

## Gustavus (SGT) Airport Title VI Plan

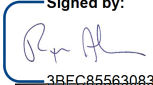
### 1. Title VI Policy Statement<sup>1</sup>

The Alaska Department of Transportation and Public Facilities (DOT&PF) assures that no person shall on the grounds of race, color, national origin (including limited English proficiency (LEP)), sex (including sexual orientation and gender identity), creed, or age, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), Section 520 of the Airport and Airway Improvement Act of 1982, and related authorities (hereafter, “Title VI and related requirements”), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives U.S. Department of Transportation (DOT) funding. Title VI also prohibits retaliation for asserting or otherwise participating in claims of discrimination.

DOT&PF further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not, *“including any programs or activities of our sub-recipients”*. The Airport Sponsor agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. Anytime communities may be impacted by programs or activities the DOT&PF will take action to involve them and the general public in the decision-making process.

DOT&PF requires nondiscrimination assurances, as prescribed by FAA, from each tenant, contractor, and concessionaire providing an activity, service, or facility at the airport. Assurances must be included in any related lease, contract, or franchise agreement between DOT&PF and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

The Title VI Coordinator is available at 907-269-0852 and [Robespierre.howard@alaska.gov](mailto:Robespierre.howard@alaska.gov). The Title VI Coordinator is responsible for overseeing the Airport Sponsor’s compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

Signed by:  
  
3BFC855630834FF...  
**Signature**  
**Ryan Anderson, P.E.**  
**Commissioner**

12/20/2024

**Effective Date**

**[Effective Date plus 3 years]**  
**3-Year Expiration Date**

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<sup>1</sup> This policy statement will be translated into languages other than English, upon request and based on patron and local language demographics.

## 2. Administration

The DOT&PF Commissioner has reviewed and adopted this Title VI Nondiscrimination Plan for The DOT&PF. This plan will be updated no less than once every 3 years. The plan will not be re-adopted following minor changes, such as updating the DOT&PF Commissioner’s Airport Director or the DOT&PF’s Title VI Coordinator. Significant revisions to our policies or federal guidelines may warrant re-adoption by the DOT&PF’s Civil Rights Office (CRO) and resubmittal to FAA.

In addition to the Coordinator and airport sponsor’s leadership, the following people also assist with our Title VI program requirements:

<b>Staff Supporting Title VI Program</b>	<b>Airport Sponsor Program / Office</b>
Robespierre Howard	ADA / Title VI Coordinator / DOT/ CRO
Jeffrey Jarvis	Airport Manager

SGT has the following airport program sub-recipients:

<b>Sub-Recipients</b>
None

As of the date of this plan, SGT has the following pending applications for Federal financial assistance:

<b>Federal Source</b>	<b>Grant Number</b>	<b>Amount</b>
AIP	3-02-0111-010-2024	\$530,632
AIP	3-02-0111-010-2024	\$194,420

In addition, SGT sub-recipients have the following pending applications for Federal financial assistance (either directly from the FAA, or passed through the State DOT):

<b>Federal Source</b>	<b>Grant Number</b>	<b>Amount</b>
None		

Updated information for pending and awarded grant applications will be available through the following methods:

<b>Federal Source</b>	<b>Grant Award Information Available at:</b>
None	

## 3. Grant and Procurement Assurances

49 CFR § 21.7 (a)(1); 49 CFR Part 21 Appendix C (b)

DOT&PF will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See [https://www.faa.gov/airports/aip/grant\\_assurances/#current-assurances](https://www.faa.gov/airports/aip/grant_assurances/#current-assurances).

## Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See [https://www.faa.gov/airports/aip/procurement/federal\\_contract\\_provisions/](https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/). Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. DOT&PF requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

### **Description of Oversight Methods for Subcontracts**

To ensure compliance with the subcontractor, the Title VI Coordinator and Airport Title VI Liaison will conduct annual reviews of 10% of all AIP-funded projects. These reviews will examine the information listed below, which will be documented in the FAA Title VI Plan's Appendices. In addition, the Alaska DOT&PF Southcoast Region Contracts section provides oversight of all Gustavus airport (SGT) project contracts, whether federally or airlines funded, including both vertical and horizontal agreements. The Contractor will ensure that paragraphs one through six of federal regulations "combined-federal-contract-provisions-2023-5-24, Section A6.4.2, Compliance with Nondiscrimination Requirements (see Appendix A)" are included in every subcontract, including material procurements and equipment leases, unless exempted by the Acts, Regulations, and associated directives.

