

**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.

Carlton Christensen, Chair
Board of Trustees

ATTEST:

Secretary of the Authority

(Corporate Seal)

Approved As To Form:

DocuSigned by:
David Wilkins
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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

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Introduction

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

The following analysis is of proposed changes to be implemented in August of 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.

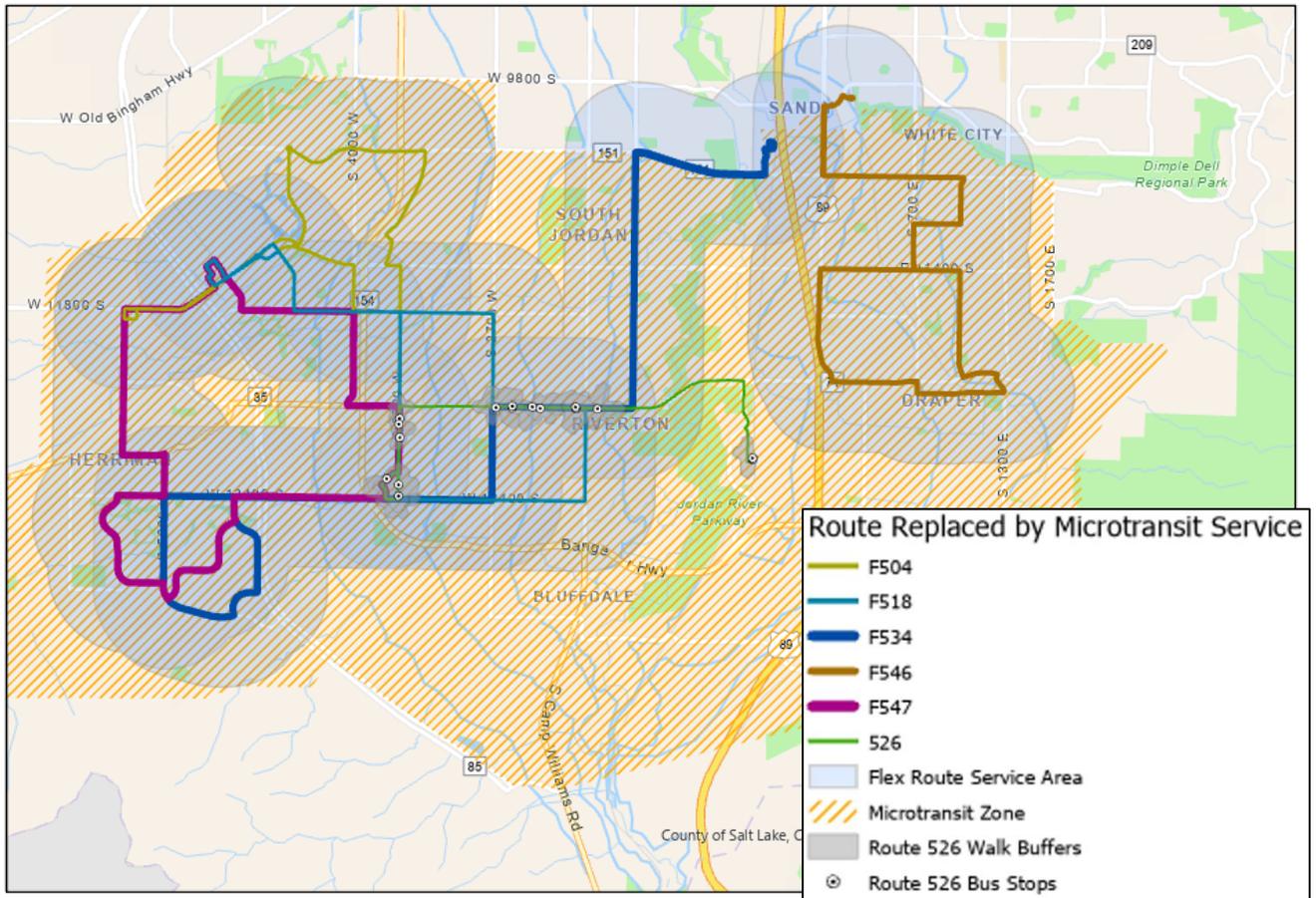
Microtransit is an innovative form of on demand transportation that connects riders with other transit services as well as to other local destinations within the community. Via's technology matches multiple riders headed in a similar direction into a single vehicle; and creates routes that allow for 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.

