

Response to Comments

Contents

Introduction.....	1
1 Response to Public/Agency Comments.....	3
CHAPTER 1: PROJECT DESCRIPTION	7
Purpose and Need.....	10
Alternatives.....	11
Project Description.....	12
CHAPTER 2: LAND USE, ZONING, AND COMMUNITY CHARACTER	16
CHAPTER 3: SOCIOECONOMIC CONDITIONS	17
CHAPTER 4: POTENTIAL PROPERTY ACQUISITIONS AND DISPLACEMENTS	20
CHAPTER 5: COMMUNITY FACILITIES AND UTILITIES.....	21
CHAPTER 6: ENVIRONMENTAL JUSTICE	22
CHAPTER 7: VISUAL RESOURCES	23
CHAPTER 8: HISTORIC AND CULTURAL RESOURCES	24
CHAPTER 9: PARKLANDS AND RECREATIONAL RESOURCES	24
CHAPTER 10: NATURAL RESOURCES.....	24
CHAPTER 11: WATER RESOURCES	25
CHAPTER 12: GEOLOGY, SOILS, AND FARMLANDS	26
CHAPTER 13: TRANSPORTATION	27
Traffic.....	27
Transit.....	29
Parking.....	30
Bicycle and Pedestrian	30
Safety and Security	31
Accessibility.....	32
Ridership	32
Travel Time.....	33
CHAPTER 14: NOISE	33
CHAPTER 15: VIBRATION	38
CHAPTER 16: AIR QUALITY.....	40
CHAPTER 17: ENERGY.....	40
CHAPTER 18: HAZARDOUS AND CONTAMINATED MATERIALS	41
CHAPTER 19: CONSTRUCTION EFFECTS	41
CHAPTER 20: INDIRECT AND CUMULATIVE IMPACTS.....	43
CHAPTER 21: COMMITMENT OF RESOURCES	45
CHAPTER 22: PUBLIC INVOLVEMENT	46
2 Town of Amherst Comments.....	49
EXECUTIVE SUMMARY	49
CHAPTER 1: PROJECT DESCRIPTION	51
CHAPTER 2: LAND USE, ZONING, & COMMUNITY CHARACTER	52
CHAPTER 3: SOCIOECONOMIC CONDITIONS	53
CHAPTER 4: POTENTIAL PROPERTY ACQUISITIONS AND DISPLACEMENTS	54
General Comments.....	54
Partial Acquisitions/Easements.....	54
Full Acquisitions.....	55
CHAPTER 5: COMMUNITY FACILITIES AND UTILITIES.....	55
CHAPTER 6: ENVIRONMENTAL JUSTICE.....	56
CHAPTER 7: VISUAL RESOURCES	57
CHAPTER 8: HISTORIC AND CULTURAL RESOURCES	59
CHAPTER 9: PARKLANDS AND RECREATIONAL RESOURCES	59
CHAPTER 11: WATER RESOURCES	60
CHAPTER 13: TRANSPORTATION	61
CHAPTER 14: NOISE	63
CHAPTER 15: VIBRATION	64
CHAPTER 19: CONSTRUCTION EFFECTS	65

CHAPTER 20: INDIRECT AND CUMULATIVE IMPACTS.....	65
CHAPTER 21: COMMITMENT OF RESOURCES	66
OTHER COMMENTS.....	67
3 Erie County Comments.....	68
4 Federal Transit Administration Comments.....	78
5 New York State Department of Environmental Conservation Comments.....	79
6 New York State Department of Transportation Comments.....	82
GENERAL.....	82
NATIONAL ENVIRONMENTAL POLICY ACT (NEPA), STATE ENVIRONMENTAL QUALITY REVIEW (SEQR) PROCESS, FEDERAL HIGHWAY ADMINISTRATION (FHWA) AND NYS DOT MAIN OFFICE INVOLVEMENT.....	82
OTHER PROJECTS.....	83
CHAPTER 4: POTENTIAL PROPERTY ACQUISITIONS AND DISPLACEMENTS.....	83
CHAPTER 6: ENVIRONMENTAL JUSTICE.....	84
CHAPTER 8: HISTORIC AND CULTURAL RESOURCES	85
CHAPTER 10: NATURAL RESOURCES.....	86
CHAPTER 11: WATER RESOURCES.....	87
CHAPTER 13: TRANSPORTATION	88
Section 13.2.1.....	89
Section 13.3.4, 13.4.4.....	90
Section 13.5.1-Traffic Operations	90
Section 13.5.1.1.....	90
Signalized Intersections along Niagara Falls Blvd (NFB) and Maple Rd.....	91
General Traffic and Safety Concerns.....	94
Section 5.4.3, Appendix F.....	96
CHAPTER 14: NOISE	96
CHAPTER 16: AIR QUALITY.....	97
CHAPTER 17: ENERGY.....	100
CHAPTER 18: HAZARDOUS AND CONTAMINATED MATERIALS.....	101
CHAPTER 19: CONSTRUCTION EFFECTS.....	101
CHAPTER 20: INDIRECT AND CUMULATIVE IMPACTS.....	103
7 Town of Tonawanda Comments.....	105
8 Public/Agency Comments.....	108

Introduction

This report summarizes and responds to comments on the Draft Environmental Impact Statement (DEIS) for the Metro Rail Expansion Project (Proposed Action). The Niagara Frontier Transit Metro System, Inc. (Metro), a wholly owned subsidiary of the Niagara Frontier Transportation Authority (NFTA), released the DEIS on January 24, 2020, and initiated a 60-day public comment period. The public comment period ended on March 24, 2020. To provide additional time for agency review of the DEIS, due to the COVID-19 pandemic and the prevalence of agency employees working remotely, the agency comment period was extended to April 10, 2020. During the public and agency comment period, the Federal Transit Administration accepted the role of lead agency for the Metro Rail Expansion environmental review process.

The public was provided opportunities to submit comments on the DEIS in several ways throughout the comment period. Written comments could be submitted via email, the project website, mail, and/or comment cards provided at the public hearings held for the Proposed Action. Opportunities to provide oral comments in public through a stenographer were available at the public hearings, held on February 25 and February 26, 2020.

Metro would normally respond to public comments received during review of the DEIS and at the public hearing in the Final Environmental Impact Statement (FEIS). However, because of the change in lead agency and conversion of the environmental review from a SEQR to National Environmental Policy Act (NEPA)/SEQR review, the FEIS will be prepared as a follow up to the NEPA/SEQR DEIS.

Metro has prepared this stand-alone document to summarize and respond to the substantive comments received during public review of the SEQR DEIS and the public hearings. These comments have been considered and Metro's responses will be incorporated into the NEPA/SEQR DEIS, as appropriate.

The comments received on the DEIS and responses are organized into the following sections:

- Section 1: Responses to Public/Agency Comments – This section contains summaries of the substantive comments received from the public and agencies and the responses to those comments. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the DEIS. Where more than one commenter expressed similar views, those comments have been grouped and addressed together. Some commenters did not make specific comments related to the proposed approach or methodology for the impact assessments. Others suggested editorial changes. Where relevant and appropriate, these edits—as well as other substantive changes to the DEIS—will be incorporated into the NEPA/SEQR DEIS, as appropriate.
- Section 2: Town of Amherst Comments – The Town of Amherst provided written comments on April 10, 2020. Metro responded to these comments separately from Section 1: Responses to Public/Agency Comments.

- Section 3: Erie County Comments – Erie County provided written comments on April 9, 2020. Metro responded to these comments separately from Section 1: Responses to Public/Agency Comments.
- Section 4: Federal Transit Administration (FTA) Comments – The FTA provided written comments on April 15, 2020. Metro responded to these comments separately from Section 1: Responses to Public/Agency Comments.
- Section 5: New York State Department of Environmental Conservation (NYSDEC) Comments – The NYSDEC provided written comments on March 24, 2020. Metro responded to these comments separately from Section 1: Responses to Public/Agency Comments.
- Section 6: New York State Department of Transportation (NYSDOT) Comments – The NYSDOT provided written comments on April 10, 2020. Metro responded to these comments separately from Section 1: Responses to Public/Agency Comments.
- Section 7: Town of Tonawanda Comments – The Town of Tonawanda provided written comments on April 10, 2020. Metro responded to these comments separately from Section 1: Responses to Public/Agency Comments.
- Section 8: Public/Agency Comments – This section contains the oral comments from the public hearings and copies of the written comments received from the public and agencies.

1 Response to Public/Agency Comments

List of Public/Agency Commenters

Name	Date	Type	Comment/Response Number
Acker, Amanda	2/11/2020	Website	1.3, 3.1, 14.5, 15.2, 22.1
Ackerman, Deborah	2/12/2020	Email	1.1, 1.9
Alabiso, Frank	2/25/2020	Public Hearing	14.5, 15.2
Alabiso, Frank	3/16/2020	Comment Card	14.5, 15.2
Antos, Gabriel	2/9/2020	Website	1.9
Arlotta	1/23/2020	Website	1.2
Barrett O'Neil, Julie M.	3/24/2020	Email	1.1, 6.2, 6.3, 20.3, 22.6
Barton, Ann	2/26/2020	Email	1.2, 13.8, 13.15, 13.19, 14.1, 15.5
Bartus, Darlene	2/27/2020	Email	1.1, 1.9, 13.13
Becker, Bruce	2/25/2020	Public Hearing	1.1
Bennett, Robert	2/20/2020	Website	1.1, 13.1, 13.6, 13.20, 19.1
Biedron, Linda	2/19/2020	Email	1.2, 1.5, 13.14, 21.5
Boes, Melissa	2/10/2020	Website	1.1
Booth, Justin	3/12/2020	Email	1.1, 1.8, 1.10, 1.18, 13.8, 13.12, 13.13
Bosch, Mark	2/19/2020	Letter	1.2, 21.5
Bradfuhrer, Edward	2/26/2020	Website	1.1
Broduehrer, Sean	2/11/2020	Website	1.1
Burmeier, Ann	2/25/2020	Public Hearing	4.1, 5.1, 13.1, 19.4
Busch, Mary	2/10/2020	Website	1.3, 14.5
Cacciotti, Kristen	2/27/2020	Website	14.5, 15.2
Cadzow, Dan	3/9/2020	Website	1.1
Canna, John	2/13/2020	Website	1.2, 21.2
Canna, John	2/13/2020	Website	1.2, 21.2
Chase, Karlen	2/13/2020	Website	1.1
Chazen, Jennifer	2/11/2020	Website	1.1
Cochran, Janice	3/25/2020	Website	3.1, 4.1, 14.3, 22.2, 22.3
Colbert,	3/21/2020	Website	1.3
Colbran, Vanessa	3/3/2020	Email	4.1
Comtois, Mary	3/3/2020	Email	1.1, 1.9, 1.26
Cross, Gail	3/1/2020	Comment Card	4.1, 13.1, 22.3
D, Denise	2/26/2020	Website	1.2, 3.1, 5.1, 13.14
DeMars, Michael	2/13/2020	Website	1.2, 3.2, 4.1, 15.1
DeMars, Michael	3/17/2020	Website	1.2, 4.1, 13.19, 22.1
Dimino, Mark	2/25/2020	Public Hearing	13.11
Donnelly, Catherine	2/10/2020	Website	1.1
Dressel, Chris	2/16/2020	Email	1.1
Dwyer, Michael	2/19/2020	Website	1.1

Name	Date	Type	Comment/Response Number
Enderle, Karen	3/9/2020	Website	1.3
Fabbiano, Stephen	3/9/2020	Website	1.1
Fanning, Doreths	3/11/2020	Website	13.7
Fassbinder, Katie	2/10/2020	Website	1.1
Fildes, Lynn	3/3/2020	Comment Card	1.11, 3.1, 13.2, 22.3
Freer, Jack	2/12/2020	Email	1.1
French, George	2/13/2020	Website	1.1, 1.25
Fruehauf, Tracy	2/25/2020	Public Hearing	1.2, 3.1, 6.2, 13.14, 14.7
Fruehauf, Tracy	2/26/2020	Email	3.1, 13.14
Funke, Doug	2/25/2020	Public Hearing	1.1, 1.3, 1.14, 1.16, 2.3, 3.5, 4.3, 4.4, 6.1, 7.1, 9.1, 10.1, 11.1, 11.2, 11.3, 12.1, 13.10, 13.11, 13.20, 14.5, 14.8, 15.2, 16.1, 17.1, 19.2, 20.4
Funke, Doug	3/22/2020	Email	1.1, 1.9
GIBAS, CHRISTOPHER	3/19/2020	Website	1.1, 1.9
Gifford, Gladys	3/20/2020	Email	1.1, 1.7, 2.1, 3.4, 10.2, 11.4, 16.1, 19.5
Gordon, James	3/22/2020	Website	1.1, 22.5
Gordon, Jim	2/26/2020	Public Hearing	1.1, 22.5
Greene, Ronald	3/10/2020	Website	1.2, 1.3, 14.5, 15.2
Griffith	2/26/2020	Website	1.2, 1.3, 4.1, 15.2
Griffith, Carol	3/24/2020	Letter	1.3, 14.5, 15.2
Hacker, Kate	2/22/2020	Website	1.3, 10.3, 13.8, 14.5
Heath, Christina	2/20/2020	Email	1.2, 1.9, 19.3, 22.1
Heim, Jennifer	2/12/2020	Website	1.2, 3.1, 13.1, 14.2
Henry, Jane	2/12/2020	Email	1.6
Hodur, Darrel	3/5/2020	Comment Card	15.1
Hodur, Darrel	3/4/2020	Comment Card	13.1, 15.1
Horbowicz, Denise	2/26/2020	Website	1.2, 1.9, 1.22, 4.1, 13.2
Horbowicz, Denise	2/26/2020	Public Hearing	13.1, 22.3
Hubbard, Stacy	2/12/2020	Website	1.1
James, William	2/16/2020	Website	22.5
James, William	2/18/2020	Email	1.10
Jameson, Maureen	2/13/2020	Website	1.1, 19.2
Johnson	3/11/2020	Website	1.2, 13.1
Jules	3/21/2020	Email	1.3
Karalus, Richard	2/10/2020	Website	1.1
Karas,	3/9/2020	Website	1.1, 13.13
Kasperek, Eileen	2/19/2020	Website	1.1
Kelly, Carmen	3/10/2020	Email	1.2, 1.4, 1.9, 1.24, 13.2
Knavel, Jerome	2/11/2020	Website	1.9
Knavel, Jerome	3/9/2020	Website	1.9
Koester, Ryan	2/26/2020	Website	1.1
Kowal, David	2/25/2020	Public Hearing	1.2, 1.16, 1.20, 1.25
Krafft, Gabriel	2/6/2020	Email	21.5
Lane, Joseph	2/25/2020	Website	1.9

Name	Date	Type	Comment/Response Number
Lane, Joseph	2/25/2020	Public Hearing	1.3, 3.4, 13.1, 14.6, 15.2
Lane, Joseph	3/12/2020	Email	1.3, 3.4, 14.6, 15.2
Lanham, Donna	3/25/2020	Email	1.2, 2.2, 3.2, 13.1, 20.2
Lannen	2/11/2020	Website	1.2, 2.1, 3.1, 13.1
Lewis, Justin	2/25/2020	Public Hearing	1.2, 13.2, 22.3
Liscavage, William	2/25/2020	Public Hearing	1.2, 15.4, 22.1, 22.2
Malinowski, Marie	1/26/2020	Website	1.1, 13.7
Mann, Judy	2/25/2020	Website	1.21
Margo, Lany	3/9/2020	Website	1.1
Marzec, Diane	2/26/2020	Website	1.2, 1.9, 3.3
Maute, Michael	2/5/2020	Website	1.1
Mazur, Bethany	2/11/2020	Website	1.1
Mecca, J	2/19/2020	Email	21.2
Merzacco, Louis	2/26/2020	Public Hearing	1.1, 21.3
Milligan, Maureen	3/4/2020	Website	1.1
Mirando, Maureen	2/19/2020	Public Hearing	1.19, 13.1, 13.16
Mitchell, Anita	3/23/2020	Email	1.2
Muehlbauer, Michael	3/9/2020	Website	1.1, 1.9, 1.16
Mueller, James	2/26/2020	Website	1.2, 1.3
Mueller, James	3/9/2020	Website	1.2, 13.19
Murphy, Ellen	2/10/2020	Website	1.1
Naber, Thomas	3/1/2020	Website	1.1, 13.13
Nash, Linda	3/24/2020	Email	1.3, 12.1, 22.1
Nerode, Nathanael	2/12/2020	Website	1.1, 1.9
Nerode, Nathanael	3/9/2020	Website	1.1, 1.9
New, Edward	2/25/2020	Website	14.5, 14.7, 15.2
New, Edward	2/25/2020	Email	14.5, 15.2
Nichols, Peter	2/26/2020	Public Hearing	1.9, 1.11, 11.1
No Name	4/1/2020	Comment Card	1.9, 13.1
O'Keefe, Robert	3/23/2020	Website	1.2, 1.9, 1.12, 1.22, 3.3, 4.2, 5.1, 5.2, 13.1
O'Rourke, Susan	2/10/2020	Website	1.1
Patel, Ketankumar	2/10/2020	Website	1.1
Pepi, Anne	2/26/2020	Public Hearing	1.3, 3.3, 13.1, 13.2
Perini	2/11/2020	Website	1.2, 21.4
Pond, E	3/2/2020	Website	1.3, 1.9
Protas, Geri		Letter	1.9
Quiram, Jamey	3/9/2020	Website	1.16
Rebman, Alan	2/25/2020	Email	1.9, 13.1
Reed, Tina	2/10/2020	Website	1.1, 1.4, 21.2
Reichert, Karen	1/27/2020	Website	22.1
Ridenour, Richard	3/4/2020	Website	1.1
Robinson, Sara	2/5/2020	Website	1.1
Sampson, Dave	3/9/2020	Email	1.1, 1.9, 22.3
Sawran, David	3/11/2020	Website	1.1, 1.9

Name	Date	Type	Comment/Response Number
Schaeffer, Dennis	2/13/2020	Email	1.9, 13.20
Schaut, Gary	2/25/2020	Website	1.21
Schimert, Paul	2/26/2020	Website	1.2, 1.3
Schimert, Paul	2/26/2020	Website	1.2, 1.3
Schrum, Janet	2/10/2020	Website	1.1
Schweitzer, Daniel	2/11/2020	Website	1.1
Scott, Wayne	2/25/2020	Public Hearing	1.3, 13.8, 22.6
Simmons, Michele	3/17/2020	Email	1.2
Simpson, Robert	2/26/2020	Website	13.12
Simpson, Walter	2/29/2020	Letter	1.4, 1.14, 1.23
Simpson, Walter	2/14/2020	Website	1.4, 1.14, 1.23, 13.19
Steinberg, Stephen	2/25/2020	Public Hearing	1.2
Stinner, David	2/26/2020	Public Hearing	1.1
Strauss, Joshua	2/24/2020	Letter	5.2, 5.3
Sullivan, Sharon	2/11/2020	Website	1.1, 1.9
T., John	2/10/2020	Website	1.2
Taylor, Karen	2/20/2020	Website	1.2, 1.3, 1.24, 4.1, 14.5, 14.7, 15.2
Taylor, Karen	2/25/2020	Public Hearing	1.3, 14.7
Taylor, Shawn	2/26/2020	Website	1.3, 14.7, 15.2
Thomas, Letitia	2/5/2020	Website	1.1
Tooley, John	2/5/2020	Website	1.1
Tudini, Katie	2/10/2020	Website	1.1
Udin, Susan	2/13/2020	Website	1.1
Voter	2/27/2020	Website	1.2, 1.3
Waterman, Leigh	2/25/2020	Public Hearing	1.1, 1.9, 1.16, 13.2, 14.3, 14.9, 22.3
Weiksnar, John	2/26/2020	Public Hearing	1.21, 13.9
Wells	2/11/2020	Website	14.1
White, Brian	3/4/2020	Website	1.2, 1.10, 13.6, 21.1, 21.3, 21.5
Wujek, Tom	2/17/2020	Website	1.1, 1.9, 1.13, 1.15, 1.17
Zakis, Daniel	2/26/2020	Website	1.1, 13.13, 22.1, 22.5
Zanelotti, Rick	2/14/2020	Website	1.2, 3.1, 13.1, 22.1
Zebrowski, Patricia	4/1/2020	Comment Card	1.19, 1.22, 3.3, 5.1, 13.1, 13.14

CHAPTER 1: PROJECT DESCRIPTION

Comment 1.1 Commenters stated support for the Proposed Action. Beyond the broad and general support for the Proposed Action, many of the comments noted various benefits of the Metro Rail Expansion as well as noting support for specific elements of the Proposed Action.

- An at-grade alignment along Niagara Falls Boulevard
- Connections to the existing Metro Rail and to and between other key places along the corridor
- Accessibility to downtown Buffalo
- Connections to the University at Buffalo campuses
- High ridership levels
- An improved premium transit service
- The Proposed Action would reduce the number of vehicular trips
- The Proposed Action would provide a needed service to transit-dependent populations
- The Proposed Action would improve air quality by taking cars off the road, lessening the emissions that contribute to climate change
- The Proposed Action would be faster and quieter
- The Proposed Action would be easier than dealing with traffic
- The Proposed Action is consistent with current trends of reduced auto ownership in younger generations
- The Proposed Action would provide economic and business benefits, locally and to the region
- The Proposed Action would support transit-oriented development and promote smart growth

Response 1.1

The Proposed Action has been identified for many of the reasons stated above. The Proposed Action, described in detail in Chapter 1 of the DEIS, would expand the existing Metro Rail light-rail transit (LRT) from its current terminus at University Station on the University at Buffalo (UB) South Campus, along Kenmore Avenue, Niagara Falls Boulevard, Maple Road, and Sweet Home Road, through the UB North Campus to John James Audubon Parkway and Interstate 990 (I 990). Ten stations are proposed as part of the 7-mile extension, two of which would contain a park & ride facility—and a light maintenance/storage facility is proposed at the end of the line. The Proposed Action would generally exist within existing roadway right-of-way, as shown in the typical sections. Some portions would be underground, under existing roads.

The Proposed Action would provide an efficient, reliable, and accessible high capacity public transit alternative to the automobile for the towns of Amherst and Tonawanda. LRT remains the preferred mode due to its ability to better meet the project's purpose and need, higher ridership projections, and higher user benefits, including a one-seat ride.

The definition of the Proposed Action is the result of the environmental analysis, feedback from agencies, and the continued involvement of the community. This is true of comments received during the formal comment period, included in this report, as well as continuing outreach and coordination throughout the Preliminary Engineering phase of the project. Throughout the development of the Proposed Action, refinements were made to reduce project impacts, reduce overall project costs, and to maintain a cost-effective project while providing a high-quality system.

Comment 1.2 Commenters expressed overall opposition to the Proposed Action. This does not include those who may oppose a portion of the Proposed Action alignment, which are addressed in Comment 1.3. Among the issues stated for their opposition are:

- The Proposed Action is not needed or justified, for various reasons including car ownership, UB summer break, and low population density in the area
- The Proposed Action is not a good use of tax dollars
- As planned, the Proposed Action will not provide a premium transit service
- The primary beneficiaries of the Proposed Action will be developers and the University at Buffalo
- If built, it will bring unwanted development to the area
- The Proposed Action will further the gentrification of areas and force the displacement of low-income households
- The Proposed Action will damage the natural environment
- The Proposed Action will limit access to homes and businesses
- The Proposed Action will worsen traffic congestion and lower travel times significantly
- The Proposed Action will create safety concerns along the corridor such as where to deposit snow
- The Proposed Action will have noise impacts
- The Proposed Action will have vibration impacts
- NFTA's technical analysis is flawed

Response 1.2

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.

- Comment 1.3 Commenters expressed opposition for the Proposed Action alignment north of the University at Buffalo North Campus. These issues included the following:
- The ridership does not support the extension beyond UB North Campus
 - The Proposed Action's rating for funding through the Federal Transit Administration will be weaker with the portion north of the UB North Campus.
 - The Audubon area is an irreplaceable community with a large number of residents.
 - The introduction of transit will create noise and vibration, hampering the residential community.
 - The Proposed Action will create dangerous traffic conditions for pedestrians.
 - Trains will ruin the ambiance and community character of the neighborhood.
 - NFTA's technical analysis is flawed.

Response 1.3

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. The Proposed Action alignment, including the portion north of the University at Buffalo North Campus, is a collaborative regional effort to provide improved transit service, connect major regional job centers, and promote transit-oriented development.

The Proposed Action would provide service to the Audubon Town Center and the future mixed-used development at Muir Woods that incorporates a park & ride facility. In addition, the I-990 station would include a storage/light maintenance facility that is needed for operation of the Proposed Action.

- Comment 1.4: Commenters supported the Proposed Action only if it is designed in a community- and environmentally-friendly manner and mitigates negative impacts to the greatest extent possible.

Response 1.4

The Proposed Action is being planned and designed in accordance with all local, state, and federal laws and regulations. These regulations, including the State Environmental Quality Review Act (SEQR) and National Environmental Policy Act (NEPA), set out specific criteria for environmental and social impacts and how they are to be avoided and/or mitigated against. Respective jurisdictional agencies have been and will continue to be consulted throughout the development of the project. The DEIS discusses the potential environmental effects that could be expected to occur with the construction and operation of each alternative. The DEIS chapters summarize these impacts, while providing further detail within the associated appendices.

Purpose and Need

Comments 1.5: Commenters expressed disagreement with the purpose and need for the Proposed Action.

Response 1.5

NFTA has considered these objections, but finds that the purpose and need as expressed in Chapter 1 of the DEIS is appropriate for the Proposed Action. The purpose of the Proposed Action is to provide a fast, reliable, safe, and convenient transit ride in the Metro Rail Expansion corridor, linking established and emerging activity centers along the existing Metro Rail line in Buffalo with existing and emerging activity centers in Amherst and Tonawanda. This purpose is based on the need to address mobility and accessibility issues in the corridor. Changing land use patterns, as well as future transit-oriented development initiatives, in Amherst and Tonawanda have created activity centers in the corridor resulting in more suburb-to-suburb travel. Please refer to Chapter 1, Project Description of the DEIS for more details on the Proposed Action's Purpose and Need.

An estimated ridership of 30,438 would use the Proposed Action each day by the year 2040, and for them it would provide a faster and more reliable transit alternative than exists today. The number of people and jobs in the area is growing and more people are traveling north-to-south and vice versa. The existing roads are highly congested, and commuting times continue to increase. The existing bus services are unreliable and slow. It is difficult and time-consuming to get from many parts of the corridor to Metro Rail. The Proposed Action would also provide a direct link to the University at Buffalo campuses. There is a large population in the area that relies on transit, and there are many residents who choose to take transit instead of driving.

Comment 1.6: A commenter questioned how the Proposed Action will benefit to the town of Tonawanda.

Response 1.6

The Proposed Action would improve livability by increasing mobility and accessibility in communities throughout the Proposed Action corridor. In addition, the Proposed Action would improve transit connections to/from Buffalo, Amherst, and Tonawanda, and support redevelopment and other economic development opportunities. A substantial body of literature has shown that transit-adjacent locations have higher residential property values as compared to areas with similar characteristics located further from transit stations. Commercial properties, particularly office buildings, also experience a transit value premium. These benefits would be realized along the existing Metro Rail corridor, as well as the Proposed Action alignment in both Amherst and Tonawanda.

Comment 1.7: A commenter stated that the DEIS should document the significant population of transit-dependent commuters in the service area to show that current riders of the

Niagara Falls Boulevard bus would benefit from the light-rail extension, including those who need daily access to downtown Buffalo.

Response 1.7

The Proposed Action was evaluated for levels of transit dependency to better visualize transit needs. The study area for this analysis is defined as ¼ mile from the Proposed Action's alignment and ½ mile from proposed stations. The transit dependency index (TDI) was calculated using the following formula:

$$\text{TDI} = \text{Population Density} \times (\text{housing units without a vehicle} + \text{senior citizens} + \text{children ages 18 and under} + \text{individuals below poverty})$$

The results of the TDI relative to the study area were grouped into four categories: very low, medium, high, and very high, as presented in Chapter 1, Project Description of the DEIS. The populations with the highest dependency are in the northern and southern sections of the study area north of both UB campuses.

The lack of quality transit service in the corridor involves both residential origins and key trip destinations, including work and other trip purposes. The study area has many senior-living complexes, facilities serving disabled persons, low-income housing complexes, apartment complexes, and student housing. The current Metro Rail and Metro Bus routes serve some but not all of these locations.

Comment 1.8: A commenter stated that the goals and objectives stated in Table S-1 should explicitly state that overall total Vehicle Miles Traveled (VMT) are reduced by the LRT.

Response 1.8

The goals and objectives are directly linked to the purpose and need statement and focus on related transportation, economic, and environmental issues. Any revisions to the purpose and need will be reflected in the future NEPA/SEQR environmental document.

Alternatives

Comment 1.9: Commenters supported alignments or options not included in the Proposed Action and/or suggested alternative routes or configurations. This includes preference for Bailey Avenue, tunnel alternatives for all or part of the alignment, support for alignments or options not included in the LPA, different termini, and other alignments/configurations, including service to the Buffalo Niagara International Airport and the southtowns.

Response 1.9

The Locally Preferred Alternative was identified through an iterative process that included stakeholder feedback. The Amherst-Buffalo Alternatives Analysis (AA) was initiated by NFTA in the fall of 2012 along with Greater Buffalo-Niagara Regional Transportation Council to evaluate a range of high-quality transit service alternatives. A 3-step evaluation was conducted, with input from stakeholders.

After reviewing the technical results of the Amherst-Buffalo AA and considering feedback from the Project Steering and Advisory Committees and the public, NFTA recommended the Niagara Falls Boulevard LRT Alternative as the strongest alternative to advance as the Locally Preferred Alternative (LPA).

Following the Amherst-Buffalo AA, the adoption of the original LPA in the fiscally constrained Transportation Improvement Program, and a subsequent transit-oriented development (TOD) study, NFTA 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, from University Station, the alignment would travel 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.

Extensions to the LPA or other LRT alignments may be considered in the future, as a separate effort.

Comment 1.10 Commenters stated that NFTA should consider an expanded and improved bus service or Bus Rapid Transit (BRT) in lieu of the current LRT recommendation in order to satisfy mass transit objects in a more cost-effective manner.

Response 1.10

Bus rapid transit (BRT) was analyzed during the Amherst-Buffalo Alternatives Analysis (AA). After reviewing the technical results of the AA and considering feedback from the stakeholder committees and the public, NFTA recommended light-rail transit (LRT) as the mode to advance as the Locally Preferred Alternative. As per request by the Federal Transit Administration, NFTA will reevaluate BRT as part of the environmental review process, comparing BRT to the No Action Alternative and LRT.

Project Description

Comment 1.11: A commenter asked for clarification on the locations where the Metro Rail transitions from underground to at-grade.

Response 1.11

The Proposed Action alignment would begin at the existing University Station and travel underground eastbound, then loop westbound at the intersection of Main Street and Kenmore Avenue. The alignment would shift west and then make a turn north from Kenmore Avenue onto Niagara Falls Boulevard. The Proposed Action alignment would continue underground on Niagara Falls Boulevard until emerging from a portal near the intersection of Kenilworth Avenue, where the alignment would be above ground along the median. The Proposed Action could be at-grade for the remainder of Niagara Falls Boulevard and Maple Road and

transition underground in front of Sweet Home Middle School. The alignment would continue underground, through the intersection of Maple Road and Sweet Home Road and emerge from a portal on the west side of Sweet Home prior to the I-290 bridge. The remainder of the alignment would be at-grade.

Comment 1.12: A commenter stated that with raised rail the ability to make left-hand turns would be very limited, and access to homes and business would be restricted.

Response 1.12

Movements across the tracks would be permitted at signalized intersections. This is a safety mechanism to reduce the potential for unsafe left-turn or through movement in conflict with the Metro Rail. At signalized intersection locations, left-turn phases would be protected-only. This operational adjustment serves the same purpose: to inhibit motorists from interacting with the Metro Rail in an unsafe manner. The Proposed Action would not eliminate access to homes or businesses.

Comment 1.13: Commenters suggested using a light-weight catenary system to lower costs or upgrading from 650 VDC overhead current to 1500 VDC overhead current to reduce the number of substations needed, increase rail traffic capacity, and decrease energy loss.

Response 1.13

At this time, NFTA has no plans to upgrade the existing catenary VDC current.

Comment 1.14: Several people commented on the size and design of light-rail vehicles as they pertain to the surrounding area's character. One commenter suggested purchasing cars large enough to accommodate peak loads of traffic such as during sporting events.

Response 1.14

Comment noted. The Proposed Action assumes the purchase of a new vehicle fleet prior to operation. The final selection of LRT vehicles will consider community character and ridership projections.

Comment 1.15: A commenter proposed alternatives names for the Proposed Action stations.

Response 1.15

The Proposed Action station names are conceptual and will be determined during final design. The commenters suggestions will be taken into consideration.

Comment 1.16: Comments were received on the location of the stations – noting that they are either too far or too close in proximity. Suggestions for alternate station locations were made. A commenter suggested that the Boulevard Mall station be moved to within the current mall property entirely to further reduce traffic queuing and wait times as well as increase rider safety by eliminating the need to cross traffic lanes to reach the platform. A commenter stated concern that the Ellicott Complex

station would force pedestrians to cross the busy intersection of JJ Audubon Parkway and the traffic circle and will lead to accidents and traffic jams at peak periods.

Response 1.16

Station locations were determined based on ridership, geometric constraints (stations need to be located on straight sections of track), and accessibility while trying to reduce impacts to surrounding homes, businesses, and environmental resources.

Comment 1.17: A commenter stated that all new stations be high level platforms for the entire train length (280 feet long platforms) to allow people who have disabilities or mobility impairments to board more easily.

Response 1.17

All stations would have level boarding to be American with Disabilities Act (ADA) accessible. Platforms are planned to be approximately 300 feet long to accommodate the Metro Rail vehicles.

Comment 1.18: Commenters suggested that stations should serve as mobility hubs that make it easy for customers to change modes seamlessly.

Response 1.18

Stations are being designed to accommodate transfers and provide a pleasant patron experience. Proposed stations would be well lit and attractive; made of durable, low maintenance materials; and include communications including next train information, ticket vending machines, and safety and security coverage.

Comment 1.19: Commenters questioned the park & facility locations, including whether the Boulevard Mall Station park & ride is still possible given that the Boulevard Mall property was recently sold and whether the I-990 Station park & ride will be available to Metro Rail riders in the surrounding neighborhoods and not only the for residence of the new mixed-use development.

Response 1.19

NFTA has and will continue to coordinate with the developer for the Boulevard Mall property. The Proposed Action park & ride facilities would be available to all Metro Rail riders, not only the residence of the mixed-use development.

Comment 1.20: Commenters stated concern for removing one lane along Niagara Falls Boulevard.

Response 1.20

The Proposed Action would repurpose one travel lane in each direction to allow space for the Metro Rail to operate in the median. In addition, a bicycle lane would be incorporated in both the northbound and southbound directions. Signal preemption at signalized locations would ensure that any traffic on the Metro Rail

track is given time to clear the area with the signal dwelling in a non-conflicting phase when the train arrives. This preemption scheme ensures that the Metro Rail would never stop at intersections, while satisfying the vehicular demand in at least one direction while the light-rail passes. In addition, operational improvements, such as bus pull out zones, right-turn-only lanes, and left-turn bays would improve traffic operations. Based on the traffic analysis, the Proposed Action would not result in adverse traffic impacts, including intersections along Niagara Falls Boulevard, during the weekday AM peak hour, weekday PM peak hour, or Saturday Midday peak hour.

Comment 1.21: Commenters requested paving of the Peanut Line Bike Trail.

Response 1.21

NFTA is aware of the efforts to convert the Canandaigua-Niagara Falls Railway, (Peanut Line) into a multi-use trail for pedestrians and bicyclists and will continue to coordinate with the Town of Amherst on the status of the project. During preliminary and final design, design modifications will be incorporated, as necessary, to accommodate improvements to the Peanut Line.

Comment 1.22: Commenters expressed concern on how the Metro Rail would reduce the space for right-of-way space used for snow removal/storage.

Response 1.22

The Proposed Action conceptual engineering includes right-of-way for the snow removal and storage. In addition, the proposed stations provide space for snow storage.

Comment 1.23: A commenter stated that the train schedules at University Station should be coordinated.

Response 1.23

The Proposed Action train schedule will be coordinated with the existing Metro Rail service.

Comment 1.24: Commenters stated that the travel time of 44 minutes is too long.

Response 1.24

The estimated travel time from the proposed I-990 Station to University Station would 21 minutes. The existing Metro Rail travel time from University Station to the Erie Canal station is 21 minutes, for a total of 44 minutes. This same trip taken by existing transit services (Metro Bus and Metro Rail) would be one hour and 19 minutes and would require a transfer. The Proposed Action would provide a high-quality transit and eliminate the need for transfers at University Station.

Comment 1.25: Commenters stated concern related to the cost for service and increased Metro Rail fares. One commenter noted that if the cost per ride for a new light-rail service is

more than it costs to use an existing student blue bus, it would be less appealing to students.

Response 1.25

The cost for the Proposed Action would be consistent with NFTA's current Metro fares, which includes full fares and reduced fares for children, seniors, and disabled or Medicare riders. Fares can be purchased as a standard fare, day or multi-day passes, or monthly pass.

As described in Appendix G, Travel Demand Forecasting of the DEIS, ridership forecasts for the Proposed Action were developed using the Federal Transit Administration (FTA) Simplified Trips-on-Project Software (STOPS). The STOPS model considers the impact that fare policy has on the desirability of transit services.

Comment 1.26: A commenter suggested that NFTA consider targeted advertisement on the potential savings of using rail service and programs to support employees such as a guaranteed ride home.

Response 1.26

Comment noted. The NFTA's Public Affairs office works to communicate with and engage the public and stakeholder about the services that NFTA provides and to promote transit use.

CHAPTER 2: LAND USE, ZONING, AND COMMUNITY CHARACTER

Comment 2.1: Commenter stated that residential properties should be considered and adverse effects of the Proposed Action on the existing neighborhoods should be acknowledged in detail.

Response 2.1

The Proposed Action is being planned and designed in accordance with all local, state, and federal laws and regulations. These regulations, including the State Environmental Quality Review Act (SEQR) and National Environmental Policy Act (NEPA), set out specific criteria for environmental and social impacts and how they are to be avoided and/or mitigated against. Respective jurisdictional agencies have been and will continue to be consulted throughout the development of the project. The DEIS discusses the potential environmental effects that could be expected to occur with the construction and operation of each alternative. The DEIS chapters summarize these impacts, while providing further detail within the associated appendices.

Comment 2.2: Commenters expressed concerns for the trend in student housing and absentee landlords, which has resulting in a deterioration of the neighborhood.

Response 2.2

The NFTA and Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) have discussed concerns regarding the preservation of affordable and low-income housing with both the towns of Amherst and Tonawanda. Following is a summary of the progress each town has made regarding affordable housing in the Proposed Action study area:

- A number of public assistance programs, including home and business improvement subsidies and public infrastructure funding, are in place in Erie County, through the Amherst-Cheektowaga-Tonawanda HOME Consortium, to address priority needs related to affordable housing, economic revitalization and public services.
- Land use and zoning decisions made by the towns also may affect the stock and affordability of local housing. NFTA and GBNRTC support appropriate development around stations but will continue to work with the towns, stakeholders, and local advocacy groups to identify and suggest policies to address this issue.

Comment 2.3: Commenters stated that the DEIS should explain how Muir Woods is currently used and describe anticipated environmental impacts.

Response 2.3

Chapter 2, Land Use, Zoning, and Community Character has been updated with a description of Muir Woods and the anticipated environmental impacts associated with the mixed-used development and the Proposed Action.

CHAPTER 3: SOCIOECONOMIC CONDITIONS

Comment 3.1: Commenters expressed concern that the Proposed Action will result in decreased property values and disagreed with the statements that the Proposed Action will result in increasing property values, citing that the comparisons to other cities, as noted in Chapter 3 of the DEIS, are not appropriate.

Response 3.1

NFTA conducted a review of the academic literature on the property value impacts around stations associated with proximity to high-quality transit lines, including light-rail transit (LRT). Key findings from the literature review are as follows:

- There is a clear consensus from the literature that properties located near high-quality transit stations experience a property value premium in both fast- and slow-growing regions. Both residential and commercial properties experience a transit value premium.

- The value premium for residential properties near transit stations tends to be between zero and 10 percent, although some studies find the premium to be considerably higher.
- Based on the available research, the extent of the area around transit stations that experience property value premiums may be smaller in slower-growing regions than in faster-growing regions. In faster-growing regions property value premiums are often observed as far as three miles away from stations, while in slower-growing regions the property value premiums typically extend up to one quarter of a mile from stations.
- Transit appears to have the greatest positive impact on property values when the transit system significantly improves households' access to employment centers and other key destinations. By connecting downtown Buffalo and outlying suburban areas with the University at Buffalo, the Metro Rail line could have a significant impact on property values.
- Other factors that will be important for maximizing the benefits of the transit investment include supportive land use policy and well-designed station area connectivity. The literature suggests that station areas which are zoned for higher intensity uses tend to see higher property value premiums. Similarly, transit stations that have good pedestrian connections in walkable neighborhoods or good vehicular station access in more automotive-oriented neighborhoods are likely to have higher property value premiums.

Comment 3.2: A commenter stated that the Proposed Action will worsen the housing shortage and lack of affordable housing.

Response 3.2

The NFTA and Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) have discussed concerns regarding the preservation of affordable and low-income housing with both the towns of Amherst and Tonawanda. Following is a summary of the progress each town has made regarding affordable housing in the Proposed Action study area:

- A number of public assistance programs, including home and business improvement subsidies and public infrastructure funding, are in place in Erie County, through the Amherst-Cheektowaga-Tonawanda HOME Consortium, to address priority needs related to affordable housing, economic revitalization and public services.
- Land use and zoning decisions made by the towns also may affect the stock and affordability of local housing. NFTA and GBNRTC support appropriate development around stations but will continue to work with the towns, stakeholders, and local advocacy groups to identify and suggest policies to address this issue.

Comment 3.3: Commenters expressed concern that Proposed Action will have an adverse impact on businesses along the corridor.

Response 3.3

Pedestrian and vehicular access to businesses along the Proposed Action alignment would be minimally affected by the Proposed Action operations. Vehicles turning left on Niagara Falls Boulevard may have to drive an additional distance to the nearest signalized intersection and make a U-turn. Most businesses would experience positive impacts from increased access to transit and transportation options provided by the Proposed Action. In addition, the Metro Rail Expansion is part of a regional comprehensive transit-oriented development planning effort led by NFTA and Greater Buffalo-Niagara Regional Transportation Council, which could result in enhanced opportunities for businesses.

Comment 3.4: Commenters expressed concerns that transit-oriented development strategies for economic growth are inappropriate for the portion of the corridor along Audubon Parkway.

Response 3.4

The Metro Rail Expansion project is part of a regional comprehensive transit-oriented development (TOD) planning effort led by NFTA and Greater Buffalo-Niagara Regional Transportation Council (GBNRTC). In 2016, GBNRTC the comprehensive TOD planning effort that included developing TOD typologies for various station areas and using a Desirability & Readiness Assessment for identifying which Metro Rail station areas had the greatest potential for stimulating TOD. Recognizing that stations vary significantly in function, character, physical form, and market potential, the Comprehensive TOD study developed station typologies. These station typologies were based on the current character of the neighborhood, a reasonable expectation of what character the station area could take on and how the station area would function, how the physical form would be shaped, and what the market potential is for TOD. The current Phase II TOD study will further develop the recommendations and strategies set forth in the 2018 Comprehensive TOD Plan and set the stage for continued advocacy and implementation of TOD strategies along the Metro Rail corridor – existing and proposed expansion. NFTA and GBNRTC will continue to work with representatives from the City of Buffalo and towns of Amherst and Tonawanda, as well as housing and development stakeholders to ensure that future economic growth fits the surrounding community.

Comment 3.5: A commenter noted that Chapter 3 supports the Proposed Action, stating that the Proposed Action will be most attractive to and serve 15 to 19 and 20 to 24-year-old age groups, which constitute the largest groups in the study area.

Response 3.5

Comment noted.

CHAPTER 4: POTENTIAL PROPERTY ACQUISITIONS AND DISPLACEMENTS

Comment 4.1: Commenters expressed concern about right-of-way impacts on private property, especially associated with the Proposed Action alignment along Niagara Falls Boulevard; the potential for residential and business displacements and fair market compensation to the owners.

Response 4.1

The Proposed Action was developed to minimize impacts to private property; however, some displacements will be necessary, as shown in Chapter 4, Potential Property Acquisitions and Displacements of the DEIS. NFTA will coordinate with affected property owners and tenants to develop means to avoid or minimize property acquisitions and displacements. Potential Property Acquisitions and Displacements, property acquisition activities, including relocations, would be performed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) as amended and Federal Transit Administration Circular 5010.1D, Grants Management Requirements and all applicable New York State laws that establish the process through which NFTA may acquire real property through a negotiated purchase or through condemnation.

Comment 4.2: Commenter expressed concern over a partial property acquisition citing a lack of sufficient property area to conduct business should any partial acquisition occur.

Response 4.2

As described in Chapter 4, Potential Property Acquisitions and Displacements of the DEIS, the identification of affected properties is based on the current level of the conceptual engineering plans for the Proposed Action. Properties that could be fully or partially acquired, or would be subject to an easement, were identified based on the Proposed Action limits of disturbance boundary. The limits of disturbance is the boundary within which construction would occur. In many locations, the limits of disturbance also includes a buffer to provide a conservative approach in identifying potential right-of-way needs. Property acquisitions will be further refined during preliminary and final design. Further refinement and discussions with property owners could result in less acquisition than identified in this DEIS. Geographic Information System databases obtained from Erie County were used to graphically depict parcel-level data and identify potential affected properties.

For partial acquisitions, a determination was made whether acquisition would affect the use of the property as currently designed and/or whether modifications to the property would be required to maintain use.

Comment 4.3: Commenter stated that the DEIS should discuss the Boulevard Mall new developer's willingness to accommodate the Proposed Action right-of-way on their property should the project continue to progress.

Response 4.3

NFTA has and will continue to coordinate with the developer for the Boulevard Mall property. The Proposed Action's design will be accounted for in the mixed-used development plans for the mall property.

Comment 4.4: Commenter stated that the DEIS should discuss the property acquisition needed at Muir Woods for the park & ride facility and the train staging and washing facility.

Response 4.4

NFTA has and will continue to coordinate with the developer for the Muir Woods property. The Proposed Action's design will be accounted for in the Muir Woods Development.

CHAPTER 5: COMMUNITY FACILITIES AND UTILITIES

Comment 5.1: Commenters expressed concern about the safety of the Metro Rail in communities, particularly for pedestrians. Commenters expressed concerns related to the proximity of Sweet Home Middle school and the safety of student pedestrian traffic.

Response 5.1

The Proposed Action is being designed to be a safe and efficient system. Special attention has been given to situations where traffic shares, is adjacent to, or crosses the transitway. Safety measures will include signing, signal phasing and coordination, the addition of turn lanes, and the inclusion of curbs, barriers, and gates, as appropriate. Pedestrian and bicycle enhancements are also included throughout the Proposed Action corridor. The Proposed Action would provide safe pedestrian crossings at each signalized intersection that would be well marked and delineated, pedestrian signal indicators, and gates and signals. New trail and sidewalk connections are included, as well as bicycle lanes along certain roadways. In addition, speeds will be limited in areas of high pedestrian activity such as on the UB North Campus. Stations have been designed with safety in mind and have been located in areas with activity and nearby development. Station access will be well marked, safe, and convenient, and stations will be monitored by closed circuit television.

Specifically at the Sweet Home Station across from Sweet Home Middle School, NFTA met with Sweet Home School District to discuss traffic circulation and access. The Proposed Action conceptual design includes a dedicated left turn lane into the eastern access point to ensure traffic circulation continues to operate as it currently operates. Sidewalks are provided along both sides of Maple Road.

Comment 5.2 Commenters expressed concern that the Metro Rail would increase the response time of emergency response providers.

Response 5.2

NFTA has and will continue to coordinate with emergency service providers within the study area. Through this coordination, emergency service providers have indicated the potential to reroute emergency access plans and that the Proposed Action would not result in an adverse impact to emergency services. Emergency services will be considered under the Proposed Action during preliminary and final design and a Preliminary Hazard Analysis will be conducted during preliminary design to further investigate and identify emergency service needs. In particular, vertical clearances for emergency vehicles would need to be assessed when designing catenary structures.

Comment 5.3: The Kenilworth Fire District requested a meeting with NFTA to discuss impacts of the Proposed Action on emergency response.

