



Buffalo, NY NFTA Metro Rail Extension Comments

Addendum

By Citizens for Regional Transit
5 February 2022

Citizens for Regional Transit (CRT) is a community-based transit advocacy nonprofit that has worked to promote better public transit in Buffalo-Niagara for over 50 years. We served on the NFTA-Metro advisory committee for this project throughout the alternatives analysis and preliminary environmental assessments and continue to serve on the NFTA-Metro Citizens Advisory Committee that provides inputs to NFTA-Metro projects and operational decisions. We submitted detailed comments on the NFTA-Metro DEIS on 21 March 2021, and follow-up comments on FTA-DEIS on 14 October 2021. Our comments were based on the understanding that Transit Oriented Development criteria would be foremost in FTA approval of Buffalo Metro Rail extension. This document focuses on the new Justice40 initiative and how implementing the Metro Rail Extension project could be the posterchild for a roll-out of the new FTA Justice40 initiative.

We implore the FTA to implement the extension of Buffalo's light rail rapid transit (LRRT) connecting the City of Buffalo with the University of Buffalo's (UB) North Campus and to drop plans to re-evaluate bus rapid transit (BRT). BRT lacks the capacity to serve the North Campus and more importantly, maintains the structural barrier between the City of Buffalo and the North Campus in Amherst, Buffalo's most populous suburb. We have spent the last 10 years studying the Amherst transit extension, evaluating a wide range of mode and alignment alternatives. LRRT along Niagara Falls Boulevard (NFB) was selected as the best solution and the community-preferred approach. It's time to move ahead without further delay.

Executive Summary

Buffalo, New York is a disadvantaged city having persistent poverty. Adjacent suburban Amherst, New York is home to the University at Buffalo's (UB) North Campus. UB's North Campus was designed to include light rail to connect the campus with the city and UB's other campuses.

Connecting UB's North Campus with Metro Rail will provide access for city residents to one of the area's largest employers and New York State's largest academic campus which offers undergraduate, graduate, and post-graduate degrees. It offers tuition-free classes for senior citizens. Currently, Buffalo's Metro Rail system terminates at the city line, 4.6 miles from the North Campus.

For more than 40 years, the City of Buffalo has been underserved and adversely affected by the lack of transit access to the UB North Campus. Likewise, the UB students living on the North Campus have been denied direct access to the City of Buffalo.

CRT supports the LRRT option only. We ask the FTA to review the Amherst Light Rail Extension proposal considering Justice40 aspects as well as transit oriented development (TOD)



concerns. We think you will find Buffalo's LRRT extension the ideal project to move forward with to make Justice40 a reality and to demonstrate its benefits. Because the FTA is the lead agency, this project offers the opportunity to move forward with immediate implementation.

History

As was repeatedly pointed out at NFTA and FTA DEIS public scoping meetings, the primary reason for the extension of Buffalo's Metro Rail is the university. Buses cannot provide enough capacity. UB's North Campus complaints about inadequate bus service date back many years. From 1997: "Even with the extra buses they've added for the morning rush hours, people are still packed in like sardines."¹

Buffalo's metro rail opened November 1978.² By 1979 expectations were being set that the Amherst extension would be just around the corner. "Without a doubt, Amherst will figure in our plans. In our original study, it had the most volume and cost-effectiveness."³

The expectations were never met, leaving Buffalo's Metro Rail coming to a halt deep underground with a multi-story barrier to negotiate for those wishing to travel to or from UB's North Campus. Transit passengers are forced to change mode between subway and bus adding so much inconvenience to get to the North Campus the public correctly understands you need a car and can't take transit to get there.

Many were and still are convinced that the lack of funding was the result of racism or at least a desire to keep disadvantaged city residents out of more prosperous Amherst. "Amherst Supervisor Daniel J. Ward this week submitted a proposed local law that would wipe 'transit station' zoning off the books in the county's largest town."⁴ The Supervisor wanted to distance Amherst from the City of Buffalo. The proposal was not enacted.

In the early 2000's, The University at Buffalo embarked upon an expansion program to restructure and grow enrollment from about 20,000 students to 30,000. The plan, known as UB2020, was unveiled 19 November 2008. After conducting a great deal of research for UB2020, it was overwhelming that faculty, staff, and students wanted Metro Rail extended to the

¹ Page Miller, Transport Traumas, The Spectrum, Page 10, 10 September 1997.

