



## Council Agenda Report

Item 6f

**Department:** Public Works  
**Cost Center:** 5201/5001  
**For Agenda of:** 9/2/2025  
**Placement:** Consent  
**Estimated Time:** N/A

**FROM:** Aaron Floyd, Interim Public Works Director  
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**SUBJECT:** ADOPTION OF TITLE VI PROGRAMS FOR SLO TRANSIT AND FOR THE PUBLIC WORKS DEPARTMENT

### RECOMMENDATION

1. Adopt a Draft Resolution entitled, "A Resolution of the City Council of the City of San Luis Obispo, California, approving the adoption of San Luis Obispo (SLO) Transit's Federal Transit Administration Title VI Program update for federal fiscal years 2026-2028"; and (Attachment A)
2. Adopt a Draft Resolution entitled, "A Resolution of the City Council of the City of San Luis Obispo, California, approving the adoption of the Public Works Department's Title VI Program Plan." ( Attachment B)

### POLICY CONTEXT

The City of San Luis Obispo (City) is a direct recipient of Federal Transit Administration (FTA) funds and, as such, is subject to Title VI of the Civil Rights Act of 1964 and related non-discrimination requirements under U.S. Department of Transportation regulations. The City is also a subrecipient of Federal Highway Administration (FHWA) funds through the California Department of Transportation (Caltrans). Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

In accordance with FTA [Circular 4702.1B](#), all direct recipients must submit a Title VI Program every three years to demonstrate compliance. This program must be approved by the recipient's governing board prior to submission to the FTA. For SLO Transit, the current update is due by October 1, 2025.

Separately, Caltrans, acting as a pass-through agency for FHWA funds, is [requiring](#) that recipient agencies, including the City of San Luis Obispo, establish a Title VI program that is subject to review by Caltrans pursuant to 23 CFR 200.9(b)(7).

While the City's Transit Program has historically maintained its own standalone Title VI Program, the City has now developed a department-wide Title VI Program Plan for Public Works in response to Caltrans' request. Although there is some overlap between the two plans, the Transit Program includes additional operational requirements, including specific public outreach and service monitoring requirements related to ongoing transit operations—not just capital projects.

To streamline review and approval, both the updated SLO Transit Title VI Program and the new Public Works Title VI Program are being presented to the City Council together, as separate attachments, within a single Council agenda item.

Both Title VI Programs must be adopted by the recipient's governing body—in this case, the City Council—prior to submission to the FTA and to Caltrans. Attachment A includes a draft Resolution approving the SLO Transit Title VI Program for federal fiscal years 2026–2028. Attachment B includes a draft Resolution approving the Public Works Department Title VI Program.

## **DISCUSSION**

### **Background**

The discussion below outlines the key elements required to be included in each of the plans.

### ***Attachment C – SLO Transit Plan***

The FTA provides financial assistance to agencies for the improvement, maintenance, and operations of their respective transit systems. The objectives of the FTA's Title VI Program are to ensure that the level and quality of public transportation service is provided in a non-discriminatory manner; to promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency. SLO Transit's Title VI Program must include the following elements to be considered in compliance:

1. A copy of SLO Transit's Title VI notice to the public
2. A copy of the SLO Transit's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form
3. A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed since the time of the last submission
4. A public participation plan and a summary of outreach efforts made since the last Title VI Program submission
5. A copy of SLO Transit's plan for providing language assistance to persons with limited English proficiency
6. A table depicting the racial breakdown of the membership of transit-related, non-elected planning boards, advisory councils or committees (i.e. Mass

Transportation Committee)

7. System-wide service standards policies for vehicle load, vehicle headway, on-time performance, service availability, vehicle assignments, and transit amenities

In compliance with federal statutory and administrative requirements, staff updated SLO Transit's Title VI Program for federal fiscal years 2026-2028 (Attachment C). Once the program update is approved, staff will submit it to the FTA for review and approval.

***Attachment D – Public Works Plan***

The FHWA provides financial assistance to agencies for the planning, construction, and maintenance of transportation infrastructure. Its Title VI Program ensures that federally funded highway programs are delivered in a non-discriminatory manner. In June 2025, Caltrans conducted a Title VI Program assessment and found the City to be out of compliance with updated Federal Highway Administration (FHWA) requirements—something common among agencies that had not previously been asked to formalize a Title VI Program. While the City already integrates many of these practices through its Public Engagement and Noticing (PEN) Manual, this new Public Works Title VI Program (Attachment D) formalizes that approach. Supporting documents will be posted to the Public Works website, and will include the following elements required by Caltrans to be considered compliant:

1. Title VI Implementation Plan (Title VI Plan)
2. Title VI Coordinator
3. Title VI/Non-Discrimination Policy Statement
4. Limited English Proficiency (LEP) Assessment (Four Factor Analysis)/ Language Access Plan (LAP)
5. Dissemination of Title VI Information
6. Title VI Training for LPA Staff
7. Title VI Assurances in Contract Documents and Agreements
8. Title VI Complaint Procedures
9. Title VI Data Collection
10. Internal/External Title VI Reviews
11. Title VI Accomplishments and Goals Report (Title VI Annual Work Plan)

Once the program is approved, staff will submit it to Caltrans for review and approval.

