

# **Language Assistance Plan (LAP) for the Louisiana Gateway Port (LGP)**

## **Executive Summary**

This Language Assistance Plan (LAP) ensures that the Louisiana Gateway Port (LGP) complies with Title VI of the Civil Rights Act of 1964, guaranteeing meaningful access to its programs and vital services for individuals with Limited English Proficiency (LEP). The Four-Factor Analysis conducted confirms that the primary LEP populations requiring targeted assistance are **Vietnamese** and **Spanish** speakers, consistent with regional demographic trends and local economic specialization. Specifically, the analysis reveals that Vietnamese speakers are highly concentrated in the Southern Delta ZCTAs (e.g., 70050, 70091), where they are intrinsically linked to the commercial fishing industry. This concentration, coupled with geographic isolation, mandates the immediate prioritization of **Vietnamese** and **Spanish** language assistance for all vital documents, safety protocols, licensing, and disaster response communications to mitigate public safety risks and ensure equitable economic participation.

## **1. Introduction and Mandate**

This Language Assistance Plan (LAP) is prepared for The Plaquemines Port, Harbor & Terminal District, doing business as the Louisiana Gateway Port (LGP), located in Plaquemines Parish, Louisiana, to ensure full compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. Title VI prohibits discrimination on the basis of national origin, which includes ensuring meaningful access to programs and activities for individuals with Limited English Proficiency (LEP).<sup>1</sup>

The LGP, as a critical node for global commerce along the Mississippi River corridor, is committed to eliminating language barriers that prevent LEP individuals—including port employees, maritime workers, business partners, and the public—from accessing vital safety, operational, and administrative services.

## 2. Legal Framework: The Four-Factor Analysis

Per federal guidance for recipients of financial assistance, the LGP has conducted a Four-Factor Analysis to determine the appropriate scope and nature of language assistance services. This analysis synthesizes demographic data from Plaquemines Parish and the broader metropolitan area (including neighboring Jefferson Parish) to identify the specific language needs of the service population.

### Factor 1: The Number and Proportion of LEP Persons Served

The analysis of census data confirms that while the majority of Plaquemines Parish speaks English only, specific, critical LEP populations exist, driven by economic and historical factors.

- **Primary LEP Groups (Plaquemines Parish):** Based on ZCTA-level analysis, the most significant non-English speaking communities are **Vietnamese** and **Spanish** speakers, particularly those concentrated in the Southern Delta maritime zones.
  - The Asian population (predominantly Vietnamese) makes up over 4% of the parish population (\$\approx 927\$ individuals as of 2023). This community is critically tied to the fishing and shrimping trades centered in ZCTAs like Empire (70050) and Venice (70091).<sup>2</sup>
  - Spanish speakers are also present, reflecting both historical settlement (Islenos) and current specialized labor in maritime support.<sup>3</sup>
- **Regional Context (Jefferson Parish):** Data from the neighboring Jefferson Parish Transit, which serves portions of Plaquemines' Northern Overlap Zone (ZCTA 70037), also identifies **Spanish** and **Vietnamese** as the two largest LEP language groups in the metropolitan area, confirming the regional priority.<sup>1</sup>

### Factor 2: The Frequency of Contact with LEP Persons

Contact frequency for the Port is considered high, despite the low general population density of Plaquemines Parish. The Port's services are directly related to the two largest LEP groups identified in Factor 1.

- **Maritime Economy:** The Port's jurisdiction is highly engaged with the commercial fishing industry. The high concentration of Vietnamese individuals in the Delta ZCTAs directly correlates with their engagement in fishing and shrimping.<sup>2</sup> LGP services, including environmental regulations, port access, and safety protocols, involve frequent interaction with this language group.
- **Labor and Development:** LGP's ongoing infrastructure and real estate development frequently involves construction and logistics labor, which often includes a high proportion of non-native Spanish speakers, necessitating communications related to safety and site access.

### **Factor 3: The Nature and Importance of LGP Services**

All LGP services are deemed "vital documents" and "vital services" due to their direct impact on economic stability and public safety, especially in a flood-vulnerable delta region.

- **Public Safety and Disaster Response:** LGP plays a role in joint marine safety exercises and is a critical component of disaster response and hurricane evacuation plans. Failure to provide communications in key LEP languages—Vietnamese and Spanish—renders mandatory evacuation orders and marine safety alerts critically ineffective, risking loss of life and property.
- **Economic Access:** Maritime workers with LEP, particularly Vietnamese fishermen, have historically faced barriers to accessing essential financial, insurance, and federal disaster relief programs.<sup>4</sup> LGP services related to port commerce and licensing are therefore vital for economic participation.

### **Factor 4: Resources Available and Overall Costs**

The LGP will utilize in-house resources, language technologies, and established community partnerships to provide assistance in a cost-effective manner. Drawing on best practices from neighboring jurisdictions (Jefferson Parish Transit) and maritime agencies (USCG), services will be scaled based on language necessity.

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## **3. Language Assistance Measures**

Based on the Four-Factor Analysis, the LGP must prioritize assistance in **Spanish** and **Vietnamese**. The LGP adopts the federal **Safe Harbor Provision** threshold: any language group that constitutes 5% or 1,000 persons of the total population qualified to be served requires written translation of vital documents. While the Vietnamese population in Plaquemines Parish may fall below the 1,000-person threshold parish-wide, their high concentration in maritime ZCTAs (e.g., 70050, 70091) and the critical importance of services mandate assistance comparable to that of a Safe Harbor group.

