



CITIZENS *for* REGIONAL TRANSIT

c/o Buffalo Place, 671 Main Street, Buffalo, NY 14203
716-691-8528 crtc@citizenstransit.org

NYS Department of Transportation
100 Seneca Street
Buffalo, NY 14203

July 1, 2026

Re: Queen City Forward (QCF) PIN 5512.61

Dear NYSDOT,

The main purpose of the pre-EIS process is to establish project objectives and goals. Our attached comments state Citizens for Regional Transit's (CRT) proposals for the purpose and objectives of the Queen City Forward (QCF) project. Feel free to call me if you would like to meet to discuss this.

CRT appreciates that NYSDOT no longer rejects out-of-hand the idea of fully restoring Humboldt Parkway. We hope this indicates that the primary objective of maintaining the uninterrupted flow of traffic within QCF will finally be reversed.

Thank you.

Sincerely,
Douglas Funke
Douglas Funke
President, Citizens for Regional Transit

cc: (Politicians): Mayor Ryan, Buffalo Common Council, NYS Legislators, Erie County Executive, Erie County Legislators, Federal representatives, and others.

cc: (Government): NFTA Managers, Queen City Forward Office, and others.

cc: (Interested parties, civic groups, and Community Groups): East Side Parkways (ESP) Coalition, Scajquada Corridor Coalition (SCC), Restore Our Corridor Coalition (ROCC), and others.



CRT Project Goals and Objectives Proposal for Queen City Forward (QCF)

Introduction

CRT agrees with NYSDOT’s policy of rethinking how to replace or renew aging highways.¹ The NYSDOT 2050 Transportation Master Plan references the Rochester Inner Loop East Highway that was removed in 2017 and replaced with an at-grade boulevard and bike lanes and notes the Syracuse “transformational Interstate 81 Viaduct Project” as examples of how to move forward. The report emphasizes the importance of fostering healthy, thriving communities. The NYSDOT 2050 Transportation Master Plan, states how NYSDOT plans to achieve accessible and affordable transportation choices by providing options that²:

- “Enhance options for travel and connections in ways that do not require vehicle ownership, particularly in low-income communities.”
- “Enhance public transit service and connections across services and shared mobility options...”
- “Encourage coordinated land use and transportation planning that increases destinations served by public transit, walking, and bicycling.”
- “Make investment to support access for all travelers, including older adults, youth, persons with disabilities, and underserved communities.”
- “Seek opportunities to reconnect communities that have been negatively impacted by transportation infrastructure such as highways and rail lines that create barriers to local access.”

NYSDOT How We’ll Get There goals are³:

- “Promote smart growth by strengthening the integration of transportation and land use planning...”
- “Enhance active transportation, public transportation, and other travel options so that so that a substantial portion of personal transportation in urbanized areas occurs by walking, bicycling, in public transportation and sustainable options like e-bikes and e-scooters.”

These guidelines are especially relevant to the QCF and Region Central Projects. Near-term actions must avoid working against long-term goals and plans. For example, implementing the

¹ New York State Transportation Master Plan 2050, pg. 17.

² New York State Transportation Master Plan 2050, pg. 9.

³ New York State Transportation Master Plan 2050, pg. 15.



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proposed Kensington cap and tunnel plan would make achieving the “How We’ll Get There” steps impossible.

CRT calls on NYSDOT to follow the New York State Master Plan 2050 for QCF. It will be a win-win for everyone.

Need

Much of the existing infrastructure of NY 198 and NY 33 is past its useful life. It is well past time to consider the options available.

Purpose

The primary purpose of the QCF project is to right past infrastructure wrongs that were created by the destruction of the highly successful Frederick Law Olmsted “City in a Park” concept. Urban highways failed to live up to their promise to relieve congestion. They merely relocated congestion, businesses, and residents away from the Central Business District to suburbs.

Objectives and goal

The Buffalo Olmsted Park System is celebrated as world-famous Frederick Law Olmsted’s and the nation’s first city-wide park and parkway system. In 1868, Olmsted and his partner Calvert Vaux proposed a connected network of 6 major parks, 7 parkways, and 8 landscaped traffic circles which the City of Buffalo largely implemented.

