



# San Francisco International Airport Title VI Plan

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

The San Francisco International Airport (Airport or SFO) 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 (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.

SFO further assures that every effort will be made to ensure non-discrimination in all of its programs and activities, regardless of whether those programs or activities are federally funded. The Airport agrees, among other things, to undertake an assessment of the community demographics surrounding SFO or in its flight path; to better understand the needs of airport guests; and to involve those communities potentially impacted by SFO's programs and activities in its decision-making processes to the extent possible.

Moreover, SFO requires non-discrimination 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 are included in related lease, contract, or franchise agreements between SFO and corresponding tenants, contractors, and concessionaires, and are generally applicable to similar agreements with their own sub-tenants and sub-contractors.

The Airport's Office of Diversity, Equity, and Inclusion, available at (650) 821-3596 and [SFO-TitleVICoordinator@flysfo.com](mailto:SFO-TitleVICoordinator@flysfo.com), is responsible for overseeing SFO's Title VI compliance and is the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

  
\_\_\_\_\_  
**Signature**  
**Airport Director**

  
\_\_\_\_\_  
**Effective Date<sup>2</sup>**

<sup>1</sup> This policy statement will be translated into Spanish, Tagalog, and Chinese upon final adoption.

<sup>2</sup> The Airport's Title VI Plan remains effective for three years following its adoption date.

## 2. Administration

SFO has developed this Title VI Plan (Plan) in accordance with FAA requirements. This Plan will be updated no less than once every three (3) years, or as required due to Airport policy revisions or updates to federal guidelines. Significant revisions to the Plan may warrant resubmittal to the FAA for approval, but the Plan will not be re-adopted due to minor changes.

In addition to the Title VI Coordinator and SFO leadership, the following Airport work sections or divisions support SFO's Title VI Program requirements:

| <b>Staff Supporting Title VI Program</b>       | <b>Work Section or Division</b>            |
|------------------------------------------------|--------------------------------------------|
| Director of Diversity, Equity and Inclusion    | Office of Diversity, Equity, and Inclusion |
| Director of Landside Operations                | Landside Operations                        |
| Director of Marketing and Communications       | Marketing and Communications               |
| Director of Project Management                 | Project Management Office                  |
| Director of Revenue Development and Management | Revenue Development and Management         |
| Director of Customer Care                      | Customer Care Office                       |
| Director of Contracts Administration           | Contracts Administration Unit              |
| Director of Commission Affairs                 | Office of the Commission Secretary         |
| Planning and Environmental Affairs Director    | Airport and Environmental Planning         |
| Director of Social Responsibility              | Economic and Community Development         |
| Capital Finance Director                       | Finance                                    |
| Director of Procurement and Contracts          | Project and Contract Management            |

### Applications for Federal Financial Assistance

The chart below summarizes all active and pending grants with the FAA as of the effective date of this Plan:

| <b>Airport Improvement Program Grant No.</b> | <b>Grant Amount</b> |
|----------------------------------------------|---------------------|
| <b>3-06-0221-069-2019</b>                    | \$ 10,217,575       |
| <b>3-06-0221-070-2019</b>                    | \$ 6,636,562        |
| <b>3-06-0221-071-2019</b>                    | \$ 7,109,477        |
| <b>3-06-0221-072-2020</b>                    | \$ 9,288,000        |
| <b>3-06-0221-073-2020</b>                    | \$ 3,221,631        |
| <b>3-06-0221-075-2021</b>                    | \$ 9,504,989        |
| <b>3-06-0221-078-2021</b>                    | \$ 39,018,496       |

|                                                        |                |
|--------------------------------------------------------|----------------|
| 3-06-0221-079-2021                                     | \$ 169,014,943 |
|                                                        |                |
| 3-06-0221-082-2022                                     | \$ 96,063      |
|                                                        |                |
| 3-06-0221-084-2022                                     | \$ 27,987,613  |
|                                                        |                |
| 3-06-0221-086-2022                                     | \$ 9,600,000   |
|                                                        |                |
| 3-06-0221-088-2023 (BIL Airport Infrastructure Grants) | \$ 11,572,852  |
|                                                        |                |
| 3-06-0221-090-2023 (BIL Airport Terminal Program)      | \$ 31,000,000  |
|                                                        |                |
| TBD (2022 Supplemental Appropriation)                  | \$ 2,100,000   |

As of the date of this Plan, SFO does not have any pending grant applications with federal agencies other than the FAA. Should this change, the Airport will disclose relevant information on subsequent grant applications.

### 3. Grant and Procurement Assurances

SFO includes standard grant assurances for Title VI and related requirements in all DOT-assisted contracts and their administration, in the form prescribed by the FAA.

#### Title VI Provisions in Solicitations

SFO incorporates the mandatory Title VI solicitation notice language in all of its solicitation documents. These provisions are also applicable to subcontracts and sub-agreements, and contractors are advised of this requirement.

#### Required Title VI Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments must contain the contractual requirements and clauses, in the form prescribed by FAA. See [https://www.faa.gov/airports/aip/procurement/federal\\_contract\\_provisions/](https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/).
- b. Civil Rights clauses are included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

## Title VI List of Pertinent Non-discrimination Acts and Authorities

Additionally, the required General Civil Rights Provisions found in FAA's Non-discrimination statute (49 USC § 47123) and Title VI Pertinent Non-discrimination Acts and Authorities are included in all professional services and construction contracts, regardless of funding source. See [https://www.faa.gov/airports/aip/grant\\_assurances/#current-assurances](https://www.faa.gov/airports/aip/grant_assurances/#current-assurances).

SFO will include the requirements in updated template language for all construction contracts, regardless of funding source. A template for construction contracts will require that all bidders/proposers certify they have received notice, and will comply with the requirements in all subcontracts and "flow down" to additional subcontracts of any tier.

SFO will also comply with any federal oversight requirements pertaining to subcontracts.

## Disadvantaged Business Enterprise Programs

SFO administers a robust Airport Concession Disadvantaged Business Enterprise (ACDBE) Program and Disadvantaged Business Enterprise (DBE) Program in accordance with DOT Title 49 CFR Part 23 and CFR Part 26, *Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs*. The ACDBE and DBE Programs support the administration of Title VI non-discrimination requirements by fostering equal opportunity in DOT-assisted contracts.<sup>3</sup>

The Airport provides ACDBE and DBE certification services and technical assistance for small businesses (that are at least 51% owned or controlled by one or more socially and economically disadvantaged individuals<sup>4</sup>) to submit proposals or bid on DOT-funded contracts at SFO. SFO's policy statement for its DBE Program includes non-discrimination commitments in the bidding/solicitation, selection, award, and administration of DOT-assisted contracts and is available for public access on the Airport's website ([www.flysfo.com](http://www.flysfo.com)).

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<sup>3</sup> The Airport has established overall ACDBE participation goals based on two types of concessions: (1) non-car rental related, including food/beverage, retail, duty-free/duty-paid luxury goods, and passenger service concessions, and (2) car rental-related concessions, including purchases/leases of vehicles from vendors certified as ACDBE.

<sup>4</sup> Individual determinations of social and economic disadvantage can be found under 49 CFR, Part 26, Appendix E. **Socially disadvantaged** includes the following demographics: Women, Black Americans, Hispanic Americans, Native Americans, Asian-Pacific Americans, & Subcontinent Asian Americans, Other (as designated by Small Business Administration (SBA), or individual showing).

**Economically disadvantaged** refers to a personal net worth not exceeding \$1.32 million, excluding equity in primary residence and applicant business.

### Description of Oversight Methods for Subcontracts

Solicitations and agreements will identify all federal regulations that are required to flow down

## 4. Public Notice

### Title VI Plan Notice

SFO will make this Plan available to all staff members and Airport partners. The Plan will also be readily available on SFO's website. Airport concessionaires, lessees, and tenants will be informed of their obligations under the Title VI Plan via memo from the Airport Director, and through other methods such as tenant meetings.

### FAA Unlawful Discrimination Poster

The Airport has posted the FAA Unlawful Discrimination Poster throughout its public-facing facilities, including information booths, passenger recompose areas, SFO's Rental Car Center, and at its onsite hotel, the Grand Hyatt Hotel at SFO. Indicated below are the specific locations where the poster is currently displayed at SFO:

| Locations                                              | Quantity |
|--------------------------------------------------------|----------|
| <b>Departures (Pre-Security)</b>                       |          |
| Marketplace A Information Booth                        | 1        |
| Marketplace G Information Booth                        | 1        |
| International Terminal Front Lobby Information Booth A | 1        |
| International Terminal Front Lobby Information Booth B | 1        |
| BART Station                                           | 1        |
| Terminal 1 Information Booth                           | 1        |
| Terminal 2 Information Booth                           | 1        |
| <b>Departures (Post-Security)</b>                      |          |
| International Terminal Recompose Area A                | 1        |
| International Terminal Recompose Area G                | 1        |
| Terminal 1 Recompose Area                              | 1        |

|                                            |           |
|--------------------------------------------|-----------|
| Terminal 2 Recompose Area                  | 1         |
| Terminal 3 F1 Recompose Area               | 1         |
| Terminal 3 F3 Recompose Area               | 1         |
| Terminal 3 Information Booth               | 1         |
| <b>Arrivals</b>                            |           |
| International Arrivals Information Booth A | 1         |
| International Arrivals Information Booth G | 1         |
| Terminal 1 Arrivals Information Booth      | 1         |
| Terminal 2 Arrivals Information Booth      | 1         |
| Terminal 3 Arrivals Information Booth      | 1         |
| <b>Other</b>                               |           |
| Airport Rental Car Center                  | 8         |
| Grand Hyatt Hotel at SFO                   | 2         |
| <b>Total</b>                               | <b>29</b> |

### Public Outreach

SFO is committed to regularly communicating and engaging with the surrounding communities. As an agency of the City and County of San Francisco (City), SFO adopts and adheres to the City's official policies and guidelines pertaining to public notice.

