

Santa Barbara Airport Title VI Plan

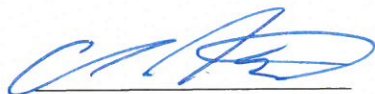
1. Title VI Policy Statement¹

The City of Santa Barbara 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 City of Santa Barbara 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 City of Santa Barbara will take action to involve them and the general public in the decision making process.

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

Andrew Bermond, available at (805) 693-6057 and ABermond@SantaBarbaraCA.gov, 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
Chris Hastert
Airport Director

February 21, 2024

Effective Date

February 21, 2027

3-Year Expiration Date

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

2. Administration

The Council of the City of Santa Barbara has reviewed and adopted this Title VI Plan for the City of Santa Barbara. 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 name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the City Council 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
John Feldhans	DBE/ACDBE Program
Sara Iza	Community Participation Plan
Angi Daus	Community Relations

As of the date of this plan, the City of Santa Barbara only has applications for Federal funding assistance for the Santa Barbara Airport from the Federal Aviation Administration (FAA). The current applications are:

Federal Source	Grant Number	Amount (Requested Federal Share)	SBA Project
Federal Aviation Administration	20.106	\$250,000	Terminal Improvement Project Environmental Review
Federal Aviation Administration	20.106	\$1,750,000	Taxiway B, F, P Rehabilitation
Federal Aviation Administration	20.106	\$500,000	Vehicle Service Road Rehabilitation
Federal Aviation Administration	20.106	\$4,114,000	Taxiway H Extension Design
Federal Aviation Administration	20.106	\$3,420,000	South Terminal Apron Rehabilitation
Federal Aviation Administration	20.106	\$2,000,000	Taxiway C, H Rehabilitation
Federal Aviation Administration	20.106	\$2,800,000	Taxiway A, E, K, L Rehabilitation
Federal Aviation Administration	20.106	\$12,936,000	Taxiway H Extension Construction`
Federal Aviation Administration	20.106	\$40,000,000	Terminal Improvement Project
Federal Aviation Administration	20.106	\$2,232,000	Runway 15R-33L Rehabilitation

In addition, **City of Santa Barbara** 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
<i>None</i>	<i>None</i>	<i>\$0</i>

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

Federal Source	Grant Award Information Available at:
DHS	www.DHSgrantinfo.gov
DOJ	www.USgrantsinfo.net
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 City of Santa Barbara will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See https://www.faa.gov/airports/aip/grant_assurances/#current-assurances.

Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See 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 City of Santa Barbara requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. All solicitations for bidding include a Fair Employment Practice Act disclosure compliant with Sections 1735 and 1777.6 of the California Labor Code and the City of Santa Barbara’s Nondiscrimination Policy.

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 Division to verify they include the template language, for not less than 10 percent of 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 the City of Santa Barbara 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 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 City of Santa Barbara 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,² and maintained. The

² For more information about website accessibility, please visit ADA.gov.

poster template is available at https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/ and a completed copy is attached. See Section 15 Appendix.

The City of Santa Barbara has posted the above Title VI policy statement at its staff offices.

The City of Santa Barbara has distributed this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan was distributed on February 21, 2024 by email.

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
Terminal	1	2	0
Historic Terminal	1	0	0
Airport Administration Building	1	0	0
Airport Maintenance Building	1	0	0
Atlantic Aviation	1	0	0
Big Brand Tires	1	0	0
Signature Flight Support	1	0	0
Surf Air	1	0	0
Twin Lakes Golf Course	1	0	0

Outreach to Affected Communities

The Airport Marketing 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 in social media, general circulation newspapers, community newspapers, email broadcast, and at www.flysba.com. The Airport Capital Support Division contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities³ 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 City of Santa Barbara will create a detailed CPP by April 30, 2024. A copy of the plan will be available at www.flysba.com/civilrights.

³ 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.

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

6. Community Statistics

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

Affected Communities ⁴	Population
City of Santa Barbara	86,572
City of Goleta	32,455
Eastern Goleta Valley Census Designated Place	28,897
Isla Vista Census Designated Place	14,234
University of California, Santa Barbara Census Designated Place	1,673

(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 Communities⁵

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,” City of Santa Barbara is collecting information about affected and potentially affected low-income communities. According to the 2021 American Community Survey, the overall poverty level for the South Coast of Santa Barbara County (i.e. Santa Barbara Census County Division) is approximately 15.5 %. The poverty rate is similar to that of Santa Barbara County (14.4%). The poverty rates for the specific Affected Communities are as follows:

⁴ “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.