The Kensington and Scajaquada Expressways destroyed Humboldt Parkway, the crown jewel of Buffalo’s Olmsted’s parks and ways, and intruded into Olmsted’s beautiful Delaware Park. For a long list of reasons, restoration of Humboldt Parkway and removing the expressway intrusion into Delaware Park should be key objectives in QCF plans.

Other objectives CRT recommends for QCF:

- Reducing Vehicle Miles Traveled
- Reducing noise
- Reducing pollution
- Increasing safety
- Providing safe pedestrian and bicycle infrastructure
- Restoring lost generational wealth
- Restoring economic activity to city arterials
- Restoring lost tax base
- Restoring homes and businesses lost to NY-33 and NY-198 expressways
- Improving CSX bridge over NY-33 at Delavan



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Implementing the Region Central Plan in the Region Central planning area
Expand and implement Region Central planning techniques for all of QCF

The large map on display at the NYSDOT listening sessions is heart-wrenching. It is disturbing to the point of tears. The size and scale of the Kensington Expressway highway infrastructure is shocking from the ariel perspective.

The devastation and destruction caused by the construction of NY 33 expressway leaps off the map and punches you in the gut. The highway is massive. It dwarfs all other infrastructure of the City of Buffalo in the area displayed on the map. The impact of the destruction of Humboldt Parkway has not lessened over the years. People are still literally crying from sadness over the loss of the park and way. People have dedicated their lives to restore Humboldt Parkway. Some have died without realizing that goal. If only the voices of opposition had been heeded mid-20th Century, we would not have to deal with the urban expressways in the first place. Please do not repeat expressway mistakes.

Scope

CRT is pleased that NYSDOT is taking a broader approach to QCF than simply Best Street to Sidney Street on NY-33. At the listening sessions, NYSDOT made it clear to CRT that restoration of Humboldt Parkway is at least on the table to be discussed and investigated, which is consistent with the goals of the NY Transportation 2050 Master Plan. While the exact scope of QCF is still being formed, we hope NY-198 and NY-33 corridors from the Central Business District to Black Rock, to the airport, as well as northern and eastern suburbs are being analyzed and included in QCF's scope. CRT expects QCF to focus on NY-198's entire length, and NY-33 from Delavan Avenue to Elm and Oak Streets.

EIS organization

CRT understands that many alternatives must be considered in the EIS process, including at least one "do nothing" option. We endeavor here to provide some possible alternatives. CRT believes that although a wide geographic area should be considered in the project scope, that specific regions or zones should be recognized as having special objectives.

We think the following zones have specific needs and objectives within the overall project.



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Rt 198 between I-190 and Grant St.

Region Central plan calls for removal of the Rt 198/I-190 interchange but does not delve deeply into what should become of this tract. This area contains radioactive waste and is the most radioactive part of the City of Buffalo. Is remediation required? This land is not part of Olmsted's park and parkway system. Should some of this parcel be added to the park system?

Rt 198 between Grant Street and Elmwood Avenue.

This land is part of the Olmsted Park system and is not supposed to have highway infrastructure. Should this highway infrastructure be removed? We think so. What should replace the highway? This needs to be evaluated.

Rt 198 between Elmwood Avenue and Delaware Avenue.

This land is part of the Olmsted Park system and is not supposed to have highway infrastructure. In this stretch CRT recommends that all highway infrastructure be removed and replaced with park land with its original bicycle infrastructure to be restored.

Rt 198 between Delaware Ave and Agassiz Circle.

This land is part of the Olmsted Park system and Forest Lawn Cemetery. It is not supposed to have highway infrastructure. Trying to restore the original alignment shown below in Figure 1 would seem to be an impossible task. CRT suggests removal of highway infrastructure between Elmwood Avenue and Delaware Avenue. Region Central suggests a street connection between Delaware Avenue and Agassiz Circle, but not through the circle. We think this proposal is worth studying more.



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Figure 1 Delaware Park in 1915

Agassiz Circle

Agassiz Place was the grand entrance to Olmsted’s Park (now Delaware Park). Agassiz Place (now Agassiz Circle) should be the centerpiece of QCF. Symbolically, replacing the pavement here with something that symbolizes Olmsted’s crown jewel would restore Buffalo’s image as a city that respects itself.

