

Approved April 16, 2024

Sponsor Title VI Plan
Northwest Regional Airport Authority / Cherry Capital Airport (TVC)

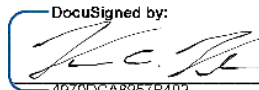
1. Title VI Policy Statement¹

The Northwest Regional Airport Authority (NRAA) 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.

NRAA 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 **NRAA** will take action to involve them and the general public in the decision making process.

NRAA 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 **NRAA** and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors at the Cherry Capital Airport (TVC).

Mark Bishop, Chief Financial Officer, available at **231-947-2250, ext 102** and **mark.bishop@tvairport.com**, is responsible for overseeing the Airport Sponsor’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.

DocuSigned by:

4970DCA8957B402...
Signature
Kevin C. Klein
Chief Executive Officer

April 16, 2024
Effective Date

April 15, 2027
Expiration Date (3 Yrs from Effect 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 NRAA Board has reviewed and adopted this Title VI Plan for **the NRAA**. 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 **Board** and resubmittal to FAA.

In addition to the Coordinator and airport sponsor's leadership, the following people also assist with our Title VI program requirements:

Staff Supporting Title VI Program	Airport Sponsor Program / Office
<i>Mark Bishop</i>	<i>Coordinator/Administration</i>
<i>Heather Sexton</i>	<i>Accounting Manager/Administration</i>
<i>Karrie Zeits</i>	<i>General Counsel/Administration</i>
<i>Bob Nelesen</i>	<i>Grant Program Manager/Administration</i>

NRAA has the following airport program sub-recipients: **None**.

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

Federal Source	Grant Number	Amount
<i>FAA AIP</i>	<i>3-26-0094-049-2021</i>	<i>\$2,341,200</i>
<i>FAA AIP</i>	<i>3-26-0094-053-2022</i>	<i>\$2,595,411</i>
<i>FAA AIP</i>	<i>3-26-0094-054-2023</i>	<i>\$4,568,714</i>
<i>FAA AIP</i>	<i>3-26-0094-055-2023</i>	<i>\$5,225,000</i>
<i>DOT</i>	<i>DOT-OST-2023-0037</i>	<i>\$750,000</i>
<i>FAA FAST</i>	<i>23-FAA-FAST-01</i>	<i>\$2,137,012</i>

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

Federal Source	Grant Award Information Available at:
<i>DHS</i>	<i>www.DHSgrantinfo.gov</i>
<i>DOJ</i>	<i>www.USgrantsinfo.net</i>
<i>FAA AIP</i>	<i>https://www.faa.gov/airports/aip/</i>
<i>FAA FAST</i>	<i>www.grants.gov</i>

3. Grant and Procurement Assurances

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

NRAA will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See https://www.faa.gov/airports/aip/grant_assurances/#current-assurances.

Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/. Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. **NRAA** requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

Description of Oversight Methods for Subcontracts

Title VI requirements language template must be used in all subcontracts related to the airport program. Not less than 10% of the NRAA's contractors, tenants, concessionaires, and licensees will be audited by Airport administration annually to verify the subcontracts include the template language.

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 **NRAA** 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)

NRAA will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. The Coordinator ensures that these posters are visible, accessible,² and maintained. The poster template is available at https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/ and a completed copy is attached. See Section 15 Appendix.

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

The NRAA will distribute this Title VI Plan among its employees and airport contractors,

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

concessionaires, lessees, and tenants. This plan **will be** distributed by **not more than 30 days following adoption by the NRAA Board by email.**

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
<i>Terminal Vending</i>	<i>1</i>		
<i>Terminal 2nd Floor Administration</i>			<i>1</i>
<i>Terminal Post-Security Recomposure</i>		<i>1</i>	
<i>AvFlight Offices</i>			<i>1</i>
<i>45 North Offices</i>			<i>1</i>
<i>Denton Farms / Giving Wings</i>			<i>1</i>
<i>ARFF Building</i>			<i>1</i>
<i>SRE Building</i>			<i>1</i>

Outreach to Affected Communities

Airport Administration ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify the effective media platforms to share announcement and notices. Announcements are made in social media, general circulation newspapers, community newspapers, and email broadcast. **Airport Administration** contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities³ 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.