<https://digital.lib.buffalo.edu/items/show/84852>

² Ex-Bufferalo Mayor Praises New LRRT, Page 13, The Spectrum, 8 November 1978.

<https://digital.lib.buffalo.edu/items/show/85201>

³ Possible Transit Line Extension; Planners Will Seek Federal Aid, Page 6, The Spectrum, 17 September 1979.

<https://digital.lib.buffalo.edu/items/show/85272>

⁴ Ward's Opposition to Rapid Transit Assailed Proposed Zoning Change Seen as Bid to Distance Amherst from City: North Edition, The Buffalo news, 1993-03-26, ISSN: 0745-2691



Amherst campus. Professor Robert Shibley⁵ is dean of UB's School of Architecture and is UB's chief campus architect. "We are supportive of high-quality, high-capacity transit service to UB's North Campus," Shibley said. "Our preference is to achieve a one-seat ride from downtown Buffalo to Amherst."⁶ Shibley recognized the only possible way to accommodate a one-seat ride is to extend Metro Rail. The university has continued to support Metro Rail extension.

Then, compared with now

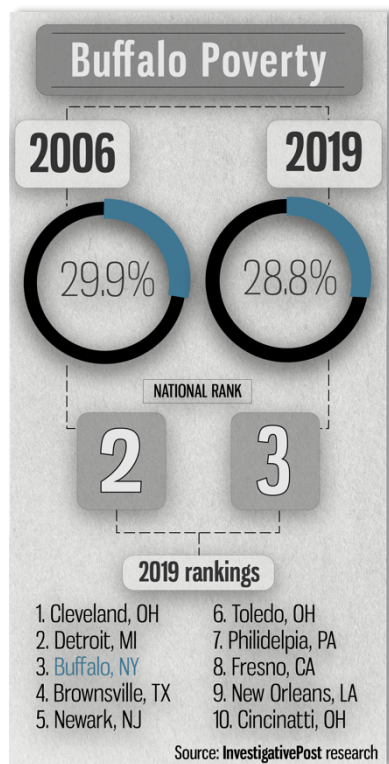
In September 2021, U.B. Center for Urban Studies School of Architecture and Planning & U.B. Community Health Equity Institute released a definitive study titled, "The Harder We Run." CRT recommends everyone involved with Justice40 read this document. From the executive summary conclusion, "**Thirty-one years later, the portrait of Black Buffalo remains unchanged.** The unemployment rate remains in the double digits (11%), and the average household income is \$42,000 in constant dollars. Approximately 35% of Blacks have incomes below the poverty line and 32% own their homes. There are still more Blacks without a high school diploma than with a college degree, albeit the ratio is tightening. Most Blacks live on Buffalo's East Side and conditions are getting worse in many of those neighborhoods. The fate of Black Buffalo remains tied to East Side development. The changes in their lives over the past thirty-one years have been modest. During this period, an entire generation saw little if any improvements in their lives."⁷

⁵ School of Architecture and Planning, People.
<http://archplan.buffalo.edu/People/faculty.host.html/content/shared/ap/students-faculty-alumni/faculty/Shibley.detail.html>

⁶ Professor Dr. Robert Shibley, News and Events, UB Unveils Draft of Plan to Redesign and Reconfigure its Campuses, 19 November 2008. <https://arts-sciences.buffalo.edu/biological-sciences/news-events.host.html/content/shared/university/news/news-center-releases/2008/11/9793.detail.html>



The City of Buffalo is a Disadvantaged Community



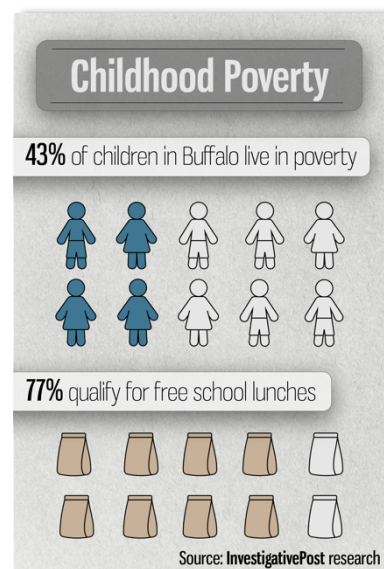
CRT finds it heart-wrenching to report these findings to the FTA. Buffalo is a beautiful city filled with wonderful people.