Response 5.3

In May 2019, members of the project team met with local fire department personnel to discuss potential impacts on emergency response. Attendees included Kenilworth Fire Chief Jeremiah Gersitz, Brighton Fire District Commissioner Robert Sanford and Second Assistant Chief Mike Curry, and Town of Amherst Director of Emergency Services James Zymanek. Topics discussed included emergency vehicle size and operations in the corridor with light rail, snow removal, catenary voltages and other issues. An additional meeting with local emergency responders was planned for March 2020, but was cancelled due to the COVID-19 pandemic. Additional opportunities for emergency response personnel to receive information and provide input on the project will be provided.

CHAPTER 6: ENVIRONMENTAL JUSTICE

Comment 6.1: A commenter noted that Chapter 6 could be improved by noting that the Proposed Action will be atypical in that it will primarily serve public university students with low and no-income and diverse ethnic backgrounds rather than commuters going to and from work.

Response 6.1

Comment noted. Information will be added to a future environmental document to describe the fact that students will be among the new riders. The Proposed Action is anticipated to serve a range of new riders, not only students. The purpose of the Proposed Action is to provide a fast, reliable, safe, and convenient transit ride in the Metro Rail Expansion corridor, linking established and emerging activity centers along the existing Metro Rail line in Buffalo with existing and emerging activity centers in Amherst and Tonawanda. The extended transit line would provide transit service to and from key activity centers in the Proposed Action corridor by providing a time-efficient transit option connecting and serving key

destinations in the corridor (i.e., UB campuses, BNMC, the Buffalo central business district, business parks, and the Buffalo waterfront, among others).

- Comment 6.2: A commenter noted that the Proposed Action must be equitable and the benefits of the project, including transit-oriented development should benefit low income and minority residents, resulting in affordable housing.

Response 6.2

The Proposed Action supports future plans for increased development in the study area that would result in an increase in population, housing, and employment. The Metro Rail Expansion is part of a regional effort to promote transit-oriented development (TOD) along the Metro Rail corridor – existing and proposed. Regional TOD planning efforts are focused on equity. The Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) and NFTA are performing a housing assessment on vulnerability to displacement and opportunities and challenges for affordable housing development. Based on this assessment, GBNRTC and NFTA will recommend tools and resources that that cities and the region can use to support affordable housing development and reduce the risk of displacement in conjunction with TOD.

- Comment 6.3: A commenter noted that the existing Metro Rail has resulted in structural and institutional racism and disinvestment in neighborhoods along the corridor.

Response 6.3

Comment noted. The purpose of the Proposed Action is to provide a fast, reliable, safe, and convenient transit ride in the Metro Rail Expansion corridor, linking established and emerging activity centers along the existing Metro Rail line in Buffalo with existing and emerging activity centers in Amherst and Tonawanda. This will provide new mobility to underserved populations who lack travel options today.

CHAPTER 7: VISUAL RESOURCES

- Comment 7.1: A commenter stated that Figure 7-1 in Chapter 7, Visual Resources of the DEIS inaccurately describe the area north of I-990 as “Suburban Office/Residential district.” This area is a North American hardwood forest with water retention ponds for I-990 and Ellicott Creek flood prevention. There is no illustration of the area north of I-990. The DEIS should include pictures of the retention ponds and the forest.

Response 7.1

The visual assessment will be updated in the future NEPA/SEQR environmental document to describe the area north of I-990, including photos. NFTA will continue to coordinate with the developer and include any available renderings of the mixed-used development.

CHAPTER 8: HISTORIC AND CULTURAL RESOURCES

No public comments were submitted for this chapter.

CHAPTER 9: PARKLANDS AND RECREATIONAL RESOURCES

Comment 9.1 Commenter noted that the Parkland and Recreational Resources chapter is missing mention of Muir Woods.

Response 9.1

As described in Chapter 9, Parkland and Recreational Resources, open spaces and recreational resources in the chapter are identified as publicly accessible areas that can be regularly utilized by the community—including during designated periods—for active or passive recreation. Publicly accessible open spaces can be under government control or owned by a private entity so long as public access to the property is allowed. Muir Woods does not meet this definition as it is not publicly accessible.

CHAPTER 10: NATURAL RESOURCES

Comment 10.1: A commenter stated that Chapter 10, Natural Resources is missing mention of Muir Woods.

Response 10.1

Reference to the Muir Woods area has been through the term “north of the 990”. The “north of the 990” references will be updated to include reference to the term Muir Woods.

Comment 10.2: A commenter stated that the DEIS should make a serious effort to inventory the wildlife activity that occurs in the “vacant” lands north and east of the University of Buffalo campus, and take steps to avoid disrupting that area.

Response 10.2

Wildlife species identified and anticipated to be found along the corridor have been documented in Chapter 10 of the DEIS, Section 10.3.2. The Proposed Action will generally be within the existing right-of-way south of the I-990 (which will reduce disturbance). The area north of the I-990 will be disturbed by an independent project (Muir Woods development) which plans to create a housing development. The Metro Rail extension north of the I-990 would take place within the footprint of the Muir Woods development.

Comment 10.3: A commenter stated concern for the Proposed Action's impact to natural resources, particularly in the Audubon area.

Response 10.3

It is not anticipated that the Proposed Action would have a significant impact on wildlife such as deer since this project would generally take place within the current roadway right-of-way (ROW). The current ROW is already disturbed by existing Audubon traffic. With respect to the proposed work north of I-990, this area will be disturbed by an independent project which plans to create a housing development.

CHAPTER 11: WATER RESOURCES

Comment 11.1: Commenters expressed concern for the Proposed Action's impact on drainage, particularly along Niagara Falls Boulevard and Maple Road.

Response 11.1

As described in Chapter 11, Water Resources, the Proposed Action will require a State Pollutant Discharge Elimination System (SPDES) stormwater permit. This permit will require restrictions on the quality and quantity of stormwater produced by this project (or capacity taken away). Through this permit, this project will be required to build stormwater facilities to handle stormwater at predevelopment or better rates. Flooding concerns related to the Proposed Action along Niagara Falls Boulevard, Maple Road, and throughout the corridor, will need to be addressed during final design for the project.

Comment 11.2: A commenter questioned the Ellicott Creek "swimming" reference in Chapter 11, Water Resources.

Response 11.2

The intent of the reference to "swimming" in Section 11.3.2 is not a recommendation that people swim in Ellicott Creek. Ellicott Creek is a Class B stream and NYSDEC indicates that Class B waters should meet water quality standards sufficient for human contact.

Comment 11.3: A commenter stated that the removal of forest and future development in the area north of I-990 requires planning for additional water management that should be mentioned in the DEIS and not left to future developers.

Response 11.3

Through the state and federal permitting processes, the development north of I-990 is required to comply with NYSDEC and U.S. Army Corps of Engineers requirements related to wetlands and stormwater. These permitting processes are in place to require that the developer design for appropriate water management.

Development is occurring in the area north of the I-990 regardless of the Proposed Action; however, the presence of a Metro Rail station, park & ride facility, and

storage/light maintenance facility in this area will increase accessibility to these developments and may affect the design of current and future developments.

Any facilities constructed by the Proposed Action will require appropriate permitting and associated water management measures.

Comment 11.4: A commenter expressed concern for the existing drainage issues in the neighborhood near the Niagara Escarpment and that the DEIS should examine the hydrology in greater detail, especially for the proposed tunneling segment, to avoid exacerbating the existing drainage problems.

Response 11.4

As described in Chapter 11, Water Resources, flooding is known to be of concern in the Niagara Escarpment area. Flooding concerns related to the Proposed Action corridor will be assessed during final design for potential implementation of mitigation measures.

CHAPTER 12: GEOLOGY, SOILS, AND FARMLANDS

Comment 12.1: Commenters stated concern for the clay soils within the study area and the Proposed Action should be engineered to work safely on clay soils and not create further foundation issues.

Response 12.1

The Proposed Action's impact on vibration related issues was studied according to the general assessment procedures outlined in the Federal Transit Administration's Transit Noise and Vibration Impact Assessment (FTA Report No. 0123, September 2018). Following the FTA guidance, the vibration analysis assumes the most conservative propagation of vibration from source to receptor and assumes no reduction for vibration propagation based on soil type.

Soil types and their limitations for construction would be evaluated in detail during later preliminary and final design of the Proposed Action. Detailed geotechnical investigations would be conducted to assess soil characteristics along the Proposed Action alignment, so that construction techniques and environmental safeguards can be developed to address any limitations. Soil stabilization techniques would be used in work areas, both during and after construction, to prevent potential sedimentation of nearby waterways and to minimize other potential soil disturbance effects.

CHAPTER 13: TRANSPORTATION

Traffic

Comment 13.1 Commenters were concerned about the impact of the project (particularly the reduced number of lanes and elimination of left turns) on local traffic. Specific concerns included at intersections at Brighton Road, Eggert Road, Maple Road and Sweet Home Road and diversions to side streets (particularly Bailey Avenue and Parker Boulevard).

Response 13.1

While the Proposed Action would not cause a substantial reduction in area-wide roadway congestion, it would provide improved transit travel times and provide a new travel choice in this congested corridor. The Proposed Action would provide improved travel times for transit riders because its use of dedicated lanes would allow it to avoid back-ups and delays at many of the congested intersections in the corridor.

Roadway and intersection improvements will be made throughout the corridor as part of the Proposed Action (see Chapter 13 of the DEIS) which would result in local improvement in congestion and levels-of-service. These include re-aligning intersections, and additional or longer turn lanes. The roadway changes would result in localized improvements to vehicular traffic operations. Additional roadway and intersection improvements may be required per federal agency review during the NEPA process.

Where changes in traffic patterns are planned, the Proposed Action is expected to divert some traffic from existing roads onto adjacent streets. The following locations identify streets where some traffic could divert from and to, as a result of changes made to traffic patterns due to the Proposed Action.

- Niagara Falls Boulevard (between Eggert Road and Maple Road)
The changes to diversions along this section are expected to be minimal. A median already exists along Niagara Falls Boulevard restricting turning movements to/from residential streets. Diversion occurs under the existing condition with traffic using residential streets to reach Boulevard Mall or other destinations along Niagara Falls Boulevard, and those conditions would likely continue. The elimination of a travel lane is not expected to have an impact on traffic flow, as two lanes in each direction would be maintained and additional left turn capacity would be provided under the Proposed Action.
- Maple Road (between Niagara Falls Boulevard and Sweet Home Road)
The changes to diversions along this section are expected to be minimal as there are not many alternatives to Maple Road. Diverting traffic would likely continue to use Alberta Drive, Meyer Road, and Bowmart Parkway, which are equipped to handle traffic. With a signalized intersection at Hillcrest Drive, traffic diversion would likely continue to use Hillcrest Drive and Emerson Drive to divert from the intersection of Maple Road and Sweet Home Road.

Moving the Metro Rail underground at the intersection and providing level-of-service improvements as part of the Proposed Action are being done to reduce delay at that intersection and reduce the potential for traffic diversion.

- Sweet Home Road (between Maple Road and Rensch Road)
The changes to diversions along this section are expected to be minimal as there are not many alternatives to Sweet Home Road and traffic impacts are expected to be minimal. Traffic destined for the University at Buffalo North Campus may divert to using the Flint Road entrance off Maple Road, but those roadways are equipped to handle the traffic load.
- John James Audubon Parkway (between Lee Road and I-990)
There are very few alternatives to John James Audubon Parkway for traffic to divert. With levels-of-service along the roadway expected to continue to be good and major access point maintained, traffic diversion is not expected to be impacted.

The consideration of potential diversions will be further considered during preliminary and final design.

Comment 13.2 Commenters were concerned about backed up traffic from stopped delivery vehicles or garbage trucks when Niagara Falls Boulevard is reduced to one lane in each direction. Others concerned about backing out of driveways onto Niagara Falls Boulevard.

Response 13.2

The conceptual design of the Proposed Action includes the addition of a shoulder on Niagara Falls Boulevard to provide access for maintenance vehicles, emergency vehicles, and delivery trucks. This shoulder would accommodate space for backing out of driveways.

Comment 13.3 Commenter suggested that traffic diversions to other streets could be limited through changes in the traffic pattern or traffic calming devices.

Response 13.3

Comment noted. The suggestions noted in the comment will be considered during the NEPA environmental review and preliminary/final design.

Comment 13.4 Commenters stated that the DEIS assumptions for future traffic should include the Amherst Opportunity Zone, a rezoning that will increase density.

Response 13.4

The traffic modeling will be updated during the NEPA environmental process with opportunities for review by Greater Buffalo-Niagara Regional Transportation Council and the Town of Amherst.

In addition, as stated in the January 2020 Findings Statement for the Amherst Boulevard Central District, the mitigation strategies should be reevaluated if/when the future light-rail transit expansion is implemented by Niagara Frontier

Transportation Authority and may require the preparation of a Supplemental Generic Environmental Impact Statement. NFTA will continue to coordinate with the Town of Amherst on mitigation measures to reduce adverse traffic impacts.

Transit

Comment 13-5: A commenter noted dissatisfaction with NFTA's existing service.

Response 13.5

The Surface Transportation Business Unit is responsible for all ground-based transportation services operated and provided by NFTA. The mission of the Surface Transportation Business Unit is to enhance the quality of life of residents and visitors by providing the highest level of safe, clean, affordable, responsive and reliable public transportation through a coordinated and convenient bus and rail system. Dissatisfied riders can send an email with questions, comments, compliments, or concerns to: info@nfta.com. The email will be directed to the appropriate department within the NFTA.

Comment 13.6 A commenter was concerned about how existing bus routes would be changed following implementation of the project.

Response 13.6

Three of the eight regular Metro Bus routes that intersect the study area would be modified due to the Proposed Action. Those routes and their planned changes are as follows:

- Metro Bus Route 34-Niagara Falls Boulevard would provide service to the Niagara Falls and East Robinson Road area with potential to expand coverage north of the current service area.
- Metro Bus Route 35-Sheridan would continue to provide east-west service between the Blackrock Riverside Transit Hub and Niagara Falls Boulevard along Sheridan Drive. The modified service would continue east-west service along Sheridan Drive to provide access to East Amherst. The route would no longer serve UB North Campus.
- Metro Bus Route 49-Millard Suburban would provide east-west service between the Boulevard Mall on Niagara Falls Boulevard in Amherst to East Amherst. The route would also continue to provide a connection to the Millard Fillmore Hospital along Maple Road in Amherst.

Comment 13.7 A commenter suggested a connection between Metro Rail and the 44 Lockport bus on the Flint Loop to provide accessibility for those in Amherst and Lockport.

Response 13.7

The Proposed Action would provide a connection to the 44 Lockport bus.

Parking

Comment 13.8: Commenters questioned the demand for park and ride facilities considering existing parking facilities.

Response 13.8

The demand for the park-and-ride facilities was identified through the travel demand forecasting conducted using FTA's STOPS model. The STOPS model is established in the transportation planning industry and reviewed and approved by FTA. Based on the project forecasts of potential markets that would be served by the Proposed Action, the Proposed Action would attract 800 to 900 corridor park-and-ride trips and 300 to 400 out-of-corridor park-and-ride trips. Of these, 430 to 470 cars would park at the proposed Boulevard Mall park-and-ride facility (860 to 940 trips) and about 90 cars would park at the proposed I-990 park-and-ride facility (180 trips). Additional traffic forecasting will be conducted for the future NEPA/SEQR environmental document, with FTA as a lead agency.

Comment 13.9: Commenter suggested that electric vehicle charging infrastructure should be included in the park and ride and station locations.

Response 13.9

This design feature will be taken into consideration, but will not be addressed in the environmental review process.

Bicycle and Pedestrian

Comment 13.10 A commenter expressed appreciation that the project includes bicycle accommodations such as bike racks at the stations and a bike lane at Niagara Falls Boulevard.

Response 13.10

Comment noted.

Comment 13.11 Two commenters noted that a connection to the Peanut Line "rails to trails" bicycle path will provide an additional benefit of the project.

Response 13.11

This connection to the bicycle network and added benefit will be noted.

Comment 13.12 Commenters requested that a paved and protected pedestrian/bicycle path be included in the project to improve safety and support first/last mile connections.

Response 13.12

There is not sufficient space on Niagara Falls Boulevard, Maple Road, and Sweet Home Road to build a curb or bollards that separate the bike lanes and vehicular travel lanes without resulting in additional property acquisitions. However, with

the Proposed Action, existing pedestrian and bicycle facilities would be enhanced. The Proposed Action proposes multi-use paths, bicycle lanes, and median refuge areas for pedestrians. On-street bike lanes would be provided along the Proposed Action alignment, adding bike lanes to Niagara Falls Boulevard and Maple Road. The Proposed Action would provide continuous sidewalks along both sides of the alignment, filling in gaps where currently there are not consistent sidewalks or they are in poor condition. A new multi-use bike and pedestrian trail along Audubon Parkway would be constructed with the Proposed Action. These connections would improve bicycle and pedestrian access to the proposed stations and promote connectivity between stations. Multi-use paths for pedestrian and wheelchair accessibility would be constructed leading up to all station areas. In addition, intersections along the corridor would be upgraded with American with Disabilities Act-compliant ramps, and push buttons would be added to the cross walks, thus facilitating the walkability within the study area.

Comment 13.13 Commenters were concerned about the impact of widening the roads would have on pedestrian and bicyclist safety, especially at the intersections.

Response 13.13

The Proposed Action is being designed to be a safe and efficient system. Pedestrian and bicycle enhancements are also included throughout the corridor, and pedestrian crossings will be well marked and delineated. New trail and sidewalk connections are included, as well as bicycle lanes along certain roadways. In addition, speeds will be limited in areas of high pedestrian activity such as major intersections.

Safety and Security

Comment 13.14: Commenters expressed concern about crime activity at the Metro Rail stations and how stations would be monitored.

Response 13.14

The Proposed Action is being designed to be a safe and efficient system. The NFTA will design the station platforms using design principles to increase visibility and surveillance opportunities. Station access will be well marked, safe, and convenient, and stations will be monitored by closed circuit television. Stations located in areas of high visibility and activity also deter crime.

Comment 13.15: A commenter expressed concern that the Proposed Action will lead to an increase in pedestrian injury along the corridor.

Response 13.15

The Proposed Action is being designed to be a safe and efficient system. Pedestrian and bicycle enhancements are also included throughout the corridor, and pedestrian crossings will be well marked and delineated. New trail and sidewalk connections are included, as well as bicycle lanes along certain roadways. In

addition, speeds will be limited in areas of high pedestrian activity such as on the UB North Campus.

Comment 13.16: A commenter questioned whether the removal of the bell at Partridge Run meets the American Accessibility Act (ADA).

Response 13.16

To reduce noise in the residential areas along the Proposed Action alignment north of the proposed Ellicott Station, speed would be limited to 28mph, and warning bells would not be used at at-grade crossings. Gates and flashing warning signals would be located at at-grade crossing, along with detectable warnings, to improve the safety of the crossing per federal regulations and American with Disabilities Act guidelines.

Accessibility

Comment 13.17: Commented stated support for the Proposed Action provided that it provides improved accessibility.

Response 13.17

The Proposed Action would provide a new, more reliable transit choice with improved transit travel times and access to other existing transit services and Metro Rail across the corridor. It would also connect communities and provide access to housing and employment throughout the corridor and beyond.

Comment 13.18 Commenter stated that the project would limit access to Audubon Parkway.

Response 13.18

The Proposed Action would convert Audubon Parkway from a 4-lane divided facility to a two-lane facility utilizing the existing 2-lane southbound facility. The Metro Rail would operate on the 2-lane northbound travel lanes from Lee Road to I-990. At grade crossings would be provided at Frontier Road, North Forest Road, Sylvan Parkway, Gordon R Yaeger Drive, and Partridge Run to provide access to Audubon Parkway.

Ridership

Comment 13.19 Commenters stated that the ridership estimates are flawed and usage is being overestimated.

Response 13.19

The methodologies for travel demand analysis are summarized in Chapter 13 of the DEIS and described in detail in the Appendix G, "Travel Demand Forecasting". The ridership on a given transit service is a function of many factors: the overall travel market is a function of the residential population, the employment, the regional and corridor travel patterns, and the type and location of commercial, retail,

institutional and recreational destinations—among other factors. The usage of the specific service is influenced by the attractiveness and quality of the service relative to other travel options (autos and other transit services), including the travel time, number of transfers, fares, convenience of access (how much time does it take to access stations and get to the destination), and other attributes of perceived benefits and costs.

The methodologies for travel demand analysis are established in the transportation planning industry and are reviewed and approved by FTA. Additional traffic forecasting will be conducted for the future NEPA/SEQR environmental document, with FTA as a lead agency.

Travel Time

Comment 13.20: Commenters asked about the total travel time using the proposed Metro Rail (Amherst to Buffalo) and questioned if it would be faster than taking the bus.

Response 13.20

The estimated travel time from the proposed I-990 Station to University Station would 21 minutes. The existing Metro Rail travel time from University Station to the Erie Canal station is 21 minutes, for a total of 44 minutes. This same trip taken by existing transit services (Metro Bus and Metro Rail) would be one hour and 19 minutes and would require a transfer.

Comment 13.21: Commenter noted that the existing UB Stampede bus headway goals are unrealistic. This should be noted in the DEIS discussion of transportation issues.

Response 13.21

Commented noted and will be incorporated into the future NEPA/SEQR environmental document.

CHAPTER 14: NOISE

Comment 14.1: Commenters stated that the Proposed Action will be quieter.

Response 14.1

Comment noted.

Comment 14.2: Comments stated concern for noise-related impacts to properties along Niagara Falls Boulevard.

Response 14.2

Following the FTA guidance manual, the day-night average sound level, is the noise metric used for residential receptors. This metric encompasses the hourly average noise levels and increases nighttime noise levels to account for the sensitivity of people sleeping. Noise levels are not additive in an arithmetic

manner. At residences along Niagara Falls Boulevard, represented by receptors 3a and 3f, the existing measured noise level is 70 dBA. The Proposed Action noise exposures (i.e., the noise generated by the project) would be between 65-66 dBA at these receptors. When added logarithmically, the total noise level would be 71 dBA, representing an imperceptible increase in noise levels. While project-generated noise may be readily noticeable at times, including during train passbys, the day-night average sound level accounts for fluctuations in noise over a 24-hour period.

As part of the future NEPA/SEQR environmental review, additional noise monitoring is proposed at the corner of Niagara Falls Boulevard and Kenilworth Avenue to represent existing noise levels at the residences and other receptors along Niagara Falls Boulevard that may experience noise as a result of the tunnel portal exit/entrance warning horns, rail activity along Niagara Falls Boulevard, and/or during construction of the proposed tunnel on Niagara Falls Boulevard south of Kenilworth Avenue. Future noise levels at this location will be presented in the NEPA environmental document.

Comment 14.3: Commenters questioned the noise analysis, particularly why there is only a one decibel increase from 70 to 71 on Niagara Falls Boulevard.

Response 14.3

Following the FTA guidance manual, the day-night average sound level, abbreviate Ldn, is the noise metric used for residential receptors. This metric encompasses the hourly average noise levels and increases nighttime noise levels to account for the sensitivity of people sleeping. Noise levels are not additive in an arithmetic manner.

At residences along Niagara Falls Blvd near the Proposed Action portal, represented by receptor 3f, the existing measured noise level is 70 dBA (Ldn). The signaling devices utilized by trains at the tunnel portal would be brief in duration and limited to a maximum noise level of 83 dBA at 50 feet (Lmax). To calculate the day-night average sound level at each receptor, this maximum signal noise level is then adjusted to account for the duration in each hour that the signal would be utilized and a penalty of 10 dBA added to horns that occur during nighttime hours. At receptor 3f, the Proposed Action Noise Exposure (i.e., the day-night average noise generated by the project) which includes the noise from the signaling devices, would be 65 dBA (Ldn). The difference between the 83 dBA instantaneous maximum level and 65 dBA day-night level accounts for the difference between the peak level during a signal sounding and the weighted 24-hour energy average of all signals during a day. When added logarithmically, the Total Noise Level at the receptor would be 71 dBA (Ldn), representing an imperceptible to barely perceptible increase in noise levels. While project-generated noise may be readily noticeable at times, including during train passbys, the day-night average noise metric accounts for fluctuations in noise level throughout the day.

Noise mitigation measures included as part of the Proposed Action are discussed in Chapter 14, Noise of the DEIS. These include implementation of rail skirts on the full fleet of rail vehicles that shield the vehicle wheels on the rails from adjacent

receptors and signaling devices limited to 83 dBA at 50 feet. At residential receptors along Niagara Falls Boulevard, the Proposed Action would not result in any adverse noise impacts and would not require additional noise mitigation measures.

Comment 14.4: Commenter stated concern for noise-related impacts to residential properties along Homecrest Drive.

Response 14.4

The noise analysis presented in Chapter 14 of the DEIS follows the FTA assessment methodology, accounting for daytime and nighttime noise levels at residences and including noise mitigation measures to reduce noise levels, such as implementation of rail skirts on the full fleet of rail vehicles that shield the vehicle wheels on the rails from adjacent receptors and signaling devices limited to 83 dBA at 50 feet. At residential receptors on Homecrest Drive, represented by Receptors 6e and 6j, existing noise levels are 60 dBA and the Proposed Action Total Noise Level would be 61 dBA. The resulting incremental change in noise levels would be imperceptible. While noise from the Proposed Action may be readily noticeable at times, including during train passbys, noise resulting from operation of the Proposed Action would not rise to the level of an adverse impact at these receptors.

Comment 14.5: Commenters stated that the Proposed Action will result in noise pollution in the Audubon area and will be a hardship to residents.

Response 14.5

The noise analysis presented in Chapter 14 of the DEIS follows the FTA assessment methodology, accounting for daytime and nighttime noise levels at residences and including noise mitigation measures, included as design changes, to reduce noise levels, such as rail skirts on the full fleet of rail vehicles that shield the vehicle wheels on the rails from adjacent receptors and reduction of speed and elimination of warning bells north of the proposed Ellicott Station. There is the potential for adverse noise impacts at residences within 172 feet of the proposed track along John James Audubon Parkway between Dodge Road and the Amherst Police station, represented by Receptor 13a. The resulting incremental noise level increases due to the Proposed Action of up to 6 dBA would be considered a readily noticeable change. Project-generated noise at these residences may be readily noticeable at times, including during train passbys, and the day-night average noise level accounts for these fluctuations in noise level over a 24-hour period. The maximum predicted Proposed Action Total Noise Levels at these residences, while they do constitute an adverse impact, are calculated to be 58 dBA, which would be lower than the existing noise levels at other residential receptors analyzed. At residences located more than 172 feet from the proposed track along John James Audubon Parkway between Dodge Road and the Amherst Police station, noise from the Proposed Action would be lower and while trains may be audible, the total noise level would not constitute an adverse noise impact.

Comment 14.6: Commenter expressed concern that the noise impacts identified in the DEIS are based on new track conditions and new Metro Rail vehicles and will not be reasonable over any length of time. As such, noise impacts in the Audubon area will be more severe and extend beyond the impact area defined in the DEIS.

Response 14.6

The noise analysis presented in Chapter 14 of the DEIS follows the FTA guidance manual. The day-night average sound level is the noise metric used as the criteria for determining moderate or severe impacts at residential receptors. This metric encompasses the hourly average noise levels, accounts for fluctuations in noise over a 24-hour period, and increases nighttime noise levels to account for the sensitivity of people sleeping. The noise analysis includes noise mitigation measures to reduce noise levels, such as rail skirts on the full fleet of rail vehicles that shield the vehicle wheels on the rails from adjacent receptors and reduction of speed and elimination of warning bells north of the proposed Ellicott Station. The Proposed Action would include a program of preventive maintenance, including rail grinding, rail head grinding, and wheel truing on the rail vehicles and tracks (see Chapter 15, Vibration of the DEIS). Specifically, preventive maintenance would keep both the vehicle wheels and the tracks at "like new" conditions. Following the FTA guidance manual, this maintenance program is not included as a noise mitigation measure.

Comment 14.7: Commenters asked about noise mitigation in the Audubon area, including what measures are being proposed and what measures were considered (e.g., sound barrier, vegetation).

Response 14.7

The noise analysis presented in Chapter 14, Noise of the DEIS follow the FTA assessment methodology. Noise mitigation measures include implementation of rail skirts on the full fleet of rail vehicles that shield the vehicle wheels on the rails from adjacent receptors, signaling devices limited to 83 dBA at 50 feet, and reduction of speed which allows for the elimination of warning bells north of the proposed Ellicott Station. The train signaling device maximum noise level was established for the purpose of reducing noise to the extent possible while still providing the necessary audibility at a distance from the rail vehicle for safety purposes. Variable-volume warning signals based on ambient level at the location of the rail vehicle would not ensure acceptable/audible level for a safety warning at locations further from the rail vehicle.

There is the potential for adverse noise impacts at residences within 172 feet of the proposed track and vibration impacts due to human perceptibility of vibration within 160 feet of the at-grade track along John James Audubon Parkway. The resulting incremental noise level increases due to the Proposed Action of up to 6 dBA would be considered a readily noticeable change. The maximum predicted Proposed Action Total Noise Levels at these residences as identified in Table 14-7, while they do constitute an adverse impact, are calculated to be 58 dBA, which

would be lower than the existing noise levels at other residential receptors analyzed.

Additional mitigation options including wayside noise barriers, removal of at-grade crossings, and an alternate track alignment utilizing the southbound lanes of the John James Audubon Parkway were considered and were found to either not be feasible or not provide additional benefit. Vegetation planted as part of the Proposed Action is not provided for the purposes of noise mitigation and has not been credited with any reduction in the project noise exposure levels.

Comment 14.8: Commenter questioned the safety sounds proposed for the Metro Rail Expansion, stating that safety noise does not have to be any louder than necessary.

Response 14.8

Noise mitigation measures included as part of the Proposed Action are discussed in Chapter 14, Noise of the DEIS. These include implementation of rail skirts on the full fleet of rail vehicles that shield the vehicle wheels on the rails from adjacent receptors, signaling devices limited to 83 dBA at 50 feet, and reduction of speed which allows for the elimination of warning bells north of the proposed Ellicott Station. The train signaling device maximum noise level was established for the purpose of reducing noise to the extent possible while still providing the necessary audibility at a distance from the rail vehicle for safety purposes. Variable-volume warning signals based on ambient level at the location of the rail vehicle would not ensure acceptable/audible level for a safety warning at locations further from the rail vehicle.

Comment 14.9: Commenter stated that the turns coming out of University Station and from Kenmore to Niagara Falls Boulevard could result in wheel squeal sounds that will reverberate into the residential neighborhoods.

Response 14.9

Wheel squeal is a function of the design speed versus the radius of the curve as well as the amount of superelevation (where one rail on the track is higher than the other to create a banked effect and help smooth the effects of the curve). The turn from Kenmore Avenue to Niagara Falls Boulevard is completely underground with no line of sight to any receptors. In addition, the design speed is only 15 mph at this location and adequate superelevation will be incorporated during preliminary and final design.

For locations along the Proposed Action alignment where the tracks are at-grade, rail skirts utilized on the full fleet of rail vehicles as part of the noise mitigation measures will help to reduce noise from the wheel squeal by shielding the vehicle wheels on the rails from adjacent receptors. In addition, for locations where the Metro Rail would be operating in mixed traffic, there is not an opportunity for superelevation because it would affect the vehicles crossing the intersection. For any locations, where the Metro Rail tracks would interface with the road while still on the curves (i.e. at Putnam Way and JJ Audubon Pkwy), superelevation will be incorporated during preliminary and final design to mitigate any wheel squeal.

CHAPTER 15: VIBRATION

Comment 15.1 Commenters expressed concern that the Proposed Action will have negative vibration effects to residential homes along Niagara Falls Boulevard.

Response 15.1

The vibration analysis presented in Chapter 15 of the DEIS follows the FTA general assessment methodology for vibration and includes mitigation measures (resiliently supported rail ties and fasteners, and vehicle/track maintenance). Residences within 140 feet of the underground track and 165 feet of the at-grade track along Niagara Falls Boulevard, represented by Receptors 5 and 6, have the potential to experience vibration impacts related to human perceptibility of vibration. However, as summarized in Table 15-9, the Proposed Action generated vibration levels would be below the 90 VdB threshold specified by FTA's guidance for damage to even the most fragile structures. The vibration analysis follows the FTA general assessment methodology and accounts for wood framed buildings at residences along Niagara Falls Boulevard.

Similarly, the construction vibration analysis presented in Chapter 15 of the DEIS follows the FTA guidance manual methodology and identifies the construction equipment capable of producing the maximum vibration for each construction work area. As summarized in Section 15.4.2.1, vibration from construction of surface trackwork for the Proposed Action is anticipated to exceed the thresholds for human perceptibility and annoyance at residences within 63 feet of the track, but would not occur at a level which would result in damage to any buildings.

Comment 15.2 Commenters expressed concern that the Proposed Action will have negative vibration effects to residential homes near John James Audubon Parkway.

Response 15.2

The vibration analysis presented in Chapter 15 of the DEIS follows the FTA general assessment methodology for vibration and includes mitigation measures (resiliently supported rail ties and fasteners, and vehicle/track maintenance). Following the FTA guidance, the vibration analysis assumes the most conservative propagation of vibration from source to receptor and assumes no reduction for vibration propagation based on soil type. Residences within 160 feet of the at-grade track along John James Audubon Parkway between Dodge Road and the Amherst Police station, represented by Receptor 23, have the potential to experience vibration impacts related to human perceptibility of vibration. However, as summarized in Table 15-9, the Proposed Action generated vibration levels at all receptors would be below the 90 VdB threshold specified by FTA's guidance for damage to even the most fragile structures. Along John James Audubon Parkway between Dodge Road and the Amherst Police station underground utilities or pipes located more than 10 feet from the Proposed Action alignment would experience vibration levels from rail activity less than 90 VdB and therefore less than the threshold for potential damage caused by vibration.

Similarly, the construction vibration analysis presented in Chapter 15 of the DEIS follows the FTA guidance manual methodology and identifies the construction equipment capable of producing the maximum vibration for each construction work area. As summarized in Section 15.4.2.1, vibration from construction of surface trackwork for the Proposed Action is anticipated to exceed the thresholds for human perceptibility and annoyance at residences within 63 feet of the track, but would not occur at a level which would result in damage to any buildings.

Comment 15.3: Commenter stated that the vibration impacts to residential neighborhoods due to operations can be mitigated by using the southbound lane of John James Audubon Parkway for light rail rather than the northbound lane.

Response 15.3

Evaluation of the Proposed Action alignment considered placing the tracks along the southbound lanes of John James Audubon Parkway and shifting the northbound and southbound traffic lanes to the current northbound lanes. Due to the requirement of two additional at-grade crossings of John James Audubon Parkway (just after the proposed Ellicott Station and just south of the Dodge Road intersection) and the requirement of pedestrians and Metro Rail riders crossings the two travel lanes of John James Audubon Parkway to access the proposed Audubon Station, this option would not be feasible or provide additional benefit.

Comment 15.4: Commenter expressed concern for the vibration impacts associated with construction of the Proposed Action, near the University at Buffalo South Campus.

Response 15.4

The construction vibration analysis follows the FTA guidance manual and is detailed in Chapter 15 of the DEIS. For areas that involve underground tunneling, including near the University at Buffalo South Campus, blasting would be utilized, as discussed in Section 15.4.2.2. All blasting would occur underground and the blasting program would be carefully monitored and designed to minimize impacts. As discussed in Chapter 15 of the DEIS, vibration monitoring would be required for any blasting activities that could result in vibration that would exceed the construction vibration damage criteria at an existing structure. As such, tunnel blasting would not result in an adverse vibration impact at any receptor.

Comment 15.5: Commenter expressed concern that their property on Homecrest Drive will be impacted by construction-related vibration.

Response 15.5

The construction vibration analysis presented in Chapter 15 follows the FTA guidance manual methodology and identifies the construction equipment capable of producing the maximum vibration for each construction work area. As summarized in Section 15.4.2.1, vibration from construction of surface trackwork and cut and cover trackwork for the Proposed Action is anticipated to exceed the thresholds for

human perceptibility and annoyance at residences within 63 feet of the track, but would not occur at a level which would result in damage to any buildings.

CHAPTER 16: AIR QUALITY

Comment 16.1: Commenters stated that the Proposed Action will improve air quality by removing cars from the road and that the DEIS should include an estimate of induced demand and emphasize the reduction in greenhouse gases.

Response 16.1

Air quality analyses for the Proposed Action were performed following U.S. Environmental Protection Agency (EPA) guidance. Embodied emission calculations for raw materials, including the extraction, manufacturing, and transport of project-related products are not required by the EPA. Therefore, project-level studies do not include the production of electricity or fuel in the analysis.

Depending on the future energy market and regulations on power plant emissions, the electricity generated to power the Proposed Action could be produced by a variety of methods, some of which produce fewer emissions over the current energy mix. Also, implementation of advanced emission reduction technologies at power plants would decrease air pollutant emissions of particulate matter, sulfur dioxide, nitrogen oxides, and mercury.

At the project level, the Proposed Action is projected to reduce automobile vehicle-miles by 15,595 daily in 2040, which would contribute to the improvement of the region's air quality. Although the Proposed Action is not expected to dramatically alter the existing energy conditions within the corridor, it would offer a more efficient transit alternative to energy consumptive petroleum powered transportation.

CHAPTER 17: ENERGY

Comment 17.1: Commenter stated that the DEIS should note that transportation constitutes 40% of greenhouse gas pollution in Erie County.

Response 17.1

Chapter 17 of the DEIS summarizes United States and New York State energy use. Greenhouse gas emissions data are available for Erie County. County-level energy consumption data are not available.

CHAPTER 18: HAZARDOUS AND CONTAMINATED MATERIALS

No public comments were submitted for this chapter.

CHAPTER 19: CONSTRUCTION EFFECTS

Comment 19.1: Commenter asked for the estimated construction duration and how NFTA will ensure that construction will be completed on time.

Response 19.1

As described in Chapter 19, Construction Effects, the Metro Rail Expansion would involve a multi-year construction phase, which would be developed following completion of the environmental process and engineering phase. Before revenue service could begin, the following major steps would occur: preliminary and final design, preconstruction activities, construction, and testing.

In the next phase, the NFTA will develop a Contracting Plan that will establish the number of construction and procurement contracts and their interfaces. At that time a project construction schedule can be developed defining not only the overall construction duration; but also the duration in each segment or neighborhood. As contracts are awarded, the NFTA will require each contractor to prepare and maintain a detailed construction schedule based on their bid submittal.

During construction, the NFTA will proactively review, analyze and monitor the contractor's schedule including any changes as construction progresses. This will allow the NFTA to identify and mitigate potential issues before they negatively impact the overall project completion.

Comment 19.2 Commenters stated that the Environmental Impact Statement should emphasize that the construction effects are temporary and short-term in duration, but the benefits would be long-term and exceed the traffic, noise, and air quality effects.

Response 19.2

Future environmental documentation will emphasize that the construction effects are temporary and short-term in duration, but the benefits would be long term.

Comment 19.3 Commenters stated that the temporary construction effects related to traffic and noise would have a negative impact on the community.

Response 19.3

A coordinated plan for work zone traffic control (WZTC) will be developed during final design of the Proposed Action to allow for the safe and efficient flow of traffic along the project corridor. It is anticipated that staged construction methods will be utilized. The intent of staged WZTC is to maintain existing traffic flows during peak periods and minimize traffic effects throughout the corridor. The staged construction methods to be used will be determined during the final design and construction phases of the Proposed Action.

Nuisance effects, such as noise, vibration, and dust, will occur temporarily in construction areas and those areas adjacent to the construction activities. Typical measures in construction contracts to minimize such nuisances during construction will be implemented. These may include the following:

- Providing proactive and corrective measures for dust suppression through the application of water
- Cleaning construction truck tires before leaving the construction site
- Limiting idle time for diesel-powered equipment
- Using maintained equipment with effective mufflers
- Employing sufficient detours to reduce vehicular idling
- Performing pest control work prior to earth work activities

Through the implementation of mitigation measures, the temporary effects to the community during construction are not anticipated to be adverse.

Comment 19.4 Commenter expressed concern about how digging a tunnel could result in flooding from disruption of land.

Response 19.4

The tunnels will be designed and constructed to be watertight, so the project will have no effect on flooding. However, since portions of the tunnels will be constructed below the water table, some ground water will be captured and discharged with any stormwater captured in the construction areas. The Proposed Action will require a State Pollutant Discharge Elimination System (SPDES) stormwater permit. This permit will require restrictions on the quality and quantity of stormwater produced by this project (or capacity taken away). Through this permit, this project will be required to build stormwater facilities to handle stormwater at predevelopment or better rates. Flooding concerns related to construction of the Proposed Action will be addressed during final design for the project.

Comment 19.5 Commenter expressed concern over the construction effects to the small businesses fronting on Niagara Falls Boulevard which are dependent on direct access by customers who arrive in their vehicles and inquired whether there would be any funding to help them move, if needed.

Response 19.5

As described in Chapter 19, Construction Effects, Construction of the Proposed Action would temporarily affect local businesses, residences, and traffic operations along the entire Proposed Action alignment, including Niagara Falls Boulevard. A Community Relations Program would provide general construction scheduling information, coordination of construction work with adjacent business activities, and assistance with the resolution of issues that could develop between local residents, motorists, the contractor, and the sponsoring agency. The details of the

program would be included in a Construction Education and Outreach Plan, which would be executed before and during construction activities. Niagara Frontier Transportation Authority (NFTA) would implement the plan.

During construction a minimum of one travel lane in each direction will be provided on Niagara Falls Boulevard. Driveway approaches will be stage constructed (one half at a time) where possible and a minimum of one driveway will be maintained for properties with multiple entrances. This will allow for continuous access to adjacent properties.

CHAPTER 20: INDIRECT AND CUMULATIVE IMPACTS

Comment 20.1: A commenter asked for clarification on whether sales tax revenue projections under the Proposed Action were annual and whether they would accrue before or after the start of operations.

Response 20.1

Service on the Metro Rail Expansion is estimated to start in 2030. As described in Chapter 3 of this DEIS, a horizon year of 2040 was used for population, employment and housing projections. The projected \$8.7 million in additional sales tax revenue for the State of New York and \$10.3 million in additional sales tax revenue for Erie County are annual figures, estimated in 2016 based on employment projections. The sales tax revenue projections are based on full buildout of the study area over 20 years. Actual sales revenues would be subject to type, scale, and timing of individual redevelopment projects.

Comment 20.2: A commenter stated that the potential for development is purely speculative and not grounded in factual evidence.

Response 20.2

NFTA conducted a review of the academic literature on the property value impacts around stations associated with proximity to high-quality transit lines, including light-rail transit (LRT). Key findings from the literature review are as follows:

- There is a clear consensus from the literature that properties located near high-quality transit stations experience a property value premium in both fast- and slow-growing regions. Both residential and commercial properties experience a transit value premium.
- The value premium for residential properties near transit stations tends to be between zero and 10 percent, although some studies find the premium to be considerably higher.
- Based on the available research, the extent of the area around transit stations that experience property value premiums may be smaller in slower-growing regions than in faster-growing regions. In faster-growing regions property value premiums are often observed as far as three miles away from stations,

while in slower-growing regions the property value premiums typically extend up to one quarter of a mile from stations.

- Transit appears to have the greatest positive impact on property values when the transit system significantly improves households' access to employment centers and other key destinations. By connecting downtown Buffalo and outlying suburban areas with the University at Buffalo, the Metro Rail line could have a significant impact on property values.
- Other factors that will be important for maximizing the benefits of the transit investment include supportive land use policy and well-designed station area connectivity. The literature suggests that station areas which are zoned for higher intensity uses tend to see higher property value premiums. Similarly, transit stations that have good pedestrian connections in walkable neighborhoods or good vehicular station access in more automotive-oriented neighborhoods are likely to have higher property value premiums.

Comment 20.3: A commenter noted that land speculation along the corridor and increasing property values have the strong potential to displace residents, small businesses and/or the social service providers. Clear strategies are needed to prevent displacement and preserve and increase affordable housing along the Proposed Action corridor.

Response 20.3

The NFTA and Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) have discussed concerns regarding the preservation of affordable and low-income housing with both the towns of Amherst and Tonawanda. Following is a summary of the progress each town has made regarding affordable housing in the Proposed Action study area:

- A number of public assistance programs, including home and business improvement subsidies and public infrastructure funding, are in place in Erie County, through the Amherst-Cheektowaga-Tonawanda HOME Consortium, to address priority needs related to affordable housing, economic revitalization and public services.
- Land use and zoning decisions made by the towns also may affect the stock and affordability of local housing. NFTA and GBNRTC support appropriate development around stations but will continue to work with the towns, stakeholders, and local advocacy groups to identify and suggest policies to address this issue.

Comment 20.4: A commenter noted that Section 20.4.1 should be amended to say that the Proposed Action will significantly reduce traffic demand on the Millersport Highway/Grover Cleveland corridor due to the elimination of the UB Stampede buses and reduction in commuting demand between UB North Campus and South Campus in the Millersport Highway/Grover Cleveland corridor. The Proposed Action will make it possible for the Town of Amherst to implement its proposal to give the Grover Cleveland/Millersport corridor a road diet and a complete street makeover,

including improvements to the New York State Bike Route 517. Air quality and noise improvements are also anticipated for the Millersport Highway corridor.

Response 20.4

Section 20.4.1 has been updated to state that the Proposed Action has the potential to reduce traffic demand on the Millersport Highway/Grover Cleveland corridor due to the elimination of the UB Stampede buses and reduction in commuting demand between UB North Campus and South Campus. The reduction in vehicular traffic would contribute to the improvement of the region's air quality.

CHAPTER 21: COMMITMENT OF RESOURCES

Comment 21.1 A commenter asked for the cost estimate to build the Proposed Action.

Response 21.1

NFTA is preparing a cost estimate for the construction of the Proposed Action. This cost will be reported in future environmental documentation. The cost of the project will be considered in light of its expected benefits, which include serving 30,438 riders daily. It provides a new, more reliable transit choice with improved transit travel times and access to other existing transit services and Metro Rail across the corridor. It will also connect communities and provide access to housing and employment throughout the corridor and beyond. It results in a cost-effective project when evaluating the cost per user benefit.

Comment 21.2 Commenters stated that funding the Proposed Action should not fall on tax payers.

Response 21.2

The anticipated sources of funding for the Proposed Action include the Federal Transit Administration's Capital Investment Grant/New Starts program, as well as state and local funds.

Comment 21.3: Commenters expressed concern that the Proposed Action may not receive federal or state funding, due to the competitiveness of other areas.

Response 21.3

The NFTA believes that the benefits of this long-term transportation investment will justify the cost. Project funding is expected to be a combination of state, local, and federal. While the Proposed Action would compete for funding with projects from all across the country, the Proposed Action is competitive in projected ridership, cost-effectiveness, user benefits, and many other areas as compared to other projects receiving federal funds.

Comment 21.4 A commenter stated that previous light-rail projects have produced typical corruption, price overages on construction, and unsustainable maintenance costs.

Response 21.4

The design of the Proposed Action is the result of the environmental analysis, input from agencies, and the continued involvement of the community. Throughout the development of the Proposed Action, the NFTA made refinements to reduce overall project costs and to maintain a cost-effective project while providing a high-quality system. During final design, NFTA will be cognizant of the issues noted by the commenter and review contract bids and change orders.

Comment 21.5: Commenters stated that the money for the Proposed Action should instead be used to improve the existing NFTA system.

Response 21.5

Transit is a regional asset and many people currently use the existing transit system. NFTA will continue to invest in the current system. The anticipated funding for the Proposed Action includes a mix of federal, state, and local funds. Expanding the Metro Rail system to the towns of Amherst and Tonawanda would make the service more attractive and accessible.

CHAPTER 22: PUBLIC INVOLVEMENT

Comment 22.1: Commenters expressed concerns that the project process has not performed adequate outreach to the community, provided adequate opportunities for public comment and/or adequately included community perspectives in the decision-making process.

Response 22.1

The NFTA has provided meaningful opportunities for public participation and engagement. The public involvement activities and methods for involving the public in the Proposed Action were developed in consideration of the local communities, such as holding meetings within the local communities near public transportation routes and advertising meetings in locations that are frequented by the local communities.

At the onset of the environmental process, NFTA initiated Scoping to provide agencies and the public an opportunity to provide input on the Proposed Action's purpose and need, its objectives, the potential alternatives under consideration, and the environmental analysis methodology. NFTA issued a Draft Scope, followed by a 45-day public comment period. During this period, public outreach activities included a public meeting and a pop-up event in the community.

The NFTA presented the Proposed Action to local community organizations, including the Hartford Estates and North Bailey Home-Owners Associations, the Willowridge Civic Association, Ken-Ton Chamber of Commerce, the Rotary Club of Kenmore and the Audubon Home-Owners Association.

