

DRAFT

**Vehicle Accessibility Plan
LETS Transportation
3950 W. Grand River Ave.
Howell, Michigan 48855**

1. Purpose

This accessibility plan is submitted in compliance with Section 10e(18) of the Michigan Transportation Fund Act (MCL 247.660e) (hereinafter “the Act”) and the official administrative rules for administration of Michigan’s Comprehensive Transportation Fund. The purpose of this accessibility plan is to describe the demand-response service provided by LETS Transportation to senior persons and individuals with disabilities. This accessibility plan demonstrates it is the policy of LETS Transportation to comply with the following requirements of Section 10e(18):

- A. That demand-response service is provided to persons 65 years of age or older and individuals with disabilities residing in LETS Transportation’s entire service area. (See attached map defining the service area.)
- B. That as a minimum, demand response service is provided to persons 65 years of age or older and individuals with disabilities during the same hours as service is provided to all other persons in LETS Transportation’s service area.
- C. That the average time required for demand response service to persons 65 years and older and individuals with disabilities, from the initiation of a service request to arrival at the destination, is equal to the average time period required for demand response service provided to all other persons in LETS Transportation’s service area.
- D. That LETS Transportation has established a Local Advisory Council with not less than 50 percent of its membership representing persons 65 years of age or older and individuals with disabilities in LETS Transportation’s service area. At least one member (or 12 percent of membership has been appointed jointly with the area agency on aging). The Local Advisory Council has had an opportunity to review and comment on this plan before its submission to the Michigan Department of Transportation. (See attached Livingston Local Advisory Council minutes)

All rules cited below refer to the official administrative rules for the administration of the Comprehensive Transportation Fund. These rules are found in the Michigan Administrative Code, beginning at Rule 241.4101, et seq.

2. Definition of Senior and Individual with a Disability - Rule 201 (2) (c)

As used in this Accessibility Plan

- (a) “Individual with a disability” means an individual who has a physical or mental impairment that substantially limits one or more of the major life activities of such

individual, a record of such impairment, or being regarded as having such an impairment. See Michigan Administrative Code Rule 247.4101(1)(m).

(b) "Senior" means an individual 65 years of age or older. (Agency Note: Number supplied cannot exceed 65 years.)

3. Number of Senior and Individuals with Disabilities in Service Area - Rule 201 (2) (c)

LETS Transportation estimates that a total of 36,700 persons fitting the above definitions reside in the agency's defined service area.

4. Description of Plan Development Process and Local Advisory Council Involvement - Rule 201(2) (e)

LETS Transportation developed this plan using the following process: (Agency note: Below is a suggested process description. However, step b. below must be included in any process utilized.)

- a. Agency staff drafted a plan, incorporating all information required by R 247.4201 and R247.4202 of the Michigan Administrative Code
- b. The draft plan content was reviewed at a meeting of the Livingston Local Advisory Council, held on **April 11, 2023**, wherein the Local Advisory Council was given opportunity to review and comment on the content of the plan. In accordance with Sec. 10e(18)(d) of the Act, all comments on the plan received at this meeting by Local Advisory Council members are contained in a separate section of this plan, below.
- c. A final draft plan was submitted to and approved by LETS Transportation's governing body.

5. Local Advisory Council Composition - Rule 202

LETS Transportation's Local Advisory Council is currently comprised of five (5) members, which meets or exceeds the required minimum of three members. In accordance with Rule 202, no member of the Local Advisory Council is an employee, executive committee member, or governing board member of LETS Transportation. LETS Transportation ensures that at least 50 percent of its Local Advisory Council membership represents persons who are 65 years of age or older and persons who have disabilities within the agency's defined service area. LETS Transportation further ensures that at least one member of its Local Advisory Council (or one of every eight members, whichever is larger) is approved jointly with the area agency on aging. LETS Transportation further ensures that its Local Advisory Council membership will include people who have diverse disabilities and the senior who are users of public transportation. LETS Transportation's Local Advisory Council is, at the time of adoption and submission of this plan, composed of the following members:

1. LAC Chairperson Name Mark Swanson AAA 1-b

AFFILIATION

This Member is a:

(name of organization if any)

Person with Disabilities

This member is:

Person 65 years and older

Jointly appointed by the area agency on aging

Neither of the above groups

A user of public transportation

Represents one of the above

Neither of the above

2. Andrea Stepien

Citizen at Large

NAME

AFFILIATION

This Member is a:

(name of organization if any)

Person with Disabilities

This member is:

Person 65 years and older

Jointly appointed by the area agency on aging

Neither of the above groups

User of public transportation

Represents one of the above

Neither of the above

3. Steve Pugsley

Citizen at Large

NAME

AFFILIATION

This Member is a:

(name of organization if any)

Person with Disabilities

This member is:

Person 65 years and older

Jointly appointed by the area agency on aging

Neither of above groups

A user of public transportation

Represents one of the above

Neither of the above

4. Doug Anderson

Citizen at Large

NAME

AFFILIATION

This Member is a:

(name of organization if any)

Person with Disabilities

This member is:

Person 65 years and older

Jointly appointed by the area agency on aging

Neither of above groups

A user of public transportation

Represents one of the above

Neither of the above

4. Alice Andrews

Citizen at Large

NAME

AFFILIATION

This Member is a:

(name of organization if any)

Person with Disabilities

This member is:

Person 65 years and older

Jointly appointed by the area agency on aging

Neither of above groups

A user of public transportation

Represents one of the above

Neither of the above

(Agency Note: Provide this information for all Local Advisory Council members)

6. Present Vehicle Inventory – Rule 201 (2) (a)

LETS Transportation’s demand response vehicle inventory presently in service is as follows:

- a. Number of demand response vehicles presently in service purchased using Comprehensive Transportation Fund monies = 32
- b. Number of accessible demand response vehicles presently in service purchased using Comprehensive Transportation Fund monies = 31

7. Anticipated Vehicle Inventory – Rule 201 (2) (b)

LETS Transportation’s anticipated demand response vehicle inventory is as follows:

- a. Number of demand response vehicles in agency’s anticipated fleet which will be purchased using Comprehensive Transportation Fund monies = 32
- b. Number of accessible demand response vehicles in agency’s anticipated fleet which will be purchased using Comprehensive Transportation Fund monies = 31

8. Narrative Summary of Vehicles Requested – Rule 201 (2) (l)

As indicated above, the agency currently operates or plans to operate a total of 32 demand response vehicles. Of these vehicles, the total number that will be fully accessible to seniors and individuals with disabilities is 31 vehicles. The reason for operating or planning to operate this number of accessible vehicles is: The vast majority of the LETS fleet is comprised of accessible vehicles to accommodate the needs of seniors and people with disabilities, who comprise the largest share of our ridership. However, LETS retains at least one non-accessible bus to maximize seating capacity for large group trips where all passengers are ambulatory.

9. Fare Structure - Rule 201 (2) (d)

LETS Transportation’s fare structure that is in use for seniors, individuals with disabilities, and the general public for demand response and fixed route service is as follows:

	General Public	Seniors/Disabled Peak	Seniors/Disabled Non-Peak
Demand Response	\$2	\$1	\$1
Fixed Route	N/A	N/A	N/A

(Agency Note: The example chart above can be modified to reflect local agency service hours, routes, and services. However, agencies must comply with the statutory requirement for preferential fares for individuals with disabilities and persons 65 years of age and older, for off peak periods of service. Preferential fares may not be higher than 50% of the regular 1-way single fare. Refer to the Michigan Transportation Fund Act, MCL 247.660e ,Sec. 10e (4) (a) (iii).)

10. Map and Narrative Description of Service Area – Rule 201 (2) (f)

For demand-response service, LETS Transportation’s Service Area is the entirety of Livingston County and the portions of the South Lyon—Hamburg—Genoa, MI Urban Area that are outside of Livingston County. In addition, LETS provides limited regional service to surrounding counties.

Refer to the attached map of LETS Transportation’s service area, depicting LETS Transportation’s service area and routes.

11. Service Schedule – Rule 201 (2) (g)

LETS Transportation’s current service schedules, including hours of day and days per week for demand response service is as follows:

Monday-Friday: 6:00am – 9:00pm

Saturday: 7:00am-7:00pm

Sunday: 7:00am-5:00pm

12. Schedules in Alternative Formats – Rule 201 (2) (h)

LETS Transportation has made arrangements to produce copies of its current service schedule in an alternative format that can be utilized by persons who are blind or have other disabilities.

13. Vehicle Availability On Other Than Regular Service Hours and Days – Rule 201 (2) (i)

LETS Transportation does make demand-response service vehicles available for use during hours or days other than regular service hours and days. LETS Transportation confirms that accessible transit vehicles are available for use by the senior and individuals with disabilities to the same extent as the general public.

14. Advance Requests for Demand Actuated Service – Rule 201 (2) (j)

LETS Transportation does not require that the senior, people with disabilities, and the general public must make an advance request to obtain demand response service. However, on-demand or same-day service cannot be

guaranteed at all times. For guaranteed availability the required advance request time period is 2 days.

