



Public Comment submission for NY Route 33 Reconnecting Humboldt Parkway

July 29, 2022

Executive Summary

Frederick Law Olmsted and Calvin Vaux got it right when they designed Buffalo's Park System. Our parks made Buffalo a city people wanted to live in. The parks spurred economic and population growth along with Buffalo's location and affinity for transportation technology. The Parks were imagined and built at a time without cars. By the 1950's, cars had overrun Humboldt Parkway, which unintentionally induced traffic from Buffalo's radial streets.

Sadly, in the 1950's and 60's planners got it wrong. They catered to cars and destroyed the parks. We think the objective today of NYSDOT to maintain traffic flow with the current project is just as wrong.

Route 33 was a potent force for making people leave Buffalo. Urban highways across the country had similar effects. Today we can look back and see how much Route 33 damaged Buffalo. As pressure from traffic mounted, we now know urban planners should have limited traffic by putting Humboldt Parkway on a road diet while keeping the beautiful parks.

CRT has attended public meetings, completed site visits, analyzed New York State Department of Transportation (NYSDOT) traffic count data, studied Region Central and offers these recommendations for NYS Route 33, aka The Kensington Expressway. We think the NYSDOT cap proposals are too expensive, provide minimal connectivity, and don't go far enough to restore the park aspect of Humboldt Parkway and does little to heal the neighboring community.

It is CRT's opinion within the Route 33 project limits as defined by NYSDOT, that Humboldt Parkway should be restored with a modern, complete street having one travel lane in each direction, parking in both directions, and a separated bike track having one lane less than 8 feet wide in each direction. The roadway footprint should be the same as it was before Route 33 replaced Humboldt Parkway having 36 feet for cars and bikes with an 84 foot-wide median with appropriate soil for full-sized trees, bushes, decorative lighting, plants, benches, and gardens.

CRT understands that our recommendation will have a significant impact on traffic. We believe Buffalo's radial streets can readily absorb most of the displaced traffic with increased bus frequency. CRT believes that offering high-speed, high-capacity Light Rail Rapid Transit on publicly owned rights of way will provide a small-footprint, zero emissions, and an effective alternative for those suburbanites who want a fast commute downtown and to East Side locations.

Introduction

Citizens For Regional Transit (CRT) is a not-for profit organization whose purpose is to advocate for better and more sustainable public transportation and policy. We do this by communicating the benefits of transit through facilitating public conversation and participation, advocacy of better and equitable transportation and climate policy via educational events, information sharing, constructive feedback, and other outreach efforts.

CRT understands the NYSDOT logic of treating current NY Routes 33 and 198 transportation corridors as independent, but we think doing so is unwise. As our name suggests, we think it is important to view transit policy and solutions from a regional, integrated perspective.

Project scope

CRT recommends that the scope of GBNRTC Route 198 Region Central be expanded to cover Route 33 between Downtown's Elm/Oak arterial and the interchange for Routes 198 and 33. Planning work should include cell phone data from data provider Streetlight for analysis of Route 33 from Bailey Ave to Oak Street in order to predict traffic run-off onto Jefferson, Fillmore, and Bailey Avenues as well as crossroad arterials: East Delavan, East Ferry, Genesee, Walden/Best, Sycamore, and Broadway. Restore Our Community Coalition's website speaks to returning traffic to the Jefferson and Fillmore business districts.

CRT recommends that Route 33 project scope be expanded to include and be incorporated with Region Central. At a minimum, it should follow the principles established by Olmsted's vision and plan.

History

Thanks to Frederick Law Olmsted and Calvin Vaux, Buffalo was famous world-wide for the "city within a park" concept, along with the Ellicott radial street layout patterned after Paris, France. Humboldt Parkway was cited by some as the most beautiful street in the world from the late 1800's to the mid-1900's.

