



**CITIZENS *for* REGIONAL TRANSIT**

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

5 February 2022

617 Main Street, Suite #201,  
Buffalo, NY 14203  
e-mail: [president@citizenstransit.org](mailto:president@citizenstransit.org)  
Phone: 716-691-8528

Region 2 Office  
Federal Transit Administration (FTA)  
One Bowling Green, Room 428  
New York, NY 10004

Re: Justice40 and Buffalo Metro Rail Extension Project

Dear FTA Region 2:

Citizens for Regional Transit (CRT) would like to clarify our support for extending Buffalo's Metro Rail Project. Currently, the FTA area 2 is the lead agency for this project. FTA DEIS comments closed October 14, 2021. Five days later, the FTA announced the Justice40 program at the Rail-Volution conference.

CRT strongly endorsed the Locally Preferred Alternative submitted by the NFTA and is currently being considered by the FTA for approval. We believe at this juncture, the FTA should approve the project as submitted. However, we understand that the FTA may deny approval, or offer to approve alternatives such as bus rapid transit (BRT) or a less expensive LRRT alignment.

We want to make our priorities clear. We strongly oppose any BRT option because BRT is infeasible due to capacity and congestion issues and because it does not meet the Justice40 goals, as described in the attached document.

We strongly support any light rail rapid transit (LRRT) option that provides a "one-seat ride" by extending Buffalo's existing Metro Rail subway between the University at Buffalo South Campus LRRT station and the UB North Campus.

If FTA engineers were to determine that the proposed Niagara Falls Boulevard alignment is not optimal or find that a different alignment on Bailey Avenue or Millersport highway better meets the FTA Justice40 goals, we will still support that option as long as it offers a "one-seat-ride" and can be completed within the original schedule.

Our largest concern is that the FTA move quickly and announce its choice so that LRRT groundbreaking occurs by mid 2024, before the elections. Buffalo is represented by Senate



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Majority Leader Chuck Schumer, who worked very hard to get the infrastructure bill passed into law. We hope that his hard work is not in vain when it comes to this project.

Thank you.

Sincerely,

Douglas Funke  
President, Citizens for Regional Transit

Cc.: Thomas George, P.E., Director of Public Transit, NFTA; Hal Morse, Executive Director,  
Greater Buffalo Niagara Regional Transportation Council (GBNRTC)