



**REPORT OF PUBLIC COMMENTS REGARDING  
THE PROPOSED PARATRANSIT PLAN**

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*June 13, 2019*

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## Summary

RTS Access held a Public Hearing on April 02, 2019 about the Proposed Paratransit Plan. The proposed changes for Summer of 2020 are to adjust the service area, adjust the service span, and to change the fares. The Plan also proposed operational policy changes for implementation in summer or fall of 2019 or when feasible. The proposed operational policy changes are to update the categories of eligibility certification, change the number of days a person can reserve a ride in advance from 7 days to 5 days, further clarify the Service Infractions and Suspensions policy, adjust the 20 minute pickup window to 5 minutes before the pickup time and 15 minutes after the pickup time, and introduce the No Strand policy.

This report presents the public comments to the Board of Commissioners and our responses to the comments.

We accepted verbal comments from registered speakers during the Public Hearing, which were transcribed by a stenographer. We accepted written comments via USPS hardcopy letters addressed to General Counsel or via the online Contact Us form. The period for comments was April 02, 2019 to April 16, 2019.

There were 34 total participants. We received 18 comments verbally from registered speakers at the public hearing, 12 comments in the form of written letters, and 8 comments submitted in writing electronically through Contact Us. We reviewed the comments, identified 15 topics, and tallied comments about each topic.

Topic	Total Comments
Fare	25
Service Span	12
Service Change	11
Sustainability	8
Service Area	5
Scheduling Hours	5
5-Minute Window	5
Sedan Policies	4
Eligibility	3
Advance Reservations	2
Accessible Technology	1
Hold Times	1
Fleet Changes	1
Trip Negotiations	1
Service Infractions	1

After evaluating the comments, we recommend these changes to the Paratransit Plan:

1. In response to concerns about the cost of supplemental service, we are changing the fare for supplemental service in Level 2 during weekdays to \$4.00 per trip.

2. In response to the concerns about service span, we are extending paratransit service hours in supplemental Level 2 and Level 3 to 10:00 PM on weekdays.
3. We will update the Plan to reflect that all Community Mobility Zones will be served by RTS On Demand.
4. In response to the concerns about service span, we are extending RTS On Demand service hours in the CMZs to run later on weekdays and weekends.
5. We will update the description for the new route for 8 Chili to include the segment that will travel from Chili Avenue down Jetview Drive to Paul Road and take Marshall Road to Chili Avenue. This will be in Exhibit 1: Reimagine RTS Fixed Route System Descriptions.
6. We will update the language regarding children in sedans to state that children under age eight or physically smaller than recommended will be transported in a sedan if the parent provides and installs the appropriate child safety seat (2.4.B. Responding to Requests for Rides).
7. We will update the language to state that RTS Access will transport service animals in sedans. Should the service animal begin to act disruptively or aggressively at pickup, the Operator will provide the customer with additional time to return the service animal to the residence if the customer still wants to take the ride without the service animal (2.4.B. Responding to Requests for Rides).
8. We will clarify the language in the Plan and the Paratransit Eligibility Policy to state that non-certified individuals are prohibited from using the Access ID card of a certified eligible person to ride paratransit or to ride fixed route or on demand service at no cost (Exhibit 11: Eligibility Certification).

We continue to recommend the following activities when the final Paratransit Plan goes into effect:

1. Provide the Paratransit Plan in accessible formats.
2. Develop a Paratransit Rider's Handbook in accessible formats.
3. Develop a list of Frequently Asked Questions on the website [www.myrts.com](http://www.myrts.com).
4. Hold information and education sessions to answer frequently asked questions about paratransit.
5. Develop a process to indicate door-to-door as a reasonable modification for customers who need it routinely (all or most of the time) due to their disability and in order to use the service.
6. Develop alternate accessible formats for customer surveys, ADA complaints, and Reasonable Modification complaints.

## RTS Access Response to Public Comments

### Fares

Lorraine Garver, Matthew Crowley, Charles Tremblay, Shannon Fisher, Marjorie Rose, Lindsay Tersmette, Maddy Pope, Angelo Ercolamento, Karen Moses, Lois Hines, Norma Hines, Janie Pehur, Marilyn Rizzo-Ferris, Scott Davis, Paula Mathews, Roger Livingston, Ericka Jones, Margaret Gorrow, Justin Young, Teresa Rand, Adam Pehur, Anthony Griggs, Rene Latorre, and Ernest Haywood expressed concerns about the proposed paratransit fares.

- In response to your public comments, we are changing the fare for trips in Level 2 to \$4.
- One of our biggest challenges as a public transit provider is that our costs continue to grow at a rate greater than that of the funding we receive from various government entities. For Paratransit service, a typical ride costs RTS more than \$40, which means we must subsidize a significant portion of that cost. Through Reimagine RTS, we were able to make sure that nearly 90 percent of RTS Access customers see no increase in fares. In order to achieve our goal of serving all current paratransit customers when we launch the new system in the summer of 2020, we will go beyond what we are required to do by law. The only way we can make that happen is to right size the fare. By doing this, we can maintain service for RTS Access customers and at the same time ensure the fares remain lower than those charged by Uber, Lyft, cabs and other transportation providers. We understand the challenge this may present for some customers, but when faced with the decision to either maintain service by right sizing fares or reduce service, the message we heard from leaders in the community is that maintaining service is of greater importance.
- The addition of service in the Community Mobility Zones (CMZ) will be beneficial for RTS Access customers. In addition to being an expansion of service available to customers today, it will be free for RTS Access-eligible customers. If you are traveling between destinations within a specific CMZ, you will have the option of scheduling a ride via RTS Access at the proposed rates, or scheduling a ride using the CMZ service for free. Additionally, if you need to use the CMZ service to connect to the paratransit service area on the weekend, your trip using the CMZ service will be free.

Deb Muratore needed clarification about the payment of fares in Level 2.

A customer traveling in the supplemental Level 2 of the paratransit area on RTS Access can pay the \$4 fare per trip using the \$20 Value Pass. Any customer who purchases a \$20 Value Pass will receive the equivalent of \$22 in fares. Customers can also pay the \$4 fare for the trip in cash using exact bills and coins.

End of response to comments about Fares.

## **Service Span**

Lindsay Tersmette, Maddy Pope, Angelo Ercolamento, Karen Moses, Lois Hines, Norma Hines, Marilyn Rizzo-Ferris, Deb Muratore, and Paula Mathews expressed concerns about the service hours curtailing the ability of customers who work night shifts or need to do their shopping and errands in the evening or on weekends. Deb Muratore asked what Greece riders are to do if they need a ride on the weekend or after 7:00 PM. Rene Latorre expressed that ending services at 7:00 PM on weekdays is unreasonable and that all CMZs should have the same hours.

- In response to the public comments about service span, RTS Access will provide service hours from 5:00 AM to 10:00 PM on weekdays in Level 2.
- The proposed days and hours of service for paratransit service and RTS On Demand allow RTS and RTS Access to fulfill the demand based on our resources.
- The current paratransit system does not offer extensive weekend service or extensive availability for those working late shifts, and this will remain so in the proposed system. We are exceeding the federal requirements for both our current system and the proposed system.
- The Paratransit Plan proposes complementary paratransit for the required service area and for the Level 1 supplemental service area. The paratransit service for these areas would run until midnight Monday to Sunday, including holidays. Both areas overlap significantly with the Greece, Henrietta, and Irondequoit community mobility zones.
- The Reimagine RTS Plan will propose RTS On Demand service for all Community Mobility Zones. In response to public comments about service span, the RTS On Demand service will run longer.
  - The Brockport RTS On Demand service will run 5:00 AM to 10:00 PM during weekdays. Service will run 6:00 AM to 10:00 PM on Saturdays and 6:00 AM to 6:00 PM on Sundays and holidays.
  - The Greece and Henrietta RTS On Demand service will run 5:00 AM to midnight during weekdays. Service will run 6:00 AM to midnight on Saturdays and 6:00 AM to 10:00 PM on Sundays and holidays.
  - The Irondequoit RTS On Demand service will run 5:00 AM to 10:00 PM during weekdays. On weekends and holidays, service will run 6:00 AM to 10:00 PM.
  - The Lexington RTS On Demand service will run 5:00 AM to 10:00 PM during weekdays only because the area served is primarily industrial.
  - The Pittsford / Eastview and Webster RTS On Demand service will run 5:00 AM to 10:00 PM during weekdays, 6:00 AM to 10:00 PM on Saturdays, and 6:00 AM to 6:00 PM on Sundays and holidays.

Teresa Rand was concerned that the proposed service span would not allow her to attend concerts in the Charlotte area, since many concerts begin at 7:00 PM.

- The proposed fixed route system and paratransit system will allow customers to participate in activities held at Ontario Beach and the Charlotte recreation facilities. In the new system, the fixed route (22 Lake) will go to Ontario Beach and Charlotte recreation facilities Monday to Sunday until midnight. In the new system, complementary paratransit will also serve Ontario Beach and Charlotte recreation facilities Monday to Sunday until midnight.

End of response to comments about Service Span.

### **Service Change**

Marty Reeners and Ernest Haywood expressed concern for how the change to 8 Chili in the fixed route system would affect those Lifetime Assistance serves and employs.

- The proposed route for the outbound 8 Chili (from the RTS Transit Center) will travel from Chili Avenue down Jetview Drive to Paul Road and then return to Chili Avenue by Marshall Road. It will pass by 425 Paul Rd. (Lifetime Assistance). Marshall Road is less than 1000 feet from 465 Paul Rd.

Lorraine Garver, Matthew Crowley, Charles Tremblay, Shannon Fisher, Janie Pehur, Marjorie Rose, Roger Livingston, Adam Pehur, Anthony Griggs, Bernice Bird, Rene Latorre, and Carol Borsa expressed concerns that the proposed service change will result in loss of service.

- We developed the Plan for the entire list of customers so that we cover as many customers as we can within our resources. While some customers' experiences and costs may be different, they will still have a ride.
- RTS Access is open to a subsidized contract to provide service to a program center.
- Where there is historic low-use of fixed route service, we are scaling the service to the demand. We urge all customers of fixed route and paratransit to understand that shifting away from "the way we've always done it" does not equate to "no more service." Brockport, Greece, Henrietta, Irondequoit, Lexington, Pittsford/Eastview, and Webster will be served by RTS On Demand, which is a model of service scaled more appropriately to the geographic areas and the level of demand.
- The CMZs and hubs are options to use in addition to the paratransit service areas (Required, Level 1 Regular, Level 2, and Level 3). Business decisions for paratransit are not tied directly to the usage of On Demand service and connection hubs. We proposed



the paratransit service area knowing that the levels are designed to serve existing paratransit eligible customers.

- The supplemental service areas do not have a requirement to schedule trips regardless of trip purpose. When scheduling trips in Levels 2 and 3, we have the flexibility to give priority to trips for work, day-treatment programs, or dialysis, to reduce the fears and uncertainty people feel about the new system.

Deb Muratore asked about the review period after the plan is implemented.

