



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

Plan for Language Services to Limited English Proficient Populations

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Bay Area Air Quality Management District
375 Beale Street, Suite 600 San Francisco, CA 94105
Main Phone Number: (415) 749-5000
baaqmd.gov

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List of Acronyms and Abbreviations

ACS	American Community Survey
Air District	Bay Area Air Quality Management District
AIM	Assessment, Inventory, and Modeling
CAAQS	California Ambient Air Quality Standards
GIS	Geographic Information Systems
LEP	Limited English Proficient
LOTE	Language Other than English
NAAQS	National Ambient Air Quality Standards
Report	Plan for Language Services to LEP Populations
TIO	Technology Implementation Office
US Census	United States Census Bureau
US EPA	United States Environmental Protection Agency

Executive Summary

The Bay Area Air Quality Management District (Air District) is the primary agency responsible for assuring that the National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively) are attained and maintained in the San Francisco-Bay Area. The Air District also supports the goals of the United States Environmental Protection Agency (US EPA) Limited English Proficiency Guidance.

The US EPA requires agencies take reasonable steps to provide meaningful access to its services and programs to persons with limited English proficiency. Individuals for whom English is not their primary language and who have a limited ability to read, write, speak or understand English are limited English proficient, or “LEP.” The Air District’s Plan for Language Services to LEP Populations (Report) was developed with the goal of ensuring the Air District’s language assistance measures reflect the needs of our LEP community members across the nine-county San Francisco Bay Area and that our community members are able to meaningfully access important Air District services and programs.

US EPA LEP guidance requires a Four-Factor Analysis, or LEP needs assessment, to determine what reasonable steps should be taken to ensure meaningful access to LEP persons. This four-factor analysis considers the following:

Four-Factor Analysis	
Factor 1	The number or proportions of LEP persons served or encountered in the eligible service population
Factor 2	The frequency with which LEP individuals come in contact with the Air District’s programs or services
Factor 3	The nature and importance of the program, activity or service provided by the Air District to LEP individuals
Factor 4	The resources available to the Air District and the overall cost to provide language assistance

Following US EPA guidelines, the Air District reviewed United States Census Data (US Census Data) and conducted surveys and interviews with staff to develop the Four-Factor Analysis. The key findings from the Four-Factor Analysis shaped the development of this report.

To determine the number or proportion of LEP persons eligible to be served or likely to be encountered in the eligible service population, the Air District analyzed US

Census American Community Survey (ACS) data to identify the Bay Area's LEP population. Based on US Census ACS data from 2017-2021, the Factor 1 Analysis identified 1,173,308 individuals over the age of five who speak English less than "very well." This accounts for 16% percent of the Bay Area population. The Air District identified twelve languages or language categories that are spoken by more than 1,000 estimated LEP persons. Across the Bay Area, the five most frequently spoken languages other than English within LEP communities are Spanish, Chinese (Mandarin and Cantonese are aggregated together in US Census Data), Vietnamese, Tagalog, and Korean. It should be noted that 'Other Indo-European,' 'Other Asian and Pacific Island,' and 'Other Unspecified Languages' language categories also account for a large percentage of LEP persons in the Bay Area.

To determine the frequency with which LEP persons come in contact with Air District programs or services, and to determine the nature and importance of these programs and services to LEP persons' lives, the Air District conducted surveys with staff, as well as individual interviews and focus groups. In addition, the Air District reviewed website and language line data. To determine the resources available to the Air District and the overall cost to provide language assistance, the Air District assessed existing and available resources.

In previous years, the Air District has prioritized translating materials into four languages: Spanish, Chinese, Vietnamese, and Tagalog. According to the Four-Factor Analysis included in this report, the Air District recognizes that documents identified as Tier 1 Vital Documents (see Vital Documents Guidelines section) should be translated into Spanish and Chinese without a request. Providing language assistance in Spanish and Chinese ensures access to critical information and services for the two largest population groups who are identified as speaking English less than "very well." The Air District will continue to prioritize translating materials into Vietnamese and Tagalog, as well and translate materials into additional languages subject to available resources and/or upon request.

In addition, the Air District offers a wide range of tools for LEP populations, including written and oral language assistance, website translation, multilingual community outreach, and in-language local media engagement. The Air District has also identified additional services that can be implemented, based on resource availability, to further provide meaningful access to LEP persons. In this report, the Air District also includes information on staff and contractor training the Air District will implement to ensure all staff and contractors are aware of resources and procedures for accommodating LEP populations.

The Air District will continue to work closely with our community partners to gather feedback on the services provided and identify opportunities for improvement.

Introduction

The California State Legislature created the Air District in 1955 as the first regional air pollution control agency in the country. The Air District is governed by a 24-member Board of Directors composed of locally elected officials from each of the nine Bay Area counties, with the number of board members from each county being proportionate to its population.

The Air District is the primary agency responsible for assuring that the National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively) are attained and maintained in the San Francisco-Bay Area. The Air District's jurisdiction includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo and Santa Clara counties, and the southern portions of Solano and Sonoma counties. The Air District's responsibilities in improving air quality in the region include: preparing plans for attaining and maintaining air quality standards; adopting and enforcing rules and regulations; issuing permits for stationary sources of air pollution; inspecting stationary sources and responding to citizen complaints; monitoring air quality and meteorological conditions; awarding grants to reduce mobile emissions; implementing public outreach campaigns; and assisting local governments in addressing climate change.

The Air District is assisted by an Advisory Council that provides input to the Board and the Executive Officer on air quality matters, and a Hearing Board. The Hearing Board is an independent, five-member body that serves to adjudicate regulatory compliancy issues that may arise between the Air District and local industries, and also hears appeals of permitting decisions made by the Executive Officer. In addition, in 2021, the Air District Board of Directors formed a Community Advisory Council composed of 17 community members from across the Bay Area. The Community Advisory Council works with the Board of Directors and Executive Officer on community related matters and exercises its own initiative in selecting areas of exploration and study.

The Bay Area is home to over 7.3 million people over the age of five (US Census Bureau, 2021) and is one of the most diverse regions in the country and almost half of Bay Area residents speak a language other than English at home. As a recipient of federal funds, the Air District follows the US EPA policy guidance concerning recipients' responsibility to provide meaningful access to services, programs, and activities to limited English proficient (LEP) persons. Individuals for whom English is not their primary language and who have limited ability to read, write, speak, or understand English are considered limited English proficient, or "LEP." For the purposes of this report, the Air District will use the term LEP and the preferred,

languages other than English or “LOTE,” interchangeably. This guidance document and report were developed to better reach and meet the needs of individuals in the Bay Area who speak languages other than English (LOTE) and that LEP persons are able to meaningfully access Air District programs and services. This report serves as an update to the Air District’s previous Language Access Plan. The Air District’s Public Participation Plan is a separate, related document that describes opportunities for the public to get involved with the Air District.

Authority and Guidance

Civil rights laws and federal language access policies set the requirements that covered entities must follow to prevent discrimination against LOTE individuals in their federally funded programs and activities. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. While Title VI does not explicitly protect against language discrimination, it does protect against national origin discrimination and given that language is closely related to national origin and restrictions on the use of language may mark discrimination against specific national origin groups, Title VI has been interpreted to protect LOTE individuals.

A Presidential Executive Order was issued to federal agencies in August 2000 interpreting and enforcing Title VI. Presidential Executive Order 13166 mandates that each federal agency prepare a plan to improve access to federally funded programs for LOTE individuals, thereby increasing language access and reducing national origin discrimination. The order set two overarching goals for each federal agency: (1) implement a system by which LOTE individuals can meaningfully access the covered entity’s services consistent with, and without unduly burdening, the fundamental mission of the agency, and (2) ensure that recipients of federal financial assistance provide meaningful access to their applicants and beneficiaries who speak languages other than English. Section 2 of Executive Order 13166 requires federal agencies to develop and implement a plan for improving access to services and participation in federally conducted programs and activities for LOTE individuals.

