



UTAH TRANSIT AUTHORITY



Title VI Program
Updated 2019

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INTRODUCTION

Transportation has been at the forefront of the push for equal treatment and civil rights. Transit is a point of integration and opportunity for those that need and use it. Transit serves as a bridge within homes and communities, connecting people both socially and professionally. Transit's unique position in our society has put it in the center of the fight for equality in the United States. From the early fight against the segregation of rail cars in the 19th Century to the impetus of the modern Civil Rights movement when Rosa Parks refused to give up her seat and the Montgomery Bus Boycott that followed, Transit has been part of the movement. The Utah Transit Authority (UTA), under the guidance and direction of the Federal Transit Administration's guidance found in Circular 4702.1B "Title VI Requirements and Guidelines" prepares this Title VI program as an intentional process aimed at preventing unintentional discrimination in the delivery of our services and programs.

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

The Civil Rights Act of 1964 was signed into law to combat and curtail common practices that systematically denied the rights of certain people based on their race, the color of their skin and/or the nation in which they were born. The act included eleven "titles", which provided legal protections and outlined requirements aimed at the equitable treatment of historically disadvantaged populations.

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participating in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.
- Title VI of the Civil Rights Act of 1964

Title VI specifically outlines that agencies, such as UTA, must ensure the equitable distribution and delivery of its federally funded programs and services. In consideration of the extensive reach of transit agencies' ability to impact the lives of those who utilize its services, the Federal Transit Administration (FTA) has issued specific guidance on Title VI compliance in FTA Circular 4702.1B. The circular is designed to help FTA recipients ensure the level and quality of public transportation service is provided in a nondiscriminatory manner, promote full and fair participation in public transportation decision-making without regard to race, color, or national origin and ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

UTA'S COMMITMENT

UTA has established a series of core values that guide its service model, one of which is inclusivity. The organization welcomes robust representation and diversity and prioritizes the community it serves as a True North that guides its decisions and service. It is the Authority's commitment to follow what John F. Kennedy called "simple justice, [which] requires that public funds, to which all taxpayers of all races contribute, not be spent in any fashion which encourages, entrenches, subsidizes, or results in racial discrimination."

GENERAL REQUIREMENTS

All recipients of funding from the FTA are required to “keep such records and submit to the secretary timely, complete, and accurate reports at such times, and in such form and containing such information, as the secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this [rule].”¹ Guidance on how to fulfill recordkeeping requirements are further elaborated upon and clarified within FTA circular 4902.1B. The circular states that primary recipients must submit their documentation of compliance on a three year basis and that the entity’s governing entity must approve the Title VI Program prior to submission. The approval of UTA’s Title VI Program has been included as [Attachment I](#).

Chapter III of the circular also outlines the components that are required of all recipients of FTA funds. They include:

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. List of Title VI Investigations, Complaints, and Lawsuits
4. Public Participation Plan
5. Language Assistance Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Facilities Siting and Construction
9. Equity Analyses of major service and fare changes implanted since the previous Title VI program submission

TITLE VI NOTICE TO THE PUBLIC

The FTA requires that transit agencies inform the public of their rights and protections under Title VI. UTA strives to keep members of the public apprised of their rights and protections against discrimination afforded them in Title VI by providing and posting a notice to the public explaining their rights at various locations throughout the system and on UTA’s website, Rideuta.com. A copy of the notice can be found in [Attachment A](#).

LIST OF LOCATIONS NOTICE IS POSTED

UTA has taken action to make this notice visible and consistently present throughout its transit system. Below is a list of the locations the notice is posted.

- All TRAX and FrontRunner train stations
- All fixed route and paratransit buses
- UTA Front Lines Headquarters entrance at 669 West 200 South, Salt Lake City
- Customer Service / Lost & Found Office, 600 West 250 South, Salt Lake City
- Customer Service Office, 3600 South 700 West, Salt Lake City
- Timpanogos Transit Center, 1145 South 750 East, Orem

¹ 49 CFR Part 21.9(b)



- Ogden Transit Center, 2393 South Wall Ave, Ogden

TITLE VI COMPLAINT PROCEDURE

UTA’s Title VI notice to the public includes instructions on how to file a complaint alleging discrimination on the basis of race, color and national origin through UTA’s customer service line. There is also an option to submit a complaint online or through a downloadable Civil Rights complaint form. Any complaint received through the customer service line can be flagged as Civil Rights related and the Civil Rights Department is notified through the electronic customer feedback database where complaints are recorded and tracked. Included in [Attachment B](#) is UTA’s official Civil Rights complaint form in English and Spanish. An ADA accessible version of this form that can be translated into multiple languages is available through an online form, which is emailed directly to the Civil Rights Department.

UTA follows Corporate Policy 5.1.1, Customer Communications, which is included as [Attachment C](#) in this program. This corporate policy outlines the process used to investigate and track complaints related to Title VI.

TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.
 - FTA Circular 4702.1B

In compliance with the above directive, UTA will list all investigations, lawsuits and complaints throughout the period of 2016, 2017 and 2018.

INVESTIGATIONS

On February 19, 2016, Michael Clara filed Complaint No. 2016-0151 with FTA. In that complaint, he primarily alleged that UTA failed to grant a request by the Glendale Middle School Community Council to install a bus stop and that UTA had failed to conduct a service equity analysis of its streetcar project. UTA submitted a response on June 17, 2016. FTA informed Mr. Clara by letter dated October 7, 2016 that the information reviewed by FTA did not support a finding that UTA had failed to comply with Title VI requirements.

LAWSUITS

There were no Title VI lawsuits during the reporting period.

COMPLAINTS

UTA has had 195 customer service complaints in which the complainant alleged discrimination on the basis of race, color, or national origin. A full list of the complaints is

included as [Attachment D](#). These complaints were received, investigated and resolved internally by UTA staff in accordance with UTA Corporate Policy 5.1.1 ([Attachment C](#)).

A customer has many options when making a complaint alleging discrimination. A customer can call into customer service, submit an electronic Civil Rights complaint through UTA's online form, submit a paper form, or issue a complaint to any department where a record can be recorded and tracked with UTA's customer feedback database. This is an intentionally inclusive approach, designed to ensure that any complaint alleging discrimination on the basis of a protected class is addressed appropriately and that Civil Rights staff is notified and involved where appropriate.

PUBLIC PARTICIPATION PLAN

Public involvement is an integral part of proactively ensuring unintentional negative impacts on protected populations. In order to incorporate the voices of the public in its planning, service, and programs UTA has developed two policies. They are 1.1.28 – Title VI Compliance Policy ([Attachment E](#)) and 1.1.6 – Public Input Opportunities ([Attachment F](#)). These policies outline the outreach methods used to engage minority and limited English proficient populations in discussions about service and fare changes.

SUMMARY OF OUTREACH EFFORTS

The Authority has the potential of implementing major service changes three times per year on “change day”. These change days occur once in April, August, and December. With the exception of the Provo-Orem BRT analysis being approved in March of 2018, all of the major changes and solicitations for public input occurred during these times of year. The following change days had at least one major change and included a public input process.

- April 2016
- August 2016
- December 2016
- April 2017
- August 2017
- April 2018
- August 2018
- December 2018

APRIL 2016 PUBLIC OUTREACH

The April 2016 change day had two route eliminations, four routes with route changes, two routes with increased frequency, trips added to two routes and various minor adjustments to routes to improve service and efficiency.

PUBLIC OUTREACH & COMMENT

Public comment period held December 18 – February 5. Below is a summary of the activities UTA conducted to inform riders and solicit feedback.

- Public hearing notice was published in the *Provo Daily Herald*, on the state website and on UTA’s website.
- A formal public open house was held January 5 at the Provo City Library.
- Comments were accepted via UTA’s website, via email at hearingofficer@rideuta.com, through the mail and by phone through UTA Customer Service.
- Notices placed on affected bus routes to inform riders of the proposed changes and opportunities to provide comment.
- Personal contact made with the customers on the affected routes; alternative transportation solutions for affected riders being discussed.
- Proposed changes presented to Utah County local elected officials at the February meeting of the Utah County Regional Planning Committee.

SUMMARY OF COMMENTS

During the comment period, UTA received a total of four comments. Two comments were received at the open house and the other two comments received via email. Below is a summary of the comments received.

- One commenter was in favor of the changes due to the increased service on other routes.
- One commenter was disappointed, but understood the reasons for the changes after discussion with staff.
- One commenter opposed the change due to personal hardship; staff is working on alternative solutions.
- One comment was unrelated to the proposal.

AUGUST 2016 PUBLIC OUTREACH

PUBLIC COMMENT AND OUTREACH

In accordance with UTA policy, a public comment period was held from April 22 through May 23, 2016. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- The public hearing notice was published in *The Salt Lake Tribune* and the *Deseret News*, on the state website and on rideuta.com.
- A formal public open house was held for changes made in the Salt Lake Business Unit at West Valley City Hall at 3600 South Constitution Boulevard in West Valley City.
- A formal public open house was held for changes made in the Mt. Ogden Business Unit at the Davis County Central Library at 155 Wasatch Drive Layton, UT
- Comments were accepted via UTA’s website, via email at hearingofficer@rideuta.com, through the mail, and by phone through UTA Customer Service.
- Notices were placed on the affected bus routes to inform riders of the proposed changes and opportunities to provide comment.

- The proposed changes were discussed in a business meeting with Salt Lake County representatives and UTA planners.

Overall, four comments were received for the Salt Lake Business Unit during the proposal’s comment period – one at the public hearing and three at hearingofficer@rideuta.com. Low participation is directly related to the proposed changes eliminating required transfers, allowing passengers on these routes to experience a “one-seat” ride while traveling east to west across the Salt Lake Valley. Cost savings from the changes would also allow planners to increase Sunday frequency on routes 33 and 35.

Eight comments were received for the Mt. Ogden Business Unit during the proposal’s comment period – six at the public hearing and two at hearingofficer@rideuta.com

COMMENTS:

SALT LAKE BUSINESS UNIT:

- One commenter wrote that he “strongly supports” the proposed changes.
- A second commenter supported the changes but also suggested that routes 41 and 45 be combined in the same manner.
- One online commenter didn’t provide feedback on the proposal but did ask for more service in the Draper and South Jordan areas.
- The fourth comment was received at the official public hearing and asked UTA to make adjustments in its ridership counting methodology.

MT. OGDEN BUSINESS UNIT:

- One commenter expressed support for the changes
- Two commenters said they supported the changes and suggested more service to a local school
- One commenter expressed a desire for a stop near the mall
- Three commenters didn’t provide feedback on the proposal but did ask for more service elsewhere.
- One commenter expressed concern on the routes he used to ride no longer providing for his needs and made suggestions on how they could be improved.

OUTCOME:

Based on the feedback received, the following changes were made:

- Route 33 was extended from the Millcreek TRAX Station to West Valley Central Station. It follows the previous path for route 35 and will run on 15-minute headways on weekdays.
- Route 35 terminates at West Valley Central Station. Routes 33 and 35 will always interline so passengers no longer need to transfer at West Valley Central Station.
- Span of service on Sundays for routes 33 and 35 was extended from 9 a.m. to 7 p.m. to 7 a.m. to 8 p.m.
- Sunday service frequency for routes 33 and 35 were increased, providing all-day, 30 minute service. Previously, the routes offered 60-minute frequencies on Sundays.

- Route 39 terminates at the Meadowbrook TRAX Station and interlines with route 41. This eliminated the need for passengers to transfer buses in order to continue traveling east or west.
- All changes proposed in Mt. Ogden Business Unit proceeded as proposed.

The primary reason for these changes was to improve the passenger experience by giving riders a one-seat ride across the valley along two major corridors (3300/3500 South and 3900/4100 South).

APRIL 2017 PUBLIC OUTREACH

ROUTE 667

The public comment period for this change occurred from January 5 to February 5 of 2017. Notice was listed on UTA’s website, the state website, Utah.gov, the *Ogden Standard Examiner* and the *Davis County Clipper*, both local newspapers. Comments were accepted via mail, email, at the public hearing and by phone. The public hearing was held on January 19, 2017. It was publicized by and held at the PARC facility. Seven people attended this meeting and there was no opposition to the proposed changes. One respondent was somewhat supportive, but offered alternative proposals. This information was provided to the Planning Department for consideration.

In addition to the public hearing and public comment period, all known riders’ care providers were identified and directly contacted by UTA’s Special Services Business Unit.

ROUTE 477

The public comment period for this change occurred from January 5 to February 5 of 2017. Notice was listed on UTA’s website, Utah.gov, the *Ogden Standard Examiner* and the *Davis County Clipper*, both local newspapers. The public hearing was held on January 19, 2017. Comments were accepted via mail, email, at the public hearing, phone and Open UTA, which is an online forum for discussion. The public outreach hearing was held January 26, 2017 at the Farmington City Hall. In addition to this, UTA made direct contact with Farmington City, Station Park, Lagoon, Hampton Inn and the University Medical Center in the region regarding the change.

Response from Farmington City and local businesses were all positive and 50% of community members were in support of the changes. 50% of community responses were opposed. The three respondents in opposition to the changes expressed concern regarding access to Lagoon and downtown Farmington locations during peak times. Alternative routes, specifically routes 455 and 470, are able to provide transportation to the specified locations. One respondent suggested running a second route to downtown or having the 667 resume a more frequent downtown schedule during Lagoon’s off-season. UTA Planning is considering both options for future proposed changes.

AUGUST 2017 PUBLIC OUTREACH

For August 2017 Change Day, the UTA Ogden Business Unit proposed changes for routes 626 and 627 and the elimination of routes 664 and 665, which provide service to Hill Air

Force Base. UTA proposed changing the southern terminus of route 626 to the Clearfield FrontRunner station instead of the Weber State Davis campus. The route would then change to the 627 at the Clearfield FrontRunner station and continue to the Weber State Davis campus.

PUBLIC COMMENT AND OUTREACH

In accordance with UTA policy, a public comment period was held from April 10 through May 10, 2017. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- The public hearing notice was published in the *Standard Examiner*, the *Davis County Clipper*, on the state’s public notice website and on rideuta.com. Information on the comment period was also published on UTA’s social media channels.
- One formal public open house was held on April 25 at the Weber State Davis Campus (2750 University Park Blvd., Layton, Utah). The hearing was attended by 11 people.
- Fliers were posted on Ogden Business Unit buses, especially those that serviced the base.
- Hill Air Force Base was directly contacted, and UTA worked with the base to publicize the comment period.
- Comments were accepted via UTA’s website, via email at hearingofficer@rideuta.com, through the mail and by phone. Comments were also accepted on the Open UTA platform. (59 comments overall for route 664 and 665 proposal, 33 visitors for the route 626 and 627 proposal). Registered users on Open UTA received an email inviting them to review the proposals and provide feedback.

Overall, 12 comments were received during the proposal’s comment period for the route 626 and 627 proposal – two at the public hearing, six on Open UTA and four at hearingofficer@rideuta.com. For the route 664 and 665 proposal, 30 comments were received – 7 at the public hearing, 8 at hearingofficer@rideuta.com and 15 on the Open UTA system.

THE PROPOSED CHANGES WERE AS FOLLOWS:

(From the public notice)

Routes 626 and 627 – The route 626 proposal includes moving the southern terminus of the route to the Clearfield FrontRunner station instead of the Weber State Davis campus. The route will then change to the 627 at the Clearfield FrontRunner station and continue to the Weber State Davis campus. The route 627 proposal also includes extending the north section of the route from the Weber State Davis campus to the Clearfield FrontRunner station, where it will connect with the realigned 626. No other changes are proposed for the existing 626 or 627 alignments. The proposal also includes adding 30-minute peak hour weekday service to both routes, increasing the weekday span of service to roughly 9 p.m., and adding 60-minute Saturday service to both routes.

(From the public notice)



Routes 664 and 665 – UTA proposes to eliminate these two routes due to low ridership. Representatives from UTA Rideshare will be available to explain vanpool and other transportation options during the public hearing.

COMMENTS:

For routes 626 and 627 – Eleven comments were in support of the proposal. One comment received was neutral and offered an alternative service scenario.

For routes 664 and 665, five comments were for the proposal, 20 comments were against, and 5 were neutral or undecided. Many commenters offered alternative proposals, all of which were forwarded to the planning staff at the Ogden Business Unit.

OUTCOME:

Based on the feedback received and other factors, both proposals moved forward for UTA's August Change Day beginning April 17, 2017.

APRIL 2018

For April 2018 Change Day, the UTA Timpanogos (Utah County) Business Unit proposed changes for routes 833, 834, 840 and 864. The proposal for routes 833 and 834 included the elimination of two weekday trips due to schedule changes related to the implementation of Positive Train Control on FrontRunner and a discontinuation of all Saturday trips due to low ridership. The route 840 (a seasonal route) proposal called for the route to be discontinued and replaced by adding additional route 841 trips, and the route 864 is a proposed new route to serve the west side of I-15 near the Lehi Station.

PUBLIC COMMENTS AND OUTREACH

In accordance with UTA policy, a public comment period was held from January 4 through February 13, 2018. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- The public hearing notice was published in the *Provo Daily Herald*, on the state's public notice website and on rideuta.com. Information on the comment period and hearing was also published on UTA's social media channels. In addition, the UTA's Special Services business unit sent postcards to each impacted paratransit customer or to the customer's caregiver.
- Two formal public open houses were held. One open house took place January 18 at the Provo City Library (550 North University Avenue in Provo, Utah), and the second took place January 29 at the Provo Recreation Center (320 West 500 North in Provo, Utah). A total of 28 people attended the two hearings.
- Fliers were posted on select Utah County buses and on Utah County paratransit vehicles.
- Comments were accepted via UTA's website, via email at hearingofficer@rideuta.com, through the mail and by phone.

Overall, seven comments were received on all proposals. One commenter (received via email) provided feedback in regards to the proposed new route, route 864. The commenter suggested some adjustments to the proposal in order for transit to better accommodate his growing business. The commenter also offered to provide bus turnaround and pull out locations near his office building.

A total of six comments were received regarding the service proposals for routes 833 and 834 – four via email, one at the public hearing and one via telephone. All comments were in opposition to the elimination of Saturday service on these routes, mainly due to the negative impact this change would have on area paratransit customers. Additionally, at the public hearing held on January 29, those who attended were generally opposed to the changes for route 833.

No comments were received regarding the proposed cancellation of route 840.

THE PROPOSED CHANGES WERE AS FOLLOWS:

(From the public notice)

- Route 833: Elimination of two weekday trips due to schedule changes. All Saturday trips will be discontinued due to low ridership.
- Route 834: Elimination of two weekday trips due to schedule changes. Route will be extended to the intersection of Orem Center Street and State Street to allow for transfers to route 850 near Orem City Offices. All Saturday trips will be discontinued due to low ridership.
- Route 840: Route to be discontinued and replaced by adding additional route 841 trips. Proposed change will provide customers with more seat availability between the Orem FrontRunner Station and Utah Valley University.
- Route 864: This is a proposed new route to serve the west side of I-15 near Lehi Station. Route will be interlined with route 863 and will only offer weekday peak hour service.
- The proposed fixed bus route changes should be of interest to paratransit eligible riders. UTA is required to provide paratransit at a comparable level of service as to what is provided by the fixed route system. The public transportation guidelines of the Americans with Disabilities Act (ADA) require UTA to provide paratransit services only within a $\frac{3}{4}$ mile service corridor on either side of a fixed bus route and around a light rail (TRAX) station. UTA Paratransit must provide services during the same days and hours of operation as these fixed route services. Areas that would no longer have fixed bus routes would no longer have direct curb-to-curb paratransit services.

OUTCOME:

Based on the feedback received and other factors, the proposal for route 833 did not move forward. For route 834, the proposed alignment changes proceeded, but Saturday service was not eliminated. Route 840 is seasonal service, and the route was discontinued for the season but was not permanently eliminated as proposed, and the addition of route 864 proceeded as outlined. Service changes begin April 8, 2018.

AUGUST 2018 & PROVO-OREM BRT (UVX)

TIMPANOGOS BUSINESS UNIT

For August 2018 Change Day, the UTA Timpanogos (Utah County) Business Unit proposed changes to several routes. The proposed changes were as follows:

NEW SERVICE

- The Provo-Orem BRT, now called the Utah Valley Express or “UVX,” will begin operation, replacing the Routes 830 and 838 fixed bus service.

ALIGNMENT CHANGES

- Route 821: realigned near the Provo Towne Center Mall to use University Avenue between East Bay Blvd. and 920 South in both directions in south Provo. Provo Towne Centre Mall will be served by UVX.
- Routes 811/850/862: stop changes in Orem to connect to UVX near Orem University Place Mall.

CONNECTING CHANGES

- Route 841: more trips to enhance connectivity between Orem Station/UVU.
- Route 840: eliminated around campus (all stops covered by 841).
- Route 862: extended to the Orem Station and replace some Route 830 stops.

PUBLIC COMMENTS AND OUTREACH

In accordance with UTA policy, a public comment period was held from April 25 through May 24, 2018. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- A public hearing notice was published in the *Provo Daily Herald*, on the state’s public notice website and on rideuta.com. Information on the comment period and hearing was also published on UTA’s social media channels.
- Three formal public open houses were held: on May 15 from 5-7 p.m. at the Provo City Library; on May 16 from 6-8 p.m. at the Spanish Fork Senior Center; on May 17 from 5-7 p.m. at the American Fork Senior Center.
- A total of 10 people attended the three public hearings.
- Comments were accepted via UTA’s website, via email at hearingofficer@rideuta.com, through the mail and by phone.

A total of seven comments were received regarding the service proposals. One via email and six at the public open houses. Comments included excitement about the opening of the UVX and support for FrontRunner service and passes for UVU, desire for more bus service overall, and concern/suggestions for improving connections/transfers between FrontRunner and bus. One person commented that it’s difficult to go to Salt Lake County for paratransit eligibility.

Based on the feedback received and other factors, the proposed service changes will be implemented on August 13, 2018. In addition, an unrelated comment received regarding Route 831 was adopted by UTA service planners.

SALT LAKE BUSINESS UNIT

For August 2018 Change Day, the UTA Salt Lake (Salt Lake County) Business Unit proposed changes weekday and Saturday changes to Routes 33, 35 and 35M, and changes to Routes 39 and 41. The proposed changes were as follows:

WEEKDAYS

- Route 35M: Begin service at 6 a.m. and end service at 7 p.m.
- Route 33 and 35: Begin service at 4:15 a.m. from Magna and 5:15 a.m. from Millcreek Station. Service would begin early enough from Magna that the existing connection to the first northbound Blue Line TRAX would be maintained. End service at 10:30 p.m. from Magna and 11:30 p.m. from Millcreek Station.

SATURDAYS

- Route 35M: Begin service at 9 a.m. and end service at 7 p.m.
- Route 33 and 35: Begin service at 6 a.m. and end service at 11 p.m. Service on 3300 South between Millcreek Station and Wasatch Boulevard, would largely remain the same.

ROUTES 39 AND 41: to make better connections to the Green Line at West Valley Central Station.

- Route 39: extend west from Meadowbrook Station to West Valley Central Station via the current Route 41 alignment. At West Valley Central Station, Route 39 would turn into Route 41, maintaining a one-seat ride between Wasatch Blvd. and 5600 West.
- Route 41: shorten route to end at West Valley Central Station on the eastern end. At West Valley Central Station, Route 41 would turn into Route 39, maintaining a one-seat ride between 5600 West and Wasatch Boulevard.

PUBLIC COMMENTS AND OUTREACH

In accordance with UTA policy, a public comment period was held from April 18 - May 17, 2018. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- A public hearing notice was published in the *Salt Lake Tribune and Deseret News*, on the state's public notice website and on rideuta.com. Information on the comment period and hearing was also published on UTA's social media channels.
- Two formal public open houses were held: on May 3 from 4-6 p.m. at West Valley City Hall; on May 9 from 6:30-8 p.m. at the Magna Library.
- A total of 6 people attended the public hearings.

- Comments were accepted via UTA’s website, via email at hearingofficer@rideuta.com, through the mail and by phone.

A total of five (5) comments were received regarding the service proposals. One via email, one via phone to Eric Callison, and three at the public open houses. Comments included support for the changes to Route 39 and 41, concern about travel time on Route 35 versus Route 35M, concern about connections, and a comment about future plans to extend Route 35M to the top of 3300 South.

Based on the feedback received and other factors, the proposed changes to morning service on Route 33, 35 and 35M were not implemented. The remaining proposed service changes began August 13, 2018.

OGDEN BUSINESS UNIT

For August 2018 Change Day, the UTA Ogden (Davis and Weber Counties) Business Unit proposed the following service changes:

- FrontRunner: commuter rail service will be suspended between Ogden and Pleasant View after August 10, 2018.
- Route 616: modified schedule with increased frequency and span of service in conjunction with the FrontRunner changes.

PUBLIC COMMENTS AND OUTREACH

In accordance with UTA policy, a public comment period was held from May 1 – June 1, 2018. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- A public hearing notice was published in the *Ogden Standard Examiner*, on the state’s public notice website and on rideuta.com. Information on the comment period and hearing was also published on UTA’s social media channels.
- Two formal public open houses were held: on May 16 from 4:30 – 6:30 p.m. at the Pleasant View Municipal Building; on May 17 from 4:30 – 6:30 pm. at the North Ogden City Council Chambers.
 - A total of 1 person attended the public hearings.
- Comments were accepted via UTA’s website, via email at hearingofficer@rideuta.com, through the mail and by phone.
- Two additional open houses were held in advance of the formal public hearings: May 12 in Pleasant View and May 14 in North Ogden.
 - A total of 41 people attended the open houses
- An on-board survey was also conducted of riders on FrontRunner between Ogden and Pleasant View (northbound and southbound) and on Route 616. The survey was also made available at the open houses.

A total of two comments were received regarding the service proposals, both via email. Comments included support for the proposed changes to Route 616 and expressed desire for more bus service – specifically on the west side of I-15 through Farr West - and future

long-term improvements to FrontRunner. One comment reflected over-crowding on some trips since the previous change day.

Based on the feedback received and other factors, the proposed service changes will be implemented on August 13, 2018.

DECEMBER 2018

SPECIAL SERVICES BUSINESS UNIT

For December 2018 Change Day, the UTA Special Service Business Unit proposed implementing a new Flex route, F605, to service the Centerville, West Bountiful, Woods Cross and Bountiful communities. Flex route buses run on a fixed route and schedule, but unlike regular bus routes, passengers can request in advance a deviation or a special stop up to $\frac{3}{4}$ of a mile from the regular route.

The route is proposed to have a fixed alignment with set time points but will deviate up to $\frac{3}{4}$ mile upon advanced request. The route is also proposed to run select trips to the Woods Cross FrontRunner station. The proposed F605 would operate weekdays from 6:00 a.m. to 9:00 p.m., with 30-minute frequency all day. No Saturday or Sunday service is proposed.

PUBLIC COMMENT AND OUTREACH

In accordance with UTA policy, a public comment period was held from September 11 through October 10, 2018. Several activities were conducted during this period to inform riders and the public and obtain feedback.

- A public hearing notice was published in the *Salt Lake Tribune*, *Ogden Standard Examiner* and the *Davis County Clipper*. The notice was also published on the State's public notice website and on www.rideuta.com. Information on the comment period was also published on UTA's social media channels.
- One formal public open house was held on September 26, 2018 from 4:30 p.m. until 6:30 p.m. The open house was held at the Davis County Library South Branch.
- Comments were also accepted via UTA's website, email at hearingofficer@rideuta.com, through the mail and by phone.

A total of three people attended the open house, although none submitted written comment. A total of eight (8) comments were received by email to hearingofficer@rideuta.com, and a total of seven (7) comments were received via UTA's website and Customer Comment system. One of the comment received included a letter from residents of Centerville, Utah accompanied by the names and addresses of 86 residents.

Comments included support for the new route, but concerns were expressed about a section of the alignment along DaVinci Lane between Main Street and 400 West, and the proposed location for a bus stop.

Based on the feedback received and in response to residents' significant concerns about the route along DaVinci Lane, UTA proceeded with implementing the new route in December, but planners adjusted the alignment for the F605 to use 400 South instead of DaVinci Lane.

LANGUAGE ASSISTANCE PLAN

UTA is committed to being fully compliant with Title VI and Executive Order 13166 and to truly find ways to provide meaningful access to people with limited English proficiency. In order to accomplish this, UTA prepared a Limited English Proficiency (LEP) Plan and has included it in this program as [Attachment G](#).

SUBRECIPIENT MONITORING

To provide subrecipients of federal funds assistance and information to ensure continued compliance with all grant requirements, UTA conducts three levels of subrecipient monitoring: project oversight, assessments and ongoing assistance.

PROJECT OVERSIGHT

UTA's Subrecipient Monitoring Procedures outline pre and post-award compliance requirements for subrecipients including pre-award document submission and review, post award compliance monitoring and closeout. Subrecipients are required to upload financial and program documents and civil rights documents including a Title VI plan during the application process.

Post-award compliance activities ensure subrecipients are compliant with federal and state regulations. For the eligible activities in this program, this includes compliance in areas such as financial management, technical capacity, procurement, asset management (use, protection, maintenance, etc.), and civil rights, including Title VI, ADA, and DBE.

UTA requires all subrecipients to follow UTA's policies and procedures. As part of UTA's compliance program, site visits and inspections are performed for each subrecipient at least biennially. Quarterly and annual financial and performance reporting are also required to ensure subrecipients are using federal funds for the purpose they were intended. All UTA subrecipient awards are managed through an online grant management system which generates notifications to subrecipients when reporting and other compliance activities are due. UTA is also notified when subrecipients submit reports and if subrecipients are non-compliant with reporting requirements.

Close-out activities are conducted following final payment of funds for the project. All expenses, reimbursement and procurement activities are reviewed and a final report is completed by the subrecipients to ensure compliance with the award requirements. Additional continuous control responsibilities are reviewed.

ASSESSMENTS

The Grant Administrator performs annual risk assessments of subrecipients by conducting annual compliance reviews, which includes reviewing external annual audits, monthly/quarterly performance reports and Title VI plans and other documents. If results of assessments identify known or potential concerns, the Grant Administrator may conduct additional procedures such as testing payments, site audits to gain an understanding of internal controls and ensuring federal requirements are met including equipment reporting

wage requirements, match and suspension and debarment when applicable. All procurements over \$3,000 are conducted by UTA to ensure compliance with federal procurement rules.

Further, the Grant Administrator monitors and provides feedback and training to subrecipients on federal compliance requirements. UTA's Internal Audit and Accounting Departments also serves as a resource to management in providing special reviews of financial, operational and/or regulatory compliance. Upon request, Internal Audit can review selected programs and assist staff with recommendations by providing independent and objective consulting services.

SUBRECIPIENT TITLE VI PROGRAM REVIEW

As a designated recipient of FTA funds, UTA receives, administers and allocates funds to subrecipients and is responsible for documenting compliance with Title VI. UTA's responsibilities include monitoring subrecipient compliance with Title VI, collecting and reviewing Title VI documents, including subrecipient Title VI data to FTA and providing assistance and support to subrecipients.

In the case in which a primary recipient extends federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.

- Title VI Circular

UTA and its sub-recipients receiving funds or equipment from the federal government through UTA are required to submit the following information as part of their application and periodically as required by FTA thereafter, as long as a federal interest remains in their equipment or program:

- Title VI Plan—must be updated no less than every 3 years;
- LEP—Limited English Proficiency Plan submitted as part of the Title VI plan
- FTA Certifications and Assurances—must be signed and submitted annually
- Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.

To monitor Title VI compliance, UTA:

- Documents subrecipient compliance with the general requirements;
- Collects and maintains subrecipient Title VI program documents on a designated schedule; and
- Forwards subrecipient Title VI information to the FTA, if requested.

Subrecipients must submit a Title VI Plan to UTA with their application. Technical assistance with development of their plan including access to UTA Title VI demographic information and

analysis, sample documents, the option to adopt UTA’s Title VI Program elements including public involvement activities. Title VI resources are also available through the UTA Mobility Management website ([www.utahridelink.org /5310-Grant/5310-Resource](http://www.utahridelink.org/5310-Grant/5310-Resource)). UTA reviews all subrecipient Title VI Programs on a biennial basis and also receives and reviews annual reports submitted on or by Sept. 30th.

BOARD MEMBERSHIP AND RECRUITMENT

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

- Title VI Circular

UTA has one committee, the Committee on Accessible Transportation, and one board, the Citizen’s Advisory Board, that are selected internally and are subject to the Title VI Circular’s requirement above. The UTA Board of Trustees and Local Advisory Council are appointed by the Utah Governor or local counties and municipalities.

COMMITTEE ON ACCESSIBLE TRANSPORTATION (CAT)

UTA established an advisory committee in the 1980s to discuss disability related issues long before the passage of the Americans with Disabilities Act. That committee evolved into the Committee on Accessible Transportation (CAT). After the passage of the ADA in 1990, the UTA Board of Trustees formally created the CAT by way of a charter. The purpose of the CAT is to provide an ongoing opportunity to advise UTA on accessibility issues related to facilities, service, equipment, plans and programs to assure non-discrimination for people with disabilities. Representatives of all ages, disabilities and minority groups, as well as residents in all UTA service areas, are invited and encouraged to serve on the Committee.

When UTA seeks to fill positions on the CAT, posters are placed on all fixed route buses (when seeking multiple positions), information is posted on the home page of UTA’s website, and social media sites are used to reach out to the general riding public. This broad-based recruitment seeks to build a Committee with a range of experiences within the disability community in order to address various questions on accessibility within the transit system. The CAT consists of people with disabilities, advocates, and service providers within the service area.

In an effort to engage minority populations, the CAT membership application states, “UTA’s inclusive transportation services are offered to a diverse rider community and geographic areas. Involvement on the CAT is encouraged by individuals representing various races, colors and national origins.”

CITIZEN’S ADVISORY BOARD (CAB)

The Community Transit Advisory Committee (CTAC) was created in 2015 to give a voice to the citizens within the service area. In the 2017 legislative session, the Utah legislature formalized the Citizen’s Advisory Board (CAB) as a requirement to transit districts serving



over 200,000 people and stipulated that board membership should represent, “the diversity of the public transit district area.” Although not legally required any longer, UTA is still incorporating the CAB into its service delivery.

As UTA sought to engage potential membership for the CAB that would “represent the diversity of the service area”, various agencies and businesses were asked for nominations of potential CAB members.

UTA’s outreach efforts included engagement with:

- 14 advocacy groups representing minority groups, low-income populations, and persons with disabilities,
- 5 agencies representing seniors
- 8 educational institutions
- 4 chambers of commerce
- 5 businesses
- 6 outdoor recreational entities
- Utah Department of Workforce Services, which represents a comprehensive state resource for employment, public assistance, refugee services, and more
- 2 governmental stakeholders

These nominations were taken and a final group of 10 individuals were selected to serve on the CAB.

COMPOSITION OF MEMBERSHIP BY RACE/ETHNICITY

	Number of Members	White	Black	Hispanic	Asian	Hawaiian Native and Pacific Islander
CAT	12	12	0	0	0	0
CAB	10	7	0	2	0	1

FACILITIES SITING AND CONSTRUCTION

The FTA, in accordance with 49 CFR part 21, requires that recipients conduct a Title VI equity analysis during the planning stages when determining the site or locations of facilities in order to ensure that any displacements of persons from their residences and businesses are not determined on the basis of race, color, or national origin.

During the time period of this report, there were no “facilities” sited for construction that would meet the definitions and requirements as outlined in the circular.

SERVICE AND FARE EQUITY ANALYSES

The FTA’s circular requires that every fare or major service change must have an analysis performed prior to implementation of the change to measure any adverse impacts on minority and low-income populations. UTA has embraced this process and has made equity an integral part of its planning process. Eight service and fare equity analyses were conducted during the reporting period and are included as [Attachment H](#).

TITLE VI POLICIES

FTA Circular 4702.1B requires the development of specific policies that help a transit provider identify when further actions must be taken when engaging in activities that may cause an adverse impact on populations protected by Title VI. Some of these policies must be brought to the public in order to allow comment and participation in the development of these policies and have them approved by the Authority's governing entity. UTA's policies have been developed and are official corporate policies. The official policy is included as [Attachment E](#) and include:

- 1- Major Service Change Policy
- 2- Disparate Impact Policy
- 3- Disproportionate Burden Policy

PUBLIC ENGAGEMENT

FTA requires that transit providers include a description of the public engagement process for setting the major service change policy, disparate impact policy, and disproportionate burden policy. UTA adopted a "Title VI Compliance Policy" in May 2013 to cover these requirements.

To solicit feedback from the public on the draft Title VI Compliance Policy, UTA created a notice that was advertised in local newspapers in the service area. The *Deseret News* and *Salt Lake Tribune* ran the notice on April 19 and 21, 2013. Comments were accepted through May 3, 2013. Although UTA tried to solicit feedback in local Spanish newspapers, there were no papers to run the notice in. The notice and draft policy was posted on UTA's website, www.rideuta.com, as well as on the Utah state government's website, www.utah.gov, under "Public Notices". At the time, the state website provides 35 language translation options. An email notification was sent out by the Salt Lake County Office of Diversity Affairs, which maintains an email list that goes to anyone interested in diversity issues. Additional targeted outreach was done, which included mailing a letter and the policy or sending an email to community organizations that work with minority or low-income populations, including the following agencies.

- Utah Coalition of La Raza
- Centro de la Familia
- Comunidades Unidas
- Centro Civico Mexicano
- The Utah Multicultural Affairs Commission
- National Tongan American Society
- Refugee and Immigration Center
- Horizonte Training Center
- Catholic Community Services
- International Rescue Committee
- Lutheran Social Service of Utah
- Rescue Mission of Salt Lake

One request was made for the policy to be translated into Vietnamese, which was done. The policy and notice were published by the requester in a local Vietnamese newsletter.

Comments could be submitted by email, mail, or phone. Four comments were received by email and one by phone. One comment expressed the belief that including minorities in the policy resulted in favoritism to them, to the detriment of Caucasian people. That person was sent a further explanation of the Title VI laws and how UTA must comply with them. The draft policy was modified to incorporate three of the comments.

MAJOR SERVICE CHANGE POLICY

A major service change policy defines which proposed changes would require a Title VI Service and Fare Equity Analysis. All equity analyses are presented to the UTA Board of Trustees for their consideration and are subsequently included herein as [Attachment J](#).

UTA's Major Service Change Policy states:

UTA will seek public input on the following types of changes. These changes will be considered "major changes" which require equity analysis in compliance with FTA's Title VI Circular.

- a. *The Addition of Service;*
- b. *A proposed service level reduction in miles, hours, or trips of thirty three percent (33%) or more of any route;*
- c. *The elimination of all set-vice during a time period (peak, midday, evening, Saturday, or Sunday);*
- d. *A proposed twenty-five (25%) or greater change in route alignment;*
- e. *A proposed fare change.*

DISPARATE IMPACT & DISPROPORTIONATE BURDEN POLICY

DISPARATE IMPACT DEFINITION

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin

DISPROPORTIONATE BURDEN DEFINITION

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

POLICY

The transit provider shall define and analyze adverse effects related to major changes in transit service. The adverse effect is measured by the change between the existing and proposed service levels that would be deemed significant.

- Title VI Circular

While performing a Title VI analysis on a proposed major change, UTA examines the potential adverse impact that may occur specific to minority and low income populations. UTA considers the degree of adverse impacts and analyzes those effects when planning any service or fare change. The circular specifies that a transit provider must establish a threshold for determining when adverse effects of service changes are borne disproportionately by minority and/or low income populations.

UTA's threshold for determining adverse impacts is outlined in policy as:

1. *UTA will measure the burdens of service and fare changes on minority riders to determine when minority riders are bearing a disparate impact from the change between the existing service or fare and the proposed service or fare.*
2. *UTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service or fare and the proposed service or fare.*
3. *A threshold of 5% will be used to determine disparate impact on minority populations and disproportionate burden on low-income populations. This 5% is based on the margin of error from the US Census data that UTA uses to determine the populations in the service area. This means that if the burden of the set-vice or fare change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, then the change will be considered either a disparate impact or a disproportionate burden.*

Finding a Disparate Impact

1. *At the conclusion of UTA's Analysis, if UTA finds a disparate impact on the basis of race, color, or national origin, UTA shall seek to modify the proposed changes in a way that will mitigate the adverse effects that are disproportionately borne by minorities. Modifications made to the proposed changes must be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts.*

2. *If UTA chooses not to alter the proposed services changes despite the potential disparate impact on minority populations, or if UTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service or fare change, UTA may implement the change only if:*
 - a. *UTA has substantial legitimate justification for the proposed change; and*
 - b. *UTA can show that there are no alternatives that would have a less disparate impact on the minority riders but would still accomplish the transit provider's legitimate program goals. In order to show this, UTA must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative*

Finding a Disproportionate Burden. If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. The provider should also describe alternatives available to low-income passengers affected by the service changes.

SYSTEM-WIDE SERVICE STANDARDS & SERVICE MONITORING

VEHICLE LOADS

STANDARD

UTA has set the following standard for vehicle loads:

For Bus Rapid Transit and peak only service, the median maximum load on a trip should be no greater than the vehicle seating capacity.

For other fixed-route bus services and commuter rail, the median maximum load on a trip is no greater than 150% of seating capacity.

Light rail has determined that average weekly loads on regularly scheduled trips should not exceed 100% of the seating capacity. If the loads regularly exceed capacity, then vehicles will be added to the consist until the maximum consist size is reached. Thereafter loads should not exceed 150% of seating capacity.

MONITORING

Utilizing the FTA’s definition of a minority route, UTA reviewed all of its current routes and the number of trips that exceeded the maximum load capacity as set forth in our standards. UTA had 1.18 million trips in calendar year 2018. 38% of the trips taken during this time period were on routes designated as a minority route. Of the 1,187,294 trips taken in 2018, only 8,047 of the trips exceeded the standard. The table below shows the number of trips above capacity during this period broken up into minority vs non-minority routes and the percentage they comprise.

	Minority Routes	Non-minority Route
Number of Trips above capacity	385	7,662
Percent of trips above capacity	4.8%	95.2%

FINDINGS

There were no findings of any disparate impacts on minority populations in UTA’s vehicle loads. Only 4.8% of all of the trips that were over capacity occurred on minority routes.

VEHICLE HEADWAYS

STANDARD

The average number of minutes between regional commuter trains should not exceed 60 minutes. The average number of minutes between light rail trains should not exceed 20 minutes.

UTA’s Service Design Guidelines identify four tiers or minimum levels of bus service. Route alignments and level of service are based on current or modeled productivity, the propensity of the alignment for transit use, as well as service design guidelines for route and stop spacing.

The transit propensity index is calculated based on a combination of factors - minority population density, transit supportive population density, job density, intersection density, higher-education student density, intersection density, and zero-car household density.

In brief, the tiers are as follows:

Tier	Minimum Level of Service	Minimum Transit Performance Index	Minimum Productivity
One	15 minute service weekdays & Sat, 30 minute service Sunday	300	20 passengers per service hour
Two	30 minute weekday, 60 minute Saturday	200	10 passengers per service hour
Three	60 minute weekday	100	10 passengers per hour 5 passengers per hour flex routes
Peak Only	No minimum headway	100	7 passengers per service mile

MONITORING

Below is a table depicting the average headway by minority and non-minority routes by rail and bus. The data is presented as the number of minutes between the arrival of one transit vehicle and the arrival of the next.

	Minority Routes	Non-minority Route	System Average
Bus Headway	23	27.6	25.9
Rail Headway	14.8	16	15.7

FINDINGS

There were no findings of any disparate impacts on minority populations in UTA’s headway monitoring. As evidenced in the table, the headways for routes serving in a minority area have more frequent headways than non-minority routes.



ON-TIME PERFORMANCE

STANDARD

For commuter rail service, on-time is defined as departing stations 0 seconds early and less than 5 minutes late. The on-time standard is 88% on-time for all departures. UTA continuously monitors on-time performance and conducts analysis to determine root causes of non-standard performance then makes adjustments where feasible.

For light rail service, on-time is defined as departing stations 0 seconds early and less than 5 minutes late. The on-time standard is 88% on-time for all departures. Light rail service is continually monitored and schedule adjustments or other corrective action taken annually at a minimum.

For fixed-route bus, on-time is defined as departing time point crossings 0 seconds early and less than 5 minutes late for regular fixed-route and 0 seconds early and less than 15 minutes late for flex routes. UTA will evaluate whether adjustments are necessary when:

- The on-time performance for the whole route is consistently below 88%
- Running time adjustments to individual trips are so large that they disrupt the cycle time of the whole route

For paratransit, on-time is defined as at least 90% of customers picked up within 10 minutes before to 20 minutes after the stated pick-up time and 90% of customers dropped off within 30 minutes of any stated appointment time.

MONITORING

UTA conducted monitoring for the period of 2018 to determine if there are any disparate impacts on minority routes' on-time reliability. Please note that UTA only has one FrontRunner line, which is its commuter rail. This line is not a minority route so there is no on-time reliability data for commuter rail minority lines.

	Minority Routes	Non-minority Route	System Average
Bus Reliability	92.3%	87.7%	89.3%
TRAX Reliability	94.6%	93.9%	94%
FrontRunner Reliability	N/A	85.9%	85.9%

FINDINGS

There were no findings of any disparate impacts on minority populations in UTA's on-time performance. As is shown in the table, minority routes are, on average, more consistently on time than non-minority routes.

SERVICE AVAILABILITY

STANDARD

For commuter rail, stations are preferably situated 7-8 miles apart, dependent on land use and travel time considerations.

For light rail, stations should be approximately 1 mile apart in suburban areas and 1/2 mile apart in urban areas. Light rail service operated as a street car should have approximately 1/4 mile stop spacing. Service availability for fixed bus is based on route and stop spacing.

Recommended route spacing for fixed and flex routes in the UTA system is as follows:

Environment	Route Spacing
Central Business District	1/8 mile to 1/4 mile
Urban	1/4 mile to 1/2 mile
Suburban	1/2 mile to 1 mile
Rural	As needed based on surrounding development and activity

Recommended stop spacing for fixed and flex routes in the UTA system is as follows:

Environment	Stop Spacing
Central Business District	400 – 800 feet
Urban	500 – 1,000 feet
Suburban	600 – 1,200 feet
Rural	800 or as needed based on surrounding development & activities

MONITORING

In evaluating the availability of transit services, UTA reviewed the population within its taxing districts and compared it to the populations that fall within a walk access to any transit stop or station. UTA has defined its service area as everything that falls within our taxing districts. The areas with walk access are those census blocks that fall within an area that is within a certain distance, according to the actual road access of the area, from a transit stop or station. The distances from stop or station are:

- 1/4 mile from a bus stop
- 1/2 mile from a light rail or bus rapid transit station
- 3 miles from a commuter rail station



The table below shows the number of people within the service area, the number of people with walk access, and the number of minorities within each group.

	Total Population	Minority Population	Percent Minority
Service Area Population	2,310,052	511,161	22.1%
Population With Walk Access	1,531,569	391,043	25.5%
Percent of Population With Walk Access	66.3%	76.5%	

According to the data presented, the overall population with walk access has 3.4% more minorities than the service area’s population. Additionally, 76.5% of all of the minority population in our service area fall within the walk access compared to 66.3% of the service area at large.

FINDINGS

There were no findings of any disparate impacts on minority populations in UTA’s service availability. Overall, minorities had a greater amount of walk access than non-minority populations.

DISTRIBUTION OF AMENITIES

STANDARD

UTA is responsible for establishing a policy for how transit amenities are added to the system and ensuring the equitable distribution of amenities throughout the service area. “Transit amenities” refer to items of comfort, convenience, and safety that are available to the general riding public. They include, but are not limited to items such as seating, shelters, canopies, provisional information, escalators, elevators, and waste receptacles. Additionally, UTA is making efforts to upgrade existing stops to the Americans with Disabilities Act (ADA) standards.

In accordance with this requirement, UTA has developed a master plan outlining all of the criteria involved in prioritizing which stops will receive improvements, what improvements are warranted based on use, and outlines construction specs for improvements. The Bus Stop Master Plan outlines and encourages partnerships with local government and property owners to improve the accessibility, comfort, and convenience of the riding public.

The creation of this document required an extensive inventory of all of UTA’s 6,055 bus stops, standardizing the specifications by which all stops would be improved and updating UTA’s decision making matrix for prioritizing what amenities will be added to a stop. An updated decision making matrix is included on the following page.

Category	1 Point	2 Points	3 Points	4 Points	5 Points
Non-ADA Compliant*	-	-	-	-	Yes
Total Stop Activity (TSA) – Average Daily Weekday**	1 to 19	20 to 39	40 to 59	60 to 79	80 +
Transfer Point***					
<i>Equal to or Greater than 30 min. freq.</i>	1 Route	2 Routes	3 Routes	4 Routes	5+ Routes
<i>Less than 29 the min. freq.</i>	1 Route	2 Routes	3 Routes	4 Routes	5+ Routes
Serves Title VI Community	Title VI Route	Minority OR Low Income	Minority AND Low Income	2 x Minority + Low Income	2 x Minority + 2x Low Income
Safety					
<i>Intersection</i>	1 of 5 Elements	2 of 5 Elements	3 of 5 Elements	4 of 5 Elements	5 of 5 Elements
<i>Parking Allowed</i>					
<i>Obstacle(s) Present</i>					
<i>No lighting Present</i>					
<i>Sidewalk Not Level</i>					

* Non-ADA compliant bus stop locations automatically receive five (5) points

** TSA Data is average weekday ridership taken from the last eight change day periods

***One (1) additional point is assessed each route at the transfer point with 30 minute or less frequency

As is shown above, there are additional points given in prioritizing amenities that would serve a Title VI community.

MONITORING

UTA presently has 6,055 bus stops in its system. Of those stops, 2,197 of them are in an area where the percent of minorities in the surrounding population exceed the system average of 22.1%. Surrounding population is determined by applying a ¼ mile walk access radius and incorporating any census blocks that are overlapped. Most recently, 2010-2016 ACS data was used in the formulation of these figures.

Since the number of stops within the system that serve a minority population above the system average is 36.3% of all stops, this figure is used as the point of reference in determining any potential disparity in amenity distribution.

	Percent of Stops on Minority Lines with this amenity	Percent of all stops with this amenity
Shelter	37.6%	10%
Seating	35.8%	20.3%
Trash Receptacle	38.1%	13.8%

Additional stations are available on UTA’s TRAX lines, FrontRunner commuter rail and Bus Rapid Transit lines. The amenity distribution are uniformly applied at these stations as all of them have shelters, seating, electronic signage, schedules, and trash receptacles. For informational purposes, below is a representation of the number of stations that are in minority areas.

	Number of Stations	Minority Stations	Percent Minority
FrontRunner	15	8	53.3%
Blue Line	24	15	62.5%
Red Line	25	18	72%
Green Line	18	14	77.8%
S-Line	7	5	71.4%
UVX (BRT)	18	9	50%

FINDINGS

There were no findings of any disparate impacts on minority populations in UTA’s amenity distribution.

VEHICLE ASSIGNMENT

STANDARD

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider’s system.
 - Title VI Circular

The guidelines that UTA uses in assigning vehicles to routes are as follows. The quantity of buses in each Business Unit is determined by the demand, which is the peak pull-out for the calendar year. The Planning Department from each Business Unit generates information regarding routes and schedules that is cut into runs and blocks for Operators to work. This information is shared with the respective Business Units’ Maintenance Departments. Buses are assigned within a service area according to the characteristics of the service, such as canyon, commuter express, shuttle or regular transit bus service, passenger loads, and topography of the service area. Specially equipped canyon buses have different specifications than buses that operate in regular transit service in the valley.

Each Maintenance Department determines vehicle assignment based on criteria stipulated by the planners and operational characteristics as to what type of equipment is required for each route or schedule. The vehicle type that can accommodate the runs and blocks is entered into the Fleet Control Sign-out database software program. Also, the status of buses that are out for repair, body work, or temporarily out of service is updated in the database. Vehicles are assigned on a daily basis through a Sign-out Sheet. All-day blocks (runs that are out around 16 hours or more) are typically assigned the same type of bus each day. Any



remaining buses are assigned to tripped blocks (buses sent out during overloads or blocks that are less than 8 hours in duration). Once the sign-out sheet is generated, the sign-out is sent to Operations Dispatch for Operator assignment.

MONITORING

UTA has developed a report that produces the average age of the vehicles used on any given route. The specific timeframe used for this monitoring was for the time period of June, July and August of 2018. All routes were analyzed and the average of the entire system was taken for minority routes and non-minority routes. During this time period, the minority routes' vehicles were .6 years newer than non-minority route trips and 2 years newer when looking at the blocks they served. See the table below for the figures.

	<u>Trips</u>		<u>Blocks</u>	
	Non-Minority	Minority	Non-Minority	Minority
Average Age in Years	7.3	6.7	9	7

UTA's rail and BRT system have a designated vehicle that was purchased at the same time and assigned specifically to a route. All vehicles on each route are the same age and cannot be distributed to other routes due to specification and branding.

FINDINGS

There were no findings of disparate impact on minority populations in UTA's vehicle assignment

DEMOGRAPHIC DATA REPORT

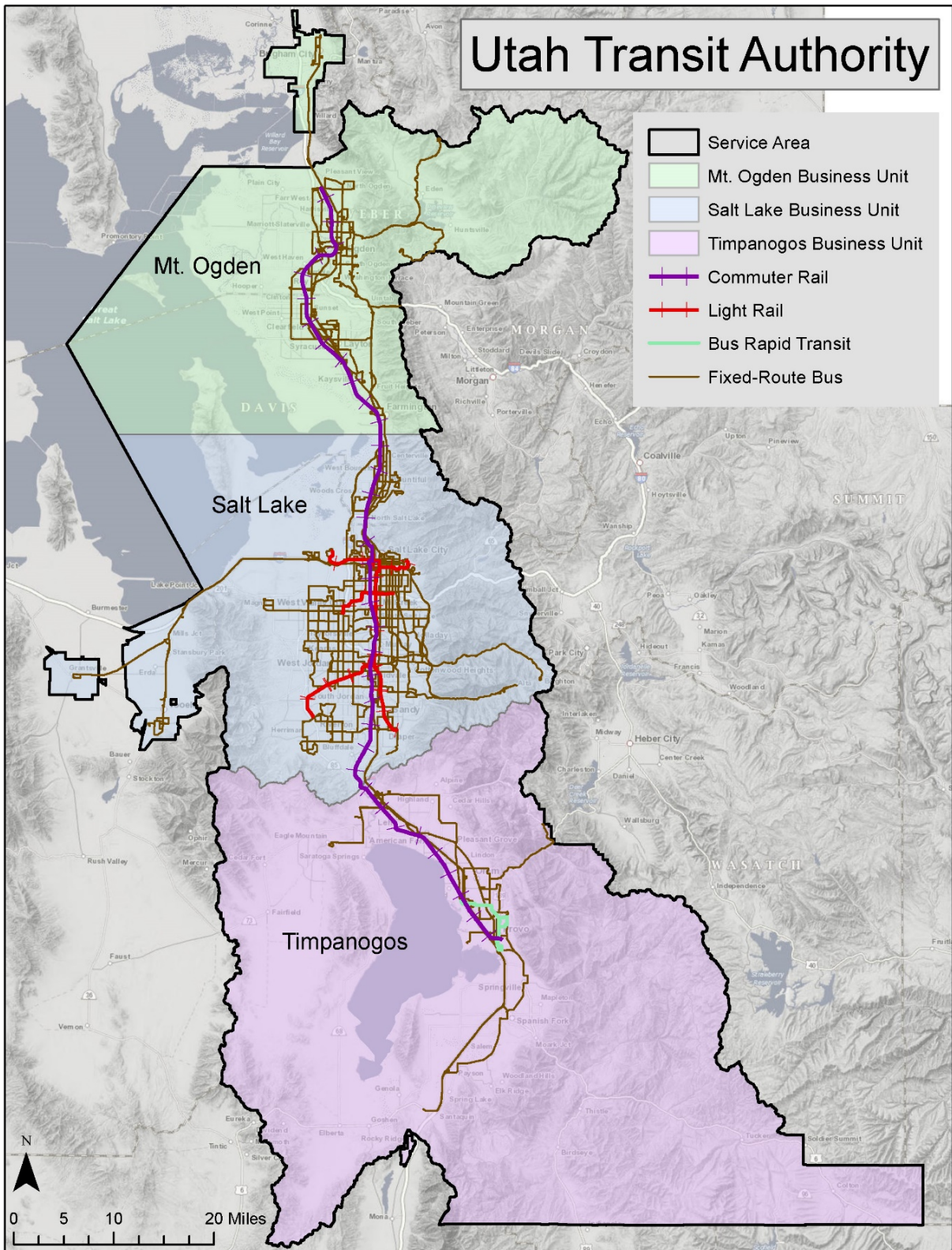
The FTA requires fixed route providers of public transportation to collect information on the race, color, national origin, English proficiency, language spoken at home, household income, and travel patterns of their riders using customer surveys. UTA must then use this information to develop maps and a demographic profile comparing minority riders and non-minority riders, trips taken by minority and non-minority riders, and the demographics of fare usage by fare type amongst minority and low-income riders.

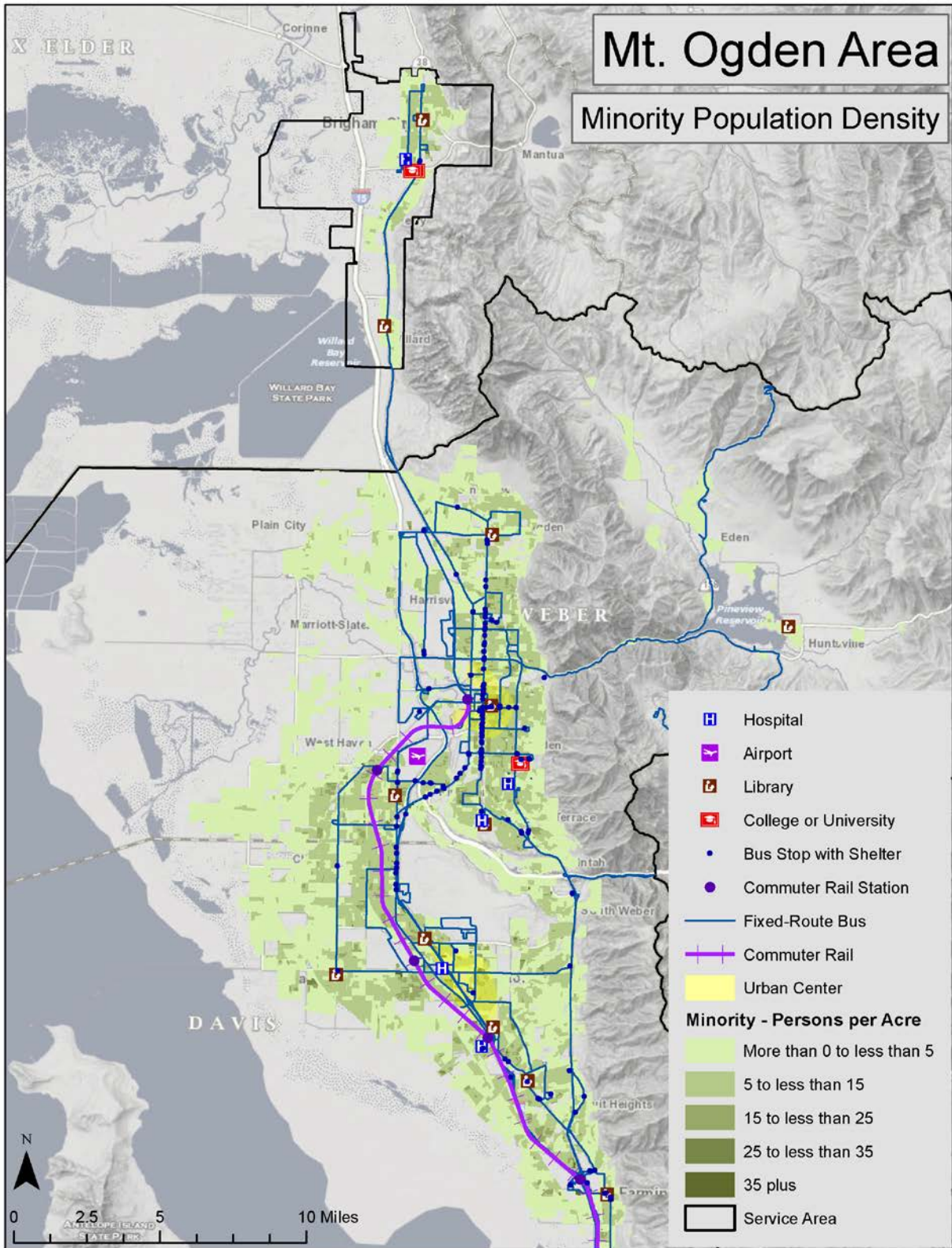
CURRENT SERVICE AND SERVICE AREA

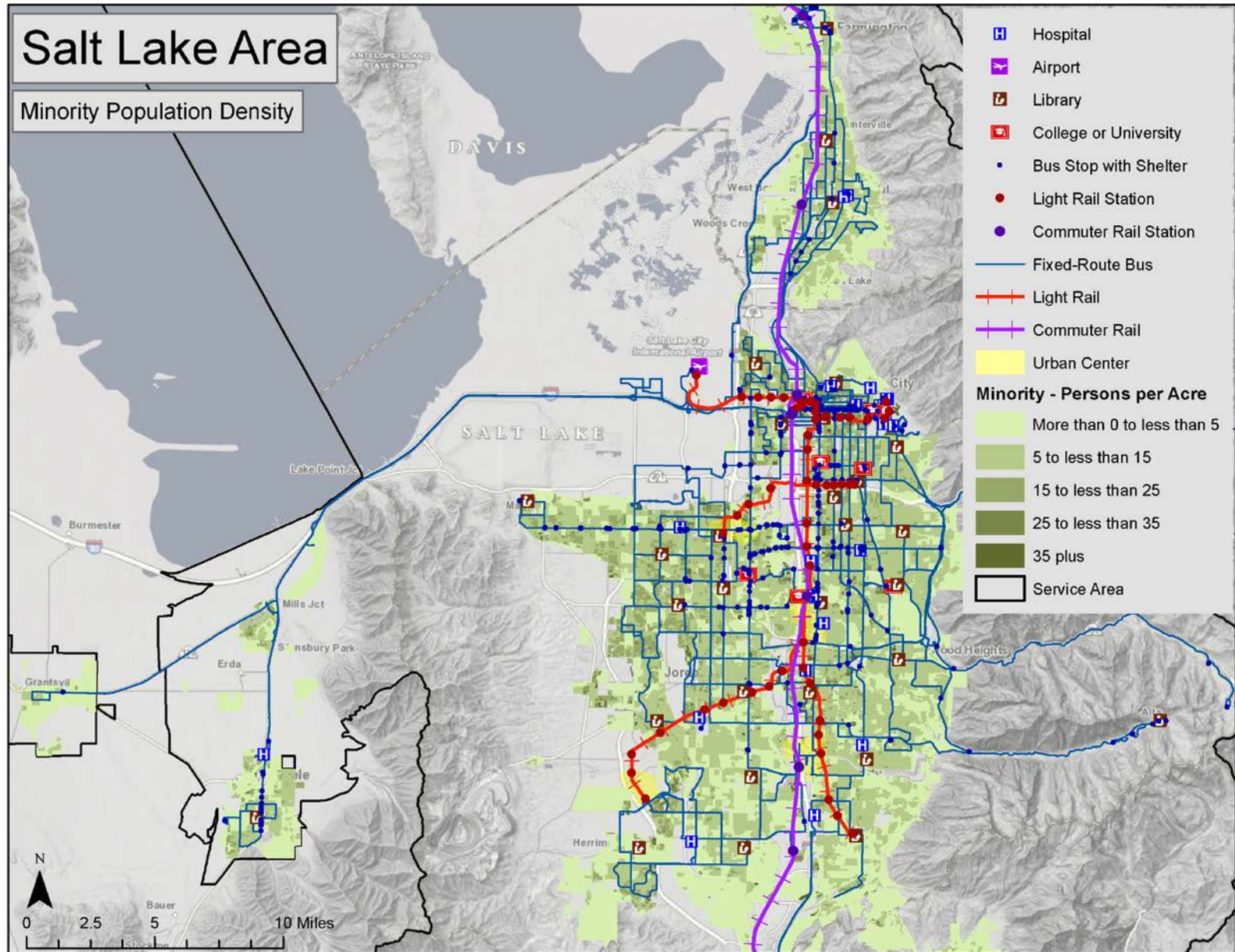
In order to determine the extent to which members of minority groups are beneficiaries of the programs UTA offers, UTA maintains maps using Geographic Information System (GIS) technology. GIS data is used to evaluate proposed major changes and measure the impacts any changes may have on the population we try to serve, with special emphasis on monitoring unintended impacts on populations protected under Title VI. The following maps were prepared using demographic data from American Community Survey (ACS) 2012-2016 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups. This was done in order to use the smallest geographic area possible for the analysis. The distribution was dictated by population ratios from 2010 Census Data. This data is updated annually. The UTA service area is geographically large and difficult to present in a single map. Subsequently, the maps are broken up into the three business units in order to provide a more detailed view of each area. For reference, the first map shows the entire service area and each business unit's area. The remaining maps are broken up into service area.

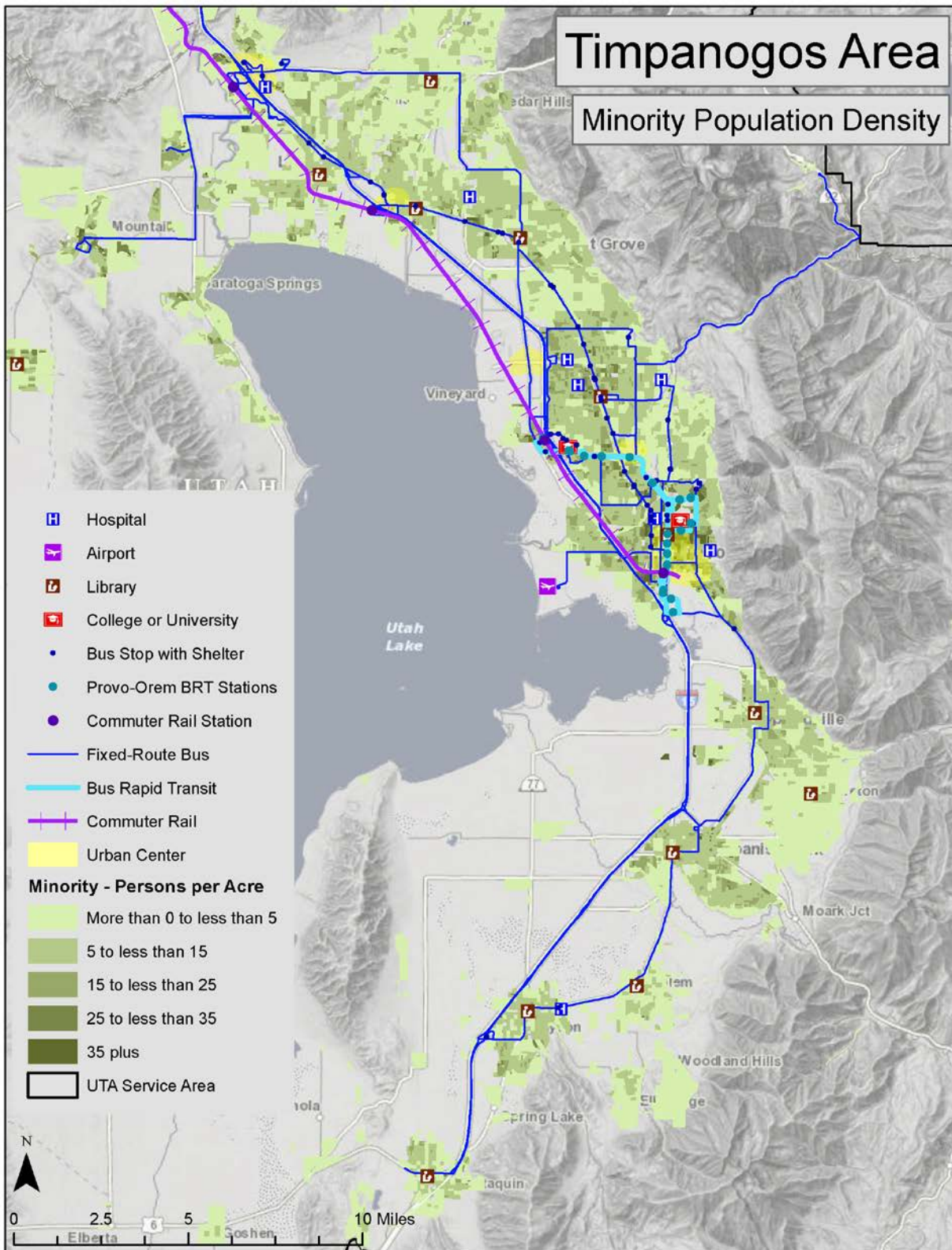
The maps included in this section include.

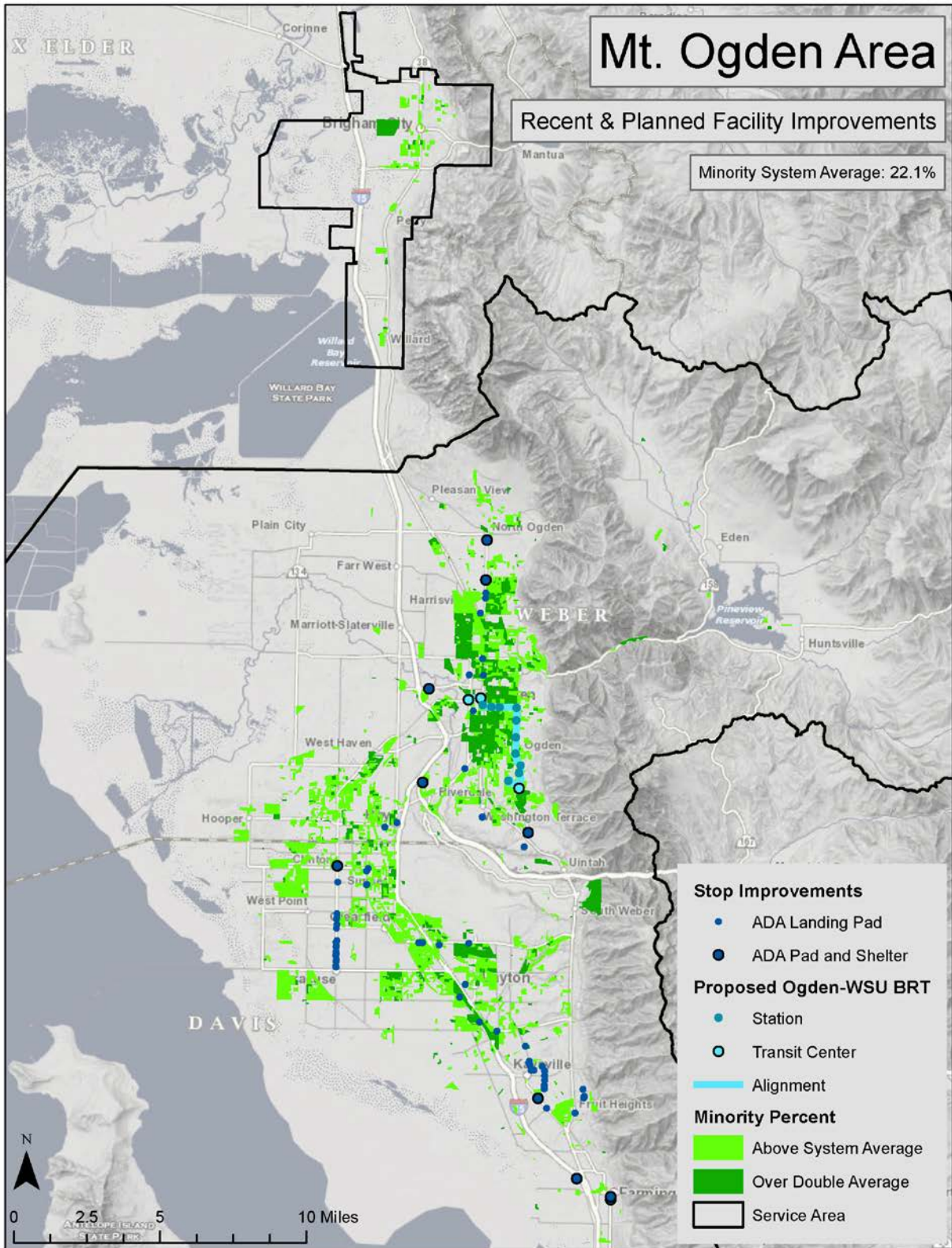
1. Overview of UTA's service area and available service
2. Mt. Ogden Minority Population Density
3. Salt Lake Minority Population Density
4. Mt. Timpanogos Minority Population Density
5. Mt. Ogden Facility Improvements
6. Salt Lake Facility Improvements
7. Mt. Timpanogos Facility Improvements
8. Mt. Ogden Minority Concentrations
9. Salt Lake Minority Concentrations
10. Mt. Timpanogos Minority Concentrations
11. Mt. Ogden Low Income & Poverty
12. Salt Lake Low Income & Poverty
13. Mt. Timpanogos Low Income & Poverty

