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Interstate Bridge Replacement (IBR) Program Language Access Plan (LAP)

Updated March 2025

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PURPOSE

This Language Access Plan (LAP) outlines how the Interstate Bridge Replacement program (IBR) provides meaningful access for individuals with Limited English proficiency (LEP), defined as those who have a limited ability to read, speak, write, or understand English. This LAP uses the results of the Four-Factor Analysis to determine the LEP languages for the IBR program metro area. As a recipient of federal financial assistance, the IBR program is required to take reasonable steps to ensure meaningful access to its programs, activities, and services to individuals with LEP as described in Title VI of the Civil Rights Act of 1964.

This LAP furthers the program's implementation of its federal civil rights compliance and nondiscrimination commitment as expressed in its Title VI Policy:

"It is the IBR program's policy to ensure that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of or be otherwise discriminated against under any of its programs and activities...."

Beyond compliance, the IBR program is committed to centering equity and using best and emerging practices, including in language access, in service of the program's broader commitment to equity. To this end, the program has identified LEP communities as an equity priority community. This LAP will further include provisions for members protected under the Americans with Disabilities Act (ADA) to provide language access to deaf, hard of hearing, and deaf-blind (D/HH/DB) individuals who come in contact with the IBR program.

FOUR FACTOR ANALYSIS

Overview

As described by the Federal Transit Administration (FTA) and US Department of Transportation (USDOT), a Four Factor Analysis provides the foundation for this LAP (FTA 2012; USDOT 2005). This analysis is designed to establish the minimum requirements for an LAP, but agencies can choose to implement additional elements to better include their LEP communities. The Four Factor Analysis includes the following:

1. The **number or proportion** of persons with LEP eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The **frequency** with which individuals with LEP come in contact with the program.
3. The **nature and importance** of the program, activity, or service provided by the recipient to people's lives.
4. The **resources** available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Since IBR has multiple partnering agencies that have their own findings and respective language access programs, this LAP considers their policies and practices while customizing them to the specific needs of the IBR program. WSDOT and ODOT are jointly leading the IBR program work in collaboration with eight regional partner agencies from Oregon and Washington. The regional partner agencies include TriMet, C-TRAN, Oregon Metro, Southwest Washington Regional Transportation Council, City of Portland, City of Vancouver, Port of Portland, and Port of Vancouver USA.

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Analysis

Factor One: Proportion of Persons with LEP Eligible to be Served or Likely to be Encountered by the Program

The unique nature of the IBR program requires a comprehensive analysis of LEP populations within the program area, those eligible to be served and those *likely* to be impacted by the program's outcomes. When considering the number or proportion of individuals with LEP in a service area, recipients should consider parents with LEP whose minor children or dependents may be English proficient or LEP and who encounter the services of DOT recipients. For this reason, this analysis includes data from the American Community Survey (ACS) and also folds in verifiable data from the IBR Program partners: Washington State Department of Transportation (WSDOT), Oregon Department of Transportation (ODOT), TriMet, C-Tran, Vancouver Public Schools and Portland Public Schools. By incorporating these data and practices into the IBR program's LAP, the program ensures inclusivity in the furtherance of its commitment to equity.

Federal agencies under USDOT (which includes FAA, FHWA and FTA) have adopted the United States Department of Justice's (USDOJ) Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision applies to this LAP and stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

Translation of non-vital documents, if needed, can be provided upon a 72-hour request, translation will be provided in writing or using oral interpretation. The IBR Program will provide meaningful access to individuals with LEP through competent oral interpreters where oral language services are needed and are reasonable.

American Community Survey Data

While the IBR program will most directly encounter nearby communities, it will also serve and impact residents throughout the Portland-Vancouver-Hillsboro Metro area who travel through or within the corridor. Therefore, the Factor One analysis includes data from the American Community Survey for the Portland-Vancouver-Hillsboro Metro Area.