Agassiz circle should be redesigned. The experience of everyone who traverses this space should understand from its design that this is the epicenter of Olmsted’s vision; that Agassiz Circle is Olmsted’s tribute to Buffalo. It is also aligned with the goals of New York’s 2050 transportation Master Plan.

Olmsted did not consider automobile traffic in his design of Agassiz Place. The future design should provide a user experience that treats automobiles, bicycles, scooters as equals. Pedestrian safety should be prioritized over other traffic. The design should leave no question in visitor minds that this is classic park land.



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Questions that need to be answered are:

- Should the original radius of Agassiz Circle be restored?
- Should there be a bike track?
- Should commercial vehicles be allowed?
- Should the west side connect directly with Delaware Avenue as proposed by Region Central?

Humboldt Parkway

Olmsted designed Humboldt Parkway as a linear park having two distinct segments:

- The Park Approach, between Agassiz Circle and Main Street
- A park and way between Main Street and the Science Museum

Approximately 60 upper-middle class residential buildings were destroyed for the expressway. The QCF project must include provision for their replacement. These homes would start at \$1 million and up in today's market. Residences restored to Humboldt Parkway are most definitely not "affordable" or low-cost properties. These 60 homes would be "market rate." Being able to purchase a new-build home on an Olmsted park and way would be a once-in-a-lifetime opportunity and would command top dollar.

CRT has seen design sketches that include commercialization of the parkway at cross-throughs. It is imperative that when traversing Humboldt Parkway at cut-throughs that it is clear from the design that Humboldt Parkway is park land and there is to be no commercialized uses. Cross-throughs must provide the feel of being in a park by design.

The Approach

Olmsted designed Humboldt Parkway with a 200-foot right-of-way having two park roads and an 86-foot-wide median holding tulip trees (magnolias). The approach connects Main Street with The Park (Delaware Park). This section of Humboldt Parkway was designed to handle more traffic and parking for The Park than the rest of the parkway. The purpose of this stretch of park land is to welcome visitors to The Park (Delaware Park).

The Humboldt linear park and way

The section of Humboldt Parkway between Main Street and Humboldt Parkway to the Buffalo Museum of Science is also a 200-foot-wide right-of-way with an 86-foot wide median. Frederick Law Olmsted specified the median is to be filled with rows of towering basswood (Linden) trees.



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When it comes to restoration of Humboldt Parkway, CRT wants to go a-la-carte. The Olmsted design included a racetrack attached to Humboldt Parkway. CRT does not propose restoring the racetrack.

Historic records show that because Humboldt Parkway is a long straight-away with a gentle bend the original design encouraged speeding and racing – even before it was paved! The need to design Humboldt Parkway with modern traffic calming methods such as curb bump-outs at cross-throughs and speed bumps. This park way should look and feel to motorists like it has a 20-mph speed limit and that motorists should slow down when crossing through. Our suggested cross-section would have an on-street parking lane next to the residences, a center travel lane, and another parking lane that has alternate parking to allow for passing trash trucks and for snow removal. Where the Olmsted design called for bridle paths, CRT calls for bike paths.

The Fruit Belt Segment

CRT calls the section between Oak Street and the Buffalo Science Museum the Fruit Belt segment. The expressway infrastructure in this section is formidable. Acres of land are involved.

Nearly 600 homes and businesses were destroyed in the Fruit Belt for the expressway. Deconstruction and replacement of existing highway infrastructure is needed. Today, developers are eager to rebuild. A low-rise mixed-use housing project is underway for Grey Street. To the best of our knowledge, a comprehensive plan for the Fruit Belt has not been established, A large planning effort that considers Olmsted’s city in a park concept and the desires of the neighborhood is needed for this stretch of the QCF to determine the best highway replacement scenario.

