

# Appendix 27

**Appendix 27**  
**Comments and Responses to NYSDOT Comments**  
**dated November 21, 2022**

This appendix provides detailed responses to comments from the New York State Department of Transportation dated November 21, 2022 regarding the Traffic Assessment. Each comment received is provided below, along with responses to each in italics.

1. COMMENT: Report should identify existing and anticipated operational and safety deficiencies before, during and after special events (off-site queuing, pedestrian facilities along all highways servicing the stadium, intersection operations, etc.).

*RESPONSE: On game and event days, thousands of cars and pedestrians are coming to the Existing Stadium Complex and surrounding area, which creates certain existing operational and safety issues. As noted on pages 4-6 of the Traffic Assessment dated October 2022 prepared by WSP USA, Inc. ("Traffic Assessment"), ten operational and safety issues on game and event days at the Existing Stadium were previously identified in a 2014 Traffic Impact Study commissioned by the Erie County Department of Public Works, along with recommendations to address each issue and status of whether such recommendations have been implemented. The issues are as follows:*

- 1) pedestrian accommodations on US 20A as currently pedestrians only use the shoulder;*
- 2) pre- and post-game capacity on US 20A to accommodate the game and event day traffic loads;*
- 3) high volumes of pedestrians on Abbott Road as sidewalks end shortly north of US 20 and only a worn path or asphalt strip exists, so pedestrians often spill into the street;*
- 4) need for coordination/communication of traffic control to handle the game and event day loads;*
- 5) driver confusion over which lanes to utilize for entering and exiting traffic;*
- 6) pedestrians crossing Abbott Road;*
- 7) pedestrians crossing US 20A*
- 8) parking operations causes delays at the US 20/Abbott Road intersection;*
- 9) off-site parking pedestrians; and*
- 10) traffic operations due to the closing of Abbott Road while US 20A is still a one-way eastbound.*

*Additionally, existing traffic, parking, and pedestrian operations and conditions at the Existing Stadium were assessed using pre- and post-game traffic and pedestrian observations from various sources, game day traffic information provided by NITTEC and Erie County, real-time traffic and pedestrian conditions using StreetLight data provided by GBNRTC, and pedestrian accident reports provided by Erie County. Because the New Stadium will be located across Abbott Road, the Traffic Assessment compared these existing operational and safety conditions*

*to anticipated changes in traffic, parking, and pedestrian patterns associated with the New Stadium. As shown in the Traffic Assessment, travel patterns and behavior associated with the New Stadium will largely resemble that of the Existing Stadium, including a similar number of occupants per vehicle, attendee arrival and departure times, methods of transportation, and the approximate distribution between Team lots versus secondary and tertiary lots.*

*As detailed in the Traffic Assessment, traffic arriving or departing from the Existing Stadium Complex has to travel on Southwestern Boulevard, Abbott Road, or Big Tree Road to access the majority of the on-Site and off-Site parking lot locations. The current capacity for the highways around the Existing Stadium Complex is 11,000-16,500 vehicles per hour for arriving traffic and 12,00-18,000 vehicles per hour for departing traffic. As detailed in the Traffic Assessment, pre- and post-event traffic patterns are very similar. Postgame, slightly more traffic can be seen using Southwestern Boulevard and Armor Duells Road to Rt. 219. The majority of traffic uses the roadways east of the Existing Stadium in both pre- and post-game conditions. Currently, Abbott Road, Southwestern Boulevard, and Big Tree Road handle the highest volume of traffic, most likely due to the accessible parking from these roadways. Pre-game conditions indicate a preference for drivers coming southbound on I-90 to use Rt. 219 and exit at either the Milestrip Road or 20A - Orchard Park exits. Milestrip Road handles traffic coming in from Route 5, I-90, and Rt. 219, where it is then distributed to Abbott Road, Southwestern Boulevard, or McKinley Parkway. There is a large convergence of traffic at the intersection of McKinley Parkway, Southwestern Boulevard, and Big Tree Road. For passenger vehicles, an occupancy of 2.8 persons per vehicle was assumed in the Traffic Assessment. The vehicle breakdown was as follows for the Team's game days, specifically: personal vehicles (19,625), bus/motor coach vehicles (277), limo vehicles (70), and RV vehicles (177). This breakdown did not factor in rideshare contributions and public transit.*

