



## Monterey Peninsula Airport District Title VI Plan

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

**Monterey Peninsula Airport District (hereinafter referred to as “Airport”)** as owner and operator of the **Monterey Regional Airport** 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 Airport 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 agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the Airport. The Airport will take action to involve communities that may be impacted by programs or activities under the control of the Airport of the decision-making process.

The Airport 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 Airport and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Chris Morello, Deputy Executive Director available at 831-648-7000 and [planning@montereyairport.com](mailto:planning@montereyairport.com), 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*  
**Michael La Pier, AAE**  
**Executive Director**

03/04/2024

**Effective Date**

03/03/2027

**3-Year Expiration Date**

<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 Airport Board will have been briefed on the Plan and will adopt the Title VI Policy Statement upon signature. 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 Executive Director or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant a briefing to the Airport Board of Directors and resubmittal to FAA.

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

<b>Staff Supporting Title VI Program</b>	<b>Airport Sponsor Program / Office</b>
Dan Johanson	Project Manager
Brian Roth	Project Manager
Whitney Robare	Deputy Director of Operations/Maintenance

### **Sub-Recipients**

None
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As of the date of this plan, the Airport has the following pending applications for Federal financial assistance:

<b>Federal Source</b>	<b>Grant Number</b>	<b>Amount</b>
FAA Bipartisan Infrastructure Law AIG	CFDA 20.106	\$ 3,664,550
FAA Airport Improvement Program	CFDA 20.106	\$18,849,831

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

<b>Federal Source</b>	<b>Grant Award Information Available at:</b>
<i>FAA AIP</i>	<i><a href="https://www.faa.gov/airports/aip/">https://www.faa.gov/airports/aip/</a></i>

## 3. Grant and Procurement Assurances

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

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

### Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See

[https://www.faa.gov/Airports/aip/procurement/federal\\_contract\\_provisions/](https://www.faa.gov/Airports/aip/procurement/federal_contract_provisions/). Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.

b. The Airport requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

c.

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

- a) All contracts, leases, deeds, licenses, permits or other similar instruments, not only those resulting from the first grant, but in all instruments from that point on, contain the contractual requirements and clauses outlined in attachments one and two of the standard DOT Title VI Assurance.
- b) 3% of subcontracts are reviewed annually for the Title VI clause requirements.
- c) The general Civil Rights Provision is inserted into all contractor, tenant, concessionaire, and lessee agreements. Further Monterey Regional Airport requires this provision to be included in all solicitations, contracts, subcontracts, subleases and other agreements at any tier.
- d) Templates must be used in all contracts and subcontracts related to the airport program. These contracts are reviewed and approved by the Airport Executive Director.

### **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 Airport 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 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)(i)

The Airport **does** 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/](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.

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

The Airport will distributed this Title VI Plan among its employees and Airport contractors, concessionaires, lessees, and tenants. This plan will be distributed within two weeks of the signed and approved plan via email with a direct link to the new policy which will be posted on MRY website at <https://montereyairport.specialdistrict.org/title-vi-policy> where it is available to

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

airport staff, airport tenants and airport patrons.

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

<b>Terminal/FBO/Concessions/ Other Locations</b>	<b>Quantity in Pre-Security Area</b>	<b>Quantity in Post-Security Area</b>	<b>Additional Quantities</b>
Terminal	2	4	
Rent-a-Car counters	5		1
Restaurant	1	1	1
Fixed Based Operators	2		

#### Outreach to Affected Communities

The Monterey Regional Airport Executive Team ensures 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 on the Airport District website and as necessary in social media, general circulation newspapers, community newspapers, email broadcast, press releases, and outreach events. The Title VI coordinator along with supporting staff throughout the airport contact leaders and representatives in Affected Communities directly to confirm the 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.

The Airport will create a detailed CPP by February 28,2024. A copy of the plan will be available at <https://montereyAirport.specialdistrict.org/title-vi-policy>

To ensure that the community is effectively informed of and able to participate in public hearings, Airport Executive Team include public notices on the District website that can be translated into appropriate languages when requested, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Additionally 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.

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<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 will be able to identify, understand, and engage with communities. In doing so, the Airport needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by Airport’s program.