I-90 On/Off Ramp and Airport Access

The portion of NY-33 east of the current interchange with NY-198 leading to I-90 and then the Buffalo Niagara International Airport is another section of highway that needs to be considered in QCF. The Region Central plan explains how this stretch might work to connect using Kensington Avenue to provide east-west access to North Buffalo, Parkside, Trinidad, Grider, Hamlin Park, Cold Springs, and nearby neighborhoods to Interstate 90 and the Buffalo Niagara International Airport.

This long on/off ramp goes through a large cemetery. The possibility that changes should be made needs to be examined. Clearly, the western portion needs modification to fit the Region Central plan and to allow restoration of homes on Humboldt Parkway. If the chasm is filled in, what should become of the railroad bridge that is woefully out of date? This bridge is too narrow



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for bi-directional freight service. It seems that now would be a good time to address the railroad bridge's future with an eye to possible future restoration of passenger service on the Belt Line.

Goals

Reconnect the many communities split by the expressways.

The Kensington Expressway disconnected Delaware Park from MLK Park. It separated Parkside, Hamlin Park, Grider, Kinglsey, and Trinidad neighborhoods. The Kensington Expressway split Willert Park in two and destroyed the Fruit Belt. These neighborhoods have been isolated for more than 60 years. It will take a lot of effort to reconnect these neighborhoods. The goal of Restore Our Community Coalition was to reconnect Delaware Park with MLK Park, but many other connections also need attention.

Restore traffic and economic vitality to city streets made vacant by the expressways.

The main selling point of the Kensington Expressway was to relieve congestion in Buffalo's Central Business District. By that criterion the expressway lived up to expectations. Traffic and congestion shifted from Downtown to I-90, I-290 and Main Street in Williamsville. Traffic was induced from City streets and arterials to the expressway, leaving businesses with insufficient traffic counts to sustain themselves. Empty streets led to speeding and unsafe driving, which caused the City to spend millions on traffic calming measures and to address excess capacity resulting in reduced lane miles. Steps should be taken to restore traffic to city streets, which will lead to increased economic activity in the city and disperse traffic demand across Buffalo streets and arterials.

Improve safety

Speed kills. Removing the expressways will slow traffic considerably resulting in fewer deaths.

Economic Revitalization

Returning acres of land to the community will support infill development, new housing, and neighborhood reinvestment. The EIS must include actions to combat gentrification effects without negating restoration of lost generational wealth. Restoration of lost generational wealth is reparations for the entire East Side.

Improve health outcomes

The negative health effects of living on a depressed expressway are drastic. One could conclude that depressed expressways point truck and bus exhaust directly at homes along the route causing disease and death of the neighboring community. Eliminating depressed highways is a key goal.



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Reduce Vehicle Miles Traveled (VMT)

Reducing overall VMT should lead to improved air and water quality throughout the QCF project area. Transit is the most important tool to reduce VMT while increasing travel throughout the region.

The Planning Process

CRT has participated in Region Central, NFTA, and City of Buffalo planning. We think the best approach is to involve peer groups such as The Olmsted Parks Conservancy, GoBike, CRT, East Side Parkways Coalition, ROCC, neighbors, businesses, property owners, students, seniors, and many other identifiable groups and engage them using directed charettes. Stakeholders bring considerable knowledge and lots of passion. CRT has seen our input incorporated into light rail rapid transit plans, transit oriented development plans, housing plans, and others. It is fun and rewarding to see involved people participating and then seeing their ideas become adopted in final designs. LISC and other organizations have facilitated these sessions. We hope they are utilized in the upcoming EIS process. CRT can attest that thoughtful participation leads to better project outcomes.

CRT believes evaluating traffic conditions using the 5 Level of Functional Service (LOS) criteria should be just one factor in determining overall impact of whatever project comes to pass. The LOS tool treats pedestrian and bicycle traffic as deleterious and unimportant. Region Central notes that more than 30% of all trips are made by walking. In some neighborhoods 30% of households are carless. QCF must treat these populations with the same respect as motorists. Including a requirement of free-flowing traffic as an overriding project objective is simply wrong-headed in our opinion. The non-motoring population pays taxes and is entitled to be treated with as much respect as motorists.

