

# Ogdensburg International Airport (OGS) Title VI Plan

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

**Ogdensburg Bridge and Port Authority (OBPA)** 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.

**Ogdensburg Bridge and Port Authority** further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not. It agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. Any time communities may be impacted by programs or activities the commission will take action to involve them and the public in the decision-making process.

**Ogdensburg Bridge and Port Authority** requires nondiscrimination assurances, as prescribed by FAA, from each tenant, contractor, and concessionaire providing an activity, service, or facility at the airport. Assurances must be included in any related lease, contract, or franchise agreement between the commission and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

**Steve Lawrence, Executive Director**, who can be reached at **315-393-4080 Ext. 226** or **slawrence@ogdensport.com**, is responsible for overseeing compliance with Title VI and is 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*

**Steve Lawrence**

**Executive Director**

**(315) 393-4080 Ext.226**

August 1, 2024

**Effective Date**

August 1, 2027

**3-Year Expiration Date**

<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

**Steve Lawrence, Executive Director and Charlie Garrelts, Airport Manager** have reviewed and adopted this Title VI Plan for the Ogdensburg International Airport. This plan will be updated no less than once every three (3) years. Significant revisions to policies or federal guidelines may warrant re-adoption by Ogdensburg Bridge and Port Authority and resubmittal to FAA.

<b>Supporting Title VI Program</b>	<b>Airport Sponsor Program / Office</b>
<i>Steve Lawrence</i>	<i>Airport Commission Chair</i>
<i>Anthony Adamczyk</i>	<i>Director of Economic Development</i>
<i>Charlie Garrelts</i>	<i>Airport Manager</i>

As of **7/15/2024**, **Ogdensburg Bridge and Port Authority** has no pending applications for Federal financial assistance. **The Capital Investment Plan (CIP) is attached as Appendix: Figure 1.**

<b>Federal Source</b>	<b>Grant Number</b>	<b>Amount</b>
<b>2021:</b>		
<i>ARPA CRRSAA – Concession Relief</i>	<i>3-36-0089-062-2021</i>	<i>\$1,132,685</i>
<i>American Rescue Plan (ARPA)</i>		
<i>FAA Drainage Improvement Design</i>	<i>3-36-0089-060-2021</i>	<i>\$195,000</i>
<i>FAA Conduct Pavement Management Plan</i>	<i>3-36-0089-058-2021</i>	<i>\$79,000</i>
<i>FAA Acquire AFFF Testing Equipment</i>	<i>3-36-0089-061-2021</i>	<i>\$35,521</i>
<b>2022:</b>		
<i>FAA Snow Removal Equipment Building Design</i>	<i>3-36-0089-063-2022</i>	<i>\$423,700</i>
<i>FAA Drainage Improvement Construction</i>	<i>3-36-0089-064-2022</i>	<i>\$2,380,685</i>
<b>2023:</b>		
<i>None</i>		
<b>2024: (anticipated)</b>		
<i>FAA and NYSDOT funded Terminal Construction</i>	<i>3-36-0089-065-2024</i>	<i>\$475,000*</i>

\*The \$475k grant has been issued and is mostly spent. An application for 5/20 an application for \$2.0 million AIP for terminal construction was submitted, but not yet awarded. As of 6/28 an application for \$2,565,051 BIL-AIG was submitted, but not yet awarded.

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

<b>Federal Source</b>	<b>Grant Award Information Available at:</b>
<i>FAA AIP</i>	<i><a href="https://www.faa.gov/airports/aip/">https://www.faa.gov/airports/aip/</a></i>

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

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

**Ogdensburg Bridge and Port Authority** will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See

[https://www.faa.gov/airports/aip/grant\\_assurances/#current-assurances](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. **Ogdensburg Bridge and Port Authority** requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. St. Lawrence County will utilize current assurances and contract provisions as needed in the links above provided by FAA. There are no sub-recipient agreements, and St. Lawrence County will apply the following to any sub-contractor agreements:

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

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*Subcontract terms will be applied as applicable based on grant and procurement requirements.*

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### **4. Title VI Coordinator Responsibilities**