*Post-game conditions are relatively the same. Roadways on the eastern side of the Existing Stadium Complex still show higher volumes of traffic along Big Tree Road and Southwestern Boulevard, and even higher volumes on Rt. 219 than on I-90. Corridors that experience more post-game traffic than pre-game traffic include McKinley Parkway, South Park Avenue, Armor Duells Road, Union Road, Transit Road, Lake Avenue, and Webster Road. The maps from the Traffic Assessment suggest that travelers are more likely to find alternative routes after events than before. Eastbound traffic away from the Existing Stadium Complex is the highest directional volume, with eastbound Southwestern Boulevard, Big Tree Road, and Milestrip Road volumes combining for approximately 14,300 vehicle trips.*

*Existing on-Site parking lots are located on three sides of the Existing Stadium. Site constraints limit parking and access to/from the east due to Smoke Creek. Primary on-Site parking is provided via Bills/owner-controlled parking facilities directly adjacent to the Existing Stadium and across Abbott Road, shown in the figure as Stadium Lots. On-Site parking facilities quantified do not include the administrative staff parking, which create trips that occur outside of peak traffic periods on event days. Additional parking is provided at the ECC Campus. This includes general parking for patrons along with a dedicated rideshare lot for Uber/Lyft pick-up and drop-offs. There are numerous secondary parking facilities that include sizable, defined,*

*consistent formalized parking locations which are typically scattered within proximity around the owner-controlled parking. These secondary lots are available to the general public, although some do require advance reservations or have selected requirements for using. Lastly, a tertiary level of parking option is available, which includes private residence or property owner parking typically in front yards or in driveways. Of the 20,089 estimated available parking spaces, slightly more than half are located to the west of Abbott Road. Bills/owner-controlled and secondary lots were found to be highest to the east of Abbott Road. The concentration of parking at ECC Campus is fully located to the west of Abbott Road. Tertiary parking is balanced to the east and west of Abbott Road.*

*Additionally, as detailed in the Traffic Assessment, during construction of the New Stadium and demolition of the Existing Stadium, there will be a temporary reduction in the available number of on-Site parking spaces. However, all construction vehicle parking and staging will be accommodated on-Site. Site preparation, construction of the New Stadium and demolition of the Existing Stadium will generate temporary construction related traffic for workers and product delivery and deconstruction. At peak, it is estimated that upwards of 1,000 to 1,200 construction workers are anticipated to travel to the Site. However, this peak would only occur for no more than a 10-month duration during the off-season.*

2. COMMENT: Assess opportunities for mitigation for any identified problems.

*RESPONSE: The Existing Stadium Complex follows a Traffic Management Plan (“TMP”) on game and event days. The goal of any TMP is provide safe and efficient flow within a given area, to reduce vehicle/pedestrian conflicts, create a safer space for pedestrians, ease congestion and delays, and provide real time traffic data for motorists. As part of the SEQRA review of the Project, the TMP was updated and, for the first time, reduced to writing. As noted in the TMP, traffic management for Game Day and other events is reviewed at the end of the Team’s season to discuss any changes necessary for the coming year, and then again before a season starts (this is a new practice that will be implemented at the end of the 2022/2023 NFL season). It is anticipated that updates to the TMP will occur as operations are reviewed routinely to determine adjustments to the TMP, review physical conditions of pedestrian walkways, and determine options for improved roadway and pedestrian operations. The TMP will remain in place for the New Stadium and will be reviewed and updated as necessary.*

*Additionally, the design and operation of the New Stadium Complex will include several features that are expected to improve the traffic, pedestrian, and parking conditions associated with game and event days in the area, including:*

- Construction of the New Stadium on the west side of Abbott Road allows for a more equally distributed traffic pattern into and out of the Site as compared to the Existing Stadium, which constrained on the east side by Smoke Creek.*
- A new driveway on the west side of the Site that will provide a new connection between Southwestern Boulevard and Big Tree Road, providing additional options for redistributing traffic and providing additional vehicular and pedestrian access on the*

*west side of Abbott Road. This will allow for a more balanced ingress and egress from the Site.*

