



**CITIZENS for REGIONAL TRANSIT**

617 Main Street, Suite #201, Buffalo, NY 14203  
716-691-8528      crtc@citizenstransit.org

9 July 2024

Ms. Nicole McGrath  
Community Planner  
Leo W. O'Brien Federal Bldg. Ste 952  
11A Clinton Avenue  
Albany, NY 12207  
Nicole.McGrath@dot.gov

Ms. Robyn Siquefield  
Community Planner  
Office of Planning and Community  
Development  
One Bowling Green, Ste 434  
New York, NY 10004  
Robyn.Siquefield@dot.gov

Dear Ms. McGrath and Ms. Siquefield:

I have attached our comments about the transportation planning process at the Greater Buffalo Niagara Regional Planning Council (GBNRTC) as part of their annual Federal Certification Review. As we stated at the meeting, we are very familiar with the GBNRTC processes. We have attended GBNRTC public and planning meetings and reviewed transit-related documents and TIP updates for over 20 years. Also, our Board Member, Thomas DeSantis, was a member of the GBNRTC Board for over 10 years.

I have attached the following:

- Attachment 1. Our answers on the recertification survey.
- Attachment 2. An article we published in our quarterly newsletter that describes specific disappointments on the NYSDOT / GBNRTC decision on the Kensington Expressway Project.
- Attachment 3. A position paper delivered to the US Environmental Protection Agency (EPA) and NYS Department of Environmental Planning (DEP) at their recent listening session in Niagara Falls.

Thank you for considering our comments. As we stated at the GBNRTC Planning meeting, we are very pleased with the work of the GBNRTC but take strong objection to the decisions regarding the Kensington Expressway Project as reflected in the above attachments.

Sincerely,

Douglas Funke  
President, Citizens for Regional Transit (CRT)

Cc. Mr. Michael Finn, PE, Executive Director, GBNRTC



# Attachment 1

## Citizens for Regional Transit (CRT) Completed Survey

### Greater Buffalo-Niagara Regional Transportation Council Certification Review Public Survey

**1. How well do you understand the Greater Buffalo-Niagara Regional Transportation Council's transportation planning process?**

Pretty well. We have worked with and monitored GBNRTC for over 20 years and our newest board member, Tom DeSantis, previously served as a GBNRTC board member. We attend GBNRTC public meetings and review public documents when they relate to public transit. The addition of Mr. DeSantis has added a deeper and more complete understanding than before.

**2. How well is the Greater Buffalo-Niagara Regional Transportation Council's transportation planning process working to effectively improve transportation in the region?**

The GBNRTC staff is highly skilled. They develop high level regional plans and collect data such as traffic counts and surveys to inform the transportation planning and operations. This information is high quality and maintained online for Member Organizations and public access.

GBNRTC's professional staff is very effective in their planning role. They engage outside agencies, community-based organizations, and the public to inform and provide inputs to their work. For example, the successful One Region Forward Planning documents was a team effort with the Buffalo Niagara Partnership and University at Buffalo's Regional Institute and included volunteer expert community-based working groups to focus on specific areas of the plan. Many workshops and public meetings were held. This plan has been expanded to address more specific needs such as fighting climate change and has become a foundational resource for all transportation planning in the region along with other GBNRTC plans.

One strength of the GBNRTC staff is effective public involvement. All plans are provided in draft for public review and Public Meetings are held at key development stages. GBNRTC recently led a community focused effort to redesign the Scajaquada Expressway as a park that was exemplary and should serve as a model for moving forward on the Kensington Expressway Project.

GBNRTC Member Organizations are responsible for implementing transportation projects building on the GBNRTC high level plans. This includes developing detailed implementation plans with continuing public engagement. The Member Organizations also provide inputs to the GBNRTC high level plans. It is the Member Organizations' work where GBNRTC effectiveness falls short. For example, we were recently disappointed that NYSDOT's Kensington Expressway Project was omitted from the draft (and final) UPWP where every project is assessed against to the FHWA / FTA



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Project Emphasis Areas (PEAS). Attachment 2 is an article that was in our recent newsletter describing this disappointment.

