CITIZENS *for* REGIONAL TRANSIT
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September 8, 2025

Mr. Jeffery Amplement
Project Manager
Niagara Frontier Transportation Authority (NFTA)
181 Ellicott Street
Buffalo, NY 14203
(transitexpansion@nfta.com)

Ref: Buffalo-Amherst-Tonawanda Corridor Transit Expansion Project. Draft Environmental Impact Statement (DEIS) and Draft Section 4(f) Evaluation.

Dear Mr. Amplement:

Citizens for Regional Transit (CRT) strongly endorses the NFTA's plan for extending Buffalo Metro Rail light rail transit (LRT) to Amherst as documented in the second Draft Environmental Impact Statement (DEIS) of the Buffalo-Amherst-Tonawanda Corridor Transit Expansion Project. The LRT alternative is far superior to the bus rapid transit (BRT) alternative and to the do nothing alternative. In fact, only the LRT fully satisfies the stated project purposes, goals, and objectives.

Citizens for Regional Transit has evaluated the three alternatives in the DEIS of July 25, 2025. Our evaluation of the three proposed alternatives is as follows:

- No Build Alternative (DEIS Section 2.2.1) – Not Satisfactory
- LRT Build Alternative (DEIS Section 2.2.2) – CRT supports the LRT option
- BRT Build Alternative (DEIS Section 2.2.3) – Not Satisfactory

We also have comments in response to public inputs on the DEIS. These are presented at the end.

CRT finds the new 2025 DEIS to be a well-written, professionally prepared, comprehensive presentation. Collaboration with the Federal Transit Administration as co-lead agency has resulted in a DEIS of exceptionally good quality. Each remediated topic addresses the concerns and objections expressed during the first public comment period beginning March 2, 2020 and during subsequent NFTA listening sessions. It is readily apparent that public comments were listened to and addressed

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in a way that alters the project for the better in this new 2025 DEIS. CRT commends the NFTA in allowing public comments to improve the project. Thank you for considering our comments. We look forward to working with the NFTA to implement the LRT extension.

Sincerely,

Douglas J Funke

Douglas Funke
President, Citizens for Regional Transit

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Comments on the NFTA Draft Environmental Impact Statement (DEIS) Buffalo-Amherst-Tonawanda Corridor Transit Expansion Project Citizens for Regional Transit

8 September 2025

1.0 Evaluations

Here's how the alternatives meet the Buffalo-Amherst-Tonawanda Extension Project purposes and needs.

Table 1. How the project alternatives meet project purposes and needs

Project Purpose	No Build	BRT	LRT	Comment
Improve mobility along the Project Corridor by increasing transportation options throughout the greater Buffalo region.	Fails	Fails	Good	With buses there will be a barrier at University Station requiring mode switch.
Better connect the three UB campuses by providing improved mobility that includes a "one-seat-ride" between campuses without requiring a transfer.	Fails	Fails	Good	No improvement provided by BRT and no build. Only LRT provides a seamless "one-seat-ride."
Improve operating efficiency of the transit network by providing convenient and seamless connections for transit patrons between activity centers and competitive travel times.	Fails	Fails	Good	No improvement provided by BRT and no build.
Support local and regional land use planning and transit-oriented development as	Fails	Poor	Good	Prospects of LRT is already stimulating interest in TOD investments (e.g.,

outlined in the NFTA/GBNRTC TOD plan.				Boulevard Mall, LaSalle Station, and several mixed-use projects)
Provide mobility options by serving transit-dependent populations, thereby improving opportunities for participation in the regional workforce and overall economy.	Poor	Poor	Good	UB Amherst campus is a major employer in the region. Better transit service is needed. Transit dependent populations are too often overlooked in investment decisions.
Help relieve parking constraints and capacity issues on the BNMC, UB campuses, project corridor, and downtown Buffalo, and minimize traffic and parking-related impacts on neighborhoods.	Fails	Fails	Good	Only the LRT alternative provides significant reductions in vehicle miles traveled and related parking demand.
Improve service for transit-dependent populations	Fails	Fails	Good	Only the LRT alternative improves service for people with disabilities by eliminating the transfer barrier and providing service equality.

