

## Port Of Portland Title VI Plan

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

Port Of Portland 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.

Port Of Portland 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 Port Of Portland 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 Port Of Portland will take action to involve them and the general public in the decision making process.

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

Amber Page, available at (503)432-7282 and [Amber.Page@PortofPortland.com](mailto:Amber.Page@PortofPortland.com), is responsible for overseeing the Port Of Portland 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.

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**Signature**

Bobbi Matthews  
Director of Admin. Services

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August 1, 2023

**Effective Date**

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August 1, 2026

**3-Year Expiration Date**

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

## **2. Administration**

Port of Portland Board of Commissioners has reviewed and adopted this Title VI Plan for Port Of Portland. 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 or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Port of Portland Board of Commissioners and resubmittal to FAA.

In addition to the Coordinator and Port Of Portland leadership, the following people also assist with our Title VI program requirements:

Staff Supporting Title VI Program	Port Of Portland Program / Office
Amber Page	ACDBE/Small Business/Title VI Compliance Officer
Jill McPherson	Customer Relations Supervisor/ ADA Coordinator

Port Of Portland has the following airport program sub-recipients:

### **Sub-Recipients**

PDX- Portland International Airport

As of the date of this plan Port Of Portland. has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
FAA- PDX South Runway PCC Panel/ Joint Rehab	3-41-0048-091	\$1,301,489
FAA- PDX Ground Source Heating	3-41-0048-093	\$6,000,000
FAA- PDX Master Plan		
FAA- Runway 13R/31L RSA Design & Construction	3-41-0025-032-2023	\$8,563,208

In addition the Port Of Portland. 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
N/A	N/A	N/A

### **3. Grant and Procurement Assurances**

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

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

#### **Clauses/Covenants**

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See [https://www.faa.gov/airports/aip/procurement/federal\\_contract\\_provisions/](https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/). Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. Port Of Portland requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. Additionally, based on contracting needs, compliance meetings are held regularly to ensure that small business are being utilized on contracts with obligations to small businesses. Additionally, our procurement process includes ‘pre-bid’ open house. These open houses are open to the public and target certified firms with the intention of highlighting the strong commitment The Port has to our shared prosperity initiatives. Additionally, we include the following language in our contracts to ensure contractual requirements in line with the Title IV requirements.
  - Title VI List of Pertinent Nondiscrimination Acts and Authorities
    - During the performance of this contract, the Contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “Contractor”) agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:
    - Title VI of the Civil Rights Act of 1964 (42 USC § 2000d et seq., 78 stat. 252) (prohibits discrimination on the basis of race, color, national origin);
    - 49 CFR part 21 (Non-discrimination in Federally-Assisted programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964);
    - The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 USC § 4601) (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
    - Section 504 of the Rehabilitation Act of 1973 (29 USC § 794 et seq.), as amended (prohibits discrimination on the basis of disability); and 49 CFR part 27 (Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance);
    - The Age Discrimination Act of 1975, as amended (42 USC § 6101 et seq.) (prohibits discrimination on the basis of age);
    - Airport and Airway Improvement Act of 1982 (49 USC § 47123), as amended

- (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987 (PL 100-259) (broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act of 1990 (42 USC § 12101, et seq) (prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities) as implemented by U.S. Department of Transportation regulations at 49 CFR parts 37 and 38;
- The Federal Aviation Administration’s Nondiscrimination statute (49 USC § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (ensures nondiscrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations);
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs [70 Fed. Reg. 74087 (2005)];
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 USC § 1681, et seq).
- Compliance with Nondiscrimination Requirements
- During the performance of this contract, the Contractor, for itself, its assignees, and successors in interest (hereinafter referred to as “the Contractor”) agrees as follows:
- Compliance with Regulations
- The Contractor (hereinafter includes consultants) shall comply with the Title VI List of Pertinent Nondiscrimination Acts and Authorities, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
- Nondiscrimination
- The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin (including limited English proficiency), creed, sex (including sexual orientation and gender

identity), age, or disability in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate directly or indirectly in the discrimination prohibited by the Nondiscrimination Acts and Authorities, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR part 21.