Over twenty public engagement events, including public meetings, pop-ups at events in the area and community organization-hosted meetings have been held in the course of the project. News releases and advertisements for public meetings have been sent to newspapers in Greater Buffalo-Niagara Region and information about the project has been shared via social media and emails to a continuously growing contact list with 800 individual addresses. Written and spoken public comments were collected at meetings, through the project website, and through a questionnaire on Station Design & Connections which garnered 457 responses. Postcards announcing the release of the DEIS were sent to all properties located within the study area – a 1/4-mile from the Proposed Action alignment and 1/2-mile from Proposed Action stations.

Public involvement will continue during preliminary and final design as well as construction of the Proposed Action.

Comment 22.2: Commenters stated that there was not sufficient notice given for the public hearings, and people could not attend the hearing because of the hearing times.

Response 22.2

Advertisements for the public hearings were placed in the Buffalo News, KenTon, and Amherst Bees on the project website and NFTA's social media accounts. Postcards announcing the hearings were sent to all properties located within the study area – a 1/4-mile from the Proposed Action alignment and 1/2-mile from Proposed Action stations, an email was sent to the project's contact list, and a Rider Alert was posted on NFTA vehicles.

Two public hearings were held – one in the evening (5:00 PM) and one during the daytime (1:00 PM) to allow attendees the flexibility. The materials presented during the hearings is also available on the project website. In addition to the public hearings, the NFTA accepted comments on the DEIS through the project website, by email, and by mail. All comments received during the public comment period were given equal consideration. The NFTA established a 60-day comment period for the DEIS, which is greater than the state and federal requirements.

Comment 22.3: Commenters noted confusion or dissatisfaction with the format of the public hearings held on the Draft Environmental Impact Statement and the lack of a Question and Answer (Q&A) session during the hearings.

Response 22.3

Under the New York State Environmental Quality Review Act (SEQR), public agencies have the option of holding one or more public hearings on the DEIS. NFTA elected to hold two public hearings during the public comment period for the DEIS, one during the evening and one during the daytime. The public hearings followed procedural guidelines to ensure that substantive public comments are properly recorded and attributed for inclusion in the FEIS.

Appendix C, Public Outreach and Coordination Report of the DEIS outlines the public engagement activities undertaken for the project, which included

opportunities for questions and answers. Over 20 events, including public meetings, pop-ups at events in the area and community organization-hosted meetings, have been held in the course of the project. Information about the project has been distributed via local media outlets and via social media and emails to a continuously growing contact list with 800 individual addresses. Written and spoken public comments were collected at meetings, on the project website, and through a questionnaire on Station Design & Connections, which garnered 457 responses.

Comment 22.4 A commenter asked where public comments can be found on the project website.

Response 22.4

Comments submitted during the Scoping Period between January 24 and March 10, 2019 are available in the Final Scoping Document in “Document Library” section of the project website. Comments submitted during the Draft Environmental Impact Statement Public Comment Period between January 24 and March 24, 2020 are included in this Response to Comments document and will be available on the project website.

Comment 22.5: Commenters remarked that they were grateful for the opportunity to participate.

Response 22.5

Comment noted. Thank you for participating.

Comment 22.6: Commenters stated concern that surveys were not conducted for the project.

Response 22.6

As described in Appendix C, Public Outreach and Coordination Report of the DEIS, surveys have been used during the environmental review and conceptual design to collect public input. A Station Design & Connections Questionnaire was administered between June 11 and August 30, 2019 (80 days) to collect input on and received 457 responses. The purpose of this survey was to gather public input on elements of the proposed station designs including canopies and shelters, platform configuration, and road separators, as well as potential connections to proposed stations including bike, bikeshare and pedestrian facilities.

A Corridor Employer and Employee Survey was administered between September 16 and November 27, 2019. The survey received 217 responses. The purpose of this survey was to (1) to learn about parking and transportation issues employers and employees currently face that could be mitigated by the addition of light rail to the corridor, (2) to ensure that businesses and their employees in the proposed Metro Rail Expansion corridor, who may disproportionately benefit or be impacted from the addition of light rail to the area, are aware of the project and (3) to gather input on what kinds of environmental impacts employers and employees are concerned about and their preferred methods for mitigating said impacts.

2 Town of Amherst Comments

EXECUTIVE SUMMARY

Comment: Table S-3, Capacity Change for Boulevard Mall should be clarified (not exactly clear): should probably say “southern” entrance not “northern” and instead of saying “through the mall property” maybe say “along the perimeter outskirts of the mall property” or something similar

Response

References to the Boulevard Mall will be clarified as noted in the comment in the future NEPA/SEQR environmental document.

Comment: Pg. S-11, S.4.7 – what about Sunday service?

Response

Metro Rail Sunday service is consistent with Saturday service. This will be noted in the future NEPA/SEQR environmental document.

Comment: Table S-4 Land Use, Zoning and Community Character Add “May force alteration of land use on Niagara Falls Boulevard south of Eggert (residential to commercial)” to Benefits/Adverse Effects

Response

The referenced text will be incorporated into a future environmental document.

Comment: Add something regarding “Audubon area impacts/modified demands” to Benefits/Adverse Effects

Response

A bullet stating that the proposed I-990 station could alter and increase the density of the mixed-used development planned for the Muir Woods site and the park & ride facility would attract I-990 commuters will be added to a future environmental document.

Comment: Socioeconomic Conditions – Add “Help mobility options for lower-income census areas” to Benefits/Adverse Effects; Add “loss of income for businesses during construction” to Measures to Avoid/Minimize/ Mitigate

Response

“Help mobility options for lower-income census areas” to Benefits/Adverse Effects and “loss of income for businesses during construction” will be added to a future environmental document.

Comment: Community Facilities – Inject any population growth or Effect on schools for Benefits/Adverse Effects?

Response

The future NEPA/SEQR environmental document will note the potential for induced demand.

Comment: Environmental Justice – What additional measures would be taken during construction to mitigate – list these?

Response

The future NEPA/SEQR environmental document will list additional measures that would be taken during construction.

Comment: Visual Resources – Add “screening, color, design,” etc. to the Measures to Avoid/Minimize/ Mitigate section

Response

The noted visual mitigation measures will be added to the future NEPA/SEQR environmental document.

Comment: Water Resources – What about wetland mitigation or SWPPPs for Measures to Avoid/Minimize/ Mitigate section?

Response

Wetland impacts will be refined during further design and design refinement to be made to avoid wetland impacts where practicable.

The Proposed Action was reviewed with respect to required stormwater mitigation. A total initial water quality volume (WQv) of 2.78 acre-feet is required for treatment of impacts to all of the drainage basins within the footprint of the Proposed Action. This initial WQv is based on the Proposed Action alignment and typical sections as of April 2020. The initial WQv could be reduced by resurfacing portions of the roadways where applicable (instead of full depth reconstruction) and the implementation of green infrastructure techniques (e.g., impervious removal with soil restoration). The remainder of the WQv will need to be treated with various BMP treatments. The stormwater basins at the Boulevard Mall and at the University at Buffalo North Campus will need to be replaced by treatments

with the capacity to treat the same amount of stormwater they treat today and any increased capacity needed for the initial WQv in those areas.

Comment: Transportation: Traffic Operations – Add something regarding “potential re-routing on local streets when LRT is at grade” to the Measures to Avoid/Minimize/Mitigate section

Response

“Potential re-routing on local streets when LRT is at grade” will be added as a transportation mitigation measure in the future NEPA/SEQR environmental document.

CHAPTER 1: PROJECT DESCRIPTION

Comment: Pg. 1-16, Maple Road paragraph, The first sentence should probably read “...the alignment would run along the eastbound shoulder...”; The last sentence should probably read “...and emerge from a portal on the east side of Sweet Home...”

Response

The suggested edits will be incorporated into the Project Description in the future NEPA/SEQR environmental document.

Comment: Pg. 1-17, Sweet Home Road paragraph – the second sentence should probably read “...would be located on the east side of Sweet Home Road...”

Response

The suggested edits will be incorporated into the Project Description in the future NEPA/SEQR environmental document.

Comment: The Town would like to see a bicycle lane included as part of the proposed street section along John James Audubon Parkway (pg. 1-21)

Response

A new multi-use bike and pedestrian trail along Audubon Parkway would be constructed with the Proposed Action. The noted graphic will be revised to clarify the multi-modal trail.

Comment: Pg. 1-30, Light Maintenance/Storage Facility section – should there be mention of any noise or pollutant increases in the area as a result of this facility?

Response

The noise levels analyzed for the Proposed Action are the sum of the rail noise components (i.e., surface railway, crossing signals, train signals, substations, and light maintenance/storage facility), and the non-rail noise component (which is assumed to be the existing level). The noise exposure is the level of noise that would be produced by operation of the Proposed Action and is compared to the

impact criteria to determine whether the Proposed Action could result in a noise impact. No impact was identified at the receptor near the light maintenance/storage facility, which would be fully enclosed.

CHAPTER 2: LAND USE, ZONING, & COMMUNITY CHARACTER

Comment: There is limited discussion of how the light rail extension would induce growth on less developed lands at the terminus near the I-990. For a variety of reasons the Town is more sparsely developed in its northern portion (lack of sewers, environmental concerns, designated park and agricultural spaces), and the extension/terminus could be growth inducing in this area. The Town, with its new mixed-use zoning, will encourage new development and redevelopment within existing commercial centers, but does not seek to encourage more intensive land uses into areas that are currently less developed. This is important to note within this section.

Response

The suggested text in the comment will be incorporated in the future NEPA/SEQR environmental document.

Comment: Pg. 2-5, second paragraph, there could be mention in this section that a break-in-access at John James Audubon and the I- 990 is being sought by the Town – an application has been submitted.

Response

The future NEPA/SEQR environmental document will mention the potential for a future break-in access at John James Audubon and the I- 990.

Comment: Pg. 2-6, Figure 2-2 – questions about why some of the parcels are labeled vacant when they are not currently? (i.e. triangle of land between Eggert, Sheridan and NF Blvd). Check those shown vacant.

Comment: Pg. 2-8, Figure 2-3 – in general need to check on the land uses as some are mislabeled

Comment: Pg. 2-12, Figure 2-5 – please note that the Town now has new mixed-use districts and is currently in the process of rezoning them. This may need to be revisited in the future.

Response

Comment noted. The existing land use figure are based on 2018 Erie County parcel data, and the zoning map reflects the municipalities zoning code. Any land use or zoning changes will be reflected in the future NEPA/SEQR environmental document.

Comment: Pg. 2-13,
First paragraph – make mention of University Plaza?

First paragraph, last sentence – not all the homes transition to multi-family, actually it's mostly single-family homes
Fourth paragraph, second sentence – the space around Sweet Home Middle is not really greenspace because it is private and owned by the School District

Response

The suggested edits will be incorporated in the future NEPA/SEQR environmental document.

CHAPTER 3: SOCIOECONOMIC CONDITIONS

Comment: There is limited discussion on the future of retail services in the corridor and how current and emerging trends, along with impacts like those we are experiencing during today's pandemic may affect current businesses and employment within the corridor. If retail businesses struggle along the corridor, how might employment be affected, what role might enhanced transit play in redefining land use and employment in the corridor?

Response

The future NEPA/SEQR environmental document will consider the role enhanced transit could play in redefining land use and employment in the Proposed Action corridor. NFTA and Greater Buffalo-Niagara Regional Transportation Council are engaged in a second phase of transit-oriented development planning, as a regional effort. The Phase II study will further develop the recommendations and strategies set forth in the 2018 Comprehensive TOD Plan and set the stage for continued advocacy and implementation of TOD strategies along the Metro Rail corridor.

Comment: Data regarding SUNY is generally absent (similar to the TOD study previously completed). Data presented in Section 6 should be referenced in Section 3 too, as it is a socioeconomic component.

Response

NFTA has data from the State University of New York and will present any available data in the future NEPA/SEQR environmental document. A reference to the environmental justice analysis will be added to the socioeconomic section of the future NEPA/SEQR environmental document.

Comment: Table 3-7- does this data accurately account for the Town of Amherst Boulevard Central District GEIS data? It is referenced in 3.6 Mitigation, but is that enough?

Response

The data presented in Table 3-7 are based on the Greater Buffalo-Niagara Regional Transportation Council travel demand model. Any updates to the model, including the Amherst Boulevard Central District, will be accounted for in the future NEPA/SEQR environmental document.

Comment: The comments around age and educational attainment and the “assumptions” that were being made are a little concerning. From our perspective, our community may not necessarily be comparable to the areas which comprise the American Public Transportation Association.

Response

Additional information about the relationship demographic data and transit propensity as it applies to the Buffalo-Niagara region will be included in the future NEPA/SEQR environmental document.

CHAPTER 4: POTENTIAL PROPERTY ACQUISITIONS AND DISPLACEMENTS

General Comments

Comment: When displacing and moving business, location has the biggest impact on value. Care must be taken to move displaced businesses to similar area regarding traffic counts/demographics etc.

Response

Comment noted.

Comment: The Town’s current Assessed Values (equalized) should provide a good basis on value. Deviations of more than 10% should be considered an issue, unless the value is being driven by lost business (not real property) value that the partial or full acquisition is causing.

Response

Comment noted. Assessed values will be considered when determining the cost of potential property acquisitions.

Comment: Table 4-2 – 143 Kenmore and 159 Niagara Falls Blvd are listed as vacant land. The Town Board will shortly be rezoning them to parkland... not sure if this should be reflected in the DEIS now?

Response

The future NEPA/SEQR environmental document will update potential property acquisitions, including any rezoning properties.

Partial Acquisitions/Easements

Comment: To minimize cost to acquire these partial acquisitions and easements, care should be taken to minimize effect on parking, specifically for retail/restaurants. This loss

of parking can be a significant increase in the value of what will need to be offered to the property owner.

Response

The Proposed Action was developed to minimize impacts to private property. To reduce the residential and business displacements along Niagara Falls Boulevard and Maple Road, NFTA proposed the conversion of existing roadway lanes for transit use. However, roadway widening would still be required, resulting in a loss of parking for some properties. NFTA understands concerns with impacts to parking along the Proposed Action corridor and will work with specific communities and business areas to address these concerns.

Full Acquisitions

Comment: While land values/property values can be determined easier (whether by an income approach or market sales approach to value) when doing these full acquisition, business value becomes a more difficult thing to estimate in the acquisition process. Does the possible full acquisition/easement have an impact on the business operation? Will the potential displacement provide them with a better or worse location to run their business? These qualitative business issues may lead to more possible litigation.

Response

There is a process for property acquisitions, which NFTA will be adhering to. NFTA will coordinate with affected property owners and tenants to develop means to avoid or minimize property acquisitions and displacements. As described in Chapter 4 Potential Property Acquisitions & Displacements, property acquisition activities, including relocations, would be performed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) as amended and Federal Transit Administration Circular 5010.1D, Grants Management Requirements and all applicable New York State laws that establish the process through which NFTA may acquire real property through a negotiated purchase or through condemnation.

CHAPTER 5: COMMUNITY FACILITIES AND UTILITIES

Comment: Pg. 5-3, Figure 5-1 – consider adding in the new Town of Amherst Community Police and Training Facility on Bailey (the old Harley Davidson building) and the Eggertsville Youth and Community Center on Bailey as well

Response

The figure (Schools, Libraries, and Daycare Centers within the Study Area) referenced in the comment will be updated for the NEPA environmental document.

Comment: Pg. 5-10, Section 5.2.2.1 – in paragraph 2, the area south of Sheridan Drive is a direct service area with waterlines owned by ECWA. This means that maintenance

and capital improvements are the responsibility of the ECWA. The area north of Sheridan Drive is a lease managed area which means that the waterlines are owned by the town with maintenance is performed by ECWA, but capital improvements are the responsibility of the town.

Response

The Water Services section will be updated to reflect the comment in the future NEPA/SEQR environmental document.

Comment: Pg. 5-11, Section 5.2.2.2 - Sewer service is not provided by ECSD 5. The Town of Amherst provides sanitary sewer service and owns its own sewage infrastructure and treatment plant. Maintenance of sanitary sewers is performed by the Engineering Department Sewage Maintenance Division located at 1100 North Forest Road. The treatment plant is operated and maintained by the Engineering Department WPCF Division located at the plant, 455 Tonawanda Creek Road.

Response

The Sanitary and Storm Sewer Service section will be updated to reflect the comment in the future NEPA/SEQR environmental document.

Comment: Were the schools were contacted about the project? If so, may want to mention if they had any concerns.

Response

NFTA has worked with the community facilities, including Sweet Home Middle School, throughout the development of the Proposed Action to address community concerns, as described in Appendix C, Public Outreach and Coordination Report of the DEIS.

Comment: The Kadimah School on Eggert Road no longer exists. The building is now the CHC Learning Center, which is a school serving children with intellectual and physical disabilities.

Response

The future NEPA/SEQR environmental document will incorporate the transition from Kadimah School on Eggert Road to the CHC Learning Center.

CHAPTER 6: ENVIRONMENTAL JUSTICE

Comment: Table 6-4 under "Transportation: Traffic Operations" it does not acknowledge changes to traffic patterns along the corridor – for instance on Niagara Falls

Boulevard where turning movements and traffic directions will be affected, and traffic may be diverted to side streets

Response

The future NEPA/SEQR environmental document will note the potential changes to traffic patterns resulting from the Proposed Action in the environmental justice summary table.

Comment: Table 6-4 for the Indirect and Cumulative Effects row: the wording of the 4th bullet under Benefits and Adverse impacts is bothersome, in that it reads and assumes that it's the increase in property values that would create a hardship on businesses and property values close to transit stations. That's only if property owners decide to cash-out to a higher value use that displaces renters and businesses. Is it possible that there will be a decrease in property values if the owner chooses not to convert uses or rezone in places that see increased noise/vibration, on-street auto traffic congestion (due to consolidated lanes of traffic), and visual impacts of where the train infrastructure comes above ground.

Response

As described in the Project Description and Indirect and Cumulative Impacts chapters of the DEIS, the Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) transit-oriented development (TOD) study along the Proposed Action corridor identified a strong potential for TOD growth in existing and proposed station areas, and a commitment to revamp land use development patterns to support light-rail transit (GBNRTC report). A potential increase in property values is identified in the Indirect and Cumulative chapter because of the Proposed Action's potential to indirectly result in changes to land use. However, any property uses, existing or in the future, would need to be consistent with the zoning and land use plans adopted and relevant at the time.

Comment: Potential for TOD growth in existing and proposed station areas could result in potential increases in property values close to transit stations and benefits to business owners from increase foot traffic. However, this could also result in residential renters and businesses experiencing higher rents, which could result in displacement and change the neighborhood character within the study area. This information will be included in a future environmental document.

CHAPTER 7: VISUAL RESOURCES

Comment: Pg. 7-24, A materials palette or design details would be important to show the character of the proposed above ground equipment. Hopefully these issues can be examined and explained in more detail during the Design phase.

Response

Additional design details to show the character of the Proposed Action visual elements will be developed during final design.

Comment: 2. Pg. 7-29, Although the following areas are not designated as locally scenic, there are still impacts to the existing character. The introduction of above ground equipment will likely have an impact in these locations. It may be worth mentioning some of the mitigation efforts that will take place during the Design phase in a general sense.

- 1) Typical above ground rail equipment along NF Blvd, specifically at Princeton Ave to Betina
- 2) Side Platform Station at NF Blvd and Decatur
- 3) Side Platform Station at NF Blvd and Eggert Road
- 4) Substation #5 at Maple Road and Sweet Home Road
- 5) Substation #7 at Ellicott Complex
- 6) Center Platform and Substation #8 at Audubon Library "Town Center"
- 7) Walton Woods / Audubon New Community neighborhood along John James Audubon

Response

The future NEPA/SEQR environmental document will consider the potential impact to the existing visual environment at the locations referenced in the comment. Mitigation efforts, such as increased landscaping to offer further screening, will be incorporated during final design.

Comment: Pg. 7-31, In cases where the re-siting of above ground equipment is not possible, visual buffers could be used to reduce or obstruct views to the proposed project elements. These buffers include, but not limited to vegetation, berms, fences, walls or other above ground obstructions. It is assumed that the specific measures for re-siting, concealment, buffers and other mitigation will be incorporated into a subsequent design phase.

Response

Measures for re-siting, concealment, buffers and other mitigation will be considered and incorporated during final design.

Comment: In general a few sub-areas are described, but there may be more sub-areas that could be identified based on existing community character. More sub-areas would allow better determination of the effect on the surrounding context/land use and type of mitigation based on context. Again, the Town understands that this may be detailed during the design phase.

Response

The visual analysis presented representative views to analysis the Proposed Action corridor. Additional views will be considered for the future NEPA/SEQR environmental review to determine the effect on the surrounding context/land use and type of mitigation based on context.

CHAPTER 8: HISTORIC AND CULTURAL RESOURCES

Comment: Pg. 8-2, Section 8.2.1 – second paragraph, why not 50 years (instead of 45)? This is the standard for historic eligibility (see pg. 8-5 for this reference as well)

Response

The future NEPA/SEQR environmental document will reference 50 years for historic eligibility.

Comment: Pg. 8-3, Figure 8-1 – Capen is not a designated historic district, it is just recommended

Response

Comment noted. Chapter 8, Historic Resources notes that Capen Boulevard Historic District is a recommended historic district, based on a 2011 survey. The figure reference in the comment will be updated to make this distinction.

CHAPTER 9: PARKLANDS AND RECREATIONAL RESOURCES

Comment: Need to reference the Town's 2018 Recreation and Parks Master Plan

Response

A reference to the 2018 Recreation and Parks Master Plan will be added to the future NEPA/SEQR environmental document.

Comment: Pg. 9-6, Section 9.3.11 – add language about the new Alix Rice Skate Park

Response

Language about the Alix Rice Skate Park will be added to the description of the Northtown Center in the future NEPA/SEQR environmental document.

Comment: If anything the light rail will connect public recreation areas. The proposed pedestrian and multi-use paths could be connected to the regional Ellicott Creek Trailway along North Forest or Dodge Road. There is potential to connect the NFTA to the residential neighborhoods along the "Peanut Line" as well.

Response

A future environmental document will be revised to include the text noted in the comment.

Comment: Muir Woods Park is missing (to the north of the proposed student housing project at the end of the line). Again, should note that parks, community facilities, and

open space may need to be increased as the transit corridor increases the area's density.

Response

As described in Chapter 9 Parkland and Recreational Resources, open spaces and recreational resources in the chapter are identified as publicly accessible areas that can be regularly utilized by the community—including during designated periods—for active or passive recreation. Publicly accessible open spaces can be under government control or owned by a private entity so long as public access to the property is allowed. Muir Woods does not meet this definition as it is not publicly accessible.

The future NEPA/SEQR environmental document will be revised to note the potential for induced demand.

CHAPTER 11: WATER RESOURCES

Comment: Pg. 11-11, Section 11.3.4 - The first paragraph is incorrect. There are no combined sewers in the Town of Amherst. From the sentence that begins with "Most of..." to the end of that paragraph must be either revised or just removed. This seems like a good place to mention that the town is an MS4.

Response

The reference will be revised in the future NEPA/SEQR environmental document to indicate the locations of combined sewers. In addition, reference to MS4s along the Proposed Action alignment will be added to a future environmental document.

Comment: Pg. 11-14, Section 11.5.2 - Remove the section regarding combined sewers and drains.

Response

This reference will be corrected in the future NEPA/SEQR environmental document. It is believed that the Kenmore Avenue portion of the Proposed Action corridor and much of the study area along Niagara Falls Boulevard (south of Brighton Road on the west side and south of Eggert Road on the east side) is serviced by a combined sewer system.

Comment: General comment - rather than referring to unnamed ditches and creeks, consultant should add town's ditch map to the GEIS' exhibits and refer to the convention established in that map.

Response

Footnote reference to the Amherst Open Drainage Map (a.k.a. Ditch Map) will be made in the future NEPA/SEQR environmental document and the unnamed ditches will be named based on the Ditch Map names.

CHAPTER 13: TRANSPORTATION

Comment: It is understood that the direct campus-to-campus connection currently serviced by the UB Stampede bus system would be discontinued and be replaced with the new light rail service. Would UB discontinue the UB Stampede service entirely, or if not, how would their routes be adjusted for students to access services outside the direct light rail route? Would UB also continue to have school shuttles to dorms/housing outside the light rail line? Also, how would the NFTA adjust their current bus routes and stops with the light rail expansion line in place?

Response

Three of the eight NFTA Metro Bus routes that intersect the Proposed Action study area would be modified due to the Proposed Action. Those routes and their planned changes are as follows:

- Metro Bus Route 34-Niagara Falls Boulevard would provide service to the Niagara Falls and East Robinson Road area with potential to expand coverage north of the current service area.
- Metro Bus Route 35-Sheridan would continue to provide east-west service between the Blackrock Riverside Transit Hub and Niagara Falls Boulevard along Sheridan Drive. The modified service would continue east-west service along Sheridan Drive to provide access to East Amherst. The route would no longer serve UB North Campus.
- Metro Bus Route 49-Millard Suburban would provide east-west service between the Boulevard Mall on Niagara Falls Boulevard in Amherst to East Amherst. The route would also continue to provide a connection to the Millard Fillmore Hospital along Maple Road in Amherst.

In addition, some UB shuttle bus services would be terminated and users of these services would, for the most part, shift over to the new Metro Rail service. Terminated services, which are incorporated into the ridership forecasts provided in, include:

- UB Stampede (Blue Line, Main Circle to/from Flint Circle and Ellicott)
- UB Stampede North-South Express (Yellow Line, Main Circle to/from Flint Circle with stops at Maynard, Service Center Road, and Goodyear Residence Hall¹)

Other UB shuttle services would remain in operation including the Lee-Ellicott Express (Red Line), and the North Campus Shuttle.

NFTA has and will continue to coordinate with UB regarding service changes.

¹ Stop at Goodyear is made in the southbound direction only.

Comment: Pg. 13-6 – John James Audubon bullet – the Town only owns the section of John James Audubon Parkway north of Ellicott Creek, the rest is owned by UB/NYS

Response

The ownership of Audubon Parking will be updated in the future NEPA/SEQR environmental document.

Comment: Pg. 13-16, Section 13.4 - Call it a bridge superstructure replacement project instead of a reconstruction effort. Remove project scope sentence entirely as it is for the most part incorrect. Should also mention that we are reconstructing the Frontier/JJ Audubon Intersection into a roundabout.

Response

The referenced project will be updated in the future NEPA/SEQR environmental document. In addition, the reconstruction of the Frontier/JJ Audubon intersection into a roundabout will be added to the future NEPA/SEQR environmental document.

Comment: Pg. 13-17 – First paragraph – there is a declining retail market which may slow the increase of traffic in the No Action scenario

Response

The future NEPA/SEQR environmental document will consider the effect of a declining retail market on future traffic operations.

Comment: Pg. 13-24, first paragraph – mention traffic diversion to side streets?

Response

Traffic diversions to side streets will be referenced in the future NEPA/SEQR environmental document, as appropriate.

Comment: Pgs. 13-25, 26 & 27 – may want to consider having the bike lanes being protected/curbed
Pg. 13-28 – have bicycle accommodations incorporated?

Response

There is not sufficient space on Niagara Falls Boulevard, Maple Road, and Sweet Home Road to build a curb or bollards that separate the bike lanes and vehicular travel lanes without resulting in additional property acquisitions.

A new multi-use bike and pedestrian trail along Audubon Parkway would be constructed with the Proposed Action. The noted graphic will be revised to clarify the multi-modal trail.

Comment: Pg. 13-30, Table 13-14 – discussion or evaluation of diversion of traffic from NF Blvd to side streets?

Response

Where changes in traffic patterns are planned, the Proposed Action is expected to divert some traffic from existing roads onto adjacent streets. The following locations identify streets where some traffic could divert from and to, as a result of changes made to traffic patterns due to the Proposed Action.

- Niagara Falls Boulevard (between Eggert Road and Maple Road)
The changes to diversions along this section are expected to be minimal. A median already exists along Niagara Falls Boulevard restricting turning movements to/from residential streets. Diversion occurs under the existing condition with traffic using residential streets to reach Boulevard Mall or other destinations along Niagara Falls Boulevard, and those conditions would likely continue. The elimination of a travel lane is not expected to have an impact on traffic flow, as two lanes in each direction would be maintained and additional left turn capacity would be provided under the Proposed Action.
- Maple Road (between Niagara Falls Boulevard and Sweet Home Road)
The changes to diversions along this section are expected to be minimal as there are not many alternatives to Maple Road. Diverting traffic would likely continue to use Alberta Drive, Meyer Road, and Bowmart Parkway, which are equipped to handle traffic. With a signalized intersection at Hillcrest Drive, traffic diversion would likely continue to use Hillcrest Drive and Emerson Drive to divert from the intersection of Maple Road and Sweet Home Road. Moving the Metro Rail underground at the intersection and providing level-of-service improvements as part of the Proposed Action are being done to reduce delay at that intersection and reduce the potential for traffic diversion.
- Sweet Home Road (between Maple Road and Rensch Road)
The changes to diversions along this section are expected to be minimal as there are not many alternatives to Sweet Home Road and traffic impacts are expected to be minimal. Traffic destined for the University at Buffalo North Campus may divert to using the Flint Road entrance off Maple Road, but those roadways are equipped to handle the traffic load.
- John James Audubon Parkway (between Lee Road and I-990)
There are very few alternatives to John James Audubon Parkway for traffic to divert. With levels-of-service along the roadway expected to continue to be good and major access point maintained, traffic diversion is not expected to be impacted.

CHAPTER 14: NOISE

Comment: Pg. 14-1, last sentence – not sure we agree that traffic would only divert to major roadways
Pg. 14-18, Section 14.4.2.3 – what about the student housing development and if

that is constructed before the maintenance/storage facility?
Pg. 14-18, Section 14.5.1 – a new future receptor (a multi-story hotel) at Maple and Sweet Home Roads should be evaluated for potential adverse impacts
Pg. 14-19 What is the specific mitigation proposed for those residences within 172 feet of the surface tracks along John James Audubon Parkway? Never mentioned.
Top sentence – will gates and signals be audible? Will new ADA audible PED signals also be installed in proximity to residential areas?

Response

Additional mitigation options including wayside noise barriers, removal of at-grade crossings, and an alternate track alignment utilizing the southbound lanes of the John James Audubon Parkway were considered and were found to either not be feasible or not provide additional benefit. Vegetation planted as part of the Proposed Action is not provided for the purposes of noise mitigation and has not been credited with any reduction in the project noise exposure levels.

The signal for at-grade crossing north of the proposed Ellicott Station would be flashing warning signs and not audible. Pedestrian signals would be provided along Audubon Parkway; however, the signals would not be audible.

Comment: First paragraph – have vegetative attenuators been evaluated near affected residents?

Response

Vegetation planted as part of the Proposed Action is not provided for the purposes of noise mitigation and has not been credited with any reduction in the project noise exposure levels.

CHAPTER 15: VIBRATION

Comment: Pg. 15-2, Table 15-1 – the “Residential annoyance, infrequent events” seems like it would be regular/ frequent? This table is somewhat hard to understand.

Response

As per the Federal Transit Administration’s Noise Guidance Manual, community response to vibration correlates with the frequency of events and, intuitively, more frequent events of low vibration levels may evoke the same response as fewer high vibration level events. This effect is accounted for in the ground-borne vibration and noise impact criteria by characterizing projects by frequency of events. Event frequency definitions are as follows:

- Frequent events – more than 70 events per day (most rapid transit)
- Infrequent events – 30-70 events per day (most commuter trunk lines)
- Infrequent events – fewer than 30 events per day (most commuter rail branch lines)

CHAPTER 19: CONSTRUCTION EFFECTS

Comment: Add something regarding “financial assistance (grants?) for businesses during construction” to Measures to Avoid/Minimize/Mitigate section

Check Amherst Zoning Code (Section 138-5M) for construction time periods (9:00pm on weekdays)

Response

The future NEPA/SEQR environmental document will note the potential for financial assistance during construction and verify the Amherst Zoning code for construction time periods.

Comment: Indirect Cumulative Effects – add “revised local zoning ordinances to allow/accommodate land use changes” to Measures to Avoid/Minimize/Mitigate section.

Response

“Revised local zoning ordinances to allow/accommodate land use changes” will be added as a mitigation measure for indirect and cumulative effects in a future environmental document.

CHAPTER 20: INDIRECT AND CUMULATIVE IMPACTS

Comment: Pg. 20-4, Last paragraph – Growth of assessed value doesn’t mean more tax revenue, it redistributes it. This sentence should include Tonawanda too

Response

The future NEPA/SEQR environmental document will consider the redistribution of tax revenue as a result of the Proposed Action.

Comment: Need to include impact on municipalities needed to revise zoning near stations 2. Pg. 20-5

Response

The future NEPA/SEQR environmental document will consider the required station rezonings near the Proposed Action stations.

Comment: First paragraph – project could redistribute values to this area, but what about what happens to the other areas of Town? What have we seen in the existing corridor?

Response

The future NEPA/SEQR environmental document will consider the impacts to areas outside of Proposed Action corridor.

Comment: Section 20.3.2, first sentence – the adverse indirect effects are not discussed (i.e. disruption to existing businesses and residents throughout the long construction period)

Response

The future NEPA/SEQR environmental document will consider the indirect effects (e.g., disruption to existing businesses and residents throughout the construction period) of the Proposed Action.

Comment: Last paragraph: The Town did not assign the designation, it is a designated Federal Opportunity Zone

Response

NFTA will revise the referenced text to reflect designation as a Federal Opportunity Zone in the future NEPA/SEQR environmental document.

The Town is pursuing a planning effort in this area to have an overall vision and Action Plan for future redevelopment.

Comment: Coordination is not with Tonawanda and UB on this project directly. A goal of the Boulevard Central District work is to encourage redevelopment and revitalization of the area.

Response

The future NEPA/SEQR environmental document will describe the Boulevard Central District as an overall vision and Action Plan for future development with a goal to encourage redevelopment and revitalization of the area

CHAPTER 21: COMMITMENT OF RESOURCES

Comment: It may be appropriate to give an update on the total cost of construction and an estimate of the cost of operations. These costs will impact the region, county, Amherst and Tonawanda. Recommend they be considered and addressed in this document.

Response

NFTA is preparing a cost estimate for the construction, as well as the operations and maintenance of the Proposed Action. These costs will be reported in the future NEPA/SEQR environmental document. The cost of the project will be considered in light of its expected benefits, which include serving 30,438 riders daily. It provides a new, more reliable transit choice with improved transit travel times and access to other existing transit services and Metro Rail across the corridor. It will also connect communities and provide access to housing and employment throughout the corridor and beyond. It results in a cost-effective project when evaluating the cost per user benefit.

OTHER COMMENTS

Comment: Substations are shown in approximate locations along the proposed light rail expansion line. The Town understands that these are general locations, but hopes that the NFTA would work with the Town regarding any future redevelopment that may occur where substations are shown or required. These substations should be visually concealed or buffered to fit with the surrounding character and/or be incorporated with new development in these areas.

Response

Comment noted. NFTA will continue to work with the Town regarding any future redevelopment adjacent to the proposed substations. The substations would be visually concealed or buffered, as appropriate, to fit with the surrounding community character.

3 Erie County Comments

Comment: Erie County greatly appreciates NFTA extending the deadline for submitting written comments to April 10th in light of the COVID 19 Pandemic that has been the focus of our attention recently.

Response

Comment noted.

Comment: In general, Erie County supports the expansion of the NFTA's Light Rail System to extend the service area, increase ridership, and provide a low emission/emission free mode of transportation throughout the region. As noted by the Erie County Environmental Management Council, a regional transportation network connected by Metro Rail will reduce greenhouse gas emission related to vehicle miles traveled, provide car-free access to many of our region's most popular destinations, and increase western New York's ability to bring in funding and Transit Oriented Development incentives that encourage smart growth principles.

Response

The Proposed Action has been identified for many of the reasons stated above. The Proposed Action, described in detail in Chapter 1 of the DEIS, would expand the existing Metro Rail light-rail transit (LRT) from its current terminus at University Station on the University at Buffalo (UB) South Campus, along Kenmore Avenue, Niagara Falls Boulevard, Maple Road, and Sweet Home Road, through the UB North Campus to John James Audubon Parkway and Interstate 990 (I 990). Ten stations are proposed as part of the 7-mile extension, two of which would contain a park & ride facility—and a light maintenance/storage facility is proposed at the end of the line. The Proposed Action would generally exist within existing roadway right-of-way, as shown in the typical sections. Some portions would be underground, under existing roads.

The Proposed Action would provide an efficient, reliable, and accessible high capacity public transit alternative to the automobile for the towns of Amherst and Tonawanda. LRT remains the preferred mode due to its ability to better meet the project's purpose and need, higher ridership projections, and higher user benefits, including a one-seat ride.

The definition of the Proposed Action is the result of the environmental analysis, feedback from agencies, and the continued involvement of the community. This is true of comments received during the formal comment period, included in this Response to Comments Report, as well as continuing outreach and coordination throughout the Preliminary Engineering phase of the project. Throughout the development of the Proposed Action, refinements were made to reduce project

impacts, reduce overall project costs, and to maintain a cost-effective project while providing a high-quality system.

Comment: While the Proposed Action will provide an efficient means to travel between portions of the corridor (i.e. UB North Campus to the Boulevard Mall area), Erie County is concerned that as proposed, this LRT Extension may not replace automobile traffic for those commuters to/from northern Erie County to downtown Buffalo without some option for an express service. As noted, the service along the 7-mile extension from the UB South Campus to the I-990 will be 21 minutes. Then add another 22-minute commute from the UB South Campus to the Inner Harbor Station downtown and we have a nearly 45-minute ride for commuters using the Metro System to ride to/from downtown. Given that this same commute in a car is approximately 25 minutes, we are concerned that commuters will continue to use personal automobiles rather than taking Metro.

One way that public transit operations address this issue in other cities is to offer an express train service that bypasses certain stops in order to provide a faster and more reliable ride for the long? distance commuters. Erie County fully realizes that the corridor width available does not allow for a 3rd track that could be used for an express train. However, we ask that the NFTA evaluate whether the use of cross-over connections with appropriate computer safety controls that could allow for trains to pass others, thus allowing for an express option. This type of system is used where freight and passenger rail use the same corridor. It is not clear from the Draft EIS if this type of Operational System could work along the current system.

Response

The Proposed Action is intended to provide service to each of the ten proposed stations. No express service is planned at this time.

Comment: If it is determined that it is not possible to provide for an express LRT service, NFTA should realize that future ridership will be heavily influenced by the price of gasoline, the price/availability of parking in downtown Buffalo, and the proliferation of ridesharing apps. Another factor that will influence ridership on the LRT extension is whether UB will continue to offer the Blue Line Bus Service between the North and South Campuses and between Campuses and Mall/shopping destinations. The Draft EIS does not appear to include any discussion of the future of this travel option. Continuation of the Blue Bus Line service would likely reduce LRT ridership as students may opt for the hourly/on demand transportation alternative rather than walking to an LRT Station and waiting for a train.

Response

With the Proposed Action, some UB shuttle bus services would be terminated and users of these services would, for the most part, shift over to the new Metro Rail service. Terminated services, which are incorporated into the ridership forecasts include the Blue Line service.

Comment: Do the ridership projections used by GBNRTC/NFTA account for the recent proliferation of Uber/Lyft and other ridesharing apps? If ridership projections pre-date June 2017 when ridesharing services became legal in NYS, then these projections may need to be revisited to account for current trends in usage within the Amherst/Tonawanda corridor

Response

The traffic modeling will be updated during the NEPA environmental process and will use the latest available GBNTRC data. Erie County will have an opportunity to review the traffic analysis as a Cooperating Agency.

Comment: Of primary concern to Erie County is the potentially significant and critical traffic congestion and roadway safety impacts that will result from the proposed project, causing intersection failures and public safety challenges. While adverse impacts to traffic congestion and safety are likely to result at specific locations/intersects along the entire route, our primary concern is on impacts on County Roads, including Maple Road and Sweet Home Road.

Response

Based on the traffic analysis conducted for the DEIS, the Proposed Action would not result in adverse traffic impacts at any intersection during the weekday AM peak hour, weekday PM peak hour, or Saturday Midday peak hour. The traffic modeling will be updated during the NEPA environmental process with opportunities for review by Erie County as a Cooperating Agency.

Comment: The Draft EIS for the Metro Rail Expansion project addresses the transportation issues and mitigation measures along the preferred corridor only for the Light Rail. As noted in the report those roads Erie County is responsible for along this corridor are Brighton Road/Maple Road and a portion of Sweet Home Road. Mitigation measures suggested within the proposed rail corridor, allowing the light rail to be established within the existing footprint of the road and eliminating a lane of traffic. This elimination of a lane of traffic will undoubtedly have a diversion effect on traffic patterns and increase the amount of traffic on minor roads intersecting the corridor. The consideration of this effect was not addressed during this conceptual design phase; it should be addressed during the preliminary/final design phases. Given the length of the design phases for this project, estimating the future patterns of traffic should be attainable.

Response

Where changes in traffic patterns are planned, the Proposed Action is expected to divert some traffic from existing roads onto adjacent streets. The following locations identify streets where some traffic could divert from and to, as a result of changes made to traffic patterns due to the Proposed Action.

- Niagara Falls Boulevard (between Eggert Road and Maple Road)
The changes to diversions along this section are expected to be minimal. A median already exists along Niagara Falls Boulevard restricting turning

movements to/from residential streets. Diversion occurs under the existing condition with traffic using residential streets to reach Boulevard Mall or other destinations along Niagara Falls Boulevard, and those conditions would likely continue. The elimination of a travel lane is not expected to have an impact on traffic flow, as two lanes in each direction would be maintained and additional left turn capacity would be provided under the Proposed Action.

- Maple Road (between Niagara Falls Boulevard and Sweet Home Road)
The changes to diversions along this section are expected to be minimal as there are not many alternatives to Maple Road. Diverting traffic would likely continue to use Alberta Drive, Meyer Road, and Bowmart Parkway, which are equipped to handle traffic. With a signalized intersection at Hillcrest Drive, traffic diversion would likely continue to use Hillcrest Drive and Emerson Drive to divert from the intersection of Maple Road and Sweet Home Road. Moving the Metro Rail underground at the intersection and providing level-of-service improvements as part of the Proposed Action are being done to reduce delay at that intersection and reduce the potential for traffic diversion.
- Sweet Home Road (between Maple Road and Rensch Road)
The changes to diversions along this section are expected to be minimal as there are not many alternatives to Sweet Home Road and traffic impacts are expected to be minimal. Traffic destined for the University at Buffalo North Campus may divert to using the Flint Road entrance off Maple Road, but those roadways are equipped to handle the traffic load.
- John James Audubon Parkway (between Lee Road and I-990)
There are very few alternatives to John James Audubon Parkway for traffic to divert. With levels-of-service along the roadway expected to continue to be good and major access point maintained, traffic diversion is not expected to be impacted.

The consideration of potential diversions will be further considered during preliminary and final design.

Comment: The No Action Condition in 2040 was the condition used for comparison and a design condition. Growth rates were obtained from GBNRTC. However, this trafficBlue2063 model does not make mention of the Amherst Opportunity Zone. This zone is located along Maple Road and its intersection with Niagara Falls Blvd. The opportunity zone is a rezoning plan to densify the neighborhood. This densification will influence the traffic in the area. Given the longevity of the project and lengthy schedule for the design, this rezoning and its effects on traffic, needs to be taken into consideration throughout the design phases. Mitigation measures may need to be modified and the effects on the minor streets intersecting the proposed rail corridor analyzed to prevent adverse effects on the neighborhood.

Response

The No Action condition is used as a starting point to provide a comparison to the Proposed Action in terms of costs, benefits, and impacts. The No Action condition

would consist of a future scenario with no changes to the Proposed Action corridor, beyond the projects that are already committed and planned by others.

The Town of Amherst released a Draft Generic Environmental Impact Statement (GEIS) in August 2019 to evaluate the cumulative impacts of growth within the Amherst Boulevard Central District. A Final GEIS was released in November 2019, which includes traffic mitigation measures. As stated in the January 2020 Findings Statement, the mitigation strategies should be reevaluated if/when the future light-rail transit expansion is implemented by Niagara Frontier Transportation Authority and may require the preparation of a Supplemental GEIS. NFTA will continue to coordinate with the Town of Amherst on mitigation measures to reduce adverse traffic impacts.

Comment: Section 5 Future Conditions - Forecasted growth is based upon data from GBNRTC model. There is no indication in the text if the Amherst Opportunity Zone and its effects of densifying the neighborhood are considered. Predictions for the traffic on Maple Road and Eggert Road have significant increases. If the opportunity zone was not considered, in these growth rates the analyses done are undoubtedly underestimating the adverse effects on traffic.

Response

The traffic modeling will be updated during the NEPA environmental process and will use the latest available GBNTRC data. Erie County will have an opportunity to review the traffic analysis as a Cooperating Agency.

Comment: Section 4.4.1 of the Draft EIS identifies 15 parcels that would need full acquisition, and an additional 148 parcels that would require a partial acquisition. Of those parcels that would be acquired in full (and thus would be displaced) 10 are commercial uses and one is a transportation/utility use. The Draft EIS notes that these commercial facilities include retail (4), auto care (3), funeral administration (1), restaurant (1), and commercial office (1). The Draft EIS does not identify how many jobs would be lost or displaced. The Final EIS needs to address the potential loss (or displacement) of jobs and the resultant direct/indirect economic impacts within the towns of Amherst and Tonawanda. It is likely that some or all of the property acquisition will need to be done via eminent domain. While the relocation of a business is compensatory under NYS Real Property Law, the loss of business is not. This may result in significant additional hardships for businesses that are forced to relocate, even relatively short distances. How will NFTA (or New York State) assist local businesses who face loss of business as a result of the Proposed Action?

Response

The future NEPA/SEQR environmental document will address the potential loss (or displacement) of jobs and the resultant direct/indirect economic impacts within the towns of Amherst and Tonawanda.

The Proposed Action was developed to minimize impacts to private property; however, some displacements will be necessary, as presented in Chapter 4,

Potential Property Acquisitions and Displacements of the DEIS and noted in the comment. NFTA will coordinate with affected property owners and tenants to develop means to avoid or minimize property acquisitions and displacements. Potential Property Acquisitions and Displacements, property acquisition activities, including relocations, would be performed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) as amended and Federal Transit Administration Circular 5010.1D, Grants Management Requirements and all applicable New York State laws that establish the process through which NFTA may acquire real property through a negotiated purchase or through condemnation.

Comment: Section 3.5.2 (Tax Revenue) of the Draft EIS acknowledges that full acquisition of properties would result in the loss of tax revenue, but that the loss would be offset by long-term increases in property values (which will generate increased tax revenue). The Final EIS should estimate the short-term loss in tax revenues, and provide a timeline for when the projected long-term increase in property values/tax revenue would be generated. It is likely that the tax revenue loss would be felt in the near term, while any increases in property values may not be realized until after the LRT Extension is operational in 2040.

Response

The future NEPA/SEQR environmental document will consider the short-term loss in tax revenues, and provide an anticipated timeline for when the projected long-term increase in property values/tax revenue would be generated.

Comment: The Final EIS should also provide a timeline for when parcels would be acquired. If parcels are identified for acquisition, but not actually acquired until 5 or 10 years into the project design, then it is likely that current landowners will not invest in their businesses nor would they likely be able to secure financing for growth or expansion due to the likelihood of being acquired/displaced. Providing an anticipated schedule for acquisition would allow property owners time to prepare.

NFTA will need to coordinate with towns of Amherst and Tonawanda to ensure the partial acquisition does not impact any zoning issues/variances such as minimum parking requirements, setbacks, etc.

Response

The future NEPA/SEQR environmental document will provide a timeline and identify next steps related to the potential property acquisition. In addition, NFTA will continue to coordinate with the towns of Amherst and Tonawanda on the partial acquisition does not impact any zoning issues/variances such as minimum parking requirements, setbacks, etc.

Comment: Section 20.3.1 of the Draft EIS addresses the indirect effects of the Proposed Action on Socioeconomics and Induced Growth. This section includes the following statement that the "development induced by the Proposed Action would depend on revising zoning and land use policies in Amherst and Tonawanda and eliminating

development constraints such as sanitary and storm sewer capacity issues. Assuming land use and infrastructure requirements would be met, TOD could occur, resulting in new growth.” Does this mean that the positive socioeconomic impacts associated with the Proposed Action (i.e. TOD) will only occur if the Towns revise their zoning and land use policies AND address sanitary and storm sewer capacity issues? The Final EIS should clarify if local land use actions and infrastructure upgrades are a prerequisite for realizing TOD and new economic growth via the Proposed Action. The Final EIS also should clearly identify what specific infrastructure upgrades would be necessary to realize this future growth, who is responsible for advancing these projects, and provide an estimated cost of making these improvements.

Response

The Town of Amherst has identified sanitary and stormwater capacity issues and is developing a plan for infrastructure upgrades. In addition, GBNRTC and NFTA are advancing transit-oriented development planning efforts including zoning and land use policy recommendations. The future NEPA/SEQR environmental document will include an update on land use and infrastructure upgrades.