⁵ 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
City of Santa Barbara	14.5%
City of Goleta	10.2%
Eastern Goleta Valley Census Designated Place	5.9%
Isla Vista Census Designated Place	71.5%
University of California, Santa Barbara Census Designated Place	16.3%

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 follows⁶:

Affected Community: City of Santa Barbara
Total Affected Community Population: 86,572

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	62,291	71%
Black or African American	1,472	2%
American Indian or Alaska Native	641	1%
Asian	3,269	4%
Native Hawaiian or Other Pacific Islander	93	<1%
Hispanic or Latino	31,756	36%
More than one	9,111	10%
No response / would not say	11,297	13%

Affected Community: City of Goleta
Total Affected Community Population: 32,455

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	<i>19,769</i>	<i>61%</i>
<i>Black or African American</i>	<i>824</i>	<i>3%</i>
<i>American Indian or Alaska Native</i>	<i>176</i>	<i>1%</i>
<i>Asian</i>	<i>3,120</i>	<i>10%</i>
<i>Native Hawaiian or Other Pacific Islander</i>	<i>0</i>	<i>0%</i>
<i>Hispanic or Latino</i>	<i>11,971</i>	<i>37%</i>
<i>More than one</i>	<i>3754</i>	<i>12%</i>
<i>No response / would not say</i>	<i>4,812</i>	<i>15%</i>

Affected Community: Eastern Goleta Valley

⁶ Recommend using demographic groups from the U.S. Census.

Total Affected Community Population: 28,897

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	21,981	76%
Black or African American	173	1%
American Indian or Alaska Native	340	1%
Asian	1,453	5%
Native Hawaiian or Other Pacific Islander	83	<1%
Hispanic or Latino	6,981	24%
More than one	2,453	8%
No response / would not say	2,414	8%

Affected Community: Isla Vista
Total Affected Community Population: 14,234

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	8,973	63%
Black or African American	782	5%
American Indian or Alaska Native	178	1%
Asian	2,156	15%
Native Hawaiian or Other Pacific Islander	6	<1%
Hispanic or Latino	3,401	24%
More than one	784	6%
No response / would not say	1,355	10%

Affected Community: University of California, Santa Barbara
Total Affected Community Population: 1,673

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	1,125	67%
Black or African American	37	2%
American Indian or Alaska Native	0	0%
Asian	242	14%
Native Hawaiian or Other Pacific Islander	0	0%
Hispanic or Latino	284	17%
More than one	121	7%
No response / would not say	1,355	9%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that City of Santa Barbara communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁷ that are spoken in LEP households in the Affected Communities. The data source is the American Community Survey.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.⁸ The safe harbor for our community is 1,000. 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	Number	Margin of Error
Spanish	19,055	+/-1,281
Chinese (incl. Mandarin, Cantonese)	1,699	+/-366

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				X
Chinese (incl. Mandarin, Cantonese)	X			

No additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, or others were identified.

This information is updated annually⁹ 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
Santa Barbara County Public Health Department	www.countyofsb.org/410/Public-Health

⁷ 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.

⁸ 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.

⁹ 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.

Santa Barbara Unified School District	www.sbunified.org
Goleta Union School District	www.gusd.us

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

Description of Employee and Advisory Board Demographic Information Collection Methods

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

7. Potential or Known Community Impacts

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. Thus, in general, no City of Santa Barbara 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.¹⁰

The following airport facilities are already in use or under construction and expected to be in use

¹⁰ 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.

within the next 3 years:

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
Runway 7-25	City of Goleta, Eastern Goleta Valley
Runway 15L-33R	None
Runway 15R-33L	None
Airline Terminal	None
Southfield Redevelopment Project	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
Southfield Redevelopment Project	None
Airline Terminal Improvement Project	None
Taxiway H Extension Project	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. None of them have disparate impacts.

8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the City of Santa Barbara 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
Chinese (incl. Mandarin, Cantonese)

The City of Santa Barbara also collects data for languages spoken by airport guests.¹¹ Data sources include:

¹¹ 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.

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
Airport DeepL usage data	www.deepl.com
Airport Language Line usage data	www.language-line.com
Airline-provided data	N/A
Assumption from flight origin / destination	N/A
Assistance requests to Security Operations Center	None

Based on the above data, no additional languages have been identified as likely to be spoken by LEP airport guests.

