# Sitka 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. 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.

DocuSigned by:

7/11/2024

Signature Effective Date Rvan Anderson, P.E.

Commissioner [Effective Date plus 3 years]

3-Year Expiration Date

<sup>&</sup>lt;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:

Staff Supporting Title VI	Airport Sponsor Program / Office	
Program		
Robespierre Howard	ADA/Title VI Coordinator/ DOT&PF	
	CRO	
Joseph Bea	City of Sitka Terminal Manager	
Kelly Boddy	DOT&PF Airport Manager	

SIT has the following airport program sub-recipients:

# **Sub-Recipients**

### None

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

Federal Source	Grant Number	Amount
CARES	3-02-0268-038-2023	\$5,818,549

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

Federal Source	Grant Number	Amount
None		

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

Federal Source	Grant Award Information Available at:
CARES	https://www.faa.gov/airports/cares act

# 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.

#### 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 <a href="https://www.faa.gov/airports/aip/procurement/federal\_contract\_provisions/">https://www.faa.gov/airports/aip/procurement/federal\_contract\_provisions/</a>. 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 Central Region Contracts section provides oversight of all SIT 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.

# 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 (<a href="https://faa.civilrightsconnect.com/">https://faa.civilrightsconnect.com/</a>).

# 5. Notice

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

SIT 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

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.

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

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

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre- Security Area	Quantit y in Post- Security Area	Additiona l Quantities
Terminal A	2	2	
Avis Car Rental	1		

#### Outreach to Affected Communities

DOT&PF 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 office

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

<sup>&</sup>lt;sup>3</sup> We will not subject any persons to discrimination based on race, color, national origin, age, sex, or creed. The term "protected communities" is used within this Title VI Plan to highlight the requirements of Title VI, 49 U.S.C. § 47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898.

maintains records of all such notices and the efforts made to reach each of the Affected Communities.

Detailed information on our public notice and outreach procedures is available in the SIT CPP. A copy of the CPP is available at <a href="https://dot.alaska.gov/cvlrts/titlevi.shtml">https://dot.alaska.gov/cvlrts/titlevi.shtml</a> . A copy of each CPP report completed since the last Title VI Plan is available at <a href="https://dot.alaska.gov/cvlrts/titlevi.shtml">https://dot.alaska.gov/cvlrts/titlevi.shtml</a>

DOT&PF will create a detailed CPP by July 30, 2024. A copy of the plan will be available at <a href="https://dot.alaska.gov/cvlrts/titlevi.shtml">https://dot.alaska.gov/cvlrts/titlevi.shtml</a>.

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 DOT&PF 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>4</sup>	Population	
Sitka		8,382	

(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>5</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

<sup>&</sup>lt;sup>4</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>&</sup>lt;sup>5</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.

Services poverty guidelines. Pursuant to Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," SIT uses the American Community Survey statistics on the City and Borough Juneau (CBJ) as a whole. (U.S. Census Report, report S1701: Poverty Status in the Past 12 Months), the overall poverty level for the City and Borough of Sitka is approximately11.0%. The poverty rate remains similar 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 have not been identified by specific area or Affected Communities and has only been determined by the community as a whole.

Affected Communities	Poverty Rate
Sitka	11.0%

#### **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 have not identified any specific area or Affected Communities and has only been determined by the community as a whole.

# <u>Limited English Proficiency (LEP).</u>

The goal of all language access planning and implementation is to ensure that SIT communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. In Section 14 the language data table lists non-English languages that are spoken in LEP households by the community as a whole.

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. SIT safe harbor for our community is 1000. Please refer to Section 14 Language Data: Language Spoken at Home by Ability to Speak English of this document to find data for all languages in our community. While the only data compiled for SIT is through the American Community Survey for 'spoken' English for LEP, it does not distinguish between 'written' and 'spoken' English.

Based on the language data and safe harbor threshold of 1,000 per language group, no language group exceeds the threshold for the community as a whole in SIT. There is zero frequency of contact with LEP individuals at the airport and airport-related activities (all languages).

