Appendix M-6
Letters A through R

Part 7

July 2021 DEIS Public Comment

Bob Haley <rhaleyarch@gmail.com>

Thu 10/14/2021 5:13 PM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>

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Sending the AIA CNY I-81 Task Force review if the 2021 DEIS.
Detailed reply comments to follow
Thank you,

ROBERT HALEY ARCHITECT AIA LEED AP
Sustainable Planning, Architecture & Urban Design
137 Buckingham Ave., Syracuse, New York 13210
rhaleyArch@gmail.com cell 315-679-1009

AIA Central New York

A Chapter of The American Institute of Architects

October 13, 2021

Mr. Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Mr. Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

RE: AIA CNY I-81 Task Force - July 2021 DEIS / I-81 Viaduct Project

Dear Mr. Frechette and Mr. Marquis:

This project is critical to the future of Syracuse. It has and will effect the lives of those who live, work and visit this city and region. The many unexpected delays in this project have actually benefited the process by helping more people to understand the complexity of rebuilding a major regional infrastructure through the center of a vibrant city. And the people are speaking.

After these 8 years of advisory participation in the NYSDOT "I-81 Viaduct Project" for Syracuse and CNY, we affirm and support the "Community Grid option" as the preferred plan for the future of the City and region. This position has firm and growing public support.

At this stage of the DEIS, we see the "Community Grid option" as meeting the repair and improvement goals of project. The plan has two basic components. The 90% of the regional traffic service seems to be met to the current highway engineering standards for regional and commuting service. The 10% of the project within the city, however, is yet deficient in providing for pedestrian and traffic safety, and for the future of the economic and environmental quality of life of it's growing and diverse community. The project area within the city, this 10% of the project, will impact the daily lives and growth of generations to come, and is not yet being supporting by DOT design decisions supporting these critical neighborhoods. Our comments here request specific design improvements still needing attention in these areas, before the final EIS & ROD is approved.

Thank you and your entire design team for your ongoing support to our requests.

Sincerely,

AIA CNY I-81 Task Force
Robert M Haley Jr AIA / Chair / Tel: 315-679-1009 / Email:rhaleyarch@gmail.com

cc: Syrcause Mayor Ben Walsh
Onondaga County Executive. Ryan McMahon
NYS Governor Kathy Houhul
Senator Kirsten Gillibrand
Senator Chuck Schumer
Secretary Pete Buttigieg
President Joe Biden

AIA CNY Task Force contributors 2013-2021
Dean Biancavilla, AIA, Urban Design Center
David Ashley, AIAArchitect
Andrew Schuster, AIA
Jason Evans, AIA
Tom Kinslow, AIA
Anthony Casamadirties, AIA
Bob Crysler
Mike Stanton

July 2021 DEIS / AIA CNY I-81 Task Force Review / Issues To Be Address
(detailed list to be further defined)

A. Land & Land Use
1. Identify and reduce the 1960's ROW to a minimum.
2. ReZone coordination for economic development, plan for increased density
3. assign land use / not vast, unmaintained landscapes, open green in renderings
4. Almond St. width limit, Dave A, Tom's hands
5. reduced land & landscaping "now" will save both initial and long tern maintenance costs.

No federal, State or local tax dollars should be destined for long term maintenance of the open & unassigned, unused DOT ROW land, when it could be better used and self maintained if returned to city tax base now. Reduce the Almond St. ROW to a maximum of 110'-120' in width. This is a typical "main street" for mixed-use development as called for in ReZone Syracuse planning.

B. Neighborhood Economic Development
1. designate redevelopment project areas by neighborhood need

C. Safety
1. Pedestrian & traffic safety
2. "BL-81" and Qualified Highway design impact for safety
3. MLK area & roundabouts
4. Pedestrian quality on & under highways, pedestrian weather barriers
5. speed limits, safety, sound & pollution reduction

D. Reduce all Costs
1. Reduce the amount of land in the project area to a minimum
2. Return excess lane for tax based development.
3. Omit large areas of open landscaping, lawns, trees, excessive wide sidewalks and traffic medians from the project area. Return to adjacent property owners for future use, productivity and maintenance

E. Southside Community Reconnect

1. Full Southside access points on BL south, at Kennedy, Colvin & Brighton
2. Reduce sped limit to 30-45mph for the BL south neighborhood area,
3. Reduces speed will reduce noise and project cost or Intrusive sound barriers.

F. Continuing Public & NEPA Engagemant

1. Oakwood Cemetary access
2. support for DeWitt Exit 3 improvements
3. need for immediate regional transit plan, BRT, city & county
4. support for improved roadways, elimination of West St. I-690 ramps and construction
5. Public engagement for full construction phases
6. Support for public health & mobility needs through full construction phases
7. Ongoing planning & construction phasing meetings w/ local neighborhoods

G. Design Improvements

1. Pedestrian & traffic safety
2. Pedestrian environment & weather protection

RECEIVED
OCT - 7 2021
BY:

Mark Frechette, PE

Of course I use 81 and have no problem navigating it the way it is. While some improvements would be helpful - especially To the hospitals on The hill - congestion is rarely a problem. Secondary routes are also handy. Properly maintaining what we have and adding decorative updates makes more sense.

PS. It is very rare To have input by The "people" on any issue so thank you

David Allen

David Alber
5083 Clifton Dr.
Syracuse, NY 13212

Mark Frechette PE
NYS DOT Region 3
333 East Washington St.
Syracuse, N.Y.
13202

SYRACUSE NY 130
4 OCT 2021 PM 3 L

Comments from Alliance for a Green Economy

Jessica Azulay <jessica@allianceforagreeneconomy.org>

Thu 10/14/2021 4:39 PM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>

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Please find attached comments from Alliance for a Green Economy on the I-81 Viaduct Project Draft Design Report (DDR)/Draft Environmental Impact Statement (DEIS).

Sincerely,
Jessica Azulay

_____

Jessica Azulay (she/her or they/them)
Executive Director
Alliance for a Green Economy
315-480-1515 (no texts)
jessica@agreenewyork.org

AGREE New York
Alliance for a Green Economy
www.agreenewyork.org

Donate here to support the ongoing work of Alliance for a Green Economy

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Syracuse, NY 13210
www.agreenewyork.org

October 14, 2021

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

RE: Comments on the I-81 Viaduct Project Draft Design Report (DDR)/Draft Environmental Impact Statement (DEIS)

Dear Mr. Marquis:

Alliance for a Green Economy is a Syracuse-based organization working for safe, affordable energy and the development of a green economy in New York State. Please accept these comments on the I-81 Viaduct Project Draft Design Report (DDR)/Draft Environmental Impact Statement (DEIS).

Transportation decisions, like the I-81 redesign process, have long-lasting impacts on the health, quality of living conditions, mobility options, and environment for the communities that transportation projects pass through and potentially serve. More than 50 years ago, Interstate 81 ripped through a working-class Black neighborhood in Syracuse. This decision resulted in the displacement of long-time residents, and has contributed to the legacy of poverty, pollution, and a lack of resources for those who live in the highway's shadow.

Construction of I-81 also took land from the Onondaga Nation, dividing their territory and community and perpetuating a shameful history of land theft from Indigenous Peoples by the U.S. Government.

From an environmental and health perspective, as it stands today, I-81 contributes to a landscape built around racial discrimination, prioritization of private vehicles, and sprawl, and represents a corridor of greenhouse gas emissions, air pollution, and the transportation of radioactive waste from US and Canadian nuclear facilities.

We agree with the New York State Department of Transportation's current preferred option to remove the 1.4 mile stretch of the viaduct and replace it with a street-level grid. Removing the viaduct is a great first step toward racial justice and toward smarter planning. However, we need to continue to advocate for environmental, racial, and economic justice to ensure the fair and equitable treatment of community members who live along I-81. The NYSDOT also needs to

honor the requests of the Onondaga Nation, ensuring free, prior, and informed consent for this project located on their lands.

Respect the Rights and Requests of the Onondaga Nation
In 1794, the U.S. Federal Government made a treaty with the Six Nations, including the Onondaga Nation, known as the Treaty of Canandaigua. In this treaty, which is still in effect today, the U.S. Federal Government affirmed the Onondaga Nation's exclusive right to a nine-mile square area south of Onondaga Lake and their continued rights to fish, hunt, gather, and engage in other traditional uses throughout their entire indigenous territory. The vast majority of the I-81 project area falls within the exclusive treaty- protected territory and the remainder lies within the Nation's traditional indigenous territory.

State and federal agencies must fully consult with the Onondaga Nation and honor their requests with regard to the I-81 project. The Phase 1A and 1B Archeological Reports recognize that the potential exists in this project for the disturbance of Haudenosaunee archeological sites. The Onondaga Nation repeatedly requested in the official correspondence included in this EIS that proper respect and protocols be used to ensure that ancestral remains are not disturbed in the construction of the project. We ask that the Federal Highway Administration, New York State Department of Transportation and the State Historic Preservation Office fully adopt the recommendations of the Onondaga Nation, including but not limited to:

- Hiring multiple Cultural Resource Monitors from and trained by the Onondaga Nation to be present at all ground disturbing activities
- Using the proper terms to refer to the Onondaga Nation, its territory, and its people.
- To stop work and notify the Onondaga Nation promptly upon the discovery of any human remains. This practice ensures that, if the remains are Haudenosaunee, proper protocols are followed throughout the investigation process.

Air Emissions, Climate Resiliency, and Nuclear Waste Transport
The final EIS and I-81 project must address air pollution and greenhouse gas emissions and should be designed to accommodate lower-emissions and no-emissions transportation options such as walking, biking, public transportation, and electric vehicles of every kind. The project should also be designed to encourage planning that emphasizes walkable communities and reduces the need for personal vehicles. Transportation contributes to over one-third of New York’s greenhouse gas emissions and emissions from the transportation sector also contribute to many air quality and health harms. As a state agency, the NYSDOT is required by Section 7 of the Climate Leadership and Community Protection Act to ensure that its decisions align with the emissions limits set by the CLCPA and *shall not* disproportionately harm disadvantaged communities.

We appreciate the thought the NYSDOT has put into protecting local water quality in the design of all alternatives and support the practice of wherever possible, preserving and expanding green spaces, permeable surfaces, trees, pollinator plants, community garden spaces, and rain gardens to prevent flooding, reduce the urban heat island effect, and improve the public health and wellness of impacted communities.

The EIS must also address the current and potential shipments of highly radioactive nuclear waste from U.S. and Canadian nuclear facilities. These kinds of shipments could have major health and safety impacts on our region. The DOT should strive to design the I-81 project in ways that avoid the transportation of nuclear waste through our region or that, at the very least,

mitigate the potential impacts of transporting this waste. Most importantly, the Onondaga Nation and other communities must be consulted about any proposed shipments through their lands.

Heal Historic Harm
We also write in full support of the comments submitted by the New York Civil Liberties Union, summarized below, noting that the permanent removal of the viaduct could improve housing conditions, health outcomes, and economic and educational opportunities for all people in Syracuse. In order to do that, the NYSDOT should consider the following recommendations in its Environmental Impact Statement which will guide the construction project moving forward:

Protect Land Use
- A land transfer policy must be put in place before returning the land to the City of Syracuse that restores and enhances communities impacted by I-81, specifically the predominately Black community adjacent to the viaduct.
- Create a land trust for the eight acres directly east of Martin Luther King Boulevard East for development by residents connected to the community.
- Accommodate residents who would like to relocate with an automatic right to return.

Protect Health and Wealth
- Conduct a cumulative exposure analysis for residents who live in the communities within 600 feet of the viaduct that includes a lead, noise, and air analysis and abatement.
- Conduct a community health needs assessment.
- Do not use Wilson Park as a staging site for construction or construction materials.
- Create a Community Restoration Fund.
- Offer market-rate buyouts, rent subsidies, and/or temporary relocation assistance for people who want to move.
- Conduct an easement reassessment so that renters receive easement payments.

Access to Opportunity
- Jobs generated by the project must go to the people who live directly adjacent to the viaduct and 30 percent of them should go to Black and Brown Syracuse residents.
- Apply for the federal “SEP 14” local hiring pilot program, and limit the hiring requirements to Syracuse residents. The SEP 14 application must be accompanied by a community workforce agreement to legally require that unions hire local Syracuse residents, with a preference for impacted Syracuse neighborhoods. The DOT must also provide independent oversight to ensure the goals of the labor agreement are met.
- Expand roads starting east of MLK Blvd. to the street grid and east side of Syracuse.
- Provide governmental oversight on all aspects of this project until it is complete.

Protect School Children
- Create a comprehensive construction plan in collaboration with parents, faculty, and staff at the Syracuse City School District.
- Move the proposed highway access ramp so it is at least 600 feet from STEAM at Dr. King Elementary School.
- Conduct a study to determine if the community grid will remain a major roadway, as defined by 30,000 cars or more daily.

We appreciate the opportunity to comment on this important matter.

Sincerely,

Jessica Azulay
Executive Director
Alliance for a Green Economy

NOISE BARRIER SURVEY

I-81 Viaduct Project

PIN 3501.60

Property ID #: **390**

Benefited Property **608 Burnet Ave**

Noise Barrier ID # **Barrier 13C(P)**

RECEIVED
AUG 18 2021
BY:

Dear Property Owner/Resident,

Please check one box below indicating whether you are "In Favor" or "Not in Favor" of the proposed noise barrier in the proximity of your property/residence. One response is allowed from each property owner. For rental properties, one response from the property owner and one response from each rental unit are allowed. An absence of a response will be considered acceptance of the noise barrier.

☐ **In Favor of Noise Barrier** ☒ **Not in Favor of Noise Barrier**

SIGNATURE(S): [signature]

Not in favor of the Viaduct project!

PRINT NAME(S): Nimo Almog

DATE:

PROPERTY: ☒ Owner ☐ Renter

Contact Information (optional):

Address 312 Hawley Ave. #2

Phone 315-416-7575

Email nimomarketing@gmail.com

Survey may be submitted:

- Via email to: I81Opportunities@dot.ny.gov (attach photo or scan of completed survey)
- U.S. Postal Service via enclosed envelope

PLEASE SUBMIT THIS Survey NO LATER THAN 5:00 PM EDT September 14, 2021

I-81 Viaduct Project Team
NYS Department of Transportation
333 East Washington Street
Syracuse, New York 13202

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

U.S. Department of Transportation Federal Highway Administration

AMERICAN TRUCKING ASSOCIATIONS
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www.truckline.com

July 27, 2021

Mark Frechette, P.E.
Project Director
New York Department of Transportation
Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Ave., Suite 719
Albany, NY 12207

Dear Messrs. Frechette and Marquis:

The American Trucking Associations, the national representative of the trucking industry, requests an extension of the public comment period for the I-81 Viaduct Project Draft Environmental Impact Statement (DEIS) by an additional 90 days. Currently, the comment period expires on September 14. The DEIS was released on July 16, allowing just 60 days for community engagement and public comment. The report is more than 28,000 pages in length. Sixty days is a woefully inadequate amount of time to provide interested stakeholders with an opportunity to review this very large, highly technical document.

Additionally, we believe consideration needs to be given to expanding the in-person public hearing opportunities. Two in person sessions, held on the same day in the same location, and two virtual sessions, also on the same day, do not provide adequate opportunity for interested parties to participate in this process. The highway is a heavily traveled truck route, and motor carriers from throughout the nation will be affected by the proposed changes. It would be unfair to so severely limit the opportunity for public comment.
.
The I-81 Viaduct Project will have a significant impact on the lives of millions of New Yorkers and on trucking companies and their customers throughout the nation. The current comment period and opportunities for in-person participation are not adequate given the comprehensive nature of the DEIS and the importance of this project to the nation. Thank you for your consideration of this request.

Sincerely,

Vice President, Highway Policy
American Trucking Associations

Comments by ARISE Independent Living Center on the Draft Environmental Impact Statement for the I-81 Viaduct Project by the NYS Department of Transportation and the Federal Highway Administration

I am writing this comment in my role as the systems change advocate at ARISE, the designated Center for Independent Living (CIL) for Central New York. ARISE is dedicated to removing barriers to full community integration of people with disabilities.

In existence since 1979, we currently serve more than 8,000 people each year from our offices located in the counties of Onondaga, Oswego, Madison, and Cayuga. ARISE currently employs over 800 people and we offer over 50 programs—all of which are consumer-directed, maximizing choice and opportunity for the people we serve.

ARISE is writing today to comment on the Draft Environmental Impact Statement for the I-81 Viaduct Project that will involve converting the raised portion of Rt. 81 through the heart and length of the city of Syracuse into a ground level boulevard. This is necessary due to the Viaduct exceeding its useable life span and its threat of collapse. The ARISE main office is located at 635 James St. in Syracuse, less than 3 blocks from a raised portion of Rt. 81 that will be removed.

Full community integration of people with disabilities must include activities that ensure everyone can travel safely within their communities. ARISE has long participated in activities to make our streets, sidewalks and curb cuts more accessible and safer for pedestrians—whether they walk, roll in wheelchairs or are pushed in strollers. ARISE was one of the first agencies in Syracuse to collaborate with NY State to implement Safe Streets policies in our community and statewide.

We are also supportive of activities in the community already underway to ensure that local residents and traditionally disadvantaged workers get a chance to work on what will be the largest public works project in our city's history. According to U.S. Census data, workers with disabilities in the city of Syracuse face significantly higher rates of unemployment and poverty than workers who do not identify as disabled.

It is for these reasons that we are commenting on the Draft Environmental Impact Statement for the 1-81 Viaduct Project. We respectfully request the New York State Department of Transportation and the Federal Highway Administration to incorporate the following suggestions into its final plan for the Viaduct.

1. **Support the Community Grid model of construction.** Creating the ground-level boulevard "Community Grid" is the only practical plan to replace the current aqueduct. Other proposals such as rebuilding the current Viaduct, digging tunnels and/or creating a "hybrid" model that would incorporate a skyway over the grid are impractical on their face. The costs of the other models are prohibitive, pose insoluble engineering problems and do nothing to improving the neighborhoods that have suffered from the segregation and discrimination that the original decision to run Rt. 81 through the city of Syracuse caused in the early 1960's.
2. **Pursue inclusive hiring goals for the construction project.** A goal of helping the neighborhoods that suffered by the original siting of the Viaduct is by improving the investment in the residents of these neighborhoods. We should focus on local hiring for the construction project as a way of ameliorating the lack of investment in the housing, education and employment opportunities in these neighborhoods since the early 1960's. The project should set specific hiring goals (as a percentage of expected project work hours) on several groups of potential hires: a) local residents already trained or currently in training programs b) disadvantaged workers--e.g. disabled, formerly incarcerated, single custodial parents, public assistance recipients, workers without HS or GED diplomas, the unhoused c) create a NYSDOT managed On-The-Job training program targeted at both local residents and traditionally disadvantaged workers.
3. **The Community Grid must be designed for maximum pedestrian accessibility and safety.** ARISE would like to meet with the NYSDOT officials that will be designing the streetscape surrounding the Community Grid's ground-level boulevard. The entire boulevard must be accessible, designed with all necessary pedestrian safety equipment such as crosswalks, audible and visible crossing equipment and necessary curb cuts. NYSDOT and all relevant city agencies, such as those responsible for alternative transportation and the city's new municipal sidewalk program should join with ARISE and active pedestrians in high trafficked areas such as James St. and Townsend and E. Colvin and State/Salina to discuss needs for their neighborhoods.

Philip Prehn, Statewide System Advocate

ARISE Independent Living Center

635 James St., Syracuse, NY 13203

pprehn@ariseinc.org

315-559-1589

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Subject:	Fwd: I-81 Project DEIS Comments
Date:	Tuesday, October 12, 2021 8:18:32 AM
Attachments:	Mark Frechette Letterl.docx

More comments.

Sent from my iPhone

Begin forwarded message:

> **From:** david c ashley <davidcashley@gmail.com>
> **Date:** October 11, 2021 at 9:34:26 PM EDT
> **To:** "Frechette, Mark (DOT)" <Mark.Frechette@dot.ny.gov>
> **Cc:** Dave Ashley <davidcashley@gmail.com>
> **Subject: I-81 Project DEIS Comments**
>
> ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.
>
> Dear Mark Frechette:
>
> Kindly consider the comments in the attached letter to you regarding this project.
>
> Respectfully,
>
> David C Ashley
>
> David C Ashley, AIA
> 101 Bradford Lane
> Syracuse, NY, 13224
> 315.751-6382
> davidcashley@gmail.com<mailto:davidcashley@gmail.com>

Mark Frechette, PE
Project Manager, NYS DOT Region 3
333 East Washington Street
Syracuse, NY 13202

Oct 10, 2021

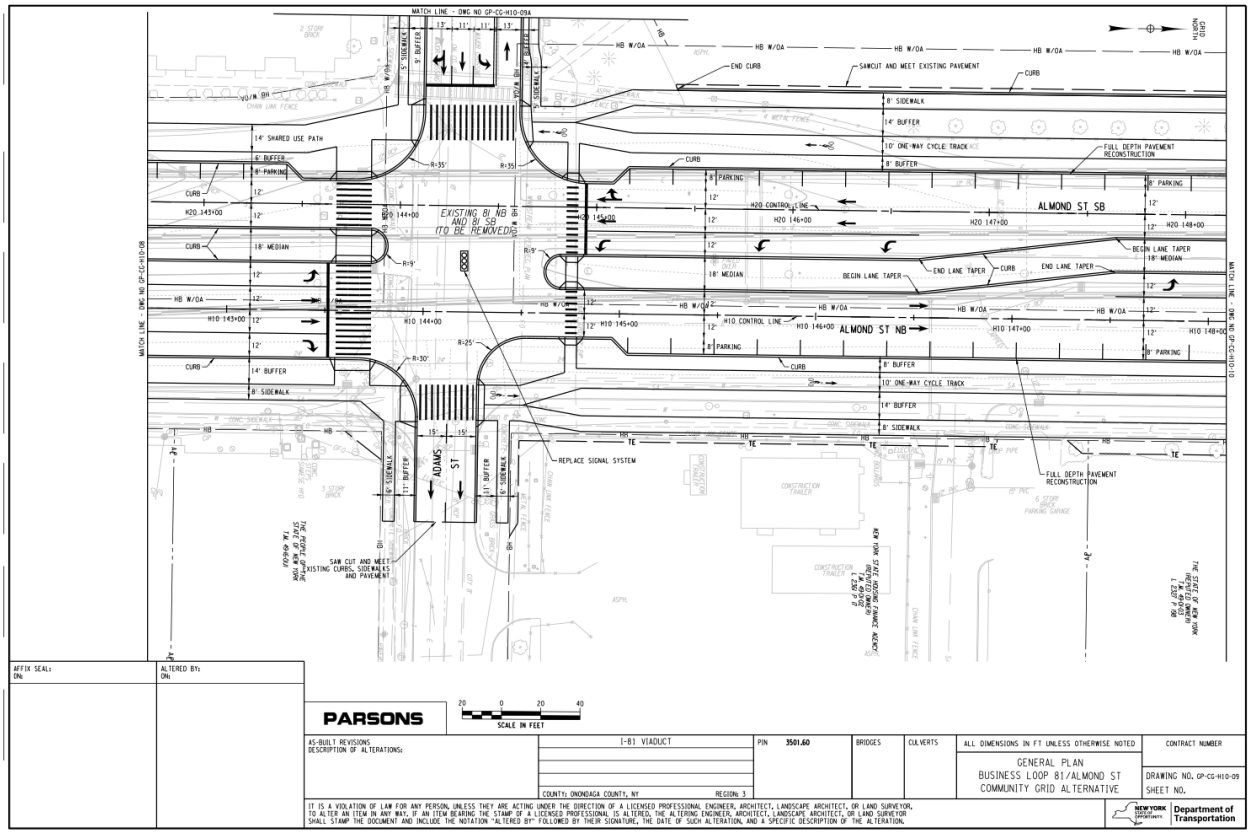
RE: DEIS Comments on Excess Property, Sharrows of Death, Path to Nowhere, Shared Paths,

Dear Mark Frechette:

NYS DOT has done a fantastic and very professional job in the I-81 Project. But there are changes, I believe, that will benefit the City of Syracuse. Kindly consider the following 10 items.

1. **Excess Property**

Below is one of DOT's drawings from the DEIS showing how they are proposing an expansive Erie Boulevard type development for the Almond Street section of the Business Loop called BL 81 running from Adams Street to Erie Boulevard.



All of this expanse is possible because the combined right of way of the old 81 viaduct and the city street, Almond Street, which has a 60 foot RoW, are both being combined to give a broad suburban type development with a new right of way of about 197 feet wide, running from

Adams Street to Erie Boulevard, far wider than the functions DOT needs to provide. There seems to be universal criticism of making this section look like the wasteful expanse of Erie Boulevard.

And, it should be noted, in the DEIS, in the acquisitions section, there is no mention of DOT acquiring or paying the city for that portion of Almond Street. Maybe it will still be just a city street and not a federal highway at the end? And who maintains it? It's unclear.

Please, *NYS DOT, consider reducing the right of way from Adams to Erie Blvd from around 197 feet that DOT is proposing, to about 112 feet leaving a strip of land on the west side 85 feet deep as described below* which will incorporate a two way protected bike lane identical to the new one on University Ave.

The dimension of 85 feet is *critical* because typically high rise apartments or office buildings are about 65 to 70 feet deep and require a minimum back yard, where there are windows, of 15 feet by state code totaling **85 feet**. The new Syracuse ReZone document allows unlimited height in this MX-5 zone allowing, say, new high rise doctor's residents for the close by hospitals, for example. Some examples of buildings 70 feet wide or less that would fit on this 85 foot wide property are:

Madison Towers 70 feet wide
Public Safety Building 67 feet wide
Hills Building 60 feet wide

The proposed dimensions for the 112 foot NYS DOT right of way construction could be as follows:

2- 15 ft sidewalks (this is typical for a downtown city sidewalk)	30 ft
1- two way bike lane (same as University Ave) 9 ft plus 3 ft barrier to traffic	12 ft
4- traffic lanes 11'-0"* wide, two each side.	44 ft
4- 1 ft gutters	4 ft
1- 8 ft parking lane on west side	8 ft
1- center landscaped median 14 ft wide or in some spots 11 ft turning lane plus 4 ft divider.	14 ft
Total	**112 feet new Almond Street (BL-81)**

Space is tight in down town Syracuse and having a temporary 85 foot wide strip of land for staging and construction parking would definitely benefit the DOT contractors during the 5 year construction period and probably save money. Not having to forever maintain a 197 foot right of way with mowing and plantings would be a benefit also to whoever is responsible. Money could also be saved by DOT and disruption reduced by this plan because the east side of Almond Street would not get torn up and rebuilt somewhere else and traffic could continue to use Almond Street during the whole construction period.

The AIA CNY Task Force has calculated that NYS DOT could declare up to 18 acres of excess property along Almond Street from Adams Street north, the triangular area across from the

Center of Excellence, some land on the north side of Erie Boulevard (when the present I-690 is removed and rebuilt to the north) plus land in the area of Pearl Street and Oswego Boulevard. Their estimate of the possible construction and taxable value of buildings on these 18 acres is $1.5 billion.

The city could set up a development corporation like Rochester and Milwaukee did to take possession of the excess DOT land, establish redevelopment goals and guidelines and sell it to developers to fulfill those goals.

NYS DOT has a formal process for disposing of "excess property" on their web site, but municipalities are entitled to acquire the property in accordance with a formal property assessment. In this case, it should be noted that the city already owns the 60 foot wide Almond Street, so if they want to purchase the 85 foot strip for resale to developers, they should only have to pay for 20 lineal feet of the 85 feet.

2.*Modify Qualified Highway Description

The DEIS includes the following statement about Qualified Highways:

> **Freight Accommodations**
>
> In addition to accommodating passenger vehicles, BL 81 would be designated as a Qualifying Highway and designed to handle buses, recreational vehicles, and trucks, including large, heavy vehicles with a width limit of 102 inches. The Qualifying Highway designation is used in New York State to depict a National Network Highway, or a highway designated as part of the federal Surface Transportation Assistance Act (STAA) of 1982 (P.L. 97-424) as one that allows STAA vehicles[5] and 53-foot trailers to use it as well as any other highway within one linear mile. As a Qualifying Highway, BL 81 would be designed with the physical characteristics to accommodate large, heavy vehicles along its length. These characteristics include appropriate horizontal and vertical alignments, lane widths **(12 feet wide),** turning radii, sight distance, and auxiliary lanes with acceleration/deceleration lanes of sufficient length and storage (see Design Criteria Tables in **Appendix C-6** for more information about design characteristics). For example, all city street intersections would be designed to allow buses and SU-30 (single unit with three axles) trucks to turn at them, and highway ramps would be designed to accommodate WB-67 (53-foot tractor trailer) trucks. Under the Community Grid Alternative, Qualifying Highways, including BL 81 and interstate system roadways, and designated truck access routes, including local roadways, are subject to change from the existing condition. These changes are identified in the Designation/De-Designation Package (contained in **Appendix B-5**). The analysis of the alternative's potential impacts on truck traffic is included in **Chapter 5, Transportation and Engineering Considerations**.
>
> STAA vehicles are tractor trailer combinations greater than 65 feet, tractors with 28-foot tandem trainers, maxi-cubes, triple saddle mounts, stinger-steered auto carriers, and boat transporters.

July 2021
PIN 3501.60 3-42

*The Qualified Highway designation allows the largest size diesel trucks to travel through on 12 foot wide lanes. Urban highway experts recommend an 11 foot width as adequate which also encourages slower speeds. It is recommended that we ask DOT to exclude the section of BL 81 in the 30 mile per hour zones where the 12 foot width is not needed and creates poor air quality from the diesel trucks for Pioneer Homes, the hospitals and downtown. This excluded section would include from the 30 mph zone on BL 81 at the new roundabout north to where Pearl and Oswego Streets reconnect with the high speed BL 81 highway north section.

1. The whole BL 81 doesn't have to be accessible. Here is an example of an Exception in the NYS Highway book regarding Qualified Highways:

RESTRICTIONS - EXAMPLE

A highlighted restriction may be encountered in the listing of the designated truck access highways. The following is a sample:

Karlada Drive US 11 to a point 300 feet west in the City of Binghamton. (BROOME)

[SEE RESTRICTION # 7]

Restriction # 7 = tandem trailer combinations, 96" width ONLY

This is also an environmental justice issue that deserves our highest consideration.

3.Sharrows of Death

Jeff Speck, the renowned city planner and urban designer who Syracuse invited to speak a couple of years go in the Civic Center, in one of his latest books has a page illustrating the "Sharrows of Death" as some people have called them (Goggle it; there are lots of references). A sharrow is the big painted symbol you put on the pavement of bike lanes with a symbol of a bike indicating it is for bikes. Syracuse has a few of them already and NYS DOT plans to add a lot more under the I-81 Community Grid project.

But what Speck and others warn about and call out as Sharrows of Death is when there isn't room for a separate bike lane and the big sharrow symbol is put right in the middle of the driving lane implying that the poor biker at 8 to 10 miles per hour now has to complete with cars, SUVs and semis going 30 mph in the same space. Speck and others point out that it's not the semi driver whose going to get killed, it's the biker because they had a false sense of security. They say it's safer without the sharrow which can give a false sense of security.

Syracuse has recently added some sharrows of death on South Crouse, for example, and DOT on their drawings show lots more being added. Some examples would be at the transition to MLK Drive, which is just a two lane road, at the transition to the new BL 81 roundabout right in

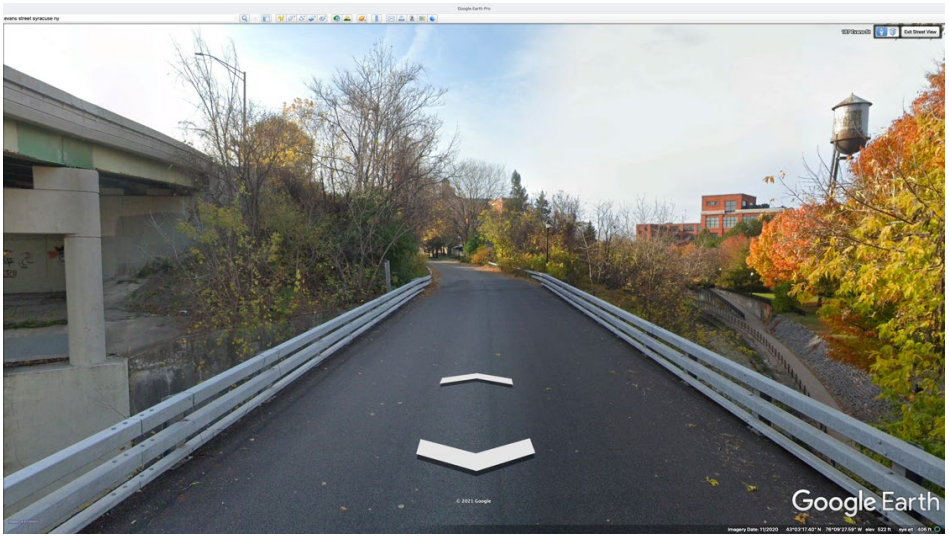
front of Martin Luther King School. Also on North Salina Street in the tight space where it passes under the big new I-690 bridge, N Clinton St, and N Franklyn St all of which are one lane in each direction meaning a big truck wanting to pass a bike going at 10 miles per hour has to go out into the opposite direction lane in order to pass. Not a very safe condition.

When the personal injury attorneys discover that their client was injured--or worse, killed--on what many experts call a Sharrow of Death, one would imagine that they would salivate. Kindly consider requesting that DOT not include these in the project.

4. Path to Nowhere

The DEIS drawings show a new concrete shared path—meaning it is for bikes and pedestrians--(drawing attached shown in yellow) starting south of rebuilt I-690 running from West Genesee Street across a lawn area and then adjacent to Onondaga Creek on the west side under 7 reconstructed I-690 bridges and then climbing up a very steep embankment to Evans Street (ever heard of Evans St before?). The climb up the steep embankment, which starts almost at the creek edge will be a torturous switchback (very expensive, incidentally) which by ANSI handicapped standards required by the NYS construction Code can't exceed 1 in 12 slope with handrails both sides and no longer than 30 feet long with between landings. It will probably have 6 switchback sections back and forth totaling 150 feet in length assuming the rise is say 12 feet.

Then, surprise, you are on tiny little Evans Street, not even having sidewalks, with a sharrows of death leading you in the east direction if you want to continue on. It looks like DOT is rebuilding it to the east and is showing a sidewalk in that direction although there is only a guard rail there now to keep you from falling off the bridge into the Creek way down below.



Evans Street

A suggested substitute which folks might enjoy would be to terminate the shared path before it goes under the 7 bridges and have, say, an area of park benches, an open areas for little kids to play and a couple of concrete or metal tables for eating or games. Make it a mini destination, not a "path to nowhere."

5. Shared Paths

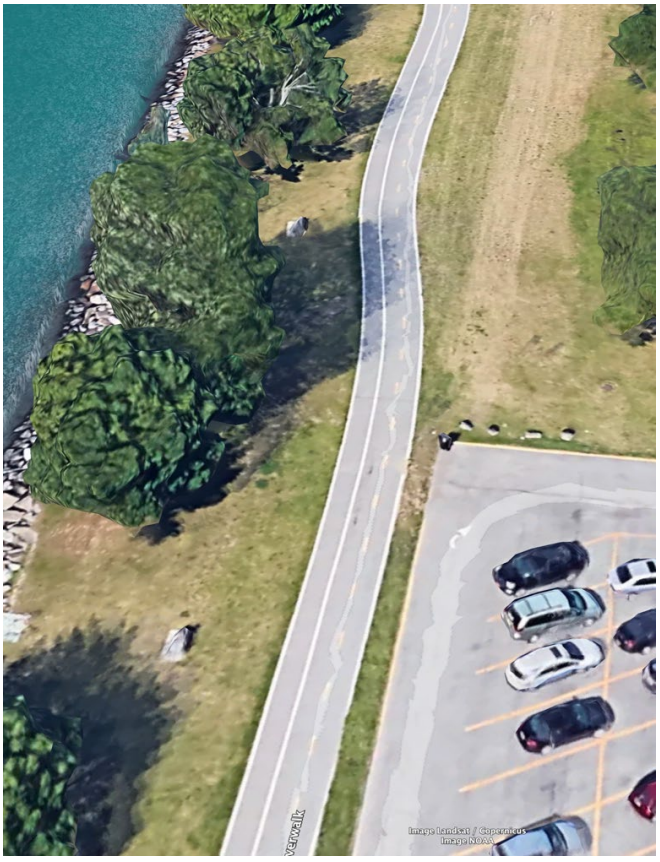
NYS DOT has added what they call "shared paths' in a number of places like the path to nowhere discussed above. These are concrete walks ranging from 10 feet to 14 feet wide which run parallel to BL 81 in most cases where this is both the walking side walk and the bike trail combined (no separate bike trail) The most prominent of these shared paths runs from the MLK Drive sidewalk along the west side of the new BL 81 up to Adams Street. There is also a 10 foot wide shared path (people and bikes) crossing the new bridges at E Glen Ave and Butternut Street and several other places.

When the combined path gets to Adams Street it, it separates to both sides of the street. So on the west side of Almond Street (BL 81) there is now a 10 foot wide bike lane going south separated by 14 feet of grass from an 8 foot wide sidewalk and the same on the east side of

Almond where there is a 10 foot bike lane going in the north direction plus an 8 foot sidewalk separated by 14 feet of grass.

The issue here is safety. The photo below shows the combined trail/path along the river running many miles into Buffalo which is 12 feet wide. But it is clearly marked off into three (4') foot sections- the west side for walkers, the middle side for south bound bikers, the east side for north bound bikers. I have been on this trail and it appears quite safe. The Onondaga Lake walking and biking trails/paths on the upper east side of the lake are clearly delineated where bikers must stay on the road portion and are not allowed on the walking path. A bike going 15 miles an hour coming up behind an unsuspecting walker can cause a very bad accident. Once again, personal injury attorneys salivating. Please consider, DOT, that combined paths be like the Buffalo one, marked and 12 feet wide as shown below.

Buffalo shared path 12 feet wide



7. Justify Widening North Section of BL 81

NYS DOT is tearing down all the three new bridges that were built across old I-81 north section a few years ago and replacing them with new longer bridges because they are adding a lane

and reconfiguring the north section of BL 81. Genet Ave is also being rebuilt on the west side. This may cost hundreds of millions of dollars and may be very disruptive to local traffic.

Can NYS DOT justify this huge disruptive expense in the light of two factors:

1. Presumably a percentage of thorough traffic which would have used the old I-81 will now divert to the improved bypass I-81 (former I-481). The dozen or so stop lights on the lower section of BL-81 will also encourage this.
2. With changing work habits caused by the *work at home experience* during the covid 19 lockdowns, but now predicted to continue to a lesser extent, the future traffic peaks on BL 81 will undoubtedly be noticeably less than predicted, not more.

8. Colvin St Interchange- With some of the money saved, NYS DOT please consider building a full 4 way Teall Ave size interchange at Colvin Street instead of half an interchange as now proposed.

9. Design Details- Since NYS DOT is planning to do the I-481 rebuilding work first, it would be appropriate to have the time to discuss and review with the city the many details not yet shown in any detail like, landscaping, lighting, signage, sound barrier design, bridge aesthetic design, signaling and traffic control.

10. Curb Cuts- Incidentally, DOT is not conforming to the city's 20 foot curb cut requirement. That's going to upset a lot of folks who did have to conform.

Respectfully,

Dave Ashley

David C Ashley, AIA,101 Bradford Ln, Syracuse, NY 13224, 315-751-6382, davidcashley@gmail.com

From: Frechette, Mark (DOT)
To: Bjorness, Joan E (DOT)
Subject: FW: I-81 Viaduct Project Comments
Date: Thursday, October 14, 2021 11:57:10 AM

Comment 81.

From: John E. Auwaerter <jeauwaer@esf.edu>
Sent: Thursday, October 14, 2021 9:34 AM
To: Prockup, Jessica (DOT) <Jessica.Prockup@dot.ny.gov>; Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>
Cc: Mackay, Daniel (PARKS) <Daniel.Mackay@parks.ny.gov>; Rick Naylor <rjnale@hotmail.com>
Subject: I-81 Viaduct Project Comments

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Dear Mark and Jessica,

I am writing as a member of the I-81 Section 106 Consulting Parties to offer the following comments on the July 2021 DEIS:

The SHPO's finding (or agreement with FHWA and DOT) that there is no adverse effect of the I-81 Viaduct Project on Oakwood Cemetery is incorrect in my opinion. This finding is based on an outdated view of direct project effects on buildings and structures, not on the larger historic landscape. As you know, Oakwood Cemetery is a historic landscape that is adjacent to and overlooks I-81; the current proposed boulevard/community grid starts just 150 feet north of the main gate. This design will introduce additional noise intrusion into Oakwood as cars and trucks slam on their brakes on approach to the first traffic intersection at MLK School. More importantly, the design will maintain the adverse effect of the current highway in blocking the Oakwood Cemetery gate and inhibiting viable use and public access to the original and most historic section of the cemetery.

In my opinion, there must be mitigation for Oakwood Cemetery as part of the Section 106 review. If the design of the roadway as it extends along the frontage of Oakwood Cemetery is redesigned in response to community concerns about the roundabout near the MLK School, I hope this will be an opportunity for DOT and FHWA to reopen and reassess its findings of effect on Oakwood Cemetery.

Will you be convening the Section 106 Consulting Parties to seek comments on the current DEIS, or future revised plans?

Thank you.

John Auwaerter
Co-Director, SUNY ESF Center for Cultural Landscape Preservation
Board Member, Historic Oakwood Cemetery Preservation Association

Cc: Dan Mackay, NY SHPO
Rick Naylor, President, Historic Oakwood Cemetery Preservation Association

Mark Frechette, PE

OF course I use 81 and have no problem navigating it The way it is. While some improvements would be helpful - especially To The hospital on The hill - congestion is rarely a problem. Secondary routes are also handy. Properly maintaining what we ~~and adding~~ have and adding decorative updates makes more sense. It is very rare to get imput by The "people" on any issue so Thank you.

Thanks John Barnett

John Barnett
5083 Clifton Dr
N Syracuse, NY 13212

SYRACUSE NY 130
4 OCT 2021 PM 3 L

2021 ENERGY ACTION MONTH

Mark Frechette PE
NYS DOT Region 3
333 East Washington St
Syracuse, N.Y
13202

13202-142875

Donald C. Blair, MD
Nancy L. Dock, PhD
5188 Peck Hill Road
Jamesville, NY13078

RECEIVED
SEP - 3 2021
BY:

Mark Frechette, P.E.
Project Director, NYS DOT, Region 3
333 East Washington Street
Syracuse NY 13202

Rick Marquis
Division Administrator,
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany NY 12207

Gentlemen:

My wife and I moved into DeWitt in 1974. Though we live in a suburb, we have always been aware that Syracuse is the dominant political, social and economic entity in Onondaga County, indeed, in Central New York. Regarding the I-81 Project, we do not share what is touted by suburban leadership to be a majority opinion: that I-81 elevated highway must be continued through Syracuse, in large part to protect the suburbs from perceived ills of noise and traffic. This is not only self-centered, but it is quite short sighted. The wellbeing of the city of Syracuse is paramount; the economic health of the suburbs is ultimately dependent upon Syracuse.

We would like to present three of many, many possible points:

1. The leadership and populace of the City of Syracuse have repeatedly stated their preference for the surface grid solution; we endorse their decision.
2. We support the reopening of the Almond Street Gate to Oakwood Cemetery. This would go a long way toward normalizing the divided city.
3. The reality-based component of suburbanites' traffic and noise concerns should be thoughtfully, imaginatively, and generously supported: additional sound barriers, additional lanes, new intersections, new accesses, etc. For example, a dedicated access to I-690 for the Lyndon traffic (I-481 by Wegmans in DeWitt) directly to I-690 would be terrific, and appears to be feasible.

We strongly support a more expeditious time line for the project. All decisions will be hard and controversial. Make them, and move forward.

Sincerely,

Donald C. Blair, MD
Nancy L. Dock, PhD

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Legislator, 16th District

Randy White, *Outreach Specialist,*
Syracuse Cure Violence (SNUG)

October 13, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street Syracuse, NY 13202

RE: The I-81 Viaduct Project Public Hearings for the Draft Environmental Impact Statement

Dear Mr. Frechette:

I am writing to you on behalf of Blueprint 15, a not for profit organization recently formed in partnership with the Syracuse Housing Authority (SHA) which has a bold vision for the holistic revitalization of the neighborhood bounded by East Adams, I-81, and Salina Streets. Together, the partners are working to create an environment where individuals and families -- especially children -- thrive and have genuine hope for successful futures and expectations that they will make important contributions to the world around them.

Thank you for all of the work that has been completed to date to develop the DEIS and plan for I-81. Blueprint 15 is in favor of the community grid and the opportunity to correct many of environmental, social, and racial injustices caused by the very existence of the I-81 bridge. The decision to build I-81 in its current location, which was known as the 15th ward in 1960 was about race, economics, and privilege or lack thereof. Many homeowners and business owners were displaced with little to no support.

Unfortunately, this is not a unique experience to the city of Syracuse. Many urban neighborhoods with a majority African American occupancy had experienced the same tragedy throughout America. Blueprint 15 stands in full support of the concerns expressed by the Urban Jobs Task Force (UJTF), the New York Civil Liberties Union (NYCLU), Centerstate CEO's 10 Points of Enhancement, and the Syracuse Housing Authority (SHA). Our collective goal is for all affected residents to thrive throughout the redevelopment and have access to the health, housing, job training and placement, and business development supports with the goals of environmental, racial, and economic justice targeted to this neighborhood.

Blueprint 15 firmly opposes the traffic circle/roundabout near STEAM at Dr. King Elementary School, and we were excited to learn that this is being reconsidered. While Blueprint 15 is sensitive to the impacts felt by other communities, our priority is the community most impacted, which are the neighboring Syracuse Housing Developments (Pioneer Homes, Toomey Abbott, McKinney Manor, AOT, and Central Village).

Blueprint 15 would like access to economic opportunities for the residents in the area most impacted by the deconstruction of the I-81 bridge and the construction of the community grid. We would like protected land use and protected health and wealth for the residents most impacted. We would like protection for the students who attend the STEAM at Dr. King Elementary School. We believe that residents in the area should have access to appropriate healthcare services, mental health services, air quality monitoring and abatement, sound monitoring and abatement, independent and confidential reporting process for residents' health issues, such as an environmental health registry. We are also requesting Voluntary Housing Vouchers for the residents in that area who wish to relocate both temporarily and permanently.

Blueprint 15's main points of emphasis are the following listed below:

Voluntary Housing Vouchers For Residents

- Targeting individuals who would be most adversely impacted by the construction phase of the project and seek to voluntarily be relocated. Due to physical and / or mental disabilities, their mobility impairments, and other special needs they may choose this option during construction.
- To be used for a variety of options, such as offer access to affordable homeownership, rent subsidies, and/or temporary relocation assistance.

Protect School Children

- Create a comprehensive construction plan in collaboration with parents, faculty, and staff at the Syracuse City School District.
- Move the proposed highway access ramp so it is at least 600 feet from STEAM at Dr. King Elementary School.
- Relocate the roundabout away from STEAM at Dr. King School.

Protect Health and Wealth

- Conduct cumulative and ongoing exposure analyses for residents who live within 600 feet of the viaduct that includes a lead, noise, and air analysis and abatement.
- Conduct a community health needs assessment specific to this neighborhood, with baseline health indicators.
- Do not use Wilson Park as a staging site for construction or construction materials.
- Create a Community Restoration Fund.

Access to health services/ mental health resources

- Development of an on-site health clinic at Toomey Abbot Towers staffed by experts to provide prompt virtual and in person care. Services should include primary care, pulmonary care, audiology services, and occupational health.
- Ensure access to Upstate and other health related services remain available and easily accessible during the project.
- Continue to monitor and assess residents' health, (such as a through an environmental health registry – additional details below).
- Availability of mental health resources in on-site health clinic and conduct appropriate outreach to connect people to these services.

Access to Opportunity

- Jobs generated by the project must go to the people who live directly adjacent to the viaduct and the maximum percentage should go to Black and Brown Syracuse residents, no less than 30%.
- There needs to be a strong commitment to inclusive employment and contracting opportunities, providing preference for contractors and employers that ensure jobs created by the project are filled by local M/WBE contractors and residents.
- The DOT must provide independent oversight to ensure the goals of the labor agreement are met, using an Independent Compliance Officer. This ICO should not only meticulously collect data on workforce hours and demographics, but it should regularly provide full disclosure of this workforce data to the public, including the Urban Jobs Task Force.
- Provide governmental oversight on all aspects of this project until it is complete.

Blueprint 15 recognizes the significance of this project and its ability to serve as a catalyst to the holistic revitalization of the community we serve, providing unprecedented opportunity and access to building generational and sustainable pathways to economic independence and choice. Thank you for the opportunity to share our thoughts, and we know you share our common goal in centering the people in our community in all decisions made, which has not always been the case in the past.

Sincerely,

Raquan S. Pride-Green, MA
Executive Director, Blueprint 15, Inc.

RECEIVED
SEP 13 2021
BY:

Mark Frechette, P.E.
Project Director
NYS Department of Transportation, Region 3
333 East Washington St.
Syracuse NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue,
Suite 719
Albany NY 12207

September 9th, 2021

Dear Sirs-

A number of residents from the town of DeWitt attended the Public Hearing regarding the I-81 Viaduct Project Draft Design Report (DDR)/Draft Environmental Impact Statement (DEIS) held at Mott Rd Elementary School on September 8th. The discussions with the DOT representatives exposed an array of proposals and "improvements" that will yield potentially negative impacts to the people of DeWitt in regards to basic environmental concerns. Chief among these concerns are:

- The **massive increase of highway traffic** on the new "Rt 81" going through the heart of DeWitt every day. This increase in volume will **more than double** and no representative could answer if those models included potential increases from the Amazon distribution center in Clay as well as other economic projects in the Region such as the expanded railyard in East Syracuse.
- The impact on traffic on Rt 92 as a result of the removal of the eastbound "clover leaf" exit (3E) and **the addition of a 4-lane traffic light on East Genessee St.** Brian Damiani (DOT) explained that the goal of this complete redesign was to eliminate the "difficult" merge of people from that existing cloverleaf across lanes to access the turn lanes into DeWitt Wegmans. Surely there must be a more prudent and less disruptive solution to such a minor issue.
- In regard to increased noise pollution, Justin Kellogg (DOT) informed us that **DeWitt residences and neighborhoods do not qualify for sound barriers due to a low level of population density.** Yet, there were renderings for a sound barrier on the east side of the new "Rt 81" at the DeWitt Town Hall where no residences exist. Mr. Kellogg claimed that the increase to nearly 70,000 vehicles per day will have negligible impact in regards to sound pollution based on "modeling"; this claim seems far-fetched and fantastical.
- In speaking with several DOT representatives, they shared that **there are currently NO ENVIRONMENTAL STUDIES on the impact of emissions from idling traffic** from the new traffic light: both on Rt 92 (eastbound) and in the now extended 4 lane-off ramp next to the Pickwick neighborhood. Reassurances that the overall emissions impact of the project "regionally" fall far short if **the air is unnecessarily more polluted in areas adjacent to neighborhoods** with children and elderly populations. This fact made us wonder what the actual emissions impact will be on the **Southside which will now see 44,000 vehicles** enter their neighborhood every day.

- In conversations with several DOT representatives, it became abundantly clear that they are both **unfamiliar with the local area and network of roads and patterns of lifestyles.** A few potential outcomes are easily predictable based on human behavior:
    - As south and eastbound traffic backs up on Erie Blvd north of Kinne Rd due to the new traffic light on Rt 92, traffic will pour into the **Orvilton neighborhood** in order to move west on E Genesse St.
    - As residents of Fayetteville and Manlius attempt to avoid a 4-lane traffic light at the end of the exit ramp, they will choose to exit at Jamesville Rd and traverse east via **Woodchuck Hill Rd** – a road that is ill-equipped for an increase in traffic, especially at times of day that **students and busses** are accessing the high school.
    - There was no familiarity nor input regarding the added congestion to back-ups from the traffic light at the intersection of eastbound Rt92 and Erie Blvd and the already **congested intersection during peak hours at Jamesville Rd**. In fact, these intersections do not even appear within the literature presented to the public.
    - Residents of **Fayetteville will now seek alternative routes into the City of Syracuse** via Kirkville Rd and Woodchuck Rd to avoid the 5 traffic lights on E Genessee St starting at Lyndon Corners through Jamesville Rd.
- There was vague discussion of adding a lane on eastbound E Genesse St **at the Ambergate base of the DeWittshire neighborhood** to both service an expanded "Rt 81" on-ramp as well as to handle the increased flow of idling cars at the new traffic light. No specific answers were given in regards to **the encroachment into the DeWittshire neighborhood** which is necessary in order gain that space.

Perhaps what was most disconcerting was **the lack of familiarity and knowledge with these very basic concepts and concerns**. Admittedly – there was no environmental impact study produced in regards to noise, sound or emissions at a meeting meant to disclose those very pieces of information. Every answer pointed to "models". However, upon full disclosure, those models admittedly did not include 2 key variables: human choice and increased future economic activity.

Increasingly, as this project is being unveiled to the community "at the eleventh hour", we are learning about other concerns from members of other communities across the Region. While we can not speak directly to those residents' concerns, learning about the 40,000+ cars and trucks that are set to spill into the Southside neighborhood as well as the impact for residents who live on the Westside and desire to head South yielded no good answers from DOT representatives as well.

Everyone agrees and understands the Rt81 as it exists is past it's useful lifespan; we are not "change-resistant" However, the solutions and information shared at this forum **caused grave concerns that the government's solution will cause exponentially more damage than good.** We strongly urge our civil leaders to seek an alternative solution to this current plan.

Sincerely,

Arlene Borden

Arlene Borden
Dewittshire Neighborhood

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Subject:	FW: The New I-81 in Central New York proposal
Date:	Thursday, October 14, 2021 4:41:47 PM
Attachments:	Scan.pdf

Comments.

From: Stephen W. Buechner, RLA <sbuechnerrla@twcny.rr.com>
Sent: Thursday, October 14, 2021 4:26 PM
To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>; rick.marquis@dot.gov; dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>
Cc: sbuechnerrla@twcny.rr.com
Subject: The New I-81 in Central New York proposal

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Please see my attached letter dated October 13, 2021 regarding the New Syracuse I-81 Viaduct Project.

Thank you,

Stephen W. Buechner
Landscape Architect
Licensed NYS # 000485

STEPHEN BUECHNER, RLA, ASLA
TREETOPS
1234 James Street
Syracuse, NY 13203

Phone : (315) 263-1936

sbuechnerrla@twcny.rr.com

October 13, 2021

To : Mark Frechette and Rick Marquis

Re : The New I-81 in Central New York

My involvement with the Syracuse I-81-Viaduct Redevelopment Project started when the officers of the Upstate Chapter American Society of Landscape Architects asked me if I would attend all of the public meetings, and keep them informed of the progress. I agreed and have attended 60+/- meetings and presentations over the last 13+/- years. In the meantime, I was President of Reimann Buechner Landscape Architects & Urban Planners, and most recently an Associate Vice President of Barton & Logudice Engineers & Landscape Architects. While at Reimann Buechner, I was Partner in Charge of over 1,800 projects. Local projects included the Syracuse Creekwalk, the Around the Onondaga lake bike & hiking trails, Radisson New Community and Franklin Square.

The first meetings with SMTC got off to a rough start, with incomplete presentations and drawings of the "new" I-81, that were difficult to understand when projected on screens at the meetings. After attending these meetings through the years, I felt that the various concepts that were made for re-construction of the "viaduct" were short-sighted, not up to modern design standards, and NYS DOT was selecting solutions that would have a negative impact on the City of Syracuse, the surrounding towns to the Northwest, because of the lack of direct connection to and from I-690, and the towns to

the east – Fayetteville, Manlius, Dewitt – because of the additional traffic on 481. This lack of connectivity still is missing in the present plans. In almost all of the "Public Hearings", the time allotted for meeting participants was very limited, and many of the suggested concepts that I had, along with other local professionals, i.e.. provided drawings that were not considered, highlighting better access to the streets of downtown Syracuse, solutions that had better connections to the thru traffic on I-81 from the South and Canada, to and from Dewitt, Fayetteville, Manlius on the East, Clay and North Syracuse on the West, also freeing up space for a downtown green park area (to be funded by grants, etc..) and other concepts that have been built into the highway solutions for progressive cities across the country, including Cincinnati, Duluth, Dallas, San Diego, Seattle and Phoenix. Where are the experienced, creative, accomplished and proficient urban planners and highway designers who have been hired by other states to update their highway system, including urban park spaces, sites for housing and commercial expansion? The proposed alignment of I-81 "business" encourages drivers who are incoming from the South to by-pass Syracuse just South of the city and discourage drivers to take advantage of the many opportunities the city has to offer, including the shopping and recreational facilities and cultural activities in downtown, Franklin Square and Destiny USA (one of the largest shopping malls in North America) that pays a huge amount of property taxes to the City of Syracuse every year. Why by-pass all of this traffic to the areas east and North of the City? Other concepts such as tunnels and fly-overs have been rejected without proper (in depth) consideration. The proposed I-81 Business link, following the present route of I-81 from the 50's more-or-less, is not a good accepted modern solution. The City of Syracuse deserves more than what the present proposed plans are showing.

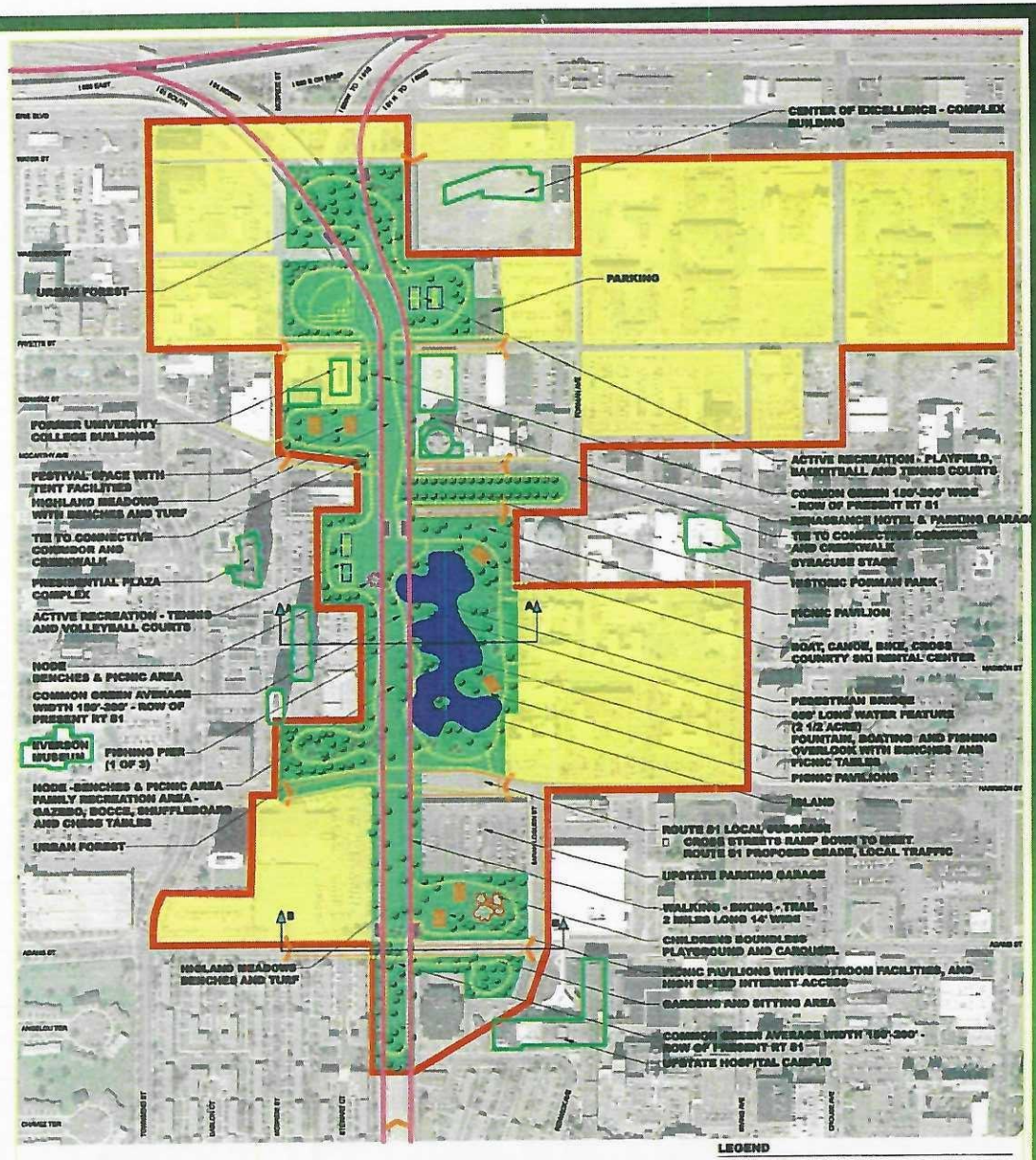
The Grid System proposed for Syracuse is not acceptable to many of the knowledgeable City of Syracuse and Onondaga County people I work with, and must be rejected. The Grid System will

cause further poverty and business decline in the City of Syracuse. Other concepts must be explored. When a tunnel or fly-over was suggested, NYS government officials rejected this idea because it would be "expensive" and would take ten years for a contractor to build a tunnel or fly over.

If the idea that was borne when the "Transcontinental Railroad" was in the planning stages getting to and from the West coast, by rail, built from the East coast, it would take many years, so the contractors started from both the East and West ends and met in the middle. Why couldn't a tunnel be built, starting at the North and South ends, with the final connection as shown on the attached drawings. The plans for rebuilding I-81 need new direction. It is time to hit the rest button, and move from highway planning and construction to neighborhood and community vehicular planning and construction! I have included drawings that I have prepared as conceptual plans and perspectives for some of the concepts that I developed over the last thirteen years for I-81 and I-81 Business. These concepts have received many positive notes and phone calls in support, and letters to the Editor of the Post Standard in support.

Thank you for your consideration and opportunity to discuss my observations over the last thirteen years, regarding I-81's 50-75 year's future.

