



CITY OF SANDY TRANSIT

TITLE VI PROGRAM

July 2021



Table of Contents

| | |
|--|----|
| Title VI Program..... | 3 |
| Notice to the Public of the Rights Under Title VI..... | 5 |
| Notice to the Public of the Rights Under Title VI in Spanish..... | 6 |
| Title VI Complaint Procedure..... | 7 |
| Title VI Complaint Form..... | 8 |
| Title VI Investigations, Lawsuits and Complaints Log..... | 10 |
| Public Participation Plan..... | 11 |
| Language Assistance Program for the Limited English Proficient | 12 |
| Four Factor Analysis..... | 13 |
| Implementation..... | 16 |
| Minority Representation Table..... | 19 |
| Fixed/Commuter Route Service Standards Policy..... | 19 |
| Demand-Response Service Standards Policy..... | 20 |
| Transit Amenity Policy..... | 21 |



Title VI Program Effective July 2021

Ref: FTA Circular 4702.1B Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients

Purpose: The purpose of this policy is to establish guidelines to effectively monitor and ensure that City of Sandy Transit is in compliance with all FTA Title VI requirements and regulations in order to carry out the provisions of the Department of Transportation's (DOT) Title VI Regulations at 49 CFR Part 21.

Policy: The City of Sandy Transit ensures that its programs, policies, and activities comply with the Department of Transportation's (DOT) Title VI regulations. Sandy Transit is committed to creating and maintaining public transit service that is free of all forms of discrimination. The agency will take whatever preventive, corrective and disciplinary action necessary for behavior that violates this policy or the rights and privileges it is designed to protect.

Required to provide an annual Title VI certification and assurance. To ensure accordance with 49 CFR Section 21.7, every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI of the Civil Rights Act of 1964. This requirement shall be fulfilled when the applicant submits its annual certifications and assurances to FTA. The text of FTA's annual certifications and assurances is available on FTA's Web site. The City of Sandy complies with this instruction annually in order to receive FTA funding.

Required to notify beneficiaries of protection under Title VI. In order to comply with 49 CFR Section 21.9(d), recipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients that provide transit service shall disseminate this information to the public through measures that can include but shall not be limited to a posting on the agency's web site. City of Sandy has information on their web site, included on transit bus schedules and signage posted on all buses.

Required To Develop Title VI Complaint Procedures. In order to comply with 49 CFR Section 21.9(b), recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request. Sandy Transit provides for their dispatchers and/or supervisor to take complaints as well as comment cards available on



buses. All complaints are forwarded to the Title VI Complaint Coordinator (Transit Program Administrator) who categorizes, tracks them and develops responses.

Required to record Title VI investigations, complaints and lawsuits. In order to comply with 49 CFR Section 21.9(b), recipients shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming the recipient that allege discrimination on the basis of race, color, or national origin. This list shall include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint. The Sandy Transit Title VI Complaint Coordinator (Transit Program Administrator) maintains these files. Sandy Transit has had no Title VI investigations, complaints or lawsuits.

Required to provide meaningful access to Limited English Proficient (LEP) persons. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient. The City of Sandy has developed a LEP plan and identified Spanish as the most commonly spoken foreign language of Sandy area riders. Other language groups have been an incidental portion Sandy Transit's of ridership which is reflective of the general population. Therefore, transit bus schedules and brochures are published in English and Spanish. Schedules, park and ride information and the nondiscrimination policy are available in English and Spanish on the website. Transit operators and dispatchers have access to Spanish language translations of commonly used phrases. Sandy Transit is involved with public outreach activities to ensure our LEP customers have access to services as well as information they may need in Spanish. In 2017, Sandy Transit activated a telephone translation service that provides interpreters of 222 languages.

Required to provide additional information upon request. At the discretion of the FTA, information other than that required by the referenced circular may be requested, in writing, from a recipient in order to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI requirements. The City of Sandy Title VI Complaint Coordinator (Transit Program Administrator) is available to provide additional information as needed and to respond to any inquiry.