It had been less than 100 years since President Lincoln signed the Emancipation Proclamation freeing slaves when Humboldt Parkway was constructed. It was before suburbs and malls existed. There was no Amazon, but there was Buffalo's Larkin company. Jobs, shopping, food, and entertainment were still primarily in downtown Buffalo. When the Humboldt Parkway was built, there were no cars.

By the late 1950's Buffalo's first ring suburbs had taken on a life of their own. Upwardly mobile mostly White folks were enticed by modern single-family homes having fenced yards, modern forced-air furnaces, detached garages as compared to old wooden homes with multiple apartments, thin walls, coal gravity furnaces, and less than airtight doors and windows. Fast, easy access to downtown was critical for the early success of suburbs. Eventually, shopping and jobs migrated to suburbia, but Downtown continues to attract as many commuters to the city as those who live within the city limits.

Plans for Route 33 in the current NYSDOT project scope were announced in 1946 at a time when automobiles had supplanted streetcars and horse-drawn buggies. Cars dominated. Projections were being made that Buffalo's population would soon exceed 1 million. Money

designated for interstate highways was flowing instead to urban highway projects. While there was opposition to urban highways, the push to promote suburban middle-class lifestyles was all-consuming.

Delaware Park and Humboldt Parkway were sacrificed to provide capacity for cars. The beauty of Olmsted's vision was erased. In hindsight, the cost of losing these treasures exceeded the benefit of providing fast access for commuters. When CRT examined maps of pre-Route 33 Humboldt Parkway, we were shocked by how much housing, businesses, parks, and amenities were lost for the sake of Routes 198 and 33 in the defined project area as well as Buffalo's Fruit Belt. It is astonishing that anyone ever thought these urban highways could possibly be a good idea.

By the 1960's, Humboldt Parkway had become a daily 6-lane free-for-all during rush hours. Known as the "hourglass," Humboldt Parkway had a reputation of being detested by motorists due to traffic congestion.



Figure 1 Pre-construction map of the original Humboldt Parkway

Plans were made. Overwhelming community opposition was ignored. Construction commenced and Buffalo was saddled with Routes 198 and 33 as presently configured.

Figure 1 (pre-construction map) shows the historical reason why Routes 198 and 33 should not be considered separately. In combination, they replaced Humboldt Parkway. They are locked together by a complex interchange.

The purpose of Humboldt Parkway was to connect what is now named Martin Luther King Park with Delaware Park while providing city residents with a peaceful, leisurely park setting within their neighborhood. The parkway was to extend south on Fillmore Avenue to Seneca Street. The importance of the park setting was ignored when Routes 33 and 198 were planned. The character and alignment of Humboldt Parkway were radically changed. The parkway was destroyed.

Route 198 planning has been turned over to the Greater Buffalo Niagara Regional Transportation Council (GBNRTC) as the Region Central project. Route 33 planning is being conducted by NYSDOT. While NYSDOT is a member of GBNRTC, NYSDOT is not availing themselves of the many analysis capabilities of GBNRTC. CRT thinks NYSDOT should turn their Route 33 planning over to GBNRTC to examine the entire corridor cohesively.

Following the obliteration of Humboldt Parkway and highway intrusion into Delaware Park, Buffalo went into a steady decline. CRT considers the destruction of the beauty of the city a key factor in Buffalo's decline. Formerly beautiful neighborhoods and parks were devastated by the scars that are Routes 198 and 33. The housing stock and park surroundings were among the finest in the USA. It was ruined by these urban highways and Redlining. A deadly, ugly, noisy, stinking, polluting trench forced many people to leave. Those who stayed saw their property values fall and their health deteriorate.

Route 33 is Dangerous

One does not need to search far for evidence of the dangers of Rt 33. From last week's Buffalo News:

*Motorcyclist, 21, dies after crash that closed inbound Route 33
By Dale Anderson, July 16, 2022*

A motorcyclist who struck a guardrail, causing the inbound Route 33 (Kensington Expressway) to shut down for nearly three hours Saturday, has died in Erie County Medical Center, a Buffalo Police Department spokesman said Sunday.