Airport Commission meetings serve as a primary method for public engagement concerning Airport activities and procurement. These meetings generally take place on the first and third Tuesday of every month at San Francisco City Hall, and remotely via teleconference. Whether attending in person or remotely, community members have an opportunity to provide public comment on agenda matters in advance of the meeting (via an online form, email, or phone) during the meeting, and to provide public comment on matters not on the agenda at the end of the meeting. The Commission Secretary's Office is responsible for sharing meeting agendas, minutes, and notices of public hearings, which are also available in Spanish, Filipino, and Chinese upon request. Airport Commission Meeting agendas, minutes, and recordings are available to download at <https://www.flysfo.com/about/airport-commission/agendas-minutes-recordings>.

Additionally, SFO's Marketing and Communications team is responsible for identifying effective media platforms to share announcements and notices. The chart below provides a breakdown of SFO's public-facing communication channels:

|                       | <b>Public Communication Channels</b>                                                                                                                                                                                  |                                       |                                                                                                                                                  |                                                                                                                |                                                  |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| <b>Websites/Email</b> | Flysfo.com                                                                                                                                                                                                            |                                       | SFOMuseum.org                                                                                                                                    | SFO Newsletter                                                                                                 |                                                  |
|                       | Provides links to all public notices, privacy and retention information, accessibility efforts, and Commission agendas. Work is underway to provide human-translated web content in Spanish, Filipino, and Cantonese. |                                       | Insights related to the Airport's public art program, including permanent collection of paintings, sculptures, mosaics, and environmental works. | Quarterly newsletter to 120K+ subscribers with updates related to airline launches, improvement projects, etc. |                                                  |
| <b>Social Media</b>   | Twitter                                                                                                                                                                                                               | Facebook                              | Instagram                                                                                                                                        | YouTube                                                                                                        | LinkedIn                                         |
|                       | Primary news, information, and announcements                                                                                                                                                                          | Longer format social interest stories | Short video/image format communications                                                                                                          | Longer format video communications                                                                             | Employment, contract, and career-focused channel |

## 5. Community Statistics

SFO has undertaken efforts to understand the demographics of its surrounding communities, especially as it relates to those communities that may be affected, and/or burdened by the Airport's planning activities, projects, or operations.

The table below lists the Airport's surrounding communities, along with their respective population size. These communities, hereinafter referred to collectively as the Airport's "Affected Communities," are being identified based on their close proximity to the Airport or due to falling geographically within the Airport's flight path.<sup>5</sup>

<sup>5</sup> See Appendix A for the Airport's 2019 Noise Exposure Map, illustrating aircraft noise contours from SFO's property boundaries.

| <b>Affected Communities</b> | <b>Population<sup>6</sup></b> |
|-----------------------------|-------------------------------|
| Burlingame                  | 31,386                        |
| Daly City                   | 104,901                       |
| Foster City                 | 33,805                        |
| Millbrae                    | 23,216                        |
| San Bruno                   | 43,908                        |
| San Mateo                   | 105,661                       |
| South San Francisco         | 66,105                        |

### Affected Community Diversity

San Francisco is the fourth largest city in California and the 17<sup>th</sup> largest city in the United States, with a population that is growing annually. Per 2020 U.S. Census data<sup>7</sup>, the cumulative population of SFO's Affected Communities totals 402,982 persons and is comprised of racial, income, and linguistic diversity.

**Affected Communities:** Burlingame, Daly City, Foster City, Millbrae, San Bruno, San Mateo, South San Francisco

**Total Population of Affected Communities:** 408,982

| <b>Minority Demographic Groups</b>        | <b>Number of People in Minority Group</b> | <b>Percent of Community Population</b> |
|-------------------------------------------|-------------------------------------------|----------------------------------------|
| White                                     | 111,040                                   | 27.2%                                  |
| Black or African American                 | 6,872                                     | 1.7%                                   |
| American Indian or Alaska Native          | 556                                       | 0.1%                                   |
| Asian                                     | 167,150                                   | 40.9%                                  |
| Native Hawaiian or Other Pacific Islander | 4,961                                     | 1.2%                                   |
| Hispanic or Latino                        | 95,672                                    | 23.4%                                  |
| Multiracial                               | 19,171                                    | 4.7%                                   |
| Other                                     | 3,560                                     | 0.9%                                   |

### Racial and Ethnic Makeup of Affected Communities

Demographic data for race/color and national origin help the Airport identify the racial makeup of populations in each Affected Community. Demographic racial composition is retrieved from 2020 U.S. Census data<sup>8</sup> and grouped by each Affected Community as follows:

<sup>6</sup> Source: 2020 U.S Decennial Census P.L. 94-171 Redistricting Data

<sup>7</sup> Source: 2020 U.S Decennial Census P.L. 94-171 Redistricting Data

<sup>8</sup> Source: 2020 U.S Decennial Census P.L. 94-171 Redistricting Data

**Affected Community: Burlingame**  
**Total Affected Community Population: 31,386**

| <b>Demographic Group within Affected Community</b> | <b>Number of People in Minority Group</b> | <b>Percent of Total Affected Community Population</b> |
|----------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| White                                              | 15,826                                    | 50.4%                                                 |
| Black or African American                          | 284                                       | 0.9%                                                  |
| American Indian or Alaska Native                   | 20                                        | 0.1%                                                  |
| Asian                                              | 8,574                                     | 27.3%                                                 |
| Native Hawaiian or Other Pacific Islander          | 105                                       | 0.3%                                                  |
| Hispanic or Latino                                 | 4,263                                     | 13.6%                                                 |
| Multiracial                                        | 1,976                                     | 6.3%                                                  |
| Other                                              | 338                                       | 1.1%                                                  |

**Affected Community: Daly City**  
**Total Affected Community Population: 104,901**

| <b>Demographic Group within Affected Community</b> | <b>Number of People in Minority Group</b> | <b>Percent of Total Affected Community Population</b> |
|----------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| White                                              | 12,207                                    | 11.6%                                                 |
| Black or African American                          | 2,360                                     | 2.2%                                                  |
| American Indian or Alaska Native                   | 112                                       | 0.1%                                                  |
| Asian                                              | 59,722                                    | 56.9%                                                 |
| Native Hawaiian or Other Pacific Islander          | 705                                       | 0.7%                                                  |
| Hispanic or Latino                                 | 25,237                                    | 24.1%                                                 |
| Multiracial                                        | 3,633                                     | 3.5%                                                  |
| Other                                              | 925                                       | 0.9%                                                  |

**Affected Community: Foster City**  
**Total Affected Community Population: 33,805**

| <b>Demographic Group within Affected Community</b> | <b>Number of People in Minority Group</b> | <b>Percent of Total Affected Community Population</b> |
|----------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| White                                              | 10,734                                    | 31.8%                                                 |
| Black or African American                          | 479                                       | 1.4%                                                  |
| American Indian or Alaska Native                   | 31                                        | 0.1%                                                  |
| Asian                                              | 17,992                                    | 53.2%                                                 |
| Native Hawaiian or Other Pacific Islander          | 179                                       | 0.5%                                                  |
| Hispanic or Latino                                 | 2,421                                     | 7.2%                                                  |

|             |       |      |
|-------------|-------|------|
| Multiracial | 1,711 | 5.1% |
| Other       | 258   | 0.8% |

**Affected Community: Millbrae**  
**Total Affected Community Population: 23,216**

| <b>Demographic Group within Affected Community</b> | <b>Number of People in Minority Group</b> | <b>Percent of Total Affected Community Population</b> |
|----------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| White                                              | 6,867                                     | 29.6%                                                 |
| Black or African American                          | 170                                       | 0.7%                                                  |
| American Indian or Alaska Native                   | 16                                        | 0.1%                                                  |
| Asian                                              | 12,155                                    | 52.4%                                                 |
| Native Hawaiian or Other Pacific Islander          | 216                                       | 0.9%                                                  |
| Hispanic or Latino                                 | 2,621                                     | 11.3%                                                 |
| Multiracial                                        | 998                                       | 4.3%                                                  |
| Other                                              | 173                                       | 0.7%                                                  |

**Affected Community: San Bruno**  
**Total Affected Community Population: 43,908**

| <b>Demographic Group within Affected Community</b> | <b>Number of People in Minority Group</b> | <b>Percent of Total Affected Community Population</b> |
|----------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| White                                              | 12,982                                    | 29.6%                                                 |
| Black or African American                          | 699                                       | 1.6%                                                  |
| American Indian or Alaska Native                   | 75                                        | 0.2%                                                  |
| Asian                                              | 13,927                                    | 31.7%                                                 |
| Native Hawaiian or Other Pacific Islander          | 1,126                                     | 2.6%                                                  |
| Hispanic or Latino                                 | 12,282                                    | 28.0%                                                 |
| Multiracial                                        | 2,373                                     | 5.4%                                                  |
| Other                                              | 444                                       | 1.0%                                                  |

**Affected Community: San Mateo**  
**Total Affected Community Population: 105,661**

| <b>Demographic Group within Affected Community</b> | <b>Number of People in Minority Group</b> | <b>Percent of Total Affected Community Population</b> |
|----------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| White                                              | 40,519                                    | 38.3%                                                 |
| Black or African American                          | 1,696                                     | 1.6%                                                  |
| American Indian or Alaska Native                   | 177                                       | 0.2%                                                  |

|                                           |        |       |
|-------------------------------------------|--------|-------|
| Asian                                     | 27,786 | 26.3% |
| Native Hawaiian or Other Pacific Islander | 1,634  | 1.5%  |
| Hispanic or Latino                        | 27,198 | 25.7% |
| Multiracial                               | 5,737  | 5.4%  |
| Other                                     | 914    | 0.9%  |

**Affected Community: South San Francisco**  
**Total Affected Community Population: 66,105**

| <b>Demographic Group within Affected Community</b> | <b>Number of People in Minority Group</b> | <b>Percent of Total Affected Community Population</b> |
|----------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| White                                              | 11,905                                    | 18.0%                                                 |
| Black or African American                          | 1,184                                     | 1.8%                                                  |
| American Indian or Alaska Native                   | 125                                       | 0.2%                                                  |
| Asian                                              | 26,994                                    | 40.8%                                                 |
| Native Hawaiian or Other Pacific Islander          | 996                                       | 1.5%                                                  |
| Hispanic or Latino                                 | 21,650                                    | 32.8%                                                 |
| Multiracial                                        | 2,743                                     | 4.1%                                                  |
| Other                                              | 508                                       | 0.8%                                                  |

**Income Demographics in Affected Communities**

Per DOT Order 5610.2, *Environmental Justice in Minority and Low-Income Populations*, a low-income area is defined as “an identifiable group of persons living in geographic proximity, whose median household income is at or below the Federal 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 has information about affected and potentially affected low-income communities on file. According to 2021 American Community Survey data<sup>9</sup>, the overall level for SFO’s Affected Communities remains “low” compared with the rest of California, averaging 5.9% relative to the state average of 12.3%.