Required to prepare and submit a Title VI Program. FTA requires recipients to report certain general information to determine their compliance with Title VI. The collection and reporting of this program constitute the recipients' Title VI Program. To ensure compliance with 49 CFR Section 21.9(b), FTA requires that all recipients document their compliance with this chapter by submitting a Title VI Program to FTA's regional civil rights officer once every three years.

Discrimination

Any act or omission of an act which would prevent the use of or exclude a person from access to public transportation based on (but not limited to) race, color, natural origin, gender, disability, or religion.

NON-DISCRIMINATION POLICY STATEMENT

City of Sandy Transit, under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person in the City of Sandy, on the grounds of race, color, national origin, gender, disability, religion, sexual orientation, or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity it administers.

For information or guidance on how to file a complaint based on the grounds of race, color, national origin, gender, disability, religion, sexual orientation, or age, please visit the following web page:

http://www.oregon.gov/ODOT/CS/CIVILRIGHTS/Pages/tvi_disc_comp.aspx

If information is needed in another language please call: 503-489-0921
Si se necesita informacion in otro idioma de contacto, 503-489-0921

To be posted:

City of Sandy Website
At the reception desk of the Sandy Operations Center
Operations Center breakroom
Inside vehicles
In bus schedules

LA NO DISCRIMINACION POLITICA DE EST ADO

Ciudad de Sandy Transporte, en el Titulo VI del Acta de Derechos Civiles de 1964 y los estatutos relacionados, asegura que ninguna persona en el Ciudad de Sandy podrim, por motivos de raza, color, origen nacional, genero, discapacidad, religion, la orientacion sexual, o edad, se excluidos de la participacion en, negarsele los beneficios de, o ser de otra manera sujeto a discriminacion bajo cualquier programa o actividad que administra.

Para obtener informacion sobre como presenlar una denuncia basada en motivos de raza, color, origen nacional, genero, discapacidad, religion, la orientacion sexual, o edad, por favor visite la siguiente pagina:

http://www.oregon.gov/ODOT/CS/CIVILRIGHTS/Pages/tvi_disc_comp.aspx

Si se necesita informacion in otro idioma de contacto, 503-489-0921

To be posted:

City of Sandy Website
At the reception desk of the Sandy Operations Center
Operations Center breakroom
Inside vehicles
In bus schedules



City of Sandy Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, national origin, gender, disability, religion, sexual orientation, or age by the City of Sandy Transit Authority (hereinafter referred to as “the Authority”) may file a Title VI complaint using any of the six methods listed below. The City of Sandy Transit Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Methods of filing a complaint:

- 1) Submit a customer comment card with contact information
- 2) Phone the transit office at 503-489-0921 or 503-668-3466
- 3) E-mail the transit office at mrustam@ci.sandy.or.us
- 4) Submit an online civic service complaint form at <http://www.cityofsandy.com>
- 5) In person at the transit office located at 16610 Champion Way Sandy, OR 97055
- 6) Mail written complaint to 16610 Champion Way Sandy, OR 97055

The supervisor or program administrator will investigate the complaint and make a determination. Formal investigation of the complaint will be confidential and will include, but is not limited to, details of the specific incident, frequency and dates of occurrences and names of any witnesses. Customer will be notified of resolution.

If the complainant is not satisfied with the resolution, an appeal process is available. An appeal request for review of a determination of unlawful denial of access or accommodation to public transportation must be filed, in writing, within 60 calendar days of the incident. The written appeal must include the customer’s name, address, and telephone contact number. A statement of reason(s) why the applicant believes the denial of accommodation request or access to public transportation was inappropriate is recommended.

The Transit Director will set a mutually agreed-upon time and place for the review process with the applicant and/or representatives within 30 days of request. The applicant can waive personal appearance in preference of a phone review followed by written determination. The applicant may submit documents or other information to be included with the record and considered in the review process. A record of the review will be kept, as determined by the Transit Director. Anyone needing special accommodations may contact the Transit Director at 503-489-0925 for assistance.