- During the winter and spring of 2020, Marketing and Communications will conduct outreach and educational sessions. Any member of the public can continue to offer comments during information or outreach sessions, during Board Meetings, or by using the online [Contact-Us form](#), or by calling Customer Service at 585-288-1700.

Bernice Bird expressed concern with the policy for notifying customers about service changes.

- The “Notifications Regarding Changes to the RTS Access Service Area Policy” states that customers affected by a service area change will have a period of at least 120 days where they can continue to travel to the affected areas. We will tell you 30 days in advance of the change and you have an additional 120 days from the notice or 90 days from the effective date until you cannot schedule rides to the affected area.
- For example, if a change to the service area will go into effect on July 31, 2025, we would have to tell you about it by July 1, 2025. Then, you have until October 29, 2025 to continue scheduling your rides as usual. From July 1 to October 29, nothing would change. However, you would need to work with Schedulers to look at other ways of planning your trips.
- The Genesee Transportation Council’s [Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan Update](#) provides a list of Community Transportation Providers in the Central Region (pages 4—5 to 4—9). The Plan also discusses a strategy of developing a centralized resource directory of transportation providers for target populations (low income, seniors, and persons with disabilities).

End of response to comments about Service Change.

## **Sustainability**

Angelo Ercolamento, Gidget Hopf, Marilyn Rizzo-Ferris, Adam Pehur, Rene Latorre, Carol Borsa, and Deb Muratore expressed skepticism and concern that the proposed service area was sustainable and asked about the processes involved if the system needed to change again.

- While federal law does not obligate RTS Access to provide complementary paratransit service beyond  $\frac{3}{4}$  mile of each fixed route, we are demonstrating our commitment to people with disabilities with the additional service proposed in Levels 1, 2 and 3.
- At different periods, customers have expressed concerns that paratransit service beyond what is required will go away, but RTS Access has demonstrated our commitment over the past many years by providing paratransit service well beyond that which is required by federal law.
- We explain in our Paratransit Plan that, should changes occur to the Community mobility zones (Level 2/Orange), the current geography for Level 3 would not change until which time our Board of Commissioners deems necessary. If a Community Mobility Zone were to grow, parts of Level 3 (Gray) would become Level 2 (Orange). If a community mobility zone were to shrink, the Level 3 geography would remain the same as it has been initially proposed in the plan and some of the Level 2 area would become Level 3.
- Any major service change will need to go before the public for comment in the form of at least one Public Hearing with a public comment period and then go before the Board of Commissioners for review. After implementation, the public can continue to offer comments during Public Information Sessions or Board Meetings, or by using the Contact Us form, or by calling Customer Service.
- Each paratransit trip costs approximately \$40. For most trips, we receive \$2 from each customer, leaving a subsidy of approximately \$38 per trip to be covered by federal, state, and local funding. We recognize that changing or adjusting fixed route fares would impact all customers in the same way any fare change impacts a paratransit customer. True sustainability requires not just taxpayer support; it also requires community support. We encourage everyone to join the Coalition of New Yorkers for Better Public Transit to give support. True sustainability also comes from public or private subsidy partnerships. If you know of a company or organization that may be willing to partner with us, please contact us.

End of response to comments about Sustainability.

## **Service Area**

Teresa Rand, Ericka Jones, Alicia Zona on behalf of Dorothy De Croce, Karen Moses, and Anthony Griggs expressed concerns with their ability to travel to specific geographic areas in the proposed service area. Teresa Rand was concerned that the proposed service area would not allow her to travel to concerts in the Charlotte area, since many concerts begin at 7:00 PM.

- The Paratransit Plan proposes complementary paratransit for the required service area and for the Level 1 supplemental service area.
  - The paratransit service for these areas would run until midnight Monday to Sunday, including holidays. Both areas overlap significantly with the Greece, Henrietta, and Irondequoit community mobility zones.
- The Reimagine RTS Plan will propose RTS On Demand service for all Community Mobility Zones. In response to public comments about service span, the RTS On Demand service will run longer.
  - The Brockport RTS On Demand service will run 5:00 AM to 10:00 PM during weekdays. Service will run 6:00 AM to 10:00 PM on Saturdays and 6:00 AM to 6:00 PM on Sundays and holidays.
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  - The Irondequoit RTS On Demand service will run 5:00 AM to 10:00 PM during weekdays. On weekends and holidays, service will run 6:00 AM to 10:00 PM.
  - The Lexington RTS On Demand service will run 5:00 AM to 10:00 PM during weekdays only because the area served is primarily industrial.
  - The Pittsford / Eastview and Webster RTS On Demand service will run 5:00 AM to 10:00 PM during weekdays, 6:00 AM to 10:00 PM on Saturdays, and 6:00 AM to 6:00 PM on Sundays and holidays.
- The proposed fixed route system and paratransit system will allow customers to participate in activities held at Ontario Beach and the Charlotte recreation facilities. The fixed route (22 Lake) travels to and from Ontario Beach and Charlotte recreation facilities Monday to Sunday until midnight. Complementary paratransit would service the same location Monday to Sunday until midnight.

Ericka Jones was concerned for people in West Henrietta, Rush, Lima, and Webster to have the ability to get to doctor's appointments in the City.

- The current complementary paratransit service area does not include West Henrietta, Rush, Lima, and Webster. The proposed service area focuses on providing service to as many of those who were covered in the old service area as possible. Providing greater coverage could be done if RTS Access charges a much higher premium cost for service extending to areas such as Rush and Lima.

Alicia Zona asked on behalf of her mother Dorothy De Croce where 154 Boca Ave in Greece would fall within the new service area.

- In the proposed paratransit service area for summer 2020, the address will be in Level 1 (Regular) which will cost \$2 per trip and will allow advance trip reservations, will guarantee trips, and will allow for time negotiations.

Karen Moses expressed concern that the proposed service area would negatively affect paratransit riders.

- The proposed service area exceeds the federal requirements and includes as many of our existing paratransit customers as possible.

End of response to comments about Service Area.

## **Scheduling Hours**

Angelo Ercolamento, Scott Davis, Justin Young, Bernice Bird, and Heather Bird expressed concern about shorter scheduling hours on Saturdays and Sundays.

- We are reducing Scheduling hours on Saturday and Sunday to 1:00 PM because call volume after 1:00 PM is low and we want to reallocate Schedulers for when the call volume averages are high, which is typically during weekdays. The proposed Scheduling hours are based on our budget and resources.
- We are working on an online scheduling option to increase flexibility.
- Currently, the Scheduling office is staggering lunches and is open between 11:30 AM and 12:30 PM to take calls.
- In the proposed Plan, customers can schedule rides over the phone with a live Scheduler on the following days and times:
  1. Monday through Friday between 8:00 AM and 5:00 PM; and
  2. Saturday and Sunday between 8:00 AM and 1:00 PM; and
  3. New Year's Day, Memorial Day, Independence Day, Labor Day, and Thanksgiving Day between 8:00 AM and 1:00 PM. The Scheduling office will be closed on Christmas day.
- Dispatchers will schedule same-day trips when the Scheduling office is closed.

End of response to comments about Scheduling Hours.

## **5-Minute Window**

Shelly Perrin, Samuel Lee, Teresa Rand, and Anthony Griggs asked RTS Access to consider a longer period for the bus to wait to allow customers to board.

- The 5-Minute Window will not change. Extending the 5-Minute Window for pickups will increase dwell times, fundamentally change our operations, and make all paratransit customers wait longer for their pickups.
- Typically, customers know the pickup time well in advance, which allows them to be ready the majority of the time. Customers or attendants have the ability to confirm the ride through an automated system or by speaking with a live person.

End of response to comments about 5-Minute Window

## **Sedan Policies**

Bernice Bird and Heather Bird pointed out issues with the current practices and policies related to transport of service dogs and children in sedans.

- We will revise the wording of the policies to reflect that 1) service animals are allowed in sedans; 2) additional time will be provided if the handler wants to take the trip without a misbehaving service animal so that the handler can take the animal back to a residence; and 3) a parent who wishes to travel with a child in the sedan must provide a child safety seat and install it at the time of the ride.
- We will continue to remind all staff that customers have a right to travel with their service animals. A customer may travel with more than one service animal. More than one customer may travel with a service animal during the same trip. It is a violation of RTS values and of ADA regulation to treat customers with service animals less favorably than customers without service animals.

End of response to comments about Sedan Policies.

## **Eligibility**

Janie Pehur asked RTS Access to honor the eligibility status of all rider ID's through expiration dates as it can take years to find new homes and jobs.

- Any customer living in Monroe County can apply for paratransit eligibility. A person certified as paratransit eligible remains eligible even if a service area changes. The certification can be renewed or recertified as eligible when it expires (either annually or every three years).
- The service area is different from eligibility. Should a customer live outside the service area, it does not define their eligibility.
- A person who is eligible for paratransit but lives outside the service area is responsible for getting to a location within the service area in order to use supplemental or complementary paratransit service (and vice versa).

Pam Taggart requested year-round eligibility for herself and her sister Pat.

- A customer's type of eligibility will be reviewed when he or she submits the application for recertification. Outside of the recertification process, customers can submit a new application if their condition changes and they want to be considered for a change in eligibility.

- Customers and applicants have the right to appeal eligibility decisions following the process described in Paratransit Appeal Process and Procedures (Exhibit 11: Eligibility Certification of the Paratransit Plan).

Bernice Bird requested to see the training, curriculum, and job qualifications of the eligibility staff.

- The ADA Certification Coordinator follows the guidance in FTA Circular 4710.1, Chapter 9 – ADA Paratransit Eligibility and the Code of Federal Regulations Title 40 – Subtitle A – Part 37 – Transportation Services for Individuals with Disabilities (ADA), Subpart F- Paratransit as a Complement to Fixed Route Service. Of particular importance are the following sections:

§37.123 ADA paratransit eligibility: Standards; and

§37.125 ADA paratransit eligibility: Process; and

§37.127 Complementary paratransit service for visitors; and

Appendix D to Part 37 - Construction and interpretation of Provisions of 49 CFR Part 37, Section 37.123 ADA Paratransit Eligibility-Standards.

- The ADA Certification Coordinator is responsible for processing and coordinating applicant eligibility for Access Ridership under the ADA act. An essential function of the job is to assess an applicant’s functional skills to ride the fixed route bus system. This is very important because two individuals with the same diagnosis may have different functional skills.
- Other functions of the job are to review applications, determine paratransit eligibility, attend appeal meetings, and provide information to the Appeal Committee. An Associate’s degree is required for the position.
- The current ADA Certification Coordinator has 25 years of experience working in the disability and education field and has had the following training:
  1. Comprehensive ADA Paratransit Eligibility – provided by National Training Institute, Rutgers – Edward J. Bloustein School of Planning and Public Policy
  2. Promoting Use of Fixed Route Transit by People with Disabilities – National Training Institute
  3. ABBG Paratransit Expert Workshop – Paratransit and eligibility best practices
  4. Transit Supervisor Certification Course – Transportation Safety Institute, U.S. Department of Transportation

Bernice Bird also asked about the policy for visitors and eligibility.

