

Juneau International Airport (JNU)  
Americans with Disabilities Act (ADA) Transition Plan  
& 2019 ADA Self-Evaluation

February 2020



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## Introduction

The Americans with Disabilities Act (ADA) is a civil rights law prohibiting discrimination against individuals on the basis of disability. It was enacted on July 26, 1990, and was amended in 2008 with the ADA Amendments Act. The ADA consists of five titles outlining protections in the following areas:

- I. Employment
- II. State and local government services
- III. Public accommodations
- IV. Telecommunications
- V. Miscellaneous Provisions

Title II of ADA pertains to the programs, activities and services provided by public entities. The City and Borough of Juneau (CBJ), owner of the Juneau International Airport (JNU) completed its Transition Plan in 1998 to comply with the ADA, but JNU Airport was not included in such Plan. This ADA Transition Plan serves as a supplement to the original CBJ Plan, and focuses on ADA compliance at JNU. It uses the 2010 ADA Design Standards as the basis for Self-Evaluation of facilities and programs.

Under Title II, the City and Borough of Juneau must meet these general requirements:

- Operate its programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities [28 CFR Sec. 35.150].
- Not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability [28 CFR Sec. 35.130 (a)].
- Make reasonable modifications in policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result [28 CFR Sec. 35.130(b)(7)].
- Not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective [28 CFR Sec. 35.130(b)(iv) & (d)].
- Take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others [29 CFR Sec. 35.160(a)].
- Designate at least one responsible employee to coordinate ADA compliance [28 CFR Sec. 35.107(a)].
- Provide notice of ADA requirements including information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [28 CFR Sec. 35.106].
- Adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [28 CFR Sec. 35.107(b)].

## Purpose

The Federal Aviation Administration (FAA) Office of Civil Rights conducted an on-site mini-review of JNU's compliance with the ADA in September 2017. Appendix A contains the templates and checklists that are relevant to FAA required compliance with the ADA. Appendix B contains reports that resulted from the September 2017 review, and also includes JNU's compliance with all items (noted in red font). JNU conducted a Self-Evaluation of its services, programs, activities, and facilities in the public areas of the airport in 2019; those findings are incorporated Appendix C.

## Designation of Responsibility

In accordance with 28 CFR 35.107(a), the CBJ has designated the following person to serve as ADA Title II Coordinator, to oversee ADA policies and procedures:

Name: Mila Cosgrove

Job Title: Deputy City Manager

Phone: (907) 586-5240

Email: Mila.Cosgrove@juneau.org

The ADA Coordinator will identify resources and opportunities for agency employees at various levels to receive ADA-related training appropriate to their job functions.

CBJ is the owner of the Juneau International Airport (JNU). Its facilities and programs operate as an enterprise fund that are overseen by the JNU Airport Board that is appointed by the CBJ Assembly. The Airport's day-to-day operations are managed by the JNU Airport Manager who is hired by the Airport Board. In accordance with 28 CFR 35.150(d)(3), JNU has designated the following person to serve as ADA Transition Plan Implementation Coordinator, to monitor the JNU progress and manage review and updates of this document:

Name: Patricia K. Wahto

Job Title: JNU Airport Manager

Phone: (907) 789-7821

Email: Patty.Wahto@jnuairport.com

## Self-Evaluation

Under Title II of the ADA (28 CFR Sec. 35.105), public entities are required to perform a self-evaluation of their current services, policies and practices with regard to accessibility so as to verify that, in managing its programs and facilities, the agency is providing accessibility and not adversely affecting the full participation of individuals with disabilities.

The intent of this ADA Self-Evaluation is to review JNU's public programs and facilities every three years in order to identify any obstacles or barriers to accessibility that need to be addressed. The general categories of items to be evaluated are:

- A. **Communications, Information & Facility Signage** throughout public areas of the airport.
- B. **Building and Vehicle Facilities**, including the airport terminal building, parking lots for employees and the public (short-term and long-term), taxi waiting areas, public transit stop, and access to/from the rental car parking lot.
- C. **Pedestrian Facilities**, including sidewalks, curb ramps, bicycle routes, and routes from parking areas that are located in proximity of the airport terminal building.
- D. **Administrative Procedures**, including monitoring complaints, Terminal Evacuation Plan, plans for Limited English Proficiency, and lease and contract compliance.

Following the on-site ADA compliance mini-review by the FAA Office of Civil Rights staff in 2017, JNU reviewed its services, programs, activities, and facilities on public areas of the airport, and began remedying the items that were identified (see Appendix B).

In 2019, a Self-Evaluation was performed by JNU staff. Accessibility obstacles and barriers discovered during this review are summarized in Appendix C. Using the forms included in Appendix A, JNU will perform Self-Evaluations every three years from the 2019 date.

The four categories of ADA Self-Evaluation compliance (A through D above) are described in greater detail below:

## **A. Communications, Information & Facility Signage**

JNU is responsible for the following Communications, Information, and Facility Signage:

- Public address and emergency systems (e.g., fire alarms)
- TTY/TTD telephones in public areas
- Information displays in public facilities, including Closed Caption on applicable devices
- Interior and Exterior Signage of public area facilities
- JNU Airport Website and digital/social media sites

The 2019 Self-Evaluation did not identify any accessibility barriers related to Communications, Information and Facility Signage.

## **B. Buildings and Vehicle Facilities**

JNU is responsible for the following public building and vehicle facilities:

- Terminal Building, including accessible routes, restrooms, counters, etc.
- Long Term Parking Lot
- Short Term Parking Lot
- Employee Parking Lot
- Taxi Waiting Area
- Car Rental Lot (limited to access to/from car rental lot; rental car agencies are responsible for ADA compliance related to rental car operations)

In 2008, JNU began a multi-phase renovation and expansion of the airport terminal building that included improvements to passenger arrival areas (aka “front curb”). The first phase was completed in 2012, and the second phase will begin construction in 2020. These renovation projects addressed the majority of accessibility issues in the terminal building and parking lots.

The 2019 Self-Evaluation provided in Appendix C identifies current accessibility barriers that are not included for correction in the 2020 construction project.

## **C. Pedestrian Facilities**

JNU is responsible for the following public pedestrian facilities:

- Pedestrian pathways to/from public parking lots to/from the terminal building
- Drop-off and pick-up pedestrian pathways to/from the terminal building
- Pedestrian pathways to/from the rental car parking area to/from the terminal building
- Pedestrian pathways to/from the public transit stop to/from the terminal building

The 2019 Self-Evaluation did not identify any accessibility barriers relating to Pedestrian Facilities.

## **D. Administrative Procedures**

JNU is responsible for compliance with specific aspects of the ADA that include the following administrative policies and procedures:

- Limited English Proficiency (LEP) Plan

- Airport Emergency Plan
- Title VI Plan
- Monitoring public ADA complaints
- Monitoring leases and air carrier agreements for compliance with the ADA
- Posting an “unlawful discrimination” poster in the appropriate location
- Monitoring ground transportation rules and regulations for compliance with the ADA

## Public Outreach

This document will be added to the CBJ’s Transition Plan and will be made available on the JNU Airport page of the City and Borough of Juneau’s website.

## Public Notice of ADA Requirements and Grievance Procedure

If users of JNU’s facilities and services believe JNU has not provided a reasonable accommodation, they have the right to file a grievance. In accordance with 28 CFR Sec. 35.107(b), the CBJ has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens’ complaints or concerns. This grievance procedure can be found at <https://beta.juneau.org/manager/ada-information>. Complaints and grievances at JNU will be tracked and monitored by JNU, and reported to the FAA as required.

## Progress Monitoring and Transition Plan Management


This Transition Plan at JNU is considered to be a living document that JNU will update as conditions within the CBJ evolve. JNU will conduct a self-evaluation of its public facilities identified in this Transition Plan beginning in 2019. Updates to the appendices or attachments may be made more frequently as needed. Any substantive updates to the main body of this document will be coordinated with the CBJ, and will include public comments opportunities.

JNU recognizes that ADA compliance is an ongoing responsibility that requires monitoring to identify accessibility issues that may be encountered. Therefore, the ADA Title II Coordinator and Transition Plan Implementation Coordinator will establish an on-going monitoring and inspection program to ensure that facilities continue to comply with ADA requirements. CBJ employees will also be encouraged to report any accessibility concerns or deficiencies that are identified.

