

U.S. Department of Transportation Federal Transit Administration 400 Seventh St., S.W. Washington, D.C. 20590

December 7, 2006

Mr. Harold Leese

Complaint #2006-0253

Dear Mr. Leese:

This is a letter of finding in response to your complaint against the Suburban Mobility Authority for Rapid Transit (SMART). Your complaint alleges that service reductions proposed by SMART are regressive and would have a disparate impact on minority persons, in violation of Title VI of the Civil Rights Act of 1964.

The Federal Transit Administration (FTA) Office of Civil Rights (TCR) works to ensure non-discriminatory, equitable, accessible, and safe public transportation in support of FTA's mission to enhance the social and economic quality of life for all Americans. This includes ensuring that recipients of FTA funds comply with Title VI of the Civil Rights Act of 1964. Title VI states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program receiving Federal financial assistance." (42 U.S.C §2000(d)). When an individual or organization files a discrimination complaint under Title VI, our office investigates the complaint and determines the merits of the allegations based on evidence collected and relevant Department of Transportation (DOT) policy, guidance, and procedures.

The remainder of this letter summarizes your allegations, discusses how the office investigated your complaint, references the applicable provision in the U.S. Department of Transportation's Title VI Regulations and FTA Title VI guidance, analyzes the merits of your complaint, and states our conclusions. We have concluded that SMART did not violate Title VI of the Civil Rights Act of 1964 or the DOT Title VI regulations when it implemented service changes in response to the City of Livonia, Michigan's decision to withdraw from the Rapid Transit Authority.

Allegations

Your complaint, dated June 7, 2006 states that, "the SMART implementation of proposed service reduction on November 8, 2005 as a result of the city of Livonia, MI to opt out of

the Wayne County Transit Authority (by public vote) is regressive because the state funds were shifted. This is against my civil rights as protected by Title VI of the Civil Rights Act. This reduction will have a disparate impact on those who want to help those unable to drive. With fewer travel options than the majority population of the city and suburbs, they will bear the brunt of the cutbacks and the loss of over \$2 million per year in operating subsidies."

Your June 7, 2006 letter also included allegations of discrimination on the part of two additional recipients of FTA funds, the Michigan Department of Transportation (MDOT) and the Southeast Michigan Council of Governments (SEMCOG).

Investigation

Your complaint was forwarded to the FTA Office of Civil Rights from the U.S. Department of Transportation's Office of Civil Rights in July 2006. On August 4, 2006 we forwarded your complaint to SMART and requested that the agency respond to your allegations. SMART provided a response on November 30, 2006 (see attachment #1).

In our letters to you dated August 3, 2006 and August 7, 2006, we requested that you clarify your allegations against MDOT and SEMCOG and provide additional information as to why you believe these agencies have violated Title VI. Although we received your responses to these requests in letters dated August 17, 2006 and September 22, 2006, neither response clearly articulates allegations of discrimination that our office could investigate. As such, we have not responded to your allegations against MDOT and SEMCOG.

Your complaint against SMART alleges that the agency used a neutral practice (in this case, changes in the manner in which transit service is provided to the public) that has had a disparate impact on minority persons. We have analyzed this allegation using standards established by the U.S. Department of Justice's (DOJ) Civil Rights Division. Under the DOJ guidance, a complainant must demonstrate by a preponderance of the evidence that a neutral practice has a disproportionate adverse effect on a group protected by Title VI. If a complainant makes such a showing, the defendant then must prove that there is a substantial legitimate justification for the practice. If the defendant is able to show such a justification, the complainant can still prevail if it is able to show that there exists a comparably effective alternative practice which would result in less disproportionality or the defendant's justification is a pretext for discrimination.

Relevant Title VI Policy and Guidance

The DOT Title VI regulations prohibit recipients of FTA funds from intentionally discriminating against persons on the basis of race, color, or national origin, or undertaking activities that have the effect of denying benefits to, excluding persons from participation in, or discriminating against persons on these bases.

In particular, the DOT Title VI Regulations at 49 CFR §21.5(b)(2) state that

• "A recipient, in determining the types of services, financial aid, or other benefits, or facilities which will be provided under any such program, or the class of person to whom, or the situations in which, such services, financial aid, other benefits, or facilities will be provided under any such program, or the class of persons to be afforded an opportunity to participate in any such program; may not, directly or through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin"

The appendix to the DOT Title VI Regulations state:

• "No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin" (49 CFR 21 Apendix C Section (iii)).

