



Public Participation Plan





Greater Buffalo Niagara Regional Transportation Council

Resolution 2017-17

GBNRTC Public Participation Plan Approval

WHEREAS, the Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) is the designated Metropolitan Planning Organization (MPO) for the Erie and Niagara Counties; and

WHEREAS, the GBNRTC recognizes the need for effective public participation in development of plans and programs, and

WHEREAS, the GBNRTC maintains a Public Participation Plan indicating involvement techniques and process to effectively engage the public in the planning process, and

WHEREAS, the Fixing America's Surface Transportation Act (FAST ACT) explicitly adds public ports and certain private providers of transportation, including intercity bus operators and employer-based commuting programs to the list of interested parties that an MPO must provide with reasonable opportunity to comment on the transportation plan, and

WHEREAS, the Public Participation Plan has been amended to fully incorporate FAST ACT requirements, and

WHEREAS, all public notifications and outreach procedures related to updating the Public Participation Plan have been observed, and

WHEREAS, the GBNRTC supersedes the previous public participation plan adopted December 2011;

NOW, THEREFORE BE IT RESOLVED, that the Greater Buffalo Niagara Regional Transportation Council formally adopts the revised Public Participation Plan reflected in the attached for use in the metropolitan planning process.

BY: Rousey E. Kabi Date: 6/7/17
Chair, GBNRTC Planning and Coordinating Committee

BY: [Signature] Date: 6/12/17
Chair, GBNRTC Policy Committee



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Introduction

The Greater Buffalo Niagara Regional Transportation Council

The Greater Buffalo Niagara Regional Transportation Council (GBNRTC) is the designated Metropolitan Planning Organization (MPO) for Erie and Niagara Counties. By federal law, an MPO is designated by each state's governor for every urban area in the United States with at least 50,000 residents. MPOs devise solutions to regional transportation problems, which involves addressing land use, air quality, energy, economic development, and commerce.



GBNRTC is comprised of seven members representing the major political jurisdictions and transportation agencies in the region:

- City of Buffalo
- City of Niagara Falls
- County of Erie
- County of Niagara
- New York State Thruway Authority
- Niagara Frontier Transportation Authority
- NYS Department of Transportation



The Seneca Nation of Indians, the Logistics and Transportation Council of the Buffalo-Niagara Partnership, and the Empire State Development Corporation serve formally as Regional Strategic Stakeholders.

The Policy Committee is the decision making body of the GBNRTC and as such is responsible for approving resolutions regarding GBNRTC actions and provides final GBNRTC approval of plans, programs, and projects. The Policy Committee sets regional policies for transportation and associated development activities in the Buffalo Niagara region, while providing a pathway through external political and legislative systems.

The Planning and Coordinating Committee (PCC) is responsible for advising the Policy Committee on the approval of transportation plans, programs, and projects. Through its representatives and subcommittees, the PCC participates in the development of the GBNRTC certification documents (the Metropolitan Transportation Plan, the Unified Planning Work Program, the Transportation Improvement Program, and Air Quality Conformity



Determinations). The PCC has approval authority for minor amendments to the Transportation Improvement Program (TIP) as well as Unified Planning Work Program (UPWP) budget revisions, and also provides general oversight for GBNRTC staff and operations.

Regional strategic stakeholders review and provide comments and recommendations on such GBNRTC documents as the Metropolitan Transportation Plan and the Transportation Improvement Program. Stakeholders isolate and bring forward key issues requiring GBNRTC consideration as they relate to GBNRTC policy and the development of GBNRTC plans and projects.

GBNRTC supports a coordinated transportation planning process for Erie and Niagara Counties primarily through the following activities:

- **Metropolitan Transportation Plan (MTP):** Addresses at least a 20-year planning horizon, and includes both long-range and short-range strategies and actions that lead to the development of an integrated transportation system facilitating the efficient movement of people and goods. The MTP is updated every four years to reflect changing conditions and new planning policies and principles.
- **Transportation Improvement Program (TIP):** A regionally agreed upon list of priority projects, as required by federal law. The TIP is updated at least every two years, and lists all projects that intend to use federal funds, along with non-federally funded projects that are regionally significant.
- **Unified Planning Work Program (UPWP):** A one to two-year schedule of all urban transportation planning activities. The UPWP includes detailed descriptions of the transportation and air quality planning tasks, and a summary of the amount and source of state and federal funds to be used for planning activities.

As an MPO, GBNRTC is responsible for selecting projects to receive federal funding from the Federal Highway Administration and Federal Transit Administration. Public agencies, jurisdictions and tribes are eligible to apply for different types of funding. Projects selected to receive funds undergo a public comment and review period prior to GBNRTC Policy Committee approval as part of the TIP process.

The region's transportation projects are typically sponsored by government agencies, who design the projects and conduct appropriate public and stakeholder engagement. GBNRTC's committees review and approve projects to ensure federal and state regulations are met, as well as to see that individual projects align with regional transportation goals.

GBNRTC staff members develop short and long range transportation plans, and conduct research and provide data as requested by local municipalities on vehicle, pedestrian and bicycle traffic, air quality, and population trends. GBNRTC also has a number of interactive maps available on its website, including a bicycle routes map, vehicle and pedestrian traffic, and a roadway inventory. GBNRTC helped spearhead the [One Region Forward](#) planning effort for Buffalo Niagara, and continues to be closely involved in its implementation process.





GBNRTC and Public Participation

Participation from a range of stakeholders—including residents, businesses, community organizations, and local governments—in the transportation planning process is important because transportation is vital to our quality of life, and transportation projects can have significant effects on different groups of stakeholders. People rely on transportation infrastructure to get to and from work, school, recreation, and other services. The way we move around can create healthy lifestyles and community vibrancy, as well as support clean air and water. Our economic growth and regional competitiveness also rely on efficient and multiple forms of transportation.

GBNRTC is committed to transparency and to meaningfully engaging the region's residents throughout the transportation planning and program development process, and strives to provide clear and complete information in an appropriate and timely manner. Active participation by a range of stakeholders improves the understanding of different viewpoints, different needs and concerns, and helps to identify common goals.

Purpose of the Public Participation Plan

GBNRTC last updated its Public Participation Plan in 2011. Since that time the Buffalo Niagara region has experienced changes in its economy and population, and has made additional efforts at public involvement in community development and planning processes. For example, One Region Forward had an extensive and innovative stakeholder engagement process to identify a regional vision for sustainable growth and development in Erie and Niagara Counties. This Public Participation Plan builds off of that momentum. GBNRTC will be launching the 2050 Metropolitan Transportation Plan, which acts as a visionary plan for transportation in the region and requires a range of stakeholder input. There is also an increasing focus on environmental justice and equity in transportation planning. The updated Public Participation Plan is an opportunity to provide guidance to ensure that all residents benefit from transportation investments, especially those who have been traditionally underserved by the transportation system.



The purpose of GBNRTC's Public Participation Plan is multifold. The Plan provides a framework for GBNRTC staff and member agencies to guide participation processes in transportation planning projects and programs. The Plan identifies ways to continuously improve participation and engagement efforts to better involve a range of stakeholders—particularly residents who have been traditionally underserved and underrepresented, such as minority and low-income populations, and those with limited English proficiency—a growing part of the region's population who may not typically be brought into the planning process.



The Plan can help facilitate a culture of practices in which the public, transportation agencies, and other stakeholders actively and collaboratively address concerns. GBNRTC's Participation Plan also describes to the public and other stakeholders how to become involved in transportation planning decisions that affect them and their communities. The Plan specifies GBNRTC's goals for participation, and provides guidance to evaluate participation processes.

This Participation Plan also demonstrates GBNRTC's compliance with federal requirements for public participation. Overall, these requirements call for MPOs to establish early and continuous public involvement opportunities in a variety of formats to a full range of interested parties. The list below provides an overview of these laws and policies; a detailed description of each is available in Appendix A:

- American with Disabilities Act
- Environmental Resource Agency Consultation
- FAST (Fixing America's Surface Transportation) Act
- Federal Transit Administration Program-of-Projects Requirements and Section 5307 Grant Program
- National Environmental Plan Act
- Title VI/Environmental Justice

Public Participation Plan Development Process

This Public Participation Plan was developed in several stages. GBNRTC staff first conducted a review of best practices from jurisdictions in the US and Canada, with particular attention to innovative engagement methods, as well as ways to effectively engage minority, low-income and limited English proficiency residents.

GBNRTC then gathered input from stakeholders about barriers to participation, preferred methods of participation and engagement, and about the goals of participation. Stakeholders were chosen based on federal guidelines, along with other relevant groups; see Figure 2 for the full list of stakeholder categories. For the purposes of this Plan, "stakeholders" refers to the public (i.e., residents at large), organizations representing specific groups of people and interests, as well as government agencies and departments.

Figure 1: Stakeholder Categories

- Residents
- Affected public agencies (US and Canada, Erie and Niagara Counties)
- Representatives of public transportation employees
- Public ports
- Freight transporters
- Private transportation providers
- Representatives of public transportation users
- Representatives of pedestrians and cyclists
- Representatives of the disabled
- Senior citizens
- Limited English Proficiency residents
- Minority groups/people of color
- Organizations involved in other planning related activities:
 - New York State planned growth
 - Local planned growth
 - Local economic development
 - Environmental protection
 - Historic preservation
 - Airports
 - Human services
 - Land management
 - Indian tribal governments

Invitations were sent to 27 key stakeholders, and GBNRTC was able to conduct nine in-person or phone interviews with representatives of the following stakeholder groups:

- Residents
- Community organizations
- Human services organizations
- Transit providers
- Freight transporters
- Cyclists and pedestrians
- Mobility impaired

Other stakeholders were invited via email to participate in an online survey, which was also shared publicly via social media. 30 people completed at least part of the survey, and of those indicating their affiliation, the respondents represented residents, government agencies, and human service agencies. While the interviews and surveys are not intended to act as a representative sample of stakeholders, the results provide initial suggestions to be incorporated into public participation efforts going forward. Feedback from stakeholders reflects both their

experience and opinions about GBNRTC specifically, as well as the region's transportation planning more broadly.