- Regarding visitors, RTS Access applies the exact requirement from the federal regulations, which reads as follows:

§37.127 Complementary paratransit service for visitors.

(e) A public entity shall make the service to a visitor required by this section available for any combination of 21 days during any 365-day period beginning with the visitor's first use of the service during such 365-day period. In no case shall the public entity require a visitor to apply for or receive eligibility certification from the public entity before receiving the service required by this section.

- By federal regulation, we must first allow an eligible visitor to use the system for any combination of 21 days during any 365-day period. If a visitor knows he or she will be in the Rochester area for a period that amounts to more than 21 days out of a year, then the visitor can go through the full application process to apply for eligibility certification for RTS Access.
- If someone wants to use paratransit in Rochester, he or she can apply for certification with RTS Access.
- Paratransit in Syracuse is provided by Centro Call-a-Bus, a subsidiary of the Central New York Regional Transportation Authority (Centro). The Rochester-Genesee Transportation Authority does not have jurisdiction over Centro's services. If a person wants to use paratransit in the Syracuse area for longer than 21 days out of a year, the person would need to complete an eligibility application for Call-a-Bus and submit it to Centro and be determined paratransit eligible.

End of response to comments about Eligibility.

## **Advance Reservations**

Angelo Ercolamento and Justin Young expressed concern about shortening the number of days for advance reservations from five to seven.

First, we want to clarify that RTS Access is not reducing scheduling from seven days a week to five days a week. We are proposing to change the number of days in advance a person can book the trip. So, seven days a week you can call during the Scheduling Hours and book a ride 1, 2, 3, 4, or 5 days in advance of when you need that ride. This applies to the Required Area, Regular Area (Level 1), and Level 2.

For Level 3, you can call seven days a week during the Scheduling Hours and request a ride one day in advance.

You can call seven days a week when Scheduling is closed and request a same-day ride through a Dispatcher.

We are moving to five-day advance scheduling so that more customers will know where they want to go with greater certainty, which will reduce advance cancellations and allow more customers to get their desired pickup times.

### **Accessible Technology**

Scott Davis expressed concern that online technology will not be compatible with JAWS® (Job Access With Speech) or other screen readers.

We are currently working with vendors to identify accessibility criteria for any online technology we provide as part of the new paratransit, fixed route, or On Demand systems.

End of response to comments about Accessible Technology

### **Hold Times**

Teresa Rand expressed concern over telephone hold times lasting more than 20 minutes.

Currently, RTS Access has phone lines for questions or requests unrelated to trip reservations. Customers can reduce hold times for those who are scheduling trips by using the appropriate phone lines designated for other types of calls. These phone numbers are online at [Calling RTS Access](#).

In the future, “PASS Web” will provide customers with capability to confirm, cancel, and book their own trips over the Internet. We expect the online scheduling application to reduce the number of real-time calls to Schedulers and eventually decrease hold times.

End of response to comments about Hold Times.

### **Fleet Changes**

Deb Muratore asked about electric buses and the old fixed route buses.

A detailed chart regarding bus replacements and electric buses is available online at [https://www.myrts.com/Portals/0/R-GRTA\\_2019-22%20Comp%20Plan\\_FINAL.pdf](https://www.myrts.com/Portals/0/R-GRTA_2019-22%20Comp%20Plan_FINAL.pdf). Page 50 of the 2019-22 Comprehensive Strategic Plan provides the number of buses, the costs, and the year in which R-GRTA has budgeted to do the replacement.

End of response to comments about Fleet Changes.

### **Trip Negotiations**

Bernice Bird pointed out inconsistencies she has experienced regarding trip negotiations.



We agree that Scheduling should consistently provide trip time negotiations for trips within the Required area. In the current system, trip negotiations are applied to the Required service area only and none of the supplemental trips. For the proposed system, trip negotiations are necessary for trips requested in the Required, Regular (Level 1), and Supplemental Level 2 service areas. The difference between the proposed and current systems may be contributing to perceptions of inconsistency. Nevertheless, the Director of Paratransit will reiterate the importance of trip negotiation to the Schedulers. Additionally, if such a situation occurs, please report it immediately using [Contact-Us](#) or by calling Customer Service at 585-288-1700 or RTS Access Operations at 585-654-0747. Please provide the details and date when you made your request; this will allow Management to work directly with the Schedulers and provide retraining as necessary.

End of response to comments about Trip Negotiations.

### **Service Infractions**

Rene Latorre asked RTS Access to increase the threshold for Service Infractions from 5% to 10% for customers with Unconditional (All-Trip) eligibility.

RTS Access will apply the “Paratransit Service Infractions and Suspensions” policy and the 5% threshold to all certified eligible customers, regardless of their eligibility type. The proposed policy states the following:

“Missing or cancelling a trip due to a reason beyond your control is not a ‘Service Infraction.’ Examples of such situations include if you are suddenly ill, have a medical or family emergency, or must care for an ill family member. . . . We will not penalize you if we make errors that cause you to miss a trip. Examples of such situations include scheduling your ride incorrectly, arriving at the wrong location for your pickup, leaving before the Pickup Period begins (early departure), or arriving after the Pickup Period. . . . If you have a sudden conflict that will prevent you from taking your trip, please tell us before your pickup. If you are unable to tell us before your pickup, contact us as soon as possible. It is important to contact us before the 15th of the following month so that we do not count the missed trip as a Service Infraction when we review your trip usage.”

RTS Access will be diligent about the practice of excusing missed or cancelled trips due to unforeseen circumstances when the customer alerts us to said circumstances within the stated period. We will apply the same threshold consistently to all customers because a habitual pattern of missed trips affects the service for all customers. We are seeking to curtail the behavior of not using reserved trips responsibly, when the person routinely makes a deliberate choice not to use the reserved ride out of preference rather than necessity.

RTS Access used trip data to develop the 5% threshold and calculation process. We do not expect the method to cause undue infractions. However, if such a trend develops, we will seek to understand the root causes and apply appropriate changes.

Rene Latorre also expressed concern about staff asking customers for proof of their circumstances.

Thank you for pointing out that some customers were asked for proof, such as a hospital record or doctor's note, while others were not. We ask for your patience as the staff transitions through the implementation of new policies. The staff is aware that new policies are proposed, but until the Board approves them, the policies are not officially active. Staff may be using past practices or policies. The Director of Paratransit will address this with the Scheduling team.

In the proposed Paratransit Plan, written proof is not required when a customer requests an excuse for a missed trip. The customer must 1) contact a Scheduler before the 15<sup>th</sup> of the following month and 2) verbally explain what happened. If there is uncertainty whether the circumstance was beyond the customer's control, the Scheduler should escalate the decision to the Manager of Operations or the Director of Paratransit. Once the proposed Service Infractions and Suspensions policy is in effect, we encourage anyone who believes that the policy is not being implemented correctly to immediately report the incident using [Contact-Us](#) or by calling Customer Service at 585-288-1700 or RTS Access Operations at 585-654-0747.

The current proposed Paratransit Plan only requires written justification from a third party when an appellant wants to reschedule an Appeals hearing (Exhibit 11: Eligibility Certification, Paratransit Appeal Process and Procedures, 5.2 Scheduling an In-Person Hearing). The text in section "5.2 Scheduling an In-Person Hearing" is as follows:

"RTS Access will work with the appellant to find a mutually convenient time for the hearing. Once a hearing is scheduled, it cannot be rescheduled unless the appellant provides justification for why he or she is unavailable on the scheduled hearing date. RTS Access reserves the right to request evidence of the appellant's unavailability including letters from doctors, employers or other professionals. If the appellant is unavailable on the originally scheduled hearing date and can provide a justifiable cause, RTS Access will reschedule the hearing for the following month. RTS Access will allow one such scheduling exception per appeal."

End of response to comments about Service Infractions.  
End of RTS Access Response to Public Comments

## Public Comments

### Bernice Bird

Bernice spoke at the Public Hearing on April 02, 2019. She also submitted written comments through the online Contact Us form. Her comments are about Sedan Policies, Scheduling Hours, Negotiations, Eligibility, and Service Change.

#### **Bernice's Verbal Comments from the Public Hearing Transcript**

"Okay. So I firmly believe that when you speak out about something, you should say what's good and what you're concerned about. So I think the short-term subscription, these things are really a good improvement: Short-term subscriptions; the recognition that circumstances beyond our control can make us late or miss our ride because when they enacted the two-hour window for cancelling they said: No reason is going to be accepted why you missed it if you don't call two hours ahead. I think the reasonable modification is an improvement. The fact that dispatchers are going to be able, according to the plan, to schedule same-day rides when the scheduling is closed."

"Now for the things I don't care for. In the past, service dogs have not been allowed to ride in the sedan. And I'm here to say: If your dog is under control and you have that dog on the floor, it's discriminatory not to let us ride in a sedan. I have trouble getting up the steps a lot of times and I don't want to take these lifts because I have balance problems. So frankly, a sedan would be way more accessible to me, but I cannot ride one because -- and if someone's dog jumps up on the seat and they don't get them down off the seat, or their dog is not well behaved, they should be handled individually and not penalized me for a poor handler's experience in the car."

"The next area I want to talk about is children in a sedan. I understand the law in New York State that was explained in the proposal. So to ride in a sedan, a child has to be 80 pounds, eight years old or 4 -- and 4.9 feet tall. I think that it's discriminatory again to parents to not allow the parent to bring an acceptable legal child restraint seat and put it -- install it in the car and ride in a sedan. It would be the parent or the adult with the child, their responsibility to do that."

"I have a problem with the scheduling hours. I work eight to five. They're open eight to five. They are closed 11:30 to 12:30 for people to have lunch. My lunch is 11:30 to 12:30. There's no time, except on weekends, for me to call. Most call centers stagger lunches and break. It's a common practice. Right Carol?"

"Okay. Next page. Okay. Well, I will submit the rest online."

## **Bernice's Written Comments from the Comment Period**

### RTS Access proposal comments

There are many exciting positive changes in the RTS Access proposal. I am a firm believer that it is as important to note positive changes as well as perceived negative proposed changes.

Some of the changes I view as positive are; no strand policy, same day rides can be scheduled by the dispatcher when scheduling is closed, online scheduling, short-term subscriptions, reasonable ride modifications, consideration of circumstances beyond the rider's control when determining a violation, using the consideration of effort and risk when determining eligibility and many more.

Now for the proposed changes of concern.

#### 1. Guide dog/service dog discrimination.

Service dogs are not allowed to ride in one of the sedans. My dog is never allowed on the seat of a car or any other transportation. She lies at my feet on the floor out of the way of other passengers. One time I was scheduled for the sedan by mistake, as stated by the driver. He insisted that he HAD to drop me off before picking up his other passenger even though it would make him late for that passenger. My dog was lying quietly on the floor in front of my feet. She didn't even have her head on the middle hump. There was no reason for his actions. As the handler, it is my responsibility to make sure my dog is under control and not taking up room that someone else might need.