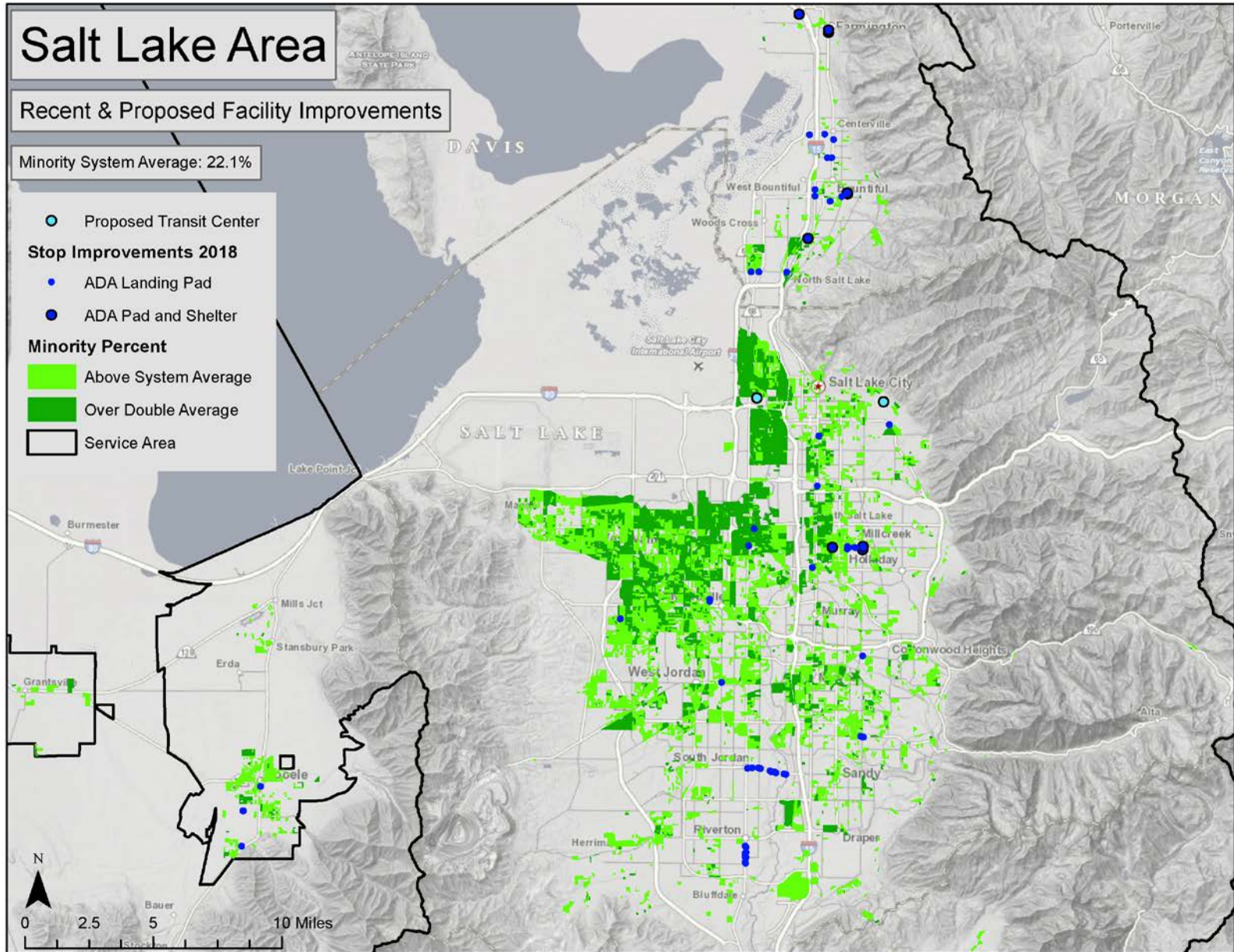


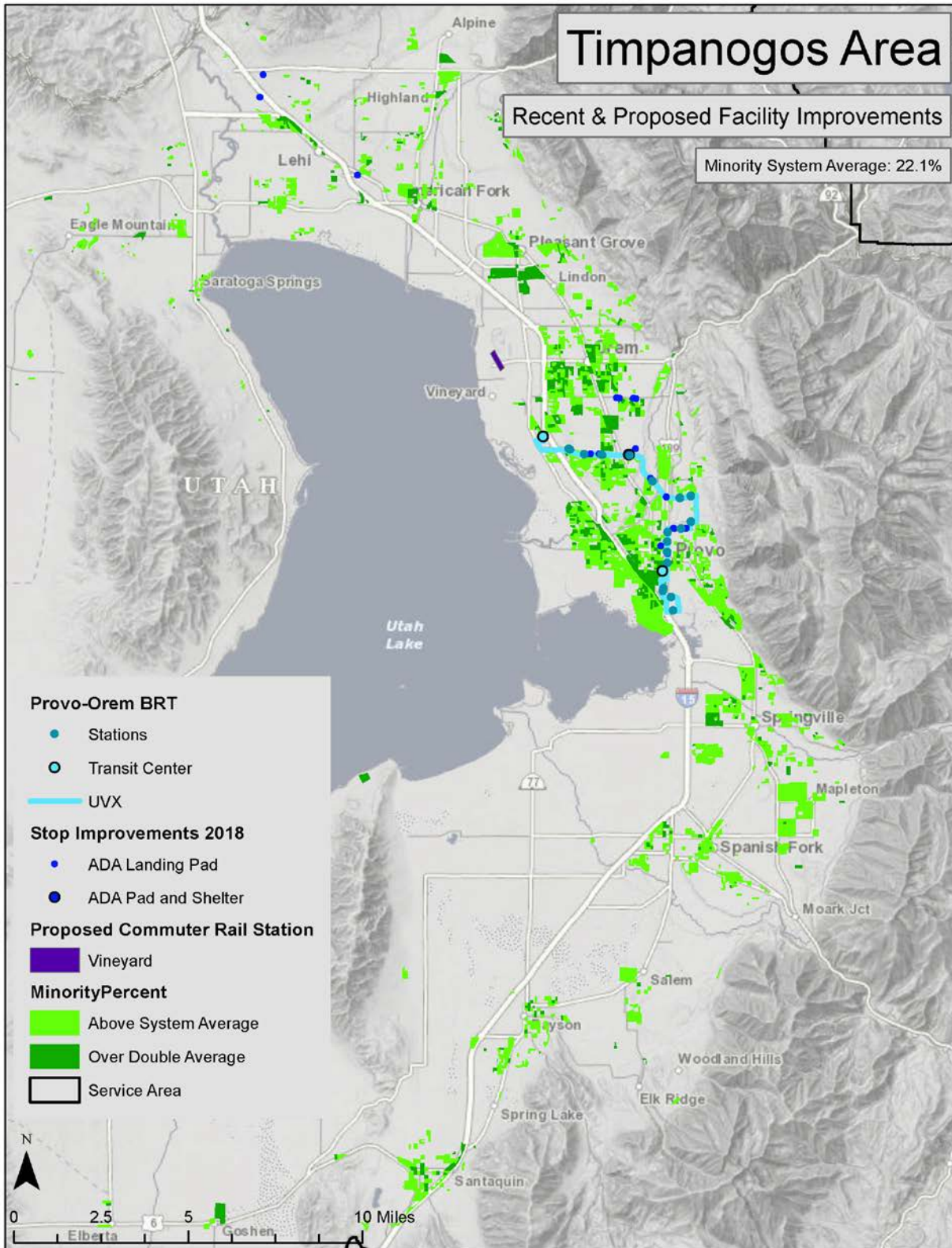


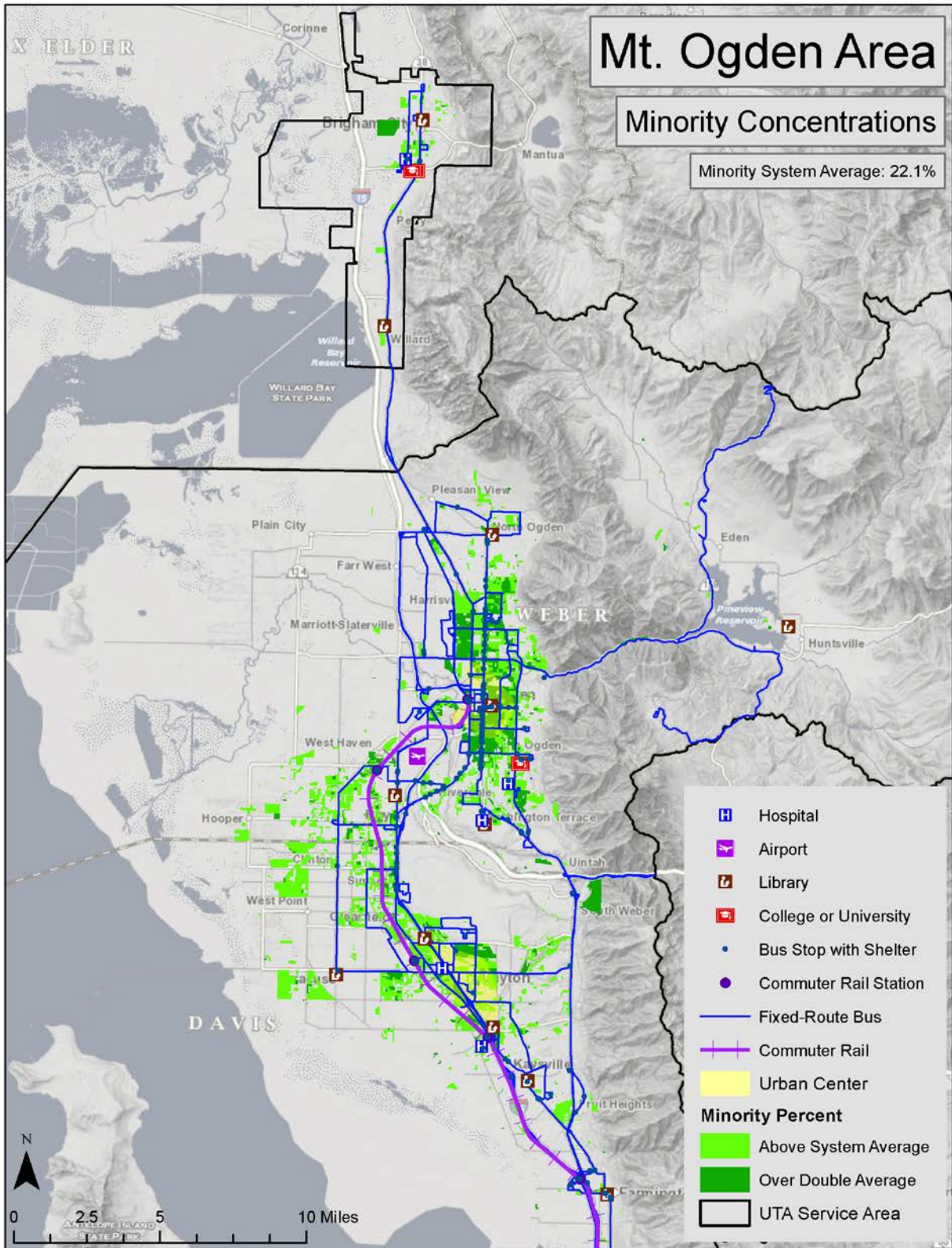


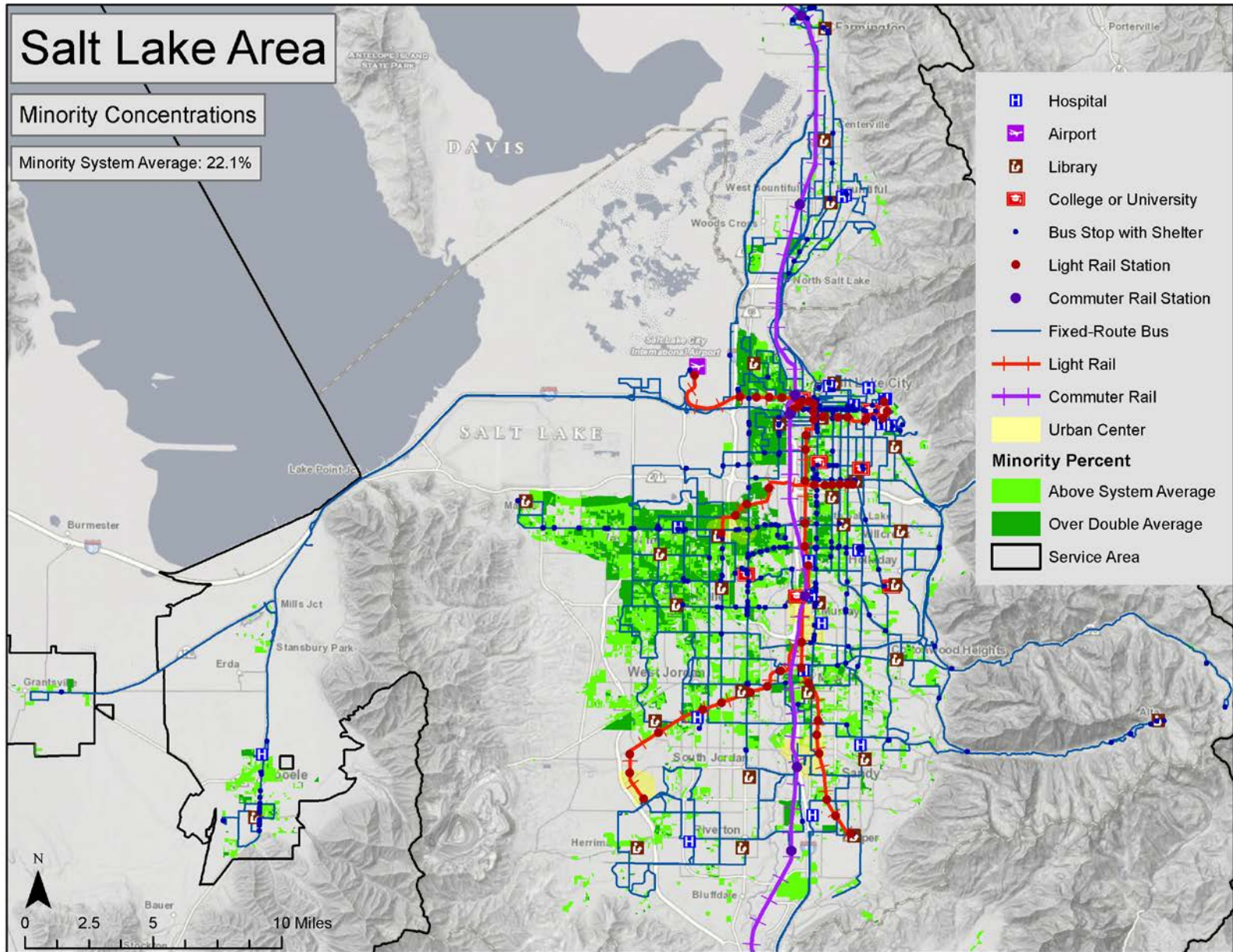


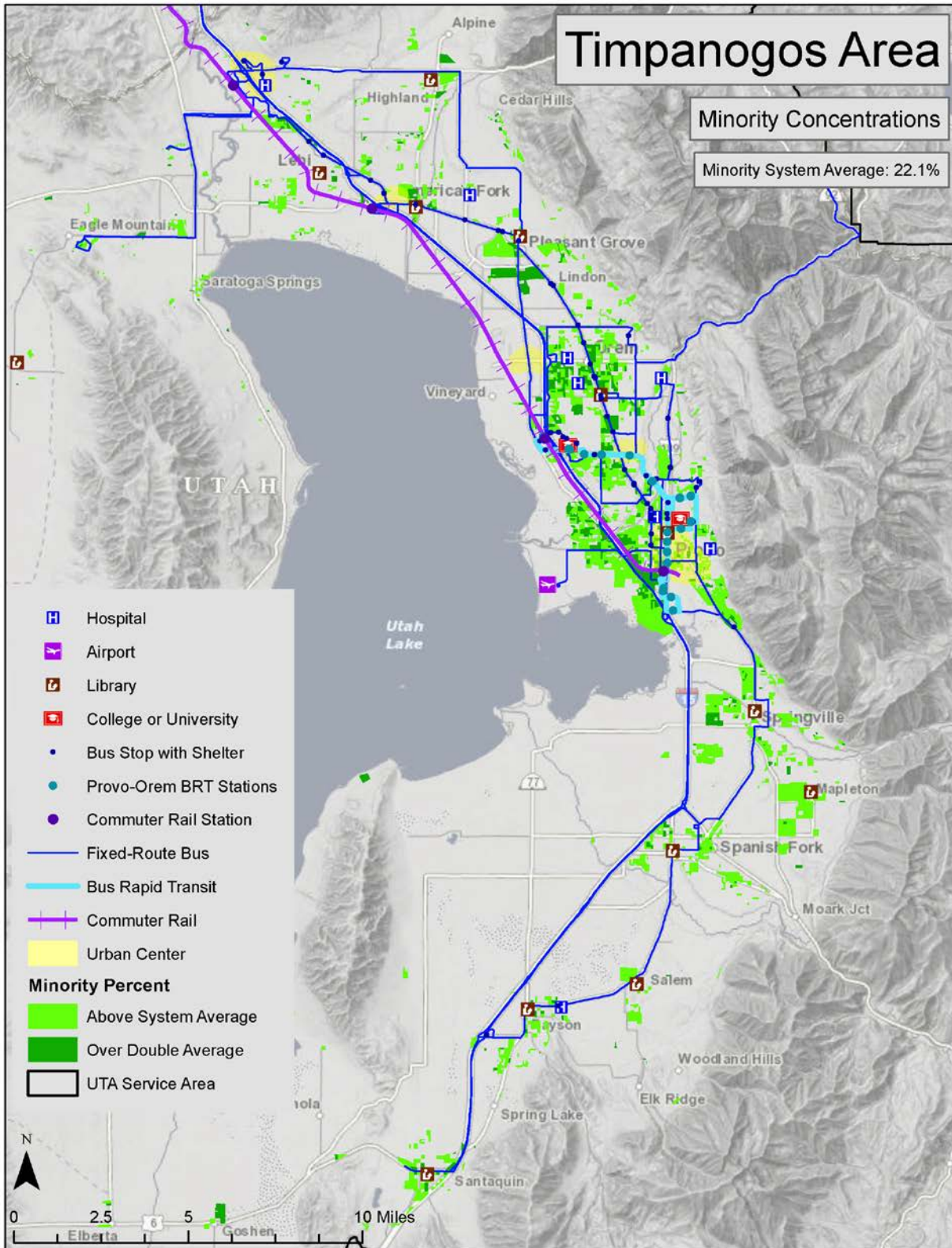


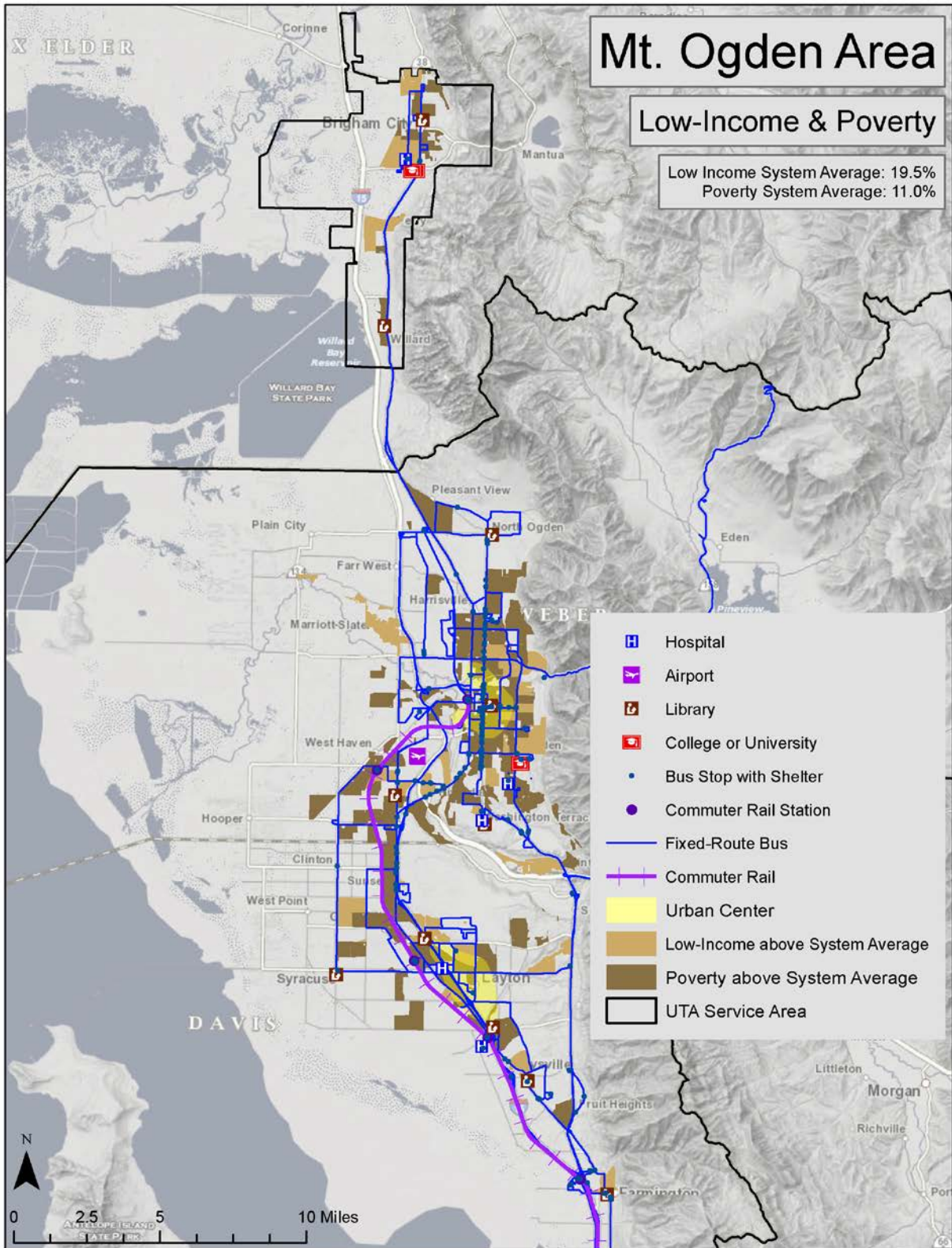


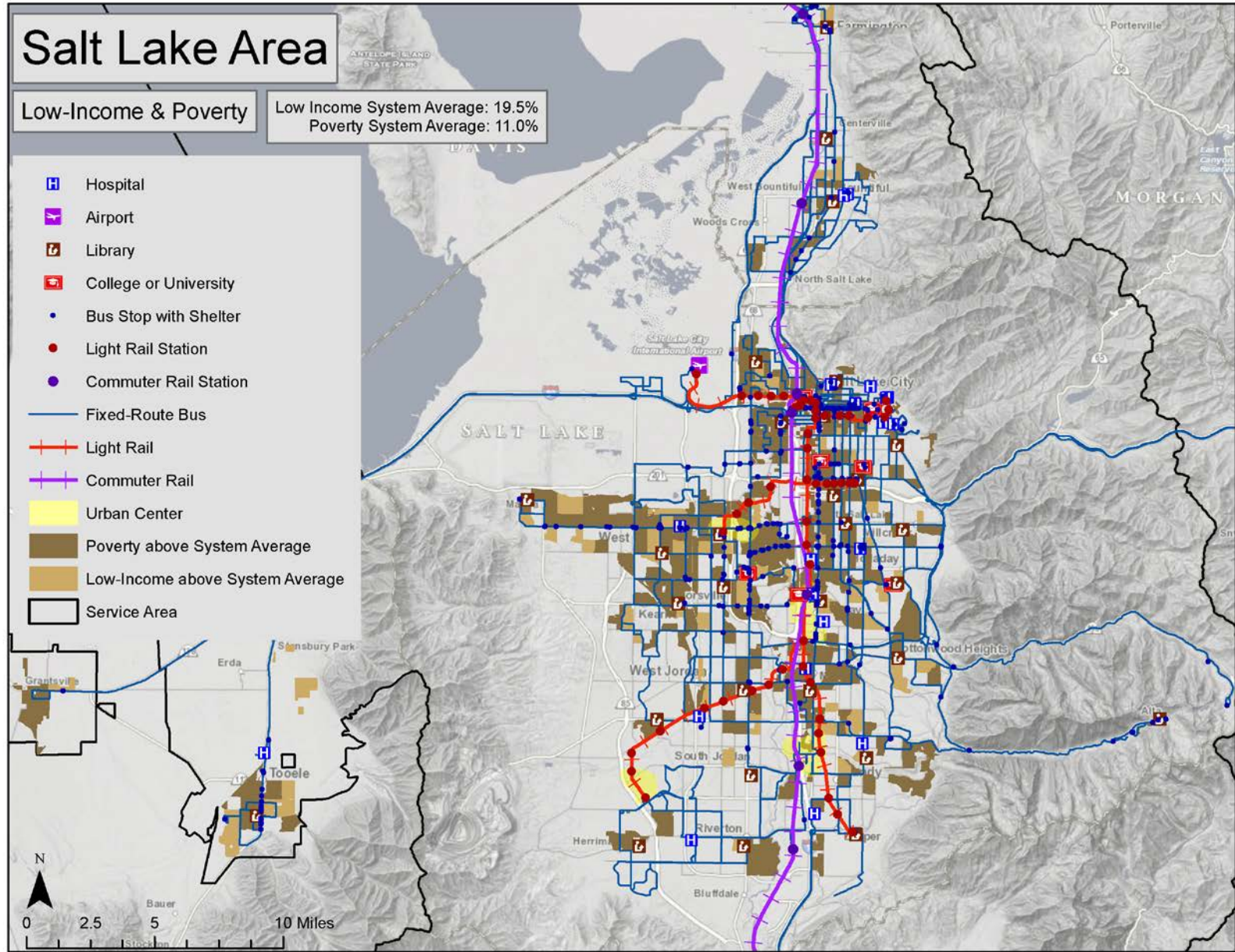


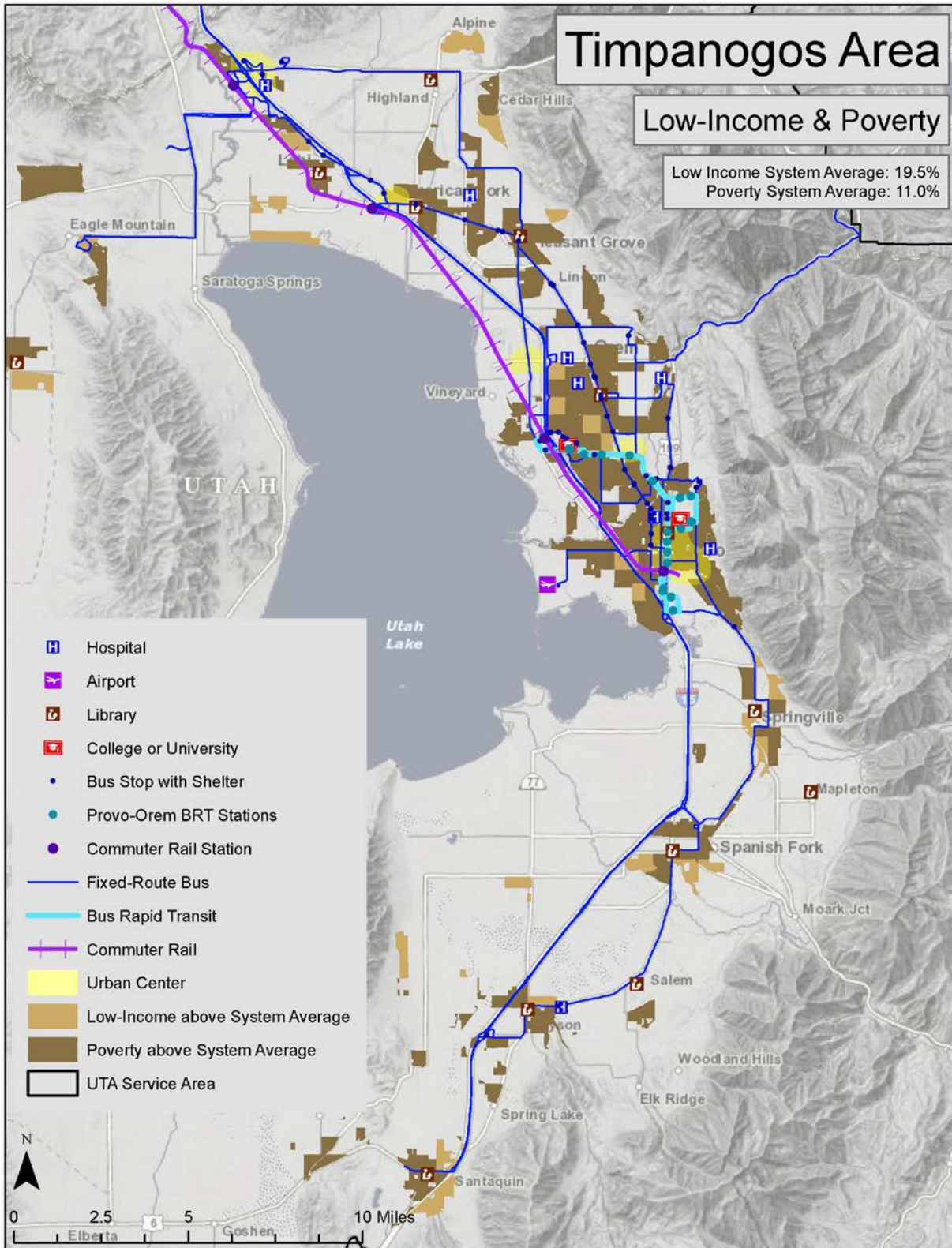












RIDERSHIP CHARACTERISTICS AND DEMOGRAPHICS

In order to develop a demographic profile of the members of the community using transit services, UTA conducted an on board survey of its riders between October 2015 and February 2016. During this survey period, 16,408 usable surveys were collected. The study relied on a tablet-based questionnaire. Staff conducted surveys directly with riders on UTA transit vehicles. The data collected from this effort were weighted and expanded using Automatic Passenger Counter (APC) data maintained by UTA. A copy of the survey is included as [Attachment H](#). The data from the survey was used to create the following charts and figures.

Surveying was conducted on Mondays through Thursdays and focused on trips occurring between 6:30 a.m. and 9:00 p.m. The survey staff rode trips in both directions of travel. The survey sampling plan was designed to obtain surveys from 9% of average weekday boardings by route/line, time period, and direction, roughly proportional to actual ridership.

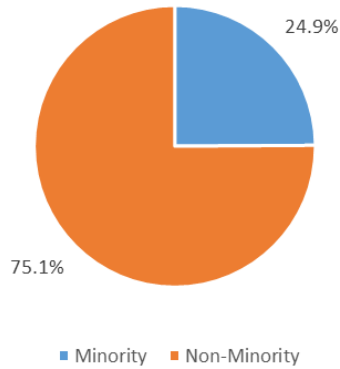
The table below shows ridership and both targeted and achieved sampling for UTA buses and each rail line. Surveying on all rail lines and the UTA bus system as a whole exceeded targets. Overall, greater than 12% of UTA ridership was surveyed.

Route	Average Weekday Ridership (Oct. 1 – Nov. 30, 2014)	Sampling Goal	Usable Surveys	% of Target
TRAX- Red	24,334	2,190	2,793	127%
TRAX- Blue	21,969	1,977	2,186	111%
TRAX- Green	14,081	1,267	1,717	135%
Frontrunner	15,819	1,424	1,699	119%
S-Line	1,074	97	123	127%
Bus	68,468	6,162	7,890	128%
Total	145,746	13,117	16,408	125%

Throughout this section, “Low Income” refers to any household making under \$30k per year. Moderate income is any household reporting an annual income between \$30k and \$75k. Any household reporting income over \$75k a year is considered high income.

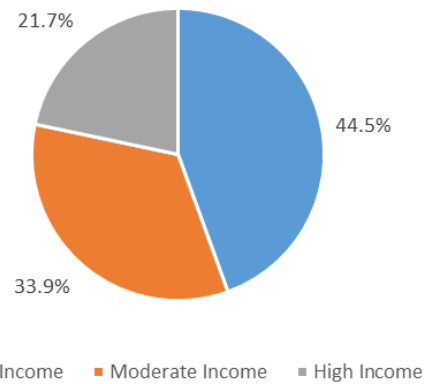
DEMOGRAPHIC OVERVIEW

RACE/ETHNICITY OF RIDERS



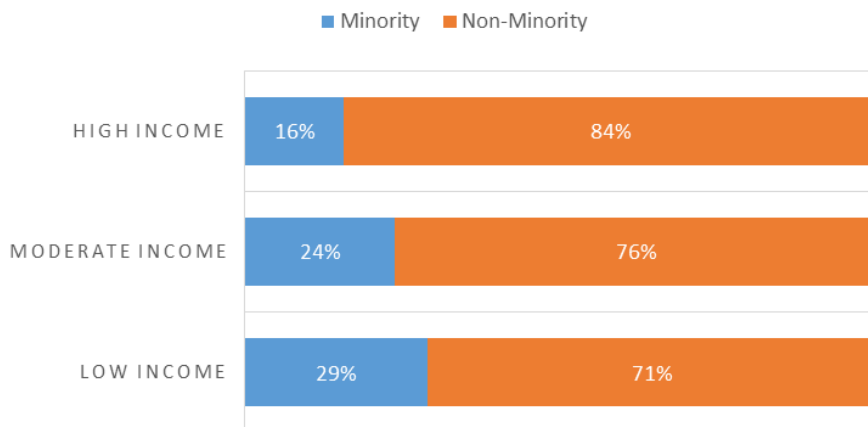
Of the people surveyed, 24.9% of them identified as a minority per the FTA's definition. This is 3% higher than population of UTA's service area.

INCOME OF RIDERS



Low income (less than \$30k per year) comprise 44.5% of those surveyed. When comparing this to 2015 ACS poverty data, this is 24.1% more than the population of UTA's service area.

INCOME AND RACE/ETHNICITY

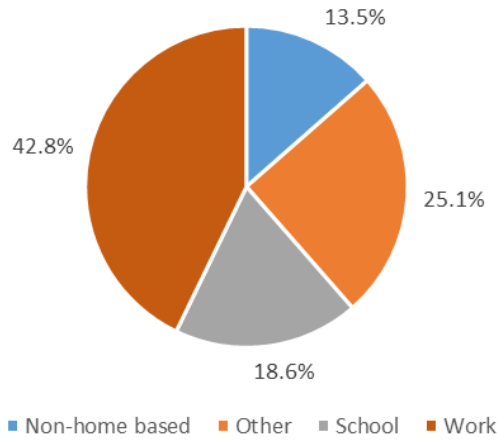


The table to the left shows the racial/ethnic breakdown within the three income groups. Below is a breakdown of the 13,306 respondents who answered both the income and race/ethnicity question broke up into the three groups.

Low Income: 5,915 (44%)
 Moderate: 4,509 (34%)
 High: 2,882 (22%)

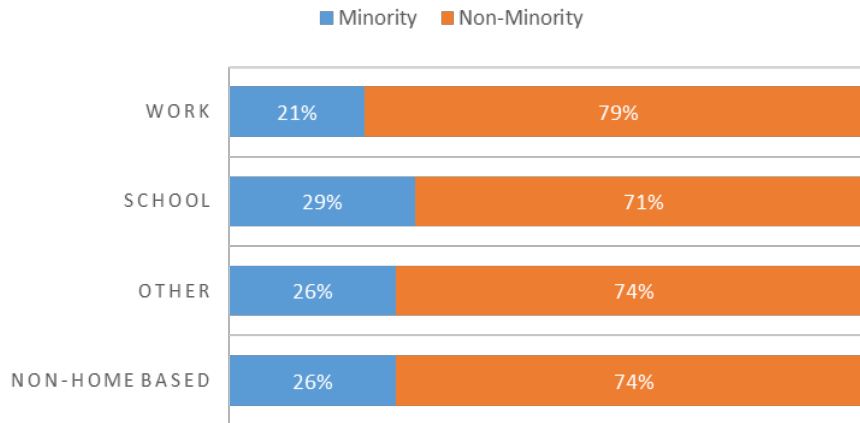
TRAVEL PATTERNS

OVERALL TRIP PURPOSE

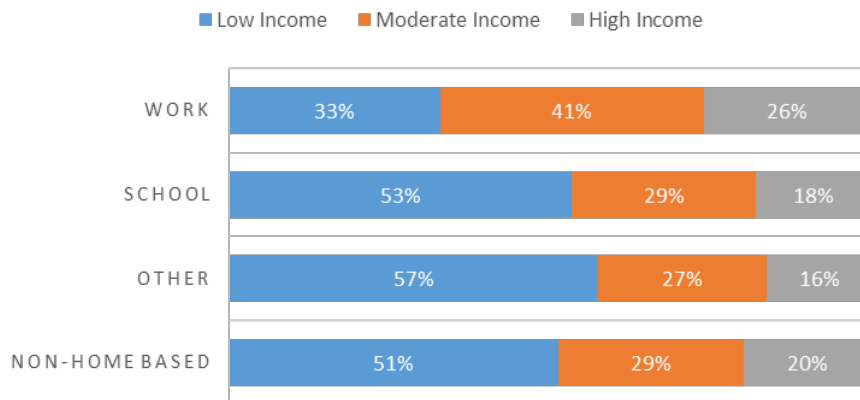


FTA requires that transit providers include information regarding the trips taken by transit provider's ridership including the demographic profile comparing minority riders and non-minority riders. The following three tables show the reported purpose for the trips taken.

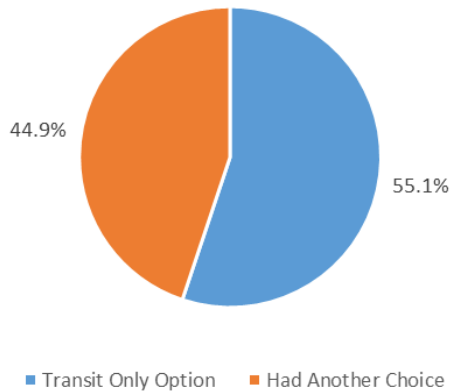
TRIP PURPOSE RACE/ETHNICITY



TRIP PURPOSE BY INCOME



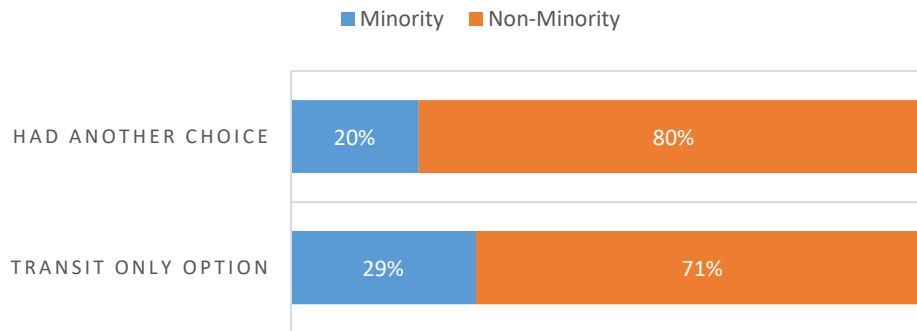
OVERALL CHOICE VS CAPTIVE



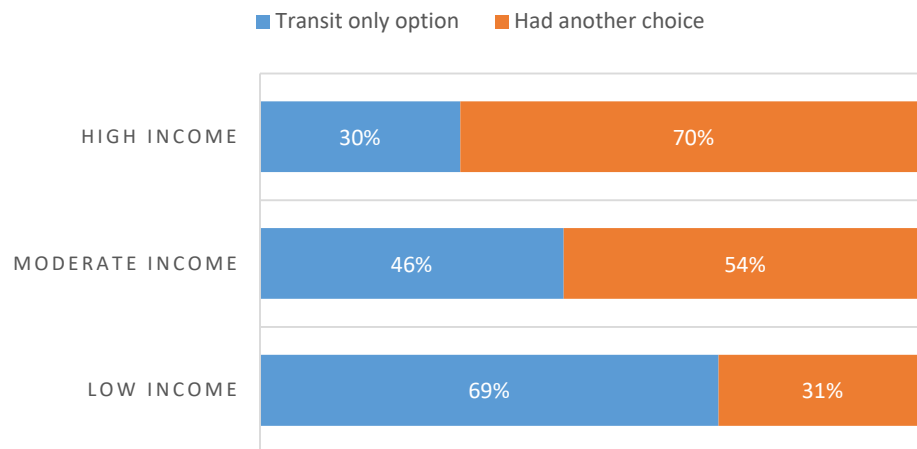
UTA reviewed the demographics and income level of its riders' need to use transit services. Riders were asked if they used transit because they had no other option or if they were able to utilize other means to get around, but choose to use transit.

As is evident in the charts below, minorities comprise 9% more of the captive riders than those riding by choice. Additionally, low income riders are captive at a rate of more than double their high income counterparts.

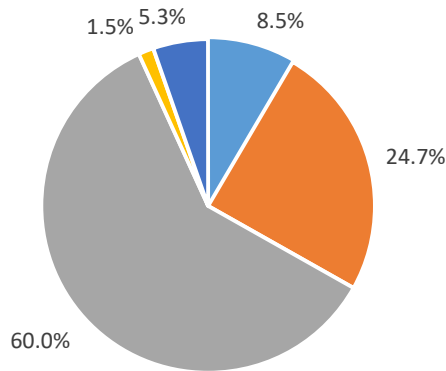
CHOICE VS CAPTIVE



CHOICE VS CAPTIVE



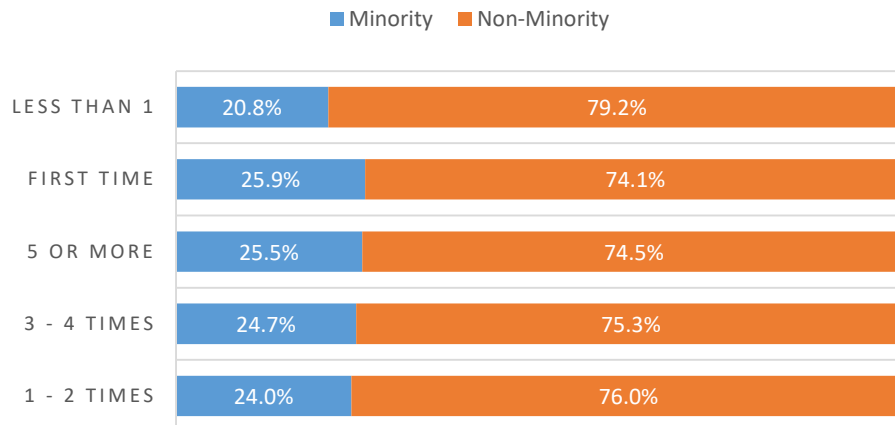
WEEKLY TRANSIT USE



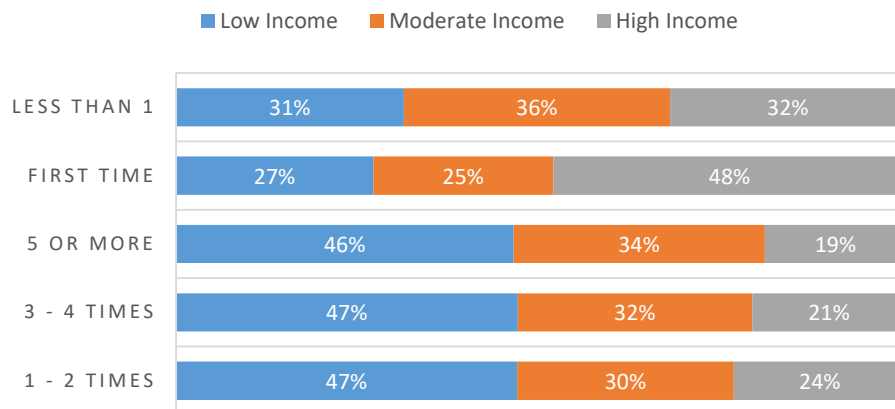
The three charts on this page show the frequency by which the surveyed riders utilize transit services. The majority of riders stated that they used the system five or more times per week

■ 1 - 2 times ■ 3 - 4 times ■ 5 or more ■ First Time ■ Less than 1

TRANSIT USE BY RACE/ETHNICITY

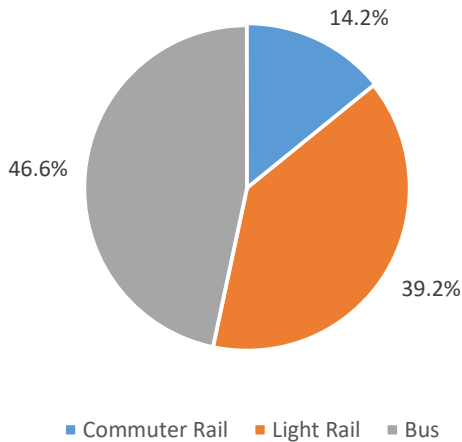


TRANSIT USE BY INCOME LEVEL



DEMOGRAPHICS BY MODE

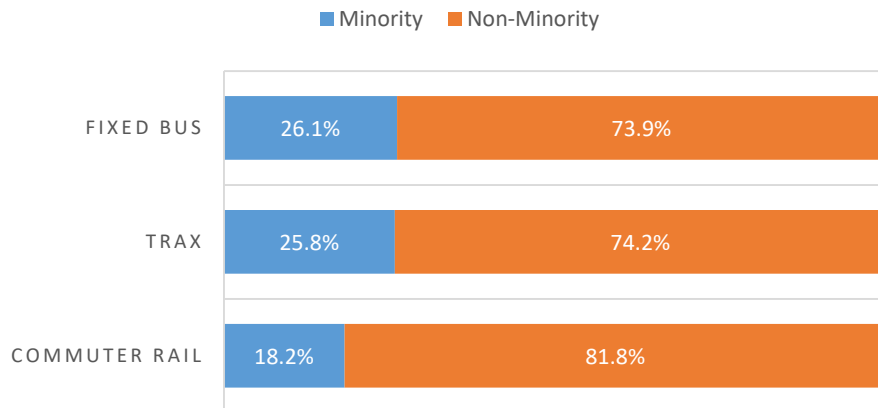
OVERALL BY MODE



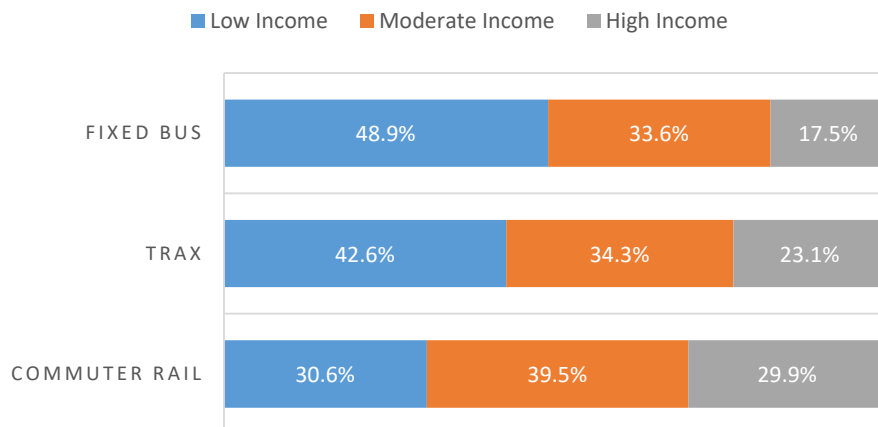
Depicted in these three charts are a breakdown of those surveyed that utilize UTA’s three primary modes of transportation.

Please note that the chart, “Ridership by Mode”, counts the number of trips on a mode, but some customers reported trips on multiple modes on the same survey.

RACE/ETHNICITY BY MODE



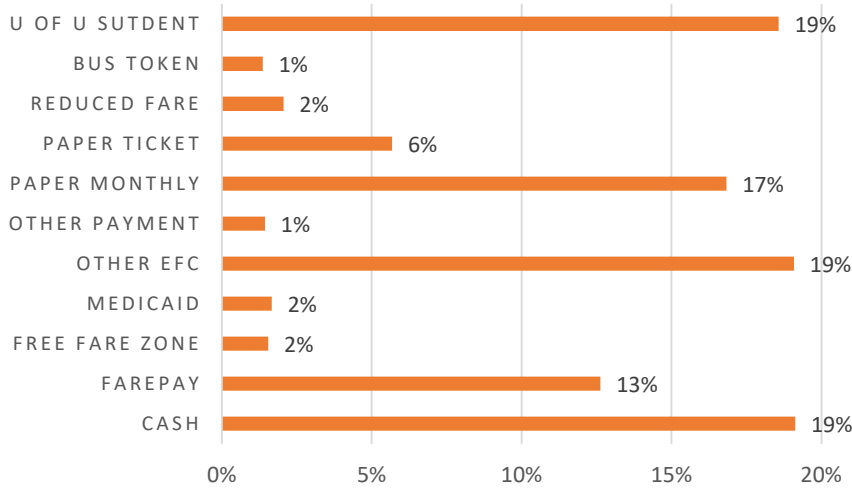
INCOME LEVEL BY MODE





FARE USAGE

FARE PAYMENT TYPE USAGE

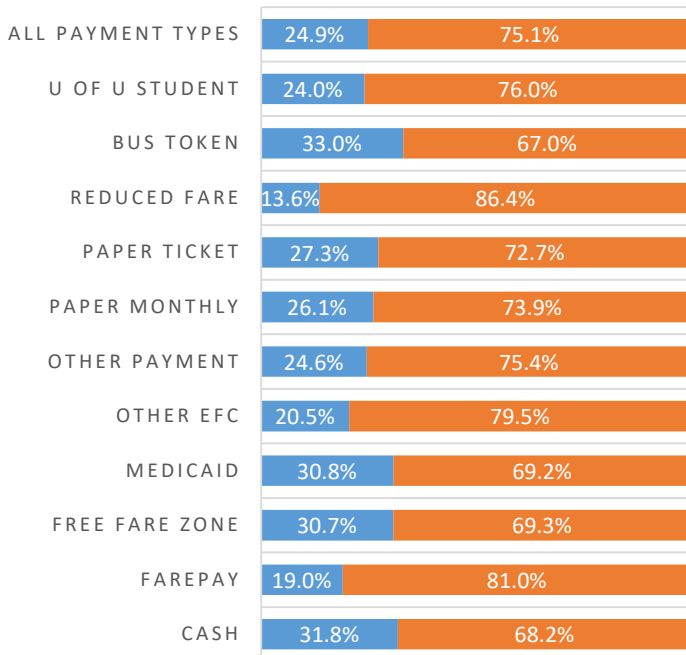


UTA has assessed the responses as to what method of payment was used in determining the demographics and usage of different fare payment types. These charts depict their payment type usage and the demographic/income levels of the riders surveyed.

Note: EFC: Electronic Fare Card

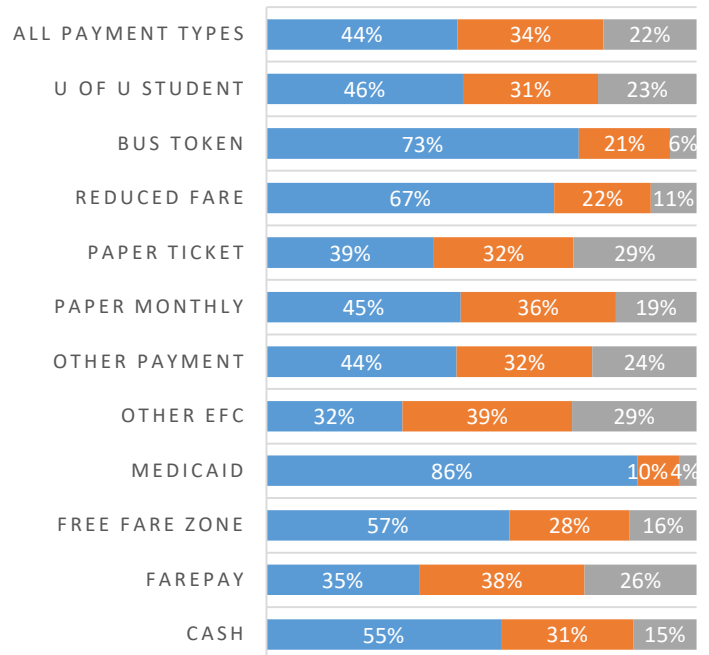
FARE USAGE BY RACE/ETHNICITY

■ Minority ■ Non-Minority



FARE USAGE BY INCOME

■ Low Income ■ Moderate Income ■ High Income



ATTACHMENT A – NOTICE TO THE PUBLIC

Title VI of the Civil Rights Act of 1964 protects you from discrimination due to race, color or national origin. If you believe you have been treated unfairly in receiving UTA services because of your race, color or national origin, please let us know.

El Título VI de la Ley de derechos civiles de 1964 lo protege de la discriminación por motivos de raza, color u origen. Si usted cree que ha sido tratado injustamente al recibir los servicios de UTA debido a su raza, color u origen, comuníquese con nosotros.

- **Contact UTA Customer Service at 801-743-3882**
Comuníquese con el servicio de atención al cliente de UTA al 801-743-3882
- **Submit electronic comment forms at rideuta.com**
Envíe un formulario electrónico para comentarios en rideuta.com



669 West 200 South
Salt Lake City, UT 84101

To: All Utah Transit Authority Customers
From: Utah Transit Authority
Date: August 7, 2011
Subject: Compliance with Title VI of the Civil Right Act of 1964

It is the policy of the Utah Transit Authority to comply with Title VI of the Civil Rights Act of 1964, which states: "No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

If you, as a customer of the Utah Transit Authority, feel that you have been excluded from participation in or denied services provided by the Utah Transit Authority because of your race, color, or national origin, please contact our Customer Concerns Department at one of the following telephone numbers.

Salt Lake City: 801-287-2667
1-877-882-0200

Ogden: 1-877-882-0200
Orem/Provo: 1-877-882-0200
Paratransit Services: 801-287-5359

Or, you may submit an electronic comment form through UTA's website at www.rideuta.com.

Para: Todos los clientes de Utah Transit Authority

De: Utah Transit Authority

Fecha: 7 de agosto de 2011

Tema: Cumplimiento del Título VI de la Ley de Derechos Civiles de 1964

La política de Utah Transit Authority es cumplir con el título VI de la Ley de Derechos Civiles de 1964, la cual establece que "Ninguna persona en los Estados Unidos debe, por razones de raza, color, o nacionalidad, ser excluida de participar, recibir beneficios, o ser sujeta a discriminación en cualquier programa o actividad que reciba asistencia financiera federal".

Si usted, como cliente de Utah Transit Authority, siente que ha sido excluido de participar o se le han negado los servicios brindados por Utah Transit Authority debido a su raza, color u origen nacional, comuníquese con el Departamento de Inquietudes para Clientes a uno de los siguientes números telefónicos.

Salt Lake City: 801-287-2667
1-877-882-0200
Ogden: 1-877-882-0200

Orem/Provo: 1-877-882-0200
Servicios de transporte para discapacitados:
801-287-5359

-O- Puede presentar un comentario por medio electrónico a través del sitio Web de UTA en www.rideuta.com.





ATTACHMENT B – TITLE VI COMPLAINT FORM



UTA Civil Rights Department
669 West 200 South
Salt Lake City, UT 84101

Civil Rights Complaint Form

The Utah Transit Authority (UTA) is committed to providing non-discriminatory service to ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in the receipt of its services. If you feel that you have been discriminated against on the basis of a protected status as listed below, please provide the following necessary information in order to facilitate the processing of your complaint. Please submit your complaint to UTA Customer Service by completing this form. If requested, you will receive a response within 20 business days if you've provided sufficient contact information. For an alternative format to submit your Civil Rights complaint, please contact Cherissa Alldredge, UTA's ADA Compliance Officer, at (801) 287-3536 or callredge@rideuta.com. Once completed, return form to:

**UTA Civil Rights Department
669 West 200 South
Salt Lake City, UT 84101**

This procedure is intended to satisfy UTA's obligation under the Americans with Disabilities Act and Title VI of the Civil Rights Act of 1964 and applies to anyone alleging discrimination *on the basis of protected class status* in UTA's provision of its services, activities, programs or benefits. This process is designed to provide you with the opportunity to quickly and effectively resolve any issue(s) as it relates to your civil rights and UTA. Your complaint will be investigated in accordance with UTA's complaint procedure.

Type of Civil Rights complaint:

- Race
- Disability
- Age
- Color
- Gender
- Sexual Orientation
- National Origin
- Religion
- Gender Identity

**Note: If your complaint does not relate to discrimination on the basis of one of the items above, please contact UTA Customer Service at (801) 743-3882 or rideuta@rideuta.com to issue your complaint.*

Are you filing this complaint on your own behalf? Yes No

If no, why have you filed for a third party? _____

What is your relationship to the person for whom you are filing the complaint? _____

Please confirm you have permission to submit complaint on behalf of a third-party. Yes No

Service Details

Date of Occurrence: _____ Time of Occurrence: _____

Route Number: _____ Boarding Location: _____

Direction of Travel: _____ Destination: _____

Vehicle Number: _____ Driver's Name: _____

Driver's Badge Number: _____



UTA Civil Rights Department
669 West 200 South
Salt Lake City, UT 84101

Formulario de Quejas de Derechos Civiles

La Autoridad de Tránsito de Utah (*Utah Transit Authority* (UTA)) está comprometida a proporcionar un servicio no discriminatorio para garantizar que ninguna persona sea excluida de participación, se le nieguen los beneficios, o sea objeto de discriminación al recibir sus servicios. Si considera que ha sido discriminado sobre la base de un estado protegido como se detalla a continuación, proporcione la siguiente información necesaria para facilitar el procesamiento de su queja. Envíe su queja al Servicio al cliente de UTA completando este formulario. Si lo solicita, recibirá una respuesta dentro de los 20 días hábiles, siempre que haya proporcionado suficiente información de contacto. Para obtener un formato alternativo para presentar su queja de Derechos Civiles, comuníquese con Cherissa Alldredge, Oficial de Cumplimiento ADA de UTA, al (801) 287-3536 o en calldredge@rideuta.com. Una vez completado, devuelva el formulario a:

**UTA Civil Rights Department
669 West 200 South
Salt Lake City, UT 84101**

Este procedimiento tiene el propósito de cumplir con la obligación de UTA bajo la Ley de Estadounidenses con Discapacidades y el Título VI de la Ley de Derechos Civiles de 1964 y se aplica a cualquier persona que alegue discriminación *sobre la base del estado de clase protegida* en la prestación de servicios, actividades, programas o beneficios de UTA. Este proceso está diseñado para brindarle la oportunidad de resolver de manera rápida y efectiva cualquier problema relacionado con sus derechos civiles y UTA. Su queja será investigada de acuerdo con el procedimiento de quejas de UTA.

Tipo de queja de Derechos Civiles:

- | | | |
|------------------------------------|------------------------------------|---|
| <input type="radio"/> Raza | <input type="radio"/> Discapacidad | <input type="radio"/> Edad |
| <input type="radio"/> Color | <input type="radio"/> Género | <input type="radio"/> Orientación sexual |
| <input type="radio"/> Nacionalidad | <input type="radio"/> Religión | <input type="radio"/> Identidad de género |

**Nota: Si su queja no tiene relación con discriminación sobre la base de una de las razones mencionados arriba, comuníquese con Servicio al cliente de UTA al (801) 743-3882 o en rideuta@rideuta.com para presentar su queja.*

¿Está presentando esta queja en su nombre? Sí No

Si no es así ¿por qué la ha presentado por un tercero? _____

¿Cuál es su relación con la persona por la que está presentando la queja? _____

Confirme que tiene autorización para presentar la queja en nombre de un tercero. Sí No

Detalles del servicio

Fecha en que ocurrió: _____ Hora en que ocurrió: _____

Número de la ruta: _____ Lugar en que abordó: _____

Dirección del viaje: _____ Destino: _____

Número del vehículo: _____ Nombre del conductor: _____

Número de la credencial del conductor: _____



ATTACHMENT C – CUSTOMER COMMUNICATIONS POLICY

UTA Standard Operating Procedure		
No. 5.1.1 - 1	Effective Date:	Supersedes: 6/21/2004
Title: Customer Communication Process for Non-Paratransit Complaints		

Purpose: To establish procedures for receiving, recording and responding to customer communications in a manner consistent with UTA corporate Policy No. 5.1.1.

Application: All UTA Employees. This Standard Operating Procedure applies to non-paratransit complaints.

Definitions:

“Customer Communication” means a statement of any kind (e.g., an in-person statement, telephone, email, letter or any other means of correspondence) about a UTA service or operation, which may be received by UTA directly from a person or through a third party (e.g., government agency or elected official). “Customer Communication” does not mean an inquiry from a person that solely seeks information relating to routes, schedules, or other aspect of UTA’s service, nor a formal communication, such a complaint raised with the Federal Transit Administration, the Equal Employment Opportunity Commission, or a communication relating to a lawsuit or potential lawsuit.

“Complaint” means a customer communication about a perceived problem or deficiency in UTA’s service or operation.

1.0 Procedure for Complaints That Do Not Allege Civil Rights Violations:

- 1.1 Employees will promptly direct all Customer Communications to the Customer Service Department.
- 1.2 The Customer Service Department will oversee the response process including the logging, routing, monitoring, handling and closing out of all customer communications.
- 1.3 The Customer Service Department will provide to each customer who provides a written, telephone message, or electronic communication, a courteous initial response within 24 working hours after receipt of the communication, to indicate that UTA received the communication.
- 1.4 The Customer Service Department will completely record all Customer Communications, regardless of type, in UTA’s central customer communications database, whether or not the communication warrants an investigation. Also, in the case of communications requiring investigation, each step in the follow up process will be recorded in the database as that step is completed.
- 1.5 The Customer Service Department will route each Complaint to appropriate staff within 12 working hours after receipt.
- 1.6 A business unit will investigate any Complaints relating to its service, the Regional General Manager of the business unit will establish a system for investigating Complaints within the business unit. The business unit will complete an investigation into a Complaint as soon as possible, but no longer than 10 working days after the receipt of

the Complaint in the business unit, unless special circumstances warrant a longer period of investigation. The Customer Service Department may contact appropriate business units staff to check the progress of investigations.

- 1.7 Once an investigation for a Complaint is complete or in the case of other types of Customer Communications, appropriate information is retrieved, the business unit or investigating employees will communicate the results to the handling Customer Service agent. That agent will then provide a response to the customer and log the result in the central customer communication database.
- 1.8 Every Customer Communication, regardless of its type, is to be closed out as soon as possible, but no longer than 14 working days after receipt of the communication unless special circumstances warrant a longer period.
- 1.9 The Customer Service Department will provide monthly customer communication reports to the business units and corporate offices and, when civil rights Complaints are involved, to the Civil Rights Office.
- 1.10 The Customer Service Department will identify emerging trends from recorded Customer Communications and will report these trends to the executives.

2.0 Procedure for Customer Complaints That Allege Civil Rights Violations:

- 2.1 The Customer Service Department will flag all Complaints alleging harassment or discrimination based on a protected class or Complaints alleging violations of the Americans with Disabilities Act.
- 2.2 A business unit will investigate any Complaints relating to its service, the Regional General Manager of the business unit will establish a system for investigating Complaints within the business unit. The business unit will complete an investigation into a Complaint as soon as possible, but no longer than 10 working days after the receipt of the Complaint in the business unit, unless special circumstances warrant a longer period of investigation. The Civil Rights Department may contact appropriate business unit staff to check the progress of investigation. The Civil Rights Department may determine the appropriate entity to lead the investigation of any Complaint.
- 2.3 An employee in the Civil Rights Department will follow-up with the business unit investigating the Complaint to provide advice as needed to ensure the customer Complaint is adequately investigated and addressed.
- 2.4 The business unit must contact the complainant, if the customer’s contact information was provided, to report on the outcome of the Complaint.
- 2.5 This investigation process is intended to satisfy UTA’s complaint procedures obligations under the Americans with Disabilities Act, as well as UTA’s general obligations under Title VI of the Civil Rights Act of 1964.

3.0 Civil Rights Complaint Appeal Process

- 3.1 If a customer is dissatisfied with the result of the business unit’s investigation into their Complaint alleging harassment or discrimination based on a protected class or

Complaints alleging violations of the Americans with Disabilities Act, customers shall have the opportunity to appeal the decision.

- 3.2 Customers wishing to appeal a decision regarding alleged violations of the Americans with Disabilities Act may file an appeal with UTA’s Americans with Disabilities Act (ADA) Compliance Officer.
- 3.3 Customers wishing to appeal the decision regarding alleged harassment or discrimination on the basis of other protected classes may file an appeal with UTA’s Title VI Compliance Officer.
- 3.4 Customers must submit their appeal to the relevant UTA Civil Rights staff within 30 calendar days after receiving a response from the business unit or after the complaint was originally submitted, whichever is longer. The appeal must be in writing and state all facts and arguments explaining why the complaint was not appropriately resolved. Information about how to file an appeal will be made available on the UTA website.
- 3.5 The relevant UTA Civil Rights staff will review the appeal and provide a written response within 30 calendar days of receipt of the appeal. All records related to customer appeals will be maintained for a period of time outlined in UTA’s records retention schedule, but in no case will records be retained for a period of less than one year.
- 3.6 This appeal process is intended to satisfy UTA’s due process obligations under the Americans with Disabilities Act, as well as UTA’s general obligations under Title VI of the Civil Rights Act of 1964.

Exceptions: None

This UTA Corporate Standard Operating Procedure was reviewed by UTA’s Chief Officers on January 15, 2019 and approved by the Interim Executive Director on, this 16TH day of JANUARY, 2019 and takes effect on the later date.



 Steve Meyer
 Interim Executive Director

Approved as to form:


 Counsel for the Authority

Revision History	
Adopted	6-30-2004
Policy Revised	1-15-2019

ATTACHMENT D – LIST OF COMPLAINTS

2016 Complaints

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
12/30/15	29789	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Trend	Operator coached
1/13/16	31059	Customer not allowed on bus with bike - Allegedly this is different treatment based on protected status	National Origin	Did not specify	Closed - Trend	No action taken - Policy allows operator discretion in deciding how to handle this situation
1/21/16	31751	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Trend	Operator coached
2/22/16	34677	Unfair treatment due to protected status	Race	Black/African American	Closed	No action taken - Policy allows operator discretion in deciding how to handle this situation
2/29/16	35314	Unfair treatment due to protected status	Race	Black/African American	Closed - Trend	Operator coached
3/8/16	36066	Operator passed desired stop - Allegedly due to protected status	National Origin	Hispanic	Closed	ion taken - Unable to corroborate customer account.
3/18/16	37006	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed	No action taken - Video contradicted customer account.
3/21/16	37208	Operator involved in political conversation with another customer - alleged discriminatory conversation	National Origin	Did not specify	Closed	Operator coached
3/25/16	37780	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed	No action taken - Policy allows operator discretion in deciding how to handle this situation
3/31/16	38374	Unfair treatment due to protected status	National Origin	Hispanic	Closed	No action taken - Investigation found no fault in UTA employee
4/4/16	38618	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Trend	Repeat call - Operator already coached
4/4/16	38573	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Trend	No action taken - Unable to corroborate customer account.
4/4/16	38624	Alleged different treatment based on race in a fare dispute	Race	Did not specify	Closed	Operator coached

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
4/5/16	38816	Customer observed negative treatment they stated was due to another person's protected class	Race	Black/African American	Closed - Trend	No action taken - Investigation found no fault in UTA employee
4/5/16	38765	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Trend	No action taken - Investigation found no fault in UTA employee
4/5/16	38746	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed	No action taken - Unable to corroborate customer account.
4/8/16	39219	Alleged different treatment based on race in a fare dispute	Race	Native American	Closed - Trend	No action taken - Fare payment was not valid.
4/27/16	41199	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Trend	No action taken - Unable to corroborate customer account.
5/14/16	43029	Passed by - Allegedly due to protected status	Race	Did not specify	Closed	No action taken - Video showed unsafe conditions
5/17/16	43245	Customer stated they were treated poorly due to protected status	National Origin	Latino/Brazilian	Closed	No action taken - Investigation found no fault in UTA employee
5/25/16	44100	Unfair treatment due to protected status	National Origin	Hispanic	Closed - Trend	No action taken - Unable to corroborate customer account.
6/6/16	44988	Passed by - Allegedly due to protected status	Race	Black/African American	Closed	No action taken - Operator was unable to determine that the customer wanted the bus as they were not at the stop
6/7/16	45215	Unfair treatment due to protected status	Race	Black/African American	Closed	No action taken - Investigation found no fault in UTA employee
6/9/16	45463	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Trend	No action taken - Video contradicted customer account.
7/12/16	48727	operator involved in allegedly discriminatory conversation	National Origin	Did not specify	Closed - Trend	Operator coached
7/23/16	49602	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Trend	No action taken - Investigation found no fault in UTA employee
8/31/16	53440	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Trend	No action taken - Investigation found no fault in UTA employee
9/8/16	54143	Passed by - Allegedly due to protected status	National Origin	Did not specify	Closed - Trend	No action taken - Unable to corroborate customer account.
9/12/16	54435	Unfair treatment due to protected status	Race	Did not specify	Closed - Trend	Operator coached

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
9/24/16	56000	operator involved in allegedly discriminatory conversation	Race	Black/African American	Closed	Operator coached
10/10/16	57585	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Trend	No action taken - Customer not at stop
10/10/16	57636	Unfair treatment due to protected status	Race	Black/African American	Closed	No action taken - Policy allows operator discretion in deciding how to handle this situation
10/27/16	59214	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Trend	No action taken - Video contradicted customer account.
11/5/16	60066	Customer observed negative treatment they stated was due to another person's protected class	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
11/7/16	60110	Customer stated they were treated poorly due to protected status	National Origin	Middle Eastern	Closed	No action taken - Unable to corroborate customer account.
11/8/16	60277	Unfair treatment due to protected status	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
11/12/16	60763	Customer not allowed on bus with bike - Allegedly this is different treatment based on protected status	National Origin	Hispanic	Closed - Trend	No action taken - Unable to corroborate customer account.
11/14/16	60774	Passed by - Allegedly due to protected status	National Origin	Hispanic	Closed - Trend	No action taken - Unable to corroborate customer account.
11/29/16	62180	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed	No action taken - No follow up from customer
11/30/16	62260	Passed by - Allegedly due to protected status	Race	Native American	Closed - Trend	No action taken - Customer not at stop
12/13/16	63465	Customer observed negative treatment they stated was due to another person's protected class	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
12/19/16	63979	TRAX operator did not deploy ramp - Allegedly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Customer attempted to board the train from the wrong side of the train.
12/28/16	64817	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed	Operator coached

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Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
1/4/17	65516	Fare dispute - Customer felt singled out due to protected status	Race	Did not specify	Closed - Not At Fault	No action taken - Upon follow-up, customer rescinded allegations and apologized. Operator let customer ride for free.
1/10/17	66209	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Not Verified	No action taken - Unable to corroborate customer account.
1/10/17	66253	Unfair treatment due to protected status	Race	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
1/14/17	66855	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not Verified	Operator coached
1/26/17	68014	Fare dispute - Customer felt singled out due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
2/2/17	68728	Alleged different treatment based on race in a fare dispute	Race	Did not specify	Closed	No action taken - Fare payment was not valid.
2/9/17	69548	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
2/18/17	70506	Customer was allegedly singled out due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
2/21/17	70585	Unfair treatment due to protected status	National Origin	Hispanic	Closed	Operator coached
2/28/17	71221	Passed by - Allegedly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
3/9/17	72390	Alleged different treatment based on race in a fare dispute	Race	Did not specify	Closed	No action taken - Unable to corroborate customer account.
3/11/17	72614	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Not Verified	No action taken - Unable to corroborate customer account.

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
3/20/17	73370	Fare dispute - Customer felt singled out due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
4/3/17	74689	Unfair treatment due to protected status	Race	Black/African American	Closed - Verified	No action taken - Unable to corroborate customer account.
4/4/17	74739	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Not At Fault	Customer educated on fare payment
4/4/17	74868	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
4/6/17	75049	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not Verified	No action taken - Unable to corroborate customer account.
4/11/17	75445	Passed by - Allegedly due to protected status	Race	Native American	Closed - Verified	No action taken - Customer not at stop
4/12/17	75619	Unfair treatment due to protected status	National Origin	Hispanic	Closed	Operator coached
4/13/17	75709	Discourteous Treatment from another passenger	Race	Black/African American	Closed	No action taken - Another customer was the offender
4/18/17	76129	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not Verified	Operator coached
4/19/17	76208	Alleged different treatment based on race in a fare dispute	Color	Did not specify	Closed	No action taken - Video contradicted customer account.
4/21/17	76379	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
4/21/17	76410	Passed by - Allegedly due to protected status	Race	Did not specify	Closed	No action taken - No customer visible in video of incident
4/26/17	76797	Customer was allegedly singled out due to protected status	Race	Polynesian	Closed - Not At Fault	No action taken - Operator addressed safety concerns
4/29/17	77111	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed	No action taken - Video contradicted customer account.
5/1/17	77164	Unfair treatment due to protected status	Color	Did not specify	Closed	No action taken - Unable to corroborate customer account.

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
5/3/17	77497	Customer was allegedly singled out due to protected status	National Origin	Hispanic	Closed	No action taken - Unable to corroborate customer account.
5/15/17	78583	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Verified	Operator coached
5/23/17	79351	Alleged different treatment based on race in a fare dispute	Color	Did not specify	Closed - Verified	Operator coached
6/7/17	80677	Alleged different treatment based on race in a fare dispute	Race	Native American	Closed	No action taken - Unable to corroborate customer account.
6/13/17	81309	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Operator addressed safety concerns
6/28/17	82703	Passed by - Allegedly due to protected status	Judaism	Jewish	Closed	No action taken - Unable to corroborate customer account.
7/27/17	85230	Passed by - Allegedly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
8/10/17	86720	Unfair treatment due to protected status	Race	Black/African American	Closed	Not enough information provided to follow up
8/14/17	86873	Passed by - Allegedly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
8/15/17	87080	Customer was allegedly singled out due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
8/26/17	88322	Passed by - Allegedly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
8/30/17	88682	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed	Not enough information provided to follow up
8/31/17	88843	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
9/5/17	89167	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
9/14/17	90214	Alleged different treatment based on race in a fare dispute	Color	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
9/15/17	90352	Operator was allegedly involved in discriminatory conversations with other passengers	Color	Did not specify	Closed - Not Verified	Operator coached
10/11/17	92877	Passed by - Allegedly due to protected status	Color	Did not specify	Closed - Verified	Verified pass by - Cannot determine if motive was racial
10/11/17	92937	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
10/13/17	93111	TVM malfunction resulted in customer getting a ticket for not paying a fare. Alleged the ticket was given due to protected status	Race	Did not specify	Closed - Not Verified	No action taken - TVMs appeared to be functional and the customer did not have valid fare. Let customer know he could appeal the ticket.
10/13/17	93154	Operator was allegedly involved in discriminatory conversations with other passengers	National Origin	Hispanic	Closed	Retrained Operator
10/19/17	93600	TRAX operator did not open the door - Allegedly due to protected status	Race	Asian	Closed	Not enough information provided to follow up
11/1/17	94614	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/2/17	94710	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/11/17	95492	Passed by - Allegedly due to protected status	Race	Did not specify	Closed - Verified	No action taken - Video contradicted customer account.
11/21/17	96363	Customer was allegedly singled out due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/21/17	96370	Customer stated they were treated poorly due to protected status	Race	Native American	Closed - Not Verified	No action taken - Unable to corroborate customer account.
11/28/17	96778	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
11/30/17	96926	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Verified	Verified pass by - Cannot determine if motive was racial
12/2/17	97160	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
12/6/17	97519	Fare dispute - Customer felt singled out due to protected status	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
12/6/17	97576	Fare dispute - Customer felt singled out due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
12/8/17	97793	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
12/11/17	97949	Passed by - Allegedly due to protected status	Race	Asian	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
12/26/17	99402	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.

2018 Complaints

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
1/8/18	100352	Passed by - Allegedly due to protected status	Race	Black/African American	Closed	Verified pass by - Cannot determine if motive was racial
1/9/18	100511	Discourteous Treatment from another passenger	Race	Black/African American	Closed - Not Verified	Train host coached
1/16/18	101092	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not Verified	No action taken - Unable to corroborate customer account.
1/30/18	102388	Smoking on UTA property - Customer felt singled out due to protected status	Race	Native American	Closed - Verified	Operator coached
2/1/18	102513	Not assisted at customer service area - Customer presented during a time when the office was closed - Alleged they were not helped due to their race.	Race	Did not specify	Closed	Put \$5 on FAREpay Card to compensate customer for inconvenience
2/1/18	102579	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Policy allows operator discretion in deciding how to handle this situation
2/8/18	103160	Passed by - Allegedly due to protected status	Color	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
2/21/18	104154	Operator was allegedly involved in discriminatory conversations with other passengers	Race	Black/African American	Closed - Not At Fault	Operator coached
2/24/18	104408	Alleged different treatment based on race in a fare dispute	Race	Did not specify	Closed - Not At Fault	No action taken - Policy allows operator discretion in deciding how to handle this situation
2/27/18	104575	Alleged different treatment based on race in a fare dispute	National Origin	Did not specify	Closed	No action taken - Video contradicted customer account.
2/27/18	104571	Operator passed desired stop - Allegedly due to the operator having dark skin and the customer having light skin	Color	White	Closed	No action taken - Customer provided incorrect information on timing and opportunity to pull video expired. Additionally, the operator was also white.
3/7/18	105340	Unfair treatment due to protected status	Color	Did not specify	Closed	Retrained Operator

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
3/19/18	106449	Alleged different treatment based on race in a fare dispute	Color	Did not specify	Closed - Not At Fault	No action taken - Train hosts cannot waive fare payment
3/26/18	106938	Customer stated they were treated poorly due to protected status	National Origin	Arabic	Closed - Verified	Operator coached
4/2/18	107525	Passed by - Allegedly due to protected status	Color	Did not specify	Closed	No action taken - Unable to corroborate customer account.
4/10/18	108361	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not Verified	No action taken - Unable to corroborate customer account.
4/12/18	108591	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
4/16/18	108843	Customer reportedly was told they had to speak English by an operator	National Origin	Indian	Closed	No action taken - Video contradicted customer account.
4/18/18	109026	Alleged different treatment based on race in a fare dispute	Race	Hispanic	Closed	Customer educated on fare payment
4/19/18	109197	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed	Operator coached
4/20/18	109302	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not Verified	No action taken - Unable to corroborate customer account.
4/20/18	109375	Customer stated they were treated poorly due to protected status	National Origin	Did not specify	Closed - Verified	No action taken - Investigation found no fault in UTA employee
4/23/18	109469	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
4/23/18	109543	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed	No action taken - Unable to corroborate customer account.
4/24/18	109630	Passed by - Allegedly due to protected status	Color	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
4/26/18	109771	Passed by - Allegedly due to protected status	Race	Black/African American	Closed	Customer not at stop
4/26/18	109862	Customer stated they were treated poorly due to protected status	Race	White	Closed	Operator coached

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
4/30/18	110085	Alleged different treatment based on race in a fare dispute	Race	Did not specify	Closed - Not Verified	No action taken - Unable to corroborate customer account.
5/1/18	110217	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Verified	Verified pass by - Operator coached
5/1/18	110110	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed	No action taken - Unable to corroborate customer account.
5/4/18	110521	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
5/5/18	110599	Another passenger was demanding that others on the bus should speak English	National Origin	Did not specify	Closed - Not At Fault	Operator coached
5/9/18	110980	Alleged different treatment based on race in a fare dispute	National Origin	Hispanic	Closed	No action taken - Investigation found no fault in UTA employee
5/10/18	111014	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Not At Fault	No action taken - Pass used appeared to be fraudulent
5/15/18	111459	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
5/30/18	112631	Passed by - Allegedly due to protected status	Race	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
5/31/18	112727	Passed by - Allegedly due to protected status	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
5/31/18	112761	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
6/13/18	113958	Alleged different treatment based on race in a fare dispute	National Origin	Hispanic	Closed - Not At Fault	No action taken - Video contradicted customer account.
6/19/18	114400	Customer stated they were treated poorly due to protected status	National Origin	Hispanic	Closed - Not Verified	No action taken - Unable to corroborate customer account.

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
6/22/18	114802	Passed by - Allegedly due to protected status	Race	Did not specify	Closed - Not At Fault	Stop not in service - No action taken
6/27/18	115176	Passed by - Allegedly due to protected status	Race	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
6/29/18	115390	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
7/2/18	115605	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed	No action taken - Investigation found no fault in UTA employee
7/3/18	115696	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not Verified	No action taken - Unable to corroborate customer account.
7/12/18	116418	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed	No action taken – No customer information provided.
7/14/18	116595	Alleged different treatment based on race in a fare dispute	Race	Pacific Islander/Native Hawaiian	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
7/16/18	116668	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed	Not enough information provided to follow up
7/18/18	116848	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
7/18/18	116841	Passed by - Allegedly due to protected status	Color	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
7/27/18	117591	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Video contradicted customer account.
7/28/18	117701	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
8/2/18	118080	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not Verified	No action taken - Unable to corroborate customer account.



Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
8/4/18	118264	Customer was allegedly singled out due to protected status	Race	Black/African American	Closed - Not Verified	No action taken - Unable to corroborate customer account.
8/11/18	118945	Alleged different treatment based on race in a fare dispute	National Origin	Hispanic	Closed - Verified	No action taken - Investigation found no fault in UTA employee
8/14/18	119225	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
8/23/18	120132	Customer stated they were treated poorly due to protected status	Race	White	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
8/28/18	120569	Customer alleged that UTA was not offering free passes to a school because it was largely a school for refugees	National Origin	Did not specify	Closed	UTA has information about free passes for educational programs on website - Directed person to set policy to ask for passes.
8/29/18	120796	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
8/31/18	121150	Alleged different treatment based on race in a fare dispute	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
9/4/18	121319	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
9/4/18	121351	Customer stated they were treated poorly due to protected status	Race	Native American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
9/7/18	121991	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed	Not enough information provided to follow up
9/20/18	123181	Passed by - Allegedly due to protected status	Race	Did not specify	Closed - Not Verified	No action taken - Unable to corroborate customer account.
9/25/18	123571	Passed by - Allegedly due to protected status	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
10/1/18	124039	Passed by - Allegedly due to protected status	Race	Native American	Closed	Verified pass by - Cannot determine if motive was racial

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
10/1/18	124048	Customer stated they were treated poorly due to protected status	Race	Native American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
10/5/18	124466	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
10/12/18	125165	Customer was allegedly singled out due to protected status	Race	Black/African American	Closed - Verified	Operator coached
10/22/18	125877	Customer stopped by UTA police - Matched description of suspect – UTA questioned the rider, who felt that it was racially motivated	Race	Black/African American	Closed	Customer was not the suspect - questioned for three minutes and released - After receiving complaint, officers followed up with complainant
10/24/18	126001	Customer observed negative treatment they stated was due to another person's protected class	National Origin	Hispanic	Closed	No action taken - Unable to corroborate customer account.
10/29/18	126384	operator involved in allegedly discriminatory conversation	Race	Did not specify	Closed - Verified	Operator coached
10/31/18	126564	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/2/18	126782	Unfair treatment due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/6/18	126958	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/8/18	127251	Customer was allegedly singled out due to protected status	Race	Did not specify	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/8/18	127246	Alleged different treatment based on race in a fare dispute	National Origin	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/9/18	127323	Customer stated they were treated poorly due to protected status	Color	Hispanic	Closed - Not At Fault	No action taken - Unable to corroborate customer account.

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
11/12/18	127481	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Unable to corroborate customer account.
11/19/18	128098	Customer stated they were treated poorly due to protected status	Race	White	Closed - Verified	Operator coached
11/26/18	128412	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed	Fare Inspector coached
11/29/18	128652	Alleged different treatment based on race in a fare dispute	Race	Black/African American	Closed	Fare Inspector coached
12/3/18	128921	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed – Not at Fault	No action taken - Unable to corroborate customer account.
12/3/18	128939	Customer reportedly was told they had to speak English by an operator	National Origin	Did not specify	Closed - Verified	Operator coached
12/3/18	128983	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed – Not at Fault	No action taken - Unable to corroborate customer account.
12/12/18	129803	Alleged different treatment based on race in a fare dispute	National Origin	Hispanic	Closed – Not at Fault	No action taken - Policy allows operator discretion in deciding how to handle this situation
12/14/18	129943	Passed by - Allegedly due to protected status	Race	Black/African American	Closed – Not Verified	No action taken - Unable to corroborate customer account.
12/15/18	130063	Unfair treatment due to protected status	National Origin	Hispanic	Closed - Verified	Operator coached
12/17/18	130235	Customer was allegedly singled out due to protected status	Race	Black/African American	Closed – Not at Fault	No action taken - Investigation found no fault in UTA employee
12/20/18	130619	Customer stated they were treated poorly due to protected status	Race	White	Closed – Not at Fault	No action taken - Operator addressed safety concerns
12/26/18	130875	Passed by - Allegedly due to protected status	Race	Did not specify	Closed – Not at Fault	Customer not at stop

ATTACHMENT E – TITLE VI COMPLIANCE POLICY

UTAH TRANSIT AUTHORITY CORPORATE POLICY

NO. 1.1.28

TITLE VI COMPLIANCE

- I. Purpose. Title VI of the Civil Rights Act of 1964 prohibits discrimination by recipients of federal financial assistance on the basis of race, color, or national origin. Utah Transit Authority, as a public transit provider and recipient of federal financial assistance, is subject to Title VI requirements as outlined in FTA’s Circular FTA C 4702.1B and future amendments.

In accordance with the Circular, UTA has developed this policy for measuring disparate impacts on minority populations and disproportionate burdens on low-income populations. UTA remains committed to avoiding unfair treatment and discrimination in the allocation of public transit services.

II. Definitions.

- A. *“Addition of Service”* means the creation of a new bus route or the opening of a new rail line.
- B. *“Discrimination”* refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.
- C. *“Disparate Impact”* refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- D. *“Disproportionate Burden”* refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.
- E. *“Eligible Low-income Individual”* means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. UTA will use the definition found in 49 U.S.C. 5302 as amended by Fixing America’s Surface Transportation Act (FAST): “an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved”.
- F. *“Low-income Population”* refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

- G. “*Major Change*” means a service or fare change which meets UTA’s definition in section III.B of this policy, and requires equity analysis in compliance with FTA’s Title VI Circular.
- H. “*Minority Persons*” include the following:
 - 1. American Indian or Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 - 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 - 3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 - 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
 - 5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- I. “*Minority Population*” means any readily identifiable group of minority persons who live in geographic proximity.
- J. “*National Origin*” means the particular nation in which a person was born, or where the person’s parents or ancestors were born.

III. Policy

- A. UTA prohibits discrimination on the basis of race, color, or national origin in the provision of public transit services, programs, and activities.
- B. *Public Input*
 - 1. UTA will seek public input on the following types of changes. These changes will be considered “major changes” which require equity analysis in compliance with FTA’s Title VI Circular.
 - a. The Addition of Service;
 - b. A proposed service level reduction in miles, hours, or trips of thirty-three percent (33%) or more of any route;
 - c. The elimination of all service during a time period (peak, midday, evening, Saturday, or Sunday);
 - d. A proposed twenty-five (25%) or greater change in route alignment;
 - e. A proposed fare change.

2. The type of public input opportunities used for service or fare changes described in Paragraph B(1) will be based on the requirements of Corporate Policy 1.1.6, Public Input Opportunities, and a demographic analysis of the population(s) affected, the type of plan, program and/or service under consideration, and the resources available, and may include any combination of the following:
 - a. Public hearings;
 - b. Public meetings;
 - c. Posted notices on UTA's website;
 - d. Outreach to minority groups and the non-English speaking community within UTA's service area;
 - e. Coordination with community and faith-based organizations, educational institutions, and other organizations that reach out specifically to members of affected minority and/or LEP (Limited English Proficient) communities;
 - f. Notices in radio, television, or newspapers including those that serve non-English speaking and/or minority populations;
 - g. Posting notices at bus stops, rail stations and on transit vehicles;
 - h. Use of social media, including those targeted at minority groups and the non-English speaking community.

C. *Evaluation and Analysis of Service and Fare Changes*

1. UTA will analyze proposed major changes to service and any proposed fare changes in accordance with FTA's Circular C 4702.1B as amended.
2. UTA will evaluate the impacts of all major service changes cumulatively when there is more than one route being affected for a service change period
3. UTA will primarily utilize American Community Survey (ACS) Data, block group data and/or ridership data to evaluate and analyze any proposed major service and fare changes. This data will be analyzed with Geographic Information System (GIS) software.
4. UTA will rely on population data and use the smallest geographic area that reasonably has access to the stop or station effected by the proposed major service change. This will be translated into a one-quarter mile radius to a bus stop, one-half mile to a light rail station and three miles to a commuter rail station.

D. *Disparate Impact and Disproportionate Burden Policy*

1. UTA will measure the burdens of service and fare changes on minority riders to determine when minority riders are bearing a disparate impact from the change between the existing service or fare and the proposed service or fare.
2. UTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service or fare and the proposed service or fare.

3. A threshold of 5% will be used to determine disparate impact on minority populations and disproportionate burden on low-income populations. This 5% is based on the margin of error from the US Census data that UTA uses to determine the populations in the service area. This means that if the burden of the service or fare change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, then the change will be considered either a disparate impact or a disproportionate burden.

E. *Finding a Disparate Impact*

1. At the conclusion of UTA’s Analysis, if UTA finds a disparate impact on the basis of race, color, or national origin, UTA shall seek to modify the proposed changes in a way that will mitigate the adverse effects that are disproportionately borne by minorities. Modifications made to the proposed changes must be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts.
2. If UTA chooses not to alter the proposed services changes despite the potential disparate impact on minority populations, or if UTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service or fare change, UTA may implement the change *only* if:
 - a. UTA has substantial legitimate justification for the proposed change; **and**
 - b. UTA can show that there are no alternatives that would have a less disparate impact on the minority riders but would still accomplish the transit provider’s legitimate program goals. In order to show this, UTA must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative

F. *Finding a Disproportionate Burden.* If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. The provider should also describe alternatives available to low-income passengers affected by the service changes.

G. *Transit Amenities Improvement Projects.* Transit amenities improvement projects will be reviewed for Title VI compliance prior to approval.

H. *Title VI Complaint Process.*

1. Any person who has a complaint relating to discrimination in receiving service from UTA based on race, color, or national origin can file a complaint and it will be investigated and responded to in a timely manner by the Civil Rights Office.

2. UTA has a Title VI Complaint Form which can be obtained from the Title VI Compliance Officer and on UTA’s website.
3. Complaints that come to UTA through the Customer Service department will be received, recorded and responded to according to UTA Corporate Policies No. 5.1.1, Customer Communications, 6.1.8 Equal Employment Opportunity, Anti-Discrimination Harassment, and Retaliation Polices and UTA Standard Operating Procedure, No 5.1.1-1, Customer Communication Process. After receipt of a complaint, the Investigator will investigate it and provide written findings of the investigation to all applicable parties within (15) calendar days of the conclusion of the investigation.

IV. Cross-References. UTA Corporate Policy No. 1.1.6, Public Input Opportunities; UTA Corporate Policy No. 5.1.1, Customer Communications, UTA Standard Operating Procedure No 5.1.1-1, Customer Communication Process, UTA Corporate Policy 6.1.8. Equal Employment Opportunity, Anti-Discrimination Harassment, and Retaliation Polices; Circular 4702.1B, Chapter VI, Sections 7(a)-(b); Standard Operating Procedure BU 7.0 – Transit Improvement Projects.

This UTA Corporate Policy was reviewed by the Corporate Staff on November 15, 2016, and approved by the President/CEO on this 17th day of November 2016, and takes effect on the latter date.



 Jerry Benson
 President/CEO

Approved as to form:



 Counsel for UTA

Revision History	
Adopted	5/22/2013 by UTA Board; 8/6/2013 by Corporate Staff
Revised	5/17/2016
Revised	11/15/2016

ATTACHMENT F – PUBLIC INPUT OPPORTUNITIES POLICY

UTAH TRANSIT AUTHORITY CORPORATE POLICY

NO. 1.1.6

PUBLIC INPUT OPPORTUNITIES

I. Purpose. This Corporate Policy is intended to ensure that UTA provides the best benefit to the communities it serves, and to employees in making operating decisions regarding levels of service and routing that are mutually beneficial to UTA and its customers based on considerations of market, economy, efficiency, and performance of service. This Policy is also intended to effectuate those goals within the limitations set out in the Board of Trustees Executive Limitations Policy 2.4.5.

