

Asheville Regional Airport Title VI Plan

1. Title VI Policy Statement¹

The Greater Asheville Regional Airport Authority (GARAA) 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.

GARAA further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not. The Airport Sponsor agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. Anytime communities may be impacted by programs or activities the **GARAA** will take action to involve them and the general public in the decision making process.

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

Tina Kinsey, Vice President Marketing, Public Relations + Air Service Development available at 828-684-2226 and tkinsey@flvavl.com, is responsible for overseeing GARAA’s compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.



Signature

Lew Bleiweis, A.A.E.

President + CEO

12-31-2023

Effective Date

12-31-2026

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 Greater Asheville Regional Airport Authority (GARAA) has reviewed and adopted this Title VI Plan for Asheville Regional Airport (AVL). 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 CEO’s or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Authority and resubmittal to FAA.

In addition to the coordinator and airport sponsor’s leadership, the following departments also assist with our Title VI program requirements:

Staff Supporting Title VI Program	Airport Sponsor Program / Office
Anna Henderson	Planning Department
Heather Pfeffer	Marketing Department

Source: Airport staff

GARAA has the following airport program sub-recipients:

Sub-Recipients
None.

As of the date of this plan, GARAA has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
BIL - ATP	Not assigned at this time	\$15,000,000
BIL – ATP	Not assigned at this time	\$20,000,000

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

Federal Source	Grant Award Information Available at:
FAA AIP	https://www.faa.gov/airports/aip/

3. Grant and Procurement Assurances

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

GARAA 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, 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. **GARAA** requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements with contractors, vendors and service providers for federally funded projects.

Description of Oversight Methods for Subcontracts

Annually, the Title VI Coordinator will collaborate with the Planning and Business Development Departments to review subcontractor agreements on a reasonable sample basis to assure required Title VI clauses are in place, and the sample audit results will be documented.

4. Title VI Coordinator Responsibilities

The Coordinator is responsible for ensuring that they and other staff supporting the Title VI are trained in Title VI requirements. Essential training topics include:

- Basic Title VI requirements
- Airport language assistance resources and practices
- Collecting and assessing demographic data
- Reporting Title VI complaints and other required FAA notifications.

See Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that the Airport Sponsor is in compliance with nondiscrimination requirements of Title VI and reports to GARAA leadership on the status of Title VI compliances.
- Responds promptly to requests by FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI and related requirements.
- Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.
- Provides the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
- Annually reviews the airport's Title VI plan and disseminates information throughout

staff and the Airport Sponsor's leadership.

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

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

The Coordinator *has* 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)

GARAA 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,¹ and maintained. The poster template is available at

https://www.faa.gov/about/office_org/headquarters_offices/act/com_civ_support/non_disc_pr/ and a completed copy is attached. See Section 14 Appendix.

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

GARAA will make this Title VI Plan available to its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed after approval from the FAA by email and posted on the AVL website.

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

¹ For more information about website accessibility, please visit ADA.gov.

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
<i>Airport Terminal – Guest Services</i>	<i>1</i>		
<i>Rental Car Area</i>	<i>1</i>		
<i>Airline ticket counter area</i>	<i>1</i>		
<i>Airport Administrative Office – front desk</i>	<i>1</i>		
<i>Airport Dept of Public Safety – lobby</i>	<i>1</i>		
<i>Restaurant Areas in terminal</i>		<i>2</i>	
<i>FBO – Signature Flight Support</i>	<i>1</i>		
<i>WNC Aviation – Flight School</i>	<i>1</i>		
<i>Marathon Gas Station</i>	<i>1</i>		
<i>Parking facility</i>	<i>1</i>		

Source: Airport staff

Outreach to Affected Communities

The Marketing Department will include impacted communities in the distribution of notices or public meetings. Announcements may be made using a combination of social media, general circulation newspapers, community newspapers, airport website and/or email broadcast. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

GARAA will create a detailed CPP for Asheville Regional Airport by June 1, 2024. A copy of the plan will be available at **the GARAA administrative offices and via the airport website at flyavl.com.**

To ensure that the community is effectively informed of and able to participate in public hearings, the Marketing Department may include 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 directions 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, GARAA will be able to identify, understand, and engage with communities. In doing so, GARAA needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by its airport program.

