

Milwaukee County Airport Division – Milwaukee Mitchell International Airport Title VI Plan

1. Title VI Policy Statement¹

The Milwaukee County Department of Transportation Airport Division (Airport Division) 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.

The Airport Division 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 Division agrees, among other things, to understand the communities surrounding or in the flight path of, as well as customers that use, Milwaukee Mitchell International Airport (MKE or the Airport). Anytime communities may be impacted by programs or activities, the Airport Division will take action to involve them and the general public in the decision-making process.

The Airport Division requires nondiscrimination assurances, as prescribed by the Federal Aviation Administration (FAA), from each tenant, contractor, and concessionaire providing an activity, service, or facility at the Airport. Assurances must be included in any related lease, contract, or franchise agreement between the Airport Division and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and subcontractors.

David Gelting available at (414) 747-6234 and dgelting@mitchellairport.com, is responsible for overseeing MKE’s compliance with Title VI and serving as the point of contact for all Airport Title VI matters and related responsibilities, including those required by Title 49 Code of Federal Regulations (CFR) Part 21.

Brian Dranzik
Signature
Brian Dranzik
Airport Director

December 11, 2023
Effective Date

[Effective Date plus 3 years]
3-Year Expiration Date

¹ This policy statement will be translated into languages other than English, upon request and based on patron and local language demographics.

2. Administration

The Airport Director has reviewed and adopted this Title VI Plan for MKE. 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 Airport Director's or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Airport Director and resubmittal to the FAA.

In addition to the Coordinator and Airport Division's leadership, the following people also assist with our Title VI Plan requirements:

Staff Supporting Title VI Program	Airport Sponsor Program / Office
Christine Turk	Airport Planning Manager
Harold Mester	Director of Public Affairs and Marketing
James Martin	Director of Finance and Administration
Christie Green	Marketing Coordinator
Matt Hoffman	Director of Business & Commercial Development
Tony Raab	Airport Principal Engineer

As of the date of this plan, the Airport Division has the following pending applications for federal financial assistance:

Federal Source	Grant Number	Amount
Airport Improvement Program (AIP) Entitlement	3-55-0045-110-2023	\$3,448,602 (federal share)
Bipartisan Infrastructure Law (BIL) Airport Infrastructure Grant (AIG)	3-55-0045-113-2023	\$2,583,943 (federal share)
BIL Airport Terminal Program (ATP)	3-55-0045-111-2023	\$5,134,396 (federal share)

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

Federal Source	Grant Award Information Available at:
FAA AIP	https://www.faa.gov/airports/aip/
BIL ATP	https://www.faa.gov/newsroom/bipartisan-infrastructure-law-airport-terminal-program-grants-file
BIL AIG	https://www.faa.gov/general/bipartisan-infrastructure-law-airport-infrastructure-grant-funding-amounts

3. Grant and Procurement Assurances

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

The Airport Division 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. The Airport Division and the Milwaukee County Procurement Division requires civil rights clauses are appropriately included in solicitations and contracts for all subcontractors, subleases, and any other agreements. The Procurement Division reviews and processes bid solicitations that the Airport Division releases.

The Airport Division utilizes standardized forms for other types of agreements to help ensure that they include the required provisions. Obligatory provisions and references are inserted into templates for contracts, leases and other agreements; these include:

- Provisions of nondiscrimination contract clauses requiring compliance with the acts and regulations relative to nondiscrimination in Federally assisted programs of the DOT and incorporating the acts and regulations into the contracts by reference in every contract or agreement subject to the nondiscrimination in Federally-assisted programs of the DOT acts and regulations.
- List of pertinent non-discrimination authorities in every contract/agreement and regulations and nondiscrimination contract clauses prohibiting discrimination on the basis of race, color, national origin, creed, sex, age, or handicap
- Equal Opportunity contract requirements.
- The requirement for contractors to make available to employees and applicants an equal opportunity policy and equal opportunity poster.
- The requirement to submit Equal Employment Opportunity (EEO) certificate with bid responses.
- Such provisions are applied to lessee/tenants, contractors, subcontractors, consultants, and other parties.

Additionally, Milwaukee County, Wisconsin Code of Ordinances (County Code) Chapter 56 Administrative Code for Milwaukee County Section 56.17. - Nondiscriminatory contracts requires that:

(1a) All contracts except those exclusions listed in paragraph (e)² let by or on behalf of the county, shall include the following provisions:

In the performance of work or execution of this contract, the contractor shall not discriminate against any employee or applicant for employment because of race, color, national origin or ancestry, age, sex, sexual orientation, gender identity and gender expression, disability, marital status, family status, lawful source of income, or status as a victim of domestic abuse, sexual assault or stalking, which shall include, but not be limited to, the following: employment, upgrading, demotion or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training including apprenticeships. The contractor will post in conspicuous places, available for employment, notices to be provided by the county setting forth the provisions of the nondiscriminatory clause. A violation of this provision shall be sufficient cause for the county to terminate the contract without liability for the uncompleted portion or for any materials or services purchased or paid for by the contractor for use in completing the contract.

County Code Chapter 56 Administrative Code for Milwaukee County Section 56.17. - Nondiscriminatory contracts (2) requires that:

“Except for exclusions in paragraph (1e) all directors, administrators and managers shall be responsible for obtaining compliance with the nondiscrimination provisions of this section and shall, in cooperation with the contract compliance auditor, verify compliance prior to the award of all contracts with an aggregate value of twenty thousand dollars (\$20,000.00) or more.”

Additionally, County Code Chapter 4 County Airports, Section 4.21 Nondiscrimination requires:

“Each air carrier and air transportation company operating at General Mitchell International Airport shall conduct its operation, maintenance, improvement and use of the property and facilities at the airport so that no person, on the grounds of race, color, sex, sexual orientation, gender identity and expression, ancestry or national origin, shall be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities; that in the construction of any improvements on, over or under such land and the furnishing of services thereon, no person, on the grounds of race, color, sex, sexual

² The exclusions applicable to paragraph (1a) are as follows: 1. Departmental purchase orders. 2. Emergency purchases when immediate action is required to preserve property or protect life, health or welfare of persons. 3. Sole source procurements, as determined by the purchasing standardization committee. 4. Purchases from foreign countries. 5. Purchases from governmental agencies. 6. Purchases from petty cash (limit of fifty thousand dollars (\$50,000.00)).

orientation, gender identity and expression, ancestry or national origin, shall be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination. Each air carrier and air transportation company shall use the premises in compliance with all other requirements imposed by or pursuant to title 49, Code of Federal Regulations, department of transportation, subtitle A, office of the secretary, part 21, nondiscrimination in federally assisted programs of the department of transportation - effectuation of title VI of the Civil Rights Act of 1964, and as said regulations may be amended.”

And County Code Appendix F – General Mitchell International Airport Non-Signature Airline Regulations Section 1702 – Nondiscrimination requires:

“Each air carrier and air transportation company operating at the Airport shall conduct its operation, maintenance, improvement and use of the property and facilities at the airport so that no person, on the grounds of race, color, ancestry or national origin, sex, sexual orientation, or gender identity and expression, shall be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities; that in the construction of any improvements on, over or under such land and the furnishing of services thereon, no person, on the grounds of race, color, ancestry or national origin, sex, sexual orientation, or gender identity and expression, shall be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination. Each air carrier and air transportation company shall use the premises in compliance with all other requirements imposed by or pursuant to title 49, Code of Federal Regulations, department of transportation, subtitle A, office of the secretary, part 21, nondiscrimination in federally assisted programs of the department of transportation - effectuation of title VI of the Civil Rights Act of 1964, and as said regulations may be amended and all Milwaukee County rules and regulations, policies, procedures and ordinances in effect or as they may be amended from time to time.”

Description of Oversight Methods for Subcontracts

- Obligatory provisions and references are inserted into base templates and the templates are reviewed periodically by the Airport Division’s Business & Commercial Development staff to ensure accordance and consistency with Sponsor Assurances. Periodic performance audits are conducted to ensure compliance. Annually, 10 percent of all Airport contracts will be randomly sampled, and all associated subcontracts will be reviewed to determine if they include required civil rights clauses. Milwaukee County’s Architecture, Engineering & Environmental Services Department is actively developing new procedures and practices to ensure enhanced efficiency and better document audit results and follow up resolutions.

4. Title VI Coordinator Responsibilities

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

- 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 **Section 11** for more information on the expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures the Airport Division is in compliance with nondiscrimination requirements of Title VI and reports to Airport Division leadership on the status of Title VI compliances.
- Responds promptly to requests by the 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 their 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 Division 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] and [c]). Data collection methods will include optional demographic questions in the following: Airport customer satisfaction surveys, customer complaints, Airport event sign-in sheets, and bids/proposals for Airport contracts, as well as 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 **Section 12** regarding compliance reviews, audits, complaints, lawsuits, and other investigations.

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)

The Airport Division conspicuously displays the FAA-provided Unlawful Discrimination Poster in all public areas on Airport property, including those with pedestrian activity. The Coordinator ensures these posters are visible, accessible,³ 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.

The Airport Division has posted the above Title VI policy statement at its staff offices. See **Appendix A** for the completed Unlawful Discrimination Poster. These posters are provided in English and Spanish. The Unlawful Discrimination Posters are conspicuously displayed in multiple locations at MKE: Main Terminal, Concourse C, Concourse D, Ticketing, and Baggage.

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area
Main Terminal	2	
Concourse C		2
Concourse D		3
Ticketing	2	
Baggage	2	
International Terminal Building	1	
Rental Cars	1	
Fixed Based Operators (FBO)	3	

The Airport Division will distribute this Title VI Plan among its employees and Airport contractors, concessionaires, lessees, and tenants upon approval by the FAA. This plan will be distributed during a monthly airport tenant meeting, will be emailed to airport employees, and will be distributed to new airport contractors, concessionaires, lessees, and tenants during the onboarding process. This plan will also be available via MKE's website at: <https://www.mitchellairport.com/airport-information/civil-rights-information>

³ For more information about website accessibility, please visit ADA.gov.

