



PARK CITY MUNICIPAL CORPORATION
TRANSPORTATION DEPARTMENT

**TITLE VI GENERAL
REPORTING
REQUIREMENTS**

NOVEMBER 30, 2022

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A. TITLE VI NOTICE TO THE PUBLIC

Notice to the Public of Rights Under Title VI



Park City Transit (PCT) is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services or programs on the basis of race, color, national origin, or other protected class as afforded by Title VI of the Civil Rights Act of 1964. PCT operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who believes she, he, or they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, national origin, or other protected class may file a complaint with PCT.

For more information on PCT's civil rights program, and the procedures to file a complaint, contact our Title VI Program Administrator at 435-615-5371 or by e-mail at PCTcompliance@parkcity.org; visit our website: www.parkcitytransit.org; or visit our administrative offices at 1053 Iron Horse Drive, Park City, Utah 84060.

A complainant may also file a complaint directly with the Federal Transit Administration by email at FTACivilRightsCommunications@dot.gov or by mail at the following address: Federal Transit Administration, Office of Civil Rights Attention: Complaint Team, East Building, 5th Floor-TCR 1200 New Jersey Ave. SE Washington, DC 20590

This information is available in alternative formats and languages, free of charge, upon request. Please contact Park City Transit at (435) 615-5301 Monday thru Friday 8:00am to 5:00pm. After hours leave a message at (435) 615-5350.

B. POSTED LOCATIONS OF THE TITLE VI NOTICE

PCT's Title VI notice to the public is posted at the following locations:

- PCT's website: <http://www.parkcitytransit.org>
- PCT's Administrative Offices, 1053 Iron Horse Drive, Park City, Utah 84060
- PCT's Rider's Guide
- Every Transit Vehicle in Service
- Old Town Transit Center

C. PROCEDURES FOR FILING A TITLE VI COMPLAINT

Any person who believes that she, he, or they, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin, or other protected-class interests may file a written complaint with PCT, the Federal Transit Administration (FTA), the U.S. Department of Transportation (USDOT), or the U.S. Department of Justice (USDOJ). Further, PCT prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because she, he, or they have filed a complaint to secure their rights as protected by Title VI.

Policy

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

“No person in the United States shall, on grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance.”

To ensure compliance with this requirement, it is the policy of Park City Municipal Corporation to ensure that all federally funded transit services and related benefits are provided without discrimination in a manner consistent with Title VI.

Purpose

The purpose of this procedure is to provide the right of a fair hearing without fear of prejudice to any persons who feel they have been subjected to discrimination on the basis of race, color, or national origin with respect to transportation service or other transit benefit. The goal of the procedures as defined is to provide an avenue for speedy solutions and remedies to problems associated with issues of discrimination in the event they arise. Any individual needing assistance with the Complaint Grievance procedure may ask the Park City Attorney's Office for such assistance, as necessary.

Definitions

a. *Discrimination Appeals Board*: The City Manager or his/her designee, an attorney for the City

Attorney's Office, and a Manager other than the Transportation Director.

b. *Complaint:* A Complaint shall be defined as a written assertion that any person, individually or as a member of a specific class of persons, has been subject to discrimination on the basis of race, color, or national origin by the Park City Municipal Transit System or its contractors, employees, or agents.

c. *Title VI Officer:* An employee of Park City designated by the City Manager to process Complaints according to procedure specified in this policy.

d. *Transportation Director:* The Transportation Director within the Park City Transportation and Parking Fund.

Complaint Procedure

1. Any person who believes she, he, or they have been discriminated against on the basis of race, color, or national origin by Park City Transit Department (hereinafter referred to as "the Department") may file a Title VI complaint by completing and submitting the Department's Title VI Complaint Form (Appendix A. or B.) to the Park City Municipal Corporation City Attorney's Office. The City Attorney's Office investigates complaints received no more than thirty (30) days after the alleged incident. The Attorney Office will process complaints that are complete. Any individual needing assistance with writing the complaint may ask the City Attorney's Office for such assistance.

