Pease Development Authority
Portsmouth International Airport Title VI Plan

1. Title VI Policy Statement[1]

The Pease Development Authority, Owner and Operator of the Portsmouth International Airport at Pease (PSM) 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 Pease Development Authority 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 Portsmouth International Airport at Pease (PSM). Anytime Affected Communities may be impacted by programs or activities the Pease Development Authority will take action to involve them and the general public in the decision-making process.

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

Andrew B. Pomeroy, C.M. Director, Aviation Planning and Regulatory Compliance, available at 603-766-9231 and a.pomeroy@peasedev.org, is responsible for overseeing PSM'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.

Paul G. Brean

Signature
Paul E. Brean, C.M.
Executive Director

9/1/2024
Effective Date

8/31/2027
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 Executive Director has reviewed and adopted this Title VI Plan for PSM. 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 Executive Director's or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Executive Director 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
Michael R. Mates, PE	*Director of Engineering*
Michael C. Rogerson, PE, LEED AP	*Engineer*
Toni-Marie Vaughn	*Contract & Purchasing Administrator*

The Portsmouth International Airport has the following airport program sub-recipients: None.

Sub-Recipients
None

As of the date of this plan, The Portsmouth International Airport (PSM) has the following pending applications for federal financial assistance:

Federal Source	Grant Number	Amount
FAA AIP- Snow Removal Equipment 2 Pieces	*Grant number not assigned*	*$1,474,445.70*
FAA AIP and BIL Taxiway A North Construction	*Grant number(s) not assigned*	*$5,967,535.00*
FAA AIP Taxiway A South Design	*Grant number not assigned*	*$362,800.00*

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/*

BIL ATP	**https://www.faa.gov/newsroom/bipartisan-infrastructure-law-airport-terminal-program-grants-file**
BIL AIG	**https://www.faa.gov/general/bipartisan-infrastructure-law-airport-infrastructure-grant-funding-amounts**

3. Grant and Procurement Assurances

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

The Pease Development Authority 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 Pease Development Authority requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. The following clause is required to be included:

- *PSM, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 USC §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders or offerors that it will affirmatively ensure that for any contract entered into pursuant to this advertisement, [select businesses, or disadvantaged business enterprises or airport concession disadvantaged business enterprises] will be afforded full and fair opportunity to submit bids in response to this invitation and no businesses will be discriminated against on the grounds of race, color, national origin (including limited English proficiency), creed, sex (including sexual orientation and gender identity),or age in consideration for an award*

Description of Oversight Methods for Subcontracts
Required provisions are inserted into base template used in all subcontracts related to the airport program. Subcontracts are audited by the PDA Engineering and the office of the Contract & Purchasing Administrator 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 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 the Training Section for more information on 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 Pease Development Authority 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 Section 12 regarding compliance reviews, audits, lawsuits, and other investigations, and complaints.

The Coordinator has requested and received access to the Title VI portion of the FAA Civil Rights Connect System (https://faa.civilrightsconnect.com/).

5. Notice

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

The Pease Development Authority 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 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 as **Appendix B**.

Unlawful Discrimination Posters are conspicuously displayed in the airline terminal and other areas on airport property, including the following public locations: Rental Car Counters, Airline Ticket Counters, Airport Information Booth, and Baggage Claim.

Terminal/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area
Airline Terminal Building	*2*	*2*
Rental Car Facilities	*1*	

The Pease Development Authority will make this Title VI Plan available to its employees and airport contractors, concessionaires, lessees, and tenants upon approval by the FAA. This plan will be referenced in upcoming contract documents and all future AIP project contracts. The plan will be made available to all airport employees, concessionaires, lessees, and tenants via Portsmouth International Airport's Website at: https://flypsmairport.com/community/nondiscrimination-titlevi/

Outreach to Affected Communities

The Pease Development Authority Administrative Office ensures that notices for public meetings reach all segments of the impacted community. When applicable the Public Relations and Media Consultant may assist the Title VI coordinator in identifying the effective media platforms to share announcements and notices. Announcements may be made in social media,