Affected Communities²	Population
<i>Buncombe County</i>	262,724
<i>Henderson County</i>	115,037

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

(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 Communities³.

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,” AVL is collecting information about affected and potentially affected low-income communities. According to the *U.S. Census Report, S1701: Poverty Status in the Past 12 Months*, the overall poverty level for Asheville, North Carolina metropolitan area is approximately 11.5 %. The poverty rate is lower compared with the rest of the state of North Carolina (13.3%) The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
<i>Buncombe County</i>	11.2%
<i>Henderson County</i>	11.4%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

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 follows⁴:

² “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.

³ 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.

⁴ Recommend using demographic groups from the U.S. Census.

Affected Community: Buncombe County
Total Affected Community Population: 262,724

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
American Indian and Alaska Native alone	491	0%
Asian alone	2,995	1%
Black or African American alone	14,182	5%
Hispanic or Latino origin (of any race)	18,690	7%
Native Hawaiian and Other Pacific Islander alone	373	0%
Some other race alone	4,536	2%
Two or more races	15,611	6%
White alone	224,536	85%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

Affected Community: Henderson County
Total Affected Community Population: 115,037

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
American Indian and Alaska Native alone	517	0%
Asian alone	1,506	1%
Black or African American alone	3,781	3%
Hispanic or Latino origin (of any race)	12,080	11%
Native Hawaiian and Other Pacific Islander alone	168	0%
Some other race alone	3,840	3%
Two or more races	5,026	4%
White alone	100,199	87%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that GARAA communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁵ that are spoken in LEP households in the Affected Communities. The data source is the American Community Survey.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.⁶ The safe harbor for our community is 1,000.

⁵ 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.

⁶ 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
<i>Spanish (Buncombe County)</i>	5,439	±606
<i>Spanish (Henderson County)</i>	4,912	±513

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

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)
<i>Spanish</i>		X		

Source: Airport staff

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

Additional Languages Spoken

None

This information is updated annually⁷ through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
<i>U.S. Census Bureau</i>	https://data.census.gov/table/ACSST5Y2022.S1701?q=S1701&g=050XX00US37021,37089

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

- *The airport will include voluntary demographic questions on sign-in-sheets at all community meetings, business outreach meetings and on airport surveys.*

⁷ 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.

Staff and Advisory Board Diversity.

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

Description of Employee and Advisory Board Demographic Information Collection Methods

- *The airport tracks demographic information for its employees, available in the payroll system.*
- *Members of the Airport Authority Board and any planning or advisory boards will be given voluntary disclosure forms for demographic data collection.*

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 GARAA 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.⁸

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
<i>Air Traffic Control Tower</i>	<i>None</i>
<i>North concourse of terminal, north ticketing, north baggage claim</i>	<i>None</i>

Source: Airport staff

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

⁸ 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.

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
<i>South concourse, south ticketing, north baggage claim, lobby, TSA and other public areas of terminal</i>	<i>None</i>
<i>Parking on Airport Road</i>	<i>None</i>
<i>Taxiway A Rehabilitation</i>	<i>None</i>
<i>Westside Apron & Taxiway</i>	<i>None</i>
<i>New Garage Construction</i>	<i>None</i>
<i>Runway/Taxiway Sealcoat</i>	<i>None</i>
<i>Terminal Apron Improvements</i>	<i>None</i>

Source: Airport staff

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?
<i>None</i>		

Source: Airport staff

Justifications:

Facilities or Construction Projects	Justification
<i>None.</i>	

Source: Airport staff

8. Limited English Proficiency (LEP)

Executive Order 13166

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

In Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities:

Language
<i>Spanish</i>

AVL also collects data for languages spoken by airport guests.⁹ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
<i>Assistance requests to airport information desks</i>	<i>N/A</i>

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

Language
<i>None</i>

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 AVL 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
<i>ALTA</i>	<i>Spanish</i>
<i>Interpreters Unlimited</i>	<i>Spanish</i>

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
<i>On-line, phone</i>	<i>Spanish</i>

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>ALTA</i>	<i>Spanish</i>
<i>Interpreters Unlimited</i>	<i>Spanish</i>
<i>Google Translate</i>	<i>Spanish and others if needed</i>

⁹ 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.

