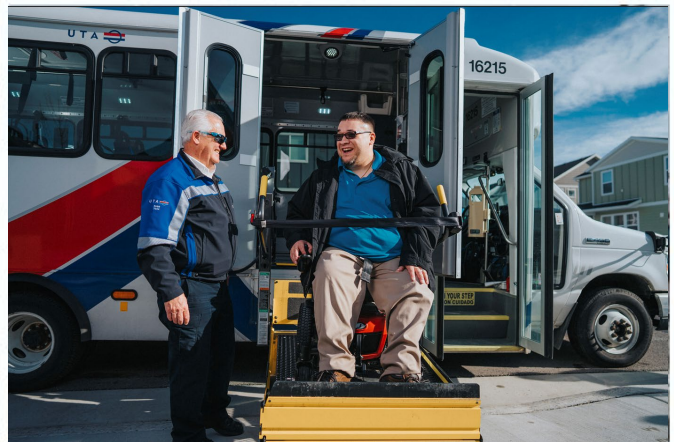




UTAH TRANSIT AUTHORITY



Title VI Program
Updated 2022



Leading the Utah Transit Authority (UTA) is an honor. The excellent transit service UTA provides to our riders and community makes an incalculable difference to the quality of life along the Wasatch Front.

Whether boarding a bus, TRAX, FrontRunner, UTA On Demand or paratransit, UTA is the answer. We are the answer to mobility and access to opportunity. UTA improves our air quality and safeguards our future through environmental sustainability. We create connections to employment, friends, family, and entertainment.

With broad impact comes responsibility. As a steward of public funds, UTA is a public transportation answer for every resident in our six-county service area.

On behalf of UTA, it is my honor to submit this Title VI Program, documenting a five-decade long commitment we have made to provide transit services that improve the lives of those individuals who are most in need. This program shows our dedicated, intentional efforts to ensure fair access, and to prevent any unintended discrimination.

There is a long-standing connection between transportation and civil rights. As an agency receiving public funding from taxpayers of all races, ethnicities, and incomes, UTA unwaveringly commits to preventing any forms of discrimination in our service delivery. There is always work to be done, and we embrace our community partners and customers as we work to develop a living equity lens which provides the best and most impactful service possible.

This Title VI Program represents the culmination of three years of UTA's efforts to ensure equity and accountability for our customers. I appreciate the efforts of the UTA employees who worked tirelessly to create our program, and I thank all UTA employees who collectively work to implement this program every day.

A handwritten signature in blue ink, appearing to read "J. Fox", is positioned above the printed name.

Jay Fox

Executive Director
Utah Transit Authority

#UTAistheAnswer
#TransitistheAnswer



TABLE OF CONTENTS

Introduction	1
Title VI of the Civil Rights Act of 1964	1
UTA’s Commitment	1
General Requirements.....	2
Title VI Notice to the Public	2
Title VI Complaint Procedure.....	3
Title VI Investigations, Complaints, and Lawsuits.....	3
Public Participation Plan.....	4
Summary of Outreach Efforts.....	4
Language Assistance Plan	4
Subrecipient Monitoring.....	4
Board Membership and Recruitment.....	6
Facilities Siting and Construction	8
Service and Fare Equity Analyses	8
Title VI Policies	9
Major Service Change Policy.....	10
Disparate Impact & Disproportionate Burden Policy.....	10
System-Wide Service Standards & Service Monitoring.....	13
Vehicle Loads	13
Vehicle Headways	14
On-Time Performance.....	15
Service Availability	16
Distribution of Amenities	17
Vehicle Assignment.....	19
Demographic Data Report.....	21
Current Service and Service Area	21
Ridership Characteristics and Demographics.....	38
Attachment A – Notice to the Public.....	45
Attachment B – Title VI Complaint Form	48



Attachment C – Customer Communications Policy	52
Attachment D – List of Complaints.....	55
Attachment E – Title VI Compliance Policy.....	69
Attachment F – Public Input Opportunities Policy	74
Attachment G – LEP Plan	80
LEP Maps.....	92
Attachment H – Ridership Survey.....	95
LEP Consideration in Surveys.....	97
Attachment I – Board Resolution on Title VI Program	98
Attachment J – Service and Fare Equity Analyses.....	100

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 inclusion. The organization welcomes robust representation and diversity and prioritizes the community it serves as a guiding principle to all 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 4702.1B. 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 Notice to the Public
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, BRT, 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
- Ogden Transit Center, 2393 South Wall Ave, Ogden

¹ 49 CFR Part 21.9(b)



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 2019, 2020 and 2021.

INVESTIGATIONS

There were no Title VI investigations during the reporting period.

LAWSUITS

There were no Title VI lawsuits during the reporting period.

COMPLAINTS

UTA has had 226 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 related to Title VI 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 time points had at least one major change and included a public input process.

- August 2019
- December 2019
- April 2020
- October 2020
- August 2021
- December 2021

A full report is included in each of the corresponding equity analyses as an Attachment. A full summary of each outreach effort can be found in [Attachment J](#)

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 been 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 5310 Grant Team perform 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 \$10,000 are conducted by UTA to ensure compliance with UTA and 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 Coordinated Mobility website (www.rideuta.com/cmm). 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 COMMITTEE (CAC)

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 renamed Community Advisory Committee (CAC) into its service delivery.

As UTA sought to engage potential membership for the CAC 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:

- Advocacy groups representing minority groups, low-income populations, and persons with disabilities,
- Agencies representing seniors
- Educational institutions
- Chambers of commerce
- Businesses



- Outdoor recreational and active transportation entities
- Governmental stakeholders

These nominations were taken and a final group of ten 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	2 or more Races
CAT	12	11	0	0	0	1	0
CAC	9	5	0	3	0	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. Six service and fare equity analyses and one equity briefing were conducted during the reporting period and are included as [Attachment J](#).

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 thirty-five 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 the routes active during the first quarter of 2021 and the number of trips that exceeded the maximum load capacity as set forth in UTA standards. UTA had 320,144 trips in the first quarter of 2021. Of the trips taken during that time, only seventy 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	16	54
Percent of trips above capacity	22.9%	77.1%

FINDINGS

There were no findings of any disparate impacts on minority populations in UTA’s vehicle loads. Only 22.9% of all 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	34.6	39.9	37.3
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 adjusts 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	91.5%	90.1%	90.9%
TRAX Reliability	92.8%	90.8%	92.1%
FrontRunner Reliability	N/A	90.9%	90.9%

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 with the exception of TRAX which is 2% less reliable but is within a margin that would not elicit a finding.

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 streetcar 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	2,464,647	585,217	23.7%
Population With Walk Access	1,182,293	353,259	29.9%
Percent of Population With Walk Access	48%	60.4%	

According to the data presented, the overall population with walk access has 6.2% more minorities than the service area’s population. Additionally, 60.4% of all the minority population in UTA’s service area fall within the walk access compared to 48% of the service area at large.

	Total Population	Low-Income Population	Percent of Low-Income
Service Area Population	2,464,647	371,559	15.3%
Population With Walk Access	1,182,293	232,769	20.1%
Percent of Population With Walk Access	48%	62.6%	

According to the data presented, the overall population with walk access has 4.8% more are low-income than the service area’s population. Additionally, 62.6% of all the low-income population in UTA’s service area fall within the walk access compared to 48% 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 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 6,058 bus stops in its system. Of those stops, 2,505 or 41.4% of them are in an area where the percent of minorities in the surrounding population exceed the system average. Surrounding population is determined by applying a ¼ mile walk access radius and incorporating any census blocks that are overlapped. Most recently, 2016-2020 ACS data was used in the formulation of the figures on the following page.

	Percent of Stops on Minority Lines with this amenity	Percent of all stops with this amenity
ADA concrete pad	39.9%	34.5%
Seating	60.2%	62.9%
Shelter	33.9%	32.3%
Trash Receptacle	45.5%	41.8%

Additional stations are available on UTA’s TRAX lines, FrontRunner commuter rail and Bus Rapid Transit lines. The amenity distribution is 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 period of June, July and August of 2021. All routes were analyzed, and the average the age of the vehicles was taken for minority routes and non-minority routes. During this time, the minority routes' vehicles were .5 years newer than non-minority routes. See the table below for the figures.

	Route Type	
	Non-Minority	Minority
Average Age in Years	10.1	9.6

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. For this reason, those service types have been omitted.

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

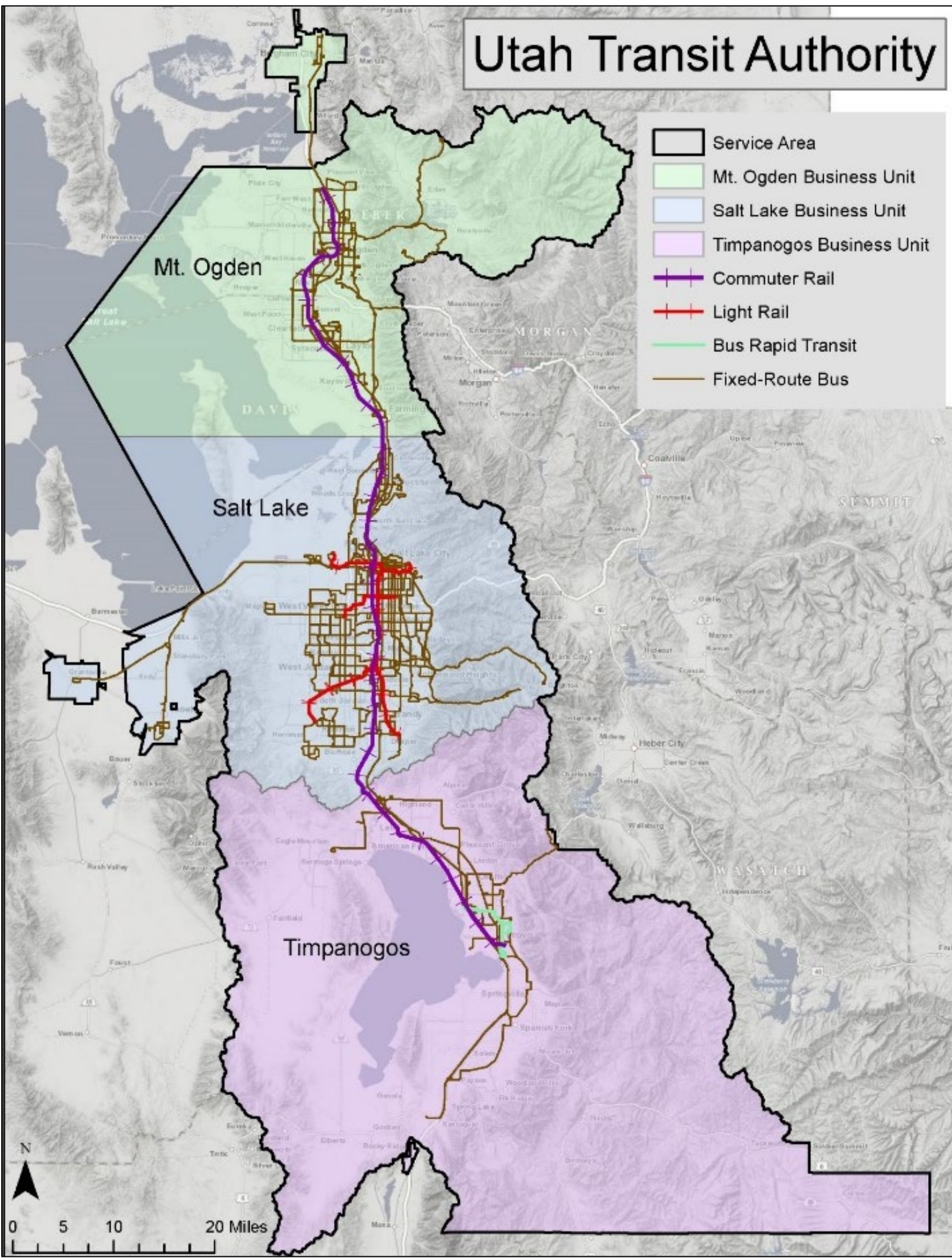
In order to determine the extent to which members of minority groups are beneficiaries of the programs UTA offers, UTA maintains maps using Geographic Information System (GIS) technology. GIS data is used to evaluate proposed major changes and measure the impacts any changes may have on the population 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. Overall Service Area
2. Weber & Davis System Map
3. Salt Lake County System Map
4. Utah County Map
5. Mt. Ogden Population Density
6. Salt Lake Population Density
7. Mt. Timpanogos Population Density
8. Mt. Ogden Minority Population Density
9. Salt Lake Minority Population Density
10. Mt. Timpanogos Minority Population Density
11. Mt. Ogden Minority Areas Above Average
12. Salt Lake Minority Areas Above Average
13. Mt. Timpanogos Minority Areas Above Average
14. Mt. Ogden Low-Income Areas Above Average
15. Salt Lake Low-Income Areas Above Average
16. Mt. Timpanogos Low-Income Areas Above Average

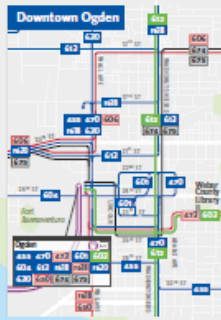
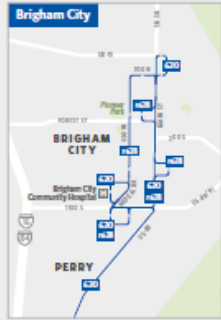
Utah Transit Authority

- Service Area
- Mt. Ogden Business Unit
- Salt Lake Business Unit
- Timpanogos Business Unit
- Commuter Rail
- Light Rail
- Bus Rapid Transit
- Fixed-Route Bus



UTA

Weber & Davis SYSTEM MAP



Legend

- Rail**
 - FrontRunner**
Intercity train service running every 30-60 minutes Monday-Saturday only
- Bus**
 - Frequent bus**
Runs every 15 minutes
 - Regular bus**
Runs every 30 or more minutes
 - Limited bus**
Routes with limited service
 - Ski bus**
Service to ski resorts. No service outside ski season—check website.com/ski for exact dates.
 - Park-and-ride**

Plan your trip

Transit, UTA's preferred trip planning app

Find schedules, see bus and train locations, and get notified about delays and service changes in real time.

More information at rideuta.com





Salt Lake County SYSTEM MAP

↑ to Weber & Davis counties

WEST BOUNTIFUL

↑ to Provo & Ogden

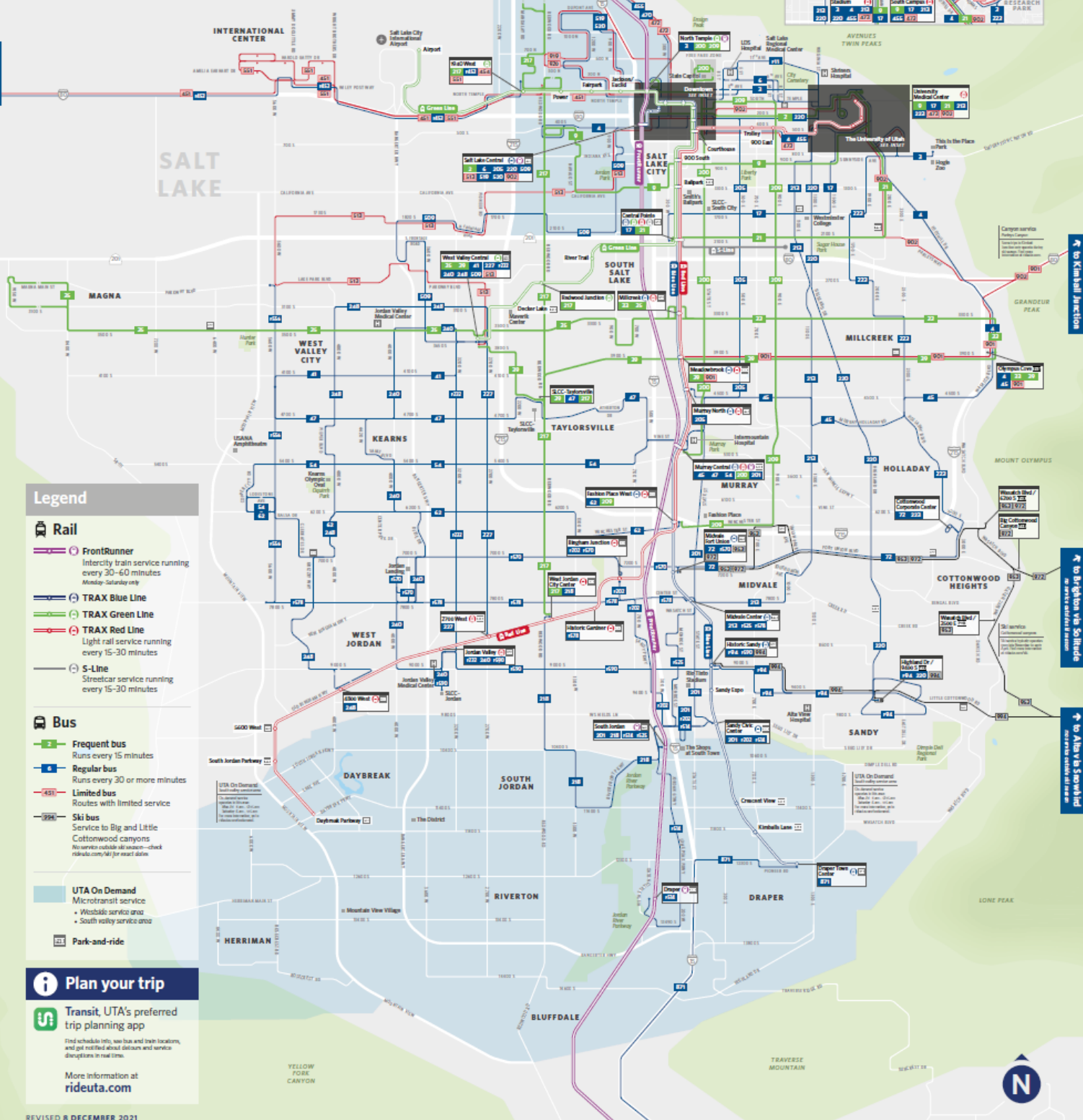
Downtown Salt Lake City

The University of Utah

↑ to Tooele

INTERNATIONAL CENTER

SALT LAKE



↑ to Kimball Junction

↑ to Brighton via Scoville

↑ to Alton & Stansbury

Legend



- FrontRunner**
Intercity train service running every 30-60 minutes Monday-Saturday only
- TRAX Blue Line**
- TRAX Green Line**
- TRAX Red Line**
Light rail service running every 15-30 minutes
- S-Line**
Streetcar service running every 15-30 minutes



- Frequent bus**
Runs every 15 minutes
- Regular bus**
Runs every 30 or more minutes
- Limited bus**
Routes with limited service
- Ski bus**
Service to Big and Little Cottonwood canyons
No service outside ski season—check rideuta.com/ski for exact dates
- UTA On Demand**
Microtransit service
• Westside service area
• South valley service area
- Park-and-ride**

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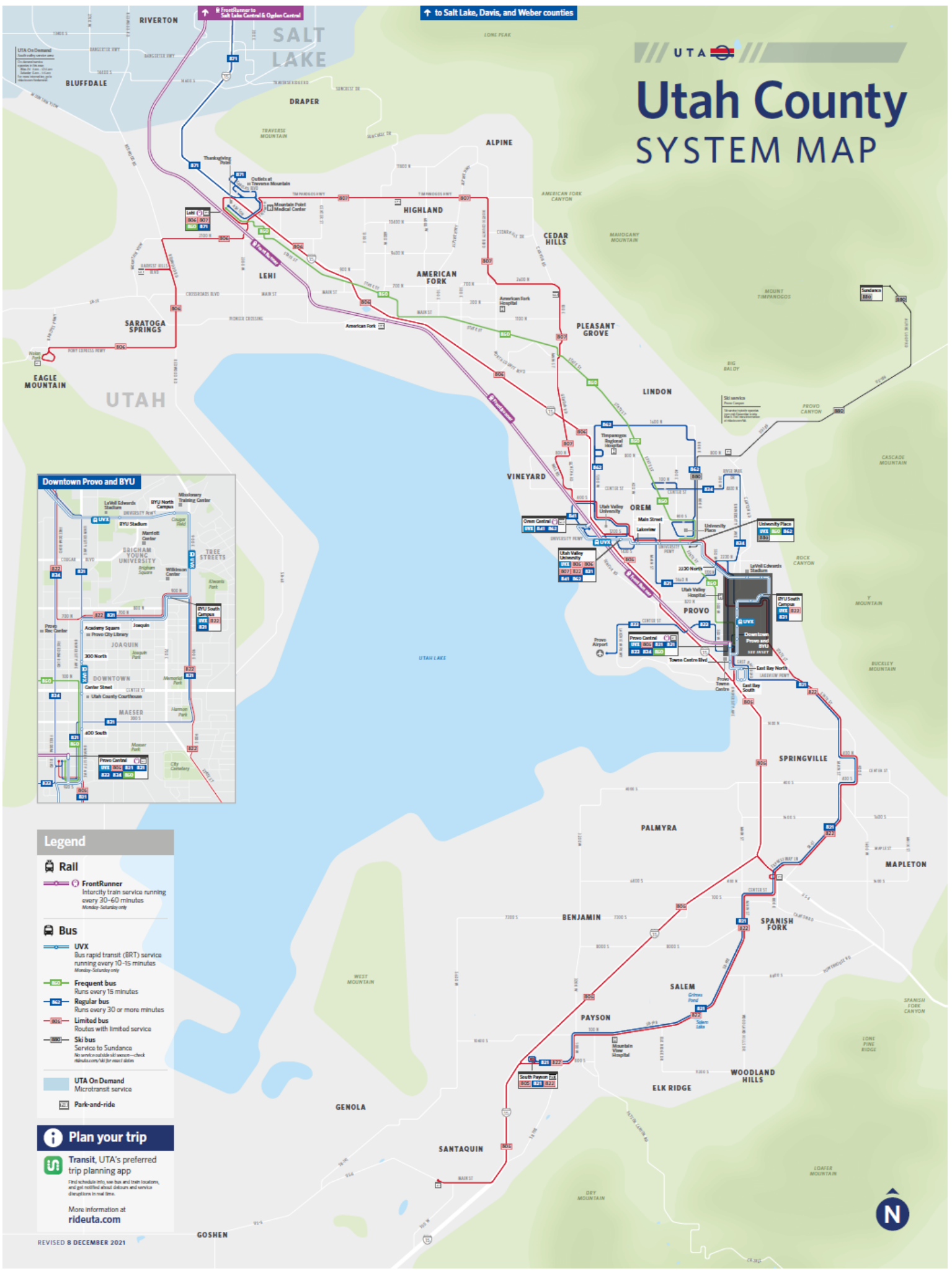
↓ to Utah County

↓ FrontRunner to Provo Central





Utah County SYSTEM MAP



Legend

- Rail**
- FrontRunner**
Intercity train service running every 30-60 minutes Monday-Saturday only
- Bus**
- UVX**
Bus rapid transit (BRT) service running every 10-15 minutes Monday-Saturday only
- Frequent bus**
Runs every 15 minutes
- Regular bus**
Runs every 30 or more minutes
- Limited bus**
Routes with limited service
- Ski bus**
Service to Sundance
No service outside of season—check rideuta.com for season dates
- UTA On Demand**
Microtransit service
- Park-and-ride**

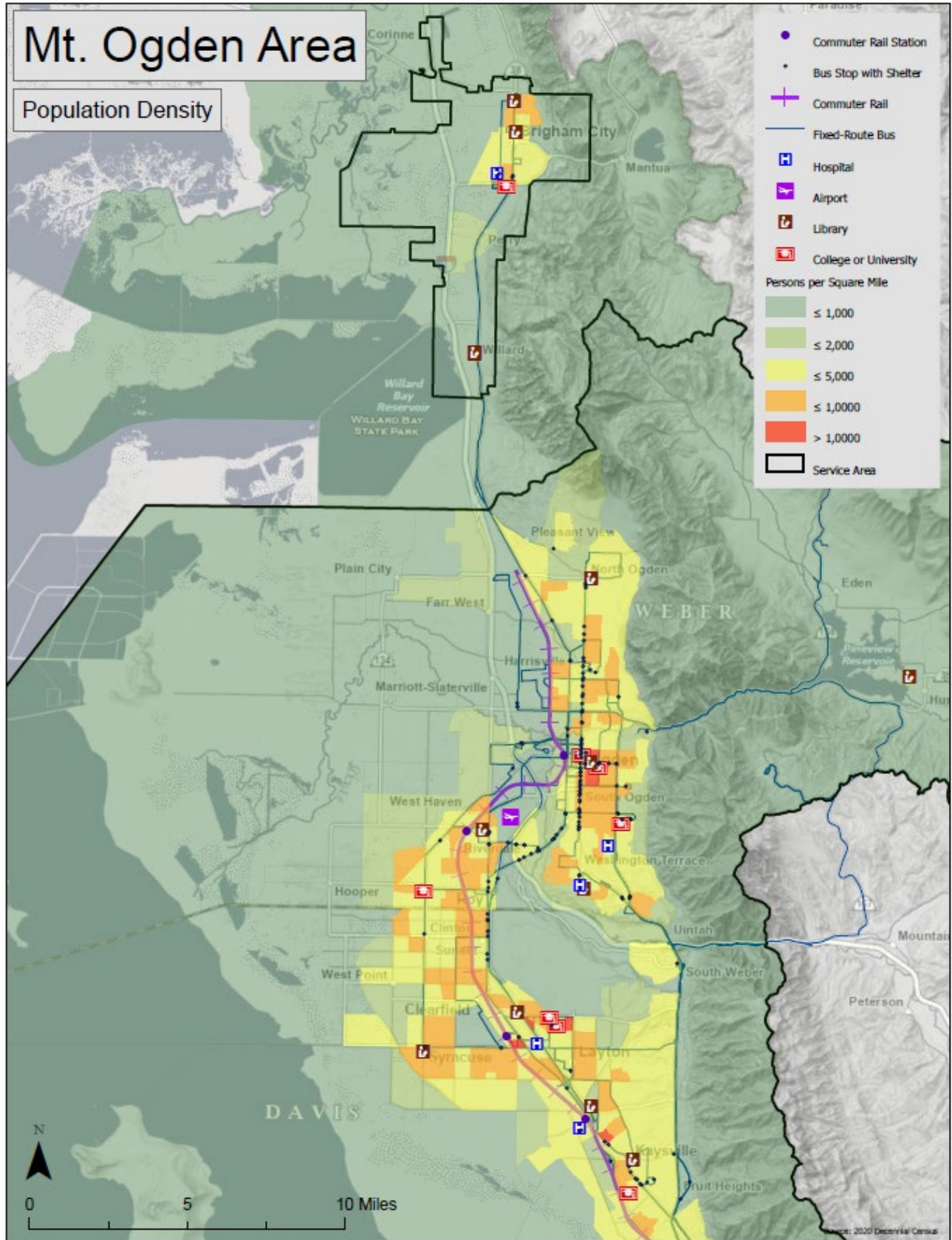
Plan your trip

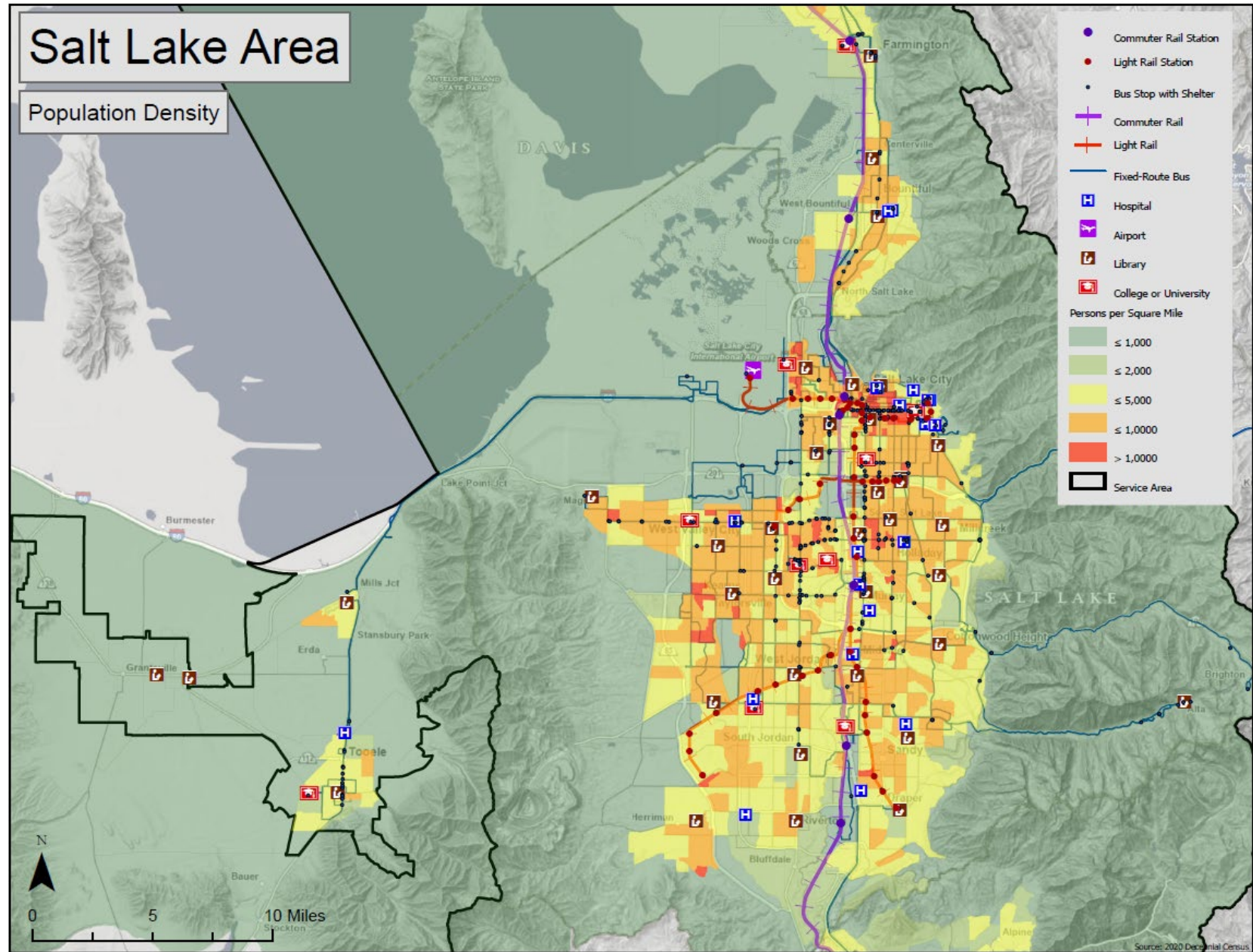
Transit, UTA's preferred trip planning app

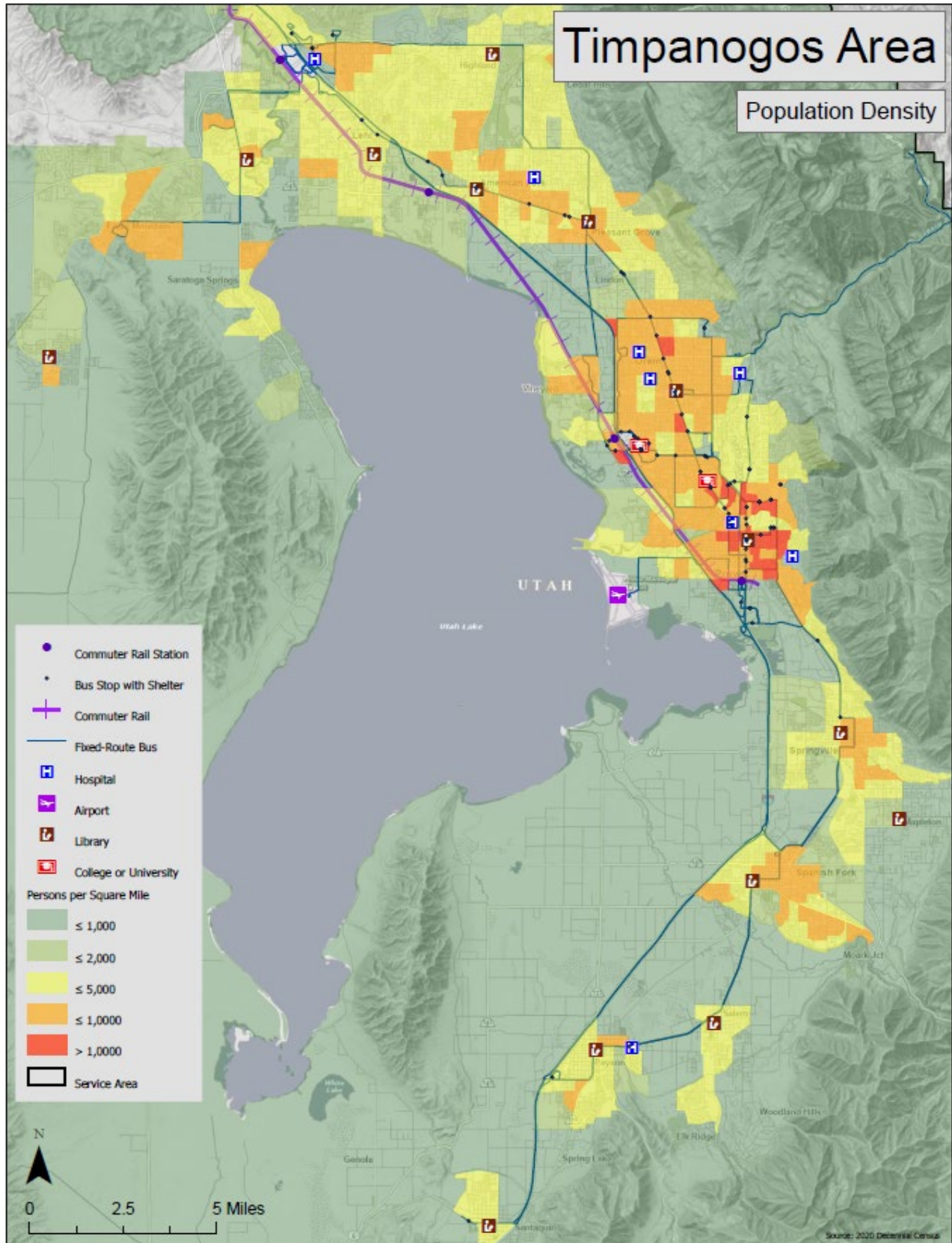
Find schedule info, see bus and train locations, and get notified about delays and service disruptions in real time.

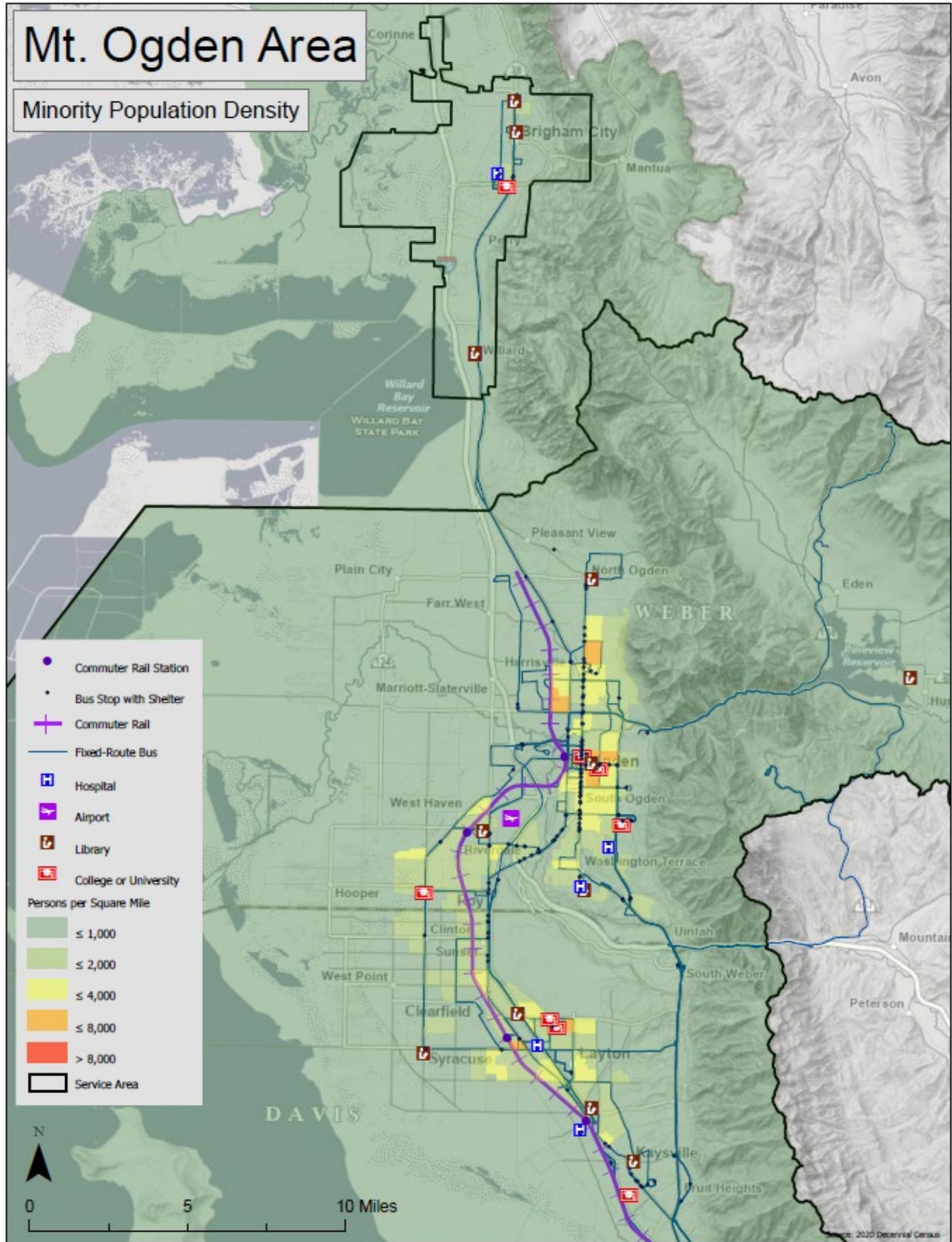
More information at rideuta.com

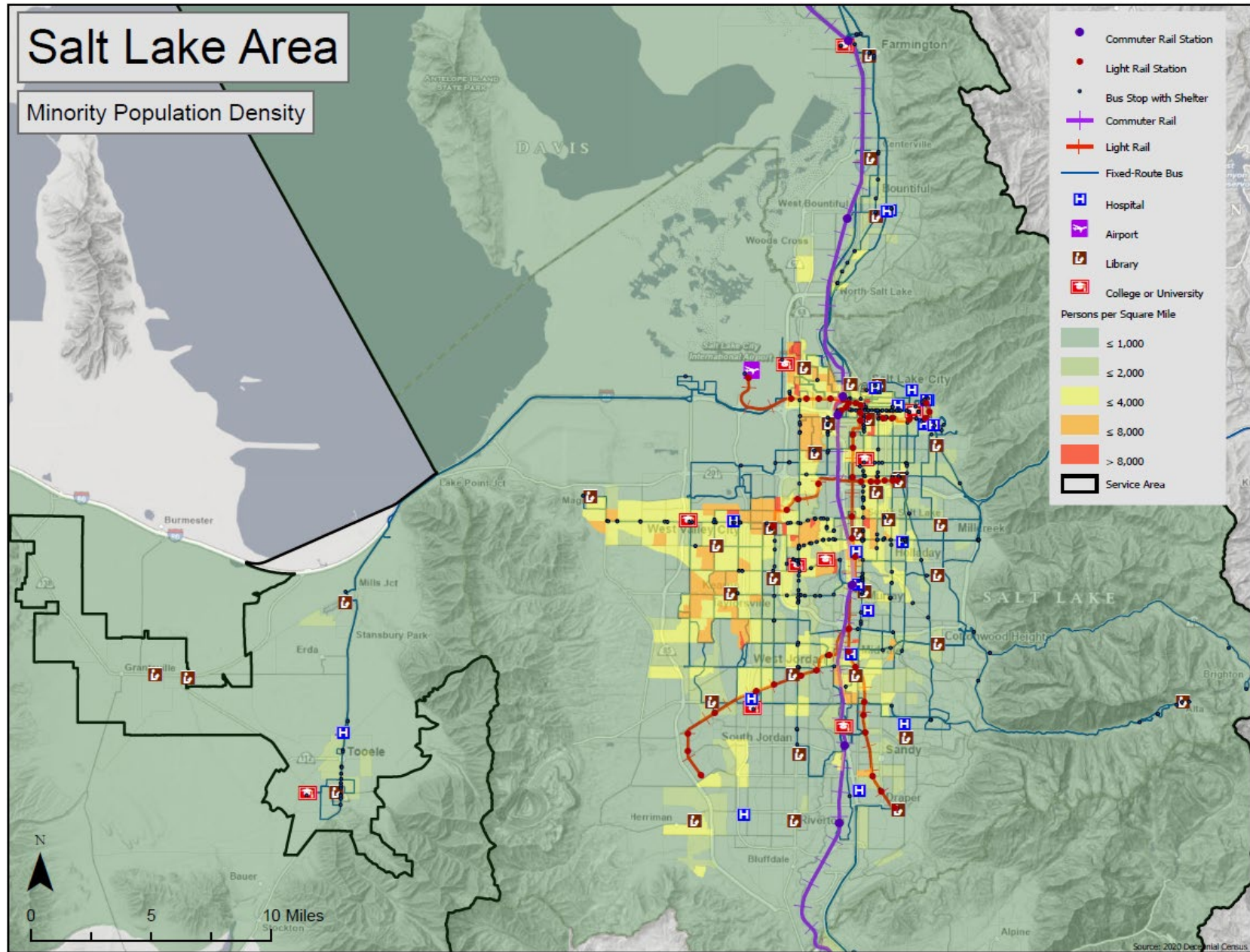


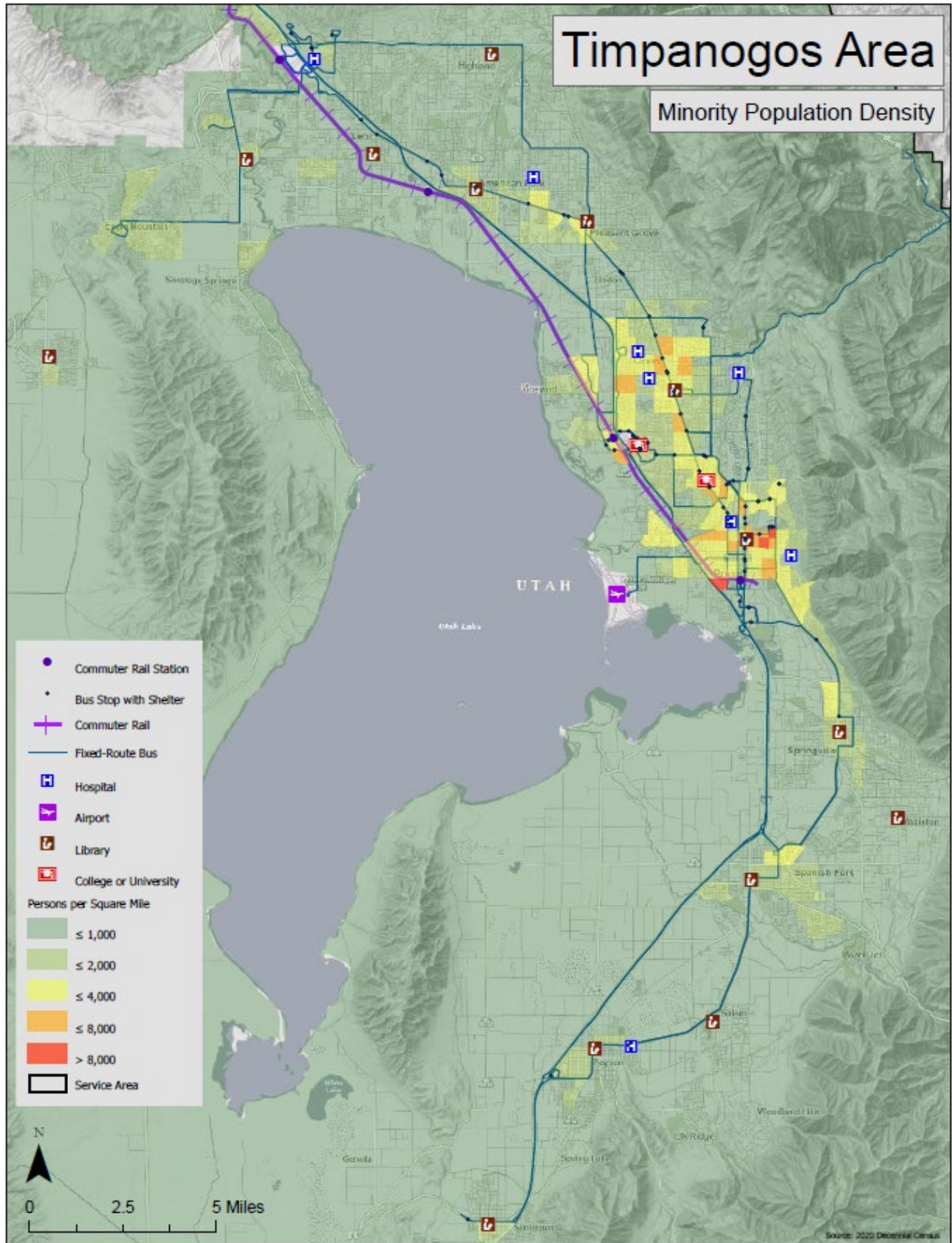


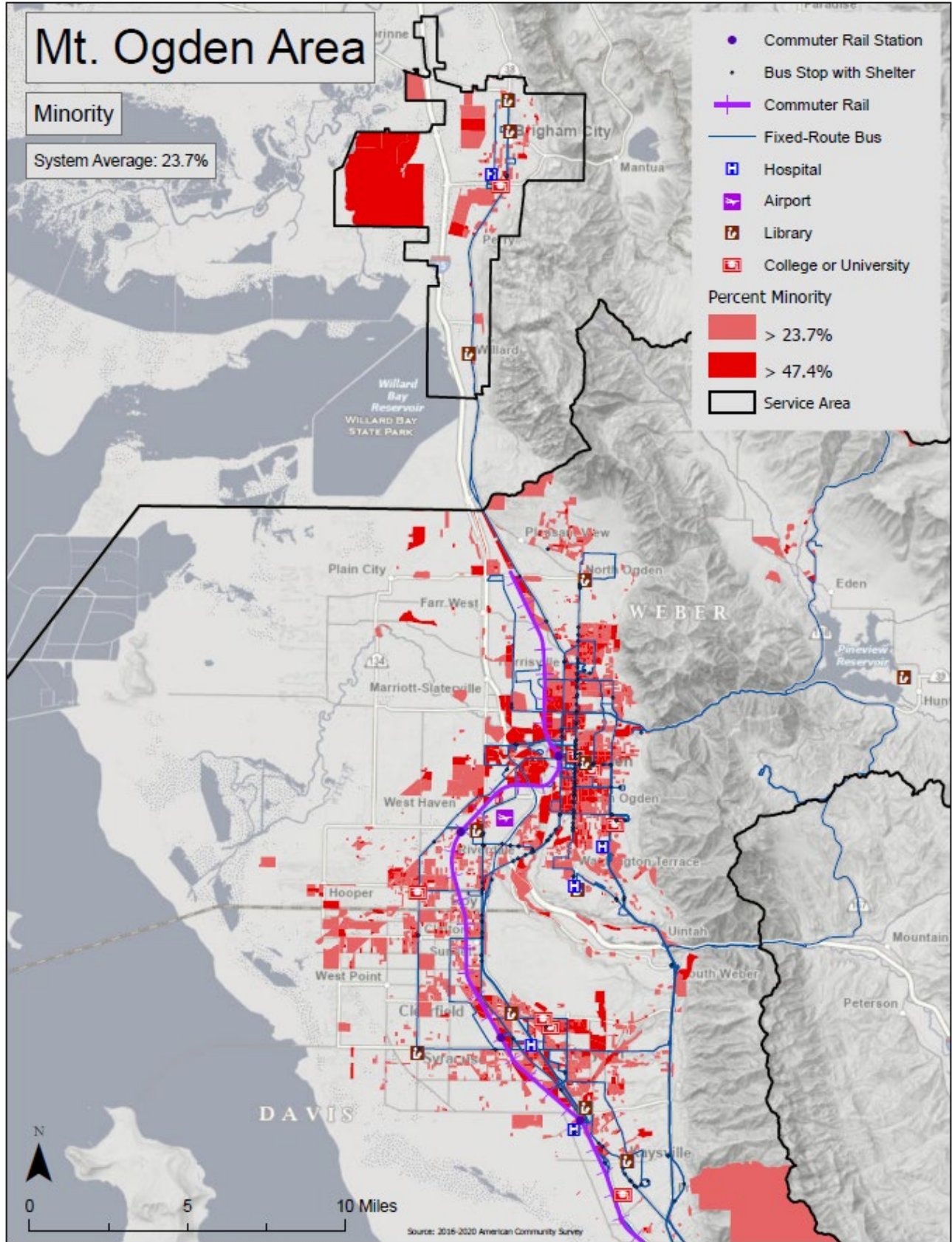


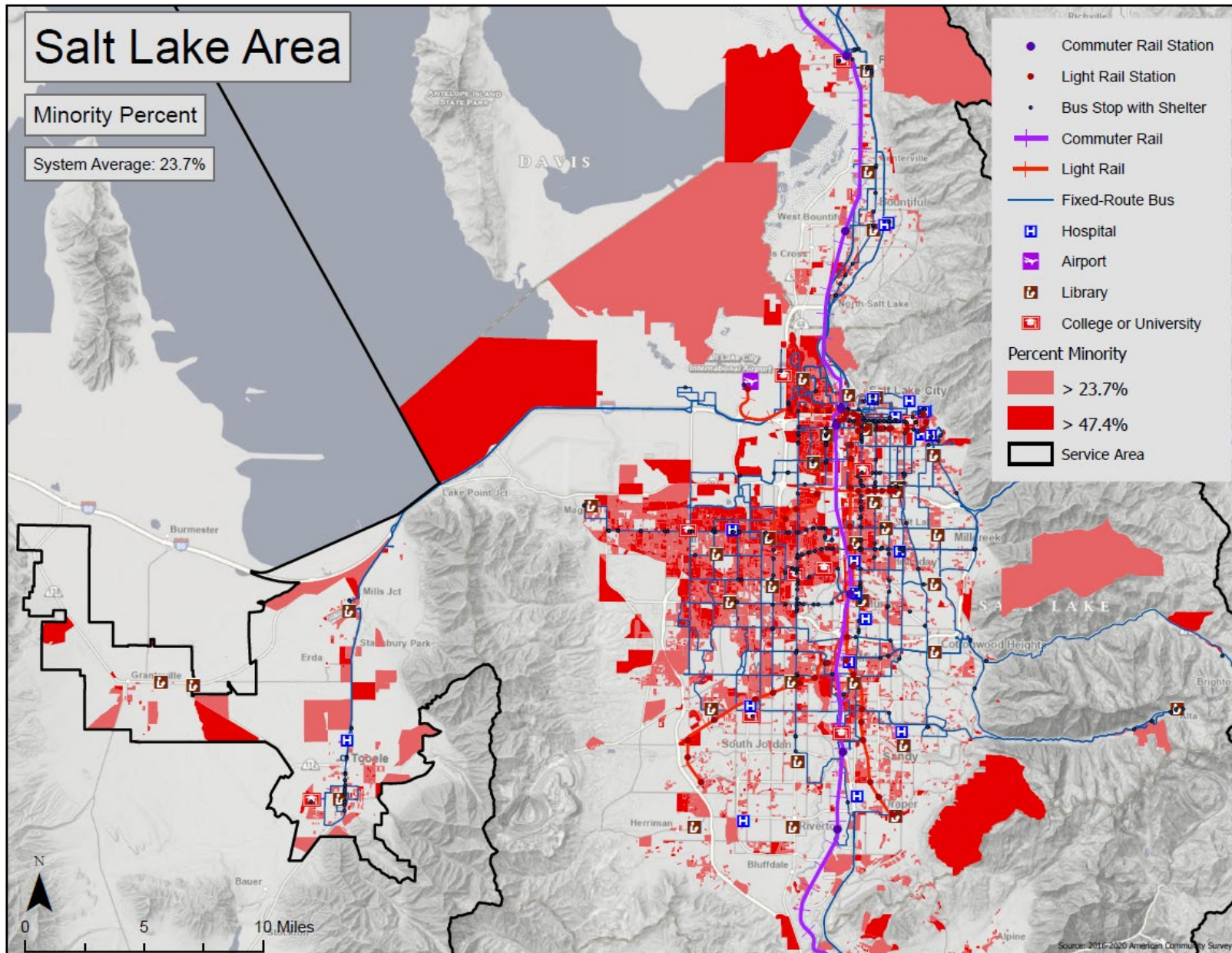


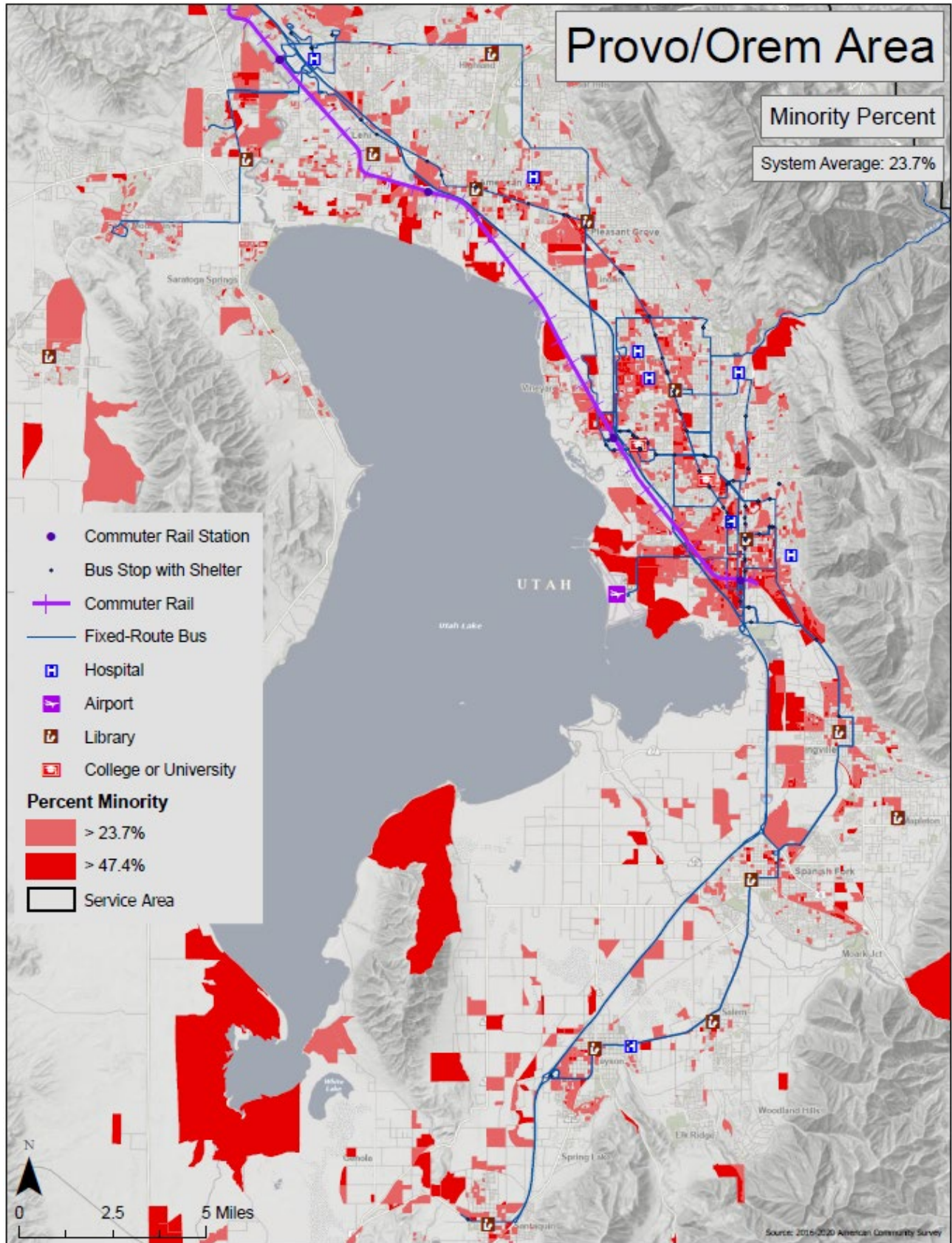


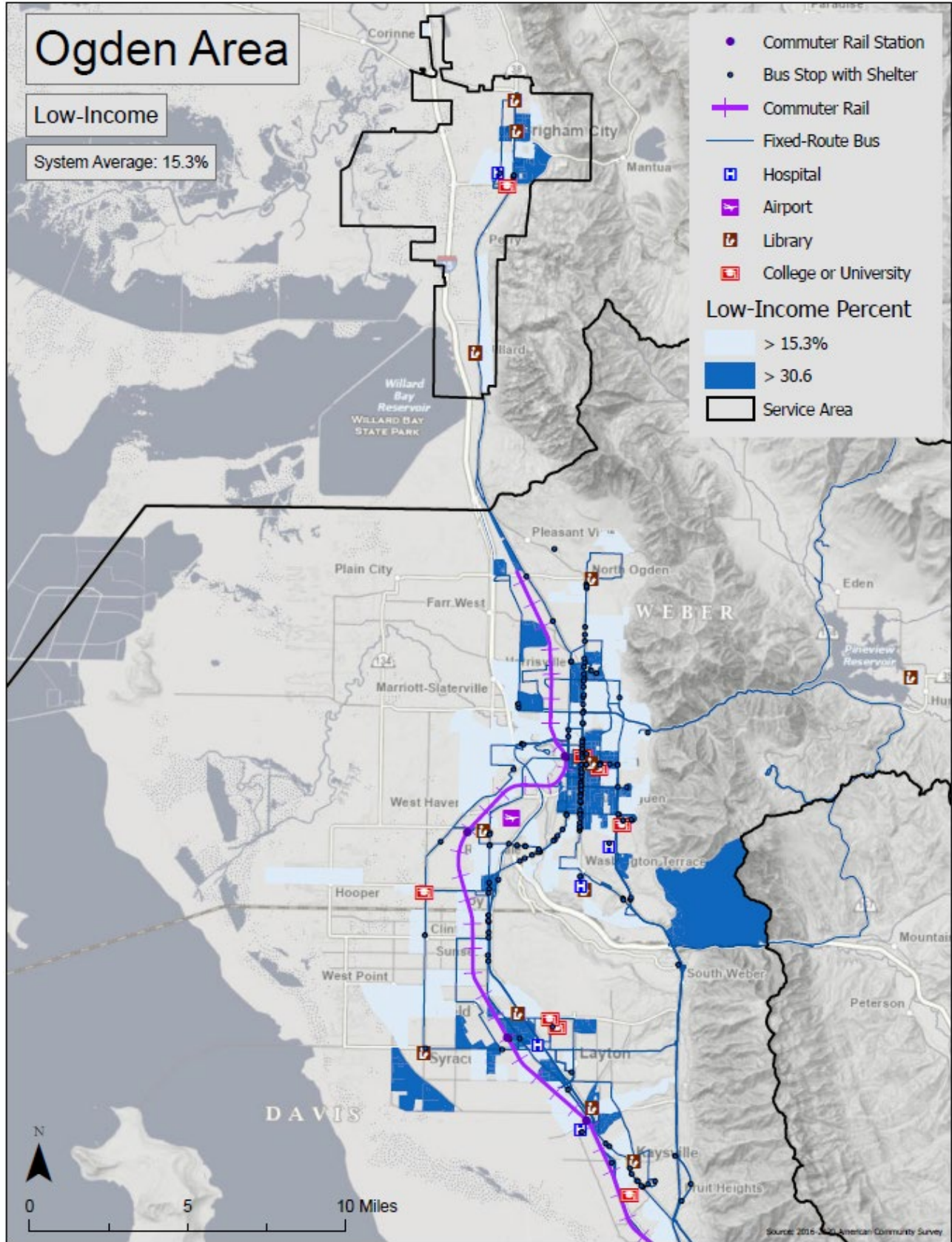


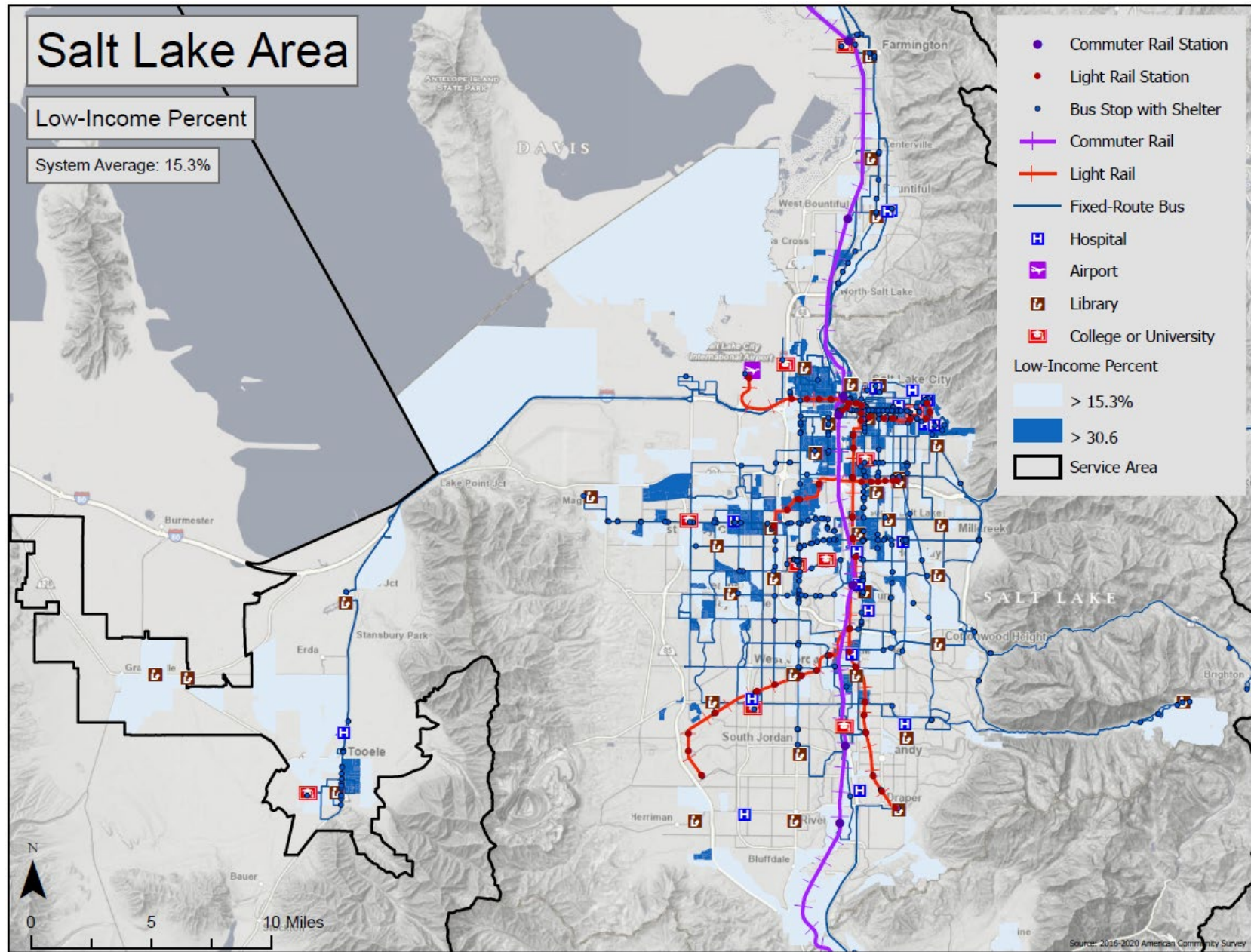


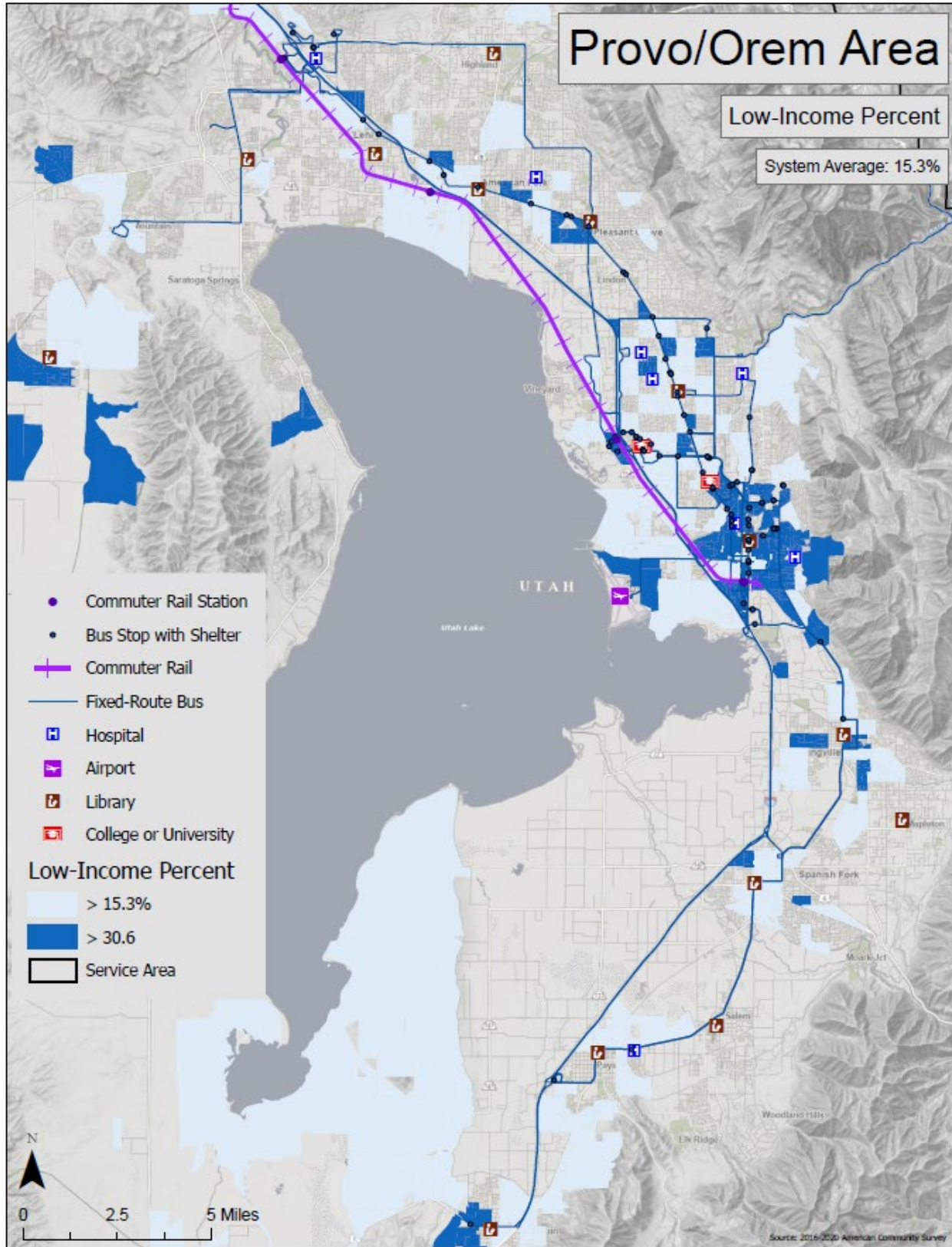












RIDERSHIP CHARACTERISTICS AND DEMOGRAPHICS

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 September 16, 2019 and December 11, 2019. During this survey period, 13,417 usable surveys were collected. Of those collected, 13,328 were conducted in English and 89 were conducted in Spanish. 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 5:30 a.m. and 10:00 p.m. The survey staff rode trips in both directions of travel. The survey sampling plan was designed to obtain surveys from 10% of average weekday boardings for rail, while setting a 7.5% average weekday boarding level for buses.

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 exceeded targets.

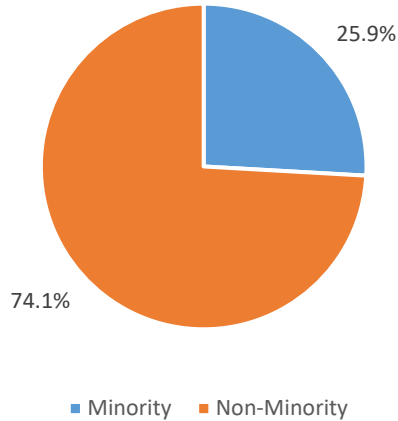
ROUTE	AVERAGE WEEKDAY RIDERSHIP*	SAMPLING GOAL	SURVEYS (UNWEIGHTED/NOT EXPANDED)	% OF TARGET	SURVEYS (WEIGHTED/EXPANDED)	AVERAGE WEIGHT
TRAX- Red	22,107	1,708	2,024	119%	22,107	10.92
TRAX- Blue	15,811	1,476	1,800	122%	15,811	8.78
TRAX- Green	14,771	1,365	1,682	123%	14,771	8.78
Frontrunner	18,825	1446	1,947	135%	18,825	9.67
S-Line	1,270	112	164	146%	1,270	7.75
Bus	72,284	4,853	5,800	120%	72,284	12.46
Total	145,069	10,960	13,417	122%	145,069	10.81

*Note: Ridership data for TRAX, the Sugarhouse streetcar and FrontRunner are weekday data (excluding holidays) from the period between September and November, 2019. Ridership data for bus routes are weekday data (excluding holidays) from the period between August and December 2019.

UTA structured the survey questions on income to reflect 150% of the federal poverty level and asked about household size. Throughout this section any reference to “Low Income” is a cross reference between household size and income as it relates to that 150% poverty level.

DEMOGRAPHIC OVERVIEW

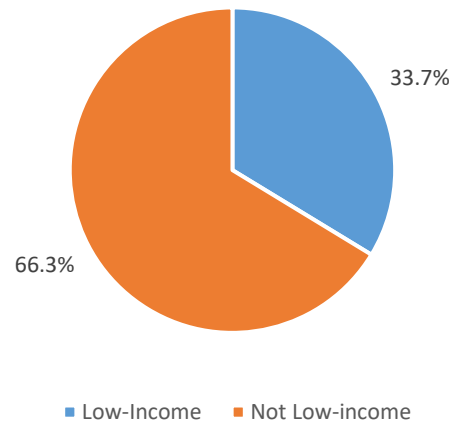
RACE/ETHNICITY OF RIDERS



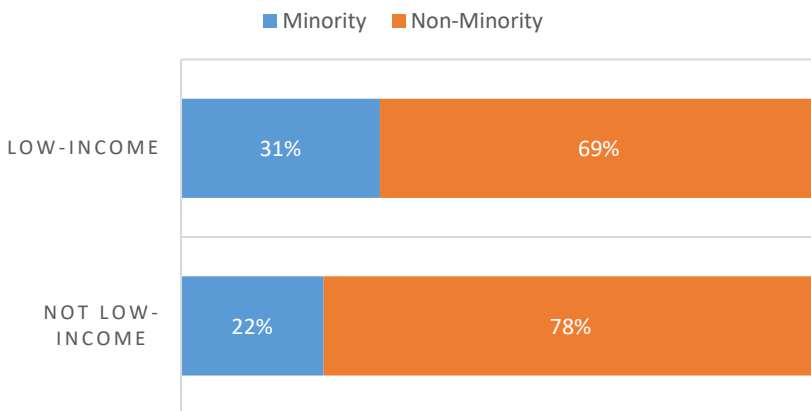
Of the people surveyed, 25.9% of them identified as a minority per the FTA’s definition. This is 2.6% higher than population of UTA’s service area utilizing 2019 ACS data

Low-income, defined as survey respondents that had less than 150% of the federal poverty level based on household income and size, comprise 33.7% of those surveyed. When comparing this to 2019 ACS poverty data, this is 17.5% more than the population of UTA’s service area.

INCOME OF RIDERS



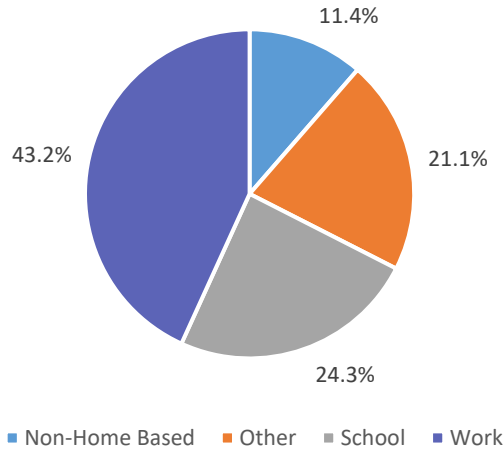
INCOME AND RACE/ETHNICITY



The table to the left shows the racial/ethnic breakdown based on 150% federal poverty level. It shows that minority populations are represented in the low-income population at a 9% greater rate than those above the 150% threshold.

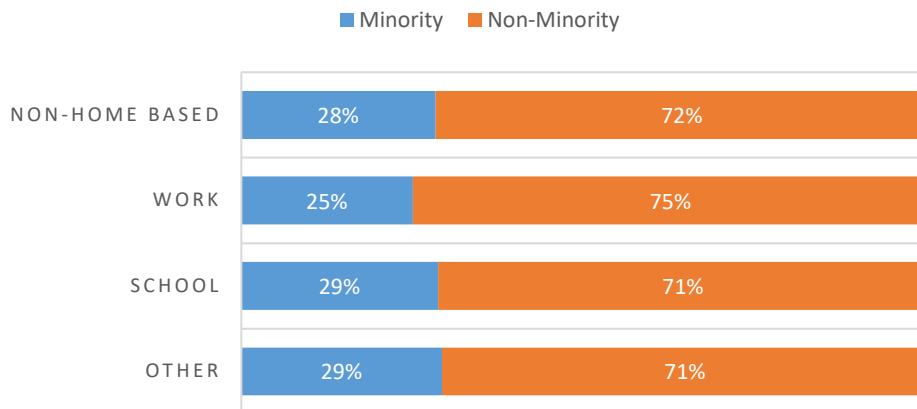
TRAVEL PATTERNS

OVERALL TRIP PURPOSE

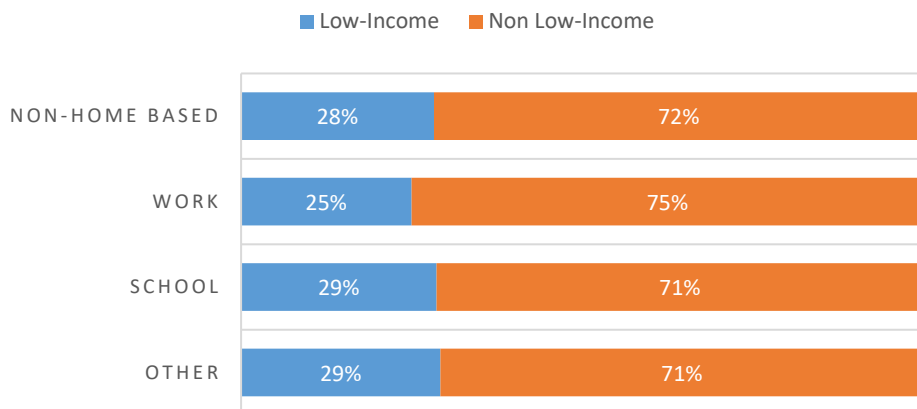


FTA requires that transit providers include information regarding the trips taken by transit provider’s ridership including the demographic profile comparing minority riders and non-minority riders. The following three tables show the reported purpose for the trips taken.

