



SACDOT

SACRAMENTO COUNTY DEPARTMENT OF TRANSPORTATION

TITLE VI IMPLEMENTATION PLAN

DRAFT

March 25, 2025



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Introduction

Sacramento County Department of Transportation (SacDOT) is a recipient and sub-recipient of federal assistance from various federal funding programs. Recipients and sub-recipients of federal funds are required to comply with various non-discrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 (“Title VI”). Title VI requires 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 subjected to discrimination under any program or activity receiving Federal financial assistance.”

Other non-discrimination statutes that afford legal protection are Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (sex), Age Discrimination Act of 1975 (age), and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability). In addition, the Civil Rights Restoration Act of 1987 defines the word “program” to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal financial assistance.

Federal statutes and regulations require recipients of federal aid programs to prepare and implement a program to clarify roles, responsibilities, and procedures to ensure compliance with Title VI and related non-discrimination statutes. This Title VI Implementation Plan describes these elements of the SacDOT’s Title VI Program.

Non-Discrimination Policy Statement

It is the policy of the Sacramento County Department of Transportation that no person shall on the grounds of race, color, national origin, sex, disability, age, or other protected status be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the SacDOT as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

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

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, age, or other protected status include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinators and other SacDOT staff as described in this Plan are authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

Ron E. Vicari, Director
Department of Transportation
Sacramento County

Date

Non-Discriminatory Legislation

Title VI of the Civil Rights Act of 1964 – Provides 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 subjected to discrimination, under any program or activity receiving Federal financial assistance (as implemented through 23 CFR 200.9 and 49 CFR 21).

Section 162(a) of the Federal-Aid Highway Act of 1973 (Section 324, Title 23 U.S.C.) – Prohibits discrimination on the basis of sex by recipients and sub-recipients of Federal financial assistance.

Section 504 of the Rehabilitation Act of 1973 – Prohibits discrimination on the basis of disability by recipients and sub-recipients of Federal financial assistance.

The Age Discrimination Act of 1975 (Section 6101-6107, Title 42 U.S.C.) – Prohibits discrimination on the basis of age by recipients and sub-recipients of Federal financial assistance.

The Civil Rights Restoration Act of 1987 (Public Law 100-259) – Clarifies that the original intent of Congress in Title VI of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973 was to apply the non-discrimination statutes to all programs and activities of Federal-aid recipients, sub-recipients, contractors and vendors, whether all such programs are federally assisted or not.

Americans with Disabilities Act of 1990 (disability) - The Americans with Disabilities Act (ADA) is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else

Executive Order 12898 (issued February 11, 1994) – Addresses Environmental Justice regarding minority and low-income populations and requires agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations; promote nondiscrimination in federal programs substantially affecting human health and the environment; and provide minority and low-income communities access to public information and an opportunity for public participation in matters relating to human health or the environment.

Executive Order 13166 (issued August 16, 2000) – Addresses improved access to services for persons with limited English proficiency. Agencies are directed to evaluate services provided and implement a system that ensures that Limited English Proficiency (LEP) persons are able to meaningfully access the services provided consistent with, and without unduly burdening, the fundamental mission of the local agency. Agencies are directed to ensure that recipients of federal financial assistance provide meaningful access to program, services and information to their LEP applicants and beneficiaries free of charge.

Organization, Staffing, and Structure

The Director of the Department of Transportation 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 SacDOT employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

The Title VI Coordinators are responsible for implementing the SacDOT's Title VI Program and coordinating the SacDOT's compliance with Title VI and related statutes, regulations, and directives. The Title VI Coordinators have direct access to the Director of the Department of Transportation and extra-Department Directors.

Sacramento County Department of Transportation has designated the Chiefs for each SacDOT section: *Administration, Design & Engineering, Maintenance & Operations, and Planning & Programs* to perform the duties of Title VI Coordinators. In general, Administration ensures implementation of the SacDOT's Title VI program as it relates to employment opportunity programs and non-discrimination programs SacDOT wide. SacDOT sections for Design & Engineering, Planning & Programs, and Maintenance & Operations ensure implementation of the SacDOT's Title VI program as it relates to consultants and contractors. SacDOT's Management ensures implementation of SacDOT's Title VI program as it relates to public information.