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
<i>Airport information desk</i>	<i>All above languages, using Google Translate or third-party interpretation/translation service</i>
<i>On-line, phone</i>	<i>Spanish</i>

Description of Interpretation Assistance Processes

- *The Guest Services information desk is the central hub for assistance, and all airport tenant organizations send customers to the desk for language assistance, if needed. If language translation services are needed, the team is trained to use Google Translate to assist. If more complex service is required, one of the contracted services listed will be contacted via phone or on-line for on-demand assistance.*

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 Asheville Rides Transit (ART) and Apple Country Public Transit (ACPT) 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
Buncombe County	Fixed-route buses	Existing
Buncombe County	Paratransit vans	Existing
Henderson County	Fixed-route buses	Existing
Henderson County	Paratransit vans	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
<i>Airport direct-negotiated contracts for services or via solicitation – all opportunities</i>	<p><i>Methods vary, and can include advertisements in regional media, open houses, social media outreach, partnership with minority business organizations, and advertising with industry member organizations.</i></p> <p><i>Recent examples of opportunities for which we have solicited include requests for qualifications for general engineering services, and requests for proposals for contractor services for the terminal modernization project.</i></p>

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 **Planning Department and/or Business Development Department as appropriate.**

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 requirements¹⁰
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹¹

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, AVL 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 matters¹²
3. Allege misconduct by the GARAA, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the GARAA including airport employees, contractors, concessionaires, lessees, or tenants.

¹⁰ 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.

¹¹ 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.

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

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with GARA¹³. Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to the Human Resources Department and the President/CEO.

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

Tina Kinsey
Vice President Marketing, Public Relations + Air Service Development/Title VI Coordinator
61 Terminal Drive, Suite 1
Fletcher, NC 27832
828-684-2226
tkinsey@flyavl.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.

Discrimination Complaint Referral Procedure

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within **7 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 will upload the information into the FAA Civil Rights Connect System. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

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

Cooperation with FAA. The Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against GARAA, 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 *alternate dispute resolution, negotiation, and/or mediation*.

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 GARAA's conclusion regarding whether unlawful discrimination occurred, and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

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

- The complainant may appeal in writing to the Airport's CEO.
- 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 CEO 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, GARAA will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. GARAA 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 the Title VI Coordinator.

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

Website, In-person, and Other Distribution Methods

1 www.flyavl.com, *Title VI page*

14. Population/Language Data

Language Data B16001

B16001 Table	Buncombe County, North Carolina	
Label	Estimate	Margin of Error
Total:	234,237	±5
Speak only English	216,269	±1,161
Spanish or Spanish Creole:	10,984	±747
Speak English "very well"	5,545	±639
Speak English less than "very well"	5,439	±606
French (incl. Patois, Cajun):	829	±397
Speak English "very well"	632	±305
Speak English less than "very well"	197	±220
French Creole:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Italian:	168	±124
Speak English "very well"	159	±123
Speak English less than "very well"	9	±14
Portuguese or Portuguese Creole:	147	±148
Speak English "very well"	56	±38
Speak English less than "very well"	91	±141
German:	558	±201
Speak English "very well"	524	±195
Speak English less than "very well"	34	±29
Yiddish:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other West Germanic languages:	144	±73
Speak English "very well"	130	±68
Speak English less than "very well"	14	±23
Scandinavian languages:	124	±101

