

FRIEDMAN MEMORIAL
A I R P O R T

TITLE VI

LIMITED ENGLISH PROFICIENCY PLAN



Contents

1.0	COMMUNITY STATISTICS	3
1.1	CATCHMENT AREA	4
1.2	PROTECTED CLASSES	5
1.3	BLAINE COUNTY, IDAHO DEMOGRAPHIC DATA.....	6
1.3.1	LOCAL COMMUNITY OVERVIEW	6
1.3.2	AREA ECONOMY.....	7
2.0	LIMITED ENGLISH PROFICIENCY	8
2.1	NUMBER OF LEP PERSONS IN FRIEDMAN MEMORIAL AIRPORT CATCHMENT AREA	9
2.2	FOUR-FACTOR ANALYSIS.....	9
2.2.1	NUMBER OF LEP PERSONS LIKELY TO BE ENCOUNTERED	9
2.2.2	FREQUENCY OF CONTACT WITH LEP PERSONS	10
2.2.3	NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY, OR SERVICE.....	11
2.2.4	RESOURCES AVAILABLE AND COSTS IMPOSED	11
3.0	LANGUAGE ASSISTANCE MEASURES	12

1.0 COMMUNITY STATISTICS

Friedman Memorial Airport is located in the City of Hailey in the Central Idaho Rockies, as shown in **Figure 1-1**. Situated in the Wood River Valley, the Airport sits just east of the Big Wood River and is surrounded by mountainous terrain, including the Smoky, Boulder and Pioneer mountains ranges. The Airport is on the south end of Hailey and parallels State Highway 75 and is 13 miles south of Sun Valley. The Airport sits at an elevation of 5,318 feet above sea level and encompasses 219 acres of land.¹

SUN is a publicly owned, public-use, general aviation and commercial service airport jointly owned by the City of Hailey and Blaine County and operated by the Friedman Memorial Airport Authority (FMAA). The FMAA maintains the Airport facilities and functions as the Airport Sponsor for federal and state grant funding purposes. Day-to-day operation of the Airport is handled by a dedicated, professional airport management staff. Airport staff is responsible for terminal operations, airfield operations, customer service, aircraft rescue and firefighting (ARFF), maintenance, and general administration, among others.²

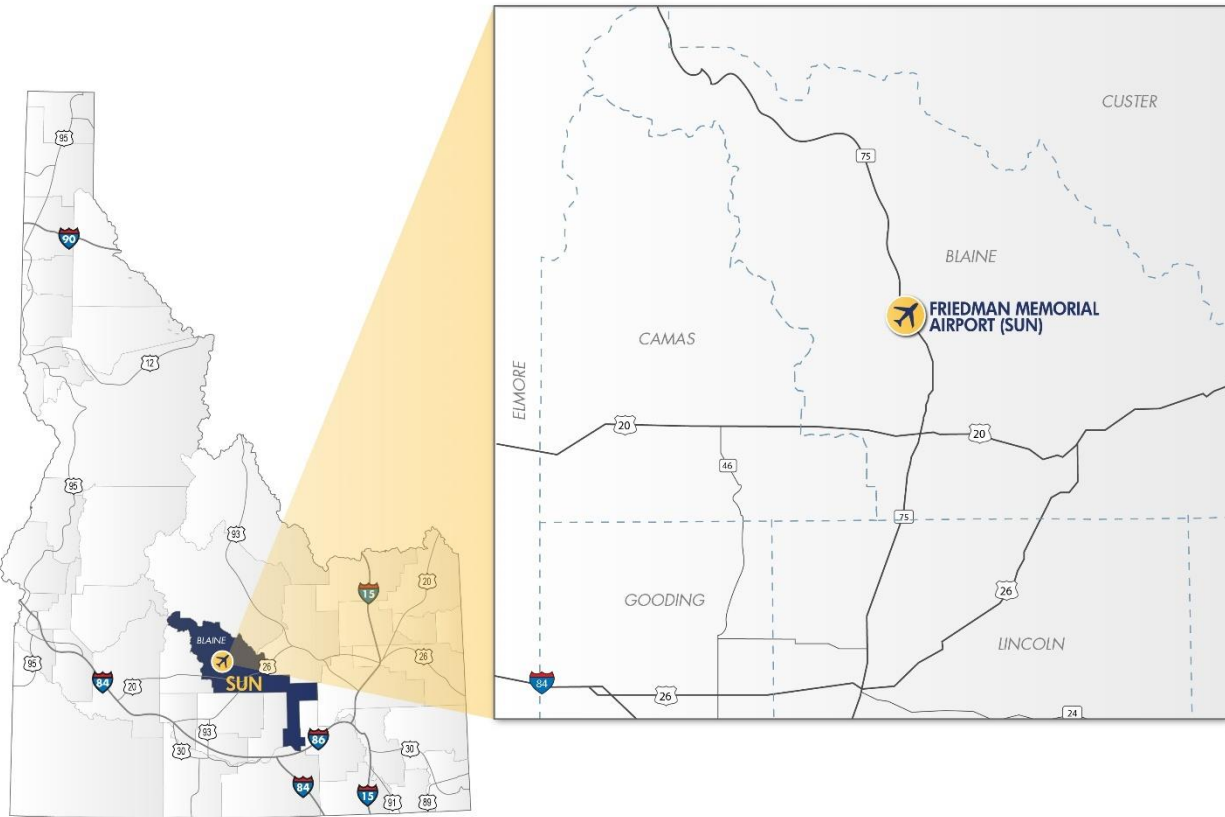
The Airport provides commercial service through Delta Airlines, Alaska Airlines and United Airlines. SUN is also considered a general aviation airfield, providing space for local aviators. The Airport is categorized as a commercial service, primary, non-hub airport by the FAA, as reflected in the National Plan of Integrated Airport Systems (NPIAS). Non-hub airports receive less than 0.05 percent of the national share of enplanements but enplane more than 10,000 passengers on an annual basis. As of 2022, the Airport served more than 100,000 passengers and had approximately 25,799 annual aircraft operations. Additionally, SUN had approximately 157 based aircraft in 2022.³