II. Policy.

A. *Public Hearing.* UTA will provide public notice of, and conduct public hearings on:

1. A proposed service level reduction in miles, hours, or trips of thirty-three percent (33%) or more of any route;
2. The elimination of all service during a time period (peak, midday, evening, Saturday, or Sunday);
3. A proposed twenty-five (25%) or greater change in route alignment;
4. A proposed fare increase; or
5. A proposed capital project or grant application, as required by law.

B. *Public Hearing Officer.*

1. The General Manager will designate a public hearing officer to conduct public hearings on matters listed in paragraph A. The public hearing officer will attend each public hearing and report to the General Manager and the Board of Trustees Finance and Operations Committee the findings and conclusions regarding public comment received in the public comment period. The public hearing officer will also report to the Finance and Operations Committee any decision of the General Manager on a proposal listed in paragraph A.

2. The public hearing officer will notify the Committee of any changes in service and routes through the Finance and Operations Committee Report. The Regional General Managers will routinely notify the public hearing officer of such changes.

C. *Standard Operating Procedures.* Staff authorized by the General Manager will develop standard operating procedures to implement this Policy, including, but not limited to, procedures on notifying the public of proposals subject to public hearing, receiving

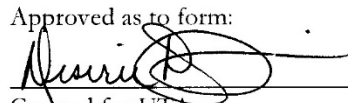
comment from the public on such proposals, arranging and conducting public hearings, compiling a public hearing record, and consideration of that record

III. Cross-References. Board of Trustees Ends Policy 1.2.3; Board of Trustees Executive Limitations Policies 2.4.2 and 2.4.5.


This UTA Corporate Policy was reviewed by the Policy Forum on June 22, 2004, and approved by the General Manager, on this 24th day of June, 2004, and takes effect on the latter date.



John M. English
General Manager and CEO

Approved as to form:


Counsel for UTA

Standard Operating Procedure		
No. 1.1.6-1	Effective Date: 5/6/2014	Supersedes: 6/22/2004
Tide: PUBLIC INVOLVEMENT PROCESS		

Purpose: This Procedure sets out a process for soliciting and considering public input on fare increases, major service reductions, service additions, capital projects, and grant applications in accordance with Board of Trustees Executive Limitations Policy No. 2.4.5 and Corporate Policy No. 1.1.6.

Application: All UTA Employees.

Procedure:

I. Definitions. As used in this Procedure:

"Grant application" means a grant application submitted by the Authority to the Federal Transit Administration.

"Major service reduction" means (1) the elimination of at least 33 percent of the distance, hours, or trips served along a fixed route, (2) the elimination of all service along a route during a time period, such as during peak, midday, or evening periods, or on a Saturday or Sunday, or (3) a change in at least 25 percent of a fixed route's alignment.

"Service addition" means the creation of a new bus route or opening of a new rail line. "Service additions" do not include increase in service to existing routes.

"Proposal" means a UTA proposal to raise fares, implement a major service reduction, or complete a capital project or grant application.

"Capital project" means a capital project funded in whole or in part by federal moneys. "Capital project" does not include projects involving an environmental assessment or an environmental impact statement when a third party consultant is retained by the Authority to administer the public involvement process. In such instances, the consultant will be obligated to administer the hearings in accordance with federal laws and regulations.

II. Process. Before UTA decides to raise fares, implement a major service reduction, undertake a capital project, or submit a grant application, it will solicit and consider public input as set forth in this Section.

A. *Notice.*

1. Notice requirement. At least 15 days before a hearing on a Proposal, UTA will provide the notice described in subparagraph (2) to the public, members of the Board of Trustees, the Mayor, City Manager, Council Chair, Planning Commission Chair, and the Economic Development Department representative of the municipality or county that may be affected by the Proposal, private transportation

carriers and, in the case of a Proposal relating to a capital project or grant application, to any other agency or group as required by federal law or regulation.

2. Contents of notice. The notice will reasonably describe the proposed change or project, any upcoming public involvement activities, including the times, dates, and locations of any public hearings and the deadline and place to submit written or recorded comments. The notice will indicate that reasonable accommodations will be made on advance request to persons with disabilities. Such requests might include requests for public information in alternate formats or sign language interpreters.

3. Publication. At a minimum, the notice will be publicized in a newspaper of general circulation to the communities that will be affected by the Proposal and on the State of Utah's public notice website. On request, the notice will be made available in alternate formats.

B. *Comment.* UTA will designate a single person or office and a website address to receive written comments during that time period. UTA will accept public comment on a Proposal received by the designated person or office, or postmarked, up to 5 days after a hearing on a Proposal.

C. *Public Hearing.*

1. Hearing requirement. UTA will provide to the public an opportunity for a public hearing to solicit public comment on a Proposal. UTA will hold more hearings at other times or locations as reasonably necessary to solicit broad community input from affected citizens, private transportation providers, and local elected officials.

2. Hearing arrangements. A public hearing will be arranged by the relevant business unit in the case of a proposed major service reduction or service addition, by the Board Coordination Office in the case of a proposed fare increase, and by the Capital Development Office in the case of a proposed capital project or grant application. As used in this paragraph, "arrange" includes scheduling the hearing, selecting a site for the hearing, preparing public information and notices and invitations related to the hearing, arranging for reporting services, providing for reasonable accommodations, and making all other necessary arrangements for the hearing. The site selected for a public hearing will be accessible as required under the Americans with Disabilities Act of 1990 and, to the extent practicable, will be located within one-quarter mile of a UTA fixed route.

3. Public Hearing Officer. A public hearing officer designated by the General Manager will preside at all public hearings relating to a Proposal. The Public Hearing Officer will announce the start and close of a public hearing, administer the first phase of the hearing, as set out in paragraph (4) of this section, and collect and maintain written and recorded comments.

4. Hearing Format. Hearings will generally follow an open house format with information displayed and UTA staff available to describe the proposal and answer questions. In some cases a formal presentation will be given during the hearing.

(a) During public hearing, the attendees will be invited by the Public Hearing Officer to meet informally with UTA staff, to ask questions of UTA staff, and to review displayed information regarding the Proposal. The Public Hearing Officer will also offer a brief introduction to the attendees, indicating the purpose for the hearing, and will explain the hearing process, including but not limited to methods for making public comment during and after the hearing, time frames for making public comment, and UTA's process for consideration of public comment.

(b) All attendees will be given the opportunity by the Public Hearing Officer to offer a recorded, verbal comment to a court reporter or the option of calling UTA customer service to record their comment. The attendees may also leave written comment with the Public Hearing Officer or mail or email comments in by the end of the comment period.

(c) In some cases public comment may be received through verbal comment at a microphone or to a recording device. The Public Hearing Officer may request that attendees wishing to make a verbal comment complete and submit to the Public Hearing Officer a speaker's card. The Public Hearing Officer may then call the attendees by name to make a comment in the order that the cards were received. The Public Hearing Officer may also limit the time allocated for recorded comment to no more than 3 minutes per attendee.

D. Public Involvement Record. The Public Hearing Officer will prepare a summary of all comments timely received by UTA, and findings and conclusions regarding those comments. The Public Hearing Officer will also compile a Public Involvement Record, which will include all written comments timely received by UTA, a transcript of audio recordings of verbal comments made at any public hearings, the comment summary, and the findings and conclusions. Within 90 days after the close of the written comment period, the Public Hearing Officer will provide the Public Involvement Record to the General Manager and to the Chair of the Board of Trustees Finance and Operations Committee.

E. Consideration of Public Comment. Before a final decision on a Proposal is reached, UTA will give due consideration to the comments and content of the Public Involvement Record. To facilitate this consideration:

1. The Public Hearing Officer will forward copies of the Public Involvement Record to each affected business unit before UTA reaches a decision on the Proposal.
2. In the case of a major service reduction and service addition, the Chief Operating Officer and service planners within each affected business unit will review the Public

Involvement Record before UTA reaches a decision on the Proposal.

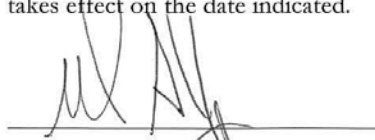
3. The Regional General Manager in the case of a major service reduction, the Chief Capital Development Officer in the case of a capital project, and the General Manager in the case of a fare increase, will consider, at a minimum, the costs of implementing any alternate proposal raised in a public comment, whether the alternate proposal is consistent with UTA's organizational financial plan, and whether the alternate proposal benefits a majority of the affected community.

4. The Public Hearing Officer or designee will, to the extent economically and administratively feasible, provide to each person who provided public comment, an acknowledgement of receipt of the comment, UTA's decision regarding the proposal, and a brief summary of (a) the number of hearings, attendees, and comments received, (b) significant areas of comment, and (c) changes made to the Proposal based on comments received during the public involvement process.

F. *Report of Decision.* The Public Hearing Officer will report to the Board of Trustees Finance and Operations Committee the General Manager's determination regarding the Proposal.

Exceptions: None.

This UTA Corporate Standard Operating Procedure was reviewed by the Corporate Staff on May 6, 2014, and approved by the General Manager on, this 7th day of May, 2014 and takes effect on the date indicated.



Michael A. Allegra
General Manager

Approved as to form:



Counsel for the Authority

Revision History	
Revised	5/6/2014

ATTACHMENT G – LEP PLAN



Utah Transit Authority Limited English Proficiency (LEP) Plan

INTRODUCTION

This Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities of Utah Transit Authority (UTA), as a recipient of federal financial assistance, relating to the needs of individuals with limited English language skills. LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

LEGAL REQUIREMENTS

The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and its implementing regulations, which states:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 16, 2000), indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of discrimination on the basis of national origin. The Executive Order states that recipients must take reasonable steps to ensure LEP persons have meaningful access to their programs and activities.

In addition, the Federal Transit Administration Circular 4702.1B dated October 1, 2012, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," reiterates the obligation to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and requires that FTA recipients develop a language assistance plan.

FOUR FACTOR ANALYSIS

The U.S. Department of Transportation (DOT) issued its Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons in Federal Register: December 14, 2005 (Volume 70, Number 239)1- This guide states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. This coverage extends to the recipient's entire program. There are four factors for agencies to consider when assessing language needs and determining what steps to take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient;
2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity or service provided by the recipient to people’s lives;
4. The resources available to the recipient and costs.

FACTOR 1: THE NUMBER OR PROPORTION OF LEP PERSONS IN THE AREA

The FTA identified four items that should be included in the first factor of the analysis, which comprise the headings below

HOW LEP POPULATIONS INTERACT WITH UTA

The way the general public interacts with UTA is through direct contact employees that facilitate our services. These would include positions such as vehicle (bus and light rail) operators, fare inspectors, UTA police officers, train hosts, customer service representatives, etc. Additionally, customers would interact with UTA through our written publications and our website.

IDENTIFICATION OF LEP COMMUNITIES

UTA reviewed data provided by LEP.gov to determine the proportion of LEP persons in the area. While 5.7% of the residents of the counties served by UTA are considered LEP, the most prevalent of the languages is, by far, Spanish comprising 72% of all LEP and make up 4.2% of the total population. There is a significant difference between the number of Spanish LEP speakers and all other language speakers, with the rest being 0.2% of the population or less.

The following table lists the languages with over 1,000 LEP speakers in the counties UTA serves.

Table 1: Top LEP Languages

	Total LEP Population	Percentage of Total Population	Percentage of LEP Population
Spanish	82145	4.2%	72.3%
Chinese	4780	0.2%	4.2%
Vietnamese	3604	0.2%	3.2%
Other Pacific Island	2530	0.1%	2.2%
Korean	1755	0.1%	1.5%
Serbo-Croatian	1711	0.1%	1.5%
Other Indic langs.	1701	0.1%	1.5%
Other Asian langs.	1488	0.1%	1.3%
African langs.	1326	0.1%	1.2%
Tagalog	1145	0.1%	1.0%
Russian	1101	0.1%	1.0%
Portuguese	1018	0.1%	0.9%

Source: LEP.gov/maps

LITERACY SKILLS OF LEP POPULATIONS IN NATIVE LANGUAGE

In examining the efficacy of written communications, UTA has identified the literacy rates in the main countries representing the languages spoken by highest populations of LEP persons. Below is a table that depicts the literacy rates of the countries where the most LEP persons may have originated from. Table 2 below depicts the adult literacy rates (15 years of age and older) of four major countries that contribute to the LEP population.

Table 2: Literacy Rates

	Literacy Rate
Mexico	94.9%
China	96.4%
Vietnam	94.5%
South Korea	97.9%

Source: CIA World Factbook & Unesco

Although Mexico is listed above, the Spanish speaking population is not exclusively from Mexico but from all over Latin America. In the Unesco regional overview of Latin America and the Caribbean, they estimate that adult literacy rates for the region was 92% in 2012 and has only increased since then.

Considering that high rates of literacy in the countries that the local LEP populations originate from, it would appear that written translations would be effective.

ANALYSIS OF LEP POPULATIONS’ SERVICE LEVEL

Analysis of UTA service has shown that minority, low income, and LEP populations are well represented in the proportion of service available. UTA has created maps showing where higher than average populations of LEP speakers reside. When there are proposed changes that may impact these communities, special consideration is given to provide notice and consideration to LEP persons. UTA planners are advised to review the impacts to those language speakers when making service changes, so that information regarding concentrations of LEP speakers can be used in formulating UTA’s public participation plan.

In examining the LEP maps produced of UTA’s service area, much of the areas are within walking distance to transit services. Additionally, UTA offers ample service in low-income and minority population areas, and much of the LEP community would be considered low-income and/or self-identify as a racial/ethnic minority.

FACTOR 2: FREQUENCY LEP INDIVIDUALS USE UTA

UTA has reviewed the most recent on board survey data to determine the general number of people that took the survey who reported that they spoke English “less than well” or “not at all”. Of the 16,408 respondents, 622 responded to indicate that they had limited English proficiency. This comprises 3.8% of the respondents.

Table 3: LEP Customer Service Calls

	2016	2017	2018	3 Year Total	Percent of LEP Calls
Spanish	496	803	734	2,033	93.2%
Arabic	8	5	32	45	2.1%
Farsi (Persian)	1	3	18	22	1.0%
Russian	10	8	2	20	0.9%
Burmese	5	5	2	12	0.5%
Mandarin	2	5	1	8	0.4%
Nepali	2	6	0	8	0.4%
Chinese	2	3	1	6	0.3%
Swahili	4	1	1	6	0.3%
Hindi	0	2	1	3	0.1%
Korean	1	2	0	3	0.1%
Portugease	1	0	2	3	0.1%
Vietnamese	2	0	1	3	0.1%
French	2	0	0	2	0.1%
Bosnian	0	0	1	1	0.0%
Dari	0	1	0	1	0.0%
Ilocano	0	0	1	1	0.0%
Italian	1	0	0	1	0.0%
Japanese	1	0	0	1	0.0%
Pashto	0	0	1	1	0.0%
Somali	0	0	1	1	0.0%
Tigrinya	0	0	1	1	0.0%
Total LEP Calls	538	844	800	2,182	
Total Calls:	370,503	322,591	275,853	968,947	
Percent of All Calls:	0.1%	0.3%	0.3%	0.2%	

Source: UTA Translation Contracting Report

Table 3 lists the number and languages UTA has required interpreter services for when customers contacted UTA’s customer service line. It is also worth noting that UTA has full time customer service staff that speak Spanish fluently and take Spanish speaking calls frequently. These calls are not represented on the chart below. The source of the data is from the contracted interpreting service UTA employs to address languages other than Spanish or provide Spanish translation services when staff is not available to take calls. Although the exact number of Spanish speaking calls is not tracked, it is estimated that customer service takes 15-20 Spanish speaking calls a day. Even when only factoring calls that have been outsourced, Spanish still comprises over 93% of the requests for interpretation UTA receives.

FACTOR 3: NATURE AND IMPORTANCE OF UTA ON PEOPLE’S LIVES

For many people, transit services are an indispensable part of their lives. The Department of Transportation’s LEP policy states that, “providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment.” Additionally, In UTA’s 2015-2016 survey of riders, 55% of the respondents said that UTA’s services or walking was their only option. When examining only minority populations’ response to this question, 64.6% of minority respondents stated that they had no transportation options other than UTA or walking.

FACTOR 4: RESOURCES AVAILABLE TO UTA

UTA is committed to assuring that resources are used to reduce the barriers that limit access to information and services by LEP persons. Many costs associated with delivery of service to LEP individuals are already included in the daily cost of doing business with a diverse population.

DOT’s LEP Guidance distinguishes oral language services (“interpretation”) from written language services (“translation”), so UTA will follow these definitions when looking at language assistance.

A) CURRENT LANGUAGE ASSISTANCE RESOURCES

- UTA employs several bilingual Customer Service Representatives and Paratransit Scheduling Specialists who work various shifts. Agents are able to transfer calls to the representative or a contracted translation service with the needed language skills. The specific languages and scheduled availability changes with the turnover of staff. UTA actively seeks to hire more bilingual Customer Service and Paratransit Scheduling staff.
- Since many of our employees have valuable language skills, a UTA Language Bank was created. This is a list of employees who are proficient in languages besides English and can be a resource when dealing with customers. A voluntary survey was administered to employees to gather the data. The list of employees, which notes the ability to speak, read, and write the language, will be maintained by the Title VI Compliance Officer and distributed to all managers and supervisors, and those departments most likely to need ad hoc language interpretation and translation services.
- Whenever UTA advertises public hearings, the notices include a statement saying that printed materials in alternate formats or a language interpreter for non-English speaking participants are available when requested at least five (5) working days prior to the date of the scheduled event. Notices are also posted on the State of Utah public notices website (<http://pmn.utah.gov>), which has a translation option that includes 35 languages.
- UTA created a “how to” video in Spanish for UTA's Ticket Vending Machines. The English version is the top viewed video produced by UTA with 61k views and the Spanish version is the 15th most viewed video with 5.7k views.
- UTA’s website has a button at the top of its home page and in the navigation bar which says “Español”, and the user can get a Spanish translation of anything on the site.
- Ticket vending machines at TRAX and FrontRunner stations have instructions in English and Spanish.
- Universal symbol pictures are on signs in buses, TRAX vehicles, and at stations showing safety warnings and rules for riding.
- Spanish instructions are on many buses, trains, and amenities (such as instructions for standing behind the yellow line, how to signal the operator for a stop, surrendering certain seats for passengers with disabilities, and location of emergency exits).
- UTA established an ongoing contract for telephone interpreting services. Information on how to use the service was distributed to all managers, supervisors, and Office Coordinators, and to all Customer Service employees. Training is provided for Customer Service employees on how and when to use the service.
- UTA has also established a contract with a community organization, the Refugee and Immigrant Center, for in-person interpreters.
- UTA utilizes professional document translation services consistently to ensure that the messages being conveyed to the public are correctly translated.

LANGUAGE ASSISTANCE IMPLEMENTATION PLAN

To evaluate possible improvements or alter the mix of language assistance services that UTA provides, resources that could be used for providing LEP assistance were reviewed. This included determining the cost of a professional interpreting and translation service, identifying which documents would be designated as “vital” for translation, taking an inventory of community organizations that UTA could partner with for outreach and translation efforts, and the amount of staff training needed and feasible.

The following sections outline the goals and processes UTA will follow to make improvements to the language assistance programs. Where resources are not available to implement all desired programs, ideas will be prioritized by importance and cost effectiveness by UTA’s top management, with recommendations from the Civil Rights department and from community organizations UTA has partnered with.

TASK 1: IDENTIFYING LEP INDIVIDUALS REQUIRING LANGUAGE ASSISTANCE

The four factor analysis, in section III of this plan, shows the percentages and estimates of the number of people in the LEP population in UTA’s service area.

UTA will continue to maintain maps which show census block groups where higher than average concentrations of LEP persons reside. These maps will be updated when new census data becomes available.

There are also several measures that can be taken to identify individuals who may need language assistance:

- When open houses or public meetings are held, a sign-in table is set up with a staff member there to greet and briefly speak to each attendee. This conversation will allow the employee to informally gauge the attendee’s ability to speak and understand English. If an interpreter of that language is available, the LEP person will be directed to speak with the interpreter. If no one is available, the employee can give the LEP person a card with information on where interpretation services can be obtained.
- Notices of open houses and public meetings will contain an explanation that language assistance for LEP persons is available upon request, along with a contact name and phone number.
- Employees at public events could utilize the telephone interpreting service for help dealing with LEP persons at the meeting. If requests are made ahead of time, in-person interpreters will be made available.
- Customers who come in to UTA offices or contact UTA by phone will be greeted by an employee familiar with how to connect them with appropriate interpreting services, either with a UTA employee or through an interpreting service.
- An automated Customer Service telephone menu system can answer many schedule questions in Spanish. Those needing more assistance can be connected to a Customer Service Representative.

TASK 2: LANGUAGE ASSISTANCE MEASURES

There are numerous language assistance measures available to LEP persons, including oral and written language services. UTA staff will respond to LEP persons in the most efficient and cost-effective way available, whether by telephone or in writing.

This section lists the ways in which language assistance will be provided.

UTA STANDARD:

Due to the wide gap between the number of Spanish LEP speakers and all the other language groups, UTA will routinely make vital document translations available in Spanish. Other languages will be added to this translation list if the proportion exceeds 4% LEP speakers in the UTA service area, as based on demographic data. Vital documents in other languages will be made available upon request or through use of the telephone interpreting service to have a document read to the LEP person. As shown in the table of interpreting services provided during the previous three years, UTA provides interpretation service in any language needed, even if UTA employees are unable to provide them internally.

A) WRITTEN TRANSLATION OF VITAL DOCUMENTS

“Vital documents” are defined as those documents without which a person would be unable to access transit services. If interactions with the public include letters, notices, or forms, and the nature of these documents would be considered of critical importance to LEP persons, consideration shall be given to written translation of the documents or forms. The Civil Rights department of UTA can be a resource in helping define what is and is not considered a vital document.

A vital document may include, but is not limited to:

- Applications
- Consent Forms
- Letters containing important information regarding participation in a UTA program or service
- Notices pertaining to the reduction, denial, or termination of service or benefits
- Notices or letters that require a response from the beneficiary
- Notices advising LEP persons of the availability of free language assistance
- Any future documents or outreach materials that are deemed to be a vital document

Whether or not a document (or the information it solicits) is “vital” will depend on the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not accurate or timely disseminated.

Sometimes a very large document may include both vital and non-vital information. This may also be the case when the document title and a phone number for obtaining more information on the contents of the document in languages other than English is critical, but the document is sent out to the general public and cannot reasonably be translated into many languages. In a case like this, vital information may include, for instance, providing

information in appropriate languages regarding where an LEP person might obtain an interpretation or translation of the document.

B) SIGNAGE

UTA’s Title VI Compliance Officer will work with the departments involved to determine what signage on vehicles or at transit stops and stations require translation. Heavy emphasis will be placed on using universal images or pictorial representations that can be understood without language on signage whenever possible.

UTA public buildings frequented by customers will be evaluated to determine the feasibility of posting signage or notices in the most commonly spoken languages stating that interpreters are available, and the phone number to reach UTA Customer Service to get that assistance.

C) PROVIDING ORAL LANGUAGE ASSISTANCE

Point to your language



UTA will not pass on to our customers the cost of providing language assistance to meet our LEP requirements. UTA will provide competent interpreters in a timely manner. The following are ideas that UTA has evaluated and will implement as resources become available to add to our current language assistance offerings.

- UTA will partner with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on UTA programs and services.
- Charts are available at many locations throughout our system (pictured to the left) that a person speaking a language other than English can point to the language they speak and UTA staff can call into our interpreter service to effectively communicate with LEP persons.
- UTA will post the UTA Title VI Compliance Policy and our Title VI Program on the agency website, rideuta.com.
- UTA will take reasonable steps to hire personnel with specific language skills. This may include using terminology similar to “second language skills preferred” on job announcements and ads, and giving extra credit for these skills during the selection process.
- During the evaluation process for people with disabilities at the UTA Evaluation Center, which UTA requires to qualify for Paratransit service, many LEP customers prefer to bring their own interpreter to appointments. The evaluation gathers detailed and personal information about the extent of the customer’s physical and mental limitations and functional abilities. UTA will continue to ask LEP customers to bring their own interpreter to these evaluation appointments. If a customer does not know someone who can interpret, UTA will provide a qualified interpreter at no cost to the applicant.

- “I Speak” charts which list various languages and let LEP persons point to identify their language. “Interpreter” cards which can be distributed to customers. The card states “Interpreter” in the nine most commonly used languages in the area, and gives the UTA Customer Service phone number (below).



FAMILY, FRIENDS AND BYSTANDERS: Surveys with UTA Bus Operators have indicated that most of the time another person is present on the vehicle who can assist in interpreting the language for LEP customers. UTA personnel should only use family, friends or bystanders for interpreting in informal, non-confrontational contexts, and only to obtain basic information at the request of the LEP customers. Using family, friends or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation. Barring a difficult circumstance, UTA personnel should not use minor children to interpret.

DIFFICULT CIRCUMSTANCES: UTA personnel are expected to follow the general procedures outlined in this Plan; however, difficult circumstances may require some deviations. In such situations, employees are to use the most reliable, temporary interpreter available, such as bilingual UTA personnel or a bystander. In an emergency, employees should ensure that everyone follows applicable evacuation or other procedures, and should be on the lookout for anyone who may not understand verbal instructions in English.

D) ENSURING THE COMPETENCY OF INTERPRETERS AND TRANSLATORS

UTA will verify the competency of people who may act as interpreters and translators as much as possible.

- UTA will rely on professional interpreting services whenever appropriate. UTA will not pass the cost of these translation services on to any customer.
- UTA will only use an interpreter or translator that is not from a professional service if they can demonstrate the ability to communicate or translate information accurately in both English and the target language.
- UTA will instruct the interpreter or translator not to deviate into a role as counselor, legal advisor, or any other role aside from interpreter or translator. Interpreters working for UTA must restate the UTA representative’s words in the target language and also translate replies in English for the representative, without adding any comments or asking any questions of their own.
- UTA will ask interpreters or translators to attest that they do not have a conflict of interest on the issues for which they would be providing interpretation services.

TASK 3: TRAINING STAFF

A part of ensuring meaningful access for LEP persons, UTA employees need to know their obligations under Title VI, and all employees in positions with regular public contact should be properly trained.

UTA will provide training to ensure that:

- Employees having contact with the public know about LEP policies and procedures.
- Employees having contact with the public are trained to work effectively with in-person and telephone interpreters.

UTA employees that are likely to come into frequent contact with LEP persons include:

- Customer Service Representatives and Telephone Information Specialists
- Paratransit Reservation agents
- Transit Police
- Bus Operators (Train Operators will be trained as resources allow, since they do not have much public contact.)
- Train Hosts

LEP TRAINING PLAN

Training will be conducted for all new employees, as identified above, will be combined with existing new training sessions that might be scheduled. LEP training shall include the following information.

1. A summary of the UTA's obligations and responsibilities to LEP persons under the DOT LEP Guidance;
2. A summary of UTA's language assistance plan and procedures;
3. A description of the types of language assistance that UTA is currently providing and instructions on how agency staff can access these products and services.

TASK 4: PROVIDING NOTICE TO LEP PERSONS

It is important to let LEP persons know what language services UTA provides and that those services are available free of charge. Notification ideas that UTA will use include:

- Having cards to distribute which state "Interpreter" in the nine most commonly used languages in the area, and lists the UTA Customer Service phone number to get that assistance.
- Stating in outreach documents (brochures, booklets, pamphlets, and flyers) that language services are available free of charge, and giving the phone number where those services can be obtained.
- Working with community-based organizations to inform LEP persons of the language assistance available.

- Presentations and/or notices at schools and religious organizations serving many non-English speakers, letting them know of important actions or where community involvement is critical.

EXISTING PUBLIC SERVICE ANNOUNCEMENTS AND COMMUNITY OUTREACH

UTA typically communicates to the public through the following methods:

- Announcements and handouts available in vehicles and at stations
- UTA website and social media sites
- Customer service phone lines
- Press releases
- Newspaper, radio, and television advertisements
- Announcements and community meetings
- Information tables at local events

Some of these communication tools are geared towards riders who are using the system, while other methods are intended to reach members of the public at large, who may or may not use the transit system. Both methods can be used to inform people of the availability of language assistance.

TARGETED OUTREACH TO LEP POPULATIONS

Targeted community outreach can consist of meeting with agencies that serve LEP populations and attending community meetings and events to inform people of the agency's service in general and that language assistance is available.

UTA will seek to partner with its existing community contacts and other agencies that are seen as credible and trusted to notify the LEP population of the availability of language services.

Notification can also be distributed through programs used by LEP persons, such as English classes for speakers of other languages.

TASK 5: MONITORING AND UPDATING THE LEP PLAN

UTA will determine, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and how we might want to provide notice of any changes in services to the LEP public and to employees. UTA will also consider whether changes in demographics, types of services, or other needs require more frequent reevaluation of the LEP plan.

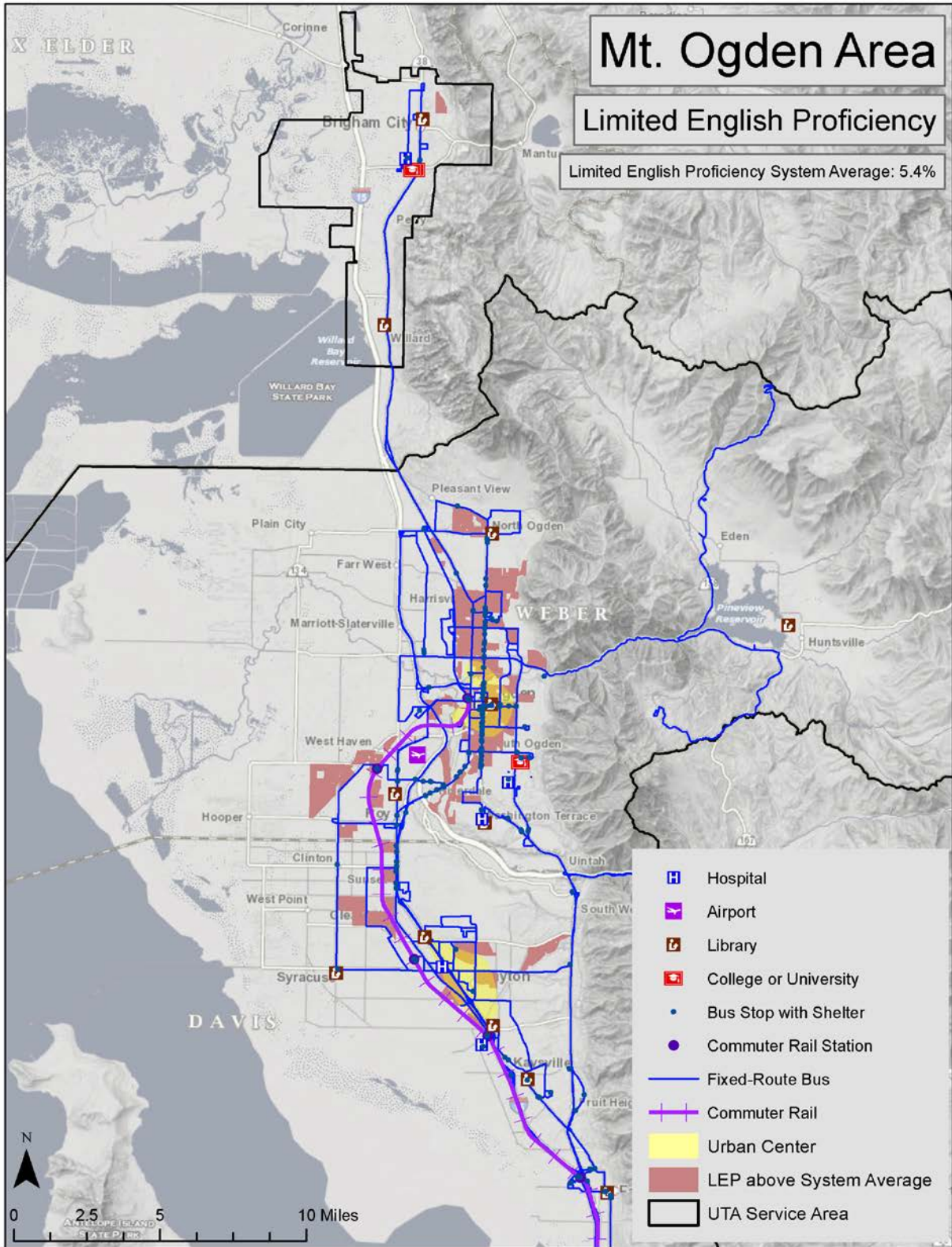
Evaluation of this LEP plan will help track UTA's outreach efforts, discover dissemination problems, make corrections, and find out whether language services provided have impacted UTA ridership and/or relations with local immigrant and other LEP communities. The results

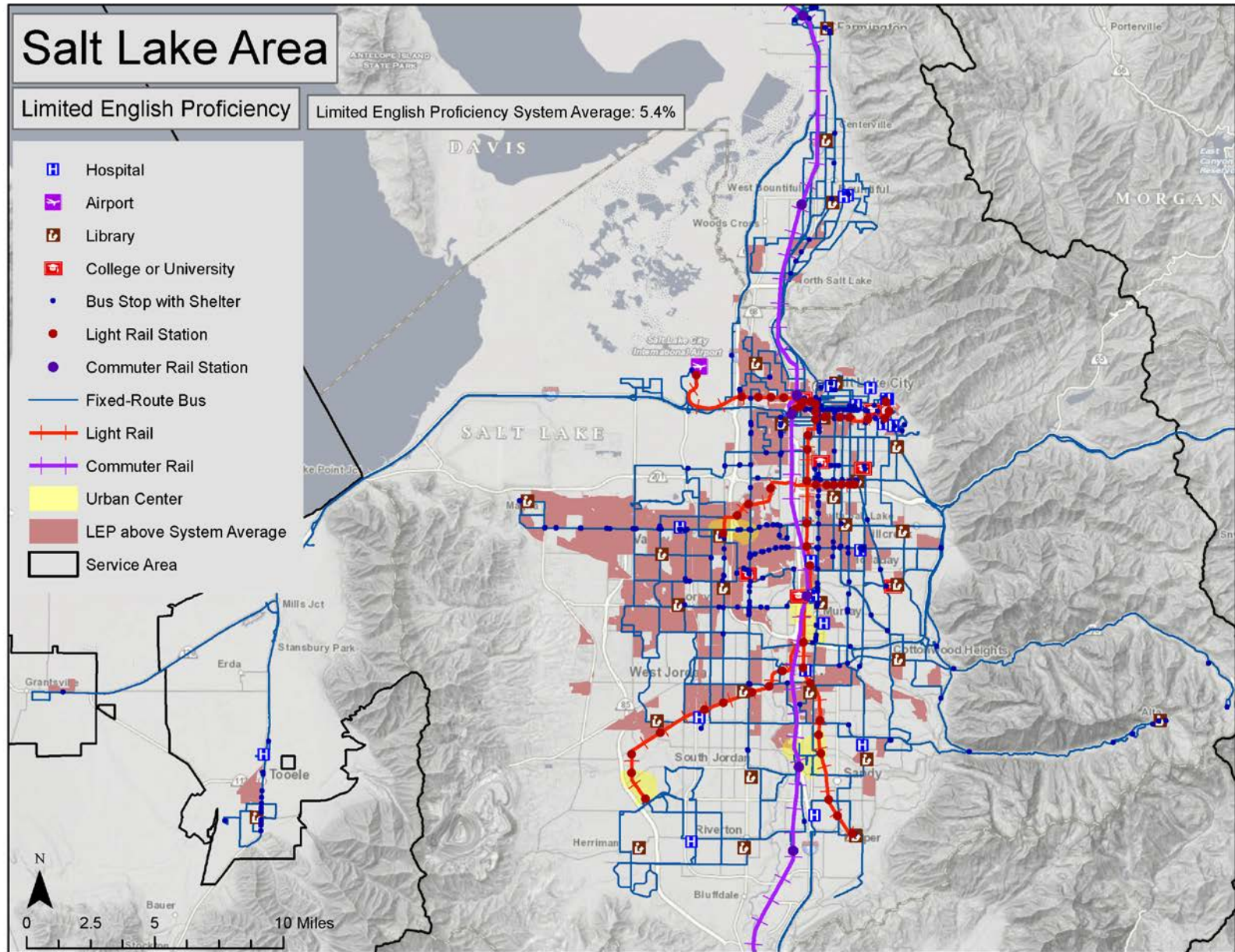
of this monitoring will help improve future efforts, as the LEP plan is meant to be an evolving document which will be updated as needed.

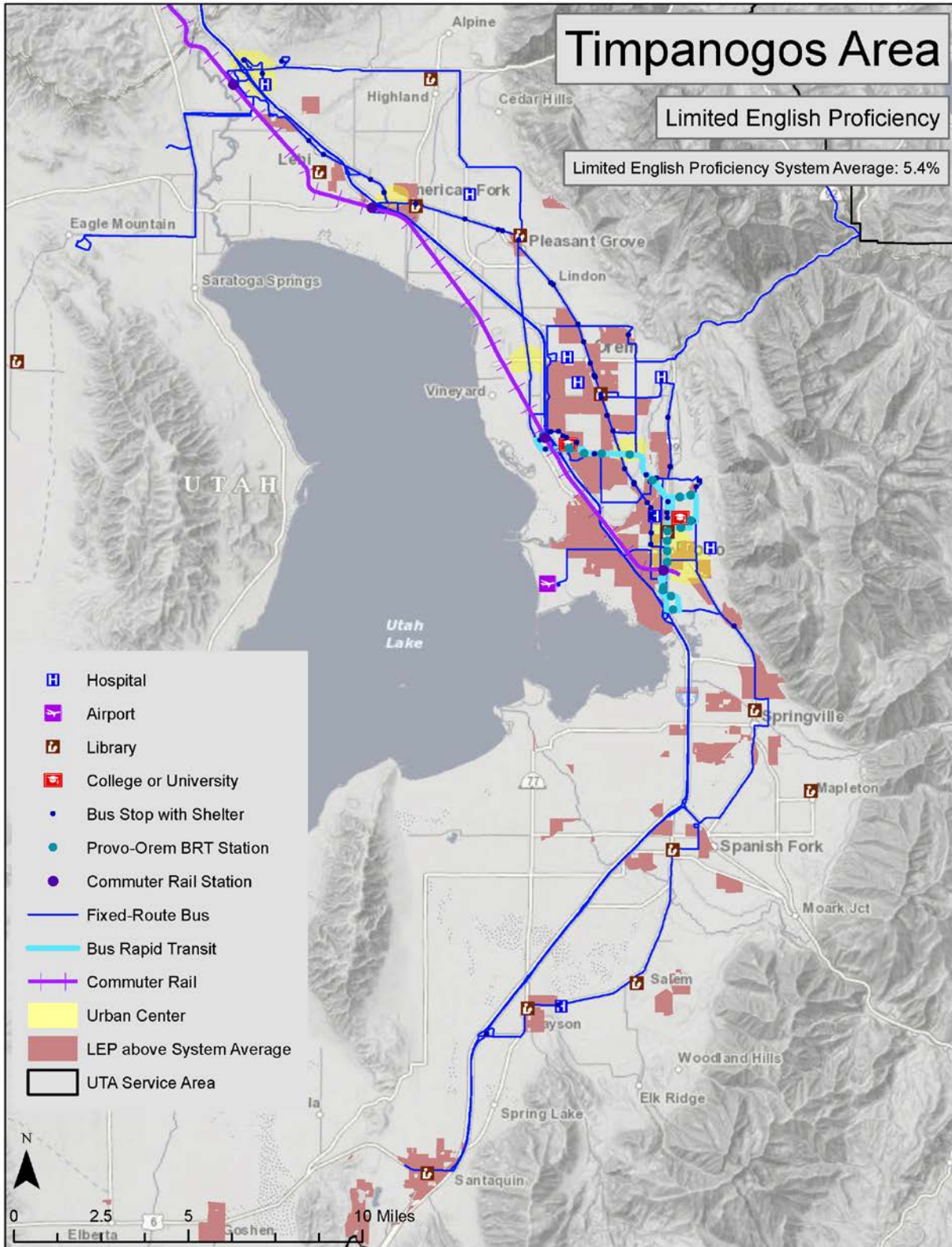
UTA has appointed a compliance officer to evaluate and monitor LEP services offered by UTA in conjunction with the relevant business units within UTA. The responsibilities of the Title VI Compliance Officer shall include reporting to the agency regarding the activities noted below.

- Periodically review demographic data regarding LEP service to evaluate emerging LEP populations
- Work with UTA departments to identify and address deficiencies in LEP services that may compromise meaningful access by LEP individuals to the programs administered by UTA
- Review suggestions for improvement to LEP service and determine whether implementation is practical, economical and consistent with the mission of the authority
- Monitor the implementation of reasonable improvements
- Prioritize those suggestions which cannot be implemented at a nominal cost to the authority. Consideration should be given to the number or proportion of LEP individuals who will benefit from the suggested improvement, the cost to the authority, and whether the change can be implemented in a manner consistent with, and without unduly burdening, the fundamental mission of the authority

LEP MAPS







ATTACHMENT H – RIDERSHIP SURVEY

UTA UTA 2015 On-Board Transit Survey

(for office use only) Route Code: Dir. N S E W Time: am / pm Interviewer: Serial #:

Please take a few moments to help plan for your transit needs by filling out this survey.

All personal information will be kept strictly confidential and **WILL NOT** be shared or sold.

What is your HOME ADDRESS? (please be specific, ex: 123 W. Main St):
 (If you are visiting the Salt Lake City area, please list the hotel name or address where you are staying)

Street Address City State Zip Code

COMING FROM?

1. What type of place are you **COMING FROM NOW?**
 (the starting place for your one-way trip)
 - Work
 - College / University (students only)
 - School K-12 (students only)
 - Medical Service / Hospital (non-work)
 - Shopping
 - Recreation / Sightseeing / Restaurant
 - Social Visit / Church / Personal
 - Airport (passengers only)
 - Your HOME → Go to Question #4
 - Other:
2. What is the **NAME** of the place you are coming from now?
3. What is the **EXACT ADDRESS** of this place? (OR Intersection if you do not know the exact address:)

 City: State: Zip:
4. How did you **GET FROM** the place in Questions #1-3 TO THE VERY **FIRST** bus or train you used for this one-way trip?
 - Walk
 - Bike
 - Wheelchair
 - Was dropped off by someone (answer 4a)
 - Drove alone and parked (answer 4a)
 - Drove or rode with others and parked (answer 4a)
 - Taxi (answer 4a)
 - Uber, Lyft, etc. (answer 4a)
- 4a. Where did you board the **FIRST** bus / train you used for this one-way trip?
 (Nearest intersection / Park-n-Ride lot):

GOING TO?

5. What type of place are you **GOING TO NOW?**
 (the ending place for your one-way trip)
 - Work
 - College / University (students only)
 - School K-12 (students only)
 - Medical Service / Hospital (non-work)
 - Shopping
 - Recreation / Sightseeing / Restaurant
 - Social Visit / Church / Personal
 - Airport (passengers only)
 - Your HOME → Go to Question #8
 - Other:
6. What is the **NAME** of the place you are going to now?
7. What is the **EXACT ADDRESS** of this place? (OR Intersection if you do not know the exact address:)

 City: State: Zip:
8. How will you **GET TO** your destination (Qs #5-7) after you get off the **LAST** bus or train you will use for this one-way trip?
 - Walk
 - Bike
 - Wheelchair
 - Be picked up by someone (answer 8a)
 - Get in a parked vehicle & drive alone (answer 8a)
 - Get in a parked vehicle & drive/ride w/others (answer 8a)
 - Taxi (answer 8a)
 - Uber, Lyft, etc. (answer 8a)
- 8a. Where will you get off the **LAST** bus / train you are using for this one-way trip?
 (Nearest intersection / Park-n-Ride lot):

9. Did you transfer FROM another bus or train **BEFORE** getting on this bus? Yes No
10. Where did you **GET ON THIS** bus? Please provide the nearest intersection / station name / Park-n-Ride lot:
11. Where will you **GET OFF THIS** bus? Please provide the nearest intersection / station name / Park-n-Ride lot:
12. Will you transfer TO another bus or train **AFTER** getting off this bus? Yes No
13. Please list the **BUS and TRAIN ROUTES** in the exact order for this one-way trip.

START → → → → → **END**
 1st Route 2nd Route 3rd Route 4th Route **Continue**

OTHER INFORMATION ABOUT THIS TRIP

14. What time did you BOARD this bus? _____ : _____ am / pm (circle one)

15. What fare payment methods were used for this one-way trip? (select all that apply)

<input type="checkbox"/> Paper Monthly Pass	<input type="checkbox"/> One-Way/Round Trip Ticket
<input type="checkbox"/> U of U Electronic Pass (Tap On)	<input type="checkbox"/> Other Electronic Fare Payment (Tap On)
<input type="checkbox"/> Senior/Disabled Reduced Fare	<input type="checkbox"/> Day/Group Pass
<input type="checkbox"/> Medicaid Punch Card	<input type="checkbox"/> Free Fare Zone
	<input type="checkbox"/> Other _____

16. Will you (or did you) make this same trip using the same transit routes in exactly the opposite direction today? No Yes - At what time did/will you leave for this trip in the opposite direction? _____ am/pm (circle one)

17. How often do you ride UTA? 7 days per week 6 days per week 5 days per week
 4 days per week 3 days per week 2 days per week 1 day per week
 Less than once per week First time riding

18. Did you have another option to make this trip today?
 Yes- I could have driven, carpooled, biked, taxi, Uber, etc. No- Riding UTA or walking was my only option

ABOUT YOU AND YOUR HOUSEHOLD

19. How many vehicles (cars, trucks, or motorcycles) are available to your household? _____ vehicles

19a. [If #19 is more than NONE] Could you have used one of these vehicles for this trip? Yes No

19b. [If #19 is NONE] Are you planning to buy a car as soon as you are able? Yes No

20. Including YOU, how many people live in your household? _____ people

21. Including YOU, how many people (over age 15) in your household are employed full/part-time? _____ people

22. What is your employment status? (check the one response that BEST describes you)

<input type="checkbox"/> Employed full-time	<input type="checkbox"/> Employed part-time	<input type="checkbox"/> Self-Employed (full or part-time)
<input type="checkbox"/> Homemaker	<input type="checkbox"/> Retired	<input type="checkbox"/> Not currently employed

23. What is your student status? (check the one response that BEST describes you)

<input type="checkbox"/> Not a student	<input type="checkbox"/> Yes - Full or Part-time College/university	<input type="checkbox"/> Yes - K - 12 th grade
<input type="checkbox"/> Yes - other _____		

24. Do you have a disability that limits the kinds of transportation you use? Yes No

25. Do you have a valid driver's license? Yes No

26. Do you have a smartphone (e.g. iPhone, Android / Windows Phone, Blackberry, etc.)? Yes No

27. What is your AGE? Under 16 16-18 18-24 25-34 35-44 45-54 55-64 65+

28. What is your race / ethnicity? (check all that apply)

<input type="checkbox"/> American Indian / Alaska Native	<input type="checkbox"/> Asian	<input type="checkbox"/> Black/African American	<input type="checkbox"/> Hispanic/Latino
<input type="checkbox"/> Native Hawaiian / Pacific Islander	<input type="checkbox"/> White	<input type="checkbox"/> Other: _____	

29. What is your gender? Female Male

30. Which of the following BEST describes your TOTAL ANNUAL HOUSEHOLD INCOME in 2014 before taxes?

<input type="checkbox"/> Less than \$10,000	<input type="checkbox"/> \$20,000 - \$24,999	<input type="checkbox"/> \$50,000 - \$74,999	<input type="checkbox"/> \$150,000 - \$199,999
<input type="checkbox"/> \$10,000 - \$14,999	<input type="checkbox"/> \$25,000 - \$29,999	<input type="checkbox"/> \$75,000 - \$99,999	<input type="checkbox"/> \$200,000 - \$249,999
<input type="checkbox"/> \$15,000 - \$19,999	<input type="checkbox"/> \$30,000 - \$49,999	<input type="checkbox"/> \$100,000 - \$149,999	<input type="checkbox"/> \$250,000 or above

31. Do you speak a language other than English at home? No Yes - Which language? _____

31a. [If #30 is Yes] How well do you speak English? Very Well Well Less than well Not at all

Please provide your contact info in the event that we need to contact you to better understand your answers.

Your Name: _____

Phone Number: (____) _____

ATTACHMENT I – BOARD RESOLUTION ON TITLE VI PROGRAM

(Intentionally Left Blank)

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY ADOPTING THE TITLE VI PROGRAM**

No. R2019-05-03

May 29, 2019

WHEREAS, the Utah Transit Authority (the "Authority") is a public transit district organized under the laws of the State of Utah and was created to transact and exercise all of the powers provided for in the Utah Limited Purpose Local Government Entities-Local Districts Act and the Utah Public Transit District Act;

WHEREAS, the Board of Trustees of the Authority, desires to adopt a Title VI Program and approve the system monitoring analysis contained therein in keeping with the Federal Transit Administration's requirements for public transit agencies and the Civil Rights Act of 1964; and


WHEREAS, the Board of Trustees of the Authority has reviewed the proposed Title VI Program and now desires to adopt it.

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Utah Transit Authority:

1. That the Title VI Plan attached as Exhibit A is hereby adopted by the Authority.
2. That the system monitoring and analysis contained within the Title VI Program is hereby approved by the Authority.
3. That the Authority's Title VI Plan, adopted by Resolution R2016-05-01 on May 25, 2016, is hereby replaced with the Title VI Program attached hereto.
4. That the Board formally ratifies prior actions taken by the Authority, including those taken by the Interim Executive Director and staff, that were necessary or appropriate to create the Title VI Program.


5. That a fully executed original counterpart of the final definitive Title VI Program and all related documents shall be permanently kept in the official records of the Authority and a copy of which is attached hereto as Exhibit A.
6. That the corporate seal shall be affixed hereto.

APPROVED AND ADOPTED this 29th day of May, 2019.



Carlton Christensen, Chair
Board of Trustees


ATTEST:



Robert K. Biles, Secretary/Treasurer
Brad Armstrong acting for Robert Biles

(Corporate Seal)

Approved As To Form:



Legal Counsel



ATTACHMENT J – SERVICE AND FARE EQUITY ANALYSES

Included in this section are all of the Service and Fare Equity (SAFE) Analyses conducted during calendar year 2016 through 2018. They include:

1. April 2016 Change Day Analysis.....Page 1
2. August 2016 Change Day Analysis.....Page 6
3. April 2017 Change Day Analysis.....Page 16
4. August 2017 Change Day Analysis.....Page 40
5. April 2018 Change Day Analysis.....Page 75
6. Provo-Orem BRT Title VI Equity Analysis.....Page 107
7. August 2018 Change Day Analysis.....Page 161
8. December 2018 Change Day Analysis.....Page 187



Title VI Analysis of Service Changes By Utah Transit Authority

April 10, 2016 Service Changes

Prepared by Ruth Hendricks
Title VI Compliance Officer
669 West 200 South, Salt Lake City, UT 84101
801-741-8871

Description of April 2016 Service Changes

The Timpanogos Division proposes eliminating two unproductive routes, the 836 and the 842, and redirecting those resources to routes that will serve more riders.

Timpanogos Division Changes	
Route 836 – Franklin, River Grove, Provo Station	Eliminate route
Route 842 – Orem 800 North, Center St., Orem Station	Eliminate route
Route 821 – South County, Provo Station	Increase frequency
Route 833 – Airport, Provo Station	Increase frequency
Route 834 – Riverwoods, Provo Station	Increase frequency
Route 850 – State Street	Increase peak service

This action will result in many customers receiving improved service and producing an increase in ridership.

Reasons for the Change

Planners noted that routes 836 and 842 had low ridership and they fell outside the Timpanogos service planning office’s efficiency measures. Recently UTA’s revamped service planning office helped establish service standards that flag routes when their performance falls outside specific performance measures and the routes that failed to meet the Timpanogos standards also failed these new UTA standards.

Ridership - **Route elimination** / Route increase

Route	Average Boardings per Trip	Average Boardings per Day
836	5	61
842	5	123
821	16	625
833	6	63
834	7	174
850	24	2,138

The number of boardings these service changes will generate is calculated using the average trip load of the improved routes being multiplied by the number of new trips, minus the average existing ridership on the routes being eliminated. Planners estimate the changes will produce 33,469 more boardings, annualized.

IPR (Investment per Rider) for all the affected routes are estimated to go from \$3.00 to \$2.88 and boardings per hour are estimated to go from 17.99 to 18.74.

What alternatives were considered?

- Doing nothing
- Delaying service changes until August 2016
- Moving ahead with the planned changes.

Various approaches taken over the last few years to support these routes include the following.

Changes to **Route 836** – Provo West side, Franklin/Dixon, Provo FrontRunner Station

- Aug 2015 - Minor Schedule adjustments
- Aug 2014 - Routing changed and schedule adjusted to 60/90 minute frequency.
- Aug 2013 - Alignment changed due to Rt 830 alignment change. Route and schedule adjusted for reliability and with some select trips reduced. 830 is a more direct alignment to match upcoming BRT alignment. So 833 and 836 alignments changed to cover old 830 alignment. 836 alignment extended to cover Provo College.
- Dec 2012- New circulator route in west Provo to make one-way clockwise loops to collect and distribute customers from the neighborhoods to the commuter rail station.

Changes to **Route 842** - Orem Center / 800 North

- Aug 2013 – Schedule adjusted for reliability with some reduction on select trips.
- Apr 2013 – Schedule adjusted to better meet trains.
- Dec 2012 – New service serves Orem Central station to Riverwoods via Geneva Road, 800 North, and Orem Center Street

The changes made have still resulted in low ridership on the routes.

Title VI Impact Analysis

For this analysis, the minority and low-income population within a ¼ mile buffer of the affected routes was calculated.

Affected Routes – Negative Impacts / Positive Impacts

Affected Routes	Type of Change	Total Population	Minority Population	% Minority	Low-Income Population	% Low-income
836	Route elimination	13,296	1,871	14.07%	4,044	30.40%
842	Route elimination	13,064	1,932	14.79%	2,366	18.11%
821	Additional trips	23,495	2,225	9.47%	2,868	12.21%
833	Additional trips	10,542	2,027	19.23%	2,814	26.69%
834	Additional trips	16,490	2,186	13.26%	7,050	42.75%
850	Additional trips	45,071	5,379	11.93%	9,156	20.3%
Total population		121,958	15,620	12.81%	28,298	23.2%
Total population - eliminations		26,360	3,803	14.43%	6,410	24.3%
Total population - additions		95,598	11,817	12.36%	21,888	22.9%

Regional Population Data

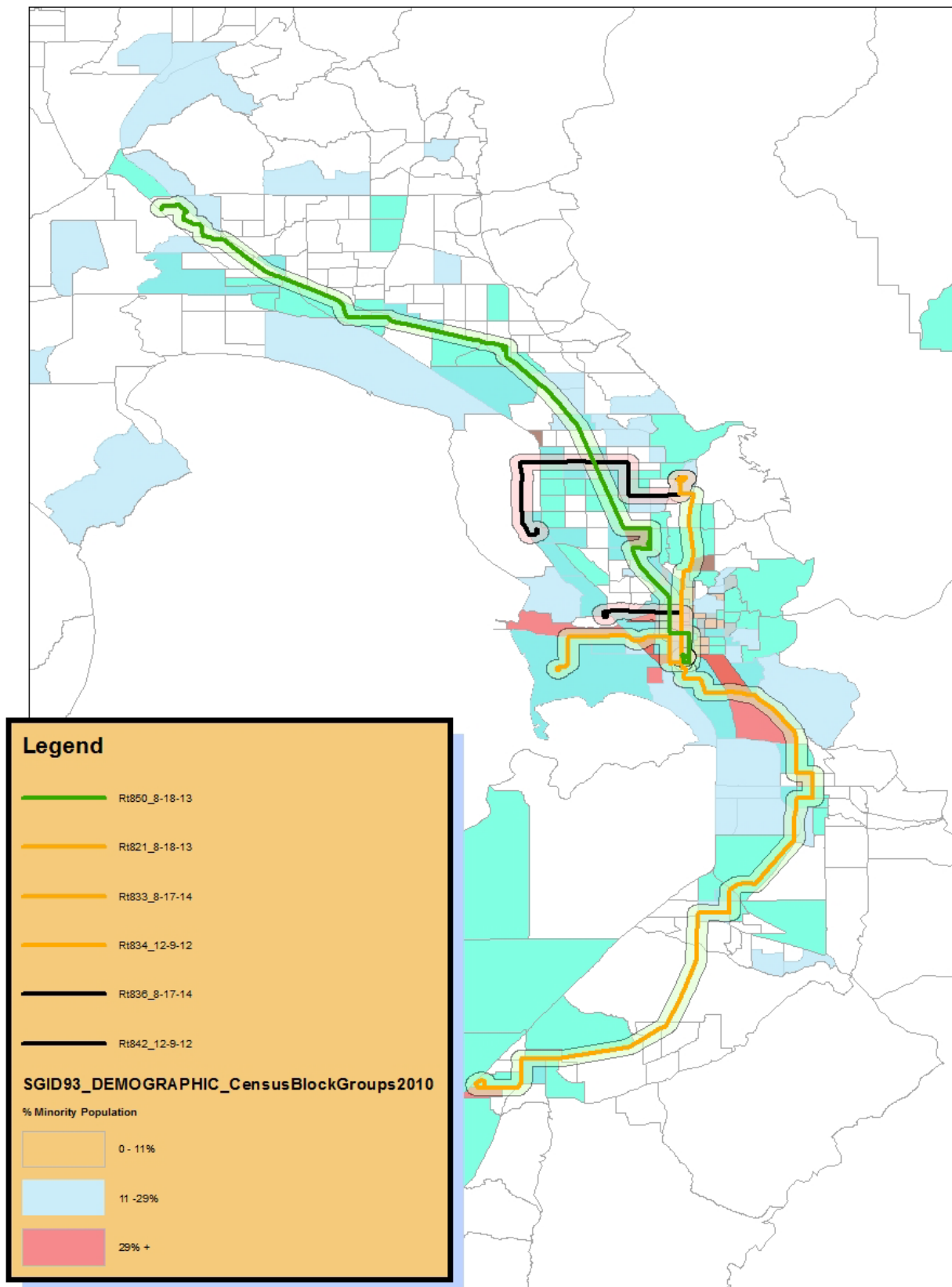
Total Service Area Population	Total Minority Population	% Minority	Total Households	Total Low-Income Households	% Low-Income Households
2,192,127	629,642	21%	664,137	142,512	21%

Conclusion

In comparing the demographics for the Timpanogos service change to the regional population for UTA’s service area, the minority percentage for the Timpanogos routes being eliminated is 14.4%. The minority percentage for the routes receiving added trips is 12.4%. Both of these percentages are well below the regional minority average of 21%. Also, both percentages are within the 5% threshold that UTA has set to determine disparate impact on minority populations Therefore, making the planned changes does NOT have a disparate impact on minority populations.

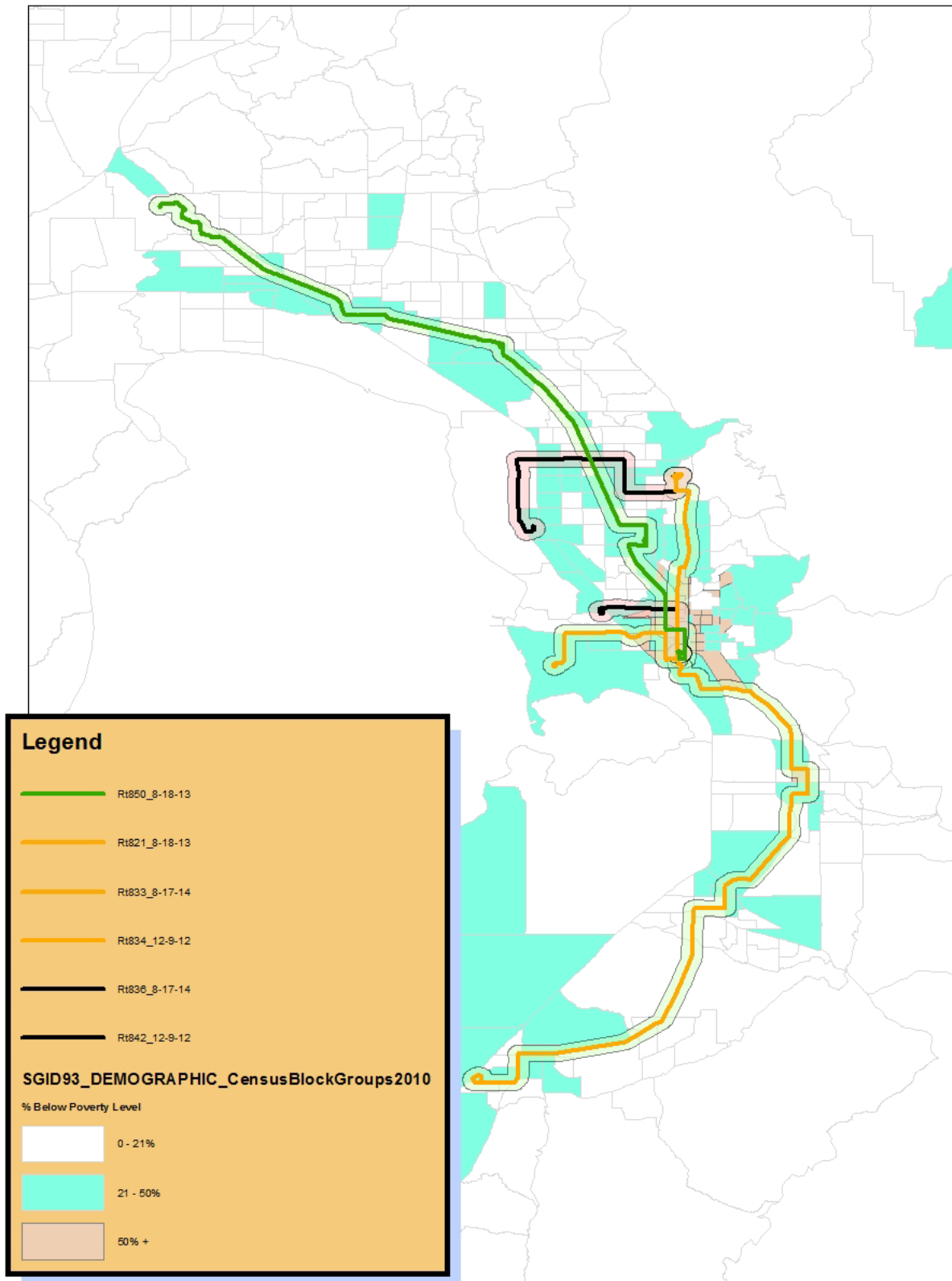
The low-income percentage for the routes being eliminated is 24.3%. The low-income percentage for the routes receiving added trips is 22.9%. Both of these percentages are above the regional low-income average of 21%, so all of these routes serve low-income areas. However, both route eliminations and route additions are within the 5% threshold that UTA has set to determine disproportionate burden on low-income populations. Therefore, making the planned changes does NOT have a disproportionate burden on low-income populations.

Minority Population Title VI Maps



The Black lines are being removed to add to the Gold and Green lines

Poverty Population Title VI Maps



The Black lines are being removed to add to the Gold and Green lines



TITLE VI SERVICE EQUITY ANALYSIS AUGUST CHANGE DAY 2016

Prepared by Kenya Fail
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The Federal Transit Administration (FTA) issued Circular 4702.1B in 2012, which defines Title VI and Environmental Justice compliance procedures for recipients of FTA-administered transit program funds. Specifically, the FTA requires recipients, including Utah Transit Authority, to “evaluate significant system-wide service changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact.”

The entire Title VI report for the Utah Transit Authority service changes concept plan is available online.

Definitions:

Minority: The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. Minority percentages in the Utah Counties Area are mapped in (See attached charts).

Low Income: The FTA defines a low-income individual as one whose household income is at or below the poverty guidelines set by US Census Bureau 2010-2014 American Community Survey (ACS). Thresholds are based on household size and income, which form the basis of this review. Low-income percentages in the Utah Counties Area are mapped in (See attached charts).

Disparate Impact: The Federal Transit Administration defines “disparate impacts” as neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is performed. This report uses qualitative assessments and/or the “four-fifths rule” to determine whether disparate impacts exist. In this analysis, if the quantitative results indicate the proposed service changes provide benefits to minority/low-income groups at a rate less than 80 percent of the benefits provided to non-minority/non-low-income groups, there could be evidence of disparate impacts and mitigation measures should be identified.

On Sunday, August 14, select rail and bus schedules will be changed to adjust connections, better utilize resources and, in some cases, implement Prop 1 improvements. Four routes in Davis and Weber counties will see improvements using Prop 1 funds, and Prop 1 funding will facilitate the addition of a new route in Davis County.

Davis and Weber Service Highlights

Routes 455 and 473 will have additional trips added to their schedules using Prop 1 funds. On route 640, Prop 1 funds will be used to expand Saturday service hours and increase bus frequency to every 30 minutes. Route 667, which runs from Farmington FrontRunner Station to Lagoon, will operate year-round Monday through Saturday to improve access to FrontRunner, Station Park shopping and the new University of Utah hospital.

Additions to Service						
Route	Total Population	Minority Population	Minority %	Households	Low-Income Household	Low-Income Household %
455	69,651	14,892	21.4%	26,199	7,952	30.4%
473	63,993	14,963	23.4%	24,457	8,203	29.5%
640	36,005	9,166	25.5%	12,393	3,511	33.5%
667	2,113	104	4.9%	636	57	38.6%
628	10,018	2,790	27.8%	3,797	1,464	38.6%

The chart listed above shows Routes 455, 473 and 640 are highly populated minority and low-income areas which have increased service and frequency. Route 667 has an increase to service and is highly populated in the low-income area. Prop 1 improvements will also be used to add a new route between Clearfield and Layton. Route 628, the Midtown Trolley, has been sponsored by local businesses and will be free to riders. This free service will directly benefit minority and low-income populations which are highly populated on this route. Eventually, unique buses with a trolley-style look will be used on the route.

Route 470 and 612 will also see small adjustments for improved reliability and connections. Some weekday trips on route 603 will no longer serve Ogden Clinic. Route 603 serviced on weekdays the Ogden Clinic with one early morning trip heading northbound. The route assisted with layover concerns in the system. The adjustment to this route was made to have a consistent pattern all day long. The route had an average of .08 people board or alight for 2015. The route services the Ogden Clinic on Sundays.

In comparing the demographics for the Davis and Weber county service changes to the total population for UTA’s service area, the minority percentage and low-income percentage for all routes increasing service directly benefit these areas. Based on the demographic data in U. S. Census Bureau and 2010-2014 American Community Survey, UTA found the average minority population in the service area is **22%** and average percentage of low-income households is **22%**. All routes with proposed increase of changes were over the average with the exception of route 455 and 667 in the minority category. Therefore, making the planned changes does NOT have a disparate impact on minority or low-income populations.

Salt Lake County Service Highlights

In Salt Lake, many bus routes had schedule adjustments to allow for improved connections and reliability. Routes 2,6, 17, 21, 33, 35, 39, 41 54, 62, 200, 201, 205, 209, 213, 217, 220, 232, 240, 248,320, 354, 509, 516, 519, 525 and 902 will all see minor schedule changes. All adjustments will facilitate in passengers easing connections within the system creating an added benefit for all users. The planned changes do NOT create a disparate impact on minority or low-income populations.

Utah Country Service Highlights

Utah County bus routes will also see small changes, as routes 805, 806, 821, 822 and 840 are adjusted to improve reliability and route 811 is adjusted to make connections with the new TRAX Blue Line schedule. A detour around an Orem WinCo on route 862 has been made permanent. The change allows route 862 to stay within the same block group which serves both minority and low income populations. Therefore, the planned changes do NOT create a disparate impact on minority or low-income populations.

Flex Route Service Highlights

Saturday service will be added to several flex routes in an effort to give flex route riders more travel options. Routes F94, F514, F504, F578, F556 and F618 will have Saturday service with 60 minute frequency between 7 a.m. and 7 p.m. The weekday headways for the routes listed above remained the same with the exception of route F504. Route F504 runs clockwise and the counterclockwise loop runs every forty minutes on Saturday instead of sixty minutes. The planned changes do NOT create a disparate impact on minority or low-income populations.

The table below is rounded to the nearest 5 minutes:

Route	LineName	DirectionName	Weekday		Saturday	
			APR2016	AUG2016	APR2016	AUG2016
F504	SOUTH JORDAN FLEX	LOOP-CCW	45	45	-	40
F504	SOUTH JORDAN FLEX	LOOP-CW AM/PM	30	30	-	-
F514	300 W FLEX	TO 10000 S TRAX	40	40	-	60
F514	300 W FLEX	TO DRAP FRTRNR	40	40	-	60
F556	5600 W FLEX	TO 6200 S	40	40	-	60
F556	5600 W FLEX	TO VA	40	40	-	60
F578	7800 S FLEX	TO 7800 S TRAX	40	40	-	60
F578	7800 S FLEX	TO JORDN LNDING	40	40	-	60
F618	OGDEN BDO FLEX	COUNTRCLOCKWISE	30	30	-	60
F94	SANDY FLEX	TO 9000 S TRAX	30	30	-	60
F94	SANDY FLEX	TO 9400 PNR	30	30	-	60

Rail Service Highlights

The weekend schedules of all TRAX lines and the S-line are being adjusted to improve transfers. The Frontrunner schedule will not be changed. The planned changes do NOT create a disparate impact on minority or low-income populations.

Title VI Impact Analysis

For this analysis, the minority and low-income population within a ¼ mile buffer of the affected routes was calculated.

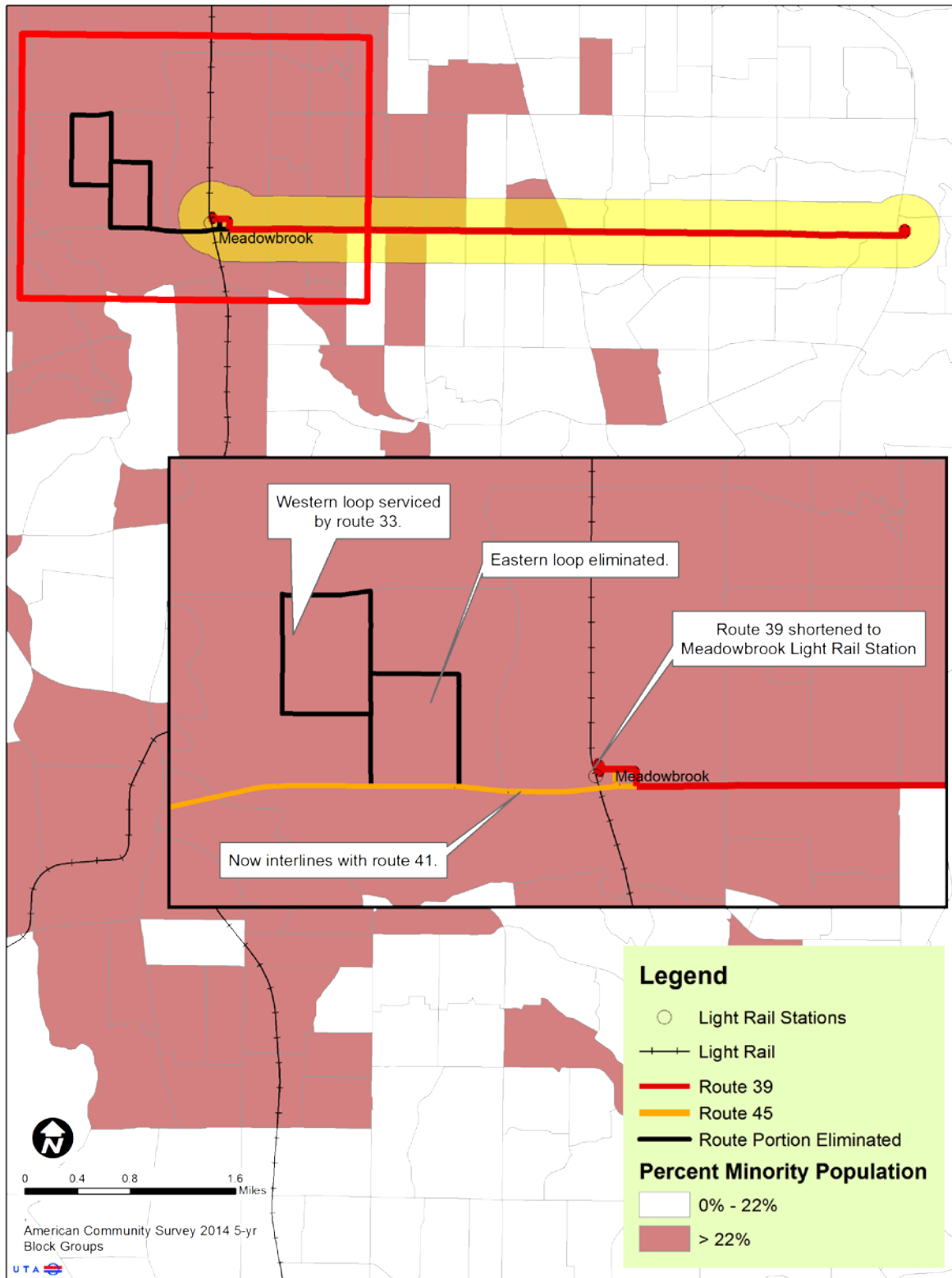
Current Regional Population Data

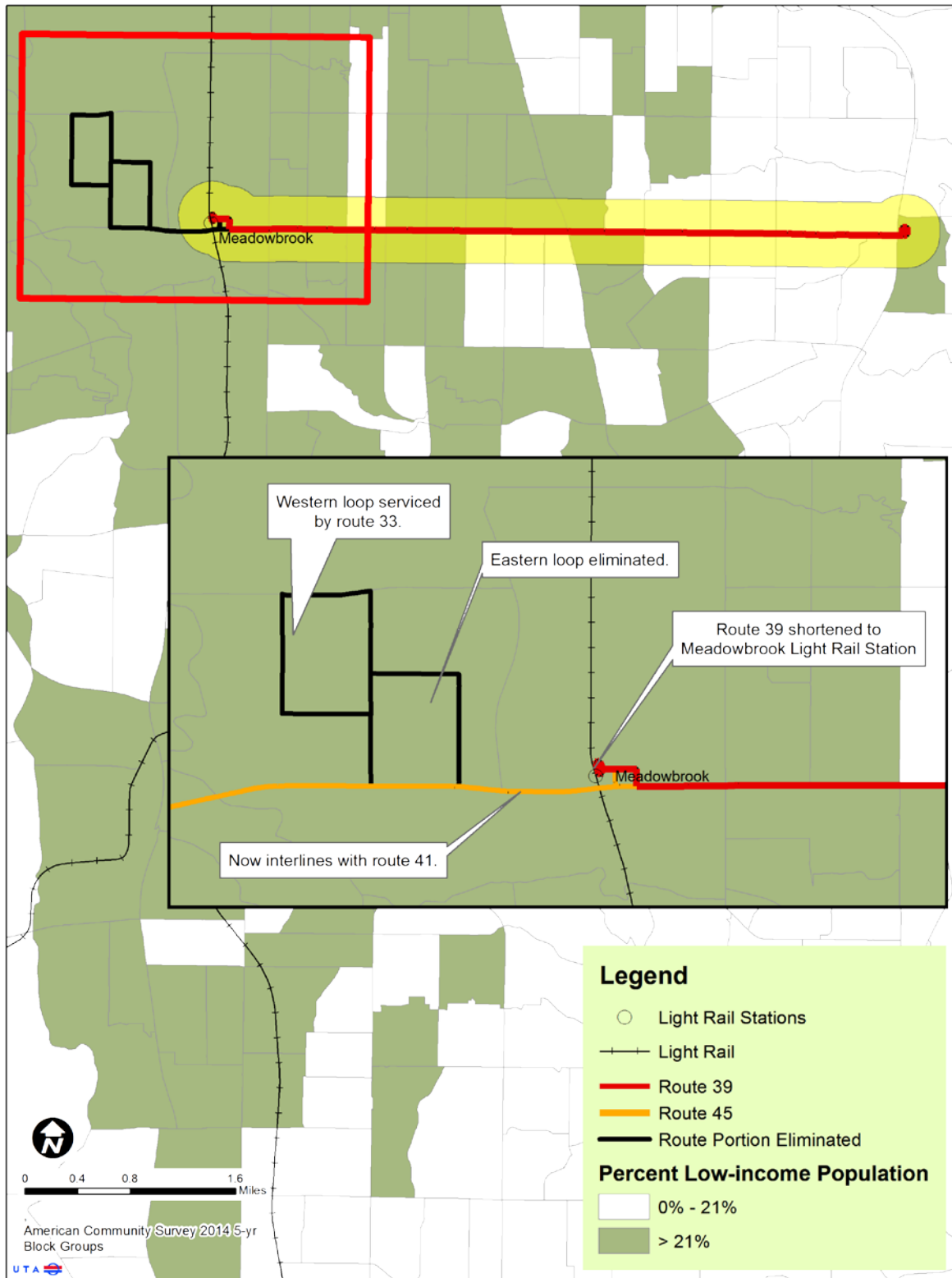
Total Service Area Population	Total Minority Population	% Minority	Total Households	Total Low-Income Households	% Low-Income Households
2,243,347	485,342	21.6%	696,768	147,241	21.1%

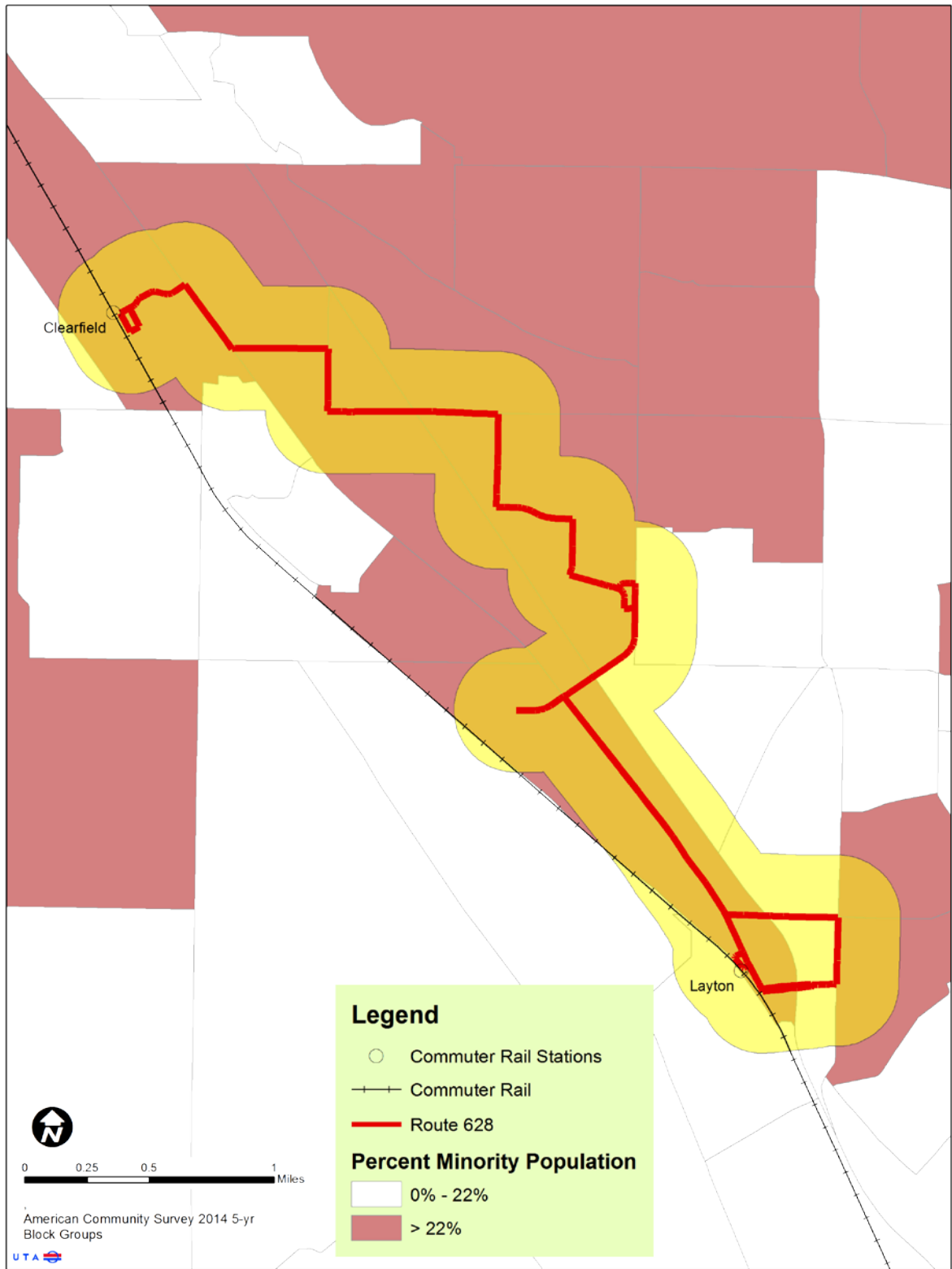
Conclusion

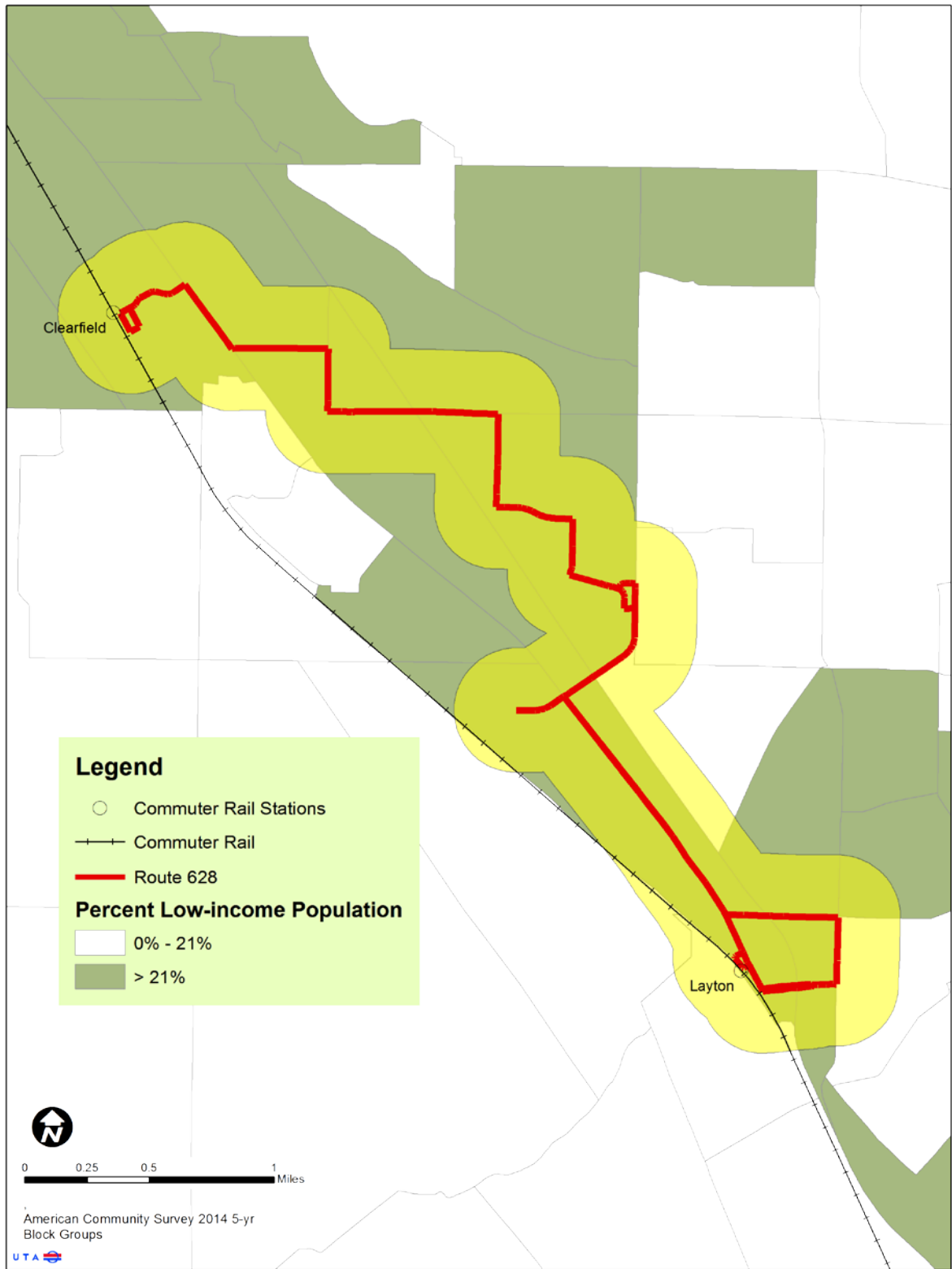
The service populations were reviewed and considered in all services changes for this period including minority and low income as listed above. Overall, none of the service changes increasing service, minor eliminatations or re-routings created any disparate impacts to minority or low-income populations. The majority of service was increased in minority or low-income population areas from April 2016 change day to August 2016 change day. See comparasion chart below:

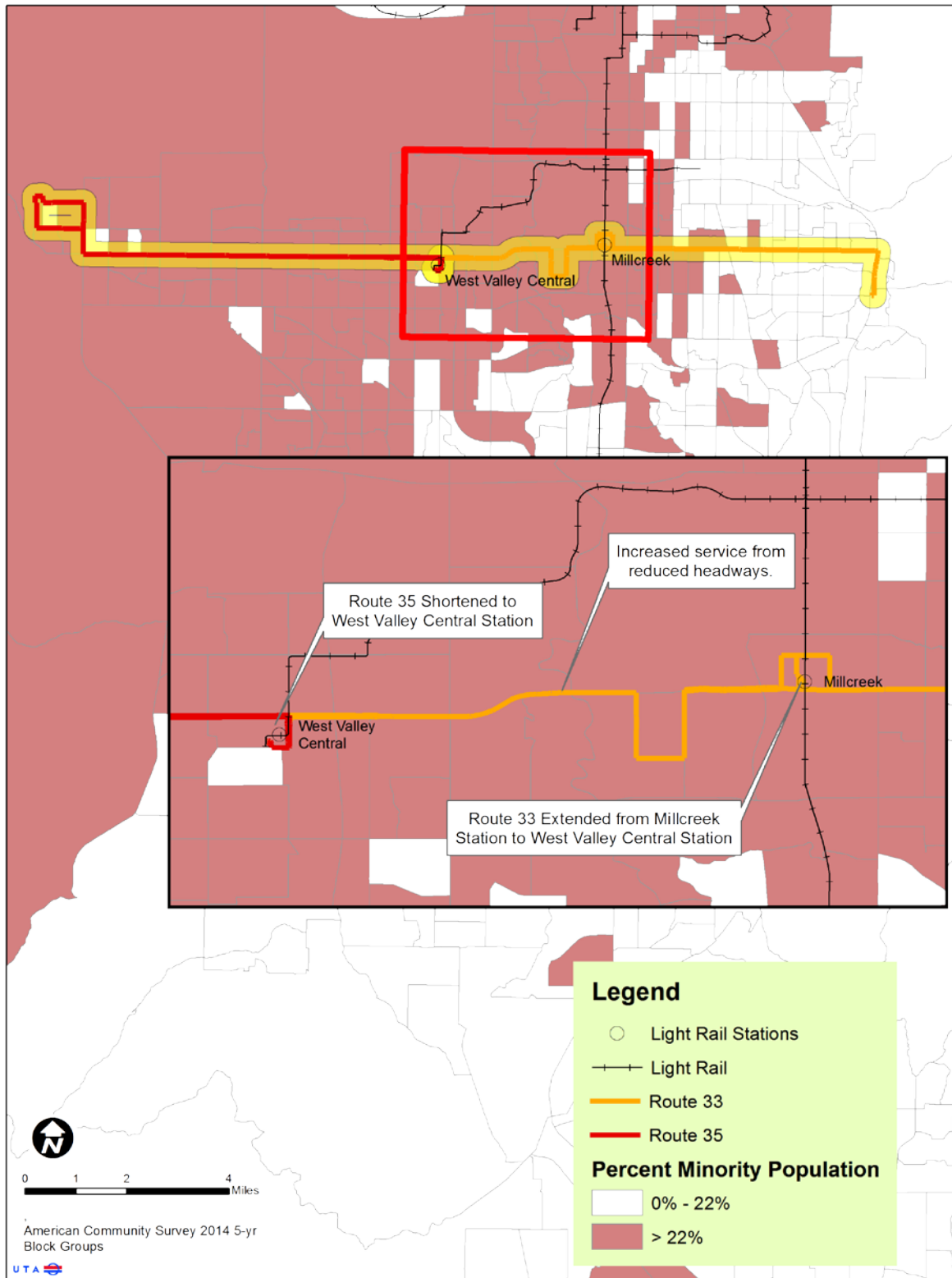
Route	APR2016			AUG2016			APR2016			AUG2016		
	Weekday	Saturday	Sunday	Weekday	Saturday	Sunday	Weekday	Saturday	Sunday	Weekday	Saturday	Sunday
33	44	24	8	87	45	35	714	370	132	1,324	655	553
35	53	49	17	32	32	25	897	826	313	564	533	491
39	57	23	7	42	18	7	892	371	109	607	271	108
455	103			133			2,020			2,630		
470	184	139	114	184	138	114	3,490	2,712	2,488	3,490	2,670	2,488
473	31			36			714			933		
628				27	23					381	334	
640	79	30		79	76		1,355	524		1,355	1,377	
667	35	14		11	12		577	226		186	205	
F504	16			16	10		353			353	218	
F514	18			18	8		321			309	162	
F556	16			16	9		289			289	165	
F578	18			18	9		322			322	176	
F618	16			16	9		332			332	160	
F94	18			18	7		293			295	129	

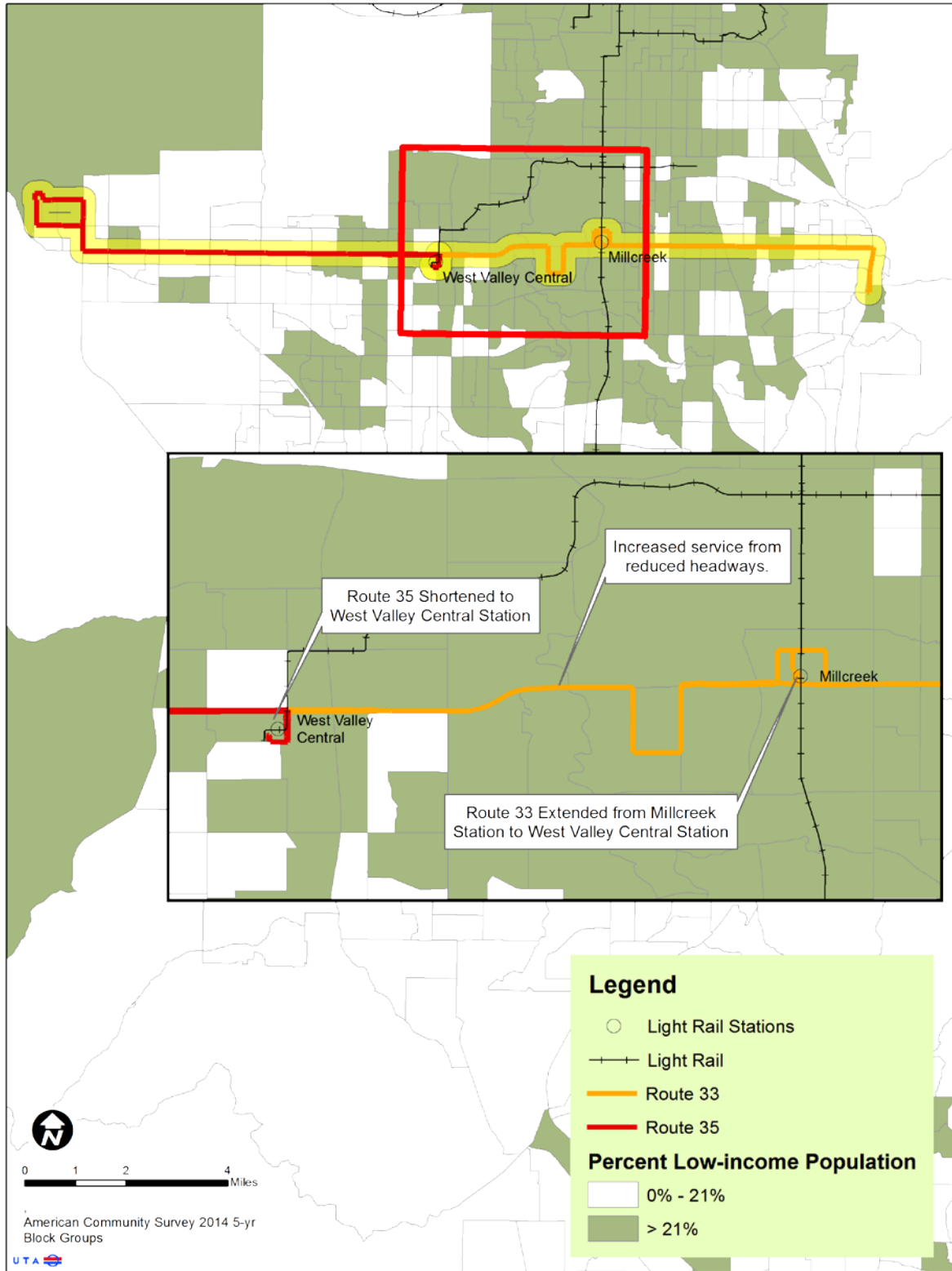














Title VI Service Equity Analysis

April 2017

Utah Transit Authority

Prepared by: Andrew Gray

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Utah Transit Authority has committed to the Federal Transit Administration (FTA) Title VI objectives set forth in Circular 4702.1B ensuring that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.

