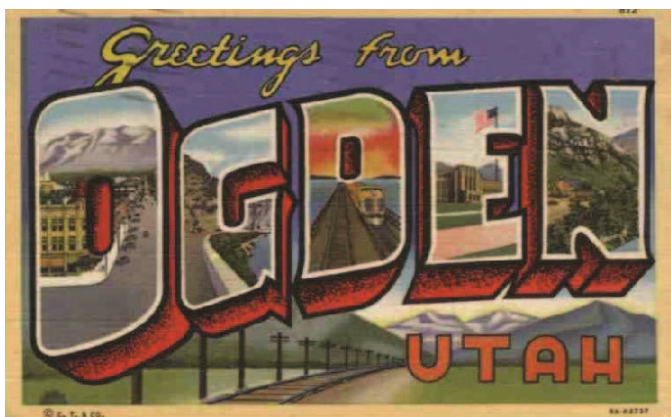


APPENDIX B3

Environmental Justice Technical Report



Environmental Justice Technical Report

Ogden/Weber State University Transit Project

Ogden, Weber County, Utah

October 10, 2018

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1.0 Introduction

This technical report describes the expected environmental justice issues for the Ogden/Weber State University Transit Project and evaluates how environmental justice populations would be affected by the Action Alternative. The Action Alternative is the Bus Rapid Transit on 25th Street Alternative, which was selected by the Ogden/Weber State University Transit Project partners and adopted by the Ogden City Council as the Locally Preferred Alternative.

Implementation of the No-Action Alternative would not result in adverse impacts to environmental justice populations. The affected environment (existing conditions) would remain unchanged from current conditions.

Project Study Area. The project study area encompasses a 5.3-mile corridor between downtown Ogden, Weber State University, and McKay-Dee Hospital. The project study area is located in the city of Ogden in Weber County, Utah. The project study area encompasses a portion of downtown central Ogden bounded by the Union Pacific Railroad line to the west, 20th Street (State Route [S.R.] 104) to the north, the city limits at the base of the Wasatch Mountains to the east, and about 4600 South to the south, the southwestern part of which follows the Ogden/South Ogden municipal boundary (Figure 1).

This project study area includes the following major destinations and Ogden neighborhood districts that could be served by the Action Alternative (Figure 2):

- The Ogden Intermodal Transit Center (FrontRunner operates frequent service from Ogden to Provo, an 88-mile route)
- Lindquist Field, a minor-league baseball stadium with an 8,262-person capacity
- The Junction, a 20-acre entertainment, residential, retail, and office mixed-use redevelopment
- The Ogden downtown central business district, which includes city, county, and federal offices
- Seven neighborhood districts: Central Business (downtown), East Central, Taylor, Jefferson, T.O. Smith, Mt. Ogden, and Southeast Ogden
- Ogden High School, with an annual enrollment of about 1,000 students in grades 10–12
- Weber State University, with about 2,500 faculty and staff and about 25,000 students (up from 17,000 in 2007), 840 of whom lived on campus as of September 2016 (Sears 2016)
- The Dee Events Center, a 12,000-seat sports and entertainment venue with a 3,000-space parking lot
- The McKay-Dee Hospital Center (at 2,300 employees, the fourth-largest hospital in Utah)

Figure 1. Project Study Area

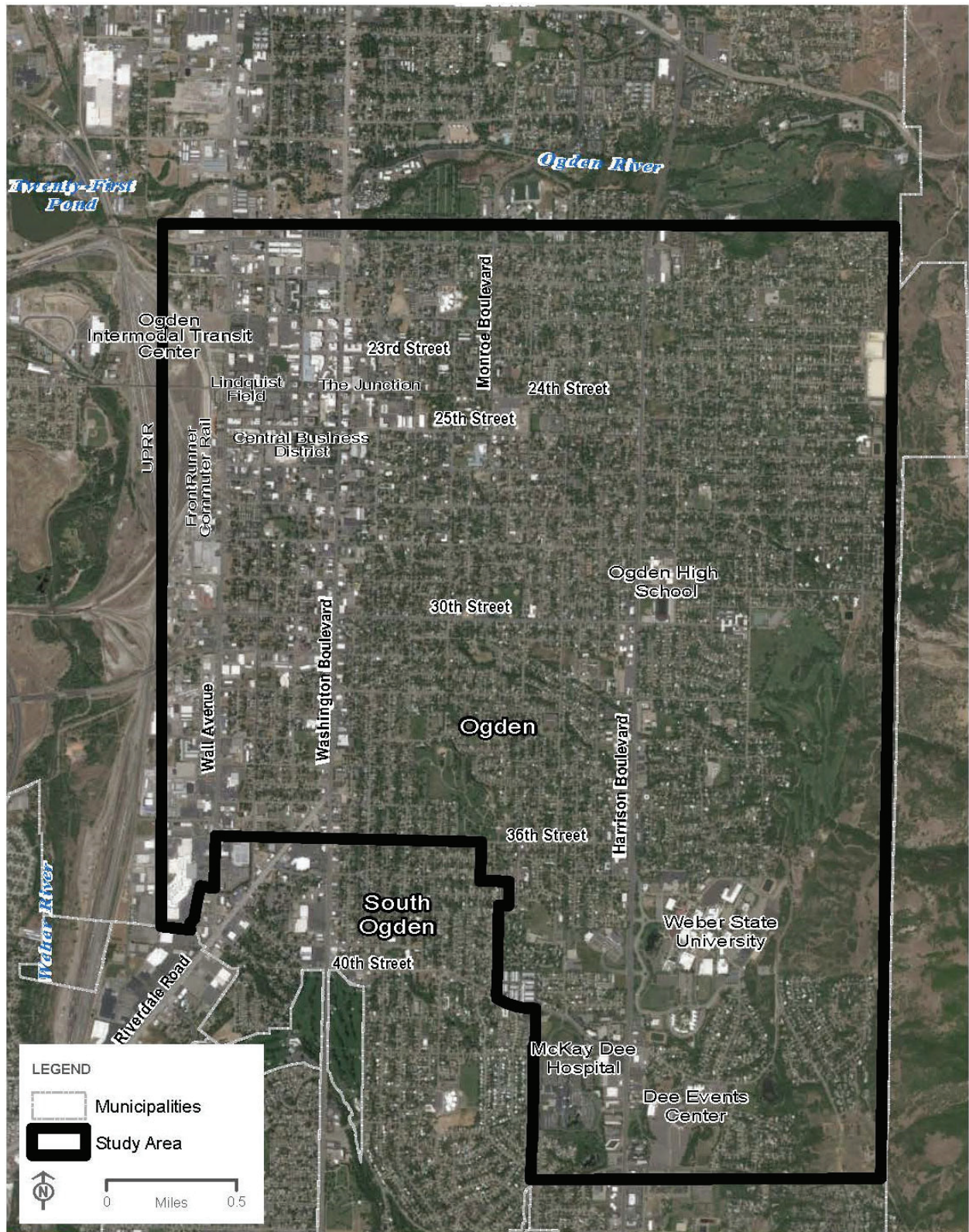
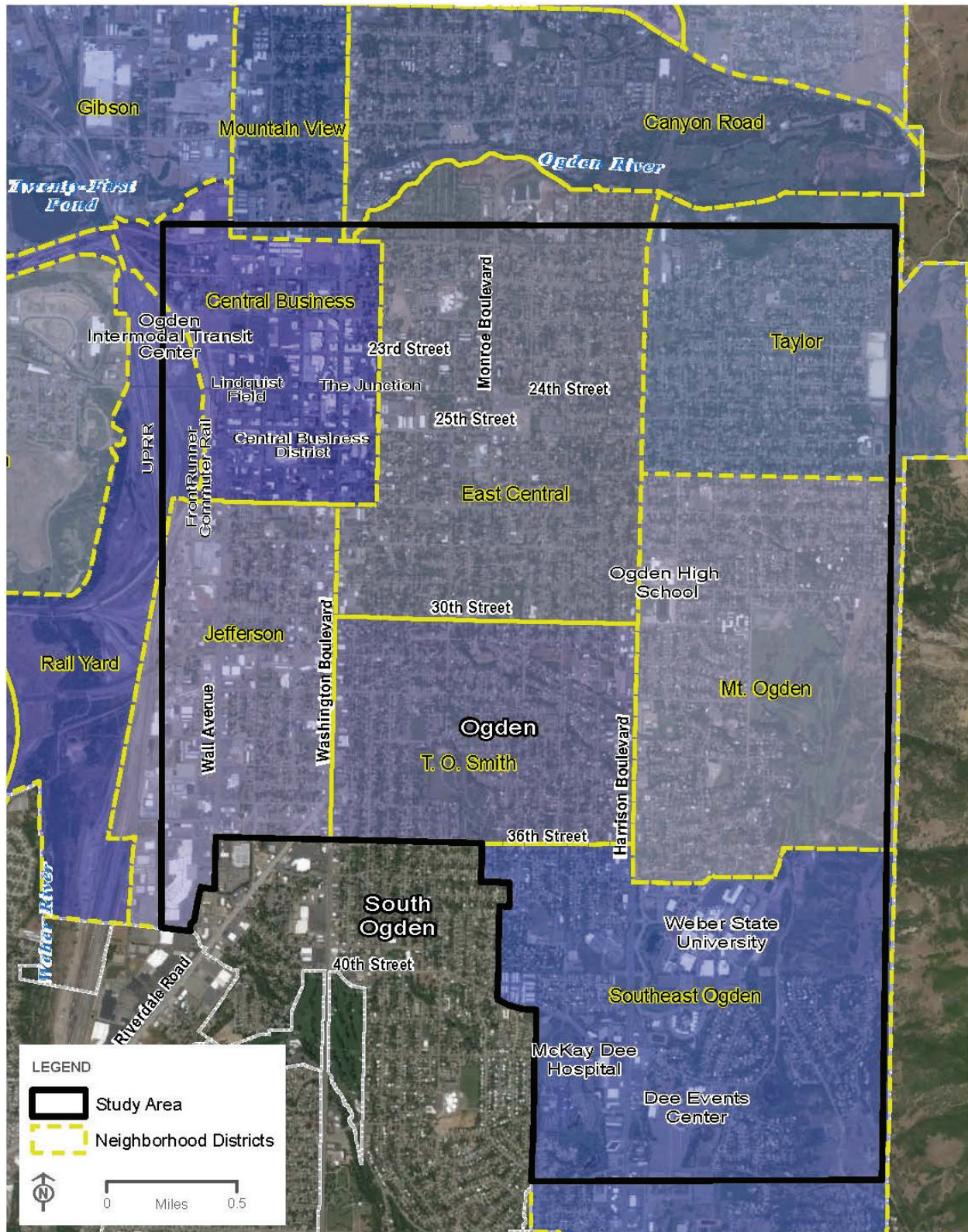


