

TITLE VI

LIMITED ENGLISH PROFICIENCY PLAN



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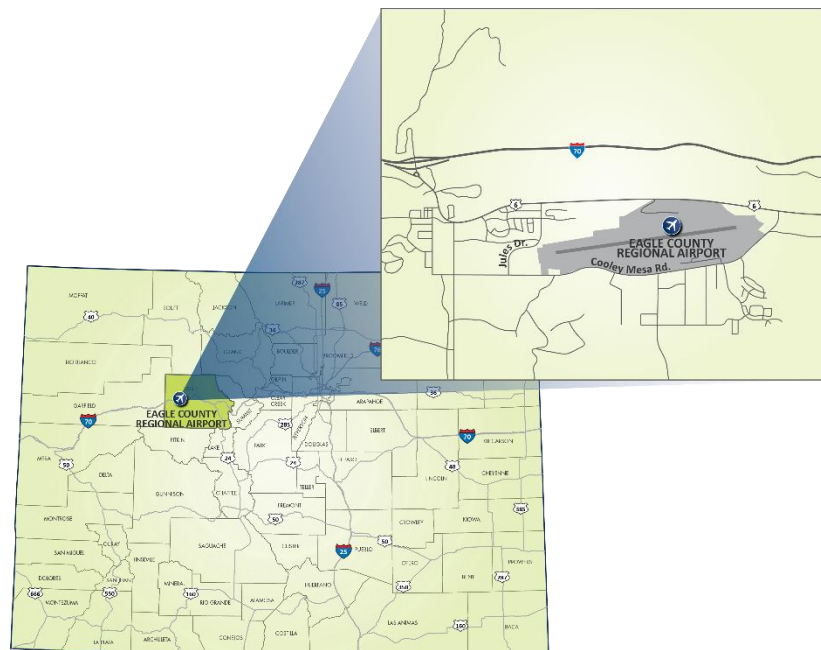
1.0 COMMUNITY STATISTICS

Eagle County Regional Airport is in the town of Gypsum in central west Colorado in the Rocky Mountains, as shown in **Figure 1-1**. Situated in the Eagle River Valley, the Airport sits on a small mesa just south of the Eagle River and is surrounded by mountainous terrain considered the Northern Sawatch Range. Eagle, Colorado is 5 miles east of the Airport along I-70 and Denver, Colorado is a 2-hour drive east on I-70. The Airport sits at an elevation of 6,547 feet and occupies 632 acres of land.¹

EGE is a public-use general aviation and commercial service airport owned and operated by Eagle County, which is governed by a three-member Board of County Commissioners (BoCC). The County owns and maintains the Airport facilities and functions as the Airport Sponsor for federal and state grant funding purposes. Day-to-day operation of the Airport is handled by a dedicated, professional airport management staff. The BoCC designates the Director of Aviation to oversee the day-to-day operation and development of the Airport. Airport staff is responsible for terminal operations, airfield operations, customer service, aircraft rescue and firefighting (ARFF), maintenance, and general administration, among others.²

The Airport provides commercial service through American Airlines, Delta Airlines and United Airlines. EGE is also considered a general aviation airfield, providing space for local aviators. The Airport is categorized as a non-hub primary airport by the FAA, as reflected in the National Plan of Integrated Airport Systems (NPIAS). Non-hub airports receive less than 0.05 percent of the national share of enplanements but enplane more than 10,000 passengers on an annual basis. As of 2021, the Airport served more than 200,000 passengers and had approximately 57,143 annual aircraft operations. Additionally, EGE had approximately 85 based aircraft in 2022.³

FIGURE 1-1: EGE PROXIMITY MAP



The Airport provides the region with aviation facilities designed to accommodate a full range of aviation services and operations including small general aviation aircraft, helicopter High-Altitude Army National Guard

¹ Eagle County Regional Airport Master Plan, Woolpert, Inc., 2023.

² Eagle County Regional Airport Master Plan, Woolpert, Inc., 2023.

