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03 NOV 2023

Island Transit Board of Directors and Mister Todd Morrow  
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### **Cease and Desist Letter for Island Transit Route ITOD 2C**

As a long time and highly satisfied rider of the former Island Transit Route 2C which served the South End of Camano Island, I have carefully studied the replacement of Route 2C with ITOD 2C. Island Transit implemented Route ITOD 2C on 01 OCT 2023 and refers to ITOD 2C as an “on demand” service. Through informal conversations with riders, drivers and dispatchers it is clear that ITOD 2C is an unsatisfactory replacement for Route 2C.

With this letter I call upon Island Transit to Cease and Desist operation of ITOD 2C at the close of business 05 NOV 2023 and simultaneously reinstate Route 2C at the same level of scheduled service provided by Route 2C during September 2023. Additionally Island Transit is called upon to cease and desist replacement of any other scheduled routes on Camano Island with “on demand” until the serious safety and rider-service issues with Route ITOD 2C are resolved.

The reinstated Route 2C should stay in place until such time as Island Transit repairs and relaunches launches a version of ITOD 2C which meets the following minimum requirements:

1. A rider facing mobile and Web app that conforms to modern best-practices and fully satisfies 7.2.1 through 7.2.4 in the attached Legal Grounds document.
2. The two-hour-in-advance booking requirement is reduced to one hour or less with trips coordinated with arrivals and departures of Route 1C, 411C, 412C and 3C e.g. the same level of service to South End riders as Route 2C and parity with Route 1C.
3. The ability of on demand riders to register a “personal stop” located at a safe point directly on the route, such as their driveway or the end of their street. This would likely be the same point which the rider formerly used as their flag stop. This “personal stop” should be selectable in the app with a tap or click just as any one of the 41 scheduled stops can be selected.

Though Island Transit surely has a plan in place to remedy the myriad of daily operational issues it has with ITOD 2C, section 7 of this document presents a roadmap for a hybrid on-demand solution for ITOD 2C which will fully realize the rider service level, operating-cost reductions and environmental friendliness that Island Transit was likely seeking when ITOD 2C was first proposed.

Should Island Transit fail to take immediate action to remedy ITOD 2C consistent with this Cease and Desist Letter, a group consisting of riders of the former route 2C along with other interested parties and counsel are prepared to pursue this matter through the courts beginning with the petitioning of Island County Superior Court for an injunction codifying this Cease and Desist Letter as a court ordered Cease and Desist Order. In concert with the aforementioned injunction a lawsuit will be initiated seeking the three point remedy above, along with \$10,000 per day punitive damages commencing on 05 November and continuing until such time as all terms of said Cease and Desist Order are met.

The legal grounds for the petition for injunctive relief and accompanying lawsuit will include but are not limited to, breach of contract, discriminatory practices, negligence, reckless endangerment, misuse of public funds and fraudulent representations made to obtain public funding. A current list of the evidenced based allegations is presented herein.

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03 NOV 2023

Stanwood, Washington

**Legal grounds for the cease and desist letter by Ramon Diego Diego issued to Island Transit for ITOD 2C on 03 NOV 2023.**

1. Breach of Contract
  - 1.1 Breach of Contract - Level of service to riders.
2. Discriminatory Practices
  - 3.1 Discriminatory Practices - Paratransit passengers prioritized over “on demand” passengers.
  - 3.2 Discriminatory Practices - ITOD 2C riders treated differently than 1C Riders.
  - 3.3 Discriminatory Practices - Transportation Inequity for South End Residents.
3. Reckless Endangerment
  - 4.1 Reckless Endangerment - Designated Stop Requirement
  - 4.2 Reckless Endangerment - Flawed dynamic routing software implementation
  - 4.3 Reckless Endangerment - Flawed overall technology implementation
4. Negligence
  - 4.1 Negligence - ITOD 2C system planning
  - 4.2 Negligence - Procurement of On-Demand software
  - 4.3 Negligence - Implementing and maintaining existing technology
    - 4.3.1 Technology - Failure to provide technology leadership
    - 4.3.2 Technology - Failure to properly implement and maintain technology asset
    - 4.3.3 Bus location reporting
  - 4.4 Negligence - Driver Training for “On Demand” Software
    - 4.4.1 Training - Driver confusion with “on demand” pickup policy
    - 4.4.2 Training - Ongoing lack of uniformity in driver pickup procedures
    - 4.4.3 Training - Unfamiliarity or lack of confidence in the navigation screen
    - 4.4.4 Training - Unfamiliarity with beginning of shift procedures
    - 4.4.5 Training - Misunderstanding of “negotiated time” and the “arrive” operation
    - 4.4.6 Training - Unfamiliarity with the term ITOD 2C
  - 4.5 Negligence - Failure to implement standard, software-provided driver aids
  - 4.6 Negligence - Failure to properly calculate driver pay
  - 4.7 Negligence - Designated-stop markers not installed.
  - 4.8 Negligence - The Parable of the Trees
5. Fraud
  - 5.1 Fraud - Deceptive representation of ITOD 2C as a modern, on-demand service.
  - 5.2 Fraud - Deceptive representation of the Island Transit “Go App” as a usable app.
  - 5.3 Fraud - Comparison of Island Transit “on demand” to true on-demand services.
6. Misuse of Public Funds
  - 6.1 Misuse of Public Funds - Technology
7. Fixing ITOD 2C
  - 7.1 Fixing ITOD 2C - Roadmap

## 8. Summation

### 1. **\*\*Breach of Contract\*\***

Breach of contract is the failure of one party to deliver or provide something promised to another. The contract can be a formal document agreed upon and signed by both parties and it can be a simple oral agreement. Contracts can also be implied through representations made in marketing materials, proposals and through long-standing precedence.

#### 1.1 **Breach of Contract - Public Safety and Level of Service to Riders**

Island Transit is a publically funded transit district which has promised to provide a certain level of service to the public on Whidbey and Camano Islands in exchange for its public funding. For twenty years Island Transit has fulfilled its contract with riders of Route 2C on Camano Island in an exemplary fashion. The extent to which Island Transit has consistently gone to serve all of its riders with safe, reliable and friendly service is legendary.

The recent conversion of Route 2C to ITOD 2C represents a breach of contract, both stated and implied regarding level of service and safety. This breach is evidenced by the deficiencies, sub-standard practices and public safety issues detailed in Section 2 through Section 6 of this document.

### 2. **\*\*Discriminatory Practices\*\***

Discrimination is the treatment of one group or people differently than another. There exists significant legal precedence prohibiting discrimination by publicly funded entities. In the 1950's transit companies in the Southern states forced black passengers to sit in the back of the bus. In 2023 Island Transit has thrown South End riders *under* the bus.

#### 2.1 **Discriminatory Practices - Paratransit passengers prioritized over "on demand" passengers.**

The former Route 2C serving South Camano Island was a rural flag stop route wherein a rider could "flag" a ride on an hourly basis by simply positioning themselves at any safe spot on the 21 mile route loop and get a ride. Upon implementation of ITOD 2C, the former Route 2C is now a combined "on demand" and paratransit service, a practice known as co-mingling.

Paratransit riders are picked up at their driveway. If they are not present where the bus arrives the bus will wait for them throughout a prearranged window of time. If the rider does not appear within the window of time, the driver must call dispatch and get authorization before marking the rider as "no show" and continuing their route.