Outreach to Affected Communities

The Airport Planning Department and the Marketing & Public Relations Department ensures that notices for public meetings reach all segments of the impacted community. The Airport's Marketing and Public Relations Department will identify the effective media platforms to share announcements and notices, such as on the Airports' website at <https://www.mitchellairport.com>, via notices for Milwaukee County Committee on Transportation and Transit meetings which are posted online to Milwaukee County's Legislative Information Center ("Legistar") and distributed via email to those that opt-in to receive such emails, via notices for Milwaukee County Board meetings are posted online to Milwaukee County's Legislative Information Center ("Legistar") and distributed via email to those that opt-in to receive such emails, through the Airport's social media pages (MKE Twitter account @MKE – Milwaukee Airport, the MKE Instagram account @mitchellairport, the MKE Facebook account @MKE – Milwaukee Mitchell International Airport, and the MKE LinkedIn account @MKE-Milwaukee Mitchell International Airport), by public notices published in newspapers specified by Chapter 985 of the Wisconsin Statutes (these newspapers are currently the Daily Reporter and the Milwaukee Journal Sentinel), through paid advertising with the Milwaukee Journal Sentinel, Business Journal, Shepherd Express, and others, through Spanish-language versions of MKE's e-newsletter available at <https://www.mitchellairport.com/es> and <https://www.mitchellairport.com/airport-information/newsletter>, and through direct mail. Press conference notifications are made directly to local media via email and telephone as necessary.

The Airport's Marketing and Public Relations Department contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities⁴ and provide important feedback on translated materials. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

Detailed information on our public notice and outreach procedures will be available in the Airport Division CPP, upon approval by the FAA. At that time, a copy of the CPP will be available via the at <https://www.mitchellairport.com/airport-information/civil-rights-information> or Title VI Coordinator, and a copy of the CPP will be attached to this Title VI Plan.

To ensure the community is effectively informed of and able to participate in public hearings, the Airport Division includes public notices translated into appropriate languages, including any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such postings and notices will include directions for obtaining an interpreter, free of charge, for public hearings, per 28 CFR § 42.405(d). See Section 8.

47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898.

⁴ 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 identify their community demographics (49 CFR § 21.9[b]). The Airport Division seeks to understand communities that are eligible to be served, actually or potentially affected, and/or benefited or burdened by the Airport’s activities, programs, and services. By understanding community demographic information, the Airport Division can identify, understand, and appropriately engage with the communities surrounding MKE. The profiles contained herein can be used to evaluate and assess whether identified low-income, minority, LEP, or ethnically diverse populations could potentially bear disproportionately high and adverse impacts from a future proposed Airport project(s).

The U.S. Census Tracts that intersect with the Airport’s 65 day-night average sound level (DNL) noise contour are determined to experience potential direct effects (areas that would be physically disturbed) and indirect effects (areas that could experience air quality, noise, traffic, or visual effects) of a proposed Airport project. As such, these communities will be referred to collectively as “the Affected Communities.”

Affected Communities⁵	Population
Census Tract 207	4,564
Census Tract 208	3,246
Census Tract 209	2,737
Census Tract 210	2,094
Census Tract 216	4,194
Census Tract 217	6,405
Census Tract 1601.01	4,182
Census Tract 1601.02	2,390
Census Tract 1802	5,037
Census Tract 1803	3,275
Census Tract 1805	4,411
Census Tract 1852	4,777

⁵ “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.

Within MKE's Affected Communities, Environmental Justice Communities of Concern are found to exist if:

1. the minority population exceeds 50 percent, or
2. the minority population percentage is meaningfully greater (at least 10 percentage points greater) than adjacent geographical units (MKE's Surrounding Communities⁶), or
3. there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds.

Through these metrics, MKE has been found to have six Environmental Justice Communities of Concern located at Census Tracts 207, 208, 209, 210, 216, and 217.

The following details have been identified about the Airport's Affected Communities.

Low-Income Communities.⁷

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the U.S. 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*, the Airport Division is collecting information about affected and potentially affected low-income communities. According to U.S. Census Report S1701, *Poverty Status in the Past 12 Months*, the overall poverty level for the Surrounding Community is approximately 10.0 percent. The poverty rate remains similar compared with the rest of Milwaukee County.

⁶ MKE's Surrounding Communities is a reference community utilized for comparison with the Affected Community, which is made up of selected US Census Tracts within Milwaukee County that are adjacent to the US Census Tracts that intersect with the 2004 65 DNL noise contour. This reference area includes [33] tracts surrounding the Airport.

⁷ Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, these data will be utilized in our CPP to help ensure the meaningful involvement of low-income communities in Airport programs and activities.

The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
Census Tract 207	11%
Census Tract 208	5%
Census Tract 209	10%
Census Tract 210	6%
Census Tract 216	17%
Census Tract 217	6%
Census Tract 1601.01	7%
Census Tract 1601.02	5%
Census Tract 1802	10%
Census Tract 1803	7%
Census Tract 1805	6%
Census Tract 1852	9%

Racial and Ethnic Communities.

U.S. Census Bureau demographic data were evaluated to identify racial and ethnic communities and populations in each Affected Community. The demographic composition by race and ethnicity for the Airport's Affected Communities is as follows:

Affected Community: Census Tract 207
Total Affected Community Population: 4,564

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	3,904	86%
Black or African American	124	3%
American Indian or Alaska Native	0	0%
Asian	0	0%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	199	4%
Some Other Race Alone	337	7%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	771	17%
Not Hispanic or Latino	3,793	83%

Affected Community: Census Tract 208
Total Affected Community Population: 3,246

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	3,025	93%
Black or African American	10	0%
American Indian or Alaska Native	15	0%
Asian	20	1%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	171	5%
Some Other Race Alone	5	0%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	232	7%
Not Hispanic or Latino	3,014	93%

Affected Community: Census Tract 209
Total Affected Community Population: 2,737

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	2,403	88%
Black or African American	12	0%
American Indian or Alaska Native	17	1%
Asian	21	1%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	146	5%
Some Other Race Alone	138	5%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	602	22%
Not Hispanic or Latino	2,135	78%

Affected Community: Census Tract 210
Total Affected Community Population: 2,094

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	1,599	76%
Black or African American	145	7%
American Indian or Alaska Native	8	0%
Asian	60	3%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	234	11%
Some Other Race Alone	48	2%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	231	11%
Not Hispanic or Latino	1,863	89%

Affected Community: Census Tract 216
Total Affected Community Population: 4,194

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	3,198	76%
Black or African American	38	1%
American Indian or Alaska Native	0	0%
Asian	394	9%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	299	7%
Some Other Race Alone	265	6%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	1,090	26%
Not Hispanic or Latino	3,104	74%

Affected Community: Census Tract 217
Total Affected Community Population: 6,405

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	5,625	88%
Black or African American	58	1%
American Indian or Alaska Native	46	1%
Asian	184	3%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	360	6%
Some Other Race Alone	132	2%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	825	13%
Not Hispanic or Latino	5,580	87%

Affected Community: Census Tract 1601.01
Total Affected Community Population: 4,182

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	3,536	85%
Black or African American	66	2%
American Indian or Alaska Native	24	1%
Asian	207	5%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	209	5%
Some Other Race Alone	140	3%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	482	12%
Not Hispanic or Latino	3,700	88%

Affected Community: Census Tract 1601.02
Total Affected Community Population: 2,390

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	1,945	81%
Black or African American	237	10%
American Indian or Alaska Native	52	2%
Asian	44	2%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	112	5%
Some Other Race Alone	0	0%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	288	12%
Not Hispanic or Latino	2,102	88%

Affected Community: Census Tract 1802
Total Affected Community Population: 5,037

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	4,613	92%
Black or African American	207	4%
American Indian or Alaska Native	0	0%
Asian	39	1%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	178	4%
Some Other Race Alone	0	0%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	364	7%
Not Hispanic or Latino	4,673	93%

Affected Community: Census Tract 1803
Total Affected Community Population: 3,275

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	2,920	89%
Black or African American	38	1%
American Indian or Alaska Native	9	0%
Asian	13	0%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	170	5%
Some Other Race Alone	125	4%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	573	17%
Not Hispanic or Latino	2,702	83%

Affected Community: Census Tract 1805
Total Affected Community Population: 4,411

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	4,084	93%
Black or African American	40	1%
American Indian or Alaska Native	10	0%
Asian	75	2%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	187	4%
Some Other Race Alone	15	0%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	311	7%
Not Hispanic or Latino	4,100	93%

Affected Community: Census Tract 1852
Total Affected Community Population: 4,777

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	4,025	84%
Black or African American	138	3%
American Indian or Alaska Native	0	0%
Asian	88	2%
Native Hawaiian or Other Pacific Islander	0	0%
More than one	135	3%
Some Other Race Alone	391	8%
No response / would not say	0	0%

Demographic Group Within Affected Community	Number of Hispanic or Latino and Non-Hispanic or Latino Population	Percent of Total Affected Community Population
Hispanic or Latino	659	14%
Not Hispanic or Latino	4,118	86%

Limited English Proficiency

The goal of all language access planning and implementation is to ensure that the Airport Division communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁸ that are spoken in LEP households in the Affected Communities that meet the safe harbor threshold. The data source is American Community Survey, Table B16001, “Language Spoken at Home by Ability to Speak English.”⁹

The threshold we have used for identifying the languages with significant LEP populations is the safe harbor threshold in the DOT “*Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons*”, which is 5 percent or 1,000, whichever is less.¹⁰ The safe harbor for MKE’s community is 1,000. Please refer to Appendix B for data on all languages in our community.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
Spanish	1,153	+/-483

⁸ It is recommend that language groups from the U.S. Census are used, and data are used for the “Speak English less than ‘very well’” category for each language over the threshold.

⁹ US Census Bureau, 2015 American Community Survey 1-Year Estimates, Table B16001, “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over,” <https://data.census.gov/table?q=B16001> (accessed July 2023).; 2015 census data are the most current U.S. Census Bureau data for the Affected Communities. There is limited availability for Community Survey data for the years 2016 through 2020.

¹⁰ See the DOT “Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons” at <https://www.transportation.gov/civil-rights/civil-rights-library/policy-guidance-concerning-recipients-responsibilities-limited> and <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, they provide a consistent starting point for identifying significant LEP populations.

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages): [Use an “X” to indicate the frequency for each language encountered]

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)
Spanish			X	
Hmong		X		
Chinese		X		
German	X			
Arabic	X			
Other Asian languages	X			
Russian	X			
French (incl. Patois, Cajun)	X			
Vietnamese	X			
Other Indic languages	X			
Serbo-Croatian	X			
Other Indo-European languages	X			
African languages	X			
Hindi	X			
Laotian	X			
Italian	X			
Polish	X			
Korean	X			
Tagalog	X			
Urdu	X			
Portuguese or Portuguese Creole	X			
Japanese	X			
Other Slavic Languages	X			
Other and Unspecified Languages	X			
Greek	X			
Gujarati	X			
Yiddish	X			
Thai	X			
Hebrew	X			
Persian	X			

NOTES: Frequency of each language encountered are based on Ricondo & Associates, Inc.'s analysis of US Department of Transportation and Sabre CY 2022 data.