The following analysis is of proposed changes to be implemented in April of 2017. These changes are being proposed to improve service delivery. Though the proposed changes are facially neutral, this analysis, in accordance with FTA requirements, will ensure that these changes will not have disproportionate and negative impacts on minority and low-income populations within UTA's service area. If these changes are found to be discriminatory, UTA will take all steps necessary to ensure services are equitable and compliant with federal guidelines and requirements.

Summary of Proposed Changes

Route 477 – Cancellation of Route:

Route 477 connects Center Street in North Salt Lake to The Pioneer Adult Rehabilitation Center (PARC) in Clearfield. The proposed change will eliminate this route due to changes in partner needs, a historic decline in ridership and present low ridership.

The reduction of the mileage of any route in excess of 33% meets the major service change definition and must have a Title VI Analysis performed. This proposed change meets this definition.

Route 667 – Change in Routing and Schedule:

Route 667 is a "Free Fare Shuttle" in Farmington, which loops through the Farmington FrontRunner Station, Lagoon (amusement park) and downtown Farmington. Due to heavy loads in the summer and connection issues with FrontRunner, the proposal is to modify the schedule to provide better transfers to and from Frontrunner and spread passenger loads across trips. In order to accomplish this, there would be a reduction in services. Rather than a bus coming by roughly every 30 minutes from 8:09 am to 8:13 pm, no service will run to downtown Farmington in the AM and PM peak periods, and every 60 minutes during the mid-day.

Any changes proposing a change in alignment of 25% or greater meet the major service change definition and must have a Title VI analysis performed. This proposed change meets this definition.

UTA Policy and Definitions

UTA has developed corporate policy 1.1.28 Title VI Compliance Policy to evaluate the impacts of proposed major services changes on minority and low-income populations. The following policy references refer to subsections of the aforementioned corporate policy and were created to ensure that all equity analyses are performed using the same parameters.

Definitions

- A. *"Disparate Impact"* refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- B. *"Disproportionate Burden"* refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.
- C. *"Low-income Population"* refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/ transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.
- D. *"Minority Person"* include the following:
 - 1. American Indian or Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 - 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 - 3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 - 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

- 5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- E. "Minority Population" means any readily identifiable group of minority persons who live in geographic proximity.
- F. "National Origin" means the particular nation in which a person was born, or where the person's parents or ancestors were born.
- G. "System Average" The system average is the averages of minorities and low-income persons within the total populous of the geographic regions that UTA serves. The present system averages are expressed below in tabular format using 2011-2015 5-year population estimates provided by American Community Survey (ACS) data.

<i>Low-Income System Average:</i>	
Number of Households:	703,314
Low-Income Households:	144,649
Percent Low-income:	20.6%

<i>Minority System Average:</i>	
Population:	2,273,056
Minority Population:	499,458
Percent Minority:	21.97%

Major Service Change

UTA will consider the following types of changes to be "major changes", which require public input and a Title VI equity analysis in compliance with FTA's Circular 4702.1B

- a) The Addition of Service;
- b) A proposed service level reduction in miles, hours, or trips of thirty three percent (33%) or more of any route;
- c) The elimination of all service during a time period (peak, midday, evening, Saturday, or Sunday);
- d) A proposed twenty-five (25%) or greater change in route alignment;
- e) A proposed fare change.

Evaluation and Analysis of Service and Fare Changes

- 1. UTA will analyze proposed major changes to service and any proposed fare changes in accordance with FTA's Circular C 4702.1B as amended.
- 2. UTA will evaluate the impacts of all major service changes cumulatively when there is more than one route being affected for a service change period
- 3. UTA will primarily utilize American Community Survey (ACS) Data, block group data and/ or ridership data to evaluate and analyze any proposed major service and fare changes. This data will be analyzed with Geographic Information System (GIS) software.

4. UTA will rely on population data and use the smallest geographic area that reasonably has access to the stop or station effected by the proposed major service change. This will be translated into a one-quarter mile radius to a bus stop, one-half mile to a light rail station and three miles to a commuter rail station.

Disparate Impact and Disproportionate Burden

1. UTA will measure the burdens of service and fare changes on minority riders to determine when minority riders are bearing a disparate impact from the change between the existing service or fare and the proposed service or fare.
2. UTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service or fare and the proposed service or fare.
3. A threshold of 5% will be used to determine disparate impact on minority populations and disproportionate burden on low-income populations. This 5% is based on the margin of error from the US Census data that UTA uses to determine the populations in the service area. This means that if the burden of the service or fare change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, then the change will be considered either a disparate impact or a disproportionate burden.

Finding a Disparate Impact

1. At the conclusion of UTA's Analysis, if UTA finds a disparate impact on the basis of race, color, or national origin, UTA shall seek to modify the proposed changes in a way that will mitigate the adverse effects that are disproportionately borne by minorities. Modifications made to the proposed changes must be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts.
2. If UTA chooses not to alter the proposed services changes despite the potential disparate impact on minority populations, or if UTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service or fare change, UTA may implement the change only if:
 - a. UTA has substantial legitimate justification for the proposed change; and
 - b. UTA can show that there are no alternatives that would have a less disparate impact on the minority riders but would still accomplish the transit provider's legitimate program goals. In order to show this, UTA must consider and analyze alternatives to determine whether those alternatives would have less of a

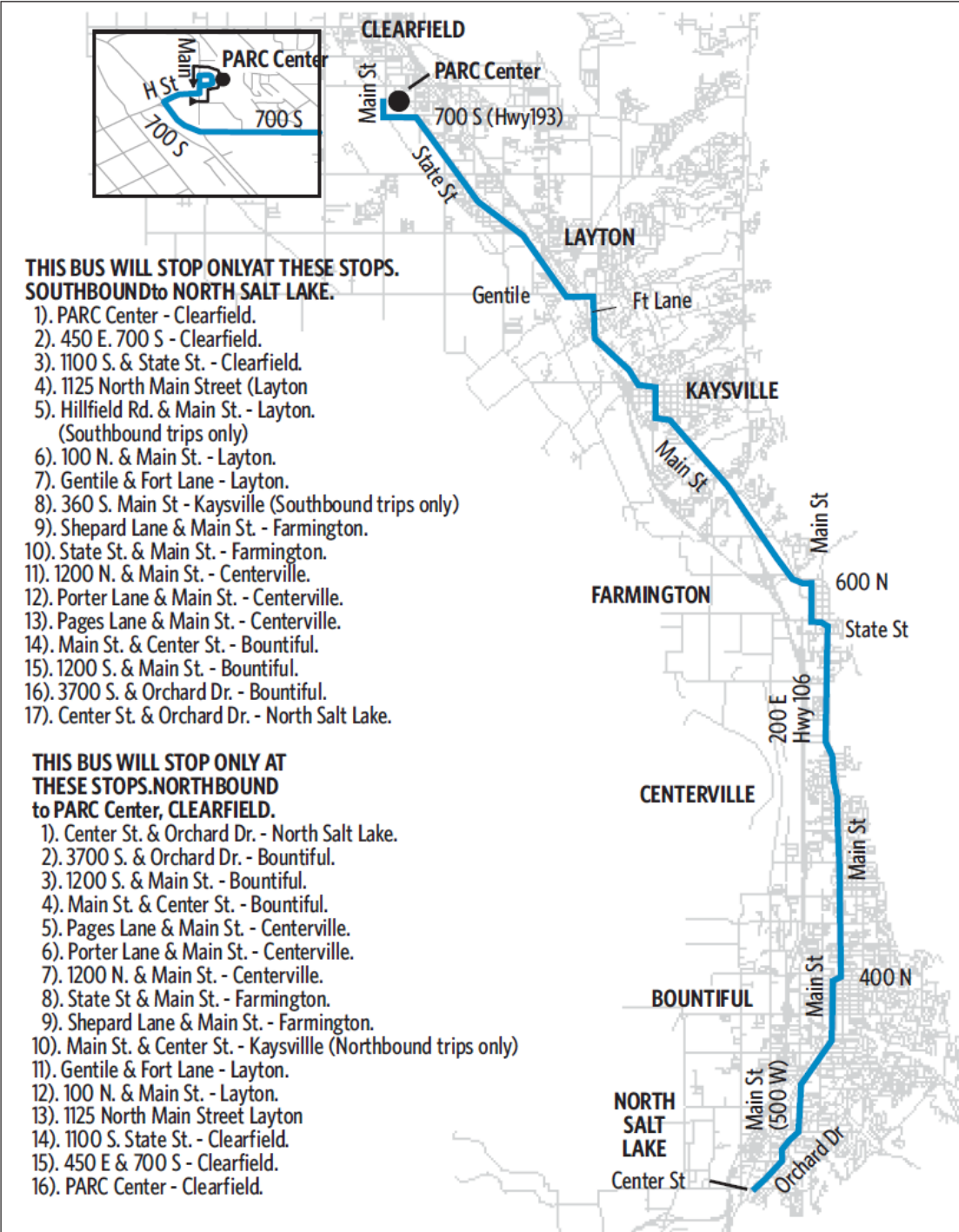
disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative

Finding a Disproportionate Burden

If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. UTA will also describe alternatives available to low-income passengers affected by the service changes.

Proposed Changes

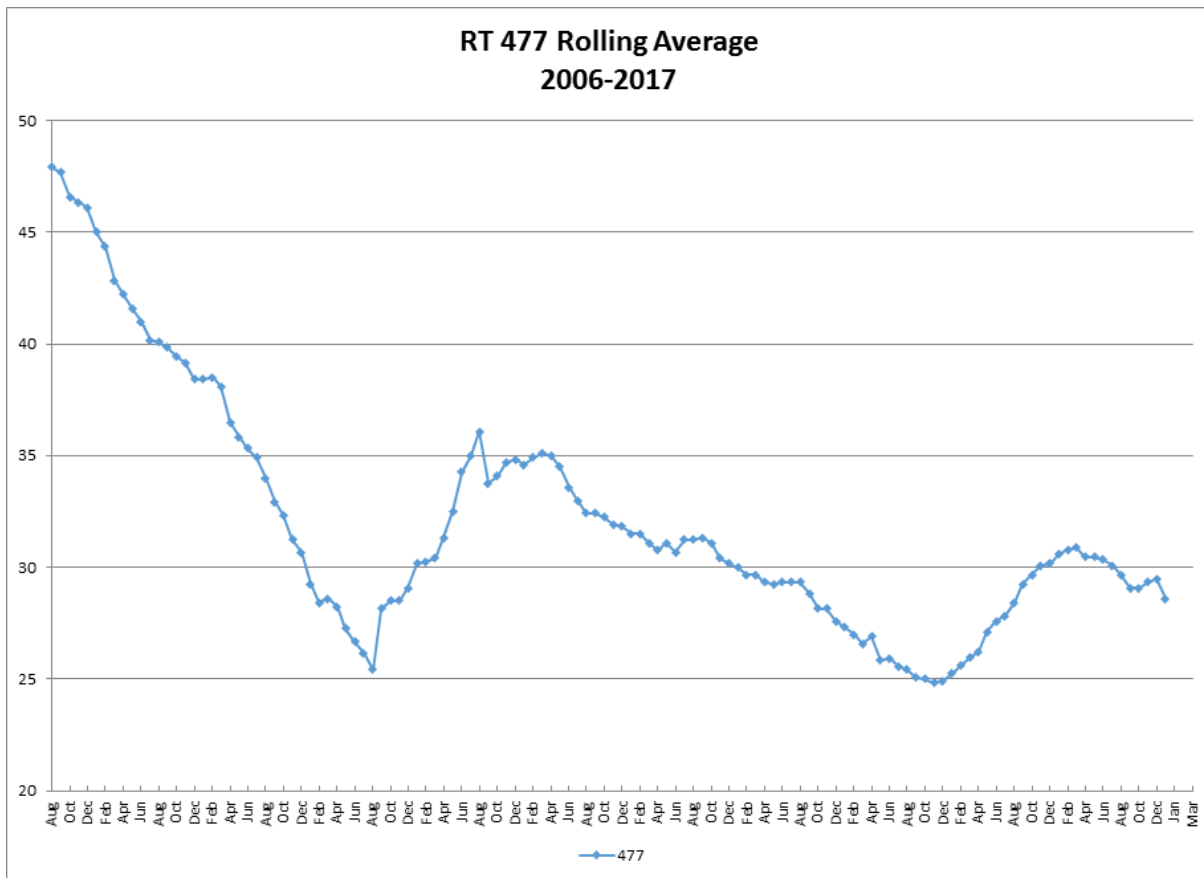
Route 477



Route 477 makes two trips every weekday and does not run weekend service. The first trip departs from Center & Orchard Dr. in North Salt Lake at 7:55 AM and concludes at PARC Center at 9:02 AM. The second trip departs from PARC Center at 3:05 pm and concludes at Center & Orchard Dr. at 4:04 PM.

The original intent of route 477 was to provide service to those who participate in Pioneer Adult Rehabilitation Center (PARC). PARC provides services to people with disabilities along the Wasatch Front. Route 477 was created when Davis County school buses stopped providing transportation. When Davis County discontinued its service, the paratransit services at the time did not have capacity to accommodate the number of riders needing transportation, which prompted a fixed-route solution. This is why route 477 only runs once in the morning heading north to PARC and once south from PARC in the evening with no weekend service.

Since the formation of the route, roughly half of the participants at PARC have transferred to paratransit and ridership has declined. The average ridership for calendar year 2016 is 30 per day compared to 46 when the route was first created in August of 2005. See the line graph below for a month-by-month breakdown of route utilization over an 11 year period.



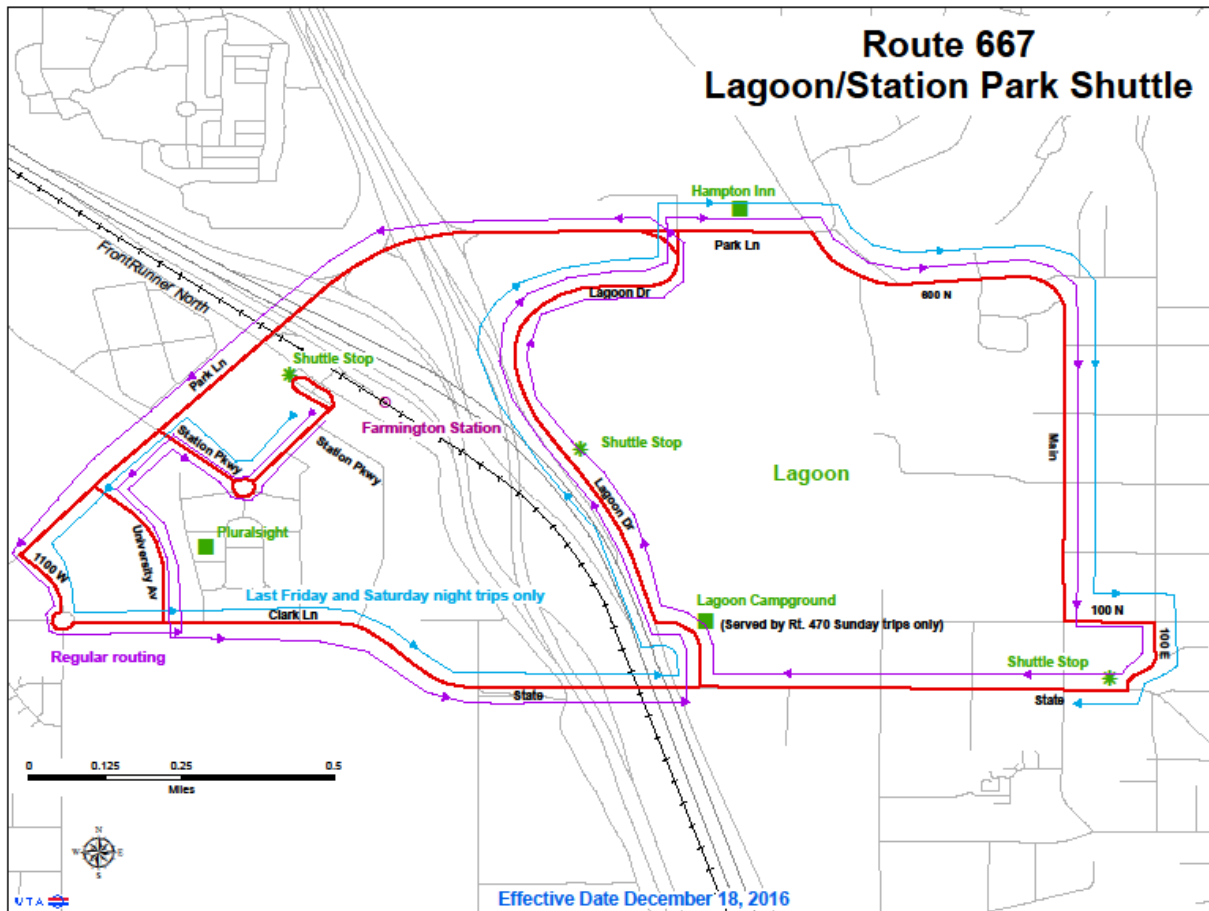
At the request of PARC, a meeting was held between UTA and PARC on October 24, 2016 to discuss public transit options for those who were participating in their services. Through this discussion it was determined that riders who use route 477 to get to PARC may be best served through paratransit services rather than the fixed-route services. UTA and PARC reviewed participant ridership and determined all present riders would be eligible for paratransit. UTA and PARC proceeded to conduct a public outreach campaign to gather input from riders and relevant caretakers as to whether paratransit would more adequately address the needs of 477 riders. PARC took responsibility to ensure that all effected participants were informed of the change and assisted with the paratransit eligibility process.

Public Outreach

The public comment period for this change was from January 5 to February 5 of 2017. Notice was listed on UTA's website, Utah.gov, the Ogden Standard Examiner and the Davis County Clipper, both local newspaper. Comments were accepted via mail, email, at the public hearing and by phone. The public hearing was held on January 19th, 2017. It was publicized by and held at the PARC facility. Seven people attended this meeting and there was no opposition to the proposed changes. One respondent was somewhat supportive, but offered alternative proposals. This information was provided to planning for consideration.

In addition to the public hearing and public comment period, all known riders' care providers were identified and directly contacted by UTA's Special Services Business Unit.

Route 667



Route 667 is a free fare shuttle from the Farmington FrontRunner station, Station Park shopping complex, Lagoon amusement park, The Hampton Inn, and downtown Farmington in a figure 8 loop. The purpose of this route is to connect riders to recreational facilities from easily accessible locations. To better accomplish this purpose, UTA has proposed to modify the schedule to provide better transfers to and from FrontRunner and to spread passenger loads across route 667 trips. The proposed changes would eliminate service to downtown Farmington in the AM and PM peak periods, and every 60 minutes during the mid-day.

This route's fare is a sponsored fare, meaning that the individual riders are not required to pay fare to ride. The sponsorship is led by Farmington City who seeks partners who benefit from the shuttle and to contribute a portion of the costs.

The table below shows the stops on Route 667 that have a proposal to decrease the headways and fall out the downtown Farmington Loop. The time frame for both tables' average boardings

are calculated using the data from June 2016 through August 2016. This time frame was selected because it is the time frame when the route is used most and would have the most impact on riders and little data exists for off-season running since it had not run off season trips until after August 2016.

Name of Stop <i>Decreasing</i> Frequency	Average Weekday Boardings	Average Saturday Boardings
105001 MAIN ST 479 N	0.00	0.00
105003 MAIN ST 305 N	0.00	0.00
106001 STATE ST 398 W	0.00	0.00
107064 STATE ST 108 W	0.00	0.00
107065 STATE ST 220 W	0.00	0.00
301012 STATE ST 45 E	0.33	1.00
301333 600 N 111 W	0.14	0.00
301410 PARK LN 331 W	0.48	0.91

The following table shows those stops that fall on the Lagoon, FrontRunner and Park Station loop and will have proposed increased headways.

Name of Stop <i>Increasing</i> Frequency	Average Weekday Boardings	Average Saturday Boardings
105021 LAGOON DR 375 N	97.31	169.45
106007 100 N 873 W	0.00	1.56
106008 STATE ST 720 W	0.04	0.22
301055 450 N 850 W	266.98	542.00
301056 850 W 450 N	12.14	26.73
301313 PARK LN 189 N	0.00	0.00
301422 UNION AVE 184 N	2.00	0.00
301423 UNION AVE 185 N	0.81	0.89

According to the route 667 bus stop level ridership information above, Lagoon is the largest market draw on the route and there is very little ridership on Main Street in downtown Farmington. In addition, there is large growth potential at the Station Park and University of Utah hospital stations. The proposed schedule changes aim to improve the transit experience for the biggest markets and increase connectivity timing to the FrontRunner schedule, while still providing some level of service to downtown Farmington.

Even with shortening the route on selected trips throughout the day, the 667 still can't meet every train perfectly. The revised schedule is based on observed travel patterns and available ridership data.

Public Outreach

The public comment period for this change was from January 5 to February 5 of 2017. Notice was listed on UTA's website, Utah.gov, the Ogden Standard Examiner and the Davis County Clipper, both local newspaper. The public hearing was held on January 19th, 2017. Comments were accepted via mail, email, at the public hearing, phone and Open UTA which is an online forum for discussion. The public outreach hearing was held January 26th, 2017 at the Farmington City Hall. In addition to this, there was direct contact with Farmington City, Station Park, Lagoon, Hampton Inn and the University Medical Center in the region.

Response from Farmington City and local businesses were all positive and 50% of community members were in support of the changes. 50% of community responses were opposed. The three respondents in opposition to the changes expressed concern regarding access to Lagoon and downtown Farmington locations during peak times. Alternative routes, specifically routes 455 and 470, are able to provide transportation to the specified locations. One respondent suggested running a second route to downtown or having the 667 resume a more frequent downtown schedule during Lagoon's off-season. UTA Planning is considering both options for future proposed changes.

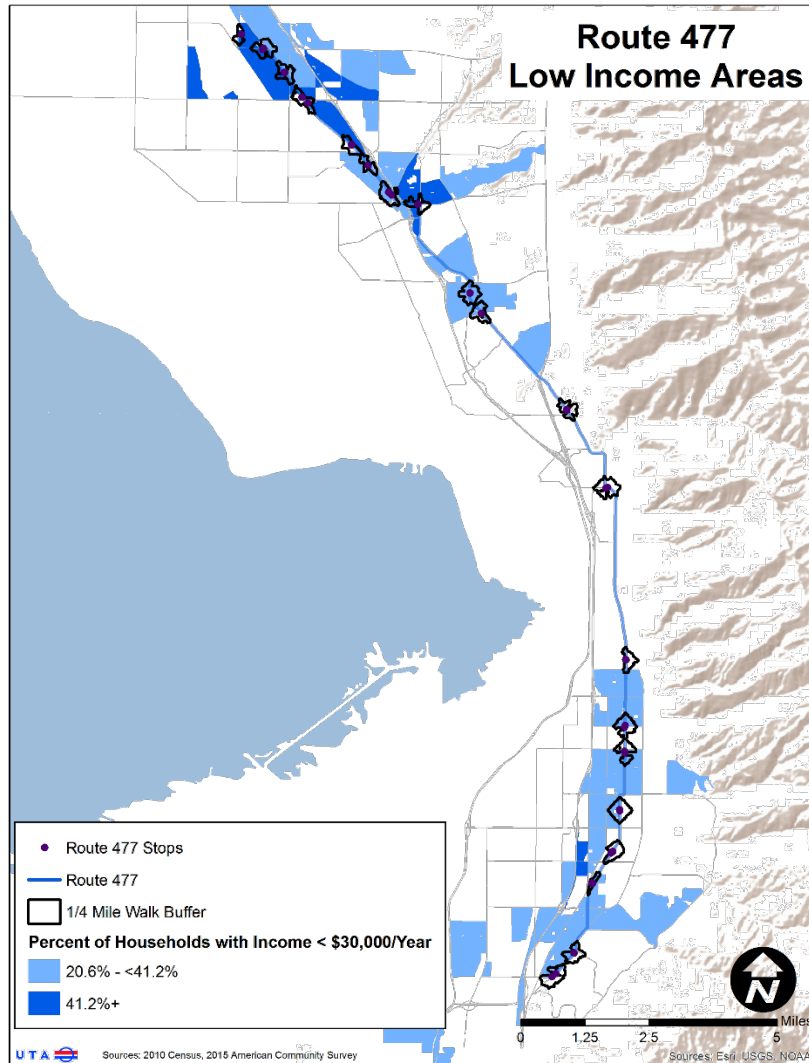
Analysis of Proposed Changes

UTA is required to analyze the potential impacts of any major service change as it relates to Low-income populations and minority populations. Pursuant to this requirement, UTA has created the following maps, tables and related data. The data in this section was compiled utilizing American Community Survey (ACS) 2011-2015 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups. This was done in order to use the smallest geographic area possible for the analysis. The distribution was dictated by population ratios from 2010 Census Data. Analysis was done based on the stops of the route. All stops have had a one quarter mile radius applied to them based on the actual accessibility of the route by road. Any census block that is overlapped by this “walkability radius” has its population included as those effected by the proposed changes. These aggregated numbers are compiled as a comparison group to the service area average to determine disparate impact and disproportionate burden.

The maps in this section will show the route, individual stops with a walkability radius, and census blocks with concentrations of low-income households or minority individuals above the system average, which are shaded according to density.

Route 477

Low-Income Analysis



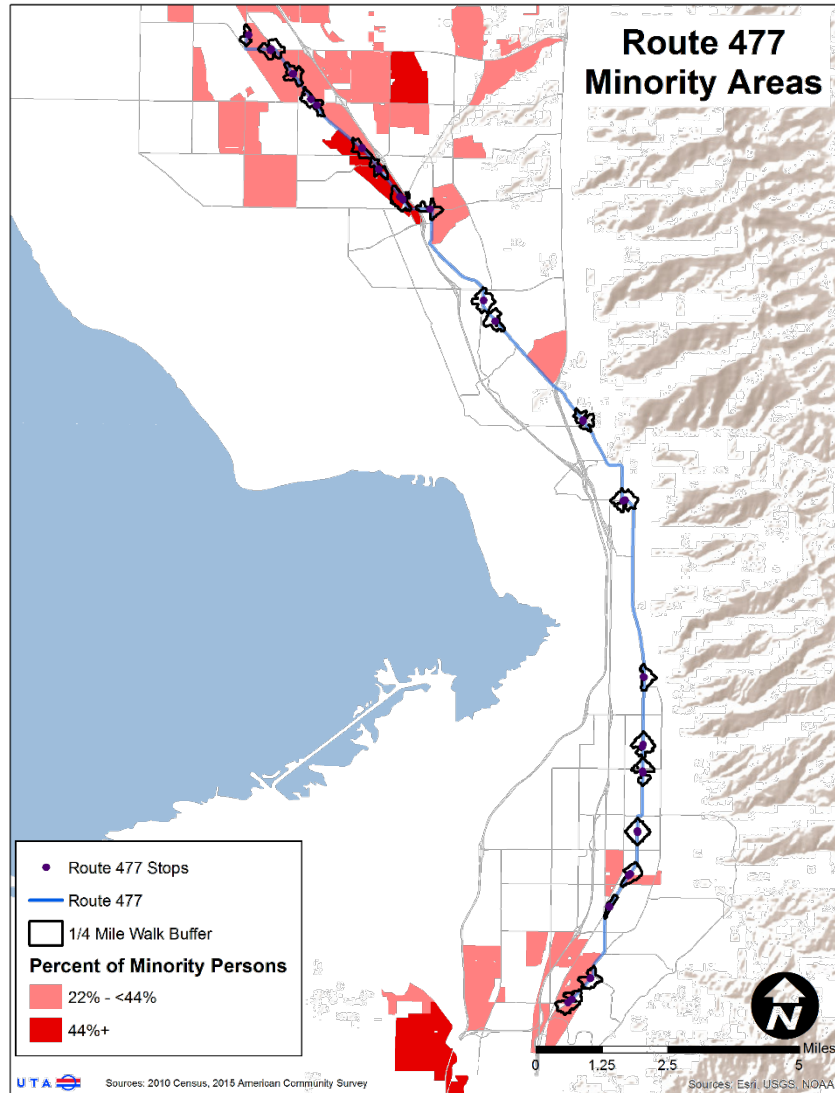
The total effected population by the proposed elimination compared to the system average are shown below in tabular format below.

<i>Low-Income System Average:</i>	
Number of Households:	703,314
Low-Income Households:	144,649
Percent Low-income:	20.6%

<i>Route 477:</i>	
Number of Households:	8,904
Low-Income Households:	2,175
Percent Low-income:	24.4% (+3.8%)

As expressed in the table above, the total low-income households negatively impacted by this elimination is 3.8% greater than the system average. This is still below the 5% threshold.

Minority Analysis



The total effected population by the proposed elimination compared to the system average are shown below in tabular format below.

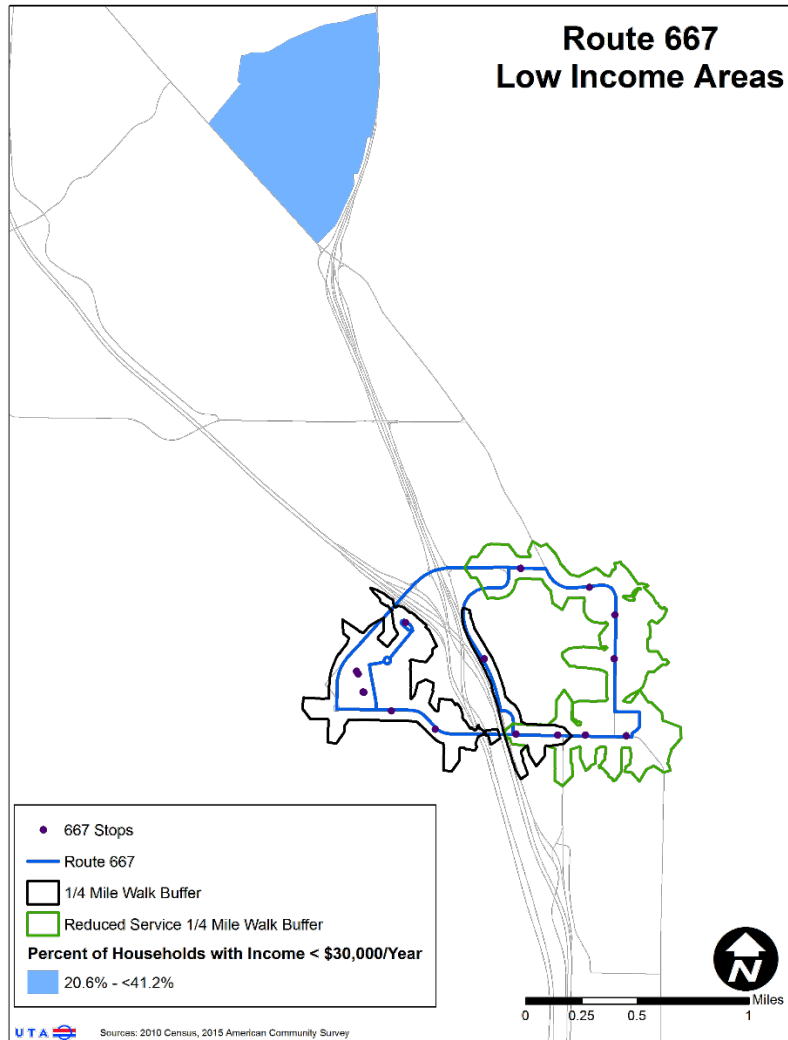
<i>Minority System Average:</i>	
Population:	2,273,056
Minority Population:	499,458
Percent Minority:	21.97%

<i>Route 477:</i>	
Population:	25,202
Minority Population:	4,032
Percent Minority:	19.1% (-2.87%)

As expressed in the table above, the low-income households negatively impacted by this elimination is 2.87% below the system average.

Route 667

Low-Income Analysis



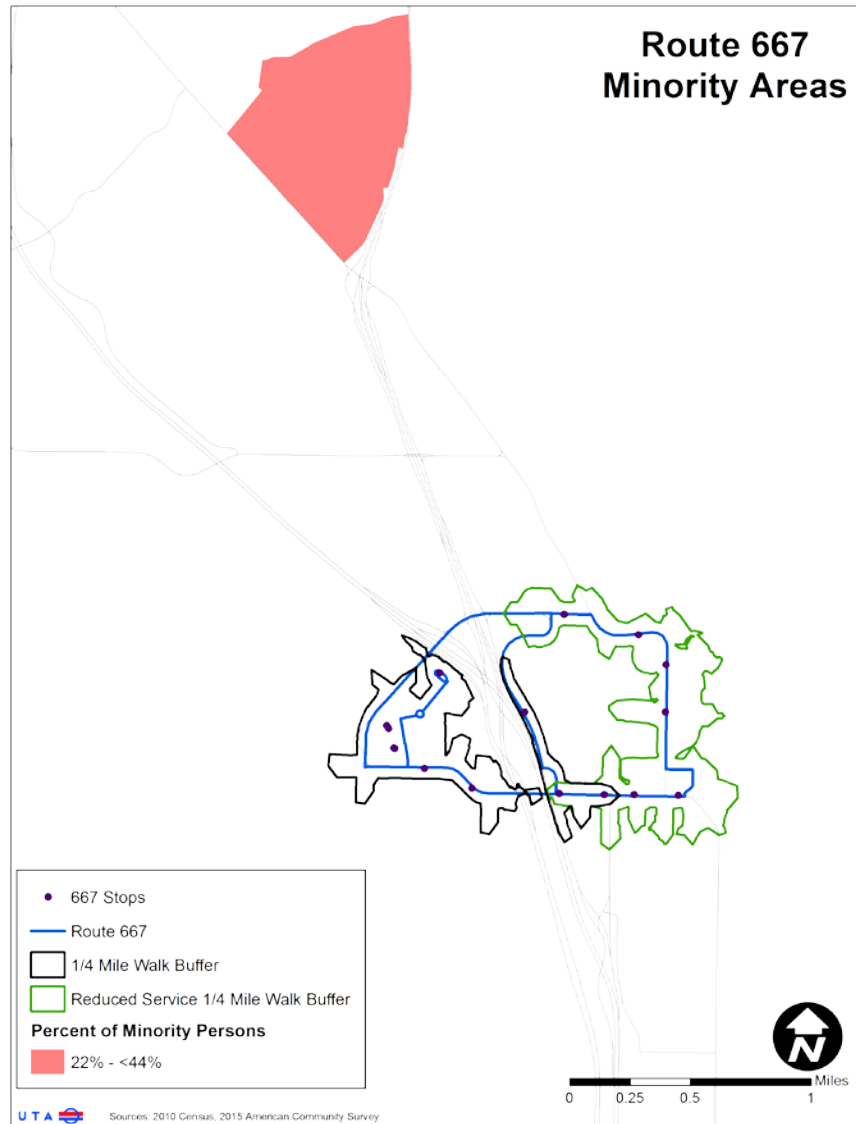
The total effected population by the proposed elimination compared to the system average are shown below in tabular format below.

<i>Low-Income System Average:</i>	
Number of Households:	703,314
Low-Income Households:	144,649
Percent Low-income:	20.6%

<i>Route 667:</i>	
Number of Households:	717
Low-Income Households:	69
Percent Low-income:	9.6% (-11%)

As expressed in the table above, the total low-income households negatively impacted by this elimination is 11% below the system average.

Minority Analysis



The total effected population by the proposed elimination compared to the system average are shown below in tabular format below.

<i>Minority System Average:</i>	
Population:	2,273,056
Minority Population:	499,458
Percent Minority:	21.97%

<i>Route 667:</i>	
Population:	3,213
Minority Population:	175
Percent Minority:	5.4% (-16.57%)

As expressed in the table above, the low-income households negatively impacted by this elimination is 16.57% below the system average.

Findings of Analysis

Route 477

There were no disparate impacts or disproportionate burden found in the analysis of this service change. While there were more low-income households in the area impacted by these changes than the system average, it did not exceed the 5% threshold that would require additional steps to minimize, mitigate or offset the adverse effects.

In spite of not having negative impacts to minority or low-income populations beyond the 5% threshold, there was still concern regarding the riders of this route who had disabilities. UTA has been sensitive to the needs of those riders, which is why there was more outreach than is typical for a standard change. UTA collaborated with PARC to be as inclusive of those impacted as possible and to hear their concerns. All riders were offered and qualified for paratransit services. Since Utah's Division of Services for People with Disabilities (DSPD) is paying the cost of transportation, there is no increased cost to the individual rider and feedback received through public outreach was overall positive. The replacement service of paratransit will provide a more personalized experience to the individuals. After reviewing all of these factors, UTA does not feel that these changes will negatively impact riders, but will likely make their transportation experience better.

Route 677

There were no disparate impacts or disproportionate burden found in the analysis of this service change. The proposed changes will take place in a predominantly non-minority and non-low-income area.



**Report of the Meeting
of the
Board of Trustees of the Utah Transit Authority (UTA)
held at UTA FrontLines Headquarters located at
669 West 200 South, Salt Lake City, Utah
March 22, 2017**

Board Members Present:

Robert McKinley, Chair
Sherrie Hall Everett, Vice Chair
Jeff Acerson
Cortland Ashton
Keith Bartholomew
Necia Christensen
Karen Cronin

Babs De Lay
Charles Henderson
Dannie McConkie
Bret Millburn
Brent Taylor
Troy Walker

Board Members Excused/Not in Attendance: Greg Bell, Jeff Hawker, Michael Romero

Also attending were members of UTA staff, as well as interested citizens and media representatives.

Welcome and Call to Order. Chair McKinley welcomed attendees and called the meeting to order at 1:37 p.m. with eleven voting board members present. The board and meeting attendees then recited the Pledge of Allegiance.

Safety Minute. Chair McKinley yielded the floor to Dave Goeres, UTA Chief Safety, Security & Technology Officer, for a brief safety message.

General Public Comment Period. In-person public comment was given by George Chapman.

Resolution: R2017-03-01: 2016 Performance Report.

Presentation of Item. Jerry Benson, UTA President/CEO, delivered a presentation on the agency's 2016 performance, covering progress on reforms, general accomplishments, financial performance, and performance against board goals.

Public Input. One comment was received online and was read in the meeting by Robert Biles acting in his capacity as secretary of the board. In-person comment was given by George Chapman.

Trustee Millburn joined the meeting at 2:17 p.m.

Board Discussion and Decision/Action. Chair McKinley asked if any trustees had a reason to recuse themselves from discussing or voting on this item. No trustees indicated any conflicts. Discussion ensued. Questions were posed by the board and answered by Mr. Benson. Trustee Bartholomew requested time at the board retreat to discuss metrics that favor the agency's values. Trustee Henderson expressed concern with awarding the partial percentage recommended by staff on the revenue goal. A motion to approve the resolution was made by Trustee De Lay and seconded by Trustee Walker. Further discussion ensued. Trustee Henderson proposed that the motion be amended to approve the resolution replacing the partial completion on the revenue goal with the percentage of actual revenue awarded in 2016. Trustee De Lay agreed to amend her motion. Trustee Taylor expressed opposition to UTA's performance incentive program. Chair McKinley counseled Trustee Taylor that his concerns about the performance incentive program would be better addressed at the retreat because the program itself is "not being reviewed at this point." He said the question at hand is what percentage should be applied to the 2016 performance incentive program already approved. Trustee Taylor stated that he would like to provide his rationale for a substitute motion. He then expressed concern with hiring lobbyists. Chair McKinley interjected that a discussion on lobbyists was not relevant to the current topic and asked Trustee Taylor to restrict his comments to the performance incentive program. Trustee Taylor opined that ridership should be a major factor in performance incentive awards and also mentioned discomfort with the points awarded for public trust and asked that the factor be reconsidered. He expressed further discomfort with the "size and scope" of the performance incentive program. Trustee Taylor made a substitute motion to eliminate the performance incentive program for 2016 and in the future. There was no second on the motion and Chair McKinley declared the motion dead.

More discussion ensued. Trustee De Lay requested additional information on the performance incentive program in the future. Chair McKinley indicated the performance incentive program is part of the board's upcoming workshop agenda. Mr. Benson stated that the executive team is doing a thorough review of UTA's compensation program generally and requested the opportunity to present a newly aligned compensation program to the board later in the year. An amended motion to approve resolution with an accomplishment award of 77.7 percent from an available amount of \$914,435.86 was made by Trustee De Lay and seconded by Trustee Walker. The motion carried by majority consent with one nay vote from Trustee Taylor.

Presentations/Informational Items.

2017 Risk Assessment Process. UTA Chief of Internal Audit Riana De Villiers delivered a presentation on the internal audit risk assessment process including internal audit responsibilities and plan development.

Public Hearing Report – April Change Day. A report on the April Change Day was given by staff. UTA Regional Manager of the Mount Ogden Business Unit Eddy Cumins covered two route changes in Davis County, UTA Public Hearing Officer Erika Shubin summarized public outreach on the changes, and UTA Civil Rights Compliance Officer Andrew Gray reviewed the Title VI analysis. During the presentation questions were posed by the board and answered by staff. Trustee Taylor requested that the current version of the presentations given in board meetings be included in the packet.

Closed Session. Chair McKinley indicated that a change was needed to the order of the agenda and asked for a motion to go into closed session to discuss matters related to pending litigation. A motion to move into closed session was made by Trustee Christensen and seconded by Trustee Millburn. The motion was approved by unanimous consent and the board moved into closed session at 3:27 p.m.

Open Session. A motion to return to open session was made by Trustee Millburn and seconded by Trustee De Lay. The motion carried by unanimous consent and the board returned to open session at 4:43 p.m.

Action Taken Regarding Matters Discussed in Closed Session.

Legal Agreement. A motion to approve the agreement as presented during closed session was made by Vice Chair Everett and seconded by Trustee Bartholomew. The motion carried by majority consent with one nay vote from Trustee Taylor.

Trustee De Lay left the meeting at 4:46 p.m.

Board Member Event Participation. Chair McKinley asked that this item be deferred to the April agenda in the interest of time.

Board Workshop Pre-Work and Milestone Timeline of Activity. Trustee Henderson asked trustees to visit with their appointing authorities and use the questions outlined in the meeting packet to prompt a dialog. He encouraged trustees to engage in and complete the pre-work in order to maximize the time available during the board workshop. Trustee Henderson asked if any trustee had an objection to forming a strategic plan with a horizon of 20 years. No objections were raised.

Utah Legislative Session Overview. Chair McKinley asked that this item be deferred to the April agenda in the interest of time.

Items for Consent. Consent items were comprised of the following:

- Approval of February 22, 2017 Meeting Report
- Title VI Equity Analysis of April Service Changes
- CEO Performance Plan

A motion to approve the consent items was made by Trustee Christensen and seconded by Trustee Walker. The motion carried by unanimous consent.

Other Business.

Board Process Policy 4.4.1 – Actual and Potential Conflicts of Interest. This item was deferred to the April agenda.

SB174 Legislative Task Force Appointment. Chair McKinley stated that during the legislative session SB174 was passed. One of the provisions of the bill sets up a legislative task force to review governance of the state's transportation agencies and UTA was given one appointment. Chair McKinley recommended Trustee Millburn to represent the agency on the task force. No motion was required on this item, but the board voted to affirm the appointment by majority consent with ten aye votes and one abstention by Trustee Millburn.

Adjournment. The meeting was adjourned at 4:55 p.m. by motion.

Transcribed by Cathie Griffiths
Assistant to the President/CEO
Utah Transit Authority
cgriffiths@rideuta.com
801.237.1945

[Video](#) and [audio](#) recordings of this meeting are posted online.

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING
AUGUST CHANGE DAY TITLE VI EQUITY ANALYSIS**

No. R2017-06-02

June 28, 2017

WHEREAS, the Utah Transit Authority (the "Authority") is a public transit district organized under the laws of the State of Utah and was created to transact and exercise all of the powers provided for in the Utah Limited Purpose Local Government Entities-Local Districts Act and the Utah Public Transit District Act; and

WHEREAS, the Board of Trustees of the Authority (the "Board"), in keeping with the Federal Transit Administration's requirements for public transit agencies and the Civil Rights Act of 1964, desires to review and approve the Authority's August Change Day Title VI Equity Analysis; and

WHEREAS, the Board has determined that approval of the Title VI Equity Analysis will be beneficial to the Authority and the service area; and

WHEREAS, the Board has considered and reviewed the Title VI Equity Analysis prepared by Authority staff, and now desires to approve the same.

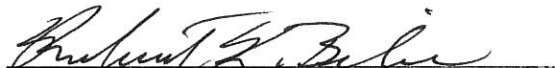
NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Utah Transit Authority:

1. That the August Change Day Title VI Equity Analysis prepared by Authority staff, a copy of which is attached hereto as Exhibit A, is hereby approved by the Authority.
2. That the Board formally ratifies prior actions taken by the Authority, including those taken by the President/CEO, and staff that were necessary or appropriate to prepare and submit the Title VI Equity Analysis.
3. That a copy of this Resolution shall be submitted to the Federal Transit Administration.
4. That the corporate seal shall be affixed hereto.

APPROVED AND ADOPTED this 28th day of June, 2017


Robert W. McKinley, Chair

ATTEST:

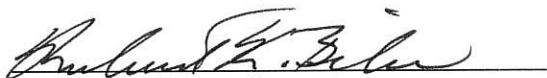

Robert K. Biles, Secretary
[SEAL]



CERTIFICATE

The undersigned duly qualified Chair of the Board of Trustees of the Utah Transit Authority certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Board held on the 28th day of June, 2017.


Robert W. McKinley, Chair


Robert K. Biles, Secretary

Approved as to Form


Legal Counsel

EXHIBIT A

Copy of Title VI Equity Analysis



Title VI Service Equity Analysis

August 2017

Utah Transit Authority

Prepared by: Andrew Gray

Graphics and Data: Joseph Taylor and James Wadley

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Utah Transit Authority has committed to the Federal Transit Administration (FTA) Title VI objectives set forth in Circular 4702.1B ensuring that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.

The following analysis is of proposed changes to be implemented on August 13 of 2017. These changes are being proposed to improve service delivery throughout the system. Though the proposed changes are facially neutral, this analysis, in accordance with FTA requirements, will ensure that these changes will not have disproportionate and negative impacts on minority and low-income populations within UTA's service area. If these changes are found to be discriminatory, UTA will take all prudent steps necessary to ensure services are equitable and compliant with federal guidelines and requirements.

Summary of Proposed Changes

Route 664 & 665 – Cancellation of Routes:

Routes 664 and 665 are a connection route between the Layton Frontrunner Commuter Rail station and Hill Airforce Base during peak hours. It is proposed to eliminate these routes due to low ridership. The elimination of service constitutes a major change.

Route 809 – Addition of Route:

The proposed creation of Route 809 is to be a new fixed route to provide local, limited service between Pleasant Grove and the American Fork FrontRunner Station. There will be two trips running in the morning from Pleasant Grove to the American Fork FrontRunner station, then two trips in the afternoon from the American Fork FrontRunner to Pleasant Grove. The addition of services is considered a major change.

Route 627 – Addition to Route:

The route 627 proposal includes extending the north section of the route from Weber State Davis Campus to the Clearfield Commuter Rail Station, where it will connect with the 626. This addition would constitute a change of over twenty-five percent of the current route alignment, which constitutes a major change.

UTA Policy and Definitions

UTA has developed corporate policy 1.1.28 Title VI Compliance Policy to evaluate the impacts of proposed major services changes on minority and low-income populations. The following policy references refer to subsections of the aforementioned corporate policy and were created to ensure that all equity analyses are performed using the same parameters.

Public Input on UTA Policy

In order to create UTA's Title VI Compliance Policy, which describes how UTA will determine disparate impact on minority populations and disproportionate burden on low-income populations, UTA sought public involvement per FTA Circular 4702.1b requirements. To solicit feedback from the public, UTA advertised a public notice in local newspapers in the service area. The notice and draft policy was posted on UTA's website, rideuta.com, as well as on the Utah state government's website, Utah.gov, under "Public Notices". The state website provides 35 language translation options. An email notification was sent out by the Salt Lake County Office of Diversity Affairs, which maintains an email list that goes to anyone interested in diversity issues. Additional targeted outreach was done, which included mailing a letter and the policy or sending emails to community organizations that work with minority or low-income populations.

Definitions

- A. *"Disparate Impact"* refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the UTA's policy or practice lacks a substantial, legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- B. *"Disproportionate Burden"* refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.
- C. *"Low-income Population"* refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/ transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.
- D. *"Low-income person"* refers to a person whose median household income is at or below 150% of the U.S. Department of Health and Human Services (HHS) poverty guidelines. UTA utilizes American Community Survey (ACS) poverty data to determine low-income status when utilizing population data.

- E. *"Minority Person"* includes the following:
1. American Indian or Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
 5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- F. *"Minority Population"* means any readily identifiable group of minority persons who live in geographic proximity.
- G. *"National Origin"* means the particular nation in which a person was born, or where the person's parents or ancestors were born.
- H. *"System Average"* The system average is the averages of minorities and low-income persons within the total populous of the geographic regions that UTA serves. The present system averages are expressed below in tabular format using 2011-2015 5-year population estimates provided by American Community Survey (ACS) data.

<i>Low-Income System Average:</i>	
Population:	2,243,746
Low-Income Population:	457,949
Percent Low-income:	20.4%

<i>Minority System Average:</i>	
Population:	2,277,445
Minority Population:	499,870
Percent Minority:	21.9%

Major Service Change Definition

UTA will consider the following types of changes to be "major changes", which require public input and a Title VI equity analysis in compliance with FTA's Circular 4702.1B

- a) The Addition of Service;
- b) A proposed service level reduction in miles, hours, or trips of thirty three percent (33%) or more of any route;
- c) The elimination of all service during a time period (peak, midday, evening, Saturday, or Sunday);

- d) A proposed twenty-five (25%) or greater change in route alignment;
- e) A proposed fare change.

Evaluation and Analysis of Service and Fare Changes

1. UTA will analyze proposed major changes to service and any proposed fare changes in accordance with FTA's Circular C 4702.1B as amended.
2. UTA will evaluate the impacts of all major service changes cumulatively when there is more than one route being affected for a service change period
3. UTA will primarily utilize American Community Survey (ACS) Data, block group data and/or ridership data to evaluate and analyze any proposed major service and fare changes. This data will be analyzed with Geographic Information System (GIS) software.
4. UTA will rely on population data and use the smallest geographic area that reasonably has access to the stop or station effected by the proposed major service change. This will be translated into a one-quarter mile radius to a bus stop, one-half mile to a light rail station and three miles to a commuter rail station.

Disparate Impact and Disproportionate Burden

1. UTA will measure the burdens of service and fare changes on minority riders to determine when minority riders are bearing a disparate impact from the change between the existing service or fare and the proposed service or fare.
2. UTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service or fare and the proposed service or fare.
3. A threshold of 5% will be used to determine disparate impact on minority populations and disproportionate burden on low-income populations. This 5% is based on the margin of error from the US Census data that UTA uses to determine the populations in the service area. This means that if the burden of the service or fare change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, then the change will be considered either a disparate impact or a disproportionate burden.

Finding a Disparate Impact

1. At the conclusion of UTA's Analysis, if UTA finds a disparate impact on the basis of race, color, or national origin, UTA shall seek to modify the proposed changes in a way that will mitigate the adverse effects that are disproportionately borne by minorities.

Modifications made to the proposed changes must be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts.

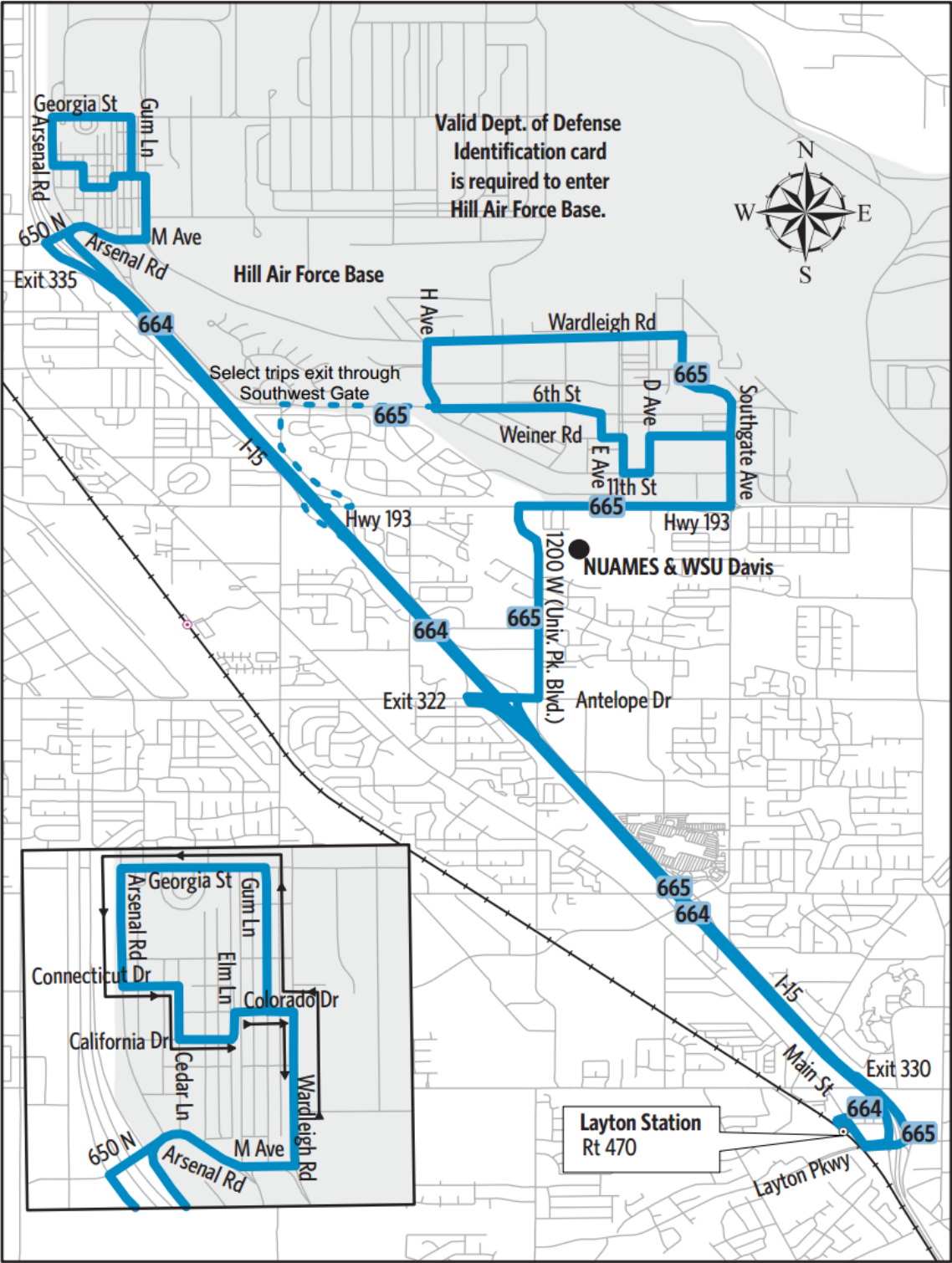
2. If UTA chooses not to alter the proposed services changes despite the potential disparate impact on minority populations, or if UTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service or fare change, UTA may implement the change only if:
 - a. UTA has substantial legitimate justification for the proposed change; and
 - b. UTA can show that there are no alternatives that would have a less disparate impact on the minority riders but would still accomplish the transit provider's legitimate program goals. In order to show this, UTA must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative

Finding a Disproportionate Burden

If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. UTA will also describe alternatives available to low-income passengers affected by the service changes.

Proposed Changes

Routes 654 and 655



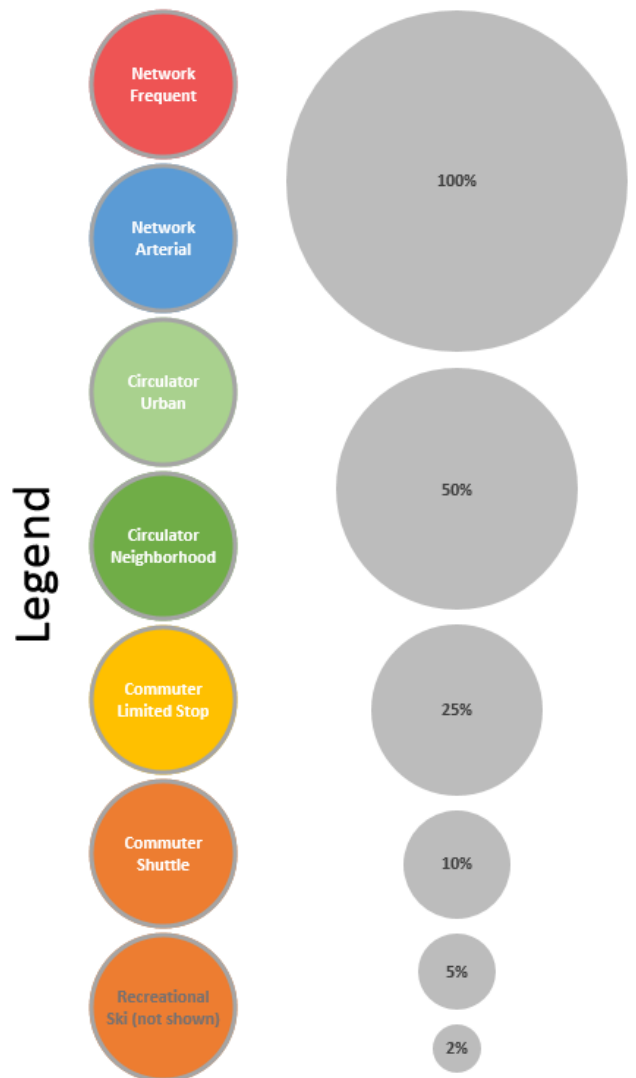
Routes 664 and 665 are commuter-focused routes within the Ogden Business Unit that each run six trips from the Layton FrontRunner station to Hill Airforce Base in the morning and five trips from Hill Airforce Base to the Layton FrontRunner station in the afternoon. The primary focus of this route is to provide transportation to those working on base. Any stops inside of the base require passage through a guard station where credentials must be presented to gain access, which includes the operator.

Low ridership relative to the cost of service has been the influential factor in the decision to propose the complete cancellation of these two routes. There is greater ridership on route 665, which can be attributed to a 2014 addition of service to Weber State University Davis. WSU Davis has several other routes which can replace the service left by the cancellation of the 665.

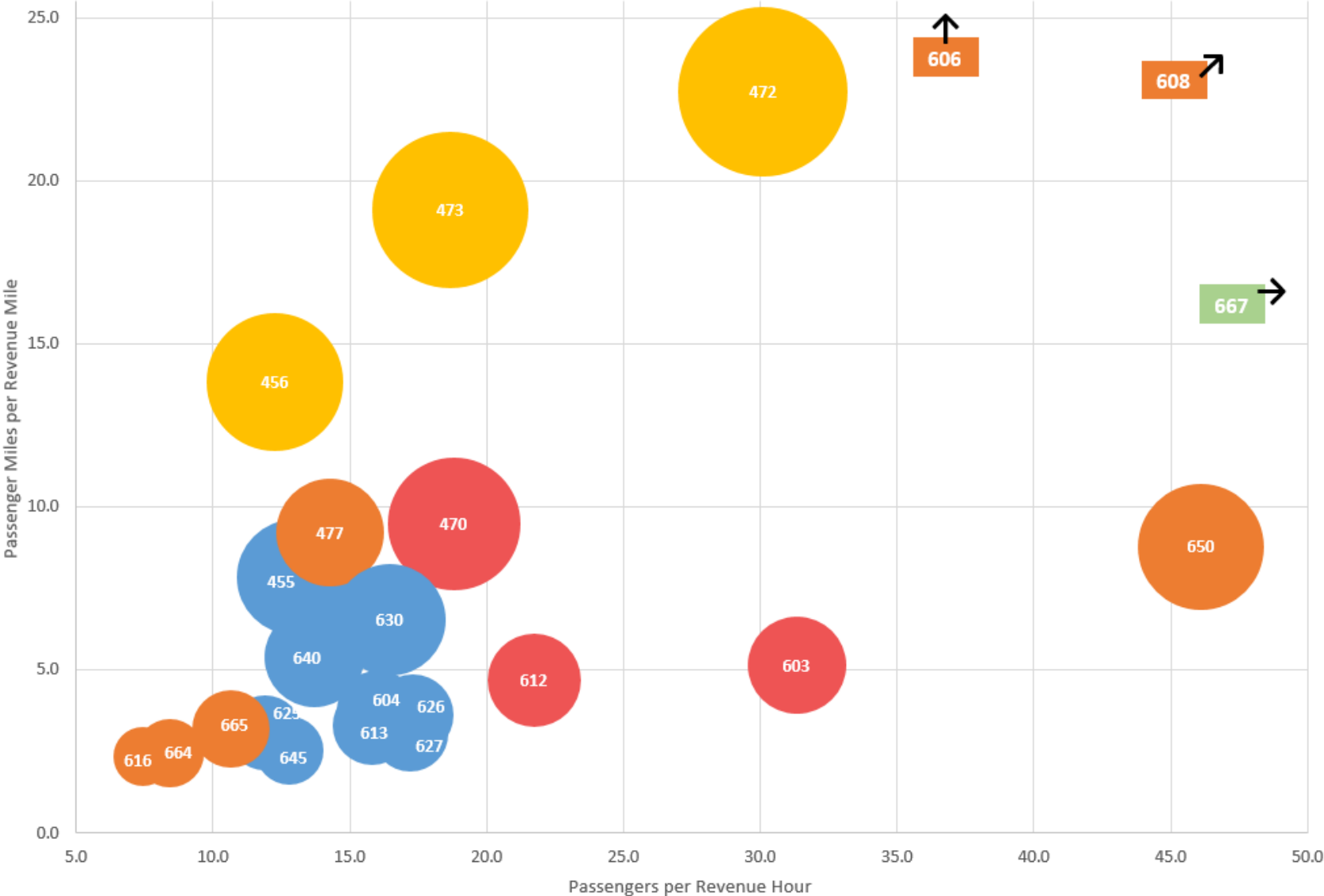
The bubble graph on the following page is an excerpt from a decision-making tool utilized by UTA’s planners to assist in prioritizing upcoming changes. It utilizes the legend pictured on the right to show the type of route (first column) and the average percent of the bus that is filled. The bus on 664 runs at an average of 6.5% capacity while the 665 runs at 10.7% capacity. Both are commuter shuttles.

The X-axis of the bubble chart is how many riders, on average, are aboard the bus during operational hours. 664 averages 8.4 riders per revenue mile and the 665 averages 10.7.

The Y-axis expresses in miles how long the individual rider remains on the bus when they have boarded. The 664 averages 2.5 miles per rider while the 665 averages 3.2. In the context of the rest of the Ogden Business Unit, which encompasses Davis, Weber and Ogden Counties, it is evident that these routes are below average in their ridership and utilization.



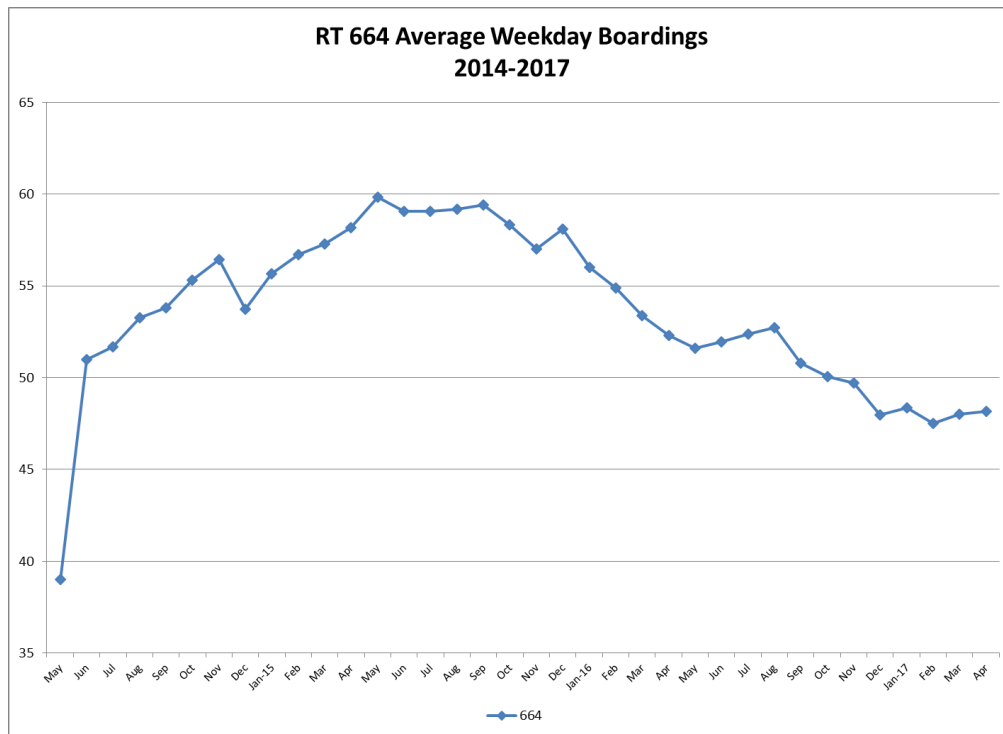
Mt. Ogden - Weekday



UTA has proposed to transition fixed route bus riders to the more economical Vanpool and RideVan Plus. Vanpool is a service where UTA provides a van to a group of commuters traveling to work who would like to travel together. This service is already utilized by riders on base. RideVan Plus is a hybrid commuting option for commuters who can take the Frontrunner or TRAX to the station nearest their destination, then travel as a group in the UTA provided van to and from their destination. The van remains parked at the station overnight. This solution would still provide existing bus users transportation on base at a less expensive option. The average cost per Vanpool users is approximately \$110 a month, but can be as low as \$30 a month depending on the monthly distance traveled and number of vanpool participants. RideVan Plus has a maximum charge of \$93. The cost of RideVan Plus would cover the cost of the participant’s premium monthly pass, which is regularly priced at \$198. If the rider has a pass provided through their employer, school, etc., then \$50 will be deducted from the cost of RideVan Plus and the rider will be required to pay the difference.

664 Ridership

Since May of 2015, there has been a downward trend in ridership, as illustrated in the graph below, which shows the daily average of boardings by month from May of 2014 through April of 2017.

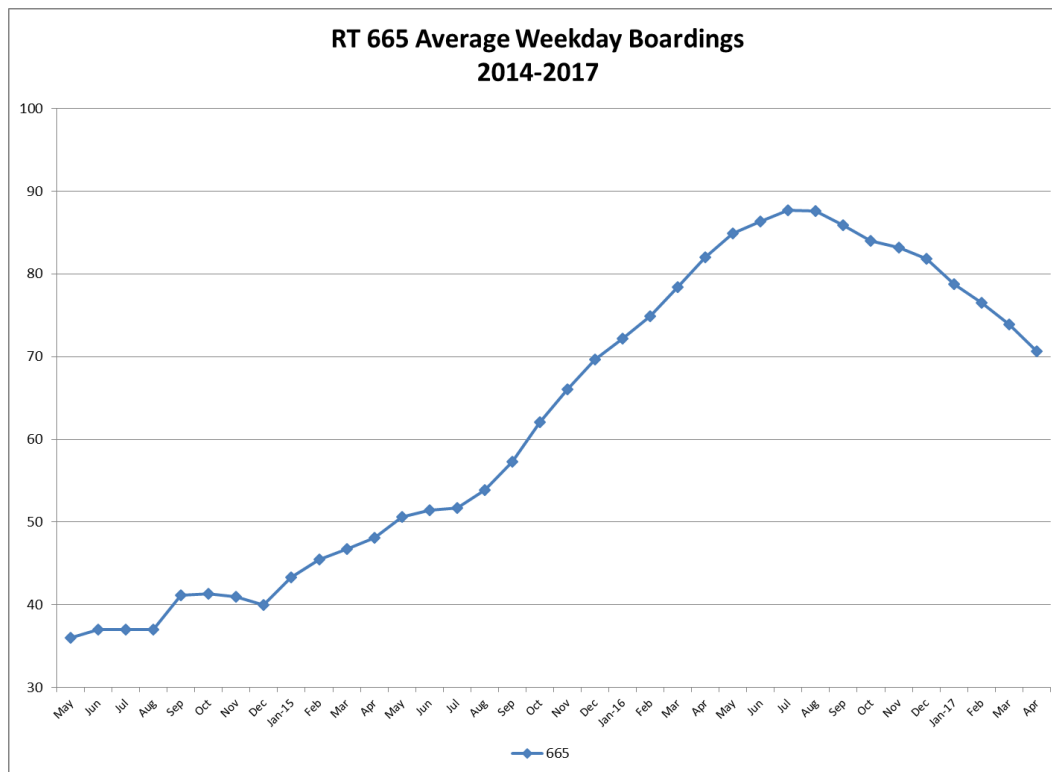


The table below shows the average daily boarding and alighting numbers by stop for January through May of 2016 and the same time frame in 2017. The first, and most frequented stop is the Layton Fronrunner station. Subsequent stops are all on Hill Airforce Base. Only one of the 8 stops on base averages more than one boarding or alighting per day.

Stop Activity: Jan- May 15 2016 and Jan-May 2017		Boardings Per Day		Alightings Per Day	
		2016	2017	2016	2017
Layton FR	MAIN ST @ 150 S	36.4	28.0	21.1	15.9
Inside HAFB	GUM LN @ 1215 N	0.0	0.1	0.0	0.0
	GUM LN @ 1213 N	0.0	0.0	0.0	0.0
	GUM LN @ 1201 N	0.0	0.0	0.0	0.0
	ARSENAL RD @ 1118 N	0.0	0.0	0.0	0.0
	CONNECTICUT @ 1286 W	0.1	0.0	0.0	0.3
	CEDAR LN @ 1276 N	0.1	0.1	0.0	0.0
	CALIFORNIA DR @ 1260 W	0.5	0.1	0.0	0.0
	WARDLEIGH RD @ 1207 N	13.7	10.6	17.6	13.5
Totals:		50.8	38.8	38.6	29.7

665 Ridership Information

As with the 664, the 665 has been experiencing a downward trend in ridership in recent months. As shown in the chart, the downward trend began in August of 2016 and has steadily decreased since.