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

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

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

Among other responsibilities, the Coordinator:

- Proactively ensuring that **Ogdensburg International Airport** is in compliance with nondiscrimination requirements of Title VI and reports on the status of Title VI compliances
- Responding 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

- Receiving 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
- Providing 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 reviewing the airport's Title VI plan and disseminates information throughout staff and the Airport Sponsor's leadership
- Coordinating 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)
- Maintaining demographic data for members of appointed planning and advisory bodies for the airport. Identifying any disparities compared to the community. Providing information to the membership selecting official/committee, particularly when vacancies occur
- Maintaining 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)

**Ogdensburg Bridge and Port Authority** will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. St. Lawrence County 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.

**Ogdensburg Bridge and Port Authority** has posted the above Title VI policy statement at its staff offices.

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

**Ogdensburg Bridge and Port Authority** will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by August 1, 2024, by email or hard copy.

Posters are displayed in the 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>
<i>Terminal</i>	2	2	2
<i>Kiosk</i>	1		

Outreach to Affected Communities

**Ogdensburg Bridge and Port Authority** ensures that notices for public meetings reach all segments of the impacted community identify the effective media platforms to share announcement and notices. Announcements are made in social media, general circulation newspapers, community newspapers, and email broadcast. The commission 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 Communities.

Detailed information on our public notice and outreach procedures is available in the **Ogdensburg Bridge and Port Authority Community Participation Plan (CPP)**. A copy of the CPP will be available at [Ogdensburg International Airport's Website](#).

To ensure that the community is effectively informed of and able to participate in public hearings, **Ogdensburg Bridge and Port Authority** 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. 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 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, **Ogdensburg Bridge and Port Authority** will be able to identify, understand, and engage with communities. In doing so, St. Lawrence County needs to know about communities eligible to be served, actually or potentially affected,

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<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.

benefited or burdened by the airport program.

Communities immediately surrounding the airport or in the flight path:

Affected Communities <sup>4</sup>	Population
<i>Ogdensburg</i>	9,304
<i>Morristown</i>	2,082
<i>Claverack-Red Mills</i>	6,058
<i>Lisbon</i>	4,221
<i>Heuvelton</i>	722
<i>Oswegatchie</i>	4,125

*\*Galilee population rate unavailable, part of Town of Oswegatchie*

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

The following have been identified regarding the Affected Communities:

Low Income Communities<sup>5</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,” **Ogdensburg Bridge and Port Authority** is collecting information about affected and potentially affected low-income communities. According to [U.S. Census Bureau Data](#), the overall poverty level for **St. Lawrence County, NY** that includes all of the above Affected Communities is approximately **17.5%**. Comparatively, the poverty rate for the **State of New York is 14.3%**. The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
<i>St. Lawrence County</i>	18.3%
<i>City of Ogdensburg</i>	18.5%
<i>Morristown</i>	21.6%
<i>Claverack-Red Mills</i>	0%
<i>Lisbon</i>	7.3%
<i>Heuvelton</i>	8.5%
<i>Oswegatchie*</i>	13.1%

*\*Specific Community Poverty Rates Unavailable*

<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.

<sup>5</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 the Community Participation Plan (CPP) to help ensure the meaningful involvement of low-income communities in airport programs and activities.

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>6</sup>:

The table below was generated with [Census Survey Data](#), also attached in Section 14 Population/Language Data, for St. Lawrence County, New York which includes all Affected Communities, as not all isolated data was available:

**Affected Community: St. Lawrence County, NY**  
**Total Affected Community Population: 106,940**

<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>100,523</i>	<i>94%</i>
<i>Black or African American</i>	<i>2,245</i>	<i>2.1%</i>
<i>American Indian or Alaska Native</i>	<i>1,176</i>	<i>1.1%</i>
<i>Asian</i>	<i>1,283</i>	<i>1.2%</i>
<i>Native Hawaiian or Other Pacific Islander</i>	<i>1,069</i>	<i>0.1%</i>
<i>Two or More Races</i>	<i>1,604</i>	<i>1.5%</i>
<i>Hispanic or Latino origin</i>	<i>2,566</i>	<i>2.4%</i>

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that **Ogdensburg Bridge and Port Authority** communicates effectively with LEP individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>7</sup> that are spoken in LEP households in the Affected Communities. The data source is the [EPA Environmental Justice Screen](#) tool.

