

# Appendix A

## Scoping Comments and Responses



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## Acronyms

AA.....	Alternatives Analysis
BRT.....	Bus Rapid Transit
CEQ.....	Council on Environmental Quality
EIS.....	Environmental Impact Statement
FTA.....	Federal Transit Administration
GBNRTC.....	Greater Buffalo Niagara Regional Transportation Council
LPA.....	Locally Preferred Alternative
LRT.....	Light-Rail Transit
NEPA.....	National Environmental Policy Act
NFTA.....	Niagara Frontier Transportation Authority
SEQR.....	State Environmental Quality Review Act
UB.....	University at Buffalo





# Appendix A. Scoping Comments and Responses

The Federal Transit Administration (FTA) and the Niagara Frontier Transit Metro System, Inc. (Metro) received 82 comment submissions during the public scoping comment period for the Buffalo-Amherst-Tonawanda Corridor Transit Expansion Project (Project). The public was provided opportunities to submit comments in several ways throughout the comment period, which extended from August 31, 2021 to October 14, 2021. Written comments could be submitted via email, the project website and/or mail, and verbal testimony was accepted during the virtual scoping meetings held for the Project. Comments were received from government and regulatory agencies, advocacy organizations, residents, and other associations.

Metro and the FTA have considered the comments received on the Project. The Responses to Public/Agency Comments section (section A.1) of this appendix contains summaries of the substantive comments received from the public and agencies and responses to those comments. Comments are organized by subject matter. When more than one commenter provided a similar comment, these comments were grouped and addressed together. This section also includes a table listing the commenters and the comment/response numbers associated with the submitted comments.

The Public/Agency Comments section (section A.2) of this appendix contains the written comments received from the public and agencies as well as the oral comments provided during the scoping meetings. For additional information regarding public involvement, refer to Section 7 of this Scoping Report.

Table A-1 lists the organizations and individuals that commented during the Scoping period and the corresponding comment themes. Three comments were submitted anonymously.

Table A-1 Scoping Comment Themes

Name	Date Received	Submission Method	Comment Theme/Category
Akono, Jomo	9/15/2021	Public Meeting	Support for Light Rail Transit Alternative, Environmental Impacts
Amherst, Town of	10/20/21	Letter	Transportation and Safety Impacts, Environmental Impacts, Public Outreach Concerns
Anonymous	9/2/2021	Crowdsourcing Map	Opposition
Anonymous	9/2/2021	Crowdsourcing Map	Opposition to Portion of Project, Funding
Anonymous	9/2/2021	Crowdsourcing Map	Public Outreach Concerns
Audubon Association	10/8/2021	Letter	Opposition to Portion of Project, Support for Portion of Project
Barton, Ann	9/15/2021	Website	Opposition, Environmental Impacts, Funding
Basinski, Phil	9/15/2021	Public Meeting	Opposition, Environmental Impacts, Transportation and Safety Impacts
Brown, Nicole	9/15/2021	Public Meeting	Support
Cadzow, Dan	9/7/2021	Email and Website	Support for Light Rail Transit Alternative
Cadzow, Dan	9/7/2021	Crowdsourcing Map	Specific Design Concepts
Cadzow, Dan	9/7/2021	Crowdsourcing Map	Specific Design Concepts
Chazen, Jennifer	10/12/2021	Website	Support for Light Rail Transit Alternative
Citizens for Regional Transit	10/14/2021	Letter	Support for Light Rail Transit Alternative
Colbert, Gloria	10/12/2021	Email	Opposition to Portion of Project, Environmental Impacts, Funding
Cross, Colum	9/15/2021	Public Meeting	Support for Light Rail Transit Alternative
Czaja, Donna	10/13/2021	Website	Support for Light Rail Transit Alternative
Darowz, Danielle	9/15/2021	Public Meeting	Opposition, Environmental Impacts, Transportation and Safety Impacts
DiFranco, Ryan	9/20/2021	Email	Support for Light Rail Transit Alternative
DiFranco, Ryan	9/24/2021	Email	Support for Extensions, Other Alignments or Improved Public Transportation
Doherty, Róisín	9/15/2021	Public Meeting	Support for Light Rail Transit Alternative
Erie County	10/14/2021	Letter	Environmental Impacts, Transportation and Safety Impacts
Fibich, Edward	9/15/2021	Email	Support
Fischer, Liam	10/7/2021	Website	Support
Funke, Doug	9/15/2021	Public Meeting	Support for Light Rail Transit Alternative
Giles, Elizabeth	9/15/2021	Public Meeting	Support for Light Rail Transit Alternative
Gordon, James	9/15/2021	Public Meeting	Support for Extensions, Other Alignments or Improved Public Transportation

Name	Date Received	Submission Method	Comment Theme/Category
Gordon, James	10/14/2021	Email	Support for Light Rail Transit Alternative, Support for Extensions, Other Alignments or Improved Public Transportation
Greene, Lauren	9/13/2021	Website	Opposition, Environmental Impacts
Grek, David	9/15/2021	Public Meeting	Opposition, Environmental Impacts, Transportation and Safety Impacts
Heath, Christina	9/29/2021	Website	Opposition, Environmental Impacts, Transportation and Safety Impacts
Ho	10/1/2021	Website	Support for Light Rail Transit Alternative
Horbowicz, Denise	9/15/2021	Public Meeting	Opposition, Environmental Impacts, Transportation and Safety Impacts
Horbowicz, Jeff	9/15/2021	Public Meeting	Opposition, Environmental Impacts, Transportation and Safety Impacts
Hurst, Jackson	9/28/2021	Email	Public Outreach Concerns
Husted, Simon	9/15/2021	Public Meeting	Support for Light Rail Transit Alternative
James, Anthony	10/14/2021	Website	Support for Light Rail Transit Alternative
Jankowski, Janiece	10/13/2021	Website	Support for Light Rail Transit Alternative
Kacprzak, Paul	10/14/2021	Website	Support for Light Rail Transit Alternative
Kalayci,	10/14/2021	Website	Support for Light Rail Transit Alternative
Klein, Christopher	10/13/2021	Email	Support for Extensions, Other Alignments or Improved Public Transportation, Funding
Konovitz, Cindy	9/7/2021	Email	Public Outreach Concerns
Kragbe, Marilyn	9/13/2021	Telephone	Support for Light Rail Transit Alternative
L, Dan	9/15/2021	Email	Opposition, Environmental Impacts, Funding
Lane, Joseph	9/15/2021	Public Meeting	Support for Bus Rapid Transit Alternative, Environmental Impacts
Lanham, Donna	9/21/2021	Email	Transportation and Safety Impacts, Public Outreach Concerns, Environmental Impacts
Lee, Jesse	9/13/2021	Email	Opposition
Licata, Domenic	9/28/2021	Website	Support for Light Rail Transit Alternative
Louis, Jim	9/15/2021	Public Meeting	Support
Mercurio, Scott	10/1/2021	Crowdsource Map	Support for Light Rail Transit Alternative, Support for Extensions, Other Alignments or Improved Public Transportation
Mrozinski, Kathleen	9/15/2021	Email	Support for Extensions, Other Alignments or Improved Public Transportation
Mullen, Lawrence	9/16/2021	Email	Support for Light Rail Transit Alternative
Nolan, Daniel	9/15/2021	Email	Support for Extensions, Other Alignments or Improved Public Transportation
Nolan, Daniel	9/15/2021	Email	Support for Extensions, Other Alignments or Improved Public Transportation
Nolan, Daniel	9/15/2021	Email	Support for Extensions, Other Alignments or Improved Public Transportation

Name	Date Received	Submission Method	Comment Theme/Category
O'Neil, Gina	9/15/2021	Telephone	Support for Bus Rapid Transit Alternative, Support for Extensions, Other Alignments or Improved Public Transportation
Palka, Amelia	9/22/2021	Email	Support for Light Rail Transit Alternative, Support for Extensions, Other Alignments or Improved Public Transportation, Specific Design Concepts
Palka, Dusan	9/22/2021	Email	Support
Pawlik, Benjamin	9/29/2021	Crowdsourcing Map	Specific Design Concepts
Pawlik, Benjamin	9/29/2021	Crowdsourcing Map	Specific Design Concepts
Pawlik, Benjamin	9/29/2021	Crowdsourcing Map	Support for Light Rail Transit Alternative
Pawlik, Benjamin	9/29/2021	Crowdsourcing Map	Operations
Pawlik, Benjamin	9/29/2021	Crowdsourcing Map	Support for Light Rail Transit Alternative
Peissinger, Karen	9/15/2021	Public Meeting	Support for Bus Rapid Transit Alternative
Perez, Anthony	9/27/2021	Website	Opposition to Portion of Project, Environmental Impacts
Peterson, Lorna	9/20/2021	Email	Support for Bus Rapid Transit Alternative
Roberts, Laura	9/13/2021	Email	Support, Environmental Impacts
Russin, Maria	10/14/2021	Website	Support for Bus Rapid Transit Alternative
Sainsbury, Kathleen	9/13/2021	Email	Support for Extensions, Other Alignments or Improved Public Transportation
Schober, Robert	9/15/2021	Public Meeting	Specific Design Concepts, Environmental Impacts, Transportation and Safety Impacts
Slater, Sean	10/14/2021	Website	Support for Light Rail Transit Alternative, Support for Extensions, Other Alignments or Improved Public Transportation
Steinberg, Stephen	9/15/2021	Public Meeting	Opposition, Environmental Impacts
Stout, David	9/14/2021	Email	Public Outreach Concerns
Stout, David	9/15/2021	Email	Public Outreach Concerns
Taylor, Karen	9/15/2021	Email	Opposition to Portion of Project, Environmental Impacts
Taylor, Karen	9/15/2021	Public Meeting	Opposition to Portion of Project, Environmental Impacts, Funding
University at Buffalo	9/20/2021	Letter	Support for Light Rail Transit Alternative
Van Oss, Tim	10/14/2021	Website	Support for Light Rail Transit Alternative, Support for Extensions, Other Alignments or Improved Public Transportation
Vinal, Jeanne	9/15/2021	Public Meeting	Support for Extensions, Other Alignments or Improved Public Transportation, Funding
Williams, Debby	9/13/2021	Email	Opposition, Environmental Impacts, Transportation and Safety Impacts
Wujek, Tom	9/15/2021	Email	Support for Light Rail Transit Alternative, Support for Extensions, Other Alignments or Improved Public Transportation, Specific Design Concepts
Ziaja, Maria	10/14/2021	Website	Support for Light Rail Transit Alternative

## A.1 RESPONSES TO PUBLIC AND AGENCY COMMENTS

### A.1.1 Support for Metro Transit Expansion Project, LRT Build Alternative, or BRT Build Alternative

Summary of Comments: Commenters expressed support for the Project. Beyond the broad and general support for the Project, the LRT Alternative, and the BRT Alternative, many of the comments noted various potential benefits of the Project, including:

- Transit-oriented development opportunities
- Reduction in exhaust and carbon emissions from personal automobiles
- Fuel and cost savings of using transit and biking or walking to transit
- Linking of University at Buffalo campuses to Downtown Buffalo
- Improved accessibility including to jobs and appointments
- Supporting economic growth and re-urbanization

Summary of Comments: Commenters, including the University at Buffalo and Citizens for Regional Transit, expressed support for the LRT Build Alternative. Reasons for this preference included:

- Extension of an existing system that builds on associated investments
- Ease and consistency of user experience
- One-seat ride linking campuses to Downtown Buffalo
- One-seat ride for seniors and people with disabilities
- Greater carrying capacity of vehicles and speed compared to BRT
- Less pollution and exhaust compared to BRT
- Smoother, less bumpy ride compared to BRT
- Longer lifespan of vehicles compared to BRT
- Avoids potential for “BRT creep” wherein service can be degraded to the point where it is on par with regular bus service
- In line with results of years of public outreach and the outcome of the Alternatives Analysis

Summary of Comments: Commenters expressed support for the BRT Build Alternative. Reasons for this preference included:

- Better suited to suburban character of area compared to LRT
- Less costly than LRT
- Less new infrastructure required compared to LRT
- Capacity of vehicles better matches levels of ridership in suburban areas compared to LRT
- Shorter construction period compared to LRT
- Reduced noise and vibration impacts compared to LRT
- Potentially greater political support compared to LRT
- Greater flexibility compared to LRT may make it less reliant on UB for ridership

RESPONSE: The Project has been identified for many of the reasons stated above. As stated in Section 3 of the Scoping Report, the primary purpose of the Project is to provide a fast, reliable, safe, and convenient transit ride and link established and emerging activity centers along the existing Metro Rail line in Buffalo with existing and emerging activity centers in the towns of Amherst and Tonawanda. The Project would serve existing Metro riders, attract new transit patrons, improve regional connections between Buffalo, Amherst, and Tonawanda, and support redevelopment and other economic development opportunities. Additionally, the Project would improve livability by increasing mobility and accessibility in communities throughout the region.

The need for enhanced, equitable and sustainable transit service has three main components; (1) to serve existing and future travel demand generated by recent, pending, and future regional development; (2) to provide high-quality regional transit service; and (3) to better serve transit-dependent population segments.

Two build alternatives, a light rail transit (LRT) expansion and a bus rapid transit (BRT) system have been identified for the Project. The Draft EIS will assess the impacts of the proposed build alternatives.

#### A.1.2 Support for Extensions, Other Alignments, or Improved Public Transportation

Summary of Comments: Commenters supported alignments or options not included in the Project and/or suggested alternative routes or configurations. This includes preference for:

- Tunnel alternatives for all or part of the alignment
- Support for expanded bus service
- Support for alignments or options not included in the Project
- Different termini including Crosspointe Business Park
- Other alignments/configurations, including service to the Southtowns, the Albright-Knox Art Gallery, Buffalo Museum of Science, Buffalo Niagara International Airport, Walden Galleria, Williamsville, and the City of Niagara Falls.

RESPONSE: As described in Section 4 of the Final Scoping Report, the Project was identified through an iterative process that included stakeholder feedback. Metro and the Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) initiated the Amherst-Buffalo Alternatives Analysis (AA) in fall 2012. The overall goal of the Amherst-Buffalo AA was to evaluate a range of high-quality transit service alternatives to improve transit access between key activity centers in Buffalo and Amherst, provide enough information to support the recommendation of a Locally Preferred Alternative (LPA), and enable GBNRTC to adopt the LPA as part of the fiscally constrained portion of the long-range transportation plan.

The Amherst Buffalo AA involved a three-tiered approach that established screening methodology and selection criteria. A Project Steering Committee, Project Advisory Committee, and a robust Public Participation Plan were established to help guide the study. Community stakeholders also provided

input and feedback. During the study, four public information meetings were held as well as over 75 staff-level meetings and presentations to community organizations and stakeholders.

After reviewing the technical results of the Amherst Buffalo AA and considering feedback from the Project Steering and Advisory Committees and the public, Metro recommended the Niagara Falls Boulevard LRT Alternative as the strongest alternative to advance as the LPA. The LPA was generally defined as extending LRT from the existing Metro Rail terminus at University Station, extending underground along Bailey Avenue to a tunnel portal on Eggert Road, continuing at grade on Niagara Falls Boulevard to Maple Road to Sweet Home Road, onto and through UB North Campus to Audubon Parkway, and terminating near the I 990 interchange.

Following the Amherst Buffalo AA and the adoption of the original LPA in the fiscally constrained Transportation Improvement Program, Metro agreed to a request from stakeholders to study the feasibility of exiting University Station directly to Niagara Falls Boulevard, via Kenmore Avenue, rather than running beneath Bailey Avenue. Under this option, the alignment would travel from University Station underground along Kenmore Avenue and onto Niagara Falls Boulevard where it would surface through a portal just north of Kenilworth Avenue and continue along Niagara Falls Boulevard to a common point at the intersection of Eggert Road and Niagara Falls Boulevard. From here, the alignment would follow the original LPA to the interchange of I 990 and Audubon Parkway.

The evaluation identified that this refined LPA could save approximately \$200 million (in 2014 dollars) in construction costs by reducing the tunnel length from 10,000 linear feet to only 3,400 linear feet. The refined LPA would also eliminate a costly underground station. Another evaluation factor was travel times, which would be just under 21 minutes from I 990 to University Station for the refined LPA and just under 22 minutes for the original LPA. Even though the travel times are comparable, the refined LPA would have fewer impacts to existing parcels. During meetings with the Technical Advisory Committee and Steering Committee, the consensus was to move forward with the environmental review of the refined LPA under the State Environmental Quality Review Act (SEQR) and to eliminate the Bailey Avenue portion of the alignment. This was reviewed by the NFTA Board of Commissioners and with the general public during a meeting held on December 6, 2018.

Since the release of the SEQR Draft Environmental Impact Statement (EIS) in 2020 and the designation of FTA as the Lead Federal Agency for the Project's environmental review process being conducted in accordance with the National Environmental Policy Act (NEPA), the FTA has requested a second build alternative, a BRT system, be evaluated in addition to the locally preferred LRT Build Alternative. The BRT Build Alternative would follow essentially the same alignment as the LRT Build Alternative.

The focus of the NEPA Draft EIS will be the Buffalo-Amherst-Tonawanda corridor for both the LRT and BRT build alternatives. The Buffalo-Amherst-Tonawanda corridor is the highest priority for transit expansion due to higher existing and potential future transit ridership, a larger concentration of population and employment, more opportunity for future development and the



ability to connect three of the region's major economic development engines, University at Buffalo, the Buffalo Niagara Medical Campus and downtown Buffalo. Planning for additional corridors identified as having potential for high quality transit expansion may be considered in the future, as a separate effort.

### A.1.3 Opposition to the Metro Transit Expansion Project

Summary of Comments: Commenters expressed opposition to the Project. Reasons for this position included:

- The Project is not needed or justified
- The Project will create traffic congestion and increase travel times
- The Project will damage the community character and neighborhoods
- The Project will have noise and vibration impacts
- The Project will impact visual and natural resources
- The Project will impact community facilities and utilities including emergency services
- The Project will result in impacts from construction
- The Project will create safety concerns along the corridor
- Technological advances have eroded or supplanted the environmental benefits offered by the Project

Summary of Comments: Other commenters expressed opposition to only a portion of the Project, between UB North Campus and the I-990, i.e., in the Audubon section of the Town of Amherst. Comments included a letter from the Audubon Homeowners' Association (HOA) citing the results of a member survey that received 99 responses. Among respondents of the HOA survey, 70% were opposed to the Project. Reasons for this position included:

- The Project is not needed or justified between UB North Campus and I-990
- The Project will damage the Audubon community
- The Project will have noise and vibration impacts on residences in the Audubon community
- The Project will result in impacts from construction on residences in the Audubon community
- Recent changes and investments in local infrastructure on John Jay Audubon Parkway will have to be reversed if the Project is undertaken

RESPONSE: Metro will further compare the impacts, costs, and benefits of the Project in the Draft EIS. Section 6 of the Final Scoping Document outlines the scope of work and methodologies that will be used to identify potential adverse environmental and social impacts resulting from the Project. If any potential significant adverse impacts are identified, appropriate mitigation measures to avoid or reduce these impacts will be proposed.

### A.1.4 Specific Design Concepts

Summary of Comments: Commenters provided input on specific design concepts. Comments covered the following issues:



- Consideration of below-grade or side-running track alignments for specific portions of the Buffalo-Amherst-Tonawanda corridor
- Updated signaling technologies
- Updated transit vehicles
- Additional park-and-rides along the Buffalo-Amherst-Tonawanda corridor

RESPONSE: Assumptions for design elements, including tracks, stations, parking, will be made for the purposes of the environmental analysis. These elements will be further refined during the preliminary and final design. Metro will consider input from the public throughout both the environmental analysis and preliminary and final design.