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<sup>&</sup>lt;sup>6</sup> See the DOT LEP Policy Guidance at <a href="https://www.federalregister.gov/d/05-23972/p-133">https://www.federalregister.gov/d/05-23972/p-133</a>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages): None

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

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

**Additional Languages Spoken** 

	 991	-
None		

This information is updated annually  $^7$  through checking the following resources:

<b>Data Sources for Languages Spoken in</b>	Website link to Data Source
Affected Community	
U.S. Census Bureau	B16001: LANGUAGE SPOKEN AT HOME
	BY Census Bureau Table
Local public-school data	Data Center - Education and Early Development (alaska.gov)
U. S. Environmental Protection Agency	EJScreen: Environmental Justice Screening and Mapping Tool   US
City-Data	EPA 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,
Alaska Department of Health	weather, neighborhoods, and more Tribal Health Regions   Alaska Health Data Geographic Descriptions

<sup>&</sup>lt;sup>7</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.

# 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 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>8</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

	- F
Sitka Airport	Sitka

<sup>&</sup>lt;sup>8</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.

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

Sitka Terminal Improvement Project	Japonski Island
Seaplane Base	Sitka Tribe of Alaska Culture Camps

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: None.

<b>Facilities or Construction</b>	Affected Community	Impact Can
Projects with Disparate Impacted		Be
<b>Impacts</b>		Eliminated?
Sitka Terminal Improvement	Japonski Island	No
Project	_	
Seaplane Base	Sitka Tribe of Alaska	No
	Culture Camps	

#### **Justifications:**

The current active project is the Terminal Improvement Project, which affects the City of Sitka as outlined in the Title VI plan. An upcoming project is the construction of a new Seaplane Base, expected to commence in the Summer of 2025. This project aims to replace our current seaplane base, which is over 60 years old and has reached the end of its useful life. The new Seaplane Base will be relocated to Japonski Island across the channel, but the flight path into the landing area will remain very close to current operations.

# Facilities or Construction **Projects**

#### **Justification**

Sitka Terminal Improvement Project	
Seaplane Base	Due to the proximity of the Seaplanes, noise will increase near the Sitka Tribe of Alaska Culture Camps, which operate from the transient docks of
	Thompson and Eliason harbors during the summer, as indicated by our noise analysis. This change will impact the noise levels, although it is not a new development but rather a result of the small movement of the landing path.

# 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 the Community Statistics section, we identified that no language group exceeds the threshold for the community of SIT as a whole.

DOT&PF also collects data for languages spoken by airport guests. 9 Data sources include:

Data Sources for Languages Spoken	Website link to Data
by Airport Guests	Source
None	

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

	Language
None	

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 SIT 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:

Translation Vendors	Languages
Corporate Translation Services	All above languages
(CTS) Language Link	

• Information regarding translation services can be obtained at:

<sup>&</sup>lt;sup>9</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.

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	All above languages
Anchorage/ Juneau Office	

• Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
On-Demand Interpreting and Translation Services	On-Demand Interpreting and Translation Services, Office of Procurement and Property
	Management, State of Alaska

### **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 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 Sitka Tribe of Alaska 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.

Minority and/or Disadvantaged Community Areas	Transit Service	Planned or Existing	
Sitka Tribe	Fixed-route buses	Planned	

# 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:

Airport Business Opportunity	Minority Business Outreach Methods
None	

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 Statewide Aviation and South Coast Region Aviation Leasing.

# 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

<u>FAA Notification</u>. The Coordinator will notify FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements 10
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements 11

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, SIT 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)

<u>Scope</u>. 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 12

<sup>10</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>&</sup>lt;sup>11</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>&</sup>lt;sup>12</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.

- 3. Allege misconduct by the SIT, including airport employees, contractors, concessionaires, lessees, or tenants.
- 4. Concern an airport facility or actions by the SIT including airport employees, contractors, concessionaires, lessees, or tenants.

<u>Rights</u>. 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>13</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.