Comment: Section 20.3.1 also indicates that ‘induced retail development could add about \$8.7M in additional sales tax revenue for the State of New York and \$10.3M in additional sales tax revenue for Erie County. The Final EIS should clarify if these are tax revenue estimates are annual and when these revenues would begin to be generated (before or after system operation in 2040).

Response

The future NEPA/SEQR environmental document will provide more detail on potential tax revenue associated with the Proposed Action.

Comment: What is the status of the Section 106 Consultation with the NY State Historic Preservation Office (SHPO)? As noted in Section 8.6.1 that the Assessment of Impact is not yet complete. Section 8.6.2 indicates that the determination of effects on historic resources ‘will be prepared, pending SHPO’s concurrence on eligibility’. Section 8.5 addresses how NFTA Consultants solicited public comments on historic or archaeological issues relating to the Proposed Action yet acknowledges that these groups have not yet reviewed the forthcoming survey report. There is no mention of the required SHPO review or consultation to date, or if any mitigation measures are warranted.

Response

During a public meeting held at Sweet Home Middle School on September 24, 2019, the project team solicited comments and questions regarding the presence of historic built resources and archaeological sites within the project’s Area of Potential Effects; the potential for the project to affect these resources and sites; and requests for members of the public or agencies to become consulting parties. The draft reconnaissance survey report for built resources was submitted to the NY

State Historic Preservation Office (SHPO) in April 2020. After receiving any comments from the SHPO, a revised version of this report, which will include determinations of eligibility, will be submitted to consulting parties for review and comment. Consulting parties will be given an opportunity to review and comment on the project's effects to historic properties, which include built resources and archaeological sites that are listed in or eligible for listing in the National Register of Historic Places, as well as any avoidance or minimization measures that are needed to avoid adverse effects. Consulting parties will be provided with a copy of the effects report prior to SHPO submittal; a teleconference or web-based meeting may also be scheduled. If adverse effects are unavoidable, consulting parties will be contacted to contribute ideas to the agreement document that will include mitigation measures, which are only warranted if the project has an adverse effect to historic properties. Note that the specifics of this process will be dependent on funding resources that direct whether state or federal (i.e., Section 106) processes, which also have slightly different terminology, will be followed.

While it is likely that intact archaeological resources have been destroyed by past construction activities along the corridor, potential impacts (vibration, visual, community character, etc.) of the Proposed Action on historic resources (and associated mitigation measures) should be fully addressed in the Final EIS. The Final EIS should also include the SHPO Determination letter.

Response

Comment noted. Potential impacts of the Proposed Action on historic resources (and associated mitigation measures) will be fully addressed in future environmental documents and include a SHPO Determination letter.

Comment:

Erie County acknowledges the potential noise impacts and mitigation measures proposed by NFTA. While mitigation is possible in some area, noise will be an unavoidable impact in residential areas along Niagara Falls Boulevard and in the Audubon area. The combination of noise and visual connectivity in residential areas will impact property values. While properties within walking distance of a station may see an increase in value given TOD incentives once the system is operational, other residential neighborhoods that have direct visual frontage to the train will likely see a decrease in property values if noise (and light intrusion) is not mitigated. Property values could further be impacted by changes in traffic flow that would prohibit many residents along Niagara Falls Boulevards from making left-hand turns from their driveways.

In addition to the noise mitigation measures proposed in the Draft EIS, Erie County suggests that mitigation measures also include on-site noise monitoring during construction and establishment of a 3rd party monitor or community liaison to help address and resolve specific noise issues that may occur during construction and operation.

Response

Additional outreach and monitoring will be conducted during construction of the Proposed Action. The mitigation measures noted in the comment will be considered and documented in the future NEPA/SEQR environmental document.

Comment: Sewerage Service - Pg. 5-11, Section 5.2.2.2 - Sewer service in the project area is not provided by Erie County Sewer District 5. The Town of Amherst provides sanitary sewer service and owns its own sewage infrastructure and treatment plant.

Response

Comment noted. Future environmental documentation will clarify that the Town of Amherst provides sanitary sewer service and owns its own sewage infrastructure and treatment plant.

Comment: Snow removal on Platforms - Section 1.4.3 of the Draft EIS provides a description of the stations and types of platforms proposed. While we defer to NFTA to determine the appropriate type of platform and amenities for each of the 10 proposed stations, it is not clear how snow removal would be handled as there is no place to store the snow except to clear off the platforms and onto either the tracks or the street. Where the proposed stations are in the median of Niagara Falls Boulevard and Maple Road, it appears from illustrations provided that there will be a barrier to separate customers on the platforms from cars on the street. Is sufficient space provided to ensure the snow can be managed to allow for customer and vehicular safety.

Response

The conceptual engineering for the proposed stations includes space for snow storage. In addition, the Proposed Action includes right-of-way for the snow removal and storage. Additional details will be determined during preliminary and final design.

Comment: Updated cost estimates and revenue sources - While Erie County fully realizes that accurate cost estimates cannot be made until the Preliminary and Final design processes are advanced, it would be helpful for the Final EIS to provide some information on updated anticipated costs of construction, property acquisition, and operations (including the new fleet of rail vehicles). It is assumed that funding would be primarily federal, but the Final EIS should indicate what funding (both\$ and%) would be anticipated from state, county and local municipal sources, including fare revenue and other sources of revenue generated by NFTA.

Response

NFTA is preparing a cost estimate for the construction of the Proposed Action. This cost will be reported in the future NEPA/SEQR environmental documentation.

Comment: Construction Effects - Section 19 of the Draft EIS addresses Construction phasing and methods. If possible, the Final EIS should provide approximate timelines for preliminary/final design, preconstruction, construction and testing phases leading up to the planned in-service date of 2040.

Response

The NEPA environmental document will include approximate timelines for preliminary/final design, preconstruction, construction and testing phases.

4 Federal Transit Administration Comments

Comment: Based on our review and in anticipation of NFTAs requesting Federal funding for the MRE, the Federal Transit Administration (FTA) will support the development of the federal environmental analysis of the Project under the National Environmental Policy Act (NEPA) and other applicable laws.

FTA will serve as the lead agency for the NEPA analysis. It is FTA's opinion that the project should proceed as an Environmental Impact Statement (EIS). Furthermore, we believe that the NEPA EIS should analyze three alternatives: (1) a no-build, (2) a bus rapid transit system, and (3) a light rail expansion along the proposed project corridor. Additionally, FTA would be supportive of utilizing a third-party contract under 23 U.S.C. § 139(j) to assist FTA's review of the NEPA EIS and other applicable documents.

To ensure that all the necessary benchmarks are met as it relates to both the environmental analysis and any applications for Federal funding, my office would like to schedule a series of project meetings to develop a reasonable schedule that identifies a clear path forward.

Response

NFTA would like to thank the FTA for their desire to become the lead agency for the Metro Rail Expansion project. NFTA appreciates the interest and the acknowledgement of this important regional and state transit project. The following bullet points outline a sequential approach to best position NFTA and FTA for success in advancing into the Project Development phase of the Capital Investment Grant (CIG) New Starts program, and incorporate FTA's request for additional consideration of a Bus Rapid Transit (BRT) alternative for the Project.

- Coordinate with FTA on the environmental re-evaluation work necessary to incorporate BRT as part of the environmental review process, comparing BRT to the No Action Alternative and light-rail transit (LRT), utilizing the SEQR DEIS as the base document.
- Meet with University at Buffalo (UB) and other corridor stakeholders on BRT service and operations.
- Conduct public open houses/workshops and conduct Public Hearing per NEPA requirements.
- Complete the NEPA environmental process with a Record of Decision (ROD) prior to requesting entry into Project Development.

5 New York State Department of Environmental Conservation Comments

Comment: The DEIS should also discuss the United States Army Corps of Engineers (USACE) Section 408 approval process for the modification or alteration of a federal flood protection project. This process runs parallel to the NYSDEC Article 16 Flood Control Land Use Permit approval process.

Response

The future NEPA/SEQR environmental document will mention Article 16 and Section 408 under both the Existing Condition and Proposed Action floodplains sections.

Comment: As indicated in the DEIS, the project may require a Freshwater Wetlands permit pursuant to Article 24 of the New York State Environmental Conservation Law for any proposed impacts to NYS regulated freshwater wetlands and/or their regulated 100-foot adjacent areas. The following comments relate to this jurisdiction.

- Section 11.3.1 (Existing Conditions - Freshwater Wetlands): This section successfully describes and differentiates between federal and state jurisdictional wetlands by dividing them into two separate subsections (11.3.1.1 & 11.3.1.2)
- Section 11.3.1.2 (Existing Conditions – State Freshwater Wetlands):

The reference to three NYSDEC wetlands, especially the mention of Wetland TE-17 being mapped beyond the study area, is confusing. This sentence should be revised to refer simply to the other two NYSDEC wetlands (TE-22 & TE-34) that fall within or just outside the study area.

Response

The referenced sentence will be revised in the future NEPA/SEQR to refer to the other two NYSDEC wetlands (TE-22 & TE-34) that fall within or just outside the study area.

Comment: While the last sentence of this paragraph notes that Wetland TE-22 and TE-34 are not within the water resources study area, which extends out 150 feet from the Proposed Action Alignment (as noted in Section 11.2), previous discussions related to this project have indicated that these wetlands could be impacted by the proposed project. Moreover, the last paragraph on page 11-5 (Section 11.3.1.1) notes that relatively several contiguous federal wetlands “intersect with” Wetlands TE-22 and TE-34 suggesting that the old NYSDEC mapping/delineation (i.e., the fixed wetland boundaries associated with the recently reissued Muir Woods permit)

is wrong and one or both wetlands extends into the project area. Since a new NYSDEC jurisdictional determination for this project may very well determine that the project area extends into the NYSDEC jurisdictional area under Article 24, this section should acknowledge the potential presence of NYS wetlands in the project study area.

Response

Given the current layout of the tracks and the proposed storage/light maintenance facility location north of I-990, the footprint of the Proposed Action appears to be within 100 feet of these wetlands. The future NEPA/SEQR environmental document will be revised to reflect the most recent alignment.

With respect to connections between the federal and state wetlands, NFTA did not perform a delineation of the wetlands north of the I-990 and defers to the delineation performed for the Muir Woods project. The future NEPA/SEQR environmental document will clarify this.

Comment: Considering the potential NYSDEC jurisdiction under Article 24 and the mention of Corps permitting for the proposed mixed-use development (Muir Woods) in that last paragraph on page 11-5 (Section 11.3.1.1), Section 11.3.1.2 should be revised to include a note about the status of the NYSDEC's Article 24 permit for Muir Woods, which is enclosed with this letter.

Response

The future NEPA/SEQR environmental document will include information about the status of the NYSDEC Article 24 permit for Muir Woods.

Comment: Section 11.5.1 (Proposed Action – Freshwater Wetlands): The Article 24 permitting text in the second to last paragraph of Section 11.5.1 on page 11-14 should be placed in its own paragraph. The reference to exempted activities in that paragraph should be removed. Instead, the section should note that any Article 24 permitting would follow a somewhat parallel path with the USACE Section 404 permitting process (through a Joint Application for Permit). This section should also note the possible need for NYSDEC to complete a compatibility and weighing standards assessment as part of the Article 24 permitting process.

Response

This information will be added to the future NEPA/SEQR environmental document.

Comment: Section 11.6.1 (Mitigation – Wetlands and Surface Waters): A separate paragraph listing NYSDEC's mitigation requirements listed in Part 663.5 (enclosed) should be included in this section since these requirements are very different from those of

USACE (e.g., NYSDEC likely would not accept the in-lieu-fee arrangement described in the second paragraph of this section).

Response

This information will be added to the future NEPA/SEQR environmental document.

6 New York State Department of Transportation Comments

GENERAL

Comment: NYSDOT has concerns regarding the proposed reduction in travel lanes, most notably on Niagara Falls Boulevard. We are concerned that the modeling done to date may not be reflective of the actual impacts that will occur to Level of Service (LOS) and Delay. We feel that more evaluation and verification of the traffic modelling is required.

Response

Comment noted. Following the release of the DEIS, the Federal Transit Administration accepted the role of lead agency. As such, the environmental review will shift from the State Environmental Quality Review Act (SEQR) to a joint federal and state environmental analysis of the project under the National Environmental Policy Act (NEPA), and other applicable laws and SEQR. Additional traffic modeling will be conducted, including an opportunity for review by the Federal Highway Administration and NYSDOT as Cooperating Agencies.

Comment: The DEIS should clearly discuss the complete costs associated with the construction of this new project.

Response

Comment noted. The NFTA is preparing a capital cost estimate, which will be included in future environmental documents.

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA), STATE ENVIRONMENTAL QUALITY REVIEW (SEQR) PROCESS, FEDERAL HIGHWAY ADMINISTRATION (FHWA) AND NYSDOT MAIN OFFICE INVOLVEMENT

Comment: The Scoping Document and DEIS discuss the intent to procure future federal funding, thus NFTA is progressing the SEQR DEIS to also adhere to NEPA requirements. NYSDOT agrees that this is the advisable approach. However, we would also suggest that FHWA be involved now through Federal Transit Administration (FTA), as FHWA will be very interested in reviewing the VISSIM models to confirm the traffic impacts on these Federal-aid eligible roadways.

Involving FHWA now, rather than after the SEQR EIS is completed would minimize the likelihood that any major comments FHWA has will significantly change the proposed alternative. Based on prior recent experience with an EIS, FHWA had significant comments and went to the extent of running a “parallel” VISSIM model of their own to verify the results and impacts of the traffic studies

in the EIS. Currently, NYSDOT does not have the VISSIM traffic modeling files for review.

Response

Comment noted. Following the release of the DEIS, the Federal Transit Administration accepted the role of lead agency. As such, the environmental review will shift from the State Environmental Quality Review Act (SEQR) to a joint federal and state environmental analysis of the project under the National Environmental Policy Act (NEPA), and other applicable laws and SEQR. Additional traffic modeling will be conducted, including an opportunity for review by the Federal Highway Administration and NYSDOT as Cooperating Agencies.

OTHER PROJECTS

Comment: NFTA DEIS should consider adjacent projects by other entities. There is currently a NYSDOT project under construction (sponsored by Town of Amherst) which removes the eastern JJ Audubon bridge over Ellicott Creek and replaces it with a pedestrian structure (PIN 5761.72). It appears NFTA wants to use one (1) of the existing bridges to carry the new line. We recommend ongoing and proposed NYSDOT and local projects be considered and discussed in detail prior to finalizing rail expansion plans.

Response

Comment noted. NFTA will continue to coordinate with NYSDOT to ensure that ongoing and proposed NYSDOT and local projects be considered prior to finalizing rail expansion plans.

CHAPTER 4: POTENTIAL PROPERTY ACQUISITIONS AND DISPLACEMENTS

Comment: The DEIS does not discuss acquisition costs even though the project requires significant Right-of Way acquisitions.

Response

The NFTA is preparing a capital cost estimate, which includes an estimate for right-of-way acquisition costs. The capital cost estimate will be included in future environmental documents.

Comment: The means of conveyance of property rights needs to be evaluated. NYSDOT has not identified how NFTA will obtain rights for use of NYSDOT ROW.

Please explain if NYSDOT needs to convey to NFTA the property acquisitions that fall within NYSDOT's jurisdiction.

Any new acquired ROW that is necessary to install improvements for relocated NYSDOT facilities should be conveyed to NYSDOT.

Response

Comment noted. NFTA recognizes NYSDOT's property acquisitions procedures and will continue to work with NYSDOT during right-of-way acquisition and final design.

Comment: University at Buffalo is a major stakeholder on this project. NYSDOT has had difficulty in having SUNY transfer property rights to NYSDOT in the past. This should be a point of discussion with the University.

Response

Comment noted. As a major stakeholder, NFTA has coordinated with the University at Buffalo (UB) throughout the project. UB serves on the project Technical Advisory Committee. In addition, the UB Working Group, which includes faculty, planning staff, and NFTA staff, reviews project materials and provides feedback related to the project. In addition, UB staff from the UB working Group coordinates with UB Leadership with project updates.

CHAPTER 6: ENVIRONMENTAL JUSTICE

Comment: 51% of communities affected are defined as EJ communities based on minority populations and household income/poverty lines. 67% of full acquisitions would be in EJ areas and 61% of partial acquisitions would be in EJ areas. The DEIS states that this project does not have a disproportionate impact on EJ areas, but with such significant percentages, there must be an explanation. Will residents and businesses receive enough compensation for displacement to re-establish themselves in another area? It is anticipated that indirect EJ areas may also experience rent increases. We recommend discussing how this will impact the communities subject to rent increases in the DEIS.

Response

Under the Proposed Action, property acquisitions would occur within both environmental justice communities and non-environmental justice communities. Although there is a higher percentage of acquisitions in environmental justice communities, the impact is not disproportionately high. Property acquisitions will be further refined during preliminary and final design. All activities related to acquisitions and displacements would be conducted in conformance with the New York State Eminent Domain Procedure Law (EDPL). In addition, acquisitions and displacements would comply with the Uniform Relocation and Real Property Acquisitions Policies Act of 1970 (42 United States Code [USC] 4601), as amended (the Uniform Act) and Public Law 105-117. The Uniform Act provides for uniform and equitable treatment for persons displaced from their homes and businesses, and it establishes uniform and equitable land acquisition policies.

Comment: As with any transit improvement, changes in market conditions would occur as a result of the Proposed Action, in addition to the transit improvement itself. Potential for TOD growth in existing and proposed station areas could result in potential increases in property values close to transit stations and benefits to business owners from increase foot traffic. However, this could also result in residential renters and businesses experiencing higher rents, which could result in displacement and change the neighborhood character within the study area.

NYS DOT recommends including a discussion on providing alternative bus routes or other reasonable accommodations during construction in the DEIS.

Response

Three of the eight regular Metro Bus routes that intersect the study area would be modified due to the Proposed Action. Those routes and their planned changes are as follows:

- Metro Bus Route 34-Niagara Falls Boulevard would provide service to the Niagara Falls and East Robinson Road area with potential to expand coverage north of the current service area.
- Metro Bus Route 35-Sheridan would continue to provide east-west service between the Blackrock Riverside Transit Hub and Niagara Falls Boulevard along Sheridan Drive. The modified service would continue east-west service along Sheridan Drive to provide access to East Amherst. The route would no longer serve UB North Campus.
- Metro Bus Route 49-Millard Suburban would provide east-west service between the Boulevard Mall on Niagara Falls Boulevard in Amherst to East Amherst. The route would also continue to provide a connection to the Millard Fillmore Hospital along Maple Road in Amherst.

Comment: DOT recommends discussing air quality impacts on EJ communities in the DEIS.

Response

The Proposed Action would not result in adverse impacts on air quality.

CHAPTER 8: HISTORIC AND CULTURAL RESOURCES

Comment: Regarding Cultural Resources, any locations of tunneling, new station or electric sub-station construction will require archaeological screening with the potential for multiple survey locations. The DEIS describes the various phases of surveys that can be required, but NFTA's plans remain unclear regarding how they would progress through the stages. The report seems to imply that NFTA could skip ahead to Phase III Data Recovery after consultation with State Historic Preservation Office (SHPO). NFTA must follow the Section 106 process if there are any federal funds associated with the project, and if there are not federal funds

than the Section 14.09 process should be followed unless there are no state funds associated with the project.

Response

Comment noted. The cultural resources review is being completed in accordance with Section 106 of National Historic Preservation Act. Additional steps beyond those completed to date will be taken to determine the presence or absence of archaeological resources meeting the eligibility requirements of the National Register and that unavoidable adverse effects will be mitigated through completion of a data recovery and/or an alternative strategy in consultation with the SHPO and consulting parties. The process of identifying and evaluating resources and mitigating adverse effects will proceed systematically as the design is advanced and funding becomes available and that information regarding the process will be made available through the public participation process.

CHAPTER 10: NATURAL RESOURCES

Comment: Section 10.3.3.1 indicates that Agency Correspondence is provided in Appendix D; however, the Agency Correspondence is in Appendix E. The text should be updated to identify the correct appendix.

Response

Reference has been corrected.

Comment: Section 10.3.3.1 indicates that the Official IPaC Species List is provided in the appendices. The document located in the Agency Correspondence is the IPaC Resource List, not the Official Species List. Either the text should be updated to indicate the current document provided in the appendices, or the IPaC Official Species List should be provided in the appendix.

Response

The referenced text will be updated in a future environmental document to indicate the current document provided in the appendices (the IPaC resource list).

Comment: Section 10.5 indicates that there will be 0.1-acre of forest impacts; however, there is no discussion of any impacts to the northern long-eared bat (NLEB). The NLEB is federally listed as "threatened" in Erie County. If the project is federally funded and involves tree removals, a suitable habitat assessment is required and concurrence from U.S. Fish and Wildlife Service (USFWS) for the tree removals must be obtained. Documentation in the DEIS of the Endangered Species Act (ESA) Section 7 process for the NLEB should be provided, if concurrence has already been obtained. If concurrence has not been obtained, the steps and timeframe for obtaining concurrence should be discussed in the DEIS. The NFTA should also

be aware that any species federally listed is automatically state listed as threatened or endangered.

Response

The northern long-eared bat (NLEB) is identified as threatened (state and federally) in Sections 10.3.3, 10.3.3.1 and in Table 10-2. The NLEB was identified through the IPaC system for this area. The Endangered Species Act (ESA) Section 7 process for the NLEB has not been performed at this time. It is anticipated that the Section 7 process for the NLEB will be performed during preparation of final design after specific details of the design are known. Text indicating the timeline will be incorporated in future environmental documentation.

CHAPTER 11: WATER RESOURCES

Comment: The proposed project area is serviced by combined sewer systems (sanitary, industrial and storm runoff) destined to a treatment plant but exceeds capacity during major rainstorms and snowmelt. Excess runoff discharges into nearby waterbodies, untreated. The DEIS states that runoff quantities are not expected to increase significantly, but it appears that there will be a significant increase in impervious surface area based on the acquisitions and the nature of the project. Methods to update, separate and combine sewer systems in order to accommodate the current inflow, as well as account for the increased surface area and pollutant runoff must be established.

Response

There are no combined sewers in the Amherst section of the project and most of the sewers throughout the rest of the project corridor have been separated already. The portions of the project along Kenmore and at the Main Street crossing are still combined. These identified combined sewer areas are in more populated areas which are already mostly impervious; therefore, in the combined sewer areas runoff quantities are not expected to increase significantly. During final design, this project will consider green and grey infrastructure measures that would reduce the water quantity including consideration of separation of combined sewers.

Comment: The project calls for a significant increase in outfalls. These outfalls need to be managed and stipulations put in place for those established in NYSDOT'S Right-of-Way.

Response

The number of outfalls is not known at this time. Any outfalls will be designed to New York State standards and proper NYSDEC SPDES requirements.

Comment: A comprehensive plan should be implemented to monitor and manage oils and other pollutants from additional NFTA operations, possibly in the form of a Spill Prevention Control and Countermeasure (SPCC) Plan.

Response

The applicability of a Spill Prevention Control and Countermeasure Plan will be assessed based on the oil storage required for operations to be determined during final design of the Proposed Action.

Comment: The DEIS indicates the need for a New York State Department of Environmental Conservation (NYSDEC) Article 16 permit for the JJ Audubon bridge work, which will be required. However, a United States Army Corps of Engineers (USACE) Section 408 permit may also be needed and should be identified in the DEIS.

Response

Comment noted. Work taking place within the 1989 Ellicott Creek Flood Control Protection Project easement would require an Environmental Conservation Law Article 16 Permit from the NYSDEC and a Section 408 Permission from the USACE.

CHAPTER 13: TRANSPORTATION

Comment: Based on the proposed alternative, NFTA should assume that all eleven (11) of the NYSDOT traffic signals will likely require replacement. Replacement signals should be the far-side mast arm type.

Full sign replacements will be expected in the Niagara Falls Boulevard and Sweet Home corridor maintained by NYSDOT.

NYSDOT needs to know if overhead lane designation signs (overhead sign structures) will be included in the project scope.

This DEIS should discuss any impact to existing bridges and signs and how that impact will be mitigated. This would include the Sweet Home/ I290, and I990 Audubon Pkwy area.

The Sheridan/Eggert, Niagara Falls Blvd/Sheridan and Niagara Falls Blvd/Eggert intersections are currently operating with a coordinated timing plan. In addition, NYSDOT is currently in the design phase for implementation of a corridor wide signal timing coordination plan for Niagara Falls Blvd. The LRT project will interrupt coordination plans twice every 10 minutes which is expected to significantly reduce the effectiveness of coordinated signals. This should be reflected in the traffic models.

Response

NFTA will continue to coordinate with NYSDOT on signage, including both existing and replacement, and signal timing during the NEPA environmental process and final design.

Section 13.2.1

Comment: Regarding Traffic Diversions, the DEIS states: A review of the GBNRTC's regional travel demand model indicates that potential diversions would not be significant, and that traffic would most likely divert to major roadways outside the study area.

In general, this section should be clarified and expanded upon. Traffic diversions should be addressed as part of the EIS if diversions are expected due to a reduction in capacity on NFB. In addition, the study area should be clearly defined. If some north-south traffic diversions are expected due to reduced capacity on NFB, then the study area should include these routes - such as North Bailey and Colvin Ave. There do not appear to be many other north-south choices for traffic diverting from NFB.

Response

Where changes in traffic patterns are planned, the Proposed Action is expected to divert some traffic from existing roads onto adjacent streets. The following locations identify streets where some traffic could divert from and to, as a result of changes made to traffic patterns due to the Proposed Action.

- Niagara Falls Boulevard (between Eggert Road and Maple Road)
The changes to diversions along this section are expected to be minimal. A median already exists along Niagara Falls Boulevard restricting turning movements to/from residential streets. Diversion occurs under the existing condition with traffic using residential streets to reach Boulevard Mall or other destinations along Niagara Falls Boulevard, and those conditions would likely continue. The elimination of a travel lane is not expected to have an impact on traffic flow, as two lanes in each direction would be maintained and additional left turn capacity would be provided under the Proposed Action.
- Maple Road (between Niagara Falls Boulevard and Sweet Home Road)
The changes to diversions along this section are expected to be minimal as there are not many alternatives to Maple Road. Diverting traffic would likely continue to use Alberta Drive, Meyer Road, and Bowmart Parkway, which are equipped to handle traffic. With a signalized intersection at Hillcrest Drive, traffic diversion would likely continue to use Hillcrest Drive and Emerson Drive to divert from the intersection of Maple Road and Sweet Home Road. Moving the Metro Rail underground at the intersection and providing level-of-service improvements as part of the Proposed Action are being done to reduce delay at that intersection and reduce the potential for traffic diversion.
- Sweet Home Road (between Maple Road and Rensch Road)
The changes to diversions along this section are expected to be minimal as there are not many alternatives to Sweet Home Road and traffic impacts are expected to be minimal. Traffic destined for the University at Buffalo North Campus may divert to using the Flint Road entrance off Maple Road, but those roadways are equipped to handle the traffic load.

- John James Audubon Parkway (between Lee Road and I-990)
There are very few alternatives to John James Audubon Parkway for traffic to divert. With levels-of-service along the roadway expected to continue to be good and major access point maintained, traffic diversion is not expected to be impacted.

Section 13.3.4, 13.4.4

Comment: It should be noted the Niagara Falls Boulevard Pedestrian Safety Enhancement Project (PIN 5308.38) will be let in June 2020 and completed by spring of 2021.

Response

Comment noted.

Comment: NYSDOT has completed Photogrammetric Base mapping for a project on Niagara Falls Boulevard (PIN 5308.38). Please advise if Niagara Frontier Transportation Authority (NFTA) wishes to obtain these survey files if they have not already been provided by NYSDOT. The DEIS does not identify the design criteria that will be used for this project.

Response

NFTA has requested and received the mapping referenced in the comment.

Section 13.5.1-Traffic Operations

Comment: The DEIS states (page 13-23) "These lane reductions would directly affect traffic because the same number of cars that travel along Niagara Falls Boulevard would have fewer lanes to use. However, in the long term, traffic would improve because more people would shift from vehicles to the light-rail, which would create less traffic." Please provide the estimated number of trips shifting from automobile to LRT with supporting documentation/analysis methodology in this regard,

Response

The traffic modeling will be updated during the NEPA environmental process with opportunities for review by NYSDOT as a Cooperating Agency.

Section 13.5.1.1

Comment: This section assigns the letter grades to the lowered level of service. Please summarize the delay numerically for a better representation of the change in delay (in seconds).

Highway Capacity Manual, Chapter 19 'Signalized Intersections' considers using Control Delay and Volume-to-Capacity ratio to characterize LOS for a lane group. We would like you to add v/c ratio in additional columns on the tables and provide

v/c values adjacent to the lane groups, particularly for those lane groups showing LOS 'E'.

Response

The traffic modeling will be updated during the NEPA environmental process with opportunities for review by NYSDOT as a Cooperating Agency.

Signalized Intersections along Niagara Falls Blvd (NFB) and Maple Rd.

Comment: Conceptual Plan indicates large negative offsets for NBL and SBL turn lanes on NFB intersections and for EBL and WBL turn lanes and on Maple Rd intersections due to the center running alignment. The meeting summary of Aug 26, 2019 mentioned that WSP would reevaluate ability of simultaneous left turns with geometry. Please provide details of the evaluation and updated traffic analysis details at intersection movement level.

Response

The Proposed Action will incorporate design improvements to eliminate off-sets on Niagara Falls Boulevard and Maple Road intersections.

Comment: NFB & Longmeadow Rd: Conceptual Plan indicates addition of NB Left turn lane at the intersection. The Build Traffic Volumes plots provided in April 2019 do not show NB left turn or U turn traffic volume. Please provide updated Build Traffic Volume plots, and intersection movement level traffic analysis report.

Response

As part of the additional traffic modeling during the NEPA environmental process, NFTA will be collecting unsignalized intersections data and expanding the VISSIM model.

Comment: NFB & Sheridan Dr: NYSDOT studied the Niagara Falls Blvd corridor from I-290 to Sheridan Drive for a scenario that reduced the SB corridor from 3 lanes to 2 lanes using Synchro/SimTraffic optimization/coordination. It was observed that the average queues on the SB approach at the intersection for the scenario were approximately 550'. These queues extended to Alameda Ave for both SB lanes in the Scenario simulation. The existing condition (3 SB lanes) simulation queues were 100', 300' and 100'. These results are available for NFTA's review. We are concerned regarding SB Left and SB U turn traffic movements at this intersection in the Future Build scenario presented in the draft EIS. As per the traffic volume data-plots provided by NFTA in April 2019, the SBL+SBU traffic increases from 250 vph in PM Future No Build (FNB) scenario to 377 vph (including 182 vph making U turn) in PM Future Build (FB) scenario. The Saturday MD volume indicates increase from 223 vph in FNB to 412 vph (including 259 vph making U turn) in FB scenario. Further, the project proposes to eliminate 1 SB traffic lane.

Please provide intersection level detailed report to confirm that the SBL+SBU turn movement in NFB scenario is accommodated adequately with acceptable LOS, and

that SBL+SBU traffic would not spill over and block SBT+R traffic, and that the SB backup would not block the commercial driveways on the west side of NFB. Please include the queue length results in the report

Response

NFTA will continue to coordinate with NYSDOT on the traffic analysis, including providing detailed intersection-level reports, during the NEPA environmental review.

Comment: NFB & Treadwell Rd: Conceptual Plan does not indicate a SB Left turn lane. However, the Build Traffic Volume plot shows SBL and SB U turn traffic. Approximately 100 cars make this movement currently, and therefore access should be maintained.

Response

The Proposed Action conceptual design will be revised to shift the southbound left turn lane to the north side of the proposed Boulevard Mall station.

Comment: The Treadwell Station shows a combination left/through on Niagara Falls Blvd. at Treadwell. This requires split phasing on US 62 and warrants further analysis. (Figure 1-17).

Response

The Proposed Action conceptual design plans will be revised to eliminate left/through on Niagara Falls Boulevard at Treadwell.

Comment: NFB & Maple Rd: The project proposes to increase the number of WBL turn lanes from existing 1 lane to 2 lanes. Please provide intersection movement level traffic analysis details and signal timing/phasing plan for NFB & Maple Rd.

Maple Rd & N Bailey Ave: The project proposes to increase the number of SBL turn lanes from existing 1 lane to 2 lanes. Please provide intersection movement level traffic analysis details and signal timing/phasing plan for Maple Rd., & N. Bailey Ave.

Response

NFTA will continue to coordinate with NYSDOT on the traffic analysis, including providing detailed intersection-level reports, during the NEPA environmental review.

Comment: Maple Rd – Alberta to Niagara Falls Blvd: During the LRT expansion project development phase, DOT had commented about the necessity of reducing WB Maple Rd from 3 travel lanes to 2 travel lanes, when the proposed LRT alignment was to run in the mall property on the southside of Maple Rd. The comment was addressed by NFTA/WSP as “Currently, with the LRT in the mall property, WB Maple Rd could continue to have 3 travel lanes west of Alberta Dr. That could be

discussed and revised as the project moves forward". The Conceptual Plan in the draft EIS shows only 2 WB travel lanes west of Alberta Dr. Please revise the plan showing 3 WB lanes as existing or provide reasons for eliminating 1 travel lane on WB Maple Rd in this segment.

Response

After further review, the Proposed Action conceptual design can only accommodate two westbound travel lanes west of Alberta Drive.

Comment: Audubon Pkwy & Yaeger Dr (Library access): Conceptual Plan indicates Audubon Pkwy NB approach having 1 thru and 1 shared thru-right lane, but only 1 NB receiving lane beyond the intersection. There should be 2 receiving lanes, or the NB approach should have 1 thru and 1 right-only lane. Please correct the drawing.

Response

The Proposed Action conceptual design will be revised to include one thru and one right-only lane for the northbound approach.

Comment: Audubon Pkwy & Sylvan Pkwy, Partridge Run: The Conceptual Plan shows stop bars on each approach indicating All Way Stop Control (AWSC). The stop bars at the Partridge Run/Sylvan Parkway approaches are setback approximately 100 ft. from the edge of the Audubon Pkwy travel lane. NYSDOT has operational and safety concerns with the AWSC (with setback stop bars) and coordination with the LRT crossing. Additional detail will be required as design progresses.

Response

The Proposed Action conceptual design will be revised to remove the setback stop bars. NFTA will continue to coordinate with NYSDOT during the environmental review process and final design.

Comment: Audubon Pkwy & Frontier Rd, N Forest Rd, Library Access, Dodge Rd (Signalized Intersections): WB/NB approaches at these signalized intersections have stop bars marked at over 100 ft from the edge of the Audubon Pkwy travel lane, whereas the Audubon Pkwy approaches have stop bars marked very close to the intersection. Provide analysis results for these intersections.

Response

NFTA will continue to coordinate with NYSDOT on the traffic analysis, including intersection results at the locations referenced in the comments, during the NEPA environmental review.

Comment: Audubon at Frontier, N. Forest, Library Access and Dodge Road; Northbound right-turn lanes and southbound left-turn lanes should be created for

vehicles to queue in when movement is blocked by a passing train. Otherwise, the queue will impede all traffic on the Audubon.

Response

The Proposed Action conceptual design will be revised during the NEPA/SEQR environmental process and will consider turn-lanes.

General Traffic and Safety Concerns

Comment: A crash analysis should be completed as part of the DEIS to determine existing crash patterns and how they may impact the proposed alternative. As part of Traffic Impact Studies required by NYSDOT, a crash analysis should be completed per Chapter 5 (Section 5.3.4) of the NYSDOT Highway Design Manual. This analysis will assist in determining appropriate crash countermeasures to be incorporated into the project and to ensure that the proposed project will not exacerbate any existing crash patterns or create new operational/safety concerns.

Response

A crash analysis will be completed as part of the future NEPA/SEQR environmental review.

Comment: Reducing the southern segment of NFB, South of Sheridan Dr. to one lane in each direction will require the roadway to function at capacity. Therefore, any signals in this segment will have much longer cycle lengths. This will create longer queues and longer wait times for pedestrians to cross. The VISSIM model needs to be expanded to include the entire corridor during the next phase of project development.

Response

As part of the additional traffic modeling during the NEPA environmental process, NFTA will be expanding the VISSIM model.

Comment: NYSDOT recently completed a major reconstruction project to add a Two-way Left Turn Lane (TWLTL) on Sweet Home Road. The continuous turn lane was included as a countermeasure to the crash history along this section of road. NYSDOT has safety concerns with the proposed removal of the turn lane along this corridor as shown in figures 1-10 and 1-11. Sweet Home Rd.

Response

The conceptual design for the Proposed Action will be updated to include a center turn lane on Sweet Home Road from the I-295 bridge north to the proposed signalized intersection for the Sweet Home Station.

Comment: The DEIS (Figure 1-19) shows a signalized intersection at the Sweet Home station. A signal cannot be installed without meeting MUTCD signal warrants. Signal

warrant analysis needs to be included in the DEIS or further in project development.

Response

Signals will be addressed during the NEPA environmental process.

Comment: Figure 1-19 and Table 1-4 should be revised to match the latest proposed lane configuration on Sweet Home Road, which includes 2 lanes NB from Maple Rd. to Rensch Rd.

Table 13-12 Proposed Action: Traffic Capacity Change: Add a row to the table for Sweet Home Road indicating the elimination of TWLTL from Maple Road to Rensch Rd.

Response

The referenced tables will be revised in the future NEPA/SEQR environmental document to reflect the Proposed Action conceptual design.

Comment: Figure 2-4 shows a Transit Station established north of the I-990 Ramps on the Audubon Pkwy. Section 2.4.1.2 calls for a Center Platform (design plan calls for platform on east side) that would impact all four I-990 ramps. More detail is required showing the impact of the LRT and the Muir Woods development on these expressway ramps. LOS analysis should be provided at the ramp intersections with JJ Audubon.

Response

NFTA has been coordinating with the developer for the Muir Woods mixed-used development, which incorporates the proposed I-990 Station as part of the future development.

Comment: The tunnel entrance is shown on NFB north of Princeton Drive. A left turn lane for turns from NFB into Eastbound Princeton Drive should be included.

Response

There is not enough length to include left turn lane for turns from Niagara Falls Boulevard into eastbound Princeton Drive.

Comment: The following intersections along NFB will be Right in and Right Out only:

- Ford Avenue
- Cambridge Avenue
- Paige Avenue
- Oxford Avenue
- Chalmers Avenue
- Yale Avenue

- Lincoln Park Drive
- Ruth Avenue
- Highland Avenue
- Harrison Avenue
- Moore and Betina Avenue

Consider channelizing the side road intersection approaches with a center median to discourage wrong-way driving.

Response

Side street intersection design for the Proposed Action will be coordinated during the NEPA environmental process.

Comment: The plans show the LRT crossing Alberta Drive intersection on the South side of Maple and relocating the pedestrian crossing further south. This will push the crosswalk at least 50' further away from the intersection. Vehicles coming from the intersection will have higher speeds and lower visibility when encountering pedestrians. Countermeasures to enhance pedestrian safety need to be considered.

Response

The Proposed Action conceptual design will be revised during the NEPA environmental process to include pedestrian connectivity and provide a Z crossing west of Alberta Drive.

Section 5.4.3, Appendix F

Comment: The DEIS mentions the below mentioned network changes:

- Maple Rd and N. Bailey Ave: Northbound – Additional thru lane from Argosy Drive
- Sweethome Rd and Rensch Rd: Westbound additional left turn bay and change shared through/left turn lane to through lane only. These changes are not indicated on the Conceptual Plan in the DEIS.

Response

The referenced network changes will be evaluated during the NEPA environmental process.

CHAPTER 14: NOISE

Comment: The area near housing and the University at Buffalo Campus buildings should be monitored closely throughout the construction period. A coordination plan with

residents, students, and maintenance staff should be established early in case any problems occur.

Response

Comment noted. The NFTA has established a stakeholder outreach program that will continue to work with the University at Buffalo through the completion of design work and construction to further reduce impacts and develop more detailed mitigation and enhancements. This will a coordination plan with residents, faculty, students, and maintenance staff.

CHAPTER 16: AIR QUALITY

Comment: 16.3.1 This section is incorrect for ozone. Erie County is an orphan non-attainment area for ozone. Table 16-2 needs to be updated for ozone. The last sentence of the paragraph, "Since Erie and Niagara Counties are currently in attainment for all NAAQS, no SIP is required, and no regional conformity determination is required." This statement is incorrect. Background information is available here: <https://gbnrtc-mpo-osl2.squarespace.com/air-quality>. We suggest this sentence be replaced with the following, or something similar:

- Erie County is currently an orphan non-attainment area for ozone. This project, under PIN 5824.82, was included in the 2020-2024 TIP by amendment on 1/8/2020. The project is included on the Statewide Transportation Improvement Plan (STIP) as exempt from air quality conformity per 40 CFR Part 93.126, as a mass transit project involving "reconstruction or renovation of transit buildings and structures". The conformity determination process completed for the 2020-2024 GBNRTC TIP, as amended, and 2050 Long Range Transportation Plan demonstrates that these planning documents meet the Clean Air Act and transportation conformity requirements for the 1997 ozone NAAQS and State Implementation Plan (SIP).

Response

The suggested text will be added to future environmental documentation to better describe attainment status for ozone.

Comment: 16.3.3 The NYSDEC 2018 Ambient Air Quality Report is available. This section and table 16-3 should be updated. Also, the source link under table 16-3 does not work and should be corrected and updated with the 2018 link, which is provided here for convenience: https://www.dec.ny.gov/docs/air_pdf/2018airqualreport.pdf

Response

Future environmental documentation will be updated with 2018 monitoring data to reference the NYSDEC 2018 Ambient Air Quality Report.

Comment: 16.4.1 Where did the Vehicle Miles Traveled (VMT) projections come from? Chapter 3 was mentioned in the text, but we could not find the reference.

Response

The VMT projections for the Proposed Action were provided by GBNRTC, and the project team used a series of adjustments to develop the No Action condition VMT estimate. Chapter 3 is mentioned to provide more explanation about future development, but VMT is not presented in that chapter.

Comment: 16.4.2.1 The link in reference #9 does not work and should be updated.

Response

The reference will be updated in future environmental documentation.

Comment: The link in reference #10 does not work and should be updated.

Response

The reference will be updated in future environmental documentation.

Comment: The same Health Effects Institute (EHI) links are used on page 16-12 within the text and do not work and should be updated.

Response

The reference links will be updated in future environmental documentation.

Comment: Section 16.4.2.1 can likely be shortened. It may be confusing to the public to include so much information on "information that is unavailable". The Mobile Source Air Toxics (MSAT) research section of the FHWA memo may be enough text to include in the DEIS, which is mentioned in earlier sections.

https://www.fhwa.dot.gov/ENVIRONMENT/air_quality/air_toxics/policy_and_guidance/msat/

Response

Future environmental documentation will be updated with language from the MSAT Research section of the FHWA memo, as suggested.

Comment: 16.4.3 Environmental Protection Agency (EPA) Guidelines for Modeling Carbon Monoxide from Roadway Intersections should be linked, and a footnote made and/or an EPA document ID should be included (EPA-454/R-92-005). The link is provided here for convenience:

<https://www3.epa.gov/ttn/scram/guidance/guide/coguide.pdf>

Response

The suggested link and document ID will be included in the reference section of the of a future environmental document.

Comment: EPA User's Guide to CAL3QHC (Version 2.0): A Modeling Methodology for Predicting Pollutant Concentrations near Roadway Intersections (Revised) should be linked, referenced and/or EPA document ID should be included (EPA-454/R-92-006). The link is provided here for convenience:
<https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=00003319.txt>

Response

EPA User's Guide to CAL3QHC (Version 2.0): A Modeling Methodology for Predicting Pollutant Concentrations near Roadway Intersections (Revised) will be added to the reference section of a future environmental document.

Comment: 16.4.3.1 EPA's Guidelines for Modeling Carbon Monoxide from Roadway Intersections should be linked, and a footnote made and/or EPA document ID should be included (EPA-454/R-92-005). The link is provided here for convenience:
<https://www3.epa.gov/ttn/scram/guidance/guide/coguide.pdf>

Response

Link and document ID will be included in the reference section of a future environmental document.

Comment: 16.4.3.1 A reference to table 13-14, 13-15 and 13-16 should be included in this section.

Response

References to the noted transportation tables will be added to a future environmental document.

Comment: It appears that the intersections of Niagara Falls Boulevard at Sheridan Drive, Maple Road at Sweet Home Road, and Audubon Parkway at Forest Road were excluded from Carbon monoxide (CO) microscale analysis. Section 16.4.3.1 of the report indicates that the worst overall intersection delay is weekday PM. The intersections noted above, as well as the intersections listed in the report are at a Level of Service (LOS) of D or worse. A LOS of D or worse is typically the criteria for CO microscale analysis for NYSDOT projects statewide.

Response

Following the New York State Department of Transportation's The Environmental Manual (TEM), Chapter 1.1, a CO microscale/hot-spot screening procedure was used to screen the intersections predicted to be affected by the Project. As per the referenced guidance, if an intersection is predicted under the transportation analysis to have a build Level of Service (LOS) C or better, the intersection is deemed to pass the screening and no CO analysis is warranted.

If the intersection is predicted to have LOS D or below in the build alternative, the intersection is further screened by the following criteria:

- A 10 percent or more reduction in the source-receptor distance

- A 10 percent or more increase in traffic volume on affected roadways
- A 10 percent or more increase in vehicle emissions
- Any increase in the number of queued lanes
- A 20 percent reduction in speed, when predicted average speed is at 30 mph or less

As presented in Chapter 13, Transportation of the DEIS, six intersections are estimated to experience LOS D or below, but the projected volume increase at each intersection is less than a 10 percent. No intersections in the study area met any of the other remaining criteria for further modeling, particularly no intersections showed an increase in traffic volumes of 10% or more.

Comment: 16.4.3.2 This paragraph references table 16-6 and 16-7. These references should be renamed 16-5 and 16-6 to match the tables.

Response

Table references will be updated in a future environmental document.

Comment: For clarification, the National Ambient Air Quality Standards (NAAQS) should be added to the paragraph after table 16-6. They are listed as a note under each table but may be missed by the reader.

Response

The referenced text will be updated to describe that all predicted concentrations are below the 1-hour NAAQS of 35 ppm and the 8-hour NAAQS of 9 ppm.

Comment: 16.6 Many of these references are duplicated in the text. Furthermore, there are footnotes up to page 16-11, and links within the text starting on page 16-12. We recommend one (1) option be used throughout the chapter.

Response

A future environmental document will be updated with a consistent format for references.

CHAPTER 17: ENERGY

Comment: "Direct" energy should only include vehicle fuel. Maintenance of the facility, the energy required to operate the rail system should be included in "indirect" energy with construction energy. This paragraph should be edited. See the following link for additional information: <https://www.epa.gov/greeningepa/greenhouse-gases-epa>

Response

The referenced paragraph will be added to the Energy chapter of a future environmental document to more accurately describe direct and indirect energy use.

Comment: 17.2 See Above Comment for the definition of direct energy.

Response

The energy writeups of a future environmental document will be revised to attribute correct activities to direct or indirect energy consumption.

Comment: 17.5.2 See Above Comment for the definition of direct energy. Table 17-1 only includes direct energy, which is calculated from VMT. This analysis is correct. However, the writeups in this chapter needs to reflect that.

Response

The energy writeups of a future environmental document will be revised to more accurately discuss impacts from direct and indirect sources of energy consumption. The title of Figure 17-1 was also revised.

CHAPTER 18: HAZARDOUS AND CONTAMINATED MATERIALS

Comment: 18.1 Asbestos is mentioned in a regulatory context but not in the rest of the chapter. If the project has the potential to modify utilities or remove signal or pedestrian poles, there is a chance to encounter Asbestos-Containing Material (ACM) in the form of transit utility lines or caulk. The affected utility companies should be contacted to make this determination. A site assessment may be needed to determine the presence of other suspected ACM. Such as, the demolition of any structures or modifications to bridges. Should these assessments reveal the presence of ACM, all removals will require special handling and disposal in accordance with New York State Department of Labor (NYSDOL) Industrial Code Rule 56. Abatement would require a licensed person or a licensed consultant Asbestos Designer.

Response

The ACM survey will be performed in accordance with ICR 56 during final design after the right-of-way impacts related to the Proposed Action are clearly defined and buildings and other structures have been confirmed for acquisition and demolition or renovation.

CHAPTER 19: CONSTRUCTION EFFECTS

Comment: 19.3.2 Tunnel Blasting – The document should state if there will be a policy in place to notify communities prior to blasting occurrences. And how soon they will be notified prior to blasting activity. Define what the radial distance would be to warrant a notification. The NFTA should also be aware, with regards to blasting,

NYS DOT in the past has had issues with CO leaking in basements within 1,000 feet surrounding blasting areas. This required monitors in basements of residents. We recommend addressing the possible need for monitoring during blasting in the DEIS.