The right of the appellant to a prompt and equitable resolution of the complaint must not be impaired by the appellant’s pursuit of other remedies, such as filing of a complaint with the Department of Justice or other appropriate federal agency or the filing of a suit in state or federal court. Use of this procedure is not a prerequisite to the pursuit of other remedies.



City of Sandy Title VI Complaint Form

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

Title 42 U.S.C. Section 2000d

Please provide the following information necessary in order to process your complaint. A formal complaint must be filed within 180 days of the occurrence of the alleged discriminatory act. Assistance is available upon request. Please contact Sandy Transit at (503) 489-0925.

Complete this form and return to:

**Sandy Transit
16610 Champion Way
Sandy, OR 97055**

Complainants Name: _____

Address: _____ City: _____

State: _____ Zip Code: _____ Telephone Home: _____

Telephone Cell: _____ Telephone Work: _____

Person (s) Discriminated Against (if other than complainant):

Name: _____

Address: _____ City: _____

State: _____ Zip Code: _____ Telephone Home: _____

Telephone Cell: _____ Telephone Work: _____

On which of the following is the discrimination based?

Race/Color National Origin Gender Disability

Low Income Limited English Proficiency Religion Sexual Orientation Age

Date of Alleged Discrimination: _____ Location: _____

Agency or person who was responsible for alleged discrimination: _____



Describe the alleged discrimination. Explain what happened and whom you believe was responsible (for additional space, attach additional sheets of paper to this form).

How can this complaint be resolved? How can the problem be corrected?

Please sign and date. The complaint will not be accepted if it has not been signed. You may attach any written materials or other supporting information that you think is relevant to your complaint.

Signature

Date



**Title VI Investigations, Lawsuits and Complaints
2021-2023**

| 2021-2023 | Date (MM/DD/YY) | Summary (include basis of complaint: race, color, or national origin) | Status | Action(s) Taken |
|-----------------------|----------------------------|--|---------------|----------------------------|
| Investigations | | | | |
| | | | | |
| | | | | |
| | | | | |
| Lawsuits | | | | |
| | | | | |
| | | | | |
| | | | | |
| Complaints | | | | |
| | | | | |
| | | | | |
| | | | | |

*To be reported to ODOT every 3 years



Public Participation Plan:

Our agency develops policies that are inclusive of diverse populations. On-going analysis is performed to identify populations who live in geographic proximity. The Hispanic/Latino population is the only minority with a significant (10.2% total population, with 81.1% speaking English “very well” and 18.9% speaking English “less than very well”, according to 2019 American Community Survey) of the local population.

(2019: ACS 5- Year Estimates Subject Table)

All service design and development involves public process with special efforts made to include these populations and ensure equal access. The Sandy Transit Advisory Board consists of individuals with disabilities, senior citizens and business owners. Notifications are provided to local papers, community centers, library, shopping centers, on buses and at bus stops/shelters. Sandy Transit offers transit training and conducts annual surveys. Additionally, the City Council meets bi-monthly and all meetings are open to the public.

The website has been updated to include more information in Spanish. All staff have the "Basic Spanish for Transit Employees" reference booklet. Translation services were added to the Transit Department account as of 2017 for LEP telephone conversations.



Language Assistance Program for Limited English Proficient Population

Sandy Transit's Limited English Proficiency Policy:

Sandy Transit is committed to providing quality services to all citizens, including those with limited English proficiency.

Background and Analysis:

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be considered limited English proficient, or "LEP."

These individuals may be entitled language assistance with respect to a particular type or service, benefit, or encounter.

According to the U.S. Department of Transportation's (USDOT) Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, "Title VI and its implementing regulations require that recipients take responsible steps to ensure meaningful access by LEP persons. Recipients should use the guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP."