Relevant GBNRTC staff also provided input about their current engagement and participation methods, and what they see as barriers and which methods are most effective.

The Plan underwent an informal internal review, followed by a formal comment period in which the public had 45 days to review and comment on the final draft plan. The results of this review period are included in Appendix B. The Plan was then given to GBNRTC's Policy Committee for final approval in May 2017. The Plan is a living document and will be evaluated and updated regularly (see Appendix C for an Evaluation Matrix).

Goals of Public Participation

Public Participation Spectrum

The purpose and goals of public participation and engagement vary depending on the decision-making context. The International Association for Public Participation (IAP2) describes a range of participation to help organizations identify stakeholders' roles in participation processes (Figure 3). This spectrum is increasingly being used by governments and other organizations across the world, and is a useful way to consider different goals of participation and engagement initiatives.

Table 1: IAP2 Public Participation Spectrum (from IAP2 website)

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
Public Participation Purpose	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.



Erie Basin Marina in the City of Buffalo

GBNRTC's Goals

GBNRTC's public and stakeholder participation and engagement processes aim to achieve several goals:

- Receive **early and active public input** on transportation planning activities and decisions, and provide **timely responses** if necessary.
- Ensure that the products of transportation planning **reflect the needs and concerns** of Erie and Niagara Counties' residents.
- Effectively involve a full range of stakeholders, including those who have been **traditionally underserved and underrepresented**, such as minority, low-income or mobility impaired populations, and residents with limited English proficiency.
- **Educate and inform** the community about transportation planning issues and processes, and provide **equal access** to these opportunities.

Stakeholders' responses in interviews and surveys align with many of these same goals. They feel that public participation and engagement should help **raise awareness** about upcoming projects, funding opportunities, and about available transportation services. Stakeholders also see public participation as a way to **maintain a dialogue** between residents and decision-makers, as well as to **provide feedback** about organizations' and people's priorities for transportation projects and services—particularly how transportation relates to employment, access to services, and a healthy environment.

GBNRTC's Ongoing Participation and Engagement Opportunities

GBNRTC currently employs a variety of participation and engagement methods in its primary responsibilities related to the Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP). The following methods mainly serve to provide information and receive feedback, which may be passed along to project sponsors when appropriate:

- **Regularly scheduled meetings:**
 - Policy Committee meetings are held at least twice a year, are open to the public and include an opportunity for public comment. Meetings may also include a public forum. Advance notice of meetings and agendas are distributed no later than 10 calendar days prior to the meeting to any interested members of the public and news media as requested. Meeting information including date, time, location and meeting minutes are posted on the GBNRTC website and social media, and sent to the email list.
 - Planning and Coordinating Committee meetings are regularly held on the first Wednesday of every month. An annual schedule is established at the first meeting of each year and is listed on the GBNRTC website. All regular meetings are open to the public and include time for public comment. Advance notice of meetings and agendas are distributed no later than 10 calendar days prior to the meeting to any interested members of the public and news media as requested. Meeting information including date, time, location and meeting minutes is posted on the GBNRTC website and social media, and sent to the email list.





GBNRTC Policy Committee Meetings are held at least twice a year

- **Social media:**
 - A variety of social media platforms (including [Facebook](#), [Twitter](#) and [Instagram](#)) are used to share information about meetings, transportation-related events and news items, and to respond to followers' questions and comments.
- **Website (www.gbnrtc.org):**
 - GBNRTC maintains a website which is updated frequently to keep the public informed. The site contains information on the agency's responsibilities, programs, publications, meetings and events; contact information; a search function; Title VI information, including complaint procedures; and a comment form so visitors may comment directly to GBNRTC on any subject.
- **Email list:**
 - This list is open for anyone to join and receive meeting information, TIP and MTP information, and information about opportunities for public comment and feedback
- **Metropolitan Transportation Plan development:**
 - The MTP leverages extensive public participation and engagement from One Region Forward to help identify its vision and goals. There is a dedicated MTP webpage. Stakeholder input and feedback opportunities exist throughout the MTP's development, including identifying performance measures and projects and programs, and providing input on equity and environmental justice analyses.
- **MTP and TIP amendments:**
 - Amendments are any major change to the MTP or TIP, including the addition or deletion of a project or a major



- change in project cost, project phase initiation dates, or a major change in design concept or design scope.
 - Amendments require Policy Committee approval and are subject to a public review and comment period of at least 20 calendar days. Informational notices using plain language are released via email and social media to inform the public of any proposed amendment. Efforts are made to contact relevant stakeholders located near proposed project locations.
 - Comments can be submitted via mail, email and as social media posts. All comments are recognized with a written response, and individually addressed by GBNRTC staff or project sponsors.
- **Speaking engagements:** GBNRTC staff regularly present at events hosted by educational institutions, community organizations, local municipalities, and government agencies and upon request.
 - **Outreach to low-income, mobility impaired and minority residents:** GBNRTC publishes notices in minority media outlets, and coordinates with human services and community organizations to conduct outreach.
 - **Limited English Proficiency residents:**
 - The GBNRTC web site can be viewed in multiple languages with a selection on the “Google Translate” button.
 - GBNRTC considers what level of translation or interpretation services are required, and can provide LEP individuals with language assistance through written language translations of key materials or interpretation if needed.



GBNRTC staff regularly present at events hosted by educational institutions, community organizations, local municipalities, and government agencies and upon request.





Stakeholder Feedback on Participation and Engagement Methods

Current Engagement with GBNRTC

In addition to the ongoing methods listed above, this updated Public Participation Plan aims to ensure that stakeholders' preferred methods of engagement are reflected. The survey results indicate that stakeholders are "somewhat satisfied" to "satisfied" with their level of engagement with GBNRTC—although this may indicate that they themselves are not very actively engaged.

Most survey respondents (over 50%) currently engage with GBNRTC via the email list, as well as through Facebook and by attending meetings. Staff members of stakeholder organizations indicated they sometimes directly contact GBNRTC staff when appropriate. Over half of the survey respondents prefer GBNRTC to communicate information to them via the email list, and some would like GBNRTC to also attend their own organization's meetings (where relevant).

Public Participation Framework

A framework to guide public participation can help address and integrate stakeholders' preferences, and develop effective engagement activities. This section first describes some considerations to make when designing these activities. It goes on to provide examples of successful and innovative public participation techniques.

Designing Public Participation and Engagement Activities

Based on Bryson et al (2013), the following set of questions act as design guidelines for public participation and engagement activities:

1. Is stakeholder participation required or needed here?
 - Why or why not?
 - How does the issue at hand benefit from participation?
2. What is the purpose of this participation activity?
 - What are the desired outcomes? (see the Public Participation Spectrum, Table 1)
3. Who needs to be involved and how?
 - Conduct a stakeholder analysis and/or assess the community where the project will be located.
 - Ensure an appropriate range of interests are engaged, including those who might normally not be at the table—go beyond the “usual suspects”.
 - Staff at the Chicago Metropolitan Agency for Planning and Chittenden County Regional Planning Commission use worksheets before beginning any public engagement in order to understand the target audience, community history, and identify relevant stakeholders.
 - Austin and Seattle have used opportunity mapping to display different aspects of opportunity, such as education, economic mobility, and housing on maps overlaid with demographics.
4. How will stakeholders’ input influence the project?
 - Identify how you will communicate this to participants.
5. How will you manage power dynamics?
 - Formal meetings may be dominated by only those comfortable with that format.
 - Consider using small groups or one-on-one conversations.
 - Don’t privilege expert knowledge over “local” knowledge; residents’ first-hand experience can help improve project design to better meet local needs.

Example Participation and Engagement Methods Across the Participation Spectrum

Table 2 contains a variety of methods at each level of participation based on input from GBNRTC’s stakeholders and review of best practices. These methods have demonstrated success elsewhere, and can augment existing activities. More detailed descriptions of some new and innovative methods (in italics) are included below the table. Together with the design guidelines above, GBNRTC staff and member agencies can select from an array of options to develop participation and engagement activities. Specific strategies and the extent of public participation will be customized for each individual plan or program.

Table 2: Example Participation and Engagement Methods

INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
<ul style="list-style-type: none"> • Fact sheet in plain language • Newsletter • Brochure • Technical report • Website (with translation available) • Social media • Online database • Interactive map • Press release (in community newspapers, radio) • Open house • Video • Public presentation, educational event (at community events, meetings) • Meeting livestreamed/ online • <i>Bus Stop Theatre</i> • <i>Mobile Transit Lab</i> 	<ul style="list-style-type: none"> • Public comment period (with online commenting) • Focus group • Survey • Interview • <i>Deliberative polling</i> • <i>Online feedback</i> • <i>Text messages</i> • <i>Street Team</i> • <i>Virtual public workshop</i> • <i>Meetings-in-a-box</i> • <i>Happy hour engagement</i> • <i>City Making Jeopardy</i> • <i>Community Think Tank</i> 	<ul style="list-style-type: none"> • Design charrette • Design studio • <i>21st Century Meeting</i> • <i>Walkshop</i> • <i>Conversation Cafe</i> 	<ul style="list-style-type: none"> • Citizen advisory group • <i>Neighborhood participation zones</i> • <i>Community Asset Mapping</i> 	<ul style="list-style-type: none"> • Referendum/ voting • <i>Citizen jury</i> • <i>Participatory budgeting</i>