SOURCES: US Census Bureau, 2015 American Community Survey 5-Year Estimates, (Table B16001), accessed July 2023; US DB1b Survey and Form T-100 accessed July 2023; Sabre accessed July 2023; Ricondo & Associates, Inc., August 2023 (analysis)

Languages spoken within the Milwaukee County Transit System LEP Plan (Spanish, Asian and Pacific Islander Languages, and Other Indo-European languages¹¹), Southern Wisconsin Regional Planning Commission Title VI Report (Spanish, Asian and Pacific Islander Languages and Other Indo-European languages), the Milwaukee County Circuit Language Access Plan (Arabic, Chinese, and Other Asian Languages), and the Milwaukee County Department of Health and Human Services Division of Youth and Family Services Limited English Proficiency (LEP) Plan (Spanish) are within the languages spoken by LEP persons at MKE.

¹¹ US Census Bureau, <https://www.census.gov/topics/population/language-use/about.html> (accessed September 2023). The classification “Asian and Pacific Islander Languages” includes Chinese (incl. Mandarin, Cantonese), Japanese, Korean, Hmong, Vietnamese, Khmer, Thai, Lao, or other Tai-Kadai languages, Other languages of Asia, Tagalog (incl. Filipino), Ilocano, Samoan, Hawaiian, or other Austronesian languages and the classification “Other Indo-European languages” includes French, incl. Cajun, Haitian, Italian, Portuguese, German, Yiddish, Pennsylvania Dutch or other West Germanic languages, Greek, Russian, Polish, Serbo-Croatian, Ukrainian or other Slavic languages, Armenian, Persian (incl. Farsi, Dari), Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, or other Indic languages, Other Indo-European languages, Telugu, Tamil, and Malayalam, Kannada, or other Dravidian languages per the US Census Bureau.

This demographic information is updated annually¹² through checking the following resources:

Data Sources for Languages Spoken in Affected Community

Website link to Data Source

U.S. Census Bureau	https://www.census.gov/topics/population/language-use/about.html
Milwaukee County Transit System	https://www.ridemcts.com/getattachment/Accessibility/Title-VI/2023-MCTS-TITLE-VI-PROGRAM-PLAN-UPDATE.pdf?lang=en-US
Southeastern Wisconsin Regional Planning Commission	https://www.sewrpc.org/SEWRPCFiles/CommissionFiles/GeneralInfo/title-VI-program.pdf
Milwaukee County Circuit Court	https://county.milwaukee.gov/files/county/courts/Documents/Courts/LAPMilwaukeeCounty.2020.docx.pdf
Milwaukee County Department of Health and Human Services Division of Youth and Family Services	https://county.milwaukee.gov/files/county/DHHS/Providers/LimitedEnglishProficiencyPolicyProcedures_2021_22.pdf

Beneficiary Diversity.

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

Description of Beneficiary Demographic Information Collection Methods

- Under 49 CFR Parts 23 and 26, the Milwaukee County Office of Economic Inclusion (OEI) both certifies Disadvantaged Business Enterprises (DBEs) and Airport Concessions Disadvantaged Business Enterprises (ACDBEs) and monitors their participation and payment on Airport Division projects with DBE and ACDBE goals. Since these federal programs are race and gender conscious and were created to level the playing field for socially and economically disadvantaged groups that have historically been excluded from participating in federal procurement, when these firms are certified, their race and gender and company information (along with other demographic information) is uploaded to the Wisconsin Unified Certification Program (UCP) DBE Directory.
- On an annual basis, OEI reports required demographic information related to the participation and payments/gross receipts of DBEs and ACDBEs (as applicable) to the FAA.
- Age and gender demographic information is collected as part of ACI World's Airport Service Quality (ASQ) survey.¹³ The ASQ survey is administered by independent

¹² Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during its 3-year period.

¹³ Airports Council International World, "Airport Customer Experience and ASQ", accessed September 2023 <https://aci.aero/programs-and-services/asq/>

representatives on random dates with no notice to the Airport operator; results are gathered and collated by ASQ quarterly on an ongoing basis with 350 respondents per quarter being surveyed.¹⁴

- Sign-in sheets request voluntary demographic information from attendees.

Staff and Advisory Board Diversity.

- Demographic information is collected from members of planning and advisory boards through voluntary disclosures.
- All Milwaukee County employees, including Airport Division employees and Milwaukee County elected officials, have demographic information collected voluntarily during the hiring process, and this data is publicly available online at:

<https://county.milwaukee.gov/EN/Vision/Strategy-Dashboard/Workforce-Data>

¹⁴ Mitchell International Airport, "MKE Receives 2nd Straight Airport Service Quality (ASQ) Award", accessed September 2023 https://www.mitchellairport.com/application/files/5916/7829/4367/2022_ASQ_Award_news_release.pdf

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 Airport Division activity can 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, and legitimate nondiscriminatory justification, as 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.¹⁵

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
Runway 1L/19R	None
Runway 7R/25L	None
Runway 13/31	None
Runway 7L/25R	None
Runway 1R/19L	None
Terminal Building	None
Parking Structure & Lots	None
Rental Car Center	None
MKE Business Park	None
Fixed Based Operators (FBOs)	None
Cargo Facilities	None

¹⁵ In order to carry out an alternative with a discriminatory impact, the Airport Division must demonstrate 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.

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
MKE Obstruction Mitigation/Removal	None
MKE Obstruction Removal	None
MKE Rehabilitate Taxiway Y	None
Rehabilitate PAPA Pad	None
Rehabilitate GRE Ramp	None
MKE AARF Building Overhead Door	None
MKE South Ramp Improvement & Development projects	None
Airport South Shop Highway Facility	None
MKE Parking Structure P/T Anchorages	None
MKE Rehabilitate Taxiway F (Between Runway 19R and Taxiway H)	None
MKE Relocate Taxiway M High-speed Exit - Reconstruct	None
MKE Fuel Farm Roadway Reconstruct	None
MKE Snow Removal Equipment Replacement (Equipment)	None
MKE Gate C12 Fuel Pit	None
MKE Crash Phone Replacement (Equipment)	None
MKE Remove Runway 1R-19L (North of Taxiway W)	Unknown - to be determined through a National Environmental Policy Act (NEPA) Environmental Assessment (EA)
MKE North Airfield Taxiway Geometry Improvements (Remove Runway 13-31 and Taxiways G and U)	Unknown - to be determined through a NEPA EA
MKE ARFF Vehicle Replacement (Equipment)	None
MKE Vehicle/Equipment Replacement (Equipment)	None
MKE Snow Removal Equipment Replacement (Equipment)	None
MKE Car Rental Bathrooms	None
MKE Car Rental Car Lobby Renovation	None
MKE Parking Structure Moving Walkway Modernization	None
MKE Noise Study	None
MKE South Airfield Rehab (Runway 1L) and Reconfigure South Airfield Taxiways Work	None
MKE ARFF Vehicle Replacement (Equipment)	None
MKE Snow Removal Equipment Replacement (Equipment)	None
MKE Admin Reconfiguration and Remodel	None
MKE Super Saver Lot A Rehab	None
MKE Surface Lot Rehab	None
MKE Employee Parking Lot Replacement	None

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?
Runway 1L/19R	None	N/A
Runway 7R/25L	None	N/A
Runway 13/31	None	N/A
Runway 7L/25R	None	N/A
Runway 1R/19L	None	N/A
Terminal Building	None	N/A
Parking Structure & Lots	None	N/A
Rental Car Center	None	N/A
MKE Business Park	None	N/A
Fixed Based Operators (FBOs)	None	N/A
Cargo Facilities	None	N/A
MKE Obstruction Mitigation/Removal	None	N/A
MKE Obstruction Removal	None	N/A
MKE Rehabilitate Taxiway Y	None	N/A
Rehabilitate PAPA Pad	None	N/A
Rehabilitate GRE Ramp	None	N/A
MKE AARF Building Overhead Door	None	N/A
MKE South Ramp Improvement & Development projects	None	N/A
Airport South Shop Highway Facility	None	N/A
MKE Parking Structure P/T Anchorages	None	N/A
MKE Rehabilitate Taxiway F (Between Runway 19R and Taxiway H)	None	N/A
MKE Relocate Taxiway M High-speed Exit - Reconstruct	None	N/A
MKE Fuel Farm Roadway Reconstruct	None	N/A
MKE Snow Removal Equipment Replacement (Equipment)	None	N/A
MKE Gate C12 Fuel Pit	None	N/A
MKE Crash Phone Replacement (Equipment)	None	N/A
MKE Remove Runway 1R-19L (North of Taxiway W)	Unknown - to be determined through a NEPA EA	To be determined through a NEPA EA
MKE North Airfield Taxiway Geometry Improvements (Remove Runway 13-31 and Taxiways G and U)	Unknown - to be determined through a NEPA EA	To be determined through a NEPA EA
MKE ARFF Vehicle Replacement (Equipment)	None	N/A
MKE Vehicle/Equipment Replacement (Equipment)	None	N/A

Facilities or Construction Projects with Disparate Impacts	Affected Community Impacted	Impact Can Be Eliminated?
MKE Snow Removal Equipment Replacement (Equipment)	None	N/A
MKE Car Rental Bathrooms	None	N/A
MKE Car Rental Car Lobby Renovation	None	N/A
MKE Parking Structure Moving Walkway Modernization	None	N/A
MKE Noise Study	None	N/A
MKE South Airfield Rehab (RW 1L) and Reconfigure South Airfield Taxiways Work	None	N/A
MKE ARFF Vehicle Replacement (Equipment)	None	N/A
MKE Snow Removal Equipment Replacement (Equipment)	None	N/A
MKE Admin Reconfiguration and Remodel	None	N/A
MKE Super Saver Lot A Rehab	None	N/A
MKE Surface Lot Rehab	None	N/A
MKE Employee Parking Lot Replacement	None	N/A

Justifications:

The removal of Runway 1R-19L (North of Taxiway W) and the North Airfield Taxiway Geometry Improvements projects, which will include the removal of Runway 13-31 and Taxiways G and U may or may not have disparate impacts on the Airport's Affected Communities. The identification of any potential impacts, the elimination of said potential impacts, and, if necessary, the justification for why the disparate impacts cannot be eliminated will be determined through each project's upcoming Environmental Assessment, which the Airport Division will be working on in coordination with the FAA ADO.

8. Limited English Proficiency (LEP) Executive Order 13166

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

According to **Section 6**, which presents community statistics, Spanish has been identified as the language spoken by LEP persons in Affected Communities, which meets the safe harbor threshold for written translation.