#### A.1.5 Operations

Summary of Comments: A commenter provided input on operations, requesting an expansion in service hours.

RESPONSE: Operating assumptions will be made for the purposes of the environmental analysis and per the conceptual design efforts. These assumptions will be outlined in the Draft EIS and follow Metro's current operations. Detailed operating plans will be determined during final design. Metro will consider input from the public throughout both the environmental analysis and preliminary and final design.

#### A.1.6 Funding

Summary of Comments: Commenters addressed project costs, cost-effectiveness, and funding for the Project.

RESPONSE: As the Project enters and moves through the FTA's Capital Investment Grants (CIG) New Starts process, Metro along with FTA and other stakeholders will collaborate on the development of a financial plan, refining the project costs, and identifying potential funding strategies.

#### A.1.7 Transportation

Summary of Comments: Comments related to concerns about transportation including

- Public transportation (transit)
- Highways and roadways within the LPA
- Impacts to driveway access and availability of parking spaces
- Safety and security in LPA corridor
- Traffic congestion and increased travel times
- Effects on traffic at specific intersections, on specific roadways or side streets.
- Questions related to the SEQR traffic analysis

RESPONSE: The potential effects on transportation and safety will be assessed and documented in the Draft EIS. The Transportation chapter of the Draft EIS will summarize the roles and functions of the various modes of

transportation in the Buffalo-Amherst-Tonawanda Corridor and describe the potential impacts and mitigation that could result from the project. The chapter will document existing and planned transit and roadway improvements as well as pedestrian and bicycle facilities located along the Project alignment. The effects of the alternatives on all modes of transportation will be evaluated at the local and regional level. The chapter will present potential benefits and impacts during operations and construction of the Build Alternatives (compared with the No Build Alternative). If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

#### A.1.8 Environmental Impacts

Summary of Comments: Commenters addressed the environmental impacts of the Project or sought additional information about environmental impacts. Comments dealing with specific resources or environmental effects are addressed below by topic area, generally following the outline of the Scoping Report.

RESPONSE: The Project is being planned and designed in accordance with all local, state, and federal laws and regulations. These regulations, including NEPA and SEQRA, set out specific criteria for environmental and social impacts and how they are to be avoided and/or mitigated. Respective jurisdictional agencies have been and will continue to be consulted throughout the development of the project.

The potential social, economic, and environmental impacts (beneficial and adverse) that could be expected to occur with the construction and operation of the Project will be evaluated and presented in the Draft EIS. The Draft EIS will summarize these impacts, while providing further detail within the associated technical reports.

#### Property Acquisitions and Displacements

Summary of Comments: Erie County requested the inclusion of an analysis of impacts to businesses resulting from property acquisitions.

RESPONSE: The Project could require the purchase of property, potentially resulting in displacement of residential, commercial, or industrial uses. Permanent or temporary easements could also be required for the Project right-of-way. Encroachments by businesses or residents (buildings, storage of materials, fences, etc.) and other illegal use of the existing right-of-way could be present along the corridor and would need to be resolved to ensure available rights-of-way for the Project. Additional areas that could require acquisition include station areas, park-and-ride lots, maintenance facilities, and ancillary facilities such as traction power substation locations and signal structures. Individual acquisition parcels will be identified in the context of neighborhoods, community services, and Environmental Justice populations. Potential easements will also be identified.

Procedures and programs related to right-of-way acquisition for the Project will be consistent and in accordance with applicable state rules and regulations and NFTA's updated Real Estate Acquisition Management Plan. Local sources of information will include the Erie County Tax and Property Appraiser database.

## Communities

Summary of Comments: Comments on communities addressed potential negative impacts on neighborhood cohesion, as well as requests for additional information. Some of the reasons cited for negative impacts included changes from a suburban to urban character, property impacts, loss of parking, concerns over the Project's impacts on snow removal, waste disposal, and emergency services operations, and impacts to community cohesion.

RESPONSE: The direct and indirect effects of the Project will be evaluated as part of the Draft EIS. Effects to traffic, land use, social conditions, economic conditions, and other topics will be studied. Section 6 of the Final Scoping Report identifies the key environmental topics of concern for the Project. As stated in Section 6, the Draft EIS will evaluate the Project's conformance with the character of the surrounding study area. This analysis will identify the defining features of the study area, assess how these major characteristics relate to the area's overall character, and analyze whether the Project could significantly alter the defining features of the community. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

## Visual Resources

Summary of Comments: A commenter expressed concern over the Project contributing to light pollution.

RESPONSE: The visual characteristics of the Project will be evaluated and documented in the Draft EIS. Proposed lighting for the Project stations will be determined during final design.

## Natural Resources

Summary of Comments: A commenter expressed concern over the Project's effects on wildlife in forested areas abutting the Buffalo-Amherst-Tonawanda Transit Expansion corridor.

RESPONSE: The potential effects on natural resources will be assessed and documented in the Draft EIS. The Natural Resources section will evaluate potential effects of the Project to natural resources, which will include the general ecology, flora and fauna, and rare, threatened or endangered species. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

## Noise and Vibration

Summary of Comments: Comments on noise and vibration impacts included concerns over construction, the operation of vehicles, and the use of warning horns by LRT vehicles.

RESPONSE: The potential effects on noise and vibration will be assessed and documented in the Draft EIS. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

## Construction Effects

Summary of Comments: Comments on construction effects included concerns over construction impacts on residential building foundations, noise, access to local businesses, disposal of rubble, the

release of underground gasses into the air and drainage issues, as well as interest in the potential positive impact on local hiring generated by construction.

RESPONSE: The Project would involve physical improvements within the corridor that would result in construction-related impacts. The Draft EIS will address the construction impacts and related mitigation and preventive measures that can be implemented to minimize the negative impacts of construction activities. Corrective measures to reduce potential community disruption will be identified.

#### A.1.9 Public Outreach

Summary of Comments: Commenters addressed aspects of public outreach for the Project. Comments included concern that public input would not be considered, requests for information or clarification, requests that comments made during the SEQR process be more fully addressed and concerns about the timing of public meetings.

RESPONSE: Agency and public coordination are an integral component at all stages of planning and project development, including in this NEPA scoping process. Federal regulations require that projects include a comprehensive public involvement program, and Metro is committed to continuing to provide the public an active role in the planning and development of the Proposed Project. The contemplated public and agency participation efforts for this project are in compliance with NEPA and CEQ regulations implementing NEPA (40 CFR §§ 1500-1508), FTA policies and regulations, including 23 CFR §450.318, Section 4(f) of the Department of Transportation Act of 1966, Section 106 of the National Historic Preservation Act of 1966, and Executive Order 12898.

The findings of the SEQR DEIS, the written and oral comments received during the SEQR public hearing, and comments received during the SEQR DEIS document public comment period that ended on March 24, 2020, will inform the development of a Draft EIS prepared pursuant to NEPA.

Metro continues to expand the public outreach program associated with the Project to share information and gather input on the Project. The broader outreach efforts are summarized in Section 7 of the Final Scoping Document.

## A.2 PUBLIC AND AGENCY COMMENTS

**NFTA - RECORD #979 DETAIL****Submission Date :** 9/15/2021**First Name :** Jomo**Last Name :** Akono

**Submission Content/Notes :** I'd like to thank you for holding the session. I'm a west New York resident for 50 years. I totally believe and I'm dedicated to the idea and the concept of this project being able to provide greater accessibility and options to residents throughout west New York. Not just residents of Buffalo or Amherst or Lockport but for all of those included.

As we realize that this region is growing rapidly. Erie County, City of Buffalo residents have increased. As according to the last Census, many people who are going to school and moving to the region are staying in the area. Many people are used to other options of transportation not just driving cars and being clogged up on streets and expressways and highways. I believe that this project will be safe, economical, energy-saving, and, as stated before, it gives accessibility to different areas of development for growing region. One, it gives access to people to have options in employment being able to choose and have greater opportunities to have jobs in different locations, gives people access to educational opportunities in different parts of this region. It also increases commercial opportunities for those who have businesses throughout all of the regions that we are locating and at the same time not destroying the immediate local impact of those who live in areas as opposed to having higher traffic patterns.

In addition, I am a carpenter. I am a member of the local carpenters union and I believe that the impact of having a local hire is very important. So I would love to know in the comment section how intentional will NFTA be in supporting local professional development that means hiring local and regional workers to increasing and maintaining the professional workforce of those local workers. Also making sure that we have apprentices training. The next generation and also the intentional plan about being diverse as far as business opportunities as well as making sure that hiring is diversified. These things I think are very important. It gives greater accessibility to options in life. For this whole region, I am very proud of this region and I think that it's time for us to move into the 21st century and maintain as much high and dignified quality of life as we can. I believe we have the ability to do better. Thank you Thank you for your comments. Light rail is what I was in support of. Thank you.

**Emails :****Notes :**

**NFTA - RECORD #984 DETAIL**

**Submission Date :** 10/20/2021

**First Name :**

**Last Name :** Town of Amherst

**Submission Content/Notes :** "Thank you for the opportunity to review the Niagara Frontier Transportation Authority's (NFTA) Scoping Information Packet regarding the Metro Rail expansion into Amherst. The Town acknowledges that the following comments are being submitted to the NFTA after the October 14, 2021 deadline but hopes they can be considered while the Scoping process moves forward. The Town has a few general comments regarding the Scoping process as it relates to the Town and its residents in the study area.

- Transportation: As part of this analysis, the Town desires to understand the impact of the Proposed Project on volume and level of service on major streets along the transit corridor (such as Niagara Falls Boulevard and Maple Road) along with the various connector streets in the study area.

- Land Use: The Town assumes this section will also include analysis and changes to zoning, although not specifically mentioned. If not, the Town requests that a zoning analysis be included.

- Communities: Major communities such as Eggertsville and Audubon should continue to be involved and engaged to provide input and describe what quality of life issues should be addressed based on their concerns.

- The Town recently completed a Generic Environmental Impact Statement (GEIS) in the Boulevard Central District (BCD) which generally encompasses the triangular area between Niagara Falls Boulevard, Sheridan Drive and the I-290, an area directly abutting the Proposed Project. This should be considered within the analysis and recommendations as the Proposed Project moves forward. Access to the Town's GEIS information can be found by visiting the Town's website ([www.amherst.ny.us](http://www.amherst.ny.us)) and using the keyword search ""BCD.""

We look forward to the future work towards an EIS by the FTA and NFTA for expanded and enhanced transit into Amherst. Please contact me or the Planning Director, Dan Howard, via email or telephone at (716) 631-7051 at any time in regards to the Town's continued participation in this important project."

**Emails :**

**Notes :**



Town of Amherst Planning Department

Erie County, New York



Brian J. Kulpa  
Supervisor

Daniel C. Howard, AICP  
Planning Director

Daniel Ulatowski, AICP  
Assistant Planning Director

October 20, 2021

Mr. Jeffery Amplement, Project Manager  
Niagara Frontier Transportation Authority  
181 Ellicott Street Buffalo, NY 14203


Dear Mr. Amplement,

Thank you for the opportunity to review the Niagara Frontier Transportation Authority's (NFTA) Scoping Information Packet regarding the Metro Rail expansion into Amherst. The Town acknowledges that the following comments are being submitted to the NFTA after the October 14, 2021 deadline but hopes they can be considered while the Scoping process moves forward. The Town has a few general comments regarding the Scoping process as it relates to the Town and its residents in the study area.

- Transportation: As part of this analysis, the Town desires to understand the impact of the Proposed Project on volume and level of service on major streets along the transit corridor (such as Niagara Falls Boulevard and Maple Road) along with the various connector streets in the study area.
- Land Use: The Town assumes this section will also include analysis and changes to zoning, although not specifically mentioned. If not, the Town requests that a zoning analysis be included.
- Communities: Major communities such as Eggertsville and Audubon should continue to be involved and engaged to provide input and describe what quality of life issues should be addressed based on their concerns.
- The Town recently completed a Generic Environmental Impact Statement (GEIS) in the Boulevard Central District (BCD) which generally encompasses the triangular area between Niagara Falls Boulevard, Sheridan Drive and the I-290, an area directly abutting the Proposed Project. This should be considered within the analysis and recommendations as the Proposed Project moves forward. Access to the Town's GEIS information can be found by visiting the Town's website ([www.amherst.ny.us](http://www.amherst.ny.us)) and using the keyword search "BCD."

We look forward to the future work towards an EIS by the FTA and NFTA for expanded and enhanced transit into Amherst. Please contact me or the Planning Director, Dan Howard, via email or telephone at (716) 631-7051 at any time in regards to the Town's continued participation in this important project.

Best Regards,

  
Kimberly Amplement  
Planner



**NFTA - RECORD #901 DETAIL****Submission Date :** 9/2/2021**First Name :****Last Name :** Anonymous

**Submission Content/Notes :** I have seen that they claim this is to enhance the growth of businesses in the area. If the metro increases business, why does Main St. in the City of Buffalo, have so many empty and boarded up buildings. People do not just go to where the train goes, they go to desired areas. Adding the METRO here isn't going to magically help what is left of a dying mall and other retail.

**Emails :****Notes :**

**NFTA - RECORD #902 DETAIL****Submission Date :** 9/2/2021**First Name :****Last Name :** Anonymous

**Submission Content/Notes :** Millions of dollars were just spent to replace the bridge and install a roundabout here. How is the train going to get thru this intersection? It is going to have to be ripped up and reconstructed yet again, all at taxpayer expense, for very few if any destinations to the north. If there were truly that much north of this location, the 2 lanes in each direction would have been maintained, not eliminated.

**Emails :****Notes :**

**NFTA - RECORD #903 DETAIL**

**Submission Date :** 9/2/2021

**First Name :**

**Last Name :** Anonymous

**Submission Content/Notes :** The responses to the original comments sum it up well "NFTA have considered these concerns, but after comparing the impacts, costs, and benefits of the alternatives, NFTA has decided that the benefits of the Proposed Action outweigh the impacts and costs" In other words, they don't care what we have to say because they want this. Nothing is going to change their mind.

**Emails :**

**Notes :**

**NFTA - RECORD #956 DETAIL****Submission Date :** 10/8/2021**First Name :****Last Name :** Audubon Association

**Submission Content/Notes :** "The NFTA's proposed transit corridor includes JJ Audubon Parkway between N. Forest Road and Dodge Road. This section of the corridor runs through the Audubon New Community (Audubon), which is comprised of 1,036 residential units including private homes, townhomes, rental apartments, subsidized senior/disabled apartments and private businesses. The broader community is managed under the Audubon Home Owners Association (Audubon Association) which has 455 fee-paying members. In order to provide timely feedback on the NFTA's three proposed options, the elected Board of Directors for the Audubon Association conducted a survey with a paper copy mailed to all 455 members, and an electronic version posted on the HOA's website. A copy of the survey document is attached.

Our members were given the three options under consideration by the NFTA with key advantages and disadvantages presented for each option:

Option A. No Rapid Transit project.

Option B. Light Rail system.

Option C. Rapid Bus system.

The survey was open for nearly two weeks with an October 4th deadline to give the HOA time to submit a response within the NFTA's deadline for public comment. We included a final response received through the mail on October 5th.

A total of 99 members responded, a 22 % response rate. Responses spanned all areas of the community including: Walton Woods streets, the length of Robin Road, Little Robin Road, Bryant Woods and North Forest area businesses. The results in chart and raw data form are as follows:

The data show that 70% of respondents want No Transit Project (Option A) and would instead like to expand existing bus services into the community, with another nearly 20% choosing Rapid Bus (Option C) as their first choice among the two transit project options. Nearly 70% chose the Rapid Bus (Option C) as their second choice. The Light Rail (Option B) came in last as a first or second choice. Response rates dropped off somewhat for 2nd and 3rd choices respectively, with some members deciding to not complete the forced choice process.

Beyond the member responses shown here, on behalf of our community and particularly the members of the Walton Woods neighborhood directly bordering the proposed project, the Audubon Board of Directors supports the NFTA option that demonstrates the lowest level of negative impacts (e.g., noise and vibration) on the members of our Home Owners Association. We look forward to the upcoming Environmental Impact Statements for each transit project option and to the opportunity to engage with the NFTA during the next Public Comment period."

**Emails :****Notes :****Attachments :** Audubon Association\_Email\_10-8-2021.pdf (1 mb)

## Jeffery Amplement

---

**From:** Audubon Association <office@audubonhoa.com>  
**Sent:** Friday, October 8, 2021 2:30 PM  
**To:** transit expansion  
**Subject:** Audubon Association Comment on Transit Expansion  
**Attachments:** Audubon HOA public comment to NFTA signed.pdf; Audubon NFTA Survey 9.2021.pdf

Good Afternoon,

Attached please find a letter from the Audubon Association regarding the Metro Transit Expansion. A hard copy was also mailed today.

Regards,

**Ashley L Kinney**  
Association Manager  
Audubon Association  
700 Robin Rd.  
Amherst, NY 14228  
Phone - 716-688-1632  
Fax - 716-688-1637

The information contained in this email is intended only for the use of the person or entity to whom it is addressed and may contain information that is confidential and exempt from disclosure under applicable laws. If you read this message and are not the addressee, you are notified that use, dissemination and reproduction of this message is prohibited. If you have received this message in error, please notify the sender immediately and delete this message from your system.

Metro Transit Expansion Project  
Niagara Frontier Transportation Authority  
181 Ellicott Street  
Buffalo, New York 14203

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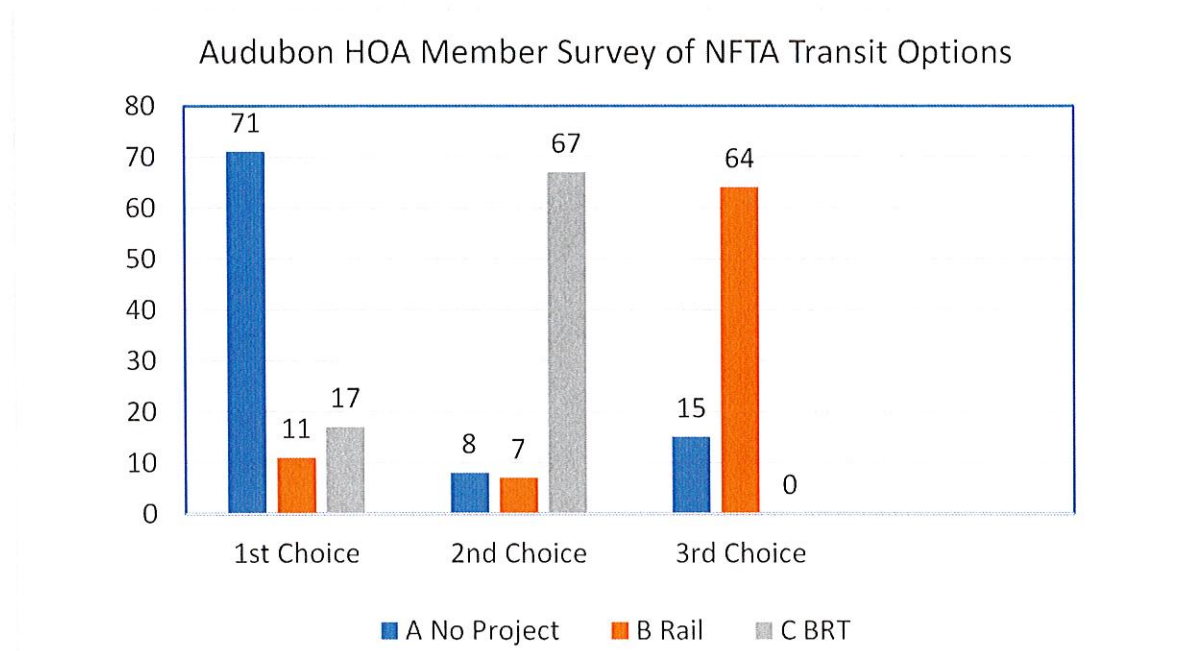
Option A. No Rapid Transit project.

