City's compliance with Title VI includes compliance by the City's grantees, sub-recipients, and related entities;
- To ensure that all persons are able to receive the benefit of City programs, services, and activities;
- To ensure that all persons including those with Limited English Proficiency (LEP) are provided meaningful access to City programs, services and activities.
- To avoid, minimize or mitigate disproportionate adverse environmental effects, including social and economic effects, on the City of El Paso's unique community and population as a result of City programs, services and activities.
- To establish clear procedures for filing, investigating, and successfully resolving grievances/complaints on a timely basis and at the lowest level possible.



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Discrimination under Title VI

It is the responsibility of every City of El Paso employee to prevent, minimize, and eradicate any form of discrimination. There are two types of discrimination prohibited under Title VI and its related statutes: (1) disparate treatment that alleges similarly situated persons are treated differently because of their race, color, or national origin (i.e., intentional discrimination); and (2) disparate impact/effects when a facially neutral policy, procedure, or practice results in different or inferior services or benefits to members of a protected group. The focus of disparate impact is on the consequences of a decision, policy, or practice rather than the intent.

Prohibited forms of discrimination may include, but not be limited to, the following:

- The denial of services, financial aid, or other benefits provided under a program;
- Distinctions in the quality, quantity, or manner in which a benefit is provided;
- Segregation or separation of persons in any part of the program;
- Restriction in the enjoyment of any advantages, privileges, or other benefits provided to others;
- Differing standards or requirements for participation;
- Methods of administration that directly or indirectly, or through contractual relationships would defeat or impair the accomplishment of effective nondiscrimination; or
- Discrimination in any activities or services related to a highway, infrastructure or facility built or repaired in whole or in part with federal funds.

The City of El Paso efforts to prevent such discrimination must address, but not be limited to, how a program or activity:

- Impacts the public;
- Provides accessibility;
- Provides equal access to benefits;
- Encourages participation;
- Provides services equitably;
- Initiates contracting and training opportunities;
- Investigates complaints;
- Allocates funding; and
- Prioritizes projects.



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Authorities

The authorities applicable to the City's Title VI/Nondiscrimination program are listed in Attachment 1 and may be found at <https://www.elpasotexas.gov/ada/title-vi>

The authorities include:

- **Title VI of the Civil Rights Act of 1964** (42 U.S.C. §2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- **49 CFR Part 21** (entitled *Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of The Civil Rights Act of 1964*);
- **23 CFR Part 200** (FHWA's Title VI/Nondiscrimination Regulation);
- **28 CFR Part 50.3** (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964); and,
- **Texas Administrative Code §9.4**, Civil Rights - Title VI Compliance

Nondiscrimination Policy Statement

It is the policy of the City of El Paso 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 in any operation of the City of El Paso as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of City of El Paso including its contractors and anyone who acts on behalf of City of El Paso. This policy also applies to the operations of any department or agency to which the City of El Paso extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

The nondiscrimination statement signed by the City Manager is located in Attachment 2 and may be found at <https://www.elpasotexas.gov/ada/title-vi>



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Standard DOT Title VI Assurances

The U.S. DOT requires that federal financial assistance be provided on the condition that the recipient provides an assurance that its programs and activities will be conducted in compliance with Title VI of the Civil Rights Act of 1964. The requirement is located at 49 CFR 21.7(a). To support the implementation of this requirement, the U.S. DOT provided an assurances agreement in U.S. DOT Order 1050.2A that federal fund recipients and subrecipients must sign as a condition of receiving federal financial assistance.

The assurances agreement provides specific non-discrimination language, the City of El Paso is required to include in bid solicitations or requests for proposal, contracts, and real estate agreements. The City of El Paso is committed to ensuring the necessary language is used as prescribed in the assurance's agreement.

In accordance with this requirement, City of El Paso has signed the U.S. DOT Standard Title VI/Non-Discrimination Assurances. The signed document is attached as Attachment 3 and may be found at <https://www.elpasotexas.gov/ada/title-vi>

Organization and Staffing

The City Manager is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 C.F.R. Part 200 and 49 C.F.R. Part 21.