"On demand" passengers boarding the same bus and with the same driver, one stop before or after the paratransit stop are treated differently. An "on demand" rider must wait for their bus at one of the assigned stops, beginning at the window of time for their assigned "pickup". The "window" represents the anticipated arrival time of the bus and is typically ten minutes. If the bus arrives within the "window" and there is no rider present, the specified procedure is for the driver to perform an "arrive" operation on their bus-mounted device, followed immediately by a "passenger not located" operation and to then go on to their next stop. There is no grace period for the rider to be present at the stop. If the bus arrives 1 second within the window and does not see a rider, the driver must "arrive" the trip, no-show the passenger and proceed to the next



stop on their itinerary. Drivers are instructed to treat a non-present “on demand” rider just as if it were a scheduled stop with no person present. Requiring an “on demand” passenger to be at an established stop throughout a ten minute or more period or lose their opportunity to ride, while allowing a paratransit passenger five minutes or more of time to first appear from the comfort of their home is a discriminatory practice.

While the treatment of “on demand” riders is discriminatory and favors the paratransit rider, the requirement for an on demand rider to be waiting for their bus is entirely reasonable. What is unreasonable and unacceptably discriminatory is the practice of forcing “on demand” passengers to wait for their bus at arbitrarily assigned stops instead of the usual flag stop they have been using for twenty years. Island Transit is using the same software for “on demand” passengers as they are for paratransit passengers. This software is capable of directing the driver to any location within the service area. To deny the “on demand” rider the same “personal stop” feature of the software, as afforded the paratransit passenger, is discriminatory, punitive and further relegates the ITOD 2C passengers to fourth tier status.

The paratransit management software and rider-facing booking app used for their “on demand” passengers, by definition, accommodates any address within its area of operation. In the case of an “on demand” rider who’s driveway or street is directly on the former Route 2C and had been flagging the bus at their driveway or the end of their street for twenty years, that same spot could be registered as an “on demand” personal stop with a couple taps on a modern, standards based app. Statistically these registered personal stops could save time and money for Island Transit in instances where they are closer to Terry’s Corner or the next stop on the itinerary, than the assigned stop, a stop which might be a mile further down the road. At the very least such personal stops would ensure the same level of rider service and safety that Island Transit has established and maintained over twenty years and at zero additional cost of operation.

Zone 2 “On demand” passengers are further discriminated against by virtue of Island Transit prioritizing paratransit riders in the Ecolane routing software. The two buses dedicated to co-mingled paratransit and “on demand” passengers are frequently dispatched outside Zone 2 solely to serve paratransit riders. A trip cannot be shared between a “on demand” passenger and a paratransit passenger if the paratransit passenger is traveling outside Zone 2.

In the first three weeks of operation of ITOD 2C the following situation happened to the same ITOD 2C passenger three times: The passenger boarded the 3C “town” bus in Stanwood and traveled to Terry’s Corner in order to board their previously booked ITOD 2C ride to the South End of Camano Island. On each of these trips the passenger was informed they would be traveling back to Stanwood first to pick up a paratransit rider. Ironically in all three cases the paratransit rider was at the Everett Clinic, directly across from the stop where the “on demand” passenger had caught the bus out to the Island 30 minutes earlier.

## **2.2 Discriminatory Practices - ITOD 2C riders treated differently than 1C Riders.**

The Camano Island counterpart to the former scheduled 2C route is 1C. Route 1C still serves the more affluent West side of Camano Island. The central, West side of Camano Island served by 1C has a preponderance of higher property values than the more rural and inaccessible South End area served by the ITOD 2C.

Route 1C riders continue to enjoy the same hourly flag service that they always have with convenient connection to off island routes 3C, 411C and 412C, built into their scheduled service. In actuality they enjoy a higher level of service than before the implementation of ITOD 2C. West buses are now seldom or ever diverted to assist with paratransit. Also, the Cama Beach stop has been assigned to ITOD 2C so Route 1C passengers will no longer have their bus diverted to Cama Beach.

### **2.3 Discriminatory Practices - Transportation inequity for South End residents.**

With the implementation of ITOD 2C, South Camano residents have now been relegated to fourth tier access to transportation.

Tier	Area	Result
1 - Paratransit	All of Camano Island.	Door to door service as far as Stanwood. Buses will wait for the rider to be ready.
2 - Double Dippers	From "Windermere" to Terry's Corner hub.	A short, easy, well-lit walk from South Camano and Elger Bay road areas allows these riders to have "on demand" service from ITOD 2C as well as hourly flag service on Route 1C.
3 - Route 1C	The economically advantaged North End of Camano Island.	Route 1C riders enjoy a higher level of hourly service than before ITOD 2C by having the Cama Beach stop removed from their route and seldom if ever aiding with paratransit.
4 - ITOD 2C Riders	The more isolated and comparatively lower property value area of South Camano Island.	Former hourly flag service has been reduced to a mandatory two hour advance notice "on demand" service with a ten minute wait-time window at a possibly distant designated stop. Zone 2 buses and drivers are diverted for pickup and drop off of paratransit riders outside of Zone 2.

In times past the 1C West bus would have made a minor route diversion, picked up the West area paratransit passenger then transferred them to a 3C "town" bus at the Terry's Corner hub. Instead both ITOD 2C buses were out of the Zone 2 area handling paratransit passengers leaving no route availability for Zone 2 "on demand" riders. This is a discriminatory practice that relegates Zone 2 riders to a fourth tier status below 1C riders and paratransit riders and does not contribute to the operational efficiency or environmental friendliness of ITOD 2C.

### 3. **\*\*Reckless Endangerment\*\***

For the purpose of this document “Reckless Endangerment” means to endanger the public by way of requirements and policies that could reasonably be foreseen to put the public in harm’s way.

#### 3.1. **Reckless Endangerment - Assigned stop requirement.**

As described elsewhere in this document, the former Route 2C was a flag-stop service whereas ITOD 2C has assigned stops. The assigned stops are along a 21 mile loop that does not have a single foot of sidewalk and very little walkable-shoulder. There are only a handful of street lights in this isolated and heavily treed rural area. During winter months, up to six hours of Island Transit’s operational day takes place in the dark.

Passengers on the former Route 1C who for twenty years have flagged an almost-always-on-time hourly bus at the end of their street or driveway must now make their way to a stop up to a 2 miles distance from their customary flag stop, in the dark, without benefit of street lights or sidewalk. The tragedy of this requirement is that the paratransit oriented technology being used to conduct Island Transit’s “on demand” service will easily accommodate the former flag stop as a “personal stop”. In many cases “personal” stops will be closer to the Terry’s Corner hub, or to the next stop of a given “on demand”/paratransit run than the newly designated stop, thus saving Island Transit time and money as well as promoting passenger safety.



Image 3A

Image 3A is a photo of East Camano Dr during the winter morning operational hours of ITOD 2C. The newly installed Island Transit route marker is on the far left of the frame, between the real estate sign and the edge of the frame.

Almost all of the now 30 mile ITOD 2C loop is rural, heavily treed with no sidewalk. There are 11 street lights on the 11 miles of East Camano Road, five of the 11 being at the junction of East Camano Road and Elger Bay Road.

This is an accurate representation of the conditions faced by riders who were formally picked up at their driveways or the end of their street and must now walk, in some cases more than a mile to get to the arbitrarily designated ITOD 2C pickup points. The designated stop system imposed by ITOD 2C endangers riders and can not be shown to make ITOD 2C more efficient or environmentally friendly by any metric.