Stephen W. Buechner
Landscape Architect Licensed NYS # 000485



CENTRAL PARK

THE PEOPLE'S PARK

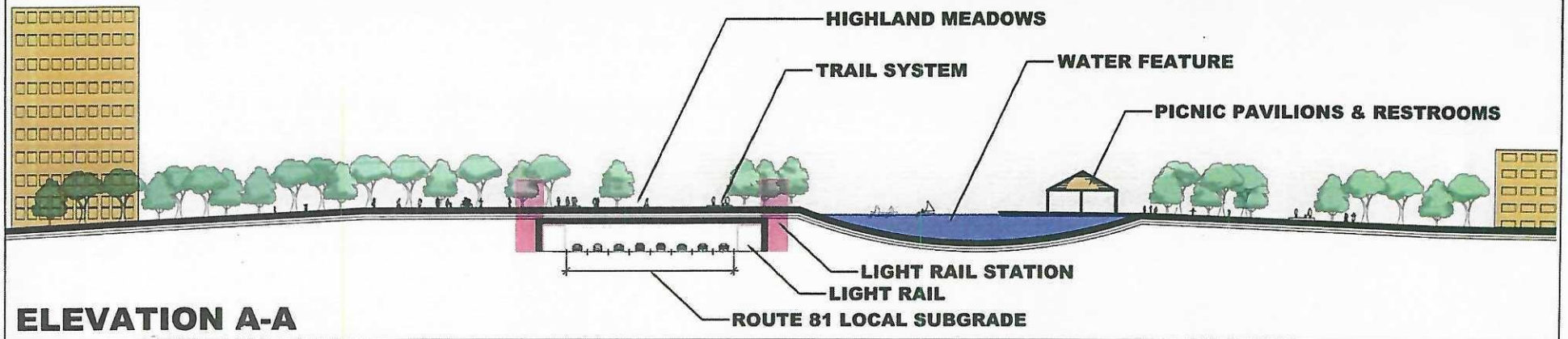
Syracuse, New York

Conceptual Masterplan

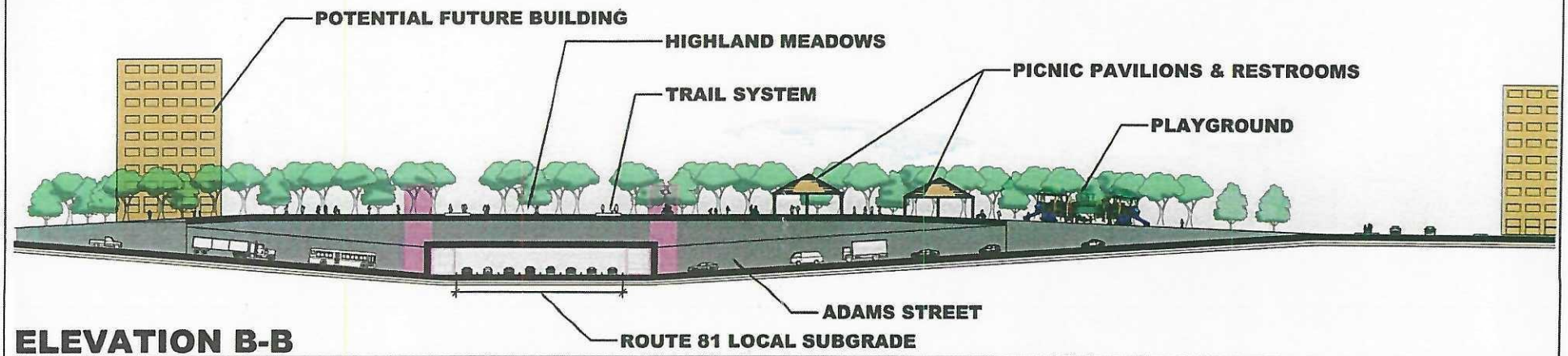
A Green, Neighborhood Revitalization, Park, and Vehicular Circulation Solution

STEPHEN BUECHNER, LANDSCAPE ARCHITECT ASLA. RLA.

APRIL 27, 2010



ELEVATION A-A



ELEVATION B-B

CENTRAL PARK

THE PEOPLE'S PARK

Syracuse, New York

Conceptual Masterplan

A Green, Neighborhood Revitalization, Park, and Vehicular Circulation Solution

ELEVATION A-A & B-B

STEPHEN BUECHNER, LANDSCAPE ARCHITECT ASLA. RLA.

APRIL 27, 2010

0 50' 100'

The Post-Standard
SUNDAY, FEBRUARY 1, 2009
SECTION E

OPINION

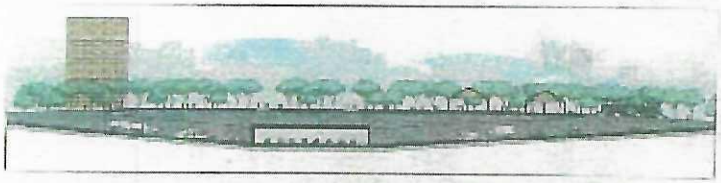
A FANCIFUL LOOK at a new I-81 corridor, with New York City's Central Park imagined in the Syracuse skyline. [Story continues on Page E4.]

A NEW VISION for I-81

Readers react to a landscape architect's out-of-the-box idea for an underground highway topped by a 30-acre 'Central Park'

A New Direction for I-81

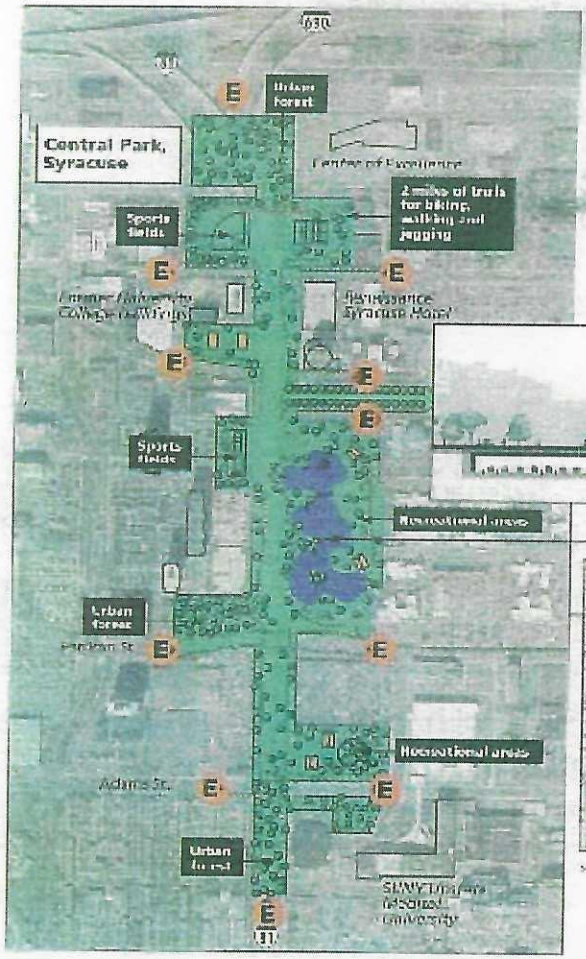
AN UNDERGROUND HIGHWAY

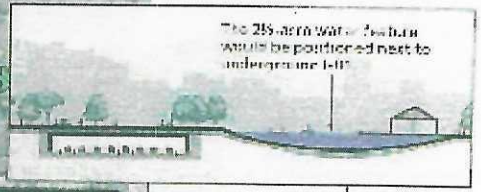


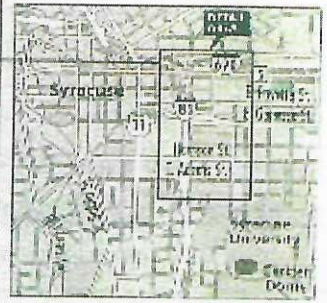
Landscape architect Steven Buechner proposes tearing down the overhead Interstate-81 "viaduct" as it passes through downtown Syracuse. He would replace it with an underground highway-and-tunnel capped by an urban park of about 30 acres. The park would include a small pond, walking trails, picnic shelters, carousel and children's play area.

In Buechner's concept, Interstate 81 would dip underground at about East Adams Street and re-emerge at about East Washington Street. It would be about 25 feet below ground level.

E Multiple entrances and exits to the underground thoroughfare







Source: Steven Buechner

Syracuse, N.Y. -- Ten years ago, as the debate over how to replace the Interstate 81 viaduct through downtown Syracuse was just getting started, the landscape architect who designed the city's Onondaga Creekwalk made a proposal.

Steve Buechner suggested ripping down the aging, elevated highway that critics have long accused of cutting downtown off from University Hill and creating a dark, dreary landscape underneath it.

But instead of building a ground-level network of streets known as a community grid to replace it, he proposed building a tunnel to carry local traffic and creating a 32-acre park, which he dubbed Syracuse's "Central Park," over it.

The park would create an attractive central green space, provide recreational opportunities, including two miles of running trails and a pond, for downtown's growing population, and quickly raise the value of the land around it because people love to live and work near parks, according to Buechner.

Through traffic -- vehicles that are simply passing through the city from the south or north -- would be re-routed around the city on interstates 481 and 690 under his original proposal.

Buechner (pronounced BEEK-ner) hasn't had much to say publicly since making his idea public. The state is studying three options for replacing the viaduct: Building a new, wider elevated highway, building the so-called community grid for

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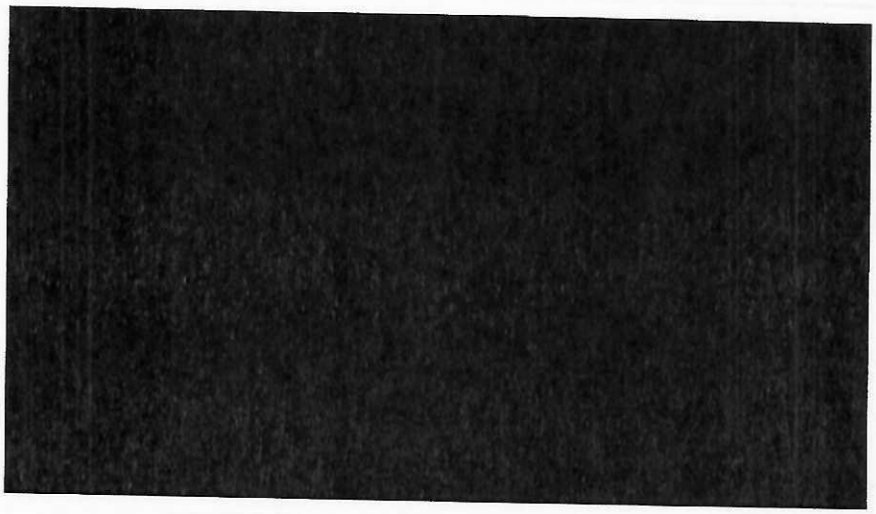
RE-PRINT FROM THE POST STANDARD

local traffic and routing through traffic around the city, or building the community grid and build a tunnel under it for through traffic.



But Buechner, 82, a former planner for the city Parks Department, is talking again about his 10-year-old proposal. He's not happy that no decisions have been made about I-81's replacement and he's disappointed that his proposal for a central park has fallen out of the public discussion after an initial flurry of debate.

He still thinks his idea for a park is a good one, though he's renamed it the James Heath Urban Park after his former boss at the city Parks Department who died in a plane crash in 1969.

In fact, he thinks it's an even better idea now because of the recent surge in downtown's population. In its 2018 annual report, the Downtown Committee of Syracuse reported that the number of people living downtown increased 77 percent to 3,600 in the previous 10 years.

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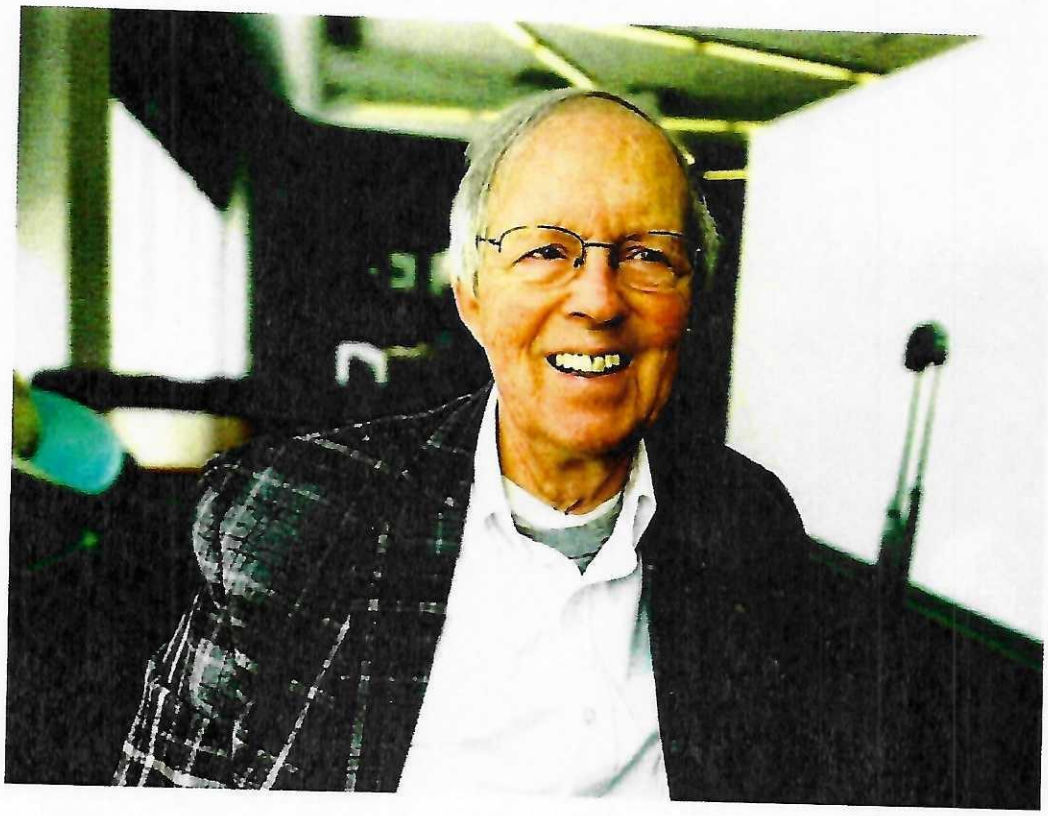
5A

If the trend continues, an estimated 8,000 people will be calling downtown home by 2030, and they'll need and want a central park for recreation, he said.

"Syracuse can continue to be a city like it is right now or it can be very progressive and visionary," he said.



Landscape architect Steve Buechner is renewing his proposal for a central park over an underground highway through downtown Syracuse. (Rick Moriarty | rmoriarty@syracuse.com) Rick Moriarty | rmoriarty@syracuse.com

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Instead of routing through traffic around the city, he is now proposing building a second tunnel, directly below his proposed "subsurface street." That way, businesses along the

6A

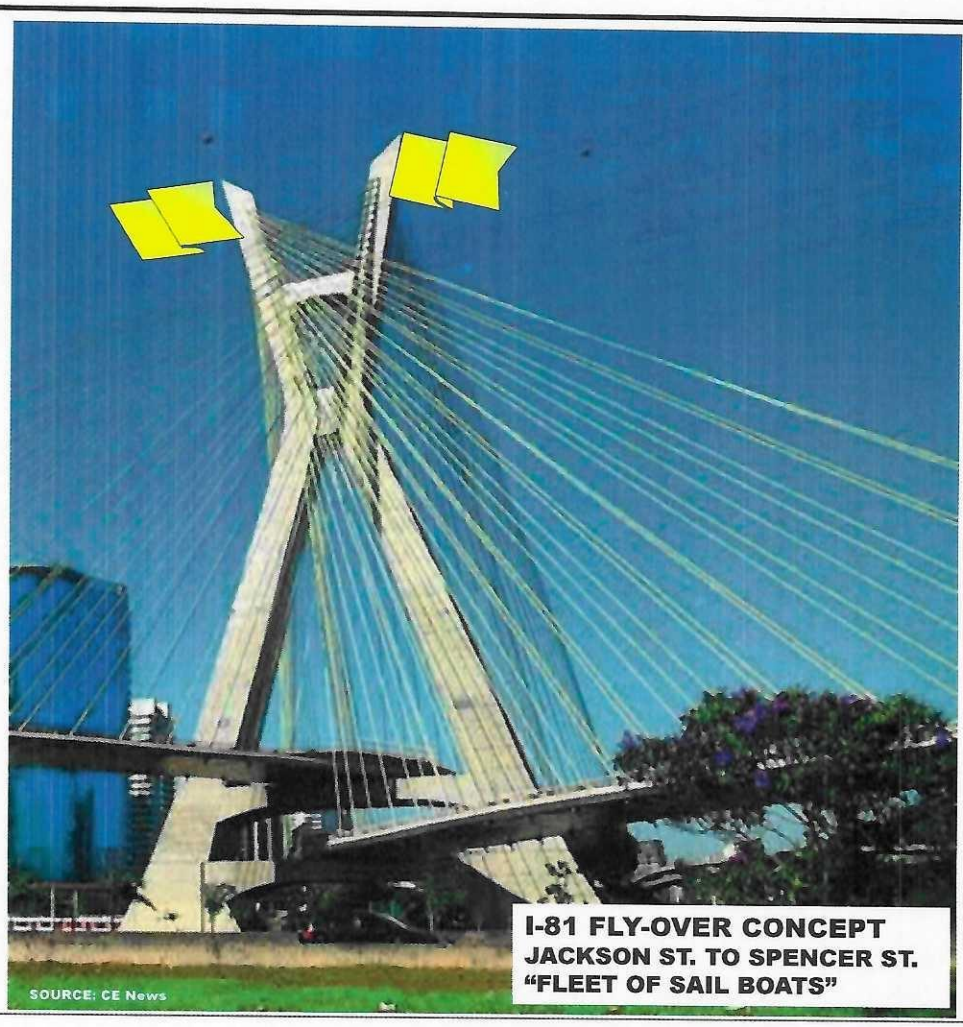
highway that benefit from that traffic would not see their sales hurt by a reduction in potential customers driving by, he said.

But if a second tunnel is deemed unfeasible, Buechner suggests building something much more visible and dramatic -- a mile-long cable-stayed bridge over his proposed park. To make sure the bridge did not block sunlight to the park below, it could be built 40 feet high, he said.

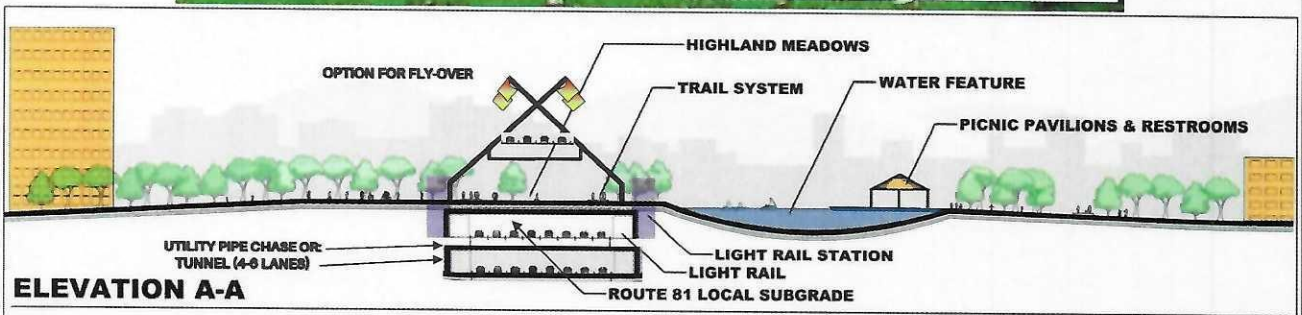
The bridge he's proposing would look a lot like the cable-stayed Leonard P. Zakim Bunker Hill Memorial Bridge that was built as part of the Big Dig project in Boston. With cable-stayed bridges, cables holding up the road are attached to towers that alone bear the load.

"It would look like a giant sailboat over the city," said Buechner. "I think that could be a real nice artistic statement."

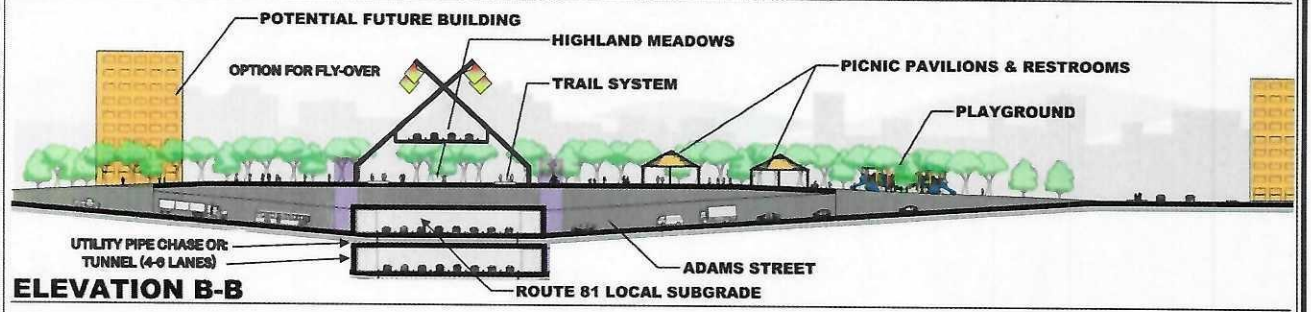
The firm merged in 2006 with the Barton and Loguidice engineering firm, where Buechner remained an Associated Vice President until July 19, 2019, when he was badly injured when an 18-wheeler, turning off of I-81 onto 690 West, crossed 4 lanes of traffic, tore the side of his Mustang convertible off, landed with flat tires, just short of the parapet wall. The truck driver was ticketed for causing the accident by Syracuse Police.



I-81 FLY-OVER CONCEPT
JACKSON ST. TO SPENCER ST.
"FLEET OF SAIL BOATS"



ELEVATION A-A



ELEVATION B-B

JAMES HEATH URBAN PARK

Syracuse, New York

Conceptual Masterplan

A Green, Neighborhood Revitalization, Park, and Vehicular Circulation Solution

ELEVATION A-A & B-B

STEPHEN BUECHNER, LANDSCAPE ARCHITECT ASLA. RLA.

0 50' 100'

APRIL 27, 2010

REVISED: JANUARY 29, 2019

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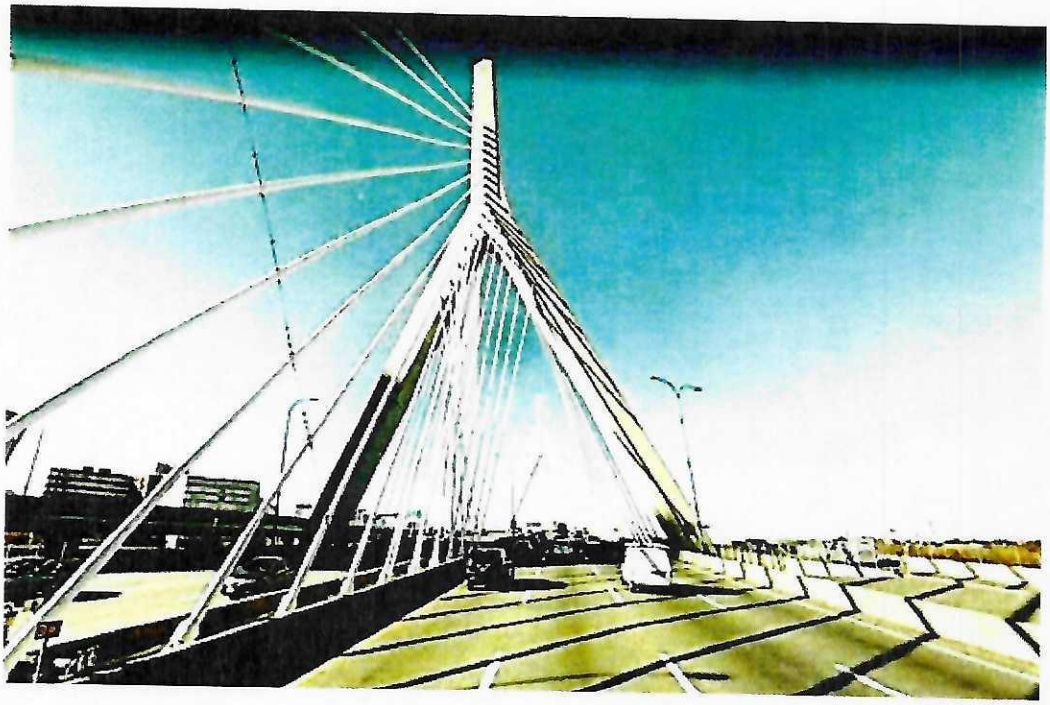
CENTRAL NY NEWS

Architect resurrects I-81 central park proposal, adds 'sailboat' bridge

Updated 9:57 AM;
Posted 9:51 AM



The Leonard P. Zakim Bunker Hill Bridge, a cable-stayed bridge, was built as part of the $15 billion Big Dig project in Boston. (Google Maps)

32

39
shares

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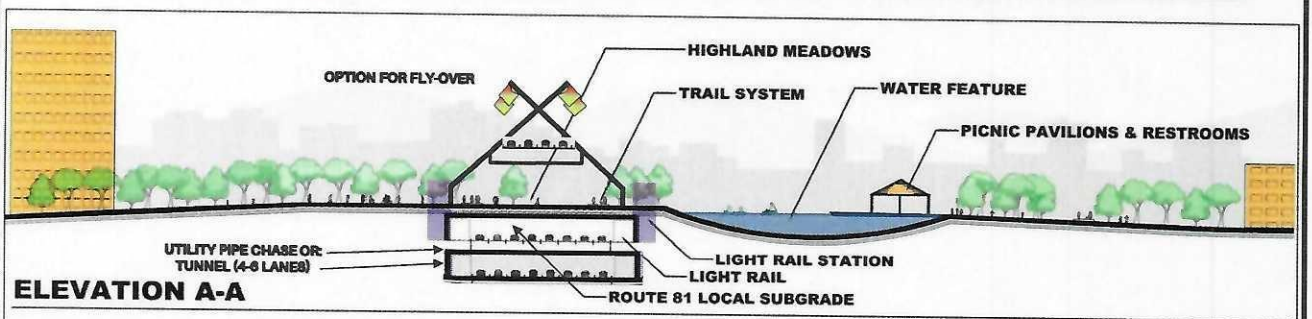
By Rick Moriarty | rmoriarty@syracuse.com

I-81 FLY-OVER CONCEPT
JACKSON ST. TO SPENCER ST.
CONCEPT RENDERING



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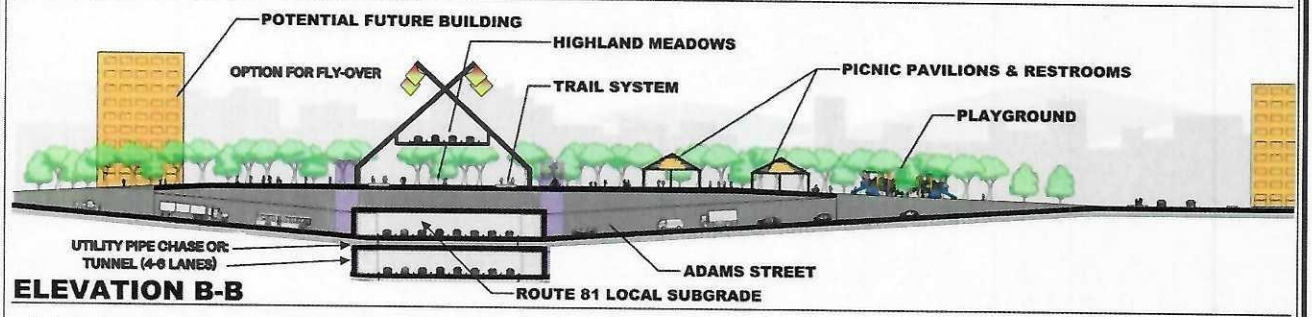

ELEVATION B-B

JAMES HEATH URBAN PARK

Syracuse, New York

Conceptual Masterplan

A Green, Neighborhood Revitalization, Park, and Vehicular Circulation Solution

ELEVATION A-A & B-B

STEPHEN BUECHNER, LANDSCAPE ARCHITECT ASLA. RLA.

0 50' 100'

APRIL 27, 2010

REVISED: JANUARY 29, 2019

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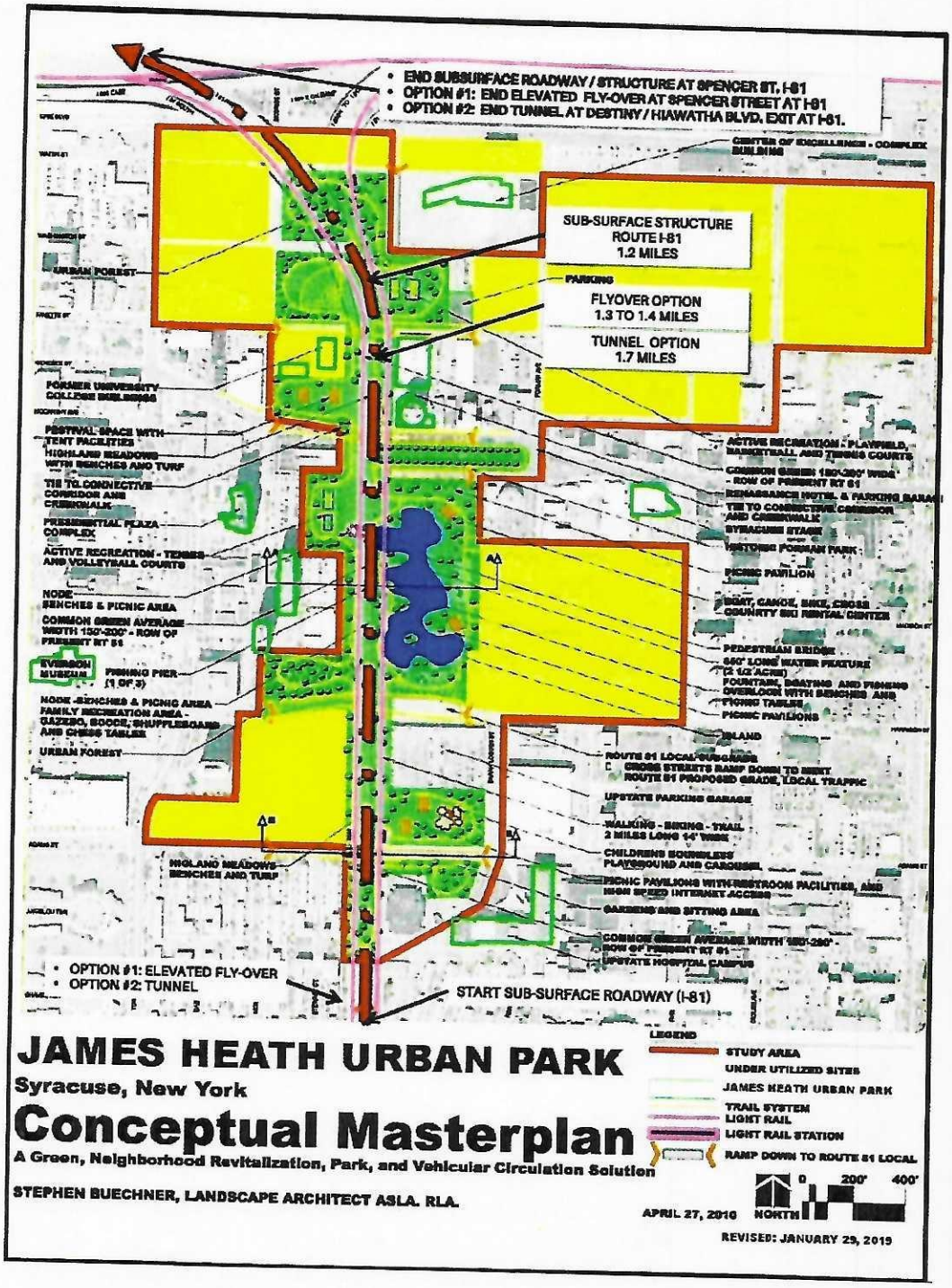

Map shows landscape architect Steve Buechner's proposed masterplan for replacing the elevated section of Interstate 81 through downtown Syracuse. Buechner proposes a 32-acre park (shown in green) over a tunnel to carry local traffic. As an option, he proposes a cable-stayed bridge over the park to carry through traffic.

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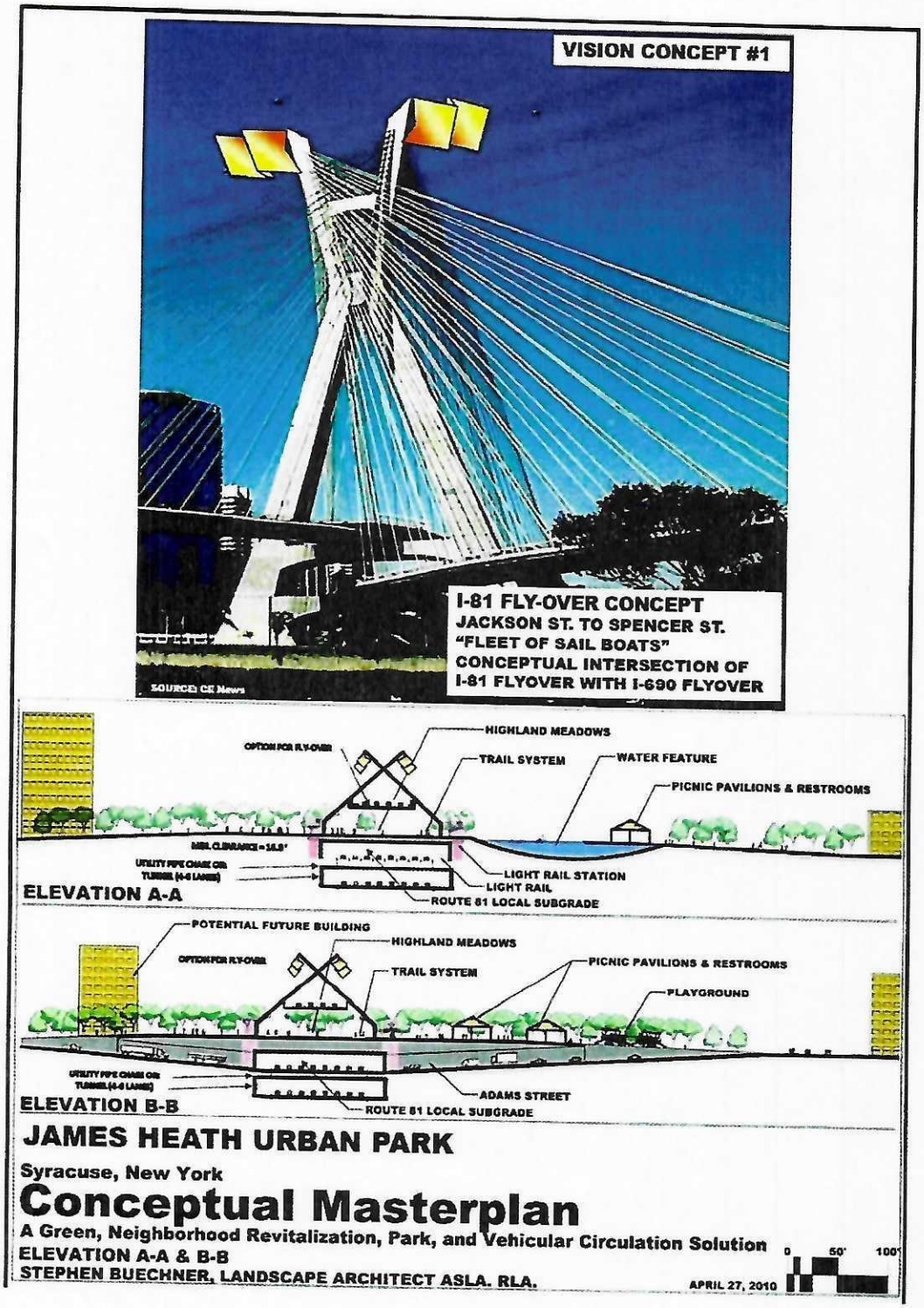
Yellow areas are underutilized sites that Buechner said could be used for residential and commercial development. Courtesy of Steve Buechner

He has changed his proposal a bit, though. When he proposed the park 10 years ago, Buechner thought the best solution for through traffic was rerouting it around the city via Interstate 481. But such a solution has been opposed by businesses along the highway -- in particular, the Destiny USA mall and a cluster of hotels in Salina north of the city.

So, he has amended his proposal to include the options of a second, deeper tunnel or a cable-stayed bridge, which he prefers to call a "flyover."

Buechner worked for the city Parks Department as a planner in the 1960s, then left to start the Reimann-Buechner landscape architectural firm with his former college professor, Robert G. Reimann, in 1969.

The firm designed the park-like pedestrian pathway that runs along Onondaga Creek from Armory Square through Franklin Square to Onondaga Lake. It also designed Radisson, a 3,000-acre residential and industrial development in Lysander known for its curved streets, miles of bike and cross-country ski trails, three neighborhood parks and four man-made lakes that most people assume are natural lakes.



Map shows landscape architect Steve Buechner's proposed masterplan for replacing the elevated section of Interstate 81 through downtown Syracuse. Buechner proposes a 32-acre park over a tunnel to carry local traffic. As an option, he

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proposes a cable-stayed bridge over the park to carry through traffic. Courtesy of Steve Buechner

Buechner said burying urban highways and putting public parks on top is actually a common practice around the country, citing cities such as Cincinnati, Dallas, Duluth, San Diego, Seattle, Phoenix and Boston.

"I don't come up with new ideas," he said with a smile. "I steal ideas from other people."

He has not calculated how much his tunnel or bridge ideas would cost. But whatever the bill came to, it would be worth it if it results in a project that lasts not just 50 years, but 150 years, he said.

"Let's do it and have something that's going to last a long time and have some beauty to it," he said.

Contact Rick Moriarty anytime: Email | Twitter | Facebook | 315-470-3148

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Top High-Yield Savings Accounts For February 2019

1

POST July 12, 2021

RECEIVED
AUG 16 2021
BY:

The Post Standard
220 S, Warren Street
Syracuse, New York 13302

Dear Editor,

I have reviewed the recent stories in the Post concerning pending construction of plans for route 81. It appears that the local politicans and those visiting from Washington are all in favor of the community grid option. I am sure their plan will be endorsed by the New York State Highway Engineers. The decision will involve millions of tax dollars from all of us who live in Onondaga County and may have negative problems in our commuting routes. I spent some 30 years driving from Jamesville to Liverpool all via the present route 81. It would seem the fair way for all those in the county to have a say in the project via a vote in a referendum for or against the grid pushed by politicans.

LETTER NOT IN PAPER!!

Sincerely, Alexander A Burton
6405 East Seneca Tkp
Jamesville, New York 13078

DEAR MR FRANCHI,

IT SEEMS THAT ALL OUR ELECTED FOLKS BOTH LOCAL & STATE WIDE ARE LOCKED INTO THE GRID. WOULD IT NOT BE NICE TO HEAR THE VIEWS OF ALL COUNTY PEOPLE WHO ARE OUR TAX PAYERS THAT MIGHT NOT LIKE THE REMOVAL OF THE NORTH-SOUTH ROUTE OF RT 81. I AM PROBABLY 70% OF COUNTY TAXPAYERS WOULD VOTE NO TO THE PROPOSED GRID. SHOULD THE TAX DOLLARS INVOLVED IN THE PROJECT BE CONTROLLED BY ALL THE PEOPLE IN OUR COUNTY & NOT JUST THE LOCAL ELECTED POLITICIANS WHO WANT TO PUT A FEATHER IN THEIR CAPS!!

Alex Burton

SANDY.BURTON1955@GMAIL.COM 315-992-2396

08/13/2021

Mr. Mark Frechette, PE
Project Director
NYS DOT - Region 3
333 E. Washington St.
Syracuse NY 13202

RECEIVED
AUG 17 2021
BY:

re: Rte 81 Project Grid

Dear Mr. Frechette:

I realize that this project is now going forward and it appears as if the best interests of the county residents have been totally disregarded.

(1) By routing traffic onto city streets will literally poison the residents in those affected areas with extremely high levels of pollution

(2) The gridlock that will occur on city streets will wreak havoc on neighborhoods and motorists.

(3) The loss of business to merchants and ultimate decrease of tax revenues will be devastating.

(4) After dark and during 7 months of foul weather will inhibit people from using the park type areas.

I have attended public meetings with other concerned citizens regarding this project and contacted Elected Legislators and have never been corresponded back. I have been in business and in Law Enforcement for over 30 years and I've witnessed impact of "improvements" and it is mine and the opinion of countless others that this project will be counterproductive in terms of the betterment of the community.

Thank you for your talking the time to read this.

Very Truly Yours
Joseph Laporte V.P.

Sun Chevrolet Inc.

CENTERSTATE
CORPORATION FOR ECONOMIC OPPORTUNITY

For Immediate Release
Aug. 31, 2021

Contact: Elle Hanna
315.447-6065
ehanna@centerstateceo.com

No More Delays: Time is of the Essence for I-81

Community Grid offers the best solution to address long standing transportation and safety needs, while benefiting the region socially and economically

SYRACUSE, NY – Robert M. Simpson, president of CenterState CEO, in Syracuse, issued the following statement in response to calls for more time to study and comment on the future of Interstate 81, subsequent the New York State Department of Transportation release of the Draft Environmental Impact Statement for the I-81 Viaduct Project.

“Since the New York State Department of Transportation’s (NYSDOT) release of the Draft Environmental Impact Statement (DEIS) on I-81, we have heard calls from special interests for even more time to review and revisit the recommended alternative. These represent nothing more than transparent attempts to further stall what has already been an over a decade long debate. Those calling for more time seek to dispute and discredit a laborious and meticulously thorough process by the NYSDOT and ignore the fact that the clear imprint of thousands of citizen and stakeholder comments can be seen within the current DEIS.

“This project has been discussed and vetted for the better part of the past 13 years. Countless studies and meetings have been dedicated to examining alternatives and developing the solution that best meets the community’s goals for the future. By our estimations, NYSDOT has participated in more than 430 meetings with community groups, organizations and other stakeholders, which includes at least 45 opportunities to engage with NYSDOT’s process through meetings open to the public, attended by more than 5,000 people.

“And let us not forget, among the last efforts to forestall the Community Grid was a ’tunnel study’ pushed by opponents of removing the viaduct that cost millions of dollars and several years of time only to reaffirm what NYSDOT had previously found – that a tunnel and/or depressed highway option were neither desirable nor practical.

“Most recently, there have been calls to consider an elevated skyway, which is nothing more than a new name for the elevated highway concept that has already been studied and dismissed through the course of the extensive I-81 process. It was rejected by the DOT because it would increase traffic and air pollution through the city, require eminent domain of more properties and create longer construction disruptions. A proposal that suggests using the name of Harriet Tubman, a revered historical figure who long fought the racist and oppressive conditions that would be reinforced by the skyway concept, is not how we as a community should seek to honor her legacy. Such a divisive skyway would only perpetuate deleterious impacts on the very communities of color who have lived in the shadow of I-81 for 60 years. Let’s honor the legacy of Harriet Tubman by creating solutions to address the racial and social inequities she fought.

"The highway is now four years beyond its useful life and no longer meets current federal highway standards for safety. At stake is injury and loss of life, increased costs and the possibility of missing a once-in-a generation infrastructure opportunity.

"Unfortunately, it has become clear that those calling for more time on an already years long process, or that are introducing even more unachievable alternatives at the eleventh hour, are less interested in maximizing regional benefit than they are in reaching a point where there is no option but to patch, repair and hopefully retain the viaduct. This status quo mentality represents a shortsighted vision that puts parochial self-interests over what is best for the community as a whole – investment and progress.

"How much longer should we have to live with unsafe conditions on the highway? Or to reconnect our downtown, University Hill and Southside? To return property to the tax rolls and land to productive use? To put people, including our region's historically marginalized populations, to work? Or to circulate $2 billion in investment throughout our economy via local contractors and small businesses?

The answer is simple: not one more day.

"Not all our community's social and economic challenges can or will be solved by the future of this 1.2 mile stretch of highway. And they cannot be solved with 'more time.' The NYSDOT has selected the best alternative to move this project forward. The Community Grid offers the best solution to address longstanding transportation and safety needs, while benefiting as many of the region's residents and businesses as possible. We support the NYSDOT while they complete this legally mandated process, refine the plan one final time based on community input, and issue the FEIS and record of decision. After 13 years of debate, delay and continued disrepair, let us finally realize the many benefits that a Community Grid will bring."

About CenterState CEO

CenterState CEO is an independent and forward thinking economic development strategist, business leadership organization and chamber of commerce; dedicated to the success of its members and the prosperity of the region. We serve as an advocate and resource for smart business, catalyze and facilitate regional growth, and promote community prosperity through results-driven partnerships, planning and problem-solving. www.centerstateceo.com

CENTERSTATE
CORPORATION FOR ECONOMIC OPPORTUNITY

October 8, 2021

Mr. Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Mr. Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Dear Mr. Frechette and Mr. Marquis:

CenterState CEO is an economic development strategist and business leadership organization with a vision for a vibrant, globally connected region where business thrives, and all people prosper. We are the largest business membership organization in the community with more than 1,500 members. To achieve this vision, we need modern, efficient infrastructure that connects us to world markets, and to be a place where economic opportunity and livability abound.

We feel strongly that the NYSDOT has selected the best alternative to achieve the goals of the I-81 project and fulfill these aspirations. The Community Grid is the best and most viable solution, as it:

- Eliminates a portion of an elevated highway that has destroyed viable businesses, forced residents to relocate, and created barriers between neighborhoods, commercial and institutional districts, and employment opportunities in Syracuse.
- Will substantially increase the City of Syracuse's tax base by allowing the redevelopment of some of the city's most valuable land. The viaduct eroded the city's property tax base by eliminating tax paying properties and driving down the valuation of adjacent properties, many of which remain as parking or vacant lots.
- Will disperse traffic that has neither destination nor origin in the city. It leverages the existing path of I-481 as part of the solution, which has far fewer impacts as it passes through areas that are undeveloped or were developed around the highway with sensitive receptors, such as housing, hospitals and schools, located further from its path. The Community Grid is also the only solution that calls for needed improvements to the Lyndon Corners and I-481 Exit 3 areas.
- Provides efficient ease of access to the center city via Business Loop 81, which will have less traffic than the existing viaduct and generally comparable or shorter travel times. Central New York will remain the crossroads of the state, with the Thruway and the new Interstate 81 still intersecting in Onondaga County.
- Will reconnect adjacent neighborhoods and will provide a major step toward addressing social, economic and environmental justice issues.
- Has the shortest construction time, thus limiting disruption to businesses and to the city center.
- Addresses safety issues and structural and operational deficiencies of a roadway that no longer meets FHWA standards. Meeting those standards on the path of the existing I-81 requires the

destruction of more buildings, businesses, and residences, without providing the benefits identified above.

NYSDOT has gone above and beyond its legal obligations to include the public in the process through advisory committees, public hearings, and multiple opportunities to provide input. We are grateful for the opportunity to participate in these sessions over the years, and that the NYSDOT listened to CenterState CEO's "Community Grid Plus" recommendations by including seven of our 10 recommendations in the DEIS.

As a once in a generation project, the Community Grid must benefit the people of our region and address social, economic and environmental justice issues. We ask NYSDOT to consider further enhancements to its plan and process, as outlined in our following list of additional comments and recommendations.

We urge NYSDOT and FHWA to move forward quickly to complete the FEIS and issue the Record of Decision. There is an unprecedented alignment of state and federal investment, including the prioritization of I-81 within President Biden's American Jobs Plan that make imperative that this project progress in earnest. After 10 years of discussion and debate, it is time to move forward.

Thank you for the opportunity to comment, and we look forward to working with NYSDOT and FHWA on the implementation of this transformational project.

Sincerely,

Robert M. Simpson

Robert M. Simpson
President & CEO

CENTERSTATE
CORPORATION FOR ECONOMIC OPPORTUNITY

CenterState CEO Priority Recommendations to the I-81 Viaduct Project DEIS

We ask NYSDOT to strongly consider further enhancements to its plan and process:

1. **Address Roundabout Concerns** - While we believe the insertion of a Roundabout along the path of Business Loop 81 is a good solution to reduce speeds and emissions, it is imperative that the community's voice be heard and that the school and its stakeholders receive utmost consideration as improvements are evaluated, including but not limited to, relocation of the roundabout and improvements to the Martin Luther King school itself, such as state of the art air filtration systems. We also suggest NYSDOT utilize roundabouts in other locations (i.e., southern and western communities) to encourage truck traffic to stay on the interstate.
2. **Maximize Developable Land** - We request that the width of Business Loop 81 Right of Way be reduced through the city to return as much land as possible for redevelopment. This may be achieved by reducing the width of the proposed lanes from 12 feet to 11 feet, as well as narrowing the adjacent sidewalk, bicycle infrastructure, median, and green space areas, while preserving areas for infrastructure, storm drainage and snow storage.
3. **Empower the Community Redevelopment Commission** - We ask NYSDOT to work closely with municipalities, residents, and businesses adjacent to the highway to transfer any land back to the community to facilitate redevelopment. This outstanding opportunity must create jobs, housing, and local services while increasing tax resources. We commend NYSDOT's creation of a community redevelopment commission comprised of these stakeholders to ensure the highest quality, most inclusive redevelopment opportunities. We believe this commission should be charged with developing plans and disposing of excess lands, and that it should consider equity as a key criterion for redevelopment opportunities that emerge.
4. **Enhance Mass Transit** - We recommend NYSDOT provide for a more robust mass transit system in Syracuse and the region. The current DEIS language (pages 5-63, P5-187 and 188) only suggests that NYSDOT will "build alternatives to have flexible roadway configurations which would not preclude any future transit systems improvements…" Now is the best time to introduce transit system improvements - in advance of the five-year construction period of this project - when the level of disruption to traffic patterns will encourage many commuters to think about transit alternatives to driving. The NYSDOT Public Transportation Bureau and FTA should be prepared to support both capital and operational funding to the CNYRTA to reduce the number of personal vehicles on the road during and after construction, which will also help attain the state's climate change goals.
5. **Maximize Local Work, Local Hiring and Minority Contracting Opportunities** - We encourage NYSDOT to do all in its power to maximize opportunity for the work to be done by local businesses and residents. CenterState CEO pledges to work with NYSDOT, the City of Syracuse, Onondaga County and regional employment services to create the labor force that will be needed to complete the project, and to ensure that regional businesses, including minority contractors, are well positioned to take advantage of contracting and vending opportunities.
6. **Ensure Ongoing Maintenance** - We recommend NYSDOT provide for a sufficient ongoing maintenance fund to guarantee that the improvements built be maintained in "like-new" condition going forward. The cost of ongoing maintenance and repair should be financed by the state, rather than cash-strapped municipalities, and the standards should be increased. Trash should not be allowed to accumulate, lighting critical for public safety cannot be allowed to go dark, concrete

should not be allowed to spawl, metal fixtures should not be allowed to rust, nor trees and ornamental plantings be allowed to die without an adequate fund for their repair and replacement.

7. **Develop Replacement Housing and Relocation Strategies** - The Community Grid solution is adjacent to many neighborhoods, both urban and suburban. We appreciate that NYSDOT is taking steps to mitigate construction impacts for residents but also understand that these may not be enough for some. Adequate replacement housing should be planned and built, and relocation payments should be provided to families who want to relocate away from the construction zones. We encourage NYSDOT to convene with appropriate local (Syracuse-Onondaga County Planning Agency) and state (NYS Department of State and Homes and Community Renewal) agencies to identify resources and develop a comprehensive housing rehabilitation and build strategy, including financing solutions. The state agencies should work closely with municipalities to implement housing and neighborhood improvement plans and ensure no one is left to live in a construction zone should they not want to.
8. **Communicate Construction Phasing and Impacts** - Lengthy construction may be detrimental to many businesses, particularly those that are destinations for visitors, and that depend on foot traffic or ease of vehicular access. Access to timely information (and mitigation measures where necessary) will be critical. The means to provide both must be planned well in advance. We encourage NYSDOT to continue to meet and share information about the evolving construction project and phasing with the city, county, businesses, organizations and community groups, and to gather feedback.

Additional Comments

- **Construction**
  - We encourage NYSDOT to use Design Bid Build contracts for work within the city where a higher degree of control is necessary to ensure what is built reflects the plans that the public has been involved with creating.
  - We encourage NYSDOT to more closely examine proposed detour routes and the lengths of times they will be in place, as these routes will likely impact environmental justice communities, especially routes proposed for use by construction vehicles.
  - We encourage NYSDOT to work with other state agencies to make I-90 toll free through Syracuse during construction of the project to encourage drivers to use this alternate route.

- **Redevelopment Opportunity Adjacent to Onondaga Creek -** There appears to be a sizeable piece of right of way freed up on the west side of Onondaga Creek when the West St./I-690 interchange is brought to grade and the Herald Place exit ramp is removed. The proposed change to this area creates approximately 0.75 acres of useable land where the Herald Place exit ramp will be removed. The current plan for this land is to create a short two block section of the Creekwalk to the west side of the creek. As this is an important section of the Creekwalk, coupled with the strong desire to increase property tax and build new opportunities for businesses and residents of the city, this area would benefit greatly from a comprehensive

development plan for this corner of downtown to determine its best use (outlined in red shown here).

- **Wilson Park -** While there have been some modifications to the construction plans and the impacts on Wilson Park, we encourage NYSDOT to continue to refine its approach at this site. More consideration should be made for users of the park, particularly youth, given its proximity to the major construction taking place to remove the viaduct and rebuild Almond Street as the Business Loop. Alternative solutions that incorporate improvements to nearby park properties prior to construction could yield a better outcome for local residents over both the short- and long-terms.

- **Design Details**
  - Monroe and Madison intersections are not complete intersections and therefore do not provide accommodations for pedestrians to cross Almond Street. Given the experience along West Street (that eventually resulted the installation of a pedestrian-activated traffic signal), it is unclear how NYSDOT is planning to deter pedestrians from trying to cross at these locations. This is of particular concern at Monroe, which is in a more residential part of the Business Loop / Almond Street corridor.
  - We encourage NYSDOT to install leading pedestrian interval (LPI) signals to give pedestrians the ability to cross slightly before vehicles are given the green to better balance vehicular, bicycle, and pedestrian transportation.

- **Consolidated Traffic Center -** We recommend that NYSDOT use this opportunity to pursue a consolidated regional transportation operations center, as has been successfully developed in Monroe County. This is particularly relevant considering the many "smart city" advances that have been introduced as part of the Syracuse Surge initiative. The Center could serve as an anchor tenant within the city. We recommend the Center be tasked with launching efforts toward a coordinated county/city signal system, which would improve efficiency of traffic movement throughout the Community Grid corridor and the county.

- **CenterState CEO Partner Recommendations -** CenterState CEO has worked closely with its partners and affiliates throughout this process, including the Downtown Committee of Syracuse, the Upstate Minority Economic Alliance and property owners from both the Northside and the Southside of the city. We support the recommendations of these groups, which address more detailed comments with respect to their constituencies.

March for Justice I-81 Public Comment Submission

Lanessa Chaplin <lchaplin@nyclu.org>

Mon 9/27/2021 1:26 PM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Good Afternoon,

Please accept this submission as group-coalition public comment as part of the NEPA public comment participation period. This public comment is a reflection of the March for Justice on I-81. The March had over 140 attendees and several organizations that sponsored and support the March for Justice I-81 demands.

Best,

Lanessa L. Owens- Chaplin, Esq.
Project Counsel
New York Civil Liberties Union
Central New York Chapter
499 S. Warren Street Suite 430
Syracuse, NY 13202
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Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Attn: Mark Frechette and Rick Marquise

First, thanks for your leadership and dedication to the preferred option the Community Grid. As a coalition of organizations, we continue to believe based on our independent research, community outreach and the analysis of the 2021 Draft Environmental Impact Statement ("DEIS") the community grid is the best option for the Central New York region.

However, improvements to the DEIS to achieve economic, racial and environmental justice as directed by the Biden Administration and Secretary of U.S Department of Transportation are needed. As a result, over 20 organizations came together on August 14, to march for "Justice on I-81". The March was centered on three principles:

(1) Environmental Justice- Give us Clean Air, and what that means is, move the highway's proposed on/off ramp (roundabout) at least 600 feet away from the Dr. King elementary school. A predominately Black, persistently struggling, and economically disadvantaged school that is over-exposed to air pollution from theI-81 highway. While we recognize the benefits generally for a roundabout as a best way to calm traffic, the placement of the roundabout is a major concern. Research on the impacts of air pollution on school-aged children, specifically from vehicle pollution is well-documented. For example, the EPA's "Best Practices for Reducing Near-Road Pollution" report, the Centers for Disease Control's "Ventilation in Schools and Childcare Programs" and many other well-researched articles outline the negative impacts to schools that are within 500-600 feet of a major roadway – "major roadway" defined as 30,000 cars or more per day. The NYSDOT DEIS Appendix M-5, R 4-14 (page 79) estimates 38,000 per day will travel along the roundabout. We have taken a strong position against this design element and the NYCLU also co-authored the SIGH Act to stop NYSDOT from placing major roadways within 600 feet of schools and to mitigate in places where this already exists- something that 32 other states already regulate through legislation. In addition, the New York Civil Liberties Union has provided a detailed explanation in the "Building a Better Future Report" for moving the roundabout.

(2) Racial Justice- Give us the Land- this is our restorative justice work. The original build of the I-81 Viaduct destroyed a Black community by placing a highway through their neighborhood. The construction of this portion of I-81 razed 500 homes and business displacing over 3,000 people from their community. We appreciate that the NYSDOT has made substantial changes to their assessment of future land use found at Section 6-3-2 on page 6-1666 and in Appendix M-5 in R 5-8 on page 92 with the creation of a community land use group. However, we would like the DEIS to go further and make the sale or transfer of the almost 10 acres of land contingent upon the land being placed in a land trust for the impacted community. The DEIS must include language to return the land to impacted environmental justice communities, through a community land trust. The community land trust will prevent displacement, create a more equitable integration plan, and gives the community a way to build equity, increase property values and in return increase resources to a severely under-resourced neighborhood, to benefit the residents in that specific community.

(3) Economic Justice- Give us Jobs- On a very basic level- give jobs to the community that is economically disadvantaged. The NYSDOT WorkSmart NY Training Program has no direct pathway to employment. The NYSDOT needs to take the lead on preparing workers for the construction project, create direct hire programs, and require all contractors to reserve a fair percentage of the construction workhours to local Syracuse residents, with specific attention to the Black community living in the shadows of the viaduct. For example, the Syracuse Build Apprenticeship Program opened a pilot training program with 20 slots and over 367 Syracuse residents applied. That is a demonstration that Syracuse residents are eager and ready to work. The I-81 redevelopment project is a 2-Billion-dollar project that is estimated to take 6 years. That is 6 years of good quality jobs that gives an unemployed, or underemployed person, a steady income and lifelong skills in trades. The NYSDOT has verbally indicated they intend on applying for the SEP 14- the local hiring pilot program re-initiated by the Biden administration that allow a percentage of contractors and employees to be local as defined by NYSDOT. The push here is to define local not by the larger Central New York region- but by the Syracuse City limits with a particular focus on impacted frontline community members who have been historically left out of the trade's work. The need for this definition is defined in the Urban Jobs Task Force Racial Equity Impact Statement. In addition to requesting the NYSDOT apply for the SEP 14 local hiring pilot program, limiting local hire to Syracuse residents, we are requesting the NYSDOT set inclusive local hiring goals through community workforce agreements. Additionally, we are requesting monitoring of these goals through an independent compliance officer to ensure transparency, and accountability to compliance. Finally, the current percentage of DBE for this project is only 6%, that is not an adequate percentage to ensure disadvantages business in the footprint of this project receive an adequate flow of benefits to the community that will suffer the greatest burden.

The march was a physical representation of those three principles and work. The march had over 150 attendees. There was participation on every level. At least, 25 school-aged children, impacted residents, suburban residents, elected officials and our oldest marcher was 82 years old. In attendance was 5 local press outlets- with two following the march. Speakers included local impacted residents, elected officials, and community partners. The March was covered by several media outlets including Spectrum News, local SYR, and Post-Standard, MySouthSide, and The Daily Orange.

NYCLU

UNITED FOR ECONOMIC JUSTICE
URBAN JOBS TASK FORCE

1199SEIU
United Healthcare Workers East

PEACE INC
EMPOWERING PEOPLE TO THRIVE | EST. 1968

AGREE New York
Alliance for a Green Economy

CNY FAIR HOUSING

SYRACUSE TENANTS UNION

Syracuse New American Forum NAF

Planned Parenthood®
Care. No matter what.
Planned Parenthood of Central and Western New York

CENTER FOR COMMUNITY ALTERNATIVES

7EVEN STREAMS LLC

Families for Lead Freedom Now!

WORKERS CENTER
CENTRAL NEW YORK

SPAARC
SYRACUSE POLICE ACCOUNTABILITY & REFORM COALITION

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE
NAACP
FOUNDED 1909

Charter
COMMUNICATIONS

October 8, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation,
Region 3
333 East Washington Street
Syracuse, New York 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
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Albany, New York 12207

Re: *Charter Communication Comments on the Interstate 81 Viaduct Project Draft Design Report/Draft Environmental Impact Statement/Draft Section 4(f) Evaluation*

Dear Mr. Frechette and Mr. Marquis:

This letter represents Charter Communications' (Charter) comments on the above referenced document which was released for public review and comment on July 16, 2021. Charter reserves the right to submit additional comments up until October 14, 2021, the currently scheduled closing of the public comment period.

In addition to the structural deficiencies to be addressed by the Interstate-81 project, Charter supports the State's mission to correct historical social injustices created when the interstate was first constructed. For decades, those living in the predominantly minority communities near the interstate in Syracuse have had their health and quality of life negatively impacted. Charter believes the safety and well-being of these residents is paramount in moving this project forward.

At Charter, we are passionate about making a positive impact and giving back to the communities where our employees and customers live and work. Charter's workforce includes over 10,000 people in New York. In 2020 alone, Charter extended its network to reach approximately 130,000 new homes and small businesses, and we serve over 1,100 communities across the state under the brand name Spectrum. Charter also supports organizations through the company's national community philanthropic program, Spectrum Employee Community Grants; Spectrum Digital Education grants to support digital literacy in communities across our footprint; and various other initiatives that support critical services not-for-profit organizations provide to our communities. We are confident our investments in our employees and community, along with our continued partnerships with organizations in the City of Syracuse and the State, will further support advocacy efforts in these communities.

<u>Background and Anticipated Impacts to Charter's Property at 815 Erie Blvd. East, Syracuse, NY</u>

In 2001, Charter acquired the building and associated parking lots at 815 Erie Boulevard East in Syracuse. Although abandoned at the time, Charter invested $6 million to restore the former transportation station building. We adapted its interior for our business needs, comprised of a news

studio and operations, offices and a retail/mobile store, while retaining much of the historic character. The building was added to the National Register of Historic Places on November 11, 2009.

This location accommodates approximately 109 employees. In order to accommodate employee and customer parking needs, Charter spent approximately an additional $525,000 in 2014-2015 to expand the parking lot to the east of the existing parking lot. Charter operates a number of business functions from this location. This location is Spectrum News' primary operation center for Central New York, where they provide 24/7 news, sports, and weather coverage along with other public affairs programming. Spectrum Reach, the most trusted media partner in America, and our local advertising experts who help grow local businesses are also located at this location and host clients regularly. Our Retail Mobile store at this location is the highest volume store in the Northeast and provides an invaluable service to the community to address their service needs from providing equipment, paying bills, and offering a location for a community who prefer an in person experience. In addition, we also manage and support the Public, Educational and Government (PEG) Access Channel Studio for the City of Syracuse at this location. Members of the public come to this location to film, edit and create content, primarily centered around community interests, for the PEG channel.

The preliminary Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) identified a preferred alternative, known as "the Community Grid Option" which involves demolition of the elevated section of the highway, replacing it with a street level boulevard. The Community Grid Option would affect Charter's property on Erie Boulevard East, as it is adjacent to Interstate 690 (I-690). The Community Grid Option proposes to construct a new ramp connecting Irving Avenue with I-690, requiring the acquisition of 0.46 acres of the parking lot east of the building.

While the DDR/DEIS indicates that there will be no physical acquisition of any portion of our building, we have a number of concerns and questions about impacts to the property and our operations, as detailed below. Parking for employees and customers, as well as their safety, will be a significant concern both during construction and after completion, as this retail store is the highest volume store in the Northeast. Additional primary concerns include to what extent our existing property is impacted by proposed easements and potential access rights, the impact on our on-air news production during construction, how utility infrastructure needs including potential fiber relocations will impact our ability to provide services to current and future subscribers during and after construction, as well as driveway use and parking loss and potential impediments.

<u>Comment 1. Highway Boundary Lines & Impact to Charter's Erie Boulevard Property</u>

From the plans available to the public, it appears that the proposed highway boundary extends into the back side of the existing building. The proposed easement area off of I-690 would extend over the roof of Charter's building. (For convenience, a reference map has been included herein. The map was extracted from the project DDR/DEIS, and includes overlays and references identifying Charter's concerns.)

The DDR/DEIS is unclear as to the following issues:

a. What is NYSDOT's intention for the proposed highway boundary line at this location? Will the current retaining wall be removed?

b. Why is this area included within the easement/for what purpose? Is the intent just the roof area for something overhead or will Charter lose access to the area underneath?

Comment 2. Transformer & Utility Pole Relocation

The existing transformer and corresponding utility pole providing electricity to our building and fiber connectivity for our network is located in the middle of the proposed off-ramp.

The DDR/DEIS is unclear regarding responsibility for relocation of the transformer and utility pole.

a. Can NYSDOT confirm that it is working with the electric provider to relocate this transformer & utility pole?

b. As this is a NYSDOT project, can NYSDOT confirm that the costs to move any infrastructure currently serving Charter's building would be borne by the state?

c. Are plans in place to avoid interruption of service while the transformer and utility pole are relocated?