## Adoption of ADA Transition Plan

This ADA Transition Plan is hereby adopted, effective February of 2020.

Signed:

  
 \_\_\_\_\_ 8-18-2020  
 Mila Cosgrove, Deputy City Manager      Date  
 ADA Title II Coordinator

  
 \_\_\_\_\_ 8/19/2020  
 Patricia K. Wahto, Airport Manager      Date  
 ADA Transition Plan Implementation Coordinator

## **Appendix A**

### **Compliance Templates and Checklists**

**APPENDIX A to**  
JNU ADA Transition Plan

**Title VI**  
**Mini-Review Checklist**  
**2016 version**



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

*Office of Civil Rights*

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|                | ITEM   | YES/NO | COMMENTS |
|----------------|--|--------|----------|
| <b>GENERAL</b> |  |        |          |
| 1              | Is there a Title VI Coordinator?   |        |          |
| 1a             | If so, provide the name and contact information.   | N/A    |          |
| 1b             | If not, who should be contacted regarding Title VI?  |        |          |
| 2              | Is a copy of 49 CFR Part 21 available to the public?   |        |          |
| 2a             | If so, where and how (electronic, paper)?  | N/A    |          |
| 2b             | During what hours is it available?   | N/A    |          |
| 3              | Has the airport received any Title VI complaints within the past three years?  |        |          |
| 3a             | If yes, did they forward them to the FAA, within 15 days of receipt, with a copy of each written Title VI complaint and the actions taken regarding the complaint? | N/A    |          |
| 3b             | If no, do they know the requirement to forward the complaints to the FAA within 15 days of receipt?<br><i>* Obtain a copy of any not forwarded</i>                 |        |          |
| 4              | Does the airport have Title VI complaint procedures?   |        |          |
| 4a             | If yes, are they on the airport website?<br><i>* Obtain a copy</i>   |        |          |
| 5              | Does the airport have a Title VI complaint form?   |        |          |
| 5a             | If yes, is it on the airport website?<br><i>* Obtain a copy</i>  |        |          |
| 6              | Has the airport informed tenants to notify the airport if they receive a Title VI complaint?   |        |          |
| 6a             | If yes, how?   | N/A    |          |
| 6b             | If not, do they have plans to?   |        |          |
| 7              | Does the airport provide Title VI training to airport employees?   |        |          |
| 7a             | If yes, when / how often? (Annually, upon hire only, when badged, etc.)<br><i>* Obtain a copy of the training materials (if any)</i>                               | N/A    |          |
| 7b             | If no, do they have plans to?  |        |          |
| 8              | Does the airport provide Title VI training to tenant employees?  |        |          |
| 8a             | If yes, when / how often? (Annually, upon hire only, when badged, etc.)<br><i>* Obtain a copy of the training materials (if any)</i>                               | N/A    |          |
| 8b             | If no, do they have plans to?  |        |          |
| 9              | Does the airport provide Title VI materials to tenants, e.g., binder with Title VI information?<br><i>* Obtain a copy of Title VI materials (if any)</i>           |        |          |
| 10             | Does the airport conduct outreach in the minority- and/or women-owned business community to advise them of the business opportunities offered by the airport?      |        |          |

|                                       | ITEM  | YES/NO | COMMENTS |
|---------------------------------------|---|--------|----------|
| <b>GENERAL (CONTINUED)</b>            |   |        |          |
| 11                                    | Is public transportation (bus, train, etc.) available at the airport?   |        |          |
| 11a                                   | If yes, is it accessible to those in disadvantaged areas?   |        |          |
| 12                                    | Are resources currently in place to provide meaningful access for LEP individuals?  |        |          |
| 12a                                   | If yes, what resources does the airport have?   | N/A    |          |
| 12b                                   | If yes, has the airport informed tenants what resources are available?  |        |          |
| 13                                    | Does the airport have an LEP Plan?  |        |          |
| 13a                                   | If yes, is it on the airport website?<br><i>* Obtain a copy</i>   |        |          |
| 14                                    | Does the airport Emergency Plan identify how LEP individuals/populations will be assisted in an emergency?  |        |          |
| 14a                                   | If so, in general how is the information included? (e.g., are they included with other special needs individuals, mentioned separately, etc.)<br><i>* Obtain a copy of pages that identify LEP individuals and/or non-English speakers</i>  | N/A    |          |
| <b>CONTRACT REVIEW</b>                |   |        |          |
| 15                                    | Is there a Title VI clause in <u>all</u> contractual agreements (regardless of funding source)? (see the <a href="#">Required Contract Provisions for Airport Improvement Program and for Obligated Sponsors</a> document)<br><i>* Obtain samples of the language if it doesn't match what's in the referenced document</i> |        |          |
| 16                                    | Is the required Title VI solicitation language included in bids for solicitation? (see above referenced document)   |        |          |
| 16a                                   | If no, does the airport include anything about Title VI in the bids for solicitation?<br><i>* Obtain a solicitation for a sample of the language</i>  |        |          |
| 17                                    | Does the airport have a method for monitoring and ensuring that primary contractors have included Title VI requirements in their subcontracts?  |        |          |
| 17a                                   | If yes, what do they do?<br><i>* Obtain a copy their procedures (if available and applicable)</i>   | N/A    |          |
| <b>TOUR (FACILITIES WALK-THROUGH)</b> |   |        |          |
| 18                                    | Is the "Unlawful Discrimination" poster conspicuously displayed in the main public area(s) of the airport? Including pre-/post-security. (e.g., information booths, food court, baggage area, fixed base operator facility, rental car center, hotel on airport property, etc.)   |        |          |
| 18a                                   | If so, where?   | N/A    |          |
| 18b                                   | Do they look like the sample?   |        |          |

|   | ITEM   | YES/NO | COMMENTS |
|---|--|--------|----------|
| <b>TOUR (FACILITIES WALK-THROUGH) (CONTINUED)</b>   |  |        |          |
| 19  | Is any signage in a language other than English? (e.g., directional, emergency exits, etc.)  |        |          |
| 19a   | If so, where and what language(s)?   | N/A    |          |
| 20  | Are there volunteers and/or customer service personnel that interact with the public?  |        |          |
| 20a   | If so, where are they located and when are they present?   | N/A    |          |
| 20b   | If so, do they wear name tags that identify if they speak another language (e.g., with the language itself listed or the country's flag)?  |        |          |
| 20c   | If so, do they know how to assist an LEP individual?<br><i>Ask them to show you or explain how.</i>  |        |          |
| 21  | Are there any announcements, in a language other than English, especially in the international terminal?   |        |          |
| 21a   | If so, what language(s)?   | N/A    |          |
| <b>DOCUMENTS (SUMMARY OF THOSE REQUESTED ABOVE)</b> |  |        |          |
| 22  | Copy of any Title VI complaints received in the past three years not forwarded to the FAA (item 3)   |        |          |
| 23  | Copy of Title VI complaint procedures (item 4)   |        |          |
| 24  | Copy of Title VI complaint form (item 5)   |        |          |
| 25  | Copy of Title VI training materials for training airport employees (item 7)  |        |          |
| 26  | Copy of Title VI training materials for training tenant employees (item 8)   |        |          |
| 27  | Copy of Title VI materials provided to tenants (item 9)  |        |          |
| 28  | Copy of LEP Plan, procedures (item 13)   |        |          |
| 29  | Copy of Airport Emergency Plan pages that identify LEP individuals and/or non-English speakers (item 14)   |        |          |
| 30  | Obtain samples of the contractual agreement language if it doesn't match what's in the referenced document (item 15)   |        |          |
| 31  | Obtain a solicitation for a sample of the language (item 16)   |        |          |
| 32  | Obtain a copy their procedures for ensuring subcontracts have the nondiscrimination clauses (if available and applicable) (item 17)  |        |          |
| <b>DOCUMENTS (OTHERS REQUESTING COPIES OF)</b>      |  |        |          |
| 33  | Airport organization chart identifying by name, title and position, the key individual responsible for administering the Title VI program at the airport. Also, identifying the environmental manager (responsible for environmental justice) and the customer service manager |        |          |
| 34  | Copy of Title VI Plan  |        |          |
| 35  | Copy of the ground transportation rules and regulations  |        |          |