Figure 2. Neighborhood Districts



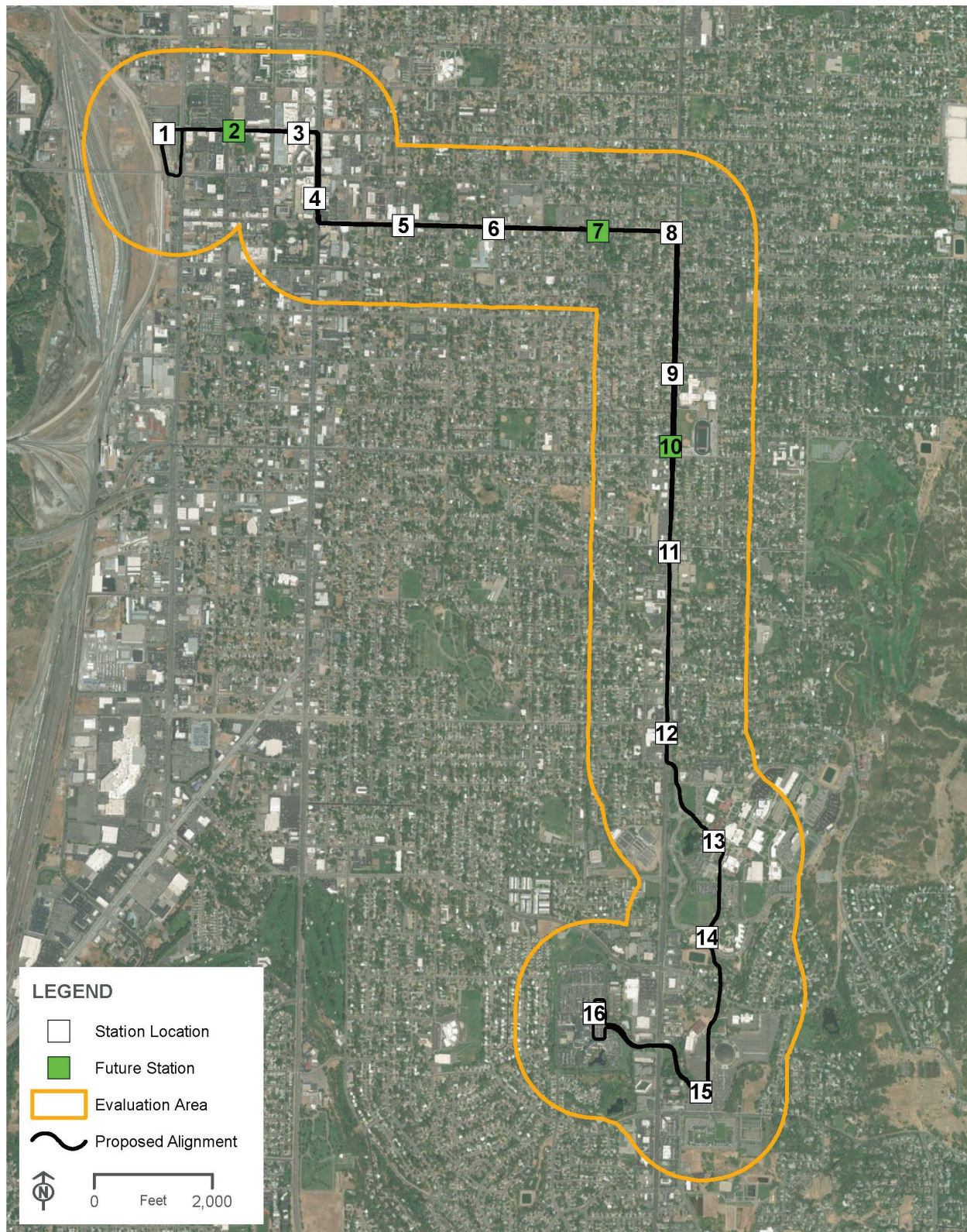
OGDEN/WEBER STATE UNIVERSITY TRANSIT PROJECT
NEIGHBORHOOD DISTRICTS



Ogden is one of the oldest communities in Utah and has a number of historic districts and neighborhoods. Much of central Ogden is served by a traditional grid street system, and a number of the major arterials are state highways managed by UDOT which serve regional travel through Ogden. These major arterials are Washington Boulevard (S.R. 89), Harrison Boulevard (S.R. 203), and 30th Street (S.R. 79). Harrison Boulevard is part of the National Highway System and is a major north-south arterial that serves an important statewide transportation function through Utah by connecting Washington Boulevard (S.R. 89), Weber State University, and 12th Street (S.R. 39). The Union Pacific Railroad (UPRR) line and the Ogden Intermodal Transit Center are on the western edge of the city, and Interstate 15 is just west of the city.

Environmental Justice Evaluation Area. The environmental justice evaluation area is the area within one-quarter mile of each side of the edge or the Action Alternative footprint (Figure 3).

Figure 3. Environmental Justice Evaluation Area



OGDEN/WEBER STATE UNIVERSITY TRANSIT PROJECT
ENVIRONMENTAL JUSTICE EVALUATION AREA



2.0 Project Description

The Federal Transit Administration (FTA) and the Utah Transit Authority (UTA), in cooperation with project partners Ogden City, Weber County, the Wasatch Front Regional Council (WFRC), UDOT, Weber State University, and McKay-Dee Hospital, have prepared an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA; 42 United States Code §§ 4321–4347) for the Ogden/Weber State University Transit Project.

The proposed transit corridor is the alignment of the Action Alternative (Figure 4). The bus rapid transit (BRT) route for the Action Alternative would be about 5.3 miles long (10.6 miles round trip), with a western terminus at the Ogden Intermodal Transit Center. From there, the BRT route would head east in mixed-flow traffic on 23rd Street to Washington Boulevard, south on Washington Boulevard to 25th Street, east on 25th Street to Harrison Boulevard, and south on Harrison Boulevard. At about 31st Street and Harrison Boulevard, the BRT route would transition to center-running, bus-only lanes. It would continue on a dedicated busway through the Weber State University campus and then travel west to McKay-Dee Hospital, where it would again travel in mixed-flow traffic. The BRT route would loop back on the same route.

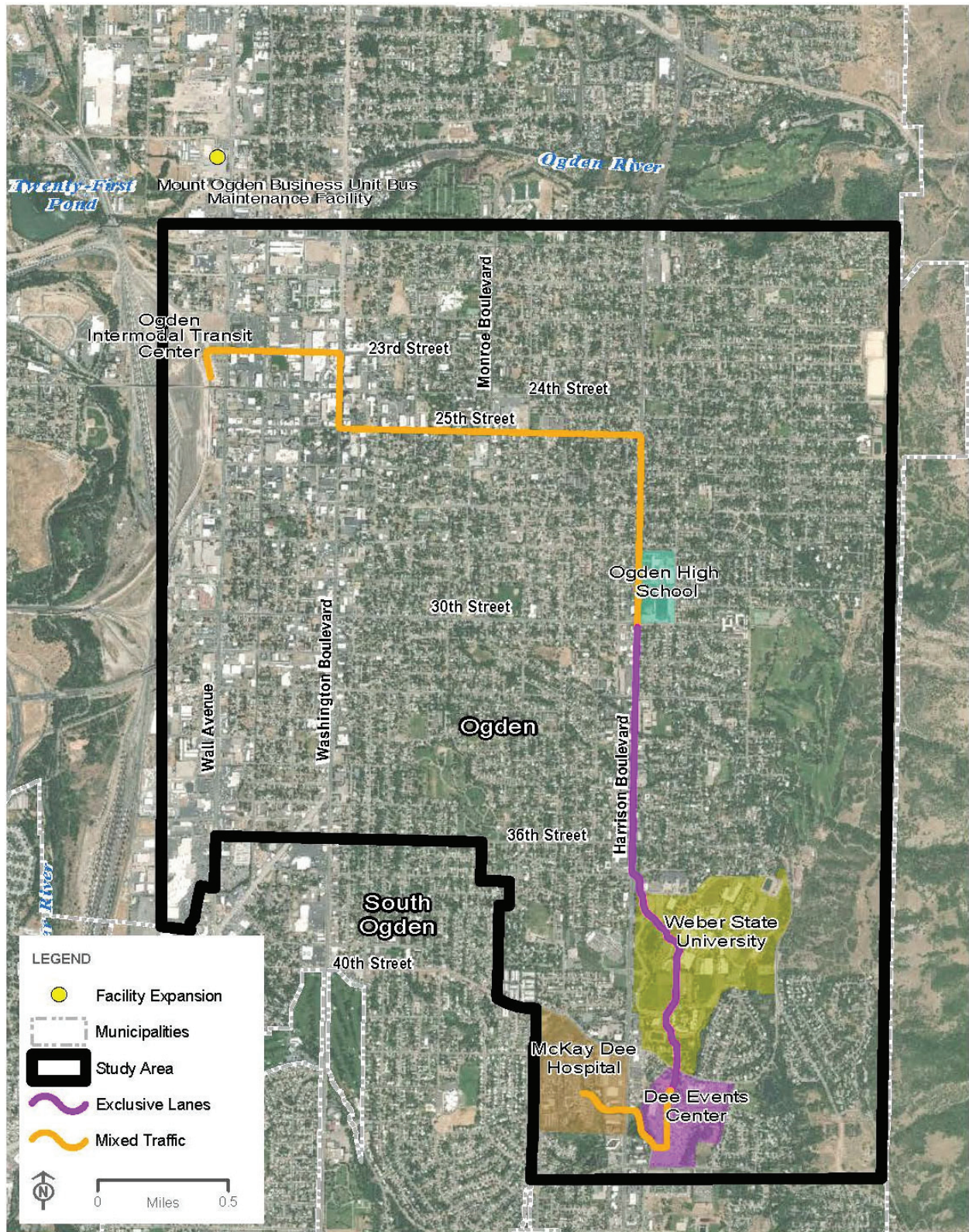
Station Locations. The Action Alternative includes 16 brand-identified stations. The station locations were chosen during the project’s Alternatives Analysis update process. Station spacing ranges from about 0.25 mile apart to about 0.50 mile apart; several stations on Harrison Boulevard would be farther apart because of the spacing of major destinations.

Of the proposed 16 stations, 11 are existing bus route 603 stations (including the termini at the Ogden Intermodal Transit Center and McKay-Dee Hospital) that would be enhanced as part of the Action Alternative. The project team agreed that not all 16 stations would be constructed for the BRT service’s opening day (2020). Three of the 16 stations are designated as future stop locations. The existing route 603 bus currently stops at two of these three locations, and those locations would be discontinued and new enhanced stations would be constructed in their place in the future based on ridership and station demand.

Station Amenities. The Action Alternative stations would include a platform, canopy, landscaped planter, and station amenities. The station would sit on a concrete bus pad elevated above the sidewalk curb height between 6 and 9 inches above the street grade. Stations would be about 125 feet long, with a platform length of 100 feet to accommodate two 40-foot-long BRT vehicles. Station shelters would be roughly comparable in size to existing UTA bus passenger shelters in the area, though somewhat longer.

At present, UTA anticipates that the shelters would be designed to include a combination of glass panels and solid support members that would have a minimal visual “footprint.” Station canopies would be opaque features that provide shelter from sun and rain and would be about 10 to 15 feet high, depending on the incorporation of decorative architectural features that would be determined during final design.

Figure 4. Action Alternative



OGDEN/WEBER STATE UNIVERSITY TRANSIT PROJECT
ACTION ALTERNATIVE



The platform provides the area for passenger waiting, boarding, and station amenities. The station platform would range from 8 to 25 feet wide, depending on the station location and the need for a platform to accommodate either single-direction travel or both southbound and northbound travel. Station amenities could include ticket vending machines, seating, lighting, a canopy and wind screens, garbage receptacles, and wayfinding information (maps and signs).

Mount Ogden Business Unit Bus Maintenance Facility Expansion. In conjunction with the Action Alternative, UTA would expand the existing Mount Ogden Business Unit Bus Maintenance Facility located at 175 W. 17th Street in Ogden. The Mount Ogden facility is currently operating at maximum capacity and cannot accommodate the additional eight BRT vehicles needed for the Action Alternative. As a result, the existing Mount Ogden facility would be renovated and expanded.

Operations at the Mount Ogden facility would continue to include maintenance, repairs, inspections, and cleaning for the existing bus fleet and the additional BRT vehicles. The BRT vehicles would be maintained and stored overnight at this facility. The north maintenance building would be expanded to the east by about 8,000 square feet, remaining within property currently owned by UTA and remaining within the existing parking lot pavement area; no additional right-of-way would be required. The expansion would consist of four new bus maintenance bays, which are covered areas for maintaining the new BRT vehicles as well as buses already in the fleet. The expansion would bring the existing facility from about 32,000 square feet to just under 40,000 square feet.

23rd Street and 25th Street Roadway Improvements. To further support the Action Alternative, Ogden City would upgrade portions of 23rd Street and 25th Street to better accommodate the Action Alternative. 25th Street would be rebuilt from the bottom up, and in certain instances, water mains would be replaced, storm sewers would be installed, and sanitary sewers would be repaired. Depending on the extent of the utility work, curbs might be fully replaced. Ogden City would also upgrade roadway infrastructure on portions of 23rd Street between Wall Avenue and Kiesel Avenue to better support the Action Alternative and active transportation (walking and bicycling). Improvements would include adding a traffic signal at Lincoln Avenue, restriping, adding bicycle lanes, adding crosswalks, reconstructing curbs, and reconfiguring parking.

3.0 Regulatory Setting and Methodology

The methodology used for the environmental justice analysis follows Executive Order (EO) 12898, U.S. Department of Transportation (DOT) Order 5610.2(a), and FTA Circular 4703.1.

Environmental justice is a term used to describe the fair and equitable treatment of minority and low-income people—which this report collectively refers to as *environmental justice populations*—with regard to federally funded projects and activities. This report describes the regulatory authority for conducting environmental justice analyses, summarizes information about minority and low-income populations in the Ogden/Weber State University Transit Project study area, and identifies potential project-related effects on those populations.