### **3.2 Reckless Endangerment - Flawed Dynamic Routing Software**

The route-management and bus-mounted device software employed for ITOD 2C appears to be paratransit software that has been pressed into service for “on demand” service. It is common for an ITOD 2C driver to have the list of times and stops on their bus-mounted device to change during the route. While on the road, a driver may glance at his screen one moment and see that he is on time and nearing his next pickup then glance again 15 seconds later and find a stop has been added to his itinerary or the order of the stops have changed. At this point the driver may realize that he or she is now driving in the opposite direction of their newly added pickup and are running late This necessitates U turns and other such maneuvers on narrow rural roads, usually without shoulders and often in the dark.

### **3.2 Reckless Endangerment - Failure to provide drivers required “pickup” information**

ITOD 2C riders are bound by a period of time that they must be present at the designated stop in order to board the bus. This period is referred to as the “pickup” window.

When local conditions allow them to do so safely, drivers are obligated to board the passenger within the “pickup” window. If the passenger is not present at the designated stop, and the bus has arrived even one second into the “pickup window” the driver is instructed to perform an “arrive” operation, a “passenger not located” operation and to immediately proceed to their next stop. This is as it should be. No passenger, no ride.

Incredibly, as implemented by Island Transit, the main screen of the Ecolane software does not show the driver the “pickup” window start and end times. Instead it displays a “negotiated” time that, depending on current route status, may be anywhere within the window. A driver arriving at a stop prior to the “negotiated” time with no rider present, can not readily know if they are within the “pickup” window or not. The rider’s app shows their precise window. Dispatch can see the precise window. The driver is not shown window times.

Not having the pickup window times clearly displayed when arriving at a stop without a passenger present, necessitates the driver maneuvering their bus to a safe, off highway location or staying positioned in the travel lane with their four-way lights on, while contacting dispatch by radio to ask if they are within the window and can therefore no-show the passenger and move on. Each of these three choices, moving to a side street, sitting in a travel lane with the four-ways on and even talking on the radio, exposes the bus and driver to additional and

unnecessary maneuvering or distraction, possibly in the dark on narrow streets without shoulders. Failing to provide the driver with required information at a glance, information needed to perform their job is, in the context of this example, reckless endangerment.

#### **4. \*\*Negligence\*\***

Negligence is the failure to take proper care in the performance of some activity. If an employer were to have workers on an elevated work platform and failed to provide safety rails around the work area, that failure would be negligence. If a worker were to fall from the platform and die when that fall might have been reasonably prevented by a proper safety rail, the employer would be criminally negligent.

As evidenced in Section 4.1 through 4.5 Island Transit has been negligent in their implementation of ITOD 2C.

If an elderly single-woman pulling her two wheeled grocery cart to the new ITOD 2C designated stop, a mile away from her former flag stop, in the dark, without benefit of sidewalk or street lights, in the winter, were to trip and fall into the roadside drainage ditch and perish from exposure before being discovered days later, Island Transit would likely be held, as in the guardrail example above, criminally negligent. Island Transit will have caused that woman to be at peril unnecessarily.

Island Transit has the built-in capability to assign personal stops in their Ecolane software and has purposely chosen to not make that feature available to “on demand” riders. Island Transit has established a twenty-year precedent of providing any-place-on-the-route-we-can-safely-stop flag stops for rural Camano Island and in fact continues to do so for riders in the more affluent North End of the Island. It is conceivable in the example above, the elderly woman’s twin sister would not be at risk of a similar fate as she is picked up for grocery shopping at the end of her driveway which intersects Route 1C.

As a tragic sidebar, it is worth noting that the Island Transit project manager known as Brian, who was tasked by Island Transit management with implementing ITOD 2C, was presented with the elderly woman scenario during a conversation with an ITOD 2C rider. The project manager responded with: “We are not Uber.”

Indeed.

#### **4.1 Negligence - ITOD 2C system planning**

Island Transit has shown negligence in researching, planning and specifying and executing precise requirements for its “on demand” system. Island Transit is negligent in not holding their vendors and contractors accountable for delivering an “on demand” system that meets the needs of its users and includes the features common to On-Demand Transit. ITOD 2C, in its present form, is a failed experiment.

#### **4.2 Negligence - Procurement of On-Demand software.**

As best as can be determined in advance of discovery, Island Transit failed to go through a formal procurement process to acquire route management software designed and proven for a designated-stop On-Demand system. A designated stop system has different operating

parameters, route management software requirements and customer facing app needs than applications such as neighborhood point-to-point transit or paratransit.

Procuring software for a complex on-demand system would typically require a formal Request for Quotation process which specified well thought out, best practices requirements for the software.

Instead of a formal procurement process it appears Island Transit is attempting to adapt their existing Ecolane paratransit software for “on demand” route-management along with a laughably flawed passenger-facing app called “Island Transit Go”. Island Transit is attempting to pass off this ill fitting technology hodge podge as a safe, efficient, “on demand” system which adequately serves the needs of riders and satisfies the requirements for its funding. The plummeting daily rider count of former Route 2C riders and vocal satisfaction from riders and drivers evidences the failure resulting from their negligence in planning and execution.

### **4.3 Negligence - Implementing and maintaining existing technology**

#### **4.3.1 Negligence - Failure to provide technology leadership**

Safely and efficiently operating a complex system such as a regional transit agency in today’s environment requires well chosen and finely tuned information systems. In my conversations with Island Transit I have heard no references to nor have I been put in contact with a Chief Technology Officer or other knowledgeable person who leads and is accountable for their technology procurement, use and maintenance.

I have talked to Island Transit ITOD 2C supervisors and managers who make statements such as:

“I will ask the IT guy.”,

“I think the driver just has to park the bus in the right spot in the yard and it usually works.”,

“The vendor told us it can not do that.” ,

“I think my supervisor is working on that.”,

“It’s probably a connectivity issue.”

The Island Transit pers I have not talked to is the Information Systems leader. Someone who understands and is accountable for the complex technology mix that ensures Island County routes are operated in a safe and efficient manner. It does not appear that there is such a person or position at Island Transit.

#### **4.3.2 Negligence - Failure to properly implement and maintain technology assets**

The predictable result of neglecting to properly implement and maintain technology assets is the failure of essential systems. Island Transit has neglected to fix failures and shortcomings in their technology infrastructure before adding the additional stress of ITOD 2C “on demand” service.

#### **4.3.3 Negligence - Bus location reporting**

Though a standard feature on modern systems, location tracking and reporting does not work at Island Transit. When asked by riders “Has my bus already passed my stop” dispatchers are forced to say “Just a minute, I will call them on the radio” When a driver makes a radio call to dispatch for assistance the dispatcher must ask “Where are you?”

There are three components to modern mobile location tracking services.

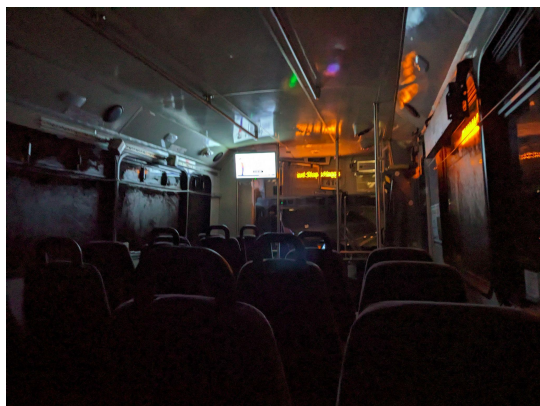
The first component is the Internet based server that receives frequent location reports from mobile units. This server may also be responsible for providing itineraries, updates and messages to the mobile units. The server can then be queried by a client for the current location of any mobile unit. Examples of clients would be a Web browser map for dispatchers that shows the current position and past track of any or all units or a customer app that has a “Where’s my bus?” function.