**Previous Council Actions**

1. [On January 21, 2020](#), City Council approved SLO Transit's FFY2021-23 Title VI Program update.
2. [On March 21, 2023](#), City Council adopted Resolution No. 11401 approving SLO Transit's FFY2023-25 Title VI Program update and SLO Transit's FY2022-23 Public Transportation Agency Safety Plan.

## Public Engagement

The following is a summary of the outreach performed for SLO Transit's Title VI Program update.

1. Transit Rider Surveys – Between May 12 and May 16, 2025, 105 surveys from current riders were collected to determine how well they read and speak English, language(s) other than English spoken at home, language encounters with SLO Transit staff, how they get information about SLO Transit services, and why they ride the bus.
2. Community Partner Surveys – Between May 22 and June 10, 2025, community partners were invited to complete a survey to assess the extent to which they encounter Limited English Proficiency (LEP) populations, the types of services they offer to LEP persons, challenges with serving persons with LEP, and frequency of requests from LEP persons to translate/interpret transit information.
3. Informational Meetings – On June 11, 2025, staff held two in-person public meetings (1:30 p.m. and 5:00 p.m.) to provide an overview of the Title VI Program requirements and findings from the program update process. It was also an opportunity for the public to provide feedback on SLO Transit's services and programs.

## CONCURRENCE

The City's Office of Diversity, Equity, and Inclusion concurs with the recommended actions to adopt both Title VI Programs.

## ENVIRONMENTAL REVIEW

The California Environmental Quality Act (CEQA) does not apply to the recommended actions in this report, because the actions do not constitute a "project" under CEQA Guidelines Sec. 15378.

## FISCAL IMPACT

Budgeted: Yes

Budget Year: 2025-26

Funding Identified: Yes

## Fiscal Analysis:

Funding Sources	Total Budget Available	Current Funding Request	Remaining Balance	Annual Ongoing Cost
General Fund	\$ 0	\$ 0	\$ 0	\$ 0
Transit Fund	\$ 0	\$ 0	\$ 0	\$ 0
Other:				
<b>Total</b>	<b>\$ 0</b>	<b>\$ 0</b>	<b>\$ 0</b>	<b>\$ 0</b>

SLO Transit's annual budget includes costs of printing services, digital and print advertising, and for public outreach opportunities. These activities include production of vital documents in both English and Spanish. No additional funds are needed to implement the Title VI Program. Historically, 50 percent of SLO Transit's eligible operating expenses are funded through FTA financial assistance programs. SLO Transit's operating budget in FY 2025-26 is \$5,992,190 which means half (approximately \$3 million dollars) would be ineligible for FTA assistance without an adopted Title VI Program. Additionally, a majority of SLO Transit's capital projects are funded through FTA programs including procurement of electric buses, charging infrastructure, and maintenance of transit facilities. Without access to FTA financial assistance, some or all of these projects may not be able to move forward.

Over the years, the City has received FHWA-administered funding for multiple infrastructure projects and remains committed to pursuing future opportunities. Most notably, the City has been allocated over \$10 million in Highway Bridge Program funds for the Prado Road Bridge and Road Widening project. Formal adoption of this Title VI Program is essential to safeguard current funding and ensure continued eligibility for future federal assistance.

## ALTERNATIVES

1. ***Council could choose to adopt only one of the two Title VI Programs***—for example, the Transit Program or the Public Works Program—while deferring or declining adoption of the other. However, doing so may jeopardize the City's eligibility for federal funding through the respective agency (FTA or Caltrans/FHWA).
2. ***Council could choose not to adopt either Title VI Program***. Council could choose not to adopt either the SLO Transit or Public Works Title VI Program. Should Council pursue this option, the City would become ineligible to receive financial assistance from the FTA, which funds the majority of SLO Transit's operating and capital costs. Additionally, this could jeopardize the City's access to FHWA funds administered through Caltrans, potentially impacting future transportation and infrastructure projects.
3. ***Council could choose to direct changes to one or both plans***. Should Council pursue this option, depending on how substantive the changes are, staff would either return to Council at a later date with updated plan(s) for adoption or Council could approve the plans and direct staff make the necessary changes. Delaying Council adoption could jeopardize the City's eligibility for federal funding.

## ATTACHMENTS

- A - Draft Resolution approving SLO Transit's Title VI Program Update
- B - Draft Resolution approving the Public Works Department's Title VI Program
- C - SLO Transit Title VI Program, Final Draft
- D - Public Works Department Title VI Program, Final Draft