<u>Receipt of Complaint</u>. 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 Alex Peura, 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

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.

<u>Initial Procedure.</u> 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**

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

<u>Initial FAA Notification.</u> A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Title VI Coordinator was notified). The Title VI 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

13

disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will upload complaints to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Title VI Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

### **Investigation Procedure**

<u>Assignment of Investigator</u>. The Coordinator will immediately begin the investigation or designate an investigator.

<u>Cooperation with FAA</u>. 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 SIT, the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

<u>Prompt Investigation</u>. 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.

<u>Contact with Complainant.</u> 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.

<u>Investigation Report</u>. After completing the investigation, the Coordinator will prepare a written report.

<u>Consultation with Legal Counsel</u>. 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.

<u>Prompt Resolution of Disputes</u>. The Title VI 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.

<u>Forwarding Report and Response to Complainant</u>. 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 SIT'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.

<u>Appeal Rights.</u> 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 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.

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

<u>Intimidation and Retaliation Prohibited</u>. SIT 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

Alaska DOT&PF website, https://dot.alaska.gov/cvlrts

Sitka Airport Website (exploresitkaairportdesign.net)

# 14. Population / Language Data S1701

	ZCTA5 99835					
	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	8,278	±46	571	±162	6.9%	±1.9
AGE						
Under 18 years	1,643	±48	163	±81	9.9%	±4.9
Under 5 years	379	±33	35	±22	9.2%	±5.8
5 to 17 years	1,264	±32	128	±75	10.1%	±5.9
Related children of householder under 18 years	1,637	±48	157	±79	9.6%	±4.8
18 to 64 years	5,306	±64	390	±112	7.4%	±2.1
18 to 34 years	1,856	±64	164	±56	8.8%	±3.0
35 to 64 years	3,450	±77	226	±81	6.6%	±2.4
60 years and over	2,049	±95	44	±23	2.1%	±1.1
65 years and over	1,329	±47	18	±16	1.4%	±1.2
SEX						
Male	4,329	±69	243	±81	5.6%	±1.9
Female	3,949	±86	328	±117	8.3%	±2.9
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	5,152	±93	262	±116	5.1%	±2.2
Black or African American alone	54	±53	0	±15	0.0%	±35.0

American Indian and Alaska Native alone	766	±107	155	±70	20.2%	±8.2
Asian alone	667	±71	9	±10	1.3%	±1.5
Native Hawaiian and Other Pacific Islander alone	103	±87	0	±15	0.0%	±21.3
Some other race alone	84	±45	7	±8	8.3%	±9.9
Two or more races	1,452	±152	138	±63	9.5%	±4.3
Hispanic or Latino origin (of any race)	617	±19	74	±60	12.0%	±9.8
White alone, not Hispanic or Latino	4,951	±72	256	±117	5.2%	±2.3
EDUCATIONAL ATTAINMENT						
Population 25 years and over	5,984	±68	347	±106	5.8%	±1.8
Less than high school graduate	288	±79	27	±18	9.4%	±6.1
High school graduate (includes equivalency)	1,525	±165	138	±58	9.0%	±3.6
Some college, associate's degree	2,109	±192	103	±40	4.9%	±2.0
Bachelor's degree or higher	2,062	±161	79	±47	3.8%	±2.3
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	4,602	±143	241	±85	5.2%	±1.9
Employed	4,372	±175	198	±82	4.5%	±1.9
Male	2,201	±119	94	±54	4.3%	±2.5
Female	2,171	±116	104	±49	4.8%	±2.2
Unemployed	230	±78	43	±37	18.7%	±14.6