All dog handlers are responsible to keep their dogs under control. If the dog is out of control, the passenger should be allowed to return the dog to their home, while the driver waits up to five minutes for the passenger to return to the bus. We are individuals, and no passenger should have to endure unfair or unreasonable policies because of a poorly behaved dog. If a person with blond hair uses vulgar language on the bus, would you tightly regulate all blonds language? Of course, you wouldn't. So, if a specific person's dog is causing a problem, please resolve the issue with that person instead of making blanket policies that effect all dog users.

I have to speak to an unwritten policy about dogs. Some schedulers and drivers are under the impression that there cannot be more than one service dog on the bus at a time. I have ridden on a bus with at least 5 service dogs before this unwritten policy went into effect and there was no problem.

A driver harassed me and a friend coming home from church one night because we both had dogs. She said she would have called for a backup bus if she had known there were two dogs scheduled on her bus. I told her she was wrong, and she said because she had worked in a hospital, she knew she was right. Of course, I pointed out that didn't have a thing to do with our current situation. Another time a driver refused to transport two of my friends coming from the same place at the same time going to the same destination. They weren't allowed to board the bus, and had to use an Uber to get to work. I don't know where the drivers and schedulers got this idea, but I plan to make much more of an issue if it were to happen again. Of course, schedulers know I have a dog, so they could be going by this policy while scheduling my rides without me knowing it.

2. Banning children from riding in a sedan.

For safety, RTS Access will not transport children in sedans if they are younger than 8 years and/or are physically smaller than recommended. The child must weigh at least 80 pounds and measure 4 feet, 9 inches in height.

I am well aware of the state regulations about children riding in automobiles since I have a child, two grandchildren, and many friends with children. I have read the state regulations in the RTS Access proposal. No seat belts are safe for people under 4.9 feet, but I was unable to find anything on NYS web site that said anything about 80 pounds. My grandson is 10 years old and is nowhere near 80 pounds. The regulation I read mentioned children weighing more than 40 pounds and children under 16 years old and weighing 100 pounds. As far as many of us, including myself, think this "Policy", not a law, is discriminatory against children and severely limits options for parents and other adults with a disability traveling with children.

If an adult is traveling with a child, it is their responsibility to know and abide by child safety seat laws. An adult should be allowed to transport children with them taking responsibility for providing legally mandated child restraint seats, and installing the seat without the driver's assistance... If the adult arrives at the sedan without mandated safety seats, the driver should refuse to transport them. The law states that it is the driver's responsibility to make sure passengers are safe, therefore, it is the right and responsibility of the driver to deny a ride to adult's that do not comply with child restraint laws in any vehicle the ride in whether it is a private vehicle or an RTS Access sedan.

***Bernice's Written Comments, Continued***

3. Scheduling hours

I have no problem with scheduling hours being 8:00 A.M. to 5:00 P.M. weekdays and 8:00 A.M. to 1:00 PM on weekends, except scheduling is also closed between 11:30 A.M. and 12:30 P.M. weekdays. I work 8:00 to 5:00, and my lunch hour is 11:30 to 12:30. Every contact center I know about staggers breaks and lunches so that there is continuous coverage for the hours they are open. I heard a rumor that the lunch hour was set the way it was, because the schedulers wanted to eat lunch together. If they want to socialize, I submit they should go out together after work or for breakfast before work. Anybody that schedules rides with RTS Access knows that the earlier you call the better the chance they will get the ride they want. I schedule rides to and from choir practice for every Wednesday evening. If I wait until the weekend, there isn't much chance I will get the ride I need to effectively participate. Many times, I am given a return ride home from choir practice at 7:30. That means I am only at practice for 1/3 of the time. The only way I can learn the music is by listening, so I have to turn such a ride down. The next best ride is often 9:30 and practice is over at 8:30. Church members aren't willing to leave me or anybody there by themselves for that amount of time. I'm not willing to tie up someone else's time like that either, so 9:30 doesn't work either.

4. Next issue, language negotiating a ride in proposal.

No definition of the word negotiating fits what scheduling is like. The schedulers tell you the available rides they have for you. You take it or leave it. There is no negotiating about it. Related to this is: Why can one scheduler almost always find you an acceptable ride and others almost never can find you an appropriate ride that works for you? I made one of the schedulers angry at me because I objected when she said I had to bring a cage on the bus for my guide dog. At first, I laughed, but then I said that it was a guide dog. She said it didn't matter. I didn't argue with her, so I just contacted Michelle her supervisor to have the scheduler educated. Almost every time I get her now, she gives me rides that meet the letter of the law, but doesn't work for my situation. For example; if I ask for 10:00 A.M., she gives me 9:00, and if I ask for a 12:00 noon return she gives me 1:00. Therefore, this meets the letter of the law saying that rides can't be scheduled more than an hour earlier or later than the requested time. This means I would spend four plus hours for an activity that may take 90 minutes. There is another scheduler that is always a pleasure to speak with, because she is pleasant and usually finds a workable ride for me. What's up with that?

5. Training for eligibility decision makers, especially for conditional status.

What kind of training do the eligibility determination staff receive, from where, and by whom? Can we see the curriculum? Do they cover all types of disabilities, and their variations and degree? What are their job qualifications?

6. Visitors only receiving 21 days a year.

I can think of many scenarios where a disabled person might come to the Rochester area and spend more than 21 days a year. What do you recommend for these people? Can someone be certified for para transit in more than one jurisdiction? Example; someone may live in Syracuse and come to Rochester to assist an elderly parent on weekends. Could that person be certified both in Syracuse and in Rochester?

7. Changes in fixed routes

I have to take exception to the language and the content in this section. When a fixed route is changed, of course it impacts the RTS Access service area. First 30 days isn't much of a warning that there is going to be no more service in a specific area, especially if it is where you live. Nobody can move within 30 days. A person with a disability is going to need to find another living situation that meets their income, physical needs, and be within the RTS Access service area. The second issues with the using of the language "alternative transportation". What alternative transportation? If the person is lucky enough to have a remaining CMZ option left in where the route is eliminated, what if they aren't able to make use of it? They are left stranded.

I used to be a member of Browncroft Community Church. Lifeline service was cut, so I spent months getting hit or miss rides to church services and other activities. It got to be so much of a struggle, I changed churches. There were no other transportation options. The only alternative option was a taxi, which I couldn't afford. Even medical appointments in that area were no longer available to me. My dentist is immediately across the street from the church. I don't qualify for reduced fares on Medical Motors, and I can't afford to pay the whole thing.

I resent the use of alternative transportation, because it sounds like all I have to do is choose from many options. There aren't any other options. My letter telling me about "Other Options" was worthless.

Bernice Bird  
End of Comments from Bernice Bird

## **Heather Bird**

Heather spoke at the Public Hearing on April 02, 2019. Her comments are about Sedan Policies and Scheduling Hours.

### **Heather's Verbal Comments from the Public Hearing Transcript**

"Right here. My name is Heather Bird. I am the President of the New York Association of Guide Dog Users. I'm also the President of the Rochester Chapter of the National Federation of the Blind."

"I'm not going to iterate all the things I think are good about the plan -- there are many -- because my time is limited. One thing I would say is it is absolutely reasonable to make the hours shorter for scheduling by phone, if and only if, the online scheduling is piloted first, is accessible and any bugs where it's not accessible are ironed out first. We would ask that you not change the hours of scheduling until and unless online scheduling has put in place and fully and correctly tested for accessibility first."

"I want to second what Bernice said. If there are going to be abbreviated hours, it will be even more important that there not be a break for trainings or whatever that may be. If you're a little confused about how to do that, I bet ABVI can help you there. They have a gigantic call center and they certainly coverage entirely in the hours when they're open. They stagger hours. It's a common practice."

"What was said about children, I second that. And we have a video that we're going to be brining to Jamie. I'm telling you that installing a car seat is very, very quick. On Uber or Lyft or a cab, when you have to, by law, install a car seat, it really does not take a lot of time. And we would be okay with wording in there that says: If we arrive and you do not have an adequate car seat for the child, you will not be transported with that child. And if that means that you're a late cancel, then you get a penalty, because as a parent, it's your job to have a car seat and install it."

"Additionally, we're asking that there be specific language that states that guide dogs and service dogs are allowed in all vehicles, including sedans, and language to protect RTS Access stating when and how dogs will be ejected from vehicles, including a window of time where, if the dog is misbehaving at pickup, the handler may go and place the dog in the house. If they wish to continue to take the trip, under the ADA you can exclude the dog, but not the handler. So that if the handler chooses to take the trip without the misbehaving or dangerous dog that has been ejected from the vehicle, we ask that you give them five minutes to return to the building, release their dog - excuse me, I need some water -- place the dog in a secure location and then return to the vehicle."



“We will submit additional comments from members of NFB prior to the deadline.”

End of Comments from Heather Bird

## **Carol Borsa**

Carol spoke at the Public Hearing on April 02, 2019. Her comments are about Service Change and Sustainability.

### **Carol’s Verbal Comments from the Public Hearing Transcript**

“Thank you. Good evening. My name is Carol Borsa and I'm the Vice President of Mission Services at Goodwill in the Finger Lakes. My comments are on behalf of our over 700 employees. Our organization has provided opportunities for clients or people in our communities with barriers to independence for decades. Many of us worked at our main campus in the South Wedge neighborhood or at our Goodwill stores throughout the located region. However, all of us live throughout the Greater Rochester Region and many of us rely on paratransit to get to work. Reliable and affordable transportation removes a barrier for access to good jobs and brings peace of mind to both employees and employers. As you can imagine, the uncertainty and maybe unsustainability of what happens next and how you're going to get to and from work every day is a big concern for my colleagues, as well as Goodwill and ABVI as the employer.”

“Moreover, paratransit provides individuals with disabilities access to medical appointments, grocery shopping and many other aspects of community life, as well as for many in our community with social disabilities or health and socialization in having not just a quality, but equity in the services that are available to all. The long-term sustainability of paratransit is necessary for people to have equal access and to participate fully in society. As an employer, it gives us the assurance that our skilled employees can get to work every day. We are counting on them to sew uniforms for the U.S. Military, prepare meals for our seniors and through phone calls at our call center and available to RTS and to prepare meals for seniors and to work at any one of our eleven Goodwill stores throughout the community. We appreciate the changes that have been made and the many meetings that you've had and listening. And please note that there's a vital importance that paratransit plays in the lives of my colleagues and the hundreds of people and other employers throughout the community. Thank you.”

End of Comments from Carol Borsa

## **Matthew Crowley**

Matthew submitted comments in writing during the comment period. His comments are about Fares.

### **Matthew's Written Comments from the Comment Period**

Attn: Counsel

I was informed of the following, RTS will have para transit services available in most of the areas in Brockport and Clarkson the cost for this service for some of the areas is proposed to go from \$2.00 per one way trip or \$4.00 per day to \$8.00 per trip or \$16.00 per day. I am not able to afford this. I do not make a lot of money. I have to get back and forth from my job daily and require the use of Lift Line. I also use this transportation for some appointment or if my schedule differs in anyway. Please reconsider this increase as I would not be able to afford this increase and would therefore be unable to get to my designated areas.