In addition to the DOT Title VI regulations, FTA has issued guidance to transit providers on ensuring that changes in service do not have disparate impacts. FTA's Title VI guidance recommends that transit agencies serving populations of 200,000 persons or greater, "evaluate system-wide service changes and proposed improvements at the planning and program states to determine whether the overall benefits and costs of such changes or improvements are distributed equitably and are not discriminatory." (See Title VI Circular 4702.1 Chapter III part 3a(3)).

When TCR receives complaints of disparate impacts resulting from changes made to a recipients' transit service, we review the allegations in light of the provision at 49 CFR §21.5(b)(2), 49 CFR 21 Appendix C, and FTA's Title VI guidelines to recipients.

Analysis of your complaint

Your complaint has not demonstrated that the service changes implemented by SMART would have a disproportionate adverse effect on minority persons. Aside from your assertions that the changes would be "regressive" and that persons unable to drive would bear the brunt of the service cuts, your complaint offers no evidence that the service changes would have a disproportionately adverse effect on the minority population.

In it's response to your complaint, SMART provided more details on the service changes that were scheduled to take effect on November 27, 2006. SMART has proposed eliminating seven routes, the 285, 295, 297, 305, 315, 810, and 820 and adding routes to provide enhanced service to Redford Township, Farmington and Farmington Hills and new service to Garden City Hospital. Although some areas within SMART's current and former jurisdiction would receive reductions in transit service, other areas would receive enhanced service (see complete list of service changes included as attachment #2). We

cannot conclude that the minority population would be disproportionately impacted by the changes absent a demographic analysis of the populations served by the routes in question.

In addition, SMART has demonstrated that it has a substantial legitimate justification for proposing the service changes. SMART's proposal resulted from the City of Livonia's decision to withdraw its membership, and its funding, from the regional transit authority. SMART did not initiate or participate in the ballot proposal that lead to the City's withdrawl from the system. (Because the City of Livonia does not receive financial assistance from FTA we did not investigate the City's decision to withdraw from the transit system in the course of responding to your complaint).

Conclusion

Based on the information gathered in our investigation, and pursuant to the legal framework for evaluating disparate impact complaints, we have concluded that SMART's service changes do not violate the DOT Title VI Regulation at 49 CFR § 21.5(b)(2). However, consistent with our guidance in Chapter III of Circular 4702.1, we have requested that SMART conduct a more detailed demographic analysis of the population that would be impacted, both positively and negatively, by the changes in question.

If you have information that you believe would cause the FTA Office of Civil Rights to reconsider its conclusions, please provide this information within 60 days of the date of this letter.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. In the event that we receive such a request, we will seek to protect, to the extent provided by law, personal information, which, if released, could constitute an unwarranted invasion of privacy.

We appreciate your cooperation in this matter. If you have any further questions, feel free to contact David Schneider, Title VI Coordinator at (202) 493-0175 or at his email address, David.Schneider@dot.gov.

Sincerely,

Michael A. Winter

Director, FTA Office of Civil Rights

Cc: Dwight Sinks, FTA Region 5 Civil Rights Officer

Attachment #1
SMART Response to Complaint #2006-0253



November 30, 2006

First National Building 660 Woodward Avenue Detroit, Michigan 48226 (313) 223-2100

Federal Transit Administration Office of Civil Rights Attn: Mr. Michael A. Winter 400 Seventh St., S.W. Washington D.C. 20590

Re:

Complaint # 2006-0252

ZOOD DEC -U A II: 20

Dear Mr Winter:

Let me first apologize for the delay in your receipt of this response to the above referenced complaint.

FTA has advised SMART that its, "...Office of Civil Rights (TCR) has received a discrimination complaint against...(SMART) under Title VI of the Civil Rights Act of 1964," and you have asked that we respond to the Complainant's allegations, a copy of which was included with your letter. The Complainant, Mr. Harold Leese , alleges a Title VI violation as follows:

"The SMART implementation of proposed service reduction on November 8, 2005 as a result of the city of Livonia, MI to opt out of the Wayne County Transit Authority (by public vote) is regressive because state funds were shifted. Thus [sic] is against my civil rights as protected by Title VI of the 1964 Civil rights Act. This reduction will have a disparate impact on those who want to help those unable to drive."