<b>Affected Communities<sup>4</sup></b>	<b>Population</b>
District 1 Cities of Seaside/Sand City CA	18,020
District 2 City of Del Rey Oaks, Portions of City of Monterey, and Unincorporated Monterey County CA	18,016
District 3 Portions of Cities of Monterey and Pacific Grove CA	17,636
District 4 Portions of City of Pacific Grove CA	17,686
District 5 City of Carmel by the Sea, Pebble Beach, and Portions of Unincorporated Monterey County CA	16,509

(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 is collecting information about affected and potentially affected low-income communities. According to *2020 U.S. Bureau of Census* the overall poverty level for the District is approximately 13.0 %. The poverty rate remains slightly higher than compared with the overall poverty level for the State of California which is approximately 12.3%. The poverty rates for the specific Affected Communities are as follows:

<b>Affected Communities</b>	<b>Poverty Rate</b>
District 1 Cities of Seaside/Sand City CA	18%
District 2 City of Del Rey Oaks, Portions of City of	14%

<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>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.

Monterey, and Unincorporated Monterey County CA	
District 3 Portions of Cities of Monterey and Pacific Grove CA	13%
District 4 Portions of City of Pacific Grove CA	12%
District 5 Cities of Carmel by the Sea, Pebble Beach, and Portions of Unincorporated Monterey County CA	9%

Source: US Bureau of Census, American Community Survey (ACS), 1-year estimates, Table B17001

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>:

**Affected Community: District 1 -Cities of Seaside and Sand City CA**

**Total Affected Community Population: 18,020**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	3,964	22%
Black or African American	1,081	6%
Asian	1,802	10%
Hispanic or Latino	10,271	57.1%
Some Other Race	901	4.9%

**Affected Community: District 2 City of Del Rey Oaks, Portions of City of Monterey, and Unincorporated Monterey County CA**

**Total Affected Community Population: 18,016**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	8,648	48%
Black or African American	901	5%
Asian	1,802	10%
Hispanic or Latino	5,584	31%
Some Other Race	1,081	6%

**Affected Community: District 3 Portions of Cities of Monterey and Pacific Grove CA**

**Total Affected Community Population: 17,636**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
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<sup>6</sup> Recommend using demographic groups from the U.S. Census.

White	11,816	67%
Black or African American	529	3%
Asian	1,587	9%
Hispanic or Latino	2,822	16%
Some Other Race	882	5%

**Affected Community: District 4 Portions of City of Pacific Grove CA**  
**Total Affected Community Population: 17,686**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	12,203	69%
Black or African American	531	3%
Asian	1,592	9%
Hispanic or Latino	2,476	14%
Some Other Race	884	5%

**Affected Community: District 5 Cities of Carmel by the Sea, Pebble Beach, and Portions of Unincorporated Monterey County CA**  
**Total Affected Community Population: 16,509**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	12,877	78%
Black or African American	330	2%
Asian	1,651	10%
Hispanic or Latino	1,156	7%
Some Other Race	495	3%

Source: US Bureau of Census, American Community Survey (ACS), 1-year estimates

**Limited English Proficiency (LEP).**

The goal of all language access planning and implementation is to ensure that the Airport 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. Source: US Bureau of Census, 2022 American Community Survey (ACS), 1-year estimates, B16001 for Monterey County

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.<sup>8</sup> The safe harbor for our community is 1,000.

<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>8</sup> See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.



<b>Languages Spoken by LEP Population that Meet the Safe Harbor Threshold</b>	<b>Number</b>	<b>Margin of Error</b>
Spanish	103,580	+/- 2,662
Korean	1,176	+/- 261
Vietnamese	1,303	+/- 349
Tagalog	2,201	+/- 395

Please refer to the next page of this document to find data for all languages in our community. US Bureau of Census, 2022 American Community Survey (ACS), 1-year estimates Table B16001 for Monterey County: Language Spoken at Home by Ability to Speak English]

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

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

This information is updated annually<sup>9</sup> through checking the following resources:

<b>Data Sources for Languages Spoken in Affected Community</b>	<b>Website link to Data Source</b>
<i>U.S. Census Bureau</i>	<i><a href="https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001">https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001</a></i>

### 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**

- Airport Administration Office offers the opportunity for Airport terminal guests to provide online customer satisfaction comments at any time during their visit to the Airport related to any elements and services offered by the Airport. The survey includes a voluntary request for demographic information.