The threshold used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is defined as 5% or 1,000, whichever is less.<sup>8</sup>

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<sup>6</sup> Recommend using demographic groups from the U.S. Census.

<sup>7</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>8</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.

<b>Languages Spoken by LEP Population that Surpass the Safe Harbor Threshold</b>	<b>Number</b>	<b>Margin of Error</b>
<i>Spanish or Spanish Creole</i>	1,969	±255
<i>French (incl. Patois, Cajun)</i>	1,146	±248
<i>Other West Germanic languages</i>	1,577	±653

*See Census table B16001 attached at the end of the plan for reference.*

Frequency of contact with LEP individuals at the airport and airport-related activities:

<b>Languages Frequently Spoken by LEP Persons Under the Safe Harbor Threshold</b>	<b>A few times a year (12 or less days a year)</b>	<b>Several times a month (13 to 51 days a year)</b>	<b>At least once a week (52 to 364 days a year)</b>	<b>Every day (365 days a year)</b>
<i>Spanish or Spanish Creole</i>	x			
<i>French (incl. Patois, Cajun)</i>	x			
<i>Other West Germanic languages</i>	x			

This information is updated annually<sup>9</sup> through checking the following resources:

<b>Data Sources for Languages Spoken in Affected Community</b>	<b>Website link to Data Source</b>
<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>
<i>EPA Environmental Justice Data</i>	<a href="https://www.epa.gov/ejscreen/download-ejscreen-data">https://www.epa.gov/ejscreen/download-ejscreen-data</a>
<i>LEP Website</i>	<a href="https://www.lep.gov">https://www.lep.gov</a>

### 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**

*Environmental justice community data is further discussed in the Four Factor Analysis.*

### Staff and Advisory Board Diversity.

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

<sup>9</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.



**Description of Employee and Advisory Board Demographic Information Collection Methods**

- *Ogdensburg Bridge and Port Authority employees may voluntarily disclose demographic information.*

**7. Potential or Known Community Impacts**

Projects or services receiving federal financial assistance have the potential to affect so many aspects of American life. Thus, in general, no Ogdensburg Bridge and Port Authority activity is to 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>10</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>
<i>Airport Drainage Improvements (FAA funded)</i>	<i>None</i>
<i>Terminal Expansion and Renovation (blended FAA and NYSDOT funded)</i>	<i>None</i>

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

<b>Airport Facility Construction Projects</b>	<b>Affected Community Impacted by Construction of the Facility</b>
<i>Airport Drainage Improvements (FAA funded)</i>	<i>None</i>
<i>Terminal Expansion and Renovation (blended FAA and NYSDOT funded)</i>	<i>None</i>

The above existing facilities and facility construction projects were analyzed for disparate impacts on the basis of race, color, or national origin (including LEP) in Affected Communities. The following have disparate impacts:

<b>Facilities or Construction Projects with Disparate Impacts</b>	<b>Affected Community Impacted</b>	<b>Impact Can Be Eliminated?</b>
<i>None</i>	<i>n/a</i>	<i>n/a</i>

<sup>10</sup> 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 demonstrate that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

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

### Executive Order 13166

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

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

<b>Language</b>
<i>Spanish or Spanish Creole</i>
<i>French (incl. Patois, Cajun)</i>
<i>Other West Germanic languages</i>

**Ogdensburg Bridge and Port Authority** will collect data for languages spoken by airport guests.<sup>11</sup> Potential data sources can include:

<b>Data Sources for Languages Spoken by Airport Guests</b>	<b>Website link to Data Source</b>
<i>Assumption from flight origin / destination</i>	<a href="#"><i>Ogdensburg International Airport Website</i></a>
<i>Assistance requests to airport information desks</i>	<i>Language requests made with the airport</i>

