



The Corporation of the Town of Milton

Report To:	Council
From:	Meaghen Reid, Director, Legislative & Legal Services/Town Clerk
Date:	December 13, 2021
Report No:	CORS-066-21
Subject:	2021 Accessibility Plan Status Report
Recommendation:	<p>THAT the 2021 Accessibility Status Report on the 2018-2023 Municipal Accessibility Plan attached as Appendix A, be received for information;</p> <p>THAT the 2021 Milton Transit Accessibility Plan, attached as Appendix B, be received for information.</p>

EXECUTIVE SUMMARY

As required by Ontario Regulation 191/11-Integrated Accessibility Standards Regulation (IASR), this 2021 Annual Accessibility Status Report will provide Council and the public the Town of Milton's progress from 2019-2021 with regards to the 2018-2023 Multi-Year Accessibility Plan to prevent/ remove barriers and meet requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

REPORT

Background

The AODA was passed in 2005 with the vision of creating a fully accessible Ontario by 2025. The AODA gave the Province the mandate to create sets of standards in accessibility which applies to both public and private sector organizations.

The IASR was enacted in July 2011 and establishes accessibility standards for information and communications, employment, transportation, the design of public spaces and customer service. The requirements apply to the public, private and not for profit sectors and have compliance dates ranging from 2011 to 2021.

In 2017, the Town of Milton released its 2018-2023 Multi-Year Accessibility Plan, in accordance with the AODA and IASR. The plan outlined the Municipality's strategy to prevent and remove barriers to accessibility, which included how phased in requirements under the AODA will be met.



Discussion

Staff from across the Corporation have provided updates for the 2021 Accessibility Status Report. Furthermore, the 2021 Milton Transit Accessibility Plan was prepared by Community Services staff and approved by members of the Milton Accessibility Advisory Committee. It is posted on the Town's website for the public and to meet the requirements of the IASR.

2021 Accessibility Status Report - included as Appendix A

The 2021 Accessibility Status Report provides an update on actions the Town of Milton has taken to comply with the IASR, as well as additional activities aimed at identifying, preventing and removing barriers to persons with disabilities when accessing Town Programs, services and facilities.

2021 Milton Transit Accessibility Plan - included as Appendix B

The 2021 Milton Transit Accessibility Plan sets out how Milton Transit will continue to prevent and remove barriers to persons with disabilities and how it will ensure continued compliance with the IASR.

Financial Impact

The Town's accessibility plan is managed with existing staff resources. Where specific initiatives require an initial or on-going investments, funds are approved by Council in accordance with the Town's Budget Management Policy (Policy 113).

Respectfully submitted,

Troy McHarg
Commissioner, Corporate Services

For questions, please
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Attachments

Appendix A - 2021 Accessibility Status Report
Appendix B - 2021 Milton Transit Accessibility Plan

CAO Approval
Andrew M. Siltala
Chief Administrative Officer



Recognition of Traditional Lands

The Town of Milton resides on the Treaty Lands and Territory of the Mississaugas of the Credit First Nation. We also recognize the traditional territory of the HuronWendat and Haudenosaunee people. The Town of Milton shares this land and the responsibility for the water, food and resources. We stand as allies with the First Nations as stewards of these lands.



The Corporation of the
Town of Milton

Appendix A
2021 Accessibility Status Report
2018 – 2023 Municipal
Accessibility Plan



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2021 Accessibility Status Report

Ontario Regulation 191/11- Integrated Accessibility Standards (IASR) to the Accessibility for Ontarians with Disabilities Act (AODA) requires that municipalities with 50 or more employees create a written multi-year accessibility plan that outlines the steps a municipality will take to prevent and remove barriers to accessibility. The IASR also requires that annual status reports on the progress of measures taken to implement the plan be prepared.