Note that the 2010 Metro updated Strategic Assessment compared several alternatives for major transit expansions. The study ranked the Northeast to Amherst / UB North Campus expansion highest in terms of ridership.

Here's more detailed discussions of how each alternative meets project goals and objectives.

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1.1 No Build Alternative – Not Satisfactory

The current transit options in the project area are inadequate. There is an infrequent NFTA bus #44 plus a private service operated by the University at Buffalo called the Stampede which has peak hour headways of just 3 minutes, yet it still can't meet peak demand.

Even with 3-minute headways large numbers of students are unable to board jam-packed buses and must wait for the next bus. Because the service operates in mixed traffic, bus bunching occurs daily, and schedules cannot be met. The university has already implemented many aspects of Bus Rapid Transit (BRT). NYS DOT has optimized the traffic signals for bus service, but it is impossible to provide bus priority beyond a certain point without causing catastrophic congestion at cross streets.

The University at Buffalo had planned to convert their Stampede fleet to all-electric buses but could not afford the price tag and have retained environmentally unfriendly diesel-powered buses. The University's Stampede service has been cut back due to operator shortages even though enrollment is at a record high of more than 30,000 students. This is a very bad situation for the students and the University putting future growth of the University at risk.

The No Build Alternative maintains a blockade of transit users underground at University Station on the University at Buffalo South Campus forcing riders to transfer between subway and bus. This transfer effectively eliminates public transit as a viable alternative to connect UB North and the City of Buffalo for most transit users. Neither the no-build alternative nor the BRT alternative is ADA compliant.

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1.2 LRT Build Alternative – CRT supports the LRT option

1.2.1 Meeting Project Goals

CRT believes Light Rail is the only option that meets the project goals. This is clear from review of the comprehensive tables in Chapter 6 of the DEIS. Only LRT satisfies the following project objectives:

- Develop cost-effective attractive high-quality transit service connecting Buffalo with Amherst and Tonawanda – the LRT attracts 30% more riders than BRT and avoids a time-consuming mode change at University Station (switching between surface bus and underground train.) The light rail option leverages the existing Metro Rail system making it the most cost-effective alternative.
- Mitigate growth of traffic congestion on study area roadways – LRT reduces automobile miles travelled in the region significantly. Train capacity is over 500 people every 10 minutes, compared to 60-passenger articulated buses that we believe are unsuitable for ice and snow. These buses will get stuck in traffic on Main Street and Kenmore Ave.,
- Improve the accessibility of transit in the study area. Only LRT meets the objectives (increase transit options for travelers, improve connectivity, increase access to jobs, education, medical services, etc.) under this goal.
- Increase the effectiveness of the regional transit system. The LRT option doubles system ridership and therefore system revenue. Most importantly, only LRT builds on the investment of the original Metro Rail system, while the other options fail to take advantage of our existing high-capacity transit resource.
- Support sustainable economic growth in the study area (and beyond.) Amherst is already seeing interest in developing the old Boulevard Mall property, as well as "transit-oriented development" around existing stations on Main Street like the privately funded mixed-use development planned for LaSalle Station in the City of Buffalo.
- Avoid or minimize adverse community and environmental impacts. NYS's new environmental laws and the Erie County Climate Action Plan call for improvements in public transit, especially high-capacity public transit. Few cities have a light rail system that can be expanded expeditiously at low cost using existing clear public rights-of-way. Buffalo has this advantage.

The list of benefits from an LRT project include better access, increased ridership, reduced pollution, increased Transit Oriented Development, and lower long-term costs than BRT and Do Nothing options.

1.2.2 Building a Foundation for the Future.

Extending light rail to Tonawanda and Amherst is an important step toward achieving the original vision for a 43-mile Light Rail Rapid Transit (LRRT) System. So far, Buffalo Metro Rail covers 6 miles. The Amherst extension adds 7 miles, doubling both distance and ridership.