<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.

- Participants at small business workshops, pre-bid meetings, and other public meetings are provided the opportunity to complete an anonymous survey that includes demographic information.
- Businesses that submit bids or offers are asked to provide business owner 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 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.
- Airport Board members (advisory board) are asked to submit voluntarily confidential demographic information in their applications.

**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 Monterey Peninsula Airport District 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:

<b>Existing Airport Facilities</b>	<b>Affected Community Impacted by Operation of the Facility</b>
Aircraft Rescue and Fire Fighting Facility	None
Commercial Apron Construction	None

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

<b>Airport Facility Construction Projects</b>	<b>Affected Community Impacted by</b>
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<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.

### Construction of the Facility

Relocated Terminal Building Complex Construction	None
Runway 28L 10R Repair and Treatment	None

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

The following have disparate impacts:

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

## 8. Limited English Proficiency (LEP)

### Executive Order 13166

In creating a Language Assistance Plan, the Airport 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:

Language
Spanish
Tagalog
Vietnamese
Korean

Monterey Peninsula Airport District also collects data for languages spoken by Airport guests.<sup>11</sup> Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
Airport Customer Survey	<a href="https://www.montereyairport.com/pod/we-want-your-feedback">https://www.montereyairport.com/pod/we-want-your-feedback</a>
Assistance requests to Airport information desks	N/A

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

Language

<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.

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 Airport of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the Airport:

**Translation Services:**

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

<b>Translation Vendors</b>	<b>Languages</b>
Multilingual employees	Spanish
Language Line Solutions	All above languages

- Information regarding translation services can be obtained at:

<b>Location for Translation Assistance</b>	<b>Languages</b>
Airport website request form	All above languages
Airport Administration and Operations Department	Spanish

**Interpretation Services:**

- The following vendors have been identified for interpretation services:

<b>Interpretation Vendors</b>	<b>Languages</b>
Language Line Solutions	All above languages

- Information regarding interpretation services can be obtained at:

<b>Location for Interpretation Assistance</b>	<b>Languages</b>
Airport website request form	All above languages
Airport Administration and Operations Department	Spanish

**Description of Interpretation Assistance Processes**

- Airport Administration 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 and provided to all Airport employees. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation, during terminal building hours of operation.

## **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 the transit authority Monterey Salinas Transit to encourage them to provide transit service access between the Airport and these areas.

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

<b>Minority and/or Disadvantaged Community Areas</b>	<b>Transit Service</b>	<b>Planned or Existing</b>
District 1	Monterey-Salinas Transit fixed route	Existing
District 2	Monterey-Salinas Transit fixed route	Existing
District 3	Monterey-Salinas Transit fixed route	Existing
District 4	Monterey-Salinas Transit fixed route	Existing
District 5	Monterey Salinas Transit fixed route	Existing

## **10. Minority Businesses**

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

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

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
All projects Concession, Professional Services and Construction)	The Airport uses a variety of methods to advertise opportunities that includes: through all minority and woman owned business outreach email lists, legal posting in the Monterey Herald, on the airport website and sent to partnering organizations such as SWAAE, AAAE, ACI-NA for posting on their media outlets. Annually the Airport solicits for businesses to be added to a Qualified Contractors list that is then used as an eblast for solicitation of business opportunities.

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 Monterey Regional Airport Planning Department.

## **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 annually.

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

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

- Compliance reviews or audits concerning civil rights requirements<sup>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, the Airport must notify FAA contacts of any new investigations prior to grant execution.

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

### **13. Title VI Complaints**

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

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

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters<sup>14</sup>
3. Allege misconduct by the Airport including Airport employees, contractors, concessionaires, lessees, or tenants.
4. Concerns of an Airport facility or actions by the Airport including Airport employees, contractors, concessionaires, lessees, or tenants.

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<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>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.

<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.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the Airport<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.