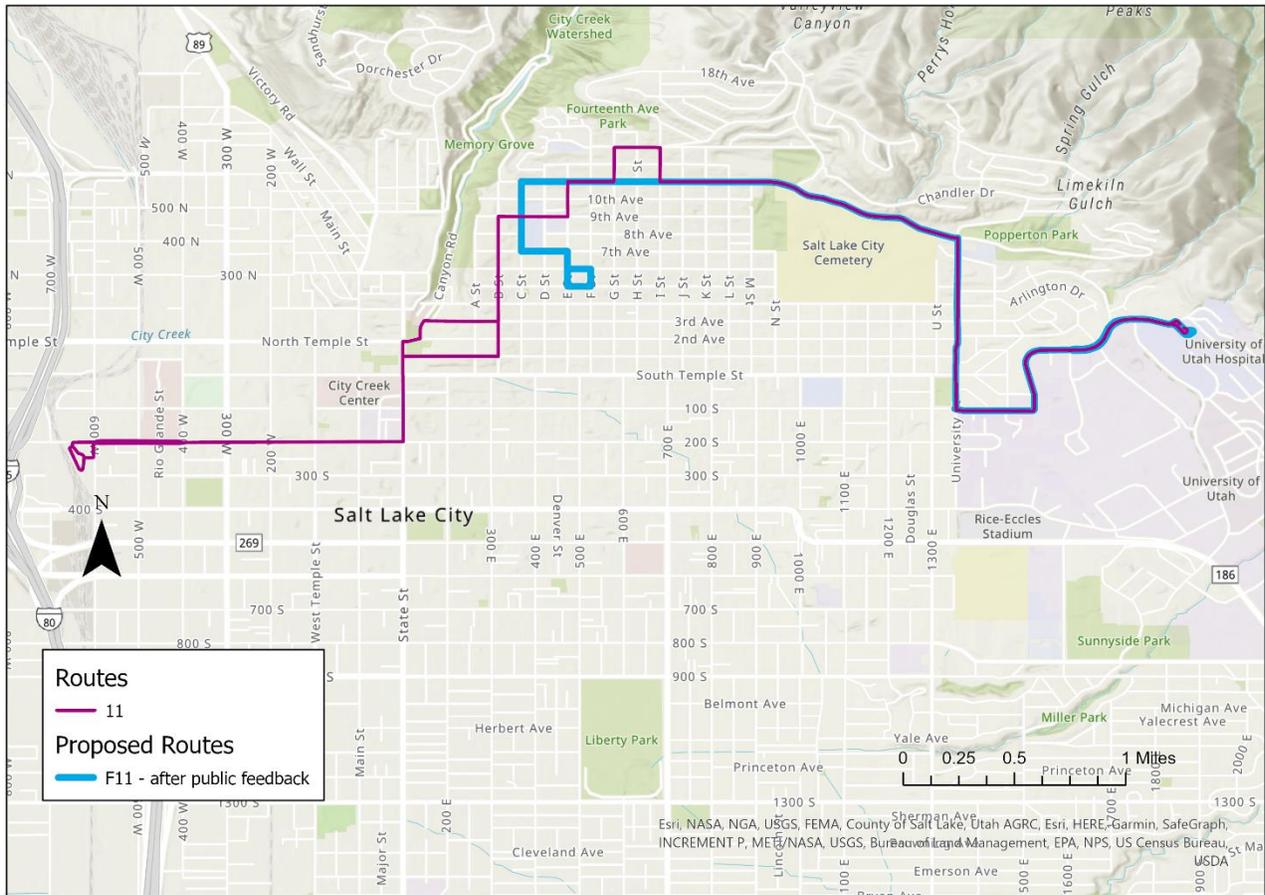


Other Major Changes

Routes 11 & F11

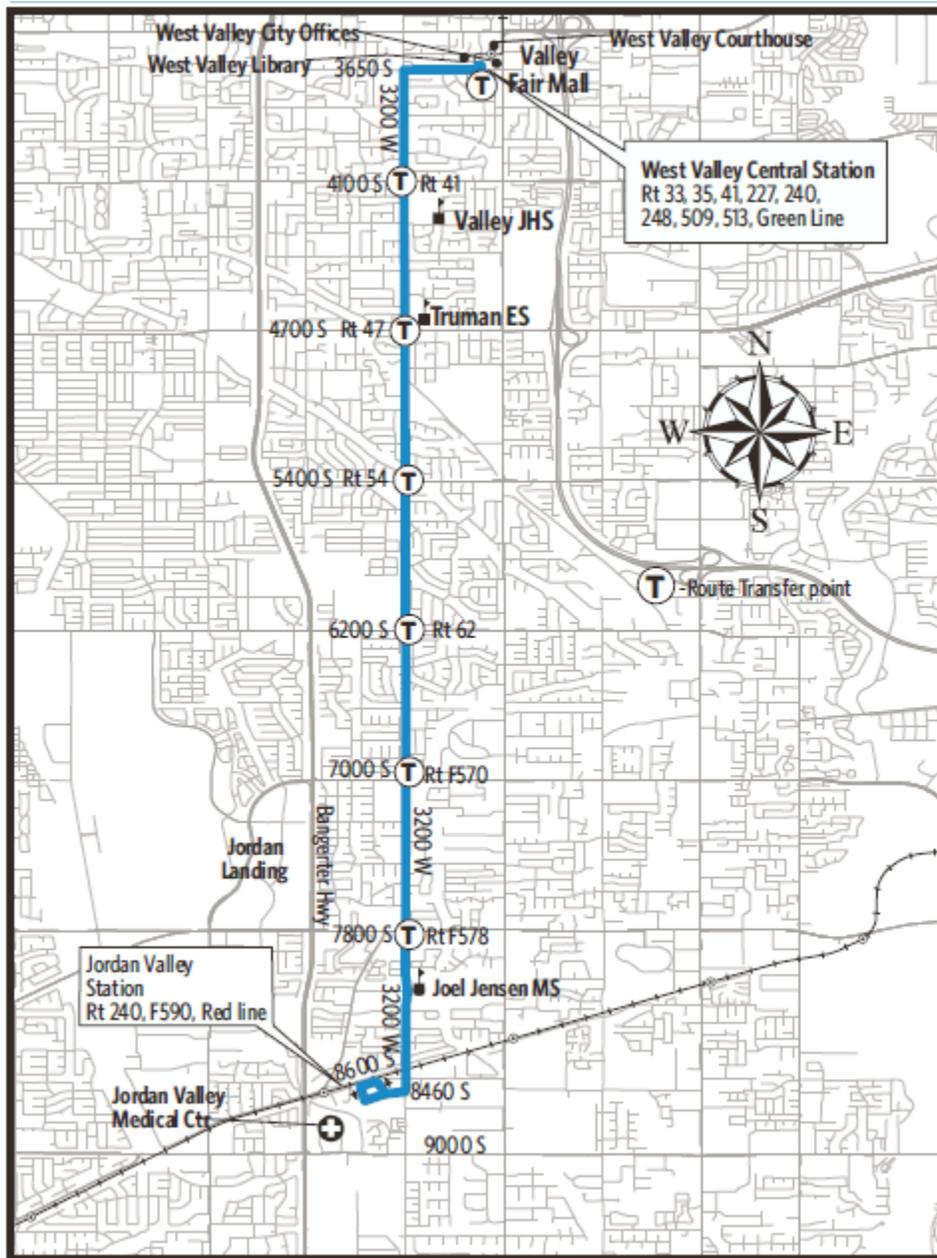
It is proposed to discontinue route 11 as a regular fixed route and replace large portions of it with the new route F11. This will transition it to a service that will be able to deviate from the fixed route and pick riders up within a half mile radius of the route. It will also replace the 40 foot bus 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.