- Solicitations for Subcontracts, including Procurements of Materials and Equipment
- In all solicitations, either by competitive bidding, or negotiation made by the Contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the Contractor's obligations under this contract and the Nondiscrimination Acts and Authorities relative to nondiscrimination on the grounds of race, color, or national origin.
- Information and Reports
- The Contractor shall provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Port or the FAA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the Contractor shall so certify to the Port or the FAA, as appropriate, and shall set forth what efforts it has made to obtain the information.
- Sanctions for Noncompliance
- In the event of a Contractor's noncompliance with the nondiscrimination provisions of this contract, the Port will impose such contract sanctions as it or the FAA may determine to be appropriate, including, but not limited to:
- Withholding payments to the Contractor under the contract until the Contractor complies; and/or
- Cancelling, terminating, or suspending a contract, in whole or in part

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

*Subcontract template must be used in all subcontracts related to the airport program. Subcontracts are audited by the Procurement Dept. 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 Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that the Port Of Portland is in compliance with nondiscrimination requirements of Title VI and reports to Port Of Portland 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 Port Of Portland 's leadership.
- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

See Notice, Compliance reviews, Audits, Lawsuits, and Other Investigations, and Complaints Sections of this Plan.

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

**5. Notice**  
49 CFR Part 21 Appendix C(b)(2)(ii)

Port Of Portland 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,<sup>2</sup> and maintained. The poster template is available at [https://www.faa.gov/about/office\\_org/headquarters\\_offices/acr/com\\_civ\\_support/non\\_disc\\_pr/](https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/) and a completed copy is attached. See Section 15 Appendix.

Port Of Portland has posted the above Title VI policy statement at its staff offices.

Port Of Portland will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by July 30, 2023, via email.

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

<b>Terminal/FBO/Concessions/ Other Locations</b>	<b>Quantity in Pre-Security Area</b>	<b>Quantity in Post-Security Area</b>	<b>Additional Quantities</b>
Each Terminal	3	3	0

**Outreach to Affected Communities**

Shared Prosperity Office 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. Shared Prosperity Office contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities<sup>3</sup> and provide important feedback on translated materials. The office maintains records of all such notices and the efforts made to reach each of the Affected

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

<sup>3</sup> We will not subject any persons to discrimination based on race, color, national origin, age, sex, or creed. The term “protected communities” is used within this Title VI Plan to highlight the requirements of Title VI, 49 U.S.C. § 47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898.

Communities.

Detailed information on our public notice and outreach procedures is available in the Port Of Portland CPP. A copy of the CPP will be available at <https://www.portofportland.com>. A copy of each CPP report completed since the last Title VI Plan is N/A

Port Of Portland will create a detailed CPP by September 31<sup>st</sup>, 2023. A copy of the plan will be available at <https://www.portofportland.com>.

To ensure that the community is effectively informed of and able to participate in public hearings, the Shared Prosperity 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 Port Of Portland will be able to identify, understand, and engage with communities. In doing so, the Port Of Portland needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by Port Of Portland’s airport program.

Affected Communities <sup>4</sup>	Population
Portland Metro Area	2,510,696

(Hereafter, the above communities will be referred to collectively as “the Affected Communities”).

We have identified the following facts about the Affected Communities:

Low Income Communities.

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,” Port Of Portland is collecting information about affected and potentially affected low-income communities. According to U.S. Census Report, such as S1701, the overall poverty level for Portland Metro area is approximately **7.9 %**.

Affected Communities	Poverty Rate
Portland Metro Area	7.9%

<sup>4</sup> “Affected communities” means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.



### Racial and Ethnic Communities.

Demographic data for race, color, and national origin was evaluated to identify racial and ethnic communities and populations in each Affected Community. The demographic composition by race, color, or national origin for the specific Affected Communities are as follows<sup>5</sup>: Portland Metro Area

**Affected Community: Portland Metro Area**  
**Total Affected Community Population: 2,510,696**

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	327281	77%
Black or African American	306278	6%
American Indian or Alaska Native	251653	1%
Asian	19507	6%
Native Hawaiian or Other Pacific Islander	2273	1%
Hispanic or Latino	38915	3%
More than one	21003	6%

### Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that Port Of Portland communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>6</sup> that are spoken in LEP households in the Affected Communities. The data source is EJSSCREEN.EPA.GOV.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.<sup>7</sup> The safe harbor for our community is 5.63%. Please refer to the end of this document to find data for all languages in our community.

