

# Fargo Estate Neighborhood Association

*Bounded by Porter, West, Pennsylvania & Prospect ~ Including Fargo & Jersey Streets*

c/o ~ Eighty One Fargo Avenue ~ Buffalo, New York 14201-1139

William G. Fargo (1818~1881)

Mayor of Buffalo During The Civil War (1862~1866)

Co-Founder of the Pony Express - Wells Fargo & Co. & American Express Co.

Charter Member of Prospect Hill Neighborhood Alliance

*Neighborhood Homes Designated Historically Significant by Buffalo Preservation Board*

---



July 11, 2013

New York Gateway Connections Improvement Project  
to the U.S. Peace Bridge Plaza  
New York State Department of Transportation – Design Office  
100 Seneca Street  
Buffalo, New York 14203

Jonathan D. McDade  
Division Administrator, New York Division  
U.S. Federal Highway Administration  
Leo O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207

Darrell F. Kaminski  
Regional Director, Region 5  
New York State Department of Transportation  
100 Seneca Street  
Buffalo, NY 14203

Re: Prospect Hill Neighborhood Alliance Consensus Comments for the Scoping Phase of the New York Gateway  
Connections Improvement Project to the U.S. Peace Bridge Plaza

Dear NY Gateway Connections Improvement Project Officials:

This letter documents the consensus opinion of Prospect Hill Neighborhood Alliance, a coalition of individuals and community groups representing over 7,000 residents of Buffalo's West Side community. Our member organizations include the Fargo Estate Neighborhood Association, Cottage District Association, Armory Hill Association, Columbus Park Neighborhood Association, Niagara/Rhode Island Community Association, Kleinhans Neighborhood and the Buffalo West Side Environmental Defense Fund. The enclosed comments express the concerns of these groups individually and collectively.

We believe that insufficient attention has been given to the ongoing and future adverse human health and quality of life impacts of commercial truck traffic generated by the Peace Bridge. For this environmental review process, the New York State Department of Transportation (NYSDOT) and U.S. Federal Highway Administration (FHWA) have already stated they will be using existing conditions as the baseline for future modeling of air quality issues, as if existing conditions are acceptable. In truth, however, existing conditions are the cause of the toxic air pollution that blankets our community and has caused widespread illness. And regardless of how this modeling is completed, this ramp project cannot and will not reduce air toxins to acceptable levels. On this issue and others, the actions of NYSDOT and FHWA have already indicated that you don't understand our community or the multitude of health issues we face each day as a consequence of commercial truck traffic crossing the Peace Bridge.

For over a decade, West Side residents have made it clear that they do not want the NYSDOT, FHWA, or the Buffalo and Fort Erie Public Bridge Authority (PBA) to dictate what our community needs, especially when it will adversely impact public health, historic resources, and the environment. The NYSDOT's position that redesigning entrance and exit ramps for the U.S. Peace Bridge Plaza will help streamline traffic flow and relieve traffic congestion is an unproven theory and is unsupported by any documented study. These concerns were expressed in writing to FHWA in March 2011, New York State Senator Tim Kennedy in February 2013, and NYSDOT Commissioner Joan McDonald in March 2013.

In January of 2012, FHWA withdrew from a previous Peace Bridge transportation project supported by the NYSDOT for some of the very reasons NYSDOT and FHWA are now proposing in the New York Gateway Improvement Project: improvements to the Peace Bridge crossing with reconstruction, relocation, and improvements to connecting roadways. After a failed 11-year attempt to complete an Environmental Impact Statement, FHWA concluded in their “Rescinded Notice of Intent,” published in the Federal Register on January 10, 2012, that “as the project and environmental documentation developed from the original scope, as a result of the comprehensive environmental review and coordination with federal and state resource agencies, the community and resource agency concerns relating to historic impacts, relocations, and other environmental impacts were at this time becoming increasingly paramount.” FHWA went on to note that the project had “engendered controversy” since its inception 20 years prior. Not surprisingly, the controversy remains the same today as it did 18 months ago when FHWA reached their initial conclusion.