Best regard,  
Matthew Crowley  
End of Comments from Matthew Crowley

## **Scott Davis**

Scott spoke at the Public Hearing on April 02, 2019. His comments are about Fares, Accessibility of Technology, and Scheduling Hours.

### **Scott's Verbal Comments from the Public Hearing Transcript**

"Well, good evening or good afternoon, everyone. I want to talk about the paratransit. I am - I work over at ABVI and I am also a lay deacon in the Lutheran Church, Catholic primarily. There are a couple churches where the supplemental -- I don't know if there is something wrong with the microphone -- let's say that we need to make the rides more affordable for people. And also the thing with JAWS with the internet. Some of the websites JAWS will not permit you to get onto because the websites how they're created. I think they need to schedule in the scheduler's work, like, say: 8:00 a.m. to 10:00 p.m., seven days a week."

End of Comments from Scott Davis

## **Angelo Ercolamento**

Angelo submitted comments in writing during the comment period. His comments are about Fares, Sustainability, Advance Reservations, Scheduling Hours, and Service Span.

### **Angelo's Written Comments from the Comment Period**

In regards to the Mobility Zones and the suburban areas:

1. It's apparent that the sustainability of the (RTS Access Proposal) is nonexistent. Instead it seems to be written as a temporary solution to push the proposal through and to calm down the outcry from the people from the disability community that live in the unrequired Access Zones 1, 2 and 3.

With wording like The Required Area surrounds the fixed route service and is shown on the map as a large green "blob" shape. By federal requirements, we are required to provide complementary paratransit service in this area, and (The supplemental service areas may change if so authorized as a resolution from the Board of Commissioners).

I ask that you the commissioners, put in the final plan some wording to insure the sustainability to the service areas in Zones 1, 2 and 3.

2. Pricing should be more uniformed across the board, with the most anyone pays for a scheduled ride is \$4.0, and trips under 3 miles even if the trip starts and stops within the same zone is no more than \$2.0.
3. I ask that you don't change the 7 day scheduling window. In the proposed plan , riders riding on Thursday and Friday those riders that are working , going to school and Dr. appointments during regular business hours will be made to schedule their rides on a shorten weekend schedule, causing longer hold times and less efficient service.

I also ask that you reconsider the weekend service hours for the 3 zones, People's lives continue even on the weekends. We work, shop, visit family and go to events.

Sincerely

Angelo Ercolamento

End of Comments from Angelo Ercolamento

## **Shannon Fisher**

Shannon submitted comments in writing during the comment period. Her comments are about Fares.

### **Shannon's Written Comments from the Comment Period**

Dear member of counsel,

I have been informed that there will be a significant increase in cost for transportation for those of us that use RTS/Lift Line. This is very unfortunate and I urge you to reconsider as I do not make enough money to support the increase. I only earn SSI wages and I am unable hold a job due to my disabilities. I use this service to get back and forth from appointments that I need to attend. Please, I urge counsel to reconsider this increase and consider the people this is affecting.

Thank you for your time,  
Shannon Fisher

End of Comments from Shannon Fisher

## **Margaret Garrow**

Margaret spoke at the Public Hearing on April 02, 2019. Her comments are about Fares.

### *Margaret's Verbal Comments from the Public Hearing Transcript*

"I live in Greece and sometimes now I have to plan so that I do two or three trips a day, because I had tried to get everything done during the week because of the fares on the weekends is so much higher and I really can't afford them. So, basically, I'm only using Lift Line during the week now and trying to cram two or three rides into each day if I need to do stuff. The weekends I'm pretty much home, because I just don't go anywhere, because I can't afford to pay those fares. So. . ."

End of Comments from Margaret Garrow

## **Lorraine Garver**

Lorraine submitted comments in writing during the comment period. Her comments are about Fares and Service Change.

### **Lorraine's Written Comments from the Comment Period**

Dear Sir or Madam:

This letter is regarding my 34 year old son, Andrew Garver, who is developmentally disabled. Currently he has a subscription RTS Access ride which he uses 4 days a week to go from home to his job at Eastview Mall and back. We live off the 47 Monroe bus route that has weekday service to Pittsford Mendon High School. The cost for his 2 rides per day is \$4.

With the proposed RTS reorganization our home will be in the Level 3 supplemental service area. Based on the Proposed Paratransit Plan my son will not be able to have a subscription ride and the plan also states "The supplemental service in Level 3 will be provided only if space is available after accommodating requests for service within the Required Area, Level 1, and Level 2. RTS Access will expect customers to accept the possibility of unavailable space when attempting to reserve a trip to an origin or destination in Level 3, and pay the supplemental rate upon boarding the bus. Reservations can be made up to 1 day in advance only and trips are not guaranteed." Based on this plan the cost of his job round trip will be \$16 which is 37% of his gross daily wages. How can a disabled person hold a community-based competitive job if they do not have affordable and reliable transportation?

In 2014 Governor Andrew Cuomo signed an executive order which states that "New York prioritizes competitive integrated employment as the preferred outcome for working age New Yorkers with disabilities".

Sincerely,  
Lorraine Garver  
End of Comments from Lorraine Garver

### **Anthony Griggs**

Anthony and his attendant spoke at the Public Hearing on April 02, 2019. His comments are about Fares, Service Area, and the 5-Minute Window.

#### *Anthony's Verbal Comments from the Public Hearing Transcript*

"He's right here. My name is Anthony Griggs. I'm about to use Access for my day program, for LAI. I like that part. And about sometimes on -- around the weekends, by me living on 550 Calkins Road, we really try getting a ride to church. That's not fair they don't give me a ride on Saturday to Sunday. But about the fare, they outrageous. It needs to be \$2.00 both ways, not \$16.00. And by me worried about some of my friends who live in Penfield and Brockport, they might be losing their ride. Thank you."

#### *Verbal Comments Provided by Anthony's Representative from the Public Hearing Transcript*

"The one thing that we just wanted to add in is, I don't know how many people here, or if some of the people here have ever been in a group home setting, but I just wanted add onto -- we just wanted to add onto -- the five-minute wait period issue.

Especially in group homes and, you know, even people who live by themselves, that it is hard and it is difficult sometimes for people to get around and more difficult some days than others. So especially in a group home where we have three individuals who go on the same bus who use Lift Line. And some mornings, it's hectic.

There are six individuals in our house, sometimes only two staff helping to get them ready. And even, sometimes when they can get themselves ready, some mornings are rough. And so that's an issue sometimes in our house and, I assume, in other people's house sometimes too. And I think that's one thing that maybe you guys can try to be a little more lenient with. And, yes, I know there are concerns about different programs, even within Lifetime Assistance, the organization that we are in, but we have some programs that are out in Brockport. We have people who take night classes out in Brockport, stuff like that. So it definitely is a fear in our household right now."

End of Comments from Anthony Griggs

### **Ernest Haywood**

Ernest spoke at the Public Hearing on April 02, 2019. His comments are about Fares.

#### **Ernest's Verbal Comments from the Public Hearing Transcript**

"Good evening. My name is Ernie Haywood. I'm the Vice President of Lifetime Assistance. We represent over 1,800 individuals that we support to have inclusionary and independent lives in the community."

"I want to first of all thank Mr. Carpenter, Maggie, Jamie, Miguel and all the group at RTS for repeatedly listening to us and taking our feedback and changing the plan to be more supportive of people with disabilities. There's many positive changes and I'm very excited about some of the enhancements for people that we support."

"There does remain one major issue for us, the people we support I should say, and the literature provided by Reimagine RTS. One of the goals is to -- while it may be different -- RTS wants all current customers to be able to access the new system; and the second goal that I want to reference it says "reasonable rates consistent with what we do today." The supplemental rates in, specifically, the Brockport area, we have twelve individuals that currently pay \$2.00 for a one-way trip or \$4.00 a day and they will now pay \$16.00 per trip -- per day or \$8.00 per one-way trip. This is simply not affordable. So anything that can be done, look at the rates to make it more affordable for people. That will be greatly appreciated."

"Again, thank you for your efforts on behalf of people with disabilities."

End of Comments from Ernest Haywood

## **Lois Hines**

Lois submitted comments in writing during the comment period. Her comments are about Fares and Service Span.

### **Lois's Written Comments from the Comment Period**

Attention RTS-Access,

I'm sincerely expressing two points referring to the changes for three areas on the outside (orange and grey) areas of the proposed para-transit plan. My first concern is the \$5 fare height. Most of these riders who live in areas may not be able to afford paying \$5 per ride or \$30 per week. But the folks need to go to doctor appointments especially people with major and chronic health issues. My Second concern covering the seven o'clock cutoff for those who work later hours and need to shop at night. This will be an inconvenience on people in this area.

Please reconsider this dilemma.  
Thank you for your understanding.  
End of Comments from Lois Hines

## **Norma Hines**

Norma submitted comments in writing during the comment period. Her comments are about Fares and Service Span.

### **Norma's Written Comments from the Comment Period**

Attention RTS-Access,

I'm sincerely expressing two points referring to the changes for three areas on the outside (orange and grey) areas of the proposed para-transit plan. My first concern is the \$5 fare height. Most of these riders who live in areas may not be able to afford paying \$5 per ride or \$30 per week. But the folks need to go to doctor appointments especially people with major and chronic health issues. My Second concern covering the seven o'clock cutoff for those who work later hours and need to shop at night. This will be an inconvenience on people in this area.

Please reconsider this dilemma.  
Thank you for your understanding.  
End of Comments from Norma Hines

## **Gidget Hopf**

Gidget submitted comments in writing during the comment period. Her comments are about Sustainability.

### **Gidget's Written Comments from the Comment Period**

Like many others in our community, we at Goodwill of the Finger Lakes and the Association for the Blind and Visually Impaired believe in a robust public transportation system and stand against any efforts that would jeopardize access for our community members. We are committed to working with RTS in its efforts to maximize transportation opportunities as many of the people we employ or serve are dependent upon RTS daily.

Reliable and affordable transportation removes a major barrier for access to good jobs and brings peace of mind to both employees and employers. Moreover, para-transit provides individuals with disabilities access to employment, education, medical appointments, grocery shopping and many other aspects of community life. The long term sustainability of para-transit is necessary for people to have equal access to fully participate and contribute to our society. And, as an employer it gives us the assurance that our employees will get to work every day.

End of Comments from Gidget Hopf

## **Ericka Jones**

Ericka spoke at the Public Hearing on April 02, 2019. Her comments are about Fares and Service Area.

### **Ericka's Verbal Comments from the Public Hearing Transcript**

"My concern is mainly just for the suburbs, Henrietta and Webster, just being able to get to appointments in the City, back and forth. If you're in a Supplemental Area the mention of cost has already been mentioned, but my main concern is just West Henrietta/Rush area, Lima, being able to get to appointments in the City, doctor's appointments. That's it."

End of Comments from Ericka Jones

## **Rene Latorre**

Rene spoke at the Public Hearing on April 02, 2019. She also submitted written comments through the online [Contact-Us](#) form. Her comments are about Fares, Service Span, Service Change, Sustainability, and Service Infractions.