The City of El Paso has assigned the Title VI Compliance Coordinator, to perform the duties of the Title VI Coordinator and ensure implementation of the agency's Title VI program. The position of Title VI Compliance Coordinator is located within Department of Community and Human Development. The Title VI Coordinator has direct access to the City Manager's office to discuss and inform him/her of any event(s), or concerns and progress with Title VI related topics and requirements.

The Title VI Coordinator is responsible for:

- Maintaining and updating the Title VI plan on the agency's behalf;
- Ensuring relevant agency staff receive necessary Title VI training;
- Ensuring prompt processing of Title VI complaints and referral to Texas Department of Transportation;
- Developing procedures for the collection and analysis of statistical data;
- Developing a program to conduct Title VI reviews of program areas; and
- Developing Title VI information for dissemination internally and externally;



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Title VI Compliance Coordinator Contact Information:

Title VI Compliance Coordinator
Office of Title VI and ADA (Accessibility)
801 Texas Ave. 3rd Floor
El Paso, Texas 79901
Office (915) 212- 1692
TitleVIoffice@elpasotexas.gov

Title VI Compliance Specialist

The City of El Paso has assigned a Title VI Compliance Specialist, to assist in performing the duties of Title VI and ensuring implementation of the agency's Title VI program. The position of Title VI Compliance Specialist is located within Department of Community and Human Development. Under general direction, the Title VI Compliance Specialist supports the City's commitment to upholding Title VI of the Civil Rights Act of 1964 and related civil rights statutes.

The Title VI Specialist is responsible for:

- Maintaining and updating the Title VI plan on the agency's behalf;
- Facilitate necessary Title VI training and technical assistance to staff;
- Administer the complaint process for inquiries and allegations of Title VI violations;
- Lead data collection efforts and documentation under the direction of the Title VI Compliance Coordinator;
- Coordinate with City liaisons to ensure accurate Title VI reviews of program areas; and
- Assist in the internal and external dissemination of Title VI information;

Title VI Compliance Specialist Contact Information:

Title VI Compliance Specialist
Office of Title VI and ADA (Accessibility)
801 Texas Ave. 3rd Floor
El Paso, Texas 79901
Office (915) 212- 1677
TitleVIoffice@elpasotexas.gov

The organizational chart located at Attachment 4 depicts the main structure of the City of El Paso and where the Title VI responsibilities are assigned and may be found at <https://www.elpasotexas.gov/ada/title-vi>



Office of Title VI and ADA (Accessibility)

Primary Program Areas and Review Procedures

Coordination with City Departments will be crucial in carrying out the activities of Title VI. Each department who has either been designated as a Program Emphasis Area or a Federal Program Area will assign a Liaison to work with the Office of Title VI and ADA (Accessibility). Program Emphasis Areas (PEAs) have significant impacts on both the public and businesses. However, these areas do not receive federal funding. Federal Program Areas (FPAs) are departments who receive federal funding.

In addition to the annual review of special emphasis areas, the Title VI office will work with Federal Program Areas in performing annual Title VI/Nondiscrimination Program Process Reviews. These process reviews will focus on a specific federal program area segment.

Each Federal Program Area will be responsible for the following:

- Identify the processes that impact the public.
- Schedule reviews to cover all the identified processes within a 3-year period to ensure compliance with this plan.
- Develop and submit a report to the City's Office of Title VI and ADA (Accessibility)

The Title VI Compliance Coordinator will summarize the results for inclusion in the Title VI/Nondiscrimination Annual Work Plan & Accomplishment Report.

Federal program areas may also be identified for a more in-depth Title VI review based on several factors:

- The potential Title VI impacts of the program or activity.
- To follow up on Title VI related recommendations made during a previous review.
- To ensure nondiscrimination in a program or activity that has received Title VI complaints.

Deficiencies found during the internal monitoring process will be documented on a corrective action plan (CAP) by the department within a period not to exceed 30 calendar days.

The CAP will include:

- The deficiency
- Applicable laws, rules, regulations
- Actions to be taken by the coordinator to correct the deficiency
- The timeframe to correct the deficiency
- Plan for monitoring the progress of the corrective action plan

The CAP will be submitted to the Office of Title VI for approval. Once approved, the department will implement the action plan and provide periodic updates. If necessary, the



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coordinator will update the Title VI Plan and the departments will update its procedures to reflect the outcome of the CAP. The CAP and its results will be included in the Title VI Nondiscrimination Annual Work Plan & Accomplishment Report to the TxDOT.