¹ Friedman Memorial Airport, iFlySUN.com, Accessed April 2024.

² Friedman Memorial Airport Master Plan Update, Mead & Hunt, 2018.

³ FAA Terminal Area Forecast (TAF), Accessed April 2024.

FIGURE 1-1: SUN PROXIMITY MAP



Source: Woolpert, Inc.

The Airport provides the region with aviation facilities designed to accommodate a full range of aviation services and operations including small general aviation aircraft and commercial passenger services. SUN also supports aerial/wildland firefighting and emergency medical evacuations, making the airport a vital resource for the surrounding community. The Airport is part of the Idaho Airport System Plan which commissioned a 2007 *Economic Impact Analysis* report, where it was estimated that SUN supports over 1,500 local jobs and generates an estimated \$120 million in economic activity.⁴ The Airport's approved budget for airport operations in Fiscal Year 2024 is approximately \$4.4 million, which includes payroll for 16 full-time equivalent staff.

1.1 CATCHMENT AREA

As discussed previously, the Airport is located in the City of Hailey, situated in the Central Idaho Rockies and is approximately 2½ hours drivetime east of Boise. The catchment area represents the area that is deemed reasonable, based on the Airport's commercial service. The catchment area for the Airport encompasses Blaine County. **Figure 1-2** illustrates the catchment area for SUN.

⁴ Friedman Memorial Airport Master Plan Update, Mead & Hunt, 2018.

FIGURE 1-2: CATCHMENT AREA



Source: Woolpert, Inc.

1.2 PROTECTED CLASSES

According to the U.S. Census Bureau, from 2017-2021, the Catchment Area had a population of approximately 23,868 persons. This study includes an evaluation of all protected classes, to include persons of minority race, color, national origin, religion, sex, age, or disability. The following tables depict the number of persons within each protected class in the Catchment Area.

TABLE 1-1: RACE/COLOR

Race/Color	Blaine County
White	84.5%
Two or more races	6.2%
Some other race	6.9%
Black or African American	0.5%
American Indian and Alaska Native	0.9%
Native Hawaiian and Other Pacific Islander	0.1%
Asian	0.9%
Hispanic or Latino	

Race/Color	Blaine County
Hispanic or Latino (of any race)	23.4%
Not Hispanic or Latino	76.6%

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

TABLE 1-2: NATIONAL ORIGIN

Birthplace	Blaine County
Citizen, US-Born	82.0%
Citizen, Born Abroad	1.2%
Citizen, Foreign Born	16.8%
U.S. Citizenship Status	
Citizen, Naturalized	37.6%
Not Citizen	62.4%

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

TABLE 1-3: SEX

Sex	Blaine County
Male	51.9%
Female	48.1%

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

TABLE 1-4: AGE

Age	Blaine County
Persons under 5 years	4.6%
Persons under 18 years	21.9%
Persons 65 years and over	19.1%

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

TABLE 1-5: DISABILITY

Disability	Blaine County
With a disability, age 18-64 years	7.1%
With a disability, under age 18 years	3.4%