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

general circulation newspapers, community newspapers, email broadcast, company webpage and by direct mail as appropriate. The Public Relations and Media Consultant may assist the PDA Administrative offices in contacting leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities[3] and provide important feedback on translated materials where applicable. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

Detailed information on our public notice and outreach procedures is available in the Pease Development Authority Portsmouth International Airport's Community Participation Plan (CPP), upon approval by the FAA. At that time a copy of the CPP is available via https://flypsmairport.com/community/nondiscrimination-titlevi/ or Title VI Coordinator, and a copy of the approved CPP will be attached to this Title VI Plan.

To ensure that the community is effectively informed of and able to participate in public hearings, the Pease Development Authority includes public notices translated into appropriate languages when needed, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such social media postings and notices will include directions for obtaining an interpreter, free of charge, for public hearings. 28 CFR § 42.405(d). See Section 8 (Limited English Proficiency).

6. Community Statistics

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). The Pease Development Authority seeks to understand communities that are eligible to be served, potentially or actually affected, and/or benefited or burdened by the airport's activities, programs and services. By understanding community demographic information, the Pease Development Authority can identify, understand, and appropriately engage with the communities surrounding the Portsmouth International Airport. The data contained herein can be used to evaluate and assess whether identified low-income, minority, LEP, or ethnically diverse populations could potentially bear disproportionately high and adverse impacts from a future proposed airport project(s)

The FAA defines "Affected Communities" as any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or community in the flight path. The Pease Development Authority has identified these Affected Communities as the U.S. Census Tract populations that intersect with the airport's 2019 Five Year Forecast Conditions Noise Exposure Map, Day-Night Average Sound Level (DNL) 65 decibels (dBA) noise exposure contour. These populations are determined to experience potential direct effects (areas that would be physically disturbed) and indirect effects (areas that could experience air quality, noise, traffic, or visual effects) of a proposed Airport project.

[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.

In an effort to ensure that our greater airport community is represented, the Pease Development Authority has further extended the scope of these Affected Communities to include any Census Tract Block Group (BG) area that comes in contact with the airport's 60 DNL noise exposure contour, (See Appendix D). As such these communities will be referred to collectively in this Title VI Plan as the" Affected Communities."

Affected Communities[4]	Population
Census BG1, Tract 1074	*642*
Census BG2, Tract 1074	*579*
Census BG2. Tract 1072	*1,218*
Census BG1, Tract 1075	*964*

Within Portsmouth International Airport's Affected Communities, Environmental Justice Communities of Concern are found to exist if:

1. The minority population exceeds 50 precent, or
2. The minority population percentage is meaningfully greater (at least 10 percentage points greater) than adjacent geographical units (PSM's Surrounding Communities), or
3. There is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds.

Through these metrics, PSM has been found to have no Environmental Justice Communities of Concern.

Low Income Communities[5].

A low-income community is an identifiable group of people 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 Pease Development Authority is collecting information about affected and potentially affected low-income communities. According to *U.S. Census Report, S1701: Poverty Status in the Past 12 Months*, the overall poverty level for the for New Hampshire's Rockingham County in which the Portsmouth International Airport resides is approximately 5.2%. The poverty rate remains similar compared with the rest of the airport's primary service area (Merrimack, and Strafford Counties in New Hampshire and York and Cumberland Counties in Maine).

Note: the Census Demographic Data Tables do not scale down to the individual Census Tract BG level, therefore the numbers in the tables below use the entire US Census Tract which may

[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.

consist of as many as five (5) BGs and includes populations outside of the designated Affected Communities.

The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
Census Tract 1074	*3.3%*
Census Tract 1075	*2.5%*
Census Tract 1072	*4.0%*

Racial and Ethnic Communities.