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 City of Santa Barbara 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
DeepL	All above languages
Language Line	All above languages

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
City website translate view	Spanish
Volunteer multi-lingual staff pool	Spanish
Airport Patrol and Custodians	Spanish

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Listen Everywhere Cellular Telephone Application	Spanish
Language Line	All above languages

Information regarding interpretation services can be obtained at:

<https://santabarbaraca.gov/news/real-time-translation-and-audio-assistance-city-council-meetings>

Description of Interpretation Assistance Processes

- The City of Santa Barbar Human Resources Department maintains 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 is updated annually in the Public Information Handbook and provided to all airport employees. 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 Language Line 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 and “parks” the request in the queue for the appropriate language. Language Line 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 binder. This log is kept for one year.
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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 Santa Barbara County Association of Governments and the Santa Barbara County Metropolitan Transit District 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
All Five Communities	MTD Line 11	Existing
All Five Communities	EasyLift Paratransit Service	Existing
City of Goleta/UC Santa Barbara	Electric Shuttle Service	Planned

10. Minority Businesses
49 CFR 21 Appendix C (a)(1)(x)

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

Airport Business Opportunity	Minority Business Outreach Methods
Concessions Opportunities	<p>Advertised through PlanetBids.com, an online portal for all City of Santa Barbara procurement opportunities and send notices via current outreach email lists.</p> <p>As part of the advertising for procurement opportunities the City of Santa Barbara identifies opportunities available for minority and women-owned businesses, although it is legally prohibited from giving preference to such businesses per California Proposition 209 (1996).</p>
Parking Lot Operations Contract	Advertised through PlanetBids.com, an online portal for all City of Santa Barbara procurement opportunities and send notices via current outreach email lists.
Other Contracting Opportunities	Advertised through PlanetBids.com, an online portal for all City of Santa Barbara as well as regional public and private sector procurement opportunities; send notices via current outreach email lists; and host periodic outreach events including specific outreach targeted toward both construction and professional services.

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 City General Services Division.

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 requirements¹²
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹³

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 City of Santa Barbara 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 matters¹⁴
3. Allege misconduct by the City of Santa Barbara, including airport employees, contractors, concessionaires, lessees, or tenants.

¹² 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.

¹³ 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.

¹⁴ 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.

4. Concern an airport facility or actions by the City of Santa Barbara including airport employees, contractors, concessionaires, lessees, or tenants.

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 City of Santa Barbara.¹⁵ 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 in the complaint and promptly send copies of the complaint to the Human Resources Department, the Airport Director, and the office named in the complaint.

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

Andrew Bermond, Facilities Manager
1699 Norman Firestone Road
Santa Barbara, CA 93117
(805) 692-6057
ABermond@SantaBarbaraCA.gov

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

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 24 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

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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. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

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

Cooperation with FAA. The Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against the Santa Barbara Airport or the City of Santa Barbara, 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. The City Attorney's Office 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 the Human Resources Department mediation process.

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 Santa Barbara 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 Director.
- The written appeal must be received within 20 business days after receipt of the written decision.
- The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal.
- The Airport Director will issue a final written decision in response to the appeal.

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

Intimidation and Retaliation Prohibited. Santa Barbara 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 Andrew Bermond.

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

Website, In-person, and Other Distribution Methods

1 Santa Barbara Airport's Title VI page at www.flysba.com/civilrights

2 Recorded presentation to the Santa Barbara City Council on December 5, 2023

3 In person at annual Airport Stakeholder meetings

14. Population / Language Data

Source: American Community Survey, 2021: Poverty Status in the Past 12 Months		Santa Barbara CCD, Santa Barbara 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	177,671	±1,855	27,580	±1,935	15.5%	±1.1
AGE						
Under 18 years	29,995	±1,167	2,940	±699	9.8%	±2.2
Under 5 years	7,971	±642	661	±282	8.3%	±3.3
5 to 17 years	22,024	±1,053	2,279	±622	10.3%	±2.7
Related children of householder under 18 years	29,723	±1,172	2,681	±676	9.0%	±2.2
18 to 64 years	115,696	±1,648	22,228	±1,559	19.2%	±1.3
18 to 34 years	55,785	±1,682	17,415	±1,338	31.2%	±1.9
35 to 64 years	59,911	±1,259	4,813	±744	8.0%	±1.2
60 years and over	43,053	±1,144	3,220	±523	7.5%	±1.2
65 years and over	31,980	±862	2,412	±445	7.5%	±1.4
SEX						
Male	87,993	±1,370	12,217	±1,172	13.9%	±1.3
Female	89,678	±1,463	15,363	±1,265	17.1%	±1.4
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	124,716	±2,466	16,604	±1,206	13.3%	±1.0
Black or African American alone	3,361	±609	1,013	±275	30.1%	±7.3
American Indian and Alaska Native alone	1,338	±432	127	±102	9.5%	±7.3
Asian alone	10,553	±893	2,897	±406	27.5%	±3.2
Native Hawaiian and Other Pacific Islander alone	182	±171	75	±58	41.2%	±38.8
Some other race alone	20,512	±2,141	4,203	±947	20.5%	±4.0
Two or more races	17,009	±1,798	2,661	±955	15.6%	±5.1
Hispanic or Latino origin (of any race)	55,808	±2,012	9,802	±1,492	17.6%	±2.5
White alone, not Hispanic or Latino	102,132	±2,102	13,068	±947	12.8%	±0.9
EDUCATIONAL ATTAINMENT						
Population 25 years and over	117,506	±1,394	9,898	±954	8.4%	±0.8

