# County of San Joaquin, California Department of Aviation

Airport Sponsor Title VI Plan

(July 01, 2024 – July 01, 2027)

### County of San Joaquin, California Department of Aviation Airport Sponsor Title VI Plan

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

The San Joaquin County Department of Aviation 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.

The San Joaquin County Department of Aviation 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. 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 San Joaquin County Department of Aviation will take action to involve them and the general public in the decision-making process.

The airport sponsor 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 the San Joaquin County Department of Aviation and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Jamie Viliniskas, available at (209) 468- 4700 and jviliniskas@sjgov.org, 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.

Signature

Richard J. Sokol

**Airport Director** 

July 01, 2024

Effective Date

July 01, 2027

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 San Joaquin County Board of Supervisors has reviewed and adopted this Title VI Plan for The Department of Aviation. 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 Airport Director's or Coordinator's names. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Board of Supervisors 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 Program	Airport Sponsor Program / Office		
none			

The San Joaquin County Department of Aviation has the following airport program subrecipients:

	Sub-Recipients	 
none		

As of the date of this plan, The San Joaquin County Department of Aviation has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
FAA-AIP	SCK-WPE-3-06 0250-056-2004	\$807,000.00
FAA AIP	SCK-WPE-3-06 0250-057-2004	\$612,000.00

In addition, Department of Aviation's 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:
FAA AIP	https://www.faa.gov/airports/aip/

### 3. Grant and Procurement Assurances

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

The San Joaquin County Department of Aviation will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See <a href="https://www.faa.gov/airports/aip/grant">https://www.faa.gov/airports/aip/grant</a> 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. The San Joaquin County Department of Aviation requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

"Templates are required and reviewed during every update."

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

Subcontract template must be used in all subcontracts related to the airport program. Subcontracts are audited by the Purchasing Dept. to verify they include the template language, for not less than 10 percent of airport contractors each year.

### 4. Title VI Coordinator Responsibilities

The coordinator is responsible for ensuring that they and other staff supporting 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 Airport Department 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)

The San Joaquin County Department of Aviation 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, and maintained. The poster template is available at <a href="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/</a> and a completed copy is attached. See Section 15 Appendix.

The Airport Department has posted the above Title VI policy statement at its staff offices.

4

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

The Airport Department will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by August 15, 2024, by email and at tenants meeting.

Posters are displayed in the terminal, lobby, hold-room and other areas on airport property, including the following public locations: [Poster attached.]

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
Terminal Fixed Base Operator (Atlantic)	1 1	1	

### Outreach to Affected Communities

The Title VI Coordinator ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify effective media platforms to share announcements and notices. Announcements are made in social media, general circulation newspapers, community newspapers, email broadcast, and the County Public Information Officer 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 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 Department of Aviation CPP. A copy of the CPP is available at <a href="flystockton.com">flystockton.com</a>. A copy of each CPP report completed since the last Title VI Plan is available for inspection in the airport administration office.

The San Joaquin County Department of Aviation will create a detailed CPP by September 30, 2024. A copy of the plan will be available on flystockton.com.

To ensure that the community is effectively informed of and able to participate in public hearings, the County Public Information Officer 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 directions for obtaining an interpreter, free of charge, for public hearings. 28 CFR § 42.405(d). See Limited English Proficiency (LEP) Section.

<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.

### 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 Airport Department will be able to identify, understand, and engage with communities. In doing so, the Airport Department needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by San Joaquin County's airport program.

## Affected Communities<sup>4</sup> Population Escalon 7,458 Stockton 317,818

(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 Services poverty guidelines. Pursuant to Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," the Airport Department is collecting information about affected and potentially affected low-income communities. According to Census Reporter, the overall poverty level for the San Joaquin County is approximately 12.1 %. The poverty rate remains similar compared with the rest of the region. The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate 9.5%	
Escalon		
Stockton	14.8%	

### 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>6</sup>:

<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.

<sup>&</sup>lt;sup>6</sup> Recommend using demographic groups from the U.S. Census.