U.S. Census Bureau demographic data were 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[6]:

Affected Community: ***Census Tract 1074*** *(BG1 and BG2)*
Total Affected Community Population: *1,256*

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	*1,096*	*87.3%*
Black or African American	*18*	*1.4%*
American Indian or Alaska Native	*7*	*0.6%*
Asian	*58*	*4.6%*
Native Hawaiian or Other Pacific Islander	*0*	*0%*
Hispanic or Latino	*37*	*2.9%*
More than one	*58*	*4.6%*
Other	*19*	*1.5%*

Affected Community: ***Census Tract 1072*** *(BG1, BG2. BG3, BG4, & BG5)*
Total Affected Community Population: *6,262*

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	*5,306*	*84.7%*

[6] This plan uses the FAA Recommended demographic groups from the U.S. Census.

Black or African American	*90*	*2.1%*
American Indian or Alaska Native	*7*	*0.1%*
Asian	*443*	*7.1%*
Native Hawaiian or Other Pacific Islander	*3*	*0.0%*
Hispanic or Latino	*251*	*4%*
Two or More	*341*	*5.4%*
Other	*72*	*1.1%*

Affected Community: Census Tract 1075 Total (BG1, BG2, BG3)
Total Affected Community Population: 4,878

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	*4,470*	*91%*
Black or African American	*46*	*0.9%*
American Indian or Alaska Native	*3*	*0.1%*
Asian	*108*	*2.2%*
Native Hawaiian or Other Pacific Islander	*4*	*0.1%*
Hispanic or Latino	*101*	*2.1%*
More than one	*203*	*4.2%*
Other	*44*	*0.9%*

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that The Pease Development Authority communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages[7] that are spoken in LEP households in the Affected Communities. The data source is Us Census American Community Survey for each of the Census Tracts here: Census Bureau Tables https://data.census.gov/table?t=Language%20Spoken%20at%20Home&g=060XX00US3301551620_1400000US33015107400

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 the PSM community is 308 (or 5% of the Total Affected Community population). Please refer to the end of this document to find data for all languages in our community.

[7] This plan uses the recommend language groups and data from the U.S. Census 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.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
None	N/A	N/A

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			
French/Haitian/Cajun	X			

Additional languages spoken by LEP persons in the Rockingham Planning Commission's Geographic area (Rockingham County, NH) other than Spanish and French include:

Additional Languages Spoken
Other Indo-European Languages
Other Asian Pacific Languages
Chinese
Russian/Polish/Slavic
German
Arabic
Other languages
Tagalog
Korean
Vietnamese

This information is updated annually[9] 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*
The Rockingham Planning Commission, Title VI Civil Rights & Non-Discrimination Policy	*https://www.therpc.org/application/files/5517/0231/5337/RPC-MPO-TitleVI-Plan-2022.pdf*
New Hampshire Department of Transportation	title-vi-implementation-plan.pdf (nh.gov)

[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.

Beneficiary Diversity.

Demographic information is collected from airport customers, attendees at airport community meetings, and businesses seeking opportunities at the airport, through voluntary disclosures via the demographic surveys as described below.

Description of Beneficiary Demographic Information Collection Methods

- The Airport will require that all non-federal contracts align with the same methodology used in the collection of information as required by federal contracts.
- Guest Wi-Fi log-in page will prompt visitors to a survey including voluntary demographic information from meeting attendees.
- The airport will invite all firms and organizations regardless of DBE certification, to attend a teleconference to review its 49 CFR Part 26 minimum Disadvantaged Business Enterprise (DBE) participation goal, calculation methodology, the effects of discrimination on opportunities for minority firms to perform work at the Airport and will answer any public questions/concerns on an tri-annual basis, during establishment of three-year DBE Goals
- Under 49 CFR Parts 23 and 26, the New Hampshire Department of Transportation certifies Disadvantaged Business Enterprises (DBEs) and Airport Concessions Disadvantaged on Airport projects with DBE and CDBE goals. Since those federal programs are race and gender neutral and were created to level the playing field for socially and economically disadvantaged groups that have historically been excluded from participating in federal procurement, when these firms are certified, their minority status, gender, and company information is uploaded to the New Hampshire Unified Certification Program (UCP) DBE Directory.
- Customer satisfaction surveys will be made available through the airport's free Wi-Fi log-in page for airport guests. The surveys will include a request for voluntary demographic information.
- Participants at business meetings, pre-bid meetings, and other public meetings will have access to surveys through the PDA office's guest Wi-Fi log-in page that prompts visitors to a survey that includes voluntary demographic information.
- The Pease Development Authority web page information and noise complaint pages will welcome responders to share voluntary demographic information to gauge direct impact.