15. Constraints on Capacity and Restrictions on Trip Purpose – Rule 201 (2) (k)

LETS Transportation provides service to all customers within the following constraints on capacity and restrictions on trip purpose: As noted above, capacity constraints limit the availability of on-demand or same-day service availability. Regional service to surrounding counties is constrained by vehicle availability and limited to medical trip purposes.

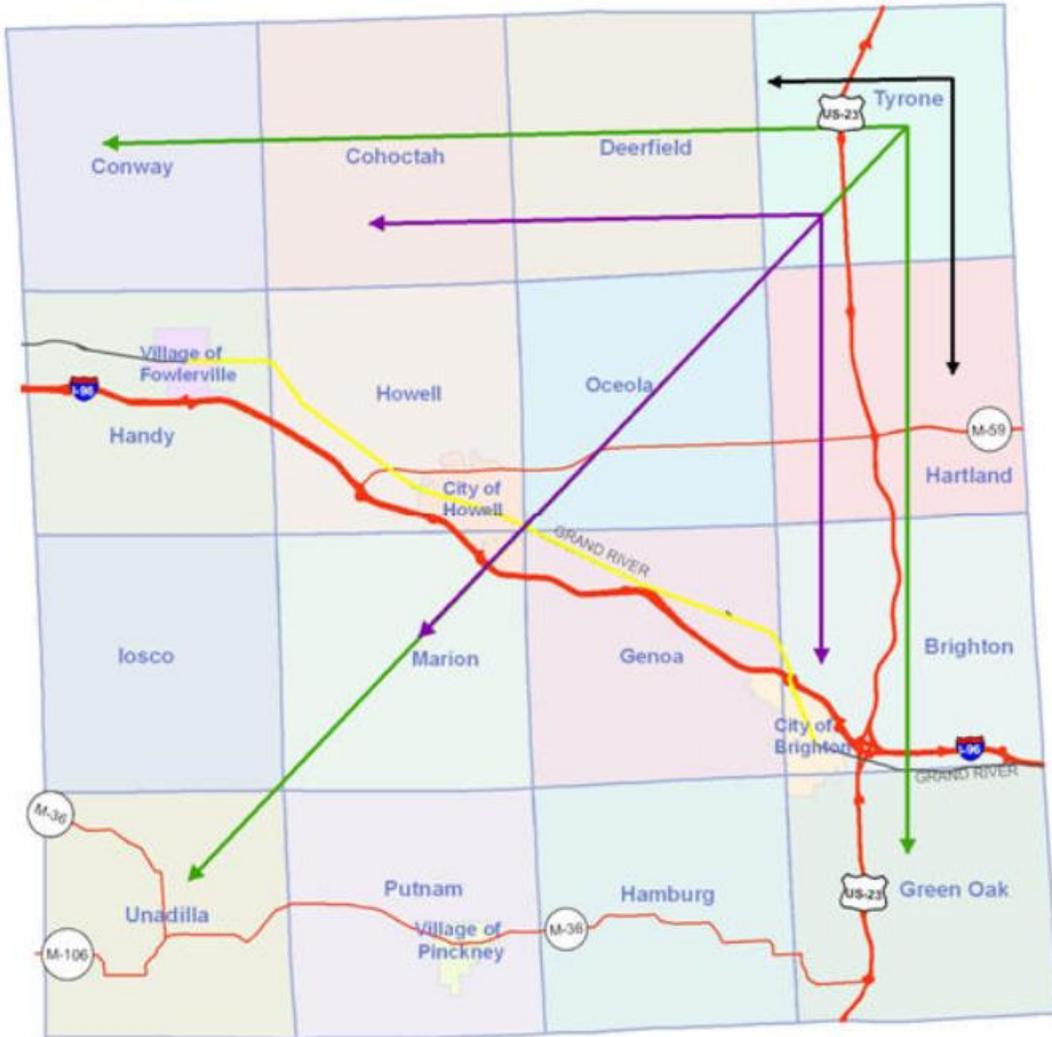
16. Local Advisory Council Comments on this Plan – Rule 201(2) (m)

LETS Transportation's Local Advisory Council members made the following comments about this plan: N/A

17. Agency Response to Local Advisory Council Comments on the Plan – Rule 201 (2) (n)

LETS Transportation made the following response to its Local Advisory Council regarding the above comments: N/A

Attachment A – Service Area Map



Fares are based on zones (townships) traveled through. Please have exact fare as drivers cannot make change.

Traveling	Legend	Regular Fare	Seniors & Disabled Fares
Within Township	→	\$2	\$1
To Adjacent Township	→	\$2	\$1
2 Townships Away	→	\$4	\$2
3 Townships Away	→	\$6	\$3
Regional (Surrounding Counties)		\$20 round trip	\$10 round trip