Figure 1: IBR Program Area within the Portland-Vancouver-Hillsboro Metro Area

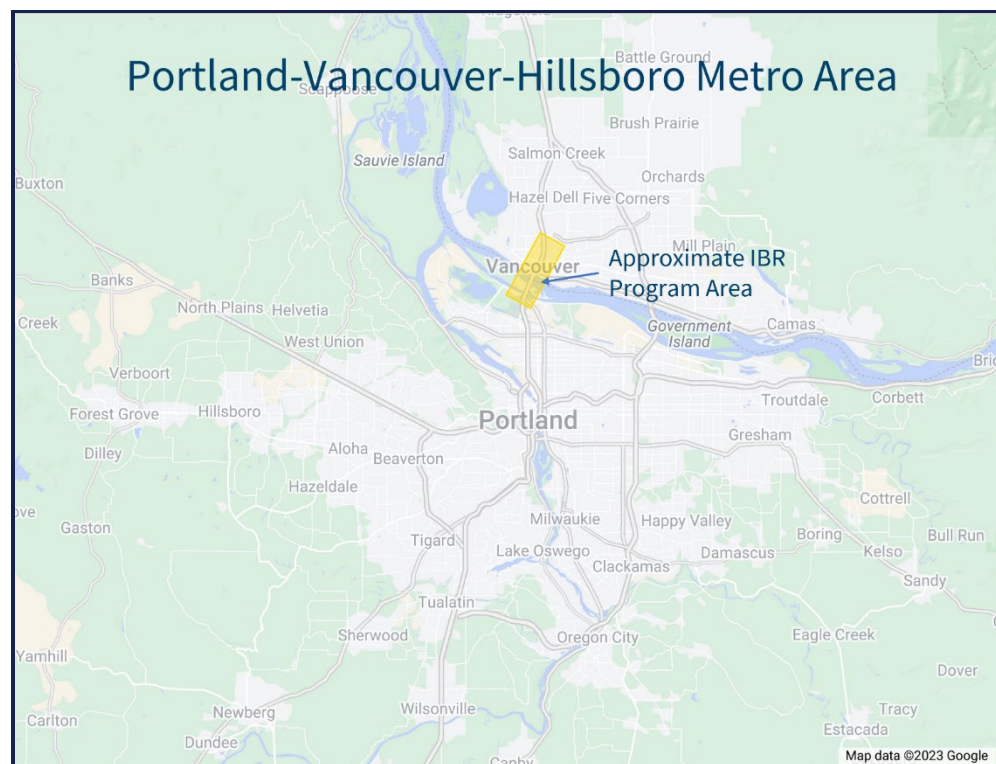


Table B16001 from the ACS provides the most detail in this regard. This table provides population data for a total of 42 languages and language groups¹ in the area. Data from the 2023 ACS shows that an estimated² 18% of residents in the greater Portland-Vancouver-Hillsboro Metro area speak a language besides English. Most of this population reports speaking English “very well” on the ACS, while 36% meets the LEP definition.

Examining exclusively the ACS data, no language meets the 5% Safe Harbor threshold; however, 17 languages meet the threshold by having at least 1,000 individuals of limited English proficiency in the community. Those languages, in order of prevalence, are represented in Table 1. The complete table, including languages that did not meet either the 5% or 1,000 individual Safe Harbor threshold, is attached to this LAP as Exhibit A.

¹ Language groups are defined as any instance in which more than one language is listed within a single data point (e.g. “Thai, Lao, or other Tai-Kadai languages”).

² Because the ACS uses sampling, there are margins of error that are greater when analyzing smaller population sizes, which must be considered when reviewing the data. Also note that the Census Bureau reports significant undercounts of several populations of color, likely impacting accuracy of LEP data collected for the ACS.

Table 1: “Languages Spoken at Home by Ability to Speak English³ for the Population 5 Years and Over” in the IBR Program Area and Portland-Vancouver-Hillsboro Metro Area at or above Safe Harbor

	# within Metro Area	% of Total Population within Metro Area
Total	2,387,602	
Speak only English	1,959,739	
Spanish speakers (all)	217,245	3.40%
Spanish speakers (LEP)	81,089	
Chinese (incl. Mandarin, Cantonese) (all)	31,679	0.63%
Chinese (incl. Mandarin, Cantonese) (LEP)	15,142	
Vietnamese speakers (all)	23,785	0.56%
Vietnamese speakers (LEP)	13,439	
Russian (all)	18,987	0.32%
Russian (LEP)	7,525	
Ukrainian or other Slavic languages (all)	8,171	0.20%
Ukrainian or other Slavic languages (LEP)	4,846	
Korean (all)	8,426	0.18%
Korean (LEP)	4,240	
Arabic speakers (all)	7,249	0.12%
Arabic speakers (LEP)	2,919	
Japanese (all)	8,236	0.11%
Japanese (LEP)	2,683	
Thai, Lao, or other Tai-Kadai languages (all)	5,576	0.10%
Thai, Lao, or other Tai-Kadai languages (LEP)	2,279	
Amharic, Somali, or other Afro-Asiatic Languages (all)	7,284	0.09%
Amharic, Somali, or other Afro-Asiatic Languages (LEP)	2,206	
Tagalog (incl. Filipino) (all)	9,508	0.08%
Tagalog (incl. Filipino) (LEP)	1,933	

³ Limited English Proficiency (LEP) defined as persons who speak English less than “Very Well.”

	# within Metro Area	% of Total Population within Metro Area
Ilocano, Samoan, Hawaiian or other Austronesian Languages (all)	7,220	0.08%
Ilocano, Samoan, Hawaiian or other Austronesian Languages (LEP)	1,899	
Other languages of Asia (all)	4,458	0.08%
Other languages of Asia (LEP)	1,869	
German (all)	8,462	0.06%
German (LEP)	1,435	
Persian (incl. Farsi, Dari) (all)	3,788	0.05%
Persian (incl. Farsi, Dari) (LEP)	1,303	
Other Indo-European languages (all)	6,159	0.05%
Other Indo-European languages (LEP)	1,298	
Khmer (all)	3,156	0.05%
Khmer (LEP)	1,192	

Source: 2023 American Community Survey 1-Year Estimate, table B16001

While ACS data is valuable, it has limitations. First, ACS has large margins of error of such significance that it could alter whether a language meets the Safe Harbor threshold. Additionally, several undefined language groups that meet the Safe Harbor threshold require additional data points for deeper examination. For these reasons, the IBR program looks to state and local partners to enhance its own Factor One analysis.

Washington and Oregon Departments of Transportation

WSDOT's LAP provides data for both the state and by county. The county data is sourced from the Washington Office of Superintendent of Public Instruction (OSPI).⁴ For this analysis, data from Clark County is considered because it is consistent with the IBR program area. For Clark County, the number of LEP students is represented in Table 2.

Table 2: Estimated Number of LEP Speakers by Language of Origin in Clark County, WA

Language	# of Students	Household Size Used in Estimation	Estimated Number of LEP Speakers by Language
Chinese-Mandarin	372	2.68	996

⁴ [WSDOT Language Access Plan](#)

Language	# of Students	Household Size Used in Estimation	Estimated Number of LEP Speakers by Language
Chuuk/Chuukese	639	4.41	2,819
Russian	2,517	2.38	5,978
Spanish	7,443	3.33	24,785
Ukrainian	1,030	2.66	2,737
Vietnamese	610	3.39	2,068

Source: Washington Office of the Superintendent of Public Instruction (OSPI) as collected and reported from the Washington State Office of Financial Management, 2024⁵

ODOT's Factor One analysis divides the state into five regions, with the Oregon-side of the IBR program area being included within Region 1. ODOT relies on ACS Table C16001 for their Factor One analysis by region, and highlights that Region 1 is the most linguistically diverse region in the state (Table 3):