**APPENDIX A to  
JNU ADA Transition Plan**

**ADA  
Mini-Review Checklist  
20XX**



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of Transportation  
**Federal Aviation  
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## Section 1: ADA/504 Mini-Review Checklist

|  | ITEM   | YES/<br>NO/<br>PART | COMMENTS |
|--|--|---------------------|----------|
| <b>A GENERAL (CAN BE OBTAINED PRIOR TO REVIEW)</b> |  |                     |          |
| 1  | Is there an ADA/Section 504 Coordinator? (28 CFR § 35.107; 49 CFR § 27.13)   |                     |          |
| a  | If so, is the contact information on the airport website?  |                     |          |
| b  | If so, provide the name and contact information (email address).   |                     |          |
| 2  | Has the Airport received any ADA/504 complaints within the past five years? (§ 35.107; §§ 27.13 and 27.121)  |                     |          |
| 3  | Does the airport have adopted and published procedures for receiving and handling complaints?  |                     |          |
| 4  | When was the last self-assessment for ADA/504 compliance conducted? (§ 35.105; § 27.11)  |                     |          |
| 5  | Does the Airport Emergency Plan explicitly identify how PWD will be assisted in an emergency?  |                     |          |
| <b>B</b>   |  |                     |          |
| 6  | Is there a clause in <u>all</u> contractual agreements (regardless of funding source) mandating compliance with ADA <u>and</u> Sec. 504 requirements? (see example language) (§ 35.130; § 27.7).<br>Note: The ADCP team usually reviews the following types of contracts: airline, concessionaire, ground transportation, and professional services contracts (prime and sub). |                     |          |
| a  | Does it include a reverter or cancellation clause?   |                     |          |
| b  | Do Airport agreements with air carriers assign responsibility for providing boarding/deplaning assistance? (14 CFR § 382.99)   |                     |          |
| c  | Do Airport agreements with air carriers assign responsibility for maintaining boarding equipment?  |                     |          |
| d  | Do Airport agreements with private ground transportation providers require that the providers have accessible vehicles available as needed?  |                     |          |
| <b>C</b>   |  |                     |          |
| 7  | Is the "Unlawful Discrimination" poster conspicuously displayed in the main public area(s) of the Airport? (e.g., information booths, food courts, baggage area, fixed base operator facility, rental car center, etc.) (49 CFR § 21.9). It should look like the sample.   |                     |          |
| 8  | Is CC turned on for all audio/visual displays, where the devices have CC capability? (§ 27.71)   |                     |          |
| 9  | Are TTY/TDD's provided?  |                     |          |



| <b>C TOUR (FACILITIES WALKTHROUGH, <i>CONTINUED</i>)</b> |   |  |  |
|--|---|--|--|
| 10   | Is signage positioned properly, with required symbols and finish?   |  |  |
| a  | Accessible Parking Signs  |  |  |
| b  | TTY/TDD Signs   |  |  |
| c  | Room Entryway Signs   |  |  |
| d  | SARA Signs  |  |  |
| 11   | Do food, retail service, and airline ticketing / service counters include an accessible section?  |  |  |
| 12   | Is there an accessible path of travel throughout the terminal area?   |  |  |
| a  | Is it free of protruding objects?   |  |  |
| b  | Is there a reasonable path that avoids revolving doors?   |  |  |
| c  | Are doorway openings $\geq 32''$ wide?  |  |  |
| d  | Do doors require $\leq 8$ LB of force to open?  |  |  |
| 13   | For elevators, are requirements met for braille characters, raised call buttons, door, car controls, and car size? Are the elevators working? |  |  |
| 14   | Bathrooms accessibility   |  |  |
| a  | Is at least one accessible toilet stall provided?   |  |  |
| b  | Are sink pipes covered?   |  |  |
| 15   | For parking, are required accessible spaces provided?   |  |  |
| 16   | For Loading/Unloading Zones, are required access aisle and curb ramp provided?  |  |  |
| 17   | Is a SARA located post-security, in every terminal?   |  |  |

## Airport Nondiscrimination Compliance Program (Title VI) Self-Assessment

|   | REFERENCES                           | QUESTIONS  | YES/NO |
|---|--------------------------------------|--|--------|
| <b>APPLICATION</b>  |                                      |  |        |
| 1   | 49 CFR 21.3                          | Does the Airport receive Federal Financial Assistance from the FAA or any other Federal agency?  |        |
| <b>ADMINISTRATIVE</b>   |                                      |  |        |
| 2   | 49 CFR Part 21, Appendix C(b)(2)     | Does the Airport have a copy of 49 CFR Part 21 available for inspection during normal business hours by any person requesting it? (In the Airport administration office in the terminal/offsite; hardcopy or online.)  |        |
| <b>COMPLIANCE</b>   |                                      |  |        |
| 3   | 49 CFR 21.5(b)(7)                    | Has the Airport taken affirmative action(s) to remove the effects of <b>prior</b> discriminatory practices?  |        |
| 4   | 49 CFR 21.5(b)(7)                    | Has the Airport taken affirmative action measures to prevent <b>future</b> discriminatory practices?   |        |
| 5   | 49 CFR 21.5(c)(1)                    | Does the Airport take affirmative action to ensure that applicants are employed, and employees are treated during employment, without regard to their race, color, or national origin?   |        |
| 6   | 49 CFR 21.9(b)                       | Does the Airport maintain records and collect data necessary to permit accurate reporting of their compliance? (e.g., information that supports the Airport's ability to demonstrate a robust Title VI program, such as US Census data for surrounding areas, knowing who uses or may use the Airport, etc.)   |        |
| 7   | 49 CFR 21.9(d)                       | Does the Airport display the "Unlawful Discrimination" poster conspicuously in the main public area or areas of the Airport? (e.g., information booths, food courts, waiting areas, baggage area, and fixed base operator facility, etc.) (A copy of the sample poster can be found at <a href="http://www.faa.gov">www.faa.gov</a> by searching the term "Unlawful Discrimination poster.") |        |
| 8   | 49 CFR 21.9(d)                       | Does the Airport use other ways to inform the flying public of their Title VI rights? (e.g., placing the poster on the Airport website, informing Airport employees, airlines, concessionaires, etc.)  |        |
| <b>OUTREACH</b>   |                                      |  |        |
| 9   | 49 CFR Part 21, Appendix C(a)(1)(x)  | Does the Airport conduct outreach in the minority- and/or women-owned business community to advise them of the opportunities offered by Airport concessions, and that bids are solicited from such qualified minority firms?   |        |
| <b>EMPLOYMENT</b>   |                                      |  |        |
| 10  | 49 CFR Part 21, Appendix C(a)(1)(ix) | Is public transportation (bus, train, etc.) available at the Airport?  |        |
| 10a   |                                      | If yes, Does the Airport coordinate with the local transit authority and the Federal Transit Administration, to assure public transportation, is convenient to the disadvantaged areas of nearby communities to enhance employment opportunities?  |        |
| <b>THIRD PARTY</b>  |                                      |  |        |
| <b>(Also see: Required Contract Provision for AIP and for Obligated Sponsors, Airport Sponsor Grant Assurances particularly, grant assurance #30)</b> |                                      |  |        |
| 11  | 49 CFR Part 21, Appendix C(b)(1)     | Does the Airport have the appropriate clause in each <b>AIP funded</b> contractual agreement (e.g. lease, contract, permit, deeds, subcontracts, etc.) between the Airport and any entity that provides any activity, service, or facility at the Airport?   |        |
| 12  | 49 CFR Part 21, Appendix C(b)(1)     | Does the Airport have the appropriate clause in each <b>non-AIP funded</b> contractual agreement (e.g. lease, contract, permit, deeds, subcontracts, etc.) between the Airport and any entity that provides any activity, service, or facility at the Airport?   |        |
| 13  | 49 CFR Part 21, Appendix C(b)(1)     | Does the Airport have a method for monitoring and ensuring that primary contractors have included Title VI requirements in their subcontracts?   |        |
| <b>COMPLAINTS</b>   |                                      |  |        |
| 14  | 49 CFR Part 21, Appendix C(b)(3)     | Has the Airport received any Title VI complaints within the past three years?  |        |
| 14a   |                                      | If yes, Did the Airport forward to the FAA, within 15 days after receipt, a copy of each written Title VI complaint and the actions taken regarding the complaint?   |        |
| 15  | 49 CFR Part 21, Appendix C(b)(3)     | Does the Airport have Title VI complaint procedures?   |        |
| 15a   |                                      | If yes, Are they available to the public at the information booth, in the Administrative Office, and/or on the Airport website?  |        |
| 16  | 49 CFR 21.9(b)                       | As part of the complaint procedures, does the airport have a system for collecting complaint information from all Airport employees, airlines, concessionaires, etc.?  |        |
| 16a   |                                      | If yes, Has the Airport communicated the complaint procedures to these entities?   |        |