Environmental justice concerns can arise if a federal action were to result in disproportionate adverse human health or environmental effects on minority or low-income populations.

EO 12898, entitled *Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued in 1994 with the goal of achieving environmental protection for all communities. A presidential memorandum accompanying the EO directed agencies to incorporate environmental justice concerns in their NEPA processes and practices. EO 12898 states:

Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

DOT issued DOT Order 5610.2 in 1995, which states the Department’s strategy to ensure compliance with EO 12898. DOT issued an update to its environmental justice compliance strategy, DOT Order 5610.2(a), in 2012. The updated DOT order sets forth steps to prevent disproportionately high and adverse effects on minority or low-income populations and describes specific measures to address instances of disproportionately high and adverse effects.

DOT Order 5610.2(a) defines a “disproportionately high and adverse effect on minority and low-income populations” as an adverse effect that:

- 1) is predominately borne by a minority population and/or a low-income population, or
- 2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority and/or non-low-income population.

FTA Circular 4703.1, issued August 15, 2012, defines a minority or low-income population as any readily identifiable group of minority or low-income persons who live in geographic proximity. The FTA circular defines *minority* as individuals who are members of the following population groups: Black or African American, Asian, American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, or Hispanic or Latino. The FTA circular defines *low-income* as an individual whose median household income is at or below the

U.S. Department of Health and Human Services' (HHS) poverty guidelines. In 2016, the poverty guideline for a family of four was \$24,300 (HHS 2016a).

Based on guidance provided in FTA Circular 4703.1 for undertaking an environmental justice analysis under NEPA, the environmental justice analysis for this project (the Ogden/Weber State University Transit Project) includes the following components:

1. Identify minority and low-income populations in the project study area that would be affected by the Action Alternative. These populations are identified based on demographic data from the U.S. Census Bureau's 2010 Census (U.S. Census Bureau 2010) and 2011–2015 American Community Survey 5-Year Estimates (U.S. Census Bureau 2015).
2. Discuss all expected adverse effects of the Action Alternative on the identified minority and low-income populations, including all reasonably foreseeable social, economic, and environmental effects of the Action Alternative during and after construction.
3. Discuss all expected positive effects of the Action Alternative on the identified minority and low-income populations.
4. Describe actions incorporated into the Action Alternative to address adverse effects.
5. Discuss remaining effects, if any, and why further mitigation is not proposed.
6. Determine whether there would be disproportionately high and adverse effects on the identified minority and low-income populations.

4.0 Affected Environment

4.1 Results of Previous Studies

Previous studies have identified the presence of minority and low-income populations in the project study area and the environmental justice evaluation area. This section summarizes the results of those studies.

4.1.1 Wasatch Front Regional Council Regional Transportation Plan Update

WFRC is the metropolitan planning organization for the project study area. WFRC conducted extensive outreach to transportation-disadvantaged populations as part of updating its 2015–2040 Regional Transportation Plan (RTP; WFRC 2015). WFRC made individual visits to environmental justice organizations in preparation for the RTP update. At most of these meetings, WFRC staff members presented the previous RTP, which was completed in 2011, and asked about the transportation needs of the organizations' members. WFRC used the information gathered during this process as well as other demographic data to identify areas in need of transportation-system improvements that would benefit transportation-disadvantaged populations.

WFRC's outreach program included a meeting with the Ogden-Weber Community Action Program. At that meeting, program representatives commented about the affordability of UTA's transit service; the high proportion of Latino/Latina residents in Ogden; the demand and need for more affordable housing, including housing for low-income seniors; bus schedule conflicts with paratransit service (bus service for people with disabilities); and transportation to the Salt Lake City area for people with disabilities (WFRC 2015).

Because minority and low-income populations are often transit-dependent (that is, they are transit riders from zero-vehicle households) and can be transportation-disadvantaged, WFRC's process to update the RTP also identified the locations of these populations in WFRC's service area. The RTP update shows that most of the census tracts in the environmental justice evaluation area are RTP environmental justice target populations.

Using this data in its travel demand model, WFRC determined that about 22% of the riders on the Action Alternative's BRT would be those categorized as transit-dependent. About 1 in 4 households within a half-mile walking distance of the environmental justice evaluation area do not have access to an automobile and rely solely on public transportation to meet their transportation needs. Providing an accessible and affordable downtown-focused transit service with level-boarding access would better serve low-income, minority, elderly, youth, and other transit-dependent customers in the environmental justice evaluation area. The existing bus service does not have level boarding and can be challenging for people using mobility devices and strollers.

Figure 5 shows the RTP-designated environmental justice target populations in the environmental justice evaluation area (WFRC 2015).

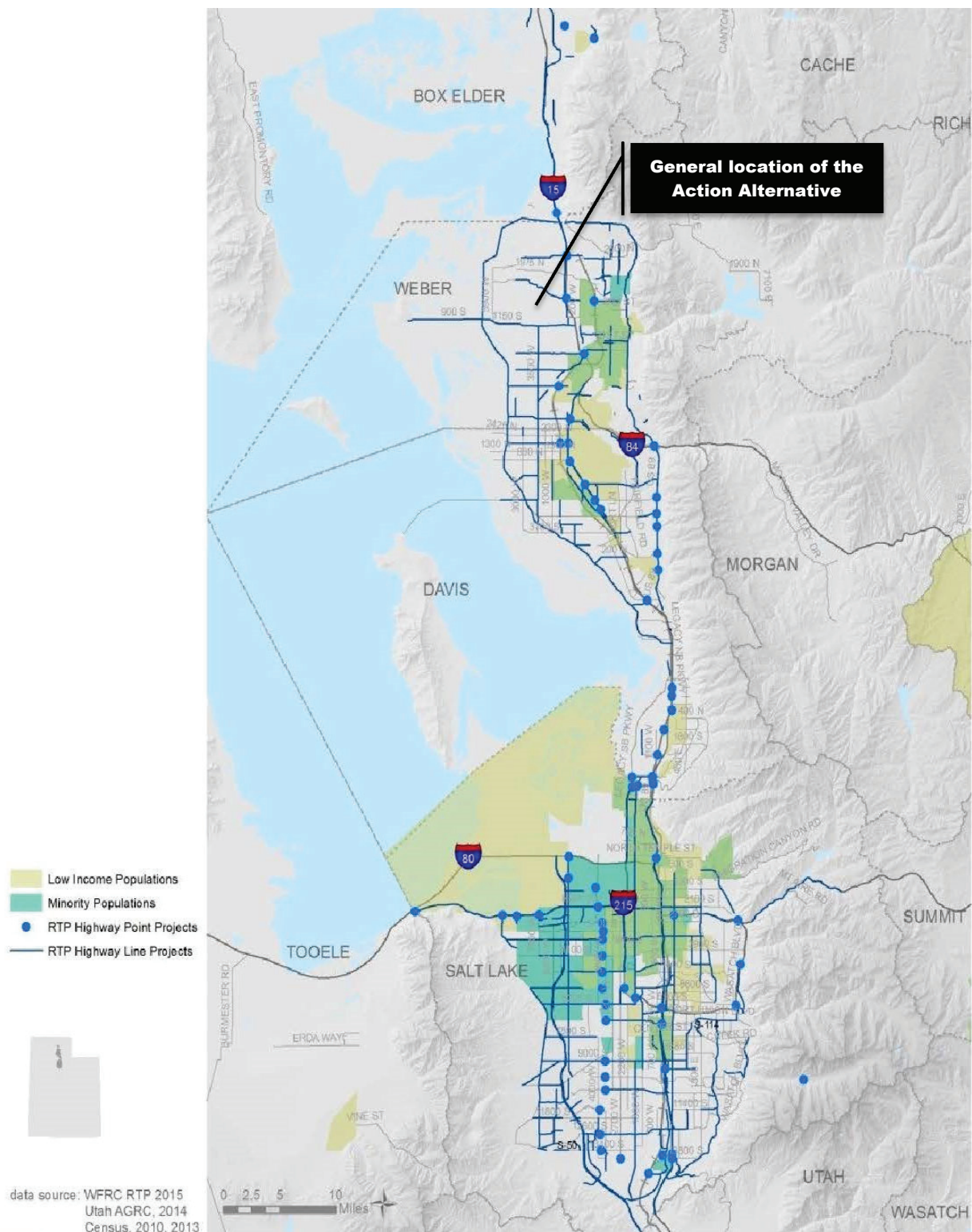
What are the environmental justice target populations considered by WFRC?

During development of the RTP, WFRC targeted low-income, minority, Native American, disabled, and elderly populations.

What is a travel demand model?

A travel demand model is a computer model that predicts the number of transportation trips (travel demand) in an area at a given time. This prediction is based on the expected population, employment, household, and land-use conditions in the area.

Figure 5. RTP-Identified Minority and Low-Income Target Populations in the Environmental Justice Evaluation Area



**OGDEN/WEBER STATE UNIVERSITY TRANSIT PROJECT
MINORITY AND LOW-INCOME TARGET POPULATIONS**

4.1.2 Weber County Housing Assessment and Plan

The Weber County Housing Assessment and Plan (housing assessment; Lotus Community Development Institute and Wood 2012) describes the housing affordability conditions for Ogden and South Ogden and provides a plan for addressing identified housing affordability challenges.

According to the housing assessment, the proportion of minorities in Ogden is 36.5% and in South Ogden is 18.6%. Compared to the countywide proportion of 21.9% minorities, Ogden has a higher proportion and South Ogden has a lower proportion of minority residents. Between 2000 and 2015, the minority population of Ogden increased at a much faster pace than the overall county population. In 2015, 1 in 2.73 people was a member of a minority group, an increase from 1 in 5 in 2000. Ogden has the largest concentration of minority individuals of any city studied in the housing assessment.

The housing assessment includes a section for Ogden. The housing assessment recognizes that Ogden has a very high share of rental units, with 42% of the total number of occupied housing units being renter-occupied (statewide, the proportion of the housing inventory is about 30%). Rental units are not disproportionately occupied by minorities (most are occupied by white people). Hispanic people occupy about 26% of the rental units, and black people occupy about 8%.

At the time of the housing assessment, Weber County reported that new homes in Ogden were affordable to moderate-income households (households that earn up to 80% of the annual area median income [AMI]) but were not affordable to low-income households (households that earn up to 50% of the AMI). The housing assessment reports that, for sales of existing homes, 9 out of 10 were affordable to moderate-income households, and just over 50% were affordable to low-income households, making Ogden one of the more affordable communities in the region.

The housing assessment shows that many of the homes sold that were affordable to low-income households were along or near the Action Alternative transit corridor. The census tract with the highest concentration of rental units and the highest proportion of minority-occupied rental units (census tract 2009) is on the north end of the Action Alternative transit corridor.

4.1.3 Ogden City Five-Year Consolidated Plan

The Ogden Community and Economic Development Department's Five-Year Consolidated Plan (Ogden City 2015) is a strategic blueprint for how the City will address housing, homelessness, special-needs populations, community development, and economic development activities for low- to moderate-income residents and neighborhoods through 2020. The process for developing the plan included extensive public outreach and coordination with other agencies. The plan is a requirement for Ogden's participation in the federal Community Development Block Grant and Home Investment Partnership programs, both of which are administered by the U.S. Department of Housing and Urban Development (HUD).

The plan also includes a detailed needs assessment. The needs assessment found that the average wage in Ogden in 2014 was \$37,325, which was slightly below the Utah statewide average wage of \$38,059. The needs assessment also found that the average wage for six of Ogden's 22 census tracts was below the statewide average wage. This difference has contributed to a significant increase in poverty in Ogden. Substandard housing is concentrated in pockets in the city where density tends to be greatest and the median income lowest. The needs assessment shows that Ogden has a substantial deficit of (and therefore a need for more) housing that is affordable for low-income and very-low-income households.