Federal financial assistance includes grants, cooperative agreements, training, use of equipment, donations of surplus property, and other assistance. Recipients of USDOT assistance that are subject to LEP requirement include:

- State departments of transportation;
- Metropolitan planning organizations (MPOs);
- Regional transportation agencies;
- Regional, state, and local transit operators;
- State and local agencies with emergency transportation responsibilities (e.g.,
- Transportation of supplies for natural disasters, planning for evacuations, quarantines and other similar actions).

Sandy Transit acts as the local transit operator for the City of Sandy. LEP requirements extend to all local transit programs or activities, even if some activities are not funded by federal assistance. Subrecipients are also covered in cases when federal funds are passed through from a recipient to a subrecipient.

The USDOT recommends four factors that should be analyzed by federally assisted agencies and programs to determine the level and extent of language-assistance measures required to sufficiently ensure meaningful access to programs, activities, and services within the City of Sandy's area of responsibility. After conducting the four-factor analysis, Sandy Transit is in a better position to implement a cost-effective mix of proactive language-assistance measures, target resources appropriately, and to respond to requests for LEP assistance from constituents.

The four factors to be considered are:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency the LEP individuals come into contact with programs, activities and services.
3. The importance of programs, activities and services, to LEP persons
4. Resources available to the recipient and costs

What specific steps should be taken will depend on the information gathered from Census and other data and from analysis of agency resources and the costs of providing language assistance.

MEETING THE REQUIREMENTS

Safe Harbor Stipulation:

Federal law provides a “safe harbor” stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A safe harbor means that as long as a recipient has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

However, failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides for recipients a guide for greater certainty of compliance in accordance with the four factor analysis. Evidence of compliance with the recipient’s written translation obligations under “safe harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less of eligible persons served or likely to be affected. Translation can also be provided orally.

The safe harbor provision applies only to the translation of written documents. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters, where oral language services are needed and reasonable to provide.

Providing Notice to LEP Persons:

USDOT guidance indicates that once an agency has decided, based on the four factors, to provide language services, it is important that the recipient notify LEP persons of services available free of charge in a language the LEP persons would understand. Example methods for notification include:

1. Signage that indicates when free language assistance is available with advance notice;



2. Stating in outreach documents that language services are available;
3. Working with community-based organizations and other stakeholders to inform LEP individuals of Sandy Transit services and the availability of language assistance;
4. Using automated telephone voice mail or menu to provide information about available language-assistance services;
5. Including notices in local newspapers in languages other than English;
6. Providing presentations and/or notices at schools and community-based organizations about available language services.

LEP

Four Factor Analysis

Factor 1: The Number and Proportions of LEP Persons in the Eligible Service Area.

**Table 1—Language Spoken at Home by the Ability to Speak English: Population 5 Years and Over
(2019: ACS 5- Year Estimates Subject Table)**

| City of Sandy | | | | | | | | | | | | |
|----------------------|-----------------------------------|-----|--------------------|-------|---------------|-----|------------------------------|-----|---------------------------------------|-----|----------------------|---|
| Pop (5 yrs and over) | Speak English Less Than Very Well | | Speak English Only | | Speak Spanish | | Speak Indo-European Language | | Speak Asia or Pacific Island Language | | Speak Other Language | |
| | # | % | # | % | # | % | # | % | # | % | # | % |
| | 10,179 | 235 | 2.3% | 9,030 | 88.7% | 604 | 5.9% | 284 | 2.8% | 261 | 2.6% | 0 |

Table 2—LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Universe: Population 5 years and over ⓘ

(2019: ACS 5-Year Estimates Subject Tables)

| Pop | Speak English Less Than Very Well | | Speak English Only | | Speak Spanish | | Speak Spanish and Speak English Less Than Very Well | |
|--------|-----------------------------------|------|--------------------|-------|---------------|------|---|-------|
| | # | % | # | % | # | % | # | % |
| 10,179 | 235 | 2.3% | 9,030 | 88.7% | 604 | 5.9% | 114 | 18.9% |

According to the 2019 American Community Survey 5.9% of the population speak Spanish, the most common language after English. Of those who speak Spanish, 18.9% (114 people) self-report that they speak English less than very well.