Other extensions are planned. A new extension into the old DL&W Terminal will open soon! This indoor DL&W station will include a covered walkway to KeyBank Center, a large attached outdoor entertainment space. An indoor retail market area is planned for the second floor.

The NFTA's long-range plans call for evaluating other system extensions in 2028 when Buffalo-Amherst-Tonawanda extension construction begins. The Buffalo-Amherst-Tonawanda extension expands and strengthens the foundation for a full system. The Buffalo-Amherst-Tonawanda extension is the next step for extending Buffalo's high-capacity transit system. This moves metro Buffalo area toward a system that serves the whole region – including future expansions through Buffalo's East Side to the Airport, to the new Buffalo Bills Highmark Stadium, and connecting with Niagara Falls.

1.3 BRT Build Alternative – Not acceptable

We find that BRT is not acceptable for several reasons.

BRT does not have the necessary capacity. Currently, UB's Stampede BRT is running 3-minute headways during peak times and can't keep up with demand. The NFTA's proposed articulated buses with 5-minute headways will still not be on time due to delays caused by running in traffic and stopping for large intersections.

Not enough operators. Both the NFTA and UB struggle to find enough operators. This problem will be even worse with the larger number of operators required to drive BRT buses versus the smaller number of operators needed for Light Rail.

Higher operational costs. The costs of the additional operators for BRT vs. LRT and the short lifespan for buses compared to trains will make long-term operational costs higher for BRT than LRT.

Problems in snow and ice. Articulated buses can have problems operating in snow and ice. We have videos of articulated buses getting stuck and spinning out of control under these conditions.

The BRT capacity inadequacy has made Bogota, Columbia, the "gold standard for BRT," regret the decision to not make the investment in light rail.[1]

BRT fails to accomplish a "one-seat-ride." Having to transfer at University South Campus station adds an unacceptable time penalty. This is an acute problem for people with disabilities. There is no benefit if a "one-seat-ride" can't be obtained.

Even with electric buses, neither University at Buffalo nor the State of NY can meet climate action goals. PFAS from tire wear and tire disposal are environmental hazards that technology has not yet solved.

2.0 Addressing public complaints about the DEIS.

2.1 Operational Noise

CRT's 2020 comments noted that noise concerns were voiced by some citizens in the project area. For 2025, CRT used both cell phone and dedicated decibel meters to measure the noise currently produced by Metro Rail trains. Our testing results are consistent with the results in the DEIS. Except for very brief moments during braking operations, Metro Rail is consistently around 70db, which is the same as human voice levels during ordinary conversation. Noise from Metro Rail is considerably below that generated by loud cars, motorcycles, and trucks.

CRT regularly attends meetings at our address in Buffalo Place at 671 Main Street on the Metro Rail above ground section. This location is directly alongside the portal where noise and vibration are the loudest. The building is old and has little insulation. The meeting room is less than 50 feet from the LRRT portal, yet transit operations are indiscernible there. Shea's Buffalo theatre and AMC Market Arcade theatre are just

[1] The Bogotá Metro: Necessary Upgrade, or Looming Disaster?

steps away from the transit line and there is no sound or vibration from transit operations detectable in these locations.

Standing on the sidewalk at the portal even when the train horn sounds, the noise level on the sidewalk hovers around 70db. The DEIS promises that other warnings will replace sounding of the horn at the new portal on Niagara Falls Blvd. The DEIS explains other noise reduction strategies with track construction and train car modifications, which we think more than offset any noise concerns.

CRT thinks the potential problems from noise and vibration have been hyped beyond what is reasonable.

2.2 Construction Noise

The new DEIS goes into detail concerning steps contractors will take regarding hours of operation and noise abatement procedures that must be followed. In the DEIS, particular attention is paid to noise from the limited blasting areas. CRT recognizes that some property owners are likely to hear blasting noises. The noise will be of limited duration and minimized using state-of-the-art blasting techniques.

The remediation steps in the DEIS for all forms of construction activity is satisfactory to CRT.