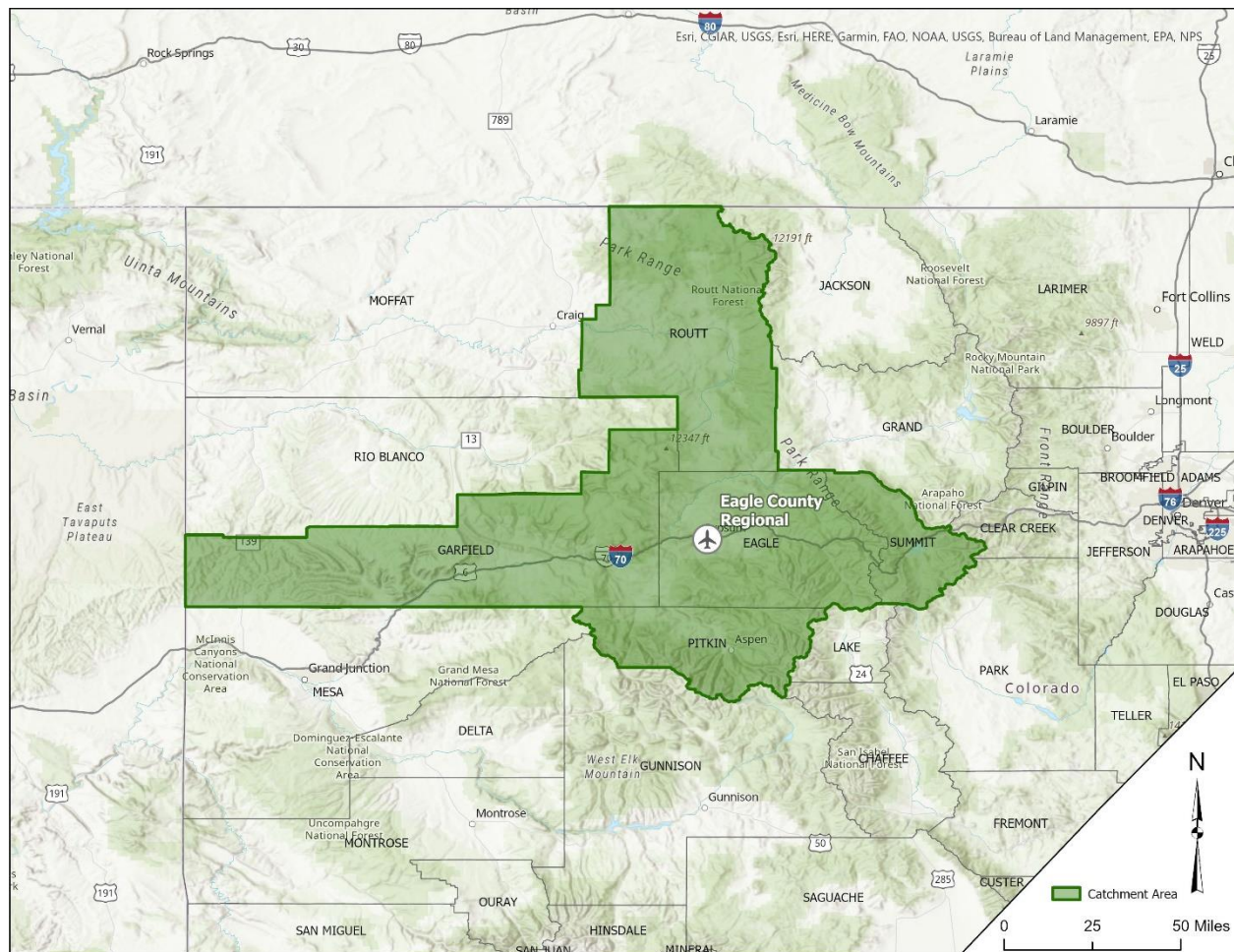
³ Eagle County Regional Airport Master Plan, Woolpert, Inc., 2023.

Aviation Training Site (HAATS) operations for the Colorado Army National Guard, and commercial passenger services. In addition to its many aviation-related benefits, The Airport is a significant community asset as demonstrated by the findings in the *2020 Colorado Aviation Economic Impact Report*, where it was estimated that EGE supports over 5,000 jobs and generates an estimated \$640 million in economic activity.⁴ The Airport's approved budget for airport operations in Fiscal Year 2023 is approximately \$2.9 million, which includes payroll for 35.5 full-time equivalent staff.

1.1 CATCHMENT AREA

As discussed previously, the Airport is in Gypsum in central west Colorado approximately 2 hours west of Denver and 5 miles west of the Town of Eagle. The catchment area represents the area that is deemed reasonable, based on drive times and convenience, to draw passengers to the Airport. The catchment area for the Airport encompasses Eagle County, Routt County to the north, Garfield County to the west, Summit County to the east and Pitkin County to the south. **Figure 1-2** illustrates the catchment area for EGE.