The Airport Division also collects data on languages spoken by Airport guests.¹⁶ Data sources include the following:

Data Sources for Languages Spoken by Airport Guests

Data Source	Website link to Data Source
LanguageLine Solutions	https://www.language.com/
Sabre Market Data – assumption from flight origin/destination	https://prod.marketintelligence.sabre.com/mi/MarketIntelligence.html#OD
U.S. DOT, DB1B Survey Market Data – assumption from flight origin/destination	https://mi.diio.net/mi/oandd/dynamic
U.S. DOT, Form T-100 – assumption from flight origin/destination	https://mi.diio.net/mi/t100/dynamic
The World Factbook Field Listing – Languages – assumption from flight origin/destination	https://www.cia.gov/the-world-factbook/field/languages/
Four and Forty-Two Group Classifications of Languages Spoken at Home with Examples – assumption from flight origin/destination	https://www.census.gov/topics/population/language-use/about.html

Based on the above data, no additional languages to those listed in Section 6 Community Statistics are identified as likely to be spoken by LEP Airport guests.

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 translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform Airport Division leadership and staff of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure individuals

¹⁶ We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language were not available beforehand, or the safe harbor threshold for written translation was not met.

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
Source Ten (local firm that provides English-to Spanish translation services on behalf of the Airport).	Spanish

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport website's translate view: https://www.mitchellairport.com/es	Spanish
Airport Information Booth – Staff is trained to call LanguageLine to provide on-demand translation services	Upon request

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
MKE uses a third-party translation contractor (LanguageLine Solutions) to provide verbal translations upon request.	Upon request
Source Ten (local firm that provides English-to Spanish interpretation services on behalf of the Airport).	Spanish

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport website translate view	Spanish
Airport Information Booth – Staff is trained to call LanguageLine to provide on-demand translation services	Upon request

Translation Services:

- MKE has over 50 Travelers Aid Volunteers, some of whom are able to speak other languages, such as Spanish and Chinese, who are trained to assist travelers with various tasks and information regarding Airport facilities and staff the Airport Information desk.
- The Airport Information desk offers Language Line translation services. Staffers at the Airport Information desk would call Language Line on behalf of the person requesting interpretation services. The Airport Information Desk is staffed during all hours the airport has arriving or departing flights.
- A local firm, Source Ten, provides English-to-Spanish translation services on behalf of the Airport upon request.
- A Spanish-language landing page for is provided at <https://www.mitchellairport.com/es>. The Airport is actively exploring providing a more comprehensive website translation, estimated to be enacted in 2025.
- Every sign in the International Arrivals Terminal is displayed in both English and Spanish.
- Spanish-language announcements on the terminal public address system are made upon request.

9. Transportation

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

As noted in **Section 6** 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 the Affected Communities are also identified below.

We have coordinated with Milwaukee County Transit System to encourage them to provide transit service access between the airport and the Airport's Affected Communities.

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
None	Milwaukee County Transit System Bus Route Greenline Service operates between Bayshore Town Center and Mitchell International Airport, traveling through downtown Milwaukee along the way.	Existing
Minority population	Milwaukee Country Transit System Bus Route 80 Connects downtown Milwaukee and the downtown MATC campus to Mitchell International Airport and the MATC-South Campus in Oak Creek bus	Existing

Source: Milwaukee County Transit System, 2023 Title VI Program, Milwaukee County, Wisconsin "2022 Title VI Route Evaluation"; <https://www.ridemcts.com/getattachment/Accessibility/Title-VI/2023-MCTS-TITLE-VI-PROGRAM-PLAN-UPDATE.pdf?lang=en-US#:~:text=In%20addition%20to%20the%20reporting.policy%2C%20disparate%20impact%20policy%20and>

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
All Airport Concessions and Business Opportunities	<ul style="list-style-type: none"> • The Milwaukee County Office of Economic Inclusion (OEI) hosts quarterly outreach meetings with firms and the community to discuss doing business with Milwaukee County and existing opportunities. • OEI also sends outreach notification blasts in B2G to firms regarding available open opportunities. • OEI also works with all Milwaukee County Departments (including Aviation) to post open opportunities on multiple platforms, such as the County website, Bonfire, E-notify, and Bid Express. • For projects not funded with U.S. DOT or FAA contributions, Milwaukee County has a Targeted Business Enterprise (TBE) program. The TBE program widens the pool of potential minority, women and small business enterprises to contract services with. A definition of a TBE is any company that is certified as a DBE under the Wisconsin United Certification Program (WisUCP), certified as a minority- or women-owned business with the State of Wisconsin Department of Administration, or registered as a small business in the Small Business Administration (SBA) SAM registry. Milwaukee County has an average TBE participation goal of 21%. For projects funded by U.S. DOT or FAA contributions, solicitations include notification to bidders that in any Federal contract, Disadvantaged Business Enterprises (DBE) and Airport Concession Disadvantaged Business Enterprises (ACBDE) will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award. • Notification of opportunities to minority chambers to encourage firms to seek TBE/DBE/ACBDE certification. • Consultant and construction contracts have an allocated TBE or DBE percentage set by the OEI to ensure equal opportunity. • Standard Milwaukee County solicitation language is included to ensure minority and women-owned businesses participate on contracts: <i>"Agree, if awarded, to enter a contract with the county and comply with all terms and conditions required by state or local law, regulation, or ordinance; and agree that any subcontractors used to provide services will be contracted directly with the Respondent and that Respondent will be wholly responsible for the subcontracted vendor in performance of responsibilities under any awarded Contract."</i> • Payments to TBE and DBE subcontractors/subconsultants are monitored throughout the construction process to ensure compliance. • Periodic field audits are performed to ensure compliance. • OEI and the Architecture, Engineering & Environmental Services (AE & ES) departments participate in outreach "trade fairs" to solicit interest in bidding from a variety of businesses.

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 Milwaukee County's OEI and AE & ES departments, and the Airport Division's Business and Commercial Development Department.

11. Training

New employee orientation will incorporate Title VI training upon FAA approval of this Plan. Topics will include:

- Title VI of the Civil Rights Act of 1964 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 the FAA of any pending investigations and reviews, including the following:

- compliance reviews or audits concerning civil rights requirements¹⁷
- complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹⁸

As discussed in **Section 13**, Title VI Complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, the Airport Division 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.

¹⁷ Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the MKE or any of its sub-recipients by any state, local, or federal agency.

¹⁸ Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, because of actions of the MKE itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

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 matters¹⁹
3. Allege misconduct by the Airport Division, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the Airport Division including airport employees, contractors, concessionaires, lessees, or tenants.

Rights. Any person who believes that they have 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 Airport sponsor. Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Department of Justice or DOT, or the FAA, or seek other legal remedies.

Receipt of Complaint. Per the Airport’s policy, the complainant presents a written complaint to Airport Administration by email through:

info@mitchellairport.com, Attention: “Airport Director”

by FAX to:

414.747.4525

Attention: Airport Director

or by mail:

Airport Administration

Attention: Airport Director

Milwaukee Mitchell International Airport

5300 S Howell Avenue

Milwaukee, WI 53207

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. Accommodations will be provided upon request for individuals unable to file a written complaint due to a disability.

¹⁹ 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.

Complaints must be filed within 180 days of the discriminatory event, must be in writing, and the written complaint must contain the following information:

- a. Complainant Name, Address, Telephone Number, email address.
- b. A statement of the perceived discrimination actions
- c. Identification of the person(s) and/or business(es) involved in the discriminatory act(s)
- d. Identification of witnesses (if any).

The Airport Director then notifies the complainant in writing that the complaint has been received and is being taken seriously and that Airport staff will be contacting him/her for further information about the complaint and that the complainant also has the right to file a complaint directly to the FAA.

The Airport Director will then notify the alleged discriminating party that the complaint is under investigation, that such complaints are taken seriously, that their cooperation is expected, and that judgment will be withheld until a determination is made.

Within 15 days of receipt of the complaint, the Title VI 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 Office Civil Rights

Initial Procedure. The Coordinator may meet with the complainant by email or telephone 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 the FAA.

Discrimination Complaint Referral Procedure

Internal Complaint Referral. All Title VI Complaints must be promptly forwarded to the Coordinator within 2 days.

Initial FAA Notification. A copy of each Title VI Complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof, to the FAA civil rights staff. (Note: complaints based on disability do not have to be forwarded to the FAA.) To transmit complaint information to the FAA, the Coordinator uploads information to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from the FAA, as needed, throughout complaint intake, investigation, and resolution process.

Investigation Procedure

Assignment of Investigator. The Airport Director assigns the complaint to the Title VI Coordinator who is charged with the investigation of the complaint, which includes but is not

limited to, contact with complainant by telephone, mail, and/or in person, and, related party interviews and/or site visits, to conduct the initial investigation within ten (10) working days of receipt of the complaint.

Cooperation with the 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 MKE, 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 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, as well as to speak with community members and potential witnesses, as appropriate.

Investigation Report. When the investigation is complete, a written report is prepared. The report is done in conjunction with County Corporation Counsel. The formal report and response is forwarded to the complainant.

Consultation with Legal Counsel. In each case, the Coordinator will consult with Airport Legal Counsel regarding the investigation and the report. Airport Legal Counsel will ensure the report is consistent with the DOT and FAA Title VI nondiscrimination requirements.

Prompt Resolution of Disputes. Upon receipt of the complaint, Airport staff will immediately investigate and attempt an early resolution.

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 MKE's conclusion regarding whether unlawful discrimination occurred, and it 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, Office of Civil Rights, via *the FAA Civil Rights Connect System*.

However, there have been no Title VI complaints in recent history, so none have been filed using 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 Director.
- The written appeal must be received within 10 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 Director will issue a final written decision in response to the appeal.
- Copies of all documents are sent to the FAA.

Avoiding Future Discrimination. In addition to taking action with respect to any specific instances of discrimination, the MKE will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. The Airport's 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 David Gelting, Title VI Coordinator, available at (414) 747-6234 and dgelting@mitchellairport.com.

This complaint procedure is shared with the public through the MKE Title VI Nondiscrimination Policy and Complaint Procedure located online at:
<https://www.mitchellairport.com/application/files/7015/6875/0432/MilwaukeeCountyNonDiscriminationPolicy.pdf>.

Appendix A 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: [Dave Gelting](#)
Phone: [414-747-5325 Option #3](#)
Address: [5300 South Howell Avenue](#)
[Milwaukee, WI 53207](#)

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.

