



# **City of Del Mar**

## **Title VI Implementation Plan**

Adopted May 19, 2025  
by Resolution 2025-09

## Table of Contents

I. Introduction .....	3
II. Non-Discrimination Policy Statement .....	3
III. Designation of Responsibility .....	4
IV. Public Notice.....	4
V. Grievance Procedures .....	4
VI. Grievance Form.....	4
VII. Public Participation Plan .....	5
VIII. Limited English Proficiency Program.....	6
IX. Data Collection .....	6
X. Training .....	6
XI. Annual Work Plan (Goal and Accomplishment Report) .....	6
XII. Title VI Assurances in Contract Documents and Agreements .....	7
XIII. Program Review .....	7
XIV. Dissemination of Title VI Information .....	7

## I. Introduction

The City of Del Mar (City) is a recipient and sub-recipient of financial assistance from federal aid programs. Recipients and sub-recipients of federal aid 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.” [42 U.S.C. §2000d]

Subsequently, various other statutes added prohibitions against discrimination based on gender, age, disability, or socioeconomic status. 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 statutes. This Title VI Implementation Plan describes elements of the City’s Title VI Program and provides the policy direction necessary to ensure compliance with Title VI.

## II. Non-Discrimination Policy Statement

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

This policy applies to all operations of City of Del Mar, including its contractors and anyone who acts on behalf of the City. The policy also applies to the operations of any department or agency to which the City 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, or age 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 Coordinator is 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.



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Ashley Jones, City Manager

May 19, 2025  
Date

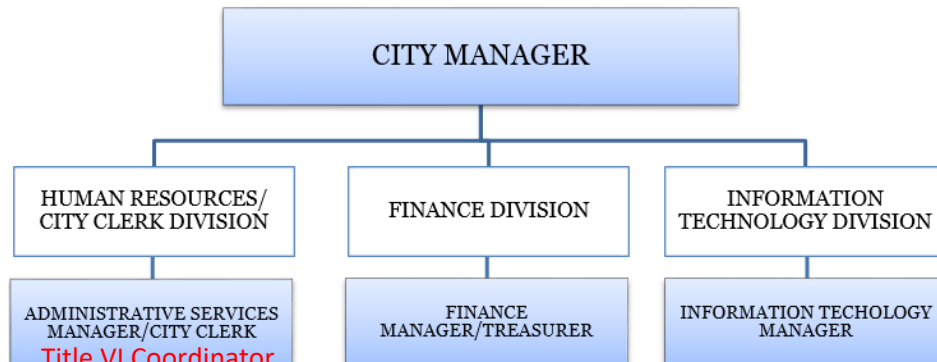
### III. Designation of Responsibility

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 CFR Part 200 and 49 CFR Part 21

The City of Del Mar has designated Administrative Services Manager/City Clerk to serve as Title VI Coordinator to oversee the City's policies and procedures:

**Sarah Krietor, Title VI Coordinator**  
**City of Del Mar**  
**Administrative Services Department**  
**1050 Camino del Mar**  
**Del Mar, CA 92014**  
[skrietor@delmar.ca.us](mailto:skrietor@delmar.ca.us)

Title VI Coordinator (Coordinator) ensures that City's Title VI program up-to-date with all requirements set forth by the Federal Highway Administration (FHWA), California Department of Transportation (Caltrans), and any other applicable jurisdictions. The Coordinator maintains an open line of communication with City Manager, City Council, and other City leadership positions necessary to facilitate the Title VI Program requirements in a timely manner. The Coordinator directs staff to coordinate and attend training, prepare required reports, create and distribute Title VI information for the public, and manage complaints per the Program's direction.



### IV. Public Notice

The Public Notice is included with this Title VI Implementation Plan as Appendix 1. The City's website has been updated to add the Title VI Public Notice, Title VI Grievance procedures and Title VI Grievance form.