2.3 Construction Vibration

2.3.1 Niagara Falls Boulevard and Kenmore Ave Vicinity

Residential property owners near the intersection of Niagara Falls Boulevard and Kenmore Avenue expressed concerns that their basements and foundations would be subject to damage during blasting operations. Since the 2020 project introduction it was determined that blasting will not be required at this intersection. Blasting will be limited to just 2 blocks of Kenmore Avenue near Main Street with additional blasting under a parking lot on the UB campus. Cut-and-cover will be used for the underground portion most of the way between Main Street and the portal at Kenilworth Avenue on Niagara Falls Boulevard.

The DEIS addresses noise and vibration concerns and offers concerned property owners in the immediate vicinity the opportunity to have before and after property inspections.

2.3.2 Walton Woods Vicinity

Walton Woods is an area having clay soils. During periods of drought, poured concrete foundations and basements often crack and fail. This problem became newsworthy in 1991.[2] By 2003 more than 1,000 homeowners reported foundation and basement failures causing financial pain and mental anguish in the Town of Amherst.[3] A 2004 news report notes that it was known in 1986 that soil conditions in Amherst are problematic, requiring special construction techniques. Homeowners sued the Town of Amherst for allowing construction knowing that problems would likely occur, but they lost that lawsuit.[4] They were also unsuccessful suing the builders who built homes with inadequate foundations and/or on sites unsuitable for houses.

The US Army Corps of Engineers released a report in 2005 blaming poor soil conditions for sinking homes in Amherst.[5] "The cost to repair a collapsed basement foundation in Amherst, NY, will likely range from $20,000 to over $100,000"[6] "…Some beleaguered homeowners have simply surrendered, abandoning homes and mortgages."[7]

The DEIS does not consider whether the soils in the project area can sustain the weights and load from Light Rail construction and operations. CRT recommends that NFTA should ensure that the soil can handle these loads and mitigate where necessary.

At the August 19, 2025 public hearing residents of Walton Woods area repeated several points. Most important was the proclamation that every resident of the Walton Woods area has at least one car and most have two or more cars. They don't want rail. They don't want bus. The only acceptable form of transportation for them is by car. If you can't afford a car, you should not be in the neighborhood.

The idea that anyone from their community would ever ride public transit was foreign to them. The disrespect shown to transit riders was appalling. Yet most objectors

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[2] Dry Period Blamed For Cracks In Foundations, Basements Problems Surface In Amherst, Town Of Tonawanda, The Buffalo News, 9/21/1991.
[3] Over 1,000 homes sinking, Amherst official tells state after the town downplayed the scope of the problem for months, the building chief cites residents' 'financial pain and mental anguish' in pushing for new standards, The Buffalo News, 12/12/2003
[4] Soil Boring Tests In Amherst May Further Concerns, By Lee Chowaniec, SpeakupWNY.com, Feb 20, 2004
[5] Army Corps Report Finds Poor Soil to Blame for Amherst Sinking Homes, Buffalo Toronto Public Media Published April 21, 2005
[6] Google AI result from query "How Much Might It Cost To Repair A Collapsed Basement Foundation in Amherst NY" 9/1/2025
[7] Amherst Residents Look For Help In Soil Report On Sinking Homes, The Buffalo News, February 10, 2005

present at the hearing were at an age where they may soon find themselves having to rely on others for transportation. For many of them, their ability to drive will fade. Without LRT nearby they will not have access to paratransit. Some folks could become housebound and be socially isolated.

2.4 Operational Vibration

As with sound vibration, the DEIS offers effective remediation for operational vibration concerns. CRT is satisfied that operational vibration will not cause problems based on the NFTA planned mitigations.

2.5 Improving the image of Metro Rail

For years, Buffalo's LRRT has been derided as a train to nowhere. The NFTA is now working to change that by extending to Tonawanda, Amherst, UB, and into the DL&W terminal, adding new important destinations. Other extensions are needed and possible. The NFTA plans to study them following this first step, which builds a foundation for future extensions and leverages Buffalo's existing system.