Based on the acquired data, the following additional languages have been identified as may be spoken by LEP airport guests and are under the safe harbor threshold, see Appendix, Section 14. Population/Language Data:

<b>Languages</b>	
<i>African languages</i>	<i>Laotian</i>
<i>Arabic</i>	<i>Navajo</i>
<i>Armenian</i>	<i>Other Native American Languages</i>
<i>Cambodian</i>	<i>Other Pacific Island Languages</i>
<i>German</i>	<i>Persian</i>
<i>Greek</i>	<i>Polish</i>
<i>Gujarati</i>	<i>Russian</i>
<i>Hebrew</i>	<i>Scandinavian</i>
<i>Hindi</i>	<i>Serbo-Croatian</i>
<i>Hmong</i>	<i>Slavic</i>

<sup>11</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.

### Languages

<i>Hungarian</i>	<i>Tagalog</i>
<i>Indic</i>	<i>Thai</i>
<i>Indo-European</i>	<i>Urdu</i>
<i>Italian</i>	<i>Vietnamese</i>
<i>Japanese</i>	<i>West-Germanic Languages</i>
<i>Korean</i>	<i>Yiddish</i>

**Ogdensburg Bridge and Port Authority** 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, **Steve Lawrence, Executive Director** will inform leadership and staff of St. Lawrence County of the responsibility to provide language access.

The following plans are considered to provide translation services free of charge to ensure that individuals with limited English proficiency have access to the benefits of the airport:

#### **Translation Services:**

- Written notices should contain a statement in the identified languages, when appropriate, of how to receive translated written materials.
- The following vendors have been identified and can be utilized for written translations:

<b>Translation Vendors</b>	<b>Languages</b>
<i>Google Translate<sup>12</sup> or Microsoft Bing Translator<sup>13</sup></i>	<i>All above languages</i>

- Information regarding translation services can be obtained at:

<b>Location for Translation Assistance</b>	<b>Languages</b>
<i>Airport website assistance</i>	<i>Multiple languages</i>
<i>Volunteer multi-lingual staff pool</i>	<i>Multiple languages</i>
<i>Security Desks</i>	<i>Multiple languages</i>
<i>Public Information Counters</i>	<i>Multiple languages</i>
<i>Terminal Service Officers</i>	<i>Multiple languages</i>

#### **Interpretation Services:**

- The following vendors have been identified and can be utilized for interpretation services as needed:

<sup>12</sup> <https://translate.google.com/?sl=auto&tl=en&op=translate>

<sup>13</sup> <https://www.bing.com/Translator/>

<b>Interpretation Vendors</b>	<b>Languages</b>
<i>Google Translate<sup>14</sup> or Microsoft Bing Translator<sup>15</sup></i>	<i>All above languages</i>

<b>Location for Interpretation Assistance</b>	<b>Languages</b>
<i>Airport Website</i>	<i>Multiple languages</i>
<i>Airport information desks</i>	<i>Multiple languages</i>
<i>Security Desks</i>	<i>Multiple languages</i>
<i>Public Information Counters</i>	<i>Multiple languages</i>
<i>Terminal Services Officers</i>	<i>Multiple languages</i>

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

The Airport Administration will maintain a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient in providing interpretation and/or translation services. The list is updated annually in the Public Information Handbook and provided to all airport employees. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation, during normal business hours.

**Ogdensburg Bridge and Port Authority** can provide access to telephone interpreting, video remote interpreting and document translation services as needed, enabling departments to communicate with limited English-speaking residents easily. The airport will consider contracting with a vendor to provide on-demand telephone interpretation and/or translation services to airport users.

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

## **9. Transportation**

49 Part CFR 21 Appendix C (a)(1)(ix)

In the Community Statistics section of this plan, Affected Communities were identified along with demographic and related data for the community populations. The minority and disadvantaged community areas located within the Affected Communities are listed below. Other minority and disadvantaged community areas that are near the airport but not within Affected Communities are also identified below.

Coordination with planning entities to encourage transit service access between the airport and these areas will be sought.