The Contractor will take necessary action, as directed by the Recipient or the Federal Aviation Administration, to enforce these provisions, including imposing sanctions for noncompliance.

If the Contractor faces litigation from a subcontractor or supplier due to such direction, they may request the Recipient to engage in legal proceedings to protect the Recipient's interests.

Additionally, the Contractor may request that the United States participate in the litigation to safeguard the United States' interests.

## **4. Title VI Coordinator Responsibilities**

The Coordinator is responsible for ensuring that they and other staff supporting the Title VI are trained in Title VI requirements. Essential training topics include:

- Basic Title VI requirements
- Airport language assistance resources and practices
- Collecting and assessing demographic data
- Reporting Title VI complaints and other required FAA notifications.

See Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that the Airport Sponsor is in compliance with nondiscrimination requirements of Title VI and reports to DOT&PF leadership on the status of Title VI compliances.
- Responds promptly to requests by FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI and related requirements.
- Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.
- Provides the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
- Annually reviews the airport's Title VI plan and disseminates information throughout staff and the Airport Sponsor's leadership.
- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

See Notice, Compliance reviews, Audits, Lawsuits, and Other Investigations, and Complaints Sections of this Plan.

The Coordinator has requested and received access to the Title VI portion of the FAA Civil Rights Connect System (<https://faa.civilrightsconnect.com/>).

## **5. Notice**

49 CFR Part 21 Appendix C(b)(2)(ii)

SGT will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. The Coordinator ensures that these posters are visible, accessible,<sup>2</sup> and maintained. The poster template is available at

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<sup>2</sup> For more information about website accessibility, please visit ADA.gov.

[https://www.faa.gov/about/office\\_org/headquarters\\_offices/acr/com\\_civ\\_support/non\\_disc\\_pr/](https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/) and a completed copy is attached. See Section 15 Appendix.

SGT has posted the above Title VI policy statement at its staff offices.

SGT will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan is available on the DOT&PF website: <https://dot.alaska.gov/cvlrts/titlevi.shtml>.

Posters are displayed in the terminal and other areas on airport property, including the following public locations:

<b>Terminal/FBO/Concessions/ Other Locations</b>	<b>Quantity in Pre-Security Area</b>	<b>Quantity in Post-Security Area</b>	<b>Additional Quantities</b>
Notice board by front door	1		
Main Notice Board	1		
Left and Right Doors from Main Window	2		

#### Outreach to Affected Communities

The DOT&PF CRO Title VI Coordinator will ensure that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify the effective media platforms to share announcement and notices. Announcements are made in social media, general circulation newspapers, community newspapers, email broadcast, and the DOT&PF’s website. The CRO Title VI Coordinator contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities<sup>3</sup> and provide important feedback on translated materials. The CRO maintains records of all such notices and the efforts made to reach each of the Affected Communities.

DOT&PF will create a detailed Community Participation Plan (CPP) by December 30, 2024. Detailed information on our public notice, outreach procedures and a copy of the plan will be available at <https://dot.alaska.gov/cvlrts/titlevi.shtml>

To ensure that the community is effectively informed of and able to participate in public hearings, DOT&PF’s CRO includes public notices translated into appropriate languages, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such social media postings and notices will include direction for obtaining an interpreter, free of charge, for public hearings. 28 CFR § 42.405(d). See Limited English Proficiency (LEP) Section.

## 6. Community Statistics

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). By knowing this information, the CRO Title VI Coordinator will be able to identify, understand, and engage with communities. In doing so, the DOT&PF needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by DOT&PF’s airport program.

Affected Communities <sup>3</sup>	Population
City of Gustavus	710

(Hereafter, the above communities will be referred to collectively as “the Affected Communities”).