Speak English "very well"	124	±101
Speak English less than "very well"	0	±28
Greek:	151	±117
Speak English "very well"	148	±117
Speak English less than "very well"	3	±4
Russian:	974	±428
Speak English "very well"	468	±266
Speak English less than "very well"	506	±290
Polish:	91	±78
Speak English "very well"	50	±46
Speak English less than "very well"	41	±63
Serbo-Croatian:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Slavic languages:	825	±368
Speak English "very well"	331	±189
Speak English less than "very well"	494	±246
Armenian:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Persian:	5	±7
Speak English "very well"	5	±7
Speak English less than "very well"	0	±28
Gujarati:	159	±166
Speak English "very well"	104	±116
Speak English less than "very well"	55	±63
Hindi:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Urdu:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Indic languages:	45	±50
Speak English "very well"	45	±50

Speak English less than "very well"	0	±28
Other Indo-European languages:	538	±232
Speak English "very well"	325	±187
Speak English less than "very well"	213	±143
Chinese:	752	±349
Speak English "very well"	137	±117
Speak English less than "very well"	615	±348
Japanese:	79	±55
Speak English "very well"	15	±17
Speak English less than "very well"	64	±53
Korean:	233	±193
Speak English "very well"	94	±97
Speak English less than "very well"	139	±117
Mon-Khmer, Cambodian:	30	±49
Speak English "very well"	15	±24
Speak English less than "very well"	15	±25
Hmong:	17	±25
Speak English "very well"	12	±23
Speak English less than "very well"	5	±10
Thai:	62	±51
Speak English "very well"	62	±51
Speak English less than "very well"	0	±28
Laotian:	56	±69
Speak English "very well"	47	±56
Speak English less than "very well"	9	±15
Vietnamese:	42	±55
Speak English "very well"	10	±18
Speak English less than "very well"	32	±52
Other Asian languages:	121	±84
Speak English "very well"	116	±81
Speak English less than "very well"	5	±11
Tagalog:	415	±258
Speak English "very well"	283	±210

Speak English less than "very well"	132	±117
Other Pacific Island languages:	82	±70
Speak English "very well"	77	±66
Speak English less than "very well"	5	±19
Navajo:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Native North American languages:	20	±23
Speak English "very well"	15	±20
Speak English less than "very well"	5	±11
Hungarian:	77	±89
Speak English "very well"	8	±11
Speak English less than "very well"	69	±89
Arabic:	66	±60
Speak English "very well"	46	±50
Speak English less than "very well"	20	±25
Hebrew:	24	±49
Speak English "very well"	19	±35
Speak English less than "very well"	5	±14
African languages:	84	±112
Speak English "very well"	40	±42
Speak English less than "very well"	44	±74
Other and unspecified languages:	66	±69
Speak English "very well"	49	±63
Speak English less than "very well"	17	±28
Speak English less than "very well"	15	±25

B16001 Table	Henderson County,	
Label	Estimate	Margin of Error
Total:	104,194	±66
Speak only English	93,743	±771
Spanish or Spanish Creole:	8,532	±723
Speak English "very well"	3,620	±621
Speak English less than "very well"	4,912	±513
French (incl. Patois, Cajun):	184	±85
Speak English "very well"	123	±62
Speak English less than "very well"	61	±45
French Creole:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Italian:	32	±27
Speak English "very well"	32	±27
Speak English less than "very well"	0	±28
Portuguese or Portuguese Creole:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
German:	302	±111
Speak English "very well"	203	±71
Speak English less than "very well"	99	±82
Yiddish:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other West Germanic languages:	22	±25
Speak English "very well"	22	±25
Speak English less than "very well"	0	±28
Scandinavian languages:	10	±15
Speak English "very well"	10	±15
Speak English less than "very well"	0	±28
Greek:	47	±47
Speak English "very well"	36	±43

