December 21, 2017

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

RE: NYSDOT PIN 5470.22
Final Environmental Impact Statement

Dear Mr. Mozrall,

Thank you for the opportunity to comment on the NYS Route 198 (Scarpaquada Expressway) Corridor. Buffalo Niagara Waterkeeper is a nonprofit organization that advocates and stewards our region’s most precious asset, our fresh water. Part of our core mission is to ensure community access to, enjoyment of, and benefit from, the region’s freshwater resources.

While Buffalo Niagara Waterkeeper appreciates the NYSDOT’s significant investment into the promise of delivering a redesigned Scapaquada Expressway, we remain opposed to the currently proposed preferred build alternative (Alternative 2: Boulevard).

This latest alternative still does not respond to the transformative vision put forward by key project stakeholders, nor the community at large, a vision which has been shared with our State leadership for over a decade.

The community vision emphasizes creek restoration and protection; reestablishes neighborhood connections; reconnects waterfront to communities (especially to our cultural institutions such as Buffalo State College and the Albright-Knox-Gundlach Museum); restores our legacy park system; and encourages economic redevelopment. The community vision also restores and expands many alternative routes and modes for inner city travel, and this plan asserts that we once were, and once again can be, “the best planned city in the world.”

As with many communities in the nation we look forward to the complete removal of limited access highways within our downtown core. Although the Interstate system was created to connect major city to major city, it surely could not have been intended to bisect through and cause havoc to the very cities being connected. These highways that still cut through our urban fabric are doing great harm to once thriving communities, separating neighborhoods, parks and waterfronts, impacting waterways and lowering economic value wherever they go.

The Scapaquada Expressway is not the only highway segment with a negative impact to our city but it is one of the three worst. We have the opportunity of the century to change our course
right now, and to begin righting the damage done to our significant natural resources and quality of life.

Rather than continue to invest taxpayer resources into the segmental redesign of the Scajaquada Expressway (essentially just prettying-up what is still a limited access highway) we should instead focus on a complete redesign of our entire urban core transportation system, one phase at a time, toward a goal of restoring and expanding the versatile, humane, and accommodating “complete street” grid system.

Therefore, this redesign should focus on a walkable, bikeable, and “city-friendly driveable” urban grid restoration which will allow for the restoration of Scajaquada Creek, will restore Olmsted’s vision for Delaware Park, and will reconnect severed neighborhoods while restoring commerce and livability. There are significant investments into waterway health and ecological function underway, and ambitious plans for natural infrastructure restoration. In addition, the implementation of the Buffalo Blueway system will commence in 2018, but will be severely limited in the Scajaquada corridor if this current redesign is to proceed.

The very first step, and a big win toward improving the community, should be to turn our focus and the state’s investment into restoring Delaware Park. This can begin immediately, and has significant support from all the major cultural institutions and surrounding neighborhoods. This implementation strategy will also allow for simultaneous efforts to seek appropriate solutions in the remaining corridor sections and connections to the east and west.

Buffalo Niagara Waterkeeper looks forward to continuing to support and work with the NYSDOT, the community, and state and federal agencies to ensure that that the vision put forth by the community is realized.

Sincerely,

Jill Jedlicka
Executive Director and Waterkeeper
Buffalo Niagara Waterkeeper
(716) 852-7483 ex 21