What follows is formatted as a list of mini-EIS options. We have numbered CRT proposed alternatives as follows:

1. Do Nothing
 - a. Abandonment
 - b. Traditional do nothing
 - c. Privatization
 - d. Project 2025
2. Highway cap and tunnel
3. Highway to boulevard
4. Highway to Light Rail Rapid Transit or Bus Rapid Transit
5. Fillmore Ave. Substitution
6. Deep tunnel under the Scajaquada drain and Scajaquada tunnel



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7. Elevated on a berm
8. Full restoration of Humboldt Parkway

1. Do Nothing

Every EIS must offer a “do nothing” option. CRT offers four “do nothing” options:

1a. Abandonment

This version of “do nothing” is advocated by those who want to cut government spending to zero. These people would stop all government spending on NY-198 and NY-33. They advocate continuing use of the highways as-is making no changes or maintenance to infrastructure.

This option has severe negative environmental effects. At some point, the retaining walls of the sunken portions of NY-198 and NY-33 will collapse, as will the bridges. This would be a disaster for the City of Buffalo and would produce a dangerous eyesore. CRT opposes abandonment.

1b. Traditional do Nothing

A traditional version of “do nothing” involves maintaining the highway as-is by NYSDOT into the indefinite future. This “do nothing” option is advocated by those who like the current alignment, infrastructure, government financing, NYSDOT ownership and control of the highway. There would be no highway cap or any significant changes.

Unfortunately for those wanting this option, wear and tear has taken its toll on highway infrastructure. Bridges are already long past their intended service life. The retaining walls of the Humboldt stretch are in unrepairable condition. This “do nothing” option is impossible because the infrastructure is no longer maintainable. It is past the point where it must be removed or replaced.

CRT is against the traditional “do nothing” option because even if it were possible to take this path, the environmental harms, racism, and safety deficiencies currently caused by the highways need to be mitigated. It is not possible to reconstruct the highway to its current configuration because it does not conform to today’s construction standards.



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1c. Privatization

Some factions advocate divestment of government assets turning them over to private entities. The argument is that free-market forces should dictate what infrastructure gets built, and that the profit motive will drive infrastructure to its optimal condition.

Likely purchasers of highway infrastructure would be private equity firms. They would keep the highways open by cutting costs, eliminating required maintenance, and charging tolls. This is similar to abandonment, but with a twist where private equity would make money off the carcass of the highways. CRT opposes any such privatization scheme as a raid on taxpayer's taxpayers' investments.

1d. Project 2025

The Project 2025 model restores the pre-1950's Interstate Highway funding model. Under Project 2025, an agency such as the NYS Thruway Authority could obtain infrastructure federal funds for a project as a loan if it can demonstrate that the money would be paid back to the federal government like a 30-year bond. The NY State Thruway and the Grand Island bridges were constructed using this financing model.

The Project 2025 policy is that tolls and fare money would repay federal loans. For example, the cap and tunnel proposal for NY-33 could be federally financed if the state can show that tolls would repay the cost over 30 years.

Project 2025 encourages public transportation projects because unlike most highways, transit generates revenue from per-use activity. Congestion pricing (tolls) are consistent with Project 2025 and Heritage Foundation thinking, although the Trump administration has cold feet when it comes to advocating for tolls.

2. Highway Option – Cap and Tunnel

Around 2008 NYSDOT engaged with UB and ROCC and recommended a cap and tunnel option as the preferred way to deal with the sunken portion of the Kensington Expressway in Humboldt Parkway's median. The cap (or lid) idea was modeled upon Seattle's Freeway Park, which opened July 4, 1976. Freeway Park was designed by landscape architect Lawrence Halprin. The park has concrete planters and waterfalls to create a "forest" feel hoping to mask the noise of the cars below. Freeway Park is especially appropriate as a precedent for Buffalo because it is one of the only cap projects whose purpose was to build park land rather than promote development.



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The cap and tunnel option is government funded with government ownership and control. The Freeway Park model has Washington State DOT responsible for the highway portion of the project, but responsibility for care and maintenance of the cap is ambiguous.