<sup>14</sup> <https://translate.google.com/?sl=auto&tl=en&op=translate>

<sup>15</sup> <https://www.bing.com/Translator/>

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>
Ogdensburg Intra-city Shuttle	Fixed-route buses serving St. Lawrence County	Existing
Greyhound Bus Lines	Serves St. Lawrence County communities including Potsdam Canton, and De Kalb Junction	Existing
Flix Bus Lines	Serves St. Lawrence County communities including Potsdam Canton, and De Kalb Junction	Existing
Bus Transfers from Amtrak	Train service to Syracuse is available, with transfers by bus to St. Lawrence County destinations	Existing
Trailways	Serves St. Lawrence County communities including Canton, and Potsdam	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 and comply with New York State, Minority/Women-owned Business Enterprise (M/WBE), and Service-Disabled Veteran Owned Business (SDVOB) requirements, as applicable.

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
<i>Concessions Business</i>	<i>Comply with NYS M/WBE and SDVOB requirements, as applicable. Concessions business opportunities will be advertised through all local chambers of commerce, minority and woman owned business outreach email list. Will follow procedures for the State Minority and Woman Owned Business Enterprise Program. Bids are required to include disadvantaged business mentor component for sub-contractors. Other minority business outreach methods will be included in bid packages and announced during pre-bid meetings.</i>
<i>Shuttle Vehicle Maintenance Contract</i>	<i>Comply with NYS M/WBE and SDVOB requirements, as applicable. Shuttle vehicle maintenance contracts will be advertised through all local chambers of commerce, minority and woman owned business outreach email list. Will follow procedures for the State Minority and Woman Owned Business Enterprise Program. Bids are required to include disadvantaged business mentor component for sub-contractors. Other minority business outreach methods will be included in bid</i>

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
	<i>packages and announced during pre-bid meetings.</i>
<i>Parking Lot Operations Contract</i>	<i>Comply with NYS M/WBE and SDVOB requirements, as applicable. Parking lot operations contracts will be advertised through all local chambers of commerce, minority and woman owned business outreach email list. Will follow procedures for the State Minority and Woman Owned Business Enterprise Program. Bids are required to include disadvantaged business mentor component for sub-contractors. Other minority business outreach methods will be included in bid packages and announced during pre-bid meetings.</i>
<i>Groundskeeper Contract</i>	<i>Comply with NYS M/WBE and SDVOB requirements, as applicable. Groundskeeper contracts will be advertised through all local chambers of commerce, minority and woman owned business outreach email list. Will follow procedures for the State Minority and Woman Owned Business Enterprise Program. Bids are required to include disadvantaged business mentor component for sub-contractors. Other minority business outreach methods will be included in bid packages and announced during pre-bid meetings.</i>
<i>Additional Contracts</i>	<i>Comply with NYS M/WBE and SDVOB requirements, as applicable. Additional contracts will be advertised through all local chambers of commerce, minority and woman owned business outreach email list. Will follow procedures for the State Minority and Woman Owned Business Enterprise Program. Bids are required to include disadvantaged business mentor component for sub-contractors. Other minority business outreach methods will be included in bid packages and announced during pre-bid meetings.</i>

Outreach steps per the **Community Participation Plan (CPP)** will include advertisements, announcements, media, and print materials through marketing personnel to St. Lawrence County including Ogdensburg, Morristown, Claverack-Red Mills, Lisbon, Heuvelton, and Oswegatchie.

Selections are in compliance with Title VI, Part 21, and related requirements. Information on the award process and specific bid decisions are kept with Charlie Garrelts, Airport Manager.

## **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), sexual orientation and gender identity, creed, or age
- Title VI complaints must be forwarded to the Airport Manager
- 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 as applicable by NY law

Refresher information will be provided every three (3) years.

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

**FAA Notification.** **Ogdensburg Bridge and Port Authority** will notify FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements<sup>16</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>17</sup>

As discussed in the Title VI Complaints Section, Title VI complaints must be forwarded to FAA contacts within fifteen (15) days of receipt. For all other civil rights investigations, **Ogdensburg Bridge and Port Authority** must notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, **Ogdensburg Bridge and Port Authority** will provide FAA contacts with status updates for the investigations and reviews, until completed. For each existing investigation or review completed within five (5) years of this plan, **Ogdensburg Bridge and Port Authority** will also provide a statement about the outcome, unless previously provided.