The second component of a mobile location tracking system is a commercial quality GPS receiver with roof mounted LNA (Low Noise Amplifier) antenna. Unless a bus is in a long tunnel, properly installed and maintained mobile GPS equipment will be able to acquire an accurate position “fix” to within a meter or two at all times. These locations are in turn fed to the route management software or GPS driven location announcement signs.

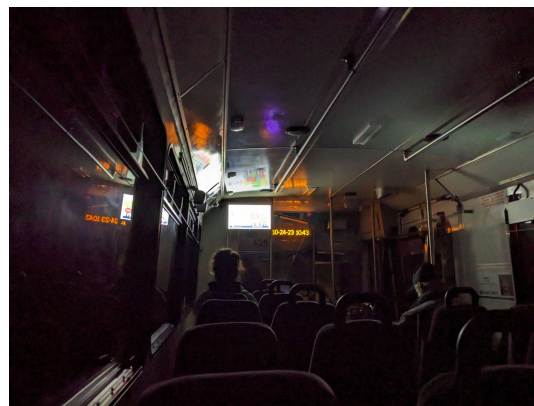
The third component to mobile location tracking is the reporting of the information through the cellular network. This is the tricky bit. With routes as wide ranging and rural as Island Transit’s, there will always be areas that do not have cellular coverage. Properly designed mobile software will circumvent cellular connectivity issues by downloading its itinerary at the beginning of a shift, thus providing functionality for the driver by relying on the bus’s GNSS position.

Most of the time the mobile route software will send location update messages directly to the network server every few seconds. While passing through cellular “dead zones” the software will store its acquired data then report that information and update itself with any itinerary changes or dispatch messages as soon as it is able to resume a cellular connection.

During the operational day of a public transit bus there are a multitude of ways that accurate, real-time GNSS information makes for a safer and more efficient system, from guiding an “on demand” driver to a seldom-used, designated stop in the dark, (using a moving map and optional audible prompts), to instantly sending dispatchers alerts with accurate location information should there be an accident or an emergency assistance request.



This “Next Stop” reader board showed “Terry’s Corner” for most of the trip to Skagit Station. On the trip back it suddenly changed



After transferring to the 7:40 PM “Express” bus at Terry’s Corner the same passenger noticed the reader board on the second bus



to “Rite Aid” - as the bus was traveling over the bridge to Camano Island. Rite Aid was four miles away.

showing no stop arrivals and a time of 10:43 PM, exactly 3 hours (or two time zones) off.



The reader board states Stanwood Park and Ride II which is 4.1 miles East of the Bud Hut seen through the windows on the right of the coach.

Reader board displaying 10:42 at 7:42 PM. Presumably Island Transit has not set the correct time zone for the device.

It is common for the new GNSS (Global Navigation Satellite System), driven “Next Stop” reader board signs to not work correctly. Sometimes there are audible announcements made by a pleasant female voice with an Australian or British Accent that uses quaint pronunciations for local stops. Sometimes there are no audible announcements. The locations displayed are not reliable. In the instance illustrated with photographs above, if an inattentive passenger or a visitor unfamiliar with the area read the location announcement, thought they were at their stop, pulled the stop request cord and got off, they would have found themselves at the Bud Hut on 532 instead of the stated Stanwood Park and Ride II.

#### **4.4 Negligence - Driver training for “on demand” software**

By and large Island Transit drivers are among the best selected, trained, competent and friendly in public transit anywhere. Sadly, in the chaotic rollout of its “on demand” system Island County management has thrown good drivers into a highly flawed system and have expected them to deliver the same safe, friendly service they always have.

##### **4.4.1 Driver confusion with “on demand” pickup policy**

On various ITOD 2C trips, made by a daily rider in the first three weeks of operation, it was observed five different driver’s did not know the correct procedure for making an “on demand” pickup. Each of these drivers were under the impression that they needed to wait for “on demand” riders until the expiration of the “arrival window” and then were to call dispatch before continuing on their route.

##### **4.4.2 Ongoing lack of uniformity in driver pickup procedures**

In the fourth week of operation, there remains non-uniformity in the pickup procedure executed by drivers. Some drivers wait for “on demand” passengers that are not present at the stop during the “pickup” window of time. Others “no show” non-present passengers, as they should,



and move on. Drivers are not prompted by the Ecolane software on arrival as to the procedure nor is it evident to dispatch if a driver is not following the established procedure.

#### **4.4.3 Unfamiliarity or lack of confidence in the navigation screen**

It was witnessed that a driver had an additional pickup added to their route while in transit. The driver did not or could not activate a navigation screen to take them to the new location. A passenger who heard the name of the street that the driver was trying to get to used Google Maps on their personal phone to direct the driver to the last minute stop.

#### **4.4.4 Unfamiliarity with beginning of shift procedures**

On a recent trip a driver did not know to perform a “pull out” operation following their “log on” operation. As a result riders were not notified that their ride was in transit. The driver could not perform “arrive” or “rider on” operations. At the next stop, while still trying to identify the issue with their device the bus crept forward as another vehicle was passing. A rider alerted the driver of the danger. More tragically, this bus was on the road and dispatch was not alerted by their software system of the issue.

#### **4.4.5 Misunderstanding of the significance of “negotiated time” and “arrive” operation**

A driver did not know to perform an “arrive” operation as soon as they arrived at an “on demand” pickup. They instead waited till the “on demand” passenger presented themselves, towards the end of that passenger’s pickup “window”, before “arriving” and “boarding” the passenger.

#### **4.4.6 Unfamiliarity with the term ITOD 2C**

On a recent day at the Terry’s Corner hub, a passenger with a reservation for a ride into Zone 2 was boarded by the driver then informed there was a second passenger on this run and they would have to wait. After a period of time the “second” rider did not appear and the driver contacted dispatch. The driver insisted that the information on his bus-mounted device showed there were two riders expected for this trip. When asked to read out what he was seeing on his screen the driver said “...ITOD 2C...that means 2 customers, right?” ITOD 2C is the name of the route and the device was showing indicating there was 1 passenger for route ITOD 2C. This is a forgivable mistake for a driver forced to alternate between flawed Ecolane and Route Match software through a single shift, The incident though trivial underscores the haphazard and negligent manner in which Island Transit has deployed a highly flawed “on demand” system.

Though individually none of the above issues are significant, they are together emblematic of the negligent manner in which Island Transit has implemented ITOD 2C.

#### **4.5 Negligence - Failure to implement standard, software-provided driver aids**

As implemented, Ecolane software does not alert drivers if they are off route or have arrived at an incorrect stop. It has been witnessed for a driver to wait five minutes for a paratransit pickup to appear from a house that was five miles from the correct pickup point, without the driver screen giving any indication to the driver that they were at the wrong place. When contacted by radio for further instructions, dispatch had no knowledge of the error but were eventually able to get the driver to the right location. Dispatch’s first question to the driver was ‘Well, where are you?’ It turned out that the paratransit riders at the correct and incorrect stops had the same name. Properly designed and implemented software would have alerted the driver and dispatch that the bus was holding at the wrong stop.