Spokesman Michael J. DeGeorge said the 21-year-old Buffalo man was westbound when he struck the guardrail just after 5:30 p.m. near the Best Street exit ramp. He was taken by ambulance to ECMC.

It is telling that this news story focuses on the fact that traffic was shut down and makes no mention of the consequences of the man's death other than affecting traffic flow.

Lately, residents have been spontaneously shutting Route 33 down. Here's an example from 7/24/22 Buffalo News, about the above recent death:



Figure 2 Buffalo News story about expressway death

Who uses Route 33 and why?

Downtown Core

Rt 33 connecting the Downtown Elm/Oak arterial and Humboldt Parkway should be considered the same transportation corridor as the NYSDOT project area, as they are connected and flow together.

Starting at I-190, the Elm/Oak arterial acts as an on and off ramp for I-190 distributing and collecting traffic to and from the downtown core.

Route 33 feeds traffic to and distributes traffic from I-190 to the west and I-90 to the east.

Route 33 brings commuter traffic from northern and eastern city neighborhoods and suburbs to and from the downtown core.

Heavy commercial and local delivery truck traffic, while a relatively small component, is important, nonetheless.

Fruit Belt

CRT is pleased with the methodology being used by the GBNRTC to analyze Route 198 and Region Central. There is data explaining how people use Route 198 and move within Region Central and how the highway acts as a barrier.

Because CRT has no Streetlight data for Route 33, CRT makes its recommendations building upon and making inferences from Region Central data. We know approximately 30% of Buffalo households are car-free (do not own cars), and that the percentage increases in inner-city neighborhoods including the Fruit Belt through which Route 33 traverses. We think these household residents are more likely to walk, and probably have fewer cell phones per household than wealthier areas such as Region Central. We note that should Streetlight data become available, it must be adjusted for lower cell phone penetration to be accurate.

Region Central suggests that almost 40% of Route 198 area trips taken are walking. Given the higher concentration of car-free households in the NYSDOT project area and the Fruit Belt, we think in these areas more than 50% of all trips are by walking. CRT expects about 30% of the remaining trips are taken by automobile. CRT estimates about 20% of trips in the corridor are taken using public transportation, bicycle, and other modes. In other words, for the most part, Route 33 is mostly useless to these residents. CRT believes truck traffic involving the Fruit Belt is primarily local delivery. Most truck traffic on Route 33 merely passes through the Fruit Belt.

Humboldt Parkway

CRT estimates about 15 to 20% of traffic on Route 33 involves trips to and from streets in the Humboldt Parkway neighborhood. Again, we wish Streetlight cell phone data would become available to help with analysis.

Grider Street to I-90

This segment of Route 33 primarily serves as an on/off ramp for Interstate 90. Secondly, this segment provides intracity connections to adjoining neighborhoods while also acting as speedy corridor for suburban commuters.

I-90 to Genesee Street

The easternmost segment connects the Buffalo Niagara International Airport with I-90. It is an on and off-ramp for I-90. Route 33 collects and distributes traffic to and from eastern suburbs with traffic connecting with Genesee Street.

NFTA

CRT notes that the NFTA uses Routes 198 and 33 as important corridors for buses entering into and returning from service in eastern locations, although alternative routes are also available for this purpose.

End to End traffic

Streetlight cell phone data would be especially helpful providing this metric, but it is not available to CRT. In Region Central, a surprisingly small percentage of traffic goes end-to-end on Route 198.

NYSDOT traffic count data indicates more than 98,000 cars travel on Rt 33 at Harlem Road. (See Figure 2) At Grider Street, the count is more than 111,600.

