

CITY OF SANTA ROSA
CITY COUNCIL

TO: MAYOR AND CITY COUNCIL
FROM: DAN HENNESSEY, DIRECTOR, TRANSPORTATION AND
PUBLIC WORKS DEPARTMENT
SUBJECT: FEDERAL HIGHWAY ADMINISTRATION TITLE VI
IMPLEMENTATION PLAN ADOPTION

AGENDA ACTION: MOTION

RECOMMENDATION

The Transportation and Public Works Department recommends that the Council, by motion, adopt the City of Santa Rosa Local Agency Federal Highway Administration (FHWA) Title VI Implementation Plan. This item has no impact on current fiscal year budget.

EXECUTIVE SUMMARY

The Federal Highway Administration (FHWA) requires local agencies receiving or seeking federal transportation funding to maintain a compliant Title VI Implementation Plan demonstrating adherence to federal nondiscrimination requirements under Title VI of the Civil Rights Act of 1964 and related authorities. In 2025, Caltrans notified the City that it was out of compliance with FHWA Title VI requirements because the City did not have an adopted Title VI Implementation Plan in place. Adoption of the proposed plan will establish the City's formal framework for compliance with federal nondiscrimination requirements and preserve eligibility for FHWA funding opportunities administered through Caltrans.

GOAL

This item relates to Council Goal #2 - Invest in the Development and Maintenance of the City's Infrastructure by maintaining compliance with federal transportation requirements to preserve the City's eligibility for federal funding sources that support roadway maintenance, safety, and infrastructure improvement projects.

BACKGROUND/PRIOR COUNCIL REVIEW

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. The FHWA requires local agencies that receive federal transportation funding, either directly

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or through Caltrans, to maintain a Title VI Implementation Plan documenting the agency's policies, procedures, complaint process, public outreach practices, and compliance responsibilities.

Caltrans serves as the oversight agency for local agency FHWA compliance within California. In 2025, Caltrans conducted a review of the City's FHWA Title VI compliance documentation and notified the City that it did not meet FHWA Title VI documentation requirements because a formal FHWA Title VI Implementation Plan had not been adopted.

The proposed Local Agency FHWA Title VI Implementation Plan has been prepared to address Caltrans' findings and establish the City's framework for ongoing compliance with federal nondiscrimination requirements applicable to federally funded transportation projects and programs.

There has been no prior Council review of this specific plan. Council has reviewed and approved Federal Transit Administration (FTA) Title VI Implementation Plans from Santa Rosa CityBus (last adopted April 1, 2025); this FHWA Title VI Implementation Plan has been modeled after that version.

ANALYSIS

The proposed Local Agency FHWA Title VI Implementation Plan establishes the City's formal procedures and administrative framework for compliance with federal Title VI requirements associated with FHWA-funded transportation programs and projects.

Key elements of the plan include:

- Designation of a Title VI Coordinator responsible for oversight and compliance activities;
- Procedures for processing and investigating Title VI complaints;
- Public outreach and language assistance procedures intended to improve access to City transportation programs and services;
- Training and reporting requirements; and
- Documentation of the City's nondiscrimination policy and compliance commitments.

Adoption of the plan is necessary to address Caltrans' 2025 notice of noncompliance and to maintain the City's eligibility for current and future FHWA funding opportunities administered through Caltrans. FHWA funding sources support a variety of local transportation activities, including roadway rehabilitation, bicycle and pedestrian improvements, traffic safety projects, and related infrastructure investments.

If the City does not adopt and maintain a compliant Title VI Implementation Plan, the City could risk delays, restrictions, or loss of eligibility for FHWA-funded transportation

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projects. The proposed action is consistent with the City's goals related to maintaining transportation infrastructure and pursuing outside funding opportunities to support public infrastructure improvements. FHWA and Caltrans require local agencies to update and adopt the Title VI Implementation Plan every three years. Staff is not aware of any FHWA funding that has been withheld as a result of the City's noncompliance finding; however, adoption of the plan is necessary to maintain eligibility for future funding opportunities.

FISCAL IMPACT

Approval of this action does not have a fiscal impact on the General Fund. Adoption of the Local Agency FHWA Title VI Implementation Plan is an administrative compliance action required to maintain eligibility for FHWA transportation funding opportunities administered through Caltrans. Implementation and maintenance of the plan will be accomplished using existing staff resources. The plan was developed by TPW Director Hennessey, who will also serve as the Title VI Coordinator for the City's FHWA Title VI Implementation Plan.

ENVIRONMENTAL IMPACT

Pursuant to CEQA Guidelines Section 15378, the recommended 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 recommended 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 recommended action may have a significant effect on the environment.

BOARD/COMMISSION/COMMITTEE REVIEW AND RECOMMENDATIONS

Not applicable.

NOTIFICATION

Not applicable.

ATTACHMENTS

- Attachment 1 – Caltrans Division of Local Assistance Federal Highway Administration (FHWA) Title VI Program Assessment Report
- Attachment 2 – City of Santa Rosa Local Agency Federal Highway Administration (FHWA) Title VI Implementation Plan

PRESENTER(S)

Dan Hennessey, Director, Transportation and Public Works Department