Coordinator: [Dave Gelting](#)
Teléfono: [414-747-5325 Option #3](#)
Dirección: [5300 South Howell Avenue](#)
[Milwaukee, WI 53207](#)



U.S. Department of Transportation
Federal Aviation Administration

HC-101088

Appendix B Population/Language Data

APPENDIX B – POPULATION / LANGUAGE DATA
2020 US Census Bureau, Table S1701, "Poverty Status in the Past 12 Months"

Label (Grouping)	Milwaukee County, Wisconsin			Census Tract 207, Milwaukee County, Wisconsin			Census Tract 208, Milwaukee County, Wisconsin			Census Tract 209, Milwaukee County, Wisconsin			Census Tract 210, Milwaukee County, Wisconsin			Census Tract 216, Milwaukee County, Wisconsin			Census Tract 217, Milwaukee County, Wisconsin			Census Tract 1601.01, Milwaukee County, Wisconsin			Census Tract 1601.02, Milwaukee County, Wisconsin		
	Population	Percent below poverty level	Estimate	Population	Percent below poverty level	Estimate	Population	Percent below poverty level	Estimate	Population	Percent below poverty level	Estimate	Population	Percent below poverty level	Estimate	Population	Percent below poverty level	Estimate	Population	Percent below poverty level	Estimate	Population	Percent below poverty level	Estimate	Population	Percent below poverty level	Estimate
Population for whom poverty status is determined	927,928	170,190	18.30%	4,564	485	10.60%	3,246	163	5.00%	2,737	272	9.90%	2,094	131	6.30%	4,194	718	17.10%	6,405	364	5.70%	4,182	288	6.90%	2,390	117	4.90%
AGE																											
Under 18 years	224,176	59,287	26.40%	824	210	25.50%	524	16	3.10%	735	135	18.40%	395	9	2.30%	1,143	322	28.20%	1,141	55	4.80%	836	57	6.80%	340	0	0.00%
Under 5 years	64,314	18,419	28.60%	248	68	27.40%	163	0	0.00%	204	24	11.80%	105	0	0.00%	220	91	41.40%	372	10	2.70%	276	0	0.00%	135	0	0.00%
5 to 17 years	159,862	40,868	25.60%	576	142	24.70%	361	16	4.40%	531	111	20.90%	290	9	3.10%	923	231	25.00%	769	45	5.90%	560	57	10.20%	205	0	0.00%
Related children of householder under 18 years	223,330	58,464	26.20%	824	210	25.50%	524	16	3.10%	712	112	15.70%	395	9	2.30%	1,143	322	28.20%	1,141	55	4.80%	836	57	6.80%	340	0	0.00%
18 to 64 years	577,959	95,871	16.60%	3,047	223	7.30%	2,255	134	5.90%	1,685	120	7.10%	1,347	87	6.50%	2,475	341	13.80%	4,103	185	4.50%	2,723	91	3.30%	1,708	99	5.80%
18 to 34 years	234,209	48,065	20.50%	1,137	163	14.30%	929	54	5.80%	532	100	18.80%	471	53	11.30%	833	152	18.20%	1,357	87	6.40%	621	29	4.70%	636	82	12.90%
35 to 64 years	343,750	47,806	13.90%	1,910	60	3.10%	1,326	80	6.00%	1,153	20	1.70%	876	34	3.90%	1,642	189	11.50%	2,746	98	3.60%	2,102	62	2.90%	1,072	17	1.60%
65 years and over	180,384	23,287	12.90%	1,182	73	6.20%	627	23	3.70%	499	24	4.80%	490	36	7.30%	808	64	7.90%	1,430	127	8.90%	1,003	178	17.70%	496	18	3.60%
65 years and over	125,793	15,032	11.90%	693	52	7.50%	467	13	2.80%	317	17	5.40%	352	35	9.90%	576	55	9.50%	1,161	124	10.70%	623	140	22.50%	342	18	5.30%
SEX																											
Male	448,190	76,721	17.10%	2,129	176	8.30%	1,707	98	5.70%	1,398	129	9.20%	976	40	4.10%	2,079	356	17.10%	2,898	123	4.20%	2,028	95	4.70%	1,312	25	1.90%
Female	479,738	93,469	19.50%	2,435	309	12.70%	1,539	65	4.20%	1,339	143	10.70%	1,118	91	8.10%	2,115	362	17.10%	3,507	241	6.90%	2,154	193	9.00%	1,078	92	8.50%
RACE AND HISPANIC OR LATINO ORIGIN																											
White alone	529,171	57,835	10.90%	3,904	301	7.70%	3,025	155	5.10%	2,403	155	6.50%	1,599	114	7.10%	3,198	487	15.20%	5,625	169	3.00%	3,536	284	8.00%	1,945	117	6.00%
Black or African American alone	244,386	77,191	31.60%	124	18	14.50%	10	2	20.00%	12	1	8.30%	145	6	4.10%	38	17	44.70%	58	47	81.00%	66	4	6.10%	237	0	0.00%
American Indian and Alaska Native alone	4,933	958	19.40%	0	0 -		15	6	40.00%	17	0	0.00%	8	1	12.50%	0	0 -		46	0	0.00%	24	0	0.00%	52	0	0.00%
Asian alone	41,517	9,568	23.00%	0	0 -		20	0	0.00%	21	12	57.10%	60	4	6.70%	394	162	41.10%	184	6	3.30%	207	0	0.00%	44	0	0.00%
Native Hawaiian and Other Pacific Islander alone	327	12	3.70%	0	0 -		0	0 -		0	0 -		0	0 -		0	0 -		0	0 -		0	0 -		0	0 -	
Some other race alone	60,196	14,502	24.10%	337	41	12.20%	5	0	0.00%	138	104	75.40%	48	0	0.00%	265	0	0.00%	132	0	0.00%	140	0	0.00%	0	0	0.00%
Two or more races	47,398	10,124	21.40%	199	125	62.80%	171	0	0.00%	146	0	0.00%	234	6	2.60%	299	52	17.40%	360	142	39.40%	209	0	0.00%	112	0	0.00%
Hispanic or Latino origin (of any race)	144,222	32,366	22.40%	771	255	33.10%	232	7	3.00%	602	136	22.60%	231	16	6.90%	1,090	92	8.40%	825	16	1.90%	482	85	17.60%	288	14	4.90%
White alone, not Hispanic or Latino	465,330	44,225	9.50%	3,605	212	5.90%	2,930	148	5.10%	2,028	123	6.10%	1,524	98	6.40%	2,473	395	16.00%	4,902	153	3.10%	3,328	199	6.00%	1,732	103	5.90%
EDUCATIONAL ATTAINMENT																											
Population 25 years and over	623,304	88,632	14.20%	3,599	259	7.20%	2,553	123	4.80%	1,888	137	7.30%	1,585	107	6.80%	2,720	359	13.20%	5,031	263	5.20%	3,196	231	7.20%	1,859	117	6.30%
Less than high school graduate	69,451	21,002	30.20%	373	70	18.80%	59	12	20.30%	65	37	56.90%	105	13	12.40%	507	85	16.80%	796	122	15.30%	178	11	6.20%	32	18	56.30%
High school graduate (includes equivalency)	179,716	32,785	18.20%	886	36	4.10%	543	47	8.70%	435	23	5.30%	462	39	8.40%	949	84	8.90%	1,866	92	4.90%	1,227	127	10.40%	524	41	7.80%
Some college, associate's degree	177,224	23,441	13.20%	1,085	90	8.30%	603	36	6.00%	670	63	9.40%	496	33	6.70%	980	182	18.60%	1,091	35	3.20%	848	93	11.00%	734	15	2.00%
Bachelor's degree or higher	196,913	11,404	5.80%	1,255	63	5.00%	1,348	28	2.10%	718	14	1.90%	522	22	4.20%	284	8	2.80%	1,278	14	1.10%	943	0	0.00%	569	43	7.60%
EMPLOYMENT STATUS																											
Civilian labor force 16 years and over	478,751	46,663	9.70%	2,669	164	6.10%	2,100	74	3.50%	1,552	51	3.30%	1,279	76	5.90%	2,042	229	11.20%	3,600	83	2.30%	2,307	29	1.30%	1,594	99	6.20%
Employed	454,170	37,186	8.20%	2,568	154	6.00%	1,981	44	2.20%	1,552	51	3.30%	1,226	76	6.20%	1,957	212	10.80%	3,441	65	1.90%	2,206	29	1.30%	1,550	89	5.70%
Male	227,135	14,827	6.50%	1,175	47	4.00%	997	12	1.20%	817	0	0.00%	517	24	4.60%	1,016	134	13.20%	1,595	41	2.60%	1,087	0	0.00%	889	15	1.70%
Female	227,035	22,359	9.80%	1,393	107	7.70%	984	32	3.30%	735	51	6.90%	709	52	7.30%	941	78	8.30%	1,846	24	1.30%	1,119	29	2.60%	661	74	11.20%
Unemployed	24,581	9,477	38.60%	101	10	9.90%	119	30	25.20%	0	0 -		53	0	0.00%	85	17	20.00%	159	18	11.30%	101	0	0.00%	44	10	22.70%
Male	13,249	4,856	36.70%	75	10	13.30%	98	30	30.60%	0	0 -		53	0	0.00%	25	0	0.00%	69	6	8.70%	101	0	0.00%	44	10	22.70%
Female	11,332	4,621	40.80%	26	0	0.00%	21	0	0.00%	0	0 -		0	0 -		60	17	28.30%	90	12	13.30%	0	0 -		0	0 -	
WORK EXPERIENCE																											
Population 16 years and over	727,539	115,721	15.90%	3,766	276	7.30%	2,746	147	5.40%	2,053	160	7.80%	1,737	122	7.00%	3,284	413	12.60%	5,360	309	5.80%	3,471	231	6.70%	2,083	117	5.60%
Worked full-time, year-round in the past 12 months	326,416	11,066	3.40%	1,777	36	2.00%	1,523	11	0.70%	1,136	25	2.20%	933	31	3.30%	1,275	56	4.40%	2,706	10	0.40%	1,742	0	0.00%	1,084	15	1.40%
Worked part-time or part-year in the past 12 months	171,003	36,374	21.30%	963	118	12.30%	613	53	8.60%	529	26	4.90%	334	45	13.50%	809	173	21.40%	927	70	7.60%	608	29	4.80%	585	74	12.60%
Did not work	230,120	68,281	29.70%	1,026	122	11.90%	610	83	13.60%	388	109	28.10%	470	46	9.80%	1,200	184	15.30%	1,727	229	13.30%	1,121	202	18.00%	414	28	6.80%
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS																											
50 percent of poverty level	75,908 (X)	(X)		130 (X)	(X)		66 (X)	(X)		121 (X)	(X)		37 (X)	(X)		281 (X)	(X)		101 (X)	(X)		64 (X)	(X)		64 (X)	(X)	
125 percent of poverty level	219,368 (X)	(X)		603 (X)	(X)		280 (X)	(X)		310 (X)	(X)		258 (X)	(X)		949 (X)	(X)		650 (X)	(X)		311 (X)	(X)		373 (X)	(X)	
150 percent of poverty level	263,250 (X)																										