Comment 3. Noise, Vibration and Dust Impacts to Spectrum News Studio Operations

Any traffic noise, construction noise or vibrations that are able to penetrate the building's envelope would impact Spectrum News on air presence, especially any pounding of steel support structure into the ground or construction equipment with loud beeping enunciators.

a. Given the nature and necessity of reporting the News, does the state have plans to mitigate noise and vibrations during construction and impacts of highway traffic noise once construction is completed?

b. What air pollution/dust mitigation measures will be in place during construction?

    i. Construction dust would have an impact on the buildings HVAC systems and rooftop air filter, requiring constant filter changes. Any blockage could cause equipment failure affecting our local news operation and taking out our channel to customers. An operational HVAC system is mandatory in order to keep Spectrum News technical equipment operating.

c. Would the State be willing to create a construction schedule to accommodate our news and other studio productions to mitigate noise and vibration impacts?

   i. Our Spectrum News editorial and technical staff begin their day prepping the Morning Show at approximately 4:45am. Studio production for the Morning Show begins at 5:30am and concludes at 9am. Studio Anchor Segments are often updated for repeated telecast between the hours of 9am and noon. Between the hours of noon and 5:30pm there is no studio production.
   ii. At 5:30pm studio production resumes for evening Sports programs.

Comment 4: Parking During and After Project Completion

Please note the following:

- **Current number of spaces**: 134
- **Spaces being directly eliminated**: at least 62
- **Spaces available once project is complete**: No more than 72

The number of parking spaces impacted by this project is a significant concern. The number of parking spaces available during construction and after project completion will have a direct impact on what departments and types of services Charter will be able to provide from this location.

Under the current proposal, at least 62 spaces will be directly eliminated, and more may be lost to accommodate traffic circulation after the project is completed. This will result in a building with seriously inadequate parking, thus diminishing the value of the property and potentially creating a non-conforming asset under the City of Syracuse code.

The building currently houses 109 employees, requiring 109 parking spaces for their use alone. Additional parking is required for visitors to Spectrum News, Reach and PEG, as well as for the customers that visit the Spectrum Retail store in the building. Even with the current 134 spaces, the parking area is already at or over capacity on a busy day. During peak times, all of the 25 non-employee spaces are occupied just for the customer transactions at the retail store.

The reduced parking that will result from the project as proposed will create business problems and safety hazards because employees, visitors and retail customers will not be able to find a place to park. But a permanent reduction in parking will also make the property unmarketable. Potential buyers will not want a building that does not have sufficient parking to support full occupancy by employees and tenants and no room for visitors and customers. Further, lack of parking spaces could potentially make the building non-conforming under the zoning code.

a. Given the permanent impact of this project on parking for employees, visitors and customers, please consider measures to mitigate the loss of parking, including possible modifications to the current design.

i. For example, once the project is complete, would Charter be able to utilize the space underneath the off/on ramps for parking or will the ramps be too close to ground level to allow for this?
ii. If there is clearance for parking under the current design, does the state have an indication if this area will be used for anything else? Approximately how many parking spaces will be available?
iii. Could the ramp remain elevated for a greater length than currently designed to save more parking?
iv. Can the ramp be redesigned and built closer to Canal Street, to avoid dividing Charter's current parking lot?

v. The building by Canal Street is currently for sale. Would the State consider acquiring that property to place the ramp in that location?

b. The design should include measures to allow for safe pedestrian crossing of Erie Boulevard – such as an elevated walking bridge -- for employees, visitors and customers that need to find parking across the street due to permanent loss of parking at our property.

Comment 5: Driveway Easements

Two of the three existing driveways (the two closest to the proposed ramp) will be subject to temporary easements during construction and it appears that one of those will be permanently lost because of its proximity to the highway ramp. A site plan of the property is enclosed for reference. We operate a heavily visited retail store at this location which requires employee, visitor and customer parking by as many as 134 vehicles at a time, and must provide for traffic circulation and safe entry into our building. If the two driveways are inaccessible during construction, all traffic will have to enter and exit through the third driveway, making traffic circulation, ingress and egress difficult and potentially dangerous.

a. What are NYSDOT's intentions and needs for these easements? Are the temporary easements for ingress/egress of construction vehicles only or will there be times that equipment, supplies or materials will be staged within the easements, preventing access by employees, visitors and customers?

b. Would it be possible to limit this easement to one driveway?

Comment 6: Temporary Easement within Parking Lot

As previously stated, this location includes a very busy Spectrum mobile retail store. Considering customer accessibility and safety, please identify:

a. What is NYSDOT's intent for a temporary easement within the parking lot, adjacent to the proposed off-ramp?

b. Will this area be utilized for staging/storage? If so, how long will this space be occupied for these purposes? Would it be possible for the NYSDOT to use the parking lot to the East side of the proposed ramp?

c. Will NYSDOT return the parking lot and entrances to new (original) condition if disturbed?

Comment 7: Parking Spaces near Canal Street

It appears that the space near Canal Street on the east side of the off/on ramps will be inaccessible and our property will essentially be split by the off ramp.

a. Can you confirm that our understanding is accurate?

b. If so, splitting the lot will render a portion inaccessible except for Canal Street, which poses safety concerns for employees and customers to cross this area to reach our location.

Comment 8: Fiber and Pole Relocations

Charter is a leading connectivity company and cable operator providing superior broadband, voice, video, and mobile services. Our top priority is meeting customer needs with superior projects and services. It appears that the I-81 project will require relocation of Charter's fiber facilities and possible pole relocations at several locations other than the Erie Boulevard property. What plans are in place to ensure that the relocation of these facilities will not result in an interruption of service to our customers?

Thank you for your consideration of the above comments. Should you have any questions or comments on these comments, please contact:

Jill Luther, Sr. Director, Government Affairs
Charter Communications
6005 Fair Lakes Rd
East Syracuse, NY 13057
315.842.2492
Jill.Luther@charter.com

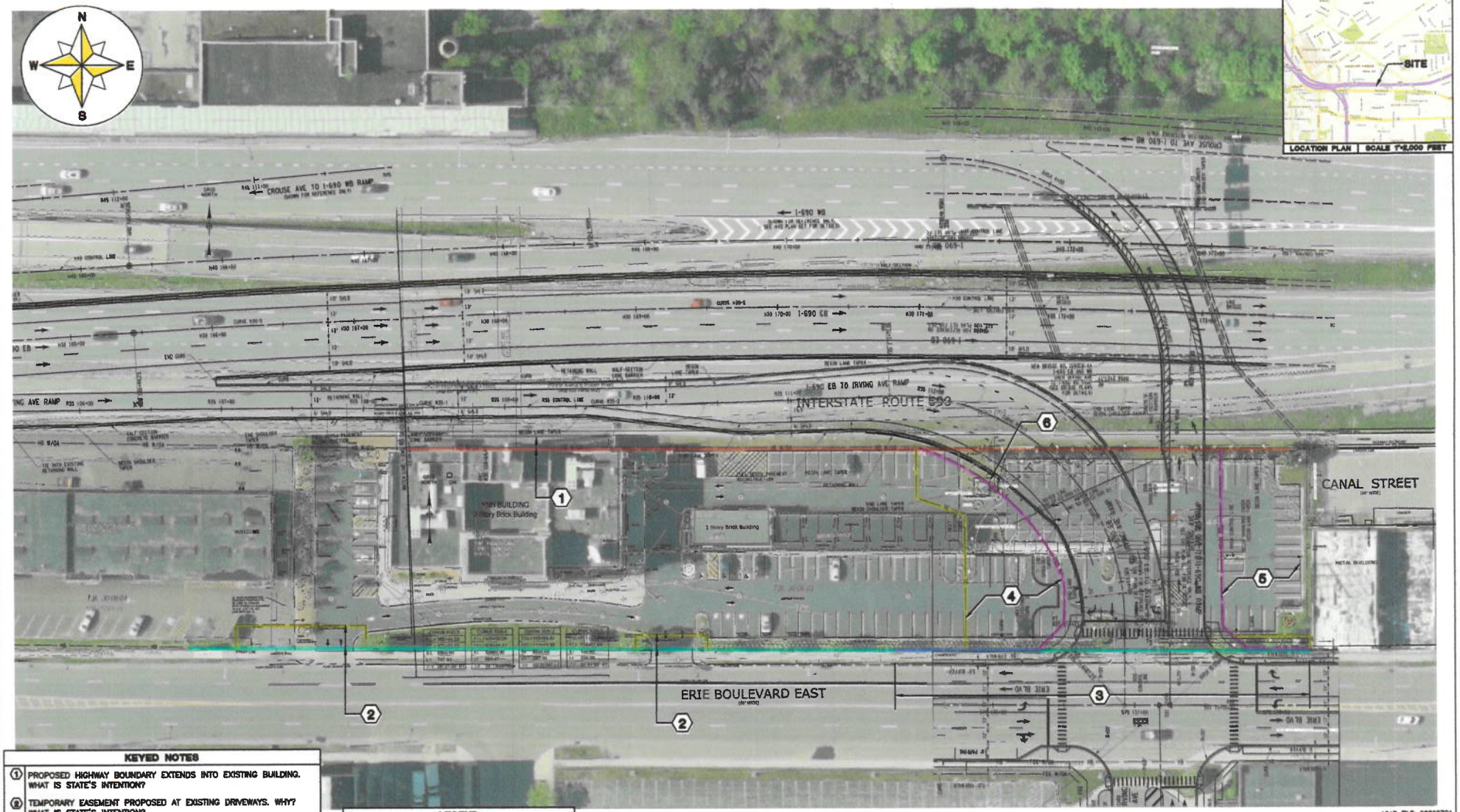
We look forward to NYSDOT's response.

Very truly yours,

Camille Joseph-Goldman
Group Vice President, Government Affairs
Charter Communications

Enclosures:
Site Plan
I-81 Overlay Exhibit

cc:
Jill Nelson, VP, Senior Counsel - Real Estate, Charter Communications
Alice Kim, Director - Government Affairs, Charter Communications
Mark Meyerhofer, Sr. Director - Government Affairs, Charter Communications
Jill Luther, Sr. Director – Government Affairs, Charter Communications
Michael Reid, SVP - Corporate Services, Charter Communications
Kevin G. Roe, Barclay Damon, LLP



KEYED NOTES

1. PROPOSED HIGHWAY BOUNDARY EXTENDS INTO EXISTING BUILDING. WHAT IS STATE'S INTENTION?
2. TEMPORARY EASEMENT PROPOSED AT EXISTING DRIVEWAYS. WHY? WHAT IS STATE'S INTENTION?
3. PROPOSED HIGHWAY BOUNDARY (WITHOUT ACCESS).
4. WHAT IS STATE'S INTENT FOR THIS TEMPORARY EASEMENT? STAGING/STORAGE ONLY? WILL STATE RETURN PARKING AREA TO NEW CONDITION IF DISTURBED?
5. THIS AREA IS RENDERED USELESS FOR PARKING WITHOUT ACCESS TO ERIE BLVD.
6. POSSIBLE CONFLICT WITH TRANSFORMER PAD.

LEGEND

- PROPOSED HIGHWAY BOUNDARY
- PROPOSED HIGHWAY BOUNDARY WITHOUT ACCESS
- PROPOSED FEE ACQUISITION WITHOUT ACCESS
- PROPOSED TEMPORARY EASEMENT

NOTE: THIS PLAN WOULD ELIMINATE APPROXIMATELY 62 PARKING SPACES.

PLAN
Scale: 1"=30'
30 0 30 60

REVISIONS

No.	Date	Description	By

Seal

L.J.R. Engineering, P.C.
ELTA Business Park
5304 ELTA Drive
Cicero, New York 13039
Phone 315-699-9033 Fax 315-699-9042

Project: SPECTRUM SITE
615 ERIE BLVD EAST
CITY OF SYRACUSE — ONONDAGA COUNTY N.Y.

Sheet Title: I-81 TAKING EXHIBIT

ACAD FILE: 982007C1

Date	FEBRUARY 25, 2021
Drawn By	S.R.M.
Checked By	A.J.W., P.E.
Job No.	982.007
Scale	AS SHOWN
Sheet No.	1
Sheet	1 of 1

SOIL TEST RESULTS

LOCATION NUMBER	APPROXIMATE ELEVATION	RATE OF INFILTRATION	SOIL PROFILE
PT-1	552.3'	2 MINUTES/INCH	0'-6"-TOPSOIL 1'-48"-STONE, MISC. BUILDING RUBBLE
PT-2	560.1'	5 MINUTES/INCH	0'-6"-TOPSOIL 6"-66"-STONE, MISC. RUBBLE, CINDER BLOCKS AT 35"
DH-1	560.1'	N/A	0'-12" - TOPSOIL 12"-24"-ASPHALT LAYER/STONE 24"-LAYER OF GEOFABRIC 24"-48"-#2 CRUSHED STONE 48"-LAYER OF GEOFABRIC 24"-72"-#2 CRUSHED STONE

CONDUCTED SEPT. 18, 2014 BY RZ ENGINEERING AT A DEPTH OF 60 INCHES BELOW EXISTING GRADE.

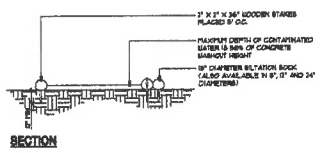
LEGEND

EXISTING	PROPOSED	DESCRIPTION
4377.7		CONTOUR
	TC/BC	SPOT ELEVATION
	HP/LP	TOP/BOTTOM OF CURB
		HIGH / LOW POINT
		UTILITY POLE
		WATER LINE
		FIRE HYDRANT
	ST	STORM PIPE
		SANITARY PIPE
		OVERHEAD ELECTRIC
		GAS
CB		CATCH BASIN
CO		CLEAN OUT
SMH		SANITARY MANHOLE
		ASPHALT PARKING PAVEMENT
		TRAFFIC SIGN
		LIGHT POLE (SEE ELECTRICAL PLANS FOR WIRING)
		CURB
	SF	SILT FENCE
		TREE
		SHRUB
		VEGETATION
	QUANTITY PLANT TYPE	PLANT KEY

EXISTING CONDITIONS & REMOVAL/DEMOLITION NOTES

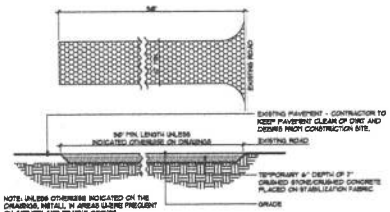
CONTRACT LIMIT LINE

1. SAWCUT ASPHALT PAVEMENT IN NEAT STRAIGHT LINE.
2. REMOVE EXISTING ASPHALT PAVEMENT.
3. REMOVE EXISTING CONCRETE CURB TO NEAREST JOINT.
4. REMOVE EXISTING VEGETATION IN ITS ENTIRETY, INCLUDING STUMPS AND ROOTS. DISPOSE OF MATERIALS OFF SITE.
5. TERMINATE ELECTRIC SERVICE TO EXISTING LIGHT POLES. REMOVE EXISTING LIGHT POLE INCLUDING CONCRETE BASE. DELIVER LIGHT POLE TO OWNER. DISPOSE OF CONCRETE BASE OFF SITE.
6. BICYCLE RACK- DOUNTOUN RACK, AS MANUFACTURED BY DERO (1-888-337-6726). PROVIDE (4) SURFACE MOUNTS PER MANUFACTURER RECOMMENDATION, COLOR PER OWNER. SURFACE MOUNT BICYCLE RACK FOOTING PER DERO MANUFACTURER SPECIFICATIONS.
7. AREA WHERE NEW PARKING LOT WILL BE CONSTRUCTED WAS A FORMER BUS PARKING AREA IN THE PAST. CONTRACTOR SHOULD EXPECT TO ENCOUNTER A FAIRLY THIN LAYER OF ASPHALT PAVEMENT, WITH LAYERS OF SUBBASE MATERIAL AND 'S' STONE BELOW IT. THE ASPHALT PAVEMENT IS APPROXIMATELY 12-INCHES BELOW THE EXISTING LAWN ELEVATION. CONTRACTOR TO INCLUDE IN THEIR BID THE COST TO REMOVE ANY ASPHALT PAVEMENT WHERE IT IS ENCOUNTERED WITHIN THE PROPOSED PAVEMENT LIMITS BUT ANY STONE SURFACING BELOW THE ASPHALT PAVEMENT LAYER MAY REMAIN. CONTRACTOR CAN DIG TEST HOLES ON THE SITE, WITH OWNER PERMISSION, DURING PREPARATION OF THE CONSTRUCTION BID TO CONFIRM ASPHALT PAVEMENT ELEVATIONS.
8. CAREFULLY DISCONNECT EXISTING IRRIGATION SYSTEM. EXTENT OF EXISTING IRRIGATION SYSTEM NEEDS TO BE CONFIRMED. IRRIGATION SYSTEM MAY BE ENCOUNTERED DURING SITE EXCAVATION. NEW IRRIGATION SYSTEM TO BE INSTALLED UNDER SEPARATE CONTRACT. COORDINATE.
9. REMOVE EXISTING CHAIN LINK FENCE INCLUDING FOOTINGS AND DISPOSE OF OFF SITE. BACK FILL FOOTING HOLES WITH COMPACTED COARSE AGGREGATE, FILL WITH 4" MINIMUM TOPSOIL AT TOP OF HOLE.
10. REMOVE EXISTING SATELLITE EQUIPMENT AND CONCRETE PADDING AND DISPOSE OF OFF SITE.
11. REMOVE EXISTING CONCRETE PAVEMENT TO NEAREST SCORE JOINT AND DISPOSE OF OFF SITE.
12. EXISTING ASPHALT PAVEMENT REMAINS. PREPARE FOR ASPHALT OVERLAY.
13. EXISTING TREE REMAINS. PROTECT.



NOTES:
1. INSTALL ON FLAT GRADE FOR OPTIMUM PERFORMANCE.
2. CONCRETE WASHOUT MAY BE STACKED IN A PYRAMIDAL CONFIGURATION FOR ADDED HEIGHT AND STABILITY.
3. CONCRETE WASHOUT MAY BE DIRECT SEEDED AT THE TIME OF INSTALLATION.

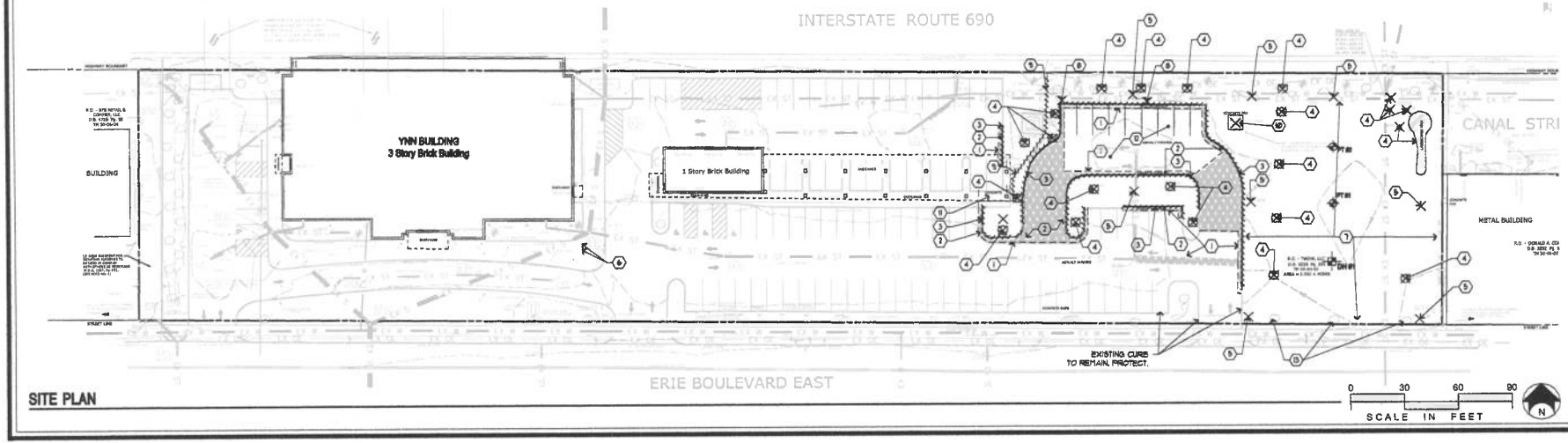
2 L1.0 SILTATION SOCK CONCRETE WASHOUT
NOT TO SCALE 84-820140



NOTE: UNLESS OTHERWISE INDICATED ON THE DRAWINGS, INSTALL IN AREAS WHERE FREQUENT ON-SITE/OFF-SITE TRAFFIC OCCURS

NOTES:
1. SIXTH-TWELVE (12) FOOT MINIMUM, BUT NOT LESS THAN THE FULL WIDTH AT POINTS WHERE INGRESS OR EGRESS OCCURS. TWENTY-NINE (24) FOOT IF SINGLE ENTRANCE TO SITE.
2. FILTER CLOTH WILL BE PLACED OVER THE ENTIRE AREA PRIOR TO PLACING OF STONE.
3. SURFACE WATER-ALL SURFACE WATER FLOWING OR DIVERTED TOWARD CONSTRUCTION ENTRANCES SHALL BE PIPED ACROSS THE ENTRANCE. IF PIPING IS IMPRACTICAL, A MOUNTABLE BERM WITH 5:1 SLOPES WILL BE PERMITTED.
4. MAINTENANCE-THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION WHICH WILL PREVENT TRACKING OR FLOWING OF SEDIMENT ONTO PUBLIC RIGHT-OF-WAY. WHEN WASHING IS REQUIRED, IT SHALL BE DONE ON AN AREA STABILIZED WITH STONE AND WHICH DRAINS INTO AN APPROVED SEDIMENT TRAPPING DEVICE.
5. PERIODIC INSPECTION AND NEEDED MAINTENANCE SHALL BE PROVIDED AFTER EACH RAIN.
6. REFER TO SWPPP, SECTION 7 FOR NYS STANDARDS AND SPECIFICATIONS FOR STABILIZED CONSTRUCTION ENTRANCE.

1 L1.0 CONSTRUCTION ENTRANCE (MUDRACK)
NOT TO SCALE 84-820144



SITE PLAN

KEPLINGER FREEMAN ASSOCIATES
LANDSCAPE ARCHITECTURE & LAND PLANNING
KZ Engineering, PLLC

Client:

Contact:

YNN PARKING EXPANSION
815 ERIE BLVD EAST
CITY OF SYRACUSE, NY

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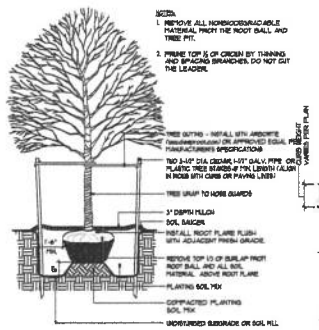
Drawn By: LMM
Checked By: DMK
KFA Proj. No.: 33038
Date: September 30, 2014
Scale: AS NOTED

Title:

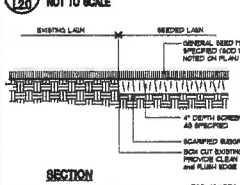
SITE PREPARATION PLAN

L1.0



SECTION

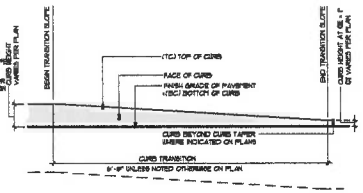
12 L2.0 TREE PLANTING
NOT TO SCALE 33-8800-01



SECTION

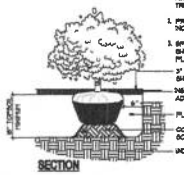
11 L2.0 SEEDED LAWN
NOT TO SCALE 33-8800-09A

FOR SLOPES LESS THAN 1V:4H AS INDICATED ON PLANS



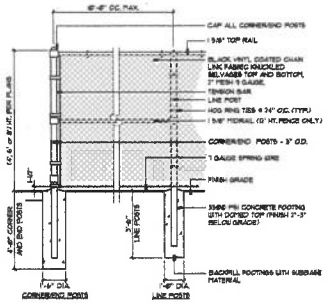
ELEVATION

10 L2.0 CURB ENDING/TAPER (CE/CT)
NOT TO SCALE 33-8800-07



SECTION

9 L2.0 SHRUB PLANTING
NOT TO SCALE 33-8800-02



POST SCHEDULE		
FABRIC HEIGHT	LINE POST O.D.	END / CORNER POST O.D.
4'	2"	2 1/2"
6'	2 1/2"	3"
8'	3"	3 1/2"
10'	4"	4 1/2"

NOTES:
1. HOLD TOP OF FOOTING AT ASPHALT BINDER SUBGRADE WHEN O.C. FENCE FOOTINGS ARE LOCATED IN ASPHALT PAVEMENT.

SECTION

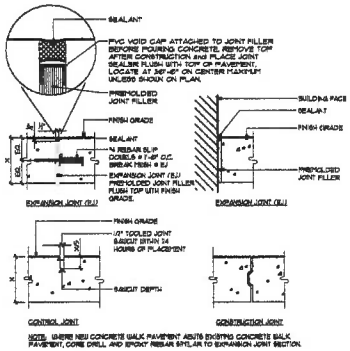
8 L2.0 CHAIN LINK FENCE - VINYL CLAD
NOT TO SCALE 33-3113-09

PLANT LIST

KEY	COMMON NAME	BOTANICAL NAME	CALIPER	HEIGHT	CONDITION
TREES					
Py	REDSPIRE PEAR	PYRUS CALLERYANA 'REDSPIRE'	2"	-	-
Mvp	VELVET PILLAR CRABAPPLE	MALUS 'VELVET PILLAR'	15" CAL.	-	B&B
SHRUBS					
Li	PRIVET HEDGE	LIGUSTRUM ISOLUM	-	24" - 36"	3 GAL.

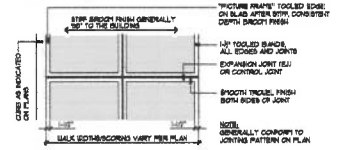
PLANT NOTES

⚠ 3" DEPTH SHREDDED BARK MULCH WITH 18" OF SCREENED TOPSOIL.



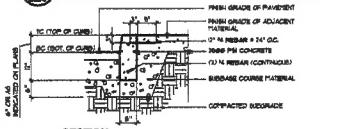
SECTION

7 L2.0 CONCRETE JOINT DETAILS
NOT TO SCALE 33-8800-04



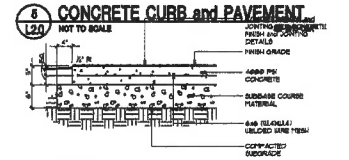
PLAN

6 L2.0 CONCRETE FINISH
NOT TO SCALE 33-8800-05



SECTION

5 L2.0 CONCRETE CURB and PAVEMENT
NOT TO SCALE

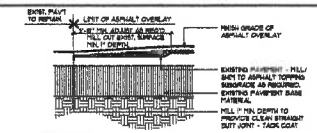


SECTION

4 L2.0 CONCRETE PAVEMENT
NOT TO SCALE 33-1613-01

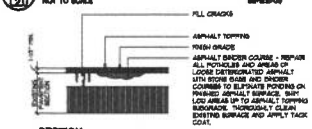
LAYOUT CONSTRUCTION NOTES

1. MEET LINE AND GRADE.
2. 4" WIDE YELLOW PAINTED LINES, (TYP.).
3. ASPHALT PAVEMENT - PARKING PER DETAIL 1/L2.0.
4. CONCRETE CURB PER DETAIL 5/L2.0.
5. SEEDED LAWN PER DETAIL 11/L2.0.
6. LIGHT POLE BASE PER DETAILS 1/L5.0 AND 2/L5.0. REFER TO SITE LIGHTING PLAN FOR ADDITIONAL INFORMATION.
7. MEET TOP AND FACE OF EXISTING CURB.
8. CONCRETE WALK PAVEMENT, REFER TO DETAIL 4/L2.0, 5/L2.0 AND 7/L2.0.
9. 8' HEIGHT BLACK VINYL COATED CHAIN LINK FENCE PER DETAIL 8/L2.0.
10. CANTILEVER SLIDE GATE PER DETAIL.
11. 6" WIDE YELLOW PAINT LINE @ 24" @ 45 DEGREES.
12. CURB ENDING/TAPER PER DETAIL 10/L2.0
13. ASPHALT OVERLAY AND TRANSITION PER DETAIL 2/L2.0 AND 3/L2.0.
14. INSTALL CHAIN LINK FENCE ADJACENT TO SLIDE GATE TO PROTECT ALL MOVING GATE PARTS AND HARDWARE. SOME FIELD ADJUSTMENT OF FENCE LAYOUT MAY BE REQUIRED.
15. SLIDE GATE SAFETY LOOP LOCATION FOR COORDINATION PURPOSES ONLY. REFER TO MANUFACTURER FOR INSTALLATION SPECIFICATIONS.
16. SLIDE GATE EXIT LOOP LOCATION FOR COORDINATION PURPOSES ONLY. REFER TO MANUFACTURER FOR INSTALLATION SPECIFICATIONS.
17. SLIDE GATE CARD READER/GATE OPENER LOCATION FOR COORDINATION PURPOSES ONLY. REFER TO MANUFACTURER FOR INSTALLATION SPECIFICATIONS.
18. INSTALL 14' DOUBLE SWING GATE PER DETAIL 2/L3.1. PROVIDE KNOX BOX FOR FIRE DEPARTMENT ACCESS.
19. PROVIDE TWO (2) APPARATUS BUMPER COLLAPSIBLE BOLLARDS, MODEL - MAXFORCE COLLAPSIBLE BOLLARD, WRENCH OPERATED UNIT W/ P-181 STANDARD 5-SIDED AWWA HYDRANT NUT W/ 1-1/8" FACE, AS MANUFACTURED BY BLUE EMBER TECHNOLOGIES, LLC. COLOR: FOREST GREEN.



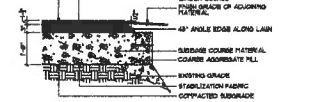
SECTION

3 L2.0 ASPHALT OVERLAY TRANSITION
NOT TO SCALE 33-1613-09



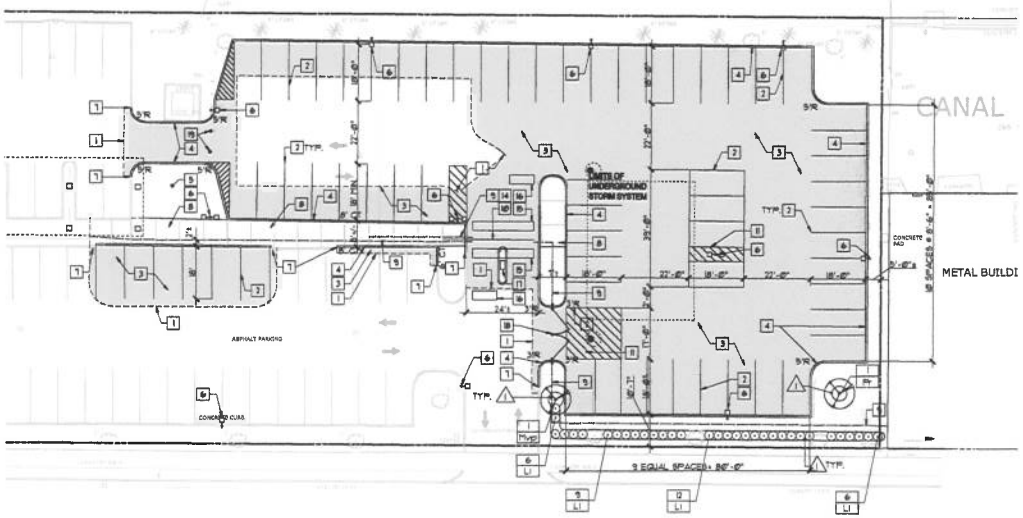
SECTION

2 L2.0 ASPHALT OVERLAY
NOT TO SCALE 33-1613-07



SECTION

1 L2.0 ASPHALT PAVEMENT - PARKING
NOT TO SCALE 33-1613-06



LAYOUT and PLANTING PLAN

SCALE IN FEET 0 20 40 60

N

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YNN PARKING EXPANSION

815 ERIE BLVD EAST
CITY OF SYRACUSE, NY

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2	04/20/2015	GEN. REV.
3	02/09/2016	GEN. REV.
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5	05/16/2016	GEN. REV.

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KFA Proj. No.:	33605
Date:	September 30, 2014
Scale:	AS NOTED

Title:

LAYOUT and PLANTING PLAN

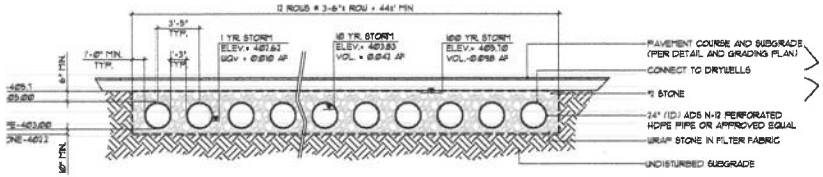
L2.0

GRADING, DRAINAGE & UTILITY GENERAL NOTES

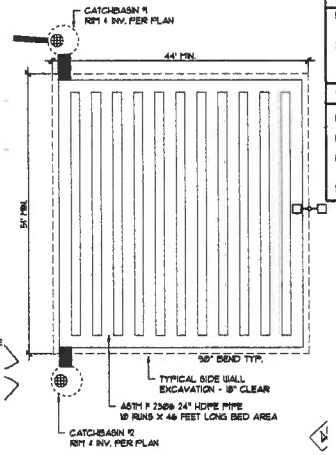
1. ANY/ALL FILL REQUIRED BELOW PAVING SUBGRADE SHALL ONLY BE COARSE AGGREGATE FILL OR SUBBASE COURSE MATERIALS.
2. WHEREVER EXISTING STORM STRUCTURES ARE TO BE ABANDONED AND REMOVED, CUT AND PLUG CONNECTING PIPES AND/OR REMOVE PORTIONS OF PIPES WHICH MAY INTERFERE WITH OTHER WORK.

CONSTRUCTION NOTES

1. MEET EXISTING LINE AND GRADE.
2. MEET TOP AND FACE OF EXISTING CURB.
3. CORE DRILL EXISTING CATCH BASIN FOR NEW STORM PIPE. PROVIDE WATERTIGHT CONNECTION.
4. PROVIDE 6" NOMINAL HEIGHT CURB.



4 L3.0 **UNDERGROUND STORAGE - SECTION A-A**
NOT TO SCALE



3 L3.0 **UNDERGROUND STORAGE - PLAN**

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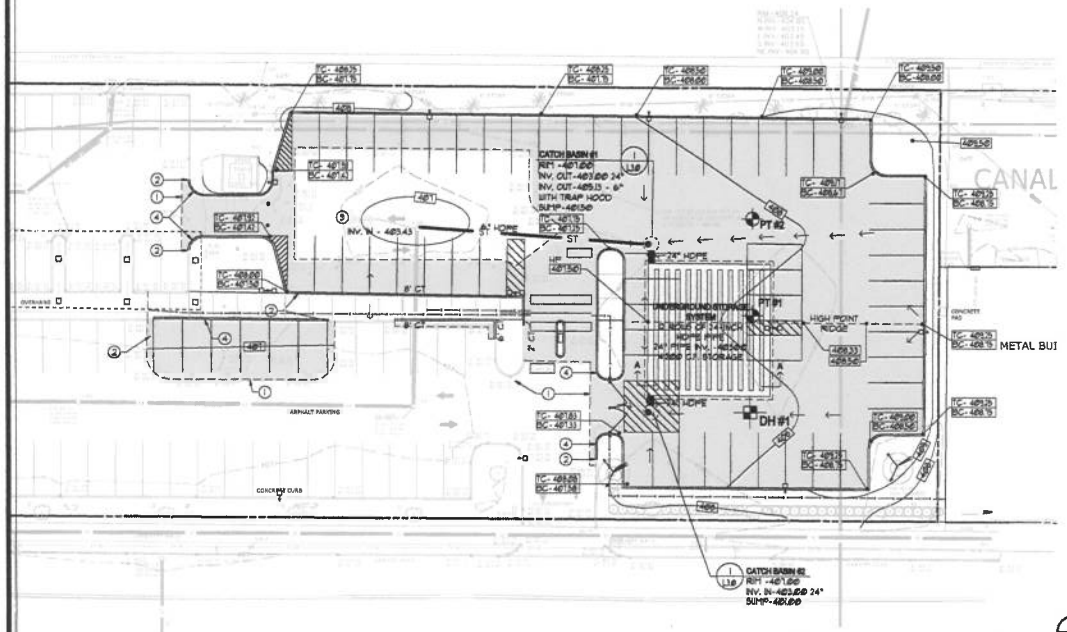

GRADING and DRAINAGE PLAN

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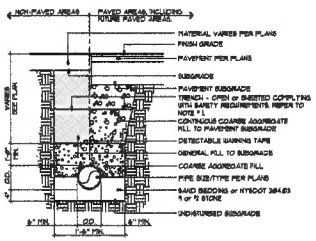
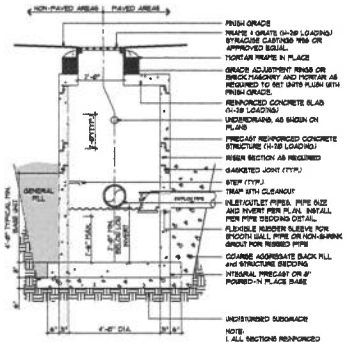


SECTION

NOTES:
1. TRENCH DEPTHS, WIDTHS, SHEETING, SHORING, BRACING and CUTBACK SLOPES TO BE DETERMINED BY THE CONTRACTOR and COMPLY WITH OSHA, NEW YORK STATE DEPARTMENT OF LABOR, NEW YORK STATE INDUSTRIAL CODE and ALL OTHER APPLICABLE SAFETY STANDARDS.
2. REFER TO PLAN FOR PAVED and NON PAVED DETAILS.

2 L3.0 **PIPE BEDDING**
NOT TO SCALE SS-4000-20A



SECTION

NOTE:
1. ALL SECTIONS REINFORCED PRECAST CONCRETE DESIGNED FOR H-20 LOADING.

1 L3.0 **CATCH BASIN (CB)**
NOT TO SCALE SS-4000-02

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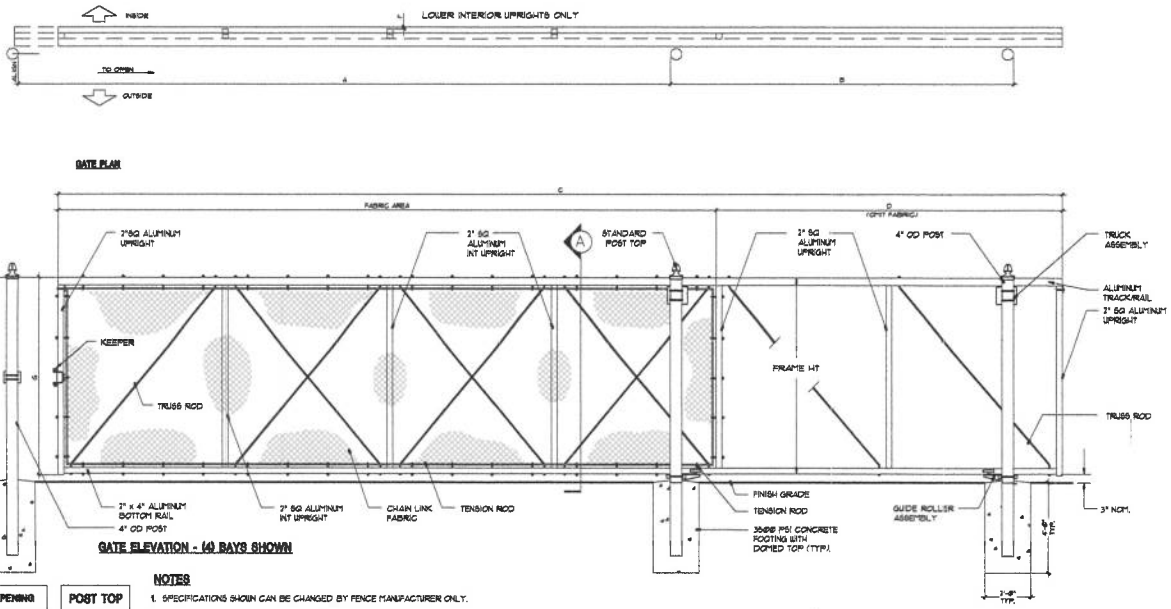
GRADING and DRAINAGE PLAN

L3.0



GATE ELEVATION - (4) BAYS SHOWN

OPENING
20'-0"

NOM HEIGHT (H)
6'-0"

POST TOP
STANDARD
BASE

NOTES

1. SPECIFICATIONS SHOWN CAN BE CHANGED BY FENCE MANUFACTURER ONLY.
2. FOOTING WIDTH TO BE (4)X POST WIDTH. MIN DEPTH TO BE 48".
3. GATE TO BE MECHANICALLY OPERATED WITH A CARD READER SYSTEM.
4. CONTRACTOR SHALL USE ANCHOR FENCE PRODUCTS BY MASTER HALCO (800-229-5663), (www.FenceOnline.com)-CUS24-1126M-WOB, OR APPROVED EQUAL.
5. OWNER TO SELECT POST TOP OPTIONS.

CRITICAL DIMENSION CHART

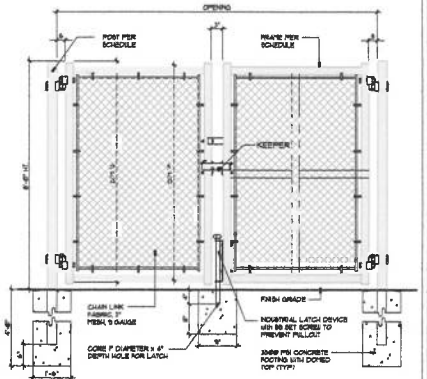
A	CLEAR OPENING	20'-0"
B	COUNTERBALANCE POST SPACING C/C	10'-0"
C	OVERALL GATE LENGTH	30'-0"
D	COUNTERBALANCE LENGTH	10'-0"
E	NOMINAL GATE HEIGHT	6'-0"
F	POST HEIGHT	8'-0"
G	FABRIC HEIGHT	6'-0"

1 L3.1 **CHAIN LINK FENCE**
SINGLE CANTILEVERED SLIDING GATE (6'HT. x 20' OPENING)
NOT TO SCALE

GATE PLAN

GATE FRAME SIZE SCHEDULE

NOM HEIGHT (H)	UPRIGHT HT (U) (ACTUAL DIM)	FRAME HT (F) (ACTUAL DIM)
6'-0"	7'-10"	7'-6 1/2"



DOUBLE GATE ELEVATION

POST SIZE SCHEDULE

OPENING FACE TO FACE	GATE POSTS ROUND SIZES	HINGE SPACE (S) POST TO UPRIGHT
10' LEAF	4" O.D.	3 1/4"

NOTE:

1. CENTER UPRIGHT REQUIRED ON GATE LEAVES 8'-0" + WIDER. CENTER RAIL REQUIRED ON GATE LEAVES 10'-0" + WIDER.
2. TOP OF FOOTING SHALL BE 2" BELOW FINISH GRADE IN LAWN AREAS.

2 L3.1 **DOUBLE LEAF**
CHAIN LINK SWING GATE
NOT TO SCALE

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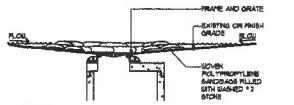
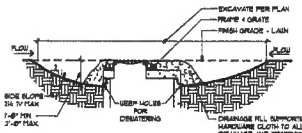
SITE DETAILS

L3.1



NOTES:
1. CLEAR THE AREA OF ALL DEBRIS THAT WILL HINDER SANDBAG PLACEMENT.
2. SANDBAGS TO BE PLACED ON EXISTING GRADE AND STACKED IF NECESSARY TO ELIMINATE DEBRIS FROM ENTERING STRUCTURE.
3. CONTRACTOR SHALL USE A WOVEN POLYPROPYLENE SANDBAG FILLED WITH DRAINAGE FILL (GRADED ¾ STONE) OR AN APPROVED EQUAL.
4. CONTRACTOR SHALL MAINTAIN, REPAIR and REPLACE DAMAGED OR WORN SANDBAGS.

SECTION - PAVED AREAS

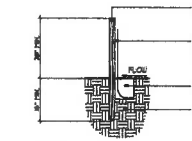


NOTES:
1. CLEAR THE AREA OF ALL DEBRIS THAT WILL HINDER EXCAVATION.
2. GRADE APPROACH TO THE INLET UNIFORMLY AROUND THE BASIN.
3. WEEP HOLES SHALL BE PROTECTED BY DRAINAGE FILL (GRAVEL).
4. UPON STABILIZATION OF CONTRIBUTING DRAINAGE AREA, SEAL WEEP HOLES, FILL BASIN WITH STABLE SOIL TO FINAL GRADE, COMPACT IT PROPERLY, AND STABILIZE WITH PERMANENT SEEDING.
5. MAXIMUM DRAINAGE AREA 1 ACRE
6. CONTRACTOR MAY UTILIZE ANY APPROPRIATE STORM DRAIN INLET MEASURE WHICH COMPLIES WITH NYS STANDARDS & SPECIFICATIONS FOR EROSION & SEDIMENT CONTROL. REFER TO SWPPP, SECTION 7 FOR NYS STANDARDS & SPECIFICATIONS FOR STORM DRAIN INLET PROTECTION.
7. AFTER TOPSOIL, and PRIR GRADING, CONTRACTOR SHALL PLACE 18" x 18" SQUARE OF SOD AROUND STRUCTURE.

SECTION - UNPAVED AREAS

DRAINAGE STRUCTURE PROTECTION

2 / L4.0 NOT TO SCALE S1-1001-02



NOTES:
1. WOVEN WIRE FENCE TO BE FASTENED SECURELY TO FENCE POSTS WITH WIRE TIES OR STAPLES.
2. FILTER CLOTH TO BE FASTENED SECURELY TO WOVEN WIRE FENCE WITH TIES SPACED 24" AT TOP AND MID SECTION.
3. WHEN TWO SECTIONS OF FILTER CLOTH ADJOIN EACH OTHER THEY SHALL BE OVERLAPPED BY SIX (6) INCHES AND FOLDED.
4. MAINTENANCE SHALL BE PERFORMED AS NEEDED AND MATERIAL REMOVED WHEN "BULGES" DEVELOP IN THE SILT FENCE, FENCING SHALL BE INSPECTED MONTHLY, AND FOLLOWING MAJOR RAINFALLS.
5. THE FOLLOWING MATERIALS SHALL BE USED FOR CONSTRUCTION OF THE SILT FENCE:
   POSTS: STEEL EITHER "T" OR "U" TYPE OR 2" HARDWOOD
   FENCE: WOVEN WIRE (14½ GA.) 6" MAX. MESH OPENING.
   FILTER CLOTH: FILTER X, MIRAFI 100X, STABILINKA T140N OR APPROVED EQUAL
   PREFABRICATED UNIT: GEOFAB, ENVIROFENCE, OR APPROVED EQUAL.
6. REFER TO NYS STANDARDS & SPECIFICATIONS FOR EROSION AND SEDIMENT CONTROLS FOR ADDITIONAL GUIDANCE.

SECTION

SILT FENCE (SF)

1 / L4.0 NOT TO SCALE S1-1001-01

STORMWATER POLLUTION PREVENTION NOTES and EROSION CONTROL SEQUENCING

STORMWATER POLLUTION PREVENTION NOTES

1. PRIOR TO THE START OF CONSTRUCTION AND UNTIL ALL DISTURBED AREAS ARE STABILIZED, ALL EROSION AND SEDIMENT CONTROL MEASURES, AS SHOWN ON THE SITE PLAN, SHALL BE INSTALLED AND MAINTAINED BY THE CONTRACTOR, AND SHALL BE IN ACCORDANCE WITH THE LATEST EDITION OF THE NEW YORK STATE STANDARDS AND SPECIFICATIONS FOR EROSION AND SEDIMENT CONTROL, AND THE SWPPP PREPARED FOR THE PROJECT, PRIOR TO THE COMMENCEMENT OF CONSTRUCTION.

2. BARE SOILS SHALL BE SEEDED WITHIN 14 DAYS OF EXPOSURE, UNLESS CONSTRUCTION WILL BEGIN WITHIN 14 DAYS, AS SECTIONS ARE COMPLETED, OR IF CONSTRUCTION ON AN AREA IS SUSPENDED, THE AREA SHALL BE SEEDED IMMEDIATELY.

3. SITE PREPARATION SHALL INCLUDE:
   A. SEEDBED PREPARATION - SCARIFY IF COMPACTED, REMOVE DEBRIS AND OBSTACLES SUCH AS ROOTS OR STUMPS.
   B. SOIL AMENDMENTS
      1. LIME TO pH 6.0
      2. FERTILIZE WITH 6-20-20 LBS OF 5-10-10 OR EQUIVALENT PER ACRE (14 LBS/1000 SQ FT.)
   C. SEED MIXTURES
      1. TEMPORARY SEEDINGS:
         a. RYEGRASS (ANNUAL OR PERENNIAL) @ 30 LBS/ACRE (67 LBS/1000 SQ FT.)
         b. CERTIFIED "ARGENTINE" WINTER RYE (CEREAL RYE) @ 100 LBS/ACRE (2.3 LBS/1000 SQ FT.)
      2. PERMANENT SEEDINGS:
         a. REFER TO SPECIFICATIONS.
         *ADD INOCULANT IMMEDIATELY PRIOR TO SEEDING
   D. METHOD OF SEEDING:
      BROADCASTING, DRILLING WITH CULTIPACK TYPE SEEDER OR HYDROSEEDING ARE ACCEPTABLE.

4. DISTURBED AREAS SHALL BE SEEDED AS NOTED ABOVE AND MULCHED WITH CLEAN STRAW AS OUTLINED IN THE NEW YORK STATE STANDARDS AND SPECIFICATIONS FOR EROSION AND SEDIMENT CONTROL.

5. THE CONTRACTOR SHALL BE RESPONSIBLE FOR KEEPING ON-SITE and STREET PAVEMENT AREAS CLEAN OF DIRT AND DEBRIS.

6. ACCESS TO DISTURBED AREAS SHALL BE LIMITED TO THE AREAS SHOWN ON THE PLAN. THE CONTRACTOR SHALL INSTALL THE STABILIZED CONSTRUCTION ENTRANCE AT THE LOCATIONS SHOWN ON THE PLAN AND ANY OTHER LOCATIONS THE CONTRACTOR INTENDS TO ENTER THE SITE FROM THE ADJACENT ROADWAYS.

7. ANY EXISTING DRAINAGE FACILITIES DISRUPTED BY CONSTRUCTION OR IMPACTED BY INSTALLATION OF EROSION CONTROL MEASURES SHALL BE REPLACED TO MATCH EXISTING CONDITIONS OR BETTER.

8. TEMPORARY EROSION AND SEDIMENTATION CONTROL FACILITIES - AS SEDIMENT ACCUMULATES TO 1/3 THE DEPTH OF THE FOREBAY OR BASIN, SEDIMENT SHALL BE REMOVED AS OUTLINED IN THE NEW YORK STATE STANDARDS AND SPECIFICATIONS FOR EROSION AND SEDIMENT CONTROL.

9. DIRECT ACCESS SHALL BE PROVIDED TO ALL DRAINAGE AREAS FOR MAINTENANCE AND REHABILITATION.

10. ALL DESIGN AND MAINTENANCE MEASURES OUTLINED IN THE SWPPP PREPARED FOR THIS PROJECT SHALL BE IMPLEMENTED AND CARRIED OUT BY THE PARTIES DEEMED RESPONSIBLE FOR THOSE DUTIES IN THE SWPPP.

11. THE PERMITTEE & ITS SUBCONTRACTORS ARE RESPONSIBLE FOR MEANS & METHODS OF EROSION CONTROL FACILITIES DURING CONSTRUCTION. IT SHOULD BE NOTED THAT FACILITIES ON THIS DRAWING ARE CONSIDERED MINIMUM & ADDITIONAL EROSION CONTROL MEASURES MAY BE REQUIRED AS CONSTRUCTION PROGRESSES. THE PERMITTEE & ITS SUBCONTRACTORS ARE RESPONSIBLE FOR ANY ADDITIONAL MEASURES DEEMED NECESSARY BY THE LANDSCAPE ARCHITECT, SWPPP INSPECTOR OR NYSDEC.

12. PROVIDE EROSION CONTROL MEASURES AS NOTED ON THE PLANS AND AS OTHERWISE REQUIRED TO PREVENT EROSION AND SEDIMENTATION ONTO ADJOINING PROPERTY, STREETS, WATERWAYS, AND ON SITE IMPROVEMENTS BEYOND THE LIMITS OF WORK UNTIL A UNIFORM 80% DENSITY OF VEGETATION IS ACHIEVED. COMPLY WITH THE LATEST ISSUE OF NEW YORK STATE STANDARDS AND SPECIFICATIONS FOR EROSION AND SEDIMENT CONTROL AND THE NYSDEC'S "REDUCING THE IMPACTS OF STORMWATER RUNOFF FROM NEW DEVELOPMENT".

13. MAINTENANCE - THE CONTRACTOR SHALL INSPECT ALL DRAINAGE STRUCTURES AND EROSION CONTROLS ON A DAILY BASIS AND AFTER ALL STORMS (½" RAINFALL OR GREATER) INCLUDING BUT NOT LIMITED TO THE FOLLOWING: REPLACING DAMAGED OR SILTED IN EROSION CONTROLS, CLEANING OUT STRUCTURES, AND STABILIZING ERODED OR WASHED OUT SLOPED AREAS.

14. CONTRACTOR SHALL MAINTAIN EROSION CONTROL MEASURES UNTIL CONSTRUCTION IS COMPLETE, A UNIFORM 80% DENSITY OF VEGETATION IS ACHIEVED AND ALL SOURCES OF EROSION HAVE BEEN PERMANENTLY STABILIZED.

15. CONTRACTOR SHALL PROVIDE DUST CONTROL IN ACCORDANCE WITH THE LATEST ISSUE OF NYS STANDARDS AND SPECIFICATIONS FOR EROSION AND SEDIMENT CONTROL.

EROSION CONTROL and CONSTRUCTION SEQUENCE

1. PRIOR TO SITE DISTURBANCE, CONSTRUCT STABILIZED CONSTRUCTION ENTRANCES OF 6" MINIMUM STONE AGGREGATE UNDERLAIN WITH FILTER FABRIC AS SHOWN ON THE DRAWING.

2. SILT FENCE - INSTALL PERIMETER SILT FENCE AS SHOWN ON PLAN PRIOR TO EARTHWORK. SILT FENCE SHALL BE UTILIZED ONLY AS A TEMPORARY MEASURE. DISTURBED AREAS SHALL BE SEEDED IMMEDIATELY FOLLOWING THE COMPLETION OF ANY EARTHWORK PHASE.

3. CLEARING and GRUBBING - REMOVE ALL TREES, STUMPS AND BRUSH PRIOR TO EARTHWORK.

4. STRIP AND STOCKPILE TOPSOIL IN AREA SHOWN ON PLAN AND / OR AGREED UPON LOCATION WITH CONSTRUCTION MANAGER. ENCLOSE TOPSOIL AREAS WITH SILT FENCE.

5. GRADE OUTLET PIPES & STRUCTURES AS SHOWN ON THE DRAWINGS. PROVIDE RIP RAP STONE PROTECTION APRONS AT OUTLET LOCATIONS AS SHOWN ON THE DRAWING. FINE GRADE, SEED AND MULCH WITHIN SEVEN (7) DAYS OF DISTURBANCE. MAINTAIN ALL DISTURBED SOIL AREAS AND DRAINAGE FACILITIES UNTIL COMPLETELY STABILIZED AND VEGETATION IS ACHIEVED.

6. PROVIDE DRAINAGE STRUCTURES AND PIPING, INCLUDING DRAINAGE INLET PROTECTION AS SHOWN ON THE DRAWING.

7. PROVIDE DRAINAGE CHANNELS AND INSTALL EROSION CONTROL MEASURES WITHIN DRAINAGEWAYS.

8. MAKE ALL CONNECTIONS TO EXISTING STORM SYSTEM FACILITIES.

9. COORDINATE GAS, ELECTRIC & UTILITIES (PHONE, CABLE, ETC.) INSTALLATION WITH APPROPRIATE AGENCIES. CONTRACTOR TO TEMPORARY SEED ALL AREAS DISTURBED BY UTILITY CONTRACTORS & OTHERS WITHIN 7 DAYS.

10. EXCAVATE, FILL GRADED AREAS AS SHOWN ON THE DRAWINGS, FINE GRADE, SEED AND MULCH ALL DISTURBED AREAS WITHIN SEVEN (7) DAYS OF DISTURBANCE. AREAS TO RECEIVE ASPHALT PAVEMENT SHOULD BE PAVED WITH AT LEAST THE ASPHALT BINDER COURSE WITHIN SEVEN (7) DAYS OF PLACEMENT OF THE SUBBASE COURSE.

11. REMOVE TEMPORARY CONSTRUCTION ENTRANCE AFTER ASPHALT BINDER COURSE IS PLACED.

12. MAINTAIN ALL DISTURBED SOIL AREAS AND DRAINAGE FACILITIES UNTIL AREAS ARE COMPLETELY STABILIZED AND A UNIFORM 80% DENSITY OF VEGETATIVE COVER IS ACHIEVED.

13. CLEAN DRAINAGE AREAS and SWALES AFTER ALL UPSTREAM CONTRIBUTORY DRAINAGE AREAS ARE COMPLETELY STABILIZED AND A UNIFORM 80% DENSITY OF VEGETATIVE COVER IS ACHIEVED.

14. REMOVE TEMPORARY SILT FENCING, TRANSVERSE DITCH CONTROL MEASURES AND ROCK CHECK DAMS AFTER SITE IS COMPLETELY STABILIZED AND A UNIFORM 80% DENSITY OF VEGETATIVE COVER IS ACHIEVED.

FINAL CLEAN UP

1. REMOVE AND/OR MAINTAIN STOCKPILE AREAS.

2. REMOVE EROSION CONTROL MEASURES FROM STABILIZED AREAS.

3. FINAL CLEAN UP - REMOVE EROSION CONTROL MEASURES AND CLEAN OUT ALL DRAINAGE STRUCTURES ONCE A UNIFORM 80% DENSITY OF VEGETATIVE COVER IS ACHIEVED. OWNER RESPONSIBLE FOR MAINTAINING SITE UPON PROJECT CLOSEOUT.

4. CONTRACTOR, ARCHITECT, AND OWNER TO REVIEW SITE FOR COMPLETION. CONTRACTOR TO ADDRESS FINAL COMMENTS ON PUNCH LIST FROM ARCHITECT AND SWPPP INSPECTION REPORTS.

5. KFA TO SUBMIT NOTICE OF TERMINATION UPON FULL STABILIZATION OF SITE.

WASTE DISPOSAL/SPILL PREVENTION NOTES

WASTE DISPOSAL NOTES:

1. COLLECT AND STORE ALL WASTE MATERIALS AND DEBRIS IN DUMPSTERS OR OTHER ACCEPTABLE WASTE FACILITIES. ALL COLLECTED WASTE MATERIALS SHALL BE LEGALLY REMOVED AND DISPOSED OF OFF SITE. DUMPSTER SHALL BE EMPTIED ON A PERIODICAL BASIS DEPENDING ON GENERATION OF WASTE MATERIAL. NO BURNING OR BURYING OF WASTER MATERIALS WILL BE ALLOWED.

2. STORE, HANDLE AND DISPOSE OF ALL HAZARDOUS MATERIALS AS SPECIFIED BY LOCAL OR STATE LAWS.

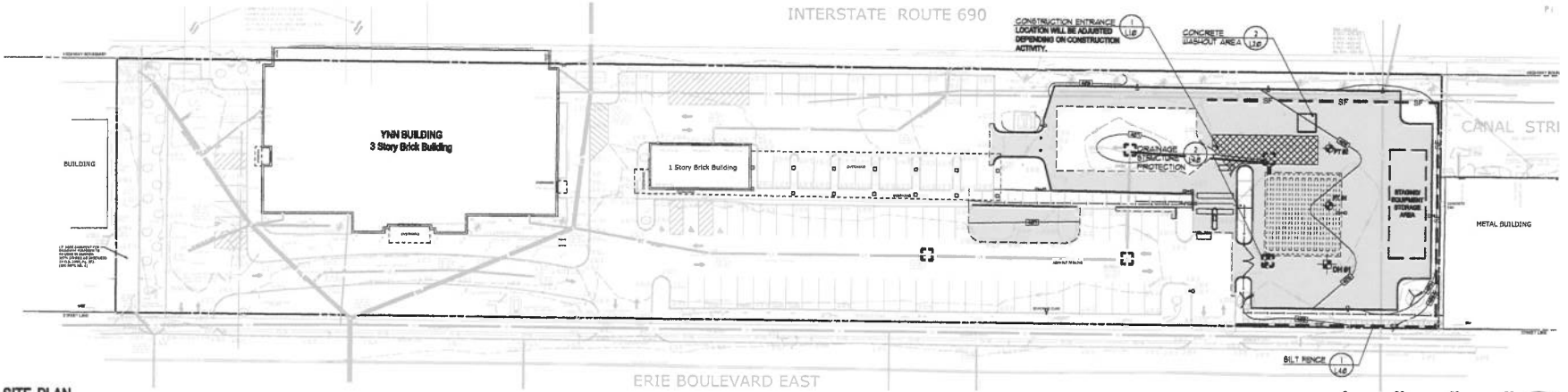
SPILL PREVENTION NOTES:

1. CONCRETE TRUCKS WILL NOT BE ALLOWED TO WASH OUT EXCESS CONCRETE OR DRUM WASH WATER EXCEPT FOR AT DESIGNATED CONCRETE WASHOUT AREAS.

2. ALL ONSITE FUELING OF EQUIPMENT AND VEHICLES SHALL BE CONDUCTED PER NYSDEC GUIDELINES FOR PETROLEUM BULK STORAGE.

3. MONITOR ALL CONSTRUCTION VEHICLES AND EQUIPMENT FOR LEAKS.

4. ALL PETROLEUMS AND LUBRICANTS UTILIZED FOR THE OPERATION OF VEHICLES AND EQUIPMENT SHALL BE STORED IN TIGHTLY SEALED CONTAINERS WHICH ARE CLEARLY LABELED. WHEN POSSIBLE STORE THESE PRODUCTS IN APPROPRIATE CONTAINERS OR UNDER ROOFED FACILITIES.



SITE PLAN

KEPLINGER FREEMAN ASSOCIATES
LANDSCAPE ARCHITECTURE & LAND PLANNING
5310 EAST TAUG ROAD, SUITE 109 EAST SYRACUSE, NEW YORK 13057
PHONE: (315) 445-7780 FAX: (315) 445-7781
KZ Engineering, PLLC

Client:

Contact:

YNN PARKING EXPANSION

815 ERIE BLVD EAST
CITY OF SYRACUSE, NY

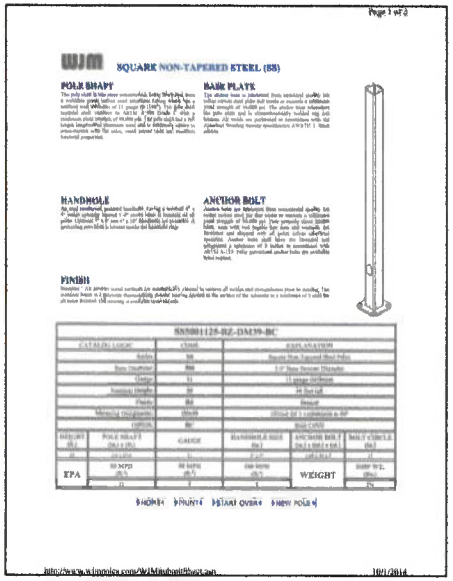
REVISIONS		
1	03/03/2015	GEN. REV.
2	04/20/2015	GEN. REV.
3	03/09/2016	GEN. REV.
4	04/27/2016	GEN. REV.
5	05/16/2016	GEN. REV.