- *Bus Stop Theatre*: Audience moves from scene to scene using public transportation, engaging with the environment, transit system, and community the subject matter is addressing (Minneapolis)
- *Mobile transit lab*: Transformed a bus into a mobile educational center and gathered input about transit needs; visited community events, schools, libraries and shopping malls (Tulsa, OK)
- *Deliberative Polling*: A random sample of residents are polled, and then some members are invited to discuss the issues; participants also engage in dialogue with experts and political leaders (various locations, including San Mateo County, CA)
- *Online feedback platforms* (e.g., coUrbanize, Metroquest, Open Town Hall, Placespeak): Comment on proposed plans, participate in surveys and polls, discussion forum with other residents (Austin, San Luis Obispo, Vancouver, Hampton, VA, Decatur, GA, and other locations)
- *Text message*: Input and feedback submitted via text (various locations, including One Region Forward)
- *Street Team*: Attends events to gather input through interactive activities (Boston)
- *Virtual public workshop*: An online town hall meeting (San Francisco)
- *Meetings-in-a-box*: Provide materials to community groups, businesses, and individuals to host their own meetings at their convenience (Austin)
- *Happy hour engagement*: Table tents and coasters in bars (residents write on coasters; text, tweet or email ideas); follow-up questions are sent each month (Minneapolis)
- *City Making Jeopardy*: Participants answer questions about planning issues (e.g., housing, transit); responses help identify people's priorities (Minneapolis)
- *Community Think Tank*: Comprised of people normally not usually invited to be part of an engagement process, such as a teenager or a person experiencing homelessness, who discuss community issues (Minneapolis)
- *21st Century Meeting*: Small discussion groups in-person and via web video
- *Conversation Cafes*: Hosted conversations held in a public setting for anyone to attend
- *Walkshop*: Community members and planners walk the neighborhood to better understand assets and needs (various, including Village of Williamsville)
- *Neighborhood participation zones*: Split neighborhood into "participation zones" and each area has a zone captain and assistants, all provided with stipends; they distribute newsletters and posters, and recruit residents for visioning workshops (Niagara Falls, NY)
- *Community Asset Mapping*: Interactive creation of a map of the community's resources to help identify key assets and opportunities to improve them (Vancouver)
- *Citizen jury*: A selection from a random sample of city residents who meet regularly to provide advice on a project (Hamilton, Ontario LRT project)
- *Participatory Budgeting*: Residents directly decide how to spend part of a public budget by developing project or program ideas and voting on them (various locations, including Buffalo)



Techniques for Involving Low-income and Minority Communities

GBNRTC's Equity Statement and Title VI Plan describes strategies to integrate the needs and concerns of low-income and minority communities into planning efforts, including creating demographic profile maps of low-income and minority populations for the GBNRTC planning area. These maps help in understanding which communities are prone to environmental justice concerns and assists in targeting public outreach efforts to these groups.

Based on stakeholder input and a review of best practices, the following represent some additional ways to better engage low-income and minority communities:

- Engage with residents at locations in the community (at farmer's markets, festivals, churches, health centers, etc.)
- Conduct personal interviews and focus groups
- Use visual materials, including maps and graphics to illustrate data, trends, impacts, options, etc.
- Work with community-based organizations and institutions to conduct outreach and organize activities

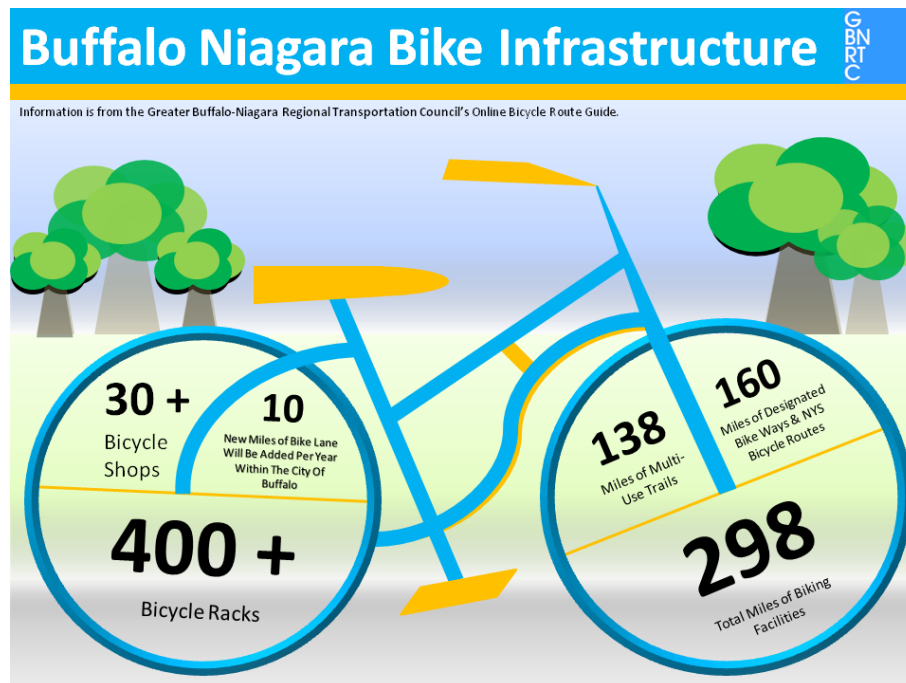


South Grand Island Bridge in Tonawanda, NY

Techniques for Involving Residents with Limited English Language Proficiency

GBNRTC's Equity Statement and Title VI Plan also provides guidance on how to engage residents with limited English language proficiency, including the following activities:

- Continue to make Google translate available on the GBNRTC web site.
- Provide Spanish language outreach materials from other organizations including federal, state and local transportation agencies when possible.
- Identify employees who fluently speak and/or write a language other than English. Detail which of these employees are also able to act as interpreters.
- Create a list of outside sources, including the cost of such services that can provide oral translation services.
- Develop a list of paid and unpaid translation services.
- Make efforts to partner with state and local agencies to provide language translation and interpretation services within the scope of the funding available.
- Include a statement on public meeting notices for significant updates to MPO products to encourage people to contact GBNRTC prior to meetings, and GBNRTC will make every reasonable effort to accommodate particular needs.



GBNRTC often uses infographics and videos in its communication as a visualization technique to help people understand the value of regional planning.

Appendix A: Requirements for GBNRTC's Public Participation Processes

American with Disabilities Act

The ADA requires that all federally funded activities be nondiscriminatory on the basis of physical or mental disabilities. Auxiliary aids and services when necessary to ensure effective communication, unless an undue burden or fundamental alteration would result, must be furnished to allow a person with a disability to participate. "Auxiliary aids" include such services or devices as qualified interpreters, assistive listening headsets, television captioning and decoders, telecommunication devices for deaf persons (TDDs), videotext displays, audiotaped text, Braille materials, and larger print materials. In accordance with ADA guidelines, all meetings conducted by GBNRTC take place in locations that are accessible to persons with mobility limitations. GBNRTC public meeting notices specify that special accommodations will be provided upon request.

Environmental Resource Agency Consultation

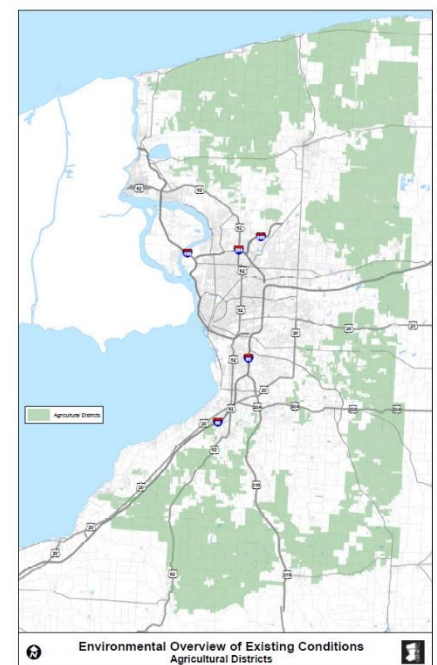
The Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) includes several provisions intended to enhance the consideration of environmental issues and impacts within the transportation planning process and encourage the use of the products from planning into the National Environmental Policy Act (NEPA) process. Environmental considerations in planning require certain elements and activities to be included in the development of metropolitan transportation plans, including:

- Consultations with resource agencies, such as those responsible for land-use management, natural resources, environmental protection, conservation and historic preservation; which shall involve, as appropriate, comparisons of resource maps and inventories
- Discussion of potential environmental mitigation activities
- Participation plans that identify a process for stakeholder involvement
- Visualization of proposed transportation strategies where practicable

This approach to transportation decision-making considers environmental, community, and economic goals early in the planning stage, and carries them through project development, design, and construction. This can lead to a more effective decision-making process that minimizes duplication of effort, promotes environmental stewardship, and reduces delays in project implementation. To address this new requirement, GBNRTC developed an agency consultation process that included the following steps:

Step One: Develop Partnerships

GBNRTC contacted Federal, State, Local, and Tribal agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation to provide them with information regarding GBNRTC and its activities and request their participation in the agency consultation process.



Agricultural Districts Map



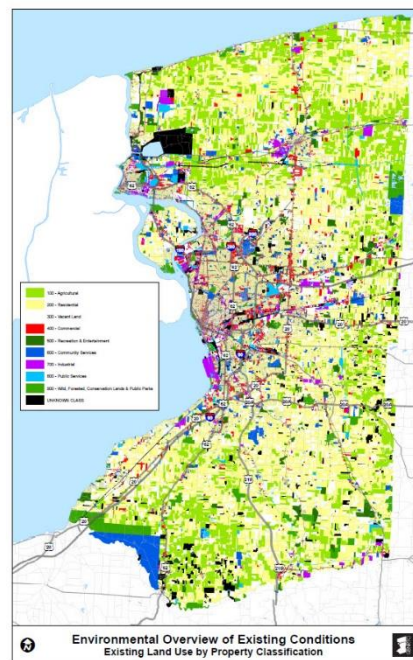
Step Two: Identify and Integrate Plans

Consulting agencies provided GBNRTC with available data, maps, and plans as related to cultural, natural, and historic resources in the region. GBNRTC incorporated this data and produced a number of maps included in the Plan that identified ecologically significant areas including wetlands, agricultural lands, Wildlife Management Areas (WMA), and parks, as well as areas of historic and cultural importance. The materials gathered through this process were documented by GBNRTC and reviewed by consulting agencies.

