

What Does Utah's New Congressional Map Mean for Your Company?

by Troy M. Keller, Samuel Flitton, and Cloe Nixon

All businesses have a relationship with their congressional representatives, whether they are conscious of it or not. For some, due to the size or nature of their operations, this is a direct and proactive one. For others, it may be passive, perhaps even indirect through trade associations or state bodies that support or regulate business interests. Seen or unseen, a company's representative in Congress tends to be their most direct and influential tie to the massive power structure and policy-setting machine that is the U.S. federal government.

For many Utah businesses these relationships are likely to be impacted by an ongoing redistricting process in which the boundaries for Utah's Congressional Districts are being redrawn. Following months of litigation, on November 10, 2025, Utah Third District Court Judge Dianna Gibson issued an order determining that a map approved by Utah's legislature in October failed to comply with a 2018 voter referendum and adopted instead a map proposed by plaintiffs in the action (see Map 1 image below). While further litigation is to be expected, it is clear now that Utah will have a different congressional map for the 2026 midterm elections.

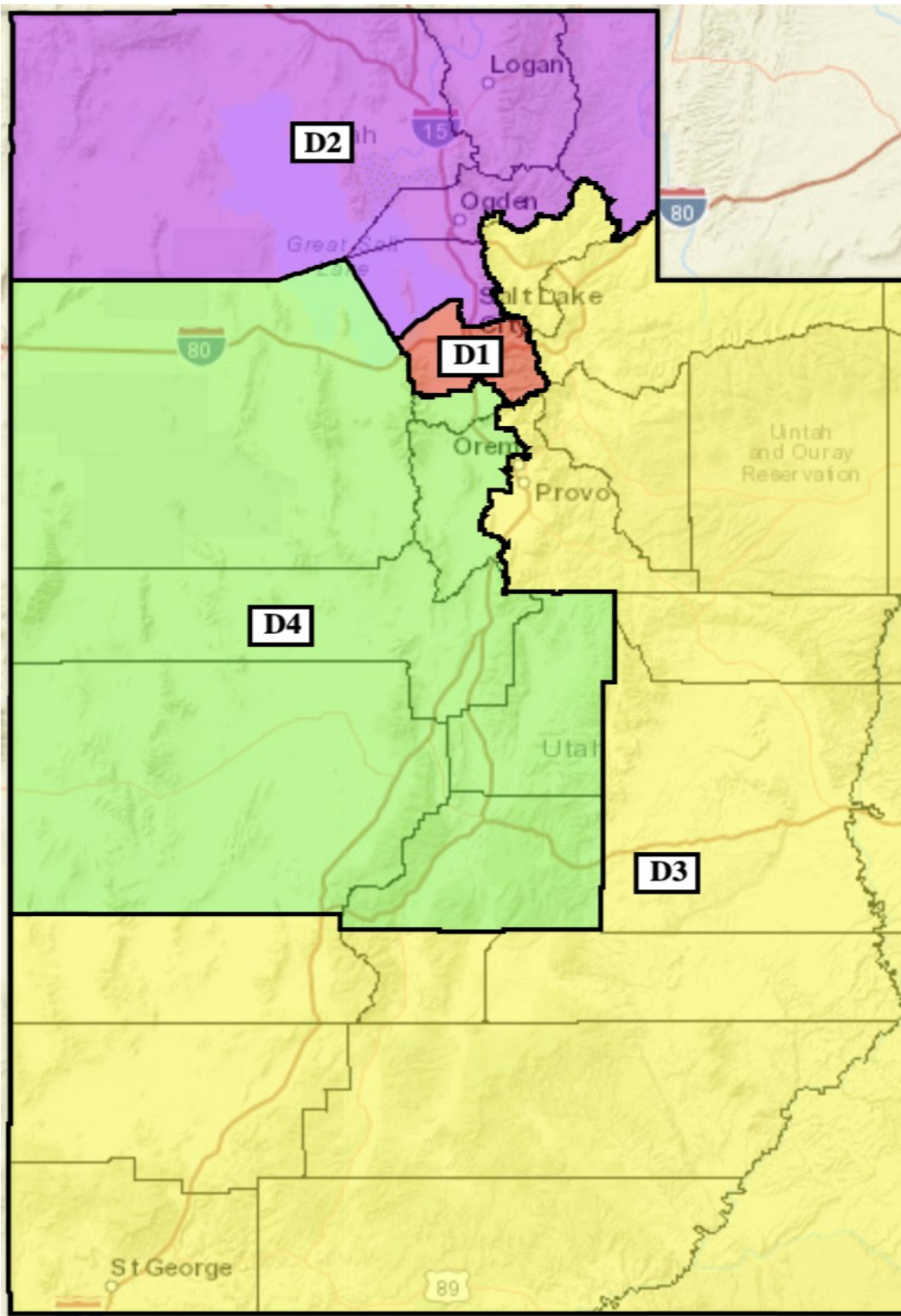
Most of the commentary and discussion on this highly unusual redistricting exercise has revolved around what the new map might mean *politically*. In other words, will Democrat candidates be more competitive in one or more of the districts as a result. This update takes a different approach. Here we provide a few thoughts on what the new map might mean for business and what steps companies might want to take as a result. Consider the following questions.