Receipt of Complaint. The Coordinator will log the complaint and promptly send copies of the complaint to Executive Director along with appropriate Senior staff and the office directly involved in the complaint. If the complaint is tenant or tenant related then the property management team will be involved to coordinate and help manage the final solution.

Complaints must be filed within **90** days of the discriminatory event, must be in writing, and must be delivered to:

Chris Morello, Deputy Executive Director  
200 Fred Kane Drive, Suite 200  
Monterey, CA 93940  
831-648-7000 [planning@montereyairport.com](mailto:planning@montereyairport.com)

If a complaint is initially made by phone, it must be supplemented with a written complaint before **90** days after the discriminatory event has passed. If a verbal complaint is received, the complainant will be directed to the Airport website for the Airport Discrimination Complaint Procedures and instructed to submit a written complaint that can be done online at <https://montereyairport.specialdistrict.org/title-vi-complaint-form>. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

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

### **Discrimination Complaint Referral Procedure**

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within 48 hours.

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

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## **Investigation Procedure**

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

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

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

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

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

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

Prompt Resolution of Disputes. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through our normal resolution process. After completing the investigation, the investigator will prepare a written report. Corrective action, if necessary, can be managed through necessary staff supervising the tenant/staff that caused this issued to ensure corrective measures are taken. This could be training or reprimand to ensure the severity of the problem is understood by those involved. If the incident involves a tenant, then the property management team will continue to monitor the ongoing resolution. If unique circumstances or serious cases arise from the investigation FAA will be consulted for additional advice.

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

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

- The complainant may appeal in writing to the Airport’s Executive Director.
- The written appeal must be received within 10 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 Executive Director will issue a final written decision in response to the appeal.

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

Intimidation and Retaliation Prohibited. The Airport 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 Chris Morello.

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

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

Airport website, Title VI page at <https://montereyairport.specialdistrict.org/title-vi-complaint-form>

<https://montereyairport.specialdistrict.org/title-vi-policy>

Individually if a comment is provided to the Airport through the customer survey option that the Airport has posted throughout the facility or if the complainant provides comment in person to Airport Administration Office.

Table: B16001

**14. Population / Language Data**

	Monterey County, California	
Label	Estimate	Margin of Error
<b>Total:</b>	<b>395,093</b>	<b>±109</b>
<b>Speak only English</b>	<b>183,231</b>	<b>±2,356</b>
Spanish or Spanish Creole:	185,326	±2,159
<b>Speak English less than "very well"</b>	<b>103,580</b>	<b>±2,662</b>
French (incl. Patois, Cajun):	1,041	±277
Speak English less than "very well"	<b>90</b>	±50
French Creole:	47	±40
Speak English less than "very well"	<b>0</b>	±28
Italian:	1,003	±295
Speak English less than "very well"	<b>306</b>	±127
Portuguese or Portuguese Creole:	803	±254
Speak English less than "very well"	<b>220</b>	±114
German:	1,344	±295
Speak English less than "very well"	<b>170</b>	±97
Other West Germanic languages:	154	±89
Speak English less than "very well"	<b>26</b>	±27
Scandinavian languages:	259	±143
Speak English less than "very well"	<b>16</b>	±24
Greek:	132	±59
Speak English less than "very well"	<b>8</b>	±13
Russian:	637	±193
Speak English less than "very well"	<b>205</b>	±108
Polish:	122	±68
Speak English less than "very well"	<b>4</b>	±6
Serbo-Croatian:	70	±66
Speak English less than "very well"	<b>18</b>	±18
Other Slavic languages:	240	±101
Speak English less than "very well"	<b>110</b>	±73
Armenian:	149	±168
Speak English less than "very well"	<b>36</b>	±53
Persian:	410	±179
Speak English less than "very well"	<b>149</b>	±103
Gujarati:	242	±136
Speak English less than "very well"	<b>107</b>	±93
Hindi:	586	±203
Speak English less than "very well"	<b>145</b>	±83
Urdu:	144	±106