Lack of real time route oversight is a common issue with Island Transit. Every Island Transit driver on Camano Island has a story about the day they ran the wrong route, in some cases driving as far as Everett or Mount Vernon, before discovering the mistake on their own. The Route Match software on the scheduled service buses did not alert the driver or dispatch about the off-route travel.

#### **4.5 Negligence - Failure to properly calculate driver pay.**

On the pay period paid on or about 30 October 2023, ITOD 2C drivers discovered they had been “shorted” a significant amount of pay. In situations where an “on demand” driver had been cross-utilized for dispatch or training duty, they had been paid the hourly “bump” or increase in pay for that activity but not the ITOD 2C “base” pay that the “bump” was calculated on. For example, if they were to receive \$1.00 more per hour for training, they got paid the \$1.00 more but were not paid for the ITOD 2C hour. Though Island Transit paid their drivers once this was brought to their attention by the drivers, it is symptomatic of the chaotic, haphazard manner in which Island Transit has implemented their ITOD 2C “on demand” service and an example of their overall tenuous understanding of their information systems.

#### **4.6 Negligence - Designated-stop markers not installed.**

The impact to rider service and safety has been discussed elsewhere in this document. There is irony in the fact that assigned stops are rigidly enforced for “on demand” service but three weeks into service only 8 of the 48 stops in the system are marked. Furthermore none of the markers reference ITOD 2C or provide any instruction on how to get a ride. They provide a phone number without instructing a potential rider to call Camano Island dispatch. They provide the Camano Island Web site but not instructions as to how to navigate down three layers into the site menus to find the ITOD 2C booking form.

Zone 2 Pickup and Dropoff Points	48
Newly Marked Points Appearing on 23 OCT	10
Marked Points adopted from Route 2C	5
Unmarked Pickup and Dropoff Points	33

There does not appear to be any rhyme or reason for the stops that Island Transit has marked. For example there is a marker at the designated stop at East Camano and Dallman Road but none at the corner of West Camano and Dallman Road.



E Camano Dr and Dallman Rd - Marker



S Camano Dr and Dallman Rd - No Marker

In late October a passenger was standing at the newly marked stop at Dallman Road and East Camano in the early morning darkness. The bus passed by the rider, turned and traveled down Dallman to the former flag stop used by several riders in the neighborhood.. The former flag stop is a demonstrably safer location for the bus and the passenger than stopping in a travel lane of East Camano. When the rider caught up with the waiting bus and boarded he asked the driver how he liked the brand new marker over at the corner. "Never saw it." replied the driver.

Equally mystifying as the installation of some stop markers but not others on ITOD 2C is the marker at the corner of East Camano and Tamarak road. Tamarak road is between stops 35 and 36 on East Camano Road but does not appear on the published stop map or list and is not accepted by the Island Transit Go App as a valid pickup or dropoff point.





The mystery stop marker at East Camano Road and Tamarak Road. East Camano Road and Tamarak Road does not appear on the route map or route list and is not accepted in the Island Transit Go App as a valid stop.

#### **4.7 Negligence - The Parable of the Trees**

There were once ornamental trees and other plants in beautiful pots at the Terry's Corner bus stop. The ornamental trees were pleasing to look at and mature and the pots of a fine quality. The rulers of Terry's Corner bus stop had invested the people's money well. The trees and plants and ornate pots made the bus stop a more welcoming place. They demonstrated the Ruler's commitment to the village and Mother Earth.

But the facilities people in charge of maintaining the facility did not water the trees or plants nor did they weed their pots. Often passengers would bring water to the trees in plastic bottles but it was not enough. The brilliant green needles of the trees began to turn brown. The flowers on other plants fell away.

One day an old man waiting for his bus grew distraught about the slowly dying trees. The old man used his magic picture box to talk to the nice Lady of Terry at the bus camp a few valleys ladyaway. The Lady of Terry was always concerned about the travelers on the buses. For many hundreds of moons she had made sure travelers on her buses always got home. Surely she could get someone at the bus camp to water the trees.

"Please have someone water the trees at Terry's Corner, Lady of Terry." he said.

"I will!" Lady of Terry said.

But the trees were not watered.

Three days hence two facilities men came to Terry's Corner. The two facilities men had come from the bus camp several valleys away in the big white wagon to empty the trash cans at the bus stop, most of which were already empty. And to stand and talk and laugh and tell stories to the off duty drivers. The facilities men boasted and joked about what little work they had to do.

An old man, one who had brought water to the trees, walked up to the facilities man that used to be a firefighter and said to him:

"Why don't you water the trees? Did the nice lady at the bus camp tell you about the trees?"

Surely a firefighter would know things about water he thought.

"We don't have any water here" said the facilities man who used to be a firefighter.

"It's not our job. We have other things to do. We are busy facilities men." said the facilities man who did not used to be a firefighter.

"Do you have water and buckets at the bus camp several valleys away where the empty trash bags go?" said the old man waiting for his bus.

"Of course we do." said the facilities men. "Anyway we are getting new trees so there's no reason to waste our time on these trees."

"But these trees are still alive and with water will come back strong and green. If you have not taken care of these trees, how can I believe you will take care of new trees."

"It's really none of your business what we do." said the facilities man who did not used to be a firefighter.

The old man began to cry for the trees. Then he became enraged at the injustice of the facilities men not caring for the facility they were in charge of maintaining. But his tears were not enough.

The old man picked up his magical picture box that allowed him to talk to others many valleys away and asked to speak to the Earl in charge of the bus stop.

"Why do you not water the trees at Terry's Corner? Did not the nice Lady of Terri tell you about the trees." said the man to the Earl of Troy.

"We're getting new trees." said the Earl of Troy.

"But what about these trees?" said the old man. "I could adopt and care for them." the old man added.



“I don’t care about the trees. And it's not my job anyway.” said the Earl of Troy who seemed to have other things to do.

“May I speak to the person who is responsible? Perhaps a person that cares.” said the old man.

In a matter of moments the old man was speaking through his magic picture box to another more important Earl on the Big Island across the wide water.

“Please water the trees at Terry’s Corner” said the old man to the more important Earl across the water who had taken the name Clay of the Earth.

“I did not know the trees were dry!” said Clay of the Earth. “We will get right on that!”

And they did get right on it. The trees and plants and beautiful pots were stripped away during the night leaving bare concrete.

And trees and plants and the butterflies that visited them, and the smiles on the passengers that viewed them, were never, ever, ever seen again at the Terry’s Corner bus stop.

The End.



The Parable of the Trees is emblematic of the manner in which management at Island Transit has operated from the beginning. Things, be they trees or technology, that become problems are ignored. If brought to their attention, weak excuses are made and the problem left to others, be they drivers, dispatchers or passengers, to deal with on a daily basis. As long as Island

Transit management can paint glowing pictures of what could be in the future, they seem to believe no one will notice that the present in which they are standing is dark.

If Island Transit management does not have the time or talent to fix and maintain what they have, now how are they going to have the time and talent to fix what they buy or implement next?

## **5. \*\*Fraud\*\***

In the context of this document, fraud is the wrongful representation of something for financial gain. The infamous financier Bernie Madoff died incarcerated in federal prison because he represented a ponzi scheme as a legitimate investment. I wish no prison time for Island Transit management, that would prevent them from fixing ITOD 2C, however the analogy holds true. Island Transit's Route ITOD 2C "on demand" service is to legitimate, modern On-Demand transit as Mister Madoff's ponzi scheme was to a legitimate investment. ITOD 2C in its present form is a fraud.