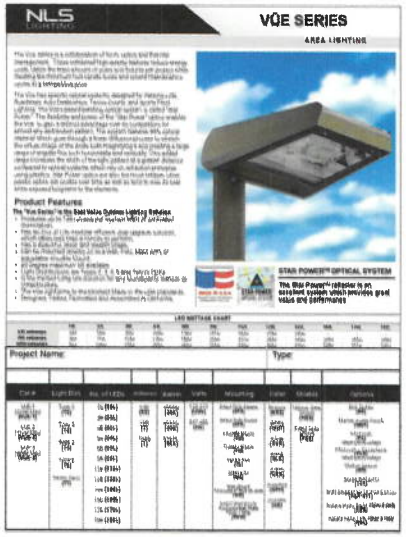
Drawn By: LMW
Checked By: RGK
KFA Proj. No.: 20028
Date: September 30, 2014
Scale: AS NOTED

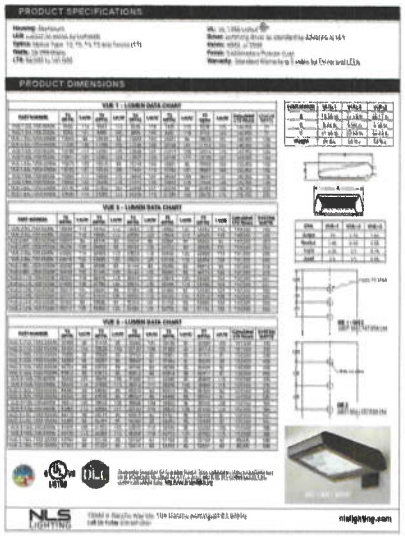
Title:

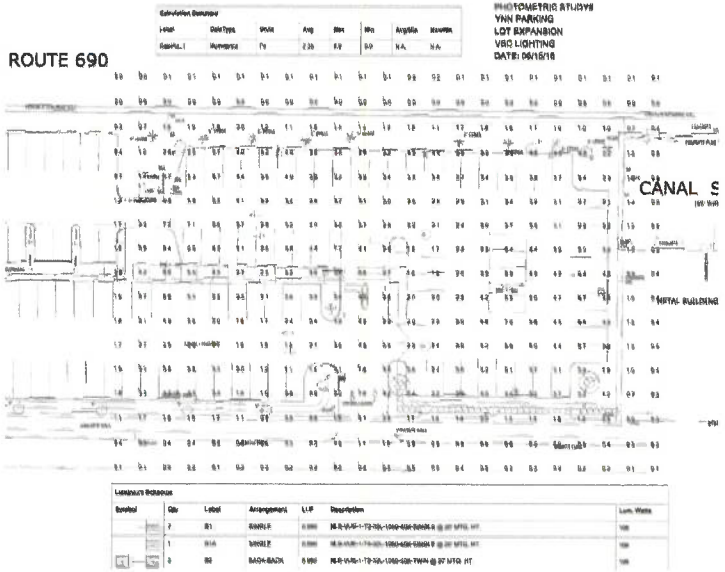
EROSION CONTROL PLAN

L4.0





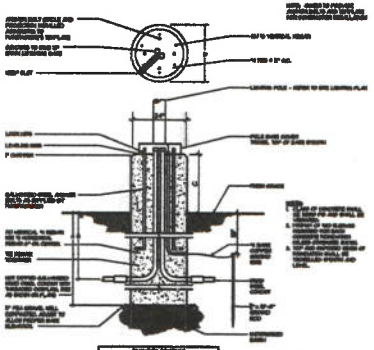




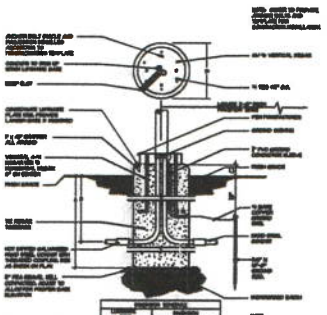
FILE LIGHTING
PHOTOMETRIC STUDY#
YNN PARKING
LOT EXPANSION
VBG LIGHTING
DATE: 06/15/16

SITE LIGHTING PLAN

0 30 60 90
SCALE IN FEET



1 L5.0 FOUNDATION LUMINAIRE BASE - ROUND IN PAVEMENT
NOT TO SCALE



1 L5.0 FOUNDATION LUMINAIRE BASE - ROUND IN LAWN
NOT TO SCALE

KEPLINGER FREEMAN ASSOCIATES
LANDSCAPE ARCHITECTURE & LAND PLANNING
RZ Engineering, PLLC

Client:
Contact:

YNN PARKING EXPANSION
815 ERIE BLVD EAST
CITY OF SYRACUSE, NY

REVISIONS	
1 03/03/2015	GEN. REV.
2 04/20/2015	GEN. REV.
3 02/09/2016	GEN. REV.
4 04/27/2016	GEN. REV.
5 05/16/2016	GEN. REV.

Drawn By	LMW
Checked By	RZK
KFA Proj. No.	3302D
Date	September 30, 2014
Scale	AS NOTED

Title
SITE LIGHTING PLAN

L5.0

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Cc:	Smith, David (DOT); Parmley, Elizabeth (DOT); Doucette, George (DOT)
Subject:	FW: Mayor Walsh Comments regarding the DEIS
Date:	Thursday, October 14, 2021 4:03:18 PM
Attachments:	image001.png 2021 10 14 LETTER City of Syracuse I81 DEIS Written Comments.pdf

City's letter….

From: Jackson, Hayley <HJackson@syrgov.net>
Sent: Thursday, October 14, 2021 3:59 PM
To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>
Cc: Loh, Greg <GLoh@syrgov.net>; Owens, Sharon <SOwens@syrgov.net>
Subject: Mayor Walsh Comments regarding the DEIS

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Good Afternoon Director Frechette,

On behalf of Mayor Walsh, please see the attached letter regarding the Draft Design Report/Draft Environmental Impact Statement.

Thank you,

Hayley Jackson
Executive Assistant
Office of the Mayor, City of Syracuse
233 East Washington Street | Syracuse, New York 13202
Tel: (315) 448-8011
www.syrgov.net

OFFICE OF THE MAYOR

MAYOR BEN WALSH

October 14, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Dear Director Frechette and Administrator Marquis,

This letter is submitted on behalf of the City of Syracuse (the "City") in order to provide comments regarding the Draft Design Report/Draft Environmental Impact Statement (the "DEIS") prepared by the Federal Highway Administration (FHWA) and the New York State Department of Transportation (hereafter referred to collectively as the "NYSDOT"). I greatly appreciate the thorough process under which NYSDOT and FHWA have considered this project and the community outreach and engagement and public input that has occurred over many years. The Community Grid is the right alternative for Syracuse, Central New York and all of New York State (the "Project"). While there are still elements of the Project that must be improved, that fact remains clear.

Therefore, the purpose of this letter is not to dispute the preferred alternative proposed by the NYSDOT, but rather to request that further mitigation for the adverse environmental impacts associated with the Community Grid alternative be included in the Final Environmental Impact Statement (the "FEIS"). See 40 C.F.R. § 1502.14(f) (requiring an FEIS to include "mitigation measures not already included in the proposed action or alternatives"); 40 C.F.R. § 1502.16(h); (stating that an FEIS must discuss "[m]eans to mitigate adverse environmental impacts"). The FEIS should include a detailed discussion of measures that the NYSDOT shall undertake to mitigate adverse environmental impacts associated with the Community Grid alternative. *Oregon Nat. Res. Council v. Marsh*, 832 F.2d 1489, 1493 (9th Cir. 1987) (citing 40 1502.16(h)), rev'd on other grounds, 490 U.S. 360 (1989). A mere listing of mitigation measures would be insufficient. Rather, an adequate FEIS must discuss the mitigation measures in sufficient detail to reveal their efficacy. *Okanogan Highlands Alliance v. Williams*, 236 F.3d 468 (9th Cir. 2000).

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201 City Hall
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It is our sincere hope that the feedback provided by this letter will assist the NYSDOT in crafting a better plan to mitigate the impacts identified in the DEIS. Syracuse will benefit from the Community Grid alternative, but only if adequate mitigation measures are provided by the NYSDOT in order to address impacts proceeding from the construction process and certain design elements of the Project.

First, my greatest concern has been and continues to be the people who live closest to the existing I-81 corridor. They have borne the biggest burden in the past, and their neighborhoods must be protected and invested in. I am concerned about the proposed design and position of the roundabout at Martin Luther King School. We cannot allow expediency of transportation to put our children at risk for decades to come. I request that you listen to the public's feedback and suggestions on this critical element of the Project and modify this design element in the FEIS.

Second, I appreciate NYSDOT's inclusion of a Land Use Working Group for surplus land that will become available as a result of the Project. This group must include the City, the school district, neighborhood representatives, environmental justice groups, economic opportunity and development organizations, and other stakeholders. Land use is a priority concern for the City and its residents, so there must be local control of decision making regarding surplus land, and priority must be given to land uses that benefit environmental justice communities.

Finally, I continue to challenge the State to aim high on local hiring. The City and NYSDOT have worked well together in planning to ensure city residents – especially women, people of color and veterans – get equitable opportunities for jobs and careers from the project. The most critical stages are happening now. I urge NYSDOT Federal Highway Administration to reach an agreement on the goals being put forth, developed in cooperation with community stakeholders, for local hiring and to provide state and federal funds to train and prepare city workers throughout this multi-year project.

This letter shall provide detailed input from the City's perspective on the following topics (presented in alphabetical order):

A. City Streets
B. Community Parks/Facilities
C. Community Impacts & Social Considerations
D. Construction Duration, Phasing, and Mitigation
E. Economic Impacts
F. Emergency Services
G. Geotechnical
H. Lighting
I. MLK School
J. Noise
K. Ownership and Maintenance Jurisdiction, Property Disposition
L. Parking & Public Transit
M. Pedestrian and Cycling Accommodations
N. Public Art
O. Stormwater/Sewage

P. Takings
Q. Traffic Signals
R. Transportation
S. Tree Planting, Landscape, and Environmental Enhancements
T. Utilities Relocation
U. Water Supply
V. Wayfinding Signage

A. City Streets

1. Traffic Detour Wear and Tear on Pavement of City Streets

Page 4-29 indicates: "All other local streets were determined to have enough capacity, without any improvements, to accommodate the projected increases in traffic demand during construction." The City is concerned that increased traffic generated by detour routes will negatively impact the condition of local streets. The City acknowledges that improvements on the City street network have occurred; however, due to limits in funding, these repairs were limited and not as robust as preferred (e.g., utilizing mill and pave rather than full depth reconstruction). City streets used as detour routes will likely require surface treatment and/or restoration due to the impact of increased traffic wear.

We request that mitigation measures be taken to repair City streets that are negatively impacted by use as detour routes.

2. Clinton Street Conversion from One-Way to Two-Way Operation

Chapter 5, page 5-23 of the DEIS states that plans to convert portions of Clinton Street from a one-way to two-way operation will be implemented in approximately 2030, based on current plans. The City has plans to convert Clinton Street to a two-way operation south of Jefferson Street and has consulted with NYSDOT on conversion north of Jefferson Street, with the City agreeing not to proceed at this time.

We request that NYSDOT provide clarification as to the precise portions of Clinton Street that will be converted to a two-way operation and the timeframe for doing so.

3. Reconstruction Limits

Much of the State's proposed reconstruction covers only portions of blocks, stopping short of the closest cross street.

We request that the State provide consistent reconstruction of streets to the closest cross street as opposed to stopping mid-block as is shown on many streets. For example, the proposed reconstruction of Water Street is shown as stopping mid-block between Almond Street and Forman Street. Similarly, the reconstruction of Fayette Street is shown as stopping mid-block between Almond Street and McBride Street.

4. Intersection Level of Service

Section 5.6.1, pages 5-161 states that compared to the No Build Alternative, there will be fewer intersections operating at unacceptable levels (LOS E and F) under the Community Grid Alternative. Reduction would be from 11 intersections (No Build) to 3 (Community Grid). However, there will still be a

substandard level of service at three intersections in 2026 and one intersection in 2056.

We request that the DOT identify ways to improve levels of service and traffic flow at the three substandard intersections identified in this section: Comstock Avenue at Stratford Street (2026 am peak and 2056 pm peak); Teall Avenue at Erie Boulevard East (2026 pm peak) and Walnut Avenue at East Water Street (2026 pm peak).

B. Community Parks/Facilities

1. Community Engagement Regarding Wilson Park

Section 6.7, page 6-538 states that construction activities would increase noise, vibration, and dust at Wilson Park and would affect views of and from it, but these effects would be temporary. Part of Wilson Park would also be temporarily inaccessible due to construction. The stated impact to Wilson Park describes the construction activity as "temporary." However, due to the length of the construction schedule, the impacts must be regarded as more than merely temporary.

Although NYSDOT has stated its intention to repurpose part of the Wilson Park during construction and make improvements upon completion, we request that NYSDOT continue to work with the City Department of Parks Recreation and Youth Programs and the community to plan and construct new/alternative parks amenities (courts, fields, exercise areas, etc.). Although the impacts during construction are temporary, they will nevertheless impact the recreational and social activities of area residents who use Wilson Park for a significant amount of time. NYSDOT should work with the City and community to build new alternative parks.

2. Wilson Park Community Center and Pool Alternatives

Section 6-4-2 indicates that a portion of Wilson Park would be closed during construction, but that the community center and other portions of the park would remain open. The continuation of operations at the community center next to a construction site is not practical or safe. Additionally, the only pool available to this neighborhood will be unavailable during an extended construction period. The next closest pool, located at Kirk Park, is not within reasonable walking distance. Hot summers in Syracuse present an undue burden on children in this neighborhood without alternative options.

We request that the NYSDOT provide funding for a temporary neighborhood pool and alternative community center for the duration of the closure of those facilities due to construction.

3. Wilson Park Improvements

Appendix A-1, Part 2, Drawing GP-CG-H10-07 provides no context for any Wilson Park potential improvements and improvements to surrounding masonry, stone, and surfaces not specified.

The City Department of Parks, Recreation & Youth Programs requests to be considered as part of the staff support and planning team when determining the mitigation and development of Wilson Park. Understanding that plans are forthcoming, recreating a park that will last for generations while ensuring the highest quality of youth enrichment is essential to the goals for the future of Wilson Park. Any changes to Wilson Park should include adequate connections between shared-use paths and the park landscape and amenities. Objectives for the redevelopment of Wilson Park will provide for a planning process to establish a

park frontage to encourage and engage citizens to enjoy the park along a rebuilt Almond Street.

4. Wilson Park Soil

The State proposes in section 6-4-2 that Wilson Park be used as a site for equipment staging during construction. As a result, 20 feet of space within the east edge of Wilson Park will be heavily altered through high levels of soil compaction. Further, 0.12 acres of Wilson Park will be occupied for two years through a temporary easement, creating conditions with the potential to cause long-term soil and site drainage issues.

We request that the NYSDOT: (1) ensure all areas with soil impacted by construction activity, including areas accumulating large amounts of silt, sand and dust, are considered for additional mitigation; and (2) require that all compacted soils be tilled and amended by mixing organic matter into the top 3 feet of the topsoil.

5. Advance Notice of Restrictions/Closures of State and Local Trails

Section 6.4.2 indicates that there will be restrictions and/or closures of state and local trails without advance notification to relative departments within the City of Syracuse during the various phases of construction. These restrictions and closures will have designated and clearly marked detours on nearby local streets.

We request that the NYSDOT provide the City with advance notice of trail closures, estimated timeframes for reopening and communicate with City of Syracuse Parks staff, including the City Trails Coordinator, concerning alternative routes, detours, and mitigation planning.

6. Forman Park Inconsistencies

There are inconsistencies between Appendix A-1, Part 2 & Chapter 3, Figure 3-28 with respect to the proposed plan visualizations and DEIS-provided construction drawings.

We request that NYSDOT amend the proposed plan visualizations of Figure 3-28 to match Construction Drawing GP-CG-H10-12.

7. Forman Park Curb Radius

Appendix A-1, Part 2, Drawing GP-CG-H10-12 proposes curbing at the westbound corner of Genesee Street and northbound corner of the new Almond Street with a curb radius that is too tight for this location.

We request that the State increase the curb radius to one more appropriately suited for the park's location and level of use.

8. Landscape Area and Buffer Specifications

Appendix A-1, Part 2, Drawing GP-CG-H10-16A proposes landscape areas and buffers below bridge structures, between primary arterials, and along roadways that lack specifications for interactions with the surrounding area.

We request that all proposed landscaped areas and buffers be provided through a schedule and map to be shared with municipal stakeholders. Additionally, designs for any proposed and/or updated landscaped areas and buffers should consider surrounding area conditions including drainage, snow storage, nearby

utilities, traffic, recreation ability, ecology, and neighborhood context.

9. New Open Space & Rebuilt Traffic Islands

Appendix A-1, Part 2, Drawing GP-CG-H10-18A depicts new open spaces and rebuilt traffic islands.

We request that the NYSDOT ensure that all new open areas and rebuilt green spaces are adequately replanted and seeded with native grass seed and shrubs. Traffic island areas should be void of impervious surfaces that would negatively impact surrounding plant life and neighborhood character. All traffic island areas should also contain a mix of plantable structural soil and topsoil at a three-foot depth from surface to subgrade. In addition, the State should consider a redesign of the intersection of Hickory Street and Pearl Street. The proposed 90 degree turn from Pearl Street southbound to Hickory Street eastbound could create an adverse impact on winter-seasonal traffic through the accumulation of roadway snow. Adequate snow storage space should also be considered in this area.

10. City Hall Commons

Section 6-2-1.1.4 lists community buildings. *We request that this list be amended to include City Hall Commons.*

11. Oakwood Cemetery

Drawing No. GP-CG-H10-01, which relates to Oakwood Cemetery, does not adequately address the Oakwood Cemetery entrance. The construction of I-81 continues to have a profound negative impact on this nationally significant designed landscape. The construction of the highway embankment blocked the main entrance to the cemetery and eliminated direct access to the cemetery from the Southside neighborhood and from Downtown. In addition, the impact of noise pollution on the cemetery and the surrounding neighborhood has been significant.

We request that the State examine the original entrance and consider alternatives to restore the connection between this historic asset and the community. We further request that the State repair and stabilize the stone cemetery gate and introduce enhancements that improve the overall appearance along the Business 81/cemetery boundary.

C. Community Impacts & Social Considerations

1. Broad Effects on Social Groups

At section 6-2-2.4.2, page 6-74 and Table 4-7, page 4-40, the DEIS indicates that broad effects to social groups are not anticipated. While the DEIS gives consideration during construction regarding impacts on Loretto (proposed building of wall), there is nothing similar for Vinette Towers or other residential housing adjacent to the construction site.

We request that noise and air issues are appropriately recognized and mitigated throughout the construction area, for all impacted residents.

2. Air Quality Protection

Table 4-7, page 4-40 indicates that the NYSDOT will direct its contractor to schedule and conduct activities

and to employ appropriate protection techniques to minimize impacts to air quality and to protect sensitive receptors including schools, hospitals, etc. Statements in the report include the wording "when reasonable."

We request more information with respect to the enforcement of the proposed mitigation. Assuming these techniques are to be strictly enforced, the City requests that the NYSDOT implement penalties for breaches and remediation policies for impacted parties. The City further asks that the "when reasonable" language be stricken in favor of objective limits which are not subject to interpretation. With respect to the limits on means and methods between MLK and Harrison Street, the State should consider implementing similar limits at other locations along the proposed BL81 through downtown that would similarly be impacted by construction activity (e.g., residential apartments, health care facilities, hotel at Forman Park).

D. Construction Duration, Phasing, and Mitigation

1. Disruption of Summer Civic Events

Under Appendix A-1-7, Part 2, NYSDOT explains that Phases 2A1; 2A2; 2A3 will involve a detour of I-690 eastbound traffic through downtown Syracuse, and that the detour will run adjacent to Clinton Square and local streets. This extended detour of highway traffic along the Central Business District's primary plaza, festival and gathering space will increase vehicle and pedestrian risks. Potential shutdowns and detours of streets along Clinton Square or nearby may cause substantial disruption of summer civic events, including revenues generated through permitting by the City of Syracuse.

We request that NYSDOT modify its plans to employ appropriate safety measures to minimize impacts to spaces used for public events, including signage, detour notification, rehabilitation of affected areas, and reconstruction of safe and accessible crossings.

2. Work Zone Traffic Controls

We request that pedestrians, cyclists, and transit users be accommodated via direct routes, not blanket sidewalk closures and detours. Detours should only be employed as a last resort. Pedestrian sheds, physically protected diversions, and other solutions should be considered first.

3. Availability of Project Information

As outlined in 8-5 and section 8.1.2, the Community Grid alternative will take approximately six years to construct, which would involve closure of portions of I-81 and I-690 during various stages of construction. At these times, traffic would be routed to other highways or local streets. In section 4.5.2, the proposed public walk-in office is open only Monday through Friday from 9 a.m. to 5 p.m.

Considering the six year project duration, NYSDOT must be available to the City, residents, and other stakeholders for project information. This includes construction updates, upcoming closures, claims, general information, and coordination with property owners, among other issues. Establishing a field office (as proposed), a point of contact (or team), and a website/app to provide this information and access to the project is essential.

We request that NYSDOT also implement weekend and evening hours at its field office. In sections referencing use of media, we recommend specifying the need to engage media targeted to impacted

communities (e.g., Southside Stand, Urban CNY, Northside e-blast, etc.). The proposed phone line should include non-English services. Additionally, the Air Quality Control section of the DEIS must specify how notifications will be given to those affected when air quality safety limits are exceeded. Noise and vibration mitigations are listed as being employed "when reasonable." We further request more specific details concerning how reasonability is to be determined, especially given that construction is proposed to occur from 6:00 a.m. to 9:00 p.m. Be advised that the City's Construction Noise Ordinance Section 40-6 General Ordinances states that "No noise between 9:00 pm and 7:00 am Mon-Sat and no noise on Sunday and Holidays. This shall not apply to emergency work, and safety and protective devices."

E. Economic Impacts

1. Information Regarding Travel Delays and Impaired Access to Businesses

Construction of the Community Grid Alternative will require temporary lane and road closures. These closures will adversely impact local businesses by causing travel delays and impaired access to certain properties. Section 6-3-2 and Table 4-7 of the DEIS acknowledges that businesses in and near the project area will be adversely impacted. As mitigation, the DEIS states that the contractor will be directed to install temporary business signs to identify business entrances and to direct customers to businesses that would be affected by detours.

We request that, in addition to temporary signs and detour signs, information about how to access businesses be included in the App or Social Media Platform identified in the public engagement commitments section of Table 4-7.

2. Impacts of NYS&W Bridge Replacement and Track Relocation

Chapter 4, page 4-25 states that replacement of the NYS&W Railway bridge and relocation of the railroad tracks would occur in phases, with limited, short-term impacts to railroad operations. However, impacts to residences and businesses during this construction were not addressed in the DEIS.

We request that the DOT provide additional information concerning (1) how far railroad track upgrades will extend, (2) the extent of any impacts to the existing footprint of the railroad, and (3) any impacts to residences and businesses during these construction phases.

F. Emergency Services

1. Impact on Emergency Services

All of the projects listed in Figure 3.8.21 (in each phase) will impact our current emergency response model, especially as it relates to serious motor vehicle collisions on interstate highways. During each phase, additional manpower will be necessary for the fire department to continue to provide fire & emergency services safely and efficiently. Some areas of the City could be less accessible, especially in terms of specialty responses. Our hazardous materials unit, squad, and rescue companies have special equipment and skill sets that most fire companies do not. We will need to ensure that such resources will be equally available to all city neighborhoods at all times.

We request that the NYSDOT provide the City with funding for additional firefighters and equipment (in

strategic locations) during each phase of this project to ensure that emergency services are not critically disrupted.

2. Closed Fire Station on East Fayette Street

The disruption of I-690 and I-81 in the phases set forth in Section 4.3.1 will make impact emergency responses in certain areas of the City with the Syracuse Fire Department's current deployment model. Based on call data for the past several years, the area immediately east of the I-81 viaduct is one of our busiest response areas. While the I-81 viaduct is being removed and that portion of the community grid is being built, Fire Department resources will be impacted in the response area. This area was previously served by a fire station situated on East Fayette Street that ranked among the busiest fire stations in the United States. That station was closed in 2013. The other fire stations that now cover this response area will be impacted by the construction. To safely and efficiently serve this area of the City during the I-81 project, a fire station must be built and staffed in the vicinity of the closed station.

We request that the NYSDOT provide the City with funding for a fire station (and personnel) covering the area that becomes geographically isolated during the construction phase of the Project.

3. Opticom Traffic Preemption System

Page 5-141 and Appendix C-1 (Existing Traffic Control Devices) does not adequately address integration of Opticom traffic preemption systems with the Project. The Syracuse Fire Department utilizes the Opticom traffic preemption system to safely travel through busy intersections. There are 314 intersections in the city that utilize this system, including several in the area of the project. The community grid will make safe and efficient emergency travel through this part of the City impossible without traffic preemption capability.

In order to ensure safe and efficient emergency travel both during construction and after completion of the Project, we request that NYSDOT install Opticom systems at every new intersection the community grid creates or provide the City with funding for Opticom traffic preemption systems at all intersections created by the community grid.

4. Response Times

The City is concerned about potential response disruption created by this Project which could lengthen response times. Multiple neighborhoods may be negatively impacted by a delayed fire department response. Getting adequate resources to the census tracts in close proximity to the Project could take longer than usual. Currently, the Syracuse Fire Department has one of the best average response times in the state. Delayed responses result in poor patient outcomes during medical emergencies, and significant property damage during structure fires. Repeated major fires in neighborhoods will harm property values. An inability to bring an adequate amount of firefighting resources to a scene in a short period of time could also negatively impact our ISO class 1 PPC rating.

We request that the NYSDOT provide the City with funding for additional firefighters and equipment (in strategic locations) during each phase of this project to ensure that response times are not severely impacted.

5. Hazmat Response

In section 6-4-10.1 a HW/CM Assessment was completed for the Project Area, which identified over 250 sites of potential concern. The Syracuse Fire Department Hazardous Materials Response Team covers all of Onondaga, Oswego, and Madison counties. Any type of hazmat release/spill in the project area will require a response from the SFD team. These services are deployed City-wide, and may be particularly impacted by Project-related closures.

We request that the NYSDOT provide the City with funding for extra hazmat resources, or reimbursement for equipment and supplies used to mitigate any releases/spills.

6. Access to Camera Systems

Access to camera systems installed during the Project is not addressed in the DEIS.

We request that NYSDOT consider allowing the Syracuse Fire Department access to any camera systems the State may add to the new road system to enhance response time to traffic and accidents along the new routes or changed roadways.

7. Increased Police Department Costs

Based on our early examination of the 81 project, the SPD anticipates that its patrol and traffic units will need to address traffic enforcement and other traffic issues which will cause the department to dedicate approximately five hours a week involving a supervisor and four officers. The estimated annual cost would be approximately $74,916 to $93,660.

We request that the NYSDOT provide the City with funding to offset these increased costs associated with the Project.

G. Geotechnical

We believe that geotechnical abnormalities exist around the SU hill, possibly near the Renwick/Fineview area, including the possibility of infiltrating water in the ground and gypsum layers. These conditions may impact work in those areas and the proposed roundabout.

We request that the NYSDOT coordinate with the City Department of Engineering and other relevant municipal authorities regarding these conditions prior to undertaking work in these areas.

H. Lighting

1. Lighting District

Chapter 5, pages 5-181 states that, in general, NYSDOT will pay the cost of installing replacement light fixtures for existing lighting that is impacted by a state highway project, and the cost for maintenance would either be funded through a tariff rate with National Grid or through the City of Syracuse.

The City will need to review this impact as the lighting scheme will be in the NYSDOT right-of-way. Accordingly, the City may not be able to set up a lighting district due to the fact that the right-of-way does not belong to the City. If the lighting is somehow on City land then districts could be established and the adjoining property owners charged with a special assessment for the upkeep of the lighting. The City and

NYSDOT need to discuss this further.

2. Consideration of Lighting

In multiple sections of the DEIS, NYSDOT indicates that the final selection of site elements such as lighting will be determined during the final design.

Lighting is an important project element that must be considered prior to the final design stage of the Project. In addition to the appropriate lighting of vehicular travel lanes, pedestrian scale lighting must be included along sidewalks, bike lanes, under I-690, and in gathering areas like the Canal District, the Creekwalk, and the Lodi Street Overlook area, among others. Lighting should also be used at gateways into the downtown area. Different lighting will signal to vehicles entering the City that there are different driving conditions (e.g., slower speeds, more pedestrians and bicyclists, a street grid, etc.). This lighting cannot be the typical highway lighting used on the rest of I-81; it should be distinct and distinguishable to signal different conditions as users enter the downtown area.

Section 5.6 makes provisions for some lighting of pedestrian areas, bicycle lanes and shared-use paths, but the planned lighting does not appear to follow a consistent scheme.

We request that the State provide consistent lighting treatments for pedestrian, bicyclist, and shared use areas across project limits, including bridges, underpasses, and typical street sections.

3. Lighting During Construction and Demolition

The DEIS does not specifically address lighting during construction and demolition.

We request that the NYSDOT provide further information and that it comply with applicable City requirements and lighting installation policies.

I. MLK School

1. MLK Jr. East Roundabout

Section 3.4.3, and pages 3-33, 4-25, and 5-190 outline NYSDOT's proposal with respect to the MLK Jr. East Roundabout and the MLK School. The DEIS provides limited justification for the roundabout, but references that the new intersection would provide for free flow of traffic as well as enhance pedestrian and bicycle accommodation. During the public hearings, many concerns were voiced regarding the impacts of construction directly adjacent to MLK School. As noted in the DEIS, the proposed construction in this area will require two bridges to be removed as well as the removal of associated structural elements such as abutments and retaining walls. The proposed plan would also entail construction of a new railroad bridge.

The DEIS states in Table 4-7 that NYSDOT will "use saw cutting methods and prohibit impact hammers during the demo of existing structures when reasonable" and "direct contractor to use drilled foundations on all bridge piers and other support structures and prohibit pile driving method." However, noise impacts from the construction are still expected. Overall, the DEIS offers limited discussion regarding protection of the school facility during construction and contains no provision for an alternate school location during construction.

We request that NYSDOT extend the Almond Street Boulevard using slow speed boulevard treatments (narrow lanes, intersections, shared use path, median/ trees and other design elements) to an area south of MLK School and locate the roundabout in an area, at least, 600 feet from any school.

2. One-way bike lane on MLK Jr.

Chapter 5, page 185 references that one-way bike lanes would be provided on both sides of MLK Jr. East between Almond Street and Leon Street, but this statement is not reflected in the DOT's plans. The proposed roundabout at MLK/Almond (BL81) does not show bike lanes. *We request that the DEIS statement be revised for further clarification.*

3. Leon Street Sharrows + diagonal curb ramps

The DEIS proposes placement of sharrows on MLK at Leon Street, with the expectation that cyclists will dog-leg around the intersection to transition between the shared-use path and sharrow facilities. *We request that the DOT continue the shared use path to a more logical terminus area with bike facilities such as Salina Street or the Creekwalk.*

4. MLK Noise Barrier

Appendix A-1 part 2 of 2 indicates that a noise barrier will be installed on the south side of the MLK roundabout but not on the north side of the roundabout adjacent to MLK School. *We request that a noise barrier be installed adjacent to MLK School.*

J. Noise

1. Complaint Response Plan

Section 6-4-6, page 6-319 and Table 6-4-6-21 list six City streets/corridors which will be used as potential detour routes. The increased traffic will result in a perceptible noise level increase at noise sensitive receivers such as schools, hospitals, churches, and playgrounds. It will also have an adverse effect on some businesses and residents. *We request that the State develop a plan for reducing noise in these instances.*

2. Noise Insulation of Publicly Owned School Building

In Section 6-4-6, page 6-326, MLK School was not identified to be studied to determine if noise insulation is warranted.

Given the many concerns about I-81 being at grade near MLK, we request a noise study to determine the appropriate design of building sound insulation and noise barrier placement.

3. Noise Barrier Analysis & Alternatives

In Section 6-4-6, page 6-329, noise barriers were determined to be the most effective method of noise abatement. However, noise barriers were not considered feasible along the local streets in much of the Central Study Area of the project since openings for driveways would need to be provided for the residences and businesses, which would negate the effectiveness of the noise barrier. Therefore, no detailed evaluation of such barriers in the downtown area was conducted.

Because noise barriers were deemed not to be feasible in the downtown area, we request further studies concerning other methods of noise abatement.

K. Ownership and Maintenance Jurisdiction, Property Disposition

1. Disposition of surplus transportation right-of-way

Upon the completion of construction, NYSDOT could dispose of potential surplus transportation right-of-way in the Central Study Area in accordance with Federal and State law, or the Contractor may sell staging sites. At section 8.3, page 8-7 the DEIS states that NYSDOT will form a land use working group consisting of representatives from the city, the city's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel.

This group must include the City, the school district, neighborhood representatives, environmental justice communities, economic opportunity and development organizations, and other stakeholders. Land use is a priority concern for the City and its residents, so there must be local control of decision making regarding surplus land. Formation of this group must begin at the start of construction, not at the conclusion of the project, as proposed by NYSDOT. Reuse and redevelopment of these potential sites should be focused on providing community benefits, which include economic development, recreation, and affordable housing among many others. These sites should meet these various needs based on their location, size, stakeholder input and feasibility.

2. Maintenance Responsibilities

Chapter 5, page 5-182 and Appendix C-6.5, Table C-6.5-1 reference what NYSDOT will own and take maintenance responsibility for with regard to the project roads. The DEIS references that NYSDOT and the City will continue to coordinate associated ownership and maintenance roles. It also directly states that a maintenance agreement with the City will be needed for maintenance of sidewalks and shared-use paths and to facilitate energizing and maintenance of any new lighting constructed along City streets as well as the State-owned lighting along I-81 and I-690 within the City limits.

The City is concerned that City costs/responsibilities to maintain sidewalks and shared-use paths and to facilitate energizing and maintenance of any new lighting will adversely impact the City budget and that maintenance fees under the current maintenance agreement are insufficient. NYSDOT has already determined that maintenance of the shared path will be assigned to the City similar to the Empire State Trail. Further discussion with NYSDOT is needed.

L. Parking & Public Transit

1. Removal of Viaduct Parking

At Table 8.1, 8-10, the DEIS indicates that parking under the existing viaduct would be removed and other lots would be affected. Impacts would be mitigated by replacing or creating parking lots beneath I-690 and by transportation demand management measures.

NYSDOT is requested to reestablish lost parking in an efficient manner that is safer, well-lit, more aesthetically pleasing, and in a manner that has less impervious surface than the current surface parking arrangement. These new parking facilities are also an opportunity to use lighting, public art, creative wayfinding, and other design features to enhance the otherwise uninspired views of parked cars.

2. Parking Meter Revenue from On-Street Parking

Chapter 5, page 5-176 states that there will be a net gain of approximately 575 public on-street parking spaces, as 147 on-street spaces will be lost but 722 spaces will be added. Similarly, in Appendix A-1, the State proposes several new parking areas in the City's Central Business District along new and reconstructed streets.

We request further clarification regarding whether the new on-street parking spaces will be metered and who will bear the responsibility for collecting parking meter fees. Some maintenance responsibility is being assigned to the City, but the City's maintenance fee has not been revised in many years. We request that fees from parking meters be allocated to the City to help compensate for City maintenance costs.

3. Parking Mitigation

The DEIS proposes construction of new surface parking lots and reinstallation of surface parking areas below I-690.

We request that these parking areas be garaged in consolidated facilities that meet mixed-use objectives set forth by the City in previous correspondence. Parking facilities should also be well integrated with pedestrian and bicycle facilities, offering bike parking and coordination with transit.

4. Transit Accommodations

Currently, the DEIS contains no substantive provisions concerning transit accommodations within the project area.

We request that the State coordinate with the City and Centro to provide transit shelters across the project area and create transit stops that meet existing Centro thresholds (within 25%) with respect to shelter boarding numbers. Additionally, we request that the State provide operational assistance for increased transit frequencies and/or Bus Rapid Transit across the project area as outlined by the MPO in previous reports.

M. Pedestrian and Cycling Accommodations

1. Intersection Conditions for Pedestrians and Cyclists

Sections 3.4.3 and 5.6 propose large intersections and a large number of travel lanes along Almond Street and other corridors. Intersections of this size do not address geometric and operation deficiencies for pedestrians and cyclists within the project limits. Intersections of this size will also require massive crossing spans for pedestrians, creating an environment that is just as, if not more hostile than the existing conditions for pedestrians and cyclists, especially for those traveling east/west who may have limited mobility.

We request NYSDOT consolidate through lanes and turning lanes and reduce the number of travel lanes for all Community Grid corridors to absolute minimums. Boulevard intersections along the Almond Street, Genesee Street, West Street, Adams Street, and Harrison Street corridors should have no more than four lanes.

2. Consistent Improvements to Pedestrian and Cyclist Accommodations

The DEIS proposes numerous investments to improve infrastructure and regional network connections for motor vehicles, but only provides scattered and isolated accommodations for pedestrians and bicyclists. To the extent that the DEIS contains improvements for infrastructure related to pedestrians and bicyclists, such improvements are treated as individual, non-typical, and disconnected pieces.

We request that the NYSDOT improve the consistency of pedestrian and bicycle accommodations throughout the project area and connect improvements to existing facilities wherever possible, including the Bear Trap Creek Bikeway, Creekwalk, Loop the Lake Trail, Empire State Trail, and Connective Corridor. To further improve upon the consistency of these accommodations, we ask that the NYSDOT expand upon planned improvements to the highway right-of-way and on local streets, such as by creating a connection to the landlocked overlook and shared-use path areas between Bear Street and Hiawatha Boulevard. We further request that NYSDOT provide a physically protected cycle track or shared-use path as a continuous feature from the northern project limit, roughly from the Regional Transportation Center, to the southern project limit on Colvin Street.

Similarly, we request that the NYSDOT provide physically protected bicycle tracks/shared-use paths across the bridges and approaching streets at Butternut Street, Spencer Street, Court Street, Brighton Avenue, and Glen Avenue. The sharrows currently proposed on a number of these streets are inappropriate for a project of this magnitude.

3. Consistent Sidewalk Design

The DEIS contains proposals for 5 foot wide sidewalks at a number of intersections along reconstructed and impacted portions of Genesee Street, Almond Street, Washington Street, Fayette Street, and others.

We request that the NYSDOT provide minimum 8 foot wide sidewalks with matching or similar snow storage buffers along all affected areas, as is typical for other areas of the project. We also request that NYSDOT increase the number of fixed vertical objects (such as bollards) on sidewalks throughout the project area to prevent vehicle access without obstructing pedestrian or bike travel.

4. Mid-block Crossing Safety Concerns

Under section 8.3, page 8-6, the DEIS proposes reconstruction of Almond Street with wider sidewalks, cycle tracks, shared-use paths, bumped-out curbs to reduce pedestrian crossing distance, and a median for pedestrian refuge. The proposed benefits of this reconstruction include improvement to mobility and accessibility for pedestrians and cyclists as compared to the No Build Alternative.

We request that NYSDOT consider alternatives for reducing mid-block crossing in dense, urban areas that do not incorporate a raised center median. In particular, alternative designs should be explored for the BL81 corridor south of Harrison Street. Despite incorporating multiple new signalized intersections, the likelihood

of mid-block crossings along the long blocks of this corridor continue to raise serious pedestrian safety concerns under the current plan.

5. Bear Street/Clinton Street Corridors

Currently, the proposed reconstruction of the Bear Street bridge and Bear Street corridor provides improvements for motorists but only incorporates sidewalk updates on the new bridge over BL81. Similarly, the DEIS proposes a reconstruction design for Clinton Street that only offers intermittent accommodations for pedestrians and bicyclists.

We request that the NYSDOT provide a physically protected cycle track/shared-use path along the entire Bear Street and Clinton Street corridors. These areas are critical thoroughfares for all modes of travel and intersect with the newly proposed SUP/overlook as well as the Creekwalk and many neighborhoods.

We further request that the Bear Street bridge over Onondaga Creek receive major aesthetic improvements accomplished through the reconstruction. This should include a shared-use path similar to Hiawatha Boulevard.

6. Almond Street Cyclist Accommodations

The DEIS proposes cyclist and pedestrian accommodations on Almond Street that present numerous safety concerns. The segment of Almond Street between Colvin Street and Burnet Avenue would force bicyclists to navigate unsafe dog-leg transitions and dismounts at high-volume intersections. The DEIS also proposes on-road bike lanes at the large and complex intersection of Almond Street and Genesee Street. *We request that NYSDOT utilize continuous physically separated cycle tracks or continuous physically separated bike lanes, wider crosswalks, and green MMA markings at crossings to allow cyclists a safer, protected crossing.*

7. MLK Jr. East Sharrows

We request that NYSDOT implement sharrows and a physically protected cyclist track/shared-use path on MLK past Leon Street to the project limit. To implement this improvement, NYSDOT should limit travel lane widths to 10 feet in this corridor or 11 feet if heavy truck and bus volumes justify wider lanes.

8. Harrison and Adams Street Accommodations

Under the current proposal, the DEIS only includes a cycle track for one block of the multi-block reconstruction of Harrison Street and no bicyclist accommodations on Adams Street.

We request that NYSDOT revise its proposal to provide a physically protected cycle track/shared use path for the entirety of the multi-block reconstruction of Harrison Street from Salina Street to Irving Avenue, and on Adams Street from Almond Street to State Street.

9. Erie Boulevard accommodations Sidewalks and parking adjustments

The DEIS includes the proposed construction of a physically protected cycle track/shared use path from Teall Avenue to Beech Street. *We request that the NYSDOT implement a similar design throughout the entirety of the reconstructed areas of Erie Boulevard between Crouse Avenue to Salina Street.*

10. ADA-Accessible Alternatives

Appendix A-1 of the DEIS indicates that the NYSDOT proposes to use diagonal curb ramps for pedestrian areas and varying pedestrian accommodations at driveways and curb-cuts, including crosswalks at various driveway locations.

We request that NYSDOT explore alternative designs that offer greater ADA accessibility. Diagonal curb ramps are not preferred by the City or the FHWA (Best Practices Design Guide) and should be used only as a last resort. Likewise, sidewalks should continue unbroken through all driveway openings with constant material and width. We request that the final EIS utilize no sidewalk designs which dip or require transitions, and instead incorporate aprons for all grade changes and utilize NYSDOT Type 2 driveways or similar.

11. Brighton Avenue Pedestrian and Cyclist Accommodations

The Brighton Avenue redesign proposed in Appendix A-1 of the DEIS includes curb and travel lane-adjacent pedestrian and bicyclist accommodations that fail to incorporate sufficient protections. *We propose that NYSDOT implement continuous fixed vertical objects such as pinned jersey barriers and bollards to prevent motor vehicles from mounting or entering designated pedestrian and bicyclist spaces. We also request that the NYSDOT continue pedestrian and cyclist accommodations to more logical terminuses to the north and south, from Lafayette Road to Thurber Street or Salina Street.*

12. Shared-Use Path Along Fineview

The DEIS proposes a new shared-use path along Fineview Place that terminates at Raynor Avenue. This proposed path travels along the rear of the Campus West apartments at a significantly lower elevation and with an unintuitive termination point.

We request that the NYSDOT redesign this path to interact with Syracuse University campus buildings in a more meaningful way by continuing the shared-use path to a more logical terminus such as Stadium Place or Campus Drive.

13. Cyclist Accommodations along Catherine Street

In the DEIS, NYSDOT proposes to reconstruct Catherine Street with on-road bike lanes. However, the proposed transition from separated cycle tracks to on-road facilities introduces unnecessary complexity to the curb line and road striping while providing significantly less safety to cyclists.

We request that the NYSDOT also install new curbing to restrict vehicle travel lanes to a width of 11 feet to protect cycle tracks on both sides of Catherine Street next to the sidewalks.

14. Cyclist Accommodations along Pearl Street

The DEIS does not incorporate cyclist accommodations along any of the new or rebuilt sections of Pearl Street. *We request that NYSDOT provide a physically separated cycle track or shared-use path along all new or rebuilt sections of Pearl Street with green MMA markings at crossings.*

15. Pedestrian and Cyclist Accommodations along James Street

The DEIS does not incorporate cyclist accommodations along James Street and proposes reduced sidewalk widths of 5 feet. *We request that NYSDOT provide a physically separated cycle track or shared-use path along all areas of the rebuilt James Street, green MMA markings at crossings, and sidewalks with a width of*

at least 8 feet and incorporated buffer and snow storage areas.

16. Warren Street and Other Areas

The DEIS proposes narrow sidewalks along Warren Street and other areas within the Central Business District, including areas where the sidewalk is adjacent to the curb. *We request that the NYSDOT ensure that all sidewalks throughout the Central Business District have a minimum width of 8 feet unless reasonable restricting factors are present. However, NYSDOT should ensure that curb adjacent sidewalks are no less than 8 feet in width wherever reasonably possible.*

17. Cyclist Parking Accommodations

Currently, the NYSDOT's proposal provides no parking accommodations for cyclists. *We request that the State provide staple-style racks along all new, rebuilt, or impacted areas. Two racks should be incorporated on each side of the street and located mid-block or at major destination points, and should total approximately four per block.*

N. Public Art

We request that pages 3-37, 3-38, 3-39, 3-40, 3-42 incorporate the use of public art as a gateway feature and consider using murals, lighting, sculpture, monuments, landscape features, etc. as a gateway feature into the City at various points, including: Clinton Street, Oswego Street, Crouse Avenue, Irving Avenue, MLK Jr, West Street, Van Buren Street, Lodi Overlook, and along the Almond Street corridor. We also request that the State incorporate opportunities for public art installations into the design of the Community Grid, especially at entrances into districts/neighborhoods and at key intersections. The State should engage local artists to design site elements including lighting, paving and wayfinding and incorporate art into the final design of structures including bridges, underpasses, retaining walls, sound barriers, etc.

O. Stormwater/Sewage

1. Condition of City Sewer System

Chapter 5, page 5-69 references the City's sanitary, storm and combined sewer system but does not mention the age or condition of sewers or the expected impact of construction activities on the City's aged infrastructure system, apart from mentioning required relocations due to conflicts.

We request that the NYSDOT coordinate with the City to identify sewer infrastructure that requires replacement or lining due to the age and condition of the system. NYSDOT must also clarify how it plans to apportion responsibility for repairing sewer breaks which occur during construction or as a result of construction.

2. Stormwater Runoff - Reduction in Impervious Surfaces

Chapter 5, page 5-197 states that the Community Grid will result in the removal of approximately 5 acres of road and highway pavement and lead to the creation of a number of "open areas" with stormwater runoff benefits, as depicted in Figure 5-46. Some of these locations are within the highway right-of-way.

We request NYSDOT clarify whether the 5 acres of new greenspace will be reserved as part of the NYSDOT's

reduction runoff plan or whether it can be repurposed for development subject to certain restrictions.

3. Onondaga Creek Stormwater Outfalls

In section 6-4-7.4.1, page 6-401 and page 5-196, the DEIS notes that detailed hydraulic analysis will be conducted during final design to demonstrate that project development will not result in adverse impacts to downstream watercourses. However, the DEIS does not specify certain details such as who will be responsible for maintaining the new sewer system or best management practices.

We request that NYSDOT base the hydraulic analysis on the existing conditions of the creek and its existing capacity (with sediment and existing conditions of creek channel walls, banks, etc.). NYSDOT should complete this analysis as soon as possible to verify that the system works. We also request that the NYSDOT demonstrate that there will be no adverse impacts to the creek including, but not limited to, erosion of soil and sediment along the creek bank and creek bed, change in creek capacity, and disruption of recreational use of the creek. NYSDOT must discuss maintenance of proposed facilities and best management practices with the City.

P. Takings

1. Increasing Land Preserved for Taxable Private Use

In Section 6-2-1.4.1 the DEIS states that one of the project's goals/outcomes is to "improve neighborhood cohesion [and] promote use of the street grid and the reconnection of streets." However, the proposal may in fact diminish neighborhood cohesion at the expense of the City's property values by excessively widening Almond Street, Irving Avenue, and South Crouse Avenue. In Section 6-3-1.4.1, NYSDOT rationalizes proposed takings by noting that many of the proposed locations are currently underutilized. However, to the contrary, that is more reason not to devote them to overbuilt infrastructure rather than productive use.

In order to return more State land to taxable private use, we request that the State narrow proposed lane widths, narrow proposed rights-of-way, and reduce proposed takings in street corridors. In order to maximize assessed value of existing and future parcels, we request that the State reconnect more streets with a goal of creating more high-value street frontage for parcels, and generally minimize amount of land given over to public infrastructure. We also request that the State reduce the amount of space devoted to public infrastructure, minimize the need for takings, and maintain or enhance the City's existing inventory of taxable real estate.

Q. Traffic Signals

1. Traffic Signal Coordination

At Table 8.1, page 8-921, the DEIS states that traffic signal coordination, signage, and pavement markings would be improved in the project area. These improvements include new signalized intersections and 41 signalized intersection replacements. No mention is made of traffic signal integration in the interim.

We request that all signals be built or rebuilt with full connection to the Traffic Management Center ("TMC"), thereby ensuring equipment can be part of the TMC interconnect system. Considering the significant re-establishment and re-connection of the City's street grid, NYSDOT must implement a comprehensive

traffic signal coordination evaluation and implementation throughout the project area, particularly in downtown Syracuse. This must go beyond the project limits and include the larger downtown traffic grid and adjacent neighborhoods.

2. Pedestrian Push Buttons and Signals

Section 5.6 provides that pedestrian push buttons and signals are to be installed "where feasible."

We request that the State incorporate pedestrian signals (specifically, pedestrian countdown boxes) in any new or replaced traffic signal without compromise. All intersections are within an urbanized area and require pedestrian accommodations. Intersections designed without these features will be functionally obsolete and not accepted by the City of Syracuse.

R. Transportation

1. General Travel Lane Width and Speed Limit

Sections 3.4.3 & 5.6 indicate that the NYSDOT's intent for the community grid appears to be to maintain its designation as a qualifying highway. This would allow STAA vehicles, including tractor trailer combinations greater than 65 feet, tractors with 28 foot tandem trailers, and 53 foot trailers to use that highway and any other highway street within one linear mile of the qualifying highway. The DEIS proposes a travel lane width of 12 feet for certain portions of the project area, where sections of the roadway would transition between a speed limit of 55 MPH and 30 MPH.

We request that the NYSDOT remove the qualifying highway designation from the Almond Street corridor to ensure the *community grid is used as a network of city streets, not as a highway. NYSDOT should rework street widths to ensure that no travel lanes are wider than 11 feet for any street involved in this project and that the majority of streets conform to a preferred width of 10 feet. This is prudent, as a 12 foot travel lane does not support a 30 MPH design speed and is inappropriate in this context. We request that NYSDOT adopt a more appropriate roadway design with a 30 MPH maximum speed for all areas outside of the limited access highway.*

2. Pavement Markings

Section 5.6 provides that new markings will be installed across the project area.

We request that the NYSDOT clarify that all new markings will be epoxy markings.

3. Intersections and Corner Radii

Appendix A-1 reflects varying corner radii at intersections, including some in excess of 35 feet.

We request that the NYSDOT revise its designs so that no corners or curbing at rebuilt intersections exceed 15 feet in corner radii pursuant to NACTO standards. We further request that, where exceptions to this dimension appear to be required, NYSDOT first explore and document other interventions that allow for wide turning vehicles rather than larger corner radii, such as striping and stop bar locations.

4. Speed Limit Adjustments BL 81

Signing travel lanes that were originally designed for Interstate 81, as well as new areas of roadway at 30 MPH, with 12 foot to 15 foot wide travel lanes is not acceptable.

We request NYSDOT rework street widths to ensure that no travel lanes are wider than 11 feet for any street involved in this project and that the majority of streets conform to a preferred width of 10 feet. This is prudent, as a 12 foot travel lane does not support a 30 MPH design speed and is inappropriate in this context.

5. Intersection design at Almond and Genesee

The DEIS proposal for the Almond and Genesee Street intersection includes a multi-lane intersection with multiple splitter islands, medians, and dedicated turning lanes. Under this proposal, NYSDOT would change the landscape of Forman Park and existing streetscapes to accommodate multi-lane intersection. This would fundamentally change the existing neighborhood gateway that was purposefully designed as part of the Connective Corridor project.

We request the NYSDOT reduce intersection complexity by (i) eliminating the Almond Street northbound and Genesee Street eastbound slip lanes and islands, (ii) combining turning and through lanes to reduce complexity, (iii) reducing travel lane widths to no greater than 11 feet, and (iv) reducing intersection complexity and size to limit the project's impact on the park space and existing streetscape.

6. BL81 Off Ramp and Oswego Boulevard Ext.

The DEIS indicates that NYSDOT proposes the BL81 off ramp and Oswego Boulevard Ext. contain multiple through lanes and wide travel lanes.

We request that the State consolidate through and turning lanes and make travel lanes no wider than 11 feet to force motorists to slow down and reduce high speeds to no greater than 30 MPH.

7. Hickory/Pearl Right Angle Curbing

The DEIS indicates that the Hickory/Pearl southbound travel lane is planned to operate as a turn-only lane with a right angle curb line.

We request that the State taper the curb line or utilize curvature at this location.

8. Alterations to Design of New and Rebuilt Sections of Clinton Street

The DEIS proposes that some portions of Clinton Street include sharrows, 13 foot wide vehicle travel lanes, and narrow sidewalks. We request that the NYSDOT provide minimum 8 foot wide sidewalks with matching or similar snow storage buffer along all areas, as is typical for other areas of the Project.

We also request that the State provide a physically separated cycle track or shared-use path along all areas of the new or rebuilt Clinton Street and provide green MMA markings at crossings.

9. Design and limits of rebuilt/impacted sections of Division Street West

The NYSDOT proposes to reconstruct portions of Division Street and stop its reconstruction mid-block. The portions where reconstruction is proposed will have narrow sidewalks.

We request that the State continue reconstruction to more logical terminus such as the closest intersecting street. Additionally, the State should provide 6 foot minimum sidewalks between Division Street and Solar Street.

S. Tree Planting, Landscape, and Environmental Enhancements

1. Maintenance Responsibility for Landscape Improvements

Section 5.6.4 of the DEIS contains no discussion on maintenance responsibility for landscape improvements.

We request that NYSDOT renegotiate its maintenance agreement with the City, given the significant lawn and tree plantings that are planned in connection with this project. The City's previous maintenance agreement is inadequate in light of current operation costs. We request that any future agreement be appropriately sized and include tree maintenance and grass in the cost estimates.

2. Design Standards Concerning Soils and Rooting Volume Per Tree

The DEIS indicates NYSDOT's proposal for extensive tree planting along the boulevard and all impacted intersections.

We request that NYSDOT provide clarification on design standards related to soil quality, condition and preparation prior to tree planting. The DEIS should be revised to incorporate soil amendment, soil replacement, minimum rooting volume per tree, and use of structural soils under sidewalks to minimize root and hardscape conflicts. All of these components are critical for ensuring success of trees. NYSDOT should consult with the City to implement design standards for soil quality and depth, soil amendment practices, minimum soil volume per tree, use of CU soil under sidewalks to mitigate root and hardscape conflict.

3. Species Palettes for Proposed Tree Planting

We request that the NYSDOT consult with the City regarding suitable species choices for proposed plantings along the boulevard and other impacted areas. The City will provide a species palette for NYSDOT designers to consider for the boulevard based on trees' tolerance to various site conditions, susceptibility of species to pests and disease and species diversity goals to minimize pest and disease impacts on the trees.

4. Buffer Plantings Adjacent to MLK School

The buffer proposed in Figure 3-38 and GP-CG-H10-03 is inadequate to address concerns touched on in Chapters 6-4-4 and 6-4-6.

We request NYSDOT increase the buffer width at this site and plant a 50% conifer mix—specifically Hemlock, Juniper, Northern White Cedar and White Pine. These species are shown to be the most effective at capturing and retaining particulate matter and the conifers will abate noise and air pollution in the winter. In comparison, deciduous trees will not be nearly as effective in the winter. We also request that NYSDOT build a service road to facilitate access and maintenance within the buffer. Additionally, NYSDOT should use a buffer planting mix distinctly different from the boulevard planting species list. Because these are grown in open soils farther from the road, NYSDOT should utilize an exclusively native planting mix at this site.

5. Boulevard (Allee) Tree Plantings

Figures 3-28, 3-29 and 3-41 plus GP-CG-H10-04 to GP-CG-H10-10 demonstrate the scale of planting proposed along the boulevard in areas which are currently low canopy, low income, tree equity areas in the City. While this mitigation of trees helps address that issue, soil quality, soil volumes per tree, and root conflicts with sidewalks are not addressed in the State's plans. These issues must be addressed so as to ensure trees reach the size proposed in concepts.

We propose (1) a minimum of 1050 cubic feet per tree (35' x 10' x 3' deep rooting area). This rooting volume will ensure trees reach maturity and allows for a 35 foot spacing between trees. This slightly closer spacing will discourage lower branching as the trees mature. (2) All tree lawns should have well drained (S-series) soils installed in a continuous trench to a 3 foot depth as the best mitigation for road salt is soil that drains well. Stone, concrete and debris on-site that is between sidewalk and curb after they are installed cannot be allowed to remain. Trees cannot grow in this substrate. (3) To simultaneously achieve soil volumes per tree and mitigate future sidewalk heaving from tree roots, CU structural soil should be installed along the entire length of the sidewalks to be lined with trees. This should be done everywhere in the community grid footprint to allow trees to reach the size proposed in the concepts. (4) To address stability concerns related to sidewalls of curb and sidewalk, CU structural soil can be installed in the tree lawn and under the sidewalk, then the top 18 inches may be removed in the tree lawn and replaced with S Series soil prior to planting.

6. Planting Palette for Boulevard Trees

We further request that the NYSDOT (1) minimize planting of Elm Allee plantings (perhaps to one block) as hybrid elms "resistant" to Dutch elm disease and elm yellows can still succumb to those diseases, and elms are also very prone to a variety of pest issues; and (2) break up oak plantings. The DEC Forest Health group does not recommend planting too many oaks adjacent to each other as roots graft and spread disease, which will be calamitous if oak wilt or sudden oak death appears in CNY.

We also recommend that the NYSDOT maximize diversity of boulevard plantings and have center lane plantings that are different from the east and west sides of the boulevard. The guide recommended urban trees produced by the Urban Horticulture Institute at Cornell should be used to determine which species have the necessary tolerances to urban conditions, especially soil pH, moisture tolerance and success in structural soils. The interventions proposed herein will result in very well-drained soils and the resource guide listed above will help guide designers.

T. Utilities Relocation

Chapter 5, page 5-204 and Appendix C-6 indicates that the cost to relocate all municipally owned utilities would be fully reimbursable. However, these sections of the DEIS do not address utilities that are not being relocated but may be impacted by construction activities due to the age and/or condition of the utility.

Due to the age and condition of City infrastructure, we request that replacement of utilities be considered beyond instances where relocation is required. Experience has shown that limited relocation and the connection to an existing aged system often results in failure at that location or just outside the new construction, resulting in re-work and/or costly repairs. Also, excavating near aging infrastructure can cause collapse or breaking of aging infrastructure during construction or shortly thereafter. There is a "Dig Once"

benefit with respect to replacing aging utilities which the NYSDOT should consider. The City cannot afford to replace all of the aging infrastructure impacted by this project within the project area without substantial economic hardship Water Supply.

U. Water Supply

1. Continuity of Water Supply

The NYSDOT does not provide discussion of water supply or temporary water supply in connection with the Project in Chapter 4 of the DEIS.

We request that the NYSDOT coordinate with the City to identify water infrastructure that requires replacement or lining due to the age and condition of the system and provide funding for replacement and/or improvement of this infrastructure. NYSDOT must also clarify how it plans to apportion responsibility for repairing water main breaks which occur during construction or as a result of construction. NYSDOT must also provide alternate water supply to impacted properties during any disruption greater than 24 hours in duration.

2. Brighton Avenue Bridge Water Mains

In its discussion of the Brighton Avenue bridge reconstruction, DEIS section 4.4.1 does not address how the existing water supply will be maintained along the bridge. Currently, there are two water supply mains located at the bridge—a 12" water supply main and a 24" water supply main.

We propose that the NYSDOT modify its Brighton Avenue bridge reconstruction plans to include replacement of the two water supply mains currently located at the bridge.

3. Hiawatha Boulevard Water Main

In DEIS Table C-6, NYSDOT makes no mention of the 24" water main on Hiawatha Boulevard. *We request that NYSDOT replace the main at this location.*

4. Incorrect Identification of Water Main Ownership in DEIS

Table 6-11-1 identifies several water mains as "OCWA" which are actually owned by City. *We request the NYSDOT work with the City Water Department to correct Table 6-11-1 and to create a plan for ensuring that water mains are replaced and in service before old mains are decommissioned.*

V. Wayfinding Signage

Considering the significant re-establishment and re-connection of the City's street grid, NYSDOT must develop a robust and comprehensive wayfinding program for all users. This includes vehicular wayfinding signage at gateways (Clinton, Oswego, Crouse, Irving, MLK Jr, West, Van Buren, Clinton, Bear, Almond St, etc.) and pedestrian and bicyclist wayfinding signage throughout the project in the City.

1. Wayfinding Signage as Part of Surplus Right-of-Way Redevelopment

Section 6-3-2 acknowledges potential opportunities to redevelop surplus rights-of-way and enhance the connectivity and walkability and bikeability of the re-established street grid.

We request that the NYSDOT consider implementing permanent wayfinding signs and maps, including digital kiosk style services, to help rebrand impacted neighborhoods and districts once construction is complete and direct pedestrians and cyclists who are using the re-established street grid to access business districts and amenities.

Conclusion

We thank NYSDOT for the opportunity to provide these comments. We have appreciated the Department's coordination with the City prior to the submission of these comments and look forward to continuing the City-DOT Working Groups on Infrastructure, Transportation, Planning, Public Safety and Public Information.

We have also greatly valued the way in which NYSDOT has embraced partnership with the City and local stakeholders in developing the SEP 14 local hiring application to the FHWA. With this collaboration, which began more than a year and half ago with the assistance of the Urban Jobs Task Force, the City of Syracuse and Onondaga County is positioned to be one of the first SEP 14 applications in the nation. We have the ability to demonstrate best practices and never before seen success in local hiring and in using major transportation projects to transform communities and people's lives.

Thank you for your work on this transformational opportunity for Syracuse, Central New York and the nation.

Sincerely,

Ben Walsh
Mayor

public comments on the I-81 Draft Environmental Impact Statement

Alexander Lawson <alawson@cnyfairhousing.org>

Thu 10/14/2021 4:42 PM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>
Cc: Sally Santangelo <ssantangelo@cnyfairhousing.org>

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To whom it may concern:

Please find CNY Fair Housing's public comments on the I-81 Draft Environmental Impact Statement in the attached document.

Sincerely,

--

Alex Lawson (he/him/his)

Housing Policy Coordinator

CNY Fair Housing

731 James Street Suite 200

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October 14, 2021

Mark Frechette, PE,
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Dear Mr. Frechette:

CNY Fair Housing agrees with NYSDOT's conclusion that the Community Grid is the best option for replacing the I-81 viaduct in Downtown Syracuse. Removing the interstate highway from the center of the city will improve the public health and safety of neighborhoods in the project area, and the Community Grid has the best potential to yield better housing outcomes for the community.

However, we are concerned about the project's adverse impacts on residents of the project area—particularly during the construction period—and we believe that NYSDOT has a responsibility to mitigate these impacts. NYSDOT must detail its plans for mitigation for residents living adjacent to the viaduct in the I-81 project's Final Environmental Impact Statement (EIS).

There are hundreds of homes located within 100 feet of the highway in the project area—portions of Pioneer Homes are located less than 30 feet from the I-81 viaduct—and in neighborhoods that qualify as Environmental Justice communities as defined by NEPA. Although the Draft Environmental Impact Statement (DEIS) contains promises and procedures to minimize disruption from construction, it is unreasonable to expect that NYSDOT will demolish the viaduct and make other modifications to the parts of the highway that will remain without creating unacceptable levels of noise and air pollution for the people living in those homes.