Staff and Advisory Board Diversity.

Demographic information is collected from airport program employees and members of planning and advisory boards, through voluntary disclosures as described above.

- Employees are asked to submit voluntary confidential demographic information at the time of hiring.

7. Potential or Known Community Impacts

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. No Portsmouth International Airport activity will 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, without legitimate justification for the decision. 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 within the next 3 years:

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
Runway 16/34	*None*
Airline Terminal Building	*None*
Air Traffic Control Tower	*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
Taxiway Alpha North Reconstruction	*None*
Taxiway Alpha South Reconstruction	*None*
Taxiway Alpha South Holding Bay Reconstruction	*None*
Airline Terminal Building Arrivals Hall	*None*
Air Traffic Control Tower	*None*
Taxiway Alpha Reconstruction	*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?
Runway 16/34	*None*	*N/A*
Airline Terminal Building	*None*	*N/A*
Taxiway A North Reconstruction	*None*	*N/A*
Airline Terminal Arrivals Hall	*None*	*N/A*

[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.

Taxiway A South Reconstruction	*None*	*N/A*
Taxiway A South Holding Bay Reconstruction	*None*	*N/A*
Air Traffic Control Tower	*None*	*N/A*
Taxiway Delta Reconstruction	*None*	*N/A*

Justification:

The Airport's Environmental Justice Affected Communities data analysis found that none of the census tracts within the Airport's Affected Communities are deemed eligible as an Environmental Justice Community of Concern. As such no facilities or construction projects have disparate impacts to the Airport's Affected Communities. Note: The following table will remain as a place holder for future use if it is needed in future versions of this plan.

Facilities or Construction Projects	Justification
Add project name.	*Add justification.*

8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the Pease Development Authority will consider the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide.

According to the community statistical data in Section 6 above, no languages have been identified as languages spoken by LEP persons in Affected Communities, which meet the safe harbor threshold for written translation. Spanish and French are the languages most likely to be spoken by those LEP persons encountered at the airport.

The Pease Development Authority also collects data for languages spoken by airport guests.[11] PSM is an International Airport and US Port of Entry with on-site US Customs and Border Protection services. At the time of this writing the airport does not have scheduled international airline service but is a technical stop for flights entering the US mostly from Canadian and European origins. Most of the passengers and all the flight crews are English proficient.

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 language line usage data	*www.languageline.com*
Airline-provided data	*N/A*
Fixed Base Operator/Line Service Operator	*www.portcityair.com*
U.S. Customs and Border Protection	*www.cbp.gov*
Assumption from flight origin / destination	*N/A*
Assistance requests to airport information desks	*N/A*

Based on the above data, at the time of this writing the following additional languages have been identified as likely to be spoken by LEP airport guests:

Language
French (including French Canadian)
Spanish
Italian
Ukrainian/Slavic
Russian

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 Pease Development 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
Ascentria Community Services, Inc. d/b/a "The Language Bank" - https://thelanguagebank.org/	*All above languages*

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport Information Booth – Airport Customer Service and Security Personnel will be trained to use "Google Translate" to provide on-demand translation services	*All above languages*

Airport website translate view – Airport Website is compatible with web browser translation features	*All above languages*