Step Three: Mitigation Activities Discussions

GBNRTC initiated discussions with consulting agencies regarding possible mitigation activities identified in the *Framework for Regional Growth in Erie and Niagara Counties*. Consulting agencies were asked to review materials and provide feedback to GBNRTC. Agencies identified for the initial agency consultation include:

- NYS Office of Parks, Recreation, and Historic Preservation
- NYS Department of Environmental Conservation (DEC)
- NYS Department of Agriculture and Markets
- NYS Historic Preservation Office (NYSHPO)
- Department of State - Division of Coastal Resources
- U.S. Fish and Wildlife Service
- U.S. Army Corps of Engineers
- Niagara County Soil & Water Conservation District (SWCD)
- Erie County Soil & Water Conservation District (SWCD)
- Erie County Environmental Management Council
- Niagara County Environmental Management Council
- Seneca Nation of Indians



Land Use (Parcel) Map

FAST (Fixing America's Surface Transportation) Act

The FAST Act requires that MPOs “shall develop and use a documented participation plan that defines a process for providing individuals, affected public agencies, representatives of public transportation employees, public ports, freight shippers, providers of freight transportation services, private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cash-out program, shuttle program, or telework program), representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process (81 FR 93473, 2016).

Table 3 outlines FAST Act requirements for MPO public participation processes, and describes the actions taken by GBNRTC to meet these federal requirements.

Table 3: FAST Act Public Involvement Requirements

FAST Act Requirement	GBNRTC Action
Require adequate public notice of public participation activities and time for public review and comment on the proposed MTP and TIP	Email list, social media and media coverage are some of the channels GBNRTC uses to promote MTP and TIP development activities. Notices are published at least 10 calendar days prior to a scheduled public participation activity, and include meeting information such as date, time, location, and description of the activity. Meeting information is also posted on the GBNRTC website.
Provide timely notice and reasonable access to information about transportation issues and processes	GBNRTC utilizes a variety of public participation techniques to provide interested individuals, groups, and organizations with timely information about transportation issues and processes. GBNRTC maintains a contact list including but not limited to government agencies and organizations, local elected officials, neighborhood groups, special interest groups, block clubs, private transportation providers and community service groups. GBNRTC publishes a quarterly blog to provide interested individuals and others with information on its activities. GBNRTC also sponsors and participates in community workshops, community forums, conferences and other events to keep the public informed and involved in various transportation projects and plans, and to elicit feedback from the public and regional partners.
Employ visualization techniques to describe metropolitan transportation plans and TIPs	GBNRTC employs a variety of visualization techniques such as videos, PowerPoint presentations, GIS overlays and maps, photo simulations, infographics and traffic simulation models to draw attention and make material more understandable to a wider audience.
Make public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web	GBNRTC publishes draft MTPs and TIPs on the GBNRTC website; meeting information including date, time, location and meeting minutes are posted on the GBNRTC website.

FAST Act Requirement	GBNRTC Action
Hold any public meetings at convenient and accessible locations and times	GBNRTC makes every effort to hold public meetings in locations that are ADA compliant and located on transit routes. Public meetings are held at various times during the day and early evening.
Demonstrate explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP	All public comments, both written and verbal, received during a public review and comment period are addressed and included in the final MTP or TIP. Written comments are responded to in writing with copies forwarded to members of the Planning and Coordinating Committee (PCC). Technical clarifications and other minor questions are answered by GBNRTC staff or project sponsors. Significant comments are considered before any recommended action. The PCC is given a summary and/or presentation by GBNRTC staff of the public comments received prior to making an action recommendation to the Policy Committee.
Seek out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services	GBNRTC maintains and updates a demographic profile of the metropolitan planning area that includes identification of the locations of socio-economic groups, including low-income and minority populations. As appropriate, GBNRTC will place announcements in media outlets serving minority communities to ensure there is notification of upcoming outreach activities to these communities.
Provide an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts.	GBNRTC will initiate an additional 20 day public comment (30 days for FTA projects) and review period. Notice will be posted on GBNRTC social media, website and sent to the email list and media outlets to inform the public of the review and comment period and a formal public meeting will be held on the revised Metropolitan Transportation Plan or TIP.

FAST Act Requirement	GBNRTC Action
Coordinate with the statewide transportation planning public involvement and consultation processes	As appropriate, GBNRTC coordinates public participation activities on specific plans, programs, and projects with the NYS Department of Transportation and the NYS Thruway Authority.
Periodically review the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.	GBNRTC's Public Participation Plan will be reviewed periodically to determine its effectiveness in achieving its goals.
When significant written and oral comments are received on the draft metropolitan transportation plan and TIP (including the financial plans) as a result of the participation process in this section or the interagency consultation process required under the EPA transportation conformity regulations (40 CFR part 93, subpart A), a summary, analysis, and report on the disposition of comments shall be made as part of the final metropolitan transportation plan and TIP.	All public comments both written and verbal, received during a public review and comment period are addressed and included in the final MTP and TIP document.
A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO. Copies of the approved participation plan shall be posted on the World Wide Web, to the maximum extent practicable.	Updates to the GBNRTC Public Participation Plan initiates a public notification and a 45 day public review and comment period before it is adopted. Copies of the document are made available on the GBNRTC website, in the GBNRTC office and by request.

FAST Act Requirement	GBNRTC Action
<p>In developing metropolitan transportation plans and TIPs, the MPO should consult with agencies and officials responsible for other planning activities within the MPO that are affected by transportation (including State and local planned growth, economic development, tourism, natural disaster risk reduction, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities.</p>	<p>GBNRTC consults with federal, state and tribal agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation in developing transportation plans. Consultation activities involve, as appropriate, comparisons of resource maps and inventories and discussions on potential environmental mitigation activities.</p>
<p>Develop the metropolitan transportation plans and TIPs with due consideration of other related planning activities within the metropolitan area, and the process shall provide for the design and delivery of transportation services within the area that are provided by:</p> <p>(1) Recipients of assistance under title 49 U.S.C. Chapter 53;</p> <p>(2) Governmental agencies and non-profit organizations (including representatives of the agencies and organizations) that receive Federal assistance from a source other than the U.S. Department of Transportation to provide non-emergency transportation services; and</p> <p>(3) Recipients of assistance under 23 U.S.C. 201-204.</p>	<p>The Public Participation Plan describes measures to consider other related planning activities and delivery of transportation services provided by these stakeholder categories.</p>

FAST Act Requirement	GBNRTC Action
<p>When the MPA includes Indian Tribal lands, the MPO(s) shall appropriately involve the Indian Tribal government(s) in the development of the metropolitan transportation plan and the TIP.</p>	<p>The Seneca Nation of Indians has committed to a stakeholder role in the MPO. As such, the Seneca Nation attends and participates in GBNRTC-PCC meetings and offers recommendations and positions on transportation plans, projects, and processes. Outreach is also made to other tribal governments in the planning area.</p>
<p>When the MPA includes Federal public lands, the MPO(s) shall appropriately involve the Federal land management agencies in the development of the metropolitan transportation plan and the TIP.</p>	<p>GBNRTC consults with Federal land management agencies, including the Army Corp. of Engineers, agencies in the development of the metropolitan transportation plan and the TIP.</p>
<p>MPOs shall, to the extent practicable, develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies, as defined in paragraphs (b), (c), and (d) of this section, which may be included in the agreement(s) developed under §450.314.</p>	<p>GBNRTC's Public Participation Plan describes decision points in which other governments and agencies are consulted.</p>



The Clarence Pathways and the Akron-Newstead Bike Path combine to make a scenic bike/pedestrian trail of ~17 miles.

Federal Transit Administration Program-of-Projects Requirements and Section 5307 Grant Program

While a Federal Transit Administration grant applicant may choose to maintain a separate approach for complying with the public participation requirements of 49 U.S.C. Section 5307(c)(1) through (c)(7) concerning the applicant's proposed Section 5307 grant program, the grant applicant is encouraged to integrate compliance with these requirements with the locally adopted public involvement process associated with the TIP.

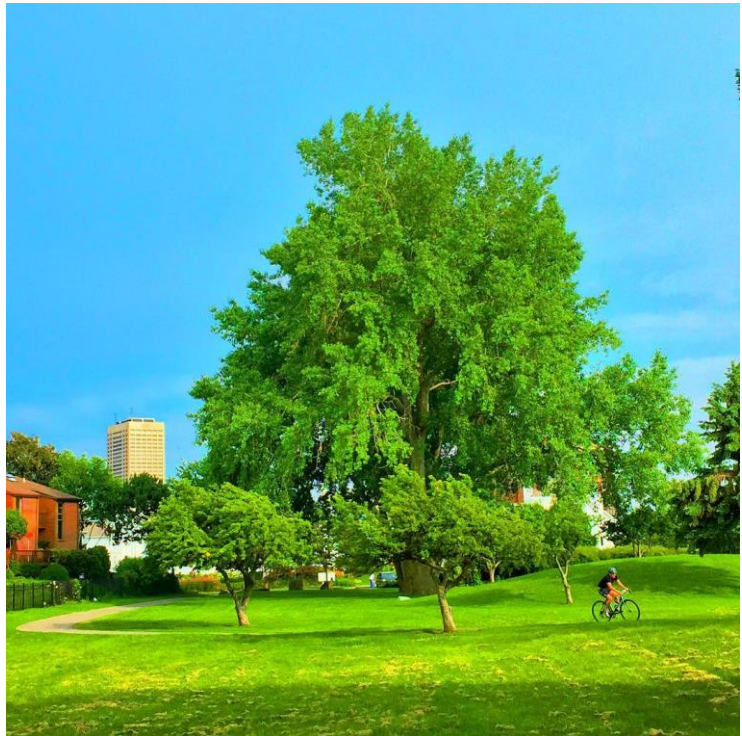
Grantees that choose to integrate the two should coordinate with the MPO and ensure that the public is aware that the TIP development process is being used to satisfy the public hearing requirements of Section 5307(c). The grant applicant must explicitly state that public notice of public involvement activities and time established for public review and comment on the TIP will satisfy the program-of-projects requirements of the Urbanized Area Formula Program. A project that requires an environmental assessment or an environmental impact statement will involve additional public involvement, as presented in joint FHWA/FTA environmental regulations, "Environmental Impact and Related Procedures," 23 C.F.R. Part 771.

Title VI/Environmental Justice

The 1994 Environmental Justice Executive Order 12898 supplements the existing requirements of Title VI of the Civil Rights Act. Title VI states that each Federal agency is required to ensure that no person on grounds of race, color, or national origin is excluded from participation in, denied the benefits of, or in any other way subjected to discrimination under any program or activity receiving Federal assistance. Supplemental legislation provides these same protections from discrimination based on sex, age, disability or religion.