Speak English less than "very well"	11	±17
Russian:	9	±15
Speak English "very well"	0	±28
Speak English less than "very well"	9	±15
Polish:	33	±36
Speak English "very well"	25	±34
Speak English less than "very well"	8	±12
Serbo-Croatian:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Slavic languages:	44	±49
Speak English "very well"	26	±26
Speak English less than "very well"	18	±28
Armenian:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Persian:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Gujarati:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Hindi:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Urdu:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Indic languages:	39	±58
Speak English "very well"	39	±58
Speak English less than "very well"	0	±28
Other Indo-European languages:	44	±52
Speak English "very well"	44	±52

Speak English less than "very well"	0	±28
Chinese:	83	±61
Speak English "very well"	52	±37
Speak English less than "very well"	31	±35
Japanese:	40	±42
Speak English "very well"	34	±36
Speak English less than "very well"	6	±11
Korean:	166	±171
Speak English "very well"	142	±141
Speak English less than "very well"	24	±36
Mon-Khmer, Cambodian:	30	±46
Speak English "very well"	0	±28
Speak English less than "very well"	30	±46
Hmong:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Thai:	20	±27
Speak English "very well"	0	±28
Speak English less than "very well"	20	±27
Laotian:	61	±96
Speak English "very well"	32	±50
Speak English less than "very well"	29	±47
Vietnamese:	96	±96
Speak English "very well"	10	±17
Speak English less than "very well"	86	±96
Other Asian languages:	69	±66
Speak English "very well"	29	±37
Speak English less than "very well"	40	±59
Tagalog:	235	±93
Speak English "very well"	169	±96
Speak English less than "very well"	66	±64
Other Pacific Island languages:	69	±96
Speak English "very well"	52	±72

Speak English less than "very well"	17	±25
Navajo:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Native North American languages:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Hungarian:	160	±185
Speak English "very well"	135	±169
Speak English less than "very well"	25	±40
Arabic:	9	±14
Speak English "very well"	9	±14
Speak English less than "very well"	0	±28
Hebrew:	9	±15
Speak English "very well"	9	±15
Speak English less than "very well"	0	±28
African languages:	16	±25
Speak English "very well"	16	±25
Speak English less than "very well"	0	±28
Other and unspecified languages:	90	±92
Speak English "very well"	90	±92
Speak English less than "very well"	0	±28

B16001 | LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Population Data S1701

	Buncombe County, North Carolina					
	Total		Below Poverty Level		Percent below Poverty	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	262,724	±340	29,543	±2,003	11.2%	±0.8
AGE						
Under 18 years	47,551	±311	6,857	±958	14.4%	±2.0
Under 5 years	11,910	±257	1,571	±308	13.2%	±2.6
5 to 17 years	35,641	±162	5,286	±819	14.8%	±2.3
Related children of householder under 18 years	47,277	±364	6,583	±952	13.9%	±2.0
18 to 64 years	161,790	±168	17,636	±1,459	10.9%	±0.9
18 to 34 years	55,271	±199	7,956	±945	14.4%	±1.7
35 to 64 years	106,519	±226	9,680	±1,037	9.1%	±1.0
60 years and over	71,452	±1,166	6,859	±736	9.6%	±1.0
65 years and over	53,383	±97	5,050	±636	9.5%	±1.2
SEX						
Male	126,975	±345	13,970	±1,274	11.0%	±1.0
Female	135,749	±401	15,573	±1,079	11.5%	±0.8
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	224,536	±1,242	21,478	±1,778	9.6%	±0.8
Black or African American alone	14,182	±722	3,363	±829	23.7%	±5.7

