Mobile Airport Authority Community Participation Plan (CPP)¹

1. Administration

The purpose of this CPP is to ensure that stakeholders or communities affected² by Mobile Airport Authority projects or operations can be informed and participate and have their input thoughtfully considered in the key stages during airport planning efforts, regardless of their race, color, national origin, sex, sexual orientation, gender identity, creed, age, or disability (hereafter, the "protected bases"). This plan is provided in accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and related authorities.³ This plan and associated reports regarding our CPP efforts will be communicated to the public in formats accessible to persons with disabilities and to limited English proficient (LEP) individuals.

The individuals primarily responsible for implementing the Mobile Airport Authority CPP are:

Responsible Official	Title, Office, and Responsibilities
1. Rita Barren	DBE Liaison / Title VI Coordinator
2. Stephanie Phillips	Property and Concessions Coordinator

Responsible officials' contact information is shared with the public through the following methods:

Website ⁴ , In-person, and Other Communication Methods	Website ⁴ , 1	n-person, and	Other C	Communication	Methods
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1. Website: www.mobileairportauthority.com/mra/disadvantaged-business-enterprises/
2. Direct Phone: (251) 650-2627
3. In-Person: As requested
4. Email: Including email updates/notifications

In addition, Mobile Airport Authority will ensure that members of the public are advised of our nondiscrimination obligations. This includes how to file discrimination complaints with the Mobile Airport Authority and the FAA. We will also conspicuously display the FAA-provided Unlawful Discrimination Posters at airport facilities. See Notice section of Mobile Airport Authority's Title VI Plan.

Mobile Airport Authority also makes this CPP available through the following methods when engaging members of the public concerning planning efforts:

¹ See DOT Order 1000.12C, "The U.S. Department of Transportation (DOT) Title VI Program," Ch. 2, Sec. 4. (Jun. 11, 2021). https://www.transportation.gov/sites/dot.gov/files/2021-08/Final-for-OST-C-210312-002-signed.pdf

² Within this CPP, the term "affected" also means *served*, in addition to *positively or negatively impacted*.

³ Related authorities include the Age Discrimination Act of 1975; Sec. 520 of the Airport and Airway Improvement Act of 1982; and the Civil Rights Restoration Act of 1987.

⁴ [If adding a website, include the relevant webpage location address]

2. Goals and Objectives

This CPP applies to all airport planning and decision-making efforts, whether or not directly supported by Federal assistance. This includes surveys, public meetings (e.g., airport commission meetings), and hearings, not only meetings for a project requiring an environmental impact statement (EIS) or environmental assessment (EA).

Mobile Airport Authority's planning processes that lead to decisions for projects or operations or those of any sub-recipients are:

Planning Processes
1. Mobile Regional Airport Relocation to Mobile International Airport Plan
2.
3.
3.

Mobile Airport Authority seek public input for the above processes through the following methods:

Public Input Methods	Planning Process(es) that use each Method
A. Community Meetings	#1
B. Outreach Forums	#1
C. DBE Outreaches	#1

<u>3. Identification of and Focused Outreach to Affected</u> <u>Communities</u>

See Community Statistics section of Mobile Airport Authority's Title VI Plan, for detailed discussion of Affected Communities.

The specific steps Mobile Airport Authority will take to communicate with, inform, educate, consult or solicit input from, and expand opportunities for engagement with each Affected Community,⁵ are provided below.

⁵ "Affected communities" means any readily identifiable group impacted or potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.

Affected Community	Key Community Reps. (CBOs, unions, leaders, etc.) ⁶	Focused Outreach Steps
i. Baker Community	Neighborhood, business groups and community groups	a. Present info at meetingsb. Advertisements in community- focus media
ii. Westlake Community	Neighborhood, business	c. a. Present info at meetings
n. Westlake Community	groups and community groups	b. Advertisements in community- focus media c.

<u>4. Effective Communication</u>

Mobile Airport Authority will ensure that public engagement is effective, meaningful, and free of linguistic, economic, historical, and cultural barriers to participation. Every effort will be taken to ensure clear, plain, and effective communication with Affected Communities, including ensuring materials are in accessible formats for persons with disabilities and in languages other than English. See Limited English Proficiency (LEP) section of Mobile Airport Authority's Title VI Plan.

5. Communication Platforms

Diverse communication platforms will be utilized to effectively reach the broadest audience. We will use the following platforms to communicate project details, our nondiscrimination obligations, and points of contact for the public to share project or operational feedback with our office and the FAA.