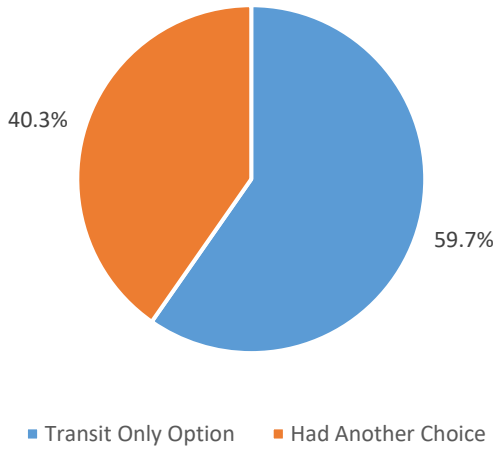
TRIP PURPOSE RACE/ETHNICITY



TRIP PURPOSE BY INCOME



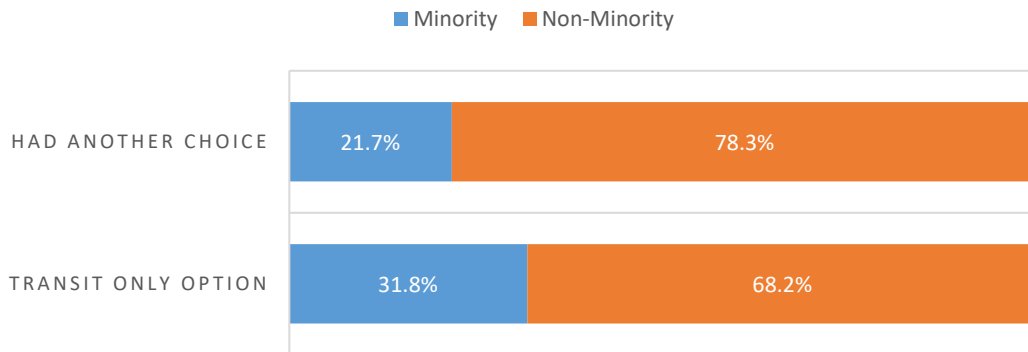
OVERALL CHOICE VS CAPTIVE



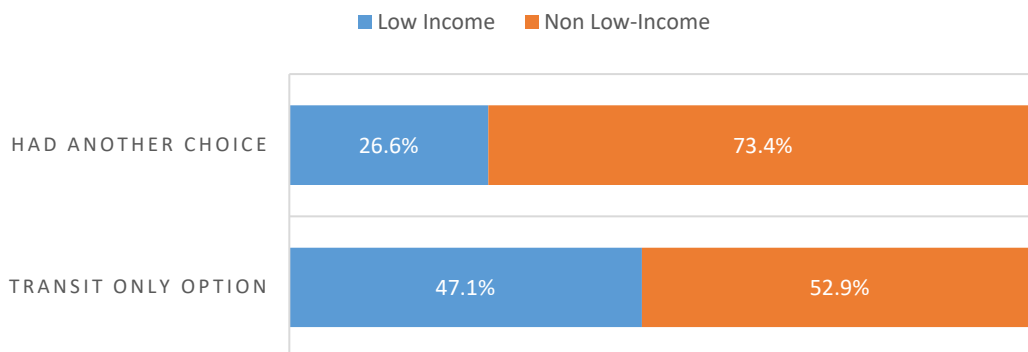
UTA reviewed the demographics and income level of its riders' need to use transit services. Riders were asked if they used transit because they had no other option or if they were able to utilize other means to get around but choose to use transit.

As is evident in the charts below, minorities comprise 10% more of the captive riders than those riding by choice. Additionally, low-income comprise more than 20% of captive riders when compared to those riding by choice.

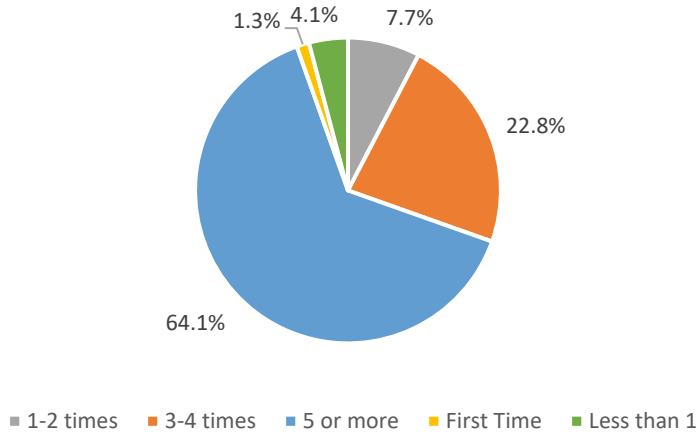
CHOICE VS CAPTIVE BY RACE/ETHNICITY



CHOICE VS CAPTIVE: LOW-INCOME

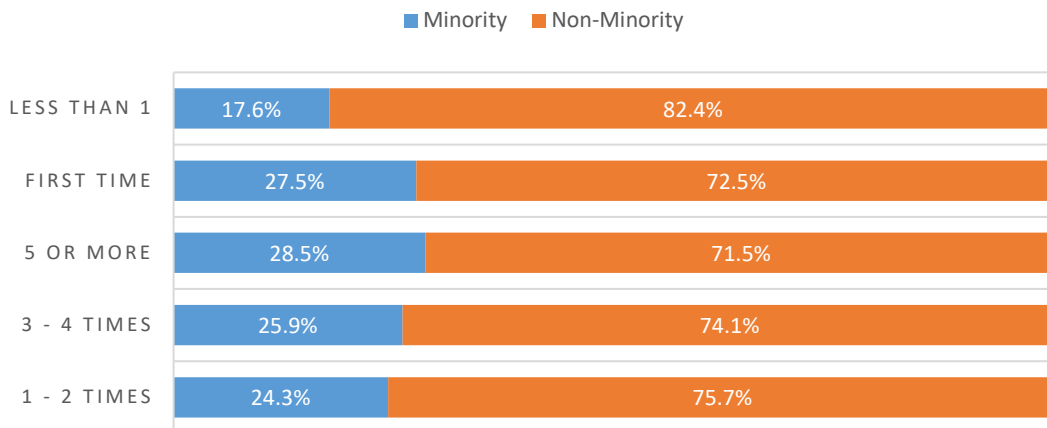


OVERALL WEEKLY TRANSIT USE

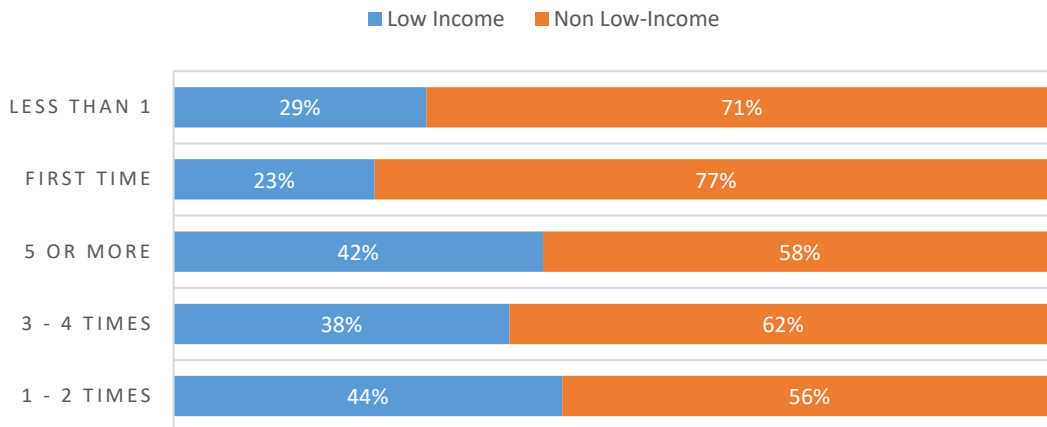


The three charts on this page show the frequency by which the surveyed riders utilize transit services. The majority of riders stated that they used the system five or more times per week

WEEKLY TRANSIT USE BY RACE/ETHNICITY

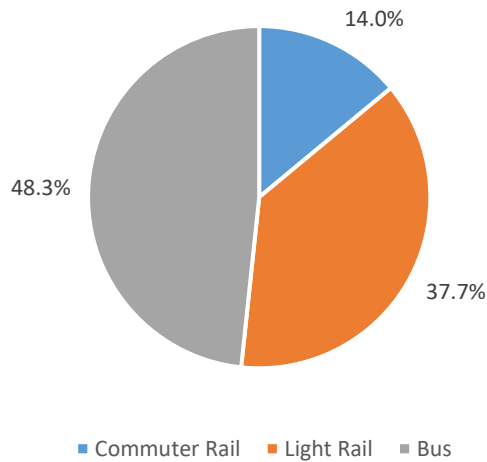


WEEKLY TRANSIT USE BY INCOME



DEMOGRAPHICS BY MODE

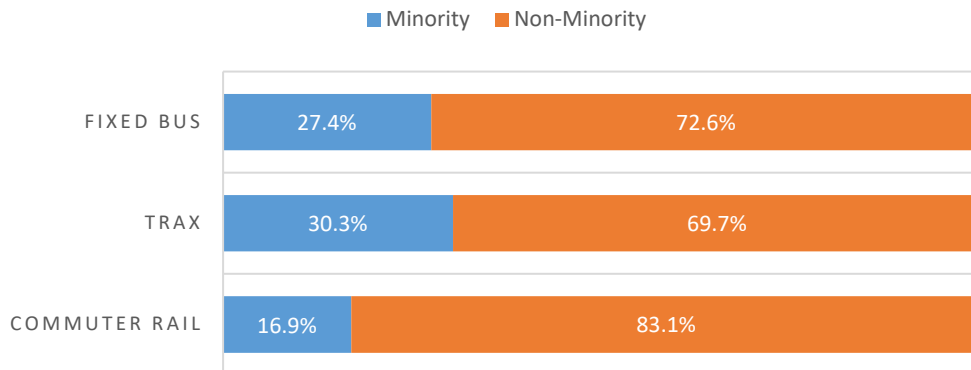
OVERALL SURVEYED BY MODE



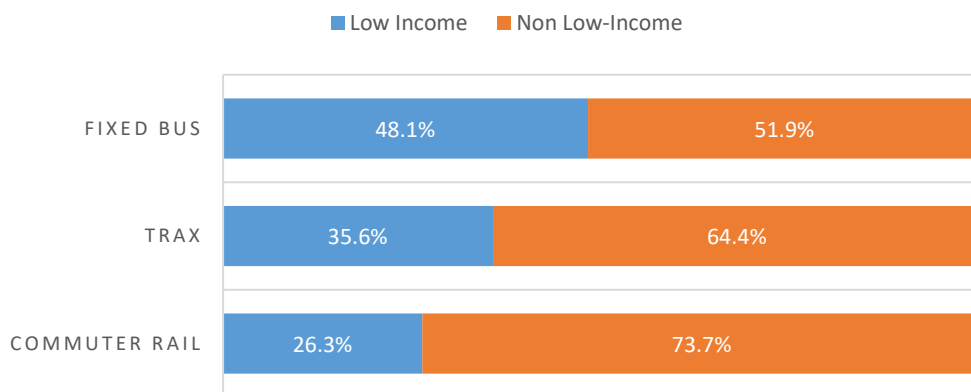
Depicted in these three charts are a breakdown of those surveyed that utilize UTA’s three primary modes of transportation.

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

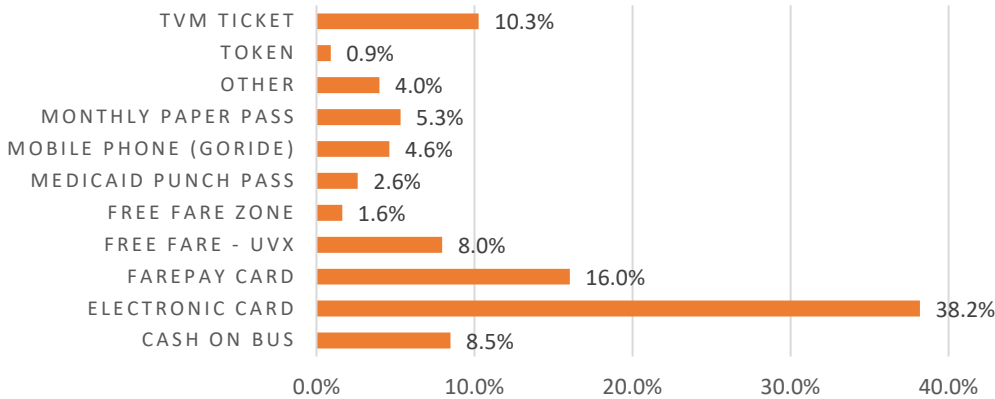


INCOME LEVEL BY MODE



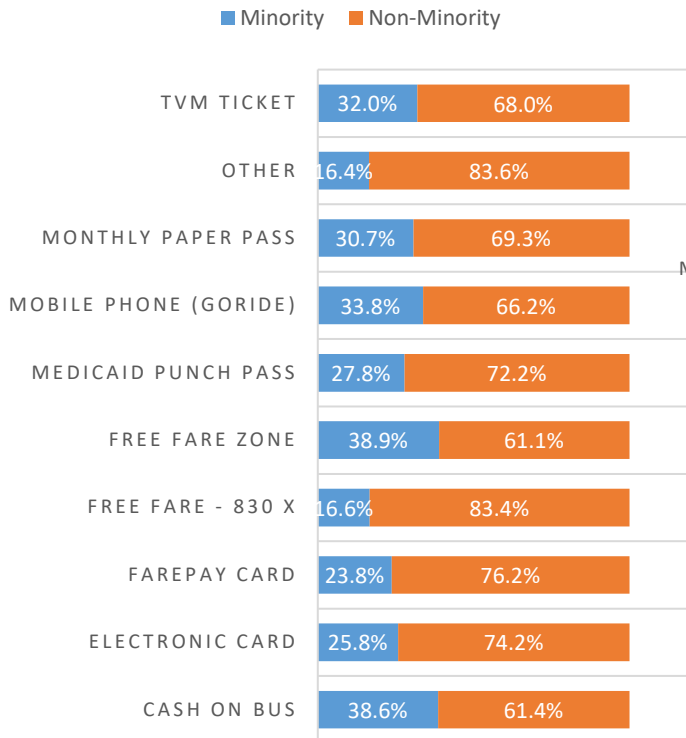
FARE USAGE

FARE PAYMENT TYPE USAGE

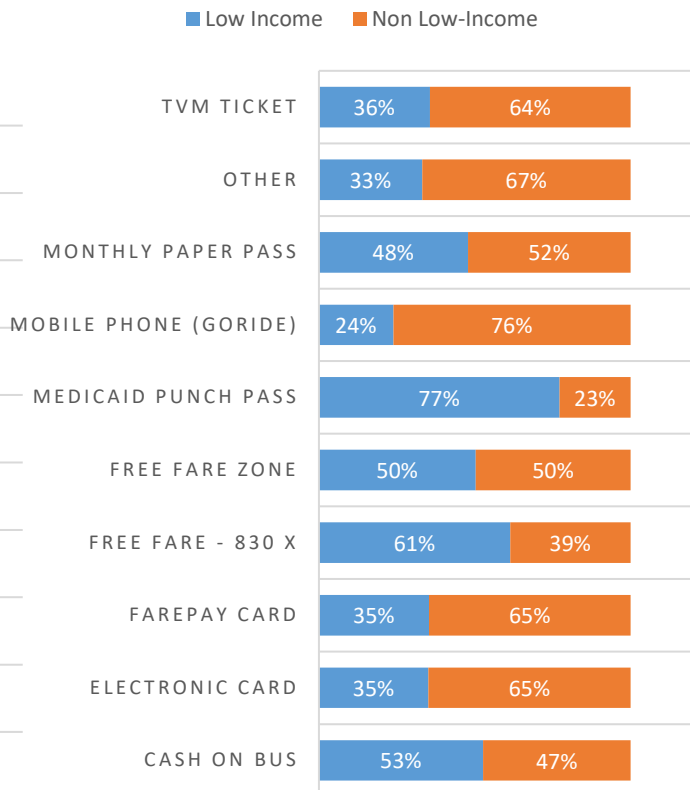


UTA has assessed the responses as to what method of payment was used in determining the demographics and usage of different fare payment types. These charts depict their payment type usage and the demographic/income levels of the riders surveyed.

FARE USAGE BY RACE/ETHNICITY



FARE USAGE BY 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

TITLE VI

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.

Contact UTA Customer Service at 801-743-3882, or submit an electronic comment form at rideuta.com.

TÍTULO VI

El Título VI de la Ley de derechos civiles de 1964 lo protege de toda discriminación debido a su raza, color u origen nacional. Si cree que lo han tratado de manera injusta al recibir los servicios de UTA debido a su raza, color u origen nacional, infórmenos al respecto.

Comuníquese con el servicio de atención al cliente de UTA al 801-743-3882 o envíe un formulario electrónico con sus comentarios en rideuta.com.



UTAH TRANSIT AUTHORITY



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	Ogden: 1-877-882-0200
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	Orem/Provo: 1-877-882-0200
1-877-882-0200	Servicios de transporte para discapacitados:
Ogden: 1-877-882-0200	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 Amanda Salmon, UTA's ADA Compliance Officer, at (801) 287-3536 or asalmon@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

Please tell us why you are writing to us today

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons involved including the names and contact information of any witnesses and of those you believe discriminated against you. You may attach any written materials or other information relevant to your complaint.

Your Contact Information

First Name: _____ Last Name: _____

Address: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Email: _____

UTA staff would like to reach out to you regarding your concerns. Would you be willing to be contacted by a member of UTA staff if we have further questions?

- Yes, I would answer follow-up questions
- No, I do not want to be contacted

Would you like UTA to contact you once our investigation is complete?

- Yes, I would like a response
- No, I do not require a response

I have read the statement above and affirm that it is true to the best of my knowledge, information and belief.

 Complainant's Signature

 Date



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 Amanda Salmon, Oficial de Cumplimiento ADA de UTA, al (801) 287-3536 o en asalmon@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

2019 Complaints

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
1/8/2019	131727	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not Verified	No action taken - Unable to corroborate customer account.
2/1/2019	133860	Customer stated they were treated poorly due to protected status	Race	Unknown	Closed - Verified	Operator coached
2/12/2019	134794	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
2/13/2019	134830	Passed by - Allegedly due to protected status	National Origin	Hispanic/Latino	Closed	Not enough information provided to follow up
2/19/2019	135211	Refused transfer	Color	White	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
2/19/2019	135211	Customer stated they were treated poorly due to protected status	Race	White	Closed - Not at Fault	aken - Investigation found no fault in UTA employee
2/22/2019	135497	Bus running late	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
2/22/2019	135533	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed	Not enough information provided to follow up
2/25/2019	135639	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
3/1/2019	136135	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
3/13/2019	137000	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
3/14/2019	137163	Passed by - Allegedly due to protected status	Race	Did not specify	Closed - Verified	Operator coached
3/21/2019	137619	Passed by - Allegedly due to protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
3/28/2019	138283	Customer stated operator was treating another passenger poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
3/29/2019	138302	Customer alleged that officers only checked fares of certain people	Race	Black/African American	Closed	No action taken – No customer information provided.
3/30/2019	138463	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee



Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
4/1/2019	138486	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Verified	Operator coached
4/2/2019	138648	Alleged different treatment based on race in a fare dispute	National Origin	Hispanic/Latino	Closed	No action taken - Investigation found no fault in UTA employee
4/5/2019	138970	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
4/9/2019	139268	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
4/16/2019	139946	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
5/2/2019	141425	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
5/8/2019	141855	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Verified	Operator coached
5/14/2019	142373	Customer alleged that officer discriminated against another passenger	National Origin	Hispanic/Latino	Closed	No action taken - Complaint regarding an old YouTube Video
5/15/2019	142437	Customer stated operator was treating another passenger poorly due to their protected status	Color	Black/African American	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
5/15/2019	142502	Passed by - Allegedly due to protected status	National Origin	Hispanic/Latino	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
5/16/2019	142534	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
5/18/2019	142735	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
5/20/2019	142847	Customer stated operator was treating another passenger poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
5/21/2019	142859	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
6/5/2019	144095	Alleged different treatment based on color of skin in a fare dispute	Color	Did not specify	Closed - Not At Fault	No action taken - Investigation found no fault in UTA employee
6/13/2019	144693	Customer denied boarding	National Origin	Asian	Closed - Not At Fault	Not enough information provided to follow up
6/14/2019	144817	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed	Not enough information provided to follow up
6/17/2019	144950	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed	No action taken - Investigation found no fault in UTA employee



Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
6/19/2019	145230	Customer stated they overheard discriminatory language from an operator	National Origin	Hispanic/Latino	Closed - Verified	Operator coached
6/25/2019	145641	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed	Officer coached on customer perception - No finding of misconduct
7/5/2019	146486	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not Verified	No action taken - Unable to corroborate customer account.
7/12/2019	147153	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
7/19/2019	147748	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed	Operator coached
7/25/2019	148238	Customer stated operator was treating another passenger poorly due to their protected status	Race	White	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
7/26/2019	148289	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
7/30/2019	148655	Customer stated he was racially profiled by UTA Police	Race	Did not specify	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
8/6/2019	149227	Customer stated operator was treating another passenger poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
8/19/2019	150421	Passed by - Allegedly due to protected status	Race	Did not specify	Closed	Operator coached - Pass by due to multiple circumstances verified on video
8/20/2019	150704	Customer stated operator was treating another passenger poorly due to their protected status	Race	Black/African American	Closed - Verified	Operator coached
8/31/2019	151925	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Verified	Operator coached - Racial allegations not supported
9/13/2019	153159	Alleged different treatment of passenger based on race in a fare dispute	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
9/17/2019	153589	Customer stated other passenger was treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not Verified	No action taken - Unable to corroborate customer account.
9/19/2019	153756	Customer stated other passenger was treated poorly due to protected status	National Origin	Hispanic/Latino	Closed	No action taken - Unable to corroborate customer account.
9/26/2019	154381	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not Verified	No action taken - Unable to corroborate customer account.
10/4/2019	155238	Customer stated other passenger was treated poorly due to protected status	National Origin	Hispanic/Latino	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
10/23/2019	156980	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Verified	Operator coached
10/24/2019	157144	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
10/25/2019	157314	Customer stated they were treated poorly due to protected status	National Origin	Did not specify	Closed	Not enough information provided to follow up
10/31/2019	157783	Customer stated they were treated poorly due to protected status	National Origin	Black/African American	Closed - Verified	Operator Coached
11/6/2019	158260	Customer stated they were treated poorly due to protected status	Color	Black/African American	Closed - Not Verified	No action taken - Unable to corroborate customer account.
11/13/2019	158716	Customer stated they were treated poorly due to protected status	Race	Black/African American	Closed - Verified	Operator coached - Racial allegations not supported
11/14/2019	158850	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Verified	Operator coached
11/18/2019	159088	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Verified	Operator Retrained
11/25/2019	159576	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed	Not enough information provided to follow up
11/27/2019	159876	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Verified	No action taken - Investigation found no fault in UTA employee
12/4/2019	160333	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Verified	Operator coached - Racial allegations not supported
12/14/2019	161365	Customer stated they were treated poorly due to protected status	Color	Did not specify	Closed - Not at Fault	Not enough information provided to follow up
12/16/2019	161499	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Verified	Operator Coached
12/18/2019	161695	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed - Verified	Operator Coached
12/26/2019	162172	Customer stated they were treated poorly due to protected status	Race	Did not specify	Closed	No action taken - Unable to corroborate customer account.
10/24/2019	157144	Customer stated they were treated poorly due to protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
10/25/2019	157314	Customer stated they were treated poorly due to protected status	National Origin	Did not specify	Closed	Not enough information provided to follow up

2020 Complaints

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
1/17/2020	163989	Passed by - Allegedly due to protected status	Color	Did not specify	Closed - Not at Fault	No action taken – Not enough customer information provided.
2/8/2020	166093	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
2/11/2020	166297	Customer stated they were treated poorly due to their protected status	National Origin	Arabic	Closed	Clarification offered - Customer misunderstood route alignment
2/14/2020	166651	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Verified	No action taken - Operator addressed safety concerns
2/18/2020	166905	Customer stated operator was treating another passenger poorly due to their protected status	Race	Black/African American	Closed - Not Verified	No action taken - Unable to corroborate customer account.
2/21/2020	167191	Customer stated operator was treating another passenger poorly due to their protected status	Color	Black/African American	Closed - Verified	No action taken - Operator addressed safety concerns
2/21/2020	167137	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Not at Fault	No action taken – Not enough customer information provided.
2/24/2020	167348	Customer stated they were treated poorly due to their protected status	National Origin	Did not specify	Closed	No action taken – Not enough customer information provided.
2/27/2020	167676	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	Operator coached regarding public perception
2/28/2020	167783	Customer stated they were treated poorly due to their protected status	Color	Did not specify	Closed - Not Verified	No action taken - Unable to corroborate customer account.
3/3/2020	168007	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
3/7/2020	168356	Passed by - Allegedly due to protected status	Color	Did not specify	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
3/13/2020	168876	Customer stated they were treated poorly due to their protected status	National Origin	Arabic	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
3/31/2020	169598	Customer felt that a police ticket was given as a result of a protected class	Color	Did not specify	Closed	No action taken - Unable to corroborate customer account.
3/31/2020	169586	Fare dispute reportedly caused by customer's protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
4/10/2020	169970	Customer alleged the operator used a racial slur	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account upon review of video



Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
4/17/2020	170227	Fare dispute reportedly caused by customer's protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
4/28/2020	170558	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
5/1/2020	170711	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
5/15/2020	171269	Customer stated they were treated poorly due to their protected status	Race	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
5/27/2020	171717	Customer stated operator was treating other passengers poorly due to their protected status	Color	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
5/28/2020	171772	Fare dispute reportedly caused by customer's protected status	Race	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
6/1/2020	171912	Customer stated they were treated differently	Race	Did not Specify	Closed	No action taken
6/3/2020	172037	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Verified	Operator coached
6/10/2020	172254	Customer states that Operator shared discriminatory views and language	Race	Black/African American	Closed - Not Verified	Operator coached
6/13/2020	172423	Customer refused service due to their protected status	Race	Black/African American	Closed - Verified	Operator coached
6/13/2020	172420	Fare dispute reportedly caused by customer's protected status	Race	White	Closed	No action taken – Not enough customer information provided.
6/15/2020	172490	Customer stated they were treated poorly due to their protected status	National Origin	Did not specify	Closed	No action taken – Not enough customer information provided.
6/15/2020	172465	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Verified	Operator coached
6/20/2020	172737	Customer stated operator treated them poorly due to their protected status	Race	Black/African American	Closed - Not Verified	Operator coached
6/23/2020	172814	Fare dispute reportedly caused by customer's protected status	Race	Black/African American	Closed - Not Verified	No action taken - Investigation found no fault in UTA employee
6/27/2020	173063	Customer stated operator was treating another passenger poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
6/27/2020	173058	Passed by - Allegedly due to protected status	Race	Black/African American	Closed	No action taken – Not enough customer information provided.
6/29/2020	173093	Customer stated operator treated them poorly due to their protected status	National Origin	Did not specify	Closed - Not at Fault	No action taken - Operator addressed safety concerns

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
6/30/2020	173172	Customer stated operator was harassing and threatening them due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
6/30/2020	173174	Customer stated operator was harassing and threatening them due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
6/30/2020	173183	Customer stated operator was harassing and threatening them due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
7/14/2020	173868	Passed by - Allegedly due to protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
7/21/2020	174171	Customer stated operator treated them poorly due to their protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
7/22/2020	174221	Customer stated operator was harassing them due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
7/27/2020	174395	Customer stated operator treated them poorly due to their protected status	Race	White	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
7/28/2020	174488	Passed by - Allegedly due to protected status	Race	White	Closed	No action taken - Investigation found no fault in UTA employee
7/29/2020	174571	Customer stated operator was harassing and threatening them due to their protected status	Race	Hispanic/Latino	Closed - Verified	Operator coached
7/29/2020	174571	Customer stated operator was harassing and threatening them due to their protected status	National Origin	Hispanic/Latino	Closed - Verified	Operator put on Performance Agreement
7/30/2020	174635	Customer stated operator was treating other passengers poorly due to their protected status	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
8/6/2020	175046	Customer stated operator treated them poorly due to their protected status	Race	Did not specify	Closed - Verified	Operator coached
8/7/2020	175068	Customer stated operator treated them poorly due to their protected status	Race	Did not specify	Closed - Verified	Operator coached
8/10/2020	175159	Customer stated there was a fare dispute based on their protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
8/13/2020	175422	Customer stated operator treated them poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
8/14/2020	175472	Customer stated there was a fare dispute based on their protected status	Race	Did not specify	Closed	Customer educated on fare payment
8/18/2020	175647	Customer stated they were refused service due to their protected status	National Origin	Hispanic/Latino	Closed - Verified	Operator coached

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
8/20/2020	175763	Customer stated Operator was making general discriminatory comments	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
8/20/2020	175804	Customer stated Operator was making general discriminatory comments	Race	Did not specify	Closed	No action taken – Not enough customer information provided.
8/20/2020	175773	Customer stated that they were discriminated against on mask enforcement	Race	Did not specify	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
9/4/2020	176579	Customer stated operator was treating other passengers poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
9/4/2020	176622	Customer stated operator treated them poorly due to their protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
9/15/2020	177098	Customer stated operator treated them poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
9/16/2020	177121	Customer stated that they were discriminated against on mask enforcement	Race	Did not specify	Closed	Operator coached
9/19/2020	177306	Customer stated operator treated them poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
9/20/2020	177308	Customer stated employee treated them poorly due to their protected status	National Origin	Hispanic/Latino	Closed	Employee Coached
9/21/2020	177360	Fare dispute reportedly caused by customer's protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
9/30/2020	177806	Customer stated operator treated them poorly due to their protected status	Color	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
9/30/2020	177782	Customer stated that they were discriminated against on mask enforcement	Race	Did not specify	Closed - Not at Fault	Operator coached - Unrelated to Title VI aspect
10/2/2020	177940	Customer stated that they were discriminated against on mask enforcement	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
10/2/2020	177934	Fare dispute reportedly caused by customer's protected status	Race	White	Closed - Not at Fault	No action taken - Unable to corroborate customer account.



2021 Complaints

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
1/7/2021	182163	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed	No action taken – No customer information provided.
1/14/2021	182485	Fare dispute reportedly caused by customer's protected status	Race	Black/African American	Closed	Customer educated on fare payment
1/19/2021	182669	Passed by - Allegedly due to protected status	National Origin	Hispanic/Latino	Closed	Vehicle Location history showed the stop was serviced
1/23/2021	182885	Customer stated they were denied service due to their protected status	Color	Did not specify	Closed - Not Verified	No action taken - Investigation found no fault in UTA employee
1/26/2021	183015	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	Not enough information provided to follow up
1/28/2021	183121	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
2/20/2021	184162	Customer stated they were denied service due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
3/3/2021	184631	Fare dispute reportedly caused by customer's protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
3/9/2021	184899	Customer stated the operator did not kneel the bus for her	Race	Native American	Closed - Not at Fault	No action taken - Investigation found the customer did not ask for the bus to be kneeled
3/9/2021	184890	Customer alleged the operator used a racial slur	National Origin	Hispanic/Latino	Closed - Not Verified	No action taken - Video contradicted customer account.
3/10/2021	184916	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not at Fault	No action taken - No customer at stop
3/26/2021	185678	Customer stated they were treated poorly due to their protected status	Race	Native American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
3/26/2021	185668	Customer stated they were treated poorly due to their protected status	Race	Asian	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
3/29/2021	185742	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
4/7/2021	186182	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Verified	Operator coached
4/8/2021	186249	Customer stated they were denied service due to their 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
4/9/2021	186284	Customer alleged the operator used a racial slur	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
4/19/2021	186730	Customer stated they were treated poorly due to their protected status	Color	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
4/19/2021	186699	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
4/28/2021	187219	Customer stated they were treated poorly due to their protected status	Race	Asian	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
4/29/2021	187269	Customer alleged that riders on the bus were discriminatory, and the operator did not intervene	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
5/3/2021	187408	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Verified	Operator coached
5/8/2021	187731	Customer stated they were treated poorly due to their protected status	Race	Asian	Closed - Not at Fault	Operator coached
5/11/2021	187854	Customer alleged they were told to stop speaking a language other than English	National Origin	Did not specify	Closed - Not at Fault	No action taken - Video contradicted customer account.
5/12/2021	187895	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Verified	Operator coached
5/14/2021	187973	Passed by - Allegedly due to protected status	Race	Indian	Closed - Not at Fault	No action taken - No customer at stop
5/15/2021	188022	Customer stated that they were discriminated against on mask enforcement	Race	Did not specify	Closed - Verified	Operator coached
5/18/2021	188145	Customer stated they were treated differently due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
5/18/2021	188117	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Verified	No action taken - No customer at stop
5/20/2021	188287	Passed by - Allegedly due to protected status	National Origin	Hispanic/Latino	Closed - Verified	Temporary stop caused confusion and customer was passed
5/31/2021	188811	Passed by - Allegedly due to protected status	Race	Did not specify	Closed - Not at Fault	No action taken - No customer at stop
5/31/2021	188808	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
6/5/2021	189125	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
6/7/2021	189194	Fare dispute reportedly caused by customer's protected status	National Origin	Hispanic/Latino	Closed	Not enough information provided to follow up
6/10/2021	189415	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Verified	Operator coached
6/25/2021	190254	Customer stated they were treated poorly due to their protected status	Color	Did not specify	Closed	Not enough information provided to follow up
6/29/2021	190406	Customer stated that they were discriminated against on mask enforcement	National Origin	Hispanic/Latino	Closed	No action taken - Investigation found no fault in UTA employee
7/2/2021	190646	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Verified	Operator coached
7/2/2021	190593	Customer stated that they were discriminated against on mask enforcement	Race	Did not specify	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
7/14/2021	191255	Passed by - Allegedly due to protected status	Race	Black/African American	Closed	No action taken - No customer at stop
7/19/2021	191476	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Not Verified	Operator coached
7/23/2021	191760	Fare dispute reportedly caused by customer's protected status	Race	White	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
7/27/2021	191957	Fare dispute reportedly caused by customer's protected status	Race	Black/African American	Closed - Not at Fault	No action taken - No customer at stop
7/28/2021	191998	Fare dispute reportedly caused by customer's protected status	Race	Did not specify	Closed - Not at Fault	No action taken - No customer at stop
7/30/2021	192164	Customer stated they were denied service due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
8/2/2021	192304	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed	Not enough information provided to follow up
8/2/2021	192287	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not Verified	Not enough information provided to follow up
8/12/2021	192890	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
8/24/2021	193632	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
8/25/2021	193766	Customer stated they heard an operator threatening BLM protestors	Race	Black/African American	Closed	Complaint was regarding an alleged incident months prior with no information to investigate



Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
8/26/2021	193807	Customer stated that they were discriminated against on mask enforcement	Race	Black/African American	Closed	Not enough information provided to follow up
8/27/2021	193957	Fare dispute reportedly caused by customer's protected status	National Origin	Did not specify	Closed - Not at Fault	No action taken - Video contradicted customer account.
9/6/2021	194504	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Not at Fault	Not enough information provided to follow up
9/7/2021	194533	Customer stated that they were discriminated against on mask enforcement	Race	Did not specify	Closed	No action taken - Investigation found no fault in UTA employee
9/18/2021	195354	Customer stated that they were discriminated against on mask enforcement	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
9/25/2021	195845	Customer alleged the operator used a racial slur	Race	Black/African American	Closed	Not enough information provided to follow up
9/27/2021	195895	Customer alleged the operator used a racial slur	Race	Black/African American	Closed	Not enough information provided to follow up
9/28/2021	195982	Passed by - Allegedly due to protected status	Race	Native American	Closed - Verified	Customer was not facing the stop and operator assumed they were not waiting for the bus
10/19/2021	197297	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Video contradicted customer account.
11/1/2021	198051	Customer stated they were treated poorly due to their protected status	Race	White	Closed - Not Verified	No action taken - Investigation found no fault in UTA employee
11/9/2021	198522	Fare dispute reportedly caused by customer's protected status	Color	Did not specify	Closed	No action taken - Investigation found no fault in UTA employee
11/9/2021	198473	Customer used foul language and denied service reportedly due to protected status	Race	Did not specify	Closed - Verified	No action taken - Investigation found no fault in UTA employee
11/14/2021	198769	Fare dispute reportedly caused by customer's protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
11/15/2021	198832	Customer stated that they were discriminated against on mask enforcement	National Origin	Did not specify	Closed - Not at Fault	No action taken - Video contradicted customer account.
11/19/2021	199134	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed	Not enough information provided to follow up
11/20/2021	199155	Customer stated they were treated poorly due to their protected status	Race	Native American	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
11/22/2021	199224	UTA Maintenance vehicle operator reportedly asked why complainant was not in a shelter	Race	Native American	Closed - Not Verified	Not enough information provided to follow up



Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
11/24/2021	199313	Alleged discrimination in fare enforcement	Race	Black/African American	Closed	Not enough information provided to follow up
11/30/2021	199563	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
12/23/2021	200839	Customer stated that another passenger was using racial slurs	Race	White	Closed	No UTA train hosts were in the area to address the concern at the time
1/7/2021	182163	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed	No action taken – No customer information provided.
1/14/2021	182485	Fare dispute reportedly caused by customer's protected status	Race	Black/African American	Closed	Customer educated on fare payment
1/19/2021	182669	Passed by - Allegedly due to protected status	National Origin	Hispanic/Latino	Closed	Vehicle Location history showed the stop was serviced
1/23/2021	182885	Customer stated they were denied service due to their protected status	Color	Did not specify	Closed - Not Verified	No action taken - Investigation found no fault in UTA employee
1/26/2021	183015	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Not at Fault	Not enough information provided to follow up
1/28/2021	183121	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
2/20/2021	184162	Customer stated they were denied service due to their protected status	National Origin	Hispanic/Latino	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
3/3/2021	184631	Fare dispute reportedly caused by customer's protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
3/9/2021	184899	Customer stated the operator did not kneel the bus for her	Race	Native American	Closed - Not at Fault	No action taken - Investigation found the customer did not ask for the bus to be kneeled
3/9/2021	184890	Customer alleged the operator used a racial slur	National Origin	Hispanic/Latino	Closed - Not Verified	No action taken - Video contradicted customer account.
3/10/2021	184916	Passed by - Allegedly due to protected status	Race	Black/African American	Closed - Not at Fault	No action taken - No customer at stop
3/26/2021	185678	Customer stated they were treated poorly due to their protected status	Race	Native American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
3/26/2021	185668	Customer stated they were treated poorly due to their protected status	Race	Asian	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee

Date Feedback Recorded	Report #	Summary of Complaint	Basis of Complaint	Race/Color/National Origin	Status	Action Taken
3/29/2021	185742	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
4/7/2021	186182	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Verified	Operator coached
4/8/2021	186249	Customer stated they were denied service due to their protected status	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
4/9/2021	186284	Customer alleged the operator used a racial slur	Race	Black/African American	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
4/19/2021	186730	Customer stated they were treated poorly due to their protected status	Color	Did not specify	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
4/19/2021	186699	Customer stated they were treated poorly due to their protected status	Race	Did not specify	Closed - Not at Fault	No action taken - Unable to corroborate customer account.
4/28/2021	187219	Customer stated they were treated poorly due to their protected status	Race	Asian	Closed - Not at Fault	No action taken - Investigation found no fault in UTA employee
4/29/2021	187269	Customer alleged that riders on the bus were discriminatory, and the operator did not intervene	Race	Black/African American	Closed	No action taken - Unable to corroborate customer account.
5/3/2021	187408	Customer stated they were treated poorly due to their protected status	National Origin	Hispanic/Latino	Closed - Verified	Operator coached
5/8/2021	187731	Customer stated they were treated poorly due to their protected status	Race	Asian	Closed - Not at Fault	Operator coached
5/11/2021	187854	Customer alleged they were told to stop speaking a language other than English	National Origin	Did not specify	Closed - Not at Fault	No action taken - Video contradicted customer account.
5/12/2021	187895	Customer stated they were treated poorly due to their protected status	Race	Black/African American	Closed - Verified	Operator coached
5/14/2021	187973	Passed by - Allegedly due to protected status	Race	Indian	Closed - Not at Fault	No action taken - No customer at stop
5/15/2021	188022	Customer stated that they were discriminated against on mask enforcement	Race	Did not specify	Closed - Verified	Operator coached

ATTACHMENT E – TITLE VI COMPLIANCE POLICY

UTAH TRANSIT AUTHORITY POLICY

No. UTA.01.06

TITLE VI COMPLIANCE

1) Purpose.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or National Origin in any program or activity that receives Federal funds or other Federal financial assistance. 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 provision of public transit services.

2) Definitions.

“25 Percent or Greater Change in Route Alignment” means a change to a route’s alignment, whether an addition of mileage or a removal of mileage, that exceeds 25 percent of the original route’s mileage. Where changes may include a removal and an addition of mileage in different areas of the route, the changes will be considered cumulatively. e.g., if 10 percent of the route is removed and an additional 15 percent is added in another area, this would equal a 25 percent route alignment change.

“Addition of Service” means the creation of a new bus route or the opening of a new rail line.

“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.

“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” refers to a neutral policy or practice that disproportionately affects Low-income Populations more than non-Low-income Populations.

“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”.

“Title VI Equity Briefing or Equity Briefing” means a document produced the Civil Rights Department that examines proposed changes for inequity using an abbreviated process to document Title VI considerations. This briefing is presented to the UTA Board of Trustees for approval but does not carry the same in-depth components of a Title VI Equity Analysis. Some items not present may include a title page, Title VI objectives and introduction, definitions page, etc.

“Title VI Circular” refers to FTA’s Title VI Circular 4702.1B

“UTA” means Utah Transit Authority.

3) 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. Major Change Policy
 - 1. UTA will seek public input on the following types of changes. These changes will be considered “Major Changes” which require an Equity Analysis or Equity Briefing 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 percent) 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 percent) 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 UTA policy requirements regarding public input opportunities as referenced below, and a demographic analysis of the population(s) effected, 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 Equity Analysis of Service and Fare Changes

1. UTA will analyze proposed Major Changes to service and any proposed Fare Change in accordance with FTA's Circular 4702.1B as amended.
 2. UTA Fares and Service Planning will involve Civil Rights compliance staff during early planning phases of any proposed major change. Civil Rights compliance staff will review proposals and determine what level of analysis is appropriate for the type of change proposed. This review will be conducted with the assistance of the departments proposing the change, but Civil Rights compliance staff will make the final determination on what level of analysis is required.
 3. UTA will evaluate the impacts of major service changes individually and cumulatively when there is more than one route being affected for a service change period. Dependent on the size and type of proposed changes, UTA may evaluate groups of similar changes together and in such a way as to evaluate the actual positive and negative impacts.
 4. UTA will primarily utilize the most recent American Community Survey (ACS) or Census Data available, 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.
 5. 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 and/or Bus Rapid Transit station and three miles to a commuter rail station.
 6. UTA will include in each equity analysis or equity briefing an explanation of what datasets were used.
- 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 five percent will be used to determine Disparate Impact on minority populations and Disproportionate Burden on Low-income Populations. This five percent 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 negatively impacts minority or Low-income Populations more than five percent than 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.

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

1. 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. Title VI Complaint Process

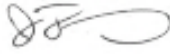
1. Any person who makes a complaint through the Civil Rights Complaint Form relating to Discrimination in receiving service from UTA based on race, color, or National Origin can fill out the complaint form and it will be investigated and responded to in a timely manner by the Civil Rights Office.
2. UTA has a Civil Rights Complaint Form which can be obtained from the Title VI Compliance Officer and on UTA's website. It can be downloaded in English or Spanish or be filled out utilizing an online form that will send an email to Civil Rights compliance staff.
3. Complaints that come to UTA through the Customer Service department will be received, recorded and responded to according to UTA Customer Communications policy and relevant SOPs.

4) Cross-References.


- Corporate Policy No. 1.1.6 Public Input Opportunities.
- Corporate Policy No. 5.1.1 Customer Communications,
- UTA Standard Operating Procedure No 5.1.1-1, Customer Communication Process,
- Corporate Policy 6.1.8. Equal Employment Opportunity, Anti-Discrimination Harassment, and Retaliation Polices
- Title VI of the Civil Rights Act of 1964
- FTA Circular 4702.1B

This UTA Policy was reviewed by UTA's Chief Officers on 04/06/2022, approved by the Board of Trustees on 5/25/2022 and approved by the Executive Director on 5/26/2022. This policy takes effect on the latter date.

DocuSigned by:

 Kim Shanklin, Chief People Officer
 Accountable Executive

DocuSigned by:

 Jay Fox
 Executive Director

Approved as to form and content:

DocuSigned by:

 Mike Bell
 Counsel for the Authority

History

Date	Action	Owner
05/22/2013	Adopted – Corporate Policy 1.1.28 – Title VI Compliance	Chief People Officer
05/17/2016	Revised – Corporate Policy 1.1.28 – Title VI Compliance	Chief People Officer
11/15/2016	Revised – Corporate Policy 1.1.28 – Title VI Compliance	Chief People Officer
5/26/2022	Rescinded – Corporate Policy 1.1.28 – Title VI Compliance	Chief People Officer
5/25/2022	Board Approved – UTA.01.06 – Title VI Compliance	Chief People Officer
5/26/2022	Adopted – UTA.01.06 – Title VI Compliance	Chief People Officer

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

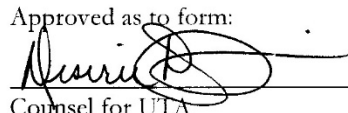
comment from the public on such proposals, arranging and conducting public hearings, compiling a public hearing record, and consideration of that record

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
Title: 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

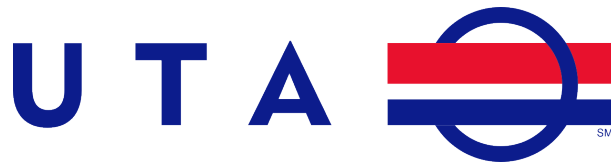
Approved as to form:



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. The most recent data available on this website was from 2015. 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	82,145	4.2%	72.3%
Chinese	4,780	0.2%	4.2%
Vietnamese	3,604	0.2%	3.2%
Other Pacific Island	2,530	0.1%	2.2%
Korean	1,755	0.1%	1.5%
Serbo-Croatian	1,711	0.1%	1.5%
Other Indic langs.	1,701	0.1%	1.5%
Other Asian langs.	1,488	0.1%	1.3%
African langs.	1,326	0.1%	1.2%
Tagalog	1,145	0.1%	1.0%
Russian	1,101	0.1%	1.0%
Portuguese	1,018	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	95.2%
Guatemala	80.8%
Honduras	88.5%
El Salvador	89.1%
Nicaragua	82.6%
Costa Rica	97.9%
Panama	95.7%
China	96.8%
Vietnam	95.8%
South Korea	97.9%

Source: CIA World Factbook & UNESCO

Although several Central American countries are listed above, the Spanish speaking population is not exclusively from these countries 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”. The question regarding proficiency in English was not answered by 82.5% of all surveyed which provides limited information on the whole of ridership. When respondents that refused to answer the question are eliminated, the LEP populations comprises 4.4% of all respondents. The previous on-board survey had 3.8% LEP populations which appears in line with the limited results received in this survey. In addition to English proficiency, UTA also asked if another language was spoken in the home. The survey showed that there are ninety-three languages spoken in the homes of 17.7% of all respondents showing a diversity of language within the area.

Table 3: LEP Customer Service Calls

	2019	2020	2021	3 Year Total	Percent of LEP Calls
Spanish	726	485	578	1,789	82.0%
Arabic	33	20	5	58	2.7%
Farsi (Persian)	7	4	3	14	0.6%
Mandarin	2	5	1	8	0.4%
French	2	2	3	7	0.3%
Vietnamese	2	2	2	6	0.3%
Russian	5	0	1	6	0.3%
Portuguese	3	1	1	5	0.2%
Burmese	3	0	2	5	0.2%
Sudanese	2	2	1	5	0.2%
Bosnian	3	0	0	3	0.1%
Swahili	2	1	0	3	0.1%
Chinese	1	0	1	2	0.1%
Korean	2	0	0	2	0.1%
Sundanese	1	0	0	1	0.0%
Turkish	0	0	1	1	0.0%
Samoan	1	0	0	1	0.0%
Urdu	0	0	1	1	0.0%
Nepali	1	0	0	1	0.0%
Tibetan	0	0	1	1	0.0%
Kirundi (Rundi)	1	0	0	1	0.0%
Croatian	0	0	1	1	0.0%
Dari	0	0	1	1	0.0%
Palauan	0	0	1	1	0.0%
Kinyarwanda	1	0	0	1	0.0%
Total LEP Calls:	798	522	604	1,924	

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 thirty-five 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 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.

Point to your language



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

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




Interpreter
801-RIDE-UTA
(801-743-3882)
Toll-Free (888-743-3882)

Intérprete 口譯 thông dịch viên
 해석사 tumač переводчик
 インタプリタ Dolmetscher مترجم

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 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

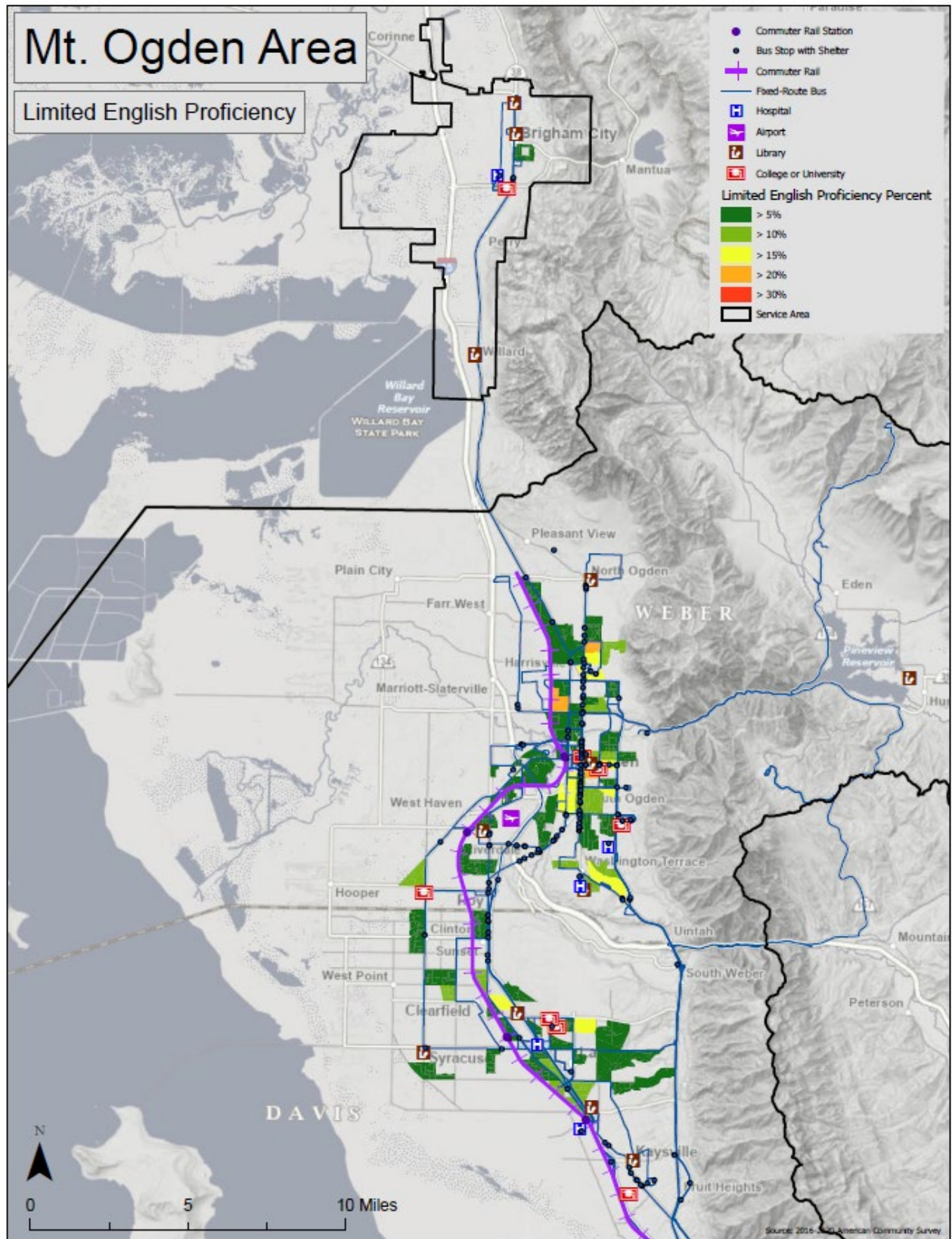
UTA will determine, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and how we might want to provide notice of any changes in services to the LEP public and to employees. UTA will also consider whether changes in demographics,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

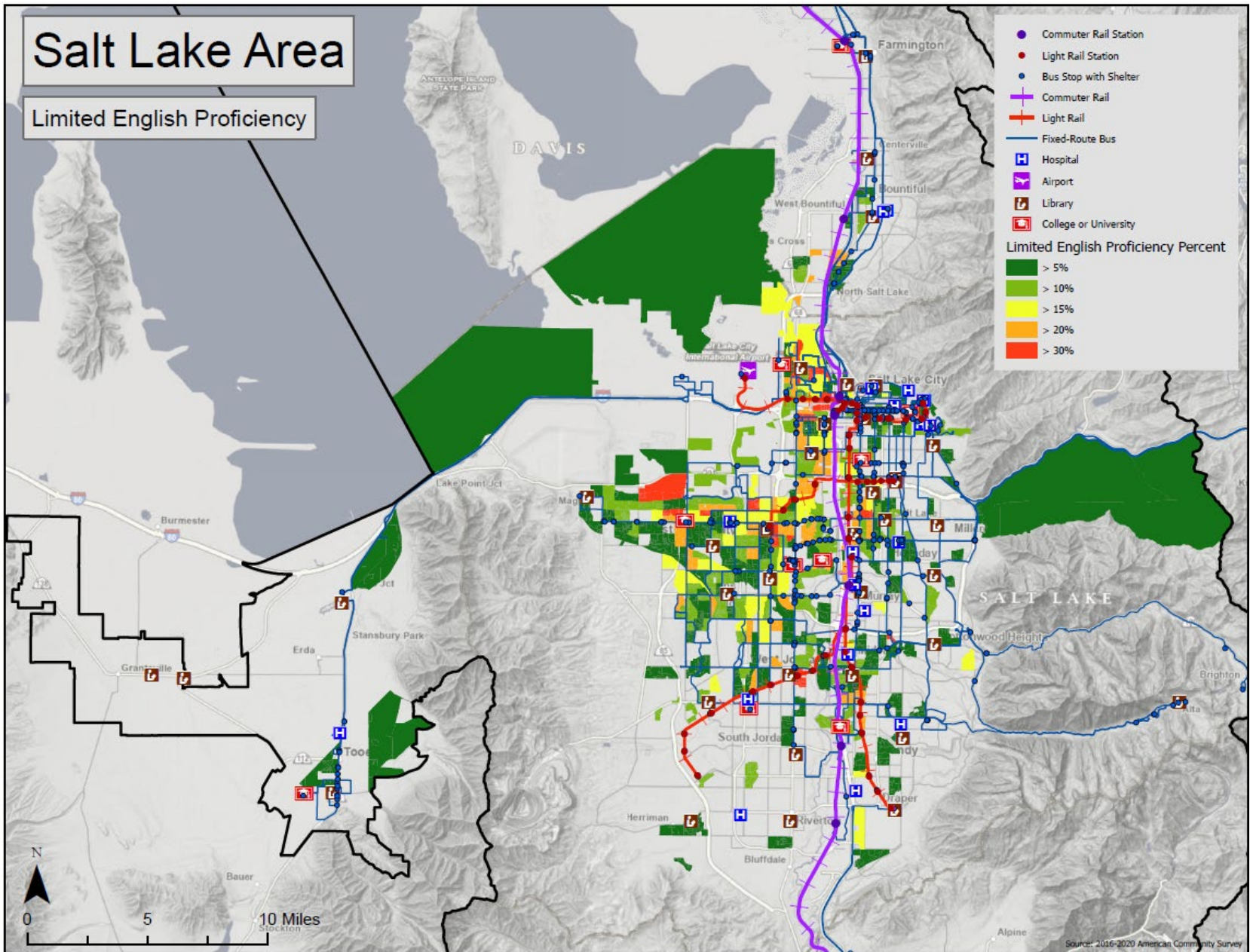
Evaluation of this LEP plan will help track UTA's outreach efforts, discover dissemination problems, make corrections, and find out whether language services provided have impacted UTA ridership and/or relations with local immigrant and other LEP communities. The results of this monitoring will help improve future efforts, as the LEP plan is meant to be an evolving document which will be updated as needed.

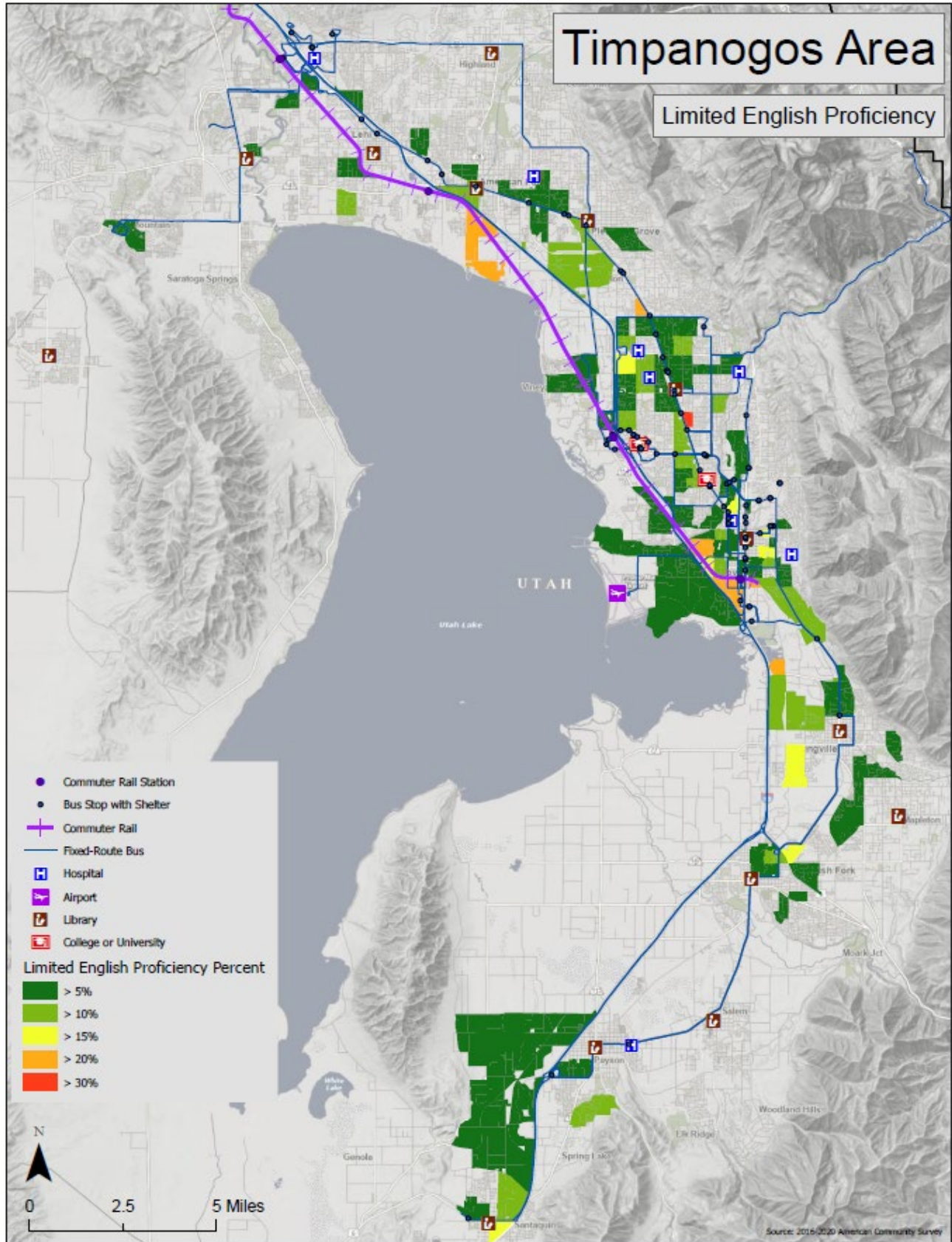
UTA has appointed a compliance officer to evaluate and monitor LEP services offered by UTA in conjunction with the relevant business units within UTA. The responsibilities of the Title VI Compliance Officer shall include reporting to the agency regarding the activities noted below.

- 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 2019 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 / Day Care (students only)
 - Medical Service / Hospital (non-work)
 - Shopping
 - Recreation / Sightseeing / Restaurant
 - Social Visit / Church
 - Personal business or errands
 - Airport (passengers only)
 - Your **HOME** → Go to Question #4
 - Your **HOTEL** / Place you are staying
 - 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 Wheelchair
 - Personal Bike Bike sharing – e.g. Green Bike
 - Was dropped off by someone (answer 4a)
 - Drove alone and parked (answer 4a)
 - Drove or rode with others and parked (answer 4a)
 - Taxi
 - Uber, Lyft, etc.
 - E-scooter – e.g., Bird, Lime, etc.
 - Other
- 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 / Day Care (students only)
 - Medical Service / Hospital (non-work)
 - Shopping
 - Recreation / Sightseeing / Restaurant
 - Social Visit / Church
 - Personal business or errands
 - Airport (passengers only)
 - Your **HOME** → Go to Question #8
 - Your **HOTEL** / Place you are staying
 - 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 Wheelchair
 - Personal Bike Bike sharing – e.g. Green Bike
 - 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
 - Uber, Lyft, etc.
 - E-scooter – e.g., Bird, Lime, etc.
 - Other
- 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. 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)

16. How did you pay your fare today?

<input type="radio"/> Token -----> <table border="1"> <tr><th colspan="2">Where did you get it?</th></tr> <tr> <td><input type="checkbox"/> UTA Customer Service Office</td> <td><input type="checkbox"/> Retail Outlet</td> </tr> <tr> <td><input type="checkbox"/> Human Service Agency</td> <td><input type="checkbox"/> Other</td> </tr> </table>	Where did you get it?		<input type="checkbox"/> UTA Customer Service Office	<input type="checkbox"/> Retail Outlet	<input type="checkbox"/> Human Service Agency	<input type="checkbox"/> Other	<input type="radio"/> Free Fare Zone - Downtown Trax and Bus														
Where did you get it?																					
<input type="checkbox"/> UTA Customer Service Office	<input type="checkbox"/> Retail Outlet																				
<input type="checkbox"/> Human Service Agency	<input type="checkbox"/> Other																				
<input type="radio"/> FAREPAY Card -----> <table border="1"> <tr> <td><input type="checkbox"/> Retail Location, Cash</td> <td><input type="checkbox"/> Online</td> </tr> <tr> <td><input type="checkbox"/> Retail Location, Credit/Debit</td> <td><input type="checkbox"/> Other</td> </tr> <tr> <td><input type="checkbox"/> School - Univ. of Utah</td> <td><input type="checkbox"/> School - Other</td> </tr> <tr> <td><input type="checkbox"/> School - Utah Valley Univ</td> <td><input type="checkbox"/> Employer</td> </tr> <tr> <td><input type="checkbox"/> School - Weber State</td> <td><input type="checkbox"/> Other</td> </tr> <tr> <td><input type="checkbox"/> School - BYU</td> <td></td> </tr> </table>	<input type="checkbox"/> Retail Location, Cash	<input type="checkbox"/> Online	<input type="checkbox"/> Retail Location, Credit/Debit	<input type="checkbox"/> Other	<input type="checkbox"/> School - Univ. of Utah	<input type="checkbox"/> School - Other	<input type="checkbox"/> School - Utah Valley Univ	<input type="checkbox"/> Employer	<input type="checkbox"/> School - Weber State	<input type="checkbox"/> Other	<input type="checkbox"/> School - BYU		<input type="radio"/> Mobile Phone (GoRide) -----> <table border="1"> <tr><th colspan="2">What ticket did you purchase?</th></tr> <tr> <td><input type="checkbox"/> Regular Monthly</td> <td><input type="checkbox"/> Ski</td> </tr> <tr> <td><input type="checkbox"/> Premium Monthly</td> <td><input type="checkbox"/> Day</td> </tr> <tr> <td><input type="checkbox"/> FrontRunner</td> <td></td> </tr> </table>	What ticket did you purchase?		<input type="checkbox"/> Regular Monthly	<input type="checkbox"/> Ski	<input type="checkbox"/> Premium Monthly	<input type="checkbox"/> Day	<input type="checkbox"/> FrontRunner	
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<input type="checkbox"/> School - Univ. of Utah	<input type="checkbox"/> School - Other																				
<input type="checkbox"/> School - Utah Valley Univ	<input type="checkbox"/> Employer																				
<input type="checkbox"/> School - Weber State	<input type="checkbox"/> Other																				
<input type="checkbox"/> School - BYU																					
What ticket did you purchase?																					
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<input type="radio"/> Electronic Card -----> <table border="1"> <tr> <td><input type="checkbox"/> UTA Online Website</td> <td><input type="checkbox"/> Retail Outlet</td> </tr> </table>	<input type="checkbox"/> UTA Online Website	<input type="checkbox"/> Retail Outlet	<input type="radio"/> TVM Ticket -----> <table border="1"> <tr> <td><input type="checkbox"/> Cash, One Way or Round Trip</td> <td><input type="checkbox"/> Cash, Other</td> </tr> <tr> <td><input type="checkbox"/> Credit/Debit - One Way or Round Trip</td> <td><input type="checkbox"/> Credit/Debit - Other</td> </tr> </table>	<input type="checkbox"/> Cash, One Way or Round Trip	<input type="checkbox"/> Cash, Other	<input type="checkbox"/> Credit/Debit - One Way or Round Trip	<input type="checkbox"/> Credit/Debit - Other														
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<input type="checkbox"/> Credit/Debit - One Way or Round Trip	<input type="checkbox"/> Credit/Debit - Other																				
<input type="radio"/> Monthly Paper Pass -----> <table border="1"> <tr> <td><input type="checkbox"/> Human Service Agency</td> <td><input type="checkbox"/> UTA Online Website</td> </tr> <tr> <td><input type="checkbox"/> UTA Customer Service Office</td> <td><input type="checkbox"/> Retail Outlet</td> </tr> </table>	<input type="checkbox"/> Human Service Agency	<input type="checkbox"/> UTA Online Website	<input type="checkbox"/> UTA Customer Service Office	<input type="checkbox"/> Retail Outlet	<input type="radio"/> Other																
<input type="checkbox"/> Human Service Agency	<input type="checkbox"/> UTA Online Website																				
<input type="checkbox"/> UTA Customer Service Office	<input type="checkbox"/> Retail Outlet																				
<input type="radio"/> Medicaid Punch Pass -----> <table border="1"> <tr><th colspan="2">What pass type is it?</th></tr> <tr> <td><input type="checkbox"/> H Pass (Horizon Cardholders)</td> <td></td> </tr> <tr> <td><input type="checkbox"/> A Pass (Adult Regular)</td> <td></td> </tr> <tr> <td><input type="checkbox"/> X Pass (Adult Premium)</td> <td></td> </tr> </table>	What pass type is it?		<input type="checkbox"/> H Pass (Horizon Cardholders)		<input type="checkbox"/> A Pass (Adult Regular)		<input type="checkbox"/> X Pass (Adult Premium)														
What pass type is it?																					
<input type="checkbox"/> H Pass (Horizon Cardholders)																					
<input type="checkbox"/> A Pass (Adult Regular)																					
<input type="checkbox"/> X Pass (Adult Premium)																					
<input type="radio"/> Cash on Bus																					

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, E-scooter, bike share, 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. How many children under age 5 are you traveling with today? _____ people

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

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

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

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

25. Do you have a disability? Yes No

25a. [If #25 is Yes] Does your disability limit your access to transportation? Yes No Prefer not to answer

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

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

28. What is your AGE? Under 16 16-17 18-24 25-34 35-44 45-54 55-64 65+

29. 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: _____	

30. What is your gender? Female Male Other

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

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

32. Which of the following BEST describes your TOTAL ANNUAL HOUSEHOLD INCOME in 2018 before taxes?

<input type="radio"/> Less than \$18,000	<input type="radio"/> \$32,000 - \$39,999	<input type="radio"/> \$60,000 - \$74,999	<input type="radio"/> \$150,000 - \$199,999
<input type="radio"/> \$18,000 - \$24,999	<input type="radio"/> \$40,000 - \$44,999	<input type="radio"/> \$75,000 - \$99,999	<input type="radio"/> \$200,000 - \$249,999
<input type="radio"/> \$25,000 - \$31,999	<input type="radio"/> \$45,000 - \$59,999	<input type="radio"/> \$100,000 - \$149,999	<input type="radio"/> \$250,000 or above

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

Your Name: _____

Phone Number: (____) _____

LEP CONSIDERATION IN SURVEYS

The previous document shows a graphic presentation of what the survey would look like if it were administered on paper. However, the survey was conducted entirely on tablets and collected electronically. The first screen is shown below and is designed for LEP individuals.

Select your language • 选择您的语言 • 選擇你的語言 • Seleccione su idioma • Chọn ngôn ngữ của bạn • 언어를 선택하십시오.

- 普通话 (CHINESE - MANDARIN)
- 廣東話 (CHINESE - CANTONESE)
- ESPAÑOL (SPANISH)
- Tiếng Việt (VIETNAMESE)
- 한국어 (KOREAN)
- REFUSED
- Other:

As shown above, the first question offers the respondent a chance to select their language. Subsequent screens are then in the language they selected, and the respondent is able to participate in the survey regardless of their language abilities. Routes where it was anticipated that there would be a high concentration of Spanish speaking riders had bilingual interviewers assigned to administer the survey directly.

It was determined that in order to keep data quality as high as possible that the survey would be conducted exclusively in person or over the phone. The language they selected would prompt them to provide their phone number as seen below. They would then get a call from a person able to interpret the rest of the survey and provide higher data quality.

Please enter your name and phone number so we can help you fill out this survey in your language.

(SPANISH) Por favor introduzca su nombre y teléfono para que podamos ayudarle a llenar esta encuesta en su idioma.

(CHINESE) 請輸入您的姓名和電話，以便我們幫助您用您的語言填寫調查問卷

(MANDARIN) 请输入您的姓名和电话，以便我们帮助您用您的语言填写调查问卷

(VIETNAMESE) Hãy điền tên và số điện thoại để chúng tôi có thể giúp bạn điền vào cuộc khảo sát này bằng ngôn ngữ của bạn.

(KOREAN) 이 설문 조사에 귀하의 언어로 기입 할 수 있도록 귀하의 이름과 전화 번호를 입력하십시오.

ATTACHMENT I – BOARD RESOLUTION ON TITLE VI PROGRAM

RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT AUTHORITY APPROVING THE TITLE VI PROGRAM FOR SUBMISSION TO THE FEDERAL TRANSIT ADMINISTRATION

R2022-05-04

May 25, 2022

WHEREAS, the Utah Transit Authority (the “Authority”) is a large 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, Title VI of the Civil Rights Act of 1964 states that no recipient of federal funds can be discriminatory on the basis of race, color, and national origin in the delivery of programs or services; and

WHEREAS, the Federal Transit Administration (FTA) requires transit agencies to submit a Title VI Program for their review and concurrence; and

WHEREAS, the Board is committed to ensuring individuals who benefit from our transit service are treated equitably and that their needs are considered and protected as service and fare changes are proposed, and as UTA delivers service everyday; and WHEREAS, the Board, in keeping with the requirements of the Federal Transit Administration (“FTA”) for public transit agencies and the Civil Rights Act of 1964 has considered and reviewed the Title VI Program prepared by Authority staff; and

WHEREAS, the Board has desires to approve the Title VI Program for submission to the FTA.

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

1. That the Title VI Program, as prepared by Authority staff, a copy of which is attached hereto as Exhibit A, is hereby approved.
2. That the Board hereby ratifies any and all actions taken by the Authority’s Executive Director, staff, and counsel 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.

R2022-05-04

Approved and adopted this 25th day of May 2021.

DocuSigned by:



Carlton Christensen, Chair
Board of Trustees

ATTEST:

DocuSigned by:



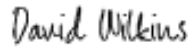
Secretary of the Authority



(Corporate Seal)

Approved As To Form:

DocuSigned by:



Legal Counsel

ATTACHMENT J – SERVICE AND FARE EQUITY ANALYSES

Included in this section are all the Service and Fare Equity Analyses conducted during calendar year 2019 through 2021. They include:

1. August 2019 Change Day Analysis.....	Page 1
2. Max Line TVM Fares Analysis.....	Page 45
3. April 2020 Change Day Analysis.....	Page 63
4. December 2020 Fares Analysis.....	Page 80
5. Low-Income Pilot Equity Briefing.....	Page 123
6. August 2021 Change Day Analysis.....	Page 129
7. December 2021 Change Day Analysis.....	Page 164

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE AUGUST 2019 CHANGE DAY
TITLE VI EQUITY ANALYSIS**

R2019-07-08

July 31, 2019

WHEREAS, the Utah Transit Authority (the "Authority") is a large 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 August 2019 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 2019 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 31st day of July 2019.



Carlton Christensen, Chair
Board of Trustees

ATTEST:

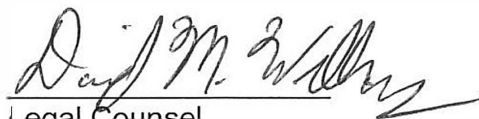


Robert K. Biles, Secretary/Treasurer



(Corporate Seal)

Approved As To Form:



Legal Counsel

Exhibit A



Title VI Service and Fare Equity Analysis

August 2019

Utah Transit Authority

Contents

Introduction	3
Summary of Proposed Changes	3
Summary of Findings.....	3
UTA Policy and Definitions.....	4
Definitions	4
Major Service Change	5
Evaluation and Analysis of Service and Fare Changes	6
Disparate Impact and Disproportionate Burden	6
Finding a Disparate Impact	6
Finding a Disproportionate Burden	7
Proposed Changes.....	8
Salt Lake Business Unit.....	8
Utah County	17
Weber & Davis Counties	21
Analysis of Proposed Changes	23
Analysis of Potential Impacts on Minority Populations	24
Analysis of Potential Impacts on Low-income Populations	30
System-Wide Impacts	37
Conclusion.....	38
Appendix A – August 2019 Change Day Public Comment Report	39

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 2019. 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

UTA is proposed to change 16 bus routes, one of which has a fares change. Seven routes are proposed to be discontinued, four would have alignments changed at greater than 25% of their current alignment, and it is proposed to add five new routes to the system.