FIGURE 1-2: CATCHMENT AREA



Source: Woolpert, Inc.

⁴ Eagle County Regional Airport Master Plan, Woolpert, Inc., 2023.

1.2 PROTECTED CLASSES

According to the U.S. Census Bureau, from 2017-2021, the Catchment Area had a population of approximately 205,955 persons. This study includes an evaluation of all protected classes, to include persons of minority race, color, national origin, religion, sex, age, or disability. The following tables depict the number of persons within each protected class in the Catchment Area.

TABLE 1-1: RACE/COLOR

Race/Color	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
White	81.4%	80.6%	88.0%	89.4%	87.6%
Black or African American	0.9%	0.5%	0.1%	0.3%	0.2%
Hispanic or Latino	29.4%	29.2%	10.6%	7.0%	14.7%
Two or more races	12.4%	8.2%	7.0%	7.8%	7.3%
Asian	1.4%	0.9%	2.3%	1.2%	1.2%
American Indian and Alaska Native	0.1%	0.6%	0.2%	0.2%	0.3%
Native Hawaiian and Other Pacific Islander	0.1%	0.1%	0.0%	0.0%	0.4%

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

TABLE 1-2: NATIONAL ORIGIN

Birthplace	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
Citizen, US-Born	82.8%	84.3%	86.1%	93.1%	92.1%
Citizen, Born Abroad	1.9%	1.4%	1.9%	1.8%	2.0%
Citizen, Foreign Born	15.3%	14.3%	12.0%	5.1%	5.8%
U.S. Citizenship Status					
Citizen, Naturalized	37.4%	36.4%	66.9%	59.9%	16.5%
Not Citizen	62.6%	63.6%	33.1%	40.1%	83.5%

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

TABLE 1-3: SEX

Sex	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
Male	53.5%	51.3%	53.4%	52.1%	54.1%
Female	46.5%	48.7%	46.6%	47.9%	45.9%

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

TABLE 1-4: AGE

Age	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
Persons under 5 years	5.1%	6.7%	5.8%	4.2%	4.1%
Persons under 18 years	21.4%	25.2%	16.8%	17.5%	16.3%
Persons 65 years and over	12.0%	13.3%	19.3%	16.5%	14.4%

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

TABLE 1-5: DISABILITY

Disability	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
With a disability, age 18-64 years	5.0%	8.0%	8.0%	6.3%	5.4%
With a disability, under age 18 years	1.9%	1.4%	0.0%	2.6%	0.7%

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

1.3 GYPSUM, COLORADO DEMOGRAPHIC DATA

1.3.1 LOCAL COMMUNITY OVERVIEW

The town of Gypsum, Colorado was first settled in 1881 and later incorporated as a town in 1911. The town was named after gypsum deposits that were found in a nearby creek. Gypsum has a strong history of agriculture as well as ranching, which are crucial influences contributing to the growth of the town. Growth from the farming and ranching industry prompted other business ventures like retail stores, blacksmiths, restaurants, and lodging. These businesses formed what is now called Old Town. The railroad service played a vital role for the survival and growth of Gypsum, much like any western American town. Railroad services that contributed to the town's existence were the Denver and Rio Grande Railroad systems.⁵

Today, Gypsum is a Home Rule Municipality with a population around 7,500 residents in Eagle County and is situated along the Eagle River and the I-70 corridor. Outdoor activities are very popular including hiking, fishing, camping, biking, skiing, hunting, and off-highway recreation. Gypsum sits at an elevation of 6,300 feet, where a primary economic driver in the region is mining of local gypsum deposits. Residents enjoy affordable family housing in a great mountain valley setting.⁶

1.3.2 AREA ECONOMY

The percentage of employed civilians by industry for the Catchment Area between 2017-2021 is shown in **Table 1-6**.