Response

The Proposed Action specifications will require the contractors to compile a notification list including nearby police stations, fire stations, schools and other organizations needing or requesting advance notification of the daily blasting schedule. Per OSHA regulations, a series of loud warning signals would be made prior to each blast; the warning signal (a 1-minute series of long blasts) 5 minutes prior to the blast signal, the blast signal (a series of short blasts) 1 minute prior to the shot and the all clear signal (a prolonged blast) following the inspection of blast area.

While hazardous gases were not encountered during the construction of the existing NFTA tunnels, hazardous gases are known to exist in certain rock formations in the region and site specific investigations will be made prior to construction to better define the potential for gases. Per OSHA regulations for underground construction, air quality measurements will be made at a minimum, prior to each shift and prior to reentry after each blast. While monitoring of basements is not anticipated, the need will be reassessed in the site-specific investigations.

Comment: Reduction in parking will be both temporary and permanent, depending on the area. The document should discuss if additional parking be available elsewhere, and if mobility to community resources would be restricted.

Response

The Proposed Action alignment would traverse the median of Niagara Falls Boulevard and Maple Road, and roadway widening would be required. As a result, potential impacts would occur to existing private parking facilities along these roadways. Based on the conceptual design, 27 parcels could have their existing parking reduced to some degree. Approximately 875 parking spaces could be affected. Many of these parcels have additional space that could be used for relocating the affected parking spaces. NFTA understands concerns with impacts to parking along the corridor and will work with specific communities and business areas to address these concerns.

Construction of the Proposed Action would cause temporary impacts to community facilities (i.e. police stations, fire stations, schools) due to access restrictions and temporary blocking of adjoining roadway intersections. The availability of alternative routes, in addition to the temporary duration of construction periods, would minimize the disruptions to the community facilities. Furthermore, alternative routes would ensure that access to the community facilities is maintained during construction.

Comment: Dust suppression during construction should be discussed, and methods such as water, strict speed limit enforcement or Calcium Chloride.

Response

Comment noted. The future NEPA/SEQR environmental document will identify mitigation measures for dust suppression.

Comment: There is potential to rip up sidewalks during construction. Discuss whether the project will repair and update any damaged pedestrian facilities to comply with Americans with Disabilities Act Accessibility Guidelines (ADAAG) and state laws and policies.

Response

Pedestrian facilities impacted during construction of the Proposed Action would be updated to comply with Americans with Disabilities Act Accessibility Guidelines and state laws and policies.

Comment: Ped/Bike detours will be an integral part of traffic control plans.

Response

Comment noted.

CHAPTER 20: INDIRECT AND CUMULATIVE IMPACTS

Comment: The project will result in long term habitat loss as wildlife corridors may be destroyed or fragmented. Most habitat should be restored once disturbed areas are re-vegetated." Describe if there will be an official restoration plan in place, including a timeline and a map to demonstrate the percentage of habitat to be fully restored of which will be disturbed. State whether NFTA will have to submit annual/semi-annual restoration reports to NYSDEC or other federal or state authority to demonstrate progress.

Response

The Proposed Action corridor currently exists as developed highway and municipal roadway. The Proposed Action would not result in significant changes to the right-of-way that would restrict or impact wildlife movement. The removal of habitat would be limited to where the track alignment would have to account for turning movements (such as when the Metro Rail would enter the University at Buffalo North Campus). The need for a restoration plan has not been identified at this time. This type of requirement would be developed during final design efforts through consultation with the New York State Department of Environmental Conservation or other regulatory agencies.

As described in the Amended Findings Statement for the Muir Woods Development, mitigation measures will be implemented for the mixed-used development to minimize impacts to wildlife resources. These measures include:

- A comprehensive erosion control plan
- Delineation of off-limit areas, including wetlands, prior to construction
- Best Management Practices
- Manual extraction of invasive vegetative species and rapid establishment of desirable vegetation and seeding, planting, and mulching of exposed and disturbed soils
- Use of mylar tape, snow fencing, 4-7 ft. tree plantings and the seeding of upland grassland areas with a cool season grass to deter waterfowl activity in the off-site wetland mitigation area
- On-site wetland mitigation system designed to provide seasonal aquatic habitat for fish, waterfowl and amphibians; habitat for multiple types of wetland plant species; and passerine bird nesting, feeding and resting habitat
- Monitoring of the deer population and implementation of approved methods of reducing deer/vehicle accidents in accordance with the Deer-Vehicle Accident Management Plan

7 Town of Tonawanda Comments

Comment: As the Town of Tonawanda Supervisor, I have heard from a number of constituents who may be directly affected by the expansion of the Metro Rail line from UB's South Campus down the middle of Niagara Falls Boulevard. Although the project may have many economic and environmental benefits when completed, it also comes with some direct impacts to residents and businesses along the preferred route.

Our primary concern is the impact that the Light Rail Extension will have on the immediate area bordering Niagara Falls Blvd. The project calls for the use of eminent domain on at least 4-5 properties on the Tonawanda side and another 4-5 properties on the Amherst side. We have spoken to the elected officials in Amherst on this issue as well and they will also be voicing their concerns to the NFTA.

As someone who is very familiar with eminent domain practice and the impact it can have on a business this is cause for alarm for both Towns. To start, everyone must realize that loss of business is noncompensatory under NYS Real Property Law. Then there's the potential relocation of these businesses to consider (relocation expenses are compensatory). If you own or have owned a small retail business, you realize that moving your business a half mile or a mile away is something you would never want to be told to do. The move could have a drastic impact on the bottom line of your business.

Response

The Proposed Action is being planned and designed in accordance with all local, state, and federal laws and regulations. These regulations, including the National Environmental Policy Act, set out specific criteria for environmental and social impacts and how they are to be avoided and/or mitigated against. Respective jurisdictional agencies have been and will continue to be consulted throughout the development of the project. The DEIS discusses the potential environmental effects that could be expected to occur with the construction and operation of each alternative.

The Proposed Action was developed to minimize impacts to private property. To reduce the residential and business displacements along Niagara Falls Boulevard and Maple Road, NFTA proposed the conversion of existing roadway lanes for transit use. Some displacements will be necessary, as shown in Chapter 4, Potential Property Acquisitions and Displacements of the DEIS. NFTA will coordinate with affected property owners and tenants to develop means to avoid or minimize property acquisitions and displacements. Potential Property Acquisitions and Displacements, property acquisition activities, including relocations, would be performed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) as amended and Federal

Transit Administration Circular 5010.1D, Grants Management Requirements and all applicable New York State laws that establish the process through which NFTA may acquire real property through a negotiated purchase or through condemnation.

Comment: There is also a noise concern that both Supervisor Kulpa and I have. The noise that will be caused by the proposed extension will, in our opinion, have an unfavorable impact on the neighboring residential neighborhoods. These are neighborhoods in both of our communities that can use all the help they can get, and the increased noise will only add to their present situation.

Response

The NFTA performed a noise analysis following procedures described in the Federal Transit Administration (FTA's) Transit Noise and Vibration Impact Assessment (FTA Report No. 0123, September 2018) (FTA Guidance Manual). The guidance prescribes a method for predicting project sound levels based upon the frequency of trains, the distance from a train, and the speed of the train.

Extensive noise impact analysis and monitoring have been performed and will continue to be analyzed as the project moves forward. Potential noise impacts from LRT line, stations, storage/light maintenance facility operations, and at-grade crossings were considered as part of the noise analyses performed. The Proposed Action was designed with consideration of the potential for noise impacts. Where potential adverse noise impacts were identified, noise mitigation measures were identified. Noise mitigation measures included as part of the Proposed Action as design changes include implementation of rail skirts on the full fleet of rail vehicles that shield the vehicle wheels on the rails from adjacent receptors and signaling devices limited to 83 dBA at 50 feet. Wayside noise barriers, removal of at-grade crossings, and an alternate track alignment utilizing the southbound lanes of the John James Audubon Parkway were considered and were found to either not be feasible or not provide additional benefit.

Additional potential noise sources include the PA systems used to announce the arrival of the Metro Rail vehicles, wheel squeal, and the hum associated with the Traction Power Substation (TPSS). The PA system will have volume adjustment controls designed to maintain announcement volume at the specified noise level, as appropriate. With proper use, short-term noise from the PA system announcements is not expected to be a noise annoyance to sensitive receptors adjacent to stations. Regular maintenance of the wheels and brake pads would minimize the noise generated by wheel squeal. The TPSS will be designed in accordance with the NFTA design criteria intended to minimize the noise from transformer hum.

NFTA is committed to abiding by local noise ordinances, whenever feasible and reasonable. Possible noise minimization measures during construction include the following:

- Conducting construction activities during the daytime hours

- Routing construction equipment and other vehicles carrying spoil, concrete, or other materials, where feasible, over designated truck routes that would minimize disturbance to residents
- Locating stationary equipment away from residential areas to the extent feasible within the site/staging area
- Employing control technologies to limit excessive noise when working near residences
- Adequately notifying the public of construction operations and schedules

Comment: Lastly, I have a concern about the impact on residential property values along Niagara Falls Boulevard. Residents will only be allowed to leave their driveways and head south on the Boulevard. Would you want that? I wouldn't! Again, I believe this will have another negative impact on property values.

The project, as I have told the NFTA previously, benefits Amherst and UB, yet they are asking the residents and businesses of the Town of Tonawanda to pay a steep price for this project. When this whole process started, I told them that due to the fact I just mentioned they should take the extension up Millersport Highway. I was told that the retail property owners along the Boulevard would benefit greatly from it remaining on the Boulevard. I told them that I agree the retail properties would benefit...on the Amherst side, not the Tonawanda side because all of the Big Box development is on the Amherst side.

Response

Pedestrian and vehicular access to residential properties along the Proposed Action alignment would be minimally affected by the Proposed Action operations. Vehicles turning left on Niagara Falls Boulevard may have to drive an additional distance to the nearest signalized intersection and make a U-turn. Residences would experience positive impacts from increased access to transit and transportation options provided by the Proposed Action. The extension of the Metro Rail would provide increased access to community facilities and businesses along the Proposed Action corridor.

A substantial body of literature has shown that transit-adjacent locations have higher residential property values as compared to areas with similar characteristics located further from transit stations. Commercial properties, particularly office buildings, also experience a transit value premium. These benefits would be realized along the existing Metro Rail corridor, as well as the Proposed Action alignment in both Amherst and Tonawanda.

8 Public/Agency Comments

NFTA - RECORD #763 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name : Amanda
Last Name : Acker
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

I live in the Audubon community of Walton Woods, which will be directly impacted by this project. Our neighborhood backs up to the JJ Audubon Pkwy on the side the metro rail is proposed to run up to the 990 entrance. The maintenance shed which is being proposed will also be backed up to our neighborhood. Many in our community feel very strongly that this metro rail being directly in our backyards will have a very negative effect on our quiet peaceful community. There are many young families that live in our neighborhood, with small children and we are concerned about many issues which have not been properly addressed such as crime impacts, noise impacts with the proposed metro rail running late into the evening hours, property value impacts, the impact of running a metro train back and forth along side our neighborhood causing constant vibrations and how this may affect homes with existing soil and sinking foundation issues (which is a known problem in our neighborhood and this area of Amherst.) it has been very disappointing that we have not been given a voice and that our concerns have gone unheard and we have not been given representation through our town appointees. For many of us the negative financial impacts that this project could bring to our homes is quite daunting.

Submission Method : Website

From: deborah ackerman [REDACTED]
Sent: Wednesday, February 12, 2020 3:22 PM
To: railx
Subject: comment metro rail expansion project

I am for the metro rail expansion plan which follows N.F.Blvd. I suggest tunneling a little further as there is more room to surface past Kenmore Avenue as the street is already a little wider. Another comment was going down Millersport which does seem to me more direct to UB North Campus. Either would be a nice improvement especially the NF Blvd span which would most likely improve that area starting at Kenmore Avenue, this might spark investors to be interested in improvements to that area which is not as nice as it used to be!

--

Thank you ,
Deb Ackerman

Comments

Please provide your comments on the Draft Environmental Impact Statement.

I recognize the planning efforts of the NFTA and the hard working NFTA representatives charged with the task of presenting the plan to an unreceptive audience of residents. I reside in the Audubon Community literally hundreds of feet from the proposed light rail line. We have been told that we will not be much impacted by noise created by the train. How can this be? Where is the data to support this claim? Common sense tells us that there will be more noise if a train runs within a few hundred feet of our house. Noise that will continue every day until 2 AM. We are told that vibration is not a significant factor. The Audubon community was built on a faulty soil substructure. A number of residents have endured the cost of a sinking foundation. One house, 250 feet away from our residence endured the \$45,000 cost of foundation work to stabilize the structure. The residents never recovered this cost when they sold their home.

Comment Submission Deadline: 4:00pm on March 24, 2020

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: Frank Alabiso

Address: [REDACTED]
Amherst, NY 14228

Email: [REDACTED]

Phone No: [REDACTED]

Affiliation (if applicable):
(Audubon Resident)

Have more to say?

Email us at railx@nfta.com



(2)

Comments

Please provide your comments on the Draft Environmental Impact Statement.

two years later - \$45,000 that would have been used to support their retirement. How can we believe that the vibration from light rail will not exacerbate this problem?

We have been told that our property value will increase as a result of light rail. How is this possible with a train that runs until 2 AM in our "backyard?" No doubt that 20, 30, 40 years from now Amherst and Lockport will be a sprawling suburb. We will probably need light rail then but do we need it now? Why do we need light rail on Audubon Pky. when light rail will reduce 4 lanes to two? We will still have the 990 traffic exiting onto and off of Audubon Pky but with 2 fewer lanes. why wouldn't the light rail line be routed down millersport Hwy which is a direct line to Lockport and has plenty of room available for right of way while keeping it a 4 lane highway that intersects the 990?

None of these concerns have been adequately addressed. Meanwhile the Sweet Home station is already being constructed.

Comment Submission Deadline: 4:00pm on March 24, 2020

Thank you,
Frank Alahisa, 3/16/20

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: Frank Alahisa

Address: [redacted] Amherst NY, 14225

Email: [redacted]

Phone N [redacted]

Affiliation (if applicable): (Audubon Resident)

Have more to say?

Email us at railx@nfta.com



MR. ALAVISO: Yes. My name is Frank Alaviso, A-L-A-V-I-S-O. I live in the Audubon community. I live -- my home backs up to the Audubon Parkway. There is not a lot to say about this proposal. How could anybody possibly believe that there is not going to be enough vibration to affect our homes. How can anybody possibly believe that there isn't going to be enough noise pollution to affect our homes.

One speaker brought up the issue of the problem in the Audubon community. Many people who bought homes in the Audubon community bought them believing that their homes were being built on solid ground only to find out that their homes are sinking. What will the vibration do to those homes that are now sinking?

We have a neighbor that seven years ago paid \$45,000 to shore up their foundation and that was money lost when they turned around to sell their house. So it doesn't seem to make sense.

There is not a lot to say because if you listen with your ears and you look with your eyes and you think about the residents of Audubon, how can you be convinced that this is a good thing. There was a wise man that once said don't pee down my neck and tell me it's raining.

NFTA - RECORD #741 DETAIL

Status : Unread
Record Date : 2/9/2020
Submission Date : 2/9/2020
First Name : Gabriel
Last Name : Antos
Agency/Affiliation/Business :
State : NY
Zip Code : 14218
Submission Content/Notes :

Please expand the metro rail into the southtowns,including into lackawanna and possibly blasedell. there are good,hardworking people who live in lackawanna and blasedell when have little to no access to public transportation home when they get off work downtown late at night. everyone should be able to reach their home within a short distance later than just 10pm some nights,not just those who live downtown. Please considering expanding the southtown routes such as the 14 and 42 to run later or extend further if unable to expand the metro rail south

Submission Method : Website

NFTA - RECORD #733 DETAIL

Status : Unread
Record Date : 1/23/2020
Submission Date : 1/23/2020
First Name :
Last Name : Arlotta
Agency/Affiliation/Business :
State : NY
Zip Code : 14127
Submission Content/Notes :

Obviously not everyone will be happy.

If I were the NFTA and the current governor...YOU CAN GO S REW YOURSELVES'...LIKE I'VE BEEN FORCED TO FOR OVER THIRTY YEARS!

LET'S NOT FORGET HOW YOUR "of counsel" WAYNE GRADYL...HE HAS A PROBLEM WITH ANSWERING PROPERLY SEVERED LEGAL DOCUMENTS...YOU CAN ALL GO SHOVE IT WITH YOUR [REDACTED] NUN AND CHIEF JUSTICE ROBERTS UP EVERY HOLE WHERE THE SUN DON'T SHINE...

Submission Method : Website



Niagara Frontier Transportation Authority
181 Ellicott Street
Buffalo, NY 14203

March 24, 2020

To Whom It May Concern:

Transit Oriented Development (TOD) holds tremendous promise in WNY to connect thousands of residents with work and educational opportunities, services and amenities in a way that protects both public health and the environment. While time limitations prevent a more thorough comment submission, Local Initiatives Support Corporation (LISC) is grateful for the opportunity to highlight the following issues for your consideration as the process unfolds.

- 1) To reach its full potential, the light rail expansion must be equitable – ensuring that the positive outcomes of residential and commercial development surrounding transit stations, including reduced transportation costs, increased access to jobs and community amenities, and improved environmental quality, especially benefit low-income and minority residents. Constructing and preserving affordable housing along new transit corridors ensures equity from TOD.
- 2) While the expansion of the system will result in direct, physical impacts such as noise, etc. on the host communities, the ridership and economic impacts will be felt along the entire system.
- 3) For several miles, the light rail corridor in Buffalo serves as a sharp dividing line between black and white, poor and secure, chronic disease and wellness.
- 4) Long-standing structural and institutional racism and disinvestment have left many of the neighborhoods along the existing light rail line within the corridor at a strong disadvantage when compared to the white, predominantly affluent neighborhoods along the northern portion of the rail corridor.

Local Initiatives Support Corporation

70 West Chippewa St., Suite 604, Buffalo, NY 14202 • T 716.852.3430 • lisc.org/wny

- 5) Land speculation along the corridor and increasing property values have the strong potential to displace many residents, small businesses and/or the social service providers that have located along the corridor for many years.
- 6) Clear strategies are needed to:
 - a. prevent displacement of low income renters, MWBE, small businesses, and social service providers within ¼ mile of the corridor along the existing line and proposed extension;
 - b. preserve and increase affordable housing within ¼ mile of the line throughout the entire corridor;
 - c. actively engage MWBE firms and local neighborhood businesses in the light rail expansion project design, construction and operation process. The recent work at the Northland Workforce Training Center provides an excellent model for engaging local, minority businesses throughout the process; and
 - d. actively engage residents, neighborhoods and community based organizations along the existing light rail line and proposed extension in the decision making process for the light rail corridor and disposition of public real estate within ¼ mile of the transit stations.

LISC has worked on several equitable transit oriented efforts throughout the nation. We look forward to collaborating with the neighborhoods and residents along the light rail line as well as the development team to optimize the benefits of this important investment for our full community.

Sincerely,

/ s /

Julie M. Barrett O'Neill, Esq.
Executive Director

From: ANN BARTON [REDACTED]
Sent: Tuesday, February 25, 2020 8:37 PM
To: railx
Subject: Metro Rail Expansion

To Whom It May Concern,

I just attended your public hearing on the expansion of the Metro Rail into Amherst held at the Sweet Home Middle School. I was pleased to see be that the majority of people that took the time to speak feel, as do I, that the expansion is unwanted by the actual residents . I was also pleased to hear people who understand where the data presented in flawed in many ways. , Niagara Falls Blvd, Alberta and North Bailey Road to accessing shopping at Wegmans ,Tops and Walmart.

My personal concerns involve the reality that safety concerns have not been addressed. As we have seen on Niagara Falls Blvd pedestrians do not know how to cross busy roads safely. They do not use crosswalks or crossing signals properly. this will lead to an increase in pedestrian injury everywhere along the expansion route. Even people using this expansion will face increased safety in having to cross Maple Road

The existing traffic will make it difficult to navigate the roads shared by the rail. Despite what your information says , the existing traffic will remain. Even your information indicates the expansion will not meet the needs of the current auto drivers in this area as most of them are local drivers. These drivers will not benefit from park and rides for their needs. People from this area would have increased travel time and not be convenience in using this system. The traffic at high volume times already backs up from Niagara Falls Blvd to Flint road heading west. Traffic backs up from Sweethome Road To Eggert road heading east.

The impact on my personal property is of greatest concern right now. I live on Homecrest Drive directly behind Boston Market On Maple Road. I will be exposed to increased noise for several hours of the day. I had foundation work done on my basement walls a few years ago . The construction vibrations may cause this work to fail. Also despite what your study says my property value will be negatively affected. I was recently told by a realtor I should sell now to avoid a loss in value. I love my home but I feel I may have to do this to save my investment.

It seems this expansion is a waste of money as there is no proof of increased ridership. Your studies indicate most of the riders will be UB students and they would have their fares paid by UB. Universities across the country are losing enrollment and expect this trend to continue in years to follow. There is no proof new riders other than students will be using this expansion. In fact it doesn't make sense to use it due to it causing an increase in travel time for most people. I feel my tax money would be wasted and I resent having my money to benefit for non residents benefit with no reward to the actual residents. The current buses work well there is no need to change.

Lastly I do not believe the studies and other information presented is based in fact. I believe this is UB bullying residents to accepting paying more of their earnings to benefit people who have little ties to the community other than their attendance at school. These are not the people who will pay for the system or live with the mess it makes'

Please consider residents feelings over the the temporary residents. Remember once the rails come they will never go away. We will have to live with the consequences forever.

Ann Barton

From: Darlene Bartus [REDACTED]
Sent: Thursday, February 27, 2020 7:49 AM
To: railx
Subject: Expansion

Hello! It is nice to hear that you are expanding the metro rail in the Northtowns it would be nice to see you expand in the Southtowns as well. It seems like the Southtowns is the forgotten area for bus and rail service. You are making more changes to the 16 to accommodate the medical campus. The changes that you made a couple of years ago to stop running down Electric Avenue was not the best decision. You have elderly having to walk to South Park especially in bad weather conditions is not the best idea for safety reasons all the riders live off Electric Avenue. As you know living in these areas especially Lackawanna, Blasdell area we tend to have more in the snow belt area. Please consider making the change back to how they used to run. It is not going to impact and have big delays in doing that.

Thank you!

MR. BECKER: My name is Bruce Becker. Last name, B-E-C-K-E-R. I'm the immediate past president of the Empire State Passengers Association. The Empire State Passengers Association is a state-wide citizens advocacy organization supporting new and enhanced public transportation and passenger rail service across the state.

ESPA, as we are known, applauds the NFTA's efforts to advance the environmental impact review process to the current draft status. We fully support the proposed action to expand the current NFTA light rail line north to Amherst to the U.B. campus and to the 990 as being proposed. I'm a resident of East Amherst.

This is -- we all have an opportunity to speak. You can all speak too if you wish.

The future of Buffalo and many urban areas is improved public transportation. There are many success stories across the country of cities that instituted light rail lines after Buffalo started its route back in the '80s that have had tremendous success with their light rail, have generated new ridership that was not envisioned at that time.

These cities have enjoyed robust transitory development which has resulted in vastly improved and enhanced property values along the route and resulting tax increases, the resulting increase in tax collections, but most importantly, these cities have seen significant employment and population growth, something that we all recognize is important to our area.

Young folks have been the major beneficiaries of many of these expansions and employment opportunities. It is widely shown that young people, young adults, are forgoing private vehicle ownership and are dependent on efficient modern transportation systems like the proposed line being proposed by the NFTA.

Let's get Buffalo into the future. We applaud the NFTA and we want to endorse this proposal. Thank you.

NFTA - RECORD #780 DETAIL

Status : Unread
Record Date : 2/20/2020
Submission Date : 2/20/2020
First Name : Robert
Last Name : Bennett
Agency/Affiliation/Business :
State : NY
Zip Code : 14217
Submission Content/Notes :

Firstly, I'm happy to see that Buffalo's public transport is moving forward, both for the economy and the environment. I do have a few questions:

1. How long is it estimated that this should take to build? And is there a way to incentivize/ensure construction to complete this on time? Such as penalizing company if nit done on time
2. I'm wondering if the implementation of the expansion project will result in changing of bus routes and how that will be decided upon. I'm sure some routes will be less traveled with the expansion
3. What is the total time estimated from one end to the other of the rail (Amherst to Buffalo)

Overall I am cautiously excited about this expansion and hope that it does not affect traffic considerably (see question #1).

Submission Method : Website

From: Linda Biedron [REDACTED]
Sent: Wednesday, February 19, 2020 2:37 PM
To: railx
Subject: Metro Rail Expansion Project

We received notice of the MR Expansion Project and would like to voice that we are strongly against this. This project will have a huge negative impact on our area not only to mention the uproar the construction will cause our already congested area but more importantly it will without doubt create an increase in crime. There is no reason to expand the metro rail to our area. There is the bus lines available to all areas within our Towns. We do not want or need this expansion project and do not need any increase in crime!! Find another way to spend the money for this project, I'm sure there are much better uses for it.
Sent from my iPhone

NFTA - RECORD #742 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Melissa
Last Name : Boes
Agency/Affiliation/Business :
State : NY
Zip Code : 14094

Submission Content/Notes :

Fully support this initiative. Hope the vision becomes a reality!

Submission Method : Website

Rachel Maloney

From: Justin Booth [REDACTED]
Sent: Thursday, March 12, 2020 3:37 PM
To: railx
Subject: NFTA Metro Rail Expansion DEIS Comment

Categories: Blue Category

To Whom it May Concern:

GObike Buffalo appreciates the promotion and advancement of a robust and highly functional transit system and we support the NFTA's efforts to extend Light Rail Transit service northward from UB south campus to UB north campus. We appreciate the potential economic opportunity this expansion could bring to the region however we wish to comment on the DEIS as follows:

- 1.
2. The project
3. Goals & Objectives stated in Table S-1 do not explicitly state that overall total Vehicle Miles Traveled (VMT) are reduced by the LRT. This should be a paramount goal to reduce Single Occupancy Vehicle (SOV) trips which are known to decrease safety, land use
4. and transportation efficiencies.
- 5.
- 6.
7. Table S-3.
8. Proposed Action Traffic Capacity Change only includes recommendations benefiting SOV's. There is no recommendation to replace traffic signalization with state of the art, high resolution detection and control. Bicycle lanes are omitted from the table and must
9. be considered for traffic capacity change. Lane width reductions should be included to support safer speed operations.
- 10.
- 11.
12. S.4.6 Substations
13. should include Mobility Hubs for successful transportation mode change and continuity
- 14.
- 15.
16. Table S-4 Environmental
17. Impacts Summary must be more stringent regarding ROW acquisitions for road widening. Widening should not be warranted if proper, best practice measures are taken at key intersections such as roundabouts and high resolution traffic signal control. Street widening
18. significantly impacts pedestrian safety and comfort and complicates bicycle navigation through the intersection. Level of Service impacts should be mitigated by proper intersection design and should be offset by reductions in VMT. It should be noted that LOS
19. does not consider pedestrian nor bicycle safety and comfort.
- 20.
- 21.
22. Chapter 13.

23. Transportation. The NACTO Transit Street Design Guide and NACTO Urban Bikeway Design Guide should be the predominant reference for any new facility. Table 13-12 Proposed Action: Traffic Capacity Change the Brighton/Maple/Niagara Falls Boulevard intersection
24. should be redesigned to accommodate dedicated bicycle facilities, the west bound right turn lane should be eliminated to improve pedestrian crossing. Protected bicycle lanes should be added to Niagara Falls Boulevard (Fig. 13-3 & 13-5), Maple Road and Sweethome
25. Road. Transit Boarding island widths could be reduced to 10' to minimize ROW impact and better accommodate protected cycle tracks. Sweet Home Road should be reduced from 4 lanes to three lanes (Fig 13-7). Bike lanes should be included on John James Audubon
26. Pkwy, Fig 13-9 and travel lanes reduced to 10 feet.
- 27.
- 28.
29. 13.5.3 Parking,
30. parking demand estimates for proposed park and ride should be reduced to and coordinated with existing parking facilities available to the public.
- 31.
- 32.
33. 13.5.4 Pedestrian
34. and Bicycle suggests only minimum improvements for bicycling (ie 5' wide bicycle lane) and pedestrian movement and should be elevated to preferred designed guidance (ie protected cycle track) to truly provide safety and comfort. Connectivity between campuses
35. must be included. This is essential for the projects success supporting first mile and last mile trips.
- 36.
- 37.
38. 21.1 Irreversible
39. and Irretrievable Commitment of Resources, NFTA should prepare to adapt expectations to consider a Bus Rapid Transit (BRT) solution in lieu of the current LRT recommendation in order to still satisfy mass transit objects in a significantly more cost effective
40. manner.
- 41.

Thank you

Justin Booth
Executive Director
GObike Buffalo

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.

Rcvd
2/19/2020

February 13, 2020

Mark J. Bosch
Carol A. Bosch
[Redacted]
Amherst, NY 14226

Metro Rail Expansion Project
Niagara Frontier Transit Authority
181 Ellicott Street
Buffalo NY 14203

Re: Draft Environmental Impact Statement (DEIS)

We are writing in regard to the proposed Metro Rail Expansion Project.

We have been living in Eggerstville at the above mentioned address for the last 27 years. We have enjoyed the peace and quiet of this family-oriented community. When we moved here, we enjoyed everything about our home and environment.

Our ultimate goal is to continue living this peaceful existence. The proposed expansion will undoubtedly throw a wrench into this plan.

Our backyard backs up to the current businesses on Eggert Road which have been very unobtrusive to our current way of life. Expanding rapid transit through our neighborhood will forever change this. Not only will the construction and noise and traffic changes be upsetting for years, the actual rapid transit location is ENTIRELY TOO CLOSE for comfort. Especially if the plan entails using Eggert Road for the expansion. Would you want this in YOUR backyard?

Not only is this project unwarranted and unnecessary, but it also would not serve the greater good. How many Amherst residents would leave their cars at home to take rapid transit? We are living in a TOWN, not a city. We all have driveways, most have garages, and almost everyone owns a vehicle or two. Why would we choose this transportation when we love our own vehicles?

As far as linking the 2 UB campuses, this is totally unnecessary. The blue UB buses transport the students everywhere constantly - day & night. This is totally sufficient for their transportation.

Any additional funds to rapid transit should go to upgrade and improve the existing system. Spend funds on improving the safety of the system. Security guards should patrol all the transit parking lots, the terminals and ride in the train cars to provide security and protection. Maybe if this is done the NFTA could be running more efficiently and not in the "red".

Sincerely,

Mark J. Bosch
Carol A. Bosch

Mark J. Bosch
Carol A. Bosch

NFTA - RECORD #791 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : Edward
Last Name : Bradfuhrer
Agency/Affiliation/Business :
State : NY
Zip Code : 14094
Submission Content/Notes :

The benefits of expanding the metro rail through Amherst would exceed the additional noise and traffic disruption that new infrastructure would cause to already noisy and high trafficked areas. When completed, I intend to use the park and ride at Audubon to decrease the amount of driving I do between home, the City of Buffalo, and Niagara Falls Boulevard.

Submission Method : Website

NFTA - RECORD #758 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name : Sean
Last Name : Brodfuehrer
Agency/Affiliation/Business :
State : NY
Zip Code : 14216
Submission Content/Notes :

I am in full support of this light rail extension project. The benefits of a reliable, resilient and sustainable transportation backbone for northern Erie County is crucial to our ability to meet numerous goals as a region. Connecting many of the regions education, government, service and employment centers along a single line will increase opportunities economic opportunities out of reach for many. This route will free time for those who can afford it least. It will provide a weather resilient and environmentally sustainable corridor which the whole region would benefit from in quality of life increases, reduced pollution, and the key is reliability.

Submission Method : Website

Comments

Please provide your comments on the Draft Environmental Impact Statement.

STILL VERY CONCERNED ABOUT TRAFFIC CONGESTION AT SWEET HOME AND MAPLE RD. INTERSECTION AND SURROUNDING STREETS. ALREADY VERY CONGESTED DURING RUSH HOURS + SCHOOL TIMES. REDUCING + CHANGING LANES ON SWEET HOME WILL CAUSE CONGESTION TO WORSEN. THE LANES WERE CHANGED TO CURRENT FORMAT A NUMBER OF YEARS AGO TO RELIEVE CONGESTION SEEMS LIKE THIS IS A STEP BACKWARDS. PLEASE COME SIT ON MY PORCH + WATCH THE TRAFFIC BACKUPS DURING RUSH HOURS. ESPECIALLY ON BAD WEATHER DAYS. ALSO VERY CONCERNED ABOUT HOW DIGGING A TUNNEL WILL AFFECT MY HOUSE + YARD. MY HOUSE IS ON STREET NEXT TO MAPLE RD. ALREADY HAVE MUCH NOISE FROM MAPLE. ALSO LAND IS LOW + YARDS VERY WET + WATER TAKES TIME TO DISSIPATE. CONCERNED ABOUT FLOODING FROM DISRUPTION OF LAND. LASTLY SAFETY IS A BIG CONCERN. MANY SCHOOL CHILDREN CROSS MAPLE ROAD FROM OUR NEIGHBORHOOD. WOULD LOVE TO HAVE AN DISCUSSION WITH YOU IF YOU

Comment Submission Deadline: 4:00pm on March 24, 2020
WOULD LIKE TO TALK - THANKS!!

BY THE WAY - I DO RIDE THE METRO + DID USE IT TO TRAVEL TO WORK DAILY FOR MANY YEARS

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: ANN BURMEIER

Address: [REDACTED]
AMHERST NY 14226

Email: [REDACTED]
[REDACTED]: [REDACTED]

Affiliation (if applicable): _____

Have more to say?

Email us at railx@nfta.com



ALSO - WOULD LIKE TO SEE A LIST OF RESIDENCES YOU PLAN TO PURCHASE.

NFTA - RECORD #750 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Mary
Last Name : Busch
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

I am a resident of the Audubon community, and a UB employee. My main route to/from campus each morning is John James Audubon Parkway. This development directly affects my daily route to/from work each day, as well as MOST of my daily driving (to/from 990, to/from Wegmans, shopping centers, etc). I prefer to have my car on campus, and need to transport young children - I would not use the light rail system and find it a large hinderance. (It would take me 10 minutes to even just walk down the road to the rail station (not counting wait time, ride time, and walk time to my building after all that), and it only takes 4 minutes to drive to my campus parking lot). I am NOT looking forward to extending my commute time to now wait for trains to pass on the road. Alternate routes to campus such as Millersport or Sweet Home Rd TRIPLE my commute time, so this truly is the only route I'd take.

The Audubon community prides itself on being a quiet, nature-focused community within Amherst with no fences and minimal barriers for sound. I have VERY sincere concerns for the amount of noise this rail system will create, especially with increased development at the 990 terminus. We already hear 990 traffic noise, and I really do not wish to hear squeaking wheels, train horns and more at all hours of the day/night.

I'm baffled why the train is proposed to go up this side of audubon to the 990. It is far more beneficial (and less disruptive) to extend the rail up Millersport to meet up with the Crosspoint area. Those residents/workers have ASKED for this to happen, and yet the rail still extends up the parkway. KEEP GREEN SPACE GREEN! Keep quiet neighborhoods quiet!

Submission Method : Website

NFTA - RECORD #799 DETAIL

Status : Unread
Record Date : 2/27/2020
Submission Date : 2/27/2020
First Name : Kristen
Last Name : Cacciotti
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

I am very concerned about the effects of this railway. We already have some major foundation issues on houses in the Audubon area. This will only exacerbate the problem. In addition, the noise levels will make our homes impossible to live in comfortably.

Submission Method : Website

NFTA - RECORD #812 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : Dan
Last Name : Cadzow
Agency/Affiliation/Business :
State : NY
Zip Code : 14214
Submission Content/Notes :

The City of Buffalo's revitalization is going great, but the streets are increasingly congested. We need this project and more to make transit a viable option. In addition, locating UB's campus in Amherst was one of the biggest mistakes in the city's history. This light rail line will help to remediate some of the damages caused by that decision.

Submission Method : Website

NFTA - RECORD #773 DETAIL

Status : Unread
Record Date : 2/13/2020
Submission Date : 2/13/2020
First Name : John
Last Name : Canna
Agency/Affiliation/Business :
State : NY
Zip Code : 14068
Submission Content/Notes :

Who is paying for this. Not the local taxpayers I hope.

Submission Method : Website

NFTA - RECORD #772 DETAIL

Status : Unread
Record Date : 2/13/2020
Submission Date : 2/13/2020
First Name : John
Last Name : Canna
Agency/Affiliation/Business :
State : NY
Zip Code : 14068
Submission Content/Notes :

Last time nft did anything on my street they added full size buses to the traffic. Rarely do they have more than 2 or 3 people in them. We are still stuck with the noise, pollution, and loss of property value. My vote is NO !

Submission Method : Website

NFTA - RECORD #767 DETAIL

Status : Unread
Record Date : 2/13/2020
Submission Date : 2/13/2020
First Name : Karlen
Last Name : Chase
Agency/Affiliation/Business :
State : NY
Zip Code : 14214
Submission Content/Notes :

Please extend metro rail from South to North Campus. I would stop using my car to get to work.

Submission Method : Website

NFTA - RECORD #761 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name : Jennifer
Last Name : Chazen
Agency/Affiliation/Business :
State : NY
Zip Code : 14260
Submission Content/Notes :

I support the extension of Buffalo's light rail transit system to UB's north campus and eager to see it completed! This will enormously reduce greenhouse gases, and result in shorter commute times and less noise. With UB being such a huge economic driver in Buffalo, all campuses need to be more easily accessible, and this would be a great step.

Submission Method : Website

NFTA - RECORD #825 DETAIL

Status : Pending
Record Date : 3/25/2020
Submission Date : 3/25/2020
First Name : Janice
Last Name : Cochran
Agency/Affiliation/Business :
State : NY
Zip Code : 14260
Submission Method : Website
Submission Content/Notes :

Hello,

I was unable to attend the Public Hearing scheduled for 2/25/20 from 5 to 9pm at the Sweethome Middle School. I was at work and arrived shortly after 7pm, yet everyone had left. This does not honor the time that was printed in the postcard.

My friend got there some time after 5:30pm and said the following:

How is it acceptable that 68 properties can be taken (eminent domain?) for this project?

Noise decibels are estimated to change from 70 to 71 - this is hard to imagine.

Property values will increase. How was this determined? We are not San Francisco.

The speaker was very bureaucratic, he presented and then left.

I was very sad to hear of her experience, as it further stirs distrust of the NFTA and the project. A speaker who does not stay around for questions gives a closed and dictatorial impression. There is no excuse for rude behavior from the public, yet a more respectful presentation can go a long way in calming antagonism for the NFTA and this project.

NFTA - RECORD #822 DETAIL

Status : Unread
Record Date : 3/21/2020
Submission Date : 3/21/2020
First Name :
Last Name : Colbert
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

My family and I have lived in the Audubon Community for nearly 30 years. My husband and I bought our first small house here, and we fell in love with the neighborhood. After the birth of our two children, we delayed the purchase of our second home because we wanted to stay in the Audubon. So, we waited until larger home became available within the Audubon Community. Why did we do this? Well, it wasn't because there was a railway nearby! It was, and it is because this neighborhood affords a quality of life that is unmatched in Western NY. It is a quiet setting surrounded by nature, and is somewhat off the beaten path. I once saw an Canadian Eastern wolf in our back yard.

Why would anyone want to spoil this unique setting in WNY, with a noisy rail system? Enough said.

Submission Method : Website

From: Vanessa Colbran [REDACTED]
Sent: Tuesday, March 3, 2020 5:04 PM
To: [REDACTED]
Cc: railx
Subject: Metro Rail Expansion Project - Boston Market 4185 Maple Road, Amherst, NY (RI 2356)

Dear Mr. Ulatowski,

Our office has been made aware of the upcoming Metro Rail Expansion Project in proximity to the property located at 4185 Maple Road Amherst, NY., occupied by the Boston Market (our tenant). As a remote landowner, we are not able to attend upcoming public meetings explaining the work schedule.

We understand that the improvements needed along Maple Road may impact our property. At this time are there plans available which show the proposed impacts to our property? Will any right of way be required from the site, and if so what is the timing for the acquisition?

Any additional information you may have with respect to the project will be appreciated.

I look forward to your response.

Thank you,

Vanessa Colbran
Associate Manager, Right of Way, Condemnations, & Real Estate
Realty Income Corporation (NYSE "O")

[REDACTED]

From: Mary Comtois [REDACTED]
Sent: Tuesday, March 3, 2020 12:54 PM
To: railx
Subject: Comments on Rail Expansion

It's about time for rail service extension through the Tonawanda/Amherst community. I would like to see significant funding for advertising to this community on potential savings of using rail service and programs to support employees such as a guaranteed ride home.

Also, when will the southtowns expansion take place?

3/1/2020

Comments

Please provide your comments on the Draft Environmental Impact Statement.

① "The identification of affected properties is based on the current level of conceptual engineering plans" as stated on 4th of the Potential Property Acquisitions and Displacements. Also stated, "Property Acquisitions will be further refined during preliminary and final design. My comment - or my question - is, this is no longer a proposal? This will be done in spite of many misgivings heard at the Feb. 25th meeting?"

② I am uncomfortable with the numerous phrases: could require, could displace, could potentially, could result, primarily, and further refinement (will occur) as the Proposed Action (moves) into preliminary and final design. The adverbs leave tons of "wiggle room" while the (Verbs) state finality?!

③ Mitigation (4.5) Can you reasonably eliminate one travel lane in each direction along Niagara Falls Blvd, as well as at the same time reducing lane width to 11 feet??
Additional mitigation measures MAY BE identified as project development progresses. Do you mean WILL BE?

④ Please comment to me, as my questions and concerns could not be addressed at Feb. 25th meeting... not a Q+A.

Comment Submission Deadline: 4:00pm on March 24, 2020

Thank You!

Gail Cross

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: Gary Ranney
Address: Buffalo, NY 14223

Gail Cross
Email:
Phone Number:

Affiliation (if applicable):
Resident and Co-owners

Have more to say?

Email us at railx@nfta.com



**Your feedback
is important!**

Please use this comment card to provide input on the Draft Environmental Impact Statement (DEIS) for the Metro Rail Expansion.

You may complete this comment sheet and drop it in the comment box, or you can mail it in.

For more information about the project, visit our website:
NFTAMetroRailExpansion.com



NOV 14 2012
Buffalo, NY

012

Niagara Frontier Transportation Authority
181 Ellicott Street
Buffalo, NY 14203



14203-229855

Metro Rail Expansion



NFTAMetroRailExpansion.com



Comment Card

3/1/2020

Comments

Please provide your comments on the Draft Environmental Impact Statement.

- ① Our parents bought [redacted] in May, 1956. Eventually the house became ours, and my brother has always lived there.
 - ② The current "proposed" design is shown to incorporate the present width of the street - HOWEVER - I have seen renderings showing 2 lanes N/S, 1 lane N/S, narrowed lanes to 11 feet, and additional bike lanes. Given this information, we likely stand to lose frontage. When will this be made known to us? How much will we lose?
 - ③ Gary's driveway is directly across the Blvd. from where Longmeadow ends at the Blvd. How many lanes there? Will there be any traffic device as there is now? How can he expect to enter/exit his driveway?
 - ④ There will be great amounts of mess, noise, vibration during construction - and continual added noise and vibration from the trains - in addition to the usual speeding traffic on the Blvd. Along with the property loss (which puts residential homes all the closer to the Blvd and train tracks,) please explain how this could possibly increase our property value? As stated at previous meetings, property values stand to increase!!
 - ⑤ Since the Feb. 25th meeting was not a Q+A, please answer these now.
- Comment Submission Deadline: 4:00pm on March 24, 2020**

Thank You!
Gail Cross

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: Gary Ranney

Address: [redacted]

Gail Cross

Email: [redacted]

Phone Number: _____

Affiliation (if applicable): _____

Residential owners since 1956

Have more to say?

Email us at railx@nfta.com



**Your feedback
is important!**

Please use this comment card to provide input on the Draft Environmental Impact Statement (DEIS) for the Metro Rail Expansion.

You may complete this comment sheet and drop it in the comment box, or you can mail it in.

For more information about the project, visit our website:
NFTAMetroRailExpansion.com



BUFFALO NY 14203
02 MAR 2008 PM 5 L

Niagara Frontier Transportation Authority
181 Ellicott Street
Buffalo, NY 14203

14203-229899

Metro Rail Expansion



NFTAMetroRailExpansion.com



Comment Card

NFTA - RECORD #798 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : Denise
Last Name : D
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

Don't want it here!! Period! Every metro rail station in this city is a breeding ground for illegal activities!! My son goes to Sweet Home Middle School and I don't want that Metro Rail to nowhere here or near his school. Period. Watch our home values decrease because it will turn this town into the Ghetto. We moved OUT of the city of Buffalo for a reason I will move right out of here and rent somewhere if I have to because of this disastrous idea. NO THANK YOU!!!

Submission Method : Website

NFTA - RECORD #820 DETAIL

Status : Unread
Record Date : 3/17/2020
Submission Date : 3/17/2020
First Name : Michael
Last Name : DeMars
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

As a resident and homeowner on Niagara Falls Blvd in the Town of Tonawanda I would like to comment on the proposed expansion of the rail system on Niagara Falls Blvd. Being on the front-line of this project, I feel my comments should have more influence than others. This proposed project is nothing more than a grab by wealthy interests looking to benefit at the expense of the community. Big development wants the land owned by private individuals for future commercial development. WNY with it's declining population, mass transit that is underutilized is not an honest straight forward proposition. Your inflated "projected" ridership figures are whimsical. Our country thrives upon the individualism that private transportation offers, particularly in the more affluent suburban area of your proposed expansion. The decline in sales from brick and mortar establishments is clear in the economic numbers that are widely available. I am deeply offended that there is no opportunity to publicly address the community against your project nor to have the communities negative views transparently addressed, the fallacy of the true intent the drives this proposed project and the true beneficiaries of this project and beneficiaries of future development. This project will facilitate more suburban sprawl, development of more commercial building that offers inferior jobs, wages and benefits to the majority of the public while a few influential developers fill there pockets with the profits of this ill proposed development. My particular location make me think that this project makes my property particularly well situated, and I will fight for fair market compensation for implementation of any land acquisition you plan to make of my property.

Submission Method : Website

NFTA - RECORD #768 DETAIL

Status : Unread
Record Date : 2/13/2020
Submission Date : 2/13/2020
First Name : Michael
Last Name : DeMars
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

This project is an abomination from any practical planning perspective. The study does not address the impact of trains in close proximity to traditional wood framed homes and damage from vibration to these structures. There is nowhere in the country that trains are in such close proximity to wood framed structures. Your initial plan stated there was "plenty of room on NFB for this project despite my observations. now I see there was not and now I see your plan to take more of my property to implement this project. This project is clearly a ploy to remove residents from NFB for future commercial development. The clear and sensible route for this project is down Millersport Hwy. But that is already commercially developed so it is not being considered. Your lack to hold public meetings, with public comment is abusive and anything but transparent. Submission of comment is meant to distract and reduce the public outcry against this project.

Submission Method : Website

MR. DIMINO: Thank you. My name is Mark Dimino. The last name is D-I-M-I-N-O. I am here representing the Amherst Peanut Line. Who are we? We're a group of people trying to get the Peanut Line, a former rail line, paved. It's now unpaved. The Peanut Line goes from Dodge Road to Transit Road.

The reason I am here for this meeting is that the expansion at Dodge Road goes over the Peanut Line track.

I'm not sure if the NFTA knew this, but talking to the consultants and a few members of the NFTA, they did. Also, it will be a benefit, the rail expansion, that cyclists will take the Metro Rail expansion out to the Audubon area and then go from Dodge Road out to Transit or past.

Once the Peanut Line is completed, you can ride, if you're a cyclist, you can go from downtown Buffalo all the way out to Akron, New York with a safe way of doing it. Thank you.

If anyone is interested in learning more about the Peanut Line, you can go to our Facebook page. Thank you.

NFTA - RECORD #744 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Catherine
Last Name : Donnelly
Agency/Affiliation/Business :
State : NY
Zip Code : 14221
Submission Content/Notes :

I am very supportive of this idea and love the change from Millersport to Niagara Falls Boulevard. I think that improves access to many existing businesses as opposed to running through a neighborhood. Am very happy to see this plan. I support this fully.

Submission Method : Website

From: Chris Dressel [REDACTED]
Sent: Sunday, February 16, 2020 9:10 AM
To: railx
Subject: Rail expansion

Good morning,

As a life long Buffalo resident and UB alumni, I am writing to voice my complete support for the metro rail expansion. This project is long overdue and will dramatically help bring thousands of suburban residents into the city with ease.

College kids are some of the most curious in any town, and ease of access to entertainment is often only second to cost for reasons why they do not venture into the higher culture areas of a city. This project would change that significantly!

Count me in for any rail expansion!