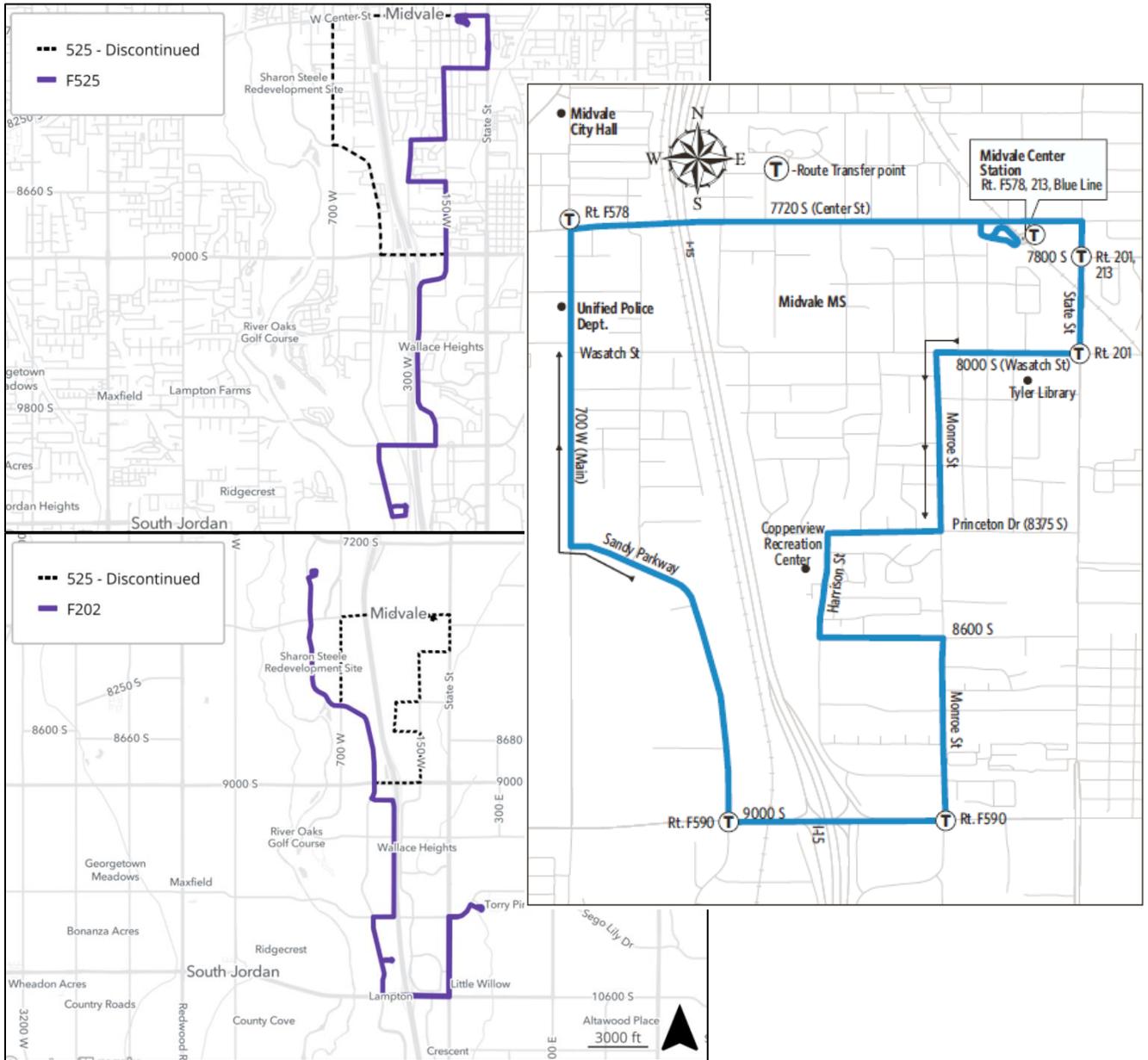
Routes 232 & F232

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%

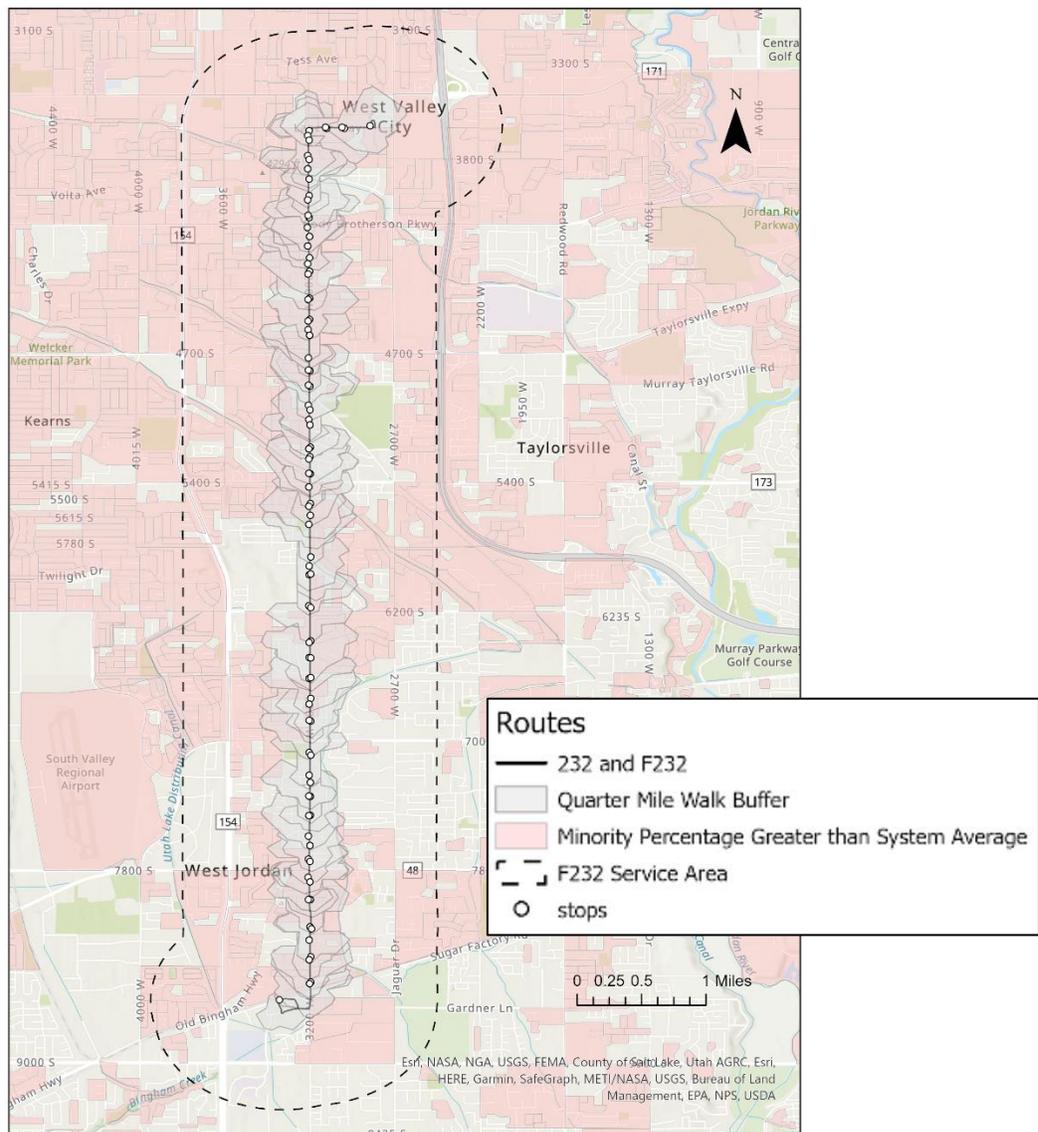
Minority Demographics of New Routes