2. Once the complaint is received, the City Attorney's Office will review it to determine if Park City has jurisdiction. The Complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the City. The complaint shall be forwarded to the Title VI Officer. The Officer shall investigate the complaint and prepare a written response, including any remedial or enforcement action, within thirty (30) calendar days and forward the response to the Complainant and Transportation Director. A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

3. Board Appeal Level

In all cases where the Complainant or Transportation Director disagrees with a decision of the Title VI Officer, the Complainant or Transportation Director may appeal the decision of the Title VI Officer to the Discrimination Appeals Board. The appeal shall be taken by filing written notice of the appeal with the City Recorder within ten (10) calendar days after the decision of the Title VI Officer. Upon the filing of the appeal, the Discrimination Appeals Board shall commence its investigation, take and receive evidence, and fully hear and determine the matter. The Complainant and Transportation Director shall be entitled to appear in person and to be represented by counsel, to have a hearing, to confront the witness whose testimony is to be considered, and to examine the evidence to be considered by the Appeals Board. The Discrimination Appeals Board's decision shall be provided to the Complainant and the Transportation Director in writing.

State and Federal Appeal Process

In the event the Discrimination Appeals Board upholds the Title VI Officer's decision, the Complainant or Transportation Director may file the complaint with the Utah Department of Transportation, the Federal

Department of Transportation, or the Federal Transit Administration

Offices as follows:

Utah Department of Transportation

Civil Rights Division

4501 S 2700 W

PO Box 141520

Salt Lake City, Utah 84114

(801) 965-4384 Office

(801) 965-4101 Fax

Federal Transit Administration

Office of Civil Rights

Attention: Complaint Team,

East Building, 5th Floor-TCR

1200 New Jersey Ave. SE

Washington, DC 20590

The Complainant or Transportation Director should contact the relevant agency to determine the applicable requirements and the deadlines for filing a Complaint with that agency. UDOT, DOT, and FTA Complaints must generally be filed within one hundred eighty (180) calendar days of the alleged discrimination.

Effective Date November 30, 2022

Matt Neeley, Transportation Director

D. RECORD OF INVESTIGATIONS, COMPLAINTS, LAWSUITS

Over the past three years, one race discrimination complaint was filed, the investigation was inconclusive. No lawsuits have been filed against PCT alleging discrimination on the basis of race, color, national origin, or other protected class.

E. PUBLIC PARTICIPATION PLAN - PROMOTING INCLUSIVE PUBLIC PARTICIPATION

Public involvement is fundamental and essential in achieving an equitable program, services, and activities. Public participation provides for public involvement of all persons, including Native American Tribal Governments, minorities, and low-income persons, affected public agencies, employees, the general public, transportation service providers, public transit users and other interested parties of the community effected by transit and transportation plans, programs, and projects.

In order to integrate the considerations expressed in the USDOT Order on Environmental Justice and the USDOT LEP Guidance into community outreach activities, PCT seeks out and considers the viewpoints of minority, low-income, and limited English proficiency populations in the course of conducting public outreach and involvement activities. PCT's public participation strategy strives to offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transit and transportation decisions.

F. SUMMARY OF OUTREACH METHODS

Public meetings and hearings are held in accessible locations for disabilities. PCT also encourages all members of the community to participate in hearings/meetings by promoting them in local media. PCT provides a variety of public meetings at various locations and times which are designed to be accessible to all members of the community. Meeting times and locations are posted in local papers, at local community organizations, and through radio announcements. For all of PCT's public meetings an advertisement is posted in the newspaper asking the public whether they have special needs so that PCT can accommodate them.

E.g.

Individuals needing special accommodations or interpretation services, free of charge, during the meeting should notify Park City Transit at (435) 615-5301, at least 24 hours prior to the meeting.

The Park City Transit Department has a relatively large percentage of Spanish speaking drivers. Spanish speaking drivers have been asked to work with Spanish speaking riders in order to assess what services are working and should be improved to better serve the transportation needs of the Hispanic community in Park City. In 2020, Park City Transit published our first riders guide in Spanish. Every service change since has had a Spanish guide available as well as an English guide. In July of 2022, Park City Municipal adopted a bilingual language stipend. Employees who qualify for the stipend must speak a language that is on the approved list for the city (ex. Spanish). Each pay period the qualified employee will receive a \$40 stipend.