|  | REFERENCES                             | QUESTIONS   | YES/NO |
|--|--|---|--------|
| <b>COMPLAINTS (CONTINUED)</b>            |  |   |        |
| 17                                       | 49 CFR Part 21, Appendix C(b)(3)       | Does the Airport have a Title VI complaint form?  |        |
| 17a                                      |  | If yes, Is it available to the public at the information booth, in the Administrative Office, and/or on the Airport website?  |        |
| <b>LIMITED ENGLISH PROFICIENCY (LEP)</b> |  |   |        |
| 18                                       | 70 FR 74087; 49 CFR 21.5               | Does the Airport collect data to determine their LEP population using the four factor analysis? The following are the four factors:<br>1. The number or proportion of LEP individuals served or encountered in the Airport's service area<br>2. The frequency of contact between LEP individuals and the Airport's programs, activities or services<br>3. The nature and importance of the program, activity, or service provided by the Airport<br>4. The resources available to the Airport and related costs   |        |
| 19                                       | 70 FR 74087; 49 CFR 21.5               | Does the Airport use any additional process(s) for determining their LEP population? (e.g., surveying travelers, collecting and recording language assistance requests, etc.)   |        |
| 20                                       | 70 FR 74087; 49 CFR 21.5               | Has the Airport checked with Airport employees, airlines, concessionaires, etc., to learn what languages, other than English, they encounter?   |        |
| 21                                       | 49 CFR 21.5                            | Based on the results of the four factor analysis, does the Airport analyze their programs and services to determine the need for language assistance for LEP individuals?   |        |
| 22                                       | 49 CFR 21.5                            | Are resources currently in place to provide meaningful access for LEP individuals?  |        |
| 23                                       | 49 CFR 21.5                            | Does the Airport have an LEP plan? The following are the five elements of an LEP Plan:<br>1. Identification of LEP individuals (first two factors of the four factor analysis)<br>2. Language assistance measures (services available)<br>3. Staff training (training staff on the LEP Plan, their role and responsibilities)<br>4. Provide notice (informing LEP individuals, as appropriate in languages other than English, of the availability of language assistance services)<br>5. Monitoring and updating (how the LEP Plan will be kept current) |        |
| 23a                                      | 49 CFR 21.5                            | If no, Does the Airport inform LEP individuals of the availability of language assistance services? (e.g., conduct outreach to LEP communities regarding language assistance services, signage to direct LEP persons to sources of assistance, etc.)  |        |
| 24                                       | AC 150/5200-31C                        | Does the Airport Emergency Plan identify how LEP individuals/populations will be assisted in an emergency?  |        |
| 24a                                      |  | If yes, Are they included with other special needs individuals, mentioned separately, etc.?   |        |
| <b>ENVIRONMENTAL JUSTICE (EJ)</b>        |  |   |        |
| 25                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Does the Airport have an effective public communication plan to enable involvement of minority and/or low income populations in the decision making process for potential airport projects, and for ongoing EJ concerns?  |        |
| 26                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Does the Airport maintain records and collect data necessary to understand the racial and ethnic composition of the surrounding communities in order to determine if projects may have EJ impacts? (e.g., information that supports the Airport's ability to demonstrate their knowledge of the communities near the airport, such as the National Environmental Policy Act (NEPA) data, etc.)  |        |
| 27                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Within the past three years, has any Airport project or potential project had an EJ impact on minority and/or low income communities?   |        |
| 28                                       | 49 CFR Part 21, Appendix C(a)(1)(ix)   | Is the Airport EJ point of contact, aware of the Airport's responsibility pertaining to the Title VI and EJ Pre-Grant Award requirements?   |        |
| 29                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Has the Airport conducted a 14 CFR Part 150 Study within the past five years?   |        |
| 30                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Has the Airport received a grant for noise mitigation purposes within the past three years?   |        |

**Airport Nondiscrimination Compliance Program Team**

Federal Aviation Administration  
Office of Civil Rights, ATTN: ANCP  
1 Aviation Plaza, Jamaica, NY 11434

Phone: 718-553-3295



Federal Aviation Administration



## **Appendix B**

### **2017 FAA Audit/Findings and JNU Compliance**

# **Title VI**

# **Mini-Review Checklist**

## **2016 version**



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

*Office of Civil Rights*

ACHIEVING SAFETY  
THROUGH DIVERSITY

|                | ITEM   | YES/NO       | COMMENTS   |
|----------------|--|--------------|--|
| <b>GENERAL</b> |  |              |  |
| 1              | Is there a Title VI Coordinator?   | Y            |  |
| 1a             | If so, provide the name and contact information.   |              | CBJ Deputy City Manager  |
| 1b             | If not, who should be contacted regarding Title VI?  | File through | Airport Manager (for Airport)  |
| 2              | Is a copy of 49 CFR Part 21 available to the public?   | Y            |  |
| 2a             | If so, where and how (electronic, paper)?  |              | Paper (Airport Admin.)/ Airport Website  |
| 2b             | During what hours is it available?   |              | Paper M-F 8-4:30 / Website 24/7  |
| 3              | Has the airport received any Title VI complaints within the past three years?  | N            |  |
| 3a             | If yes, did they forward them to the FAA, within 15 days of receipt, with a copy of each written Title VI complaint and the actions taken regarding the complaint? | ---          |  |
| 3b             | If no, do they know the requirement to forward the complaints to the FAA within 15 days of receipt?<br><i>* Obtain a copy of any not forwarded</i>                 | Y            | Also in complaint instructions   |
| 4              | Does the airport have Title VI complaint procedures?   | Y            |  |
| 4a             | If yes, are they on the airport website?<br><i>* Obtain a copy</i>   | Y            | <a href="http://www.juneau.org/airport/ps_titleVI.php">http://www.juneau.org/airport/ps_titleVI.php</a>                      |
| 5              | Does the airport have a Title VI complaint form?   | Y            |  |
| 5a             | If yes, is it on the airport website? <i>* Obtain a copy</i>   | Y            |  |
| 6              | Has the airport informed tenants to notify the airport if they receive a Title VI complaint?   | Y            |  |
| 6a             | If yes, how?   |              | Email to commercial tenants  |
| 6b             | If not, do they have plans to?   |              |  |
| 7              | Does the airport provide Title VI training to airport employees?   | Y            | Through CBJ initial employment   |
| 7a             | If yes, when / how often? (Annually, upon hire only, when badged, etc.)<br><i>* Obtain a copy of the training materials (if any)</i>                               | Upon hire    | New Employee Orientation, upon hire (pg 67-69 of NEO training PPT)   |
| 7b             | If no, do they have plans to?  |              |  |
| 8              | Does the airport provide Title VI training to tenant employees?  | N            |  |
| 8a             | If yes, when / how often? (Annually, upon hire only, when badged, etc.)<br><i>* Obtain a copy of the training materials (if any)</i>                               |              |  |
| 8b             | If no, do they have plans to?  | N            | Part of commercial lease obligations   |
| 9              | Does the airport provide Title VI materials to tenants, e.g., binder with Title VI information?<br><i>* Obtain a copy of Title VI materials (if any)</i>           | N            |  |
| 10             | Does the airport conduct outreach in the minority- and/or women-owned business community to advise them of the business opportunities offered by the airport?      |              | Through ACDBE program procurement  |
| 11             | Is public transportation (bus, train, etc.) available at the airport?  | Y            | Bus – Capital Transit<br><a href="https://juneaucapitaltransit.org/title-vi/">https://juneaucapitaltransit.org/title-vi/</a> |
| 11a            | If yes, is it accessible to those in disadvantaged areas?  | N/A          | City-wide bus system   |