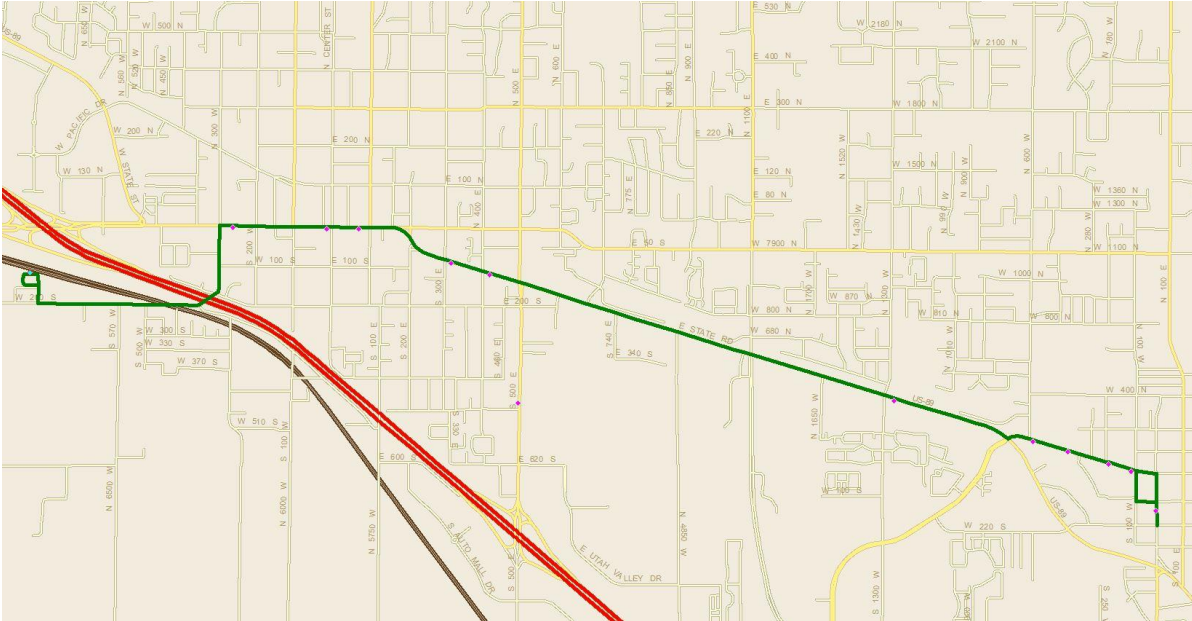
The 665 has higher average boardings than the 664, but this is due to the three stops off base, which is a direct line from the FrontRunner to Weber State University Davis. These stops were added in April of 2015 when ridership began going up.

The table below lists the individual stop utilization broken up to those on Hill Air Force Base (HAFB) and those off base. The stop at the Layton FrontRunner station has the most boardings and alights as a connector to the commuter rail and the Weber State University stop has the second highest. The most utilized stop on base, located at 538 South Southgate Avenue is within .3 miles from a stop off base which is regularly serviced by route 627.

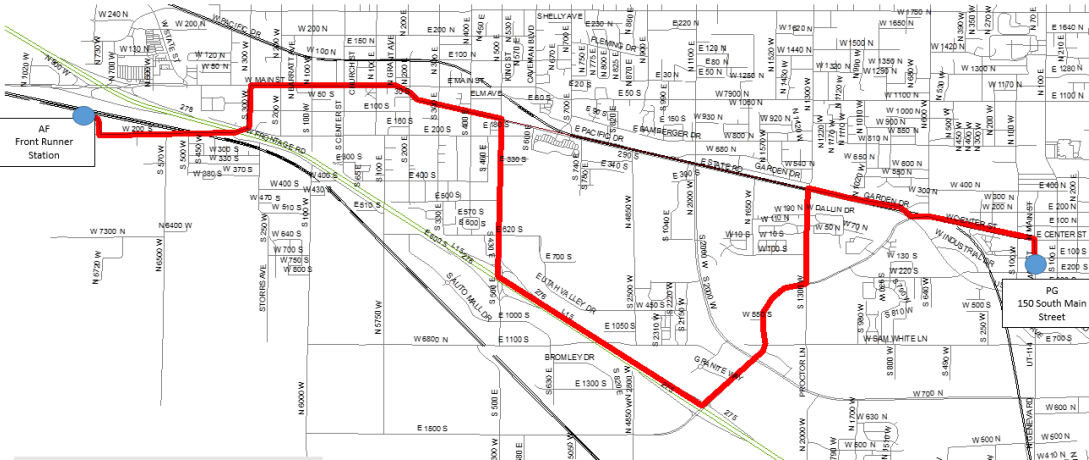
The final data point is the percent of all boardings and alightings that occur on base. Based on these figures, the majority of the ridership on these routes is not on base.

Stop Activity: Jan- May 15 2016 and Jan-May 2017		Boardings Per Day		Alightings Per Day	
		2016	2017	2016	2017
Layton FR	MAIN ST @ 150 S	79.8	45.7	37.1	20.9
Outside HAFB	UNIVERSITY PKWY @ 2750	11.7	10.9	21.9	9.3
	HWY 193 @ 492 W	0.0	4.3	0.0	4.2
	HWY 193 @ 524 W	0.0	0.0	0.0	0.2
	SubTotal:	91.5	60.9	58.9	34.6
Inside HAFB	SOUTHGATE AVE @ 538 S	2.7	3.0	3.2	3.1
	SOUTHGATE AVE @ 506 S	0.0	0.1	0.0	0.2
	SOUTHGATE AVE @ 443 S	0.2	0.1	0.0	0.5
	SOUTHGATE AVE @ 269 S	0.0	0.0	0.0	0.2
	SOUTHGATE AVE @ 233 S	0.4	0.0	1.0	1.0
	WARDLEIGH RD @ 113 W	0.8	0.6	0.3	0.4
	WARDLEIGH RD @ 148 W	0.0	0.2	0.0	0.1
	WARDLEIGH RD @ 191 W	0.0	0.0	0.0	0.0
	WARDLEIGH RD @ 51 W	0.6	0.9	0.5	1.0
	H AVE @ 823 S	0.2	0.1	0.2	0.2
	H AVE @ 876 S	0.0	0.1	0.1	0.3
	COMMUNITY LN @ 442 S	1.7	0.4	2.1	0.2
	11TH ST @ 526 W	0.5	0.5	0.6	0.0
	SOUTHGATE AVE @ 517 S	1.4	0.2	1.9	0.0
	Subtotal:	8.7	6.2	9.9	7.1
Totals:		100.2	67.1	68.8	41.7
Percent inside HAFB:		8.6%	9.3%	14.4%	17.0%

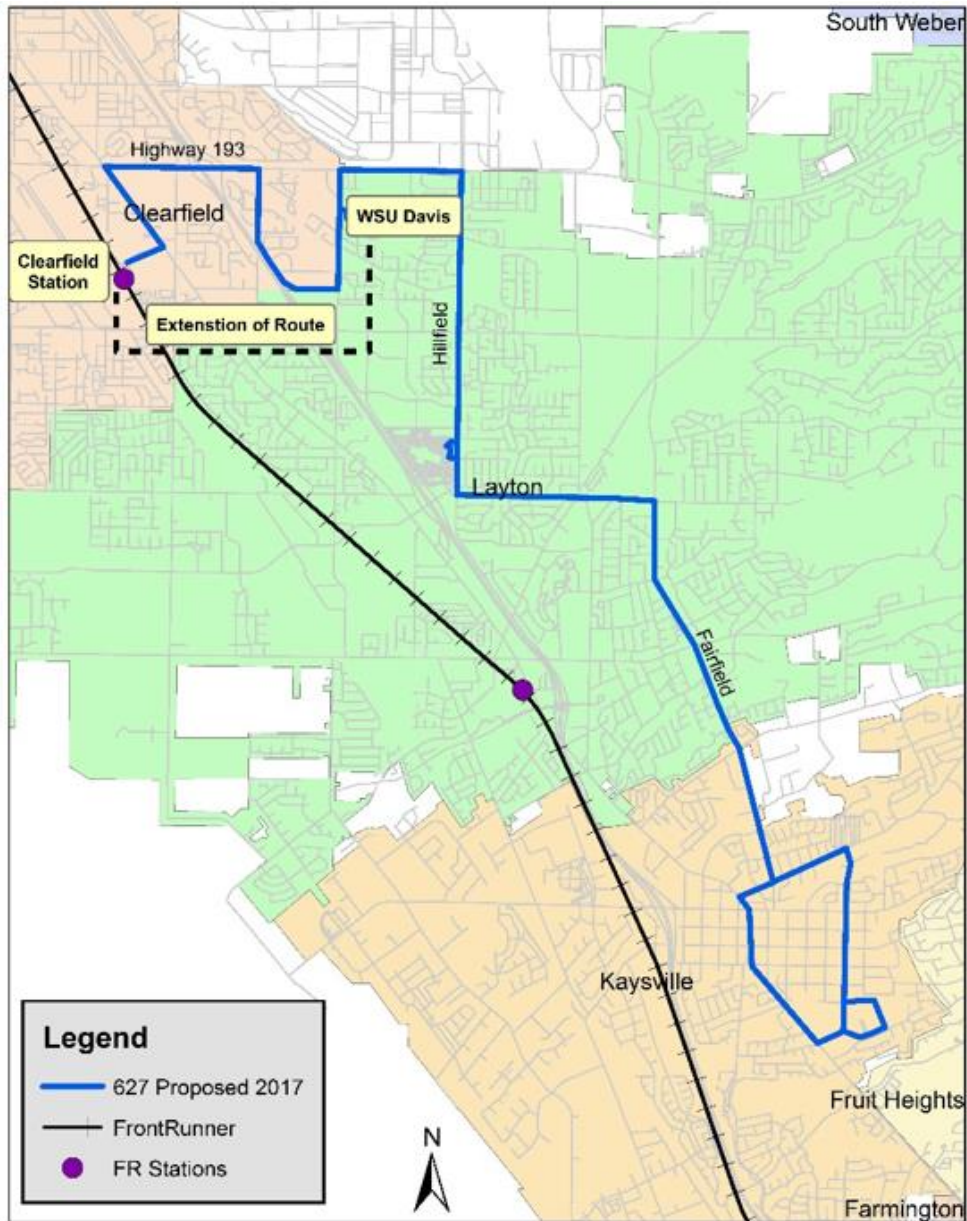
Route 809



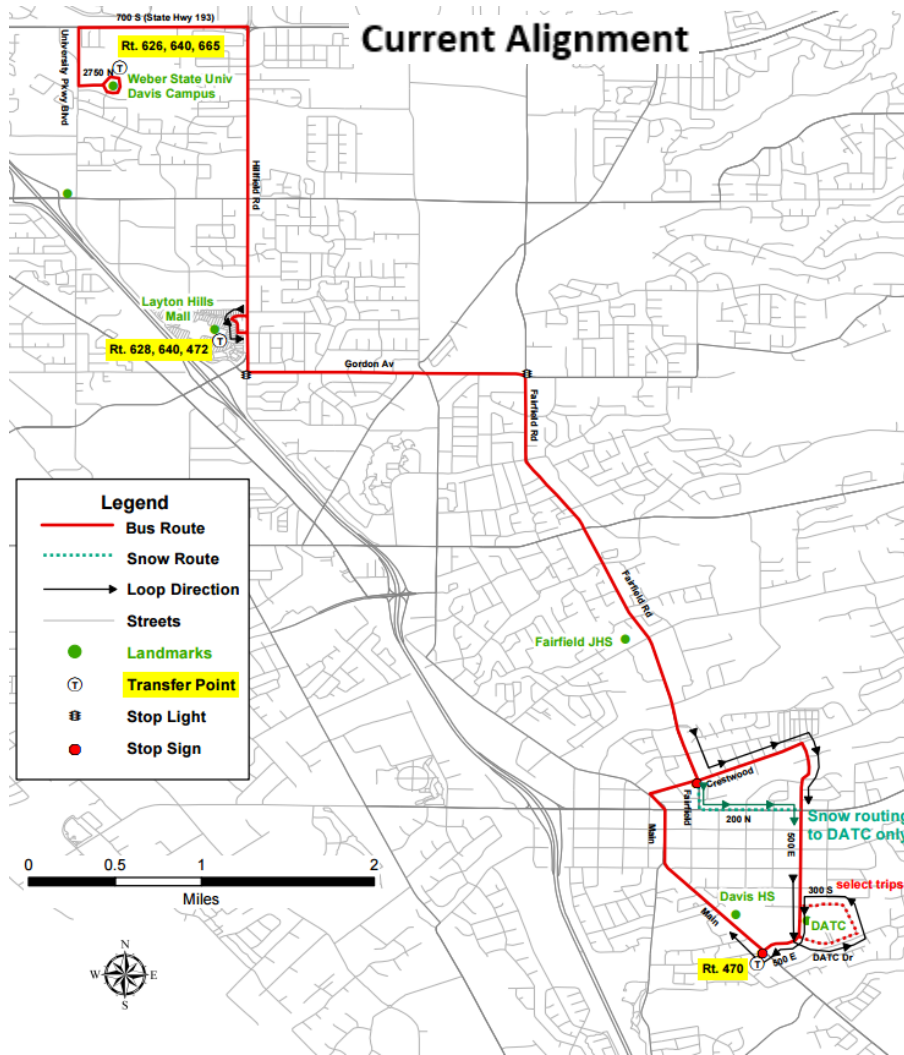
The 809 has been proposed as a new route in Utah County in our Timpanogos Business Unit that will utilize a deadhead trip on Route 806 and provide connectivity from downtown Pleasant Grove to the American Fork FrontRunner station. It is proposed to run two trips in the morning at 5:30am and 6:00am and will travel west from Downtown Pleasant Grove and end at the American Fork FrontRunner station, then two trips in the afternoon at 6:30pm and 7:00pm heading east and terminating at downtown Pleasant Grove. The initial proposal included additional routing that would have included additional routing, but after the public comment period yielded no definitive support for the longer routing, it was curtailed. Initial route proposal is depicted below.



Route 627



UTA is proposing an addition to the existing route 627 within the Ogden Business Unit. The proposed addition would provide a direct connection from Weber State University (WSU) Davis, where the route presently ends, through Clearfield City to the Clearfield Station. This can be used as an alternative to the proposed cancellation of route 665, which provides service from the Layton FrontRunner Station to WSU Davis. Current alignment follows.



Public Outreach

Ogden Business Unit Public Outreach

On April 25, 2017, UTA held a public hearing to solicit public input on the proposed elimination to routes 664 and 665 and the proposed addition to route 627. All of these changes were in the Ogden Business Unit and were combined into one public hearing. The comment period for these changes was between April 10 and May 10 of 2017. The public hearing was held on April 25th at Weber State Davis' campus in Layton, UT. The campus is central to the changes and the location of one of the most frequented stops on the routes being eliminated. The hearing and notice of changes were advertised in the Davis County Clipper, the Ogden Standard Examiner,

the State of Utah's public notice website and on rideuta.com. Comments were also solicited on the agency's Open UTA online comment system. The hearing and comment period were also promoted on UTA's social media channels.

Routes 664 & 665

Overall, 30 people offered comments, with some providing comments on both routes – seven at the public hearing, eight at hearingofficer@rideuta.com and 15 on the Open UTA system. In total, 11 people attended the public hearing, and 59 visitors reviewed the proposal on the Open UTA system.

These changes were also posted on UTA's website and available for public comment electronically. The changes were viewed 49 times and responded to 15 times.

Route 664 Feedback

Regarding *route 664*, of the 27 respondents, 18 were against, five were for, and three were undecided concerning the elimination of route 664. Those for the changes expressed appreciation for the more efficient transportation alternative of RideVan Plus and Vanpool and gave logistical suggestions about parking.

Those against the expressed concerns that generally fell into the following categories

- There may be a delay in qualifying for RideVan Plus and/or Vanpool for new employees.
- Lack of connectivity from FrontRunner to employment on base.
- Lack of flexibility for transit dependent individuals moving to alternatives that will only travel to and from base once per day
- Previous service issues may have caused poor ridership
- General concern for one's inability to get to work, though do not mention the proposed alternatives

Route 665 Feedback

Of the 24 respondents for this route, six were for the changes, 13 against and five undecided about the proposed elimination. Comments mirrored those for the 664, but had less comments

Alternative Transportation Reception

By the end of June, the Special Services Program had heard from twenty-one 664 & 665 riders who requested more information about the Vanpool and RideVan Plus options. Of those, 11

ultimately were not interested in joining or creating a Vanpool, which provides transit from one's home to the end location. They expressed that they would either like more flexibility in their schedule or would work to join a RideVan Plus option. Two of the remaining ten had already joined a Vanpool. UTA has followed up with everyone who contacted Special Services regarding the requirements to set up a RideVan Plus and is seeking enough commitments to begin the program at this location.

Route 627

FEEDBACK FROM MEETING:

These changes were also posted on UTA's website, on the Open UTA system and available for public comment electronically. On the Open UTA system, the proposal was viewed 33 times. Twelve comments were received during the proposal's comment period – two at the public hearing, six on Open UTA and four at hearingofficer@rideuta.com. Eleven of the comments expressed support for the proposal, and one comment was neutral and included an alternate proposal. Some commenters gave logistical comments, but all were positive in their responses.

Timpanogos Business Unit Public Outreach

On May 25, 2017, UTA held a public hearing to solicit public input on the proposed changes to route 809. This change took place in the Timpanogos Business Unit and was the only major service change in this area. The comment period for this proposed addition was between May 11, 2017 and June 11, 2017. The public hearing was held on May 25 at the Pleasant Grove Recreation Center, which is located near the community where changes are being proposed. The hearing and notice of changes were advertised in the Provo Daily Herald, on rideuta.com, on the State of Utah's public notice site, and on UTA's Open UTA system. On the Open UTA system, 48 visitors viewed the proposal. There were no attendees at the public hearing and one phone call placed concerning the proposal to add route 809. The phone call requested that it be full service so that paratransit could be added to the region.

For the 809 proposal, 14 comments were received with 10 as favorable and four as undecided.

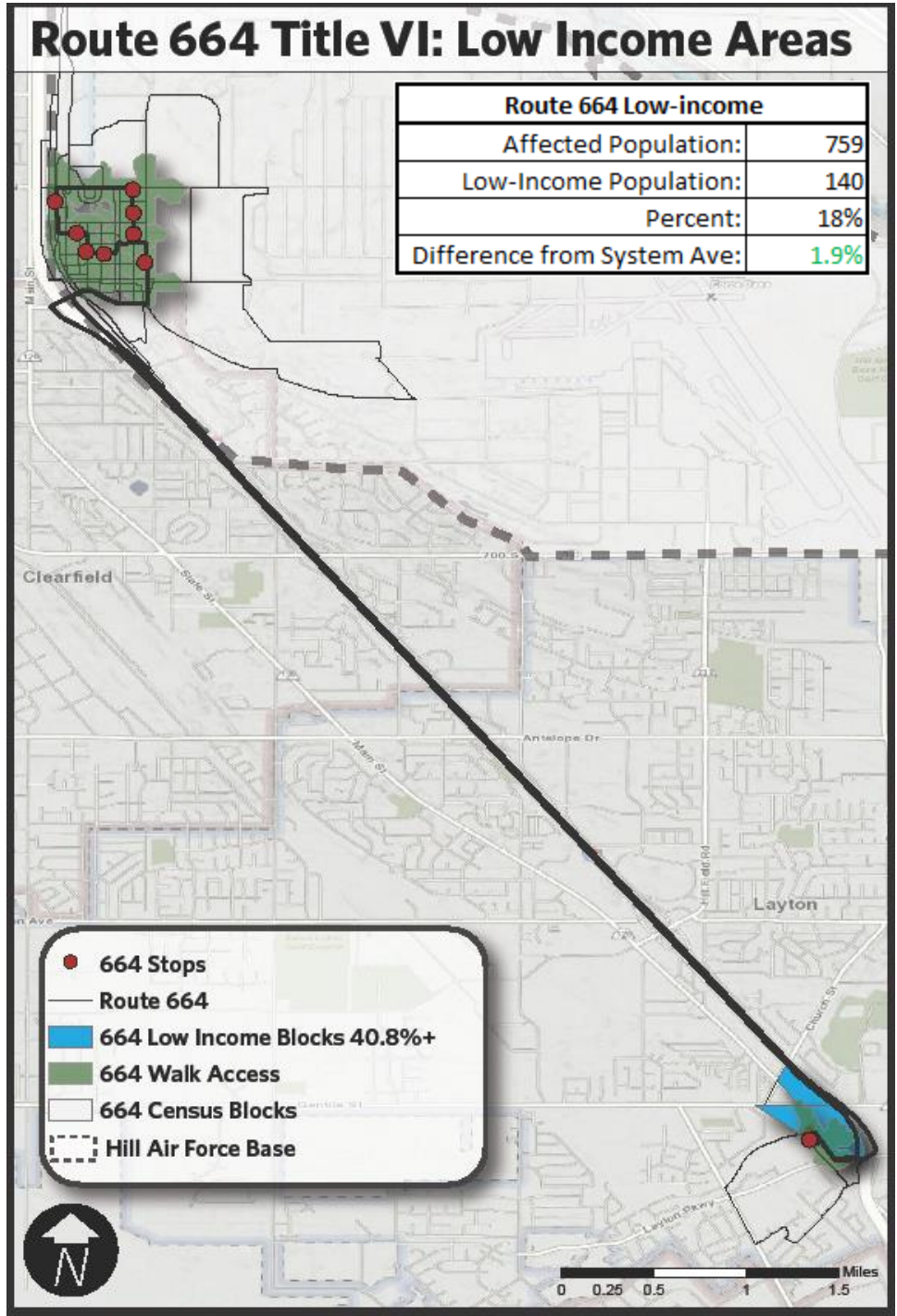
Analysis of Proposed Changes

UTA is required to analyze the potential impacts of any major service change as it relates to low-income populations and minority populations. Pursuant to this requirement, UTA has created the following maps, tables and related data. The data in this section was compiled utilizing American Community Survey (ACS) 2011-2015 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups. This was done in order to use the smallest geographic area possible for the analysis. The distribution was dictated by population ratios from 2010 Census Data. Analysis was done based on the stops of the route. All stops have had a one quarter mile radius applied to them based on the actual accessibility of the route by road. Any census block that is overlapped by this walkability radius has its population included as those effected by the proposed changes. These aggregated numbers are compiled as a comparison group to the service area average to determine disparate impact and disproportionate burden.

The maps in this section will show the route, individual stops with a walkability radius, and census blocks with concentrations of low-income households or minority individuals above the system average, which are shaded according to density.

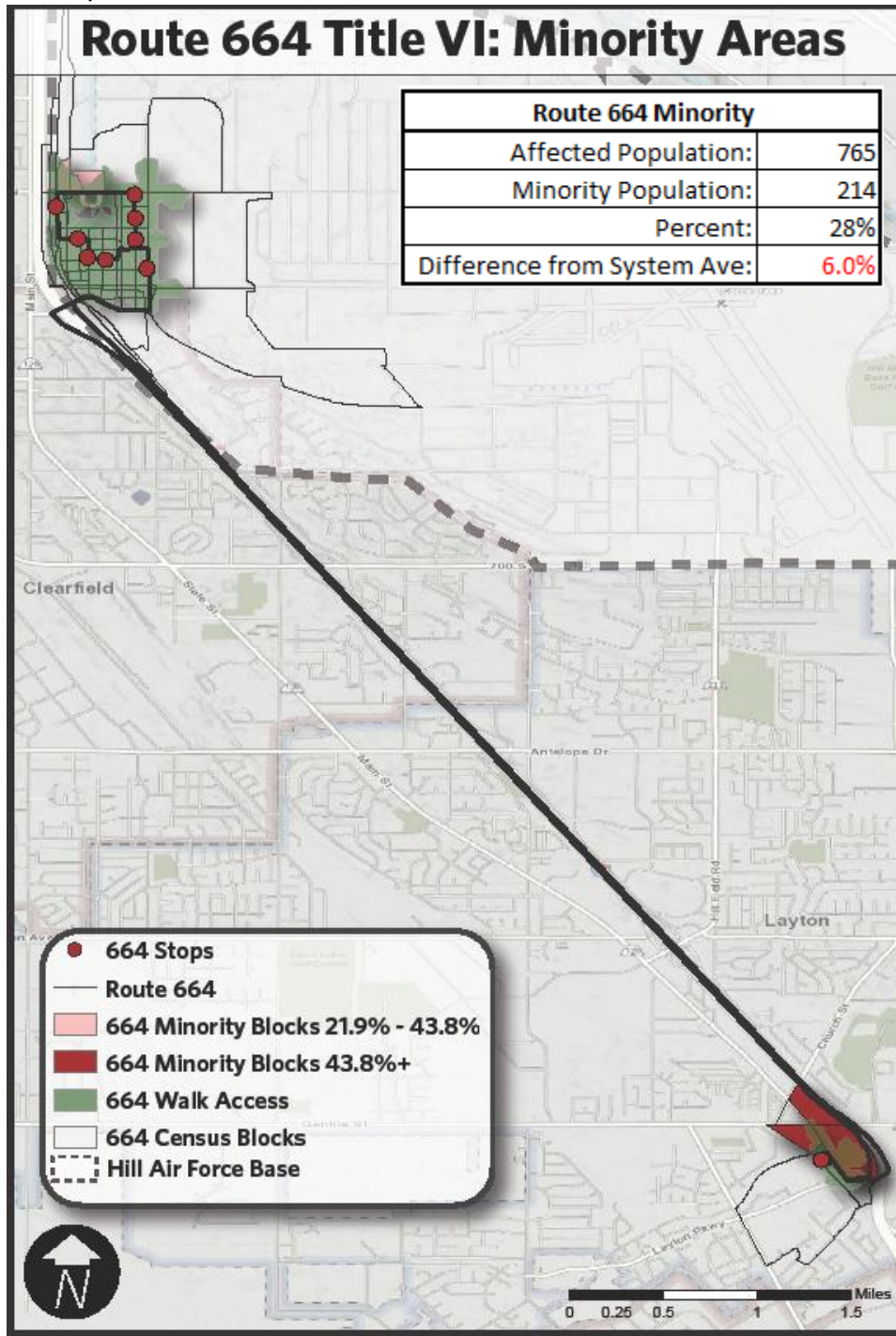
Route 664

Low-Income Analysis



As expressed in the figure and table above, the total low-income populations negatively impacted by this elimination is 1.9% less than the system average.

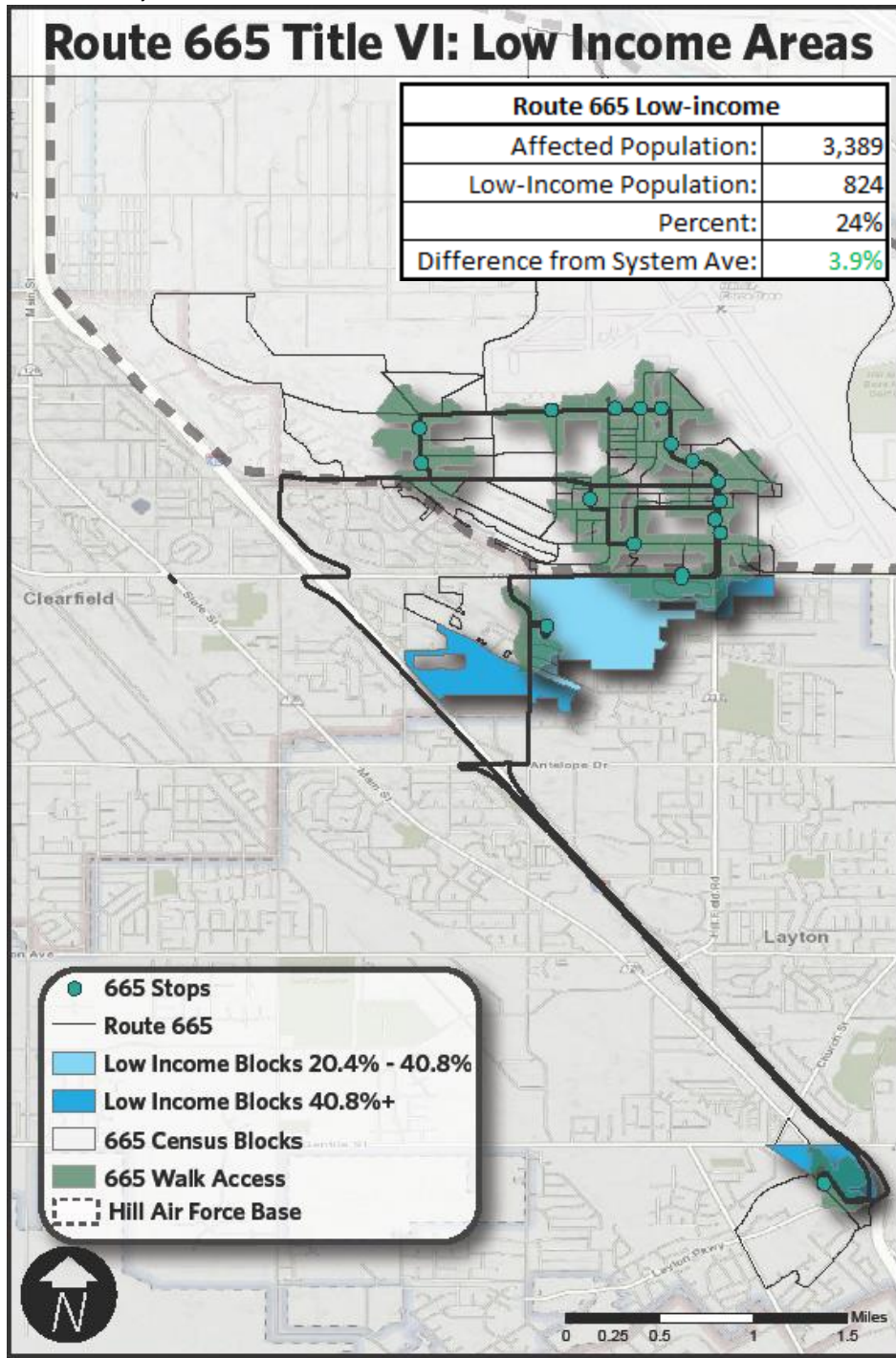
Minority Analysis



As expressed in the figure and table above, the low-income households negatively impacted by this elimination is 6% above the system average.

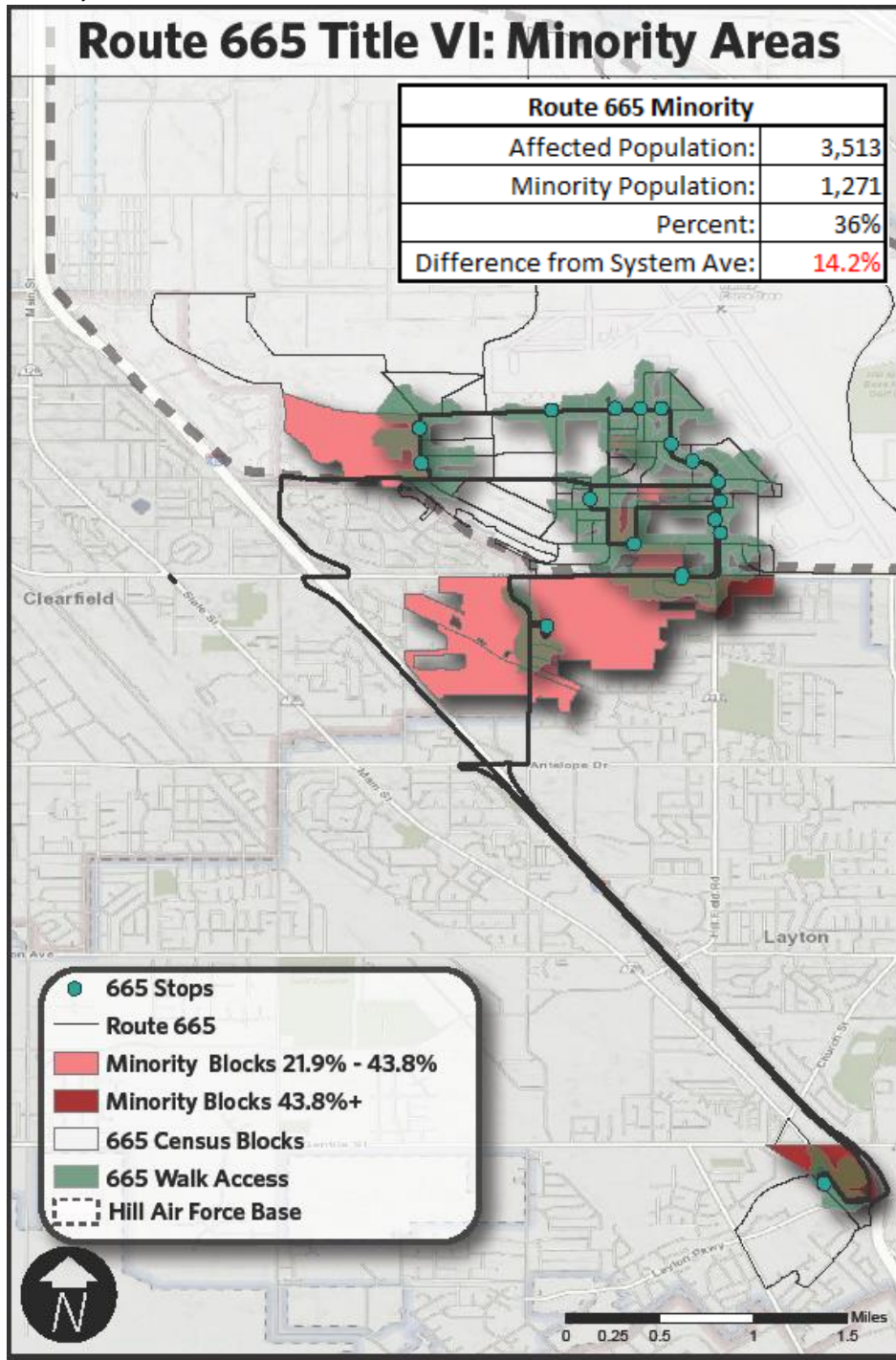
Route 665

Low-Income Analysis



As expressed in the table and figure above, the low-income households negatively impacted by this elimination is 3.9% above the system average.

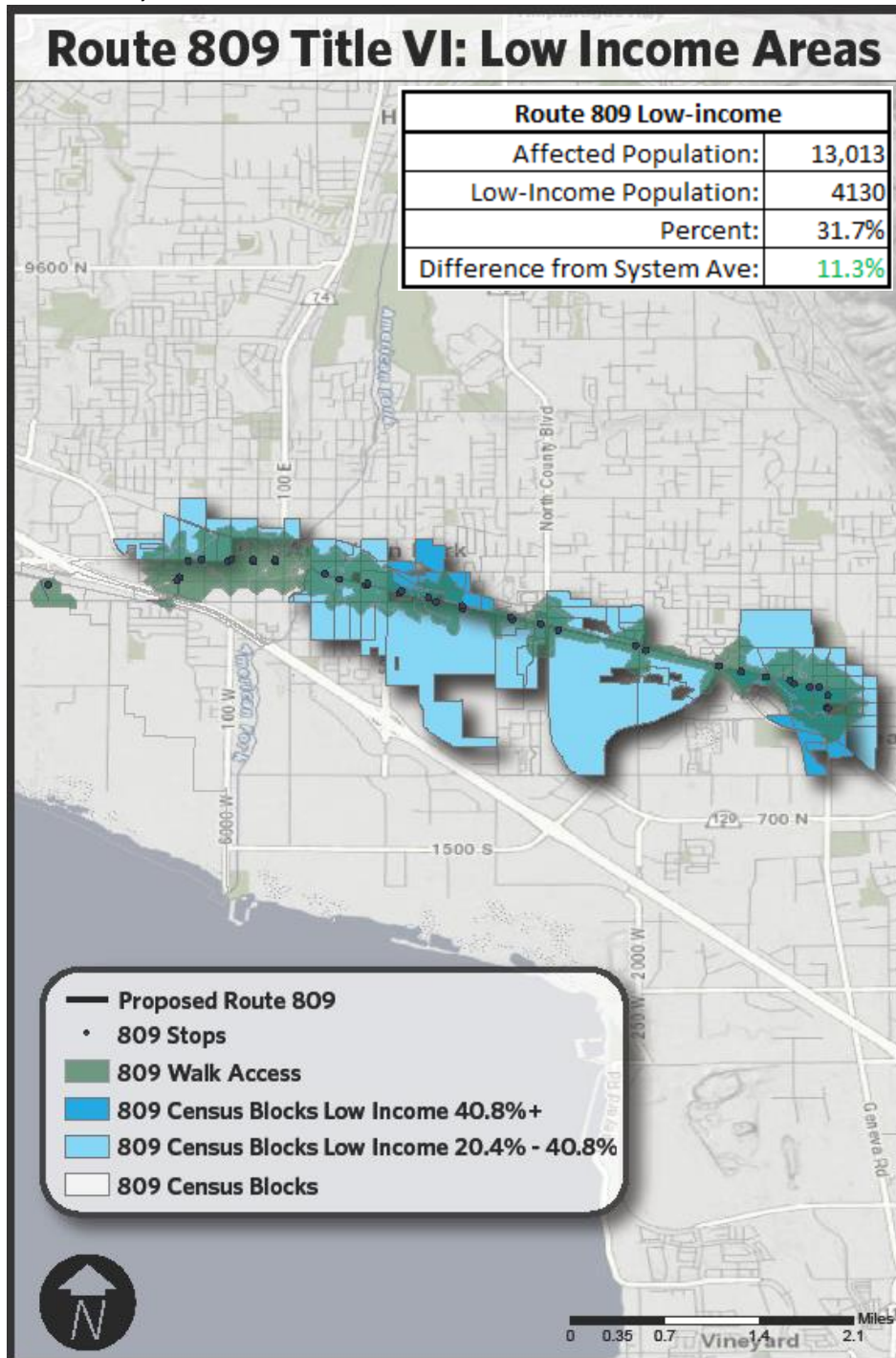
Minority Analysis



As expressed in the table and figure above, the minority populations negatively impacted by this elimination is 14.2% above the system average.

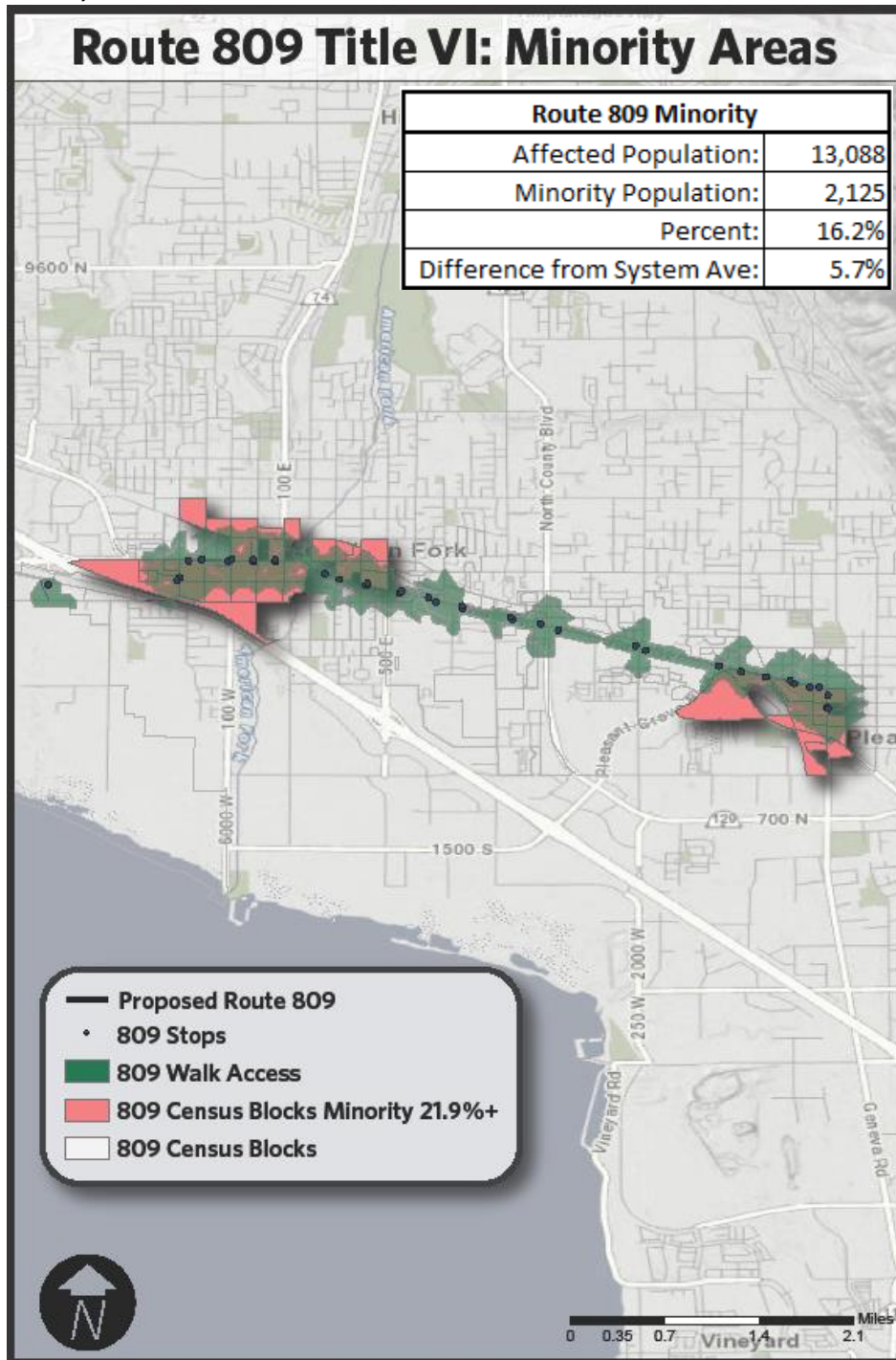
Route 809

Low-Income Analysis



As expressed in the table and figure above, the low-income populations impacted by this addition is 11.3% above the system average.

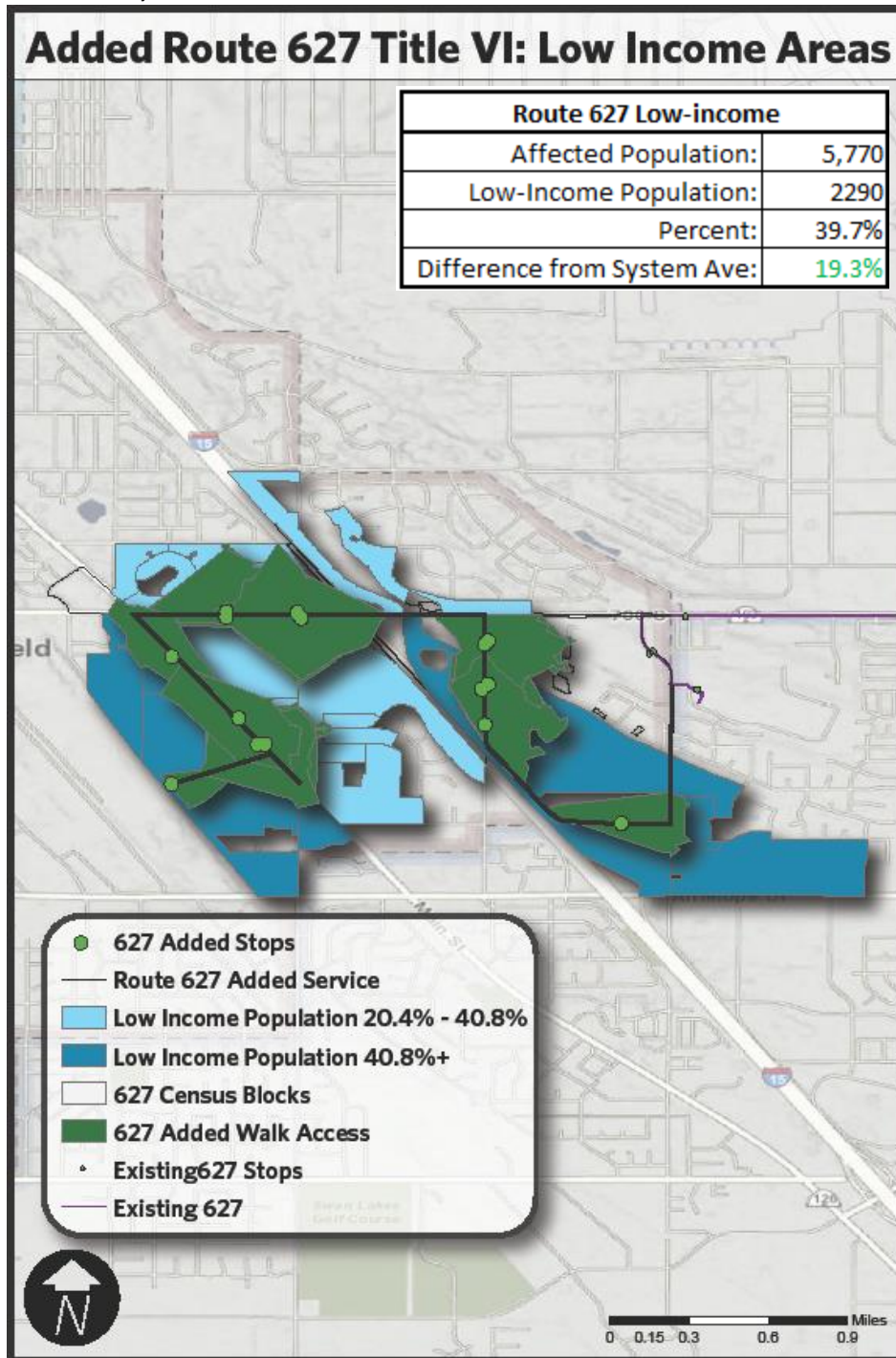
Minority Analysis



As expressed in the table and figure above, the minority populations impacted by this addition is 5.7% below the system average.

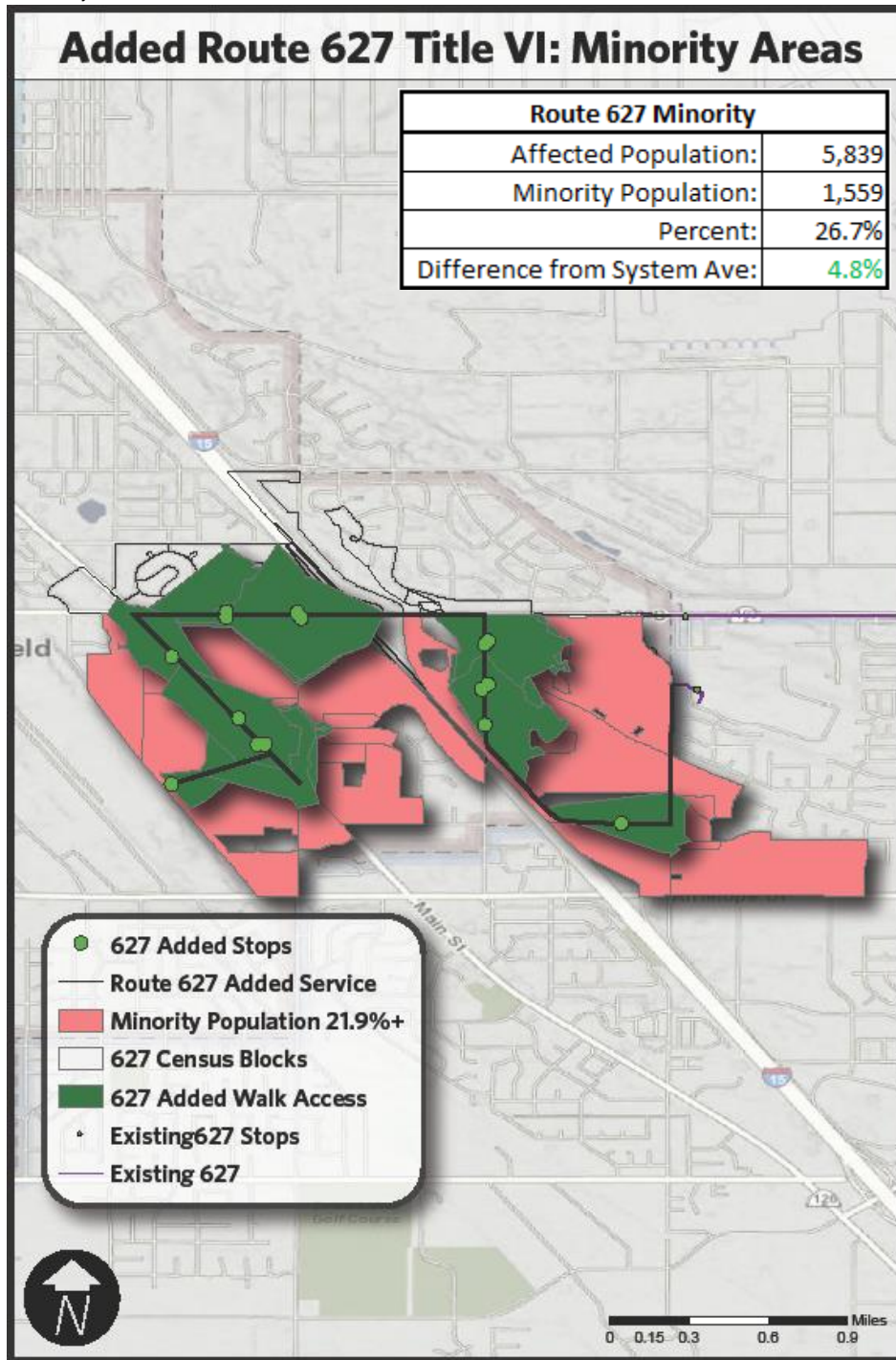
Route 627

Low-Income Analysis



The figure above is just of the routing and stops proposed to be added. The table and figure show that the low-income populations impacted is 19.3% above the system average.

Minority Analysis



The figure above is just of the routing and stops proposed to be added. The table and figure show that the low-income populations impacted is 4.8% above the system average.

Cumulative Analysis of Changes

In accordance with UTA Policy, UTA will evaluate the impacts of all major service changes cumulatively when there is more than one route being affected for a service change period. Since the proposed changes during this change period fall into those being added and those being eliminated, they are being evaluated in these two categories.

Eliminations:

The cumulative demographics of the populations being effected by the elimination of both route 664 and route 665 are expressed below.

Route 664 & 665 Low-income	
Affected Population:	3,429
Low-Income Population:	834
Percent:	24.3%
Difference from System Ave:	3.9%

Route 664 & 665 Minority	
Affected Population:	3,559
Minority Population:	1,291
Percent:	36.3%
Difference from System Ave:	14.3%

Additions:

The cumulative demographics of the populations being effected by the additions of route 627 and to 809 are expressed below.

Route 809 & 627 Low-income	
Affected Population:	18,783
Low-Income Population:	6420
Percent:	34.2%
Difference from System Ave:	13.8%

Route 809 & 627 Minority	
Affected Population:	18,927
Minority Population:	3,684
Percent:	19.5%
Difference from System Ave:	2.4%

Findings of Analysis

Elimination of Routes 664 & 665

There were no disproportionate burden found in the analysis of this service change. While there were more low-income households in the area impacted by these changes than the system average, it did not exceed the 5% threshold that would require additional steps to minimize, mitigate or offset the adverse effects.

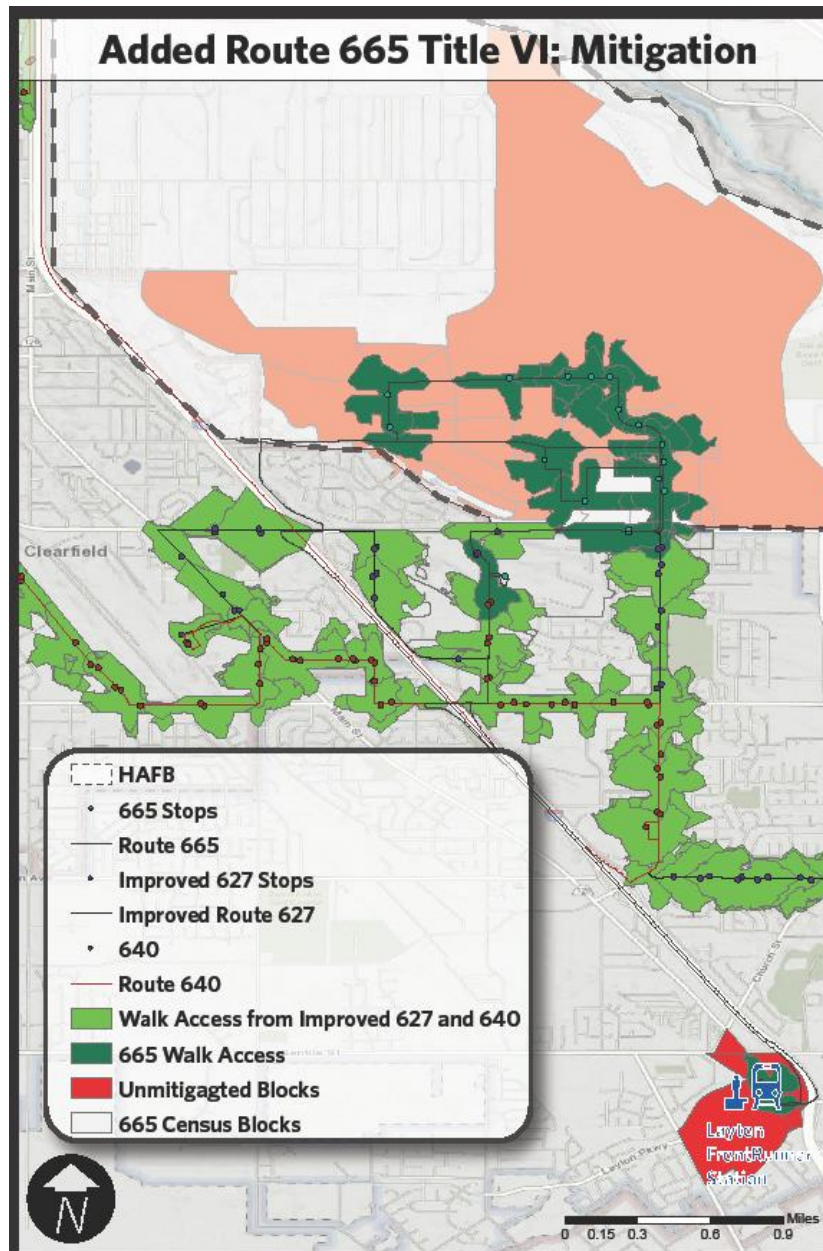
There may be disparate impacts on minorities in these eliminations. When examining population data, the minority populations impacted by these changes exceeded the UTA designated threshold of a 5% negative impact. UTA has examined various mitigating factors and has determined that it has met the requirements to continue with the proposed changes despite these potential disparate impact that population demographics may suggest.

Justification for Continuing with Changes

Obtaining accurate demographics on this route was a challenge. Since these are commuter routes originating at a FrontRunner station, it is improbable that the population immediately within the ¼ mile walk buffer would be the primary users of the route. This may be negated if the primary route destination were accessible by the general public, but with only those with credentials to get on base being able to ride the routes this decreases, again, the probability of the immediate population around the stops accessing the originating stop at the FrontRunner. With the boardings on base being as low as they are, it would appear unlikely that those living on base are accessing the route either. With these considerations, the ridership is likely people from around the system that are accessing FrontRunner to get to the base or WSU Davis. For those who are accessing WSU Davis, UTA has prepared a map of the other routes connecting FrontRunner to campus, which will be included at the end of this section. In this map, all off-base stops are mitigated by alternative routes.

In looking at a ridership survey conducted in 2015 and 2016 where over 16,000 riders were surveyed throughout the system, there were a combined average of 96 riders on these routes at the time of survey. Of these riders, 13 were captured. 100% of those surveyed on this route self-reported as white and non-Hispanic. UTA, however, determined that this was not an adequate sample size to properly reflect the ridership demographics and only includes it as informational as to efforts made by the agency to ascertain the most accurate information available.

Pursuant to FTA Circular 4702.1B, UTA has reviewed possible changes to the proposed changes. In this review, it was determined that *UTA has a substantial and legitimate justification to proceed with the proposed changes* due to the low ridership illustrated on pages 9-13 of this report. Continuance of these routes would not be financially viable for the limited number of riders utilizing them when RideVan Plus and Vanpool could meet the need in a more efficient way. UTA conducted outreach to ensure current riders were aware of and engaged with Rideshare and/or Vanpool programs. These options provide a viable alternative for those who are transit dependent on work on base.



Addition of Routes 809 & 627

There were no disparate impacts or disproportionate burden found in the analysis of this service change. While route 809 did have 5.7% less minorities in the impacted populations than the system average, UTA has determined that the addition does not meet UTA's policy on disparate impact. The policy states that the changes must have a "5% worse" effect on protected populations. This addition does not *negatively* impact minority populations since there was no adverse effect such as a decrease in service to fund this new route. Additionally, Utah County, where the addition takes place, only has a minority population of 14.9% which is less than the effected population.

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE APRIL 2018 CHANGE DAY
TITLE VI EQUITY ANALYSIS**

R2018-03-04

March 28, 2018

WHEREAS, the Utah Transit Authority (the "Authority") is a public transit district organized under the laws of the State of Utah and was created to transact and exercise all of the powers provided for in the Utah Limited Purpose Local Government Entities – Local Districts Act and the Utah Public Transit District Act; and

WHEREAS, the Board of Trustees of the Authority (the "Board"), in keeping with the Federal Transit Administration's requirements for public transit agencies and the Civil Rights Act of 1964 has considered and reviewed the April 2018 Change Day Title VI Equity Analysis ("Title VI Equity Analysis") prepared by Authority staff; and

WHEREAS, the Board has desires to approve the Title VI Equity Analysis.

NOW, THEREFORE, BE IT RESOLVED by the Board of the Authority:

1. That the April 2018 Change Day Title VI Equity Analysis prepared by Authority staff, a copy of which is attached hereto as Exhibit A, is hereby approved by the Authority.
2. That the Board hereby ratifies any and all actions taken by the Authority's President/CEO, General Counsel, and staff in furtherance of and effectuating the intent of this Resolution.
3. That a copy of this Resolution shall be submitted to the Federal Transit Administration.
4. That the corporate seal be attached hereto.

Approved and adopted this 28th day of March 2018.



Greg Bell, Chair
Board of Trustees

ATTEST:


Robert K. Biles, Secretary/Treasurer

(Corporate Seal)



CERTIFICATE

The undersigned duly qualified Chair of the Board of Trustees of the Utah Transit Authority certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Board of Trustees held on the 28th day of March, 2018.



Greg Bell, Chair
Board of Trustees



Robert K. Biles, Secretary/Treasurer

Approved As To Form:



Legal Counsel

Exhibit A



Title VI Service and Fare Equity Analysis

April 2018

Utah Transit Authority
Prepared by: Andrew Gray
Graphics and Data: Joseph Taylor

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Utah Transit Authority has committed to the Federal Transit Administration's (FTA) Title VI objectives set forth in Circular 4702.1B by ensuring that UTA's services are made equitably offered and resources distributed without regard to race, color, or national origin.

The following analysis is of proposed changes to be implemented on April 8th of 2018. These changes are being proposed to improve service delivery throughout the system. Though the proposed changes are facially neutral, this analysis, in accordance with FTA requirements, will ensure that these changes will not have disproportionately negative impact on minority and low-income populations within UTA's service area. If these changes are found to be discriminatory, UTA will take all prescribed and prudent steps to ensure services are equitable and compliant with federal guidelines and requirements.

Summary of Proposed Changes

Route 834 – Addition to Route:

It is proposed to add to the northern leg of the 834 route in Utah County. This new routing would connect the Riverwoods shopping complex in Provo and State Street. The added mileage is greater than 25% of the original route, which constitutes a major change according to UTA policy.

Route 864 – Creation of Route:

The Thanksgiving Point area has a large number of office buildings with substantial traffic delays which will be exacerbated by upcoming road construction projects. Route 864 will provide a connector from the commuter rail station to the office buildings on the west side of the I-15 freeway. The addition of service constitutes a major change according to UTA policy.

Removal of Fare Media:

It is proposed to eliminate the technology associated with the ability to pay with mobile digital wallets (Apple Pay, Google Pay, etc.) and contactless credit/debit cards as a fare media available through our card readers. This method of payment has limited use and direct alternatives exist on all modes of transit excluding contactless credit/debit cards on bus. The elimination of this fare media constitutes a major change.

UTA Policy and Definitions

UTA has developed corporate policy 1.1.28 Title VI Compliance Policy to define and evaluate the impacts of proposed major services changes on minority and low-income populations in conjunction with a public outreach process. In developing this policy, UTA solicited feedback through newspapers within the service area, published on UTA's website (rideuta.com), and Utah's government website in the public notices section (Utah.gov) which provides translation options. In conjunction with the Salt Lake County Office of Diversity Affairs, which maintains an email list of local entities and individuals with interest in diversity issues, UTA sent an email notification soliciting feedback in the development of this policy. Additional targeted outreach was done, which included mailing a letter and the policy or sending emails to community organizations that work with minority or low-income populations.

The following references to policy are from subsections of corporate policy 1.1.28 and were created to ensure that all equity analyses are performed using the same parameters and are in line with FTA Circular 4702.1B.

Definitions

- A. *"Disparate Impact"* refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- B. *"Disproportionate Burden"* refers to a neutral policy or practice that disproportionately affects the low-income population more than non-low-income populations.
- C. *"Low-income Population"* refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/ transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.
- D. *"Minority Person"* include the following:
 - 1. American Indian or Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 - 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia,

China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
 5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- E. *"Minority Population"* means any readily identifiable group of minority persons who live in geographic proximity.
- F. *"National Origin"* means the particular nation in which a person was born, or where the person's parents or ancestors were born.
- G. *"System Average"* The system average is the averages of minorities and low-income persons within the total populous of the geographic regions UTA serves. The present system averages are expressed below in tabular format using 2011-2015 5-year population estimates provided by the American Community Survey (ACS).

<i>Low-Income System Average:</i>	
Population:	2,243,746
Low-Income Population:	457,949
Percent Low-income:	20.4%

<i>Minority System Average:</i>	
Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Major Service Change

UTA will consider the following types of changes to be "major changes", which require public input and a Title VI equity analysis in compliance with FTA's Circular 4702.1B

- a) The Addition of Service;
- b) A proposed service level reduction in miles, hours, or trips of thirty three percent (33%) or more of any route;
- c) The elimination of all service during a time period (peak, midday, evening, Saturday, or Sunday);
- d) A proposed twenty-five (25%) or greater change in route alignment;
- e) A proposed fare change.

Evaluation and Analysis of Service and Fare Changes

1. UTA will analyze proposed major changes to service and any proposed fare changes in accordance with FTA's Circular C 4702.1B as amended.

2. UTA will evaluate the impacts of all major service changes cumulatively when there is more than one route being affected for a service change period
3. UTA will primarily utilize American Community Survey (ACS) Data, block group data and/or ridership data to evaluate and analyze any proposed major service and fare changes. This data will be analyzed with Geographic Information System (GIS) software.
4. UTA will rely on population data and use the smallest geographic area that reasonably has access to the stop or station effected by the proposed major service change. This will be translated into a one-quarter mile radius to a bus stop, one-half mile to a light rail station and three miles to a commuter rail station.

Disparate Impact and Disproportionate Burden

1. UTA will measure the burdens of service and fare changes on minority riders to determine when minority riders are bearing a disparate impact from the change between the existing service or fare and the proposed service or fare.
2. UTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service or fare and the proposed service or fare.
3. A threshold of 5% will be used to determine disparate impact on minority populations and disproportionate burden on low-income populations. This 5% is based on the margin of error from the US Census data that UTA uses to determine the populations in the service area. This means that if the burden of the service or fare change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, then the change will be considered either a disparate impact or a disproportionate burden.

Finding a Disparate Impact

1. At the conclusion of UTA's Analysis, if UTA finds a disparate impact on the basis of race, color, or national origin, UTA shall seek to modify the proposed changes in a way that will mitigate the adverse effects that are disproportionately borne by minorities. Modifications made to the proposed changes must be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts.
2. If UTA chooses not to alter the proposed services changes despite the potential disparate impact on minority populations, or if UTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service or fare change, UTA may implement the change only if:

- a. UTA has substantial legitimate justification for the proposed change; and
- b. UTA can show that there are no alternatives that would have a less disparate impact on the minority riders but would still accomplish the transit provider's legitimate program goals. In order to show this, UTA must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative

Finding a Disproportionate Burden

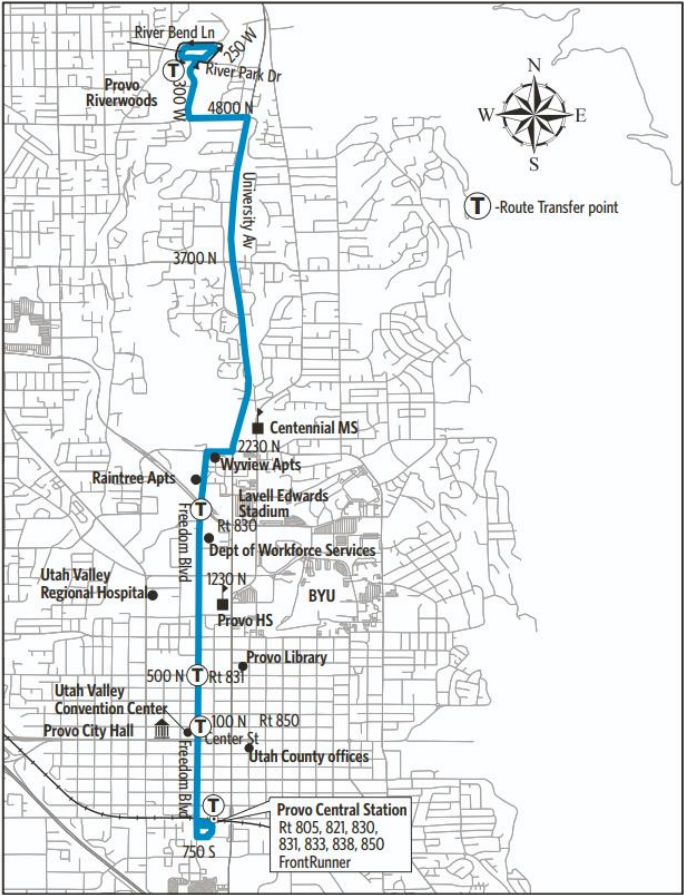
If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. UTA will also describe alternatives available to low-income passengers affected by the service changes.

Proposed Changes

Routes 834

Route 834 runs every 30 minutes during peak times and provides a connection from Provo Central Station through downtown Provo, near the BYU Campus, residential areas, the Riverwoods shopping area and finally the Riverwoods Urgent Care and surrounding offices.

It is proposed to carry the route further west along Orem Center Street and provide a connection to State Street. This will relocate the stop closest to the Riverwoods Urgent Care center, but provide expanded service to Western Orem. Additionally, it is proposed to reroute a small section of the route along University Avenue which rejoins the original routing via 2230 North. This will add stops and provide a stop that will connect the 834 to a future BRT station.




Route 864

The Thanksgiving Point and Silicone Slopes area of Lehi has been the fastest growing region in Utah. It is positioned in northern Utah County around the I-15 freeway with a high density of tech companies set up in the area with new offices being built. UTA has proposed to add a route that will provide a circuit around the FrontRunner commuter rail station and the office buildings to the west side of the freeway. Traffic in the area is already excessive, but will be exacerbated by extensive road construction in the area. This route would make accessing local destinations easier for those utilizing the commuter rail station in the area.

Fare Media Elimination

It has been proposed that UTA discontinue accepting contactless bank cards (VISA, MasterCard, Discover, AmEx, etc.) and Near Field Communication (NFC)-enabled mobile wallet applications as fare payment via UTA's Electronic Fare Collection (EFC) System. NFC-enabled mobile wallet applications would include, but are not limited to, Apple Pay, Google Pay and Samsung Pay. As an entity that accepts bank cards as payment, UTA is expected to comply with the Payment Card Industry Data Security Standard (PCI-DSS). In an assessment of UTA's compliance with PCI-DSS standards, our card readers accepting this method of payment was identified as a potential risk. UTA would need to invest a minimum of \$1.5 million in new hardware and software to mitigate the risk. It was determined that rather than incurring these costs, UTA proposed to eliminate this payment option.

Mobile wallet applications and contactless bank cards were used an average of about 3,400 times per month in 2017, which equals roughly \$11,200 in electronic fares sales. There is an average of 709 distinct users of this payment method each month whom average five trips per month which accounts for approximately 0.15% of our ridership each year. The use of this method of payment has been generally stagnant since 2009 when the Authority launched its EFC system.

Those who use an NFC-enabled mobile wallet application must have the app installed on their device, set up an account and input credit card information in order to use this option. Once they have set up their device, they must then approach one of our card readers and tap their phone to the reader. In order to use a contactless bank card, the card must have the capability, which is most typically indicated by a  symbol on the card. The card is tapped on the card reader and the fare is charged directly to the card.

In determining the potential impacts on riders, other payment methods that are available as a direct replacement and did not require excessive steps or requirements were accounted for. UTA recently instituted a mobile app, UTA GoRide, which allows the purchase and use of fares. Much like with the mobile wallet apps, this app does require an account and a credit card be input before it can be used. UTA GoRide could replace the mobile wallet applications with a relatively simple and comparable setup process. Although the rider may need to download a different app, there is still a method to pay for fare through a smart phone. The impact should be minimal on those riders accustomed to paying for fare via their mobile device. The UTA Go Ride App method benefits the rider's financial security by not having to pull out a credit card to

tap on the reader and have that sensitive data transmitted each time it is used. It also eliminates the opportunity for the loss of a credit card by not securing it again.

When paying with a credit card, all locations with Ticket Vending Machines (TVM) have the option to pay for fare with a credit card at rail and Bus Rapid Transit (BRT) stations. It does require additional steps where the rider would need to interface with the TVM in order to purchase their ticket, but it is available at the place they board using the payment type they already use. Although this may require planning for the time it takes to use a credit card to purchase a ticket with the TVM, the option to pay with a credit card is still available. However, TVMs are only located on rail and Bus Rapid Transit (BRT) stations, whereas the card readers are presently on all buses. Those riders who use their contactless bank cards on buses would lose their ability to pay with a credit card by tapping the card reader with it. There is no way for UTA reader equipment to differentiate between those who would use the mobile wallet apps and those that use the contactless bank cards so there is no way to gauge the number of people who would not have the direct replacement of the UTA GoRide app, but would need to use a different fare payment method. UTA has proposed to eliminate a fare media that cannot easily be replaced by another payment method. The proposed elimination will be analyzed with specific emphasis on the impact to riders of bus in order to ensure that the change is not inadvertently discriminatory to minority and/or low-income populations.

Public Outreach

UTA held a public comment period from Jan. 4 to Feb. 13, 2018 to gather feedback on proposed changes to routes 833, 834, 840 and 864. All of these routes are operated out of UTA's Timpanogos Business Unit in Utah County. In addition to the changes being analyzed here, UTA had proposed to cancel Saturday service on the 833 and 834 which received negative feedback during the comment period and public meetings. The proposed changes on the 833 and 834 triggered a disproportionate burden on low-income populations while the proposed changes to the 833 triggered a disparate impact on minority populations. Due to the feedback received and Title VI implications, the proposed changes were withdrawn.

The required public notice was posted on rideuta.com, the State of Utah's Public Notice website, on the buses operating on the fixed route buses as well as on the paratransit vehicles that operate in Utah County. The notice was also printed in the Provo Daily Herald. Extra effort was made to reach out to customers utilizing paratransit that took Saturday trips on the routes where the service was proposed to be cancelled. This effort consisted of postcards being sent

directly to the homes and caregivers of impacted paratransit riders. The postcards detailed the proposed changes and offered a direct invitation to one of the two public hearings offered during the comment period. Ultimately, the proposals that impacted paratransit riders were cancelled. The first public hearing was held January 18 at the Provo City Library and the second was held January 29 at the Provo Recreation Center.

A total of 28 people attended the public hearings, and six comments were officially received for the public record throughout the comment period. One commenter (received via email) provided feedback in regards to the changes proposed for routes 863 and 864. The commenter suggested some adjustments to the proposal in order for transit to better accommodate his growing business. The commenter also offered to provide bus turnaround and pull out locations near his office building.

A total of five comments were received regarding the service proposal for route 833. Three comments were received by email and two by telephone. All comments were in opposition to the elimination of Saturday service on this route, mainly due to the negative impact this change would have on area paratransit customers. Additionally, at the public hearing held on January 29 those who attended were generally opposed to the changes for route 833. The negative comments were all regarding the changes that are no longer being proposed. Of the remaining changes, there has been no negative feedback.

UTA included the temporary elimination of route 840 in the comment period. This route is on the Utah Valley University campus and is proposed to be eliminated during the summer semester and has historically returned for spring semester. It has been proposed to not bring this route back, but will have a title VI analysis performed prior to a full elimination of the route.

Analysis of Proposed Changes

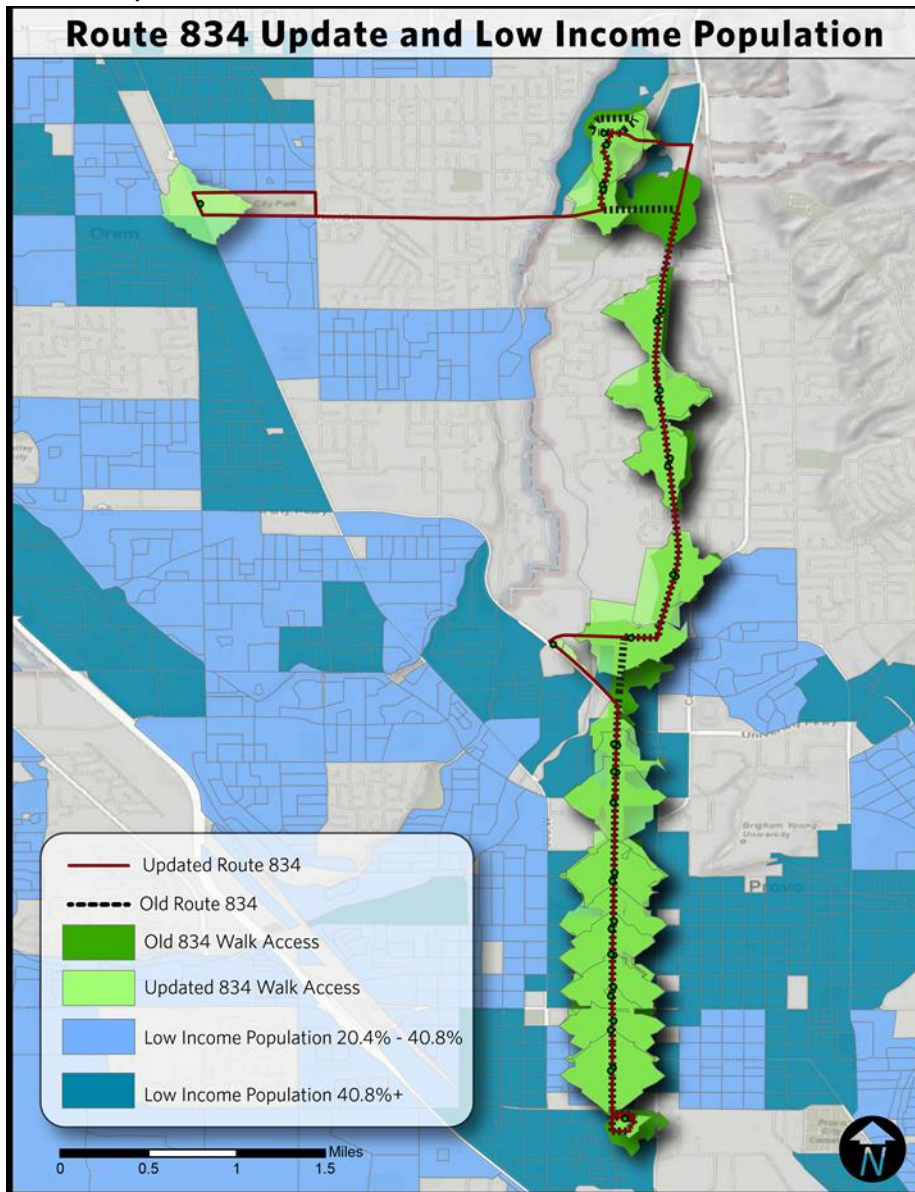
UTA is required to analyze the potential impacts of any major service change as it relates to low-income populations and minority populations. Pursuant to this requirement, UTA has created the following maps, tables and related data. The data in this section was compiled utilizing American Community Survey (ACS) 2011-2015 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups. This was done in order to use the smallest geographic area possible for the analysis. The distribution was dictated by population ratios from 2010 Census Data. Proposed service changes were analyzed based on the stops of the route. Fare media analysis was performed based on the location the fare media was used to board the transit vehicle. All stops and tap locations have had a one quarter mile radius applied to them based on the actual accessibility of the stop or tap location by road. Any census block that is overlapped by this walkability radius has its population included as those effected by the proposed changes. These aggregated numbers are compiled as a comparison group to the service area average to determine whether there would be a disparate impact on minority populations and/or a disproportionate burden borne by low-income populations.

The maps in this section will show the route, individual stops with a walkability radius, and census blocks with concentrations of low-income households or minority individuals above the system average, which are shaded according to density.

FTA Circular 4702.1B states that an increase or decrease of fares by media type requires that the “transit provider shall analyze any available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the... payment media that would be subject the fare change.” Since the fare media that has been proposed to be eliminated is such a small subset of riders, the most recent rider survey did not ask questions specifically about the use of contactless bank cards and/or smart phone payment apps. As such, the ridership data used in this analysis is of a broader group of payment types. Considering the limitations of the ridership data, UTA has also compiled and presented the locations where individual riders have initiated their trip and gathered the demographic information of those locations with a one quarter mile walkability radius using the same parameters stated above.

Route 834

Low-Income Analysis - Addition

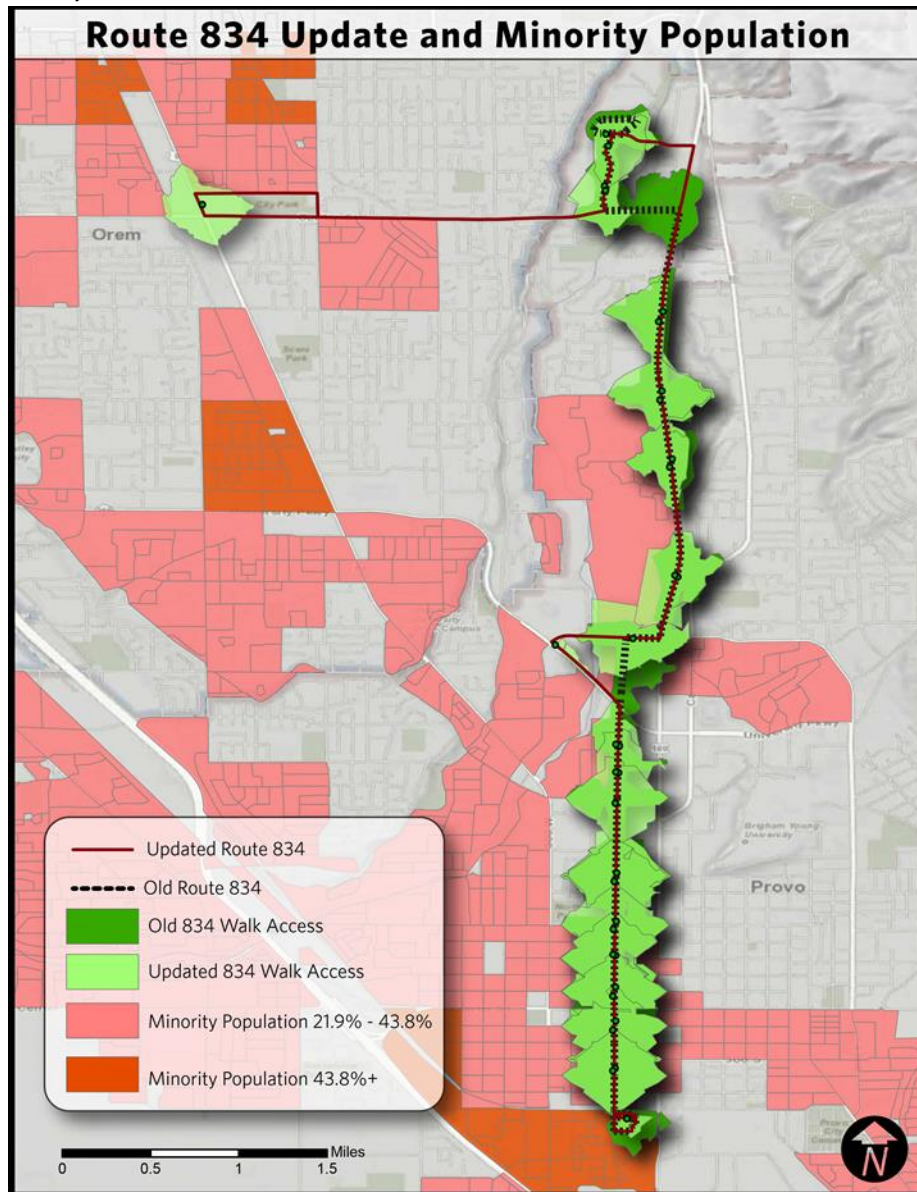


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 834 – Increased Access	
Total Population:	1,704
Low-income Population:	591
Percent low-income:	34.7% (14.3%)

The table and figure above show the stops and distribution of low-income populations that are *gaining access* as a result of the proposed changes. The low-income populations *benefitting from* this addition is 14.3% above the system average.

Minority Analysis - Addition

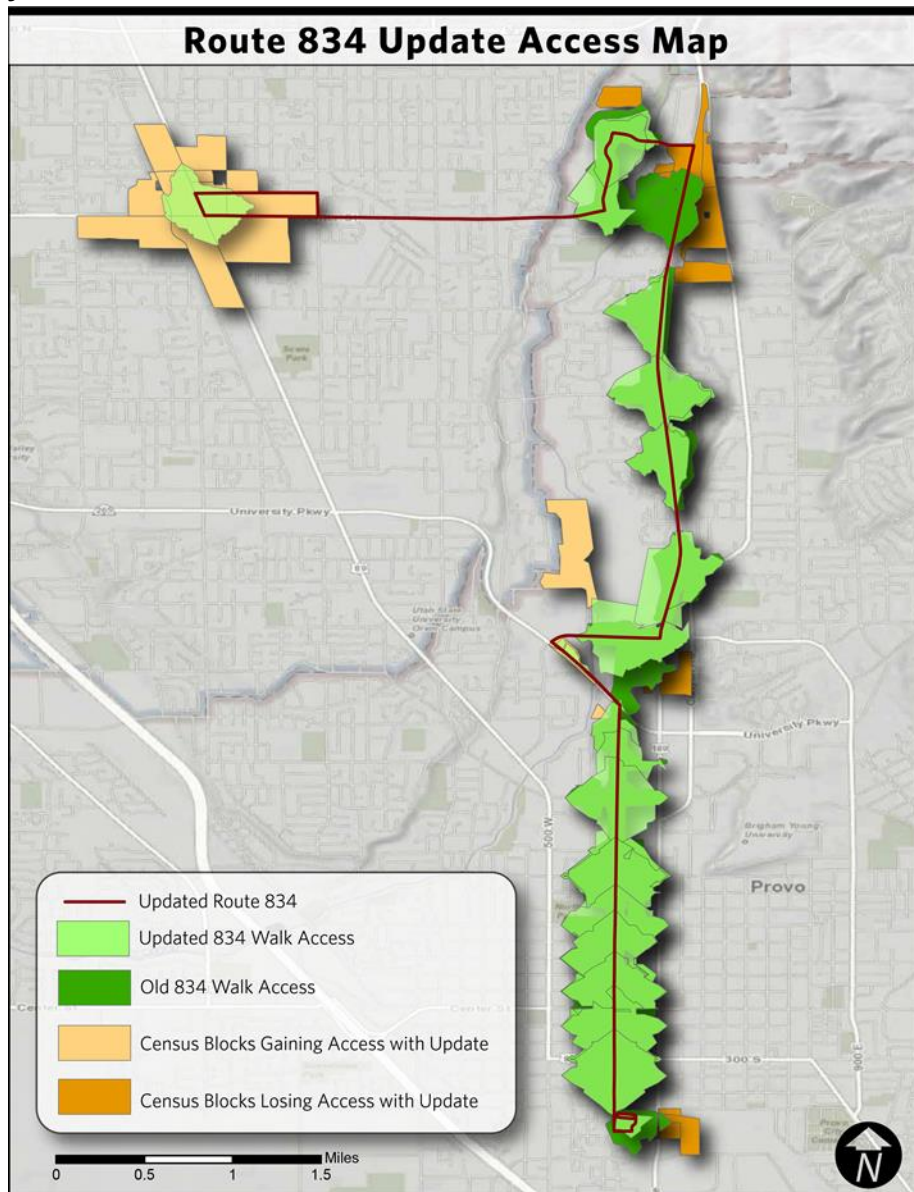


Minority System Average	
Total Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Route 834 – Increased access	
Total Population:	1,729
Minority Population:	472
Percent Minority:	27.3% (5.4%)

The table and figure above show the stops and distribution of minority populations that are *gaining access* as a result of the proposed changes. The minority populations *benefiting from* this addition is 5.4% above the system average.