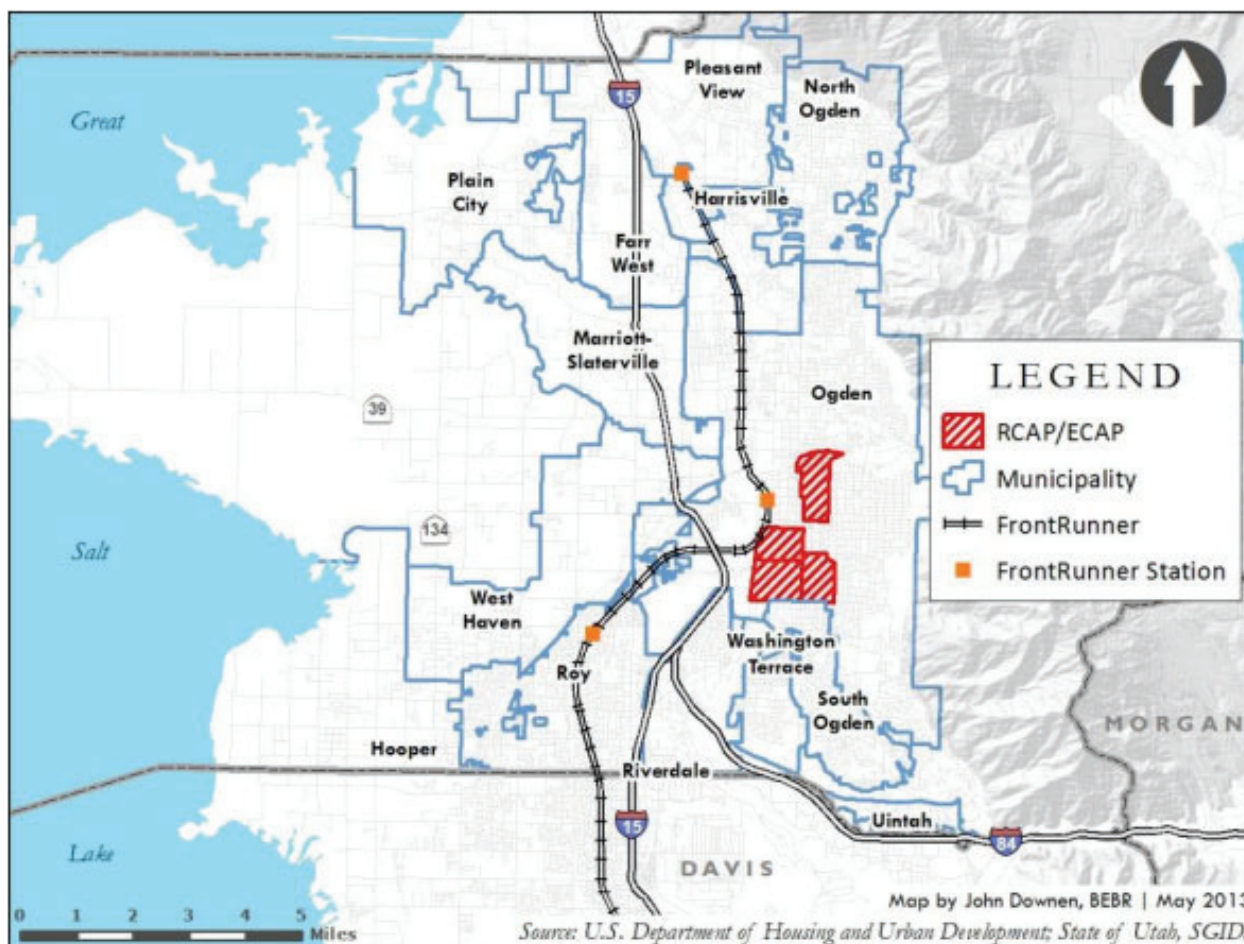
What is substandard housing?

Substandard housing is housing that does not meet local, state, or federal standards for safety and occupancy. Ogden City evaluates housing for severe overcrowding, a high cost burden relative to income, and a lack of complete plumbing or kitchen facilities.

The needs assessment further reports that, in Weber County, there are four racially/ethnically concentrated areas of poverty (RCAP/ ECAP), three of which are in the southern half of the county. HUD defines a racially/ethnically concentrated area of poverty as a census tract where (1) at least 50% of the population is non-white, non-Hispanic and (2) at least 40% of the residents live at or below the federal poverty line, or the poverty rate exceeds 3 times the average tract poverty rate within the same metropolitan area. The City's needs assessment uses the HUD definition except that it uses a measure of 3 times the average tract poverty rate within Weber County, not within the same metropolitan area.

The needs assessment found that all of the census tracts in Weber County that satisfy these two conditions are in Ogden. The consolidated plan identifies four census tracts in the project study area as RCAP/ECAP (having over 50% minorities and over 40% individuals living in poverty): census tracts 2009, 2012, 2017, and 2018. Figure 6 shows the RCAP/ECAP in the project study area, and Figure 7 on page 17 shows the locations of the census tracts.

Figure 6. Racially and Ethnically Concentrated Areas of Poverty (RCAP/ECAP) in Ogden



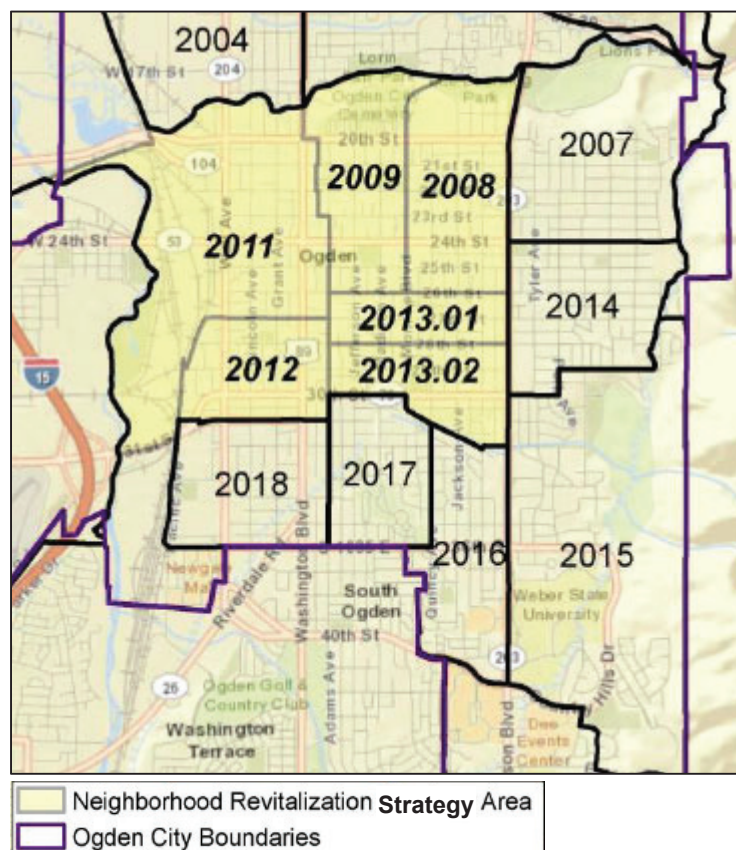
Source: Ogden City 2015

A Neighborhood Revitalization Strategy Area (NRSA) appendix to the consolidated plan focuses on much of the environmental justice evaluation area. HUD strongly encourages establishing an NRSA as a means to create communities of opportunity in distressed neighborhoods by stimulating the reinvestment of human and economic capital and by economically empowering low-income residents as part of an overall comprehensive community revitalization strategy. The NRSA is an incentive-based program created by HUD to revitalize a community's most distressed neighborhoods. Funding is provided by HUD's Community Development Block Grant funds.

The NRSA that is within the environmental justice evaluation area focuses on census tracts 2008, 2009, 2011, 2013.01, and 2013.02, as shown in Figure 7. The strategy includes income information about each of these census tracts based on 2012 American Community Survey data (U.S. Census Bureau 2015), as follows:

- **Census tract 2008:** Median family income is \$39,837 (55.6% of the AMI). 26% of the population in the census tract lives below the federal poverty line, and 4.1% of households earn less than \$10,000 annually.
- **Census tract 2009:** Median family income is \$40,503 (56% of the AMI). 37.5% of the population in the census tract lives below the federal poverty line, and 3.6% of households earn less than \$10,000 annually.
- **Census tract 2011:** Median family income is \$31,071 (42.5% of the AMI). 48.7% of the population in the census tract lives below the federal poverty line, and 2.2% of households earn less than \$10,000 annually.
- **Census tract 2013.01:** Median family income is \$46,029 (65% of the AMI). 20.4% of the population in the census tract lives below the federal poverty line, and 2.7% of households earn less than \$10,000 annually.
- **Census tract 2013.02:** Median family income is \$34,643 (48% of the AMI). 33.69% of the population in the census tract lives below the federal poverty line, and 1.9% of households earn less than \$10,000 annually.

Figure 7. Ogden Neighborhood Revitalization Strategy Area



Source: Ogden City 2015

Finally, the consolidated plan shows that most of the census tracts in the environmental justice evaluation area are low- to moderate-income. The exceptions are census tracts 2007, 2014, 2015, and 2020. The low-income census tracts identified in the RTP discussed in Section 4.1.1, Wasatch Front Regional Council Regional Transportation Plan Update, are the same as those shown in Ogden’s consolidated plan (Ogden City 2015; WFRC 2015).

4.1.4 UTA’s Title VI Review

The primary purpose of Title VI of the Civil Rights Act of 1964 is to ensure that no person, on the grounds of race, color, or national origin, is excluded from participation in, is denied the benefits of, or is otherwise subjected to discrimination by recipients of federal financial assistance programs (for this project, the recipient of federal assistance would be UTA). FTA requires recipients of federal assistance to certify their compliance with the requirements of Title VI as a part of the grant approval process. This section describes UTA’s review of the Ogden/Weber State University Transit Project to satisfy FTA’s Title VI requirements. For more information, see Appendix A, Initial Title VI Review Memorandum.

UTA’s Civil Rights Department compiled relevant demographics and determined the expected impacts to low-income and minority populations if the Action Alternative were to replace the existing bus route 603 service.

UTA Corporate Policy 1.1.28 describes the method of measuring disparate impacts on minority populations and disproportionate burdens borne by low-income populations. The threshold for determining a disparate impact or disproportionate burden is a 5% negative impact on protected populations. This means that, if the burden of the proposed change on minority or low-income populations is more than 5% worse than it is for the non-protected populations, the change is considered either a disparate impact or a disproportionate burden.

The 5% negative impact is determined by comparing the proportion of Title VI populations that currently have access to transit service to the proportion that would have access after the route(s) are changed. If either a disproportionate burden or a disparate impact is found, UTA must take steps to avoid, minimize, or mitigate impacts where practicable and must demonstrate compliance with the steps prescribed by FTA (FTA Circular 4702.1B).

Existing Route 603 Service

Route 603 runs on the route shown in Figure 8. This route runs from the Ogden Intermodal Transit Center through downtown Ogden, passes Ogden High School, passes through the Weber State University campus, and circles around McKay-Dee Hospital. It also provides Sunday service to the Ogden Clinic and locations to the south. Route 603 runs every 15 minutes on weekdays and Saturdays and runs every 30 minutes on Sundays.

Table 1 shows the demographics of minority and low-income populations who live within a quarter-mile walk of the current route 603.

Table 1. Minority and Low-Income Populations Who Live within a Quarter-Mile Walk of Route 603

Parameter	Minority	Low-Income
Total population	15,069 ^a	14,565 ^a
Title VI population	4,937	5,931
Title VI population as percentage of total population	32.7%	40.7%

Source: UTA 2018

^a The total populations are slightly different because different data sets were used for minority and low-income populations.

Service with the Action Alternative

The Action Alternative would replace route 603, following most of the existing 603 route but with two deviations. The northern portion of the BRT alignment would not travel on 26th Street like route 603 does, but it would travel on 23rd Street and pass several work and recreation locations. The second change would involve how the Action Alternative route interacts with the Weber State University campus. Instead of looping around locations north of campus, the Action Alternative would go through campus and would replace the existing campus shuttle service. The Action Alternative would also have 10-15 minute headways from 8:00 AM to 5:00 PM.

Figure 9 shows the stops on route 603 compared to the stations proposed with the Action Alternative.