|                                       | ITEM  | YES/NO | COMMENTS  |
|---------------------------------------|---|--------|---|
| <b>GENERAL (CONTINUED)</b>            |   |        |   |
| 12                                    | Are resources currently in place to provide meaningful access for LEP individuals?  |        | See email – Travel Juneau volunteers<br>Also computer translation   |
| 12a                                   | If yes, what resources does the airport have?   |        |   |
| 12b                                   | If yes, has the airport informed tenants what resources are available?  | N      |   |
| 13                                    | Does the airport have an LEP Plan?  | N      |   |
| 13a                                   | If yes, is it on the airport website?<br><i>* Obtain a copy</i>   |        | In progress   |
| 14                                    | Does the airport Emergency Plan identify how LEP individuals/populations will be assisted in an emergency?  | N      |   |
| 14a                                   | If so, in general how is the information included? (e.g., are they included with other special needs individuals, mentioned separately, etc.)<br><i>* Obtain a copy of pages that identify LEP individuals and/or non-English speakers</i>  |        | ADA plans, otherwise LEP and hearing impaired are part of the 'sweep' completed by airport personnel and fire department              |
| <b>CONTRACT REVIEW</b>                |   |        |   |
| 15                                    | Is there a Title VI clause in <u>all</u> contractual agreements (regardless of funding source)? (see the <a href="#">Required Contract Provisions for Airport Improvement Program and for Obligated Sponsors</a> document)<br><i>* Obtain samples of the language if it doesn't match what's in the referenced document</i> | Y*     | *Sections on non-discrimination (not necessarily titled Title VI)   |
| 16                                    | Is the required Title VI solicitation language included in bids for solicitation? (see above referenced document)   | Y      |   |
| 16a                                   | If no, does the airport include anything about Title VI in the bids for solicitation?<br><i>* Obtain a solicitation for a sample of the language</i>  |        |   |
| 17                                    | Does the airport have a method for monitoring and ensuring that primary contractors have included Title VI requirements in their subcontracts?  | Y      | In bid documents  |
| 17a                                   | If yes, what do they do?<br><i>* Obtain a copy their procedures (if available and applicable)</i>   |        | In bid documents  |
| <b>TOUR (FACILITIES WALK-THROUGH)</b> |   |        |   |
| 18                                    | Is the "Unlawful Discrimination" poster conspicuously displayed in the main public area(s) of the airport? Including pre-/post-security. (e.g., information booths, food court, baggage area, fixed base operator facility, rental car center, hotel on airport property, etc.)   | Y      | Airline check-in, baggage claim, visitors booth, departure lounge, restaurant, FBO  |
| 18a                                   | If so, where?   |        | above   |
| 18b                                   | Do they look like the sample?   | Y      | <a href="http://www.juneau.org/airport/documents/title_vi_poster.pdf">http://www.juneau.org/airport/documents/title_vi_poster.pdf</a> |
| 19                                    | Is any signage in a language other than English? (e.g., directional, emergency exits, etc.)   | Y      | Some universal symbols (restrooms)  |
| 19a                                   | If so, where and what language(s)?  |        | Some universal symbols  |



|   | ITEM   | YES/NO | COMMENTS  |
|---|--|--------|---|
| <b>TOUR (FACILITIES WALK-THROUGH) (CONTINUED)</b>   |  |        |   |
| 20  | Are there volunteers and/or customer service personnel that interact with the public?  | Y      |   |
| 20a   | If so, where are they located and when are they present?   |        | Travel Juneau (formerly Juneau Convention/Visitor Bureau) during peak flight times (volunteers) near bag claim – see email- |
| 20b   | If so, do they wear name tags that identify if they speak another language (e.g., with the language itself listed or the country's flag)?  | N      |   |
| 20c   | If so, do they know how to assist an LEP individual?<br><i>Ask them to show you or explain how.</i>  | Y      | See email- Travel Juneau  |
| 21  | Are there any announcements, in a language other than English, especially in the international terminal?   | N      | No international terminal (only customs)  |
| 21a   | If so, what language(s)?   |        |   |
| <b>DOCUMENTS (SUMMARY OF THOSE REQUESTED ABOVE)</b> |  |        |   |
| 22  | Copy of any Title VI complaints received in the past three years not forwarded to the FAA (item 3)   | N/A    |   |
| 23  | Copy of Title VI complaint procedures (item 4)   |        | <a href="http://www.juneau.org/airport/ps_titleVI.php">http://www.juneau.org/airport/ps_titleVI.php</a>                     |
| 24  | Copy of Title VI complaint form (item 5)   |        | <a href="http://www.juneau.org/airport/ps_titleVI.php">http://www.juneau.org/airport/ps_titleVI.php</a>                     |
| 25  | Copy of Title VI training materials for training airport employees (item 7)  |        | Attached  |
| 26  | Copy of Title VI training materials for training tenant employees (item 8)   | N      |   |
| 27  | Copy of Title VI materials provided to tenants (item 9)  | N      |   |
| 28  | Copy of LEP Plan, procedures (item 13)   | N      | In progress   |
| 29  | Copy of Airport Emergency Plan pages that identify LEP individuals and/or non-English speakers (item 14)   |        | Have emergency plan but no LEP procedures   |
| 30  | Obtain samples of the contractual agreement language if it doesn't match what's in the referenced document (item 15)   |        |   |
| 31  | Obtain a solicitation for a sample of the language (item 16)   |        |   |
| 32  | Obtain a copy their procedures for ensuring subcontracts have the nondiscrimination clauses (if available and applicable) (item 17)  |        |   |
| <b>DOCUMENTS (OTHERS REQUESTING COPIES OF)</b>      |  |        |   |
| 33  | Airport organization chart identifying by name, title and position, the key individual responsible for administering the Title VI program at the airport. Also, identifying the environmental manager (responsible for environmental justice) and the customer service manager |        | attached  |
| 34  | Copy of Title VI Plan  |        | <a href="http://www.juneau.org/airport/ps_titleVI.php">http://www.juneau.org/airport/ps_titleVI.php</a>                     |
| 35  | Copy of the ground transportation rules and regulations  | N      |   |

JNU – Title VI Compliance Mini Review

Review Findings Matrix - Response

| Topic and Location                   | Checklist Item Number | Compliance Status  | Regulation  | Corrective Action  | Proposed date of compliance | Actual date of compliance  |
|--------------------------------------|-----------------------|--|---|--|-----------------------------|--|
| 1. Limited English Proficiency (LEP) | 12, 13                | The Authority has not conducted a Four-Factor Analysis and determined what language assistance services are appropriate. | Executive Order 13166;<br>65 FR 50123;<br>Appendix C to Part 21, Sect. (a)(1)(ii) | <b>Recommendation:</b> Conduct a Four-Factor Analysis and develop an LEP plan to address the identified needs of LEP persons. Evaluate whether additional signage in other languages, and additional language resources, are advisable or necessary, as part of the LEP plan.<br><br><b>Actual:</b>  |                             | In compliance May 1, 2019. LEP plan in place and posted on line; disseminated to stakeholders. No changes to current practice based on US Census data. |
| 2. Airport Emergency Plan (AEP)      | 14                    | The Airport Emergency Plan does not fully address how they will assist an LEP individual.                                | AC 150/5200-31C   | <b>Recommendation:</b> Update Airport Emergency Plan and/or related procedures to identify how LEP individuals will be assisted in an emergency.<br><br>The information can be included in the special needs population discussion if LEP individuals are included in the definition of the special needs population in Chapter 6, Sections 3, 4, and 5.<br><br><b>Actual:</b> |                             | AEP updated May 13, 2019, with references to LEP plan (Chapter 8 of AEP)   |