G. SUMMARY OF OUTREACH EFFORTS SINCE 2019

Park City Transit provides critical transportation for a wide variety of riders. Employees, business owners, residents, and visitors all rely on Park City Transit to get around our town. Over the last three years, Park City Transit has used a wide range of community engagement methods to reach our audience as we've responded to the COVID-19 pandemic and the launch of a separate transit system in the greater Park City region.

Existing Outreach Plans and Guidelines

As a city department of Park City Municipal Corporation, Park City Transit works closely with our Community Engagement team to plan and implement effective and inclusive community engagement. Some existing plans and studies provide overarching guidance for our outreach practices. These efforts include:

- [Park City Vision 2020](#)
- [Short Range Transit Plan Update](#)
- [Park City Forward](#) (Long Range Transit Plan)
- [2019 Transit On-Board Survey](#)

Community Engagement Methods Used 2019-2022

Park City Transit works to promote service change information and public input opportunities directly to our riders through in-system promotion, but also works to gather input from former or potential riders throughout our community with broader outreach methods. We provide all information in English and Spanish with the help of a professional translation agency. We conduct outreach in advance of all service changes, which occur 2-5 times per year in the spring, summer, fall, early winter, and winter. Over the last three years, the use of outreach methods has varied depending on the audience and impacts of proposed service changes. For example, we utilized digital outreach methods, media coverage, and in-system notices for emergency service reductions in March 2020. For a planned 35% reduction in service for the winter 2020-2021 season, we conducted a major community survey and launched a project website, in addition to notices throughout our system and outreach to social organizations. Since the spring 2022 service change, we have used each of the following outreach methods:

- Park City Transit website notices
- Park City Transit app alerts
- Surveys and Comment Forms
- Flyers and posters on buses, at transit centers, and bus stops
- Twitter, Facebook, and NextDoor
- Facebook Live events
- Open Houses – in-person and virtual
- Postcards mailed to every address in Park City to promote open houses and public comment forms
- Park City Newsletter
- Media outreach
 - Press releases and news briefs distributed to media contacts
 - Appearances on KPCW and PCTV
 - Coverage through Park Record and TownLift
- Outreach to social organizations

- Park City Community Foundation
- National Ability Center
- Historic Park City Alliance
- Lodging Association
- Park City Chamber
- Ski Utah
- Outreach to stakeholder groups
 - HOA contact list
 - Email contact lists
 - Door-to-door outreach to Main Street employees

Outreach Events 2019-2022

Park City Transit has attended or hosted a wide variety of events to promote service changes, gather input, and spread general information about transit services. These events include:

- Try Transit Week [January 2020]
- Ride On Commuter and Transit Challenge [January 2020, December 2021-March 2022]
- Park City Senior Center Outreach (1-2 times per year)
- Park Silly Sunday Market (1-3 times per year, cancelled for the 2020 season)
- Park City Projects Open Houses (2 times per year)
- Haunted Trolley (1 time per year in October)
- Short-Range Transit Plan Open House [March 2022]
- Noches De Verano (Spanish-language concert) [June 2022]
- Utah Pride Festival [June 2022]
- Park City Library Storytime [August 2022]
- Winter Transit Service Open Houses (3 in-person events and 1 virtual event) [August 2022]
- Park City Community Foundation Super Sunday (Spanish-language event) [August 2022]
- Miner's Day Parade [September 2022]

H. LANGUAGE ASSISTANCE PLAN (LAP)

PURPOSE

Park City Transit (PCT) is a recipient and subrecipient of federal financial assistance and grants from Federal Transit Administration (FTA) and Federal Highway Administration (FHWA). As such, PCT must comply with Executive Order 13166-- Limited English Proficiency (LEP).

This Language Assistance Plan (LAP) is designed to assist management and staff to understand their roles and responsibilities with respect to overcoming barriers for Limited English Proficiency (LEP) individuals. This LAP will provide guidance to staff on translation, interpretation, and outreach services for LEP individuals seeking access to PCT programs and services. This LAP supplements PCT's Title VI Program Plan and the Public Participation Plan.

