

# Sample Airport Sponsor Community Participation Plan (CPP)<sup>1</sup>

## 1. Administration

The purpose of this CPP is to ensure that stakeholders or communities affected<sup>2</sup> by **the Reno-Tahoe Airport Authority (RTAA)** projects or operations can be informed and participate and have their input thoughtfully considered in the key stages during airport planning efforts, regardless of their race, color, national origin, sex, sexual orientation, gender identity, creed, age, or disability (hereafter, the “protected bases”). This plan is provided in accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and related authorities.<sup>3</sup> This plan and associated reports regarding our CPP efforts will be communicated to the public in formats accessible to persons with disabilities and to limited English proficient (LEP) individuals.

The individuals primarily responsible for implementing the **RTAA** CPP are:

Responsible Official	Title, Office, and Responsibilities
1. Natalie Brown	Chief Marketing & Public Affairs Officer – Oversees Communications and Outreach
2. Tom Luria	Associate General Counsel/Title VI Coordinator – Coordinates Title VI program and collects demographic data for CPP

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

Website, In-person, and Other Communication Methods
1. RTAA Website: <a href="http://www.renoairport.com">www.renoairport.com</a>
2. In Person: Available at ADA Accessible Front Desk of RTAA Administrative Offices pre-security at the RNO main terminal

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

---

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

<sup>2</sup> Within this CPP, the term “affected” also means *served*, in addition to *positively or negatively impacted*.

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

**RTAA** also makes this CPP available through the following methods when engaging members of the public concerning planning efforts:

<b>Website, In-person, and Other Distribution Methods</b>
1. Website: <a href="http://www.renoairport.com">www.renoairport.com</a>
2. In Person: Available at Front Desk of RTAA Administrative Offices

## **2. Goals and Objectives**

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

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

<b>Planning Processes</b>
1. Next Gen B&C (Concourse Redevelopment)
2. GTC Project (Consolidated Rental Car Facility and Ground Transportation Center)
3. Ticket Hall Expansion
4. The Loop (RNO Loop Road redevelopment)
5. New HQ

**RTAA** seeks public input for the above processes through the following methods:

<b>Public Input Methods</b>	<b>Planning Process(es) that use each Method</b>
A. Public Comment at Public Meetings including the RTAA Board of Trustees (generally monthly) per Nevada Revised Statutes 241	#1, 2, 3, 4 & 5
B. Community Roadshow Events (generally quarterly)	#1, 2, 3, 4 & 5
C. City Councils and County Commission presentations	#1, 2, 3, 4 & 5
D. Feedback via website	#1, 2, 3, 4 & 5
E. RNO Airfield Users Group	#1
F. Meetings with specific business interests like the Chamber of Commerce and economic development authorities	#1, 2, 3, 4 & 5

### **3. Identification of and Focused Outreach to Affected Communities**

See Community Statistics section of **RTAA**'s Title VI Plan, for detailed discussion of Affected Communities.

The specific steps **RTAA** will take to communicate with, inform, educate, consult or solicit input from, and expand opportunities for engagement with each Affected Community,<sup>4</sup> are provided below.

<b>Affected Community</b>	<b>Key Community Reps. (CBOs, leaders, etc.)</b>	<b>Focused Outreach Steps</b>
Reno Southeast CCD/Sparks CCD	Reno Sparks Chamber of Commerce , Nevada Military Support Alliance, Vistage, Economic Development Authority of Western Nevada, Northern Nevada Development Authority, Nevada Women's Fund Pathways to Aviation, Artown, Reno-Arts Consortium; Reno City Council, Sparks City Council, Washoe County Commission	<ul style="list-style-type: none"> <li>a. Present information at meetings</li> <li>b. Attend or sponsor community events</li> <li>c. Engagement with members and leaders</li> </ul>

### **4. Effective Communication**

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

---

<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.

## **5. Communication Platforms**

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

<b>Social Media, Monitors, and Other Communication Platforms</b>
1. Social media platforms including Facebook, Instagram, X, LinkedIn, etc.
2. Signage at RNO including Flight Information Display Systems (FIDS)
3. <a href="http://www.renoairport.com">www.renoairport.com</a>

## **6. Records**

This section includes the procedures **RTAA** will follow to document of our outreach efforts. Records for steps taken to provide outreach to Affected Communities will be maintained in the following locations:

<b>Website, In-person, and Other Storage Methods</b>
1. Digital Records on RTAA Computer System

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

<b>Website, In-person, and Other Storage Methods</b>
1. Digital Records on RTAA Computer System

Records for demographics of participants will also be kept. Requested demographic information will include race, national origin, sexual orientation, gender identity, creed, age, disability, languages spoken, and community membership.<sup>5</sup> Demographic information will be requested by the following methods:

<b>Demographic Information Collection Methods</b>
1. Voluntary Disclosure in Customer Satisfaction Surveys
2. Voluntary Disclosure During Bidding and Outreach Processes

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

---

<sup>5</sup> This information is solicited to demonstrate compliance with Title VI and related requirements. See 49 CFR § 21.9(b); 49 U.S.C. § 47123; 28 CFR § 42.406; and FAA Order 1400.11.

## 7. Reporting Outcomes

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

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

The CPP Reports will be included with RTAA's Title VI Plan.

### **Appendix 1** **Complete only if required by Section 3**

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

Affected Communities <sup>6</sup>	Population
<i>Reno Southeast CCD</i>	83,655
<i>Sparks CCD</i>	61,735

(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<sup>7</sup>.

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,” RTAA is collecting information about affected and potentially affected low-income communities. According to **U.S. Census Report S1701: Poverty Status in the Past 12 Months**, the overall poverty level for the Washoe

---

<sup>6</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.