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<sup>9</sup> Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, B05012 Table: Nativity in the United States

The poverty rates of SFO's Affected Communities are as follows:<sup>10</sup>

| <b>Affected Communities</b> | <b>Poverty Rate</b> |
|-----------------------------|---------------------|
| Burlingame                  | 4.2%                |
| Daly City                   | 7.8%                |
| Foster City                 | 3.5%                |
| Millbrae                    | 6.6%                |
| San Bruno                   | 5.4%                |
| San Mateo                   | 6.7%                |
| South San Francisco         | 6.3%                |

#### Foreign-Born Populations in Affected Communities

According to the U.S. Census Bureau, 34% of persons in the San Francisco area are foreign-born, including immigrants, refugees, temporary residents such as students and temporary workers, and anyone else who is not a U.S. citizen at birth. The table below outlines the foreign-born rate for each of SFO's Affected Communities:<sup>11</sup>

| <b>Affected Communities</b> | <b>Foreign-Born Rate</b> |
|-----------------------------|--------------------------|
| Burlingame                  | 30.2%                    |
| Daly City                   | 50.7%                    |
| Foster City                 | 48.2%                    |
| Millbrae                    | 38.9%                    |
| San Bruno                   | 39.7%                    |
| San Mateo                   | 35.0%                    |
| South San Francisco         | 39.5%                    |

<sup>10</sup> Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, DP02 Table: Selected Social Characteristics in the United States

<sup>11</sup> Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, DP02 Table: Selected Social Characteristics in the United States

### Limited English Proficiency (LEP)

According to the U.S. Census Bureau, nearly 43% of San Franciscans speak a language other than English at home. Across the Airport's Affected Communities, an average of 17.3% of residents speak English "less than very well."<sup>12</sup> The following table identifies the number of people in a particular language group (not English) within the Airport's Affected Communities:<sup>13</sup>

#### **Affected Community: Burlingame**

**Total Affected Community Population (5 years of age and older): 29,261**

| <b>Language Group within Affected Community</b> | <b>Number of People in Language Group</b> | <b>Percent of Total Affected Community Population</b> |
|-------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| Spanish                                         | 1,273                                     | 4.4%                                                  |
| Other Indo-European Languages                   | 554                                       | 1.9%                                                  |
| Asian and Pacific Islander Languages            | 1,837                                     | 6.3%                                                  |
| Other Languages                                 | 176                                       | 0.6%                                                  |

#### **Affected Community: Daly City**

**Total Affected Community Population (5 years of age and older): 100,378**

| <b>Language Group within Affected Community</b> | <b>Number of People in Language Group</b> | <b>Percent of Total Affected Community Population</b> |
|-------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| Spanish                                         | 6,750                                     | 6.7%                                                  |
| Other Indo-European Languages                   | 1,268                                     | 1.3%                                                  |
| Asian and Pacific Islander Languages            | 19,394                                    | 19.3%                                                 |
| Other Languages                                 | 383                                       | 0.4%                                                  |

#### **Affected Community: Foster City**

**Total Affected Community Population (5 years of age and older): 31,628**

| <b>Language Group within Affected Community</b> | <b>Number of People in Language Group</b> | <b>Percent of Total Affected Community Population</b> |
|-------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
|                                                 |                                           |                                                       |

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<sup>12</sup> The Census Bureau asks three questions to gather data on those speaking a language other than English at home, what that language is, and how well each person speaks English. To determine English proficiency, Census respondents are asked how well they speak English on a scale of "very well" to "well," "not well," and "not at all." Understanding the response rate of less than very well is an indicator for identifying households with Limited English Proficiency (LEP) or significant LEP populations.

<sup>13</sup> Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, DP02 Table: Selected Social Characteristics in the United States

|                                      |       |       |
|--------------------------------------|-------|-------|
| Spanish                              | 375   | 1.2%  |
| Other Indo-European Languages        | 842   | 2.7%  |
| Asian and Pacific Islander Languages | 3,639 | 11.5% |
| Other Languages                      | 284   | 0.9%  |

**Affected Community: Millbrae**

**Total Affected Community Population (5 years of age and older): 21,781**

| <b>Language Group within Affected Community</b> | <b>Number of People in Language Group</b> | <b>Percent of Total Affected Community Population</b> |
|-------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| Spanish                                         | 363                                       | 1.7%                                                  |
| Other Indo-European Languages                   | 532                                       | 2.4%                                                  |
| Asian and Pacific Islander Languages            | 3,063                                     | 14.1%                                                 |
| Other Languages                                 | 47                                        | 0.2%                                                  |

**Affected Community: San Bruno**

**Total Affected Community Population (5 years of age and older): 41,668**

| <b>Language Group within Affected Community</b> | <b>Number of People in Language Group</b> | <b>Percent of Total Affected Community Population</b> |
|-------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| Spanish                                         | 3,480                                     | 8.4%                                                  |
| Other Indo-European Languages                   | 1,224                                     | 2.9%                                                  |
| Asian and Pacific Islander Languages            | 3,279                                     | 7.9%                                                  |
| Other Languages                                 | 73                                        | 0.2%                                                  |

**Affected Community: San Mateo**

**Total Affected Community Population (5 years of age and older): 98,086**

| <b>Language Group within Affected Community</b> | <b>Number of People in Language Group</b> | <b>Percent of Total Affected Community Population</b> |
|-------------------------------------------------|-------------------------------------------|-------------------------------------------------------|
| Spanish                                         | 8,267                                     | 8.4%                                                  |
| Other Indo-European Languages                   | 2,138                                     | 2.2%                                                  |
| Asian and Pacific Islander Languages            | 6,115                                     | 6.2%                                                  |
| Other Languages                                 | 291                                       | 0.3%                                                  |

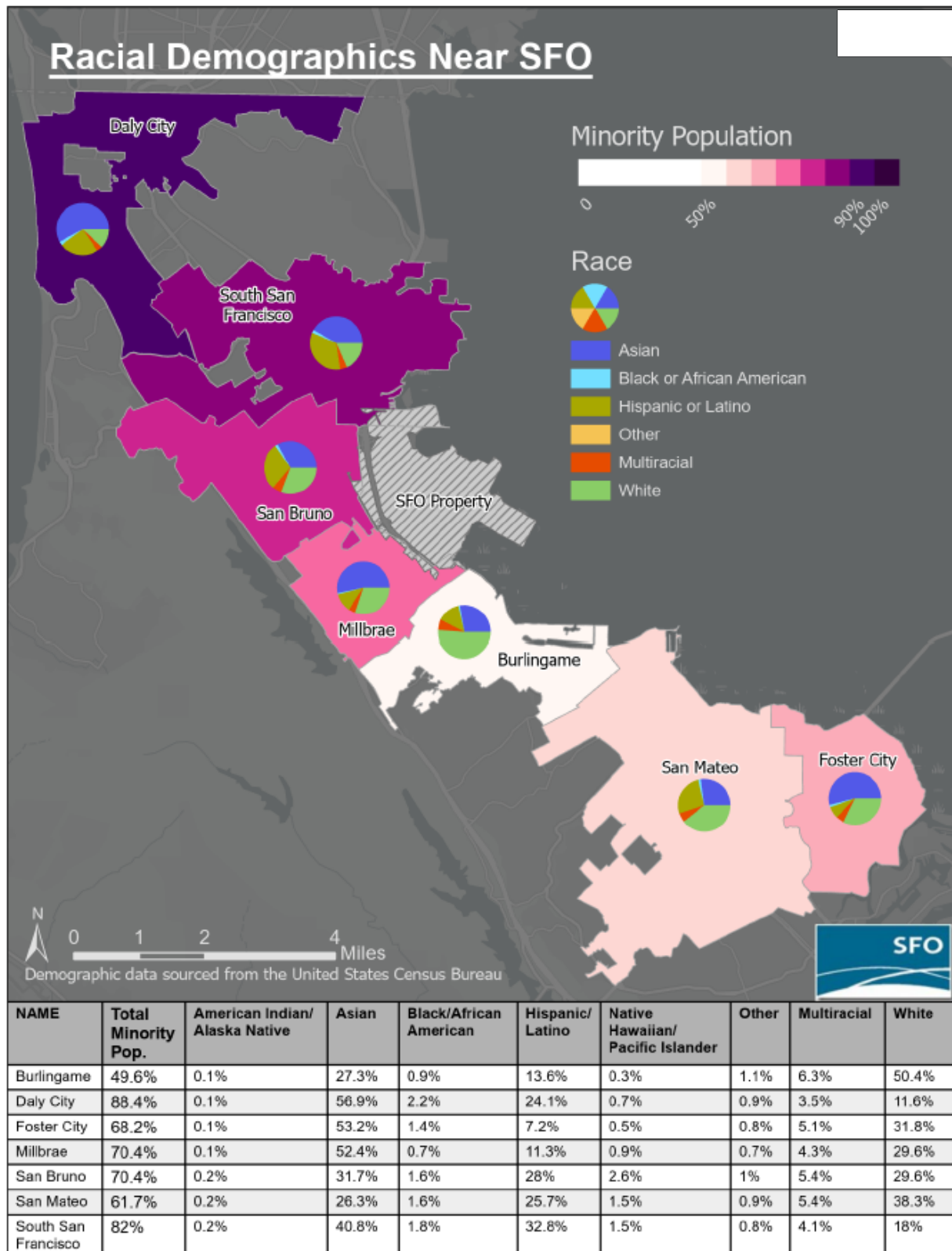
**Affected Community: South San Francisco**  
**Total Affected Community Population (5 years of age and older): 63,262**