When NYSDOT, ROCC and UB’s School of Architecture and Planning first proposed the idea of capping the Kensington Expressway to restore parkland to Humboldt Parkway’s median, CRT supported the proposal as a poor compromise that handles traffic. The proposal sat on the shelf until 2022 when NYSDOT reactivated the Kensington Expressway project. CRT attended the NYSDOT held public meetings at the Buffalo Science Museum in 2022. Ten options were presented. The cap was promoted as the preferred option, but a very vocal audience supported option #10, which was to remove the highway and restore Frederick Law Olmsted’s Humboldt Parkway on the surface. By 2022, several highway projects country-wide involved removing urban highways altogether. Most highway caps replace highway infrastructure with surface boulevards with the idea of providing opportunities for developers, as was done in Rochester, NY. In Nearby Niagara Falls, portions of Robert Moses Parkway, which was really an expressway, and I-190 were replaced by park land keeping a slow speed parkway in places and full removal in front of Falls itself.

In 2023 a CRT board member went to Seattle to tour and evaluate Freeway Park, then 47 years old. A second tour was made by CRT in March, 2026. Freeway Park is only 2 city blocks long. It has a large elevation change. A few well-tended park planters are cared for by volunteer civic groups. There are areas suffering from years of neglect. None of the fountains worked during the CRT visits. The fountain pools were stagnant ponds filled with debris. There was poor drainage and flooded walkways. Discarded bicycles and trash were strewn about and were obviously there for a long time. The bathroom is an outdoor latrine. The roar from expressway traffic was surprisingly loud throughout Freeway Park. Some planters have never been maintained, as their design was flawed such that they are inaccessible for maintenance and are overgrown eyesores. These conditions are documented in [a CRT YouTube video](#).



In contrast, Buffalo’s Olmsted Park system including Delaware Park, MLK Park, and linear connecting parks and park approaches are meticulously maintained. The parkways opened in the early 1870’s. After 150 years of service, Olmsted’s parks and parkways are still treasures and points of pride, except for intrusion by expressways. The homes near Delaware Park and MLK Parks, and on Bidwell, Chapin, McKinley, and Lincoln Parkways are among the highest real estate values in all Western New York. The Buffalo and Erie County Botanical Gardens in South Park are world-class. There is beauty and serenity, yet the parklands including the park land in



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parkway medians are home to park uses such as picnics, rest & relaxation, golf, farmers markets, and occasional concerts by the Buffalo Philharmonic Orchestra.

Scajaquada and Kensington expressways destroyed the beautiful parkland in the Humboldt Parkway median and disrupted Delaware Park. Delaware Park's grand approach and grand entrance is gone. The approach to Delaware Park was spectacular with Tulip trees between Agassiz Place and Main Street, ripped out for expressways. The stately Linden (American Basswood) trees that lined the Humboldt Parkway's median parkland no longer exist. They perished in the name of "relieving congestion." The loss in property value, health, prestige, sense of community, and beauty was an unconscionably large price to pay to move congestion from downtown Buffalo streets to the I-90/NY-33/I-290 heavily congested interchange.

When the Kensington Expressway opened it directly competed for cars with I-190, which had congestion pricing in place (10 cent toll road). The Kensington (aka as the Humboldt Expressway) was free and was restricted to non-commercial traffic. Expressways poached cars from city streets and arterials leaving many with little traffic. Most businesses and many residents left city streets for the growing suburbs in the second half of the 20th Century.

The cap and tunnel proposal lost its CRT support over time. CRT even shared a board member with ROCC. We learned that ROCC's founders wanted to restore Humboldt Parkway but settled for the cap and tunnel option because NY state "wouldn't let them" have their preferred option of restoration of Humboldt Parkway.

No highway cap has the majesty of Olmsted's parkway median parkland in Buffalo. The 2023 NYSDOT cap and tunnel proposal made it clear that full-scale restoration of Olmsted's beautiful parkland median was not included. Considering the above, plus pollution, inequity, and health effects, CRT no longer supports the cap and tunnel option.

3. Highway to Boulevard

Converting the sunken portions of NY-33 and NY-198 to surface boulevards or arterials would impose the same traffic burden as the expressways on the residential properties lining Humboldt Parkway. Pedestrians and bicyclists would be endangered by traffic. Pollution and noise would not be remediated.