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.

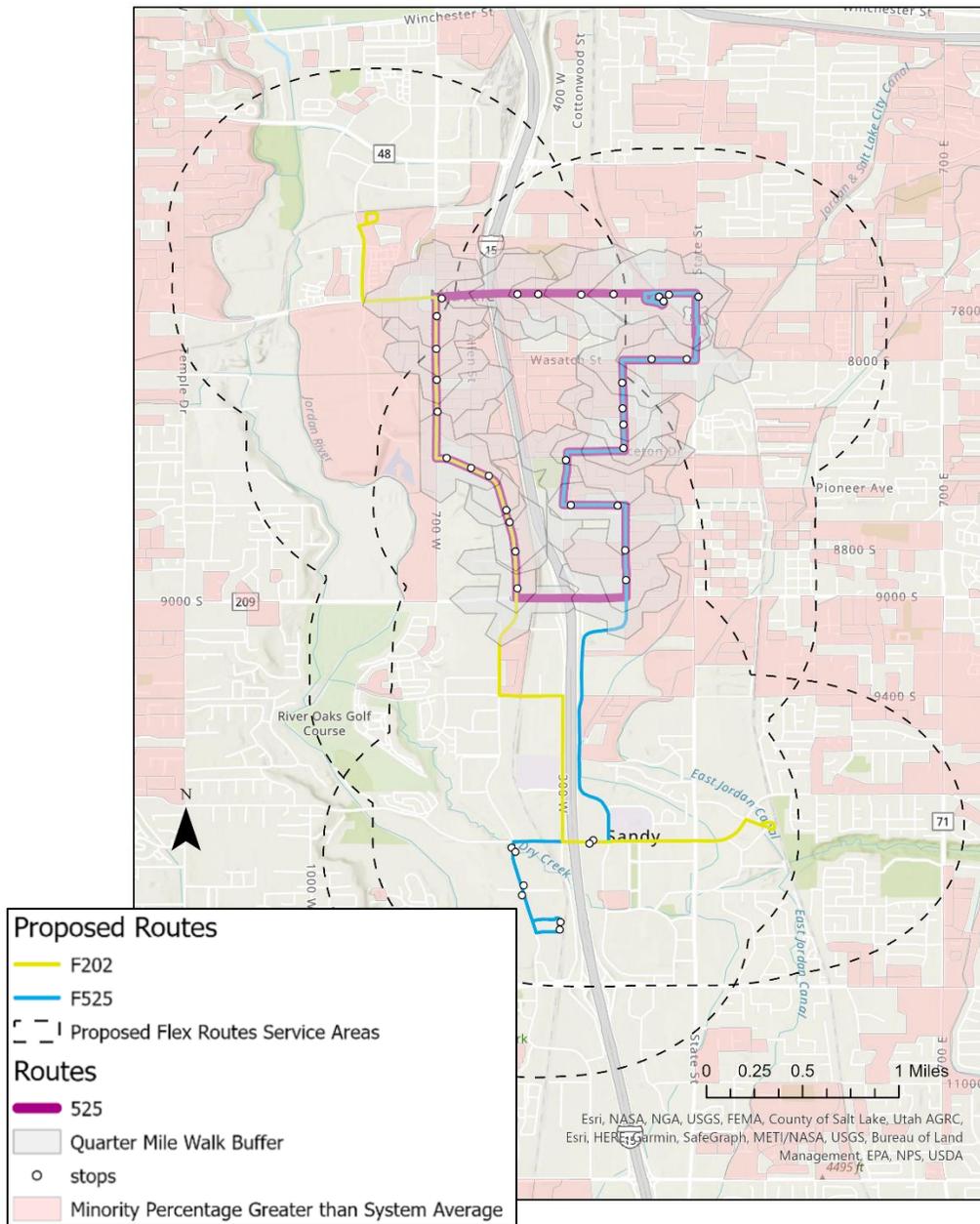
Route 232

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.