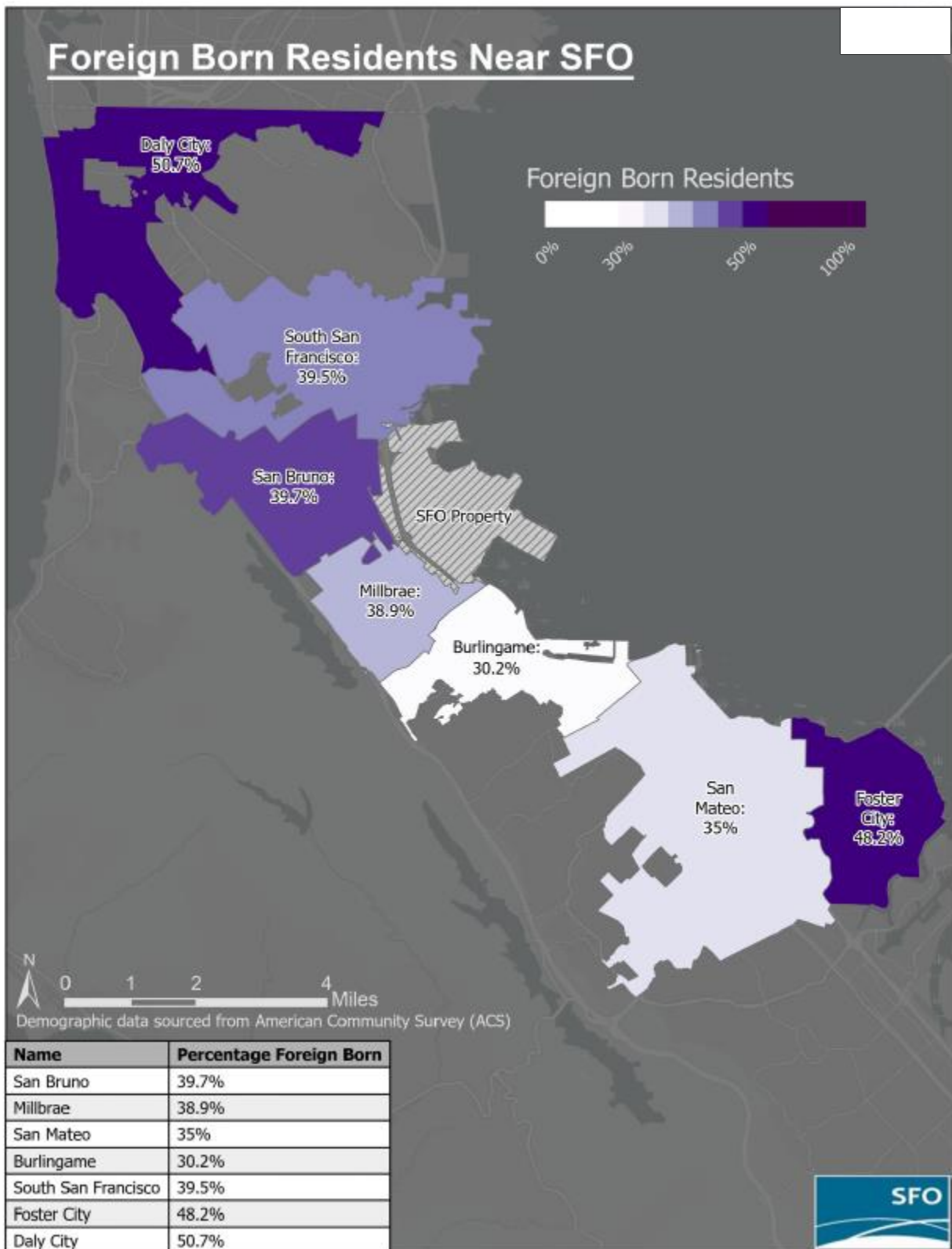
|                                      |       |       |
|--------------------------------------|-------|-------|
|                                      |       |       |
| Spanish                              | 4,488 | 7.1%  |
|                                      |       |       |
| Asian and Pacific Islander Languages | 6,713 | 10.6% |
|                                      |       |       |

## 6. Population / Language Data

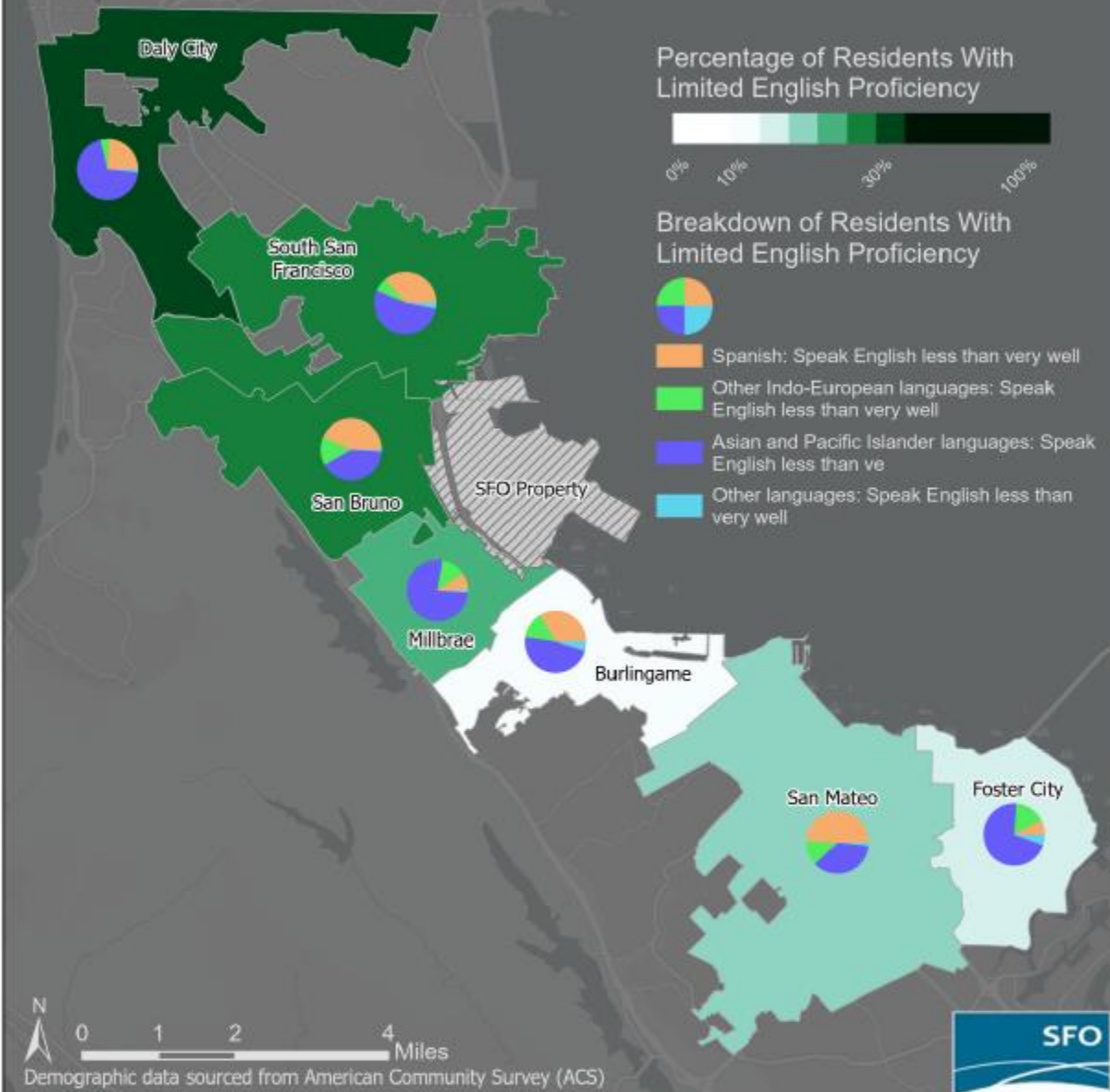
Pursuant to Title 49 CFR Section 21.9(b)(3), in determining the site or location of federally funded facilities, selections may not be made with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination on the grounds of race, color, or national origin. Further, Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”

The maps below draw on 2020 U.S Decennial Census data and 2017-2021 American Community Survey 5-Year Estimates to illustrate the racial (**Chart 1**), foreign-born (**Chart 2**), and Limited English Proficiency (LEP) (**Chart 3**) demographics for the Airport’s Affected Communities.





## Residents With Limited English Proficiency Near SFO



| Name                | Total | Spanish | Other Indo-European Languages | Asian and Pacific Islander Languages | Other Languages |
|---------------------|-------|---------|-------------------------------|--------------------------------------|-----------------|
| Burlingame          | 13.1% | 4.4%    | 1.9%                          | 6.3%                                 | 0.6%            |
| Daly City           | 27.7% | 6.7%    | 1.3%                          | 19.3%                                | 0.4%            |
| Foster City         | 16.3% | 1.2%    | 2.7%                          | 11.5%                                | 0.9%            |
| Millbrae            | 18.4% | 1.7%    | 2.4%                          | 14.1%                                | 0.2%            |
| San Bruno           | 19.3% | 8.4%    | 2.9%                          | 7.9%                                 | 0.2%            |
| San Mateo           | 17.1% | 8.4%    | 2.2%                          | 6.2%                                 | 0.3%            |
| South San Francisco | 19.7% | 7.1%    | 1.5%                          | 10.6%                                | 0.6%            |

## 7. Potential or Known Community Impacts

In general, SFO activities must not 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. The Airport understands that any policies or procedures that have a disparate impact require a well-documented substantial legitimate nondiscriminatory justification. Impact to protected communities must be avoided or minimized to the extent possible.