Sincerely,

Chris Dressel

NFTA - RECORD #778 DETAIL

Status : Unread
Record Date : 2/19/2020
Submission Date : 2/19/2020
First Name : Michael
Last Name : Dwyer
Agency/Affiliation/Business :
State : NY
Zip Code : 14226
Submission Content/Notes :

As a faculty member of the University at Buffalo, I am strongly in support of expansion of the rail line. The University at Buffalo is a major growth stimulator for Buffalo, but transport between campuses remains a constant problem for students. As a major city, we should be investing in more serious transportation infrastructure.

Submission Method : Website

NFTA - RECORD #807 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : Karen
Last Name : Enderle
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

I would prefer that the rail system stop at UB North and NOT travel down JJ Audubon Pkwy. For 19 hours a day the rail would be operating in the backyards of many Audubon residents and surely disrupting their quality of life. Please consider this fact in your future plans.

Submission Method : Website

NFTA - RECORD #811 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : Stephen
Last Name : Fabbiano
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

It's long overdue by not connecting the north and south campuses. This will be a plus for the students, employees and the public. I live on [REDACTED] and routinely take the train to sabre games. Being in walking distance to the eggert road station I will take advantage of the rail system, plus with the reconfiguration of the northtown plaza and eventually the boulevard mall will create additional riders. Good luck with the project.

Submission Method : Website

NFTA - RECORD #818 DETAIL

Status : Unread
Record Date : 3/11/2020
Submission Date : 3/11/2020
First Name : Doreths
Last Name : Fanning
Agency/Affiliation/Business :
State : NY
Zip Code : 14215
Submission Content/Notes :

Metro rail should go to the Flint Loop at UB North Campus, but the 44 Lockport bus should also go to the Flint Loop at UB North Campus thus allowing elderly, handicap and the disabled access to school, shopping and work in Amherst and Lockport New York.

Submission Method : Website

NFTA - RECORD #753 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Katie
Last Name : Fassbinder
Agency/Affiliation/Business :
State : NY
Zip Code : 14260
Submission Content/Notes :

The benefits for the communities (even the affected) far far outweigh the costs. I hope this goes through!

Submission Method : Website

Comments

Please provide your comments on the Draft Environmental Impact Statement.

I live at [REDACTED], most of the houses on the Tonawanda side do not have driveways with turnarounds, so you are forced to back in or out of your driveway. With the subway going down the center of the street, it is going to make this extremely difficult. The house I own is the house I grew up in, and was very happy to be able to keep it in the family. I have done a lot of home improvement and can not understand how a subway will increase the value of my home. Is the inconvenience of getting in or out of my driveway or is it the increase in noise going to do that? I was under the assumption this meeting was going to be more of a question and answer session, instead of just being told what you want to do. I don't understand why we have not been able to be more involved in what is being done, after all we are the people who own the property. Also confused as to where the train is going to come from below ground to above, according to the map on your website it is Kenilworth Ave, at the meeting in was Ford Ave, could you please clarify this. I realize my concerns are due to where I live, I am not one of those people that are not in my neighborhood. However I have these concerns and believe I am entitled to a response.

specific to my concerns

Thank You

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: Lynn Fildes

Address: [REDACTED]

Email: [REDACTED]

Phone: [REDACTED]

Affiliation (if applicable): _____

Have more to say?

Email us at railx@nfta.com



**Your feedback
is important!**

Please use this comment card to provide input on the Draft Environmental Impact Statement (DEIS) for the Metro Rail Expansion.

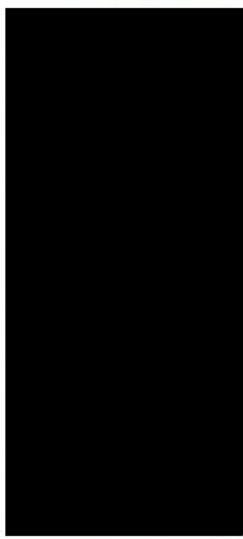
You may complete this comment sheet and drop it in the comment box, or you can mail it in.

For more information about the project, visit our website:

NFTAMetroRailExpansion.com



4 0 410 NY 142
03 MAR 2020 PM 5 L



Niagara Frontier Transportation Authority
181 Ellicott Street
Buffalo, NY 14203

14203-229899

Metro Rail Expansion



NFTAMetroRailExpansion.com



Comment Card

From: Jack Freer [REDACTED]
Sent: Wednesday, February 12, 2020 10:04 PM
To: railx
Subject: Expansion plan: YES

I have lived in Audubon for more than 30 years. I have been a faculty member at UB most of that time and have traveled to the South Campus or medical campus frequently. I would have been a frequent user of the expanded line. Now that I am retired and looking for walkable access to the city, it again, would prove helpful. I understand the lengthy process for approval, build out and operation of such a line, so I'm not optimistic that it will help me, but perhaps my neighbors...

jpf

--

Jack P Freer MD-- [REDACTED]
Clinical Professor, Emeritus, Department of Medicine
University at Buffalo, Jacobs School of Medicine and Biomedical Sciences
Co-Director, Romanell Center for Clinical Ethics and the Philosophy of Medicine

NFTA - RECORD #771 DETAIL

Status : Unread
Record Date : 2/13/2020
Submission Date : 2/13/2020
First Name : George
Last Name : French
Agency/Affiliation/Business :
State : NY
Zip Code : 14214
Submission Content/Notes :

I love the proposed expansion. While I cycle from University heights to downtown 3 seasons a year, I rely on Metrorail during winter and to get me to events downtown because of its efficiency. This expansion would allow me to be even less reliant on my car and go to some shops in the NF area that I do frequent.

I like that the rail comes above ground on NF blvd as that is likely a quicker/cheaper option. Cost of service is my biggest concern. In general, I don't see the NFTA bus/rail services as a good value, and in part ride because I value the impact of my carbon footprint. I know its a catch-22, but I think cost of service is a concern so if expansion is going to mean higher commuter pricing, I think we need to understand that now.

Submission Method : Website

From: Fruehauf, Tracy L [REDACTED]
Sent: Wednesday, February 26, 2020 3:46 PM
To: railx
Subject: Metro Rail Expansion Comments

My name is Tracy Fruehauf and I own a home [REDACTED] which runs parallel with Niagara Falls Boulevard [REDACTED]. My backyard abuts a business located on the Boulevard and will be within 100 feet or so of the proposed rail. I am also a current daily user of the metro rail and have been for the last 8 years.

POINT #1 - EXISTING PROBLEMS WITH CURRENT RAIL SYSTEM:

I've reviewed the Draft Environmental Impact Statement and nowhere in this statement did I see where the NFTA-Metro addressed any of the issues currently plaguing the existing metro rail. Issues that will inevitably continue down the proposed line. These issues include, but are not limited to:

- Public urination and defecation at the above-ground stations;
- The sale of drugs at the above-ground stations;
- Drug use at the above-ground stations;
- Littering at the above-ground stations;
- Graffiti and vandalism of the above-ground stations;

Will these proposed above-ground stations be monitored? If yes, then how? Physically by NFTA officers? By cameras? Or both? If cameras will be used, will there be enough to cover the entire station without leaving blind spots?

POINT #2 - NOISE (Section 14):

This section states that "additional noise reduction measures, including wayside noise barriers, etc. were considered and determined to be either not feasible, or not provide additional benefit beyond the measures included in this evaluation."

- Who made the determination that noise barriers were not feasible?
- Why are they not feasible?
- Was the feasibility based on cost alone?

"Additional noise reduction measures" is a section of the study that needs to be revisited. As a homeowner who is going to be directly impacted by this project, I am 100% in favor of erecting wayside noise barriers. These barriers should be located in between the businesses located on Niagara Falls Boulevard and the residential homes that sit directly behind these businesses. There are already existing 5 to 6 foot fences that separate the businesses from the residences. There is nothing hindering the construction of these barriers so why is it not feasible? What makes it not feasible?

This section further states that “warning bells will not be used at grade crossings and that gates and flashing warning signals will be used instead.” Will there be any bells, whistles, horns, ringing, dinging or other noise emitted from the trains on a regular basis?

Will the above-ground stations be equipped with speakers that play music like several of the above-ground stations? It does not appear that these speakers are monitored on a regular basis. Often times, these speakers emit nothing but loud static. At other times, the music is overwhelmingly loud. Will the new rail cars be equipped with the same high-pitched beeping when the doors open and shut?

CONCLUSION:

The impact statement prepared by the NFTA-Metro repeatedly states that there is no adverse impact in each section of the statement. Noise – no adverse impact. Vibration – no adverse impact. Property values will increase

It goes so far to state in Section 20, that

The Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) recently completed a transit-oriented development (TOD) study along the Proposed Action corridor, which identified a strong potential for TOD growth in existing and proposed station areas, and a commitment to revamp land use development patterns to support light rail transit (GBNRTC report). Since a 1/2-mile radius around transit stations is the generally accepted distance for TOD (transit oriented development) growth potential, the study area for indirect impacts is defined by this distance for the proposed stations of the Metro Rail line and a one-quarter-mile radius on either side of the Proposed Action alignment outside of proposed station areas. The same study area is used for most of the other evaluations in this Draft Environmental Impact Statement.

“1/2 mile radius around transit stations is the generally accepted distance for growth potential” – According to who? Is this based on statistics in cities like Chicago or New York? Because I highly doubt they used the statistics in the City of Buffalo. Each station is surrounded by blight. The above-ground section of the rail in downtown Buffalo is desolate. There are no stores left aside from one Rite-Aid. All of the other stores are gone. Yes, Canal-Side is thriving, but Main Street where the rail line exists in particular, is dead.

10.3.1 - Some studies on the effect of transit on property values have indicated the potential for increases in real estate values for property in close proximity to transit stations.⁴ While existing homeowners would reap benefits from increased property values, renters could experience higher rents, which could present a burden for some households, most notably for environmental justice populations. Business owners, including those in environmental justice communities, could benefit from increased foot traffic in walkable TOD communities, but development pressure and associated increased rents could result in business displacement and could change the neighborhood character within the study area.

There was a footnote after this statement and I pulled up the article used as a reference. It turns out the studies that were used to make this statement took place in the San Francisco Bay Area, San Diego, Portland, Sacramento, Chicago, St. Louis, Washington, D.C., Atlanta, and Dallas in 2008. I don't see how you can cherry pick language from studies that took place in these cities and apply them to Tonawanda and Amherst with completely different demographics. I think the study is flawed and one-sided and the data used to back up the findings are out of date.

The Lafayette/Evans Bank stations in downtown Buffalo are disgusting and unsanitary. The lower elevator at the LaSalle station is used as a urinal and is equally disgusting and unsanitary. Multiple telephone calls and written complaints to the NFTA over the course of years have gone unanswered. The NFTA-Metro does not have a reputation of

accountability or responsiveness. Why would anybody believe anything written in Draft Environmental Impact Statement?

I am not in favor of this project. It is overwhelmingly apparent that this project is targeting a poorer neighborhood with residents less likely to take legal action. This project will undoubtedly lower my property value due to the noise emissions alone. If there is not some sort of noise barrier erected, I will continue to fight this project and enlist all neighbors affected to join in as well.

MS. FRUEHAUF: I hate speaking in public but my name is Tracy and I own a home located in Tonawanda [REDACTED]
[REDACTED] It runs parallel with Niagara Falls Boulevard. [REDACTED]
[REDACTED] my back yard butts up to the business located on the Boulevard and will be within a hundred feet at the time of the proposed rail.

I'm also a current daily user of Metro Rail and have been for the last eight years. I reviewed the Draft Environmental Impact Statement and nowhere in the statement did I see where the NFTA addressed any of the issues currently plaguing the existing Metro Rail, issues that will continue down the line.

These issues are including, but not are limited to public urination and defecation at the above ground stations, the selling of drugs at the above ground stations, drug use at the above ground stations, littering at the above ground stations, graffiti and vandalism at the above ground stations.

I would like to know how these stations are going to be monitored, if they're going to be physically monitored by the NFTA officers or by cameras or both and if the cameras are used, will there be enough to cover the entire station without leaving blind spots.

In the statement it also talks about existing home owners will reap benefits from increased property values. There was a footnote after the statement and I pulled up the article as a reference. It turns out that this study and these studies that were used to make this statement took place in the San Francisco Bay area, Portland, Sacramento, Chicago, St. Louis, Washington, D.C., Atlanta and Dallas in 2008. Actually, the article was in 2008. I'm not sure when the studies took place.

I don't see how you can cherry pick language from studies that took place in these cities and apply them to Tonawanda and Amherst with completely different demographics. I think the study is flawed and the data to back up these findings are out of date. Thank you.



CITIZENS *for* REGIONAL TRANSIT

617 Main Street, Suite #201, Buffalo, NY 14203
716-691-8528 crtc@citizenstransit.org

22 March 2020

Niagara Frontier Transportation Authority
Metropolitan Transportation Center
181 Ellicott Street
Buffalo, NY 14203
railx@nfta.com

Attn: Amherst Metro Rail Extension Project Team

Dear NFTA,

Citizens for Regional Transit is pleased to offer our support and encouragement for the Amherst extension to the Light Rail project.

Please find attached our organization's official submission of public comments for the project.

Sincerely,

Douglas Funke
President, Citizens for Regional Transit

Citizens for Regional Transit (CRT) hereby addresses the scope of issues in the Amherst metro rail expansion project Draft Environmental Impact Statement (DEIS). CRT is vitally interested in how the design of transportation infrastructure impacts the economy and environment and health of our communities. We see that this project proposes changes that are immensely beneficial and important to our region.

CRT offers its strongest support for completion of the proposed light rail extension project.

CRT endorses the following contents of the Draft Environmental Impact Statement as is:

- Chapter 1 – Project description
- Chapter 5 – Community facilities and utilities
- Chapter 8 – Historic and cultural resources
- Chapter 18 – Hazardous and contaminated materials
- All appendices

Below, CRT offers comments organized by DEIS chapter. We think addressing the following topics will result in an even stronger case in support of the project.

Chapter 2 – Land use, zoning and community character

This chapter does a good job except for its description of and plans for the Muir Woods portion of the study area. The project will require a significant intrusion into the woods. The study should explain how the woods are currently used and describe anticipated environmental impacts.

Chapter 3 – Socioeconomic conditions

This chapter makes a very strong argument in favor of the project. The project will be most attractive to and serve 15 to 19 and 20 to 24-year-old age groups. These two groups constitute the largest groups in the study area. Figure 3.2 is especially informative. The study area median income is below the Erie County average.

Chapter 4 – Potential property acquisitions and displacements.

The DEIS should mention that NFTA is in conversation with the new owners of the Boulevard Mall site and hopes they will want the LRRT to cut diagonally through the site. The developer is waiting to see where the project goes and seems willing to accommodate rail in their project and is holding off on development waiting to find out if we can secure the rail extension.

The DEIS does not address who owns Muir Woods nor how much property will need to be acquired for the proposed park-and-ride parking lot and for a secure train staging and washing facility. This topic should be addressed in the final report along with environmental impacts.

Chapter 6 – Environmental justice

This chapter could be improved by noting that the proposed extension will be atypical in that it will primarily serve public university students rather than commuters going to and from work. The expected ridership will be mostly low and no-income young people having diverse ethnic backgrounds. Quoting the UB Spectrum newspaper of 3/2/2020, “Mike Montoro, a mathematics Ph.D. student and the UB Council’s student representative, said, ‘Many graduate students at UB can barely pay for food...’”

Chapter 7 – Visual resources

Figure 7-1 misleads in describing the area north of I-990 as “Suburban Office/Residential district.” This area is a North American hardwood forest with water retention ponds for I-990 and Ellicott Creek flood prevention. There is no illustration of the area north of I-990. The DEIS should include pictures of the retention ponds and the forest.

Chapter 9 – Parkland and recreational resources

This chapter is missing mention of Muir Woods. The DEIS should address this topic.

Chapter 10 – Natural resources

This chapter is missing mention of Muir Woods. The DEIS should address this topic.

Chapter 11 – Water resources

Swimming in Ellicott Creek is simply out of the question. DEIS does not make mention of the persistent flooding issue at the intersection of Maple Road and Niagara Falls Boulevard. This flooding issue would have to be addressed in some manner, either by raising the track bed or correcting drainage. Removal of forest and future development in the area north of I-990 requires planning for additional water management. This should be mentioned in the DEIS and not left to the future developers. The Proposed Action will drive the nature of the development north of I-990. The light rail park-and-ride facilities are specific to the Proposed Action.

Chapter 12 – Geology, soils and farmlands

As is mentioned, clay soils range in depth from 1 to 70 feet. These soils expand and contract with moisture and temperature. Failures of home foundations dug into clay in the Audubon community have been attributed to pressure changes due to hydration, dehydration and resultant shrinkage of the clay. Inadequate design in the building of the foundations has forced some homeowners to replace their home foundations. This should be mentioned in the report along with a statement that the light rail will be engineered to work safely on clay soils.

Chapter 13 – Transportation

This chapter is an excellent discussion of transportation issues. It is noted that UB attempts to run Stampede buses “every 5 to 10 minutes.” 5-minute headways on buses is an unattainable goal. Bunching is inevitable, and UB Stampede buses are no exception. Stampede buses do not meet their headway goals during peak periods. The DEIS should note BRT options were studied and rejected.

Chapter 14 – Noise

This topic has generated the most strident opposition to the extension project. Figure 14-4 shows several residential properties fall within the zone of Residential Adverse Impacts. All but one home on Partridge Run will be outside the zone of residential adverse impacts if the southbound lane of JJ Audubon Parkway was used for the rail extension instead of the northbound lane. A sound barrier could be used to mitigate noise for this one property.

Sound is generated from train motors. It is generated when the train stops or goes around bends.

Safety sounds are generated when the horn is used and when train doors open and close. Since all carriages will be replaced, it would be worthwhile to explore a technology solution to safety sounds. There still should be a massively loud horn that the operator can sound in case of dire need, such as a car attempting to cross the tracks by going around a crossing gate. However, other safety sound volumes could be regulated by sensors on the train that set volume according to the ambient volume. Safety noises don't have to be any louder than necessary. These safety sounds could be set to play only slightly louder than the current ambient noise level in real time wherever the train is at any given moment.

Chapter 15 – Vibration

As with noise, vibration impacts to residential neighborhoods due to operations can be mitigated considerably by using the southbound lane of JJ Audubon Parkway for light rail rather than the northbound lane.

Chapter 16 – Air quality

This chapter needs revision. Nowhere does the chapter mention that greenhouse gases are the largest single component to air pollution in the USA and that transportation is the largest contributor of that pollution. No mention is made about how much greenhouse gas emissions will be avoided by switching riders from fossil-fuel based modes of transport to locally produced (mostly hydro-produced) electric powered rail. The DEIS ought to mention the quantity of greenhouse gases that will be averted over the anticipated life of the system. The DEIS should provide the number of boardings experienced and estimate on how much greenhouse gas has already been averted over the 50 years of service of the current light rail system. The fossil-fuel reduction must be accounted for, but it isn't even mentioned.

Section 16.4.2 of the DEIS says that the Proposed Action will not reduce VMT and therefore MSAT (Mobile Source Air Toxins) will not be significantly less. We find that difficult to believe given that millions of trips will be converted from fossil-fueled vehicles to hydroelectric powered light rail. Induced demand should convert a significant number of motorists to light rail. An estimate of that induced demand should be provided in the DEIS. At a minimum the large number of UB stampede buses going between the campuses will be eliminated.

Chapter 17 – Energy

Figure 17-3 hits the nail on the head. Astonishingly, the DEIS makes no mention that the Proposed Action changes energy consumption from fossil-fuel based transportation to electric transportation. The change away from fossil-fuel to green hydro-electric energy is the most significant environmental aspect of the entire project! This should be the headline when it comes to any discussion of the transit extension project, yet it isn't even mentioned.

Figure 17-1 notes that transportation contributes 29% of US energy use. The DEIS should note that in Erie County transportation constitutes 40% of greenhouse gas pollution.

Chapter 19 – Construction effects

It's going to be dusty, noisy and dirty. We get it. The imposition won't last long. We hope the affected parties will understand that construction will be quick and that the long-term benefits will be worth it. The DEIS should emphasize these points.

Chapter 20 – Indirect and cumulative impacts

Section 20.4.1 Should be amended to say that the Proposed Action will significantly reduce traffic demand on the Millersport Highway/Grover Cleveland corridor due to two significant factors. UB Stampede buses will be eliminated and commuting demand between UB North Campus and South Campus in the Millersport Highway/Grover Cleveland corridor will be reduced due to the proposed extension. The Proposed Action will make it possible for the Town of Amherst to implement its proposal to give the Grover Cleveland/Millersport corridor a road diet and a complete street makeover. This corridor is designated New York State Bike Route 517. The Proposed Action will allow the Town of Amherst and New York DOT to address the extremely dangerous situation regarding route NY 517. Air quality and noise improvements are anticipated which are expected to be welcomed by residents of this corridor.

CRT has other concerns regarding the DEIS.

1. **Deforestation of Muir Woods:** The DEIS does not illustrate planned mixed-use development north of I-990. Neither does it show the park-and-ride facility, nor how much land will be needed for track and the rail service facility. No mention is made of the effects of deforestation that appears to be likely should transit oriented development occur between I-990 and North French Road. These issues need to be addressed in the DEIS.
2. **Severe Safety hazard at the Ellicott Complex Station:** See Chapter 1, Figure 1-22 on page 1-28. The station is illustrated in the DEIS as situated on what until recently was the northbound lane of JJ Audubon Parkway. Situating the station south and east of the southbound lane forces pedestrians to cross the busy intersection of JJ Audubon Parkway and the traffic circle. Artificially increasing pedestrian traffic at this location is completely unnecessary and dangerous. It inevitably will lead to accidents and traffic jams at peak periods. The recently removed lane should be reconstructed, but with one lane for through traffic and two lanes dedicated to UB circulating and NFTA buses allowing for passengers to safely get to the Ellicott Complex Station without having to cross the street. Because the Ellicott Complex tunnel is designed for clockwise circulation, the circulation bus ought to have passengers board and alight on the right-hand side. The loop will not work safely if the Ellicott Complex Station is on the southbound leg. Coupled with the realization that noise and vibration to adjacent residential neighborhoods can be significantly reduced by using the southbound lane of JJ Audubon Parkway for rail, there are compelling reasons to use the southbound lane instead of the northbound lane of JJ Audubon Parkway for the Ellicott Complex Station.
3. **Bicycles:** Although the DEIS mentions that the Proposed Action will provide bicycle and pedestrian access between the Ellicott Complex Station and I-990, no specific mention is made that this alignment connects UB's bike path system with the proposed Peanut Line rails to trails proposal. This potential connectivity will delight many bicyclists and deserves to be mentioned in the report.

4. **The Ellicott Complex Station and Lee Station are too close together:** We have no quibble with the Ellicott Complex Station location except that it's on the wrong side of the street. The proposed Lee Station is a mere 820 feet from the Ellicott Complex Station. This is much too close. The natural location for a station is between Lockwood Memorial Library and Clemens Hall. This location is 1,715 feet from the Ellicott Complex Station and only 400 feet from the DEIS proposed Flint Station, which eliminates the need for the Flint Station. We anticipate students will heavily use these two stations within the campus. Our proposed Lockwood/Clemens station location is already ADA compliant, having a covered walkway and elevator access on east and west sides of the station location. See figure 1. This location is closer to Alumni Area, football stadium, the new athletic complex, UB Center for the Arts, and Slee Hall, each of which are event destinations. The location is directly on the central spine of pedestrian traffic on the campus. Using this location makes the Flint station unnecessary. Some of the cost savings of elimination of Flint station could be used to make this station grade-level instead of raised platform and enclosing it for passenger comfort.
5. **Low demand accommodations.** The DEIS anticipates low ridership levels for the stretch between the Ellicott Complex Station and I-990. It is likely that this stretch may not ultimately receive the same service level as the rest of the line. Therefore, a crossover should be installed south of Ellicott Complex Station. Likewise, during summer and vacation periods, there will be no need for frequent service north of the Lockwood/Clemens (or Lee) Station. A crossover should be installed between this station and Sweet Home station.
6. **Design to accommodate high capacity when needed.** Carriage selection and platform design should be done to handle peak loads such as during Sabres games and Canalside events. For example, car selection should provide maximum flexibility for increasing capacity by allowing passage between cars. Longer 5-car platforms at new stations near park-and-rides and the DL&W station can be implemented to support longer trains when needed. This will be especially important if the light rail is ever extended to serve the Bills Stadium.
7. **Multi-modal accommodations.** We are pleased that the extension provides multi-modal accommodations such as bike racks at stations (e.g., Sweethome) and bike lanes (e.g., Niagara Falls Boulevard). It should be a design goal to maximize multimodal accommodations throughout.

Figure 1

Best location for main UB North Campus station. Lockwood Memorial Library is on the left. Clemens Hall is on the right. There is a connecting walkway. This is on the path of the preferred local alternative. We are aware of elevation and utility concerns. We think rider comfort and accessibility concerns outweigh the extra engineering costs involved, particularly considering this plan requires one less station which should offset costs.



MR. FUNKUE: My name is Doug Funkue. I am president of the Citizens Regional Transit. We strongly support this project.

I also live in the Woodridge area back here where one of our speakers is from. I have lived there since 1980 and I also personally support this project very strongly.

Complaints have been made about development and decreased property values. From my perspective and from our meeting, it will do some good for the city and for this region. If you look around the country there are cities across the United States that are expanding light rail, building new light rails and they are seeing a lot of positive economic benefits from that as well.

Talking about the short drive to downtown Buffalo. What we have in Buffalo is basically a big parking lot. That's because no one drives down there. This light rail will help do that.

We also are in support of in addition to extending the light rail out here to Amherst and to the Amherst campus, but also as the next step connecting into the east side and into the airport and eventually to the south towns.

I talk about the transportation and one of the big advantages of the light rail is that you have 25,000 riders every single day. It will be a successful line. It's guaranteed because the ridership is there and those riders are currently on a bus. It's not like those riders are not going through the town. They are now but they're on a polluting bus.

So light rail will be clean. It's electric power. It will be more efficient. It will be faster and it will be quieter, in fact, I think and a lot fewer vehicles going down through the cities into the street.

Again, just in summary, we very strongly support this project as part of making our region successful. Thank you.

NFTA - RECORD #821 DETAIL

Status : Unread
Record Date : 3/19/2020
Submission Date : 3/19/2020
First Name : CHRISTOPHER
Last Name : GIBAS
Agency/Affiliation/Business :
State : NY
Zip Code : 14072
Submission Content/Notes :

I 100% support the metro rail expansion. Expansion of the metro rail into Amherst is essential for the Buffalo region to continue its growth. I would prefer it to be underground but understand the cost constraints. It is important to make sure that it continues to be "rapid" transit, unlike the "green line" in Boston.

Submission Method : Website

Gladys Gifford

Amherst, NY 14226

March 20, 2020

Metro Rail Expansion Project
Niagara Frontier Transportation Authority
181 Ellicott Street
Buffalo, NY 14203

Dear NFTA:

The Metro Rail Expansion Project offered by the NFTA should bring many benefits to Western New York, including environmental improvements. My comments offer suggestions to improve the Draft Environmental Impact Statement (DEIS).

Concerning the Goals and Objectives:

This proposed expansion of the light rail system will reduce greenhouse gas emissions through reducing the need for riders to use private gas-powered vehicles. The DEIS should highlight this benefit.

The DEIS suggests that there is a significant population of transit-dependent commuters in the service area. The NFTA should document this item, to show that current riders of the Niagara Falls Boulevard bus would benefit from the light rail extension, including those who need daily access to downtown Buffalo.

Any future economic growth that is stimulated by this light rail extension should be concentrated in existing commercial areas along Niagara Falls Boulevard and at the university campus. These areas can support more commercial density since the basic infrastructure exists in these locations. The light rail should not stimulate Transit Oriented Development north and east of the university campus, where significant wetlands and open landscape exists. Such TOD would constitute urban sprawl and should be avoided. Rather, the light rail should terminate at the university campus.

Adverse effects of the Project on the existing neighborhoods should be acknowledged in detail. I live in Eggertsville, two blocks from the intersection of Niagara Falls Boulevard and Kenmore Avenue. I dread the destruction which will happen to the streetscape, felling trees and disrupting lawns and hedges during construction of the tunnel. My neighborhood was established prior to 1917, and I am anxious that vibrations from the tunneling will impact the foundations of our

homes. Furthermore, this neighborhood straddles the Niagara Escarpment and our homes already deal with issues from inadequate drainage, especially during heavy rainfall. The DEIS should examine the hydrology of the area in greater detail, especially for the proposed tunneling segment, in order to avoid exacerbating the existing problem [REDACTED]

There are several small businesses fronting on Niagara Falls Boulevard which are dependent on direct access by customers who arrive in their cars. How will the construction and operation of the light rail line impact those businesses? Is there any funding to help them move, if needed?

Just prior to the construction of more retail stores on Niagara Falls Boulevard next to the Youngmann overpass, I observed hawks soaring over the then "vacant" fields. Sprawl happened there, and the hawks are gone. The DEIS should make a serious effort to inventory the wildlife activity that occurs in the "vacant" lands north and east of the University of Buffalo campus, and take steps to avoid disrupting that area. All such lands should be protected from development and thereby named as a contribution to the effort by New York State to reduce greenhouse gas emissions.

In conclusion, I am pleased with the overall project because it is a tangible effort to extend the Metro Rail system to the north campus of the University of Buffalo. This was originally offered in the 1970's and is long overdue. I have championed extending the Metro Rail for over twenty years and I am dismayed that it will not happen in my lifetime.

Sincerely,

Gladys Gifford

MR. JIM GORDON: Hello. My name is Jim Gordon, G-O-R-D-O-N. Some of you people know me and I have various roles, so I have to be really careful when I'm addressing a group.

I am a member of the Board of Directors of Citizens for Regional Transit, which is an organization that highly supports this plan.

I am also at the University of Buffalo, the chair of the Professional Staff Senate's Subcommittee on Alternative Transportation, which is a mouthful.

And I am not here to represent either one of those two particular groups.

This one's for Regional Transit. Although it's in general support of this, hasn't come up with its final statement in reaction to the Environmental Impact Statement.

As far as the University goes, the University is under a lot of pressure to -- we have to comply with carbon footprint rules.

If the University doesn't reduce its carbon footprint, we're going to have to buy carbon offset credits, which is going to be expensive.

The light rail system that's being proposed over a period of maybe 30 years is going to change 200 million trips from fossil fueled powered buses over to light rail.

Now, a lot of people don't know this, but

Buffalo's light rail is a special light rail because it's primarily powered by hydropower from Niagara Falls.

Which our organization, CRT, is investigating. We may have the world's cleanest light rail system ever where -- from anywhere. So reducing our carbon footprint is really, really important.

There is a big deal going on right now between Humboldt Parkway on the 33 where people who live in that range, when the expressway came in, the pollution has been overbearing and they think they have deleterious health effects.

But if you look at the light rail that we have in Buffalo, the Main Street corridors, there's nobody complaining there that their health is being adversely affected by that system.

So on the whole, there's a lot of good reasons to support the plan. I've heard some people say, what about the stretch between 990 and UB's north campus?

That is something that our groups are looking into and we're listening to the feedback that is being shared here. All I can do is hope that everybody in the room sends some feedback, go to the website, fill in a form.

We need to show the people in the federal government that the people in this area are not ho-hum about this, that we care about what's going on.

And if there's somebody who says I'd rather see some other way to get there, put it in there, talk about it, get your neighbors interested, get feedback coming in. Thank you

NFTA - RECORD #823 DETAIL

Status : Unread
Record Date : 3/22/2020
Submission Date : 3/22/2020
First Name : James
Last Name : Gordon
Agency/Affiliation/Business :
State : NY
Zip Code : 14216
Submission Content/Notes :

Citizens for Regional Transit has submitted comments in favor of the DEIS with suggestions on making the DEIS stronger. I strongly endorse the CRT comments.

Submission Method : Website

NFTA - RECORD #816 DETAIL

Status : Unread
Record Date : 3/10/2020
Submission Date : 3/10/2020
First Name : ronald
Last Name : greene
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

It is my belief and the belief of my neighbors that any extension past UB north Campus is a waste of tax payers money and an extreme nuisance to the Walton Woods/Audubon neighborhood. The noise and vibration Will be damaging the the property that backs up to John James Audubon. Noise levels discussed in the meeting will not be abated by adding vegetation. The noise will be at a level unacceptable to the neighborhoods design The daily vibration of the train running within 100 feet from my foundation will only aggravate my foundation issues. I have had drilling and substructure surveys that prove the instability of the soil under my home. If you plan to move forward beyond UB north to the end of the Audubon parkway you need to build in the cost of purchasing my home.

If my foundation worsens due to the train we will be forced to seek legal action to not lose our investment.

Submission Method : Website

June 26, 2019

Niagara Frontier Transportation Authority

181 Ellicott Street

Buffalo, New York 14203

Our household, [REDACTED] opposes the proposed extension of NFTA's Metro Light Rail System from University of Buffalo's North campus along the JJ Audubon Parkway to the I-990. Our property abuts the Audubon Parkway which would place the rail line in our backyard. We moved to the Audubon Community 25 years ago because of the excellent school system, diverse population, natural setting filled with a variety of wildlife and the quiet.

The community has a homeowners association which regulates, via covenants, changes to property – house color changes, cutting down trees, installing play equipment, pools or fences. Prohibited are the storage of large vehicles (RVs, boats, campers) all of which would cause significant changes to the character and feeling of the community. Written application is required of all residents who wish to make such changes and permission must be granted by the association. Building and operating a train system immediately adjacent to the Audubon Community would fundamentally and irreversibly adversely change our community. Instead of birds we would only hear the trains. Therefore, residents of this community should vote to determine whether we approve of this change.

We have a bed-ridden, chronically ill, disabled adult daughter who became ill 13 years ago. No medical treatment has been effective in treating her illnesses. All that we have been able to provide her are unconditional love, hope and a quiet place to live. That place is located at the rear of our home which would be closest to the proposed rail line. Construction, frequent passing trains, whistles, bells, traffic congestion, noise and pollution will worsen her conditions.

Many homes in this part of the neighborhood have a history of foundation problems due to shifting soil. While our home has not experienced any foundation problems just from our front door we can see 4 homes with foundation problems. Many, many more have suffered from cracking foundations throughout this community. Construction of the rail bed, modifications to roads, vibrations and shaking from passing trains will exacerbate the problems that have already begun. Will NFTA take responsibility for cracking and shifting foundations, and consequential damage, and other negative impacts caused by building and operating this rail line? There are significant safety and financial factors to be considered in addition to the quality of life (and health in the case of our daughter) impacts this proposed train will cause. Would NFTA buy out homes, at fair market values, impacted by the train line? Certainly, every home whose property adjoins the rail line should have this option offered.

About a decade ago, when a natural gas pipeline was extended under the Audubon Parkway homes on our street experienced years of significant shaking every time a large vehicle drove over it. Imagine what will happen when a train passes by many times every day and every night. Clearly, this would have a major impact on existing foundation concerns as well as potentially causing previously undamaged homes to begin to crack and fail.

NFTA can easily avoid these negative impacts by ending the rail extension at the UB North Campus. This change of plan would save significant investment (taxpayer \$\$), allow NFTA to avoid the cost of purchasing property at the end of the Audubon Parkway by using state owned property at UB and avoid a major disruption to our residential community.

We strongly oppose the portion of the light rail extension that extends beyond the UB North campus. Please contact us if you would like to better understand our objections or have questions.

Respectfully submitted,

Carol Griffith

Marika Griffith

William Griffith

██████████

██████████████████

██████████████████

NFTA - RECORD #795 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name :
Last Name : Griffith
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

Many houses off of John James Audubon Parkway have foundation problems. With the Metro Rail in our backyard, we are very concerned with the structural integrity of our foundations, back yards and underground pipes shifting and breaking. We are against the Metro Rail Expansion coming down John James Audubon Parkway. It will negatively affect our lives. We live here because of the quiet enviroment and have someone with chronic illnesses living here. If the rail were to come, they would have to move away because of the noise affecting their symptoms and health. Please stop the Metro Rail Expansion from coming here!

Submission Method : Website

NFTA - RECORD #782 DETAIL

Status : Unread
Record Date : 2/22/2020
Submission Date : 2/22/2020
First Name : Kate
Last Name : Hacker
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

There will be a significant unwanted impact to people living in the Audubon area to the east of the track extension that is proposed. Noise, limited access to the parkway, impact on roving wildlife (deer, etc.), and interference with the massive movement of cars from UB and other offices at the end of the day make this proposal much worse than is indicated in the report. I have lived in the Walton Woods area for 35 years and it does not function like neighborhoods elsewhere in Amherst. The people developing these plans don't understand this area at all. Please pay attention to comments submitted by Joe Lane.

Submission Method : Website

From: Heath, Christina [REDACTED]
Sent: Thursday, February 20, 2020 12:46 PM
To: railx
Subject: Metro Rail Expansion Project Comments

I've owned and lived in my house on [REDACTED] since 2013 and feel that necessary outreach was not done by NFTA to the local residential community. Nothing was ever sent directly to my house until I heard about this project last year through my role at UB and went to a meeting at Sweet Home Middle and signed up for updates. I do not want a rail system this close to my house and would have tried to raise awareness and fight the route being so close to my home on both Maple and Sweet Home. How can you say that the preferred route is not on Millersport if you didn't do direct outreach to the surrounding community to actively seek their input?! If people wanted to live near a rail system, they would not have purchased homes in the surrounding residential neighborhoods. Millersport is much more commercialized and is certainly a much more preferable route. I'd imagine many of my neighbors would feel the same if they were made aware of the project and asked for feedback directly by NFTA. Why wasn't a survey sent to each homeowner to solicit their direct feedback and inform them of the plans? People who purchase homes in these neighborhoods have cars and would likely not rely on a rail system for transportation. The area is already heavily trafficked and years of construction would be extremely loud, disruptive and frustrating for the local community. I hope this project does not happen and feel strongly that the local community was not appropriately reached out to or informed by NFTA. I bought my home as a long term residence for my family and would not want to stay in it if this project moves forward.



Christina Heath
[REDACTED]

NFTA - RECORD #766 DETAIL

Status : Unread
Record Date : 2/12/2020
Submission Date : 2/12/2020
First Name : Jennifer
Last Name : Heim
Agency/Affiliation/Business :
State : NY
Zip Code : 14226
Submission Content/Notes :

Concerns of noise, property value, additional congestion on Blvd.

Submission Method : Website

From: Jane Henry [REDACTED]
Sent: Wednesday, February 12, 2020 4:39 PM
To: railx

First of all I would like to know how this will benefit the Town of Tonawanda. I have researched the idea and come to the conclusion it will do nothing but make this an extension of the bad neighborhoods of Buffalo.

The winners of the expansion are Amherst and the NFTA. No more bus service to the college campus, more savings on jobs. Need for bus drivers one like the buses and the rapid transfer will not need drivers for their system as it will be auto polit. Increase revenue for the system and shoppers to the Town of Amherst. Just look on Sheridan Drive and other areas as to the building of retail stores. Town of Tonawanda has no more land to build stores therefore at a loss on taxes and losing houses again another property loss of tax revenue. I could go on and on but this whole idea is not a benefit to the Town of Tonawanda. I am sick of real estate people trying to buy houses cheap do cosmetic repairs. then when they have to be torn down get big bucks for them.

This too is a scam. Just look what happened to Buffalo with the Rapid Transit it made downtown Buffalo a slum area. Look at the dynamics in Buffalo do we want that here. [REDACTED] NO!!!

Comments

Please provide your comments on the Draft Environmental Impact Statement.

Many Homeowners in 'Kenilworth Village' on Niagara Falls Blvd between Kenilworth to Page Avenues are concerned about damage to there properties and underground lines infrastructure during your 'Rail Expansion Project'. The last road constuction done in 1998-1999 caused much property damage, claims, law suits undertaken, ... with slow response times by responible agencies! For homeowners leading too ... limited dollar settlements to only damages 'Seen or Presented' at time of first claims. With no 'future claims' for further damages at later times caused by fondations cracking, settling, and walls + ceiling cracking that could be traced back to that construction. Many of us homeowners didn't realize that 'Ground Slumping' would continue (and still does ... as our front lawns and inner highway ~~Lanes~~ continue to sink into the roadway! ~~Witch~~ Witch still causes structural weahing of properties and underground infastructure lines.

Now ... With new construction and the future of more frequent ground shaking heavier than present traffic loads. I and many others on this stretch worry that this ground shaking will cause addition slumping and liquid fraction of the ground will increase. This area has the termination end of the Aquifer for 'Kenilworth Spring', still flowing about 3 feet below ground surface.

Comment Submission Deadline: 4:00pm on March 24, 2020

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: Darrell Hodur

Address: 268 Niagara Falls Blvd



Darrell L. Hodur

Email: _____

Phone Number: _____

Affiliation (if applicable): 50 years resident of Kenilworth Village, and Homeowner
Have more to say?

Email us at railx@nfta.com



**Your feedback
is important!**

Please use this comment card to provide input on the Draft Environmental Impact Statement (DEIS) for the Metro Rail Expansion.

You may complete this comment sheet and drop it in the comment box, or you can mail it in.

For more information about the project, visit our website:

NFTAMetroRailExpansion.com



BUFFALO NY 14203
04 MAR 2020 PM 5 L

Niagara Frontier Transportation Authority
181 Ellicott Street
Buffalo, NY 14203

14203-229655

Metro Rail Expansion



NFTAMetroRailExpansion.com



Comment Card

Comments

Please provide your comments on the Draft Environmental Impact Statement.

Just recently (2/26/2020) at Princeton + Niagara Falls Blvd, a car from Princeton hit another then crossed both lanes and ended-up on the sidewalk + lawn at 258 N.F.B. This again should draw attention to what residents in the area from Kenmore to Decatur Avenues have stressed at meetings... **Public Safety!**

At "Sweethome School" meetings in November + on 2/25/2020, I and other neighbors living in this stretch of N.F.B. have talked to Metro representatives about our concerns and past accidents where people and properties have been injured, killed, and damaged. (i.e. car-wheelchairs, lawns torn-up, Car-House, Car-tree, and car-curb-vent pipe damages). That was with wide 2-lane traffic bothways. Now metro-rail proposes, Single Lane restricted access corridors that will be narrow and closer to existing structures and sidewalks. Additionally; at the November meeting a 'Kenilworth Fire Department' active member (film recorded by channels 7 + 4 news) additionally talked about 'First Responders' concerns over 'Emergency Access To Areas' in this specific corridor. And the effects it would have on 'Emergency Response Times'.

Both those present (Neighbors, + Firefighter) suggested **Public Safety** would be better served if the rail line were underground through more of this corridor of narrow residential area.

Comment Submission Deadline: 4:00pm on March 24, 2020

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: _____



Mr. Darrell Hudar

Email: _____

Phone Number: _____

Affiliation (if applicable): _____

Have more to say?

Email us at railx@nfta.com



**Your feedback
is important!**

Please use this comment card to provide input on the Draft Environmental Impact Statement (DEIS) for the Metro Rail Expansion.

You may complete this comment sheet and drop it in the comment box, or you can mail it in.

For more information about the project, visit our website:
NFTAMetroRailExpansion.com

BUFFALO, NY 14203
05 MAR 2010 PM 1:00



Niagara Frontier Transportation Authority
181 Ellicott Street
Buffalo, NY 14203



14203-229999

Metro Rail Expansion



NFTAMetroRailExpansion.com



Comment Card

MS. DENISE HORBOWICZ: Hi. I'm Denise Horbowicz,
H-O-R-B-O-W-I-C-Z.

I'm standing here and I actually feel like anyone who lives along the stretch, particularly from Kenmore Avenue to Eggert Road as I do, is between a rock and a hard place.

We bought our house in 1991 and I lived through the entire DOT redesign project and widening.

At the time, as the project got modified to save the peoples' properties up near Kenmore Avenue, then it widened out to create a turning lane to create a safer environment for all of the side streets and the homeowners and businesses that existed there. It also lowered the speed limit to 35 miles per hour. We have Benjamin Franklin on my side and we have the Windemere school on the other, I believe. I could be wrong on the name.

Regardless of that, I just feel that this project -- now they're showing us images, they're talking about acquisitions.

My particular property was shown on one of these kind of on a diagonal from Longmeadow's ending.

They already took 12 feet in the front of my house, put this new sidewalk line in, moved the fire hydrant, did all the sewer work back in the day.

And now they're talking about more acquisitions, which will put those freaking trains right in my front door.

I am not going to be happy with it. I know people that are already hearing about this project for two years that have been there for as long as I have are putting their houses up for sale because we know that even though you're telling us we're going to be heard, our concerns will not be met.

Snow removal is already a prolem. Amherst already is doing things down the Boulevard to clear property. Tonawanda is not clearing my sidewalk.

My husband had two hip replacements. I don't know what I'm going to do all by myself to take care of my property.

The snow, the traffic getting in and out of my driveway and the trains rumbling by day and night. It just isn't going to work.

And also, I can see right on the corner the bus stop for the Metro bus that exists now. And if there's one or two people standing out there during the day, that's as much as I see getting on, getting off, a family here, somebody coming across from Longmeadow.

I don't know what the need is. I live in that area but I work in the southtowns. I will never get on the train to go to Aldi's.

So I don't know what we'll be using this for other than, truth be told, UB students will no longer be on the major buses racing around that bend at Millersport and North Bailey.

And that will free up all of that traffic that's happening there right on that little corner where Kentucky Fried Chicken is.

Because that is a dangerous corner; two lanes spinning around to the right to Millersport, one stationary one waiting to go down North Bailey.

I don't know why they didn't do it on North Bailey truthfully. I see that the Amherst Police Department now took over the Harley-Davidson building. Maybe that was their plan all along. That's all I have to say.

NFTA - RECORD #790 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : Denise
Last Name : Horbowicz
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

I just came from the meeting at the Screening Room regarding the Amherst expansion. I thought someone would be able to answer our questions publicly but instead it was a news grab for NFTA supporters to show us what they want..No answers on acquisitions near homes or businesses ..no answers on snow removal on sidewalks...no dimensions given on how wide the street will be to accommodate two trains... two travel lanes.. two bike lanes..but the most screwed up part of this is that the tracks are not even level with the road preventing anyone from turning left in either direction to access the bjvd...I was told I would have to do a U Turn at an intersection to go back to get into my own driveway if I was approaching from Kenmore Ave heading north...How does any of this make sense to anyone designing this ?? No regard for car traffic or Pedestrian safety because a turning lane no longer exists.

Submission Method : Website

NFTA - RECORD #764 DETAIL

Status : Unread
Record Date : 2/12/2020
Submission Date : 2/12/2020
First Name : Stacy
Last Name : Hubbard
Agency/Affiliation/Business :
State : NY
Zip Code : 14222
Submission Content/Notes :

This project is much-needed and long overdue. It is important for reducing our city's carbon footprint and traffic flow and planning for a future in which our population is likely to grow as other areas of the country become less inhabitable due to extreme weather. As someone who drives from the city to the UB's North Campus 4-5 times per week, I would happily take public transportation there and back if this extension were to happen.

Submission Method : Website

From: William James [REDACTED]
Sent: Tuesday, February 18, 2020 5:29 PM
To: railx
Subject: Seeing Public Comments

Where do I go on your website to see Public Comments on the Metro Rail Expansion Project in Amherst, including comments submitted via computer?

NFTA - RECORD #776 DETAIL

Status : Unread
Record Date : 2/16/2020
Submission Date : 2/16/2020
First Name : William
Last Name : James
Agency/Affiliation/Business :
State : NY
Zip Code : 14226
Submission Content/Notes :

How much does Bus Rapid Transit cost to build?

On average, bus rapid transit (BRT) costs \$10.24 million in 1990 dollars per mile to build. This figure is less than half that of that for light rail transit (LRT), \$26.4 million and one-tenth of metro rail transit (MRT), \$128.2 million.

Nov 20, 2009 - journalistsresource.org - Bus versus rail: Costs, capacities and impacts

Bus vs. Light Rail: Which Is Cheaper to Operate?

Data from the National Transit Database website it shows that it costs almost twice as much, on average, to move one light rail vehicle per hour versus one bus. The data demonstrates that the cost is \$233 per hour for one light rail vehicle versus \$122 per hour for one bus.

www.liveabout.com - Bus vs. Light Rail: Which Is Cheaper to Operate?

Plus ... in the next 5 years the of use of Artificial Intelligence for cabs, small busses, large busses, and trucks will explode on the scene, allowing transportation with much greater range and flexibility across our whole metro area, whereas a fixed rail system cannot do that. Buffalo locked itself into fixed rail in the early 1900's and obviously was never able to relocate its destinations. Busses can easily be re-routed, and can be diverted to service special events, unlike fixed rail. At half the cost.

So ... Bus Rapid Transit costs half of Light Rail to build, and half of Light Rail to operate, and is much more flexible.

So why is NFTA pushing this already antiquated project?