POLICY STATEMENT

PCT, under Title VI of the Civil Rights Act of 1964, ensures that no person shall, on the basis of race, color or national origin, or other protected class be excluded from participation in, be denied the

benefits of, or be otherwise subjected to discrimination under any program or activity it administers. As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency. It is the policy of PCT to provide timely, reasonable, effective and meaningful access for LEP persons to all its programs and activities. All staff shall provide free language assistance services to LEP individuals with whom they encounter or whenever an LEP person requests language assistance services. All staff shall ensure the public is treated with dignity and respect, identify the language needs of PCT customers, and utilize available bilingual resources to assist customers, when needed.

PCT will ensure the provisions of this LAP will apply and be incorporated into agreements with subgrantees and contractors as subrecipients of federal financial assistance.

LANGUAGE ASSISTANCE PLAN

Limited English Proficiency (LEP) individuals are those who do not speak English as their primary language and/or who have a limited ability to read, write, speak, or understand English. PCT provides language assistance to ensure that LEP individuals have meaningful access to its services, including route information, telephone-based customer service, printed materials including public meeting notices, and other customer based services.

Our LAP reflects the overall goal of improving and maintaining language access for PCT customers as transit riders and project recipients. We will continue to establish balance by ensuring meaningful access to programs and services while avoiding undue burden on PCT resources. It is important to inform LEP individuals that services are available in other languages, including Spanish, and they are free of charge. PCT will continue to use existing resources to meet the requirements of Executive Order 13166 and expand as determined by regular monitoring of the LAP. The most widely used LEP services will be translating verbal and written communications.

A. Identifying LEP Individuals Needing Language Assistance

Collaborate with minority organizations to ensure LEP persons are aware and have access to PCT services.

Examination of four factor analysis.

PCT may examine social media and customer service records to look for previous language assistance and to determine if language assistance might be needed at future events.

Have language identification cards available for individuals to identify the language they speak.

B. Language Assistance Measures

Language assistance will be provided to LEP individuals through the translation of vital documents and notices, as well as through verbal language interpretation when necessary and possible. LEP individuals are not obligated to provide their own interpreter, although many do so.

Continue to translate all program brochures and meeting notices into Spanish.

Interpreters will be provided at public meetings when necessary.

Continue to use Linguistica, a language translation service, to provide translation services, including Spanish, for public counter customer service and telephone calls to PCT.

C. Training Staff

Staff will be trained on PCT's Title VI policy and LAP responsibilities.

D. Providing Notice to LEP Individuals

Provide direct line for interpretation services on program brochures and vital documents.

Provide a statement affirming PCT will make reasonable accommodations to provide an interpreter at public meetings and hearings with advance notice.

Continue to provide vital documents, such as Title VI complaint form and various brochures and public notices in Spanish.

Include in notifications that there is no charge for language assistance.

MONITORING AND UPDATING THE LAP

PCT's Title VI Coordinator shall monitor implementation of the LAP, revising the plan, as may be required periodically. In monitoring compliance, an assessment will be made whether the plan allows LEP individuals to overcome language barriers and participate in a meaningful way in the program activities and services. In 2022, PCT began developing an annual reporting strategy for community engagement, including data on local language demographics.

Monitoring shall consider information from the following sources and criteria, as well as other factors as may be appropriate:

- Changes in demographics, including new language groups, types of services and other activities
- Frequency of encounters with LEP persons
- Whether existing LEP language services are adequate
- Availability of new resources, including technology

Full review of the LAP will occur with each triennial Title VI program submission.

I. MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS

In 2021, after the launch of High Valley Transit, the Joint Transit Advisory Board (JTAB) was disbanded. As of November 2022, PCT does not have any transit-related, non-elected boards, advisory councils or committees, or similar committees whose members are selected by PCT for transit related decision-making purposes. PCT is currently evaluating community outreach with the intention of implementing

such a committee or council in the future.

In the event PCT establishes any transit related, non-elected boards, advisory councils or committees, the Title VI Coordinator will maintain a table showing the demographic breakdown of the membership, and a description of the efforts made to encourage minority participation.