Table 3: Statewide Percentage of Language Speakers in Oregon⁶

Area	Number (and Percent) of Area's Individuals with LEP who Speak Spanish Languages	Number (and Percent) of Area's Individuals with LEP who Speak Other Indo-European Languages	Number (and Percent) of Area's Individuals with LEP who Speak Asian and Pacific Island Languages	Number (and Percent) of Area's Individuals with LEP who Speak All Other Languages
ODOT Region 1	57,184 (47%)	17,583 (15%)	39,340 (33%)	6,510 (5%)
ODOT Region 2	50,548 (79%)	4,450 (7%)	8,243 (13%)	1,116 (2%)
ODOT Region 3	7,136 (72%)	987 (10%)	1,648 (17%)	159 (2%)
ODOT Region 4	7,900 (85%)	770 (8%)	548 (6%)	33 (0%)
Oregon	132,441 (62%)	24,020 (11%)	50,035 (23%)	7,932 (4%)

Source: 2019-2023 American Community Survey, Table C16001

Transit Partners

C-TRAN has collected data to identify specific languages spoken at home by LEP populations by those within C-TRAN's public Transportation Benefit Area (PTBA), reflected in Table 4. Notably, C-TRAN relies entirely on ACS data for their Factor One analysis but uses the broader Table C16001 that delineates fewer languages. Therefore, their findings are consistent with those previously shared.

⁵ [Washington State Office of Financial Management LEP Population Estimates](#)

⁶ [ODOT Language Access Plan](#)

Table 4: Languages Spoken at Home by English Speaking Ability within C-TRAN's PTBA⁷

Language	Speaks English Very Well	%	Speaks English Less Than Very Well	%	Total	%
English	305, 412	82.5%	-	-	305,412	82.5%
Spanish	16,207	4.4%	10,375	2.8%	26,582	7.2%
French, Haitian, or Cajun	917	0.2%	71	0.1%	917	0.3%
German or other West Germanic languages	1,092	0.3%	79	0.0%	1,171	0.3%
Russian, Polish, or other Slavic languages	7,454	2.0%	6,508	1.8%	13,962	3.8%
Korean	673	0.2%	678	0.2%	1,351	0.4%
Chinese (Mandarin and Cantonese)	1,917	0.5%	1,719	0.5%	3,636	1.0%
Vietnamese	1,180	0.3%	1,777	0.5%	2,957	0.8%
Tagalog	1,066	0.3%	351	0.1%	1,417	0.4%
Arabic	678	0.2%	185	0.0%	863	0.2%
Other Indo-European languages	3,963	1.1%	1,536	0.4%	5,499	1.5%
Other Asian and Pacific Island languages	2,786	0.8%	2,050	0.6%	4,836	1.3%
Other and unspecified languages	1,205	0.3%	305	0.1%	1,510	0.4%

Source: 2018-2022 American Community Survey, Table 16001, as reported by C-TRAN

In addition to using ACS data, TriMet also uses information from the Oregon Judicial Department (OJD) to determine LEP population needs in the state.⁸ OJD's current LAP for 2022-2026 provides information regarding translation and interpretation requests (Table 5):

⁷ [C-TRAN's 2024 Title VI Program](#)

⁸ [TriMet's 2022 Title VI Program Update](#)

Table 5: Top 10 Court Languages Service Requests within the State of Oregon, 2019⁹

Language	# of Persons	Language	# of Persons
Spanish	31,313	Arabic	480
American Sign Language* ¹⁰	1,430	Somali	322
Chuukese	987	Mandarin	233
Russian	942	Mam	228
Vietnamese	510	Bosnian	117

Source: Oregon Judicial Department, LAP 2022-2026

Although this information is state-wide, OJD provides the top language requests by county in their LAP. Three of these counties – Multnomah, Washington, and Clackamas – overlap or directly surround the IBR program area (Table 6). These three counties represent 20,136 of the total 38,520 (or 52%) interpreter requests in the reported year.¹¹ This data is significant in that it demonstrates languages of repeated need in and around the program area; however, it is only representative of a limited cross-section of the population (one that is both LEP *and* is participating in the judicial system).

Table 6: Top Language Requests by County (In Order by Number of Requests)

Multnomah County	Washington County	Clackamas County
Spanish	Spanish	Spanish
Russian	American Sign Language (ASL) ¹²	Russian
Chuukese	Somali	Chuukese
Vietnamese	Arabic	American Sign Language (ASL)
Somali	Chuukese	Mixteco

Source: Oregon Judicial Department LAP, 2022-2026

⁹ [Oregon Judicial Department Language Access Plan 2022-2026](#)

¹⁰ American Sign Language (ASL) falls under Americans with Disabilities Act (ADA) compliance, not under LEP

¹¹ Ibid.

¹² ASL is not an LEP language, it is covered under the ADA.

Vancouver and Portland Public Schools

Vancouver Public Schools collects LEP data by family, tracking which families require language access services and for what language (Table 7). As of January 2025, the top languages requiring language access services in the district are:

Table 7: Number of LEP Families within the Vancouver Public Schools District as of January 2025¹³

Language	# of LEP Families within District
Spanish	2507
Chuukese	544
Russian	423
Ukrainian	243
Vietnamese	60
Arabic	57
Chinese (Mandarin and Cantonese)	44
Persian (Farsi and Dari)	22
American Sign Language	21

Source: Vancouver Public Schools, provided January 2025

Vancouver Public Schools website states that 3000 students are multilingual representing 98 languages. The school district has bilingual family liaisons/interpreters in Spanish, Russian/Ukrainian, and Chuukese.

Portland Public Schools also reports annual enrollment by primary language across the district (Table 8).¹⁴ While the data does not specify the students' level of English proficiency, and only identifies the primary language, it is consistent with the data collected by ACS.