Figure 8. Route 603

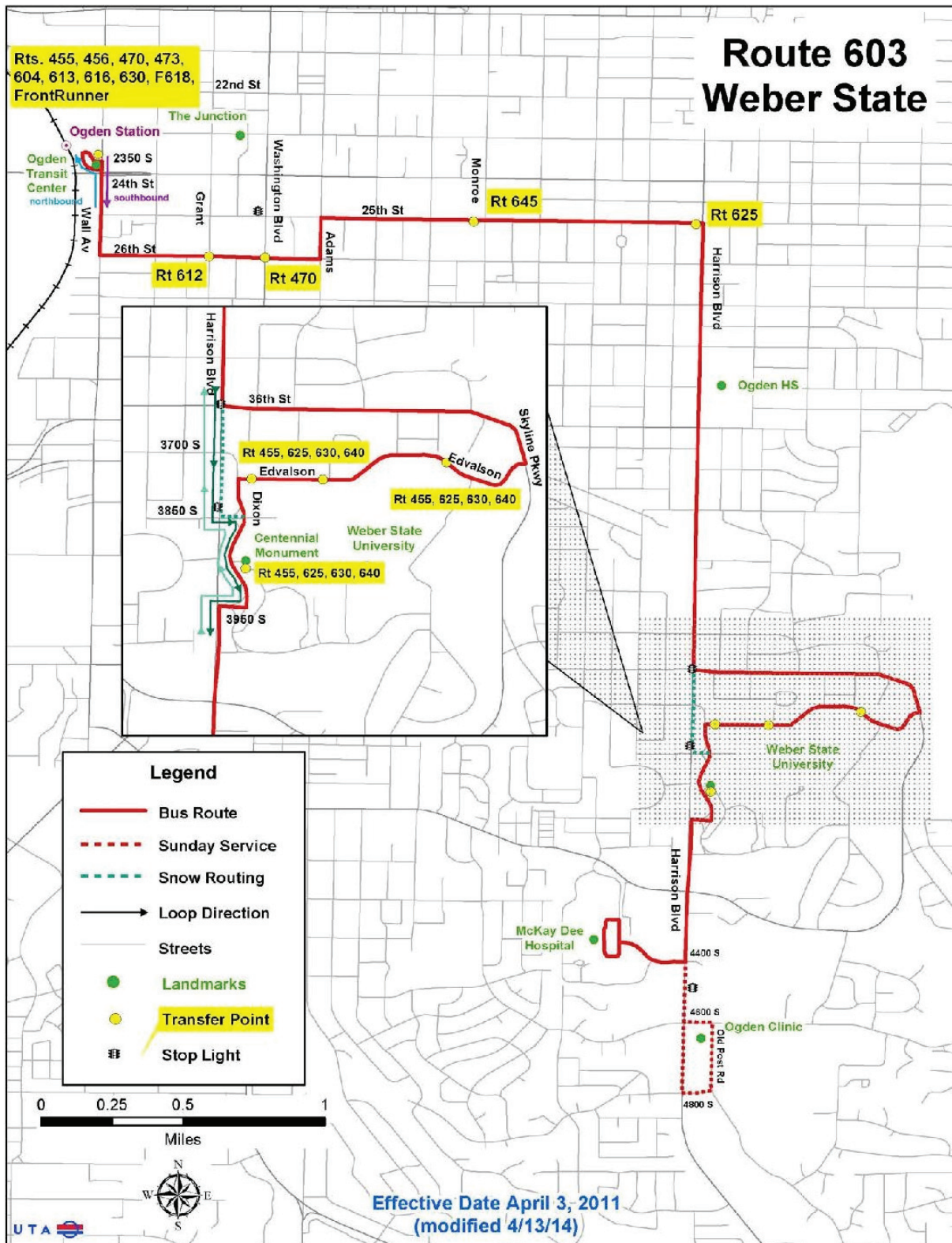
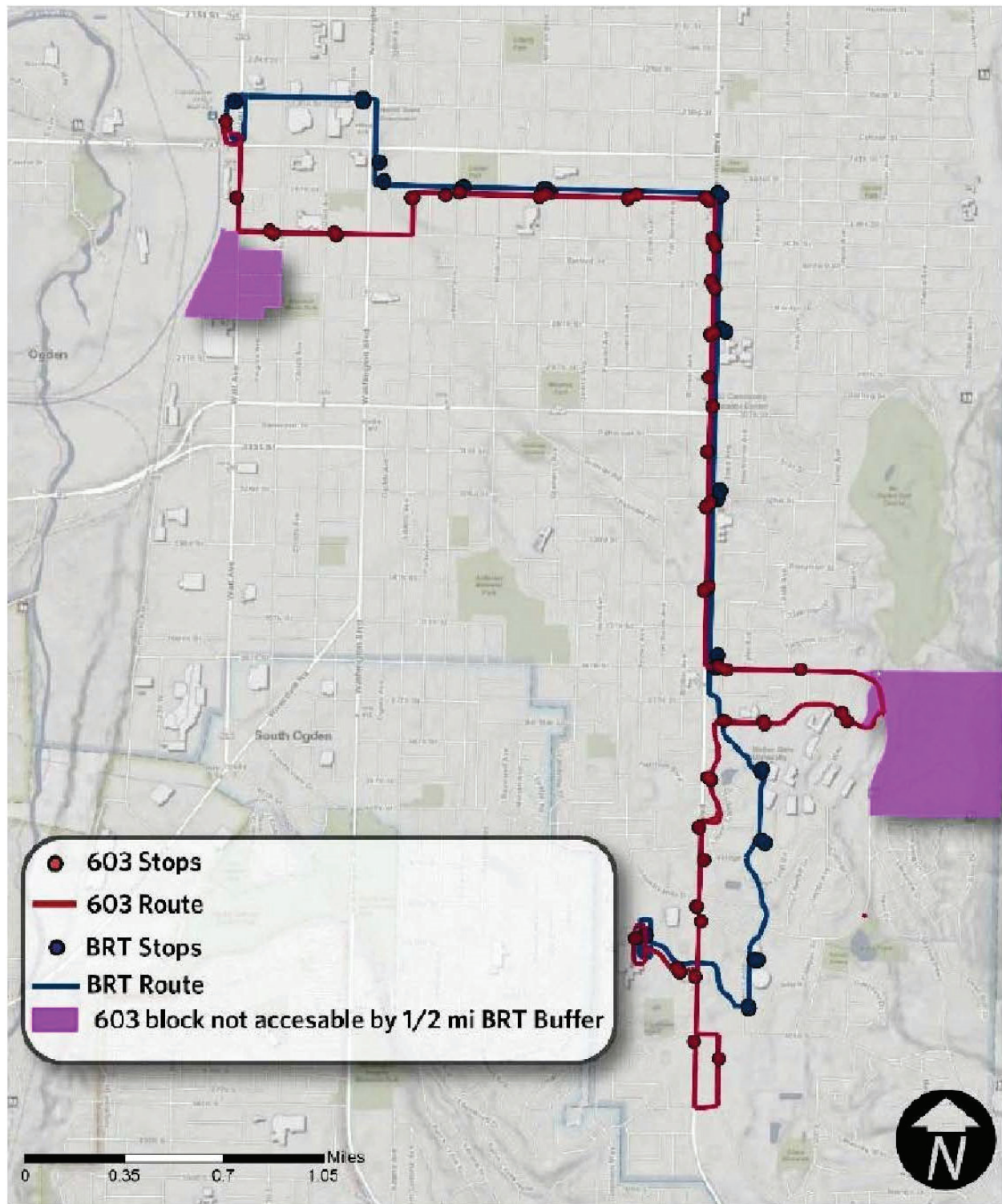


Figure 9. Route 603 Bus Stops Compared to Action Alternative Stations



OGDEN/WEBER STATE UNIVERSITY TRANSIT PROJECT
ROUTE 603 BUS STOPS AND ACTION ALTERNATIVE STATIONS

Table 2 shows the demographics of residents who live within a half mile of the Action Alternative. UTA applied a half-mile radius to the Action Alternative to account for the increased amenities and quality of service that make the Action Alternative more attractive compared to the existing bus service. The half-mile radius is based on the distance that people are generally willing to walk to access this service. As shown in Table 2, the Action Alternative would serve slightly higher percentages of minority and low-income populations than the current route 603 does.

Table 2. Minority and Low-Income Populations Living within a Half Mile of the Action Alternative

Parameter	Minority	Low-Income
Total population	24,930 ^a	24,240 ^a
Title VI population	8,817	9,937
Title VI population as percentage of total population	35.3%	40.9%

Source: UTA 2018

^a The total populations are slightly different because different data sets were used for minority and low-income populations.

Comparative Analysis of Service before and after Implementation of the Action Alternative

When comparing the service offered by the Action Alternative to the existing route 603 service, UTA took the walkability radius of the existing service, overlapped the Action Alternative stations' walkability radii, and reviewed the demographics of those excluded from the walkability radius. The change would result in 562 people losing access to the route 603 bus service. As shown in Figure 10, those 562 people would come primarily from the two areas along route 603 that would no longer be within the walkability radii of the Action Alternative.

Table 3 shows the demographics of the people who would likely lose access to the existing route 603 bus service if the Action Alternative were implemented. As shown in Table 3, about half of the population that would lose access is Title VI persons.

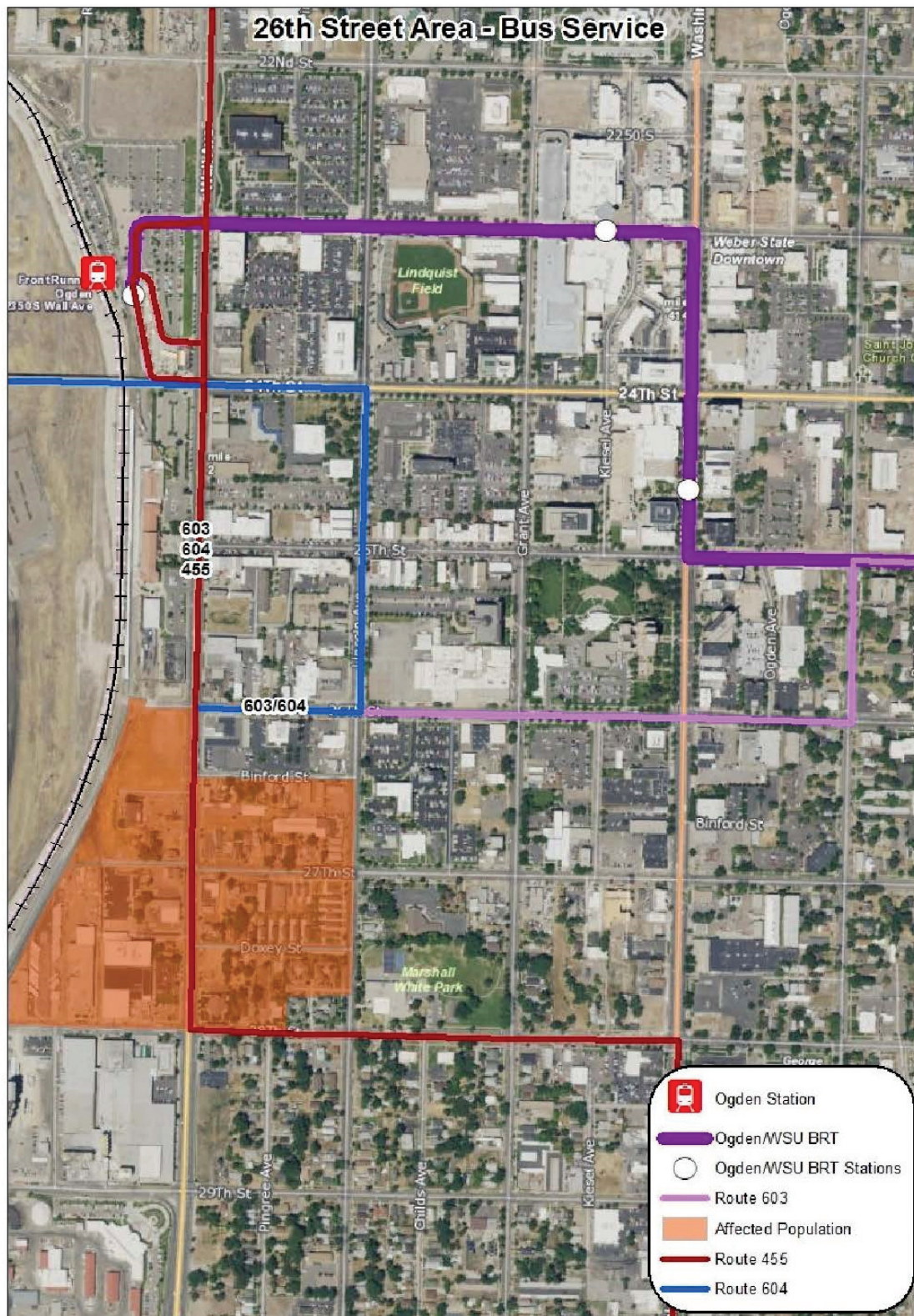
Table 3. Minority and Low-Income Populations Who Would Lose Access to the Existing Route 603 Service with the Action Alternative

Parameter	Minority	Low-Income
Total population	562 ^a	500 ^a
Title VI population	272	296
Title VI population as percentage of total population	48.4%	59.2%

Source: UTA 2018

^a The total populations are slightly different because different data sets were used for minority and low-income populations.

