Agenda Item #13.1
For Council Meeting of April 1, 2025

CITY OF SANTA ROSA
CITY COUNCIL

TO: MAYOR AND CITY COUNCIL
FROM: RACHEL EDE, DEPUTY DIRECTOR
TRANSPORTATION AND PUBLIC WORKS DEPARTMENT
SUBJECT: APPROVAL OF 2025 UPDATE TO SANTA ROSA CITYBUS TITLE VI PROGRAM

AGENDA ACTION: RESOLUTION

RECOMMENDATION

It is recommended by the Transportation and Public Works Department that the Council, by resolution, approve the 2025 update to the Santa Rosa CityBus Title VI Program, addressing the Transit Division's responsibilities under Title VI of the Civil Rights Act of 1964.

EXECUTIVE SUMMARY

The Federal Transit Administration (FTA) requires all agencies that receive federal financial assistance to document compliance with the Title VI Program of the Civil Rights Act of 1964 by developing a Title VI Program and updating it every three years. The Title VI Program update must be approved by the agency's governing body. The Transportation and Public Works Department last updated the Title VI Program in 2022, and an update is due to the FTA by April 1, 2025.

BACKGROUND

Title VI of the Civil Rights Act of 1964 provides that no person shall, on the grounds of race, color or national origin be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. All programs receiving financial assistance from the Federal Transit Administration (FTA) are subject to Title VI and the U.S. Department of Transportation (USDOT) implementing regulations. The City of Santa Rosa is a recipient of financial assistance from the FTA, supporting Transit Division operations and capital needs.

The FTA requires all direct and primary recipients of FTA financial assistance document their compliance with Title VI by submitting a Title VI Program update once every three years. The Title VI Program update must be approved by the recipient's governing body, in this case the Santa Rosa City Council, prior to submission.

PRIOR CITY COUNCIL REVIEW

On May 10, 2022, the City Council, by resolution, approved the 2022 update to the Santa Rosa CityBus Title VI Program.

ANALYSIS

The Title VI Program update has been prepared in accordance with the regulations and guidance for transit operators provided in FTA Circular 4702.1B. The Title VI Program encompasses the following areas:

1) Public notice of protections from discrimination provided by Title VI;
2) Procedures for filing a Title VI complaint and complaint form;
3) List of any Title VI complaints, investigations or lawsuits naming Santa Rosa CityBus since the last filing of the Title VI Program update with FTA;
4) Public participation plan for transit service planning and projects, and list of public outreach activities conducted since the last filing of the Title VI Program update;
5) Language assistance plan to ensure access to services for individuals with Limited English Proficiency;
6) Equity analysis related to the determination of the site or location of new transit facilities, if any; and
7) Systemwide service standards and policies to ensure that transit services and amenities are deployed in a non-discriminatory manner.

The primary change in the 2025 Title VI Program is the update of the Language Assistance Plan component. To complete the update of the Language Assistance Plan, staff conducted a survey of Spanish-speaking CityBus riders, consulted with community organizations serving large numbers of limited English speakers, solicited feedback from CityBus and Santa Rosa Paratransit staff on their experience assisting limited English speakers and their suggestions for additional language assistance, and updated demographic data related to limited English speakers in Santa Rosa. Examples of needs identified for additional language assistance measures include more printed information onboard buses and at transit facilities, bus stops, and community gathering locations, and information to assist riders in accessing trip planning information, including using mobile apps. In addition, the updated analysis of demographic information for Santa Rosa revealed that Vietnamese has surpassed the threshold to be considered a “Safe Harbor” language under the USDOT’s Title VI implementing regulations. Accordingly, CityBus will begin to incorporate Vietnamese language translation into public information to ensure compliance with federal rules.

FISCAL IMPACT

Approval of this action does not have a fiscal impact on the General Fund. Modest additional translation costs are anticipated in the Transit Fund to accommodate incorporating Vietnamese language translation into public information. These costs can be accommodated within the Transit Division FY25 budget.

ENVIRONMENTAL IMPACT

The Council finds pursuant to CEQA Guidelines Section 15378, the proposed action is not a “project” subject to the California Environmental Quality Act (CEQA) because it does not have a potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. In the alternative, the proposed action is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) because it can be seen with certainty that there is no possibility that the project may have a significant effect on the environment.

BOARD/COMMISSION/COMMITTEE REVIEW AND RECOMMENDATIONS

Not applicable.

NOTIFICATION

Not applicable.

ATTACHMENTS

- Resolution/Exhibit A (2025 Title VI Program Update)

PRESENTER

Rachel Ede, Deputy Director-Transit