We were especially disappointed in NYSDOT's detailed planning of the Kensington Expressway. It does not follow the guidelines of the GBNRTC's One Region Forward Planning documents and violates NYS environmental laws, including the NYS Constitution's "Green Amendment". The planning process for this project was flawed from the start. Only selected groups were allowed to participate in planning meetings. For example, when CRT asked to be included, we were told we weren't welcome and had to deliver our comments privately at the NYSDOT office. Public meetings were only held after the flawed tunnel approach was selected. Public microphones were not provided until the final Public Hearing after the Draft Design Document / Environmental Review was published and construction schedules were announced. Most speakers were opposed to the plan.

NFTA detailed planning does better. For example, the NFTA has established an ongoing Community Action Committee (CAC) with community representation where transit planning issues are discussed. The NFTA also established an advisory committee with community representation to guide planning for the Buffalo Rail Amherst Extension Project. CRT was an invited member of this working group. Public meetings with public microphones are also held on this and all major NFTA projects. There are areas where the NFTA could improve. For example, there was no opportunity for public review of the latest NFTA service plan update and we wish there could be a public comment period at NFTA Board Meetings like there are for GBNRTC meetings. Overall, we are satisfied with NFTA planning operations.

### **3. Are there opportunities for you to provide input on transportation issues and plans, such as the long-range transportation plan and other studies and issues?**

Yes. GBNRTC meetings are public, including planning committee meetings, and include a public comment period where the public can make comments. The public is also able to speak with Board Members informally after the meetings. The public is also always able to submit written inputs on topics of interest or concern. All GBNRTC meetings are announced ahead and include reminders by email with agenda for those who have signed up to receive them, as we have. All documents and TIP modifications are posted online and available for easy public review. Our comments on draft plans are usually reflected in the final document.

However, in contrast to most GBNRTC projects, we are disappointed that the Kensington Expressway Project is being pushed through by NYSDOT and the Governor, without meaningful public inputs. This is especially maddening when this project violates the NYS environmental mandates including the Climate Leadership and Community Protection Act (CLCPA) and NYS Constitution's "Green Amendment."

We are disappointed that the FWHA has agreed with NYSDOT that only a Finding of No Significant Impact (FONSI), and not full Environmental Impact Study (EIS), is needed on this project, let alone a full Planning and Environmental Linkages (PEL) analysis as called for in the FHWA PEAs. A large generational public investment of \$1B with long-term public health impacts should not be pushed through without public input.



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### **4. Are there opportunities for people of all ages, abilities, incomes, and races to provide input in the transportation planning process?**

Yes. GBNRTC meetings are open to all and accessible. Most are reachable by public transit, and all are available online via Facebook streaming with meeting material online access. Meetings are held in varying locations across the two-county region to make it easier for citizens to attend. We are disappointed that more organizations like ours don't take advantage of GBNRTC's open process for accepting public and community inputs.

### **5. Are all transportation network users and communities in the region represented equitably in the planning process?**

GBNRTC tries to involve all communities and consider equity as a planning component. For example, GBNRTC does periodic outreach and surveys of public transit users, a group that is too often outside of the decision-making process. The GBNRTC / NFTA surveys consistently find that transit is overwhelmingly used by poor, disadvantaged, and minority populations and identifies transit deficiencies that need to be corrected. As transit users ourselves we agree with the findings. The service is too infrequent, and the fast high-capacity light rail rapid transit (LRRT) is limited to just a short run. The GBNRTC and NFTA are now working on projects to extend Buffalo's LRRT. The NFTA is also working to increase transit bus frequencies using additional operational funding provided by the State. We support these efforts and look forward to more frequent bus service and additional LRRT extensions in the future building on this foundation.

GBNRTC deserves great credit for partnering with the Buffalo-Niagara Partnership and the UB's Regional Planning Institute to conduct an extensive regional planning initiative, the One Region Forward Program noted above. This effort has involved community outreach and meetings held in urban and rural locations across the two-county region. The effort continues and has resulted in numerous planning documents that guide all regional transportation projects. This approach has led to plans and projects that satisfy equity and region-wide transportation goals.

As noted above, it is at the Member Organization project level that things go wrong like for NYSDOT's Kensington Project.