Figure 10. Bus Service in the 26th Street Area



However, these people would still have access to other transit service, as shown in Figure 10 above. UTA's routes 455 and 604 provide service to those who would be affected on the north end of the proposed transit corridor. Route 455 runs on Wall Avenue from 17th Street to 28th Street, providing service to the Ogden Intermodal Transit Center, and continuing south to Weber State University and Salt Lake City. Route 604 comes from Roy on 24th Street and loops to the transit center via Lincoln Avenue and 26th Street.

Several local routes (455, 625, 640, 645, and 650) would continue to run to Weber State University via Skyline Drive and Edvalson Street, providing service to those affected near the campus. In addition, the change would increase access for nearly 9,900 people, mostly as a result of the increased walkshed of the BRT. The added population would have a high percentage of low-income and minority persons as shown in Table 2 above and in Table 4 and Figure 11 below.

What is a walkshed?

A walkshed is the area that can be conveniently reached on foot from a geographic point. In the case of transit, a transit walkshed refers to the catchment area around transit service that generates walk ridership. For a high amenity transit service such as the Action Alternative, the walkshed is typically considered to be ½ mile.

Table 4. Minority Distribution in the Environmental Justice Evaluation Area by Census Tract

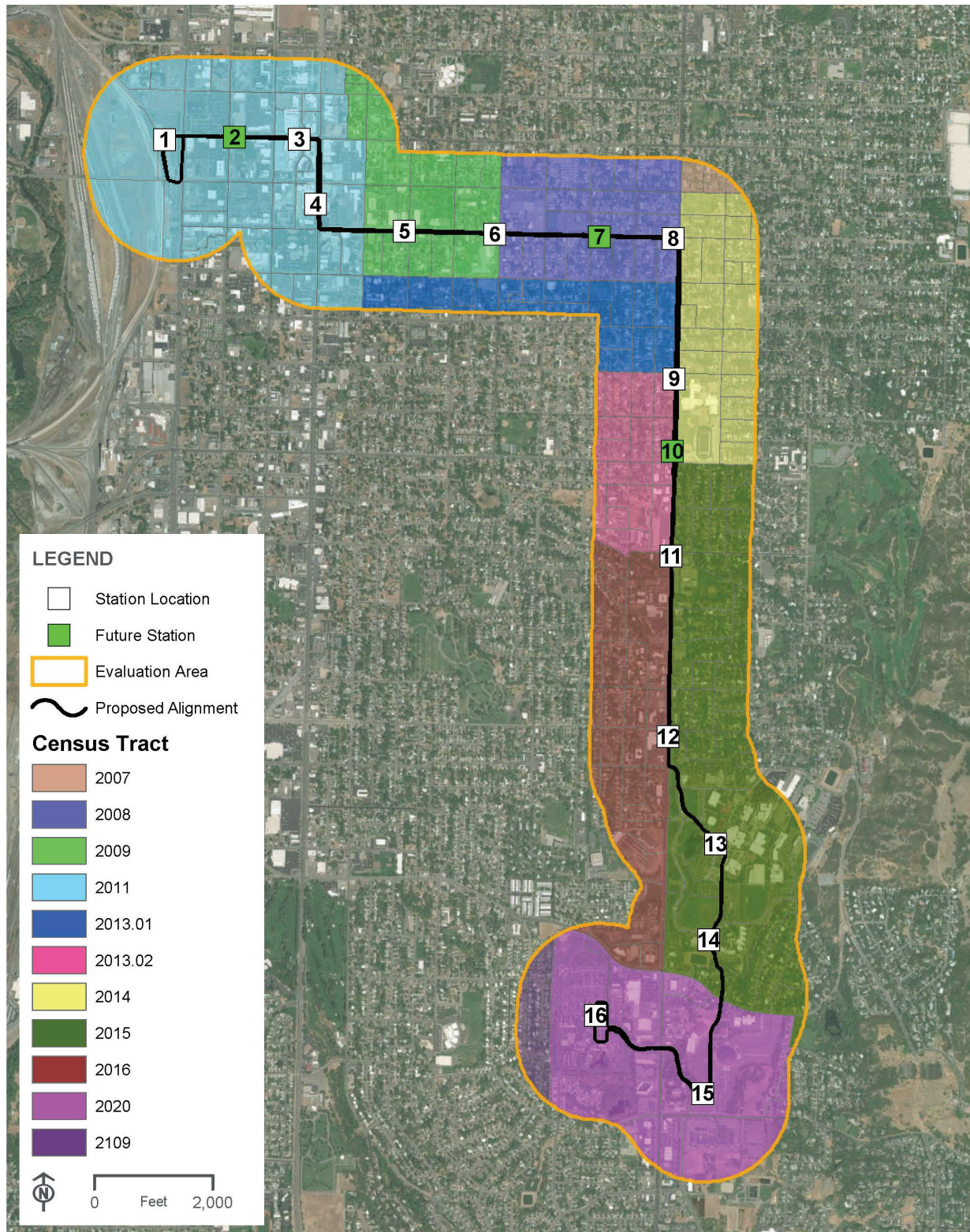
Census Tract ^a	Proportion of Minorities (percent of total population)	Difference from Ogden Proportion ^b (percentage points)	Difference from Weber County Proportion ^b (percentage points)
2007	13.7	-23.3	-9.3
2008	43.4	+6.4	+20.4
2009	56.5	+19.5	+33.5
2011	33.1	-3.9	+10.1
2013.01	46.1	+9.1	+23.1
2013.02	54.8	+17.8	+31.8
2014	20.2	-16.8	-2.8
2015	10.2	-26.8	-12.8
2016	26.0	-11.0	-3.0
2020	17.6	-19.4	-5.4
2109	17.5	-19.5	-5.5

Source: U.S. Census Bureau 2015

^a For the locations of the census tracts, see Figure 3 above.

^b For Ogden, the proportion of minorities is 37% of the total population. For Weber County, the proportion is 23% of the total population.

Figure 11. U.S. Census Bureau–defined Census Tracts Associated with the Action Alternative



Title VI Conclusion

As stated in the memorandum in Appendix A, Initial Title VI Review Memorandum, the Action Alternative could affect minority and low-income populations. However, the Action Alternative would serve slightly higher percentages of minority and low-income populations than the current route 603 does. The area of concern noted in the memorandum is well-served by other UTA service routes including routes 473, 604, 650, and 455. The memorandum is a preliminary assessment and does not include mitigation measures, which might include changing service to cover any service gaps.

UTA will consider many factors in its final analysis of this proposed change. UTA policy and FTA's Circular 4702.1B dictate the requirements that UTA would need to satisfy in order to proceed with the changes as a result of the Action Alternative. These changes will be fully vetted and elaborated on in the final analysis, but in its initial review of the proposed route, UTA identified some mitigating factors that would likely be seen by FTA as substantial legitimate justification for the proposed changes.

- The bus stops that would be eliminated are serviced by other routes that would provide connections to and from the proposed BRT line.
- The addition of service to the north provides greater connectivity to employment opportunities and recreational activities than does the existing route 603, and this service to the north might be of greater use and service to the community.
- UTA might propose additional changes to parallel and connecting service that would make up for any service gaps.
- The improvement of service and increased headways (10- to 15-minute headways) would create a better transit environment.
- The Action Alternative's half-mile walkability radius (a result of increased amenities and service) would increase the total population that has access to the proposed BRT line by nearly 9,900 people compared to those who currently have access to route 603 service. The added population has a high percentage of low-income and minority populations as shown in Table 2, Table 4, and Figure 11 above.

4.2 Environmental Justice Populations in the Environmental Justice Evaluation Area

4.2.1 Minority Populations

The FTA guidance (FTA Circular 4703.1) defines a *minority population* as any readily identifiable group of minority persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who would be similarly affected by implementation of the Action Alternative. *Minorities* include people who are American Indian or Alaskan Native; Asian; Black or African American; Hispanic or Latina/Latino; or Native Hawaiian or other Pacific Islander.

U.S. Census Bureau data provide information about the proportion of minorities in specific areas. Information about the proportion of minorities in a county or city is a good comparator when considering the proportion of minorities in a smaller study area, such as a census tract. This environmental justice technical report examines how census tract-level data about minorities compare to countywide and citywide information.

Table 5 summarizes recent American Community Survey (ACS; a U.S. Census Bureau program) data for Utah, Weber County, and Ogden.

Table 5. Minority Populations in Utah, Weber County, and Ogden

Area	Total Population	White Alone, not Hispanic or Latino/Latina	All Minorities ^a
Utah	2,903,379	2,308,090 (80%)	595,289 (20%)
Weber County	238,682	184,377 (77%)	54,305 (23%)
Ogden	84,273	53,383 (63%)	30,890 (37%)

Source: U.S. Census Bureau 2015

^a The Census Bureau collects information about race separately from information about whether a person is Hispanic or Latino/Latina. The totals in this column include all people who identify as racial minorities and all people who identify as Hispanic or Latino/Latina, regardless of race.

The ACS data show that Ogden has a higher proportion of minorities compared to the state and the county as a whole.

Census tract-level data provide a good measure of the distribution of minorities in Ogden. As described in Section 4.1.1, Wasatch Front Regional Council Regional Transportation Plan Update, WFRC identified several of the census tracts in the environmental justice evaluation area as having minority populations. The 2015 ACS data support identifying these census tracts as having significant minority populations. Table 4 and Figure 11 above show the 2015 ACS-generated proportions of minorities in the census tracts that make up the environmental justice evaluation area.

Census data indicate that Ogden is generally more racially and ethnically diverse than Weber County as a whole and than Utah as a whole. The 2015 ACS data show that census tracts 2008, 2009, 2013.01, and 2013.02 have proportions of minorities that are greater than those

for Ogden as a whole. The data presented in WFRC's RTP and Ogden City's RCAP/ECAP analysis further support the conclusion that these census tracts have minority populations. The combined information about the area east of Harrison Boulevard indicates that this area does not support substantial proportions of minorities compared to Ogden and Weber County.

The 2015 ACS data also provide information about nativity and the language spoken at home. In Ogden, about 12.9% of residents were born outside the United States, and about 23.1% speak a language other than English at home. In Weber County, about 7.3% of residents were born outside the United States, and about 13.6% speak a language other than English at home.

In summary, information on minority populations gathered by the State of Utah, WFRC, Weber County, and Ogden City correlates with U.S. Census Bureau data and confirms that there are minority populations in the environmental justice evaluation area west of Harrison Boulevard.

4.2.2 Low-Income Populations

The FTA guidance (FTA Circular 4703.1) defines a *low-income population* as any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed or transient persons who would be similarly affected by the proposed action. The guidance defines a *low-income person* as someone whose median household income is at or below the HHS poverty guidelines. The guidance encourages project proponents to consider locally developed thresholds, such as those used for FTA's grant program, or to use a percentage of median income for an area, provided that the local threshold is at least as inclusive as the HHS poverty guidelines, when conducting studies.

4.2.3 Poverty

U.S. Census Bureau data provide information about median income. According to the 2015 ACS, the 12-month median income in 2015 inflation-adjusted dollars for Ogden was \$41,036 for all households. The median income for families was a little higher, at \$47,569, and was higher still for married-couple households at \$56,169 (families are a householder and one or more other people related to the householder by birth, marriage, or adoption). Non-family households had the lowest median income at \$27,009 (U.S. Census Bureau 2015).

The HHS poverty guidelines are based on family size. The most recent information for family size in Ogden shows an average family size of 2.72 (U.S. Census Bureau 2015). The 2016 HHS poverty guideline was \$18,430 for a family of two, \$20,160 for a family of three, and \$24,300 for a family of four (HHS 2016b).

What are low-income families?

For this report, families having an annual median income of \$24,999 or less are considered to be low-income families.

According to the 2015 ACS data, 20.6% of Ogden families had a 12-month income that was \$24,999 or less (\$24,999 is the closest break point provided in the ACS data; U.S. Census Bureau 2015). The proportion of Weber County families (average family size of 3.4) with incomes below the 2016 HHS poverty threshold was much lower, at 11.9% (U.S. Census Bureau 2015). For this report, families having an annual median income of \$24,999 or less are considered to be low-income families.