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Option C. Rapid Bus system.

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A total of 99 members responded, a 22 % response rate. Responses spanned all areas of the community including: Walton Woods streets, the length of Robin Road, Little Robin Road, Bryant Woods and North Forest area businesses. The results in chart and raw data form are as follows:



	<b>1<sup>st</sup> Choice</b>		
Option	A No	B Rail	C Bus
Responses	71	11	17
Total		n = 99	

	<b>2<sup>nd</sup> Choice</b>		
A No	B Rail	C Bus	
8	7	67	
	n = 82		

	<b>3<sup>rd</sup> Choice</b>		
A No	B Rail	C Bus	
15	64	0	
	n = 79		

The data show that 70% of respondents want No Transit Project (Option A) and would instead like to expand existing bus services into the community, with another nearly 20% choosing Rapid Bus (Option C) as their first choice among the two transit project options. Nearly 70% chose the Rapid Bus (Option C) as their second choice. The Light Rail (Option B) came in last as a first or second choice. Response rates dropped off somewhat for 2<sup>nd</sup> and 3<sup>rd</sup> choices respectively, with some members deciding to not complete the forced choice process.

Beyond the member responses shown here, on behalf of our community and particularly the members of the Walton Woods neighborhood directly bordering the proposed project, the Audubon Board of Directors supports the NFTA option that demonstrates the lowest level of negative impacts (e.g., noise and vibration) on the members of our Home Owners Association.

We look forward to the upcoming Environmental Impact Statements for each transit project option and to the opportunity to engage with the NFTA during the next Public Comment period.

Sincerely,



On behalf of the Board of Directors  
Audubon Association  
700 Robin Road  
Amherst, New York 14228



## ATTENTION AUDUBON RESIDENTS, WE NEED YOUR FEEDBACK!!!

Audubon Resident's Opinion about NFTA Service Extension Options

**Time sensitive:** Please **return by October 4<sup>th</sup>** to be counted.

The NFTA is looking at options for extending transportation services to Tonawanda/Amherst. We are asking Audubon HOA members to rank order your preferences (1, 2 & 3) for the three options being considered with #1 being your favorite.

Please reply with your name and address through our Facebook page; or via email: [office@audubonhoa.com](mailto:office@audubonhoa.com); or via telephone message: 688-1632 or by return a print-out of this sheet to the Audubon Office drop box (700 Robin Rd) or mail to Audubon Association PO Box 620 Getzville, NY 14068.

#\_\_\_\_ **Option A. Do Nothing:** No extension of the current MetroRail line. Consider using some project funds to expand standard bus services to Amherst Town Center (Police/Court/Library/Senior Center), into the Audubon Community, and out to other Amherst/Tonawanda areas currently unserved by NFTA.

Option A is lowest cost. It eliminates the projected negative noise and vibration impacts for Audubon residents from the proposed MetroRail extension. Option A could immediately increase access to NFTA network throughout our community, which is currently only reached at open bus stops on Millersport Highway.

**Options B & C both share the following characteristics:** Build a new dedicated rapid transit system from UB South Campus, up Niagara Falls Blvd, across Maple Road, through UB North campus and up JJ Audubon Parkway to a Park & Ride Lot north of I-990. The northbound Audubon lanes along Walton Woods are the right-of-way, with train/bus service running from about 6am to 11pm, seven days per week. Beyond UB North Campus there will be two Stations: one at Amherst Town Center and one North of I-990 to include a Storage & Maintenance facility. To access train/bus Audubon residents must walk/drive to I-990 Station to Town Center Station on Audubon Parkway.

#\_\_\_\_ **Option B. Extend MetroRail Train Tracks:** As NFTA proposed in 2020, extend the Light Rail train tracks from UB South through UB North and up JJ Audubon Parkway along Walton Woods to I-990 Park & Ride.

Option B is highest cost involving two tunnels, rail bed and traffic controls, and longest timeframe (8 – 10 years). Main benefits are large capacity trains and Metro riders could travel all the way from I-990 Park-and-Ride station to Downtown without transferring between train and surface bus. The main negatives noted in NFTA's 2020 study is that the passing trains -- under IDEAL operating conditions -- will generate moderate to severe noise and moderate to severe vibration in the Walton Woods neighborhood, every six minutes (first north then south on 12 minute routes) during the hours of operation (6am to 11pm, 7 days/week). Noise and vibration impacts will likely increase as trains/tracks wear into less-than-IDEAL operating conditions.

#\_\_\_\_ **Option C. Create Rapid Bus Dedicated Lane:** The DOT returned the NFTA's 2020 Option B only proposal, suggesting NFTA also consider Bus Rapid Transit as Option C. The Rapid Bus would extend service by building a dedicated surface lane and traffic control for following the same path proposed for the MetroRail trains.

Option C is a middle cost. It still requires creating the dedicated paved lane and traffic controls, but eliminates tunnels and fixed rail tracks. Option C will require less time (4 – 5 years) and offer more flexibility in capacity and shorter wait time between vehicles. It will reduce the negative impacts from noise and vibration on surrounding neighborhoods including Walton Woods. It will still require transfer between train and bus at South Campus.

Additional details on Options B and C will be in an upcoming report addressing costs, benefits and impacts, followed by a Public Hearing to solicit further public comment. Please monitor Audubon HOA's website for updates or go to NFTA's Metro Extension Project website: <https://www.nftametrotransitexpansion.com>. You can also email comments directly to [transitexpansion@nfta.com](mailto:transitexpansion@nfta.com). Direct comments must be submitted **by October 14<sup>th</sup> at 4pm.**

Thank you for taking the time to provide this critical feedback. Audubon Board of Directors.

Name \_\_\_\_\_

Address \_\_\_\_\_



**NFTA - RECORD #908 DETAIL****Submission Date :** 9/15/2021**First Name :** Ann**Last Name :** Barton

**Submission Content/Notes :** I'm against expansion of rail into Amherst. There is no proof that expansion has ridership to support maintaining expansion. Also the cost of changes to infrastructure would be better spent on more buses. There would be a negative affect impact on neighborhoods adjacent to project . Noise and vibration would be a real problem. property values will fall. no one wants to live within hearing distance of the bells and buzzers made by the trains,

**Emails :****Notes :**

**NFTA - RECORD #977 DETAIL****Submission Date :** 9/15/2021**First Name :** Phil**Last Name :** Basinski

**Submission Content/Notes :** I've owned a business on Niagara Falls Boulevard in the affected area since 1989. What's interesting to me, and it touches a bit on what the previous commenter had to say, is the existing traffic on Niagara Falls Boulevard and what is very interesting is the fact that eliminating basically three lanes out of a five-lane major thoroughfare that connects Main Street to the Northtowns is going to be rededicated to a light rail transit or bus rail transit. Whichever way you want to look at it, the issue that we've had at least in previous comments is that either north- or southbound traffic is subject to incredible disruptions due to service vehicles whether it be garbage trucks, school buses, or delivery vehicles during peak times of the day. When people, who aren't convinced that riding rapid transit is going to be the best option, will end up turning that into a parking lot in terms of the slowdown of traffic. Additionally, the previous comments that were made at other meetings, I have not been able to see them addressed or published in any of the subsequent releases of news from the NFTA specifically when the train emerges from underground. I believe, by federal law, it's required to sound a train whistle, which exceeds 120 decibels, which far exceeds the stated limits of what the noise interruptions would be. In addition to that, comments were made about rerouting the entire project underground and specifically the cost of maintenance of an above-ground system versus an underground system and how that may impact the overall cost of the project over a 50-year lifespan. Additionally, there is the issue of traffic that will avoid Niagara Falls Boulevard and redirect down secondary streets through neighborhoods either north- or southbound on the Amherst or Tonawanda side. And the impacts they may have on to the local residents whether they have children playing, waiting for school buses, etc. Another comment about that is the fact that people, who can't necessarily access a park & ride conveniently, are more than likely going to be parking alongside streets near and proximal to Niagara Falls Boulevard. I haven't heard anything addressed again from the NFTA or any of the oversight commissions that specifically have spoken to any of the previous concerns about this. I would like to know where and when they may be released and what the overall cost of the project is going to be over the course of 50 years whether it's light rail, bus rail or underground. Finally, this is very important, it touches on something a previous commenter said and that is the flexibility of this entire project. A fixed-base system like an LRT is going to be with us for a lifetime whether we use it or not.

**Emails :****Notes :**

**NFTA - RECORD #981 DETAIL****Submission Date :** 9/15/2021**First Name :** Nicole**Last Name :** Brown

**Submission Content/Notes :** It has been very interesting to hear the various opinions about the train expansion. I truthfully am for a combination of both. As a person who understands the difficulty of getting around without having a car, for instance. All of my doctor's appointments and all of my doctors are on main bus routes and sometimes those doctors are in the suburbs. So I have a dermatologist that's far past Sheridan. But it's so far out that people wouldn't use the buses and they canceled routes. So a concern of mine is that these options are made truly accessible to everyone.

Also, I think that for people who are concerned about a tax benefit, I know that my job at least (I work for Buffalo public schools), they offer an employee deduction. So when you get a bus pass or any type of parking pass, you put how much a month you need deducted pre-taxes from your wages, from your paycheck and that's given to you. So it's as a person who takes a combination of both and I've had to work jobs really far out which means I need to wake up three hours early to catch that one bus and if I miss that one bus, I'm two hours late. I think that is something to be in consideration especially from Amherst to even West Seneca, Larkinville, which is actually somewhat downtown. So, yes, those are my comments and concerns.

**Emails :****Notes :**

**NFTA - RECORD #904 DETAIL**

**Submission Date :** 9/7/2021  
**First Name :** Dan  
**Last Name :** Cadzow  
**Submission Content/Notes :** NFTA Light Rail Expansion Comment

We want to express our complete and enthusiastic support for the light rail expansion project. Despite owning cars, we have tried to use the busses in the past. The problem was it was kind of confusing. For example, once while taking the Colvin 11 to Tonawanda, the bus just stopped halfway. The driver said he had to wait there of 30 min (how much time it would have taken to complete the route) and then turn around. He told me I could get off and wait 45 min for another bus.... I just walked.

The other problem is every time there is a budgeting problem, routes and schedules are changed. Busses just aren't as dependable and predictable as light rail. As the American Public Transportation Association (APTA) article NFTA recently shared illustrates, areas near entrenched transit (fixed-guideway) have higher value and are more affordable to live (i.e., less need for personal vehicles).

In the 1980's Buffalo built an expensive, mostly underground light rail line that ran the length of Main Street. Due to the difficulties of construction, by the time it began operation many of the businesses along Main St shuttered their doors. Further, resulting subway ridership was less than the busses that previously served Main St. That was the last Buffalo saw of light rail construction.

At the same time, conversely, Portland, Oregon built an affordable, at-grade light rail line connecting downtown to the suburbs, of Hillsboro and Gresham. It was a success, so they continued building. Now they have a multimodal system of light rail, busses, and paths wherein anyone can navigate the entire metropolitan area affordably and without hurting the environment or the health and wellbeing of the communities they travel through. Buffalo needs that and with your help we can have it. We just need to be pointed in the right direction with a well-designed project or two to show us all the best way forward.

Also, please consider including light rail in the Region Central redesign. There are numerous cultural institutions including, the history and art museums, two colleges, the gem of the Olmsted Parks system, as well as shopping districts that should be served by reliable light rail service. Opening these resources to the non-motorized public, especially tourists, can be a key factor in maintaining Buffalo's revitalization.

Sincerely,  
The Cadzow Family

[REDACTED]

**Emails :**

**Notes :**

**NFTA - RECORD #905 DETAIL**

**Submission Date :** 9/7/2021

**First Name :** Dan

**Last Name :** Cadzow

**Submission Content/Notes :** Add a large park-and-ride lot with shade trees and security cameras to encourage commuters to use light rail

**Emails :**

**Notes :**

**NFTA - RECORD #906 DETAIL**

**Submission Date :** 9/7/2021

**First Name :** Dan

**Last Name :** Cadzow

**Submission Content/Notes :** Add a park-and-ride lot with shade trees and security cameras to encourage commuters from the Tonawandas to use light rail

**Emails :**

**Notes :**

**NFTA - RECORD #920 DETAIL****Submission Date :** 10/12/2021**First Name :** Jennifer**Last Name :** Chazen

**Submission Content/Notes :** I am supportive of the single ride solution connecting UB's south with north campus. Transit users who have accessibility issues or physical disabilities are incredibly disadvantaged when having to transfer from Bus/Shuttle to the metro rail and vice versa. Buffalo's weather is severe for 6+ months of the year, making it very difficult to go from one to the other platforms.

**Emails :****Notes :**

**NFTA - RECORD #960 DETAIL**

**Submission Date :** 10/14/2021

**First Name :**

**Last Name :** Citizens for Regional Transit

**Submission Content/Notes :** Citizens for Regional Transit (CRT) is a community-based transit advocacy nonprofit that has worked to promote better public transit in Buffalo-Niagara for over 50 years. We served on the NFTA-Metro advisory committee for this project throughout the alternatives analysis and preliminary environmental assessments and continue to serve on the NFTA-Metro Citizens Advisory Committee that provides inputs to NFTA-Metro project and operational decisions. We submitted detailed comments on NFTA-Metro DEIS on 21 March 2021, which provide recommendations for implementing the proposed Metro Rail extension and comments on the associated environmental analyses. Our website ([www.citizenstransit.org](http://www.citizenstransit.org)) provides additional detail about our work. We look forward to working with the FTA and NFTA-Metro in taking this project to the next level.

**Executive Summary**

We appreciate the FTA's willingness to serve as sponsoring agency for the Metro Transit Expansion and welcome them to the project and to Buffalo. Here's a summary of our comments as they relate to the identified topics:

- The proposed scope of the EIS moving forward. The EIS moving forward should build on work already completed by focusing on the Locally Preferred Alternative, light rail transit (LRT) analyzed in the NFTA-Metro Draft Environmental Impact Statement (DEIS) and previous studies over the last 50 plus years. Expanding this scope to reevaluate Bus Rapid Transit (BRT) will delay progress needlessly, as described below.
- Metro's purpose and need. The NFTA-Metro's purpose and need is reflected in their mission statement: "providing the highest level of safe, clean, affordable, responsive, and reliable public transportation." A fast, integrated LRT network, as the spine of the transit network is key to achieving this purpose and need. High volume corridors that require mode shifts, as selecting BRT for the Amherst extension would, work against this goal, as described below.
- Alternatives to be considered. We disagree that we should go back and restudy BRT. BRT was eliminated from consideration for the Amherst extension for good reason, as described below.
- The environmental benefits and impacts to be evaluated. Buffalo Metro Rail operates on clean electricity from the NY Power Authority's (NYPA) hydro power plant in Niagara Falls. LRT offers the least polluting high capacity solution that builds on prior investments, described below. It offers the cleanest per passenger mile pollution alternative.
- Many other project-related issues and analyses. This project has a long planning history that have led to the latest Locally Preferred Alternative (LPA) and DEIS planning documents. There are many local considerations that have informed the decision making process such as: the unique needs of UB, publicly owned available rail ROWs throughout the planned LRT network, and Buffalo's weather to mention a few. These are described below.

The FTA's requirement to restudy the Bus Rapid Transit (BRT) option is unnecessary. As explained in more detail below, here's why: (1) The NFTA, its consultants, and the community have already spent years selecting, refining, and evaluating the alternatives for this project, a process that included comparison of LRT with BRT along many possible alignments, establishing LRT to be the Locally Preferred Alternative (LPA). (2) Restudying this question will delay the project needlessly, further postponing implementation of desperately needed high- capacity, environmentally clean transit solutions; (3) The BRT alternative was rejected for many good reasons, outlined below; and (4) Selecting BRT fails to leverage the investment already made in building Buffalo's successful, functioning LRT.

1. We already spent many years evaluating project alternatives. The original plan for Buffalo's light rail network was developed in the 1960s and 1970s revisited periodically over the years with the most recent major study completed in 2001 and updated in 2010. Based on these foundational plans, the first in-depth transit expansion evaluation began in for the Amherst extension in 2012. It progressed over the ensuing years and involved



extensive stakeholder input and public outreach, resulting in identification of a LPA and a detailed DEIS. The LPA was refined in 2018, resulting in a modified alignment based on further public input. The new alignment better addressed the needs and concerns of key stakeholders and reduced overall costs. The Greater Niagara Regional Transportation Council (GBNRTC) sponsored and led a parallel Transit Oriented Development (TOD) study that found significant economic benefits along the planned LRT deployment. It has now been 10 years developing this latest plan for the Buffalo Metro LRT extension to Amherst. We don't need to go back and reconsider alternatives that have already been rejected and rejected for good reason!

#### 2. Re-examining BRT will only add further delays

Re-examining BRT will prolong the project needlessly. Buffalo deserves support in moving forward with the LPA selected after years of analyses completed in accordance with state and federal requirements and with extensive public and stakeholder input. We ask the FTA to respect the work already completed and support moving forward with the locally selected solution without delay.

#### 3. BRT Will Not Provide the Needed Capacity and Will Require a Mode Shift in the Middle of Key Transit Corridor

The selection of LRT for the Amherst extension is the only approach that will work effectively on this corridor for the following reasons:

**Capacity.** LRT can handle the UB student load because each train, with a top capacity of 700, can carry hundreds of passengers each trip. Buses can only carry 50 people (100 to 150 people with articulated buses, but these don't work well in snow and are not recommended for Buffalo). In order to carry the number of passengers demanding service between the UB campuses, selection of BRT featuring non-articulated (reduced capacity) buses would require bus departures every 3 to 5 minutes apart. This is not realistic, given the requirement for operation in mixed traffic on Main Street and Kenmore Avenue and high-traffic cross intersections to navigate – intersections like Sheridan Drive that will need many minutes to clear crossing traffic. The inadequacy of bus-based transit for UB is evident every day on the bus system that UB currently operates ("The Stampede"), which regularly experiences bunching and overloading, even on the shorter, more direct Millersport / Grover Cleveland Highway route the Stampede now takes.

**Mode Shift Disruption.** The selection of BRT will require a mode shift in the middle of a critical transit corridor. This will significantly lengthen the travel time from Amherst to downtown Buffalo and back. Passengers heading downtown would have to exit BRT buses at University Station, make their way into the station, take the long elevator or escalator to the LRT tunnel, and wait for the next train before completing the trip downtown. This will add 5 to 15 minutes (depending on how long they have to wait for the next train) to an already 50-minute long trip (10% to 30% increase). Also, in the Amherst direction, in addition to the mode shift, the potential for hundreds of passengers exiting the LRT and attempting to board 50-person BRT buses can overwhelm the bus system during peak periods. Commuters who have the choice to drive will not choose this inconvenient and terribly time-consuming option. Having to get up, gather one's belongings, and go out into the weather mid-journey at University Station to wait for another mode negates the important advantage of the one-seat transit ride: being able to read or prepare for one's workday ("Metrotasking") during the commute.

**3. BRT Fails to Leverage Prior Investments.** Buffalo has already invested in one of the most successful LRT systems in the country, ranked 4th in passengers per mile (pre-recession) and carrying 18% of all NFTA-Metro riders – this on a 6.4 mile LRT compared to over 1,000 miles of NFTA-Metro bus service! This past investment is worth billions in today's dollars that can be cost-effectively expanded to provide a seamless transit connection between Buffalo and Amherst – our largest and most populous suburb – along a corridor containing a large percentage of the current and future jobs, and in the process connecting all 3 UB campuses. Failing to leverage this prior investment would be a huge wasted opportunity and a colossal mistake. We ask the FTA to please respect Buffalo's LPA selection based on 10 years of work, decades of planning, and extensive stakeholder and public input. Please help us expedite moving forward on this project and leveraging the investments already made to build upon Buffalo's existing light rail.