The Title VI Coordinators are responsible for:

- Submitting a Title VI plan and annual reports on SacDOT's behalf;
- Developing procedures for the prompt processing and disposition of discrimination complaints;
- Leading investigations of complaints, logging and documenting resolution of complaints, and reporting complaints received to state and federal agencies as appropriate.
- Participating in the design, development, and dissemination of Title VI information to the public;
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.
- Coordinating Title VI program development with section Chiefs and Title VI Liaison's including developing procedures for the collection and analysis of statistical data, developing a program to conduct Title VI reviews of program areas; and conducting annual Title VI assessments of pertinent program areas in each of their sections;
- Supporting the development and implementation of Title VI trainings for SacDOT managers, supervisors and staff with frequent public contact, on a two-year minimum basis;
- Establishing procedures to ensure that Title VI Assurances are incorporated into all Federal-aid Contracts and Agreements;

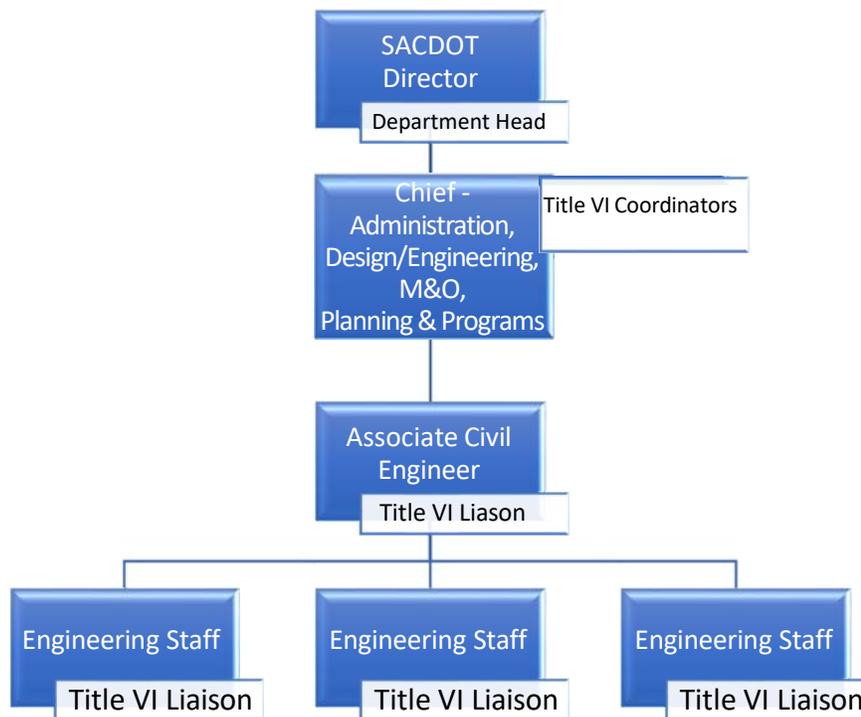
Each SacDOT section Chief, or designated Title VI Liaison for their section, will be responsible for the following Title VI compliance activities:

- Day-to-day operations of the Title VI program in their respective sections;
- Serving as the point of contact between the Title VI Coordinator and the section on all relevant Title VI issues, trainings, and complaints, assisting with investigations as needed and coordinating complaint disposition with the Title VI Coordinator;

- Preparing relevant section data and performing program area review for the Title VI annual report;
- Ensuring recommendations related to Title VI compliance are implemented;
- Assisting in their section's compliance efforts, including the tracking of Limited English Proficiency encounters, and/or otherwise assessing and remediating language access needs;
- Participating in all required Title VI trainings and relaying information as needed to department staff to ensure compliance through work with public stakeholders, contractors, and consultants;
- Reviewing all federal-aid contracts and agreements managed by their sections to ensure Title VI assurances are included.