Affected Community: <u>Escalon</u>
Total Affected Community Population: 7,458

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population	
White	5,699	76.41%	
Black or African American	38	0.51%	
American Indian or Alaska Native	24	0.32%	
Asian	107	1.43%	
Native Hawaiian or Other Pacific Islander	30	0.40%	
Some other race	558	7.48%	
Two or more races (multiracial)	1,002	13.44%	

Affected Community: Stockton
Total Affected Community Population: 317,818

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	111,108	34.96%
Black or African American	35,981	11.32%
American Indian or Alaska Native	2,713	0.85%
Asian	66,576	20.95%
Native Hawaiian or Other Pacific Islander	1,617	0.51%
Some other race	43,724	13.76%
Two or more races (multiracial)	56,099	17.65%

### Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that the Department of Aviation communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>7</sup> that are spoken in LEP households in the Affected Communities. The data source is Census Reporter.

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. The safe harbor for our community is Escalon-373, Stockton-1000. Please refer to the end of this document to find data for all languages in our community.

<sup>&</sup>lt;sup>7</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>&</sup>lt;sup>8</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.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
Spanish	1000	+/-100
Tagalog (incl. Filipino)	1000	+/-50

### Frequency of Interaction with LEP Persons:

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)
Spanish				X
Tagalog	X			

This information is updated annually through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
U.S. Census Bureau	https://data.census.gov/cedsci/table?q=B16001 &tid=ACSDT1Y2019.B16001

### 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

- Participants at small business workshops, pre-bid meetings, and other public meetings are
  asked to complete an anonymous survey that includes demographic information. A customer
  experience comment box/form located in the airline terminal lobby requests voluntary
  demographic information.
- Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information.

### 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 Aviation Advisory committee Demographic Information Collection Methods

• Employees are asked to submit voluntary confidential demographic information at time of hiring. Job applicants are asked to submit voluntary confidential demographic information

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

- 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 Department of Aviation 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>10</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

Airport terminal	Gender identity other than Male/Female	
T-Hangars	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

Airport terminal	Gender identity other than Male/Female	
T-Hangars	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?
Airport terminal	Escalon and Stockton	Yes, modify restrooms

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

#### Justifications:

### Facilities or Construction Projects

#### Justification

### 8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the Department of Aviation 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 [copy and paste from above; insert the languages that met the safe harbor threshold and languages that are frequently encountered]:

	Language	
Spanish		

The San Joaquin County Department of Aviation also collects data for languages spoken by airport guests.<sup>11</sup> Data sources include:

Data Sources for Languages Spoken by	Website link to Data	
Airport Guests	Source	
Airport language line usage data	www.languageline.com	

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 the leadership and staff of the Department of Aviation of the responsibility to provide language access. We have made the following plans to provide translation services free of

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

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	
Cal Interpreting & Translation	All above languages	
Health Care Interpreter Network	All above languages	
Language Line	All above languages	

• Information regarding translation services can be obtained at:

<b>Location for Translation Assistance</b>	Languages
Airport website request form	All above languages
In person airport office	All above languages

#### **Interpretation Services:**

• The following vendors have been identified for interpretation services:

<b>Interpretation Vendors</b>	Languages	
Cal Interpreting & Translation	All above languages	
Health Care Interpreter Network	All above languages	
Language Line	All above languages	

• Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport Language Assistance webpage	All above languages
In person airport office	All above languages

### **Description of Interpretation Assistance Processes**

- Airport office maintains a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient to provide interpretation and/or translation services. The list is updated annually. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation, during normal business hours.
- The airport contracts with the Language Line, Inc. to provide on-demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process is used: Airport information desk staff use I-Speak cards to identify the language spoken by the airport guest. Staff contacts Language Line, Inc. and "parks" the request in the queue for the appropriate language. Language Line, Inc. operators will coordinate connect the requesting party to an interpreter for the duration of the call. The

### 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 San Joaquin Council of Governments 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
Stockton	Paratransit vans	Planned
Escalon	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:

Airport Business	
Concessions	Stockton Chamber of Commerce/Airport Trade Associations
Construction	Construction Trade Associations (depending upon specialty)

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 the County Purchasing Department.

### 11. Training

New employee orientation, for both County employees and tenants, 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 annually.

### 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<sup>12</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>13</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, Airport Sponsor 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:

<sup>&</sup>lt;sup>12</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>13</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.

- 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>14</sup>
- 3. Allege misconduct by the Airport Sponsor, including airport employees, contractors, concessionaires, lessees, or tenants.
- 4. Concern an airport facility or actions by the Airport Sponsor 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 Airport Sponsor. <sup>15</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 coordinator will log in the complaint and promptly send copies of the complaint to the Airport Director, office named in the complaint and the CAO Analyst.