Buffalo is growing again. The 2020 US Census have revealed that the city of Buffalo especially, and its surrounding communities had substantial growth, reversing a decades-long downward trend. The growth is attributed to Buffalo attracting immigrants from many different countries, as well as from New York City due to Buffalo's low cost of living and good job market.

Thirty percent of Buffalo's households do not own cars and depend on public transit for satisfying their transportation needs. This demand for public transportation will only grow as Buffalo attracts more immigrants. Buffalo's Metro Rail forms the high-speed transit spine that makes transit work for those who depend on it. It needs to be expanded to connect high priority destinations (e.g., airport, Bill's stadium) starting with UB's Amherst campus as originally planned.

Like many cities in the US, Buffalo experienced extensive suburban sprawl abetted by urban highways like the Kensington Expressway (Rt. 33) that ripped through minority neighborhoods in the city. A robust high-capacity transit system with Park & Rides will be key in eliminating these urban scars. The Amherst extension will help by providing one seat rides from Amherst and serving even further out suburbs to downtown Buffalo.

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A lot of research was done on what faculty, staff and students want for transit. Rail was heavily preferred to bus-based systems. Most important was the concept of a "single seat ride" whereby a patron should be able to board at North Campus and travel downtown and back without having to transfer to another conveyance.

Buffalo weather makes transportation difficult in winter, especially for the disabled. A transit system that requires moving on and off and between buses and trains is especially problematic. This is exactly what selecting BRT rather than an integrated light rail system will create; a major mode-shift bottleneck for all in the middle of a major transit corridor.

### Comparing the Three Options

#### Do Nothing Option.

In this case the consequences of "doing nothing" requires knowing what is currently in place, with the assumption that the current set of conditions would continue. We need to describe what we currently have before we can compare it to BRT and LRT.

UB currently runs buses between campuses. The main bus that connects UB's Amherst campus with the Main Street campus runs along Millersport and Grover Cleveland Highway, a very direct route between the campuses. The UB buses are branded as the "Stampede". The Stampede service adopts may BRT characteristics:

- Limited stops. There is only one stop off campus at Maynard Drive on Grover Cleveland Highway.
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- High frequency with average headways of about 3.5 minutes.
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However, the Stampede operates in traffic, which can be heavy at times, especially at Maple Road, Sheridan Drive, Main Street, and at University Plaza (northbound). Congestion at Main Street and Bailey Avenue, and at Millersport Highway and Maple Road is so bad that northbound buses use the right turn slip to make a “Jersey left” instead of making left turns. Bus bunching is common in both directions. See pictures below.

Citizens for Regional Transit made a brief study of the current service levels of Stampede and NFTA local service bus #44. With minor variations, UB Stampede and Metro bus follow the same alignment between Flint Circle and UB’s South Campus, which is depicted as the orange line on NFTA-Metro’s map (reproduced below). CRT’s study was conducted September 9, 2021 at the corner of Millersport Highway and Sheridan Drive from 3:30pm to 5:10pm. At this time of day most UB classes have ended for the day resulting in less than peak demand. Public school classes are also finished for the day at this time. Due to COVID-19, many people are working from home, which reduces congestion somewhat. The weather was 77 degrees with clear skies. Conditions were ideal. Traffic will never be better than this. Figure 2 compares the current Stampede and NFTA #44 bus routes (orange line) with the planned BRT and LRT alignments (blue line). The CRT-added red triangles show major conflict points (heavy crossing traffic, congestion).

UB obviously has a capacity issue with the current arrangement. Our survey shows UB is running extra buses attempting to meet capacity concerns. The data from our survey of Stampede buses is shown in Tables 1 and 2 of Appendix A.

The Stampede drops students at the upper level above the bus loop where NFTA buses connect with the subway. While technically meeting ADA requirements, making connections between the Stampede and subway service is a challenge on a good day and is nearly impossible when the weather is less than ideal. Making this connection adds 10 to 30 minutes to the total trip travel time for Stampede riders who need to make the connection to Buffalo Metro.

Choosing the “Do Nothing” option saddles UB with a constraint that limits the University’s future growth. Total travel time for passengers desiring to connect Stampede service with subway service will remain abysmal and is a hardship for people with disabilities.

#### Bus Rapid Transit (BRT) Option

The proposed BRT alignment is shown in Figure 2 above in comparison to the existing Stampede alignment.

The proposed BRT option is a compromise between a true BRT system having dedicated guideways with few conflict points and a basic local bus system. Rather than just one stop of the DO NOTHING option, the BRT option proposes 5 stops between UB North Campus and South Campus and requires negotiating several major intersections. With BRT buses running very tight headways along the longer alignment it will be virtually impossible to maintain schedule. With 3.5 minute headways it will not be possible to give all the buses priority and still provide enough time for clearing cross traffic.

From a traffic perspective, BRT will be untenable. With 312-minute headways, on average, a bus will approach each already congested intersection every 1 minute and 45 seconds. Giving BRT buses priority means that traffic on cross streets will have to be stopped longer than the current cycle times of the traffic lights. The only two options are to have BRT buses bunch and go behind schedule or stop traffic on busy cross streets to the point that congestion will clog them causing gridlock. Neither option is an acceptable one. We see no way around this issue. Motor vehicle drivers will be frustrated and angry, as will BRT passengers. Sharing routes and perhaps alignments with NFTA buses (e.g., the #34) will just make matters worse. The length of the BRT route, which extends through North Campus to I-990, is approximately twice the distance of the DO NOTHING option. To maintain 312-minute headways, twice as many buses, drivers and maintenance will be required while still not meeting the capacity needs of UB students. Future growth of UB will not be accommodated by the BRT alternative. If carbon-base fueled buses are replaced with electric buses, noise from

operations will be significantly reduced and tailpipe emissions transferred to the source of the electricity. However, electric buses are twice as expensive as regular buses adding significant initial and ongoing costs for the system.

When completed, the BRT Niagara Falls Boulevard alignment will add congestion to these already heavily congested roads:

- Niagara Falls Boulevard between Kenmore Avenue and Decatur
- Kenmore Avenue between Main Street and Niagara Falls Boulevard
- Main Street between Kenmore Avenue and Main Circle
- Niagara Falls Boulevard and Sheridan Drive
- Maple Road between Niagara Falls Boulevard and Sweet Home Road
- Sweet Home Road between Maple Road and Rensch Road

#### Light Rail Option

Citizens for Regional Transit submitted detailed comments to the NFTA DEIS on March 21, 2020. In that document we came out in support of the LRT option with documentation as to the many reasons why. We also made a few recommendations for improving the alignment. Please refer to our earlier submittal for detailed comments.

Both BRT and LRT will have construction impacts, slightly more for LRT. It will be important for all roads to remain open during construction.

Electric trains are the most environmentally sound option. Their tire-free low rolling resistance is the clear winner for every measure of environmentally friendly transportation. Minimal use of plastics, long vehicle life, and no greenhouse gas emissions make LRT the best from an environmental perspective. Since Buffalo Metro LRT uses electricity from the NYPA hydro power plant in Niagara Falls, it is an especially good choice from an environmental perspective here in Buffalo.

From a traffic perspective, LRT is the best option. With 10-minute headways in each direction a train will approach each already congested intersection only every 5 minutes providing ample time for cross traffic to clear.

LRT is the only option that allows UB to meet its current capacity needs along with room for future growth.

As we pointed out in our previous submission, the John J Audubon section of the project should use the west (currently southbound) for LRT and the east (currently northbound) lane for motor vehicle traffic. This mitigates noise and vibration in Walton Woods and better accommodates new mixed-use development plans north of I-990. Lastly, it is less safe to force thousands of students to cross John J Audubon parkway to board LRT trains.

CRT continues to enthusiastically support LRT over DO NOTHING and BRT options for the reasons summarized above.

#### Appendix A

##### Current Performance of UB Stampede Buses

See tables below for data on performance of UB Stampede buses with average 3.5 minute headways. However this performance is very variable, ranging from 0 seconds to 18 minutes. Obviously the Stampede is struggling to handle the load. NFTA buses moving along the corridor are also noted.

**Emails :**

**Notes :**

**Attachments :**

Citizens for Regional Transit\_Email\_10-14-2021.pdf (4 mb)



## **Metro Expansion Comments**

By Citizens for Regional Transit  
14 October 2021

Citizens for Regional Transit (CRT) is a community-based transit advocacy nonprofit that has worked to promote better public transit in Buffalo-Niagara for over 50 years. We served on the NFTA-Metro advisory committee for this project throughout the alternatives analysis and preliminary environmental assessments and continue to serve on the NFTA-Metro Citizens Advisory Committee that provides inputs to NFTA-Metro project and operational decisions. We submitted detailed comments on NFTA-Metro DEIS on 21 March 2021, which provide recommendations for implementing the proposed Metro Rail extension and comments on the associated environmental analyses. Our website ([www.citizenstransit.org](http://www.citizenstransit.org)) provides additional detail about our work. We look forward to working with the FTA and NFTA-Metro in taking this project to the next level.

### **Executive Summary**

We appreciate the FTA's willingness to serve as sponsoring agency for the Metro Transit Expansion and welcome them to the project and to Buffalo. Here's a summary of our comments as they relate to the identified topics:

- *The proposed scope of the EIS moving forward.* The EIS moving forward should build on work already completed by focusing on the Locally Preferred Alternative, light rail transit (LRT) analyzed in the NFTA-Metro Draft Environmental Impact Statement (DEIS) and previous studies over the last 50 plus years. Expanding this scope to reevaluate Bus Rapid Transit (BRT) will delay progress needlessly, as described below.
- *Metro's purpose and need.* The NFTA-Metro's purpose and need is reflected in their mission statement: "providing the highest level of safe, clean, affordable, responsive, and reliable public transportation." A fast, integrated LRT network, as the spine of the transit network is key to achieving this purpose and need. High volume corridors that require mode shifts, as selecting BRT for the Amherst extension would, work against this goal, as described below.
- *Alternatives to be considered.* We disagree that we should go back and restudy BRT. BRT was eliminated from consideration for the Amherst extension for good reason, as described below.
- *The environmental benefits and impacts to be evaluated.* Buffalo Metro Rail operates on clean electricity from the NY Power Authority's (NYPA) hydro power plant in Niagara Falls. LRT offers the least polluting high capacity solution that builds on prior investments, described below. It offers the cleanest per passenger mile pollution alternative.
- *Many other project-related issues and analyses.* This project has a long planning history that have led to the latest Locally Preferred Alternative (LPA) and DEIS planning documents. There are many local considerations that have informed the decision making process such as: the unique needs of UB, publicly owned available rail ROWs throughout the planned LRT network, and Buffalo's weather to mention a few. These are described below.



The FTA's requirement to restudy the Bus Rapid Transit (BRT) option is unnecessary. As explained in more detail below, here's why: (1) The NFTA, its consultants, and the community have already spent years selecting, refining, and evaluating the alternatives for this project, a process that included comparison of LRT with BRT along many possible alignments, establishing LRT to be the Locally Preferred Alternative (LPA). (2) Restudying this question will delay the project needlessly, further postponing implementation of desperately needed high-capacity, environmentally clean transit solutions; (3) The BRT alternative was rejected for many good reasons, outlined below; and (4) Selecting BRT fails to leverage the investment already made in building Buffalo's successful, functioning LRT.

### **1. We already spent many years evaluating project alternatives**

The original plan for Buffalo's light rail network was developed in the 1960s and 1970s revisited periodically over the years with the most recent major study completed in 2001 and updated in 2010. Based on these foundational plans, the first in-depth transit expansion evaluation began in for the Amherst extension in 2012. It progressed over the ensuing years and involved extensive stakeholder input and public outreach, resulting in identification of a LPA and a detailed DEIS. The LPA was refined in 2018, resulting in a modified alignment based on further public input. The new alignment better addressed the needs and concerns of key stakeholders and reduced overall costs. The Greater Niagara Regional Transportation Council (GBNRTC) sponsored and led a parallel Transit Oriented Development (TOD) study that found significant economic benefits along the planned LRT deployment. It has now been 10 years developing this latest plan for the Buffalo Metro LRT extension to Amherst. We don't need to go back and reconsider alternatives that have already been rejected and rejected for good reason!

### **2. Re-examining BRT will only add further delays**

Re-examining BRT will prolong the project needlessly. Buffalo deserves support in moving forward with the LPA selected after years of analyses completed in accordance with state and federal requirements and with extensive public and stakeholder input. We ask the FTA to respect the work already completed and support moving forward with the locally selected solution without delay.

### **3. BRT Will Not Provide the Needed Capacity and Will Require a Mode Shift in the Middle of Key Transit Corridor**

The selection of LRT for the Amherst extension is the only approach that will work effectively on this corridor for the following reasons:

Capacity. LRT can handle the UB student load because each train, with a top capacity of 700, can carry hundreds of passengers each trip. Buses can only carry 50 people (100 to 150 people with articulated buses, but these don't work well in snow and are not recommended for Buffalo). In order to carry the number of passengers demanding service between the UB campuses, selection of BRT featuring non-articulated (reduced capacity) buses would require bus departures every 3 to 5 minutes apart. This is not realistic, given the requirement for operation in



mixed traffic on Main Street and Kenmore Avenue and high-traffic cross intersections to navigate – intersections like Sheridan Drive that will need many minutes to clear crossing traffic. The inadequacy of bus-based transit for UB is evident every day on the bus system that UB currently operates (“The Stampede”), which regularly experiences bunching and overloading, even on the shorter, more direct Millersport / Grover Cleveland Highway route the Stampede now takes.

*Mode Shift Disruption.* The selection of BRT will require a mode shift in the middle of a critical transit corridor. This will significantly lengthen the travel time from Amherst to downtown Buffalo and back. Passengers heading downtown would have to exit BRT buses at University Station, make their way into the station, take the long elevator or escalator to the LRT tunnel, and wait for the next train before completing the trip downtown. This will add 5 to 15 minutes (depending on how long they have to wait for the next train) to an already 50-minute long trip (10% to 30% increase). Also, in the Amherst direction, in addition to the mode shift, the potential for hundreds of passengers exiting the LRT and attempting to board 50-person BRT buses can overwhelm the bus system during peak periods. Commuters who have the choice to drive will not choose this inconvenient and terribly time-consuming option. Having to get up, gather ones belongings, and go out into the weather mid-journey at University Station to wait of another mode negates the important advantage of the one-seat transit ride: being able to read or prepare for one’s workday (“Metrotasking”) during the commute.

**3. BRT Fails to Leverage Prior Investments.** Buffalo has already invested in one of the most successful LRT systems in the country, ranked 4<sup>th</sup> in passengers per mile (pre-recession) and carrying 18% of all NFTA-Metro riders – this on a 6.4 mile LRT compared to over 1,000 miles of NFTA-Metro bus service! This past investment is worth billions in today’s dollars that can be cost-effectively expanded to provide a seamless transit connection between Buffalo and Amherst – our largest and most populous suburb – along a corridor containing a large percentage of the current and future jobs, and in the process connecting all 3 UB campuses. Failing to leverage this prior investment would be a huge wasted opportunity and a colossal mistake.

We ask the FTA to please respect Buffalo’s LPA selection based on 10 years of work, decades of planning, and extensive stakeholder and public input. Please help us expedite moving forward on this project and leveraging the investments already made to build upon Buffalo’s existing light rail.

## **Background**

*Buffalo is growing again.* The 2020 US Census have revealed that the city of Buffalo especially, and its surrounding communities had substantial growth, reversing a decades-long downward trend. The growth is attributed to Buffalo attracting immigrants from many different countries, as well as from New York City due to Buffalo’s low cost of living and good job market.

*Thirty percent of Buffalo’s households do not own cars and depend on public transit* for satisfying their transportation needs. This demand for public transportation will only grow as Buffalo attracts more immigrants. Buffalo’s Metro Rail forms the high-speed transit spine that makes transit work for those who depend on it. It needs to be expanded to connect high priority



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Figure 1. Three northbound UB Stampede buses bunched.

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Figure 2 compares the current Stampede and NFTA #44 bus routes (orange line) with the planned BRT and LRT alignments (blue line). The CRT-added red triangles show major conflict points (heavy crossing traffic, congestion).

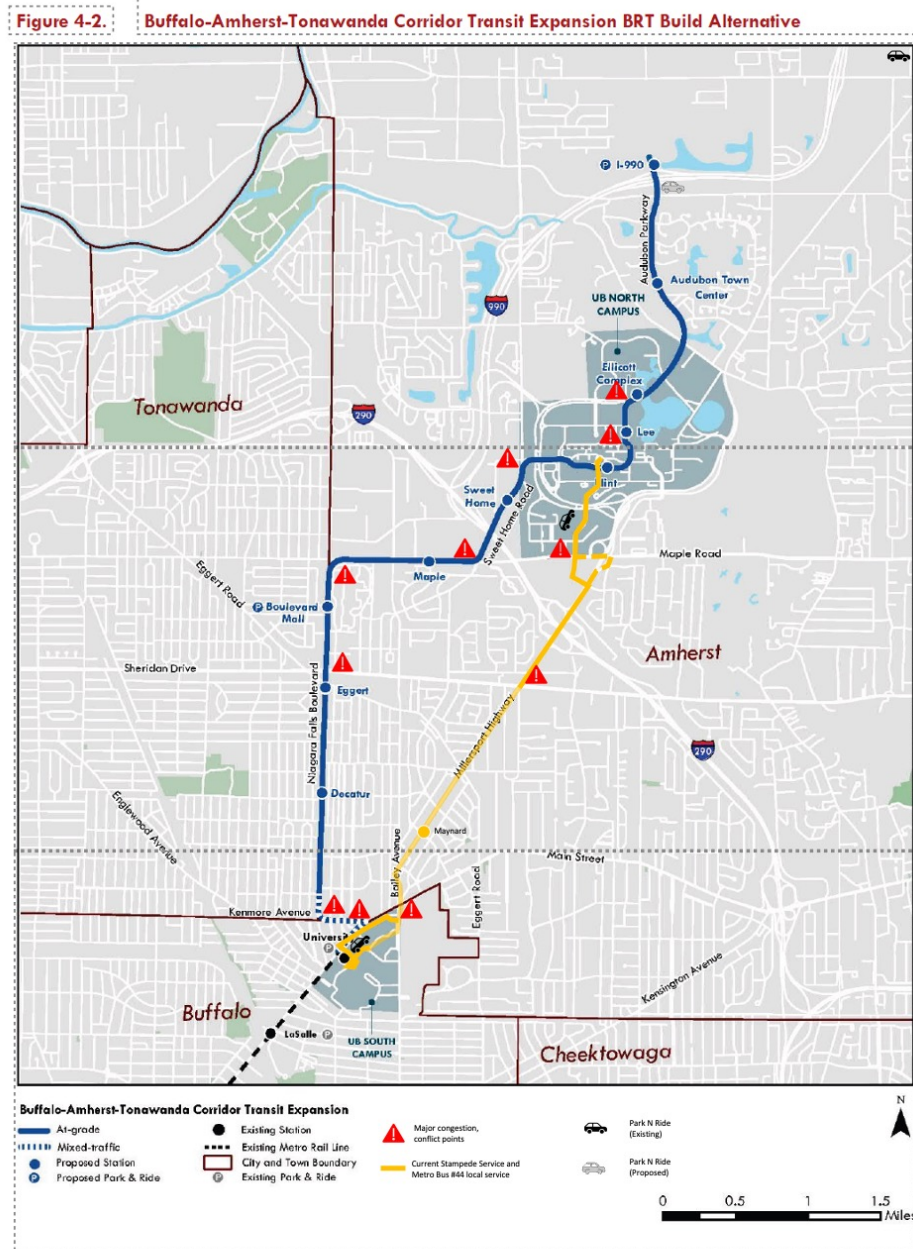


Figure 2. NFTA-Metro map (Figure 4.2) with CRT modifications comparing current and planned alignments and showing conflict points.