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<sup>5</sup> Recommend using demographic groups from the U.S. Census.

<sup>6</sup> Recommend using language groups from the U.S. Census, and using data for the “Speak English less than ‘very well’” category for each language over the threshold.

<sup>7</sup> See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
English	255658	+/-1,182
Spanish	25522	+/-1264
French, Haitian, or Cajun	1646	+/-241
German or other West Germanic	1220	+/-125
Russian, Polish, or Other Slavic	6397	+/-550
Other Indo-European	3208	+/-372
Korean	509	+/-136
Vietnamese	2123	+/-244
Tagalog (including Filipino)	1418	+/-461
Other Asian and Pacific Island	5532	+/-260
Arabic	304	+/-495
Other	2380	+/-170
Total Non- English	55213	+/-261

See Table B16001: Language Spoken at Home by Ability to Speak English]

### Additional Languages Spoken

#### 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 Customer Service Office conducts biannual surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey includes a voluntary request for demographic information.*
- *Participants at 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.

#### 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.*

## **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 Port Of Portland activity must have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.<sup>8</sup>

The following airport facilities are already in use or under construction and expected to be in use within the next 3 years:

<b>Existing Airport Facilities</b>	<b>Affected Community Impacted by Operation of the Facility</b>
N/A	N/A

The following airport facility projects (including all alternatives) are in construction or expected to be in construction within the next 3 years: **N/A**

<b>Airport Facility Construction Projects</b>	<b>Affected Community Impacted by Construction of the Facility</b>
N/A	N/A

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: **N/A**

<b>Facilities or Construction Projects with Disparate Impacts</b>	<b>Affected Community Impacted</b>	<b>Impact Can Be Eliminated?</b>
N/A	N/A	N/A

**Justifications:**  
**NA**

<b>Facilities or Construction Projects</b>	<b>Justification</b>
N/A	N/A

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<sup>8</sup> In order to carry out an alternative with a discriminatory impact, the Port Of Portland 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.

## **Limited English Proficiency (LEP)**

### **Executive Order 13166**

In creating a Language Assistance Plan, the Port Of Portland 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

<b>Language</b>
Spanish
French, Haitian, or Cajun
German or other West Germanic
Russian, Polish, or Other Slavic
Other Indo-European
Korean
Vietnamese
Tagalog (including Filipino)
Other Asian and Pacific Island
Arabic
Other and/or unspecified

Port Of Portland also collects data for languages spoken by airport guests.<sup>9</sup> Data sources include:

<b>Data Sources for Languages Spoken by Airport Guests</b>	<b>Website link to Data Source</b>
Community Language Data	<a href="https://ejscreen.epa.gov/">https://ejscreen.epa.gov/</a>

Based on the above data, the following additional languages have been identified as likely to be spoken by LEP airport guests: N/A, all listed above.

<b>Language</b>
N/A

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 Port Of Portland 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:

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<sup>9</sup> We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language was not available beforehand, or the safe harbor threshold for written translation was not met.

**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: Language Line

Translation Vendors	Languages
Language Line	240 languages offered- list available at <a href="http://Languageline.com">Languageline.com</a> .

- Information regarding translation services can be obtained at: Customer Service via telephone

Location for Translation Assistance	Languages
Language Line	240 languages offered- list available at <a href="http://Languageline.com">Languageline.com</a> .

**Interpretation Services:**

- The following vendors have been identified for interpretation services: Language Line

Interpretation Vendors	Languages
Language Line	240 languages offered- list available at <a href="http://Languageline.com">Languageline.com</a> .

- Information regarding interpretation services can be obtained at: Customer Service via telephone

Location for Interpretation Assistance	Languages
N/A	N/A
Language Line	240 languages offered- list available at <a href="http://Languageline.com">Languageline.com</a> .

**Description of Interpretation Assistance Processes**

- Language Line services can be accessed by the following Port workgroups. Operations/Police/Fire/Emergency Communications Ctr/Paging and Information/Volunteers/ABM/TSA and CBP.
- The typical interaction for my workgroups is; a guest calls and requests interpretive services. If the interpretive services are requested for a face-to-face interaction, i.e. PDX Volunteers or ABM, then the phone used to contact the interpreter is passed back and forth between the guest and the Port representative.
- Questions range from “how much is parking” or “how do I get to the airport” to “what airlines offer flights to city X”
- Language Line the service can accommodate as many as X world languages.