Environmental Protection Agency LEP Recipient Guidance

As a recipient of federal funds provided by the US EPA, the Air District is required to follow standards outlined in the US EPA’s *Recipient Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*.

The US EPA suggests recipients start with a four-factor analysis to balance language access needs while not imposing undue burdens. The US EPA recognizes that a variety of approaches for language access may be used depending on the circumstances and context of the encounter. Recipients are encouraged, but not

required, to create a language access plan. The following are recommendations from the US EPA on items to include in a language access plan:

- Identifying LEP Individuals who need language assistance (e.g., I speak cards)
- Language assistance measures
- Training staff
- Providing notice to LEP persons (e.g., signs in public entry points and reception areas; outreach documents; telephone voice mail, etc.)
- Monitoring and updating the plan

The Air District has developed this report to address the needs of LEP populations within its jurisdiction per the US EPA guidance to provide meaningful assistance to LEP persons.

Four-Factor Analysis

To prepare this report, the Air District completed the US EPA's Four-Factor Analysis to determine what reasonable steps should be taken to ensure meaningful access to Air District programs and services by LOTE persons. The Four-Factor Analysis considers the following:

Four-Factor Analysis	
Factor 1	The number or proportions of LEP persons served or encountered in the eligible service population
Factor 2	The frequency with which LEP individuals come in contact with the Air District's programs or services
Factor 3	The nature and importance of the program, activity or service provided by the Air District to LEP individuals
Factor 4	The resources available to the Air District and the overall cost to provide language assistance

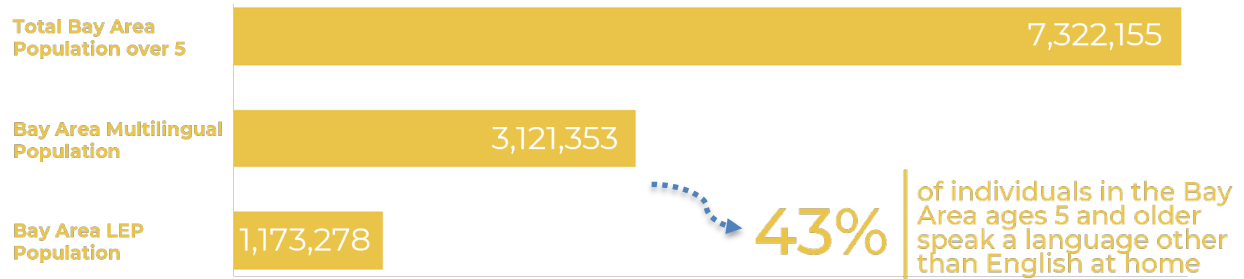
Factor 1 Analysis: The number or proportions of LEP persons eligible to be served or likely to be encountered in the eligible service population

For the Factor 1 Analysis, the Air District analyzed the US Census American Community Survey (ACS) data from 2017-2021 to identify the Bay Area's LOTE population. The ACS is a continuous nationwide survey conducted monthly by the US Census Bureau. It is intended to measure changing socioeconomic characteristics and conditions of the population on a recurring basis.

The Bay Area is home to over 7.3 million people over the age of five (US Census Bureau, 2021) is a linguistically diverse region. The primary goal of the demographic analysis is to support targeted provision of language services by identifying:

- the languages other than English most commonly spoken in the Bay Area by individuals ages 5 and older who speak English less than "very well" and would be considered limited English proficient,
- the density of LOTE populations who speak the most widely used languages across the Air District's geographic areas.

Figure 1: Bay Area, Multilingual, and LEP Populations



Nearly half, or 3,120,500 persons (42.5%) in the Bay Area speaks a language other than English at home. Of those, 37.6%, or 1,173,308 individuals, speak English less than “very well” and are limited English proficient. The LEP population represents 16% of the total Bay Area population.

Regionally, of the 1,173,278 individuals who are limited English proficient:

- 463,480 speak Spanish and represent 6.33% of the total Bay Area population.
 - 297,553 speak Chinese (Cantonese & Mandarin) and represent 4.06% of the total Bay Area population.
 - 103,317 speak Vietnamese and represent 1.41% of the total Bay Area population
 - 79,990 speak Tagalog and represent 1.09% of the total Bay Area population
 - 27,806 speak Korean and represent 0.38% of the total Bay Area population
 - 81,386 speak ‘Other Indo-European’ languages and represent 1.11% of the total Bay Area population (more information in Appendix A)
 - 61,642 speak ‘Other Asian and Pacific Island’ languages and represent 0.84% of the total Bay Area population (more information in Appendix A)
- 16% of individuals in the Bay Area ages 5 and older are limited English proficient

The Air District, with assistance from its partner agencies, developed maps using Geographic Information Systems (GIS) and ACS 2017-2021 data, to show concentrations of LEP persons who speak the seven most frequently spoken languages, or language categories, among LEP persons in the Bay Area (Figure 2). In the map, a single dot represents 200 LEP individuals who speak a given language and illustrates the geographic distribution of the LEP population in the Bay Area.

Figure 2: Top 7 Languages or Language Categories Spoken at Home for Populations with Limited English Proficiency

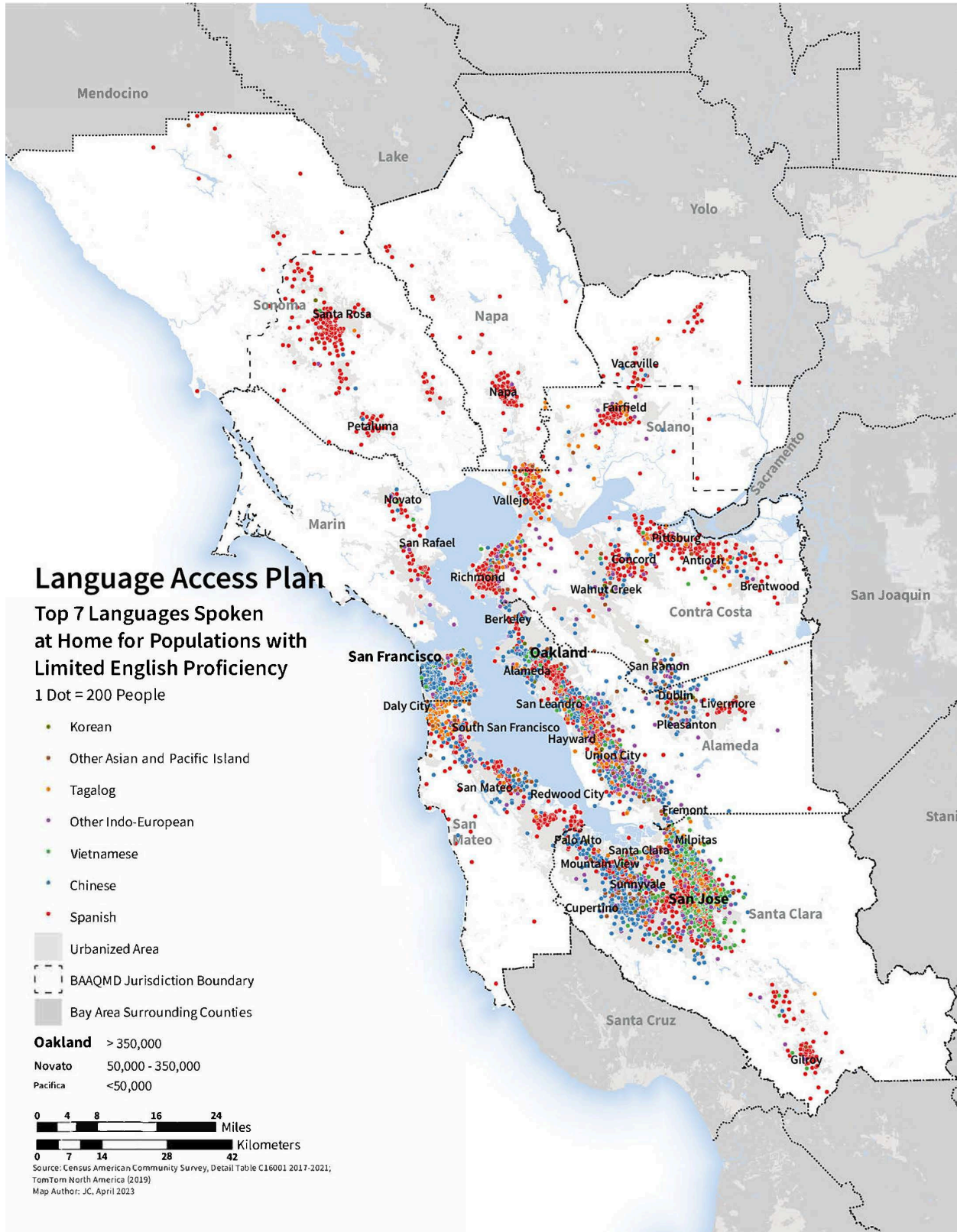


Table 1 below summarizes the number and share of LEP individuals who speak the top 5 languages by county.