Male	115	±50	11	±9	9.6%	±8.2
Female	115	±53	32	±34	27.8%	±24.9
WORK EXPERIENCE						
Population 16 years and over	6,797	±56	417	±118	6.1%	±1.7
Worked full-time, year- round in the past 12 months	3,266	±228	39	±27	1.2%	±0.9
Worked part-time or part- year in the past 12 months	1,933	±195	216	±76	11.2%	±4.0
Did not work	1,598	±151	162	±65	10.1%	±3.5
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	279	±94	(X)	(X)	(X)	(X)
125 percent of poverty level	734	±188	(X)	(X)	(X)	(X)
150 percent of poverty level	970	±192	(X)	(X)	(X)	(X)
185 percent of poverty level	1,165	±210	(X)	(X)	(X)	(X)
200 percent of poverty level	1,395	±240	(X)	(X)	(X)	(X)
300 percent of poverty level	2,691	±314	(X)	(X)	(X)	(X)
400 percent of poverty level	4,073	±331	(X)	(X)	(X)	(X)
500 percent of poverty level	4,966	±362	(X)	(X)	(X)	(X)

UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	2,012	±205	279	±97	13.9%	±4.4
Male	1,140	±145	140	±67	12.3%	±5.5
Female	872	±98	139	±56	15.9%	±5.8
15 years	2	±3	2	±3	100.0%	±100.0
16 to 17 years	4	±7	4	±7	100.0%	±100.0
18 to 24 years	319	±85	60	±37	18.8%	±13.9
25 to 34 years	506	±89	59	±30	11.7%	±6.1
35 to 44 years	209	±74	47	±38	22.5%	±12.1
45 to 54 years	286	±101	33	±27	11.5%	±9.1
55 to 64 years	319	±84	56	±34	17.6%	±9.9
65 to 74 years	184	±55	2	±3	1.1%	±2.0
75 years and over	183	±48	16	±15	8.7%	±7.9
Mean income deficit for unrelated individuals (dollars)	8,344	±1,076	(X)	(X)	(X)	(X)
Worked full-time, year- round in the past 12 months	1,075	±175	9	±13	0.8%	±1.3
Worked less than full- time, year-round in the past 12 months	572	±123	139	±65	24.3%	±9.1
Did not work	365	±87	131	±62	35.9%	±9.6
Population in housing units for whom poverty status is determined	8,116	±52	551	±156	6.8%	±1.9

# Language Data

# City and Borough of Sitka, Alaska

# Source: American Community Survey, 2022 Language Spoken at Home by Ability to Speak English for the Population over 5 Years and Older

	ZCTA5 99835		
Label	Estimate	Margin of Error	
Total:	8,373	±20	
Speak only English	7,440	±146	
Spanish or Spanish Creole:	191	±59	
Speak English "very well"	115	±48	
Speak English less than "very well"	76	±39	
French (incl. Patois, Cajun):	10	±12	
Speak English "very well"	7	±11	
Speak English less than "very well"	3	±5	
French Creole:	0	±12	
Speak English "very well"	0	±12	
Speak English less than "very well"	0	±12	
Italian:	0	±12	
Speak English "very well"	0	±12	
Speak English less than "very well"	0	±12	
Portuguese or Portuguese Creole:	0	±12	
Speak English "very well"	0	±12	

Speak English less than "very well"	0	±12
German:	55	±31
Speak English "very well"	55	±31
Speak English less than "very well"	0	±12
Yiddish:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other West Germanic languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Scandinavian languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Greek:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Russian:	78	±66
Speak English "very well"	56	±58
Speak English less than "very well"	22	±27
Polish:	0	±12
Speak English "very well"	0	±12

Speak English less than "very well"	0	±12
Serbo-Croatian:	3	±5
Speak English "very well"	3	±5
Speak English less than "very well"	0	±12
Other Slavic languages:	6	±14
Speak English "very well"	0	±12
Speak English less than "very well"	6	±14
Armenian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Persian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Gujarati:	3	±5
Speak English "very well"	3	±5
Speak English less than "very well"	0	±12
Hindi:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Urdu:	0	±12
Speak English "very well"	0	±12

Speak English less than "very well"	0	±12
Other Indic languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other Indo-European languages:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Chinese:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Japanese:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Korean:	52	±46
Speak English "very well"	15	±19
Speak English less than "very well"	37	±43
Mon-Khmer, Cambodian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Hmong:	0	±12
Speak English "very well"	0	±12