The Title VI Compliance Coordinator will determine if additional monitoring is needed to ensure on-going compliance with Title VI requirements.

Data Collection/Data Analysis/Data Reporting

Statistical data on race, color, national origin, of participants in and beneficiaries of the City's programs will be gathered annually and analyzed to determine the investment benefits and burdens to the population, including minority and low-income populations. Beneficiaries include relocatees, impacted citizens, and affected communities. Collecting, analyzing, and maintaining statistical data are crucial elements of a Title VI/Nondiscrimination enforcement program because they constitute an effective mechanism by which to numerically assess the reach and impact of program funds.

The City's federal program areas will be notified through a memorandum sent from the Title VI Compliance Coordinator to the director of each department's federal program area to submit a data analysis report. The Office of Title VI will work with the federal program areas to identify where data needs to be analyzed. Data analysis results will be included in the Title VI/Nondiscrimination Annual Work Plan & Accomplishment Report. Collecting and analyzing data to numerically assess the reach and impact of its program funds. Separately complying with Limited English Proficiency (LEP) Plan and Public Participation (PP) by monitoring and reporting requirements.

Potential sources of data and analysis tools include:

- Census Data
- American Community Survey
- School Districts
- Forms or Surveys from the public
- MPO Committees (e.g., Citizen Advisory Committees)
- Field Observations



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Title VI Complaint Handling Procedures

Scope of Title VI Complaints

No person or groups of persons shall, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the City of El Paso and its contractors on the grounds of race, color, or national origin.

The Title VI Compliance Coordinator is charged with ensuring Title VI complaints received by the City are processed in accordance with the City's Complaint Handling Procedures outlined in this plan which includes maintaining a complaint log, using form letters, investigative plans, reports, and investigation formats.

The scope of Title VI covers all internal and external activities of the City of El Paso.

The following types of actions are prohibited under Title VI protections (See 49 C.F.R. 21.5):

- Excluding individuals or groups from participation in programs or activities
- Denying program services or benefits to individuals or groups
- Providing a different service or benefit or providing them in a manner different from what is provided to others
- Denying an opportunity to participate as a member of a planning, advisory or similar body that is an integral part of the program
- Retaliation for making a complaint or otherwise participating in any manner in an investigation or proceeding related to Title VI of the Civil Rights Act of 1964

How to File a Formal Title VI Complaint

Any person(s) or organization(s) believing they have been discriminated against on the basis of the protected classes stated above by the City of El Paso or its contractors may file a Title VI complaint.

Discrimination complaints **must be received no more than 180 days after the alleged incident** unless the time for filing is extended by the City Administrator or a designee in the interest of justice, specifying in writing the reason for so doing.

All Title VI Complaints submitted must be in writing and must be signed by the complainant and/or the complainant's representative. Complaints may be filed by mail, fax, in person, or e-mailed.



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A complaint should contain the following information:

- A written explanation of the alleged discriminatory actions;
- The complainant's contact information, including, if available: full name, postal address, phone number, and email address;
- The basis of the complaint (e.g., race, color, national origin, etc.);
- The names of specific persons and respondents (e.g., agencies/organizations) alleged to have discriminated;
- Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

Attn: City of El Paso Office of Title VI and ADA (Accessibility)

Mailing Address: 801 Texas Ave. 3rd Floor, El Paso, Texas (79901)

Email: TitleVIOffice@elpasotexas.gov

Phone: (915)212-1677

If necessary, the complainant may call the phone number above and provide the allegations by telephone. The Title VI Coordinator or assigned Title VI staff will transcribe the allegations of the complaint as provided over the telephone and send a written complaint to the complainant for correction and signature. The complaint shall then be handled in the usual manner.

Within 10 business days of the receipt of the complaint, the Office of Title VI and ADA (Accessibility) will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation.

The Office of Title VI will review every complaint, determine the most appropriate fact-finding process, and when necessary, assign a neutral party to investigate. At a minimum, the investigation will include:

- Review of all relevant documents, practices, and procedures
- Identify and interview persons with knowledge of the alleged Title VI violation.

No information is disclosed with City personnel or any other party not involved in the investigation process.