### **6. What are some things that work well?**

Community-driven projects are key to success. The One Region Forward initiative noted above is a prominent example: highly successful and a key driver in transportation projects across the two-county region. Another example is the GBNRTC Region Central initiative. When NYSDOT's plan for redesigning the Scajaquada Expressway met with public disapproval, Governor Cuomo asked the GBNRTC to take over the planning using a community-driven approach. This has been highly successful and resulted in a high-level plan that removes the Scajaquada in favor of a slow-speed parkway alternative that restores Delaware Park.

What doesn't work is when the Governor and NYSDOT mandates project plans that shun public involvement, like is being done on the Kensington Expressway Project.



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### 7. What areas do you think can be improved.

More community-driven planning is key. When this is not done, we fail, like on the Kensington Expressway Project. When projects are planned based on high level political dictates that override community desires and environmental laws and guidelines, they are a disaster. Projects that end in lawsuits are an indication that community outreach during planning has failed.

We now have new laws and guidelines (e.g., the PEAS, the CLCPA, the Constitutions' Green Amendment) that call for making important societal and infrastructure investment changes to address climate change and historical equity failures. They need to be followed and given the highest priority. The Kensington Expressway Project is a perfect example of a failure to involve the community and follow new environmental and equity mandates. It will make pollution worse in many places and perpetuate the past failures we need to fix. We need to follow new priorities based on the new environmental and equity laws and guidelines. Note that the PEAs are Planning ***Emphasis*** Areas, not Planning ***Think About*** Areas, they need to be emphasized and prioritized. They need to be a primary and driving part of project planning. They need to be followed.

Sadly, the Kensington Expressway project will spend \$1B to put just  $\frac{3}{4}$  of a mile of the expressway in a tunnel, leaving the rest as is and concentrating particulate pollution in the residential area near the portals. The same \$1B could be applied to extending Buffalo's light rail rapid transit through the East Side to the airport – that is, all track, cars, stations, and signaling equipment! Instead, the Kensington tunnel plan will perpetuate the Kensington mistake and continue to pollute the disadvantaged communities it goes through. It's time for new thinking and priorities based on the latest environmental laws and mandates.

One more thing. There is a problem with how transportation projects get funded leading to poor choices in what projects get selected in the first place. Highway projects get 80% federal funding, while transit projects get 50%. No wonder, we keep making the same mistake and prioritize highways over public transit. This funding formula needs to change to reflect 21<sup>st</sup> Century mandates and priorities. Transit projects should get reimbursed at the same or higher rates as highways.



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## Attachment 2

### CRT President's Column in CRT's April Newsletter

### 15 May 2024

#### **Why Is the Kensington Expressway Project Not Included in the GBNRTC 2024 - 2026 Unified Planning Work Program?**

By Douglas Funke, CRT President

As defined in the 2024-2026 Unified Planning Work Program (UPWP) Report the UPWP is a:

*"... biennial statement of work identifying the planning and work priorities and activities to be carried out within a Metropolitan Planning Organization" (MPO).*

Our Metropolitan Planning Organization is the Greater Buffalo Niagara Regional Transportation Coalition (GBNRTC) covering Erie and Niagara Counties. The UPWP report identifies and describes major WNY transportation projects. For example, the 2024-2026 UPWP includes the Buffalo Metro Expansion Project along with many other projects in various stages of planning and development. Here's a link to the report.

<https://static1.squarespace.com/static/56ccbbfd3c44d8670dbd1d84/t/65dcf57d77c7566e091b994e/1708979583879/GBNRTC+UPWP+24-26+Final.pdf>

***Shockingly, the Kensington Expressway Project is not included in the 2024 – 2026 UPWP.*** CRT reviewed the draft UPWP and submitted formal comments that asked why. Here's GBNRTC's response:

*"Regarding the Kensington Expressway, NYSDOT is advancing its project through environmental review as of the time of the UPWP development. Any future planning for the Rt. 33 corridor, including connecting the Region Central concept, would be best suited to be undertaken after the conclusion of the environmental review for the current project. "*

Really? Other projects that are in planning and environmental stages are included in the UPWP. For example, the Bailey Avenue Corridor Study, the I-90 Exit 50 Planning and Environmental Linkage Study and the Buffalo Metro Expansion are included. Why isn't the Kensington included in the UPWP?