We have identified the following facts about the Affected Communities:

### Low Income Communities<sup>4</sup>

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” SGT is collecting information about affected and potentially affected low-income communities. According to the U.S. Census Report, such as S1701: Poverty Status in the Past 12 Months, the overall poverty level for the City of Gustavus is approximately 6.1%. The poverty rate remains low compared with the rest of the poverty rate remains low compared with the rest of the State of Alaska at 11.0% with MoE of +/- 0.9%. The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate
City of Gustavus	6.1%

### Racial and Ethnic Communities.

Demographic data for race, color, and national origin was evaluated to identify racial and ethnic communities and populations in each Affected Community. The demographic composition by race, color, or national origin for the specific Affected Communities are as follows<sup>5</sup>:

**Affected Community: Gustavus**  
**Total Affected Community Population: 710**

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<sup>3</sup> “Affected communities” means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.

<sup>4</sup> Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, this data will be utilized in our Community Participation Plan (CPP) to help ensure the meaningful involvement of low-income communities in airport programs and activities.

<sup>5</sup> Recommend using demographic groups from the U.S. Census.

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	650	4.8%
Black or African American	0	-
American Indian or Alaska Native	24	0.0%
Asian	0	-
Native Hawaiian or Other Pacific Islander	0	-
Hispanic or Latino	46	17.4%
More than one	36	33.3%
Some other race alone	0	-

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that SGT communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>6</sup> that are spoken in LEP households in the Affected Communities. The data source is American Community Survey.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.<sup>7</sup> The safe harbor for our community is 0.65. Please refer to the end of this document to find data for all languages in our community.

<b>Languages Spoken by LEP Population that Meet the Safe Harbor Threshold</b>	<b>Number</b>	<b>Margin of Error</b>
Tagalog (incl. Filipino)	13	+/-27

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages):

<b>Languages Spoken by LEP Persons</b>	<b>A few times a year (12 or less days a year)</b>	<b>Several times a month (13 to 51 days a year)</b>	<b>At least once a week (52 to 364 days a year)</b>	<b>Every day (365 days a year)</b>
Tagalog				

Additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, and others, include:

<sup>6</sup> Recommend using language groups from the U.S. Census and using data for the “Speak English less than ‘very well’” category for each language over the threshold.

<sup>7</sup> See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

## Additional Languages Spoken

None

This information is updated annually<sup>8</sup> through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
U.S. Census Bureau	<a href="#">B16001: LANGUAGE SPOKEN AT HOME BY ... - Census Bureau Table</a>
Local public-school data	<a href="#">Data Center - Education and Early Development (alaska.gov)</a>
U. S. Environmental Protection Agency	<a href="#">EJScreen: Environmental Justice Screening and Mapping Tool   US EPA</a>
City-Data	<a href="#">City-Data.com - Stats about all US cities - real estate, relocation info, crime, house prices, cost of living, races, home value estimator, recent sales, income, photos, schools, maps, weather, neighborhoods, and more</a>
Alaska Department of Health	<a href="#">Tribal Health Regions   Alaska Health Data Geographic Descriptions</a>

### Beneficiary Diversity.

Demographic information is collected from airport customers, attendees at community meetings, and businesses seeking opportunities at the airport, through voluntary disclosures.

#### **Description of Beneficiary Demographic Information Collection Methods**

- Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information, submitted through a data collection website.

### Staff and Advisory Board Diversity.

Demographic information is collected from airport program employees and members of planning and advisory boards, through voluntary disclosures.

#### **Description of Employee and Advisory Board Demographic Information Collection Methods**

- Employees are asked to submit voluntary confidential demographic information at time of hiring. Job applicants are asked to submit the same information when submitting their job application through the job application website.
- Every 3 years, the airport administration sends an email to all board members asking them to

<sup>8</sup> Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan's 3-year period.



voluntarily and anonymously enter demographic information through an online survey.

## 7. Potential or Known Community Impacts

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. Thus, in general, no DOT&PF activity must have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.<sup>9</sup>

The following airport facilities are already in use or under construction and expected to be in use within the next 3 years:

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
Terminal and Airfield	None

The following airport facility projects (including all alternatives) are in construction or expected to be in construction within the next 3 years:

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
Pavement Markings & Crack Seal	None
Loader	None
MB2 Plow Truck and Cradle Broom	None
Obstruction Removal	None

We have analyzed the above existing facilities and facility construction projects for disparate impacts on the basis of race, color, or national origin (including LEP) in Affected Communities. The following have disparate impacts:

Facilities or Construction Projects with Disparate Impacts	Affected Community Impacted	Impact Can Be Eliminated?
None		

**Justifications:**

Facilities or Construction	Justification
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<sup>9</sup> In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

**Projects**

None
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**8. Limited English Proficiency (LEP)**

**Executive Order 13166**

In creating a Language Assistance Plan, the DOT&PF will consider the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide.

In Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities of SGT as a whole.

**Language**

None
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DOT&PF also collects data for languages spoken by airport guests.<sup>10</sup> Data sources include:

<b>Data Sources for Languages Spoken by Airport Guests</b>	<b>Website link to Data Source</b>
None	

Based on the above data, the following additional languages have been identified as likely to be spoken by LEP airport guests:

**Language**

None
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The Title VI Coordinator will also actively engage with community educators, community groups, places of work, business groups, social groups, and the like to confirm that translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform leadership and staff of the SGT of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

**Translation Services:**

- All written notices contain a statement in the identified languages, when appropriate, of how to receive translated written materials.
- The following vendors have been identified for written translations:

<b>Translation Vendors</b>	<b>Languages</b>
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<sup>10</sup> We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language was not available beforehand, or the safe harbor threshold for written translation was not met.

Corporate Translation Services (CTS) Language Link	All above languages
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- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Alaska DOT&PF website	All above languages

**Interpretation Services:**

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Language Interpreter Center Anchorage/ Juneau Office	All above languages

- Information regarding interpretation services can be obtained at

Location for Interpretation Assistance	Languages
On-Demand Interpreting and Translation Services	<a href="#">On-Demand Interpreting and Translation Services, Office of Procurement and Property Management, State of Alaska</a>

**Description of Interpretation Assistance Processes**

- The airports operated by the Alaska Department of Transportation & Public Facilities (DOT&PF) use a combination of human staff, technology, and clear signage to offer translation services and ensure fair access to airport facilities. To address language barriers, DOT&PF uses pictograms in their wayfinding to bridge the gap between different languages. The Airport Emergency Plans include procedures to identify individuals who may require extra assistance, such as those with Limited English Proficiency (LEP), individuals with dementia or other invisible disabilities, people with visible disabilities, and unaccompanied elderly individuals and children. Staff members are available to provide language assistance by giving directions, answering questions, and offering guidance to passengers. In addition to human assistance, passengers can also use smartphone translation apps as a technology solution.
- The DOT&PF CRO understands that resources needed to provide the cost of translation services or have a certified translator in certain parts of rural Alaska might be high or non-existent. In such circumstances, the LEP person may use a friend or someone appropriate. In this circumstance, The DOT&PF CRO Title VI Specialist shall be notified when using a non-certified individual, via email [DOT.Title6@alaska.gov](mailto:DOT.Title6@alaska.gov) or phone call 907-268-0852 or 1-800-770-6236 within Alaska.

**9. Transportation**

49 Part CFR 21 Appendix C (a)(1)(ix)

In the Community Statistics section of this plan, we identified Affected Communities and provided demographic and related data for the community populations. The minority and disadvantaged community areas located within the Affected Communities are identified below. Other minority and disadvantaged community areas that are near the airport but not within Affected Communities are also identified below.

We have coordinated with Gustavus to encourage them to provide transit service access between the airport and these areas.

The following chart identifies existing and planned transit services connecting the airport employment centers with the identified minority and disadvantaged community areas.

<b>Minority and/or Disadvantaged Community Areas</b>	<b>Transit Service</b>	<b>Planned or Existing</b>
None		

**10. Minority Businesses**

49 CFR 21 Appendix C (a)(1)(x)

Bids for airport concessions and other business opportunities are solicited from area minority and woman-owned businesses through the following methods:

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
Statewide Leasing	<p>Statewide Aviation Leasing receives and processes applications for use of land at rural State-owned airports. Following internal review to decide if the application is approvable, a public notice is published listing the location to be contracted, authorized land use, length of contract and annual rent charged.</p> <p>These public notices are first posted on the State of Alaska website. Additionally, public notice flyers are physically posted in three public areas near the area to be contracted. These areas may include the local post office, shopping center, airport terminal buildings or other areas where the general public gathers. Public notices for new contracts and some applicable contract term extensions will solicit both comment and competing applications for submission. The length of public notice period is determined by the term of the contract, with contracts over 270 days in length being posted online for 30 days and physically posted in the community for 21 days.</p>

Selections are in compliance with Title VI, Part 21, and related requirements. Information on the award process and documentation for specific bid decisions is kept with DOT&PF Southcoast leasing and contracts.