At the Downtown end of Route 33 the count is only 57,500, which tells us nearly half of Route 33 traffic is exchanged with Route 198 traffic at the Route 198/33 interchange. CRT estimates a traffic count only about 30,000 (representing 15,000 people each way) for traffic traveling the entire length of Route 33 between the Airport and Downtown. NSYDOT traffic counts are weekday counts on a typical day. (See Figure 3)

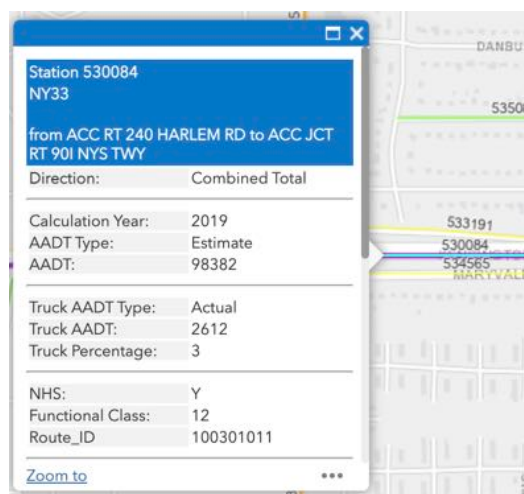


Figure 3 NYSDOT traffic count for Route 33 near Harlem Rd

All traffic counts are sourced from the NYS Traffic Data Viewer using 2019 data.

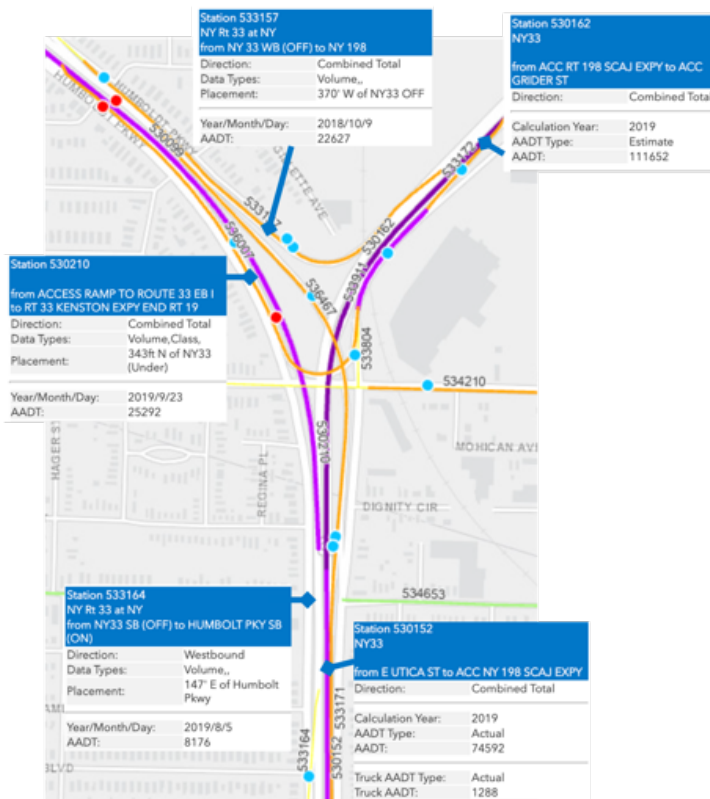


Figure 4 Routes 198 and 33 interchange

NFTA Metro Rail carries almost 20,000 people per week day in an alignment that is roughly parallel to most of Route 33 between Route 198 and Downtown. This number will increase when the Metro Rail Amherst extension is completed and increase even more if the Tonawanda branch is completed. Elmwood Ave and Delaware Ave carry about 25,000 cars each. Main Street near Route 198 carries about 20,000 cars.

Other parallel streets include Sycamore (3,500), Genesee St (6,000), and Broadway (8,000). CRT believes these arteries are very underutilized because of demand induced to Route 33. CRT finds it noteworthy that NYSDOT traffic counts do not add up. In order to make judgements, CRT board members performed a site visit to get a better idea of how traffic is flowing in the corridor.