This is disappointing because every project in the UPWP is analyzed with respect to the FHWA Planning Emphasis Areas (PEAs). According to the UPWP draft report:

*"GBNRTC has incorporated FHWA Planning Emphasis Areas (PEAs) into all of its UPWP tasks."*



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Since the Kensington Expressway Project is not included in the UPWP there is no accounting of whether and how the PEAs are incorporated. Here are the FHWA PEAs and our assessment of how well or whether the Kensington Project incorporates them.

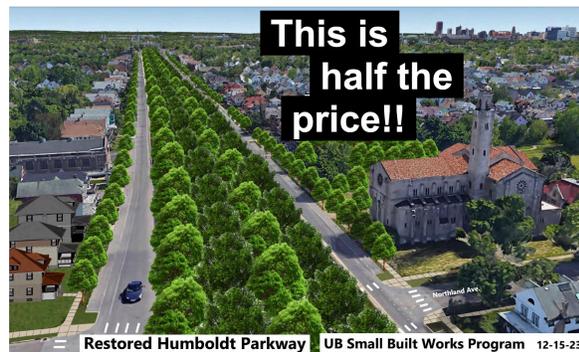
<b>FHWA Planning Emphasis Areas (PEAs)</b>	<b>The Kensington Expressway Project</b>
<b>Tackling Climate Change</b> – Transition to a Clean Energy, Resilient Future. “... reducing single-occupancy vehicle trips and increasing access to public transportation, shift to lower emission modes ...”	<b>FAILS.</b> The expressway project is designed to maintain the same vehicle capacity and ignores potential East Side Metro Rail public transit options.
<b>Equity and Justice40 in Transportation Planning</b> – “... deliver 40 percent of the overall benefits of relevant federal investments to disadvantaged communities” ... “implement the goals of the Justice40 Initiative utilizing existing data sources and indices that are currently used by programs serving low income, vulnerable, and underserved communities ...”	<b>FAILS.</b> The benefits of the project go to suburban commuters while the pollution remains concentrated in a disadvantaged minority community. Only a portion of the road will be in a tunnel. Pollution will increase at portals with no improvement in uncovered portions of the expressway.
<b>Complete Streets</b> – “... promote Complete Streets principles in the region... provide an equitable and safe transportation network for travelers of all ages and abilities, including those from marginalized communities facing historic disinvestment. ...”	<b>FAILS.</b> This project is the opposite of a complete street. While there will be some green space on top of the tunnel the 6-lane expressway will continue to deliver 70,000 cars at highway speeds through the historically disadvantaged neighborhood. Only a portion of the expressway will be covered.
<b>Public Involvement</b> – “... early, effective, and continuous public involvement brings diverse viewpoints into the decision making...”	<b>FAILS.</b> Project planning was restricted to invited community groups only. <b><i>CRT was told we were not welcome</i></b> and were directed to the DOT office to register comments privately. Public Meetings were held after the project design was selected. Only one Public Hearing with public microphones was held after the Draft Design Report / Environmental Assessment was published. Most speakers were against the tunnel.
<b>Strategic Highway Network (STRAHNET)</b> – ... consider national security ramifications...	<b>Not Applicable.</b> The Kensington is not part of the STRAHNET.
<b>Federal Land Management Agency (FLMA) Coordination</b> – “... consider needs related to connecting to Federal lands ...”	<b>Not Applicable.</b>
<b>Planning and Environmental Linkages (PEL)</b> – “... decision-making that considers environmental, community, and economic goals early in the transportation planning	<b>FAILS.</b> A full Environmental Impact Statement was not conducted, let alone a PEL. CO <sub>2</sub> pollution requirements of the Climate Leadership & Community Protection Act were



<p>process, and uses the information, analysis, and products developed during planning to inform the environmental review process ...”</p>	<p>ignored. Particulate pollution will increase by 6% at tunnel portals with increased pollution in uncovered parts of the expressway. Public health impacts were not evaluated. The NYS Constitution’s “Green Amendment” is being violated.</p>
<p><b>Data in Transportation Planning –</b> “...incorporate data sharing and consideration into the transportation planning process ... allows for efficient use of resources and improved policy and decision-making. ...”</p>	<p><b>FAILS.</b> The East Side Parkways Coalition had to FOIL NYS DOT to get arterial traffic impact data, which show that the arterials can handle the Kensington traffic.</p>