## **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 Tri-Met to encourage them to provide transit service access between the airport and these areas.

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

<b>Minority and/or Disadvantaged Community Areas</b>	<b>Transit Service</b>	<b>Planned or Existing</b>
Portland Metro Area	Tri-Met Redline MAX	Existing

## **10. Minority Businesses**

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

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

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
In Airport Concessions	RFP process with multiple stakeholders as evaluators. This process includes a point system that allows for certified minority owned small businesses to be allotted the same success as large companies. Open houses are held as informational sessions to ensure success of small businesses.
Construction	RFP process with multiple stakeholders as evaluators. This process includes a point system that allows for certified minority owned small businesses to be allotted the same success as large companies. Open houses are held as informational sessions to ensure success of small businesses. "Pre-BID" meetings are held as informational sessions to ensure success of small businesses. Workforce requirements and small business utilization percentages are pre-determined and required to be fulfilled.
Professional Services	RFP process with multiple stakeholders as evaluators. This process includes a point system that allows for certified minority owned small businesses to be allotted the same success as large companies. Open houses are held as informational sessions to ensure success of small

	businesses. "Pre-BID" meetings are held as informational sessions to ensure success of small businesses.
Rental Car Center	Industry specific open house is held yearly to connect small businesses to RCC.

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 Procurement and Contracting.

## **11. Training**

New employee orientation incorporates Title VI training. Topics include:

- Title VI and related laws prohibit discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age
- Title VI complaints must be forwarded to the Coordinator
- Protections against retaliation for filing civil rights complaints or related actions
- Title VI notices must be displayed throughout the airport public facilities
- All contracts must include Title VI clauses
- Language interpretation and translation services
- Cultural and community relations sensitivity training
- Anti-harassment training

Refresher information will be provided annually.

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

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

- Compliance reviews or audits concerning civil rights requirements<sup>10</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>11</sup>

As discussed in the Title VI Complaints Section, Title VI complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, Port Of Portland 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)

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<sup>10</sup> Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the Port Of Portland or any of its sub-recipients by any State, local or Federal agency.

<sup>11</sup> Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the Port Of Portland itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.



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

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters<sup>12</sup>
3. Allege misconduct by the Port Of Portland or its sub-recipients, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the Port Of Portland 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 Port Of Portland.<sup>13</sup> Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

**Receipt of Complaint.** The Coordinator will log in the complaint and promptly send copies of the complaint to Shared Prosperity Office management and any applicable departments.

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

**Amber Page, Title VI Coordinator**

(503)432-7282

[Amber.Page@PortofPortland.com](mailto:Amber.Page@PortofPortland.com)

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.

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<sup>12</sup> Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Port Of Portland employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

## **Discrimination Complaint Referral Procedure**

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within 72 hours.

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

## **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 Portland 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 collaboration with Shared Prosperity Office and Legal Department on a case by case bases.

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 Portland International 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 preferably 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 Title VI Coordinator.
- The written appeal must be received within 180 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 Portland International Airport will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. Portland International 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 Title VI Coordinator.

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

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

1 Airport website, <https://www.flypdx.com/Contact>

2 Posted signs throughout airport

**14. Population / Language Data**

S1701-2021	Portland-South Portland, ME Metro Area			
	Total		Below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	546,342	±1,784	42,940	±6,982
AGE				