APPENDIX B – POPULATION / LANGUAGE DATA
 2020 US Census Bureau, Table S1701, "Poverty Status in the Past 12 Months"

Census Tract 1802, Milwaukee County, Wisconsin Total Estimate	Census Tract 1802, Milwaukee County, Wisconsin Total Estimate			Census Tract 1803, Milwaukee County, Wisconsin Total Estimate			Census Tract 1805, Milwaukee County, Wisconsin Total Estimate			Census Tract 1852, Milwaukee County, Wisconsin Area Total Estimate			Milwaukee-Waukesha, WI Metro Area Below poverty level Estimate	
	Count	Percent	Poverty level	Count	Percent	Poverty level	Count	Percent	Poverty level	Count	Percent	Poverty level	Count	Percent
5,037	494	9.80%	3,275	236	7.20%	4,411	281	6.40%	4,777	434	9.10%	1,547,175	201,098	13.00%
832	152	18.30%	834	32	3.80%	326	49	15.00%	484	85	17.60%	357,790	67,023	18.70%
159	22	13.80%	294	0	0.00%	56	12	21.40%	230	45	19.60%	96,018	20,414	21.30%
673	130	19.30%	540	32	5.90%	270	37	13.70%	254	40	15.70%	261,772	46,609	17.80%
832	152	18.30%	834	32	3.80%	326	49	15.00%	444	45	10.10%	356,431	65,718	18.40%
3,377	202	6.00%	2,101	195	9.30%	2,573	174	6.80%	3,396	292	8.60%	948,613	113,027	11.90%
1,283	92	7.20%	754	124	16.40%	570	20	3.50%	1,350	76	5.60%	344,417	55,768	16.20%
2,094	110	5.30%	1,347	71	5.30%	2,003	154	7.70%	2,046	216	10.60%	604,196	57,259	9.50%
1,295	185	14.30%	492	11	2.20%	1,912	93	4.90%	1,525	87	5.70%	340,396	31,324	9.20%
828	140	16.90%	340	9	2.60%	1,512	58	3.80%	897	57	6.40%	240,772	21,048	8.70%
2,338	161	6.90%	1,683	138	8.20%	1,959	77	3.90%	2,330	110	4.70%	753,734	89,610	11.90%
2,699	333	12.30%	1,592	98	6.20%	2,452	204	8.30%	2,447	324	13.20%	793,441	111,488	14.10%
4,613	339	7.30%	2,920	69	2.40%	4,084	241	5.90%	4,025	430	10.70%	1,097,862	84,819	7.70%
207	124	59.90%	38	38	100.00%	40	0	0.00%	138	4	2.90%	253,278	78,653	31.10%
0	0 -		9	0	0.00%	10	0	0.00%	0	0 -		6,218	1,133	18.20%
39	16	41.00%	13	0	0.00%	75	0	0.00%	88	0	0.00%	60,285	10,133	16.80%
0	0 -		0	0 -		0	0 -		0	0 -		529	58	11.00%
0	0 -		125	95	76.00%	15	0	0.00%	391	0	0.00%	67,206	15,054	22.40%
178	15	8.40%	170	34	20.00%	187	40	21.40%	135	0	0.00%	61,797	11,248	18.20%
364	0	0.00%	573	134	23.40%	311	0	0.00%	659	14	2.10%	170,623	35,742	20.90%
4,313	339	7.90%	2,571	64	2.50%	3,922	241	6.10%	3,830	416	10.90%	1,017,313	68,846	6.80%
3,919	271	6.90%	2,143	114	5.30%	3,943	222	5.60%	3,850	315	8.20%	1,063,236	107,844	10.10%
96	25	26.00%	120	19	15.80%	249	102	41.00%	197	70	35.50%	86,408	23,465	27.20%
1,472	68	4.60%	794	15	1.90%	1,709	71	4.20%	1,394	122	8.80%	281,511	39,379	14.00%
1,077	121	11.20%	838	64	7.60%	1,087	28	2.60%	1,242	123	9.90%	308,775	29,465	9.50%
1,274	57	4.50%	391	16	4.10%	898	21	2.30%	1,017	0	0.00%	386,542	15,535	4.00%
2,994	91	3.00%	1,683	106	6.30%	2,407	130	5.40%	2,733	151	5.50%	823,626	56,607	6.90%
2,994	91	3.00%	1,592	68	4.30%	2,335	126	5.40%	2,733	151	5.50%	788,816	45,504	5.80%
1,342	17	1.30%	889	45	5.10%	1,075	22	2.00%	1,467	51	3.50%	402,793	18,199	4.50%
1,652	74	4.50%	703	23	3.30%	1,260	104	8.30%	1,266	100	7.90%	386,023	27,305	7.10%
0	0 -		91	38	41.80%	72	4	5.60%	0	0 -		34,810	11,103	31.90%
0	0 -		17	0	0.00%	51	0	0.00%	0	0 -		19,657	5,833	29.70%
0	0 -		74	38	51.40%	21	4	19.00%	0	0 -		15,153	5,270	34.80%
4,308	385	8.90%	2,483	207	8.30%	4,136	249	6.00%	4,425	389	8.80%	1,231,240	139,785	11.40%
2,209	26	1.20%	1,246	4	0.30%	1,750	32	1.80%	2,133	36	1.70%	564,967	12,886	2.30%
935	96	10.30%	410	76	18.50%	777	94	12.10%	893	129	14.40%	295,794	44,998	15.20%
1,164	263	22.60%	827	127	15.40%	1,609	123	7.60%	1,399	224	16.00%	370,479	81,901	22.10%
231 (X)	(X)		170 (X)	(X)		64 (X)	(X)		149 (X)	(X)		90,575 (X)	(X)	
662 (X)	(X)		523 (X)	(X)		374 (X)	(X)		575 (X)	(X)		262,221 (X)	(X)	
753 (X)	(X)		540 (X)	(X)		554 (X)	(X)		780 (X)	(X)		317,847 (X)	(X)	
1,174 (X)	(X)		1,171 (X)	(X)		669 (X)	(X)		1,098 (X)	(X)		401,189 (X)	(X)	
1,384 (X)	(X)		1,225 (X)	(X)		905 (X)	(X)		1,200 (X)	(X)		439,136 (X)	(X)	
2,664 (X)	(X)		1,929 (X)	(X)		1,531 (X)	(X)		1,893 (X)	(X)		665,615 (X)	(X)	
3,319 (X)	(X)		2,379 (X)	(X)		2,329 (X)	(X)		2,597 (X)	(X)		879,843 (X)	(X)	
4,019 (X)	(X)		2,628 (X)	(X)		2,961 (X)	(X)		3,141 (X)	(X)		1,062,328 (X)	(X)	
1,625	252	15.50%	689	175	25.40%	1,712	153	8.90%	1,572	267	17.00%	345,627	78,137	22.60%
866	102	11.80%	324	107	33.00%	687	23	3.30%	766	95	12.40%	167,213	36,108	21.60%
759	150	19.80%	365	68	18.60%	1,025	130	12.70%	806	172	21.30%	178,414	42,029	23.60%
0	0 -		0	0 -		0	0 -		0	0 -		334	334	100.00%
0	0 -		0	0 -		0	0 -		40	100.00%		922	912	98.90%
157	71	45.20%	186	90	48.40%	13	0	0.00%	148	20	13.50%	36,370	16,562	45.50%
522	0	0.00%	101	13	12.90%	251	0	0.00%	391	0	0.00%	78,780	13,198	16.80%
230	0	0.00%	65	23	35.40%	276	101	36.60%	147	14	9.50%	38,950	7,019	18.00%
144	3	2.10%	107	2	1.90%	104	0	0.00%	315	94	29.80%	44,168	9,886	22.40%
218	51	23.40%	114	38	33.30%	226	9	4.00%	216	72	33.30%	57,168	14,767	25.80%
219	105	47.90%	37	0	0.00%	272	18	6.60%	168	0	0.00%	44,788	8,682	19.40%
135	22	16.30%	79	9	11.40%	570	25	4.40%	147	27	18.40%	44,147	6,777	15.40%
5,663 (X)	(X)		8,635 (X)	(X)	N	(X)	(X)		7,823 (X)	(X)		7,199 (X)	(X)	
774	26	3.40%	322	4	1.20%	696	0	0.00%	819	0	0.00%	154,914	4,311	2.80%
400	64	16.00%	130	64	49.20%	305	57	18.70%	239	87	36.40%	72,254	24,698	34.20%
451	162	35.90%	237	107	45.10%	711	96	13.50%	514	180	35.00%	118,459	49,128	41.50%

APPENDIX B – POPULATION / LANGUAGE DATA
2015 US Census Bureau, Table B16001, "Language Spoken at Home by Ability to Speak English"