TABLE 1-6: INDUSTRY EMPLOYMENT

Industry	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
Agriculture, forestry, fishing and hunting, and mining	2.0%	3.8%	0.9%	4.7%	1.6%
Construction	12.8%	14.0%	8.5%	12.2%	7.9%
Manufacturing	2.4%	3.2%	1.4%	3.0%	4.2%
Wholesale trade	1.4%	2.4%	3.7%	1.6%	3.7%
Retail trade	10.8%	10.3%	8.9%	10.9%	12.7%
Transportation and warehousing, and utilities	3.8%	5.8%	6.4%	3.4%	3.1%
Information	1.1%	1.9%	2.3%	0.6%	0.9%
Finance and insurance, and real estate and rental and leasing	6.5%	7.1%	11.8%	8.1%	8.0%
Professional, scientific, and management, and administrative and waste management services	11.4%	10.9%	12.2%	11.1%	10.5%
Educational services, and health care and social assistance	14.8%	18.9%	18.1%	18.8%	15.5%
Arts, entertainment, and recreation, and accommodation and food services	24.9%	11.2%	18.9%	16.4%	26.1%

⁵ TownofGypsum.com, [History](#), Accessed December 2023.

⁶ TownofGypsum.com, [Community Profile](#), Accessed December 2023.

Industry	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
Other services, except public administration	4.2%	6.3%	3.9%	5.3%	2.2%
Public administration	3.9%	4.2%	3.0%	3.8%	3.9%

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

The estimated percentage for unemployment rates in the Catchment Area between 2017-2021 as compared to the 2017-2021 national unemployment average of 3.5 percent is shown in **Table 1-7**.

TABLE 1-7: UNEMPLOYMENT RATE

Unemployment	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
Civilian labor force Unemployment Rate	2.9%	2.9%	2.1%	1.7%	2.5%

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

The average per capita income (averaged between 2017 - 2021) for the Catchment Area as compared to the national average of \$37,638 and the state average of \$42,807 is shown in **Table 1-8**.⁷

TABLE 1-8: PER CAPITA INCOME

Personal Income	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
Per capita income (dollars)	49,010	35,608	76,883	50,571	48,488

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

The estimated average median household income for the Catchment Area as compared to the national average of \$69,021 and the state average of \$80,184 is shown in **Table 1-9**.⁸

TABLE 1-9: MEDIAN HOUSEHOLD INCOME

Household Income	Eagle County	Garfield County	Pitkin County	Routt County	Summit County
Median household income (dollars)	91,338	77,212	92,708	83,725	93,505

Source: U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

2.0 LIMITED ENGLISH PROFICIENCY

Limited English Proficiency (“LEP”) persons refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The Federal government has determined that the statutory prohibition on discrimination based on national origin requires that Federal agencies and grant recipients provide reasonable language assistance for LEP persons so that such persons may meaningfully access federal and federally assisted programs and activities. Relevant guidance is provided in (i) Presidential Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency* (2000); (ii) Department of Justice *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons* (2002); and (iii) and USDOT *Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons* (2005). This section outlines the reasonable steps EGE should take

⁷ U.S. Census Bureau, [US & Colorado Comparison](#), Accessed December 2023.

⁸ U.S. Census Bureau, [US & Colorado Comparison](#), Accessed December 2023.

to ensure meaningful access to benefits, services, information, and other important portions of Airport programs and activities by individuals who may be considered LEP.

2.1 NUMBER OF LEP PERSONS IN EAGLE COUNTY REGIONAL CATCHMENT AREA

The number of LEP persons in the Catchment Area was estimated using the U.S. Census Bureau's American Community Survey database, as summarized above. Combined, the five (5) counties within the Catchment Area (Eagle County, Routt County, Garfield County, Summit County and Pitkin County) have a population of approximately 190,326 persons. Of these, approximately 83.8 percent on average speak only English and approximately 16.2 percent on average speak a language other than English at home.⁹

Of the non-English languages found within the Catchment Area, the predominant languages include (all percentages are approximate) Spanish or Spanish Creole at 95.3 percent, German at 0.7 percent, African Languages at 0.7 percent, Portuguese/Portuguese Creole at 0.5 percent, French (incl. Patois, Cajun) at 0.5 percent, Other Slavic Languages at 0.5 percent, Japanese at 0.3 percent, Other Asian Languages at 0.3 percent, Korean at 0.2 percent, and Russian at 0.2 percent. All other languages account for 0.1 percent or below of non-English languages spoken. **Table 2-1** reflects the aforementioned percentages which are percentages of the non-English languages found within the Catchment Area. Of the population that speaks a language other than English at home, approximately 16.2 percent on average speak English very well, and approximately 6.3 percent on average speak English less than very well.¹⁰ Languages not found in the Catchment Area include Yiddish, French Creole, Other West Germanic Languages, Scandinavian Languages, Persian, Gujarati, Hindi, Urdu, Other Indo-European Languages, Hmong, Laotian, Vietnamese, Other Pacific Island Languages, Navajo, Hungarian, Arabic, and Mon-Khmer (Cambodian).