### V. Grievance Procedures

Title VI grievance procedures are attached to this Implementation Plan as Appendix 2.

### VI. Grievance Form

Title VI grievance form is attached to this Implementation Plan as Appendix 3.

## VII. Public Participation Plan

The City of Del Mar has developed a Citizen Participation Plan that is an outline of the strategies by the City to engage the public in projects benefiting the community. The City encourages public input, and uses several methods to reach all groups of citizens without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Agenda notices of City meetings provide contact information for accommodation requests:

*Assistance for Persons with Disabilities: In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Administrative Services Department at 1050 Camino del Mar or by calling (858) 755-9313. Notification of at least 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting.*

### Opportunities for Public Comment

The City of Del Mar values the process through which the public along with stakeholders can gather information, encourage dialog, receive feedback and build consensus on projects to best support people equally without disproportionately adversely affecting human health or environmental impact on minority and/or low-income populations. The City solicits public participation in City Council, various Commission meetings, and special public workshop forums:

- On the City meeting agenda, time is set aside for Oral Communications at each meeting for citizens who wish to address an issue not on the agenda. This is an opportunity for the public to bring to the attention of the Council a matter or matters which do not appear on the agenda. The public can speak and address concerns on any agenda item by submitting a speaker slip to the City Clerk.
- Various Committees/Commissions/Boards meetings - The City has several commissions that conduct public meetings to gather information and thereafter make recommendations to the City Council on matters regarding services for the City programs/activities. The meetings offer Oral Communications to invite public participation in the meetings.
- Public Outreach Workshops - Workshops are noticed on the website inviting public participation. These workshops solicit public input and also solicit input from special groups.

### Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by the City of Del Mar as they relate to Title VI requirements:

- **City of Del Mar Website.** The City has a Title VI of Civil Rights Act of 1964 web page that includes: Title VI Public Notices, Title VI Complaint procedures and Title VI Complaint form.
- **City Council and various Commission Meetings Open to the Public.** The City holds public meetings on various days of the month, offering oral communication and speaker slips for the public input. The meeting dates and times are posted on the City website: <https://www.delmar.ca.us/calendar.aspx?CID=14>
- **Community Development Block Grant.** The City publishes a notice of public hearing notifying public agencies, other governmental agencies, nonprofit service providers and

other interested citizens to provide input in developing the five-year Community Development Block Program (CDBG). The proposed program is published and a public hearing conducted to solicit citizens' feedback.

- **City's Newsletter *Del Mar Weekly*.** The City published a weekly electronic newsletter informing the public of upcoming public meetings and opportunities to participate or provide feedback.

## VIII. Limited English Proficiency Program

In accordance with Executive Order 13166, "Improving Access to Services For Persons with Limited English Proficiency", the City will develop an evaluation and implementation program to ensure that Limited English Proficiency (LEP) persons who are served by federal-aid programs administered by the City are provided, free of charge, meaningful access to programs, services, and information without unduly burdening the fundamental activities of the City.

As appropriate, and absent any existing federal or State requirements, the City will conduct an LEP Needs Assessment using a Four Factor Analysis to identify the need to provide reasonable steps to ensure meaningful access by Limited English Proficiency (LEP) persons to federal-aid programs administered by the City.

## IX. Data Collection

The City will develop procedures for the collection of statistical data (race, color, and national origin) of participants in, and beneficiaries of, federally funded roadway projects, e.g., citizens impacted by relocation and participants that attended the public hearing during an environmental review. In addition, the City will analyze the data collected to determine the effectiveness of outreach methods to ensure that no group is excluded during the decision-making process or is not given an opportunity to voice their opinions or concerns.

## X. Training

The City will provide training on Title VI and its related statutes, including the Executive Order on Limited English Proficiency, for managers, supervisors and staff with frequent public contact in the administration of federal-aid programs.