*Table 1: Languages Spoken at Home by Ability to Speak English, Persons Age 5 Years and Over, 2017-2021, Speaks English Less than “Very Well”**

County	Spanish	Chinese	Vietnamese	Tagalog	Korean	Other Languages	Total Speaks English Less than “Very Well”	Total Population
Alameda	88,443	76,836	15,335	16,760	6,569	54,557	258,500	1,579,078
	5.6%	4.87%	0.97%	1.06%	0.42%	3.45%	16.37%	100%
Contra Costa	78,059	18,245	4,719	9,166	3,565	28,162	141,916	1,097,310
	7.11%	1.66%	0.43%	0.84%	0.32%	2.57%	12.93%	100%
Marin	13,363	1,427	660	316	441	4,662	20,869	250,639
	5.33%	0.57%	0.26%	0.13%	0.18%	1.85%	8.32%	100%
Napa	16,451	275	98	1,267	102	1,432	19,625	132,133
	12.45%	0.21%	0.07%	0.96%	0.08%	1.08%	14.85%	100%
San Francisco	31,999	88,417	6,482	7,843	2,937	18,087	155,765	827,714
	3.87%	10.68%	0.78%	0.95%	0.35%	2.19%	18.82%	100%
San Mateo	49,637	28,369	1,258	16,192	1,888	20,869	118,213	720,777
	6.89%	3.94%	0.17%	2.25%	0.26%	2.90%	16.40%	100%
Santa Clara	116,746	79,418	72,970	17,998	11,063	62,422	360,617	1,821,032
	6.41%	4.36%	4.01%	0.99%	0.61%	3.43%	19.80%	100%
Solano	27,010	2,923	940	9,418	569	6,276	47,136	424,663
	6.36%	0.69%	0.22%	2.22%	0.13%	1.48%	11.10%	100%
Sonoma	41,772	1,643	855	1,040	672	4,685	50,667	468,809
	8.91%	0.35%	0.18%	0.22%	0.14%	1.00%	10.81%	100%
Bay Area	463,480	297,553	103,317	79,990	27,806	201,132	1,173,278	7,322,155
	6.33%	4.06%	1.41%	1.09%	0.38%	2.75%	16.02%	100%

Source: American County Survey 2017-2021 5-Year Estimates, Table C16001

* The Air District used ACS data for LEP persons that speak English less than “very well” for the Factor 1 Analysis, as per the definition of LEP provided in FTA Circular 4702.1B

Safe Harbor Guides for Translation

The US EPA recognizes that translating all written materials into all languages served by a recipient is unrealistic. The US EPA has established safe harbor guides for recipients to utilize. When a recipient provides translation under the following circumstances, it will be considered strong evidence of compliance with the recipient's translation obligations:

1. The US EPA recipient provides written translations of vital documents (see Vital Documents Guidelines section) for each eligible LEP language group that constitutes five percent or includes 1,000 members, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally; or
2. If there are fewer than 50 persons in a language group that reaches the five percent trigger in (a), the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Recommended Priority Languages for the Region

Based on the analysis conducted, the Air District will continue to prioritize translating materials into Spanish and Chinese (Cantonese and Mandarin). In addition, where possible, the Air District will translate into Vietnamese, and Tagalog because these languages are among the most spoken non-English languages in the Bay Area and most spoken among LEP persons in the Bay Area. The Air District will also evaluate where programs or projects will take place or who would be most impacted to provide additional interpretation or translation services, as necessary. The Air District has also developed Vital Documents Guidelines to advise staff on protocol for document translation.

Factor 2 Analysis: The frequency with which LEP individuals come in contact with the Air District's programs or services

For Factor 2, the Air District completed an organizational scan and analyzed several data sources to assess how frequently LEP individuals come in contact with the Air District's programs, activities and services. The Air District conducted surveys with division staff, interviews, and a focus group to assess each division's interactions with LOTE community members, identify language access practices and approach, evaluate high priority programs and services, and identify the needs of division staff.

Data Analysis and Findings

The level of contact with the general public varies between divisions

Air District divisions fall into three categories (see Table 2), based on level of contact with the general public.

Table 2: Air District Divisions' Level of Contact with the General Public

Level of Contact	Division
Limited to No Contact	<ul style="list-style-type: none"> • Assessment, Inventory, and Modeling • Finance Office • Legal Services • Legislative Office
Minimal Contact	<ul style="list-style-type: none"> • Administrative Resources • Diversity, Equity, and Inclusion • Executive • Human Resources • Information Services • Strategic Incentives
Major Contact	<ul style="list-style-type: none"> • Communications • Community Engagement • Compliance and Enforcement • Engineering (Permitting) • Meteorology and Measurement • My Air Online (Web Team) • Planning and Climate Protection • Rules and Strategic Policy • Technology Implementation Office

Interactions with LOTE individuals vary by division

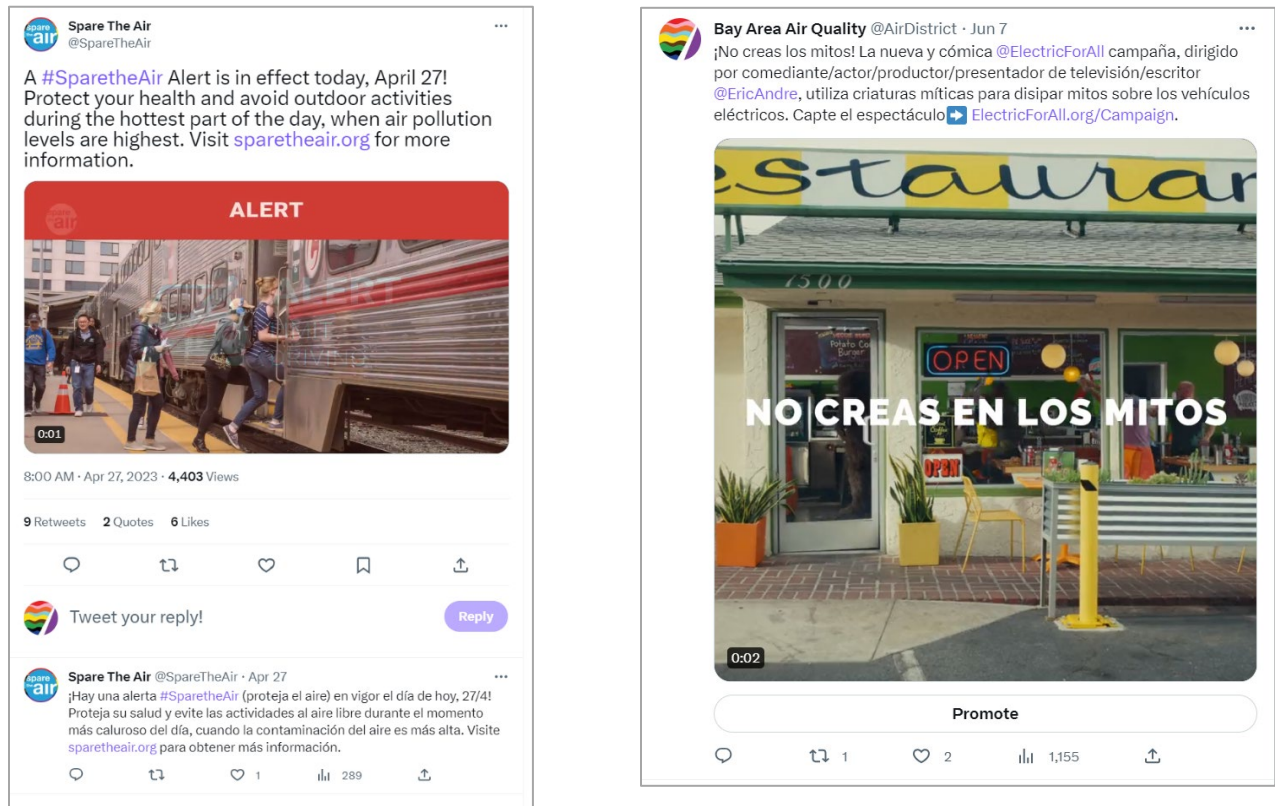
For those divisions that have contact with the general public, frequency of encounters with LOTE individuals ranges from none/infrequent (on average less than once per year) to at least once per month. Most divisions do not have many encounters with LOTE individuals regularly. The Communications, Community Engagement, My Air Online, Meteorology and Measurement, Compliance and Enforcement, and Technology Implementation Office divisions have the highest direct encounters, which are mainly through a mix of phone calls, social media posts, website materials, and in-person and/or virtual events. Other teams report very few or infrequent encounters with LOTE individuals.