The concept of environmental justice is intended to ensure that procedures are in place to further protect groups that have been traditionally underserved. The fundamental principles of environmental justice are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.



LaSalle Park in the City of Buffalo

GBNRTC engages with a range of stakeholder to ensure full and fair participation by all potentially affected communities. This updated Public Participation Plan includes new strategies to improve outreach efforts to a broad range of communities.

GBNRTC uses GIS and other tools and data sources to aid in determining the needs of traditionally underserved communities and to assess how regional transportation programs and plans impact different population groups in the region. One technique used to minimize the potential adverse effects on affected populations is to identify and then create demographic profile maps of low-income and minority populations for the GBNRTC planning area. These maps help in understanding which communities are prone to environmental justice concerns and assists in targeting public outreach efforts to these groups.

The methodology for identifying communities of potential EJ concern involves a the following three-step process: (1) determining the regional percentages of low-income and minority populations (2) using the regional percentages as thresholds for determining whether or not a particular Census tract is considered to be predominantly low-income or minority (3) mapping these thresholds (individually and together) to provide a visual representation of the spatial distribution of low-income and minority populations in the region.



Niagara Falls State Park, USA



Niagara Falls Amtrak Station

Appendix B: Social Media Policy for Community Engagement & Regional Transportation Planning

As more and more people obtain and share information online, social media is quickly becoming an important communication tool and an integral part of the GBNRTC's public involvement strategy. Social media channels allow the GBNRTC to reach a broader audience and provide a forum for people to share and discuss relevant and timely information on transportation planning issues.

Guidelines

GBNRTC operates and maintains its social media sites as a way to provide information about GBNRTC programs, projects, issues, events and activities. It is used to supplement traditional communication methods and increase meaningful interaction with stakeholders. Social media sites that may be used are (but not limited to): Facebook, Twitter, YouTube, LinkedIn, and blogs.

Information received by social media users in the form of comments, @replies, or direct messages or any other method allowed by third-party social media sites will be treated as feedback and discussion and do not constitute official public comment to the GBNRTC. Whenever possible, links will be provided to users to submit official comment. Information received may be summarized and shared with GBNRTC's Policy Board, Planning Committee or technical committees as appropriate. The use of social media will follow all federal, state, and GBNRTC related laws and/or policies regarding the sharing of information, collection of data, and archiving.

Content

GBNRTC may share articles, websites, or online information produced by outside sources as appropriate. Information may include newspaper articles, municipal websites, other transportation and/or planning agencies or other informational content. GBNRTC may share these items as "information only" and does not endorse, support or have responsibility for the accuracy for these items.

GBNRTC does not allow explicit or profane language or content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation, nor is sexual content or links to sexual content allowed.

GBNRTC does not allow solicitations or advertisements. This includes promotion or endorsement of any financial, commercial or non-governmental agency. Similarly, we do not allow attempts to defame or defraud any financial, commercial or non-governmental agency.

GBNRTC does not allow comments that suggest or encourage illegal activity.

GBNRTC social media channels are not open to comments promoting or opposing any person campaigning for election to a political office or promoting or opposing any ballot proposition

GBNRTC does not allow information that may tend to compromise the safety or security of GBNRTC, the public or public systems.



GBNRTC reserves the right to remove any material on their social media sites which violates this policy. If available, GBNRTC may also use a social media's 'blocking' feature for repeat offenders of the content guidelines.

GBNRTC posts to social media sites will be the responsibility of the staff person(s) assigned by the Executive Director. The Executive Director will make a final determination on any item that may be questionable as related to this policy.

Public comments on GBNRTC-generated content should be limited to comments related to the posted topic. GBNRTC social media channels are not the proper place to express opinions or beliefs not directly related subjects or areas in which the GBNRTC conducts its business (ex. transportation policies and programs).

User's Privacy

GBNRTC does not collect or store the personal information of social media users except when required by law. Social media sites such as Facebook or Twitter may have their own privacy policies that may differ from GBNRTC's.

This policy statement is subject to amendment or modification at any time to ensure its continued use is consistent with its intended purpose. Questions or concerns regarding GBNRTC presence on various social media channels should be directed to GBNRTC at staff@gbnrtc.org



Appendix C: Public Participation Evaluation Matrix

GBNRTC's Public Participation Plan is a living document that represents an evolving framework to guide—and improve upon—participation and engagement activities. Regular monitoring and evaluation can help assess how well GBNRTC is meeting its goals related to public participation and engagement.

Goal	What is measured
Receive early and active public input on transportation planning activities and decisions, and provide timely responses if necessary.	<ul style="list-style-type: none"> • Number of comments received during review periods for MTP and TIPs • Number of days to respond to comments • Public/stakeholder satisfaction with ability to have input into transportation planning activities and decisions (via survey)
Ensure that the products of transportation planning reflect the needs and concerns of Erie and Niagara Counties' residents.	<ul style="list-style-type: none"> • Public/stakeholder satisfaction with the decisions on TIPs and MTP (survey)
Effectively involve a full range of stakeholders, including those who have been traditionally underserved and underrepresented , such as minority and low-income populations, and residents with limited English proficiency.	<ul style="list-style-type: none"> • Public/stakeholder satisfaction with participation and engagement process (survey) • Public/stakeholder satisfaction with the decisions on TIPs and MTP (survey) • Number of organizations representing minority, low-income, mobility impaired and LEP populations participating in engagement activities

Educate and inform the community about transportation planning issues and processes, and provide **equal access** to these opportunities.

- Number of participants reporting they learned something or changed what they thought after engagement activity (survey)
- Public/stakeholder satisfaction with accessibility of engagement activities (survey)
- Number of people opening the newsletter
- Number of email list subscribers
- Number of Facebook page and posts likes
- Number of Twitter followers, and post likes and re-tweets
- Number of Instagram followers and posts likes
- Number of website visits (monthly)
- Website search terms
- Number of document and data downloads from website
- Number of members of the public and other stakeholder groups attending events and meetings
- Number of members of the public and other stakeholder groups making comments at meetings

Appendix D: Public Comments and Responses

Public Participation Plan Review Period

April 5, 2017

GBNRTC has prepared for public review a draft of its updated Public Participation Plan. This draft Plan describes GBNRTC's procedures to actively involve the public and other stakeholders in its transportation planning. The Public Participation Plan was last updated in 2011, and this new plan incorporates current practices and federal requirements. The Plan was developed by reviewing best practices, as well as by integrating stakeholder feedback gathered via interviews and an online survey.

We welcome your comments, as well as any clarifying questions you may have. These can be submitted via email at feedback@gbnrtc.org, or via social media on Facebook and twitter.

In order to receive full consideration, comments on this Plan should be submitted by May 19, 2017.

The Public Participation Plan can be downloaded at <http://www.gbnrtc.org/getinvolved/>

Hard copies of the Plan are also available Monday-Friday, 9am-5pm at 438 Main St, Suite #503, Buffalo, New York 14202

Summary of Comments Received

4/10/17

To: GBNRTC Executive Director, 438 Main Street, Suite 503, Buffalo, NY

14202 <feedback@gbnrtc.org>

From: Citizens for Regional Transit (CRT), 617 Main St., Suite #201, Buffalo, NY 14203
<crtc@citizenstransit.org>

Comments on Draft Public Participation Plan

The plan is well-designed and impressively thorough in its consideration of multiple avenues of communication to/from multiple interest groups.

Especially notable in this plan is the attention to environmental quality.

The emphasis on access by all concerned entities, including private citizens, with added attention to particular citizen groups (low-income, mobility impaired, minority, and those with limited English proficiency) is also commendable.

CRT has a history of long and active involvement with the GBNRTC. Whenever possible, representatives of CRT attend meetings of the Policy Committee and the Planning and



Coordinating Committee. A statement from CRT is made at many of the PCC meetings during the public participation portion.

Public planning sessions are also a high priority for CRT, with at least one Board member usually attending and offering comments when appropriate.

We appreciate these opportunities. We also appreciate the timely email and Facebook postings announcing these meetings and events.

A few improvements can be made in the section on outreach for regularly scheduled meetings (page 8). The notices on social media, in email, and to the press do not always adequately capture the issues in everyday language. For those outside the transportation planning profession, the issues to be covered within the discussion topics are not always easy to discern, for example if esoteric transportation terms are used. There is little incentive to attend a meeting when exactly what will be discussed is unclear. Also, when topics of special interest to certain localities will be discussed, the residents and organizations located near those places should be notified in such a way that they understand the importance of their participation in particular issues to be discussed.

The news media similarly do not seem to be attending or reporting much on GBNRTC planning meetings. This may be due, in part, to the sometimes-esoteric language of the announcements. On page 10, the statement “where the project will be located” should apply not only to the location of the event or meeting, but also to the location of the projects to be discussed, as appropriate. This would allow advance notices that can be targeted to those near the location of the project(s) that will be discussed.

On page 10, the item about how stakeholders’ input will be used is very important. If participants are skeptical about whether their suggestions will be heard and acted upon, they will tend to participate less enthusiastically and/or less often. This aspect of the process is also highlighted on page 16 in the FAST Act Requirements, mandating written responses to members of the public who have submitted their remarks and consideration of “significant” comments “before any recommended action.”

In light of these requirements, the plan should include a process whereby any written public input will receive a written response from GBNRTC. At a minimum, this should include a letter or email thanking the person or organization for their inputs with a statement that the comments are being considered along with the other public comments. When appropriate, more specific feedback can be included. This can include a description of follow-up action planned and the anticipated timeline. Such response details can be done via a link to the GBNRTC webpage where the project details are enumerated or included in the written feedback.

On page 11-12, Table 2, some very innovative ideas are presented. These are based on best practices in other places and should be adopted here when appropriate. Some that caught our eye as being very promising are: fact sheet in plain language, Bus Stop Theatre, Mobile Transit Lab, Community Think Tank, and Conversation Café.

Overall, the GBNRTC public participation process has worked well in the past for CRT. This new plan has the potential to improve and expand the process to new groups and individuals in



the Buffalo-Niagara region who have not had a voice in transportation planning.