SFO is compliant with environmental review requirements at both the state (California Environmental Quality Act (CEQA)) and federal (National Environmental Policy Act (NEPA)) level, which are respectively regulated by the California Governor's Office of Planning and Research and the FAA. Moreover, the Airport routinely coordinates with the following agencies so planned undertakings are implemented in the least impactful way to the human environment, including but not limited to: the United States Army Corps of Engineers (USACE), the United States Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), San Francisco Bay Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and the San Francisco Bay Conservation and Development Commission (BCDC).

### Existing Airport Facilities

The following airport facilities are already in use, expected to be in use within the next three years, under construction, or expected to be under construction within/after three years. As of the effective date of this Plan, there are no Affected Communities that will be disparately impacted on the basis of race, color, national origin (including limited English proficiency (LEP)), sex (including sexual orientation and gender identity), creed, or age by the construction and operation of existing facilities. The Airport will continue to assess any direct or indirect discriminatory effects resulting from proposed projects within existing airport facilities, regardless of funding source.

| Existing Airport Facility Projects                                                                            | Affected Community Impacted |
|---------------------------------------------------------------------------------------------------------------|-----------------------------|
| Taxiways A & B Rehabilitation, Phase 1                                                                        | None                        |
| Boarding Area G Remote Overnight 400 Hz Ground Power Units Replacement                                        | None                        |
| BA TR/TS 12 KV Cable Replacement, Phase 1 (12kV Power Distribution Cable Replacement to Substation TR and TS) | None                        |
| Runway 10L-28R 5KV Cable Replacement                                                                          | None                        |
| International Terminal Building Roof, Exterior Envelope, and PV Upgrades                                      | None                        |
| HVAC Improvements at International Terminal Building Central                                                  | None                        |
| Runway 1R-19L Rehabilitation                                                                                  | None                        |

|                                                                                                                |                                   |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------|
| edges Chargers, Phase 1 (Boarding Area A)                                                                      | None                              |
| Recycled Water Systems                                                                                         | None                              |
| Generator Bldg. Replacement for Field Lighting Bldg. No. 1                                                     | None                              |
| Station BB 12kV Infrastructure Reconfiguration (Redistribute 12KV Infrastructure between Lots D and DD Part 1) | None                              |
| Terminal 2 Interior Improvements                                                                               | None                              |
| Plot 10F RON Aircraft Parking and Remote Loading                                                               | None                              |
| Boarding Area G Gate Enhancements                                                                              | None                              |
| International Terminal Building Passenger Improvements                                                         | None                              |
| Taxiways E and J Reconstruction                                                                                | None                              |
| Airport EV Chargers, Phase 1                                                                                   | None                              |
| Terminal 1 Sanitary Sewer Lift Station 1 and 2 and Force Main                                                  | None                              |
| MLTP Sanitary Process Conversion-Nutrient Removal                                                              | None                              |
| RAC Electrical Load Center Upgrade (Redistribute 12kv in RAC by Level Part 2)                                  | None                              |
| Taxiways A & B Rehabilitation, Phase 2                                                                         | None                              |
| Airfield Lighting 5KV Cable Replacement, Phase 2 (Runway Circuits for Field Lighting Bldg. No 2)               | None                              |
| geese Chargers, Phase 2 (Boarding Area C)                                                                      | None                              |
| Industrial Waste Pump Station D and Force Main Replacement                                                     | None                              |
| Fiber Upgrade Program, Phase 1                                                                                 | None                              |
| BA TR/TS 12KV Cable Replacement, Phase 2 (Electrical Power Distribution Replacement)                           | None                              |
| Energy Management Control System                                                                               | None                              |
| ITB Phase 2                                                                                                    | None                              |
| Terminal 1 Center                                                                                              | None                              |
| Terminal 3 West Modernization                                                                                  | None                              |
| Courtyard 3 Connector                                                                                          | None                              |
| Taxiways D and T Reconstruction                                                                                | None                              |
| Taxiway Z Rehabilitation                                                                                       | None                              |
| Runway 10L-28R Rehabilitation                                                                                  | None                              |
| Effluent Pipeline Replacement to SSF Plant                                                                     | South San Francisco <sup>14</sup> |
| Sanitary Waste Treatment Plant Improvements                                                                    | None                              |

<sup>14</sup> This project will not 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.

|                                          |      |
|------------------------------------------|------|
| Terminal Upper-Level Viaduct Resurfacing | None |
| West of Bayshore Drainage Improvements   | None |
| ASIP Phase 2 - CCTV Assessment           | None |

### Airport Facility Construction Projects

SFO has analyzed planned facility construction projects for disparate impacts on the basis of race, color, national origin (including limited English proficiency (LEP)), sex (including sexual orientation and gender identity), creed, or age in the Affected Communities and determined no projects will result in disparate impact. The following chart lists all airport facility projects that are expected to be in construction within the next three years<sup>15</sup>:

| <b>Airport Facility Construction Projects</b> | <b>Affected Community Impacted</b> |
|-----------------------------------------------|------------------------------------|
| West Field Garage 675                         | None                               |
| Cargo Bldg. 626.1                             | None                               |
| West Field Utilities and Paving               | None                               |
| Cargo Bldg. 720.1 and GSE Bldg. 742           | None                               |

### Noise Mitigation Efforts – SFO Noise Insulation Program

SFO's Noise Compatibility Program (NCP) was approved by the FAA on September 7, 1983, making it the first FAA-approved airport noise compatibility program in the nation. Shortly after the approval of SFO's NCP, the Airport developed and implemented the first phase of its Residential Sound Insulation Program, now known as the Noise Insulation Program (NIP).

Since its implementation, SFO's NIP has made significant progress minimizing noise impact on the Affected Communities. The chart below summarizes efforts undertaken to acquire over 12,000 aviation easements and insulate more than 14,000 properties:

| <b>Summary</b>      | <b>Daly City</b> | <b>Millbrae</b> | <b>San Bruno</b> | <b>South San Francisco</b> | <b>Total</b> |
|---------------------|------------------|-----------------|------------------|----------------------------|--------------|
| Easements           | 2,462            | 1,242           | 2,272            | 6,094                      | 12,070       |
| Dwellings Completed | 2,657            | 1,599           | 2,627            | 7,778                      | 14,661       |

Since the early 2000s, no additional noise-sensitive properties have been impacted; in fact, the Airport's noise contours have shrunk within the Affected Communities, reducing the number of properties affected by aircraft noise. SFO's NIP aims to provide the same service to all

<sup>15</sup> See Appendix B for a detailed breakdown of all capital improvement projects (existing facilities and new construction opportunities) to be undertaken at SFO from 2023-2026, including those not federally funded.

qualifying members of the surrounding communities. Community outreach efforts include offering informational material about the program in five languages and translation services to those who may not be fluent in English. SFO will continue to monitor noise impact areas for potential shifts, as well as identify additional properties requiring noise insulation and/or easement acquisition.

## 8. Staff and Advisory Body Diversity

### Staff Diversity

SFO recognizes the importance of a workforce that reflects the diversity of the communities it serves. SFO collects demographic information for Airport Commission staff when starting their employment with the Airport as a City employee. The following table summarizes the Airport Commission’s workforce by race/ethnicity as of June 1, 2023:

| Race/Ethnicity                    | Percentage of SFO Commission Workforce |
|-----------------------------------|----------------------------------------|
| Black                             | 6.5%                                   |
| Hispanic                          | 13.8%                                  |
| Asian                             | 55.1%                                  |
| American Indian or Alaskan Native | 0.5%                                   |
| Multiracial                       | 1.4%                                   |
| White                             | 22.7%                                  |

Additionally, prospective employees of the City are asked to submit voluntary disclosures regarding their race/ethnicity, gender, and sexual orientation when responding to an Airport job posting. All prospective employees are reminded of the following as part of the application process:

*The City and County of San Francisco encourages women, minorities and persons with disabilities to apply. Applicants will be considered regardless of their sex, race, age, religion, color, national origin, ancestry, physical disability, mental disability, medical condition (associated with cancer, a history of cancer, or genetic characteristics), HIV/AIDS status, genetic information, marital status, sexual orientation, gender, gender identity, gender expression, military and veteran status, or other protected category under the law.*

### Advisory Body Diversity

In 2008, through San Francisco Charter Section 4.101, the City established a policy governing the composition of City and County of San Francisco Boards and Commissions. Among other

directives, the Charter requires that the composition of each appointive board, commission, or advisory body “be broadly representative of the communities of interest, neighborhoods, and the diversity of the City and County in ethnicity, race, age, sex, gender identity, sexual orientation, and types of disabilities.” Additionally, the San Francisco Department on the Status of Women (DOSW) is directed to conduct and publish a gender analysis of the City’s Commissions and Boards every two years. The DOSW’s 2021 report highlighted the following reported information for the San Francisco Airport Commission:

| <b>Policy Body</b> | <b>FY20-21 Budget</b> | <b>Total Seats</b> | <b>Filled Seats</b> | <b>Women</b> | <b>Women of Color</b> | <b>People of Color</b> |
|--------------------|-----------------------|--------------------|---------------------|--------------|-----------------------|------------------------|
| Airport Commission | \$1.37B               | 5                  | 5                   | 40%          | 0%                    | 40%                    |

The Airport Commission consists of five members appointed by the Mayor to four-year terms. The table below describes self-reported race/ethnicity information for the Commission members:

| <b>Commissioner Name</b>               | <b>Self-Reported Race/Ethnicity</b> |
|----------------------------------------|-------------------------------------|
| Malcolm Yeung, President               | Asian                               |
| Everett A. Hewlett, Jr, Vice President | African American                    |
| Jane Natoli, Member                    | White                               |
| Jose Fuentes Almanza, Member           | Hispanic                            |
| Mark Buell, Member                     | White                               |

## 9. Business and Beneficiary Diversity

### Beneficiary Outreach Methods

The Airport directs outreach programs targeting diverse communities to ensure equitable access to SFO’s business opportunities, including certified Small Businesses, San Francisco Local Business Enterprises, Disadvantaged Business Enterprises, and Airport Concession Disadvantaged Business Enterprises based on the relevant scope of work, work codes, or the North American Industry Classification System (NAICS) codes. Bids for concessions and other business opportunities are solicited via the Airport’s distribution list for local and small businesses, which are available in SFO’s Small Business Compliance Management System (B2GNow, <https://flysfo.gob2g.com/>).