J. EFFORTS TO ENSURE SUBRECIPIENT COMPLIANCE

PCT does not have any subrecipients at this time. In the event PCT does begin to pass-through funds to a subrecipient, overall monitoring and compliance reviews will be performed on PCT's subrecipients to ensure compliance with Title VI responsibilities.

K. TITLE VI EQUITY ANALYSIS

During the reporting period, PCT did not construct any facilities requiring a Title VI Equity Analysis.

L. BOARD MEETING MINUTES OR GOVERNING BODY APPROVAL

As governing officials responsible for policy decisions within Park City Transit, the Transportation Director, the Human Resources Director, and the City Attorney have reviewed and approved this Title VI Program prior to submission (Appendix D).

M. SYSTEM-WIDE SERVICE STANDARDS

PCT, as a small transit provider, is responsible for setting system-wide service standards and policies. PCT seeks to ensure that our transportation services are not determined on the basis of race, color, or national origin. PCT includes frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes in routing and scheduling determinations.

To ensure our service standards and the service policy requirements are being met, PCT examines current Vehicle Load, Vehicle Headway, On Time Performance and Service Availability for each mode of transportation.

Vehicle Load Standards for Each Mode –

Vehicle Load Factor is described in FTA Circular 4702.1B Chapter IV (4) (a) (1):

“Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standards for peak and off-peak times for each mode of fixed-route transit service (i.e., bus, express bus, bus rapid transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.”

PCT calculates the vehicle load factor by dividing the average passenger load by the number of seats on the bus used. PCT transit separates vehicle load factors into peak and off peak times according to time of

the day. The vehicle load factor has been monitored to identify service needs by capacity for certain periods and locations in order to ensure the safety and comfort of riders.

| Vehicle Type | Seats | Standees | Total | Maximum Load Factor at Peak | Maximum Load Factor at Off Peak |
|--------------------------|-------|----------|-------|-----------------------------|---------------------------------|
| 29' Low-Floor Diesel | 25 | 8 | 32 | 1.28 | 1.00 |
| 35' Low-Floor Diesel | 31 | 10 | 41 | 1.32 | 1.00 |
| 35' Long-Range Electric | 29 | 10 | 39 | 1.34 | 1.00 |
| 40' Short-Range Electric | 38 | 12 | 50 | 1.32 | 1.00 |

Vehicle Headway Standard –

Vehicle headway is described as follows by FTA Circular 4702.1B Chapter IV (4) (a) (2):

“Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., four buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15-minute peak headways and 30-minute off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For example, a service standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.”

During the peak winter and summer seasons, PCT provides regularly scheduled service with a maximum of 30 minute headways. During off peak seasons, spring and fall, PCT provides regularly scheduled service with a maximum of 60 minute headways. Express route services operate on 15 minute increments daily, year round.

Specifically, Park City strives to attain the following service frequency standards during peak service (in minutes):

| Service Corridor | Winter | Summer | Spring/Fall |
|------------------|--------|--------|-------------|
| 01 Red | 20 | 30 | 30 |
| 02 Green | 20 | 30 | 30 |
| 03 Blue | 20 | N/A | N/A |
| 04 Orange | 30 | 30 | 30 |
| 05 Yellow | 20 | 30 | 30 |
| 06 Silver | 20 | N/A | N/A |
| 09 Purple | 30 | 30 | 30 |
| 10 White | 15 | 15 | 15 |
| 40 Bronze | N/A | N/A | N/A |
| 50 Teal | 20 | N/A | N/A |
| Trolley | 15 | 15 | 15 |
| Citywide | 30 | N/A | N/A |
| PCHS Express | N/A | N/A | N/A |

On-Time Performance Standard –

On-time performance is described as follows by FTA Circular 4702.1B Chapter IV (4) (a) (3):

“On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed “on-time” window.”