This 2021 accessibility status report provides an update on actions the Town of Milton (the Town) has taken to implement the Town's 2018-2023 Municipal Accessibility Plan, which details the Town's strategy for meeting AODA and IASR requirements. This report will be posted on the Town of Milton's website (milton.ca). The 2018-2023 Municipal Accessibility Plan is also available on milton.ca.

Legislation

Ontarians with Disabilities Act

The Ontarians with Disabilities Act (ODA) was established in 2001 to improve opportunities for persons with disabilities. Effective December 1, 2015, twelve sections of the ODA were repealed as they were duplicated by the AODA or the IASR. This change has reduced the administrative burden on municipalities.

Accessibility for Ontarians with Disabilities Act

In 2005, the Ontario Government passed the AODA to benefit all Ontarians by developing, implementing and enforcing accessibility standards. These standards work to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.

Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation

The IASR was enacted in July 2011 and establishes accessibility standards for information and communications, employment, transportation, the design of public spaces and customer service. The requirements apply to the public, private and not for profit sectors and have compliance dates ranging from 2011 to 2021.

More information on the AODA and the IASR can be found on <https://www.milton.ca/en/town-hall/town-hall-accessibility.aspx>

Town of Milton’s Accessibility Advisory Committee (MAAC)

The AODA requires that municipalities with a population of over 10,000 people must establish an accessibility advisory committee to advise Town Council on the preparation of accessibility plans and the achievement of actions within the plan.

The three main activities of an accessibility advisory committee are to:

1. Advise Town Council about the requirements and implementation of accessibility standards and the preparation of accessibility reports and other matters on which Council might seek its advice;
2. Review site plans and drawings described in Section 41 of the Planning Act; and
3. Perform all other functions that are specified in the Regulations.

MAAC, established in 2002, is a volunteer citizen advisory committee. It is comprised of between 5 and 7 members, the majority of which must be persons with disabilities, and one Town Council representative. Members are appointed by Council for their knowledge, experience and dedication to eliminating barriers and promoting universal accessibility.

MAAC’s mandate is to advise Council and staff on the promotion and facilitation of a barrier-free town for citizens of all abilities, including persons with disabilities.

Information related to the activities of MAAC are included within the status update provided below.

2019-2020 Town of Milton’s Status Updates

2018-2023 Multi-year Accessibility Plan	Status Updates
Preparing an annual update on the Multi-Year Accessibility Plan, as required by the IASR	This report is prepared for this purpose
Submitting compliance reports to the Province in 2019, 2021 and 2023, demonstrating compliance with components of the IASR	The Town has submitted the compliance report for 2019 and is in the process of submitting the compliance report for 2021 as required by the Ministry for Seniors and Accessibility
Reviewing existing accessibility procedures and updating them, as required	The Town continues to monitor and review existing accessibility policies to be in

	compliance with the AODA and IASR. No updates in 2019-2020.
Continuing to provide training to new staff on the IASR and the Ontario Human Rights Code as part of the Town's onboarding process	A comprehensive series of training sessions on the AODA and IASR has been provided to existing staff in 2019 and is now part of the new staff onboarding process.
Consulting with and seeking the input of MAAC on physical improvement projects and other Town initiatives	<p>In 2019, MAAC has provided comments on 8 site plan reviews, including accessible parking spaces and accessible path of travel. Comments were provided to Planning staff. MAAC also approved annual Transit Accessibility Plan. In addition, other topics were discussed including but not limited to Committee orientation, website development, park redevelopment projects, and accessible Halloween.</p> <p>In 2020, MAAC has provided comment on 16 site plan reviews, including accessible parking spaces and accessible path of travel. Comments were provided to Planning staff. MAAC also approved annual Transit Accessibility Plan. In addition, other topics were discussed including but not limited to accessible features at parks, updates to Ontario Building Code, updates on park redevelopment projects, accessible pedestrian signals.</p>
Monitoring the review of accessibility legislation by the Province to determine impacts to the Town and reporting to Town Council, as appropriate	The Town continued to monitor the changes to the legislations. There was no change to the legislations in 2019-2020.
Complying with the accessibility requirements set out in the Municipal Elections Act, 1996	This item was resolved in 2018. During the 2018 Municipal Election, the Town of Milton took actions to prevent and remove barriers to persons with disabilities and to meet the