### **5.1 Fraud - Materially deceptive representation of "on demand" transit used to secure public funding.**

In response to criticism of its "on demand" system, Island Transit management has formed a unified front with the consistent response being: "On demand is the coming thing in Public Transit." And: "It is working in other places. People like it."

Through my research I have found that these comments ring true. The concept of on-demand makes sense in some instances and public-transit operators in many metropolitan areas seem to have successfully implemented their local versions. In contrast, as implemented by Island Transit management, ITOD 2C "on demand" is a failed experiment that unnecessarily endangers riders and has caused ridership from the South End to plummet.

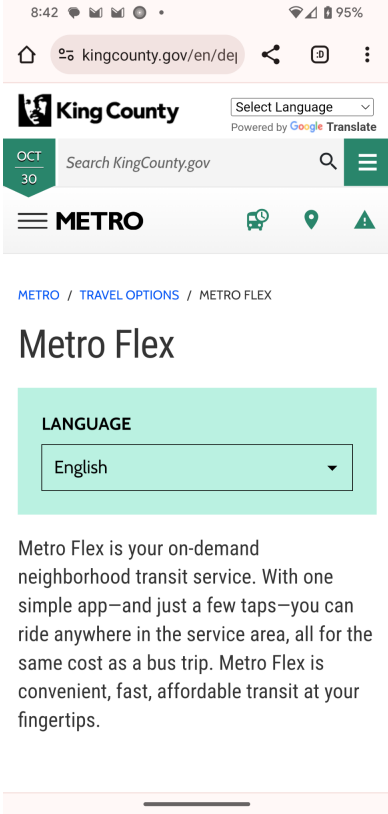
When Island Transit's ITOD 2C "on demand" service is compared to the on-demand transit service from three other Washington state public-transit operators, ITOD 2C fails to convey any of the four key features of best-practices, on-demand public-transit: Point-to-point, immediate service accessible through a full featured app with the option of designating a "home" stop.

Island Transit "on demand" is on-demand transit in name only. Island Transit management has accepted public funding for ITOD 2C then failed to adequately plan, implement and manage the system. As Mister Troy, the manager at the Camano Island facility for Island Transit said to a passenger: "I can not do anything about your concerns. This is the system we have been given. It has a brain and we just have to do what it tells us." As a model of modern, on-demand transit, ITOD 2C is a fraud.

## 5.2 Fraud - On-Demand Transit in Washington State Compared To Island Transit “on demand”

 <p>5:34 LTE 76%</p> <p><b>Island Transit GO!</b></p> <p>EXPANDED SERVICES effective OCTOBER 1</p> <p>Island Transit GO! Fare Free On Demand Service Now servicing ZONES 2C (Camano Island), 3, 4, 58, NASWI (Whidbey Island)</p> <p>Videos Below - How to take On De </p> <p>Island Transit's on demand service is transportation when and where you need it. Island Transit Go! provides a flexible and convenient alternative to fixed route services designed to improve connections to transit hubs and popular destinations such as shopping centers and grocery stores. The app-based technology matches multiple riders headed in a similar direction into a single vehicle, allowing for quick and efficient shared trips. Trips must start and end within the designated service area. After booking a ride, the app will display the pick-up location where the vehicle will meet you. This is a bus stop -to- bus stop service so that you will be picked up and dropped off close as possible to your destination. Since this is a shared ride service, you may board with others in the vehicle or stop to pick up others.</p>	 <p>5:07 LTE 81%</p> <p>mail.c-tran.com/about</p> <p>MENU</p> <p>Select Language</p> <p>Transit app Get Notified</p> <p>«C-TRAN: OUR COMMUNITY, OUR PROMISE»</p> <p>Search ...</p> <p><b>Introducing The Current: C-TRAN's new on-demand service</b></p> <p><b>Vancouver, WA:</b> Starting January 10, 2022, C-TRAN will launch The Current, a new on-demand rideshare platform that provides door-to-door service for just the cost of a bus ride. Passengers can schedule a ride online or through the new mobile app, then track their driver's arrival, just like other rideshare services. Rides can also be scheduled over the phone by calling C-TRAN Customer Service at 360-695-0123.</p>	 <p>5:43 LTE 74%</p> <p>piercetransit.org/rustc</p> <p>Find a rewarding career, check out the many opportunities that await you <a href="#">HERE!</a></p> <p>PierceTransit MENU</p> <p><b>RUSTON RUNNER</b>  Point to Point</p> <p>How is Pierce Transit Runner operated?</p> <p>The Ruston Runner is provided in partnership with MedStar, a Washington-based company that specializes in accessible, user-friendly transportation. The vans used for Pierce Transit's Ruston Runner can accommodate wheelchairs and bicycles, so the service is easy for anyone to use. These vehicles will pick you up and drop you off anywhere a car can go. Riders may be grouped into a single vehicle if rides are going to a similar location, helping to reduce wait times. Parking lots and pull-outs along Ruston Way make great meeting places and give you quick access to local restaurants and shops. Designated pick-up and drop-off areas at Tacoma Dome Station and Commerce Street Station make transferring to</p>
<p><b>Island Transit ITOG 2C</b></p>	<p><b>Clackamas County Transit</b></p>	<p><b>Pierce Transit</b></p>
<p>Designated, widely spaced rural stop to designated widely spaced rural stop service.</p> <p>Two hour advance booking.</p> <p>App unusable without prior knowledge and access to printed list of stops.</p> <p>No user instructions, contact information or route information contained in the app.</p> <p>No self-service sign-up for the app.</p> <p>Replaced long standing, reliable, scheduled service which connected to other routes. No other options for</p>	<p>Door to door service.</p> <p>Immediate ride if available.</p> <p>Full featured on-demand app.</p> <p>Self-service signup using a textable phone number.</p> <p>Ability to designate a “home” stop.</p> <p>An additional service designed to work with existing transit options.</p>	<p>“Anywhere a car can go.”</p> <p>Immediate ride if available.</p> <p>Full featured on-demand app.</p> <p>Self-service signup using a textable phone number.</p> <p>Ability to designate a “home” stop.</p> <p>An additional service designed to work with existing transit options.</p>



<p>South End residents.</p>		
 <p>8:42 95% kingcounty.gov/en/dej King County Select Language Powered by Google Translate OCT 30 Search KingCounty.gov METRO METRO / TRAVEL OPTIONS / METRO FLEX Metro Flex LANGUAGE English Metro Flex is your on-demand neighborhood transit service. With one simple app—and just a few taps—you can ride anywhere in the service area, all for the same cost as a bus trip. Metro Flex is convenient, fast, affordable transit at your fingertips.</p>		
<p><b>King County Metro Transit</b></p>		
<p>“Anywhere in the service area.”</p> <p>Immediate ride if available.</p> <p>Full featured on-demand app.</p> <p>Self-service signup with a textable phone number.</p> <p>Ability to designate a “home” stop.</p> <p>An additional service designed to work with existing transit options.</p>		

### 5.3 Fraud - “Island Transit Go” app

Island Transit management has represented to their funders and riders that they supply a smart phone app and a Web app which enables “on demand” riders to “book” a ride from their smart phone or Web browser.

The software that Island Transit has provided is not a usable app by any standard.

In order to be considered a functioning app the Island Transit Go app would have to have a minimum of four essential features.

1. A selectable list of pickup points.
2. A selectable list of dropoff points.
3. A selectable list of available drop off or pickup times.
4. A place to tap to accept and book the trip.

