

# Parkside Community Association

2318 Main Street Buffalo, New York 14214-2323 716-838-1240  
www.parksidebuffalo.org



December 18, 2017

Mr. Craig Mozrall, PE  
Special Projects Manager  
New York State Department of Transportation Region 5  
100 Seneca Street  
Buffalo, NY 14203

RE: Scajaquada Corridor Project PIN# 5470.22

Dear Mr. Mozrall:

The Parkside Community Association does not support the current plans submitted in the Final Environmental Impact study for the NYS 198, Scajaquada Corridor project. Our community has provided detailed responses to the NYSDOT throughout the project and feels that our input has been ignored and disregarded.

The current plan continues to segment neighborhoods and segment populations in the same way as the original design. Additionally, the NYSDOT has decided to segment the road eliminating the eastern and western ends that are crucial to reconnecting communities, improving safety, improving impacts on health, and creating a vision that the community can support. The social, health, and economic negative side effects of the 198 are well-documented, and the current plan only perpetuates these conditions.

This project has failed to create a vision that the community supports, and our organization cannot and will not support the plan. We call on the NYSDOT to halt the current project and start a new project fresh with a vision the community supports and guides the design moving forward. We have attached our response to the DEIS from which we issued on February 8, 2017. We stand by the positions communicated in this response and feel they are all relevant to the current FEIS.

Sincerely,

A handwritten signature in cursive script that reads "Eric Harvey".

Eric Harvey  
President, Board of Directors  
Parkside Community Association

Enclosure

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Tuesday, August 22, 2017

Mr Craig Mozrall, PE  
Special Projects Manager  
New York State Department of Transportation Region 5  
100 Seneca Street  
Buffalo, NY 14203

## **Re: Scajaquada Corridor Project PIN# 5470.22**

Dear Mr. Mozrall,

The Parkside Community Association, Inc., ("PCA") once again welcomes the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for New York State Route 198, ("Scajaquada Corridor.") As presently proposed, our community cannot and will not support the design or approach that had been shared by the New York State Department of Transportation ("NYSDOT") during its August 8, 2017 presentation. We stand united with Mayor Byron Brown in calling on the NYSDOT to "restart the dialogue with a fresh perspective..." (February 8, 2017 DEIS response).

When Governor Cuomo announced his vision for the proposed project in April 2016, he stated that the state was "reuniting our communities" along with "taking a new approach to transform this region's transportation network into a 21st century model for progress, and revitalize our state parks to meet the needs of the next generation" through "restoring the visionary design of our parks and roads that was lost decades ago...." We strongly support the governor in this vision however, we believe that the current proposed design falls short of this vision as it does not reconnect our communities, restore the park, or create a visionary design for the next generation.

The PCA and our members have been dealing with the consequences of Scajaquada Corridor since its construction in the 1960s and the current proposed design falls exceptionally short of any meaningful reconnection of neighborhoods. The decision by the NYSDOT to reduce the study area two years ago by eliminating the areas east of Parkside Avenue and west of Grant Street the NYSDOT has continued the same segmentation of the community that was created with the original 1960 project. During this vital time in our country we look at this project as a opportunity to reconnect communities, provide opportunities for all members of society, improve the

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environmental conditions, and expand on our great successes in Buffalo. This project, as currently proposed, cannot achieve these goals.

A significant and ongoing community dialogue has been underway on this project since 2005 and throughout this process we have hit roadblocks with the NYSDOT we believe due to the addition of the last line of the Purpose and Needs statement which reads as follows: "The conversion should not significantly erode the existing level of service provided along the corridor or on the surrounding roadway network." This line was not part of the community supported EPP and we believe has led to oversized intersections, medians, limited bicycle infrastructure, limited pedestrian connections, and the reduction of project area. The most egregious example of this approach is the Delaware Avenue intersection. This intersection is comparable in size to the intersection at Niagara Falls Boulevard and Sheridan Drive. The intersection design being proposed in the NYSDOT plan is under twenty (20) yards from the pedestrian area of the Delaware Park Ring Road and under fifty (50) yards from the Delaware Park soccer fields. These soccer fields are a major source of activity and used throughout the summer by Delaware Soccer Club; Club members include children from the age of three (3) to teenagers. The thought of placing a seven (7) lane intersection at this location is not only appalling, but also, creates many health and quality life concerns for the children and adults like who engage in recreational activities in Delaware Park. The PCA supports the approach presented by the Olmsted Conservancy. We believe that developing a design for the Delaware Avenue and Scajaquada Corridor intersection, that is not at odds with the context of the surrounding Delaware Park, is critical as defined in the project's Purpose and Need Statement. Creating a project at this location that sets the tone for the rest of the corridor offers an opportunity to provide the community with a tangible vision for the future.