Conclusion: Spanish is the most frequently spoken foreign language spoken by LEP individuals in the Sandy Transit area and should be the focus of any translation or language assistance activities.

Factor 2: The Frequency in which LEP Individuals Encounter City of Sandy Transit Programs.

The analysis identified Spanish as the most prevalent language spoken by LEP individuals in the Sandy Transit service area. The analysis further reveals that LEP individuals comprise 6% or less of the region’s population. To date, no requests for language-assistance services have been made by LEP individuals, although during a City of Sandy survey, 13.2% of the ridership reported identifying as Hispanic and 1 person took the Spanish version of the survey.

Factor 3: The Importance of the Service Provided by Sandy Transit

Public transportation is vital to many people’s lives. According to the Department of Transportation’s *Policy Guidance Concerning Recipient’s Responsibilities to Limited English Proficient (LEP) Persons*, “Providing public transportation access to LEP persons is crucial. An LEP person’s inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment.”

The City of Sandy survey revealed that the percentage of Hispanic/Latino ridership (13.6%) was greater than that of the general population at the time (10.2%). Therefore, this population does utilize public transportation and may need language assistance.

Factor 4: The Resources Available and Overall Sandy Transit Costs

Sandy Transit has traditionally budgeted between \$5,000 annually for printing product documents, schedules and other public participation material. The bus schedule and route map is currently in both English and Spanish. Information is also currently available in Spanish and English on the City of Sandy web page and inside Sandy buses.



The City of Sandy implemented a multi-lingual telephone translation service available for callers who do not speak English as their primary language. The annual operating budget for Sandy Transit service is \$1.5 million.

IMPLEMENTATION

Due to the importance of the service provided, as indicated in factor 3, Sandy Transit will implement the following Limited English Proficiency (LEP) Plan. This plan will provide limited language assistance services to the LEP population in the Sandy Transit region.

All language assistance activities detailed below will be coordinated by the City of Sandy Transit Department's Transit Director.

Identifying LEP Individuals Who Need Language Assistance:

Key staff at Sandy Transit offices will use language identification cards when first encountering a LEP individual. These cards, developed by the U.S. Census Bureau, have the phrase "Mark this box if you read or speak [name of language]" translated into 38 different languages. It was developed by the Census Bureau and is used by government and non-government agencies to identify the primary language of LEP individuals during face-to-face contacts. The Census Bureau's Language Identification Flashcard can be downloaded for free at www.usdoj.gov/crt/cor/Pubs/ISpeakCards2004.pdf.

The Language Identification flashcards will be made available at public meetings and the front desk of the City of Sandy Operations Center. Once a language is identified, the LEP coordinator or relevant point of contact will be notified to assess feasible translation or oral interpretation assistance.

Basic Spanish for Transit Employees will be available on-board buses and available to all dispatch and operations staff.

The Language Line Solutions, a telephone translation service, provides another useful tool for telephone conversations with LEP populations.

Language Assistance Measures:

Language assistance will be provided for LEP individuals through the translation of some key materials, as well as through oral interpretation when necessary and possible.

Translation of Written Materials:

Translation of all Sandy Transit plans and materials is not possible due to cost restrictions, and the current population levels do not warrant such translations. However, Sandy Transit will provide the following translated materials:

- Current Sandy Transit outreach materials should be translated on a case-by-case basis. Sandy Transit will also consider requests to provide key outreach materials in Spanish as new materials are developed. Documents that will be or are in Spanish are:

- Title VI Notice
- On-board signage
- Published transit schedule and route map

- Sandy Transit website – the City of Sandy is currently assessing cost and infrastructure requirements to efficiently modify the City of Sandy Transit Department’s website to provide as much information as possible in Spanish as well as English.

Oral Language Services:

Sandy Transit will provide some oral interpretation services to Spanish-speaking LEP individuals. In order to provide these services, the LEP coordinator will:

- Maintain a list of outside sources that can provide oral translation services (including both paid and unpaid services). Outline the cost of these services. Identify budget and personnel limitations.

