



**CITIZENS *for* REGIONAL TRANSIT**

617 Main Street, Suite #201, Buffalo, NY 14203  
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1 December 2022

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 2023-2024 draft budget. We are appreciative that the draft budget document was made available electronically again this year per our request in 2021. This makes our review a lot easier than having to go physically to the library as in prior years.

We are very pleased to see significant transit capital investments planned, especially Buffalo Metro extensions (DL&W and Amherst), Bailey Corridor bus rapid transit (BRT), bus shelters, and related transit enhancements (e.g., the Division Street Linear Hub, electric bus infrastructure). We are pleased that near-term improvements are funded (e.g., rail extension study /engineering) and that expected future funding sources for longer-term improvements are identified. While we continue to be concerned about the FTA's insistence that we reevaluate BRT for the Amherst extension, we believe it will quickly become obvious that BRT cannot meet the capacity requirements for connecting the UB campuses and that BRT would create a barrier to disadvantaged city residents seeking access to employment and education opportunities available in Amherst.

We continue to believe that the East Side / airport extension is the next priority after the Amherst extension and hope that evaluation of this extension is part of the planned rail extension study. As the NFTA Erie County Transit Service Restructuring and Fare Study–Strategic Assessment of 2010 noted, while the Amherst extension offers the best return on investment based on ridership, the East Side / airport extension provides the best opportunity for “development potential”. We also believe that the new planned study should evaluate the potential for connecting to the new Bills Stadium, especially considering the environmental requirements of the NYS Climate Leadership and Community Protection Act (CLCPA), now signed into law (described below).

The NYS CLCPA law requires NYS to reduce CO<sub>2</sub> emissions by 30% by 2030 and 85% by 2050. The associated draft NYS Scoping Plan for meeting the CLCPA requirements calls for significant improvements and investments in public transit. The related Erie County Climate Action Plan (<https://www3.erie.gov/climateaction/what-ecca>) specifically calls for extensions to Buffalo Metro and improvements to transit more broadly. For example, this plan calls for reducing vehicle miles traveled (VMT) by enabling and encouraging a shift to other modes, especially



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transit. The NYS draft Scoping Plan calls for new revenue sources to support enhanced transit deployments and operations. The NFTA should be preparing for implementing the needed transit investments and improvements.

We are very pleased that the NYS Transit Operating Assistance (STOA) is up 15%. Citizens for Regional Transit joined the NFTA on the New York Public Transit Association (NYPTA) led efforts to advocate for this increase – visiting with legislators, writing letters, speaking at a NYPTA advocacy event. This STOA increase is needed to compensate for reduced ridership following the COVID pandemic and expected reductions in Federal COVID relief in the near-term, and for establishing funds for more frequent transit service as ridership returns to pre-pandemic levels and exceeds these levels when transit service improves.

Again this year, we strongly commend and support the NFTA’s mission of “... *providing the highest level of safe, clean, affordable, responsive and reliable transportation through a coordinated and convenient bus and rail system*” (budget front matter and Page 2-3) and goal of “*achieving a reputation as the best transit system in the United States*” (page 2-3). We support Tom George’s benchmarking work vis-à-vis other transit agencies as one tool for identifying areas for improvement and look forward to helping identify and prioritize needed improvements. But more is needed beyond just high-level comparisons to other transit agencies. We believe the NFTA mission and goal statements need to be defined more objectively in terms that relate to specific performance measures. Without specifics to strive for the mission and goal statements become just rhetorical platitudes. We suggest that the recently updated *NFTA-Metro. Service Design Guidelines & Delivery Standards – 2021 Revision* be modified to include more specific performance objectives. As frequent bus and rail riders, CRT is in a strong position to help define optimal and objective service levels and we look forward to working with the NFTA in doing so.

We look forward to working with the NFTA to improve Western NY transit and to advocate at local, state, and federal levels for the needed funding and support. See attachment for specific questions.

Sincerely,

Douglas Funke  
President, Citizens for Regional Transit

Cc. Executive Director Kimberley Minkel, Vice President Thomas George, PE, and Director Darren Kempner



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**Attachment  
Detailed Comments and Questions**

As in previous years, we have some questions that relate to details of the budget. Rather than burden the budget public hearing with these questions, we have included them below. This year only 2 questions. Also, please provide any comments or clarifications you think are relevant to the above comments.

1. Page 2-93. We note that capital outlays for diesel buses continue beyond 2028. This is disappointing. We thought we would be phasing out diesel buses in favor of electrics more quickly. Are we correct that all buses will eventually be electric? What is the timeframe for achieving this?
2. The funding sources on Page 2-111 shows \$176,499 source as "Private". What is the private source?