While the DEIS states that the Community Grid Alternative will not result in the displacement of residents in the project area, this conclusion accounts only for displacement resulting directly from the acquisition and/or demolition of existing homes. NYSDOT's assessment fails to consider potential indirect displacement resulting from less than voluntary

moves by residents seeking to escape the disruption that will occur during the removal and replacement of the viaduct.

NYSDOT's failure to account for indirect displacement induced by construction-related adverse impacts is particularly concerning in light of the Syracuse Housing Authority's (SHA) plans to redevelop several hundred units of public housing within the I-81 project area. Without proper coordination and commitment by NYSDOT and SHA to develop robust anti-displacement protections prior to the commencement of both projects, indirect displacement caused by construction of the Community Grid may jeopardize current SHA residents' ability to exercise their "right to return" to the neighborhood after public housing redevelopment. When combined with market pressures for new market-rate housing near downtown Syracuse and University Hill, the temporary adverse impacts associated with the I-81 project could result in permanent residential displacement.

While we support the removal of the viaduct, NYSDOT can and must do more to mitigate these adverse effects.

A failure to to include appropriate mitigation measures could constitute a violation of Title VI of the Civil Rights Act of 1962. For example, in 2015, residents of the Hillcrest neighborhood in Corpus Christi filed a complaint with the Civil Rights Division of the Federal Highway Administration alleging that the Texas Department of Transportation had failed to adequately mitigate the adverse effects of a highway project on their neighborhood. The Federal Highway Administration's investigation found that the Texas Department of Transportation violated Hillcrest residents' civil rights, and it forced the Texas Department of Transportation to provide relocation funding and assistance for residents of the neighborhood who wished to move.

There are established precedents for mitigating the adverse impacts on housing of federal highway projects. State Departments of Transportation in Kentucky, Nevada, and Texas have all recently designed highway projects that had adverse impacts on nearby residents and their neighborhoods, and each project included extensive measures to mitigate those impacts. These mitigation measures included:

- funding for housing choice vouchers;
- land for new affordable housing;
- funding to construct new affordable housing;
- creation of a community land trust;
- compensation for homeowners; and
- relocation assistance for both homeowners and tenants.

NYSDOT must follow these other state's examples and mitigate the I-81 project's adverse impacts on the neighborhoods situated along the current viaduct. Because the project will have

such diverse impacts, one simple way to do this is to create a Housing Trust Fund that can provide flexible funding for relocation assistance and counseling, the construction of new housing, noise and air pollution abatement, and any other strategy necessary to mitigate the project's adverse impacts on residents and housing throughout the project area. This fund should be administered by a dedicated staff who will work with residents of the project area to address their housing needs and facilitate their housing choices.

NYSDOT must also adjust its designs for surface-level streets such as Almond, Harrison, and Adams to reduce vehicular traffic volumes and speeds through residential neighborhoods as much as possible. The EIS should include new designs for these streets that will calm traffic by reducing the number and width of travel lanes, reducing turning radii at intersections, and introducing signalized crosswalks at intersections such as Almond/Monroe and Almond/Madison. These design changes will improve the safety and livability of neighborhoods within the project area, and that far outweighs any minor adjustment to travel times for those passing through.

This project provides a once in a lifetime opportunity to reimagine our community and begin to address the longstanding racial injustice that occurred with the highway's construction. Doing more to address housing impacts, including funding for improved housing options for people living adjacent to the highway who wish to move, will not only lessen the impacts of construction but can begin to address the historic impact of the highway's original construction.

Sincerely,

s/ Sally Santangelo
Sally Santangelo
Executive Director
CNY Fair Housing

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Subject:	FW: I-81 Viaduct DDR/DEIS - Review Comments 101421
Date:	Thursday, October 14, 2021 3:49:29 PM
Attachments:	DOT Letter Signed - Final DEIS Review Comments 101421.pdf

Comment.

From: David Bottar <dbottar@cnyrpdb.org>
Sent: Thursday, October 14, 2021 3:32 PM
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Cc: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>; jdagostino@smtcmpo.org
Subject: I-81 Viaduct DDR/DEIS - Review Comments 101421

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Mr. Frechette: Please find enclosed a letter from my office with comments regarding the I-81 DDR/DEIS. Thank you for the opportunity to provide these comments.

David Bottar
Executive Director
CNY Regional Planning and Development Board
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Central New York Regional Planning & Development Board
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Paul W. Pinckney, Chairman David V. Bottar, Executive Director

October 14, 2021

Mark Frechette, P.E.
Project Director
NYS Department of Transportation, Region 3
333 East Washington Street
Syracuse, New York 13202

RE: I-81 DEIS Review Comments

Dear Mr. Frechette:

I am pleased to have this opportunity to offer the following comments regarding the I-81 Viaduct Project Draft Design Report/Draft Environmental Impact Statement(DDR/DEIS).

A. Design and Regulatory

1. If the goal of the Community Grid Option is to "disperse traffic throughout the city grid by promoting broader use of the existing street network" why is it necessary to carry the new BL 81 from its southern interchange to a point at MLK East drive as a limited access highway/high speed facility. Why not immediately convert BL 81 from the southern interchange into a low speed boulevard. The extra time to travel along this boulevard from I81 interchange to downtown Syracuse is acceptable and consistent with community grid concept.

2. The design of BL 81 southern interchange to the "touching down point at its first intersection at MLK drive" places an unreasonable amount of congested and heavy traffic immediately adjacent to the MLK Elementary School and a residential neighborhood. This situation violates good design standards and environmental justice requirements. Recommend the first intersection for BL-81 be created in much closer proximity to the southern interchange.

3. Recommend provision of three traffic circles at Brighton, Colvin, and VanBuren to ensure proper traffic calming measures from Interstate Route 81 to community grid boulevard.

4. Recommend connecting VanBuren and E. Raynor Drive in a complete east-west direction to provide more connectivity from residential neighborhoods west of BL 81 to the University Hill area.

5. To continue implementation of community grid concept, strongly recommend turning Colvin Street into traffic circle with major access to SU campus from the south.

6. It appears that the new I-690 interchanges at Crouse and Irving Avenue is simply the reconstruction of the Harrison/Adams Street interchange at a different location. If the Community Grid concept works why is this new interchange needed – this is simply the traditional use of interstate highway single point access standards that typically leads to extreme traffic congestion and traffic back up onto the highway during rush hour.

7. The construction of a new Oswego Street exit ramp from BL 81 S places too much traffic in a congested area of the city with important and historic assets, narrow/short length streets, and significant pedestrian and planned bicycle activity. This exit ramp is unnecessary and contrary to the community grid concept.

8. The planned new ramp at Peal Street to BL 81 N is a very inefficient means to move northbound street level traffic onto BL 81 N because of the requirement for short distant turning moves at the intersections of N. State Street/Willow Street/and Pearl Street. This area is typically very backed up with traffic at the evening rush hour period. Recommend the Pearl Street ramp be eliminated and traffic routed along N. State Street to a newly designed entrance ramp at N. State and Butternut.

9. Per item # 7, recommend the proposed entrance/exit ramp at Willow/James/ Erie Blvd. is eliminated. This appears to simply be moving an existing congested area at Clinton/Salina/Franklin further east without any community benefits.

10. The designation of BL 81 N from the southern interchange to i-690 intersection as a federally "Qualified Highway" designated to handle heavy traffic (including tractor trailers) is completely contrary to goals of the community grid concept. Is there a more appropriate designation for this section. The use of a BL designation is a very outdated highway concept and not consistent with the community grid concept. If the community grid concept works this designation is not necessary. The associated truck traffic for a BL should remain on the interstate highway system.

11. The West Street interchange improvements must include major design changes to West Street to allow complete west-east connectivity from the residential neighborhood to the west to downtown Syracuse and include the elimination of the slip/access road that parallels West Street. This access road creates an additional physical barrier and would not be necessary if West Street is redesigned.

12. Plans to add any additional lanes to BL 81 in either direction north of I-690 are inconsistent with the community grid concept. If the community grid works, these additional lanes are unnecessary.

B. <u>Mitigation</u>

1. As a proactive step recommend DOT use federal highway mitigation funding to construct new housing for tenants at Pioneer Homes, that will be severely impacted by the I-81 Viaduct project, prior to the start of demolition and construction of the highway project.

2. As a proactive step is DOT planning to use federal highway mitigation funding to provide significant capital resources to fund a major construction trades training program in the Syracuse community at least two years prior to the start of demolition and construction.

3. Recommend the I-81 Community Grid concept be expanded to include the construction of major publicly sponsored parking garages at BL 81 S/Court Street and I-690 E/Crouse and Irving to significantly reduce traffic congestion and better use of land resources in the downtown and University Hill area.

4. As part of the centralized parking garage initiative, recommend the I-81 Community Grid concept be expanded to provide for the construction of a light rail /BRT system that will connect the centralized parking garages to major employers and destinations along a defined four mile loop from the Destiny / Court Street Parking Garage / St. Joseph's Hospital / Townsend Street / 1-690 parking garage / University Hill / Downtown / N. Clinton-Solar Street. This mitigation project would significantly reduce traffic congestion and free up valuable property that is currently used for offsite parking facilities in the community.

5. Recommend the I-81 Community Grid concept be expanded to include the proposed BRT James Street/Downtown and University Hill/Destiny routes that were the subject of an SMTC study in 2018.

6. To support the I-81 Community Grid concept, recommend a new interchange be built at the new I-81 route to provide access to University Hill /Skytop area from the south. This interchange would significantly reduce traffic congestion at the proposed I-690 Crouse/Irving interchange

7. To reduce commercial and industrial freight traffic in the area of BL 81 and I-690, recommend funds be directed to fully building out a publicly sponsored business park/warehouse and distribution center / and inland port in the town of Dewitt/Manlius CSX rail area at Kirkville Road with direct ramp/highway access to I-481/new I-81. A modern business park would be a major attraction and magnet for logistics activity in the community and a generator of new property tax revenue for the host communities.

8. Recommend surplus land along the BL 81 corridor /Almond Street be turned over at no cost to the City for business development. What would be the required time frame for this land transfer.

9. Recommend provisions for the use of green infrastructure and bio-retention facilities to help overall storm management practices in the community

10. Recommend design concepts being introduced into the project to enhance renewable energy development in the community including solar powered lighting/smart grid along the corridor route.

11. As a proactive step, recommend DOT use federal highway mitigation funding to capitalize a small business operating and capital improvement loan program to assist businesses impacted by the I-81 project.

12. As a proactive step and related to item 11 above, recommend DOT use federal highway mitigation funding to capitalize a program to support sports recreation and business development activities in the Syracuse Lakefront and Town of Salina that will generate business activity for Destiny USA and the Salina hotel complex development area

13. As a proactive step, recommend DOT use federal highway mitigation funding to capitalize a community public infrastructure capital improvement grant program to address local infrastructure/roads impacted by the I-81 project.

14. Recommend DOT use federal highway mitigation funding to capitalize an endowment which can be used to offset the cost of lost revenue if tolls are removed from a section of the NYS Thruway in the Syracuse area. Removal of these tolls is a means to reduce traffic on Interstate 81/481 and BL 81 and address problems of northbound truck traffic exiting I81 in the Cortland/Homer area and using local roads to access points west of Syracuse.

15. Recommend using mitigation funding to construct an "extension" of State Route 90 in Cayuga County from State Route 90 to US 20/5 west of the City of Auburn, as a means to reduce truck traffic in western Onondaga County and the City of Auburn.

Thank you for the consideration of these comments.

Sincerely,

David Bottar
Executive Director

Dear Mr. Marquis,

When planning the reconstruction of I-81, please take my following comments into consideration:

The roundabout near Dr. King school cannot be anywhere near school. It is murder

The roundabout could move to Brighton at highway turn off. It would be at West St. & E. Fayette St. Not near MLK street or School

Traffic going past school must slow to 20 mph !!

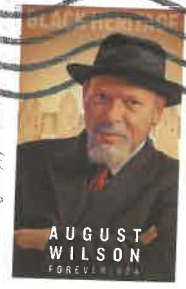
The roundabout makes pedestrians, child & adult, unsafe & is a barrier to areas as bad as raised highway

SYRACUSE NY 130

16 AUG 2021 PM 4 L

Let's talk about I-81.

nyclu.org/i81 | #LetsTalkAboutI81



Mary Cunningham

NAME

412 Orchard St.
Fayetteville NY
13066

ADDRESS

13066

ZIP CODE

DELIVER TO:

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

12207-238699

Dear Mr. Marquis,

When planning the reconstruction of I-81, please take my following comments into consideration:

Almond St. should be no wider than Salina St. it should not be a Business Loop or Qualified Highway

It should have 11' wide lanes. No big trucks. 30 mph only.

No speed up south of Colvin St. to 481 or 81. Stay 30MPH

No roundabout at MLK St. There must be regular inner city traffic speed, neighborhood / kid friendly streets 30 mph. No wide streets No 39,000 cars

SYRACUSE NY 130

16 AUG 2021 PM 4 L

Let's talk

nyclu.org/i81 |

Mary Cunningham

NAME

412 Orchard St.

ADDRESS Fayetteville, NY

13066

ZIP CODE

DELIVER TO:

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

12207-238699

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Subject:	Fwd: Written Comments for DDR/DEIS
Date:	Monday, October 11, 2021 9:00:16 PM
Attachments:	image002.png image003.png image004.png Written Comments for DEIS(10-14-2021).pdf

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I81 comments.

Sent from my iPhone

Begin forwarded message:

> **From:** Merike Treier <mtreier@downtownsyracuse.com>
> **Date:** October 8, 2021 at 6:05:19 PM EDT
> **To:** "dot.sm.mo.I81Opportunities" <dot.sm.mo.I81Opportunities@dot.ny.gov>
> **Cc:** "Frechette, Mark (DOT)" <Mark.Frechette@dot.ny.gov>
> **Subject: Written Comments for DDR/DEIS**
>
> *ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*
>
> Hello,
>
> Attached please find the written comments submitted on behalf of the Downtown Committee of Syracuse for the I-81 viaduct project draft environmental impact statement. We appreciate the opportunity to provide comment, and look forward to the Final Design Report and FEIS.
>
> Thank you,
>
> Merike
>
> **Merike Treier**
> **Executive Director**
>
> 115 West Fayette Street
> Syracuse, NY 13202
> **P** 315.422.8284
> **F** 315.471.4503
> www.downtownsyracuse.com

Downtown Committee of Syracuse

Tony Fiorito, Chairman
Merike L. Treier, Executive Director

115 W. Fayette St., Syracuse, NY 13202 315.422.8284 www.downtownsyracuse.com

October 14, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

RE: Comments on the I-81 Viaduct Project DDR/DEIS

Dear Mark,

On behalf of the Downtown Committee of Syracuse I would like to thank the New York State Department of Transportation (NYS DOT) and the Federal Highway Administration (FHWA) for the information that has been released to date and for the way it has continued to listen to community members and enhance the design work to reflect a transportation solution to best serve our community.

Our mission at the Downtown Committee of Syracuse is downtown's revitalization. Every day we work to foster a vibrant, active, attractive, welcoming and inclusive city center. **We support the Community Grid because it's the best solution to continue downtown's forward trajectory.** The Grid creates opportunities to move people into our city center, provides more economic opportunity and jobs, and leads to further investment in property and new tax resources.

More than $800 million has been invested here, in downtown since 2010, reflecting the work of dozens of developers, builders and investors who believe in a strong urban core, not to mention the hundreds of small businesses and 4,300 (and growing!) residents that now call downtown Syracuse home.

The Community Grid also involves the least disruptive construction approach, displaces the fewest number of businesses and residents, and preserves historic structures, which have been a key component to cultivating our community's character.

More than a decade of studies and public meetings have generated significant information and feedback to lead NYS DOT to recommend the Community Grid. We thank you for the thorough analysis and urge the continued forward movement of this project.

After reviewing the DDR/DEIS, the Downtown Committee of Syracuse respectfully submits the following comments:

<u>Developable Land</u>

- We request NYSDOT look at opportunities to shrink the footprint of Almond Street to create a more walkable urban corridor. Please review the median width being proposed for Almond Street. The proposed width is not in keeping with the character or scale of downtown Syracuse roadways. We ask NYSDOT to reduce the size of this median to create more developable land

east and west of the roadway rather than creating more vacant, unusable space in the middle.

- We commend NYSDOT on the creation of a Community Redevelopment Commission and ask for more detail on how this local working group will oversee and guide redevelopment efforts. Successful community planning can only happen if it's being done "with" the community and not "for" the community. As such, we ask NYSDOT to empower this commission with decision making capabilities to guide future planning for this area. Developed land should result in the creation of new jobs, new tax revenue, and provision of needed amenities.

Connectivity & Design

- Raised cycle tracks are discussed within Chapter 5.6.2. NYSDOT must commit to providing or funding regular maintenance and attention to any dedicated cycle tracks created. This includes daily plowing in winter months. The design must include areas for snow storage as well as take into consideration existing business services, such as trash set out and ability of haulers to access trash cans.

- We ask NYSDOT, as part of the I-81 project, to continue working with Centro and community partners to improve mass transit options with bus service, scheduling, and a review SMTC's "SMART-ONE" BRT study. Please incorporate findings from this study into the Final EIS to reflect how mass transit can play a role in moving people to and between destinations to reduce the number of cars on the road. This will be necessary as central New York undergoes its largest road construction project to date. The timing is right to introduce mass transit as a viable opportunity to move people around the community. As part of this study, SMTC identified planned Park & Ride locations, and these alternative transportation options need to be considered as part of our overall transportation strategy to move people effectively during and after the I-81 project.

- We ask NYSDOT to look further into its ability to incorporate design solutions to make it less attractive and convenient for tractor-trailer type traffic to utilize Almond Street, Salina Street, or the city street grid, unless drivers have a destination point or business to conduct in Downtown Syracuse. The proposed addition of a roundabout, which will maintain traffic flow, but may be less desirable for through trucks to navigate, would be a good solution. However, it must be located in an area that will not result in negative impacts on the neighborhood or its residents.

Canal District

- We request NYSDOT set aside funding to conduct master planning work specific to this concept so it can be further developed with high levels of local community engagement.

Clinton Square

- As the center for cultural events in Syracuse, NYS DOT needs to consider the existing uses of this space and look for opportunities to divert traffic to roadways that may offer more existing yet underutilized capacity or multiple north-south roadways that do not experience the heavy festival and event uses that Clinton Street currently experiences.

Dispersing Traffic

- In addition to dispersing traffic over multiple streets, we request NYSDOT review the width and uses of nearby side streets within the project area, to identify where sufficient capacity exists on side streets, and if the width of side streets is sufficient to accommodate new, anticipated cars. If necessary, NYSDOT should remain open to the possibility of expanding the project area boundaries to ensure a comprehensive transportation network is being developed rather than solely looking at streets within a pre-defined geography.

Traffic Signal Coordination and Optimization

- We request that NYSDOT focus on traffic light synchronization across both the city and DOT systems, which are not yet coordinated, and provide technological and funding partnerships to make this possible. We urge NYSDOT to establish a command post where all the various functions can reside.

Landscape and Environmental Enhancements and Maintenance

- We thank NYSDOT for including a detail on the aesthetic enhancements that would convey a sense of arrival at our gateways. It is important NYSDOT collaborate with local partners to inform any gateway elements and ensure the character of the community is reflected.

- As an organization that spends significant time maintaining public spaces in Syracuse, NYSDOT must develop a maintenance plan that reflects the realities of our local fiscal climate and abilities of municipal and other partners.
    - NYSDOT needs to look at the landscape design, greenspaces and enhancements created with an eye toward maintenance and implement a low-cost maintenance planting plan.
    - Before landscape enhancements and streetscape improvements are built, NYS DOT must work with the municipality and other local partners to develop a mutual agreement/plan for caring for these new spaces.
        - The plan should clearly define maintenance expectations, articulate the roles of each entity involved, incorporate local feedback of what is reasonable, and identify an annual budget (including sources and uses) and staffing plan.
    - A dedicated fund must be developed to pay for the ongoing maintenance of these spaces (trees, planting beds, signage, bike racks, gateway signage) so that maintenance of these spaces is performed and their condition will reflect positively on the community. These funds should come from New York State and not push the burden onto local municipalities.

Construction

When the final decision is made on the future of Interstate 81, sections of our community will be under construction for several years. Throughout this timeframe, and in advance of construction starting, resources are needed to ensure success of our businesses, cultural institutions, attractions, and residents.

- We request the partnership of NYSDOT to establish a Community Benefit Enhancements/Mitigation fund to assist impacted downtown businesses, institutions, and residents. A model we have

researched is from St. Paul, MN for an FTA project. Mitigation measures included a marketing campaign, parking program, community outreach coordinators offering personalized attention in many cases, high levels of community engagement events, a website dedicated to mitigation measures available, forgivable loans for businesses, technical assistance, and information for small business consultants to help businesses with projecting revenue during the construction period.

This project will require cross-organizational cooperation to develop a marketing campaign, so the public knows that Downtown is "Open for Business" and enhanced communications, so stakeholders know what to expect during construction.

- We request NYS DOT establish a fund from which our community can draw from to support a campaign throughout the construction period.

This project is a significant undertaking, the likes of which central New York has not seen before. Demolition, construction, noise, dust, and staging need to be managed in a neighborhood context-sensitive manner.

- We ask that NYS DOT work closely with the City, Downtown Committee and others to ensure a regular flow of information so we can coordinate to keep businesses, property owners and residents well informed about what is happening "next".
- We request NYS DOT develop communication tools to advise our businesses and residents on what to expect while construction is underway.
- NYS DOT must renew its commitment to community engagement and outreach in advance of the construction bidding process, to ensure contractors are aware of constituent concerns and construction requirements. Contractors must be held accountable to the specified approach.
- We request NYS DOT identify offsite parking solutions for construction workers during this time-period and consider the location and appearance of construction field offices to maximize parking availability for downtown customers and the appearance of the community while construction is underway. Potential may exist to lease underutilized office spaces for construction filed offices instead of bringing in moveable trailers.

Parking

There are a series of surface parking lots located underneath the current I-81 viaduct. Patrons of these spaces are New York State employees, visitors to the Erie Canal Museum, and institutional and commercial office tenants and organizations that have secured monthly permit agreements to park within this space. While the construction activity is underway these cars will be displaced for an extended period. The DEIS has removed the parking garage originally proposed in the PDEIS.

- We request NYS DOT include the **construction of a new parking garage in Downtown Syracuse** to accommodate not only State employees, but also the local populations (commercial, retail, visitor) as well. Flexibility in offering much-needed parking options is paramount. This type of community benefit enhancement provides parking for State employees and offers added support to house those displaced during construction.

Jobs

- Recognizing that the I-81 project has the potential to create economic opportunities for our local residents through jobs, it is important that NYSDOT work with our community to prioritize creating employment opportunities for local residents, through initiatives such as Syracuse Build. Additionally, NYSDOT should incorporate contract requirements for local hiring.

Thank you for the opportunity to comment and we commend the team on the tremendous amount of work undertaken to date. We look forward to the Final Design Report/Final EIS for the project.

Sincerely,

Merike Treier
Executive Director

Developer Letter in Support of Community Grid

Merike Treier <mtreier@downtownsyracuse.com>

Thu 10/14/2021 10:08 AM

To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>
Cc: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>

1 attachments (392 KB)

Downtown Developers - I-81 Letter of Opinion-Syracuse.com 10-14-2021.pdf;

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hi Mark,

I'm not sure if you have seen the Letter to the Editor submitted by more than 20 local developers to the Post Standard, but wanted to share this with you in regards to the Interstate 81 project. I have also attached the letter as a PDF.

https://www.syracuse.com/opinion/2021/10/downtown-developers-build-on-our-momentum-by-choosing-i-81-community-grid-guest-opinion.html

Thank you,

Merike

Merike Treier
Executive Director

Downtown Committee of Syracuse

115 West Fayette Street
Syracuse, NY 13202
P 315.422.8284
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Downtown developers: Build on our momentum by choosing I-81 community grid (Guest Opinion)

Updated: 7:45 a.m. | Published: 7:45 a.m.

A view of the Interstate 81/Interstate 690 interchange looking south to downtown Syracuse. "The current viaduct impedes ... growth by keeping neighborhoods divided. Any future viaduct — no matter how well it's designed or branded — will produce the same result," write downtown developers and investors. They support the Community Grid. (N. Scott Trimble | strimble@syracuse.com N. Scott Trimble | strimble@syra

By Special to Syracuse.com

The following guest opinion was submitted by a group of more than 20 Syracuse-area developers, builders and investors. Their names and affiliations appear at the end.

As our community awaits the final decision on the future of Interstate 81, we — local developers, builders and investors — want to voice our support for the Community Grid.

The Community Grid provides opportunities to build upon the momentum that has fueled our city center's resurgence in the past 15 years. Investments in vacant buildings to produce housing — and more recently a prioritization of affordable housing, businesses, entertainment and putting vacant land to productive use has helped our community build a strong, dense city center that will propel our

community forward. Removing the viaduct is removing a barrier. Moving forward with the Community Grid is supporting unity and opportunity.

Since 2010, we have invested more than $800 million in projects, demonstrating our commitment and belief in our community. In that time, downtown has doubled its residential population, is among the fastest growing, and is one of the preferred neighborhoods in the city. At 99% occupancy, apartments are leased as rapidly as we can build them. New restaurants, retailers, services and professional offices have opened to serve the needs and desires of neighbors and employers. Even in the pandemic pause, Downtown Syracuse has welcomed 39 new street-level businesses, fulfilling items identified on our "retail wish list" such as more options for international cuisine and a full-service grocery store.

What do we hear from our residential and commercial tenants now? On top of many lists is a desire for a transportation system that complements the ways in which our city has evolved. More people want to live and work where the action is, and they're leaving vehicles behind when they move to the center of the city — a stark contrast to the trend experienced decades ago when progress was viewed by the construction of the highway system that fueled suburban growth. According to American Community Survey data, nearly 50% of downtown Syracuse residents walk or ride public transportation to work, and more than one-third (35%) do not own a car.

On par with nationwide trends, the future of our region is built around the center of our city. We see this perhaps more clearly than anyone; we have experienced the demand. This is why we have invested millions in rebuilding Downtown Syracuse — and why Downtown Syracuse continues to grow.

We must remove barriers and unite downtown's base of professional services, residential, arts, cultural and dining attractions with the essential services provided on University Hill and its growing educational and medical bases. We must place a focus on re-densifying the center of our community with amenities demanded by our local residents and building a diverse base of quality housing attainable at a variety of price points. We must ensure that growth fostered here, in the center of our community, is aimed at connecting neighborhoods and paves the way to address social, economic and environmental justice issues that have been raised throughout Interstate 81 conversations. We must make downtown accessible and welcoming.

Think about the cities where you enjoy walking. Are you surrounded by mixed uses and pedestrian-friendly areas, or vacant lots and highway overpasses? Reconnecting our neighborhoods and maximizing developable land programmed with inclusive housing, business opportunities and exciting, active storefronts is paramount to creating a strong city center, which produces a return on investment for our entire region. The current viaduct impedes that growth by keeping neighborhoods divided. Any future viaduct — no matter how well it's designed or branded — will produce the same result.

We must seize these opportunities to encourage the next generation — our children — to make their homes here, rather than move away in pursuit of this vision elsewhere.

In June 2015, the Syracuse.com Editorial Board wrote that "Downtown Syracuse is having a moment." In fact, that moment kept building, into a crescendo that only decreased *briefly* in the sudden pandemic pause. Six and a half years later — and 19 months past the March 2020 shutdown — there is still much to look forward to. The Community Grid positions us well for that continued trajectory, but leaving or rebuilding the viaduct will quiet the symphonies of progress more poignantly than any pandemic pause.

Adam Anderson & Eve De Rosa | Knowing Tree LLC

Charlie Breuer | Hueber-Breuer Construction Inc.

Stephen F. Case | Acropolis Realty Group

Thomas J. Cerio | Cerio Law Offices

Richard DeVito | Paramount Realty

TJ DiPeso | Seneca Armory Associates

Robert Doucette | Armory Development

Troy Evans | Commonspace Properties Inc.

Tony Fiorito | Partnership Properties

Lou Fournier | The Sutton Companies

John Funiciello | JF Real Estate

Joe Gehm | Lahinch Group LLC

Tom Goodfellow | Whitlock Partners Ltd.

Ed Gottlieb | Pacific Properties

Joe Hucko | Washington Street Partners

Isaac Jacobs | Carnegie Management Inc.

Meg O'Connell | Salt City Market/Allyn Foundation

Matthew Paulus | Paulus Development

Ed Riley | Hotel Syracuse Restoration LLC, Brine Wells Development LLC

Stephen Schmitt | Liverpool Holdings LLC

Jeremy Thurston | The Hayner Hoyt Corp.

RELATED: I-81 project in Syracuse: Deadline for public comments is soon

RECEIVED
OCT - 8 2021
BY:

October 10, 2021

Mr. Mark Frechette, P. E.
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis, FHWA Administrator
Leo W O'Brien Federal Building
Suite 719, 11A Clinton Avenue
Albany, NY 12207

SENT VIA: E-mail to i81opportunities@dot.ny.gov and copy via US Mail

Please accept our comments regarding the NYS DOT DEIS for the I-81 project. Our businesses include four nationally branded hotels: Homewood Suites by Hilton at 275 Elwood Davis Road, Liverpool, Hampton Inn & Suites, North Syracuse, Tru by Hilton, Liverpool and Super 8 Motel, Liverpool. We also are the Landlords of several other businesses located at Exit 25 of I-81: Sunoco gas station, Dennys sit down restaurant, Burger King fast food restaurant, Dollar Tree shopping, Jersey Mikes restaurant, McDonalds fast food restaurant, and a soon to be developed parcel at the corner of Buckley and Elwood Davis Road. We also own and operate Emmis Farm Market and Antonios Ice Cream Stand on a seasonal basis. Combined, these entities have over 250 employees and over $750,000 in County, Town, and School taxes annually. Some of these businesses have been located at Exit 25 of I-81 since the early 1950's.

The location of our hotels and other real estate holdings offer convenience to all travelers – they were purposely placed here due to proximity to interstate traffic – I-81 is our "Main Street". The Community Grid Only concept as currently proposed by the NYS DOT will severely diminish our ability to attract out-of-town visitors that value the convenience and easy and direct access to I-81 and the entire Syracuse and Onondaga County region. Therefore, we are adamantly opposed to the Community Grid Only proposal.

In your DEIS, the study referencing 1.3% loss of business to our hotels is completely flawed and wildly inaccurate. As the long-term owners and operators of these hotels, we understand the significant portion of business that we derive from I-81 currently will be lost because of a Community Grid detour to the current I-481 pathway. Among our objections to the conclusion in your report:

- No data or input from the owners or management of our hotels or from our neighboring hotels was ever requested by DOT, despite repeated offers and written documentation to DOT officials that we were willing to share such proprietary and confidential information.
- The final analysis and calculation by DOT is so far removed from the actual results that we compile on a regular basis, that is calls into question the validity and accuracy of the entire DEIS.
- Much of the data used in your DEIS is out of date, some of it over five years old.
- The data used was for the entire County and not the specific subject area of the hotels clustered at Exit 25. Hotels in each area of the County have different demand generators and mix of business. The hotels at Exit 25 depend heavily on Interstate traffic, while the hotels in the Downtown cluster do not. Using County wide data and not location specific data will skew the results of any analysis, again, calling into question the validity of the conclusion.
- Importantly, it also does not account for change in the hotel and real estate leasing business models due to Covid-19; the negative impacts of which are projected to be long-lasting and possibly permanent.
- Most significantly, it only examines "guests with no reservations" – it does not consider the impact a Community Grid Only concept will cause to guests who do make a reservation, either weeks or days in advance, or on the same day based on the hotel's location and convenience of I-81 access. In several national surveys of guests, "location of hotel" is ranked as the number 1 or 2 reason for selecting a particular hotel.

In our analysis, the loss of the convenience the highway interchange exits provide will result in greater than 25 percent loss of revenue, resulting in substantial loss of jobs and will jeopardize the viability of the hotels continued operation. Our lenders have placed debt/income ratio performance levels on our notes. If we fall below acceptable levels our mortgage notes will be called.

As a result of reduced traffic to the immediate area, other ancillary services to out of town travelers, such as gas stations, convenience stores, shopping, restaurants – some of which we have a financial interest in – may close or relocate. Reduced revenues and increased costs to the hotels and other ancillary services will reduce the taxable assessment of those properties, which in turn will reduce local government and school tax collections.

Finally, over 50% of our employees use I-81 to travel to/from work. Additional commute time will create a negative impact on our employee retention and recruitment efforts, especially from neighborhoods on the south side of Syracuse, where many of our current employees live.

As the owners of these businesses, we are obligated to protect the long-term viability and continuance of our business from all possible negative impacts – be it flood, economic slowdowns, labor shortages, worldwide pandemics and more. The removal of an Interstate highway from our doorstep is a major negative impact that we are compelled to respond to.

Carmen Emmi
Emmi, LLC

Anthony Mangano
Mangano, LLC

Emmi Commerce Park Development Company
Prima Terra Properties, LLC
Etna Development Company, PC
Buckley Road Development Company
Syramada Hotel Corporation
Emmi & Sons, Inc.
500 7th North St, LLC
LenaDT, LLC
Emmi Development Company

Environmental Justice impact of lead in the removal of via duct

oceannz pille <olpille@yahoo.com>

Tue 10/12/2021 3:23 PM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>

1 attachments (167 KB)

Families for Lead Freedom_DEIS public comment _ 4.25 COMMUNITY DRAFT comments.docx;

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Good Afternoon,

Attached please find the public comment from Families for Lead Freedom Now regarding the the removal of the via duct and bridges associated with I-81.

Thank You,

Oceanna Fair
Southside Branch Leader of Families for Lead Freedom Now

Families for Lead Freedom Now!
c/o Mrs. Oceanna Fair
416 Cannon Street
Syracuse, NY 13205

October 12, 2021

Mark Frechette, P.E.
Project Director
New York State Department of
Transportation, Region 3
333 East Washington Street
Syracuse New York, 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, New York 12207

Attn: Mark Frechette, P.E.
Rick Marquis

We are the elected leadership of *Families for Lead Freedom Now!* We represent an all-volunteer, civil society organization based in Syracuse New York. *Families for Lead Freedom Now!* is composed of approximately 80 individuals, representing nearly 50 families affected by childhood lead poisoning in Syracuse city neighborhoods. We are residents from all parts of Syracuse – North, South, East, and West.

Our Purpose: We call upon the New York State Department of Transportation (NYSDOT) to ensure the safety and health of all those who will be endangered by the demolition of the I-81 viaduct – both workers and community residents who live nearby, particularly in Syracuse Housing Authority residences (e.g., Pioneer Homes, Central Village, McKinney Manor).

As part of the NYSDOT plans to minimize health hazards such as dusts and noise to construction workers and community members during this project, we are

writing to bring attention for the need to include specific guidance regarding lead hazards on the I-81 viaduct project.

Bridges and Lead Danger: As NYSDOT is no doubt aware, construction work on steel bridges that contain leaded paint have poisoned those who work on them, as well as children in the near vicinity.

Both types of poisoning have been documented by the Centers for Disease Control's Morbidity and Mortality Weekly Report (e.g., MMWR 10/13/1989; 5/28/1993; 1/27/1995; 11/29/2013), as well as a 1982 article in the New England Journal of Medicine (Mar 18, 1982; 306: 673-676 "Exposure to Lead from the Mystic River Bridge: The Dilemma of Deleading" by Landrigan et al.).

Cases of increased risk to lead poisoning for communities from bridge work have been documented in news reports (e.g., "Legislator raises concerns about lead exposure from Deering Avenue Bridge Work." *Portland Press Herald*. October 4, 2016), and journal articles (e.g., American Journal of Industrial Medicine 23:191-195 [1995]. "Community Lead Exposure.")

As a New York Times article described it, the danger could not be clearer ("Judge Halts Bridge Effort on Lead Paint" Oct. 7, 1995, Section 1, p., 21): "Lead paint on outdoor steel structures contains lead in far greater amounts than indoor paints. Improper removal can contaminate neighborhoods and poison young children who inhale, eat or drink it."

Prevention Matters: Lead poisoning is a preventable yet devastating environmental disease among children, even at very low levels of poisoning (Matthew Chachère, 2021: "Lead Paint Laws and Regulations in New York City", p. 9 [Northern Manhattan Improvement Corp. Legal Services]). For adults, high levels of lead poisoning from bridge work can result in a host of illnesses, including anemia, arthralgia, and impotence (MMWR 10/13/89). Bridge workers are at risk of carrying home lead dust and negatively affecting family members' heath ("Lead in Construction." Occupational Safety and Health Administration, 3142-12R, 2004).

The Syracuse community already suffers from a high rate of childhood lead poisoning. It is at least nine times higher than the rest of Onondaga County. Our community needs neither more lead poisoning among residents, nor to generate sources of lead contamination that can poison contracted workers or their families.

Clearly, it would be a great tragedy for all involved if NYSDOT and Contractors didn't do everything in their power to prevent lead poisoning among both the bridge workers and the residents living near the demolition, especially those in Environmental Justice communities. As NYSDOT documents in Section 6-2-3 residents of SHA communities near the I-81 Viaduct live in census tracts that are Environmental Justice communities that fit the criteria of either "Minority Community" or both "Minority and Low Income Community."

Therefore, in support of our call for protecting the safety and health of workers and families within environmental justice communities during bridge work on the I-81 Viaduct Project, we strongly and clearly urge NYSDOT to adopt the following twelve (12) recommendations:

1. **A Health Impact Assessment for lead.** NYSDOT should complete its work on assessing lead risks from demolition of the I-81 Viaduct with a health assessment per guidelines from the Centers for Disease Control's online publication titled "CDC Recommendations for Improving Health through Transportation Policy." Specifically, the third and fourth recommendations bulleted under the heading "Design to Minimize Adverse Health and Safety Consequences." (https://www.cdc.gov/transportation/recommendation.htm)

   Given NYSDOT's proximity to the development and publication of the "Record of Decision", we strongly urge NYSDOT, <u>at the least</u>, to work with local community partners to conduct a streamlined version of a Health Impact Assessment (HIA) [https://www.cdc.gov/healthyplaces/hia.htm] based on the six major steps: Screening, Scoping, Assessment, Recommendations, Reporting, and Monitoring.

   Per the experience of an environmental justice community in Cincinnati, Ohio (which conducted an HIA when facing the demolition of a nearby elevated roadway bridge in 2012), either the Health Department or Syracuse University's Falk School of Public Health (https://falk.syr.edu/public-health/), or the Upstate Public Health Program (https://www.upstate.edu/mph/index.php), could be contracted to complete this HIA (see: *Public Health Reports*. "A Community-Academic Partnership to Reduce Lead Exposure from an Elevated Roadway Demolition, Cincinnati, Ohio, 2012." Newman, et al. 2017 Nov-Dec; 132(6): 622-626).

2. **Proper oversight of Lead Exposure Control Plan's implementation should include an on-site field liaison.**

Information in the Draft Environmental Impact Statement (DEIS) about lead hazards in Section 6-4-9.4 "Environmental Consequences of the Community Grid Alternative", says that "limited quantities of lead based paint will be generated by the project…." However, information is lacking about: a) the concentrations of lead in the paint on the elevated highway near the Syracuse Housing Authority communities, and b) whether Class A containment measures (Section 6-4-9) will be employed for bridge demolition.

Given that just a single sugar packet's worth of lead dust can poison multiple children to a tragic degree, proper oversight of the demolition's Developer/Contractors/Subcontractors is critical to protecting Syracuse's families and children living in the vicinity of bridge demolition.

Additionally, while Section 6-4-9.4.1 acknowledges the probability of "structures with lead-based paint" being involved in a demolition process (p. 6-513), there is no description - other than a general, boiler-plate statement ("Testing of each structure would be conducted to identify special lead handling and containment requirements to insure the safety of the workers and the surrounding public during the performance of the work.") - <u>of what specific actions the Contractor will be required to take</u>.

Such generalities raise important questions, such as: What is the NYSDOT pathway to ensuring and verifying that proper testing occurs and then results in proper handling and containment? Who will be engaged in oversight of Contractors and Subcontractors? Who at NYSDOT – not just the Developer or Contractor – can be contacted when the public has concerns? How will safety protocols be communicated?

Per the **Detroit Demolition Protocol**, an on-site field liason should be present to ensure compliance with effective lead containment methods.

See: Carla Bezold, et al. "Demolition Activity and Elevated Blood Lead Levels among Children in Detroit, Michigan, 2014-2018." In'tl Jnl of Envir. Research and Public Health. September, 2020. https://pubmed.ncbi.nlm.nih.gov/32824913/

3. Additions to the Lead Exposure Control Plan: Tacky mats, air monitoring, and public outreach.

In the interest of ensuring the well-being of the surrounding community, we strongly recommend that NYSDOT conduct robust public outreach to ensure nearby residents understand the meaning, purpose, and verification methods for protecting themselves from lead hazards during demolition work.

All nearby residents (six block area) have a right to know about the dangers of chemical hazards from the demolition of the I-81 Viaduct, and the demolition of nearby buildings.

By "robust public outreach" is meant door-to-door canvassing, coordinating with refugee/New American community leaders to convene meetings with their community members, working with NYCLU, Legal Services of Central NY, and other community groups with relationships among nearby residents to bring members to meetings, and hiring public health outreach workers to communicate this message to residents.

Further, given the experience of Cincinnati Ohio (cited above) a Lead Exposure Control Plan should include these items:

a. Provide tacky mats for all residents of SHA housing, and non-SHA housing, within a (6) block radius of I-81.
b. Conduct regular air monitoring of lead dust within a quarter-mile radius.
c. Provide regular outreach about environmental hazards, their control, and personal protection to residents in a six (6) block radius of demolition. Such outreach could be developed with either the Falk School of Public Health or the Upstate Public Health Program.

The six (6) block radius is recommended because, as per our Recommendation #9, children from nearby SHA properties may play with families living closer to the I-81 demolition site.

4. **<u>Project bidding specifications</u> should include (a) required safe work practices and (b) required community-protective demolition techniques of lead-containing structures.**

We call for protection of the community from the removal / demolition of structures taken by eminent domain processes. This should include soil and air testing during demolition of structures taken by eminent domain. (per pp. 6-509; 6-513)

Boilerplate language in Section 6-4-9.4.1 does not sufficiently indicate how either workers' or residents' health will be protected from lead poisoning during this process. Indeed, <u>specific safe work practices and specific community-protective demolition techniques</u> should be used. Their use is critical in order to best minimize lead dust generation and contamination of workers and the community. These work practices and demolition techniques should be required as a primary approach to minimizing lead dust generation and contamination.

- The use of such specific work practices and demolition techniques should be included in the project bidding specifications, and should indicate that such practices and techniques "shall be used."

- Complete details on protection from lead exposure should be included in the Developer's / Contractor's Lead Exposure Control Plan.

- NYSDOT's oversight of this process should be fully articulated in both an HIA and the Developer's / Contractor's Lead Exposure Control Plan.

5. **Use Class "A" Containment methods for viaduct demolition.**

When demolition of the viaduct span occurs, protection of the community in the Lead Exposure Control Plan should adhere to the requirements of "Class A Containment" used for bridge paint removal operations (p. 6-509).

The properly sealed and fitted tarp or similar containment structure must be in place. This tarp needs to adequately contain lead dust and prevent contamination of the air, water, and soil in the vicinity of the I-81 viaduct.

Any casual visual inspection of the Viaduct girders indicates the presence of large amounts of peeling bridge paint that appears ready to flake off, crumble, and spread lead dust throughout our community.

6. **Conduct air and soil sampling within a quarter-mile for lead levels.**

During demolition of the viaduct, in addition to Class A containment methods, the Contractor should conduct regular testing of the air, and pre- and post-project testing of the soil, for lead contamination within a quarter-mile radius for the duration of the viaduct demolition work.

Further, lead soil sampling of playgrounds, ball fields, and related public use areas within a quarter-mile of the viaduct demolition area should be conducted beforehand to obtain a baseline understanding of soil lead levels, then measured again upon completion of the project. This data should be made available for public health purposes.

The quarter-mile measurement is based on field studies of building demolitions in St. Louis, MO, and the related rise in cases of childhood lead poisoning. We recognize there is a difference between a building demolition and bridge demolition work. But until a clear community safety standard is set for bridge demolition, we recommend applying the lessons of the St. Louis building demolition study to the I-81 bridge viaduct work.

See: Bernhard, Blythe. "St. Louis demolitions bring renewed risk for lead poisoning." St. Louis Post Dispatch. Jan. 7, 2019.

(https://www.stltoday.com/news/local/metro/st-louis-demolitions-bring-renewed-risk-for-lead-poisoning/article_e220afea-8a6d-5476-86fa-48eb695ab9b2.html)

7. **Protect workers from lead dust during demolition.**

Everything possible should be done to prevent the carrying home of lead dust by the employee to his or her family. In addition to the Class A containment method (p. 6-509), NYSDOT should require the Contractor to: 1) keep the ground beneath the demolition work clean of lead dust, and; 2) provide workers easy access to clean work clothes, handwashing equipment, and lead-free eating facilities.

Such measures should be included in a Lead Exposure Control Plan. They are fundamental to ensuring that no worker suffers lead poisoning, nor carries home lead dust and, tragically, poisons members of his/her family, including an unborn child.

8. **Employ third-party monitor of construction workers' health and ensure proper training of workers in OSHA respirator standards.**

NYSDOT should employ Upstate Medical's Occupational Health Clinical Center (http://ohccupstate.org/), or a qualified entity of their referral, to monitor the well-being of all workers engaged in viaduct demolition and any and all bridge work (demolition, or not) related to the I-81 Viaduct Project.

Such monitoring should be part of the Developer's / Contractor's Lead Exposure Control Plan.

Additionally, the Lead Exposure Control Plan should ensure that all demolition workers are properly trained in OSHA standards for respirator use if any lead fumes, of any degree, are to be generated (see: MMWR 10/13/89 for where a failure in training resulted in lead poisoning of workers).

9. **Provide free blood-lead testing of nearby residents (six block radius) during demolition.**

NYSDOT should contract with the Onondaga County Department of Health, or another qualified agency (perhaps the Lead Poisoning Resource Center at Upstate: https://www.upstate.edu/gch/services/lead-poisoning/), to conduct pro-active, regular, free blood lead testing of all children living in a six block radius, as well as airborne monitoring for lead dust, during the elevated highway demolition, particularly given the dangers of flaking paint.

The six block radius is chosen since children living on the outer edge of a demolition high-risk zone may be taken to play with children living within the quarter-mile, high-risk zone.

Such testing was stipulated to be performed in the case of the Mystic River Bridge deleading project (blood-lead testing; NEJM 1982, cited above) and recommended in Cincinnati, Ohio in 2012, as mentioned in Recommendation #3 (airborne monitoring; *Public Health Reports* 2017, cited above).

As a society, we have learned many startling facts in recent years about the high toxicity of even small amounts of lead in the environment. Previous experience with precautions are cited here as a guide to the most minimum of protections that a Developer / Contractor should undertake.

10. **Publish de-identified testing results.**

Data from the recommended testing of air, soil, and blood-lead of both workers and children should be made public, both on the I-81 project website and to the news media, on a quarterly basis during the I-81 project. Results of testing for lead, in the aggregate and de-identified, should be made public on the I-81 project's website, with a specific tab on the I-81 project's landing page for easy location.

Public release of data is consistent with the National Environmental Policy Act's underlying principles of public transparency and accountability of public agencies. It is also consistent with a spirit of accountability to environmental communities most adjacent to, and affected by, the Viaduct demolition.

11. **Remove the viaduct through new technology designed for safety.**

Removal of the viaduct should be engineered to minimize lead exposure. NYSDOT should ensure workers have the properly fitting respirators to protect against lead poisoning. NYSDOT should also ensure that the Developer / Contractor reveals how it anticipates the demolition to occur far ahead of the fact given its implications for protecting human health and safety.

The Lead Control Guide for Bridges and Steel Structures (1998) from Mt. Sinai and Hunter College states: "design initiatives from the engineering community and sincere commitments from the construction industry to use new technology are needed so that workplace controls are incorporated in bridge work." (https://www.elcosh.org/record/document/1562/d000133.pdf)

Specifically, we ask: will demolition take place through torch cutting – which causes lead fumes – or by hydraulic shears or by mechanical dismantling? Will construction workers performing tasks related to viaduct demolition have use of fully functioning HEPA vacuum attachments on their equipment?

12. **Consult with community stakeholders in preparation of the Lead Exposure Control Plan.**

Finally, under "Commitments" in NYSDOT's Table 4-7 "Measure to Minimize Community Impacts," in the section marked "Contaminated Materials," NYSDOT states it will "Require Contractor to prepare a Lead Exposure Control Plan (LECP)…. By extension this plan will be developed to protect the general public." The Developer / Contractor should consult with key stakeholders in the community (City, NYCLU, Legal Services of CNY, Families for Lead Freedom Now, Syracuse Tenants Union) about the details and implementation of such LECP as it relates to protecting "the general public."

The LECP should include an objectively robust outreach plan. We recommend contracting with a Syracuse-area Public Health Program to employ masters of public health students to engage in such public outreach.

IN CONCLUSION, human-caused lead poisoning is a matter of great concern in Syracuse, where childhood lead poisoning is already a devastating environmental disease.

Preventing lead poisoning is known to have long term benefits: socially, educationally, and economically. Studies demonstrate we save money for every dollar invested in the prevention of lead poisoning. We urge NYSDOT to take appropriate actions to protect the safety and health of both workers engaged in the I-81 viaduct demolition and our very own community members.

Sincerely,

Families for Lead Freedom Now!
Darlene Medley, West Branch Leader
Gabriel Mkandama, North Branch Leader
Bonfrida Kakwaya, North Branch Leader
Oceanna Fair, South Branch Leader
Feruzi Murarai, East Branch Leader

RECEIVED
AUG 20 2021
BY:

August 17, 2021

Mark Frechette, PE, Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY, 13202

RE: I-81 Viaduct Project Draft Environmental Impact Statement

Dear Mr. Frechette,

I am in full support of the I 81 Community Grid Alternative that has been outlined and presented to the public. The social, economic, and environmental effects of the project when implemented will be overwhelmingly positive for the City of Syracuse and its inhabitants

I am concerned about the potential unintended consequences to Finger Lakes' roads, villages, and towns west of the project. Has NY State considered the impact of increased traffic flow during and after actual construction in these communities?

There are NY City garbage trucks and some number of long-haul trucks (for example, Maersk) that already find it quicker to get from Binghamton as they travel north on I81 to points west—Seneca Falls, Rochester, and Buffalo—by jumping off I 81 far south of Syracuse and coming up roads along Skaneateles, Owasco, Cayuga, and Seneca Lakes. (And likewise heading south on these roads to get to catch I 81 north of Binghamton.)

All traffic (trucks and cars) with a western destination using GPS naturally will be directed to travel up and down these lake roads, which were not designed for heavy traffic, not to speak of the obvious increased safety and environmental risks associated with this type of traffic on the lake roads. This will happen during construction and afterwards when traffic would otherwise be directed northeast around Syracuse to pick up 690 or the Thruway to go ultimately west.

Someone at the state-level must be considering this serious matter. It would be helpful to see what is planned and, if nothing is yet planned, when and how these considerations will be addressed.

Thank you for reading and responding to my letter.

I would be glad to discuss if there is a way that I can be helpful on this matter.

Sincerely,

Daniel J. Fisher
2605 East Lake Road, Skaneateles, 13152; danieljfisher.skan@gmail.com; 315-256-5167

NY DOT public comment,

July 20,2021

Lawrence A. Foisy

301 Palmer Drive

North Syracuse, NY
13212

I must drive my wife to Upstate Hospital many times a year due to her condition. At the present time it is easy as I get off and on I-81 easily. I take I-81 at Northern Lights as I live in the southern part of the village of North Syracuse. When they go to the community grid as I understand the road is going to end about the Hiawatha Boulevard area. What street will we be getting off and will a hospital route be marked so one can be sure they are going the correct way? Navigating in the hospital area of the city is confusing as it is with all the one-way streets.

When going there I must plan my time carefully as once there my wife requires a wheelchair to reach lengthy destinations at Upstate. Sometimes the valet parking is backed up so the last ting I need is to get lost on my way.

Thank you for your time.

Lawrence A Foisy

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JUL 21 2021
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RECEIVED
AUG - 3 2021
BY:

Mr. Mark Frechette, P. E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington St.
Syracuse, NY 13202

August 2, 2021

Dear Mr. Frechette:

I don't know if you would remember, but we met at the meeting in Salina in September 2019. I told you about Business Loop 83 in York, PA, and showed you the map on my phone. Did you ever get down there and talk to the Pennsylvania DOT about it?

WRT the I-81 Viaduct Projects DEIS, several issues came to mind, and I thought the best way to express myself would be in a print letter.

1. One thing that concerns me is how BL81 narrows from three lanes to two as it approaches the roundabout from the south. My plan, based on what I read in the PDEIS, would be to be in the center lane which would become the right, but it strikes me that merge could be nerve racking. I'm wondering if south of the new Colvin offramp, the right lane could become an auxiliary lane that ends in the Colvin interchange, and then BL81 is two lanes the rest of the way to the roundabout.
2. One thing I have noted in driving through Syracuse is on I-81 is the drivers who get on at one exit and get off at a subsequent exit, sometimes the next one. I have done that myself when visiting a friend in Syracuse, getting on I-81 North at Court Street and getting off at Exit 23 to go to the mall. It's slightly quicker than going through traffic lights on North Salina St. So it

troubles me that it appears that someone who gets on BL81 northbound at Bear St. can't get of exit 23 or proceed to Liverpool at that exit if they so choose, based on the way things appear in figure 3-27. I am not sure of it based on figure 3-27, but if this is the case, it should be reconsidered. Perhaps a new northbound service road could be created, starting south of Bear St., that would allow people to getting on at Bear St. to either continue north on BL81 or get off at Liverpool/the Mall.

It just occurred to me as I am editing this letter that the problem is that people coming on from Pearl St. have to merge across two lanes of traffic from 690 before getting off at Court St./Bear St. That's why the exit was moved farther north, so they would have more time to merge. If that is the case, perhaps signage could be put on BL81 to direct people heading for Destiny or Liverpool to get on 690 at Irving (or *eastbound* at Crouse), which would put them in the right two lanes of BL81's northern segment with the 690 traffic. Then the Court St. exit could be done as designed in the PDEIS. Assuming this doesn't make things more confusing. I also realize this is only worth doing if there is a huge volume of traffic getting on I-81 at Court St. to go to Liverpool or Destiny, as opposed to going north on Salina St. and crossing Hiawatha Boulevard (which I have also done).

And that leads to my next point:

3. On a related matter, how will the new 81 and BL81 have their exits numbered? I-81 and I-481 don't have the same number of exits, so that is a question. I think the best option is to renumber ALL the exits on I-81 in New York State, going to a system based on mileage markers.
4. It's a small thing, but the DEIS' executive summary lacks the Colvin St. to Butternut Street view found in figure 3-25. The PDEIS's executive summary doesn't have that omission; it's figure S-3a in the PDEIS. It's the sort of thing anti-grid parties could seize on, and should be corrected for the Final Environmental Impact Statement.

That summarizes everything on my mind currently.

Copy sent to Mr. Rick Marquis.

Sincerely,

Michael J. Gallagher

cc: Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Ave., Suite 719
Albany, NY 12207

July 27, 2021

Mark Frechette, P.E.
Project Director
NYSDOT, Region 3
333 E. Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
FHA
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Re: Interstate 81 - Draft Environmental Impact Statement

Dear Gentlemen:

I am writing on behalf of local businesses, churches and residents, located and who live near the Interstate 81 viaduct, to both thank the NYSDOT and Federal Highway Administration for planning for the future of Interstate 81 and also to communicate that we need more time to review the Draft Environmental Impact Statement ("DEIS") that was released on July 16, 2021.

It is important that we get the DEIS in front of our neighbors for review and comment. A period of 60 days is not sufficient to review the various sections related to traffic, economic impact, air quality, etc.; which span over 25,000 pages. Therefore, I am respectfully requesting that 5 copies of the complete DEIS be provided to me; so we can make them available at high trafficked areas within the area generally known as the 15th Ward and that the public comment period be extended through the end of year so everyone can be provided the opportunity to submit their comments.

As a third-generation local business owner and father, it is critical that all comments and feedback are reviewed and factored into as the process moves forward. The decision before us will impact the next few generations of Syracuse, Onondaga County and Central New York residents. We need to make sure it is done correctly.

Our lives and future of our children are hidden in a stack of papers a mile high! Please confirm the extension of time will be granted and call me at (315) 243-5941 and I will facilitate getting the hard copies of the DEIS distributed. Thanks in advance for your consideration.

Sincerely,

Charles Garland
Garland Bros. Funeral Home

Bishop Carl Clark
Pastor, Open Arms International Ministries

Rev. Kevin Stephens
Pastor, Inspirational House of God

Benjamin H. Garland, Jr., L.F.D., President
Charles E. Garland, L.F.D., Mgr. Garland Bros. Funeral Home Lula M. Garland, L.F.D.
Anjela D. Garland, L.F.D.

Providing Quality Service at a Reasonable Price Since 1929

October 14, 2021

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, New York 12207

Mark Frechette, P.E.
Project Director
NYS Department of Transportation, Region 3
333 East Washington Street
Syracuse, New York 13202

Re: Draft Environmental Impact Statement Comments

Dear Mr. Marquis and Mr. Frechette:

As the oldest minority business in Central New York operating in Albany (1929) and Syracuse, NY (1936), Garland Brothers Funeral Home has a sense of duty and obligation to the people and the communities we serve.

We pride ourselves in being actively engaged in our community. As you know our property on East Fayette Street was taken by eminent domain due to the construction of Interstate 81/Interstate 690 and relocated to Martin Luther King West in 1972. We can see Interstate 81 from our property.

We have lived with the challenges caused by the original construction of Interstate 81 and do not want any decisions going forward to result in adverse impacts to air quality, additional gentrification and increased traffic in our southside neighborhoods. We are worried about the quality of life for our neighborhoods and are concerned that important constituencies have not been listened to and/or heard.

We understand and support the need for change and progress; however it should be done in a way that improves and is beneficial to everyone's lives. To make sure New York State and the federal government understand how residents who live near Interstate 81, within the City of Syracuse, and in the balance of Onondaga of Onondaga County feel about the future of Interstate 81 and some of the

issues associated with it, John Zogby Strategies was engaged to conduct a scientific poll sampling the opinions of local residents.

Enclosed, please find a copy of Survey Memorandum from John Zogby Strategies dated October 12th; based on the field work completed October 3-6th, 2021. The results are clear that only 18% residents who live closest to the Interstate support the community grid alternative. Overwhelmingly over 70% of respondents want the functionally of Interstate 81. My neighbors are more than concerned about increased traffic, air quality, congestion and gentrification.

Given all of the issues and concerns, the state and federal government should stop moving the Draft Environment Impact Statement process forward and engage the community in advancing a project that meets the needs and objectives of all stakeholders.

We do not want the mistakes of the 1950's and 1960's to be replicated again.

Sincerely,

Charles Garland
Garland Brothers Funeral Home

Enclosures

JOHN ZOGBY STRATEGIES

DATA > ANALYZE > REPORT > STRATEGIZE

Date: ***October 12, 2021***
To: ***Charles Garland,***
Garland Brothers Funeral Home
From: ***John, Benjamin, and Jeremy Zogby, Partners***
John Zogby Strategies
Re: ***I-81 Survey***

Methodology and Sample Characteristics

John Zogby Strategies conducted a live telephone survey of 400 adults in both Syracuse (227) and the rest of Onondaga County (173). Of the total calls made, 69% of the completed surveys were landline, 31% of the completed surveys were cell phones. The poll was completed October 3 through 6, 2021.

Analysis

After a decade of planning and public airing, the proposed I-81 plan to remove sections of the interstate, divert traffic to Interstate 481 and other local streets and develop a community grid downtown **has little support among** the general public in the city of Syracuse, both the highest and lowest impact areas within the city, throughout the remainder of Onondaga County, and among both black and white residents. **The preferred choice is to keep I-81 in some way.** The deepest concerns with the proposed plan revolve around concerns about air quality, traffic congestion, potential impact on reaching a hospital in an emergency, businesses leaving Syracuse, and the potential boon for developers that could mean major dislocation of current impact area residents.

Summary of Key Results

1. A majority (55%) of residents reported using I-81 regularly and another 25% said sometimes. It was 58% regularly in Syracuse and 53% the rest of Onondaga county.
2. In the final analysis, *nearly 3 in 4 (72%) favored keeping I-81, while 20% preferred removal.* City residents (69%) favored keeping I-81 almost as much as non-city residents (74%) – and whites more than blacks in the city (73% to 64%). However, the real differences between city/county and whites/blacks are the numbers of undecideds. *Overall, removal is supported by only a small percentage, including 18% in the Impact Area and 27% in the Non-Impact Area.* ***Those who live closest to Interstate 81 want to maintain it.***
3. Overall, when multiple options were presented, *63.3% favored keeping I-81 (via repair, elevated bridge and/or a tunnel), while 25.4% selected the proposed community grid alternative.* Repairing I-81 was the top selection in the I-81 Impact Area by 39% to 20%.
4. Almost 3 in 4 (73%) agreed that *removing I-81 would create congestion* – including 72% of city residents, 74% outside the county, 74% of Syracuse whites, and 68% of Syracuse blacks. Views were similar in the direct and indirect impact areas, with 73% and 69% agreeing, respectively.

JOHN ZOGBY STRATEGIES
DATA > ANALYZE > REPORT > STRATEGIZE

5. A majority of 53% felt that *diverting I-81 traffic to I-481 would lead to businesses leaving Syracuse* while 41% disagreed. The majority was stronger outside the city (57% to 39%) than within the city (49% - 44%). However, there was a stark contrast between Syracuse whites (44% agreed, 47% disagreed) vs. blacks (58% agreed, 37% disagreed).
6. Fifty-seven percent countywide agreed that *removing I-81 would reduce air quality and cause crowded streets*, while 36% disagreed. Syracuse residents felt a little stronger (60% - 32%) than those outside the city (55% - 38%). But the real contrast was between city blacks (74% - 24%) and city whites (53% - 39%), as well as those in the I-81 Impact Area (66%) vs. the Non-Impact Area (52%).
7. About 7 in 10 (69%) felt that without I-81, *it would take more time to get to the hospital in case of an emergency*. The strong sentiment was across the board.
8. Only one in five (19%) agreed that *the proposed grid made them more likely to walk and bicycle* – more so among city residents (30%) than those outside the city (14%) – and twice as many blacks (43%) than whites (23%) in Syracuse.
9. *With new and exciting businesses coming in,* 70% agreed that I-81 should be kept in some way. Only 25% disagreed. The sentiment was across the board, including 73% and 71% in the Impact and Non-Impact Areas.
10. Nearly 3 in 5 (58%) agreed that *the big winners from a new grid would be developers and gentrification of the local neighborhoods*. This sentiment was stronger in the city (62%) than outside (55%) – but particularly more acute among city blacks (78%) than whites (50%), Impact Area (74%) and Non-Impact Area (43%).
11. If the compromise option *a suspension bridge named after Harriet Tubman* is presented, 41% agreed with it and 51% disagreed – 52% - 42% in the city, 36% - 55% rest of county, 47% - 48% among city whites, and 56% - 38% of city blacks.

Sampling Characteristics

Slight weights were applied to some demographics to ensure proper representation of the adult population in the city and the county. The sampling characteristics are as follows:

- Full Onondaga County – 400 adults, including weighting that is representative of the two regions. Thus, 276 Rest of County, 124 Syracuse only. MOE of +/-5 percentage points.
- Rest of County – 173 reside outside the city of Syracuse, MOE, +/-7.6 percentage points.
- Syracuse – 227 reside inside the city of Syracuse, MOE, +/- 6.6 percentage points.
- Syracuse whites – 107, MOE, +/-9.47 percentage points
- Syracuse blacks – 68, MOE, +/- 11.88 percentage points
- Syracuse I-81 Impact Area – 138 living in zip codes -- MOE, +/-8.34 percentage points
    - 13202
    - 13203
    - 13204

JOHN ZOGBY STRATEGIES
DATA > ANALYZE > REPORT > STRATEGIZE

- 13205
- 13207
- 13208
- 13210

- Syracuse I-81 Non-Impact Area – 89 in rest of city, MOE, +/-10.38 percentage points

For a complete set of crosstabulation tables, click here, here, here, and here.