In self-reported surveys and discussion, no Air District divisions reported more than 10 interactions per month with LOTE individuals. Those divisions that do interact with LOTE individuals cited relying on colleagues that can share information in-language with LOTE community members for support.

The Air District also encounters LOTE persons via social media and the Air District's websites, baaqmd.gov and sparetheair.org. The Air District posts information on

Spare the Air alerts in both English and Spanish and has previously posted information on other campaigns in Spanish.

Figure 3: Air District and Spare the Air In-Language Social Media Posts



The Air District tracks unique views to its website. The Air District is currently improving access to the website in different languages and anticipates numbers of unique views will increase as access improves. In addition to English, the Air District currently provides information in Chinese, Spanish, Tagalog and Vietnamese.

Table 3: Number of Unique Page Views on the Air District's Website* in 2022

Language	Unique Page Views	Percentage of Total Unique Page Views
Spanish	18,615	0.64%
Chinese	13,984	0.48%
Tagalog	107,971	3.70%
Vietnamese	26,200	0.90%

*baaqmd.gov

The Air District also maintains a tele-Interpreter service for all Air District staff to utilize should they need interpretation assistance. In 2022, the Air District utilized this service 39 times in three languages.

Table 4: Number of Tele-Interpretation Calls in 2022

Language	Number of Calls
Spanish	34
Mandarin	3
Vietnamese	2

Air District staff encounter Korean, Arabic, Farsi, Punjabi, Lao, Samoan, and Khmer in addition to top 4 languages

Air District staff also identified Korean, Arabic, Farsi, Punjabi, and Khmer as languages staff have encountered within their work. More information and county-specific language data is provided in Appendix B.

Summary

Based on the Factor 2 analysis, the Air District determined that Spanish-and Chinese-speaking LEP individuals are in most frequent contact with the Air District’s programs and activities; however, the combined data and feedback from staff indicate that encounters and engagement vary across the Air District.

Factor 3: The nature and importance of the program, activity or service provided by the Air District to LEP individuals

As a regulatory agency, the Air District plays a vital role in reducing air pollution in the Bay Area. Access to the Air District’s communications, including air quality alerts, permitting, compliance and enforcement, and rule development programs allow residents critical access to programs that impact their livelihoods, health and communities. In addition, access to Board of Directors meetings, planning processes and community engagement efforts allows residents to be aware and engaged with ongoing and upcoming Air District work in the community. The Air District, in reviewing its programs and in speaking with staff on their work, recognizes the importance and impact of the following programs:

- **Communications** – Air District communications includes all agency media outreach, Air District messaging, crisis communications, media relations and print, digital and social media outreach for the Air District. The Air District also shares information on the Air District’s Spare the Air, Employer Program, Clean Cars for All and Commuter Benefits Program. The Air District attends numerous community events sharing information on the Spare the Air

campaign and other air quality related topics. The Air District will also issue air quality advisories sharing information about episodic events impacting air quality in the Bay Area.

- **Environmental Justice and Community Engagement Division** – The Environmental Justice (EJ) and Community Engagement (CE) program is committed to providing meaningful engagement, reducing disparities in air quality impacts, and improving air quality for all Bay Area communities. Those who staff this program are the Air District’s main point of contact with the public. CE Division staff connect with community members to increase awareness, develop and maintain lasting partnerships to understand community needs and desired solutions, and work alongside communities to guide planning and develop equitable air quality policy.
- **Compliance and Enforcement** – The Air District has over 70 field-based inspection staff that conduct inspections of air pollution sources, verify compliance, investigate breakdowns, document violations, and respond to resident complaints about air pollution and accidental releases of air contaminants. Inspectors are assigned geographic areas throughout the Bay Area. Inspectors are responsible for all permitted sources and inspection activity within that geographic zone. In addition, the Air District has several specialized inspection groups that handle refineries, auto body shops, dry cleaners, gas stations, and asbestos demolition and renovation activities, Routine inspections combined with targeted audits of sources of air pollution help ensure emission reductions written into existing regulations are achieved.
- **Engineering/Permitting** – The Air District is responsible for the evaluation and processing of air quality permits for stationary equipment in the Bay Area. An air quality permit is a document that gives the permit holder authorization to build and operate equipment that emits pollutants through its processes. Each project is evaluated before a business can build and operate their equipment to ensure that all air quality requirements are met. The Air District updates the air emission inventories and renews the permits for the stationary equipment annually. For Permits that require a public notice and comment period, the Air District currently provides translated documents in Spanish, Chinese, Tagalog, and Vietnamese in Overburdened Communities as defined by Air District regulations. In the instance that a public notice and comment period is triggered by the proximity of the stationary source to a Kindergarten-12th grade school, the Air District will coordinate with the school site to determine and to provide translations into any language that represents over 10 percent of the English learners at the school site.
- **Meteorology and Measurement** – The Air District conducts and oversees measurements of emissions at industrial facilities and ambient air quality throughout the Bay Area. In addition, the Air District supports community

organizations conducting their own air monitoring or data analysis to develop insights about the drivers of air pollution in the community and guide actions to reduce emissions and exposure in overburdened communities. This support includes training on air quality fundamentals and air monitoring and data analysis, developing new resources, and tailored assistance throughout the duration of a project. The Air District also forecasts air quality, particularly expected daily levels of ozone and fine particulate matter, based on data from the Air District's monitoring stations and meteorological measurements and models.

- **Rule Development** – The Air District Board of Directors has developed and adopted over 100 regulations on stationary sources of air pollution. The Air District continually strengthens and refines its rules to further protect the health of Bay Area residents.
- **Planning and Climate Change** – The Air District prepares, implements and updates local and regional air quality and climate plans. Regional air quality plans complying with federal and state requirements are required when the air basin does not attain state and national air quality standards. The Air District develops or updates regional air quality plan periodically, depending on state and federal requirements, and works on an ongoing basis with community members and local governments to co-develop local plans to improve air quality and address the climate crisis.

The Air District does provide simultaneous interpretation at some Air District meetings, including meetings of the Air District's Community Advisory Council. The Air District also works closely with contractors who provide facilitation and interpretation services. The Air District often proactively provides simultaneous interpretation at community meetings and translates materials. Staff have also provided support to community partners at meetings in language, when possible. Requests for interpretation or translation of materials at meetings where the Air District does not already provide this support proactively have been minimal.