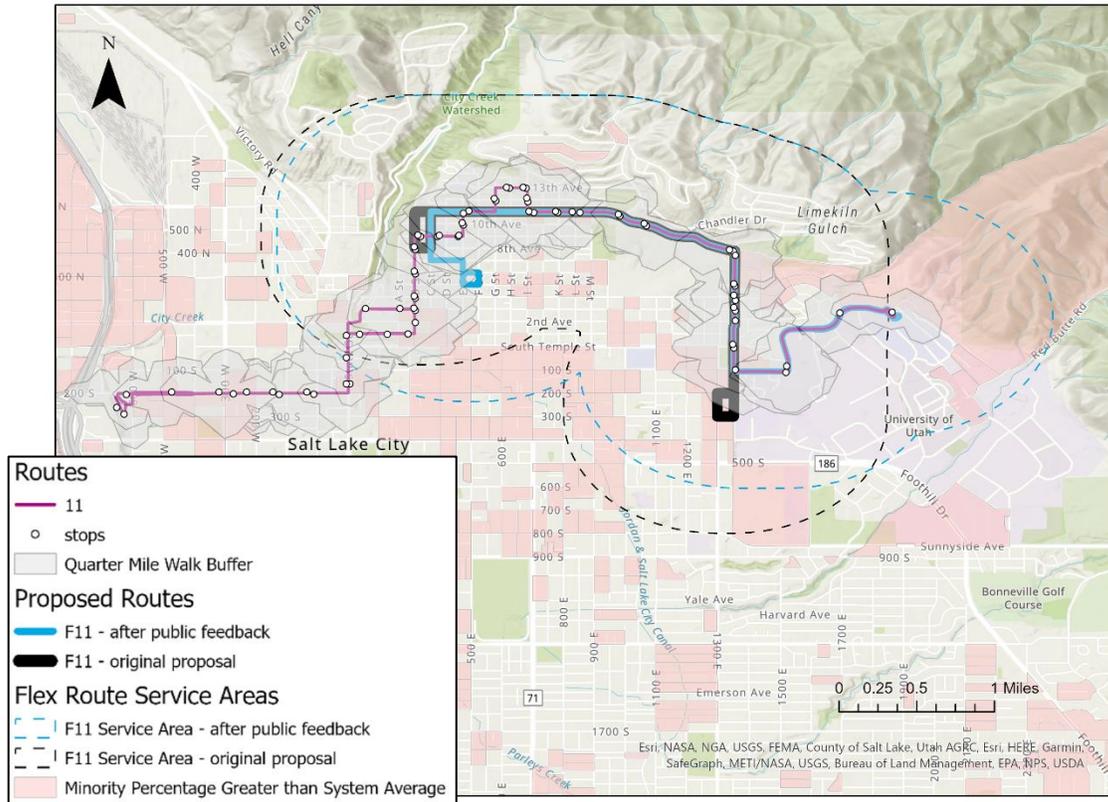


Route 525

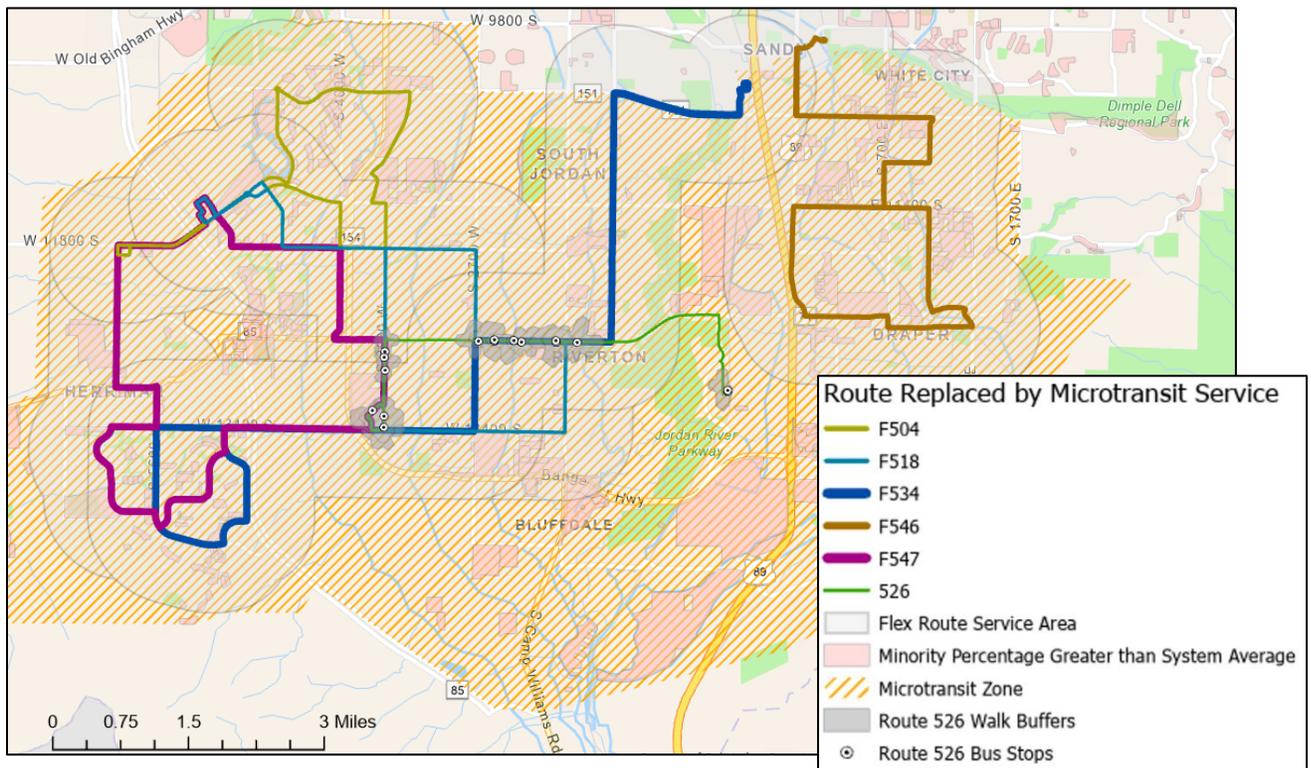
Much like with route 232, the service area and impact of the existing fixed route will be greatly augmented by the addition of flex routes and the addition of more routing will provide additional connections that do not exist with the current 525 alignment. However, based on the data presented, there 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