Summary of Findings

In UTA's efforts to streamline the service it offers, the August 2019 Change Day proposal includes the discontinuation of many routes and the realignment of others in order to increase efficiency and frequency of service within the system. In so doing, there are areas of the system that will no longer have reasonable walk access to the system and some routes being discontinued serve areas with dense Title VI populations. The routes being discontinued serving Title VI populations have proposed replacements with greater frequency and/or will provide more direct routes. When looking at the system-wide impact of the proposed changes, and accounting for the proposed new routes, the demographics of those losing reasonable access are well below the system average and do not result in a disparate impact on minorities or disproportionate burden borne by low-income households.

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. *"Flex Route"* refers to a route that, upon request, can deviate from its fixed route to provide a curbside pick-up or drop-off of up to $\frac{3}{4}$ of a mile around the fixed route. Deviations from the fixed route cost an additional \$1.25.
- 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 2012-2016 5-year population estimates provided by the American Community Survey (ACS).

<i>Low-Income System Average:</i>	
Population:	2,275,313
Low-Income Population:	443,484
Percent Low-income:	19.5%

<i>Minority System Average:</i>	
Population:	2,310,052
Minority Population:	511,161
Percent Minority:	22.1%

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 service 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.

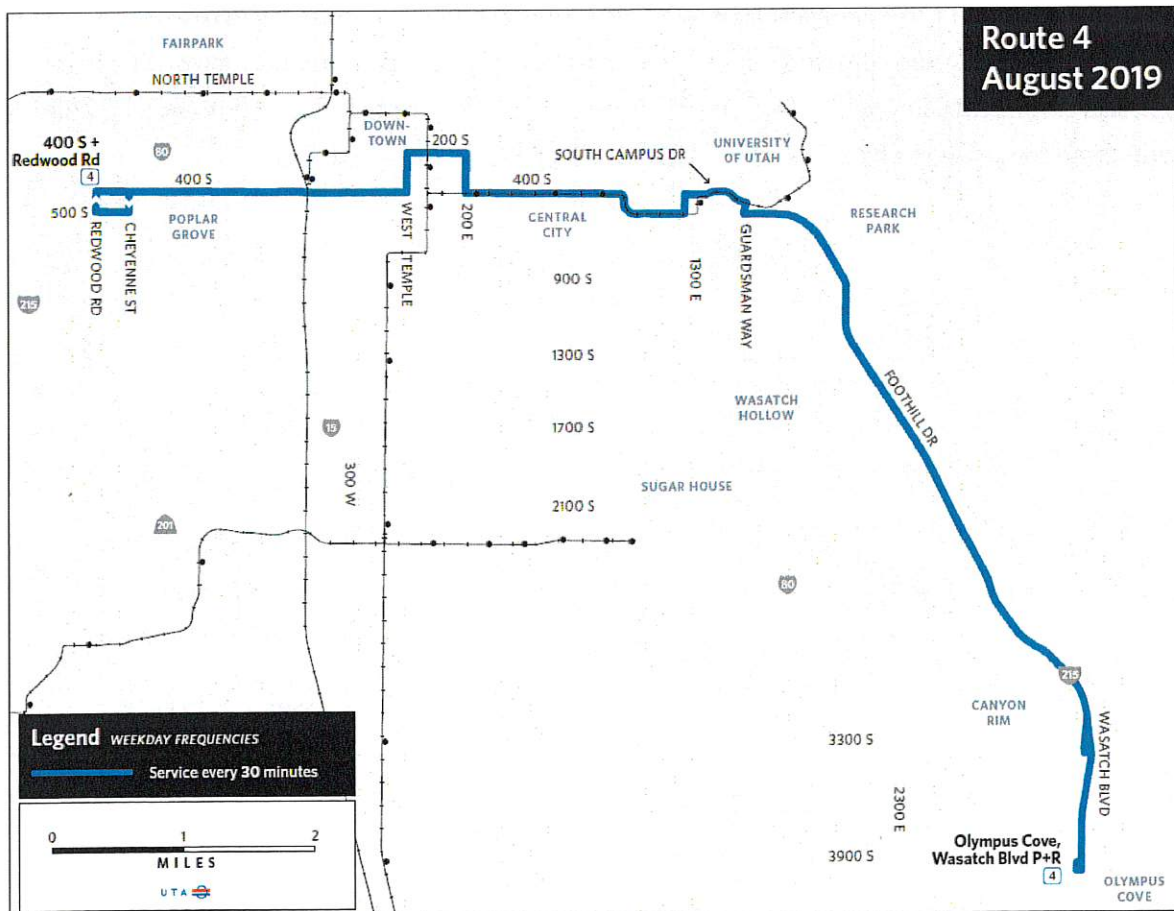
Proposed Changes

Salt Lake Business Unit

Route 4 – Addition of Route

UTA is proposing to add a new route, which would partially replace service currently provided by routes 228 and 516. The eastern terminal would be at 3900 South and Wasatch Boulevard. Route 4 would then travel north along Wasatch Blvd, Foothill Drive, 400 South, 200 South, and back to 400 south before ending at Redwood Road. The objective of this route would be to enhance east–west connectivity between the University of Utah, downtown Salt Lake, and the Poplar Grove. On the eastern end, route 4 is designed to connect with routes 33, 39, and 45. Route 4 will match the current span of service as route 516.

The addition of a new bus route meets UTA’s threshold for a major change.

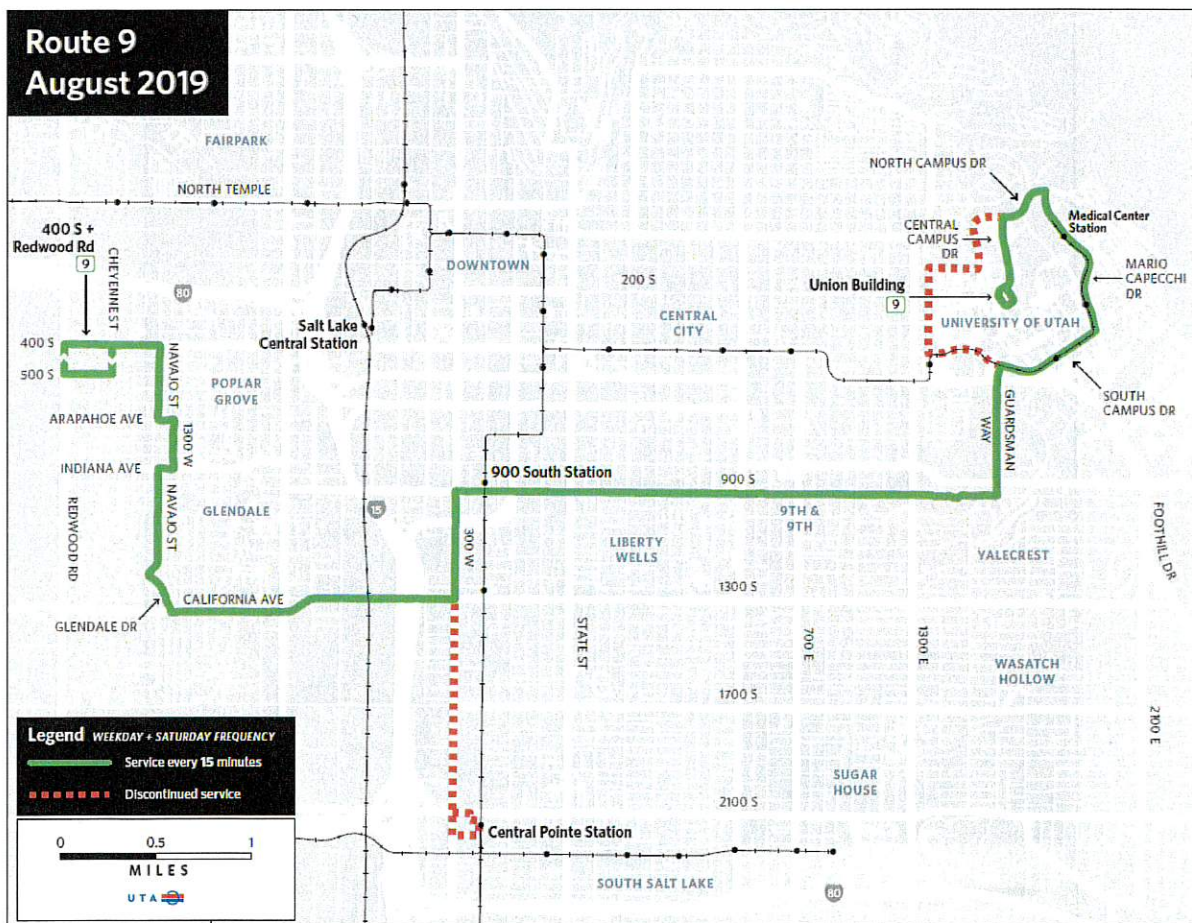


Route 9 – Change in Alignment

UTA is proposing to increase frequency on route 9, run earlier and later, and run on weekends. As we seek to make the route more efficient, it is proposed to eliminate service on much of 300 West leading to Central Pointe Station. As a result, weekday and Saturday headways would go from 30 minutes to 15 minutes from 6 am to 7 pm, as well as every 30 minutes from 5 am to 6 am and 7 pm to midnight. On Sundays, service would run every 30 min from 7 am to 7 pm.

Route 9 would replace the service that route 516 provides within the Glendale and Poplar Grove communities. The route’s western end would be located at 400 south and Redwood Road. On the eastern end, the route would end adjacent to the Student Union Building after servicing the University of Utah campus and hospitals.

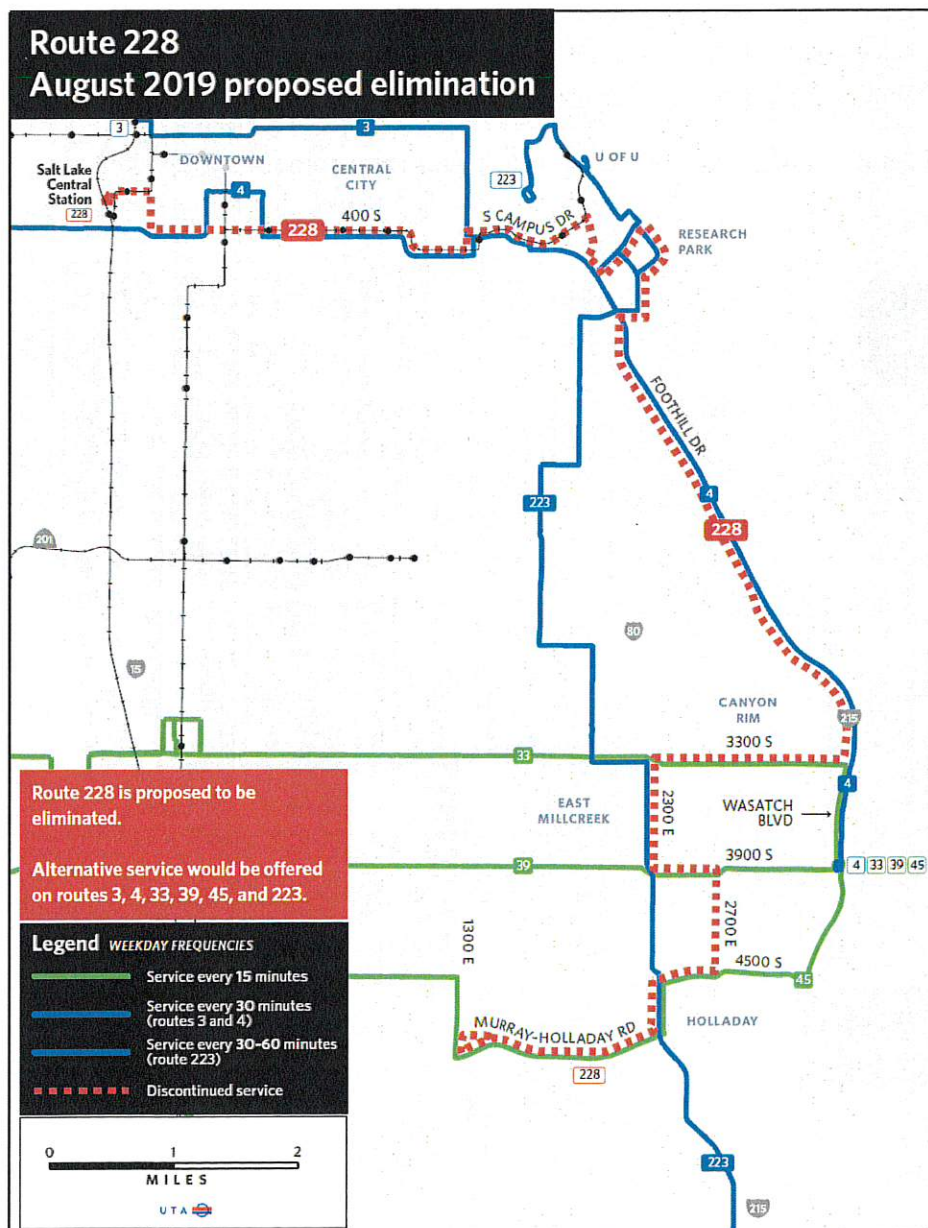
A change in alignment of 25% or greater meets UTA’s threshold for a major change.



228 – Discontinuation of Route

It is proposed to eliminate route 228. Route 228 is highly duplicative of the new route 4 that will be implemented as part of this change. Route 4 will run a higher level of service than current route 228. Segments of route 228 not covered by route 4 will be replaced by routes 33, 39, 45 and 223. All of the portions of the 228 that serve populations protected by Title VI will continue to be served by other routes, many of which with more frequent service.

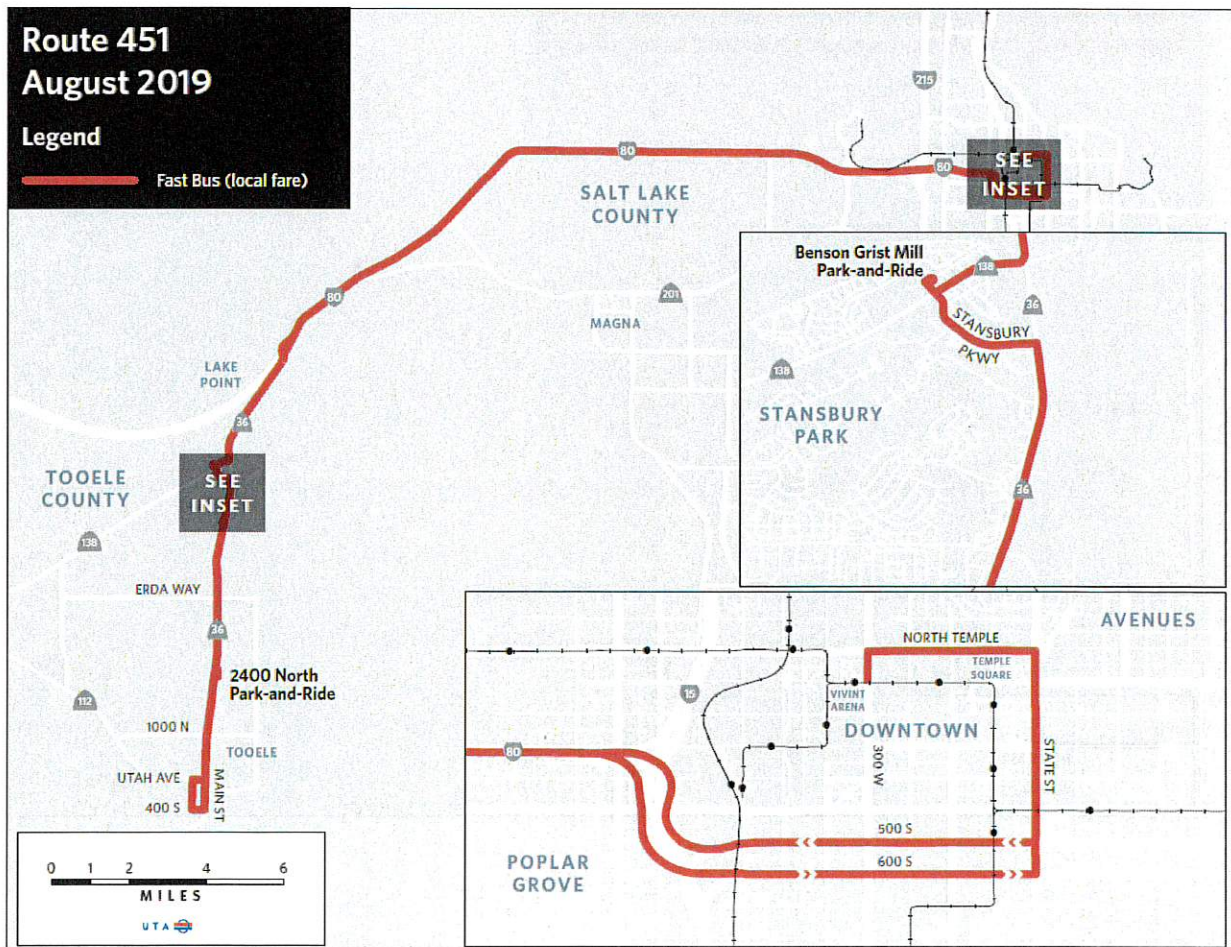
The elimination of a route meets UTA's threshold for a major change.



451 – Change in Fare

UTA has proposed to convert route 451 from an express line to a regular fare bus route. As a result, the route's fare would reduce from \$4.50 to \$2.50 for a one-way trip. Trip times during weekday rush hours would be adjusted to provide more options for commuters. Passengers traveling from Tooele would access Salt Lake International Airport, the International Center, or destinations along North Temple using a coordinated transfer with route 454 at Benson Grist Mill Park-and-Ride.

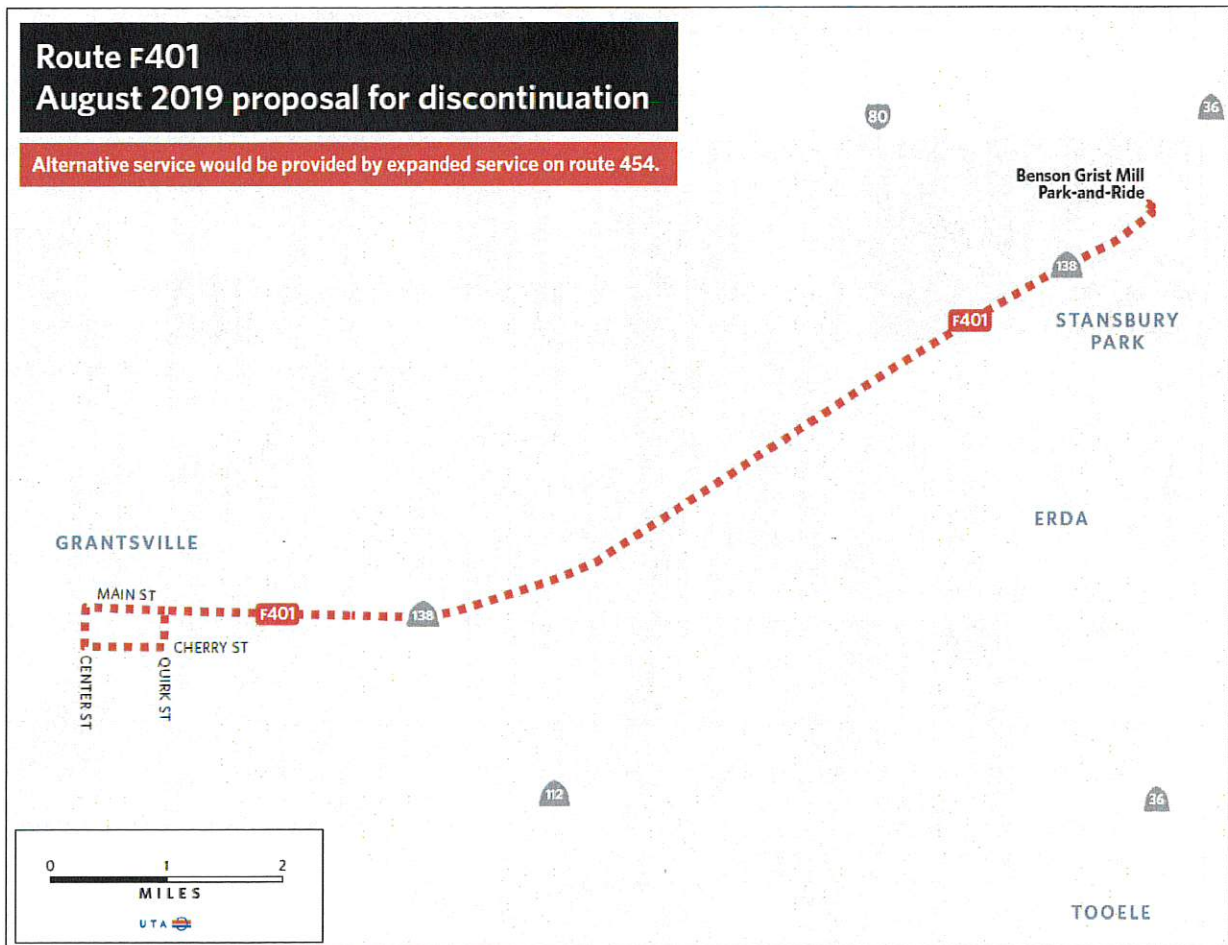
The fare change on this route would constitute a major change according to UTA policy.



F401 – Discontinuation of Route

UTA has proposed to discontinue route F401 and replace it with additional trips from Grantsville to Salt Lake City on route 454. The 454 travels much of the same route as F401 with the exception of offering deviations.

The elimination of a route meets UTA's threshold for a major change



453 – Discontinuation of Route

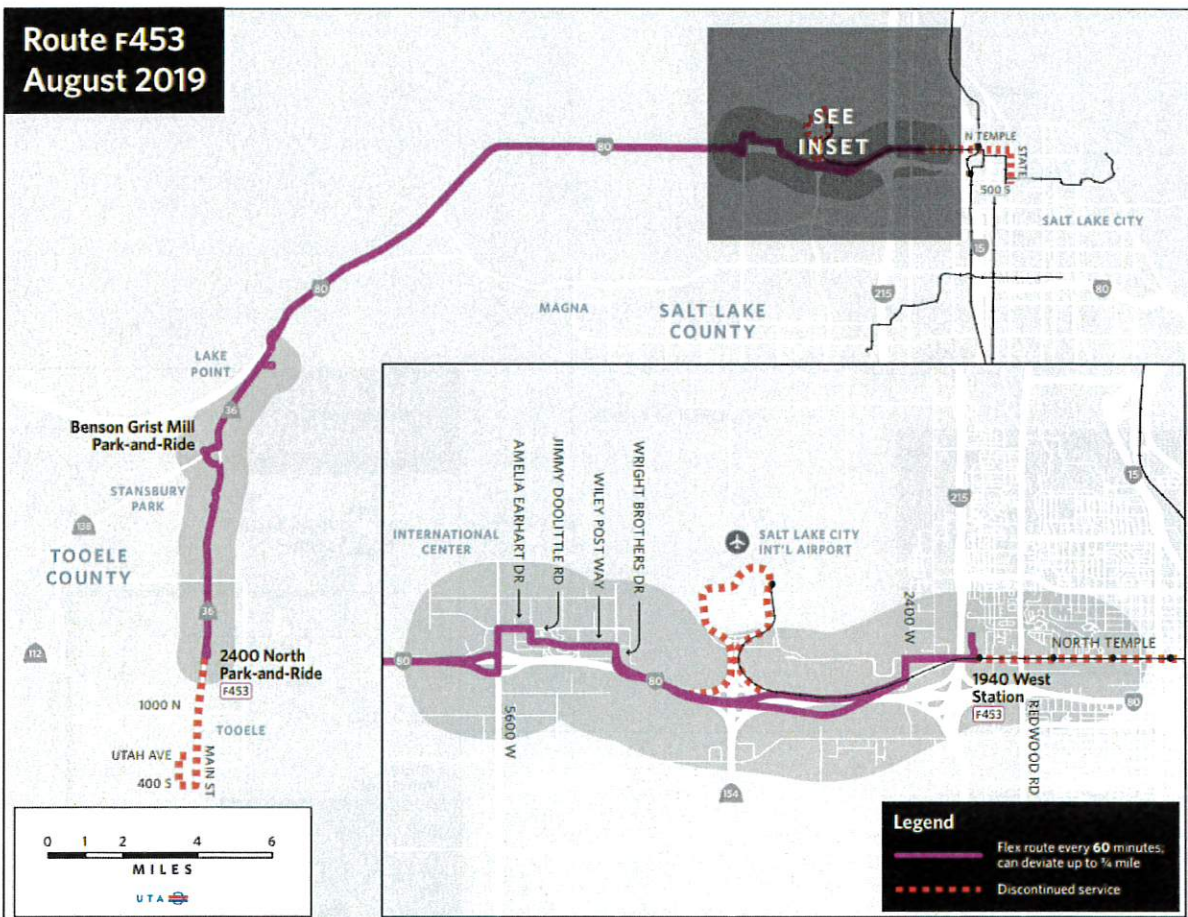
UTA would discontinue route 453 and replace it with route 451 service (at the regular local fare), additional trips on route 454, and midday service on the proposed new route F453. A map is shown below with an overlay of F453 with the discontinued portions depicted with a red dotted line.

The elimination of a route meets UTA's threshold for a major change

F453 – Addition of Route

The new proposed route F453, a midday Flex route between Tooele and Salt Lake City, would run every 60 minutes from the 2400 North Park-and-Ride in Tooele to Power Station on TRAX's Green Line. Service would be offered from approximately 8 am to 4 pm while routes 451 and 454 would not be operating.

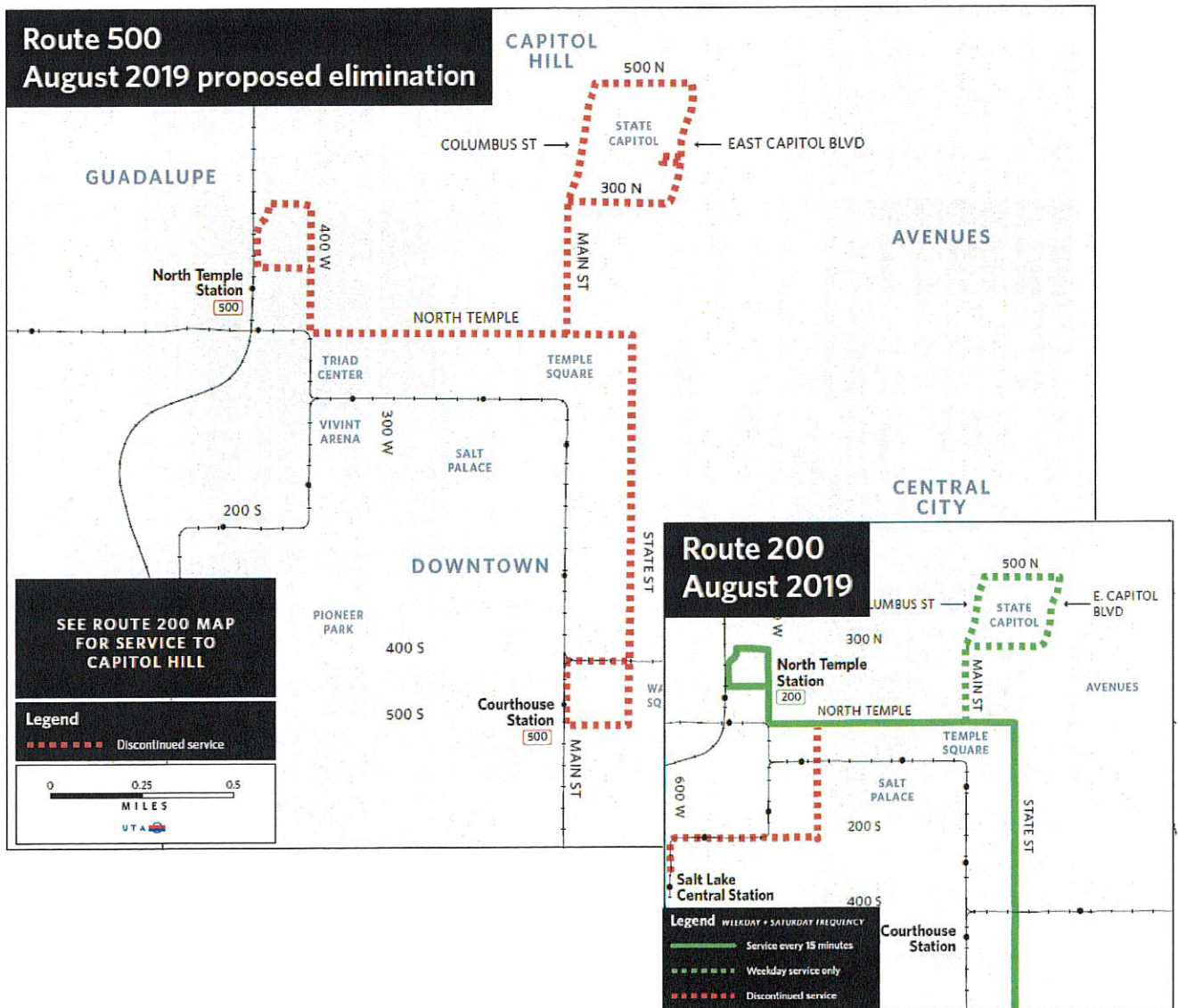
The addition of a new bus route meets UTA's threshold for a major change.



500 – Discontinuation of Route

UTA has proposed to discontinue route 500 and replace it with route 200. This route was designed to provide transportation to the State Capitol Building. Capitol Hill would receive 15-minute service Monday through Friday from route 200, which is more frequent than the 30 minute service currently offered, but in a more cost effective way. The only difference in alignment is a connection to the Courthouse TRAX Station.

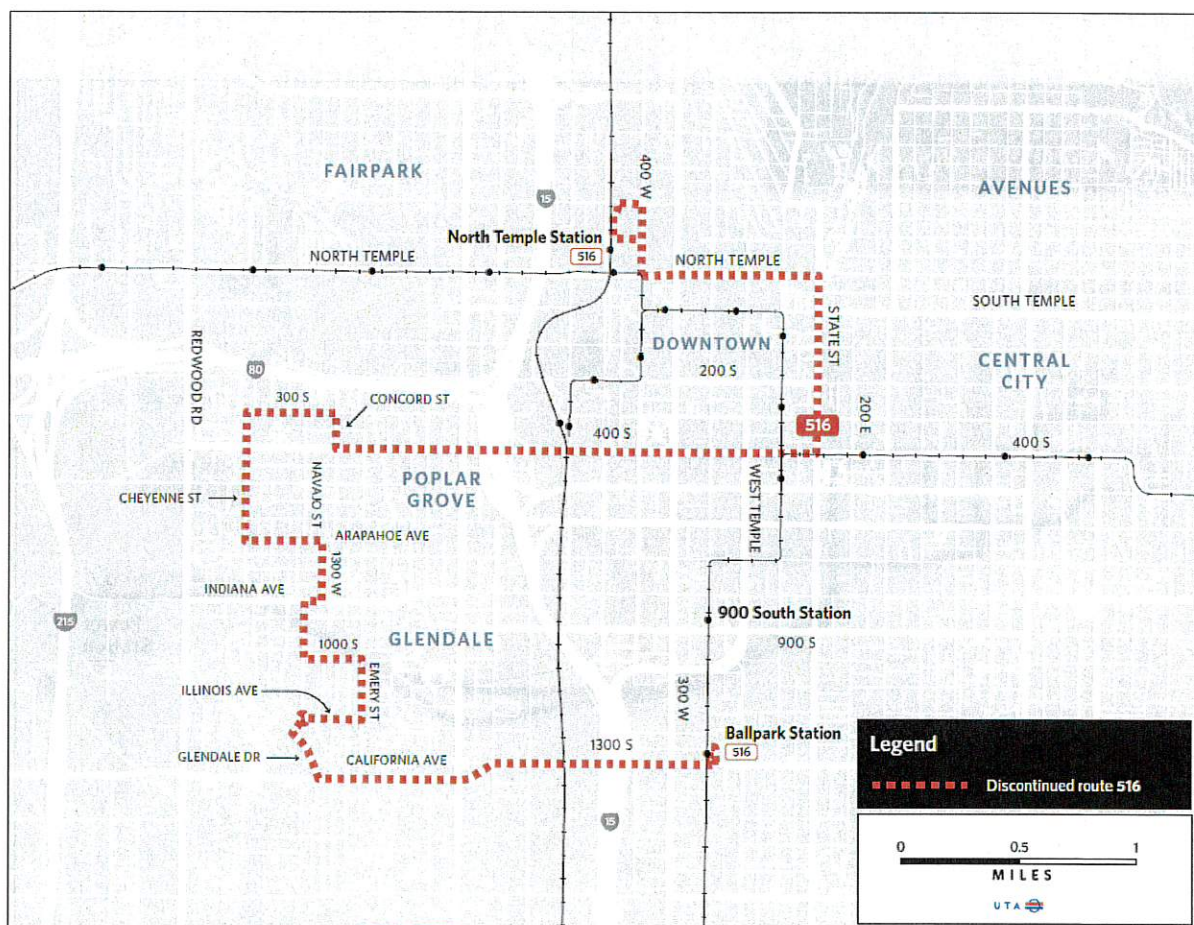
The elimination of a route meets UTA’s threshold for a major change



516 – Discontinuation of Route

UTA would discontinue route 516 and replace it with routes 4 and 9. Route 4 would operate at a similar level of service to route 516; route 9 would operate every 15 minutes Monday–Saturday and every 30 minutes on Sundays. This is a route with high ridership, but winds through Glendale and Poplar Grove neighborhoods instead of staying on a more direct route on main roads.

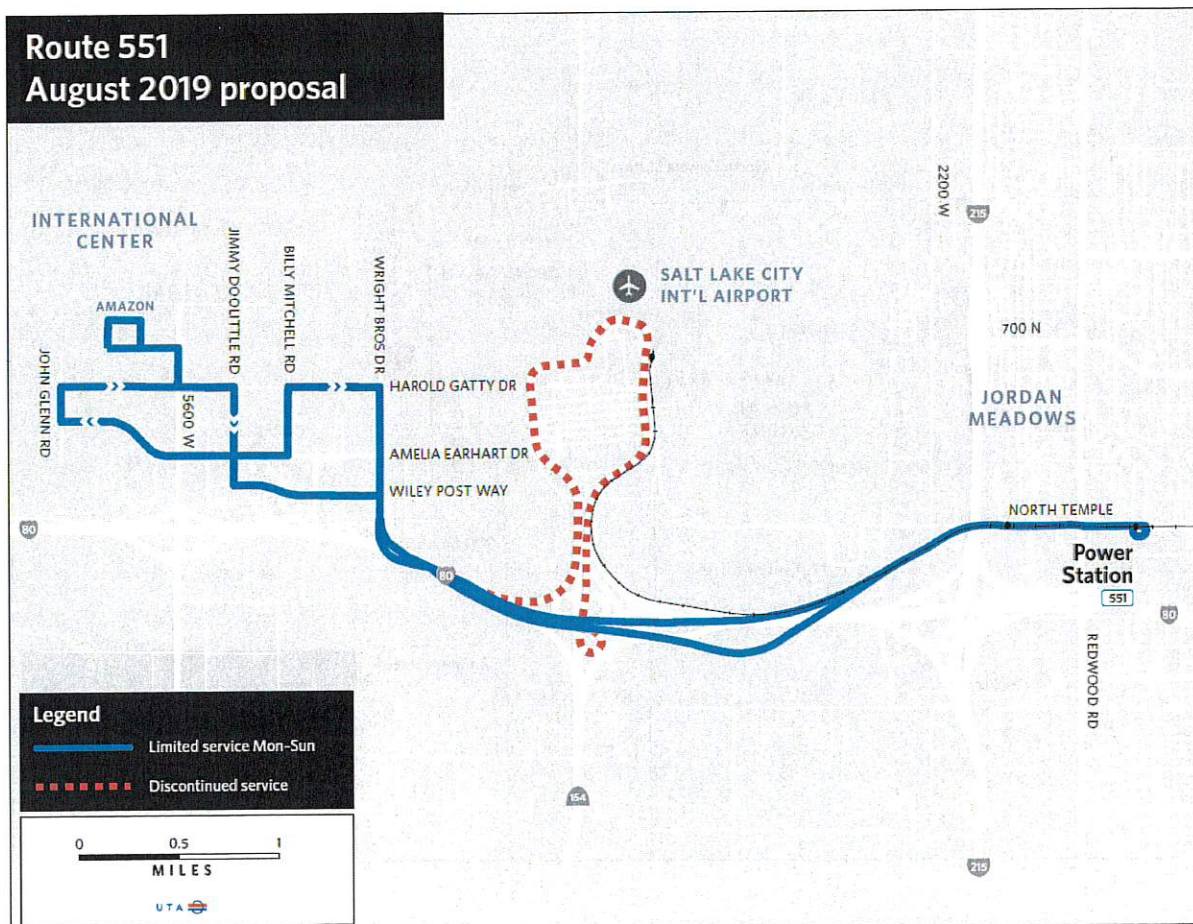
The elimination of a route meets UTA’s threshold for a major change



551 – Change in Alignment

It is proposed to adjust the routing along route 551 to eliminate service to airport terminals and provide additional connections to North Temple and Redwood Road. The airport will continue to be served by the Green TRAX line and route 454. Additional trips would be added on route 551, including during early weekday mornings and weekends, to meet the needs of sponsoring businesses.

A change in alignment of 25% or greater meets UTA's threshold for a major change.

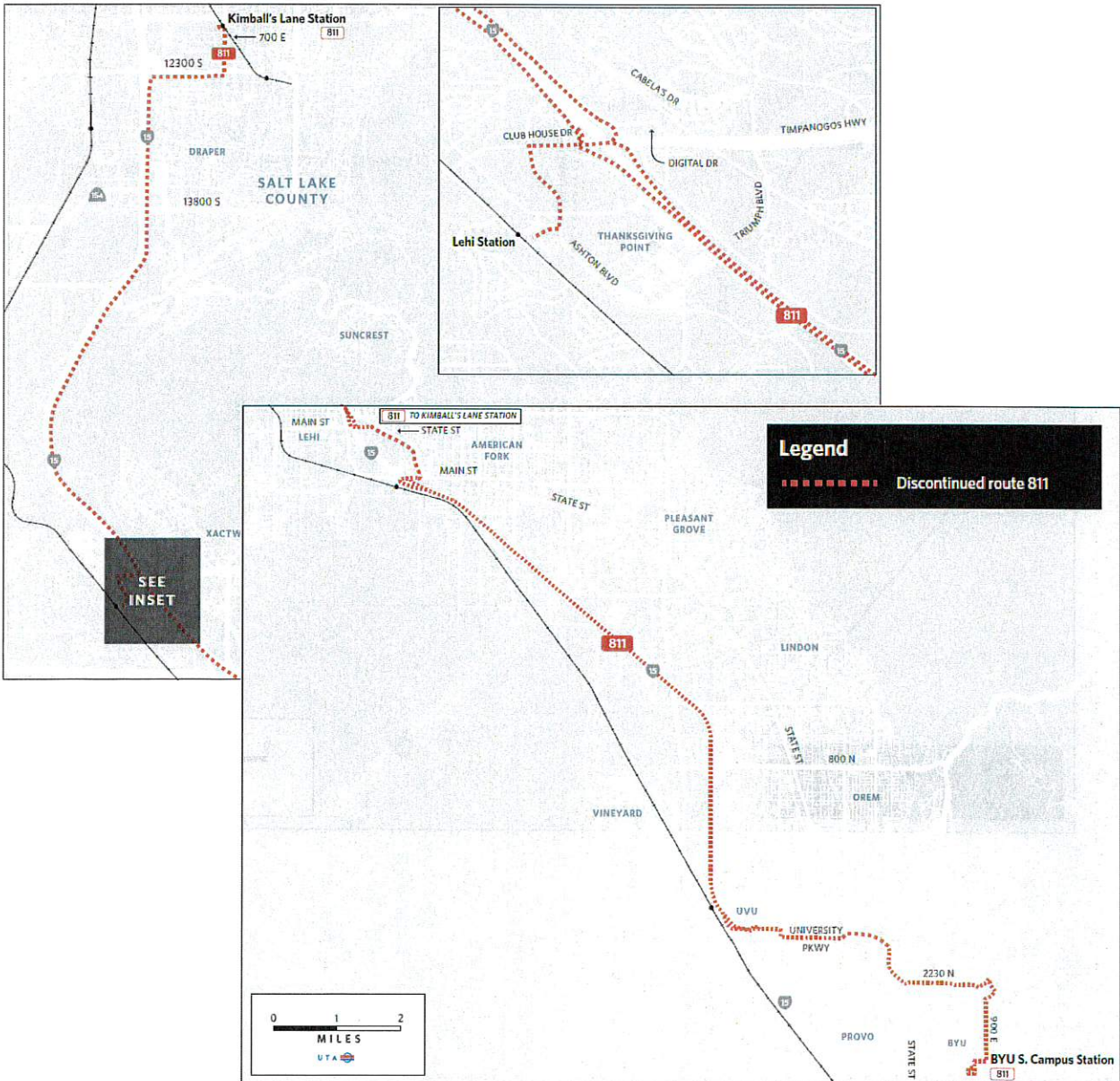


Utah County

811 – Discontinuation of Route

Due to low ridership and low return on investment for this route, it is proposed to discontinue route 811 and replace the service offered with the new route 871 and portions of routes 850 and UVX. This inter-county route was effective prior to the implementation of FrontRunner’s expansion south. Ridership has declined steadily since the opening of FrontRunner.

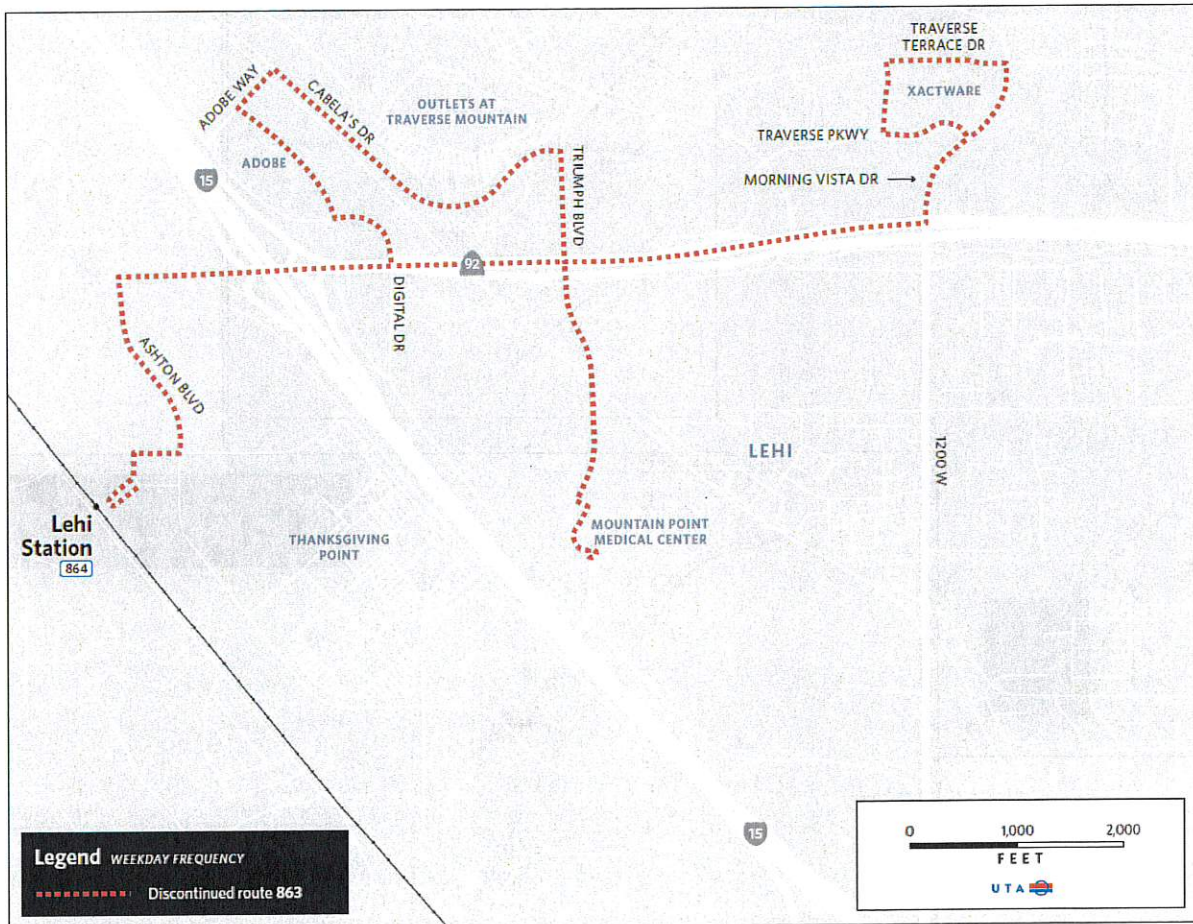
The elimination of a route meets UTA’s threshold for a major change.



Route 863 – Discontinuation of Route

UTA has proposed to discontinue route 863 and replace it with all day service on routes 864 and 871. All existing stops on route 863 will be served by one of these routes. The proposed rerouting of the 864 and 871 will be on the following pages. The new routing that will cover the major destinations currently served by the 863.

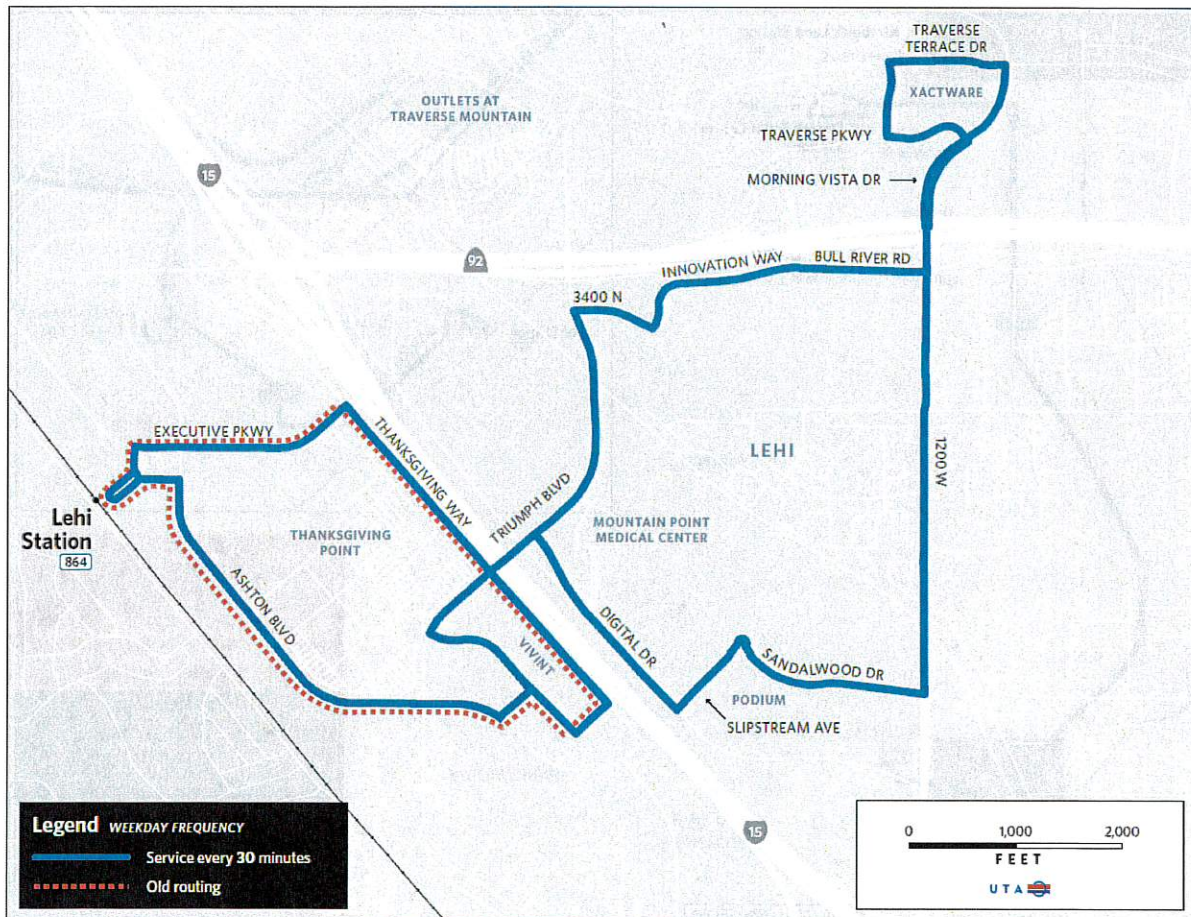
The elimination of a route meets UTA's threshold for a major change.



Route 864 – Change in Alignment

It is proposed to change the alignment on route 864 to provide service to additional businesses in the northern Lehi area. This section of Northern Utah County has been expanding and had several large additions to the network of roads that makes the additional routing effective and provides more local service as well as connections to new and upcoming businesses.

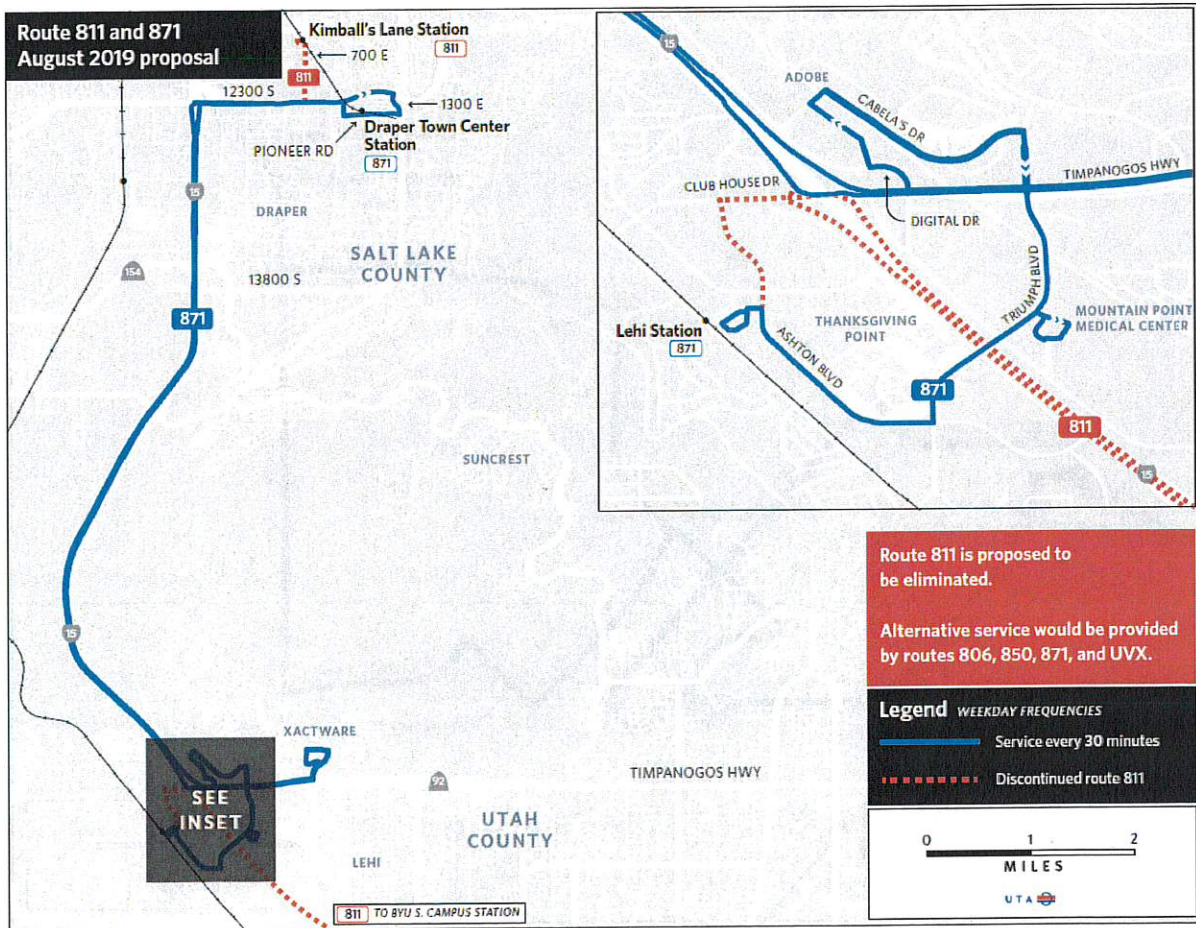
A change in alignment of 25% or greater meets UTA's threshold for a major change.



Route 871 – Addition of Service

UTA has proposed to add a new route that would travel between Draper Town Center Station and Lehi Station. The 871 would provide service to Lehi businesses including Adobe, the Outlets at Traverse Mountain, and the Mountain Point Medical Center. Service would run every 30 minutes on weekdays and every 60 minutes on weekends.

The addition of a new bus route meets UTA’s threshold for a major change.

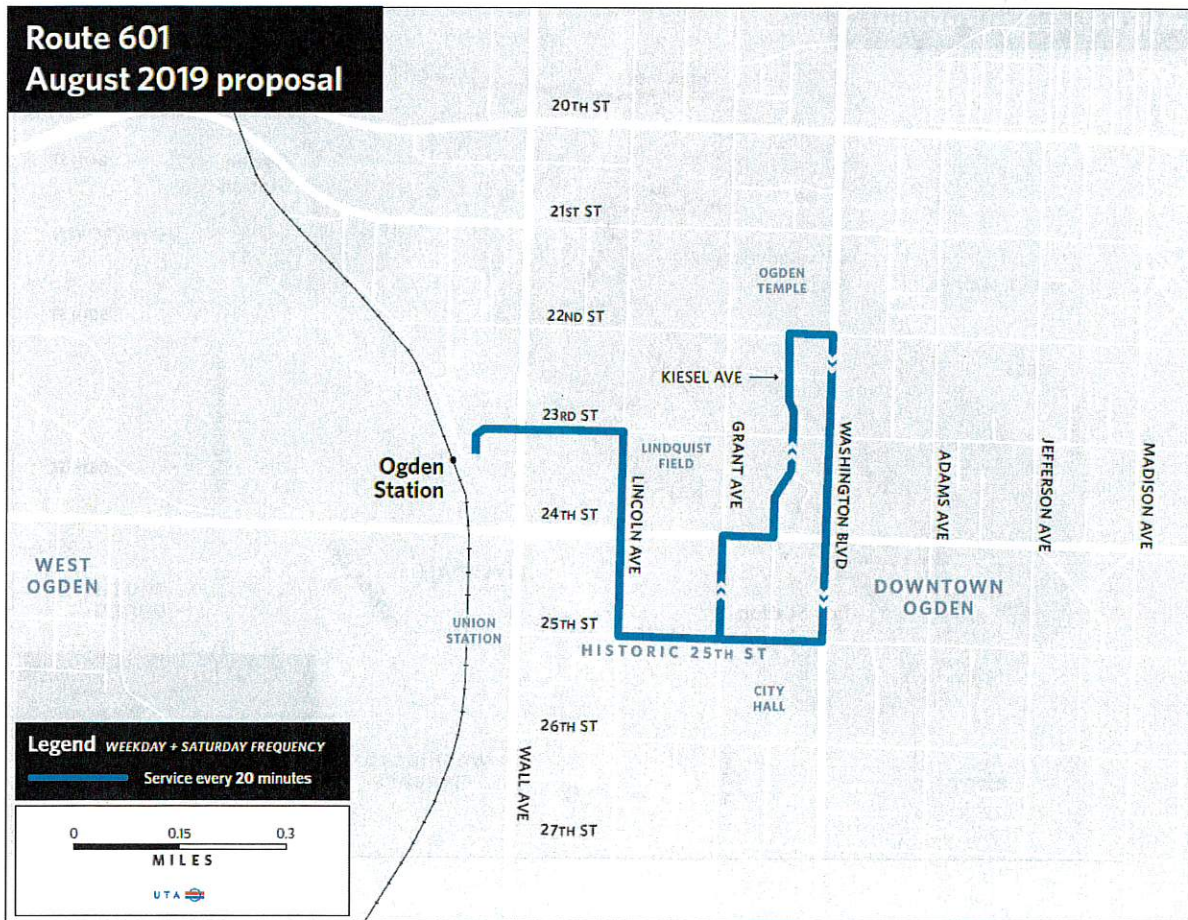


Weber & Davis Counties

Route 601 – Addition of Service

UTA proposes to introduce the new Downtown Ogden Trolley, provided by additional local funding. This route would connect riders to Ogden Station, Lindquist Field, 25th Street, and The Junction. Route 601 would run every 20 minutes from 6 am to 10 pm Monday–Saturday. It is proposed that this fare would be sponsored by Ogden City and Weber County and would be provided at no cost to the individual rider.

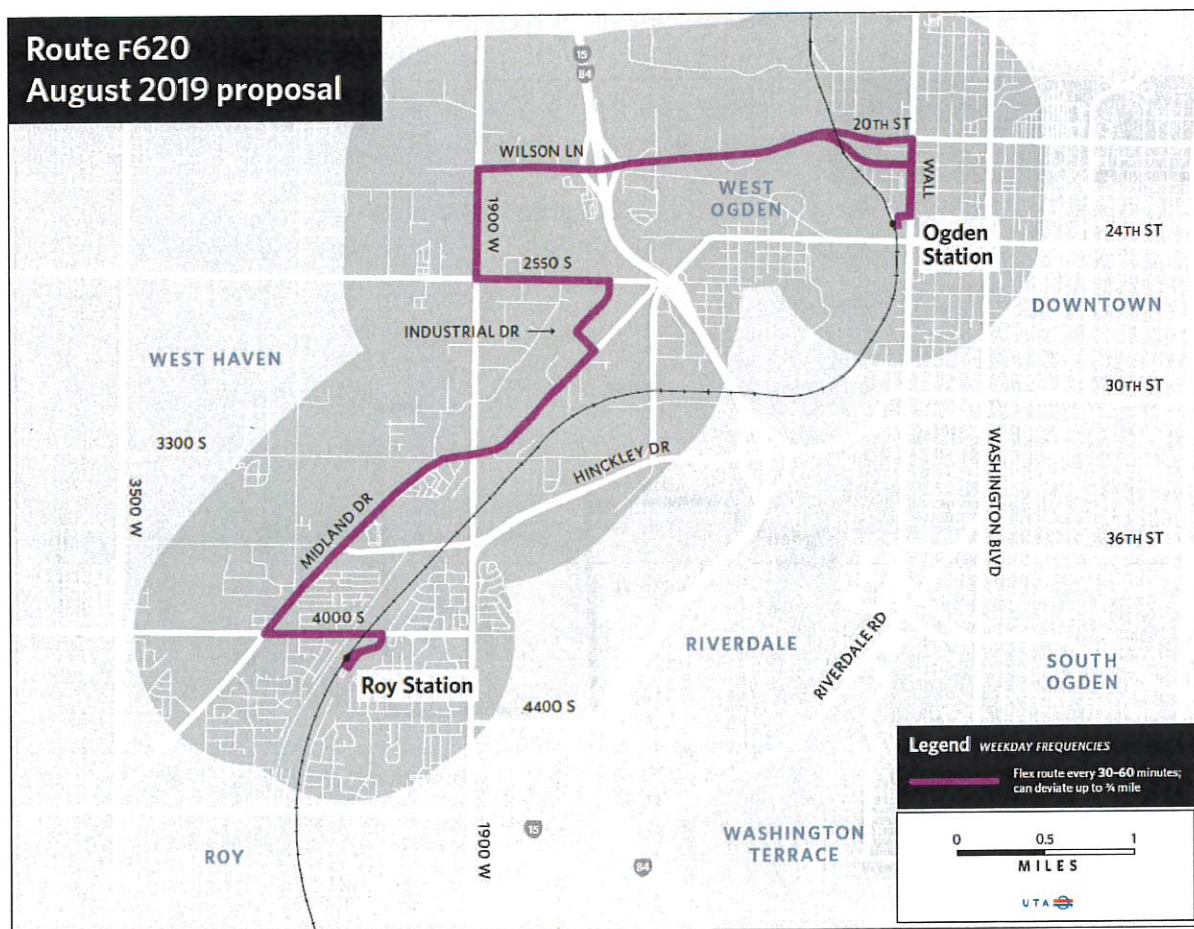
The addition of a new bus route meets UTA’s threshold for a major change.



Route F620 – Addition of Service

UTA proposes to add a new Flex route in Ogden and West Haven. Route F620 would run between Ogden and Roy stations via 1900 West, Industrial Drive, and Midland Drive. The F620 would run every 30 minutes on weekdays from 5:30 am to 9:30 am and from 2:30 pm to 6:30 pm. It would run weekday service every 60 minutes between 9:30 and 2 pm and from 6:30 pm to 8:30 pm.

The addition of a new bus route meets UTA's threshold for a major change.



Analysis of Proposed Changes

UTA has analyzed the potential impacts of any major service change as it relates to low-income and minority populations, and evaluated the potential for adverse impact on these groups. To this end, UTA has created the maps, tables and related data found in this section. The data in this section was compiled utilizing American Community Survey (ACS) 2012-2016 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups 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. Some stops locations are approximate and may be in a different location once land is acquired or permissions are granted for land use. All bus stop locations have had a one quarter mile walkability radius applied to them, which was based on the actual accessibility of the stop or station by road. Any census block that was overlapped by this radius had 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.

Total low-income population was calculated using ACS household income data which excludes certain housing types where a “household” does not reflect those within the living quarters (e.g. prisons, college dormitories, etc.). For this reason, the total minority population and the total low-income population differed at varying degrees contingent upon the number of this household type within the impacted area.

The maps in this section show the route, individual stops, and census blocks with concentrations of low-income households or minority individuals above the system average shaded.

Analysis of Potential Impacts on Minority Populations

This section examines the populous being served by current service on the routes being impacted by the proposals. The tables below depict the current proportion of minorities on routes that would be impacted by the proposed changes and the proportion of minorities on the routes after all changes are made.

Minority Demographics Prior to Proposed Changes

Route	Proposed Change	Total Population	Minority Population	Minority Percent
9	Alignment Change	15,482	4,308	27.8%
228	Discontinuation	46,348	8,457	18.2%
451	Fare Change	15,720	2,218	14.1%
453	Discontinuation	23,603	5,816	24.6%
500	Discontinuation	11,251	2,431	21.6%
516	Discontinuation	27,432	14,916	54.4%
551	Alignment Change	0	0	0%
811	Discontinuation	19,602	3,999	20.4%
863	Discontinuation	2,222	199	9.0%
864	Alignment Change	638	82	12.9%
F401	Discontinuation	7,965	907	11.4%
F401	(3/4 Mile Buffer)	16,230	1,790	11.0%

Minority Demographics After Proposed Changes

Route	Proposed Change	Total Population	Minority Population	Minority Percent
4	New Route	31,733	11,196	35.3%
9	Alignment Change	27,607	13,578	49.2%
451	Fare Change	16,966	2,525	14.9%
551	Alignment Change	2,605	1,696	65.1%
601	New Route	2,500	951	38.0%
864	Alignment Change	2,255	237	10.5%
871	New Route	5,289	634	12.0%
F453	New Route	4,595	1,047	22.8%
F453	(3/4 Mile Buffer)	21,901	9,365	42.8%
F620	New Route	5,822	1,715	29.5%
F620	(3/4 Mile Buffer)	25,611	9,011	35.2%

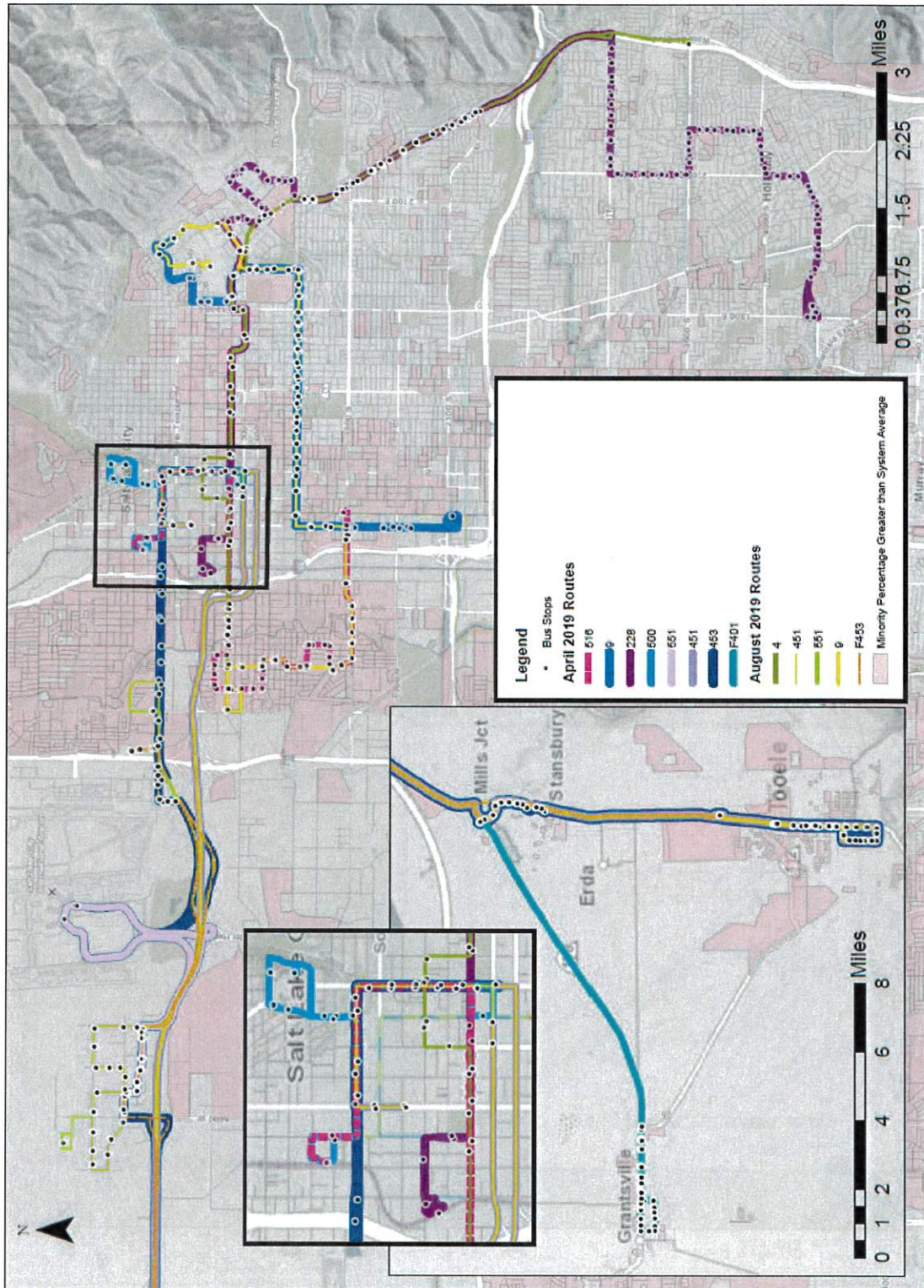
Potential Route Level Disparate Impacts

In reviewing the data presented, UTA identified the potential for a disparate impact on routes 9 and 516 in accordance with UTA's disparate impact policy. The impacted populace has a percentage of minorities living within its bounds in excess of 5% of the system average. It is of note that several of the new routes have a low percentage of minorities and, in most cases, they are in excess of -5% of the system average of 22.1%. UTA has not identified these as potential disparate impacts because the budgets to create these new routes were not funded by the discontinuation of other routes with high percentages of minorities and thus do not present an adverse impact by their creation. The discontinuation of the routes in the proposed changes were motivated by a system-wide push to streamline routes and make the system more efficient for riders and operations.

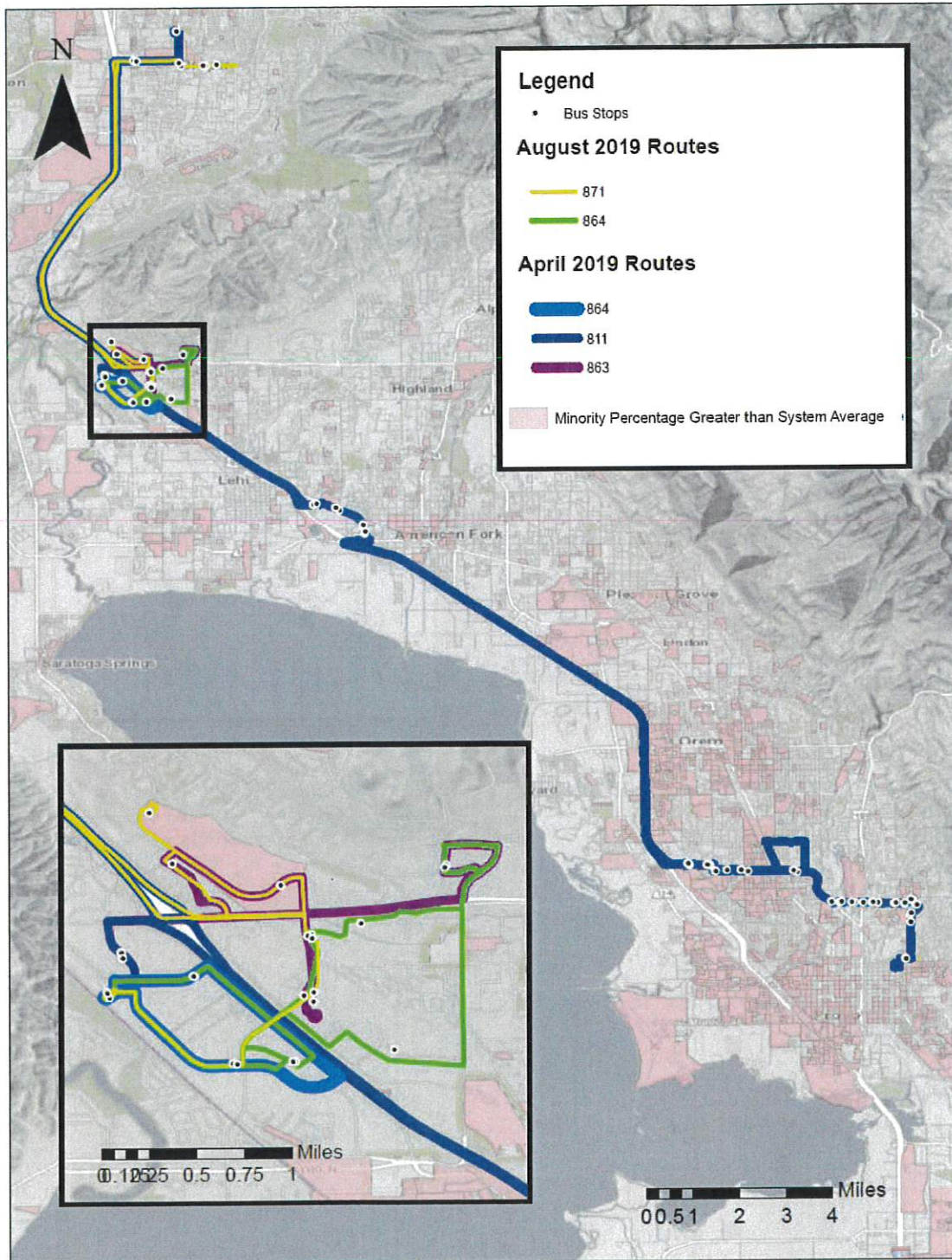
Since the route 9 is a realignment of current service, the new demographics are listed in the second table on the previous page. The original alignment had 4,308 minorities, comprising 27.8% of the total population or 5.7% greater than the system average. The new alignment's surrounding population has increased by 12,126 people, of which 9,270 are minorities. Overall, the percent and number of minorities within the area has increased after the proposed changes. For this reason, UTA does not find a disparate impact.

It is proposed to discontinue the 516, which serves the Poplar Grove and Glendale areas of Salt Lake with 30 minute frequency. These are majority minority areas and the demographics of the route is 54.4% minority. The proposal replaces the 516 with an extension to route 9, which presently does not provide service to these areas. Route 9 will follow a more efficient route and provide faster, more frequent service with 15 minute headways in lieu of 30 minute headways on current service. Additionally, it is proposed to create route 4 to replace the service being lost on 400 south that was once provided by route 516. Overall, there will be those in the area that will no longer have ¼ mile walk access to the new routes that would have had access to route 516, but will have more efficient service on the new routing in the area as shown on the following page. The demographics of those no longer within the quarter mile walk access would still be above the system average (35.7% minority, 34.5% low-income). After reanalyzing the impacts when accounting for the replacement routes, UTA has concluded that there is likely a net gain in the area with the quality and frequency of service gained and that the considered alternatives, such as leaving the current system in place, did not accomplish the established goal of streamlining service. UTA has decided to proceed with the proposed changes regardless of the potential disparate impact and disparate impact.