American Indian and Alaska Native alone	491	±236	129	±186	26.3%	±28.4
Asian alone	2,995	±342	288	±146	9.6%	±4.5
Native Hawaiian and Other Pacific Islander alone	373	±70	49	±95	13.1%	±27.6
Some other race alone	4,536	±983	865	±426	19.1%	±7.8
Two or more races	15,611	±1,502	3,371	±1,003	21.6%	±5.6
Hispanic or Latino origin (of any race)	18,690	±155	4,871	±1,133	26.1%	±6.0
White alone, not Hispanic or Latino	217,451	±613	19,631	±1,615	9.0%	±0.7
EDUCATIONAL ATTAINMENT						
Population 25 years and over	196,581	±221	19,309	±1,350	9.8%	±0.7
Less than high school graduate	15,187	±1,434	4,604	±609	30.3%	±3.7
High school graduate (includes equivalency)	44,936	±2,171	6,872	±851	15.3%	±1.8
Some college, associate's degree	50,955	±1,866	3,899	±492	7.7%	±0.9
Bachelor's degree or higher	85,503	±2,453	3,934	±641	4.6%	±0.7
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	135,684	±2,154	8,441	±881	6.2%	±0.7
Employed	130,869	±2,405	7,403	±806	5.7%	±0.6
Male	67,080	±1,675	3,485	±522	5.2%	±0.8
Female	63,789	±1,452	3,918	±582	6.1%	±0.9
Unemployed	4,815	±673	1,038	±318	21.6%	±6.2
Male	3,140	±576	678	±267	21.6%	±7.7
Female	1,675	±345	360	±153	21.5%	±8.0

WORK EXPERIENCE						
Population 16 years and over	220,710	±380	23,413	±1,625	10.6%	±0.7
Worked full-time, year-round in the past 12 months	91,850	±2,240	2,226	±458	2.4%	±0.5
Worked part-time or part-year in the past 12 months	49,491	±1,797	7,032	±914	14.2%	±1.8
Did not work	79,369	±2,202	14,155	±1,126	17.8%	±1.2
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	10,773	±1,433	(X)	(X)	(X)	(X)
125 percent of poverty level	41,587	±2,881	(X)	(X)	(X)	(X)
150 percent of poverty level	55,807	±2,996	(X)	(X)	(X)	(X)
185 percent of poverty level	72,669	±3,368	(X)	(X)	(X)	(X)
200 percent of poverty level	78,968	±3,848	(X)	(X)	(X)	(X)
300 percent of poverty level	127,832	±4,660	(X)	(X)	(X)	(X)
400 percent of poverty level	166,231	±4,367	(X)	(X)	(X)	(X)
500 percent of poverty level	192,584	±3,729	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	66,666	±2,794	14,912	±1,190	22.4%	±1.6
Male	31,753	±1,998	7,506	±857	23.6%	±2.3
Female	34,913	±1,448	7,406	±747	21.2%	±2.0
15 years	49	±48	49	±48	100.0%	±48.4

16 to 17 years	225	±125	225	±125	100.0%	±17.1
18 to 24 years	5,328	±661	2,607	±500	48.9%	±6.4
25 to 34 years	15,486	±1,079	2,589	±437	16.7%	±2.9
35 to 44 years	9,563	±1,196	2,076	±525	21.7%	±4.5
45 to 54 years	8,467	±879	1,583	±351	18.7%	±3.9
55 to 64 years	9,455	±1,045	2,101	±538	22.2%	±4.4
65 to 74 years	10,014	±832	1,986	±406	19.8%	±3.8
75 years and over	8,079	±639	1,696	±411	21.0%	±4.4
Mean income deficit for unrelated individuals (dollars)	6,923	±423	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	28,659	±1,910	1,083	±339	3.8%	±1.2
Worked less than full-time, year-round in the past 12 months	13,988	±916	4,611	±586	33.0%	±3.8
Did not work	24,019	±1,459	9,218	±936	38.4%	±2.9
Population in housing units for whom poverty status is determined	261,547	±332	28,737	±1,979	11.0%	±0.8

Henderson County, North Carolina					
Total		Below Poverty Level		Percent below poverty level	
Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
115,037	±229	13,087	±1,490	11.4%	±1.3
21,334	±231	3,832	±700	18.0%	±3.3
5,248	±124	1,053	±297	20.1%	±5.8
16,086	±210	2,779	±562	17.3%	±3.5
21,173	±300	3,678	±698	17.4%	±3.3
64,133	±145	7,191	±842	11.2%	±1.3
19,540	±143	2,607	±569	13.3%	±2.9
44,593	±177	4,584	±544	10.3%	±1.2