## Section 1: ADA/504 Mini-Review Checklist

|          | ITEM  | YES/<br>NO/<br>PART | COMMENTS   |
|----------|---|---------------------|--|
| <b>A</b> | <b>GENERAL (CAN BE OBTAINED PRIOR TO REVIEW)</b>  |                     |  |
| 1        | Is there an ADA/Section 504 Coordinator? (28 CFR § 35.107; 49 CFR § 27.13)  | Y                   | Through the City and Borough of Juneau   |
| a        | If so, is the contact information on the airport website?   | Y                   | <a href="https://beta.juneau.org/manager/ada-information">https://beta.juneau.org/manager/ada-information</a>  |
| b        | If so, provide the name and contact information (email address).  |                     | Mila Cosgrove <a href="mailto:Mila.Cosgrove@juneau.org">Mila.Cosgrove@juneau.org</a>   |
| 2        | Has the Airport received any ADA/504 complaints within the past five years? (§ 35.107; §§ 27.13 and 27.121)   | N                   |  |
| 3        | Does the airport have adopted and published procedures for receiving and handling complaints?   | Y                   | Website both CBJ and Airport specific  |
| 4        | When was the last self-assessment for ADA/504 compliance conducted? (§ 35.105; § 27.11)   |                     | Ongoing, ADA not specific to 504   |
| 5        | Does the Airport Emergency Plan explicitly identify how PWD will be assisted in an emergency?   |                     | Updating plan, was not specific  |
| <b>B</b> | <b>CONTRACT REVIEW</b>  |                     |  |
| 6        | Is there a clause in <u>all</u> contractual agreements (regardless of funding source) mandating compliance with ADA and Sec. 504 requirements? (see example language) (§ 35.130; § 27.7).<br>Note: The ADCP team usually reviews the following types of contracts: airline, concessionaire, ground transportation, and professional services contracts (prime and sub). | *Y                  | <ul style="list-style-type: none"> <li>Not specific to (new) 504, but yes to ADA language in contracts, bids, airline agreements, concessionaire contracts, no contracts with ground transportation</li> </ul> |
| a        | Does it include a reverter or cancellation clause?  | Y                   |  |
| b        | Do Airport agreements with air carriers assign responsibility for providing boarding/deplaning assistance? (14 CFR § 382.99)  | N                   |  |
| c        | Do Airport agreements with air carriers assign responsibility for maintaining boarding equipment?   |                     | Separate agreements for use of airport owned jetbridge and ADA ramp (these are separate from the operating agreements with airlines)   |
| d        | Do Airport agreements with private ground transportation providers require that the providers have accessible vehicles available as needed?   | NA                  |  |
| <b>C</b> | <b>TOUR (FACILITIES WALKTHROUGH)</b>  |                     |  |
| 7        | Is the "Unlawful Discrimination" poster conspicuously displayed in the main public area(s) of the Airport? (e.g., information booths, food courts, baggage area, fixed base operator facility, rental car center, etc.) (49 CFR § 21.9). It should look like the sample.  | Y                   |  |
| 8        | Is CC turned on for all audio/visual displays, where the devices have CC capability? (§ 27.71)  |                     | FIDS displayed, TVs as needed, if available.   |
| 9        | Are TTY/TDD's provided?   | Y                   | TDD phone located in bag claim area 1 <sup>st</sup> floor  |

| <b>C TOUR (FACILITIES WALKTHROUGH, CONTINUED)</b> |   |      |  |
|---|---|------|--|
| 10  | Is signage positioned properly, with required symbols and finish?   | *    | Checking newer code height and direct v side approach  |
| a   | Accessible Parking Signs  | Y    | ADA markings and signs in public parking   |
| b   | TTY/TDD Signs   | N    | Not at this time   |
| c   | Room Entryway Signs   | some | Public ones (restrooms)  |
| d   | SARA Signs  | Y    | For lower level outside/non-secured area   |
| 11  | Do food, retail service, and airline ticketing / service counters include an accessible section?  | Y    |  |
| 12  | Is there an accessible path of travel throughout the terminal area?   | Y    |  |
| a   | Is it free of protruding objects?   | Y    |  |
| b   | Is there a reasonable path that avoids revolving doors?   | Y    |  |
| c   | Are doorway openings $\geq 32$ " wide?  | Y    |  |
| d   | Do doors require $\leq 8$ LB of force to open?  | Y    |  |
| 13  | For elevators, are requirements met for braille characters, raised call buttons, door, car controls, and car size? Are the elevators working? | Y    | Outside (1 <sup>st</sup> /2 <sup>nd</sup> floor) single up or down not brail, inside raised character, call, emergency raised buttons. Y working and serviced regularly via contract |
| 14  | Bathrooms accessibility   |      |  |
| a   | Is at least one accessible toilet stall provided?   | Y    |  |
| b   | Are sink pipes covered?   | *Y   | General-do not protrude (under counter), Family/ADA bathroom - covered   |
| 15  | For parking, are required accessible spaces provided?   | Y    | ST 3/65, LT 7/217  |
| 16  | For Loading/Unloading Zones, are required access aisle and curb ramp provided?  | Y    |  |
| 17  | Is a SARA located post-security, in every terminal?   | N    | Space constraints/outside security lower level north end   |



# JNU Airport Nondiscrimination Compliance Program (Title VI) Self-Assessment

August 2017

| REFERENCES  |                                      | QUESTIONS  | YES/NO   |
|---|--------------------------------------|--|--|
| <b>APPLICATION</b>  |                                      |  |  |
| 1   | 49 CFR 21.3                          | Does the Airport receive Federal Financial Assistance from the FAA or any other Federal agency?  | Y  |
| <b>ADMINISTRATIVE</b>   |                                      |  |  |
| 2   | 49 CFR Part 21, Appendix C(b)(2)     | Does the Airport have a copy of 49 CFR Part 21 available for inspection during normal business hours by any person requesting it? (In the Airport administration office in the terminal/offsite; hardcopy or online.)  | Y  |
| <b>COMPLIANCE</b>   |                                      |  |  |
| 3   | 49 CFR 21.5(b)(7)                    | Has the Airport taken affirmative action(s) to remove the effects of <b>prior</b> discriminatory practices?  | N/A  |
| 4   | 49 CFR 21.5(b)(7)                    | Has the Airport taken affirmative action measures to prevent <b>future</b> discriminatory practices?   | Y  |
| 5   | 49 CFR 21.5(c)(1)                    | Does the Airport take affirmative action to ensure that applicants are employed, and employees are treated during employment, without regard to their race, color, or national origin?   | Y  |
| 6   | 49 CFR 21.9(b)                       | Does the Airport maintain records and collect data necessary to permit accurate reporting of their compliance? (e.g., information that supports the Airport's ability to demonstrate a robust Title VI program, such as US Census data for surrounding areas, knowing who uses or may use the Airport, etc.)   | Not tracked, periodic economic studies done see 2017 EIS |
| 7   | 49 CFR 21.9(d)                       | Does the Airport display the "Unlawful Discrimination" poster conspicuously in the main public area or areas of the Airport? (e.g., information booths, food courts, waiting areas, baggage area, and fixed base operator facility, etc.) (A copy of the sample poster can be found at <a href="http://www.faa.gov">www.faa.gov</a> by searching the term "Unlawful Discrimination poster.") | Y  |
| 8   | 49 CFR 21.9(d)                       | Does the Airport use other ways to inform the flying public of their Title VI rights? (e.g., placing the poster on the Airport website, informing Airport employees, airlines, concessionaires, etc.)  | Y  |
| <b>OUTREACH</b>   |                                      |  |  |
| 9   | 49 CFR Part 21, Appendix C(a)(1)(x)  | Does the Airport conduct outreach in the minority- and/or women-owned business community to advise them of the opportunities offered by Airport concessions, and that bids are solicited from such qualified minority firms?   | Y CBJ  |
| <b>EMPLOYMENT</b>   |                                      |  |  |
| 10  | 49 CFR Part 21, Appendix C(a)(1)(ix) | Is public transportation (bus, train, etc.) available at the Airport?<br><br><a href="https://juneaucapitaltransit.org/human-services/">https://juneaucapitaltransit.org/human-services/</a>   | Y  |
| 10a   |                                      | If yes, Does the Airport coordinate with the local transit authority and the Federal Transit Administration, to assure public transportation, is convenient to the disadvantaged areas of nearby communities to enhance employment opportunities?  | CBJ Entity   |
| <b>THIRD PARTY</b>  |                                      |  |  |
| <i>(Also see: Required Contract Provision for AIP and for Obligated Sponsors, Airport Sponsor Grant Assurances particularly, grant assurance #30)</i> |                                      |  |  |
| 11  | 49 CFR Part 21, Appendix C(b)(1)     | Does the Airport have the appropriate clause in each <b>AIP funded</b> contractual agreement (e.g. lease, contract, permit, deeds, subcontracts, etc.) between the Airport and any entity that provides any activity, service, or facility at the Airport?   | Y  |
| 12  | 49 CFR Part 21, Appendix C(b)(1)     | Does the Airport have the appropriate clause in each <b>non-AIP funded</b> contractual agreement (e.g. lease, contract, permit, deeds, subcontracts, etc.) between the Airport and any entity that provides any activity, service, or facility at the Airport?   | Y<br>Commercial agreements                               |
| 13  | 49 CFR Part 21, Appendix C(b)(1)     | Does the Airport have a method for monitoring and ensuring that primary contractors have included Title VI requirements in their subcontracts?   | Y  |
| <b>COMPLAINTS</b>   |                                      |  |  |
| 14  | 49 CFR Part 21, Appendix C(b)(3)     | Has the Airport received any Title VI complaints within the past three years?  | N  |
| 14a   |                                      | If yes, Did the Airport forward to the FAA, within 15 days after receipt, a copy of each written Title VI complaint and the actions taken regarding the complaint?   |  |
| 15  | 49 CFR Part 21, Appendix C(b)(3)     | Does the Airport have Title VI complaint procedures?   | Y  |
| 15a   |                                      | If yes, Are they available to the public at the information booth, in the Administrative Office, and/or on the Airport website?  | Y  |
| 16  | 49 CFR 21.9(b)                       | As part of the complaint procedures, does the airport have a system for collecting complaint information from all Airport employees, airlines, concessionaires, etc.?  | Y  |
| 16a   |                                      | If yes, Has the Airport communicated the complaint procedures to these entities?   | Y  |