Record-keeping for the DBE and ACDBE programs, including documentation for specific DOT-assisted contracts, is managed by the Airport’s Office of Social Responsibility.

The Airport also conducts in-person outreach at community events such as the Small Business Construction Expo, African American Chamber of Commerce, Port of SF, etc. Events are posted on the following website: <https://www.flysfo.com/business/small-business-development>.

#### **Other Beneficiary Demographic Information Collection Methods**

- The Airport's Customer Care Office collects demographic information for guests via

### **10. Limited English Proficiency Programming**

The San Francisco Language Access Ordinance (LAO), formerly known as the Equal Access to Services Ordinance, was enacted in 2001 to provide equal access to City services to all San Franciscans, including those with limited English proficiency. The LAO requires City departments to provide language access services in the following three languages: Chinese (Cantonese and Mandarin), Spanish, and Filipino. These "threshold" languages are designated once the City reaches 10,000 Limited English Proficient (LEP)<sup>16</sup> residents who speak a shared language.

SFO is required to submit language access data on an annual basis to the City's Office of Civic Engagement and Immigrant Affairs (OCEIA). The information below represents a breakdown of the number of Airport guests (LEP Clients) served in a language other than English during FY 2021-2022:

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<sup>16</sup> The term "LEP" refers to individuals who do not speak English as their primary language. These individuals and populations may have a limited ability to read, write, or understand English.

| <b>Language</b>    | <b>LEP Clients (#)</b> |
|--------------------|------------------------|
| Cantonese          | 281                    |
| Mandarin           | 1,234                  |
| Tagalog (Filipino) | 1,382                  |
| Russian            | 1                      |
| Spanish            | 894                    |
| Vietnamese         | 102                    |
| Japanese           | 1                      |
| French             | 17                     |
| German             | 89                     |
| Hindi              | 1,693                  |
| Italian            | 9                      |

### Interpretation Services

The Airport utilizes a Citywide contract with Language Line Services, certified bilingual/multilingual employees, volunteers, and contract vendors to provide language services to LEP clients. SFO Customer Care Ambassadors at the Arrivals Level Information Desks and Departures Level Information Desks wear “language pins” to indicate fluency in particular languages.

SFO currently provides on-demand telephone interpretation services via Language Line Services to Airport guests in the following languages:

- Chinese (Cantonese and Mandarin)
- Filipino (Tagalog)
- Russian
- Spanish
- Vietnamese
- Other (including Amharic, Arabic, Armenian, Creole, French, German, Haitian Creole, Hebrew, Hindi, Italian, Japanese, Korean, Polish Portuguese, Tigrinya, and Urdu)

A letter-sized poster is displayed at every Airport Information Desk informing the public that interpretation services are available at no cost, and lists all the languages noted above. All 13 Information Desks at the Airport have dual telephone handsets for Language Line’s interpretation services. Language Line is also utilized by SFO’s Communication Center and Police Department (San Francisco Police Department - Airport Bureau).

When a request for an interpreter is received, Customer Care Ambassadors at the Information Desks contact Language Line Services, select the requested language, and are connected to a Language Line interpreter where a three-way conversation takes place with the Customer Care Ambassador providing information to the interpreter, and the interpreter relaying the information to the guest in the chosen language for the duration of the call.

The following chart describes the volume of telephone-based interpretation services provided to LEP guests at the Airport via Language Line Services during FY 2021-2022:

|                              | <b>LEP Guests</b> |          |                    |         |         |            |                     |
|------------------------------|-------------------|----------|--------------------|---------|---------|------------|---------------------|
|                              | Cantonese         | Mandarin | Filipino (Tagalog) | Russian | Spanish | Vietnamese | Other <sup>17</sup> |
| <b>Call Volume (numbers)</b> | 13                | 17       | 1                  | 3       | 531     | 9          | 68                  |
| <b>Total LEP Guests</b>      | <b>642</b>        |          |                    |         |         |            |                     |

The Airport also has the following language access services available to ensure LEP individuals have equal access to communication and outreach opportunities:

- SFO's public website is available in multiple languages (French, German, Italian, Japanese, Korean, Chinese, Filipino, Portuguese, and Spanish); and
- SFO continues to utilize multilingual signage in Chinese, Japanese, Korean, and Spanish in its Federal Immigration and Customs area.

The following chart indicates the recorded number of translated written materials (e.g., applications, forms, notices of rights, program materials, etc.) translated at the Airport during FY 2022:

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<sup>17</sup> "Other" languages includes Arabic, Burmese, French, German, Hindi, Hungarian, Italian, Japanese, Korean, Portuguese, Punjabi, Thai, Turkish, and Ukrainian.

|                                       | Translated Language |                    |         |         |            |                     |                 |
|---------------------------------------|---------------------|--------------------|---------|---------|------------|---------------------|-----------------|
|                                       | Chinese             | Filipino (Tagalog) | Russian | Spanish | Vietnamese | Other <sup>18</sup> | Total Materials |
| <b>Number of Translated Materials</b> | 13                  | 7                  | 1       | 13      | 1          | 13                  | <b>48</b>       |

### Multilingual Employees

SFO has a number of multilingual City employees, some of whom have been certified by the City's Department of Human Resources. Others are self-designated as competent in a language other than English. The chart below identifies the total number of multilingual Airport staff identified by languages spoken during FY 2021-2022:

|                                              | Languages Spoken |          |                    |         |         |            |       |
|----------------------------------------------|------------------|----------|--------------------|---------|---------|------------|-------|
|                                              | Cantonese        | Mandarin | Filipino (Tagalog) | Russian | Spanish | Vietnamese | Other |
| <b>Certified Multilingual Employee</b>       | 4                | 3        | 2                  | 0       | 7       | 0          | 2     |
| <b>Multilingual Employee (non-certified)</b> | 32               | 37       | 35                 | 2       | 28      | 6          | 70    |
| <b>Total No. of Multilingual Employees</b>   | <b>184</b>       |          |                    |         |         |            |       |

## 11. Transportation

### Public Transportation at SFO

SFO is serviced by multiple public transportation carriers. The chart below identifies transit

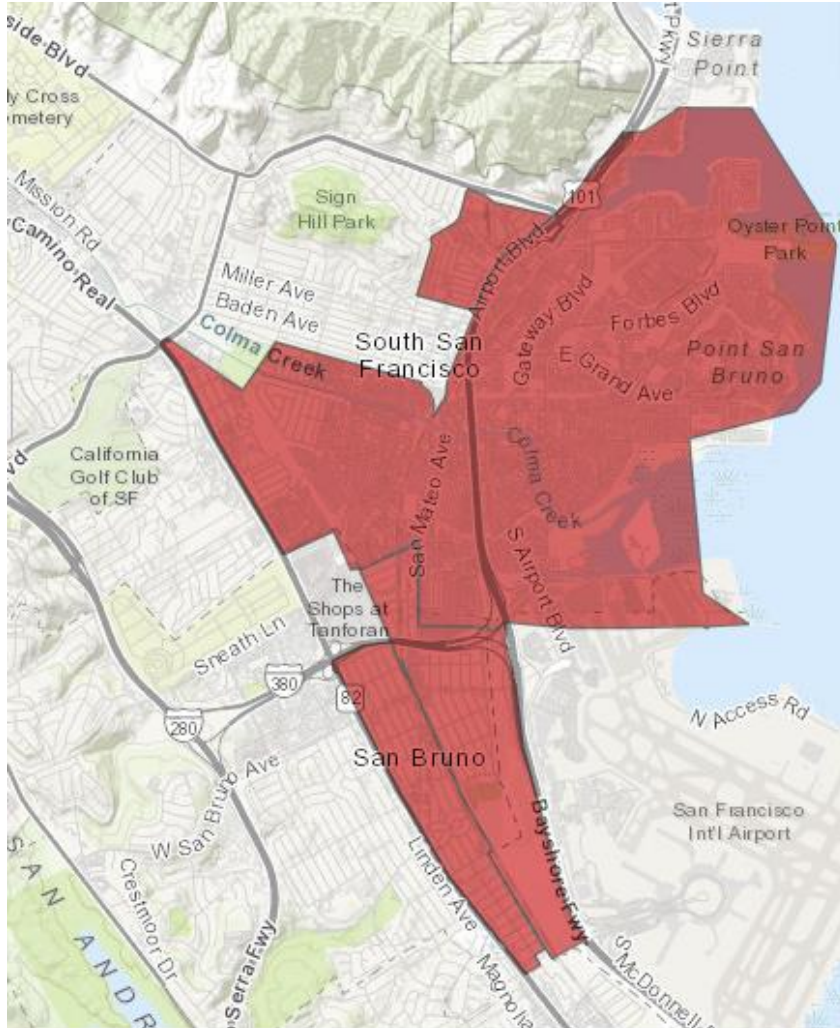
<sup>18</sup> "Other" languages include French, German, Italian, Japanese, Korean, and Portuguese.