Some of the Air District's programs, like Spare the Air and Clean Cars for All, have broader reach across the Bay Area. While community members may find these programs critical, because of their own names and branding, Air District staff have found that the public is unaware of the Air District's relationship with these programs.

Factor 4: The resources available to the Air District and the overall cost to provide language assistance

The Factor 4 analysis considers the resources available to the Air District and the costs for interpretation and translation services. These financial resources and costs

impact the Air District's ability to provide interpretation or translate documents in multiple languages.

Each year, the Air District's allocated budget for interpretation and translation costs has increased and overall costs have risen. For several years, the Air District has maintained a centralized translation contract for on-demand translation services. In 2022, the Air District spent over \$30,000 on professional translation services; these monies were used to translate documents and portions of the website. In addition, the Air District maintained several facilitation contracts and agreements with community groups to provide translation and simultaneous interpretation at community meetings or events. For example, each meeting of the Air District's Community Advisory Council, a Brown Act committee created by the Board of Directors, the Air District provides all materials in Spanish and Chinese, as well as simultaneous interpretation in Spanish during the meeting. Cost of translating materials and simultaneous interpretation at one meeting is approximately \$5,000. The Community Advisory Council is expected to meet bimonthly, or six times a year.

In previous years, the Air District has maintained a list of bilingual staff and their willingness to provide support with both interpretation and translation work. Staff have shared that the complexity of interpreting and translating air quality information can be daunting and difficult to do when also accounting for regional language and/or cultural differences. In the future, the Air District may explore utilizing staff more once the Air District's glossary of scientific terms is completed, and the Air District has explored a certification method to ensure staff are adequately trained and supported in providing these services.

More information on the cost of language translation and interpretation is included in Appendix D.

Four-Factor Analysis Conclusion

The Air District determined that translation of Vital Documents and access to services should be provided in Spanish and Chinese. In addition, the Air District will prioritize providing translations in Tagalog, Vietnamese and Korean. The Air District will also be mindful of local communities and the languages spoken in communities when planning events. Based on the Four-Factor Analysis findings, the Air District has also developed Vital Documents Guidelines to advise staff on protocol for document translation.

Language Assistance Measures

Current Language Assistance Measures

Written Language Assistance

- Translate printed materials for several programs in multiple languages
- Translate fliers for community workshops or similar meetings and/or provide information and instructions on requesting translation or interpretation services
- Provide press releases, brochures, fact sheets and other information in multiple languages, as a matter of course and as requested
- Utilize a third-party translation firm to manually translate Air District printed materials and website pages
- Coordinate with staff to avoid overly technical language, as possible

Oral Language Assistance

- Operate language line services to provide oral language assistance for various Air District programs and services
- Employ multilingual Air District staff
- Contract with language translation/interpretation firms for language assistance, as needed
- Coordinate with Air District staff to evaluate the effectiveness of translation
- Utilize bilingual staff to interpret information, as needed

Future Language Assistance Measures

- Utilize the “Vital Documents Guidelines” to prioritize translation needs and languages (see Vital Documents Guidelines section)
- Per US EPA directive, continue utilizing a third-party translation firm to manually translate Air District printed materials and website pages
- Develop community focus groups to evaluate effectiveness of interpretation/translation services and gather feedback
- Conduct outreach to inform community partners of this report and available language assistance services
- Continue to hire multilingual staff members
- Ensure existing and new staff are regularly trained on resources and tools available to assist them with interpretation/translation requests

Vital Documents Guidelines

In accordance with the US EPA guidelines, the Air District determines which documents, or “vital documents” should be translated into the languages that meet the Air District’s translation threshold.

The Air District defines vital documents as follows:

- Any document that provides information critical to the community’s public health or access to programs or services provided by the Air District. Classification of a document as Vital depends upon the importance of the program, information, service, or encounter involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.
- Any document that is required by law.

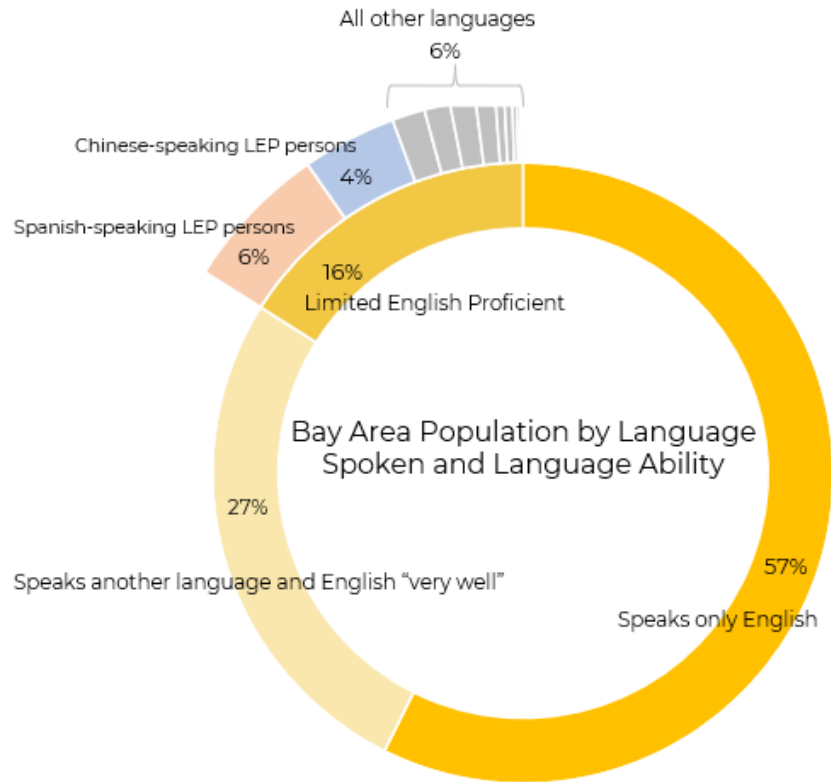
To assist Air District staff in determining which documents should be considered vital, the Air District has developed the following guidelines. The Air District evaluates the importance of the program, information, or service involved and the consequence to the LEP person if the information is not provided accurately or in a timely manner when determining the classification of a document.

Language Translation Guidance

The Air District’s Factor 1 analysis, as described in the report, identified 1,173,308 individuals over the age of five who speak English less than “very well.” This accounts for 16% percent of the population residing within the Air District’s jurisdiction. This analysis also identified 12 languages or language categories with 1,000 or more people who speak English less than “very well” and would be considered LEP persons. In the Bay Area, nearly 40% of the LEP population, or 6% of the Bay Area population, identified as Spanish-speaking persons and account for the largest share of the LEP population, followed by Chinese-speaking persons accounting for 25% of the LEP population, or 4% of the Bay Area population. Of the remaining LEP persons within the Bay Area, no single language exceeds two percent of the population.

Based on the Four-Factor Analysis related to 1) the number and proportion of LEP persons in the Air District’s jurisdiction, 2) the frequency of contact with LEP persons, 3) the importance of Air District programs and services to LEP persons’ lives and 4) the resources available to the Air District, the Air District has determined that Spanish and Chinese meet the Language Translation Threshold and the Air District should continue to prioritize translation into Vietnamese and Tagalog dependent on available resources.

Figure 4: Bay Area Population by Language Spoken and Language Ability



The Air District has determined that providing language assistance in Spanish and Chinese would provide access and information to the two largest population groups identified as speaking English less than “very well.” Any documents determined as Vital Tier 1 Documents will be translated into Spanish and Chinese without a specific request for translation; the Air District will also prioritize translating Vital Tier 1 documents into Vietnamese and Tagalog dependent on available resources. Where possible, the Air District will proactively provide simultaneous interpretation services upon request.