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When completed, the BRT Niagara Falls Boulevard alignment will add congestion to these already heavily congested roads:

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CRT continues to enthusiastically support LRT over DO NOTHING and BRT options for the reasons summarized above.



## Appendix A

### Current Performance of UB Stampede Buses

See tables below for data on performance of UB Stampede buses with average 3.5 minute headways. However this performance is very variable, ranging from 0 seconds to 18 minutes. Obviously the Stampede is struggling to handle the load. NFTA buses moving along the corridor are also noted.

**Table 1. Stampede Performance – Southbound**

Bus #	Enter Intersection	Clear intersection	Time to clear	Time between buses (Headway)
BRT Unk	3:43:36 PM	3:46:27 PM	02 min : 51 sec	
NFTA 1105	3:48:58 PM	3:50:05 PM	01 min : 07 sec	03 min : 38 sec
BRT Unk	3:52:43 PM	3:54:27 PM	01 min : 44 sec	04 min : 22 sec
BRT 4132	3:54:49 PM	3:56:58 PM	02 min : 09 sec	02 min : 31 sec
BRT 4117	3:54:49 PM	3:57:09 PM	02 min : 20 sec	00 min : 11 sec
BRT Unk	3:58:41 PM	4:00:20 PM	01 min : 39 sec	03 min : 11 sec
BRT 4118	4:00:02 PM	4:05:57 PM	05 min : 55 sec	05 min : 37 sec
BRT Unk	4:08:11 PM	4:11:07 PM	02 min : 56 sec	05 min : 10 sec
BRT Unk	4:08:11 PM	4:11:07 PM	02 min : 56 sec	00 min : 00 sec
BRT Unk	4:08:11 PM	4:11:07 PM	02 min : 56 sec	00 min : 00 sec
BRT Unk	4:11:35 PM	4:11:46 PM	00 min : 11 sec	00 min : 39 sec
BRT Unk	4:11:35 PM	4:11:46 PM	00 min : 11 sec	00 min : 00 sec
BRT 4132	4:30:14 PM	4:30:26 PM	00 min : 12 sec	18 min : 40 sec
BRT 4129	4:30:14 PM	4:30:26 PM	00 min : 12 sec	00 min : 00 sec
BRT 4111	4:38:24 PM	4:38:56 PM	00 min : 32 sec	08 min : 30 sec
BRT 4128	4:40:17 PM	4:41:42 PM	01 min : 25 sec	02 min : 46 sec
BRT Unk	4:45:58 PM	4:46:15 PM	00 min : 17 sec	04 min : 33 sec
BRT 4131	4:53:55 PM	4:56:47 PM	02 min : 52 sec	10 min : 32 sec
NFTA 1106	4:57:51 PM	5:00:13 PM	02 min : 22 sec	03 min : 26 sec
BRT Unk	4:59:40 PM	5:00:13 PM	00 min : 33 sec	00 min : 00 sec
BRT 4118	5:00:02 PM	5:02:52 PM	02 min : 50 sec	02 min : 39 sec
BRT 4129	5:00:02 PM	5:02:56 PM	02 min : 54 sec	00 min : 04 sec
BRT 4132	5:00:02 PM	5:03:01 PM	02 min : 59 sec	00 min : 05 sec
BRT 4107	5:04:26 PM	5:06:39 PM	02 min : 13 sec	03 min : 38 sec
BRT Unk	5:04:26 PM	5:06:39 PM	02 min : 13 sec	00 min : 00 sec
		Max	05 min : 55 sec	18 min : 40 sec
		Min	00 min : 11 sec	00 min : 00 sec
		Average	01 min : 56 sec	03 min : 21 sec



**Table 2. Stampede Performance – Northbound**

Bus #	Enter Intersection	Clear intersection	Time to clear	Time between buses (Headway)
BRT 4117	3:35:02 PM	3:36:27 PM	01 min : 25 sec	
BRT 4146?	3:36:37 PM	3:38:45 PM	02 min : 08 sec	02 min : 18 sec
BRT 4118	3:43:21 PM	3:44:40 PM	01 min : 19 sec	05 min : 55 sec
BRT Unk	3:46:40 PM	3:47:50 PM	01 min : 10 sec	03 min : 10 sec
BRT 4112	3:49:26 PM	3:50:38 PM	01 min : 12 sec	02 min : 48 sec
BRT Unk	3:49:28 PM	3:50:40 PM	01 min : 12 sec	00 min : 02 sec
NFTA Unk	3:55:05 PM	3:56:19 PM	01 min : 14 sec	05 min : 39 sec
BRT 4129	4:02:48 PM	4:06:11 PM	03 min : 23 sec	09 min : 52 sec
BRT Unk	4:08:44 PM	4:11:07 PM	02 min : 23 sec	04 min : 56 sec
BRT Unk	4:11:07 PM	4:12:06 PM	00 min : 59 sec	00 min : 59 sec
BRT Unk	4:16:43 PM	4:17:49 PM	01 min : 06 sec	05 min : 43 sec
BRT 4112	4:26:42 PM	4:29:44 PM	03 min : 02 sec	11 min : 55 sec
NFTA 1010	4:30:55 PM	4:32:43 PM	01 min : 48 sec	02 min : 59 sec
BRT 4131	4:30:55 PM	4:32:51 PM	01 min : 56 sec	00 min : 08 sec
BRT 4117	4:37:22 PM	4:38:42 PM	01 min : 20 sec	05 min : 51 sec
BRT Unk	4:42:52 PM	4:43:29 PM	00 min : 37 sec	04 min : 47 sec
BRT 4118	4:43:29 PM	4:44:37 PM	01 min : 08 sec	01 min : 08 sec
BRT 4132	4:44:43 PM	4:44:43 PM	00 min : 00 sec	00 min : 06 sec
BRT 4107	4:45:12 PM	4:45:25 PM	00 min : 13 sec	00 min : 42 sec
BRT 4129	4:45:12 PM	4:45:28 PM	00 min : 16 sec	00 min : 03 sec
BRT 4133	4:47:46 PM	4:47:46 PM	00 min : 00 sec	02 min : 18 sec
BRT 4111	4:53:42 PM	4:53:42 PM	00 min : 00 sec	05 min : 56 sec
BRT Unk	4:54:53 PM	4:55:20 PM	00 min : 27 sec	01 min : 38 sec
BRT 4128	4:56:36 PM	4:56:36 PM	00 min : 00 sec	01 min : 16 sec
BRT 4112	5:00:39 PM	5:02:35 PM	01 min : 56 sec	05 min : 59 sec
NFTA Unk	5:05:19 PM	5:05:54 PM	00 min : 35 sec	03 min : 19 sec
		Max	03 min : 23 sec	11 min : 55 sec
		Min	00 min : 00 sec	00 min : 02 sec
		Average	01 min : 11 sec	03 min : 35 sec

**NFTA - RECORD #957 DETAIL****Submission Date :** 10/12/2021**First Name :** Gloria**Last Name :** Colbert**Submission Content/Notes :** "With regards to the metro rail project, please be advised that my husband and I ARE NOT IN FAVOR of this expansion.

As residents of the Audubon Community, we moved to this neighborhood because of the natural and relatively quiet setting. Having the rail project extend beyond the UB North Campus down JJ Audubon Parkway will candidly be disruptive for years due to construction, and forever thereafter, due to the inherent noise and vibration of the rail stopping and going within meters of our backyard.

Additionally, it is unclear to us what benefit there is in extending the rail beyond the UB North Campus. Yes, there are a few businesses on JJ Audubon Parkway that may employ workers from the city; however, it is unlikely that the volume of such justifies a multi-million dollar project. Wouldn't it be better and easier to improve upon the existing bus service? When we asked why NFTA has not already done so, we were told that the number of riders is too low to justify such a bus expansion; therefore, what is the justification to extend the rail down JJ Audubon beyond UB North Campus?

Given the rail commute time to downtown, it is also highly unlikely anyone with a car will opt for this option. It's frankly just too long of a commute on rail. And for those who want a night downtown that may involve a few drinks, they still have to return to their parked car and drive home...Uber has solved this problem.

In conclusion, from our perspective the cost benefit analysis doesn't equate. And we vote for no rail extension."

**Emails :****Notes :**

**NFTA - RECORD #976 DETAIL****Submission Date :** 9/15/2021**First Name :** Colum**Last Name :** Cross

**Submission Content/Notes :** So, I have a few points I want to hit on. First and foremost, I believe LRT is way better than BRT. The only difference between a good bus rapid transit and light rail transit is that bus rapid transit has rubber tires. The problem with going with BRT over LRT is like people said: you're committed to tunnels. You have to put rails and that means you're committed to the project. With BRT you have something called bus rapid transit which means that now it's going to be the same as the LRT. But we don't have enough money. Let's not do the dedicated lanes. Let's make the bus lanes on the outer side of Niagara Falls boulevard. Let's get rid of the bus lanes completely. Let's not run it this way and then the next thing you know you have the route 34, which already exists. So go LRT. A couple of other things. One, everyone says that this is only going to serve the UB North Campus. That is incorrect. This is going up past Audubon Parkway to a Park & Ride that would absolutely serve the tons of people who have moved to Lockport and commute to Downtown Buffalo. I know several people that move to Lockport and commute to Downtown Buffalo.

Another thing that's brought up and that keeps getting brought up on the public maps is traffic. You're going to close two lanes in either direction on Niagara Falls Boulevard for this light rail. What's going to happen to the traffic? Simple, take the train. Yes, you wonder where all of this traffic's going to go. It's going to go on the train that you're building. If you don't want to be a part of traffic, if you hate traffic, don't be a part of it. The only reason there's traffic is that you want to drive. You're not physically connected to your car. You can take the train and that's what people should be doing and people will be doing. If you put a park & ride up in Audubon (and I know the Phase Two is to bring it all the way to Crosspointe), people from Lockport will be driving down there as opposed to clogging up the interstates and Niagara Falls Boulevard to get into work.

About noise, if there's like hundreds of fewer cars driving through Niagara Falls Boulevard, cars are louder and buses are louder than a train. A train is much quieter than those things. So the noise will go down because the traffic will go down. The traffic will go down because people will be taking the train that we're building.

The other big thing is the timeline. I'm very disappointed that the timeline is this far out. I mean just for the environmental plans. We needed to have built this yesterday. I know people that have graduated from UB. They say, we already have the UB buses that go up. I don't know this. I know people say that they didn't take the UB buses. They said, if the light rail that is proposed now existed back then, people from UB would be coming down to Downtown Buffalo constantly and you would have this bigger economic development. People that go to UB would stay in Buffalo. Buffalo has increased its population for the first time in 10 years. We need a light rail to mimic that. Thank you.

**Emails :****Notes :**



**NFTA - RECORD #922 DETAIL****Submission Date :** 10/13/2021**First Name :** Donna**Last Name :** Czaja

**Submission Content/Notes :** This "one seat ride" feature of light rail is important for people with disabilities, but also to everyone because they would have to make the transfer. This will add 10 to 30 minutes to their travel time if Bus Rapid Transit were chosen instead of Light Rail. Transfer involves movement between the Stampede bus stop and the subway platform at the South Campus rapid transit subway station involving two elevators and a sloping sidewalk that crosses 3 roads. This is not user friendly to anyone using the system but especially people with disabilities.

**Emails :****Notes :**

**NFTA - RECORD #980 DETAIL****Submission Date :** 9/15/2021**First Name :** Danielle**Last Name :** Darowz

**Submission Content/Notes :** I'm speaking tonight as a taxpayer and Amherst resident in opposition of the subway expansion. I particularly have concerns of the environmental impact. If underground, what will this do to drainage within nearby neighborhoods and what will this do to the stability of aging homes and businesses' foundations during the blasting and digging? We are in a high radon gas area and will these gases be emitted to the air and will this become a public health concern?

When Niagara Falls Boulevard was built in the 80s and 90s, I was growing up in the Town of Tonawanda. There was a major rat problem all the way to Englewood. I imagine the Amherst side had issues too environmentally. Buses powered by natural gas, electricity, and hydrogen fuel cells are available in development and would be a much better option given the cost to build this. How many people will be needed to pay fares to make an ROI on this investment? Excuse me, if there is this much of a demand, I would think that if UB is pushing this, they could help fund this project.

I did ride the Metro Rail for one month after I graduated to my job at M&T. I quickly learned that if you were stuck at work late how unsafe that the Metro Rail was. After that I started to pay for parking and drove to work every single day.

Finally, economically, it's a major waste of my taxpayer dollars that could be better spent elsewhere and jobs are becoming more "work from home" which reduces the need to commute and less cars on the road. Thank you.

**Emails :****Notes :**

**NFTA - RECORD #954 DETAIL****Submission Date :** 9/24/2021**First Name :** Ryan**Last Name :** DiFranco**Submission Content/Notes :** "Thank you for allowing input. If I can add an extension to a previous comment. All the benefits of rail expansion and increased ridership as seen by a car ban in city of Paris by 2022! Not suggesting a car ban but additional rail lines can help reduce on noise and auto pollution to a city. Create a train system that is clean, safe, and reaches all parts then people with start to use it and embrace it!

<https://www.forbes.com/sites/enriquedans/2021/05/25/europes-cities-finally-get-serious-about-freeing-up-their-streets-fromtraffic/?sh=5dcfd06d5508>"

**Emails :****Notes :**

**NFTA - RECORD #948 DETAIL****Submission Date :** 9/20/2021**First Name :** Ryan**Last Name :** DiFranco

**Submission Content/Notes :** "After moving here from a larger city and seeing that highway expansion or road expansion doesn't lead to less crowded streets. I am in full favor of pushing for any and all expansion of the metro. I think if we look to the model of Europe and larger cities-- its inevitable if Buffalo wants to expand into a larger city and it will, you should strongly consider expanding the Metro.

There is a stigma to a bus system in America that definitely doesn't invite everyone to be comfortable and also is still run on the streets which will add to traffic congestion and doesn't fix the problem. "

**Emails :****Notes :**

**NFTA - RECORD #978 DETAIL****Submission Date :** 10/15/2021**First Name :** Róisín**Last Name :** Doherty

**Submission Content/Notes :** Buffalo in the 1970s had a plan for a visionary light rail system that would bring back some of the glory days of the Buffalo streetcar system. However, because of opposition, the mainline was never finished and the line was stunted with a line going from an undeveloped waterfront to an underused campus with little effort to propose transit-oriented development. Due to NFTA's plan to run the light rail underground in the suburban residential section and above ground in the narrow downtown, this flew directly in the face of all previous light rail development across the world and led to the stunted growth of the light rail system. We now have the chance to fix these wrongs and give the suburbs of Buffalo and the future generations the ability to have the light rail system and safety from the high-speed traffic along NFB that they deserve.

Amherst is a part of the NFTA area that has to pay for bus transit in crowded roads with no dedicated lanes and excessive noise. Due to the nature of rubber wheels on asphalt, they have to pay for a transit system. They deserve a transit system worth paying for that's quiet and has road calming and has fast light rail service. Not only will it make NFB significantly safer for children and pedestrians, but families would not have to worry about speeding out of a driveway at 50-miles-an-hour traffic because, let's face it, nobody follows the speed limit on NFB.

With Buffalo's predicted growth due to climate change and lower cost of living, traffic will only continue to worsen along NFB and arterial roads. Due to growing population and lack of transit to UB, forcing car dependency, adding lanes doesn't work. Only expanding access to the public transit truly dampens traffic problems. With light rail, we can have higher capacity, lower intervals and faster travel. Less parking lots at UB will create more jobs as the lots are replaced with new buildings and they hire more local employees to work on campus as well as build all of this new development. This means more workers commuting to the light rail system all while promoting business along the corridor and significantly increasing the value of NFB-facing housing with a system that will be built to last longer than any bus and decreasing the wear on surrounding roads. So families can avoid an increase in potholes that Western New York is famous for.

In conclusion, I would like to remind those reviewing comments that the polling has shown light rail expansion to be overwhelmingly popular. It'll improve traffic. It'll make home values rise. It'll attract small businesses. It'll increase business. It will keep your roads in better condition and keep them quieter because the light rail is the safest, greenest, quietest, best, and only solution good enough for Amherst, Buffalo and the NFTA system. Thank you.

**Emails :****Notes :**

**NFTA - RECORD #961 DETAIL**

**Submission Date :** 10/14/2021

**First Name :**

**Last Name :** Erie County

**Submission Content/Notes :** "The County of Erie (the ""County"") has reviewed the above-referenced NEPA Scoping Information Packet. The County previously commented on several topics during the preparation of the Draft Environmental Impact Statement (EIS) in 2020. The County requests that the NFTA consider the below topics as it moves forward with the NEPA process, including the preparation of the EIS and preliminary designs.

The County would like to reiterate its concerns regarding potentially significant traffic congestion and roadway safety impacts resulting from the implementation of either the LRT or BRT alternatives. While adverse impacts to traffic congestion and safety are possible at specific locations, the County is primarily concerned with impacts on County Roads, including Maple Road and Sweet Home Road.

The County would like Draft EIS traffic analysis to evaluate the potential of proposed changes in traffic patterns resulting in an increased diversion of traffic onto minor roads intersecting the corridor. The Draft EIS traffic analysis should be based on the latest available data from GBNRTC, and should include an updated list of development projects and infrastructure upgrades planned or under development within the corridor, particularly those within the Town of Amherst Boulevard Central District.

The County believes that the Draft EIS and preliminary designs should include an evaluation of opportunities to include express service in both the BRT and LRT alternatives. While the NFTA may not want to move forward with an express service line at this time, evaluating the potential of two lines coexisting on the same route may allow for it to be incorporated in the future. Planning for both a regular line that provides service to each of the ten proposed stations, along with an express line would accommodate both riders seeking access to one of the ten planned stations and those seeking quick travel between the two endpoints of the corridor, including for example, parkand-ride users and UB students, particularly if the UB shuttle bus service is terminated.

The Draft EIS should include an analysis of how planned parcel acquisitions will impact businesses, resulting in a potential loss or displacement of jobs and any resultant economic impacts. The NFTA should commit to coordinating with affected property owners and tenants to minimize property acquisitions and displacements. The Draft EIS should include a timeline and identify next steps related to potential property acquisitions.

The Draft EIS should include an analysis comparing potential loss in tax revenue due to parcel

acquisition with long-term increases in property values due to the implementation of the project.

The Draft EIS should include an analysis comparing the estimated costs for both the LRT and BRT alternatives, including anticipated costs of construction, property acquisition, and operations. This analysis should also include anticipated funding sources for the project.

The Draft EIS should include approximate timelines for preliminary/final design, preconstruction, construction, and testing phases.

Ensuring that Erie County residents have access to clean, sustainable, efficient, safe, and reliable public transportation services is a major priority of the Poloncarz Administration. Erie County looks forward to continuing our close coordination with NFTA, the Technical Advisory Committee, the City of Buffalo, and the Towns of Amherst and Tonawanda on the implementation of the Buffalo-AmherstTonawanda Corridor Transit Expansion."