Table 8: Portland Public Schools Annual Enrollment by Primary Language 2024-2025

Primary Language	# of Students	Percentage of School District Population
English	37,936	86%

¹³ Note: This table does not account for duplicate entries of families with more than one child enrolled in the school district.

¹⁴ [Portland Public School District Enrollment by Language, 2024-2025](#)

Primary Language	# of Students	Percentage of School District Population
Spanish	3,362	8%
Vietnamese	581	1%
Chinese	366	1%
Russian	250	1%
Somali/Maay-Maay	205	<1%
Japanese	124	<1%
Other	1,262	3%

Source: Portland Public Schools, Data and Reports, accessed January 2025

Summary of Factor One Findings

Cross-referencing data between ACS and additional sources used to inform the LAPs of TriMet, C-TRAN, WSDOT, ODOT, Portland Public Schools, and Vancouver Public Schools, enabled this analysis to ascertain more granular insight into the LEP community population in the IBR program area. While the data across organizations largely align with ACS, one language that is not reflected in the ACS data emerges as one of repeated need across several IBR program area agencies: Chuukese. As a language grouped within “Other Austronesian languages” on the ACS B16001, or within “Other Asian and Pacific languages” on the broader C16001, the more precise data obtained by additional sources confirms a high population of Chuukese individuals with LEP within the program area.

Ultimately, a total of 14 specific languages were identified and substantiated by multiple data sources as meeting the Safe Harbor threshold criteria in the program area. These languages are:

- Spanish
- Chinese
- Vietnamese
- Russian
- Ukrainian
- Korean
- Arabic
- Japanese
- Somali
- Tagalog
- Chuukese
- German
- Persian/Farsi
- Khmer

Factor Two: Frequency with which Persons with LEP come into Contact with the Program

The community engagement program values equity, diversity, accessibility, transparency, and inclusion. The IBR program's core goal is to ensure equity in both processes and outcomes. The program area contains some of the most diverse areas in Oregon and Washington. The program strives to reflect that diversity and uplift it.

Drivers take approximately 143,400¹⁵ trips per day across the Interstate Bridge, making its replacement impactful to millions – both during planning and construction and once complete. While data is not available to determine the proportion of these travelers who are LEP, the ACS does provide estimates of the number of commuters living in the program and Metro areas. As shown in Table 9, an estimated 88,678 LEP workers travel from their homes located within the Portland-Vancouver-Hillsboro Metro Area.

Table 9: Estimated number of LEP commuters living in the Portland-Vancouver-Hillsboro Metro Area

	# of Metro Area Commuting Residents
Total	1,290,916
Speak only English	1,041,749
Spanish-speaking commuters (all)	121,785
Spanish speaking commuters (LEP)	48,139
Other language speaking commuters (all) ¹⁶	127,372
Other language speaking commuters (LEP)	40,539
Total speakers of languages other than English (all)	249,157
Total speakers of languages other than English (LEP)	88,678

Source: 2019-2023 American Community Survey 5-Year Estimate, Table B08513

IBR Program Engagement

Given that transportation projects have historically disenfranchised equity-priority communities, the IBR program aspires to center equity as outlined in the IBR Equity Framework. As such, the IBR program has made a concerted effort to engage LEP communities. This includes translations available for the IBR website, shown in Table 10:

¹⁵ ODOT/WSDOT, Metro RTC Regional Travel Demand Model, IBR Transportation Technical Report, September 2024

¹⁶ The ACS does not provide further specificity of languages spoken by commuters beyond Spanish and “Other”.

Table 10: IBR Engagement in languages besides English, IBR website

Engagement method	Reach Oct 2022 to Oct 2023	Reach Oct 2023 to Oct 2024	Total	%
Translated IBR website – Total ¹⁷	137	301	438	
Translated IBR website – Spanish	62	109	171	39%
Translated IBR website – Chinese (Traditional and Simplified)	18	31	49	11%
Translated IBR website – Russian	25	42	67	15%
Translated IBR website – Ukrainian	4	16	20	4.5%
Translated IBR website – Korean	10	32	42	9.5%
Translated IBR website – Japanese	4	18	22	5%
Translated IBR website – Somali	14	32	46	10.5%
Translated IBR website – Vietnamese	N/A	21	21	4.8%

Source: IBR Web Team, provided November 2024

Relying solely on IBR’s website translation is insufficient for Factor Two analysis, as the website is limited to languages that are available for AI translation. Consequently, several languages prevalent in the Metro and IBR program area are not accounted for in this list. For this reason, additional data from the IBR program is needed. Data from the program’s Community Engagement team proves helpful in this area.

In Fall 2024, the IBR Community Engagement Team collected data during the public comment period for the Draft Supplemental Environmental Impact Statement (SEIS). During this time, the IBR program hosted multiple open house events, at which community members could submit public comments. The Community Engagement Team recorded the number of Individuals with LEP engaged, including the number they assisted in completing online and printed public comment forms (Table 11):

¹⁷ Website translation figures reflect the number of individual visitors that clicked the “Translate” button from October 2022-October 2024.

Table 11: Number of Individuals with LEP Assisted in Participating in the Draft SEIS Public Comment Period

Language	# of Individuals Assisted	Language	# of Individuals Assisted
Chinese	58	Somali	5
Vietnamese	39	Arabic	5
Filipino (Tagalog)	24	Korean	4
Russian	9	Chuukese	3

Source: IBR Community Engagement Team, provided January 2025

Transit Partner Data

In addition to the IBR program’s own translation efforts and needs, it is beneficial to consider the needs in translation/interpretation services reported by TriMet and C-TRAN, as the transit agencies servicing the IBR program area. While WSDOT and ODOT track similar data, it is not localized to the IBR program area; therefore, they are not being considered in Factor Two of this analysis.

TriMet’s call center and website translation traffic are reflected in Table 12, while C-TRAN’s translation requests are reflected in Table 13.