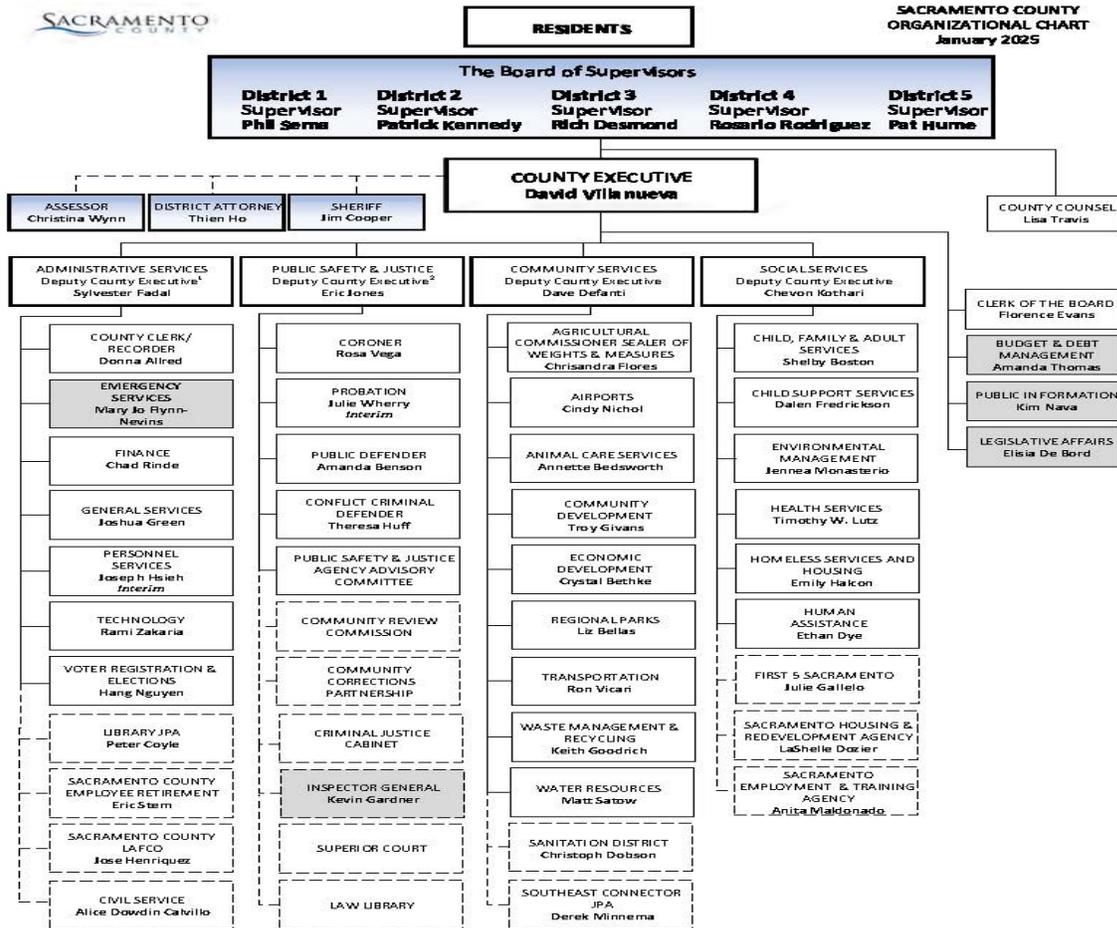
The following chart represents the reporting structure of all departments involved in SacDOT's Title VI Program and compliance process.

Title VI Organization Chart



Primary Program Area Descriptions

The overall Sacramento County Organization Chart (2025) is shown below.



Notes: 1 – Liaison to Assessor
2 – Liaison to District Attorney and Sheriff



Sacramento County is a charter form of government, governed by a five-member Board of Supervisors elected to serve four-year terms. The Board of Supervisors appoints the County Executive and County Counsel. The County Executive is responsible for the administration of county activities. Sacramento County has more than 30 departments, offices and agencies that provide services to its residents in the following primary program areas, each overseen by Deputy County Executives: *Administrative Services, Community Services, Public Safety and Justice, and Social Services*. Transportation (SacDOT) is a department within the Community Services Agency.

Title VI Complaint Procedures

Any person who believes they have been subject to discrimination within the SacDOT's programs or activities because of their race, color, national origin, or other protected status may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form with the Title VI Coordinator within 180 days of the alleged incident.

SacDOT's Title VI Complaint Form is available in Exhibit C of the Plan, with the Administration Office at Sacramento County Department of Transportation (4111 Branch Center Road, Sacramento, CA 95827), and online at <https://sacdot.saccounty.gov>. Once the Title VI complaint is received, SacDOT will investigate according to the details outlined in Exhibit C of this plan, record it in a complaint log, and forward it to Caltrans Office of Civil Rights within one business day of receipt. Any person may also file a complaint directly with the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), or Caltrans. In cases where a complainant is unable or incapable of providing a written complaint, a verbal complaint may be made.