**Emails :**

**Notes :**

**Attachments :**

Erie County\_Email\_10-14-2021.pdf (94 kb)



# COUNTY OF ERIE

**MARK C. POLONCARZ**

COUNTY EXECUTIVE

October 14, 2021

Metro Transit Expansion Project  
c/o Service Planning  
181 Ellicott Street  
Buffalo, NY 14203

Re: **Buffalo-Amherst-Tonawanda Corridor Transit Expansion NEPA Scoping**  
Review No.: **M617-21-613**

The County of Erie (the "County") has reviewed the above-referenced NEPA Scoping Information Packet. The County previously commented on several topics during the preparation of the Draft Environmental Impact Statement (EIS) in 2020. The County requests that the NFTA consider the below topics as it moves forward with the NEPA process, including the preparation of the EIS and preliminary designs.

- The County would like to reiterate its concerns regarding potentially significant traffic congestion and roadway safety impacts resulting from the implementation of either the LRT or BRT alternatives. While adverse impacts to traffic congestion and safety are possible at specific locations, the County is primarily concerned with impacts on County Roads, including Maple Road and Sweet Home Road.
- The County would like Draft EIS traffic analysis to evaluate the potential of proposed changes in traffic patterns resulting in an increased diversion of traffic onto minor roads intersecting the corridor. The Draft EIS traffic analysis should be based on the latest available data from GBNRTC, and should include an updated list of development projects and infrastructure upgrades planned or under development within the corridor, particularly those within the Town of Amherst Boulevard Central District.
- The County believes that the Draft EIS and preliminary designs should include an evaluation of opportunities to include express service in both the BRT and LRT alternatives. While the NFTA may not want to move forward with an express service line at this time, evaluating the potential of two lines coexisting on the same route may allow for it to be incorporated in the future. Planning for both a regular line that provides service to each of the ten proposed stations, along with an express line would accommodate both riders seeking access to one of the ten planned stations and

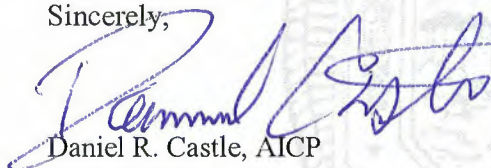


those seeking quick travel between the two endpoints of the corridor, including for example, park-and-ride users and UB students, particularly if the UB shuttle bus service is terminated.

- The Draft EIS should include an analysis of how planned parcel acquisitions will impact businesses, resulting in a potential loss or displacement of jobs and any resultant economic impacts. The NFTA should commit to coordinating with affected property owners and tenants to minimize property acquisitions and displacements. The Draft EIS should include a timeline and identify next steps related to potential property acquisitions.
- The Draft EIS should include an analysis comparing potential loss in tax revenue due to parcel acquisition with long-term increases in property values due to the implementation of the project.
- The Draft EIS should include an analysis comparing the estimated costs for both the LRT and BRT alternatives, including anticipated costs of construction, property acquisition, and operations. This analysis should also include anticipated funding sources for the project.
- The Draft EIS should include approximate timelines for preliminary/final design, preconstruction, construction, and testing phases.

Ensuring that Erie County residents have access to clean, sustainable, efficient, safe, and reliable public transportation services is a major priority of the Poloncarz Administration. Erie County looks forward to continuing our close coordination with NFTA, the Technical Advisory Committee, the City of Buffalo, and the Towns of Amherst and Tonawanda on the implementation of the Buffalo-Amherst-Tonawanda Corridor Transit Expansion.

Sincerely,



Daniel R. Castle, AICP  
Commissioner

Department of Environment and Planning

**NFTA - RECORD #937 DETAIL****Submission Date :** 9/15/2021**First Name :** Edward**Last Name :** Fibich

**Submission Content/Notes :** I am a young Buisness owner of a successful barbershop next to the best st subway station in a building with 214 apartments, mostly all from out of town. The number 1 topic other than the growth of the city and where to get the best wings is absolutely how desperately we need an expansion of the subway system. I have spent much time working as a barber in NYC and I truly believe that city had a huge advantage with their subway system. You notice in every major city, huge development in areas around the subway stations. I believe opening up buffalo to subway travel from outside the city and from/to the airport would make this city flourish. Please fight for this. The future of this city truly needs a better public transit.

**Emails :****Notes :**

**NFTA - RECORD #919 DETAIL**

**Submission Date :** 10/7/2021

**First Name :** Liam

**Last Name :** Fischer

**Submission Content/Notes :** I support this project. In order to defeat climate change we need a multi-faceted approach which includes investing in more transit options. This project will help take polluting cars off the road and build a more sustainable and livable Western New York.

**Emails :**

**Notes :**

**NFTA - RECORD #982 DETAIL****Submission Date :** 9/15/2021**First Name :** Doug**Last Name :** Funke

**Submission Content/Notes :** I'm a retired transportation research engineer. I worked for over 30 years at Calspan in the transportation research department. I'm currently the president of Citizens for Regional Transit advocacy organization. I also served on the project advisory committee, the NFTA committee that was advising the NFTA throughout the process of picking the preferred alternative that was a several-year process. There were other committees also providing inputs. A lot of work went into that. A lot of deep analyses and discussions and so forth. There were also several public meetings over those years. Again with a lot of public input, with presentations and so forth from the NFTA. The result of that was the selection of the light-rail alternative. I hope we don't lose all of that valuable work and the public outreach in terms of making our selection and then jump to another alternative that really didn't serve as well.

A couple of quick comments about why it's so important in our view to choose the light rail alternative. First and foremost is capacity. Every light rail four car train can carry 600 people comfortably. You can squeeze more on after a Sabers' game or when you really need to but 600 people comfortably at every 10 minutes. If you compare that to bus rapid transit, buses can carry 50 people. So if you want to carry the number of people going from UB to the Main Street campus, you're going to need a lot of buses that carry that many people and you're not going to be able to achieve the headways. You need to really successfully do that. The light rail was part of the original plan 40 years ago. I'd hate to see that not actually come to fruition now that we finally are able to move forward.

Then, the last point is if you do go with a bus rapid transit, you're going to have a two-seat ride. So people going from UB, which is going to be a large proportion of the riders on light rail, they'll have to get off the light rail, wait for a bus to continue, and so forth. That's not a good option. So thank you again for your patience and for letting me talk at the end here. Again, we really support the light rail alternative. It's the best alternative that can do the job that we need to do. Thank you.

**Emails :****Notes :**

**NFTA - RECORD #963 DETAIL****Submission Date :** 9/15/2021**First Name :** Elizabeth**Last Name :** Giles

**Submission Content/Notes :** We are all witness to the unequivocal climate catastrophe unfolding before our eyes in California, New Orleans, Tennessee, and New York City this summer alone due to excessive greenhouse gas emissions. Because of these emissions or because they come from the transportation sector mostly and within that sector mostly from cars, we must find ways to reduce vehicle miles traveled by cars and find ways to move more people more efficiently over distances with less energy and carbon expended.

A full four-car light rail train not only provides a faster more comfortable and convenient ride than BRT but has the capacity to move as many people as 12 buses or anywhere from 250 to 600 cars every 10 minutes. Moreover, in Western New York we already run that high-capacity rail transit on clean renewable hydroelectricity generated by Niagara Falls. What a rare opportunity. The Amherst Metro Rail Extension is one of several potential future rail lines that would interconnect this region's highest demand destinations augmented by buses and bikeways. It would be the spine of a sustainable comprehensive multimodal mobility system in Buffalo- Niagara that is not centered around the automobile. We are at a crossroads as a society and here in Western New York we're in a position to set an example for other transit systems to aspire to serving the needs for a cleaner environment for economic development and the needs of the disadvantaged together in one investment that is sure to catalyze more all while drastically reducing our carbon footprint and providing better transportation alternatives for all demographic groups.

As we compare BRT and LRT, I hope that we will compare the carbon emissions produced by these different modes. I hope that we will compare the lifespan of a light rail car versus a bus, even an electric bus, as we're looking at the costs and the environmental impacts. Thank you very much for your time.

**Emails :****Notes :**

**NFTA - RECORD #959 DETAIL**

**Submission Date :** 10/14/2021

**First Name :** James

**Last Name :** Gordon

**Submission Content/Notes :** "My name is James Gordon and my comments herein do not represent any organization. My comments are as a citizen and resident of Buffalo, NY. Although I am now or have been affiliated with the following organizations, my comments do not represent Citizens for Regional Transit, the University at Buffalo (UB), the UB Professional Staff Senate, the UB Faculty Senate, or the New York State Thruway Authority.

The NFTA and FTA request comments on three alternatives:

- Do Nothing
- BRT Option
- LRT Option

Of the above Options, I support the LRT Option.

While not currently a consideration I think a fourth option I will call the Subway Option is the best alternative. I urge FTA to add extending the Subway Option as an additional option for consideration for the Amherst Corridor project.

As a transit and bicycle rider who graduated from UB and worked there for more than 20 years, I am familiar with the proposals.

The table below compares factors I consider to be important. Factors that are deleterious are in red. Following the chart is a brief analysis of each factor.

There is a blocking issue that must be addressed in the Amherst Corridor project. The issue is passenger transfer between the Stampede bus stop (which would become the BRT bus stop should BRT be adopted) and the subway platform at Main Circle on UB South Campus. When surveyed, UB faculty, staff and students overwhelmingly rejected any transit option that did not offer what Campus Architect Professor Robert Shibley branded the "one-seat-ride."

There is a Reporter (UB's Official newspaper at the time) article about this topic:

UB Reporter - University at Buffalo

[https://www.buffalo.edu/ubreporter/archive/2010\\_01\\_13/commuting.html](https://www.buffalo.edu/ubreporter/archive/2010_01_13/commuting.html)

Jan 14, 2010 · UB's comprehensive physical plan, as well as its climate action plan, call for a "oneseat-ride" from the Downtown Campus to the North Campus, eliminating the need for commuters

to switch vehicles along the way, says Robert G. Shibley, professor of architecture and planning and a senior advisor to President John B. Simpson on the comprehensive plan.

The transfer of passengers between Stampede Bus and subway is disastrous for people with disabilities. The transfer issue makes the Do Nothing Option and BRT Option completely unacceptable.

The capacity issue also makes Do Nothing Option and BRT Option

completely unacceptable.  
Please see the table below and the analysis after the table for details."

**Emails :**

**Notes :**

**NFTA - RECORD #973 DETAIL****Submission Date :** 9/15/2021**First Name :** James**Last Name :** Gordon

**Submission Content/Notes :** I was born in Buffalo and I live in North Buffalo near Delaware and Hertel. I am a University at Buffalo graduate with a degree in Management of Information Systems. I attended UB in the 1990s. I worked full time at UB's north campus for more than 20 years. I commuted to UB from North Buffalo using UB's private bus rapid transit system called the Stampede and by bicycle most of the time. I did not drive my car. Tonight, I am not representing any organization.

I am familiar with the issues and alignments under consideration. UB's current private bus rapid transit system utilizes a 4.2-mile-long corridor on Millersport Highway. BRT fails due to bus bunching from congestion at Maple Road, Sheridan Drive, and Main Street. The current BRT is unable to reliably meet the transportation needs of University students, faculty and staff. The PLA adds additional congestion challenges at Wrench Road, Maple Road, and Kenmore Avenue. The PLA does not explain why a tunnel is required for making a left turn from Maple Road east to Sweet Home Road north for the LRT. But, not for the BRT, the same factors are in play. BRT needs a tunnel there just as much as LRT with five-minute BRT headways on average, every 2.5 minutes in both directions. Traffic signals will have to stop all the other traffic long enough to clear the gridlock and congestion and allow the BRT buses to pass through LRT with 10-minute headways that meet capacity needs with less impact on cross-street traffic. It is unlikely BRT will be able to operate without significant bus punching. The PLA is not a rapid transit plan. A rapid transit plan would extend the existing subway from UB South Campus. Rapid transit station underground to Clemens Hall on UB's North Campus. The trip time would be cut from 20 minutes down to 6 minutes. I think the subway extension alignment and cost should be reconsidered in the analysis. New tunneling technology may cost less now. The subway option would require no buses and fewer train sets. It would be climate-resilient. It is the most reliable alternative being unaffected by ice snow, sleet and rain. The subway would produce no operational greenhouse gases and cost less to operate than the PLA options. The subway extension would provide the desired one-seat ride. Thank you.

**Emails :****Notes :**



**NFTA - RECORD #907 DETAIL****Submission Date :** 9/13/2021**First Name :** Lauren**Last Name :** Greene

**Submission Content/Notes :** Our concerns remain the same...  
Our home, and those around it, suffer from sinking foundations. There's no denying the affect construction and this project will have on our area. We did not buy property in The AUDUBON development to live along side train tracks. We choose to live here because of the beautiful wildlife that surrounds us. We live in the suburbs by choice. Nor do we (or our neighbors) want to commute downtown via train. If this project has to do with connecting UB North and South campus, figure it out, without extending down John James Audubon and past my backyard. PLEASE....

**Emails :****Notes :**

**NFTA - RECORD #967 DETAIL****Submission Date :** 9/15/2021**First Name :** David**Last Name :** Grek

**Submission Content/Notes :** I'm a concerned citizen having grown up in the City of Buffalo near the Lasalle Street station and I grew up in the 80s and 90s. At that point in time, all of the debris that was blasted from underground to create Lasalle Street station was dumped in McCarthy Park right at the end of the street where I grew up. There were piles of stone rubble mud that were set aside and impacted us and were not rectified for over 25 years. So obviously I have concerns that NFTA or the government in general will do what's right for its citizens in terms of creation of these subway stations.

In addition to the blasting, it should be noted that the western New York area is very heavy with radon gases. If there are underground trains at all, we're going to be releasing poisonous gases into the environment. And what are the other environmental impacts that we have to be concerned with from the city all the way out through Sweet Home Road and the Audubon train station where we have forested areas? What is going to be the impact on the native deer, bird and other animal populations as well? It's going to have a significant impact.

Additionally, even if you go above ground, again, the Main Street to Kenmore to Niagara Falls Boulevard area is extremely heavy with car traffic. There is nowhere to put an above ground rail.

It should also be noted that upon the creation of the initial train station, which began use I believe in the late 70s and the early 80s, it immediately destroyed downtown Buffalo. Without the option to drive cars on Main Street downtown, it immediately impacted the entire retail and business community as a result. It's going to have a negative impact on the Boulevard as well. It's going to choke out the existing businesses that are barely starting to recover even as the Boulevard Mall right now is suffering and is subject to redevelopment. So whether it is an underground train station or above ground, it's going to have negative impacts both on the economy and the environment. I grew up on a dead-end street right by a park. I know firsthand. We also haven't talked about the additional impacts of crime as a result of this. Having grown up in the city, having taken the train multiple times, I know the criminal element that exists within the train stations. I've seen drug deals go down in train stations. When you leave the train station as well and step foot off of the train station grounds, there are criminals lying in wait. I was robbed as a student at Canisius College walking home from the Lasalle Street train station in the 90s. So there are significant environmental impacts as well as criminal impacts, thank you.

**Emails :****Notes :**

**NFTA - RECORD #911 DETAIL****Submission Date :** 9/29/2021**First Name :** Christina**Last Name :** Heath

**Submission Content/Notes :** As an amherst resident who will be greatly impacted by this project, I feel it is completely unnecessary. Put this effort where it is needed. Not in this residential area. This would have so many negative implications. Everyone has been able to get back and forth without this. Instead, improve existing systems. Snow removal, added congestion to an already busy area, increased noise from operation and construction are just the beginning of my concerns. I wish this project would be stopped.

**Emails :****Notes :**

**NFTA - RECORD #918 DETAIL****Submission Date :** 10/1/2021**First Name :****Last Name :** Ho**Submission Content/Notes :** Hello,

I am in favor of the LRT alternative for improved transit between Buffalo and Amherst. It would be the best option due to the train having higher capacity, larger vehicles, and contributes less air and particle pollution compared to a BRT alternative. In addition, the LRT extension would be more convenient to use as it will connect directly the existing line without needing to change vehicles or modes.

**Emails :****Notes :**

**NFTA - RECORD #972 DETAIL****Submission Date :** 9/15/2021**First Name :** Denise**Last Name :** Horbowicz

**Submission Content/Notes :** I would like to say something. This is Denise Horbowicz. We have lived on this stretch of the street that will be the above-ground part of the rail and it will be running down the middle of the road where a turning lane exists close to Longmeadow intersection in Niagara Falls Boulevard as I understand it. I was at the last scoping meeting. Anyone who would be coming from Kenmore Avenue heading towards Sheridan, and living on the Tonawanda side, will no longer be able to make a left-hand turn into any of the residential properties that exist on that entire stretch unless they make a U-turn down at an intersection. I'm concerned about the snow removal at the end of our driveway. The snow removal on the sidewalk backing out of my own yard to get into a street to travel in the wrong direction so I can finally turn around to go where I need to go. I believe the noise level will be increased vibrations in the street and I'm wondering where four lanes of traffic reduced down to two lanes of traffic are going to go once the rail exists on this street. Are they going to be on Bailey Avenue in front of the Amherst police department or are they going to be racing down Millersport Highway and doing big circles all around the Town of Amherst to get where they need to go? I really don't believe this is a necessary project and it only benefits UB campus on Main Street to UB on Maple Road. Thank you, and I look forward to hearing what your answers are.

**Emails :****Notes :**

**NFTA - RECORD #971 DETAIL****Submission Date :** 9/15/2021**First Name :** Jeff**Last Name :** Horbowicz

**Submission Content/Notes :** Okay, my comment will be this: I've seen many projects done by our Democratic and political leaders in regards to past projects such as the 33 which now everybody wants to cover up, the present Skyway which everybody wants to take down, or the downtown rail which everybody wants to take down. I think the leadership should take a look at this project and say what they're saying about the 33. Where it divides a community, you're looking at a narrow street, you're looking at expanding the traffic, the snow plow and all types of different things. Already Niagara Falls Boulevard has issues with people getting killed. So, my comment is: put it where we need it - down to the medical corridor. Thank you.

One more additional comment. I'd like the media to take a look at where this ends up on Northtown Plaza (which is dead) and also take a look at the Boulevard Mall during the course of a day and look at the parking lot. This goes nowhere. Thank you.

**Emails :****Notes :**

**NFTA - RECORD #955 DETAIL**

**Submission Date :** 9/28/2021

**First Name :** Jackson

**Last Name :** Hurst

**Submission Content/Notes :** Hi i would like to sign up for project updates regarding the Metro Transit Expansion Project.

**Emails :**

**Notes :**

**NFTA - RECORD #970 DETAIL****Submission Date :** 9/15/2021**First Name :** Simon**Last Name :** Husted

**Submission Content/Notes :** I live in South Buffalo [REDACTED] I'm also a representative of Buffalo Transit Riders United Group that started in 2016. Following cuts we saw from 2012 as a result of the great recession, we're all about improving the transit service where it's most needed. I honestly don't think Amherst is that huge of an area that needs transit service, but I am in support of the project as it is a net positive. I have a friend who lives on the West Side, commutes to Barnes & Noble for a part-time job, and walks 20 minutes to the Metro Rail. It has to connect with the 34 bus. I think it's kind of disingenuous. I love bus rapid transit. I think we need to have more of it. I absolutely like it. We should at least be at the same par with the city of Albany. But to extend our light rail and more of it to a bus rapid transit, it's just like a disservice because, quite frankly, one of the hardest parts about using transit is not how much time we spend on the bus, but also how much time we spend waiting for a bus and to ask people to make a connection between the light rail and the bus rapid transit line is just disingenuous. It would be best to not have any transfers for 14 miles. No needless transfers. We already have all that infrastructure, all the goddamn escalators. We've prepared everything and let's extend it to 14 miles like most light rail systems. Most light rail lines actually go and focus bus rapid transit on areas that truly do need it like Bailey Avenue and Broadway. We could even do something on parts of like South Park. I think areas that just have little service. I hope this seems like we're spending so much time talking about this stuff and not doing anything. Planning, planning, planning but little doing. I hope we can at least turn this around and probably implement this in areas that truly do need bus rapid transit like those neighborhoods I referenced earlier. That's all I have to say. Again, light rail is a far better option simply because people would not needlessly be left waiting for a transfer. Okay, thanks.

