



CITIZENS for REGIONAL TRANSIT

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

5 December 2024

Mr. John Cox, Chief Financial Officer
Niagara Frontier Transit Authority
181 Ellicott Street
Buffalo, NY 14203

Dear Mr. John Cox:

This letter contains our comments on the NFTA FYE 2025-2026 draft budget. We thank the NFTA for making the draft budget available electronically again this year. This makes our review more efficient and less time consuming than having to go physically to the library and copy selected pages as in prior years.

High Level Comments and Questions:

The “KEY PERFORMANCE INDICATORS” in Page 2-5 are difficult to understand taken in isolation. For example:

“Costs per revenue hour” for rail vs. fixed transit (bus) is \$457.71 vs. \$186.66. It looks like rail costs more. But rail:

- Moves at 50MPH between stops (underground)
- Has capacity of 560 per 4-car train (vs. 40 for bus)
- Carries 20% of all NFTA passengers on just 6 miles. (vs. over 1,000 miles of bus service). (See Figure 2 below.)
- Attracts riders across a wide range of demographics (vs. bus that primarily attracts poor people who can't afford cars).
- Is the only transportation mode that can significantly reduce vehicle miles traveled (VMT) as called for in Climate Leadership and Community Protection Act (CLCPA). (See Figure 3 below.)

“Farebox Recovery” for rail vs. fixed transit (bus) is 11.5% vs. 20%. But it isn't clear what is included in these statistics. Are environmental costs included? Are the following factors considered?

- Buses cost 50% less but last only 12 years vs. 40 years for rail cars.
- Buses cover greater distances with fewer passengers.
- Buses have rubber tires with plastic binders that wear out causing pollution to air, land and water. Tires are virtually impossible to recycle in contrast to steel wheels on rail.
- Buses require one operator for each bus vs. one operator per high capacity, high speed 4-car trains.



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- Buses cause more damage to the environment.

Clearly these are difficult items to get one's hands around. The NFTA Annual Performance Report also lacks underlying assumptions and details behind these measures. Can the NFTA provide details of how these factors are calculated?

"KEY POINTS" on Page 2-7 would be better named "KEY PROGRAMS AND PRIORITIES"

The "PROGRAM AND SERVICE OBJECTIVES" section on Page 2-7 should add the following high priority items:

- Increase bus frequencies by prioritizing hiring operators and bus purchases.
- Accelerate shelter deployment program.
- Initiate study of high capacity, high volume transit deployments, especially Buffalo Metro extensions. By planning now we will be ready to deploy when funds are available. This study should prioritize the East Side Airport extension but also include light rail rapid transit (LRRT) extensions to the Highmark Stadium, the Southtowns, the Tonawandas and Niagara Falls.
- Work with NYS CLCPA Climate Action Council to seek funding for transit investments and service improvements as a way to meet the requirements of the CLCPA and associated Scoping Plan (e.g., the Scoping Plan calls for reducing VMT through transit investments and promises to find new sustainable funding sources).

Comments on Selected Budget Items:

Capital Improvements. We are very pleased to see capital funding for rail engineering in the FYE 2025/2026 budget on Page i-15.

We note that NYSDOT and FTA funding for rail engineering is labelled "FUTURE NYSDOT" and "FUTURE FTA." What is the meaning of "FUTURE" on these line items? Does this mean there is uncertainty in this item? Are there still uncertain approvals needed? We assume that once the NFTA and DOT budgets are approved and included in the State budget that the money is allocated, and "FUTURE" goes away. Is this correct?

Similarly, we assume that once the Amherst extension environmental impact statement (EIS) is approved by the FTA, the FTA funding is allocated, and the "FUTURE" label goes away?

We are pleased to see the addition of a new State assistance line item of \$12M for dedicated rail assistance.

We are pleased that shelters continue to be deployed throughout the system, although too slowly. This is an important element in making transit a viable option for everyone, which is key



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to meeting the climate change mitigation goals of the CLCPA law. Until shelters are ubiquitous throughout the system and bus frequencies are 10 to 12 minutes on primary routes and 20 minutes elsewhere, the system will continue to be used almost exclusively by the poor.

The problem with cost share. There will be a significant cost share requirement for the construction of the Amherst light rail rapid transit (LRRT) Extension. The problem is that State and local cost share for transit projects is about 50% while the cost share for highway projects is 20% or less. This high local burden for transit vs. highway continues to make transit projects unaffordable at the local and State levels while encouraging highway projects to move forward. We hope the NFTA will work with CRT to advocate for changing Federal law to make transit cost share at least as low as for highway projects. There is legislation in the US Congress that will do this but only passed in the Senate. Until this injustice is corrected progress on transit projects and meeting environmental goals will be difficult.

There will be a significant cost share for the \$1B Amherst LRRT extension construction once approved. We assume this is 50% (i.e., about \$500,000)? Is this correct? Can the State expenditure during the Amherst extension engineering (\$260.48M) be applied to cover the construction cost share, which occurs later?

Operational Budgets. We have some questions on operational budgets.

The budget overview on pages 1-1 and 1-2 show a Metro surplus of \$4.69M and deficits of that exact amount for both Transportation Centers and Facility & Property Group. Is the Metro surplus making up for the deficit in these business areas? We don't see any interdivision reimbursements that would indicate this. In fact, the Metro budget shows an interdivision reimbursement to Metro of \$236K. We assume this is being transferred to Metro from other departments and that the \$4.69M Metro surplus is available to Metro for hiring more operators and improving Metro service. Is this correct?