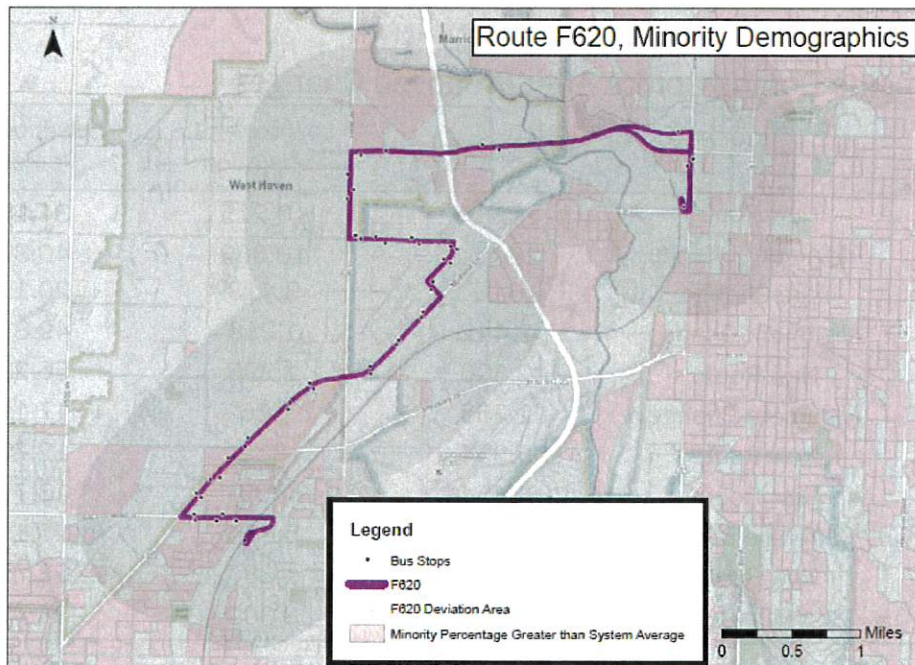
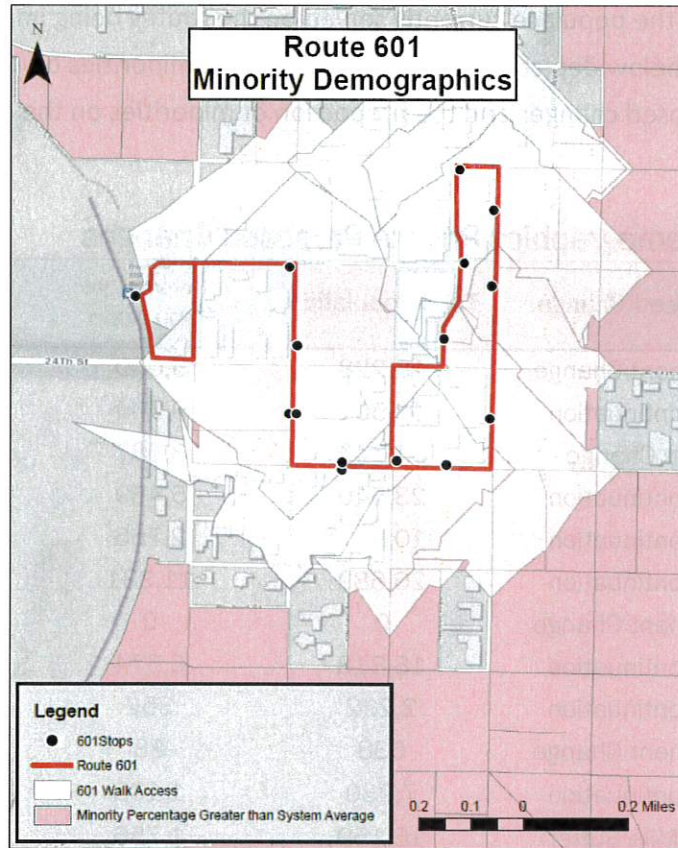
Map Showing Density of Minorities in Salt Lake and Tooele Counties



Map Showing Density of Minorities in Utah County



Map Showing Density of Minorities in Weber and Davis Counties



Analysis of Potential Impacts on Low-income Populations

This section examines the populace currently served on the routes being impacted by the proposals. The tables below depict the current proportion of minorities on routes that would be impacted by the proposed changes and the proportion of minorities on the routes after all changes are made.

Low-income Demographics Prior to Proposed Changes

Route	Proposed Change	Total Population	Low-income Population	Low-income Percent
9	Alignment Change	15,228	5,049	33.2%
228	Discontinuation	43,501	9,764	22.4%
451	Fare Change	15,740	3,087	19.6%
453	Discontinuation	23,540	5,459	23.2%
500	Discontinuation	10,827	2,756	25.5%
516	Discontinuation	26,689	11,331	42.5%
551	Alignment Change	0	0	0%
811	Discontinuation	16,818	6,574	39.1%
863	Discontinuation	2,222	352	15.8%
864	Alignment Change	638	88	13.8%
F401	Discontinuation	7,930	1,133	14.3%
F401	(3/4 Mile Buffer)	16,159	1,756	10.9%

Low-income Demographics After Proposed Changes

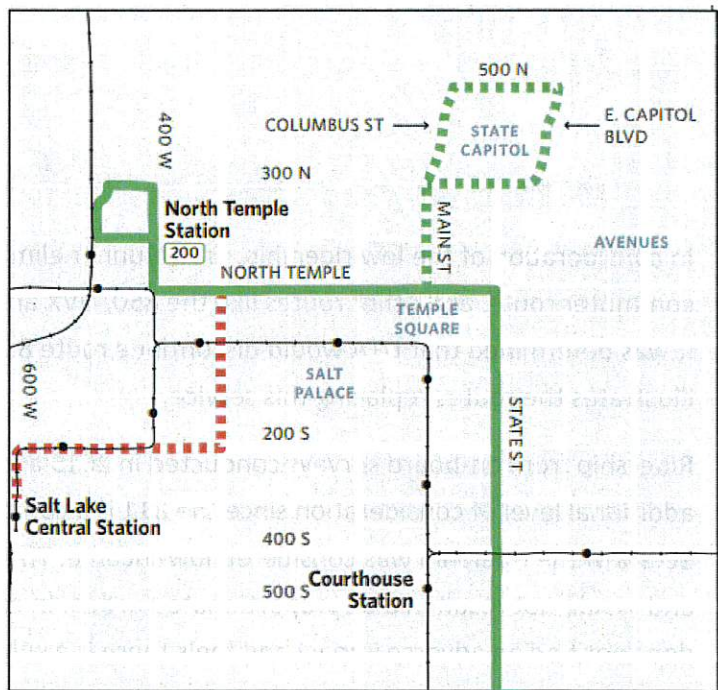
Route	Proposed Change	Total Population	Low-income Population	Low-income Percent
4	New Route	29,965	10,215	34.1%
9	Alignment Change	26,451	10,662	40.3%
451	Fare Change	16,971	3,413	20.1%
551	Alignment Change	2,442	1,215	49.8%
601	New Route	2,306	1,295	56.2%
864	Alignment Change	2,255	386	17.1%
871	New Route	5,254	666	12.7%
F453	New Route	4,454	609	13.7%
F453	(3/4 Mile Buffer)	21,646	5,876	27.1%
F620	New Route	5,841	1,387	23.7%
F620	(3/4 Mile Buffer)	23,940	8,302	34.7%

Potential Route Level Disproportionate Burdens

In reviewing the data presented, UTA has identified that routes 9, 500, 811 and 516 have the potential for a disproportionate burden borne by low-income populations due to the demographics of those impacted in accordance with UTA’s disproportionate burden policy. As with the assessment of disparate impact, several of the new routes have a low percentage of low-income populations benefitting from the addition. The previously noted reason they were not considered disparate impacts is applicable here as well.

In addressing routes 9 and 516, please see the analysis for disparate impact. The same conclusions are drawn when examining the potential disproportionate burdens. The proposed changes to route 9 also resulted in a net benefit to a larger number of low-income households. The 516 has substantial replacements available that provide a more efficient and frequent service through Glendale and Poplar Grove, which are majority minority areas.

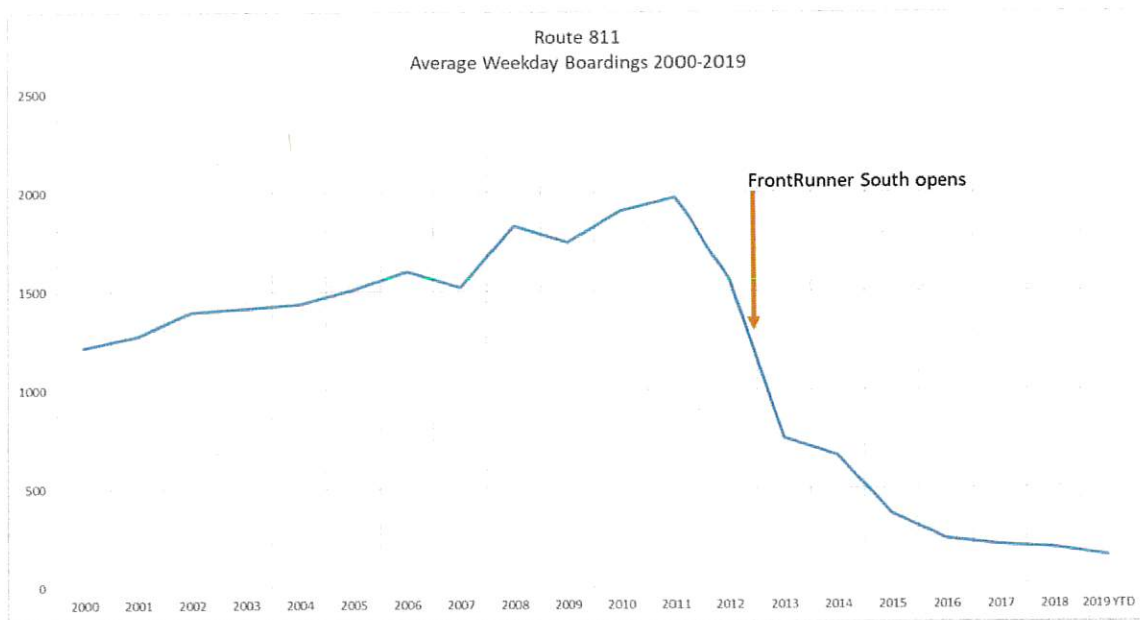
Route 500 was specifically implemented to provide service to the State Capitol Building. The proposal to eliminate the route includes some rerouting on the 200, which would increase the frequency to the capitol from 30 to 15 minutes. On weekdays, the 200 has been rerouted to cover the same route to the capitol and North Temple Station. The only difference in routing will be a detour from State Street to the Courthouse TRAX Station and back to State Street.



In considering the more frequent service that is provided to the same areas and the specificity of the route’s purpose in providing access to the State’s Capitol building, UTA did not find a disproportionate burden on the low-income population in the area.

When examining the elimination of route 811 and its potential adverse impacts on low-income populations, it is advantageous to note that this is a commuter route where much of the route is on the freeway. It had heavy ridership prior to the opening of FrontRunner South. After this,

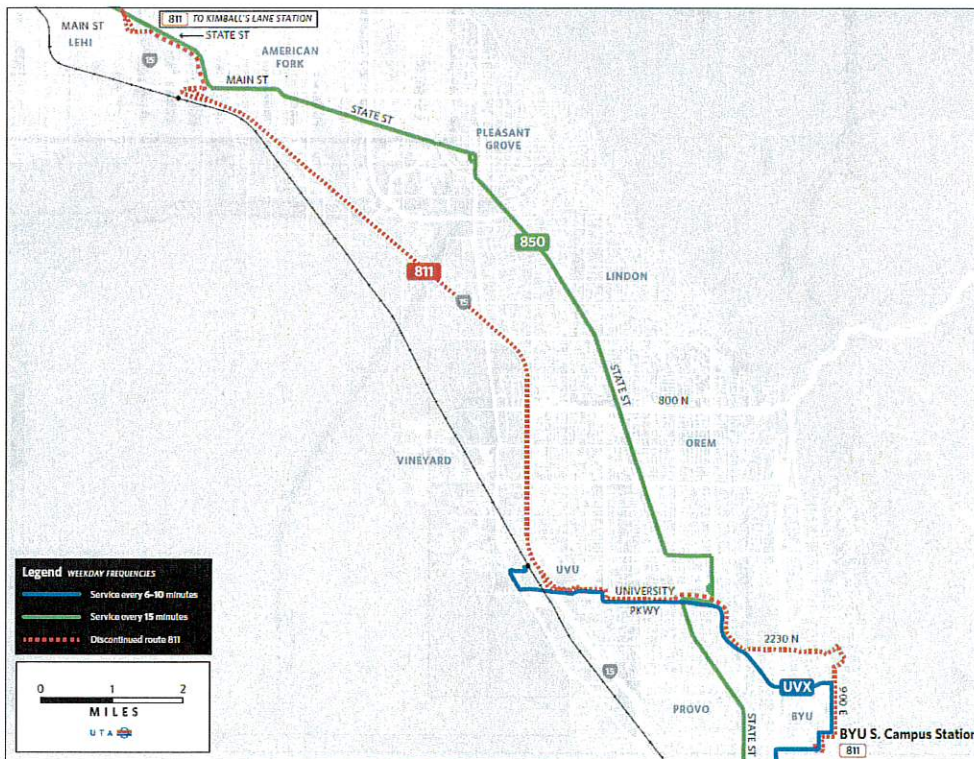
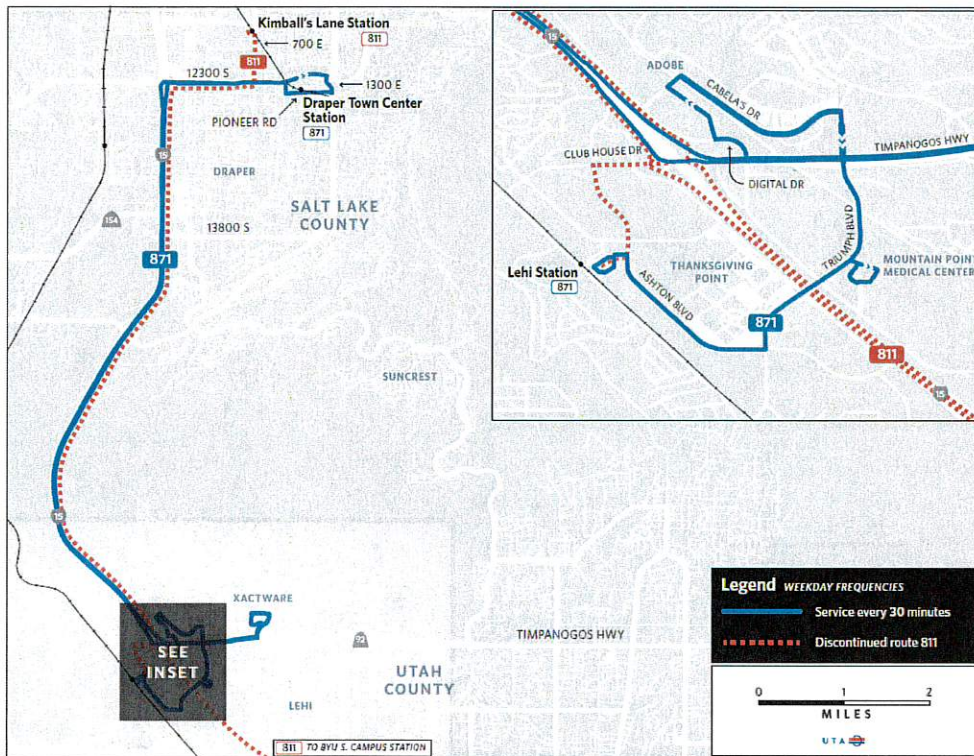
ridership dropped sharply and continues to do so, as shown in the ridership line graph below. UTA looked at average daily ridership for each month over the past 19 years which show an upward trend prior to FrontRunner South opening and then a substantial decrease that has continued to steadily move downward over time.



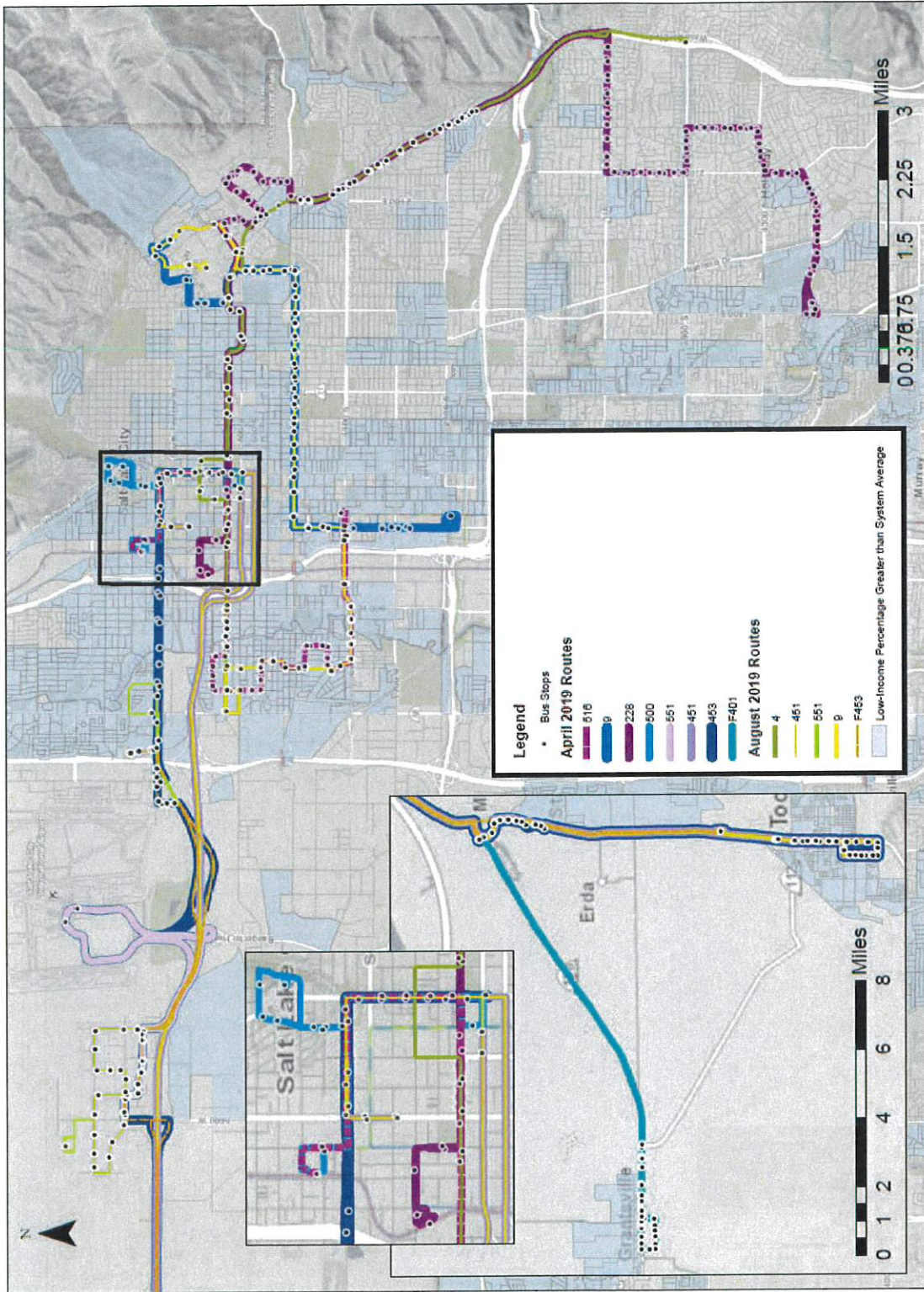
In consideration of the low ridership, FrontRunner eliminating much of the need for a commuter route, and other routes like the 850, UVX and 871, that provide better local service, it was determined that UTA would discontinue route 811. The maps on the following pages illustrates the routes replacing this service.

Ridership from on-board surveys conducted in 2015 and 2016 were also reviewed as an additional level of consideration since the 811 is a commuter route. Of those interviewed, 20.3% of the ridership was considered low-income. This is more in line with the system average and would not result in a disproportionate burden. In consideration of all of these factors, UTA does not find an adverse impact and feels there is a substantial, legitimate business reason to proceed with the change and ample alternatives even if there were.

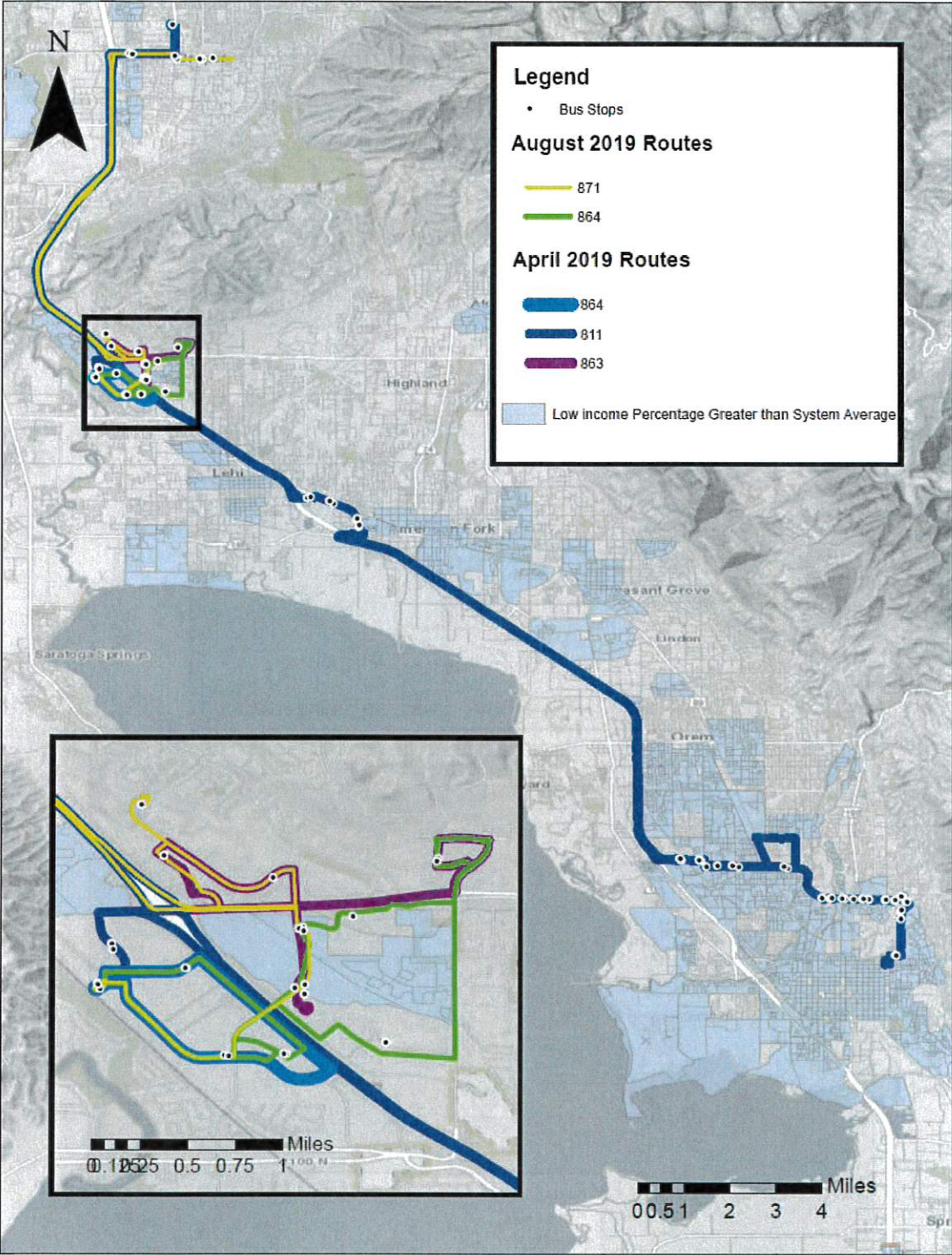
Route 811 Mitigating Routes



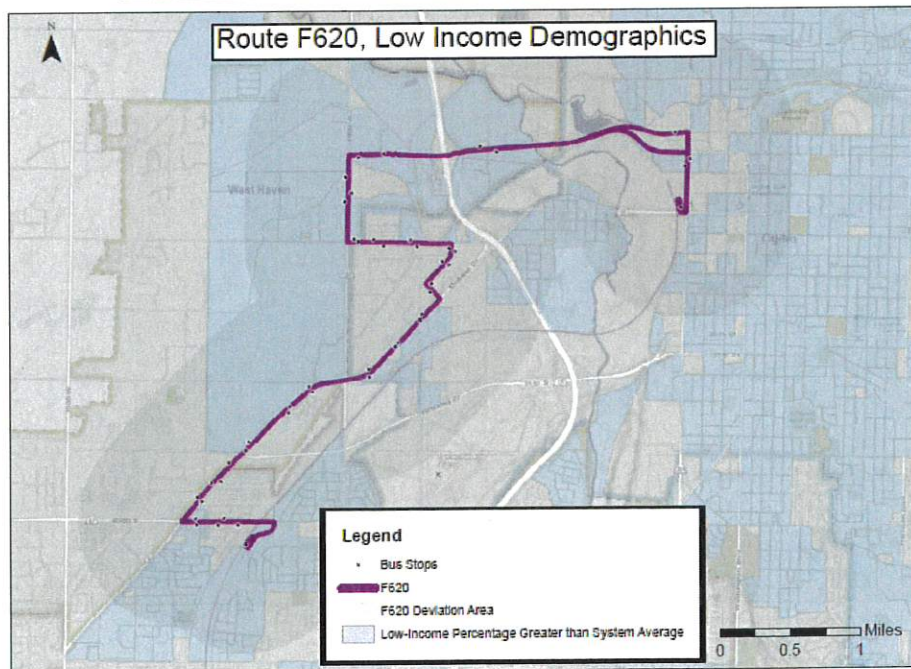
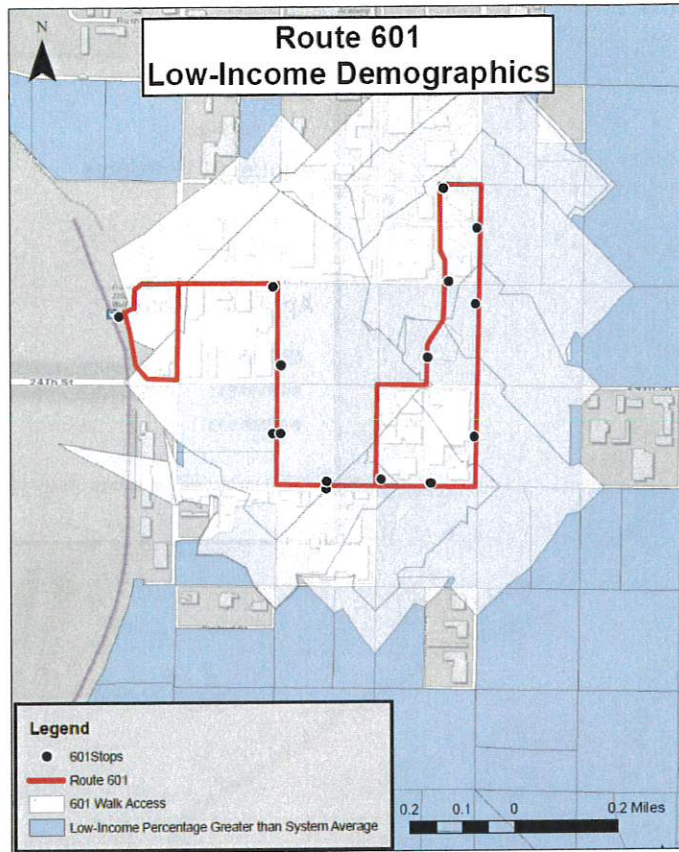
Map Showing Density of Low-Income in Salt Lake and Tooele Counties



Map Showing Density of Low-Income in Utah County



Map Showing Density of Low-Income in Weber and Davis Counties



System-Wide Impacts

UTA has stated in policy that it would measure the impacts of all major service changes cumulatively when there is more than one proposed major change for a service period change. In order to accomplish this, UTA took an aggregated total of all of the census blocks that fell within a quarter mile of all of the stops on the routes that had proposed changes. In order to measure impact, the figures presented are separated into populations as they currently stand and as they would be if all of the proposed changes were finalized. Special considerations were made to ensure that any census blocks overlapped by multiple routes were not counted twice. Below is a before and after breakdown using these parameters.

Change in System-Wide Minority Geographic Access to Transit Service

	Minority Persons	Total Population	Minority Percent
Pre-August Change	35,915	130,605	27.5%
August 2019 Proposal	35,490	107,350	33.1%
Difference	-425	-23,255	

Change in System-Wide Low-income Geographic Access to Transit Service

	Low-income Persons	Total Population	Low-income Percent
Pre-August Change	36,116	124,448	29.0%
August 2019 Proposal	32,549	102,067	31.9%
Difference	-3,567	-22,381	

As may be expected considering UTA’s goal to streamline the system, the number of people within a quarter mile of the system has been reduced. Many routes were eliminated or realigned to have more direct routes, which will make the system more effective at getting people to their destinations with improved frequency and longer spans of service. However, it also eliminates some of the deviations from main roads that made the service more accessible to some neighborhoods. Despite this, it has been shown that people are willing to walk farther for more frequent, better service.

After a review the number of people that no longer fall within the quarter mile radius, it becomes evident that the people that would lose access on a system-wide level are well below the system average for both low-income and minority demographics. Only 1.8% of those that would lose access were minorities and only 15.9% were considered low-income. These numbers do not cause a system-wide concern for either a disparate impact borne by minority populations or a disproportionate burden on low-income populations.

Conclusion

Although there were some changes that had a potential route level adverse impact on low-income and minority populations, UTA has concluded that overall the changes being presented and analyzed are largely to the benefit of the communities served. When examining the overall impact of the changes, there were an estimated 23,255 people that were no longer within the quarter mile walk access that UTA has defined as those with reasonable access to a route.

Although there is a loss of walk access, the service that has taken the place of or new routes have created a more efficient and effective level of service. Additionally, the percentage of low-income and minority populations that have lost reasonable walk access to the impacted routes are 15.9% and 1.8% respectively. These low percentages are below the system average and would not indicate that any adverse impacts felt by the proposed changes are disproportionately borne by populations addressed by Title VI of the Civil Rights Act of 1964.

Appendix A – August 2019 Change Day Public Comment Report

Public Comment Report – August 2019 Change Day

Prepared by Andrea Packer, Communications Director & Public Hearing Officer

The August 2019 change day is one of the largest in UTA's history. Changes were proposed to more than 40 routes throughout UTA's service area. Proposed changes included several new routes and the realignment of routes. While some routes were proposed to be discontinued, they were replaced with new and realigned routes designed to increase frequency, expand service hours, and to provide more mid-day and weekend service. In addition, in partnership with Salt Lake City's Funding our Future program, additional city resources are being applied to expand services on Routes 2, 9 and 21.

- **Utah County**: Changes proposed to Routes 806, 811, 850, 863, 864 (new route) and 871 (new route).
- **Salt Lake County**: Changes proposed to Routes 2, 2X, 3, 4 (new route), 6, 9, 11, 17, 21, 200, 213, 220, 223, 228, 313, 354, 470, 500 (discontinued, replaced by Route 200), 516 (discontinued, replaced by Routes 4 and 9), 520 and 551.
- **Davis/Weber Counties**: Changes proposed to Routes 470, 601 (new route) and F620 (new route).
- **Tooele County**: Changes proposed to Routes F401 (discontinued, replaced by Route 454), 451, 453 (discontinued, replaced with Route 451), F453 (new route) and 454.

Public Outreach and Comment Period

UTA staff planned and implemented a very pro-active public outreach and comment effort to build awareness of the proposed changes among current riders and the public and to encourage meaningful and comment and feedback.

In accordance with UTA policy, a public comment period was held from March 13 – April 19, 2019. Multiple activities were conducted during this period to inform riders and the public and to obtain feedback.

Public Hearing Notices: Public hearing notices were published in the following locations. Information on the comment period and hearing was also published on UTA's social media channels.

- UTA Website
- State of Utah Public Notice Website
- Salt Lake Tribune
- Deseret News
- Ogden Standard Examiner
- Provo Daily Herald

- Tooele Transcript Bulletin

Public Hearings/Open Houses: A total of 6 public hearings were held throughout UTA’s service area.

- April 2 from 4:30 – 6:30 p.m.: Taylorsville Library, 4870 S. 2700 W., Taylorsville
- April 3 from 4:30 – 6:30 p.m.: Utah Transit Authority, 669 W. 200 S., Salt Lake City
- April 4 from 4:30 – 7:30 p.m.: Tooele County Building, 47 S. Main Street, Tooele
- April 9 from 4:30 – 6:30 p.m.: Ogden Intermodal Hub, 2350 Wall Avenue, Ogden
- April 10 from 4:30 – 6:30 p.m.: Provo City Library, 550 N. University Avenue, Provo
- April 11 from 4:30 – 6:30 p.m.: Salt Lake Library, 210 E. 400 S., Salt Lake City
- Comments were accepted via UTA’s website, via email at hearingofficer@rideuta.com, through the mail and by phone.

Submitting Comments: Comments and feedback were accepted in multiple formats:

- At the public hearings
- Online via UTA website
- Telephone to UTA Customer Service
- Email
- U.S. Mail

Summary of Comments Received

UTA received a total of 316 comments regarding the proposed August 2019 changes. Twenty-nine percent of the comments were regarding the proposed changes in Tooele County, and 22 percent of comments were about Route 220. The comments were mixed, with comments both supporting proposed changes as well as comments expressing concern. Many comments were received about the service increases and expansion proposed for many routes. Examples of comments received include:

- **Tooele County:** comments about proposed trip times, concern about travel time in Tooele/Stansbury, and overcrowding on some trips.
- **Route 220:** comments included support for moving the route to 200 South as well as comments against moving the route. UTA also reached out to Salt Lake Regional Hospital.
- **UofU Hospital:** with the end of some routes moving out of the hospital loop, comments included concern about the increased walk time / distance from Mario Capecchi Drive.

In response to the comments received, UTA made a number of adjustments to the proposed changes and did additional outreach to educate riders about new alternatives. Examples include:

- **Tooele County:**
 - Preserved arrival time of the first Route 451 trip into downtown Salt Lake City
 - Removed low ridership stops on Route 453 to improve travel time
 - Implemented mid-day service on Route F453 to ease congestion
- **Route 200 and 516:**
 - Met with customers to educate them about alternate routes in the downtown area (Routes 6 and 11)

- **UofU Hospital:**

- Worked with the U to allow Routes 2, 6 and 11 to continue serving the hospital loop
- Expanded the layover location near the Union Building for Routes 9, 17 and 223

UTA staff briefed the Board of Trustees about the comment period and final proposals in their regular open meeting on July 10, 2019. Based on the feedback received and final analysis, the proposed service changes will be implemented on August 11, 2019.

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE TITLE VI FARE EQUITY ANALYSIS FOR THE
MAX LINE TICKET VENDING MACHINE REMOVAL**

R2019-11-01

November 6, 2019

WHEREAS, the Utah Transit Authority (the "Authority") is a large 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 Fare Equity Analysis of MAX Line TVM Removal ("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:

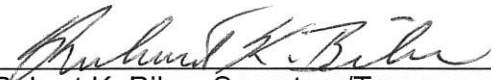
1. That the Title VI Equity Analysis prepared by Authority staff, a copy of which is attached hereto as Exhibit A, is hereby approved by the Authority.
2. That the Board hereby ratifies any and all actions taken by the Authority's Executive Director and staff in furtherance of and effectuating the intent 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 6th day of November 2019.



Carlton Christensen, Chair
Board of Trustees

ATTEST:


Robert K. Biles, Secretary/Treasurer

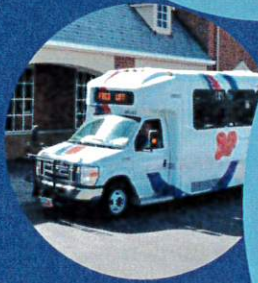


(Corporate Seal)

Approved As To Form:


Legal Counsel

Exhibit A



Title VI Fare Equity Analysis

MAX Line TVM Removal

Utah Transit Authority

Contents

Introduction	3
Summary of Proposal.....	3
Removal of Ticket Vending Machines:.....	3
UTA Policy and Definitions.....	4
Definitions.....	4
Major Service Change	5
Evaluation and Analysis of Service and Fare Changes	5
Disparate Impact and Disproportionate Burden	6
Finding a Disparate Impact	6
Finding a Disproportionate Burden	7
Datasets Used in Analysis	7
Proposed Change	8
Public Outreach.....	9
Alternatives to Proposal.....	10
Demographics of Impacted Population	10
Findings	11
Appendix A: Notice to Public of Change	14

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 a proposal to eliminate a method of payment on a single line of service. The proposed change would be implemented on December 1, 2019. These changes are being proposed to provide better stewardship of funds currently allocated in the maintenance of and collection of funds from the Ticket Vending Machines (TVM) along the MAX BRT line. Though the proposed change is facially neutral, this analysis, in accordance with FTA guidelines, will consider whether the change might have a disproportionately negative impact on minority and/or low-income populations within UTA's service area. UTA will take all prescribed and prudent steps to ensure services are equitable for the communities served as well as compliant with federal guidelines and requirements.

Summary of Proposal

Removal of Ticket Vending Machines:

It has been proposed to remove Ticket Vending Machines (TVM) from stops along the 35 MAX line. The TVMs are decreasingly used, beyond the manufacturer's warranty period, require consistent repair, and are often not operational. Fare boxes are on each bus and will allow for payment of fare on board. However, there will be no way to pay fare at the time of boarding with a credit card unless another mechanism is used, such as a FAREPAY card or UTA's mobile ticketing app.

Although this may not be a clear change in fare, which would constitute a major change, UTA has decided to conduct an equity analysis of the proposal. This analysis will examine the populations impacted by the change and weigh the authority's options in determining the appropriate action to take.

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 populace 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.

Datasets Used in Analysis

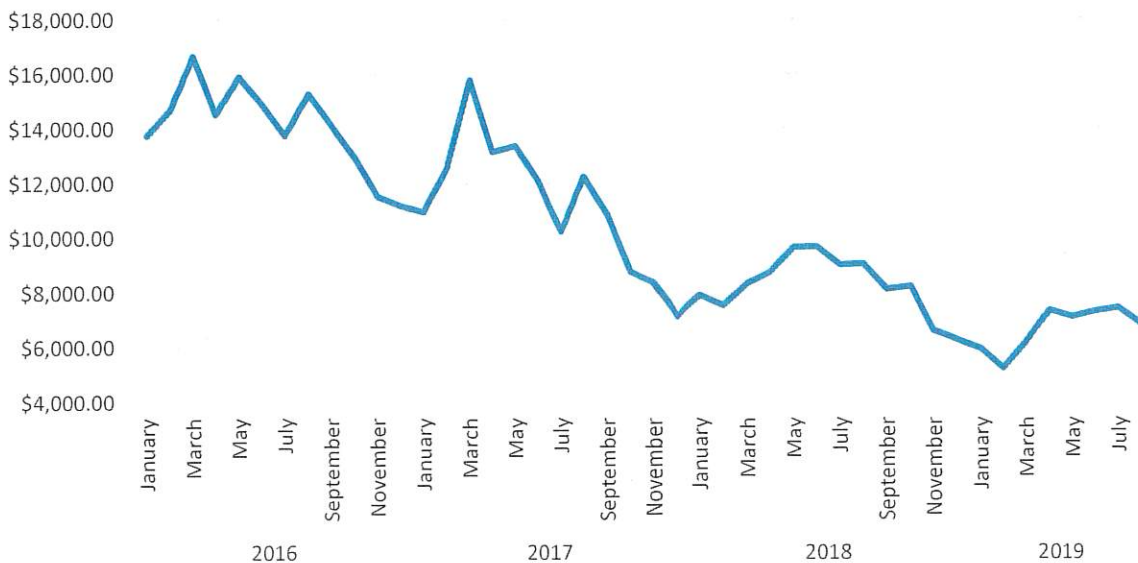
UTA has created maps, tables and utilized ridership data. The demographic data was compiled utilizing American Community Survey (ACS) 2011-2015 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups. This was done in order to use the smallest geographic area possible 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. All stops had a one quarter mile radius applied to them based on the actual accessibility of the stop by road. Any census block that is overlapped by this walkability radius had 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.

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.” In light of this requirement, UTA has reviewed the 2015-2016 on-board survey data collected and has determined that both sample size and question structure did not yield reliable data that can be directly applied to the subset of credit card users on TVMs. Instead, UTA is using the demographics of the route geographically and the ridership data as an idea of the demographics.

Proposed Change

The 35 Max is a nine-mile line that runs through Magna, West Valley City and provides a connection to the West Valley Central Station, serviced by ten bus lines and the TRAX Green Line, and ends at the Millcreek Station, serviced by another bus route and the TRAX Red and Blue Lines. The route has features like a Bus Rapid Transit (BRT) in that it has dedicated lanes and fewer stops than a typical bus line. The 35 MAX officially opened in July of 2008. With the intent to create a faster service, UTA initially built limited stops with no requirement to provide proof of fare payment prior to boarding. The original stations included TVMs to allow for the pre-purchase of tickets in order to decrease the time spent loading passengers. Since this time, UTA has added stops to the line, but has not installed TVMs at the new stops. As such, there are 46 stops total, 26 of which have TVMs. The stops without a TVM require passengers to pay upon boarding or obtain a ticket through other methods. The TVMs along the route are now eleven years old. UTA spent \$14,687 and 299 labor hours to maintain and repair the TVMs in the last twelve months. Additionally, UTA has had staff go to the locations and collect the cash and refill the paper ticket stock 48 times in the previous twelve months at a cost of just over \$10,000 for the year. Additionally, the revenue from TVMs has been steadily decreasing over time as shown below.

Revenue from 35 MAX TVMs



When average monthly revenue for 2016 is compared to average monthly revenue of 2018, UTA saw a 41.4% decrease in revenue from the TVMs along the 35 MAX line. Using the same metric, there was a ridership decrease along the line of 22%, which would not account for the level of decreased revenue that was seen during that period. It is likely that the decreasing functionality and reliability of the TVMs makes them increasingly unavailable and is forcing people to make other arrangements. Over the three year period UTA has seen consistent distribution of cash versus credit card revenue, where one third of all of the purchases made on a TVM have been purchased with a credit card and the other two thirds were purchased using cash. In the last twelve months, UTA has seen \$82,725 in TVM revenue, credit card purchases comprising only \$31,857 of that amount, and is spending about \$25,000 a year in maintenance and collection.

Cash users will have a direct replacement with on-board fare collection through a traditional fare box. Credit card users will have the option of using their credit card to load a prepaid card (FAREPAY), which will also include a 40% discount on the 35M and/or utilize the GoRide mobile phone app. FAREPAY can be purchased and funds added upon a second visit at many of the grocery and convenience stores in the area. There is a one-time \$3 charge for the purchase of the card, but with the 40% discount on the route, this expense is made up in only three uses and then will save a FAREPAY user \$1 per trip after each use thereafter. GoRide is an app available in the Google Play Store and the App Store that allows a user to register their credit card and pay for their fare on any mode, at any time.

Although there are options that can replace TVM credit card purchases, if the customer presents at the bus with only their credit card and did not bring a cash, there is not a direct replacement for the TVM if the rider does not have a smart phone. In order to address this concern, UTA will conduct a 30 day campaign to inform riders of the proposed change.

Public Outreach

In reviewing this proposal, UTA wanted to ensure that there was no confusion among the public as to what payment options there are moving forward after the change. On October 15, UTA posted notice on all of the TVMs and vehicles notifying passengers of the change and of the date it would be implemented (See Appendix A). All of the information presented was in English and in Spanish in accordance with UTA's Limited English Proficiency (LEP) Plan. The notice included information about the available alternatives to the TVM. The notices were posted for a 30 day period prior to the removal of any TVM.

Alternatives to Proposal

UTA has reviewed its potential options in approaching how to appropriately address the aging equipment. UTA has considered the full replacement of existing TVMs and the addition of new TVMs at stops that do not presently have them. Overall, this would require 26 new TVMs for a replacement-only method and 34 if UTA added a TVM to every stop currently without one. A recent RFP for new TVMs came in at roughly \$17,000 per TVM. Based on this, UTA would anticipate that a replacement of the existing TVMs would cost \$442,000. If UTA were to add new TVMs to stops that currently lack a TVM, UTA would need to add \$340,000 to the estimate above bringing the total expense to \$782,000. Based on current and projected budget, neither of these options are seen as viable.

Another option is to leave the existing TVMs in place and continue

to maintain them. Esthetically, operationally, and fiscally, this option is not the preferred resolution. This will still leave an inconsistent rider experience in the sense that the amenity will not be at all of the stops and they will become increasingly less reliable. The TVMs themselves, despite the maintenance performed, have begun to rust and deteriorate. The costs to repair the TVMs, which will only increase over time, and the cost to collect the cash and restock the machines are beginning to negate the actual revenue that they produce. This becomes especially true when considering that two thirds of all of the revenue collected is a cash payment, which could be easily replaced with the fare box already on the vehicle.

Demographics of Impacted Population

In UTA's 2015-2016 on-board survey of riders, UTA was able to gather about 333 responses on the 35 MAX. Below is a breakdown of the demographics of the respondents. Race and low-income status were optional survey questions, so any respondents opting to not answer the question were excluded from the table below. All of the data is the actual number surveyed, other than TVM user minority data which has been weighted.

	Total	Minority	Percent Minority
35 Max	333	111	33.3%
35 Max TVM Users*	269	81	23.1%
System-wide	16408	4081	24.9%

*Numbers are weighted

	Total	Low-income	Percent Low-income
35 Max	301	145	48.2%
35 Max TVM Users	72	30	41.7%
System-wide	13306	5915	44.5%

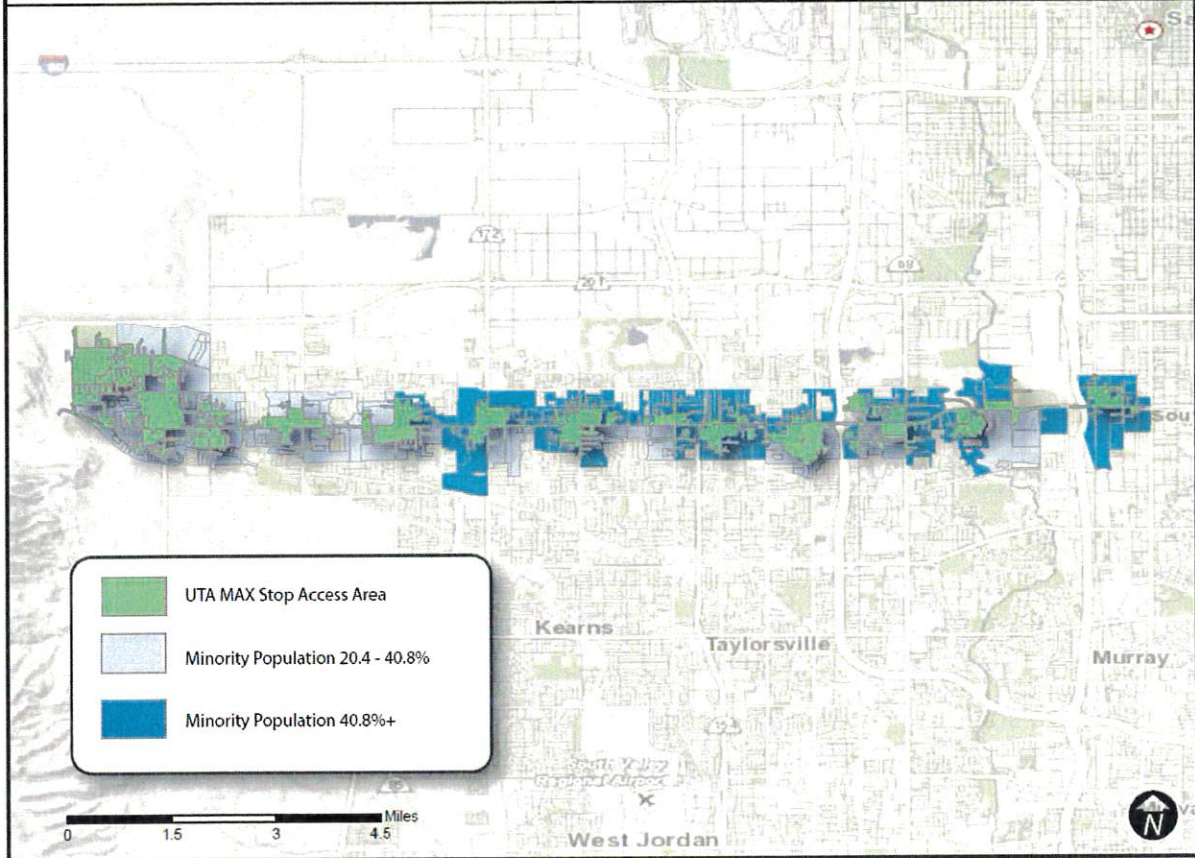
As shown in the previous table, the demographics of the 35 MAX has a composition of low-income riders at 3.7% greater than the system average and the composition of the minority population is 8.4% greater than the system average. As the data is drilled down further into respondents that used the TVMs to purchase their ticket, the data shows that 41.5% of respondents were low-income (3% *less* than the system average) and 23.1% of respondents identified as minorities (1.8% less than the system average) on the survey.

Findings

The demographics of the ridership on the route 35 MAX could indicate a possible disparate impact on minority populations and a disproportionate burden on low-income persons. However, as the data is broken down to just the TVM users surveyed on the 35 MAX, the low-income and minority populations were both *less* than the system average. As such, UTA *does not* find either a disproportionate burden or a disparate impact after reviewing the proposal.

Although the specific fare change does not meet the definition of a disparate impact or disproportionate burden, UTA took special consideration since the proposal is to remove stop-level amenities on a Title VI route. As such, UTA has gone through the policy prescribed methods to determine if the changes should proceed. UTA reviewed the potential alternatives such as leaving TVMs in their present state, replacing the existing TVMs, and installing new TVMs at every station to create a more consistent experience along the route. These options, however, were not feasible when considering the fiscal implications of maintaining the existing TVMs or replacing them with new TVMs. As such, removing the TVMs is determined to be the most reasonable solution, despite the fact that it is removing an amenity from a Title VI route.

UTA MAX Stop Access Areas - Minority Access



UTA MAX Stop Access Areas - Low Income Access





Attention

Atención

As of December 1, 2019, UTA will remove all ticket vending machines on the Route 35M-MAX

You can purchase tickets on the UTA GoRide app or with a UTA FAREPAY card. You can also pay cash or show/tap your pass on board the bus.

A partir del 1 de diciembre de 2019, UTA eliminará las máquinas expendedoras de boletos de la ruta 35M-Max

Puede comprar los boletos en la aplicación GoRide de UTA o con una tarjeta UTA FAREPAY. También puede pagar en efectivo o mostrar/apoyar su pase a bordo del autobús.



rideuta.com





Atención

A partir del 1 de diciembre de 2019, UTA eliminará las máquinas expendedoras de boletos de la ruta 35M-Max

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U T A 
rideuta.com



Attention

As of December 1, 2019, UTA will remove all ticket vending machines on the Route 35M-MAX

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rideuta.com



**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE TITLE VI EQUITY
ANALYSIS FOR APRIL 2020 CHANGE DAY**

R2020-03-03

March 25, 2020

WHEREAS, the Utah Transit Authority (the "Authority") is a large 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 Fare Equity Analysis of April 2020 Change Day ("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 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 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 March 2020.


Carlton Christensen, Chair
Board of Trustees

ATTEST:


Robert K. Biles, Secretary/Treasurer



(Corporate Seal)

Approved As To Form:


Legal Counsel

Exhibit A



Title VI Service Equity Analysis

April 2020

Utah Transit Authority

Contents

Introduction	3
Summary of Proposed Changes	3
Alignment Change – Route 606:	3
UTA Policy and Definitions.....	4
Definitions.....	4
Major Service Change	5
Evaluation and Analysis of Service and Fare Changes	5
Disparate Impact and Disproportionate Burden	6
Finding a Disparate Impact	6
Finding a Disproportionate Burden	7
Proposed Changes.....	8
Route 606.....	8
Analysis of Proposed Changes	9
Public Outreach.....	9
Findings of Analysis.....	10

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 on April 5, 2020. These changes are being proposed to fulfill the purpose of the route, which is to provide transportation to a specific facility. 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

Alignment Change – Route 606:

It is proposed to adjust the alignment of route 606 to accommodate its riders and their new place of employment. The 606 was created to provide transportation to people working at EnableUtah, a nonprofit organization that provides jobs, training and employment solutions to people with disabilities. They are opening a new facility which the 606 will now service instead of the current, closing facility. Any change of alignment greater than 25% of the current route 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

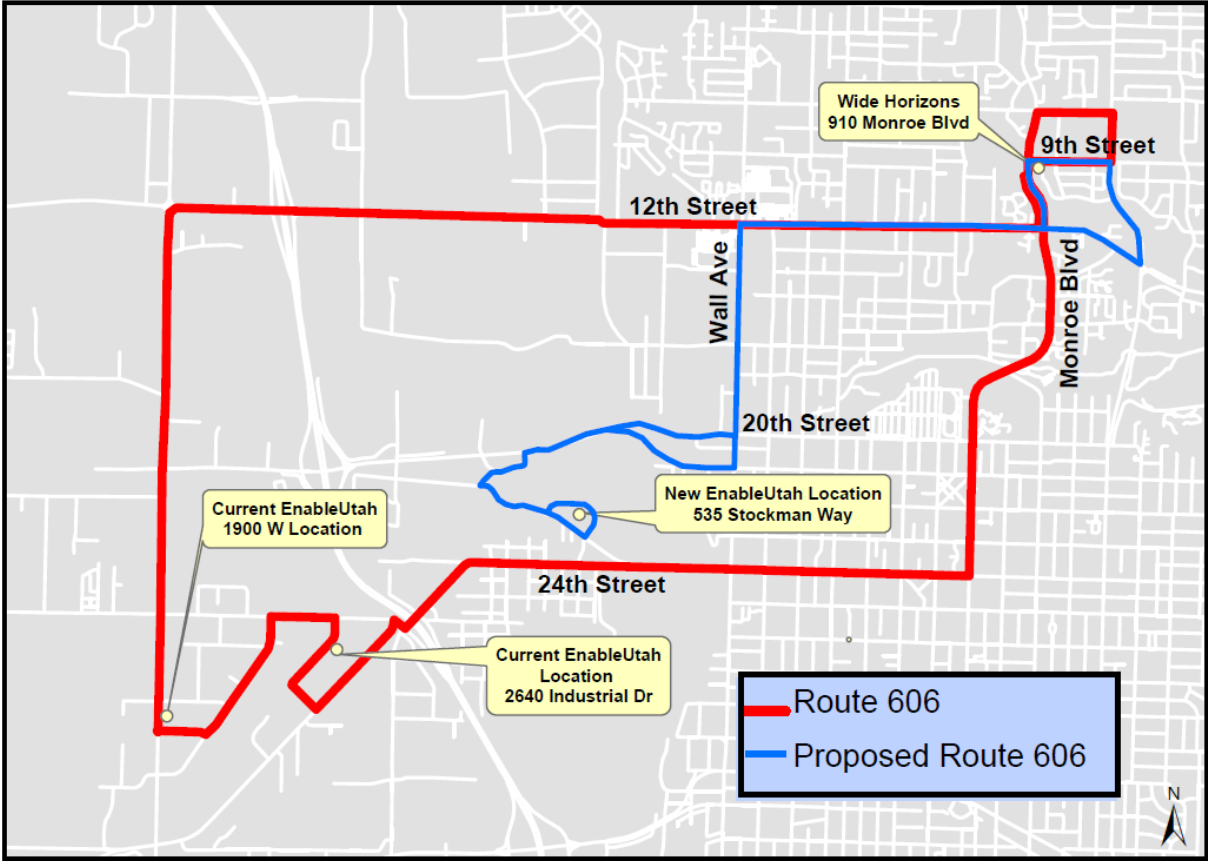
If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. UTA will also describe alternatives available to low-income passengers affected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

Proposed Change

Route 606

Route 606 was created in partnership with EnableUtah and the Wide Horizons Center. EnableUtah is a non-profit organization whose mission is to, “Enhance lives and create opportunities for individuals with disabilities by providing employment training, employment opportunities, and other resources.” Wide Horizons is a residential living facility for people with intellectual disabilities. In order to facilitate the transportation between these two entities, UTA operates route 606 which leaves the Wide Horizons Center at 8:30 am and provides a connection to two EnableUtah locations. At the end of the day, the route services the two Enable Utah facilities and returns to the Wide Horizons Center by 3:45 pm. It runs twice per day.

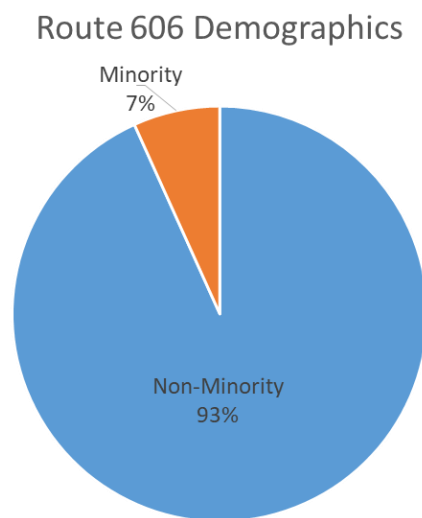
The map below shows the current route in red and the proposed route in blue. The proposed alignment will stop providing transportation to the two former locations and reroute to provide service to the new facility where EnableUtah will continue to offer employment, training and other resources.



Analysis of Proposed Change

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 included the following weighted data from the 2015-2016 onboard survey. The most recent survey conducted did not include any riders on the 606 so no data was available. None of the respondents in the survey provided income levels. However, due to the nature of the program they are accessing, it is very likely that riders of the 606 would be considered low-income.

The ridership numbers obtained for the 606 shows that the route is 93% non-minority while only 7% of ridership is non-minority. The system average for ridership is 24.9% minority, which is 17.9% greater than those impacted by this change. As such, UTA does not find a disparate impact in the proposed change.



As stated above, it is very likely that the riders of the 606 are low-income. UTA's policy states that a disproportionate burden is found when a population is negatively impacted at a rate greater than 5% when compared to the system average. In analyzing this proposed change, the only way to negatively impact the riders of this route would be to not go through with the proposed change and service locations that would no longer meet their needs. As such, UTA does not find a disproportionate burden in the proposed change.

Public Outreach

The public comment period on this proposal was from January 15 through February 17, 2020. A Standard Examiner Newspaper Ad, Ogden City Newsletter, Wide Horizons handout, blog and social media were used to announce the revised route. An open house was held from 11 a.m. to 2 p.m. at EnableUtah's Cafeteria, located at 2640 Industrial Drive in Ogden, Utah. Users of the 606 and their parents/guardians were given the opportunity to voice any concerns on the revised route via the open house, email, phone or mail. During the public hearing period, UTA did not receive any comments at the open house, mail, email or phone.

Findings of Analysis

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 change would only positively impact the riders of this route.

606 Public Hearing Statement

Utah Transit Authority provided a public comment period from January 15 to February 17, 2020 for a revised route for Route 606 in Ogden City, Utah. The proposed change was due to EnableUtah moving their two current locations to a future location at 535 Stockman Way, Ogden, UT 84401.

A Standard Examiner Newspaper Ad, Ogden City Newsletter, Wide Horizons handout, blog and social media were used to announce the revised route. An open house was held from 11 a.m. to 2 p.m. at EnableUtah Cafeteria, located at 2640 Industrial Drive in Ogden, Utah.

Over that time period, special need residents and parents of Wide Horizons were given the opportunity to voice any concerns on the revised route via the open house, email, phone or mail. Utah Transit did not receive any comments at the open house, mail, email or phone.



WE ARE REVISING ROUTE 606

UTA plans to revise routing for the 606 Bus in Weber County from Wide Horizons Center to EnableUtah Community Service Center. The revised route is due to EnableUtah relocating its 2 offices to 1 location at 535 Stockman Way, Ogden, UT 84401 (see *map on back*).

The new Proposed Schedule will be as follows:

- In the morning, the bus will depart Wide Horizons at 9:20 AM, and arrive at EnableUtah at 9:40 AM.
- In the afternoon, the bus will still depart EnableUtah at 3:05 PM, and arrive at Wide Horizons at 3:25 PM.
- The route is available 5 days a week (M-F).
- More details at www.rideuta.com/606

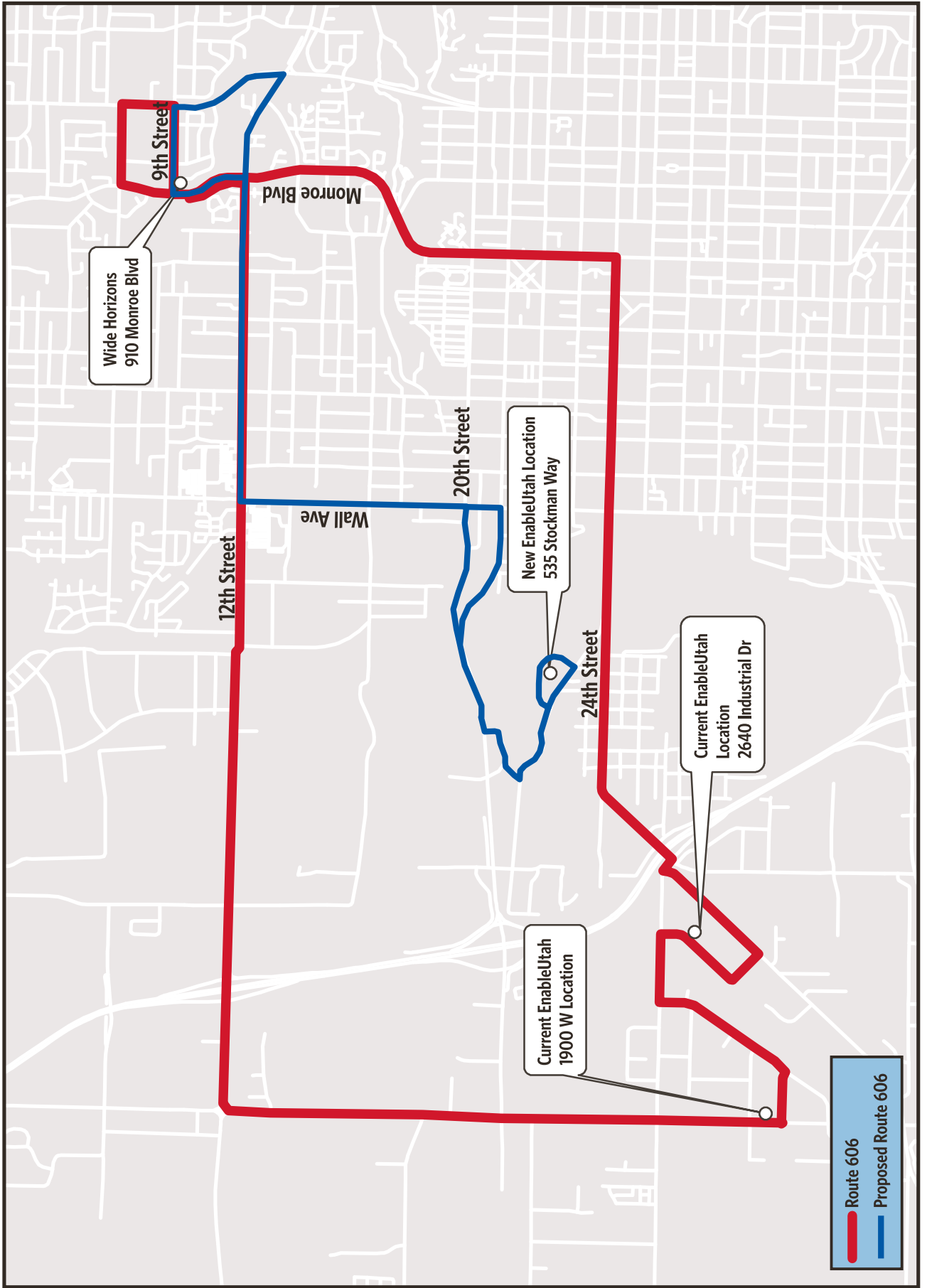
As a rider, you are entitled to voice your opinion on this change at the **Public Hearing:**

- Date: January 29, 2020
- Time: 11:00 a.m. - 1:00 pm
- Location: EnableUtah Cafeteria, 2640 Industrial Drive, Ogden UT 84401

If you cannot attend this meeting, Public Comments can be submitted through the following methods until 5 p.m. on Feb 17, 2020

- Email: hearingofficer@rideuta.com
- Phone: 801-626-1246
- Mailing: Utah Transit Authority, C/O Trevan Blaisdell, 135 West 17th Street, Building 1 - Operations, Ogden UT 84404

Route 606 - Wide Horizons/EnableUtah- Proposed Routing Change Spring 2020



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**NOTICE OF PUBLIC HEARING AND COMMENT PERIOD
UTAH TRANSIT AUTHORITY**

RE: April 2020 Service Changes. The Utah Transit Authority (UTA) is proposing one service change to local bus service in Weber/Davis County. A public hearing will be held at the locations listed below to discuss these proposed changes. A hearing is to gather feedback for changes to Bus Route 606.
Public Hearing Date & Location:

January 29, 2020
11:00 a.m. - 1:00 pm
EnableUtah Cafeteria
2640 Industrial Drive, Ogden UT 84401

At the hearing, UTA will provide an opportunity for citizens, public officials and interested agencies to comment on the proposed changes. To be included as part of the Public Hearing record, all comments must be postmarked or received by UTA by 5 p.m. on Feb 17, 2020.

Public Hearing Format:

The public hearings will be an open house format where the public can review and discuss the proposed changes with UTA representatives; public comment will be accepted anytime during the open house. To assure full participation at the hearing, accommodations for effective communication such as a sign language interpreter, printed materials in alternative formats or a language interpreter for non-English speaking participants, must be requested at least five (5) working days prior to the date of the scheduled event by contacting the UTA Hearing Officer at 801-287-2288. Requests for ADA accommodations should be directed to UTA's ADA Compliance Officer at 801-262-5626 or dial 711 to make a relay call for deaf or hearing impaired persons.

Public Comments:

Relevant maps and schedules about the proposed changes will be available at the public hearing or on the UTA Website at www.rideuta.com/606. The bus route changes will be available for public review and comment from **January 15, 2020 - February 17, 2020**. Comments must be received, postmarked or electronically submitted to UTA through the following methods by **5 pm on Feb 17, 2020** to be considered as part of the public comment record.

Email: hearingofficer@rideuta.com
Phone: 801-626-1246
Mailing: Utah Transit Authority, C/O Trevan Blaisdell
135 West 17th Street, Building 1 - Operations
Ogden, Utah 84404

Proposals are as follows:

Route 606

UTA plans to revise routing for the 606 in Weber County, which travels from Wide Horizons Center to EnableUtah relocating its two offices on 2640 Industrial Drive, Ogden, UT 84401 and 2922 S. 1900 W., Ogden, UT 84401 to have one location at 535 Stockman Way, Ogden, UT 84401

The new and improved 606 bus route will reduce travel times and stop locations. This new 606 route will continue to connect Wide Horizons and EnableUtah.

The proposed 606 morning schedule will depart Wide Horizons at 9:15 am and arrive at EnableUtah at 9:56 am. The proposed evening schedule will depart EnableUtah at 3:05 pm and arrive at Wide Horizons at 3:40 p.m. This bus route will run five days a week (M-F).

Pub: January 12, 2020.

1971277

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE TITLE VI 2020 FARE EQUITY ANALYSIS**

R2020-10-01

October 7, 2020

WHEREAS, the Utah Transit Authority (the “Authority”) is a large 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 Fare 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 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 Executive Director, staff, and counsel 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 7th day of October 2020.

DocuSigned by:

9E729E1E2C184AC

Carlton Christensen,
Chair Board of Trustees

ATTEST:

DocuSigned by:

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Exhibit A
Title VI 2020 Fare Equity Analysis



Title VI Fare Equity Analysis

Implementation Date: December 1, 2020

Utah Transit Authority

Contents

Introduction	3
Summary of Proposal	3
UTA Policy and Definitions.....	4
Definitions	4
Major Service Change.....	5
Evaluation and Analysis of Service and Fare Changes.....	5
Disparate Impact and Disproportionate Burden.....	6
Finding a Disparate Impact	6
Finding a Disproportionate Burden.....	7
Datasets Used in Analysis	7
Proposed Change.....	8
Goals of Proposal	8
Summary of Changes.....	8
Datasets Used in Analysis	10
Demographics of Impacted Populations	12
Positive Changes.....	12
Negative Changes	13
Analysis.....	13
Positive Changes.....	14
Negative Changes	15
Findings	16
System-Wide Changes	16
Positive Changes.....	16
Negative Changes	16
Appendix A: Public Comment Report	20

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 is committed to the Federal Transit Administration's (FTA) Title VI objectives set forth in Circular 4702.1B. UTA works to ensure that all services are rendered equitably and resources are distributed without regard to race, color, or national origin.

The following analysis is a review of proposed changes to UTA's fare system. This is a part of an overarching goal to simplify fares at UTA. The proposed changes would be implemented in December 1, 2020. These changes are being proposed to provide a more clear and cohesive fare system. Though the proposed changes are facially neutral, this analysis, in accordance with FTA guidelines, will consider whether the changes might have a disproportionately negative impact on minority and/or low-income populations within UTA's service area. UTA will take all prescribed and prudent steps to ensure services are equitable for the communities served as well as compliant with federal guidelines and requirements.

Summary of Proposal

UTA is proposing a series of changes to fares. These include changes to the base rates of some products, increases and decreases to discounts, creating a single fare for premium bus service, elimination of some fare media and products, and decrease in TVM paper pass offerings. These changes will ultimately decrease the number of products UTA offers and make a more clear structure for which to determine future fare changes.

UTA policy states that any change to fares constitutes a major change which requires an equity analysis be conducted.

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 service 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 weighted number of people surveyed in UTA's onboard survey. The present ridership system averages are expressed below in tabular format using the 2018-2019 ridership survey conducted by UTA.

<i>Low-Income Ridership System Average:</i>	
Total Surveyed (weighted):	124,048
Low-Income Population:	50,035
Percent Low-income:	40.3%

<i>Minority Ridership System Average:</i>	
Total Surveyed (weighted):	145,069
Minority Population:	39,384
Percent Minority:	27.1%

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.

Datasets Used in Analysis

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.” In light of this requirement, UTA has reviewed the 2018-2019 on-board survey data collected and has determined that both sample size and question structure did not yield reliable data that can be directly applied to the subset of credit card users on TVMs. Instead, UTA is using the demographics of the route geographically and the ridership data as an idea of the demographics.

Proposed Change

Goals of Proposal

The Utah Transit Authority (UTA) is proposing several changes to the fare policy and structure. UTA has been reviewing the current fare system for several years and has determined that several items were making the fare structure difficult to understand. The goals of the current effort to revise fares are:

- Simplification and streamlining of the overall public fare structure.
- Application of consistent base fare multipliers to the base fare to simplify how the pricing of other public fares and passes are determined.
- Streamline the public fare pricing structure by creating a single fare for all premium services.
- Change current discount structures to align with other discount levels.
- Eliminate some fare products for simplification.

Summary of Changes

As UTA is seeking to accomplish its goals, the following list of changes have been proposed and broken up into categories by the type of change being proposed.

- Create a single fare for premium bus services, which would;
 - Decrease: Express routes from \$5.50 to \$5.00
 - Increase: *Ski bus including Park City* from \$4.50 to \$5.00
- Apply a single base fare multiplier to passes, which would;
 - Increase: Regular monthly pass (Bus and TRAX) from \$83.75 to \$85.00 (34x \$2.50)
 - Decrease: Premium monthly pass (Bus, TRAX, FrontRunner) from \$198.00 to \$170.00 (34x \$5)
 - Replace: Round Trip with Day pass – Cost to decrease from \$6.25 to \$5.00 (2x \$2.50)
- Change current discount structures
 - Increase: Youth discount from 25% to 50%
 - Increase: Horizon card discount from 25% to 50%
 - Decrease FAREPAY bus discount from 40% to 20% to match other modes
- Simplify catalogue of fare products by *removing* the following products;
 - All token sales including the 10 pack and 50 pack of tokens
 - *Premium monthly upgrade pass*
 - *Park City 30 Day*
 - *Flex Route Punch Pass*
 - *Premium monthly pass sold on TVMs*
 - *Regular monthly pass sold on TVMs*

The tables below show how the changes being proposed by UTA were presented during the public input period and provide additional information on the purpose and alternatives available. Included in Appendix A is informational flyers made available to the public during the public hearing process that also explains the proposal.

Fare Changes

Current Fare Type	New Fare Type	Proposed Fare Change	Current Cost	New Cost	Why?
Express Bus Route	Premium Bus	Decrease in cost	\$5.50	\$5.00	2 X Base Fare (\$2.50)
Ski Bus & Park City Express	Premium Bus	Increase in cost	\$4.50	\$5.00	2 X Base Fare (\$2.50)
Regular Monthly Pass (Bus & TRAX)	Same: Regular Monthly Pass	Increase in cost	\$83.75	\$85.00	34 X Base Fare (\$2.50)
Premium Monthly Pass (Bus, TRAX, & FrontRunner)	Same: Premium Monthly Pass	Decrease in cost	\$198	\$170	34 X Premium Fare (\$5.00)
Round Trip	Day Pass	Replace, Decrease in cost	\$6.25	\$5.00	2 X Base Fare (\$2.50)

Proposed Changes to Discounts:

Pass Type	Current Discount	New Discount	Proposed Fare Change	Why?
Youth	25% on monthly passes = \$62.75	50% off Example: Regular bus fare = \$1.25	Decrease cost, more savings	Align with senior/reduced discounts
Horizon Cardholder Pass	25% on monthly passes = \$62.75	50% off Example: Regular monthly pass = \$42.50	Decrease cost, more savings	Align with senior/reduced discounts
FAREPAY Card	40% off regular Bus fare = \$1.50 one-way	20% off regular Bus fare = \$2.00 one-way	Increase in cost	Align with discount on other modes

Proposed Fare Product Eliminations:

Eliminated Fare Type	Replacement Option(s)
Premium monthly upgrade pass	Monthly Premium Pass
Tokens, including 10- and 50-packs Token sales discontinued 11/1/2020; tokens will be accepted until August Change Day 2021.	Monthly Pass, FAREPAY Card, Cash, Mobile App, One-way ticket
Park City 30-day pass	FAREPAY Card, Cash
Flex Route Deviations Punch Pass	Cash
Monthly passes sold on Ticket Vending Machines (TVMs)	Monthly passes sold at Customer Service outlets, online, or through mobile app

Datasets Used in Analysis

In accordance with guidance from the Federal Transit Administration, UTA has utilized rider surveys conducted in 2019 to determine the demographics of the people impacted by the proposed changes. The demographics data is determined based on the responses to survey questions regarding fare media usage, race, income level, and household size. UTA compared the race, ethnicity, and income levels of the respondents stating they used the fare media being impacted by the changes to that of all respondents in the survey. This comparison is used to determine if the demographics of those impacted are disproportionately low-income and/or minority. Differences in the totals between minority and low-income is due to the survey taker's ability to decide whether or not to answer specific questions while answering others.

It is of note that in the analysis of these changes that there were several fare media types that were specific enough and/or their usage so low that no survey data was able to be collected in the survey. Either nobody in the surveys conducted used the fare media or the survey did not include the option due to how little the fare media is purchased/used. The items that are unable to be analyzed include:

- Premium Bus Increases
 - Ski Bus – Seasonal service to ski resorts (Averages \$46.7k in sales during 4 month operation)
 - Park City-Salt Lake City Connect – Transportation from Salt Lake to Park City (Averages \$6,300 per month in sales)

- Removal of Fare Products
 - Premium Monthly Upgrade Pass – Employers previously only paid for a regular monthly pass and this product was a monthly pass that allowed recipients of those passes to upgrade to premium service. Proposed removal due to low usage (averages \$556 per month).
 - Park City 30 Day – 30 day pass specific to the PC-SLC Connect. Proposed removal due to low usage (averages \$715 per month).
 - Flex Route Punch Pass – Punch pass for deviations on a flex route. Proposed removal due to low usage (averages \$797 per month).
 - Premium & Regular Monthly Pass from TVM – Monthly paper pass available through TVMs. Proposed removal due to low usage (averages \$5,950 and \$545 per month respectively).