The charts on this page are from The Investigative Post's article, *Buffalo Remains an Impoverished City*.⁸

It shouldn't be this way. Structural racism in our LRRT configuration contributes to the problem by denying access.

CRT is an affiliate of the Partnership for the Public Good (PPG). Here is a quotation from the Investigative Post article citing PPG's Executive Director, Andrea O Suilleabhain:⁹

Research done by PPG shows one-third of jobs in the Buffalo region pay less than \$26,000 per year, and more than half of Buffalo residents struggle to pay the rent. Add in childcare and transportation costs and Súilleabháin said it's hard for the typical low-income family in Buffalo to keep pace.



Access Denied

The UB South Campus Metro Rail station stands as a monument to denial of access. To get to UB's largest campus where most UB jobs are and where the undergraduate school is housed, transit users must climb several stories from the subway platform, cross three roads while going up an incline to reach the UB BRT station. The denial is both physical and psychological. It is a major problem for people with disabilities. FTA could put an end to this formidable obstacle by approving LRRT Metro Rail extension for the Amherst Campus. More than 28% of Buffalo households do not have access to cars.¹⁰ The South Campus blockade works in two directions. Connecting the City of Buffalo and the UB Amherst Campus with LRRT will not only provide

⁸ Buffalo remains an impoverished city, Mark Scheer, Investigative Post, 12 October 2021.
<https://www.investigativepost.org/2021/10/12/buffalos-persistent-poverty/>

⁹ Poverty in Buffalo: Causes, Impacts, Solutions. A Report for the Truth Commission on Poverty in Western New York, April 2018.

¹⁰ Vehicle Ownership in U.S. Cities Data and Map. <https://www.governing.com/archive/car-ownership-numbers-of-vehicles-by-city-map.html>



access to jobs and education for city residents, but it will also eradicate a symbol of suppression. It will end isolation for the thousands of students who live on or near the UB Amherst Campus who do not have cars or have direct access to city amenities and institutions in the City of Buffalo. The University at Buffalo is a public university. Many students are poor. UB should be accessible by Metro Rail.

“As of fall 2015, only 98 of 2,513 (4%) faculty were black. Of these, only 41 were tenure track ... in a 38 percent black city.”¹¹

Enrollment by Race & Ethnicity

MOST COMMON RACE OR ETHNICITY

1. White
15,086
2. Asian
4,188
3. Black or African American
2,338

UB enrollment numbers are equally revealing. DataUSA¹² enrollment figures are shown in the graphic to the left. Blacks represent a small portion of UB's students.

To illustrate the value and importance of having a UB degree DataUSA explains, “The highest paying jobs for people who hold a degree in one of the 5 most specialized majors at University at Buffalo are Surgeons, Securities, commodities, & financial services sales agents, Physicians, Cardiovascular technologists

and technicians, and Diagnostic medical sonographers.” In 2019, surgeons who are UB alumni lead the way earning \$350,000 annually.

UB is one of the region's largest employers. Faculty, staff, research, adjunct, food service, custodial, and skilled labor careers are offered. There are hundreds of part-time and temporary positions, as well. On 5 February 2022, UB had 330 mostly union job postings on their web site.¹³