The NRAA will create a detailed CPP **on or before December 31, 2024**. A copy of the plan will be available at www.tvcairport.com.

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

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

6. Community Statistics

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). By knowing this information, the **NRAA** will be able to identify, understand, and engage with communities. In doing so, the **NRAA** needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by **the NRAA's** airport program. The Affected Communities for TVC have been identified by the entirety of the two counties within the 10 mile radius air space zoning being implemented by the NRAA.

Affected Communities ⁴	Population
<i>Grand Traverse County</i>	96,421
<i>Leelanau County</i>	23,019

- <https://www.census.gov/quickfacts/fact/table/grandtraversecountymichigan/BZA115221>
- <https://www.census.gov/quickfacts/fact/table/leelanaucountymichigan/BZA115221>

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 Communities⁵

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,” **NRAA** is collecting information about affected and potentially affected low-income communities. According to ***U.S. Census Quick Facts Report*** the overall poverty level for the Affected Communities is approximately **7.4%-9.5%**. The poverty rate remains lower compared with the rest of the **State at 13.4%**. The poverty rates for the specific Affected Communities are as follows:

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

⁵ Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, this data will be utilized in our Community Participation Plan (CPP) to help ensure the meaningful involvement of low income communities in airport programs and activities.

Affected Communities	Poverty Rate
<i>Grand Traverse County</i>	9.5%
<i>Leelanau County</i>	7.4%

- <https://www.census.gov/quickfacts/fact/table/grandtraversecountymichigan/BZA115221>
- <https://www.census.gov/quickfacts/fact/table/leelanaucountymichigan/BZA115221>

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 follows⁶:

Affected Community: Grand Traverse County **Total Affected Community Population: 96,421**

Demographic Group within Affected Community	Number of People in Minority Group*	Percent of Total Affected Community Population
<i>White</i>	91,504	94.9%
<i>Black or African American</i>	868	0.9%
<i>American Indian or Alaska Native</i>	1,253	1.3%
<i>Asian</i>	868	0.9%
<i>Native Hawaiian or Other Pacific Islander</i>	96	0.1%
<i>Hispanic or Latino</i>	3,182	3.3%
<i>More than one</i>	1,928	2.0%

*Numbers calculated based on percentages reported in source.

Affected Community: Leelanau County **Total Affected Community Population: 23,019**

Demographic Group within Affected Community	Number of People in Minority Group*	Percent of Total Affected Community Population
<i>White</i>	21,546	93.6%
<i>Black or African American</i>	138	0.6%
<i>American Indian or Alaska Native</i>	737	3.2%
<i>Asian</i>	138	0.6%
<i>Native Hawaiian or Other Pacific Islander</i>	23	0.1%
<i>Hispanic or Latino</i>	1,036	4.5%
<i>More than one</i>	437	1.9%

*Numbers calculated based on percentages reported in source.

- <https://www.census.gov/quickfacts/fact/table/grandtraversecountymichigan/BZA115221>

⁶ Recommend using demographic groups from the U.S. Census.

- <https://www.census.gov/quickfacts/fact/table/leelanaucountymichigan/BZA115221>

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that **NRAA** communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁷ that are spoken in LEP households in the Affected Communities. The data source is **the U.S. Census Bureau**.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.⁸ The safe harbor for 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>None</i>	--	--

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>None</i>				

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

Additional Languages Spoken

<i>None</i>

⁷ 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.

⁸ See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

This information is updated annually⁹ 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/ACSDT5Y2015.B16001?t=Language%20Spoken%20at%20Home&g=040XX00US26_050XX00US26055,26089

Beneficiary Diversity.

Demographic information will be 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

- *When the NRAA conducts passenger surveys, it will include a voluntary demographic survey capturing the following data:
Race/ethnicity
Fluency in English*

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 NRAA will provide new and existing employees a voluntary demographic survey which includes race and fluency in English in connection with Title VI Training.*
- *Every three years, the NRAA will send an email to NRAA Board and Committee members asking them to voluntarily and anonymously enter demographic information on race and fluency in English through an online survey.*

⁹ Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan’s 3-year period.