In the Bay Area, where there are 12 languages or language categories with 1,000 or more people who speak English less than “very well” and would be considered LEP persons, the Air District recognizes that more can be done to ensure access for all Bay Area residents. Where possible, when planning events or working together with communities to address local air quality concerns, Air District staff will analyze US Census Bureau data, and partner with local organizations, ensure information is available in the languages spoken in the community and tailored to best suit the needs of communities and those most impacted by Air District programs and activities.

Vital Document Tiers

Tier 1: Critical documents

Tier 1 documents are the Air District's highest priority. The Air District will translate Tier 1 Vital Documents without request into Spanish and Chinese. Tier 1 documents include:

- Documents that, without translation, would seriously impact LEP persons access to *critical* public health information or access to programs or services provided by the Air District.
- Documents which, without translation, would deprive LEP persons of an awareness of their legal rights, particularly rights to language assistance

Examples of Tier 1 documents include Title VI information, legal, public notices and select information about the Air District's programs or services, including:

- Notification to beneficiaries of protection under Title VI
- Title VI complaint form
- Air quality complaint form
- General permitting information and/or information to access interpretation support
- New Source Review and Title V permitting documents and information

Tier 2: Documents that will enhance access to Air District services or programs

Tier 2 documents include information that enhances access to Air District programs or services for LEP individuals. The Air District will translate any documents regarded as Tier 2 Vital Documents into any language feasible upon request. The Air District may translate Tier 2 Vital Documents at its discretion and without request upon resource availability. Examples of documents considered Tier 2: Vital Documents may include:

- General Air District information, (e.g., brochures, flyers or general programmatic information)
- Meeting announcements, agenda packets and other information regarding the Air District Board of Directors and Committee meetings, Community Advisory Council, Advisory Council or Hearing Board materials
- Grant program materials for programs that specifically target the public, e.g., Clean Cars for All and Vehicle Buy Back, including instructions to apply (not intended for non-residential grant programs, e.g., those that target private businesses and public agencies)
- Collateral materials related to Air District programs (e.g., Spare the Air program materials, Clean Cars For All program materials)

Tier 3: Documents that will enhance and support participation of LEP persons in Air District programs and decision-making

Tier 3 documents include information that supports LEP persons in participating in Air District programs and decision-making processes. The Air District will translate any Tier 3 Vital Document upon request into any language feasible. The Air District will also translate some Tier 3 Vital Documents at its discretion and subject to

available resources, without request. Examples of some of these documents may include:

- Information on Air District rule-making or air quality plans
- Information regarding long-range, regional transportation planning
- General air quality programmatic information

Staff Training

The Air District works to instill awareness of and sensitivity to the needs of LEP persons. The Air District provides multilingual access to its programs through third-party contract service providers. Going forward, the Air District recommits to providing regular training to all staff on procedures for accommodating LEP persons, as detailed below:

Training Materials

The Air District is developing a customized training program that includes information and an overview of the Air District's Title VI requirements and how to:

- provide meaningful access and assistance to LEP persons
- respond to phone communications or written inquiries from LEP persons
- arrange for interpretation or translation support at Air District meetings/events
- determine if documents are vital utilizing the guidelines included in this report (see Vital Documents Guidelines section)
- request translation of materials, as needed

Staff will be asked to complete a quiz at the end of the training webinar to reaffirm knowledge of the Air District's resources and support. The Air District will continue to evaluate the effectiveness of the training materials and update, as needed. Staff will be required to complete this training on a yearly basis.

On-Boarding

As new staff are on-boarded at the Air District, training on procedures for accommodating LEP persons will be incorporated into the on-boarding process.

Notification to LEP Persons

In accordance with Title VI regulations, the public must be provided with notice of information. The Air District provides notice to LEP persons through various means, including, but not limited to:

- Notice of availability of language assistance and translation services on the Air District's website
- Documents (fliers, press releases, legal notices, and brochures) that are translated and/or provide information on the availability of interpretation and translation services
- Circulating information on Air District programs, like Spare the Air days, to media outlets to promote air quality awareness and availability of language interpretation and translation services
- Partnerships with local community organizations that serve LEP populations
- Paid advertising campaigns, like Spare the Air, shared in multiple languages
- Board meeting notice language interpretation and translation service availability
- Air District staff trained in taking in-bound calls in multiple languages, particularly on the general phone line and Air Quality Complaint Hotline
- Phone line equipped to receive messages in multiple languages

In addition, the Air District provides language interpretation and translation services upon request and free of charge to any individual. LEP persons can request language interpretation at meetings or other assistance by reaching out to the Air District via the language line, general or public information phone numbers.

Input from Community Partners and Updating the Plan into the Future

The Air District will update the 2023 Plan, as needed, to ensure meaningful access to Air District programs and services by LEP persons. In the immediate, the Air District will reach out to community partners throughout the Bay Area to gather information on the Air District's current services provided and assess these services with the feedback provided. In 2024, the Air District will provide an amendment to this report with the information gathered from community partners and a review of any adjustments to services in response to that feedback.

In continuing years, the Air District will monitor services provided to ensure meaningful access to Air District programs and services. The Air District will periodically reassess the Air District's demographic data, as available from federal and local sources, and gather feedback from staff, contractors and local community partners serving LEP individuals to evaluate effectiveness of provided services and gather recommendations for improvement.

In compliance with the US EPA's guidelines, the Air District will evaluate this report into the future by reviewing the following:

- Changes to the number and proportion of LEP persons within the Air District's jurisdiction; this will require utilizing new data provided by the U.S. Census, as available
- Changes in the frequency of contact with LEP persons; this will require surveying staff and assessing data from services provided, like Language Line usage or hits to translated web pages
- Nature and importance of Air District programs, services and activities to LEP persons; this will require also assessing new Air District programs
- Feedback directly from LEP persons and from community partners serving LEP persons on the effectiveness of services provided
- Staff knowledge of services provided, implementation of the Plan and any service improvements identified, effectiveness of current services and potential improvements
- Effectiveness of staff LEP trainings and Air District-wide language assistance guidance

Appendix A: Notes on Census Data

Data from the American Community Survey (ACS) 2017-2021 5-year estimates was analyzed to determine the languages spoken and English language abilities within the Air District jurisdiction. The ACS is a large-scale survey conducted by the U.S. Census Bureau. It provides population estimates based on data collected over a 1-year, 3-year, and 5-year periods, including demographic characteristics (such as age, race), languages spoken, place of birth, educational attainment, income and poverty, housing, employment, and other topics for states, counties, cities, and other geographic areas.

While both 1-year and 5-year estimates are available for the Bay Area, the data used for this report is from the ACS 5-year estimates which combines data collected over a 60-month period between 2017 and 2021. This data set was selected because it provides increased statistical reliability compared with that of single-year estimates and offers greater precision to identify the languages other than English (LOTE) spoken in the Bay Area, English proficiency of speakers of those languages, and their places of birth. Additionally, 5-year estimates provide block group data which is the lowest level of geography available through the ACS data. Detailed tables containing block group data were used to produce 'dot maps' showing the density of individuals with limited English proficiency who speak the top 7 languages across the Air District's service area. More information on the data is available at <https://www.census.gov/programs-surveys/acs/guidance/estimates.html>.

While the ACS 5-year estimates are often the only source of demographic, social, economic, and housing data for communities that are too small or too infrequently surveyed, making it useful to organizations for planning and research purposes, it is also important to note its limitations. Smaller populations will be grouped together, and diverse languages may not specifically be named.

The ACS collects data on speakers of languages other than English and on their English-speaking ability by asking participants if they speak a language other than English at home. Participants who self-report speaking a language other than English at home are asked to identify the language, and indicate whether they speak English "Very Well," "Well," "Not Well," or "Not at All." All but those who select "Very Well" are considered limited English proficient or LEP. This report uses the term LOTE as a proxy for LEP individuals.

Please note that language information is gathered for populations over the age of five and all data in this report is representative of the population of the Bay Area over the age of five.