Under 18 years	99,588	±945	10,058	±3,981
Under 5 years	24,582	±809	2,388	±1,290
5 to 17 years	75,006	±1,012	7,670	±2,889
Related children of householder under 18 years	99,477	±968	9,947	±3,974
18 to 64 years	334,324	±1,851	24,362	±3,597
18 to 34 years	107,936	±2,050	8,748	±1,641
35 to 64 years	226,388	±2,039	15,614	±2,898
60 years and over	155,541	±2,609	13,013	±2,000
65 years and over	112,430	±1,201	8,520	±1,380
SEX				
Male	266,550	±1,946	17,700	±3,325
Female	279,792	±1,509	25,240	±4,506
RACE AND HISPANIC OR LATINO ORIGIN				
White alone	482,539	±5,058	35,659	±6,571
Black or African American alone	11,732	±1,476	2,919	±1,794
American Indian and Alaska Native alone	N	N	N	N
Asian alone	N	N	N	N
Native Hawaiian and Other Pacific Islander alone	N	N	N	N
Some other race alone	N	N	N	N
Two or more races	35,885	±5,042	2,348	±1,004
Hispanic or Latino origin (of any race)	11,184	±462	360	±259
White alone, not Hispanic or Latino	480,067	±4,939	35,419	±6,559
EDUCATIONAL ATTAINMENT				
Population 25 years and over	409,746	±1,703	29,359	±3,929
Less than high school graduate	16,676	±2,430	5,099	±1,475
High school graduate (includes equivalency)	94,038	±5,097	10,111	±2,404
Some college, associate's degree	113,510	±6,160	7,921	±1,610
Bachelor's degree or higher	185,522	±6,346	6,228	±1,543

EMPLOYMENT STATUS				
Civilian labor force 16 years and over	301,505	±4,305	9,331	±1,980
Employed	288,303	±4,615	7,173	±1,795
Male	149,201	±3,425	2,635	±847
Female	139,102	±3,036	4,538	±1,499
Unemployed	13,202	±1,951	2,158	±933
Male	6,854	±1,366	654	±474
Female	6,348	±1,497	1,504	±776
WORK EXPERIENCE				
Population 16 years and over	458,821	±2,060	33,930	±4,383
Worked full-time, year-round in the past 12 months	204,887	±5,122	2,169	±914
Worked part-time or part-year in the past 12 months	113,480	±4,817	8,372	±1,651
Did not work	140,454	±4,779	23,389	±3,257
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS				
50 percent of poverty level	21,958	±5,103	(X)	(X)
125 percent of poverty level	54,960	±7,374	(X)	(X)
150 percent of poverty level	68,138	±7,468	(X)	(X)
185 percent of poverty level	89,174	±7,369	(X)	(X)
200 percent of poverty level	101,821	±7,302	(X)	(X)
300 percent of poverty level	178,908	±10,413	(X)	(X)
400 percent of poverty level	264,154	±10,412	(X)	(X)
500 percent of poverty level	333,763	±10,395	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	127,967	±6,052	22,555	±2,518

Male	59,026	±4,007	8,358	±1,536
Female	68,941	±3,578	14,197	±1,987
15 years	44	±76	44	±76
16 to 17 years	67	±111	67	±111
18 to 24 years	8,942	±2,282	2,845	±1,021
25 to 34 years	29,056	±2,833	3,310	±1,025
35 to 44 years	14,260	±2,413	1,627	±604
45 to 54 years	13,569	±2,261	3,169	±963
55 to 64 years	25,062	±2,824	5,184	±1,372
65 to 74 years	21,352	±2,092	3,502	±860
75 years and over	15,615	±1,424	2,807	±759
Mean income deficit for unrelated individuals (dollars)	7,569	±639	(X)	(X)
Worked full-time, year- round in the past 12 months	57,014	±4,382	1,088	±581
Worked less than full-time, year-round in the past 12 months	27,592	±3,176	5,077	±1,207
Did not work	43,361	±3,340	16,390	±2,156
Population in housing units for whom poverty status is determined	544,359	±1,873	41,624	±6,939

<b>B10061- 2021</b>	<b>Portland-South Portland, ME Metro Area</b>	
<b>Label</b>	<b>Estimate</b>	<b>Margin of Error</b>
Total:	495,255	±130
Speak only English	459,773	±1,560
Spanish or Spanish Creole:	5,958	±741
Speak English "very well"	4,560	±654
Speak English less than "very well"	1,398	±315
French (incl. Patois, Cajun):	12,538	±807
Speak English "very well"	9,986	±695
Speak English less than "very well"	2,552	±387