when conducting the 2018 municipal and school board election	requirements of IASR. On December 17, 2018, staff presented the 2018 Municipal Election Accessibility Report to Council. No further updates in 2019-2020.
Continuing to share information and network with accessibility staff from Halton's municipalities, the Ontario Network of Accessibility Professionals (ONAP) and the Association of Municipal Managers, Clerks and Treasurers of Ontario (AMCTO)	During 2019-2020, Town staff continued to be part of ONAP network. Furthermore, Town staff also attended information workshops hosted by AMCTO on converting accessible documents in 2020.
Updating all Town of Milton websites to WCAG 2.0 Level AA by January 1, 2021	In November 2019, the Town launched its updated website, which is compliance with WCAG 2.0 Level AA. Since then, Town staff continue to ensure that all documents uploaded to the Town's website are accessible.
Working with the Town's web services vendor to make web page accessibility checking an automated step in page publication	In May 2019, the Town implemented SiteImprove. It is a software for websites' quality assurance and accessibility checking. The web editor could perform a full and liable accessibility check before any webpage publishing.
Implementing a periodic spot check of web page accessibility by staff	Since launching the new website in November 2019, Town staff continue to ensure that all new documents and web pages are accessible upon publishing.
Continuing to take advantage of learning opportunities provided by the Accessibility Directorate of Ontario and accessibility forums	In 2019-2020, Town staff have taken part in formal/informal learning opportunities provided by the Chang School of Continuing Education at Ryerson University, AMCTO and other education institutions.

Next Steps

Town staff will continue to meet the requirements of the AODA and IASR and undertake further actions to prevent and eliminate barriers to persons with accessibilities. They include the following:

- Continuing to prepare an annual update on the Multi-Year Accessibility Plan, as required by the IASR;
- submitting compliance reports to the Province in 2021 and 2023, demonstrating compliance with components of the IASR;
- reviewing existing accessibility procedures and updating them, as required;
- continuing to provide trainings to all Town staff on accessibility requirements from the AODA and IASR;
- continuing to consult with and seeking the input of MAAC on physical improvement projects and other Town initiatives;
- continuing to monitor the review of accessibility legislations by the Province to determine impacts to the Town and reporting to Town Council, as appropriate;
- complying with the accessibility requirements set out in the Municipal Elections Act, 1996 when conducting the 2022 municipal and school board election;
- continuing to monitor and ensure all Town of Milton websites and social media accounts meet WCAG 2.0 Level AA;
- continuing to share information and network with accessibility staff from Halton's municipalities, the Ontario Network of Accessibility Professionals and the Association of Municipal Managers, Clerks and Treasurers of Ontario;
- continuing to take advantage of learning opportunities provided by the Accessibility Directorate of Ontario and accessibility forums.

2021 Milton Transit Accessibility Plan

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Section 1 Executive Summary

As one of Canada's fastest growing municipalities, Milton Transit plays a key role in providing a safe and reliable mobility option to residents and visitors. A steady increase in ridership over the past several years has continued to raise demand for conventional and specialized service, with improved accessibility. Driven by customer need, expectation, corporate policies and Provincial legislative requirements, a forward-thinking accessibility presence remains a priority for Milton Transit.

Accessibility is for everybody!

To promote Milton Transit as a viable transportation option, all customers must have access. The commitment to purchase fully accessible transit fleet over the past 13 years is a significant step in this direction. However, overall system accessibility consists of components beyond accessible transit buses, such as:

- Increased service levels
- Barrier-free pedestrian connections
- Accessible/hard surface bus stops
- Passenger amenities (e.g. shelters, wayfinding, etc.)
- Efficient snow clearing standards
- Availability of accessible transit information
- Supportive operational programs, policies and customer service

For many, Milton Transit is the primary means of travel to and from work, school, medical appointments, community events and social activities. As Milton Transit accessibility improves, everyone benefits.