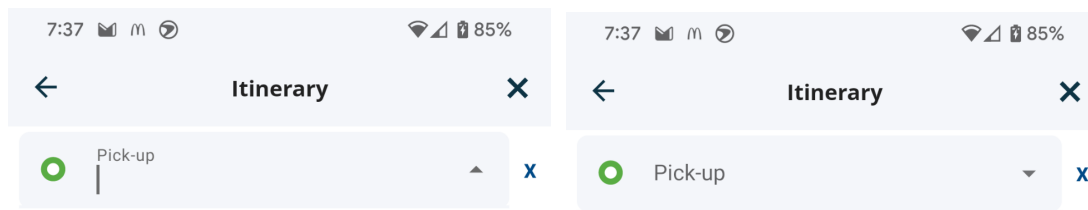
To book a trip the user, without prior knowledge of the route, should be able to open the app on their device and:

1. Pick their pickup point from a dropdown list of the 41 available stops.
2. Pick their dropoff point from a dropdown list of the 41 available stops.
3. Select a time from currently available trip times on the time selector.
4. Tap or click the “Book Trip” button.

By contrast, in its present form, using the Island Transit Web app requires the following:

1. A phone call to Island Transit to request a logon. You must supply an email address, name and phone number to Island Transit to use the app.
2. Receipt of an email from a company called Ecolane that contains logon information. The email does not mention any association with Island Transit but asks you to click a link to “set your personal password”. If a reasonable user stumbled across the email in their “spam” folder, it would be entirely reasonable for the user to regard it as malicious and delete it. They are not likely to click on any links in an email from an unidentified source.
3. Open the app and consider what to do with a “Pick Up” selector that displays no choices.
4. After calling Island Transit and asking about the empty Pickup selector, Island Transit will share the secret code “ITOD 2C” that must be entered in the selector box using the keyboard then the exact spelling of the stop they want to be picked up at.
5. The user must download a .PDF of the ITOD 2C stops or get a copy from the scheduled buses in order to know the exact letter-for-letter spelling for their stop. Though the stops are numbered in the guide, the stop numbers are not usable for the booking form.
6. Repeat step 6 for the drop off location.
7. Tap the time selector.
8. Call Island Transit and ask the hours of operation for ITOD 2C.
9. Pick the time and date being careful to pick a time within the operating hours.
10. Ignore all the confusing Paratransit related questions regarding mobility etc.
11. Tap or click the Book trip button.
12. If the time is refused due to “Trip Availability”, guess at a time a few minutes before or after the desired time. Repeat until you find an available time.

The booking screen for the island Transit Go “app”. Users must know the secret code “ITOD 2C and the exact spelling of the designated stop. They must key in this information letter-by-letter on a cell-phone on-screen keypad. Though the designated stops are numbered, using the stop number is not a valid entry. Compare this to the booking screen shown on page 24 and used by true on-demand transit in other areas.



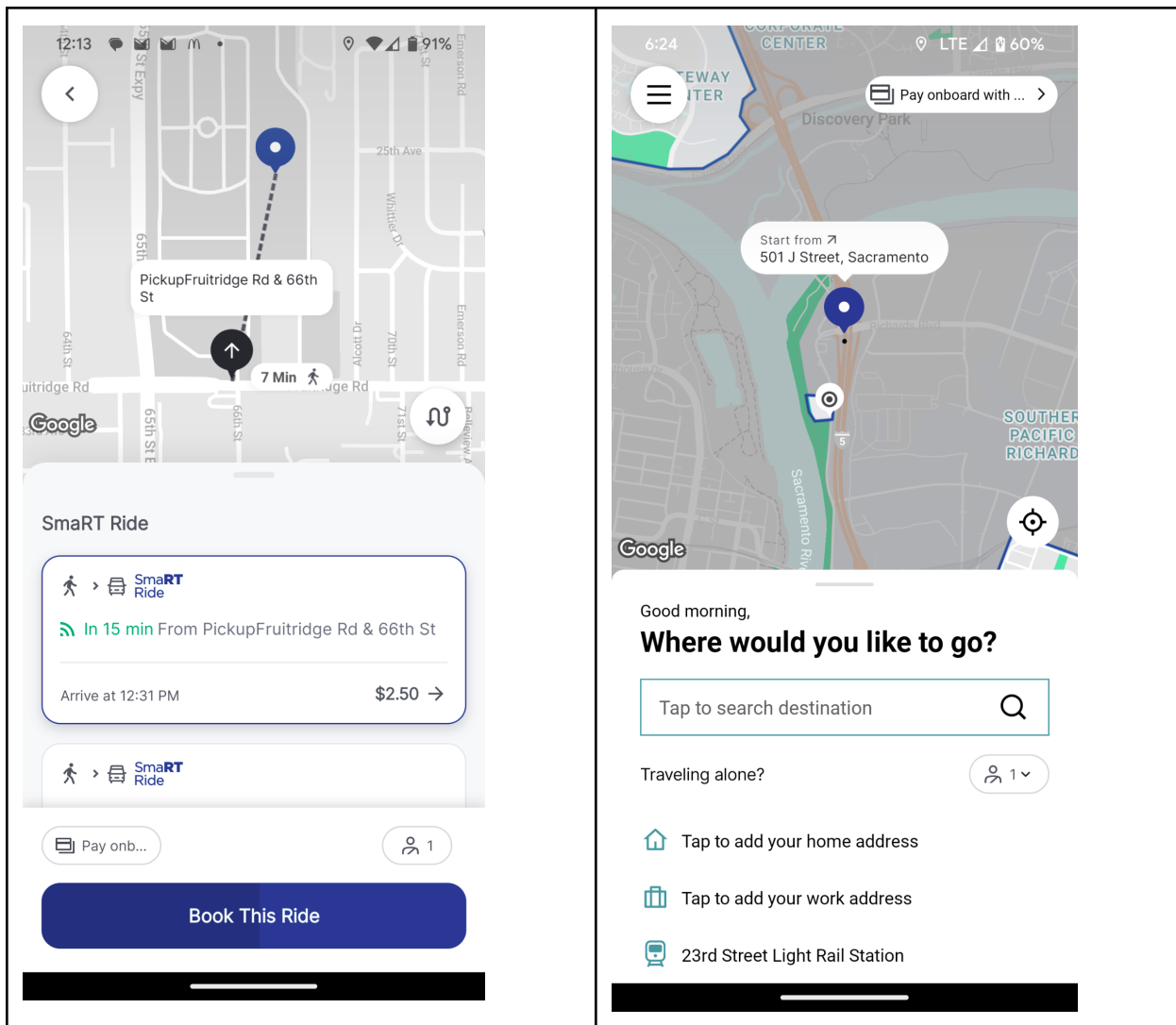
Upon opening a fixed-point, point-to-point transportation app, it would be reasonable for a user to expect to see a list of the available pickup and dropoff points presented as dropdown selectors. Not so with the Island Transit “Go App” A user must have prior knowledge of the secret “ITOD 2C” code and access to a separate written list of the 41 available stops. They must be capable of keying in the secret code followed by the exact spelling of the stop both for Pickup and Dropoff. They must know the hours of operation in order to select an acceptable time and if refused that time based on “run availability” they must guess at alternate times until they find one that works.

Testimony from sources having direct conversations with the operations manager Shawn Harris at Island regarding the app have quoted Mister Harris as stating “It is good enough.” The same

source has reported that the project manager known as Brian answered the question about unpopulated selectors with the statement: “Ecolane can not do that. It is not changing.”