Within 30 days of receipt of the complaint, the Title VI Compliance Coordinator or designated staff will complete a Report of Investigation (ROI) setting forth all the relevant facts obtained during the investigation. The ROI will include a finding for each issue and recommendations



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where necessary. Documentation regarding any attempts and outcomes that were made to resolve the complaint prior to the initial receipt of the written complaint will be summarized in the ROI.

The final report will be sent to the Department Head of the department involved with a copy to the City Attorney's Office and the complainant.

If no violation is found and the complainant wishes to appeal, the complainant may appeal directly to the City Manager's Office at:

City Manager
City of El Paso
300 N. Campbell
El Paso, Texas 79901

Complaints may also be filed directly with the following federal agencies:

Texas Department of Transportation
Office of Civil Rights
125 East 11th Street
Austin, Texas 78701-2483

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, S.W.
Washington, D.C. 20591

Federal Transit Administration
Office of Civil Rights
819 Taylor Street, Room 8A36
Fort Worth, Texas 76102

U.S. Department of Homeland Security
Office for Civil Rights and Civil Liberties
2707 Martin Luther King, Jr. Ave., SE
Washington, D.C. 20528

Title VI external discrimination complaint procedures and complaint forms may be found at <https://www.elpasotexas.gov/ada/title-vi>



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The City's External Discrimination Complaint Form is available in both English and Spanish as Attachment 5

Complaint Log

The Title VI staff will maintain a complaint log, which documents all activity related to Title VI complaints. A copy of the log is included in Attachment 5. Information captured includes:

- Complainant's name, and if provided, race, color, and national origin;
- Respondent's name;
- Basis(es) of the discrimination complaint;
- Allegation(s)/Issue(s) surrounding the discrimination complaint;
- Date the discrimination complaint was filed;
- Date the investigation was complete;
- Disposition;
- Disposition date; and
- Other pertinent information.

The City Attorney's Office maintains a separate record of lawsuits of discrimination. The data from both logs will be included in the Annual Work Plan and Accomplishments Report.

Internal Complaints Policy Statement

Human Resources: Employee Discrimination Related Complaints

The City desires to provide and maintain a harmonious work environment that is free of hostility and discrimination. Discrimination complaints made by employees are handled by the Human Resources department and have a separate complaint procedure. The Human Resources Officer serves as the Equal Employment Opportunity Officer.

Employees may file a complaint by submitting a complaint request using the link below and a Human Resources representative will reach out to provide guidance.

[Employee Relations – My El Paso](#)

Sun Metro: Internal Title VI Mass Transit Related Complaints



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Any person who believes they have been harmed by an unlawful discriminatory practice regarding Sun Metro's programs has a right to file a formal complaint with Sun Metro. Any such complaint must be submitted in writing or via phone call to the Sun Metro Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence. For more information regarding civil rights complaints related to transportation, please contact:

Title VI Coordinator: Sun Metro
10151 Montana Ave,
El Paso, Texas 79925
(915) 212-3333

Airport: Aviation Discrimination Complaints

It is unlawful for airport operators and their lessees, tenants, concessionaires and contractors to discriminate against any person because of race, color, national origin, sex, creed, or disability in public services and employment opportunities. Allegations of discrimination as they relate to aviation should be promptly directed to the El Paso International Airport.

Discrimination Form can be found and submitted online using the following link:

[Microsoft Word - Complaint of Discrimination Form](#)

Or by mail to the following address:

Attn: Title VI Coordinator
El Paso International Airport
Airport Administration
6701 Convair Road
El Paso, TX 79925

Notice of Rights

In accordance with 23 CFR 200.9(a)(12), the City of El Paso is required to develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English. Notice of the City of El Paso's Title VI policies and procedures are listed in many places such as the City's Website; posters are placed at various public buildings or shown on City monitors.