The purpose of the Transit Accessibility Plan is to identify barriers and establish strategies to address local accessibility issues and any regulatory requirements in 2021. Consistent with requirements under the Integrated Accessibility Standards Regulation (IASR) 191/11, this plan will undergo public consultation to discuss and assess progress toward full system accessibility.

Milton Transit is committed to:

- the continuous improvement of accessible public transit services;

- including people with disabilities in developing/reviewing the annual accessibility plan, in parallel with the Town's annual accessibility plan;
- providing accessible services to customers, employees and contractors; and
- optimizing municipal investments to provide the right service for individuals (e.g. door-to-door specialized transit, accessible conventional services, etc.).

Section 2 Milton Transit Services Profile

Milton Transit delivers conventional and specialized transit services. Tables 1 and 2 provide a summary of operational profiles.

Conventional Service - 2020 Service Profile

Table 1: Summary of Conventional Transit service

Criteria	Description
Type of service	Fixed route, interlined - radial service at the Milton GO Station terminal (780 Main Street East). Contracted operation provided by Diversified Transportation (PWTransit Canada) with Town-owned fleet.
Hours of service	<ul style="list-style-type: none"> Monday to Friday 5:20 am to 10:11 pm Saturday 7:10 am to 7:40 pm
Annual passenger boardings (forecast estimate)	247,399
Number of fixed routes	<ul style="list-style-type: none"> 10 regular fixed routes 3 school special routes
Types of services	Conventional service, school specials, industrial specials, Trans-Cab, GO Drop-off shuttle service
Fleet composition	<ul style="list-style-type: none"> 16 accessible heavy-duty, conventional buses 4 accessible medium-duty buses

Specialized Service - 2020 Service Profile

Table 2: Summary of Specialized Transit service

Criteria	Description
Type of service	<p>Shared ride, door-to-door, pre-booked service for eligible residents and visitors. Registrants are able to book trips up to seven (7) days in advance.</p> <p>Contracted operation provided by Diversified Transportation (PWTransit Canada), subcontracting to Milton Taxi and PWTransit using small buses, sedans and accessible vans.</p>
Hours of service	<ul style="list-style-type: none"> • Monday to Friday 5:20 am to 10:11 pm • Saturday 7:10 am to 7:40 pm
Annual passenger trips (forecast estimate)	11,301
Fleet requirements	<ul style="list-style-type: none"> • 6 accessible mini-buses

Section 3 Previous Accessibility Achievements

Milton Transit has executed many accessibility initiatives over the last several years, along with the development and enhancement of policies and procedures. As a result, Milton Transit has implemented many of the requirements set out in the ISAR 191/11 ahead of regulatory compliance dates. Milton Transit continues to update policies, procedures and services to improve accessibility, reliability, connectivity and enhance customer mobility options.

The following accessibility improvements have been completed:

Conventional Transit

- Purchased fully accessible buses. All conventional transit buses have been 100% accessible since 2009. These buses include accessibility features such as high contrast stanchions/handrails, illuminated external electronic destination signs, stop request buttons/pull cords, slip resistant flooring and the clear identification of priority and courtesy seating areas.
- Installed bus stops, shelters, landing pads at a variety of bus stop locations throughout the service area.
- Installed updated static departure/scheduling information at all bus stops.
- Installed accessibility infrastructure at the Milton GO Station.
- Installed a bus only lane on Drew Centre, at the Milton GO Station.
- Installed and implemented electronic visual and audible annunciation and pre-board annunciation equipment.
- Identified support persons and removed fare requirement.
- Made available accessibility equipment information on Milton Transit web page (www.miltontransit.ca).