Providing Notice of Available Language Service to LEP Persons:

Sandy Transit has established the following methods to inform Spanish-speaking LEP individuals, supporting organizations, as well as the general public, of available no-fee LEP services.

- Posting information – Sandy Transit will post information at the front-desk reception area to notify LEP individuals of any available services to translate Sandy oral or written program material, and how to obtain these services.

- Outreach documents – Key outreach documents will include a notice that some language assistance services are available. This notice will be listed in Spanish and English.

- Community organizations – Sandy Transit will notify area community-based organizations and other stakeholders of available language-assistance services.

- Community presentations – participate in presentations, trainings and/or notices in Spanish at schools, low-income housing and religious organizations.

Current budget and staff limitations preclude Sandy Transit from implementing all available notification techniques. However, in the future, Sandy Transit may consider additional notification methods, such as:



- Automated telephone voice mail attendant or menu system – provides information about available language-assistance services and how LEP individuals can obtain access.
- Website translation services.

Monitoring and Updating the LEP Plan:

Sandy Transit will monitor changing population levels and the language needs of LEP individuals in the region. An annual review of this LEP plan will coincide with the annual evaluation of the public participation activity and the Title VI program. Evaluation results and recommended changes will be shared with Sandy Transit’s Transit Advisory

Board (TAB). The LEP Coordinator will also keep a record of any LEP services provided and will make this information available during the annual review process.

In connection with updates to Sandy Transit’s Title VI Program and Public Participation Plan, Sandy Transit may use some of the following tools to conduct further assessment:

1. Conduct surveys or focus groups.
2. Develop an evaluation process to assess LEP service provision.
3. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities.

Sandy Transit will determine the appropriate mix of written and oral language communications for LEP individuals — to include but not limited to — translations, on paper, over the Internet, interpreter assistance, or by working with local organizations that serve LEP persons in the City of Sandy and surrounding areas.

Contact:

Sandy Transit will respond to reasonable requests for LEP consideration in its programs and activities.

In order to request assistance or to discuss LEP issues, please contact:

Andi Howell
Transit Director
City of Sandy, Transit Department
16610 Champion Way
Sandy, OR 97055
Phone: (503) 489-0921
Fax: (503) 826-0618

To file a complaint regarding LEP activities, please fill out the Title VI complaint form available at <http://www.cityofsandy.com>. Should an LEP complaint be filed, the Title VI review process will be followed.

More information on filing an LEP complaint with the Department of Justice can be found at <http://www.usdoj.gov/crt/cor/complaint.php>.

| Minority Representation Table | | | | | |
|---------------------------------------|------------------|---|-----------------------------|---------------------------|--|
| Body | Caucasian | Hispanic/ Latino (of any race) | African American | Asian American | American Indian/ Alaskan Native |
| Pop* | 91.4% | 10.2% | 0.6% | 2.3% | 0.8% |
| Transit Advisory Board | 80.0% | 0% | 0% | 0% | 20% |

[*2019: ACS 5-Year Estimates Subject Tables](#)



FIXED/COMMUTER ROUTE SERVICE STANDARDS POLICY

Vehicle Load Standards

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 40 passengers for a 31' high-floor bus-on-chassis and 56 passengers for a 35' low-floor transit vehicle.

| Vehicle Type | Seated Capacity | Standing Capacity | Total Capacity | Maximum Load Factor |
|---------------------|----------------------------|------------------------------|---------------------------|------------------------------------|
| 31' High-Floor | 26 | 14 | 40 | |
| 35' Low-Floor | 32 | 24 | 56 | |

Vehicle Headway Standards

Service operates on the commuter route between Sandy and Gresham every 30 minutes on weekdays; hourly (60 minutes) on Saturdays; and 8 times on Sundays over a 14 hour period.

Service operates on the commuter route between Sandy and Estacada on Monday – Saturday, 5 times daily over a 12 hour period.

