Citizens for Regional Transit (CRT) hereby addresses the scope of issues in the Amherst metro rail expansion project Draft Environmental Impact Statement (DEIS). CRT is vitally interested in how the design of transportation infrastructure impacts the economy and environment and health of our communities. We see that this project proposes changes that are immensely beneficial and important to our region.

CRT offers its strongest support for completion of the proposed light rail extension project.

CRT endorses the following contents of the Draft Environmental Impact Statement as is:

- Chapter 1 – Project description
- Chapter 5 – Community facilities and utilities
- Chapter 8 – Historic and cultural resources
- Chapter 18 – Hazardous and contaminated materials
- All appendices

Below, CRT offers comments organized by DEIS chapter. We think addressing the following topics will result in an even stronger case in support of the project.

Chapter 2 – Land use, zoning and community character
This chapter does a good job except for its description of and plans for the Muir Woods portion of the study area. The project will require a significant intrusion into the woods. The study should explain how the woods are currently used and describe anticipated environmental impacts.

Chapter 3 – Socioeconomic conditions
This chapter makes a very strong argument in favor of the project. The project will be most attractive to and serve 15 to 19 and 20 to 24-year-old age groups. These two groups constitute the largest groups in the study area. Figure 3.2 is especially informative. The study area median income is below the Erie County average.

Chapter 4 – Potential property acquisitions and displacements.
The DEIS should mention that NFTA is in conversation with the new owners of the Boulevard Mall site and hopes they will want the LRRT to cut diagonally through the site. The developer is waiting to see where the project goes and seems willing to accommodate rail in their project and is holding off on development waiting to find out if we can secure the rail extension.

The DEIS does not address who owns Muir Woods nor how much property will need to be acquired for the proposed park-and-ride parking lot and for a secure train staging and washing facility. This topic should be addressed in the final report along with environmental impacts.

Chapter 6 – Environmental justice
This chapter could be improved by noting that the proposed extension will be atypical in that it will primarily serve public university students rather than commuters going to and from work. The expected ridership will be mostly low and no-income young people having diverse ethnic backgrounds. Quoting the UB Spectrum newspaper of 3/2/2020, "Mike Montoro, a mathematics Ph.D. student and the UB Council's student representative, said, 'Many graduate students at UB can barely pay for food…'"

Chapter 7 – Visual resources
Figure 7-1 misleads in describing the area north of I-990 as "Suburban Office/Residential district." This area is a North American hardwood forest with water retention ponds for I-990 and Ellicott Creek flood prevention. There is no illustration of the area north of I-990. The DEIS should include pictures of the retention ponds and the forest.

Chapter 9 – Parkland and recreational resources
This chapter is missing mention of Muir Woods. The DEIS should address this topic.

Chapter 10 – Natural resources
This chapter is missing mention of Muir Woods. The DEIS should address this topic.

Chapter 11 – Water resources
Swimming in Ellicott Creek is simply out of the question. DEIS does not make mention of the persistent flooding issue at the intersection of Maple Road and Niagara Falls Boulevard. This flooding issue would have to be addressed in some manner, either by raising the track bed or correcting drainage. Removal of forest and future development in the area north of I-990 requires planning for additional water management. This should be mentioned in the DEIS and not left to the future developers. The Proposed Action will drive the nature of the development north of I-990. The light rail park-and-ride facilities are specific to the Proposed Action.

Chapter 12 – Geology, soils and farmlands
As is mentioned, clay soils range in depth from 1 to 70 feet. These soils expand and contract with moisture and temperature. Failures of home foundations dug into clay in the Audubon community have been attributed to pressure changes due to hydration, dehydration and resultant shrinkage of the clay. Inadequate design in the building of the foundations has forced some homeowners to replace their home foundations. This should be mentioned in the report along with a statement that the light rail will be engineered to work safely on clay soils.

Chapter 13 – Transportation
This chapter is an excellent discussion of transportation issues. It is noted that UB attempts to run Stampede buses "every 5 to 10 minutes." 5-minute headways on buses is an unattainable goal. Bunching is inevitable, and UB Stampede buses are no exception. Stampede buses do not meet their headway goals during peak periods. The DEIS should note BRT options were studied and rejected.