Speak English less than "very well"	0	±12
Thai:	36	±46
Speak English "very well"	26	±40
Speak English less than "very well"	10	±12
Laotian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Vietnamese:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Other Asian languages:	24	±35
Speak English "very well"	2	±4
Speak English less than "very well"	22	±35
Tagalog:	301	±71
Speak English "very well"	120	±35
Speak English less than "very well"	181	±55
Other Pacific Island languages:	52	±33
Speak English "very well"	19	±19
Speak English less than "very well"	33	±23
Navajo:	0	±12
Speak English "very well"	0	±12

Speak English less than "very well"	0	±12
Other Native North American languages:	104	±34
Speak English "very well"	83	±36
Speak English less than "very well"	21	±18
Hungarian:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Arabic:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
Hebrew:	0	±12
Speak English "very well"	0	±12
Speak English less than "very well"	0	±12
African languages:	12	±25
Speak English "very well"	12	±25
Speak English less than "very well"	0	±12
Other and unspecified languages:	6	±7
Speak English "very well"	6	±7
Speak English less than "very well"	0	±12

# 15. Completed Unlawful Discrimination Poster

#### **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

#### **Discriminacion Ilegal**

Se prohibe 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 2-101098

# **DocuSign**

#### **Certificate Of Completion**

Envelope Id: 952393B01C864F44ADD7A29F82B35941

Subject: Complete with Docusign: Sitka\_SIT\_T6\_FAA.pdf

Source Envelope:

Document Pages: 28 Certificate Pages: 4

AutoNav: Enabled

Envelopeld Stamping: Disabled Time Zone: (UTC-09:00) Alaska

Signatures: 1 Initials: 0

Status: Completed

Envelope Originator: Winnie Cichosz PO Box 110206 Juneau, AK 99811

winnie.cichosz@alaska.gov IP Address: 136.226.57.10

#### **Record Tracking**

Status: Original

7/11/2024 11:21:33 AM

Security Appliance Status: Connected

Storage Appliance Status: Connected

Holder: Winnie Cichosz

winnie.cichosz@alaska.gov

Pool: StateLocal Pool: State of Alaska Location: DocuSign

Location: DocuSign

### **Signer Events**

Ryan Anderson

ryan.anderson@alaska.gov Alaska DOT&PF Commissioner

Security Level: Email, Account Authentication

(None)

#### Signature

DocuSigned by:

DE6B08F7F6734C7.

**Status** 

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#### **Timestamp**

Sent: 7/11/2024 11:27:39 AM Viewed: 7/11/2024 1:27:31 PM Signed: 7/11/2024 1:35:59 PM

#### **Electronic Record and Signature Disclosure:**

Accepted: 6/25/2024 8:51:55 PM

ID: 318b1f83-4734-4921-a279-8583ba12e889

Company Name: State of Alaska

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp

# **Carbon Copy Events**

DOT Commissioner's signature email

dot.co.sign@alaska.gov

Security Level: Email, Account Authentication (None)

Electronic Record and Signature Disclosure:

Not Offered via DocuSign

Rashaud Joseph

rashaud.joseph@alaska.gov

State of Alaska

Security Level: Email, Account Authentication

(None)

**Electronic Record and Signature Disclosure:** 

Accepted: 1/25/2022 7:06:12 AM

ID: 88ee8723-8390-4ed7-9cb8-07ac67212b40

Company Name: State of Alaska

Timestamp

Sent: 7/11/2024 1:36:00 PM

Sent: 7/11/2024 1:36:01 PM Viewed: 7/11/2024 1:50:21 PM **Carbon Copy Events** 

Robespierre Howard

vents

robespierre.howard@alaska.gov

Security Level: Email, Account Authentication

(None)