## **13. Title VI Complaints**

49 CFR 21.11; 49 CFR 21 Appendix C (b)(3); 28 CFR 42.406(d)

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

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws
2. Not only be for employment matters<sup>18</sup>

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<sup>16</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 airport sponsor or any of its sub-recipients by any State, local or Federal agency.

<sup>17</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 airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

<sup>18</sup> Complaints of employment discrimination must be addressed as required by U.S. Equal Employment Opportunity Commission (EEOC) and other applicable authorities with jurisdiction over employment matters. If an

3. Allege misconduct by the St. Lawrence County, including airport employees, contractors, concessionaires, lessees, or tenants
4. Concern an airport facility or actions by St. Lawrence County 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 **Ogdensburg International Airport**. 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 **Charlie Garrelts, Airport Manager for Ogdensburg International Airport**.

Complaints must be filed within **120 days** of the discriminatory event, must be in writing, and must be delivered currently to:

**Charlie Garrelts**  
**Airport Manager**  
**(315) 393-4080 or cgarrelts@ogdensport.com**

If a complaint is initially made by phone, it must be supplemented with a written complaint before **120 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 their 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 **three (3) days**.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within fifteen (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

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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.



resolve the matter, and the results thereof, to the FAA Civil Rights staff. Note that complaints based on disability do not have to be forwarded to FAA. To transmit complaint information to the FAA, the Coordinator will *describe contacts and process – it is preferred for the information to be uploaded 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 **Ogdensburg International Airport**, it 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 **sixty (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 explain **Ogdensburg 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 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 **Steve Lawrence, Executive Director**
- The written appeal must be received **within sixty (60) business days** after receipt of the written decision
- The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal
- **Steve Lawrence, Ogdensburg International Airport** 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, **Ogdensburg Bridge and Port Authority** will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. **Ogdensburg 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 **Charlie Garrelts, Airport Manager for Ogdensburg International Airport** at (315) 393-4080 or **cgarrelts@ogdensport.com**.

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

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

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**1** [Ogdensburg International Airport Website](#)

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**2** *Staff Managed Airport Desks*

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## 14. Population / Language Data

	<b>St. Lawrence County, New York</b>	
<b>Label</b>	<b>Estimate</b>	<b>Margin of Error</b>
Total:	105,846	±39
Speak only English	97,228	±936
Spanish or Spanish Creole:	1,969	±255
Speak English "very well"	1,394	±238
Speak English less than "very well"	575	±116
French (incl. Patois, Cajun):	1,146	±248
Speak English "very well"	839	±194
Speak English less than "very well"	307	±130
French Creole:	68	±43
Speak English "very well"	68	±43
Speak English less than "very well"	0	±27
Italian:	335	±127
Speak English "very well"	270	±116
Speak English less than "very well"	65	±42
Portuguese or Portuguese Creole:	81	±57
Speak English "very well"	66	±54
Speak English less than "very well"	15	±16
German:	505	±194
Speak English "very well"	418	±167
Speak English less than "very well"	87	±61

Yiddish:	228	±124
Speak English "very well"	196	±118
Speak English less than "very well"	32	±26
Other West Germanic languages:	1,577	±653
Speak English "very well"	1,289	±615
Speak English less than "very well"	288	±166
Scandinavian languages:	20	±19
Speak English "very well"	6	±6
Speak English less than "very well"	14	±19
Greek:	65	±54
Speak English "very well"	28	±32
Speak English less than "very well"	37	±34
Russian:	443	±213
Speak English "very well"	256	±175
Speak English less than "very well"	187	±111
Polish:	81	±48
Speak English "very well"	56	±42
Speak English less than "very well"	25	±25
Serbo-Croatian:	60	±101
Speak English "very well"	60	±101
Speak English less than "very well"	0	±27
Other Slavic languages:	155	±131
Speak English "very well"	66	±52
Speak English less than "very well"	89	±129