As the FTA knows, Mr. Leese's complaint stems from a validly held city-wide election in which a majority of Livonia residents voted to "opt-out" of the Wayne County Transit Authority, and thereby lose SMART service to their community. Given SMART's, 30 years of effort at operating, maintaining and enhancing a regional transportation system, along with the loss of nearly \$3 Million in tax revenue, (and SMART jobs) for a region with some of the highest unemployment in the country, though largely beyond the scope of this response, has raised the ire of more than Mr. Leese. Still, while not unsympathetic to Mr. Leese's complaints, they are legally deficient, wholly unfounded and completely without merit.

FTA's letter cites to Title VI's protection from discrimination stating, "no person...shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination..." Importantly however, Mr. Leese does not claim discrimination on the grounds of race, color, or national origin. Nor does Mr. Leese complain of discrimination based on any other protected class. Rather, Complainant alleges that the service reduction required by the public vote "is regressive because state funds were shifted. Thus is against my civil rights as protected by Title VI of the 1964 Civil Rights Act." Assuming







Mr. Michael Winter November 30, 2006 Page Two

arguendo that state funds were "shifted" (though the meaning of this term is unclear), absent more, this would not and could not give rise to a claim of discrimination against a protected class. As such, the complaint fails to state a valid claim.

Interestingly, Mr. Leese goes on to allege a "disparate impact" insofar as "This reduction will have a disparate impact on those who want to help those unable to drive." Again, even assuming *arguendo* the veracity of this unsupported allegation, it is wholly and utterly without legal merit as grounds for a claim of Title VI discrimination. Those who wish to help the transit dependant are not, based on that fact alone, within the penumbra of protections provided by Title VI.

Notwithstanding the foregoing, SMART neither wishes to appear insensitive to Mr. Leese's frustration over the impending loss of SMART service, nor though, is it unmindful of its legal and regulatory obligations.

As FTA knows, a significant percentage of SMART's revenue is derived through imposition of an ad velorem property tax. This tax is levied and collected by three of the four counties the Authority services. Two of the SMART directly operated counties collect the tax pursuant to Public Act 196, MCL 124.451 et sec. The City of Livonia availed itself of the Act's section 8, which allows public entities to withdraw. Act 196 states at MCL 124.458(2)

124.458. Conditions to release from membership in public authority; taxes; transportation services; evidence of release; withdrawal from public authority; violation of MCL 168.1 to 168.992 applicable to petitions; penalties; notice.

- (2) Notwithstanding subsection (1) [which provides an alternative means of withdrawal ed.], an entity which is a political subdivision that is a member of a public authority or the portion of a city, village, or township, which portion is a member of a public authority may be released from membership in the public authority if all of the following conditions are met:
- (a) The entity desiring to withdraw from the authority has approved the question by a majority of the qualified and registered electors voting at a general or special election held in November before the expiration of a tax authorized to be levied under this act.

* * *

Mr. Michael Winter November 30, 2006 Page Three

A complete copy of this section is enclosed for your review. Importantly, Mr. Leese does not, and could not, allege or make out a case for discriminatory intent, either in the act of withdrawal or SMART's implementation of the service changes. That is, SMART did not initiate or participate in the City of Livonia's efforts to withdraw from the system, nor can a case be made for discriminatory intent in relation to the implementation of the service changes.

The relevant tax period commenced on December 1, 2005 and ran for one year until November 30, 2006. The City of Livonia's commitment to provide tax support through the tax year was complied with. All of the service changes were made at the same time, on November 30th, and therefore affected all residents equally. Given the facts, Complainant cannot set up that either a discriminatory intent or effect was established or that a pattern or practice of discrimination was allowed to continue. Rather, the only conclusion is that SMART acted in a nondiscriminatory way to allocate limited resources for the benefit of all residents in the SMART service area.

Finally, please know that SMART conducted public hearings relating to its service changes on September 14, 2006, and also made a number of service changes in an attempt to ease the problems associated with the City's withdrawal. SMART added no less than 4 new routes and made other changes that you will find summarized and enclosed herein. Further, the City of Livonia itself attempted to address the service interruptions the vote created, at least insofar as they related to ADA service. Copies of documents in my possession relating to the City's efforts are also enclosed.