## **11. Training**

New employee orientation incorporates Title VI training. Topics include:

- Title VI and related laws prohibit discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age
- Title VI complaints must be forwarded to the Coordinator
- Protections against retaliation for filing civil rights complaints or related actions
- Title VI notices must be displayed throughout the airport public facilities
- All contracts must include Title VI clauses
- Language interpretation and translation services
- Cultural and community relations sensitivity training
- Anti-harassment training

Refresher information will be provided biannually.

## **12. Compliance Reviews, Audits, Complaints, Lawsuits, and Other Investigations**

**FAA Notification.** The Coordinator will notify FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements<sup>11</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>12</sup>

As discussed in the Title VI Complaints Section, Title VI complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, SGT must notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, the Coordinator will provide FAA contacts with status updates for the investigations and reviews, until completed. For each existing investigation or review completed within 5 years of this plan, the Coordinator will also provide a statement about the outcome, unless previously provided.

## **13. Title VI Complaints**

49 CFR 21.11; 49 CFR 21 Appendix C (b)(3); 28 CFR 42.406(d)

**Scope.** These procedures are for complaints of discrimination under Title VI and related laws (hereafter “Title VI Complaints.” In order to be a Title VI Complaint, the complaint must:

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters<sup>13</sup>
3. Allege misconduct by the SGT or its sub-recipients, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the SGT including airport employees, contractors, concessionaires, lessees, or tenants.

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<sup>11</sup> Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the airport sponsor or any of its sub-recipients by any State, local or Federal agency.

<sup>12</sup> Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

<sup>13</sup> Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the DOT&PF CRO.<sup>14</sup> Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Title VI Coordinator will log in the complaint and promptly send copies of the complaint to DOT/Civil Rights Office, Office named in complaints, and the Airport Director

Complaints must be filed within 180 days of the discriminatory event, must be in writing, and must be delivered to:

Robespierre Howard, Statewide Title VI Specialist 2200 E. 42<sup>nd</sup> Ave  
Anchorage, Alaska 99508  
907-269-0852  
[Robespierre.howard@alaska.gov](mailto:Robespierre.howard@alaska.gov)

If a complaint is initially made by phone, it must be supplemented with a written complaint before 180 days after the discriminatory event has passed. If a verbal complaint is received, the complainant should be given a copy of the Airport Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.  
copy of the Airport Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

Initial Procedure. The Coordinator may meet with the complainant to clarify the issues, obtain additional information, and determine if informal resolution might be possible in lieu of an investigation. If successfully resolved, the Coordinator will issue a closure letter to the complainant, record the disposition in the complaints log, and report the resolution to FAA.

### **Discrimination Complaint Referral Procedure**

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within 72 hours.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof to the FAA Civil Rights staff. (Note: complaints based on disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will be uploaded to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from

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FAA, as needed, throughout complaint intake, investigation and resolution process.

### **Investigation Procedure**

Assignment of Investigator. The Coordinator will immediately begin the investigation or designate an investigator.

Cooperation with FAA. The Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against SGT, the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

Prompt Investigation. The Coordinator will make every effort to complete discrimination complaint investigations within 60 calendar days after the complaint is received. Some investigations may take longer with a justification for the delay and assurance that the investigation is being completed as quickly as possible.

Contact with Complainant. The Coordinator will meet with the complainant to clarify the issues and obtain additional information, and also speak with community members and potential witnesses, as appropriate.

Investigation Report. After completing the investigation, the Coordinator will prepare a written report.

Consultation with Legal Counsel. In each case, the Coordinator will consult with Legal Counsel regarding the investigation and the report. Airport Legal Counsel will ensure that the report is consistent with the DOT and FAA Title VI nondiscrimination requirements.

Prompt Resolution of Disputes. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through reasonable accommodations, alternate dispute resolution, negotiation, and/or mediation.

Forwarding Report and Response to Complainant. At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state SGT's conclusion regarding whether unlawful discrimination occurred and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

Appeal Rights. The complainant must be notified of their right to appeal the findings or determinations, and of the procedures and requirements for an appeal:

- The complainant may appeal in writing to the Airport's Director.
- The written appeal must be received within 15 business days after receipt of the written decision.



- The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal.
- The Airport Director will issue a final written decision in response to the appeal.