Can you help us understand the Inter Division Reimbursement of \$49.40M (9.8%) on the budget overview. The explanation in Section 36 on Page 1-7 says that this is due to non-represented and contractual salaries and fringe benefits. Can you provide more details?

Requests for increased State Transit Operating Assistance (STOA) have been made by CRT and the NFTA to legislators with the stated goal of increasing service levels. STOA has increased significantly in each of the last few years, but bus frequencies have not been increased. We understand the reasons for this are operator attrition and difficulty hiring new operators. How many Metro operators are we still short? We assume that transit service levels will be increased when hiring is successful. Is there an estimate for service level increases (e.g., increased bus frequency) that can be achieved when hiring is successful given the limits of the FYE26 draft budget?



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We are pleased to see that passenger fares have not been increased again this year. This makes transit more affordable. The goal of increased fares should be achieved with increased ridership. Higher fares work against this goal.

Item 29, on page 1-6 says insurance increase is \$2.19M or 25.2% to \$10.9M. What is driving this increase? Given that the NFTA is self-insured, why have costs gone up so much?

Hiring operators and maintenance staff. We understand that the hiring of operators and maintenance staff has been a problem in recent years. We have a suggestion for advertising for new operators. The NFTA can put yard signs at all or selected NFTA Metro stops. With over 5,000 bus stops such yard signs would reach a large audience and target transit users who are disproportionately low income according to the NFTA/GBNRTC surveys. Figure 1 is a FirstStudent advertising sign that was placed at an NFTA bus stop near Larkinville. Are these rates comparable to the NFTA operator rates? We recommend that the NFTA consider putting yard signs at all high-volume bus stops.

Sincerely,

Douglas Funke, President, Citizens for Regional Transit

Cc. Executive Director Kimberley Minkel, Vice President Thomas George, PE, Director Christopher Ruminski, Director James Morrell, Director Darren Kempner, Director Helen Tederous, and Director Chris Fahey



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Attachment 1 Figures



Figure 1. Sign advertising for bus drivers at an NFTA bus stop.



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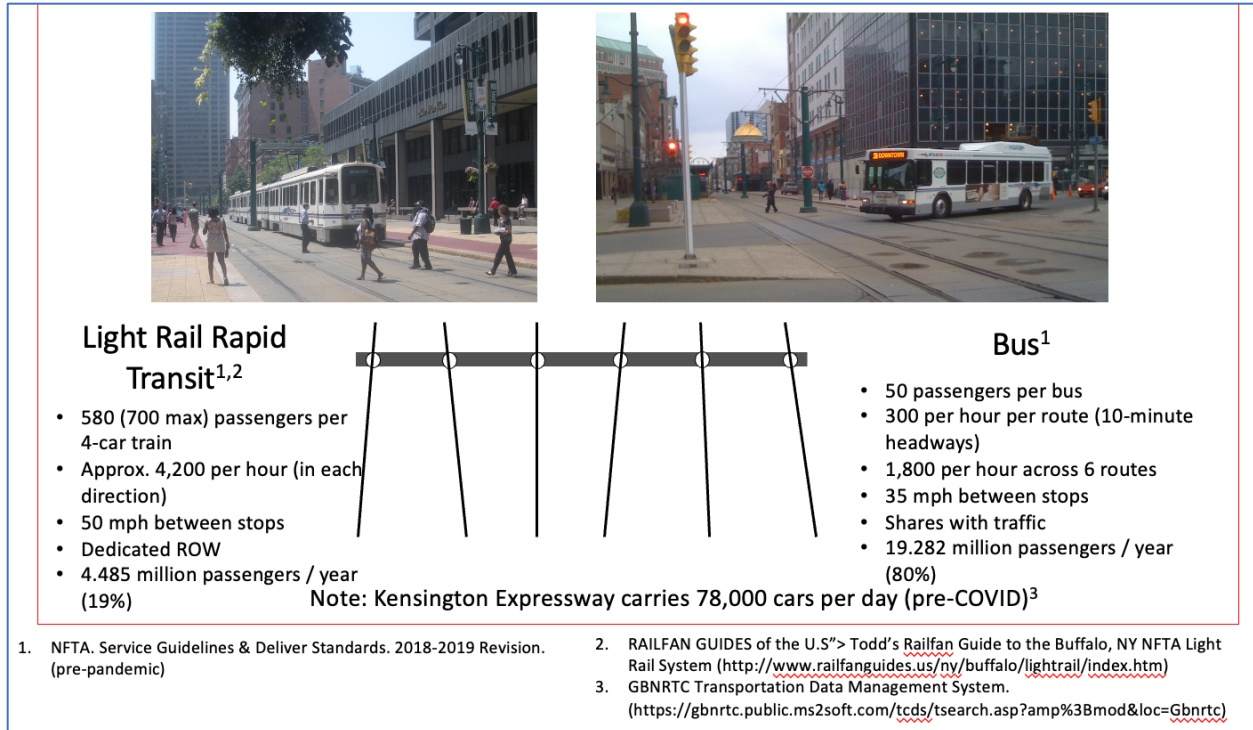


Figure 2. An optimal transit system combines high speed, high-capacity light rail with a high frequency of buses.



Figure 3. Public transit reduces VMT. Every bus can remove all the triangled cars and every Metro Rail 4-car train can remove all cars in this picture every 10 minutes – even the tiny cars in the distance.