A poster detailing an individual's rights under Title VI will be available in English and in Spanish at public buildings and accessible on the City's website. The poster is included as Attachment 7 and may be found at <https://www.elpasotexas.gov/ada/title-vi>



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Notification to Beneficiaries

The City of El Paso website is continuously updated to ensure Title VI information is readily accessible to the public. The website informs the public of their rights under Title VI and provides information on how to file a complaint. Title VI information available on the City of El Paso Web site includes:

- Title VI/Nondiscrimination Policy Statement
- Title VI/Nondiscrimination Assurances
- Title VI/Nondiscrimination Plan
- Title VI Staff Contact Information
- Title VI Complaint Handling Procedures
- City of El Paso Language Assistance Plan
- City of El Paso Public Participation Plan
- Title VI/Nondiscrimination Program Visibility Posters (English and Spanish)

Public Participation

The City of El Paso's Public Participation Plan may be found at <https://www.elpasotexas.gov/ada/title-vi>

It is the goal of the City of El Paso to provide continuous, effective and transparent access to all stakeholders. City of El Paso strives to inform all stakeholders about proposed plans and projects and seeks input when appropriate. City of El Paso utilizes the following methods to communicate information regarding upcoming activities and opportunities for public and stakeholder participation in the planning process:

- Newsletters/Mailings
- Online Engagement Platforms
- Media Releases
- City of El Paso Website
- Media Campaigns
- Social Media Platforms
- MPO Websites
- Visualization Presentations
- Local Community Public Meetings



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Traditionally underserved communities can find it more difficult to engage with decision making entities due to scheduling conflicts, lack of transportation to public involvement events, language barriers, lack of childcare, etc. Genuine public involvement takes place at all levels and so the City of El Paso aims to identify communities that may be affected by a project in order to plan appropriately and effectively for the potentially impacted groups. Sources of data used were listed above in the Data Gathering section. City of El Paso specifically uses the following sources to identify minority and populations with limited English proficiency.

- Us census table p9 - Hispanic or Latino and not Hispanic or Latino by race
- Acs table 816001 - language spoken at home by ability to speak English for the population 5 years and over

The City of El Paso will use the following techniques to ensure that all members of the community have the opportunity to participate in the decision-making process:

- Hold meetings at convenient and accessible times
- Holding meetings at various locations in different neighborhoods
- Offering virtual/hybrid options
- Translating documents into languages other than English
- Holding events accessible by public transportation

All public input should be derived from a range of various sources. As appropriate and whenever possible, public comments should be used to revise work scopes, plans and programs. City staff is responsible for responding to comments in a timely manner and/or for forwarding these comments to policy makers considering action.

Departments should use the information obtained through its public outreach efforts to review the effectiveness and progress of its programs. In turn, the public participation plan should be updated periodically to ensure compliance with Title VI of the Civil Rights Act of 1964. The office of Title VI will be responsible for coordinating any plan updates.

The records shall be maintained for a period pursuant to the requirements of each program and/or the Texas Library Archives Records Retention Schedules, whichever is longer.

Language Assistance and Limited English Proficiency

Individuals with Limited English Proficiency (LEP) are those who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English as a result



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of their national origin. Under Title VI, these individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

A general four-factor analysis will help anticipate and prepare for what may be needed; however meaningful four-factor analysis can only occur on a project-by-project basis. When preparing to publish a document, launch a campaign, hold a public meeting, etc., a focused four-factor analysis should be conducted to determine what type of language assistance is needed.

The Limited English Proficiency Plan can be found at <https://www.elpasotexas.gov/ada/title-vi>

Training

The City of El Paso will ensure that its staff understand Title VI of the Civil Rights Act of 1964 and how it may apply to their work. The following options are available for training opportunities:

- Review of the City of El Paso Title VI Plan
- City Staff and Subrecipients may obtain training through EP Learners
- Attendance at any available Title VI trainings provided by the Texas Department of Transportation, U.S. Department of Transportation or its applicable operating administrations, or the U.S. Department of Justice.
- Viewing the video [Understanding and Abiding by Title VI of the Civil Rights Act of 1964](#) produced by the U.S. Department of Justice

The City of El Paso will maintain records indicating that staff have received sufficient training on a periodic basis.



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Title VI/ Nondiscrimination Plan

Attachments



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Attachment 1

Authorities

The authorities applicable to the City's Title VI program are included below:

- City of El Paso Charter, Section 6.1-11 Non-Discrimination, (affords equal employment and benefit opportunities);
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 CFR Part 21 (entitled Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of The Civil Rights Act of 1964);
- 23 CFR Part 200 (FHWA's Title VI/Nondiscrimination Regulation);
-
- 28 CFR Part 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964); and,
- Texas Administrative Code §9.4, Civil Rights - Title VI Compliance



Office of Title VI and ADA (Accessibility)

Attachment 2



Office of Title VI and ADA (Accessibility)

MAYOR
Renard U. Johnson

City of El Paso

CITY COUNCIL

District 1
Alejandra Chávez

District 2
Dr. Josh Acevedo

District 3
Deanna M. Rocha

District 4
Cynthia Boyar Trejo

District 5
Ivan N.ño

District 6
Art Fierro

District 7
Lay Limón

District 8
Chris Canales

CITY MANAGER
Dionne Mack

Title VI and Related Statutes Nondiscrimination Statement

The City of El Paso, as a recipient of Federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination or retaliation in any federally or non-federally funding City programs or activities administered by the City of El Paso.