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Citizens for Regional Transit seeks to educate the public, public officials, their authorities and agencies in the Buffalo-Niagara region about the benefits of a comprehensive transportation system including an expanded Metro Rail.

www.citizenstransit.org

Facebook: Citizens for Regional Transit

Twitter: @WNYTransit

617 Main St., Suite #201, Buffalo, NY 14203

Response to Comments Received

From: Lisa Kenney [mailto:lkenney@gbnrtc.org]
Sent: Tuesday, May 30, 2017 2:52 PM
To: 'Citizens Regional Transit Corporation'
Subject: RE: comments on public participation plan

Good afternoon,

Thank you again for your comments. We have addressed these in the updated Public Participation Plan. Specifically, we have included provisions that project notices will use plain language, that efforts are made to contact relevant stakeholders located near proposed project locations, and that comments are recognized with a written response of their receipt.

We appreciate your feedback!

Best,

Lisa

Lisa Kenney, PhD

Planning Advisor

Greater Buffalo Niagara Regional Transportation Council

438 Main St, Suite #503

Buffalo, New York 14202

(716) 856-2026 ext 315



References

Bryson, J. M., Quick, K. S., Slotterback, C. S., & Crosby, B. C. (2013). Designing public participation processes. *Public Administration Review*, 73(1), 23-34.

FAST Act, 23 CFR 450.316 (2016). http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.1.5.11&idno=23#se23.1.450_1210

International Association for Public Participation. "IAP2's Spectrum of Public Participation." http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/Foundations_Course/IAP2_P2_Spectrum.pdf



DRAFT 2050 METROPOLITAN TRANSPORTATION PLAN UPDATE
Public Review and Comment Period
April 5, 2023 to May 4, 2023

NOTICE OF PUBLIC MEETINGS

The Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) is holding two public meetings to encourage the community to review and comment on the Draft 2050 Metropolitan Transportation Plan Update. The Plan is an update to Moving Forward 2050, the region's metropolitan transportation plan and contains an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system in the Erie and Niagara County region through the year 2050. The following public meetings have been scheduled to present and discuss the draft plan. A presentation will be made followed by a question and answer period. Special accommodations will be provided upon request.

Tuesday, April 25, 2023 – Hybrid
Join us in-person in the Sunburst Room
438 Main Street, Buffalo, NY 14202 (Accessible entrance located at 15 Court St)
Join us virtually on Facebook: <http://facebook.com/GBNRTC>
10:30am-noon

Tuesday, April 25, 2023 – Virtual Only
Join us virtually on Facebook: <http://facebook.com/GBNRTC>
5:30pm-7pm

The public review and comment period is from **April 5, 2023 to May 4, 2023**. An electronic version of the draft plan is available at <https://www.gbnrtc.org/draft-movingforward2050update>. Paper copies are available at GBNRTC's office: 438 Main St. #503, Buffalo, NY 14202. Please send comments via email to staff@gbnrtc.org by Thursday, May 4, 2023.

For more information email staff@gbnrtc.org or call (716) 856-2026 ext. 310.

The Greater Buffalo-Niagara Regional Transportation Council assures that no person shall on the grounds of race, color, sex, age, disability or national origin, as provided by Title VI of the United States Civil Rights Act of 1964 and subsequent legislation, regulations, statutes and orders, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any MPO program or activity.

Moving Forward 2050 Update Public Comments
April 25, 2023 (In person & Virtual) Public Meeting @10:30am

Bridge Ranch asked if there will be enough time to review the public comments received prior to the PCC/Policy members voting to approve the draft Plan.

- GBNRTC response: Members will be provided a summary of all the public comments received prior to adoption of the Plan.

Thomas Frank asked if NITTEC is still part of the planning process.

- GBNRTC response: Yes, NITTEC continues to be a partner of the GBNRTC. GBNRTC is responsible for planning and NITTEC performs the day to day operations.

Thomas Frank said that multimodal options especially around schools should be promoted. He mentioned traffic congestion along Main Street in the Village of Williamsville.

- GBNRTC response: Agreed. Promoting a multimodal network is a primary focus of the Plan.

Jeff Amplement asked what inflation rate was used to develop the updated project costs.

- GBNRTC response: For purposes of developing the 2023 MTP's Project Listing, construction cost inflation was quantified using USDOT's National Highway Construction Cost Index (NCCHI). For projects which were carried through from the year-2018 project listing and for which no updated cost estimate was available from the sponsoring agency a 42% uplift was applied to the year 2018 cost estimates and 2.5% annual cost inflation was carried forward in out-years.

Bridge Ranch asked why the Plan shows a slight increase in VMT since the previous Plan.

- GBNRTC response: VMT has rebounded since the Covid-19 pandemic but we are currently seeing a phenomenon of peak spreading. The traditional peak hours we experienced pre-pandemic are now spread out during the mid-day.

Bridge Ranch asked specifically about page 95 of the draft Plan and the VMT model outputs.

- GBNRTC response: These are model outputs on page 95 and not all projects can currently be modeled with the regional traffic model. The outputs do not account for *all* proposed projects (for example cycle tracks) that could impact VMT in the region.

Moving Forward 2050 Update Public Comments
April 25, 2023 Virtual Public Meeting @5:30pm

No comments received.

Social Media/Online Outreach

Comments received via Facebook

Thomas DeSantis: I would like to encourage all to participate in this public hearing.

Thomas DeSantis: I would also like to say that I think the time allotted for the public to know about and to actually engage in or comment on this plan update is very short. I can only hope that GBNRTC doesn't repeat this style of public engagement in future.

- GBNRTC responded via direct email advising on the public outreach requirements in the Public Participation Plan.

Comment received via Online Comments Card

Andrew Wierzbieniec: I'm excited by the proposed projects, as a resident of Snyder/Amherst area I'd like to see some real effort going towards bike infrastructure and pedestrian safety programs. Main Street (route 5) is far too wide and set to too high a speed - it needs a road diet from 290 to Bailey. There are no connections to bike lanes/routes in the area allowing for commuting/travel from Snyder. I'd love to see some connectivity to the proposed park on Sheridan and North Forest, as well as enhanced pedestrian/bike routes to Williamsville over the 290. Thank you!

- GBNRTC responded via email thanking Mr. Wierzbieniec for the comment and advising that it would be included in the formal summary of public comment.

LISC WNY Virtual Meeting in response to housing coordination outreach

May 2, 2023

Attendees:

Tyra Johnson Hux, LISC

Brittany Perez, LISC

Kelly Dixon, GBNRTC

Amy Weymouth, GBNRTC

- Data sharing and consistency of data collection and digitization of information for housing assessments is needed at the regional level.
- Strategies should be identified for displacement of residents when making infrastructure investments in communities.
- Anti-displacement strategies should be tracked to determine effectiveness.
- Housing types need to match with the needs of residents it is serving. For example, New American families often have large extended families so affordable, multi-family homes with at least 3 or 4 bedrooms are often needed and rare in the current market.
- There is a need for a clear process to better engage residents, community organizations and small businesses in the project development process in terms of how a project gets initiated and approved from start to finish. Unfolding the process and increased transparency is needed for the purpose of accountability.
- The meeting concluded noting that a summary would be provided in the public comment record and the GBNRTC and LISC would continue to coordinate on their respective efforts

Citizens for Regional Transit submitted a letter (Attachment A) on May 4, 2023 via email

GBNRTC responded via email:

Thank you for your comments. GBNRTC agrees that mentioning the transportation goals in the NYS Climate Leadership and Community Protection Act (CLCPA) Scoping Plan and the Erie County Climate Action Plan (ECCAP) will improve the document and that will be added. It's important to note that the goals were adopted by the NYS Climate Action Plan Council in December 2022 and there is much work to be done for transportation agencies to fully understand the implementation strategy but the goals are an important framework for New York State and can be used to shape the MPO's strategy. This discussion will also include additional details on how public transit can be used to achieve the Moving Forward 2050 Goals.

The comments regarding specificity on regional rail projects are agreeable as well and GBNRTC will add projects Erie and Niagara County projects from the NYS Rail EIS that was released in February 2023 to the Illustrative project list.

There are a number of additional recommendations for clarification that GBNRTC staff will further discuss with CRT and make updates to the final document as appropriate before it is published.

We wish to express our gratitude to the Citizens for Regional Transit (CRT) for their review and comment of this document and their continued partnership with GBNRTC.

Alexnader Ivanoff submitted the following comment on May 4, 2023

Name: Alexander Ivanoff

Email: aivanoff@growtrains.org

Comments: Good evening GBNRTC staff,

I have read through the 2050 MTP Update and have some compliments and concerns:

First, I want to say how refreshing it is to see a positive amount of social justice initiatives in the Update, but want to see that translated into policy, including increased emphasis on NFTA and other transit operators in Western NY. This is especially important when factoring in the impact of the horrific shooting last May at the Tops in East Buffalo on Jefferson Ave. The MTP Update must take disadvantaged communities into full consideration, and improved bus and rail transit through Western NY is critical to that.

I wholeheartedly endorse the proposals made by the Citizens for Regional Transit (CRT) in planning a full-scale build-out of Metro Rail. This could be done for about the same price, if not less, than the Phase II of the Second Avenue Subway in New York City. Not only would a full build-out have a positive impact on the region's carbon footprint but would also future-proof the region in the event that population increases are more profound in the event that the region becomes home to large numbers of climate refugees. An extension of Metro Rail to BNIA via the Walden Galleria and Central Terminal, which is to be undergoing redevelopment. Two of those locations are significant traffic generators and the third

(Central Terminal) has the potential to be a significant traffic generator. In addition, the extension of Metro Rail to Orchard Park and to the new Buffalo Bills stadium should be considered as part of a community benefit project.

On the bus side of NFTA, additional services and frequencies must be considered, especially to neighborhoods in East Buffalo that are transportation insecure (either without a vehicle or only one vehicle for multiple adults). Major bus routes should have headways between every 10-15 minutes during the day and every half hour on weekends. One of the issues with bus ridership in Western NY is the inadequate level of scheduled bus service. However, it is encouraging to see the talk of BRT on Bailey Avenue, and ideally such a service would use articulated buses and have full, dedicated bus lanes with traffic signal priority. In addition, the NFTA should consider cross-border bus service or partner with the Government of Ontario/Metrolinx to extend GO Transit's Lakeshore West service to Buffalo with NYSDOT providing a subsidy for such a service.