***Is this why the Kensington Expressway Project was omitted from the 2024-2026 UPWP?*** It fails to address and does not meet any of the FHWA PEAs. Its omission from the UPWP hides this failure. We call on the DOT to slow down, evaluate compliance with the PEAs and make modifications needed. This should at least include a full EIS and a public health effects analysis. It should seek and integrate community inputs. CRT has joined many other community groups – including GOBike Buffalo, WNY Olmsted Conservancy, East Side Parkways Coalition – to oppose the tunnel approach and implement a community-driven process that considers all alternatives including full restoration of the Humboldt as a surface parkway. ***Other NY cities are getting highway removal, why not Buffalo’s East Side?***

Will you join us in signing an ESP e-letter to government and political leaders across local, state, and national levels? Please take a minute to add your name to this important e-letter. Here’s a link: <https://actionnetwork.org/letters/humboldt-parkway-restoration-project>



**Today’s Kensington Expressway cuts through Buffalo’s East Side**

NYS DOT’s tunnel proposal leaves vast sections of the Kensington unimproved! Particulate pollution will be increased and concentrated at tunnel portals in violation with NYS environmental laws and the NYS Constitution’s “Green Amendment”. (Picture Source: UB Small Built Works Program)



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## Attachment 3 Policy Statement Delivered to USEPA / NYSDEP Listening Session

### **Actions vs. Promises on Climate Change**

Read and Distributed at WNY Environmental Listening Session

15 April 2024

Niagara Arts and Cultural Center  
Niagara Falls, NY

By Douglas Funke

President, Citizens for Regional Transit

Now that we understand the existential threat of climate change and have passed a myriad of laws and guidelines to mitigate its existential threat (References 1 through 4 and others), why do we continue to develop highway centric projects that violate the new laws and guidelines (References 5 through 8). We now even have a NYS Constitutional Amendment (passed by the voters by a 2 to 1 margin) that says “*each person shall have a right to clean air and water, and a healthful environment.*” (Reference 9). How can we make NYS agencies follow the new environmental and associated social justice goals and the NYS Constitution’s “Green Amendment”?

This includes NYSDOT whose Kensington Expressway Project’s preferred plan violates the new environmental laws and social justice goals established to fight climate change and rectify past racist policies.

The NYSDOT Kensington draft preferred design document says that it is “consistent with” the CLCPA law because CO<sub>2</sub> is reduced by 0.04% by 2047. But the CLCPA requires 40% reduction by 2030 and 85% by 2050. The plan also admits that particulate pollution near the portals goes up by 6%. It is not following the CLCPA.

The NYS Draft Scoping Plan (for meeting the CLCPA requirements) calls for reductions in vehicle miles travelled (VMT) and investments in alternative clean transportation modes, like and especially public transit. Note that the \$1B being spent on the Kensington would be enough to extend Buffalo’s hydro-powered light rail to the airport and a park & ride near Transit Road. But the Kensington plan’s stated objective is to maintain current VMT and does not consider alternative transit solutions.



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All projects in the GBNRTC 2024-2026 Unified Planning Work Program (Reverence 10) identify how projects address the FHWA / FTA Planning Emphasis Areas (PEAs). But the Kensington Project is omitted from the UPWP so no accountability vis-à-vis the PEAs is available. See Attachment 1 for our assessment of how the Kensington meets the PEAs.

The PEAs call for projects emphasize:

- Tackling Climate Change
- Equity and Justice 40 in Transportation Planning
- Complete Streets
- Public Involvement
- Planning and Environmental Linkage (PEL)
- Data in Transportation Planning

The USDOT Equity Action Plan (Reference 7) calls for focus on equity and emphasizes community involvement. NYSDOT community outreach was with invited groups only. When CRT asked to attend, we were told we were not welcome at that we had to go the NYSDOT office to give our feedback privately. Public meetings were only held after the design approach was selected.

We call on NYSDOT to slow down, do a full Environmental Impact Statement (EIS) with full public and community involvement like was done for the Region Central Project. It's not too late to follow environmental guidelines and the NYS Constitution's "Green Amendment".

Sincerely,

Douglas Funke  
President. Citizens for Regional Transit

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