The training will occur upon adoption of the Plan, every two years, and within six months of hiring a new employee. The training will be conducted by the Title VI Coordinator or their designee, online through presentations, or through training hosted by Caltrans. Additionally, links to Caltrans, FHWA, and other applicable agency resources for Title VI and related statutes will be posted on the City's website.

## XI. Annual Work Plan (Goal and Accomplishment Report)

The City will develop an annual report of Title VI accomplishments and upcoming goals, including an update to the Title VI Program that reflects organizational policy changes, and a Work Plan Outlining Title VI monitoring and review activities planned for the upcoming fiscal year. This report will be made available to the public and when requested by Caltrans.

## XII. Title VI Assurances in Contract Documents and Agreements

The City will include provisions requiring compliance with Title VI in federal-aid construction projects. The specific contract provision language to be included can be found in the Federal Highway Administration (FHWA) Form 1273.

## XIII. Program Review

The City will conduct a periodic review and assessment of the Title VI Implementation Plan and Public Participation Plan to determine the City's effectiveness in ensuring that no person shall, on the grounds of race, color, and national origin, be excluded from participation in or be denied the benefits of, or be otherwise subjected to discrimination under, any federal-aid programs or activities it administers. The City will also conduct external Title VI reviews of sub-awardees.

## XIV. Dissemination of Title VI Information

The City will develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English (determined by the LEP Assessment). The purpose of the information is to communicate information about the public's rights under Title VI.



**CITY OF DEL MAR  
TITLE VI OF THE CIVIL RIGHTS ACT OF 1964  
TITLE VI NOTICE TO THE PUBLIC**

In accordance with Title VI of the Civil Rights Act of 1964 and all related acts and statutes (Title VI), the City of Del Mar ("City") operates its programs and services without regard to race, color, national origin, sex, age or disability. Title VI and related statutes prohibits discrimination in federally assisted programs requires that no person in the United States of American shall, on the grounds of race, color, national origin, sex, age or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal Assistance.

Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Del Mar. Any such grievance must be in writing and submitted to the City's Title VI Coordinator within 60 days following the date of the alleged occurrence.

For more information on the City of Del Mar's civil rights program, and the procedures to file a complaint, please contact:

**Sarah Krietor, Title VI Coordinator**  
**City of Del Mar**  
**1050 Camino del Mar**  
**Del Mar, CA 92014**  
**(858) 375-9517**  
[skrietor@delmar.ca.us](mailto:skrietor@delmar.ca.us)

Note: Complainant has the right to file grievances directly with the appropriate State or Federal agency providing financial assistance to the City. If information is needed in another language, please contact (858) 375-9517.



**CIUDAD DE DEL MAR**  
**TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964**  
**AVISO PÚBLICO RELATIVO AL TÍTULO VI**

De conformidad con el Título VI de la Ley de Derechos Civiles de 1964 y todas las leyes y los estatutos relacionados (en adelante, "Título VI"), la Ciudad de Del Mar (en adelante, "la Ciudad") opera sus programas y servicios sin distinción de raza, color, origen nacional, sexo, edad o discapacidad. El Título VI y los estatutos relacionados prohíben la discriminación en los programas que reciben asistencia del gobierno federal, y establecen que ninguna persona en los Estados Unidos de América deberá, por motivos de raza, color, origen nacional, sexo, edad o discapacidad, ser excluida de la participación, privada de los beneficios u objeto de discriminación en ningún programa o actividad que reciba asistencia federal.

Toda persona que se considere agraviada por cualquier práctica discriminatoria ilegal en virtud del Título VI puede presentar una queja ante la Ciudad de Del Mar. Esta queja debe ser presentada por escrito a la Coordinadora del Título VI de la Ciudad dentro de los 60 días siguientes a la fecha del presunto hecho.