Avoiding Future Discrimination. In addition to taking action with respect to any specific instances of discrimination, the SGT will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. SGT employees, contractors, and tenants will not intimidate or retaliate against a person who has filed a complaint alleging discrimination.

For information on filing a complaint with DOT/FAA, please contact Robespierre Howard at 907-269-0852.

This complaint procedure is shared with the public through the following methods:

#### **Website, In-person, and Other Distribution Methods**

1 Alaska DOT&PF website, [Discrimination Complaint, Civil Rights Office, Transportation & Public Facilities, State of Alaska](#)

**14. Population / Language Data**  
**S1701 tables for your area from [www.census.gov](http://www.census.gov)**

	ZCTA5 99826					
	Total		Below poverty level		Percent below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	710	±153	43	±25	6.1%	±3.9
AGE						
Under 18 years	82	±55	0	±10	0.0%	±25.8
Under 5 years	1	±2	0	±10	0.0%	±100.0
5 to 17 years	81	±55	0	±10	0.0%	±26.1
Related children of householder under 18 years	82	±55	0	±10	0.0%	±25.8
18 to 64 years	484	±126	20	±14	4.1%	±3.2
18 to 34 years	176	±105	8	±10	4.5%	±6.5
35 to 64 years	308	±91	12	±11	3.9%	±3.8
60 years and over	190	±52	29	±19	15.3%	±10.5
65 years and over	144	±48	23	±18	16.0%	±12.6
SEX						
Male	362	±103	27	±20	7.5%	±5.8
Female	348	±85	16	±13	4.6%	±3.9
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	650	±147	31	±23	4.8%	±3.7
Black or African American alone	0	±10	0	±10	-	**
American Indian and Alaska Native alone	24	±23	0	±10	0.0%	±53.1
Asian alone	0	±10	0	±10	-	**
Native Hawaiian and Other Pacific Islander alone	0	±10	0	±10	-	**
Some other race alone	0	±10	0	±10	-	**

Two or more races	36	±20	12	±11	33.3%	±27.8
Hispanic or Latino origin (of any race)	46	±50	8	±10	17.4%	±35.1
White alone, not Hispanic or Latino	612	±131	31	±23	5.1%	±3.9
EDUCATIONAL ATTAINMENT						
Population 25 years and over	584	±127	43	±25	7.4%	±4.6
Less than high school graduate	23	±17	21	±17	91.3%	±15.1
High school graduate (includes equivalency)	123	±47	2	±3	1.6%	±2.5
Some college, associate's degree	206	±83	20	±15	9.7%	±8.3
Bachelor's degree or higher	232	±116	0	±10	0.0%	±10.2
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	473	±130	20	±15	4.2%	±3.3
Employed	452	±124	20	±15	4.4%	±3.5
Male	213	±83	8	±10	3.8%	±4.8
Female	239	±70	12	±12	5.0%	±5.0
Unemployed	21	±28	0	±10	0.0%	±56.8
Male	10	±26	0	±10	0.0%	±82.3
Female	11	±10	0	±10	0.0%	±78.4
WORK EXPERIENCE						
Population 16 years and over	643	±132	43	±25	6.7%	±4.2
Worked full-time, year-round in the past 12 months	290	±99	6	±7	2.1%	±2.6
Worked part-time or part-year in the past 12 months	216	±59	14	±13	6.5%	±6.1
Did not work	137	±34	23	±17	16.8%	±12.8
ALL INDIVIDUALS WITH INCOME						

BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	6	±8	(X)	(X)	(X)	(X)
125 percent of poverty level	59	±38	(X)	(X)	(X)	(X)
150 percent of poverty level	75	±60	(X)	(X)	(X)	(X)
185 percent of poverty level	103	±64	(X)	(X)	(X)	(X)
200 percent of poverty level	119	±64	(X)	(X)	(X)	(X)
300 percent of poverty level	326	±118	(X)	(X)	(X)	(X)
400 percent of poverty level	437	±138	(X)	(X)	(X)	(X)
500 percent of poverty level	565	±148	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	274	±118	43	±25	15.7%	±10.6
Male	169	±86	27	±20	16.0%	±12.9
Female	105	±53	16	±13	15.2%	±13.6
15 years	0	±10	0	±10	-	**
16 to 17 years	0	±10	0	±10	-	**
18 to 24 years	14	±27	0	±10	0.0%	±69.5
25 to 34 years	107	±98	8	±10	7.5%	±13.9
35 to 44 years	0	±10	0	±10	-	**
45 to 54 years	61	±52	6	±8	9.8%	±16.1
55 to 64 years	39	±21	6	±6	15.4%	±16.3
65 to 74 years	23	±14	0	±10	0.0%	±54.2
75 years and over	30	±17	23	±18	76.7%	±34.6
Mean income deficit for unrelated individuals (dollars)	4,105	±1,941	(X)	(X)	(X)	(X)