|  | REFERENCES                             | QUESTIONS   | YES/NO  |
|--|--|---|---|
| <b>COMPLAINTS (CONTINUED)</b>            |  |   |   |
| 17                                       | 49 CFR Part 21, Appendix C(b)(3)       | Does the Airport have a Title VI complaint form?  | Y   |
| 17a                                      |  | If yes, Is it available to the public at the information booth, in the Administrative Office, and/or on the Airport website?  | Y   |
| <b>LIMITED ENGLISH PROFICIENCY (LEP)</b> |  |   |   |
| 18                                       | 70 FR 74087; 49 CFR 21.5               | Does the Airport collect data to determine their LEP population using the four factor analysis? The following are the four factors:<br>1. The number or proportion of LEP individuals served or encountered in the Airport's service area<br>2. The frequency of contact between LEP individuals and the Airport's programs, activities or services<br>3. The nature and importance of the program, activity, or service provided by the Airport<br>4. The resources available to the Airport and related costs   | N<br>not at this time. LEP Plan is in development |
| 19                                       | 70 FR 74087; 49 CFR 21.5               | Does the Airport use any additional process(s) for determining their LEP population? (e.g., surveying travelers, collecting and recording language assistance requests, etc.)   |   |
| 20                                       | 70 FR 74087; 49 CFR 21.5               | Has the Airport checked with Airport employees, airlines, concessionaires, etc., to learn what languages, other than English, they encounter?   | Y<br>but not recorded                             |
| 21                                       | 49 CFR 21.5                            | Based on the results of the four factor analysis, does the Airport analyze their programs and services to determine the need for language assistance for LEP individuals?   |   |
| 22                                       | 49 CFR 21.5                            | Are resources currently in place to provide meaningful access for LEP individuals? computers to translate   |   |
| 23                                       | 49 CFR 21.5                            | Does the Airport have an LEP plan? The following are the five elements of an LEP Plan:<br>1. Identification of LEP individuals (first two factors of the four factor analysis)<br>2. Language assistance measures (services available)<br>3. Staff training (training staff on the LEP Plan, their role and responsibilities)<br>4. Provide notice (informing LEP individuals, as appropriate in languages other than English, of the availability of language assistance services)<br>5. Monitoring and updating (how the LEP Plan will be kept current) | N<br>in progress                                  |
| 23a                                      | 49 CFR 21.5                            | If no, Does the Airport inform LEP individuals of the availability of language assistance services? (e.g., conduct outreach to LEP communities regarding language assistance services, signage to direct LEP persons to sources of assistance, etc.)  |   |
| 24                                       | AC 150/5200-31C                        | Does the Airport Emergency Plan identify how LEP individuals/populations will be assisted in an emergency?  | N   |
| 24a                                      |  | If yes, Are they included with other special needs individuals, mentioned separately, etc.?   |   |
| <b>ENVIRONMENTAL JUSTICE (EJ)</b>        |  |   |   |
| 25                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Does the Airport have an effective public communication plan to enable involvement of minority and/or low income populations in the decision making process for potential airport projects, and for ongoing EJ concerns?  |   |
| 26                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Does the Airport maintain records and collect data necessary to understand the racial and ethnic composition of the surrounding communities in order to determine if projects may have EJ impacts? (e.g., information that supports the Airport's ability to demonstrate their knowledge of the communities near the airport, such as the National Environmental Policy Act (NEPA) data, etc.)  | N   |
| 27                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Within the past three years, has any Airport project or potential project had an EJ impact on minority and/or low income communities?   | N   |
| 28                                       | 49 CFR Part 21, Appendix C(a)(1)(ix)   | Is the Airport EJ point of contact, aware of the Airport's responsibility pertaining to the Title VI and EJ Pre-Grant Award requirements?   |   |
| 29                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Has the Airport conducted a 14 CFR Part 150 Study within the past five years?   | N   |
| 30                                       | 49 CFR Part 21, Appendix C(a)(1)(viii) | Has the Airport received a grant for noise mitigation purposes within the past three years?   | N   |

**Airport Nondiscrimination Compliance Program Team**

Federal Aviation Administration  
Office of Civil Rights, ATTN: ANCP  
1 Aviation Plaza, Jamaica, NY 11434

Phone: 718-553-3295



Federal Aviation  
Administration

**ATTACHMENT B – VOLUNTARY COMPLIANCE AGREEMENT**

|                           |   |  |
|---------------------------|---|--|
| Airport(s)                | Juneau International Airport (JNU)  | <b>APPENDIX B to<br/>JNU ADA Transition Plan</b> |
| Recipient                 | City of Juneau  |  |
| Airport Type              | Primary   |  |
| Airport Representative(s) | Patty Wahto, Airport Manager<br>Marc Cheatham, Deputy Airport Manager<br>Roger Healy, Engineering Director<br>Janet Sanbei, Contract Specialist |  |
| FAA Representative(s)     | Gene Roth, Disadvantaged Business Enterprise Program Team Lead<br>Sonia Cruz, Disadvantaged Business Enterprise Program Team Specialist         |  |
| Date of Mini-Review       | September 13, 2017  |  |



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Civil Rights

777 S. Aviation Blvd., Suite 150  
El Segundo, CA 90245

April 17, 2019

Patty Wahto  
Airport Manager  
Juneau International Airport  
City of Juneau  
155 S. Seward  
Juneau, AK 99801

Re: Juneau International Airport (JNU) – Disability Compliance Mini Review Final Report

Dear Ms. Wahto:

The Federal Aviation Administration (FAA) Office of Civil Rights would like to thank you for participating in the September 2017 review of JNU airport programs, activities, and services to ensure nondiscrimination on the basis of disability. We appreciate the substantial effort taken by your staff in providing the required documentation, meeting with FAA program staff, and providing access to all public areas of your airport.

We apologize for the delay in providing this report.

During the site visit, staff conducted a review for airport disability requirements and evaluated the compliance at the time of the review. The compliance review focused on the following areas:

- ✓ Administrative Requirements
- ✓ Contracts
- ✓ Facility Design

The attached compliance questionnaire (Attachment A) was used to conduct an initial assessment of the airport's compliance with airport disability requirements.