Interpretation Services:

- The following vendors have been identified for interpretation services:
  a. Ascentria Community Services, Inc. d/b/a "The Language Bank" https://thelanguagebank.org/ – NH Department of Employment Security

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport information desks	*Upon Request.*

Description of Interpretation Assistance Processes

- Airport Customer Service Staff are available in the Airport Terminal Building to assist passengers, and staff the airport information booth and various checkpoints during passenger flights. Staff have access to Google Translate to assist LEP passengers.
- The airport is actively exploring more comprehensive website translation services.
- The airport is actively exploring available AI Generated Speech Translation or voice to text translation solutions, such as smart phone applications.

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 local public transportation providers 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
None	*Coast Bus - Public Transportation For The NH Seacoast | COAST Bus*	*Existing*

	www.coastbus.org	
None	*C&J Trailways Bus www.ridecj.com*	*Existing*
None	*Greyhound Bus, 54 Hanover St. Portsmouth. Service from Downtown Portsmouth to multiple destinations. No Airport Connection*	*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:

Airport Business Opportunity	Minority Business Outreach Methods
All DOT Federally Funded Airport Business Opportunities	• *The Pease Development Authority (PDA) has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation (DOT). This includes minority and woman owned businesses (WBE).* • *Geographic extents of "ready, willing and able" DBE/WBE prime contractors or subcontractors are determined by a 40-mile radius of the airport using NH DOT, Maine DOT and MA DOT DBE/WBE directories, and includes DBEs outside of that geographic range that have previously done business with the PDA on past contracts.* • *Before establishing the overall DBE goals for a 3-year period, the Pease Development Authority conducts an outreach program via an online MS Teams meeting for minority, woman's and general contractor groups, community organizations and other officials or organizations to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Pease Development Authority's efforts to establish an equitable process for the participation of DBEs.* • *Ensuring that Prime Contracts are available as opportunities to any businesses, including minority, woman owned and disadvantaged businesses.* • *Establishing monetary percentage goals within certain prime contracts for inclusion of DBEs and WBE's as subcontractors under the prime contract; or, encouraging meeting those goals as a DBE and/or WBE Prime Contractor. This is achieved during solicitation of bids.*

	• *During execution of a contract containing DBE or WBE goals, monitoring the percentages actual monetary expenditures is as required in a given contract.*
All Airport Business Opportunities	• *Standard Pease Development Authority language is used on all solicitations to prevent exclusion of minority, woman owned and disadvantaged businesses.*

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 Pease Development Authority Engineering 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 biannually.

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[12]
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements[13]

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, Portsmouth 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[14]
3. Allege misconduct by the Pease Development Authority, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the Pease Development Authority, 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

[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.

identity), creed, or age has the right to file a complaint with the Pease Development Authority.[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 the complaint and promptly send copies of the complaint to the office with the appropriate jurisdiction and the Executive Director.

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

Andrew B. Pomeroy, C.M.
Director, Aviation Planning and Regulatory Compliance
Portsmouth International Airport at Pease
36 Airline Avenue
Portsmouth, NH 03801

603-766-9231; a.pomeroy@peasedev.org
https://flypsmairport.com/community/nondiscrimination-titlevi/

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 180 days*.

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 uploads information to the FAA Civil Rights Connect System, which issues automated notifications to the FAA Staff. 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 Portsmouth International 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 negotiations or other dispute resolution methods, as determined appropriate by the Pease Development Authority.

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 Pease Development Authority'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 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 Pease Development Authority will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. Pease Development Authority 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 Pomeroy.