Para obtener más información sobre el programa de derechos civiles de la Ciudad de Del Mar, así como sobre los procedimientos para presentar una queja, comuníquese con:

**Sarah Krietor, Coordinadora del Título VI**  
**Ciudad de Del Mar**  
**1050 Camino del Mar**  
**Del Mar, CA 92014**  
**(858) 375-9517**  
[skrietor@delmar.ca.us](mailto:skrietor@delmar.ca.us)

Nota: El denunciante tiene derecho a presentar sus quejas directamente ante la agencia estatal o federal correspondiente que otorga asistencia financiera a la Ciudad. Si necesita información en otro idioma, comuníquese al (858) 375-9517.

## **CITY OF DEL MAR TITLE VI GRIEVANCE PROCEDURES TITLE VI GRIEVANCE PROCEDURES**

As a recipient of federal funds, the City of Del Mar is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a nondiscriminatory basis. This procedure describes the process for local disposition of Title VI grievances.

Any person who believes they have been discriminated against on the basis of race, color, or national origin, sex, religion, disability, or age by the City of Del Mar may file a Title VI grievance by completing and submitting the City's Title VI Grievance Form. The complaint should be in writing by completing and submitting the City's Title VI Grievance Form. The Grievance Form should be submitted by the complainant or their authorized representative as soon as possible but no later than 60 calendar days after the alleged violation to:

Sarah Krietor, Title VI Coordinator  
City of Del Mar  
Administrative Services Department  
1050 Camino del Mar  
Del Mar, CA 92014  
[skrietor@delmar.ca.us](mailto:skrietor@delmar.ca.us)

Within 15 calendar days after receipt of the complaint, the Title VI Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the Title VI Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Del Mar and offer options for substantive resolution of the complaint.

If the response by the Title VI Coordinator or their designee does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 15 calendar days after receipt of the response to the City Manager, or their designee.

Within 15 calendar days after receipt of the appeal, the City Manager or their designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the City Manager or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the Title VI Coordinator or their designee, appeals to the City Manager or their designee, and responses from these two offices will be retained by the City for at least three years.

Any complainant has the right to file grievances directly with the appropriate state or federal agency providing federal financial assistance to City.



# CITY OF DEL MAR

## TITLE VI GRIEVANCE FORM

Complainant Name (First, Last): \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

\_\_\_\_\_  
Contact Person for Complainant (If Applicable)

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

Please do not contact me personally (see *Contact Person for Complainant* information above)

1) Description of grievance and why you believe you were discriminated against: (attach additional pages if necessary):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2) Date of Alleged discrimination: \_\_\_\_\_

3) Name of party(s) involved: Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses, if applicable.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4) If the alleged incident/discrimination involved a State/Federal agency(s), list name(s):

\_\_\_\_\_  
\_\_\_\_\_

5) Please specify any location(s) related to the discrimination: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6) Please provide a complete description of the alleged problem or issue, including the date(s):

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*\*Please attach additional pages, photographs, sketches, or other information as necessary*

7) State requested remedy to your grievance/complaint: (attach additional pages if necessary)

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8) Have you previously filed a Title VI grievance with the City of Del Mar:

Yes

No

9) Have you filed this grievance with any other Federal, State or local agency, or with any other Federal or State Court? If so, state where?

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Signature and date are required below to complete this form:

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_

Within 15 calendar days after receipt of the complaint, the City will meet with the complainant to discuss the complaint and a possible resolution. Within 15 calendar days of the meeting, the City will respond in writing and explain the position of the City and offer options for resolution (See Title VI Grievance Procedures).

Please submit the completed form to:

Sarah Krietor, Title VI Coordinator  
City of Del Mar  
Administrative Services Department  
1050 Camino del Mar  
Del Mar, CA 92014  
[skrietor@delmar.ca.us](mailto:skrietor@delmar.ca.us)

**Note:** COMPLAINT CAN BE FILED VERBALLY OR IN WRITING. The City of Del Mar is a public entity and does not discriminate on the basis of race/color, national origin, sex, religion, age or disability in employment or the provisions of service. Please notify the City of Del Mar 72 hours or more prior to disability accommodations being needed.