Chapter 14 – Noise
This topic has generated the most strident opposition to the extension project. Figure 14-4 shows several residential properties fall within the zone of Residential Adverse Impacts. All but one home on Partridge Run will be outside the zone of residential adverse impacts if the southbound lane of JJ Audubon Parkway was used for the rail extension instead of the northbound lane. A sound barrier could be used to mitigate noise for this one property.

Sound is generated from train motors. It is generated when the train stops or goes around bends.

Safety sounds are generated when the horn is used and when train doors open and close. Since all carriages will be replaced, it would be worthwhile to explore a technology solution to safety sounds. There still should be a massively loud horn that the operator can sound in case of dire need, such as a car attempting to cross the tracks by going around a crossing gate. However, other safety sound volumes could be regulated by sensors on the train that set volume according to the ambient volume. Safety noises don't have to be any louder than necessary. These safety sounds could be set to play only slightly louder than the current ambient noise level in real time wherever the train is at any given moment.

Chapter 15 – Vibration
As with noise, vibration impacts to residential neighborhoods due to operations can be mitigated considerably by using the southbound lane of JJ Audubon Parkway for light rail rather than the northbound lane.

Chapter 16 – Air quality
This chapter needs revision. Nowhere does the chapter mention that greenhouse gases are the largest single component to air pollution in the USA and that transportation is the largest contributor of that pollution. No mention is made about how much greenhouse gas emissions will be avoided by switching riders from fossil-fuel based modes of transport to locally produced (mostly hydro-produced) electric powered rail. The DEIS ought to mention the quantity of greenhouse gases that will be averted over the anticipated life of the system. The DEIS should provide the number of boardings experienced and estimate on how much greenhouse gas has already been averted over the 50 years of service of the current light rail system. The fossil-fuel reduction must be accounted for, but it isn't even mentioned.

Section 16.4.2 of the DEIS says that the Proposed Action will not reduce VMT and therefore MSAT (Mobile Source Air Toxins) will not be significantly less. We find that difficult to believe given that millions of trips will be converted from fossil-fueled vehicles to hydroelectric powered light rail. Induced demand should convert a significant number of motorists to light rail. An estimate of that induced demand should be provided in the DEIS. At a minimum the large number of UB stampede buses going between the campuses will be eliminated.

Chapter 17 – Energy
Figure 17-3 hits the nail on the head. Astonishingly, the DEIS makes no mention that the Proposed Action changes energy consumption from fossil-fuel based transportation to electric transportation. The change away from fossil-fuel to green hydro-electric energy is the most significant environmental aspect of the entire project! This should be the headline when it comes to any discussion of the transit extension project, yet it isn't even mentioned.

Figure 17-1 notes that transportation contributes 29% of US energy use. The DEIS should note that in Erie County transportation constitutes 40% of greenhouse gas pollution.

Chapter 19 – Construction effects
It's going to be dusty, noisy and dirty. We get it. The imposition won't last long. We hope the affected parties will understand that construction will be quick and that the long-term benefits will be worth it. The DEIS should emphasize these points.

Chapter 20 – Indirect and cumulative impacts
Section 20.4.1 Should be amended to say that the Proposed Action will significantly reduce traffic demand on the Millersport Highway/Grover Cleveland corridor due to two significant factors. UB Stampede buses will be eliminated and commuting demand between UB North Campus and South Campus in the Millersport Highway/Grover Cleveland corridor will be reduced due to the proposed extension. The Proposed Action will make it possible for the Town of Amherst to implement its proposal to give the Grover Cleveland/Millersport corridor a road diet and a complete street makeover. This corridor is designated New York State Bike Route 517. The Proposed Action will allow the Town of Amherst and New York DOT to address the extremely dangerous situation regarding route NY 517. Air quality and noise improvements are anticipated which are expected to be welcomed by residents of this corridor.

CRT has other concerns regarding the DEIS.