The New York Gateway Connections Improvement Project to the U.S. Peace Bridge Plaza has the potential to worsen the already deleterious air quality and noise conditions imposed on the neighborhood by the Peace Bridge. Without considering the adverse impacts of the PBA’s ongoing operations in a neighborhood, where the surrounding land use is incompatible to hosting the second busiest international border crossing between the U.S. and Canada, the NYSDOT and FHWA now seek to expand noxious use of the Peace Bridge while ignoring the community’s cries for help and the irrefutable scientific and medical analysis of the identified problem. As it stands, both the NYSDOT and FHWA should have completed a comprehensive feasibility study that carefully examined existing conditions **before** beginning this public scoping process. If a feasibility study has already been conducted, we ask that you make it available for public review before moving forward on this project; if one has not yet been developed, we request that NYSDOT and FHWA do so and make it available to the public for review well in advance of releasing the Draft Environmental Impact Statement.

The adverse public health impacts imposed on our residential community by the Peace Bridge has been extensively studied for the past decade by numerous scientific and medical researchers, including Drs. Tonny J. Oyanna, Peter Rogerson, Jamson Lwebuga-Mukasa, John Spengler, Joseph Gardella and William Scheider (all referenced in the public comment letter submitted by the Niagara Gateway Columbus Park Association).

The proposal to build more infrastructures leading to and from the U.S. Peace Bridge Plaza ignores the reasonable alternative to move commercial truck traffic off of the Peace Bridge and to another location. This is the preferred alternative that the West Side community has supported for over ten years and still supports today. Our vision to restore the health and quality of life to Buffalo’s West Side does not include altering the Peace Bridge infrastructure to accommodate more commercial traffic or expedite the processing of commercial traffic, only to draw more traffic. We have tirelessly advocated restoring the international bridge to a passenger car only crossing, which was the intended purpose when it opened in 1927.

Elimination of truck traffic at the Peace Bridge and reconfiguration of the U.S. Peace Bridge Plaza as a true gateway to the U.S., instead of a doormat, would serve the purpose of expediting passenger vehicle traffic between Buffalo and Fort Erie for sporting events, cultural events, dining, shopping, etc. This would greatly enhance the economic benefit of this crossing for Buffalo and all of Western New York. An appropriately sized and located corridor for commercial truck traffic at a different bridge crossing would also allow for possible inter-modal development and commercial spin off business. The dedicated truck crossing would benefit international trade.

Elimination of the truck traffic from the Peace Bridge along with other traffic calming measures would take care of that issue without any further construction or development or destruction of neighborhoods. It would also eliminate significant air pollution, wear and tear of local roadways, and the taking of public and private land to expand the footprint of the plaza, which already interferes with the enjoyment of the community’s resources. With the recent purchase of the Episcopal Church Home, the intent to take Busti Avenue, and support of the PBA demolition of historic homes on Busti Row last February, the State of New York has made it very clear that they will support the expansion of the U.S. Peace Bridge Plaza.

Therefore, we ask that NYSDOT and the FHWA evaluate a true solution for the community, not the PBA, who does not recognize a duty to the local community. In addition to the mandated environmental review processes, including the full scope of cumulative impacts, the DOT and FHWA should identify a transportation alternative that maximizes the economic impact to the Buffalo-Niagara Region—specifically, benefits to our service sector, tourism, retail—and allows for reasonable commercial traffic to cross at a site other than the Peace Bridge and benefit the rest of the state and nation. This must be achieved by eliminating any future adverse impacts to the health and welfare of the West Side community.

We are submitting these comments in an honest effort to assist government agencies in making determinations that will affect their communities and their constituency each of these groups represent. We hope the comments are accepted by NYSDOT and FHWA, as well as all other participating agencies, and given reasonable consideration and incorporation into this process. Finally, in addition to the comments provided above, the collective Prospect Hill Neighborhood Alliance fully supports the public comments submitted by the Niagara Gateway Columbus Park Association for the New York Gateway Connections Improvement Project to the U.S. Peace Bridge Plaza, which were submitted to Mr. Jonathan McDade, FHWA and Mr. Darrell Kaminski, NYSDOT on July 11, 2013.

Sincerely,

*James Messina*

James Messina, President

Fargo Estate Neighborhood Association

- On behalf of the Prospect Hill Neighborhood Alliance

Phone – 716.882.0016

Email – [jjm8181@aol.com](mailto:jjm8181@aol.com)