



ANDREW J. RUDNICK,
PRESIDENT & CEO

November 12, 2007

Mr. Alan E. Taylor
Regional Director
NYSDOT Region 5
100 Seneca Street
Buffalo, New York 14203

Dear Mr. Taylor:

On behalf of the Buffalo Niagara Partnership, the region's largest business organization representing 2,500 employers, I thank you for the opportunity to submit comments in response to the Peace Bridge Expansion Project Draft Environmental Impact Statement (DEIS).

The Partnership believes that the Peace Bridge should provide reliable, predictable and efficient access between Buffalo Niagara and Southern Ontario resulting in the steady flow of goods and people across the border. While we would have much preferred to see Shared Border Management embraced by the Bush administration and implemented by both the US and Canadian governments, we realize that this is not an option for the foreseeable future. With Shared Border Management off the table, and faced with continued congestion, processing and security issues made worse by the current – long outdated – configuration of the US plaza, the Partnership supports Alternative # 1 as presented in the DEIS and urges officials in Washington and Albany to move on it quickly, constructing a new Peace Bridge span and US plaza.

The importance of a reliable, predictable and efficient flow of goods and people across the Peace Bridge for the Buffalo Niagara region cannot be understated. Consider the following, as presented in the DEIS:

- In 2005, the Peace Bridge accounted for \$30.6 billion in trade value to and from Canada
- Freight transported across the Peace Bridge is linked to \$166 billion in business sales annually, over 1 million jobs, \$48 billion in household income, and \$13 billion in federal tax receipts
- Currently, along the Niagara Frontier corridor, the Peace Bridge accounts for 57% of commercial traffic, while the Lewiston-Queenston Bridge accounts for 43%. By contrast, in 1998 the split was approximately 61% to 39%, suggesting that current lack of bridge capacity and congestion have forced traffic toward alternative crossings.

Furthermore, the Buffalo Niagara region relies heavily on its border crossings in order to take full advantage the economic benefits of our proximity to Southern Ontario's growing population:

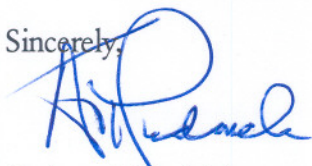
- Based on 2005 annual passenger traffic and updated survey estimates of traveler direct spending, travelers from Ontario and other origins west of the Peace Bridge, spend an estimated \$235 million annually in the U.S., about \$133 million of which is accounted for within the Buffalo-Niagara Falls MSA.
- Spending by travelers across the Peace Bridge accounted for approximately \$186 million in total output (business sales) within the Buffalo-Niagara Falls regional economy, approximately 4,400 jobs, \$68 million in household income, and \$4.7 million in local tax revenues. The direct, indirect and induced effects of these travelers' spending elsewhere in New York State accounted for an additional \$107 million in business sales, 2,060 jobs, \$39 million in household income, and \$5.3 million in local and state taxes.
- Historical high values for the Canadian dollar led to an increase in Canadian visits to the United States by 7.6% in 2006. Yet, despite the fact that the Peace Bridge is the second busiest border crossing between the U.S. and Canada, its volume failed to grow - and in fact, fell slightly - during the same time period.

As you well know, a significant portion of Buffalo Niagara's economy is based on this region being a bi-national community. We are, therefore, extremely concerned about changes at CanAm border crossings, especially as they hinder the flow of goods and people. Of late, the strong Canadian dollar has made shopping in border regions like ours very attractive to Canadians. However, Buffalo Niagara's retail stores, airport and our cultural and sports venues have seen only marginal increases in Canadians; increases which are nowhere close to the dramatic influx of Canadian shoppers experienced the last time the two currencies achieved par. The most obvious explanation for this is the ongoing, widespread confusion regarding required identification, and the long delays at our border crossings.

All of these matters adversely affect our region's economy. Thus, the Partnership is working with the Western New York congressional delegation and the Spitzer administration to address the documentation issues, and we believe that construction of a new Peace Bridge span and plaza will address concerns related to reliability, predictability and efficiency of access across the border.

The statistics are difficult to ignore - both the significant economic impact of the Peace Bridge on our region, and the continued damage to be done should current inefficiencies and inadequacies at the crossing remain unaddressed. For these reasons, the Partnership supports Alternative # 1 moving forward expediently, with the result being a new Peace Bridge span and US plaza.

Sincerely,



Andrew J. Rudnick