While maintaining a state of good repair of the region's highways is critical, there needs to be a de-emphasis on them, and where appropriate modifying the network to reconnect discontinued neighborhoods, like the proposal to make modifications to the Kensington Expressway (Route 33). Were it not for the region's job markets being spread out and not completely centered around Downtown Buffalo, the argument could be made for high occupancy vehicle (HOV) lanes along parts of the region's highway network.

All these are first steps in reducing the region's carbon footprint, providing for social and economic justice for the region's disadvantaged communities and for encouraging growth in Western NY. The region's basis transportation network is only a base that should be built upon.

If anyone on staff at the GBNRTC has any questions I can be reached via email at aivanoff@growtrains.org or by phone at 845-798-9662.

Thank you in advance.

Alexander Ivanoff

GBNRTC responded via email:

Thank you for your comments on the draft 2050 Metropolitan Transportation Plan update. Your comments will be shared with our members prior to adoption of the Plan and documented. Again, thank you for your participation in the planning process.



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May 4, 2023

Public Comments

GBNRTC

438 Main St., Suite 503

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Re: Comments on 2023 Draft Metropolitan Transportation Plan Update

To whom it may concern:

Citizens for Regional Transit (CRT) appreciates this opportunity to comment on the 2023 Draft Metropolitan Transportation Plan Update (DRAFT MTP).

We would like to commend GBNRTC staff on its section expanding recognition for Tribal Nations and Culture and that it appears upfront in the document as it rightly should. CRT is appreciative for this opportunity to comment on the DRAFT MTP.

CRT believes the DRAFT MTP can be improved upon. The DRAFT MTP should:

- Specifically mention the NYS Climate Leadership and Community Protection Act (CLCPA) Scoping Plan and the Erie County Climate Action Plan (ECCAP) goals and requirements
- Describe how public transit and especially Light Rail Rapid Transit (LRRT) can be used to achieve pollution goals and Moving Forward 2050 plan goals
- Describe the significance of regional rail connections

CRT must therefore express some concern.

The DRAFT MTP offers a noticeably lesser vision for the region in 2050 than its 2018 predecessor. This Update does not adequately address the real obstacles to successful plan implementation, nor does it present a convincing commitment to deploy innovative strategies by all the regional agencies to moving the region forward. Strategies that could go a long way to ensure achieving the region's 2050 vision are lacking; strategies that might just deliver real change in our transportation system's outcomes. Instead, it somehow seems to project a satisfaction with enhancing the results of our old ways of planning transportation improvements.

While the DRAFT MTP shows us that progress is being made on several fronts, the improvements are only being made incrementally. The result is an update to the plan



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that is disappointingly less than its predecessor. The 2018 predecessor made clear that it was “...more than just a plan...” That it was “...about more than just transportation, that it (was) a regional vision for Buffalo Niagara, (and) a better way for us to be Moving Forward to 2050.” The current version does not highlight these very important aspirational elements.

In 2018, Moving Forward 2050: A Regional Transportation Plan for Buffalo Niagara was about big ideas with big aspirational goals, but most importantly, it was a call for “big moves” and for working specifically to achieve them. The DRAFT MTP does not mention the notion of a big move... of any kind. Instead, there is the addition and seeming reliance on, “federally important areas of emphasis.” This, it seems to us, is a good thing and it is well explained in the document. However, these types of metrics under-value the more community-based goals and objectives that would seem to be what will be required to make new big moves that are needed to move forward.

Also, as CRT said in our 2018 comments, the DRAFT MTP should explicitly recognize the importance of reducing carbon emissions, congestion, and parking woes and again by acknowledging the need to decrease our collective dependency on automobiles and offering alternative ways to driving less and less —especially within the region.

The DRAFT MTP should be highlighting specific transit priorities and enumerating ways to achieve those goals, particularly considering the latest environmental and economic justice priorities (e.g., CLCPA, Justice40 Initiative, ECCAP).

The DRAFT MTP places too much reliance on converting the fleet to electric vehicles (EV). “...Emissions of climate-changing greenhouse gases from the transportation system are expected to decline from 2020 to 2050 by about 70% mainly due to increasing use of electric vehicles.” (Page 95). Table 6.1 shows an anticipated *increase* in VMT, which moves the region in the wrong direction. Reducing VMT is recommended by the CLCPA Scoping Plan and the ECCAP. The ECCAP calls for road diets and extending LRRT as ways of reducing VMT. The CLCPA Scoping Plan specifically calls for “doubling transit service” to reduce VMT.

The DRAFT MTP agrees with census data showing 80% of the US population lives in urban areas. Transportation planning should stop being designed for cars instead of for people. The Environmental Defense Fund states getting people to switch to public transportation is “...among the fastest routes to reducing air pollution. But to take advantage of this low-hanging fruit, countries and cities need to increase funding and



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investments." (Environmental Defense Fund Solutions, Spring 2023 Vol. 54 No.2 Page 12). The CLCPA requires investments be made to benefit historically disadvantaged communities, which is mentioned in The DRAFT MTP, as well.

The DRAFT MTP discusses the major Buffalo Metro Rail LRRT Amherst extension, which is CRT's top priority, and we are very pleased about this. The update also describes the smaller DL&W extension now in process, which is good. Other extensions reflecting the many NFTA studies over the years (referenced below) as well as the prior 2018 DRAFT MTP plan should be presented as goals in the 2050 update. The Bills Stadium Community Benefit Agreement notes the potential for a rail connection to the stadium.

Table 5.3 of the DRAFT MTP omits "High Quality Public Transportation to Buffalo Niagara International Airport" to Cheektowaga as shown in the 2018 version. CRT recommends that study of the East Buffalo/airport corridor be restored to the draft.

The 2023 DRAFT MTP plan does not specifically mention the NYS CLCPA Scoping Plan calling for "doubling transit service" and its goals to reduce VMT. CRT suggests the 2050 plan should have a section on the CLCPA Law and Scoping Plan, and how the new 2050 plan will meet CLCPA requirements.

Table 6.1 of the DRAFT MTP plan anticipates an increase in the use of public transit by 15% due to the LRRT Amherst Extension. CRT agrees with this conclusion and is highly supportive. Because 6 miles of LRRT now carries 18% of NFTA Transit ridership compared to over 1,000 miles of bus service, CRT agrees that doubling the miles of LRRT will have the anticipated effect. This argues for including LRRT East Buffalo/airport and southtowns extensions as alternatives to having to have a car.

CRT believes the way to reduce VMT and increase transit ridership is to extend LRRT instead of rebuilding the [freeways without a future](#). (See References)

CRT notes that according to the One Region Forward report, 82% of commutes in Buffalo Niagara are single occupancy vehicles. The DRAFT MTP plan uses a figure of 44%, which CRT believes is unreasonably low. A CRT analysis was made using the One Region Forward's 82% figure and the bus and rail capacities given in the NFTA Service Design Guidelines & Delivery Standards, 2021 Revision. CRT calculates that a 4-car Buffalo LRRT Metro train can conservatively remove over 500 cars from traffic every 10 minutes; a 38-seat bus can conservatively remove over 40 cars. If the



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GBNRTC is serious about reducing VMT as stated in the CLCPA Scoping Plan and the ECCAP, the necessity of using public transit is obvious.



Figure 1. A full NFTA bus can remove over 40 cars
(all the cars with red triangles in this picture)



Figure 2. A full 4-car Buffalo Metro train can remove over 500 cars every 10 minutes!



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The 2018 MTP also promised to alter our region's historic trajectory of misplaced priorities. Unfortunately, there is evidence those old ways of planning and their associated trends continue. For example, there is:

- Insufficient investment in our existing neighborhoods as we continue to sprawl outward;
- Pursuit of projects that maintain our region's overly automobile-centric status quo, which consumes more energy, degrades our urban environments, and diminishes our collective livability, and;
- A dearth of projects that would expand our region's modal choices and their accessibility, such as Light-Rail extensions and Intercity-Rail, which expands our connectivity while also consuming less energy, improving urban environments, and enhancing economic performance.

Buffalo Niagara desperately needs to invest more in expanding modal choices.

In this regard, we object to only two, relatively vague, intercity rail improvement projects being mentioned and listed in the draft's 'Table 5.5.' Not only are these two projects overly vague, but the DRAFT MTP does not include the currently existing passenger rail projects in the region. The NF Amtrak Maintenance Facility Project; the Niagara Falls, Canadian Border Services Agency (CBSA) Preclearance at the Amtrak Niagara Falls Station, and the Empire Corridor's Niagara Branch Improvements. All of these should be considered short-term actionable projects within the Buffalo Niagara Region and should have been mentioned somewhere in the document. These are known projects which should not solely rely on our partners to be advanced to design and construction.

The 2050 plan's "*Technology*" section is vague and only mentions optimizing traffic lights. This is too car focused. The focus should be away from cars and towards integrated mobility. Also, the CLCPA Scoping Plan (as does the Federal Justice40 plan) requires that investments serve disinvested communities. Artificial intelligence-controlled traffic lights will do little for the 30% of Buffalo households that do not own cars unless the traffic control system is set up to detect and prioritize bus, rail, bike and pedestrian traffic. Investments in transit helps disinvested communities the most. CRT is pleased to see the ITS4US project described.

CRT joins the NYS Climate Action Council in calling on GBNRTC to include public transit and regional rail investments as central components for meeting the CLCPA law CO2 reduction goals.



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In closing and despite our general concerns, we want to express our gratitude and thank the GBNRTC for taking leadership in developing this important document and providing the opportunity for public input.

CRT looks forward to additional opportunities to review and comment on the plan as it evolves and its resulting projects as those emerge.

We are also including an “Appendix A” (to these comments) that provides more detailed comments on a section-by-section basis reflecting the general comments noted above.