Table 12: TriMet's Language Assistance Requests for Call Center and Website

Language	# of Call Center Language Assistance Requests	% of Total Call Center Language Assistance Requests	# of Website Translated Page Views	% of Total Translated Views
Spanish	7,245	70%	23,651	53%
Russian	1,432	14%	4,985	11%
Chinese (Mandarin and Cantonese)	423	4%	6,829	15%
Arabic	318	3%	N/A	-
Vietnamese	289	2%	4,597	10%
Korean	115	1%	4,712	11%
Somali	110	1%	N/A	-

Language	# of Call Center Language Assistance Requests	% of Total Call Center Language Assistance Requests	# of Website Translated Page Views	% of Total Translated Views
Farsi	74	1%	N/A	-
Other ¹⁸	376	4%	N/A	-

Source: TriMet's 2022 Title VI Program Update¹⁹

Table 13: C-TRAN Translation Requests by Phone 2022-2024²⁰

Language	2022 Instances	2023 Instances	2024 Instances	Total
Spanish	22	10	5	37
Farsi	3	0	1	4
Korean	0	1	0	1
Punjabi	1	1	1	3
Russian	0	2	0	2
Ukrainian	2	1	3	6

Source: C-TRAN's Title VI Program 2024

Factor Three: Nature and Importance of the Program, Activity, or Service Provided by the Program to People's Lives

The connectivity provided by the Interstate 5 and the Interstate Bridge establishes vital linkages from where people live to where they work, learn, and access healthcare and other essential services. Interstate 5 also provides a critical connection between Oregon and Washington that supports local jobs and families and is a vital trade route for regional, national and international economies. This thoroughfare is vital for access to emergency care, public safety and evacuation and the consequences of delayed information in these situations could be life-threatening. It is therefore critical to engage Persons with LEP and equity priority

¹⁸ Other languages are not further specified, nor are any languages beyond those specifically included within Table 10 available for website translation.

¹⁹ [TriMet's 2022 Title VI Program Update](#)

²⁰ [C-TRAN's 2024 Title VI Program](#)

communities to inform program design, keep them informed of key activities in the corridor throughout construction and ensure sufficient mitigation for adverse impacts.

The Interstate Bridge Draft SEIS estimates sizable increases in Individuals with LEP commuting by personal vehicle (3% to 20%, average and peak) and by transit (43% to 67%, average and peak) as a result of replacing the I-5 bridge.²¹ The significant difference estimated between the growth of LEP commuters by personal vehicle versus by transit further underscores the importance of considering LEP populations reported by TriMet and C-TRAN under Factor Two.

Factor Four: Resources Available to the Recipient for LEP Outreach, as well as the Costs Associated with that Outreach

The IBR program has dedicated and will continue to allocate significant resources to language accessibility. The program has partnered with the Immigrant and Refugee Community Organization (IRCO) International Language Bank to provide translation of materials and interpretation at public meetings. Costs associated with these services are shown in Table 14. Additionally, the IBR program will implement a language line to provide real time three-way translation and meaningful access to IBR program information. The cost for the language line has not yet been determined because this will have to be completed through a procurement process.

Table 14: Costs and Resources Associated with LEP engagement, September 2020-February 2025

Service	Cost	Budgeted Resources	Amount Spent
Document translation	\$65 for documents 250 words or less, then \$0.20 - \$0.40 per-word rate based on language. Slide decks average \$275.	\$64,800.0022	\$43,723.29
Live interpretation	\$60/hour for consecutive, \$74/hour for simultaneous. Evening and weekend rates add an additional \$10/hour.	Shared with above.	Shared with above.
Closed captioning (English and Spanish)	\$160/hour	\$61,500.00	\$24,090.00

Source: IBR Program Administrative Team, provided January 2025

²¹ [IBR Draft Environmental Impact Statement, Section 3.5 “Neighborhoods and Equity,” 2024.](#)

²² An additional \$150,000 was budgeted separately for translation of the Draft Supplemental Environmental Impact Statement.

LANGUAGE ACCESS FOR INDIVIDUALS WITH DISABILITIES

As previously stated, Title VI of the Civil Rights Act protected groups include race, color and national origin. To honor the IBR Equity Framework and ensure broadly inclusive access, this LAP considers communities beyond those traditionally considered under Title VI. The Americans with Disabilities Act of 1990 ensures the rights of individuals with disabilities to have equal access to participate in public programs. For this reason, the IBR program includes this community and their unique language access needs under its commitment to adhere to the ADA requirements.

The Portland-Vancouver-Hillsboro Metro Area has a significant population of individuals with disabilities, including those with hearing or vision difficulty who have specific needs for information access. The population of these three groups is represented in Table 15.

Table 15: Disability Characteristics in the Portland-Vancouver-Hillsboro Metro Area

Label	Total	# with a disability	% of total population
Total civilian noninstitutionalized population	2,493,287	321,507	12.9%
With a hearing difficulty ²³		92,101	3.7%
With a vision difficulty ²⁴		52,012	2.1%

Source: 2019-2023 American Community Survey 5-Year Estimate, Table S1810

²³ Defined as “deaf or having serious difficulty hearing.” ([Census.gov](https://www.census.gov))

²⁴ Defined as “blind or having serious difficulty seeing, even when wearing glasses.” ([Census.gov](https://www.census.gov))

TRANSLATION AND INTERPRETATION POLICIES

Based on the results of the LEP Four-Factor Analysis, IBR will adhere to the following languages, to ensure LEP individuals have meaningful access to IBR Program vital information as well as language accessibility while honoring the IBR program's equity-centered approach:

Priority Languages Policy

Priority Languages

LEP languages include those that meet the Safe Harbor threshold and have the highest population numbers and frequency of contact. IBR will translate vital written materials (as defined in this document) into the following languages as standard practice. These languages represent the results of the Four-Factor Analysis and an equitable representation of those meeting the Safe Harbor threshold, languages identified as meeting the LEP requirements by the IBR Program.