Complaints may be submitted to the Sacramento County Department of Transportation at:

- Title VI Coordinator
Administration Office 4111
Branch Center Road
Sacramento, CA 95827

Email:

Any person may also file a complaint directly with:

- Federal Transit Administration
Civil Rights Division Attention: Complaint Team East Building, 5th Floor – TCR 1200
New Jersey Avenue, SE Washington, DC 20590
- Federal Highway Administration
U.S. Department of Transportation Office of Civil Rights
1200 New Jersey Avenue, SE 8th Floor E81-105
Washington, DC 20590
- California Department of Transportation
Office of Civil Rights
Attention: Title VI Branch
PO Box 942874, MS 79, Sacramento, CA
Title.VI@dot.ca.gov

SacDOT's sections' Title VI Coordinator will only process complaints that are complete and include the following information:

- Complainant's contact information.
- Date(s) of alleged discriminatory act(s)
- Details of alleged discrimination
- Identification of the SacDOT section responsible for the alleged discrimination.
- Basis of the complaint (e.g. race, color, or national origin)
- Signature of the complainant or complainant's representative

Per the FHWA Guidance Memorandum, Processing of Title VI Complaints, dated June 13, 2018 all Title VI complaints received by a sub-recipient (e.g., SacDOT) are to be forwarded to Caltrans to be submitted to FHWA Division Office. Complaints should be sent within one business day of receipt via email to Title.VI@dot.ca.gov. If Headquarters Office of Civil Rights (HCR) determines a Title VI complaint against a sub-recipient can be investigated by Caltrans, HCR may delegate the task of investigating the complaint to Caltrans

Caltrans Office of Civil Rights (OCR) Investigation Process:

If OCR is delegated the responsibility of performing an investigation, OCR has 90 days to investigate the complaint. If additional time is needed, OCR will call the Complainant and inform them.

If more information is needed to resolve the case, the OCR investigator may contact the Complainant. The Complainant has ten 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 ten business days, OCR can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

OCR will consult with HCR regarding the disposition of the complaint. Disposition of Title VI complaint will be undertaken by HCR, through either (1) informal resolution or (2) issuance of a Letter of Finding of compliance or noncompliance with Title VI. A copy of the Letter of Finding will be sent to all parties via the Division Office.

Title VI Complaints Processed Under the Federal Transit Administration (FTA):

Per FTA, Title VI complaints are to be handled at the local level or elevated to FTA under egregious Title VI discriminatory circumstances. The Complainant will receive an acknowledgement letter informing them that the complaint has been received and whether the complaint will be investigated by Caltrans or forwarded to FTA.

Notice of Rights

Sacramento County Department of Transportation will publicly display the “Notice of Rights”, available in Exhibit B of this plan, at SacDOT customer service counters. The notice states SacDOT will comply with Title VI and ensure no person shall on the grounds of race, color, national origin, sex, disability, age, or other protected status be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any programs, activities, or services of the Sacramento County Department of Transportation. The notice will be provided in English, Spanish, Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic. Other languages and formats will be provided upon request. Title VI materials will also be available at <https://sacdot.saccounty.gov>.

Data Collection

SacDOT will be continually working to improve data collection and analysis methods to provide greater effectiveness of the Plan. SacDOT sections may collect and analyze data related to their respective programs, projects, activities, and services. This data helps SacDOT determine the needs and characteristics of the communities impacted by its programs, projects, and services. In turn, this supports SacDOT in tailoring its services to its population, deliver effective and equitable services, and ensure meaningful access to information, programs, and activities. SacDOT sections are responsible for reviewing their data collection and analysis procedures to ensure outreach methods are effective.

Demographic and related data collected and used by SacDOT staff comes from governmental sources responsible for collecting and analyzing the information for consistency and accuracy. These sources include, but are not limited to, the U.S. Bureau of Labor Statistics, U.S. Census Bureau, U.S. Bureau of Economic Analysis, California Department of Finance, California Department of Labor, the California Employment Development Department, and Sacramento Area Council of Governments (SACOG).

For federally funded projects, SacDOT staff may employ various methods to collect project specific demographic data during the public outreach process. These methods may include social media releases, surveys, public meetings, and public comments collected on project websites.

Title VI Outreach and Resources

Table: English Proficiency by Language Spoken at Home for Unincorporated Sacramento County's Residents

	Population Estimate	Percent
Total	592,313	100.0%
Speak only English	401,192	67.7%
Speak English "very well"	105,510	17.8%
Speak English less than "very well"	85,611	14.5%
Spanish	27,203	4.6%
Other Indo-European languages	16,411	2.8%
Russian, Polish, or other Slavic languages	14,736	2.5%
Other Asian and Pacific Island languages	8,552	1.4%
Vietnamese	7,500	1.3%
Chinese (incl. Mandarin, Cantonese)	3,888	0.7%
Tagalog (incl. Filipino)	2,859	0.5%
Arabic	1,889	0.3%
Other and unspecified languages	1,097	0.2%
Korean	990	0.2%
German or other West Germanic languages	374	0.1%
French, Haitian, or Cajun	112	0.02%