Although there isn't data available for the proposed changes above, UTA has not identified them as a high risk for a Title VI finding since the removal of the proposed fare media products are utilized at such a relatively low rate. In reviewing the public comment, there was specific feedback regarding most of the proposed changes, but some did not receive any comments. No comments were received about the premium monthly upgrade pass and the Park City 30 day pass. The feedback received is listed below.

- Premium Bus Increases
 - Two comments received in opposition to proposal. Commenters wanted the service to be free or less expensive, and expressed concern over the congestion in the canyons.
 - One commenter was in support of the proposal because an even \$5 charge is more efficient to collect than \$4.50.
 - Two comments were received suggesting that Ski and Park City fares should be included in the Premium Monthly pass.
- Removal of Fare Media
 - Flex Route Punch Pass
 - Two commenters were opposed due to concerns over the convenience of cash use being the only option.
 - One commenter suggested allowing FAREPAY be used to pay for a deviation.
 - Premium & Regular Monthly Pass from TVM
 - Three commenters opposed the removal.
 - Two commenters had suggestions on alternative retail locations where passes could be located.

Demographics of Impacted Populations

Considering the nature of the changes, UTA has divided the changes into two categories. There are positive changes that benefit those riders using that fare media and negative changes that either eliminate or increase fares for riders. These changes will be compared individually as well as cumulatively to ensure that both a change level and system-wide level review is conducted.

Positive Changes

Below are tables showing a breakdown of the number of respondents that will be impacted by the positive changes and the percentage of low-income and minority populations

Low-income - Positive Changes

Proposed Change	Low-income	Total	Percent
Express fare decrease (\$5.50 to \$5.00)	107	629	17.0%
Premium monthly fare decrease (\$198.00 to \$170.00)	1	153	0.7%
Day pass fare decrease (\$6.25 to \$5.00)	4421	12504	35.4%
Youth discount increase (25% to 50%) - all modes	2159	4551	47.4%
Youth - Bus/LR Only	1437	3593	40.0%
Horizon discount increase (25% to 50%)	248	461	53.8%
Cumulative Impact:	8373	21891	38.2%

Minority - Positive Changes

Proposed Change	Minority	Total	Percent
Express fare decrease (\$5.50 to \$5.00)	124	680	18.2%
Premium monthly fare decrease (\$198.00 to \$170.00)	61	153	39.9%
Day pass fare decrease (\$6.25 to \$5.00)	4659	14476	32.2%
Youth discount increase (25% to 50%) - all modes	3165	11082	28.6%
Youth - Bus/LR Only	3038	6862	44.3%
Horizon discount increase (25% to 50%)	166	591	28.1%
Cumulative Impact:	11213	33844	33.1%

Negative Changes

Below are tables showing a breakdown of the number of respondents that will be impacted by the negative changes and the percentage of low-income and minority populations.

Low-income - Negative Changes

Proposed Change	Low-income	Total	Percent
Regular monthly fare increase (\$83.75 to \$85.00)	386	1999	19.3%
FAREPAY bus discount decrease (40% to 20%)	4599	10547	43.6%
Remove: Round Trip	4421	12504	35.4%
Remove: All Token sales	805	1129	71.3%
Cumulative Impact:	10211	26179	39.0%

Minority - Negative Changes

Proposed Change	Minority	Total	Percent
Regular monthly fare increase (\$83.75 to \$85.00)	865	2192	39.5%
FAREPAY bus discount decrease (40% to 20%)	3009	12467	24.1%
Remove: Round Trip	4659	14476	32.2%
Remove: All Token sales	541	1299	41.6%
Cumulative Impact:	9074	30434	30%

Analysis

This section will review the potential impacts of the changes on a change-specific and system-wide level. The demographics of those impacted from the change are compared to the average of all of the surveyed riders in the 2019 onboard survey, also referred to as the system average. The system average is shown in the table below. Any changes that *negatively* impact the populace at 5% greater than the system average will require further evaluation as it may potentially cause a disproportionate burden on low-income populations and/or a disparate impact on minorities. Any item in the subsequent tables of this section that exceeds the 5% threshold will be in bold and any item has the potential of causing further analysis will be in red. Bold items not in red may indicate a disproportionate *benefit* to minority and/or low-income riders.

Low-Income Ridership System Average:	
Total Surveyed:	124,048
Low-Income Population:	50,035
Percent Low-income:	40.3%

Minority Ridership System Average:	
Total Surveyed:	145,069
Minority Population:	39,384
Percent Minority:	27.1%

Positive Changes

Low-income - Positive Changes

Proposed Change	Low-income Percentage	Difference*
Express fare decrease (\$5.50 to \$5.00)	17.0%	-23.3%
Premium monthly fare decrease (\$198.00 to \$170.00)	0.7%	-39.6%
Day pass fare decrease (\$6.25 to \$5.00)	35.4%	-4.9%
Youth discount increase (25% to 50%) - all modes	47.4%	7.1%
Youth - Bus/LR Only	40.0%	-0.3%
Horizon discount increase (25% to 50%)	53.8%	13.5%

*Difference is calculated from system average

Minority - Positive Changes

Proposed Change	Minority Percentage	Difference*
Express fare decrease (\$5.50 to \$5.00)	18.2%	-8.9%
Premium monthly fare decrease (\$198.00 to \$170.00)	39.9%	12.8%
Day pass fare decrease (\$6.25 to \$5.00)	32.2%	5.1%
Youth discount increase (25% to 50%) - all modes	28.6%	1.5%
Youth - Bus/LR Only	44.3%	17.2%
Horizon discount increase (25% to 50%)	28.1%	1.0%

*Difference is calculated from system average

As shown in the previous tables, there are many bold fields that indicate that the changes are in excess of the 5% threshold. The items in red indicate that the changes will disproportionately *benefit* either non-minority or not low-income riders. The numbers that are bold indicate that the changes will disproportionately benefit minority or low-income riders. While this does not directly trigger a finding since it does not *negatively* impact protected populations, it is an important factor to account for while making decisions that also negatively impact ridership.

*Negative Changes*Low-income - Negative Changes

Proposed Change	Low-income Percentage	Difference*
Regular monthly fare increase (\$83.75 to \$85.00)	19.3%	-21.0%
FAREPAY bus discount decrease (40% to 20%)	43.6%	3.3%
Remove: Round Trip	35.4%	-4.9%
Remove: All Token sales	71.3%	31.0%

***Difference is calculated from system average**

Minority - Negative Changes

Proposed Change	Minority Percentage	Difference*
Regular monthly fare increase (\$83.75 to \$85.00)	39.5%	12.4%
FAREPAY bus discount decrease (40% to 20%)	24.1%	-3.0%
Remove: Round Trip	32.2%	5.1%
Remove: All Token sales	41.6%	14.5%

***Difference is calculated from system average**

Unlike the positive changes, negative changes that disproportionately impact minority and low-income populations do have the direct possibility of negatively impacting those populations since they are being directly impacted by the proposal. All items in red surpass the 5% threshold and may indicate a disparate impact or disproportionate burden.

Findings

System-Wide Changes

System-wide Changes

Impacted Population	Low-income Percentage	Difference*
Low-income Positive	38.2%	-2.1%
Minority Positive	33.1%	6.0%
Low-income Negative	39.0%	-1.3%
Minority Negative	30.0%	2.9%

*Difference is calculated from system average

Based on the data collected on a system-wide level, the only figures from the cumulative impact on both positive and negative change that exceeded the 5% threshold is on minority populations impacted by positive changes. The total impacted minority population was 6.0% *greater* than the total ridership's demographics indicating that minority populations were disproportionately benefited by the change. Since these are positive changes that benefit minority populations, there were no findings on a system-wide level.

Positive Changes

There were four positive changes that exceeded 5% for low-income and four that exceeded 5% for minority populations. Five of those changes were disproportionately benefiting those populations. The remaining three proposals did not negatively impact ridership and do not mean that they directly trigger a Title VI finding. Since none of the changes are funded by the removal of another change that creates negative impacts, UTA does not find a change-level finding. UTA is, however, cognizant of who is benefiting from the specific changes and is reviewing future programs that will benefit Title VI populations.

Negative Changes

A disparate impact is determined by showing a 5% or greater negative impact on either minority or low-income populations than the system average. Additionally, changes are included if the proposed changes appear to disproportionately benefit non-minority and/or moderate to high income people. Of the changes proposed, the following are of note because they exceed the 5% threshold. The numbers expressed are the demographics of those surveyed as they relate to the survey's overall demographics.

- Regular Monthly Pass Increase – 12.4% more minority population
- Removal of Round Trip Pass – 5.1% more minority
- Removal of all Token Products – 31% more low-income and 14.5% more minority

Regular Monthly Pass Increase

It is proposed to create a single base multiplier for all monthly passes. This means that the regular base fare is multiplied by a single number to determine how much a pass would be. This would simplify the impact that any future changes to a base fare would have on all pass programs. UTA has always used multipliers for regular and premium passes. However, the rationale for how to determine the multiplier used in the pricing of the pass has not been documented and it appears that the selection of multipliers may have been set without clear justification. The Premium pass is currently 36x the base fare of \$5.50 and the Regular pass is 33.5x the base fare of \$2.50. The proposal would decrease the Premium base fare to \$5 to conform with other premium services and decrease the multiplier to 34x while increasing the Regular multiplier to 34x base fare making the Premium pass \$28 less and the Regular pass \$1.25 more.

UTA intends to perform a formal evaluation every two years of any fare adjustments including the base rate, which will impact all passes, as part of the fare policy. It will take into consideration the onboard survey's question of how many days per week each pass user takes transit. The number of days a rider uses transit will inform UTA on the number of trips per month each pass user takes. Once an average number of monthly trips is determined, the multiplier will be determined by applying a discount of approximately 20% to the average transit user. This discount mirrors the current and proposed FAREPAY discount. UTA feels that it is important to have a consistent discount structure throughout fare media and to have a formula that works to ensure equitable distribution of those discounts.

In reviewing the proposed formula, UTA found that the average monthly usage on both Regular and Premium Monthly Passes were 43 trips per month. When 43 is reduced by 20%, the resulting number is 34.4. UTA rounded this figure down to 34 and multiplied the base rate by this figure to get the proposed pass amounts. As stated previously, the multiplier may change based on subsequent increases or decreases in average rider usage, but having a practical and consistent method to determining pass rates is a part of UTA's overarching goal to simplify fare structure and policy.

In consideration of the proposal to increase the Regular Pass by \$1.25's potential disparate impact, UTA analyzed potential alternatives that might mitigate the impact. UTA considered 1) keeping the discount at 33.5, 2) decrease the multiplier to 33, 32, or even 31 to eliminate the potential for a disparate impact, or 3) proceed with the proposal as is. Although leaving the multiplier at 33.5 would be a revenue neutral option, it would impact future pass changes when looking to formulate the discount structure. If UTA were to

decrease the multiplier there would be a -\$131,819 annual projected loss for every whole number decreased from the multiplier.

UTA is also looking to introduce additional measures to alleviate the financial burden of low-income riders. Based on ridership data, minorities comprise 31.3% of all low-income riders while they only account for 26.4% of riders that are not low-income which means that low-income programs should benefit minorities at a greater rate. In light of this, UTA is seeking to mitigate any negative impacts by working to pilot a program that would create up to a 50% discount for low-income individuals and families, looking to create fare-capping on FAREPAY, which will save many people money if they use an electronic fare media instead of a paper monthly pass, and have a pilot in place that partners with human service agencies to provide free monthly passes to people that qualify. Additionally, the FAREPAY card is a pay-as-you-go option for anyone who may not use transit 34 times in the month and it has the same discount applied as the monthly pass which creates a viable option for any individual that does not have immediate funds to pay for a paper pass and/or does not use transit enough to benefit from a monthly pass.

Due to the overarching goals of UTA to create an easily replicated formula for pass cost determination and the simplification it will offer in the future, financial considerations associated with any reduction in the multiplier, and additional fare payment options that can be used as a mitigation for the increase either in place or coming on line, UTA has decided to proceed with the change as proposed despite the potential disparate impact.

Removal of Round Trip Pass

Although this removal of a round trip pass does indicate that there may be a disparate impact, there is a mitigation of the introduction of a Day Pass, which has a potential to be used more during a day and is at a decreased cost. Due to the positive replacement of this fare product, UTA does not see that this would rise to the level of a finding.

Removal of all Token Products

An important aspect of how UTA has used tokens as a fare media is related to a partnership program UTA has developed with homeless service providers. UTA has sold discounted tokens and monthly passes to non-profit entities that would then pass through those tokens and monthly passes to people experiencing homelessness. The 2019 onboard survey was conducted while this program was still in place. Since this survey was completed, UTA has switched this program from tokens to an electronic card fare media with a greater discount. Since the token program served a large number of low-income people and people experiencing homelessness disproportionately **impacts minority populations**, UTA has sorted the data to capture those persons using tokens that did not receive them from a Human

Services entity. This decreased the percentage of low-income to 66.3% low-income and 27.9% minority, which is now 26% more than the system average for low-income and .8% more than the system average for minority. Since only those purchasing the tokens directly are impacted by this change, UTA finds that the disparate impact has been negated upon further investigation.

Even with a decrease of five percentage points, there is still the potential for a disproportionate burden for tokens. UTA has considered the alternative of keeping tokens, but has determined that it has a substantial business justification associated with the cost and procedural issues associated with continuing to offer tokens. Although UTA sells many tokens, the tokens are not consistently used. As such, UTA pays between \$9,600 and \$10,000 every 12-18 months to mint 100,000 coins. There are additional costs associated with processing tokens. Tokens are only usable on bus where there is a fare box to collect cash. Not only does this mean that a rider using TRAX would need to board a bus first to obtain a transfer before boarding the train, but it also means that UTA must sort tokens out of the cash received on the buses. Once sorted, UTA staff must collect and redistribute the tokens to all of the vendor locations in order to recirculate them. The administrative and financial costs associated with tokens is large enough that UTA has determined that proceeding with the change is justifiable considering the number and type of alternatives available. Alternatives include cash, day passes, monthly passes, and most beneficial would be a transition to FAREPAY. This fare medium would include a 20% discount which is better than the 10% discount offered on 10 packs of tokens.

A mitigating factor of this proposed change is that although token sales would stop in December 1, 2020, the tokens themselves will be accepted until August Change Day 2021. This should mitigate the impact on riders with tokens in-hand and allow them to get the value from their purchase. Due to these factors, UTA has determined to continue with the proposed change despite the potential disproportionate burden.

Appendix A: Public Comment Report

UTA Proposed Fare Changes Public Involvement Report

Updated 09.04.2020

Introduction

In July 2020, the Utah Transit Authority (UTA) proposed several changes to the fare policy and structure. Those proposed changes can be reviewed in Appendix 1 of this report. The agency held a 30-day public comment period from July 22 through August 21 with multiple opportunities for the public to engage in the input process, including a virtual public hearing on August 6. This report details public involvement and feedback on the proposed changes.

Part 1: Public Engagement Efforts

Engagement Overview

Component	Proposed Timeline	Additional Detail
Public comment period	July 22 – August 21	30-day period required. Public notice was published. Comment accepted via email, mail, online form, phone, and in-person at Customer Service locations.
Public hearing (Virtual)	August 6, 6pm	15 days after public comment period announced, this public hearing was held virtually over Zoom. The Fares Department presented information about proposed changes and answered questions. Registered participants were invited to provide public comment during the meeting. A recording was made available following the event.
Customer Service Open House	July 22 – August 21	Customer service offices across the service area (4 locations) supported ongoing informal “open house” in-person opportunities for members of the public to learn more and provide comment onsite.
Virtual engagement	July 22 – August 21	Available throughout the comment period online, included virtually accessible information and feedback opportunities through OpenUTA.

The public comment period was held for 30 days from July 22 through August 21. Multiple methods for sharing information on the proposed changes and submitting official comment on the proposed changes were made available to the public. Methods for public comment included email, mail, phone, OpenUTA online comment form, the virtual public hearing, and in-person at customer service locations in three counties. Information on proposed changes was shared widely via newspapers of general circulation in the service area, UTA’s website, and UTA’s social media platforms, including Instagram, Facebook, and Twitter. The virtual public hearing on August 6 was broadcasted over Zoom and livestreamed to UTA’s Facebook page. A recording of the virtual public hearing was made available for public viewing following the live event via UTA’s website, YouTube channel, and Facebook page.

In addition to these media platforms, UTA promoted the public comment period through partners. The Community Engagement Department shared complete information about the proposed changes and methods for submitting public

comment with internal departments at UTA who were asked to share with their teams and networks. The following table describes internal engagement and information-sharing.

UTA Department	External Share
PR & Marketing	FAREPAY users, GovDelivery Subscribers, Connected Newsletter (elected officials and local representatives), Salt Lake Tribune, Central Wasatch Commission, media release to press
Planning	Planning partners, MPOs
Travel Training	Catholic Community Services, International Rescue Committee, other partners
Business Development & Sales	Pass Partners, Low-Income Pilot Program Partners, Homeless-serving organizations
Civil Rights	DBE partners, other community organizations, CAT committee & disability community
Special Services, TRAX, FrontRunner, Mt. Ogden Business Unit, Salt Lake Business Unit, Timpanogos Business Unit	<i>Internal share</i>

The Community Engagement Department also shared information about the proposed changes and methods for submitting public comment directly with external partners, who were also asked to share with their networks.

External Partner	Intended Audience
UTA Citizens Advisory Committee (CAC)	General public, community members
Univision	Latinx and Spanish-speaking community
Art in Motion Partners	Youth, general community
Salt Lake Valley Coalition to End Homelessness	Homeless service providers, other community partners
Utah Nonprofits Association	Nonprofit community-based organizations
Division of Multicultural Affairs	Community partners, historically underserved communities
Department of Workforce Services	Horizon cardholders
Westview Media	Salt Lake City west side community <i>West View Media invited UTA to participate in a digital town hall broadcast via Facebook Live on August 11.</i>
Glendale Community Council	Glendale community residents/riders
Poplar Grove Community Council	Poplar Grove community residents/riders
Salt Lake City Corporation	SLC residents
Wasatch Front Regional Council	Transportation sector, general public
Utah Department of Health	Health partners, community health workers, historically underserved communities
Utahns Against Hunger	Historically underserved communities

Public Hearing Notice

A detailed public hearing notice was distributed via newspapers of general circulation for publication on July 22, including the Daily Herald (Utah County), Tooele Transcript (Tooele County), Standard Examiner (Weber County), Deseret News, and the Salt Lake Tribune. The public notice was also shared via the Utah Public Notice Website. Proofs are included in Appendix 2.

News Media

Information regarding proposed fare changes and engagement opportunities was shared widely with the news media. At least 10 sources covered the story. A record of news media coverage on the proposed fare changes is included in Appendix 3.

Social Media Platforms

The following posts were shared on UTA’s Facebook, Instagram, and Twitter platforms.



July 22: Boosted posts through August 24.

- 16,478 People Reached
- 2,198 Engagements
- 82 Comments
- 87 Reactions
- 56 Shares

“UTA is proposing several changes to the fare policy and structure. A 30-day public comment period is now open, from July 22 through August 21.

Let us know what you think! Read more about how to submit a comment at www.rideuta.com/farechanges”

It's time for another update!



Give us your input on proposed fare changes at our public hearing

August 3

- 2,504 People Reached
- 295 Engagements
- 9 comments
- 21 reactions
- 8 shares

“Proposed Fare Changes Alert! ✨ A public hearing will be held on Thursday, August 6 at 6 p.m. This meeting will be held on Zoom at the link below and live-streamed on Facebook and YouTube. The public hearing meeting will provide an overview of the proposed fare changes, take questions, and accept public comment.

Watch live here:

<http://ow.ly/eeUh50AJvR3>

Register to provide a public comment during the hearing here:

https://us02web.zoom.us/j/81254428986/register/WN_hIc1GeVQFeLcLmIEyyE5Q

For more information on proposed fare changes, visit rideuta.com/farechanges”

Virtual Public Hearing

The virtual public hearing was held on Thursday, August 6 at 6pm. The event was held over Zoom webinars and was broadcast on the RideUTA Facebook Live feed. Three individuals from the public registered and attended the live event to make a comment on the broadcast. Interwest Interpreting was on the line to provide ASL interpretation. A recording of the virtual public hearing was also available for viewing following the events on the UTA Facebook and YouTube channels.

Facebook:

- 2,552 reached
- 978 views
- 328 engagements
- 14 reactions
- 28 comments
- 4 shares
- Link to the event on Facebook:
<https://www.facebook.com/RideUTA/videos/1162246330817529/>

Youtube:

- 83 Views
- 3 Likes
- 0 Comments

- Link to the event on YouTube:
<https://www.youtube.com/watch?v=nLEU7MdfWo>

Other Social Media: West View Media’s Digital Town Hall

West View Media invited UTA to participate in a digital town hall broadcast via Facebook Live on Tuesday, August 11 at 4pm. 71 people watched the broadcast live; 1,849 people have watched at least some portion of the broadcast since the event. The total reach on all of West View Media’s platform with this event was just over 6,800.

- Link to event:
<https://www.facebook.com/watch/?v=1779252368879355&extid=70HeZmQ6Ph28CAFO>

Website

Detailed information was shared via UTA’s website. A carousel on the main page directed the public to detailed information on the proposed changes at rideuta.com/farechanges. The public hearing information was also included on the public hearing page of the UTA website. Supporting information in both English and Spanish was shared via the website to clearly communicate the proposed changes – these documents can be reviewed in Appendices 4 and 5 of this report. A total of 3,602 page views were logged from July 22 – August 21.

Customer Service Outreach

To provide an in-person avenue for the public to engage with the information, particularly members of the community with lower access to technology, including internet, computers, and smartphones, the Community Engagement Department partnered with 4 UTA customer service locations – Mt. Ogden, Meadowbrook, Downtown Salt Lake – Lost & Found, and Timpanogos – to hold informal “open house” opportunities. Information shared onsite at customer service locations can be reviewed in Appendix 5 of this report. Members of the public were invited during business hours to review the information, ask available agents questions about the proposed changes, and submit their official public comment onsite. Seven official public comments were submitted through this method, but more individuals did engage with the information and chose to not leave a comment.

Part 2: Public Comment Analysis

Engagement by the Numbers

Mode	Comments (#)
Email	29
Mail	0
Customer Service – Phone	7 <i>Board received - 1</i>
Customer Service – Onsite	7
OpenUTA	74
Virtual Public Hearing	3
Total Official	120
<i>Unofficial</i>	
<i>Social Media</i>	55
<i>Other</i>	4

Public Comment Overview

Theme	Against	Support	Other
General	24	27	
Regular Monthly	7		1
Premium	1	6	
Express Bus	1	3	
Day Pass	1	2	
FAREPAY	20	1	1
Tokens	7	3	3
PC-SLC	2		1
Horizon	1	1	
Discounts		4	2
Deviation Punch Pass	2		1
Ski Service	2	1	2
Outlets/POS	3		2
Other/Neutral/Suggestion	2		34
Policy/Fare Structure			10
HIVE			2
Fare enforcement			4
Fare media			4
Totals	73	48	67

The table above lists the themes of the comments as they relate to the proposed fare changes in the left-hand column. Each comment was coded for themes, as well as sentiment to understand if the comment was in support of or against the proposed changes. The numbers in each column represent the number of comments related to a theme and whether they were against or supportive of the proposed changes, or had an “other” category assigned. Many comments were multi-themed and some expressed varying sentiment depending on which change they were referencing. There were many comments that were categorized as “Other”, which includes comments that made neutral statements, asked a question, or provided suggestions and recommendations for changes outside of the scope of the current fare change proposal. Questions from the public were responded to when possible (contact information provided). When examining the comments in whole, more comments were opposed to the proposed changes than were supportive of the proposed changes (73 compared to 48). Dissatisfaction with the proposed fare changes were largely due to increasing fares on certain passes, however the proposed reductions in other fare types were appreciated by the public, as were genuine efforts to simplify the fare structure. Each theme is reviewed in more detail below and further analysis of the sentiment is provided to glean which proposed changes are favorable, which are less so, and why.

Public Comment Detailed Review

Theme	Against	Support
General <i>24 Against,</i> <i>27 Support</i>	Affordability <ul style="list-style-type: none"> Disproportionately affects lower income riders, working class riders Public transit is not a money-making business Ridership	Simplification & clarification <ul style="list-style-type: none"> Easier to remember and calculate Frequent riders benefit <ul style="list-style-type: none"> Good deal for those who ride often

	<ul style="list-style-type: none"> • Lower costs to encourage ridership • Changes do not do enough to encourage ridership • Should be incentivizing ridership over driving cars • Some of the changes will encourage people to switch to cars <p>Timing</p> <ul style="list-style-type: none"> • Not the right time • Keep the same 	<p>Proposed decreases</p> <ul style="list-style-type: none"> • Agreement with the proposed decreases in fare <p>Fair</p>
<p>Regular Monthly <i>7 Against, 0 Support</i></p>	<p>Timing</p> <ul style="list-style-type: none"> • Bad timing • Economy is struggling right now • Wait for a change day <p>Ridership</p> <ul style="list-style-type: none"> • Disincentives ridership • Consistent riders take on more cost <p>Detrimental Increase</p> <ul style="list-style-type: none"> • Unhappy with price increase • Some people (including essential workers) live paycheck to paycheck - make more discounts available • Passing on fare increases to regular monthly riders while decreasing premium/express service • Will be economically wrong to put upon those at lower economic levels who must take buses <p>Multiplier</p> <ul style="list-style-type: none"> • Multiplier should be based on x25 for the work week 	
<p>Premium <i>1 Against, 6 Support</i></p>	<p>Multiplier</p> <ul style="list-style-type: none"> • Multiplier should be based on x25 for the work week 	<p>Fare Reduction</p> <ul style="list-style-type: none"> • Price reduction is appreciated • Was priced too high previously • More affordable pass
<p>Express Bus <i>1 Against, 3 Support</i></p>	<p>Ridership</p> <ul style="list-style-type: none"> • Prioritizing the wrong riders • Regular bus riders will be less inclined to ride 	<p>General Support</p> <ul style="list-style-type: none"> • Approve of the changes
<p>Day Pass <i>1 Against, 2 Support</i></p>	<p>Cost</p> <ul style="list-style-type: none"> • Still too expensive 	<p>Fare Reduction</p> <ul style="list-style-type: none"> • Approve of the changes <p>Ridership</p> <ul style="list-style-type: none"> • Incentivizes ridership and disincentives driving
<p>FAREPAY <i>20 Against,</i></p>	<p>Timing</p> <ul style="list-style-type: none"> • Current economy 	<p>General Support</p> <ul style="list-style-type: none"> • Consistent

<p><i>1 Support</i></p>	<ul style="list-style-type: none"> • Bad for the community <p>Regular Riders</p> <ul style="list-style-type: none"> • Working people who take the bus a lot will be negatively impacted • Harmful to, extra burden for regular bus riders • Why should riding the bus and train cost the same? • Some riders do not have alternatives <p>Ridership</p> <ul style="list-style-type: none"> • Encourage ridership with lower fares right now • Ridership will be affected • People may drive more/buy a car • FAREPAY discounts build loyalty <p>Detrimental Increase</p> <ul style="list-style-type: none"> • Lower rates • Discounts are needed • Keep the same • Drastic price increase • Could impact riders' ability to pay for other essential needs • Could impact riders' ability to afford to ride • Short trips are unaffordable at this price 	
<p>Tokens <i>7 Against,</i> <i>3 Support</i></p>	<p>Inconvenience</p> <ul style="list-style-type: none"> • Do not discontinue/eliminate • Plan for replacing/phasing out <p>Access</p> <ul style="list-style-type: none"> • Provide access for more people (kids, dependents); • Good to have as an alternative to exact change/cash • Easy to donate <p>Affordability</p> <ul style="list-style-type: none"> • Service providers • Low-income riders use these 	<p>General Support New program</p> <ul style="list-style-type: none"> • New low income pilot program is a better deal
<p>PC-SLC <i>2 Against,</i> <i>0 Support</i></p>	<p>Detrimental Increase</p> <ul style="list-style-type: none"> • Not strictly ski service • Harmful to working class commuters • Negative impact to monthly budgets • Keep fares lower 	
<p>Horizon <i>1 Against,</i> <i>1 Support</i></p>	<p>General Opposition</p> <ul style="list-style-type: none"> • Disagreement with a consistent discount 	<p>General Support</p>
<p>Discounts <i>0 Against,</i> <i>4 Support</i></p>		<p>General Support</p> <ul style="list-style-type: none"> • Lowered student discount • Appreciate the 50% discount alignment

Deviation Punch Pass <i>2 Against, 0 Support</i>	Inconvenience <ul style="list-style-type: none"> • Don't carry cash • Creates difficulties 	
Ski Service <i>2 Against, 1 Support</i>	Affordability & Ridership <ul style="list-style-type: none"> • Encourage people to ride by decreasing cost • Help get cars out of the canyons • Needs to be cheaper 	Efficiency <ul style="list-style-type: none"> • \$5 on ski will improve efficiency
Outlets/Point of Sales <i>3 Against, 0 Support</i>	Access <ul style="list-style-type: none"> • Monthly pass should be available at TVMs 	

“Other” Comments

Many comments were categorized as “other” because they fell outside the current proposed fare changes. There were many valuable ideas expressed and could be considered as additional improvements to the UTA fare structure policy are made.

Fare structure improvements

Existing Products

- Clarify HIVE pass changes
- Tokens: allow a phase-out period for tokens and redeem for other forms of fare
- Increase transfer time to 3 hours
- Use FAREPAY card to pay for transfers
- All hour group passes
- Include ski service on premium passes (i.e. ECO, ED)
- Review pass partner options (i.e. ECO, ED) to increase fairness - determine price based on service availability
- Express Bus: keep cost lower for paying in advance

Flexibility

- Build in more flexibility in buying passes not on a calendar month (30-day pass)
- Fare structure should allow for rolling 30-day passes, 3-day, 7-day (consider other transit agency fare structures)
- Implement distance-based fare
- Implement fare capping

Point of Sale/Outlets

- Additional, convenient locations to buy passes, including tap cards
- Extended and add after-work hours
- Availability at grocers (i.e. Smith's)
- Keep outlets available – some have limited access to internet/mobile

Cost & Discounts

- Implement \$1 fare
- Move toward a free/no cost transit system
- Explore additional discounts
- Allow low-income riders to access 50% discount
- Decrease FrontRunner fare
- Charge fair market value
- Do not lower fares

Fare media

- Advocate for cashless, tap-on, debit/credit fare media
- Unified applications for using transit
- Eliminate high touch products (i.e. paper transfers, punch cards, cash)
- Make FAREPAY reloads available at TVMs

Timing/Current Events

- Lower fares during pandemic
- Be sensitive to unusual times

Encouraging ridership

- Make transit more affordable than driving
- Ridership will grow only when there is an incentive (savings)
- Air quality and congestion are at stake

Strategy

- Link fares to (current) air quality
- Communicate changes and help people transition to new structure
- Have fares be in line with fuel trends
- Explore public private partnerships and downtown resident passes
- Focus on clean and safe operations
- Explore what other transit systems offer (i.e. Portland)
- Advance fare technology – more innovative, flexible structure
- Advance FAREPAY system
- Improve equity in fare structure
- Find more solutions to save transit
- Disclose paratransit fare

Fare Enforcement

- Fare enforcement and fare payment is an issue that should be addressed before raising fares on paying passengers
- Increase police presence on transit

Outside scope

- Service and frequency of the UTA system

- Improve service first, then revisit fare increases
- Prioritize infrastructure for transit
- Canyon service in the summer
- Transit is a burden and needs to stop growing

Summary of Findings

Through the public engagement process, 120 official public comments were received. Despite a relatively low total number of comments, the feedback received is valuable. Outreach during COVID-19 presented challenges in reaching the public, and with lower ridership, it's not surprising engagement on these proposed changes was less than we may have liked.

When analyzed for sentiment, more comments were unresponsive of the proposed changes than were supportive. The most common categories that received comments included general comments, FAREPAY, tokens, regular monthly passes, and premium monthly passes. It is important to note that nearly 17% of the total comments (N=120) were unresponsive specifically of the increase to FAREPAY on bus. Many comments did recognize UTA's efforts to simplify the complicated fare structure. Efforts to decrease fares were appreciated, however areas where fares were increasing or products were being eliminated drew opposition. A large number of comments fell outside the scope of the current proposed fare changes, however provided valuable input and feedback on fares and UTA more broadly. This information has been included in the report for continued consideration.

There is a valid reason to reconsider some of the proposed fare increases, including economic depression throughout our region as a result of the pandemic, particularly impacting lower-income and working class public. These changes will affect riders who regularly use bus service for transportation often with no alternatives. Comments about both increases to FAREPAY and the regular monthly pass expressed that the timing of these proposed increases was poor.

With any further consideration of proposed fare changes, it is important to recognize the current climate, as well as a commitment to maintain access and affordability for those who need public transit services. Incentivizing ridership now and in the near future will be important for community sustainability and resilience.

All individual comments are included as part of the official Public Involvement Record and can be made available upon request.

Appendix 1 - Proposed Changes

The goals of the proposed public fare changes at UTA include:

- Simplify and streamline the overall public fare structure.
- Apply consistent multipliers to the base fare to simplify how the pricing of other public fares and passes are determined.
- Streamline the public fare structure by creating a single fare for all premium bus services.
- Change current discount structures to align with other discount levels.
- Eliminate some fare products for simplification.

The proposed changes aim to simplify the fare structure by applying consistent multipliers to the base fare to set pricing for premium fares and passes.

- The Base Fare is the amount charged for a base adult one-way fare; it is currently \$2.50 and is not changing.
- Premium Bus Services: to now include Express Bus, Ski Bus, and the Salt Lake - Park City Express
 - Premium Bus Services to be consistently priced at two times the base fare = \$5.00 (or 2 X \$2.50)
- Monthly and Day Pass Fares:
 - Regular Monthly Fare (Bus & TRAX) = \$2.50 x 34 trips
 - Premium Monthly Fare (Bus, TRAX, & FrontRunner) = \$5.00 X 34 trips
 - Day Pass Fare = \$2.50 X 2

Current Fare Type	New Fare Type	Proposed Fare Change	Current Cost	New Cost	Why?
Express Bus Route	Premium Bus	Decrease in cost	\$5.50	\$5.00	2 X Base Fare (\$2.50)
Ski Bus & Park City Express	Premium Bus	Increase in cost	\$4.50	\$5.00	2 X Base Fare (\$2.50)
Regular Monthly Pass (Bus & TRAX)	Same: Regular Monthly Pass	Increase in cost	\$83.75	\$85.00	34 X Base Fare (\$2.50)
Premium Monthly Pass (Bus, TRAX, & FrontRunner)	Same: Premium Monthly Pass	Decrease in cost	\$198	\$170	34 X Premium Fare (\$5.00)
Round Trip	Day Pass	Replace, Decrease in cost	\$6.25	\$5.00	2 X Base Fare (\$2.50)

Pass Type	Current Discount	New Discount	Proposed Fare Change	Why?
Youth	25% on monthly passes = \$62.75	50% off Example: Regular bus fare = \$1.25	Decrease cost, more savings	Align with senior/reduced discounts
Horizon Cardholder Pass	25% on monthly passes = \$62.75	50% off Example: Regular monthly pass = \$42.50	Decrease cost, more savings	Align with senior/reduced discounts
FAREPAY Card	40% off regular Bus fare = \$1.50 one-way	20% off regular Bus fare = \$2.00 one-way	Increase in cost	Align with discount on other modes

Eliminated Fare Type	Replacement Option(s)
Premium monthly upgrade pass	Monthly Premium Pass
Tokens, including 10- and 50-packs <i>Token sales discontinued 11/1/2020; tokens will be accepted until August Change Day 2021.</i>	Monthly Pass, FAREPAY Card, Cash, Mobile App, One-way ticket
Park City 30-day pass	FAREPAY Card, Cash
Flex Route Deviations Punch Pass	Cash
Monthly passes sold on Ticket Vending Machines (TVMs)	Monthly passes sold at Customer Service outlets, online, or through mobile app



**NOTICE OF PUBLIC HEARING AND COMMENT PERIOD
UTAH TRANSIT AUTHORITY**

RE: Proposed Fare Changes. The Utah Transit Authority (UTA) is proposing several changes to the fare policy and structure. The goals of the proposed changes are to streamline and simplify fare options and payment, including incorporating consistent multipliers on the base fare to determine daily, monthly, and premium service fares. Proposed changes also include implementing consistent discount rates and eliminating several fare products to simplify options. A 30-day public comment period will occur July 22 through August 21 and one virtual public hearing will be held to gather feedback. Public Comments: Relevant information about the proposed changes will be available at the Public Hearing and on the UTA Website at www.rideuta.com/farechanges. The proposed fare changes will be available for public review and comment from July 22, 2020 through August 21, 2020. Comments must be received, postmarked or electronically submitted to UTA through one of the following methods by 5 p.m. on August 21, 2020 to be considered as part of the public comment record.
Email: hearingofficer@rideuta.com
Phone: 801-743-3882
Mailing: Utah Transit Authority, C/O Megan Waters, 669 W. 200 S., Salt Lake City, UT 84101
Website: www.rideuta.com/farechanges

Public Hearing Date & Format: There will be a public hearing held on Thursday, August 6 at 6pm. Due to COVID-19 gathering restrictions, and in compliance with Governor Herbert's executive order regarding open meetings laws, this will be an all-electronic Zoom meeting with no anchor location. The public hearing meeting will provide an overview of proposed changes, take questions, and accept public comment from participants.

If you wish to view and listen (only) to the formal meeting, you can do so live at the following UTA platforms:
YouTube: <https://www.youtube.com/channel/UCjbc4P4VvJWg9GnTOLgSuA>
Facebook: <https://www.facebook.com/RideUTA/>
If you would like to provide a public comment during the public hearing on August 6, please register to join via Zoom any time prior to the hearing's conclusion: https://us02web.zoom.us/join/register/WN_j1ClG6VQF6LCLmIEyE5Q
Registered participants will be given an opportunity to speak in a specified order. To ensure all participants have an opportunity to speak, comments are limited to two minutes per person. If you wish to leave additional comments, please call 801-743-3882, or send your comments to hearingofficer@rideuta.com. All who wish to view the hearing following the event may do so through our YouTube channel or Facebook page. A link to the public hearing recording will be made available on the website.

Public Open Houses
UTA Customer Service locations will host information about proposed fare changes onsite in an informal public open house format during the public comment period from July 22 through August 21. Members of the public who wish to learn more and leave a comment in-person can do so at the following locations during the hours listed:

- Timpanogos**
1110 S. Geneva Rd
Orem, UT 84058
(801) 227-8923
Hours: Monday-Friday, 8:30 a.m. to 5 p.m.
- Downtown Salt Lake City**
250 South 600 West
Salt Lake City, UT 84101
(801) 287-4664
*Lost and Found Location
Hours: Monday-Friday, 8:30 a.m. to 5 p.m.
- Meadowbrook**
3600 South 700 West
Salt Lake City, UT 84119
(801) 262-5626
Hours: Monday-Friday, 8:30 a.m. to 5 p.m.
- Ogden Transit Center**
2393 Wall Avenue
Ogden, UT 84401
(801) 626-1207
Hours: Monday-Friday, 8:30 a.m. to 5 p.m.

To assure full participation at the hearing and during the public comment period, accommodations for effective communication such as a sign language interpreter, printed materials in alternative formats or a language interpreter for non-English speaking participants must be requested at least five (5) working days prior to the date of the scheduled event by contacting the UTA Hearing Officer at 801-244-3271. Requests for ADA accommodations should be directed to UTA's ADA Compliance Officer at 801-262-5626 or dial 711 to make a relay call for deaf or hearing impaired persons.

- Proposals are as follows:
1. Goals of fare changes at UTA:
 - a. Apply a uniform base fare multipliers to simplify fare structure
 - b. Create a single fare for premium bus services
 - c. Change current discount structures to align with other discount levels
 - d. Eliminate some fare products for simplification
 2. Key Terms
 - a. Base fare is not changing = \$2.50. Base fare is what is charged for base adult one-way fare.
 - b. Premium Bus Services = Express Bus, Ski Bus, and Park City Express
 - i. Premium Services are two times base fare = \$5.00 (or 2 X \$2.50)
 - c. Monthly and Day Pass Fares:
 - i. Regular Monthly Fare (Bus & TRAX) = \$2.50 x 34
 - ii. Premium Monthly Fare (Bus, TRAX, & FrontRunner) = \$5.00 X 34
 - iii. Day Pass Fare = \$2.50 X 2
 3. Proposed Changes to Fares
 - a. Pass Changes:
 - i. Express Route: \$5.00
 - ii. Ski Bus & Park City: \$5.00
 - iii. Regular Monthly Pass (Bus & TRAX): \$85.00
 - iv. Premium Monthly Pass (Bus, TRAX, & Front Runner): \$170.00
 - v. Round Trip: \$5.00
 - b. Proposed Changes to Discounts
 - i. Youth: 50% Off Fare
 - ii. Horizon Cardholder: 50% Off Regular Monthly Passes
 - iii. FAREPAY Card: 20% off regular bus
 - c. Proposed Fare Product Elimination
 - i. Premium Monthly Upgrade Pass
 - ii. Tokens, including 10- and 50-packs
 - iii. Park City 30-Day Pass
 - iv. Flex Route Deviations Punch Pass
 - v. Monthly passes sold on Ticket Vending Machines (TVMs)

Pub: July 22, 2020

1976876

Ad Number 0001294969-01 **Ad Type** Legal Liner
Ad Size 3 X 115 li **Color**

WYSIWYG Content

**NOTICE OF PUBLIC HEARING AND COMMENT PERIOD
UTAH TRANSIT AUTHORITY**

RE: Proposed Fare Changes. The Utah Transit Authority (UTA) is proposing several changes to the fare policy and structure. The goals of the proposed changes are to streamline and simplify fare options and payment, including incorporating consistent multipliers on the base fare to determine daily, monthly, and premium service fares. Proposed changes also include implementing consistent discount rates and eliminating several fare products to simplify options. A 30-day public comment period will occur July 22 through August 21 and one virtual public hearing will be held to gather feedback. Public Comments: Relevant information about the proposed changes will be available at the Public Hearing and on the UTA Website at www.rideuta.com/farechanges. The proposed fare changes will be available for public review and comment from July 22, 2020 through August 21, 2020. Comments must be received, postmarked or electronically submitted to UTA through one of the following methods by 5 p.m. on August 21, 2020 to be considered as part of the public comment record.
Email: hearingofficer@rideuta.com
Phone: 801-743-3882
Mailing: Utah Transit Authority, C/O Megan Waters, 669 W. 200 S., Salt Lake City, UT 84101
Website: www.rideuta.com/farechanges

Public Hearing Date & Format: There will be a public hearing held on Thursday, August 6 at 6pm. Due to COVID-19 gathering restrictions, and in compliance with Governor Herbert's executive order regarding open meetings laws, this will be an all-electronic Zoom meeting with no anchor location. The public hearing meeting will provide an overview of proposed changes, take questions, and accept public comment from participants.

If you wish to view and listen (only) to the formal meeting, you can do so live at the following UTA platforms:
YouTube: <https://www.youtube.com/channel/UCjbc4P4VvJWg9GnTOLgSuA>
Facebook: <https://www.facebook.com/RideUTA/>
If you would like to provide a public comment during the public hearing on August 6, please register to join via Zoom any time prior to the hearing's conclusion: https://us02web.zoom.us/join/register/WN_j1ClG6VQF6LCLmIEyE5Q
Registered participants will be given an opportunity to speak in a specified order. To ensure all participants have an opportunity to speak, comments are limited to two minutes per person. If you wish to leave additional comments, please call 801-743-3882, or send your comments to hearingofficer@rideuta.com. All who wish to view the hearing following the event may do so through our YouTube channel or Facebook page. A link to the public hearing recording will be made available on the website.

Public Open Houses
UTA Customer Service locations will host information about proposed fare changes onsite in an informal public open house format during the public comment period from July 22 through August 21. Members of the public who wish to learn more and leave a comment in-person can do so at the following locations during the hours listed:

- Timpanogos**
1110 S. Geneva Rd
Orem, UT 84058
(801) 227-8923
Hours: Monday-Friday, 8:30 a.m. to 5 p.m.
- Downtown Salt Lake City**
250 South 600 West
Salt Lake City, UT 84101
(801) 287-4664
*Lost and Found Location
Hours: Monday-Friday, 8:30 a.m. to 5 p.m.
- Meadowbrook**
3600 South 700 West
Salt Lake City, UT 84119
(801) 262-5626
Hours: Monday-Friday, 8:30 a.m. to 5 p.m.
- Ogden Transit Center**
2393 Wall Avenue
Ogden, UT 84401
(801) 626-1207
Hours: Monday-Friday, 8:30 a.m. to 5 p.m.

To assure full participation at the hearing and during the public comment period, accommodations for effective communication such as a sign language interpreter, printed materials in alternative formats or a language interpreter for non-English speaking participants must be requested at least five (5) working days prior to the date of the scheduled event by contacting the UTA Hearing Officer at 801-244-3271. Requests for ADA accommodations should be directed to UTA's ADA Compliance Officer at 801-262-5626 or dial 711 to make a relay call for deaf or hearing impaired persons.

- Proposals are as follows:
1. Goals of fare changes at UTA:
 - a. Apply a uniform base fare multipliers to simplify fare structure
 - b. Create a single fare for premium bus services
 - c. Change current discount structures to align with other discount levels
 - d. Eliminate some fare products for simplification
 2. Key Terms
 - a. Base fare is not changing = \$2.50. Base fare is what is charged for base adult one-way fare.
 - b. Premium Bus Services = Express Bus, Ski Bus, and Park City Express
 - i. Premium Services are two times base fare = \$5.00 (or 2 X \$2.50)
 - c. Monthly and Day Pass Fares:
 - i. Regular Monthly Fare (Bus & TRAX) = \$2.50 x 34
 - ii. Premium Monthly Fare (Bus, TRAX, & FrontRunner) = \$5.00 X 34
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 - a. Pass changes:
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1294969 **UPAXLP**
Product Salt Lake Tribune **Placement** Legal Liner Notice

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RE: Proposed Fare Changes. The Utah Transit Authority (UTA) is proposing several changes to the fare policy and structure. The goals of the proposed changes are to streamline and simplify fare options and payment, including incorporating consistent multipliers on the base fare to determine daily, monthly, and premium service fares. Proposed changes also include implementing consistent discount rates and eliminating several fare products to simplify options. A 30-day public comment period will occur July 22 through August 21 and one virtual public hearing will be held to gather feedback.

Public Comments:

Relevant information about the proposed changes will be available at the Public Hearing and on the UTA Website at www.rideuta.com/farechanges. The proposed fares changes will be available for public review and comment from **July 22, 2020 – August 21, 2020**. Comments must be received, postmarked or electronically submitted to UTA through one of the following methods by **5 p.m. on August 21, 2020** to be considered as part of the public comment record.

- **Email:** hearingofficer@rideuta.com
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 - c. Monthly and Day Pass Fares:
 - i. Regular Monthly Fare (Bus & TRAX) = \$2.50 x 34
 - ii. Premium Monthly Fare (Bus, TRAX, & FrontRunner) = \$5.00 X 34
 - iii. Day Pass Fare = \$2.50 X 2

3. Proposed Changes to Fares

Current Pass Type	New Pass Type	Proposed Fare Change	Current Cost	New Cost	Why?
Express Bus Route	Premium Bus	Decrease in cost	\$5.50	\$5.00	2 X Base Fare (\$2.50)
Ski Bus & Park City Express	Premium Bus	Increase in cost	\$4.50	\$5.00	2 X Base Fare (\$2.50)
Regular Monthly Pass (Bus & TRAX)	Regular Monthly Pass	Increase in cost	\$83.75	\$85.00	34 X Base Fare (\$2.50)
Premium Monthly Pass (Bus, TRAX, & FrontRunner)	Premium Monthly Pass	Decrease in cost	\$198	\$170	34 X Premium Fare (\$5.00)
Round Trip	Day Pass	Decrease in cost	\$6.25	\$5.00	2 X Base Fare (\$2.50)

4. Proposed Changes to Discounts

Pass Type	Current Discount	New Discount	Proposed Fare Change	Why?
Youth	25% on regular monthly passes = \$62.75	50% off Example: Regular bus fare = \$1.25	Decrease cost, more savings	Align with senior/reduced discounts
Horizon Cardholder Pass	25% on regular monthly passes = \$62.75	50% off Example: Regular monthly pass = \$42.50	Decrease cost, more savings	Align with senior/reduced discounts
FAREPAY Card	40% off regular Bus fare = \$1.50 one-way	20% off regular Bus fare = \$2.00 one-way	Increase in cost	Align discount with other modes

5. Proposed Fare Product Elimination

Eliminated Fare Type	Replacement Option(s)
Premium monthly upgrade pass	Monthly Premium Pass
Tokens, including 10- and 50-packs	Monthly Pass, FAREPAY Card, Cash, Mobile App, One-way ticket
Park City 30-day pass	FAREPAY Card, Cash
Flex Route Deviations Punch Pass	Cash
Monthly passes sold on Ticket Vending Machines (TVMs)	Monthly passes sold at Customer Service outlets, online, or through mobile app

Appendix 3 – News Media Coverage

[UTA proposes fare changes, seeks public comment](#)

<https://www.msn.com/en-us/news/money/uta-proposes...>

Jul 22, 2020 · It **proposes** to decrease a 40% discount on **bus fare** for those who use electronic FAREPAY cards (\$1.50 a ride to a 20% discount (\$2 a ride). It **proposes** boosting a 25% discount on monthly passes for...

[UTA proposes fare changes, seeks public comment - The Salt ...](#)

<https://www.sltrib.com/news/politics/2020/07/22/uta-proposes-fare-changes>

Jul 22, 2020 · It **proposes** to decrease a 40% discount on **bus fare** for those who use electronic FAREPAY cards (\$1.50 a ride to a 20% discount (\$2 a ride). It **proposes** boosting a 25% discount on monthly passes for...

[UTA set to restore many transit services, seeks changes to ...](#)

<https://www.ksl.com/article/50003935/uta-set-to...>

Aug 07, 2020 · Morton explained that the **changes** were envisioned before COVID-19 and because UTA wanted to create a **fare** structure that was simple, seamless, efficient and sustainable. The regular bus fare ...

[UTA changing fares shortly after service ramps back up ...](#)

<https://www.standard.net/news/uta-changing-fares...>

Aug 03, 2020 · Riders enter and exit a train at the Ogden FrontRunner station on Monday, Aug. 3, 2020. UTA is **considering changes to its fare policy**, with the **cost of some services potentially increasing** ...

[Give Your Feedback on Fares Changes](#)

<https://www.rideuta.com/news/2020/08/Give-Your-Feedback-on-Fares-Changes>

Aug 03, 2020 · The proposed changes reflect these goals. The proposed fare structure changes at UTA include: **Applying uniform base fare multipliers to simplify how fares are determined**; **Creating a single fare for premium bus services**; **Changing current discount structures to align with other discount levels**; **Eliminating some fare products for simplification**; **Key Terms. Base Fare**; Base ...

[AM News Brief: UTA Fare Change, Police Union On Reform ...](#)

<https://www.kuer.org/post/am-news-brief-uta-fare...>

Aug 12, 2020 · **Waters spoke at a press conference Tuesday** announcing proposed fare changes. UTA hopes to simplify its cost structure, which will result in some tickets costing more and some costing less. The public comment period runs until Aug. 21. — Elaine Clark

[UTA proposes 3 years of fare increases | KSL.com](#)

<https://www.ksl.com/article/14217368>

SALT LAKE CITY -- The Utah Transit Authority has proposed a gradual increase for bus and transit fares, to keep pace with inflation over the next three years. The change, which UTA is calling...

[PDF]

[WRITTEN COMMENT ON PROPOSED CHANGES IN UTA ...](#)

disabilitylawcenter.org/wp-content/uploads/publications/UTA_public_comment.pdf

Utah Transit Authority (UTA) is a provider of bus, rail, Paratransit and other public transportation services along the Wasatch front. UTA is proposing a three-year fare schedule which includes increases to its current fares and establishes the fare structure for FrontRunner commuter rail, scheduled to open in 2008. About the Fare Proposal

[UTA proposes 3 years of fare increases | KSL.com](#)

<https://www.ksl.com/article/14217368>

The change, which UTA is calling "modest," would take place each spring for three years -- making what is now a \$2 bus or TRAX fare a \$2.50 adult regular ticket by 2013. UTA fares would be among ...

[UTA proposes fare changes, seeks public comment ...](#)

[https://www.newslocker.com/en-us/sport/utah-jazz/...](https://www.newslocker.com/en-us/sport/utah-jazz/)

The Utah Transit Authority is seeking public comment on tweaks that it is proposing to its bus and train fare structure. It is proposing to keep its base fare of \$2.50 per ride the same, but seeks several changes to discounts, passes and charges for premium and express services in what it calls a simplification of its fare structure. Changes would increase some prices and decrease others. For ...

[Proposed Fares Changes Public Hearing - YouTube](#)

<https://www.youtube.com/watch?v=nLEUh7MdfWo>

Aug 11, 2020 · UTA staff, including Fares Director Monica Morton, detail proposed fare changes and take public comments and questions. You can submit an ...

[Comments: UTA proposes fare changes, seeks public comment ...](#)

[https://www.sltrib.com/news/politics/2020/07/22/...](https://www.sltrib.com/news/politics/2020/07/22/)

Comments for UTA proposes fare changes, ... (Utah Transit Authority | Courtesy photo) This 2014 file photo shows a UTA fare enforcement surge. UTA proposes fare changes, seeks public comment ...

Appendix 4 - Supporting Information



New Proposed Public Fare Tables

Local Bus Service & Trax	Current Fare	Effective 11/1/2020
Adult Cash One-Way	\$2.50	\$2.50
Senior Cash One-Way	\$1.25	\$1.25
Reduce Fare Cash One-Way	\$1.25	\$1.25
Adult Monthly Pass	\$83.75	\$85.00
Senior Monthly Pass	\$41.75	\$42.50
Reduced Fare Monthly Sticker	\$41.75	\$42.50
Student/Youth Monthly Pass	\$62.75	\$42.50
Day Pass	\$6.25	\$5.00
Round Trip Ticket (TRAX only)	\$5.00	Eliminated
Route Deviation (Flex routes)	\$1.25	\$1.25
Route Deviation 10-Punch Pass (Flex routes)	\$12.50	Eliminated
Tokens at Pass Outlets (including 10- and 50-packs)	Quantity dependent	Eliminated
Premium Express Bus Service and FrontRunner		
Premium Express Bus Cash One-Way	\$5.50	\$5.00
Premium Senior/Reduced Fare Cash One-Way	\$2.75	\$2.50
Premium Student/Youth One-Way	\$5.50	\$2.50
Park City One-Way	\$4.50	\$5.00
FrontRunner Base Fare	\$2.50	\$2.50
<i>Each additional station</i>	\$0.60	\$0.60
FrontRunner Senior/Reduced Base Fare	\$1.25	\$1.25
<i>Each additional station</i>	\$0.30	\$0.30
FrontRunner Youth/Student Base Fare	\$2.50	\$1.25
<i>Each additional station</i>	\$0.60	\$0.30
Premium Monthly Pass	\$198.00	\$170.00
Premium Senior/Reduced Monthly Pass	\$99.00	\$85
Premium Student/Youth Monthly Pass	\$148.50	\$85
Upgrade from Regular to Premium Monthly Pass	\$114.25	Eliminated
Park City 30-Day Pass	\$162.00	Eliminated
FAREPAY		
FAREPAY Local Bus Adult One-Way	\$1.50	\$2.00
FAREPAY TRAX Adult One-Way	\$2.00	\$2.00
FAREPAY Premium Express Bus	\$4.40	\$4.00
FAREPAY FrontRunner Adult One-Way	\$2.00	\$2.00
Paratransit		
Paratransit Cash	\$4.00	\$4.00
Paratransit 10-Punch Pass	\$40.00	\$40.00
Ski Service		
Ski Service Cash	\$4.50	\$5.00
Ski Senior/Reduced Cash	\$2.25	\$2.50
Intra-Canyon Ski Cash	\$0	\$0
Other Fares		
Low Income Discount/Horizon Monthly Pass	\$62.75	\$42.50
Group Pass	\$15.00	\$15.00

Appendix 5 – Supporting Information Continued

CAMBIOS PROPUESTOS A LA TARIFA

	UN SOLO TRAYECTO	MULTIPLICADORES	DESCUENTOS
TARIFA BASE LA TARIFA BASE DE UN SOLO TRAYECTO PARA ADULTO	 \$2.50	Los pases mensuales se usan alrededor de 34 veces al mes \$2.50x34 \$85	Los pases diarios se usan alrededor de 2 veces al día \$2.50x2 \$5
		DESCUENTOS	
			Descuento Horizon 50% \$2.50/2 Pase mensual \$42.50
			Descuento FAREPAY 20% \$2.50 Tarifa de un solo trayecto \$2.00

	UN SOLO TRAYECTO	MULTIPLICADORES	
TARIFA BASE PREMIUM LOS SERVICIOS PREMIUM INCLUYEN EXPRESS BUS, SKI, BUS Y PARK CITY EXPRESS*	 \$5.00	La tarifa Premium es la tarifa base x2 2X\$2.50 \$5.00	Los pases mensuales Premium se utilizan alrededor de 34 veces al mes e incluyen FrontRunner \$5.00x34 \$170

* Los servicios enumerados son los Servicios de Premium Bus.

BUENAS NOTICIAS

- Pase mensual Premium (Bus, Trax, FrontRunner) reducido de \$198 a \$170
- Viaje Redondo reemplazado con Pase Diario, que se reduce de \$6.25 a \$5.00
- Incremento en el descuento para jóvenes de 25% a 50% = Precio reducido del Pase Mensual de \$62.70 a \$42.50
- Incremento en el descuento de la tarjeta Horizon de 25% a 50% = Precio reducido del Pase Mensual de \$62.70 a \$42.50
- Tarifa reducida de \$5.50 a \$5.00 para el Express Bus

PRODUCTOS DE TARIFAS ELIMINADOS

- Pase mejorado mensual Premium
- Todas las ventas de fichas, incluyendo los paquetes de 10 y 50 fichas (Habrán créditos disponibles por las fichas)
- El pase Park City de 30 días
- Pase perforable Flex Route Deviations
- Los pases mensuales vendidos en las máquinas expendedoras de boletos (TVMs)

ENCUENTRE MÁS INFORMACIÓN EN
rideuta.com/farechanges

PROPOSED FARE CHANGES

	SINGLE RIDE	MULTIPLIERS	DISCOUNTS			
BASE FARE THE BASE ADULT ONE-WAY FARE.	 \$2.50	Monthly Passes are used about 34 times a month $\$2.50 \times 34$ \$85	Day Passes are used about twice a day $\$2.50 \times 2$ \$5	Youth Discount 50% \$2.50/2	Horizon Discount 50% \$2.50/2	FAREPAY Discount 20% \$2.50
				One-Way Fare \$1.25 Monthly Pass \$42.50	Monthly Pass \$42.50	One-Way Fare \$2.00

	SINGLE RIDE	MULTIPLIERS	
PREMIUM BUS FARE PREMIUM SERVICES INCLUDE EXPRESS BUS, SKI BUS, AND PARK CITY EXPRESS*	 \$5.00	Premium Fare is 2xBase Fare. $2 \times \$2.50$ \$5.00	Premium Monthly Passes are used about 34 times a month (these include FrontRunner) $\$5.00 \times 34$ \$170

* Services listed are Premium Bus Services

GOOD NEWS

- Premium Monthly Pass (Bus, TRAX, FrontRunner) reduced from \$198 to \$170
- Round Trip replaced with Day Pass, which is reduced from \$6.25 to \$5.00
- Youth discount increased from 25% to 50% = Monthly Pass price reduced from \$62.70 to \$42.50
- Horizon card discount from increased 25% to 50% = Monthly Pass price reduced from \$62.70 to \$42.50
- Express bus fare reduced from \$5.50 to \$5.00

ELIMINATE FARE PRODUCTS

- Premium monthly upgrade pass
- All token sales including 10-pack and 50-pack (credit for tokens will be available)
- Park City 30-Day pass
- Flex Route Deviations Punch Pass
- Monthly passes sold on Ticket Vending Machines (TVMs)

*Fares not listed are not changing

LEARN MORE AT rideuta.com/farechanges

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE TITLE VI FARE EQUITY BRIEFING**

R2021-06-02

June 9, 2021

WHEREAS, the Utah Transit Authority (the “Authority”) is a large 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 Fare Equity Briefing (“Title VI Equity Briefing”) prepared by Authority staff; and

WHEREAS, the Board desires to approve the Title VI Equity Briefing.

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

1. That the Title VI Equity Briefing 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 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 9th day of June 2021.

Carlton Christensen, Chair
Board of Trustees

ATTEST:

Secretary of the Authority

(Corporate Seal)

Approved As To Form:

DocuSigned by:
David Wilkins
5E3267B4CF024B9...

Legal Counsel

Exhibit A
(Title VI Fare Equity Briefing)



Title VI Equity Briefing – Low-Income Pilot

To: UTA Board of Trustees: Carlton Christensen, Beth Holbrook, Jeff Acerson

From: Andrew Gray

RE: Title VI Equity Briefing - Low-Income Pilot

Introduction

In consultation with and the direction of the Federal Transit Administration's Civil Rights Regional Compliance Officer, the Utah Transit Authority (UTA) Office of Civil Rights has prepared an equity briefing. This briefing is designed to document the review of proposed fare changes that do not rise to the level of a system-wide impact like a change to the base fare, but still rise to a level that could cause Title VI equity issues upon their implementation. In consideration of the potential impact, UTA shall document the efforts made to ensure that Title VI considerations were taken into account and that there are no foreseeable negative impacts on minority and/or low-income populations. The equity briefing is not documented to the extent of other major changes due to the limited nature of the proposed change.

Background

UTA's Office of Civil Rights has reviewed a proposal to make permanent a pilot program that offers a free fare to a large number of low-income individuals by partnering with human services providers ("service providers") within the service area. Prior to this pilot, UTA had established partnerships with providers of homeless services within the service area to provide a 50% discount on pass sales. These passes were sold directly to homeless service providers who were then required to provide these passes to participants in their programs that were experiencing homelessness free of charge.

In 2020, UTA expanded the availability of discounted passes to include all non-profit and governmental entities that serve low-income individuals within the service area and increased the discount to 75%. This new structure also broadened the availability of discounted passes to any individual participating in a service provider's program that is at or below 150% of the Federal poverty level. This is the level used to define the program's low-income designation. These passes are sold directly to service providers who are required to provide these passes to participants in their program free of charge. The pilot program started with a select few service providers and subsequently expanded to more than seventy service providers and governmental agencies whose mission aligns with UTA's goal to assist low-income households within the service area.

In order to assess the impacts of this pilot program before it is implemented as a permanent program, UTA compiled the relevant demographics for the proposed fare changes pursuant to the requirements set forth in FTA Circular 4702.1B.

Title VI Policy

UTA's Title VI Policy 1.1.28 outlines the method of measuring disparate impacts on minority populations and disproportionate burdens on 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 a finding of either a disparate impact or disproportionate burden. Disparate impact is a finding when examining impacts borne by minority



populations while disproportionate burden is a finding regarding low-income populations. A negative impact of 5% or greater is determined by comparing the impacted population to the system or surveyed average. The impacted population is defined as the people that have access to the fare program that is being changed. The impacted population is compared to the entire surveyed population to determine the equity of the proposal. If either a disproportionate burden or disparate impact is found, UTA must take steps to avoid, minimize, or mitigate impacts where practicable as well as demonstrate compliance with the prescribed steps outlined by the FTA. The demographics of the entire weighted survey is shown in the table below.

Minority:	
Population:	145,069
Minority Population:	39,384
Percent Minority:	27.1%

Low-Income:	
Population:	124,048
Low-Income Population:	50,035
Percent Low-income:	40.3%

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

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

Datasets Used

UTA has utilized rider surveys conducted in 2018 and 2019 to determine the demographics of the people impacted by the proposed changes. The demographics data is determined based on the responses to survey questions regarding fare media usage, race, income level, and household size. UTA utilizes the responses to questions such as race, ethnicity, and income levels in order to review and determine potential impact of the proposed changes to ensure that the changes don't disproportionately negatively impact minorities and/or low-income individuals. As a note, any differences in the totals between minority and low-income is due to the survey taker's ability to decide whether or not to answer specific questions while answering others.



Breakdown of Impacted Population

When evaluating fare changes, UTA will typically review the demographics of the riders that use the fare type that is being changed. In this instance, however, data is not available for the population directly accessing this service. UTA does have ridership data that can be useful in evaluating the potential demographics of those utilizing human services to obtain free passes. The most recent onboard survey asked how the respondent obtained their pass and included “Human Service Agency” as one of the available responses. Below is a table of the weighted respondents’ demographics. “Overall percentage” is the percent of respondents that were minority or low income in the entirety of the survey. “Human Services Percentage” is the percent respondents that were minority or low income that received passes from a human service agency.

Riders utilizing Human Service Agencies:

Minority:	
Overall Percentage:	27.1%
Human Services Percentage:	35.6%
Difference:	8.5%

Low-Income:	
Overall Percentage:	40.3%
Human Services Percentage:	38.9%
Difference:	-1.4%

In addition to the data of those utilizing human service agencies to obtain free passes, UTA also had overall data on the low-income data of minority and non-minority riders from the most recent onboard survey. Of all respondents indicating that they were low income, 31.3% of them identified as a minority, which is 4.2% greater than the overall minority percentage. Additionally, when the percentage of minorities and non-minorities that are low-income is considered, there is a sizeable disparity between the two. While 37.5% of non-minority respondents indicated that they were low-income, minority respondents indicated that 48.6% of them were below 150% the federal poverty rate.

Findings

Based on the data collected on a system-wide level, UTA does not find any disproportionate burdens borne by low-income populations or any disparate impacts on minority populations. The program requirements and contract signed with service providers specifically stipulates that recipients of the passes must be at or below 150% the federal poverty level. Due to this, UTA anticipates that 100% of participants will be low-income.

The rider survey data presented regarding the recipients of free passes obtained from human services show that minorities accessed these programs at a greater rate than the general ridership’s demographics would have indicated. Additionally, when the demographics of low-income riders are considered, minority populations have a much higher percentage (11.1%) of low-income than their non-minority counterparts.

Conclusion

The proposal to adopt the pilot program to make discounted fare products available to service providers and governmental agencies does not appear to pose any potential for a Title VI finding due to the overwhelming benefit that it will have to low-income populations. Not only is there not a potential for any disparity, but data indicates that minority populations are overrepresented in the low-income populace and among the people utilizing human services. This greater rate of minorities in the impacted group likely indicates a net benefit for minority populations.

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH TRANSIT
AUTHORITY APPROVING THE AUGUST 2021 CHANGE DAY TITLE VI
SERVICE EQUITY ANALYSIS**

R2021-07-05

July 28, 2021

WHEREAS, the Utah Transit Authority (the "Authority") is a large 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 August 2021 Change Day Title VI Service 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 2021 Change Day Title VI Service 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 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 28th day of July 2021.

DocuSigned by:



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Carlton Christensen, Chair
Board of Trustees

ATTEST:

DocuSigned by:



8D8A6B67F3AA459
Secretary of the Authority



(Corporate Seal)

Approved As To Form:

DocuSigned by:



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Legal Counsel

Exhibit A

August 2021 Change Day Title VI Service Equity Analysis



Title VI Service Equity Analysis

August 2021

Utah Transit Authority

Contents

Introduction	3
Summary of Proposed Changes	3
Summary of Findings.....	3
UTA Policy and Definitions.....	4
Definitions	4
Major Service Change	5
Evaluation and Analysis of Service and Fare Changes	6
Disparate Impact and Disproportionate Burden	6
Finding a Disparate Impact	6
Finding a Disproportionate Burden	7
Proposed Changes.....	8
Routes Replaced by Microtransit.....	8
Other Major Changes.....	10
Analysis of Proposed Changes	13
Analysis of Potential Impacts on Minority Populations	14
Analysis of Potential Impacts on Low-income Populations	18
System-Wide Impacts	22
Conclusion.....	22
Appendix A – August 2021 Change Day Public Comment Report	23

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 2021. 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 potentially 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

UTA has proposed 13 major changes during the August Change Day. Nine routes are proposed to be discontinued and four new routes added to the system. Six of the routes being discontinued are routes in an area where on-demand service has been introduced. The other three routes being discontinued are being replaced by four new flex routes using smaller vehicles capable of deviating from fixed routing to provide pick-up points other than designated stops.

Summary of Findings

The August 2021 Change Day proposal includes the discontinuation of many routes and the replacement of others in order to provide the most efficient community specific service possible. The routes being discontinued serving Title VI populations have proposed replacements with the same if not better services than the existing ones including flex routes and demand response service. When looking at the system-wide impact of the proposed changes, and accounting for the proposed new routes, the demographics of those under the proposed service are larger and more diverse than those in the previous service levels. A review of the route and system level changes do not result in any findings of a potential disparate impact on minorities or disproportionate burden borne by low-income households.

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 publications 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. *"Flex Route"* refers to a route that, upon request, can deviate from its fixed route to provide a curbside pick-up or drop-off of up to $\frac{3}{4}$ of a mile around the fixed route. Deviations from the fixed route cost an additional \$1.25.
- 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 2012-2016 5-year population estimates provided by the American Community Survey (ACS).

<i>Low-Income System Average:</i>	
Population:	2,351,065
Low-Income Population:	404,688
Percent Low-income:	17.2%

<i>Minority System Average:</i>	
Population:	2,368,702
Minority Population:	546,507
Percent Minority:	22.9%

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 service 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 Replaced by Microtransit

Beginning in November 2019, UTA began a microtransit pilot service partnering with Via, a leader in on demand shared rides, in southern Salt Lake County. The pilot program has been successful and will be permanently adopted during this August change day period. Of note is the FTA's guidance found in FTA Circular 4702.1B which states that the circular's requirements do not apply to demand response services and Title VI equity analyses.



As such, the inclusion of this information is to provide additional context and justification regarding the cancellation of routes within the microtransit service area.

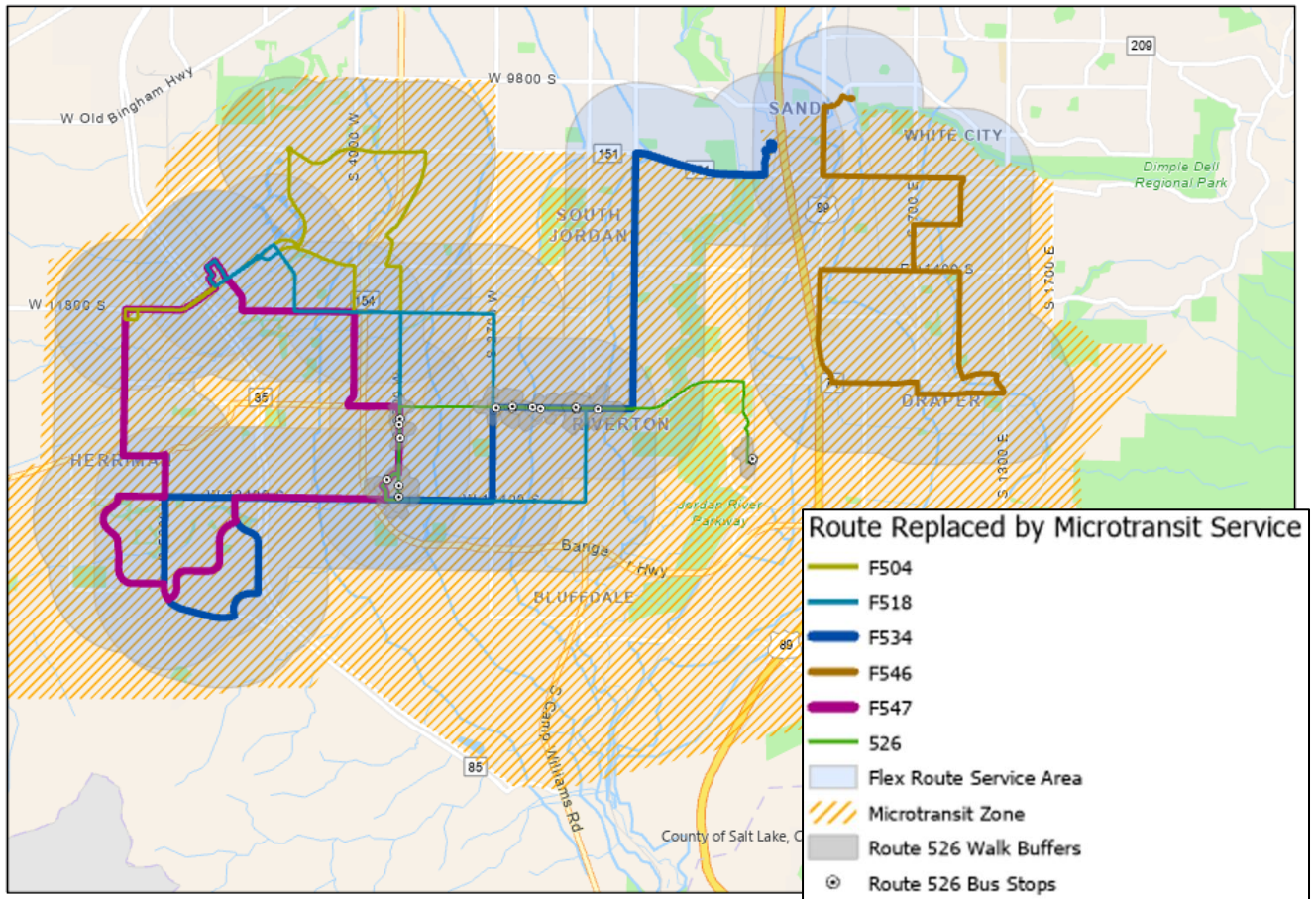
Microtransit is an innovative form of on demand transportation that connects riders with other transit services as well as to other local destinations within the community. Via's technology matches multiple riders headed in a similar direction into a single vehicle; and creates routes that allow for quick and efficient shared trips without lengthy detours or relying on fixed route schedules.

The UTA On Demand by Via services about 65 square miles in the cities of Bluffdale, Draper, Herriman, Riverton and South Jordan. The service area includes seven TRAX and FrontRunner stations and provides much more effective first-and-last mile connections to our bus and rail services. A rider's trip must start and end within the designated service area. After booking a ride, the app will display the pick-up location where the vehicle meets the rider. Via is a corner-to-corner service, so riders are picked up and dropped off at their final destination if it within the service area or at any of the transit stops or stations within the service area.

This area of Salt Lake County does not have high ridership on fixed routes. As a result, UTA is proposing to cancel most of the existing fixed and flex routes that are in this area and relying on the microtransit service as a replacement. In order to keep service accessible, UTA has acquired accessible vehicles that are used in the service area and created alternative methods for scheduling the service rather than just the use of a smart phone. Riders can call in to customer service and schedule a ride without the use of the app.

With the full adoption of microtransit, UTA has determined that the following routes are being discontinued due to low relative ridership and the permanent introduction of a viable alternative in microtransit. The routes being discontinued are routes F504, F518, 526, F534, F546, and F547. Of these routes, the 526 and F534 were both discontinued during COVID as part of UTA’s response to decreased ridership. We are proposing to eliminate the routes and not have them return to service.