Data on Languages Spoken

In 2015 the US Census introduced a new language coding system to better conform to the International Organization for Standardization's ISO-639-3 standard. Per the US Census, the full list of languages is not available; however, data products are published on four major language groups:

- **Spanish** includes Spanish, Spanish Creole, and Ladino.
- **Other Indo-European Languages** include most languages of Europe and the Indic languages of India. These include the Germanic languages such as German, Yiddish, and Dutch; the Scandinavian languages such as Swedish and Norwegian; the Romance languages such as French, Italian, and Portuguese; the Slavic languages such as Russian, Polish, and Serbo-Croatian; the Indic languages such as Hindi, Gujarati, Punjabi, and Urdu; Celtic languages; Greek; Baltic languages; and Iranian languages.
- **Asian and Pacific Island Languages** include Chinese; Korean; Japanese; Vietnamese; Hmong; Khmer; Lao; Thai; Tagalog or Filipino; the Dravidian languages of India such as Telugu, Tamil, and Malayalam; and other languages of Asia and the Pacific, including the Philippine, Polynesian, and Micronesian languages.
- **All Other Languages** include Uralic languages such as Hungarian; the Semitic languages such as Arabic and Hebrew; languages of Africa; Native North American languages, including the American Indian and Alaska Native languages; and indigenous languages of Central and South America.

The Air District has drawn the above information on the four major language groups directly from the US Census in a document titled, *Language Use in the United States: 2019* by Sandy Dietrich and Erik Hernandez, Issued in August 2022. The article and above information are available at:

<https://www.census.gov/content/dam/Census/library/publications/2022/acs/acs-50.pdf>

Appendix B: Language Density Maps

Figure B1: Spanish-speaking Limited English Proficient (LEP) Individuals Distribution Map

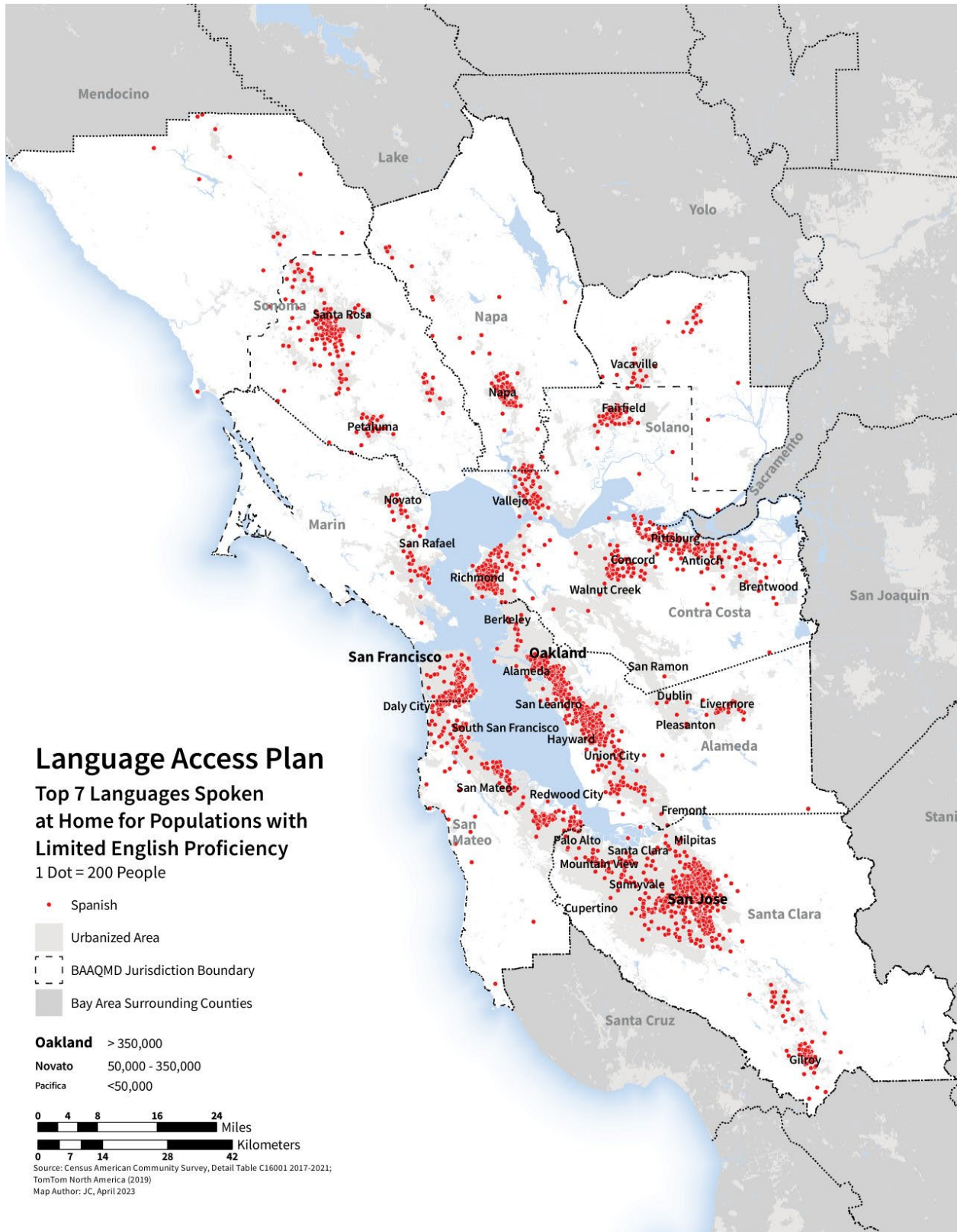


Figure B2: Chinese-speaking Limited English Proficient (LEP) Individuals Distribution Map



Figure B3: Vietnamese-speaking Limited English Proficient (LEP) Individuals Distribution Map



Figure B4: Tagalog-speaking Limited English Proficient (LEP) Individuals Distribution Map



Figure B5: Korean-speaking Limited English Proficient (LEP) Individuals Distribution Map



Figure B6: Other Indo-European Language-speaking Limited English Proficient (LEP) Individuals Distribution Map



Figure B7: Other Asian and Pacific Island Language-speaking Limited English Proficient (LEP) Individuals Distribution Map



Table B1: Language Spoken at Home for the Population 5 Years and Over

	Alameda	Contra Costa	Marin	Napa	San Francisco	San Mateo	Santa Clara	Solano	Sonoma	Bay Area Total
Total Population	1,579,078	1,097,310	250,639	132,133	827,714	720,777	1,821,032	424,663	468,809	7,322,155
Speak only English	852,922	704,953	196,930	87,267	474,554	394,247	843,636	298,791	347,502	4,200,802
Spanish										
Total Spanish	253,280	201,614	29,092	35,138	89,710	127,463	316,211	72,275	93,574	1,218,357
Speak English "very well"	164,837	123,555	15,729	18,687	57,711	77,826	199,465	45,265	51,802	754,877
Speak English less than "very well"	88,443	78,059	13,363	16,451	31,999	49,637	116,746	27,010	41,772	463,480
Chinese (including Mandarin and Cantonese)										
Total Chinese (incl. Mandarin, Cantonese)	145,606	38,504	2,872	497	148,818	63,699	178,128	4,676	2,821	585,621
Speak English "very well"	68,770	20,259	1,445	222	60,401	35,330	98,710	1,753	1,178	288,068
Speak English less than "very well"	76,836	18,245	1,427	275	88,417	28,369	79,418	2,923	1,643	297,553
Vietnamese										
Total Vietnamese	29,341	8,466	991	295	10,705	3,704	119,407	2,064	1,819	176,792
Speak English "very well"	14,006	3,747	331	197	4,223	2,446	46,437	1,124	964	73,475
Speak English less than "very well"	15,335	4,719	660	98	6,482	1,258	72,970	940	855	103,317
Other Indo-European Languages										
Total Other Indo-European languages	107,122	46,261	8,000	2,397	22,092	30,165	131,554	6,695	6,094	360,380
Speak English "very well"	82,816	32,754	5,780	1,569	18,826	23,561	105,175	4,108	4,405	278,994
Speak English less than "very well"	24,306	13,507	2,220	828	3,266	6,604	26,379	2,587	1,689	81,386