Speak English less than "very well"	<b>35</b>	±31
Other Indic languages:	715	±306
Speak English less than "very well"	<b>230</b>	±144
Other Indo-European languages:	336	±130
Speak English less than "very well"	<b>122</b>	±87
Chinese:	1,786	±401
Speak English less than "very well"	<b>851</b>	±235
Japanese:	1,462	±297
Speak English less than "very well"	<b>627</b>	±148
Korean:	1,923	±386
Speak English less than "very well"	<b>1,176</b>	±261
Mon-Khmer, Cambodian:	183	±115
Speak English less than "very well"	<b>157</b>	±107
Hmong:	111	±107
Speak English less than "very well"	<b>94</b>	±106
Thai:	309	±138
Speak English less than "very well"	<b>111</b>	±97
Laotian:	40	±47
Speak English less than "very well"	<b>0</b>	±28
Vietnamese:	1,932	±507
Speak English less than "very well"	<b>1,303</b>	±349
Other Asian languages:	606	±227
Speak English less than "very well"	<b>125</b>	±67
Tagalog:	5,513	±624
Speak English less than "very well"	<b>2,201</b>	±395
Other Pacific Island languages:	1,254	±248
Speak English less than "very well"	<b>430</b>	±140
Other Native North American languages:	69	±48
Speak English less than "very well"	<b>0</b>	±28
Arabic:	2,034	±556
Speak English less than "very well"	<b>685</b>	±319
Hebrew:	125	±139
Speak English less than "very well"	<b>8</b>	±14
African languages:	127	±53
Speak English less than "very well"	<b>22</b>	±33
Other and unspecified languages:	628	±356
Speak English less than "very well"	<b>572</b>	±353

SOURCE: data.census.gov | Measuring America's People, Places, and Economy

Table S1701

	Monterey County, California					
	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	414,076	±955	49,826	±5,841	12.0%	±1.4
AGE						
Under 18 years	108,050	±825	18,266	±4,057	16.9%	±3.8
Under 5 years	27,782	±667	4,788	±1,599	17.2%	±5.7
5 to 17 years	80,268	±759	13,478	±3,133	16.8%	±3.9
Related children of householder under 18 years	107,895	±848	18,111	±4,051	16.8%	±3.8
18 to 64 years	241,129	±856	25,900	±2,749	10.7%	±1.1
18 to 34 years	90,591	±941	10,060	±1,774	11.1%	±1.9
35 to 64 years	150,538	±859	15,840	±2,120	10.5%	±1.4
60 years and over	86,385	±1,950	7,823	±1,598	9.1%	±1.8
65 years and over	64,897	±548	5,660	±1,264	8.7%	±2.0
SEX						
Male	205,359	±1,310	22,163	±2,975	10.8%	±1.4
Female	208,717	±1,162	27,663	±3,585	13.3%	±1.7
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	130,701	±4,255	9,444	±2,047	7.2%	±1.5
Black or African American alone	N	N	N	N	N	N
American Indian and Alaska Native alone	N	N	N	N	N	N
Asian alone	23,086	±1,624	2,357	±1,061	10.2%	±4.4
Native Hawaiian and Other Pacific Islander alone	N	N	N	N	N	N
Some other race alone	192,543	±7,403	32,226	±5,612	16.7%	±2.8
Two or more races	57,310	±6,478	4,232	±1,331	7.4%	±2.4
Hispanic or Latino origin (of any race)	256,542	±1,066	38,828	±5,825	15.1%	±2.3
White alone, not Hispanic or Latino	111,590	±1,302	6,720	±1,287	6.0%	±1.1
EDUCATIONAL ATTAINMENT						