This complaint procedure is shared with the public through the following methods: on the Pease Development Authority website and emailed upon request.
https://flypsmairport.com/accessibility-statement/
https://flypsmairport.com/community/nondiscrimination-titlevi/

Appendix A
Population / Language Data

- ***U.S. Census Bureau data Table S1701, "Poverty Status in the Past 12 Months"***
    - **https://data.census.gov/table?q=S1701**

- ***U.S. Census Bureau data Table B16001, "Language Spoken at Home by Ability to Speak English."***
    - **https://data.census.gov/table/ACSDT1Y2019.B16001?q=B16001**

Note: Above Referenced Data Tables, change every 12 months and are Searchable by demographic. They are too voluminous to reproduce in this document but are easily accessible via links provided above.

Appendix B
Completed Unlawful Discrimination Poster
https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/

Unlawful Discrimination

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

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

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

Coordinator: Andrew B. Pomeroy
Phone: 603.766.9231
Address: 36 Airline Ave
Portsmouth, NH 03801
a.pomeroy@peasedev.org

Discriminacion Ilegal

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

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

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

Coordinador: Andrew B. Pomeroy
Teléfono: 603.766.9231
Dirección: 36 Airline Ave
Portsmouth, NH 03801
a.pomeroy@peasedev.org

U.S. Department of Transportation
Federal Aviation Administration

HQ-101098

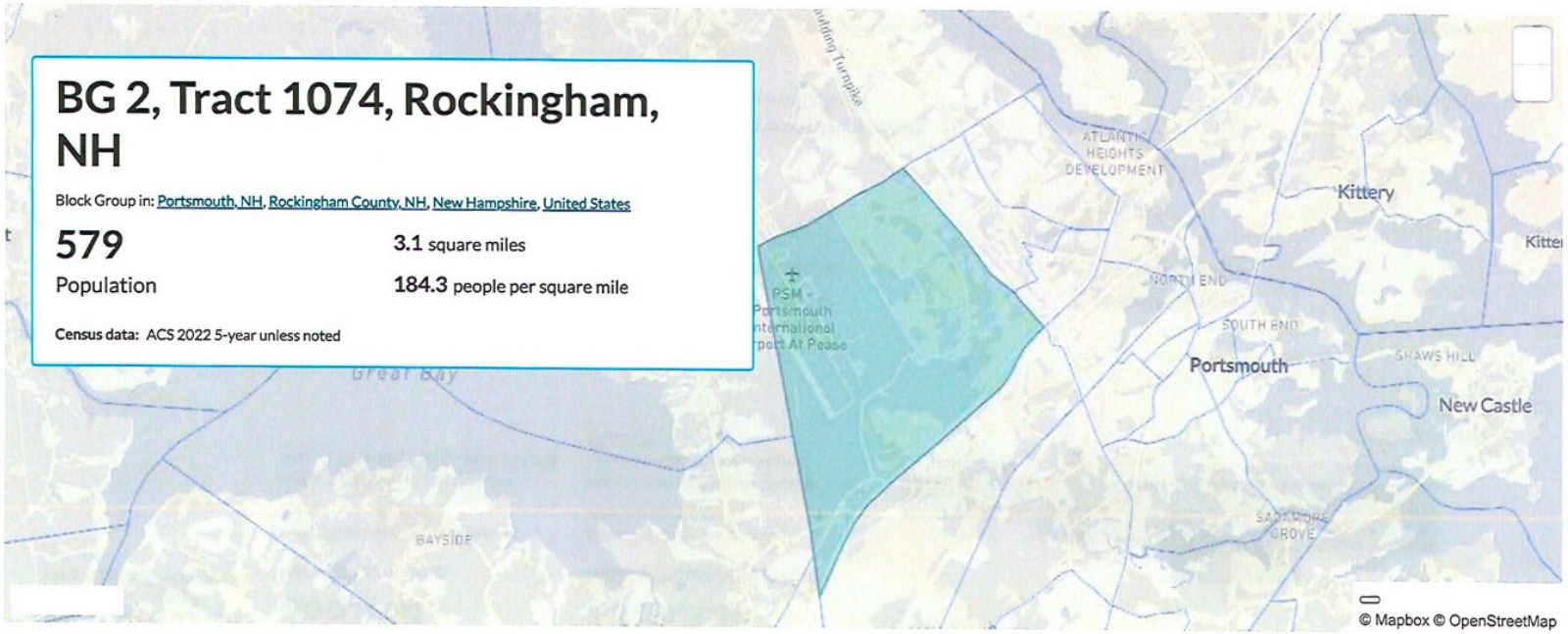
Appendix C
PSM Community Participation Plan (CPP)

The PSM Community Participation Plan (CPP) will be attached as Appendix C upon Federal Aviation Administration (FAA) approval of the CPP.