<sup>7</sup> 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.

County is approximately **11.2 %**. The poverty rate remains **similar** compared with the rest of the **of the State of Nevada**. The poverty rates for the specific Affected Communities are as follows:

<b>Affected Communities</b>	<b>Poverty Rate</b>
<i>Reno Southeast CCD</i>	<i>12.0%</i>
<i>Sparks CCD</i>	<i>10.7%</i>

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>8</sup>:

<b>Affected Community: Reno Southeast CCD</b>		
<b>Total Affected Community Population: 83,655</b>		
<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
<i>White</i>	<i>47,029</i>	<i>56%</i>
<i>Black or African American</i>	<i>1,898</i>	<i>2%</i>
<i>American Indian or Alaska Native</i>	<i>881</i>	<i>1%</i>
<i>Asian</i>	<i>6,269</i>	<i>7%</i>
<i>Native Hawaiian or Other Pacific Islander</i>	<i>965</i>	<i>1%</i>
<i>Hispanic or Latino</i>	<i>23,181</i>	<i>28%</i>
<i>More than one</i>	<i>3,256</i>	<i>4%</i>
<i>Some Other Race</i>	<i>176</i>	<i>&gt;1%</i>

<b>Affected Community: Sparks CCD</b>		
<b>Total Affected Community Population: 61,735</b>		
<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
<i>White</i>	<i>32,816</i>	<i>53%</i>
<i>Black or African American</i>	<i>1,941</i>	<i>3%</i>
<i>American Indian or Alaska Native</i>	<i>1,130</i>	<i>2%</i>
<i>Asian</i>	<i>3,760</i>	<i>6%</i>
<i>Native Hawaiian or Other Pacific Islander</i>	<i>768</i>	<i>1%</i>
<i>Hispanic or Latino</i>	<i>22,905</i>	<i>37%</i>
<i>More than one</i>	<i>9,148</i>	<i>15%</i>
<i>Some Other Race</i>	<i>12,172</i>	<i>20%</i>

<sup>8</sup> Recommend using demographic groups from the U.S. Census.

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that **RTAA** communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>9</sup> that are spoken in LEP households in the Affected Communities. The data source is **American Community Survey**.

The threshold we have used for identifying the languages with significant LEP populations is the DOT safe harbor threshold, which is 5% or 1,000, whichever is less.<sup>10</sup> The safe harbor for our community is **1,000**. Please refer to the end of this document to find data for all languages in our community.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
<i>Spanish</i>	13,442	+/-1,558

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

Additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, and others, include: **None**.

This information is updated annually<sup>11</sup> through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
<i>U.S. Census Bureau</i>	<a href="https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001">https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001</a>

<sup>9</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>10</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.

<sup>11</sup> Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan’s 3-year period.

Beneficiary Diversity.

Demographic information is collected from airport customers, attendees at community meetings, and businesses seeking opportunities at the airport, through voluntary disclosures.

<b>Description of Beneficiary Demographic Information Collection Methods</b>
<ul style="list-style-type: none"><li>• <i>The RTAA conducts occasional 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.</i></li><li>• <i>RTAA asks for voluntary disclosure of demographic information during bidding and outreach processes</i></li></ul>

Staff and Advisory Board Diversity.

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

<b>Description of Employee and Advisory Board Demographic Information Collection Methods</b>
<ul style="list-style-type: none"><li>• <i>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.</i></li><li>• <i>When new board members are appointed, RTAA solicits demographic information from the new board members by asking them to voluntarily provide demographic information.</i></li></ul>

**Appendix 2**  
**Complete only if required by Section 4**

In creating a Language Assistance Plan, the **RTAA** 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>
<i>Spanish</i>



**RTAA** also collects data for languages spoken by airport guests.<sup>12</sup> Data sources include:

<b>Data Sources for Languages Spoken by Airport Guests</b>	<b>Website link to Data Source</b>
<i>Airline-provided data</i>	<i>N/A</i>
<i>Assumption from flight origin / destination</i>	<i>N/A</i>
<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: **none**.

The RTAA 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 **RTAA** 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: **none**.
- Information regarding translation services can be obtained at:

<b>Location for Translation Assistance</b>	<b>Languages</b>
<i>Administration Offices Front Desk</i>	<i>All Languages</i>
<i>Airport website translate view</i>	<i>Spanish</i>
<i>Multi-lingual staff pool</i>	<i>Spanish, Tagalog, Hindi, Punjabi, Urdu</i>

**Interpretation Services:**

- The following vendors have been identified for interpretation services: **None**.
- Information regarding interpretation services can be obtained at: the RTAA Administrative Offices Front Desk.

<b>Location for Interpretation Assistance</b>	<b>Languages</b>
<i>Administration Offices Front Desk</i>	<i>All languages</i>

---

<sup>12</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.

### **Description of Interpretation Assistance Processes**

- *RTAA staff have access to an ISpeak card with a variety of commonly encountered languages and are trained to use the card as a translation starting point.*
- *RTAA People Operations maintains a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient to provide interpretation and/or translation services. The list is updated occasionally is available to all airport employees through the internal website. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation, during normal business hours.*
- *RTAA staff are innovative and versatile, and help members of the travelling public and others that request language assistance through the use of free translation websites and applications, personal connections (i.e. friends and family), and other means that they find to ensure translation assistance is provided.*
- *For written translations, RTAA would first attempt to utilize bilingual staff. If the RTAA does not have a bilingual employee for the language or the document is too complex, the RTAA will hire a professional translator on an ad hoc basis to translate the document.*

*Detailed information is available in the Language Assistance plan.*