Worked full-time, year-round in the past 12 months	149	±93	6	±7	4.0%	±5.8
Worked less than full-time, year-round in the past 12 months	70	±38	14	±13	20.0%	±18.5
Did not work	55	±24	23	±17	41.8%	±28.0
Population in housing units for whom poverty status is determined	671	±143	43	±25	6.4%	±4.1

#### **14. Population / Language Data**

**B16001 tables for your area from [www.census.gov](http://www.census.gov)**

	ZCTA5 99826	
Label	Estimate	Margin of Error
Total:	489	±95
Speak only English	453	±92
Spanish or Spanish Creole:	18	±21
Speak English "very well"	18	±21
Speak English less than "very well"	0	±9
French (incl. Patois, Cajun):	4	±6
Speak English "very well"	4	±6
Speak English less than "very well"	0	±9
French Creole:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Italian:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Portuguese or Portuguese Creole:	0	±9
Speak English "very well"	0	±9

Speak English less than "very well"	0	±9
German:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Yiddish:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Other West Germanic languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Scandinavian languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Greek:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Russian:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Polish:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Serbo-Croatian:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Other Slavic languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Armenian:	0	±9
Speak English "very well"	0	±9

Speak English less than "very well"	0	±9
Persian:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Gujarati:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Hindi:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Urdu:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Other Indic languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Other Indo-European languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Chinese:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Japanese:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Korean:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Mon-Khmer, Cambodian:	0	±9
Speak English "very well"	0	±9

Speak English less than "very well"	0	±9
Hmong:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Thai:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Laotian:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Vietnamese:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Other Asian languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Tagalog:	14	±29
Speak English "very well"	1	±10
Speak English less than "very well"	13	±27
Other Pacific Island languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Navajo:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Other Native North American languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Hungarian:	0	±9
Speak English "very well"	0	±9



Speak English less than "very well"	0	±9
Arabic:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Hebrew:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
African languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9
Other and unspecified languages:	0	±9
Speak English "very well"	0	±9
Speak English less than "very well"	0	±9

## 15. Completed Unlawful Discrimination Poster

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### Unlawful Discrimination

It is unlawful for airport operators and their lessees, tenants, concessionaires and contractors to discriminate against any person because of race, color, national origin, sex, creed, or disability in public services and employment opportunities. Allegations of discrimination should be promptly reported to the Airport Manager or:

Federal Aviation Administration  
Office of Civil Rights, ACR-1  
800 Independence Avenue, S.W.  
Washington, D.C. 20591

Federal regulations on unlawful discrimination are available for review in the Airport Manager's Office.

**Coordinator:** Robespierre Howard  
**Phone:** 907-269-0852  
**Address:** 2200 E. 42nd Ave.  
Anchorage, AK 99508

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### Discriminacion Ilegal

Se prohíbe a los operadores de aeropuertos y a sus arrendatarios, inquilinos, concesionarios y contratistas discriminar contra cualquier persona por motivo de raza, color, nacionalidad de origen, sexo, creencias religiosas, impedimento físico o discapacidad en lo que respecta a servicios públicos y oportunidades de empleo. Las alegaciones de discriminación deberán ser dirigidas inmediatamente al Administrador del Aeropuerto o a:

Federal Aviation Administration  
Office of Civil Rights, ACR-1  
800 Independence Avenue, S.W.  
Washington, D.C. 20591

Los reglamentos sobre discriminación ilegal están a la disposición de los interesados para su examen en la oficina del Administrador del Aeropuerto.

**Coordinador:** Robespierre Howard  
**Teléfono:** 907-269-0852  
**Dirección:** 2200 E. 42nd Ave.  
Anchorage, AK 99508



U.S. Department of Transportation  
**Federal Aviation Administration**

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