By representing during the ITOD 2C approval and public funding process that they will supply an app with which riders can book their own trips in the ITOD 2C area, Island Transit management has misled and deceived its riders and funders. It has committed an act of fraud.

Sacramento, California has implemented a version of On-Demand transit which they call SmaRT. A ITOD 2C rider reports they were able to download the SmaRT app, signup with a single text message and book a trip (then cancel it) in less than 3.5 minutes. Note that the SmaRT on-demand app allows the user to register both a “Home” and “Work” personal stop.



**SACRAMENTO REGIONAL TRANSIT** 50 1973-2023

Select Language ▼

SCHEDULES & SERVICE ▼ RIDER INFO ▼ ABOUT SACT ▼

SmaRT Ride is similar to other ride-share services where customers can use a smartphone app to request a ride that will pick up and drop off passengers within the service boundaries.

**SmaRT Ride Service Areas**

Citrus Heights-Antelope-Orangevale offers [curb-to-curb service](#) where passengers are picked up and dropped off at the address they indicated when scheduling.

All other service areas offer [corner-to-corner service](#) where passengers are picked up and dropped off at the nearest corner or 'virtual bus stop,' which is usually within a block or two of their pickup or drop-off location. The Downtown Core (north of S Street, west of 20th Street in downtown Sacramento) will be a limited stop zone, where Smart Ride will pick up and drop off at specific destinations as noted on the map.

**Curb-to-curb service areas:**

- Citrus Heights-Antelope-Orangevale
  - Informational Flyer

## 6. Misuse of Public Funds

In the context of this document, misuse of public funds relates to the procurement of expensive technology assets by Island Transit and Island Transit Management's subsequent failure to maximize the value of those assets for the public good through proper implementation, management and vendor accountability.

Examples of these acts is spending money for passenger facing "reader boards" that routinely provide the wrong time and stop name - by several hours and several miles and driver-facing "tablets" equipped with software that does not allow dispatch to know the exact location of every bus at every moment, even though the system was purchased with the understanding that it would do so.

Like the child who, upon finding the new toy he asked for was not as exciting as depicted on television, leaves the toy out in the driveway at night in the rain, so it is with Island Transit management and technology. They leave their buses out operating in the rain and the dark without the promised and paid for safety and efficiency benefits of the technology they have procured.

### 6.1 Misuse of Public Funds - Technology assets

Island Transit has purchased at great expense essential information system components for their operation including but not limited to Route Match and Ecolane software, two-way radios, mobile tablet computers and associated connectivity services and devices. It has incorporated the devices and services into its system in an incompetent manner. Island Transit has not held their technology vendors, service providers, contractors or employees accountable for delivering the full benefit of the resources for which they paid with taxpayer dollars. Island Transit has accepted without challenge weak excuses from the vendors for operational shortcomings. It has not vigorously pursued workarounds, resolutions, refunds or replacements but has instead left it for drivers and dispatchers to deal with a hodge-podge mess the best they can. It is estimated that 45% of the radio traffic between drivers and dispatchers has to do with in-route failures of

Route Match. The expenditure of public funds demands that those making the disbursements insure the public receives full values.

The “technology” to share a two-radio channel between operational groups without listening to each other's traffic has existed for more than 50 years. Even so Camano Island riders listen to a seemingly constant chatter and static originating from the Whidbey Island routes, traffic that has no significance or value to the Camano Island routes. The static and chatter often makes it difficult for drivers to understand rider stop requests or inquiries. There are drivers with a low tolerance and turn their radios down but then miss calls that are intended from them and are disciplined. Other drivers take their handset out of its cradle to manually squelch the two-way radio audio while they handle a rider's question or comment.

If Island Transit management was forced to listen to constant radio traffic and static that had nothing to do with them, I believe they would pick up their phone, call the two-way radio vendor and have the standard channel-sharing feature implemented immediately. Or even better they would fix the deficiencies and flaws in their technology systems which precipitates an estimated 50% of the driver-to-dispatcher radio traffic.

## **7. \*\*Fixing ITOD 2C\*\***

Criticism made without a plan for success is just noise. The following is a carefully thought out approach to fixing ITOD 2C by converting it to a hybrid demand-scheduled service.

7.1 Procure or develop in-house, true on-demand management software, matched and tuned to ITOD 2C requirements.

7.2 Procure or develop in-house, a customer facing app which meets the following requirements:

7.2.1 All designated On Demand stops appear on the Pick Up and Drop Off selectors. The drop off or pickup point for a given booking is selected with a single tap or click.

7.2.2 Only available Leave By and Arrive By times, in ten minute increments, shown on time selector. Times and dates in the past and during non-service hours do not appear. Time and date selected with two clicks.

7.2.3 Self-serve app sign up with user verification by text or email.

7.2.4 Option to register a personal flag stop if the designated-stop is more than 50 yards distance.

7.3 Make ITOD 2C a single bus based at Terry's Corner with service only within Zone 2.

7.3.1 ITOD 2C departures are tightly coupled to the arrival of the scheduled buses, ie :40 after.

7.3.2 ITOD 2C only rolls when:

7.3.2.1 There are East riders, heading down-island, present at Terry's Corner at :40 after.

7.3.2.2 There are riders at a Zone 2 route point, heading either direction, booked by :39 after.

7.3.3 If there are no down-island bound ITOD 2C riders at Terry's Corner or ITOD 2C bookings for that hour, ITOD 2C does not roll.

7.3.4 On any given departure, ITOD 2C rolls only within Zone 2 and only as far within Zone 2 as the furthest Zone 2 rider-drop or Zone 2 booking.

7.3.5 Paratransit jobs originating in Zone 2 are operated as paratransit was before On Demand Service was implemented.

7.3.6 Paratransit passengers within Zone 2, if present or booked per above, can be picked, dropped or transferred within Zone 2 by ITOD 2C, just as with scheduled service.

## 8. **\*\*Summation\*\***

Island Transit Route 2C which served the South End of Camano Island with hourly bus service for twenty years was replaced with Route ITOD 2C on 01 October 2023. Without the benefit of public comment or rider input, Island Transit implemented ITOD 2C as being a model of “The way things are going.” and “The way it is going to be.”

ITOD 2C was haphazardly implemented and has been a failure by every metric. Labeled “on demand” by Island Transit management ITOD 2C fails a feature-by-feature comparison test with true on-demand transit in three other Washington counties.

Ridership has plummeted from the rider counts of Route 2C. Trip times for riders have increased and driver morale has suffered. As one driver stated “I can not give my riders the service that I used to and it breaks my heart.”

Riders who for twenty years caught their bus from a flag stop at the end of their driveway or street must now travel a rural road, in some cases more than a mile, without sidewalks or street lights to get to and from their new designated stop. And for no reason as Island Transit's Ecolane route management software accommodates “home” stops by default.

Despite efforts to engage Island Transit management and supervisors in constructive conversations about the obvious flaws in ITOD 2C and reasonable fixes, Island Transit management has closed ranks, standing shoulder-to-shoulder in a this-is-what-we-are-doing, take-it-or-leave-it formation. Having exhausted all avenues of dialogue with Island Transit management it has regrettably become necessary to take a stronger approach in order to preserve transportation equity for South End riders.

Document Revisions  
v 0.9.9 03 NOV 2023  
v 1.0.0 06 NOV 2023