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 **NRAA** 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.¹⁰

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

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
<i>North & West Runway</i>	<i>Grand Traverse & Leelanau Counties</i>
<i>South & East Runway</i>	<i>Grand Traverse County</i>
<i>Terminal</i>	<i>Grand Traverse County</i>
<i>ARFF Building</i>	<i>Grand Traverse County</i>
<i>SRE Building</i>	<i>Grand Traverse County</i>

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

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
<i>Terminal Expansion</i>	<i>Grand Traverse County</i>

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>		

Justifications:
N/A

¹⁰ In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

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

8. Limited English Proficiency (LEP)
Executive Order 13166

In creating a Language Assistance Plan, the **NRAA** 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>None</i>

NRAA also collects data for languages spoken by airport guests.¹¹ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
<i>Airline-provided data</i>	<i>N/A</i>
<i>Traverse City Tourism Kiosk</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 the **NRAA** of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that

¹¹ We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language was not available beforehand, or the safe harbor threshold for written translation was not met.

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>None</i>	

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
<i>Airport website translate view</i>	<i>Spanish, Chinese, Dutch, French, German, Italian, Japanese</i>
<i>Google Translate</i>	<i>https://translate.google.com/</i>

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>None</i>	

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
<i>Administrative Offices or Operations Personnel with Google Translate</i>	<i>https://translate.google.com/</i>

Description of Interpretation Assistance Processes

To ensure that individuals with LEP have access to the benefits of the airport, those unable to communicate via airline resources will be directed to contact Airport operations or be guided to Second Level Administration Offices for assistance via Google Translate.

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 **Bay Area Transportation Authority** and they currently 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
Grand Traverse & Leelanau Counties	Bay Area Transit Authority - fixed-route buses	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>Public Works Contracts Including all construction contracts, those with FAA funding and local-funded procurements</i>	<i>In addition to advertising through the Airport's website, NRAA will contact known DBE contractors and vendors when there is an opportunity and review the State of Michigan's DBE vendor search toolkit to determine whether there are any DBEs that should be reached out to. Additionally, advertisements for all capital projects will be placed on the State of Michigan prequalified DBE Directory and the local builder's exchange.</i>
<i>Concession Opportunities</i>	<i>In addition to advertising through the Airport's website, https://tvcairport.com/tvc-public-notice/, when there are concessionaire opportunities at the Airport, NRAA will contact known</i>

	<i>DBE/WBE vendors and will work with the local chamber of commerce to develop a process for distributing opportunities to its minority and woman-owned business constituents.</i>

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 **Chief Financial Officer**.

11. Training

New employee orientation will incorporate Title VI training. Topics will 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 requirements¹²
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹³

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, **NRAA** 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 matters¹⁴
3. Allege misconduct by the **NRAA**, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the **NRAA** including airport employees, contractors, concessionaires, lessees, or tenants.

¹² Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the airport sponsor or any of its sub-recipients by any State, local or Federal agency.

¹³ Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

¹⁴ Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the **NRAA**.¹⁵ Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to **General Counsel and the Chief Executive Officer**.

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

Mark Bishop, Chief Financial Officer and Title VI Coordinator
Northwest Regional Airport Authority
727 Fly Don't Drive
Traverse City, MI 49686
231-947-2250
Mark.Bishop@tvairport.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 ***one business day of receipt if received by mail or in person or within one business day from the day following receipt if received by email.***

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 it to the FAA Civil Rights Connect System and confirm receipt via email**. The Coordinator will also seek technical assistance from FAA, as needed, throughout

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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 **NRAA**, 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 **mediation with the complainant and contractor/tenant/other persons involved in the dispute.**

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 **NRAA'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 21** 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 **Airport's 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, the **NRAA** will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. **NRAA** 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 **Mark Bishop, Title VI Coordinator**.

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

Website, In-person, and Other Distribution Methods

1 The Airport's Title VI complaint policy is posted on the Airport's Title VI page at:

<https://tvcairport.com/tvc-public-notices/>

2 The public can request and receive the complaint policy through the Administration Office by calling 231-947-2250 or email at admin@tvcairport.com. These methods are included on our website and direction has been provided to the Administrative Assistant that all complaints or inquiries related to Title VI or race/gender discrimination be forwarded to the phone number and email noted above.

14. Population / Language Data

QuickFacts

Grand Traverse County, Michigan; Leelanau County, Michigan

QuickFacts provides statistics for all states and counties. Also for cities and towns with a *population of 5,000 or more*.