Specialized Transit

- Rebranded Milton Paratransit Services to Milton access+ specialized services.
- Developed and implemented centralized reservation process, same-day booking process, and established no-show / cancellation policies.
- Aligned specialized transit service area with conventional service area, while maintaining access to all eligible residents within municipal boundaries.

- Implemented updated eligibility procedures for the specialized transit application process.
- Introduced categories of eligibility as part of the eligibility process under the eligibility criteria for specialized transit services.
- Established an independent in person eligibility and appeal process.
- Introduced specialized busing for some high demand service delivery and unique mobility device requirements.
- Committed to a Memorandum of Understanding (MOU) with all Greater Toronto and Hamilton Area (GTHA) specialized transit service providers to accept registrants and associated service connections (if / when connections are established).

Administration and Policy

- Updated Milton Transit website with greater opportunities for increased customer service and accessible display of transit information, policies and programs.
- Use of Milton Transit social media, including Twitter and Facebook.
- Implemented Metrolinx Trip Planner, centralizing all system information across the Greater Toronto and Hamilton Area (GTHA).
- Established corporate accessibility policies.
- Implemented emergency preparedness, response and evacuation procedures for operators of conventional and specialized transit service.
- Implemented fare and service parity in parallel with accessible conventional services, effective January 2012.
- Developed criteria, policies and procedures for service use by visitors and registrants from other municipalities for specialized transit services.
- Developed associated policies and procedures for the communication of service delays and travel with companions and children on specialized transit services.
- Participated on the Ontario Public Transit Association (OPTA) Accessibility Committee and GTHA Accessibility Working Group, providing for the collaborative sharing of best practices among Ontario transit systems with respect to achieving accessibility specifically in regard to IASR 191/11 requirements

2020 Work Plan Progress

The 2020 Accessibility work plan consists of administrative, service-related and infrastructure rehabilitation projects. The following table provides a summary of actions and progress to date:

Actions	Progress to Date
1. Continue to improve infrastructure at bus stops and other related transit infrastructure. Install bus pads and shelters at various locations.	Postponed to 2021.
2. Finalize the rollout of Milton Transit branding on new bus stop signs, ensuring sign visibility and legibility.	Postponed to 2021.
3. Implement service improvements to maintain service reliability, improve coverage.	Ongoing. Due to COVID-19, service adjusted to reflect lower service demand.
4. Implement new, dedicated specialized service delivery model to accommodate growth and enhanced customer service.	Completed. Dedicated service implemented January 2020. Additional vehicles added in April and September 2020.
5. Pilot a mobile fare payment option	Completed. New mobile fare payment app through Token Transit implemented September 2020 (two-year pilot).
6. Accelerate Fare Policy changes	Completed. Fare Policy changes to reflect: <ul style="list-style-type: none"> • Two-hour universal transfer • Kids 12 and under ride free
7. Develop an Alternative Service Delivery (ASD) Strategy for implementation in 2020.	In progress. Part of recommendations from 2019-2023 Transit Service Review and Master Plan Update for implementation in March 2021.
8. Initiate replacement of specialized transit scheduling/booking software. The new system will provide specialized transit customers with better access to reserving trips, including online booking options.	Completed. Project awarded to Spare Labs for implementation in March 2021.
9. Install transit shelters at a number of bus stop locations throughout town.	Postponed to 2021.

Section 4 2021 Accessibility Work Plan

The following provides a summary of the actions planned in 2018 that will make Milton Transit more accessible:

- Continue to improve infrastructure at bus stops and other related transit infrastructure. Install accessible bus pads at various locations.
- Finalize the rollout of Milton Transit branding on new bus stop signs, ensuring sign visibility and legibility.
- Modify travel-training protocols to accommodate pandemic-related measures through Magnus Mode.
- Implement service improvements to maintain service reliability, improve coverage, etc.
- Develop and implement an alternative service delivery (ASD) strategy for implementation in 2021.
- Replace specialized transit scheduling/booking software. The new system will provide specialized transit customers with better access to reserving trips, including online booking options.
- Install transit shelters at a number of bus stop locations throughout town.