**Emails :****Notes :**



**NFTA - RECORD #925 DETAIL****Submission Date :** 10/14/2021**First Name :** Anthony**Last Name :** James**Submission Content/Notes :** One-seat ride between Downtown Buffalo and Amherst, please! Our hope is to one day see the Metro Rail system built out with all the originally planned extensions. To realize this vision, the rapid transit part of the system must be all one mode or it will be exceedingly difficult to ride!**Emails :****Notes :**

**NFTA - RECORD #921 DETAIL**

**Submission Date :** 10/13/2021

**First Name :** Janiece

**Last Name :** Jankowski

**Submission Content/Notes :** I would like to see a continuous 'light rail' solution. To go from Light Rail, to Bus Rapid Transit and back places a hardship on people with disabilities, children, etc. Especially with our winter weather (navigation as well as waiting in elements). Our area has significant older population at this time, which also makes it hard for our seniors.

**Emails :**

**Notes :**

**NFTA - RECORD #926 DETAIL**

**Submission Date :** 10/14/2021

**First Name :** Paul

**Last Name :** Kacprzak

**Submission Content/Notes :** I was a teenager in the 1970s when I attended NFT hearings at Bennet HS in Buffalo to learn about the ENTIRE Metro system including Amherst, Tonawanda , East Side Airport and West Side tracks. Almost 5 DECADES later we are getting comments on expanding Amherst line. Please get start the tracks before I collect Social Security.

**Emails :**

**Notes :**

**NFTA - RECORD #928 DETAIL**

**Submission Date :** 10/14/2021

**First Name :** Paul

**Last Name :** Kacprzak

**Submission Content/Notes :** I was a teenager in the 1970s when I attended NFT hearings at Bennet HS in Buffalo to learn about the ENTIRE Metro system including Amherst, Tonawanda , East Side Airport and West Side tracks. Almost 5 DECADES later we are getting comments on expanding Amherst line. Please start the tracks before I collect Social Security.

**Emails :**

**Notes :**

**NFTA - RECORD #929 DETAIL****Submission Date :** 10/14/2021**First Name :****Last Name :** Kalayci

**Submission Content/Notes :** As a healthcare provider I need the fastest, most reliable means of public transportation available if I am to ride public transportation at all. I wish to do so as a way of doing my part for climate change and the environment, which greatly impact public health. Please add my voice to those who call for extending light rail (not bus of any kind as I my colleagues and I cannot afford the time and hassle it would take to ride buses). Thank you.

**Emails :****Notes :**

**NFTA - RECORD #958 DETAIL****Submission Date :** 10/13/2021**First Name :** Christopher**Last Name :** Klein**Submission Content/Notes :** For a light rail system that has very low ridership couldn't the money be spent on a project that generates something more beneficial..like more airport expansion.**Emails :****Notes :**

**NFTA - RECORD #931 DETAIL****Submission Date :** 9/13/2021**First Name :** Marilyn**Last Name :** Kragbe

**Submission Content/Notes :** Expressed that Buffalo had lost its way after the decline of the steel industry and missed an opportunity to expand. She sees the LRT Build Alternative as an opportunity to help the region progress and achieve the original design of the Metro Rail system to serve other areas of the community beyond Main Street in the City of Buffalo. She expressed her strong support of the LRT option and noted that such an investment in expanded light rail should take precedence over other large community investments such as a new football stadium.

**Emails :****Notes :**

**NFTA - RECORD #944 DETAIL****Submission Date :** 9/15/2021**First Name :** Dan**Last Name :** L

**Submission Content/Notes :** "I moved to Erie county in 2007 and bought a house [REDACTED] in 2011. I have been very happy living in Amherst. However, I find this project to be a disgusting abuse of taxpayer money in a city that needs good paying jobs. Transport down the blvd is on the bottom of the list of issues facing Amherst and Erie County. I drive down NF Blvd numerous times a day and never see more than 10 people on a bus. I do not see any need to destroy a community, local businesses and drive down home values for a few dozen daily riders. Where is the data that anyone will actually pay to ride the metro? How much of the NFTA budget is from revenue and not government subsidies? Where are the residents who will actually pay to ride?"

I believe there is theory and practice. In a large growing metro area this might be a good idea. In a small, car driven Buffalo, it is not needed. I think Buffalo, Amherst and Tonawanda residents should have a vote to see if they think this is needed. Also we need a 20 year cost plan about who will pay. I will need to move out of the area if this is approved. It is sad with the state of Erie county that this is even a discussion. It will only create a few temporary construction jobs and not help our economy. Any stores or businesses in the area will close due to 10 years of construction and gridlock traffic. I think NFTA members should also be forced to relocate to NF Blvd for the 10 years of construction and see the value and destruction of the community. Thank you for your time."

**Emails :****Notes :**



**NFTA - RECORD #964 DETAIL****Submission Date :** 9/15/2021**First Name :** Joseph**Last Name :** Lane

**Submission Content/Notes :** As a resident of the Audubon community and a UB employee I have previously objected to the Metro light rail extension to the two stations beyond UB North Campus due to the added cost to reach a relatively sparse corridor and the additional transit time for train for riders on the remainder of the route. I also remain concerned about, and object to, the negative noise and vibration impacts along the entire aboveground line for the rail including the significant noise and vibration impacts to my own Walton Woods area within the Audubon community.

As the prior NFTA study has shown, now that the federal government has returned the NFTA's proposal for rail asking to consider the bus rapid transit, the key issue to remember when considering the two options is each mode to its best use. That is, which option is more cost effective and efficient to build and operate over the proposed extension and which is more service effective and efficient for the population to be served with the fewest negative impacts. Light rail offers large capacity per vehicle but extension to suburbs from urban core is almost by definition going from higher capacity to lower capacity so rapid bus may be a better option. Bus Rapid Transit offers more flexibility and frequency of vehicles. Will Metro users rather wait 12 to 15 minutes on an open-air platform waiting for the next rail train or wait three to four minutes on the open-air platform waiting for the next rapid bus, especially in the winter? Light rail is projected to require eight to ten years to build out. My understanding is that a Bus Rapid Transit could be operational for the community sooner, perhaps half the time, serving the community sooner rather than later is its own public benefit. I also understand that Bus Rapid Transit costs less per mile to build and operate. If so, bus provides NFTA with more financial options to expand services to other corridors like the Airport and the Southtowns.

Finally, I believe that the surface bus system will demonstrate significantly reduced noise and vibration impacts during the future analyses on all the communities along the entire proposed transit line. Given the extended operating hours from early morning until late at night, this should be among the most significant factors to consider as they have the greatest effect on our quality of life.

Our Amherst Supervisor has his master's degree from UB in urban and regional planning. He knows a thing or two about this topic and he has advocated Bus Rapid Transit as an option to light rail. I certainly favor the Bus Rapid Transit option over the light rail option for the reasons cited here. Thank you for considering these comments.

**Emails :****Notes :**

**NFTA - RECORD #951 DETAIL**

**Submission Date :** 9/21/2021

**First Name :** Donna

**Last Name :** Lanham

**Submission Content/Notes :** "The following are my further comments in response to the 9/15/21 virtual public meeting.

Initially, please note that I stand by the comments made in my 3/20/20 submission via email and incorporate them by reference in this email. I believe the comments were not adequately addressed in the NFTA response. The NFTA simply relied on previous statements in support of the expansion despite the flawed nature of the research and conclusions set forth in the DEIS.

However, if the Metro expansion is to become a reality, I then favor the bus option. The option adequately serves the stated purposes of the expansion while being cheaper to implement and operate, less intrusive on the communities in close proximity to the proposed routes and less likely to disrupt traffic on Kenmore Avenue and Niagara Falls Blvd, including the potential ""cut-through"" traffic on my street trying to avoid the light rail.

Environmental concerns could be addressed with ""clean"" and/or electric buses which the NFTA has already adopted in part."

**Emails :**

**Notes :**

**NFTA - RECORD #932 DETAIL**

**Submission Date :** 10/15/2021

**First Name :** Jesse

**Last Name :** Lee

**Submission Content/Notes :** I see no need for a expansion project! The train is basically empty all day the way it is! Let's put some resources into the millions of pot holes in the streets

**Emails :**

**Notes :**

**NFTA - RECORD #910 DETAIL**

**Submission Date :** 9/28/2021

**First Name :** Domenic

**Last Name :** Licata

**Submission Content/Notes :** I am in strongly in favor of extending rail service along the Audubon corridor, terminating at the 990.

I live in the Audubon community, and would gladly tolerate any minor noise or vibration for the convenience and cost savings of walking or biking to the train and riding it all the way to Canalside.

Great for quality of life, great for the economy, better for the environment.

**Emails :**

**Notes :**

**NFTA - RECORD #969 DETAIL****Submission Date :** 9/15/2021**First Name :** Jim**Last Name :** Louis

**Submission Content/Notes :** I live in the town of Tonawanda by the Ellicott Creek Park area. I am looking forward to having some style of extended system coming out here. I have over 40-plus years in the transportation area. I have gone to places and worked with people in Boston, Newark, Philadelphia, New York, DC and have used all the transportation systems that they have there. I think one of the things that we lose here by being in the suburbs is that loss of not having some type of reliable transportation.

I am happy to see the idea of a park and ride towards the end of Audubon. People like myself would like to go downtown but don't want to make the entire trip downtown either because of the hassle, saving fuel. To be able to go to a park & ride, get on and then head downtown, come back and come to our home.

I grew up in Buffalo also, as one of the other speakers did, right off of Main Street. When all the questions on the original section went on, we were hearing the same items of the blasting problems, the noise you're going to hear, the trains all hours of the night. We never heard those.

I am looking forward to something here either being light rail or a bus system. In Boston, they have a bus system that, of course, runs on electricity on the part of their lines. We need to do something and think a little forward. I understand the people's concern about it running through parts of Audubon but I think some of the concerns could be given a little more explanation and might be able to knock those fears down. Personally, I wish the thing went farther up Niagara Falls Boulevard but I do like the proposal and I hope we see something at least in my lifetime. I thank you for your time.

**Emails :****Notes :**

**NFTA - RECORD #917 DETAIL**

**Submission Date :** 10/1/2021

**First Name :** Scott

**Last Name :** Mercurio

**Submission Content/Notes :** What happened to the original plan for having this business park as the terminus for the line? This would encourage job growth and business expansion here, plenty of room for a Park and Ride lot and would encourage people of East Amherst and Lockport to use the train line.

**Emails :**

**Notes :**

**NFTA - RECORD #938 DETAIL**

**Submission Date :** 9/15/2021

**First Name :** Kathleen

**Last Name :** Mrozinski

**Submission Content/Notes :** Living south of the city we can never use the metro rail. Would be great if snowstorms closed the skyway.

**Emails :**

**Notes :**

**NFTA - RECORD #947 DETAIL****Submission Date :** 9/16/2021**First Name :** Lawrence**Last Name :** Mullen**Submission Content/Notes :** "I am writing to provide feedback on NFTA's proposed rail expansion in Amherst and Tonawanda, as I was unable to attend yesterday evening's virtual meeting.

For reference, I currently live in the Ellicott district in Buffalo, and have done so for the past 11 months; I lived in Amherst for 1.5 years prior to moving to Buffalo. I am a full time graduate student and instructor in the English department at the University of Buffalo, and my office is on the North Campus in Amherst.

When I lived in Amherst, my commute was only 15 minutes by bus, however the bus itself only ran every hour, which often never aligned with when my work day ended, so I was often left waiting for 45+ minutes just to go home. And I never really went downtown in general because it was so impractical and time consuming. Now that I live in Buffalo, my commute is about an hour and consists of 15 minutes on the rail (though I often have to wait 20-25 minutes just for the train to arrive) and an additional 30 minutes or so on the UB Blue Bus which goes between North and South Campus. This has its own problems in that I have to transfer between parts of my commute, and UB's buses are wildly overcrowded especially given COVID-19.

Having one comprehensive rail that extends from Canal-side to beyond North Campus would make my life, personally, leagues better--just in the sense that my commute becomes far easier and manageable. It also would make running any errands I have to do in Amherst easier, as I currently don't have a car. I would strongly encourage you to not make the extension a bus-route only--this would defeat the point of attempting to lower the number of transfers and it would greatly increase the time it takes to get between stops.

UB pays me less than a living wage to work full time (\$24,000 per year), so I don't anticipate ever being able to afford a car, therefore making NFTA my sole means of transportation. I think it's fantastic that NFTA is once again considering a rail extension, it would truly make such a positive impact on so many lives."

**Emails :****Notes :**



**NFTA - RECORD #939 DETAIL****Submission Date :** 9/15/2021**First Name :** Daniel**Last Name :** Nolan

**Submission Content/Notes :** I had a thought of expanding to the bills stadium, but trying to use existing rails. I know that the Buffalo creek railroad has a line goes behind Zittle markets in Hamburg that snakes thru the village and the fair train uses that is close to the stadium and ECC south campus and is still used for Rail road ride into the south especially for fall foliage. I think the line starts in Lackawanna and use to connected to downtown but is not know over the Buffalo creek. Maybe the NFTA could get an agreement with Buffalo creek railroad to use their line and make improvements for them, though a different engine would have to be used, maybe a hybrid railroad engine. This would connect the south towns to the city and sport complex's as well and connect the UB south campus with ECC city and South campus too. You may have to do a bus shuttle from the rail stop to the Bills stadium and ECC south campus though with the new stadium they will be close to each other.

**Emails :****Notes :**

**NFTA - RECORD #940 DETAIL****Submission Date :** 9/15/2021**First Name :** Daniel**Last Name :** Nolan**Submission Content/Notes :** I had an additional thought that the parking at the Stadium could be used during the week then to shuttle people to the Rail stop to work downtown and even for events downtown as well**Emails :****Notes :**

**NFTA - RECORD #941 DETAIL**

**Submission Date :** 9/15/2021

**First Name :** Daniel

**Last Name :** Nolan

**Submission Content/Notes :** "I think again could a shuttle be done from where the Metro rail ends downtown over to Silo city where I think the Rail could start and come out to the south towns.

Just trying to help improve Buffalo and people getting around to events"

**Emails :**

**Notes :**

**NFTA - RECORD #942 DETAIL**

**Submission Date :** 9/15/2021

**First Name :** Gina

**Last Name :** O'Neil

**Submission Content/Notes :** Expressed interest in the Bus Rapid Transit (BRT) option and felt that may be more affordable than a light rail extension. She also mentioned that the BRT option may be more flexible and could be easily extended to other parts of the community such as Williamsville. This would help attract additional riders other than UB students.

**Emails :**

**Notes :**

**NFTA - RECORD #953 DETAIL****Submission Date :** 10/22/2021**First Name :** Amelia**Last Name :** Palka

**Submission Content/Notes :** "I recently saw a poster in the metro telling me that the NFTA was soliciting comments on expanding the Metro Rail to Amherst. I think this is a tremendous idea. I am a UB student and commute to North campus from downtown. It is a gigantic waste of time for me to have to exit the metro rail at University station and get onto a campus bus to get to North. I would much rather stay on the Rail all the way. I love public transport (really public, not private buses for students only).

I understand there is also discussion on whether to have a dedicated bus line or a Metro rail expansion. I 100% think it should be Metro Rail only. The Metro Rail is greener than even the most eco-friendly bus, and it is far more accessible. I hurt my foot the other semester and had to use a cane (now, thankfully, healed), and I much preferred using the Metro and elevators to the rocking and rolling buses. It was a perfectly smooth experience.

Also, the snooty people up in Amherst would complain about buses causing noise and being ugly, while the Metro Rail is underground (at least, the end that's pointed towards Amherst already...) and invisible.

Further, buses are nice, but they also never come on time (ever), while it is nearly impossible for the Metro to arrive off-time for, uh, obvious reasons. (Mainly the fact you can go forward or backward only.)

I very much look forward to this expansion! Indeed, I would also suggest that once this is complete, the Metro make another line that crosses the existing one to make a plus + shape."

**Emails :****Notes :**

**NFTA - RECORD #952 DETAIL****Submission Date :** 9/22/2021**First Name :** Dusan**Last Name :** Palka

**Submission Content/Notes :** Absolutely, this is strong vote for expansion of metro system. The modern city has modern metro systems. I moved to USA from Prague Czech Republic 23 years ago. While there are some system resembling somewhat public transportation it is still heavily limping behind the standards we know from Europe and Buffalo is NOT easy to get by city on public transport front. We should model our systems on either New York City or Bay Area California or even Los Angeles where we lived prior to coming here. Apparently there was once tram on Seneca street all the way to south towns - it is beyond comprehension why that was dismantled. This metro expansion is exactly the public infrastructure that has not been invested in for decades. Please do it.

**Emails :****Notes :**

**NFTA - RECORD #912 DETAIL****Submission Date :** 9/29/2021**First Name :** Benjamin**Last Name :** Pawlik**Submission Content/Notes :** Consider a below-grade track level at the Niagara Falls Blvd and Sheridan Drive intersection to allow trains to bypass a major intersection, and to allow car traffic to be unimpeded by rail traffic, and vice-versa. An example in the Texas Medical Center at the intersection of Fannin and Holcomb shows how rail bypasses a busy intersection. <https://goo.gl/maps/saHTEUc9Ze5ZhFug6>**Emails :****Notes :**

**NFTA - RECORD #913 DETAIL**

**Submission Date :** 9/29/2021

**First Name :** Benjamin

**Last Name :** Pawlik

**Submission Content/Notes :** Consider aligning the rail line on the East side of NF Blvd in this section as it will allow better rail and traffic flow at the curve onto Maple, allow easier access to riders, allow use of land currently unoccupied by buildings, and maintain a greater width of roadway for car traffic.

**Emails :**

**Notes :**



**NFTA - RECORD #914 DETAIL**

**Submission Date :** 9/29/2021

**First Name :** Benjamin

**Last Name :** Pawlik

**Submission Content/Notes :** Maintain a continuity of service along the entire length of the system - in other words, passengers should not be required to change cars or trains for the entire length of the system.

**Emails :**

**Notes :**

**NFTA - RECORD #915 DETAIL**

**Submission Date :** 9/29/2021

**First Name :** Benjamin

**Last Name :** Pawlik

**Submission Content/Notes :** To better support students and access to the community, hours of operation should be extended late into the evenings to allow students to safely travel from downtown to the campus without drinking and driving.

**Emails :**

**Notes :**

**NFTA - RECORD #916 DETAIL**

**Submission Date :** 9/29/2021

**First Name :** Benjamin

**Last Name :** Pawlik

**Submission Content/Notes :** NO BRT! Need to have continuous fast rail service.

**Emails :**

**Notes :**

**NFTA - RECORD #974 DETAIL****Submission Date :** 9/15/2021**First Name :** Karen**Last Name :** Peissinger

**Submission Content/Notes :** I would like to say that although James Gordon is supporting -- and I have a great respect for James Gordon. I also work at University of Buffalo, and he and I have had some email communications about NFTA -- I would like to say that I support the bus rapid transit option over the train option. The reason I say that is that BRT is more flexible with the train. You have a tunnel and you're stuck with that tunnel.