Label (Grouping)	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census	Census							
	Tract 207, Milwaukee County, Wisconsin	Tract 208, Milwaukee County, Wisconsin	Tract 209, Milwaukee County, Wisconsin	Tract 210, Milwaukee County, Wisconsin	Tract 216, Milwaukee County, Wisconsin	Tract 217, Milwaukee County, Wisconsin	Tract 1601, Milwaukee County, Wisconsin	Tract 1802, Milwaukee County, Wisconsin	Tract 1803, Milwaukee County, Wisconsin	Tract 1805, Milwaukee County, Wisconsin	Tract 1852, Milwaukee County, Wisconsin														
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate						
Total:	3,895 ±244	2,921 ±217	2,563 ±171	2,217 ±127	4,167 ±351	6,457 ±541	6,153 ±280	4,355 ±342	3,056 ±211	4,152 ±283	4,618 ±325	1,468,278 ±93													
Speak only English	3,571 ±247	2,736 ±227	2,293 ±165	1,912 ±140	2,647 ±276	4,608 ±450	5,344 ±325	3,782 ±462	2,580 ±211	3,420 ±283	4,234 ±408	1,284,486 ±2,679													
Spanish or Spanish Creole:	139 ±82	103 ±70	234 ±128	226 ±102	679 ±318	962 ±377	260 ±287	226 ±213	211 ±113	168 ±142	242 ±127	105,661 ±1,747													
Speak English "very well"	102 ±55	83 ±61	193 ±122	168 ±74	395 ±179	620 ±237	34 ±38	182 ±191	196 ±110	130 ±131	194 ±102	61,169 ±1,606													
Speak English less than "very well"	37 ±38	20 ±21	41 ±31	58 ±41	284 ±222	342 ±201	226 ±289	44 ±52	15 ±28	38 ±44	48 ±46	44,492 ±1,359													
French (incl. Patois, Cajun):	35 ±45	1 ±2	0 ±9	7 ±10	8 ±13	0 ±12	11 ±16	13 ±21	0 ±9	35 ±43	0 ±12	3,715 ±381													
Speak English "very well"	35 ±45	1 ±2	0 ±9	7 ±10	8 ±13	0 ±12	11 ±16	13 ±21	0 ±9	25 ±39	0 ±12	3,246 ±360													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	10 ±17	0 ±12	469 ±113													
French Creole:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	70 ±58													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	63 ±56													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	7 ±8													
Italian:	0 ±9	0 ±9	0 ±9	0 ±9	8 ±12	2 ±5	0 ±12	0 ±9	7 ±11	9 ±15	0 ±12	1,808 ±319													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	8 ±12	2 ±5	0 ±12	0 ±9	7 ±11	9 ±15	0 ±12	1,301 ±233													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	507 ±151													
Portuguese or Portuguese Creole:	0 ±9	22 ±36	0 ±9	0 ±9	0 ±9	19 ±30	0 ±12	2 ±4	0 ±9	784 ±289	0 ±12														
Speak English "very well"	0 ±9	22 ±36	0 ±9	0 ±9	0 ±9	19 ±30	0 ±12	2 ±4	0 ±9	566 ±212	0 ±12														
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	218 ±116	0 ±12														
German:	16 ±20	9 ±15	0 ±9	18 ±18	18 ±29	62 ±66	27 ±31	160 ±198	0 ±9	11 ±18	0 ±12	9,186 ±538													
Speak English "very well"	16 ±20	9 ±15	0 ±9	18 ±18	18 ±29	48 ±63	27 ±31	160 ±198	0 ±9	11 ±18	0 ±12	7,583 ±521													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	14 ±22	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	1,603 ±224													
Yiddish:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	97 ±68													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	91 ±68													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	6 ±8													
Other West Germanic languages:	8 ±13	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	472 ±268													
Speak English "very well"	8 ±13	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	434 ±224													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	38 ±49													
Scandinavian languages:	9 ±15	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	637 ±190													
Speak English "very well"	9 ±15	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	604 ±179													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	33 ±29													
Greek:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	14 ±22	0 ±9	0 ±12	1,089 ±228													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	14 ±22	0 ±9	0 ±12	832 ±177													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	257 ±102													
Russian:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	26 ±41	38 ±62	0 ±9	0 ±9	0 ±12	2,961 ±448													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	38 ±62	0 ±9	0 ±9	0 ±12	1,233 ±254													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	26 ±41	0 ±9	0 ±9	0 ±9	0 ±12	1,728 ±339													
Polish:	43 ±41	0 ±9	18 ±21	6 ±10	0 ±9	50 ±59	43 ±70	0 ±9	0 ±9	0 ±9	0 ±12	2,598 ±395													
Speak English "very well"	43 ±41	0 ±9	5 ±7	6 ±10	0 ±9	50 ±59	43 ±70	0 ±9	0 ±9	0 ±9	0 ±12	1,935 ±310													
Speak English less than "very well"	0 ±9	0 ±9	13 ±20	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	663 ±209													
Serbo-Croatian:	21 ±31	1 ±2	0 ±9	0 ±9	24 ±40	17 ±27	15 ±25	13 ±21	55 ±71	9 ±14	0 ±12	3,023 ±588													
Speak English "very well"	8 ±13	0 ±9	0 ±9	0 ±9	24 ±40	17 ±27	15 ±25	13 ±21	29 ±47	9 ±14	0 ±12	1,927 ±410													
Speak English less than "very well"	13 ±18	1 ±2	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	26 ±30	0 ±9	0 ±12	1,096 ±284													
Other Slavic languages:	10 ±15	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	6 ±10	0 ±9	0 ±12	903 ±236													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	6 ±10	0 ±9	0 ±12	585 ±159													
Speak English less than "very well"	10 ±15	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	318 ±117													
Armenian:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	5 ±10	0 ±12	0 ±12	97 ±68													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	5 ±10	0 ±12	0 ±12	89 ±72													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	8 ±12													
Persian:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	349 ±144													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	171 ±85													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	178 ±88													
Gujarati:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	654 ±269													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	399 ±167													
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	255 ±135													
Hindi:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	137 ±216	0 ±9	0 ±9	0 ±9	0 ±12	3,333 ±524													
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	2,544 ±408													
Speak English less than "very well"	0 ±9</																								

APPENDIX B – POPULATION / LANGUAGE DATA
2015 US Census Bureau, Table B16001, "Language Spoken at Home by Ability to Speak English"

Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	1,739 ±419
Speak English less than "very well"	30 ±45	0 ±9	0 ±9	0 ±9	0 ±9	270 ±427	83 ±140	0 ±9	0 ±9	0 ±9	0 ±12	1,249 ±450
Other Indo-European languages:	0 ±9	0 ±9	0 ±9	0 ±9	10 ±18	118 ±186	151 ±175	38 ±60	139 ±160	260 ±177	0 ±12	2,223 ±501
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	35 ±55	48 ±81	19 ±30	94 ±115	120 ±97	0 ±12	1,401 ±315
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	10 ±18	83 ±131	103 ±124	19 ±30	45 ±49	140 ±129	0 ±12	822 ±288
Chinese:	0 ±9	0 ±9	0 ±9	22 ±30	0 ±9	0 ±12	42 ±65	0 ±9	0 ±9	0 ±9	13 ±21	5,131 ±738
Speak English "very well"	0 ±9	0 ±9	0 ±9	6 ±8	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	2,334 ±367
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	16 ±21	0 ±9	0 ±12	42 ±65	0 ±9	0 ±9	0 ±9	13 ±21	2,797 ±549
Japanese:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	14 ±22	0 ±12	0 ±9	0 ±9	6 ±10	0 ±12	402 ±118
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	6 ±10	0 ±12	238 ±90
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	14 ±22	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	164 ±84
Korean:	0 ±9	0 ±9	0 ±9	0 ±9	66 ±106	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	46 ±85	1,037 ±321
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	42 ±68	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	20 ±37	560 ±203
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	24 ±37	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	26 ±49	477 ±166
Mon-Khmer, Cambodian:	13 ±19	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	30 ±30
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	17 ±24
Speak English less than "very well"	13 ±19	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	13 ±19
Hmong:	0 ±9	0 ±9	18 ±28	0 ±9	12 ±21	16 ±26	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	11,374 ±985
Speak English "very well"	0 ±9	0 ±9	18 ±28	0 ±9	12 ±21	16 ±26	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	6,969 ±741
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	4,405 ±525
Thai:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	421 ±138
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	202 ±93
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	219 ±78
Laotian:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	1,267 ±443
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	491 ±305
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	776 ±263
Vietnamese:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	2,250 ±555
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	974 ±281
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	1,276 ±369
Other Asian languages:	0 ±9	0 ±9	0 ±9	0 ±9	136 ±186	0 ±12	14 ±22	0 ±9	0 ±9	0 ±9	0 ±12	5,140 ±756
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	14 ±22	0 ±9	0 ±9	0 ±9	0 ±12	3,113 ±520
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	136 ±186	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	2,027 ±505
Tagalog:	0 ±9	49 ±56	0 ±9	0 ±9	0 ±9	27 ±41	0 ±12	77 ±82	10 ±15	24 ±42	39 ±61	1,919 ±367
Speak English "very well"	0 ±9	49 ±56	0 ±9	0 ±9	0 ±9	27 ±41	0 ±12	50 ±49	10 ±15	24 ±42	0 ±12	1,367 ±308
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	27 ±40	0 ±9	0 ±9	39 ±61	552 ±160
Other Pacific Island languages:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	302 ±165
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	228 ±131
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	74 ±73
Navajo:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	23 ±27
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	16 ±24
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	7 ±11
Other Native North American languages:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	466 ±208
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	400 ±189
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	66 ±80
Hungarian:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	6 ±12	0 ±9	0 ±9	0 ±12	291 ±121
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	6 ±12	0 ±9	0 ±9	0 ±12	231 ±105
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	60 ±41
Arabic:	0 ±9	0 ±9	0 ±9	26 ±38	559 ±226	292 ±284	0 ±12	0 ±9	34 ±50	205 ±117	44 ±76	5,327 ±865
Speak English "very well"	0 ±9	0 ±9	0 ±9	7 ±10	121 ±74	200 ±206	0 ±12	0 ±9	25 ±37	97 ±60	0 ±12	3,081 ±588
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	19 ±29	438 ±244	92 ±103	0 ±12	0 ±9	9 ±13	108 ±59	44 ±76	2,246 ±480
Hebrew:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	338 ±150
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	325 ±150
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	13 ±15
African languages:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	2,870 ±592
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	2,076 ±472
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	794 ±212
Other and unspecified languages:	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	355 ±222
Speak English "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	157 ±90
Speak English less than "very well"	0 ±9	0 ±9	0 ±9	0 ±9	0 ±9	0 ±12	0 ±12	0 ±9	0 ±9	0 ±9	0 ±12	198 ±167

Appendix C Community Participation Plan

Milwaukee County Airport Division Sponsor Community Participation Plan (CPP)¹

Milwaukee Mitchell International Airport

1. Administration

The purpose of this CPP is to ensure that stakeholders or communities affected² Milwaukee County Airport Division (Airport Division) projects or operations can be informed and participate and have their input thoughtfully considered in the key stages during airport planning efforts, regardless of their race, color, national origin, sex, sexual orientation, gender identity, creed, age, or disability (hereafter, the “protected bases”). This plan is provided in accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and related authorities.³ This plan and associated reports regarding our CPP efforts will be communicated to the public in formats accessible to persons with disabilities and to limited English proficient (LEP) individuals.