Below is a map showing the existing routes that would be removed with the proposed changes. The map has half mile buffers around the flex routes to show the area to which they can deviate, quarter mile buffers around each stop on fixed route, and a shaded area showing the on demand microtransit service area.

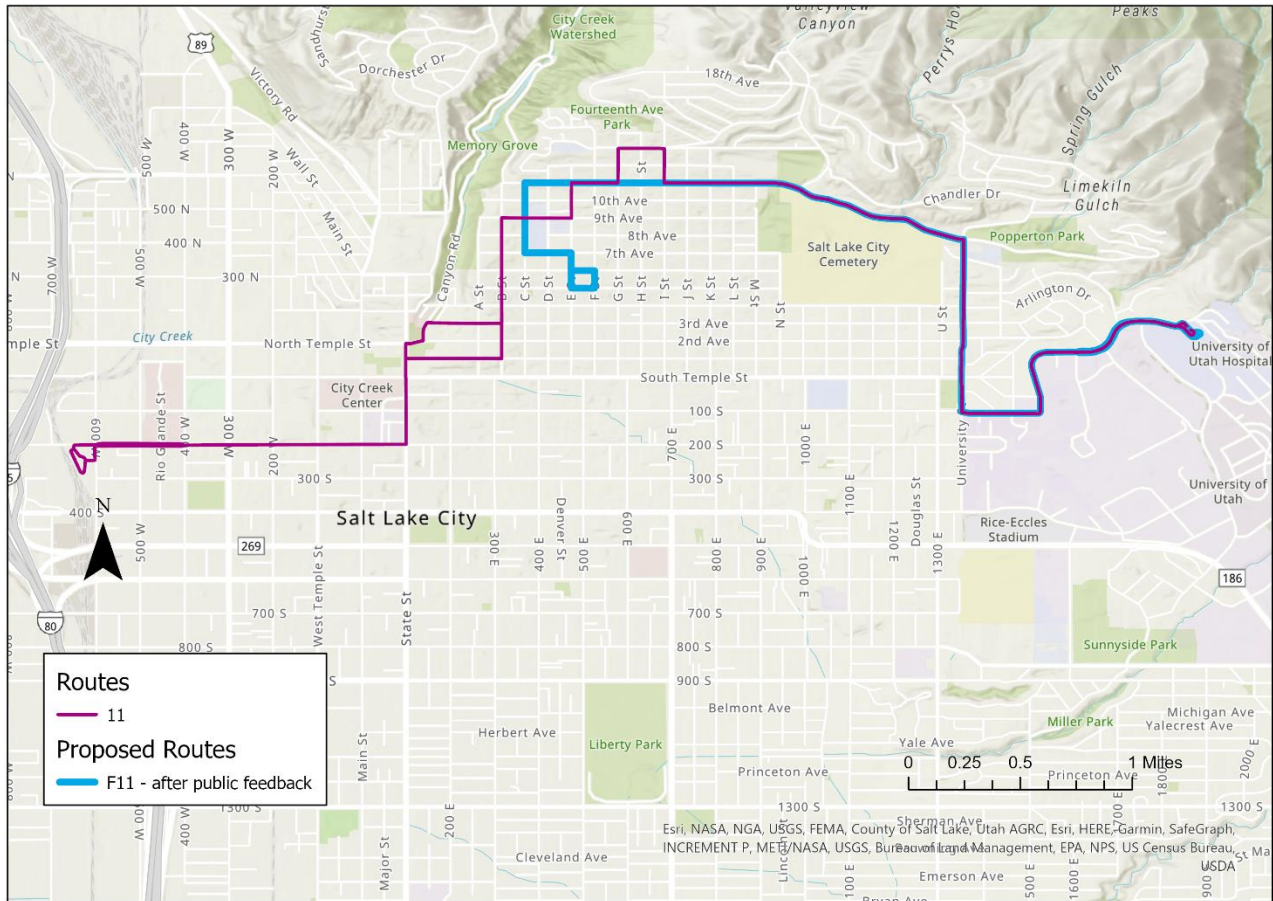


Other Major Changes

Routes 11 & F11

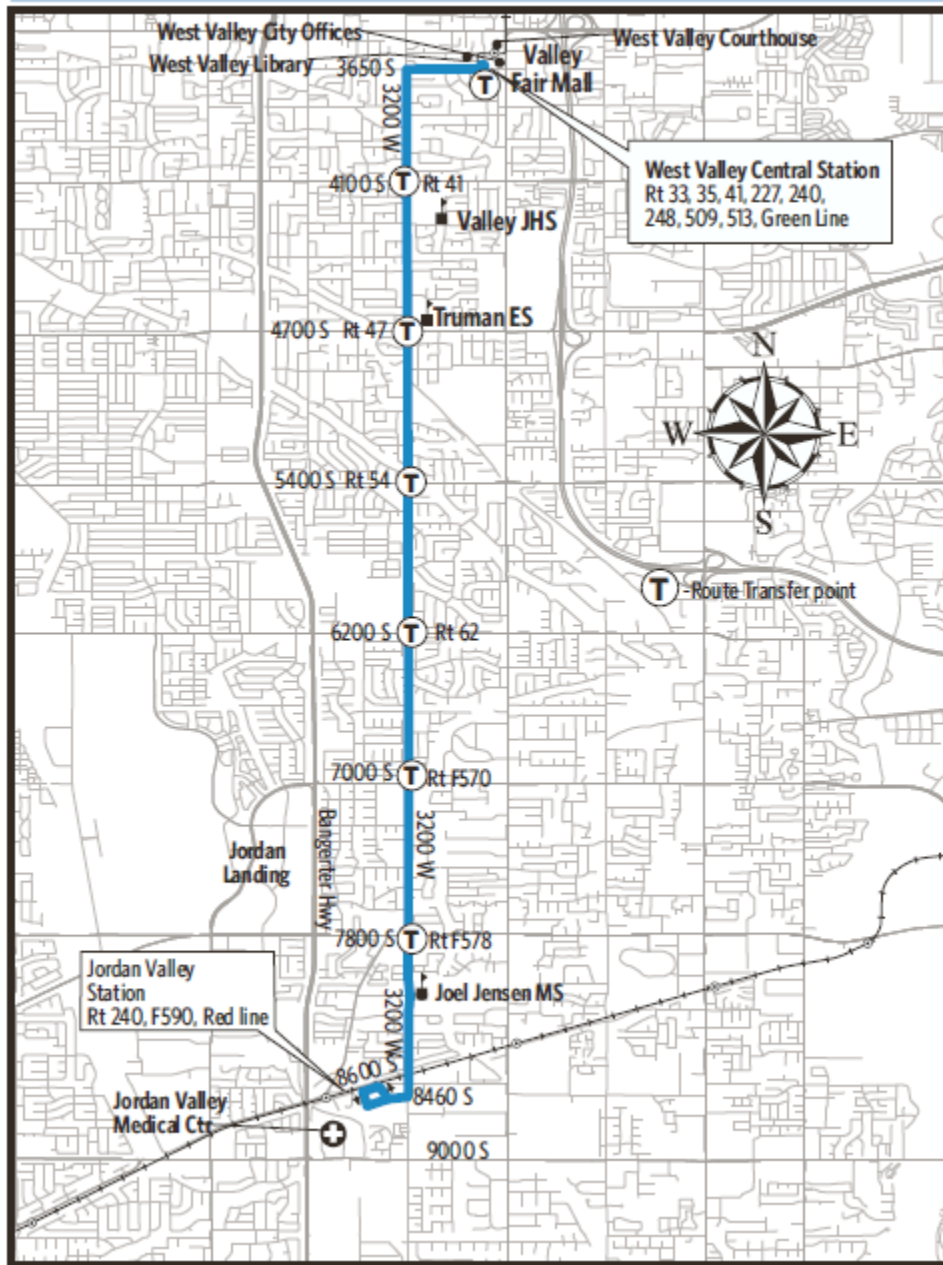
It is proposed to discontinue route 11 as a regular fixed route and replace large portions of it with the new route F11. This will transition it to a service that will be able to deviate from the fixed route and pick riders up within a half mile radius of the route. It will also replace the 40 foot bus with a smaller vehicle. Route 11 has substantial duplication in alignment with route 6 which accounts for the portions of the route not being directly replaced by the F11's addition. See below for images of the current and proposed alignment. There are no proposed changes to frequency with a slight increase in span of service.

During UTA's public comment period feedback was received that the original proposal's alignment was not going to meet the needs of riders. The original alignment did not go up to the University of Utah Hospital, but rather made a loop before going up the University's campus. Based on this feedback, UTA revised the alignment to include trips to the hospital.



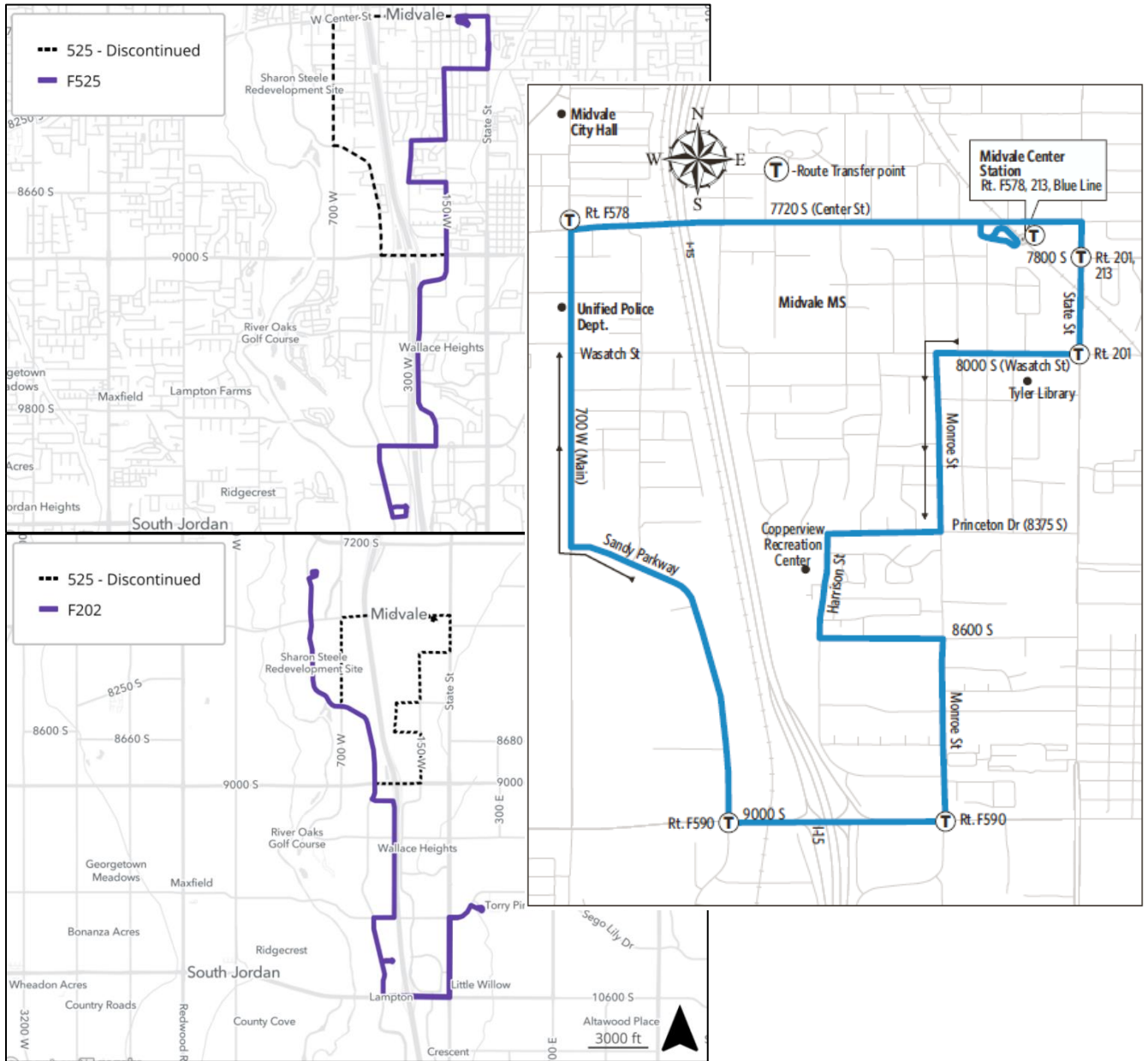
Routes 232 & F232

It is proposed to discontinue route 232 and replace its exact alignment with a new flex route. As stated previously, this decreases vehicle size and adds the feature where the transit vehicle is able to deviate from its fixed route and pick up passengers within a half mile radius for an additional \$1.25 charge. Other than these changes, there are no other proposed changes to frequency or span of service.



Routes 525, F202, and F525

Route 525 is an existing route that is a one way circular route in the Midvale area. The current nature of the route can be inconvenient for people whose stops are more easily accessed counterclockwise and requires them to ride all the way around. It is proposed to discontinue this route and replace it with F202 and F525. They do not follow the alignment exactly, but they provide better connections to other routes and rail than the current alignment. The sections of the 525 not included in the two direct replacements are actively serviced by the F578 and other routes. The new routes will have the same frequency and a slight increase to span of service, but there are no proposed decreases. Due to the non-circular routing there is a net increase.



Analysis of Proposed Changes

UTA has analyzed the potential impacts of any major service change as it relates to low-income and minority populations, and evaluated the potential for adverse impact on these groups. To this end, UTA has created the maps, tables and related data found in this section. The data in this section was compiled utilizing American Community Survey (ACS) 2018 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups 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, flex route radii, and stations serviced by the impacted route. Some stop locations are approximate and may be in a different location once land is acquired or permissions are granted for land use. All bus stop locations have had a one quarter mile walkability radius applied to them, which was based on the actual accessibility of the stop or station by road. Flex routes have a half mile radius attached to the alignment due to the deviation capabilities of that service type. Any census block that was overlapped by any of these radii had 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.

Total low-income population was calculated using ACS household income data which excludes certain housing types where a “household” does not reflect those within the living quarters (e.g. prisons, college dormitories, etc.). For this reason, the total minority population and the total low-income population differed at varying degrees contingent upon the number of this household type within the impacted area.

The maps in this section show the route, individual stops, flex route radii and census blocks with concentrations of low-income households or minority individuals above the system average shaded.

Analysis of Potential Impacts on Minority Populations

This section examines the populous being served by current service on the routes being impacted by the proposals. The tables below depict the proportion of minorities on routes that would be impacted by the proposed changes. These are reviewed individually to ensure that individual routes are not causing any disparate impacts.

Minority Demographics of Discontinued Routes

Route	Total Population	Minority Population	Minority Percent	Difference From System Average
11	18,825	3,835	20.4%	-2.5%
232	31,832	11,284	35.4%	12.5%
525	15,220	7,069	46.4%	23.5%
526	6,363	677	10.6%	-12.3%
F504	48,031	7,255	15.1%	-7.8%
F518	65,306	8,540	13.1%	-9.8%
F534	75,015	9,063	12.1%	-10.8%
F546	48,619	7,700	15.8%	-7.1%
F547	67,569	9,969	14.8%	-8.1%

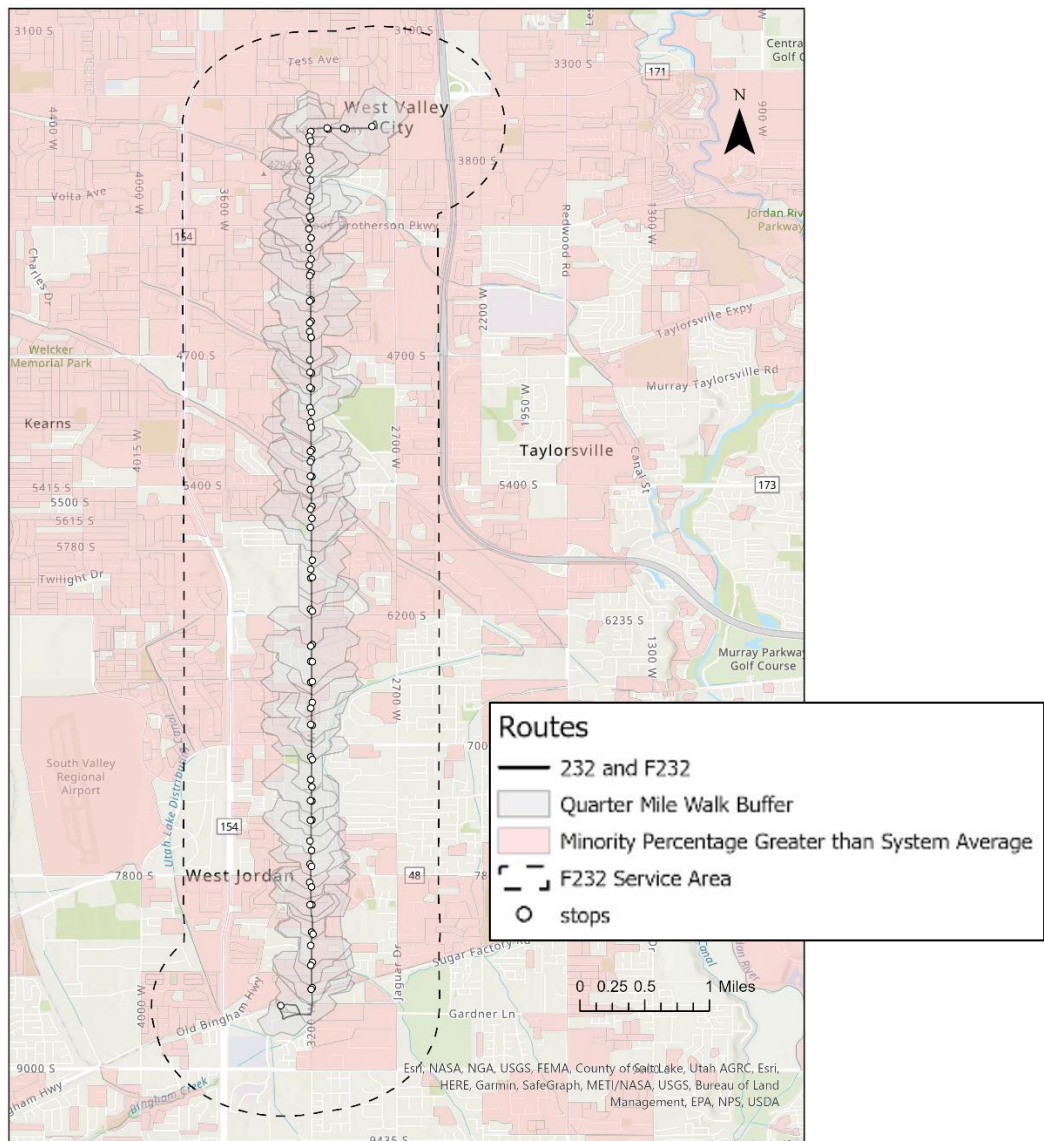
Minority Demographics of New Routes

Route	Total Population	Minority Population	Minority Percent	Difference From System Average
F11	35,936	7,154	19.9%	-3%
F202	32,595	10,445	32.0%	9.1%
F232	85,311	33,372	39.1%	16.2%
F525	35,474	11,199	31.6%	8.7%

In reviewing the data presented, UTA identified the potential for a disparate impact on routes 232 and 525 in accordance with UTA's disparate impact policy. The impacted populace has a percentage of minorities living within its bounds showing the potential of a negative impact in excess of 5% greater than of the system average. Other than these two items, however, there does not appear to be any potential for *negative* impacts in excess of this threshold. There are other items that are greater than 5% but these would either negatively impact groups that have lower minority populations or would positively impact groups that have higher minority populations which would not be seen as a potential for disparate impact.

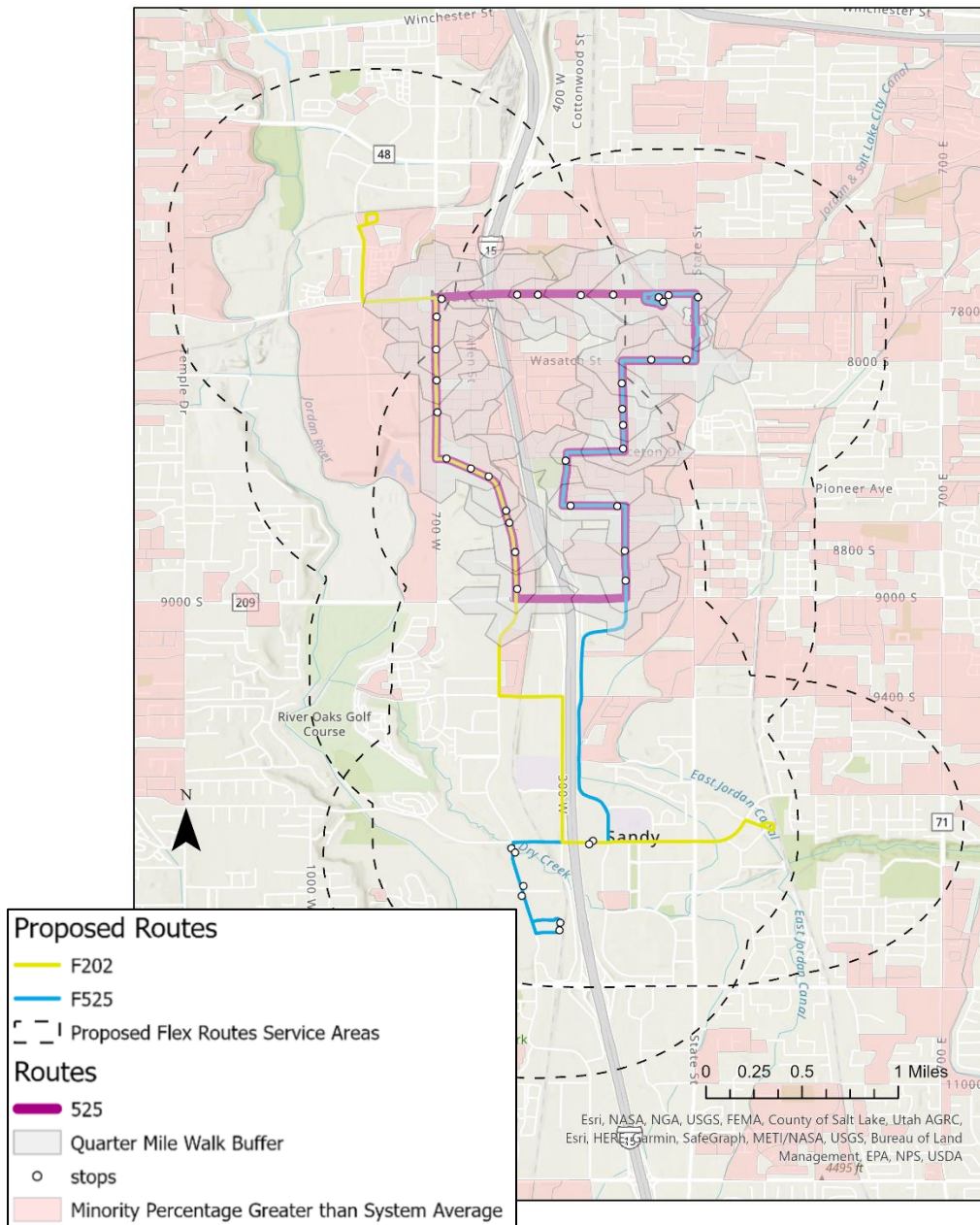
Route 232

Route 232 is immediately being replaced by the F232 with the exact same route which immediately negates any potential negative impacts. Considering that a regular fixed route is being replaced by a flex route, there is a difference in the number of people that fall into the impacted population since UTA defines the parameters differently on these two service types. Fixed route uses a walkability radius of a quarter mile whereas flex routes use a half mile radius of the route itself. This difference is due to the fact that flex routes can deviate from their fixed route to pick people up within that half mile radius. Due to the difference in service type, the new service will actually serve three times as many people identifying as a minority. See map below to show the difference between present and proposed service area.

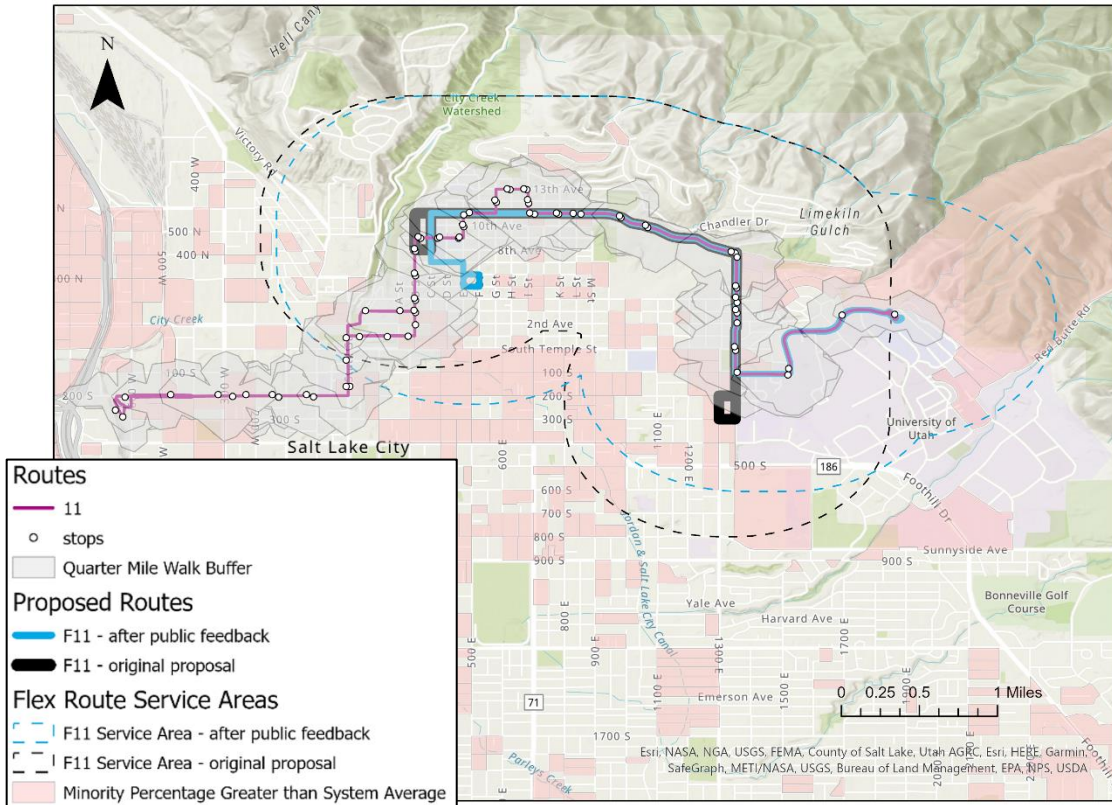


Route 525

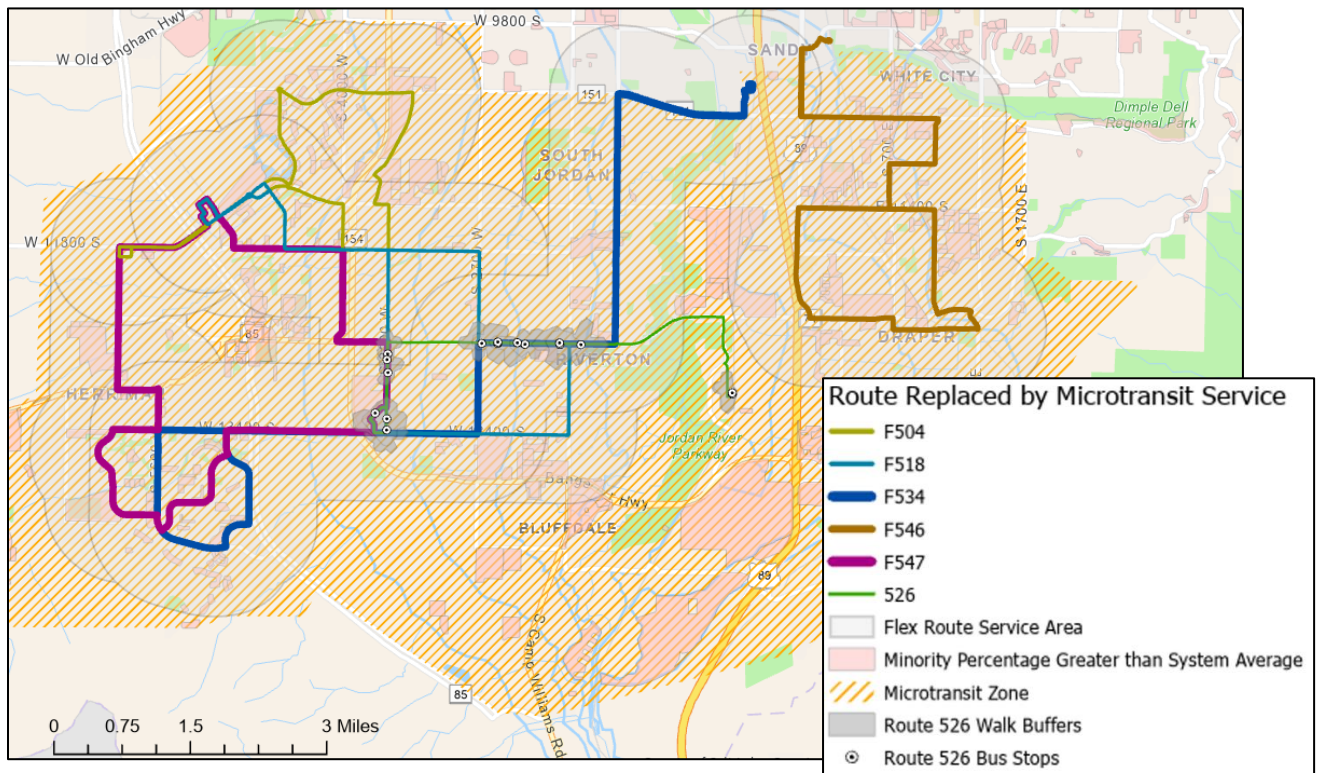
Much like with route 232, the service area and impact of the existing fixed route will be greatly augmented by the addition of flex routes and the addition of more routing will provide additional connections that do not exist with the current 525 alignment. However, based on the data presented, there are concerns that there is a potential disparate impact based on the demographics of those within the impacted areas. As the map below shows, there are five stops that will not be serviced with the new routes. However, due to the expanded service area that a flex route offers and the stops being serviced by F578 these issues are negated.



Routes 11 & F11



MicroTransit & Related Discontinued Routes



Analysis of Potential Impacts on Low-income Populations

This section examines the populace currently served on the routes being impacted by the proposals. The tables below depict the proportion of low-income populations on routes that would be impacted by the proposed changes. These are reviewed individually to ensure that individual routes are not causing any disproportionate burdens.

Low-Income Demographics of Discontinued Routes

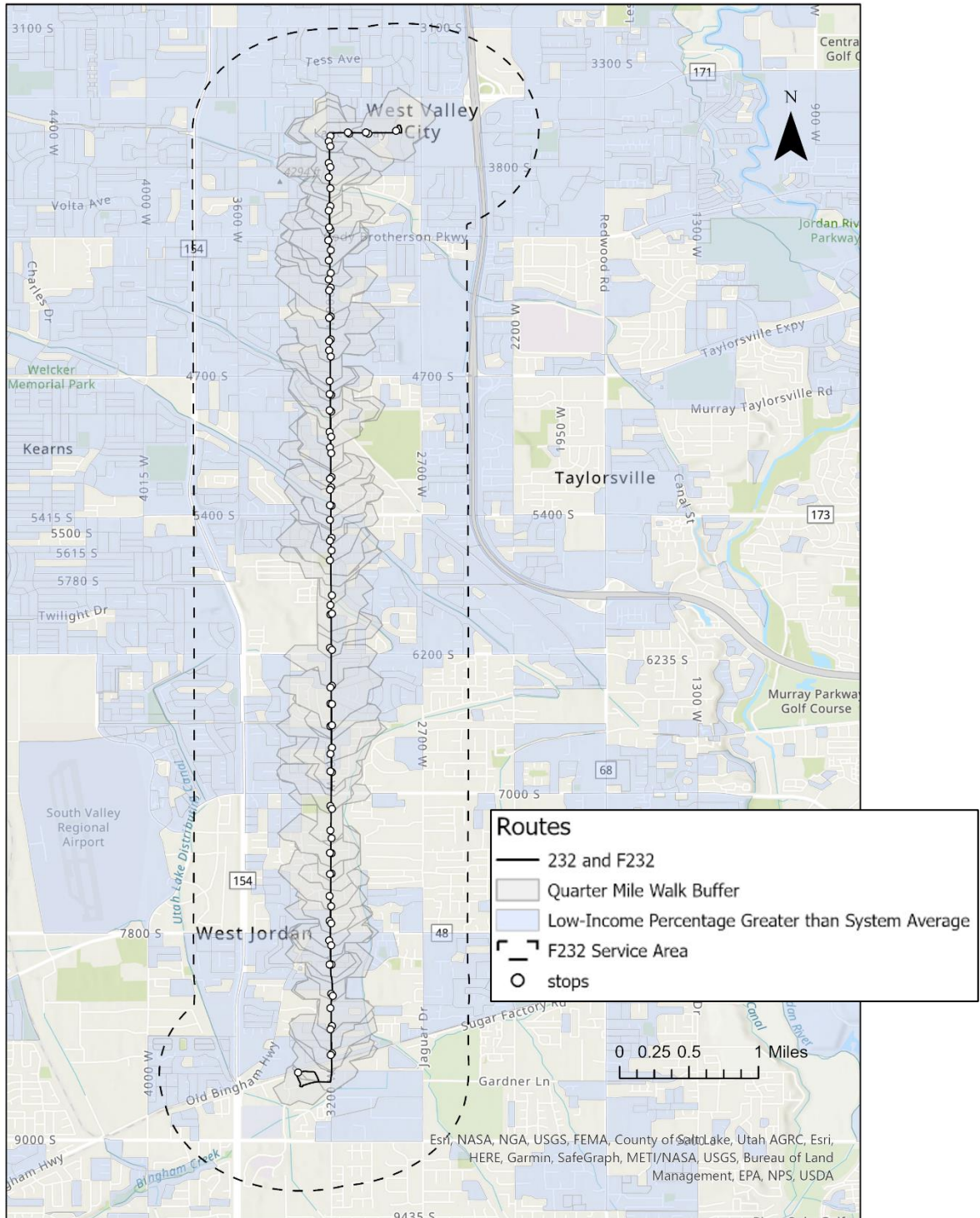
Route	Total Population	Low-Income Population	Low-Income Percent	Difference From System Average
11	18,507	3,787	20.5%	3.3%
232	31,495	4,873	15.5%	-1.7%
525	15,164	4,677	30.8%	13.6%
526	6,354	257	4.1%	-13.1%
F504	47,900	2,553	5.3%	-11.9%
F518	65,139	3,591	5.5%	-11.7%
F534	74,906	3,522	4.7%	-12.5%
F546	48,254	4,158	8.6%	-8.6%
F547	67,498	3,580	5.3%	-11.9%

Low-Income Demographics of New Routes

Route	Total Population	Low-Income Population	Low-Income Percent	Difference From System Average
F11	33,705	8,166	24.2%	7%
F202	32,382	6,869	21.2%	4%
F232	84,611	15,974	18.9%	1.7%
F525	35,284	8,109	23.0%	5.8%

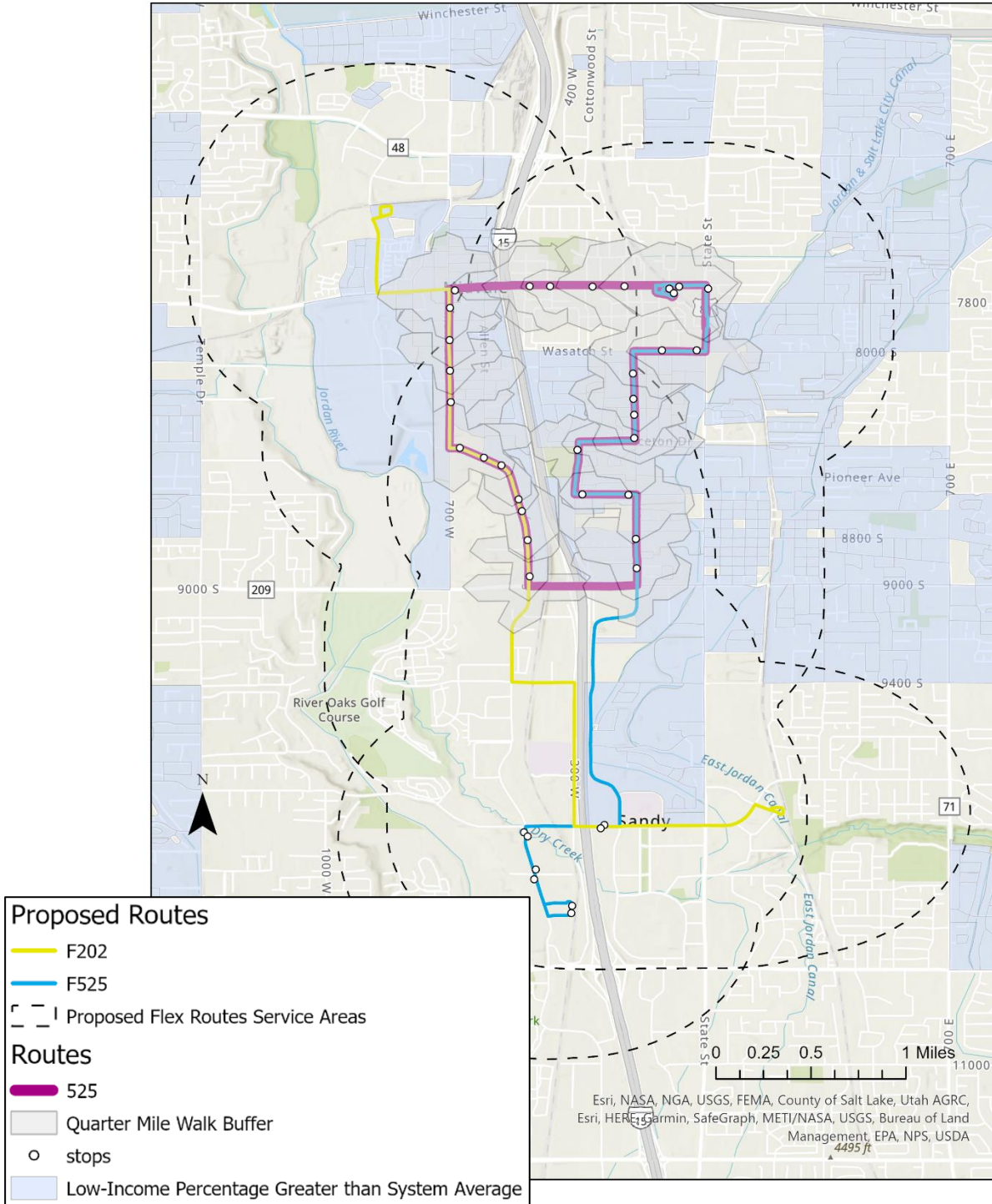
In reviewing the data presented, UTA identified the potential for a disproportionate burden on route 525 in accordance with UTA's disproportionate burden policy. The impacted populace has a percentage of low-income living within its bounds showing the potential of a negative impact in excess of 5% greater than of the system average. Other than this item, however, there does not appear to be any potential for *negative* impacts in excess of this threshold. There are other items that are greater than 5% but these would either negatively impact groups that have lower low-income populations or would positively impact groups that have higher low-income populations which would not be seen as a potential for a disproportionate burden.

Route 232

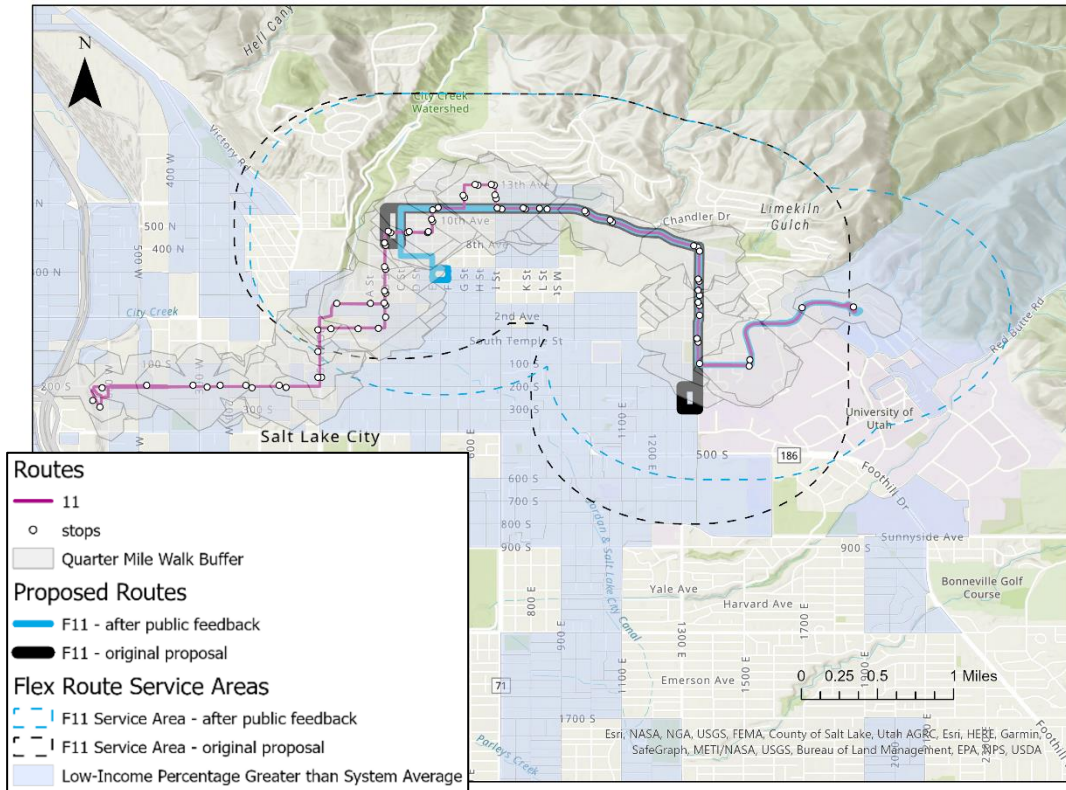


Route 525

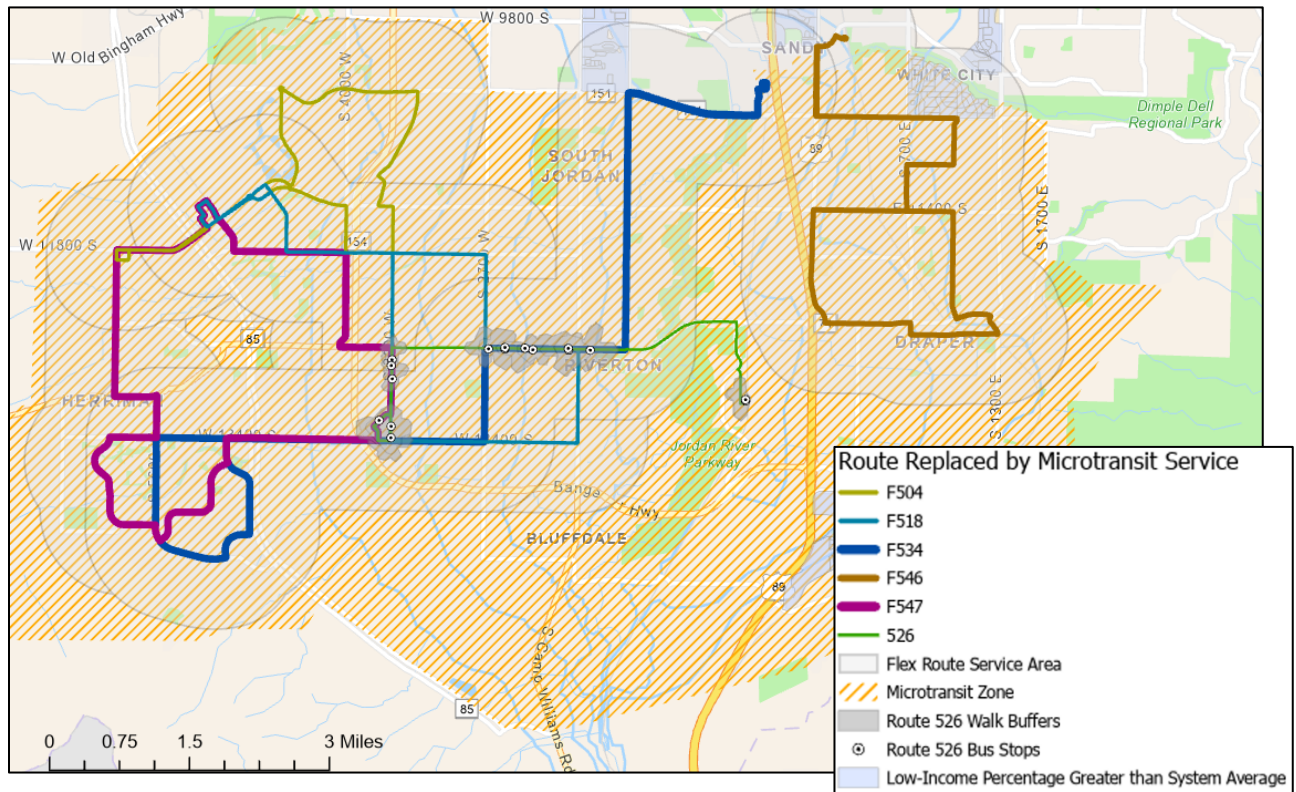
For a full narrative on this change, see the disparate impact portion of this analysis regarding route 525. There were no areas that lost service and the flex routes expanded the service area.



Routes 11 & F11



MicroTransit & Related Discontinuations



System-Wide Impacts

UTA has stated in policy that it would measure the impacts of all major service changes cumulatively when there is more than one proposed major change for a service period change. In order to accomplish this, UTA took an aggregated total of all of the census blocks that fell within a quarter mile of all of the stops and a quarter mile around the flex routes that had proposed changes. In order to measure impact, the figures presented are separated into populations as they currently stand and as they would be if all of the proposed changes were finalized. Special considerations were made to ensure that any census blocks overlapped by multiple routes were not counted twice. Below is a before and after breakdown using these parameters. Please note, the service area for the microtransit on-demand service has been included in the proposed figures. This is included since it is acting to replace the service being removed and provides a more comprehensive view of the proposed changes' impact.

Change in System-Wide Minority Geographic Access to Transit Service

	Total Population	Minority Population	Minority Percent
Pre-August Change	245,051	47,545	19.4%
August 2021 Proposal	400,723	92,002	23.0%
Difference	155,672	44,457	3.6%

Change in System-Wide Low-income Geographic Access to Transit Service

	Total Population	Low-income Population	Low-income Percent
Pre-August Change	243,727	24,580	10.1%
August 2021 Proposal	394,340	52,457	13.3%
Difference	150,613	27,877	3.2%

The data before and after the changes shows that the number of people being served in the impacted areas has increased over 60%. The number of low-income people and the minority population has proportionally increased over 3% in each category. Overall, the benefits of the changes far outweigh any potential negative impacts on a system-wide level.

Conclusion

Although there were some changes that had a potential route level adverse impact on low-income and minority populations, UTA has concluded that all of the changes were mitigated by the immediate implementation of new routes. Therefore, UTA finds that there were no findings of disproportionate burden or disparate impact.

Appendix A – August 2021 Change Day Public Comment Report

August 2021 Change Day – Proposed Service Changes

Public Involvement Report

Updated 07.02.2021

Introduction

In April 2021, the Utah Transit Authority (UTA) proposed several major changes to transit service for implementation on August Change Day (August 8). Those proposed major changes can be reviewed in Appendix 1 of this report. The agency held a 30-day public comment period from April 28 through May 28 with multiple opportunities for the public to engage in the input process, including a virtual public hearing on May 12. This report details public involvement and feedback on the proposed changes.

Part 1: Public Engagement Efforts

Engagement Overview

Component	Dates	Additional Detail
Public comment period	April 28 – May 28	30-day period was required. Public notice was published. Comment was accepted via email, mail, online form, phone, and in-person at Customer Service locations.
Public hearing (Virtual)	May 12, 6pm	15 days after public comment period announced, this public hearing was held virtually over Zoom. UTA staff presented information about proposed changes and answered questions. Registered participants were invited to provide public comment during the meeting. A recording was made available following the event.
Customer Service Information	April 28 – May 28	Customer service offices across the service area (4 locations) supported information sharing about proposed changes onsite for members of the public to learn more and provide comment.
Virtual engagement	April 28 – May 28	Available throughout the comment period online, included virtually accessible information and feedback opportunities through OpenUTA. (Rideuta.com/AugustChanges)
On-system Open Houses	May 6 – Daybreak Parkway Station	UTA staff hosted in-person on-system “open house” events to share information about proposed changes with the public. Events were held in southern Salt Lake County to target the area where impactful Flex routes are proposed

	May 11 – Draper Town Center	to change, along with the installation of permanent on demand service.
	May 19, Draper FrontRunner Station	

The public comment period was held for 30 days from April 28 through May 28. Multiple methods for sharing information on the proposed changes and submitting official comment on the proposed changes were made available to the public. Methods for public comment included email, mail, phone, OpenUTA online comment form, the virtual public hearing, and in-person at customer service locations in three counties. Information on proposed changes was shared widely via newspapers of general circulation in the service area, local publications (City Journals), on-system signage at bus stops and on Flex Routes, UTA's website, and UTA's social media platforms, including Instagram, Facebook, and Twitter.

Public Hearing Notice

A detailed public hearing notice was distributed via newspapers of general circulation for publication on July 22, including the Daily Herald (Utah County), Deseret News, and the Salt Lake Tribune. The public notice was also shared via the Utah Public Notice Website. Proofs are included in Appendix 2.

Social Media

Facebook

Date & Link	Topic	Engagement
4/28	Announcing open public comment period	2,600 people reached; 31 engagements; 17 likes/reactions; 7 comments/replies; 7 shares; 175 total clicks
5/12	Virtual public hearing reminder	1,355 people reached; 15 engagements; 4 likes/reactions; 3 comments/replies; 4 shares; 68 total clicks
5/12	Virtual public hearing live stream	869 people reached; 15 engagements; 8 likes/reactions; 3 comments/replies; 3 shares; 97 total clicks
5/17	Notice of upcoming on-system event	9,832 people reached; 22 engagements; 10 likes/reactions; 2 comments/replies; 6 shares; 168 total clicks
5/19	Reminder about comment period	1,038 people reached; 5 engagements; 4 likes/reactions; 0 comments/replies; 1 shares; 12 total clicks
5/25	Reminder about comment period deadline	764 people reached; 7 engagements; 4 likes/reactions; 2 comments/replies; 1 shares; 32 total clicks

Instagram

Date & Link	Topic	Engagement
4/28	Announcing open public comment period	829 people reached; 41 likes/reactions; 2 comments/replies; 19 total clicks; 2 saves; 4 sends; 12 profile visits
5/12	Virtual public hearing reminder	569 people reached; 19 likes/reactions; 0 comments/replies; 3 total clicks; 1 saves; 4 sends; 3 profile visits

5/17	Notice of upcoming on-system event	863 people reached; 26 likes/reactions; 1 comments/replies; 8 total clicks; 1 saves; 2 sends; 5 profile visits
5/20	Reminder about comment period	638 people reached; 16 likes/reactions; 0 comments/replies; 6 total clicks; 2 saves; 1 sends; 5 profile visits
5/25	Reminder about comment period deadline	740 people reached; 32 likes/reactions; 0 comments/replies; 4 total clicks; 2 saves; 3 sends; 4 profile visits

Twitter

Date & Link	Topic	Engagement
4/28	Announcing open public comment period	4,245 people reached; 186 engagements; 5 likes/reactions; 1 comments/replies; 127 total clicks; 5 retweets; 5 clicks
5/12	Virtual public hearing reminder	3,440 people reached; 85 engagements; 5 likes/reactions; 2 comments/replies; 47 total clicks; 1 retweets; 0 clicks
5/17	Notice of upcoming on-system event	6,059 people reached; 290 engagements; 7 likes/reactions; 2 comments/replies; 108 total clicks; 4 retweets; 2 clicks
5/20	Reminder about comment period	4,245 people reached; 51 engagements; 2 likes/reactions; 0 comments/replies; 25 total clicks; 1 retweets; 2 clicks
5/25	Reminder about comment period deadline	3,035 people reached; 97 engagements; 5 likes/reactions; 1 comments/replies; 41 total clicks; 1 retweets; 0 clicks

Virtual Public Hearing

The virtual public hearing was held on Wednesday, May 12 at 6pm. The event was held over Zoom webinars and was broadcast on the RideUTA Facebook Live feed. Ten individuals from the public registered and attended the live event to make a comment on the broadcast. Closed captioning was provided during the webinar. A recording of the virtual public hearing was also available for viewing following the events on the UTA Facebook, YouTube channel, and OpenUTA page. **Facebook:**

- 361 views
- 7 reactions
- 4 comments
- Link to the event on Facebook:
<https://www.facebook.com/155897434439712/videos/399819904325195>

YouTube:

- 151 Views
- 4 Likes
- 0 Comments
- Link to the event on YouTube:
<https://www.youtube.com/watch?v=WEZ0CC27Dh8&t=1sWebsite>

Detailed information was shared via UTA's website. A carousel on the main page directed the public to detailed information on the proposed changes at rideuta.com/AugustChanges. The public hearing information was also included on the public hearing page of the UTA website.

Additional supporting information used for public information and engagement can be reviewed in Appendix 3.

Part 2: Public Comment Analysis

Engagement by the Numbers

Mode	Comments (#)
Email	9
Mail	0
Customer Service	16
OpenUTA	100
Virtual Public Hearing	10
Total Official	135
Unofficial	
<i>Social Media</i>	23

Public Comment Overview

Comments received during the 30-day comment period largely expressed concern about the proposed changes. People are often more driven to provide comments when they feel impacted by a proposal and given that the proposal for August 2021 suggested major service changes, this is understandable. Additionally, it is likely (based on language, style, and repetition), that multiple comments per individual were submitted in some cases, which could have skewed the data to reflect additional opposition.

Comment Themes

Theme	Description	Comments (#)
Route & mode-specific	Comment refers to a specific route or mode that should be changed/improved/restored	94
Flex/On Demand	Comment refers to the proposed switch from Flex bus routes to On Demand service	20
Accessibility	Comment expresses concerns around accessibility, including ADA and wheelchair, language, and technology	18
Service Restoration	Comment refers to, or requests, information about service restoration and return to pre-COVID schedules/frequency	14
Connectivity & Coverage	Comment describes need for improved connectivity and coverage in schedules and modes	12
On Demand Service only	Comment is specific to feedback on the On Demand service	10

Span of Service	Comment provides feedback on span of service, including hours and days of operation (service earlier, later, and on weekends)	10
Ridership	Comment suggests an impact to ridership based on changes or service	3
Reliability	Comment specifically mentions reliability of services, getting a ride when they need one	2
Workforce	Comment mentions concern for shift in UTA workforce with proposed changes	1

Comment Sentiment

Concern	Support	Suggestion	Question/Follow Up
82 comments	3 comments	36 comments	15 comments

The tables above provide an overview of the major themes and sentiments expressed in the comments. Each comment was individually coded for themes and sentiment. As noted in the tables, many of the comments related to specific routes and modes, including expressed support for the Flex routes (proposal to discontinue), as well as requesting service be restored or changed on specific bus routes, TRAX, and FrontRunner. The proposed switch from Flex to On Demand service in the southern Salt Lake County elicited many comments, with concerns about accessibility and reliability. As mentioned above, most of the comments expressed concern over proposed changes; many comments provided “suggestions” regarding service.

**Note: the number of themes and sentiments in the tables above will add up to more than 135; this is because multiple comments expressed more than one theme.*

Additional Public Engagement

- **On Demand** – UTA’s On Demand service began piloting in November 2019 in the southern part of Salt Lake County. Since the original implementation, there has been ongoing engagement with the public and stakeholders to broadly understand experiences and areas for improvement with the system. Ridership trended well prior to COVID and received positive feedback from the community, including riders who indicated they would ride again and would recommend the service to others. UTA’s Innovative Mobility Solutions Department has been proactive in collecting specific feedback and suggestions from the community and riders, as well as finding ways to implement feedback to improve the customer experience.
- **Special Services** – Due to lower ridership numbers on the Flex routes proposed for discontinuation and replacement by On Demand service, the Special Services Department has been able to make individualized contact and connection with the riders to support their transition to the new mode. The following efforts are being led by Special Services:
 - Identification of all paratransit eligible people in the On-Demand zone. Active and not active riders.

- Mailed letters to all active paratransit riders funded through DSPD in the zone with proposed changes. (DSPD - Division of Services for People with Disabilities).
- Test Via/Paratransit connections with UTA staff and members of UTA's Committee on Accessible Transportation (CAT).
- Follow-up phone calls to above group.
- Mail letters to all paratransit eligible people in the On-Demand zone with finalized changes and Via/Paratransit scheduling steps.
- Follow-up phone calls and offer travel training to all paratransit riders who could potentially make a Via trip and connect to a paratransit trip at a connection point within the zone.
- Distribute information to current F-Route riders on UTA vehicles.
- Final notification letter.
- Internal communications for UTA Customer Service, Special Service drivers and staff that outlines trip scheduling processes.
- **Communications & Outreach** – throughout the comment period and ongoing until and after August Change Day (August 8), rider communications to increase understanding and awareness of the changes will be provided through UTA's regular channels, including social media, website, and email.

August 2021 Service Changes

In response to public input received in April-May 2021, the final proposal for service changes was updated to reflect:

- Opposition to the Route 11/New Route F11 discontinuing service to the University of Utah Hospital. Connection to the University of Utah Hospital is retained in F11 routing.
- Service restoration, including increased frequency on a variety of routes and modes, including TRAX and FrontRunner, has been announced – this was both planned and in response to public input.

Summary of Findings

Through the public engagement process, 135 official public comments were received, and additional interactions at open house events and on social media provided context for the proposal and planning process.

- Both route/mode-specific comments, as well as service restoration were topics of concern and question. Information on all service changes (major and minor) for August Change Day 2021 had not been publicized at the time of the comment period. It may be beneficial to share comprehensive information all at once with the public, as possible.
- The proposal to switch from Flex bus to On Demand service in southern Salt Lake County created concern and apprehension for riders. These Flex routes have a small, but dedicated ridership who shared their uncertainties around switching modes, particularly with On Demand creating more responsibility for the customer to request rides. Providing ongoing information about and support for the transition will be important.
- Accessibility
 - People with Disabilities – ADA and mobility device accessibility came up in the comments and during the public hearing. On Demand fleet adjustments may be considered to better accommodate mobility devices.
 - Language – particularly Spanish language materials and information was identified as a great need during the public open house events held on the system.

- Technology – with the shift to On Demand service in some areas, UTA should consider technology and digital barriers that people may experience and find ways to improve options for booking a ride.
- On Demand service – questions from the public remain about how UTA’s On Demand services work, including bike carrying capacity, pick up/drop off locations, navigation, hours of operation, payment, and requesting rides. Ongoing communication and outreach with the community about this service will be beneficial.
- Other service improvement comments, including span of service, reliability, connectivity, and coverage point to an ongoing interest from the community in improving the transit network.

Appendix 1 - Proposed Changes

Routes changed with a new service type

- **Route F504**—Replaced by UTA On Demand
- **Route F518**—Replaced by UTA On Demand
- **Route F534**—Replaced by UTA On Demand
- **Route F546**—Replaced by UTA On Demand
- **Route F547**—Replaced by UTA On Demand

(See Proposed UTA On Demand service area)

Routes changed with a reduction in frequency

- **Route 871**—Reduce frequency during midday due to low ridership

Routes changes with a new service type, new route alignments, and expanded service

- **Route 11**—Replaced by F11, increased weekday service to 30 min and added Saturday service **(See F11 Map)**
- **Route 232**—Replaced by F232, increased weekday service to 30 min and added Saturday service **(See F232 Map)**
- **Route 525**—Replaced by F202, F525 increased weekday service to 30 min and added Saturday service **(See Maps: F202, F525)**
- **Route F514** — Increased weekday service to 30 min.
- **Route F556**—Extend to 7800 South, discontinue route on Copper City Dr., 6200 South (served by 54); discontinue loop around Lake Park Dr. (served by 513) **(See F556 Map)**
- **Route F578**—Extend to 5600 West, discontinue Jordan Landing loop (served by 240, F570); discontinue service at Bingham Junction Station (TRAX access at Gardner Village Station) **(See F578 Map)**

Appendix 3 - Supporting Information

UTA is proposing changes to its service this August and we want your input. The changes are designed to increase flexibility and access, improve connections to bus and rail services, and increase mobility.

Visit www.rideuta.com/AugustChanges to learn more about the proposed changes and how you can submit your feedback and comments. We want to hear from you!



1. Ad ran in City Journals.

2. Proposed changes informational flyer used on bust stops and in buses



Proposed Changes

to Flex Routes in southern Salt Lake County

We are...

- **Improving** flexibility and access to increase your mobility
- **Connecting** you to transit where and when you need it
- **Replacing** Routes with UTA on Demand



August 2021 Change Day is coming.

Be prepared. Ask questions. Provide comments. We want hear from you.

To leave comment:
 Call 801-743-3882 option 5
 or rideuta.com/AugustChanges




801-RIDE-UTA | RIDEUTA.COM | [@RIDEUTA](https://twitter.com/RIDEUTA)

- 3. Half sheet handout for public to make comments on proposed changes available in Spanish and English.

Cambios Propuestos
para las Rutas Flex en el sur del condado de Salt Lake

Proposed Changes
to Flex Routes in southern Salt Lake County

Estamos...

- **Mejorando** la flexibilidad y el acceso para aumentar su movilidad
- **Conectándolo** con el tránsito donde y cuando usted lo necesita
- **Reemplazando** las rutas con "UTA on Demand"



Se aproxima el día del cambio en agosto de 2021.

Haga preguntas. Aporte sus comentarios. Queremos escuchar su voz.

Para dejar un comentario: Llame al 801-743-3882, opción 5 o visite rideuta.com/AugustChanges



We are...

- **Improving** flexibility and access to increase your mobility
- **Connecting** you to transit where and when you need it
- **Replacing** Routes with UTA on Demand



August 2021 Change Day is coming.

Be prepared. Ask questions. Provide comments. We want hear from you.

To leave comment: Call 801-743-3882 option 5 or rideuta.com/AugustChanges



UTA 801-RIDE-UTA | [RIDEUTA.COM](https://rideuta.com) | @RIDEUTA

UTA 801-RIDE-UTA | [RIDEUTA.COM](https://rideuta.com) | @RIDEUTA

- 4. Promo code for on demand service

HAIL VIA. RIDE UTA.

UTA ON DEMAND VIA

YOUR FIRST TWO RIDES ARE FREE:

UTAFLEX

NEW RIDERS ONLY. EXPIRES 12/31/2021

DOWNLOAD THE VIA APP AND START RIDING

Rides are just \$2.50 and \$1.25 for seniors/reduced fare, plus transfers to other UTA services are covered in your fare.

Learn more:

Download the Via app

 Or call 385-217-9191 to book

rideuta.com/via

UTA

**RESOLUTION OF THE BOARD OF TRUSTEES OF THE UTAH
TRANSIT AUTHORITY APPROVING THE TITLE VI SERVICE AND FARE
EQUITY ANALYSIS FOR DECEMBER 2021 CHANGE DAY**

R2021-12-04

December 1, 2021

WHEREAS, the Utah Transit Authority (the “Authority”) is a large 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 Service and Fare Equity Analysis of the December 2021 Change Day (“Title VI Equity Analysis”) prepared by Authority staff; and

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

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

1. That the Title VI Service and Fare 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 Executive Director, staff, and counsel 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 1st day of December 2021.

DocuSigned by:

Carlton Christensen

80E38485ACBE4D0...

Carlton Christensen, Chair
Board of Trustees

ATTEST:

DocuSigned by:

Shutts

8D8A6B67F3AA459...

Secretary of the Authority



(Corporate Seal)

Approved As To Form:

DocuSigned by:

David Wilkins

5E3257B1CF024B9...

Legal Counsel

Exhibit A

DECEMBER 2021 TITLE VI SERVICE AND FARE EQUITY ANALYSIS



Title VI Service and Fare Equity Analysis

December 2021

Utah Transit Authority

Contents

Introduction	3
Summary of Proposed Changes	3
Summary of Findings.....	3
UTA Policy and Definitions.....	4
Definitions	4
Major Service Change	6
Evaluation and Analysis of Service and Fare Changes	6
Disparate Impact and Disproportionate Burden	6
Finding a Disparate Impact	7
Finding a Disproportionate Burden	7
Proposed Changes.....	8
Route F522	8
Routes 451 & 454.....	9
Low-Income Reduced Fare Program.....	10
Analysis of Proposed Changes	11
Route F522	12
Routes 451	13
Route 454.....	14
Low-Income Reduced Fare Program.....	16
Conclusion.....	16
Appendix A – December 2021 Change Day Public Comment Report	18

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 2021. 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 potentially 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

UTA has proposed four major changes to service during the December Change Day. It is proposed to discontinue routes F522 and 454, modify route 451's alignment, and introduce a low-income reduced fare program. The discontinuation of any route, a change of alignment in excess of 25%, and fare change constitutes a major change. The low-income reduced fare program will be system-wide implemented in December and provide a 50% discount on fare to anyone that is below 150% federal poverty and completes an application to the program.

Summary of Findings

Of the proposed changes, only one area showed any potential disproportionate burden and disparate impact. The 454 and 451's rider surveys showed that the people utilizing the service were at or below ridership averages for low-income and minority populations. The low-income reduced fare program will serve low-income populations exclusively and ridership data shows that low-income riders have 5.4% more minorities than moderate to high income populations. Finally, the impact of the discontinuation of F522 yielded potential for both disproportionate burden and disparate impact. However, due to the immediate implementation of demand response service, the potential findings are negated by a more convenient and efficient transportation option for the area.

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 publications 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. *"Flex Route"* refers to a route that, upon request, can deviate from its fixed route to provide a curbside pick-up or drop-off of up to $\frac{3}{4}$ of a mile around the fixed route. Deviations from the fixed route cost an additional \$1.25.
- 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. *"Ridership Data"* The ridership data is the information gathered through the onboard survey showing the demographics of the people using a fare type and/or riding on a specific route. This data is used when analyzing proposed changes to fares and commuter routes. See below for the current ridership demographic gathered in 2019.

<i>Low-Income Ridership Average:</i>	
Population:	13,417
Low-Income Population:	4,515
Percent Low-income:	33.7%

<i>Minority Ridership Average:</i>	
Population:	13,378
Minority Population:	3,459
Percent Minority:	25.9%

- I. *"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 2014-2018 5-year population estimates provided by the American Community Survey (ACS).

<i>Low-Income System Average:</i>	
Population:	2,351,065
Low-Income Population:	404,688
Percent Low-income:	17.2%

<i>Minority System Average:</i>	
Population:	2,368,702
Minority Population:	546,507
Percent Minority:	22.9%

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 service 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

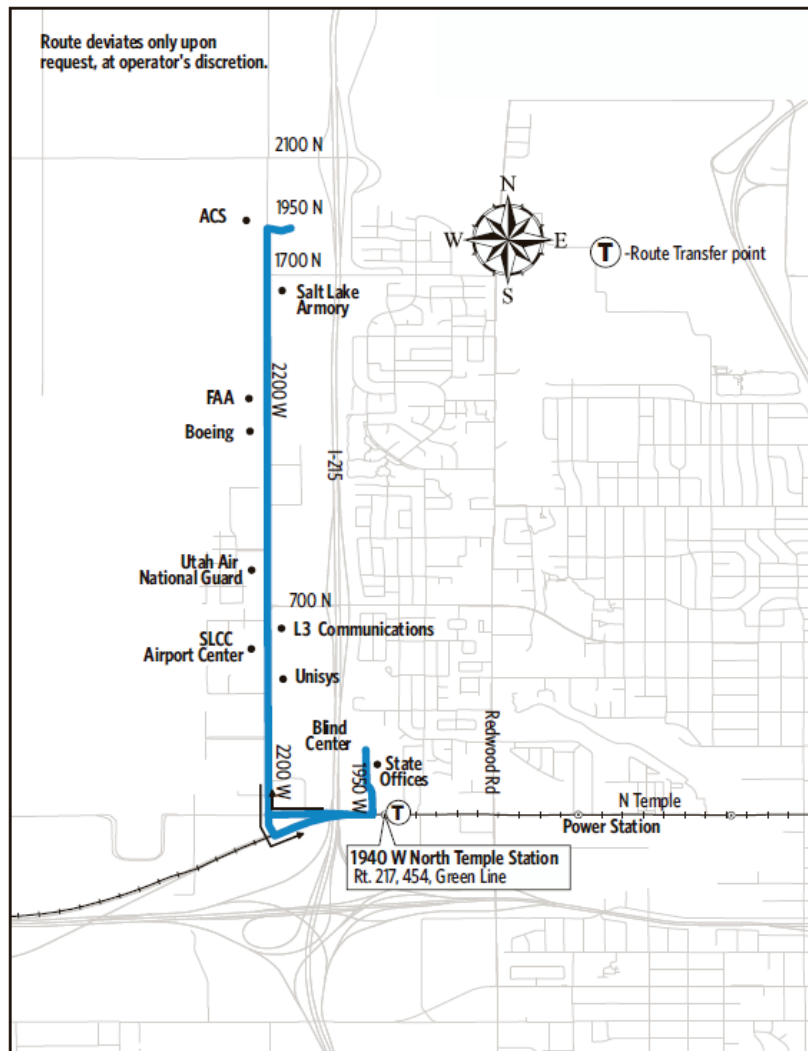
If at the conclusion of the analysis, UTA finds that low-income populations will bear a disproportionate burden of the proposed major service change, UTA will take steps to avoid, minimize, or mitigate impacts where practicable. UTA will also describe alternatives available to low-income passengers affected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

Proposed Changes

Route F522

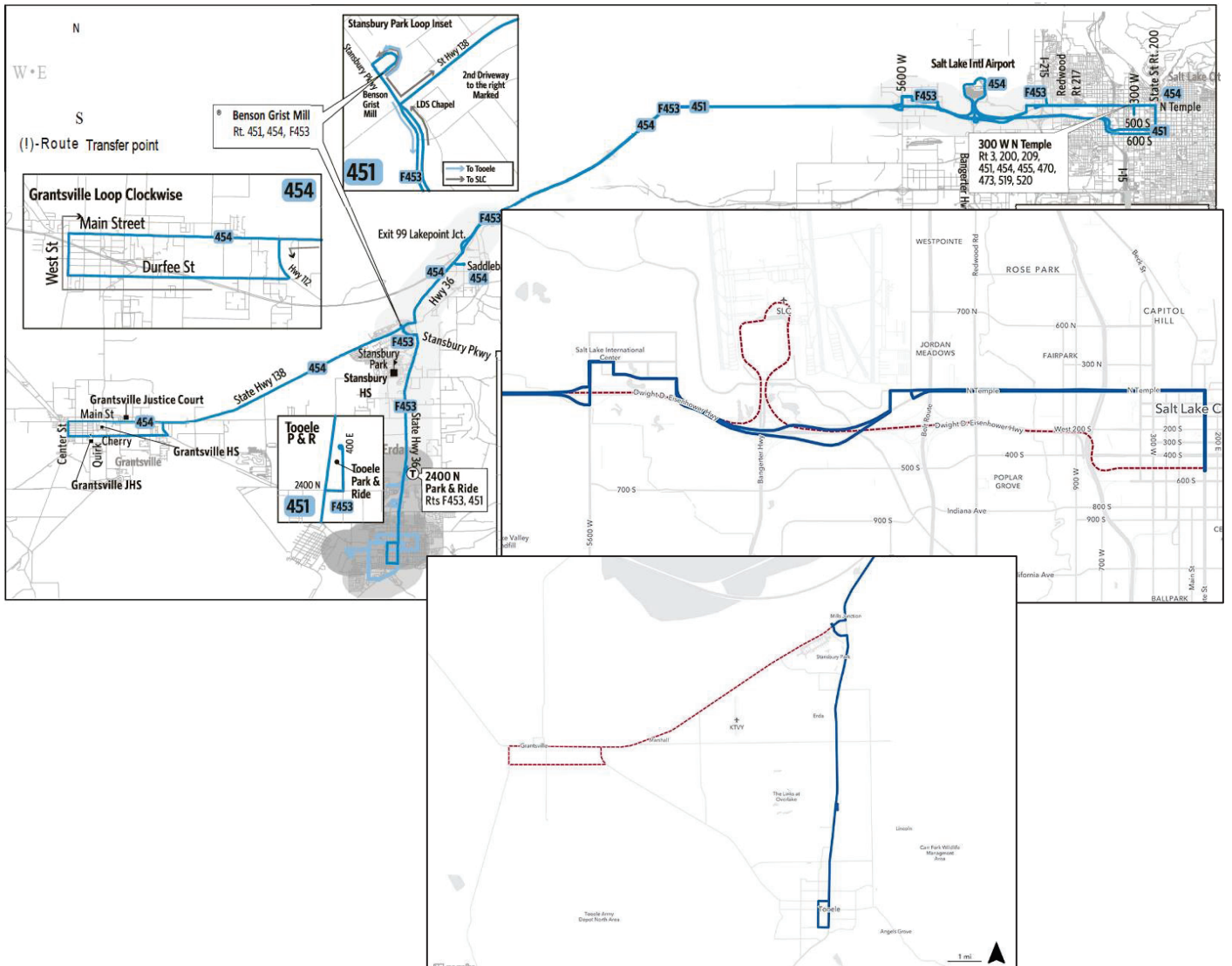
This flex route offers transportation from North Temple Station to various businesses north. As a flex route, it can deviate from the fixed route and provide drop off or pick up service within a ¼ mile radius of the route. All stops along the route are in commercial areas. Residential areas are only accessible on 700 North and 1700 North as the I-215 acting as a physical barrier to stops. Between the months of April and October of 2021 the route averaged 25.8 boardings per day and UTA shows that this route had zero scheduled deviations throughout the entirety of 2021 and very few unscheduled.

As a part of this change day, UTA in partnership with Salt Lake City, is also going to be implementing a demand response microtransit service in this area. UTA On Demand is a microtransit service provided by Via as part of a public private partnership. This service will cover all the residential areas that fell within the ¼ mile deviation area of the F522. Of note is the FTA's guidance found in FTA Circular 4702.1B which states that the circular's requirements do not apply to demand response services and Title VI equity analyses. As such, there is no official analysis being conducted on the introduction of this service. Rather, the inclusion of this information is to provide additional context and justification regarding the cancellation of route F522.