This Policy Statement was signed by the City of El Paso's City Manager on this
15 Day of October, 2025.

Dionne Mack, City Manager
City of El Paso, Texas



City 1 | 300 N. Campbell | El Paso, Texas 79901 | (915) 212-0000

DELIVERING EXCEPTIONAL SERVICES



Office of Title VI and ADA (Accessibility)



Office of Title VI and ADA (Accessibility)

MAYOR
Renard U. Johnson

Ciudad de El Paso

CITY COUNCIL

Título VI y Estatutos Relacionados

District 1
Alejandra Chávez

Declaración de No Discriminación

District 2
Dr. Josh Acevedo

La Ciudad de El Paso, Texas, como receptora de asistencia financiera federal y bajo el Título VI de la Ley de Derechos Civiles de 1964 y estatutos relacionados, garantiza que ninguna persona por motivos de raza, color, origen nacional, será excluido de la participación, se le negarán los beneficios de, o de otra manera ser objeto de discriminación o represalias en cualquier programa o actividad de la Ciudad de El Paso que se financie a nivel federal o no federal.

District 3
Deanna M. Rocha

District 4
Cynthia Boyar Trejo

District 5
Nan Niño

Esta Declaración de Política fue firmada por la Administradora de la Ciudad de El Paso, El 15 Día de Octubre de 2025.

District 6
Art Fierro

District 7
Lay Lamón

District 8
Chris Canales

CITY MANAGER
Dionne Mack


Dionne Mack,
Administradora de la Ciudad El Paso, Texas

2024-2025 Title VI and ADA Statement
or VI Non-Discrimination Statement Form 10/2024

City 1 | 300 N. Campbell | El Paso, Texas 79901 | (915) 212-0000



DELIVERING EXCEPTIONAL SERVICES



Office of Title VI and ADA (Accessibility)

Title VI/Nondiscrimination Assurances



Office of Title VI and ADA (Accessibility)

Attachment 3 *Title VI Assurances*

The City of El Paso (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration (FHWA), is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient, hereby gives assurance that it will promptly take any measures necessary to ensure 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 otherwise subjected to



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discrimination under any program or activity," for which the Recipient receives Federal financial assistance from U.S. DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the City of El Paso, agrees with and gives the following Assurances with respect to its Federally-assisted U.S. DOT programs:

1. The Recipient agrees that each "activity," facility," or "program," as defined in §§ 21.23(b) and 21.23(e) or 49 C.F.R § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests for Proposals for work, or material subject to the Acts and the Regulations made in connection with all programs administered and, in adapted form, in all proposals for negotiated agreements regardless of funding source:



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"The City of El Paso, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and Appendix E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in *Appendix C and Appendix D* of this Assurance, as a covenant running with the land, in any future deeds, leases,



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licenses, permits, or similar instruments entered into by the Recipient with other parties:

- a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods.
- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the programs as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will



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comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance. By signing this assurance, the Recipient also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the U.S. DOT access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the U.S. DOT. You must keep records, reports, and submit the material for review upon request to U.S. DOT, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Recipient gives this assurance in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. DOT under all Department of Transportation Programs. This assurance is binding on Texas, other recipients, subrecipients, sub-grantees, contractors, subcontractors and their subcontractors, transferees, successors in interest, and any other participants in all Department of Transportation programs.



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The person(s) signing below is/are authorized to sign this assurance on behalf of the City of El Paso.

The Title VI Nondiscrimination Assurances were signed by the City of El Paso's City Manager on this 15 Day of October, 2025.

A handwritten signature in blue ink, appearing to read "Dionne Mack", is written over a horizontal line.