services enabling public access to the Airport:

| <b>Transit Service</b>                                             | <b>Communities Served</b>                                                                                                                                                                                                                                                             |
|--------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bay Area Rapid Transit (BART)                                      | BART operates rapid rail service directly from SFO to northern San Mateo County, San Francisco, and the East Bay. BART is accessible from any terminal via SFO's AirTrain.                                                                                                            |
| San Mateo County Transit District (SamTrans)<br>Public Bus Service | SamTrans provides 24-hour service connecting SFO to San Mateo County and parts of San Francisco and Palo Alto. SamTrans bus stops are located at Terminals 2 and 3, as well as the International Terminal at SFO. Additional stops are located on the campus away from the terminals. |
| Caltrain Commuter Rail                                             | Caltrain provides rail service between San Francisco and San Jose, connecting to SFO via BART.                                                                                                                                                                                        |
| Airporters                                                         | SFO is serviced by three Airporters (privately owned buses that travel to pre-arranged stops) to/from the counties of Marin, Sonoma, Monterey, and Santa Clara.                                                                                                                       |

## Public Transportation to Disadvantaged Communities

Section 5 (Community Statistics) provides details regarding the racial, income, and linguistic diversity of the Airport's Affected Communities. The information below highlights Daly City, South San Francisco, San Bruno, and Millbrae as being comprised of predominantly minority populations at 88%, 82%, 70%, and 70%, respectively. The disadvantaged community areas<sup>19</sup> located within the Affected Communities are identified in the map below:



<sup>19</sup> CalEnviroScreen, an analytical tool created by the California Environmental Protection Agency (CalEPA), combines different types of census tract-specific information into a score to determine which communities are the most burdened or "disadvantaged." **Disadvantaged communities** refer to the areas throughout California which suffer most from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, presence of hazardous wastes, as well as high incidence of asthma and heart disease.

The identified disadvantaged community areas are situated within San Bruno and South San Francisco, both of which are serviced by SamTrans as the transit provider. The following chart identifies existing SamTrans services connecting these community areas directly to SFO, and by extension, the Airport's business/employment center:

| Disadvantaged Community Areas | Transit Service                       | Planned or Existing |
|-------------------------------|---------------------------------------|---------------------|
| South San Francisco           | Fixed-route buses (route 292 and 397) | Existing            |

## 12. Title VI Coordinator Responsibilities and Training

### Title VI Coordinator Responsibilities

SFO's Title VI Coordinator is assigned to the Airport's Office of Diversity, Equity and Inclusion. Among other responsibilities, the Airport's Title VI Coordinator is responsible for the following:

- Proactively ensuring SFO is in compliance with all non-discrimination requirements under Title VI and for reporting to SFO leadership on the status of Title VI compliance issues.
- Responding 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.
- Receiving discrimination complaints covered by Title VI and related requirements, and forwarding them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.
- Providing the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
- Annually reviewing SFO's Title VI Plan and disseminating applicable information to staff.
- Coordinating data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by Airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) and (c)). Data collection methods will include optional demographic questions in: SFO customer satisfaction surveys, customer complaints, and bids/proposals for airport contracts, and other methods described in SFO's Community Participation Plan (CPP).

- Maintaining demographic data for members of appointed planning and advisory bodies at SFO, and identifying any disparities compared to the affected community demographics. Additionally, providing information to the membership selecting official/committee, particularly when vacancies occur.
- Maintaining a copy of 49 CFR Part 21 for inspection by any person requesting to view the information during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

## Training

The Airport's Office of Diversity, Equity, and Inclusion is responsible for ensuring staff supporting the Title VI Program are adequately trained to meet legislative and regulatory requirements.

Essential training topics include:

- Title VI complaint process, including access to and familiarity with the Airport's ZenDesk and the FAA Civil Rights Connect System (<https://faa.civilrightsconnect.com/>)
- Airport language assistance resources and practices
- Collecting and assessing demographic data
- Title VI and related laws prohibiting discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age
- Role of the Title VI Coordinator and stakeholder's responsibility to forward all Title VI complaints to the Title VI Coordinator
- Protections against retaliation for filing civil rights complaints or related actions
- Title VI notification requirements - all notices must be displayed throughout SFO's public facilities
- Contract assurance language - all contracts must include Title VI clauses
- Language interpretation and translation services
- Cultural and community relations sensitivity training
- Anti-harassment training

Refresher train-the-trainer training will be provided on a biennial basis.

## 13. Compliance Reviews, Audits, Complaints, Lawsuits, and Other Investigations

FAA Notification The Title VI Coordinator is responsible for notifying the FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements<sup>20</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>21</sup>

As discussed in Section 14 below, the Airport is required to forward all Title VI complaints to the FAA within 15 days of receipt. For all other civil rights investigations, SFO will notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, the Title VI Coordinator is responsible for providing FAA contacts with status updates for the investigations and reviews, until the investigation has been completed. For each existing investigation or review completed within five years of the Plan, the Coordinator will also provide a statement regarding the outcome, unless previously provided.

## 14. Title VI Complaints

Scope The following procedures apply to complaints of discrimination under Title VI and related laws (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 of administrative requirements under Title VI, or related laws.
2. Not only be for employment matters<sup>22</sup>

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<sup>20</sup> Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance reviews or audits to be performed on the Airport sponsor or any of its sub-recipients by any state, local or federal agency.

<sup>21</sup> Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the Airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

<sup>22</sup> 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.

3. Allege misconduct by SFO, including Airport employees, contractors, concessionaires, lessees, or tenants.
4. Relate to a concern about an airport facility or actions by SFO, including Airport employees, contractors, concessionaires, lessees, or tenants.

**Rights** Any person who believes 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. Alternatively, individuals may also file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the FAA, or seek other legal remedies.

**Receipt of Complaint** Once a complaint has been received, the Title VI Coordinator will log in the complaint and promptly send copies of the complaint to the appropriate Airport work sections (e.g., Guest Services, Revenue Development and Management, etc.) and leadership teams.

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

**San Francisco International Airport**  
**Attn: Title VI Complaints / Office of Diversity, Equity & Inclusion**  
**P.O. Box 8097**  
**San Francisco, CA 94128**  
**(650) 821-3596**  
[SFO-TitleVICoordinator@flysf.com](mailto:SFO-TitleVICoordinator@flysf.com)

If a complaint is initially made by phone, it must be supplemented with a written complaint within 180 days of the alleged discriminatory event. If a verbal complaint is received, the complainant should be given a copy of the Airport's Title VI Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

**Initial Procedure** The Title VI Coordinator may meet with the complainant to clarify the issues, obtain additional information, and determine if informal resolution might be possible in lieu of an investigation. If successfully resolved, the Title VI Coordinator will issue a closure letter to the complainant, record the disposition in the complaint 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 Title VI Coordinator within five days of becoming aware of the complaint.

*Initial FAA Notification* A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt by the Title VI Coordinator. 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 Civil Rights staff. (Note: complaints based on disability are not required to be forwarded to the FAA.) To transmit complaint information to the FAA, the Title VI Coordinator is responsible for uploading the requested background information to the FAA's Civil Rights Connect System.

## **Investigation Procedure**

*Assignment of Investigator* The Title VI Coordinator will immediately begin the investigation or designate an investigator.

*Cooperation with the FAA* The Title VI Coordinator, or designee, will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against SFO, the Title VI Coordinator will avoid interfering with the FAA's investigation, cooperate with the FAA when needed, and share factual information with the FAA.

*Prompt Investigation* The Title VI Coordinator, or designee, will make every effort to complete discrimination complaint investigations within 90 calendar days after the complaint is received. Some investigations may take longer with a justification for the delay and assurance that the investigation is being completed as quickly as possible.

*Contact with Complainant* The Title VI Coordinator, or designee, will communicate with the complainant to clarify the issues and obtain additional information, and also speak with potential witnesses, as appropriate.

*Investigation Report* After completing the investigation, the Title VI Coordinator, or designee, will prepare a written report.

*Forwarding Report and Response to Complainant* Upon 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 SFO's conclusion regarding whether unlawful discrimination

occurred, and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

*Appeal Rights* The complainant will be notified of their right to appeal the finding or determination, and of the procedures and requirements for an appeal:

- The complainant may appeal in writing to the Airport's Office of Diversity, Equity, and Inclusion.
- The written appeal must be received within 15 business days after receipt of the written decision.
- The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal.
- The appeal will be reviewed by the Title VI Coordinator, Airport Director, or their designee depending on whether the Title VI Coordinator or their designee conducted the initial investigation. If the Title VI Coordinator designates another individual to conduct the investigation, the Title VI Coordinator may review the appeal. If the Title VI Coordinator conducts the investigation, the Airport Director or their designee will review the appeal. The appeal will not be reviewed by the individual who conducted the initial investigation.
- Whoever is designated to review the appeal will issue a final written decision.

