



7 December 2023

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 2024-2025 draft budget and associated strategic Roadmap. We thank the NFTA for making the draft budget 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 and copy selected pages as in prior years.

We believe we are at a critical juncture regarding transit and transit funding. Improvements in transit are needed more than ever but transit budgets are tight and funding sources are uncertain.

The Need:

NYS and World leaders have recognized the existential threat of climate change and made promises and commitments to address it. Transportation is one of the largest sectors contributing greenhouse gases (GHG) that are causing the climate problem. Because cars are the biggest GHG contributor within the transportation sector and public transit offers a much less polluting alternative, adequately funded transit is needed to provide a viable and attractive alternative to driving.

The alarming growth in human-generated CO₂ in the atmosphere has prompted leaders to act.

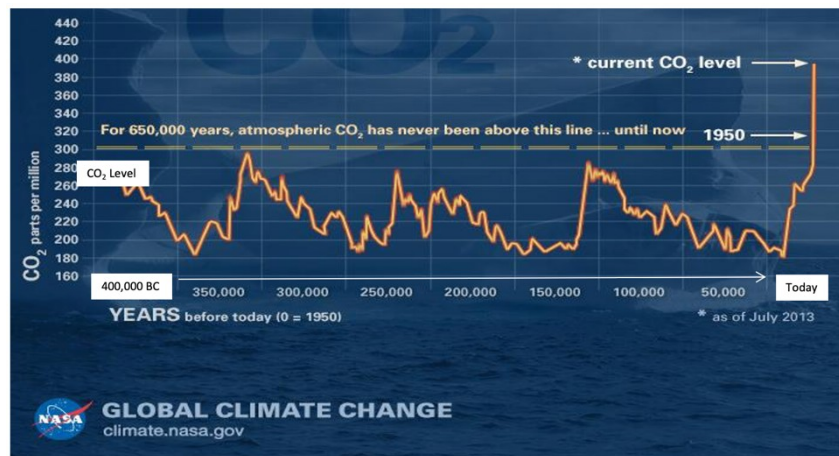


Figure 1. Climate change is an epochal problem and directly related to GHG emissions.



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The NYS Climate Leadership and Community Protection Act (CLCPA) is now NYS law and calls for GHG reductions of 40% by 2030 and 85% by 2050. It also requires that 40% of CLCPA-driven investments go to disadvantaged communities, like Buffalo’s transit-reliant communities. The CLCPA and the associated Scoping Plan and Erie County Climate Action Plan (ECCAP), all call for:

- Increasing transit service hours, routes, and frequency.
- Increasing high-capacity public transit systems (like Metro Rail).
- Reducing vehicle miles travelled (though improvements in public transit and other modes).
- Establishing sustainable funding sources for transit (e.g., variable parking pricing, new vehicle registration fees, mileage-based user fees).

All NYS agencies and projects are required to follow the mandates of the CLCPA and local derivative plans like the ECCAP. The chart below makes clear how important reductions in transportation emissions will be in meeting the CLCPA requirements and the role of reducing light duty vehicle miles traveled.