Source: U.S. Census Bureau. "Language Spoken at Home for the Population 5 Years and Over." American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16001, 2023

Limited English Proficiency

A Limited English Proficiency (LEP) person is a person that does not speak English as a primary language and has a limited ability to read, write, or comprehend English. Per Executive Order 13166, agencies which receive Federal funding must examine their Federally-funded services and develop and implement processes that will allow LEP persons to meaningfully access said services. Executive Order 13166 also requires that agencies receiving Federal funding must establish guidance for providing meaningful access to LEPs, prepare a plan to overcome language barriers in Federally-funded programs and activities, and ensure that stakeholders have adequate opportunity to provide input.

As shown in the Table above, 14.5% of residents in the Unincorporated area of the County of Sacramento are considered LEP persons, with the largest shares of those LEP persons primarily speaking Spanish (4.6% of the community), Other Indo-European languages (2.8% of the community), and Russian, Polish, or other Slavic languages (2.5% of the community). As outlined in SacDOT's LEP Plan (Exhibit D), SacDOT has conducted an LEP Needs Assessment, using a Four Factor Analysis to identify needs and provide access to the LEP community in compliance with Executive Order 13166.

Title VI Information Dissemination

In order to ensure that Title VI and related Civil Rights information is readily available to the public, SacDOT will develop public notices consisting of posters, flyers, complaint forms and “I Speak” cards that are available in English, Spanish, Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic. The languages selected for the informational materials were based upon language data provided from the U.S. Census; see Table above. Said flyers and posters will be placed in the Sacramento County Department of Transportation lobby and in other highly visible and accessible locations. The public notices will also be available for viewing on SacDOT’s website, at <https://sacdot.saccounty.gov>.

Moving forward, for all Federal-aid programs administered by SacDOT, Staff will provide a translated written notice on outreach materials of the right to receive free oral interpretation of documents in Spanish, Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic. and ensure that interpreters are readily available as necessary for any LEP Persons that would like to contribute or participate.

Limited English Proficiency Plan

In accordance with Executive Order 13166, “improving Access to Services for Persons” with Limited English Proficiency”, the Sacramento County Department of Transportation has developed an evaluation and implementation program to ensure that Limited English Proficiency (LEP) persons are provided, free of charge, meaningful access to programs, services, and information without unduly burdening the fundamental activities of the County(Exhibit D).

Environmental Justice in Minority and Low-Income Populations

In accordance with Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”, SacDOT staff will identify and address environmental effects of activities, programs, or policies on minority and low-income populations for federally funded projects, ensure nondiscrimination in Federal-aid programs substantially affecting human health and the environment, and provide minority and low-income communities access to public information and an opportunity for public participation in matters relating to human health or the environment. Staff will consider demographic data during project design and involve the public in the planning and development process to assess the environmental impacts of projects on the community. The public’s input and demographic data analysis will enable staff to develop measures to mitigate any potential adverse effects on minority and low-income populations.

Training

Every two years, SacDOT will provide Title VI training in person and/or online for all SacDOT employees. The training will be developed by the Administration section in coordination with the Title VI Coordinators. The Title VI training will cover the following areas:

- Review of SacDOT's Title VI Implementation Plan, LEP, and other relevant documents
- Language assistance services offered to the public
- Review of complaint and reporting procedures
- Where to seek guidance for Title VI questions and issues

Additionally, links to Title VI resources from Caltrans, FHWA, and other relevant agencies will be posted on SacDOT's Title VI webpage at <https://sacdot.saccounty.gov>.

Contract Documents and Agreements

Title VI Coordinators in coordination with their Title VI Liaisons will ensure that contracts and agreements for federally funded project documents contain Title VI Assurances Appendix A-E, other non-discrimination provisions, and applicable forms.

Annual Work Plan

Title VI Coordinators will annually establish and monitor program goals and maintain a Work Plan. Title VI Coordinators will ensure that training is conducted, language translation services continue to be available, public participation is optimal, and appropriate Title VI signage is posted. This also includes updating community statistics and corresponding with the Federal agency as necessary. The Annual Work Plan will guide updates to the Title VI Implementation Plan, which shall be updated annually or as needed when changes occur. The Annual Work Plan will be available upon request.