IASR 191/11 Transportation Compliance Initiatives

There are no compliance initiatives in 2021 specific to transportation services. For further details related to corporate IASR 191/11 compliance initiatives and subsequent work plans, please refer to the 2018 - 2023 Town of Milton Accessibility Plan.

It is important to note that the availability of sustainable resources contributes to the pace of progress for reducing or eliminating accessibility barriers. If resource constraints exist, prioritization of initiatives is required. While it is important to focus on the removal of barriers, it is equally important to recognize the vast steps taken in a relatively short timeframe.

Section 5 Methodology for Plan Review and Update

Consistent with requirements from the IASR 191/11, the 2018-2023 Town of Milton Accessibility Plan provides guidance for the 2021 Milton Transit Accessibility Plan. The Transit Accessibility Plan details accessibility initiatives that reflect IASR 191/11 compliance as well as supporting the continuous removal of accessibility barriers. Improvements are reported annually and are used to measure progress and develop subsequent work plans.

There are two (2) key inputs to the Transit Accessibility Plan, including:

10. Legislative and regulatory requirements and associated compliance timelines
11. Customer feedback and annual public consultation

The 2021 Milton Transit Accessibility Plan feeds directly into business practices as well as annual capital and operating budget recommendations.

Section 6 Process for Managing, Evaluating and Taking Action on Customer Feedback

Customer feedback is important to measure the pulse of the transit system and identify areas for service improvement. The following sections outline the process for receiving, managing, evaluating and taking action on customer feedback.

Receiving Feedback (Customer Generated)

Feedback from customers (positive, negative or neutral) serves as key inputs to Milton Transit's service delivery and annual service plans, including those elements dealing specifically with accessibility.

The Customer Service Information Centre (operated by the transit service provider) receives feedback related to service operations, whereas Town staff receive planning and administration-related feedback for review and response. Corporate response policies outline how customer feedback is retained and responded to. Customers and residents can provide comments in a number of formats, including: telephone, in person, mail, email, website and social media accounts (Facebook and Twitter). In all cases, when a customer has made an inquiry or requested a response, Milton Transit staff replies to the customer in the same format the inquiry was received.

Upon receipt, staff forward service requests to the appropriate area for review and response. In the event that a request can be acted upon outside of the service planning process, appropriate action is taken and the customer is advised accordingly.

The service provider completes all investigations and actions on recorded complaints, as appropriate. Customers who request a response to a complaint are advised of the investigation and response timelines for actions. Categorization of complaints received support trend analysis and whether new programs, policies and services require further examination.

The contracted operations supervisor (or designated) acknowledges all compliments received about Milton Transit service delivery employees in the form of an open memo or letter for the quality customer service they have provided.

Gathering Feedback (Milton Transit Generated)

Milton Transit uses a number of methods to gather feedback from customers, including:

- Online feedback engagement tool - Let's Talk Milton - as required
- Online surveys via Milton Transit web page - as required
- On-board surveys - as required
- Town committees - as required
- Peer consultations - ongoing
- Service Plan development and process - annually
- Service Reviews - as required
- Transit Master Plan development and process - approx. every five (5) years

All information collected assist in making recommendations and adjustments for service improvements.

Section 7 Process for Estimating Demand for Specialized Transportation Services

The process to identify service demand requirements for specialized transit services includes an analysis of factors and influences which can vary over time. These factors include:

- Historic ridership trends and growth analysis on both conventional and specialized transit services.
- Eligibility criteria for specialized services, noting given requirements under IASR 191/11 involving transition to categories of eligibility in 2017.
- Accessibility levels of conventional transit services, including: accessible bus/service availability and associated stops and amenities. This factor also depends on the extent to which specialized transit customers can use accessible conventional service when possible, as well as the level of service connectivity that exists between conventional and specialized services.
- The location of key origins and destinations within the Milton Transit service area and their proximity to one another, including the Milton GO Station, older adult homes, medical facilities, rehabilitation facilities, medical offices, Milton District Hospital and major retail areas (primary origins and destinations for specialized transit customers).
- Local demographics and trends.
- Anticipated changes to local policies and procedures.