All Topics ▼	Grand Traverse County, Michigan	Leelanau County, Michigan
Total employment, percent change, 2020-2021	-4.6%	-7.1%
PEOPLE		
Population		
Population estimates, July 1, 2023, (V2023)	△ 96,421	△ 23,019
Population Estimates, July 1, 2022, (V2022)	△ 96,298	△ 22,883
Population estimates base, April 1, 2020, (V2023)	△ 95,251	△ 22,300
Population estimates base, April 1, 2020, (V2022)	△ 95,251	△ 22,300
Population, percent change - April 1, 2020 (estimates base) to July 1, 2023, (V2023)	△ 1.2%	△ 3.2%
Population, percent change - April 1, 2020 (estimates base) to July 1, 2022, (V2022)	△ 1.1%	△ 2.6%
Population, Census, April 1, 2020	95,238	22,301
Population, Census, April 1, 2010	86,986	21,708
Age and Sex		
Persons under 5 years, percent	△ 4.7%	△ 3.5%
Persons under 18 years, percent	△ 19.2%	△ 15.1%
Persons 65 years and over, percent	△ 22.2%	△ 34.0%
Female persons, percent	△ 50.4%	△ 50.1%
Race and Hispanic Origin		
White alone, percent	△ 94.9%	△ 93.6%
Black or African American alone, percent (a)	△ 0.9%	△ 0.6%
American Indian and Alaska Native alone, percent (a)	△ 1.3%	△ 3.2%
Asian alone, percent (a)	△ 0.9%	△ 0.6%
Native Hawaiian and Other Pacific Islander alone, percent (a)	△ 0.1%	△ 0.1%
Two or More Races, percent	△ 2.0%	△ 1.9%
Hispanic or Latino, percent (b)	△ 3.3%	△ 4.5%
White alone, not Hispanic or Latino, percent	△ 92.2%	△ 90.3%
Population Characteristics		
Veterans, 2018-2022	5,860	1,546
Foreign born persons, percent, 2018-2022	2.1%	1.9%
Housing		
Housing units, July 1, 2022, (V2022)	46,909	15,742
Owner-occupied housing unit rate, 2018-2022	75.9%	89.9%
Median value of owner-occupied housing units, 2018-2022	\$273,300	\$371,200
Median selected monthly owner costs -with a mortgage, 2018-2022	\$1,478	\$1,640
Median selected monthly owner costs -without a mortgage, 2018-2022	\$552	\$584
Median gross rent, 2018-2022	\$1,147	\$1,157
Building permits, 2022	711	178
Families & Living Arrangements		
Households, 2018-2022	38,572	9,246
Persons per household, 2018-2022	2.42	2.39
Living in same house 1 year ago, percent of persons age 1 year+, 2018-2022	87.0%	89.1%
Language other than English spoken at home, percent of persons age 5 years+, 2018-2022	2.9%	3.9%
Computer and Internet Use		
Households with a computer, percent, 2018-2022	94.9%	95.6%
Households with a broadband Internet subscription, percent, 2018-2022	89.6%	90.7%
Education		
High school graduate or higher, percent of persons age 25 years+, 2018-2022	94.9%	96.2%
Bachelor's degree or higher, percent of persons age 25 years+, 2018-2022	38.7%	48.6%
Health		
With a disability, under age 65 years, percent, 2018-2022	8.3%	9.3%
Persons without health insurance, under age 65 years, percent	△ 5.4%	△ 7.2%

Economy		
In civilian labor force, percent of population age 16 years+, 2018-2022	64.2%	51.8%
In civilian labor force, female, percent of population age 16 years+, 2018-2022	59.3%	51.3%
Total accommodation and food services sales, 2017 (\$1,000) (c)	441,917	88,085
Total health care and social assistance receipts/revenue, 2017 (\$1,000) (c)	1,290,166	51,494
Total transportation and warehousing receipts/revenue, 2017 (\$1,000) (c)	92,972	7,070
Total retail sales, 2017 (\$1,000) (c)	2,311,673	164,357
Total retail sales per capita, 2017 (c)	\$25,150	\$7,596
Transportation		
Mean travel time to work (minutes), workers age 16 years+, 2018-2022	20.9	24.3
Income & Poverty		
Median household income (in 2022 dollars), 2018-2022	\$75,553	\$82,345
Per capita income in past 12 months (in 2022 dollars), 2018-2022	\$40,644	\$48,491
Persons in poverty, percent	△ 9.5%	△ 7.4%