Census tract-level data provide a good measure of the distribution of three- and four-person families earning \$24,999 or less in the environmental justice evaluation area. Table 6 shows the proportion of these families in the census tracts that make up the environmental justice evaluation area.

Ogden City's five-year consolidated plan lists census tracts 2009, 2012, 2017, and 2018 as RCAP/ECAPs and tracts 2008, 2009, 2011, 2012, 2013.01, and 2013.02 as part of the NRSA. The State's analysis for fair housing confirms that Ogden generally supports concentrations of low- to moderate-income housing. Weber County's housing assessment shows that census tract 2009 has the highest concentration of rental units, a measure that can indicate income status.

In summary, data on low-income populations gathered by the State of Utah, WFRC, Weber County, and Ogden City correlate with U.S. Census Bureau data and confirm that the environmental justice evaluation area has low-income populations.

Table 6. Distribution of the 12-Month Family Income of \$24,999 or Less in the Environmental Justice Evaluation Area

Census Tract ^a	Proportion of Families (percent of total population)	Difference from Ogden Proportion ^b (percentage points)	Difference from Weber County Proportion ^b (percentage points)
2007	14.5	+6.1	+2.6
2008	33.6	+13.0	+21.7
2009	36.8	+16.2	+24.9
2011	42.3	+21.7	+30.4
2012	55.6	+35.0	+43.7
2013.01	22.0	+1.4	+10.1
2013.02	26.1	+5.5	+14.2
2014	16.7	-3.9	+4.8
2015	10.1	-10.5	-1.8
2016	23.0	+2.4	+11.1
2017	18.1	-2.5	+6.2
2018	39.7	+19.1	+27.8
2020	11.5	-9.1	-0.4
2109	9.1	-11.5	-2.8

Source: U.S. Census Bureau 2015

^a For the locations of the census tracts, see Figure 3 above.

^b For Ogden, the proportion of families having an income of \$24,999 or less is 20.6% of the total population. For Weber County, the proportion is 11.9% of the total population.

4.2.4 Other Measures of Income Status

The U.S. Census Bureau measures poverty but uses poverty thresholds that are different from the HHS poverty guidelines. According to 2015 ACS data, 16.4% of families living in Ogden were living below the poverty level, while 9.4% of all Weber County families were living below the poverty level for the same period. For families with related children under 18 years of age, the poverty rates were 25.5% and 14.6% for Ogden and Weber County, respectively (U.S. Census Bureau 2015).

The census data also provide information about minorities living below the poverty level (these data also use the census-defined poverty thresholds). According to the 2015 ACS data, 33.7% of minorities in Ogden and 27.2% of minorities in Weber County were living below the poverty level. For residents who identify as Hispanic or Latina/Latino, 32.6% were living below the poverty level in Ogden, and 27.7% were living below the poverty level in Weber County (U.S. Census Bureau 2015).

The Census Bureau also collects information about employment, health insurance coverage, and supplemental assistance such as supplemental security income, cash public assistance, and food stamps. All of these factors provide information about the income status of a population. Table 7 summarizes these other measures of income for Ogden and Weber County.

Taken together, these data suggest that the population of Ogden is generally lower-income than the population in other parts of Weber County.

Table 7. Other Measures of Income Status in Weber County and Ogden

Percent of population for whom income status is determined

Location	Unemployed	Without Health Insurance	Receive Supplemental Security Income	Receive Cash Public Assistance	Received Food Stamps in the Last 12 Months
Weber County	6.3%	13.7%	5.1%	2.0%	11.8%
Ogden	8.1%	21.1%	7.3%	2.6%	19.9%

Source: U.S. Census Bureau 2015

4.3 Summary of Environmental Justice Populations in the Environmental Justice Evaluation Area

U.S. Census Bureau data show that the population of Ogden has higher proportions of minority and low-income residents than Weber County as a whole. In summary:

- The proportion of minorities is 14 percentage points higher than for the county as a whole.
- The proportion of foreign-born residents is 5.6 percentage points higher than for the county as a whole.
- The proportion of residents who speak a language other than English at home is 9.5 percentage points higher than for the county as a whole.
- The proportion of families having incomes that are \$24,999 or less (generally below the 2015 HHS-defined poverty guidelines for families of three and four people) is 8.7 percentage points higher than for the county as a whole. Income data for census tracts in the environmental justice evaluation area indicate that most tracts (5 tracts out of 15) have a higher proportion of families living in poverty than in Ogden as a whole and in Weber County as a whole.
- The proportion of families living below the poverty level, where poverty thresholds are defined by the Census Bureau as 7 percentage points higher than for the county as a whole.
- The proportion of minority residents living below the poverty level is 6.5 percentage points higher than for the county as a whole, and the proportion of the Hispanic or Latino/Latina population living below the poverty level is 5 percentage points higher than for the county as a whole.
- The proportions of residents who are unemployed, residents who do not have health insurance, and residents who receive supplemental income or assistance are higher than for the county as a whole.

Detailed census tract-level data show that most of the environmental justice evaluation area has minority and low-income populations, especially along the southern part of the Action Alternative alignment (north of about 40th Street/42nd Street/Country Hills Drive near Weber State University). Given the general minority and income conditions of Ogden and the distribution of notable environmental justice populations along the transit corridor, the impact analyses in Section 5.0, Environmental Justice Effects of the Action Alternative, consider the potential for disproportionately high and adverse effects on all minority and low-income populations in the environmental justice evaluation area as a whole.

5.0 Environmental Justice Effects of the Action Alternative

This section discusses the expected effects of the Action Alternative on environmental justice populations in the environmental justice evaluation area. Project-related effects can be beneficial as well as adverse. They can be a result of changes in social and economic conditions, air quality, noise and vibration, and safety and security and can be due to construction activities.

5.1 Methodology

The project team used a two-step approach to identify any disproportionately high or adverse effects on environmental justice populations. First, the study team determined whether the Action Alternative could change resources in a way that would affect people in the environmental justice evaluation area differently from how it might affect all populations. The main resources that are likely to affect local populations are community cohesion (the extent to which residents of a community feel connected or cohesive), economics, relocations, transportation, air quality, and noise.

Next, the project team reviewed the impact information for these resources to determine whether the impacts would exceed a law, regulation, guidance, or accepted guideline, or whether, based on their professional judgment, the impacts would have an effect, whether positive or negative, on environmental justice populations. If the project team determined that any of the previous conditions would occur, the second step was to decide whether the impact would cause a disproportionately high and adverse effect on an environmental justice population.

5.2 Outreach

As they developed the Action Alternative and analyzed its effects, UTA and its partners conducted extensive public outreach starting in June 2014. The public outreach process was structured and implemented to ensure that all relevant factors were considered, including the affected community's concerns and issues related to the project's purpose and need, alignment and engineering solutions, social impacts, environmental impacts, economic effects, financing, and other items of concern to the community.

Several methods for engagement were used to provide multiple avenues for receiving public guidance. Specific activities included meetings with key stakeholder groups, public open-house meetings, targeted engagement of the Latina/Latino community, door-to-door conversations with business owners and representatives, focus groups, a telephone survey, community and city council presentations, and online questionnaires via "Open UTA" and other web and online engagement.

A project website and Facebook account were actively maintained by UTA staff to disseminate news, information, and project materials to the wider public. The following paragraphs summarize the public involvement work done for the Alternatives Analysis update completed in 2015. More information is provided in Appendix B, Ogden/Weber State

University Transit Project Study Master Public Involvement Report, of the *Alternatives Analysis Update Report*, which is provided in Appendix A of the EA.

Outreach to Low-Income and Minority Communities. Outreach efforts included targeted engagement of the Latino/Latina community. The public process was designed to educate residents about the potential for improved transit in the area and to receive input and comments. Project staff reached out to established neighborhood groups, community leaders, Weber State University students and staff, and private organizations comprising and connected to low-income and minority communities in the project study area. UTA held five public meetings during the Alternatives Analysis update phase of the project to connect with residents, including those who might be low-income or minorities.

An open-house meeting specifically geared toward Spanish speakers was held on January 29, 2015, at James Madison Elementary School. The meeting was jointly sponsored by UTA, Ogden City, and Latinos United Promoting Education and Civic Engagement. Outreach materials were provided in both Spanish and English, and Spanish speakers were available for translation services at the meeting. Surveys were taken by Spanish-speaking students from Weber State University in an effort to better determine the needs and preferences for transit in the Latina/Latino community. A Spanish/English informative video was also created for the event.

Focus Groups. Focus groups were convened to assess the transportation needs in the target transit market and to gauge public perceptions of specific transportation modes. The target market for this study included a broad range of individuals in the project study area (Ogden) and within UTA's service area in northern Utah (Davis and Weber Counties). To accomplish the study objectives, participants were guided through a discussion that encompassed the topics and themes that included consumer habits and transit perceptions, the impact of public transit on local communities, and transit mode and alignment preferences.

Telephone Survey. A telephone survey of residents in Davis County and Salt Lake City was conducted to capture additional input regarding travel behaviors and preferences for the project study area. The survey objectives included the desire to understand and confirm regional travel patterns, modes used, and the purpose for travel; to discover whether respondents use public transportation to get to work or school and, if so, identify the modes of transit respondents typically use; discover the likelihood of respondents increasing their ridership of public transit if public transit were improved; determine the perceived impact of public transit on economic growth in Ogden; and gather demographic information such as gender, age, education, annual household income, marital status, household size, and city of residence. If a caller reached a Spanish-speaking household, the caller would have a Spanish-speaking representative call back.

5.3 No-Action Alternative

With the No-Action Alternative, the BRT and other facilities associated with the Action Alternative would not be constructed. The No-Action Alternative includes the existing transportation system and all projects in WFRC's 2015–2040 RTP that are programmed to be completed within the project study area by 2020, the anticipated opening year for the Action Alternative's BRT.

The No-Action Alternative includes current UTA route 603 bus service in the Action Alternative transit corridor using standard buses. The No-Action Alternative does not include a significant new transit capital improvement (that is, BRT and enhanced amenities associated with BRT) in the project study area by 2020. Typical UTA buses would continue serving existing bus stops in the project study area with no additional infrastructure construction.

The No-Action Alternative would not include bus-only lanes on Harrison Boulevard or through the Weber State University campus, so the reliability of transit service in the project study area would not improve. In addition, the No-Action Alternative would not include enhanced station amenities, so the lack of expedited boarding and payment systems in the project study area also would not improve. Because of delays due to traffic congestion, the existing buses would be less likely to maintain their schedule. The No-Action Alternative would not contribute to a reduction in vehicle-miles traveled and thus would not benefit the community by contributing to improved air quality and public health.

5.4 Action Alternative

5.4.1 Transit-Related Effects

The Action Alternative would not cause adverse effects on minority or low-income populations. The majority of the Action Alternative elements would be installed within the right-of-way of existing streets, and these elements would not require constructing infrastructure that would physically restrict the movement of populations. Additionally, the Action Alternative would not cause disproportionate burdens on minority or low-income populations (nor provide disproportionate benefits to non-minority or higher-income populations).

The Action Alternative would have beneficial effects for all populations, effects including additional mobility choices and improved access to the larger UTA transit system, increased access to employment and job opportunities, increased access to community facilities and other services in the project study area, improved connectivity and reliability to popular destinations, additional access to services, travel time savings, and increased opportunities for community revitalization.

In general, the service provided through transit projects benefits environmental justice populations. Improved service can provide greater opportunities for transit-dependent populations to move within and between neighborhoods, thereby enhancing access to jobs, housing, and services. The Action Alternative, which WFRC identifies as a high-priority transit project, would directly serve environmental justice populations that live along the transit corridor between the Ogden Intermodal Transit Center and Weber State University.

The corridor improvements are intended to benefit the occupants of the area and the users of the modes of transport through the corridor. Many of the people living along the route currently use the existing route 603 bus service and will continue to use the improved transit service.

WFRC and the project team considered travel time as part of the project-development process. Travel time is important for transit-dependent populations, such as low-income people who do not have cars and rely on transit to get to work. With any transit project, UTA aims to improve service reliability, reduce travel time, and improve customer experiences and service efficiency. The Action Alternative focuses on these types of improvements in a cost-effective way, and it received strong local support during the project-development process.

Changing the existing standard bus service to BRT and improving service efficiency would benefit environmental justice populations that rely on the transit system. **The transit system changes that are part of the Action Alternative would not cause disproportionately high and adverse effects on environmental justice populations.**

5.4.2 Environmental Effects

Assuming that all applicable mitigation measures identified in the other environmental technical reports for the Ogden/Weber State University Transit Project are implemented, there would be no disproportionately high and adverse effects on low-income or minority communities.