Population 25 years and over	269,038	±851	27,539	±2,948	10.2%	±1.1
Less than high school graduate	73,040	±3,973	12,168	±1,990	16.7%	±2.7
High school graduate (includes equivalency)	55,638	±3,676	7,350	±1,560	13.2%	±2.6
Some college, associate's degree	65,117	±4,453	4,444	±1,112	6.8%	±1.8
Bachelor's degree or higher	75,243	±4,102	3,577	±769	4.8%	±1.0
<b>EMPLOYMENT STATUS</b>						
Civilian labor force						
16 years and over	187,612	±4,371	8,560	±1,680	4.6%	±0.9
Employed	178,912	±4,713	6,984	±1,493	3.9%	±0.8
Male	95,234	±2,918	2,746	±858	2.9%	±0.9
Female	83,678	±3,166	4,238	±1,078	5.1%	±1.3
Unemployed	8,700	±1,615	1,576	±538	18.1%	±6.5
Male	4,654	±1,278	756	±450	16.2%	±9.2
Female	4,046	±1,119	820	±526	20.3%	±12.0
<b>WORK EXPERIENCE</b>						
Population 16 years and over						
317,616	±1,319	32,965	±3,415	10.4%	±1.1	
Worked full-time, year-round in the past 12 months	120,809	±5,771	1,753	±720	1.5%	±0.6
Worked part-time or part-year in the past 12 months	85,791	±5,379	10,924	±1,927	12.7%	±2.2
Did not work	111,016	±3,898	20,288	±2,812	18.3%	±2.3
<b>ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS</b>						
50 percent of poverty level	22,874	±4,591	(X)	(X)	(X)	(X)
125 percent of poverty level	71,766	±7,584	(X)	(X)	(X)	(X)
150 percent of poverty level	91,310	±8,827	(X)	(X)	(X)	(X)
185 percent of poverty level	123,588	±9,553	(X)	(X)	(X)	(X)
200 percent of poverty level	138,378	±9,501	(X)	(X)	(X)	(X)
300 percent of poverty level	203,754	±10,437	(X)	(X)	(X)	(X)

400 percent of poverty level	261,505	±9,356	(X)	(X)	(X)	(X)
500 percent of poverty level	306,216	±7,183	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	66,508	±4,481	16,449	±2,545	24.7%	±3.3
Male	34,123	±3,042	7,713	±1,517	22.6%	±4.0
Female	32,385	±2,636	8,736	±1,872	27.0%	±5.3
15 years	43	±72	43	±72	100.0%	±100.0
16 to 17 years	112	±110	112	±110	100.0%	±69.1
18 to 24 years	4,512	±1,242	1,826	±672	40.5%	±11.8
25 to 34 years	15,136	±1,995	3,104	±788	20.5%	±4.8
35 to 44 years	11,044	±2,062	2,662	±921	24.1%	±6.9
45 to 54 years	6,944	±1,565	1,597	±625	23.0%	±8.5
55 to 64 years	10,474	±1,743	3,324	±1,289	31.7%	±9.8
65 to 74 years	8,991	±1,378	2,324	±833	25.8%	±7.6
75 years and over	9,252	±1,308	1,457	±556	15.7%	±6.0
Mean income deficit for unrelated individuals (dollars)	9,247	±658	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	25,997	±2,739	554	±379	2.1%	±1.5
Worked less than full-time, year-round in the past 12 months	17,832	±2,339	5,406	±1,222	30.3%	±5.8
Did not work	22,679	±2,701	10,489	±2,172	46.2%	±6.0
Population in housing units for whom poverty status is determined	410,094	±995	47,075	±5,859	11.5%	±1.4

SOURCE: data.census.gov | Poverty Status

## **15. Completed Unlawful Discrimination Poster**

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### **Unlawful Discrimination**

It is unlawful for airport operators and their lessees, tenants, concessionaires and contractors to discriminate against any person because of race, color, national origin, sex, creed, or disability in public services and employment opportunities. Allegations of discrimination should be promptly reported to the Monterey Regional Airport Disability/Title VI Liaison 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 Planning and Development Office.

**Coordinator:** Chris Morello/Title VI Liaison/ADA/504 Coordinator  
**Email:** [planning@montereyairport.com](mailto:planning@montereyairport.com)  
**Address:** 200 Fred Kane Drive, Suite 200, Monterey, CA 93940  
**Telephone #:** 831-648-7000 ext 212

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### **Discriminacion Ilegal**

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

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

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

**Coordinator:** Chris Morello/Title VI Liaison/ADA/504 Coordinator  
**Email:** [planning@montereyairport.com](mailto:planning@montereyairport.com)  
**Address:** 200 Fred Kane Drive, Suite 200, Monterey, CA 93940  
**Telephone #:** 831-648-7000 ext 212