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1. Who will be my company's representative going forward? The answer to this question is unfortunately unclear. The 2026 Congressional District Map approved by Judge Gibson differs significantly from the 2021 Congressional District Map. Even in the unlikely event that each incumbent runs next year in their current district, the boundary changes alone would result in many companies falling in a different district. Another variable is that we are likely to see some switching of districts among the current incumbents. For example, Congresswoman Celeste Maloy (currently District 2) may elect

to run in the new District 3, which encompasses her home in Southern Utah and most of the rural counties that make up the grassroots base of her constituency. Representative Burgess Owens (currently District 4) would likely remain in District 4, though the new boundaries of this constituency look very different. Most uncertain is where Representative Mike Kennedy (currently District 3) may run, as the new map carves up his current district seat in a significant way. The only incumbent we can confidently say anything about is Representative Blake Moore, who is likely to run in the new District 2, which includes most of Northern Utah. For the rest of the state, however, the potential for shuffling among Districts 3 and 4, and new Democrat leaning District 1 comprising Salt Lake City, will create significant uncertainty going into the next congressional election.

2. If we end up with a new representative, what does that mean for our company's government relations strategy? For businesses that have been directly engaging with their congressional representative, having a new member going into the 2026 elections would require some modest recalibrations in their government relations strategy. We say modest because in our experience the Utah delegation works well together, and most issues that affect businesses in one district are relevant statewide. While it will be prudent for a company to connect with its potentially new representative as things unfold, it will also be reasonable for it to continue working ongoing issues with its current representative even if they may be running in a different congressional district next year.

Continuing to work with your current representative, even if your business finds itself no longer in their district, is also smart given the likelihood that we will see yet another congressional map for Utah soon enough (see more on this point below). As such, there is a very possible scenario where another round of redistricting leads to more shakeups in the delegation. Finding relationship continuity where you can is going to matter more than where the district lines are drawn at least during this transition period.

3. What does redistricting mean for committee assignments? While the particular make-up or needs of a district can have a bearing on its representative's committee assignments (for example, for obvious reasons Utah has usually had at least one representative on the Natural Resources Committee), assignments are not tied to a congressional district. Rather, the background and experience of a member often plays a larger role. Assuming most of Utah's incumbent representatives stay in office, we expect the Utah delegation to maintain in large part its current committee assignments. Of course, if redistricting and next year's elections lead to a new member for the delegation, that member will bring a new set of committee assignments. Whatever results, businesses ought to pay attention to the committees their representative and others in the Utah federal delegation sit on. These assignments both indicate what policy areas a member of Congress is likely to be focused on and where they may have the most influence.

4. Will Utah's congressional map change again anytime soon? In the ordinary course, Utah's congressional districts won't be revisited until 2031 after the decennial 2030 census. The current redistricting exercise was initiated by a voter referendum and ensuing legislative and judicial actions. It is possible this is now settled, but it will surprise

no one if further appeals and/or legislative and voter initiatives are taken up over the course of the next year. Stay tuned.

In summary, Utah's new congressional map is a meaningful change that is relevant for most businesses in the state of Utah. For companies located in the state, it will be important to stay close to developments to understand (i) who your congressional representative is likely to be as we move into 2026, (ii) what these changes might mean for issues that are important to your business, and (iii) how to best engage or reengage with your representative going forward.

Dorsey & Whitney's Law and Policy team is available to discuss questions and strategies.