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John Zogby Strategies Live Interview Poll of Onondaga County Adults NYS 10/3/21 - 10/6/21
N=400 Margin of Error = +/- 5.0 percentage points

5. How often do you use Interstate I-81?

	Total		Region: City of Syracuse		Region: Rest of Onondaga		Age Group: 18-29		Age Group: 30-49		Age Group: 50-64		Age Group: 65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Regularly	218	54.5	72	58.0	146	52.9	24	69.2	63	56.3	60	56.0	71	48.5
Sometimes	99	24.8	29	23.6	70	25.4	8	22.3	21	19.1	29	27.1	41	28.1
Rarely	77	19.2	21	17.3	55	20.1	3	8.4	27	24.6	17	15.9	30	20.2
Not sure	6	1.5	1	1.1	4	1.6					1	1.0	5	3.2
Total	400	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Total		Party: Democrat		Party: Republican		Party: Independent/ Other		Party: Not sure		Likely Voter: Yes		Likely Voter: No		Race: White		Race: Black		Race: Hispanic		Race: All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Regularly	218	54.5	79	55.6	66	61.6	67	48.4	5	46.1	184	54.8	34	53.2	160	52.8	26	64.8	12	79.6	20	48.1
Sometimes	99	24.8	29	20.5	24	22.6	45	32.4	1	6.1	90	26.8	9	14.6	79	26.0	6	16.0	3	17.1	11	27.3
Rarely	77	19.2	32	22.6	16	14.6	26	19.0	2	23.8	60	18.0	16	25.8	61	20.1	8	19.2			8	19.5
Not sure	6	1.5	2	1.3	1	1.1	0	.2	2	23.9	2	.5	4	6.4	3	1.1			0	3.2	2	5.1
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

John Zogby Strategies Live Interview Poll of Onondaga County Adults NYS 10/3/21 - 10/6/21
N=400 Margin of Error = +/- 5.0 percentage points

5. How often do you use Interstate I-81?

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Regularly	218	54.5	113	58.8	105	50.6	41	39.6	92	58.6	69	67.8	16	42.7
Sometimes	99	24.8	49	25.7	50	24.0	25	23.8	42	26.5	25	24.8	7	20.4
Rarely	77	19.2	26	13.5	51	24.5	34	32.5	23	14.9	6	6.2	13	36.1
Not sure	6	1.5	4	1.9	2	1.0	4	4.1			1	1.2	0	.8
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

6. Which of the following Interstate-81 plans being discussed publicly by the Department of Transportation do you believ

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Repair the existing Interstate-81	145	36.2	83	38.2	39	39.6	19	25.2	3	50.0	43	34.4	102	37.0	9	24.4	38	34.3	41	38.4	57	39.0
Replace Interstate-81 with a street-level community grid	101	25.4	54	24.9	27	26.9	19	24.4	2	31.4	33	26.3	69	25.0	16	44.6	25	22.1	29	27.3	32	21.8
Remove the Interstate and replace with an underground tunnel	32	8.1	21	9.6	7	7.1	4	5.1	0	5.3	16	12.6	17	6.0	2	5.4	14	12.3	10	9.2	7	4.7
Replace the Interstate with an elevated suspension bridge...	76	19.0	47	21.5	16	16.3	13	16.3	0	8.4	19	15.0	57	20.8	6	15.6	21	18.9	17	15.5	33	22.5
Not sure	45	11.3	13	5.8	10	10.0	22	29.0	0	4.9	14	11.6	31	11.1	4	10.0	14	12.3	10	9.6	18	12.1
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Repair the existing Interstate-81	145	36.2	33	22.8	49	45.5	62	44.3	2	15.6	129	38.4	16	24.7	112	36.7	13	32.3	4	23.2	17	41.1
Replace Interstate-81 with a street-level community grid	101	25.4	62	43.3	13	12.0	23	16.5	4	36.3	90	26.9	11	17.3	74	24.3	11	27.6	6	38.4	11	26.3
Remove the Interstate and replace with an underground tunnel	32	8.1	11	8.0	9	8.4	12	8.5			26	7.9	6	9.1	21	6.9	4	9.0	1	7.0	7	16.0
Replace the Interstate with an elevated suspension bridge...	76	19.0	20	13.7	24	22.3	30	21.3	3	27.1	56	16.6	20	31.9	66	21.6	6	14.5	2	14.9	2	5.8
Not sure	45	11.3	17	12.1	13	11.8	13	9.4	2	21.0	34	10.2	11	17.0	32	10.4	7	16.7	2	16.4	4	10.8
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

6. Which of the following Interstate-81 plans being discussed publicly by the Department of Transportation do you believ

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Repair the existing Interstate-81	145	36.2	62	32.2	83	39.9	49	46.9	50	31.6	38	36.9	9	23.7
Replace Interstate-81 with a street-level community grid	101	25.4	57	29.8	44	21.3	16	15.7	49	31.4	30	29.8	5	14.4
Remove the Interstate and replace with an underground tunnel	32	8.1	19	9.9	13	6.4	8	7.2	16	10.1	7	7.2	1	4.1
Replace the Interstate with an elevated suspension bridge...	76	19.0	41	21.1	36	17.1	19	18.0	31	19.5	22	21.7	5	12.4
Not sure	45	11.3	13	7.0	32	15.3	13	12.1	12	7.3	4	4.4	17	45.4
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

7. Regarding the issue of what to do with Interstate-81, people outside of downtown Syracuse have had their opinions suf

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	110	27.4	69	31.6	18	18.4	21	28.0	1	13.8	29	23.4	81	29.2	13	36.3	31	27.9	26	24.2	40	27.2
Somewhat agree	110	27.4	50	23.1	34	34.1	25	32.9	0	5.3	35	28.3	75	27.0	6	16.9	35	31.9	30	27.8	39	26.3
Somewhat disagree	75	18.8	35	16.2	25	24.8	15	19.9			21	16.9	54	19.7	6	17.9	15	13.6	20	18.6	34	23.1
Strongly disagree	67	16.9	49	22.4	8	8.4	8	10.9	2	31.4	20	16.4	47	17.1	3	7.6	18	16.1	27	25.2	20	13.6
Not sure	38	9.5	14	6.6	14	14.3	6	8.4	3	49.6	19	15.0	19	7.0	8	21.3	12	10.5	4	4.1	14	9.8
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party								Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	110	27.4	50	35.3	30	27.4	26	18.4	4	39.2	95	28.2	15	22.9	84	27.6	13	32.0	1	6.5	12	28.7
Somewhat agree	110	27.4	38	26.8	21	19.3	49	35.5	1	11.9	95	28.3	14	22.6	94	31.0	6	15.4	4	23.4	6	14.3
Somewhat disagree	75	18.8	33	23.1	16	15.0	25	18.1	1	10.0	71	21.1	4	6.9	57	18.8	7	17.8	2	15.4	9	21.4
Strongly disagree	67	16.9	10	7.0	28	25.7	28	19.8	2	20.6	46	13.8	21	33.4	45	14.9	6	15.4	5	34.5	11	26.7
Not sure	38	9.5	11	7.8	14	12.7	11	8.2	2	18.3	29	8.6	9	14.2	24	7.8	8	19.3	3	20.2	4	8.9
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

7. Regarding the issue of what to do with Interstate-81, people outside of downtown Syracuse have had their opinions suf

			Gender				Income							
	Total		Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	110	27.4	48	25.1	61	29.5	21	20.1	44	28.1	36	35.5	8	22.3
Somewhat agree	110	27.4	55	28.4	55	26.5	27	25.9	38	24.0	36	35.3	9	24.3
Somewhat disagree	75	18.8	35	18.2	40	19.4	18	17.2	35	22.1	13	12.8	10	26.2
Strongly disagree	67	16.9	37	19.1	31	14.8	24	22.9	32	20.1	10	9.9	2	5.2
Not sure	38	9.5	18	9.2	20	9.8	14	13.8	9	5.7	7	6.5	8	22.0
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

8. Some say removing Interstate-81 in Syracuse would create congested traffic and negatively impact the city and the reg

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	194	48.5	132	60.5	35	35.2	26	33.6	1	21.2	62	50.2	132	47.7	14	40.9	46	41.7	62	58.2	71	48.4
Somewhat agree	98	24.5	36	16.6	29	29.6	31	39.8	2	31.9	26	21.3	72	25.9	6	16.7	38	33.9	25	23.6	29	19.9
Somewhat disagree	39	9.7	16	7.2	18	17.7	5	6.4	0	5.3	12	9.5	27	9.7	2	5.4	6	5.1	8	7.2	23	16.0
Strongly disagree	61	15.4	31	14.1	15	15.4	13	17.1	2	36.7	20	16.5	41	14.8	12	34.0	21	18.8	11	10.7	17	11.7
Not sure	8	2.0	3	1.5	2	2.1	2	3.0	0	4.9	3	2.5	5	1.8	1	3.0	1	.6	0	.3	6	4.1
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	194	48.5	46	31.9	68	63.0	77	55.3	3	33.9	157	46.5	37	58.8	142	46.8	18	44.9	11	69.5	23	56.8
Somewhat agree	98	24.5	37	26.1	26	24.2	32	22.8	3	30.0	83	24.6	15	24.1	83	27.4	10	24.7	0	3.2	4	10.5
Somewhat disagree	39	9.7	21	14.7	9	8.8	8	5.8			36	10.7	2	3.9	30	9.8	3	6.9	1	7.0	5	12.2
Strongly disagree	61	15.4	36	25.1	4	3.7	18	13.1	3	33.3	55	16.4	6	10.0	43	14.2	9	22.2	3	20.2	6	15.5
Not sure	8	2.0	3	2.3	0	.2	4	3.0	0	2.8	6	1.8	2	3.2	6	1.8	1	1.3			2	4.9
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

8. Some say removing Interstate-81 in Syracuse would create congested traffic and negatively impact the city and the reg

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	194	48.5	94	48.9	100	48.1	58	55.9	79	50.3	43	41.8	14	37.9
Somewhat agree	98	24.5	39	20.1	59	28.6	26	24.5	29	18.6	31	30.3	12	33.7
Somewhat disagree	39	9.7	22	11.4	17	8.0	9	8.2	15	9.8	11	10.5	4	11.0
Strongly disagree	61	15.4	37	19.2	25	11.8	10	9.2	31	19.8	18	17.4	3	7.8
Not sure	8	2.0	1	.3	7	3.5	2	2.2	2	1.4			4	9.7
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

9. Some feel diverting traffic to Interstate-481 could encourage key businesses and services to move out of the City of

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	108	27.1	74	34.2	18	17.9	16	20.7	0	5.3	31	25.4	77	27.9	5	15.5	24	21.4	41	38.3	38	26.1
Somewhat agree	110	27.5	62	28.5	20	20.5	26	34.1	1	23.5	29	23.3	81	29.4	8	21.7	31	28.2	29	26.8	42	28.9
Somewhat disagree	91	22.6	39	17.9	38	38.3	12	15.7	2	26.5	31	25.1	59	21.5	13	37.1	30	27.3	15	14.3	32	21.7
Strongly disagree	72	18.1	36	16.7	15	15.1	19	24.2	2	39.8	24	19.4	48	17.5	6	17.5	22	20.3	20	18.6	24	16.2
Not sure	19	4.7	6	2.8	8	8.3	4	5.3	0	4.9	8	6.8	10	3.7	3	8.2	3	2.9	2	1.9	10	7.1
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	108	27.1	27	18.8	48	44.8	32	23.3	1	9.2	84	25.1	24	38.1	78	25.6	12	29.5	3	19.5	16	39.1
Somewhat agree	110	27.5	39	27.3	19	17.8	47	34.1	4	43.2	92	27.4	18	27.9	88	29.0	12	30.5	2	16.4	7	17.9
Somewhat disagree	91	22.6	38	26.9	19	17.9	32	23.0	1	8.7	81	24.2	9	14.3	73	24.2	8	19.7	4	23.9	6	13.8
Strongly disagree	72	18.1	33	22.8	17	16.1	20	14.6	2	20.2	64	19.1	8	12.6	49	16.3	6	15.6	6	40.1	11	25.9
Not sure	19	4.7	6	4.2	4	3.4	7	5.1	2	18.7	14	4.2	4	7.0	15	5.1	2	4.7			1	3.3
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

9. Some feel diverting traffic to Interstate-481 could encourage key businesses and services to move out of the City of

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	108	27.1	61	31.5	48	23.0	32	30.4	48	30.8	20	19.4	9	23.4
Somewhat agree	110	27.5	53	27.5	57	27.5	30	28.5	36	23.1	30	29.3	14	38.8
Somewhat disagree	91	22.6	39	20.4	51	24.7	18	17.4	42	26.5	27	26.7	4	9.7
Strongly disagree	72	18.1	34	17.8	38	18.3	16	15.0	25	15.8	24	23.5	8	21.8
Not sure	19	4.7	5	2.7	13	6.4	9	8.7	6	3.8	1	1.2	2	6.3
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

10. I have concerns about deteriorated air quality and crowded neighborhood streets for southside residents as a result

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	107	26.7	69	31.4	19	19.0	18	23.5	1	21.2	33	26.3	74	26.8	4	12.6	24	21.3	34	32.1	44	30.2
Somewhat agree	120	30.0	57	26.3	29	29.1	33	43.3	0	8.4	42	34.1	78	28.2	12	35.4	44	39.4	28	25.8	36	24.6
Somewhat disagree	78	19.6	44	20.3	23	22.7	10	12.7	2	28.8	17	13.6	61	22.2	10	28.4	24	21.3	20	18.7	25	16.7
Strongly disagree	65	16.3	37	16.9	15	15.4	11	14.3	2	36.7	23	18.6	42	15.3	6	16.1	17	15.0	19	17.7	24	16.4
Not sure	30	7.4	11	5.0	14	13.8	5	6.2	0	4.9	9	7.3	21	7.5	3	7.4	3	2.9	6	5.7	18	12.1
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	107	26.7	26	18.1	25	23.3	54	38.7	2	18.3	95	28.1	12	19.1	75	24.6	11	27.9	5	31.7	16	38.7
Somewhat agree	120	30.0	55	38.4	33	31.0	28	20.3	4	35.0	102	30.4	18	27.8	94	31.0	17	41.4	7	44.9	2	5.8
Somewhat disagree	78	19.6	31	21.7	16	14.9	31	21.9	1	7.9	62	18.4	16	25.9	67	22.2	2	5.1	0	3.2	8	20.5
Strongly disagree	65	16.3	22	15.4	21	19.9	18	13.1	4	36.0	52	15.6	13	20.4	44	14.6	9	23.0	2	10.1	10	24.8
Not sure	30	7.4	9	6.5	12	11.0	8	6.0	0	2.8	25	7.5	4	6.7	23	7.6	1	2.6	2	10.1	4	10.0
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

10. I have concerns about deteriorated air quality and crowded neighborhood streets for southside residents as a result

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	107	26.7	39	20.1	68	32.7	31	29.3	47	29.7	27	26.5	2	6.4
Somewhat agree	120	30.0	56	29.0	64	30.9	32	30.8	47	30.0	27	26.6	13	36.9
Somewhat disagree	78	19.6	47	24.6	31	14.9	15	14.3	38	24.4	19	18.8	6	16.0
Strongly disagree	65	16.3	43	22.2	23	10.9	14	13.1	17	10.7	25	24.9	9	26.0
Not sure	30	7.4	8	4.1	22	10.5	13	12.5	8	5.2	3	3.1	5	14.7
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

11. Without Interstate-81, in the event of an emergency, I have concerns it will take more time to get to the hospital.

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	216	54.0	140	64.0	41	40.9	33	42.9	3	53.1	62	50.2	154	55.8	10	27.4	62	56.0	67	62.5	78	52.8
Somewhat agree	58	14.5	23	10.5	16	16.1	19	24.2	1	10.7	23	18.6	35	12.7	10	27.4	15	13.5	10	9.1	24	16.2
Somewhat disagree	61	15.3	32	14.9	22	21.8	7	9.1			18	14.2	44	15.8	12	32.7	15	13.8	12	11.3	22	15.1
Strongly disagree	57	14.2	21	9.7	18	18.1	16	20.9	2	31.4	18	14.7	39	14.0	3	9.5	19	16.7	16	15.1	19	12.8
Not sure	8	1.9	2	.9	3	3.1	2	3.0	0	4.9	3	2.2	5	1.8	1	3.0			2	2.0	5	3.1
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	216	54.0	50	34.8	77	71.5	87	62.2	3	26.7	180	53.5	36	56.7	164	53.8	23	56.3	6	39.8	24	58.6
Somewhat agree	58	14.5	32	22.2	8	7.8	14	10.3	4	35.5	46	13.6	12	19.2	45	14.8	6	15.5	3	20.2	4	9.2
Somewhat disagree	61	15.3	28	19.6	10	9.6	23	16.3			57	16.9	4	6.9	50	16.4	7	16.8	2	11.7	3	6.5
Strongly disagree	57	14.2	29	20.2	12	10.8	13	9.3	4	35.0	47	14.1	10	15.0	40	13.1	4	9.8	4	28.3	9	21.7
Not sure	8	1.9	5	3.2	0	.2	3	1.9	0	2.8	6	1.9	1	2.1	5	1.8	1	1.5			2	4.0
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

11. Without Interstate-81, in the event of an emergency, I have concerns it will take more time to get to the hospital.

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	216	54.0	98	51.3	118	56.6	63	60.6	91	57.7	52	50.6	11	29.2
Somewhat agree	58	14.5	25	12.8	33	16.1	14	13.7	18	11.3	9	9.3	17	45.3
Somewhat disagree	61	15.3	37	19.4	24	11.5	12	11.3	25	15.7	22	21.1	3	8.3
Strongly disagree	57	14.2	31	16.3	26	12.3	11	10.2	24	15.3	18	17.4	5	12.4
Not sure	8	1.9	0	.2	7	3.6	4	4.2			2	1.5	2	4.9
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

12. If we remove Interstate-81 and install the community grid, I will be more likely to walk or ride my bike to work or

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	33	8.1	15	6.7	6	6.1	9	12.3	2	39.8	19	15.2	14	5.0	7	18.7	8	6.9	5	4.9	13	8.9
Somewhat agree	43	10.8	20	9.3	16	16.1	7	8.6	0	5.3	18	14.8	25	9.0	14	39.1	7	6.2	10	9.3	13	8.6
Somewhat disagree	44	11.1	21	9.7	15	14.7	7	9.5	1	23.5	19	15.2	25	9.2	1	2.4	11	9.6	15	13.8	18	12.3
Strongly disagree	241	60.2	147	67.3	48	48.4	44	57.8	2	26.5	60	48.2	181	65.6	11	32.4	75	67.7	75	70.3	79	53.9
Not sure	39	9.8	15	6.9	15	14.7	9	11.8	0	4.9	8	6.6	31	11.2	3	7.4	11	9.6	2	1.7	24	16.3
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	33	8.1	14	9.9	6	5.4	9	6.2	4	39.3	17	5.2	15	23.9	18	5.9	9	22.4	0	3.2	5	12.9
Somewhat agree	43	10.8	25	17.8	3	2.6	14	9.9	1	11.0	39	11.4	5	7.3	29	9.4	8	18.9	4	23.4	3	8.5
Somewhat disagree	44	11.1	20	14.0	6	5.9	17	12.3	1	10.0	38	11.2	7	10.3	31	10.3	7	17.6	2	10.8	4	10.7
Strongly disagree	241	60.2	73	51.1	84	77.7	83	59.7	1	8.9	209	62.0	32	50.9	195	64.2	13	33.7	7	49.4	25	60.2
Not sure	39	9.8	10	7.2	9	8.4	17	11.9	3	30.9	34	10.2	5	7.6	31	10.2	3	7.3	2	13.2	3	7.8
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

12. If we remove Interstate-81 and install the community grid, I will be more likely to walk or ride my bike to work or

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	33	8.1	15	7.6	18	8.7	17	16.2	5	3.4	7	7.3	3	7.8
Somewhat agree	43	10.8	31	16.0	12	6.0	11	10.9	20	12.9	9	8.4	3	8.2
Somewhat disagree	44	11.1	27	14.0	17	8.4	11	10.4	18	11.7	12	12.0	3	7.8
Strongly disagree	241	60.2	107	55.9	134	64.2	52	49.6	104	65.9	63	61.4	23	63.0
Not sure	39	9.8	13	6.6	26	12.7	13	12.9	10	6.1	11	11.0	5	13.2
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

13. Some say with new and exciting businesses coming to the area and our population growing, it makes sense to keep Inte

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	191	47.8	112	51.1	46	46.1	32	41.0	3	44.7	54	43.2	138	49.9	9	25.7	50	44.6	56	52.8	76	52.0
Somewhat agree	90	22.4	49	22.3	22	22.2	18	23.6	1	19.1	36	29.1	54	19.4	13	36.5	25	22.1	24	22.4	28	19.3
Somewhat disagree	50	12.5	25	11.7	12	12.2	13	16.4			16	13.0	34	12.3	4	12.5	15	13.2	9	8.9	22	14.7
Strongly disagree	50	12.4	29	13.2	13	13.1	6	7.8	2	31.4	14	11.4	36	12.9	9	25.3	12	10.5	13	11.9	16	11.1
Not sure	19	4.8	4	1.7	6	6.5	9	11.3	0	4.9	4	3.3	15	5.4			11	9.5	4	4.0	4	2.9
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party								Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	191	47.8	44	31.1	63	58.5	81	58.2	3	29.1	156	46.4	35	55.4	147	48.3	18	43.9	4	25.1	23	56.7
Somewhat agree	90	22.4	34	23.6	23	21.0	31	22.4	2	22.4	74	21.9	16	25.2	68	22.5	12	30.1	5	31.5	5	11.2
Somewhat disagree	50	12.5	26	18.2	11	9.8	13	9.7			47	14.0	3	4.6	33	10.9	4	11.2	5	35.3	7	17.2
Strongly disagree	50	12.4	27	19.1	8	7.5	11	7.9	3	32.4	43	12.9	6	9.7	40	13.0	5	11.4			5	13.4
Not sure	19	4.8	11	8.0	4	3.3	3	1.9	2	16.1	16	4.7	3	5.0	16	5.2	1	3.4	1	8.1	1	1.5
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

13. Some say with new and exciting businesses coming to the area and our population growing, it makes sense to keep Inte

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	191	47.8	80	41.9	111	53.4	54	51.3	80	51.2	42	41.2	15	42.1
Somewhat agree	90	22.4	49	25.6	41	19.5	26	25.3	35	22.0	24	23.1	5	14.4
Somewhat disagree	50	12.5	28	14.6	22	10.6	11	10.2	18	11.5	20	19.3	2	4.5
Strongly disagree	50	12.4	32	16.6	18	8.6	11	10.8	19	11.9	15	14.3	5	14.1
Not sure	19	4.8	3	1.4	16	7.9	3	2.5	5	3.4	2	2.0	9	24.9
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

14. There are critics who feel that the community grid-only project, will prove to be a benefit for developers and will

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	118	29.6	77	35.4	19	19.3	20	25.8	2	35.0	45	36.3	73	26.5	8	22.5	30	26.6	38	36.0	42	28.8
Somewhat agree	110	27.5	45	20.5	32	32.2	32	41.5	2	28.8	32	25.7	78	28.3	11	32.6	30	27.0	31	29.4	37	25.4
Somewhat disagree	92	23.0	52	23.7	29	29.2	11	14.8			26	20.6	67	24.1	5	14.2	37	33.2	18	17.2	32	21.6
Strongly disagree	51	12.8	30	13.7	10	9.9	10	12.6	2	31.4	13	10.7	38	13.8	9	25.3	12	10.8	11	10.5	19	13.0
Not sure	28	7.1	15	6.7	9	9.4	4	5.4	0	4.9	8	6.8	20	7.2	2	5.4	3	2.4	7	6.9	16	11.2
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	118	29.6	29	20.5	35	32.9	52	37.4	1	14.7	102	30.2	17	26.3	81	26.5	18	44.2	8	53.1	12	29.1
Somewhat agree	110	27.5	51	35.5	23	21.4	32	23.1	4	41.6	93	27.6	17	27.4	84	27.7	14	34.0	3	20.4	9	22.9
Somewhat disagree	92	23.0	32	22.5	29	26.5	31	22.2	0	4.8	74	22.1	18	27.8	76	25.0	4	10.8	4	23.4	8	20.1
Strongly disagree	51	12.8	22	15.2	10	9.5	16	11.2	4	36.0	44	12.9	8	12.1	40	13.3	3	6.5			8	20.1
Not sure	28	7.1	9	6.3	11	9.8	9	6.1	0	2.8	24	7.2	4	6.4	23	7.5	2	4.6	0	3.1	3	7.8
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

14. There are critics who feel that the community grid-only project, will prove to be a benefit for developers and will

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	118	29.6	52	27.1	66	31.9	35	33.6	41	26.1	34	33.7	8	21.3
Somewhat agree	110	27.5	49	25.6	61	29.3	34	33.0	42	26.6	17	16.8	17	45.7
Somewhat disagree	92	23.0	51	26.4	41	19.9	16	15.8	40	25.5	30	29.6	5	14.3
Strongly disagree	51	12.8	31	16.3	20	9.5	11	10.9	22	14.1	15	14.5	3	7.9
Not sure	28	7.1	9	4.6	20	9.4	7	6.7	12	7.5	6	5.5	4	10.9
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

15. Regarding the future of Interstate-81, which do you prefer?

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Interstate-81, in one form or another, to remain in its...	288	72.0	159	73.0	70	70.9	53	69.3	5	89.8	85	68.9	203	73.5	16	46.7	84	75.3	81	75.7	107	73.0
Interstate-81 to be removed from Syracuse and rerouted to...	82	20.4	46	21.2	25	24.9	11	13.7	0	5.3	26	21.2	56	20.1	12	35.0	17	15.2	24	22.2	29	19.7
Not sure	30	7.5	13	5.8	4	4.1	13	16.9	0	4.9	12	9.9	18	6.4	6	18.3	11	9.5	2	2.1	11	7.3
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Interstate-81, in one form or another, to remain in its...	288	72.0	86	60.0	90	83.9	107	76.9	5	49.5	242	71.8	47	73.4	221	72.9	26	65.7	8	49.8	33	80.5
Interstate-81 to be removed from Syracuse and rerouted to...	82	20.4	41	29.0	13	12.1	26	18.5	2	15.3	73	21.6	9	14.3	63	20.9	6	14.7	6	38.6	7	16.2
Not sure	30	7.5	16	11.0	4	4.0	6	4.6	4	35.2	22	6.6	8	12.4	19	6.3	8	19.5	2	11.7	1	3.3
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

	Gender						Income							
	Total		Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Interstate-81, in one form or another, to remain in its...	288	72.0	128	66.5	161	77.2	82	78.7	115	73.0	69	67.3	23	61.9
Interstate-81 to be removed from Syracuse and rerouted to...	82	20.4	55	28.9	26	12.7	15	13.9	33	20.9	31	30.8	3	8.5
Not sure	30	7.5	9	4.6	21	10.2	8	7.4	10	6.1	2	1.9	11	29.5
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

16. The community and region are best served by replacing Interstate-81 with an elevated suspension bridge, named Harrie

	5. How often do you use Interstate I-81?										Region				Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		Rest of Onondaga		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	60	15.1	45	20.4	8	7.6	8	10.8			23	18.8	37	13.4	7	18.5	18	16.4	17	15.8	19	12.8
Somewhat agree	103	25.9	55	25.4	32	32.3	16	20.2	0	8.4	41	32.9	63	22.7	10	27.5	27	24.7	29	27.5	37	25.1
Somewhat disagree	89	22.4	49	22.4	17	17.6	21	27.9	2	28.8	21	16.9	69	24.8	13	36.5	28	25.0	16	14.9	33	22.4
Strongly disagree	114	28.6	64	29.4	26	26.6	20	26.6	3	57.9	31	25.3	83	30.1	3	9.8	29	26.0	37	34.7	45	30.7
Not sure	32	8.1	5	2.4	16	15.9	11	14.4	0	4.9	8	6.1	25	8.9	3	7.8	9	7.8	8	7.2	13	9.0
Total	400	100.0	218	100.0	99	100.0	77	100.0	6	100.0	124	100.0	276	100.0	35	100.0	111	100.0	107	100.0	147	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	60	15.1	21	15.0	23	21.1	16	11.5	0	2.2	38	11.4	22	34.9	43	14.1	8	20.5	3	19.8	6	15.5
Somewhat agree	103	25.9	40	28.2	20	18.3	40	28.6	4	35.8	87	25.8	16	26.0	79	25.9	13	31.4	5	33.7	7	17.1
Somewhat disagree	89	22.4	39	27.1	25	22.9	25	18.2	1	7.5	79	23.5	10	16.2	76	25.1	7	18.5	3	21.5	2	5.9
Strongly disagree	114	28.6	26	17.9	35	32.4	50	36.0	4	38.4	103	30.7	11	17.4	80	26.3	9	22.5	3	21.9	22	54.1
Not sure	32	8.1	17	11.9	6	5.3	8	5.7	2	16.1	29	8.5	4	5.6	26	8.5	3	7.1	0	3.1	3	7.3
Total	400	100.0	143	100.0	108	100.0	139	100.0	10	100.0	336	100.0	64	100.0	304	100.0	40	100.0	15	100.0	41	100.0

16. The community and region are best served by replacing Interstate-81 with an elevated suspension bridge, named Harrie

			Gender				Income							
	Total		Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	60	15.1	33	17.3	27	13.1	13	12.5	32	20.5	9	8.5	6	17.6
Somewhat agree	103	25.9	46	24.1	57	27.4	28	26.7	40	25.8	31	30.2	4	12.0
Somewhat disagree	89	22.4	46	23.8	44	21.0	22	21.4	40	25.7	19	19.1	7	19.9
Strongly disagree	114	28.6	59	30.9	55	26.5	31	29.6	35	22.4	39	38.0	10	26.1
Not sure	32	8.1	7	3.8	25	12.0	10	9.7	9	5.6	4	4.3	9	24.4
Total	400	100.0	192	100.0	208	100.0	104	100.0	157	100.0	102	100.0	36	100.0

John Zogby Strategies Live Interview Poll of Onondaga County (without Syracuse) Adults NYS 10/3/21 - 10/6/21
N=173 Margin of Error = +/- 7.6 percentage points

5. How often do you use Interstate I-81?

	Total		Party								Gender				Likely Voter			
			Democrat		Republican		Independent/ Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Regularly	92	52.9	27	48.1	35	62.8	29	48.7	1	40.3	50	60.5	41	46.0	81	52.3	11	58.6
Sometimes	44	25.4	11	18.8	12	21.3	21	36.1			19	23.4	24	27.2	42	27.4	2	8.4
Rarely	35	20.1	18	31.6	8	14.5	9	15.2			11	13.7	23	26.0	31	19.8	4	22.3
Not sure	3	1.6	1	1.5	1	1.4			1	59.7	2	2.4	1	.9	1	.5	2	10.8
Total	173	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Total		Age Group								Race								Income							
			18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Regularly	92	52.9	7	100.0	18	50.7	29	56.0	38	48.0	80	52.1	2	100.0	2	100.0	8	50.7	10	28.5	39	57.0	34	65.9	9	47.5
Sometimes	44	25.4			6	18.3	14	27.7	23	29.1	40	25.7					4	28.0	10	27.6	18	25.7	13	25.6	3	18.9
Rarely	35	20.1			11	31.0	8	16.2	15	19.4	33	21.2					2	14.0	13	38.1	12	17.3	4	7.0	6	33.7
Not sure	3	1.6							3	3.5	2	1.1					1	7.3	2	5.8			1	1.5		
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

John Zogby Strategies Live Interview Poll of Onondaga County (without Syracuse) Adults NYS 10/3/21 - 10/6/21
N=173 Margin of Error = +/- 7.6 percentage points

6. Which of the following Interstate-81 plans being discussed publicly by the Department of Transportation do you believe impacts our community most positively?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Repair the existing Interstate-81	64	37.0	36	39.2	18	41.7	8	23.7	2	58.8	10	17.8	25	44.7	29	49.2			26	31.0	38	42.6	58	37.8	6	30.6
Replace Interstate-81 with a street-level community grid	43	25.0	22	23.8	10	23.7	10	28.3	1	41.2	26	46.6	7	11.7	9	14.5	2	100.0	27	31.9	17	18.5	41	26.7	2	10.4
Remove the Interstate and replace with an underground tunnel	10	6.0	6	7.1	3	7.1	1	2.5			2	4.4	3	5.9	5	7.9			7	7.9	4	4.3	10	6.3	1	4.2
Replace the Interstate with an elevated suspension bridge...	36	20.8	23	24.7	8	18.1	5	15.8			9	15.9	14	24.3	14	22.9			19	23.0	17	18.9	28	17.9	8	45.6
Not sure	19	11.1	5	5.2	4	9.4	10	29.7			9	15.2	7	13.4	3	5.5			5	6.2	14	15.7	18	11.4	2	9.3
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Repair the existing Interstate-81	64	37.0	2	22.8	13	35.8	19	37.1	31	38.7	56	36.3	2	86.8			7	42.7	20	59.4	18	25.6	22	42.2	4	23.9
Replace Interstate-81 with a street-level community grid	43	25.0	5	77.2	5	15.4	14	28.1	18	22.9	37	23.9	0	13.2	2	100.0	4	28.7	4	10.5	24	34.3	13	25.7	3	14.6
Remove the Interstate and replace with an underground tunnel	10	6.0			2	5.6	5	10.1	3	4.1	8	5.3					2	14.7	1	2.5	6	9.1	2	4.9	1	4.2
Replace the Interstate with an elevated suspension bridge...	36	20.8			10	27.3	8	15.2	19	23.3	35	22.7					1	7.3	7	20.4	16	22.7	12	22.7	2	9.4
Not sure	19	11.1			6	15.9	5	9.5	9	11.0	18	11.8					1	6.6	2	7.2	6	8.3	2	4.5	9	47.8
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

John Zogby Strategies Live Interview Poll of Onondaga County (without Syracuse) Adults NYS 10/3/21 - 10/6/21
N=173 Margin of Error = +/- 7.6 percentage points

7. Regarding the issue of what to do with Interstate-81, people outside of downtown Syracuse have had their opinions sufficiently heard. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	50	29.2	32	34.5	7	17.1	11	32.8			22	40.0	16	29.5	11	18.3	1	40.3	22	27.1	28	31.1	46	29.5	5	26.4
Somewhat agree	47	27.0	20	21.7	17	38.4	10	28.9			15	27.1	10	17.7	22	36.5			23	28.2	23	26.0	44	28.7	2	13.4
Somewhat disagree	34	19.7	16	17.3	10	23.5	8	22.8			14	24.4	8	13.6	13	21.6			14	17.2	20	22.0	33	21.6	1	4.2
Strongly disagree	30	17.1	21	23.2	3	7.4	4	11.1	1	41.2	2	2.8	14	26.0	12	20.9	1	59.7	18	21.6	12	12.9	21	13.5	9	47.1
Not sure	12	7.0	3	3.3	6	13.5	2	4.4	2	58.8	3	5.7	7	13.2	2	2.7			5	5.9	7	8.0	11	6.8	2	8.8
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	50	29.2	5	77.2	11	30.7	13	24.8	22	27.3	46	29.7	0	13.2			5	29.4	7	21.1	21	30.7	18	34.4	4	23.7
Somewhat agree	47	27.0			12	33.7	14	26.4	21	26.7	45	29.0					2	14.0	9	25.0	16	23.4	19	36.4	3	18.3
Somewhat disagree	34	19.7			7	18.4	9	16.6	19	24.0	30	19.3					4	28.0	6	18.4	15	21.1	7	14.6	6	30.9
Strongly disagree	30	17.1			5	14.3	14	27.6	10	12.9	24	15.8			2	100.0	3	22.0	10	28.5	14	20.2	5	9.6	1	4.7
Not sure	12	7.0	2	22.8	1	2.9	2	4.7	7	9.1	10	6.2	2	86.8			1	6.6	2	7.0	3	4.6	2	4.9	4	22.4
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

8. Some say removing Interstate-81 in Syracuse would create congested traffic and negatively impact the city and the region. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	83	47.7	55	60.5	14	32.2	12	35.1	1	27.9	12	22.1	35	62.2	36	59.9			41	49.5	41	46.1	69	44.9	13	71.6
Somewhat agree	45	25.9	14	15.8	16	36.5	14	39.1	1	30.9	17	30.1	14	26.0	14	22.9			17	20.7	28	30.8	42	26.9	3	18.1
Somewhat disagree	17	9.7	7	7.3	8	19.4	2	4.7			8	15.0	5	9.0	3	5.8			9	10.3	8	9.2	17	10.9		
Strongly disagree	26	14.8	13	14.7	4	10.2	7	18.9	1	41.2	17	30.1	2	2.9	5	8.9	2	100.0	16	19.5	9	10.5	24	15.4	2	10.4
Not sure	3	1.8	2	1.7	1	1.8	1	2.2			2	2.8			2	2.6					3	3.4	3	2.0		
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	83	47.7			13	38.0	31	60.6	38	47.7	72	46.7			2	100.0	9	57.3	20	56.9	34	49.4	23	44.3	6	33.6
Somewhat agree	45	25.9	2	22.8	15	41.3	12	24.1	16	20.6	42	27.4	2	86.8			1	7.3	9	25.9	12	17.5	17	33.3	7	37.7
Somewhat disagree	17	9.7			1	2.9	3	6.5	12	15.6	15	9.6					2	13.3	2	7.0	7	10.6	5	9.7	2	11.3
Strongly disagree	26	14.8	5	77.2	6	17.8	5	8.9	10	12.2	22	14.3	0	13.2			3	22.0	3	8.0	15	21.4	6	12.6	2	8.9
Not sure	3	1.8							3	3.9	3	2.0							1	2.2	1	1.1			2	8.5
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

John Zogby Strategies Live Interview Poll of Onondaga County (without Syracuse) Adults NYS 10/3/21 - 10/6/21
N=173 Margin of Error = +/- 7.6 percentage points

9. Some feel diverting traffic to Interstate-481 could encourage key businesses and services to move out of the City of Syracuse and create problems for you. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	48	27.9	33	36.3	8	18.8	7	19.5			9	16.6	26	46.4	13	22.2			28	33.3	21	22.9	38	24.7	10	54.8
Somewhat agree	51	29.4	26	28.6	11	25.3	13	36.6	1	30.9	16	29.0	9	15.5	25	42.5	1	40.3	25	30.3	26	28.5	45	29.3	6	30.2
Somewhat disagree	37	21.5	16	17.0	17	38.5	4	11.6	1	27.9	16	28.4	9	16.6	12	20.4			14	16.8	23	25.9	36	23.1	2	8.8
Strongly disagree	30	17.5	14	15.6	4	10.2	10	29.8	1	41.2	12	21.9	10	18.7	6	10.8	1	59.7	15	17.6	16	17.4	29	18.8	1	6.2
Not sure	6	3.7	2	2.5	3	7.2	1	2.5			2	4.1	2	2.8	2	4.2			2	2.1	5	5.2	6	4.1		
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	48	27.9			6	17.3	22	43.2	20	25.1	42	27.0					7	42.7	10	29.5	22	31.9	11	21.6	5	27.3
Somewhat agree	51	29.4	2	22.8	11	31.5	14	27.6	24	30.2	46	29.9	2	86.8			3	21.3	10	30.4	19	26.8	15	28.8	7	39.1
Somewhat disagree	37	21.5	5	77.2	10	28.1	5	9.3	17	21.9	36	23.3	0	13.2			1	7.3	5	13.7	18	25.3	14	27.7	1	4.7
Strongly disagree	30	17.5			8	23.1	9	18.4	13	15.8	24	15.6			2	100.0	4	28.7	6	17.3	9	13.6	10	20.4	4	24.7
Not sure	6	3.7					1	1.5	6	7.0	6	4.1							3	9.2	2	2.4	1	1.5	1	4.2
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

10. I have concerns about deteriorated air quality and crowded neighborhood streets for southside residents as a result of removing Interstate-81 and implementing the proposed community grid option. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	46	26.8	29	31.5	9	19.5	8	23.7	1	27.9	8	14.2	14	24.4	25	41.8			17	19.9	30	33.2	43	27.9	3	18.1
Somewhat agree	49	28.2	21	23.2	12	28.3	15	43.4			21	37.6	18	31.9	10	16.7			23	27.9	26	28.5	46	30.0	2	13.0
Somewhat disagree	38	22.2	22	24.2	11	26.0	4	11.6	1	30.9	15	26.1	8	14.8	16	26.3			24	28.4	15	16.6	31	20.0	8	40.9
Strongly disagree	26	15.3	15	16.5	5	11.7	5	14.6	1	41.2	8	13.8	10	18.3	7	11.1	2	100.0	17	20.4	10	10.6	22	14.3	4	23.8
Not sure	13	7.5	4	4.6	6	14.5	2	6.7			5	8.3	6	10.5	2	4.0			3	3.4	10	11.2	12	7.9	1	4.2
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	46	26.8			8	21.3	15	29.5	24	29.8	40	25.8					7	42.7	11	30.6	20	28.9	15	29.5	1	4.2
Somewhat agree	49	28.2			15	41.3	14	27.5	20	25.1	47	30.4	0	13.2	2	100.0			8	23.4	20	29.4	14	27.6	6	34.1
Somewhat disagree	38	22.2	5	77.2	11	29.7	10	19.1	13	16.4	35	22.8					3	21.3	5	15.3	20	28.9	10	20.4	3	15.1
Strongly disagree	26	15.3	2	22.8	3	7.7	9	17.6	13	16.5	20	13.3	2	86.8			4	28.7	5	14.8	5	7.1	11	20.9	6	31.8
Not sure	13	7.5					3	6.3	10	12.1	12	7.6					1	7.3	5	15.9	4	5.7	1	1.5	3	14.8
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

11. Without Interstate-81, in the event of an emergency, I have concerns it will take more time to get to the hospital. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	97	55.8	61	66.5	19	43.9	15	42.2	2	58.8	14	25.0	41	74.0	41	69.6			44	53.3	52	58.1	85	55.0	12	62.3
Somewhat agree	22	12.7	8	8.2	6	12.9	9	25.0			15	25.9	3	5.9	4	6.9			9	10.3	13	14.8	19	12.6	2	13.4
Somewhat disagree	27	15.8	15	16.8	9	21.6	2	6.9			13	23.9	5	9.3	9	14.7			16	19.9	11	12.0	26	16.5	2	9.3
Strongly disagree	24	14.0	7	7.6	8	18.1	8	23.6	1	41.2	12	21.0	6	10.8	4	7.6	2	100.0	14	16.5	10	11.7	21	13.9	3	15.0
Not sure	3	1.8	1	.8	2	3.5	1	2.2			2	4.1			1	1.3					3	3.4	3	2.0		
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	97	55.8	2	22.8	18	51.0	33	64.9	44	54.8	86	55.9	2	86.8			9	57.3	24	68.8	39	55.9	29	56.6	5	28.2
Somewhat agree	22	12.7			5	15.4	4	7.8	12	15.6	21	13.6					1	6.6	2	7.0	7	10.5	3	6.6	9	48.7
Somewhat disagree	27	15.8	5	77.2	5	15.4	5	10.4	11	14.3	26	17.0					1	7.3	3	9.5	12	16.9	12	22.7	1	4.2
Strongly disagree	24	14.0			6	18.3	8	15.4	10	12.3	18	11.6	0	13.2	2	100.0	4	28.7	4	10.3	12	16.7	6	12.6	3	14.6
Not sure	3	1.8					1	1.5	2	2.9	3	2.0							2	4.5			1	1.5	1	4.2
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

12. If we remove Interstate-81 and install the community grid, I will be more likely to walk or ride my bike to work or other activities. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	9	5.0	3	3.0	2	3.5	3	9.1	1	41.2	3	4.7	3	5.7	2	2.7	1	59.7	4	4.5	5	5.4	5	3.2	4	19.6
Somewhat agree	16	9.0	6	6.7	7	16.1	2	6.9			10	18.4	2	2.9	4	6.1			12	14.7	3	3.7	16	10.1		
Somewhat disagree	16	9.2	6	6.3	6	13.1	4	10.4	1	30.9	7	12.3	2	2.9	7	12.6			11	12.7	5	6.0	15	9.8	1	4.6
Strongly disagree	113	65.6	69	75.0	22	49.8	22	63.9	1	27.9	31	56.1	44	79.4	38	63.8			50	60.5	63	70.3	100	64.9	13	71.6
Not sure	19	11.2	8	9.1	8	17.5	3	9.6			5	8.6	5	9.0	9	14.8	1	40.3	6	7.6	13	14.6	19	12.0	1	4.2
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	9	5.0			1	2.4	2	3.2	6	7.7	7	4.7	0	13.2			1	7.3	5	14.8	1	1.2	2	3.6	1	4.2
Somewhat agree	16	9.0	5	77.2			3	6.5	7	9.0	13	8.7					2	14.0	3	9.2	10	13.9	2	3.4	1	5.7
Somewhat disagree	16	9.2					6	11.7	10	12.5	15	9.6					1	7.3	2	4.7	7	9.4	6	12.1	2	8.9
Strongly disagree	113	65.6	2	22.8	29	82.2	40	77.1	43	54.3	100	65.1	2	86.8	2	100.0	10	64.0	20	57.1	47	67.4	34	67.1	13	70.6
Not sure	19	11.2			5	15.4	1	1.5	13	16.5	18	11.8					1	7.3	5	14.2	6	8.1	7	13.7	2	10.5
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

13. Some say with new and exciting businesses coming to the area and our population growing, it makes sense to keep Interstate-81. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	86	49.9	48	52.5	22	50.3	15	42.2	2	58.8	13	23.8	34	60.5	39	66.4			34	40.8	53	58.4	72	46.8	14	76.6
Somewhat agree	34	19.4	19	20.5	9	20.5	6	16.8			12	22.0	11	19.7	10	17.4			20	23.8	14	15.4	32	20.7	2	8.8
Somewhat disagree	21	12.3	9	10.2	5	10.4	7	21.2			12	20.8	5	9.1	5	7.7			13	15.1	9	9.7	21	13.8		
Strongly disagree	22	12.9	15	15.9	4	9.6	2	6.7	1	41.2	12	21.1	4	7.8	4	7.1	2	100.0	15	18.1	7	8.0	20	12.7	3	14.6
Not sure	9	5.4	1	.8	4	9.2	5	13.2			7	12.3	2	2.9	1	1.4			2	2.1	8	8.5	9	6.1		
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	86	49.9			17	48.3	29	55.9	41	51.0	78	50.4					9	56.6	20	59.1	37	53.2	22	43.9	7	37.2
Somewhat agree	34	19.4	2	22.8	7	18.6	10	19.2	16	19.7	31	20.1	2	86.8			1	7.3	6	16.4	13	18.4	13	25.5	2	12.5
Somewhat disagree	21	12.3			5	13.0	5	8.9	12	15.2	16	10.5			2	100.0	3	21.3	2	7.2	9	13.1	9	17.1	1	5.7
Strongly disagree	22	12.9	5	77.2	3	7.2	6	11.2	9	11.2	20	12.8	0	13.2			2	14.7	5	15.0	8	11.9	6	11.9	3	15.2
Not sure	9	5.4			5	13.0	2	4.8	2	2.9	9	6.1							1	2.2	2	3.5	1	1.7	5	29.4
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

14. There are critics who feel that the community grid-only project, will prove to be a benefit for developers and will result in gentrification that will hurt current neighborhood residents. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	46	26.5	29	31.2	7	16.8	9	26.4	1	27.9	6	10.0	18	32.2	22	37.8			19	23.0	27	29.8	42	27.1	4	21.8
Somewhat agree	49	28.3	18	20.1	14	32.1	16	44.9	1	30.9	23	41.8	11	20.6	14	23.7			22	26.6	27	30.0	46	29.6	3	17.6
Somewhat disagree	42	24.1	24	25.8	15	34.0	3	9.1			13	22.3	16	28.1	14	22.8			22	26.7	19	21.7	33	21.5	8	45.6
Strongly disagree	24	13.8	14	15.3	4	8.0	5	14.9	1	41.2	11	19.8	5	9.1	6	9.7	2	100.0	15	18.1	9	9.7	21	13.6	3	15.0
Not sure	13	7.2	7	7.6	4	9.0	2	4.7			3	6.1	6	10.0	4	6.0			5	5.5	8	8.9	13	8.1		
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	46	26.5			7	20.5	17	33.4	21	27.0	41	26.6			2	100.0	3	20.6	9	26.4	14	20.1	19	37.9	4	19.5
Somewhat agree	49	28.3	2	22.8	11	30.7	15	29.5	21	27.0	44	28.6	2	86.8			3	22.0	12	35.7	20	29.5	7	13.4	9	51.8
Somewhat disagree	42	24.1			15	43.5	9	16.7	18	22.3	37	24.2					4	28.7	5	13.7	20	28.6	15	30.0	2	10.4
Strongly disagree	24	13.8	5	77.2	2	5.3	6	11.9	11	13.5	21	13.3					3	21.3	5	14.8	10	14.5	7	13.5	2	9.9
Not sure	13	7.2					4	8.6	8	10.2	11	7.2	0	13.2			1	7.3	3	9.5	5	7.4	3	5.2	2	8.5
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

15. Regarding the future of Interstate-81, which do you prefer?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Interstate-81, in one form or another, to remain in its...	127	73.5	68	74.5	32	73.0	24	69.2	3	100.0	30	54.0	47	85.3	48	81.2	1	59.7	55	66.4	72	80.0	112	72.4	15	82.4
Interstate-81 to be removed from Syracuse and rerouted to..	35	20.1	20	21.9	9	21.6	5	15.1			18	32.0	6	10.4	10	17.4	1	40.3	25	29.5	10	11.4	33	21.5	2	8.8
Not sure	11	6.4	3	3.6	2	5.5	5	15.7			8	14.0	2	4.3	1	1.4			3	4.1	8	8.5	9	6.1	2	8.8
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Interstate-81, in one form or another, to remain in its...	127	73.5	2	22.8	28	79.8	39	76.6	58	72.8	112	72.9	2	86.8			13	85.3	30	85.6	49	71.1	38	74.3	10	57.4
Interstate-81 to be removed from Syracuse and rerouted to..	35	20.1	5	77.2	3	7.2	11	21.7	16	20.1	31	19.8	0	13.2	2	100.0	2	14.7	5	14.4	15	21.7	13	25.7	2	8.9
Not sure	11	6.4			5	13.0	1	1.7	6	7.1	11	7.2									5	7.2			6	33.7
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

16. The community and region are best served by replacing Interstate-81 with an elevated suspension bridge, named Harriet Tubman Freedom Bridge while also developing a vibrant street-level community grid. Do you?

	5. How often do you use Interstate I-81?										Party								Gender				Likely Voter			
	Total		Regularly		Sometimes		Rarely		Not sure		Democrat		Republican		Independent/Other		Not sure		Male		Female		Yes		No	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	23	13.4	18	19.3	2	3.5	4	11.4			6	10.1	11	20.0	6	10.8			14	16.8	9	10.3	15	9.6	8	45.6
Somewhat agree	39	22.7	19	20.8	15	34.7	5	14.3			12	22.0	10	18.1	17	28.4			17	21.0	22	24.3	38	24.4	2	8.8
Somewhat disagree	43	24.8	24	25.9	6	14.7	12	34.4	1	30.9	21	37.0	12	22.2	10	16.6			21	25.8	22	24.0	39	25.1	4	22.3
Strongly disagree	52	30.1	29	32.0	12	28.3	8	24.3	2	69.1	9	15.2	19	33.6	23	38.7	2	100.0	27	32.3	25	28.0	48	30.9	4	23.4
Not sure	15	8.9	2	1.9	8	18.8	5	15.7			9	15.6	3	6.2	3	5.5			3	4.1	12	13.4	15	10.0		
Total	173	100.0	92	100.0	44	100.0	35	100.0	3	100.0	56	100.0	56	100.0	59	100.0	2	100.0	83	100.0	90	100.0	155	100.0	18	100.0

	Age Group										Race								Income							
	Total		18-29		30-49		50-64		65+		White		Black		Hispanic		All Other		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	23	13.4			5	14.3	8	15.1	10	13.1	22	14.3					1	7.3	2	7.0	14	20.2	3	5.4	4	22.1
Somewhat agree	39	22.7			5	15.4	13	24.7	21	26.6	37	24.1					2	14.0	5	15.9	17	25.2	14	28.3	2	10.4
Somewhat disagree	43	24.8	7	100.0	11	30.5	8	15.1	18	22.4	40	26.2	2	86.8			1	7.3	9	26.9	20	29.2	10	20.3	3	17.2
Strongly disagree	52	30.1			10	26.8	19	37.4	23	29.4	40	26.2			2	100.0	10	64.7	13	38.7	13	19.4	21	40.7	5	25.1
Not sure	15	8.9			5	13.0	4	7.8	7	8.6	14	9.2	0	13.2			1	6.6	4	11.5	4	6.1	3	5.3	5	25.2
Total	173	100.0	7	100.0	35	100.0	51	100.0	80	100.0	154	100.0	2	100.0	2	100.0	16	100.0	34	100.0	69	100.0	51	100.0	18	100.0

John Zogby Strategies Live Interview Poll of Syracuse Adults NYS 10/3/21 - 10/6/21
N=227 Margin of Error = +/- 6.6 percentage points

5. How often do you use Interstate I-81?

	Region				Age Group							
	Total		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%
Regularly	132	58.0	132	58.0	26	56.2	62	62.2	25	55.9	19	51.3
Sometimes	54	23.6	54	23.6	14	31.8	20	19.8	11	25.0	8	22.2
Rarely	39	17.3	39	17.3	5	12.0	18	18.0	7	14.7	9	25.1
Not sure	3	1.1	3	1.1					2	4.5	1	1.4
Total	227	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party								Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Regularly	132	58.0	67	68.3	20	56.2	39	47.9	6	48.6	101	61.6	30	48.5	59	55.6	42	62.1	17	75.1	13	44.0
Sometimes	54	23.6	23	23.2	10	28.7	20	24.4	1	8.8	41	25.0	12	20.0	29	27.6	12	17.2	5	21.0	8	26.3
Rarely	39	17.3	7	7.6	5	15.1	22	27.1	4	34.2	21	12.8	18	28.9	17	15.8	14	20.7			8	28.0
Not sure	3	1.1	1	.9			1	.7	1	8.4	1	.5	2	2.7	1	1.1			1	4.0	1	1.8
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

John Zogby Strategies Live Interview Poll of Syracuse Adults NYS 10/3/21 - 10/6/21
N=227 Margin of Error = +/- 6.6 percentage points

5. How often do you use Interstate I-81?

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Regularly	132	58.0	60	55.0	72	60.7	47	51.9	53	62.3	28	75.1	3	24.0
Sometimes	54	23.6	34	31.0	20	16.8	18	19.5	24	28.5	8	21.6	4	26.4
Rarely	39	17.3	14	13.1	25	21.1	24	26.3	8	9.2	1	3.3	6	45.7
Not sure	3	1.1	1	.8	2	1.4	2	2.2					1	3.8
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

6. Which of the following Interstate-81 plans being discussed publicly by the Department of Transportation do you believ

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Repair the existing Interstate-81	78	34.4	48	36.2	19	34.6	11	29.0	1	22.2	78	34.4	11	25.1	33	32.7	19	42.5	15	40.8
Replace Interstate-81 with a street-level community grid	60	26.3	36	27.0	19	34.6	6	14.1			60	26.3	14	30.8	29	29.1	11	24.8	5	14.8
Remove the Interstate and replace with an underground tunnel	29	12.6	20	14.8	4	7.2	5	12.0	1	22.2	29	12.6	3	7.7	19	19.3	3	6.4	3	8.3
Replace the Interstate with an elevated suspension bridge...	34	15.0	20	15.1	7	12.2	7	17.6	1	35.1	34	15.0	10	22.2	10	10.3	7	16.5	6	17.3
Not sure	26	11.6	9	6.9	6	11.4	11	27.2	1	20.4	26	11.6	6	14.2	9	8.6	4	9.9	7	18.9
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party								Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Repair the existing Interstate-81	78	34.4	31	31.2	17	49.3	27	33.7	3	22.3	66	40.0	12	19.6	41	38.5	19	28.2	6	28.4	11	38.6
Replace Interstate-81 with a street-level community grid	60	26.3	37	37.8	5	13.1	17	20.8	1	8.8	45	27.4	15	23.3	28	26.1	20	28.7	6	24.7	7	22.7
Remove the Interstate and replace with an underground tunnel	29	12.6	14	14.1	7	20.2	8	9.6			20	12.3	8	13.4	15	13.9	7	9.6	2	8.6	5	18.1
Replace the Interstate with an elevated suspension bridge...	34	15.0	10	10.1	5	13.3	15	18.0	5	38.8	22	13.2	12	20.0	18	17.3	11	15.5	4	18.2	1	3.4
Not sure	26	11.6	7	6.8	1	4.1	14	17.8	4	30.1	12	7.1	15	23.7	5	4.3	12	17.9	5	20.1	5	17.2
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

6. Which of the following Interstate-81 plans being discussed publicly by the Department of Transportation do you believ

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Repair the existing Interstate-81	78	34.4	38	34.8	40	34.0	30	33.1	39	45.9	6	15.6	3	23.0
Replace Interstate-81 with a street-level community grid	60	26.3	27	25.1	32	27.4	19	21.5	21	24.7	17	46.2	2	13.6
Remove the Interstate and replace with an underground tunnel	29	12.6	15	14.2	13	11.1	11	12.5	11	12.6	6	16.3	0	3.5
Replace the Interstate with an elevated suspension bridge...	34	15.0	19	17.1	16	13.2	14	15.4	10	11.9	7	18.1	3	24.2
Not sure	26	11.6	10	8.8	17	14.3	16	17.6	4	5.0	1	3.8	5	35.8
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

7. Regarding the issue of what to do with Interstate-81, people outside of downtown Syracuse have had their opinions suf

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	53	23.4	34	25.9	12	21.5	6	15.5	1	57.4	53	23.4	9	19.0	25	24.9	10	22.2	10	26.2
Somewhat agree	64	28.3	34	25.8	13	23.6	17	43.3	1	22.2	64	28.3	11	24.1	30	30.1	15	32.6	8	23.1
Somewhat disagree	38	16.9	19	14.1	15	27.8	5	12.2			38	16.9	12	25.4	9	8.7	12	25.5	6	17.8
Strongly disagree	37	16.4	27	20.8	6	10.7	4	10.4			37	16.4	5	10.9	18	17.8	8	17.4	7	18.1
Not sure	34	15.0	18	13.4	9	16.3	7	18.6	1	20.4	34	15.0	9	20.6	18	18.4	1	2.3	5	14.7
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	53	23.4	27	27.4	6	17.6	15	18.6	5	38.7	41	24.8	12	19.8	20	19.1	23	33.4	2	7.9	8	27.7
Somewhat agree	64	28.3	26	26.2	9	26.3	27	33.4	2	17.1	45	27.4	19	30.5	42	39.4	11	16.6	7	28.7	4	14.7
Somewhat disagree	38	16.9	20	20.8	8	21.6	9	10.6	2	14.3	33	19.7	6	9.3	18	16.6	13	19.1	4	18.8	3	11.3
Strongly disagree	37	16.4	14	14.2	8	24.3	14	17.7	0	3.6	24	14.5	13	21.4	11	10.7	11	16.5	5	19.9	10	34.0
Not sure	34	15.0	11	11.4	4	10.2	16	19.7	3	26.3	22	13.6	12	18.9	15	14.2	10	14.3	6	24.7	4	12.4
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

7. Regarding the issue of what to do with Interstate-81, people outside of downtown Syracuse have had their opinions suf

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	53	23.4	23	20.6	31	25.9	17	19.0	19	21.9	15	39.9	2	16.9
Somewhat agree	64	28.3	32	28.9	33	27.7	24	26.9	22	25.5	12	30.9	6	47.8
Somewhat disagree	38	16.9	22	20.5	16	13.6	14	15.8	21	24.4	2	5.4	1	8.1
Strongly disagree	37	16.4	15	13.4	23	19.1	15	16.8	17	19.9	4	10.9	1	6.9
Not sure	34	15.0	18	16.5	16	13.7	19	21.5	7	8.3	5	12.9	3	20.2
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

8. Some say removing Interstate-81 in Syracuse would create congested traffic and negatively impact the city and the reg

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	114	50.2	79	60.4	23	42.3	12	29.9			114	50.2	26	58.3	45	45.4	23	50.4	19	52.9
Somewhat agree	48	21.3	24	18.2	7	13.3	16	41.8	1	35.1	48	21.3	6	14.0	26	26.3	10	22.2	6	15.6
Somewhat disagree	22	9.5	9	7.1	7	13.7	4	10.9	1	22.2	22	9.5	3	7.7	7	7.3	4	9.3	7	18.1
Strongly disagree	38	16.5	17	13.0	15	27.9	5	12.5	1	22.2	38	16.5	7	15.7	20	19.8	8	16.8	3	8.1
Not sure	6	2.5	2	1.3	2	2.8	2	5.0	1	20.4	6	2.5	2	4.3	1	1.2	1	1.3	2	5.3
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	114	50.2	47	48.2	23	67.1	37	45.5	6	48.6	84	51.1	30	47.8	50	47.1	33	48.2	14	62.7	17	56.0
Somewhat agree	48	21.3	19	19.4	6	15.9	18	22.5	6	42.9	30	18.3	18	29.3	29	27.4	14	20.1	1	4.0	5	15.4
Somewhat disagree	22	9.5	14	14.2	3	8.1	5	6.0			17	10.3	5	7.3	11	10.7	5	7.4	2	8.6	3	10.6
Strongly disagree	38	16.5	16	16.7	3	7.6	18	22.1	1	4.4	31	19.1	6	9.7	15	13.8	16	22.8	6	24.7	2	5.5
Not sure	6	2.5	2	1.5	0	1.4	3	3.9	1	4.0	2	1.2	4	5.9	1	1.0	1	1.4			4	12.4
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

8. Some say removing Interstate-81 in Syracuse would create congested traffic and negatively impact the city and the reg

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	114	50.2	52	47.6	62	52.5	50	54.8	45	52.7	12	31.6	7	54.7
Somewhat agree	48	21.3	20	18.8	28	23.6	21	22.9	18	21.4	7	18.3	2	18.2
Somewhat disagree	22	9.5	15	13.9	6	5.5	9	9.6	7	7.7	5	13.4	1	9.5
Strongly disagree	38	16.5	20	18.6	17	14.6	10	10.6	14	16.1	14	36.7	0	3.3
Not sure	6	2.5	1	1.1	4	3.8	2	2.2	2	2.1			2	14.2
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

9. Some feel diverting traffic to Interstate-481 could encourage key businesses and services to move out of the City of

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	58	25.4	39	29.8	8	15.7	9	24.0	1	22.2	58	25.4	10	22.0	26	25.6	10	22.1	12	33.1
Somewhat agree	53	23.3	37	28.2	5	9.1	11	27.4			53	23.3	10	21.3	25	24.7	11	24.3	7	20.3
Somewhat disagree	57	25.1	26	19.7	20	37.6	10	26.3	1	22.2	57	25.1	9	20.2	26	26.5	14	30.9	7	20.2
Strongly disagree	44	19.4	25	19.0	14	26.7	4	9.8	1	35.1	44	19.4	11	24.9	17	17.3	9	19.3	7	18.4
Not sure	16	6.8	4	3.3	6	10.8	5	12.5	1	20.4	16	6.8	5	11.6	6	5.9	2	3.4	3	7.9
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	58	25.4	22	22.6	13	37.3	21	25.6	2	13.2	43	26.1	15	23.6	21	19.4	22	31.7	5	23.8	10	33.7
Somewhat agree	53	23.3	24	24.3	10	28.7	13	16.3	6	44.4	37	22.2	16	26.0	27	24.9	18	26.3	5	20.1	4	12.6
Somewhat disagree	57	25.1	24	24.3	8	23.9	23	28.7	2	12.4	45	27.4	12	19.1	30	27.8	14	20.2	7	29.3	7	23.7
Strongly disagree	44	19.4	24	24.4	1	4.1	18	22.5	0	3.2	33	19.9	11	18.2	20	18.9	11	16.8	6	26.8	6	21.6
Not sure	16	6.8	4	4.4	2	6.1	6	7.0	3	26.8	7	4.5	8	13.1	10	9.0	3	5.0			2	8.4
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