French Creole:	199	±154
Speak English "very well"	199	±154
Speak English less than "very well"	0	±22
Italian:	585	±151
Speak English "very well"	493	±140
Speak English less than "very well"	92	±63
Portuguese or Portuguese Creole:	340	±135
Speak English "very well"	295	±122
Speak English less than "very well"	45	±43
German:	1,204	±273
Speak English "very well"	1,078	±259
Speak English less than "very well"	126	±71
Yiddish:	38	±47
Speak English "very well"	31	±47
Speak English less than "very well"	7	±11
Other West Germanic languages:	302	±173
Speak English "very well"	230	±151
Speak English less than "very well"	72	±91
Scandinavian languages:	198	±106
Speak English "very well"	188	±100
Speak English less than "very well"	10	±15
Greek:	306	±134
Speak English "very well"	233	±99
Speak English less than "very well"	73	±62
Russian:	922	±350
Speak English "very well"	626	±293
Speak English less than "very well"	296	±130
Polish:	272	±132
Speak English "very well"	168	±86
Speak English less than "very well"	104	±71
Serbo-Croatian:	381	±212
Speak English "very well"	225	±142

Speak English less than "very well"	156	±101
Other Slavic languages:	314	±154
Speak English "very well"	235	±116
Speak English less than "very well"	79	±66
Armenian:	31	±47
Speak English "very well"	31	±47
Speak English less than "very well"	0	±22
Persian:	555	±349
Speak English "very well"	397	±262
Speak English less than "very well"	158	±141
Gujarati:	163	±191
Speak English "very well"	163	±191
Speak English less than "very well"	0	±22
Hindi:	192	±138
Speak English "very well"	189	±136
Speak English less than "very well"	3	±6
Urdu:	205	±217
Speak English "very well"	119	±170
Speak English less than "very well"	86	±137
Other Indic languages:	154	±141
Speak English "very well"	78	±68
Speak English less than "very well"	76	±89
Other Indo-European languages:	221	±111
Speak English "very well"	129	±68
Speak English less than "very well"	92	±77
Chinese:	1,056	±330
Speak English "very well"	584	±207
Speak English less than "very well"	472	±192
Japanese:	301	±187
Speak English "very well"	242	±178
Speak English less than "very well"	59	±40
Korean:	176	±93
Speak English "very well"	90	±60



Speak English less than "very well"	86	±48
Mon-Khmer, Cambodian:	895	±353
Speak English "very well"	411	±185
Speak English less than "very well"	484	±212
Hmong:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Thai:	96	±53
Speak English "very well"	68	±47
Speak English less than "very well"	28	±28
Laotian:	43	±52
Speak English "very well"	36	±44
Speak English less than "very well"	7	±13
Vietnamese:	1,443	±353
Speak English "very well"	747	±231
Speak English less than "very well"	696	±184
Other Asian languages:	719	±395
Speak English "very well"	289	±210
Speak English less than "very well"	430	±300
Tagalog:	929	±311
Speak English "very well"	550	±193
Speak English less than "very well"	379	±188
Other Pacific Island languages:	149	±84
Speak English "very well"	127	±73
Speak English less than "very well"	22	±38
Navajo:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Other Native North American languages:	67	±52
Speak English "very well"	61	±51
Speak English less than "very well"	6	±9
Hungarian:	10	±12

Speak English "very well"	10	±12
Speak English less than "very well"	0	±22
Arabic:	1,740	±584
Speak English "very well"	799	±306
Speak English less than "very well"	941	±402
Hebrew:	88	±74
Speak English "very well"	80	±71
Speak English less than "very well"	8	±13
African languages:	2,592	±459
Speak English "very well"	1,188	±230
Speak English less than "very well"	1,404	±302
Other and unspecified languages:	100	±75
Speak English "very well"	92	±72
Speak English less than "very well"	8	±13

## 15. Completed Unlawful Discrimination Poster

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### Unlawful Discrimination

It is unlawful for airport operators and their lessees, tenants, concessionaires and contractors to discriminate against any person because of race, color, national origin, sex, creed, or disability in public services and employment opportunities. Allegations of discrimination should be promptly reported to the 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:** Amber Page, Title VI Coordinator  
**Phone:** (503)432-7282  
**Address:** 7200 NE Airport Way, Portland, OR 97218

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### Discriminación 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:** Amber Page, Title VI Coordinator  
**Teléfono:** (503)432-7282  
**Dirección:** 7200 NE Airport Way, Portland, OR 97218



U.S. Department of Transportation  
Federal Aviation Administration