Appendix C
PSM Identified Affected Communities Location Maps
US Census Block Group (BG) Areas

Census Reporter

Search for places, tables, topics, or glossaries Search



BG 2, Tract 1074, Rockingham, NH

Block Group in: Portsmouth, NH, Rockingham County, NH, New Hampshire, United States

579
Population

3.1 square miles

184.3 people per square mile

Census data: ACS 2022 5-year unless noted

Find data for this place Search by table or column name...

Hover for margins of error and contextual data.

Demographics

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

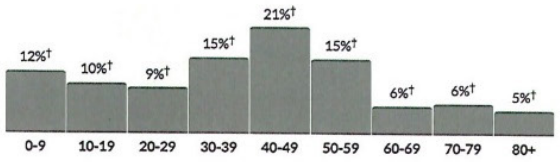
Age

41.9
Median age

about the same as the figure in Portsmouth: 42.1

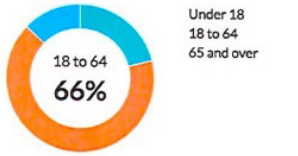
a little less than the figure in Rockingham County: 44.7

Population by age range



Show data / Embed

Population by age category



Show data / Embed

Census Reporter

Search for places, tables, topics, or glossaries Search

BG 1, Tract 1075, Rockingham, NH

Block Group in: Rockingham County, NH, New Hampshire, United States

964
Population

8.1 square miles

118.9 people per square mile

Census data: ACS 2022 5-year unless noted

Find data for this place Search by table or column name...

Hover for margins of error and contextual data.

Demographics

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

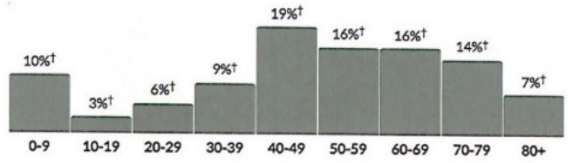
Age

53.7
Median age

about 20 percent higher than the figure in Rockingham County: 44.7

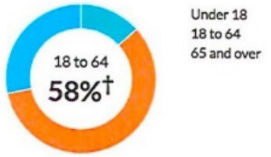
about 25 percent higher than the figure in New Hampshire: 43.1

Population by age range



Show data / Embed

Population by age category



Show data / Embed

Census Reporter

Search for places, tables, topics, or glossaries Search

BG 2, Tract 1072, Rockingham, NH

Block Group in: Portsmouth, NH, Rockingham County, NH, New Hampshire, United States

1,218
Population

1.6 square miles

757.3 people per square mile

Census data: ACS 2022 5-year unless noted

Find data for this place Search by table or column name...

Hover for margins of error and contextual data.

Demographics

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

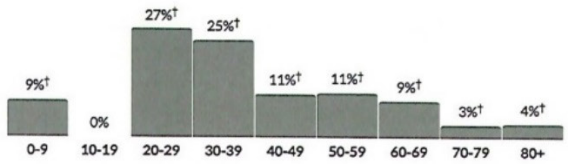
Age

34.7
Median age

about 80 percent of the figure in Portsmouth: 42.1

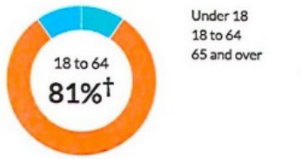
about 80 percent of the figure in Rockingham County: 44.7

Population by age range



Show data / Embed

Population by age category



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