Further analysis of ridership and demand forecasting provides input into the annual budget process. It is important to note that at any point in time, the impact level of these factors vary, and as such, determining demand for specialized services is an ongoing exercise.

Section 8 Steps to Reduce Wait Times for Specialized Transportation Services

Specialized transit customers consistently identify on time performance as a high priority. As such, Milton Transit retains a dedicated service contractor that provides on demand taxi services (within established time parameters) as well as Town-owned dedicated bus services, which include same day service. However, there are a number of factors that impact service wait times. These factors include, but are not limited to:

- Traffic conditions caused by weather conditions, road construction, train crossings, etc.
- Site issues from drop-off locations (e.g. automobiles parked in designated drop-off locations)
- Customers not ready for their pick-up in their pick-up window
- Late cancellations and no shows (e.g. customers who do not take their scheduled trip and do not cancel in advance triggers the service provider to wait an additional five (5) minute past a scheduled reservation (policy driven), which may impact future consecutive trips)

A contracted centralized reservationist approved and implemented in 2014 has provided further control and monitoring of scheduled trips, with emphasis on addressing trip no shows and other procedural obligations to minimize customer wait times. Additionally, the implementation of scheduling/dispatching software has provided further information to assist in improving scheduling and subsequent operations, with the ability to measure system performance. Further service delivery adjustments planned in 2020 will continue to address on time performance, using Town-owned, dedicated specialized transit vehicles.

Section 9 Procedures to Address Equipment Failures

Conventional Transit Services

Conventional transit fleet requirements are determined based on the number of buses required during peak operating periods, including buses that require inspections and maintenance - referred to as spare fleet ratio. This ratio can vary significantly given factors of age and make/model of the fleet noting that while older buses may require higher levels of maintenance to keep them operating efficiently, newer buses tend to have more electronic-related failures.

There are a number of actions taken to mitigate in-service breakdowns, including the following:

- Operators submit daily bus defect reports to maintenance staff at the end of service day for follow-up prior to bus redeployment.
- Every evening when buses are serviced (refueled, farebox emptied, etc.), employees review typical operational components. In the event that an issue is discovered/identified, technicians complete the repair immediately, or remove the affected bus from next day service (for future maintenance).
- Each day, prior to a bus pull out from the garage, operators complete a pre-trip inspection and circle check, ensuring that the bus is functioning properly. This check includes various accessibility features on the bus (i.e. ramp, kneeling feature, mobility securement equipment, etc.). If there are any non-functioning equipment, operators will attempt to have the issue repaired prior to entering service. A replacement bus is assigned for occurrences when repairs cannot be complete in time.

While these actions mitigate in-service breakdowns, they do not eliminate them. When a bus defect disables the bus while in service, Milton Transit initiates the following procedures:

- Bus operator contacts dispatch and relays the defect information.
- Dispatch determines the extent of the defect and identifies a change-off location and estimated time.
- In consultation with maintenance staff, dispatch arranges for a replacement bus.

These procedures can be impacted by severe weather events or other vehicle issues that could result in the inability to replace all affected buses (e.g. severe weather conditions affecting the functionality of the bus ramp or kneeling features).

Specialized Transit Services

In accordance with municipal By-Law 94-2004 as amended, as well as the established demand responsive contract with the current specialized transit service provider, any accessible vehicle that incurs breakdown must be repaired as soon as practicable. Additionally, the service provider is required to request an accessible vehicle from another broker to accommodate the trip.