The Action Alternative would be constructed almost entirely within the existing street right-of-way along the alignment (with the exception of the new alignment through the Weber State University campus) and would require the acquisition and demolition of one commercial building on Harrison Avenue. Traffic capacity would not be reduced, and parking would be retained along most of the alignment to allow continued automobile access to local businesses. Ogden City has stated that parking on Harrison Boulevard south of 31st Street would not be allowed after the Action Alternative is implemented. The Action Alternative would replace the local 603 bus service, which would benefit transit-dependent riders. The level boarding and Americans with Disabilities Act (ADA)-compliant features at BRT stations would also enhance access to transit service for elderly riders or people with disabilities. Mobility and access would improve overall due to enhanced transit capacity and convenience.

Based on the environmental analyses conducted for the project's EA, no significant noise impacts are anticipated to occur as a result of the Action Alternative. With respect to air quality, the Ogden/Weber State University Transit Project is not anticipated to be a project of air quality concern. The Action Alternative would use newer and more-efficient buses—and possibly electric buses—which would emit less air pollutants compared to the existing buses, so no impacts to air quality are expected.

Construction activities would be minimal and temporary and would be similar throughout the Action Alternative alignment. These activities would affect all populations along the alignment, including minority and low-income populations, and would consist of repaving and restriping lanes, temporarily closing lanes and sidewalks, and placing shelters and other station features. Traffic delays would be likely during construction, and detours would be

provided to maintain access for motorists, transit riders, and pedestrians. UTA would keep community members apprised of construction schedules in readily accessible public locations as well as on the UTA website, and would seek community input when developing construction plans.

Operation of the Action Alternative would result in transportation benefits to all populations along the Action Alternative alignment, including minority and low-income populations. Benefits would take the form of faster bus service, enhanced stations, landscape and sidewalk enhancements, and associated quality of life improvements. These physical enhancements could also contribute to economic development and livability improvements. The Action Alternative and associated street enhancements could incentivize new transit-oriented development along the Action Alternative alignment, which would be consistent with zoning. BRT facilities would be designed and sited to complement the existing character of the project area neighborhoods.

Because the results of the environmental analyses completed for the project's EA have not identified any adverse effects associated with the Action Alternative, the Action Alternative is therefore not expected to result in disproportionately high and adverse effects on minority or low-income populations. Furthermore, the overall effects of the Action Alternative are expected to be beneficial, with these benefits accruing to all populations along the Action Alternative alignment, including minority and low-income populations. Based on these findings, no additional mitigation measures specific to environmental justice would be needed.

6.0 Summary

The environmental justice evaluation area for the Action Alternative supports minority and low-income populations, especially along the northern part of the Action Alternative transit corridor. WFRC and Ogden City have identified most of the environmental justice evaluation area as supporting environmental justice populations. The U.S. Census Bureau data examined by the project team and information gathered by WFRC, Ogden City, and the State of Utah confirm the presence and distribution of minority and low-income populations in the environmental justice evaluation area.

The Action Alternative would improve existing transit service and would benefit transit-dependent residents in the area, many of whom are minorities or low-income. **The Action Alternative would not cause disproportionately high and adverse effects on environmental justice populations.**

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Sears, Craig

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[UTA] Utah Transit Authority

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[WFRC] Wasatch Front Regional Council

2015 Regional Transportation Plan 2015–2040.

Appendix A. Initial Title VI Review Memorandum

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Memo

March 26, 2018

To: Hal Johnson, Todd Provost, Eddy Cumins, Ethan Ray

From: Andrew Gray

CC: Kenya Fail

RE: Ogden Bus Rapid Transit – Initial Title VI Review

In review of the potential impacts of the Ogden Bus Rapid Transit (BRT) project, the Civil Rights Department has compiled the relevant demographics for the potential changes that would be implemented and follow UTA practice and policy regarding Title VI analysis. This memo is not a complete Safe and Fare Equity (SAFE) analysis as required in FTA Circular 4702.1B, but is informational only in determining any potential impacts during the planning phase of this project. This memo is to highlight the potential impacts of the proposed changes as they relate to low-income and minority populations and our disparate impact and disproportionate burden policy.

FTA 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 will conducted a Service and Fare Equity Analysis for the Ogden BRT fixed guideway project and related changes six months prior to beginning revenue operations when the final list of proposed changes is available for analysis.

Title VI Policy

UTA Corporate Policy 1.1.28 outlines the method of measuring disparate impacts on minority populations and disproportionate burdens borne by low-income populations. The threshold for determining disparate impact or disproportionate burden is a five percent (5%) *negative impact* on protected populations. This means that if the burden of the proposed 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 disproportionate burden. The 5% negative impact is determined by comparing the “impacted population”, which are the populations immediately around the route(s) being changed to the demographics of the entire service area. The system average is shown in the table on the following page. If either a disproportionate burden or disparate impact is found, UTA must take



steps to avoid, minimize, or mitigate impacts where practicable and demonstrate compliance with the prescribed steps outlined by the FTA. Below are the current demographics of the system and are used as the comparison group for the initial review, but will be updated in the final service and fare equity analysis.

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

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

Proposed Changes

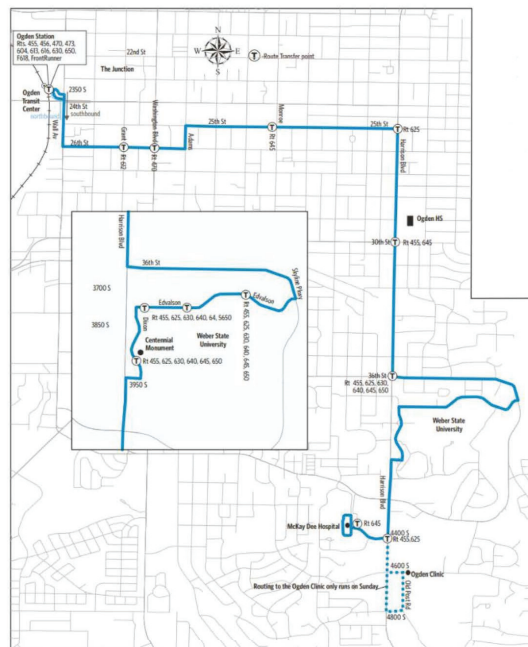
It has been proposed to add a new bus rapid transit line in Ogden that would follow the majority of the existing service offered by the route 603 in Ogden. Broken up by route 603 and the proposed BRT route, the following sections list the populations impacted by the proposed changes. Impacted populations are the people living within the census blocks that are overlapped by a ¼ mile walk radius for regular bus service and a ½ mile walk radius on BRT. The impacted populations are presented in tabular format broken up by low-income and minority populations. The difference between the demographics of the impacted population and the demographics throughout the system are shown in parentheses to the right of each subpopulation. Anything in red indicates the proposed changes trigger our disproportionate burden and/or disparate impact policy and require further steps to be taken before the analysis can be completed.

Route 603 – Replaced by Ogden BRT

The 603 presently runs on the route provided to the right from the Ogden Station through downtown Ogden, passes Ogden High School, passes through Weber State University and circles around the McKay Dee Hospital. It also provides Sunday service to the Ogden Clinic and locations south. It runs every 15 minutes. Below are the demographics of those with a ¼ mile walk access to this route broken up by low-income and minority populations.

Minority Population	
Population:	15,069
Low-Income Population:	4,937
Percent Low-income:	32.7% (10.8%)

Low-Income Population	
Population:	14,565
Low-Income Population:	5,931
Percent Low-income:	40.7% (20.3%)

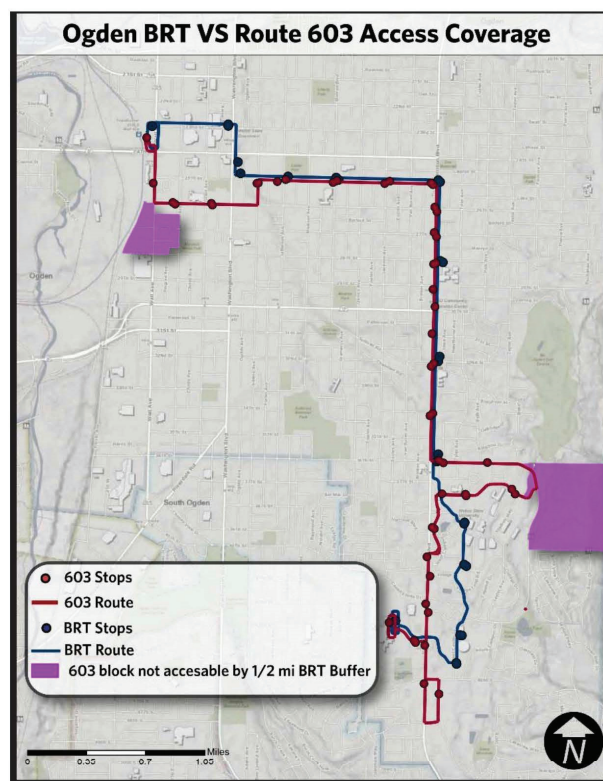




Ogden Bus Rapid Transit – Addition of Service

In place of the existing 603, it is proposed to create a bus rapid transit route. As shown below, it will follow much of the route that the 603 does, but will have some deviations. There was a comprehensive public involvement strategy to determine the alignment involving online public involvement utilizing UTA's "Open UTA" process. There were 223 unique visitors to the website with 97 comments received. UTA also conducted more than 25 community presentations with 252 visitors, received 400 phone survey responses and 568 comments through the various methods UTA utilized. Through this process, the proposed alignment was finalized for the planning phase. The final proposed route deviates from the existing 603's weekday service in two key areas as shown in the map below.

The northern portion of the BRT would not travel on 26th St as the 603, but would travel on 23rd south and pass several work and recreation locations. The second change would be how the route interacts with the Weber State University campus. Instead of looping around locations north of campus, the route would instead go through campus and replace the existing campus shuttle service. The map below shows the stops on the 603 versus the stations proposed on the Ogden BRT with the demographics of those impacted by the addition. Please note that the ½ mile radius is applied to BRT due to the increased amenities and quality of service. The ½ mile radius is based on the distance people are willing to walk to access this service.



BRT Minority Population

Population:	24,930
Low-Income Population:	8,817
Percent Low-income:	35.3% (13.4%)

BRT Low-Income Population

Population:	24,240
Low-Income Population:	9,937
Percent Low-income:	40.9% (20.5%)

Minority Population Losing Access

Population:	562
Low-Income Population:	272
Percent Low-income:	44.5% (26.6%)

Low-Income Population Losing Access

Population:	500
Low-Income Population:	296
Percent Low-income:	59.2% (38.8%)



Comparative Analysis – Service Before and After

In comparing the service offered prior to the proposed Ogden BRT versus the existing service, UTA took the walkability radius of the present service and overlapped the proposed stations walkability radius and reviewed the demographics of those excluded from the walkability radius. Those that have lost access are considered those that are *negatively* impacted by the change. The previous graphic showed the demographics of those impacted, which comprise 562 individuals with higher than average percentages of low-income and minority populations.

As stated previously, a disparate impact and/or disproportionate burden is determined when a proposed change has a 5% or greater negative impact on protected populations than the system average. When reviewing the demographics of those eliminated, there is indication that there may be a disparate impact on minority populations and a disproportionate burden borne by low-income populations.

Conclusion

There are many factors that would be considered in the final analysis of this proposed change that would likely provide adequate justification to proceed in spite of the findings listed above. UTA policy and Federal Transit Authority's Circular 4702.1B dictate the requirements that would need to be satisfied in order to proceed with the changes. These will be fully vetted and elaborated upon in the final analysis, but in the initial review of the proposed route, UTA was able to identify some mitigating factors that would likely be seen as substantial legitimate justification for the proposed changes.

- The stops being eliminated are serviced by other routes that would be able to provide connections to and from the proposed BRT line.
- The addition of service to the north provides greater connectivity to employment opportunities and recreational activities than existing 603 routes which may be of greater use and service to the community.
- There may be additional changes that are proposed to parallel and connecting service that will make up for any service gaps that are identified.
- The improvement of service and increased headways (15 minute to 10 minute headways) will create a better transit environment.
- The ½ mile radius due to increased amenities and service will increase the total impacted population by the proposed BRT from the 603 by nearly 9,900 people. The added population has a high percentage of low-income and minority population.