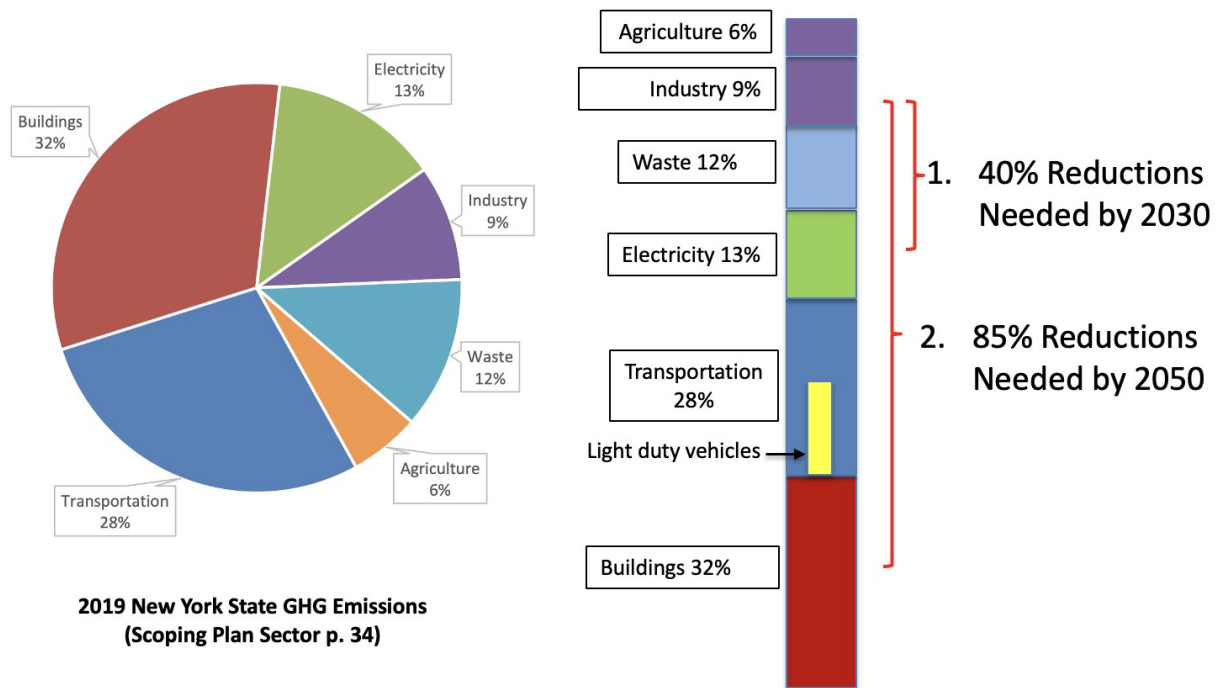


Figure 2. Public transit is critical for meeting the CLCPA GHG reduction requirements.

Neither the NFTA 2024-2025 draft budget or the associated strategic Roadmap mention the CLCPA or associated plans. They should. Meeting transit components of the CLCPA requirements should be included as an NFTA strategic priority and be reflected prominently in



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the budget planning process. The NFTA budget should include budget resources for achieving these transit needs.

The Opportunity:

This year NFTA State budget requests are backed by State law (the CLCPA) and there is Federal funding available (the Bipartisan Infrastructure law, BIL). The CLCPA requirements should be emphasized in all requests and discussions.

Public transit is the best way to reduce VMT and therefore reduce GHGs. Every bus can remove all the cars with red triangles and every Metro Rail 4-car train can remove **All** the cars in this picture every 10-minutes! It's time to make this happen. This means expand the strategic priorities to include building the foundation for additional Metro Rail extensions, not just Amherst, the DL&W, and Bailey BRT.



Figure 3. Public transit reduces VMT. Metro Rail can remove all cars in this picture every 10 minutes. Each bus can remove the triangled cars.

The strategic priority in the Roadmap under the “Ensure Financial Stability and Resiliency” section that says: “scale Metro Service to match available funding.” Metro service should be driven by need and the NFTA mission, not funding availability. This strategic priority should be changed to say something like: “Define Metro service based on meeting community transit needs and the NFTA mission.” When funding shortfalls occur, the reasons should be made clear to planners and legislators so work to close funding gaps can be undertaken.

At Senator Kennedy’s urging, Darren Kempner - Director, Government Relations & Development is proposing to obtain State funds for studying the East Side Airport Extension. This is an important element for moving forward, which CRT endorses and, which should be



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listed with the “Foster Economic Development” action items” on Page 21 of the NFTA Roadmap.

There is much debate about the Kensington Expressway Project and whether it should be filled in to restore Humboldt as a surface parkway. One argument for eliminating the highway, in addition to reconnecting Buffalo’s East Side communities, is reducing overall VMT to help meet the CLCPA requirements, Which Citizens for Regional Transit (CRT) also endorses. Reconfiguring Route 33, if done, will increase the need for extending Buffalo Metro and the NFTA needs to be ready. While Buffalo’s arterials can handle the Kensington traffic in the near term, a better alternative will be extending Buffalo Metro. A single Buffalo Metro extension can carry all people now using the Kensington Expressway, even during peak rush hour. Since some will still drive, this will create a balance with unclogged roads and fast Metro Rail options. Unfortunately, CRT does not see in this draft budget where funds are being committed to advancing the next phase of extending the Buffalo Metro.

Some budget specifics:

We are pleased to see that the State Transit Operating Assistance (STOA) is being increased another 15% over prior increases. This money should be used immediately for increasing transit frequency toward the goal of 10-minute headways on high priority routes and 15 to 20 minutes on suburban routes. Increases in frequency on weekends and evenings should also be achieved to the extent possible.

But STOA is by far the biggest funding source for NFTA operations. This is concerning because when the State experiences a funding downturn, transit could be cut. We recommend adding more reliable and sustainable sources to the mix as called for by the CLCPA. There should be a more balanced approach, perhaps some of the ideas in the CLCPA Scoping Plan noted above. This is part of the CLCPA plan to identify other revenue sources. The NFTA should be ready to move to improve service when these sources are identified.

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.

Sincerely,

Douglas Funke
President, Citizens for Regional Transit

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