- Spanish
- Arabic
- Chinese (Traditional)
- Korean
- Somali
- Russian
- Vietnamese

Vital Written Materials Policy

A document will be considered vital if it contains information that is critical for decision-making, accessing services, participation in activities, or is required by law. Examples of vital written materials include, but are not limited to:

- Public notices of meetings, public comment periods, engagement opportunities, and events.
- Public notices of community benefits, grants, or funding opportunities.
- Public notices of fare/toll increases, anticipated disruptions to traffic roadways, business access, pedestrian routes or public transportation services due to IBR project activities.
- Consent and complaint forms.
- Notices of rights and disciplinary action.
- Emergency communications that relate to health or safety.
- Notices with eligibility deadlines that impact inclusion or exclusion from a program or opportunity.
- Notices of the availability of free language assistance.

Additionally, the program will provide translation of vital documents into any other language upon request.

Multi-lingual Engagement Policy

As required by the ADA, the IBR program will continue to provide closed captioning and American Sign Language interpretation at all public meetings held virtually. The program will further make every effort to provide interpreters in other languages for public meetings upon request within 72-hours. IBR will also continue to make intentional efforts to engage LEP communities (virtually and in-person) by partnering with community organizations serving them.

Responsiveness to Requests for Language Access Plan

Members of the public can request a copy of this LAP through a variety of channels:

1. By calling the IBR program at: 360-859-0494 (Washington), 503-897-9218 (Oregon), or 888-503-6735 (toll-free).
2. By completing the online form at <https://www.interstatebridge.org/contact>.
3. By emailing the IBR Civil Rights and Equity Office at TitleVI@interstatebridge.org.

COMPLAINTS AND INVESTIGATIONS

The investigations process of any language access complaint follows the process for any Title VI complaint, as follows.

IBR Program Responsibilities and Obligations

1. External complaints alleging violations of Title VI involve a program or activity administered by the IBR program through contractors or other sub-recipients of USDOT financial assistance. These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964.
2. Intimidation or retaliation is prohibited by Title 49, Code of Federal Regulations, Part 21.11 (e). The procedures do not deny the right of a complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination.
3. It is the responsibility of the IBR program's Civil Rights and Equity office to refer a complaint to the appropriate receiving agency. Agency jurisdiction is determined by the place of employment of the respondent; or, if the identity of the respondent is unknown, the geographic location in which the alleged discrimination occurred.
4. The IBR program must also ensure that persons with Limited English Proficiency (LEP) have meaningful access to the complaint process.
 - a. Complaints in languages other than English will be translated and responded to in the language in which they were sent.
 - b. Throughout the complaint resolution process, the Investigator must ensure LEP Complainant understands their rights and responsibilities, as well as the status of their complaint.

Procedures for External Complaint Processing under Title VI

Applicability

1. Any person, or class of persons, believing they have been subjected to discrimination prohibited by Title VI in any program or activity administered by the Interstate Bridge Replacement program may file a complaint with the IBR program's Civil Rights and Equity office by contacting TitleVI@interstatebridge.org.
2. These procedures also cover complaints of discrimination in any program or activity administered by IBR that relates to local agencies, contractors and other sub-recipients receiving U.S. Department of Transportation (USDOT) funding through the Federal Highway Administration (FHWA) or the Federal Transit Administration (FTA).
3. Pursuant to FHWA guidance, all Title VI complaints under FHWA jurisdiction, including complaints filed against sub-recipients, must be forwarded to the State's FHWA Division Office, which will then

route it to FHWA Headquarters Office of Civil Rights (OCR), **before** the receiving agency takes any action on the complaint.²⁵

4. A person may file a third-party complaint on behalf of another named individual(s).

1 Informal Complaint Resolution (Not applicable to Title VI Complaints under FHWA jurisdiction)

1. When appropriate, the receiving agency will make every effort to resolve complaints promptly and at the lowest level possible, such as utilizing mediation or another alternative dispute resolution program if available to the agency.
2. Informal mediation may be used to resolve complaints at any stage of the process.
3. If a complaint cannot be resolved informally, the receiving agency may conduct an investigation of the complaint.

2 Special Instructions for routing Title VI Complaints under FHWA jurisdiction.

1. FHWA is responsible for all decisions regarding whether a complaint under FHWA jurisdiction will be accepted, dismissed, or referred to another agency.
2. The IBR program's Civil Rights and Equity office and respective receiving agencies must log all Title VI complaints on receipt.
3. After logging the complaint, the receiving agency must immediately forward all Title VI complaints under FHWA jurisdiction to their respective FHWA State Division Office, who will then forward the complaint to OCR, who will determine whether the complaint will be accepted, dismissed, or referred to another agency.
4. Once the OCR has decided whether to accept, dismiss, or transfer the complaint, OCR will notify the Complainant, the FHWA Division Office, the receiving agency, and the sub-recipient (where applicable).

Procedures for IBR Program Partners in Receipt of Title VI Complaints

1. It is the responsibility of IBR Program Partners in receipt of Title VI complaints pertaining to the IBR Program to notify the IBR Program's Civil Rights and Equity Office.
2. The IBR Program Partner will notify the IBR Program's Civil Rights and Equity Office of the outcome of the complaint, including whether a violation was found and what actions were taken as a result of the complaint.
3. The IBR Program's Civil Rights and Equity Office will maintain records of these complaints during the duration of the IBR program, pursuant to subsequent Record Retention policy contained herein.