Submission Method : Website

NFTA - RECORD #769 DETAIL

Status : Unread
Record Date : 2/13/2020
Submission Date : 2/13/2020
First Name : Maureen
Last Name : Jameson
Agency/Affiliation/Business :
State : NY
Zip Code : 14226
Submission Content/Notes :

Although construction would create headaches, the reduction in vehicular traffic on NF Boulevard as well as around UB North would more than compensate for that inconvenience. Downtown would benefit tremendously by being easily accessible to the now-captive population of car-less students on both UB campuses. This extension is long, long overdue and is the only defensible choice given the climate crisis -- trains can run on electric with renewable sources.

Submission Method : Website

NFTA - RECORD #819 DETAIL

Status : Unread
Record Date : 3/11/2020
Submission Date : 3/11/2020
First Name :
Last Name : Johnson
Agency/Affiliation/Business :
State : NY
Zip Code : 14150
Submission Content/Notes :

Greetings, I live two blocks from Niagara Falls Blvd near the Boulevard Mall. I am not in favor with the expansion going along Niagara Falls Blvd. I do not understand why this path has been chosen. Maybe it was viable when the Boulevard Mall was vibrant. With the mall being sold, it will no longer be a destination. And I am not even sure why the expansion needs to go the the University at Buffalo Amherst campus. If its for the students, they have a bus to the main street campus and they can pick up the metro there. Students are not adverse to walking from place to place. That is not an inconvenience. For me driving to the main campus is not a big deal if I am going downtown. Having a metro station at my corner, will not entice me to go downtown more frequently. All I see is headaches with the effect on the traffic on Niagara Falls Blvd and Maple Road. Both are already "very" congested. Reducing the number of lanes will only make it worse. They is no way that "optimizing" the traffic signal will help the increased congestion. It will be a nightmare for those in the immediate area using those roads for normal activities. I see little upside to this expansion and only downside. Please reconsider this route, if you do think you need the expansion to the Amherst campus. Thank you for reading this.

Submission Method : Website

From: Jules [REDACTED]
Sent: Saturday, March 21, 2020 4:29 PM
To: railx
Subject: We do not support rail down Audubon

My family and I have lived in the Audubon Community for nearly 30 years. My husband and I bought our first small house here, and we fell in love with the neighborhood. After the birth of our two children, we delayed the purchase of our second home because we wanted to stay in the Audubon. So, we waited until larger home became available within the Audubon Community. Why did we do this? Well, it wasn't because there was a railway nearby! It was, and it is because this neighborhood affords a quality of life that is unmatched in Western NY. The Audubon is a quiet setting surrounded by nature, and is somewhat off the beaten path. I once saw a Canadian Eastern wolf in our back yard.

Why would anyone want to spoil this unique setting in WNY, with a noisy rail system? Enough said.

NFTA - RECORD #745 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Richard
Last Name : Karalus
Agency/Affiliation/Business :
State : NY
Zip Code : 14004
Submission Content/Notes :

I feel that expansion of the rail to the North campus is much overdue. Not only will it be a clean replacement to the hundreds of smog spewing buses that currently go back and forth all day, every day, it has the potential to reinvigorate ridership for the NFTA, as hundreds and thousands of students and staff would utilize. In addition, it would reinvigorate neighborhoods and businesses along the route, as you have a huge population of students who would now have direct access to the boulevard mall, businesses along Main Street and all of downtown. The faster you decide to build it, the better. We do not need additional studies to determine the benefits.

Submission Method : Website

NFTA - RECORD #806 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name :
Last Name : Karas
Agency/Affiliation/Business :
State : NY
Zip Code : 14216
Submission Content/Notes :

We need to make pedestrian and cyclist facilities on Niagara Falls blvd, Maple, and Sweethome safer and less stressful to use. We can't have corner radii designed for high speed turns. We can't force people to cross 7 lanes of traffic on foot. We can't expect people to choose a bicycle without physical protection from traffic.

In addition to local residents who deserve better, people come to study at UB from all over the world. Mostly, they don't have cars and don't leave Amherst. What you're building will be their lasting impression. Is this an area worth caring about?

The train plans look good though. Please build that asap.

Submission Method : Website

NFTA - RECORD #779 DETAIL

Status : Unread
Record Date : 2/19/2020
Submission Date : 2/19/2020
First Name : Eileen
Last Name : Kasperek
Agency/Affiliation/Business :
State : NY
Zip Code : 14001
Submission Content/Notes :
seems like a good idea
Submission Method : Website

From: newkelly [REDACTED]
Sent: Tuesday, March 10, 2020 5:11 PM
To: railx
Subject: Comment regarding metro rail expansion

Greetings,

I attended your public hearing at Sweet Home on February 25th. I listened to some of the speakers and I have to agree with the dissenting residents residing along Niagara Falls Blvd and John James Audubon.

I feel the current metro expansion idea is just a very very expensive bus ride. I feel traffic along Niagara Falls Blvd is already a nightmare. I find fault in limiting the traffic to one lane in each direction along Niagara Falls Blvd. I agree with the one speaker bringing to your attention how traffic could possibly back up if a UPS truck stops to make an Amazon or Internet delivery to the homes along this area. We can all see the constant deliveries in our very own neighborhoods.

You also stated the metro would be running every 12 minutes for 21 hours each day. I feel the disruption to the families living along this metro line will be horrible and I feel you should listen to their voices.

I also noticed that the travel time will take 44 minutes from the 990 to the Erie Canal harbor station. Everyone knows that we can get to downtown from this area in approximately 20 minutes. I would see no reason to take the metro because of the length of time.

If you put the metro underground, I am sure you would everyone happy. In the long run, it would cause little disruption to the communities and faster travel time. Faster travel time would definitely make people more inclined to use the metro.

Have you thought of possibly running the metro down the center of the 990 to get to the Park and Ride at the end of John James Audubon?

I know many people have already discussed running the expansion down Millersport Highway. Millersport is primarily businesses and the road can already accommodate the metro expansion above ground. You mentioned the metro would help the business community. This would bring expansion to business in this area.

I want you to know that I am for a metro expansion however I am displeased with it being considered for travel above ground and the length of time it will take to get to downtown. I know I would use the new rail line if it was faster and would not disrupt the already very busy traffic in this area.

Thank you for listening to my concerns.

Carmen Kelly
[REDACTED]

NFTA - RECORD #808 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : Jerome
Last Name : Knavel
Agency/Affiliation/Business :
State : NY
Zip Code : 14127
Submission Content/Notes :

I'll never use the metro because it will never be extended to the southtowns

Submission Method : Website

NFTA - RECORD #762 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name : Jerome
Last Name : Knavel
Agency/Affiliation/Business :
State : NY
Zip Code : 14127
Submission Content/Notes :

Please consider extending the system to the south towns, there is ample parking at the old Bethlehem site, you can only imagine the ridership you could get.

Submission Method : Website

NFTA - RECORD #789 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : Ryan
Last Name : Koester
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

Hello!

My name is Ryan Koester. I live near UB north campus.

I believe this is a great idea, to expand the light rail system.

This is a move for a better future for the region. Everyone around my age and younger that I have discussed with greatly support this.

I feel the largest impact of this project will be to the students and future generations. I remember back when i was a student at UB, one of the biggest negative remarks among my friends were that you are basically required to buy a car to live here. This project will allow more people to move around without needing a car, especially students. UB also have a very large international student population. Allowing them access to transportation will enhance businesses along the corridor.

Most of the comments I've heard so far are mostly logistical issues, which I am happy is being brought up so that the engineers involved in the project can work to solve it and make this happen. I am aware that there may be lots of negative emotional feedback, but I wish to offer my emotional support to everyone on this project, you have more support than you know! Keep up the great work!

Thank you very much to everyone that works on this project, i want to show my appreciation to the efforts being put in to make this work for everyone involved.

Thank you

Submission Method : Website

MR. KOWAL: My name is David Kowal, K-O-W-A-L. When I first started hearing about this project I was asked if I was in favor or against and I kind of expressed some neutral position. I saw no reason to be in favor or against. Then I learned they were taking out a lane on Niagara Falls Boulevard and they were taking out lanes elsewhere and my position slowly moved from neutral to against.

Looking at the stations, the stations are this far apart. I'm putting my hands as far apart as I can for the female that can't see. When I get on the U.B. campus they are this far apart. I'm putting my hands very close together for those who can't see me, only hear me. It seems to me that the purpose of this rail is to move U.B. students. So my several questions are how many Amherst residents or Tonawanda residents will be within walking distance of a station and in my count I want to exclude U.B. students because the stations are -- I am too far from a station to make this of any use to me.

My other comment is since this is being built for U.B. students, I got to mention that based on numbers that are a few years old, the amount of money that the NFTA wants to charge U.B. students for a bus pass is greater than the amount they currently pay for the blue buses. So this is being built for the U.B. students, but if I was a U.B. student I rather pay for the blue buses. It's less money.

So let's see. It's not being built for the Amherst and Tonawanda residents. It's not being built to benefit the pocketbooks of U.B. students. Who is it being built to benefit? Thank you.

From: gabriel krafft [REDACTED]
Sent: Thursday, February 6, 2020 1:56 PM
To: railx
Subject: Rail Expansion

I believe that an expansion of the rail system is unnecessary and burdensome at this time. With the constant breakdowns that we are seeing, more attention ought to be given to the existing rail and the maintenance required.

Thank-you
Gabriel Krafft

From: Lane, Joseph [REDACTED]
Sent: Thursday, March 12, 2020 12:45 PM
To: railx
Subject: NFTA Metro Rail Expansion DEIS Comment
Attachments: Solution to Key Weakness in Metro Rail proposal.docx

Solution to Key Weakness in NFTA's Metro Rail Proposal

At the NFTA's Tuesday February 25th public hearing at Sweet Home Middle School, Joseph Lane presented an analysis showing how the extension north of UB's north campus would weaken the NFTA's competitive proposal. After the meeting, Mr. Lane asked why that extension remained even after the DEIS lacked data supporting the extension (see following two pages). The assembled NFTA officials said that the pressure to keep that extension was coming from the Town of Amherst and the Supervisor Brian Kulpa in particular. Consequently, at the subsequent UB's Professional Staff Senate on Thursday, February 27, Mr. Lane asked Amherst Supervisor Brian Kulpa to explain his support for the Metro Rail planned extension beyond UB's north campus, despite the multiple weaknesses revealed by the DEIS which could jeopardize the first round of Federal funding.

Mr. Kupla said he wanted to be perfectly clear. His position has been – and remains – to increase NFTA public transportation to and through a greater portion of north Amherst, particularly areas currently underserved or unserved. He is indifferent to the mode of transportation (e.g., traditional bus, BRT or LRT), so long as service is expanded. Mr. Kulpa stated that is the NFTA that has narrowed the option for north Amherst service to the Light Rail extension!

So, as an Audubon Community resident, an Amherst home owner, and UB employee, Mr. Lane is left uncertain as to where the demand for the extension beyond UB resides. Is this finger-pointing between the NFTA and the Amherst Supervisor an effort to secure deniability should this project fail financially at the front end or post implementation? Or is a simply mis-communication between factions that are not exactly working constructively to deliver the most viable transportation – and most importantly in the short-term – a competitive proposal for securing the necessary Federal funding?

To clarify the situation, Mr. Lane proposes the following compromise to NFTA: Eliminate the 1.7 mile Metro light rail extension beyond UB North Campus, and instead commit to design and deliver a set of new routes through that same corridor and out to the under-served neighborhoods as designated by Amherst Town Board. This would meet the NFTA's assumed desire to submit a proposal demonstrating a solution to an

important inter-campus transportation problem while maximizing transportation-oriented development, and delivering the flexible route public transportation services needed in North Amherst.

Critical Weakness in NFTA's Metro Rail Extension Proposal

The FTA's application for the New Starts fund contains multiple five-point criteria, including sources of capital construction, estimated operating revenue, and narrative regarding land use and economic development information, all integrated into a *fiscally constrained* long-range transportation plan.

Competing proposals will be attempting to alleviate traffic congestion, reach unserved population centers, or serve an existing commercial core with further development potential. In contrast, the NFTA's proposal has three legitimate but less compelling goals: substituting light rail for an operational bus system between two campus, revive the commercial/ residential corridor in between and extend the rail into a region without any form of public transportation.

In the FTA's application, the NFTA's calculations and projections will be totaled or averaged across the entire route, so any under-performing segments weaken the overall proposal's merit. I submit that in this case, the 1.7 mile extension beyond the UB North campus includes *several* glaring weaknesses that diminish the proposal's overall strength:

First, the extension beyond the core Metro ridership involves the expense of 3.4 miles of additional track, two additional transit stations, and ancillary modifications to the travel path. In addition, the NFTA will need to operate at least one and most likely two additional trains along this 3.4 stretch throughout the twenty-hour day, in order to keep all trains on the average 12 minute station schedule. These costs make the overall project more expensive than necessary to serve the core ridership between UB campuses.

Second, the Draft EIS emphasizes opportunities for Transit-Oriented Development, which are more compelling within the higher-density NFB and Maple Road corridor than they are along the sprawling 1.7 mile JJ Audubon corridor, or beyond the I-990 overpass where single family residences are filling most of the available land. The DEIS cannot even list a bus route along than northern extension corridor, and is relying on what is called the 'synthetic method' to estimate future ridership. The lack of objective data for this section works against the argument of a compelling need for light rail service.

Third, the Draft EIS lists both noise and vibration as significant negative impacts on residents bordering the proposed path. The report describes moderate to severe noise impacts on the Residents of Walton Woods within a 170 foot range when trains are running under *'as new'* conditions, an unreasonable assumption over time. More likely the noise will be *severe* every twelve minutes for *twenty hours* per day, for the sixty or so residences along JJ Audubon Parkway, and *moderate* for the remaining one hundred plus residents in Walton Woods. The

vibration impacts will occur at the same rate and may also exacerbate existing foundation problems for those same residents built on hydraulic clay. These negative impacts weigh against the NFTA's claimed benefits.

Fourth, the Draft EIS indicates that it will reduce traffic on JJ Audubon Parkway by 100 cars per day. But proposal reviewer's will readily see that the remaining 300 cars per day will now double the traffic on the two southbound remaining two traffic lanes, while adding 300 train cars (3 cars per train, 5 trains per hour, for twenty hours) per day on the two former northbound traffic lanes. They may even question the wisdom of planning the rail for the northbound lanes, when the southbound path would have alleviated the negative residential impacts.

Fifth, the DEIS concludes that all of these financial social costs will provide Metro Rail service to NFTA's own estimate of fewer than 100 riders per day on the line north of UB. That is one transit fare per 3 car train per day, on average. Although there may additional demand to this area from elsewhere in the NFTA's system, the absence of existing bus routes hampers the ability to present such numbers.

The reaction of people in community groups whom I have asked to stop and consider the construction and operating costs of the 1.7 mile extension north of UB -- as compared to the potential for transit-oriented development, Ridership Revenue and negative community impact - is that this extension is superfluous. I am concerned that the FTA may have the same response.

Eliminating the 1.7 extension removes the more vague elements of the proposal, eliminates the 'synthetic analysis' and focuses the analysis on the critical goal of linking the two campuses, and supporting the core commercial/residential corridor.

Joseph P. Lane



MR. LANE: I'm Joseph Lane. I do live in the Audubon community and yes, I have read the report. The NFTA application for the new start fund contains multiple five point criteria including source of capital construction, operating revenue and narrative regarding land use and economic development information all integrated into a fiscally constraining long range transportation plan. These estimates and calculations are total or average across the entire route. So any under performing segment will weaken the overall proposal's merit.

What I'm saying is as a person who has been writing grants at U.B. for over 30 years, about eight-five million dollars worth. So, I think there is a real flaw in the proposal that should be addressed.

I'm here to assert that the 1.7 mile extension beyond U.B. north campus, includes several weaknesses that diminish the proposal's overall strength.

First, the extension beyond the core medical ridership involves the expense of 3.4 miles of additional track, two additional transit stations and ancillary modifications to travel.

These construction costs make the overall project more extensive than needed to serve the core ridership between the U.B. campuses. In addition, the NFTA will need to operate at least one and more likely two additional trains along this 3.4-mile stretch through the 20 hour day in order to keep all trains on the average 12 minutes station schedule.

Second, the Draft DIS emphasizes opportunities for transit oriented development and urban planning, not suburban, not exurban, not an agricultural district, but an urban planning concept maximizing the density of commercial and residential development within walking distances of a transit station.

However, there is basically no opportunity along this 1.7-mile road which is entirely built out along John James Autobahn Parkway. The potential for any high density development north of the 990 is limited to several small parcels south of North French Road with existing single family homes to the west and additional family homes being developed around the retention pond to the east.

My understanding is the recent plan to do high density development north of the I 990 was scrapped by the developer. Note that despite the Audubon Parkway's office buildings being built out and fully occupied over several decades, and I built my home there in 1986, the NFTA has never had sufficient demand to even run a bus line along that route, not even a bus, which argues against any fantasy about a future ground swell of demand for service to the buildings or the Amherst ground center complex.

Third, the Draft EIS lists moderate to severe noise impacts on the residents of Walden Woods within a 170 foot range when trains are running under as new conditions. Well, the as new assumption is not reasonable over any length of time and the sound will simply not stop at 170 feet.

So it's more reasonable to assume that under normal operating conditions the noise will be severe every 12 minutes for 20 hours per day for the 60 or so residents along the Audubon Parkway and moderate noise impact for the remaining hundred plus residents comprising the rest of Walden Woods neighborhood.

In addition, the DEIS lists the vibration effect of the operating trains, which the report does not mention is on a bed of clay that has already caused foundation problems to the same residents.

I can assure you that my neighbors will take whatever action is necessary to keep negative impacts from arising while protecting the integrity of their home and since there is a three minute limit, I won't be able to speak about the fourth impact of supposed reduction of vehicles, when in fact it's going to add three hundred train cars to the Audubon Parkway per day. The NFTA's estimate is of fewer than one hundred riders per day.

How can the NFTA, Federal Transportation Authority, possibly justify expending public funds for that level of service without it being treated as some local boondoggle. Thank you for your time.

NFTA - RECORD #785 DETAIL

Status : Unread
Record Date : 2/25/2020
Submission Date : 2/25/2020
First Name : Joseph
Last Name : Lane
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

Statement read aloud (through Third point) at February 25th Public Hearing:

I am Joseph Lane, a resident of the Audubon Community. The FTA's application for the New Starts fund contains multiple five-point criteria, including sources of capital construction and operating revenue, and narrative regarding land use and economic development information, all integrated into a fiscally constrained long-range transportation plan.

These estimates and calculations are totaled or averaged across the entire route, so any under-performing segments weaken the overall proposal's merit. I submit that in this case, the 1.7 mile extension beyond the UB North campus includes several glaring weaknesses that diminish the proposal's overall strength:

First, the extension beyond the core Metro ridership involves the expense of 3.4 miles of additional track, two additional transit stations, and ancillary modifications to the travel path. These construction costs make the overall project more expensive than necessary to serve the core ridership between UB campuses. In addition, the NFTA will need to operate at least one and most likely two additional trains along this 3.4 stretch throughout the twenty-hour day, in order to keep all trains on the average 12 minute station schedule.

Second, the Draft EIS emphasizes opportunities for Transit-Oriented Development, an urban planning concept maximizing the density of commercial and residential development within walking distance of a transit station. However, there is little opportunity along this 1.7 mile route, which is entirely built-out at the proposed Town Center Station on JJ Audubon Parkway and up to the proposed final Transit Station north of the I-990 overpass.

The potential for future high density development north of the I-990 is limited to several small parcels south of N. French Road, with existing single-family homes to the west, and additional single-family homes being developed around the retention ponds to the east of any JJ Audubon extension. I understand that a previously proposed high density project near North French road has been down-scaled which perhaps helps account for the current ridership estimates at this location.

It is important to note that despite JJ Audubon Parkway's office buildings being built out and fully occupied over several decades, the NFTA has NEVER had sufficient demand to even run a flexible bus line along that route, which argues against any fantasy about a future groundswell of demand for service to those buildings or to the Amherst Town Center complex.

Third, the Draft EIS lists moderate to severe noise impacts on the Residents of Walton Woods within a 170 foot range when trains are running under 'as new' conditions. Well, the 'as new' assumption is not reasonable over time, and the sound will not simply stop at 170 feet, so it's more reasonable to assume that under normal operating conditions, the noise will be severe every twelve minutes for twenty hours per day, for the sixty or so residences along JJ Audubon Parkway, and moderate for the remaining 100 plus residents comprising the remainder of the Walton Woods neighborhood.

In addition, the Draft EIS lists the vibration effects of the operating trains which (the report does not mention), is on a bed of hydraulic clay that has already caused foundation problems for these same residents. I can assure

I live [REDACTED] in the Town of Amherst. Given my location, I have the following concerns with, and comments on, the NFTA's Draft Environmental Impact Statement ("DEIS").

NOISE/SAFETY

According to DEIS Section 13.2.1, traffic diversion (i.e, using side streets to avoid signals, traffic congestion and light rail operation on major surface roads) was not considered as part of the NFTA's analysis although the NFTA assumed that "potential diversions would not be significant and that traffic would likely divert to major roadways outside the study area." The assumption is erroneous.

Currently, Allenhurst Road residents are subjected to significant traffic noise coming from vehicles using Allenhurst (it is the last through street before the intersection of Kenmore Ave. and Niagara Falls Boulevard) as a cut-through to avoid the lights/traffic on Niagara Falls Boulevard. These vehicles include speeding motorcycles ("crotch rockets"), muscle cars with the associated engine noise and cars with amplified music emanating from sound systems at a level that vibrates house windows.

Accordingly, the logical assumption is that traffic diversion will increase as yet one more mode of transportation, with its signals, crossings, etc., is added to the surface of Niagara Falls Boulevard. Even more drivers will want to avoid the Boulevard to the detriment of the Allenhurst Road residents in terms of use of their property e.g, closed windows necessitated by traffic noise) and safety (speeding vehicles which the stop signs at the cross streets do not deter).

It would seem that the solution to these issues would be to extend the light rail line underground through those residential areas on Niagara Falls Boulevard and only come above ground where commercial development already exists. After all, this was the plan for Bailey Avenue before it was scrapped for the professed reason that "new development" had greater potential on Niagara Falls Boulevard. (a topic commented upon below).

Alternatively, there should be some effort to address traffic diversion as a result of the addition of the light rail line, whether it be a change in the traffic pattern which would limit access to Allenhurst off Kenmore and/or Niagara Falls Boulevard, or some sort of "calming" devices (speed bumps, perhaps) to discourage the use of the roadway.

CHARACTER OF THE NEIGHBORHOOD

The DEIS appears to be based in part on the stated goals of the Amherst Boulevard Central District Opportunity Zone. One of those goals is the “protect[ion] and enhance[ment] of the surrounding residential neighborhoods.” DEIS Section 2.3. Yet, the DEIS (and public statements of the supervisors of the Towns of Amherst and Tonawanda) appear to give short shift to this goal, instead focusing only on the purported economic benefit to the towns and to a lesser extent, their residents. The economics are only one factor in what makes up a thriving, healthy neighborhood and should not be the sole foundation underlying the expansion of the Metro Rail, particularly when that foundation appears to be factually flawed.

As noted in DEIS Section 2.2.1.1, the southern portion of the expansion encompasses residential neighborhoods, not only directly adjacent to the proposed expansion, but also in the areas behind the houses on the east and west of Niagara Falls Boulevard. The block on which I live [REDACTED] is, with very few exceptions, stable and consists of single family, owner-occupied houses representing a diverse mix of retirees, young singles and married couples as well as families with children and teenagers. Homeowners take care of their property and renovations in the area to update the 1940’s and 1950’s built homes are on-going.

However, there is a disturbing trend occurring in the area bounded by Kenmore Avenue, Niagara Falls Boulevard, Longmeadow Road and Bailey Avenue. Absentee landlords, generally from downstate or out of state, are purchasing properties simply for investment purposes, that is, student housing. For example, at the northwest corner of Allenhurst and Kenmore, a New Jersey resident bought a two bedroom, one bath single family home in 2019, and installed a wall in the living room, turning the house into what is, essentially, a dorm for four unrelated students.¹ The property already is beginning to deteriorate.

The NFTA states the “student population will be a major ridership generator” (DEIS Section 2.2.) and that the rail project is “expected to double ridership of the current system and link UB’s north, south and city campuses” “NFTA Proposes New, Cheaper Route for Metro Rail Extension to Amherst,” The Buffalo News, Nov. 20, 2018. Yet, the DEIS notes the NFTA analysis does not establish that community character will be adversely affected by the project. DEIS Section 2.4.3. There is no doubt that this increase in ridership comes at the cost of increased rental housing and subsequent deterioration of stable neighborhoods as evidenced by what has occurred in the University District in the City of Buffalo. This surely is not “protection and enhancement of the neighborhoods” and the NFTA needs to

¹ I have no actual knowledge that the same trend is happening in the Town of Tonawanda. However, personal observation indicates to me that students are living in housing on and behind the west side of Niagara Falls Boulevard.

acknowledge the significant downside. In fact, Amherst Town Supervisor Kulpa has previously alluded to this downside when addressing the hope that extending the Metro Rail extension will “help move student housing of residential areas and into high density retail and commercial areas along Maple Road and the Boulevard Mall site which may be converted into mixed use” (emphasis added). “Metro Rail Extension Could Spur Local Economy,” The Buffalo News, Sept. 24, 2019.

Arguably, the best way to protect and enhance the residential neighborhoods adjacent to Niagara Falls Boulevard is to discourage absentee landlords who see an opportunity for expanded student housing in the area. This could be accomplished by eliminating the proposed stations on Niagara Falls Boulevard. Not only would this reduce the overall cost of the expansion, but also the goal of increased student ridership from all SUNY campuses in the area still would be satisfied. It also would have more of an impact on the promotion of student housing in the area envisioned by Supervisor Kulpa, that is, the high density retail and commercial areas along Maple Road. *Id.*

FLAWED ARGUMENTS SUPPORTING EXPANSION

Student Housing - Supervisor Kulpa’s quote from The Buffalo News is just one example of the flawed (and disingenuous) arguments that have been put forth in support of the expansion project. First, in what world does the addition of a mere 375 units of student housing for the SUNY students in Buffalo somehow alleviate the problems associated with having absentee landlords buy up residential properties to convert to student housing? Moreover, possibly changing the Boulevard Mall site to “mixed use” suggests upscale housing and shopping, which is not conducive to additional student housing.

Transportation - UB has a “priority of providing a 20-minute ride between north and south campuses.” NFTA Proposes New, Cheaper Route for Metro Rail Extension to Amherst,” The Buffalo News, Nov. 20, 2018. There is currently adequate transportation in place for students through the shuttle buses. It is hard to believe the expanded light rail route is going to be somehow faster than taking the bus. Additionally, there is adequate public transportation with a variety of routes running from the University Station and elsewhere in the corridor. Finally, it is significant that Western New York does not have the population density to support a thriving (and profitable) light rail system by attracting a new and different rider population. Indeed, Buffalo’s population experienced an 8% decline between 2018 and 2019. Consequently, driving to work, shopping and entertainment is not onerous as it is in other cities which support a subway system and with the increasing popularity, availability and affordability of electric vehicles, any rationale for an expanded light rail system is undercut.

Commercial/Residential Development - A significant part of the argument in support of NFTA’s proposed expansion is based on the towns’ desire to increase their tax base through redevelopment and new development along the Niagara Falls

Boulevard corridor. The potential for development is purely speculative and not grounded in factual evidence. Even the language used in the DEIS acknowledges this fact, *see e.g.*, the Metro Rail expansion “could encourage residential and commercial growth by providing improve transit access” (emphasis added) DEIS Sections 20.3.1 and 20.4.1.

Town of Tonawanda Supervisor Emminger told The Buffalo News that “there’s things that are attractive to bringing small larger businesses on the Amherst side and along that corridor that’s beneficial to [the towns] . . . “Metro Rail Could Spur Local Economy,” Sept. 24, 2019. This statement overlooks the fact that brick and mortar stores are failing. More importantly, there are already what appear to be only marginally successful small businesses on the Tonawanda side of Niagara Falls Boulevard. There is no evidence that the expansion would improve the business atmosphere in the area, much less add to it. In fact, the evidence derived from the original Metro Rail installation along Main Street indicates no spurring of new development.

Property Value Appreciation – Supervisor Emminger has stated that “[the Town of Tonawanda has] already seen appreciation in values over in the Kenilworth area [west side of Niagara Falls Boulevard near Kenmore Avenue] since the NFTA announce that they were going to proposing the project,” an area he has previously called “tired.” “Metro Rail Expansion Could Spur Local Economy,” The Buffalo News, Sept. 24, 2019. This statement is disingenuous at best.

It has been much publicized that there is a housing shortage in Western New York and that house prices are on the rise, a situation created in part by bidding wars for available property. This certainly happened on Allenhurst. The single family, two bedroom home mentioned above went for approximately \$12,000 over asking price. This example may also provide some evidence of another phenomenon. Downstate investors, whether unwittingly or not, pay prices which seem excessive to the average Western New Yorker, possibly because the investors come from areas where housing prices are exorbitant.

In short, there are many factors that contribute to the appreciation of property values. To say that the expansion of the Metro Rail is at the heart of the appreciation is simply erroneous.

Thank you for your consideration.

Donna M. Lanham



NFTA - RECORD #755 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name :
Last Name : Lannen
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

What consideration has been given to the residential properties? The section of Niagara falls Blvd from Eggert to Kenmore Ave is heavily traveled. If you take out a lane of traffic to put in this rail it will be a real mess and further more, do the people living there really want this rail running in front of their homes? I believe this will greatly impact their property values.

I really do not see how this will really benefit the community. It will make driving a nightmare for those of us who drive Niagara Falls Blvd in that area on a daily basis. I do see this as a great deal for UB. However for the everyday person It seems to be just another rail to nowhere.

Submission Method : Website

MR. LEWIS: I don't have remarks prepared. Like the lady did, I thought it was going to be a Q and A kind of thing.

I am a Tonawanda resident. I live on Decatur. I just wanted to make sure that I indicated that I was against this and that guy kind of was doing my job for me. A show of hands, is anyone for this?

My issue I guess was I drive down the Boulevard everyday and it's two lanes, currently. With this proposal it was going to be one lane, so what if there is a garbage truck or a bus or FedEx? So that was a concern of mine and the fact that Decatur was going to be the first stop was a concern of mine.

Really, I guess that was it and then emergency vehicles. The Fire Department is right there. So I didn't know how they, the fire trucks, would be able to move. So, thank you.

MR. LISCAVAGE: I'm a resident of Niagara Falls Boulevard, been there since I was a kid. This isn't a proposal. It's an imposition. We're getting it jammed at us. We weren't asked about it. The widening of the Boulevard, I was there for that. I was there for everything. The Boulevard went from a four lane highway to a five lane super highway. It has 29,000 cars that go past my house everyday.

Now, when they widened the Boulevard I was against it. Okay. So they bring traffic closer to the house, which is not safer but okay. We all, you know, did what we had to do. We decided that having a middle turning lane would be safer. Whatever, okay. So we lost some frontage there.

Now, you want to put a train down an already overtaxed street. That to me is an abysmal waste of taxpayer's money like I've never seen in my life. That's a joke. Anyone that thinks that a train -- I sit in my living room everyday and I see the empty buses up and down the street. So I'm going to listen to an empty train. Come on. That's ridiculous. That's the dumbest thing I've ever seen in my life. It's going right down

Niagara Falls Boulevard to Maple Road and then taking a severe right. Is that so that somebody can get more track mileage so that they can qualify for more money?

I mean, anybody in their right mind has to see that this is a terrible waste of hard earned taxpayers' money.

I work in Buffalo and I drive down Fillmore Avenue everyday. It's a joke. The streets are horrible. Why don't you use that money to fix the street or something? I mean, it's ridiculous. And to sit here and listen to this garbage about your proposed studies and where you got those numbers from. Come and stay at my house for a month, seriously. Do your studies there, you know.

Everyone likes to say, okay, well, it's going to be so wonderful, we're going to have this train, it's going to make everyone happy. It's a joke. I don't want this train at all. I would say, you know, the logical thing is to put it down Millersport, but I don't want those people to suffer either. Why should they? It's a terrible waste of taxpayers' money.

You should be ashamed of yourself. The NFTA should be ashamed of themselves for wasting money like that. I don't see any proposed purpose for this thing. I don't see any benefit and then you're going to tell me and lie to me that it's going to increase my property value? You got to be kidding me, really. I never heard such garbage in my life. I'm ashamed. This is ridiculous.

I didn't even know about this until a couple weeks ago. They told me they're going to put a train down the middle of your street. I was like you've got to be kidding me. I was there when they were trying to put the existing railway in and I remember the vibration all the way to the south campus. It's just ridiculous. If you want to pay for that garbage, go ahead. I can't even. This is so stupid.

NFTA - RECORD #734 DETAIL

Status : Unread
Record Date : 1/26/2020
Submission Date : 1/26/2020
First Name : Marie
Last Name : Malinowski
Agency/Affiliation/Business :
State : NY
Zip Code : 14207
Submission Content/Notes :

I wouldn't mind the trains be expended if you can get to them. And if it wasn't just to the Subaru

Submission Method : Website

NFTA - RECORD #784 DETAIL

Status : Unread
Record Date : 2/25/2020
Submission Date : 2/25/2020
First Name : Judy
Last Name : Mann
Agency/Affiliation/Business :
State : NY
Zip Code : 14051
Submission Content/Notes :

Please blacktop the peanut line so people of all ages (78) may use it without the fear of falling in an unseen hole while walking in our beautiful town. Thank you, Judy Mann

Submission Method : Website

NFTA - RECORD #813 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : Lany
Last Name : Margo
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

This is a great idea finally I'm from nyc I have never seen such poor public transportation no trains busses take to long no stops on Suburb streets unless it's a big street put a bus route on Harrison ave it goes all the way from the blvd to Colvin in the town of Tonawanda thanks

Submission Method : Website

NFTA - RECORD #792 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : diane
Last Name : marzec
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

no one in northtowns wants this subway; no one uses it downtown; it destroyed business there and will destroy business here. You will destroy business on Niagara Falls Blvd.

Look at the southtowns that have a problem with transportation into the city especially due to skyway.

NO Extension Wanted!

Submission Method : Website

NFTA - RECORD #738 DETAIL

Status : Unread
Record Date : 2/5/2020
Submission Date : 2/5/2020
First Name : Michael
Last Name : Maute
Agency/Affiliation/Business :
State : NY
Zip Code : 14086
Submission Content/Notes :

As an employee of UB who has occasion to travel between the UB North and South campuses, I would like to voice my support for the light rail extension between the two campuses. In addition to the environmental positives associated with not driving back and forth, the ability to spend that transit time to complete some productive work would be an added plus!

Submission Method : Website

NFTA - RECORD #757 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name : Bethany
Last Name : Mazur
Agency/Affiliation/Business :
State : NY
Zip Code : 14226
Submission Content/Notes :

So excited to see this happening. I think this would be huge for our communities.

Submission Method : Website

From: JDMECCA [REDACTED]
Sent: Wednesday, February 19, 2020 8:32 AM
To: railx
Subject: Rail Expansion

How does the NFTA propose to fund the operating and maintenance costs associated with rail expansion. Is the county on board with higher taxes?

MR. LOUIS MERZACCO: My name is Louis Merzacco. My affiliation is just that I'm a resident of Erie County. I now live in Wheatfield, lived in the Niagara Falls Boulevard, Eggert area for a number of years.

And what I want to say, this project is a very ambitious project. And unfortunately, it's too late.

This should have been done 30 years ago when Audubon and North UB campus was under development. That's when we needed it.

But what happened? All of our funding was taken away and disbursed to the outer areas and were eliminated.

What assurance do we have that the NFTA isn't doing what they've always done in the past? Wasted all of our taxpayer money with all of these grand proposals and never come to fruition with them.

How do we know it's not going to happen this time? They're going to spend money, hundreds of millions of dollars getting this proposed and then when they go for the funding, we'll be told the same thing we're always told, we can't afford to do it because we have to do such and such a project in New York City or we have to do such and such a project on Metro-North.

We lose everything in Buffalo thanks to New York City and Albany. And until the NFTA is not controlled by New York City or Albany, we're not going to get anything. However, I'm still going along. This project should go on. It should go forward. It should happen.

And if we want Buffalo to become the city that we were a hundred years ago, we have to do something like this. Thank you.

NFTA - RECORD #804 DETAIL

Status : Unread
Record Date : 3/4/2020
Submission Date : 3/4/2020
First Name : Maureen
Last Name : Milligan
Agency/Affiliation/Business :
State : NY
Zip Code : 14214
Submission Content/Notes :

PLEASE, PLEASE make this a reality!!! This is the ONLY path (literally) forward! This is the FUTURE of transportation! Stop the wasteful, polluting UB Stampede buses!!!

Submission Method : Website

Comments

Please provide your comments on the Draft Environmental Impact Statement.

- I would like to know how Brighton Rd. would possibly be affected by this. Brighton at Niagara Falls Blvd. is already a mess, and I only see that getting worse.
- Park + Ride is proposed for Boulevard Mall, which was recently sold. Is the NFTA certain that will still be possible?
- Does the elimination of bells/whistles at Audubon comply with ADA requirements? I have friends who are blind. Safety should always come first!
- How is this project going to affect Eggert Road? I'm assuming it would be at Eggert and Niagara Falls Blvd.

Comment Submission Deadline: 4:00pm on March 24, 2020

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: Maureen Miranda

Address: _____

Phone Number: _____

Affiliation (if applicable): _____

Have more to say?

Email us at railx@nfta.com



From: Anita Mitchell [REDACTED]
Sent: Monday, March 23, 2020 12:44 PM
To: railx
Subject: metro rail expansion

30 years ago I supported the expansion of the metro rail line into Amherst but I oppose it now. As planned it will be extremely expensive and disruptive, not only during construction but also during operation, given the proposed route. I also fear there will not be the hoped for increase in ridership; the demographics are against that.

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.

NFTA - RECORD #810 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : Michael
Last Name : Muehlbauer
Agency/Affiliation/Business :
State : NY
Zip Code : 14221
Submission Content/Notes :

I am 100% supportive of this project in it's entirety. I would actually like to see additional expansions, especially to the airport. My only critique of the current plan would be of the Niagara Falls Blvd. station at the Boulevard Mall. The plan currently shows the station in the middle of the boulevard with the rail then traversing the mall property to merge onto Maple Rd. I would MUCH prefer to see the station moved to within the current mall property entirely. There appears to be room within the current parking lot, or perhaps if the bank property was purchased/obtained. This would further reduce traffic queuing and wait times as well as increase rider safety by eliminating the need to cross traffic lanes to reach the platform. It would increase the use of the station as a park and ride location as well. Considering the rail is already traversing the property, it wouldn't be much more of an encroachment. In addition, with the Town of Amherst is in discussions with the property owners for future use, this would be an opportune time to propose this.

Submission Method : Website

NFTA - RECORD #809 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : James
Last Name : Mueller
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

Vehemently against this extension through my backyard for a mere 100 projected riders per day. Your projection was ridiculously inflated at that!

No private business could ever sell management on a capital expenditure that would take 100 years to pay back! That's a ""synthetic" number just like yours.

Submission Method : Website

NFTA - RECORD #788 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : James
Last Name : Mueller
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

It's in my back yard, and I will fight to the end to stop this waste of taxpayers money! A real business could never justify the added cost of this 1.3 mile extension to their management bean counters with any accounting trickery or gimmick!

There is just politics and corruption to push this on us, and their true agenda will never come out in the news. The NFTA characterised this meeting as mostly positive on chi.2 news this morning, and this was a bare faced LIE! I was there and only three people (plants) were for it. The rest of us said " no way" in very loud voices. So "fake news" has already started.

Submission Method : Website

NFTA - RECORD #747 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Ellen
Last Name : Murphy
Agency/Affiliation/Business :
State : NY
Zip Code : 14216
Submission Content/Notes :

I have been in full support of extending the rail since I moved her 20 years ago and was first approach to sign a petition. It is time.

- 1) Climate change-public transportation is needed especially since the federal gov't is doing nothing to decrease dependency on oil nor investing in infrastructure.
- 2) Match employers with employees. Getzville has the need for factory workers who do not have easy public transportation to get there. And Crosspoint is one of the largest office parks in WNY.
- 3) It's embarrassing that our rail goes to "nowhere" especially when talking with visitors. Our region heavily relies on tourists.
- 4) Younger generations want it and are buying cars less.
- 5) I just came back from visiting China where they are heavily investing in rail and subways to reduce cars on the road, be most efficient and protect the environmental. It's astonishing how far US is falling behind, let's be proactive. Let's not wait/argue for another 20.

Submission Method : Website

NFTA - RECORD #801 DETAIL

Status : Unread
Record Date : 3/1/2020
Submission Date : 3/1/2020
First Name : Thomas
Last Name : Naber
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

I am very much in favor of the proposed action. I currently live about 0.5 miles from the proposed Decatur station, and currently use the University station to get downtown fairly frequently. I think it would be fantastic to be able to walk to a station and get downtown fairly quickly. My only main concern is pedestrian safety, particularly at Longmeadow and Niagara Falls Boulevard. That intersection sees a lot of pedestrian traffic and I think it is important that the planning takes that into account along with motorist and train traffic. Overall, though, the proposal looks great!

Submission Method : Website

From: Linda Nash [REDACTED]
Sent: Tuesday, March 24, 2020 8:57 AM
To: railx
Subject: metro rail expansion

In spite of the efforts of NFTA representatives to evaluate the impact of a Lite Rail in Amherst, I am not convinced of the efficacy of their plan or their ideas. As a resident of the Audubon Community, my backyard would back up to the lite rail line. We moved to this community because of it's quiet and natural setting. Flashing lights, bells, and low vibrations until 2am are not in keeping with our values or the peace we seek.

Faulty ground structures including, a high water table and underground sand pockets already contribute to shifting homes and cracked foundations. Building a rail through the community would further hasten the collapse of existing homes. Why disrupt an entire neighborhood with this massive intrusion when alternative routes for the rail exist.

Why is the rail not being run down Millersport Highway where there is commerce and the space for a rail without disrupting a residential community? Niagara Falls Boulevard also offers access to commerce and space for a rail without the disruption of a residential community. Perhaps it is an issue of cost, but isn't our community worth preserving? The community would incur congestion and more traffic should a rail be built down the Audubon Parkway. The consequence of building the rail in the Audubon Community is the removal of everything natural and peaceful.

Finally, I rarely travel downtown, nor do my neighbors. The occasional hockey game or concert or art museum venture is not enough to justify the radical change the rail would have. Many of us living in the Audubon Community see little need to extend the rail past UB north. AND, research has NOT shown there will be enough ridership to justify the billions of dollars spent or the massive intrusion in our nature oriented community.

We are a community whose inhabitants are invested in the green space we've chosen to live in . The commonality between us is the importance of being connected to a natural environment. We enjoy seeing deer travel through the woods, our backyards, and cross the parkway. We've all walked the Audubon paths and encountered a doe and fawns or a buck with a majestic rack of antlers. What will happen to these important elements of our lifestyle?

It definitely seems that you have already made decisions about and acted upon moving ahead with this project. Where is the equal representation from the community on the NFTA and other metro rail decision making committees or boards? What happened to democracy of the people, for we do not have a vote or voice equal to that of the decision makers. Shame on you for allowing your pocketbooks and that of others rule you, for this is what appears to be underlying the construction of the Metro Rail.

NFTA - RECORD #815 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : Nathanael
Last Name : Nerode
Agency/Affiliation/Business :
State : NY
Zip Code : 14850
Submission Content/Notes :

Looks great. Build it ASAP. Should have been built 50 years ago.

Then build the extension to the airport.

Submission Method : Website

NFTA - RECORD #765 DETAIL

Status : Unread
Record Date : 2/12/2020
Submission Date : 2/12/2020
First Name : Nathanael
Last Name : Nerode
Agency/Affiliation/Business :
State : NY
Zip Code : 14850
Submission Content/Notes :

Build it. Then build the long-planned extension to the airport. This has been delayed too long!

Submission Method : Website

From:

Sent:

To:

Subject:

[REDACTED]
Tuesday, February 25, 2020 1:31 PM

railx

[REDACTED] edward I new jr (OWNER)

I reside [REDACTED] In Amherst ny 14228, this property is located east of john james Audubon pkwy. According to "draft environmental impact study" , this location will be adversely effected by vibration and noise. Please reply on what will specifically be done at this location to avoid both. This area residences are built on clay soil which transmits vibration efficiently. Unless vibration level, based on EIS , isn't greatly reduced, any foundation issues to properties located along Audubon pkwy will be attributed to LTR operating daily. I look forward to your response, thank you Edward New Jr

NFTA - RECORD #783 DETAIL

Status : Unread
Record Date : 2/25/2020
Submission Date : 2/25/2020
First Name : edward
Last Name : new
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

specifically, what corrective actions will be taken to greatly reduce vibration and noise levels for properties located east of Audubon pkwy , between amherst town center and dodge rd. these residence are built on clay soil ,unless vibration levels based on your environmental impact study are not greatly reduced, any foundation issues that incur to these properties will attributed to LTR daily runs.

Submission Method : Website

MR. PETER NICHOLS: My name's Peter Nichols. I live in the Willowridge neighborhood, which is really very close to that Sweet Home spot on your map if you're looking at it. I have several comments that I think really are relevant here.

I really thought this thing should have went out Millersport and directly to the college as opposed to all this turning around.

If you look at this map from the beginning, there's a huge, huge turn right after -- an underground turn, I might add, at the University, another 90-degree turn at Boulevard Mall, a near 90-degree turn at Maple, a near 90-degree at Sweet Home and a more than 90-degree turn between Flint and Lee.

That's five major turns. These vehicles are not going to be able to go very fast through those turns.

It's very problematic and it doesn't make sense when you could have went right out Millersport with virtually no turns. So I mean, that's a problem.

Another problem is when you got to be reducing your lane-age to two; one lane each direction on Niagara Falls Boulevard and one lane in each direction on Maple Road.

Well, already we know the corner of Maple and the Boulevard, when there's rain, that goes underwater.

I mean, I don't know how many -- if you live here, you know it goes underwater, sometimes several feet deep.

Now, if you reduced the land for the water to be disbursed by taking off the corner of Boulevard Mall, you're going to have even more water on that corner and you're going to have it coming down these roads into the corner, so it's possibly going to be even deeper there and more of a problem.

And I mean, if the NFTA is going to do this and cause more problems there, my point is they need to be -- provide remediation there to make that corner more viable.

Furthermore, I mean, it just -- now the idea of going underground at Maple and Sweet Home, that's probably a good idea, except that maybe you should just go underground from the Boulevard all the way there and not cause all the trouble on Maple Road.

I don't know how many of you people actually drive those roads, but I shop there at Wegmans, Tops, Aldi. I go there frequently, go by there on my way to the gym. I mean, there's a lot of traffic there.

If you cut these lanes down to only one in each direction on Maple, for example, and on Sweet Home, which you're apparently going to do between Maple and Sweet Home, I mean, those are real problems.

By the way, I'm not sure where this comes up. Is it going to stay underground underneath the 290 or is it going to share that underpass with the 290?

Not sure. That needs to be addressed more clearly. We don't hear very much about it and in these proposals. It really needs real checking.

So I guess that's really all I really have to say except that -- I mean, I would like us to have more rapid rail. That's a good thing. But maybe this isn't the right route. Thank you.

Comments

Please provide your comments on the Draft Environmental Impact Statement.

I DON'T FEEL THIS ROUTE IS JUSTIFIABLE FOR THESE STREETS. IT SHOULD RUN STRAIGHT DOWN BAILEY AVE UNDERGROUND & COME UP BETWEEN SHERIDAN & EGGERT. YOU CAN HAVE HAVE STATION RIGHT THERE FOR THE NEW PLAZA BEING BUILT @ N-TOWN.

THERE COULD BE A STOP @ BAILEY/GROVE CLEVELAND ALSO. ONLY ABOVE GROUND IT COULD RUN TO MAPLE & ON TO UB. THERE WOULD BE MORE RIDERS THAT WAY & (MAY??) BE MORE ART TO TAKE IN MORE \$ & RIDERS.

PUTTING IT DOWN THE MIDDLE OF NFB FROM KENILWORTH TO EGGERT IS TOTALLY IRRESPONSIBLE!! THAT'S RIGHT THRU THE NARROWEST PART OF CURRENT ROADWAY. THE LEFT TURNS GOING SBOUND/NBOUND WOULD BE CUT OFF @ MOST INTERSECTIONS, CAUSING CARS TO HAVE TO GO DOWN 2-3 BLOCKS TO MAKE A U-TURN! NOT BEST FOR TRAFFIC!!

ALSO EMERGENCY VEHICLES WILL BE SLOWED UP IN REACHING A RESIDENCE, BECAUSE THEY TOO WOULD HAVE TO DO THIS, & ARE MUCH LARGER!

TAKE ANOTHER LOOK & DO THIS RIGHT! MOVE IT TO BAILEY AVE.