37,856	±684	2,779	±401	7.3%	±1.1
29,570	±143	2,064	±359	7.0%	±1.2
55,608	±277	5,663	±752	10.2%	±1.4
59,429	±222	7,424	±918	12.5%	±1.5
100,199	±877	9,416	±1,225	9.4%	±1.2
3,781	±413	394	±210	10.4%	±5.3
517	±199	79	±84	15.3%	±16.3
1,506	±172	126	±149	8.4%	±9.9
168	±181	36	±37	21.4%	±5.4
3,840	±838	1,114	±530	29.0%	±11.9
5,026	±806	1,922	±658	38.2%	±9.0
12,080	±191	3,391	±829	28.1%	±6.9
94,744	±366	8,427	±1,070	8.9%	±1.1
86,104	±151	8,102	±844	9.4%	±1.0
7,150	±708	1,473	±344	20.6%	±4.8
21,486	±1,291	2,958	±519	13.8%	±2.2
27,921	±1,288	2,100	±320	7.5%	±1.2
29,547	±1,175	1,571	±310	5.3%	±1.0
56,534	±1,063	4,402	±685	7.8%	±1.2
54,540	±1,036	3,847	±637	7.1%	±1.2
28,343	±761	1,748	±345	6.2%	±1.2
26,197	±779	2,099	±483	8.0%	±1.8
1,994	±449	555	±241	27.8%	±10.4
1,180	±354	401	±212	34.0%	±14.5
814	±250	154	±101	18.9%	±11.5
96,450	±229	9,757	±1,016	10.1%	±1.0

37,308	±1,002	1,256	±358	3.4%	±1.0
21,869	±1,189	3,076	±623	14.1%	±2.6
37,273	±1,042	5,425	±666	14.6%	±1.7
6,142	±1,098	(X)	(X)	(X)	(X)
17,051	±1,644	(X)	(X)	(X)	(X)
22,664	±1,770	(X)	(X)	(X)	(X)
30,149	±1,977	(X)	(X)	(X)	(X)
33,507	±1,893	(X)	(X)	(X)	(X)
54,359	±1,874	(X)	(X)	(X)	(X)
72,470	±1,887	(X)	(X)	(X)	(X)
84,431	±1,707	(X)	(X)	(X)	(X)
21,392	±1,160	4,566	±556	21.3%	±2.4
10,309	±798	2,144	±398	20.8%	±3.5
11,083	±730	2,422	±406	21.9%	±3.5
102	±119	102	±119	100.0%	±32.7
59	±86	52	±83	88.1%	±39.9
1,447	±452	600	±259	41.5%	±11.9
2,454	±446	605	±212	24.7%	±8.2
2,508	±497	266	±117	10.6%	±4.5
2,836	±376	895	±264	31.6%	±8.6
3,713	±374	771	±177	20.8%	±4.6
4,266	±437	593	±190	13.9%	±4.1
4,007	±413	682	±169	17.0%	±3.9
7,647	±654	(X)	(X)	(X)	(X)
7,440	±807	295	±127	4.0%	±1.8
4,573	±611	1,631	±434	35.7%	±8.3
9,379	±580	2,640	±331	28.1%	±3.4
114,750	±231	12,886	±1,481	11.2%	±1.3

15. Completed Unlawful Discrimination Poster

Unlawful Discrimination

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

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

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

Coordinator: Tina Kinsey, VP of Public Relations/Title VI Coord
Phone: 828-684-2226
Address: 61 Terminal Drive, Suite 1, Fletcher, NC 28732

Discriminacion Illegal

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: Tina Kinsey, VP of Public Relations/Title VI Coord
Teléfono: 828-684-2226
Dirección: 61 Terminal Drive, Suite 1, Fletcher, NC 28732



U.S. Department of Transportation
Federal Aviation Administration

HQ-10/068