

Public Comment by Citizens for Regional Transit

February 5, 2024

Re: DRAFT UNIFIED PLANNING WORK PROGRAM (UPWP) STATE FISCAL YRS 2024-2026

AGENCY: GBNRTC

DESCRIPTION: MPO PLANNING PRIORITIES AND ACTIVITIES

Introduction

This document contains comments on the UPWP from Citizens for Regional Transit (CRT). This year's UPWP demands comprehensive, broadly focused priorities that go beyond those used in prior years. The car-focused priorities that have characterized transportation solutions in the past will not work in meeting today's climate and social equity priorities. UPWP plans must embrace multimodal solutions and enable decisions and investments that support the needed transportation changes. These new priorities are well-characterized in the UPWP Planning Emphasis Areas (PEAs). But just stating the PEAs as broad goals in the beginning is not enough. They need to be carried throughout the document and considered in each and every UPWP plan and project.

CRT encourages a region-wide comprehensive planning approach. While the draft UPWP generally considers region-wide planning, specific projects often overlook regional PEAs-based considerations. Project planning that does not consider factors beyond a specific project area's boundaries is inadequate and may not meet the needs of our region and the goals captured in the PEAs. We are pleased that important considerations such as the climate crises and traffic congestion are framed regionally, but the draft raises concerns that when planning specific projects, regional solutions and PEAs-based goals are ignored or diminished.

CRT generally supports all the initiatives contained in the draft. Some are exceptionally good, but some need improvement.

Planning Priorities

Among the exceptionally good is the list of planning priorities. We are very pleased that Metro Expansion Project is at the top of the list and is followed by regional priorities that will move us toward comprehensive 21st Century transportation solutions.

The most important planning priority is Metro Rail Expansion. Expansion to Amherst is the first step but the long-range goal should be a fully expanded system with the high capacity, high speed Light Rail Rapid Transit (LRRT) forming a hydro-powered regional transportation spine as originally planned. We ask that plans be added for studying potential

Metro Rail expansion projects from the Downtown Central Business District east toward the Airport and south to the new Bills stadium.

Go Buffalo Niagara Support and Oversight

We quote the draft document (p 28):

“Implementation of the Go Buffalo Niagara Program (www.gobuffaloniagara.org), strategies and coordinating investments to enhance traveler opportunities to walk, bike, take transit, share rides, and telecommute provide additional solutions to system capacity issues; while helping create a balanced, efficient, multi-modal transportation system that promotes choices and influences demand to reduce single-occupant vehicles (SOV) trips; increase in the use of alternative travel modes; more efficient parking utilization; a reduction of vehicle miles traveled (VMT); and/or reduction of emissions.”

CRT believes this statement should be adopted as a key operational goal for everything the GBNRTC does rather than just for Go Buffalo Niagara. This is especially important because these goals are central to meeting the requirements of the State of NY Climate Leadership and Protection Act (CLCPA) and the Erie County Climate Action Plan (ECCAP) and the UPWP PEAs.

Smart Cities Next Generation Adaptive Signals and Technology

CRT believes establishing connectivity to traffic signals in the region is one of GBNRTC's most important long-range projects. It is a topic that the public seems oblivious to. Great strides have already been made to deploy Miovision and coordinate it with existing technologies. This is a topic that the GBNRTC and municipalities should promote. It is a big win for everyone, yet hardly anyone knows about it. Whenever CRT mentions this topic, people are very excited and want to know more. Frequent updates on deployment would generate goodwill for all entities affected. Miovision will help move traffic more efficiently enabling desired road diets and benefitting cars and buses alike.

Bi-National Transportation Integration

This is a difficult, yet critical topic for Western New York. CRT applauds the GBNRTC for keeping this in the plans and offers any support we can provide to help break down the barriers that increase costs for travelers and hurt tourism. Progress in resolving the difficult border crossing impediments must continue to be pursued.

Bailey Avenue Project Support

CRT has been following this project and fully supports the Bailey Avenue Bus Rapid Transit (BRT) initiative. CRT supports BRT where it can provide cost-effective real benefits, such as increasing bus frequency, efficiency, and priority like in the Bailey Avenue corridor.

Regional Travel Demand Modeling

Quoting the draft (p 40)

“Staff time is reserved in this work element for emerging issues and simulation utilizing the regional model for potential projects by member agencies as they are identified in the two- year work program period. These include traffic management during projects being implemented as well as analyses of potential project alternatives.”

In the past few weeks, CRT has witnessed frustrated citizens having to use FOIL requests to obtain publicly owned traffic modelling data that should be freely available. CRT suggests the GBNRTC consider enacting policies whereby the GBNRTC automatically publishes all data and analyses provided to member agencies.

Further, when it is obvious previously studied NFTA alignments for LRRT are likely to affect the outcome of traffic study results, the GBNRTC should urge the member agency to include modeling for LRRT or provide a statement that consideration of LRRT may affect traffic study reports. This is an important way the UPWP Planning Priorities and PEAs are considered in all transportation (and especially highway) projects when planned.