²⁵ [Questions and Answers for Complaints Alleging Violations of Title VI of the Civil Rights Act of 1964, USDOT FHWA, 2019.](#)

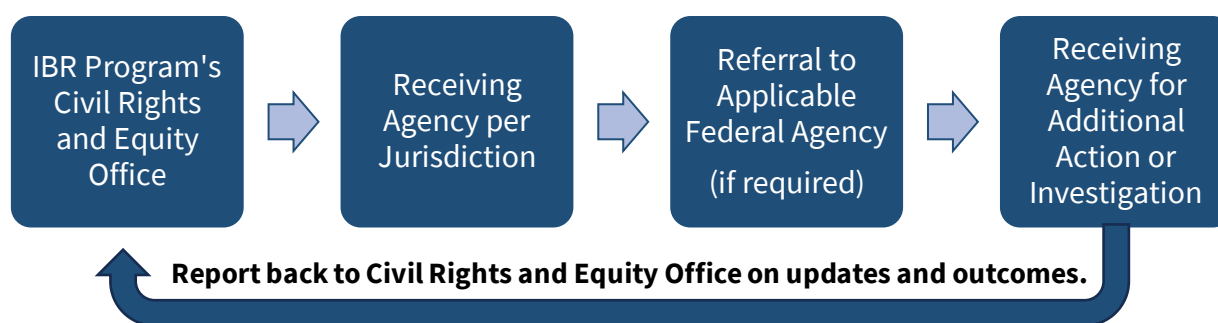
Investigations

Intake

1. The IBR program's Civil Rights and Equity Office must respond to the Complainant who sent the communication within 72 hours of receipt. The communication sent to the Complainant will include acknowledgement of receipt and identification by the receiving agency for the complaint's further adjudication.
2. The IBR program's Civil Rights and Equity Office will log the complaint, confirm the proper receiving agency with the JATF, then send the complaint to that agency.
3. Correspondence not initially considered to be a complaint, but potentially involves allegations of discrimination, will likewise be acknowledged and referred to the receiving agency for additional processing.

Investigative Process and Accountability

1. The investigative process will be conducted according to the receiving agency's established procedures.
2. Receiving agency managers or the investigator will inform the IBR program's Civil Rights and Equity office of case milestones (sent to FHWA/FTA, assigned to an investigator, on-site visit scheduled, etc.) and may ask the office to add comments to the comments section of the complaint log at any time.



Record Retention

If the FHWA, FTA, or respective receiving agency managers determine that the complaint will not be investigated, the managers will notify in writing the IBR program's Civil Rights and Equity Office responsible for logging the complaint.

1. Closed Investigative Case Files must be retained **for no less than three (3) years from the date of closure**, although respective receiving agency requirements may be greater, after which they will be destroyed in accordance with the receiving agency's customary document retention policy.

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2. All documents relevant to the case, including the initial complaint documents, documents compiled during the investigation, and any final determination, will be forwarded to the IBR program's Civil Rights and Equity Office for archiving. IBR will retain these records for the duration of the program.

TRAINING

The IBR Civil Rights and Equity Office will provide staff training focused on language accessibility as part of its Title VI training series which launched in 2024. IBR will require that all employees receive annual training on language access as a civil right and the resources available to staff to ensure implementation of this LAP. Training sessions may be either in-person or through online platforms, and program task leads will ensure their staff participate in these opportunities.

Training sessions will cover:

- Defining LEP.
- Federal protections for Individuals with LEP.
- Defining vital documents.
- IBR program policies and procedures for translation and interpretation.

MONITORING AND EVALUATION

Monitoring and evaluating accessibility and quality of the language assistance needs of persons with LEP ensures that persons with LEP can meaningfully access programs and activities. The IBR Civil Rights and Equity Office is the primary responsible body for ensuring the program honors the letter and the spirit of the LAP. The Office will update the Four Factor Analysis on an annual basis to determine whether:

1. The LEP composition of the program area and/or region have changed;
2. Existing assistance is meeting the needs of the LEP population; and
3. Resources and partnerships for assistance are still current and viable.

DEFINITIONS

Equity Priority Communities: Those who experience and/or have experienced discrimination and exclusion based on identity by infrastructure programs/projects, such as, but not limited to: BIPOC (Black, Indigenous, and People of Color)

- People with disabilities
- Communities with limited English proficiency (LEP)
- Persons with lower income
- Individuals and families experiencing houselessness
- Immigrants and refugees
- Young people
- Older adults

Interpretation: The process of fully understanding, analyzing, and processing an oral or signed message and then adapting oral or signed speech from one language to another, either simultaneously or delayed (consecutive), without loss or change in meaning.

Person with Limited English Proficiency: An individual who speaks a language other than English as their primary language and who has a limited or no ability to read, speak, write, or understand English.

Safe Harbor: Provision stipulating that if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.²⁶

Sight Interpretation: The act of transforming a written message into a spoken language. It involves reading a text silently in the source language and then speaking or signing it in the target language.

Sign Language Interpretation: The process of fully understanding, analyzing, and processing a spoken or signed message and then faithfully rendering it into another spoken or signed language. Interpreters must be able to accurately convey the meaning from one language into another in a culturally appropriate manner, mindful of the setting in which they are rendering their services.

Translation: The process of converting text from a source language into a target language. More than replacing one word with another, the translation must also convey the style, tone, and intent of the text, while taking into account differences of culture and dialect. The finished document should read as if it had originally been written in the target language for the target audience.

²⁶ [FTA Circular 4702.1B: Title 6 Requirements and Guidelines for Federal Transit Administration Recipients](#)

Vital Documents: Paper or electronic written material that contains information that is critical for a member of the public:

- For decision-making, access to services, or compliance with laws and regulations, or
- To understand the nature and importance of the program, information, encounter, or service,
- If there is a consequence to the person with LEP if the information in question is not accurate or timely.

Generally, these documents impact access to, retention in, termination or exclusion from a publicly funded program, services or benefits, safety, rights, and responsibilities.

REFERENCES

IBR program staff are advised to rely on the following resources in addition to the information and guidance included in this LAP.