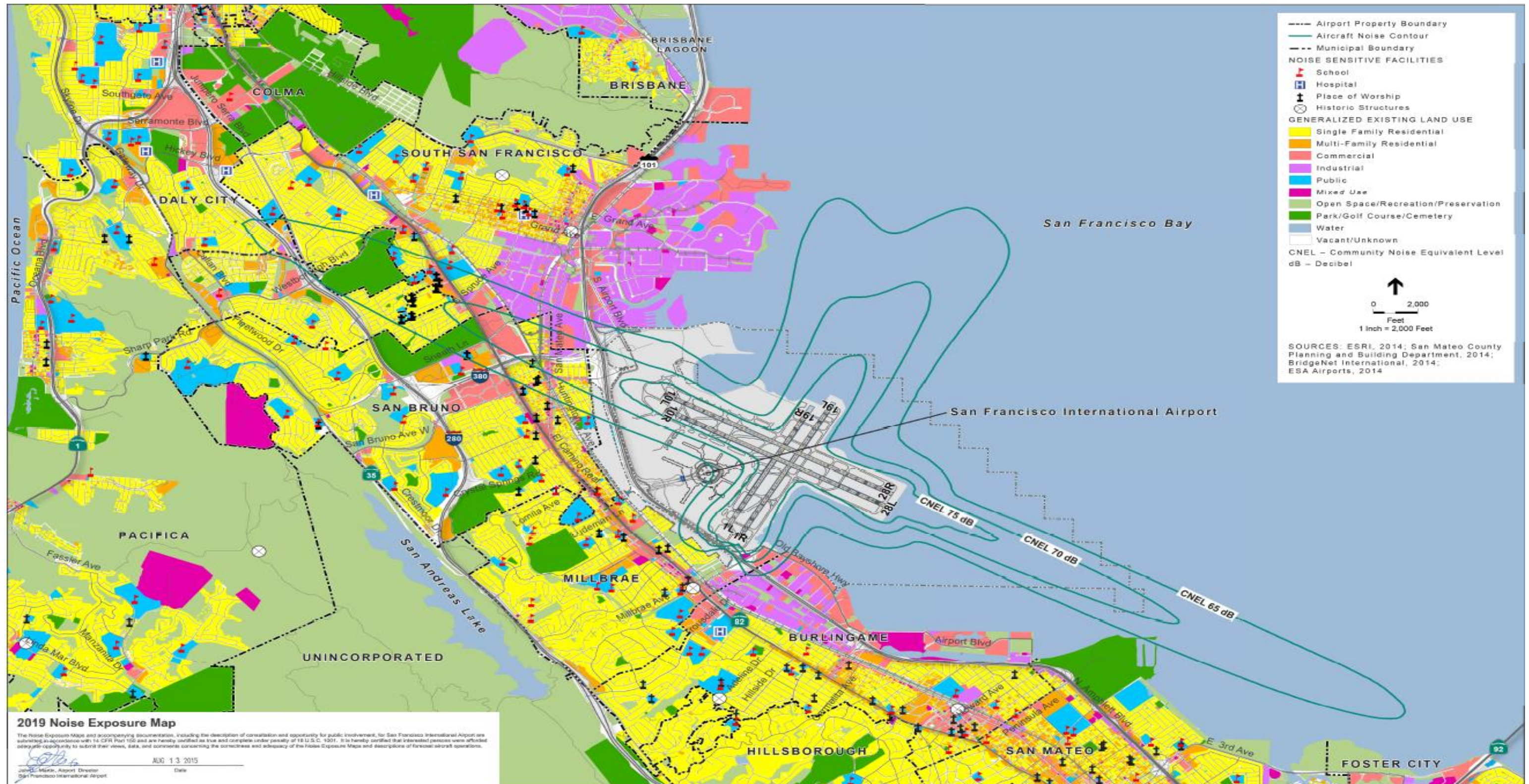
*Avoiding Future Discrimination* In addition to taking action with respect to any specific instances of discrimination, SFO will attempt to identify and implement remedial measures to reduce the likelihood of similar actions in the future.

*Intimidation and Retaliation Prohibited* SFO 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 the DOT/FAA, contact [SFO-TitleVICoordinator@flysfo.com](mailto:SFO-TitleVICoordinator@flysfo.com).

This complaint procedure is shared with the public through the Airport's public-facing website, at <https://www.flysfo.com/about/airport-commission/public-notice/TitleVI/procedures>.

## 15. Appendix A



| 16. Appendix B                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                |                                                     |                                                                                                                       |                                                                                          |                                               |                                                                                                          |                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| "No Airport Sponsor activity must have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken. In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons." |                                                                                                                |                                                     |                                                                                                                       |                                                                                          |                                               |                                                                                                          |                                                                                                    |
| FFY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | PROJECT TITLE                                                                                                  | DOES THIS PROJECT INVOLVE UNDERTAKING CONSTRUCTION? | IF YES, WILL THIS FACILITY BE IN OPERATION, UNDER CONSTRUCTION, OR EXPECTED TO BE IN CONSTRUCTION WITHIN THREE YEARS? | WILL THE OPERATION OF THE PROJECT/FACILITY IMPACT THE AFFECTED COMMUNITY OR COMMUNITIES? | IF YES, WHICH AFFECTED COMMUNITY/COMMUNITIES? | IF YES, WILL THERE BE A DISPARATE IMPACT ON THE BASIS OF RACE, COLOR, OR NATIONAL ORIGIN, INCLUDING LEP? | IF THERE WILL BE A DISPARATE IMPACT, CAN THIS BE MITIGATED? PROVIDE DETAILS WHETHER RESPONDING Y/N |
| 2023 Application                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                |                                                     |                                                                                                                       |                                                                                          |                                               |                                                                                                          |                                                                                                    |
| 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Taxiways A & B Rehabilitation, Phase 1                                                                         | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Boarding Area G Remote Overnight 400 Hz Ground Power Units Replacement                                         | Yes                                                 | Expected to be in use within 3 years                                                                                  | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | BA TR/TS 12 KV Cable Replacement, Phase 1 (12kV Power Distribution Cable Replacement to Substation TR and TS)  | Yes                                                 | Expected to be in use within 3 years                                                                                  | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Runway 10L-28R 5KV Cable Replacement                                                                           | Yes                                                 | Expected to be in use within 3 years                                                                                  | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | International Terminal Building Roof, Exterior Envelope, and PV Upgrades                                       | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | HVAC Improvements at International Terminal Building Central                                                   | Yes                                                 | Currently in use                                                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024 Application                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                |                                                     |                                                                                                                       |                                                                                          |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Runway 1R-19L Rehabilitation                                                                                   | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | eGSE Chargers, Phase 1 (Boarding Area A)                                                                       | Yes                                                 | Expected to be in use within 3 years                                                                                  | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Recycled Water Systems                                                                                         | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Generator Bldg. Replacement for Field Lighting Bldg. No. 1                                                     | Yes                                                 | Expected to be in use within 3 years                                                                                  | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Station BB 12kV Infrastructure Reconfiguration (Redistribute 12KV Infrastructure between Lots D and DD Part 1) | Yes                                                 | Expected to be in use within 3 years                                                                                  | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Terminal 2 Interior Improvements                                                                               | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Plot 10F RON Aircraft Parking and Remote Loading                                                               | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Boarding Area G Gate Enhancements                                                                              | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | International Terminal Building Passenger Improvements                                                         | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2025 Application                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                |                                                     |                                                                                                                       |                                                                                          |                                               |                                                                                                          |                                                                                                    |
| 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Taxiways E and J Reconstruction                                                                                | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Airport EV Chargers, Phase 1                                                                                   | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Terminal 1 Sanitary Sewer Lift Station 1 and 2 and Force Main                                                  | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |
| 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MLTP Sanitary Process Conversion-Nutrient Removal                                                              | Yes                                                 | Expected to be under construction within 3 years                                                                      | No                                                                                       |                                               |                                                                                                          |                                                                                                    |

|                                     |                                                                                                  |     |                                                  |     |                     |    |  |
|-------------------------------------|--------------------------------------------------------------------------------------------------|-----|--------------------------------------------------|-----|---------------------|----|--|
|                                     |                                                                                                  |     |                                                  |     |                     |    |  |
| 2025                                | RAC Electrical Load Center Upgrade (Redistribute 12kv in RAC by Level Part 2)                    | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| <b>2026 Application</b>             |                                                                                                  |     |                                                  |     |                     |    |  |
| 2026                                | Taxiways A & B Rehabilitation, Phase 2                                                           | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| 2026                                | Airfield Lighting 5KV Cable Replacement, Phase 2 (Runway Circuits for Field Lighting Bldg. No 2) | Yes | Expected to be under construction after 3 years  | No  |                     |    |  |
| 2026                                | eGSE Chargers, Phase 2 (Boarding Area C)                                                         | Yes | Expected to be under construction after 3 years  | No  |                     |    |  |
| 2026                                | Industrial Waste Pump Station D and Force Main Replacement                                       | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| 2026                                | Fiber Upgrade Program, Phase 1                                                                   | Yes | Expected to be under construction after 3 years  | No  |                     |    |  |
| 2026                                | BA TR/TS 12KV Cable Replacement, Phase 2 (Electrical Power Distribution Replacement)             | Yes | Expected to be under construction after 3 years  | No  |                     |    |  |
| <b>OTHER (NON-FEDERALLY FUNDED)</b> |                                                                                                  |     |                                                  |     |                     |    |  |
| 2023                                | Energy Management Control System                                                                 | Yes | Currently under construction                     | No  |                     |    |  |
| 2023                                | ITB Phase 2                                                                                      | Yes | Currently under construction                     | No  |                     |    |  |
| 2023                                | Terminal 1 Center                                                                                | Yes | Currently under construction                     | No  |                     |    |  |
| 2023                                | Terminal 3 West Modernization                                                                    | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| 2024                                | Courtyard 3 Connector                                                                            | Yes | Expected to be in use within 3 years             | No  |                     |    |  |
| 2024                                | West Field Garage 675                                                                            | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| 2024                                | Cargo Bldg. 626.1                                                                                | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| 2024                                | West Field Utilities and Paving                                                                  | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| 2024                                | Cargo Bldg. 720.1 and GSE Bldg. 742                                                              | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| 2024                                | Taxiways D and T Reconstruction                                                                  | Yes | Currently under construction                     | No  |                     |    |  |
| 2024                                | Taxiway Z Rehabilitation                                                                         | Yes | Expected to be under construction after 3 years  | No  |                     |    |  |
| 2023                                | Runway 10L-28R Rehabilitation                                                                    | Yes | Currently in use                                 | No  |                     |    |  |
| 2023                                | Effluent Pipeline Replacement to SSF Plant                                                       | Yes | Expected to be under construction within 3 years | Yes | South San Francisco | No |  |
| 2024                                | Terminal Upper-Level Viaduct Resurfacing                                                         | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
| 2024                                | Sanitary Waste Treatment Plant Improvements                                                      | Yes | Currently under construction                     | No  |                     |    |  |
| 2024                                | West of Bayshore Drainage Improvements                                                           | Yes | Expected to be in use within 3 years             | No  |                     |    |  |
| 2024                                | ASIP Phase 2 - CCTV Assessment                                                                   | Yes | Expected to be under construction within 3 years | No  |                     |    |  |
|                                     |                                                                                                  |     |                                                  |     |                     |    |  |