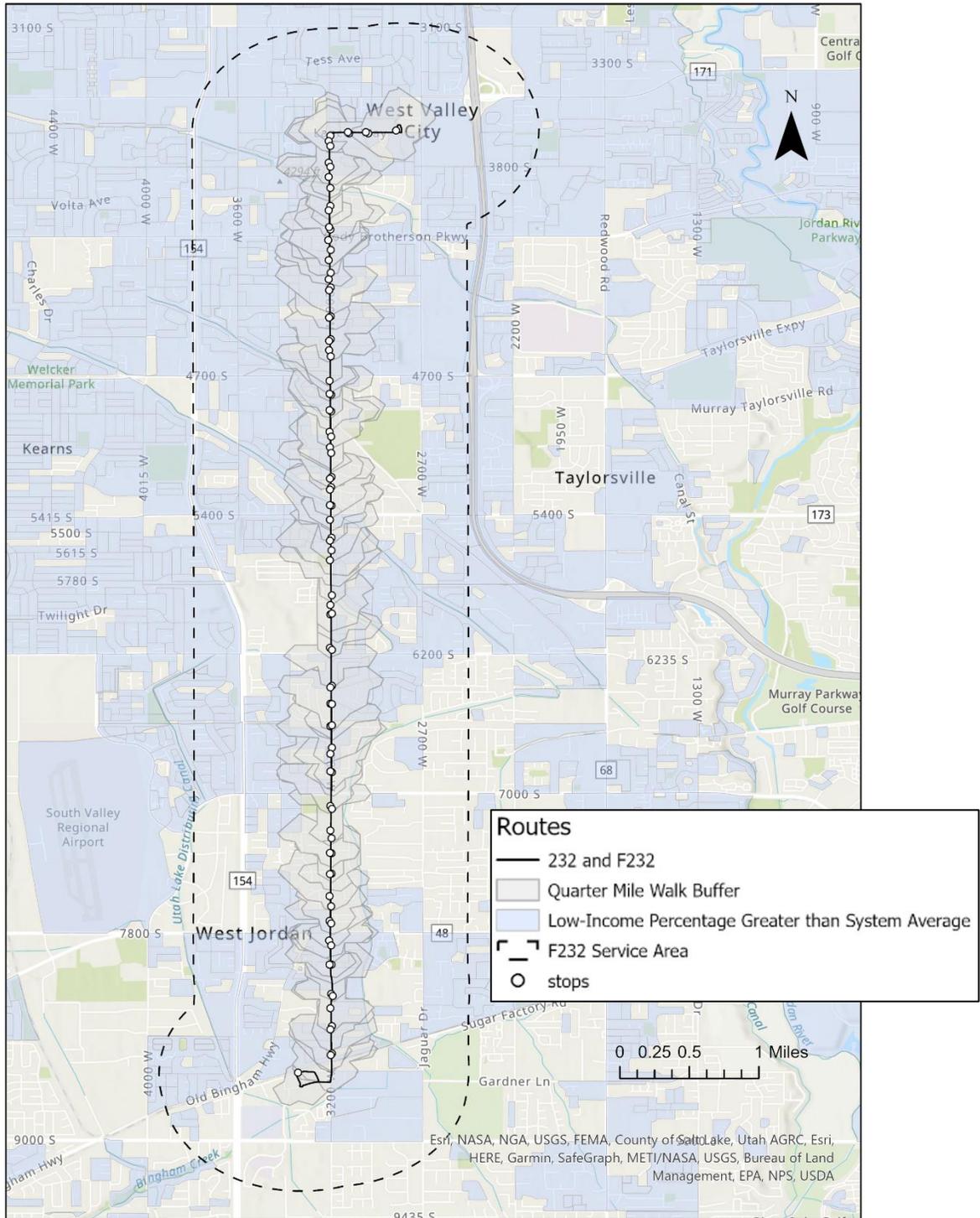
Route	Total Population	Low-Income Population	Low-Income Percent	Difference From System Average
11	18,507	3,787	20.5%	3.3%
232	31,495	4,873	15.5%	-1.7%
525	15,164	4,677	30.8%	13.6%
526	6,354	257	4.1%	-13.1%
F504	47,900	2,553	5.3%	-11.9%
F518	65,139	3,591	5.5%	-11.7%
F534	74,906	3,522	4.7%	-12.5%
F546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

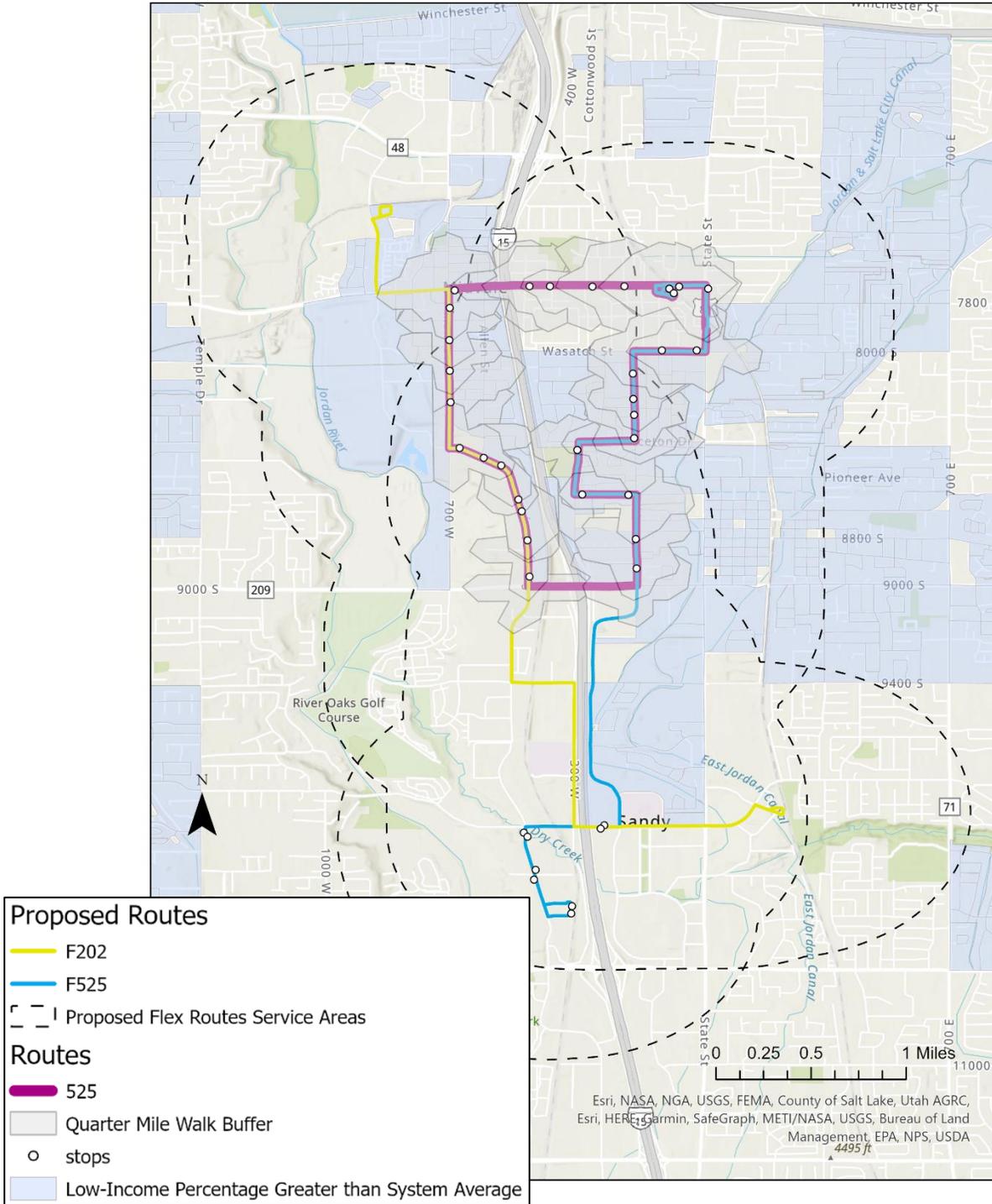
In reviewing the data presented, UTA identified the potential for a disproportionate burden on route 525 in accordance with UTA's disproportionate burden policy. The impacted populace has a percentage of low-income living within its bounds showing the potential of a negative impact in excess of 5% greater 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