Armenian:	7	±10
Speak English "very well"	7	±10
Speak English less than "very well"	0	±27
Persian:	64	±54
Speak English "very well"	31	±28
Speak English less than "very well"	33	±34
Gujarati:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Hindi:	2	±3
Speak English "very well"	2	±3
Speak English less than "very well"	0	±27
Urdu:	103	±125
Speak English "very well"	54	±76
Speak English less than "very well"	49	±55
Other Indic languages:	60	±50
Speak English "very well"	32	±44
Speak English less than "very well"	28	±28
Other Indo-European languages:	191	±136
Speak English "very well"	32	±30
Speak English less than "very well"	159	±132
Chinese:	247	±97
Speak English "very well"	150	±71
Speak English less than "very well"	97	±46

Japanese:	24	±22
Speak English "very well"	18	±18
Speak English less than "very well"	6	±10
Korean:	188	±148
Speak English "very well"	129	±146
Speak English less than "very well"	59	±33
Mon-Khmer, Cambodian:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Hmong:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Thai:	30	±38
Speak English "very well"	7	±8
Speak English less than "very well"	23	±32
Laotian:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Vietnamese:	86	±59
Speak English "very well"	7	±14
Speak English less than "very well"	79	±58
Other Asian languages:	77	±55
Speak English "very well"	62	±49
Speak English less than "very well"	15	±16

Tagalog:	49	±32
Speak English "very well"	45	±32
Speak English less than "very well"	4	±6
Other Pacific Island languages:	4	±8
Speak English "very well"	0	±27
Speak English less than "very well"	4	±8
Navajo:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Other Native North American languages:	38	±32
Speak English "very well"	38	±32
Speak English less than "very well"	0	±27
Hungarian:	10	±11
Speak English "very well"	10	±11
Speak English less than "very well"	0	±27
Arabic:	435	±318
Speak English "very well"	287	±212
Speak English less than "very well"	148	±113
Hebrew:	205	±134
Speak English "very well"	134	±89
Speak English less than "very well"	71	±63
African languages:	62	±45
Speak English "very well"	55	±44
Speak English less than "very well"	7	±12

Other and unspecified languages:	3	±4
Speak English "very well"	0	±27
Speak English less than "very well"	3	±4

**Poverty Data (S1701):**

<b>Label</b>	<b>St. Lawrence County, New York</b>
Population estimates, July 1, 2023, (V2023)	106,940
Population estimates base, April 1, 2020, (V2023)	108,501
Population, percent change - April 1, 2020 (estimates base) to July 1, 2023, (V2023)	-1.40%
Population, Census, April 1, 2020	108,505
Population, Census, April 1, 2010	111,944
Persons under 5 years, percent	4.80%
Persons under 18 years, percent	19.60%
Persons 65 years and over, percent	19.00%
Female persons, percent	48.90%
White alone, percent	94.00%
Black or African American alone, percent	2.10%
American Indian and Alaska Native alone, percent	1.10%
Asian alone, percent	1.20%
Native Hawaiian and Other Pacific Islander alone, percent	0.10%
Two or More Races, percent	1.50%
Hispanic or Latino, percent	2.40%