Less than high school graduate	12,051	±1,006	2,373	±633	19.7%	±4.5
High school graduate (includes equivalency)	13,807	±888	1,728	±363	12.5%	±2.3
Some college, associate's degree	29,983	±1,314	3,142	±536	10.5%	±1.6
Bachelor's degree or higher	61,665	±1,690	2,655	±387	4.3%	±0.6
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	98,355	±1,798	12,325	±1,189	12.5%	±1.2
Employed	93,313	±1,755	10,230	±1,017	11.0%	±1.1
Male	49,375	±1,388	4,301	±615	8.7%	±1.2
Female	43,938	±1,238	5,929	±850	13.5%	±1.9
Unemployed	5,042	±690	2,095	±463	41.6%	±6.2
Male	2,499	±438	871	±261	34.9%	±7.8
Female	2,543	±576	1,224	±395	48.1%	±8.3
WORK EXPERIENCE						
Population 16 years and over	151,275	±1,808	25,111	±1,657	16.6%	±1.1
Worked full-time, year-round in the past 12 months	57,106	±1,587	1,557	±355	2.7%	±0.6
Worked part-time or part-year in the past 12 months	47,885	±1,710	13,037	±1,091	27.2%	±1.9
Did not work	46,284	±1,243	10,517	±835	22.7%	±1.7
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	17,261	±1,595	(X)	(X)	(X)	(X)
125 percent of poverty level	33,248	±1,974	(X)	(X)	(X)	(X)
150 percent of poverty level	39,223	±2,400	(X)	(X)	(X)	(X)
185 percent of poverty level	46,770	±2,530	(X)	(X)	(X)	(X)
200 percent of poverty level	50,506	±2,468	(X)	(X)	(X)	(X)
300 percent of poverty level	68,673	±2,558	(X)	(X)	(X)	(X)
400 percent of poverty level	87,095	±2,464	(X)	(X)	(X)	(X)
500 percent of poverty level	102,194	±2,403	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED						
Male	59,709	±2,228	20,560	±1,326	34.4%	±1.7
Female	28,623	±1,394	9,007	±875	31.5%	±2.3
15 years	31,086	±1,604	11,553	±1,044	37.2%	±2.5
16 to 17 years	0	±31	0	±31	-	**
18 to 24 years	255	±134	251	±134	98.4%	±3.1
25 to 34 years	19,847	±1,326	13,912	±1,180	70.1%	±3.1
35 to 44 years	12,545	±1,013	1,612	±309	12.8%	±2.2
35 to 44 years	4,520	±547	752	±210	16.6%	±4.1

45 to 54 years	4,122	±521	880	±233	21.3%	±4.5
55 to 64 years	6,258	±614	1,371	±292	21.9%	±4.2
65 to 74 years	6,225	±652	798	±198	12.8%	±3.0
75 years and over	5,937	±691	984	±278	16.6%	±3.7
Mean income deficit for unrelated individuals (dollars)	8,888	±320	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	20,282	±1,234	930	±308	4.6%	±1.5
Worked less than full-time, year-round in the past 12 months	21,942	±1,326	11,197	±946	51.0%	±2.6
Did not work	17,485	±941	8,433	±660	48.2%	±2.9
Population in housing units for whom poverty status is determined	176,479	±1,847	26,886	±1,910	15.2%	±1.1

Source: American Community Survey, 2015: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Older