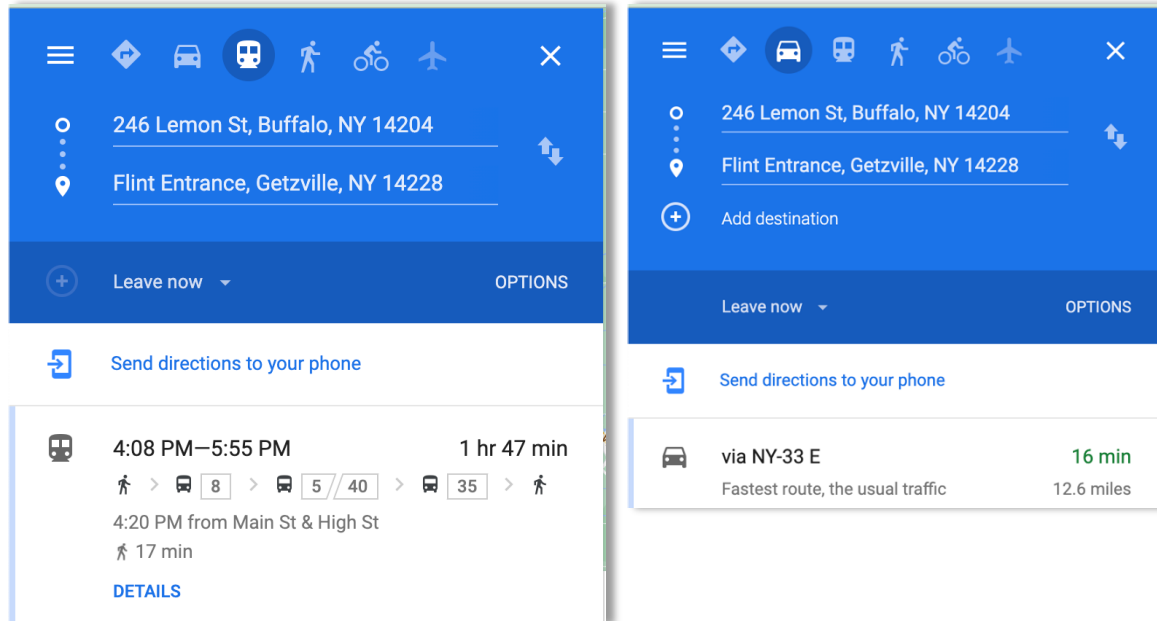
¹¹ Letter: UB Gaslights Its Part-Time Workers, by The Public Staff / Aug. 30, 2017.
<http://www.dailypublic.com/articles/08302017/letter-ub-gaslights-its-part-time-workers>

¹² University at Buffalo, DataUSA, 28 November 2021. <https://datausa.io/profile/university/university-at-buffalo/>

¹³ Employment Opportunities. <https://www.ubjobs.buffalo.edu/postings/search>



If the LRRT option is supported by the FTA, residents of the City of Buffalo will have access to these jobs without having to spend more than an hour on transit for a trip that takes 16 minutes by automobile.¹⁴ (Flint Entrance is the main UB North Campus bus/drop-off loop).



Conclusion

Justice40 factors weigh heavily in favor of LRRT over any bus option because extending the existing subway eliminates denial of access. Transfer between subway mode and bus is a burden that blocks disadvantaged transit riders from University at Buffalo jobs, education, entertainment, arts, and sports. The Buffalo Metro Rail extension offers the FTA a project that is ready to move forward expeditiously. Because the alignment does not require any right-of-way acquisition, costs and time to acquire is zero.

¹⁴ Google Maps: Directions, 28 November 2021. <https://www.google.com/maps/>



Up to 14 buses per full 4-car train

Three steps required with BRT: exit train, go to surface level, wait for bus and board.

Selecting the BRT option will require three steps to transition from the train to the bus: exit the train, take the escalator to the upper level, wait for the bus and get on. This will add significant time to the trip as summarized on the table below. The bottom line is that those who can afford cars will drive as they do today. The disadvantaged will take the time hit and use the bus, or not make the trip at all and miss the opportunities UB offers. This is denial of access and works exactly against the goals of Justice40.

The table below shows the amount of time penalty incurred across the 3 options the FTA has identified: (0) do nothing and continue with the UB BRT Stampede and NFTA buses; (1) do BRT on Niagara Falls Boulevard; and (2) do LRRT on Niagara Falls Boulevard. You can see that considering the total travel time including the mode shift, only the light rail (1-seat ride) solution provides fast service.

We therefore ask that the FTA abandon the idea of BRT. It won't provide the needed capacity and will continue to disadvantage the disadvantaged.



	Alternative	Travel Time	Mode Shift Time (UB riders)	Mode Shift Time (public)	Total Time	Capacity
0	Do Nothing (Stampede Millersport)	17 minutes	5 to 10 minutes		Up to 27 minutes	50 / bus
0	Do Nothing (NFTA bus #44)	14 minutes		5 to 40 minutes	Up to 54 minutes	50 / bus
1	BRT - NFB	22 minutes	5 to 10 minutes	5 to 10 minutes	Up to 32 minutes	50 / bus
2	LRRT - NFB	19 minutes	0 minutes	0 minutes	19 minutes	700 / 4-car train

CRT continues to enthusiastically support LRRT over DO NOTHING and BRT options. We strenuously oppose enhanced bus and BRT options and call on the FTA to move quickly to implement the Light rail extension using the NFTA determined Locally Preferred Alternative. Time spent studying BRT is more time denying Buffalo residents access to the job and educational opportunities available on the Amherst Campus.

We look forward to meeting with the FTA to discuss these issues in more detail.