Additionally, I am not convinced that they're going to UB's North Campus. While the ridership might be there, I don't know that you should count on one entity to provide your ridership for such a big undertaking. Bus rapid transit is more flexible. If you find out that the route is not going to work as well. Although there's infrastructure work that has to be done, it's easier to move than a train tunnel. Train tunnels take a long time to build.

I ride the train except for times when we have single tracking like we have right now, which is inconvenient. So, I'm taking the bus. So I'm walking 25 minutes to catch the bus and then I'm walking 10 minutes to my office. So, my commute is an hour and 15 minutes because I live down at the Buffalo River in Old First Ward and there is not adequate bus transportation down here where I live. So, the train has not been my friend. I've been using the bus but that is not as convenient and I think bus rapid transit will provide the convenience. It will provide the flexibility because although the infrastructure is going to be there, it doesn't have to be permanent. I've ridden bus rapid transit in other cities, Seattle, Albuquerque, and those have functioned just fine. So, again, I support bus rapid transit for multiple reasons. I will probably also submit written comments and I would like to thank you for this opportunity to express my opinion. Have a nice evening.

**Emails :****Notes :**

**NFTA - RECORD #909 DETAIL**

**Submission Date :** 9/27/2021

**First Name :** Anthony

**Last Name :** Perez

**Submission Content/Notes :** There can be no allowance made for the noisy construction and operation of a Rapid Transit line adjoining Walton Woods .  
The Audubon residential area was a concept for a model community to be a quiet area with access to nature... with the N.W.Pacific shed architecture of the homes to compliment this connection to nature.  
Many of the HOA residents are original owners who built their homes in 1984 in the quiet woodsy area.  
This is a very bad idea for the local residents ...and violates the original charter of this HOA,

**Emails :**

**Notes :**

**NFTA - RECORD #949 DETAIL****Submission Date :** 9/20/2021**First Name :** Lorna**Last Name :** Peterson

**Submission Content/Notes :** "After listening to the presentation, hearing the comments, and consulting the documents online at NFTA.com, I support rapid bus transit rather than completing the rail line to and through Amherst. I say "completing" rather than "extending" because the original plans were for the rail line to go to Amherst, connecting the two UB campuses. Suburban opposition stopped the original plans and the rail line ended near the City Line. As to "completion" vs "extension," you'll hear the late Rep. Jack Kemp state this in the documentary "Corridor" by the late Pierre McAloon.

It was unsurprising to hear at least two citizens equate train stations and light rail with urban crime. The citizen speakers made pleas to keep urban elements out of the suburbs. It is obvious that the suburbanites do not want light rail in their environment. But this is not the only reason I am supporting bus rapid service/transit, or BRT. Quoting:  
<https://www.transit.dot.gov/research-innovation/bus-rapid-transit>

"BRT contains features similar to a light rail or subway system, it is often considered more reliable, convenient and faster than regular bus services. With the right features, BRT is able to avoid the delays that can slow regular bus services, like being stuck in traffic and queuing to pay on board. See a list of BRT reports and resources." See also:  
<https://www.transit.dot.gov/about/news/us-transportation-secretary-pete-buttigieg-announces-187-million-federal-funding>

Buses may not be glamorous. And they may not be a challenge for transportation engineers to feel pride in mastering, but they work. The citizens of Buffalo need public transit—30% of Buffalo residents do not own a car. I am one of that 30%.; I also have a non-driver DMV ID, so driving is not an option. Public transportation is crucial for many to get to jobs, schools, health care, and shopping. Please propose and create bus rapid transit instead light rail. In the end it will be accepted by the suburbanites and used by those who need public transportation.

The NFTA can barely maintain the current light rail system as it is. Its maintenance is apparently unsustainable as escalators and elevators are frequently out of order, cleanliness of the stations both inside and outside needs greater attention, and beautification efforts are minimal and could stand improvement. With resources so limited, funding competitive, and the suburban support for light rail expansion ranging from tepid to hostile, please select bus rapid transit. Bus rapid transit is economically and politically feasible. Buses operate on already existing public rights-of-way. Expensive, extensive, infrastructure would not need to be built for buses.

Public transit users need reliable, serviceable transit. At this point, the Buffalo-Niagara region needs improved bus service. The time is not right for expanding light rail. Please support bus rapid transit.

I am public transportation dependent, a Metro Monthly pass user, and a supporter of bus rapid transit. Buses are the workhorses of public transportation.  
Thank you for your time and attention"

**Emails :****Notes :**

**NFTA - RECORD #934 DETAIL**

**Submission Date :** 9/13/2021

**First Name :** Laura

**Last Name :** Roberts

**Submission Content/Notes :** I live at [REDACTED] I like the idea of a full tunnel expansion but I am concerned about vibration as it appears it would be near my home both near Kenmore Ave and NF Blvd. Overall, I support its development but would want to have a better understanding of vibration issues.

**Emails :**

**Notes :**

**NFTA - RECORD #927 DETAIL****Submission Date :** 10/14/2021**First Name :** Maria**Last Name :** Russin

**Submission Content/Notes :** I agree with the one-stop bus ride from Amherst/Audubon area to downtown Buffalo for many reasons: environmental - less cars on the road, convenience- easier for the elderly, disabled and anyone who doesn't have time to waste. Also, it will be perfect for the future when the Bills Stadium is downtown. Buffalo is ahead of many cities in everyway except our public transportation. This has to change. Uber and Lyft are great, but are no longer cheap. Many Western New Yorkers cannot afford it.

**Emails :****Notes :**



**NFTA - RECORD #935 DETAIL**

**Submission Date :** 9/13/2021

**First Name :** Kathleen

**Last Name :** Sainsbury

**Submission Content/Notes :** It's all about Amherst....how about rail to the south towns.

**Emails :**

**Notes :**

**NFTA - RECORD #966 DETAIL****Submission Date :** 9/15/2021**First Name :** Robert**Last Name :** Schober

**Submission Content/Notes :** I wish to speak primarily of the section between Kenmore Avenue and Sheridan Drive or the northern end of the upper section. There I operate a business on Niagara Falls Boulevard and I live on Lindale, which is three blocks west of Niagara Falls Boulevard. It's been commented that there will be a single lane northbound and a single lane southbound. Anyone that observes traffic on Niagara Falls Boulevard during many peak times, all four lanes are relatively full and I really question how a single lane in each direction can possibly handle that especially in the morning rush hour and the evening rush hour.

In addition to that, this provides limited access to the residents on the Amherst side if they are proceeding southbound to cross over into their driveways and northbound for the Town of Tonawanda residents as they'll only be able to cross over at the streets as I see it on the outline that has been shown previously.

I do not live on that Boulevard section but I question the distance from the house to the tracks or where the vehicles will be running with the vibration and noise. I would think that would be objectionable.

I do not represent officially the Kenilworth Fire District. I am a previous Chief Officer and a long-time member but we use the Niagara Falls northbound lanes to access a large portion of the Fire District. It is unknown as to how that might affect the operations that we might have there. It would seem to me the only acceptable method for this section would be underground. I realize the cost is much, much higher but it seems the surface would destroy the neighborhood in that particular area. Thank you for the opportunity to comment.

**Emails :****Notes :**

**NFTA - RECORD #930 DETAIL****Submission Date :** 10/14/2021**First Name :** Sean**Last Name :** Slater

**Submission Content/Notes :** Hi dear Nita, I am very excited about the metro rail expansion in Buffalo NY. Can y'all expand the metro rail go to the airport and to the galleria mall. And also to the Buffalo museum and art gallery and also the buff state college. My high school McKinley is also on the same street Elmwood. And also can y'all expand the metro rail to go out to the city of Niagara Falls to go to the Niagara Falls. Can it go to the outlet mall in the city of Niagara Falls too. Thanks again! S.L.S.

**Emails :****Notes :**

**NFTA - RECORD #965 DETAIL****Submission Date :** 9/15/2021**First Name :** Stephen**Last Name :** Steinberg

**Submission Content/Notes :** I want to second Mr. Lane, the guy in Walton Woods in what he had to say and I want to add some of my own. What I have to say, which I think some of the intensity of the opposition is not making it through in some of these comments and that is very disappointing, that so many people have seen is this not a regional issue but one that has become extremely personal. We live out in the suburban area. That was a choice we made to do on lifestyle and now what we have is a group of small -- a small group of people supported by engineers that are trying to repeat the same mistakes that we made with the 33, the Kensington Expressway and with the 198 Scajaquada Expressway and with the 190, the Niagara Thruway.

And it doesn't look like anybody is learning a thing here. There's a problem with listening to people that are opposed that are in the path of your little project. you got a problem in the city of Buffalo, let the city of Buffalo solve it. You got a problem at UB (who everybody doesn't seem to want to mention here). We know who's driving this project: it's UB and UB throws their weight around all over Amherst, and I am sick of it.

The existing bus system that UB has seems to work fine. Why do you want to replace it with a whole other system? I know why: because UB wants to do it on the public dollar. Let UB pay for their own problems.

What else have I got? I got a minute left. I just want to reiterate how much this is a very personal issue. Okay, it's not about regionalism, okay? It's not about regionalism and the CRT (the Carbon Rant Team) that has been out there promoting this thing from all this time is trying to put this on the backs of everybody else. They've got to back off and I'm not going away and I'm not taking "no" for an answer and I'll be there at the next meeting too.

Thank you for having this presentation.

**Emails :****Notes :**

**NFTA - RECORD #936 DETAIL****Submission Date :** 9/14/2021**First Name :** David**Last Name :** Stout**Submission Content/Notes :** I could not find a definition of BRT anywhere in the Expansion Documentation on-line. It should be defined upfront. It's an alternative using some kind of equipment rather than light rail expansion.**Emails :****Notes :**

**NFTA - RECORD #943 DETAIL**

**Submission Date :** 9/15/2021

**First Name :** David

**Last Name :** Stout

**Submission Content/Notes :** I still don't know what BRT means!!! I doubt it really is a secret worth keeping.

**Emails :**

**Notes :**

**NFTA - RECORD #945 DETAIL****Submission Date :** 9/15/2021**First Name :** Karen**Last Name :** Taylor

**Submission Content/Notes :** I would like to formally voice my concern against the NFTA transit expansion. Under no circumstances do I believe the train should go beyond UB North. There is no need to have a train run north on Audubon Parkway. Based on the numbers of riders on the northern most segment of the train, there is no need for a train past UB North. A bus would be sufficient to serve the community. I would hope you do not consider spending my tax dollars in such a thoughtless manner. A train would cause unnecessary light and noise pollution in a residential neighborhood.

**Emails :****Notes :**

**NFTA - RECORD #975 DETAIL****Submission Date :** 9/15/2021**First Name :** Karen**Last Name :** Taylor

**Submission Content/Notes :** So, I live in the Audubon Community and my concern is with the train coming beyond UB campus into the residential community. So I support the bus component of this. I think the light train would cause unnecessary noise and vibration pollution in a residential community. I would hope that if we do this expansion, the train could end at the UB North Campus and not go beyond into the Audubon community to the 990. I think that by the study that was presented in the past, there would be very few riders that would ride the train beyond the North Campus. I think it would be a waste of our tax dollars and it would just disrupt a serene, quiet community and I see no need. So maybe there is an ability to somehow do train between the North and the South Campus and, if we were going to run anything beyond the North Campus, have it be a bus. But my overall opinion would be that we don't need the train expansion at all that it would just be with busing. I think we actually already do have the UB Stampede bus to fulfill the needs of the students from the South to North Campus but my major concern is not to disrupt a residential community beyond the UB North Campus on Audubon past the police station. I think that's it.

**Emails :****Notes :**



**NFTA - RECORD #950 DETAIL****Submission Date :** 9/20/2021**First Name :****Last Name :** University at Buffalo

**Submission Content/Notes :** "As the largest higher education institution and a significant employer in Western New York, the University at Buffalo is pleased to support the NFTA Buffalo-Amherst-Tonawanda Corridor Transit Expansion project. UB has three vibrant campuses which require support from a UB-provided transportation system and the NFTA. We believe that a strong and comprehensive public transportation system will benefit the UB community and all Western New York.

When reviewing the design options for the expansion project, the university has consistently maintained that our primary considerations are ensuring the fastest travel times between our campuses and providing a one-seat ride from Downtown to North Campus. This strategy is consistent with our 2009 Comprehensive Master Plan, which best defines the long-term physical plans for the university. Indeed, this strategy was paramount to our decision to place our \$375 million 2016 Jacobs School of Medicine & Biomedical Sciences (JSMBS) building at Allen and High Streets. Our work to incorporate the existing NFTA metro Allen-Medical Campus Station in the JSMBS building was in the hope that our three campuses would one day be connected by a fast, sustainably powered, weather resilient, one-seat train ride. We look forward to working with the NFTA and FTA on realizing the plans for the Buffalo-Amherst-Tonawanda Corridor Transit Expansion."

**Emails :****Notes :****Attachments :** UB Letter to FTA NOI\_NEPA Scoping Period\_9-23-2021.pdf (232 kb)

September 20, 2021

NFTA Metro

RE: Buffalo-Amherst-Tonawanda Corridor Transit Expansion Scoping Phase Public Response

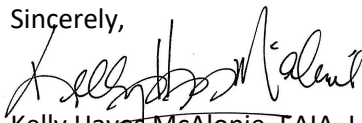
To Whom it May Concern,

As the largest higher education institution and a significant employer in Western New York, the University at Buffalo is pleased to support the NFTA Buffalo-Amherst-Tonawanda Corridor Transit Expansion project. UB has three vibrant campuses which require support from a UB-provided transportation system and the NFTA. We believe that a strong and comprehensive public transportation system will benefit the UB community and all Western New York.

When reviewing the design options for the expansion project, the university has consistently maintained that our primary considerations are ensuring the fastest travel times between our campuses and providing a one-seat ride from Downtown to North Campus. This strategy is consistent with our 2009 Comprehensive Master Plan, which best defines the long-term physical plans for the university. Indeed, this strategy was paramount to our decision to place our \$375 million 2016 Jacobs School of Medicine & Biomedical Sciences (JSMBS) building at Allen and High Streets. Our work to incorporate the existing NFTA metro Allen-Medical Campus Station in the JSMBS building was in the hope that our three campuses would one day be connected by a fast, sustainably powered, weather resilient, one-seat train ride.

We look forward to working with the NFTA and FTA on realizing the plans for the Buffalo-Amherst-Tonawanda Corridor Transit Expansion.

Sincerely,



Kelly Hayes McAlonie, FAIA, LEED AP  
Director of Campus Planning

**NFTA - RECORD #923 DETAIL****Submission Date :** 10/14/2021**First Name :** Tim**Last Name :** van Oss

**Submission Content/Notes :** While the rapid bus option has some merits having to do with lower construction cost, the overall rider experience will suffer greatly. I am a daily user of the system to commute to work or go downtown/allentown to meet with friends. I would not get on a train then transfer to a bus to get to my destination on the same line. I want a single seat from the DL&W terminal to Crosspoint in Amherst. Least amount of friction for your ridership as possible.

**Emails :****Notes :**

**NFTA - RECORD #968 DETAIL****Submission Date :** 9/15/2021**First Name :** Jeanne**Last Name :** Vinal

**Submission Content/Notes :** I'm a legislator from District 5, which encompasses 75 percent of Amherst. I wanted to recognize the prior speakers, Elizabeth Giles, from the Transit Writers United for all the good work they do, and recognize Joseph Lane from the Audubon Community Center for all the work that they do. I'm echoing some of his comments as well as the other speakers.

Our public transportation is vital to our area and the purpose of it should be remembered in this project. It is to allow our neighbors to enter into the workforce and to continue in the workforce. It's to allow access to education including higher education. It's to allow access to the economy, recreation, healthcare and for all our neighbors including those who can't drive or don't wish to drive. And also the purpose of why we invest in public transportation is to grow our economy and to promote safety and to help our environment by reducing negative emissions from alternatives. And it's also in part to provide good union jobs to our community including for the members of the Amalgamated Transit Union.

This project has been considered for such a long time and the cost is so substantial and then, since the time it was first considered, there's been so much change. There's a movement to electric vehicles. So therefore the need for this as stopping emissions is no longer there. There's also been a change since we first started this in the location of retail and schools and jobs and, in COVID, there's a change. Now due to COVID, with the fragility of locally owned businesses, which is mentioned earlier. And a change related to the rider fear of enclosed locations.

My main concern and those of many constituents is the lack of flexibility with either of the two projects that involve the train. Lack of flexibility and that it permanently interferes with intersections. We have our cities divided as was designed on that spoke system and we've lost our circle transportation that joins those folks that go from Amherst down Transit and those types of places.

Like other speakers, I do think that we need more public transportation but we need that in the form of more buses, more structures, more routes and to have those routes be mindful of locations, of jobs locations, of classrooms so that our citizens can utilize those resources and serve the purpose of why we're investing so much into our public transportation. I thank you for the comments and for the people that spoke earlier and for your work on this project. Thanks very much.

**Emails :****Notes :**

**NFTA - RECORD #933 DETAIL**

**Submission Date :** 9/13/2021

**First Name :** Debby

**Last Name :** Williams

**Submission Content/Notes :** I and all my neighbors do not want the metro subway to go down Niagara Falls Blvd. The Blvd is overcrowded now and the sound of police sirens are constantly blaring. It would only get worse if the expansion happens.

**Emails :**

**Notes :**

**NFTA - RECORD #946 DETAIL****Submission Date :** 9/15/2021**First Name :** Tom**Last Name :** Wujek**Submission Content/Notes :** "Thank you for allowing input on the expansion project. I am in support of the rail extension and think it will offer many benefits to the future of the Buffalo area.

The overall alignment of the project I think will be beneficial. Even though the new terminal will be at Muir Woods, I think that the line should also allow for a future provision that allows an extension down Interstate 990 to potentially serve potential stations at North French Rd/I-990 and also in the Crosspoint Office Park. This will provide enhanced service to over 20,000 employees that work in the office park and the surrounding area.

Also as part of the extension, I think that new signaling technologies should be considered to help improve overall efficiencies on the current and future extension of the line. An example that could be considered is Communication Based Signaling Technology (CBTC) which can help provide enhanced operations on the line, real-time location tracking for the trains, and safety enhancements.

Another thing that should be considered is using tunneling for additional portions of the proposed line.

Replacement rail cars should also be considered for this project. A great example of a rail car design that could be very effective is using the P2550 cars built for the Los Angeles Metro system. Those would offer higher capacity being an articulated 90 foot long car instead of the current 66 foot long cars that exist today. A 3 car train with longer 90 foot cars will offer higher capacity than a 4 car train with 66 foot long cars while using the same platform lengths. Combining this with upgrading the existing free fare stations to accommodate level boarding on all cars will provide benefits.

The project should be part of an enhanced regional system where future rail lines that can connect the southtowns, Airport, Niagara Falls, and the Tonawandas. "

**Emails :****Notes :**

**NFTA - RECORD #924 DETAIL****Submission Date :** 10/14/2021**First Name :** Maria**Last Name :** Ziaja**Submission Content/Notes :** To Whom It May Concern:

My friends and I are looking forward to leaving our cars behind on my commute to Amherst. However, if we have to switch from rail to bus, it would take way too long and we would probably just drive. I say this as a young professional who can move through stations pretty quickly— it would take even longer for someone who is less able.

I think it is crucial to make clean transit fast and convenient. Transit planning that requires switching between rail and bus is a disservice to not only those trying to make sustainable lifestyle choices, but also to people in low income groups who cannot afford a car. It is time to make transportation equitable and to incentivize car-free commutes. Having to switch between rail and bus works against this goal, as public transit should not take twice the time and energy as driving. Please, for the sake of our community and planet, consider expanding comprehensive rail that does not require switching to a bus.

Thank you for listening.

**Emails :****Notes :**