To summarize, the statutory scheme set forth in Public Act 196 that allowed for the taxation in support of regional transit also allows for the withdrawal of communities from that same tax burden. Following those regulations, the City held a vote of the electorate that, unfortunately, resulted in the City's withdrawal from the system at the end of the tax year. SMART neither initiated nor participated in the passage of that ballot proposal. The effects of that vote (the City of Livonia's withdrawal from the SMART system), and SMART's implementation of that vote have neither discriminatory intent nor a discriminatory purpose. Nor does it have a discriminatory effect.

At the close of the tax year, SMART ceased the service underwritten by those tax dollars, following public hearings on the issues. Notwithstanding the foregoing, SMART added routes and altered existing routes in an effort to minimize the impact of the City's withdrawal. Complainant, Harold Leese, has wrongly asserted that SMART's actions were in violation of Title VI, since he does not and cannot show that SMART was engaged in conduct proscribed by this section with a discriminatory purpose, or conduct which affects a protected class.

SMART endeavors to provide the best service it can, efficiently, cost effectively and as safely as possible. While we sympathize with Mr. Leese's frustration and recognize the many difficulties that are faced by those who rely on transit, his claims of discrimination must ultimately fail for all of the foregoing reasons.

Mr. Michael Winter November 30, 2006 Page Four

Again Mr. Winter, let me apologize for the delay in your receipt of this response and any inconvenience or difficulties that arise as a result. Please let me assure you that SMART too takes such claims as those raised by Mr. Leese with the utmost seriousness. We appreciate your patience and courtesies in this regard. Should you have any questions, please do not hesitate to contact me.

Yours very truly,

Avery E. Gordon General Counsel

DIRECT DIAL (313) 223-2153

Enclosures

cc: Mr. David Schneider, FTA Office of Civil Rights Dwight Sinks, FTA Region 5 Civil Rights Officer

PUBLIC TRANSPORTATION AUTHORITY ACT (EXCERPT) Act 196 of 1986

124.458 Conditions to release from membership in public authority; taxes; transportation services; evidence of release; withdrawal from public authority; violation of MCL 168.1 to 168.992 applicable to petitions; penalties; notice.

Sec. 8. (1) Except as otherwise provided in subsection (2), a political subdivision that is a member of a public authority or the portion of a city, village, or township, which portion is a member of a public authority may be released from membership in the public authority if all of the following conditions are met:

(a) Adoption of a resolution by a majority of the members elected to and serving on the legislative body of the political subdivision requesting release from membership.

(b) Acceptance of the request by a 2/3 vote of the members serving on the board of the public authority, excluding the members representing the political subdivision requesting release.

(c) Payment or the provision for payment is made regarding all obligations of the political subdivision to the public authority or its creditors.

(2) Notwithstanding subsection (1), an entity that is a political subdivision and is a member of a public authority or the portion of a city, village, or township, which portion is a member of a public authority, may be released from membership in the public authority if all of the following conditions are met:

(a) The entity desiring to withdraw from the authority has approved the question by a majority of the qualified and registered electors voting at a general or special election held in November before the expiration of a tax authorized to be levied under this act.

(b) Subject to subsection (6), a petition that bears the signatures of registered electors of the entity equal to at least 20% of the number of votes cast in the political subdivision or portion of a city, village, or township for all candidates for governor in the last general election in which a governor was elected and that requires the governing body of the entity by resolution to submit the question to its electors at the next general or special election is filed not less than 60 days before the election with the clerk of the entity presenting the question.

(c) The vote upon the question approving the resolution is by ballot and is in substantially the following form:

"Shall _____ (township, village, city, or other) as provided by 1986 PA 196 withdraw from the authority as a member?

Yes ____

(d) All ballots are cast, canvassed, and the results of the election certified in the same manner as ballots on any other question submitted to the electors of the entity seeking withdrawal pursuant to the Michigan election law, 1954 PA 116, MCL 168.1 to 168.992.

(e) Payment or the provision for payment is made regarding all obligations of the political subdivision to the public authority or its creditors. If withdrawal is approved by a majority of the electors voting on the question, the decision will take effect at the expiration date of the tax and neither the authority nor officials of the political subdivision may appeal or amend this decision.

(3) A tax authorized to be levied by a public authority within the boundaries of the political subdivision or the portion of a political subdivision to be released shall continue to be levied for the period of time originally authorized and shall be paid over to the public authority originally authorized to be the recipient of the tax revenue. A political subdivision or portion of a political subdivision that has been released from an authority shall continue to receive transportation services from the authority until the political subdivision or portion of the political subdivision is no longer required to pay a tax levied by the authority.