	Alameda	Contra Costa	Marin	Napa	San Francisco	San Mateo	Santa Clara	Solano	Sonoma	Bay Area Total
Tagalog (incl. Filipino)										
Total Tagalog (incl. Filipino)	56,869	31,697	1,154	3,433	21,458	45,857	49,782	27,319	3,545	241,114
Speak English "very well"	40,109	22,531	838	2,166	13,615	29,665	31,784	17,901	2,505	161,114
Speak English less than "very well"	16,760	9,166	316	1,267	7,843	16,192	17,998	9,418	1,040	80,000
Other Asian and Pacific Island languages										
Total Other Asian and Pacific Island languages	66,286	25,241	1,776	878	17,328	21,596	86,565	6,714	4,121	230,505
Speak English "very well"	49,636	18,467	1,239	579	11,130	14,483	66,519	4,131	2,679	168,863
Speak English less than "very well"	16,650	6,774	537	299	6,198	7,113	20,046	2,583	1,442	61,642
Korean										
Total Korean	14,007	7,365	907	247	7,161	4,685	25,182	1,133	1,017	61,704
Speak English "very well"	7,438	3,800	466	145	4,224	2,797	14,119	564	345	33,898
Speak English less than "very well"	6,569	3,565	441	102	2,937	1,888	11,063	569	672	27,806
Russian, Polish, or other Slavic languages										
Total Russian, Polish, or other Slavic languages	9,959	9,917	1,980	341	13,908	11,670	24,734	1,195	1,464	75,168
Speak English "very well"	7,245	6,705	1,212	208	8,672	7,632	16,783	930	1,030	50,417
Speak English less than "very well"	2,714	3,212	768	133	5,236	4,038	7,951	265	434	24,751
Other and unspecified languages										
Total Other and unspecified languages	17,275	8,557	1,185	143	4,528	3,463	18,571	810	1,441	55,973
Speak English "very well"	11,411	6,623	907	133	3,452	2,962	13,727	587	1,048	40,850
Speak English less than "very well"	5,864	1,934	278	10	1,076	501	4,844	223	393	15,123

	Alameda	Contra Costa	Marin	Napa	San Francisco	San Mateo	Santa Clara	Solano	Sonoma	Bay Area Total
Arabic										
<i>Total Arabic</i>	10,653	5,802	827	235	4,134	5,342	7,668	899	1,279	36,839
Speak English "very well"	7,367	4,168	481	162	3,045	3,781	6,236	624	972	26,836
Speak English less than "very well"	3,286	1,634	346	73	1,089	1,561	1,432	275	307	10,003
French, Haitian, or Cajun										
<i>Total French, Haitian, or Cajun</i>	9,955	5,529	2,581	677	8,866	4,664	9,454	1,192	2,046	44,964
Speak English "very well"	8,820	4,861	2,223	601	7,832	3,960	8,496	926	1,757	39,476
Speak English less than "very well"	1,135	668	358	76	1,034	704	958	266	289	5,488
German or other West Germanic languages										
<i>Total German or other West Germanic languages</i>	5,803	3,404	2,344	585	4,452	4,222	10,140	900	2,086	33,936
Speak English "very well"	5,201	2,971	2,189	572	4,264	3,874	9,328	823	1,955	31,177
Speak English less than "very well"	602	433	155	13	188	348	812	77	131	2,759

Appendix C: Air District Staff Input

Survey

A survey was conducted with each division at the Air District to assess each division's type and frequency of current interactions with LOTE individuals, and current policies, programs, services, and budget expenses around language access. A respondent was identified within each division based on familiarity with language access operations. The survey was conducted in November and December of 2022.

Respondents belong to the following divisions/offices:

1. Administrative Resources
2. Assessment, Inventory, and Modeling (AIM)
3. Communications
4. Compliance and Enforcement
5. Diversity, Equity, and Inclusion
6. Engineering (Permitting)
7. Environmental Justice and Community Engagement
8. Executive Office
9. Finance Office
10. Human Resources
11. Information Services
12. Legal Services
13. Legislative Office
14. Meteorology and Measurement
15. My Air Online (Web Team)
16. Planning and Climate Protection
17. Rules and Strategic Policy
18. Strategic Incentives
19. Technology Implementation Office (TIO)

Division/Offices Interviews

Interviews were conducted to gather information about the role divisions play in providing language access services. This included identifying current practices, the tools and strategies used to deliver language access services, and each division's needs and priorities for language access. Interview participants consisted of individuals who hold leadership positions. Participants were selected by the Air District Project Team. Five (5) interviews were conducted, with seven (7) total participants. Interviews were conducted over Zoom and took place between March and April 2023.

Interview participants belong to the following divisions:

1. Communications: 3 participants
2. Community Engagement: 1 participant

3. Engineering: 1 participant
4. My Air Online (Web Team): 1 participant
5. Executive Office/Equity: 1 participant

Frontline Staff Focus Group

A focus group was conducted to gain further insight on each division’s role in language access and interactions with LOTE community members from the perspective of frontline staff members. The focus group was composed of frontline staff who regularly interact with and directly serve the public, therefore might have more direct interactions with LOTE community members. Participants of the focus group included the following divisions:

1. Administrative Resources
2. Compliance and Enforcement (2 individuals)
3. Executive Office
4. Meteorology and Measurement
5. Planning and Climate Protection
6. Rules and Strategic Policy
7. Strategic Incentives
8. Technology Implementation Office (TIO)

Table C1: Data Collection Summary

Data Collection Methods	Timeline	Participants
Department Engagement Survey	November-December 2022	19 Respondents
Department Interviews	March-April 2023	5 Interviews, 7 Participants
Frontline Staff Focus Group	April 2023	9 Participants

Appendix D: Translation Costs

The following are samples of current simultaneous interpretation and translation costs but is not a complete reflection of how much the Air District may pay for translation or interpretation. The Air District works with several contractors to provide simultaneous interpretation and translation services and costs vary.

Table D1: Standard Rates for Translation Service

Standard Rates for Translation Service	
Language	Cost Per Word*
Spanish	\$0.18
Traditional Chinese	\$0.20
Simplified Chinese	\$0.20
Tagalog	\$0.22
Vietnamese	\$0.22
Other Languages	<i>Varies</i>
*Cost per word can be lower in instances that the Air District has translated the word or term before or is repeated through the document, etc.	

Table D2: Rates for Translation Projects

Rates for Translation Projects	
Multilingual Desktop Publishing	\$75.00 per hour
Secondary Proofing	\$65.00 per hour
Third-party Review	\$75.00 per hour
ADA-Compliant Output	\$85.00 per hour

Table D3: Additional Supporting Services Rates

Additional Supporting Services Rates <i>(For Spanish, Traditional Chinese, Simplified Chinese, Tagalog, and Vietnamese)</i>	
Project Management	5% of project total
Rush Fee	25% of project total
Urgent Rush Fee	\$75.00 + per word costs
Emergency Rush Fee	\$250 + per word costs, for up to 200 words

Table D4: Simultaneous Interpretation via Phone

Simultaneous Interpretation via Phone <i>(for phone calls into the Air District)</i>	
Language	Cost Per Minute*
Spanish	\$0.17 per minute
Mandarin	\$0.18 per minute
Vietnamese	\$0.18 per minute
<i>Other languages available upon request; in 2022 the Air District did not receive requests for interpretation in any other languages.</i>	
<i>*All costs per minute are approximate</i>	

Table D5: In-Meeting Spanish Simultaneous Interpretation

In-Meeting Spanish Simultaneous Interpretation	
In Meeting Technical Support	\$170.00 per hour
Spanish Interpreter	\$180.00 per hour
Pre and post meeting support	\$170.00 per hour