During this review, we found that JNU has accessible standard parking facilities, accessible signage, complaint and reasonable modification/accommodation procedures, and a facility largely free of protruding objects and barriers.

We also identified instances where the airport is not in full compliance. The airport must take corrective actions to comply with the following requirements:

- Require compliance with all applicable airport disability laws in tenant and vendor contracts;
- Maintain all required accessibility features, including restroom elements;
- Add foreseeable needs of people with disabilities to airport emergency plans;
- Add a post-security service animal relief area (SARA); and
- Additional minor issues, as identified in Attachment B.

As discussed during the exit meeting, attached is the voluntary compliance agreement (Attachment B), which we will use to document compliance concerns and proposed dates of compliance. Within 30 days of this letter, please indicate the status of each finding, providing completion dates for corrective actions already implemented and proposed completion dates for the remaining open findings. If necessary, please include a separate letter describing your proposed corrective action plans. Please let us know if you require additional time.

As indicated throughout the compliance review process, the list of findings is not meant to be an all-inclusive list of compliance issues. The findings are a snapshot of the status of your programs, activities, and services, based on our review of select elements, and as identified at the time of the on-site review.

The FAA Office of Civil Rights looks forward to continuing to work with you in ensuring compliance with airport disability requirements. If you have any questions or require additional information, please contact me by phone at (424) 405-7202 or by email at [Jonathan.Klein@FAA.gov](mailto:Jonathan.Klein@FAA.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Klein', with a large, stylized initial 'J'.

Jonathan Klein  
Acting for Michael Freilich  
Director, National External Operations Program  
Office of Civil Rights

Attachments



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Civil Rights

777 S. Aviation Blvd., Suite 150  
El Segundo, CA 90245

April 18, 2019

Patty Wahto  
Airport Manager  
Juneau International Airport  
City of Juneau  
155 S. Seward  
Juneau, AK 99801

Re: Juneau International Airport (JNU) – Title VI Compliance Mini Review Final Report

Dear Ms. Wahto:

The Federal Aviation Administration (FAA) Office of Civil Rights would like to thank you for participating in the September 2017 review of JNU airport programs, activities, and services to ensure compliance with Title VI of the Civil Rights Act of 1964, and related regulations and requirements. We appreciate the substantial effort taken by your staff in providing the required documentation, meeting with FAA program staff, and providing access to all public areas of your airport.

We apologize for the delay in providing this report.

During the site visit, staff conducted a review for airport nondiscrimination requirements and evaluated JNU's compliance status at the time of the review. The compliance review focused on the following areas:

- ✓ Administrative Requirements
- ✓ Contracts
- ✓ Facility Elements

The attached compliance questionnaire (Attachment A) was used to conduct an initial assessment of the airport's compliance with airport nondiscrimination requirements.

During this review, we found that JNU has a designated coordinator for airport nondiscrimination issues, has Title VI complaint procedures, makes a copy of DOT's Title VI regulations available to the public, and posts unlawful discrimination notices at airport public facilities.

We also identified instances where the airport is not in full compliance. The airport must take corrective actions to comply with the following requirements:

- Add foreseeable needs of people with limited English Proficiency (LEP) to airport emergency plans; and
- Conduct a Four-Factor Analysis to determine LEP assistance obligations and incorporate the determinations into an LEP Plan

In addition, once the Four-Factor Analysis is complete, we recommend that the airport authority verify that existing public announcements, language assistance services, translated resources, and other practices are consistent with the conclusions from the analysis. Training for airport staff and tenants may also help to ensure compliance with nondiscrimination requirements.

As discussed during the exit meeting, attached is the voluntary compliance agreement (Attachment B), which we will use to document compliance concerns and proposed dates of compliance. Within 30 days of this letter, please indicate the status of each finding, providing completion dates for corrective actions already implemented and proposed completion dates for the remaining open findings. If necessary, please include a separate letter describing your proposed corrective action plans. Please let us know if you require additional time.

The FAA Office of Civil Rights looks forward to continuing to work with you in ensuring compliance with airport nondiscrimination requirements. If you have any questions or require additional information, please contact me at (424) 405-7202 or by email at [Jonathan.Klein@FAA.gov](mailto:Jonathan.Klein@FAA.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Klein', with a large, stylized initial 'J'.

Jonathan Klein  
Acting for Michael Freilich  
Director, National External Operations Program  
Office of Civil Rights

Attachments





1873 Shell Simmons Drive, Ste. 200, Juneau, Alaska 99801 • (907)789-782 • FAX: (907)789-1227

Jonathan Klein, Acting Director  
National External Operations Program  
Office of Civil Rights  
Federal Aviation Administration  
777 S. Aviation Blvd., Suite 150  
El Segundo, CA 90245

May 13, 2019

RE: Juneau International Airport (JNU) – Title VI Compliance Mini Review Response

**Inspection Date:** September 2017

**Report Date:** April 17, 2019

**Inspection Site:** Juneau International Airport, 1873 Shell Simmons Drive, Juneau, AK 99801

Dear Mr. Klein:

Pursuant to the above referenced inspection, Juneau International Airport (JNU) has completed the compliance corrective action. The Title VI Review findings matrix has been complete and is attached. A copy of our Limited English Proficiency (LEP) plan resulting from the Four-Factor Analysis is also attached.

Please let us know if any further documentation or information is required.

Sincerely,

Patricia K. Wahto  
Airport Manager

Attachments: JNU – Title VI Compliance Mini Review Findings Matrix  
Limited English Proficiency (LEP) Plan

Copy: Mila Cosgrove, Deputy City Manager





1873 Shell Simmons Drive, Ste. 200, Juneau, Alaska 99801 • (907)789-782 • FAX: (907)789-1227

Jonathan Klein, Acting Director  
National External Operations Program  
Office of Civil Rights  
Federal Aviation Administration  
777 S. Aviation Blvd., Suite 150  
El Segundo, CA 90245

May 16, 2019

RE: Juneau International Airport (JNU) – Disability ADA Compliance Mini Review Response

**Inspection Date:** September 2017

**Report Date:** April 17, 2019

**Inspection Site:** Juneau International Airport, 1873 Shell Simmons Drive, Juneau, AK 99801

Dear Mr. Klein:

Pursuant to the above referenced inspection, Juneau International Airport (JNU) submits the attached Airport Disability Compliance Mini Review findings matrix completed with either the actual date of compliance, or proposed date of anticipated compliance. Please note that the entire north end of the terminal (oldest sections) are scheduled for demolition/reconstruction starting in Fall 2019 and estimated completion by Spring 2021. JNU is requesting a waiver for any non-compliant items in this area until construction of the terminal is complete. In some cases, as noted in the matrix, temporary measures have been put in place (such as drinking fountain protection barriers).

JNU will update your office as compliance measures are met, or by August 31, 2019, whichever is sooner. Please let us know if any further documentation or information is required.

Sincerely,

Patricia K. Wahto  
Airport Manager



Attachments: JNU –Disability ADA Compliance Mini Review Findings Matrix

Copy: Mila Cosgrove, Deputy City Manager

## **Appendix C**

### **JNU Self-Evaluation Report**

2019 SELF-EVALUATION FINDINGS

| Item # | Category | Finding / Location  | Image  | Violation / Regulation  | Recommended Corrective Action   | Proposed Date of Compliance | Actual Date of Compliance |
|--------|----------|---|--|---|---|-----------------------------|---------------------------|
| 1      | B        | Family restroom sign /<br>Departure Lounge  |   | Sign mounting height (47")<br>is incorrect / ADA 703.4<br>Sign is not mounted on latch<br>side of door / ADA 703.4.2              | Remount sign with tactile<br>characters 48" minimum<br>and 60" maximum above<br>finish floor, and on latch<br>side of door. | 10/1/2021                   |                           |
| 2      | B        | Accessible parking for<br>short-term & long-term<br>lots on shortest route<br>to entrance /<br>Main Parking Lot |  | Parking spaces complying<br>with 502 shall be on the<br>shortest accessible route<br>from parking to an entrance<br>/ ADA 208.3.1 | Relocate accessible parking<br>spaces for short-term & long-<br>term lots on shortest route<br>to entrance.                 | 10/1/2021                   |                           |