Service operates a shuttle in Sandy weekdays, 5 times a day over a seven hour period.

Scheduling involves the consideration of a number of factors including: ridership, productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Sandy Transit Master Plan and Regional Coordinated Transportation Plan, relationship to major developments, land use connectivity, and transit demand management.

Headways and Periods of Operation

| | Weekday Frequency | | Saturday Frequency | | Sunday Frequency |
|---------------------------------|---|--|---|--|---|
| Commuter Gresham | 30 minutes 16 hours daily | | 60 minutes 17 hours daily | | 8 runs daily subject to schedule over 14 hour period |
| Commuter Estacada | 5 runs daily subject to schedule over 12.5 hour period | | 5 runs daily subject to schedule over 12.5 hour period | | NONE |
| Deviated Shopper Shuttle | 5 runs daily over a 7 hour period | | NONE | | NONE |

DEMAND-RESPONSE SERVICE STANDARDS POLICY

Vehicle load standards

Sandy Transit will operate cutaway vehicles with less than 16 passenger capacity of the local demand-response service. Vehicles must be able to operate on surface streets, in parking lots, residential streets and private driveways. Low-floor vehicles will be considered for this application as equipment and funding become available and reliable. The service area for this service is the Sandy city-limits and up to a 3-mile radius subject to availability.

Demand response also acts as complimentary ADA service all hours of fixed route operation hours.

Service Area and Periods of Operation

| | Weekday Hours | Saturday Hours | Sunday Hours |
|------------------------|----------------------|-----------------------|---------------------|
| Demand-Response | 5:30a-9:00p | 10:15a-4:30p | NONE |

On-Time Performance Standard

The on-time service standard for Sandy Transit per the Transit Master Plan is to maintain a record of 90% on-time service on all routes. A commuter/fixed route vehicle is considered on-time if it departs a scheduled time point no more than 1 minute early and no more than 5 minutes late. The demand-response service allows a 15-minute window on either side of the scheduled pick-up time (while ensuring on-time arrival at set appointments).

The commuter/fixed routes average an on-time performance of 99% and the demand-response services average an on-time performance of 89.6%.

Service Availability Standards

Sandy Transit will operate transit service along the main arterial (Highway 26) with bus stops approximately 3 blocks apart. All city residents will be eligible for special services (ADA) subject to qualification. Sandy Transit will maintain a 0% turn down rate for ADA qualified individuals requesting eligible service by 5 p.m. the previous day. General public demand-response service will be scheduled on a first-come, first-served basis guaranteeing rides booked by 5 p.m. the day prior and same-day service subject to availability.

Vehicle Assignment

Vehicle will be assigned to the commuter/fixed route such that the average age of the fleet serving the routes do not exceed “10” years. Low-floor buses will be deployed on the more frequently used routes. Vehicle equipment will be assigned considering a number of factors including: ridership, productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Sandy Transit Master Plan and Regional Coordinated Transportation Plan, relationship to major developments, land use connectivity, and transit demand management. All buses will be equipped with air conditioning, bike racks, stop request capability, and at least two wheelchair securement stations. Commuter/fixed route stops will be announced by all drivers and/or an automated announcement system that provides visual and verbal announcements.

TRANSIT AMENITY POLICY

Sandy Transit will construct bus shelters whenever feasible at bus stops with at least 10 boardings per day. In the event that there is insufficient funding to install shelters at eligible bus stops, establish a priority list based on the following criteria:

- Number of passenger boardings per day
- Proximity to major activity centers
- Seniors or special-needs population in the vicinity
- Availability of space to construct shelter and waiting area
- Adjacent land use compatibility

In selecting sites for bus stops, preference will be given to locations that can accommodate a future bench or passenger shelter within the public right-of-way, and at locations that operate safely given roadway traffic conditions.

A priority list will be maintained for bus stop benches, where bus shelters might otherwise be warranted, but the ridership isn't high enough or the site is unsuitable.

Bus stop shelters will be located close to ambient lighting whenever possible and shelters will be equipped with solar lighting.