Compliance and Enforcement

Sacramento County of Transportation shall make every effort to monitor, review, and report on compliance with Title VI. If Sacramento County Department of Transportation determines after desk audit review, compliance review, or complaint investigation that a sub-recipient (e.g. contractors, vendors, consultants) or SacDOT employee is not in compliance with Title VI requirements, they will be notified in writing of the violation(s) or deficiencies and recommended corrective actions to resolve the violation(s) or deficiencies. Sub-recipients and employees found to be in noncompliance are expected to implement the corrective actions within a reasonable period of time. The Title VI Coordinator will provide assistance to ensure implementation of the corrective actions and that the violation(s) or deficiencies are sufficiently corrected.

Review of SacDOT Directives

The County's Counsel will review SacDOT policy and procedural directives for any possible Title VI implications that may impact individuals or communities protected under Title VI of the Civil Rights Act of 1964. If a directive is believed to have Title VI implications, it will be discussed with the Title VI Coordinators and Department Director as appropriate.

Exhibit A: US DOT Title VI Assurance A-E

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 Nondiscrimination in federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration, 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, national origin, age, sex, or disability 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. **Solicitation 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 Non-discrimination on the grounds of race, color, national origin, age, sex, or disability.

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 the 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 the 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 Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:

1. withholding payments to the contractor under the contract until the contractor complies; and/or
2. 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 the Recipient or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or threatened with litigation

by a subcontractor, or supplier because of such direction, the contractor may request the Recipient 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.

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 pursuant to the provisions of Assurance 4:

NOW THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the California Department of Transportation will accept title to the lands and maintain the project constructed thereon in accordance with Title 23 U.S.C., the regulations for the administration of the preceding statute, and the policies and procedures prescribed by the 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 the California Department of Transportation 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)

TO HAVE AND TO HOLD said lands and interests therein unto the California Department of Transportation 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 California Department of Transportation, its successors and assigns.

The California Department of Transportation, in consideration of the conveyance of said lands and interest 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 California Department of Transportation will use the lands and interests in lands and interest 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, Non-discrimination in 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 lands, 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 in order to make clear the purpose of Title VI.)

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 California Department of Transportation pursuant to the provisions of Assurance 7(a):

A. The (grantee, lessee, 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. 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 California Department of Transportation will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said 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 Nondiscrimination covenants, the California Department of Transportation 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 California Department of Transportation 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.)

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 the California Department of Transportation 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 furnishings of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits or, 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 of the above Non-discrimination covenants, the California Department of Transportation will have the right to terminate the (license, permits, 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 Nondiscrimination covenants, the California Department of Transportation will there upon revert to and vest in and become the absolute property of the California Department of Transportation 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.)

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:

- 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.
- 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);
- 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 CR Part 27;
- 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 U.S.C. § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- 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);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination of 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 49 C.F.R. parts 37 and 38;

- 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);
- 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;
- 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);
- 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).

Exhibit B: Notice of Rights

Your Rights Against Discrimination Under Title VI of the Civil Rights Act of 1964 and Related Non-Discriminatory Authorities

Title VI of the Civil Rights Act of 1964 provides 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 subjected to discrimination under any program or activity receiving federal financial assistance.

The following additional authorities provide protection against discrimination on the basis of sex, age, disability, religion, sexual orientation, gender identity, or any other category protected by State or Federal law:

Section 162(a) of the Federal-Aid Highway Act of 1973 (Section 324, Title 23 U.S.C.), Section 504 of the Rehabilitation Act of 1973, The Age Discrimination Act of 1975 (Section 6101-6107, Title 42 U.S.C.), The Civil Rights Restoration Act of 1987 (Public Law 200-209), Executive Order 12898 (issued February 11, 1994), Executive Order 13166 (issued August 16, 2000)

Any person who believes that they have been discriminated against may file a written complaint with the Sacramento County Department of Transportation within 180 days of the alleged discrimination. Additional information and Title VI Complaint Forms can be obtained on the Sacramento County Department of Transportation webpage, at <https://sacdot.saccounty.gov>. Title VI Complaint Forms can also be obtained at Sacramento County Department of Transportation Lobby from the Human Resources Division. To file a Title VI discrimination complaint, please use the following contact information:

Sacramento County Department of Transportation
Attn: Title VI Coordinator
Administration Office
4111 Branch Center Road
Sacramento, CA 94530

Email:TRD.Title.VI@saccounty.gov



Exhibit C: Title VI Complaint Form

Title VI is a statute provision of the Civil Rights Act of 1964. Title VI requires 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 subjected to discrimination under any program or activity receiving Federal financial assistance.” [42 U.S.C.§2000d]

If you believe you have been discriminated against because of your race, color, or national origin, you may file a written Title VI complaint within 180 days of the alleged discriminatory act(s). To do so, you may complete this form (attach additional pages, if necessary) and submit it to the Title VI Coordinator. Any person requiring a reasonable accommodation may contact the Title VI Coordinator to obtain assistance in filing a complaint. Contact information is provided at the end of this form.