***Rene's Verbal Comments from the Public Hearing Transcript***

"Good evening. Rene Latorre, Director of Advocacy and Consumer Affairs at ABVI and the Goodwill of the Finger Lakes. We have been noticing the plan evolving. We just want to say that we're hopeful that is a direct result of our input that we've been giving through all these mobility sessions and we are looking forward to continued conversations."

"We do have a lot of concerns still. Our main primary one you hear repeatedly is the sustainability of the community mobility zones. We're very concerned what's happening with Level 2 and Level 3. They're not getting a whole lot of service, especially Level 3. And the fear or the concern is that in those mobility zones, if the hubs are not utilized by the general public, greatly utilized, I'm worried and concerned over time that those services might be pulled back and might be seen as not necessary, not utilized and then would that affect Access? That is a very big concern of ours."

"Community mobility zones. 7:00 p.m., I do have to say something about that. You'll hear that. I think that is unreasonable to have 7:00 p.m. on weekdays. I think all the community mobility zones should have the same hours. I've noticed that Brockport has, like, weekdays until 10:00 p.m. I'm not sure why that is, Lexington and Brockport. And then the other mobility zones don't have weekdays at night, but they have weekends. So I think ten o'clock at night for all the community mobility zones. I think the ten o'clock to all the community mobility zones and from Monday until Sunday.

"Another concern we have are the fares. We feel they are unreasonable. Let's put it this way: We feel like they should be more equitable. We did discuss higher -- raising fares would be better than have no transportation at all during focus groups, but I don't think I saw it that way. I would rather see it more equitable across the board. There are raised rates for the fixed routes and everybody should be sharing the responsibilities, not just hitting the people who need it the most the hardest with the highest fares. And that same-day is really unreasonable. Some people can afford it, yes. A lot of people can't, especially on fixed incomes. I do want us -- I want you to consider that and take that into consideration. Thank you."

**Rene's Written Comments from the Comment Period**

Dear General Council:

I am writing to submit my formal written comments regarding the RTS paratransit proposed plan. My comments are on behalf of the Association for the Blind and Visually Impaired and Goodwill of the Finger Lakes and the thousands of individuals we serve every year.

There are still many concerns regarding this plan that we respectfully request the Commissioners to consider prior to the passage of this plan.

#### Sustainability of the Community Mobility Zones

First, the plan is based upon the premise that the Reimagine proposed fixed route service area has already been implemented. It also assumes that these two plans—Reimagine and the paratransit proposed plan are separate from each other and although R-GRTA has treated these two entities as two different companies with separate meetings and public hearings, one cannot separate them as the service area for the RTS paratransit is directly determined by the RTS fixed routes in accordance with the ADA. It should be understood that there are still concerns about the elimination of existing fixed routes to the suburban areas.

Although your plan is proposing mobility options such as route deviation and flex service in these areas, these areas will be serviced by commuters and the plan clearly states that RTS is not required to provide paratransit service in these areas. It is for this reason, we have significant concerns that without ADA protections, the sustainability of the paratransit service in Level 2 and Level 3 of the Community Mobility Zones will be under threat and possibly eliminated.

It should also be noted that not only are we concerned about the paratransit service area, but we are also concerned about the areas serviced by fixed route as proposed in Reimagine. There are many people living and working in these areas that rely on public transportation that will no longer have the transportation as they now know it. It will be a longer ride with an additional transfer at the hub requiring the use of two to three buses to get to your final destination. The trip will then become longer, more expensive and more inconvenient than what exists today. There is also much concern among the general public regarding the safety of these hubs and transfer points as they are being slated to be built in vacant areas/parking lots and plazas. This is a valid concern for all individuals and it's important to note that many people with disabilities do ride the fixed route buses.

I attended many Community Mobility Zone Information meetings and heard messages inviting us to attend our own meetings in which paratransit would be addressed. I feel strongly that the survey and data collection, the community mobility information sessions and the public hearings should have been combined integrated meetings and not separate ones segregating the disability community from the general population.

***Rene's Written Comments, Continued***

The RTS Access riders are hearing that everyone who has a ride now will still have a ride, but one has to wonder for how long. We have concerns that if the commuters are not heavily utilized, the service may be determined to be obsolete and the paratransit service could disappear with it. Again, there will be no ADA protections in these areas since there will no longer be fixed route service. It is our fear that the plan is to reduce the service area leaving just the required green and possibly some of the blue (Level 1) areas.

**Fare Structure**

The proposed fare structure for Level 2 and Level 3 of the paratransit (orange and grey) is unfairly increased at a 200%-300% increment. You are increasing the fare to those who are most vulnerable and most in need of your service while your other riders enjoy same fares or very little increase. This increase needs to be equitable across the board with all riders sharing the cost increase burden and not having it fall on the shoulders of just the disability community. For people on fixed incomes, these fare hikes will be unaffordable and same day service will be completely out of the realm of possibility.

We have concerns for the dialysis community who rely on RTS and paratransit to get to their non-optional, lifesaving medical treatments. We also have concerns for individuals who rely on this transportation to get to work every day and who do not have other affordable transportation options. Considering a 70% unemployment rate among individuals with disabilities, this reduced transportation and expensive fares will only further decrease employment opportunities for this specific population.

We feel strongly that if the fare increases need to be present due to budget restraints, then they should be evenly distributed across all riders and across both transportation systems—the fixed route and the paratransit.

Also, with the significant state budget increase for R-GRTA, it is our hope that the increased funding will go towards improvements of the paratransit system in addition to the fixed route system.

**Hours of Service**

For those relying on paratransit and living in Level 2 and Level 3, there is a severe service hour limitation. It is being proposed to have no service on weekends, holidays or after 7:00 PM. We are very concerned that this is so limiting for individuals who need to work different shifts or later in the evening, get to their children's school activities or be able to attend community events. This is unfair to individuals in the disability community who do not have transportation options and will not be able to afford ridesharing options such as Uber or Lyft on any kind of regular basis. The paratransit service hours of operation should be consistent throughout all areas including the CMZ's.

### Late Cancellations/No Show Policy

The current plan proposes to reduce the number of allowable cancellations for permanent riders from 10% to only 5%. As much as we understand and agree that we want permanent riders with subscriptions to use their subscriptions and discourage late cancellations, it is important to consider that unexpected things do occur such as illness, children being sick, schools being closed due to weather conditions, etc. We understand the plan proposes a policy in which cancellations or no shows that are a result of circumstances beyond one's control, however, we ask this be a consistent policy honored by all RTS Access staff. Some people have reported that they were asked for proof of the circumstances such as a doctor's note, hospital record, etc. while others have not experienced this kind of questioning. We request that the No Show/Late Cancellation policy include reasonable consideration of circumstances beyond one's control and remain at a minimum allowable level of 10% of all rides.

In summary, our primary concerns about this proposed Reimagine/paratransit plan are the service area sustainability, the high fare structure for some, the hours of service for those living in the CMZ's and the restrictive 5% cancellation policy of all rides.

We share the belief of your mission that all individuals in our community should have safe, reliable and convenient transportation that people can build their lives around. This community has done just that but looking ahead, people need a transportation system they can count on. People cannot continue to sell their homes, uproot their children from their schools, and relocate every time RTS decides to cut another route or service area.

Thank you for hearing our concerns.

Rene Latorre

Director of Advocacy and Consumer Affairs

Association for the Blind and Visually Impaired

End of Comments from Rene Latorre

## **Samuel Lee**

Sam spoke at the Public Hearing on April 02, 2019. He is Shelly Perrin's representative. His comments are about the 5-Minute Window.

### **Sam's Verbal Comments from the Public Hearing Transcript**

"I'm Sam. I'm Shelly's speaker. I agree on her about the five-minute window. I think they should pretty much extend it a little bit, because of the fact that a lot of people can't get downstairs on time or sometimes the elevator might be closed. I think it would be more reliable if they could extend it a little bit, because you never know if it's, like, if someone is trying to get ready and whatnot, and they can't rush downstairs, like, fasten up to get downstairs. Then, all of a sudden, paratransit leaves. Then it's, like, they can be late for an appointment or late for a job. And, I mean, I think they should extend it. Thank you."

End of Comments from Samuel Lee

## **Roger Livingston**

Roger spoke at the Public Hearing on April 02, 2019. His comments are about Fares and Service Change.

### **Roger's Verbal Comments from the Public Hearing Transcript**

"Hi. My name is Roger Livingston and I would also like to quickly address the fare system. Right now the only time I use Access buses are return trips home from dialysis and I live right next to the Park & Ride in Perinton."

"It is proposed they are going to close it. So I only have the Access bus when they pick me up, which is only less than half a mile across the street; but the fare, apparently, is going to jump from \$1.50 to \$8.00. And now the buses won't be running.

"When I was able to take the bus downtown, that would be \$1.50, but now it's going to be \$8.00, apparently, to get downtown. I don't know if I'll be able to do that. I just think the fare, especially on Access, because now it's going to be -- if I go to twelve treatments in a month, instead of paying \$18.00, I'll pay ninety-six. And a lot of people, as other people just mentioned, a lot of people here are disabled or living on disability income. So there is not a lot of extra money to -- it's a big jump from \$1.50 to \$8.00. So I would just like that to be considered. Plus, I'm going to have a lot more doctor's appointments coming up, because I'm going to be getting a transplant. So thank you very much."

End of Comments from Roger Livingston

## **Paula Mathews**

Paula spoke at the Public Hearing on April 02, 2019. Her comments are about Fares and Service Span.

### **Paula's Verbal Comments from the Public Hearing Transcript**

"Everybody can hear me in the back of the room? I talk really loud. If I have added this right, if I want to go to Brockport, for an evening class, that's the orange. So that's \$8.00 out, \$8.00 back and then the sixteen and then, if I have to do same day, that's another six, another six for each trip. So that's twelve. So that just put me up for \$30.00 to get to and from a class. I'm on a limited income. It doesn't change. It's fixed. It's below, below poverty. So feasibility wise, that doesn't work, the fare schedule. And limiting to 7:00 p.m., that doesn't work. Like somebody else said, if you're working and you have to go grocery shopping or you need to run an errand or if you have a service animal and you've got to get it to the vet and what have you, you can't do that. Now, no holiday schedule? People have families that live in Webster or out that way where the bus used to go and can't do that. I've heard of people who have moved out of their homes from Webster into the City just so they will be able to take paratransit. So I'm not in favor of Reimagine RTS. I'm not in favor of this paratransit. I think it's very discriminatory to low income, disabled people."

End of Comments from Paula Mathews

## **Karen Moses**

Karen submitted comments in writing during the comment period. Her comments are about Fares, Service Span, and Service Area.

### **Karen's Written Comments from the Comment Period**

Please reassess: 1. loss of paratransit service hours & geographic areas currently being served; 2. the percentage of fare increase for paratransit riders, For citizens who live with the combined circumstance of vision loss and fixed income, using the service is vital to self-care and community participation. Lack of paratransit service, or fares of \$3, \$5 & \$8 creates an unbearable burden, translating to direct, negative impact on well-being, due to lack of access to securing supplies/services to meet basic human needs; and being alive in community life.