Analysis of Lost Access



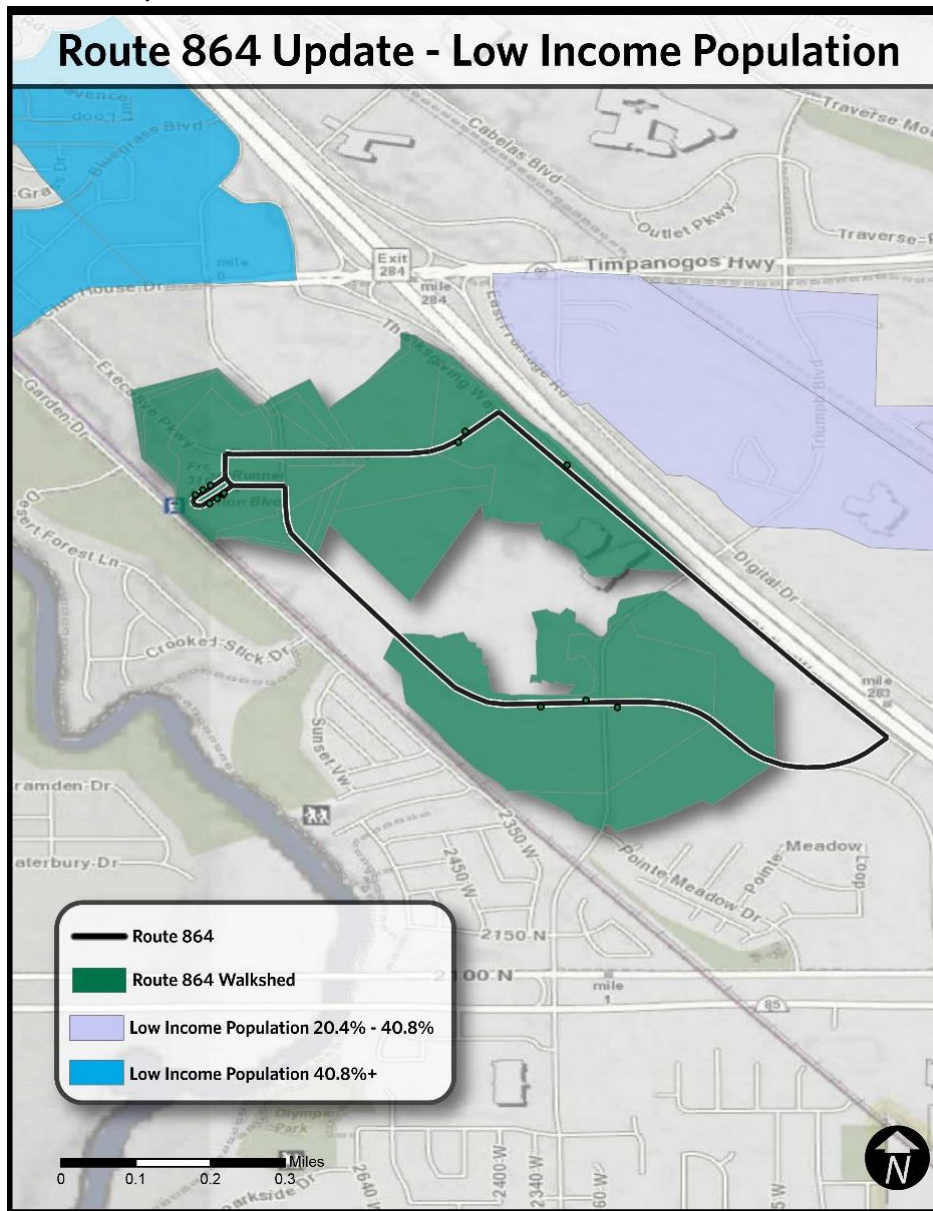
Minority Population Losing Access	
Total Population:	1,112
Minority Population:	147
Percent Minority:	13.2% (-8.7%)

Low-income Population Losing Access	
Total Population:	1,059
Minority Population:	296
Percent Minority:	27.9% (7.6%)

As stops have been eliminated, the map above show those who have both gained and lost access, with the table specifically focusing on those *losing access* to previous stops. The minority populations impacted by this addition is 8.7% below the system average and low-income is 7.6% above the system average.

Route 864

Low-Income Analysis

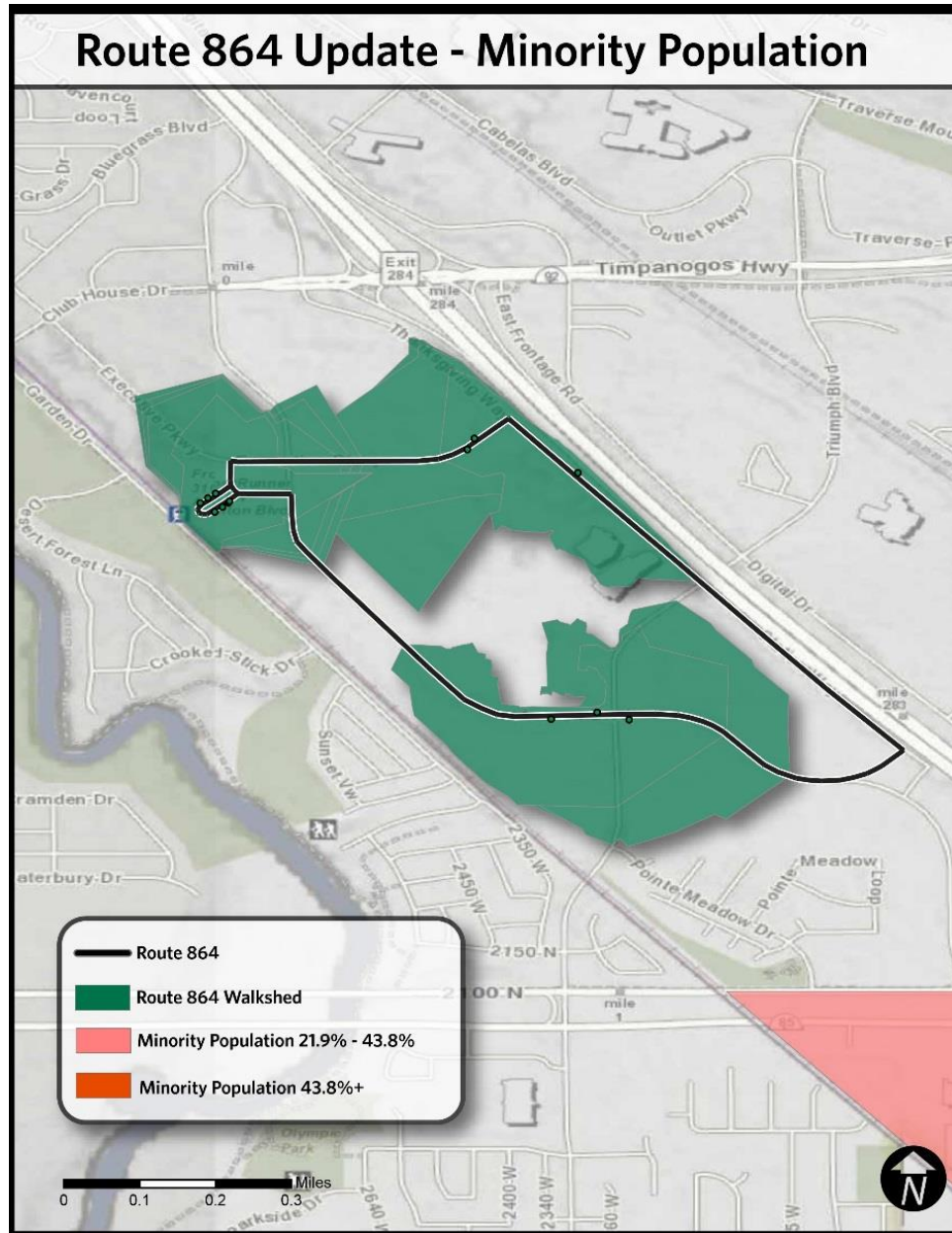


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 864	
Total Population:	583
Low-income Population:	72
Percent low-income:	12.4% (-9.5%)

As expressed in the table and figure above, the low-income populations impacted by this addition is 9.5% below the system average.

Minority Analysis

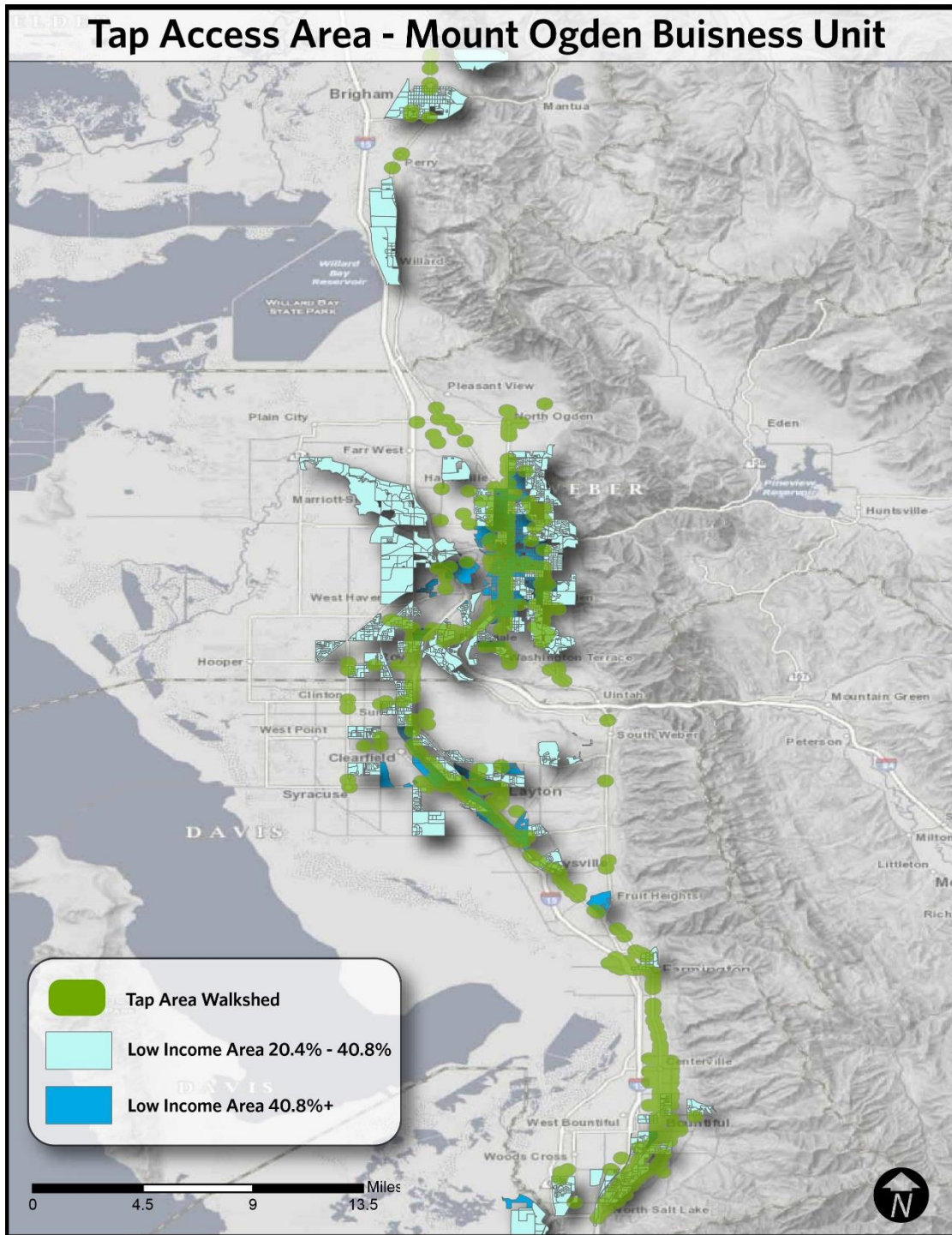


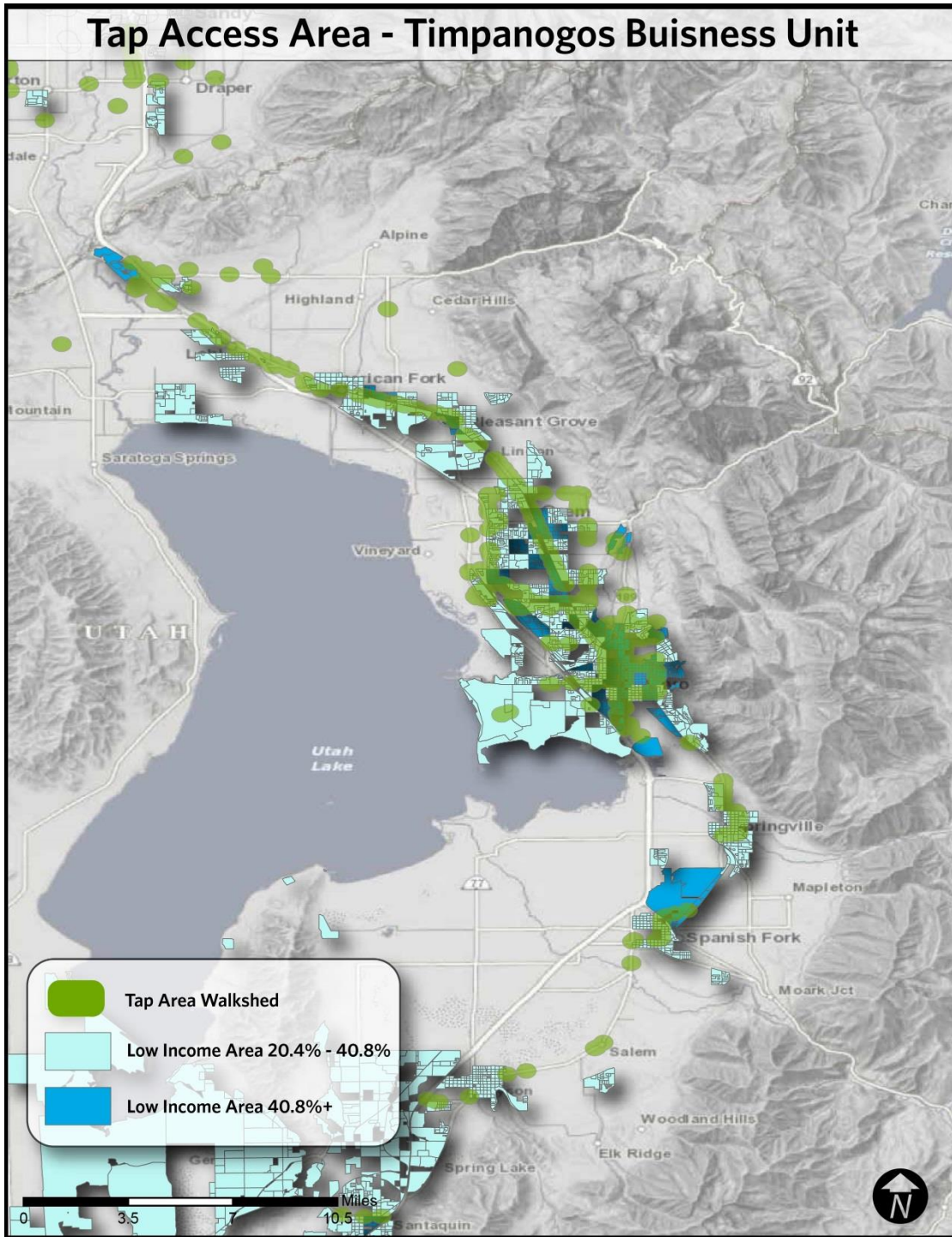
Minority System Average	
Total Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

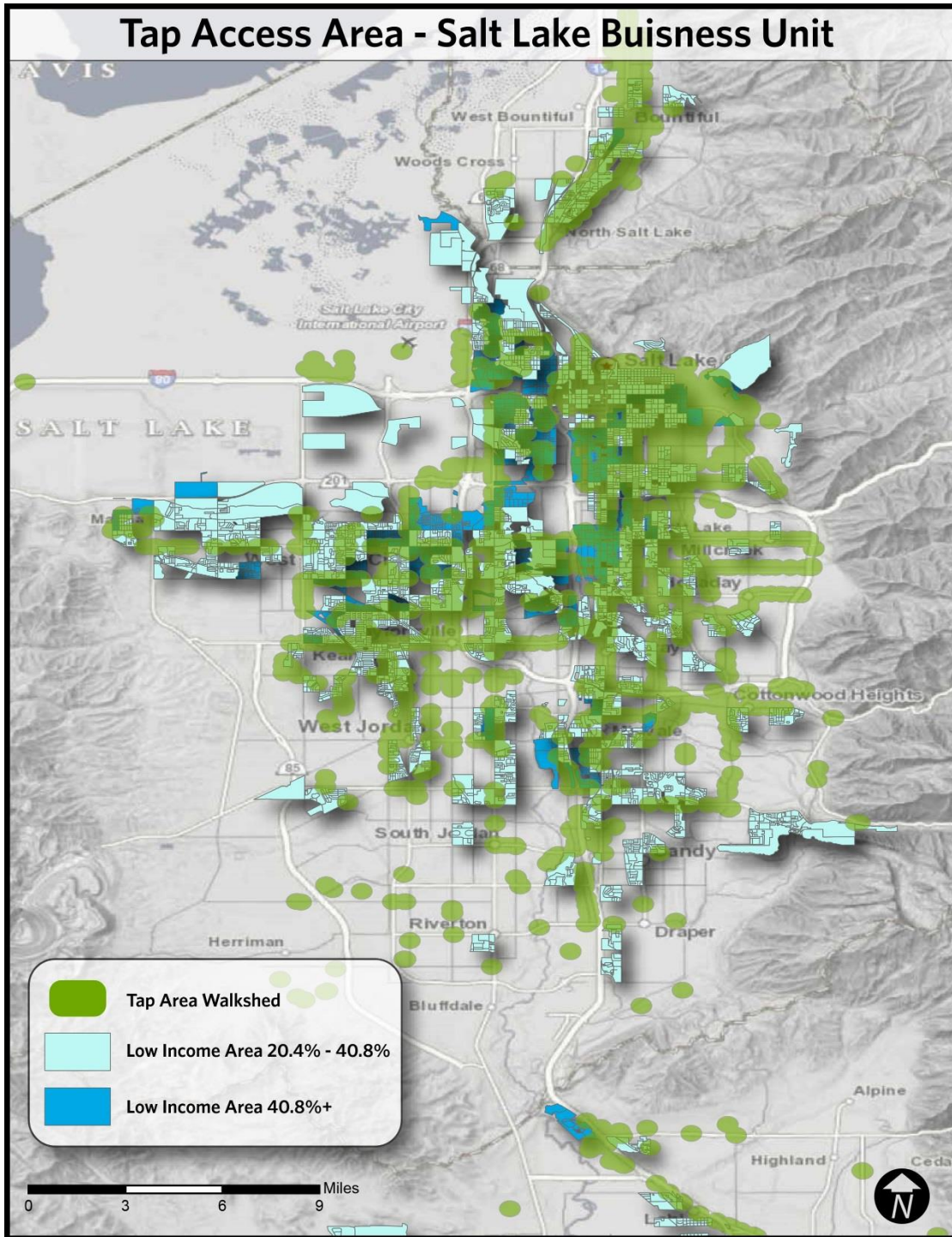
Route 864	
Total Population:	583
Minority Population:	91
Percent Minority:	15.7% (-4.7%)

As expressed in the table and figure above, the minority populations impacted by this addition is 4.7% below the system average.

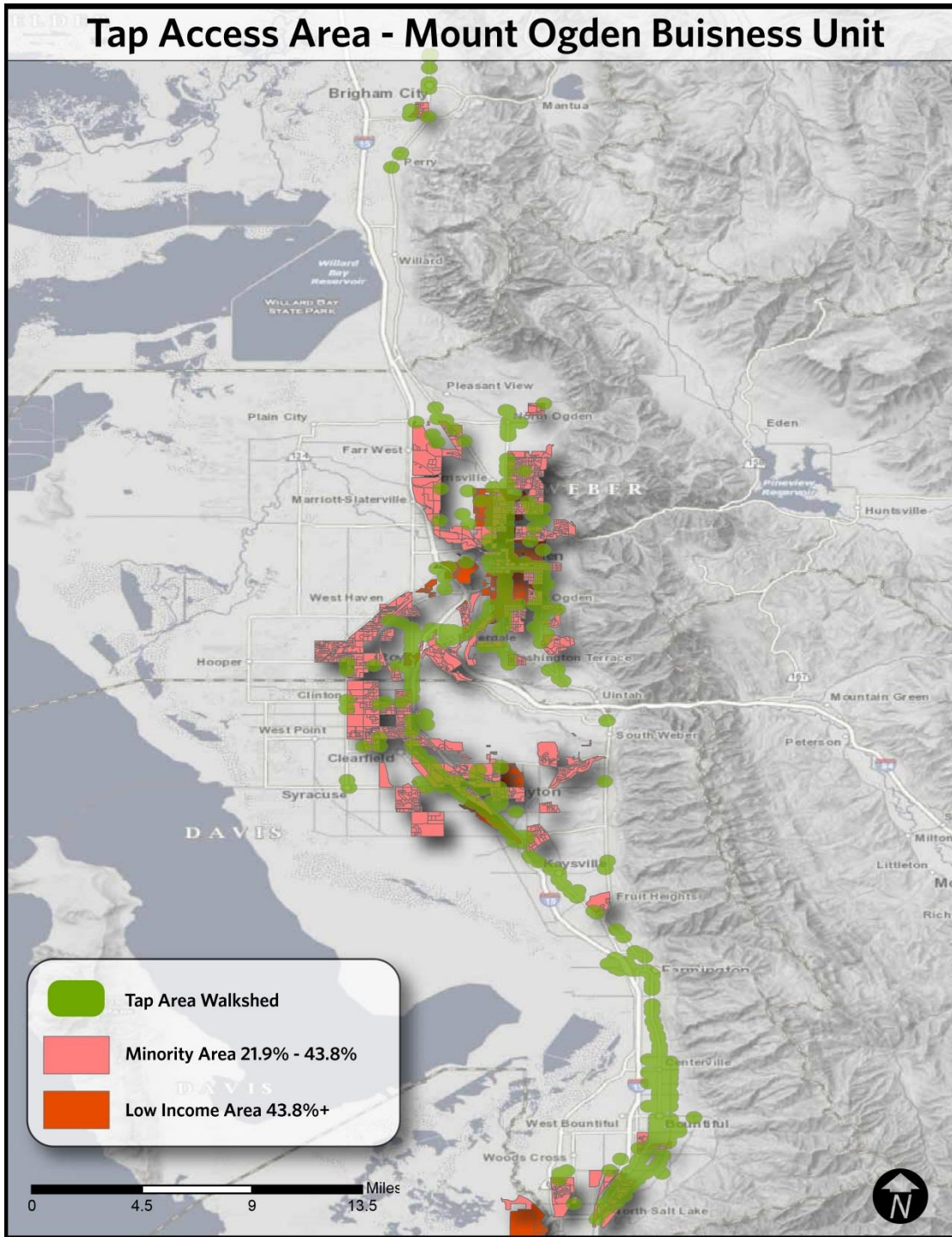
Removal of Fare Media
Low-Income Analysis

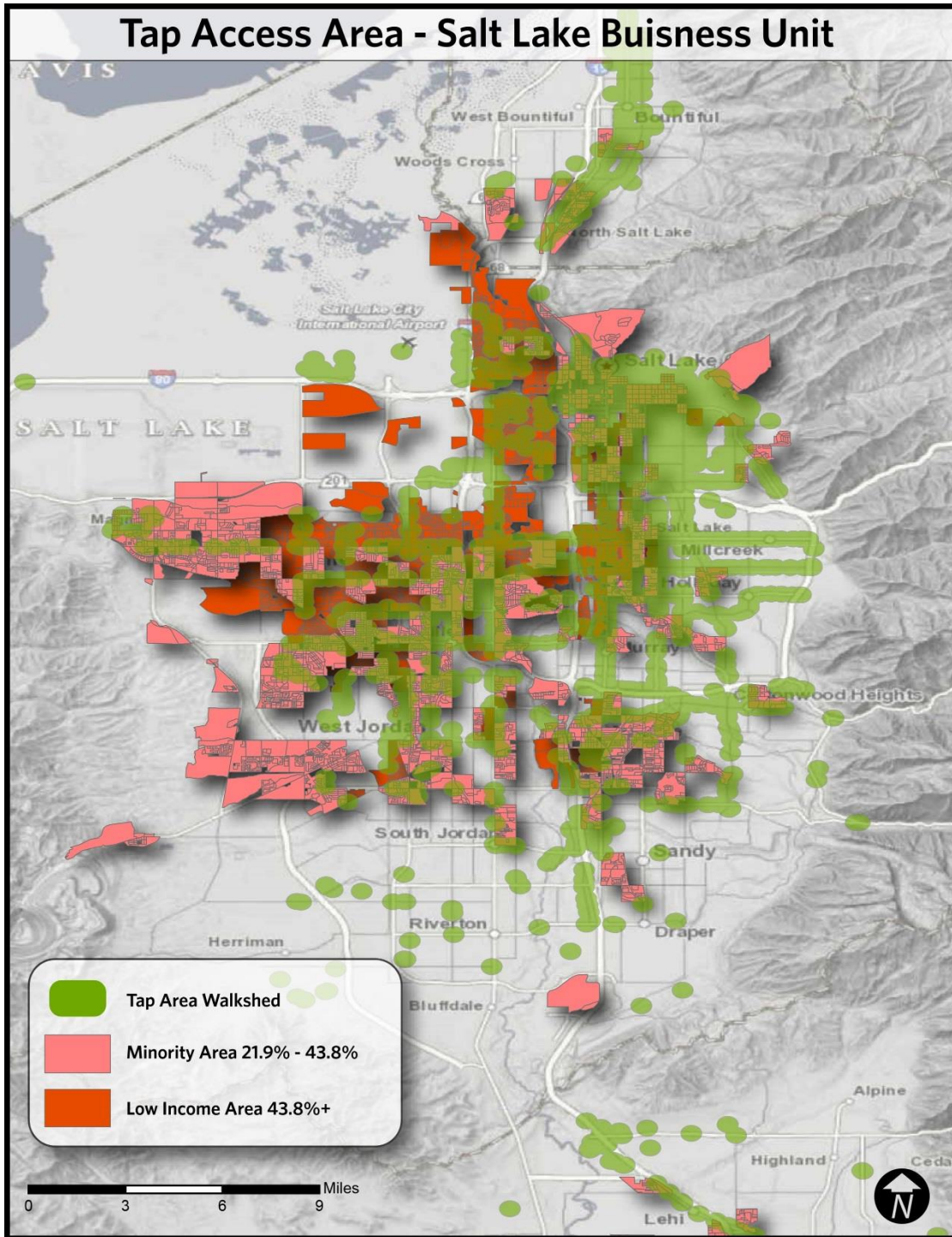




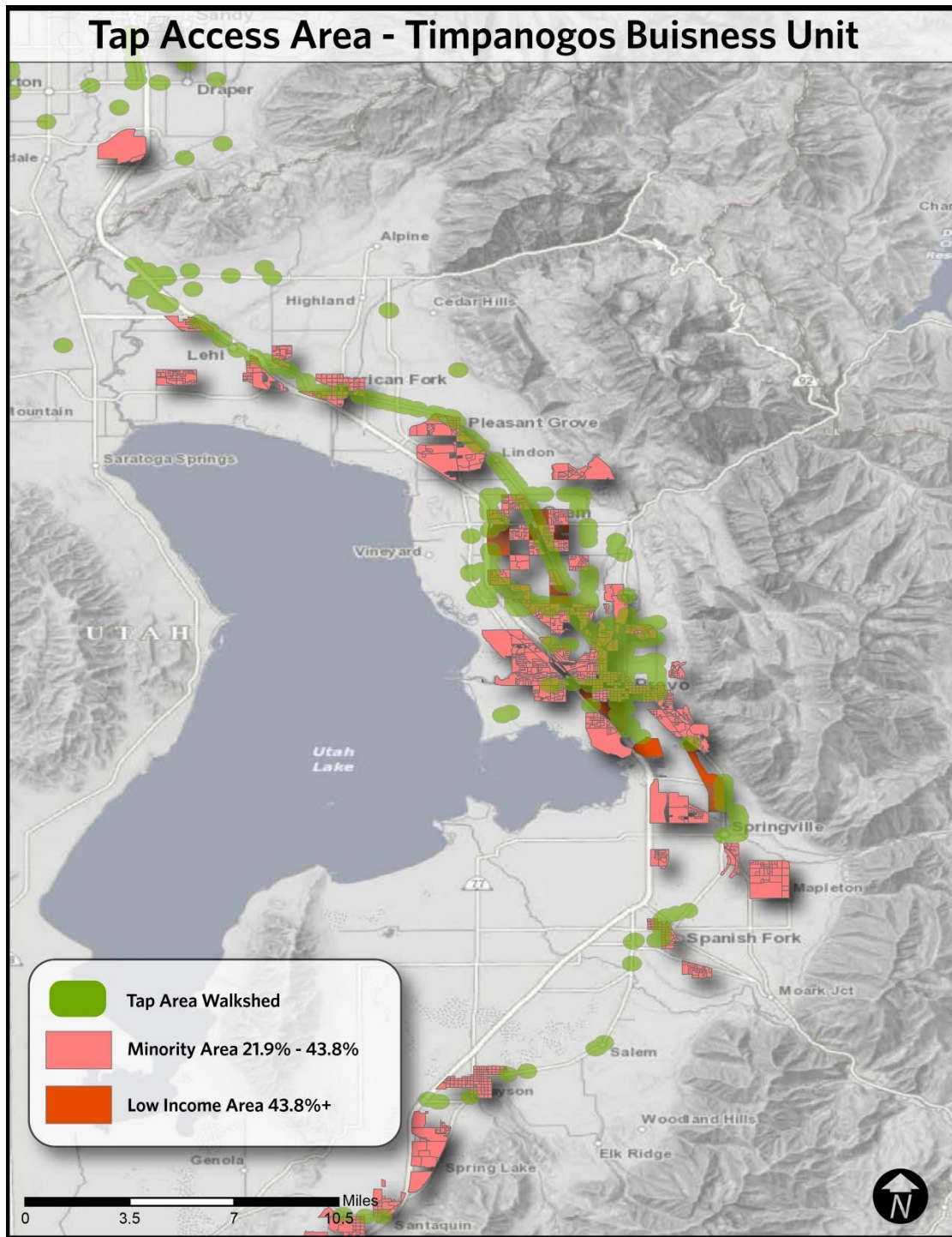


Minority Analysis





Minority Analysis Continued



Findings of Analysis

Routes 834 – Addition to Route

There were no findings of a disparate impact in this analysis, rather that minority populations would benefit by the rerouting and addition of service. The data did indicate that those potentially losing access to a stop were 7.6% greater than the system average, but the number of low-income populations that benefit from the addition is almost double the number of those losing access to a quarter mile walk radius. While the low-income populations may be required to travel further to a stop, the access to the route has not been altogether eliminated. With these considerations, UTA has determined that there were no disparate impacts on low-income populations from these changes.

Routes 864 – Addition of Route

There were no disparate impacts or disproportionate burden found in the analysis of this service change. While route 864 did have 9.5% less low-income in the impacted populations than the system average, UTA has determined that the addition does not meet UTA’s policy on disparate impact. The policy states that the changes must have a “5% worse” effect on protected populations. This addition does not *negatively* impact minority populations since there was no adverse effect such as a decrease in service to fund this new route.

Removal of Fare Media

In examining the demographics of the surrounding population around all of the stop locations where this method of payment was used, there *may* be a disparate impact but there was no indication of a disproportionate burden. As shown below, the low-income population is above the system average by 4.3%, whereas the minority population is 5.3% above the system average.

Minority Populations	
Total Population:	1,130,915
Minority Population:	307,981
Percent Minority:	27.2% (5.3%)

Low-Income Population	
Total Population:	1,109,296
Low-Income Population:	291,009
Percent Low-Income:	26.2% (4.3%)

While the demographic information indicates a disparate impact, there are several factors that UTA must account for before concluding there is a disparate impact, especially when examining stop-based demographic data. As mentioned previously, the actual number of people who use this method of payment is an average of 709 people a month with no way of differentiating

how many of these 709 people use a mobile phone app versus a contactless bank card on a bus, which is the only type of payment method that does not have a direct replacement with a TVM or UTA’s GoRide phone app.

The only data specific to this payment method available are the locations the card is being used. However, the usage location does not exclusively indicate the rider’s origin where demographics could potentially show ridership. The locations are mapped any time this payment method was used in the system, which includes any place of transfer and/or the start of a return trip. While this is the only data available, it does not show the actual rider’s demographics and casts too broad a net throughout the system to be reliable for such a small number of riders.

In UTA’s most recent ridership survey, where this fare payment method was classified as “Other electronic fare payment”, the demographics of those respondents using other electronic fare payment was 22.9% minority. There are, however, many other types of payment that could fall into this category and may not be a direct reflection of the proportionately small subset of those using mobile wallet applications and contactless bank cards. However, as a comparison group of the demographics of those that use electronic fare media, the results of the survey are included below. Note that ridership data is not compared to the system average as defined by the populous of the service area, but that it is compared to the demographics of our ridership data as collected from the survey.

Other EFC Ridership - Minority Populations	
Total Population:	3,274
Minority Population:	671
Percent Minority:	20.5% (-4.4%)

Other EFC Ridership – Low-income Population	
Total Population:	2,617
Low-Income Population:	843
Percent Low-Income:	32.2% (-12.3%)

If this data were to reflect the demographics of those using the payment method proposed to be eliminated, this would indicate that electronic fare media is used less by minority and low-income populations than the ridership average.

In spite of the tap location demographics, the small number of people using this fare payment method (0.15% of ridership) and the general demographics of riders who use other electronic fare media, UTA has determined that there is no disparate impact or disproportionate burden borne by minority or low-income populations.

Appendix A - April 2018 Change Day Public Comment Report

Utah County

Routes 833, 834, 840 and 864

Comment Period: 1/4/18-2/13/18

Prepared by Erika Shubin, UTA Public Hearing Officer

For April 2018 Change Day, the UTA Timpanogos (Utah County) Business Unit proposed changes for routes 833, 834, 840 and 864. The proposal for routes 833 and 834 included the elimination of two weekday trips due to schedule changes related to the implementation of Positive Train Control on FrontRunner and a discontinuation of all Saturday trips due to low ridership. The route 840 (a seasonal route) proposal called for the route to be discontinued and replaced by adding additional route 841 trips, and the route 864 is a proposed new route to serve the west side of I-15 near the Lehi Station.

Public Comments and Outreach

In accordance with UTA policy, a public comment period was held from Jan. 4 through Feb. 13, 2018. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- The public hearing notice was published in the *Provo Daily Herald*, on the state's public notice website and on rideuta.com. Information on the comment period and hearing was also published on UTA's social media channels. In addition, the UTA's Special Services business unit sent postcards to each impacted paratransit customer or to the customer's caregiver.
- Two formal public open houses were held. One open house took place Jan. 18 at the Provo City Library (550 North University Avenue in Provo, Utah), and the second took place Jan. 29 at the Provo Recreation Center (320 West 500 North in Provo, Utah). A total of 28 people attended the two hearings.
- Fliers were posted on select Utah County buses and on Utah County paratransit vehicles.
- Comments were accepted via UTA's website, via email at hearingofficer@rideuta.com, through the mail and by phone.

Overall, seven comments were received on all proposals. One commenter (received via email) provided feedback in regards to the proposed new route, route 864. The commenter suggested some adjustments to the proposal in order for transit to better accommodate his growing business. The commenter also offered to provide bus turnaround and pull out locations near his office building.

A total of six comments were received regarding the service proposals for routes 833 and 834 – four via email, one at the public hearing and one via telephone. All comments were in opposition to the elimination of Saturday service on these routes, mainly due to the negative impact this change would have on area paratransit customers. Additionally, at the public hearing held on Jan. 29, those who attended were generally opposed to the changes for route 833.

No comments were received regarding the proposed cancellation of route 840.

The proposed changes were as follows:

(From the public notice)

- Route 833: Elimination of two weekday trips due to schedule changes. All Saturday trips will be discontinued due to low ridership.
- Route 834: Elimination of two weekday trips due to schedule changes. Route will be extended to the intersection of Orem Center Street and State Street to allow for transfers to route 850 near Orem City Offices. All Saturday trips will be discontinued due to low ridership.
- Route 840: Route to be discontinued and replaced by adding additional route 841 trips. Proposed change will provide customers with more seat availability between the Orem FrontRunner Station and Utah Valley University.
- Route 864: This is a proposed new route to serve the west side of I-15 near Lehi Station. Route will be interlined with route 863 and will only offer weekday peak hour service.
- The proposed fixed bus route changes should be of interest to paratransit eligible riders. UTA is required to provide paratransit at a comparable level of service as to what is provided by the fixed route system. The public transportation guidelines of the Americans with Disabilities Act (ADA) require UTA to provide paratransit services only within a ¼ mile service corridor on either side of a fixed bus route and around a light rail (TRAX) station. UTA Paratransit must provide services during the same days and hours of operation as these fixed route services. Areas that would no longer have fixed bus routes would no longer have direct curb-to-curb paratransit services.

Outcome:

Based on the feedback received and other factors, the proposal for route 833 will not go forward. For route 834, the proposed alignment changes will proceed, but Saturday service will not be eliminated. Route 840 is seasonal service, and the route will be discontinued for the season but will not be permanently eliminated at this time as proposed, and the addition of route 864 will proceed as outlined. Service changes will begin April 8, 2018.

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE PROVO – OREM BUS RAPID TRANSIT
TITLE VI EQUITY ANALYSIS**

R2018-03-05

March 28, 2018

WHEREAS, the Utah Transit Authority (the “Authority”) is a public transit district organized under the laws of the State of Utah and was created to transact and exercise all of the powers provided for in the Utah Limited Purpose Local Government Entities – Local Districts Act and the Utah Public Transit District Act; and

WHEREAS, the Board of Trustees of the Authority (the “Board”), in keeping with the Federal Transit Administration’s requirements for public transit agencies and the Civil Rights Act of 1964 has considered and reviewed the Provo – Orem Bus Rapid Transit Title VI Equity Analysis (“Title VI Equity Analysis”) prepared by Authority staff; and

WHEREAS, the Board has desires to approve the Title VI Equity Analysis.

NOW, THEREFORE, BE IT RESOLVED by the Board of the Authority:

1. That the Provo – Orem Bus Rapid Transit Title VI Equity Analysis prepared by Authority staff, a copy of which is attached hereto as Exhibit A, is hereby approved by the Authority.
2. That the Board hereby ratifies any and all actions taken by the Authority’s President/CEO, General Counsel, and staff in furtherance of and effectuating the intent of this Resolution.
3. That a copy of this Resolution shall be submitted to the Federal Transit Administration.
4. That the corporate seal be attached hereto.

Approved and adopted this 28th day of March 2018.



Greg Bell, Chair
Board of Trustees

ATTEST:


Robert K. Biles, Secretary/Treasurer

(Corporate Seal)

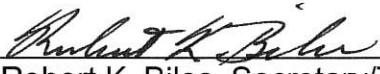


CERTIFICATE

The undersigned duly qualified Chair of the Board of Trustees of the Utah Transit Authority certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Board of Trustees held on the 28th day of March 2018.



Greg Bell, Chair
Board of Trustees



Robert K. Biles, Secretary/Treasurer

Approved As To Form:



Legal Counsel

Exhibit A



Executive Summary

RE: Title VI Analyses for April Change Day and Provo-Orem BRT

Introduction

Two service and fare equity analyses were conducted to review the proposed changes for April change day and the proposed changes associated with the Provo-Orem Bus Rapid Transit. The analysis was performed in accordance with Federal Transit Administration’s Circular 4702.1B, which outlines the Title VI requirements and guidelines for recipients of Federal Transit funds. Service and fare equity analyses are conducted to ensure that proposed changes to service and fares do not inadvertently negatively impact minority or low-income populations. All major changes, even if they appear to be neutral, are analyzed.

UTA has specific parameters set in policy to define the parameters used to determine the demographics of those impacted by the proposed fare and service changes. Impacted populations are compared to the population of the service area to measure whether minority and/or low-income populations are negatively impacted at a greater rate. If negative impacts exceed 5% of the comparison group, UTA takes all prescribed and prudent steps to ensure services are equitable and compliant with federal guidelines and requirements. The Authority has defined the parameters for what would trigger additional steps as a 5% negative impact and analyzes the impacts on minority and low-income populations separately. A greater than 5% impact would trigger a finding of either a Disparate Impact, which would be if the finding is regarding minority populations, or a Disproportionate Burden, which would be a finding regarding low-income populations.

Proposed Changes – April Change Day

Major Changes

Route	Change
834	Extend route from Riverwoods to State St/Center St in Orem
864	New route serves Thanksgiving Point area

Fares Change	Eliminate contactless bank cards and NFC-enabled mobile wallet applications (Apple Pay, Google Pay, etc.) as payment method on card readers. Accounts for only .15% of fare revenue.
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Proposed Changes – Provo-Orem Bus Rapid Transit

Changes to Parallel or Connecting Service

Route	Change
811	Route will no longer service Mt. Timpanogos Transit Center
821	Route will serve State St, 300 South in Provo instead of East Bay area
830	Route replaced by BRT
838	Route replaced by BRT
840	Route acts as a UVU campus shuttle. Proposed to be eliminated. All stops covered by route 841
850	Route will no longer service Mt. Timpanogos Transit Center
862	Route extended to Orem FrontRunner Station; route will no longer service Mt. Timpanogos Transit Center

Additional Proposed Changes

Route	Change
821	Route serves Payson, Salem, Spanish Fork, to Provo via I-15 (Springville portion of route to 823)
823	Route serves Springville, South Provo (created from 821)
846	Route will serve Orem 800 East, Orem 800 North, Geneva Rd, Vineyard (created from 862)
849	Route will serve UVU, Orem 1200 West, Orem 1600 North (created from 862)
862	Split into routes 846, 849

Findings – April Change Day

The service and fare equity analysis of the proposed addition to route 834, the addition of route 864, and the removal of a fare media *resulted in no findings*.

Findings – Provo-Orem Bus Rapid Transit

The proposed changes for the Provo-Orem BRT system will not be implemented until August change day. However, the FTA requires that these proposed changes be analyzed for Title VI prior to the beginning of revenue operations. Therefore, the following routes have had a service and fare equity analysis conducted in anticipation of the August change day schedule. Some of these changes are dependent on available funding and may or may not be implemented depending on the actions of the UTA Board of Trustees.

The service and fare equity analysis of the Provo-Orem BRT replacement of route 830 and 838 *resulted in no findings*. Of the other proposed changes, there were findings on the following routes:



Route 821 Realignment – Disparate impact *and* disproportionate burden. The realignment removes service from an area with a large percentage of low income and minority populations. However, the new route increases the population with access to the route 13 times. Those with increased access are more than twice the system average in low-income and 10.5% over the system average for minority populations. Additionally, the populations losing access to the 821 would gain access to the Provo-Orem BRT which connects them to the new alignment.

Route 840 Elimination –There is a finding of disproportionate burden. The low-income population in the area is 16.2% greater than the system average. The 840 route is a shuttle service that circulates around the campus of Utah Valley University. This route does, however, have low ridership and the plan to reallocate the operations budget from the 840 into the 841, which stops at all the same stops, is a substantial and legitimate business reason to proceed with the proposed changes. The 841 has 12 times the amount of ridership and brings riders from the Orem Central Station onto the UVU campus instead of only running on campus as the 840 does.

Creation of two routes from Route 821 – There is a finding of disproportionate burden. The proposal is to eliminate 9 stops in a low-income population in an area that is 16.2% greater than the system average. The underutilization of the stops being eliminated and the potential gains by offering more expedited service and more service in Spanish Fork was determined to be a substantial and legitimate business reason to proceed with the proposed changes.

Title VI Service and Fare Equity Analysis

Provo-Orem Bus Rapid Transit

Utah Transit Authority

Prepared by: Andrew Gray

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Utah Transit Authority has committed to the Federal Transit Administration's (FTA) Title VI objectives set forth in Circular 4702.1B ensuring that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.

The following analysis is of proposed changes to be implemented in August of 2018. These changes are being proposed to improve service delivery and connectivity throughout Utah County locations, including two major universities. Though the proposed changes are facially neutral, this analysis, in accordance with FTA requirements, will ensure that these changes will not have disproportionately negative impacts on minority and low-income populations within UTA's service area. If these changes are found to be discriminatory, UTA will take all prescribed and prudent steps to ensure services are equitable and compliant with federal guidelines and requirements.

FTA Circular 4702.1B specifically requires "transit providers that have implemented or will implement a New Start, Small Start, or other new fixed guideway capital project *shall conduct a service and fare equity analysis. The service and fare equity analysis will be conducted six months prior to the beginning of revenue operations* [emphasis added], whether or not the proposed changes to existing service rise to the level of 'major service change' as defined by the transit provider. All proposed changes to parallel or connecting service will be examined. If the entity that builds the project is different from the transit provider that will operate the project, the transit provider operating the project shall conduct the analysis. The service equity analysis shall include a comparative analysis of service levels pre-and post- the New Starts/Small Starts/new fixed guideway capital project. The analysis shall be depicted in tabular format and shall determine whether the service changes proposed (including both reductions and increases) due to the capital project will result in a disparate impact on minority populations. The transit provider shall also conduct a fare equity analysis for any and all fares that will change as a result of the capital project."

Pursuant to this guidance and requirement, UTA has conducted this Service and Fare Equity Analysis for the Provo-Orem BRT fixed guideway project and related changes. It is with the express permission of the Federal Transit Administration that UTA brings the analysis before the board five months prior to the beginning of revenue operations.

Summary of Proposed Changes

Provo-Orem Bus Rapid Transit:

Utah Transit Authority will begin operation of the Provo-Orem Bus Rapid Transit (BRT) in August of 2018. The proposed Provo-Orem BRT will serve Utah Valley University, Brigham Young University, Downtown Provo, two malls, two commuter rail stations and several other key locations throughout Provo and Orem. Peak headways are proposed at 6 minutes and will have increased amenities both at stops and on the transit vehicle itself.

Changes to Parallel or Connecting Service

As the Provo-Orem BRT is completed, it will replace the existing routes 830 and 838's. It will also absorb their operational budget. The 830 presently runs nearly the exact routing as the proposed BRT line from the Orem FrontRunner commuter rail station to the Provo station. The 830 has 15 minute headways. The 838 runs from the Provo station and connects the University mall and the East Bay Technology Park and runs three times in the morning and three times in the evening. The transition will decrease the number of stops on both of these routes.

Routes 830, 811, 850 and 862 currently service the Mount Timpanogos Transit Center, which is a quarter mile away from a proposed BRT Station. The 830 stop at this location will not be replaced by the Provo-Orem BRT. Routes 811, 850 and 862 will be moving stop locations to more efficiently interface with the new BRT station. Route 862 had s proposed alignment change to better interface with the Provo-Orem BRT and provide better service.

Additional Proposed Changes

The Utah Transit Authority has proposed two other changes that may be approved to come into service at the same time that the Provo-Orem BRT will. These changes are pending budgetary approval, but are included in this analysis in order ensure Title VI requirements are incorporated in the decision making process. They will increase and target service to communities in the Utah Valley in an effort to increase access and ridership.

Fare Considerations

There is a proposal from the Mountainland Association of Governments to provide a sponsored fare for the Provo-Orem BRT which would be at no cost to the individual rider. Sponsorship would pay what would have been collected through farebox recovery.

UTA Policy and Definitions

UTA has developed corporate policy 1.1.28 Title VI Compliance Policy to define and evaluate the impacts of proposed major services changes on minority and low-income populations in conjunction with a public outreach process. In developing this policy, UTA solicited feedback through newspapers within the service area, published on UTA's website (rideuta.com), and Utah's government website in the public notices section (Utah.gov) which provides translation options. In conjunction with the Salt Lake County Office of Diversity Affairs, which maintains an email list of local entities and individuals with interest in diversity issues, UTA sent an email notification soliciting feedback in the development of this policy. Additional targeted outreach was done, which included mailing a letter and the policy or sending emails to community organizations that work with minority or low-income populations.

The following references to policy are from subsections of corporate policy 1.1.28 and were created to ensure that all equity analyses are performed using the same parameters and are in line with FTA Circular 4702.1B.

Definitions

- A. *"Disparate Impact"* refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- B. *"Bus Rapid Transit (BRT)"* refers to a high-quality bus-based transit system that delivers fast and efficient service that may include dedicated lanes, busways, traffic signal priority, off-board fare collection, elevated platforms and enhanced stations. Since BRT contains features similar to a light rail or subway system, it is often considered more reliable, convenient and faster than regular bus services. With the right features, BRT is able to avoid the delays that can slow regular bus services, like being stuck in traffic and queuing to pay on board.
- C. *"Disproportionate Burden"* refers to a neutral policy or practice that disproportionately affects the low-income population more than non-low-income populations.
- D. *"Low-income Population"* refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/ transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

- E. "Minority Person" include the following:
1. American Indian or Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
 5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- F. "Minority Population" means any readily identifiable group of minority persons who live in geographic proximity.
- G. "National Origin" means the particular nation in which a person was born, or where the person's parents or ancestors were born.
- H. "System Average" The system average is the averages of minorities and low-income persons within the total populous of the geographic regions UTA serves. The present system averages are expressed below in tabular format using 2011-2015 5-year population estimates provided by the American Community Survey (ACS).

<i>Low-Income System Average:</i>	
Population:	2,243,746
Low-Income Population:	457,949
Percent Low-income:	20.4%

<i>Minority System Average:</i>	
Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Major Service Change

UTA will consider the following types of changes to be "major changes", which require public input and a Title VI equity analysis in compliance with FTA's Circular 4702.1B

- a) The Addition of Service;
- b) A proposed service level reduction in miles, hours, or trips of thirty three percent (33%) or more of any route;
- c) The elimination of all service during a time period (peak, midday, evening, Saturday, or Sunday);

- d) A proposed twenty-five (25%) or greater change in route alignment;
- e) A proposed fare change.

Evaluation and Analysis of Service and Fare Changes

1. UTA will analyze proposed major changes to service and any proposed fare changes in accordance with FTA's Circular C 4702.1B as amended.
2. UTA will evaluate the impacts of all major service changes cumulatively when there is more than one route being affected for a service change period
3. UTA will primarily utilize American Community Survey (ACS) Data, block group data and/or ridership data to evaluate and analyze any proposed major service and fare changes. This data will be analyzed with Geographic Information System (GIS) software.
4. UTA will rely on population data and use the smallest geographic area that reasonably has access to the stop or station effected by the proposed major service change. This will be translated into a one-quarter mile radius to a bus stop, one-half mile to a light rail station and three miles to a commuter rail station.

Disparate Impact and Disproportionate Burden

1. UTA will measure the burdens of service and fare changes on minority riders to determine when minority riders are bearing a disparate impact from the change between the existing service or fare and the proposed service or fare.
2. UTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service or fare and the proposed service or fare.
3. A threshold of 5% will be used to determine disparate impact on minority populations and disproportionate burden on low-income populations. This 5% is based on the margin of error from the US Census data that UTA uses to determine the populations in the service area. This means that if the burden of the service or fare change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, then the change will be considered either a disparate impact or a disproportionate burden.

Finding a Disparate Impact

1. At the conclusion of UTA's Analysis, if UTA finds a disparate impact on the basis of race, color, or national origin, UTA shall seek to modify the proposed changes in a way that will mitigate the adverse effects that are disproportionately borne by minorities.

Modifications made to the proposed changes must be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts.

2. If UTA chooses not to alter the proposed services changes despite the potential disparate impact on minority populations, or if UTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service or fare change, UTA may implement the change only if:
 - a. UTA has substantial legitimate justification for the proposed change; and
 - b. UTA can show that there are no alternatives that would have a less disparate impact on the minority riders but would still accomplish the transit provider's legitimate program goals. In order to show this, UTA must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative

Finding a Disproportionate Burden

If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. UTA will also describe alternatives available to low-income passengers affected by the service changes.

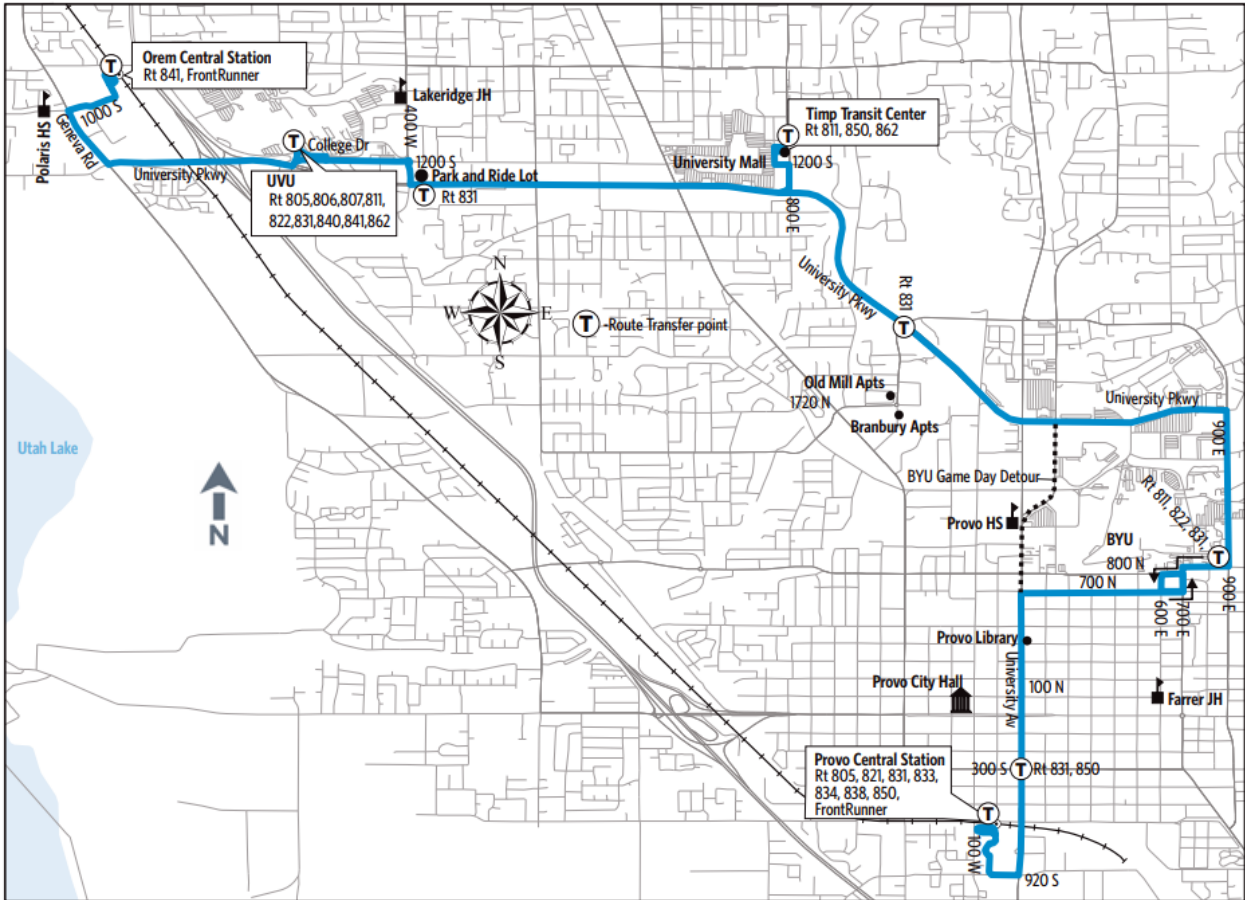
Proposed Changes

Provo-Orem BRT Replacement

Route 830 - Removal

Route 830 runs from the Orem Central Station, which is serviced by the commuter rail FrontRunner, through Orem and Provo connecting Utah Valley University and Brigham Young University and ends at the Provo Central Station. According to the 2015-2016 on board survey conducted by UTA, this route is largely ridden by students going to and from class (54% of riders surveyed). 73% of riders also reported that transit was their only method of travel other than walking to get where they were going, making this route crucial for many people. In calendar year 2016, this route averaged 2,380 boardings per day and is the second most utilized route in the Timpanogos Bus Unit. This route will be eliminated and immediately replaced with the Provo-Orem BRT.

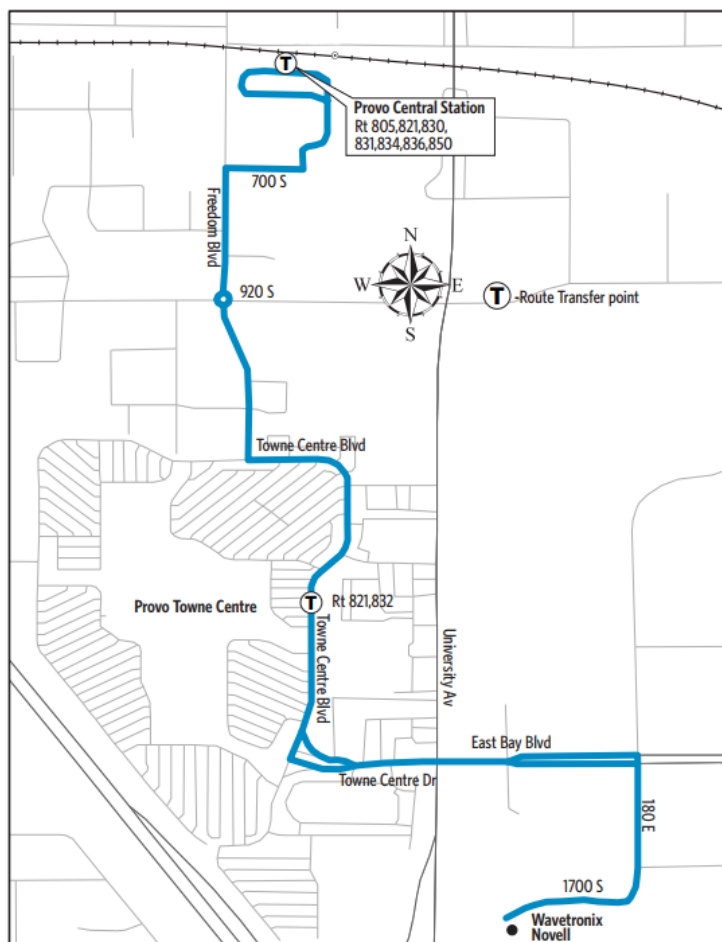
Route 830-Provo/Orem FrontRunner Connector



Route 838 – Removal

Route 838 runs six times per day, three in the morning and three in the afternoon. The schedule is shown below. This route averages 42 boardings per day and is primarily focused on connecting the FrontRunner station to shopping and employment destinations. The 838 will be replaced by the Provo Orem BRT. The route of the Provo-Orem BRT will not follow the exact path of the 838 it is replacing, but it will provide ample opportunity through similar stop locations and an additional stop on the southern end of the East Bay Technology Park to get to and from the same locations with increased service.

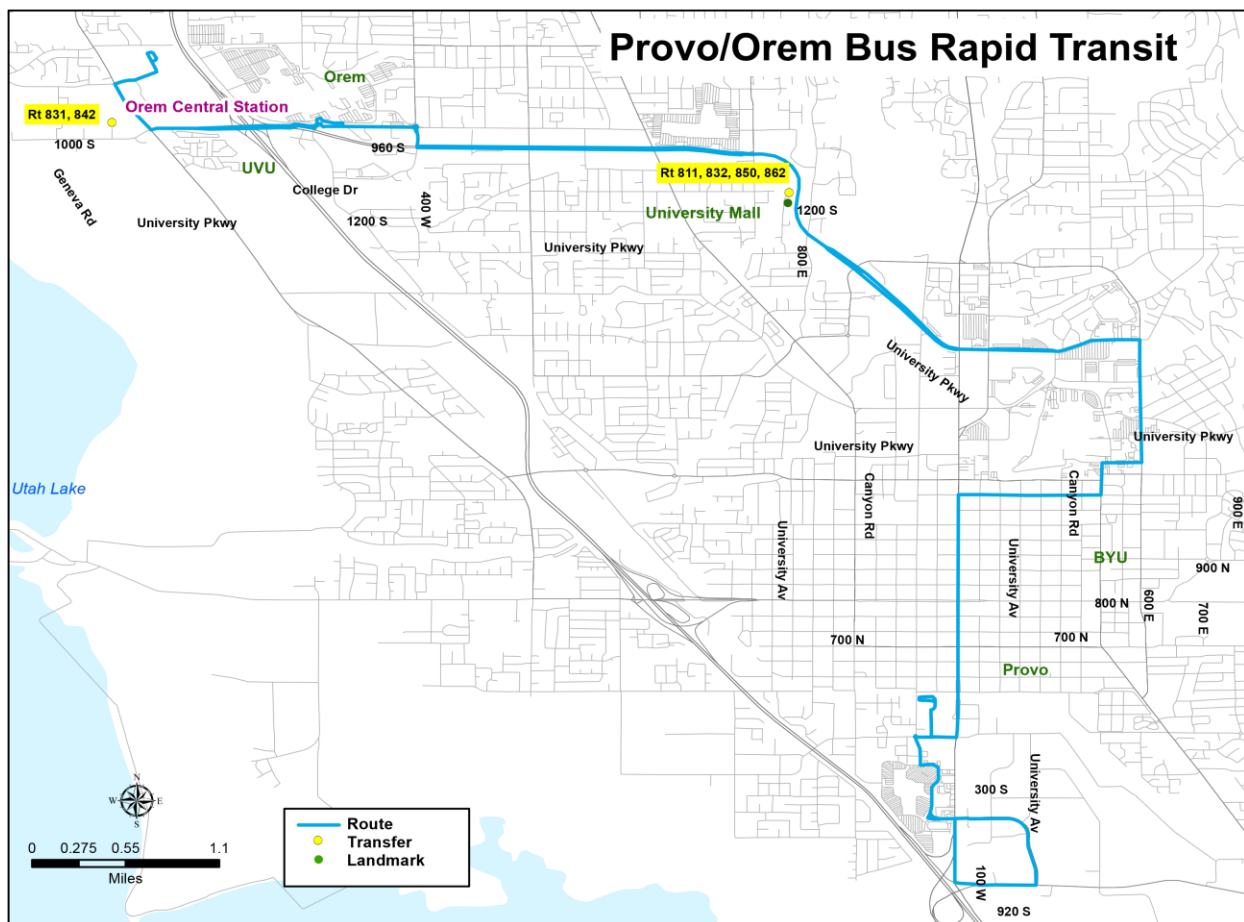
Route 838-East Bay



Provo Central Station	Provo Towne Centre Mall	East Bay	Provo Towne Centre Mall	Provo Central Station
747a	751a	753a	756a	800a
817	821	823	826	830
847	851	853	856	900
429p	433p	435p	438p	442p
459	503	505	508	512
529	533	535	538	542

Provo-Orem BRT - Addition

The proposed Provo-Orem BRT will serve Utah Valley University, Brigham Young University, Downtown Provo, two malls, two commuter rail stations and several other key locations. Residential density in key sections of the project is the highest in Utah outside downtown Salt Lake. However, the area was designed with insufficient highway capacity, and what capacity exists is now overwhelmed. At peak hours, University Parkway and University Avenue both have very long wait times, with traffic waiting 2-4 cycle lengths just to reach the front of the line. In that environment sits Route 830, the most heavily used in the county in terms of passengers per mile, but it is stuck in the same traffic.

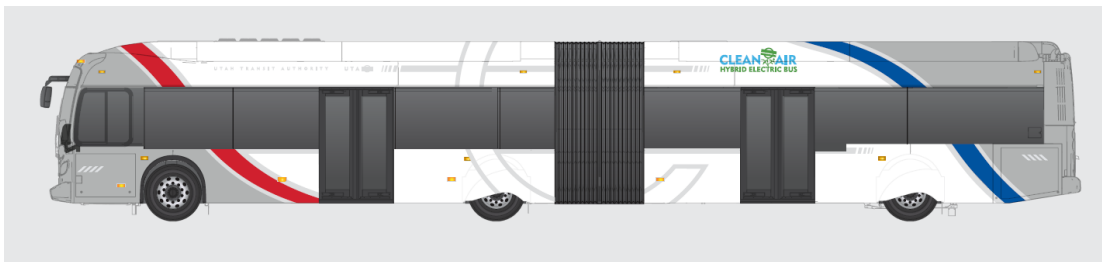


There is market demand to intensify and redevelop the corridor. There is room to widen, and giving another lane to vehicles is one option for creating capacity needed to serve emerging redevelopment, but this is a temporary solution that may encourage more auto dependency. The more sustainable solution is the congestion free transit that bus rapid transit would offer. 51% of the Provo-Orem BRT's route will offer dedicated lanes that regular traffic will not be

able to access. In addition, UTA will include GPS in the buses that will interface with stop lights that will prioritize any transit vehicles running behind schedule. In a travel forecasting report conducted jointly by Metro Analytics and the Wasatch Front Regional Council, it was estimated one-way boardings will be around 12,000 per day which will greatly benefit both the community utilizing the Provo-Orem BRT and decrease traffic for those not riding this service.



In addition to a dedicated lane, UTA will be constructing stations much like a light rail which will decrease wait time. An artist's rendering is shown above of the Provo Library Station concept. This illustration shows seating, shelter, garbage receptacles, card readers and TVMs. The Authority has also ordered 25 articulating buses, 18 of which will be in service at any time. These buses will provide ample seating and near level-boarding from stations. As shown in the image below, they have five doors to accommodate center platform stations in the middle of the road (as shown in the image above) and side platform stations with one station on each side of the road.



Fare Considerations

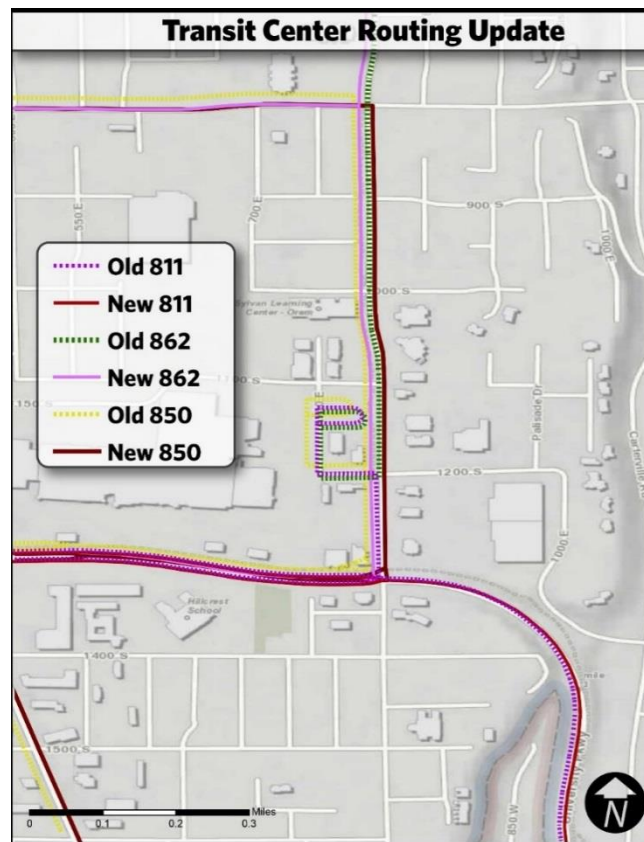
Mountainland Association of Governments (MAG) has expressed interest in allocating funding to sponsor the fare of the Provo-Orem BRT. This fare sponsorship would require no fare to be paid by the individual rider, but would be paid on their behalf by MAG. If this proposal is not approved, UTA may offer no cost to riders as a promotional fare with no plans to have this exceed the six month promotional fare period. If, for any reason, the promotional fare period is going to be exceeded, UTA will conduct a fare equity analysis before it becomes the permanent fare in accordance with UTA policy and FTA requirements.

Mt. Timpanogos Transit Center – Stop Relocation

The Mount Timpanogos Transit Center is located at 1145 South 750 East, just east of the University Place Mall. The routing requires the present service on the 830 to divert from University Parkway, turn at the light, stop at the transit center, then proceed south ultimately taking another turn to get back onto University Parkway. A map is shown below. Eliminating this detour will make the Provo-Orem BRT more efficient. A station will be placed on University Parkway less than a quarter mile away from the Mt. Timpanogos Transit Center.



In response to this, there will also be a need to modify other routes servicing the Transit Center in order to increase connectivity to the Provo-Orem BRT. Routes 811, 850 and 862 will have their trips to the Mount Timpanogos Transit Center adjusted to meet the nearest Provo-Orem BRT station. The 811 will stop along University Parkway and *not* proceed north to the transit center. The 850 will stop at the BRT station and not turn into the transit center. The 862 will proceed south on 800 East, West on University Parkway and go around the block utilizing State Street and 800 South. UTA considers these changes included in the stop to station comparative analysis of the 830 removal as these other routes have the same populations impacted as those of the 830. Additionally, stops along the 862 are listed as mitigation in this area as it connects northern riders to the new BRT Station. See below for a map illustrating the new routing.

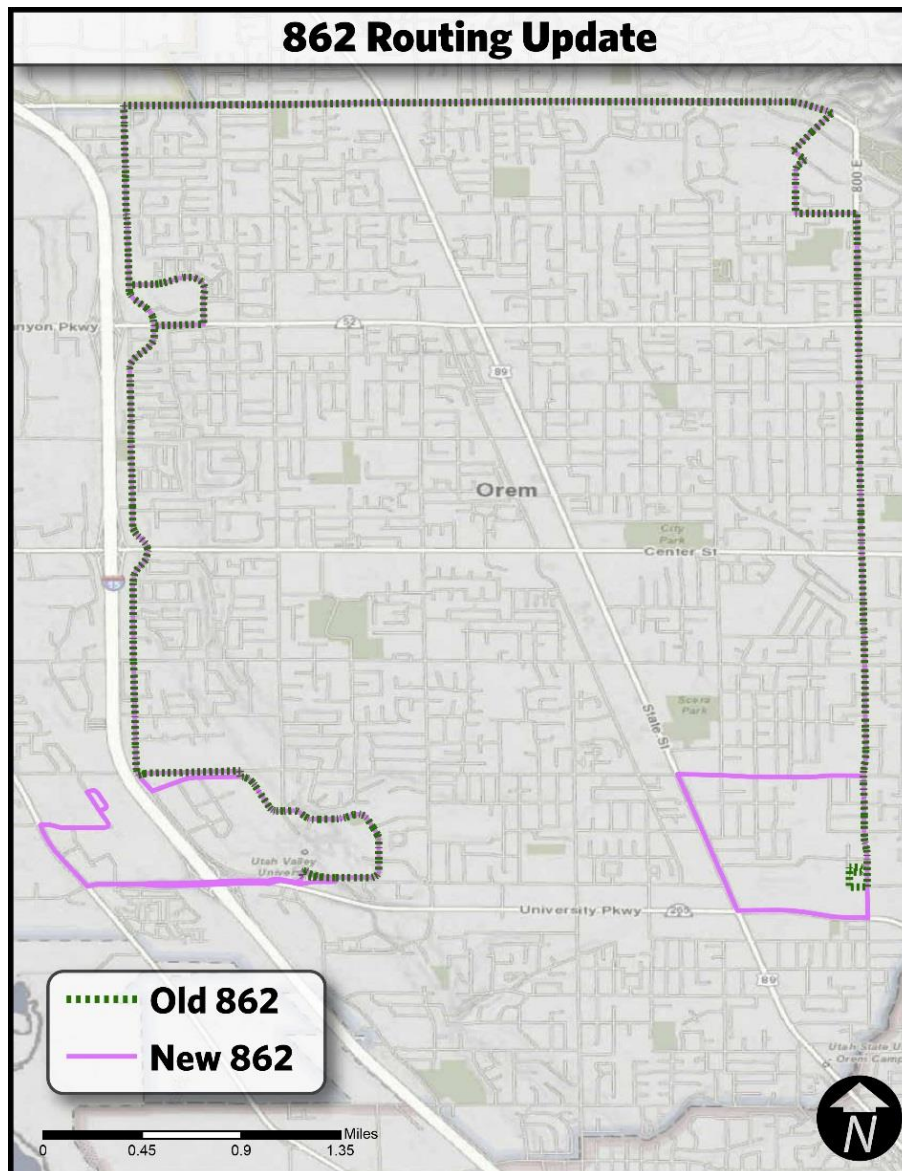


Route 821 – Realignment

It is proposed to realign route 821 in the northern section of its route, specific to how it approaches the Provo Central Station where Frontrunner and the Provo-Orem BRT have stations. The route will remain on State Street until it can approach the Provo Central Station from the north where riders can connect with the Provo-Orem BRT and reach destinations previously directly reached by the 821 such as the East Bay Technology Park.

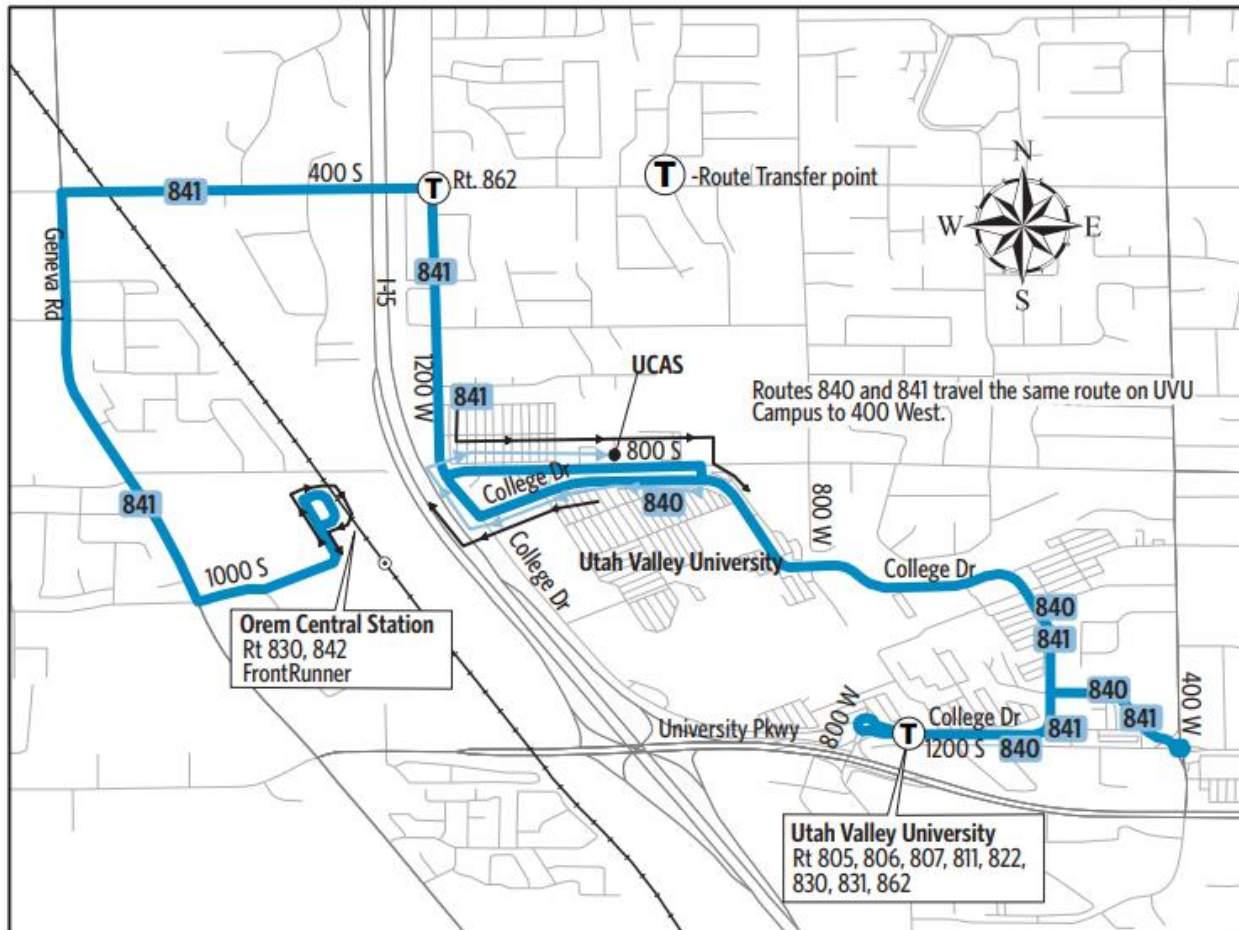
Route 862 – Addition to Route

On the northern end of the proposed Provo-Orem BRT route, there are some proposed changes to the route 862 which would add service to the Orem FrontRunner station. These stops are included as a mitigating factor as they provide some connectivity that may have been lost to those in the area who were accustomed to accessing the 830 on one of the stops on Geneva Road. Additionally, there is some rerouting, as shown in the image below, on the east side of the route that will eliminate the Mount Timpanogos Transit Center from the route then connect the 862 to the BRT station on University Parkway then go around the block.



Route 840 – Elimination

Route 840 follows nearly the same routing as the 841 but only runs around the UVU campus. It is proposed to eliminate service to this route due to low utilization and reallocate the resources to and increase capacity on the 841 by providing up to three buses at stops during high demand periods.



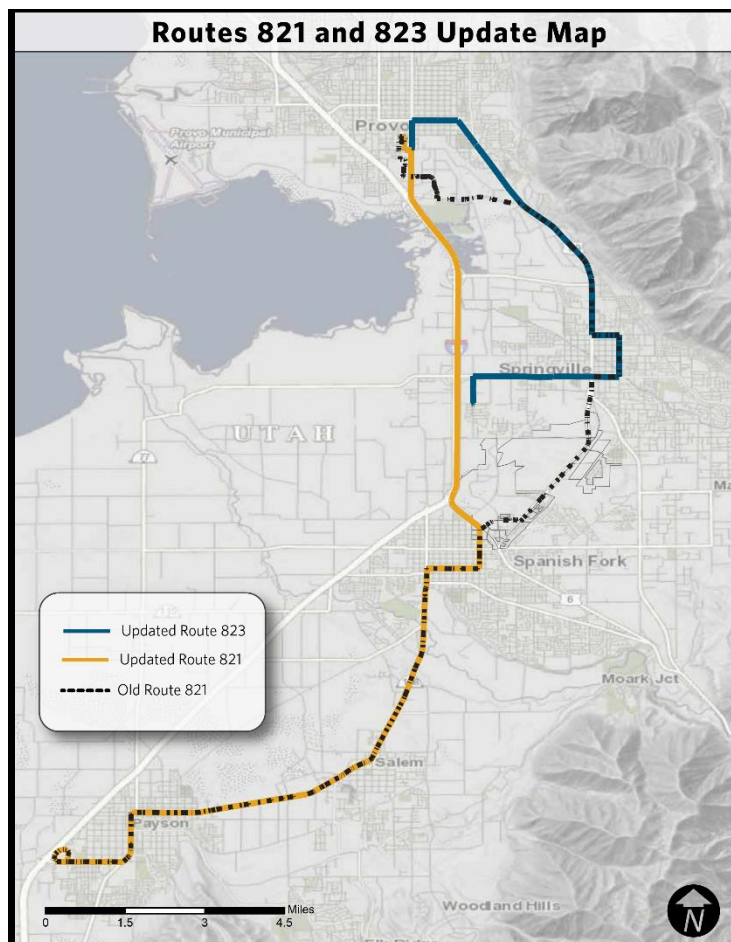
The ridership of the 840 averages 88 boardings per day during spring semester at UVU and 117 times during the fall. In comparison, the 841 has 1,142 average boardings per day in the spring and 1,403 in the fall. The difference shows that there is higher ridership demand from the Orem Central Station going to the UVU campus than going around the campus itself. There will be a reduction in the number times a bus will stop at each stop as combined 841 and 840 headways will be reduced, but the highest demand is for capacity when a FrontRunner train stops and riders are seeking to get to campus. The 841 headways would be 30 minutes.

Additional Proposed Changes

In addition to the changes listed above, the Timpanogos business unit has proposed additional improvements to service. These proposed service changes are in conjunction with the Provo-Orem BRT and therefore are added to this analysis per the FTA Circular 4702.1B's requirement that "all proposed changes to parallel or connecting service will be examined." These changes are pending budgetary approval and may not be put into service, but will be analyzed here in order to ensure both compliance with FTA requirements and that they are not inadvertently discriminatory to minority and/or low-income populations.