(4) Release of a political subdivision or portion of a political subdivision from a public authority shall be evidenced by an amendment to the articles of incorporation executed by the recording officer of a public authority and filed and published in the same manner as the original articles of incorporation.

(5) A political subdivision or other entity that is part of a public authority under this act may withdraw from the public authority until the expiration of the thirtieth day following the date the public authority is incorporated or until the expiration of the thirtieth day after receiving notification under subsection (7), whichever is later, without meeting the conditions listed in subsection (1) or (2). If a public authority under this act has as a member a political subdivision that is part of a metropolitan statistical area, as defined by the United States department of commerce or a successor agency, and the metropolitan statistical area has a population of not less than 600,000 and not more than 1,500,000, a political subdivision or other entity that is part of the public authority may also withdraw from the public authority until the expiration of 30 days after the date on which the board of the public authority adopts a resolution calling for an election for the purpose

Page 1 Michigan Compiled Laws Complete Through PA 442 of 2006

of levying a tax pursuant to section 18, without meeting the conditions listed in subsection (1) or (2). If all or a portion of a city, village, or township is part of an authority incorporating as a public authority under this act, the city, village, or township may also decide to only withdraw a portion of the entity bounded by the lines described in section 4 from the public authority under the deadline established in this subsection. In addition, a political subdivision or other entity that is part of a public authority under this act may withdraw from the public authority in any year in which a tax authorized to be levied under this act expires, without meeting the conditions listed in subsection (1) or (2), if the political subdivision or entity makes the determination to withdraw by a vote of its legislative body held in January of that year. Further, if all or a portion of a city, village, or township is part of an authority incorporating as a public authority under this act, the city, village, or township may also decide to only withdraw a portion of the entity bounded by the lines described in section 4 from the public authority in that same January. However, if a tax is authorized to be levied in a political subdivision or portion of a political subdivision by a public authority under this act and the political subdivision or portion of a political subdivision withdraws pursuant to this subsection, the tax shall continue to be levied in the political subdivision or portion of a political subdivision for the period of time originally authorized. A political subdivision or portion of a political subdivision that withdraws from the authority shall continue to receive public transportation services from the authority until the political subdivision or portion of the political subdivision is no longer required to pay a tax levied by the authority.

(6) A petition under subsection (2), including the circulation and signing of the petition, is subject to section 488 of the Michigan election law, 1954 PA 116, MCL 168.488. A person who violates a provision of the Michigan election law, 1954 PA 116, MCL 168.1 to 168.992, applicable to a petition described in subsection (2) is subject to the penalties prescribed for that violation in the Michigan election law, 1954 PA 116, MCL 168.1 to 168.992.

(7) An authority that forms under this act on or after May 1, 2006 shall notify all political subdivisions or portions of any city, village, or township that are included in the authority that the political subdivision or portion of the political subdivision is included in the authority. The authority shall include in this notification notice of the right to withdraw from the authority under this section. The political subdivision or portion of the political subdivision that is notified has 30 days after receiving the notification to withdraw from the authority pursuant to subsection (5).

History: 1986, Act 196, Imd. Eff. July 10, 1986;—Am. 1990, Act 10, Eff. Mar. 1, 1990;—Am. 1998, Act 168, Eff. Mar. 23, 1999;—Am. 2006, Act 175, Imd. Eff. June 6, 2006.

Department of Community Resources

Livonia Community Transit 33300 Civic Center Drive Livonia, Michigan 734 468-2700



Jack Engebretson Mayor Linda McCann Director

To all current riders of the SMART paratransit buses:

As you know SMART transportation in Livonia will stop at the end of November of this year. If you will continue to need a ride you must fill out the information on the form below. In order for you to be placed on the Livonia Community Transit reservation list you must return this form along with your ADA certification form — completely filled out and signed - <u>bv September 25</u>, 2005 in the enclosed postage prepaid envelope.

Please be aware that being put on this list does not quarentee you a ride. The sooner you send back your request, the sooner we can try and work you into our existing schedule. The Livonia Community Transit Programischedules on a first-come, first-serve basis. We have many subscription and daily riders already on board.

Livonia Community Transit serves resident seniors 60 years and over and disabled persons. Transportation is within the City of Livonia with limited service outside of the City. The hours of service are seven days a week, with the first pick up at 7:00 a.m. and the last drop off at 7:00 p.m.