PCT defines “on-time performance” as not early and no more than five minutes late. PCT seeks a standard of 90 percent for all fixed-route trips being operated “on-time.”

| Service Corridor | Winter | Summer | Spring/Fall | Annual Route Average |
|------------------|------------|------------|-------------|----------------------|
| 01 Red | 69% | 90% | 93% | 84% |
| 02 Green | 79% | 91% | 93% | 88% |
| 03 Blue | 78% | N/A | N/A | 78% |
| 04 Orange | 98% | 97% | 100% | 98% |
| 05 Yellow | 76% | 88% | 92% | 85% |
| 09 Purple | 94% | 93% | 96% | 94% |
| 10 White | 88% | 96% | 97% | 94% |
| 40 Bronze | 95% | N/A | N/A | 95% |
| 50 Teal | 78% | 73% | 18% | 56% |
| Trolley | 76% | 76% | 75% | 76% |
| Citywide | 94% | N/A | 96% | 95% |
| PCHS Express | 47% | N/A | N/A | 47% |
| Overall | 79% | 90% | 93% | 87% |

Service Availability for Each Mode –

Service availability/transit access is described as follows by FTA Circular 4702.1B Chapter IV (4) (a) (4)

“Service availability is a general measure of the distribution of routes within a transit provider’s service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distance might be a shorter distance than it would be in less densely populated areas, and the percentage of the total population within a one-quarter mile walk of routes or lines might be higher in more densely populated areas than it would be in less densely populated areas. Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.”

PCT’s goal is to maximize the area provided with transit service while maintaining minimum service efficiency standards. Park City provides service within one quarter mile of all major employment, medical, shopping, and institutional centers, and of all residential areas with four or more dwellings per acre. Major employment centers are defined as an industrial or commercial zone that employs 200 or more non-agricultural, non-construction employees.

N. SYSTEM-WIDE SERVICE POLICIES

Transit Amenities –

Transit amenities are described as follows by FTA Circular 4702.1B Chapter IV (4) (b) (1)

“Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable

distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this...applies after a transit provider has decided to fund an amenity.”

Installation of transit amenities along bus routes include, but not limited to the following criteria:

- Number of passenger boardings
- ADA Compliance
- Safety
- Adjacent land use

Shelters should be considered at all bus stops serving 30 or more passenger boardings per day. Seating should be considered at all bus stops serving 15 or more passenger boardings per day. Benches and shelters will only be installed on existing UDOT, Park City or Summit County right-of-way, except where written confirmation from the property owner can be obtained to install a bench or shelter on private property.

After review of the priority list by other public works staff, the Transit/Transportation Manager will contact adjacent property owners by telephone (with follow-up correspondence) to notify them of intentions to install a passenger amenity. This notice will detail the action being taken, projected milestones, and protest procedures available to the complainant. Adjacent property owners include all owners of parcels within a 50-foot radius of placement of the bus stop sign. If an adjacent property owner protests installation at the site, Park City Transit will not immediately install it until a protest proceeding is completed. However, if passenger boardings at that bus stop exceed 20 passengers per day for a bench or 60 passengers per day for a shelter, Park City Transit will begin proceedings to install the amenity while the protest is being processed.

In 2018, PCT executed a Bus Stop Accessibility Study to score the condition of all bus stops in Park City for compliance and overall effectiveness. On September 15, 2022, PCT presented to Park City City Council a three-year plan for amenity improvements of 72 bus stops. This plan was approved. Construction is expected to continue through 2024.

Vehicle Assignment –

Vehicle assignment is described as follows by FTA Circular 4702.1B Chapter IV (4) (b) (2):

“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. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.”

PCT operates four basic bus types on fixed-route service: (1) 29' diesel burning bus, (24) 35' diesel burning buses, (7) 35' electric buses with long-range batteries, and (6) 40' electric buses with short-range batteries. Vehicles are parked inside a locked facility, front to back upon pull-in, and are assigned by pull-out times the next morning, according to vehicle type. This practice provides for a random daily bus assignment.

PCT only restricts the use of the 29' diesel burning bus to the trolley route and the 40' electric buses with short-range batteries to the express route. The trolley route is restricted due to turning radius of the trolley end of line. The 40' electric buses with short-range batteries are restricted because of the need to charge at each end of line on the express. Other vehicle types will be dispatched on any route at random, as stated above.