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

1.3 BLAINE COUNTY, IDAHO DEMOGRAPHIC DATA

1.3.1 LOCAL COMMUNITY OVERVIEW

The City of Hailey, Idaho was founded by John Hailey in 1879 and named as the county seat to Blaine County in 1881. The City of Hailey has a strong history in mining, livestock, and recreation. Hailey’s growth was

sustained by recreational opportunities including the creation of the Sun Valley ski resort in 1936, just north of Hailey.⁵

Today, the City of Hailey has a population around 8,000 full-time residents and is situated along the Big Wood River and U.S. Highway 75. Outdoor activities are very popular including hiking, fishing, camping, biking, skiing, and off-highway recreation. Hailey sits at an elevation of 5,318 feet, and with tourism and outdoor recreation opportunities that continue to bring visitors through the community.⁶

1.3.2 AREA ECONOMY

According to the U.S. Census Bureau, from 2017-2021, the civilian employed population, 16 years and over was 12,917 for the Catchment Area. The civilian employment percentages by industry for the Catchment Area from 2017-2021 are shown in **Table 1-6**.

TABLE 1-6: INDUSTRY EMPLOYMENT

Industry	Blaine County
Agriculture, forestry, fishing and hunting, and mining	2.8%
Construction	14.2%
Manufacturing	7.1%
Wholesale trade	1.1%
Retail trade	13.3%
Transportation and warehousing, and utilities	2.5%
Information	1.3%
Finance and insurance, and real estate and rental and leasing	5.5%
Professional, scientific, and management, and administrative and waste management services	11.6%
Educational services, and health care and social assistance	11.9%
Arts, entertainment, and recreation, and accommodation and food services	19.5%
Other services, except public administration	4.2%
Public administration	4.9%

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

⁵ Advisory Council on Historic Preservation, ACHP.gov, [Hailey, Idaho](#), Accessed April 2024.

⁶ Wikipedia.org, [Hailey, Idaho](#), Accessed April 2024.

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

TABLE 1-7: UNEMPLOYMENT RATE

Employment Status	Blaine County
Civilian labor force Unemployment Rate	2.4%

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

The average per capita income (averaged from 2017 - 2021) for the Catchment Area as compared to the national average of \$37,638 and the state average of \$31,509 is shown in **Table 1-8**.⁷

TABLE 1-8: PER CAPITA INCOME

Income and Benefits	Blaine County
Per capita income (dollars)	40,739

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

The estimated average median household income for the Catchment Area as compared to the national average of \$69,021 and the state average of \$63,377 is shown in **Table 1-9**.⁸

TABLE 1-9: MEDIAN HOUSEHOLD INCOME

Income and Benefits (Households)	Blaine County
Median household income (dollars)	71,749

Source: U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

2.0 LIMITED ENGLISH PROFICIENCY

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

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

⁷ U.S. Census Bureau, [US & Idaho Comparison](#), Accessed April 2024.

⁸ U.S. Census Bureau, [US & Idaho Comparison](#), Accessed April 2024.

2.1 NUMBER OF LEP PERSONS IN FRIEDMAN MEMORIAL AIRPORT CATCHMENT AREA

The number of LEP persons in the Catchment Area was estimated using the U.S. Census Bureau’s American Community Survey database, as summarized above. The Catchment Area, Blaine County, has a population of approximately 22,780 persons, five years and over. Of these, approximately 77.1 percent on average speak only English and approximately 22.9 percent on average speak a language other than English at home.⁹ Of the population that speaks a language other than English at home, approximately 13.2 percent on average speak English very well, and approximately 9.7 percent on average speak English less than very well.¹⁰

Of the non-English languages found within the Catchment Area, the predominant languages include (all percentages are approximate) Spanish or Spanish Creole at 97.76 percent, German at 0.81 percent, Other Pacific Island Languages at 0.75 percent, and Tagalog at 0.68 percent. All other languages are at zero percent for non-English languages spoken. **Table 2-1** reflects the aforementioned percentages which are percentages of the non-English languages found within the Catchment Area. Languages not found in the Catchment Area include French (incl. Patois, Cajun), French Creole, Portuguese/Portuguese Creole, Yiddish, Other West Germanic languages, Scandinavian languages, Greek, Russian, Serbo-Croatian, Armenian, Persian, Gujarati, Hindi, Urdu, Other Indic languages, Other Indo-European languages, Chinese, Japanese, Korean, Mon-Khmer(Cambodian), Hmong, Thai, Laotian, Vietnamese, Other Asian languages, Navajo, Other Native North American, Hungarian, Arabic, Hebrew, Polish, Italian, Other Slavic Languages and African languages.