9. Some feel diverting traffic to Interstate-481 could encourage key businesses and services to move out of the City of

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	58	25.4	30	27.7	27	23.3	29	31.5	24	28.1	4	10.6	1	8.1
Somewhat agree	53	23.3	23	21.2	30	25.2	24	26.4	12	14.1	12	31.2	5	37.8
Somewhat disagree	57	25.1	31	28.5	26	22.0	19	21.5	25	29.4	8	22.5	4	29.6
Strongly disagree	44	19.4	20	18.3	24	20.4	11	12.4	18	21.1	13	35.8	1	10.3
Not sure	16	6.8	5	4.3	11	9.2	7	8.2	6	7.2			2	14.2
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

10. I have concerns about deteriorated air quality and crowded neighborhood streets for southside residents as a result

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	60	26.3	41	31.3	10	17.9	9	23.0			60	26.3	8	18.0	21	21.4	19	40.8	12	32.3
Somewhat agree	77	34.1	43	32.7	17	31.0	17	43.0	1	35.1	77	34.1	23	50.4	37	37.4	9	20.3	8	21.6
Somewhat disagree	31	13.6	16	12.5	8	14.9	6	15.4	1	22.2	31	13.6	4	7.8	13	12.6	8	17.5	7	18.8
Strongly disagree	42	18.6	23	17.8	13	24.2	5	13.5	1	22.2	42	18.6	6	13.3	23	22.6	8	18.0	6	15.3
Not sure	17	7.3	8	5.8	6	12.0	2	5.0	1	20.4	17	7.3	5	10.5	6	6.0	2	3.4	4	11.9
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	60	26.3	24	24.6	6	17.8	26	32.1	3	26.2	47	28.7	13	20.1	21	19.7	20	29.9	9	38.7	10	32.7
Somewhat agree	77	34.1	39	39.8	9	27.0	23	27.7	6	50.1	52	31.6	25	40.6	36	33.7	30	43.5	7	32.6	4	14.8
Somewhat disagree	31	13.6	14	14.2	5	15.1	10	12.7	1	11.3	23	14.0	8	12.8	21	19.3	4	5.5	1	4.0	6	19.3
Strongly disagree	42	18.6	18	17.9	9	27.2	14	17.5	1	8.3	31	19.1	11	17.5	21	20.1	12	18.3	3	12.3	6	19.0
Not sure	17	7.3	3	3.5	5	12.9	8	10.0	1	4.0	11	6.7	6	9.0	8	7.3	2	2.8	3	12.3	4	14.2
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

10. I have concerns about deteriorated air quality and crowded neighborhood streets for southside residents as a result

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	60	26.3	22	20.5	37	31.7	25	27.8	27	31.7	6	14.7	2	15.1
Somewhat agree	77	34.1	34	31.5	43	36.4	35	39.1	27	31.5	9	22.8	6	47.8
Somewhat disagree	31	13.6	18	16.1	13	11.3	12	13.2	12	13.7	5	12.4	3	19.6
Strongly disagree	42	18.6	29	26.3	14	11.6	10	11.3	16	19.2	15	40.6	0	3.3
Not sure	17	7.3	6	5.5	11	9.0	8	8.6	3	3.9	4	9.4	2	14.2
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

11. Without Interstate-81, in the event of an emergency, I have concerns it will take more time to get to the hospital.

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	114	50.2	77	58.8	18	33.7	18	44.7	1	35.1	114	50.2	13	29.3	61	61.2	25	54.6	15	40.4
Somewhat agree	42	18.6	20	15.1	13	23.7	9	22.0	1	44.5	42	18.6	18	39.0	11	11.5	6	13.3	7	19.6
Somewhat disagree	32	14.2	15	11.0	12	22.4	6	14.6			32	14.2	6	13.9	12	12.3	6	14.1	7	20.0
Strongly disagree	33	14.7	18	13.9	10	18.1	5	13.7			33	14.7	6	13.5	15	15.0	6	14.3	6	16.0
Not sure	5	2.2	1	1.1	1	2.1	2	5.0	1	20.4	5	2.2	2	4.3			2	3.7	1	4.0
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	114	50.2	50	51.3	21	59.9	38	46.6	5	38.3	82	49.5	32	51.9	48	45.2	37	54.1	11	48.7	18	60.5
Somewhat agree	42	18.6	16	16.0	6	17.0	14	17.4	7	50.9	27	16.5	15	24.2	21	20.1	11	16.7	6	24.7	4	13.1
Somewhat disagree	32	14.2	12	12.4	4	11.2	16	19.9			29	17.7	3	4.9	15	14.2	12	18.0	3	14.3	2	5.2
Strongly disagree	33	14.7	18	18.7	4	10.5	11	13.0	1	6.8	24	14.6	9	15.0	21	19.6	7	9.6	3	12.3	3	11.0
Not sure	5	2.2	2	1.6	0	1.4	3	3.1	1	4.0	3	1.6	2	4.0	1	.9	1	1.7			3	10.3
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

11. Without Interstate-81, in the event of an emergency, I have concerns it will take more time to get to the hospital.

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Strongly agree	114	50.2	51	46.8	63	53.3	47	51.5	53	61.8	10	26.6	4	33.1
Somewhat agree	42	18.6	20	18.5	22	18.8	19	21.1	11	13.2	8	20.4	4	31.9
Somewhat disagree	32	14.2	20	18.3	12	10.4	12	13.4	11	13.1	6	15.1	3	24.2
Strongly disagree	33	14.7	17	15.9	16	13.6	9	10.1	10	11.9	14	36.5	0	3.5
Not sure	5	2.2	1	.5	5	3.9	4	3.9			1	1.5	1	7.3
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

12. If we remove Interstate-81 and install the community grid, I will be more likely to walk or ride my bike to work or

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	35	15.2	19	14.4	7	12.4	8	20.4	1	35.1	35	15.2	12	26.6	12	11.6	5	10.5	6	16.8
Somewhat agree	34	14.8	19	14.6	9	16.1	5	12.9	1	22.2	34	14.8	10	23.0	13	12.6	8	18.5	2	5.8
Somewhat disagree	35	15.2	22	16.6	10	18.5	3	7.2			35	15.2	2	3.4	20	19.5	9	20.8	4	11.2
Strongly disagree	109	48.2	68	51.8	24	45.2	16	42.0	1	22.2	109	48.2	17	36.5	53	52.7	22	47.8	19	51.1
Not sure	15	6.6	3	2.5	4	7.9	7	17.5	1	20.4	15	6.6	5	10.5	4	3.5	1	2.5	5	15.1
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party								Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	35	15.2	18	18.7	1	3.9	11	13.5	4	30.5	17	10.5	17	27.7	12	10.9	16	23.1	1	4.0	6	21.4
Somewhat agree	34	14.8	17	16.9	0	1.2	15	17.9	2	15.7	25	15.2	8	13.6	13	12.3	14	20.3	7	28.7		
Somewhat disagree	35	15.2	16	16.8	7	19.6	9	11.6	2	14.3	25	15.2	10	15.3	14	13.1	13	18.9	3	13.2	5	16.0
Strongly disagree	109	48.2	42	42.9	24	69.6	42	51.1	2	12.7	89	54.0	21	32.9	65	60.5	20	29.8	9	38.1	16	54.3
Not sure	15	6.6	5	4.8	2	5.8	5	5.8	3	26.8	8	5.1	7	10.5	3	3.2	5	7.9	4	16.1	2	8.4
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

12. If we remove Interstate-81 and install the community grid, I will be more likely to walk or ride my bike to work or

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	35	15.2	16	14.5	19	15.9	16	17.9	7	8.5	8	21.8	3	21.7
Somewhat agree	34	14.8	21	18.9	13	11.0	12	12.7	9	10.4	11	28.6	2	18.2
Somewhat disagree	35	15.2	18	16.9	16	13.7	15	16.8	15	17.2	4	11.2	0	3.3
Strongly disagree	109	48.2	50	45.5	60	50.8	37	41.2	53	62.4	14	38.4	4	33.1
Not sure	15	6.6	5	4.3	10	8.7	10	11.5	1	1.6			3	23.7
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

13. Some say with new and exciting businesses coming to the area and our population growing, it makes sense to keep Inte

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	98	43.2	64	48.5	19	36.1	15	37.9			98	43.2	17	36.5	41	40.8	19	42.6	21	58.6
Somewhat agree	66	29.1	34	25.8	14	26.0	16	41.2	2	79.6	66	29.1	19	42.3	26	25.8	15	33.1	6	16.8
Somewhat disagree	29	13.0	19	14.6	9	16.4	2	3.9			29	13.0	8	17.7	13	13.5	4	8.7	4	11.0
Strongly disagree	26	11.4	10	7.7	12	21.5	4	10.7			26	11.4	2	3.4	14	13.9	6	14.2	4	10.9
Not sure	8	3.3	5	3.5			2	6.3	1	20.4	8	3.3			6	6.0	1	1.4	1	2.7
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party								Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	98	43.2	42	43.4	17	49.1	33	40.6	5	41.7	75	45.5	23	37.0	42	39.5	32	47.2	7	30.6	17	56.7
Somewhat agree	66	29.1	26	26.3	9	26.7	27	33.1	4	32.0	42	25.2	25	39.5	35	32.5	18	25.9	9	38.5	5	17.1
Somewhat disagree	29	13.0	14	13.9	5	13.1	11	13.9			24	14.6	5	8.7	13	12.5	8	12.0	5	21.0	3	10.9
Strongly disagree	26	11.4	15	15.8	2	6.2	8	9.6	0	3.2	22	13.6	3	5.5	15	13.9	8	11.2			3	11.3
Not sure	8	3.3	1	.6	2	4.9	2	2.8	3	23.1	2	1.0	6	9.4	2	1.6	2	3.6	2	9.9	1	3.9
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

13. Some say with new and exciting businesses coming to the area and our population growing, it makes sense to keep Inte

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	98	43.2	48	44.2	50	42.3	39	42.5	40	46.5	11	30.5	8	61.5
Somewhat agree	66	29.1	32	29.6	34	28.7	32	35.1	26	30.6	5	14.0	3	21.7
Somewhat disagree	29	13.0	14	13.2	15	12.8	12	13.6	7	7.6	11	28.4		
Strongly disagree	26	11.4	14	13.0	12	9.8	5	6.0	10	11.9	9	23.8	1	9.5
Not sure	8	3.3			8	6.4	2	2.7	3	3.4	1	3.3	1	7.3
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

14. There are critics who feel that the community grid-only project, will prove to be a benefit for developers and will

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	82	36.3	58	44.0	13	25.0	10	24.4	1	57.4	82	36.3	15	32.0	33	32.9	20	44.7	15	40.4
Somewhat agree	58	25.7	28	21.1	17	32.3	13	32.5	1	22.2	58	25.7	17	36.7	23	23.1	13	29.2	5	14.9
Somewhat disagree	47	20.6	26	19.4	10	17.8	12	29.4			47	20.6	9	20.2	23	22.6	9	18.8	6	17.7
Strongly disagree	24	10.7	14	10.6	8	14.3	3	6.5			24	10.7	2	3.4	16	16.5	3	6.1	3	9.4
Not sure	15	6.8	6	4.9	6	10.5	3	7.1	1	20.4	15	6.8	3	7.7	5	5.0	1	1.3	6	17.5
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party								Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	82	36.3	37	38.2	13	36.2	30	36.5	3	21.1	64	38.6	19	30.2	28	26.2	32	47.4	10	42.7	12	42.3
Somewhat agree	58	25.7	24	24.9	9	24.7	18	21.8	8	59.6	36	21.9	22	35.8	25	23.6	20	30.1	6	24.9	7	24.2
Somewhat disagree	47	20.6	22	22.7	7	19.1	17	20.8	1	6.9	39	23.6	8	12.5	30	28.3	8	11.6	7	28.7	2	6.9
Strongly disagree	24	10.7	7	7.5	4	11.2	12	14.6	1	8.3	18	11.1	6	9.6	14	13.2	5	6.9			5	18.2
Not sure	15	6.8	7	6.7	3	8.8	5	6.4	1	4.0	8	4.8	7	11.9	9	8.8	3	3.9	1	3.8	2	8.4
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

14. There are critics who feel that the community grid-only project, will prove to be a benefit for developers and will

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	82	36.3	39	36.0	43	36.5	38	41.5	35	40.5	6	16.7	4	28.5
Somewhat agree	58	25.7	26	23.6	33	27.7	27	30.0	17	19.8	11	30.2	3	21.7
Somewhat disagree	47	20.6	28	25.6	19	15.9	16	18.1	16	18.4	11	28.2	4	29.6
Strongly disagree	24	10.7	13	12.3	11	9.1	6	6.7	11	13.2	7	18.3		
Not sure	15	6.8	3	2.5	13	10.7	3	3.7	7	8.0	2	6.6	3	20.2
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

15. Regarding the future of Interstate-81, which do you prefer?

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Interstate-81, in one form or another, to remain in its...	156	68.9	92	70.0	35	66.1	27	69.7	1	57.4	156	68.9	26	56.8	71	70.6	33	72.8	27	74.4
Interstate-81 to be removed from Syracuse and rerouted to...	48	21.2	26	19.7	18	33.0	4	10.1	1	22.2	48	21.2	8	17.2	23	23.4	11	23.6	6	17.1
Not sure	23	9.9	14	10.3	0	.9	8	20.3	1	20.4	23	9.9	12	26.0	6	6.0	2	3.6	3	8.5
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party										Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Interstate-81, in one form or another, to remain in its...	156	68.9	68	70.0	27	77.1	55	67.8	6	45.1	116	70.2	41	65.6	77	72.5	44	64.2	14	60.8	22	73.0
Interstate-81 to be removed from Syracuse and rerouted to...	48	21.2	24	24.0	7	20.2	17	20.9	1	4.4	36	22.0	12	19.0	27	25.2	10	14.9	6	24.9	5	18.6
Not sure	23	9.9	6	6.0	1	2.7	9	11.3	7	50.5	13	7.8	10	15.4	3	2.3	14	21.0	3	14.3	2	8.4
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

	Gender						Income							
	Total		Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%	ƒ	%
Interstate-81, in one form or another, to remain in its...	156	68.9	73	66.8	84	70.8	64	71.1	66	77.6	15	39.5	11	79.7
Interstate-81 to be removed from Syracuse and rerouted to...	48	21.2	30	27.5	18	15.4	12	13.3	16	18.8	19	51.1	1	6.9
Not sure	23	9.9	6	5.7	16	13.8	14	15.6	3	3.6	4	9.5	2	13.3
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

16. The community and region are best served by replacing Interstate-81 with an elevated suspension bridge, named Harrie

	5. How often do you use Interstate I-81?										Region		Age Group							
	Total		Regularly		Sometimes		Rarely		Not sure		City of Syracuse		18-29		30-49		50-64		65+	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	43	18.8	30	22.6	9	17.3	4	9.3			43	18.8	12	26.3	19	18.6	8	18.1	4	10.9
Somewhat agree	75	32.9	46	34.6	14	26.6	14	35.6	1	35.1	75	32.9	18	39.2	34	34.5	17	36.6	6	16.0
Somewhat disagree	38	16.9	20	15.4	13	24.6	4	11.0	1	22.2	38	16.9	4	9.6	19	19.3	6	14.3	8	22.5
Strongly disagree	57	25.3	32	24.2	12	22.6	13	32.8	1	22.2	57	25.3	6	13.9	25	25.1	12	26.0	14	39.2
Not sure	14	6.1	4	3.2	5	8.8	4	11.3	1	20.4	14	6.1	5	11.1	2	2.5	2	5.0	4	11.4
Total	227	100.0	132	100.0	54	100.0	39	100.0	3	100.0	227	100.0	45	100.0	100	100.0	45	100.0	36	100.0

	Party								Likely Voter				Race							
	Total		Democrat		Republican		Independent/ Other		Not sure		Yes		No		White		Black		Hispanic		All Other	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	43	18.8	23	23.1	9	26.2	11	13.0	0	3.2	27	16.3	16	25.6	14	13.1	15	22.0	5	24.2	8	28.2
Somewhat agree	75	32.9	38	38.6	7	19.2	24	28.9	7	51.4	49	29.9	25	40.8	36	33.6	23	33.8	9	41.2	6	22.0
Somewhat disagree	38	16.9	10	10.5	9	26.2	18	21.5	1	10.7	31	19.1	7	11.0	22	20.7	9	13.4	6	26.2	1	3.7
Strongly disagree	57	25.3	22	22.3	9	27.1	25	30.3	2	11.7	50	30.3	8	12.2	29	27.0	16	24.2	1	4.6	11	37.8
Not sure	14	6.1	5	5.5	0	1.4	5	6.2	3	23.1	7	4.5	6	10.4	6	5.7	5	6.7	1	3.8	2	8.4
Total	227	100.0	98	100.0	35	100.0	81	100.0	13	100.0	165	100.0	62	100.0	107	100.0	68	100.0	23	100.0	30	100.0

16. The community and region are best served by replacing Interstate-81 with an elevated suspension bridge, named Harrie

	Total		Gender				Income							
			Male		Female		Less than $50,000		$50,001-$100,000		more than $100,000		Refuse	
	f	%	f	%	f	%	f	%	f	%	f	%	f	%
Strongly agree	43	18.8	20	18.4	23	19.2	17	18.7	18	21.2	8	20.5		
Somewhat agree	75	32.9	34	31.2	41	34.4	35	38.6	23	27.1	14	37.5	2	18.2
Somewhat disagree	38	16.9	21	19.4	17	14.5	14	15.3	15	17.4	5	14.4	4	30.8
Strongly disagree	57	25.3	30	27.7	27	23.1	18	19.6	25	29.7	10	27.6	4	29.8
Not sure	14	6.1	3	3.2	10	8.8	7	7.8	4	4.6			3	21.2
Total	227	100.0	109	100.0	118	100.0	91	100.0	85	100.0	37	100.0	14	100.0

John Zogby Strategies Live Interview Poll of Syracuse Adults NYS 10/3/21 - 10/6/21
N=227 Margin of Error = +/- 6.6 percentage points

2. Registered

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Yes	194	85.5	128	92.8	66	74.1
No	28	12.4	8	6.0	20	22.4
Not sure	5	2.1	2	1.2	3	3.4
Total	227	100.0	138	100.0	89	100.0

3. Likely to vote

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Definitely	94	41.4	64	46.6	30	33.5
Very likely	45	19.7	28	19.9	17	19.4
Somewhat likely	41	18.2	22	15.8	19	21.8
Not likely	43	18.8	20	14.6	23	25.3
Not sure	4	1.9	4	3.1		
Total	227	100.0	138	100.0	89	100.0

John Zogby Strategies Live Interview Poll of Syracuse Adults NYS 10/3/21 - 10/6/21
N=227 Margin of Error = +/- 6.6 percentage points

4. Party

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Democrat	98	43.1	62	44.7	36	40.6
Republican	35	15.3	19	14.0	15	17.4
Independent/Other	81	35.9	47	34.4	34	38.2
Not sure	13	5.7	10	6.9	3	3.8
Total	227	100.0	138	100.0	89	100.0

5. How often do you use Interstate I-81?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Regularly	132	58.0	85	61.3	47	52.8
Sometimes	54	23.6	28	20.2	26	29.0
Rarely	39	17.3	24	17.4	15	17.0
Not sure	3	1.1	1	1.1	1	1.2
Total	227	100.0	138	100.0	89	100.0

6. Which of the following Interstate-81 plans being discussed publicly by the Department of Transportation do you believe impacts our community most positively?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Repair the existing Interstate-81	78	34.4	54	38.8	25	27.6
Replace Interstate-81 with a street-level community grid	60	26.3	28	20.1	32	35.8
Remove the Interstate and replace with an underground tunnel	29	12.6	19	14.0	9	10.5
Replace the Interstate with an elevated suspension bridge...	34	15.0	20	14.9	14	15.3
Not sure	26	11.6	17	12.2	10	10.7
Total	227	100.0	138	100.0	89	100.0

7. Regarding the issue of what to do with Interstate-81, people outside of downtown Syracuse have had their opinions sufficiently heard. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	53	23.4	39	28.2	14	16.0
Somewhat agree	64	28.3	33	23.7	32	35.4
Somewhat disagree	38	16.9	22	16.2	16	18.0
Strongly disagree	37	16.4	26	18.9	11	12.5
Not sure	34	15.0	18	13.1	16	18.1
Total	227	100.0	138	100.0	89	100.0

8. Some say removing Interstate-81 in Syracuse would create congested traffic and negatively impact the city and the region. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	114	50.2	73	53.0	41	45.8
Somewhat agree	48	21.3	27	19.8	21	23.6
Somewhat disagree	22	9.5	15	10.6	7	7.8
Strongly disagree	38	16.5	19	14.0	18	20.4
Not sure	6	2.5	3	2.5	2	2.4
Total	227	100.0	138	100.0	89	100.0

9. Some feel diverting traffic to Interstate-481 could encourage key businesses and services to move out of the City of Syracuse and create problems for you. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	58	25.4	40	29.2	17	19.5
Somewhat agree	53	23.3	28	20.5	25	27.6
Somewhat disagree	57	25.1	32	23.0	25	28.4
Strongly disagree	44	19.4	29	20.9	15	17.1
Not sure	16	6.8	9	6.5	7	7.4
Total	227	100.0	138	100.0	89	100.0

10. I have concerns about deteriorated air quality and crowded neighborhood streets for southside residents as a result of removing Interstate-81 and implementing the proposed community grid option. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	60	26.3	45	33.0	14	16.1
Somewhat agree	77	34.1	45	33.0	32	35.8
Somewhat disagree	31	13.6	16	11.3	15	17.2
Strongly disagree	42	18.6	23	16.8	19	21.4
Not sure	17	7.3	8	5.9	8	9.5
Total	227	100.0	138	100.0	89	100.0

11. Without Interstate-81, in the event of an emergency, I have concerns it will take more time to get to the hospital. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	114	50.2	72	52.1	42	47.2
Somewhat agree	42	18.6	26	18.9	16	18.3
Somewhat disagree	32	14.2	21	15.1	11	12.8
Strongly disagree	33	14.7	16	11.3	18	20.0
Not sure	5	2.2	4	2.6	2	1.7
Total	227	100.0	138	100.0	89	100.0

12. If we remove Interstate-81 and install the community grid, I will be more likely to walk or ride my bike to work or other activities. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	35	15.2	23	16.5	12	13.2
Somewhat agree	34	14.8	20	14.3	14	15.5
Somewhat disagree	35	15.2	19	13.9	15	17.3
Strongly disagree	109	48.2	67	48.8	42	47.3
Not sure	15	6.6	9	6.5	6	6.7
Total	227	100.0	138	100.0	89	100.0

13. Some say with new and exciting businesses coming to the area and our population growing, it makes sense to keep Interstate-81. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	98	43.2	64	46.1	34	38.6
Somewhat agree	66	29.1	38	27.2	29	32.0
Somewhat disagree	29	13.0	17	12.6	12	13.6
Strongly disagree	26	11.4	14	10.1	12	13.3
Not sure	8	3.3	5	3.9	2	2.5
Total	227	100.0	138	100.0	89	100.0

14. There are critics who feel that the community grid-only project, will prove to be a benefit for developers and will result in gentrification that will hurt current neighborhood residents. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	82	36.3	61	44.2	21	24.1
Somewhat agree	58	25.7	42	30.2	17	18.8
Somewhat disagree	47	20.6	19	13.5	28	31.5
Strongly disagree	24	10.7	9	6.8	15	16.7
Not sure	15	6.8	7	5.4	8	8.9
Total	227	100.0	138	100.0	89	100.0

15. Regarding the future of Interstate-81, which do you prefer?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Interstate-81, in one form or another, to remain in its...	156	68.9	94	68.0	63	70.3
Interstate-81 to be removed from Syracuse and rerouted to..	48	21.2	25	17.8	24	26.5
Not sure	23	9.9	20	14.2	3	3.2
Total	227	100.0	138	100.0	89	100.0

16. The community and region are best served by replacing Interstate-81 with an elevated suspension bridge, named Harriet Tubman Freedom Bridge while also developing a vibrant street-level community grid. Do you?

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Strongly agree	43	18.8	28	20.1	15	16.8
Somewhat agree	75	32.9	42	30.8	32	36.1
Somewhat disagree	38	16.9	21	15.6	17	18.9
Strongly disagree	57	25.3	37	26.6	21	23.3
Not sure	14	6.1	9	6.9	4	5.0
Total	227	100.0	138	100.0	89	100.0

17. Likely Voter	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Yes	165	72.5	106	76.9	59	65.8
No	62	27.5	32	23.1	30	34.2
Total	227	100.0	138	100.0	89	100.0

801. Age Group

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
18-29	45	20.0	24	17.3	22	24.2
30-49	100	44.0	60	43.8	39	44.3
50-64	45	20.0	31	22.6	14	15.9
65+	36	16.0	22	16.3	14	15.5
Total	227	100.0	138	100.0	89	100.0

901. Age GroupB

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
18-24	28	12.2	15	11.2	12	13.7
25-34	48	21.3	27	19.8	21	23.8
35-54	78	34.5	49	35.2	30	33.4
55-69	50	22.2	34	24.5	16	18.5
70+	22	9.9	13	9.3	10	10.7
Total	227	100.0	138	100.0	89	100.0

904. Race

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
White	107	47.0	49	35.5	58	64.9
Black	68	30.0	58	41.8	10	11.7
Hispanic	23	10.0	13	9.7	9	10.4
All Other	30	13.0	18	13.0	12	13.0
Total	227	100.0	138	100.0	89	100.0

921. Income

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Less than $50,000	91	39.9	60	43.8	30	33.9
$50,001-$100,000	85	37.6	48	35.0	37	41.8
more than $100,000	37	16.5	22	15.6	16	17.8
Refuse	14	6.0	8	5.6	6	6.5
Total	227	100.0	138	100.0	89	100.0

922. Gender

	Total		Region: Near Interstate 81		Region: Rest of Syracuse	
	f	%	f	%	f	%
Male	109	48.0	55	39.8	54	60.7
Female	118	52.0	83	60.2	35	39.3
Transgender/Non-binary/Other						
Total	227	100.0	138	100.0	89	100.0

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Subject:	FW: Interstate 81
Date:	Thursday, October 14, 2021 4:40:23 PM
Attachments:	2021 10 14 Garland to CEQ EPA NEPA RE I81.pdf

Fyi. Comment.

From: garland17916@gmail.com <garland17916@gmail.com>
Sent: Thursday, October 14, 2021 4:25 PM
To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>
Subject: FW: Interstate 81

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Please see attached.

Charles E. Garland, Mgr.
Garland Bros. Funeral Home
143 Martin Luther King West
Syracuse, NY 13205
Phone: 315-475-0285
Fax: 315-475-0655
Email: garland.bros@verizon.net

From: garland17916@gmail.com <garland17916@gmail.com>
Sent: Thursday, October 14, 2021 4:22 PM
To: Brenda.mallory@ceg.eop.gov; Regan.Michael@epa.gov; Jomar.MaldonadoVazquez@ceq.eop.gov; Joe_Nehme@schumer.senate.gov; johnkatkony24@mail.house.gov; Tristan.Southard@mail.house.gov; grace_bobertz@gillibrand.senate.gov
Cc: 'garland.bros' <garland.bros@verizon.net>
Subject: Interstate 81

Please see the attached. Look forward to following up with you.

Charles E. Garland, Mgr.
Garland Bros. Funeral Home
143 Martin Luther King West
Syracuse, NY 13205
Phone: 315-475-0285
Fax: 315-475-0655
Email: garland.bros@verizon.net

Benjamin H. Garland, Jr., L.F.D., President
Charles E. Garland, L.F.D., Mgr. **Garland Bros. Funeral Home** **Lula M. Garland, L.F.D.**
Anjela D. Garland, L.F.D.

Providing Quality Service at a Reasonable Price Since 1929

October 14, 2021

Brenda Mallory, Chair
White House Council on Environmental Quality
Executive Office of the President
1650 Pennsylvania Avenue
Washington, DC 20501
Brenda.mallory@ceg.eop.gov

Michael S. Regan, EPA Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W., Mail Code 1101A
Washington, DC 20460
Regan.Michael@epa.gov

Jomar Maldonado, Director
National Environmental Policy Act
730 Jackson Place, N.W.
Washington, DC 20503
Jomar.MaldonadoVazquez@ceq.eop.gov

Re: New York State Department of Transportation
Draft Environment Impact Statement for Interstate 81

Dear Chair Mallory, Administrator Regan and Director Maldonado:

As you may be aware, the New York State Department of Transportation ("NYSDOT") released a Draft Environmental Impact Statement ("DEIS") in July 2021 for a project in Syracuse, New York related to Interstate 81. The purpose of this communication is to request your help in thoroughly reviewing the project, specifically the preferred alternative ("Community Grid") which includes removing an elevated section of Interstate 81 and its impact on our community. We are concerned that as a stand-alone project the Community Grid would have adverse impacts on our neighborhood, affecting our health and quality of life, as a result of thousands of vehicles traveling along neighborhood streets.

By way of background, Garland Brothers Funeral Home is the oldest minority business in Central New York operating in Albany (1929) and Syracuse, NY (1936), Garland Brothers Funeral Home has a sense of duty and obligation to the people and the communities we serve.

We pride ourselves in being actively engaged in our community. Our property was previously taken by eminent domain and relocated to Martin Luther King West in 1972. We can see Interstate 81 from our property. It is clear that when the Interstate was constructed many decades ago it impacted and divided our neighborhood.

Health statistics for our neighborhood and more specifically African-Americans are both concerning and alarming. Many of these were highlighted in an August 13, 2020 Syracuse.com article https://www.syracuse.com/coronavirus/2020/08/how-a-pandemic-laid-bare-cnys-health-crisis.html:

- Hospitalizations for asthma patients are 3.7 times higher than the balance of the population
- Life expectancy for southside residents ranges between 69.5 to 72.6 years; which is nearly twenty percent younger than some of the residents who live elsewhere in Onondaga County.

We do not want these statistics to worsen as a result of the pending decision and subsequent actions by the NYSDOT and know the Environmental Protection Agency and President Biden would agree that our neighborhood should not be hurt in any way as a result of $2+ billion federally funded project.

The publically available data includes information that has us concerned about the diverted traffic making their way downtown and to other points north and south of where we live. The DEIS includes Interstate 81 at a roundabout next to an elementary school and thousands of new vehicles on roadways that run north and south in our neighborhood.

We wholeheartedly believe positive steps can be taken to reconnect and invest in communities that were divided by the construction of Interstate Highways; however bringing highway traffic to local roads would introduce more air pollution, toxic carcinogens and volatile organic compounds, back into our community, negatively affecting our air quality, quality of life and life expectancy.

We know the Environmental Protection Agency ("EPA") has a legal requirement to review the DEIS, that stringent NEPA regulations need to be followed and the Biden administration has strong environmental objectives and goals released earlier this year; which is the reason for this letter. Working together, we can advance a project that helps and protects our neighborhood and the surrounding area.

Attached, please find a copy of a letter sent to President Biden on August 24, 2021 from the family of Harriet Tubman on how we could have all the benefits of the community grid; while protecting our health and safety and paying tribute to an American Icon with the Harriet Tubman Memorial Freedom Bridge. This approach could help our neighborhood build back better.

We have spent countless hours reviewing the 28,000 pages of documents that were released three months ago and are very concerned about the mistakes of the 1950's and 1960's being replicated again. We would be more than happy to host you and your colleagues to meet with us in Syracuse and experience what we are concerned about and what the opportunities are.

Thank you in advance in your consideration.

Sincerely,

Charles E. Garland

Charles Garland
Garland Brothers Funeral Home

Attachment

Cc: Senator Charles Schumer
Senator Kirsten Gillibrand
Congressman John Katko

The Relatives of Harriet Tubman

August 24, 2021

Honorable Joe Biden, President
United States of America
The White House
1600 Pennsylvania Avenue, NW
Washington DC 20500
Re: Interstate 81 - Reconnecting Communities

Dear President Biden

After surviving 2020, the Covid Pandemic, and what can be deemed a biological and psychological war, where we have seen 201 million people affected, 4.2 million deaths, global, national and local economies destroyed, the world, America, Central New York and Syracuse, are once again facing uncertainty and fear as we anticipate dealing with the new Covid Delta Variant.

As you are aware, Central New York is looking at the largest construction and development projects most of us will see in our lifetime. The future of Interstate 81 in Syracuse's urban core is critically important as it has been historically inhabited by African Americans and low-income individuals and families, reminiscent of the urban renewal policies of the 1960's and the destruction the old Syracuse 15th Ward and a once thriving community.

Right now, to replace the portion of I-81 that runs through Pioneer Homes, Central Village and McKinney Manor, the option being proposed by the New York State Department of Transportation ("NYSDOT"), is what is being called "The Grid", which is simply, "A Road" that is based on an outdated 2008 report that we feel does not apply in today's social, political and economic climate of hopelessness, fear and uncertainty and definitely does not address the need for hope and inspiration, that the community and Central New York needs right now.

We, the family of Harriet Tubman, feel that the symbol of pride, hope and inspiration the people of Central New York and Syracuse need and deserve can be found in supplementing "The Grid" with the Harriet Tubman Memorial Freedom Bridge ("HTMFB"). We strongly endorse it. We feel it will be a symbol of hope and inspiration for the world to see: a symbol that reconciles our past, present and future; a testament to our ancestor and American icon, Harriet Tubman -- the renowned abolitionist and political activist, who lived and died in Central New York and exemplified our American values of courage, freedom and perseverance.

The Harriet Tubman Memorial Freedom Bridge will be a marvelous structure and symbol of pride for the people of Central New York and Syracuse; a work of art and beacon of hope and inspiration for the world to see, stretching up to the North Star, brilliantly lighting the way to our neighbor and at one time, a destination for freedom, Canada. This is what the people of Central New York and Syracuse need now, in this time: a symbol of hope and inspiration, not just a "Grid", a testimony to our community's strength, courage and perseverance.

With your help and support, we will achieve everyone's goal of both reconnecting and redevelopment of Syracuse's urban core; while having a living tribute to an American icon. We see a comprehensive project that can be a real draw and connection for national and international visitors and welcomed tourism to the Harriet Tubman House and Complex in Cayuga County. The Harriet Tubman Memorial Bridge will be a true gateway initiating from a refurbished African American neighborhood to the social justice trail through the Finger Lakes. The Southside of Syracuse could have its own welcoming events around Juneteenth. The HTMB will enhance a tourism site that is growing in Auburn.

Now is the time to do this correctly. We appreciate your consideration.

Sincerely,

The Relatives of Harriet Tubman

Print PAULINE COPES JOHNSON Signature Pauline Copes Johnson
Pauline Copes Johnson - Family Matriarch

Print Deidre Johnson Stanford Signature Deidre Johnson Stanford

Print GARETH LEE JOHNSON Signature Gareth Lee Johnson

Print Kevin L. Johnson Signature Kevin L. Johns

Print Keyonna Long Signature Keyonna Long

Print Keyarra Long Signature Keyarra Long

Print Charisse Mead Signature Charisse Mead

Print Thomas Stanford Signature Thomas Stanford

Print Deanna Walz Signature Deanna Walz

Print Channie M. Myers Signature Channie M Myers

Print Karen JohnsonWalker Signature Karen JohnsonWalker

Print MiltonC. Walker III Signature MiltonC Walker III

Print Teia Hawkins Signature Teia Hawkins

Print Marquis Taylor Signature

Print Cameron Taylor Signature

Print Delvonte Copes Signature

Print Curtis Hawkins Signature

Print Damir Lacoste Signature

Print Edward Copes Signature

Print Edward Copes JR Signature

Print Makailah Lacoste Signature

Print Devon Copes Signature

Print Destiney Copes Signature

Print Shayne Copes Signature

Print Devyanna Gardner Signature

Print Leniyah Gardner Signature

Print Maxine E. Wilson Signature

Print Brenda Wilson Signature

Print Myrisha Logan Signature

Print Markala Logan Signature

Print Marcus Logan 2nd Signature 2nd

Cc: Secretary Pete Buttigieg, US Department of Transportation
Senator Charles Schumer
Senator Kirsten Gilibrand
Congressman John Katko
Governor Kathy Hochul
Charles Small, Deputy Assistant Secretary Intergovernmental Affairs, USDOT
Commissioner Marie Therese Dominguez, NYSDOT
Assemblyman William Magnarelli, Chair of Transportation Committee

Print CHARLEI BARNES Signature Charlei Barnes

Print SHAHEEN DAVIS Signature Shaheen Davis

Print TEESHA BARNES Signature Teesha Barnes

Print LASHONDA BARNES Signature La Shonda Barnes

Print JAYVON WHITTICO Signature Jayvon Whitico

Print CHRISTEER MARTINEL Signature Christeer Martinez

Print AMARI NKWNSEI Signature Amari Kwansei

Print JEREMIA Mc GRIFF Signature Jeremia Mc Griff

Print MiHon Walker IV Signature Milton Walker IV

Print TIFFANY FORD Signature Tiffany Ford

Print JERRAD FORD Signature Jerrad Ford

Print CHERYL FORD Signature Cheryl Ford

Print DWANA JOHNSON Signature Dwana Johnson

Print CUTHER JOHNSON Signature Cutter Johnson

Print TERRENCE WOLFORD Signature Terrence Wolford

Print Otis Johnson Signature Otis Johnson

Print QUENTIN JOHNSON Signature Quentin Johnson

Print KATHLEEN JONES Signature Kathleen Jones

Print KEVIN JOHNSON JR. Signature Kevin Johnson Jr.

Print KEVONAH L. JOHNSON Signature Kevonah L. Johnson

Print KELIA JOHNSON Signature Kelia Johnson

Print TAMARA THOMAS Signature Tamara Thomas

Print Lee Brooks Jr Signature Lee Brooks Jr

Print A'Donis Brooks Signature A'Donis Brooks

Print Antonio Owens Signature Antonio Owens

Print Shalonda Young Signature Shalonda Young

Print Cherlyn Johnson Signature Cherlyn Johnson

Print Jimmie Armstead Signature Jimmie Armstead

Print Shawndell Johnson Signature Shawndell Johnson

Print Albert William Signature Albert William

Print Shalea Williams Signature Shalea Williams

Print Mary Williams Signature Mary Williams

Print Kenya Armstead Signature Kenya Armstead

Print Mike Brooks Signature Mike Brooks

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Print Damon Brooks Signature Damon Brooks

Print Brenton Walker Signature Brenton Walker

Print Jason Walker Signature Jason Walker

Print Shannon Walker Signature Shannon Walker

Print Tierney L. Nicolella-Johnson Signature Tierney L. Nicolella-Johnson

Print Alejandro L. Sims Signature Alejandro L. Sims

Print Aurora L. Sims Signature Aurora L. Sims

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Print Kelly Long Signature Kelly Long

Print Zanadia Long Signature Zanadia Long

Print Syneetah Long Signature Syneetah Long

Print Lycariah Long Signature Lycariah Long

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Print Zanihah Pitts Signature Zanihah Pitts

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Print Leslie Walker Signature Leslie Walker

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Print FREDERICK THOMAS, JR Signature Frederick Thomas Jr.

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September 10, 2021

RECEIVED
SEP 13 2021
BY:

Mark Frechette, PE
Project Director
NYSDOT, Region 3
333 East Washington Street
Syracuse, New York 13202

Dear Mark:

RE: I-81 Viaduct Project DEIS

Thank you for the opportunity to offer my comments on the I-81 Project.

Although I have been retired for 14 years, I still consider myself a team member with all of the engineers I enjoyed working with for 37 years in Region 3. The I-81 project has always held my interest, particularly because I was the lead designer of the I-81 Safety Project (D95143), Nedrow to Hiawatha Blvd., in the 1970's.

I admire the extensive effort by the I-81 team to explore all possibilities and develop alternatives that will best meet the needs of the traveling public. I do have reservations regarding traffic flow on the BL81 section between East Colvin Street and Erie Blvd., due to the need to accommodate side road vehicular and pedestrian traffic at some 12 signalized intersections. I suspect there will be some advanced type of signal interconnect system in place during peak travel hours. However, I see this section as the potential weak link in the Community Grid Alternative, particularly during typical Syracuse winters.

My most critical safety concern in this BL81 section is the proposed roundabout near Martin Luther King School. Please allow me to transgress a bit to explain my concerns with the roundabout.

As the Region 3 Safety Evaluation and Development Engineer for some 24 years, I had the privilege to attend a number of FHWA training sessions in Albany. At one such session, the presenter was both a licensed traffic engineer, and licensed psychologist. She emphasized that a traffic engineer has to understand how a driver thinks. She also emphasized that a traffic engineer cannot "violate driver expectations" if a highway design is to be safe, efficient, and effective.

The proposed roundabout near Martin Luther King School "violates driver expectations" in my professional opinion. In a very short distance, Syracuse bound drivers will transition from a freeway facility to an expressway type facility, and then to an arterial type facility. In that same space, drivers would be expected to change from 65 mph to 30 mph, change from 3 lanes to 2 lanes, merge into a 2 lane (?) roundabout, and then drive through a sight distance restricting reverse horizontal curve under a railroad bridge to the first of 12 signalized arterial intersections. That will be demanding.

I acknowledge that there would be numerous warning signs, markings, and flashing beacons to advise drivers in advance of the geometric changes. I suspect that some may respond that appropriate precautions will be taken to reduce safety concerns, especially during the opening of this area of the project, and over time, drivers will adapt.

Mark Frechette, PE
Project Director

September 10, 2021

Unfortunately, I sense another Onondaga Lake Parkway Railroad Bridge situation.

Even with enhanced warning devices, I envision unfamiliar drivers exiting I-81 onto BL-81, in moderate traffic, at a speed not prudent, and approaching an unexpected geometric design. Except, instead of a low clearance railroad bridge, the driver encounters a low speed roundabout intended to act as a "valve" to slow traffic before entering the slower speed arterial facility. As a result, I envision a higher accident rate and a higher severity rate at this roundabout, as compared to average rates, fundamentally because this roundabout location violates driver expectations.

I recommend other traffic control measures at this location to help drivers safely transition from a freeway facility to an arterial facility.

Thank you for your consideration of my comments.

Very truly yours,

Paul N. Gera

Paul N. Gera, PE (inactive)

956 Bellevue Ave.
Syracuse, NY 13204
October 10, 2021

Mr. Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Mr. Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Also submitted by email to New York State Department of Transportation at *I81opportunities@dot.ny.gov*

Dear Mr. Frechette, Mr. Marquis, and the NY State DOT,

I write to you as a resident of the Syracuse area and as an advocate for human and civil rights who has lived and worked in the Central New York area since 1992. I have worked professionally for two organizations whose origins tie directly back to the original construction of I-81 and the related destruction of the 15th Ward. Between 1996 and 2015 I served as the Director of the Central New York Chapter of the NY Civil Liberties Union, the New York State affiliate of the national ACLU. This local organization was formed to address the arrest of people who were engaged in protest against the destruction of the 15th Ward. Between 2015 and 2020 I served as the Director for Human Rights for Onondaga County. In this role, I worked closely with the Onondaga County/Syracuse Human Rights Commission, which was originally formed by the Mayor of Syracuse in response to demands from those same protestors. This local history is real and vivid to me, as is the enduring harm caused by the construction of I-81, especially in regard to members of the African American community. I am also a congregant of Temple Concord at 910 Madison Street in Syracuse and a member of its Social Action Committee. Our Temple is located right on the boundary of the what was the 15th Ward, and our congregation has a long history of socially conscious action including support of the protestors who fought against the destruction of the 15th Ward. I join with the members of Temple Concord in a commitment to Tikkun Olam, the Jewish obligation to act to repair the world around us, and in Isaiah's ancient call to "Do Justice." All this impels me to offer this written comment to you.

More than 50 years ago, the construction of Interstate 81 resulted in the destruction of a dense working-class neighborhood which housed the majority of African Americans in Syracuse as well as 3 Jewish synagogues. Long-time residents and businesses were displaced, and the economic and political power of the African American community was eroded. Those residents who clung to

the neighborhoods left along the new highway lived in poverty, pollution and constant unrelenting traffic noise in the shadow of the new highway. The harm done then continues to be seen today.

Now we are told that this highway must come down or be replaced because it has reached the end of its "useful" life. I strongly support the New York State Department of Transportation's current and preferred option to remove the 1.4 mile stretch of the highway and replace it with a street-level grid. For past and current neighbors, this is first step toward justice. However, I also recognize the very real potential to compound the harms perpetuate in the past through new harms that can occur during the demolition of the highway and the construction of the new street level roadways.

Accordingly, I call on you to take every step within your power to attend to the following items one (1) through five (5) in order to address past and potential new harms. I feel that the this is necessary to ensure the fair and equitable treatment of community members who now live, work and study in the shadow of the current viaduct and of people from communities of color including those whose families once thrived in the 15th ward, many of whom continue to struggle with limited resources and few advantages. I ask you to include the following recommendations in the DOT's final Environmental Impact Statement, so that these provisions will further guide the construction project moving forward.:

1. Remediate the potential, expected and experienced negative environmental impacts on residents who live, work and study in proximity to construction areas. This should include:

- Taking clear steps to ensure the reduction and minimization of dust, debris, water, air, and noise pollution for nearby residents, workers, and students

- Conducting a cumulative exposure analysis for residents who live in the communities within 600 feet of the viaduct

- Identifying multiple options to abate and alleviate environmental hazards and exposures related to the construction

- Conducting a community health needs assessment before construction begins.

- Developing and implementing free health monitoring programs for residents who live in the communities within 600 feet of the viaduct during the full process of construction and for 8-10 years after it is completed.

- Move the proposed highway access ramp so it is at least 600 feet from the STEAM school at Dr. King Elementary School.

- Rejecting the use of Wilson Park as a staging site for construction or construction materials.

- Providing funding to assist residents to make improvements in their homes and property aimed to reduce the infiltration of dust, debris, water, air and noise pollution and reduce or eliminate exposures. Such improvements might include but should not be limited to insulation, replacement windows, storm windows, water and air filters, etc.

- Providing mechanisms for parents, faculty, and staff at the Syracuse City School District to have meaningful and effective input into plans for critical stages of construction, especially in relation to

schools like Dr. King Elementary School that may be affected by construction, new roadways and traffic patterns.

- Conducting a study to determine if the community grid will remain a major roadway, as defined as travel by 30,000 cars or more daily.

2. Generate real economic benefits to local residents, especially residents of color, by requiring local and minority hiring on all aspects of the project. -This should include:

- Requiring Contractors and Subcontractors to hire 30% People of Color who are residents of the City of Syracuse and then from the surrounding areas of Onondaga County

- Requiring Contractors and Subcontractors to hire 30% local people. First priority should be to hire people who live directly adjacent to the viaduct, then from across the City of Syracuse, and then from the surrounding areas of Onondaga County and Central New York.

- Creating a community workforce agreement to legally require that unions whose members work on the project hire local Syracuse residents, with a preference for impacted Syracuse neighborhoods.

- Active monitoring of compliance with the above hiring goals and expectations, with transparent public access to the results.

3. Mitigate displacement of lower income residents affected by the I-81 project by providing relocation assistance, supports and funding, and official recognition of a right to return. This should include:

- Providing assistance to such residents who wish to move by helping them identify new or temporary relocation housing options and by providing reasonable moving costs.

- Providing full or partial funding for new security deposits and partial rent subsidies that will enable lower income renters who wish to relocate to do so. That should include but should not be limited to funding to pay for the differential between previous housing costs and new housing costs. The differential funding should be provided for no less than 2 years.

- Providing information to these residents about the section of New York State Human Rights Law that prohibits discrimination by new or existing landlords based on source of lawful income

- Offering market-rate buyouts for existing homeowners who seek to move.

- Accommodating residents who would like to relocate temporarily with an official right to return.

4. Provide a measure of redress for past harms in the original construction of I-81 as well as expected disruption and dislocation of current residents during demolition and new construction by restoring a significant parcel of land to local control. This should include:

- Designating a full eight (8) to ten (10) square acre parcel of land directly east of Dr. Martin Luther King Jr. Blvd East to be held for development that will be directed by a community land trust. The overwhelming majority of the trust's leaders should be drawn from local and directly affected Communities of Color with connections to that area.

- Establishing a land transfer policy before returning the land to the City of Syracuse. This policy should be written to reflect that its purpose is to restore and enhance communities impacted by I-81, past and present, especially the predominately Black community adjacent to the viaduct.

5. Initiate and continue active dialogue with leaders in the Disability Advocacy community to identify and anticipate the design elements in the community grid that may create foreseeable physical dangers and barriers for people with disabilities. This dialogue should begin immediately and continue through every stage of the planning and construction.

- Reach out to the individuals and organizations for whom I provided contact information in oral comment to the stenographer who was present at your event at Dr. ML King School on 9/9/2021. This included representatives of Disabled in Action (DIA), Access CNY, ARISE, Aurora and the Syracuse Chapter of the National Federation for the Blind.

- Convene initial discussions about street level design elements of the proposed Business Loop 81, especially in regard to the proposed multi-lane portion of Almond Street that will include separate lanes for both vehicles and bicycles. During these discussions seek information about design elements that may present particular challenges and dangers for people with disabilities, especially for those with sensory and mobility disabilities.

- Convene subsequent discussions about how steps in the construction process may present additional challenges and dangers for people with disabilities, especially for those with sensory and mobility disabilities.

The permanent removal of the viaduct and the creation of a true community grid has the potential to eradicate a stark dividing line that I-81 created in the City of Syracuse, while improving housing conditions, health outcomes, economic and educational opportunities for all its people. I feel that the above recommendations are necessary to make these positive outcomes possible. These recommendations will also assist the NYSDOT in meeting its own stated goals for the project, including enhancing economic growth and vitality in the City, re-connecting communities within the city, and providing better access to jobs, businesses, and services.

I ask you to consider and respond to these recommendations with explanations of why the DOT decided to include or exclude the specific provisions I have articulated in items one (1) through five (5) in the DOT's final Environmental Impact Statement. I thank you for your efforts, and hope that together we can help address a historic wrong and create more equitable outcomes for the entire region.

Sincerely,

Barrie H. Gewanter

Barrie H. Gewanter

Rex Giardine
112 Circle Road
Syracuse, New York 13210

RECEIVED
OCT 1 2021
BY:

October 14, 2021

New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, New York 13202

ATTN: Mark Frechette, PE, Project Director
RE: Interstate 81 Public Comment
HAND DELIVERED

Mr. Frechette:
I appreciate the opportunity to provide comments, albeit the last day to do so. As an architect and engineer living and working within the City of Syracuse, including facilities planning experience in private practice, the City, the County, Syracuse University and SUNY ESF, I am aware of the once in a lifetime challenges and opportunities your project presents.

First of all, I wholly support the Community Grid option and can see the challenges your agency faces of bringing existing Route 81 to the ground level somewhere to the south of downtown. In this sector doing so is clearly complicated by the historic existence of the elevated marginally active railroad right of way that forms a clear if unnatural boundary between the neighborhoods to the southwest of the rail line and both downtown and the University Hill.

While a roundabout as recently proposed, can be a very effective way to slow, largely without stopping, and disseminate traffic in multiple directions your agency is clearly challenged on whether to have one as well as where to best locate it south of the City for the optimum outcome for your project.

I would ask you to consider and keep the following in perspective:

Could it be that this is the right location for a roundabout and the wrong location for an elementary school?

Martin Luther King School was constructed I believe in 1950 on a slightly elongated city block with a land area of approximately 5.3 acres. The planning for the school may have been done in harmony with Interstate 81's initial planning. For many years the raised grade portion of Interstate 81 along with the railroad has formed a formal boundary to the east of the neighborhood and specific to this school The easterly side near Rt. 81 is primarily where faculty and staff park.

Based on information I have gleaned from the Syracuse City School District, the current population of the school is likely around 644 elementary students. The attached attendance map provided by the School District several years ago shows where students attending MLK school lived and who lives within the walking versus bus transportation distances.' I would recommend you ask the district for current maps which would allow you to fully appreciate where all students live and where they attend. Seeing all of the attendance maps is graphically fascinating if not bewildering. It likely begins to shed light on why our school transportation costs are among the highest anywhere.

At 127,430 square feet, the Martin Luther King School it is a right sized and relatively well constructed building as most schools of the 1950's were. I understand there are limited capital maintenance needs for the building at this time. There are other schools around the City that need and are slowly getting capital reinvestment.

I'm sure you are aware your agency's decisions on Interstate 81 will impact this neighborhood in particular and the region for much of the next century.

Roundabouts while becoming more common are typically effective at keeping traffic moving but tend to have most drivers including those new to the area concentrating over their left shoulder for their opportunity to merge into the circle. I suspect those same drivers to a lesser extent concentrate on whether there are or are not pedestrians within that dynamic. While I would expect few pedestrians in the area of that proposed circle it really depends on how larger issues are solved nearby. As you're undoubtedly aware from the recent fury of comments, proximity to an elementary school brings a whole new dynamic.

Would or should the community consider constructing a new elementary school somewhere else in the neighborhood catchment area of the current MLK school, that was well positioned to serve the community that surrounds it, on a site with contiguous slower moving more walkable complete urban streets? Could your project be the catalyst or the driver?

While this option may seem far-fetched, please consider several factors. By NYS SED Planning guidelines the site for a school like MLK should be around 10 acres using their planning formula of 3 acres plus one acre per each 100 children. The existing 5.3 acre MLK site falls far short of that. While a challenge to find a 10 acre site right located within any city, sometimes when a school site can abut existing open municipal park space, or even by strategically closing an existing non-essential street to gain the land such a site can be often be created.

This approach would require a bit more planning and cost and some very creative and rare interagency and intermunicipal planning, but may create a better outcome for your project goals and the affected community for the ensuing century.

Traditionally school construction is typically funded through a combination of NYS SED funding based on formulas and a local share. The Syracuse Joint School Construction Board has had a combined $456m in Phase I and II over the last dozen years and another $300m in the pipeline with a very favorable formula to the City that keeps the local share to less than 3% however the legislation does not include new construction and any investment specific to MLK is not on the near horizon. Mayor Miner missed an opportunity suggested by Senator DeFrancisco on November 24, 2014, to have the legislation changed to allow new schools to be considered when costs were comparable, even slightly more, than the cost of a long overdue renovation.

Your regionally significant project brings a unique combination of federal, state and regional resources and planning focus to the table to resolve many issues and create opportunities above and beyond just traffic management. I would view it as a unique urban planning opportunity.

If the City and School District decided on their own and could justify and opted to build a new school for the typical reasons, if strategically designed and wisely paired with State Aid, the local cost share might be 25 to 35%. Through a project dynamic like this maybe the local share is reduced even further.

While new school construction is exceedingly rare in New York State it can be cost effective and might be the trigger to draw more residents rather than just visitors to this area. Just for budgeting, figuring a conservative mid-range overall project cost of say $500 per square foot, assuming a number of parcels could be acquired to create a suitable site for less than $1m, and King School at 127,430 square feet could be replace more or less in kind the project cost is likely under $65m. The County built a new criminal courthouse for considerably less per square foot if adjusted to 2021 for inflation and Solvay expanded to create a nearly new school on a sprawling site for just a fraction of that square foot figure.

I suspect any local share for a new school for this neighborhood if any may be considerably less than relocating the roundabout from where you first proposed it.

If such an idea gained traction, what should then become of the well built existing school? That depends. While it could be repurposed to accommodate a specialized or older school age population bussed to this location or more wary of vehicles and roundabouts, as is, it might make a handsome well located location and appropriately sized location to relocate SCSD District Headquarters who presently do not even fit in the facility they currently occupy at 725 Harrison Street. The Harrison street parcel is surrounded entirely by State owned institutions, Hutchings and Upstate Medical University. As a return should this occur, I would propose the City donate the property at Harrison Street to Upstate University who are perennially looking for contiguous real estate and could benefit the thriving medical complex and community it serves.

Honestly the City of Syracuse, who are typically giving away real property should be land banking strategic parcels to envision and plan for generous school sites contiguous to open parkland and

concepts for constructing a few new needed school buildings maybe so fabulous that even Fayetteville might be jealous.

As you may surmise, I am passionate and vocal about the quality of the academic environment our community's school children experience. The concept for this letter came to me only last night after addressing and listening to the SCSD Board of Education. While I may be among the last public comments to arrive at your desk, maybe this is the idea that matters the most. I hope you will give it the serious consideration I feel it warrants.

I can be reached at the address above, at rexgiardine@gmail.com or 315-345-6588.

Regards,

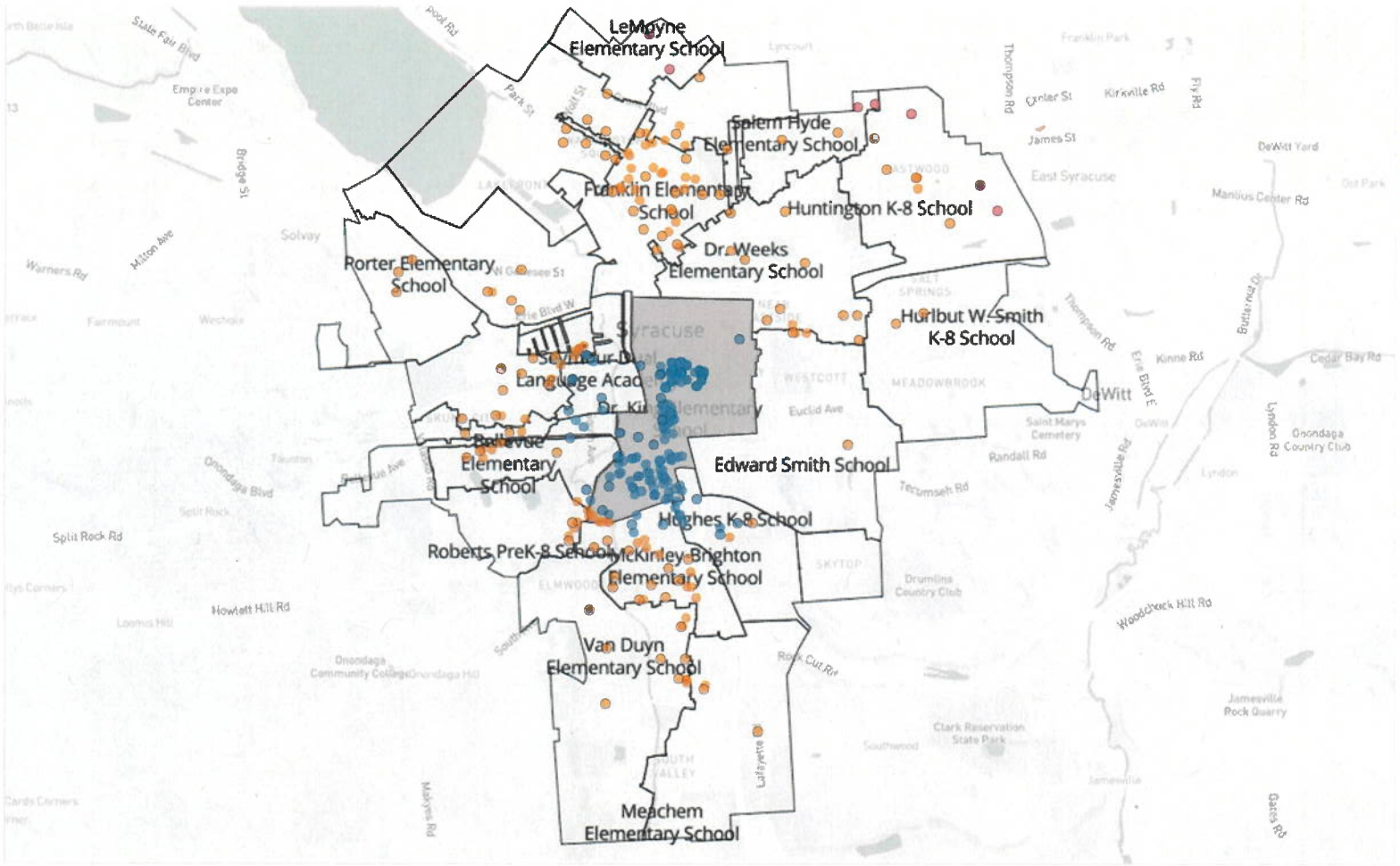
Rex Giardine

enclosure

cc w/enclosure:

Governor K. Hochul
Rick Marquis, Federal Highway Admin.
Senator R. May
Senator J Mannion
Assemblymember P Hunter
Assemblymember W Magnarelli
Mayor Ben Walsh, Chair of the JSCB
Common Council Members
Onondaga County Executive R. Mcmahon
Superintendent Alicea, SCSD
SCSD BOE Members
JSCB Members not in the above

Students Location and Distance from Dr. King Elementary School



School Name
Dr. King Elementary Sch..

Distace Category
- <= 1 mile
- 1< and <=3 miles
- 3< and <=5 miles
- >5 miles

School Type	School Name	# Live In Att Zone	# Outside Att Zone	# Not Match/Missing	Grand Total
Elementary Sc..	Dr. King Elementary School	276	267	16	**559**

Data source: Active student enrollment as of Deb 7, 2018 from eSchool.
Geocoding: Student location was geocoded in ArcGIS based on student physical address.
Match rate: The matching rate was around 97%, address with PO Box, outside of Onondaga county, or missing couldn't be located in the map.
Note: Pre-K students were excluded.

Terry Grabowski
5871 Winacre Dr.
La Fayette, NY 13084-3340

RECEIVED
SEP - 2 2021
BY:

Aug 30, 2021

I would like to keep this short + to point.

Build a Bridge to replace the old one.

Why worry about the bridge splitting the city. Have you seen what Upstate Hospital has done to split the area.

To move traffic across as the past 50 years has been efficient. Business and travellers have been happy. Going around to 481 to connect will take at least 13-14 min.

Look at your current New York State Fair travelers. Your ground approach will be nothing but a nightmare.

Build a beautiful bridge.

RECEIVED
AUG 11 2021
BY:

Geoffrey M. Gursky
Licensed Land Surveyor
7989 Hall Road
Cleveland, N.Y. 13042
(315)675-3432

TO: Mark Frenchette, PE Project Director
New York State Department of Transportation- Region 3
333 East Washington Street
Syracuse, NY 13202

Dear Mark:

I am just reading an article in August 10, 2021 Syracuse Post Standard about I-81 meetings. I will try to make it to at least one meeting. But I do have some concerns that I am going to mention to you. At least this way, there will be a record of what I think and can refer to it later if necessary. I am a graduate of SUNY-ESF and occasionally go to the Syracuse Campus to visit or audit classes from time to time. I get off the Adams Street exit from 81 south and go to the light at Adams Street. Instead of turning left at the light at Adams Street and then going past the hospitals to go to the campus, I go around the bridge abutment and continue on Almond Street and go past Toomey-Abbott Towers and go to ESF that way. I consider this the back way to ESF. I do this to avoid the hospital traffic and the many people walking across the roads there to get to parking garages, as well as to avoid any ambulances that may be in the area. I consider this the 'back way' to ESF which seems to be much simpler way there. This is a second way to get there, which brings up another point. It is a good practice to have two ways to get to a certain destination. On the other hand, lets say there is a major event at the Carrier Dome, maybe a game, it is better to have two ways to leave the area as opposed to only one way. Hopefully, there will be no need for emergency vehicles (fire, ambulances, or police) to be needed in this area during a sporting event. Also, in this area is a power plant. How will that be dealt with? There are living quarters for many people there as well. Another concern is the old entrance to Oakwood Cemetery where the archway is. There was an article in the Post Standard recently about it. This historical artifact needs to be protected and should have easy access to it for the general public. I hope my comments are useful and beneficial to this project and any good things done here will benefit people and businesses for many years to come. Please do keep in touch.