The individuals primarily responsible for implementing the Airport Division’s MKE CPP are:

Responsible Official	Title, Office, and Responsibilities
1. David Gelting	ADA/Title VI Coordinator
2. Christine Turk	Airport Planning Manager
3. Harold Mester	Director of Public Affairs and Marketing
4. Christie Green	Marketing Coordinator

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

Website, In-person, and Other Communication Methods

1. Airport website: https://www.mitchellairport.com/airport-guide/accessibility-information
2. Via Airport email at info@mitchellairport.com
3. In person at 5300 S. Howell Avenue Milwaukee WI 53207

In addition, the Airport Division will ensure that members of the public are advised of our nondiscrimination obligations. This includes how to file discrimination complaints with the Airport Division and the FAA. We will also conspicuously display the FAA-provided Unlawful Discrimination Posters at airport facilities. See Notice section of Airport Division’s Title VI Plan. The Airport Division also makes this CPP available through the following methods when

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

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

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

engaging members of the public concerning planning efforts:

Website, In-person, and Other Distribution Methods

- | |
|---|
| 1. Airport website: https://www.mitchellairport.com/airport-guide/accessibility-information |
| 2. Via Airport email at info@mitchellairport.com |
| 3. In person at 5300 S. Howell Avenue Milwaukee WI 53207 |

2. Goals and Objectives

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

The Airport Division’s planning processes that lead to decisions for projects or operations are:

Planning Processes

- | |
|---|
| 1. Capital Improvement Program (CIP) Projects |
| 2. Projects requiring and Environmental Assessment (EA) or Environmental Impact Statement (EIS) |
| 3. Airfield Projects |
| 4. Master Plans |
| 5. ADA Self Evaluation & Transition Plans |

The Airport Division seeks public input for the above processes through the following methods:

Public Input Methods	Planning Process(es) that use each Method
A. Public Hearings ⁴	# 1, 2, 3, 4
B. Community Meetings	# 2, 4
C. Direct Mailings	# 4
D. Email newsletter	# 3
E. County Board of Supervisors Meetings	# 1, 2, 3, 4
F. Committee on Transportation and Transit Public Meetings	# 1, 2, 3, 4
G. Project-Specific Website	# 4
H. Social Media	# 1, 2, 3, 4, 5
I. Online surveys	# 5

⁴ For projects that receive State or Federal funding.

3. Identification of and Focused Outreach to Affected Communities

See Community Statistics section of the Airport Division's Title VI Plan, for detailed discussion of Affected Communities.

The specific steps the Airport Division will take to communicate with, inform, educate, consult or solicit input from, and expand opportunities for engagement with each Affected Community,⁵ are provided below.

⁵ "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.

Affected Community	Key Community Reps. (CBOs, leaders, etc.)	Focused Outreach Steps
<p>Low Income Populations in the Following Communities: While the poverty levels within MKE's Affected Communities vary, the poverty levels within the Affected Communities are not meaningfully greater than the Airport's Surrounding Community. As such, no low-income Communities of Concern are found.</p>	<ul style="list-style-type: none"> • Dale Kooyenga, President, Metropolitan Milwaukee Association of Commerce (MMAC) • Peggy Williams-Smith, President & CEO, Visit Milwaukee • Priscilla E. Coggs-Jones, Chair, Transportation & Transit Committee, Milwaukee County Board of Supervisors • Ryan Clancy, 4th District Representative, Milwaukee County Board of Supervisors • David Crowley, Milwaukee County Executive • Scott Spiker, City of Milwaukee 13th District Alderperson • Lief Otteson, Executive Director, Gateway to Milwaukee Business Improvement District • Thomas Pavlic, Mayor, City of Cudahy • Jim Shelenske, Mayor, City of South Milwaukee • Daniel Bukiewicz, Mayor, City of Oak Creek • Cavalier Johnson, Mayor, City of Milwaukee • Dr. Keith Posley, Superintendent, Milwaukee Public Schools • Mike Bonk, Director, Milwaukee County Office for Persons with Disabilities • Donna Brown-Martin, Director, Milwaukee County Department of Transportation • Dr. Eve M. Hall, President & CEO, Milwaukee Urban League • Mary McCormick, Executive Director, Milwaukee Rotary Club • Sarah Grammar, Director, University of Wisconsin Osher Lifelong Learning Institute • Joan Kelnhofer, Southeastern Wisconsin Chapter President, Women in Aviation 	<ul style="list-style-type: none"> a. Airfield Update Newsletter b. Airport Newsletter c. Social Media Postings d. Traditional Media Outreach/Press Conferences e. Website Postings f. Direct mailing postcards to surrounding communities (for airport Master Plan projects) g. Airport content is provided to County Supervisors & the County Executive to include in their constituent mailings and their social media accounts. h. Presentations at the Milwaukee County Board Committee on Transportation and Transit i. Attendance at Job Fairs j. Community Events k. Public Hearings, advertised in local media and held at the airport. l. Attendance at Community Meetings m. ACE Program - 6-week program where 30 Milwaukee Public School summer interns rotate through the Airport Division n. Annual Girls in Aviation Event o. Upcoming project opportunity notifications

Affected Community	Key Community Reps. (CBOs, leaders, etc.)	Focused Outreach Steps
Racial and Ethnic Communities: Census 216	<ul style="list-style-type: none"> • Dale Kooyenga, President, Metropolitan Milwaukee Association of Commerce (MMAC) • Peggy Williams-Smith, President & CEO, Visit Milwaukee • Priscilla E. Coggs-Jones, Chair, Transportation & Transit Committee, Milwaukee County Board of Supervisors • Ryan Clancy, 4th District Representative, Milwaukee County Board of Supervisors • David Crowley, Milwaukee County Executive • Scott Spiker, City of Milwaukee 13th District Alderperson • Lief Otteson, Executive Director, Gateway to Milwaukee Business Improvement District • Thomas Pavlic, Mayor, City of Cudahy • Jim Shelenske, Mayor, City of South Milwaukee • Daniel Bukiewicz, Mayor, City of Oak Creek • Cavalier Johnson, Mayor, City of Milwaukee • Dr. Keith Posley, Superintendent, Milwaukee Public Schools • Mike Bonk, Director, Milwaukee County Office for Persons with Disabilities • Donna Brown-Martin, Director, Milwaukee County Department of Transportation • Dr. Eve M. Hall, President & CEO, Milwaukee Urban League • Mary McCormick, Executive Director, Milwaukee Rotary Club • Sarah Grammar, Director, University of Wisconsin Osher Lifelong Learning Institute • Joan Kelnhofer, Southeastern Wisconsin Chapter President, Women in Aviation • 	<ul style="list-style-type: none"> a. Airfield Update Newsletter b. Airport Newsletter c. Social Media Postings d. Traditional Media Outreach/Press Conferences e. Website Postings f. Direct mailing postcards to surrounding communities (for airport Master Plan projects) g. Airport content is provided to County Supervisors & the County Executive to include in their constituent mailings and their social media accounts. h. Presentations at the Milwaukee County Board Committee on Transportation and Transit i. Attendance at Job Fairs j. Community Events k. Public Hearings, advertised in local media and held at the airport. l. Attendance at Community Meetings m. ACE Program - 6-week program where 30 Milwaukee Public School summer interns rotate through the Airport Division n. Annual Girls in Aviation Event o. Upcoming project opportunity notifications

Affected Community	Key Community Reps. (CBOs, leaders, etc.)	Focused Outreach Steps
Limited English Proficiency: Census Tract 216	<ul style="list-style-type: none"> • Dale Kooyenga, President, Metropolitan Milwaukee Association of Commerce (MMAC) • Peggy Williams-Smith, President & CEO, Visit Milwaukee • Priscilla E. Coggs-Jones, Chair, Transportation & Transit Committee, Milwaukee County Board of Supervisors • Ryan Clancy, 4th District Representative, Milwaukee County Board of Supervisors • David Crowley, Milwaukee County Executive • Scott Spiker, City of Milwaukee 13th District Alderperson • Lief Otteson, Executive Director, Gateway to Milwaukee Business Improvement District • Thomas Pavlic, Mayor, City of Cudahy • Jim Shelenske, Mayor, City of South Milwaukee • Daniel Bukiewicz, Mayor, City of Oak Creek • Cavalier Johnson, Mayor, City of Milwaukee • Dr. Keith Posley, Superintendent, Milwaukee Public Schools • Mike Bonk, Director, Milwaukee County Office for Persons with Disabilities • Donna Brown-Martin, Director, Milwaukee County Department of Transportation • Dr. Eve M. Hall, President & CEO, Milwaukee Urban League • Mary McCormick, Executive Director, Milwaukee Rotary Club • Sarah Grammar, Director, University of Wisconsin Osher Lifelong Learning Institute • Joan Kelnhofer, Southeastern Wisconsin Chapter President, Women in Aviation 	<ul style="list-style-type: none"> a. Airfield Update Newsletter b. Airport Newsletter c. Social Media Postings d. Traditional Media Outreach/Press Conferences e. Website Postings f. Direct mailing postcards to surrounding communities (for airport Master Plan projects) g. Airport content is provided to County Supervisors & the County Executive to include in their constituent mailings and their social media accounts. h. Presentations at the Milwaukee County Board Committee on Transportation and Transit i. Attendance at Job Fairs j. Community Events k. Public Hearings, advertised in local media and held at the airport. l. Attendance at Community Meetings m. Upcoming project opportunity notifications

4. Effective Communication

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

5. Communication Platforms

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

Social Media, Monitors, and Other Communication Platforms

1. Social Media Platforms
2. Newsletters / Eblasts
3. Media Outreach
4. Public Hearing
5. Milwaukee County Board of Supervisors Notifications
6. Airfield Update Newsletter
7. Milwaukee County Executive Office Notifications
8. Letters/Postcards
9. Certified Firms Directory
10. Career Fairs
11. Community Meetings
12. Flyers/Transit Ads
13. MKE Airport Website
14. Milwaukee County Website
15. Customer Service (via phone, email, in-person at the info desk)
16. Surveys
17. Local news media outreach

6. Records

This section includes the procedures the Airport Division will follow to document outreach efforts. Records for steps taken to **provide outreach to Affected Communities** and for **community input** will be maintained. The community input records will document how the Airport Division considered, weighed, and incorporated input received; these records will include justifications for any decisions contrary to community feedback.

Both the outreach to Affected Communities and community input records will be stored in the following locations:

Website, In-person, and Other Storage Methods

1. **Airport's Intranet** in the designated folder "shared/007.2-compliance"
2. **Airport Website** at www.mitchellairport.com (when applicable)

Records for demographics of participants will also be kept. Requested demographic information will include race, national origin, sexual orientation, gender identity, creed, age, disability, languages spoken, and community membership.⁶ Demographic information will be requested by the following methods:

Demographic Information Collection Methods

1. Voluntary disclosure by attendees on sign-in sheets
2. Disclosures from businesses contracting with Milwaukee County
3. Voluntary disclosure of all Milwaukee County employees, including Airport Division employees and Milwaukee County elected officials, is publicly available online at: <https://county.milwaukee.gov/EN/Vision/Strategy-Dashboard/Workforce-Data>
4. Voluntary disclosure by attendees at event registration

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

⁶ This information is solicited to demonstrate compliance with Title VI and related requirements. See 49 CFR § 21.9(b); 49 U.S.C. § 47123; 28 CFR § 42.406; and FAA Order 1400.11.

7. Reporting Outcomes

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

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

The CPP Reports will be included with the Airport Division's Title VI Plan. If no current Title VI Plan exists, the CPP Reports will be added to its Title VI Assessment for each grant.