The PCA wholeheartedly withholds all support for the NYSDOT's DEIS current proposal to create a suburban-style "Scajaquada Boulevard" as it fails to address the segmentation of our neighborhoods, as well, as the health and safety of our residents. For decades the PCA has advocated for a plan that is appropriate for neighborhoods and parks. These basic objectives have not been met by the NYSDOT's proposed design. Instead, the proposed design continues to perpetuate the difficulties and hazards of a limited access expressway, despite having a 30 MPH speed limit.

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Our concerns have not changed since our response to the DEIS in our February 8, 2017 letter. We have listed them below again:

- Its **prioritization of vehicle traffic over the health, safety, and the social and environmental setting**. It is a hazard to motorists, residents, pedestrians, cyclists, as well as the young, elderly, and disabled. This is due to:
  - Egregiously over-sized intersections;
  - The lack of consistent and dedicated bicycle infrastructure;
  - The lack of vegetative buffers to traffic pollution in the most densely inhabited portions of the corridor, despite having ample space, funding, and need to include them;
  - The failure to plan for potential mass transit options along the corridor;
  - Medians at the expense of park space, parking, and on-street bicycle facilities;
  - The failure to comply with the directives laid out by New York State and the City of Buffalo's complete street policy;
  - Adverse impacts upon the Historic Olmsted Park and Parkway System, including the continued barrier between the Delaware Park Meadow and Hoyt Lake as well as the obliteration of Agassiz Circle and Humboldt Parkway;
  - Adverse impacts upon the numerous surrounding cultural, historical, and educational institutions, especially our world class park system, historic battle fields, and War of 1812 cemetery;
  - The slipway into Delaware Park encourages high-speed, cut through traffic at the expense of the safety of park goers;
  - The general "roadway design" for traffic traveling 40 MPH or greater induces speeding in some while luring others into distraction. The results of both, especially in the same space, will be disastrous. Properly designed city streets require no guard rails or medians;
  - The plan's limited scope, including the absence of addressing impacted communities west of Grant Street and east of Parkside Avenue.
- Its **failure to meaningfully engage the public's concerns**. NYSDOT has ignored and omitted numerous public comments by community members and organizations in both the Project Scoping Document and the DEIS.

The PCA has offered numerous comments over the past 15 years concerning the project. At every step of the way we have requested comprehensive engagement in the process to assist NYSDOT in creating the most improved and mutually beneficial corridor possible. Before the PCA can support any plan to transform the Scajaquada Corridor, NYSDOT needs to address the community's priorities and demonstrate that this project will have a positive impact on economic development, public health, social equity, environmental

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sustainability and the quality of life of all affected residents. An investment of this magnitude on the Scajaquada Corridor will be one we will live and die with for the better part of a century. How well we meet the goals and objectives of this project will be a large part of our generation's legacy. We have suffered the disastrous impacts of decisions made in the 1950s along this corridor long enough. We look forward to further dialogue with NYSDOT on the development of a project we can all support moving forward. We also pledge to continue our efforts for just and equitable transportation infrastructure through and beyond the outcome of this project.

Sincerely,

A handwritten signature in black ink that reads "Michael DeLuca". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Michael DeLuca, AIA, LEED ap  
Parkside Community Association Board Member &  
Chair of the of the Traffic Committee

cc: Matthew Driscoll, NYSDOT Commissioner  
NYS Senator Chris Jacobs  
NYS Senator Timothy Kennedy  
NYS Assemblyman Sean Ryan  
NYS Assemblywoman Crystal Peoples Stokes  
Mayor Byron Brown  
Councilman Joel P. Feroletto  
Amber Small, Executive Director of the Parkside Community Association