References:

A Transit Development Program for the Niagara Frontier Region developed under the Niagara Frontier Mass Transit Study. Federal Project No. NY-T9-4. NY State Project No. 5820. November 1971.

Transit Development Program for the Niagara Frontier Region.... 2001

Erie County Transit Service Restructuring and Fare Study - Strategic Assessment. August 2010.

Environmental Defense Fund Solutions, Spring 2023 Vol. 54 No.2

https://www.fightglobalwarming.com/sites/default/files/documents/SOLUTIONS%20Spring%202023_FINAL-web.pdf

New York State Climate Action Council Scoping Plan.

<https://climate.ny.gov/resources/scoping-plan/>

Federal Justice40 plan <https://www.epa.gov/environmentaljustice/justice40-epa>

Freeways without a future

<https://www.cnu.org/highways-boulevards/freeways-without-futures/2021>



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Appendix A

Draft 2050 MTP: Section-by-section comments

The following are more detailed comments by CRT for individual sections of the Draft 2050 MTP / DRAFT MTP: A Regional Transportation Plan for Buffalo Niagara.

Executive Summary

The Executive Summary has no consideration of transit or LRRT. The *“Reconsidering Transportation Infrastructure”* section only talks about cars and highways. This should be changed.

There should also be a section on the CLCPA Law and Scoping Plan, and how the new 2050 MTP will meet the NYS CLCP law requirements.

The *“Technology”* section is vague and only mentions optimizing traffic lights. This is too car focused. The focus should be away from cars and towards integrated mobility. Also, the CLCPA Scoping Plan (as does the Federal Justice40 plan) requires that investments serve disinvested communities. Coordinated traffic lights does nothing for Buffalo’s 30% that do not own cars. Investments in transit helps disinvested communities the most.

The *“Sustainability”* section notes GBNRTC’s emissions modelling capability. This capability is focused on emissions from cars. There needs to be a focus on getting people out of cars and switching to electric for cars and (more importantly) transit. This section should also say how we are going to install charging stations, upgrade our electrical grid, and provide incentives for moving to transit.

The Process

The chart on Page 9 highlights GBNRTC as the State’s local agency for implementing the State’s programs. There needs to be more focus on the latest NYS priorities from the CLCPA / Scoping Plan.

Chapter 1

On Page 17 the plan cites the Bipartisan Infrastructure Law (BIL) as a game changer because budgets for transportation will increase. This section should also note the CLCPA, the NYS environmental law that calls for extreme reductions in greenhouse gases (GHG) and significant changes to the transportation sector. For example, transition to electric vehicles and “doubling transit services”. This law promises to find new sources of revenue (e.g., carbon tax) to be applied to meeting the CLCPA



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requirements. Our 2050 MTP needs to be ready. Reference to the CLCPA and Scoping Plan should be added to this section.

Page 20 notes Executive Order (EI) 14008, “Justice40 Initiative”, and the justice goals of transportation planning it calls for. *Here, here!* We agree and are pleased to see its inclusion here. We believe this EO calls for more emphasis on public transit investments and less on electric vehicle infrastructure, although both are important. We also agree with the disadvantaged community definition on Page 21. We also applaud inclusion of complete streets on Page 22.

Page 23 notes the importance to the US strategic highway network to the US defense capability. Are the nation’s railroads also important? Given the recent disastrous derailments, should also note investments needed in our railroads.

Page 25 highlights GBNRTC’s commitment to meeting the requirements of Title VI. Every GBNRTC / NFTA transit survey shows a disproportionate representation of poor and minority populations on transit. (Niagara Frontier Transportation Authority Transit Survey for GBNRTC, June 2017. This argues for focus on investments in better public transit.

(<https://static1.squarespace.com/static/56ccbbfd3c44d8670dbd1d84/t/594c18bb15d5dbb061b1eb9f/1498159346755/NFTA+2017+Onboard+Survey+FINAL+Report.pdf>)

Chapter 2

Figure 2.3 on Page 31 shows population group concentrations over regional thresholds. The key and descriptions on this chart are unclear and need to be better defined. Although the specifics of the chart are unclear, the patterns look familiar. We think this chart shows concentrations of poverty or minority populations. The implications for public transit investments are clear. The 2050 MTP should identify specific transit investments that will target these areas, such as and especially expansion of Buffalo Metro to the targeted areas (East Side / airport) and more frequent bus service.

Page 32 shows concentrations of private sector jobs and notes that it is difficult for those without cars to reach these jobs. This was quantified in the Partnership for the Public Good report “Working Toward Equity, Updated: Race, Employment, and Public Transportation in Erie County” July 2017. The potential for addressing these issues is quantified and the CRT’s “East Buffalo Airport Metro Rail Extension Analysis Report”, Updated 2022.

<http://citizenstransit.org/sites/default/files/CRT%20East%20Side%20Final%20Report-01112023.pdf>.



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The GBNRTC 2050 MTP should be more specific in how these issues will be addressed with appropriate investments in public transit.

Pages 33 and 34 identifies economic sectors (e.g., manufacturing, health and life sciences, tourism, etc.) and the importance of international connectivity with Canada as a major driver of economic development and cites the importance of cross-border connectivity.

Page 34 correctly highlights transportation components of the GHG emissions and notes the importance of reducing single occupancy vehicles, which make up 44% of private vehicles. The report correctly states the goal reducing vehicle miles traveled (VMT). We agree and believe the best way to achieve this is with public transit, especially light rail. A single Buffalo Metro 4-car train can remove all the cars in Figure 1 every 10 minutes (using the 44% SOV rate).

Page 36 correctly states that “creating an efficient, attractive, and affordable transportation system will promote increased utilization, reduce the use of highly polluting, car-focused modes of transportation, and ultimately, reduce GHG emissions...” We agree. Figure 1 above makes this clear. Unlike other regions, Buffalo already has a working light rail rapid transit system that be leveraged.

It is disappointing the 2050 MTP sections on the environment and environmental mitigation does not mention the NYS CLCPA / Scoping Plan initiative.

On Page 37 the project to cap the Kensington is noted as way to re-establish the green space originally provided by the Humboldt Parkway and undo the environmental harm from the Kensington Expressway. The capping proposal will do nothing of the sort. The capping plan is designed to carry the same number of cars of the current expressway, just underground with fans exhausting the pollution to the neighborhoods above. No reduction of VMT here! The saddest thing with this plan is that the original Humboldt Parkway could be restored using just the \$55M being provided from the feds (The Rochester Inner Loop filling cost \$30M). The NYS \$1B could be used to extend Buffalo Metro all the way to the airport and a park-&-ride near Transit.

Figure 2.8 in the 2050 MTP shows that the highest capacity mode (transit) supports the most person trips. Of course, this has a lot to do with our sprawl problem, we can make improvements in our urban areas by investing in public transit. The high volume of bicycle travel is surprising and encouraging.



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The 2050 MTP section of Safety on page 49 documents the numbers of crashes, injuries, and deaths from vehicle crashes. This section should also note the number of crashes and deaths from our public transit system, which will be miniscule. The high safety rate of public transit is too often ignored.

Page 50 states that innovative transit practices, like TNCs, will be needed to address the drop in transit ridership associated with the pandemic. We should also look at ways to encourage an increase in transit ridership.

Chapter 3

Page 59 cites the FAST Act as the first to use performance-based planning and notes the GBNRTC continues to use this approach. Should state whether the latest BIL legislation has any changes to this approach.

Chapter 4

Notes the NFTA Metro Expansion Project citing only the Amherst expansion, which is currently EIS evaluations. Should note that studies of other extensions are planned and important to the robustness of Buffalo Metro System. High priority future extensions are to the East Side and airport, and to the Bills Stadium. The NFTA 2018 Long Range Plan specifically called out a Southern / Eastern Light Rail Extension Study and the recent Bills Stadium Community Benefits Agreement identified the possibility of a rail station at the stadium. These possibilities should be noted even if they are long range and depend on future budgets and decision making.

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Chapter 5

It is difficult to compare the Constrained Project List by Strategy (Table 5.3) to the list in the 2018 version.

2018	2023	Description	Comment
Yes (#1)	MNT1	NFTA Metro Rail LRT Extension-Amherst Buffalo	Now \$1.7B (up \$400M)
	MNT2	Metro State of Good Repair	New
	MNT3	Zero Emissions Bus Purchase and Infrastructure Garage Enhancements	New
Yes (#5)	MNT4	Mobility Hubs	2018 also included bus fleet enhancements
	MNT5	Bailey Avenue High-Capacity Transit Enhancements	New
	MNT6	NFTA Bus-System-Wide High-Capacity Transit Enhancements	New
Yes (#6)	MNT7	DL&W Metro Rail Station	
Yes (#4)	MNT8	Buffalo CBD, Niagara Falls and Villages -Smart Parking	
	MNT9	DL&W Access Improvements	
	MNT10	Commuter Shed EV Charging Demonstration	
Yes (#3)	No	High Quality Public Transportation to BNIA	Only had \$63M budget
Yes (#2)	No	NFTA Bus Service Optimization	Only had \$22M budget. Same as MNT2, which has \$200M budget

The highest priority project under the Regional Highway System Project list is the NYS 33 Kensington Expressway Project listed at \$1B. CRT strongly disapproves of this project as currently envisioned, which involves capping the existing highway to form a tunnel with a price tag of \$1B. There are so many things wrong with this plan it is hard to know where to start.

- It violates the spirit of the CLCPA / Scoping Plan and Erie County Climate Action Plan, which call for reducing VMT.



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- It would be possible to fill the Kensington trench using only the \$55M provided by the Feds (filling the Rochester Inner Loop cost \$30M).
- The pollution from the tunnel will be vented to the atmosphere using fans and vents, therefore no environmental improvement.
- Restoring Humboldt Parkway as a slow speed parkway would cause commuters who choose to drive to choose one of Buffalo's arterials (e.g., Broadway, Genesee, Walden, Main, etc.) restoring business to those routes.
- Restoring Humboldt Parkway would restore Olmstead's network of parks with full size trees and foliage, providing environment remediation.

Chapter 6

Table 6.1 shows the impacts of implementing the plan shows an increase in VMT, an increase in vehicle hours, an increase in transit share, a decrease in GHG.