CRT disagrees with this option, but it repeatedly comes up in the conversation, so we are mentioning it here so we can expressly state our opposition... to this proposal.



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4. Highway to Light Rail or Bus Rapid Transit

Some think because NY-33 connects downtown with the airport that it is a logical choice for light rail rapid transit (LRRT). This is a bad idea because the NFTA owns a much more direct right-of-way to the airport that is far better suited for LRRT service. The NFTA-owned right-of-way is a straight line from downtown to the airport, which would result in faster service. The NFTA-owned right-of-way better serves areas that are currently underserved by transit. The NY-33 alignment duplicates the existing Metro Rail service, goes through a lot of cemeteries which have no potential for ridership or development, and is the longest way taking the legs of the triangle instead of the hypotenuse. Using the Humboldt Parkway/NY-33 alignment for transit to the airport is unsatisfactory to CRT.

While CRT appreciates the idea of improving transit, using Humboldt Parkway as a transit corridor is simply the wrong thing to do. We know that the parkway worked perfectly as a residential street, park and way before the expressways were installed. We know the Olmsted plan, where it has been followed and maintained, is an enormous success. CRT thinks Humboldt Parkway should not be used as a transit corridor or as an expressway.

5. Fillmore Ave. substitution

Another proposition we've seen is to substitute Fillmore Avenue as a replacement parkway to connect Delaware and MLK Parks. This proposition seems unsatisfactory on its face, yet it was seriously considered and even championed at one time. It is a desperate "do something" approach that is predicated on the immutable concept that the expressway must remain intact because of traffic concerns. We disagree.

6. Deep tunnel under the Scajaquada drain and Scajaquada tunnel

During public meetings, the idea of making the depressed portion of NY-33 even deeper to go under the Scajaquada drain was floated. Few are aware that there is a second set of water tunnels underneath the Scajaquada drain. To dig deep enough to get under both water conduits the top of the highway tunnel would be 90 feet underground. This option is impractical, way too costly, and risks damage to the existing water conduits.

7. Elevated on a berm

When originally proposed, an option for what is now the depressed portion of the Kensington Expressway was to have the pavement on an elevated berm. This would have continued the berm that exists east of Grider Street through to Oak Street. The berm option was rejected in the 1950's for many reasons which continue to be valid today. CRT opposes putting the expressway onto a berm through the city.



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8. Humboldt Parkway Restoration

It is readily apparent to CRT that the community neighboring the depressed portion of the Kensington Expressway overwhelmingly favors restoring Humboldt Parkway and completely removing the expressway components. Because these residents have suffered negative health effects from pollution and noise, we think they deserve more influence over whatever project happens than other populations.

At its simplest, removal of the expressway infrastructure and replacing it with dirt and trees, i.e., a surface park and way, is the least expensive way to move forward. Rochester's depressed, low-use inner loop section that was filled in with dredging for \$30 million is tantalizing. We think scaling Rochester's experience up for Buffalo must be considered the preferred approach. In addition to the successful result in Rochester, this approach was highlighted as a successful approach for urban highway removal in the NYSDOT 2050 Transportation Plan. Not only will this eliminate the Kensington urban expressway it will provide an opportunity for restoring Humboldt Parkway and Buffalo's Olmsted legacy as a "city in a park."

A key difference between Rochester and Buffalo was that a goal in Rochester... in was to provide opportunities for mixed-use housing in the expressway footprint. In Buffalo we want..., we're aiming to restore a park atmosphere that is not commercialized.

Concluding Thoughts

CRT is grateful to NYSDOT for actively seeking to include this community in the current EIS process. Their input was not properly considered in the NYSDOT environmental assessment of 2023. It is good that highway removal and Humboldt Parkway restoration is now "on the table."

Buffalo's NY-33 infrastructure is larger and more complex than Rochester. NYSDOT is correct for fretting about what will become of the 75,000-car daily count at Utica Street. This will need to be a focus of the redesign process. It is not a showstopper, but rather an opportunity. If portions of this traffic were redistributed across Buffalo's many arterials it would help to restore the successful East Side businesses that were on those arterials before all the traffic was stollen by the expressway.