I work with people about resolving transportation issues when driving is not an option, and I see how lives are literally saved, when RTS paratransit service is available and financially accessible to them. Please consider this impact when making decisions about their future. Regarding money - please consider a nominal fare increase for ALL riders, instead of significant increases to paratransit riders only, to achieve financial viability.

## **Deb Muratore**

Deb spoke at the Public Hearing on April 02, 2019. She also submitted written comments through the online [Contact-Us](#) form. Her comments are about Fares, Service Span, Service Change, and Fleet Changes.

### **Deb's Verbal Comments from the Public Hearing Transcript**

"Hi. I'm actually reading this for a friend that was not able to be here. Some of my concerns are: One, if they have \$20.00 passes available, will we have to add that to the pass to come up with the \$5.00 fare, which some of us have to incur? Number 2, limiting us to 5:00 a.m. to 7:00 p.m. time frame will make it difficult for us to work and then do our errands, especially someone like me that doesn't have coverage on weekends. Number 3, it has never been mentioned what the Greece paratransit riders will do if they need a ride on the weekend and/or after seven. The hub in Greece has never been identified to us. Thank you."

### **Deb's Written Comments from the Comment Period**

Thanks for your time & effort put into this extensive project. I've been to numerous meetings & have seen the changes.

I've heard there will be some electric buses commissioned in over the next few years. What will happen to the old & double long buses since there will be more frequent routes? Will more Paratransit buses be added?

As our population ages & more people with disabilities are using your services it is important that their access minimally remain the same & at best improve. On line scheduling & canceling of rides will be a vast improvement over a sometimes long phone wait. Drivers that take passengers on a more direct route instead of back tracking is vital. People need to be able to sustain their independence.

Any change takes an adjustment period so thanks in advance for any issues that come up in the future that will be dealt with in a mutually acceptable way.

What is the review period after the proposed plan has been implemented?

End of Comments from Deb Muratore

## **Shelly Perrin**

Shelly spoke at the Public Hearing on April 02, 2019 with the assistance of her representative Samuel Lee. Her comments are about the 5-Minute Window.

### **Shelly's Verbal Comments from the Public Hearing Transcript**

"Shelly says that paratransit, with the five-minute window, she thinks it's not right for it to be five minutes. They should extend it. She says they should give people time to get downstairs. It's not easy. And her arm's not working right. It takes her a while to get her hand on the bottom of her chair. Thank you."

End of Comments from Shelly Perrin

## **Adam Pehur**

Adam spoke at the Public Hearing on April 02, 2019. His comments are about Service Change, Sustainability, and Fares.

### **Adam's Verbal Comments from the Public Hearing Transcript**

"Good evening, everyone. My name is Adam Pehur. I just have a couple of concerns. To speak on the behalf of some coworkers, as well as people I work with. The one concern I have is the people that will lose the reliable transportation along 31 and 250. Many of those people use that for work, as well as very important appointments. I'm also concerned about the future changes, what the protocol is. If the community mobility zone don't work out, what's the protocol to RTS to eliminate those or change those. I also have a concern with riding within the community zone. I understand the raising of fares from those zones, but within -- travelling within those zones, if you're still going under -- let's say you're going two miles, it's still five dollars each way. But I also want to say: Thank you for the adjustments you guys are making, but I know you guys can make this better."

End of Comments from Adam Pehur



## **Janie Pehur**

Janie submitted comments in writing during the comment period. Her comments are about Fares, Service Span, and Eligibility.

### **Janie's Written Comments from the Comment Period**

I am an Orientation & Mobility Specialist for Boces & worked for 5+ yrs. at ABVI. I urge RTS to honor the service currently in place especially where it relates to the homes of riders who are employed because of their access to affordable independent transportation through RTS Access. Many people will lose their jobs due to this plan & with that their independence, sense of self-worth, dignity & ability to provide for themselves & or a family. Many persons with disabilities are at a disadvantage when it comes to employment, wages and transportation. Many have persevered and are using RTS Access to and from work each day and are an inspiration to us all. Many are finding that their homes are no longer in the new service area or the fare too high to break even. Please 'grandfather' those riders with demonstrated employment and good ridership if you can legally. If not, please honor the eligibility status of all rider ID's through expiration dates as it can take years to find new homes and jobs.

End of Comments from Janie Pehur

## **Maddy Pope**

Maddy submitted comments in writing during the comment period. Her comments are about Fares, Service Span, and Sustainability.

### **Maddy's Written Comments from the Comment Period**

Members of the General Council:

I am writing to submit my formal comments regarding the RTS Access proposed plan. I have concerns pertaining to some of the changes as a result of the Reimagine RTS project and the paratransit proposed plan.

I recently became familiar with RTS Access and its imperative role in the lives of many individuals with disabilities who cannot provide their own transportation. At my internship at the Association for the Blind and Visually Impaired, I have learned that RTS Access users strongly depend on accessible, affordable transportation to complete every day activities that a person with his or her own vehicle has the ability to do effortlessly.

Pertaining to your new proposed hours of service, there is a severe service hour limitation, especially for those who are living in Levels 2 and 3. The proposal to have no service on weekends, holidays or any time after 7:00 PM is concerning to me. This will cause individuals in our community to become so limited, as they are required to work different shifts or later in the evening, get to their children's school activities, attend their doctor's appointments or have the ability to attend community events. This is unfair to individuals in the disability community who do not have transportation options and will not be able to afford other options such as Uber or Lyft on a regular basis. The paratransit service hours of operation should be consistent throughout all areas including the Community Mobility Zones.

Also, the service areas draw a concern, especially for the community mobility zones and the supplemental services. Since these areas of service are not required by the ADA, it is worrisome to me that they will eventually disappear altogether. To use your blanket and bed analogy, my concern is that you will not want to stretch out the blanket to cover more space when you can simply put the blanket where it is required to go on the bed effortlessly. I hope that you will consider to make these areas more of a guarantee, as people are counting on transportation regardless of where they live in our community, and are hoping they will not be left out.

Lastly, there is a hugely unfair increase in the prices. As an example, someone who used to pay \$2 one way now would be required to pay \$5 one way. That is \$30 more per week. Individuals who use RTS Access are especially dependent on your service, and they cannot afford to spend \$50 a week on transportation. This is especially unfair, because your other riders will have the same prices or a very little increase. This increase needs to be equitable across the board with all riders sharing the cost increase burden and not having it fall on the shoulders of just the disability community. For people on fixed incomes, these increases will be unaffordable and many of your customers riding RTS Access will no longer have the ability to take your transportation. This reduces transportation accessibility and will then further decrease employment opportunities for this community. If the prices are required to be raised, then they should be evenly distributed across all riders and across both transportation systems; both the fixed route and the paratransit. Also, with the significant state budget increase for R-GRTA, it is our hope that the increased funding will go towards improvements of the paratransit system in addition to the fixed route system, so that RTS Access can continue to be "available on the same basis as that provided to people using fixed route systems".

I urge you to please consider the issues outlined above. The changes for both the fixed route and paratransit service are far reaching and will negatively impact many in our community. While transportation is convenient for some, please consider that for many individuals, accessible transportation is a necessity to get to work, to go grocery shopping, to get children to school events, to get to non-emergency medical appointments, and to be able to participate fully in society. Safe, accessible, and affordable transportation should be available to all individuals, not just those without disabilities.

Thank you for your consideration.

Sincerely,  
Maddy Pope  
End of Comments from Maddy Pope

### **Teresa Rand**

Teresa spoke at the Public Hearing on April 02, 2019. Her comments are about Fares, Service Span, Service Area, 5-Minute Window, and Hold Times.

#### **Teresa's Verbal Comments from the Public Hearing Transcript**

"I'm over here. Hello. My name is Teresa Rand. My concerns are I go to Charlotte every year to see the concerts. I do not want that cut out. And concerts go to, like, nine o'clock. So I do not want that to be shorten, because the concerts are just starting at seven o'clock. And I agree with Shelly. I think the time they wait for us should be a little longer, because we have elevators in our building. And, also, the wait time for scheduling have been getting a little longer. Sometimes they're okay, but I've been going over 20 lately. And I think the rides are getting a little too expensive."

End of Comments from Teresa Rand

## **Marty Reneers**

Marty submitted comments in writing during the comment period. His comments are about Service Change.

### **Marty's Written Comments from the Comment Period**

Dear R-GRTA Officer:

I am writing to the R-GRTA Board advocating for individuals with intellectual and developmental disabilities and the staff that support them at Lifetime Assistance Inc. (LAI) in the Town of Chili. For many years, the Route 8 bus has "deviated" twice daily from Chili Ave. down Marshall Rd. to our facility at 425 Paul Rd. , allowing both individuals with intellectual and developmental disabilities and the staff that support them to utilize the Route 8 bus. Staff that work or attend classes at our training center at 465 Paul Rd also utilize this service. Under the proposed "Reimagine" plan starting in 2020, this deviation would be eliminated, negatively impacting those people that depend on that as a means of transportation.

I would respectfully ask you to consider the following points and the impact that it would have on the disabled community prior to a final decision to eliminate the Route 8 Marshall Rd deviation:

Since the Route 8 bus has been in operation, Jet View Drive has been opened as a through street from Chili Ave. to Paul Rd. If the Marshall Rd. deviation were to be diverted to Jet View Drive/Paul Rd/Marshall Rd and increased in frequency from twice daily to 4 runs in the morning and 4 runs in the afternoon, that bus route would now be available to thousands of employees at 29 companies including Wegman's complex, U. S. Army Reserve Center, Harris Seeds and Lifetime Assistance Inc. just to name a few. The number of companies on that route continues to grow since there is open space in adjoining industrial parks allowing for future expansion. A letter from myself to Mr. Bill Carpenter on June 26th, 2018 outlined this proposed plan but was not received favorably.

Another option to replacing the Marshall Rd deviation rather than eliminate it would be to continue the Route 8 bus as it currently heads West out of the city on Chili Ave. to a loop at Old Scottsville Rd/Rte. 252/Norfolk Dr. and continues its return to the city East down Chili Ave. Replace the return route entirely on Chili Ave. to Paul Rd/Jet View/Chili Ave. This option would eliminate the need for a deviation and continue to serve all current customers on Chili Ave. and still increase ridership along Paul Rd. and Jetview Dr.

With the current unemployment rate being extremely low, it makes it difficult to recruit employees to our industry. By eliminating the Route 8 deviation it is even more difficult to recruit and train staff for employment at Lifetime Assistance Inc. since both our Paul Rd. locations will be less accessible.

In a March 22, 2019 letter to service providers such as LAI from the Department of Health and Human Services and the Centers for Medicare and Medicaid Services (CMS), we are reminded that "Promoting community integration for older adults and people with disabilities remains a high priority for CMS". This letter is very specific in its language. Providers of CMS services are to be focused on "Expanding strategies for increasing beneficiary access to transportation, including through existing public transportation". Transportation training of individuals in our programs has been and continues to be a focus as they move towards a level of greater independence in the community. Eliminating the Route 8 diversion minimizes the incentive and benefit of working towards public transportation proficiency.