BUSINESSES


Businesses		
Total employer establishments, 2021	3,435	772
Total employment, 2021	44,418	4,367
Total annual payroll, 2021 (\$1,000)	2,360,769	226,897
Total employment, percent change, 2020-2021	-4.6%	-7.1%
Total nonemployer establishments, 2021	10,081	3,050
All employer firms, Reference year 2017	2,920	648
Men-owned employer firms, Reference year 2017	1,784	399
Women-owned employer firms, Reference year 2017	S	81
Minority-owned employer firms, Reference year 2017	53	S
Nonminority-owned employer firms, Reference year 2017	2,494	578
Veteran-owned employer firms, Reference year 2017	143	62
Nonveteran-owned employer firms, Reference year 2017	2,376	518

GEOGRAPHY

Geography		
Population per square mile, 2020	205.1	64.2
Population per square mile, 2010	187.3	62.5
Land area in square miles, 2020	464.34	347.20
Land area in square miles, 2010	464.33	347.17
FIPS Code	26055	26089

Value Notes

 Methodology differences may exist between data sources, and so estimates from different sources are not comparable.

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info  icon to the left of each row in TABLE view to learn about sampling error.

The vintage year (e.g., V2023) refers to the final year of the series (2020 thru 2023). Different vintage years of estimates are not comparable.

Users should exercise caution when comparing 2018-2022 ACS 5-year estimates to other ACS estimates. For more information, please visit the [2022 5-year ACS Comparison Guidance](#) page.

Fact Notes

- (a) Includes persons reporting only one race
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data
- (b) Hispanics may be of any race, so also are included in applicable race categories

Value Flags

- Either no or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest or upper interval of an open ended distribution
- F Fewer than 25 firms
- D Suppressed to avoid disclosure of confidential information
- N Data for this geographic area cannot be displayed because the number of sample cases is too small.
- FN Footnote on this item in place of data
- X Not applicable
- S Suppressed; does not meet publication standards
- NA Not available
- Z Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

Table: ACSDT5Y2015.B16001

	Grand Traverse County, Michigan		Leelanau County, Michigan	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Total:	84,904	±173	20,959	±13
Speak only English	81,265	±574	19,852	±229
Spanish or Spanish Creole:	1,692	±427	554	±103
Speak English "very well"	1,277	±336	358	±90
Speak English less than "very well"	415	±228	196	±92
French (incl. Patois, Cajun):	244	±115	14	±13
Speak English "very well"	206	±106	11	±12
Speak English less than "very well"	38	±47	3	±5
French Creole:	31	±52	0	±18
Speak English "very well"	31	±52	0	±18
Speak English less than "very well"	0	±23	0	±18
Italian:	65	±48	25	±37
Speak English "very well"	61	±46	1	±2
Speak English less than "very well"	4	±7	24	±37
Portuguese or Portuguese Creole:	24	±27	5	±9
Speak English "very well"	4	±6	0	±18
Speak English less than "very well"	20	±26	5	±9
German:	310	±114	111	±45
Speak English "very well"	258	±109	95	±38
Speak English less than "very well"	52	±41	16	±25
Yiddish:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18

Table: ACSDT5Y2015.B16001

	Grand Traverse County, Michigan		Leelanau County, Michigan	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Speak English less than "very well"	0	±23	0	±18
Other West Germanic languages:	89	±67	14	±20
Speak English "very well"	67	±62	7	±8
Speak English less than "very well"	22	±28	7	±16
Scandinavian languages:	29	±48	5	±7
Speak English "very well"	29	±48	5	±7
Speak English less than "very well"	0	±23	0	±18
Greek:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	0	±18
Russian:	172	±171	0	±18
Speak English "very well"	156	±167	0	±18
Speak English less than "very well"	16	±18	0	±18
Polish:	16	±22	19	±14
Speak English "very well"	16	±22	11	±9
Speak English less than "very well"	0	±23	8	±8
Serbo-Croatian:	130	±136	0	±18
Speak English "very well"	72	±70	0	±18
Speak English less than "very well"	58	±89	0	±18
Other Slavic languages:	185	±278	8	±8
Speak English "very well"	79	±119	4	±7

