



**CITIZENS for REGIONAL TRANSIT**

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NFTA  
181 Ellicott Street  
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Attention: Service Planning

Below are our updated and final comments on the service plan changes that were discussed at the recent NFTA public hearings held on August 23rd, 24th, and 25th. These comments provide additional detail and expand and supplement the comments we provided verbally at the Public Hearing on 25 August 2021.

The focus of the NFTA Public Hearings held on August 23<sup>rd</sup>, 24<sup>th</sup> and 25<sup>th</sup> was general, covering several topics. These included “a proposed service plan, fare structure modifications and accompanying Title VI analysis” and “planned changes to the bus system and upgrading the fare collection system”

Our comments are accordingly general, covering these areas, including comments on the specific material presented at the hearing.

**Proposed service plan.** These comments refer to the recently updated NFTA-Metro “*Service Design Guidelines & Delivery Standards – 2021 Revision*”. (Reference 1.) We agree that this document needed updating (last updated in 2012) but were disappointed that the NFTA Board of Commissioners adopted the updated version before public comments could be made. Citizens for Regional Transit had just started reviewing the draft that was posted without announcement, when it was quickly approved by the NFTA Commissioners and then announced as final at the next Citizens Advisory Committee (CAC) meeting. These are foundational NFTA transit service guidelines, consequently there should have been an opportunity for public comments as called for in the “*NFTA-Metro’s Public Participation Plan – 2018 Update*”. (Reference 2.)

These updated guidelines and service delivery standards should have been tied to the NFTA-Metro mission and vision and not just benchmarked to other transit systems. They should have included aspirational guidelines that would meet stated NFTA-Metro goals, while recognizing budget limitations. Budget-limited basic service guidelines meeting the most essential needs could be distinguished from service guidelines meeting the “highest level ... of public transportation” called for in the NFTA mission statement, and which will attract new riders and address equity issues plaguing our society.

The inclusion of service guidelines that satisfy the NFTA mission and vision statements in addition to budget-limited service levels would give meaning and substance to these visionary statements. Their absence leaves the NFTA-Metro vision statements as vague,



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empty platitudes. Further, establishing service delivery standards only based on currently available budgets diminishes the long-term value of this document. We hope the NFTA will reconsider and update this document making the changes recommended here.

**Transit Development Plan.** We are very supportive of the long-range “*Transit Development Plan*” published by NFTA-Metro in April, 2019. (Reference 3.) The plan lays out a schedule for many phased system improvements over the next many years. It includes expansions of Buffalo Metro light rail rapid transit, the new DL&W terminal at Canalside, more and better bus shelters, and many more long-term improvements. We are especially pleased that the NFTA has added study of southern and eastern light rail extensions in this plan. This outline of improvements is visionary. While it requires budgets to be made available, it sets the foundation and roadmap for significant transit improvements. We look forward to working with the NFTA in achieving these improvements.

**Bus system route changes.** We are pleased that proposed route-by-route changes have been made available for public review using very understandable geographic descriptions with explanations. We have always supported the goals of the NFTA-Metro’s “*Erie and Niagara County Service Plan*” developed by consultant TMD in July 2016. (Reference 4.) We believe the latest proposed route changes are consistent with the goals of the 2016 report that we concur with. Specifically, the 2016 proposed changes called for more frequent service on “Primary/Core Routes” with reduced service (if necessary to meet budget limitations) on “basic local” routes and the elimination of some routes with service provided through route consolidation where feasible. We believe the currently proposed changes are being made consistent with these goals, which is evident on the routes that CRT Board Members use and are familiar with. Our board members have provided feedback for specific routes on the NFTA website.

**New Fare Collection System.** We are glad the NFTA is introducing more high-tech ways to pay fares, as that is what younger riders prefer and expect, and what will attract and retain the next generation of ridership. We are also pleased the automated fare collection system will provide better data on ridership that can be used to improve service. We are very happy that the new system will allow automatic fare capping at all levels so when riders meet the requirements of day pass, weekly pass, or monthly pass, they will automatically be changed to the associated reduced fare. The original proposal to offer only limited fare capping would hurt less affluent riders. The change to youth, 10 and under, riding free when with a parent, rather than half fare up to 11, seems like an improvement that will make transit more affordable for families traveling with children. Finally we recommend that the NFTA continue to offer a cash fare option, since many immigrant riders and others on the low end of the income spectrum are unbanked.

**Bus Stop Balancing.** We agree that it is worth looking at reducing bus stops in places where they are too close together, in the interest in speeding service. However, more bus stops provide more convenient access for riders and don’t slow service when the bus does



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not stop to pick up passengers at every stop. The decision should depend on the specifics of the route. Routes like Niagara Falls Boulevard can afford to have more stops sparsely used while more heavily used routes like Grant Street can speed service with fewer stops.

Of course, the ultimate goal for optimizing service should be more frequent buses and expanded high capacity, high-speed light rail. Saving a few minutes on infrequent bus routes still require riders to leave home early for work or appointments, adding significantly to commute times regardless of stop efficiencies. Infrequent routes also increase travel times in complicated ways when route transfers are required. We need more frequent buses.

We are pleased that route-by-route public review of bus stop changes are being conducted using very understandable geographic displays and with signage at the actual stops. We support this approach. Riders on specific routes are best able to provide the best feedback.

**Concluding Remarks.** We commend the NFTA managers and staff for their high-quality professional service and offer these comments as constructive feedback in the interest of making Buffalo-Niagara transit the best it can be, with the ultimate goal of making transit as attractive and convenient as driving, and providing a viable travel option that will help address the existential climate crisis we all face.

**References:**

1. *NFTA-Metro. Service Design Guidelines & Delivery Standards – 2021 Revision.*
2. *NFTA- Metro. Public Participation Plan – 2018 Update.* <https://metro.nfta.com/media/2978/ppp.pdf>
3. *NFTA-Metro. Transit Development Plan: Service Planning Department. April 2019.*
4. *NFTA-Metro. Erie and Niagara County Service Plan. Prepared by TMD. July 2016.*

Thank you for considering our comments.

Sincerely,

Douglas Funke  
President, Citizens for Regional Transit