TABLE 2-1: CATCHMENT AREA LEP (PERCENT OF NON-ENGLISH LANGUAGES SPOKEN)

Language	Averaged Percent in Catchment Area
Spanish or Spanish Creole	95.3%
German	0.7%
African Languages	0.7%
Portuguese/Portuguese Creole	0.5%
French (incl. Patois, Cajun)	0.5%
Other Slavic Languages	0.5%
Japanese	0.3%
Other Asian Languages	0.3%
Korean	0.2%
Russian	0.2%
Thai	0.1%
Armenian	0.1%
Hebrew	0.1%
Other Indic Languages	0.1%
Polish	0.1%
Greek	0.08%
Tagalog	0.08%
Other Native North American	0.07%
Italian	0.03%

⁹ U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

¹⁰ U.S. Census Bureau, [County Comparison](#), Accessed December 2023.

Language	Averaged Percent in Catchment Area
Serbo-Croatian	0.02%
Chinese	0.01%

Source: LEP.gov, [Limited English Proficiency by County](#), Accessed December 2023.

2.2 FOUR-FACTOR ANALYSIS

A four-factor analysis was conducted pursuant to Department of Justice and USDOT policy guidance to determine the specific language services appropriate to provide, and to whom, to inform language assistance planning and determine if the Airport's communication with LEP persons is effective. The following section summarizes the results of the four-factor analysis.

2.2.1 NUMBER OF LEP PERSONS LIKELY TO BE ENCOUNTERED

It was found that the principal LEP population of concern is ticketed passengers traveling on commercial airlines at the Airport, and, to a lesser extent, "meeters and greeters" and other individuals accessing the Airport and likely to encounter Airport employees.

The LEP.gov 2015 Language App Map database was used to determine the number of LEP persons in the Catchment Area. Of the 190,326 residents in the Catchment Area, approximately 16.2 percent speak languages other than English at home, with the predominant non-English language being Spanish (95.3 percent). Of the population that speaks a language other than English, only 6.3 percent are identified as speaking English "less than very well."

EGE is not an international airport; in the winter, American, Delta and United provide non-stop jet service between EGE and twelve major domestic cities, including Atlanta (ATL), Chicago(ORD), Dallas/Ft. Worth(DFW), Denver(DEN), Houston(IAH), Los Angeles(LAX), Miami(MIA), Newark(EWR), New York/Kennedy(JFK), New York/LaGuardia(LGA), Phoenix(PHX), Salt Lake City(SLC), San Francisco(SFO), and Washington Dulles(IAD). Year-round service includes daily non-stop flights between EGE and Dallas/Ft. Worth on American Airlines. United Airlines offers non-stop daily service to Denver. EGE does not offer international flights. As a result, most passengers originate from cities where English is the primary language.

2.2.2 FREQUENCY OF CONTACT WITH LEP PERSONS

The total number of LEP persons traveling through the Airport as ticketed passengers is estimated to reflect the LEP population in the community, as described above. The following table shows the frequency of contact with LEP individuals at the Airport and Airport-related activities (all languages):

Languages Spoken by LEP Persons	A few times a year (non-winter) (12 or less days a year)	Several times a month (non-winter) (13 to 51 days a year)	Winter Season (Several times a month)	At least once a week (52 to 364 days a year)	Winter Season (At least once a week)	Every day (365 days a year)
Spanish or Spanish Creole	X				X	
French or French Creole						
Italian						
Portuguese or			X			

Portuguese Creole						
German or West Germanic Languages						
Scandinavian						
Russian						
Armenian						
Hindi, Urdu and other Indic Languages						
Chinese						
Japanese						
Korean						
Thai						
Laotian						
Vietnamese						
Other Asian Languages						
Tagalog						
Other Pacific Island Languages						
Arabic						
African Languages						
Other and unspecified Languages						

The estimated frequency of contacts with LEP persons is based on direct observations and experience by County, TSA, Airline, and Airport employees. Several employees were interviewed as part of this study to ascertain the frequency of contacts, which confirmed that the frequency of contacts is low (approximately 3%), and that existing and proposed resources (detailed below) are adequate to provide LEP persons with the necessary services.