US Department of Justice Limited English Proficiency

<https://www.lep.gov>

US Department of Transportation Guidance

<https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

US DOT: [Language Access Plan \(2023\)](#)

Federal Highway Administration

[Title VI Toolkit: U.S. Census – Limited English Proficiency Data Collection Walkthrough | FHWA](#)

Federal Transit Administration

[Title VI Guidance | FTA](#) (transit.dot.gov)

[Federal Register Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient \(LEP\) Persons](#)

Interpretation Guidance:

American Translators Association (ATA): [Translator vs. Interpreter: What's the Difference](#)

ASTM International: [ASTM-F2089-15.pdf](#)

State and Local Agency Title VI Program Documents (as of January 2025)

Washington State Department of Transportation: [Limited English Proficiency Accessibility Plan](#)

Oregon Department of Transportation: [Title VI Program](#)

TriMet: [Title VI Program](#)

C-TRAN: [Title VI Program](#)

Vancouver Public Schools: Draft Language Access Plan

Exhibit A – Complete American Community Survey Complete Table

**Table 1: “Languages Spoken at Home by Ability to Speak English”²⁷ for the Population 5 Years and Over”
in the IBR Program Area and Portland-Vancouver-Hillsboro Metro Area**

Source: 2023 American Community Survey 1-Year Estimate, table B16001

	# within Metro Area	LEP % of Total Population within Metro Area
Total	2,387,602	
Speak only English	1,959,739	
Spanish speakers (all)	217,245	3.40%
Spanish speakers (LEP)	81,089	
French (incl. Cajun) (all)	5,819	0.01%
French (incl Cajun) (LEP)	137	
Haitian (all)	95	<0.01%
Haitian (LEP)	54	
Italian (all)	1,888	0.03%
Italian (LEP)	658	
Portuguese (all)	3,040	0.02%
Portuguese (LEP)	582	
German (all)	8,462	0.06%
German (LEP)	1,435	
Yiddish, Pennsylvania Dutch or other West Germanic languages (all)	1,869	
Yiddish, Pennsylvania Dutch or other West Germanic languages (LEP)	0	
Greek (all)	685	<0.01%
Greek (LEP)	43	
Russian (all)	18,987	0.32%
Russian (LEP)	7,525	

²⁷ Limited English Proficiency (LEP) defined as persons who speak English less than “Very Well.”

	# within Metro Area	LEP % of Total Population within Metro Area
Polish (all)	1,174	0.01%
Polish (LEP)	257	
Serbo-Croatian (all)	2,124	0.04%
Serbo-Croatian (LEP)	953	
Ukrainian or other Slavic languages	8,171	0.20%
Ukrainian or other Slavic languages	4,846	
Armenian (all)	1,148	0.01%
Armenian (LEP)	180	
Persian (incl. Farsi, Dari) (all)	3,788	0.05%
Persian (incl. Farsi, Dari) (LEP)	1,303	
Gujarati (all)	290	
Gujarati (LEP)	0	
Hindi (all)	6,008	0.02%
Hindi (LEP)	377	
Urdu (all)	1,404	<0.01%
Urdu (LEP)	69	
Punjabi (all)	1,138	0.02%
Punjabi (LEP)	515	
Bengali (all)	2,444	0.02%
Bengali (LEP)	375	
Nepali, Marathi, or other Indic languages (all)	3,977	0.04%
Nepali, Marathi, or other Indic languages (LEP)	976	
Other Indo-European languages (all)	6,159	0.05%
Other Indo-European languages (LEP)	1,298	
Telugu (all)	2,617	0.02%
Telugu (LEP)	401	
Tamil (all)	2,491	0.01%
Tamil (LEP)	200	

	# within Metro Area	LEP % of Total Population within Metro Area
Malayalam, Kannada, or other Dravidian Languages (all)	1,411	<0.01%
Malayalam, Kannada, or other Dravidian Languages (LEP)	61	
Chinese (incl. Mandarin, Cantonese) (all)	31,679	0.63%
Chinese (incl. Mandarin, Cantonese) (LEP)	15,142	
Japanese (all)	8,236	0.11%
Japanese (LEP)	2,683	
Korean (all)	8,426	0.18%
Korean (LEP)	4,240	
Hmong (all)	3,055	0.04%
Hmong (LEP)	998	
Vietnamese speakers (all)	23,785	0.56%
Vietnamese speakers (LEP)	13,439	
Khmer (all)	3,156	0.05%
Khmer (LEP)	1,192	
Thai, Lao, or other Tai-Kadai languages (all)	5,576	0.10%
Thai, Lao, or other Tai-Kadai languages (LEP)	2,279	
Other languages of Asia (all)	4,458	0.08%
Other languages of Asia (LEP)	1,869	
Tagalog (incl. Filipino) (all)	9,508	0.08%
Tagalog (incl. Filipino) (LEP)	1,933	
Ilocano, Samoan, Hawaiian or other Austronesian Languages (all)	7,220	0.08%
Ilocano, Samoan, Hawaiian or other Austronesian Languages (LEP)	1,899	
Arabic speakers (all)	7,249	0.12%
Arabic speakers (LEP)	2,919	
Hebrew (all)	1,153	0.01%
Hebrew (LEP)	156	
Amharic, Somali, or other Afro-Asiatic Languages (all)	7,284	0.09%
Amharic, Somali, or other Afro-Asiatic Languages (LEP)	2,206	

	# within Metro Area	LEP % of Total Population within Metro Area
Yoruba, Twi, Igbo, or other languages of West Africa (all)	360	<0.01%
Yoruba, Twi, Igbo, or other languages of West Africa (LEP)	46	
Swahili or other languages of Central, Eastern, or Southern Africa (all)	2,188	0.01%
Swahili or other languages of Central, Eastern, or Southern Africa (LEP)	194	
Navajo (all)	355	
Navajo (LEP)	0	
Other Native languages of North America (all)	409	
Other Native languages of North America (LEP)	0	
Other and unspecified language speakers (all)	1,281	<0.01%
Other and unspecified language speakers (LEP)	51	