Social Media, Monitors, and Other Communication Platforms

- **1.** Social media platforms, where applicable
- 2. Customer Service, Flyers, Community Meetings
- 3. www.mobileairportauthority.com/mra/disadvantaged-business-enterprises/

⁶ Potential representatives include chamber of commerce, environmental advocacy groups, business leaders, and labor groups. There representatives should have a close association with the community, with particular emphasis on connection to racial and ethnic minority groups within the communities, including limited English proficient populations, as well as other constituencies historically underserved by transportation programs, such as low income populations, and others.

6. Records

This section includes the procedures Mobile Airport Authority will follow to document outreach efforts. Records for steps taken to provide outreach to Affected Communities will be maintained in the following locations:

Website⁷, In-person, and Other Storage Methods

1. Designated office(s) of Procurement, Grant Administration, and DBE Liaison

2. www.mobileairportauthority.com/mra/disadvantaged-business-enterprises/

Records will be kept for community input. The records will document how Mobile Airport Authority considered, weighed, and incorporated input received. The records will include justifications for any decisions contrary to community feedback. The records will be stored in the following locations:

Website⁸, In-person, and Other Storage Methods

1. Designated office(s) of Procurement, Grant Administration, and DBE Liaison **2.** www.mchilesirporteuthority.com/mrg/diseducateged_business_enterprises/

2. www.mobileairportauthority.com/mra/disadvantaged-business-enterprises/

Records for demographics of participants will also be kept. Requested demographic information will include race, national origin, sexual orientation, gender identity, creed, age, disability, languages spoken, and community membership.⁹ Demographic information will be requested by the following methods:

Demographic Information Collection Methods

1. Voluntary disclosure by attendees on sign-in sheets during public meetings

2. Event registration process, whenever applicable

CPP records will be made available to the public using the same methods for other information outlined within this plan.

⁷ [If adding a website, include the relevant webpage location address]

⁸ [If adding a website, include the relevant webpage location address]

⁹ This information is solicited to demonstrate compliance with Title VI and related requirements. See 49 CFR § 21.9(b); 49 U.S.C. § 47123; 28 CFR § 42.406; and FAA Order 1400.11.

7. Reporting Outcomes

Within 30 days of the end of each fiscal year (FY),¹⁰ Mobile Airport Authority will create a CPP Report for that current FY. The report will summarize efforts taken under this CPP in a narrative statement describing:

- 1. The specific steps taken to produce meaningful engagement with Affected Communities that FY,
- 2. The documented results of those efforts for that FY, and
- 3. A summary of how the Affected Communities' comments and views will be incorporated into the decision-making process.

The CPP Reports will be included with Mobile Airport Authority's Title VI Plan as it is updated.

¹⁰ The first report is required after the first complete fiscal year, after this plan is adopted. Information for activities during a partial year immediately following adoption of the plan will be included with the first full year's report.

Appendix 1

Complete only if required by Section 3¹¹

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

Mobile Regional Airport (MOB) (FAA identifier KMOB), which is approximately 11 miles due west of the City's downtown area. The airport elevation is 218.7 feet MSL. MOB is a publicowned facility and quasi-governmental entity, and it is presently the City's primary commercial service airport encompassing 3,073 acres. Development adjacent to the Airport is aeronautical and non-aeronautical industrial and commercial uses. In addition, the flight path including an aircraft's trajectory and the path in the air following that exposes the underlying property to a sound level over DNL 65, does not include any residential communities. However, the Airport has identified two communities as potentially affected communities. The Baker Neighborhood and Westlake Neighborhood.

Affected Communities ¹²	Population
Cite of Mobile - Baker Neighborhood (36608)	35,714
City of Mobile - Westlake Neighborhood (36695)	53,352

(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 Communities¹³.

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," Mobile Airport Authority is collecting information about affected and potentially affected low-income communities.

According to *U.S. Census Report, such as* <u>S1701: Poverty Status in the Past 12 Months</u>, the overall poverty level for the Baker and Westlake communities, which is located over two zip codes (36608 and 36695) is an average of approximately 14.4%, which is similar to the rest of Mobile County at 17.6% The poverty rates for the Affected Communities by zip code are as follows:

¹¹ [In general, this appendix should only be completed if the airport does not have a current Title VI Plan that has been accepted by the FAA. Information does not need to be copied and pasted from the Title VI Plan]. ¹² "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.

¹³ 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.

Affected Communities	Poverty Rate
Baker Community	18.6%
Westlake Community	10.0%

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 for the specific Affected Communities are as follows¹⁴:

Affected Community: <u>Baker Community (36608)</u> Total Affected Community Population: <u>34,691</u>					
Demographic Group within Affected Number of People in Percent of Total Affected					
Community	Minority Group	Community Population			
White	21,211	14.0%			
Black or African American	11,336	25.4%			
Asian	864	36.3%			
Hispanic or Latino	1,385	29.%			
More than one	918	23.0%			

Potentially Affected Community: Westlake Community (36695)

Total Affected Community Population: <u>52,396</u>				
Demographic Group within Affected	Number of People in	Percent of Total Affected		
Community	Minority Group	Community Population		
White	39,276	7.4%		
Black or African American	10,846	18.4%		
Asian	1,147	10.6%		
Hispanic or Latino	1,352	20.9%		

Limited English Proficiency (LEP).