APPENDIX A: TITLE VI COMPLAINT FORM

The complainant will use the following complaint form:

Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, national origin, or other protected class be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to Park City Transit P.O. Box 1480, Park City, Utah 84060 or 1053 Iron Horse Drive, Park City, Utah 84060.

1. Complainant’s Name: _____

2. Mailing Address: _____

3. City/State/Zip Code: _____

4. Telephone: _____

5. Email: _____

6. Person discriminated against (if other than complainant):

Name: _____

Address: _____

City/State/Zip Code: _____

7. Which of the following best describes the reason you believe the discrimination took place? Was it because of:

a. Race:

b. Color:

c. National Origin:

d. Other

8. What date and time did the alleged discrimination take place? _____

9. In your own words, describe the alleged discrimination. Explain what happened and whom you believe to be responsible. Please use additional sheets of paper if necessary.

10. List any others who may have knowledge of this event:

| Name | Address | City/State/Zip Code |
|------|---------|---------------------|
| | | |

11. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes: No:

If yes, check each box that applies:

- Federal Agency Federal Court State Agency
State Court Local Agency

12. Please provide a contact name at the agency/court where the complaint was filed:

Please sign below:

Complainant's Signature: _____ Date: _____

You may attach any written materials or other information that may be relevant to your complaint.

APPENDIX B: Título VI Denuncia Forma

El denunciante utilizará el siguiente formulario de denuncia:

Título VI Denuncia Forma

Título VI de la ley de derechos civiles de 1964 requiere que "ninguna persona en los Estados Unidos, por motivos de raza, color y origen nacional, se excluirá de la participación en, negar los beneficios de o ser objeto de discriminación en cualquier programa o actividad que reciba asistencia financiera federal."

La siguiente información es necesaria para que nos ayuden en el procesamiento de su queja. Si necesita cualquier ayuda para completar este formulario, háganoslo saber.

Completar y devolver este formulario a Park City Transit P.O. Box 1480, Park City, Utah 84060 or 1053 Iron Horse Drive, Park City, Utah 84060.

1. Su Nombre: _____

2. Domicilio: _____

3. Ciudad/Estado/Código Postal: _____

4. Teléfono: _____

5. El Correo Electronico: _____

6. Persona discriminaciónada:

Nombre: _____

Domicilio: _____

Ciudad/Estado/Código Postal: _____

7. ¿Cuál de los siguientes mejor describe la razón por la que creo la discriminación tuvo lugar? ¿Puede ser porque?

a. Raza:

b. Color:

c. Origen Nacional:

d. Otra:

8. ¿Qué fecha la presunta discriminación llevaron a cabo? _____

9. En sus propias palabras, describir la presunta discriminación. Explicar lo que ocurrió y a quien considera responsable. Utilice hojas adicionales si es necesario. _____

9. Lista de los usuarios que pueden tener conocimiento de este evento.

| Nombre | Domicilio | Ciudad/Estado/Código Postal |
|--------|-----------|-----------------------------|
| | | |

10. ¿Han presentado esta queja con cualquier otro federal, Estado o agencia local; o con cualquier tribunal federal o estatal? Sí: No

En caso afirmativo, comprobar cada cuadro que se aplica.

Federal Federal Tribunal Estado Agencia

Estado Tribunal Agencia Local

11. Proporcione un nombre de contacto en la Agencia donde se presentó la denuncia.

Por favor su firma: _____ Fecha: _____

Puede adjuntar cualquier materiales escrito u otra información que puede ser pertinente a su queja.

APPENDIX C: SELF ASSESSMENT USING THE FOUR-FACTOR ANALYSIS FOR LAP

SELF ASSESSMENT USING THE FOUR-FACTOR ANALYSIS

Park City Transit is a public entity that delivers transportation projects in Park City, Utah, including transit services and capital improvement projects. This section sets forth the Four-Factor analysis used to determine the appropriate, reasonable, resource effective and meaningful access for LEP persons. In determining “reasonable,” there are four factors to be considered:

Factor 1 - The Number and Proportion of LEP Persons Served or Encountered in the PCT Service Area

The first step of the four factor study includes an analysis of the 2020 Park City census data. This area includes Park City Municipal’s official boundaries. This area correlates directly with the Park City transit service area (referred to hereafter as the PCPTP), with a population of 8,107 people over the age of 5.