### 3.1. Vital Document Translation (Written)

The LGP will ensure all *vital documents* are translated into **Spanish** and **Vietnamese**.

Document/Material Category	Rationale	Language Requirement
Marine Safety/Operational Notices	Mandatory compliance, vessel tracking, and emergency alerts.	Spanish, Vietnamese, English
Port Facility Access & Licensing Forms	Direct compliance with LGP policies and access to commerce.	Spanish, Vietnamese, English
Title VI Complaint Procedures	Federal mandate for filing discrimination complaints.	Spanish, Vietnamese, English <sup>1</sup>
Disaster/Evacuation Materials	Critical for life safety in storm-vulnerable ZCTAs (70050, 70091).	Spanish, Vietnamese, English
Environmental/Pollution Awareness	Maritime industry best practice.	Spanish, Vietnamese, English

### **3.2. Oral Interpretation (In-Person and Telephonic)**

Oral interpretation services will be provided for all meetings, safety briefings, and customer service inquiries.

- **In-Person/Telephonic Interpretation:** The LGP will maintain a resource list of qualified **Spanish** and **Vietnamese** interpreters and utilize contract phone interpretation services for immediate needs and less common languages (See Appendix A: Interpretation and Translation Vendors).
- **Staff Language Capacity:** Staff with verified fluency in Spanish or Vietnamese will be identified and utilized for internal and public-facing functions, following the precedent set by neighboring agencies.<sup>1</sup>
- **"I Speak" Cards:** Simple language identification cards will be made available at all public points of contact (e.g., front desk, security checkpoints) to quickly identify the language need of an LEP individual.<sup>1</sup>

### **3.3. Training and Outreach**

1. **Staff Training:** All LGP staff and, where appropriate, security contractors, will receive training on Title VI requirements, the LGP LAP, and best practices for interacting with LEP persons.<sup>1</sup>
2. **Community Outreach:** LGP will partner with local community service organizations (e.g., those serving Vietnamese fishing communities) and utilize local Spanish-language media for public notices.<sup>1</sup>
3. **Digital Access:** The LGP official website will utilize translation features (such as Google Translate functionality) to provide immediate access to information in Spanish and Vietnamese.<sup>1</sup>

### **3.4. Public Notification of LEP Services**

The LGP is required to take reasonable steps to notify LEP persons that language assistance is available at no cost, pursuant to 49 CFR § 21.9(d).<sup>1</sup> A brief, easy-to-understand "Notice to LEP Persons" will be prominently displayed in key locations, including the LGP website, posted on signage at Port facilities, and included in printed Port schedules or visitor guides.

This notice will be translated into English, Spanish, and Vietnamese, clearly stating:

**Notice to LEP Persons:** Language assistance services are available to you at no cost. Please ask a Port employee or contact the Port Director's office for assistance.

- **Aviso para Personas con LEP:** Los servicios de asistencia lingüística están disponibles para usted sin costo alguno. Por favor, solicite ayuda a un empleado del Puerto o comuníquese con la oficina del Director del Puerto.
- **Thông báo cho Người có Trình độ Tiếng Anh Hạn chế (LEP):** Các dịch vụ hỗ trợ ngôn ngữ được cung cấp miễn phí cho quý vị. Vui lòng hỏi nhân viên Cảng hoặc liên hệ văn phòng Giám đốc Cảng để được hỗ trợ.

## 4. Monitoring and Updates

The LGP LAP will be reviewed and updated annually.

### 4.1. Key Performance Indicators (KPIs) and Monitoring Metrics

To ensure accountability and effectiveness of the LAP, the LGP will track measurable Key Performance Indicators (KPIs) as part of the annual Title VI self-evaluation:

- **Translation Volume:** Number of vital documents translated (tracked by language).
- **Interpretation Usage:** Total instances of oral interpretation services requested and delivered (tracked by language, mode: in-person/phone).
- **Staff Competency:** Percentage of relevant LGP staff completing mandatory LEP/Title VI training annually.
- **Complaint Rate:** Number of Title VI complaints filed related to inadequate language access.

### 4.2. Annual Review Components

The annual review will include:

1. **Complaint Tracking:** Monitoring all Title VI-related complaints, specifically those

alleging failure to meet the needs of LEP persons.<sup>1</sup>

2. **Data Review:** Utilizing the most recent ACS ZCTA data for Plaquemines Parish to determine any demographic changes in language groups.<sup>1</sup>
3. **Resource Sufficiency:** Assessing the adequacy of translated materials, interpreter services, staff training, and budget allocated for language assistance.<sup>1</sup>

#### 4.3. Plan Dissemination and Public Access

For public transparency, the full, currently adopted LAP will be made easily accessible to the public and all stakeholders. The LAP will be permanently posted on the LGP official website, accessible via the main navigation menu under **Civil Rights / ADA Compliance**. Hard copies of the document will be made available upon request to the Director's office.

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#### Appendix A: Interpretation and Translation Vendors

The LGP maintains relationships with the following contracted or recommended language assistance providers to ensure rapid response to LEP needs:

<b>Vendor Name</b>	<b>Primary Service Provided</b>
Multi-Language Solutions LLC	Telephonic Interpretation / Document Translation
TraduccionOLA LLC	In-Person Interpretation / Specialized Translation
<i>Note:</i>	<i>The LGP reserves the right to utilize additional certified community-based or professional translation services as necessary.</i>

## Works cited

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