1. **Deforestation of Muir Woods:** The DEIS does not illustrate planned mixed-use development north of I-990. Neither does it show the park-and-ride facility, nor how much land will be needed for track and the rail service facility. No mention is made of the effects of deforestation that appears to be likely should transit oriented development occur between I-990 and North French Road. These issues need to be addressed in the DEIS.
2. **Severe Safety hazard at the Ellicott Complex Station:** See Chapter 1, Figure 1-22 on page 1-28. The station is illustrated in the DEIS as situated on what until recently was the northbound lane of JJ Audubon Parkway. Situating the station south and east of the southbound lane forces pedestrians to cross the busy intersection of JJ Audubon Parkway and the traffic circle. Artificially increasing pedestrian traffic at this location is completely unnecessary and dangerous. It inevitably will lead to accidents and traffic jams at peak periods. The recently removed lane should be reconstructed, but with one lane for through traffic and two lanes dedicated to UB circulating and NFTA buses allowing for passengers to safely get to the Ellicott Complex Station without having to cross the street. Because the Ellicott Complex tunnel is designed for clockwise circulation, the circulation bus ought to have passengers board and alight on the right-hand side. The loop will not work safely if the Ellicott Complex Station is on the southbound leg. Coupled with the realization that noise and vibration to adjacent residential neighborhoods can be significantly reduced by using the southbound lane of JJ Audubon Parkway for rail, there are compelling reasons to use the southbound lane instead of the northbound lane of JJ Audubon Parkway for the Ellicott Complex Station.
3. **Bicycles:** Although the DEIS mentions that the Proposed Action will provide bicycle and pedestrian access between the Ellicott Complex Station and I-990, no specific mention is made that this alignment connects UB's bike path system with the proposed Peanut Line rails to trails proposal. This potential connectivity will delight many bicyclists and deserves to be mentioned in the report.

4. **The Ellicott Complex Station and Lee Station are too close together:** We have no quibble with the Ellicott Complex Station location except that it's on the wrong side of the street. The proposed Lee Station is a mere 820 feet from the Ellicott Complex Station. This is much too close. The natural location for a station is between Lockwood Memorial Library and Clemens Hall. This location is 1,715 feet from the Ellicott Complex Station and only 400 feet from the DEIS proposed Flint Station, which eliminates the need for the Flint Station. We anticipate students will heavily use these two stations within the campus. Our proposed Lockwood/Clemens station location is already ADA compliant, having a covered walkway and elevator access on east and west sides of the station location. See figure 1. This location is closer to Alumni Area, football stadium, the new athletic complex, UB Center for the Arts, and Slee Hall, each of which are event destinations. The location is directly on the central spine of pedestrian traffic on the campus. Using this location makes the Flint station unnecessary. Some of the cost savings of elimination of Flint station could be used to make this station grade-level instead of raised platform and enclosing it for passenger comfort.
5. **Low demand accommodations.** The DEIS anticipates low ridership levels for the stretch between the Ellicott Complex Station and I-990. It is likely that this stretch may not ultimately receive the same service level as the rest of the line. Therefore, a crossover should be installed south of Ellicott Complex Station. Likewise, during summer and vacation periods, there will be no need for frequent service north of the Lockwood/Clemens (or Lee) Station. A crossover should be installed between this station and Sweet Home station.
6. **Design to accommodate high capacity when needed.** Carraige selection and platform design should be done to handle peak loads such as during Sabres games and Canalside events. For example, car selection should provide maximum flexibility for increasing capacity by allowing passage between cars. Longer 5-car platforms at new stations near park-and-rides and the DL&W station can implemented to support longer trains when needed. This will be especially important if the light rail is ever extended to serve the Bills Stadium.
7. **Multi-modal accommodations.** We are pleased that the extension provides multi-modal accommodations such as bike racks at stations (e.g., Sweethome) and bike lanes (e.g., Niagara Falls Boulevard). It should be a design goal to maximize multimodal accommodations throughout.

Figure 1

Best location for main UB North Campus station. Lockwood Memorial Library is on the left. Clemens Hall is on the right. There is a connecting walkway. This is on the path of the preferred local alternative. We are aware of elevation and utility concerns. We think rider comfort and accessibility concerns outweigh the extra engineering costs involved, particularly considering this plan requires one less station which should offset costs.