Statistical Language Breakdown

Source: 2020 ACS 5-year estimates

Of the PCPTP, census figures estimate that 24.5% of the population speak a language other than English. Of that, 19.6 % speak Spanish. Among Spanish speakers, 6.3% indicated that they speak English “less than very well”. Of the remaining 4.9% who speak a language other than English, 1.2 % speak an Other Indo-European language and 3.4% speak an Asian and Pacific Islander language. Of these two categories the amount that indicated they speak English “less than very well” is 0.0% and 0.1% respectively. (Information was obtained from the U.S. Census Park City, Utah– *Language Spoken at Home, 2020 American Community Survey 5-Year Estimates on 10/28/2022 – Attached*)

Factor 2 - The Frequency with Which LEP Individuals Come into Contact with PCT Services

In order to determine the frequency with which LEP individuals come in contact with transit programs, activities, and services, we look at results of the 2019 Winter and Summer Park City Transit Onboard Passenger Survey, which is the most recent on-board survey available. The survey was administered in both English and Spanish.

An important element of providing a successful public service is to clearly understand the “customers” – those persons using the service. To gain this understanding, PCT retained AJM & Associates to conduct onboard passenger surveys of the transit services provided by Park City Transit. Winter surveys on all fixed routes were conducted, March 21 through 24, 2019.

AJM & Associates were hired to conduct the on-board transit surveys. Approximately 1,100 unique surveys were recorded. Data collected from the on-board transit surveys helps Park City Transit improve service and quantify needs of riders.

Surveyors obtained completed surveys that were equal to 10% of riders for a typical day at the time of the survey. All passengers boarding buses with surveyors during the survey period were asked to complete a one-page questionnaire. The survey forms consisted of a single sheet with questions in English on one side and Spanish on the other.

The summer service survey was conducted in an identical method on July 18 through 21, 2019. Results indicated on a broad basis that Winter Service accommodated an estimated 11.9% of riders which could

be considered Spanish speaking LEP individuals. Of the Summer Service the survey indicated an estimated 12.9% of riders which could be considered Spanish speaking LEP individuals. (Source: Park City Transit Summer 2019 Onboard Passenger Survey, AJM & Associates, & Park City Transit Winter 2019 Onboard Passenger Survey, AJM & Associates.)

These results indicate that the amount of LEP ridership is greater than the ratio indicated in census data of the PCPTP.

Factor 3 - Nature and Importance of the Services Provided

Through the 2019 On Board Passenger Survey and 2020 US Census Data, it has been determined that while primarily a resort oriented transit system, the Park City Transit System also significantly services local population, including an LEP population in ways related to employment, education, and health services.

Factor 4 - Resources Available to PCT to Ensure Meaningful Access to Services by LEP Individuals

Park City Transit does not provide transit service to a population of over 200,000. The total estimated permanent transit population within the boundaries of the transit system is 8,396. The Park City Transit Department operates as an Enterprise Fund within the overall government of Park City Municipal Corporation. The system is managed as efficiently as possible within the structure of the available City and Transit Department resources. The Transit system operating budget is significantly small compared to large transit agencies. However, the transit system does serve a significant Hispanic ridership. The Transit system has contracted with a translation service agency to provide over the phone translation services as well as document translation services to ensure the availability of service information in Spanish.

APPENDIX D: RESPONSIBLE OFFICIALS APPROVAL

Responsible Officials Approval

This Title VI Program has been reviewed and approved by the following governing officials responsible for policy decisions within Park City Transit, a department of Park City Municipal Corporation.

Effective Date November 30, 2022

DocuSigned by:

Matt Dias

Matt Dias, City Manager

Attest:

DocuSigned by:

Matthew Neely

Matthew Neely, Transportation Director

Attest:

DocuSigned by:

sarah mangan

Sarah Mangan, Human Resources Director

Approved as to Form:

DocuSigned by:

Margaret Plane

Margaret Plane, City Attorney's Office