I trust that you will take into account the above referenced examples that justify the continuation or even expansion of the Route 8 deviation. For many of the individuals that we employ at LAI or receive our services, public transportation is their only opportunity to be fully independent in the community. As specified in the letter from CMS, the federal government recognizes the requirement for accessible public transportation for individuals with disabilities to "facilitate optimal community engagement". Service to 425 Paul Rd is paramount to fulfilling that requirement.

Thank you for your consideration of the above proposal as R-GRTA plans for the future and determines its level of supports for people with disabilities and others in the community.

Regards,  
Marty Reeners  
Director of Vocational Services  
Lifetime Assistance Inc.  
End of Comments from Marty Reeners

## **Marilyn Rizzo-Ferris**

Marilyn submitted comments in writing during the comment period. Her comments are about Fares, Service Span, and Sustainability.

### **Marilyn's Written Comments from the Comment Period**

It is my hope that this proposal will stand as is and not change in the future. I am thankful that RTS is working with Paratransit Customers to assist in their travel needs. Though this does seem to be a temporary plan. Zones 1, 2, 3 must be sustainable. Price increases need to take into account the miles to get to and from. It does not seem right that people who have a mile or two are required to pay the \$5 as others who travel further. Weekend travel needs to take into account that people's lives continue on the weekends. Though many do not work weekends they still are required to get to appointments and shopping. I thank you for any consideration you can give to my concerns.

End of Comments from Marilyn Rizzo-Ferris

## **Marjorie Rose**

Marjorie submitted comments in writing during the comment period. Her comments are about Fares and Service Change.

### **Marjorie's Written Comments from the Comment Period**

Members of the General Council:

My name is Marjorie Rose. I am writing to submit my formal comments regarding the RTS Access proposed plan. I have been a customer/rider of paratransit for 28 years and have concerns pertaining to some of the changes as a result of the Reimagine RTS project and the paratransit proposed plan.

My main concern are the changes to the service area for paratransit service. As of now the changes to the service area will be forcing me to move because I use RTS Access to and from work Monday through Friday. I will have supplemental service, but that coverage is not reliable for work. Not only is not reliable, but not affordable for me to take to work Monday through Friday. I also use the service to get to medical appointments, grocery store, church, and among other places.

As an individual who is legally blind that lives alone, I feel comfortable and safe where I am living. Since I live by myself I need this transportation and support to get around. I have a good support system in the area, but would lose that, when I'm forced to find another place to live. My apartment is affordable and forcing me to move would be a financial burden. I would just like for you to imagine yourself in my shoes, as an individual who is legally blind, that lives alone, and on a limited budget, how it feels to have to pack up and move to an unfamiliar area.

I urge you to please consider the issues outlined above. The changes for both the fixed route and paratransit service are far reaching and will negatively impact many in our community. While transportation is convenient for some, please consider that for many of us, accessible transportation is a necessity to get to work, grocery shopping, getting our children to school events and to be able to participate fully in society. Safe, accessible and affordable transportation should be available to all- not just some!

Thank you for your consideration.

Sincerely,  
Marjorie Rose  
End of Comments from Marjorie Rose

### **Pam Taggart**

Pam spoke at the Public Hearing on April 02, 2019. Her comments are about Eligibility.

#### **Pam's Verbal Comments from the Public Hearing Transcript**

"Hello. I'm Pam Taggart. I want to say something about the Lift Line bus service. My sister and I, we both have cerebral palsy and Pat has arthritis and it's getting worse now and me with heart failure and since we're getting older now -- we're fifty-seven -- we should be able to get on the bus all year round. So when you guys get the applications -- they're going to be all year round, right? Because, if they're not, I'm going to have to go to the top. And I will do it. And I will take you guys to court. Thank you."

End of Comments from Pam Taggart

## **Lindsay Tersmette**

Lindsay submitted comments in writing during the comment period. Her comments are about Fares, Service Span, Service Change, and Sustainability.

### **Lindsay's Written Comments from the Comment Period**

Members of the General Council:

My name is Lindsay Tersmette. I am writing to submit my formal comments regarding the RTS Access proposed plan. I have been a previous customer/rider of paratransit and currently work professionally with many individuals who utilize the service. I have significant concerns pertaining to changes as a result of the Reimagine RTS project and the paratransit proposed plan.

Transportation is a necessity for all individuals and families to participate in community events, maintain employment and attend medical appointments. For many, the luxuries of a car, are taken for granted. For individuals without the ability to drive, they rely on RTS Access to navigate to these obligations. I work with several individuals who in the new proposed plan, will lose access to transportation. This impact will negatively influence their health and the community. The proposed plan would eliminate or limit transportation access to individuals with disabilities to outlying areas, including Fairport, Greece, Brockport, Gates, Henrietta and other areas. We live in a world that no longer operates Monday-Friday 9-5. Many individuals work late hours or weekend shifts and will be unable to travel to work given the proposed plan. In addition, if these areas are not required with the new community mobility zones, these areas are not guaranteed long term. If these areas are not maintain, this will have a negative impact on the disability community as well as the community as a whole.

The current fare structure of RTS Access, though confusing, is affordable and sustainable for the population it serves. For an individual working 5 days a week and living outside the city of Rochester, the proposed plan will increase their transportation costs by \$30 per week or a total of \$1560 a year. For many individuals, this fare is not within their budgetary means. For many individuals who have disabilities, they earn minimum wage are underemployed. An increase of \$30 per week is more than a 100% increase in fares. This amount is not acceptable for many of these individuals to maintain their employment, which in turn would greatly impact our community in negative ways.



I urge you to please consider the issues outlined above. The changes for both the fixed route and paratransit service are far reaching and will negatively impact many in our community. While transportation is convenient for some, please consider that for many, accessible transportation is a necessity to get to work, grocery shopping, medical appointments, getting children to school events and to be able to participate fully in society. Safe, accessible and affordable transportation should be available to all- not just some!

Thank you for your consideration.  
Sincerely,  
Lindsay Tersmette  
End of Comments from Lindsay Tersmette

### **Charles Tremblay**

Charles submitted comments in writing during the comment period. His comments are about Fares.

#### **Charles' Written Comments from the Comment Period**

Dear member of counsel,

I have been informed that there will be a significant increase in cost for transportation. I have utilized this service for work for years. I can hardly afford the current prices some weeks. I fear that with increases in the costs, I will not be able to get to my job any longer. Please reconsider the cost increase as this will affect many people in the community with disabilities. I have many friends in the area that have expressed the same concerns.

Thank you for reconsidering the cost increase,  
Charles Tremblay  
End of Comments from Charles Tremblay

### **Justin Young**

Justin spoke at the Public Hearing on April 02, 2019. Her comments are about Fares, Service Span, Advance Reservations, and Scheduling Hours.

#### **Justin's Verbal Comments from the Public Hearing Transcript**

"Hi. So there's good things and bad things in this plan from my perspective. The good things are when Jamie was talking about the no show/late cancellation policy; how it's been modified; how it's not -- you know, you couldn't basically appeal those. They didn't have that in the past or it wasn't as easy as it's going to be."

“The things I don't care for in this plan are the multiple fee structures. You're jumping from \$2.00 to \$5.00 to \$8.00. Then on top of that you have the \$6.00 same-day service. It sounds too complicated to me and also the ending the rides at 7:00 p.m., for some Supplemental Areas. It's great that you have multiple Supplemental Areas and you're going farther than you were on the regular routes, but to limit those to 7:00 p.m. and not providing them on the weekends -- or on holidays, is not inclusive to those that live in Monroe County that have disabilities.”

“Also, I am interested in learning more about the weekend scheduling policies and procedures. I'm not pleased with you moving away from being allowed to schedule rides seven days a week, going down to five days a week and also closing that schedule on some of the weekends at one o'clock in the afternoon. Losing four hours. We already lose an hour for the week because it's closed for, according to recordings on the phone, for training purposes for the staff. So we're already losing hours where we can schedule throughout the week and we're losing more.”

“So that's what I have to say and the rest I will provide in writing.”

End of Comments from Justin Young

### **Alicia M. Zona**

Alicia submitted comments in writing on behalf of her mother, Dorothy De Croce, during the comment period. Her comments are about the Service Area.

#### **Alicia's Written Comments from the Comment Period**

Per the attached letter dated October 30, 2017, I am very frustrated with the service area for RTS Access and the implications of it that negatively impact having transportation for my soon to be 91 year old mother to come to my house for family events and visits. Since I am considered in the supplemental area and just .42 I believe outside of the 3/4 mile rule, I cannot arrange for transportation until the day before she needs to be transported which means it is impossible to plan things when the reality is I may not even be able to secure transportation for her. I want to be sure that my home address is included in the new busing area. I don't live in a remote area and RTS buses go up and down Elmgrove all the time, yet my house is probably about 1/4 mile off of Elmgrove. Yesterday I was made aware of the hearing that took place on 4/2. If I had known I would have been there. I would be happy to speak at your board of directors meeting to plead with them to help me.

October 30, 2017

Dear Mr. Carpenter:

My 89-year old mother is a resident at St. Ann's Home located at 1000 Portland Avenue. She is confined to a wheelchair. I recently learned from a social worker about RTS Access and my mother was approved for the service. We've used the service two times where she was transported from St. Ann's Home to her grandson's home for the celebration of the birth of her first great-grandson and then for his baptismal. Both times, we were very pleased with the service and my mother even commented about how nice the drivers were to her. Her grandson (my son- Michael Zona) lives at 862 Guinevere Drive in Greece.

My mother's birthday is August 25th and I planned to host a family birthday celebration at my home that weekend and had out of town guests coming to the party. I called RTS Access the week prior to arrange for the ride and was told that my house is out of your service area. I live at 154 Boca Avenue in Greece which is 3 miles south of my son's house. The person I spoke with told me I could call back the day prior and if they had the resources available, I could arrange to have her transported for a higher price (I believe \$16).

When I called the day prior, no services were available so I had to hire Genesee Transportation and paid \$100.00 (which was the least expensive service I could find) to get her to my home! I spoke to the person at RTS Access and asked for them to describe to me the area that RTS Access service doesn't cover which includes the area I am located in and it is basically a 1 mile perimeter around me. I don't live in a remote area. I live off of Ridgeway Avenue between Long Pond Road and Elmgrove Road behind Lodge on the Green Party House. It is frustrating to me that service to my home cannot be booked in advance and is up in the air until the day prior to when she needs to travel to my home and then she can still be without a ride based on availability.

I recently heard on the news that RTS is looking to redesign their public transportation system and was hoping that my area would become part of your service area. In the meantime, I am hoping that some exception can be made so that my mother can come to my home and I can be assured that the transportation is available.

Thank you for your time and I look forward to your response.

Sincerely,

Alicia M. Zona

End of Comments from Alicia Zona

End of Public Comments from the April 02, 2019 Public Hearing about Proposed Paratransit Plan Changes