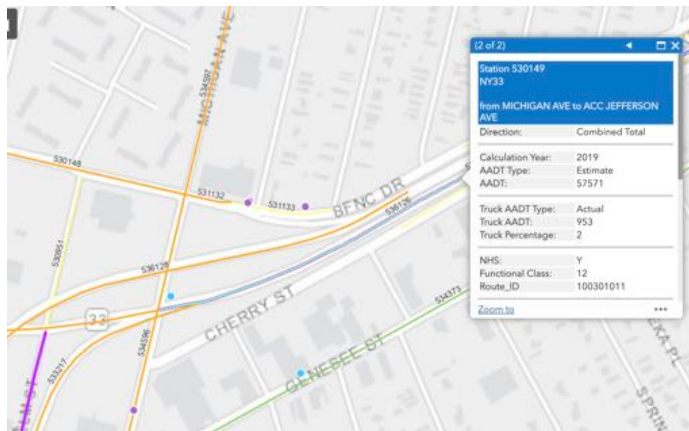


Figure 5 NYSDOT Downtown End of Rt 33 traffic count

Considerations

CRT recommendations consider the following factors:

Safety: What is the safety record of the infrastructure as currently configured? What can be done to improve safety?

Complete Streets: What improvements can be made to accommodate transit, pedestrian, bike, eBike, and other forms of traffic?

Preservation: What infrastructure ought to be kept for the sake of history?

History: CRT recognizes that the bucolic park scenes designed by Olmsted and Vaux were made at a time when there were no automobiles. Street cars were the order of the day when it came to transportation other than horses, walking and bikes. We recognize that automobiles must now be accounted for.

Beautification and access to parks: CRT espouses the aspirations of Frederick Law Olmsted and Calvin Vaux and eschews Robert Moses and his followers.

"If your downtown isn't photogenic, don't bother trying to sell it." – Design Block, Fritz Abell

Level of Service: CRT believes that counting people far outweighs the value of counting cars. The service is moving people, not cars.

Environmental impact: Environmental factors are integrated into the CRT decision making process. CRT believes corridor improvements should reduce noise and pollution resulting in a more healthful environment.

Neighborhood character: CRT believes improvements must take into consideration the character of each neighborhood through which the corridor passes.

Costs: CRT considers total lifecycle costs including upstream, downstream, and operational costs. Taxpayer money should not be wasted. Costs are intrinsically tied to environmental impacts. Costs of various infrastructure types such as bus, LRRT, and car must be compared with each other.

Community Groups: CRT considers the positions of Restore Our Community Coalition, Hamlin Park, Parkside Association, FruitBelt Coalition and the Olmsted Conservancy.

Speed: Speed is the enemy of safety. Nevertheless, speed is prized and is an important factor. CRT seeks to maximize both safety and speed by proposing safe transportation on high-speed, high-capacity frequent East Side LRRT as a viable transportation alternative.

Analysis and Recommendations

Region Forward tells us Route 198 acts as an on/off-ramp for Route 33. It takes cars from Elmwood Ave, Delaware Ave, and Parkside Ave and channels them to and from Route 33.

Route 33 acts as a shortcut between Downtown Buffalo and points both north and east within the city, as well as for Amherst, Cheektowaga and eastern suburbs. Route 33 induces traffic from the Parkside, Kensington, and University neighborhoods siphoning traffic from Main Street, Jefferson Ave, Michigan Ave, Genesee Street and many other local roads.

CRT understands that decreasing capacity on Route 33 between Downtown and Route 198 means that other corridors will face increases. CRT proposes to add a new high speed LRRT East Side corridor that would be able to easily handle 40,000 to 60,000 boardings per day.