More than one

The goal of all language access planning and implementation is to ensure that Mobile Airport Authority communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages¹⁵ that are spoken in LEP households in the Affected Communities. The data source is American Community Survey, 5-year Estimates, the Airport utilized B16001 Table; Language Spoken At Home by Ability to Speak English, 2015.

731

17.6%

¹⁴ Recommend using demographic groups from the U.S. Census.

¹⁵ 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.

The threshold we have used for identifying the languages with significant LEP populations is the DOT safe harbor threshold, which is 5% or 1,000, whichever is less.¹⁶ The safe harbor for our community is 47.55. [Calculate the safe harbor. If the total population in your area is 20,000 or greater, then the safe harbor is 1,000. If the total population in your area is less than 20,000, then the safe harbor will be 5% of the total population. For example, if your total population is 15,000, the safe harbor should be 750]. Please refer to the end of this document to find data for all languages in our community.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold (36608)	Number	Margin of Error
Spanish	449	+/-222
Languages Spoken by LEP Population that Meet the Safe	Number	Margin of Error
Harbor Threshold (36695)		8
Spanish	502	+/-260
See Table B16001: Language Spoken at Home by Ability		

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

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				
French				
Portuguese				
German				
Greek				
Persian				
Vietnamese				
Arabic				
African Languages				

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

Additional Languages Spoken

None

¹⁶ See the DOT LEP Policy Guidance at <u>https://www.federalregister.gov/d/05-23972/p-133</u>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

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=A CSDT1Y2019.B16001
State of Alabama Demographic Data	https://data.census.gov/profile/Alabama?g=040XX00 US01
Mobile County School District Data	https://censusreporter.org/profiles/97000US0102370- mobile-county-school-district-al/

This information is updated annually¹⁷ through checking the following resources:

Beneficiary Diversity.

Demographic information will be 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

- Mobile Airport Authority Customer Service Office conducts biannual surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey includes a voluntary request for demographic information.
- Participants at DBE/small business workshops, pre-bid meetings, and other public meetings are asked to complete an anonymous survey that includes demographic information.
- 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 will be 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

- Mobile Airport Authority will ask employees 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 will ask board members by email asking them to enter demographic information voluntarily and anonymously through an online survey. The Airport will begin this practice on October 1, 2024, and each year moving forward.

¹⁷ 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.

Appendix 2

Complete only if required by Section 4¹⁸

In creating a Language Assistance Plan, the **Mobile Airport Authority** 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:

Safe Harbor Threshold	
African	
Arabic	
Chinese	
French	
German	
Greek	
Hindi	
Japanese	
Persian	
Portuguese	
Spanish	
Tagalog	
Urdu	
Vietnamese	
Spanish	

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold

Mobile Airport Authority will also collect data for languages spoken by airport guests.¹⁹ Data sources include:

Data Sources for Languages Spoken by	Website link to Data
Airport Guests	Source
Airport language line usage data	www.languageline.com
Airline-provided data	N/A
Assumption from flight origin / destination	N/A
Assistance requests to airport information desks	N/A

¹⁸ [In general, this appendix should only be completed if the airport does not have a current Title VI Plan that has been accepted by the FAA. Information does not need to be copied and pasted from the Title VI Plan].
¹⁹ 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.

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 **Mobile Airport Authority** 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
https://translate.google.com/	All above languages

• Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport website request form	All above languages
Airport website translate view	Spanish
Volunteer multi-lingual staff pool	Spanish, Portuguese

Interpretation Services:

• The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Language Line, Inc.	All above languages

• Information regarding interpretation services can be obtained at:

Location for Interpretation	Languages
Assistance	
Airport Information desks	All above languages, using Language Line, Inc.
	and Google Translate.
Airport Information desks	Spanish

Description of Interpretation Assistance Processes

- Mobile Airport Authority Customer Service Office will maintain a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient in providing interpretation and/or translation services. The list will be updated annually in the Public Information Handbook and provided to all airport employees.
- The airport will seek to contract with Language Line, Inc. to provide on-demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process will be used: Airport information desk staff use I-Speak cards to identify the language spoken by the airport guest. Staff contact 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 completed call is then logged in the Language Line Service binder. This log is kept for one year.