For a flat fee of \$2.00 each way, our drivers pick up the rider at their door. Drivers do not make change, riders must have exact fare or bus tickets can be purchased in advance for rider convenience. Tickets can be purchased at the Civic Park Senior Center, the Treasurer's Office or the Department of Community Resources in City Hall.

TO SCHEDULE A RIDE CALL 734 488-2700

NAME	PHONE	
ADDRESS	ZIP CODE	
EMERGENCY CONTACT NAME	PHONE	
PICK UP ADDRESS CONTACT NAME/PHONE	DROP OFF ADDRESS CONTACT NAME/PHONE	
PICK UP DAYS/TIMES	DROP OFF DAYS/TIME	



Livenia Community Transit ADA Certification Application

Name:			
Address:			Apt
City:		State:	Zip;
Home Phone:			
Date of Birth:/	1	Female	Male
By signing this document, I he including but not limited to the the medical information set for Community Transit system. I information set forth herein.	Livonia Commu Thi below to dete	nity Transit, permissic rmins my elicibility to	In to review and conside
Signature of Applicant:	<u>:</u>	Date	o e
Applicant's pi	hysician must c	omplete the informat	ian below.
PLEASE PRINT	:		
Attending Physician Name:			
Address;			
City:		1	
Telephane Number:			
Physician's Signature:			
1. What is/are the applicant's o	•		

Livonia Community Transit ADA Application page2

For questions, call (734) 488-2537

2. Is the disability temporary?
☐YES ☐NO If YES, expected duration until//
3. Please check the <u>one</u> mobility aid that the applicant uses most often:
MANUAL WHEELCHAIRPOWERED SCOOTERELECTRIC WHEELCHAIRNONE
LARGE WHEELCHAIRCANE OR WALKERSERVICE ANIMAL
4. Please indicate the applicant's level of independence (CHECK ONLY ONE)
Is able to get to a bus stop as long as there is a sidewalk
☐ Can independently get to the street for curb-to-curb service
Can get to the street only with the help of a personal care assistant
is unable to get to the sidewalk requires door-to-door service
Return completed forms to:
Livonia Community Transit City of Livonia 33000 Civic Center Drive Livonia, Mi 48154
\cdot

Attachment #2
SMART Proposed Service Changes

As a result of the City of Livonia's decision to 'opt out' of SMART services, several changes will take effect on November 27, 2006. While we will be eliminating several routes – 285, 295, 297, 305, 315, 810 and 820 – we will be adding routes to provide enhanced service to Redford Township, Farmington and Farmington Hills; and new service to Garden City Hospital. We will also be maintaining park and ride service to Farmington, Farmington Hills and Redford Township.

280 Middlebelt South

<u>NEW Route</u> along Middlebelt Rd connecting destinations such as Garden City Hospital, Inkster and Metro Airport. Service approximately every 60 minutes on all days.

305 Grand River Limited

Route and schedule modified. No service on Haggerty south of 10 Mile; no service on Middlebelt, 10 Mile or Orchard Lake. Instead of making limited stops in Detroit, route operates as do other SMART routes in Detroit: outbound customers may board at any stop and deboard starting at Telegraph. Inbound customers may board until Telegraph and deboard at any stop. Two Weekday morning trips from Detroit and one Weekday afternoon trip to Detroit are available. NEW Route 330 provides day, night and weekend service in this area.

330 Grand River-Beech Daly

<u>NEW Route</u> traveling along Grand River, 7 Mile, Beech Daly, Joy and Inkster. Connections to numerous other routes at Downtown Farmington, 7 Mile & Grand River, Garden City Hospital and Target (Dearborn Heights). Weekday and Saturday service over entire route; Sunday service on Grand River portion.

385 Orchard Lake

<u>NEW Route</u> serving Orchard Lake Rd, OCC Orchard Ridge, Downtown Farmington and Founders Park. Service approximately every 50 minutes, Weekday and Saturday.

805 Grand River Express

NEW Route providing direct Park and Ride service from Farmington, Farmington Hills and Redford to Downtown Detroit. New Park and Ride lot available at Bonaventure Skating Center (Grand River & Halsted). Downtown routing serves Blue Cross/Blue Shield via Beaubien and Lafayette. Peak-hour service with trips scheduled to meet common arrive/depart times.

In addition to several informational public meetings to be held in the coming weeks, SMART will hold two public hearings on September 14th.