Considering the LEP.gov data summarized above, and inquiries made as part of this study, it was found that a sizable portion of LEP persons travelling through the Airport as ticketed passengers are likely to speak Spanish as their primary language, followed by Portuguese.

In summary, based on the continuous monitoring of the Airport generally and the passenger experience, it was found that the frequency of contacts with LEP persons requiring language assistance is low.

2.2.3 NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY, OR SERVICE

The most critical Airport program, activity, or service for which LEP may create a barrier or limitation is passenger security screening. The inability to process a passenger through security screening risks denying access to air travel. Moreover, passenger screening involves multiple steps and requires the ability to obey specific requests and commands from TSA's security screening personnel (e.g., presenting identification, divesting personal items, etc.). As detailed below, support for LEP persons as part of passenger security screening is performed by TSA in accordance with TSA's Language Access Plan.

While less frequent, another critical Airport program, activity, or service for which LEP may create a barrier or limitation is communication during emergencies and irregular operations. Information is provided over the Airport's public address system or verbally by law enforcement officers, airlines, and other Airport employees.

Finally, the most common Airport program, activity, or service for which LEP may create a barrier or limitation is directional assistance (e.g., directions to ticketing, baggage claim, ground transportation, rental cars, restrooms, etc.). While inadequate directional assistance does not typically create a risk to a passenger's ability to engage in air travel, it may degrade the passenger experience and disrupt travel. Directional assistance typically is provided by Airport employees and directional signage is in place using international recognized symbols.

2.2.4 RESOURCES AVAILABLE AND COSTS IMPOSED

The Airport is categorized as a non-hub primary commercial service airport by the FAA, as reflected in the National Plan of Integrated Airport Systems. As of 2023, the Airport served approximately 232,215 total passengers. The Airport's approved budget for Airport operations in Fiscal Year 2024 is approximately \$11 million, which includes payroll for 36 full-time equivalent staff.

The Airport stations paid staff or volunteers in the Airport Terminal for the purpose of providing customer service or assistance. The Airport Administration office is currently located outside the Airport Terminal, but plans are to move the office inside the Airport Terminal building. The Administration office at its current location is available to the public. Airport staff regularly travel through the Terminal and interact with ticketed passengers, "meeters and greeters" and others.

The Airport has existing resources, both employees and revenue, to commit to language assistance for LEP persons. However, the assessment of the first three factors above reveals that minimal resources and expenses are needed to ensure access to Airport programs, activities, or services by LEP persons.

As mentioned, support for LEP persons at the security screening checkpoint is provided by TSA in accordance with TSA's Language Access Plan, the current version of which is the Supplementary Update Covering Fiscal Years 2020-2022, found at <https://www.dhs.gov>. As stated in TSA's Plan, "The two primary methods of providing language access to the traveling public through the Security Operations-implemented Language Access Program are the Language Access Binder and the self-certified Language Access Program volunteers." TSA Language Access Plan at 5.

Further, the Department of Homeland Security ("DHS") employs "I Speak" materials and resources to help identify primary languages spoken by LEP persons who may be victims of a crime, including human trafficking. The "I Speak" materials include a poster and booklet, and DHS further makes translation services available once a determination is made about the person's primary language.

3.0 LANGUAGE ASSISTANCE MEASURES

The following language assistance measures are reasonable and in place at the Airport:

- Provision of translation and interpretive services at public meetings (upon request or as determined by Airport staff to be necessary or supportive of expected LEP persons)
- Provision of on-call contract translation services as needed
- Provision of safety and security announcements in English and Spanish throughout the Commercial Terminal Facility
- Training of Airport staff, concessionaires, and tenants on the use of Google Translate to assist LEP persons

- Maintenance of records of Airport staff, concessionaires, and tenants who are fluent or possess skills in any language besides English
- Coordination with TSA to ensure that the Language Access Binder is available and used at the Airport and customized as appropriate to reflect the specific language assistance needs of LEP persons using the Airport
- Coordination with TSA to identify TSOs who serve as Language Access Program volunteers
- Maintenance of copies of the DHS “I Speak” poster and booklet in the Airport Administration Office
- Updated Airport Emergency Plan to ensure that it addresses the needs of LEP persons during an emergency