Route 821 – Split into two routes

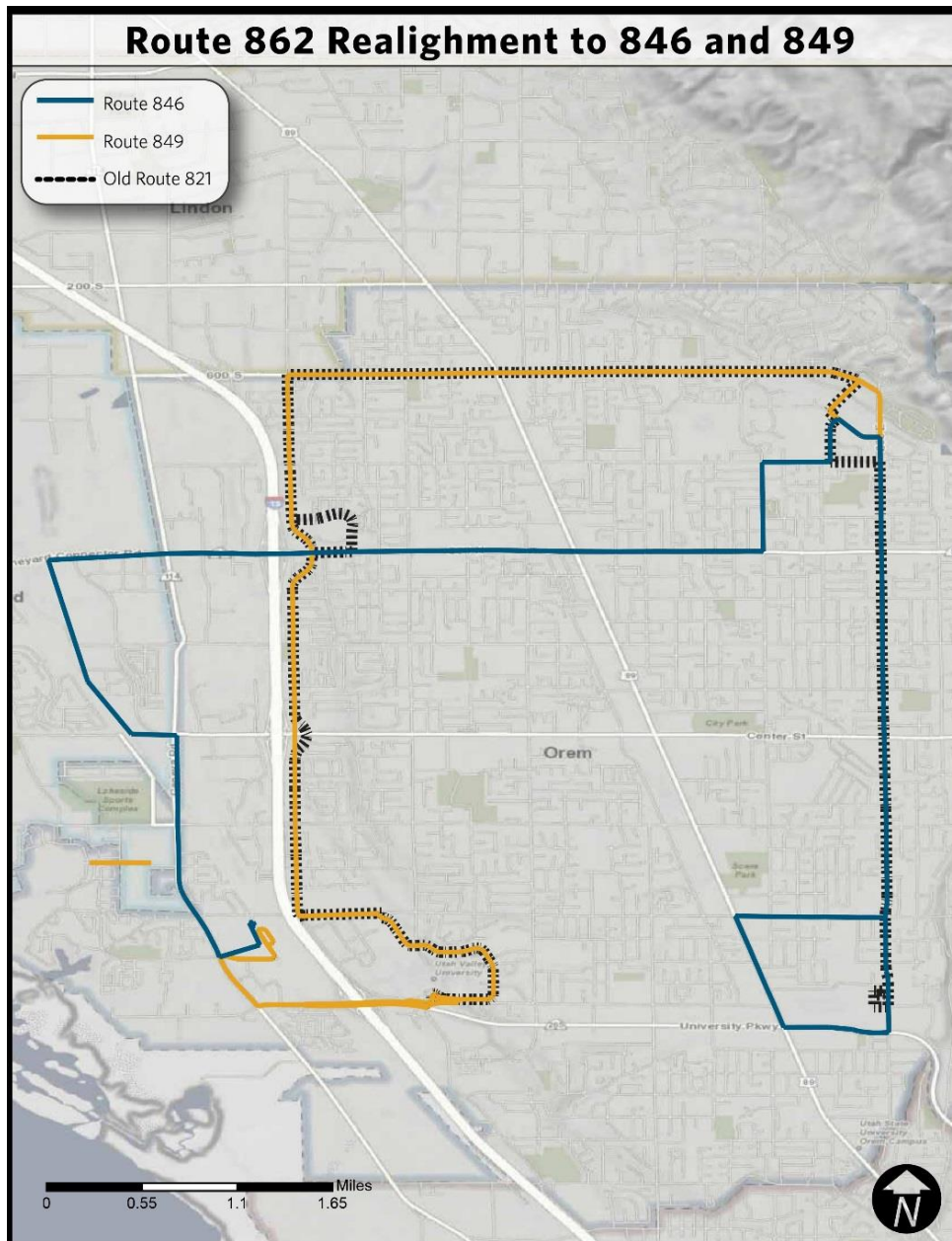
As shown in the image to the right, it is proposed to take the existing 821, shown as a dotted line, and turn it into two routes. At present, this route takes people North and South between Provo Central Station the cities of Spanish Fork, Salem and Payson. In an effort to expedite the time spent in transit, it is proposed to divert what would be the new 821 after passing through Spanish Fork on to the freeway directly and up to the Provo Central Station. The proposed new route 823 would serve more of Springville and take the new northern routing previously explained for the 821. The stops being eliminated between Springville and Spanish Fork are, by in large, unused. The most used stop averages eleven boardings



per day, but is 1,085 feet from a stop that will be kept. Of the remaining eight stops, four of them average zero boardings per day, two average three boardings and the remaining two stops average 1 and 2 boardings per day respectively. The proposal would increase headways to 30 minutes during peak times on the weekdays and 60 minute peak headways on Saturday.

Route 862 – Split into two routes

It is proposed to take the existing 862 route with the proposed alignment changes previously explained and create two new routes. The proposed route 846 will follow the eastern edge of the existing 862 and will take a western course that will provide additional service to Orem and Vineyard as it continues past the freeway and provides new service on the west of the Freeway. The proposed route 849 will continue on the alignment of the 862 and carries it all the way down through Orem, UVU and ends at the Provo Central Station. Both the 846 and 849 will have 30 minute peak headways on the weekdays and 60 minute peak headways on Saturday.



Analysis of Proposed Changes

UTA is required to analyze the potential impacts of any major service change as it relates to Low-income populations and minority populations. Pursuant to this requirement, UTA has created the following maps, tables and related data. The data in this section was compiled utilizing American Community Survey (ACS) 2011-2015 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups. This was done in order to use the smallest geographic area possible for the analysis. The distribution was dictated by population ratios from 2010 Census Data. Analysis was done based on the stops of the route. All stops have had a one quarter mile radius applied to them based on the actual accessibility of the route by road. Any census block that is overlapped by this “walkability radius” has its population included as those effected by the proposed changes. These aggregated numbers are compiled as a comparison group to the service area’s average to determine disparate impact and disproportionate burden.

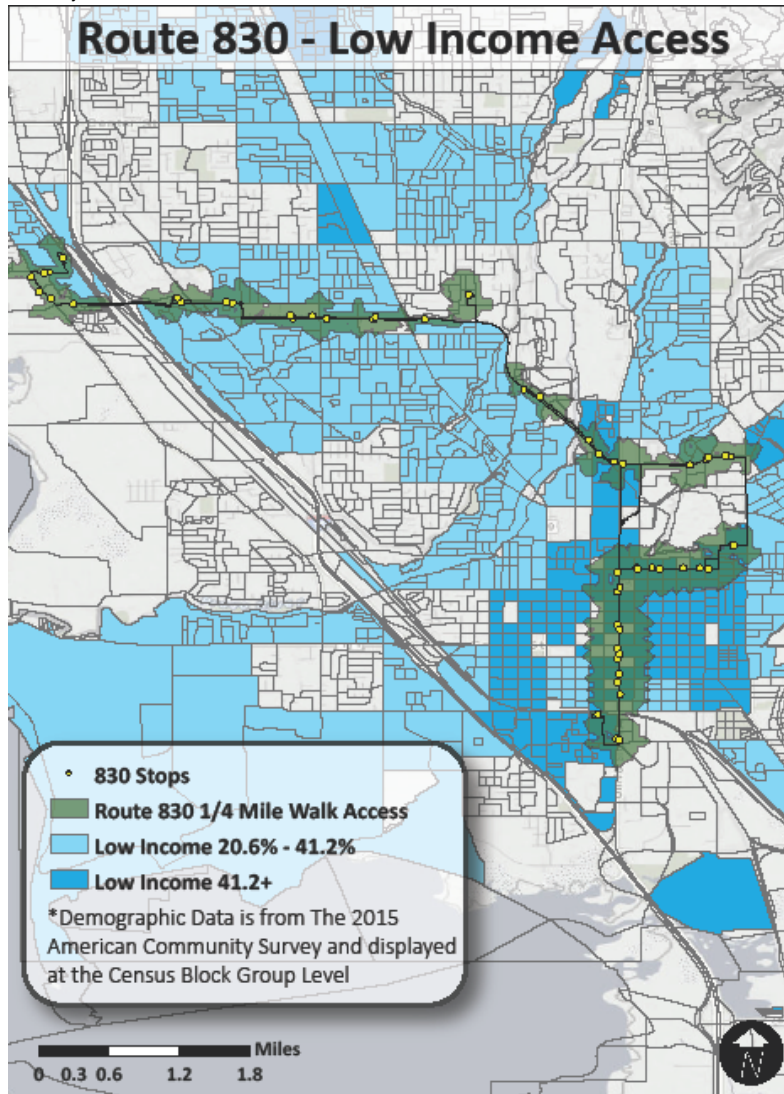
When analyzing a bus stop, UTA uses a one quarter mile walk radius from the stop. However, since the transit behaviors of a BRT more closely resemble a light rail platform than a traditional bus stop, UTA conducted further research and consultation with the Federal Transit Administration (FTA) to determine if the half mile metric was applicable to bus rapid transit. We considered many factors in regards to the decision of what is a reasonable distance someone would walk to ride the Provo-Orem BRT. The place of boarding is in a dedicated station where the amenities are comparable to a light rail station. The proposed headways, at 6 minutes, are less than half of that of the rail system in Salt Lake City. The transit vehicles are large, articulating and have five doors that resemble level boarding. In light of these differences, UTA has determined that a half mile walk radius is the appropriate measure for this mode of transportation, which is the standard practice in many studies and corroborated by the FTA.

Please note that any disparity in population size between Low Income and Minority Populations is due to the way in which American Community Survey counts low income populations. “Group quarters”, a type of housing, is eliminated from low income ACS data, resulting in the reduced population for that demographic. Group quarters includes residential treatment centers, group homes, military barracks, correctional facilities and college residence halls.

The maps in this section will show the route, individual stops with a walkability radius, and census blocks with concentrations of low-income individuals or minority individuals above the system average, which are shaded according to density.

Route 830

Low-Income Analysis



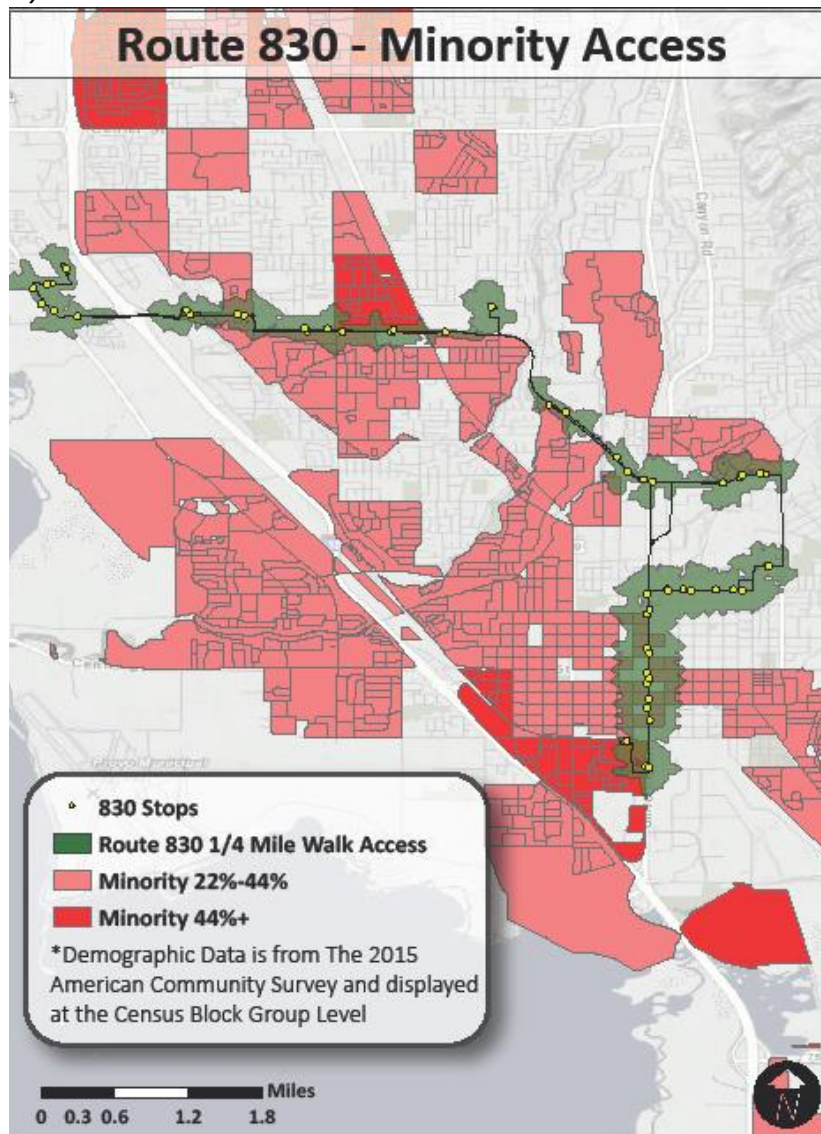
The total impacted population compared to the system average are shown below in tabular format below.

Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 821 – Increased Access	
Total Population:	29,571
Low-income Population:	7,171
Percent low-income:	24.3% (3.9%)

As expressed in the table above, the total low-income population impacted by this elimination is 3.9% greater than the system average.

Minority Analysis



The total impacted population compared to the system average are shown below in tabular format below.

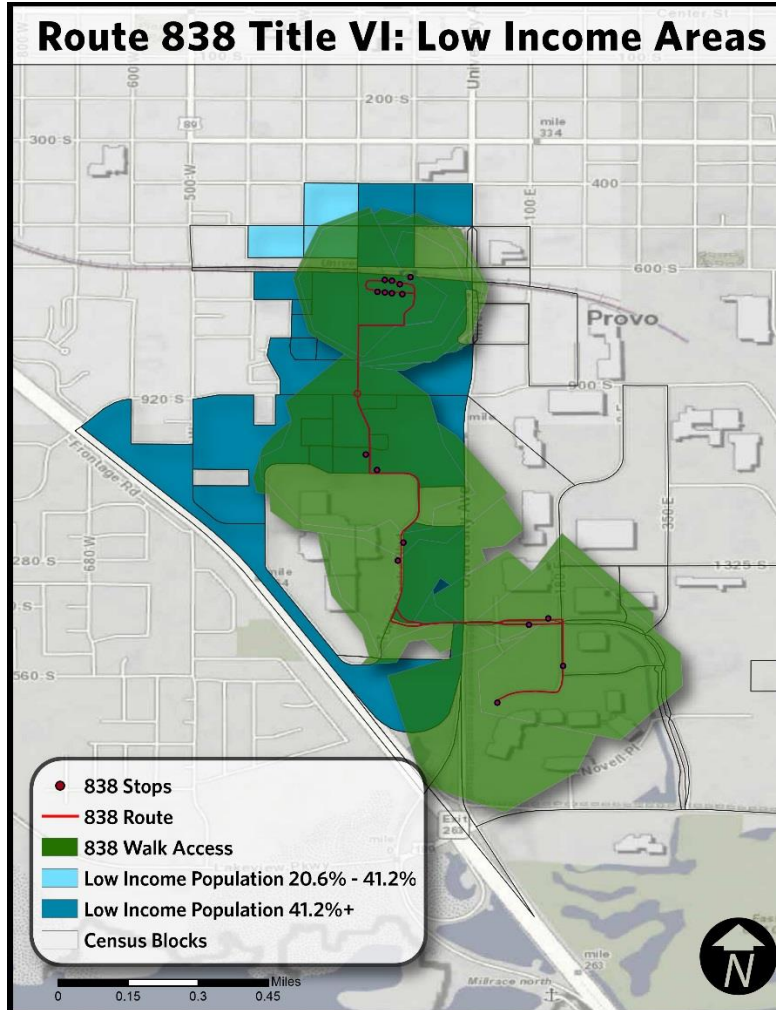
Minority System Average	
Total Population:	2,277,445
Low-income Population:	499,870
Percent low-income:	21.9%

Route 821 & 823 – Increased Access	
Total Population:	36,159
Low-income Population:	6,858
Percent low-income:	19% (-2.9%)

As expressed in the table above, the low-income population impacted by this elimination is 2.9% below the system average.

Route 838

Low-Income Analysis



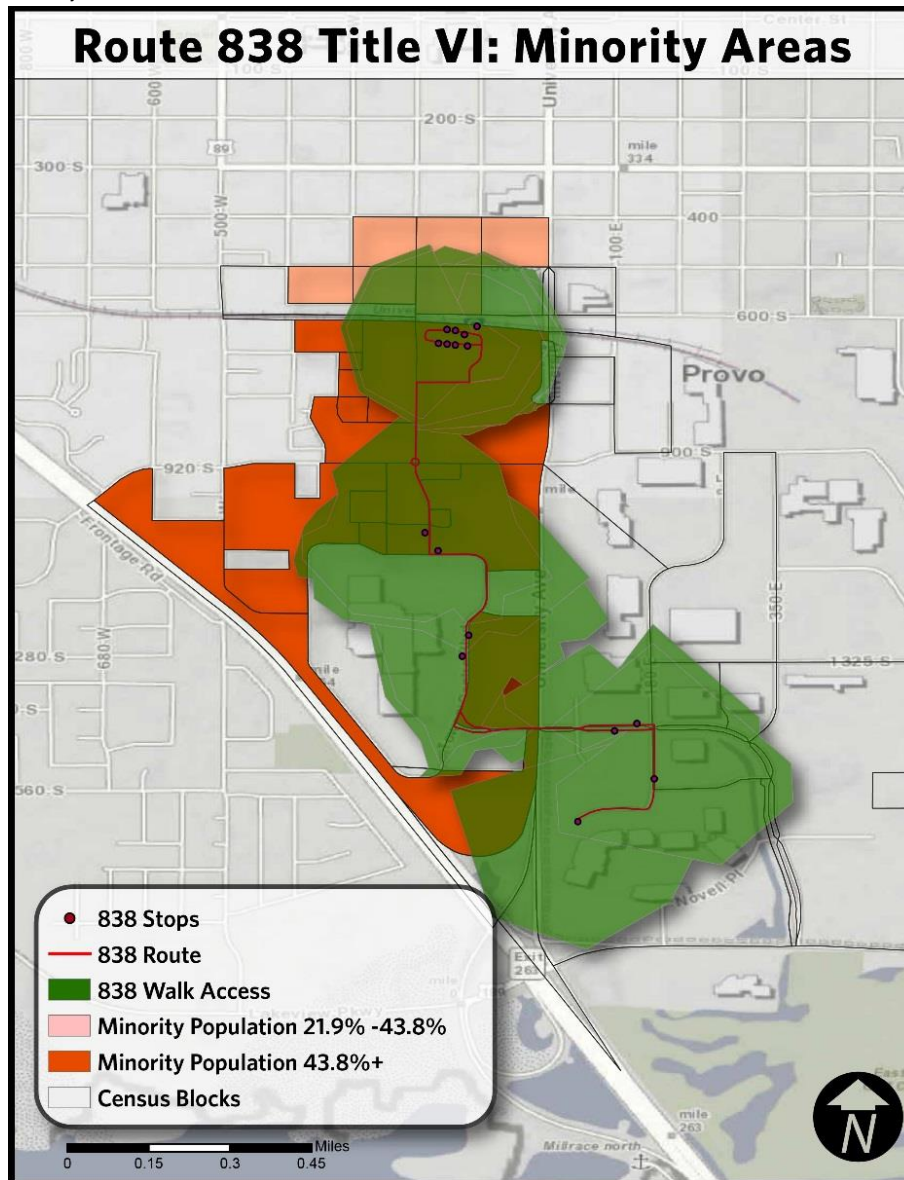
The total impacted population compared to the system average are shown below in tabular format below.

Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 821 – Increased Access	
Total Population:	1,546
Low-income Population:	785
Percent low-income:	50.8% (30.4%)

As expressed in the table above, the total low-income population impacted by this elimination is 30.4% greater than the system average.

Minority Analysis



The total impacted population compared to the system average are shown below in tabular format below.

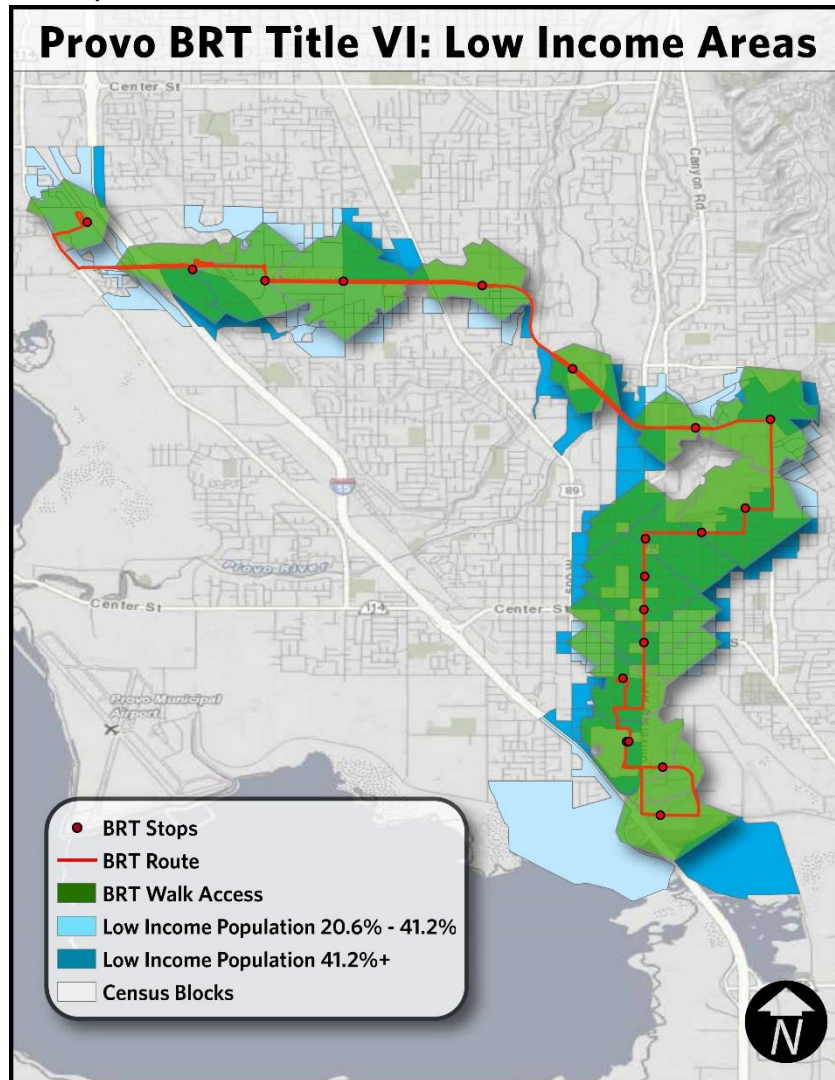
Minority System Average	
Total Population:	2,277,445
Low-income Population:	499,870
Percent low-income:	21.9%

Route 821 & 823 – Increased Access	
Total Population:	1,519
Low-income Population:	928
Percent low-income:	58.3% (36.4%)

As expressed in the table above, the low-income population impacted by this elimination is 36.4% above the system average.

Proposed BRT

Low-Income Analysis



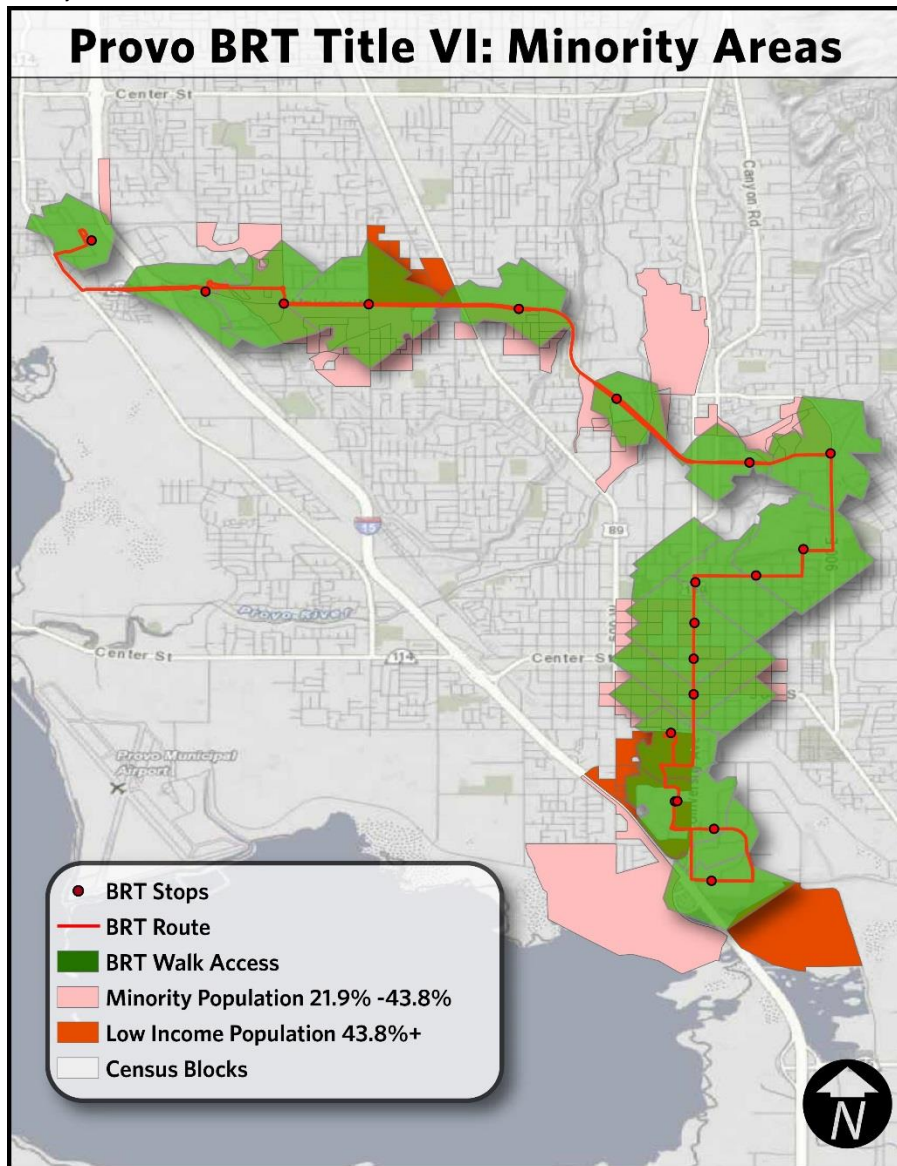
The total impacted population compared to the system average are shown below in tabular format below.

Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 821 – Increased Access	
Total Population:	45,479
Low-income Population:	24,647
Percent low-income:	53.9% (33.5%)

As expressed in the table above, the total low-income population impacted by this addition 33.5% greater than the system average.

Minority Analysis



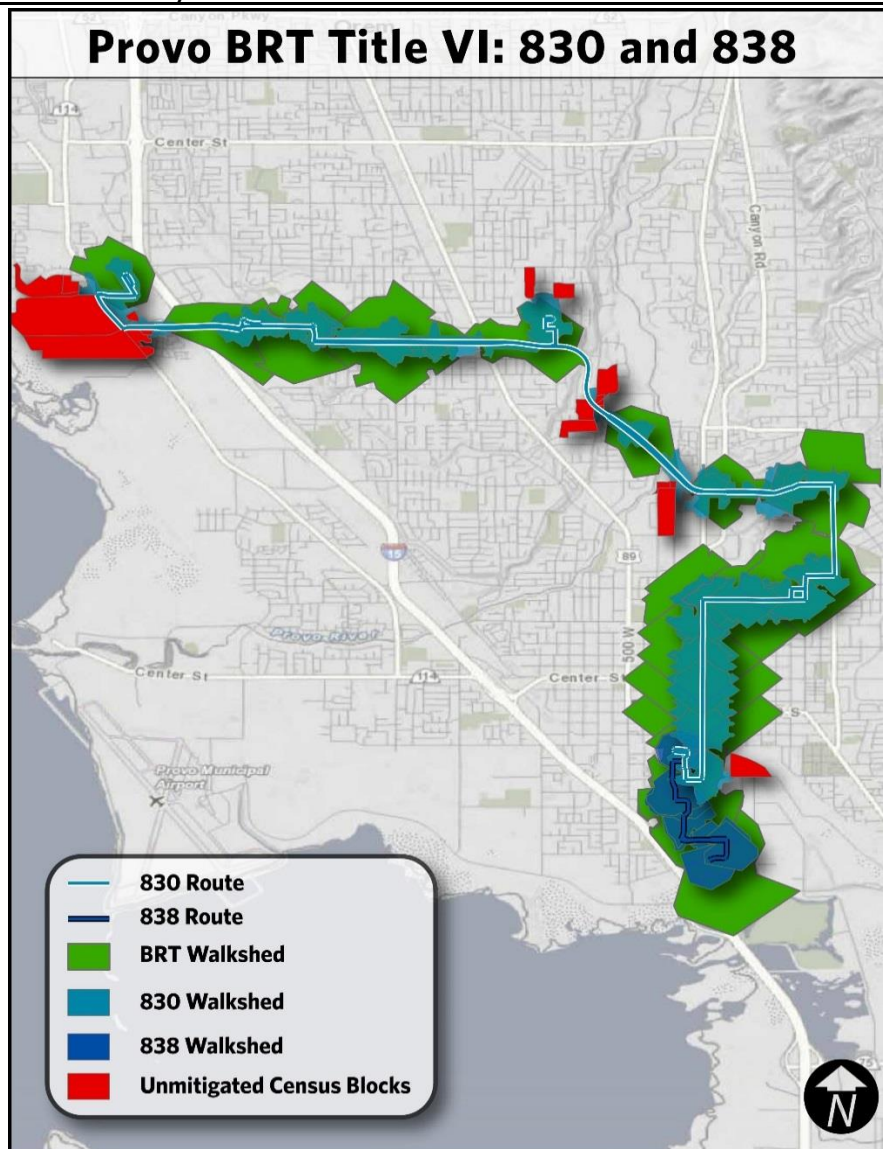
The total effected population compared to the system average are shown below in tabular format below.

Minority System Average	
Total Population:	2,277,445
Low-income Population:	499,870
Percent low-income:	21.9%

Route 821 & 823 – Increased Access	
Total Population:	53,882
Low-income Population:	11,816
Percent low-income:	21.9%

As expressed in the table above, the minority population impacted by this addition is at the system average.

Comparative Analysis of Route 830 & 838 to Provo-Orem BRT



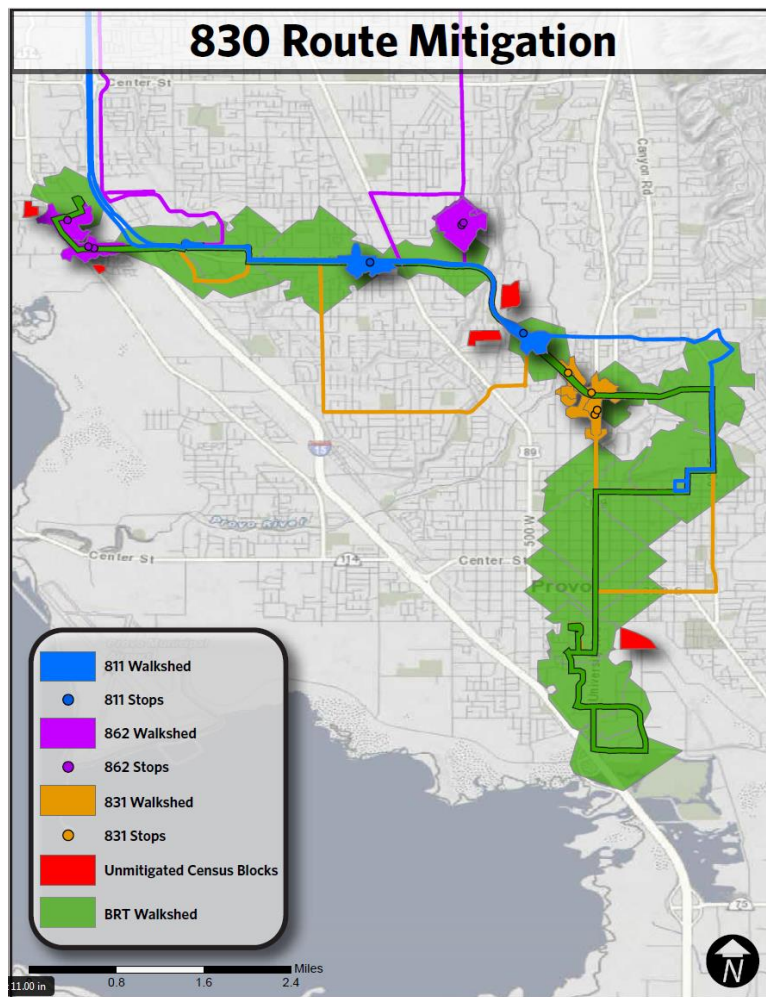
<i>Low-Income Population:</i>	
Population:	1,470
Low-Income Population:	365
Percent Low-income:	24.8% (+4.4%)

<i>Minority Population:</i>	
Population:	1,599
Minority Population:	279
Percent Minority:	17.4% (-4.5%)

As expressed in the table above, the number of people excluded from the impacted populations is numerically a small (less than 3% of the BRT's service area). Low-income people negatively impacted by this replacement are 4.5% more than the system average while the minority population is 4.5% less than the system average. It also completely mitigates route 838.

Route 830 & 838 Removal – Mitigating Stops

Low-Income and Minority Analysis with mitigation from routes 831, 811 and an extended 862



The total effected population by the proposed elimination of Route 830 and not covered by the Proposed BRT or mitigating stops are shown below in tabular format below.

<i>Low-Income Population:</i>	
Population:	406
Low-Income Population:	105
Percent Low-income:	25.9% (+5.5%)

<i>Minority Population:</i>	
Population:	441
Minority Population:	77
Percent Minority:	17.5% (-4.4%)

As expressed in the table above, the total low-income population negatively impacted by this elimination and with the addition of mitigating stops and an increased BRT access is 5.5% greater than the system average. The minority population is 4.4% less than the system average. The total population not covered represents 28% of the non-mitigated areas and .8% of the BRT’s service area.

Fares Consideration

The FTA Circular 4702.1B states that transit providers “shall analyze any available information generated from ridership surveys” when choosing datasets for fare changes. In the 2015 and 2016, UTA conducted an On-Board Survey of over 16,000 people where demographics were collected and compiled based on several factors, route being one of them. Route 830 had 210 respondents and will be the dataset used in examining the possibility of a sponsored fare. 27 of the respondents selected, “prefer not to answer” on the income question. That difference is shown in the tables below. The sponsored fare that may be contributed by Mountainland Association of Government is designed to cover the portion of the operation budget that is anticipated to be covered by fare collection revenue and would cover the rider’s fare. The individual rider would not be expected to pay a fare.

Average from all Surveyed

<i>Low-Income Pop. (Under 10k annual):</i>	
Population:	13,306
Low-Income Population:	1,601
Percent Low-income:	12%

<i>Low-Income Pop. (Under 20k annual):</i>	
Population:	13,306
Low-Income Population:	3,531
Percent Low-income:	26.5%

<i>Low-Income Pop. (Under 30k annual):</i>	
Population:	13,306
Low-Income Population:	5,915
Percent Low-income:	44.5%

Minority Population:	
Population:	16,408
Low-Income Population:	4,081
Percent Low-income:	24.9%

Average from all surveyed on 830

<i>Low-Income Pop. (Under 10k annual):</i>	
Population:	183
Low-Income Population:	38
Percent Low-income:	20.8% (+8.8%)

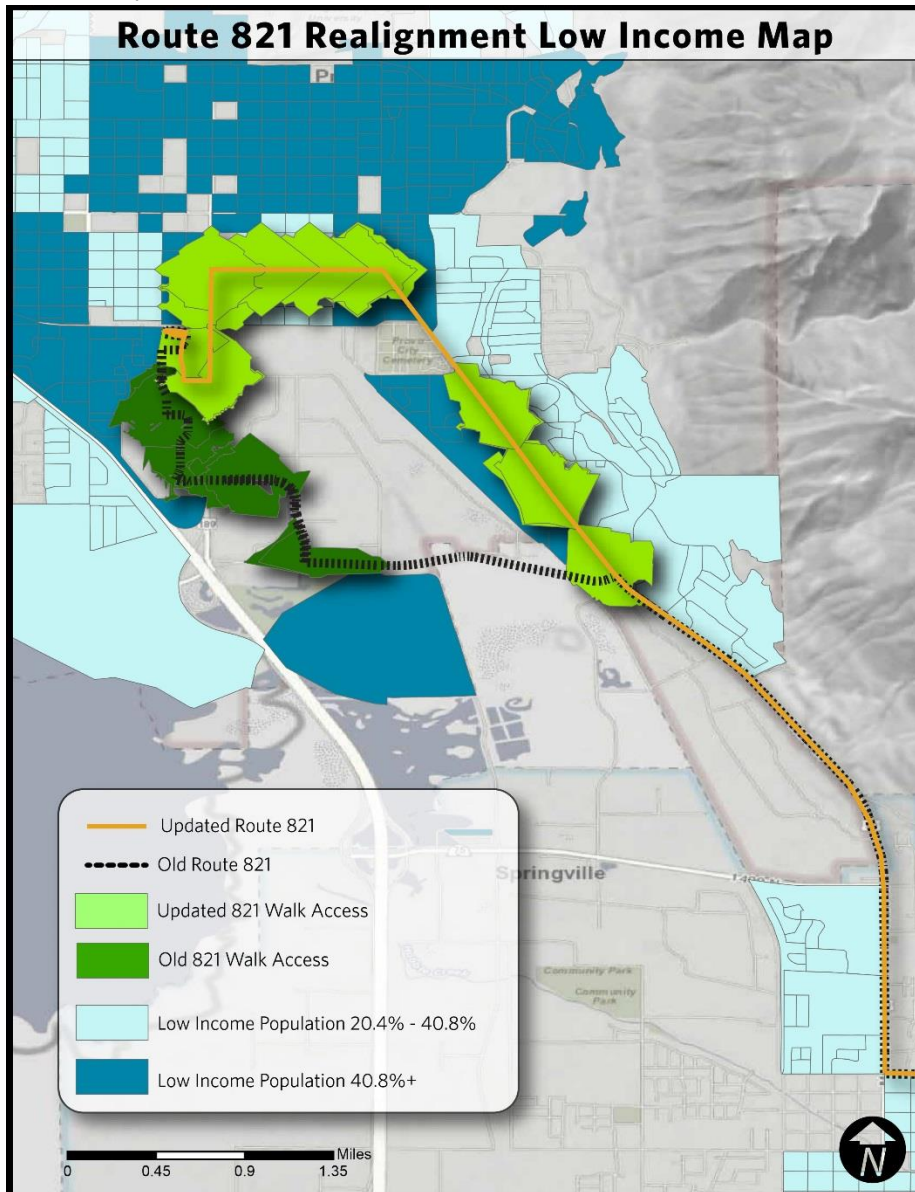
<i>Low-Income Pop. (Under 20k annual):</i>	
Population:	183
Low-Income Population:	78
Percent Low-income:	42.6% (+16.1%)

<i>Low-Income Pop. (Under 30k annual):</i>	
Population:	183
Low-Income Population:	114
Percent Low-income:	62.3% (+17.8%)

Minority Population:	
Population:	210
Minority Population:	61
Percent Minority:	29% (+4.1%)

Route 821 – Realignment

Low-Income Analysis

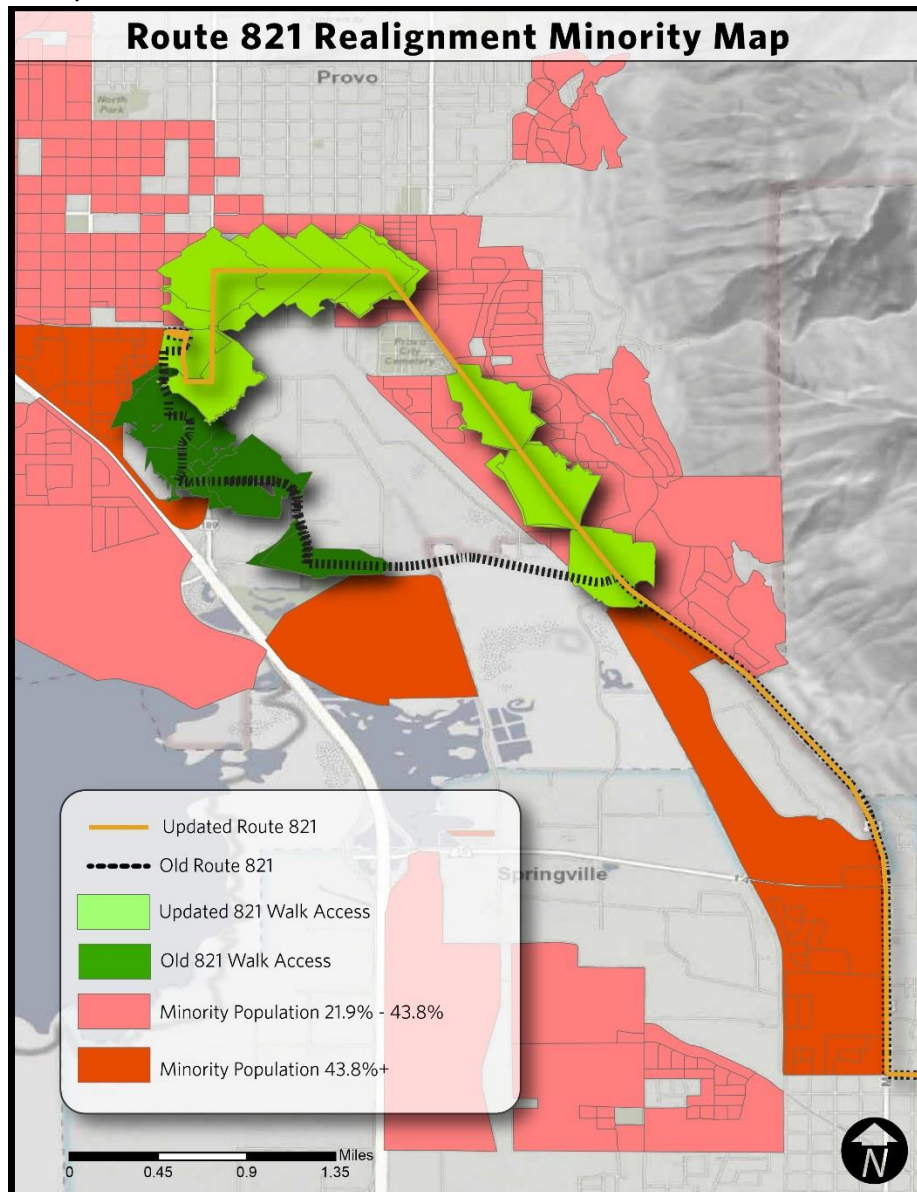


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 821 – Increased Access	
Total Population:	8,813
Low-income Population:	3,727
Percent low-income:	42.3% (21.9%)

As expressed in the table and figure above, the low-income populations impacted by this addition is 21.9% above the system average.

Minority Analysis

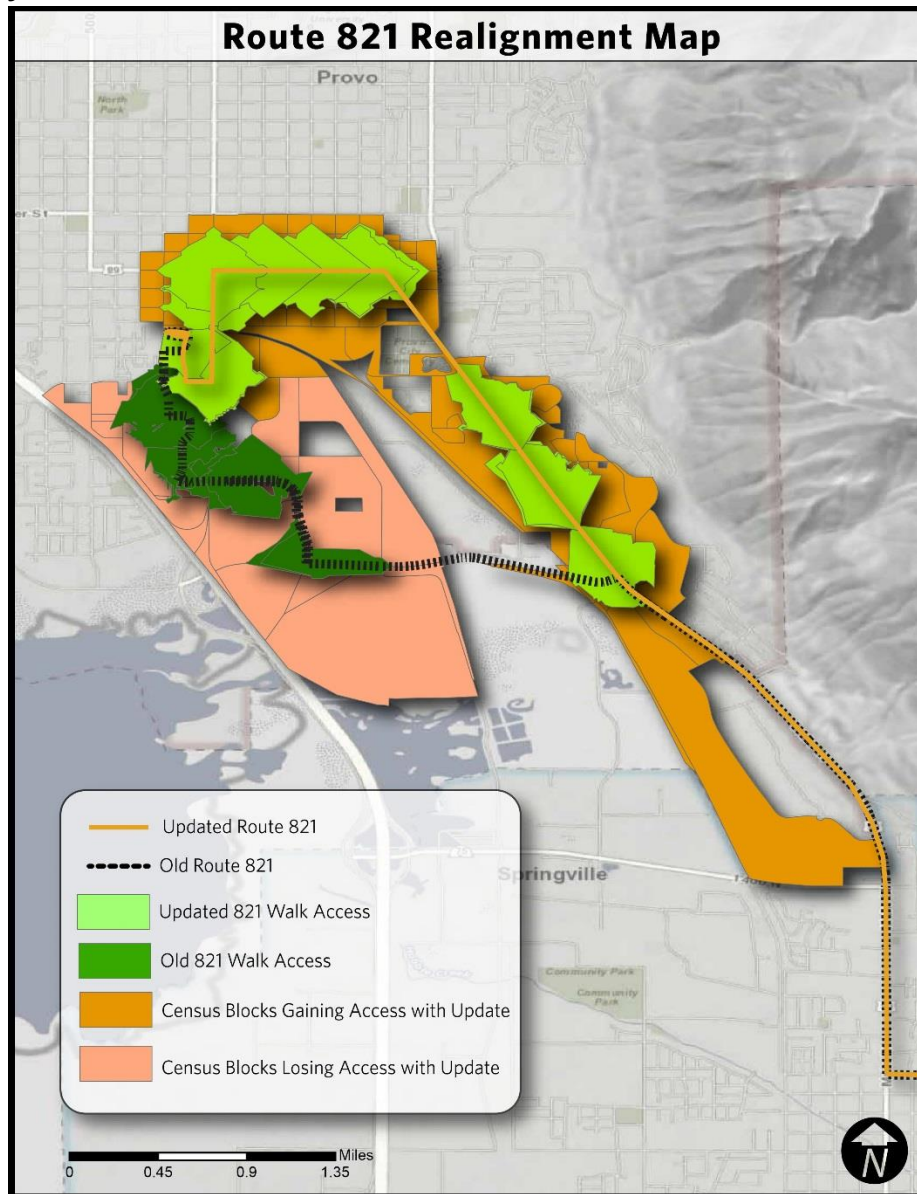


Minority System Average	
Total Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Route 821 – Increased access	
Total Population:	8,888
Minority Population:	2,875
Percent Minority:	32.4% (10.5%)

As expressed in the table and figure above, the minority populations impacted by this addition is 10.5% above the system average.

Analysis of Lost Access



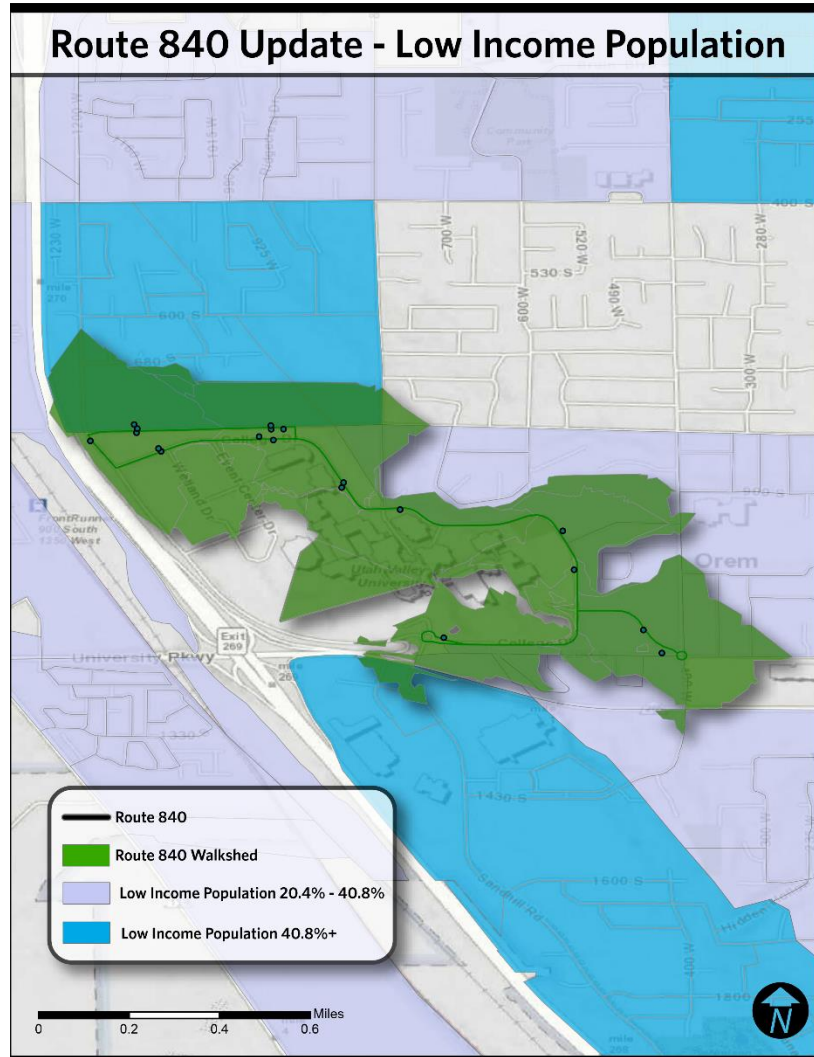
Minority Population Losing Access	
Total Population:	680
Minority Population:	437
Percent Minority:	64.3% (42.4%)

Low-income Population Losing Access	
Total Population:	670
Minority Population:	356
Percent Minority:	53.9% (33.5%)

As stops have been eliminated, the map above shows those who have both gained and lost access, with the table specifically focusing on those *losing access* to previous stops. The minority populations impacted by this addition is 7% above the system average and low-income is 24% above the system average.

Route 840

Low-Income Analysis

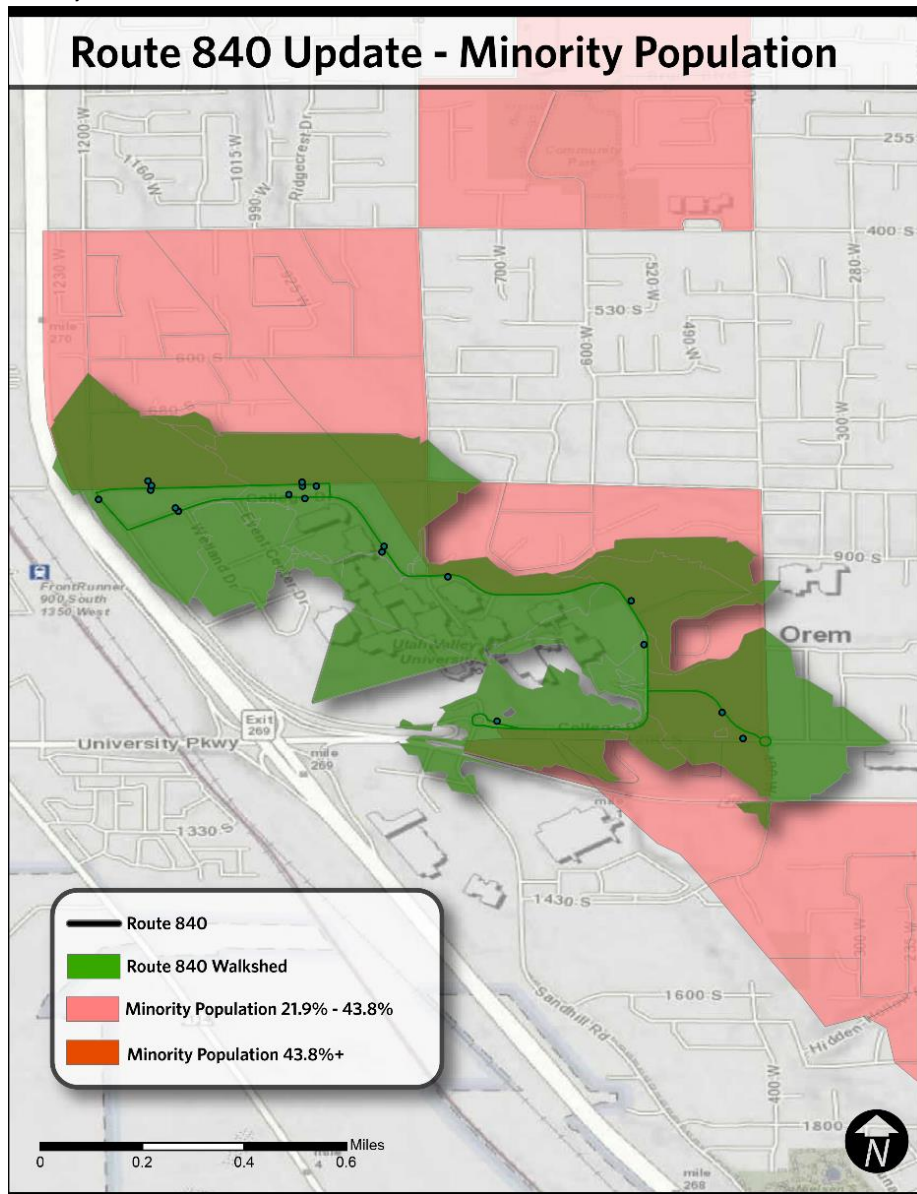


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 821 – Increased Access	
Total Population:	3,629
Low-income Population:	1,327
Percent low-income:	36.6% (16.2%)

As expressed in the table and figure above, the low-income populations impacted by this addition is 16.2% above the system average.

Minority Analysis



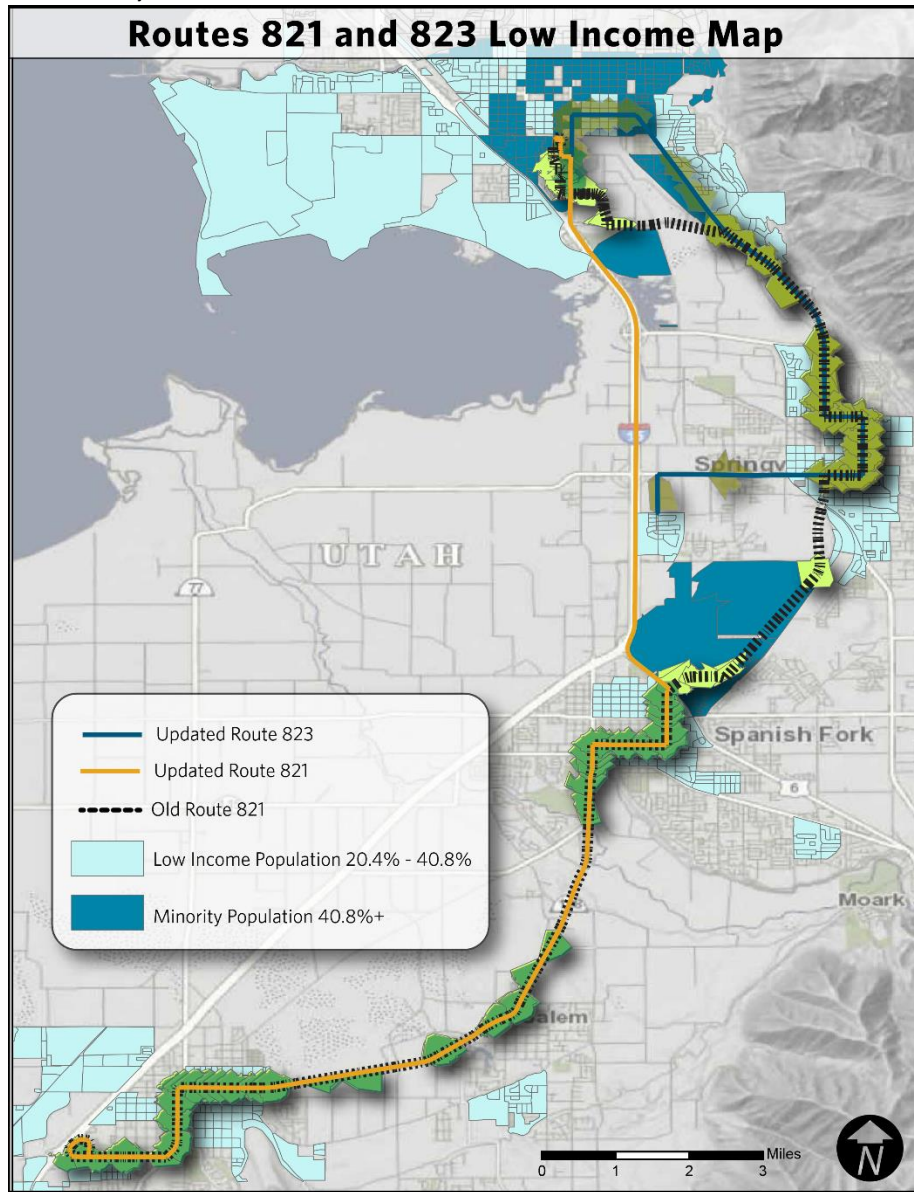
Minority System Average	
Total Population:	2,277,445
Low-income Population:	499,870
Percent low-income:	21.9%

Route 821 & 823 – Increased Access	
Total Population:	3,683
Low-income Population:	916
Percent low-income:	24.9% (3%)

As expressed in the table and figure above, the minority populations impacted by this addition is 3% above the system average.

Route 821 – Split into 821 & 823

Low-Income Analysis

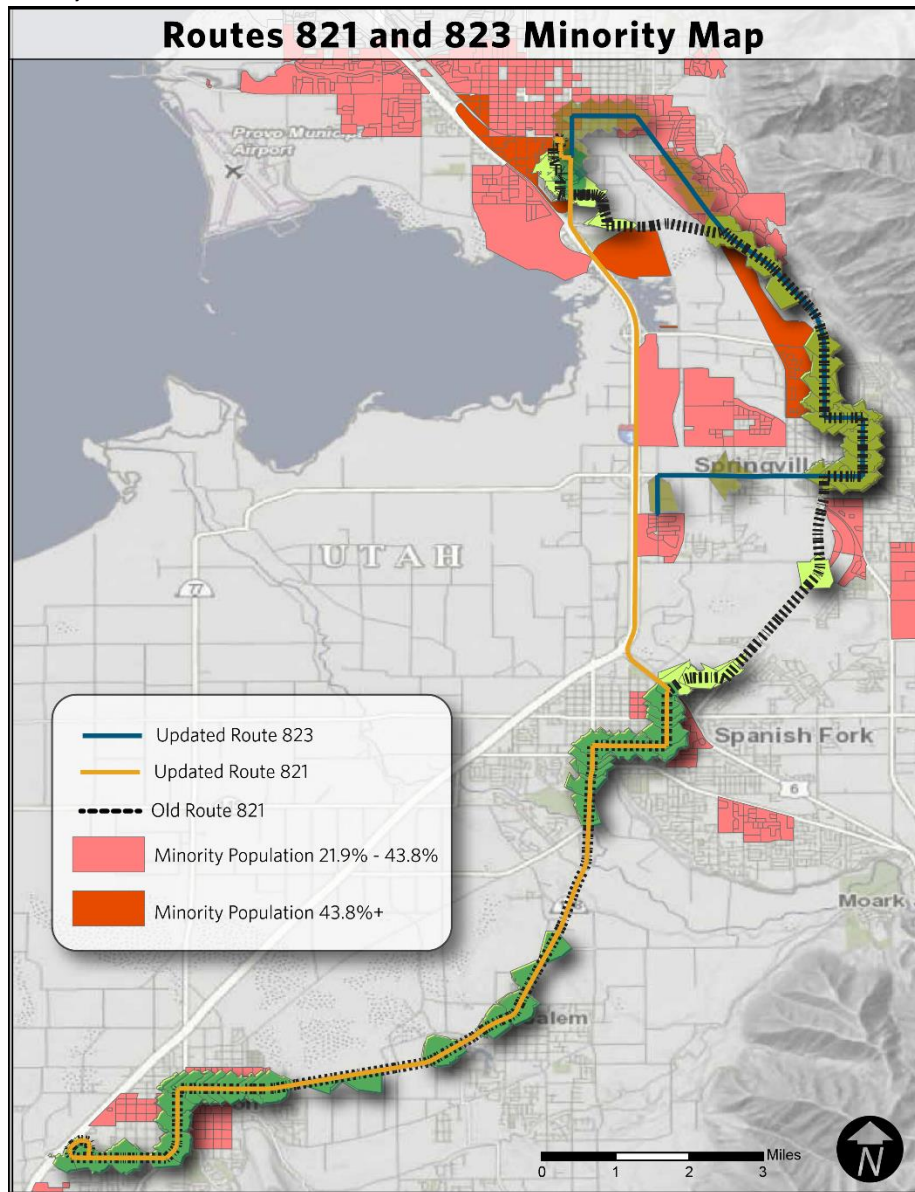


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 864 – Increased Access	
Total Population:	9258
Low-income Population:	3,776
Percent low-income:	40.8% (20.4%)

The table and figure above show the stops and distribution of low-income populations that are *gaining access* as a result of the proposed changes. The low-income populations *benefitting from* this addition is 20.4% above the system average.

Minority Analysis

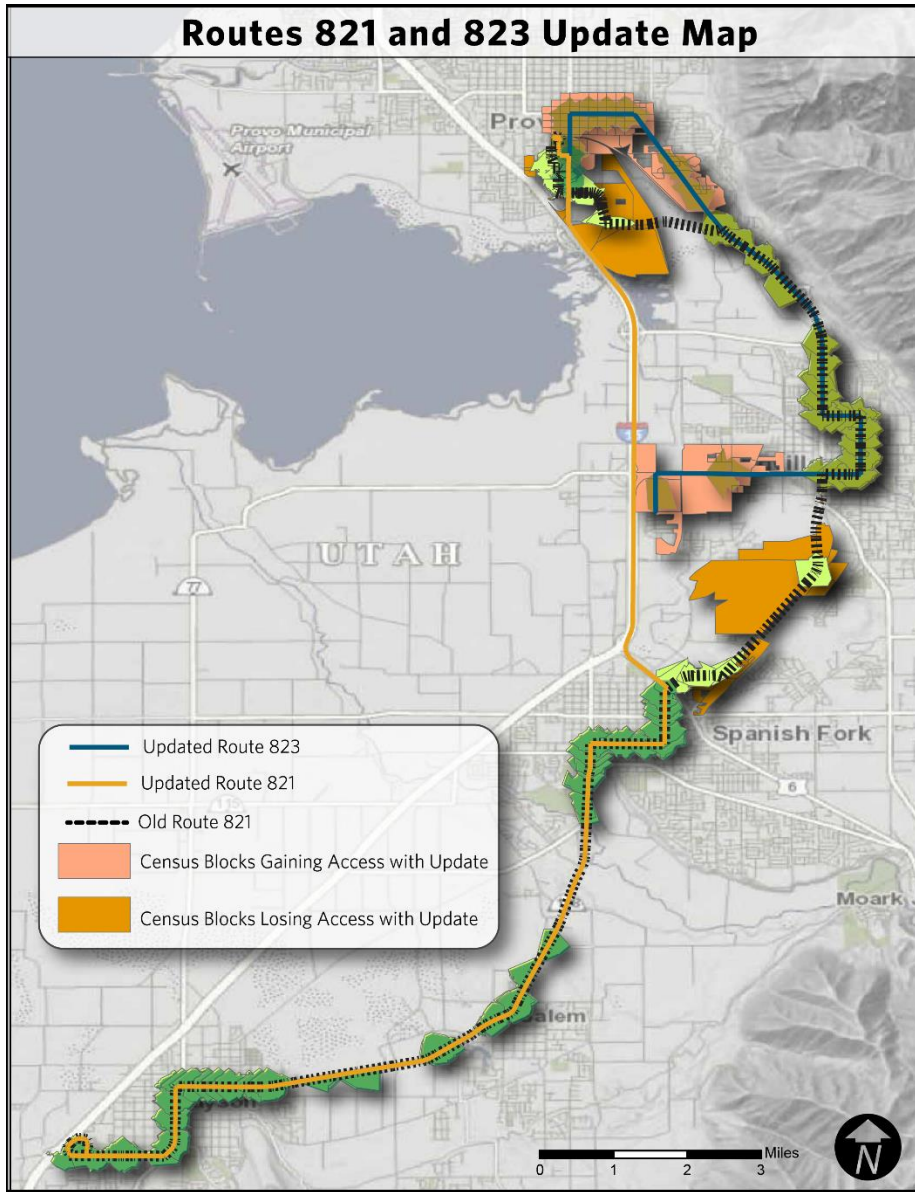


Minority System Average	
Total Population:	2,277,445
Low-income Population:	499,870
Percent low-income:	21.9%

Route 821 & 823 – Increased Access	
Total Population:	9,321
Low-income Population:	2,813
Percent low-income:	30.2% (8.3%)

The table and figure above show the stops and distribution of minority populations that are *gaining access* as a result of the proposed changes. The minority populations *benefiting from* this addition is 9.8% above the system average.

Analysis of Lost Access



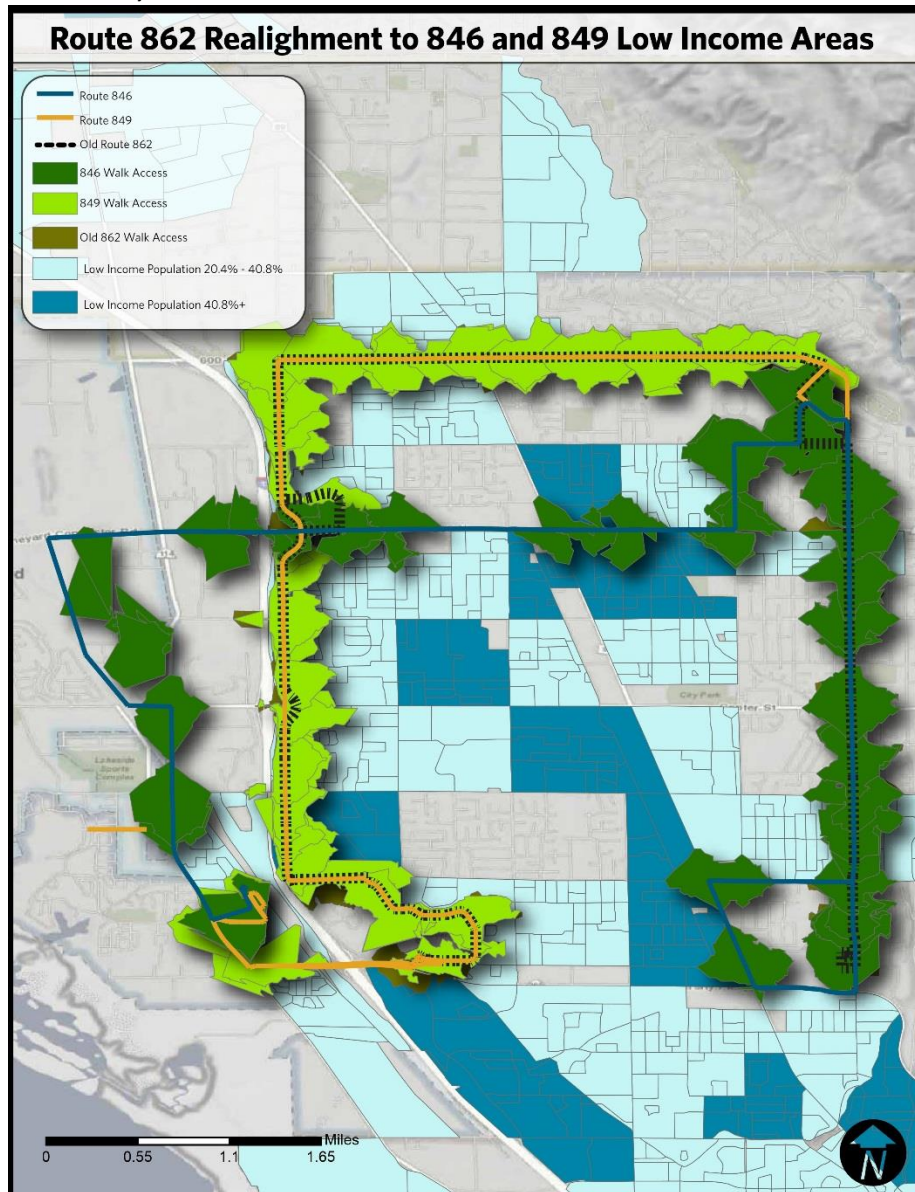
Minority Population Losing Access	
Total Population:	1,794
Minority Population:	519
Percent Minority:	28.9% (7%)

Low-income Population Losing Access	
Total Population:	1,740
Minority Population:	772
Percent Minority:	44.4% (24%)

As stops have been eliminated, the map above show those who have both gained and lost access, with the table specifically focusing on those *losing access* to previous stops. The minority populations impacted by this addition is 7% above the system average and low-income is 24% above the system average.

Route 862 – Split into 845 & 849

Low-Income Analysis

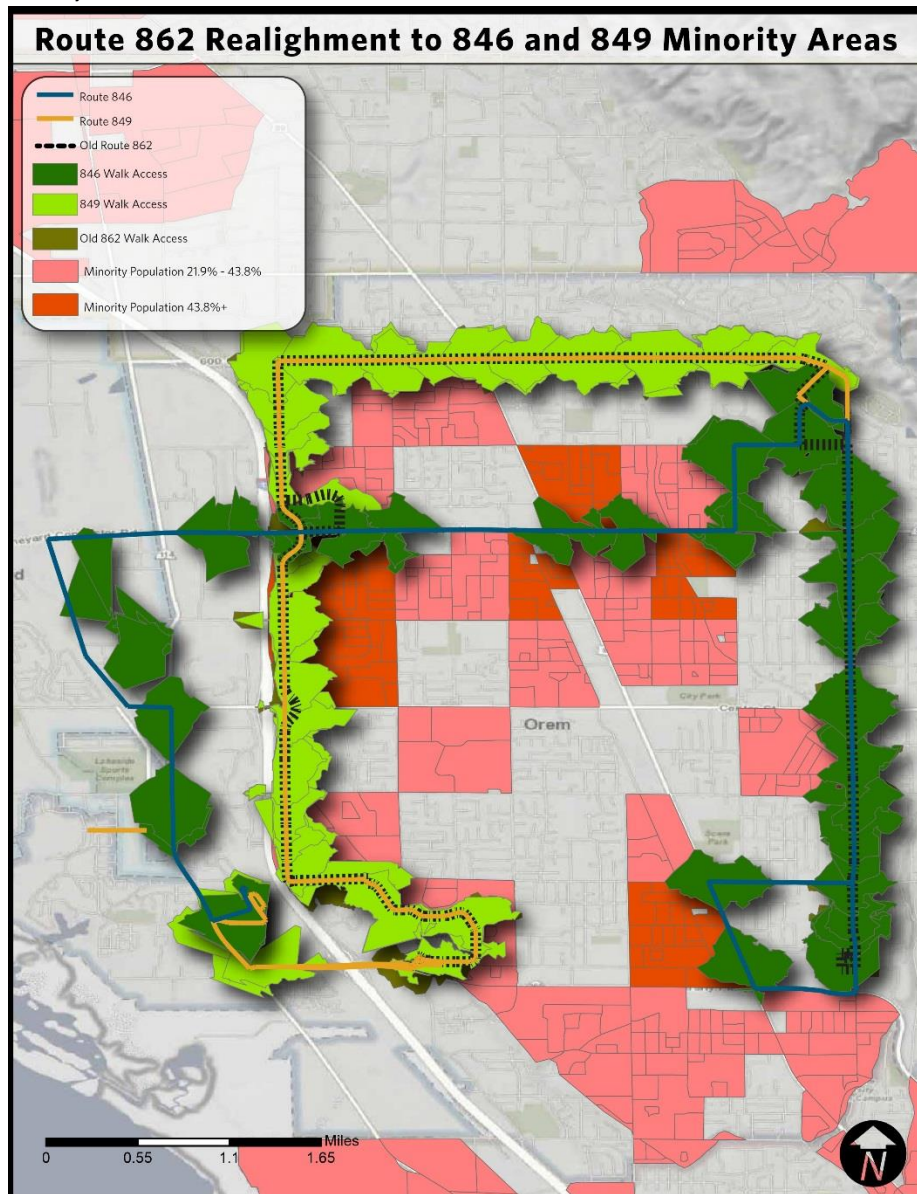


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 864 – Increased Access	
Total Population:	15,540
Low-income Population:	4,875
Percent low-income:	31.4% (10%)

The table and figure above show the stops and distribution of low-income populations that are *gaining access* as a result of the proposed changes. The low-income populations *benefitting from* this addition is 10% above the system average.

Minority Analysis

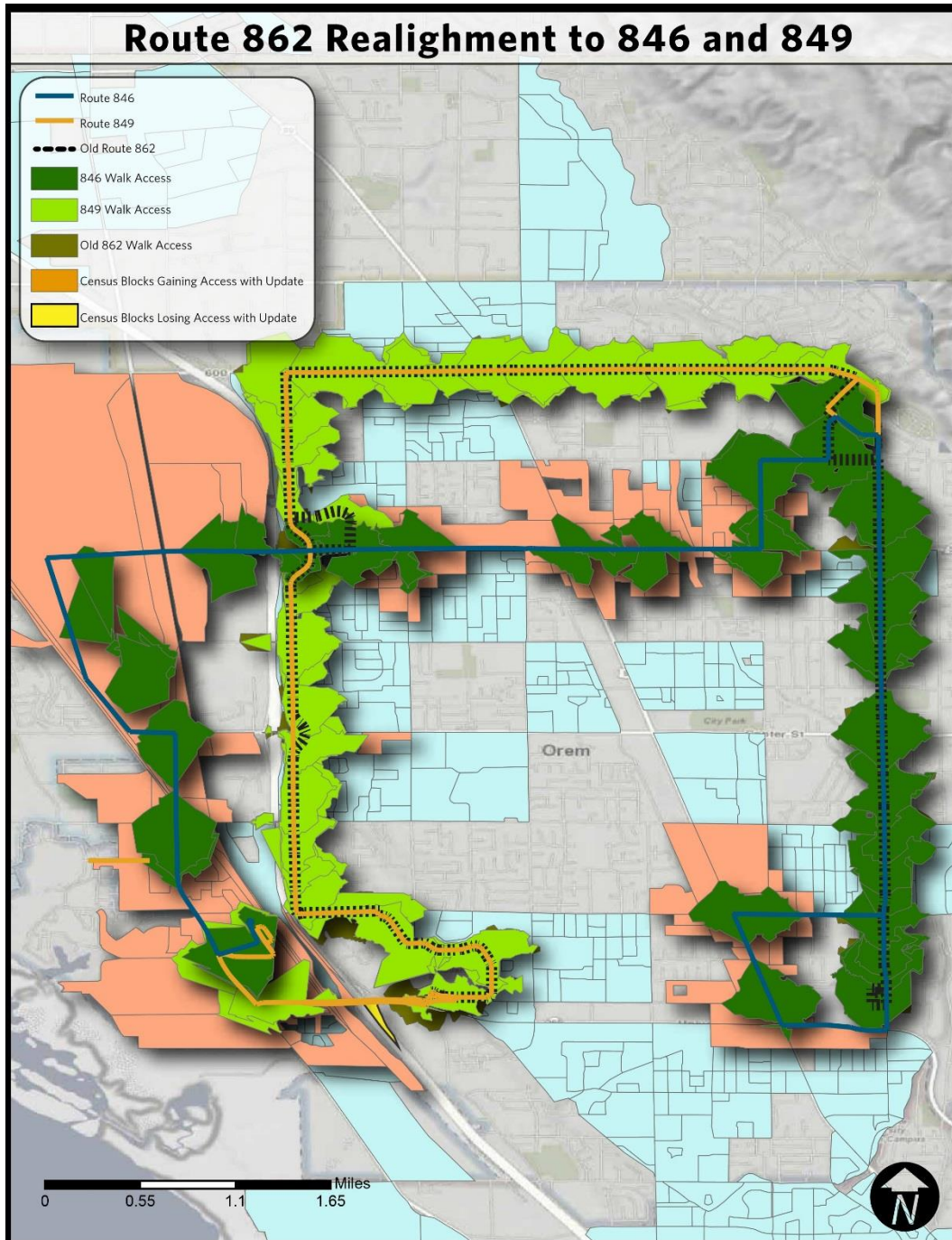


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Route 821 & 823 – Increased Access	
Total Population:	18,404
Low-income Population:	4,542
Percent low-income:	24.7% (4.3%)

The table and figure above show the stops and distribution of minority populations that are *gaining access* as a result of the proposed changes. The minority populations *benefiting from* this addition is 4.3 % above the system average.

Analysis of Lost Access



As the changes were analyzed, the map above shows those who have both gained and lost access. There is only one census block that does not have access to the route when it used to, but there is nobody living in the census block. As such, nobody would lose access due to this proposed change.

Findings of Analysis

Replacement of Route 830

There were no findings of a disparate impact or disproportionate burden in the removal of the 830. The BRT covers all of the routing of the 830 with one exception at the Mount Timpanogos Transit Center. Though the number of stop to stations is not the same, the increased amenities, travel time and headways would drive people to travel farther to access the new service. When the comparison of stops with a quarter mile radius are overlaid with the new stations having a half mile radius, the populations excluded from this radius is minimal and within UTA’s threshold for Disparate Impact and Disproportionate burden. When mitigating stops from the 826, 850 and 811 are added, the number of people that do not fall within a quarter mile to a mitigating stop and/or a half mile to a BRT station decreases 82%. There is, however, a shift in demographics that may indicate that the low-income populations exceed the threshold set by the Authority in regards to disproportionate burden. However, considering the population size and the demographics of those directly impacted by the replacement being within the threshold, UTA has determined that this would *not* be considered a disproportionate burden.

Replacement of Route 838

There were no findings of a disparate impact or disproportionate burden in the removal of the 838. In examining the new stops with a half mile walk radius, we actually find that the numbers this route could serve is 51% low-income and 61% are minority. Close to 400 additional people fall within this new expanded walk radius and those who were added have a greater concentration of low-income and minority populations. Below are tables showing the demographics of those in the BRT as compared to the 838. There were no census blocks excluded from the comparison and there is likely a net gain for protected populations as shown in the tables below.

Provo-Orem BRT Stops covering the 838:

<i>Low-Income Population:</i>	
Population:	1866
Low-Income Population:	967
Percent Low-income:	51% (+30.6)

<i>Minority Population:</i>	
Population:	1914
Minority Population:	1174
Percent Minority:	61% (+39.1%)

Route 838:

<i>Low-Income Population:</i>	
Population:	1,546
Low-Income Population:	785
Percent Low-income:	50.8% (+30.4%)

<i>Minority Population:</i>	
Population:	1,519
Minority Population:	928
Percent Minority:	58.3% (+36.4%)

862 Alignment Changes

There were no findings of a disparate impact or disproportionate burden in the proposed alignment changes to the 862. The changes on the east side of the 862 will not provide any stop changes, excluding the Timpanogos Transit Center stop shifting to one that will connect riders to the Provo-Orem BRT. These changes have been determined to not detrimentally impact riders. The riders on the west side will benefit from the proposed addition of routing connecting Utah Valley University to the FrontRunner Station. The populations now receiving access to this route are listed below and are not outside of the UTA threshold for disparate impact or disproportionate burden in that they do not *negatively* impact low income and minority populations in excess of 5%, whereas the addition *positively* impacts the population below.

<i>Low-Income Population:</i>	
Population:	2559
Low-Income Population:	609
Percent Low-income:	25.5% (+5.1%)

<i>Minority Population:</i>	
Population:	3577
Minority Population:	609
Percent Minority:	17% (-4.9%)

Mt. Timpanogos Transit Center

In examining the changes being made to the Mt. Timpanogos Transit Center, it is clear that this detour would not have been efficient when trying to run the kind of service that the BRT will run. It requires light dependent left hand turns and a station is proposed to be built within one quarter mile of the Transit Center. Excluding this stop is easily mitigated by nearby route 862 stops where the route 862 will provide a connection to the Provo-Orem BRT station. The other changes being made to connect riders to the BRT instead of detouring to the Mt. Timpanogos Transit Center are required to access the new service and be effective. When considering the demographics of those being impacted, UTA does not identify any disproportionate burden or disparate impact in this change. The new station and mitigating stops provide adequate service to connect those used to boarding the 830 or other routes at this center.

Fare Considerations

The low-income and minority riders on the 830 are greater than the system average established by the most recent ridership survey. In consideration of this, UTA does not find a disproportionate burden or disparate impact on protected populations if the fare were sponsored as has been proposed. All riders, regardless of their status, would equally have access to the sponsored fare and the geographic and ridership data both indicate that this sponsored fare would be offered to minority populations equally or in excess of the system average and far exceed the system average for low-income populations.

Route 821 – Realignment

According to ACS data, the proposed changes would result in direct access to *this route* being eliminated to 680 people. The demographics of those individuals does result in a disparate impact and a disproportionate burden as more than half of those impacted have been identified as minority and/or low income. The proposed reroute would, however increase the number of people with a quarter mile walk access to this route by 13 times. Those with increased access are more than twice the system average in low-income (21.9%) and 10.5% over the system average for the minority population. In addition to the increased access brought by the 821 proposed realignment, those that live in the area where the route currently runs have access to the Provo-Orem BRT which will have increased service and will bring a direct connection to the proposed alignment of the 821. With the increased service on the BRT in the area and the added populations with access to the 821, it would appear that there is an actual net gain for minority and low-income populations than if service were not changed in the area. As this analysis is being performed prior to a public comment period, the feedback of the public will be accounted for as prior to this proposal being implemented.

Route 862 – Addition to Route

There were no findings of a disparate impact or disproportionate burden in the realignment of the 862. This does not exclude any populations from the change, but adds service and stops that mitigate some of the stops excluded in the 830 to Provo-Orem BRT replacement.

Route 840 – Elimination

There were no findings of a disparate impact in the proposed elimination of the 840. The data does indicate a disproportionate burden. In reviewing the proposal UTA has determined that in

removing this route from service in order to allocate resources to the much more heavily used 841, which services all the same stops, that the riders using this route will have an adequate mitigation in place to which they can plan their transit needs and would benefit from the increased capacity from the Provo Central Station to locations around campus.

Additional Proposed Changes

Route 821 – Split into 821 & 823

The northern realignment of the 821 was reviewed in the previous section and those concerns were addressed in that section of the analysis. When reviewing the additional proposal to realign the route to exclude stops between Spanish Fork and Springville, the data below shows the number of people excluded by this proposal not already analyzed in the 821 realignment.

Minority Population Losing Access	
Total Population:	1,114
Minority Population:	82
Percent Minority:	7.3% (-14.6%)

Low-income Population Losing Access	
Total Population:	1,070
Minority Population:	416
Percent Minority:	38.9% (18.5%)

As the table above indicates, there is a finding disproportionate burden, but no disparate impact on those that would lose access from the proposed change. It is worth noting again that the stops the proposal would eliminate, the most used stop averages 11 boardings per day and is 1,085 feet from a stop that will still be serviced. Of the remaining eight stops that would be eliminated, half of them average zero boardings per day and the other half do not exceed three average boardings per day. UTA is yet to go to public comment regarding this proposal and has not received budgetary approval to proceed, but will consider the feedback received regarding the change prior to implementation. Steps will be taken to avoid, minimize or mitigate any potential impacts that may be brought to light through the public comment period.

Based on ridership and the projected benefits UTA, has determined that there is a legitimate business justification to proceed with changes if approved.

Route 862 – Split into 846 & 849

There were no findings of a disparate impact or disproportionate burden in the proposal to create two routes out of the 862. There were no populated census blocks removed from a quarter mile walk access to current service and the populations with added service by the proposal are above both the low-income and minority system averages.