Comment Submission Deadline: 4:00pm on March 24, 2020

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: _____

Address: _____

Email: _____

Phone Number: _____

Affiliation (if applicable): _____

Have more to say?

mail us at railx@nfta.com



NFTA - RECORD #824 DETAIL

Status : Unread
Record Date : 3/23/2020
Submission Date : 3/23/2020
First Name : Robert
Last Name : OKeefe
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

I am a Business property owner on Niagara Falls Blvd. and have many concerns about the project, they are as follows:

1. The reduction of lanes from the present 4 lanes plus the turning lane to one lane each direction.
2. The aquisition of property along the BLVD. on each side. At present there is not enough space in my parking lot for cars to maneuver anything less would make the lot unusable.
3. Snow removal at present the the snow from 2 1/2 lanes is deposited into an area that is 3 feet wide. With this are gone snow would be deposited in the lot.
4. The amount of riders, I only see 2 or 3 riders picked up daily from the stop on our corner. Its seems to be an enormous expense for so few riders.
5. Raised Rail, with the raised rail the ability to make left hand turns would be very limited. Access to homes and business would be very restricted.
6. Past Performance, when the rail closed down traffic on Main St. it also closed down the businesses.
7. Emergency Traffic, the Blvd. is the main access route for emergency traffic with no left hand turn and one lane would limit access creating longer response times.
- 8 Emergency Traffic, winter operations in some instances when the volume of snow is high the side streets are not wide enough for emergency traffic and must use the Blvd.
9. With the reduction of lanes on the Blvd. it would push some of the traffic to the side streets during peak times.
10. Pedestrian traffic, there are many school children that pass through this area to get to the school buss stop limiting the area between the parking lots and roadway would be more congested and less visible.

Suggestions:

1. Put the rail under ground all the way to Th Blvd Mall.
2. Single rail at grade level like Toronto has.
3. Temporarily block off the traffic lanes on the Blvd. at peak times of day and year to simulate your plans to evaluate there effectiveness.

Submission Method : Website

NFTA - RECORD #748 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Susan
Last Name : O'Rourke
Agency/Affiliation/Business :
State : NY
Zip Code : 14260
Submission Content/Notes :

Please bring the light rail to UB!
Submission Method : Website

NFTA - RECORD #752 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Ketankumar
Last Name : Patel
Agency/Affiliation/Business :
State : NY
Zip Code : 14201
Submission Content/Notes :

Metro extension will be very helpful to so many people like me who travel a lot from downtown to North campus. It will help reduce so much traffic and travel time, so good environment, good for people.

Submission Method : Website

MS. ANNE PEPI: Anne Pepi, P-E-P-I. My affiliation is that I work on Niagara Falls Boulevard.

And my concerns are the fact that I've heard that the train is going to be raised up four inches so there won't be a left being able to be made on the Boulevard, which is going to be a problem for all of the businesses, all of the houses that are on the Boulevard.

They said that they were looking at Tempe, Arizona as one of their guidelines as to how they decided to put this train in. In Tempe, Arizona, which I was just there last week, they have -- the train is flat. You can make a left into any business that you want to. They have all of the parameters set up so you know if there's a train coming.

This is a problem for where I work because it comes up at Kenilworth and I work just past that.

So we are going to have a problem with my business where I work and cars into our parking lot. So this is a big concern. It is a big project.

I don't know if it's necessary or not because if you have one lane going north and one lane going south, where are all the cars going to go?

Was there any provisions made for Bailey Avenue or Parker Boulevard for all of the traffic that's going to go there instead because they're not going to be able to use the Boulevard?

I'm also hoping that they took a look at what happened with Main Street in Buffalo when they put the train through there.

And my concern with that is they closed all those businesses. How many businesses are they going to close with Niagara Falls Boulevard without enough places for the cars?

I think they said they were going to have a hundred people a day on these trains. A hundred people a day to go 44 minutes from top to bottom of the train when you can go the 990, 290 downtown in 15 minutes. Thank you.

NFTA - RECORD #760 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name :
Last Name : Perini
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

I'm against the extension of the light rail to UB North Campus. It is easy enough to take a bus to south if you need the light rail. Previous light rail projects have produced typical corruption, price overages on construction, and unsustainable maintenance costs.

Submission Method : Website

NFTA - RECORD #802 DETAIL

Status : Unread
Record Date : 3/2/2020
Submission Date : 3/2/2020
First Name : E
Last Name : Pond
Agency/Affiliation/Business :
State : NY
Zip Code : 14068
Submission Content/Notes :

While I see the advantages of having an efficient transportation system connecting the two campuses of University of Buffalo, I am not sure this is the solution. Having an above ground rail dividing Niagara Falls Blvd., Maple, and Sweet Home Roads seems like a poor design. These roads are busy and restricting traffic does not seem like a workable solution.

The twists and turns of the proposed rail needed to make this route work seems unlikely to make this a smooth ride, nor does it seem like it will let the trains reach maximum speeds.

I mostly am concerned by the extension of the rail past UB along John James Audubon in the Getzville area. I am concerned with the changes this will make environmentally as green space is used to create the turn around and overnight storage by the 990. I also don't see who will ride this extra link. While it may seem like it will increase ridership to the police station, library, and senior center, or to jobs in the nearby business park, I can not picture most people walking the distance from the rail to the senior center or jobs in the business park without side walks. This is not currently a walkable neighborhood.

Submission Method : Website

This project will take years to develop - obstacles

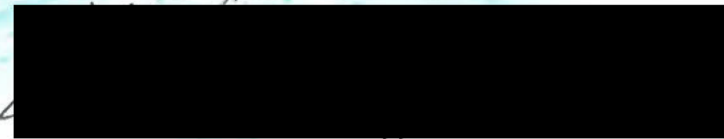
- 1) houses
- 2) sewers
- 3) traffic
- 4) weather
- 5) costs

I would project that with structure costs development meeting I cannot see this happening in the next 20 yrs. The length of time will be years. Why not a rail system above ground like the St. Cars years ago like parts of the above ground sections down town with designated rights on & off its modern & would be less costly and could

branch out in many directions & eliminate buses. More modern easier to maintain & eliminate the underground mess - we see to get on etc.

Thanks if you use if suggestions.

Sei Protes



NFTA - RECORD #814 DETAIL

Status : Unread
Record Date : 3/9/2020
Submission Date : 3/9/2020
First Name : Jamey
Last Name : Quiram
Agency/Affiliation/Business :
State : NY
Zip Code : 14201
Submission Content/Notes :

Route looks okay but it appears to be a long trip. Eliminate one stop on North Campus and save money and time.

Submission Method : Website

From: [REDACTED]
Sent: Tuesday, February 25, 2020 5:51 PM
To: railx
Subject: rail expansion to the northtowns

Categories: Blue Category

I have lived on [REDACTED] for 60 years and am very concerned about the expansion of above ground rail on Niagara Falls Blvd. The traffic on the Blvd, especially between Eggert rd and Brighton rd. is very busy as anyone can see. As a resident of the area I am strongly against adding above ground rail to the heavy mix of traffic. Any rail in this area should be built below ground. I understand the reason for installing rail above ground is the added cost to build under ground. I understand the cost issue however, it will be at the inconvenience and safety of town residents. If you cannot afford to build the rail below the ground I suggest you wait with the installation until you have the necessary funds to build it under ground. Thank you Alan J. Rebman

NFTA - RECORD #749 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Tina
Last Name : Reed
Agency/Affiliation/Business :
State : NY
Zip Code : 14127
Submission Content/Notes :

I am in favor of extending metro rail from UB's south campus through north campus, but with a few conditions:

- it does not disrupt current residents in the proposed path
- funding the project does not fall on the public
- all concerns of individuals who think they will be negatively impacted by the extension are carefully considered and decisions are made with these concerns in mind.

Submission Method : Website

NFTA - RECORD #735 DETAIL

Status : Unread
Record Date : 1/27/2020
Submission Date : 1/27/2020
First Name : karen
Last Name : reichert
Agency/Affiliation/Business :
State : NY
Zip Code : 14226
Submission Content/Notes :

There should be public hearings in the evening or on the weekend. The working public that is directly impacted by this generally would not be able to attend at 1 pm or even 5pm.

Submission Method : Website

NFTA - RECORD #803 DETAIL

Status : Unread
Record Date : 3/4/2020
Submission Date : 3/4/2020
First Name : Richard
Last Name : Ridenour
Agency/Affiliation/Business :
State : NY
Zip Code : 14213-1445
Submission Content/Notes :

I am in strong support of the proposal to extend Metro Rail service to UB's North Campus and beyond.

Submission Method : Website

NFTA - RECORD #736 DETAIL

Status : Unread
Record Date : 2/5/2020
Submission Date : 2/5/2020
First Name : Sara
Last Name : Robinson
Agency/Affiliation/Business :
State : NY
Zip Code : 14216
Submission Content/Notes :

I support this plan to extend the metro rail line. I live in the North Buffalo area, work at UB South Campus, and am a UB student taking classes on North Campus. Having access to a reliable source of transportation between campuses would help eliminate any needs I have of commuting by car, when the busses are not running as frequently. Further, I believe this would assist those in the Amherst area to access Buffalo more easily, generating greater patronage of the city area. I believe this as I have family in these areas that have to drive to access the metro rail in its current form. This is a smart idea for this region.

Submission Method : Website

From: Dave Sampson [REDACTED]
Sent: Monday, March 9, 2020 1:38 PM
To: railx
Subject: NFTA Metro Rail Expansion DEIS Comment

Good afternoon,

I attended the NFTA Extension DEIS presentation at Sweet Home Middle School two weeks ago.

First of all, I want to apologize to the NFTA staff and the attendees for the impolite behavior of some of those in attendance. The interruptions and shouting from the audience was embarrassing.

I want to express my general support for the Metro Rail expansion along the Niagara Falls Blvd. corridor. As a resident [REDACTED] in Amherst [REDACTED] I am looking forward to access to the light rail so close to my home.

I am concerned with the plans to have the Metro Rail enter above ground in the section near Kenilworth Ave in the Town of Tonawanda. This is the narrowest section of NF Blvd with a concentration of residences on both sides of the Blvd.

I suspect the cost-effectiveness of continuing the underground portion to the section nearer Eggert Road is quite prohibitive.

Kenilworth F.D.'s concern about access for fire equipment is quite justified as well.

All in all the presentation was very informative but quite "dry".

The information contained on the screen graphics were not very engaging or creative enough to grab the attention of the audience. The presenter was very knowledgeable but "dry" as well.

I recognize the seriousness of the data and the plans however, there is an element of salesmanship lacking which may be helpful in creating more excitement and buy-in from the public.

Thanks for listening.

Dave Sampson
[REDACTED]

NFTA - RECORD #817 DETAIL

Status : Unread
Record Date : 3/11/2020
Submission Date : 3/11/2020
First Name : David
Last Name : Sawran
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

I moved to the Buffalo area in 1992 in order to attend the University at Buffalo. I had very little money and did not own a vehicle. Many of my fellow classmates were in very similar situations. A large number of my classmates were from the New York City area, and were accustomed to relying on a well established public transit system. Many of them did not even have a drivers license, much less access to a car. Back in those days, it was a real shame that it was as complicated as it was to be able to travel around the greater Buffalo area. It seemed absolutely ridiculous that the rail line did not extend up to the UB North Campus. Even then, it seemed like an OBVIOUS NECESSITY for the area.

Even to this day, when I have occasion to head to downtown Buffalo, I will often park my car at the UB South Campus and ride the metrorail. It's just simpler and easier than dealing with traffic. However, if the rail line was extended, and was easier to get to, I'd be even MORE inclined to ride it more often. I'd likely attend more events and patronize more businesses in Downtown Buffalo.

I am quite sure that, as a former UB student, that MOST UB students would ride the rail line. Many will visit downtown A LOT more. NFTA will make A LOT more money. The University at Buffalo will benefit. The greater Buffalo area will benefit. The residents of the greater Buffalo area will benefit. The students at the University will benefit. And I believe that, if the rail is extended, it will be more likely that the rail lines will be FURTHER extended to other areas in the region. Another line that extended out to the Buffalo/Niagara Airport would be another GREAT idea, which would surely bring great benefits all around.

I, for one, believe that this proposed expansion is FAR overdue. This expansion should have been done MANY DECADES AGO... LONG before I ever even arrived in the area. I believe that the failure to GREATLY expand the rail lines has even contributed to the decline of the greater Buffalo area.

I, for one, am 100% in favor of this expansion. I believe that this project is the BARE MINIMUM of what should be done. If it were up to me, this project would have been completed back in the 1970s!

Let's get this expansion underway and completed as soon as possible. The benefits FAR outweigh any downsides. Let's do whatever is necessary to get this done.

Submission Method : Website

From: Dennis Schaeffer [REDACTED]
Sent: Thursday, February 13, 2020 9:52 AM
To: railx
Subject: Comment re rail expansion

Hello.

I have been a regular user of the NFTA's metro rail since 1999. I generally commute to and from work via the NFTA metro rail.

I have two questions/concerns and I apologize for not having the time to pore over the draft EIS.

(1) It would be best to avoid the use of tunnels, to the extent practicable. I don't think that the additional costs associated with creating tunnels would be justified by the system created and the usage of the same.

(2) I saw in the executive summary that the estimated travel time from I-990 to University Station would be ~21 minutes. If we were to add another ~15 minutes to get downtown from University, are we confident that the total travel time (including the use of a park and ride at the I-990 station, catching a train on time) would persuade suburban and ex-urban riders to use the extended metro rail for a round-trip commute? If such a commuter is approaching the start/end of I-990, he or she is ~30 minutes from downtown (traffic permitting). Will such commuters choose to park and catch a train, and thereby arrive downtown ~15-20 minutes later than they might otherwise? I have my doubts, but would be glad to see solid data proving that the support is there.

Thanks.

-

Dennis Schaeffer

Resident of City of Buffalo (14214)

NFTA - RECORD #786 DETAIL

Status : Unread
Record Date : 2/25/2020
Submission Date : 2/25/2020
First Name : Gary
Last Name : Schaut
Agency/Affiliation/Business :
State : NY
Zip Code : 14226
Submission Content/Notes :

Request the Peanut Line Bike Trail be paved in your Master Plan

Submission Method : Website

NFTA - RECORD #796 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : Paul
Last Name : Schimert
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

We live on [REDACTED] and our backyard backs up to the Audubon. My wife Kerri and I bought our house nearly 20 years ago because of the quiet green space with trails for walking and hiking. It is our home where we raised our 4 children. Our house is a structure that we rebuilt room by room from the roof to the basement. However, our home is where our memories exist. Our home is where our reflection on our life takes place. We reflect on what we did right and where we went wrong and how we could have done it differently or how happy we were to choose to stay on [REDACTED]. We walked our three dogs for years and years all throughout our placid slice of American Pie in the rain, the snow, and the sunshine. We see the deer, fox, turkey, geese, ducks, skunks, raccoons, cardinals, and even turkey vultures from time to time. It is all apart of our home. The morning walks to the children's bus stop, the hanging of the Christmas Lights, the October Storm, and the raking of the autumn leaves helped to transition our house into a home. However, none of this matters to the NFTA. It is an unaccountable Goliath of an entity in which our quiet corner of the world will be unable to stop its intrusion. The grass roots organizations that speak in favor of the light rail expansion and absurdly make the argument about how wonderful a project it will be for our community. They further insult us by claiming the train running through our backyards will raise our property values. I don't think so. Nobody wants a train running through their backyard for any reason. It it doesn't matter to them because we are a too few and they are too many. The politicians who appoint the Executive team of the NFTA are not concerned about a handful of homeowners whose domestic serenity will be permanently altered for all the rest of their days. One can only hope that someone from one of those Citizen Grass Roots organization will be eager to come and put an offer on our house and enjoy using the train as their new home increases in value with each passing day and the noise produced is gently dampen by the new growing vegetation. Is it possible that one of those Citizen Grassroots organizations in favor of the expansion will gladly move to [REDACTED] and create a home with their new train and fill it with memories that will last all the days of their lives. I'll gladly sell them my house at its current value prior to construction of the rail expansion or better yet Executive Director Kimberley Minkel can relocate to our house on [REDACTED]. She can sit upon our newly constructed 500 square foot back deck that is currently being used to enjoy quiet mornings, breezy afternoons, and evening sunsets. If she hurry's to buy our house she will be able to enjoy all these things before the train starts to run by every 12 minutes for 18 hours a day. However, I don't we will hear from any of the proponents of this NFTA project anytime soon.

Paul and Kerri Schimert
Homeowners
[REDACTED]

Submission Method : Website

NFTA - RECORD #751 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Janet
Last Name : Schrum
Agency/Affiliation/Business :
State : NY
Zip Code : 14260
Submission Content/Notes :

I support the Metro Rail Expansion initiative. It is essential that one of Buffalo's largest employers and host to 30,000 students be easily and affordably accessible.

Submission Method : Website

NFTA - RECORD #754 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name : Daniel
Last Name : Schweitzer
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

As a transplant to Buffalo who has made it my home, I am tremendously excited for the potential this expansion will unlock in the region. In addition to being safer and vastly more environmentally friendly than the area presently is, the economic growth this is sure to create will continue carrying Buffalo forward into the 21st Century.

Submission Method : Website

MR. SCOTT: Hello. I'm Wayne Scott. My wife and I live in the Audubon area near the 990 and just wanted to kind of state that we looked at the report and we have some obvious concerns about the quality of life that this will impact.

We were obviously concerned a little bit about the quality of life that this will have impact-wise on the residents in the Audubon area in particular through that section that's obviously highlighted in the report. We're also wondering why, what the validity and the feasibility of the Park and Ride is at the end of the 990 and who is going to use it and if there is student housing. If those are the two main reasons, it seems like it's a lot cheaper to provide a few more shuttles to U.B.

We never had anybody come and ask us anything on a survey. There has been all these hypothetical surveys that people will use this and that and that this thing will be feasible, but we would suggest that you do actual surveys.

Go door to door and ask the residents of the area, ask businesses from the area or surrounding people in the neighborhood and surrounding towns whether they will actually use this and if it makes any sense.

If you're going to come to the 990, get out in a Park and Ride, we've got 45 minutes to an hour to get downtown. Does that make any sense to anybody? Does it? After you do it once or twice, are you going to say why would I just not continue to drive downtown and take 20 minutes to get downtown?

So that's the concern of us and whether it makes any sense beyond the north campus to provide this rail. What is the feasibility beyond the north campus and what is the usability and that's where we think we should -- something should be done further, do a survey and provide better input if you're going to spend millions and millions of dollars on a section of railway that we don't really think is feasible and usable and obviously dramatically changes the quality of life and character of the Audubon area. So that's it.

From: Michele Simmons [REDACTED]
Sent: Tuesday, March 17, 2020 10:00 PM
To: railx
Subject: Metro rail expansion

Absolutely ridiculous! There are busses fall6apart, breaking down, weekly!, that I'm aware of, imagine how many I don't? Reliable drivers? That'd be nice. Underground? Where you don't know where you are when the auto voice isn't working? Again, weekly occurrence....the driver doesn't tell you where you are, so it's a guessing game. Rude, nasty, drivers are the norm....maybe spend a little more \$ concentrating on good employees so the current customers can be somewhat satisfied before creating a whole new group of ticked off passengers. Plan sounds pretty, until reality strikes and it just increases the already non friendly way of transportation it is.

February 29, 2020

Dear NFTA,

Concerning plans to extend the light rail line to the North Campus and beyond, on February 14th I offered the comments below. One of them was about rail cars to be used. Something like this modern articulated car in use in Maryland would be appropriate. Note attractive purple livery too.

Sincerely,

Walter Simpson



My February 14 2020 Comments

1. Please do not over-estimate the number of people who will use this line, Right now, the area between south station and UB north campus is a ghost town in terms of potential transit riders. And don't assume UB students will want to en mass to ride downtown. There will be some very modest back and forth to the new medical school but that is it. Nor will there be many UB students on North or South Campus for four months of the year. They go home over Christmas Break and the entire summer.
2. Given the above, don't let UB define this line. It will be a disaster if you do. They should not be setting terms.
3. Please do not use the existing old ugly clunky oversized LRVs on this extension. Very inappropriate! You need something modern and smaller like the beautiful new trolleys and smaller LRVs used by other cities.
4. It is OK if people change trains at south station if train schedules are coordinated.
5. Change the livery (painting scheme) on then new and old cars to something colorful and vibrant.
6. Design for a light weight catenary systems to keep costs down. Years agos the Milwaukee Road railroad electrified hundreds of miles of track out West and they did it with a light weight trolley line, not a massive system line Buffalo's LRV. Also consider that even the French TGV uses what appears to be a much more light-weight catenary system than the one Buffalo's LRVs use downtown.

NFTA - RECORD #794 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : Robert
Last Name : Simpson
Agency/Affiliation/Business :
State : NY
Zip Code : 14051
Submission Content/Notes :

NFTA needs to put a paved path on the Expansion plan.

Submission Method : Website

NFTA - RECORD #774 DETAIL

Status : Unread
Record Date : 2/14/2020
Submission Date : 2/14/2020
First Name : Walter
Last Name : Simpson
Agency/Affiliation/Business :
State : NY
Zip Code : 14226-3528
Submission Content/Notes :

1. Please do not over-estimate the number of people who will use this line, Right now, the area between south station and UB north campus is a ghost town in terms of potential transit riders. And don't assume UB students will want to en mass to ride downtown. There will be some very modest back and forth to the new medical school but that is it. Nor will there be many UB students on North or South Campus for four months of the year. They go home over Christmas Break and the entire summer.
2. Given the above, don't let UB define this line. It will be a disaster if you do. They should not be setting terms.
3. Please do not use the existing old ugly clunky oversized LRVs on this extension. Very inappropriate! You need something modern and smaller like the beautiful new trolleys and smaller LRVs used by other cities.
4. It is OK if people change trains at south station if train schedules are coordinated.
5. Change the livery (painting scheme) on then new and old cars to something colorful and vibrant.
6. Design for a light weight catenary systems to keep costs down. Years agos the Milwaukee Road railroad electrified hundreds of miles of track out West and they did it with a light weight trolley line, not a massive system line Buffalo's LRV. Also consider that even the French TGV uses what appears to be a much more light-weight catenary system than the one Buffalo's LRVs use downtown.

Submission Method : Website

MR. STEINBERG: Who lives on the Boulevard? Who is from Audubon? There you go.

My name is Steve Steinberg,

S-t-e-i-n-b-e-r-g. I live off of Sweet Home and I can tell you that this here is nothing but a manifesto, okay, for U.B. to push out into the surrounding neighborhood. This is Metro Rail's Mein Kampf, that's what it is, and there is one name on it. It's your name. You're the one pushing this through.

This thing is nothing but an opportunity and all its little studies and everything like that to figure out a way to push us further and further from our homes little by little and this has been going on for over the fifty years that U.B. has been there.

I happen to be in the area west of Sweet Home. They wanted to turn my street into a four lane connector between Niagara Falls Boulevard and north campus and they got stopped 50 years ago and U.B. is still irritated about it, because they're still pushing off the west edge of their campus. They haven't given up. Little by little they're still moving, inch by inch and Audubon, you're next. They're not going to quit. They plan on being there as long as they need to to make our lives as difficult as it needs to be until we move or we stay and if you stay, you're going to be sorry.

You're not going to get what you earned, what you paid, your down payment on your home, when you paid your mortgage, when you paid your insurance because you're not a developer.

They don't care about you. They want you out and the sooner this train comes through, the better. They're determined to finish that cutting off from the rest of Amherst. They did it with the 990 halfway and they're going to finish it off with this little choo choo train urban center.

That's all they want out of you. They only want your land and if you really want to see the truth about it, read their book, read this thing and tell her how you feel about it. Her name is on it.

Do I need the whole three minutes? What do you think? Are we going to let them do it? Let's hear it. Come on, louder. I want everyone to say it to the camera.

MR. DAVID STINNER: Hello. My name is David Stinner, S-T-I-N-N-E-R. I'm a resident of the Town of Tonawanda and I operate two businesses on Niagara Falls Boulevard near the corner of Sheridan Drive.

I am actually very excited about this project. I am a forward and future thinking person. I have five children.

I want my five children to stay in this region as I hear a lot of people who are older than me say they've lost their children to move to other cities.

I don't tend to look back at the future very often, but I remember when I was a child at the people who were complaining about the businesses that closed downtown during construction.

And I would like to bring up for the record the observation that I have made that in Rochester, a similar size city, retail at the time in the 1980s left downtown Rochester, just like it left downtown Buffalo.

It came to places like the Boulevard Mall right here. So I don't think that rail did that. I think that happens either way.

If you -- from my perspective, if you look at the future of the Buffalo region today, it looks much different than what I would have thought in 2010, ten years ago.

And I'm very interested in seeing Buffalo as a region becoming a world class location and, again, keeping my children in this region.

When people want to leave the area, they're looking for high-tech jobs, different type of jobs in the future. And I know businesses, like when we saw the Amazon competition, they looked for rail projects for high density development.

When I travel to other cities the size of Buffalo and larger, I see a lot of development that happens around rail stations.

I don't see how this can be a bad thing. I think that the development that happens around rail stations is actually quite exciting.

I think a lot of us know that the University at Buffalo brings a lot of international and downstate students to our region.

And I think trying to keep those students to be entrepreneurs and to create new businesses is something that we want in this region.

I recently read some data in Buffalo Business First that said we have a lack of entrepreneurship and lack of college educated students staying in this region.

So again, I'm going to put my comments in that we want to have a world class region for people to pick our region and stay here. And lastly, I'd like to note that I hear a lot about climate change. I think regions like Buffalo are going to be the place in the future where people want to move to.

Because other places are going to be underwater, they're not going to have fresh water, they're going to have lots of fires.

So preparing our region for the future, I see this as a great project.



KENILWORTH FIRE DISTRICT No. 2

TOWN OF TONAWANDA
84 HAWTHORNE AVENUE
BUFFALO, NEW YORK 14223
Phone/Fax 716-834-1007

February 19, 2020

To Whom it May Concern,

The Kenilworth Fire District No. 2 would like to officially go on record about our concern with the NFTA Metro Rail Expansion Project. The Fire District does not take an official position for or against the proposed project but does have very serious concerns about it and how it would affect our mission in providing emergency services to the tax payers and residents of the Kenilworth Fire District No. 2 and our mutual aid requirements with surrounding Fire Districts.

Our first concern with this project is in regards to the portal at Kenilworth and Niagara Falls Blvd. This intersection is a major access point for our responding fire apparatus from our Fire Hall at 84 Hawthorne Ave., Town of Tonawanda, NY 14223 and the majority of the rest of our fire district. Additionally, reducing Niagara Falls Blvd. down to one lane in each direction creates a major concern to us in regards to our response time and ability of other necessary 1st responders to protect and serve the public when an emergency occurs. This also will affect all of our volunteer members on responding to the Fire Hall in trying to get Fire Apparatus out during an emergency situation.

We are requesting not only official notification, but sit-down meetings with planners, stakeholders and all necessary politicians to discuss how this NFTA Metro Rail Expansion is going to address these concerns. We feel that all emergency responders that will be affected should have the right to these meeting and address these concerns with everyone involved because it affects all our taxpayers and residents, who we all swore to protect and serve to the best of our abilities. Politicians provide additional voices for the taxpayers of those they serve and are best to disseminate the information provided to the public at large. Furthermore, they also oversee Police, Paramedic and other public services that will be affected by your planning and decision making.

We await your response and look forward to working with you in addressing these concerns for the taxpayers, residents and all mutual aid emergency service providers being affected by the NFTA Metro Rail Expansion. Additionally, we look forward to working hand in hand with your organization to increase the safety and well-being of the surrounding community.

Sincerely yours,
Board of Fire Commissioners
Kenilworth Fire District No. 2

Joshua L. Strauss
Joshua L. Strauss
Fire District Secretary

NFTA - RECORD #759 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name : Sharon
Last Name : Sullivan
Agency/Affiliation/Business :
State : NY
Zip Code : 14217
Submission Content/Notes :

I fully support extending the metro line to the North Campus. It was a shame that it wasn't done in the 80's. A metro rail that only serves a portion of the city is and has been worthless.

It is only with the building of the Jacobs school that the metro has made any sense.

I would also hope consideration is given to providing rail service from the airport to downtown. Nearly every city offers easy, affordable rail transportation to their downtown areas. Why not Buffalo?

It's time to start making informed, smart decisions in Buffalo regarding public transportation. Let's make this a city that makes having a car obsolete!

Submission Method : Website

NFTA - RECORD #746 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : John
Last Name : T.
Agency/Affiliation/Business :
State : NY
Zip Code : 14072
Submission Content/Notes :

I don't feel this is a good idea at all. This is going to bring too many people to this already busy area. Over time, homeless and other "questionable" people will start riding these rails and spreading into the more suburban area of Amherst/Tonawanda. I use to live in Amherst, and I was against it the moment I heard about it. I'm sure the rails will be used, but like everything else in Buffalo, eventually it will become a rundown reminder of why it shouldn't have been approved in the first place. We don't need this kind of "growth" in Western New York.

Submission Method : Website

MS. TAYLOR: My name is Karen Taylor. I live in the Audubon neighborhood. So I am here to say if you want to do this big boondoggle, that's fine, but let's stop it at U.B. north. There is no reason for it to go from U.B. north to the 990. By your numbers, it will have 100 riders per day. I don't want my tax dollars spent on 100 riders per day as proposed. Have them do a bus service. Stop it at U.B. north. Do a bus service to the I 990 for the 100 supposed riders and if anyone has read this, the numbers are fake.

Synthetic method. You know, I have a Master's. I never learned about that technique, but anyways, I got off plan.

So living right across from where the train will be on John James Audubon, my house will be affected by vibration, by noise pollution. If we're talking about the environmental impacts, you by your own standards say that it's severe. So you found it severe, doesn't that mean you should make some changes? My house will be under severe impact of noise and vibration.

My neighbors have foundation issues. Who is going to do something about that? I really would like to know what residential homes are part of this acquisition. You had 69 homes that were affected. I would love to know, are you buying my house? How much? I'm kind of curious. I would love to know the residential acquisition of homes, that would be interesting. Why vegetation? A nice plant in front of my house is going to stop the vibration and the noise pollution? I have lived in Florida, I have lived in places where they do things like they put up walls, cement walls. That's what stops noise and vibrations. Why aren't we even considering that? No, just vegetation. All right.

So in summary, I don't want the train to go past U.B. north. Oh, 44 minutes, that's how long it's going to take if you do Park and Ride at the 990.

Do you know how long it takes me to get downtown, 15 minutes in my car. I used to live in San Francisco. That's why I took public transportation. I couldn't park, I couldn't get there easily.

In Buffalo, we don't have a problem. We can drive everywhere from the 990 in 15 minutes. Why are we going to take a train, pay and take 44 minutes. It doesn't make sense. I don't want my tax dollars spent that way. I don't know if you do, but all right. What else? That might be my point. I'm sure there is more.

Please don't spend the tax dollars on this and just stop it at U.B. north.

NFTA - RECORD #787 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : shawn
Last Name : taylor
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

If the train runs past UB North, which it shouldn't...

Why wouldn't you place the train on the south bound lanes of JJ Audubon? That would help with the noise and vibration affecting the neighboring homes.

Why wouldn't you place a cement wall along the JJAudubon neighborhood? That again would help w the noise. The report states vegetation would be planted. That isn't going to help the homeowners with the noise pollution.

Have you researched the vibration and the sinking foundations of the homes along JJ Audubon? Can you guarantee our homes won't have worsening foundation problems?

How can you justify running the train past UB North campus with only 100 riders a day? I don't want my tax dollars used to run the train north of UB North campus. I would encourage NFTA to stop the train at UB North campus.

Submission Method : Website

NFTA - RECORD #781 DETAIL

Status : Unread
Record Date : 2/20/2020
Submission Date : 2/20/2020
First Name : karen
Last Name : taylor
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

I would like to voice my concern against the train going past UB north to 990. As a member of the Audubon community and a tax payer I would like propose that the train should end at UB north. It doesn't make any sense to pay for this train to go past UB north. There will not be enough riders to warrant the cost of that part of the expansion. The Audubon community does not want this train in our neighborhood.

Per the NFTA report there will be a negative environmental impact of the train in our community...

Found under: Vibration - 15.5.3

Audubon will be in the adverse impact zone.

The general ground-borne noise analysis predicted exceedances of the FTA thresholds, indicating the potential for adverse ground borne noise impacts, at the following:

- Residences along the east side John James Audubon Parkway between Dodge Road and the Amherst Police Station within 160 feet of at-grade track.

Submission Method : Website

NFTA - RECORD #737 DETAIL

Status : Unread
Record Date : 2/5/2020
Submission Date : 2/5/2020
First Name : Letitia
Last Name : Thomas
Agency/Affiliation/Business :
State : NY
Zip Code : 14226
Submission Content/Notes :

It's time that light rail be extended to the UB North Campus. The system would be utilized by not only students, but faculty and staff. With 30,000 students and 14,000 employees, think of the impact light rail transportation could make in WNY! We would lessen our carbon footprint and efficiently move thousands of people to and from work and school. If our region is going to expand and grow, we must take progressive steps like this. It's time.

Submission Method : Website

NFTA - RECORD #739 DETAIL

Status : Unread
Record Date : 2/5/2020
Submission Date : 2/5/2020
First Name : John
Last Name : Tooley
Agency/Affiliation/Business :
State : NY
Zip Code : 14217
Submission Content/Notes :

Enthusiastically support the extension of Metro Rail. While much attention has been paid to connecting the UB campuses and reaching deeper into the suburbs, there is also a great opportunity to re-imagine the area around Boulevard Mall where traditional retail is collapsing and transit-oriented development could fill many of the coming gaps in that corridor.

Submission Method : Website

NFTA - RECORD #743 DETAIL

Status : Unread
Record Date : 2/10/2020
Submission Date : 2/10/2020
First Name : Katie
Last Name : Tudini
Agency/Affiliation/Business :
State : NY
Zip Code : 14169
Submission Content/Notes :

I work in Amherst and I strongly support the case for extending the metro north. There are so many reasons why this is needed but most significant is the enormous reduction in greenhouse gases due to the conversion of 180 million trips from fossil-fuel based buses to our clean, locally produced hydropower light rail. Buffalo is growing and we need to address the transportation situation

Submission Method : Website

NFTA - RECORD #770 DETAIL

Status : Unread
Record Date : 2/13/2020
Submission Date : 2/13/2020
First Name : Susan
Last Name : Udin
Agency/Affiliation/Business :
State : NY
Zip Code : 14214

Submission Content/Notes :

I support the extension of Metro Rail to the UB North Campus. This extension will save many, many car trips, will allow easy access for to shopping and UB events to people without cars, and will at last tie the 3 UB campuses together. UB students, currently stranded on the north campus, will have easy access to the city and to the revitalized Boulevard Mall and other nearby commercial enterprises.

Submission Method : Website

Attachments : 770_ Udin_Website_Original.pdf (59 kb)

NFTA - RECORD #770 DETAIL

Status : Unread
Record Date : 2/13/2020
Submission Date : 2/13/2020
First Name : Susan
Last Name : Udin
Agency/Affiliation/Business :
State : NY
Zip Code : 14214
Submission Content/Notes :

I support the extension of Metro Rail to the UB North Campus. This extension will save many, many car trips, will allow easy access for to shopping and UB events to people without cars, and will at last tie the 3 UB campuses together. UB students, currently stranded on the north campus, will have easy access to the city and to the revitalized Boulevard Mall and other nearby commercial enterprises.

Submission Method : Website

NFTA - RECORD #800 DETAIL

Status : Unread
Record Date : 2/27/2020
Submission Date : 2/27/2020
First Name :
Last Name : Voter
Agency/Affiliation/Business :
State : NY
Zip Code : 14228
Submission Content/Notes :

What a waste of Tax payer money. The report glosses over the impact to the community to meet the needs of developers. With all the other transportation needs of the area, this is the best plan. I find it amazing that the subway light rail that will cut through my neighborhood ends at property owned by CIMINELLI MUIR WOODS LLC. Well Ciminelli will certainly benefit. I will exercise to vote at the ballot box, and hope the federal government will come in and stop the corruption.

Submission Method : Website

Leigh Waterman, L-E-I-G-H W-A-T-E-R-M-A-N. I also thought this was going to be a question and answer session. I would encourage the NFTA to actually put one together for a public hearing, but I do have some comments here.

I might not be in the majority of this room, but I am pro the project, but I do have some concerns. The gentleman in the black jacket mentioned several along Niagara Falls Boulevard, garbage, how we're going to get out of our properties. Everything he mentioned, I would double.

The biggest concern is that the previous location was moved due to sound concerns from adjacent properties at the top and that was actually mostly in a commercial area. It was as you went south you did hit residences.

I live 200 feet from the proposed new exits at Niagara Falls Boulevard and Kenmore Avenue area. The sound study is flawed. It says there is only a one decibel increase from 70 to 71 and I'm an architect.

I deal with sounds all the time and it just doesn't make sense, because you go on reading the study and you have an 85 decibel horn being used when you're coming out of the tunnel. So 85 decibels in no way, shape or form in any circumstances becomes 71 decibels. That's multiple horn sounds every six minutes. So I would like to see some steps taken to mitigate that.

You were already talking about slowing speeds north of U.B. and something like that should be done in that location.

Another concern I have is having lived in cities near where the Metro comes out from underground, if you do have a significant sound during tight turns, in this case the squealing that we hear, and even new modern rails have that, and part of the reason they didn't want to go to this route before was because of the such tight turns that would take place coming from out of the station both at south U.B. and then the turn right before coming out of the tunnel. So that sound will go to reverberate into the residential neighborhood there.

So I have a lot of concerns there that I think need to be addressed and can be successfully addressed if they're taken seriously.

A couple other quick things is I would like to see NFTA support an additional station downtown. Once I get downtown I have to rely on the unreliable bus system to get anywhere else and I end up driving and then my last comment is to look at the station spacing because for this to be successful you have to be in proximity to a station and the spacing that we have, and aside from the campus itself, is the maximum spacing for the Metro running down Collins. So I would like to see some stations closer together.

Comments

Please provide your comments on the Draft Environmental Impact Statement.

I AM ADVOCATING FOR THE MULTIMODAL/
INTERMODAL ASPECT OF THE CORRIDOR.

BY 2024 AND BEYOND, DRIVERS OF ZERO-
EMISSION VEHICLES WILL BE EVEN MORE
PREVALENT (I AM AN EARLY ADOPTER). EV
OWNERS WITH NO HOME/WORK CHARGING ACCESS,
E.G., IN MULTI-TENANT DWELLINGS, WILL BENEFIT
FROM IN-PLACE EVSE (CHARGING) INFRASTRUCTURE
AT PARK-AND-RIDE AND STATION LOCATIONS,
LEVEL-1 (SLOW CHARGE) FOR ALL-DAY CHARGING, LEVEL
2 FOR QUICKER CHARGING ARE MOST DESIRABLE,
THOUGH DC FAST CHARGING STATIONS COULD BE A
PRIME TIE-IN TO THE HIGH VOLTAGE ON PREMISES.

ALSO, THE PLANNED PAVING OF THE "PEANUT
LINE" RAILWAY CORRIDOR LINKING CLARENCE TO
TONAWANDA AND POINTS BEYOND MUST SEE
INTEGRATION WITH THE CORRIDOR.

Comment Submission Deadline: 4:00pm on March 24, 2020

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: JOHN P. WEIKSNAR

Address: [REDACTED]
BUFFALO NY

Email: [REDACTED]

Phone: [REDACTED]

Affiliation (if applicable): CITIZENS
FOR REGIONAL TRANSIT;
TESLA OWNERS NY STATE

Have more to say? (AS A MEMBER
OF EACH,
Email us at railx@nfta.com
NOT A
REPRESENTATIVE



NFTA - RECORD #756 DETAIL

Status : Unread
Record Date : 2/11/2020
Submission Date : 2/11/2020
First Name :
Last Name : Wells
Agency/Affiliation/Business :
State : NY
Zip Code : 14150
Submission Content/Notes :

The Light Rail would be quieter and better for the environment

Submission Method : Website

NFTA - RECORD #805 DETAIL

Status : Unread
Record Date : 3/4/2020
Submission Date : 3/4/2020
First Name : Brian
Last Name : White
Agency/Affiliation/Business :
State : NY
Zip Code : 14202
Submission Content/Notes :

I am not in favor of the proposed expansion of the Metro Rail, for the following reasons:

1. **Cost.** I combed through the DEIS and could not find any cost estimates for the expansion. However, other sources estimate the cost at \$1 billion or more. Virtually all of this money will be derived from the Federal, State and local governments, meaning the taxpayer. New York State is becoming less influential in Washington, DC and the Buffalo area is becoming less influential in Albany due to population decline. Therefore, government funding for infrastructure projects in the Buffalo area will be harder to obtain. Buffalo-area leaders will need to choose wisely when asking for infrastructure funding, and if \$1 billion is spent on an expanded Metro Rail there will be less money to spend on other more worthwhile projects. Furthermore, ongoing costs of operating and maintaining an expanded Metro Rail will need to be government-subsidized, and such funding could be better spent elsewhere.
2. **Need.** Although the DEIS claims that an expanded Metro Rail will meet an unfilled need, such a prediction is speculative. Despite a so-called “renaissance” taking place in Buffalo and surrounding areas, the population remains stagnant or in decline with large numbers of low income persons. In particular, many of the areas in Tonawanda and Amherst that will be served by an expanded Metro Rail have experienced population decline, a growing elderly and low income population, and disinvestment by businesses, particularly retailers. The Boulevard Mall, like many malls across the U.S., is in decline and will likely close or be repurposed in the near future. Many areas along the proposed route have few businesses and retailers that persons would need to travel to, such as Niagara Falls Boulevard south of Eggert, and parts of Maple Road and Sweet Home Road. Few suburban residents would use the expanded Metro Rail unless they live and work close to the route. With so few available bus routes in these towns, few residents could take a bus to link up with the expanded Metro Rail. The claims in the DEIS that an expanded Metro Rail will result in economic expansion along the route also remains speculative. The current Metro Rail was expected to be an economic boon for Buffalo when it was being planned. But the Metro Rail likely contributed to the decline of Buffalo in the 1980s-2000s and contributed little if anything to the City’s “renaissance” in the 2010s. Similarly, it is unlikely that an expanded Metro Rail will result in economic improvement to the areas it will serve.
3. **Alternatives.** Much of the same route that is being planned for the Metro Rail expansion is already being served by NFTA and/or UB busses. Rather than spending over \$1 billion to expand the Metro Rail along this route, the NFTA should simply assign more busses along this route, and alter current bus routes to make them more convenient for more people. Such busses will need to arrive with such frequency and reliability to make it worthwhile for persons to use these busses to regularly commute to work, school and shopping. Busses also allow for greater flexibility compared to a fixed Metro Rail line that cannot be moved to adapt to changing transportation patterns. If the NFTA and the community are concerned about having a low environmental impact, the NFTA could use clean fuel busses along the route, which it already owns, and electric busses. Self-driving busses could be used in the near future to save labor costs and increase reliability. To enhance reliability and efficiency, stop lights along the route could be timed and/or controlled to allow for swift movement

NFTA - RECORD #777 DETAIL

Status : Unread
Record Date : 2/17/2020
Submission Date : 2/17/2020
First Name : Tom
Last Name : Wujek
Agency/Affiliation/Business :
State : NY
Zip Code : 14094
Submission Content/Notes :

I think the overall alignment works well for this project. I think that it will create a high level of ridership and that it needs to proceed forward. However, I think that there should be some changes to the station names and 1 change to the alignment by extending it further northward.

The first change is changing the I-990 Station name to Muir Woods. This reflects the name of the proposed office park that is planned to be built at the station and also provides a better point of reference.

The second change is changing the name of the Boulevard Mall station to Boulevard Place, which will reflect the name the current Boulevard Mall will take after redevelopment.

The third change is modifying the name of Flint Station to Flint-UB North Campus. This provides a point of reference for the main academic complex.

The fourth change is modifying the name of the existing University Station to City Line-UB South Campus. This provides a point of reference for the current academic complex on the South Campus and will make it easier for people to distinguish between both campuses.

The fifth change I would suggest is modifying the alignment for the I-990 station. I think the northern end of the line should be extended down I-990 into the Crosspoint Business Park. That business park is home to 20-30,000 people per day that commute and has an existing Park & Ride. Also, having worked in that business park, as much as 40% of the employees that I had use Metro Bus/Rail as part of their commute. By extending the line and creating a Crosspoint Station, it will really help with ridership, reduce significant rush hour congestion on North French Rd/Millersport Hwy, and provide a 1 seat rail commute for many people. If an extension to Crosspoint is not part of this project, the alignment should be designed in a way where the line can easily be extended down the median of I-990 while still having easy access to the proposed maintenance facility.

For infrastructure, it may be beneficial to upgrade from the existing 650VDC overhead current to 1500VDC overhead current. This will reduce the overall number of substations needed, reduce energy loss, and provide a more robust system that can handle additional rail travel. Currently, Link Light Rail in Seattle has adopted this in a similarly built system to Buffalo and has enjoyed great performance from this.

Finally, I would advocate that all new stations be high level platforms for the entire train length (280 ft long platforms). This allows people who have disabilities or mobility impairments to board more easily.

Submission Method : Website

NFTA - RECORD #793 DETAIL

Status : Unread
Record Date : 2/26/2020
Submission Date : 2/26/2020
First Name : Daniel
Last Name : Zakis
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

Hello,

I hope among the no doubt countless submissions that this finds it way to someone's eyes that can read and hear it for what it's worth.

I am an environmental design student at the University at Buffalo. I cannot comment on the environmental impact of this project with my modest schooling. I can however offer some insight as to how amazing I believe this project would be for the city.

I have taken it upon myself to start biking to the university as a sort of experiment. From my home in Tonawanda I ride through quiet streets that are fairly pleasant and then I reach the boulevard.

The boulevard is an absolute abomination and it is laughable that there are even sidewalks on it. As soon as I reach the boulevard to cross from Curtiss I feel as though I am in a life or death situation.

The boulevard is essentially a 6 lane highway in a residential and commercial area with no barricades. People drive well over the speed limit at what is probably 50 miles per hour or higher. It is detestable to even breath the air walking up to cross the road.

I approach the street light and wait an inordinate amount of time for a crossing signal. After I get the signal and legally cross while walking my bike I nearly get hit by a vehicle careening through the cross walk at 35 miles per hour every time. There is no regard for human life here.

The metro rail expansion would completely eliminate this situation from existence for my self and any other poor souls who have but no choice to walk in this area. I do not need to expound upon the positive impacts it would have on commerce and property values. I think that beyond any of that we need to consider this project a public service to the people of this city.

I support this project in any way possible and I appreciate this outlet to voice that stance. Thank you for the opportunity.

Daniel J. Zakis Jr.

Submission Method : Website

NFTA - RECORD #775 DETAIL

Status : Unread
Record Date : 2/14/2020
Submission Date : 2/14/2020
First Name : Rick
Last Name : Zanelotti
Agency/Affiliation/Business :
State : NY
Zip Code : 14223
Submission Content/Notes :

I live in the middle of this right on the Blvd,Do I like this [REDACTED] no ,But does that matter no The way are state and Federal government works we the people have no rights .I do t understand how you can make the Blvd a 1 lane street when itis as busy as [REDACTED] now.And the Value of our property will go down,But that is not a big loss to you so why would you care.

Submission Method : Website

Comments

Please provide your comments on the Draft Environmental Impact Statement.

I have a number of concerns: (1) With the raised track plan down the middle of Niagara Falls Blvd - This will lengthen response time for first responders causing them to use inter-sections (such as Longmeadow). (2) If this is to be handicapped accessible - how do you intend that wheelchairs (those with walkers cross traffic, especially in snow, to arrive at peak forms. Accumulated snow plowed onto sidewalks will hinder them. (3) At the terminus point at the 990 (Student housing) - if this is for all to use, where is the park & ride parking for surrounding neighborhoods. Even the new "The Preserve" community now going in fails to provide parking for residence to use mass transit. (4) One lane in each direction (north & south) on NFB is inadequate. The daily traffic on the Blvd surpasses what you are allowing with this plan. (5) The transit (when built in downtown running down the middle of main street) killed downtown business. This plan in my view, will kill businesses along it's route especially along NFB. (6) I anticipate, once this is established, seeing an increased crime rate in Amherst.

Comment Submission Deadline: 4:00pm on March 24, 2020

We want to hear from you

Please use the space on the left to share your comments. If you need more space, please feel free to fill out additional sheets.

Note: Personal information, if provided, may be published in environmental documents that are publicly circulated. Commenters may choose to exclude personal information.

Name: Patricia Zebrowski

Address: [REDACTED]
GETZVILLE NY 14068

Er: [REDACTED]

Phone Number: [REDACTED]

Affiliation (if applicable): N/A

Have more to say?

Email us at railx@nfta.com