- Several new driveways to new and existing parking areas to improve ingress and egress and help reduce queuing on roadways. These new driveways include one new driveway connection along Southwestern Boulevard, east of the existing ECC Campus driveway, and two new driveway connections to Abbott Road, south of the New Stadium, which will provide increased access opportunities to the new parking areas to the south of the New Stadium and the secure parking zone adjacent to the New Stadium. Additionally, a partial new internal roadway connection on the west side of the New Stadium parking lots will provide enhanced connectivity for ingress and egress to the proposed parking lots on the west side of the New Stadium.*
- The New Stadium will incorporate several new internal walkways to enhance pedestrian conditions. Pedestrian walkways have been designed in a radial pattern following line of site approaches to the New Stadium. Internal walkways have also been located to limit potential conflicts between vehicles and pedestrians, directing pedestrians to dedicated walkways and away from vehicle drives, and will be appropriately lit. Existing sidewalks, pedestrian walkways and accommodations provided on-Site to the east of Abbott Road will remain and are detailed in the TMP. Pedestrian corridors will be maintained along Big Tree Road (east of Abbott Road) and Abbott Road (north of Southwestern Blvd) during game days. And the closure of Abbott Road for pedestrian accommodation pre- and post-game as part of the TMP is planned to continue, along with the other measures detailed therein that have been highly effective in ensuring pedestrian safety.*
- Beginning during the 2022 season, NFTA is piloting game day service that would operate between several locations across Western New York to a passenger drop-off on Abbott Road, with different service times to accommodate both employees and patrons. Preliminary results from this pilot service showed that riders utilized nearly all of NFTA's pickup/dropoff locations and it is anticipated that this new direct service will be continue on game days with the New Stadium.*

*Furthermore, during construction of the New Stadium and demolition of the Existing Stadium, construction worker traffic using passenger vehicles constitutes the primary construction related traffic generated. This traffic will occur outside the peak traffic period – starting earlier than morning peak, and shift change (if there is a second shift) occurring prior to afternoon peak period. At peak, it is estimated that upwards of 1,000 to 1,200 construction workers could be anticipated to travel to the Site, however, this peak would only occur for no more than a 10-month duration during the NFL off-season. Construction related traffic will not increase traffic generation on a game day. Through the use of car-pooling and new transit options, the actual number of vehicles generated would be less than the number of workers. Traffic distribution patterns approaching the Site during construction will be similar to game-day conditions, and construction workers will approach the Site using Southwestern Boulevard, Abbott Road, and Big Tree Road. Due to the internal construction site configuration, the primary access gates will be those located on Abbott Road and it is anticipated that a majority of construction worker vehicles will utilize those gates to enter and exit the site. The access gate on the ECC Campus*

side will provide a secondary access point to the construction site for workers approaching from the southwest. The construction related traffic trips will be temporary, minor, and will conclude as the stages of construction are completed.

3. COMMENT: Provide detailed information on the site plan and proposed plans for managing traffic before, during and after special events

RESPONSE: Please see response to Comment 2 above.

4. COMMENT: The traffic management plan shown in the report appears to accurately reflect the plan for the existing stadium. The document does not address any revisions required for the relocated stadium. NYSDOT will work with County officials in the coming months to address a revised TMP for the new stadium.

RESPONSE: Acknowledged. As noted in the TMP, and in response to Comment 2 above, a new practice that will be implemented at the end of the 2022/2023 NFL season is to review the TMP at the end of the Team's season to discuss any changes necessary for the coming year, and then again before a season starts. It is anticipated that updates to the TMP will occur as operations are reviewed routinely to determine adjustments to the TMP, review physical conditions of pedestrian walkways, and determine options for improved roadway and pedestrian operations. The TMP will remain in place for the New Stadium and will be reviewed and updated as necessary.

5. COMMENT: In the Executive Summary document, Section III "Analysis of Environmental Impacts", subsection 3.G "Impact on Plants and Animals" states, in part, "...there are no significant natural habitat present, nor any threatened or endangered species...". Section 4.0 "Threatened and Endangered Species" in Appendix 8 (Ecological review), mentions the Northern long-eared bat (NLEB) as being federally listed, but does not mention that it is automatically state listed due to the federal listing. The state listing should be noted in the documents, and it should also be mentioned that coordination with NYSDEC is required since the Ecological Review states that there will be tree cutting.

RESPONSE: The NLEB is both a state and federally listed species. While the United States Fish and Wildlife Services includes the NLEB within the Project area, NYSDEC does not. Thus, no consultation with NYSDEC is required. Additionally, we note that the NLEB requires substantial blocks of forest for their habitat, which is not present within the Project area. That being said, it is recommended that any tree cutting occur during the winter months (November to March), if possible, to avoid any potential direct impacts to any bat species.

6. COMMENT: The preliminary proposed Stormwater Management Plan for the project has been completed. We have no comments at this time.

RESPONSE: Acknowledged.

7. COMMENT: NYSDOT Highway Work permits will be required prior to construction.

*RESPONSE: Acknowledged.*