Routes 451 & 454

Routes 451 and 454 provide express commuter routes between Tooele County and Salt Lake City. These routes run only during morning and afternoon hours and have never returned to pre-COVID ridership levels. The 454 goes into Grantsville and the 451 goes into Tooele city. It has been proposed to modify the routing of the 451 to eliminate stops at the Salt Lake City International Airport, add stops to the Salt Lake International Center, and provide a more efficient route to locations in Downtown Salt Lake City. In conjunction with this, it is proposed to eliminate the 454 entirely which would eliminate service to Grantsville. Below is a map of existing and proposed routes. The new maps show a red dotted line to delineate eliminated routing and the blue route to show the new 451 alignment.



Low-Income Reduced Fare Program

UTA has piloted and is now proposing to make permanent a low-income program to provide a 50% discount to people that are participating in a program reserved for low-income households and individuals and/or can show that they are below 150% federal poverty levels. The application for the program is accessible online or in person at one of UTA's several customer service locations where all required documentation can be submitted. Once approved, a reduced fare card is issued to the applicant. The program participant can then use this card to either pay for their fare directly by loading a pre-paid card and tapping on and off. Pre-paid cards can be reloaded either online, at partnering retailers, or at a customer service location. Program eligibility lasts for one year after approval.

This program also eliminates a previous fare program for people utilizing the Horizon card from Utah's Department of Workforce Services (DWS) to purchase a regular monthly pass at a 50% discount. The low-income program differs from the Horizon pass program because it has expanded the number of potential riders that can access it. In order to buy the Horizon pass, the customer would need to be actively engaged in a DWS program and purchase the pass with the DWS issued card. The new program is available to all persons within the service area that can show eligibility.

Analysis of Proposed Changes

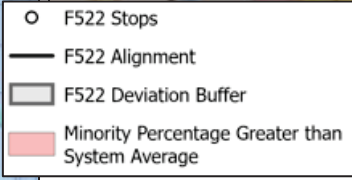
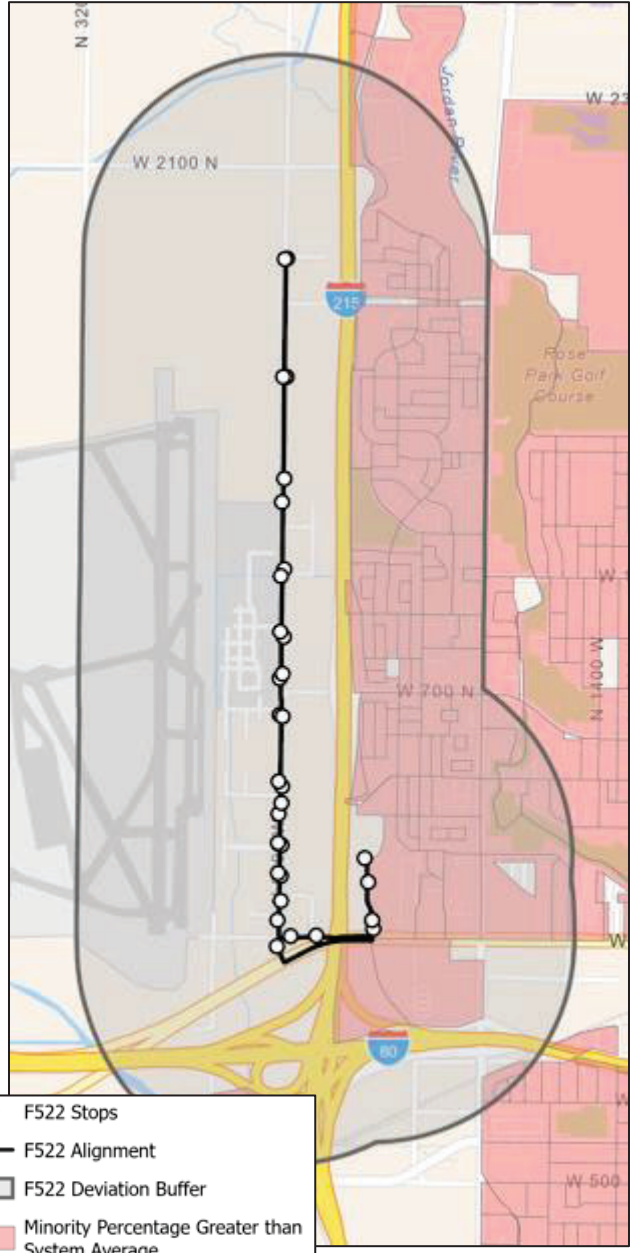
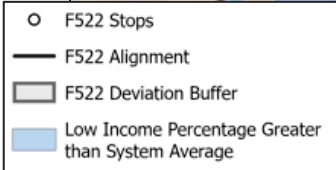
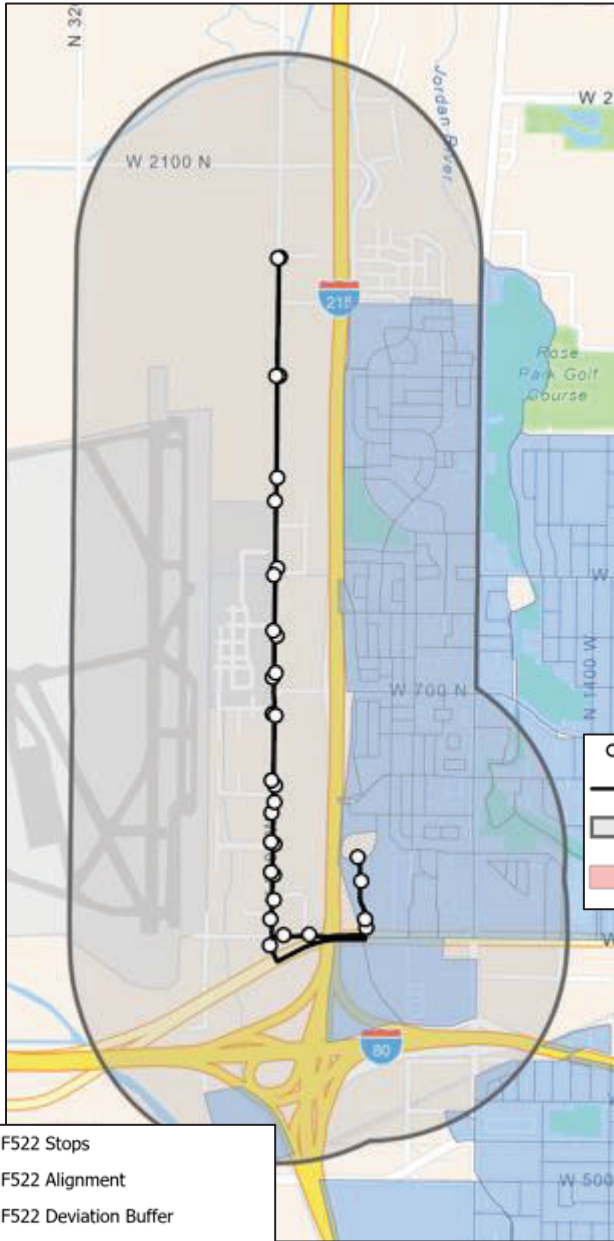
UTA has analyzed the potential impacts of any major service change as it relates to low-income and minority populations and evaluated the potential for adverse impact on these groups. To this end, UTA has created the maps, tables and related data found in this section. The data in this section was compiled utilizing American Community Survey (ACS) 2018 5-year estimates, which was dispersed into census blocks, in lieu of the larger block groups 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, flex route radii, and stations serviced by the impacted route. Some stop locations are approximate and may be in a different location once land is acquired or permissions are granted for land use. All bus stop locations have had a one quarter mile walkability radius applied to them, which was based on the actual accessibility of the stop or station by road. Flex routes have a three-quarter mile radius attached to the alignment due to the deviation capabilities of that service type. Any census block that was overlapped by any of these radii had 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.

Total low-income population was calculated using ACS household income data which excludes certain housing types where a “household” does not reflect those within certain types of living quarters (e.g., prisons, college dormitories, etc.). For this reason, the total minority population and the total low-income population differed at varying degrees contingent upon the number of this household type within the impacted area.

The maps in this section show the route, individual stops, flex route radii and census blocks with concentrations of low-income households or minority individuals above the system average shaded.

Route F522

Route F522 is a flex route, meaning it can deviate from its fixed route up to 3/4 miles and provide pick up or drop off service. It is primarily used to access businesses near the airport. Maps and data are included as part of the analysis.

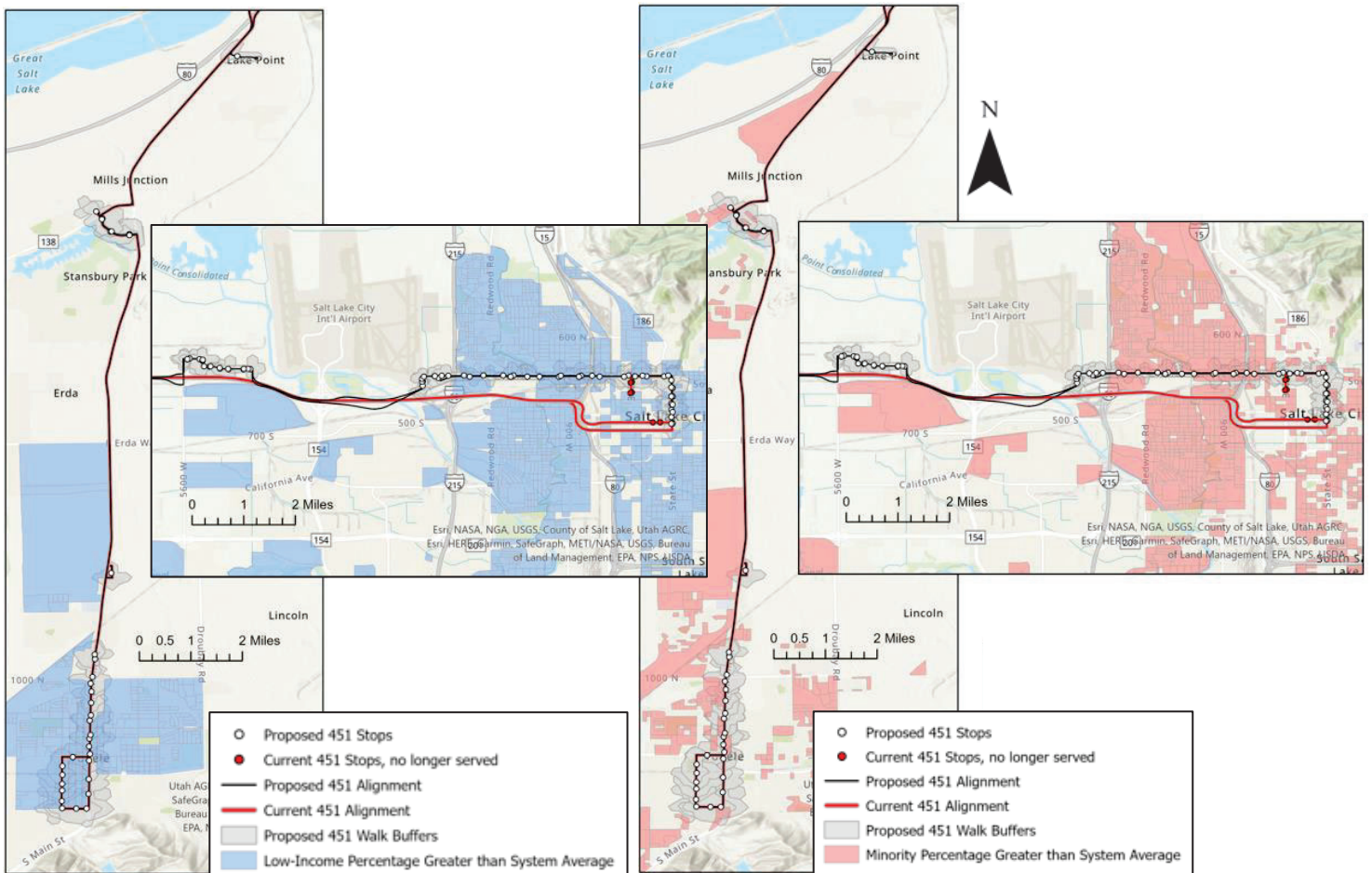


Low-Income on F522	
Population:	18,514
Low-Income Population:	8,014
Percent Low-income:	43.3%
<i>Difference from System Average:</i>	26.1%

Minority Population on F522	
Population:	18,722
Low-Income Population:	13,779
Percent Low-income:	73.6%
<i>Difference from System Average:</i>	50.7%

Routes 451

The 451 is a commuter route. As such, UTA has utilized the last ridership survey to review the changes according to FTA circular guidance on commuter routes. As such, the responses from riders on the 451 during the 2019 ridership survey are included below and then compared to the demographics of the entire survey.



Low-Income on 451:	Ridership
Population:	39
Low-Income Population:	5
Percent Low-income:	12.8%

Difference from total Ridership: -20.9%

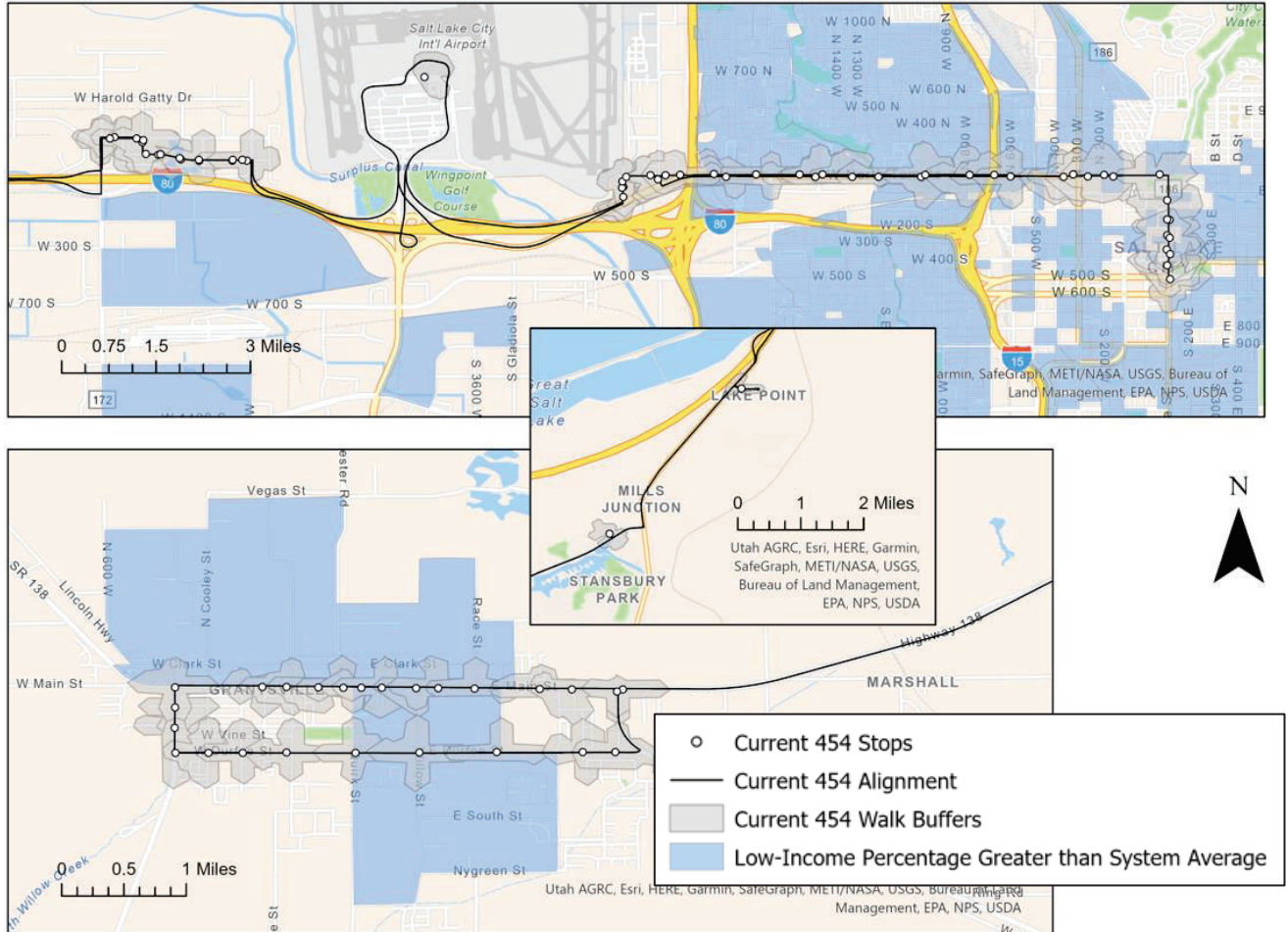
Minority Population on 451:	Ridership
Population:	34
Low-Income Population:	8
Percent Low-income:	23.5%

Difference from total Ridership: -2.4%

Route 454

As with the 451, this route is a commuter route and will be utilizing ridership data in its analysis.

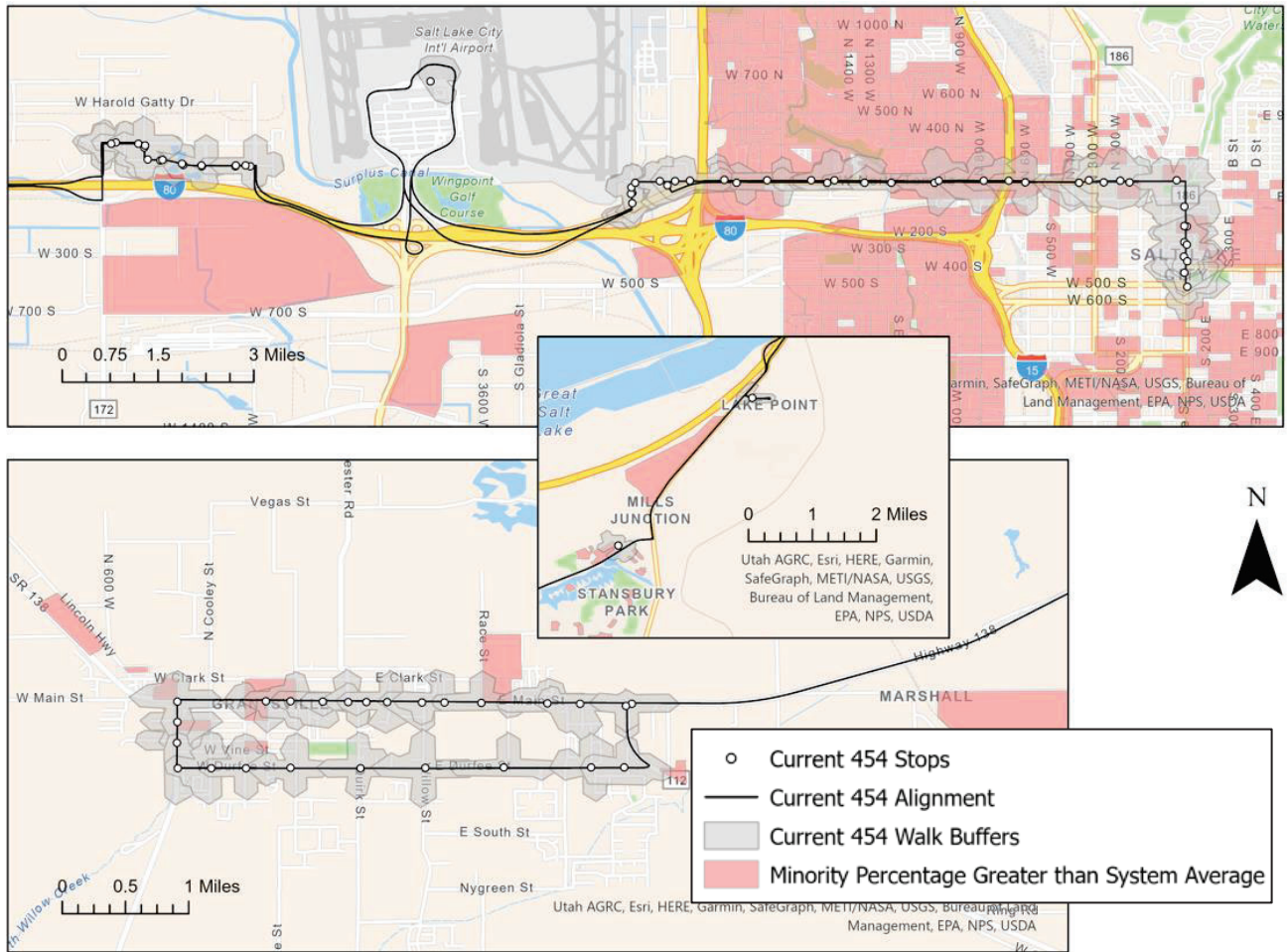
Below is a tabular representation of ridership data and maps of the route with areas including higher than average representations of low-income populations.



Low-Income on 454:	Ridership
Population:	21
Low-Income Population:	7
Percent Low-income:	33.3%

Difference from total Ridership: -0.4%

Below is a tabular representation of ridership data and maps of the route with areas including higher than average representations of minority populations.



Minority Population on 454:	Ridership
Population:	21
Low-Income Population:	2
Percent Low-income:	9.5%

Difference from total Ridership: 16.4%

Low-Income Reduced Fare Program

When evaluating fare changes, UTA utilizes information received through ridership surveys to determine the users of a particular fare media. This new program will be available to all people within the service area, so the dataset used is all people that utilize UTA's services. Due to the nature of the program, it is anticipated that 100% of program participants will be low-income according to UTA's chosen definition of 150% or less of the federal poverty rate. The following table shows the demographics of the riders that fall within the low-income parameters on the survey.

<i>Minority Population Within Low-Income</i>	
Population:	50,035
Low-Income Population:	15,638
Percent Low-income:	31.3%

Difference from total Ridership: 5.4%

Conclusion

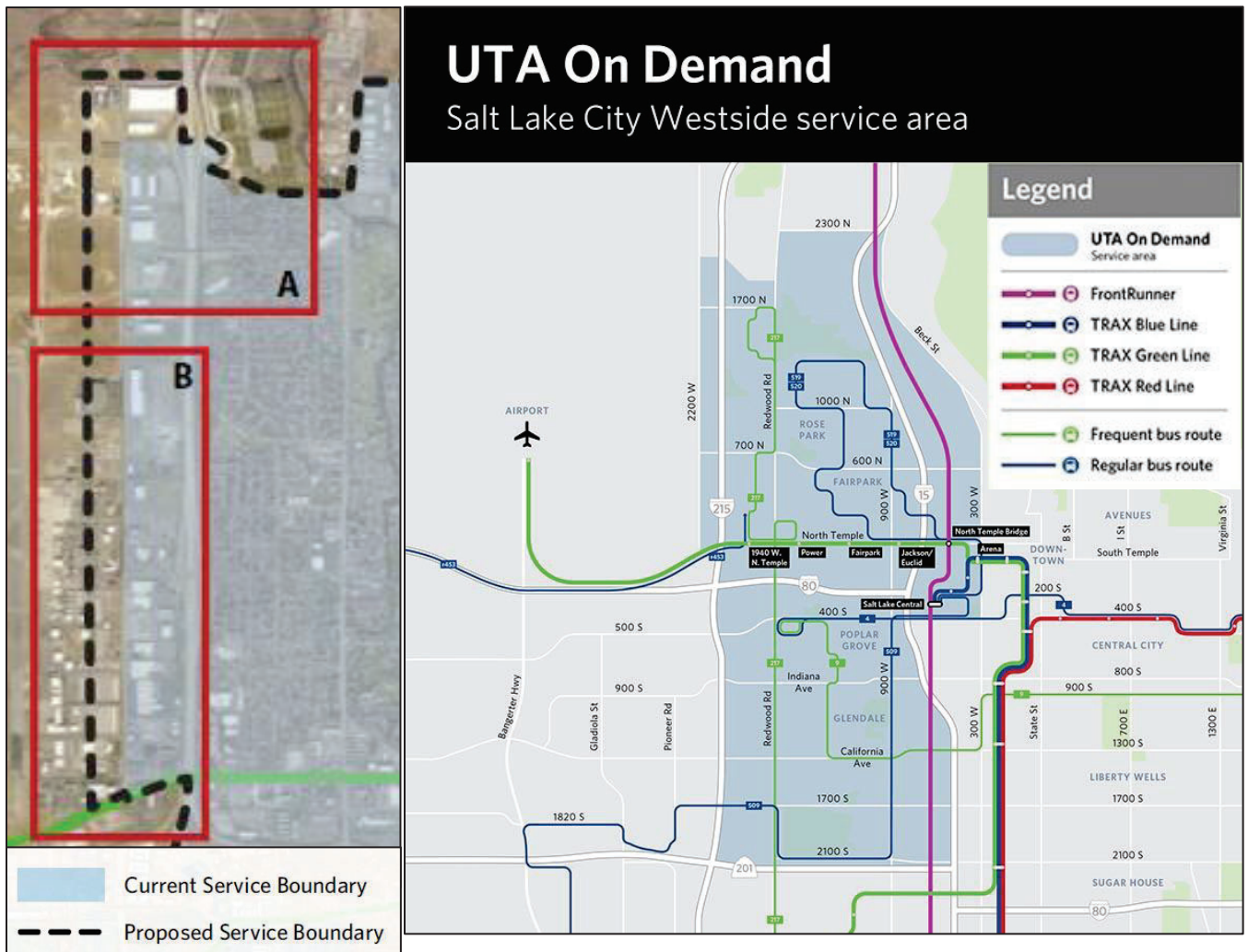
The proposal to discontinue route 454 and modify the alignment on route 451 did not exceed UTA's thresholds for potential disparate impacts and/or disproportionate burdens. The Low-Income Reduced Fare Program likewise did not show any potential negative impacts but will exclusively benefit low-income households which data shows have higher numbers of minorities than moderate to high income households. As such, there were no findings on the 454, 451 proposals.

Route F522

This route is in a majority minority area with dense populations of people below 150% poverty level. The data itself would show a high potential for both a disparate impact and disproportionate burden. However, as mentioned earlier in the analysis UTA is implementing its UTA On Demand microtransit service at the same time this route would be eliminated. The on demand service will cover all of the populated areas within the F522's service area and provide door to door service at the base fare price of \$2.50. This is better service than the existing F522 which is on the west side of the freeway while all populated areas are on the east side. The on demand service area was originally proposed to end on the street that was once serviced by the F522 but would not have provided service to areas on the west side of the street. See the map on the following page for the original proposed service area.

In order to better address the service area being vacated by the F522, UTA expanded the service area to areas marked out in the images at the bottom of this page.

Although there is substantial minority and low-income populations within the F522's service area, the immediate introduction of On Demand service acts as a mitigation for all negative impacts. UTA On Demand microtransit service is more readily accessible, versatile and less expensive than the existing option when the cost of deviations would be factored for. Beyond this implementation, there is little evidence that local riders utilized this route due to the lack of deviation and the physical barrier of the freeway that prevented them from ready access to the route. Therefore, UTA finds that there were no findings of disproportionate burden or disparate impact.



Appendix A – December 2021 Change Day Public Comment Report

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December 2021 Change Day – Public Involvement Report

Updated 11.11.21

Introduction

The Utah Transit Authority (UTA) proposed several major changes to transit service for implementation on December Change Day (December 12). Those proposed major changes can be reviewed in Appendix 1 of this report. UTA postponed the date of Change Day from November 28 to December 12. This Change Day includes various changes to bus and rail routes throughout the system, as well as the start of Ski Bus service in the Cottonwood Canyons, and to Snowbasin, Powder Mountain and Sundance. UTA delayed Change Day as the agency has been facing a shortage in bus operators, not unlike the experience of many other industries during these challenging times. By postponing Change Day to December 12, UTA hoped to have enough time to complete the hiring and training process of the personnel needed to maintain planned service.

The agency held a 30-day public comment period from October 4 through November 6 with multiple opportunities for the public to engage in the input process, including a virtual public hearing on October 20. This report details public involvement and feedback on the proposed changes.

Part 1: Public Engagement Efforts

Engagement Overview

Component	Dates	Additional Detail
Public Notice	October 4	A public notice was published across major news publications in areas with proposed major changes and on the Utah Public Notice Website.
Public comment period	October 4 – November 6	30-day period was required. Public notice was published. Comment was accepted via email, mail, online form, phone, and in-person at Customer Service locations.
Public hearing (Virtual)	October 20	15 days after public comment period announced, this public hearing was held virtually over Zoom. UTA staff presented information about proposed changes and answered questions. Registered participants were invited to provide public comment during the meeting. A recording was made available following the event.
Customer Service	October 4 – November 6	Customer service offices across the service area (3 locations) supported information sharing about proposed changes onsite for members of the public to learn more and provide comment.
Virtual engagement	October 4 – November 6	Available throughout the comment period online, included virtually accessible information and feedback opportunities through OpenUTA. (Rideuta.com/ChangeDay)
On-system engagement	October 14	Teams of two rode routes with proposed major changes, including routes 451, 454, and F522. They shared route specific information about proposed changes and how to comment. 451: Megan Waters, Jenna Simkins

		454: Sheri Webster, Samantha Aramburu F522: Shaina Miron-Quinn, Joann Scott
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The public comment period was held for 30 days from October 4 through November 6. Multiple methods for sharing information on the proposed changes and submitting official comment on the proposed changes were made available to the public. Methods for public comment included email, mail, phone, OpenUTA online comment form, the virtual public hearing, and in-person at customer service locations in two counties. Information on proposed changes was shared widely via newspapers of general circulation in the service area, on-system signage at bus stops, UTA's website, and UTA's social media platforms, including Instagram, Facebook, and Twitter.

Public Hearing Notice

A detailed public hearing notice was distributed via newspapers of general circulation for publication on October 4, including the Standard Examiner (Weber), Tooele Transcript, Deseret News, and the Salt Lake Tribune. The public notice was also shared via the Utah Public Notice Website. Proofs are included in Appendix 2.

Virtual Public Hearing

The virtual public hearing was held on Wednesday, October 20 at 6pm. The event was held over Zoom webinars and was broadcast on the RideUTA Facebook Live feed. Nine individuals from the public registered and attended the live event to make a comment on the broadcast. A recording of the virtual public hearing was also available for viewing following the events on the UTA Facebook, YouTube channel, and OpenUTA page.

Facebook:

- 972 People Reached
- 174 Engagements
- 14 Comments
- Link to the event on Facebook:
<https://fb.watch/99ud6oh4Xv/>

Youtube:

- 70 Views
- 1 Likes
- 0 Comments
- Link to the event on YouTube:
<https://www.youtube.com/watch?v=ul6ej2hGFuM>

Virtual Engagement

Social Media

Social media platforms, including Facebook, Instagram, and Twitter were used to promote awareness around the proposed change and encourage participation in the public comment period.

Facebook: 3 posts	Instagram: 2 posts	Twitter: 3 posts
10/6 – 3K reach, 153 clicks, 32 other engagements	10/6 – 41 likes, 1 comment	10/6 – 1 retweet, 1 like
10/18 – 2.3K reach, 26 clicks, 8 other engagements	10/20 – 11 likes	10/18 – 3 retweets, 2 likes
10/20 (Public hearing virtual live stream) – 975 reach, 159 clicks, 15 other engagements		10/20 – 2 retweets, 3 likes

Website

Detailed information was shared via UTA's website. A carousel on the main page directed the public to detailed information on the proposed changes at rideuta.com/ChangeDay. The public hearing information was also included on the public hearing page of the UTA website.

Additional supporting information used for public information and engagement can be reviewed in Appendix 3.

On-System Engagement

Teams of two rode routes with proposed major changes, including routes 451, 454, and F522. They shared route specific information about proposed changes and how to comment. Route-specific handouts were provided and left behind with operators to share with riders who were not onboard at the time of the engagement effort.

- Route 451, Salt Lake City to Tooele
 - Staff: Megan Waters, Jenna Simkins
 - 16 interactions
- Route 454, Salt Lake City to Tooele
 - Staff: Sheri Webster, Samantha Aramburu
 - 2 interactions
- Route F522
 - Staff: Shaina Miron-Quinn, Joann Scott
 - 4 interactions

Part 2: Public Comment Analysis

Engagement by the Numbers

Mode	Comments (#)
Email	18
Mail	0
Customer Service	10
OpenUTA	81
Virtual Public Hearing	7
Total Official	116

Public Comment Overview

Comments received during the 30-day comment period expressed concern about the proposed changes, requests for service restoration, and other service considerations such as travel time and frequency. Below includes a summary of the comments by theme. A complete list of public comments can be found in Appendix 4; UTA's response to comments is included in Appendix 5.

Comment Themes

Theme	Detail	Comments (#)
Route 451 Support	Comment supports the changes proposed to Route 451	4
Route 451 Oppose	Comment opposes the changes proposed to Route 451	42
451 Opposition & Travel Time	Many comments in opposition to the proposed changes to Route 451 cite increased travel times as a chief concern	31
Route 454 Support	Comment supports the changes proposed to Route 454	2

Route 454 Oppose	Comment opposes the changes proposed to Route 454	16
Route F522 Support	Comment supports the changes proposed to Route F522	0
Route F522 Oppose	Comment opposes the changes proposed to Route F522	6
On Demand	Concerns expressed around the F522 switching to On Demand and negative user reviews	2
Route 640 Support	Comment supports the changes proposed to Route 640	0
Route 640 Oppose	Comment opposes the changes proposed to Route 640	4
Other Routes	Comments referencing other routes largely referred to service restoration or suggestions for new service	39
Travel Time	Comment expresses concerns around travel times on transit (31/37 are in reference to proposed changes to Route 451)	37
Frequency	Comment requests increases in frequency of service on various routes	19
Connections	Comment requests improved ability to make transfers and connections between various modes	5
Coverage	Comment requests increase coverage by transit service	2
Span	Comment requests an improvement in span of services, both hours (earlier and later) and days of the week	9
Bus Stop/Construction	Comment expresses concern over closing/moving bus stops and related construction	4
Operators	Comment expresses concern over operator shortage and hiring/compensation practices	2
Ski Bus	Comment expresses concern over delay in start of ski bus service	3
Suggestions	Comment provides a suggestion for improving service and customer experience	25

The summary above provides an overview of the major themes and topics expressed in the comments. Each comment was individually coded for themes. As noted in the table, many of the comments related to specific routes and modes, including expressed opposition to the proposed changes for routes 451, 454, F522, and 640. Many comments referred to other routes (not those with proposed major changes) and included requests for service to be restored or changed (increased frequency, increased span of service, etc.) on specific bus routes, TRAX, and FrontRunner. Many comments were also flagged as “suggestions”, which included either alternatives to proposed changes or additional new service suggestions.

**Note: the number of themes in the tables above will add up to more than 116; this is because multiple comments expressed more than one theme.*

Additional Public Engagement

- On Demand** – UTA’s On Demand service began piloting in November 2019 in the southern part of Salt Lake County. Since the original implementation, there has been ongoing engagement with the public and stakeholders to broadly understand experiences and areas for improvement with the system. Ridership trended well prior to COVID and received positive feedback from the community, including riders who indicated they would ride again and would recommend the service to others. UTA’s Innovative Mobility Solutions Department has been proactive in collecting specific feedback and suggestions from the community and riders, as well as finding ways to implement feedback to improve the customer experience. A new On Demand service will

replace route F522 should the proposed discontinuation move forward. A robust communication and engagement effort will be implemented to support the adoption and transition to the new service.

- **Special Services** – Vanpool has been supportive of identifying opportunities to replace fixed and flex route service for riders where appropriate.
- **Communications & Outreach** – throughout the comment period and ongoing until and after December Change Day (December 12), rider communications to increase understanding and awareness of the changes will be provided through UTA’s regular channels, including social media, website, and email.
- **Stakeholders** – UTA has worked closely with stakeholders to inform them of the proposed changes and delay in Change Day, including ski resorts.

Summary of Findings

Through the public engagement process, 116 official public comments were received.

- The proposed major changes drew comments in opposition of the changes, with the most feedback received on the proposed routing modification to Route 451, where riders expressed concern over increased travel times.
 - **If proposed changes are implemented, UTA should continue monitoring ridership and travel times to support Tooele County riders.**
- Feedback was also received about the proposed discontinuation of Route 454 from Grantsville, expressing concern about travel to the Benson Grist Mill Park & Ride stop. Additionally, several comments were received regarding proposed discontinuation of Route F522 and modifications to Saturday service on Route 640.
 - **Providing and supporting access to alternative options will be important should changes move forward.**
- Many comments referred to other routes beyond those with proposed major changes, largely to request service restoration, increased frequency, and improved span of service.
 - **Information on all service changes (major and minor) for December Change Day 2021 had not been publicized at the time of the comment period. It may be beneficial to share comprehensive information all at once with the public, as possible.**

Appendix 1 - Proposed Changes

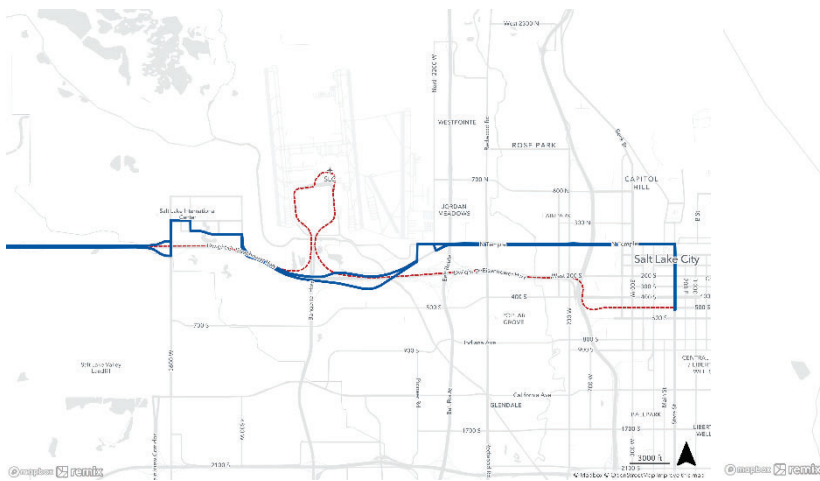
Route 640: Reduce Saturday service from 30 minute to 60 minute.

Route F522: Discontinue route.
Service will be replaced with [UTA On Demand](#) coming soon.

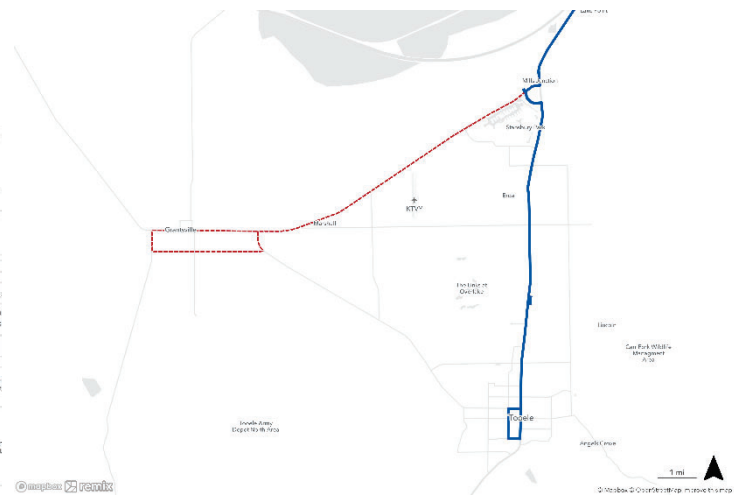
Route 454: Discontinue route.
Riders can pick up Route 451 at Benson Grist Mill. Learn more about [alternative transportation resources from Tooele County](#).

Route 451: Modify routing to serve International Center and North Temple.
Add stops and connect with TRAX at 1940 W. North Temple. Modified route will cover the service provided by Route 454 and connecting riders to Salt Lake City.

Salt Lake Valley – Routes 451 & 454



Tooele Valley – Routes 451 & 454



(The red line on the maps above shows the proposed discontinuation of Route 454 from Grantsville to Salt Lake City. The blue line on the above map shows the proposed modified routing for Route 451 from Tooele to Salt Lake City.)



Appendix 2 – Public Notice Proofs

Public Notice was published in the Salt Lake Tribune (online & print), Standard Examiner, Tooele Transcript, Deseret News, and the Utah Public Notice Website.

THE SALT LAKE TRIBUNE

PROOF OF PUBLICATION

STATE OF UTAH }
County of Tooele } ss.

NOTICE OF PUBLIC HEARING AND COMMENT PERIOD
UTAH TRANSIT AUTHORITY
RE: December Service Changes. The Utah Transit Authority (UTA) is proposing several changes to transit service beginning on December 12. The proposed changes would reduce service on low ridership routes and shift resources given the labor shortage. A 30-day public comment period will occur October 4 through November 6; one virtual public hearing, along with several other community engagement opportunities, will be held to gather feedback.
Public Comments: Relevant information about the proposed service changes will be available at the Public Hearing and on the UTA Website at ridauts.com/Change-Day. The proposed changes will be available for public review and comment from Oc-

I, Scott C. Dunn, being first duly sworn, depose and say that I am the Publisher of the Tooele Transcript-Bulletin, a twice-weekly newspaper of general circulation published each Tuesday and Thursday at Tooele City, Tooele County, Utah; that the notice attached hereto and which is a part of the proof of publication of

Notice of Public Hearing
Utah Transit Authority

was published in said newspaper for one issue(s), the first publication having been made on the 5th day of October, 2021, and the last on the 5th day of October, 2021; that said notice was published in the regular and entire issue of every Tuesday edition of the newspaper during the period and time of publication, and the same was published in a newspaper proper and not in a supplement. Said notice was also placed online at www.utahlegals.com.

NOTICE OF PUBLIC HEARING AND COMMENT PERIOD

UTAH TRANSIT AUTHORITY

RE: UTA Tentative Budget 2022. UTA is holding a public hearing to receive input on its 2022 Tentative Budget.

Public Hearing Date & Format:

There will be a public hearing held on **Thursday, November 4 at 3:30 p.m.** at UTA's downtown Salt Lake City office at 669 West 200 South. Please consider current CDC COVID-19 guidelines regarding masking and distancing for in-person attendance.

Prior to the public hearing, from 3:00-3:30 p.m., UTA will hold a Public Budget Open House to allow the public to review and discuss the budget with UTA representatives. During this time, in addition to having specific questions answered, the public may submit written comments to UTA. At 3:30pm, as part of a specially scheduled UTA board hearing, individuals may provide verbal comment directly to UTA's Board of Trustees.

Options for remote viewing and remote public comment will be available. For instructions on how to comment or view the meeting remotely please go to www.ridauts.com/Board-of-Trustees/Meetings. In the event of technical difficulties with remote participation, the meeting will proceed in person and in compliance with the Open and Public Meetings Act.

To assure full participation at the hearing, accommodations for effective communication such as sign language interpreters, printed materials in alternative formats, or a language interpreter for non-English speaking participants, must be requested at least two (2) working days prior to the date of the scheduled event. Requests for ADA or language accommodations should be directed to calldredge@ridauts.com or 801-287-3536, or dial 711 to make a relay call for deaf or hearing impaired persons.

Public Comments:

In addition to the hearing, the tentative budget will be available for public review and comment from **November 4, 2021 – December 4, 2021**. During the 30-day comment period the public can submit comments via email, online, mail, or phone. Information on the 2022 Tentative Budget may be found at www.ridauts.com/budget or viewed in person at UTA Headquarters, 669 W 200 S, Salt Lake City, UT.

Comments must be received, postmarked or electronically submitted to UTA through one of the following methods by **5pm on December 4, 2021**, to be considered as part of the public comment record.

- **Email:** hearingofficer@ridauts.com
- **Phone:** 801-743-3882
- **Mailing:** Utah Transit Authority, C/O Megan Waters, 669 W 200 S, Salt Lake City, UT 84101
- **Website:** www.ridauts.com/budget

SLT0014382

Appendix 3 - Supporting Information

NOTICE OF PROPOSED CHANGES TO SERVICE

UTA is proposing several changes to service starting December 12, 2021

UTA propone varios cambios al servicio a partir del 12 de diciembre de 2021.

640: Saturday service will be reduced to 60 minute. servicio sabatino reducido.

451: This route will have modified routing to serve the International Center
Desviar la ruta 451 de SL al Centro Internacional y a la estación TRAX de 1940 W

454: Discontinue. Take Route 451 instead of/from Salt Lake City. Suspender la ruta 454 de SL

F522: Discontinue. Instead take UTA On Demand service in Rose Park. Suspender la ruta F522

To learn more and provide comments:
Para aprender más y dar su comentario:
rideuta.com/ChangeDay
801-RIDE-UTA (801-743-3882), option 5



Oct 4-Nov 6

December 12, 2021 Change Day 12 de diciembre de 2021, día de cambios

UTA is proposing several changes to service starting December 12, 2021. These changes address the bus operator shortage at UTA, as well as align with our ongoing assessment of bus route ridership and efficiency. Learn more at rideuta.com/ChangeDay

UTA propone varios cambios al servicio a partir del 12 de diciembre de 2021. Estos cambios abordan la escasez de operadores de autobuses de UTA y se alinean con nuestra evaluación continua de la cantidad de usuarios de autobús y eficiencia de la ruta. Obtenga más información en rideuta.com/ChangeDay

Proposed Changes:

- Ogden route 640: reduced Saturday service
- Discontinue SL route 454
- Deviate SL route 451 into the International Center and 1940 W. TRAX Station
- Discontinue F522

Cambios propuestos:

- Ruta 640 de Ogden: servicio sabatino reducido
- Suspender la ruta 454 de SL
- Desviar la ruta 451 de SL al Centro Internacional y a la estación TRAX de 1940 W
- Suspender la ruta F522



rideuta.com



1. Proposed changes informational flyer used on bus stops and in buses, Spanish & English

2. Informational Flyer for Customer Service locations, Spanish & English

Proposed Changes: Route F522

UTA is proposing several changes to service starting December 12, 2021. The proposed changes are based on low ridership and efficiency on these routes.

- > Route 640: Reduced Saturday service
- > Route 454: Discontinue
- > Route 451: Modify routing to serve International Center & North Temple
- > Route F522: Discontinue

Rt F522:
Avg. 32 boardings /day (0,21)

We are collecting feedback from the community on these proposed changes October 4 through November 6. Share your thoughts on the proposed changes with UTA by visiting rideuta.com/ChangeDay or calling: 801-743-3882, option 5.

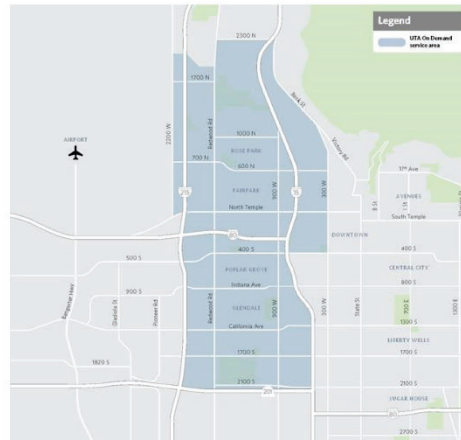
A virtual public hearing will be held over Zoom on Wednesday, October 20 6-7pm. Register to participate on Zoom or listen only by tuning into the livestream on RideUTA on Facebook.



rideuta.com/ChangeDay
801-743-3882

Alternative Options:

- > UTA On Demand is launching in this area. You'll have access to more destinations in this neighborhood with this new service. Visit rideuta.com/OnDemand to learn how it works, or give us a call: 801-743-3882
- > Vanpool - if you travel daily on F522 to a workplace, vanpool might be the right option. Find out more: rideuta.com/Vanpool



3. Example of the route-specific flyer used for on-system engagement, Spanish & English

Appendix 4 – Public Comments

A complete list of the 116 public comments received.

#	Comment
1	<p>Good morning,</p> <p>I ride the front runner M-F and use the UVX tran M-F.</p> <p>At the Provo station, the UVX goes directly to the J Bay. Before it used to stop right before the crosswalk. I imagine the change was made to protect the pedestrian. However, why could it not stop at Bay A? It is right by the entrance to the front runner. It would be even safer since passengers would be on the same side as the front runner and the buses.</p> <p>When the front runner comes into the Provo station, it would be an advantage to the passengers to have the UVX tran waiting in Bay A, instead of Bay J. A couple of weeks ago, the front runner was a few minutes late into the Provo station. As I walked across to catch the Express and just as I was about to reach it, it pulled out. I missed it by 10 seconds. Again, if it was waiting at Bay A, I would have made it.</p> <p>Also, I travel from Saratoga Springs to the American Fork station. Is there any future plans of having a bus stop in Saratoga Springs to bring passengers to the American Fork station in time to catch the front runners, the first being at 5:51am?</p>
2	<p>Thank you for your time.</p>
3	<p>Can we bring back the front runner that leaves Clearfield at 7:54? That would be great! 7:24 gets in too early and the 8:24 gets in too late. Your ridership would probably go back up.</p>
4	<p>I would like to propose a change for the red line trax on weekends from daybreak to the U medical center. I would like to request earlier trax even if it is less frequently on weekends just because nurses, house keeping and other staff members work weekends and start early 630 or 7. It's also so helpful during winter months with snow.</p>
5	<p>Thank you for your time and consideration</p>
6	<p>It would be great to have a direct to ski area open from Sugarhouse. I have to drive to a crowded parking lot and wait in line for a bus. What if there were direct buses from areas in the valley where I could park at a less crowded lot that's closer to my house and go straight to the ski areas.</p>
7	<p>I would like to request that an additional southbound time be added to frontrunner between the 3:42pm and 4:42pm arriving at Lehi.</p>
8	<p>That time used to be there before the Pandemic, I would like to bring it back.</p>
9	<p>Please Please Please don't discontinue the service to Grantsville! Getting to the mill stop poses a significant issue for my family. The Grantsville stop is walking distance to my home for my husband, who uses this bus to get to work! Please!</p>
10	<p>I tried adding my thoughts to the public comment page, but it wouldn't ever let me.</p>
11	<p>Hello, I am a rider of UTA 454. I live in Grantsville but I work in Salt Lake. I have relied almost exclusively on the 454 since moving to Utah in 2013. In the past, there was a single route in the mornings, picking up around 6 am and then leaving Salt Lake around 4 pm. While moving to the two routes in the mornings and afternoons has made it more convenient, I recognize that there usually are not enough riders to justify the two routes. Rather than discontinue the 454 altogether, would it be possible to go back to a single route in the mornings and afternoons?</p>

8	<p>Hello,</p> <p>I have been riding Route 451 for 11 years and I work in Salt Lake City. One of the main reasons why I bought my house in Tooele is because of this. I could still take public transportation and it is relatively comfortable and quick.</p> <p>The reason I don't agree with this proposal is Route 451 is the ONLY way to get to Salt Lake City with reasonable time. We DON'T have any other options like trains or TRAX. With this option, you would take away our transportation needs. Adding those proposed routes can easily add 30 minutes or longer each way which we don't have.</p> <p>UTA had already made changes with Routes 451, 453, and 454 and you had reduced the frequency and convenience for some people. I did understand why you did it, And now you are going to reduce the ONLY option to go to Salt Lake City. That would be very difficult for daily commuters like myself.</p> <p>As a Tooele county resident, we already feel that we are like a stepchild even though we pay taxes like everybody else. We have not had any major road improvements or public transportations like TRAX or train even though we already have railroads available in our county.. Now you would take away our already very limited options. Please reconsider and rethink the proposal. It will be greatly appreciated.</p>
9	<p>Please do not make changes to BUS 451 as it would add significant time to my commute and several of my coworkers. I know it seems that the BUS 451 is not being used a lot right now, but that is because we are still working from home. When our employer calls us back to work in the office, the bus will be needed much more. This would add significant time to my commute and I would be incentivized to drive, rather than use the bus.</p>
10	<p>I understand ridership is down but taking away the fast bus from Tooele county will ensure the loss of more riders. I and many others who work down town won't be able to ride the bus if it is not a fast bus.</p> <p>The wait time will no longer be worth the bus fare and loss of work time. I can't afford to make my commute longer.</p> <p>One of the reasons I chose my house in Stansbury was because of the fast bus route being close to my house and knowing the schedule worked for me. This change will no longer work for me and I would not ride the bus at all and would cancel my pass.</p>
11	<p>I am opposed to the recommendations to discontinue route 454 and modify route 451. Both of these routes have been highly successful from a ridership perspective. Prior to the pandemic the fast bus service (451) was almost always full when it left the last stop in Tooele County heading into SLC. This was true of all the scheduled times in the morning. It was also true of all the buses returning in the afternoon and evening.</p> <p>The proposed changes will adversely affect the commute of hundreds of UTA users in Tooele County by significantly increasing their travel times. I for one, will no longer be able to use the bus service to and from Tooele County if the proposed changes go into effect. I suspect that this will be the case for many others who currently use the fast bus service of route 451.</p>



12	<p>To whom it may concern,</p> <p>I am writing to voice my concern over the proposed changes to route 451 of the Utah Transit Authority which currently serves as the “fast bus” between Tooele and downtown Salt Lake City. I ride this route regularly because of the wonderful service and convenience it provides. I catch the bus at the Benson Grist Mill in Stansbury Park and ride to the 51E North Temple stop in front of the Church Office Building for the Church of Jesus Christ of Latter-Day Saints. It takes roughly 35-40 minutes from stop to stop (about the same as if I drove myself) and delivers me right in front of my work location. I love it! The ride is quick, comfortable and convenient.</p> <p>With the proposed change, this ride would now include a much longer ride with many more stops and interruptions. North Temple is packed with traffic in the morning, has 18 stop lights from the airport to 51 East North Temple (based on the proposed map), and train traffic that causes interruptions along the way. This doesn’t even take into account the stop for the International Center which would add 4 more lights, additional stop and go traffic, and passenger pickup/drop off locations. Add in all the stops this route will make for passengers on North Temple, and I suspect this ride will double in time from Benson Gristmill to 51E North Temple. The convenience and comfort I currently experience will be completely lost and I will have zero incentive to continue to pay for and utilize UTA.</p> <p>The citizens of Tooele County who use this service could suffer significantly as a result of this change. Possible problems include:</p> <ol style="list-style-type: none"> 1. A lower usage of the UTA system by Tooele County residents 2. Crowded buses with no room to sit during rush hour 3. No ability to socially distance 4. More traffic on the streets as a result of people using personal vehicles to travel into Salt Lake and surrounding areas 5. Riders who do not have personal vehicles being forced to endure double the ride time they normally do (an disparate and unequal impact on the poor who don’t have other options) <p>Tooele County residents have very limited options and access to UTA – this will severely impact us more than any other group in your service area. I encourage you to reconsider this change and maintain the Tooele Fast Bus.</p>
13	<p>Please re-start the fast bus 354 Sandy U.</p>
14	<p>Please consider some direct to Alta express bus.</p>
15	<ol style="list-style-type: none"> 1. Prior to the 2018 changes, the route 454 averaged 20-25 passengers a single bus that started in Grantsville at 6:10 AM and left Salt Lake at 16:12. Those 2018 changes effecting the route 454 to five buses caused the ridership to fall and disperse the passengers. Although the majority of riders went from the 6:07 am to the 5:37 am bus. When Covid restrictions came in effect why were these times dismissed? 2. When the Covid Restrictions were lifted, I was told two different reasons why the 454 could not get a middle run. Those answers were because of funds and ridership. We had 10 buses in Tooele down to 7 with covid restrictions. So if it was monetary where was the funds from as the tax hike in 2018 voted in Tooele County going and not allowing an 8th bus? If it was ridership the popular times for the Grantsville Bus were not put into action and were completely ignored? 3. What is going to happen to the 454 after the Ski Service Season? If canceled. What steps are needed to save the 454.
16	<p>Since I've been told that the input was just a formality and the change to the 451 SLOW BUS is going to happen, when will the schedule be out so I know if I need to get up 1 hour or more earlier to make it to work on time? When I've tried to check the schedule, there isn't anything available that far out.I'll need this to determine if it is still worth riding the bus if it's going to make my commute so long that the value is no longer there.</p>

	<p>Thank you for offering the opportunity to give input on the proposed changes for route 451 servicing Tooele. I have been taking public transit for 30 years, 26 of which are from Tooele and the modified 451 route proposal appears to be a pending nightmare. I can see the potential of offering an international center stop, if the 454 is discontinued, but cannot fathom the efficacy of the North Temple entry into downtown SLC.</p> <p>In my experience of previously riding the original but now discontinued 453 route, those using the North Temple stops were almost exclusively LOCAL riders from SLC and NOT Tooele residents; this route merely delays the arrival of those the route was intended to service to their primary location. Due to the extensive delays created by this proposed route change, I can only see this as a disservice to the rapidly increasing population of Tooele County and its riders. The overwhelming majority of riders from Tooele are headed to downtown SLC to either work in the downtown area without transfer, catch Traxx or bus transfers headed up to University of Utah or catch Traxx transfers further south. Many UU and IHC Hospital shifts begin early and it has become increasingly difficult to meet these times via public transit from Tooele County. Adding the International Center will further complicate these transfers and the North Temple entry will absolutely prevent a shift beginning before 7:00, probably closer to 7:30</p> <p>Even if the North Temple entry to downtown is abandoned, I would rather catch the bus 10 minutes earlier than be yet another 20-30 minutes later for my health sciences shift.</p> <p>Please reconsider adjusting the route by eliminating the North Temple entry/exit and adjusting the beginning times of the "new" 451 FAST bus to Tooele. If this cannot be done, perhaps a 4:30 am bus from Tooele should be added.</p>
17	Thank-you!
18	<p>I would to know why you are taking away the benches away? I think it is a mistake that Uta is doing. You are going to louse a lot of senior'S that like to wait for the bus. Especially the stop at So. Temple and K street. I would like receive a email telling me why you are doing this.</p>
19	<p>For the 451, 454, and F522 proposals it would be helpful to know when new on demand services will begin. How much longer would it take to ride 451 with the new proposals? In the printed schedules for 451 it would be good to have destination timepoints, so you would not have to stop if you were early.</p> <p>For the 640 proposal, the biggest problem is transferring at Clearfield Station. Having to plan for four different transfer scenarios would be hard at just 60 minutes frequencies. I would like to see when other parts of the five year service plans will be implemented in Layton and Clearfield to give feedback on the interconnecting system. From where I live the transfer timing has always been tricky getting from the south end of Layton towards WSU-Davis.</p>
20	Please increase the frontrunner frequency! Very hard to rely on it when service only runs every hour.
21	Please bring back route 313
22	I'm wondering when the route 39 East Bound will be back on regular routing. This bus takes my youngest son within 2 blocks of his school.
23	<p>For the most part I am happy with UTA. My major complaint is something that UTA has little or no control over. The closing of bus stops for construction is a major inconvenience. In some cases it can even be dangerous for pedestrians. I wish that could somehow be addressed before construction cones go up and someone starts digging.</p> <p>My other issue is the lack of communication between UTA and MV Transportation. A complaint about MV to UTA is not passed on and acted on.</p> <p>I am grateful for the service that UTA provides and the courtesy of most of the drivers. Thank you ladies and gentlemen.</p>
24	<p>It would be helpful to me (and other commuters) to get to work easier if:</p> <ul style="list-style-type: none"> - trax ran about an hour later on weekdays to help workers with late shifts to get home late at night - trax ran every 15 minutes on weekends (or just more often than 30 mins) would be really helpful!

25	I am a full time student at Salt Lake Community College and i rely on the F522 bus route to get to and from school. Please do not discontinue this line without having an immediate replacememt.
26	<p>About the FrontRunner schedule. As a passenger who use it everyday. I really hope that the UTA will change the train schedule back to where it was before Covid which has the 5:15 am run from Provo which really convenient for all the passengers that has to come work in Salt Lake. I would be really happy and appreciate if UTA can do that. Also, like now the 4:08pm train from Salt Lake Central Station to Provo is really overloaded with passengers. Can you please add the 3:30 pm train from Salt lake Central or North Temple? The passengers barely can find a seat especially during the Covid that still spreading around. Every day when the train came arrived to the station. It always full and when it gets to Murray Station. We have to sit at least 2-3 passengers together. And that is really make me feel not safe for the ride. I have heard other passengers complain the same thing as me. If you could please listen to over voice. Please add the train for 5:15 am from Provo-Ogden and 3:30pm train from North Temple to Provo. We all as a passenger would be really happy with your service and will love and continue using the UTA Service.</p> <p>Thank you so much.</p>
27	With the proposed changes - how much longer will the 451 route be extended each day? The whole point of riding the fast bus is to not have so many extra stops including those on North Temple etc.
28	<p>No comment on these changes.</p> <p>I do have a comment that I would love to take the bus/UVX to work and back every day, but it doesn't leave my stop on West Center Street in Provo until 8:46--arriving at 9:45 at the earliest, so it doesn't work. Is an 8 am departure possible?</p> <p>Thanks.</p>
29	I am concerned about the added time of my commute with this change to route 451. I am a regular rider out of Tooele, and making extra stops each day will increase my stress level in accomplishing work and getting home at a reasonable time. It is limited enough trying to get back to Tooele taking the bus in each morning because there is not a regular return route during the middle of the day. So far I have really enjoyed the bus ride and timing is working out well, but this change may derail that. So, if you could address the schedule of this bus, what the added time for riding will be, and address the consistency of routes out to Tooele I would appreciate it. Thanks.
30	Extend Rt 612 up to 3500 N or beyond.
31	I would like bus service from downtown Salt Lake to SLC International on Route 451. For example, the 454 was the only way I could get to the airport the day of the earthquake in March 2020. The Trax was shut down until very late late in the afternoon and the 454 was the only public transportation running.
32	Years ago powder mountain closed at 430 necessitating the 674 to leave the mountain at 515. For many years now powder mountain has closed at 4:00 pm, the hour wait for the bus is long and I would love to return to ogden station for the 607 train. The number of times the bus arrived early at maybe 6:17 just missing the 607 but still necessitating the wait for me until the 707 train was more often than not. Scheduled to arrive at 627 and most routes are not that early but if the snow is clear and nobody is using the 674 to go to the train stop, which I never saw it used in the city, it ran early
33	is the driver shortage because of wage issues? We should address that. They have very challenging jobs.
34	<p>My proposed service change is to include a bus route from the front runner Woods Cross station to South Davis Rec Center in the mornings. Then in the afternoons, include a bus route from South Davis Rec Center to the Woods Cross front runner station.</p> <p>(There is an opposite route like this - F605, but it goes the wrong way.)</p>
35	You need to add a route that goes down California west of Bangerter. There are lots of people who would use the bus if you opened a route there. The postal service has an office near 4800 W and California.

36	<p>you say your facing shortages yet you wont re-hire ex drivers. i personally have had my cdl for 21 years. you are obviously not hiring quality drivers, you are looking for unskilled, entry level with no experience. meanwhile, those of us that are approaching 50 years old are discriminated against. or those that had somebody fire us 15 years ago. let me repeat FIFTEEN years ago. most of your admin haven't been in the workforce for 15years. you should really serve the public, not yourself</p>
37	PLEASE add more service to the 205 ROUTE, every 30 minutes is not enough.
38	I don't think basing a reduction on service on lack of ridership can at all be possible until you have service every 15 mins minimum. Snd service that runs less frequently than every 15 mins is forcing the ridership to use alternative methods to get ffrom point A to point B. I think you would have a goal to have as many professional people on the buses and trains as possible. When your frequency is 15 mins of less you attract only those who have no other option and then make their lives more difficult by reducing service. You have to take the financial risk to increase frequency not cut it. When you have busses and trains moving every 10 mins you will then be able to get a reliable amount of data to make informed decisions on which routes to minimize or cut. Before that you are only hurting the potential of UTA. And the live ability of Salt Lake Valley.
39	We should be increasing the amount of transportation up the canyons for ski season, not delaying the ski bus until December 12th.
40	I miss riding the 313 or 354 fast bus for my commute from Sandy to the University Hospital. When will these routes be reopened?
41	You have proposed that in December you are going to discontinue route 454 and have it absorbed by the 451 route. This is a extremely bad decision. If you discontinue the 454 route it will leave customers stranded. The extra stops that will be added to the 451 will make most of the riders including myself decrease or completely stop riding the bus. The 451 bus is the FAST bus, not the normal bus line. We are professionals who need to get to Salt Lake quickly. It takes about an hour for a normal 451 trip. If the two routes are combined, it will add to about two hours for a one way trip. Personally, I would have to catch the bus at 5 a.m. to get to work on time. If combined, this will be the end of the Tooele line!
42	I come to Utah for the winter on November 26,2021. The only way I have for getting up the mountain is the bus service. What do I do for 2 weeks? If the plan in the future is more buses is this what we will expect???
43	Why in the world would you be screwing the times on Saturday on one of the most relevant and important routes in Ogden, being the 640, and after we in ogden passed Prop 1 years ago so that this never happened the future. Also, Saturday was actually a day that I rode the 640 more given the 30 minute times were better than the weekly ones, though I ride it/use it during the week also. I can't but believe that there is a direct correlation between bus frequency and ridership here, seeing that the 612 and 603 have more riders but there's a reason that's so too, and not just that those routes service poorer areas or something, but I also believe good research on these factors is never done here nor vetted well at all.....not to mention all the too much focus on the BRT route which will in fact be worse than the 603 as far as the number stops it services, and your ridership is being killed this year simply because of all the crazy detours and wasteful extended construction projects that us riders can't even follow anymore---they've been too numerous and have screwed all us in countless ways this summer. Thusly, we all just kill our feet and ourselves walking to destinations anymore, since that FACT in itself has made the buses harder to access. Not to mention all the horrible gentrification that has made us all move around everywhere o'er the last 10 freaking years! Too much corruption in Ogden including the mayor/council with way not enough thought/planning put into the entire process here, including officials at UTA and "certain special folks" getting pork, legislative earmarks and kickbacks on too way extended construction projects!!
44	<p>Move sign at 4100 and Hopi Dr, stop # 135183.</p> <p>Put route's 47 and 41 back to 15 minutes please.</p>

45	<p>If I could make a suggestion, I was thinking a more frequent route between Lehi and Saratoga Springs like every 30 or 45 or 60 minutes. I know there's a route that only comes and goes in the morning and evening but an hourly or half hour route would be good. Especially for commuters people who live in Saratoga Springs and work in Lehi and vice versa or people who just want to visit the towns for a while. Also I think some routes could be added going west Center Street in Orem. Orem Boulevard going north. Would be nice to have a connection between Brigham City and Logan. Though I'm not sure Logan is in the area. Also a route going down Freedom in Provo from Cougar down to Provo Towne Center. One more thing something that could connect Herriman with the rest of Utah like an expansion of TRAX or even a route from a close by area.</p>
46	<p>Slight expansion on the 551.. seeing the buses only a handful of times each day isn't very promising for the winter months.. there is one stop that has both sides of the 217 stop there</p>
47	<p>The changes do not affect me. However, a change you made does and I was notified by email or otherwise of the change.</p> <p>I know ridership is down, but some of that may be because you have suspended some of their buses. I rode the 35Max to the Trax station everyday for years until COVID hit. Now things are gradually settling into the new normal. I would like to start taking the bus/trax again, however the only bus available to me is the 35. It has more stops and takes longer to get to the Trax, It adds 10-15 minutes to my already 40 minute commute in the morning and longer in the evening. When the 35MAX is brought back I will start riding again. I know that state is trying to promote clean air by asking people to take public transit, but when you take away express services that help the business people get downtown in a timely manner, that poses a problem.</p>
48	<p>Can you put route 54 back to every 15 minutes?</p>
49	<p>Please keep route 451 an express</p>
50	<p>It sucks the buses shouldn't are used to not ride the 640 but since I've been going back to work I have to use it more and I have to use other buses to and it's really ridiculous that the buses don't run out easily on Saturdays I would think they would cause everyone's are you think they work better 476 on Saturday 603 is OK on Saturday</p> <p>But I have to take three buses to get to work and a stick in an hour and a half to get to place it will take 15 minutes in the car I don't I know it's gonna take longer because I have to take a bus but that's ridiculous because I have to wait longer at the bus route they're not the times are so far apart from each other or you go from the 603 to the 640 I'm waiting 25 minutes and then I get from the 625 transfer it over to waiting for the 470 and I'm waiting another 1015 minutes or there's days where if that was the 640s late Because the 36 th st and wall there's supposed to be there the same time it's always ones laying you miss it it's really annoying and then Saturday it's even worse because most of us don't start until almost 8 o'clock in the morning at 6:03 doesn't start till after eight 625 starts at 7:40 645 after six after eight other people still have to get to work All this damn construction is a joke oh we don't care if you have to walk another block because we don't give a shit we're going to do whatever we wanna screw whatever whoever we have to to get what we want</p>
51	<p>Bring back the 2X route</p>
52	<p>I'd like to request an additional change: please expand bus route 200 to include Capitol Hill service on weekends in addition to its current weekday Capitol Hill service. Thank you.</p>
53	<p>First, THANK YOU for including the 6:52 a.m. service for the 472 from the Kaysville Park and Ride Lot. This works perfect for those of us on a schedule to be at the office by 7:30 a.m. Before the pandemic this bus was often standing-room only, and 80% to 90% of the passengers were employees of The Church of Jesus Christ of Latter-day Saints.</p> <p>Second, I would like to see you ADD one more service time for the 472 from SLC to Riverdale. Currently, there are just three options for the northbound commute:</p> <p>From N Temple and State St: 3:40 p.m., 4:10 p.m., and 5:10 p.m.</p> <p>This is a problem for many of us who are employees at The Church of Jesus Christ of Latter-day Saints because we get off work at 4:30 p.m. We would be so grateful if you would add the 4:38 p.m. run back into the schedule. I believe that if you did so, you would get a much larger ridership in both the mornings and the evenings.</p>

54	<p>I am providing input regarding the proposed merger of 454 to 451 service. In looking at drive times for 454 it appears that the 451 add-on route will result in approximately 25-35 additional minutes to the commute to and from Salt Lake and Tooele. The added on time will result in 451 riders not using the service in the future as an additional hour of commuting is unacceptable.</p> <p>Please leave 451 alone.</p>
55	<p>I'm opposed to the change in the 451 bus. Adding the extra areas and stops, will, in my estimation now make it over 1 hour to get to downtown SLC. I feel that having the express bus encourages people to ride the bus but when you add another 30 minutes to the ride, many will stop using the service all together. I accepted a job in SLC based on my ability to get to work in a reasonable time riding the UTA 451 bus. Coming home already adds 45 minutes to my time away from home but this will now make it well over a hour. I see diminishing return on using the bus. In the morning it means that I will now have to leave a hour earlier thus requiring me to get up that much earlier to get to work on time.</p> <p>I'm opposed to the change of the 451 bus route from express to "Well, we'll still get you there eventually" route.</p>
56	<p>I would still like to see earlier & more trips into & out of SLC. The old 453 schedule with the first bus at like 5am was great. I have to be at work by 6am & it worked great.</p>
57	<p>Good job on the changes in Tooele county! I have been worried about losing stops in the International center. Also the transfer between the 451 and 454 at Bensen Grist mill has been a pain and the stop times for the 454 has been awful. I think this change will also save you a lot of money as well.</p> <p>Well done!!!!!!!</p>
58	<p>Keep the 451 as a fast bus directly to downtown. It sounds like you are trying to get less riders out here! Most people go directly to Downtown. This will extend the time, especially going to the International Center. Bad idea!</p>
59	<p>I urge you to reconsider your proposed changes to the 451. I live in Tooele and work downtown (temporarily working from home due to covid). Taking the 451, with it's stops at the 2 park and rides in Tooele is about 20 minutes longer than if I drive - not optional but I do it to save money and to do my part for the environment. Your proposed changes will add 30 minutes (each way) to people going down town. I struggle with the existing 20 minutes extra each way. There is no way I (or just about anybody else working down town) will be willing to add an extra hour (30 minutes each way) to your commute. If you go ahead with the proposed change it will be only a matter of time (a year or two) before you discontinue all bus service from Tooele to downtown.</p>
60	<p>On the train each morning, train 5, I hear comments from passengers. One of the comments I hear quite often is, Why does F.R. Skip the 5 pm departure time?</p> <p>They have to rush or leave work early to catch the 4:30 pm, or they have to hang around for 1/2 hours to catch the 5:30 pm train. Half hour service starts at 3:30 and then skips the 5:00 pm time and returns to the half hour at 5:30.</p> <p>Thanks</p>
61	<p>Makes 240 go back to where it was instead of every hour make it 30 minutes on Saturdays again it was nicer that way and this is coming from somebody who takes UTA to work sometimes when it's really snowy outside</p>
62	<p>These specific changes do not directly affect me, but I would like to make a couple of suggestions.</p> <ol style="list-style-type: none"> 1. Please continue to provide route 3's connection from Fronrunner to Research Park in the mornings, and from Research Park to North Temple in the afternoons. I depend on these connections for my commute now that 473 doesn't really mesh well with the Fronrunner schedule anymore. 2. With the new connection in Layton of Gordon Avenue to Hwy 89, will more bus routes be making connections with Gordon Avenue? <p>My son commutes to Weber State U. on the bus, but he needs a ride to the nearest PNR. It would be wonderful if he could hop on a bus on Gordon Avenue in Layton and get to the PNR,whereupon a 455 could take him the rest of the way.</p>

	<p>Keep up the good work! Our family depends on UTA.</p>
63	<p>I'm a 15-year 451 express bus rider and don't want to add more time to my already very long commute. What is driving this change? If it is low ridership, you probably know it's due to COVID and the fact that many people who ride the 451 express buses are still working from home because their employers have not given the green light to come back to their places of business. I believe most employers will require that all employees be back fulltime within the next few months, so hang on, you don't need to make these changes. Given that premise, why are changes being made for a temporary imbalance of riders? The 451 express buses have had excellent ridership during "normal" times, i.e. pre-COVID. Adding additional stops to 451 will add additional time in what is already a long commute to downtown SLC. Many riders will stop taking the bus because of the longer route that appears to add an additional 15 to 20 minutes to get to downtown. There are not published times for the proposed route, can that be published so that we know more clearly what the time impact is? As you hopefully know, the freeway and highway going out of and coming into Tooele county is a tragic mess because of the thousands who have moved from SL Valley to Tooele Valley over the past 3 years. Lengthening the travel time will deter people from riding the bus and will further add to the traffic problems by putting more cars on the road, more pollution in the air and wasting more precious time of Tooele county commuters. Please reconsider keeping the express routes for 451 the same or at least keeping a few of the high traffic 451 riding times, i.e. 7am and 7:30am at the current routes, not adding additional stops. Please email me the proposed 451 route times so that I can decide if I'm going to continue my bus riding or not. Thanks!</p>
64	<p>I dont really have any comments as long as the front runner will still run from provo to ogden making stops in between and stop at the North temple Bridge then I am good also if they Trax will stop going on the way to the airport at north temple and stop at 1940 w north temple and then from 1940 w north temple back to north temple bridge then that will meet my satisfaction.</p>
65	<p>PLEASE DO NOT eliminate local service to Lake Point JCT (Saddleback bus stop). This is an area with a growing population! Some years ago UTA considered eliminating this stop. Local citizens organized to SAVE that service, and UTA listened! This group is now dormant. It can be REVIVED, depending on UTA's pending decision. There are also a number of businesses in the area & some workers depend on that bus stop. Thank you for your attention in this matter! NOTE: UTA moved that bus stop; did not eliminate it.</p>
66	<p>One thing I think would be worth doing would be to extend the service times of the 451 for both its trips into Tooele and into Salt Lake City so that passengers are able to go between the 2 locations both in the morning and there evening. I know for me, having only until 3:40 PM to get back to my home in Lake Point from Tooele severely hinders my ability to work, as I work in Tooele. And it would be nice to be able to go into Salt Lake and return home from it without fear of missing the leat bus at 5:18 PM.</p>
67	<p>The route 604. 4:12 p.m. to Roy at the Roy station. Needs to be moved to 4:16 p.m. to ensure the driver can pick up the passengers from the train that arrives at 4:15 p.m. to Provo to take them into Roy along 3500 West. It's starting to get cold and do not want to be walking in the bad weather over a mile home because the bus leaves at 4:12 and our train doesn't show up until 4:15. It's been very inconvenient these last few months since you changed it.</p>
68	<p>Route 640: It's hard to say. Are the destinations along 640 popular? If so, I would keep the route at every 30 minutes; otherwise, every 60 minutes is fine.</p> <p>Route 454: I would say do not discontinue. Instead, have 454's east end much sooner, at a 451 transfer point. If people in Grantsville want to get all the way to Salt Lake City, they can transfer at 451. But I wouldn't want them to have fewer options to head out of Grantsville.</p> <p>Route 451: I would be in favor of it taking over the long-distance portion of 454's service, and connecting it to 1940 W. North Temple.</p> <p>Route F522: I disagree; I think it should remain there, for now. I see why people wouldn't want it there, given its proximity to I-215, and the idea of UTA On Demand being more flexible. However, current Google Play reviews of the UTA On</p>

	Demand app are very negative, and I'm not sure people would want that experience. Keeping the F522 route might be a better option for now.
69	This isn't a comment on already proposed changes, but more a comment on service. I am short, and so I have had several buses pass right by me at a designated bus stop simply because a car was parked right in front of it so they couldn't see me. Would it be possible to make stops like that "no parking" spots? Thank you!
70	I wish ski bus service would start earlier than Dec. 10! That's going to be 3-4 weeks after the season starts!
71	Can you please add a new bus route that goes along. south distribution drive, W Ninigret Drive, Gladiola St, S 3230 W. It would be appreciated I work in that area. Thank you.
72	Please do not change the 451 route. I take this Fast Bus daily. Thanks.
73	Changes to the 451 and 454 bus will result in a loss of ridership. The users of the 451 bus are predominantly would be vehicle commuters that use the fast bus because it is fast... By reducing the efficiency for these riders they will, myself included, go back to driving into Salt lake City instead putting greater pressure on the I-80 corridor during rush hour. Slowing the proposed bus route down even further. Many of my "more experienced" coworkers stopped taking the Tooele bus line due to standing room only condition and the near hour it took to go just from Benson's Mills to state street. Since the fast bus was implemented many of them have starting looking at public transportation as a viable option again. Bottom line if this change goes through the 451 bus will no longer be able effective or viable transportation option for this community.
74	I think offering 454 on a more regular basis besides twice a day would be highly beneficial

Hello,

I will not be able to attend the October 20th Virtual Public Hearing, as I leave my workplace in Salt Lake's International Center at 6PM to catch the Route 551 bus. I exit the bus to catch the Traxx Green Line at 1940 W. N. Temple. I exit Traxx at N. Temple Bridge to catch the 7:02PM Frontrunner, north to Ogden Station. My arrival at Ogden Station is approx. 8PM. My car ride home to Pleasant View is approx. 15 minutes. If the Route 551 bus is not running on time, I miss the 7:02PM Frontrunner and need to wait on the platform for the 8:02 Frontrunner. I work 4, 10.5 hr days, so use UTA W-F and commute in my car on Saturdays.