Rail Passenger Initiatives

The staggeringly slow progress on this initiative speaks volumes to the Governor’s lack of interest in this topic. CRT is glad this is on the docket but would like to see it given higher priority by the State. This work should include expediting the building of a second rail line along the Niagara section of the AMTRAK alignment and prioritizing the building the long-planned AMTRAK maintenance facility in Niagara Falls. This facility would be built on State-owned land for a very affordable price and is critical for supporting long-term AMTRAK WNY service.

ITS4US Phase II and III

ITS4US and the traffic light coordination project share something in common. These are projects that are important, exciting, and tremendously good for the region, yet hardly anyone knows about them.

ITS4US is a program CRT heartily endorses.

Metro Transit Expansion Project

CRT is delighted that the Amherst extension project is moving forward but is dumbfounded that the BRT alternative is still on the table. While CRT wholeheartedly supports extending Metro Rail to the Amherst corridor, we strongly oppose BRT as something that has been tried and proven a complete failure for the Amherst corridor. It is such a bad idea we wonder how or why this is even being talked about. BRT can be very beneficial when deployed where it can do good. BRT for this corridor will cost more over time than LRRT and be worse than doing nothing (i.e., keeping the Stampede).

CRT eagerly awaits the Environmental Impact Statement (EIS) and public comment period for this project.

Exit 50 (I-90/I-290/Rt 33 Interchange) Planning and Environmental Linkage Study *New Task*

This study area is over capacity and congested. It has a high accident rate. CRT agrees that a study is justified. The study should consider the impact of LRRT expansion in addition to highway fixes.

If LRRT is chosen for the Amherst Metro Transit Expansion project, it will attract riders who would otherwise drive through the Exit 50 study area. CRT believes Amherst LRRT deployment will reduce demand somewhat in the Exit 50 study area. The effect won't be dramatic, but it will be measurable and should be included in the study.

CRT believes extending Metro Rail from Buffalo's Central Business District through the East Side to the Airport and Lancaster on existing NFTA owned right-of-way would have a dramatic effect on congestion in the Exit 50 study area. CRT believes having LRRT as a highway alternative has the potential to eliminate congestion in the Exit 50 study area. This potential LRRT extension should also be included in the study.

Unless the Exit 50 study includes measuring the potential effects of both Amherst and Airport LRRT extensions on the study area, the study should not be undertaken.

Route 5, Ridge Road to Route 75 Interchange, Planning and Environmental Linkage Study *New Task*

As with the Exit 50 study, CRT believes it is imperative that LRRT alternative transportation be included in the traffic and environment study. Potential reduction of traffic volume due to LRRT should be taken into consideration. Route 5 might be able to have a road diet if some of the traffic were off-loaded to LRRT.

Not mentioned in the draft UPWP is the Skyway bridge removal project. The Skyway is another highway bridge that has passed its useful life expectancy for which NYS DOT has proposed an expensive work-around making a new street parallel to Tiff St connecting Fuhrmann Blvd to I-190. The same LRRT line that would provide an alternative for the Ridge Road to Route 75 Interchange would provide an alternative for the Tiff

Street/Skyway bridge corridor, yet nothing has ever been said about how LRRT could serve that corridor and eliminate the need for expensive, highly polluting highway projects. It should be included in the study.

CRT Suggested study:

Buffalo Central Business District to the New Bills Stadium *New Task*

CRT believes that it is important to add this study to the UPWP because implementation of LRRT in this corridor directly affects the Route 5, Ridge Road to Route 75 Interchange, Planning and Environmental Linkage Study. Such a study would be driven by application of the UPWP PEAs.

CRT Suggested study:

Buffalo Central Business District to the Buffalo Airport and Lancaster *New Task*

CRT believes that this is another important study to add to the UPWP because it directly affects the Exit 50 (I-90/I-290/Rt 33 Interchange) Planning and Environmental Linkage Study. Such a study should be driven by application of the UPWP PEAs.

CRT Recommends Taking a Comprehensive, Regional Approach

CRT believes the following projects are interrelated and should be considered from a regional perspective.

Region Central Implementation

The Region Central plan put forward for NY-198 between I-190 and East Delavan Avenue should be advanced forward into construction by NYS DOT as soon as possible, but with consideration for the possibility of reconnecting Delaware and MLK parks with a full restoration of Humboldt Parkway. This project should be included in the UPWP.

NY-33, Kensington Expressway, Humboldt Parkway Restoration

No mention of this project is made in the UPWP. This is a glaring omission. There have been many calls from the public that GBNRTC should take over planning of this project from NYS DOT for the same reasons why GBNRTC was tasked to plan Region Central. NYS DOT has kept the planning on this project undercover for more than a decade while trying to drum up support for their expensive highway reconstruction project featuring a tunnel and cap on a portion of the Kensington Expressway. The NYS DOT plan will leave

the expressway south of Dodge and north of Sidney unimproved and will fail to reduce pollution in direct violation of the NYS Climate Leadership and Community Protection Act (CLCPA) law. CRT is among the many organizations calling for GBNRTC to be the planning agency, rather than NYS DOT, which focuses exclusively on highways and car-based highway level of service (LOS) without meaningful consideration for the larger needs of the City of Buffalo's East Side. A public / community – driven approach should be accomplished like was done on the Region Central Project.

Rebranding

CRT supports the initiative to rebrand.

Sincerely,

Douglas Funke
President
Citizens for Regional Transit