Complaints must be filed within 60 days of the discriminatory event, must be in writing, and must be delivered to:

Jamie Vilinskas, Marketing and Business Development Administrator

Address: 5000 S Airport Way, Suite 202 Stockton CA 95206

Phone: (209) 468- 4700

Email: jviliniskas@sjgov.org

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 for individuals unable to file a written complaint due to their 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.

14

<sup>&</sup>lt;sup>14</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.

### **Discrimination Complaint Referral Procedure**

<u>Internal Complaint Referral</u>. All Title VI complaints must be promptly forwarded to the coordinator within 24 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 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. The 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 the Department of Aviation, 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 five 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 coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through dispute resolution 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 the Department of Aviation'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 30 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 Department of Aviation will identify and implement measures to reduce the chances of similar discrimination in the future.

<u>Intimidation and Retaliation Prohibited</u>. Department of Aviation 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 the Airport Deputy Director.

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

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

1 flystockton.com, Title VI page at www.localairport.gov/civilrights

14. Population / Language Data
[Insert the full B16001 and S1701 tables for your area from www.census.gov]

### Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over



Note: This is a modified view of the original table produced by the U.S. Census Bureau. This download or printed version may have missing information from the original table.

#### San Joaquin County, California

Label	Estimate	. Margin of
✓ Total:	742,018	
Speak only English	419,931	±
✓ Spanish:	206,877	d d
Speak English "very well"	123,431	d .
Speak English less than "very well"	83,446	1
French (incl. Cajun):	1,080	
Speak English "very well"	1,028	
Speak English less than "very well"	52	
➤ Haltian:	0	
Speak English "very well"	0	
Speak English less than "very well"	0	
✓ Italian:	857	
Speak English "very well"	555	
Speak English less than "very well"	302	
➤ Portuguese:	2,166	
Speak English "very well"	1,881	
Speak English less than "very well"	285	
✓ German:	675	
Speak English "very well"	612	
Speak English less than "very well"	63	
Yiddish, Pennsylvania Dutch or other West Germanic languages:	141	
Speak English "very well"	141	
Speak English less than "very well"	0	
✓ Greek:	863	
Speak English "very well"	548	
Speak English less than "very well"	315	
✓ Russian:	944	
Speak English "very well"	518	

### POVERTY STATUS IN THE PAST 12 MONTHS

Less than high school graduate



Note: This is a modified view of the original table produced by the U.S. Census Bureau. This download or printed version may have missing information from the original table.

#### San Joaquin County, California

Label	Total	
	Estimate	Margin of Error
▼ Population for whom poverty status is determined	773,063	±2,799
✓ AGE		
✓ Under 18 years	206,239	±1,748
Under 5 years	50,731	±1,203
5 to 17 years	155,508	±1,348
Related children of householder under 18 years	205,239	±2,051
▼ 18 to 64 years	465,263	±2,257
18 to 34 years	178,248	±1,585
35 to 64 years	287,015	±1,274
60 years and over	146,873	±3,135
65 years and over	101,561	±738
<b>✓</b> SEX		
Male	385,916	±2,293
Female	387,147	±1,759
▼ RACE AND HISPANIC OR LATINO ORIGIN		
White alone	241,956	±5,339
Black or African American alone	49,119	±3,178
American Indian and Alaska Native alone	10,220	±3,352
Asian alone	145,168	±5,015
Native Hawaiian and Other Pacific Islander alone	5,618	±716
Some other race alone	146,619	±10,370
Two or more races	174,363	±10,597
Hispanic or Latino origin (of any race)	333,694	±1,713
White alone, not Hispanic or Latino	213,508	±2,239
▼ EDUCATIONAL ATTAINMENT		
✓ Population 25 years and over	496,996	±1,872
	22.22	1766 3676000

101.803

±6.230

### 15. Completed Unlawful Discrimination Poster

https://www.faa.gov/about/office org/headquarters offices/acr/com civ supp ort/non disc pr/

#### **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: Jamie Vilinskas, Marketing and Business Dev. Admin.

Phone: 209-468-4700

Address: 5000 S. Airport Way, STE 202

Stockton, CA 95206 jvilinskas@sjgov.org

### 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 fisico 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: Jamie Vilinskas, Marketing and Business Dev. Admin.

Teléfono: 209-468-4700

Dirección: 5000 S. Airport Way, STE 202

Stockton, CA 95206 jvilinskas@sjgov.org



U.S. Department of Transportation Federal Aviation Administration