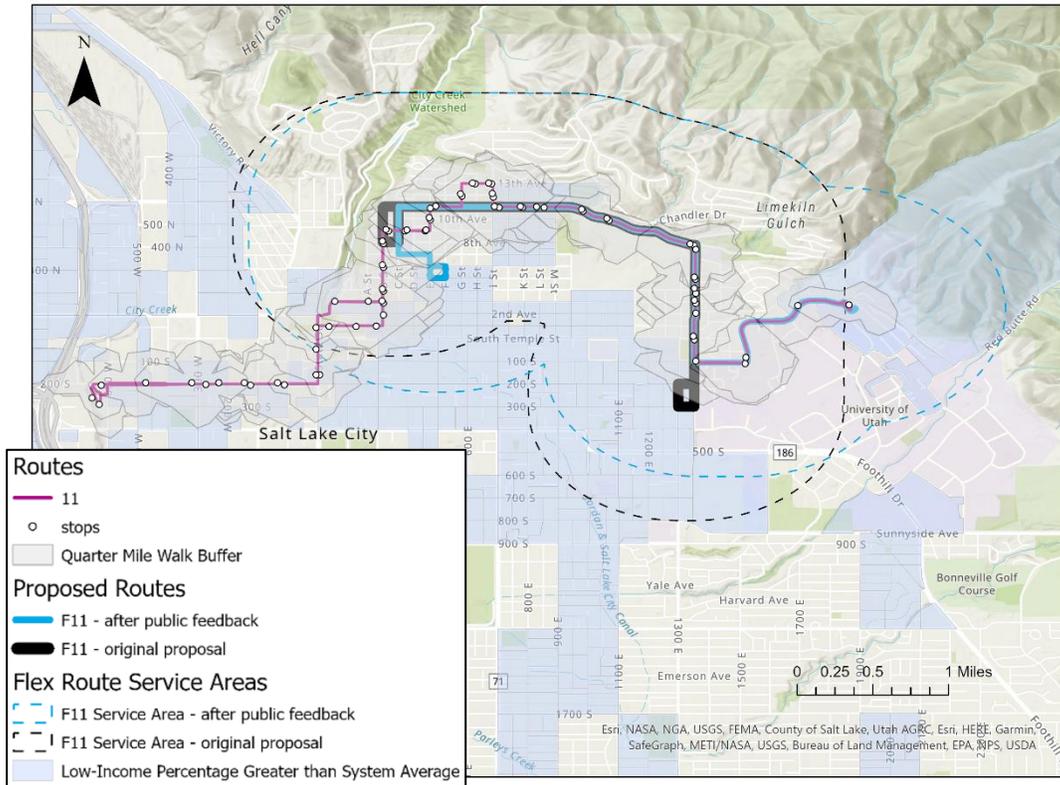


Route 525

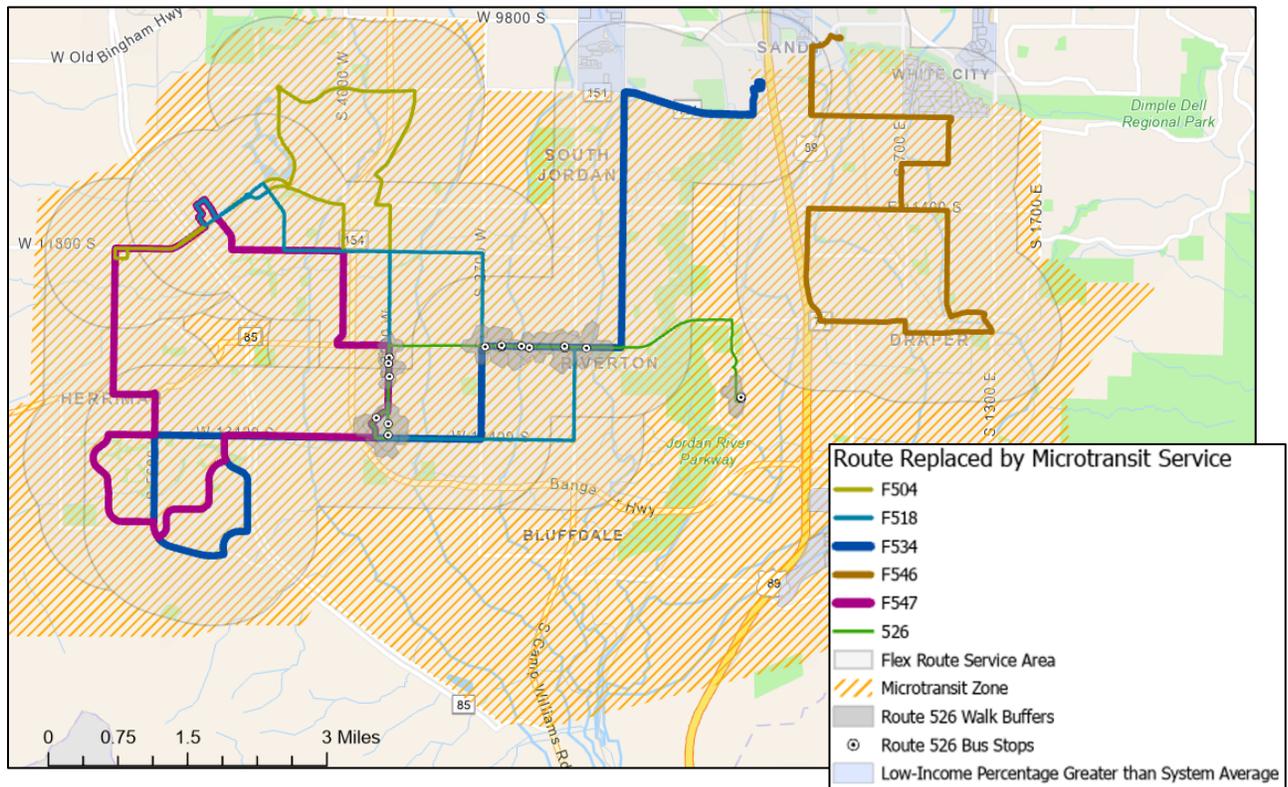
For a full narrative on this change, see the disparate impact portion of this analysis regarding route 525. There were no areas that lost service and the flex routes expanded the service area.



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 2 – Public Notice Proofs

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

WWW.SLTRIB.COM

LEGAL NOTICES

NOTICE OF PUBLIC HEARING AND COMMENT PERIOD
UTAH TRANSIT AUTHORITY

RE: August Service Changes. The Utah Transit Authority (UTA) is proposing several changes to transit service beginning in August. The proposed changes aim to improve flexibility and access, connect riders to transit where and when they need it, and replace and upgrade routes with on-demand service or new Flex routes for increased mobility. A 30-day public comment period will occur April 28 through May 28; 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 rida.uta.com/AugustChanges. The proposed fare changes will be available for public review and comment from **April 28, 2021 – May 20, 2021**. Comments must be received, premarked or electronically submitted to UTA through one of the following methods by **5 p.m. on May 20, 2021**, to be considered as part of the public comment record:

- **Phone:** 801-743-3882, option 5
- **Mailing:** Utah Transit Authority, C/O Megan Waters, 669 W 200 S, Salt Lake City, UT 84101
- **Website:** rida.uta.com/AugustChanges

Public Hearing Date & Format:
 There will be a public hearing on **Wednesday, May 12, at 6pm-7pm**. Due to COVID-19 gathering restrictions and in compliance with Governor Cox's executive order regarding open meeting laws, this will be an all-electronic Zoom meeting with **no anchor location**. The public hearing meeting will provide an overview of proposed service changes, take questions, and accept public comment from participants.

Listen Only: If you wish to view and listen (only) to the formal meeting, you can do so live at UTA's Facebook page: <https://www.facebook.com/RideUTA/>

Participate: If you would like to provide a public comment during the public hearing on May 12, please register to join via Zoom any time prior to the hearing conclusion: <https://us02web.zoom.us/join?pwd=VWp1M2o0AA4HdW91cm91Z0p0>

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 three minutes per person. All who wish to view the hearing following the event may do so through our YouTube channel or Facebook page.