**Electronic Record and Signature Disclosure:** 

Not Offered via DocuSign

Status Timestamp

Sent: 7/11/2024 1:36:02 PM

Witness Events	Signature	Timestamp		
Notary Events	Signature	Timestamp		
Envelope Summary Events	Status	Timestamps		
Envelope Sent	Hashed/Encrypted	7/11/2024 11:27:40 AM		
Certified Delivered	Security Checked	7/11/2024 1:27:31 PM		
Signing Complete	Security Checked	7/11/2024 1:35:59 PM		
Completed	Security Checked	7/11/2024 1:36:02 PM		
Payment Events	Status	Timestamps		
Electronic Record and Signature Disclosure				

**COPIED** 

#### ELECTRONIC RECORD AND SIGNATURE DISCLOSURE

Please read this Electronic Records and Signature Disclosure (ERSD). It concerns your rights regarding electronically undertaking, and the conditions under which you and the State of Alaska agree to electronically undertake, the transaction to which it relates (the "TRANSACTION").

# **Consent to Electronically Undertake the TRANSACTION**

You can electronically undertake the TRANSACTION only if you confirm that you meet the following requirements by selecting the box next to "I agree to use electronic records and signature" (the "AGREE BOX"):

- 1. you can fully access and have read this ERSD;
- 2. you can fully access all of the information in the other TRANSACTION records;
- 3. you can retain all of the TRANSACTION records in a form that you will be able to fully access for later reference;
- 4. you consent to undertake the TRANSACTION electronically; and
- 5. you are authorized to undertake the TRANSACTION. (Please note that falsely undertaking the TRANSACTION may subject you to civil liabilities and penalties and/or to criminal penalties.)

If you cannot or are not willing to confirm each of these five things, do not select the AGREE BOX.

### **Withdrawing Consent**

If you select the AGREE BOX, you can withdraw your consent to electronically undertake the TRANSACTION at any time before you complete the TRANSACTION: simply do not finalize it. The only consequence of withdrawing your consent is that you will not finalize the TRANSACTION.

If you select the AGREE BOX, your consent will apply only to this TRANSACTION. You must separately consent to electronically undertake any other transaction with the State of Alaska.

#### Paper Option for Undertaking the TRANSACTION

You may undertake the TRANSACTION with the State of Alaska using paper records. (State of Alaska employees who want to undertake the TRANSACTION in paper should contact the agency responsible for the TRANSACTION.) Print the paper records on the website of the State of Alaska agency responsible for the TRANSACTION, or request them from the agency. The State of Alaska homepage is at http://alaska.gov/.

## **Copies of TRANSACTION Records**

After completing the TRANSACTION but before closing your web browser, you should download the TRANSACTION records. Or you can download the records within 30 days after

completing the TRANSACTION using the link in the DocuSign email sent to the email address you used to complete the TRANSACTION. The State of Alaska will not provide a paper copy of the TRANSACTION records as part of the TRANSACTION. Under the Alaska Public Records Act (APRA), AS 40.25.100–.295, you can request a copy from the agency responsible for the TRANSACTION, but if too much time has passed, the agency may no longer have the records when you make your request. If required under the APRA, the agency will charge a fee.

## **Required Hardware and Software**

For the minimum system requirements to electronically undertake the TRANSACTION, including accessing and thereby retaining the TRANSACTION records, visit https://support.docusign.com/guides/signer-guide-signing-system-requirements. These requirements may change. In addition, you need access to an email account.

#### How to Contact the State of Alaska

To ask a question on this ERSD or the DocuSign document generated after you complete the TRANSACTION or on using DocuSign to electronically undertake the TRANSACTION, contact the Alaska Department of Administration at either of the following addresses:

State of Alaska Department of Administration 550 West 7th Avenue Suite 1970 Anchorage, AK 99501 Reference: DocuSign

doa.commissioner@alaska.gov

Subject: DocuSign

To ask any other question on the TRANSACTION records or to update the information for contacting you electronically, contact the State of Alaska agency responsible for the TRANSACTION using the contact information in the TRANSACTION records or, if those records contain no contact information, using the contact information on the agency's website. Again, the State of Alaska homepage is at http://alaska.gov/.