Complainant Information

Name:

Mailing Address:

Telephone:

Email Address:

What is the most convenient method and time for us to contact you about this complaint?

Attorney Information

If you have an attorney representing you, please provide their contact information below.

Name:

Firm Name:

Mailing Address:

Telephone:

Email Address:

Basis of Discriminatory Action(s)

Check the box(es) for the type(s) of discrimination you allege to have experienced.

Race Color National Origin Sex Age Sexual Orientation

Religion Disability Gender Identity Other:

Date and location of alleged discriminatory action(s)

Please include the earliest and the most recent date of the alleged discrimination.

Date	Location
<input type="text"/>	<input type="text"/>

How were you discriminated against? Note: Please attach additional pages, if necessary. Describe the nature of the action, decision, or conditions of the alleged discrimination.

Explain, as clearly as possible, what happened and why you believe your protected status (basis) was a factor in the discrimination.

Include how other persons were treated differently from you.

Name(s) and title(s) of individual(s) who you believe are responsible for the discriminatory action(s):

Names of individuals (i.e., witnesses, fellow employees, supervisors, or others) that we may contact for additional information to support or clarify your complaint (please include their contact information):

The laws prohibit retaliation against anyone because they have taken action, or participated in an action, to secure rights protected by these laws. If you feel you have been retaliated against (separate from the discrimination alleged above), please explain the circumstances below. Please explain what actions you took that you believe were the basis for the allegation.

What remedy, or action, are you seeking for the alleged discrimination?

Have you filed, or do you intend to file, a charge or complaint regarding the matters raised in this complaint with any federal agency, State agency, federal court, or State court?

Yes No

If yes, check all that apply and specify:

- Federal agency:
- State agency:
- Federal court:
- State court:

Please attach additional pages, if necessary.

If you have already filed a charge or complaint, please provide the following information:

Agency/Court: Attorney Name:

Address: Firm's Name:

Date Filed: Firm's Address:

Case Number: Telephone:

Date of Trial/Hearing: Status of Case:

Please provide any additional information that you believe would assist in the investigation.

Sign and date the complaint form below. If you need additional space to provide information about this complaint, please attach the additional information to this form.

Signature of Complainant

Date

Please submit the completed form and any attachments to the Title VI Coordinator. Contact information is provided below.

Sacramento County Department of Transportation

Attn: Title VI Coordinator

Administration Office

4111 Branch Center Road

Sacramento, CA 94530

Email: TRD.Title.VI@sacounty.gov

Exhibit D: Limited English Proficiency Plan

Background

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" requires that Federal agencies work to ensure that the recipients of Federal financial assistance provide meaningful access to their Limited English Proficiency (LEP) applicants and beneficiaries.

As such, local agencies are required to ensure that Federally-funded programs and activities normally provided in English are accessible to LEP Persons. Each local agency shall perform an annual assessment to determine if modifications are needed to their programs and activities to ensure meaningful access by LEP persons. The assessment which is referred to as a "Four-Factor" analysis is based on the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered.
2. The frequency of LEP contacts.
3. The nature and importance of the programs, services, or activities provided by Sacramento County Department of Transportation.
4. The resources available for LEP persons and costs.

Sacramento County is located in the northern portion of California's Central Valley, is approximately 994-square-miles, and has a population of approximately 592,313 residents over 5 years of age within the unincorporated areas of Sacramento County (US Census: American Community Survey 2023 5-Year Estimate). Of the 592,313 residents in the unincorporated areas, approximately 32.3% speak a language other than English at home. However, as shown in the table below, only 14.5% of the population is estimated to speak English less than "very well", with no individual language-group representing more than 5 percent of the population.

Four-Factor Analysis

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered.**

As shown in Table 1 below, Unincorporated Sacramento County has approximately 592,313 residents over 5 years of age. 85,611 or 14.5% of residents in Unincorporated Sacramento County are considered LEP persons, with the majority of those LEP persons primarily speaking Spanish (4.6% of the community), Other Indo-European languages (2.8% of the community), and Russian, Polish, or other Slavic languages (2.5% of the community). Table 1 shows that no individual language-based population with limited English proficiency represented more than 5 percent of Unincorporated Sacramento County.