Public Open House
 UTA Customer Service locations will host information about proposed service changes onsite in an informal open house format during the public comment period from April 28 through May 28. Members of the public who wish to learn more and leave a comment in person can do so at the following locations, Monday through Friday, between the hours of 8:30 AM and 5:00 PM:

- Timpanogos**
 1110 S. Geneva Rd, Orem, UT 84058
 (801) 227-8923
- Downtown Salt Lake City**
 250 South 600 West, SLC, UT 84102
 (801) 287-4664
- Meadowbrook**
 3600 South 700 West, SLC, UT 84119
 (801) 262-5626
- Ogden Transit Center**
 393 West Avenue, Ogden, UT 84401
 (801) 626-1207

Additional information about community engagement opportunities can be found at rida.uta.com/AugustChanges.

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 **801-252-5626** or **dtd.711** to make a relay call for deaf or hearing impaired persons.

Proposed Major Service Changes

Routes changed with a new service type:

- Route F524—Replaced by UTA On Demand
- Route F578—Replaced by UTA On Demand
- Route F526—Replaced by UTA On Demand
- Route F546—Replaced by UTA On Demand
- Route F547—Replaced by UTA On Demand

Routes changed with a new service type, new route alignment, and an updated schedule:

- Route T1—Replaced by T11, increased weekday service to 30 min, and added Saturday service
- Route C32—Replaced by F502, increased weekday service to 30min and added Saturday service
- Route S25—Replaced by F502, F525 increased weekday service to 30 min and added Saturday service
- Route F514—Increased weekday service to 30 min
- Route F506—Moved to 7800 South, discontinues route on Cottonwood Dr. 6200 South (replaced by S4)
- Route F576—Moved to 3600 West, discontinues Jordan Landing loop (replaced by 242, F570)

Routes changed with a reduction in frequency:

- Route S27—Reduce frequency during Friday due to low ridership. **SLT510310**

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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)

- 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

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**



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

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or rideuta.com/AugustChanges**



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

- Promo code for on demand service

HAIL VIA. RIDE UTA.

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