Table: ACSDT5Y2015.B16001

	Grand Traverse County, Michigan		Leelanau County, Michigan	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Speak English less than "very well"	106	±160	4	±5
Armenian:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	0	±18
Persian:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	0	±18
Gujarati:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	0	±18
Hindi:	5	±10	18	±16
Speak English "very well"	5	±10	18	±16
Speak English less than "very well"	0	±23	0	±18
Urdu:	0	±23	38	±42
Speak English "very well"	0	±23	38	±42
Speak English less than "very well"	0	±23	0	±18
Other Indic languages:	44	±52	2	±4
Speak English "very well"	6	±10	0	±18
Speak English less than "very well"	38	±50	2	±4
Other Indo-European languages:	4	±7	131	±182
Speak English "very well"	4	±7	88	±122

Table: ACSDT5Y2015.B16001

	Grand Traverse County, Michigan		Leelanau County, Michigan	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Speak English less than "very well"	0	±23	43	±61
Chinese:	41	±58	2	±5
Speak English "very well"	24	±37	2	±5
Speak English less than "very well"	17	±23	0	±18
Japanese:	27	±33	24	±24
Speak English "very well"	19	±31	21	±24
Speak English less than "very well"	8	±12	3	±5
Korean:	22	±28	36	±42
Speak English "very well"	5	±8	19	±20
Speak English less than "very well"	17	±26	17	±25
Mon-Khmer, Cambodian:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	0	±18
Hmong:	35	±45	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	35	±45	0	±18
Thai:	6	±10	16	±14
Speak English "very well"	0	±23	12	±12
Speak English less than "very well"	6	±10	4	±8
Laotian:	97	±129	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	97	±129	0	±18

Table: ACSDT5Y2015.B16001

Label	Grand Traverse County, Michigan		Leelanau County, Michigan	
	Estimate	Margin of Error	Estimate	Margin of Error
Vietnamese:	69	±81	0	±18
Speak English "very well"	7	±7	0	±18
Speak English less than "very well"	62	±80	0	±18
Other Asian languages:	19	±18	8	±12
Speak English "very well"	8	±12	0	±18
Speak English less than "very well"	11	±18	8	±12
Tagalog:	19	±18	0	±18
Speak English "very well"	15	±17	0	±18
Speak English less than "very well"	4	±8	0	±18
Other Pacific Island languages:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	0	±18
Navajo:	0	±23	2	±4
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	2	±4
Other Native North American languages:	232	±219	38	±23
Speak English "very well"	232	±219	37	±23
Speak English less than "very well"	0	±23	1	±2
Hungarian:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	0	±18
Arabic:	22	±26	11	±12

Table: ACSDT5Y2015.B16001

	Grand Traverse County, Michigan		Leelanau County, Michigan	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Speak English "very well"	18	±24	4	±5
Speak English less than "very well"	4	±9	7	±10
Hebrew:	0	±23	0	±18
Speak English "very well"	0	±23	0	±18
Speak English less than "very well"	0	±23	0	±18
African languages:	10	±23	12	±17
Speak English "very well"	0	±23	12	±17
Speak English less than "very well"	10	±23	0	±18
Other and unspecified languages:	0	±23	14	±22
Speak English "very well"	0	±23	4	±7
Speak English less than "very well"	0	±23	10	±15

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: Mark H. Bishop
Phone: 231-947-2250
Address: 727 Fly Don't Drive
Traverse City, MI 49686

Discriminacion Ilegal

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

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

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

Coordinador: Mark H. Bishop
Teléfono: 231-947-2250
Dirección: 727 Fly Don't Drive
Traverse City, MI 49686



U.S. Department of Transportation
Federal Aviation Administration

16. Affected Area Map




CHERRY CAPITAL AIRPORT
GRAND TRAVERSE COUNTY, MICHIGAN
AIRPORT AREA


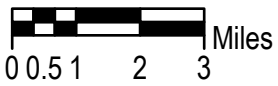
LEELANAU COUNTY

GRAND TRAVERSE COUNTY

44° 44' 29.65" N, 85° 34' 55.47" W

LEGEND

-  TVC Airport Area
-  Airport Reference Point
-  County Boundary

Miles

Prein&Newhof

2230234