Dionne Mack, City Manager
City of El Paso, Texas



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APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, the FHWA, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or FHWA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Nondiscrimination provisions of this contract, the Recipient will impose such contract sanctions as it or FHWA may determine to be appropriate, including, but not limited to: Withholding payments to the contractor under the contract until the contractor complies, and/or cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as



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the City of El Paso or FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the City of El Paso to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

The City of El Paso. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the recipient.

Dated: Oct. 17, 2025

By: 
Dionne Mack
City Manager
City of El Paso

Appendices A, B, C, D and E



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APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States.

(GRANTING CLAUSE)

The City of El Paso. NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the Condition that the City of El Paso will accept title to the lands and maintain the project constructed thereon in accordance with all applicable federal statutes, the Regulations for the Administration of all DOT programs, and the policies and procedures prescribed by FHWA of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto City of El Paso the all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

The City of El Paso. TO HAVE AND TO HOLD lands and unto and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the City of El Paso, its successors and assigns.

The City of El Paso, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that

(1) no person will 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed, and

(2) that the City of El Paso shall use the lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in



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Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)



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APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Recipient pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for themselves, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, the City of El Paso will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter and repossess said lands and facilities thereon, and above described lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, City of El Paso will have the right to enter or re-enter the lands and facilities thereon, and the above-described lands and facilities will there upon revert to and vest in and become the absolute property of the City of El Paso

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)



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APPENDIX D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by (Title of Recipient) pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that
 - 1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities,
 - 2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination,
 - 3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, the City of El Paso will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued. *
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the City of El Paso will there upon revert to and vest in and become the absolute property of the City of El Paso and its assigns. *

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)



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APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

1. Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
2. The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
3. Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex); • Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
4. The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age); Airport and Airway Improvement Act of 1982, (49 USC § 4 71, Section 4 7123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
5. The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
6. Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
7. The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
8. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;



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9. Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to -ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
10. Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U .S.C. 1681 et seq).



CITIZENS OF EL PASO



EL PASO CITY COUNCIL

Boards & Commissions
Regional Bodies

Internal Auditor
Edmundo Calderon

City Attorney
Karla M. Nieman

City Manager
Dionne Mack

**Chief Strategy
Officer**
Juliana Baldwin-Muñoz

**Strategic
Communications**
Laura Cruz-Acosta

**Strategic and
Legislative Affairs**
Ian Voglewede

**Community Driven
Innovation**
Roman Sanchez

City Clerk
Laura Prine

Deputy City Manager
Richard Bristol

**Deputy City Manager /
Chief Financial Officer**
Robert Cortinas

Deputy City Manager
Nicole Coto

Deputy City Manager
Mario D'Agostino

Deputy City Manager
Araceli Guerra

**Deputy City Manager /
City Engineer**
Yvette Hernandez

Animal Services
Terry Kebschull

Libraries
Norma Martinez

**Museum & Cultural Affairs/
Destination El Paso**
Ben Fyfe

Parks & Recreation
Pablo Caballero

Public Health
Veerinder "Vinny" Taneja

Zoo & Botanical Gardens
Joe Montisano

Comptroller's Office
Margarita Marin, Deputy CFO

**Economic & International
Development**
Karina Brasgalla

International Bridges
Roberto Tinajero

**Office of Management &
Budget**
Sasho Andonoski

Tax Office
Maria Pasillas

Planning & Inspections
Philip Etwe

Public Transportation
Anthony Dekeyzer

**Purchasing & Strategic
Sourcing**
Claudia A. Garcia

Real Estate Division

Urban Planning & Design
Division

Code Enforcement
Steve Alvarado

**Fire / Office of Emergency
Management / 911 & 311
Communications**
Chief Jonathan Killings

Municipal Court
Annabelle Casas

Police
Chief Peter Pacillas

**Community and Human
Development**
Nickole H. Rodriguez

Environmental Services
Nick Ybarra

Human Resources
Mary Wiggins

Information Technology
Carolyn Patrick

**Information Security
Assurance**
Ernesto Arriola

Risk Management
Yvette Griffin

Aviation
Tony Nevarez

Capital Improvement
Gilbert Guerrero (Interim)

CID Grant Funded Programs
Joaquin Rodriguez

Streets & Maintenance
Randy Garcia

Effective 07/28/2025