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

Language	Percent of LEP in Catchment Area
Spanish or Spanish Creole	97.76%
German	0.81%
Other Pacific Island Languages	0.75%
Tagalog	0.68%

Source: LEP.gov, [Limited English Proficiency by County](#), Accessed April 2024.

2.2 FOUR-FACTOR ANALYSIS

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

2.2.1 NUMBER OF LEP PERSONS LIKELY TO BE ENCOUNTERED

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

The U.S. Census Bureau Data.census.gov database was used to determine the number of LEP persons in the Catchment Area. Of the 22,780 residents, 5 years and over, in the Catchment Area, approximately 22.9 percent speak languages other than English at home, with the predominant non-English language being Spanish (21.1

⁹ U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

¹⁰ U.S. Census Bureau, [County Comparison](#), Accessed April 2024.

percent). Of the population that speaks a language other than English, only 9.7 percent are identified as speaking English “less than very well”.¹¹

SUN is not an international airport; in the winter and summer season, Alaska, Delta and United provide non-stop jet service between SUN and six major domestic cities, including Salt Lake City (SLC), Denver (DEN), Seattle (SEA), Los Angeles (LAX) San Francisco (SFO) and Chicago (ORD). Year-round service includes daily non-stop flights between SUN and SLC on Delta Airlines. United Airlines offers non-stop daily service to Denver. SUN does not offer international flights. As a result, most passengers originate from cities where English is the primary language.

2.2.2 FREQUENCY OF CONTACT WITH LEP PERSONS

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

Languages Spoken by LEP Persons	A few times a year (non-winter) (12 or less days a year)	Several times a month (non-winter) (13 to 51 days a year)	Winter Season (Several times a month)	At least once a week (52 to 364 days a year)	Winter Season (At least once a week)	Every day (365 days a year)
Spanish or Spanish Creole				X		
French or French Creole	X					
Italian						
Portuguese or Portuguese Creole						
German or West Germanic Languages						
Scandinavian						
Russian						
Armenian						
Hindi, Urdu, and other Indic Languages						
Chinese						
Japanese						
Korean						
Thai						
Laotian						
Vietnamese						
Other Asian Languages	X					
Tagalog	X					
Other Pacific Island Languages						
Arabic						

¹¹ U.S. Census Bureau, [Comparative Social Characteristics](#), Accessed April 2024.

African Languages						
Other and unspecified Languages						

The estimated frequency of contacts with LEP persons is based on direct observations and experience by TSA, Airline, and Airport employees. Several employees were interviewed as part of this study to ascertain the frequency of contacts, which confirmed that the frequency of contacts is low (less than approximately 5%), and that existing and proposed resources (detailed below) are adequate to provide LEP persons with the necessary services.

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

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

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

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

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

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

2.2.4 RESOURCES AVAILABLE AND COSTS IMPOSED

The Airport is categorized as a non-hub primary commercial service airport by the FAA, as reflected in the National Plan of Integrated Airport Systems. As of 2022, the Airport served approximately 52,000 total passengers. The Airport’s approved budget for Airport operations in Fiscal Year 2024 is approximately \$4.4 million, which includes payroll for approximately 16 full-time equivalent staff.

The Airport has paid staff or volunteers in the Airport Terminal routinely for the purpose of providing customer service or assistance. The Airport Administration office is currently located immediately adjacent to the Airport Terminal. The Administration office is available to the public. Airport staff regularly travel through the Terminal and interact with ticketed passengers, “meeters and greeters” and others.

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

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

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

3.0 LANGUAGE ASSISTANCE MEASURES

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

- Provision of translation and interpretive services at public meetings (upon request or as determined by Airport staff to be necessary or supportive of expected LEP persons)
- Provision of on-call contract translation services as needed
- Provision of safety and security announcements in English and Spanish throughout the Commercial Terminal Facility
- Training of Airport staff, concessionaires, and tenants on the use of Google Translate to assist LEP persons
- Maintenance of records of Airport staff, concessionaires, and tenants who are fluent or possess skills in any language besides English
- Coordination with TSA to ensure that the Language Access Binder is available and used at the Airport and customized as appropriate to reflect the specific language assistance needs of LEP persons using the Airport
- Coordination with TSA to identify TSOs who serve as Language Access Program volunteers
- Maintenance of copies of the DHS "I Speak" poster and booklet in the Airport Administration Office
- Updated Airport Emergency Plan to ensure that it addresses the needs of LEP persons during an emergency