**15. Completed Unlawful Discrimination Poster**

**Subsequent Translation in Spanish attached.**



## Appendix: Figure 1 – OGS Airport Capital Investment Plan (ACIP)

### Ogdensburg International Airport

Airport:		Ogdensburg International Airport		State:		NY		NPIAS #:		36-0009		LOC ID:		OGS		Date:		4/19/2024	
Project Description/Narrative	NPR	Work Code	Federal Funds (\$1,000)					BIL Funding	State Matching Funds (\$1,000)	Local (\$1,000)			Totals (\$1,000)	Environmental Type	Environmental Status	Comments			
			Entitlement	Cargo Entitlement	Discretionary	State Apportion.	Supplementary Discretionary			FPC	Other	State funded only							
<b>2024 (entitlements estimated at \$1,000,000)</b>																			
Terminal Improvements - Construction	46	CA TE EX						\$ 2,600	\$ 68		\$ 68		\$ 2,736	EA	FONSI				
Terminal Improvements - Construction	46	CA TE EX	\$ 2,000					\$ 53		\$ 53		\$ 2,106	EA	FONSI					
<b>Total FY2024</b>			\$ 2,000	\$ -	\$ -	\$ -	\$ -	\$ 2,600	\$ 121	\$ -	\$ 121	\$ -	\$ 4,842						
<b>2025 (entitlements estimated at \$150,000)</b>																			
Terminal Improvements - Construction	46	CA TE EX	\$ 133					\$ 4		\$ 4		\$ 140	EA	FONSI					
Terminal Improvements - Construction	46	CA TE EX						\$ 200	\$ 5	\$ 5		\$ 210	EA	FONSI					
<b>Total FY2025</b>			\$ 133	\$ -	\$ -	\$ -	\$ -	\$ 200	\$ 9	\$ 9	\$ -	\$ 350							
<b>2026 (entitlements estimated at \$150,000)</b>																			
Construct Snow Removal Equipment Building (17,000SF) (Construction)	50	ST BD SN	\$ 167		\$ 3,934			\$ 200	\$ 113		\$ 113		\$ 4,527	CATEX	CATEX 4/23/2021				
<b>Total FY2026</b>			\$ 167	\$ -	\$ 3,934	\$ -	\$ -	\$ 200	\$ 113	\$ -	\$ 113	\$ -	\$ 4,527						
<b>2027 (entitlements estimated at \$150,000)</b>																			
GA Apron Reconstruction - Design	68	RE AP CD	\$ 150		\$ 278				\$ 11		\$ 11		\$ 451	CATEX	8/3/2018				
<b>Total FY2027</b>			\$ 150	\$ -	\$ 278	\$ -	\$ -	\$ -	\$ 11	\$ -	\$ 11	\$ -	\$ 451						
<b>2028 (entitlements estimated at \$150,000)</b>																			
GA Apron Reconstruction - Construct	68	RE AP CD	\$ 150		\$ 4,125				\$ 113		\$ 113		\$ 4,500	CATEX	8/3/2018				
<b>Total FY2028</b>			\$ 150	\$ -	\$ 4,125	\$ -	\$ -	\$ -	\$ 113	\$ -	\$ 113	\$ -	\$ 4,500						
<b>2029 (entitlements estimated at \$150,000)</b>																			
RW 9-27 Rehab - Design	80	RE RW CO	\$ 150		\$ 373				\$ 14		\$ 14		\$ 551	CATEX	Not Started				
<b>Total FY2029</b>			\$ 150	\$ -	\$ 373	\$ -	\$ -	\$ -	\$ 14	\$ -	\$ 14	\$ -	\$ 551						
<b>2030 (entitlements estimated at \$150,000)</b>																			
Acquire ARFF Equipment	87	SA EQ RF	\$ 150		\$ 562				\$ 19		\$ 19		\$ 750	CATEX	Not Started				
<b>Total FY2030</b>			\$ 150	\$ -	\$ 562	\$ -	\$ -	\$ -	\$ 19	\$ -	\$ 19	\$ -	\$ 750						
<b>2031 (entitlements estimated at \$150,000)</b>																			
RW 9-27 Rehab - Construct	80	RE RW CO	\$ 150		\$ 5,550				\$ 150		\$ 150		\$ 6,000	CATEX	Not Started				
<b>Total FY2031</b>			\$ 150	\$ -	\$ 5,550	\$ -	\$ -	\$ -	\$ 150	\$ -	\$ 150	\$ -	\$ 6,000						
<b>2032 (entitlements estimated at \$150,000)</b>																			
Snow Removal Equipment Acquisition Flow w Spreader	75	ST EQ SN	\$ 150		\$ 420				\$ 15		\$ 15		\$ 600	CATEX	Not Started				
<b>Total FY2032</b>			\$ 150	\$ -	\$ 420	\$ -	\$ -	\$ -	\$ 15	\$ -	\$ 15	\$ -	\$ 600						