Santa Barbara CCD, Santa Barbara County, California

Language & Ability Level	Estimate	Margin of Error
Total:	182,584	±1,185
Speak only English	121,613	±1,686
Spanish or Spanish Creole:	43,971	±1,453
Speak English "very well"	24,916	±1,309
Speak English less than "very well"	19,055	±1,281
French (incl. Patois, Cajun):	1,195	±258
Speak English "very well"	1,072	±246
Speak English less than "very well"	123	±70
French Creole:	49	±70
Speak English "very well"	8	±14
Speak English less than "very well"	41	±67
Italian:	764	±241
Speak English "very well"	615	±226
Speak English less than "very well"	149	±81
Portuguese or Portuguese Creole:	389	±141
Speak English "very well"	349	±133
Speak English less than "very well"	40	±37
German:	1,852	±442
Speak English "very well"	1,464	±374
Speak English less than "very well"	388	±223
Yiddish:	69	±68
Speak English "very well"	63	±69
Speak English less than "very well"	6	±10
Other West Germanic languages:	212	±81
Speak English "very well"	207	±80
Speak English less than "very well"	5	±8
Scandinavian languages:	647	±277
Speak English "very well"	511	±206
Speak English less than "very well"	136	±106
Greek:	196	±125
Speak English "very well"	164	±103
Speak English less than "very well"	32	±40
Russian:	402	±146
Speak English "very well"	309	±124
Speak English less than "very well"	93	±71
Polish:	157	±90
Speak English "very well"	130	±85
Speak English less than "very well"	27	±24

Serbo-Croatian:	51	±51
Speak English "very well"	42	±43
Speak English less than "very well"	9	±15
Other Slavic languages:	176	±155
Speak English "very well"	124	±122
Speak English less than "very well"	52	±44
Armenian:	164	±93
Speak English "very well"	139	±79
Speak English less than "very well"	25	±39
Persian:	539	±190
Speak English "very well"	415	±167
Speak English less than "very well"	124	±105
Gujarati:	150	±95
Speak English "very well"	90	±79
Speak English less than "very well"	60	±67
Hindi:	557	±214
Speak English "very well"	517	±211
Speak English less than "very well"	40	±41
Urdu:	67	±55
Speak English "very well"	48	±36
Speak English less than "very well"	19	±24
Other Indic languages:	337	±138
Speak English "very well"	325	±130
Speak English less than "very well"	12	±37
Other Indo-European languages:	317	±186
Speak English "very well"	294	±162
Speak English less than "very well"	23	±32
Chinese:	3,938	±486
Speak English "very well"	2,239	±304
Speak English less than "very well"	1,699	±366
Japanese:	655	±221
Speak English "very well"	298	±115
Speak English less than "very well"	357	±181
Korean:	762	±198
Speak English "very well"	461	±145
Speak English less than "very well"	301	±149
Mon-Khmer, Cambodian:	81	±77
Speak English "very well"	37	±37
Speak English less than "very well"	44	±68
Hmong:	7	±11
Speak English "very well"	0	±28
Speak English less than "very well"	7	±11
Thai:	122	±95

Speak English "very well"	18	±27
Speak English less than "very well"	104	±90
Laotian:	9	±14
Speak English "very well"	9	±14
Speak English less than "very well"	0	±28
Vietnamese:	913	±216
Speak English "very well"	584	±161
Speak English less than "very well"	329	±154
Other Asian languages:	228	±105
Speak English "very well"	190	±97
Speak English less than "very well"	38	±34
Tagalog:	608	±192
Speak English "very well"	357	±121
Speak English less than "very well"	251	±121
Other Pacific Island languages:	250	±107
Speak English "very well"	132	±83
Speak English less than "very well"	118	±67
Navajo:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Native North American languages:	4	±8
Speak English "very well"	4	±8
Speak English less than "very well"	0	±28
Hungarian:	69	±68
Speak English "very well"	46	±49
Speak English less than "very well"	23	±35
Arabic:	495	±147
Speak English "very well"	273	±97
Speak English less than "very well"	222	±107
Hebrew:	223	±108
Speak English "very well"	215	±108
Speak English less than "very well"	8	±12
African languages:	187	±122
Speak English "very well"	187	±122
Speak English less than "very well"	0	±28
Other and unspecified languages:	159	±116
Speak English "very well"	142	±106
Speak English less than "very well"	17	±20

15. Completed Unlawful Discrimination Poster

Unlawful Discrimination

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

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

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

Coordinator: Andrew Bermond
Phone: 805-692-6057
Email: ABermond@SantaBarbaraCA.gov
Address: 601 Norman Firestone Road
Santa Barbara, CA 93117

Discriminacion Ilegal

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

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

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

Coordinador: Andrew Bermond
Teléfono: 805-692-6057
Email: ABermond@SantaBarbaraCA.gov
Dirección: 601 Norman Firestone Road
Santa Barbara, CA 93117



U.S. Department of Transportation
Federal Aviation Administration

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