Although I carry my phone with me at all times, I only have a Wifi connection while on the Frontrunner, which may or may not allow access to a Zoom meeting. Because of this, I will relay my comments and concerns via this portal.

As you read through this, please keep in mind that I have complained to UTA numerous times in 2021, concerning Bus Route 551. My many complaints were due to a multitude of driver and schedule inconsistencies. In my complaints, I voiced that I represented a group of riders (some with 1 or 2 transfers), who use Route 551 to commute to and from the International Center and surrounding businesses for work. Some of these businesses have both day and night shifts, to include Amazon. I was told that the issues with Route 551 would be addressed for the next change day-Nov. I do not see Route 551 listed. Route 551 has had major issues and complaints this year. I was told that it is an undesirable route, so regular seasoned drivers don't want to bid on it. That because of this, it is covered in part by Extra Board drivers. I'm told and have witnessed that the scheduled times are not efficient, therefore the drivers need to exceed the speed limits to try and stay on schedule. I've been told numerous times that my complaints have been filed. I was told that for the month of September Route 551 was 86% on time, which I find hard to believe due to the constant high speeds and tracking/app times often demonstrating otherwise. Again, I do not see Route 551 addressed in the proposed changes. I do see a proposal for Route 451 to include the International Center, as well as including service to Tooele. I see the Route change map proposal for Route 451 changes, but I don't see any time schedule changes.

Please consider the issues for Route 551 when proposing and making changes for Nov./Dec. 2021:

Will the riders from the International Center be able to make their connections to and from work without constant delays, due to driver and/or route time inconsistencies?

Will the riders from the International Center and surrounding businesses, be left to wait for UTA transportation and transfers in inclement weather for twenty minutes or more?

Will the riders from the International Center be exposed to dangerous public transportation commutes due to inexperience or new to route drivers and/or drivers trying to meet an unrealistic time schedule in inclement weather?

Keep in mind I address the issues of Route 551 from the International Center rider perspective, because that's where my experience lies. I may be the rider who takes the time to communicate, which believe me is time consuming and takes its toll on me, but I am only one of a much larger group of frustrated riders. If you are in doubt, check the complaints filed.

75 Covid has taken a toll on all of us, but we will be fired if we don't show up on time or don't give it all while at work.

76	<p>Your proposed changes to Routes 451/454 may be in the best interest of UTA, but they are definitely NOT in the best interest of your riders. In addition, your method of informing riders is ineffective and even misleading.</p> <p>Route 451 is a fast commuter bus between Tooele Valley and downtown Salt Lake City. Route 454 is not a fast commuter bus but a regular bus route. You say you are discontinuing Route 454 and changing route 451. In fact you are discontinuing the fast commuter route, diminishing the regular route, and switching the numbers.</p> <p>How much time and how many stops are being added to the new Route 451? If the time increase is more than 10-15 minutes, the bus is no longer an attractive commuting option for me. I do not ride the 454 because it does not meet my fast commuter needs. I will not ride the 451 if it does not meet my fast commuting needs.</p> <p>If your fast commuter route is not financially viable, be honest and say so. I can understand that. Just don't tweak the regular route and put your fast commuter route number on it.</p> <p>As for your communications and notices, they are inadequate. I think I may have noticed a little paper in one of the buses (not all of them) but it was posted too high and in too small a font to be legible for a seated passenger. Pausing to read a notice like that while boarding and debarking is frowned upon. I don't know if the paper I saw referred to this change or not. If my wife had not seen this change mentioned in a Facebook post, I would have been caught totally by surprise by the change.</p> <p>Please tell me how much time will be added to the new Route 451, and then I will decide whether or not to cancel my EcoPass.</p> <p>Thank you.</p>
77	<p>Will the 313 and 354 fast buses be returning to Sandy/UofU routes anytime soon now that employees have returned to campus? Or can we get better service to the Sandy TRAX stations?</p>
78	<p>What is the expected time from on end yo the other of this new route? I take the 451 bus daily to and from Salt Lake and the changes proposed, from what I can tell, would increase the time of the entire route. Personally I would prefer more busses running on the 451 and have increased coverage throughout the day than a change to the route that would extend the time of the commute</p>
79	<p>I take the 451 every day to work in salt lake. My only concern is that the new route will add significant time to my commute. Assuming it doesn't double my commute time, I don't have a problem with the new route.</p>
80	<p>Please do not eliminate route 454 or combine it into 451. The commute on the 451 to/from Tooele to/from Salt Lake is already long, adding the additional routes will make the commute LONGER. The F453 currently goes to 1940 W. North Temple, why not merge the 454 into the F453??</p> <p>There have already been too many changes to the routes from/to Tooele. Continuing changes, and longer commute time will only discourage people from taking public transportation. If this change does occur I will likely no longer take the bus either since it will take much longer to get home or to work.</p> <p>If this does occur than more time options need to be added to make up for the inconvenience. Such as add additional trips to and from starting at 7:30 am; 8:00 am; 8:30 am 9:00 am; 6:30 pm; 7:00 pm; 7:30 pm; 8:00 pm, etc.</p>

81	<p>If you feel the need to decrease service on any bus route, then that route wasn't implemented correctly. You are doing a study for mire transit options in Utah and Tooele counties, yet you are cutting a route to Grantsville, and aren't increasing service at all in Utah County. Grantsville and Tooele should be seeing all day service directly from Downtown Salt Lake City. You are also looking at extending FrontRunner to Payson, yet have failed to provide Santaquin with adequate all day bus service. Rather than decrease service on some key routes, you should be looking at what those underperforming routes could be serving, but don't. The F453 doesn't continue into downtown Salt Lake, nor does it go all the way into Tooele, which makes it inconvenient, and hard to use. The 630 could serve the Pleasant View station, since no other bus does, and it could also pick up business from Washington Boulevard, rather than going down Wall Avenue. Other routes have similar issues of not following seemingly obvious routes. I come from Brigham City, and know of several issues up there. The F638 doesn't run early or late enough to be useful, and since neither Brigham City route uses the old Park'n Ride lot at 200 S 800 W, it is hard for actual commuters to use the service. An actual express bus from Brigham City, from that lot to the Ogden Transit Center would be welcome for many people. The 630 could also take up the old 616 route through Pleasant View, and gain even more ridership, especially during peak hours. The 472 could be extended to the Ogden Intermodal center, and further assist commuters by giving faster access to Downtown Salt Lake than the current 473 can provide. The 640 is long enough to warrant splitting into two separate routes, or even serving as an express bus from Clearfield to the Ogden WSU campus. It would also be worth looking into a route that serves Redwood Road from West Jordan City Center TRAX down into Saratoga Springs and Eagle Mountain, then over into Lehi as an all-day service. The 455 should also run on weekends, as it serves many areas that don't see weekend service otherwise. You should also consider running UVX, 630, 821, and 831 on Sundays. Once again, these routes serve areas that otherwise don't see busses on Sundays. Living in Provo right now, it is already very difficult to get around on Sunday due to the lack of service. Many people in Box Elder County would also love to see Sunday Service to get around. Many people that I have met down here in Provo have said that they would love a Sunday service to Payson to visit family. You should also look at bringing back the 811, but extending that up to Salt Lake Central, and maybe down to Provo Central, 7 days a week, to make it easier to visit Salt Lake from Provo, or vice versa, easier on weekends. I shouldn't have to endure a three hour torture ride just to visit friends in Salt Lake on Sunday.</p> <p>All in all, you guys need to look at refining your routes instead of cutting service. Many changes could be made that would be welcome to the people that use your service.</p>
82	<p>Hi yeah, don't change the 454 and 451 in Tooele. Leave them.</p> <p>If anything, add a bus that goes to Salt Lake at around 7 or 8ish am (for people who don't want to drive) comes back after 3 hours repeat two more times then returns about 5 or 6ish pm. There are probably a lot of people who would do that. I have wanted to do that so I don't have to drive.</p>
83	<p>This in regards to the changes for routes 454/451. I ride the 451 bus on a regular basis, usually 2-3 times per week. I used to ride the 451 5 times a week, but changes to the route over the years have made it less convenient than it used to be. If this change goes through, I anticipate that I will ride only 1 time per week at most. The main reason for this is that the changes will add at least 20 minutes each way to the commute time, and I would rather pay for the gas to drive in than lose another 40 minutes of time each day. I personally feel that a better solution would be to leave 451 as it is now. Based on comments I heard on the bus from other riders I believe that these changes will lower ridership even further.</p>
84	<p>The Tooele, Grantsville buses suck already. You want to cancel the 454 instead of making it better. People would have to drive to the Benson Mill just to get to SLC. Make the buses out here in Tooele/Grantsville better not destroying what little transportation that you give us.</p>
85	<p>Explain to me the point of transfer stations if none of the buses wait for each other for people to transfer buses. Everyday I miss the bus at transfer station cause buses don't wait for each other. So what is the point of transfer stations.</p>

86	<p>In regards to the F522 shuttle, I and several other people I work with do require that shuttle to go to and from work daily. Another concern lies in the fact that a few of them have disabilities and may not be able to understand the new system put in place.</p> <p>Another major concern lies in the On Demand app itself. Namely the fact that at the time of writing this, has 1.8 out of 5 stars on the Google Play store. I trust I do not need to explain why that is a concern, but the criticisms about the app make me even more worried about losing the F522 than I did before. Namely, causing me to be late for work every day and getting fired from my job. I very much hope someone is taking those 1 stars into consideration along with my concerns.</p> <p>I was initially all for the new system, but now I am filled with worry about this.</p> <p>Please do not remove the F522 shuttle.</p>
87	<p>Moving the bus stops is so ridiculous.</p> <p>I don't see how this is going to help.</p> <p>How you expect the Handicap people to get on and the buses especially when some of the new stops aren't that great for getting off the bus. I can see myself getting on a bus when I have a cart with painting supplies from a art class I go to on Tuesday night and especially when it is dark outside.</p>
88	<p>I have held a premium UTA pass for nearly twenty years. I have so appreciate the convenience of the service and the opportunity to not have to drive to SLC each day. I believe the proposed changes will almost certainly cause me to discontinue as a UTA customer. I fully understand that your usage rates are probably hurting in a big way, but I believe this is a short-sided decision that will ultimately alienate one of the fastest growing counties in the state.</p>
89	<p>The changes to the 451 are bad for anyone that needs to make it downtown. These changes will make a bus ride that is already 40-50 mins over an hour. For a bus to travel all the way up North Temple during rush hour traffic will be a nightmare for riders who are getting on in downtown. For those that would be getting on near 600 South, I imagine that they may be on the bus for 90 mins to get into Tooele. Go ahead and serve the International Center but leave the bus exiting on 600 South. Those that need to get down North Temple can utilize Trax. Has there been a study done on how many people from Tooele Valley get off on North Temple? I bet most riders are going to downtown, let them be the priority with a faster ride.</p>
90	<p>Please do not change the 451 for Tooele, This would make my husband have to go to work 1/2 hour earlier to then take 1/2 hour AT LEAST longer to get to work on time. This is ridiculous. There are so many people who ride this 451 Express Bus because it is an express. If you need to add the International Center then there needs to be a different option for those, maybe not offered as often. Please keep the 451 the same for the Tooele people who ride the bus every single day.</p>
91	<p>Please do not merge 454 with 451. Have the 454 people join the 451 route. The unpopularity of 454 should not punish the 451 riders. If anything, that will improve the success of 451. You are hurting the most popular route. (451)</p> <p>Another option, Keep both routes, but only have one bus for 454 so they can keep their schedule as well.</p> <p>You are making commute times much longer by adding a second route. I may consider dropping my bus pass if this ends up happening.</p>
92	<p>The proposed changes to 451 would render it useless for my commuting purposes. Currently my commute is an hour each way because I have to transfer to another bus, but if the route changes to include stops along north temple I am worried it will add another hour or more to my daily commute time which is already longer than I would like. The changes would make it unlikely that I could feasibly use the bus (especially given the already limited service of 451 in the morning and evening, assuming that stays the same) and I would have to drive. I recently moved to Tooele county because of how easy and convenient the commute to salt lake would be with the 451 fast bus, but if it is slowed down I will have to be another commuter driving a car with one person in it, clogging up the highways and contributing to the winter smog. I am just not going to spend 3 or more hours a day on a bus, it is not worth my time.</p>

93	Route 451 - extending the service to the international center defeats the purpose of a fast bus. This will recreate a longer commute to and from Tooele/ Stansbury. If you move forward you will be forcing most riders to choose to drive and defeat the purpose of the option of a bus in Tooele County. Please reconsider this change. I am sure the pandemic has hit hard, but once we come out of it numbers should increase again. Thank you. Kimberly
94	Modifying the 451 route to go to the International center, the airport, and taking North Temple to State Street will add 30 minutes for 451 riders. I take the 451 daily and connect with either the Red Line, or the 473 bus to take me to Primary Children's Hospital. Prior to Covid I would sometimes choose to take the 454 into Salt Lake because the 451 got to be too crowded, to the point that people had to ride standing at times. It was nice to have more space, but this added at least a 30 minutes to my commute so it was less than ideal. Making this longer route the only option for 451 riders (which there are many more of compared to 454 riders) would surely decrease the amount of riders using UTA to commute to and back from Salt Lake. I am not sure if it personally would be worth it to me except maybe on snowy days. I can drive to work in 40 minutes. After this change it would take me at least 1.5 hours to get to work between the modified 451 route and my connection to get to Primary Children's. Please consider other options, like for example, reducing the frequency of 451 buses going out. I have at times taken the earlier buses to get to work earlier and there are not many people taking those. Or maybe discontinuing the 7:30 451, which has only been running for a short time. I am happy to talk over the phone if it would be helpful.
95	I think you could consider extending bus service up the ski canyons to include mid day service. I also think express busses will entice more people to ride the bus as it will shorten the bus time, especially for the folks going all the way up the canyons (Alta and Brighton). Unfortunately, most of the time, especially during "rush hour", the bus is full before it picks up on Wasach Blvd. (swamp lot). This is a great discouragement for bus riding. The bus might be very useful this year as Alta and Snowbird are both requiring parking reservations this year on weekends.
96	Hi,my comments for ski buses for little cotton canyon are as follows . (UTA should consider express bus service) Add some alta only and snowbird only bus service during the busy times...Example,Its hard to get on the bus at snowbird waiting to go down the canyon after the bus has picked up riders from alta.Some times the (bus is full) . Express buses up or down the canyon would also make it a shorter trip.Alta up only could reduce travel time by 20 to 25 min.Snowbird down only would save bus drivers driving time also. Some people who may not use the service now might use the buses because the Travel time would be shortened. Would this make it possible to provide more frequent service if each route was shortened? Parking limitations at the ski areas should cause more people to consider the ski bus, especially if the services are enhanced(more frequent and or... faster service by having express bus service) The ski areas are causing such congestion with so much more traffic that it would help with more funding from them so we could get more frequent buses to go up and down the canyons. Thank You.
97	The 454 bus route is very important!! Many people depend on this route to get to the airport! Also, some cannot get up to the other bus stops in Stansbury!! Keep the 454 route!!!!!!! Please!!!!!!!!!!
98	Pertaining to the 451 route, with the proposed additional stops, I don't see taking the bus will be a viable option for me. The current fast bus route takes me approximately 35 minutes. It will not be convenient to take additional time to get to my same destination (300 S and Stare St). If the new route adds too much bus time, I will not continue to use the bus service.
99	The proposed changes to Route 451 are a huge step backward for bus service between Tooele County and Downtown Salt Lake City. I feel like you are abandoning the Fast Bus/Express Bus program for Tooele County entirely. This proposed change will impact me more negatively than any change that has been implemented since I first started riding the bus to Salt Lake City every day over 7 years ago. I figure the proposed changes will add at least 30 minutes to my round-trip commute. I understand that you can't justify running near empty buses. I'm just frustrated with the situation. These buses were mostly full before the pandemic. Where did everyone go?! Couldn't you run smaller Express/Fast buses instead? The changes will be detrimental to both my family life and my work life. I just wish the Fast Bus program for Tooele County could continue.

	<p>The customer would like to give his feedback about two of the proposed changes for this upcoming change day.</p> <p>Getting rid of route 454 is not a good idea at all because it pretty much completely isolates people in the Grantsville area. If UTA is going to get rid of that route, they should replace it with something else.</p> <p>The F522 also should not be discontinued at all either because some people might use it to get to one of the SLCC campuses in the west. If any college students use that route to get to school there walk from the bus stop will go from less than 10 minutes to almost a half hour.</p>
100	The customer does not use either of these routes but has been thinking about them a lot
101	The caller would like to offer feedback that the proposed discontinuation of route F522 will cause him major issues and a walk time of about an hour trying to get to the SLCC West Pointe campus from Redwood Road.
	<p>The customer would like to leave some feedback about the proposed changes to route 451 for this upcoming change day. Basically, he is not a fan at all. The customer lives in Grantsville and works for the church and commutes 3 times a week. He has been taking the bus from Grantsville to SLC for about the last 16 years and has a lot of experience with the bus.</p> <p>The proposed changes to the 451 will add a significant enough amount of time that it will no longer be worth it for the customer to ride. Overall the changes will change his desire to use UTA, but several other people he knows who are in the same situation. These people have the choice to drive or to ride the bus, and they choose to ride the bus, but the minute it stops being advantageous they will stop riding the bus.</p>
102	If anyone is interested he has several ideas on how to improve the service in a way that will benefit everyone; riders and UTA.
103	The customer is requesting that we keep the F522. F522 is set to discontinued.
104	The customer would like to leave feedback on the proposed changes to route 640. The 640 services are such a large area, and there are so many people that rely on it that reducing its frequency on the weekends will have a negative impact on many people.
105	The customer called to submit a request for the December 2021 change day. The customer states it would be nice to have the route 54, returned to 15 minutes intervals for service.
106	Your current changes to the Tooele and Grantsville routes throw my schedule off completely. The changes over the last few years put me at work later and later. I will be not able to use your service any longer. Thanks.
107	Customer feels that the Tooele buses need to run later to head back into Tooele. There are people who need to get back to Tooele later in the day and would need the bus. It would be nice to have a trip closer to 19:00 or even later if possible.
	<p>The customer is concerned with the proposed changes for Rt 451 to Downtown an unhappy.</p> <p>The caller states all the folks that use this Rt 451 are professionals/ business people and it will be an extreme inconvenience with the new proposed changes.</p> <p>It will take longer to get into work and arrive home later. The ridership will definitely drop off and will be go back to their cars.</p> <p>They want it to be like the Rt 454 & 453 which makes are trip longer. They could add a few more stops but no major change.</p>
108	
	<p>The customer is calling to say that he is not a fan of the proposed changes to the 454 and 451 buses for the upcoming change day. He says that if the change to the 451 goes through that he, and several other people he knows, will probably choose to drive instead of taking the bus.</p> <p>If UTA wants to reduce pollution and service communities like Tooele, then this change is pretty much going in the complete opposite direction.</p>
109	

110	<p>Please don't make a change. What we have now is ideal. That downtown stops are optimal because we can transfer to Trax and other buses easily to continue to our final destinations. Not all of us work in downtown Salt Lake. I know some people that need to transfer to bus 200, TRAX, etc to go to different destinations. Also, I believe that there are fewer people that use bus 454 than 451 routes. Before the pandemic 451 was always full and 454 was not even close. Many of us still work from home, but some or many of us will eventually come back to office at least a few times a week when everything is getting back to normal. A lot of us work in downtown (around the state street, University Hospital, and Primary Children's Hospital. We already have had very limited public transportation options with no TRAX and Train. Now, you will take away to only option we can go to SLC with reasonable time. With the proposed change, our commute time will increase dramatically and it is not going to be visible to ride the bus anymore. The response that I received said the commute time would increase 5-8 minutes, it is completely false. Lastly, perhaps reducing the frequency is a better option than eliminating entirety of the fast bus. To conclude, WE are all encouraged to drive LESS and to take public transportation. However, with this proposed change, we WILL drive MORE to SLC. It is NOT helping and making our air quality WORSE.</p>
111	<p>I ride the 451 from Stansbury to 50 North Temple each weekday. This takes about an hour each direction. If I drive it on my own it takes about 30-35 minutes. So it is already almost double the time, but the added time is worth the value. However, modifying the 451 to go through the airport and on North temple will add a significant amount of time I would estimate 25 minutes. Adding almost a half an hour increases the opportunity cost too much for me. Adding approximately 45-50 more minutes each direction, each day, is too much and I will have to drive myself. I know of many other riders that also ride to 50 north temple and their feelings are similar. I also know a handful of passengers who ride the 451 to catch other downtown buses to go to the U of U hospital by the U of U campus. They already have an 80 or more minute commute. Adding an additional 25 minutes would greatly impact their already very long commute. Please DO NOT alter the 451 route. I know of others who ride to 50 north temple from other locations around the valley and they have buses and trains that run every 15 minutes. The 451 is already very limited in its options and available times (only one direct route and only every 30 minutes). Can another route be pushed to every 20 minutes without disturbing where the other route goes so we can maintain our route? We have very limited options from Tooele already, please don't change route 451.</p>
112	<p>Changes are tough, but I agree with them. Best thing for the resources you have. Unfortunate for Grantsville riders, but changes to 451 are the best for everyone. Not going to add that much time and will be a good thing.</p>
113	<p>Don't make the 451 slower and inconvenient. You will lose the riders you do have.</p>
114	<p>I would like to recommend that bus route 200 increase service to circulate Capitol Hill on weekends in addition to its current weekday Capitol service. Thank you.</p>
115	<p>Would love to hear how the proposed bus changes to the international center affect the schedule. Often the bus arrived at odd hours and didn't link well with the Trax schedule. Will the change be to accommodate more times for those working and commuting out to the international center? Is there a spot to see more details about the changes?</p>
116	<p>I want to hear about Ride time increase, frequency of route, and impact on schedule for this change to route 451. As a regular rider I am concerned. appreciate shortage of staff, concern about travel times, enjoy taking bus from Tooele, I hope that as ridership increases routes could be added again</p>

Appendix 5 – Response to Feedback on Major Changes

Route 451 / 454 consolidation

- Consolidating the 451 and 454 allows UTA to optimize resources including labor, to preserve more productive services throughout the service area and focus on creating an interconnected network of services between the Tooele Valley and Salt Lake Valley.
- Additionally, the consolidation of the 454 and 451 makes it so that the service provided to Tooele County is in line with what is warranted based on propensity and performance.
- Based on public input, 451 routing will be adjusted to start and end at Courthouse Station.

Route 451 Travel Time impacts

- Much of the opposing feedback to the proposal was focused around the increased travel time added to 451 by having it deviate into the international center and serve along North Temple. As per the schedule developed by UTA operations planning after real-time testing by the team, the added travel time will be 2 to 10 minutes depending on the direction and time of travel.
- UTA will be monitoring the travel times and ridership to evaluate if any adjustments are needed in the future.

Route 454 Discontinuation

- UTA will discontinue service due to the lack of ridership on the segment between Grantsville and Benson Grist Mill. 454 riders will be able to access a similar ride to SLC beginning at the Benson Grist Mill Park & Ride.

Route F522 Discontinuation

- UTA will discontinue the F522 because it will be replaced by UTA On-Demand service.
- UTA would like to help with the transition to this new service. Find out more about UTA On Demand at rideuta.com/OnDemand or call us at 801-RIDE-UTA.

Route 640 Headway Reductions

- UTA will be reducing the frequency on the route 640 on Saturdays from 30 Min headways to 60 min headways because of the low ridership and optimizing resources.

Alternative Options:

- Find out more about Vanpool services if your commute will be impacted by any of these changes. <https://www.rideuta.com/Services/Vanpool>



Low-Income Reduced Fares FAREPAY Card Engagement Report

Community Engagement Team

November 1, 2021

Contents

- Introduction 2
- Overview of Feedback Received and Recommendations 3
 - Language Barriers 3
 - Photo Requirement..... 3
 - Document Requirement and Uploads 4
 - How to Ride Information 5
 - Collaboration with Community Organizations 6
 - Paper Application Option..... 6
 - Types of ID Accepted 7
 - Address Verification..... 7
 - Reloading the Card..... 8
 - Price 8
 - Internal Awareness 8
- Engagement Efforts 9
 - On-System Events 9
 - Survey - Incomplete Applications 11
 - Discussion Groups..... 12
 - Personal Interviews..... 12
 - Meetings with Community Partners..... 12
 - Emails to Community Partners 14
- Follow-Up & Timeline 16
- Attachment #1 – Incomplete Application Results 17
- Attachment #2 – Discussion Groups Overview..... 23
- Attachment #3 – One-on-One Discussions 28



Introduction

In summer 2021, the UTA Fares team announced that people who federally qualify as low-income also qualify for a new pilot Reduced Fares FAREPAY card, which provides a 50% discount on all UTA services. A person who qualifies as low-income can complete an online application on the UTA website, receive and begin using their card within a few days. This program was previously available to youth, seniors, and persons with a disability. The low-income requirement allows a greater portion of our community to ride at this discounted rate.

The Community Engagement Team worked in tandem with the Fares team to gather feedback from the community and pass users about the program functionality and effectiveness. Several outreach initiatives were undertaken from August – October 2021. Various communities, service organizations, and individuals were consulted about their experiences with the pass. The methods used and data collected are outlined in the report below.

Included in this report:

1. Recommendations based on community input received.
2. A summary of the engagement and outreach work done, including on-system events, phone interviews/meetings, and discussion groups.
3. Detailed public feedback received about various aspects of the Low-Income Reduced Fares FAREPAY card.
4. A follow-up timeline, which includes suggestions of how the Fares and Community Engagement Teams can work together to report back to the public on feedback received and changes made. This accountability will allow us to build greater trust with our riders and encourage more people to apply for and use the Reduced Fares FAREPAY Card.

While several suggestions for improvement will be made based on feedback received, it should also be noted that many people and organizations had positive feedback about the program. They were happy with the fast turnaround in receiving their passes, the relative ease of the application process, and how this pass can ease the burden on our most underserved community members. We also received positive feedback about the kindness and helpfulness of UTA staff as they helped walk people through the program and issue their passes. As we work together to learn how to better serve these communities, it is important to remember the good work that has already been done by the Fares Team in creating and implementing this pass program.

Based on the feedback we gathered, our key recommendations include:

- Reducing language barriers.
- Revisiting the photo requirement.
- Simplifying document requirements.
- Including “How to Ride” information with the card.
- Collaborating with community organizations to qualify individuals for the card.
- Including a paper application option.
- Expanding the acceptable types of identification.
- Continuing with the change to the address verification requirement.
- Expanding the options to reload the card.



- Examining price options.
- Increasing internal awareness about the card.

This document includes an explanation of each recommendation, a summary of the engagement work completed, and attachments with complete feedback from each engagement activity.

Overview of Feedback Received and Recommendations

The engagement process provided consistent themes on program components that are working well, those that could be improved, and additional suggestions to improve each cardholder's experience. These recurring themes in the feedback provide a vision on how to increase ridership and equity, decrease barriers, and make the experience less bureaucratic and more accessible for all. These themes, along with a brief explanation of each and recommendations, are included below.

Language Barriers

At the start of the pilot, most of the Reduced Fares FAREPAY Card information was solely available in English, except for available Google Translate on the webpage. Flyers and website documents were translated into Spanish early in the pilot program. These are now available upon request and distributed at community events.

More Spanish accessibility was requested by individuals and community partners. This includes a fully translated Spanish application form available on the website, rather than relying on Google Translate. The Spanish-speaking population in the UTA service area represents 4.2% of the population, and members of this community are much more likely to ride and apply for services if the information is available in language.

Spanish is not the only language in which materials are needed. There is a large population of refugees in the UTA service area and many qualify for the Reduced Fare FARPEAY Card. They speak a variety of languages, including Somali, Arabic, Swahili, and Congolese. Refugee service providers expressed concern about digital access and digital anxiety with their clients, especially when information is not available in their native languages. Having the Reduced Fares information available in these languages would make it much easier for non-English speakers to apply for the pass and learn how to integrate public transportation into their lives.

Recommendations:

- Translate the application into Spanish and have it available on the website.
- Translate the website documents and flyers into Somali, Arabic, Swahili, Congolese, Vietnamese, and Navajo. Have these digital files available to print and distribute upon request.

Photo Requirement

The need for a photo on each Reduced Fares FAREPAY card was also an access barrier among potential users. The photo requirement presents challenges for several reasons:

- It requires an individual to have access to a camera and the ability to upload a photo onto their device.



- It requires an individual to have the time and means to travel to a UTA Customer Service location to have their photo taken.
- It delays the process of individuals being able to access the discount for which they qualify.
- It appeared to be a reason why people didn't complete the online application - several dropped off at the photo requirement.
- It could potentially cause difficulty in the ability for partnering organizations to automatically qualify individuals for the pass (more on this theme below.)
- The need for a photo can dissuade people, particularly those who are undocumented, from applying.

Additionally, photos are not required on all UTA passes. ECO passes and FAREPAY cards don't hold a photo requirement, for example. Both passes offer discounted fare on UTA, like the Reduced Fares FAREPAY card. While photos on the Reduced Fares FAREPAY card are required as a measure to prevent fraud, the inconsistent implementation of photos on UTA passes implies an inequitable assumption that low-income groups may attempt to defraud our system more than compared to other users. This assumption is harmful to the communities we serve and is ultimately preventing people who qualify for the card from receiving it and riding our system. Eliminating the photo requirement would ultimately increase equity in opportunity among our riders and community members. The need for a photo on a pass should be a consistent requirement across the board - either all riders need a photo on their pass or none of them do.

Recommendations:

- Remove the photo requirement from the Reduced Fares FAREPAY card application.
- Alternatively, UTA could assess a photo requirement for all passes.

Document Requirement and Uploads

The requirement to upload documents onto the online Reduced Fares application was a barrier for several people. This could be for one of several reasons:

- The website was malfunctioning.
- The individual doesn't have a device or sufficient internet connection to upload the documents on their own.
- The documents required were difficult to find or obtain, including 60 days of paystubs, previous year W-2s, or previous year tax returns.

The ability to qualify for the card based on participation in a DWS program or inclusion in the HMIS database was extremely helpful. However, community organization representatives and a few individuals expressed concern that for those who don't already participate in those programs, the required documents may be difficult to provide.

A person who may have difficulty providing these documents could be in one of the following situations, based on people we spoke with and "typical situations" of community partners' clients:



- They work odd jobs and don't receive a paystub.
- They are undocumented and unable to file taxes, receive a paystub, or apply to participate in government-funded programs.
- They work a job where 60 days of paystubs is difficult to obtain, such as a barista, waiter, or other service-industry professions.
- They are unable to apply for any government assistance or similar services without the help of a case manager because of lack of internet access, paperwork, or identifying documents.
- They recently moved here from a different country and are unable to obtain the needed documentation.
- They do have access to previous year taxes or W-2, but because of their limited device access, it takes them much longer than usual to receive that documentation.

Everyone's situation is unique and difficult in ways that others' may not be, and we recognize that it is impossible to address every situation when attempting to help people to qualify for the program. However, we do believe that there are actions we could take to help mitigate some of these common difficulties.

Recommendations:

- Provide a paper application at Customer Service locations or partnering community organizations for people without computer, phone, or internet access.
- In the place of paystubs or taxes, allow letters from previous employers who can verify a person's identity, how much they were paid working for them, and their understanding of the individual's financial situation.
- In the case of undocumented individuals, allow either another community organization, an employer, a landlord, or another entity to verify their identity.
- Require less than 60 days of paystubs.
- Provide the option to speak directly with our Fares team if they have extenuating or difficult circumstances that do not fit into the program requirements. This will give people more flexibility to qualify on a case-by-case basis.
- Re-assess application requirements to ensure they are precedented and necessary. Provide transparency around purpose of requirements for applicants.

How to Ride Information

In both discussion groups and conversations with community organizations, a theme arose that many people receiving the Reduced Fares FAREPAY card are either somewhat or totally unfamiliar with the UTA system.

This is a common problem in both maintaining and attracting new riders. However, there are things we can easily do to provide basic information to our new riders who are excited to utilize their pass.



Recommendations:

- Include a basic “How to Ride UTA” packet with the card when it is mailed or picked up. Work with Travel Training to develop this. Include basic information about how to use their Reduced Fares FAREPAY card.
- Have a link to the “How to Ride” YouTube videos included on the Reduced Fares page.

Collaboration with Community Organizations

While working with partnering community organizations, it became clear that in many cases, employees and caseworkers are well-equipped to help clients apply for the pass, particularly when individuals face barriers to applying. Additionally, many organizations work with people who qualify as low-income, including housing, refugee, immigration, and homelessness services. They know for certain that the people they work with technically qualify for this program, but many of these individuals are unable to apply on their own. This prevents them from accessing the pass and discount for which they would otherwise qualify.

In the best-case scenario, an organization could verify the identity and income status of an individual they work with to automatically qualify them for the pass. This automatic approval through a community partner would allow UTA to forgo individual applications and reach many people who qualify for the pass but are unable to apply for it. With this alternative verification, we would be empowering organizations to provide better services for their clients and giving more people the option to ride. This idea has appeared a few times during the engagement process and is something that we will soon be exploring with a few partnering agencies, including Housing Connect.

Recommendations:

- Develop a program where organizations can apply to automatically qualify the people they work with for the Low-Income Reduced Fares FAREPAY Card.

Paper Application Option

Most of the people we spoke with during the engagement process had few to no problems with the online application, but by nature of the Zoom meeting discussion groups, we know that these people are among those who have adequate internet access, digital confidence, and device capability. They can access the internet with relative ease, which naturally made the online application easier to access.

However, many people who qualify as low-income do not have the same level of device or internet capability as those who attended our discussion groups. To navigate and communicate with bureaucratic systems, they are usually supported through case workers and organizational representatives. We spoke with these representatives at length during the engagement process, and several indicated that a paper application could be helpful for their clients due to limited internet access and the digital divide.

Paper applications could be available at Customer Service locations or through partnering organizations.

Recommendations:



- Create a paper application in English, Spanish, and languages recommended by refugee service agencies.
- Provide these applications at Customer Service locations and partnering organizations.

Types of ID Accepted

There was confusion over the types of identification accepted when applying for the pass. While working with the Fares team, we learned that several types of ID are accepted when people apply for the card. There were suggestions from partnering organizations for even more types of IDs to be accepted. This list will allow a greater diversity of people to receive the Reduced Fares FAREPAY card and discount, including people who don't have access to more traditional types of identification. This may include people who are undocumented, newly relocated from a different country, are experiencing homelessness, or are not old enough to have a driver's license.

Additionally, we learned in this process that the UTA Fares team does accept expired driver's licenses. This is an important practice to continue and standardize, as there are real barriers to having a current driver's license in many cases. A person who is experiencing homelessness, is without a permanent address, or has had their license revoked will have greater difficulty obtaining a current driver's license. This barrier prevents people from accessing employment and other services, which can keep them in the cycle of poverty¹. It's important that our riders understand that their expired driver's license will not keep them from accessing the Reduced Fares discount on the UTA system.

Recommendations:

- Accept more types of identification, including passports, employee IDs, access cards, Mexican Consulate IDs, IDs from other country's consulates, HMIS IDs, or bills.
- Continue to accept expired driver's licenses.
- Clearly communicate which types of ID are accepted on the website.

Address Verification

The requirement for address verification was difficult for several community members who applied for the pass. The requirement to upload a utility bill if a person's address doesn't match the application was difficult for many who are in a temporary housing situation or do not have a traditional housing situation. This was feedback we received from multiple people during the engagement process.

The Fares Team has already taken this feedback into consideration and removed the address verification requirement for the card. They will now accept the address provided on the application. If the card comes back in the mail, they will email the customer asking them to pick up their card at Customer Service.

Recommendations:

- Continue with the process of not requiring address verification.

¹ <https://www.theatlantic.com/business/archive/2016/06/no-drivers-license-no-job/486653/>



Reloading the Card

Several people we spoke with during the engagement process expressed confusion over how to reload the FAREPAY card or were hesitant to make payments online due to previous bad experiences. Many would prefer to pay by tapping the card rather than cash but are either unsure or wary of doing so.

This hesitation or confusion could be remedied by increased education over how to reload a card and allowing people to reload their cards at TVMs at FrontRunner or TRAX stations.

Recommendations:

- Include basic information on how to load your Reduced Fares FAREPAY card in the welcome packet along with the "How to Ride" information.
- Allow people to reload their cards at TVMs throughout the system.

Price

Most people we spoke with were very happy with the 50% discount on the UTA system. One woman said it doubled her transportation budget, so she was able to travel twice as much. The consensus is that this program is helping people in tremendous ways. The discount is not insignificant.

However, there are still people who qualify for this pass who would struggle to pay even the 50% fare. Some organizational representatives voiced the concern that this program would not work for their clients, as they don't have the funds to pay even the discounted rate. Even people who can pay for the pass and were satisfied with their experience said they would like to see it more heavily discounted.

Recommendations:

- Increase the low-income discount to 75% rather than 50%, in line with the Human Service Pass Program.
- Explore a sliding scale model or zero-fare for low-income riders.

Internal Awareness

There was concern expressed that some bus operators were not aware of the Reduced Fares FAREPAY card option and denied rides to card holders. One discussion group participant said that this has happened to him at least three times.

While it is frustrating when operators don't understand fare types, they can also be assets in distributing information about fares to their riders. At the on-system event in West Valley, we spoke with a few bus operators stopped by the table. They agreed to distribute information about the program on their bus and each took several flyers in both English and Spanish.

While many people heard about the pass via a Customer Service agent, there has also been a few reports of Customer Service agents being unaware of the details of the program. One discussion group participant replayed that she was on the phone for 45 minutes with one Customer Service agent with questions about the pass before she got disconnected. When she called back, she was able to get her questions answered with another agent in less than ten minutes. She was frustrated that the agents didn't share the same understanding of the information about the pass.



Recommendations:

- Distribute a reminder memo about the Reduced Fares FAREPAY card.
- Increase the internal awareness of this fare type by providing in-person direct communication for operators.
 - *Example:* Host open houses at bus garages to share information about this program and others.

Engagement Efforts

On-System Events

Four on-system events were held in September. Each Wednesday, the Community Engagement and Fares team visited a different station in the system to give out information, give people the opportunity to apply for the pass on a tablet with support, or answer any questions people had about the pass. Stations and time frames were selected based on factors of ridership, geographic equity, and prevalence of low-income community members living in the vicinity.

At each event, we distributed information about the Low-Income Reduced Fares FAREPAY card in both English and Spanish. Most people had not heard about the option, and we walked several people through the process of how to apply for the pass. We also had the option available for people to apply online while at the event. As a result, we discovered a few bugs in the process, which were subsequently addressed by the UTA IT Department.

- Wednesday, September 8
 - Central Pointe Station
 - 7:00 a.m. – 9:00 a.m.
 - ~50 people spoken too
 - ~50 flyers total distributed in both English and Spanish
 - 1 person attempted to apply for the pass at the booth and was unable to do so
 - Notes: This location is a good place to reach people from a diversity of backgrounds, income-levels and languages.



- Wednesday, September 15
 - Provo FrontRunner Station
 - 4:00 – 6:00 p.m.
 - ~20 people spoken too
 - ~50 flyers distributed total in English and Spanish
 - 2 people successfully applied for the pass
 - Notes: Provo FrontRunner Station is busy, but most people riding have a pass either from their university or workplace. We couldn't speak with many people for whom this pass would be a good option.
- Wednesday, September 22
 - West Valley Central Station
 - 7:00 a.m. – 9:00 a.m.
 - ~50 people spoken too
 - ~50-60 flyers distributed total in English and Spanish
 - Nobody attempted to apply for the pass
 - Notes: We spoke with several people who were interested in the pass and indicated that they would be able to apply online on their own. We also spoke with a few bus operators who agreed to pass out information on their bus.



- Wednesday, September 29
 - Ogden FrontRunner Station
 - 4:00 p.m. – 6:00 p.m.
 - ~20 people spoken too
 - ~50 flyers distributed total in English and Spanish
 - Nobody attempted to apply for the pass
 - Notes: Two people knew about the program and told us they were going to go home and apply.

Survey - Incomplete Applications

Of all the applicants for the Low-Income Reduced Fares, 61 people did not complete the application. To understand the barriers they faced in completing the application, we sent out a survey to the respondents. Each person to respond to the survey had the opportunity to win a \$50 VISA gift card.

10 people completed the survey. They responded to the following questions:

1. What was difficult about the application process for the pass?
 - a. Please explain your choices.
2. What would have made the application process easier?
3. What changes to the application process would you suggest?
4. Which of the following requirements made it difficult to apply, if any?
 - a. Please explain your choices
5. What circumstances made it difficult to apply, if any?
 - a. Please explain your choices
6. How did you learn about the Low-Income Reduced Fare FAREPAY Card?
7. What are the best ways for you to receive information about future UTA programs?
8. Is there anything else you'd like to share with us about your experience applying for the UTA Low-Income Reduced Fares FAREPAY Card?



A summary to these questions and answers can be found in Attachment #1 below.

Discussion Groups

The Community Engagement Team hosted two discussion groups with members comprised of people who applied for and received their Reduced Fares FAREPAY card, people who were unable to complete their application, and people from organizations who helped distribute the information to their clients. The invitation to participate in the discussion groups was sent to 178 people. 31 people responded with their date, time, and language preferences. Each were invited to participate in one of two discussion groups, scheduled according to the survey responses. The invitation to participate was sent in both English and Spanish, and the survey was also available in both languages.

Each discussion group participant received a \$20 VISA or Amazon gift card, either virtually or mailed to their home.

One member of the Community Engagement Team facilitated each discussion group and asked the following questions:

1. What was difficult about the application process?
2. What changes could be made to the application process?
3. What specific questions or requirements made it difficult for you to apply?
4. What would have made the process easier?
5. What low-income requirements made it difficult for you to apply?
6. What requirement changes would you like to see made?
7. What would make it easier for you to access this pass?
8. What circumstances in your life made it difficult to apply for and obtain this pass?
9. How did you find out about this pass?
10. For future UTA initiatives, what are good ways for you to receive information?
11. Is social media effective for you, and are there other ways you prefer to get your information?

A summary to these questions and answers can be found in Attachment #2 below.

Personal Interviews

Of the 31 people who applied to participate in the UTA Discussion Groups, two indicated they were unable to make it to the proposed times. They instead participated in a one-on-one conversation with a representative from the Community Engagement Team. They were asked the same questions as the Discussion Group members in these personal interviews. Their detailed responses can be found in Attachment #3 below.

Meetings with Community Partners

In addition to speaking with individuals about their experiences applying for the Reduced Fares FAREPAY Card, members of the Community Engagement Team also met with twelve community partners to speak to them about their experiences helping their clients apply for the pass, any barriers they experienced or can foresee, and ways that UTA can make the application process and the pass itself more equitable and accessible for people who qualify as low-income. A few of these meetings were simply information sharing, but several organizations had suggestions for improvement. The suggestions we received are included below, along with the organizations who made the requests.



- Family Support Services
 - Their clients here already provide low-income documentation, so they should be set up to receive the pass automatically.
 - Their clients struggle with digital barriers. They mostly have government-issued cell phones, which have limitations in accessibility.
 - The organization has computer labs set up and caseworkers who can walk their clients through the application process.
- First Step House
 - They are Human Services partners and see the Reduced Fares FAREPAY card as a good supplement to that program.
 - Many of their clients either haven't worked in the past year or don't have access to the documents required for proof of income. This presents a barrier for many of their clients.
 - They would like it to be easy to replace the cards after they are lost and see information included about that as people receive their cards.
- Boys and Girls Club
 - They would like to see the online application available in English and Spanish.
 - It's difficult for immigrant families to apply due to language barriers.
- Comunidades Unidas
 - They also had the suggestion to make the online application available in English and Spanish.
 - Digital access is difficult for their communities.
- Women of the World
 - Their clients experience digital anxiety. It has less to do with accessibility issues and more to do with the difficult of applying for services online due to language and cultural barriers. A paper application would be preferable for many of their clients.
 - They serve refugee women who would benefit from having materials available in several languages. He specifically mentioned Somali, Arabic, Swahili, and Congolese.
- Asian Association of Utah
 - We need a process in place for undocumented works who don't have access to the required documentation.
 - Their clients face digital barriers as well, but the biggest barrier is that of documentation.
 - They suggested that UTA develop a system where another agency can automatically qualify someone they are working with for the Reduced Fares card.
- Rescue Salt Lake
 - The expressed that without caseworkers, it would be nearly impossible for their clients to apply on their own.
 - Most of the clients have access to a smart phone, but it would be difficult to apply for the program on their phones due to digital accessibility.
- Utah Division of Multicultural Affairs
 - They suggested having a link to the Reduced Fares page on other pages of our website so that it is easier to find.



- They suggested accepting different types of IDs for the identification requirement. They specifically mentioned passports, employee IDs, access, cards, Mexican Consulate Ids, or bills. This would specifically be helpful to immigrants and undocumented persons.
- They also suggested having a paper option to make it more accessible.
- They expressed concern over the photo option. Photos make it more difficult for the undocumented community to ride due to anxiety over being tracked.
- Multicultural Counseling Center
 - They suggested that UTA create a Spanish version of the application on the website.
 - They would like to see a part of the application that allows a parent to apply based on their child's Medicaid status. Many parents are undocumented, which means their children qualify for programs while they do not. If we could base their qualification on a child's eligibility for government programs, that would open it up for more people to apply.
 - They also asked that we send out reminder texts or emails when an individual's renewal date is approaching.
- The Roadhome
 - They would like to see expired IDs accepted, as well as HMIS IDs, which they offer to their clients.
 - All their clients use the HMIS database.
- Utah Refugee Center
 - Their refugee clients struggle with language barriers in accessing this and other programs.
 - They expressed that this discount may still be too expensive for their clients. They need free transit options
 - Applying online is difficult for their clients. They would like to have UTA representatives come in the future and help people apply.
- Internal Partners
 - Make getting a FAREPAY card an automatic part of the DWS application process

Emails to Community Partners

The Community Engagement Team initially contacted community partners through email with information about the pass and an invitation to connect virtually and discuss the details. Emails were sent to 85 community organization in the UTA service area, including:

- | | | |
|--|---------------------------------|---|
| ● 4th Street Clinic | ● Center for Independent Living | ● Comunidades Unidas |
| ● AUCH Community Health Centers | ● Ability First Utah | ● Crossroads Urban Center |
| ● Bountiful Community Food Pantry | ● ChamberWest | ● DHS |
| ● Boys & Girls Club of Greater Salt Lake | ● Chamber of Commerce | ● Division of Child and Family Services |
| ● Catholic Community Services | ● Columbus Serves | ● Downtown Alliance |
| | ● Community Action Program | ● DSD |
| | | ● DWS & HMIS |



- Family Support Services - Taylorsville
- First Step House
- Food Sense and Snap-Ed
- Guadalupe School
- Halfway House
- Haven Helps
- Headstart Program
- Health Access Project
- Holy Cross Ministries
- Homeless Housing Assistance Center - YCC Family Crisis Center
- Housing Authority of Salt Lake
- International Rescue Committee
- Latino Behavioral Health
- Maliheh Free Clinic
- Maliheh Free Clinic
- Mckay Dee Hospital
- Midvale Community Building Community
- Midvalley Clinic
- Multicultural Counseling Center
- National Alliance on Mental Illness (NAMI)
- Nonprofit Legal Services
- Odyssey House
- Odyssey House
- OgdenCAN
- Refugee & Immigrant Center
- Refugee Education and Training Center
- Rescue Mission of SLC
- Sacred Health Clinic
- Salt Lake County Aging and Adult Services
- Salt Lake County Health Department Asthma Program
- Salt Lake Donated Dental Services Clinic
- South Valley Services
- SSVF Outreach
- State Refugee Office
- Synergy Family Services
- The Other Side Village
- The Road Home
- UDOH Oral Health Program
- United Way Utah County
- United Way,211
- University of Utah Health
- UT Courts
- Utah Asthma Program
- Utah Coalition Against Sexual Assault
- Utah Community Action
- Utah Department of Health - Living Well Program
- Utah Department of Health - Violence & Injury Prevention
- Utah Dispute Resolution
- Utah Division of Multicultural Affairs
- Utah Domestic Violence Coalition
- Utah Food Bank
- Utah Food Bank Mobile Truck
- Utah Food Pantries
- Utah Health and Human Rights
- Utah Hope Clinic
- Utah Legal Services
- Utah Non-Profit Housing Corporation
- Utah Refugee Center
- Utahns Against Hunger
- Utah's One Roadmap
- Valley Behavioral Health
- Ventanilla de Salud at the Mexican Consulate
- VOAUT
- Wasatch Behavioral Health
- Way to Quit / Dejele Ya
- Women of the World
- YWCA



Follow-Up & Timeline

The Low-Income Reduced Fare FAREPAY Card Program will go before the UTA Board of Trustees in December 2021. Pending Board approval, the program will become permanent at UTA in 2022. Once this program moves beyond pilot phase, there will be need for the UTA Fares and Community Engagement Teams to report back to the public with our findings and what we have done to be responsive in making needed and appropriate changes that create an even better product for the community. All changes to the program should be implemented with the goal of increasing equity and access, reflecting public feedback, and giving a greater number of people the opportunity to qualify for the pass and ride our system, in turn increasing ridership and revenue.

After the program is made permanent, we will need to continue the feedback loop. Updates and report-backs on the data gathered and changes made will be sent to community organizations, discussion group participants, and other card holders. This will be done through a link to the report online, infographics, and individual emails to discussion group participants. The option to report back about the program on social media is available, as well.

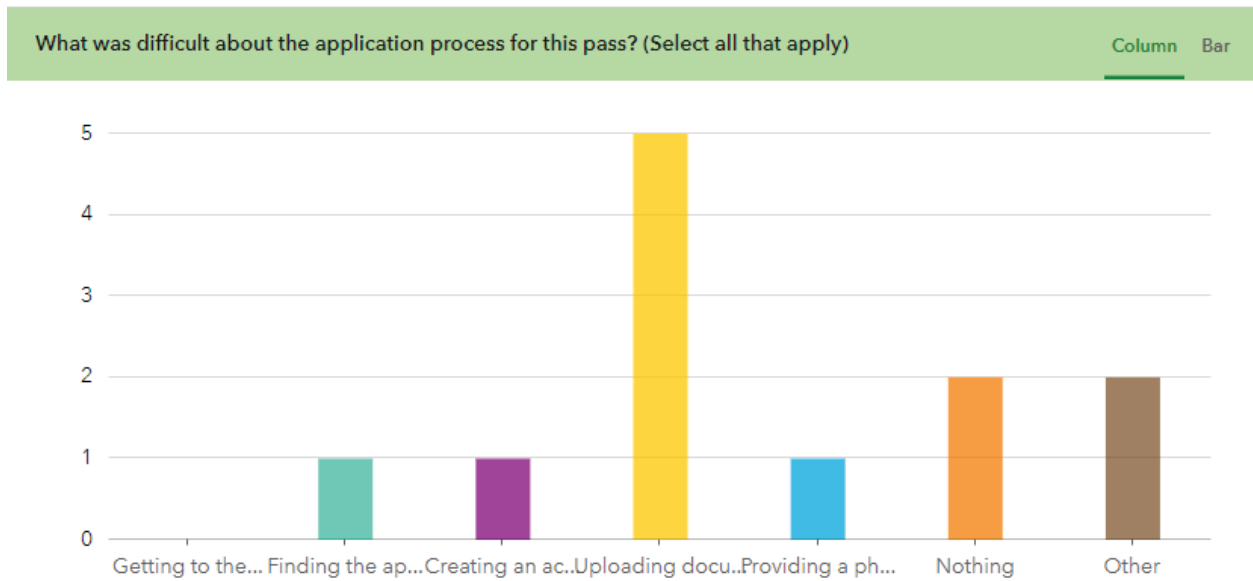
As we complete this feedback loop, we will likely receive more suggestions from the public on how we can further improve the program. As possible, the Fares and Community Engagement Teams can continue to implement needed and appropriate changes to the program. Any additional changes will help us as we continue with our goals to increase ridership and equity on transit.



Attachment #1 – Incomplete Application Results

The following are the responses to each question of the survey:

1. What was difficult about the application process for this pass?
 - a. Uploading documents (5 selected)
 - b. Nothing (2 selected)
 - c. Finding the application landing page (1 selected)
 - d. Creating an account (1 selected)
 - e. Providing a photo (1 selected)



2. In the space provided, please explain your choice(s).
 - a. Unclear information
 - b. I tried 4 times to upload my driver’s license. It freezes up and won’t let you finish the application.
 - c. I always have a difficult time using my printer/scanner. I’ve never been to any of the places the sell the FareCards and it seems odd to pay to take the bus to a place I’ve never been and never will go again to then go home and pay more money so I can ride the bus next time with a card.



- d. I'm low income. I get SSI. That means I am disabled. I cannot pay out a huge sum of money to get a monthly pass—even at half price it's too much money to fork over when I might not travel every day to make the sacrifice worth it. I'm from the Atlanta Georgia area. The transit system has a program for handicapped individuals to get a reloadable card where they can put in a much lower amount of money for people like me to get around. Two years ago reduced fare was \$.95. Houston has a similar system, except disabled fare is \$.65. More affordable. Both programs require a physical visit to the transit systems headquarters to bring in a Social Security benefits letter. The smart chip in the cards have been programmed to get the discounted fares. Here it's ridiculous. Your program needs to change for low income people because if others have assets like mine then it's way too expensive. Fix this.
 - e. I completed my application and submitted all necessary documents all on the same day and even followed up with a phone call to see what happened with it as I never got any response back and still haven't. The lady I spoke to took my info and said she's call me back and I still haven't heard anything. As of now it would almost be pointless to have it because we will only be living in Murray for one more month and needed it months ago when I applied.
 - f. It would not let me upload any documents
3. What would have made the application process easier?
 - a. Take picture with phone directly on site
 - b. Provide clear information
 - c. Not Sure
 - d. It was working correctly. It was very frustrating as it kept freezing up
 - e. If it actually got process and we got the pass
 - f. I'm not worried about the application process. I object to the whole system.
 - g. Being able to upload.
 - h. Allowing me to purchase a FareRide Card on the website and just having me enter my EBT Card of Medicaid Card numbers.
 4. What changes to the application process would you suggest?
 - a. Letting me just purchase the pass at the transit station like the rest of the world.
 - b. Make it cheaper—the fares. Make it where fares can be put on a reloadable card and added one at a time or a group.
 - c. I don't understand why you are saying my application was incomplete and if it truly was why was I contacted via email or phone to get what you claim was still needed. Don't waste people's time if you can't even offer these passes. Families are struggling



and this was just more depression on my part than my husbands cancer has been alone.

- a. Being able to make the process alot easier
- b. Maybe have the entire application be electronic rather than a paper form sent out after applying online.

5. Which of the following requirements made it difficult to apply, if any?

- a. Proof of identification (4 selected)
- b. Proof of income (60 days of paystubs, previous year W-2, previous year taxes) (4 selected)
- c. Mailing or picking up your card (2 selected)
- d. None (2 selected)
- e. Photo requirement (1 selected)



6. In the space provided, please explain your choice(s).

- a. Why does it seem like you're asking me the same question every time? Just see my answers above!
- b. Bad system all together.
- c. I submitted a full and complete application with my lease agreement, drivers license and everything and never got a single response even after I personally made a follow

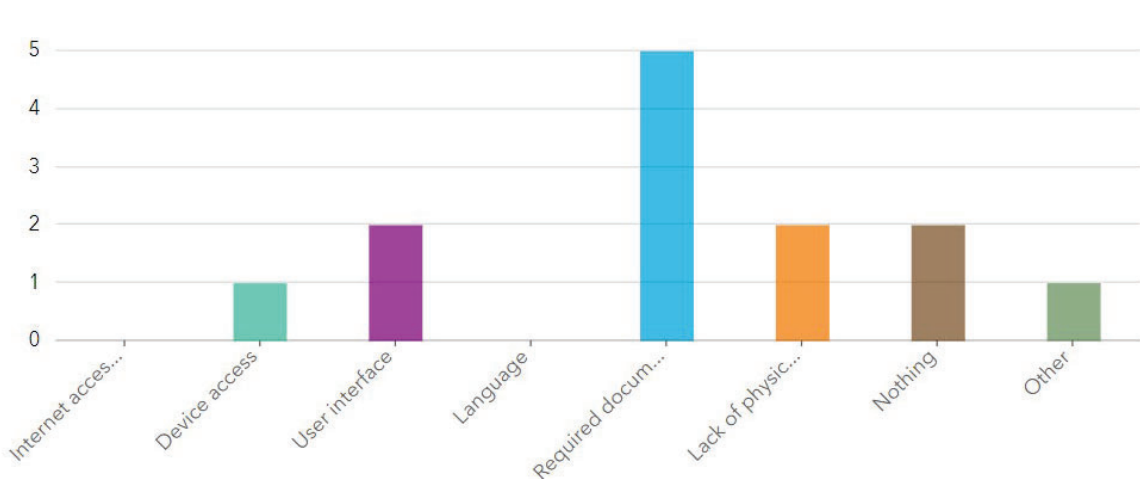


up phone call and was told I would get a call back to tell me why I haven't heard anything. It was a complete joke and waste of my time.

- d. I haven't filed my taxes or have paystubs
- e. I have been actively seeking work but have a difficult time due to criminal background. I have no proof of income.

7. What circumstances made it difficult to apply, if any?

- a. Required documents (4 selected)
- b. User interface (2 selected)
- c. Nothing (2 selected)
- d. Device access (1 selected)
- e. Lack of physical address to have the pass mailed (2 selected)
- f. Other (1 selected)



8. In the space provided, please explain your choice(s)

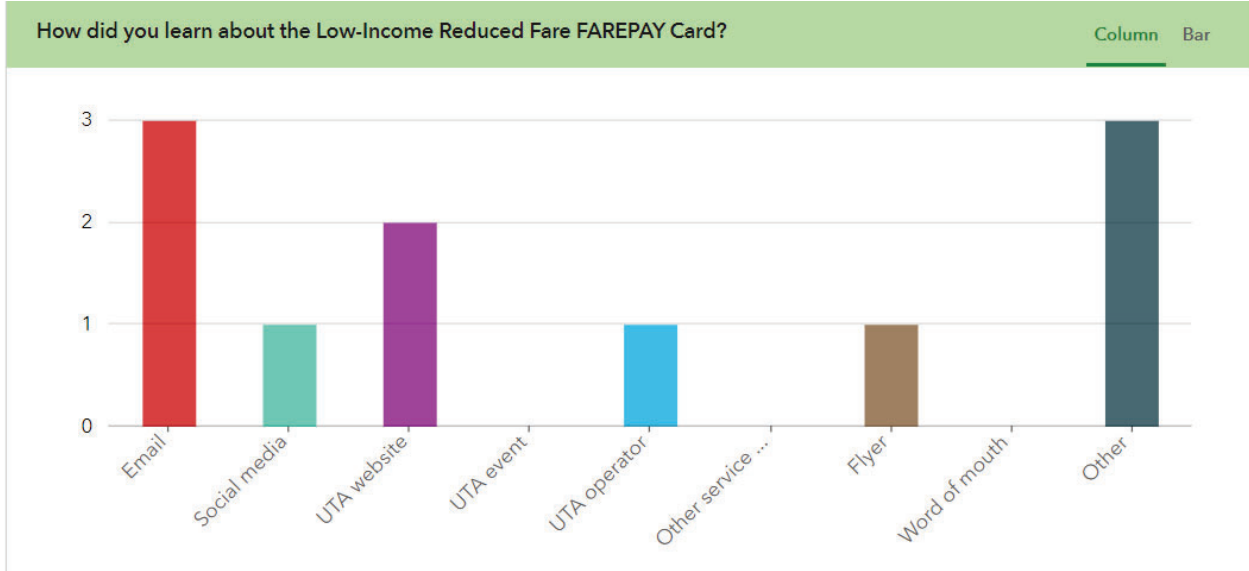
- a. You guys suck.
- b. Every time I have to use my printer/scanner, I have to set it up from scratch.
- c. Bad system.
- d. I have been going to the shelters but there has been no bed space. So I have to get the pass mailed to my parents.

9. How did you learn about the Low-Income Reduced Fare FAREPAY Card?

- a. Email (3 selected)
- b. Other (3 selected)

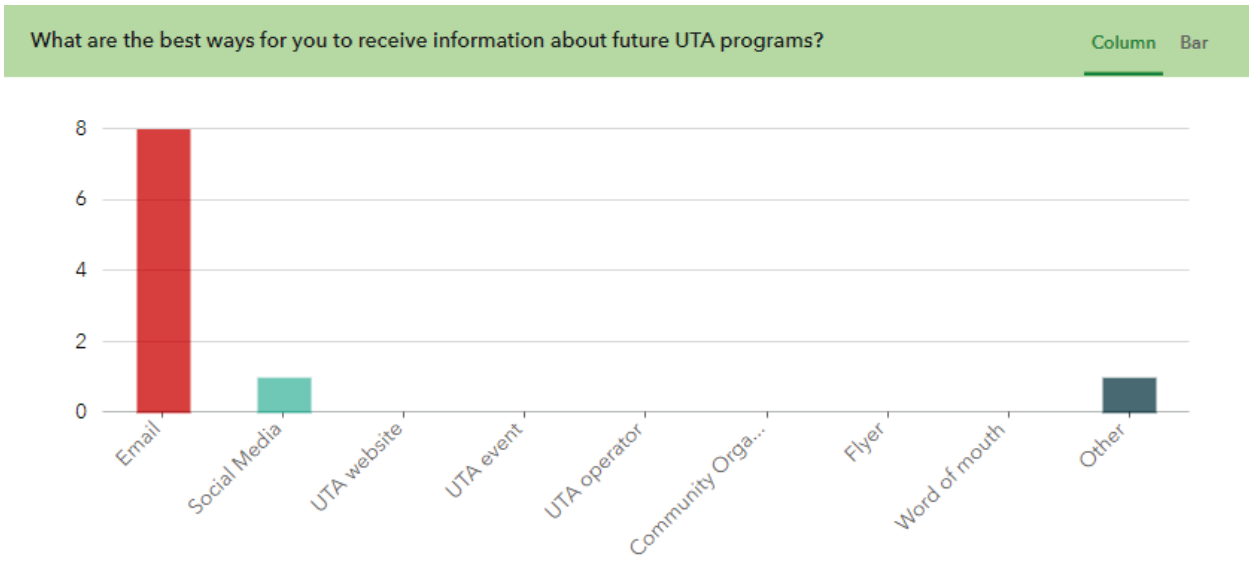


- c. Social media (1 selected)
- d. UTA website (2 selected)
- e. Flyer (1 selected)



10. What are the best ways for you to receive information about future UTA programs?

- a. Email (9 selected)
- b. Social media (1 selected)
- c. Other (1 selected)





11. Is there anything else you'd like to share with us about your experience applying for the UTA Low-Income Reduced Fares FAREPAY Card?
 - a. If you want more people to ride the bus how come the process to obtain a pass is so difficult and why are there so few routes and stops?
 - b. Bad system all together.
 - c. It was a complete joke and waste of my time and research to figure out all of the application process for no end benefit especially.
 - d. Thank you for the opportunity. It's not easy asking for help but UTA makes it easier.



Attachment #2 – Discussion Groups Overview

- Discussion Group #1
 - Tuesday, October 12, 2021
 - 6:00 p.m. – 7:00 p.m.
 - Facilitator: Samantha Aramburu
 - Participants (initials):
 - SB – South Jordan, uses UTA to go to school.
 - MS – Living in Sandy, been riding the bus and enjoying it.
 - KJ – Lives in Provo and travels to Lehi for work. Has one vehicle in the family, so she uses transit to get to work.
 - KS – Moved to Salt Lake City recently, in AmeriCorps Vista.
 - Application Process – Your Experience
 - MS – went to downtown Customer Service location to get his picture taken and to add funds to his card. It was easy for him.
 - KJ– able to do everything online easily.
 - SB – Applied online and it was easy and straightforward. She was very impressed with the quick approval process and delivery of the card.
 - Website Feedback
 - KS– some of the places where there is info on the website is not all connected or easy to navigate. She specifically mentioned fields and subject fields. Easier navigation on the website would be needed. SNAP was really difficult to apply for, and comparatively, applying for this pass was very easy because she was able to use ID from a different state.
 - KJ – she knew exactly what she would need before she applied, and she was grateful it was listed so clearly on the website. It helped her prepare well beforehand.
 - Getting cards mailed
 - MS – it would have been nice to receive a UTA/FAREPAY 101 with the mailed card. He would have like to know that he needed to tap on and off in the case of an overcharge.
 - KJ – has used the FAREPAY card before, so she knew to tap on and off. The card came quicker than she expected. She would like to have an itemized report of each transaction. Question – can you dispute a charge?



- KS - is having a hard time with the card because she doesn't know how to upload the money to buy the unlimited card. She was on the phone for 45 minutes with a Customer Service specialist who didn't know how to answer her questions. She then got disconnected, called back, and the other representative was able to help her quickly.
 - How did you hear about the pass?
 - MS - UTA website. Is there no discount for military members?
 - KS - DWS website
 - KJ - social media (she follows UTA on Facebook)
 - What are other ways you like to acquire information?
 - Social media, emails
 - Welcome email with videos
 - Explain the reloadable option or show picture to pay with cash.
 - Other feedback for UTA?
 - MS - more cold-weather stops. It's harder to take advantage of UTA during the colder part of the year. He rides the 220 and it only has covered waiting downtown.
 - KS - it was frustrating to be on the phone for 45 minutes and then call back and get the right info in ten minutes. She's not totally clear on how to ride the system, as she is new to Utah. Suggested a follow-up email with attachments to know how to ride.
 - KJ - uses the Transit app and this helps a lot. Include transit app information for each bus stop.
- Discussion Group #2
 - Tuesday, October 26, 2021
 - 6:00 p.m. - 7:00 p.m.
 - Facilitator: Cristobal Villegas
 - Participants (initials):
 - TM
 - CB
 - MT
 - JW



- AR
- BA
- Application Process – Your Experience
 - AR – The application process was basic and straightforward. He knew beforehand that he would qualify, so he had no problem signing up. He takes the UTA buses every other day, and everything has been working perfectly.
 - TM – It took some time for her to collect and find all of her information. It also was difficult for her to take a picture of herself and get that uploaded, due to some technology issues. Otherwise, no issues with the application process.
 - BA- Application process was straightforward. He had to go back and forth between Customer Service and home to finally get his card. The process itself wasn't difficult, but he just wasn't aware of the process.
 - JW – She had some difficulty while trying to apply. When trying to log in to the account she had created, she kept getting an error message. She eventually had to reapply, and a few weeks later tried to go back into her account and it was working. Other than that, the application was straightforward.
 - CB – He found nothing difficult about the application process. The language was straightforward, he knew what documents he needed to provide, they were simple to upload and he had no problem waiting for approval. He doesn't remember any complications with the verification code, either.
 - MT – He has a Google Voice number, which is a proxy phone. It takes a lot longer to request verification from the IRS with his phone number. He's still waiting for them to send him a snail-mail verification code so that he can request documents to then provide to UTA for the low-income pass. He doesn't have a formal paystub that he's able to provide, but he could potentially provide evidence of other types of payments/odd jobs that he's done. He could also provide a letter from a past employer.
- Low-Income Requirements – Documents
 - BA – He got a letter from another program that helped him apply since he didn't have other documents.
 - TM – She has had trouble with address verification. She's living with her sister on a semi-permanent basis and is having her mail directed towards her parents' home in Idaho. It would have been easy for her if she could have submitted a note from her sister confirming her living situation and verifying her address that way.
 - AR- the main thing he used was the Medicaid verification. It was an easy way for him to verify his income status.



- Other Suggested Changes:
 - BA – a single verification code would be sufficient. DWS can help with any documents needed.
- Paper Application:
 - BA – For those who don't have a cell phone, a paper application should be an option as well.
 - JW – She didn't have any trouble with the online application, but paper application should be accessible or those people who don't have a phone or a computer.
- Proof of Income:
 - BA – Verified that DWS can provide documents stating that you don't have paystubs.
 - JW – It was pretty easy for her to find her paystubs online, but in a lot of her previous work experience, it would have been difficult to find 60 days of paystubs. 30 days of paystubs rather than 60 would be more doable.
- Communications:
 - TM – She found the information on the UTA website. She doesn't have a lot of experience with UTA outside of FrontRunner. That is one issue she's had with the pass. It feels like the information she has received comes with the assumption that she's very familiar with UTA, when she's actually a new rider. More basic rider information would be helpful for her.
 - BA – He went to Customer Service and an employee there recommended it to him. He has had trouble with a few operators who weren't aware of what the pass was and have denied him entry to the bus.
 - AR – he heard about it through email. He was a regular FAREPAY user previously so he's on that email list.
 - MT – There's an app that he tried to download that informed him about the pass.
 - JW – She found out about the pass through an email from a coworker. A lot of her coworkers require government assistance because they are paid so little. The works closely with the Refugee Services Department, as well, so she heard about it through them.
 - CB – He saw other people using similar passes and found information that way.
 - MT – He called our Customer Service Department to commend an operator, and the agent he was speaking with told him about the Reduced Fares FAREPAY card.



- Experience using the card:
 - TM - She keeps losing the card and hasn't been able to use it a lot.
 - AR - He has had a good experience
 - BA - Besides the few operators who have denied him transport due to their lack of understanding about the pass, he has had no problems using it.
 - JW - She hasn't used her card yet. She can't find the order confirmation number, and she has to put the last four digits of her card and the confirmation.
 - CB - It's been easy, breezy!



Attachment #3 – One-on-One Discussions

- CS
 - For her, the application was easy. She couldn't upload a photo, so she had to go to the Ogden Transit Center to get the photo taken. She didn't see this as too much of a hurdle.
 - The website was easy. She used a friend's smartphone to apply because she doesn't have internet access. She was also able to help her friend apply for the pass, as well.
 - She wouldn't make any changes to the application process.
 - The paper application would *not* have been easier for her, it was nice to be able to do it on a device.
 - Her low-income documentation was not hard to provide.
 - When she went into the Ogden Transit Center to take her picture, they were able to print her card and give it to her there, which she loved.
 - It wasn't an obstacle for her to go to the library to apply.
 - She found out about the pass through an email from the FAREPAY Card Listserv. She's been a FAREPAY card user for awhile and was really excited about the low-income pass.
 - Email is the best way for her to find out about new services/opportunities. She doesn't use social media.
 - She loves having her card. She has a monthly transportation budget, and this pass means that she can literally take double the number of trips than she would normally be able to take.
 - She uploads money online to her pass.
 - The only thing she would change about the pass is to make it even cheaper.
 - She liked the option to transfer her existing FAREPAY balance to her Reduced Fares card.
 - She gives the pass "Five Stars"
- GN
 - He's received his pass but hasn't used it yet. He's having difficulty figuring out how to load money.
 - Lives in South Salt Lake and rides mostly bus and TRAX.
 - Someone recently stole his identity, so it makes him hesitant to use his credit or debit card to pay online.



- He found the link for the pass on the Food Stamps app.
- It would be helpful if the Food Stamps app included a link to the actual Reduced Fares page rather than the generic fares page.
- He has a temporary license. He has had trouble applying for services with it before, so he can't remember if he used his temporary license to apply or not. It was helpful that we accepted it if it is what he used to apply.
- Everything was straightforward.
- He thinks our site is much easier to navigate than DWFS.
- He has pandemic unemployment insurance.
- He had no problem with internet access or his device.
- He gets all his info through apps, so the best way for him to find out about updates and services is through the UTA app (Transit or GoRide).
- The 50% discount is very helpful. He said it's been a very hard year.
- He saw our logo on the food stamps app and trusted it, since he knows the logo.