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE AUGUST 2018 CHANGE DAY
TITLE VI EQUITY ANALYSIS**

R2018-06-06

June 27, 2018

WHEREAS, the Utah Transit Authority (the "Authority") is a public transit district organized under the laws of the State of Utah and was created to transact and exercise all of the powers provided for in the Utah Limited Purpose Local Government Entities – Local Districts Act and the Utah Public Transit District Act; and

WHEREAS, the Board of Trustees of the Authority (the "Board"), in keeping with the Federal Transit Administration's requirements for public transit agencies and the Civil Rights Act of 1964 has considered and reviewed the April 2018 Change Day Title VI Equity Analysis ("Title VI Equity Analysis") prepared by Authority staff; and

WHEREAS, the Board has desires to approve the Title VI Equity Analysis.

NOW, THEREFORE, BE IT RESOLVED by the Board of the Authority:


1. That the August 2018 Change Day Title VI Equity Analysis prepared by Authority staff, a copy of which is attached hereto as Exhibit A, is hereby approved by the Authority.
2. That the Board hereby ratifies any and all actions taken by the Authority's Interim Executive Director and staff in furtherance of and effectuating the intent of this Resolution.
3. That a copy of this Resolution shall be submitted to the Federal Transit Administration.
4. That the corporate seal be attached hereto.

APPROVED AND ADOPTED this 27th day of June, 2018.



Greg Bell, Chair
Board of Trustees

ATTEST:



Robert K. Biles, Secretary/Treasurer

(Corporate Seal)




CERTIFICATE

The undersigned duly qualified Chair of the Board of Trustees of the Utah Transit Authority certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Board of Trustees held on the 27th day of June, 2018.



Greg Bell, Chair
Board of Trustees



Robert K. Biles, Secretary/Treasurer

Approved As To Form:



Legal Counsel

Exhibit A



Title VI Service Equity Analysis

August 2018

Utah Transit Authority
Prepared by: Andrew Gray
Graphics and Data: Joseph Taylor

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Utah Transit Authority has committed to the Federal Transit Administration's (FTA) Title VI objectives set forth in Circular 4702.1B by ensuring that UTA's services are equitably offered and resources distributed without regard to race, color, or national origin.

The following analysis is of proposed changes to be implemented in August of 2018. These changes are being proposed to protect public funds and improve functionality of the system. Though the proposed changes are facially neutral, this analysis, in accordance with FTA requirements, will ensure that these changes will not have disproportionately negative impact on minority and low-income populations within UTA's service area. If these changes are found to be discriminatory, UTA will take all prescribed and prudent steps to ensure services are equitable and compliant with federal guidelines and requirements.

Summary of Proposed Changes

Routes 39 and 41 – End of Line Changes:

It is proposed to change the end of line (EOL) locations of routes 41 and 39, which would modify the overall length of the routes. This will impact route 39 by increasing the overall length of the route and route 41 by decreasing the overall length of the route. UTA policy states that a proposed twenty-five (25%) or greater change in route alignment is considered a major change and requires a Title VI analysis.

FrontRunner Commuter Rail – Elimination of Station:

It is proposed to eliminate the Pleasant View commuter rail station. Current service runs to this station four times per day and utilizes Union Pacific (UP) rails which requires UTA to pay for their use. With the implementation of Positive Train Control, the costs to have UTA continue to use UP rails would be prohibitively high. These costs, combined with low ridership, has motivated the proposal to eliminate service to this station. Although the elimination *does not* meet UTA's major change policy, UTA will analyze the proposal in order to ensure that the proposed change does not disproportionately negatively impact protected populations.

Provo-Orem BRT – Proposed Adjustment

In conjunction with the Provo-Orem BRT's operation, there is a slight adjustment to a parallel route that is examined in this analysis. The proposed change is *not* considered a major change. The change does not eliminate any stops, but adds five new stops near student housing.

UTA Policy and Definitions

UTA has developed corporate policy 1.1.28 Title VI Compliance Policy to define and evaluate the impacts of proposed major services changes on minority and low-income populations in conjunction with a public outreach process. In developing this policy, UTA solicited feedback through newspapers within the service area, published on UTA's website (rideuta.com), and Utah's government website in the public notices section (Utah.gov) which provides translation options. In conjunction with the Salt Lake County Office of Diversity Affairs, which maintains an email list of local entities and individuals with interest in diversity issues, UTA sent an email notification soliciting feedback in the development of this policy. Additional targeted outreach was done, which included mailing a letter and the policy or sending emails to community organizations that work with minority or low-income populations.

The following references to policy are from subsections of corporate policy 1.1.28 and were created to ensure that all equity analyses are performed using the same parameters and are in line with FTA Circular 4702.1B.

Definitions

- A. *"Disparate Impact"* refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- B. *"Disproportionate Burden"* refers to a neutral policy or practice that disproportionately affects the low-income population more than non-low-income populations.
- C. *"Low-income Population"* refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/ transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.
- D. *"Minority Person"* include the following:
 - 1. American Indian or Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 - 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia,

China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
 5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- E. "Minority Population" means any readily identifiable group of minority persons who live in geographic proximity.
- F. "National Origin" means the particular nation in which a person was born, or where the person's parents or ancestors were born.
- G. "System Average" The system average is the averages of minorities and low-income persons within the total populous of the geographic regions UTA serves. The present system averages are expressed below in tabular format using 2011-2015 5-year population estimates provided by the American Community Survey (ACS).

<i>Low-Income System Average:</i>	
Population:	2,243,746
Low-Income Population:	457,949
Percent Low-income:	20.4%

<i>Minority System Average:</i>	
Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Major Service Change

UTA will consider the following types of changes to be "major changes", which require public input and a Title VI equity analysis in compliance with FTA's Circular 4702.1B

- a) The Addition of Service;
- b) A proposed service level reduction in miles, hours, or trips of thirty three percent (33%) or more of any route;
- c) The elimination of all service during a time period (peak, midday, evening, Saturday, or Sunday);
- d) A proposed twenty-five (25%) or greater change in route alignment;
- e) A proposed fare change.

Evaluation and Analysis of Service and Fare Changes

1. UTA will analyze proposed major changes to service and any proposed fare changes in accordance with FTA's Circular C 4702.1B as amended.

2. UTA will evaluate the impacts of all major service changes cumulatively when there is more than one route being affected for a service change period
3. UTA will primarily utilize American Community Survey (ACS) Data, block group data and/or ridership data to evaluate and analyze any proposed major service and fare changes. This data will be analyzed with Geographic Information System (GIS) software.
4. UTA will rely on population data and use the smallest geographic area that reasonably has access to the stop or station effected by the proposed major service change. This will be translated into a one-quarter mile radius to a bus stop, one-half mile to a light rail station and three miles to a commuter rail station.

Disparate Impact and Disproportionate Burden

1. UTA will measure the burdens of service and fare changes on minority riders to determine when minority riders are bearing a disparate impact from the change between the existing service or fare and the proposed service or fare.
2. UTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service or fare and the proposed service or fare.
3. A threshold of 5% will be used to determine disparate impact on minority populations and disproportionate burden on low-income populations. This 5% is based on the margin of error from the US Census data that UTA uses to determine the populations in the service area. This means that if the burden of the service or fare change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, then the change will be considered either a disparate impact or a disproportionate burden.

Finding a Disparate Impact

1. At the conclusion of UTA's Analysis, if UTA finds a disparate impact on the basis of race, color, or national origin, UTA shall seek to modify the proposed changes in a way that will mitigate the adverse effects that are disproportionately borne by minorities. Modifications made to the proposed changes must be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts.
2. If UTA chooses not to alter the proposed services changes despite the potential disparate impact on minority populations, or if UTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service or fare change, UTA may implement the change only if:

- a. UTA has substantial legitimate justification for the proposed change; and
- b. UTA can show that there are no alternatives that would have a less disparate impact on the minority riders but would still accomplish the transit provider's legitimate program goals. In order to show this, UTA must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative

Finding a Disproportionate Burden

If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. UTA will also describe alternatives available to low-income passengers affected by the service changes.

Proposed Changes

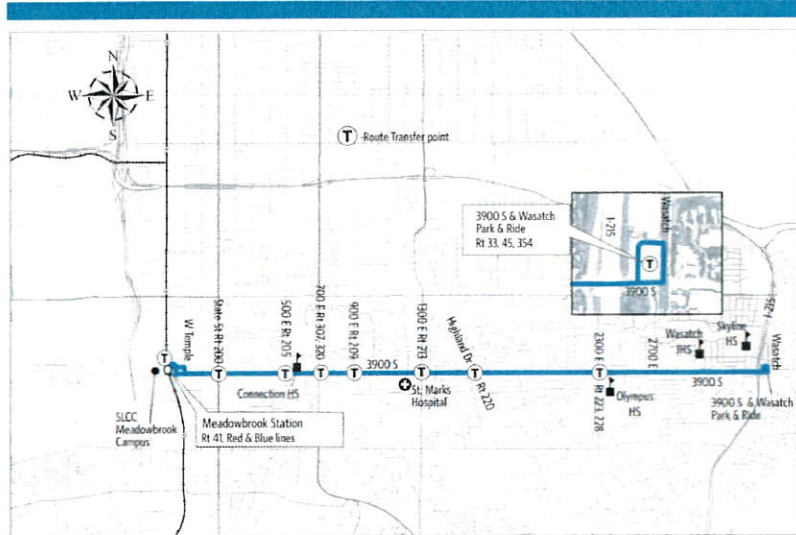
Routes 39 & 41

Presently, route 39 runs from the Wasatch Park and Ride, continues along 3900 South, and into the Meadowbrook Station, which is also serviced by route 41 and the Red & Blue TRAX light rail lines.

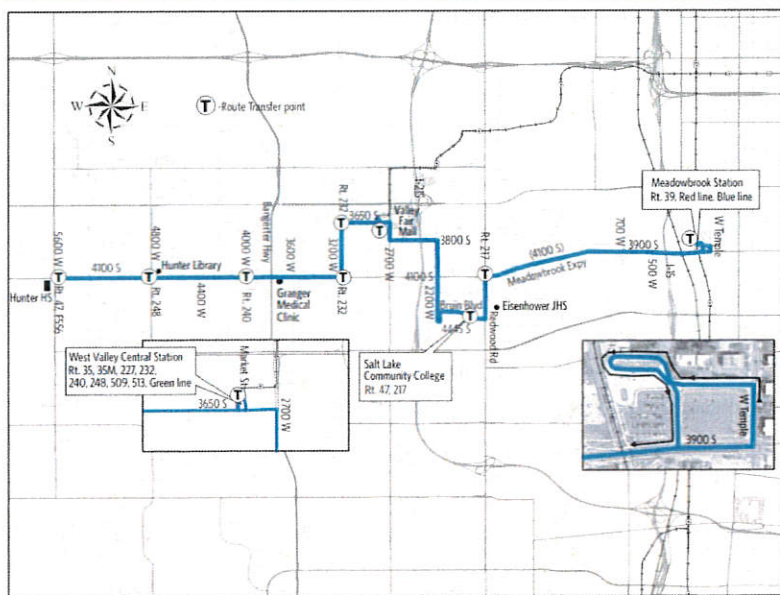
The 41's current alignment runs from the Meadowbrook station and proceeds west until Hunter High School. Route 39 buses stop at the End Of Line (EOL) and proceed to run on route 41 and vis-versa.

It has been proposed to change where the EOL on both routes end in order to improve transfers to TRAX Green line. Although the EOL shift triggers UTA's major change policy, there should not be an impact on the community's access to the route. There are no stops being eliminated nor any realignment of either routes. As in present service, the same buses would run the route of the 41 and 39 and the only adjustment will be where the bus stops for the end of line and the route number changes. There will be some schedule changes on when stops are serviced, but these changes were communicated in the public outreach efforts described in Appendix A and through new printed and electronic schedules.

Route 39 - 3900 South

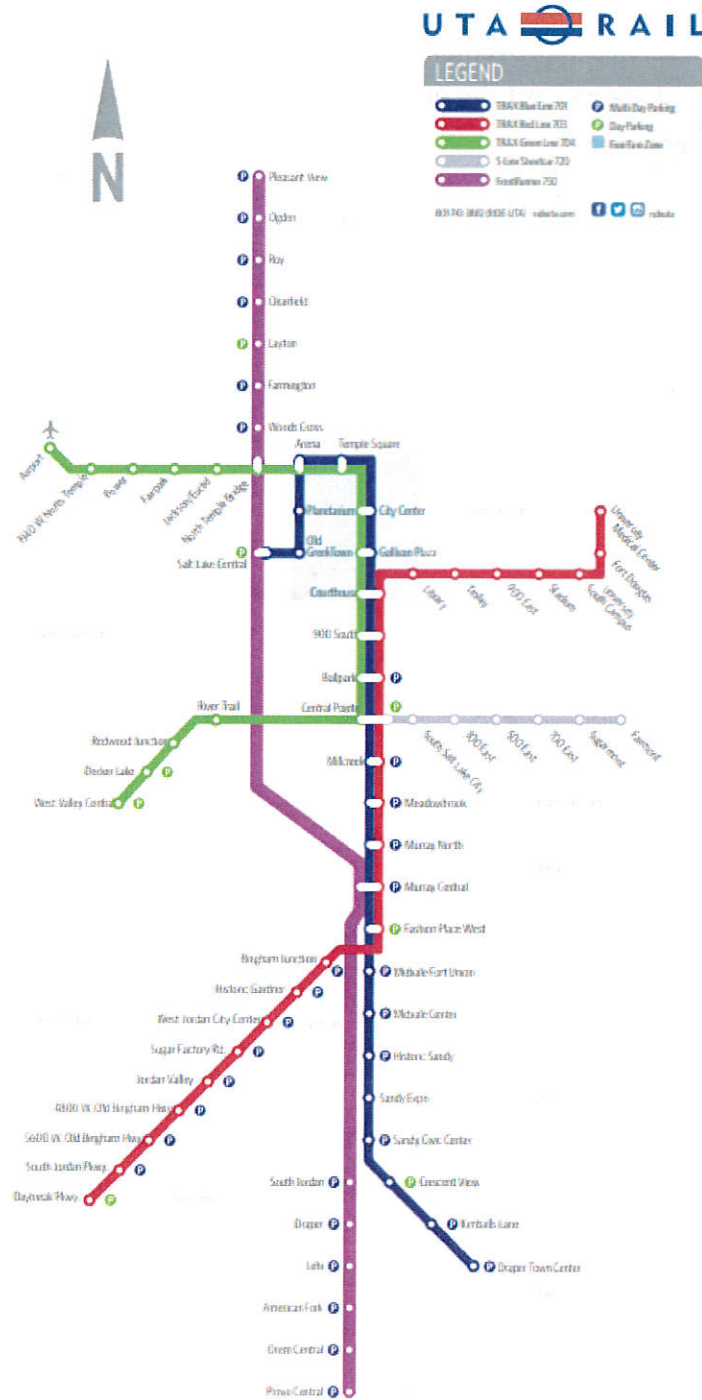


Route 41 - 4100 South



FrontRunner – Station Elimination

UTA's Commuter Rail runs along the Wasatch Front providing quick travel north and south and is ideal for commuters traveling long distances. The current proposal is to eliminate service to

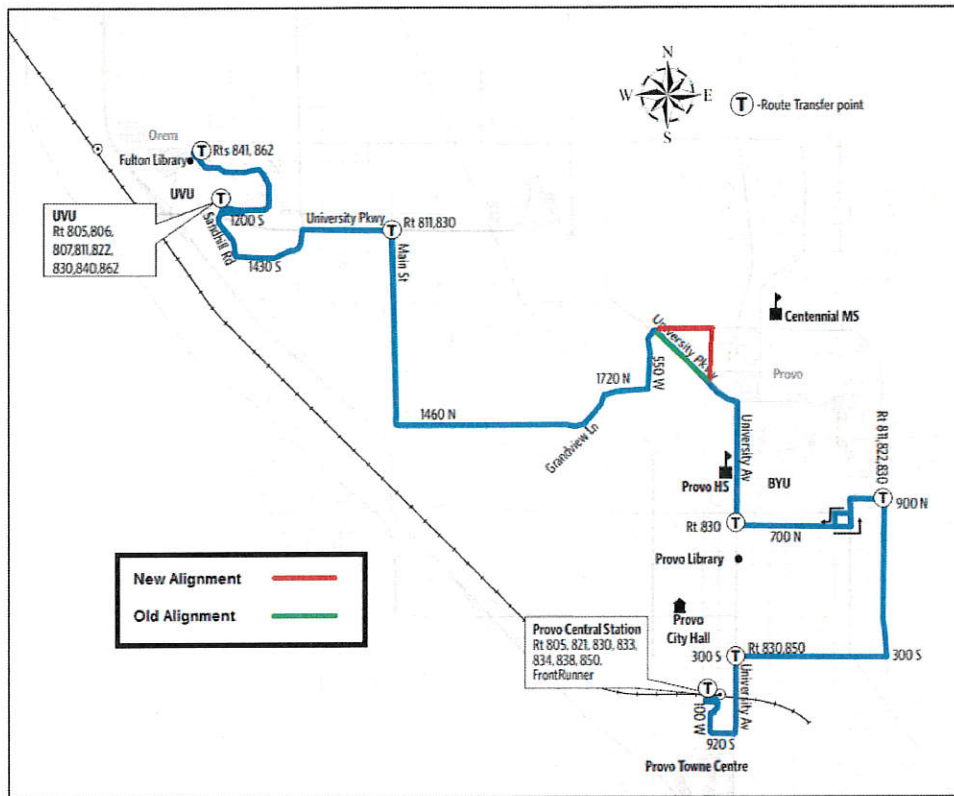


the northern-most station in Pleasant View, Utah. The train runs only four times per day and, unlike other portions of the line to the south, does not have UTA owned track running directly to it. Instead, UTA must pay for the usage of the Union Pacific railways. With the requirement to participate in Positive Train Control, UTA would need to install Union Pacific positive train control equipment on the commuter rails that would use their rails. The initial cost to install PTC equipment is estimated at \$1.4 million and an annual operating cost of more than \$200,000. Daily ridership between Ogden and Pleasant View has averaged 6 to 8 passengers per one-way trip. After conferring with the Federal Transit Authority, it was determined that it was allowable and in the best interest of UTA to discontinue service to this stop. To review the efforts UTA took to involve the community in this decision, please see Appendix A. UTA is also offering more extensive bus service that provides a way to get from the Pleasant View station to the Ogden station.

Proposed New Options for FrontRunner Riders

The Ogden Business Unit has proposed additional bus service for riders of FrontRunner to travel from the Pleasant View Station to the Ogden station. The bus route 616 has new trips and extended trips that presently do not run the full bus route which will offset the loss of the commuter rail. Although there will not be service improvements to route 630, UTA plans to improve the 630's stops on Highway 89 that are nearest the Pleasant View Station, with curb, gutter, sidewalk, ADA landing pad, and amenities.

Route 831 – Alignment Change



FTA Circular 4702.1B specifically requires “transit providers that have implemented or will implement a New Start, Small Start, or other new fixed guideway capital project *shall conduct a service and fare equity analysis*. The service and fare equity analysis will be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of ‘major service change’ as defined by the transit provider. *All proposed changes to parallel or connecting service will be examined.* [Emphasis added]”

Pursuant to this guidance and requirement, UTA conducted and presented a Service and Fare Equity Analysis for the Provo-Orem BRT fixed guideway project and related changes. In consultation with the public it became evident that changes made to the alignment of route 834 to allow passengers to transfer to the BRT inadvertently eliminated access to transit for some student housing apartment buildings. In order to alleviate this issue, it is proposed to change the alignment of the 831 to service the stops previously serviced by the 834. In consultation with the FTA, UTA determined that in order to fully comply with the sections of the circular cited, the proposed change should be analyzed even though it does not “rise to the level of a ‘major service change’ as defined by” UTA.

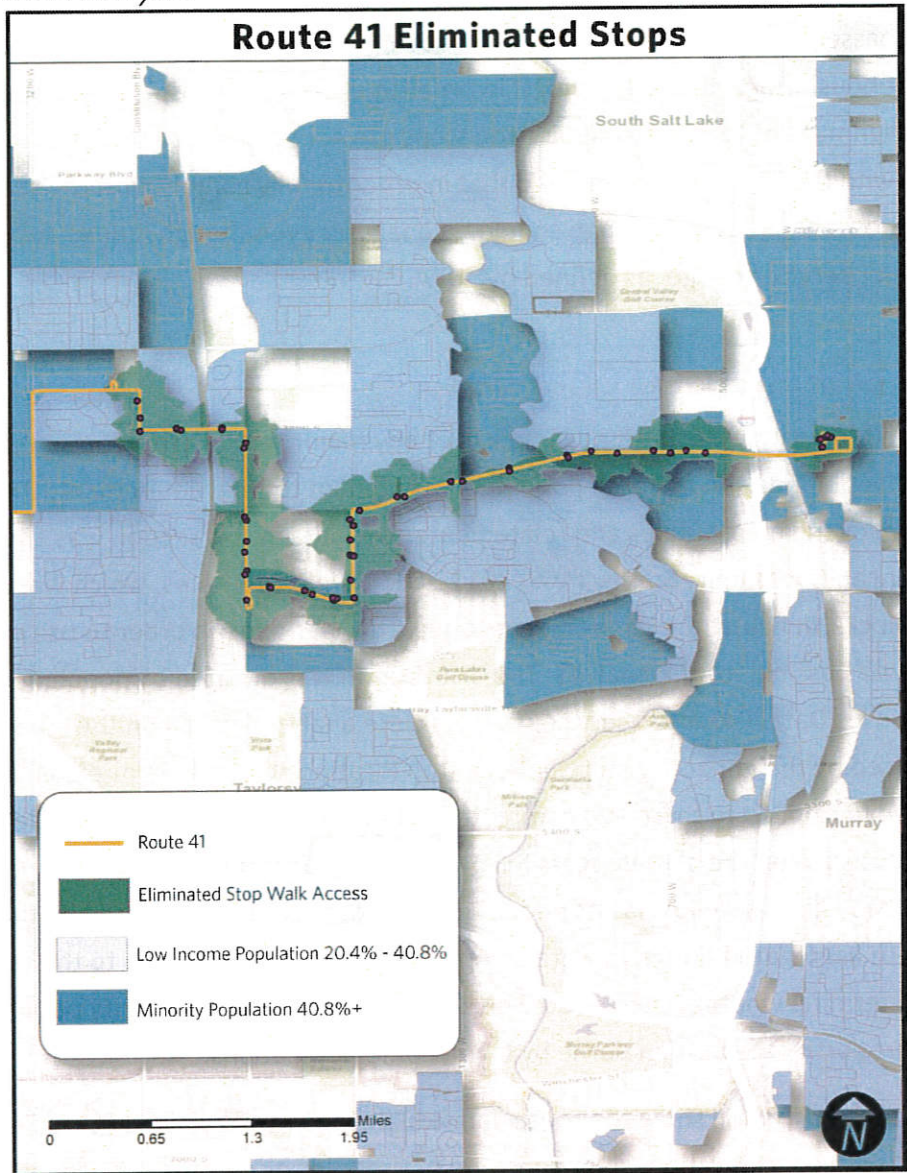
Analysis of Proposed Changes

UTA is required to analyze the potential impacts of any major service change as it relates to low-income populations and minority populations. Pursuant to this requirement, UTA has created the following maps, tables and related data. The data in this section was compiled utilizing American Community Survey (ACS) 2011-2015 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups. This was done in order to use the smallest geographic area possible for the analysis. The distribution was dictated by population ratios from 2010 Census Data. Proposed service changes were analyzed based on the stops and stations serviced by the impacted route. All bus stop locations have had a one quarter mile walkability radius applied to them and commuter rail stations have had a three mile walkability radius which is based on the actual accessibility of the stop or station by road. Any census block that is overlapped by this radius has its population included as those impacted by the proposed changes. These aggregated numbers were compiled as a comparison group to the service area average to determine whether there would be a disparate impact on minority populations and/or a disproportionate burden borne by low-income populations.

The maps in this section will show the route, individual stops with a walkability radius, and census blocks with concentrations of low-income households or minority individuals above the system average, which are shaded according to density.

Routes 31 & 49

Low-Income Analysis

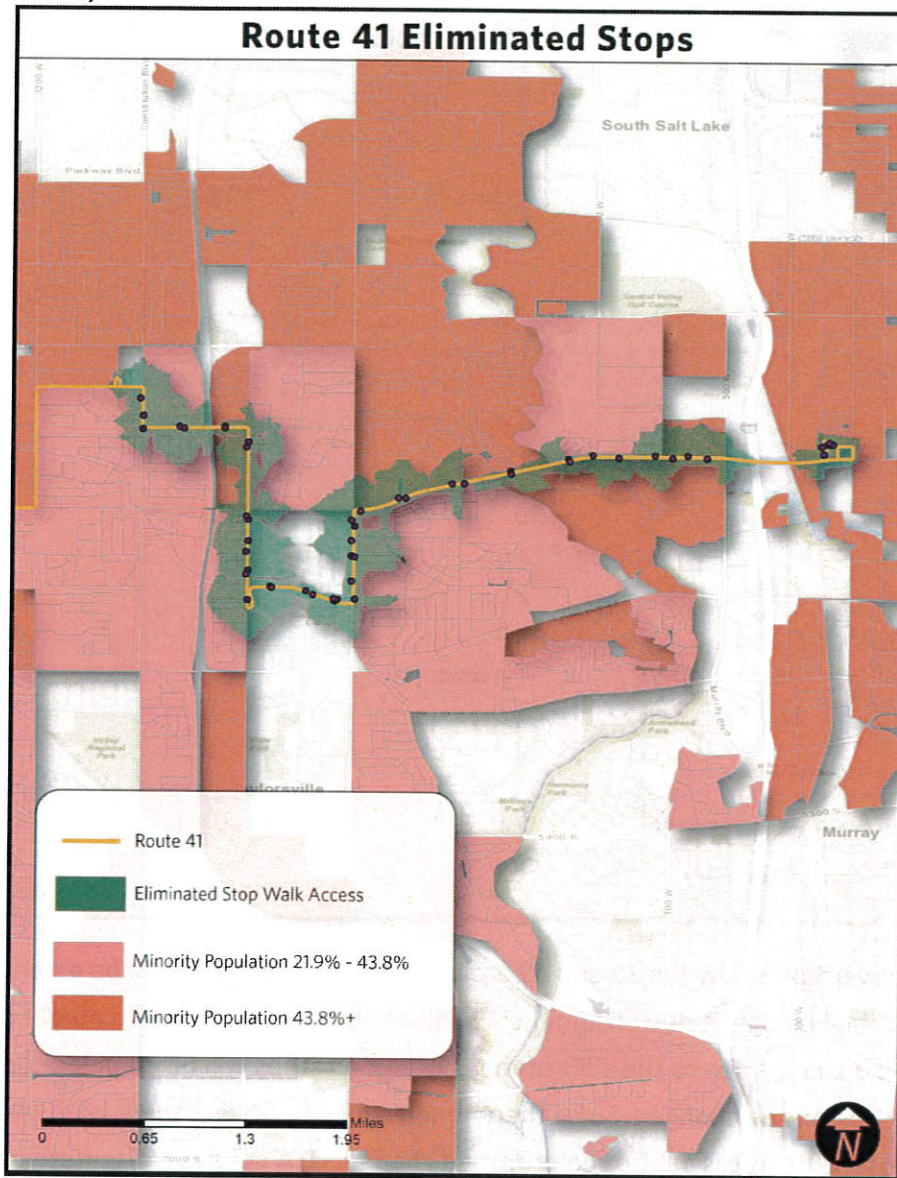


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Pleasant View Station	
Total Population:	16,608
Low-income Population:	5,792
Percent low-income:	34.9% (14.5%)

As expressed in the table and figure above, the low-income populations with access to the stops being shifted from route 39 to route 41 is 14.5% above the system average.

Minority Analysis

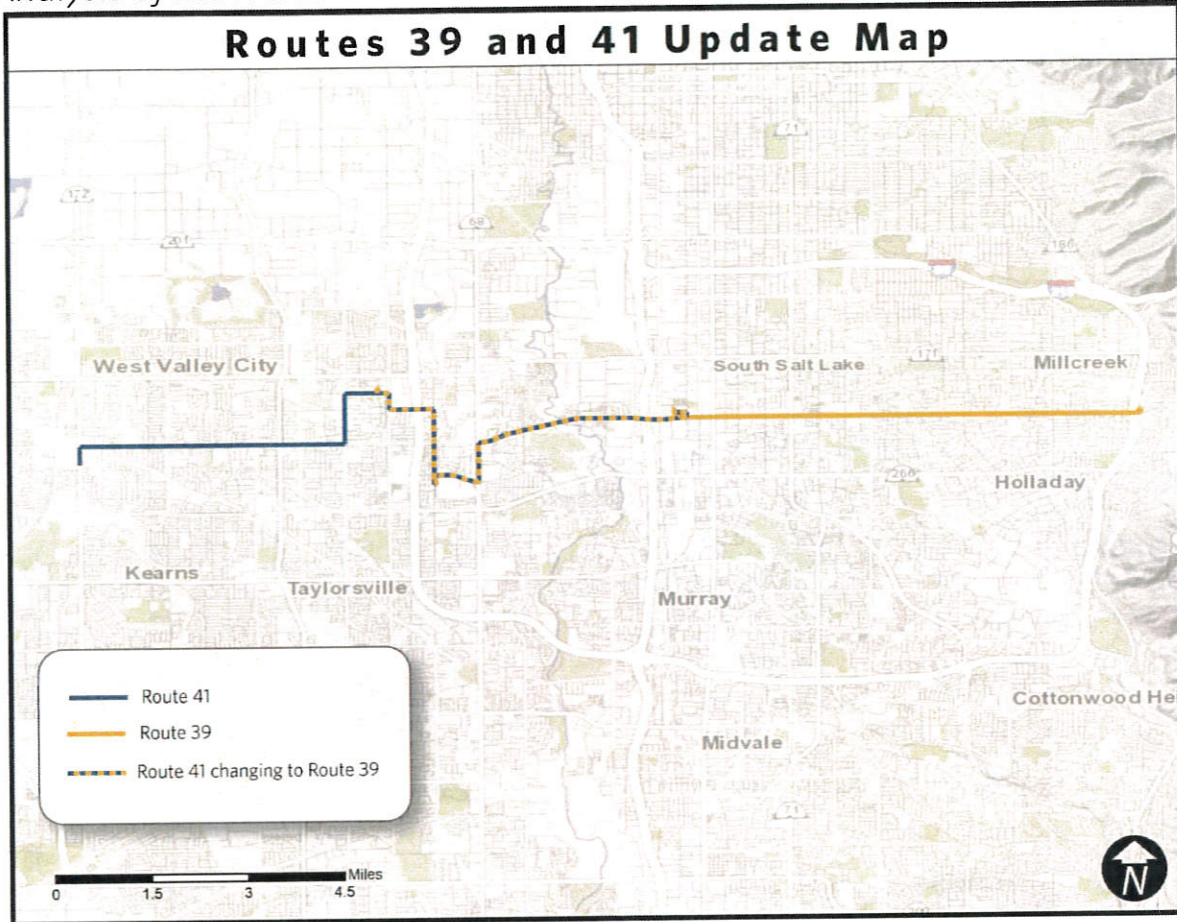


Minority System Average	
Total Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Route 864	
Total Population:	16,976
Minority Population:	7,636
Percent Minority:	45% (23.1%)

As expressed in the table and figure above, the minority populations with access to the stops being shifted from route 39 to route 41 is 23.1% above the system average.

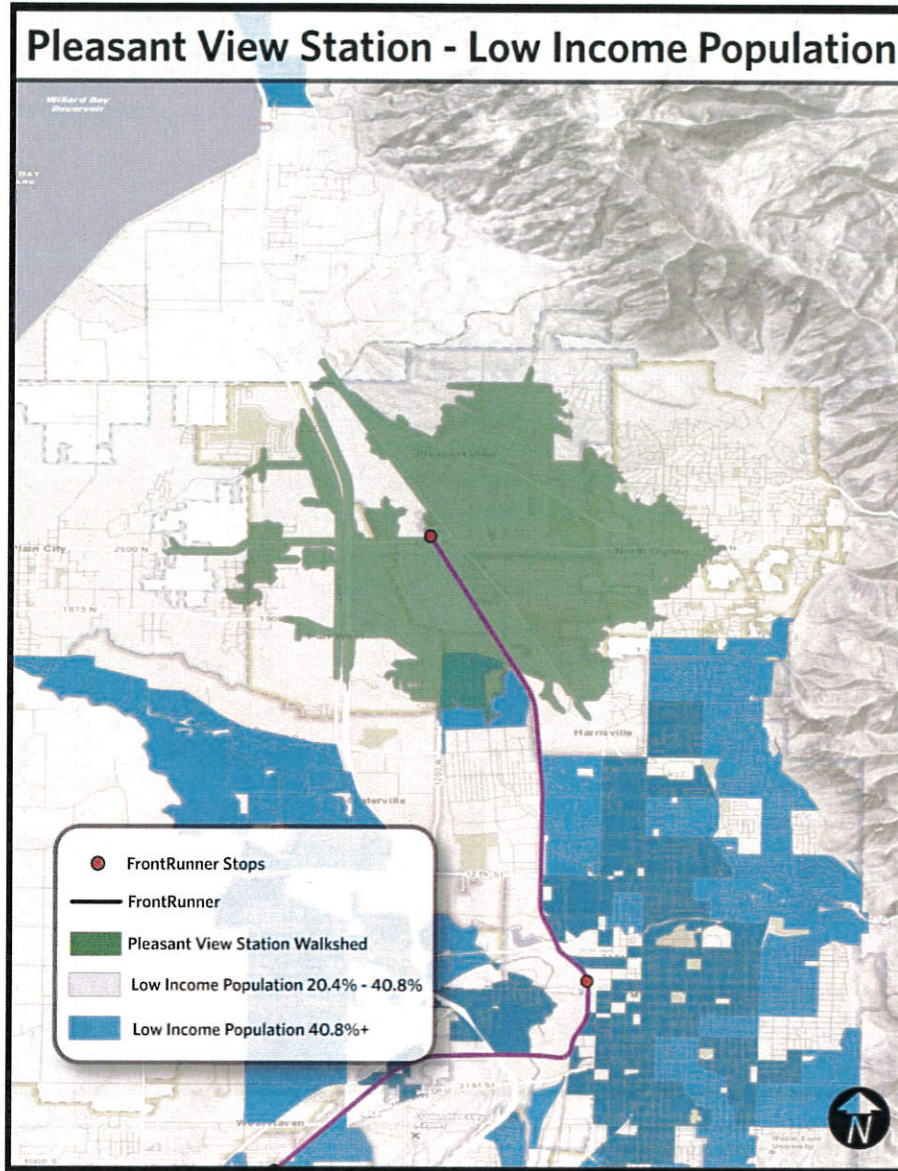
Analysis of Lost Access



The image above shows how the 31 and 49 are being modified. The 39 will be extended through all of the line that is dotted and the 41 will be shortened. The route numbers servicing the stops would change due to the shift of the EOL, but no stops will be eliminated nor will actual access to stops be changed. Since there is no change to access, there is no *negative* impact on those with access due to the proposed change. UTA defines a disparate impact and disproportionate burden as a proposed change that causes conditions to be “5% worse” for minority and/or low income populations.

FrontRunner – Station Elimination

Low-Income Analysis

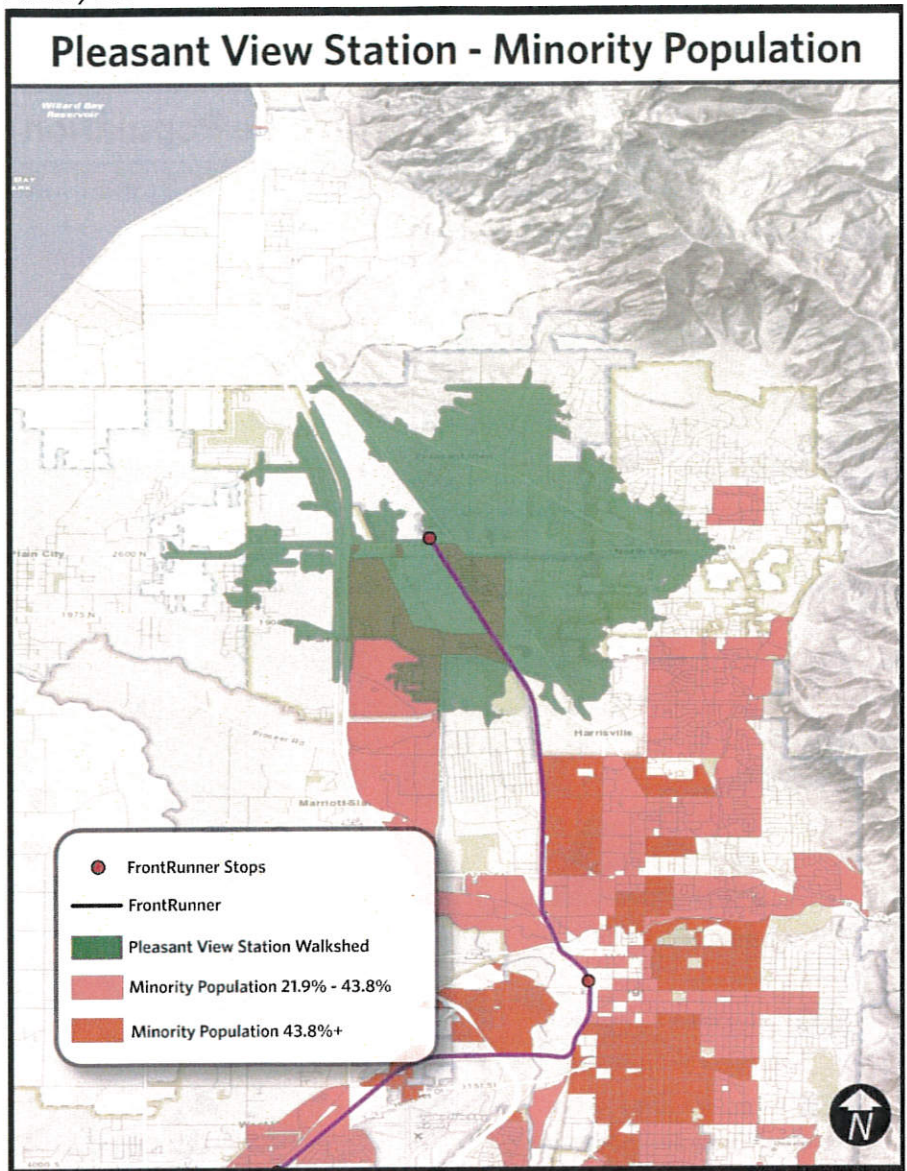


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Pleasant View Station	
Total Population:	25,233
Low-income Population:	2,669
Percent low-income:	10.6% (-9.8%)

As expressed in the table and figure above, the low-income populations impacted by this station’s elimination is 9.8% below the system average.

Minority Analysis



Minority System Average	
Total Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Route 864	
Total Population:	25,861
Minority Population:	2,942
Percent Minority:	11.4% (-10.5%)

As expressed in the table and figure above, the minority populations impacted by this station’s elimination is 10.5% below the system average.

Route 831 - Realignment

Low-Income Analysis

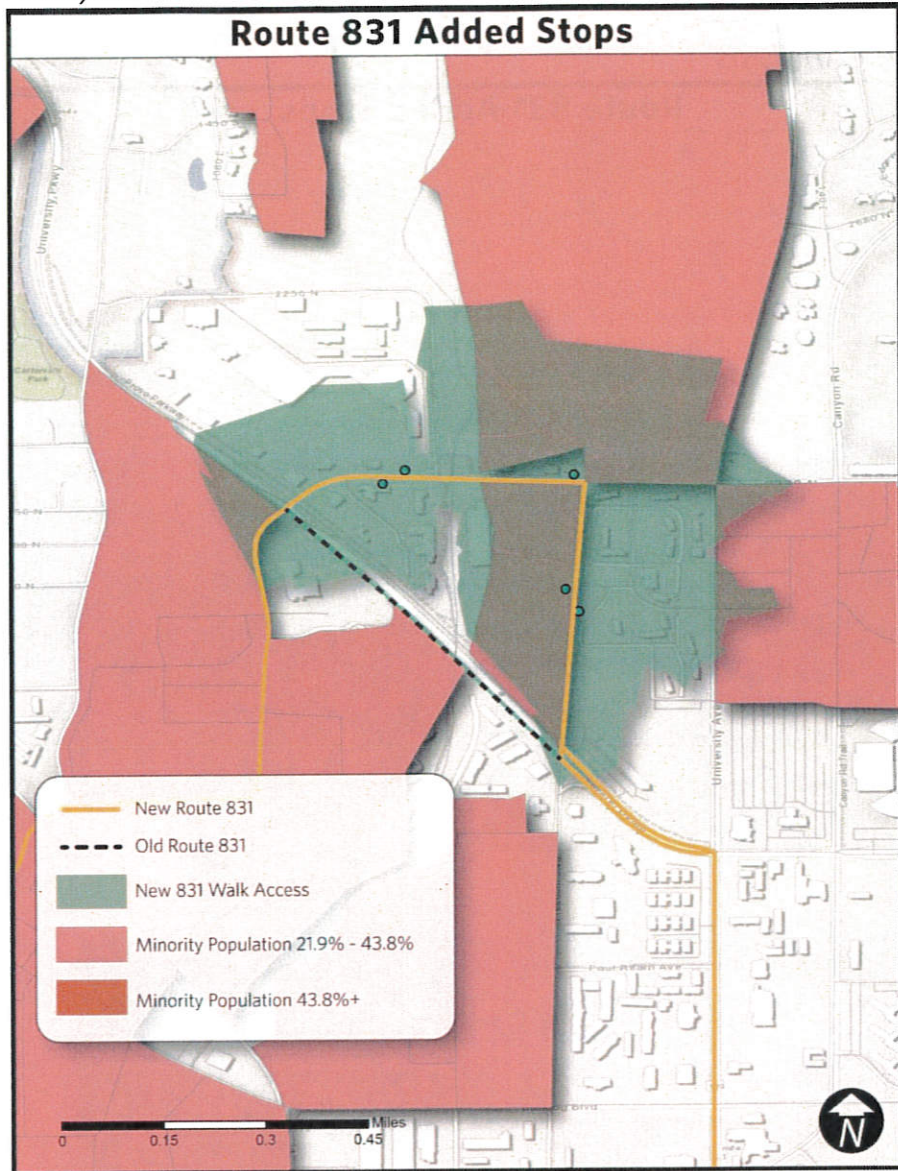


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Pleasant View Station	
Total Population:	2,516
Low-income Population:	1,527
Percent low-income:	60.7% (-40.3%)

As expressed in the table and figure above, the low-income populations benefitting from this alignment change is 40.3% above the system average.

Minority Analysis



Minority System Average	
Total Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Route 864	
Total Population:	2,948
Minority Population:	598
Percent Minority:	20.3% (1.6%)

As expressed in the table and figure above, the minority populations benefitting from this alignment change is 1.6% below the system average.

Findings of Analysis

Routes 31 & 49 – Change of End of Line:

There were no disparate impacts or disproportionate burden found in the analysis of this service change. The change of End of Line does not produce any negative impacts on the surrounding population when considering that the only practical change is where the route numbers change and some scheduling changes.

FrontRunner Commuter Rail – Eliminate Station:

There were no disparate impacts or disproportionate burden found in the analysis of this service change. The impacted populations were well below the system averages for both minority and low-income populations.

Route 831 - Realignment

There were no disparate impacts or disproportionate burden found in the analysis of this service change. Since no stops were eliminated in this realignment and the populations now covered by the new stops are close to the system average for minority populations and almost three times the system average for low-income populations this change is likely a net gain for low-income populations.

Appendix A – August 2018 Change Day Public Comment Report

August 2018 Change Day Public Comment Report

Prepared by Andrea Packer, Communications Director & Public Hearing Officer

Timpanogos Business Unit

For August 2018 Change Day, the UTA Timpanogos (Utah County) Business Unit proposed changes to several routes. The proposed changes were as follows:

New Service

- The Provo-Orem BRT, now called the Utah Valley Express or “UVX,” will begin operation, replacing the Routes 830 and 838 fixed bus service.

Alignment Changes

- Route 821: realigned near the Provo Towne Center Mall to use University Avenue between East Bay Blvd. and 920 South in both directions in south Provo. Provo Towne Centre Mall will be served by UVX.
- Routes 811/850/862: stop changes in Orem to connect to UVX near Orem University Place Mall.

Connecting changes

- Route 841: more trips to enhance connectivity between Orem Station/UVU.
- Route 840: eliminated around campus (all stops covered by 841).
- Route 862: extended to the Orem Station and replace some Route 830 stops.

Public Comments and Outreach

In accordance with UTA policy, a public comment period was held from April 25 through May 24, 2018. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- A public hearing notice was published in the *Provo Daily Herald*, on the state’s public notice website and on rideuta.com. Information on the comment period and hearing was also published on UTA’s social media channels.
- Three formal public open houses were held: on May 15 from 5-7 p.m. at the Provo City Library; on May 16 from 6-8 p.m. at the Spanish Fork Senior Center; on May 17 from 5-7 p.m. at the American Fork Senior Center.
- A total of 10 people attended the two public hearings.
- Comments were accepted via UTA’s website, via email at hearingofficer@rideuta.com, through the mail and by phone.

A total of seven comments were received regarding the service proposals. One via email and six at the public open houses. Comments included excitement about the opening of the UVX and support for FrontRunner service and passes for UVU, desire for more bus service overall, and concern/suggestions for improving connections/transfers between FrontRunner and bus. One person commented that it’s difficult to go to Salt Lake County for paratransit eligibility.

Based on the feedback received and other factors, the proposed service changes will be implemented on August 13, 2018. In addition, an unrelated comment received regarding Route 831 was adopted by UTA service planners.

Salt Lake Business Unit

For August 2018 Change Day, the UTA Salt Lake (Salt Lake County) Business Unit proposed changes weekday and Saturday changes to Routes 33, 35 and 35M, and changes to Routes 39 and 41. The proposed changes were as follows:

Weekdays

- Route 35M: Begin service at 6 a.m. and end service at 7 p.m.
- Route 33 and 35: Begin service at 4:15 a.m. from Magna and 5:15 a.m. from Millcreek Station. Service would begin early enough from Magna that the existing connection to the first northbound Blue Line TRAX would be maintained. End service at 10:30 p.m. from Magna and 11:30 p.m. from Millcreek Station.

Saturdays

- Route 35M: Begin service at 9 a.m. and end service at 7 p.m.
- Route 33 and 35: Begin service at 6 a.m. and end service at 11 p.m. Service on 3300 South between Millcreek Station and Wasatch Blvd. would largely remain the same.

Routes 39 and 41: to make better connections to the Green Line at West Valley Central Station.

- Route 39: extend west from Meadowbrook Station to West Valley Central Station via the current Route 41 alignment. At West Valley Central Station, Route 39 would turn into Route 41, maintaining a one-seat ride between Wasatch Blvd. and 5600 West.
- Route 41: shorten route to end at West Valley Central Station on the eastern end. At West Valley Central Station, Route 41 would turn into Route 39, maintaining a one-seat ride between 5600 West and Wasatch Blvd.

Public Comments and Outreach

In accordance with UTA policy, a public comment period was held from April 18 - May 17, 2018. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- A public hearing notice was published in the *Salt Lake Tribune and Deseret News*, on the state's public notice website and on rideuta.com. Information on the comment period and hearing was also published on UTA's social media channels.
- Two formal public open houses were held: on May 3 from 4-6 p.m. at West Valley City Hall; on May 9 from 6:30-8 p.m. at the Magna Library.
- A total of 6 people attended the public hearings.
- Comments were accepted via UTA's website, via email at hearingofficer@rideuta.com, through the mail and by phone.

A total of five (5) comments were received regarding the service proposals. One via email, one via phone to Eric Callison, and three at the public open houses. Comments included support for the changes to Route 39 and 41, concern about travel time on Route 35 versus Route 35M, concern about connections, and a comment about future plans to extend Route 35M to the top of 3300 South. Based on the feedback received and other factors, the proposed changes to morning service on Route 33, 35 and 35M will not be implemented. The remaining proposed service changes will begin August 13, 2018.

Ogden Business Unit

For August 2018 Change Day, the UTA Ogden (Davis and Weber Counties) Business Unit proposed the following service changes:

- FrontRunner: commuter rail service will be suspended between Ogden and Pleasant View after August 10, 2018.
- Route 616: modified schedule with increased frequency and span of service in conjunction with the FrontRunner changes.

Public Comments and Outreach

In accordance with UTA policy, a public comment period was held from May 1 – June 1, 2018. Several activities were conducted during this period to inform riders and the public and to obtain feedback:

- A public hearing notice was published in the *Ogden Standard Examiner*, on the state's public notice website and on rideuta.com. Information on the comment period and hearing was also published on UTA's social media channels.
- Two formal public open houses were held: on May 16 from 4:30 – 6:30 p.m. at the Pleasant View Municipal Building; on May 17 from 4:30 – 6:30 pm. at the North Ogden City Council Chambers.
 - A total of 1 person attended the public hearings.
- Comments were accepted via UTA's website, via email at hearingofficer@rideuta.com, through the mail and by phone.
- Two additional open houses were held in advance of the formal public hearings: May 12 in Pleasant View and May 14 in North Ogden.
 - A total of 41 people attended the open houses
- An on-board survey was also conducted of riders on FrontRunner between Ogden and Pleasant View (northbound and southbound) and on Route 616. The survey was also made available at the open houses.

A total of two comments were received regarding the service proposals, both via email. Comments included support for the proposed changes to Route 616 and expressed desire for more bus service – specifically on the west side of I-15 through Farr West - and future long-term improvements to FrontRunner. One comment reflected over-crowding on some trips since the previous change day. Based on the feedback received and other factors, the proposed service changes will be implemented on August 13, 2018.

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE DECEMBER 2018 CHANGE DAY
TITLE VI EQUITY ANALYSIS**

R2018-10-01

October 25, 2018

WHEREAS, the Utah Transit Authority (the "Authority") is a public transit district organized under the laws of the State of Utah and was created to transact and exercise all of the powers provided for in the Utah Limited Purpose Local Government Entities – Local Districts Act and the Utah Public Transit District Act; and

WHEREAS, the Board of Trustees of the Authority (the "Board"), in keeping with Federal Transit Administration's requirements and the Civil Rights Act of 1964, has considered and reviewed the December 2018 Change Day Title VI Equity Analysis ("Title VI Equity Analysis") prepared by Authority staff; and

WHEREAS, the December 2018 Change Day adds flex route service to Davis County; and

WHEREAS, the Title VI Equity Analysis found no disparate impact and no disproportionate burden; and

WHEREAS, the Board has desires to approve the Title VI Equity Analysis.

NOW, THEREFORE, BE IT RESOLVED by the Board of the Authority:

1. That the December 2018 Change Day Title VI Equity Analysis prepared by Authority staff, a copy of which is attached hereto as Exhibit A, is hereby approved by the Authority.
2. That the Board hereby ratifies any and all actions taken by the Authority's Interim Executive Director and staff in furtherance of and effectuating the intent of this Resolution.
3. That a copy of this Resolution shall be submitted to the Federal Transit Administration.
4. That the corporate seal be attached hereto.

APPROVED AND ADOPTED this 25th day of October, 2018.

Greg Bell 10/25/18
Greg Bell, Chair
Board of Trustees

ATTEST:

Robert K. Biles
Robert K. Biles, Secretary/Treasurer

(Corporate Seal)



CERTIFICATE

The undersigned duly qualified Chair of the Board of Trustees of the Utah Transit Authority certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Board of Trustees held on the 25^h day of October, 2018.



Greg Bell, Chair
Board of Trustees



Robert K. Biles, Secretary/Treasurer

Approved As To Form:



Legal Counsel

Exhibit A



Title VI Service Equity Analysis

December 2018

Utah Transit Authority

Prepared by: Andrew Gray

Graphics and Data: Joseph Tavlör

Attachment J: Page 191

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Utah Transit Authority has committed to the Federal Transit Administration's (FTA) Title VI objectives set forth in Circular 4702.1B by ensuring that UTA's services are equitably offered and resources distributed without regard to race, color, or national origin.

The following analysis is of proposed changes to be implemented in December of 2018. These changes are being proposed to best utilize public funds and improve services and the functionality of the system. Though the proposed changes are facially neutral, this analysis, in accordance with FTA requirements, will ensure that these changes will not have disproportionately negative impact on minority and/or low-income populations within UTA's service area. If these changes are found to be discriminatory, UTA will take all prescribed and prudent steps to ensure services are equitable and compliant with federal guidelines and requirements.

Summary of Proposed Changes

Addition of Service – Route F605:

It is proposed to add a flex route in Davis County. The proposed new route would serve locations throughout Woods Cross, West Bountiful, Bountiful and Centerville with limited stops at the Woods Cross Station which is a Commuter Rail and Bus station. The flex route would also provide deviation services within a three quarter mile radius of the route. The addition of service constitutes a major change in accordance with UTA policy and requires a Title VI analysis.

UTA Policy and Definitions

UTA has developed corporate policy 1.1.28 Title VI Compliance Policy to define and evaluate the impacts of proposed major services changes on minority and low-income populations in conjunction with a public outreach process. In developing this policy, UTA solicited feedback through newspapers within the service area, published on UTA's website (rideuta.com), and Utah's government website in the public notices section (Utah.gov) which provides translation options. In conjunction with the Salt Lake County Office of Diversity Affairs, which maintains an email list of local entities and individuals with interest in diversity issues, UTA sent an email notification soliciting feedback in the development of this policy. Additional targeted outreach was done, which included mailing a letter and the policy or sending emails to community organizations that work with minority or low-income populations.

The following references to policy are from subsections of corporate policy 1.1.28 and were created to ensure that all equity analyses are performed using the same parameters and are in line with FTA Circular 4702.1B.

Definitions

- A. *"Disparate Impact"* refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- B. *"Disproportionate Burden"* refers to a neutral policy or practice that disproportionately affects the low-income population more than non-low-income populations.
- C. *"Low-income Population"* refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/ transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.
- D. *"Minority Person"* include the following:
 - 1. American Indian or Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 - 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia,

China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
 5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- E. "Minority Population" means any readily identifiable group of minority persons who live in geographic proximity.
- F. "National Origin" means the particular nation in which a person was born, or where the person's parents or ancestors were born.
- G. "System Average" The system average is the averages of minorities and low-income persons within the total populous of the geographic regions UTA serves. The present system averages are expressed below in tabular format using 2011-2015 5-year population estimates provided by the American Community Survey (ACS).

<i>Low-Income System Average:</i>	
Population:	2,243,746
Low-Income Population:	457,949
Percent Low-income:	20.4%

<i>Minority System Average:</i>	
Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Major Service Change

UTA will consider the following types of changes to be "major changes", which require public input and a Title VI equity analysis in compliance with FTA's Circular 4702.1B

- a) The Addition of Service;
- b) A proposed service level reduction in miles, hours, or trips of thirty three percent (33%) or more of any route;
- c) The elimination of all service during a time period (peak, midday, evening, Saturday, or Sunday);
- d) A proposed twenty-five (25%) or greater change in route alignment;
- e) A proposed fare change.

Evaluation and Analysis of Service and Fare Changes

1. UTA will analyze proposed major changes to service and any proposed fare changes in accordance with FTA's Circular C 4702.1B as amended.

2. UTA will evaluate the impacts of all major service changes cumulatively when there is more than one route being affected for a service change period
3. UTA will primarily utilize American Community Survey (ACS) Data, block group data and/or ridership data to evaluate and analyze any proposed major service and fare changes. This data will be analyzed with Geographic Information System (GIS) software.
4. UTA will rely on population data and use the smallest geographic area that reasonably has access to the stop or station effected by the proposed major service change. This will be translated into a one-quarter mile radius to a bus stop, one-half mile to a light rail station and three miles to a commuter rail station.

Disparate Impact and Disproportionate Burden

1. UTA will measure the burdens of service and fare changes on minority riders to determine when minority riders are bearing a disparate impact from the change between the existing service or fare and the proposed service or fare.
2. UTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service or fare and the proposed service or fare.
3. A threshold of 5% will be used to determine disparate impact on minority populations and disproportionate burden on low-income populations. This 5% is based on the margin of error from the US Census data that UTA uses to determine the populations in the service area. This means that if the burden of the service or fare change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, then the change will be considered either a disparate impact or a disproportionate burden.

Finding a Disparate Impact

1. At the conclusion of UTA's Analysis, if UTA finds a disparate impact on the basis of race, color, or national origin, UTA shall seek to modify the proposed changes in a way that will mitigate the adverse effects that are disproportionately borne by minorities. Modifications made to the proposed changes must be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts.
2. If UTA chooses not to alter the proposed services changes despite the potential disparate impact on minority populations, or if UTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service or fare change, UTA may implement the change only if:

- a. UTA has substantial legitimate justification for the proposed change; and
- b. UTA can show that there are no alternatives that would have a less disparate impact on the minority riders but would still accomplish the transit provider's legitimate program goals. In order to show this, UTA must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative

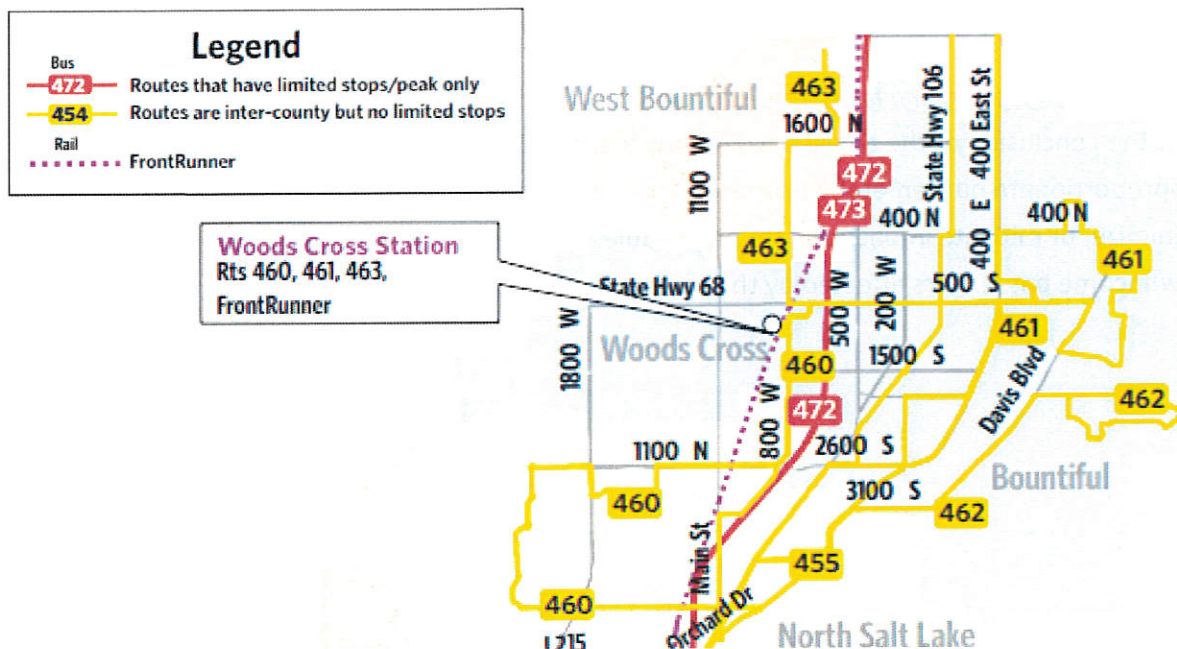
Finding a Disproportionate Burden

If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. UTA will also describe alternatives available to low-income passengers affected by the service changes.

Proposed Changes

Route F605

Current service levels in the Bountiful and Woods Cross areas are limited to inter-county and peak-only routes, which do not provide many local transit options. The proposed addition of a flex route in this service area will add local service. Regional service levels are depicted below.



The F605 will provide a connection from the Lakeview Hospital in Bountiful and up north through Centerville and West Bountiful and select trips to the Woods Cross Station. The route will follow a set route with designated stops as illustrated in the maps included in the analysis portion of this report. The stops will have an approximate schedule as the proposed route has been designated as a flex route. Flex routes are a unique service type in that residents can use the planned, fixed route or they can call to schedule the bus to pick them up or drop them off anywhere within a three quarter $\frac{3}{4}$ mile radius around the fixed route. These scheduled deviation requests are on a first-come, first-served basis and a bus may deviate up to two times each trip with restrictions. Due to the potential of deviations, the fixed route schedule time points may be adjusted 10-15 minutes after the listed time points. The bus, however, will not pass by a time point earlier than scheduled. The fare for standard service at the designated stops is the same as any other bus option. However, the fare for a scheduled deviation is the standard fare *plus* \$1.25. The deviation fare covers both a pick-up and a drop-off deviation for one ride.

Analysis of Proposed Changes

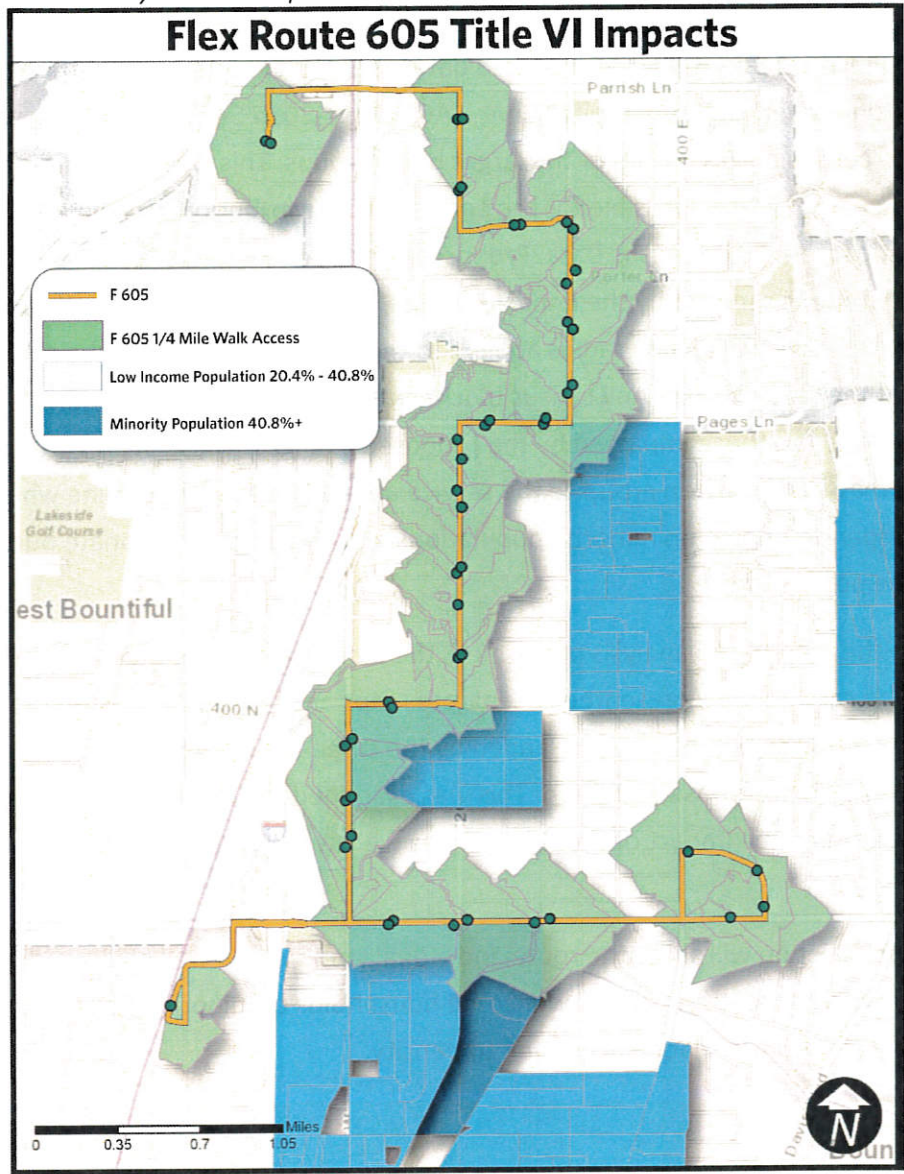
UTA is required to analyze the potential impacts of any major service change as it relates to low-income populations and minority populations. Pursuant to this requirement, UTA has created the following maps, tables and related data. The demographic data in this section was compiled utilizing American Community Survey (ACS) 2011-2015 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups. This was done in order to use the smallest geographic area possible for the analysis. The distribution was dictated by population ratios from 2010 Census Data. Proposed service changes were analyzed based on the stops and stations serviced by the impacted route. All bus stop and station locations have had a one quarter mile walkability radius applied to them which is based on the actual accessibility of the stop by road. Any census block that is overlapped by this radius has its population included as those impacted by the proposed changes. These aggregated numbers were compiled as a comparison group to the service area average to determine whether there would be a disparate impact on minority populations and/or a disproportionate burden borne by low-income populations.

In addition to the stop-based analysis performed, the flex route's three quarter mile radius is applied and the catchment is presented in separate maps and tables. The demographics of those that are within census blocks overlapped by the three quarter mile radius are considered those impacted by the proposed addition. This was examined and compared to the system average to determine the impact of the deviation as well as the fixed route described previously.

The maps in this section will show the route, individual stops with a walkability radius, and census blocks with concentrations of low-income households or minority individuals above the system average, which are shaded according to density.

Route F605

Low-Income Analysis – Stop Based

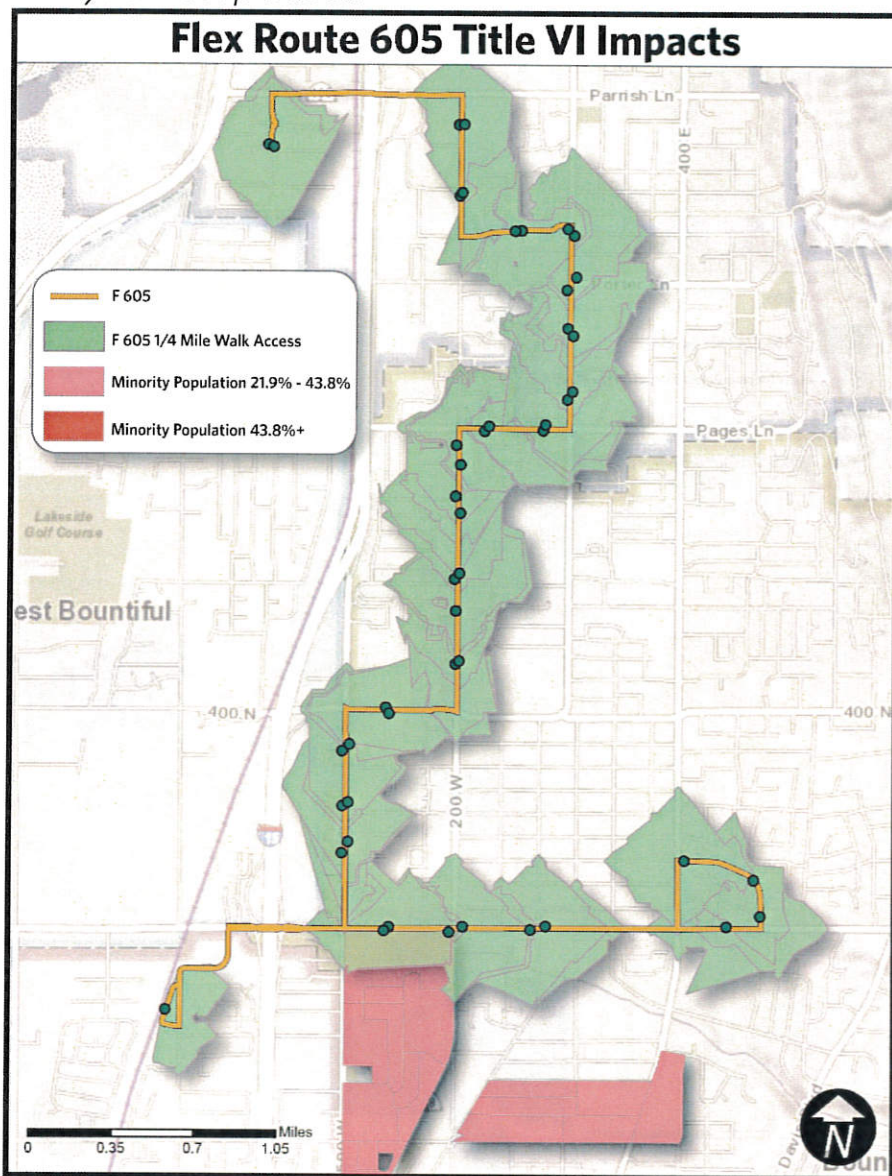


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Impacted Population – Low Income	
Total Population:	13,345
Low-income Population:	2,071
Percent low-income:	15.4% (5%)

As expressed in the table and figure above, the low-income populations with a one quarter mile walk access to the new flex route 605’s stops is 5% lower than the system average.

Minority Analysis – Stop Based

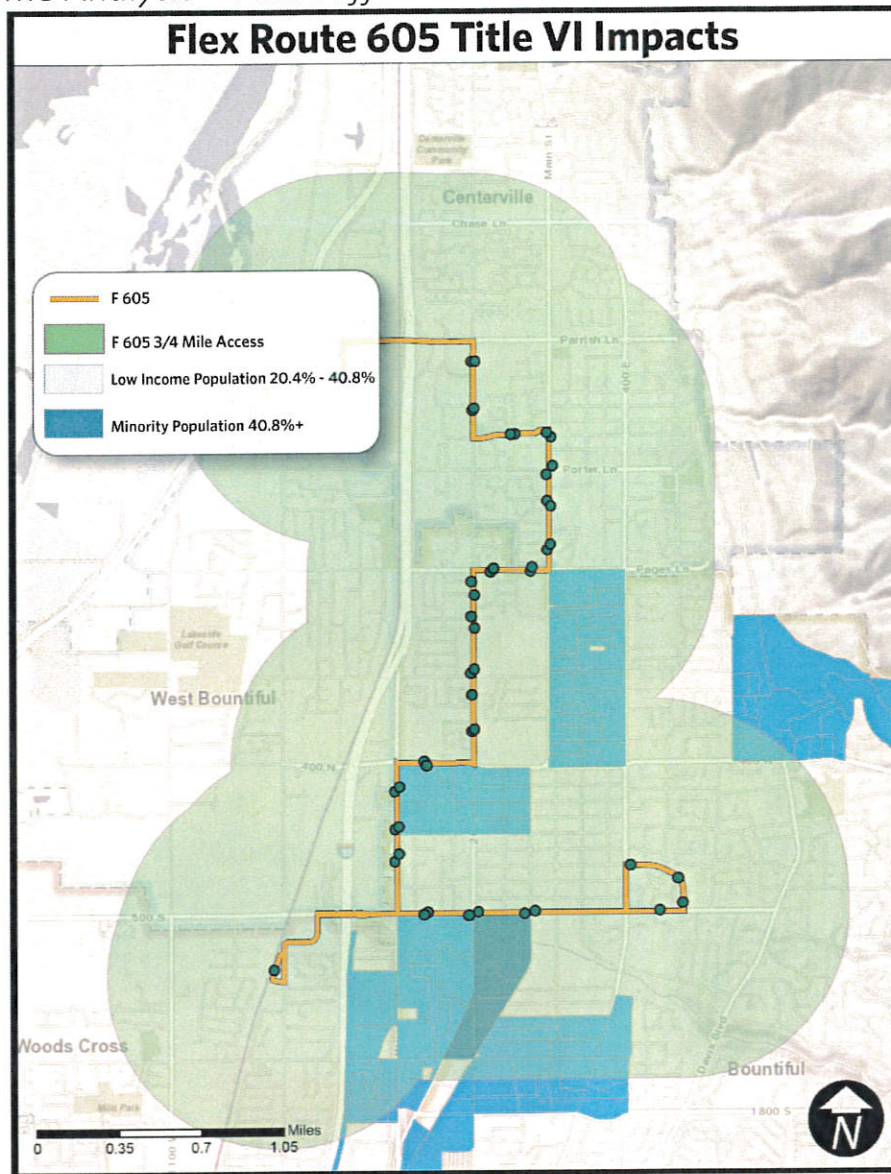


Minority System Average	
Total Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Impacted Population – Minority	
Total Population:	13,700
Minority Population:	1,529
Percent Minority:	11.2% (10.7%)

As expressed in the table and figure above, the minority populations with a one quarter mile walk access to the new flex route 605’s stops is 10.7% below the system average.

Low-Income Analysis – Flex Buffer

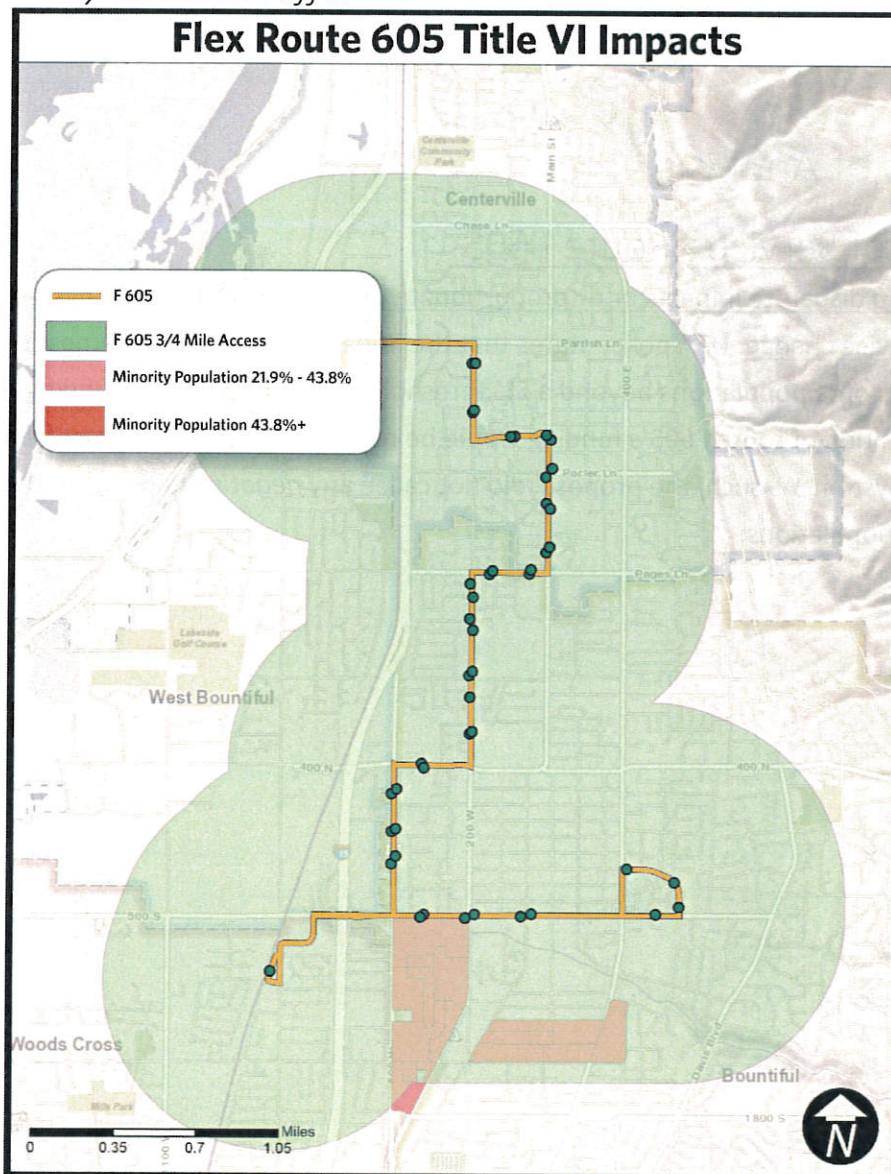


Low-income System Average	
Total Population:	2,243,746
Low-income Population:	457,949
Percent low-income:	20.4%

Impacted Population – Low Income	
Total Population:	43,710
Low-income Population:	6,483
Percent low-income:	14.8% (5.6%)

As expressed in the table and figure above, the low-income populations with access to deviated service, according a three quarter mile radius to the new flex route 605 is 5.6% lower than the system average.

Minority Analysis – Flex Buffer



Minority System Average	
Total Population:	2,277,455
Minority Population:	499,870
Percent Minority:	21.9%

Impacted Population – Minority	
Total Population:	44,169
Minority Population:	6,483
Percent Minority:	14.8% (7.1%)

As expressed in the table and figure above, the minority populations with access to deviated service, according to a three quarter mile radius to the new flex route 605 is 7.1% lower than the system average.

Findings of Analysis

Addition of Service - Route F605:

There were no disparate impacts or disproportionate burden found in the analysis of this proposed service change. UTA policy states that the impact must negatively impact minority and/or low-income populations beyond a 5% threshold in order to trigger a finding. The proposed addition of route F605's funding would be new and would not detract from other parts of the system. As such, the proposal did not cause any *negative* impacts on the surrounding populations.

Appendix A – December 2018 Change Day Public Comment Report

Special Services Business Unit

For December 2018 Change Day, the UTA Special Service Business Unit proposed implementing a new Flex route, F605, to service the Centerville, West Bountiful, Woods Cross and Bountiful communities. Flex route buses run on a fixed route and schedule, but unlike regular bus routes, passengers can request in advance a deviation or a special stop up to $\frac{3}{4}$ of a mile from the regular route.

The route is proposed to have a fixed alignment with set time points but will deviate up to $\frac{3}{4}$ mile upon advanced request. The route is also proposed to run select trips to the Woods Cross FrontRunner station. The proposed F605 would operate weekdays from 6:00 a.m. to 9:00 p.m., with 30-minute frequency all day. No Saturday or Sunday service is proposed.

Public Comment and Outreach

In accordance with UTA policy, a public comment period was held from September 11 through October 10, 2018. Several activities were conducted during this period to inform riders and the public and obtain feedback.

- A public hearing notice was published in the Salt Lake Tribune, Ogden Standard Examiner and the Davis County Clipper. The notice was also published on the State's public notice website and on www.rideuta.com. Information on the comment period was also published on UTA's social media channels.
- One formal public open house was held on September 26, 2018 from 4:30 p.m. until 6:30 p.m. The open house was held at the Davis County Library South Branch.
- Comments were also accepted via UTA's website, email at hearingofficer@rideuta.com, through the mail and by phone.

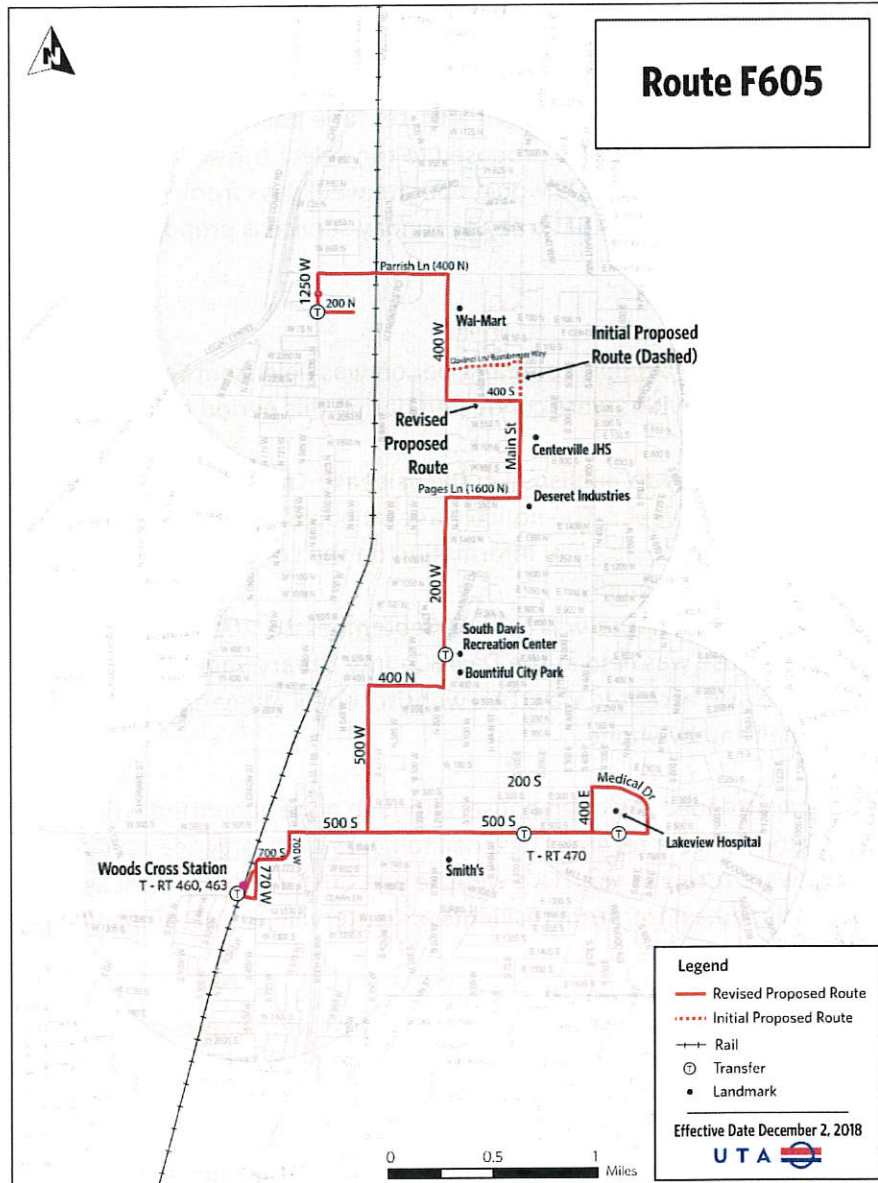
A total of three people attended the open house, although none submitted written comment. A total of eight (8) comments were received by email to hearingofficer@rideuta.com, and a total of seven (7) comments were received via UTA's website and Customer Comment system. One of the comment received included a letter from residents of Centerville city accompanied by the names and addresses of 86 residents.

Comments included support for the new route, but concerns were expressed about a section of the alignment along DaVinci Lane between Main Street and 400 West, and the proposed location for a bus stop.

Based on the feedback received and in response to residents' significant concerns about the route along DaVinci Lane, UTA is proceeding with implementing the new route in December, but planners have adjusted the alignment for the F605 to use 400 South instead of DaVinci Lane.

Appendix B – Changes to Proposed Route after Public Comment

Based on the feedback received regarding the F605, as outlined in Appendix A, UTA has integrated the comments received and has proposed a new alignment. The initial proposal proceeded up Main Street and travelled down DaVinci Lane/Bamberger Way. The new proposed alignment will not include the neighborhood road, which was the focus of much of the community's comments, but will instead use 400 South as illustrated below.



These modifications to the route alignment did not drastically impact the number of people served by the route, nor did it have any impact on the final conclusion of this analysis.