Table 1: English Proficiency by Language Spoken at Home for Unincorporated Sacramento County's Residents

	Population Estimate	Percent
Total	592,313	100.0%
Speak only English	401,192	67.7%
Speak English "very well"	105,510	17.8%
Speak English less than "very well"	85,611	14.5%
Spanish	27,203	4.6%
Other Indo-European languages	16,411	2.8%
Russian, Polish, or other Slavic languages	14,736	2.5%
Other Asian and Pacific Island languages	8,552	1.4%
Vietnamese	7,500	1.3%
Chinese (incl. Mandarin, Cantonese)	3,888	0.7%
Tagalog (incl. Filipino)	2,859	0.5%
Arabic	1,889	0.3%
Other and unspecified languages	1,097	0.2%
Korean	990	0.2%
German or other West Germanic languages	374	0.1%
French, Haitian, or Cajun	112	0.02%

Source: U.S. Census Bureau. "Language Spoken at Home for the Population 5 Years and Over." American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16001, 2023

2. The frequency of LEP contacts.

Sacramento County Department of Transportation's (SacDOT) experience with LEP populations has led SacDOT to focus on making efforts primarily to Spanish speaking populations, by translating vital documents, notices, and outreach materials, for example. Further, if translation or interpretation services are needed with other LEP populations, Staff will provide said translation or interpretation services in a timely manner. As shown in the table above, this experience is largely consistent with the U.S. Census Data that shows the share of the population by language spoken at home and English proficiency.

3. The nature and importance of programs, services, or activities provided by the Sacramento County Department of Transportation.

From observation provided by SacDOT staff, it is rare that translation services are requested for programs, services, or activities which are Federally-funded. Though Staff has received very few requests for translation services on Federally-funded projects, programs and services, Staff is keenly aware that approximately 14.5% of unincorporated Sacramento County's residents are LEPs and therefore it is highly likely that LEPs will be a stakeholder in all SacDOT's projects, programs and services. As such, when Staff have encountered the need for interpretation services, Staff has provided the services readily. Moreover, as mentioned, SacDOT often proactively translates outreach materials into Spanish to conduct outreach to LEP populations.

4. The Resources Available for LEP persons.

After a review of the SacDOT's currently available resources for LEP persons, SacDOT has determined that the current available resources are lacking and inconsistent. SacDOT will remedy the lack of resources, through the action plan listed below.

Current Solutions for Engaging and Assisting LEP Persons

- Website translation via integrated Google Translate drop down menu feature at the bottom of web pages
- Document and outreach translation to Spanish, Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic as-needed
- American Sign Language (ASL) Interpreters and Real Time Captioning (CART) and Braille Transcribers, Video Remote Interpreting (VRI)

Action Plan

In order to ensure compliance with Title VI, and Executive Order 13166 the following publications and services will be developed and made available for LEP person use:

- Non-Discrimination Policy Statement
 - Statement shall be printed in English, Spanish, Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic. Said statement will be posted in the SacDOT lobby in a highly visible location.
- Title VI Rights Poster
 - Posters shall be printed in English, Spanish, Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic. Said posters will be posted in the SacDOT lobby in a highly visible location, and additional copies will be available for the public to review and take.
- Title VI Complaint Form
 - Complaint forms shall be printed in English, Spanish, Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic. Said forms will be in the SacDOT lobby in a highly visible location.
- I Speak Cards
 - I Speak Cards will be produced to easily identify translation services that are accessible for English, Spanish, Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic. Said cards will be placed at all SacDOT public counters and with the other Title VI information.
- Title VI Webpage on SacDOT's Website
 - All of SacDOT's Title VI resources will be posted on SacDOT's website at the following link: <https://sacdot.saccounty.gov>.
- Future Planning and Projects
 - SacDOT will ensure that all future projects and planning documents that are federally-funded utilize outreach methods that are compliant with Title VI and other related non-discriminatory assurances.
 - Additionally, SacDOT will ensure that a translated written notice of a right to receive free oral interpretation of documents is provided in English, Spanish,

Russian, Vietnamese, Chinese, Tagalog (Filipino), and Arabic; and that interpreter services are available as necessary for any LEP Persons.

To ensure continuous compliance, SacDOT will review the Title VI Implementation Plan and Limited English Proficiency Plan regularly. As new regulations are created, SacDOT will act promptly to update the existing plans and relevant resources.