CRT also understands that many travelers have become accustomed to driving and expect to be able to get to and from downtown quickly, regardless of where they live. Doing anything that takes away this entitlement is likely to cause opposition. The entitlement comes at the expense of those living on Buffalo's East Side. Our proposal for a new high speed East Side LRRT corridor addresses this concern.

CRT does not romanticize returning to bucolic pre-car days, but would like to propose returning Route 33 to pre-expressway condition and proposes improvements between Downtown and the Route 198 interchange.

Downtown connection and Fruit Belt

Homes and businesses on the north side of Cherry Street were destroyed to provide up to 12 lanes of highway through the Fruit Belt. Homeowners and businesses were displaced. There is something that ought to be criminal about the way this highway was designed. We should correct the past mistakes now.

CRT's recommendation is to reconstruct Route 33 between Northampton Street and Northland Avenue as a complete street at grade resembling the new Niagara Street, having one 30-mph travel lane in each direction, parking on one side in both directions, and a single lane for a cycle track in each direction. The cycle track must be narrow enough that cars can not drive or park on it. There will be ample sidewalks and walkways. All bridges in the NYSDOT project area will be removed and cross streets restored.

CRT recommends the removal of all expressway elements between Northampton Street and downtown. CRT recommends the restoration of Cherry Street as a complete street zoned for business, light-industrial, mixed-use, and residential. CRT recommends the restoration of Cherry Street connection with Elm Street. CRT recommends that local street connections with Cherry Street and crossing the removed highway be restored between Michigan Ave and Northampton.

CRT expects most traffic from the Elm/Oak arterial will disperse to radial streets instead of using Route 33.

CRT proposes high-speed, high-capacity East Side Light Rail Rapid Transit (LRRT) be offered to supplement cars.

Far safer, quieter, more environmentally friendly, and less expensive than highways and cars, East Side LRRT would allow commutes from Transit Road to Downtown to be accomplished in

minimum time. The LRRT right-of-way is already publicly owned, which reduces acquisition costs. The East Side LRRT corridor is part of the original plan for Buffalo's Metro Rail system.

It is important understand that CRT does not advocate using Route 33 Humboldt Parkway as an alignment for East Side LRRT Metro rail service. Our proposal is for an alignment that is more southern and direct to the Airport.

See Figure 5



Figure 5 CRT East Side LRRT proposed alignment

Routes 198 and 33 Interchange

This complex interchange handles a lot of traffic. It is complicated by CSX railroad tracks that cross through the middle of the interchange. CRT has heard proposals to turn the interchange into a traffic circle, but we cannot envisage such a circle without tearing down more homes and businesses. We think it is best to keep this interchange as-is except for new striping to accommodate the reduction of capacity for Routes 198 and 33.

CRT recommends the same complete street treatment we suggested for Humboldt Parkway for Route 198 between Loring Avenue and Main Street.

Routes 198 and 33 Interchange east to the Airport

At public scoping meetings, CRT heard residents ask that a Humboldt Parkway-like restoration continue all the way from the Route 198 interchange to the Airport. CRT does not think that replacing or downsizing Route 33 between Route 198 and the Airport with a complete street is currently feasible. We would like to see how the public reacts to the complete street proposals we have put on the table before tackling the corridor east of Route 198. CRT's East Side LRRT

proposal should reduce demand for handling the 111,000+ cars on Route 33 east of Route 198. For now, we recommend Route 33 between Route 198 and the Airport remain as-is.



Figure 6 Recommendations for Route 198/33 interchange

Conclusion

Today we have an opportunity to do it right this time using twenty-first century priorities, which include addressing climate change, complete streets philosophy, and truly multi-modal transportation solutions. Instead of spending \$1 billion to do it the wrong way again, let's do it right this time. Let's restore Humboldt Parkway and supplement Buffalo's roads and streets with viable, high-speed, high-capacity East Side LRRT on its own alignment, not on Humboldt Parkway. Let's restore Humboldt Parkway to a modern version of the vision of Olmsted and Vaux while healing the community.