CRT believes that the City of Buffalo's street grid can absorb all the traffic now on the NY33NY-33 and NY198NY-198. When Buffalo had more than twice its current population and no urban expressways, the street grid performed well. The city thrived.

Since the introduction of NY-198 and NY-33 expressways almost all of Buffalo's arterials and arteries have had lane reductions due to speed and safety concerns due to overcapacity. Many of



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these capacity reductions need not be reversed, as the city's population is less than half what it used to be before expressways. To claim traffic congestion will be unbearable after highway removal is unrealistic and is not the experience in other cities where urban highways have been removed.

CRT believes some streets may need to have capacity restored. When conducting traffic studies pre-expressway capacities should be considered, not the reduced capacities that resulted from "road diets" required by measures taken to reduce excess capacity. For example, lane reductions on Genesee Street, as well as portions of Fillmore Avenue and Kensington Avenue may need to be reversed. In most cases these reductions are from repainting the lanes. CRT thinks Genesee Street should be returned to NYSDOT control and be completely rebuilt.

Fortunately, the corridor likely to be most affected by removing NY-198 and NY-33 expressways, Main Street, now has Metro Rail. Metro Rail provides this corridor more capacity than Main Street ever had, even when there were street cars. Main Street "road diet" construction underway is made possible because Metro Rail provides enough alternative capacity.

Getting thousands of people to change their habits after 70 years of having the expressways is no small ask. Prior to the 1950's, rail transit was the preferred way to get around. Streetcars provided the highest capacity on city streets. Metro bus and rail may turn out to be the best option for many people going forward.

We think dealing with the rest of the NY-33 and NY-198 expressway infrastructure (to the I-190 and to the airport) presents challenges that are even more daunting than restoring Humboldt Parkway itself.

What should be done with the leftover stretch between Oak St and Humboldt Parkway? This hulking, massive concrete structure is as big as the Humboldt Parkway depressed section. If Humboldt Parkway is restored, this huge thing must be deconstructed. But what should take its place? The City street grid was smashed to smithereens by the expressway. Who should get to say what happens going forward?

We are reminded of the nursery rhyme: "All the king's horses and all the king's men couldn't put Humpty Dumpty together again." This part of the city was destroyed by the expressway as if a bomb had gone off. Where do we even begin the process of deciding what to do? How do we ensure that 70 years from now our successors won't look back at what we did and shake their heads in bewilderment, as we are doing now with our predecessors?



Moving Forward

Community Engagement

NYSDOT and community groups face the reality that not many people have time to focus on infrastructure projects. It seems there are always some attention-seeking critics, some community groups and activists, and a huge percentage people who don't care enough to even learn about the project.

CRT hopes that those who are already involved don't give up seeking to educate and involve more people in the EIS process. It does seem most people use GPS to navigate and that's all they need.

Studies

CRT thinks performing certain studies will bolster the argument in favor of removing NY-198 and NY-33 expressway infrastructure. CRT does not have funds to finance such studies. If NYSDOT can include these studies in the QCF project budget, we would be pleased:

1. Health Effects Study

Predicting health outcomes for residents on Humboldt Parkway and the immediate vicinity based on scenarios comparing existing conditions with restoration of Humboldt Parkway to Bidwell Parkway conditions would be useful for the QCF project.

2. Economic Effects Study

Predicting economic scenarios for comparing existing conditions against restoration of Humboldt Parkway to Bidwell Parkway conditions. Factors to study include property values, tax base, and arterial roadway business opportunities.

3. Cultural Landscape Study

Comparing cultural factors such as access to health care and education before and after restoration of Humboldt Parkway to Bidwell Parkway conditions.

Conclusion

Regardless of the outcome of current litigation, CRT believes that all parties involved genuinely want the best possible outcome for the City of Buffalo. We have concluded that deconstruction and reformulation to Olmsted's vision of a City in a Park for NY-198 and NY-33 is the best way forward. CRT stands ready to work with and provide expertise and support for all government and civic groups involved in QCF.

Let's not miss this opportunity to follow the NYSDOT 2050 Transportation Master Plan, which calls for downsizing urban highways. The public wants it, and Budgets are in place.