Regards:

Geoffrey M. Gursky

Hampton Inn & Suites by Hilton Syracuse- North (Airport Area)
1305 Buckley Road, Syracuse, New York 13212
tel: **315.457.9900**
fax: 315.457.6600

RECEIVED
JUL 27 2021
BY:

July 22, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Re: Draft Environmental Impact Statement - Need for Additional Time for Review and Comment

Dear Mark and Rick:

Like many stakeholders in Syracuse and Central New York, we are prepared to review and provide comments on the Draft Environmental Impact Statement ("DEIS") that was released on Friday July 16, 2021.

The purpose of this letter is to formally request that the public comment period be extended through the end of the year to allow sufficient time for a complete review of the 28,000+ page document. COVID has decimated our industry and summer leisure travel has been difficult to manage due to the labor shortage. Most importantly the amount of data just made available, it is not feasible to have complete responses available by September 14th.

The future of Interstate 81 is an important decision that will directly impact our businesses/industry and our team members. It is critical that everyone be provided sufficient time to have their comments submitted and considered.

Thank you in advance for your consideration.

Sincerely,

Marc Emmi
General Manager
Hampton Inn & Suites Syracuse North – Airport Area

HILTON HHONORS
for reservations please visit us at hampton.com or call 1.800.hampton

Carmen Harlow
143 Slayton Avenue
Syracuse, New York 13205
(315) 403-5299
e-mail: ushof.syr.ny@twcny.rr.com

September 14, 2021

RECEIVED
SEP 16 2021
BY:

Mark Frechette, Project Director
NYSDOT Region 3
NYS Department of Transportation
333 East Washington Street
Syracuse, New York 13202

Dear Mr. Frechette,

As a lifelong resident of Syracuse, New York and the owner of a property that sits adjacent to Route 81 North, at 436 Martin Luther King East and Renwick Avenue (dead end), which I understand has been identified for a potential acquisition in a preliminary design of the I-81 Project, The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS). Throughout the twenty-five years of family ownership, I have quietly conducted business at this property, including a concession stand, sports displays, and storage, to name a few, but also have supported several community and youth initiatives. Many proposals and other business ideas have been created and discussed as well, including a welcome center/sports hall of fame, but have been put on hold because of the I-81 discussions over the years. One of the most significant ideas that have had to be put on hold at our property (known as Harlow Park) is the placement of some kind of plaque or tablet to honor my late father Frank "Pop" Harlow. This would serve to recognize him as one of the first Blacks, a pioneer, in sports and public service in the city of Syracuse. I am respectfully requesting that any 'potential acquisition' of this property include consideration of this idea. I thank you in advance.

Respectfully,

Carmen Harlow, Manager/Owner
Urban Sports Hall of Fame of Syracuse, NY & Harlow Park

SYRACUSE NY 130

16 AUG 2021 PM 4 L

Emanuel B Henderson

NAME

321 West Taylor Street

ADDRESS

Syracuse ny 13202

ZIP CODE

DELIVER TO:

NYSDOT Region 3
I-81 Viaduct Project
333 E. Washington St.
Syracuse, NY 13202

RECEIVED
AUG 17 2021
BY:

13202-474299

Dear Department of Transportation,

When planning the reconstruction of I-81, please take my following comments into consideration:

DOT oversight of construction compliance with EIS.

nyclu.org/i81 | #LetsTalkAboutI81

DOT must offer mitigation funds for transportation in census track 42.

TRANSPORTATION
nyclu.org/i81 | #LetsTalkAboutI81

DOT must create a relocation plan.

nyclu.org/i81 | #LetsTalkAboutI81

RECEIVED
AUG 17 2021
BY:

July 22, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Re: Draft Environmental Impact Statement - Need for Additional Time for Review and Comment

Dear Mark and Rick:

Like many stakeholders in Syracuse and Central New York, we are prepared to review and provide comments on the Draft Environmental Impact Statement ("DEIS") that was released on Friday July 16, 2021.

The purpose of this letter is to formally request that the public comment period be extended through the end of the year to allow sufficient time for a complete review of the 28,000+ page document. COVID has decimated our industry and summer leisure travel has been difficult to manage due to the labor shortage. Most importantly the amount of data just made available, it is not feasible to have complete responses available by September 14th.

The future of Interstate 81 is an important decision that will directly impact our businesses/industry and our team members. It is critical that everyone be provided sufficient time to have their comments submitted and considered.

Thank you in advance for your consideration.

Sincerely,

Missy Hughes

Missy Hughes
General Manager
Homewood Suites by Hilton – Syracuse/Liverpool

HILTON HHONORS

Homewood Suites by Hilton®
275 Elwood Davis Road • Liverpool, NY 13088
Phone 315 451 3800 • Fax 315 451 3800 • www.syracuseliverpool.homewoodsuites.com

HOMEWOOD SUITES BY HILTON™

IWLA
The Resource for Warehouse Logistics

2800 S. River Road, Suite 260
Des Plaines, Illinois 60018
www.IWLA.com

P: 847.813.4699
F: 847.813.0115
E: email@IWLA.com

August 26, 2021

Mark Frechette, P.E.
Project Director
New York Department of Transportation
Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Ave., Suite 719
Albany, NY 12207

Dear Mr. Frechette, and Mr. Marquis,

On behalf of the members of the International Warehouse Logistics Association. I am writing to request consideration of extending the public comment period on the I-81 Viaduct Project Draft Environmental Impact Statement (DEIS) by an additional 90 days.

IWLA member companies are warehouse-based third-party logistics (3PL) providers that act as distribution centers for their customers. They offer warehousing; inventory and supply chain management capabilities; and a broad range of value-added services. 3PL providers are an integral component for both small and large businesses seeking to increase efficiency, concentrate on core competencies, and deliver goods and services to their customers. 3PLs foster business growth through supply chain optimization, which is essential to maintaining a healthy and robust economy capable of providing U.S. jobs.

Currently, the comment period is set to expire Tuesday, September 14. The project report was released on July 16, giving just 60 days for community engagement and public comment. The report released by the New York State Department of Transportation is more than 28,000 pages in length. Sixty days is an inadequate amount of time to provide interested stakeholders for an accurate and thorough reviewof this massive document.

The published DEIS and supporting technical documents are so voluminous that all stakeholders need adequate time to assess how key safety and environmental concerns central to our members are addressed. Eliminating a highway and replacing it with a boulevard lined with controlled intersections increases delivery times from distribution centers and increases exposure between commercial vehicles and pedestrians.

Thank you for your consideration of this request.

Sincerely,

Steve DeHaan
President and CEO

RECEIVED
AUG 31 2021
BY:

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Subject:	FW: I-81 Jurison Comments
Date:	Thursday, October 14, 2021 4:56:20 PM
Attachments:	2021-10-14 I-81 Jurison Comments (final - with exhibit).pdf

Comments.

From: Alan Jurison <ajurison@storm.net>
Sent: Thursday, October 14, 2021 4:51 PM
To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>; rick.marquis@dot.gov; dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>
Subject: I-81 Jurison Comments

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Please see the attached PDF as formal comments on the I-81 project in Syracuse, NY.
18 pages including photographic exhibits.

I appreciate your time and attention to this matter.

Regards,

Alan W. Jurison
545 Grant Blvd
Syracuse, NY 13203
ajurison@gmail.com

To: Mr. Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

To: Mr. Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

To: mefrechette@dot.state.ny.us
To: rick.marquis@dot.gov
To: i81opportunities@dot.ny.gov

Sent Via Electronic Mail and USPS First Class Mail

October 14, 2021

Dear NYSDOT and FHA:

Please see below for my comments and concerns regarding the I-81 proposed project in Syracuse, NY.

Executive Summary

First, I would like to say that I strongly suggest that the project follow the "viaduct alternative" plan with community grid like enhancements at the street level. This would be a very good compromise for all constituencies and accomplishes it within roughly the same cost without a significant delay or project length. One year of additional construction required to coordinate these changes is well worth it for a project that has a lifespan of 75-100 years. This is a decision that will impact many generations over the next century. Ideally, we'd take a chance to look at and develop the Skyway + Grid plan, however if that is not possible, I suggest the viaduct alternative, but elevate it higher than what is currently proposed, with community grid like street scape features.

Going solely on the proposed "Community Grid" plan $2B is an investment in the community to decrease overall efficiency and function for the entire region. It's really a disservice to the public at large to placate to a very small constituency that just happened to have loud voices. Note, I say this in the past tense, for good reason:

There was early support from some local leaders under the "community grid" plan. However, DOT and the FHA need to acknowledge that many of the civic leaders who endorsed this plan to influence the DOT's decision in this direction are no longer in office or will not be in office at the time this project breaks ground. The lone major public supporter, Mayor Ben Walsh, may not even be mayor in less than a

few weeks pending the results of the election. DOT and FHA may be reviewing these comments after a new administration has been elected and formed.

If you review the opinions and actions of many of the present-day community leaders who are now in place, most have not fully endorsed the community grid concept. Most have been seeking consensus and compromise. While many of them have acknowledged the writing on the wall with the DOT's nod towards community grid and that it might be too late to influence the decision. I think we need to look at these leaders and feedback we have been receiving from the public at large, which have not been able to come to consensus. Picking one versus the other is a mistake. We must combine both ideas into a single vision, and that would be the Viaduct Alternative with Community Grid streetscapes features below the highway level.

I do also have major concerns with changes both proposals include regarding changes to I-81 (or BL-81) north of I-690 and some of the changes on I-481 near Exit 3. Many of the changes here are recent and have not been subject to a lot of scrutiny or review by the public. The media and the public has been so focused on the viaduct versus grid section of the project, that I think a lot of people have overlooked and not seen the latest DOT plans for the section north of I-690 and I-481. Please see more details below.

Finally, something that is not discussed – the City of Syracuse and New York State DOT is incapable of maintaining all the additional proposed streetscape in the community grid. We will spend $2B and several years later it will look just as bad, or even worse than the >60-year-old I-81 viaduct does today. Please see more details below.

Project myths and misconceptions

Myth 1: I-81 "divides" the community. The same could be said about I-690, it also divides Syracuse. Do you hear anyone talking about tearing that down? No. In addition, the proposed large multi-lane boulevard divides Syracuse in the community grid plan. This will still be very cumbersome to cross as a pedestrian or bicyclist. These same accommodations and visual enhancements can and will be made in the viaduct alternative. All successful cities have these types of alleged "barriers" in them. We're obsessing over nonsense.

A community can thrive with a major viaduct. For example, look at I-35 transecting Austin in almost similar form as I-81. Here's a community that enhanced the visual appeal of the existing viaduct, and an entire community that wants to increase its capacity in some form, not tear it down. Both the East and West sides of this viaduct have verry successful retail, residential and academic centers. This city is one of the nation's most thriving and growing cities, property on both sides of this viaduct is highly desired and is being highly enhanced and redeveloped. I-35 serves that city well. While there is controversy on the details of how to expand that highway to meet the exponential growth of the thriving population of this city – nobody is advocating tearing such a key piece of that city's infrastructure down. They want to increase its capacity without increasing its width, and community is focusing on solutions to do that – not tear it down. Austin is a model that you can live with a viaduct, you don't need to tear it down.

Myth 2: The community grid re-joins the community. We cannot undo the social injustice from when I-81 was built, and the 15th ward was demolished. The Community Grid plan does not re-build the 15th ward, and it does not rejoin a community. It does not re-unite, rebuild, or create any neighborhood. In this plan, a large boulevard still divides the community. And most of the green spaces and aesthetic improvements are many blocks north of where they are desired. The Almond / Harrison / Adams / BL-81

intersections will still be mostly paved, the green space by the removal of the viaduct that is created is very far north of these academic and residential areas live and work. This does not truly accomplish what even the former community grid sponsors in their heyday wanted.

Myth 3: We can't have both a viaduct and community grid. As already explained above, we can combine the Viaduct Alternative with Community Grid like streetscapes and enhancements… All constituencies get 75% of what they want, nobody leaves the room empty-handed. My suggestion would be to try to elevate the viaduct as high as possible. Many other large, successful cities have their viaducts many times taller than what we have today or what is proposed. I would challenge the DOT and FHA to find a way to make it work, there are many other successful viaducts that traverse urban areas with success to learn from.

Myth 4: Other cities that have torn down their viaducts have thrived because of those projects. All the examples that have been provided, such as Rochester, Milwaukee and San Francisco are not similar to I-81 in Syracuse in any way… None of these routes were primary, completed core infrastructure routes for traffic. They were ancillary viaducts that had no material impact on traffic. In these cases, they were replaced with nothing – just streetscapes, adding new blocks with new buildings and residences – because they were underused and not really serving a key transportation need in the first place. You'll note the Syracuse community grid plan does not return as much green space as these other projects. Few new blocks are created. Entire new neighborhoods cannot be built in the Syracuse community grid plans. Yes, it's nice to have the green space, and yes, these projects have enhanced the areas of those cities that the highways were torn down… But these are not comparable situations. There are alternate highways to enter and exit Rochester and Milwaukee quickly without the sections that were torn down. The same case cannot be made here in Syracuse. In San Francisco, where the US-101 viaduct was shortened, this was never a completed highway / viaduct in the first place. It is also not a parallel situation to Syracuse. And if you've ever driven this stretch of US-101, you'll note the heavy, long lines of traffic waiting on the viaduct as it ramps down to the city street scape… wasting millions of hours and creating more urban smog than would be otherwise if that traffic was moving efficiently. San Francisco is a traffic nightmare because they do not have an efficient highway system within the main part of the city. We should not be emulating a complete utter failure of efficient transportation design. Tearing down a high-speed viaduct within our city's core is a mistake that cannot be un-done for a century.

I-81/BL-81 north of I-690 Concerns

Many of the proposed changes north if I-690 in both plans have not been thoroughly circulated in the media and are recently introduced. I am not opposed to the new interchange proposed at Bear Street, but they should not exclude or be considered a substitute to existing connections in this area of the highway.

The current plans in both projects are to the detriment to the thriving Franklin Square neighborhood of the city. This neighborhood is an industrial area revitalized with one million (1MM) square feet commercial and residential housing. I would recommend abandoning these three main proposed features in both plans:

- **81 North Court Street off ramp should remain** – Eliminating this ramp in both plans serves no purpose. It will cost more money to demolish it and re-plant than it is to keep it and resurface it. It can remain Franklin square entrance route for those traveling on I-690 West or I-81/BL-81 North without having the inefficiencies of going up to Bear Street and back-tracking to Franklin Square.

- **81 North Butternut ramp northbound should remain.** There is significant northbound traffic from Franklin Square and other northern parts of the city. Throw the computer models away, I invite you to observe this onramp during the PM drive peak times and you will see it is being used. Consolidating all the entrances to 81 in this area further south at Pearl Street is an ineffective strategy and is counter the "grid" philosophy. If we want to disburse traffic, we should offer multiple opportunities to enter 81 North from Downtown, we should keep the same number of onramps, or increase them from different city blocks… not decrease them.

- **Genant Drive to 81 South** should remain. Similar to above, this is a common exit route to those who live and work in Franklin Square.

Travel time estimates to/from Franklin Square have not been completed with the proposed changes. Therefore all changes that remove or create further distance to access to this area should be reconsidered. West Street is a common gateway for many to Franklin Square, and that is going away under both plans.

Those changes will delay access to Franklin Square and put more traffic on these three other areas. Adding new impediments related to the neighborhoods connections to 81 should be abandoned. Causing everyone to go down to Pearl Street, or up to Bear Street adds needless delay and impedes traffic flow. Put it another way, both plans as they are designed right now are to the detriment to one of the city's most vital, growing neighborhoods.

I-481 (I-81) Eastern concerns

- **I-481 Southbound at Exit 3 (or I-81 equivalent)**, a second econd right hand turn lane for Westbound NY-5/NY-92 traffic is needed. I like the current design with three left hand lanes for eastbound traffic at a signalized intersection, but a single right hand lane is a mistake. Take the last ~500-1000 feet and add a second right-hand turning lane for Westbound traffic. If you look at the current I-481 Southbound to Exit 3 NY-5/NY-92 Westbound, after the redesign a decade ago where it became a stop sign over a yield sign, this traffic already backs up during peak travel periods onto I-481. Making it a signalized intersection will yield even more traffic queuing up than a stop sign. It's strongly recommended this proposal accommodates 3 left hand turning lanes for Eastbound traffic and 2 right hand turning lanes for westbound traffic to avoid traffic backing up onto the Interstate.

- **Eliminate Sound Barriers/Wall near DeWitt Town Hall.** The sound barriers proposed north of Exit 3 near Butternut Drive in front of the DeWitt Town Hall are needless and ugly. Do without them. With the nearby Erie Canal Park, this is already has very beautiful landscape as-is, there is no reason to add that unsightly wall to that area. The adjacent area is not a residential area, and if the traffic simulation numbers are correct, there is only incrementally more traffic passing through this area than it is as designed today. Do not build that wall.

City of Syracuse / NYS DOT Do Not Have Resources to Maintain Community Grid

Finally, something that I have never seen discussed – the City of Syracuse and New York State DOT is incapable of maintaining all the additional proposed streetscape in the community grid. We will spend $2B and several years later it will look just as bad, or even worse than the >60-year-old I-81 viaduct does

today. While the simulated plan documents, photos, videos show a picturesque vision of the community grid, this is not what the project will look like after a few short years.

The same civic leaders mentioned above who were the campions of the "community grid" have already had their chance to impose their "vision" on Syracuse. They did it with the $47M "Connective Corridor" project. Key proponents of this misuse of public funds were former Syracuse University Chancellor Nancy Cantor and former Syracuse Mayor Stephanie Miner, and others. These are the same former leaders – no longer in power – that coerced the DOT to prefer the "community grid" plan.

As background, the "Syracuse Connective Corridor" was a $47M public funded project to improve streetscapes on a much smaller scale than what the $2B "community grid". See *"Syracuse's Connective Corridor: 2 miles long, $47 million better"*, The Post-Standard/Syracuse.com, Oct. 14, 2015[1].

Let's review the success of the Community Grid "vision" six years later. The only successful part of the project that remains is frequently used and enjoyed out of this endeavor was making University Avenue bidirectional instead of one-way. That could have been done with a lot less than $47M.

This is a project that was completed in October 2015. **See Exhibit 1**, photos from September 15, 2021, approximate six years after project completion. One photo the disrepair is included inline below:

[1]*See "Syracuse's Connective Corridor: 2 miles long, $47 million better"*, The Post-Standard/Syracuse.com, Oct. 14, 2015
http://syracuse.com/news/2015/10/syracuses_connective_corridor_2_miles_long_47_million_better.html
(Accessed October 14, 2021)

Most, if not all the enhanced street scape has not been maintained. It is left in shambles, ruins. The brick pavers have not been maintained. The paint is fading. There hasn't been any landscaping, weed or mowing of these areas… And these areas are some of the most travelled and visible areas of our city. This utter civic failure is right in front of our faces every day… this is how the "community grid" will look in a few years. These photos were taken only a few weeks from the first day of classes at Syracuse University. While the private grounds of Syracuse University were carefully manicured, landscaped, mulched, new flowers added to give returning students, parents and staff a fresh start to a new academic year, a few blocks south, on the public Syracuse Connective Corridor, still sits this absolute disaster.

Furthermore, the bike lanes, even six years later, are still seldom used, are discolored, and also – six months out of the year are unusable because the city plows snow into them and they are covered with large blocks of frozen snow that turn into solid ice blocks. I truly wish I had photos to show for the record – but building dedicated bike lanes in Syracuse, NY with its climate and large amounts of snow is a mistake, an eyesore, and of use to nobody half the year.

Given a budget of $2B, that's two billion dollars, or more with project scope creep, price increases, unexpected delays and expenses… it would be more effect use of that money to take something that works fairly well (the viaduct and surrounding infrastructure) and rebuild and enhance it… make it better, fix the flaws as best as we can for the betterment of the entire region. Do not make it an urban boulevard that is not well maintained and becomes an eyesore. The few supporters that remain of the "community grid" all say on the record that the "community grid" will not become another "Erie Blvd" – but their track record does suggest this is true. Erie Blvd still is an eyesore, in both the towns of DeWitt and the City of Syracuse, even after the recent street scape improvements. And the "Connective Corridor" is an utter failure. Let's not waste >$2B and make the same mistake in a streetscape that the city and state has no money to maintain and keep looking nice.

Summary

I do appreciate the opportunity to comment on the proposal, and I hope that these comments, combined with the entire body of additional comments helps drive the DOT and FHA to a best of class compromise solution of the "Viaduct Alternative" + "Community Grid". There is no reason why we cannot have both. We need to take the best ideas out of both plans and combine them, that is the only way to achieve consensus, and that is the best path forward for the next century.

Respectfully Submitted,

Dated: October 14, 2021

Alan W. Jurison
545 Grant Blvd
Syracuse, NY 13203
ajurison@gmail.com

Enclosures

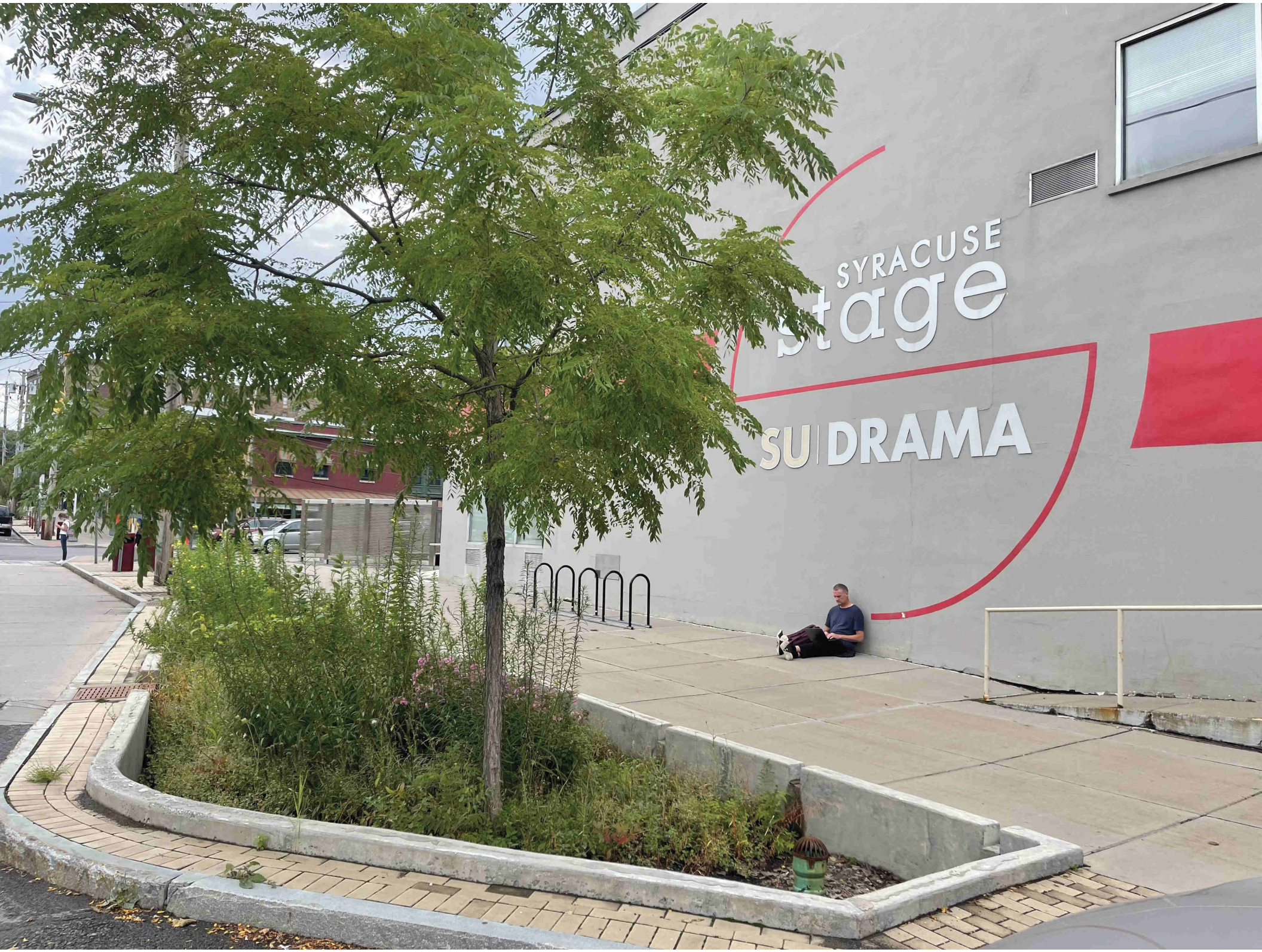
Exhibit 1

Syracuse Connective Corridor
~6 Year Review
Project Completed October 2015
Photos from September 15, 2021

Madison

STOP
ALL WAY
Madison St
University Ave

SCHOOL BUS
NO STOPPING
ANY
TIME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SYRACUSE NY 130

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Let's talk about I-81.

nyclu.org/i81 | #LetsTalkAbout181

42 Kamell

~~David Friedman~~

NAME

RECEIVED
AUG 19 2021
BY:

~~1310 Euclid Ave~~
~~100 Morgan Dr Fayetteville, NY~~

ADDRESS

DELIVER TO:

NYSDOT Region 3
I-81 Viaduct Project
333 E. Washington St.
Syracuse, NY 13202

~~13066~~ 13224

ZIP CODE

Dear Department of Transportation,

When planning the reconstruction of I-81, please take my following comments into consideration:

DOT must create a relocation plan.

nyclu.org/i81 | #LetsTalkAbout181

Legacy pollution must be remediated for property dwellers south of Adams St.

nyclu.org/i81 | #LetsTalkAbout181

30% people of color and 30% local hiring requirement in EIS.

nyclu.org/i81 | #LetsTalkAbout181

1. You need a plan! 2. DOT property must be given to Native Amer. pop (1/3), African Amer. pop (1/3) and Developers (1/3)
3. Hire a top notch urban designer - not only trans. specialists

To: NYS DOT
From: Maren King and John King
Date: October 13, 2021
Re: I-81 DEIS comments

I-690 Over N. Franklin Street - Underpass and Street/Sidewalk Design

- DEIS Reference Drawings Bridge Plans and Elevations CG-2-3142 (2 of 3) and CG-2-3143 (3 of 3).
- General Plan Clinton St Community Grid Alternative CommGrid Alt. GP-CG-590-01 and GP-CG-590-02A

We appreciate that on the bridge drawings there appears to be approximately 20 feet of clear space for pedestrians (and bicyclists) where N. Franklin Street passes under I-690 and the I-690 WB off ramp. As it exists now, our experience walking under 690 at Franklin Street almost daily is frightening, dangerous, dirty and in winter it can be impassable for weeks due to snow plowed from the street onto the sidewalk. The proposed width for pedestrians will provide support for a safer and more pleasant experience for the many people walking in this area, on both sides of the street.

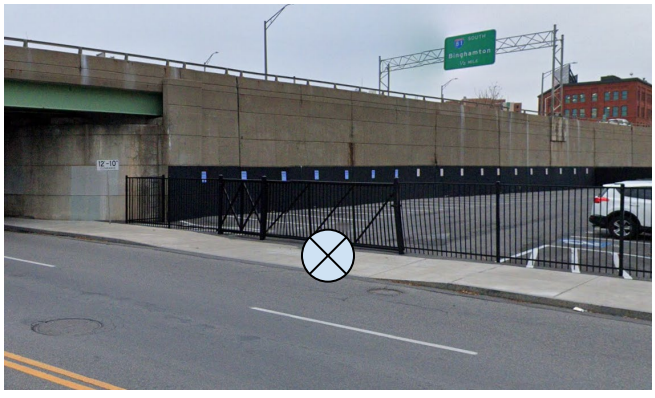
We note the proposed on-street parking and anticipate that this will slow down passing cars and provide further protection for pedestrians, in addition to providing parking for local businesses.We wonder if the city will install parking meters.

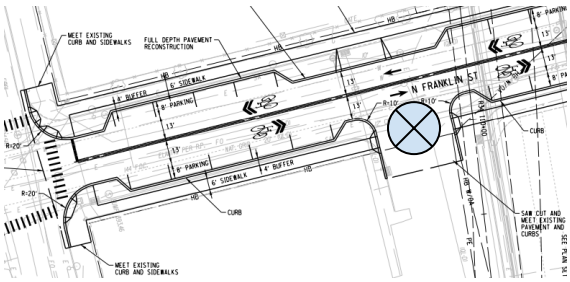
We recommend the following;

- Ensuring that the pedestrian zone remains clear of snow, road salt and standing water splashes throughout the year by installing some type of barrier, such as a low wall of 30” height about 4’ in from the curb line.
- Rather than the “6’ sidewalks” shown on the bridge drawings and on the “General Plan”, make the entire non-vehicular area an attractively paved walking space with detailed paving pattern, pedestrian scale lighting and public art.

Considerations such as these should be given to all locations where pedestrians are walking under the highway.

Shown on the General Plan, south of the I-690 overpass, why is the proposed sidewalk not continuous where there is a driveway from the adjacent lot? Existing conditions are a continuous sidewalk. And across the street there is a similar situation with driveway access but the proposed sidewalk is continuous. (See images below)





Butternut Street Bridge

- General Plan Clinton St Community Grid Alternative CommGrid Alt. GP-CG-590-02A, 590-3A and General Plan Salina S/State St Comm Grid Alt. 590-32.

The drawings illustrate more generous sidewalk widths, separate bike lanes and two driving lanes. This is a big improvement from the existing bridge crossing experience for pedestrians on narrow sidewalks and no facilities for bicyclists. However, currently vehicles drive very fast over the length of the bridge, picking up speed to and from State Street creating unsafe, frightening and uncomfortable situations for those of us who walk across the bridge, and would use it more once the conditions are improved. We believe that more could be done within the proposed bridge design width to slow vehicular traffic and to make the pedestrian and bicycling travel experience more safe and perhaps almost pleasant.

To slow vehicular traffic, we recommend combining the proposed pedestrian walkway (6'wide), the bicycle lane (4'wide), and the buffer (4' wide), to create a shared 14' walking/bicycling corridor all above the street curb on both sides of the bridge. The driving lanes should be lined to be 11' with 1' "shoulders".

It would also be helpful to buffer the traffic noise from the fast moving cars below, since it is extremely loud and an overwhelming sensory experience. Consider the opportunity to integrate noise buffering panels into the protective fence structure that could also contain culture related artwork. Another option to reduce traffic noise from the highway would be to keep traffic speeds lower until north of the Bear Street Bridge.

Existing Tree Cover and Buffer, and Evans Street "park " space. North of Mission Landing, 429 N. Franklin Street.

- DEIS reference drawing General Plan I-690 westbound community grid Alternative GP-CG-H40-05

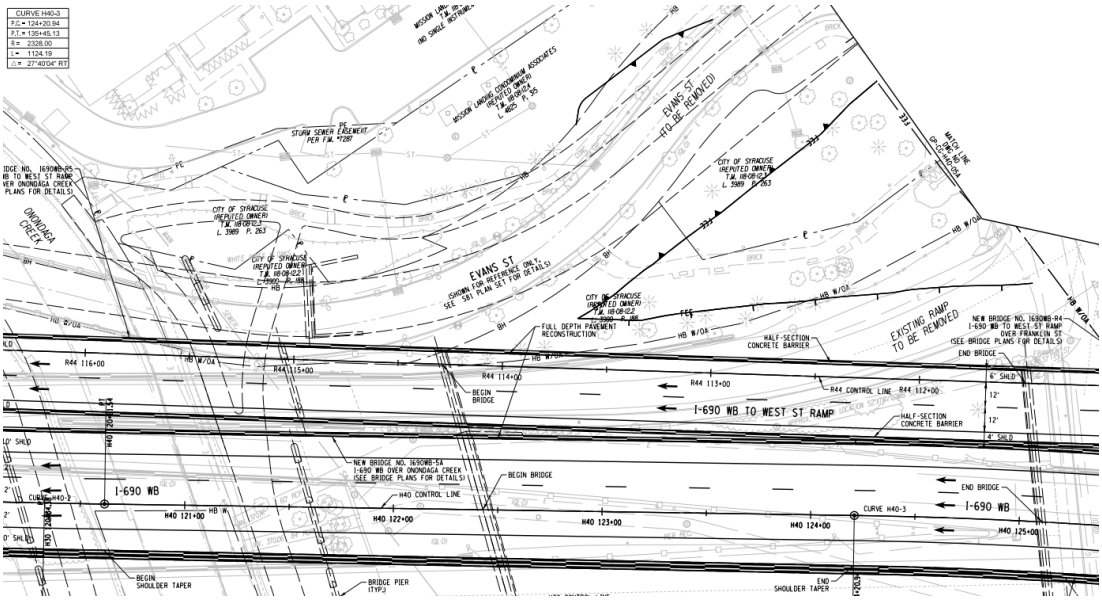
The existing landscape south of Mission Landing, a 43 unit residential condominium building, is characterised by mature deciduous and evergreen trees. This dense tree canopy is important for many reasons, including that it blocks or buffers our views toward I-690 and the existing West Street on-ramp at Butternut and N Franklin St from ground level views and for home owners whose units look out toward the south. To some extent these trees also provide air quality benefits and and as a small but robust section of urban forest, they improve the quality of life for residents and visitors to this area of Franklin Sq. The removal of these trees will create adverse impacts and needs to be mitigated. We request that Mission Landing residents and other interested Franklin Sq residents be involved in the detailed design process to determine the final design and layout of the landscape elements, including replacing at least all of the trees to be removed, for the area between Mission Landing and the new highway infrastructure.

It is unclear on this drawing how many and which trees will be removed due to removal of the existing ramp and construction of new ramp, removal and construction of new Evans Street, and removal of existing Creekwalk stairs and construction of new pedestrian ramp system to Creekwalk. (See screen shot on next page of area in question.)

A recent count of the existing trees includes:

- *Evans St "Park"* - approximately 35 medium to large trees, mix of evergreens and deciduous, and 3 or 4 large deciduous shrubs.

- *North side of Evans St between street and south edge of walkway between N Franklin and Creekwalk* - Approx. 25 planted medium to large trees mostly deciduous with a few evergreens.
- *North side of Evans St, north of sidewalk, on slope of ML or adjacent property* - 13 trees, mostly medium to large evergreens and 5 - 6 large deciduous shrubs.
- *Along south edge of ML parking lot and driveway* - 10 large deciduous trees



View from Evans St to ML

View from ML to Evans & 690

Walkway - Evans to Creekwalk

The above photos were taken in spring several years ago. Even without leaves the deciduous trees in combination with the evergreens provide an effective visual buffer.

Thank you for your attention to and consideration of these comments. We will look for your response in the FEIS and welcome the opportunity to be involved in discussion about more detailed design of the areas we have highlighted.

Sincerely,
Maren King and John King
429 N Franklin St Apt 2-107
Syracuse, NY 13204
maren.king@gmail.com

October 13, 2021

Mr. Mark Frechette, PE
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Re: Comments on the I-81 2021 Draft Environmental Impact Statement

Dear Mr. Frechette,

We are taking the opportunity to provide comments on the I-81 project with particular focus on the Almond Street corridor and related areas. In our association with urban and community design through the SUNY ESF landscape architecture department, we have particular interest in how this transportation infrastructure can benefit and support the neighborhoods that have been impacted by the existing highway system for so many years. Comments addressing other areas of the project including the Northside and Franklin Square are being submitted with other partners.

Lack of an Urban Design "Vision"

One of the major issues facing the project, especially as it passes through Syracuse as "BL 81", is that this major segment is being designed without a comprehensive urban design vision to guide its integration into the heart of the city of Syracuse. Sixty years ago urban renewal tore apart the existing dense urban fabric, making way for the I-81 highway and the development of several stand-alone institutional, cultural and residential structures and complexes that to this day remain separated from each other and surrounded by surface parking. The DOT's own analysis illustrates these existing conditions of the Almond Street corridor north of Adams Street. (See "Existing Parking Study" figure – DEIS p5-52)

This project has been in the public eye and planning for at least 10 years and over the past three years the attention of most of those engaged in the process has been on determining which alternative would be most suitable to replace the deteriorating viaduct. We support the selection of the Community Grid as the preferred alternative while at the same time recognize that there is much room for improvement. While there have been conceptual proposals created by several independent groups illustrating ideas for the urban design vision in support of the community grid alternative, none of these have been community based or seem to have the support of the city government.

There is no collective or shared urban design vision to guide the transportation investments that are now approaching an advanced level of design and required environmental review. The DOT's consultants have created illustrative plans and images that show the basic character of the roads, sidewalks, bicycle facilities and site improvements within their right -of-way, but the DOT has made it very clear that it is not within their scope to prepare an Urban Design Plan for

the areas through which their road systems is proposed to run. We plan to follow up with the City on this concern and we urge the DOT to consider providing resources to hire an outside urban design firm to work with the city and the DOT to create a plan that finally integrates land use and transportation into a cohesive vision now that the community grid alternative has been selected.

This Vision should include goals, principles, and conceptual design illustrations for the lands fronting on Almond Street as a major entrance to the city, a revived district and distinct place. It should focus human scale connection between districts that are currently separated by the existing transportation infrastructure, including the neighborhoods of the Southside, East Adams, Near Eastside, University Hill and Downtown.

The Urban Design Vision is also needed for the Near Eastside neighborhood, through which there will be major vehicular access via Crouse Ave and Irving Ave between University Hill and I-690 providing high speed highway access to the western, northern and eastern suburbs. This includes much of the vehicular traffic that formerly used the Adams Street and Harrison Street ramps to/from the viaduct. As with Almond Street there is not a publicly created or vetted plan for this area which used to be the location of Kennedy Square Housing, formerly home to several hundred low income residents and now owned or controlled by Upstate Medical University.

Reconnecting Neighborhoods and Districts

I-81 has physically and visually divided the east and west sides of Syracuse since its construction in the 1950's and 60's. In Chapters 3 and 6 (Section 6-2-1) of the DEIS, the NYSDOT describes the Community Grid Alternative as an improvement to the current I-81 corridor that will reconnect neighborhoods. It implies that the removal of the elevated viaduct and creation of a multimodal "complete street" will improve neighborhood connectivity and cohesion between Downtown and the Southside and University Hill and Near Eastside Neighborhoods. While the removal of the elevated highway will dramatically improve some aspects of connectivity, more needs to be done to reconnect the divided neighborhoods and districts and to not inadvertently create new barriers.

As can be seen with the creation of multimodal rights-of-way along Erie Blvd. and West Street, providing a bike lane and sidewalks is not enough to create an environment where pedestrians and cyclists choose to travel. Neighborhood connectivity requires a vision and detailed plan to draw people not just along it, but also across the corridor.

1) Existing Almond Street in the area of Pioneer Homes runs between two sections of that housing development and it is common to see residents crossing the two-lane roadway. In the proposed design, while the appearance of the corridor is greatly improved, there will be four lanes of traffic at grade creating a wider pedestrian crossing. In one several hundred-foot section adjacent to Pioneer Homes the DOT has proposed a raised planter in the median presumably to discourage pedestrian crossing and encourage them to use widely spaced

signalized intersections. Not providing a logical and convenient pedestrian crossing reduces the existing connection between the two sections of Pioneer Homes and could potentially result in people trying to cross over the planted median.

2) While the DEIS states that the transportation infrastructure in the proposed Almond Street corridor is not as wide as the existing, it appears that the design encompasses just about the entire width of the existing ROW owned by the NYS. In the section north of Adams Street, pedestrians will have to cross the width of 4 to 5 driving lanes, two parking lanes and bicycle lanes. While we support the multi-modal basis for the design, reducing the width of certain system elements should be considered, relative to the urban design vision and potential redevelopment of properties adjacent to front on the new Almond Street.

3) Minor improvements to Harrison Street and Adams Street west of the Almond Street corridor are proposed as part of the Community Grid alternative. While both streets create physical barriers to north-south connections due to their excessive width, Adams Street seems to also present a visual and psychological gulf between the East Adams St Neighborhood and Downtown. The proposed improvements do not change the overall widths but rather use that space to introduce two-way traffic. There should be study of ways to reconnect the Southside neighborhoods with Downtown by improving the pedestrian and human scale aspects of these corridors, such as increasing the width of the pedestrian realm, reducing the pedestrian crossing width and reducing driving lane widths. (If this is not possible in the DOT funded projects it could be coordinated as a related City project).

<u>The Need to Design for Multi-modal transportation with different movement speeds and perceptual characteristics</u>

The design to date as illustrated and documented in the DEIS is most developed and appropriate for moving vehicles at various speeds through the project area. The designs provided for the pedestrian oriented corridors and spaces are very stark and do not illustrate consideration for the perceptual characteristics needed to support and encourage people walking at 3 to 4 mph.

The pedestrian system as it is currently illustrated and described is based on “accommodation, connectivity and safety” (DEIS p5-184). These are reasonable and baseline objectives but do not acknowledge human behavior research of the perceptual characteristics of people walking. In designing a multi-modal system that supports and encourages all modes of transportation, there should be equal consideration and knowledge about the different needs and requirements of each mode. The DOT is skilled at designing corridors for motorized vehicles such as cars, trucks and buses but the current designs do not acknowledge a similar expertise with pedestrian oriented environments. In addition to the baseline objectives, environments that encourage, and support walking are characterized by more detail, interesting things to look at, environmental comfort, including shade, places to sit and possible gather, and an understanding of humanscale.

There are numerous design characteristics that affect driving speeds, including the width of the vehicular lanes. Proposed lane widths on surface streets appear to be 12' minimum on many new or reconstructed streets. Contemporary standards for local streets recommend narrower lane widths, and we recommend 11' maximum widths to slow driving speeds. We have noted that the I-690 lanes in the vicinity of Franklin Square are shown on DEIS drawings as 12' wide, and we do not think that width is needed or appropriate for local streets.

Lack of relationship to Syracuse history, character and culture.

While the illustrations and visual representations are at first glance appealing in their clean lines, trees and sidewalks filled with people walking, they are generic and do not represent a realistic scale and vision that is appropriate for Syracuse. This design could be anywhere, and seems overly large and without characteristics that represent the culture and character of this community and region.

The I-81 replacement roadway is being planned within urban neighborhoods that have a rich history and sense of place. This landscape includes identified historic properties and districts in the Downtown core and Southside, the historic designed landscape of Oakwood Cemetery, and older neighborhoods that have a distinct character and culture. In addition, there are places that were destroyed through urban renewal and highway construction that should be remembered and reflected in the design of the new roadway.

The Southside neighborhood (former Village of Danforth) demands the same attention in the I-81 rebuild as Downtown. The Southside was impacted by the construction of I-81 on an elevated embankment that required the demolition of streets, houses, and the neighborhood's connection to Oakwood Cemetery. I-81 siphoned off traffic that provided the economic underpinning of South Salina Street (US 11) from Brighton Avenue north to Downtown. Oakwood Cemetery, which was connected to the heart of Syracuse, was impacted through loss of its entranceway and superintendent's residence, which isolated its historic gate, office building, chapel, and the original burial sections. The ongoing effects of I-81 over the decades since it was built include noise and visual pollution, vandalism and loss of viability to the original section of Oakwood Cemetery, decreased neighborhood value, and separation of a community from its historic greenspace and most prominent burial ground.

Cultural and Historic Preservation

The I-81 replacement at-grade roadway (Community Grid) should be extended south of the current planned terminus at Martin Luther King School to I-481 to provide renewed connections and reduce noise and sound pollution on the adjacent neighborhoods and historic Oakwood Cemetery (local landmark and listed in the National Register of Historic Places).

The I-81 replacement roadway should reflect Syracuse's distinct sense of place through design that integrates it with adjacent city streets in its dimensions, materials, and furnishings that

speak to the present time, but also relate to the history of Syracuse. It should seek to return, where possible, the alignment of streets that were removed for the construction of I-81.

The design of the planned “Canal Corridor” requires careful planning to ensure it is authentic to the history of the area where the Erie and Oswego canals joined.

The I-81 Viaduct Project should seek to correct the environmental injustice that its construction and ongoing use has caused. Specific to the history and culture of Syracuse, recommended mitigation measures include:

- Designing the replacement roadway to allow the reintroduction of access through the Oakwood Cemetery main gate.
- Funding to mitigate the damage indirectly caused by I-81 to Oakwood Cemetery’s main gate, old office, chapel, and road system.
- Funding to rehabilitate housing and city streets in the adjacent neighborhoods that have been impacted by I-81.
- Development of a signage system that reinforces the identity of Syracuse neighborhoods through which the new road will pass.
- Development of signage, markers, or a public art program that celebrates the history of Syracuse and the neighborhoods and landmarks that were destroyed for I-81 and the larger urban renewal program.

We thank you for the design, changes and attention that have been given to this project on behalf of Syracuse and the wider Central New York community. This project has the potential to improve the environmental quality and social interactions of the neighborhoods and districts that adjoin it, as well as the travel experiences of those that will use it to reach destinations in and beyond the city. We hope that the design process, construction and final outcomes serve as models of 21st century, forward thinking transportation planning.

Sincerely,

Maren King, Associate Professor, SUNY ESF
Mary Martin, Graduate Student, SUNY ESF

From: Frechette, Mark (DOT)
To: Bjorness, Joan E (DOT)
Subject: FW: I-81 DEIS (Syracuse) comments
Date: Friday, October 15, 2021 10:09:57 AM
Attachments: Peter-King_I-81-Comments.pdf
Append-A)_Hunt+(2011)_Fig-2.pdf
Appened-B)_Atmosph-Inversions-Syracuse.pdf
ULTRA_Special_Issue_Heisler_120706.pdf

Some of these I didn't see…

From: Gross, Jared A (FHWA) <jared.a.gross@dot.gov>
Sent: Friday, October 15, 2021 9:48 AM
To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>
Subject: FW: I-81 DEIS (Syracuse) comments

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

From: Peter King <pking271@pm.me>
Sent: Thursday, October 14, 2021 11:51 PM
To: Gross, Jared A (FHWA) <jared.a.gross@dot.gov>
Subject: Fwd: I-81 DEIS (Syracuse) comments

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Jared Gross,

I wanted to be sure someone at FHWA received my comments on the I-81 project in Syracuse.

You are listed as the Area Engineer for FHWA, the Lead Agency, on this page:

https://www.permits.performance.gov/permitting-projects/i-81-viaduct

Please see my message for NYS-DOT below for details.

Thank you,

Peter King, Syracuse.

-------- Forwarded Message --------

Subject: I-81 DEIS comments

Date: Fri, 15 Oct 2021 03:46:01 +0000

From: Peter King <pking271@pm.me>

Reply-To: Peter King <pking271@pm.me>

To: dot.sm.mo.I81Opportunities@dot.ny.gov, I-81 Opps <I81Opportunities@dot.ny.gov>

Hello NYS-DOT,

I understand from my reading today, you formally stopped accepting comments on the DEIS this afternoon at 5pm.
I ask that you please accept my comments here, as I thought we would have until the end of the day.
Can you let me know if this is acceptable?

Thank You,
Peter King
101 Hurlburt Road, apt 3,
Syracuse NY, 13224

Sending here 4 documents.
Peter Kings Comments
Appendix A and B,
Heisler et al 2012.

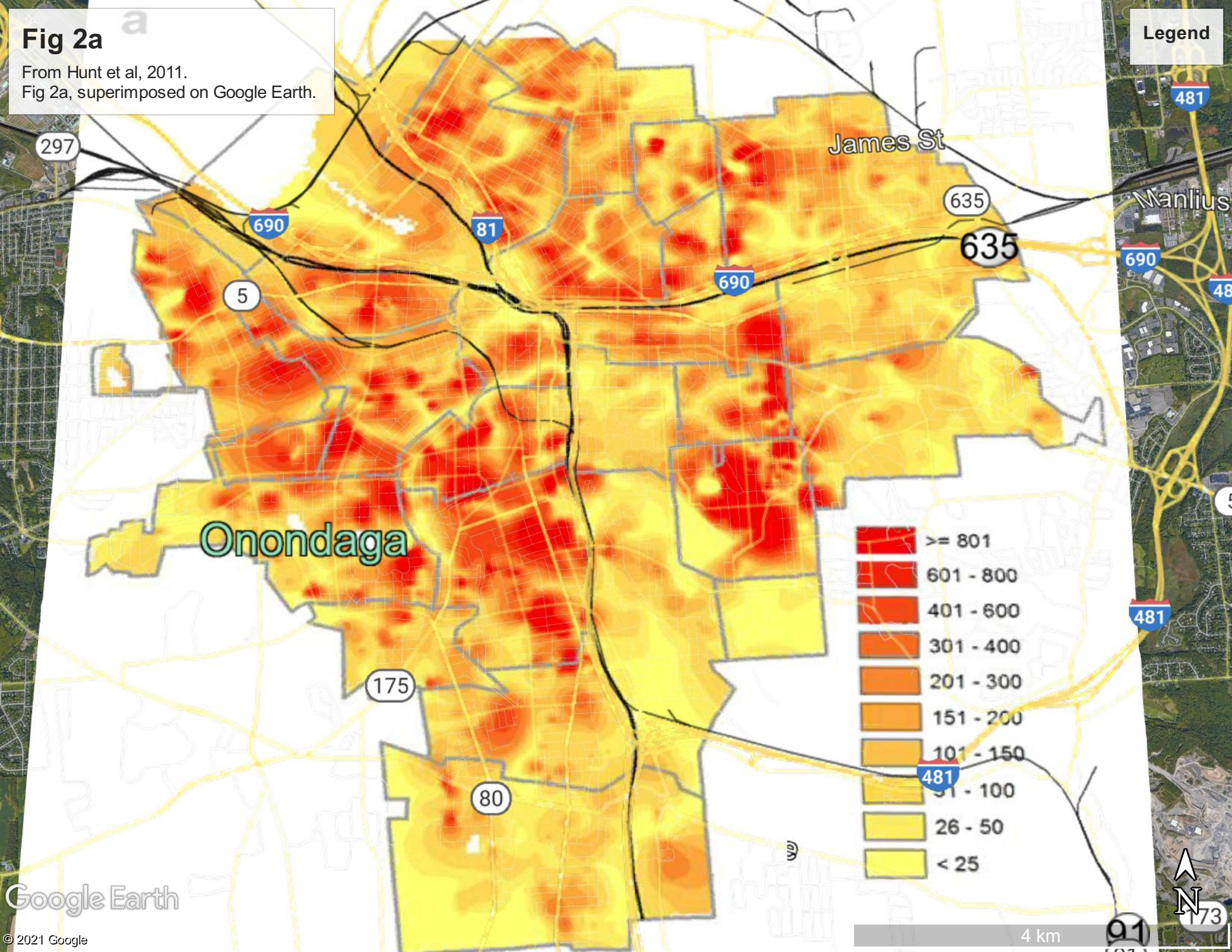
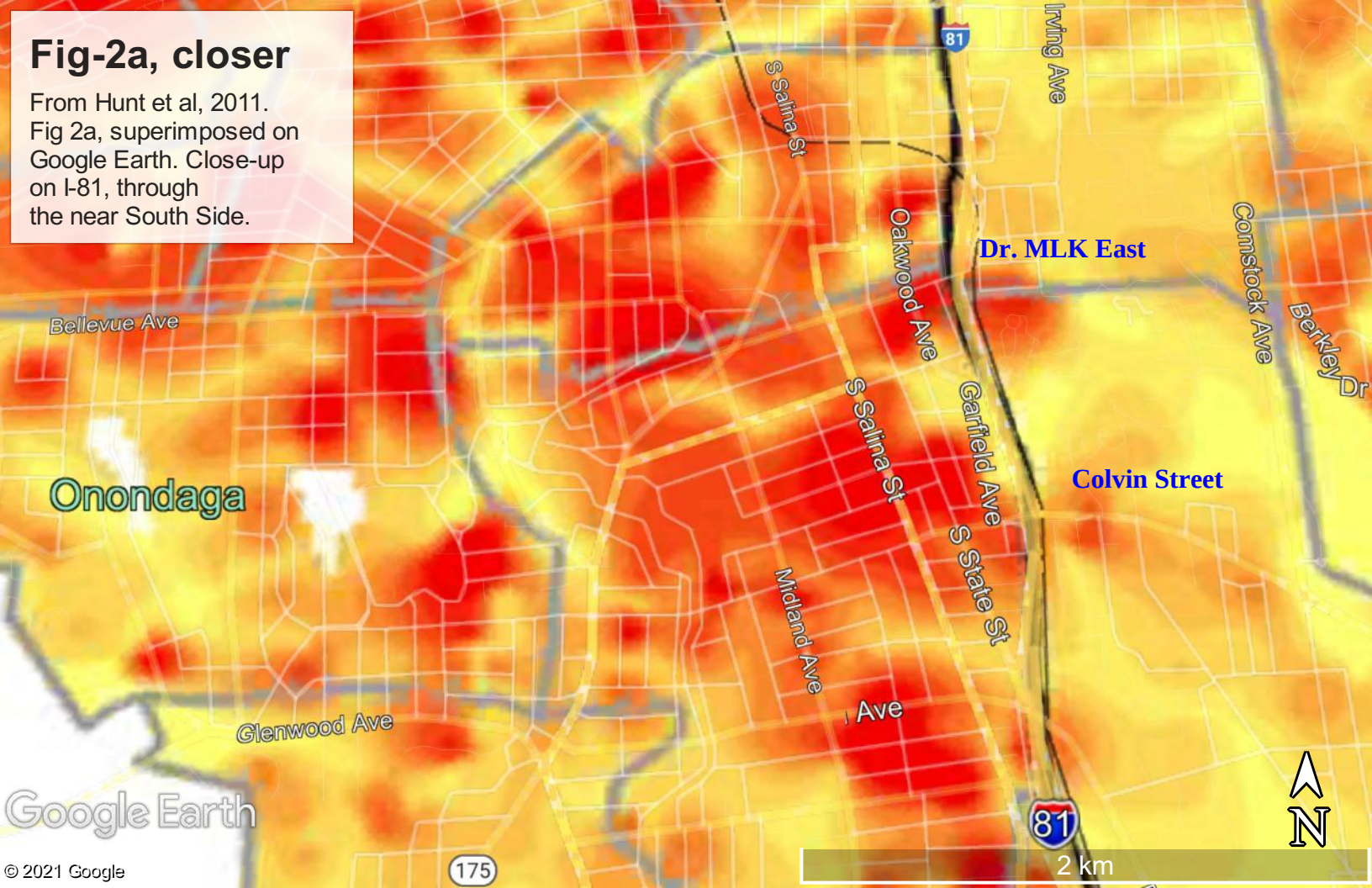


Fig 2a
From Hunt et al, 2011.
Fig 2a, superimposed on Google Earth.
Legend
>= 801
601 - 800
401 - 600
301 - 400
201 - 300
151 - 200
101 - 150
51 - 100
26 - 50
< 25
Onondaga
James St
Manlius
297
690
81
635
5
175
80
481
173
91
4 km
N
Google Earth
© 2021 Google

Fig-2a, closer

From Hunt et al, 2011. Fig 2a, superimposed on Google Earth. Close-up on I-81, through the near South Side.



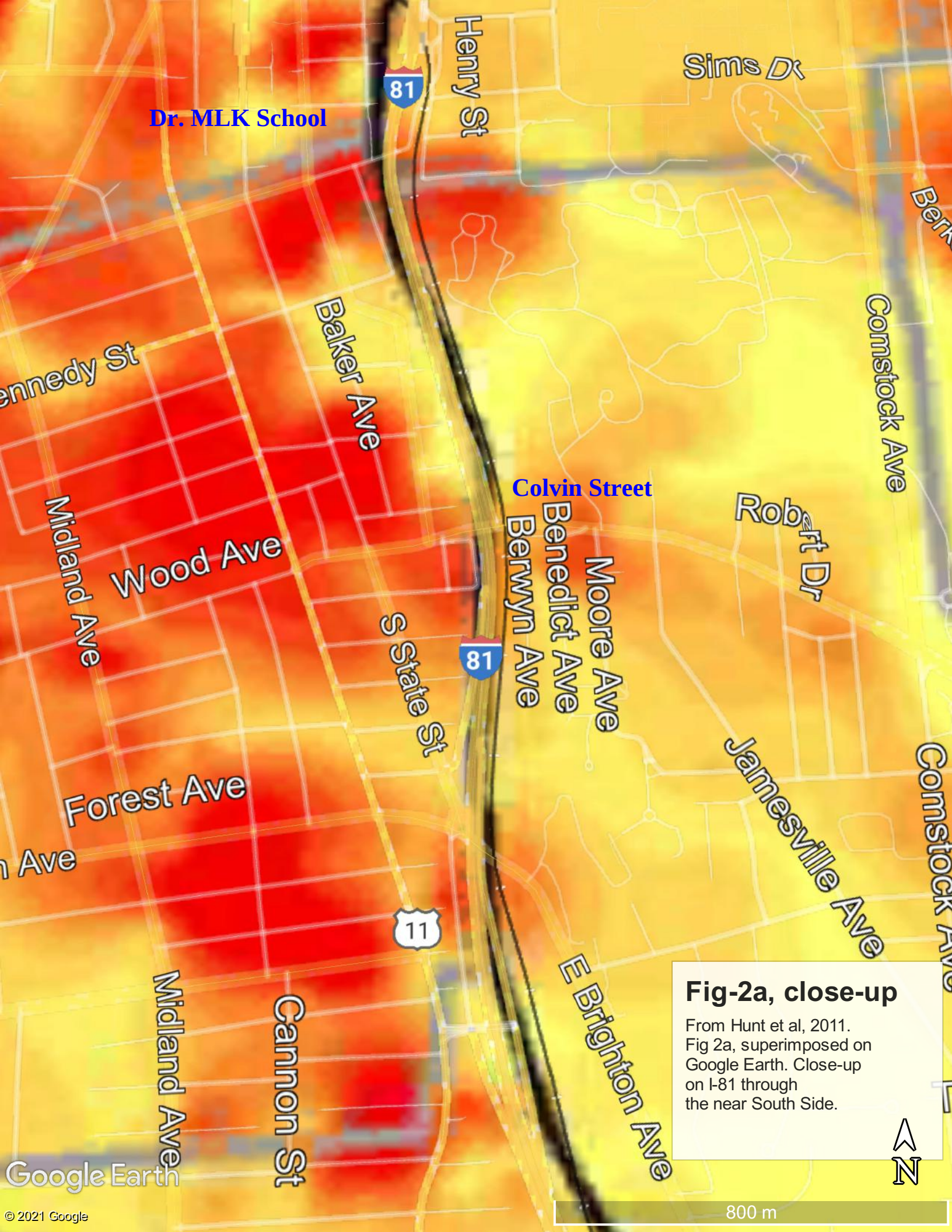


Fig-2a, close-up

From Hunt et al, 2011.
Fig 2a, superimposed on Google Earth. Close-up on I-81 through the near South Side.

I-81 Comment, Appendix B) Inversion potential in the Central valley, as a concern for I-81's design through the South Side. *~ Peter King, Syracuse*

I present some charts here for demonstrating in the simplest terms possible, a description how localized atmospheric inversions over Syracuse's central valley, maybe capping air masses within the valley, including pollutant buildups. I agknowledge here, local micro-scale inversions may occur within higher and larger, area-wide or even regional inversions. I began with Heiser et al's unpublished manuscript about Summertime micro-climate air differences occuring throughout the central Syracuse valley, describing how cold-air drainage is likely the dominant topographical forcing function in Syracuse, after sunlight and the seasons.

Heisler et al describe cold air drainage as defininig a general daily wind flow through the central valley, given otherwise calm weather. Cold air drainage is often known in the literature by 'anabatic' or upslope and 'katabatic' or downslope winds. Generally speaking, winds may blow upslope in the mornings, and downslope evenings, driven by temperature and air pressure differences. As I mentioned in my 2014 comments on I-81 for DOT, the problem with having a major road between a sudden slope on one side, and dense residential neighborhoods on the other, is how air currents may wash down over the roadway, carrying pollutants into the valley. Related with that concern, I am inquiring here about a related local climatic issue, where as the NYS DEC observed in their 1970 Central New York air quality report, Syracuse is prone to atmostpheric inversions, often in the late summers and fall (NYS-DEC, 1970).

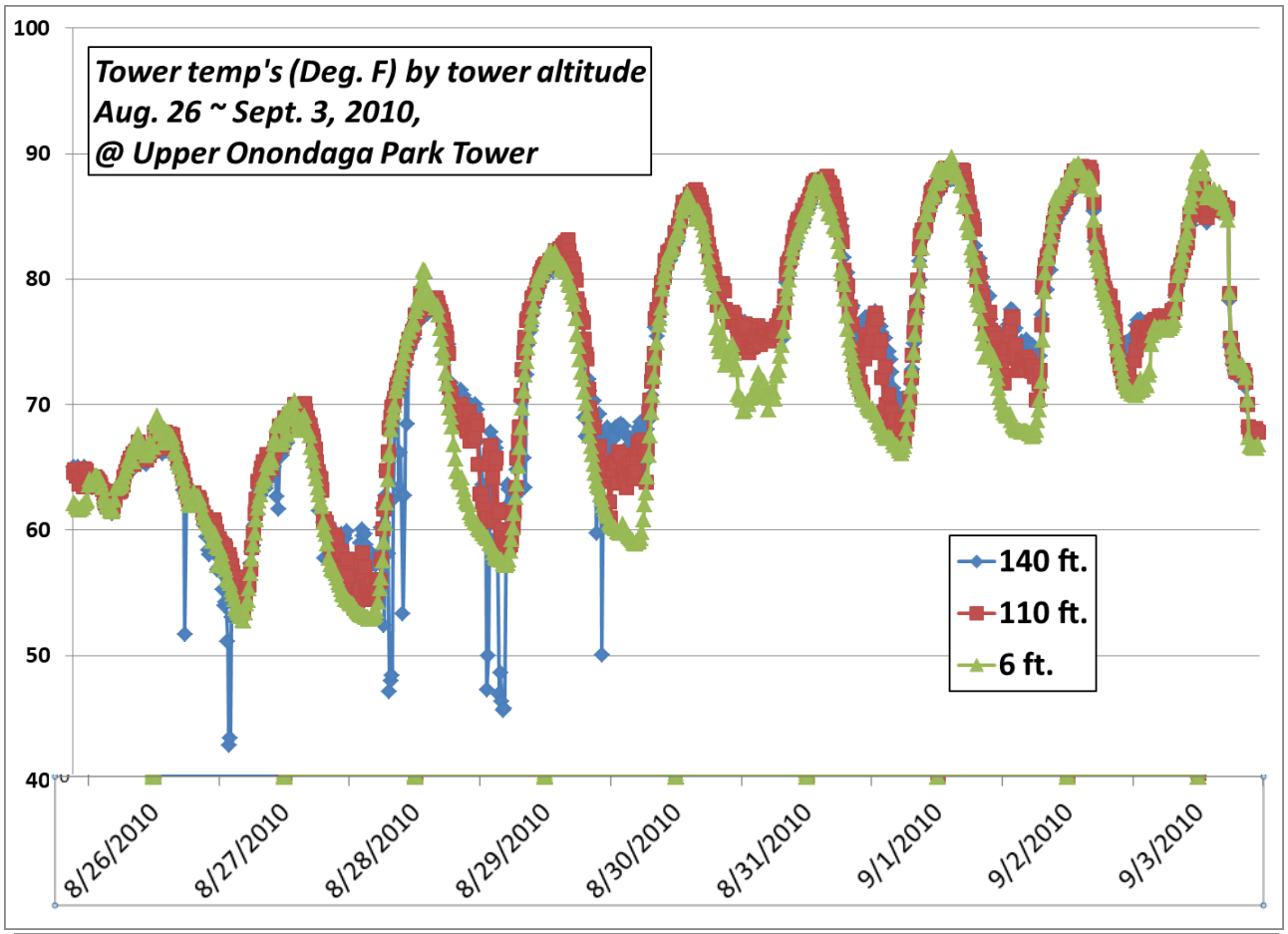
In some cases, the cold-air drainage Heisler et al observe can introduce a useful atmospheric instability into inversion-prone areas. If the goal is reducing local air pollutant concentrations, air currents can disrupt calm air masses, and so prevent a calm inversion layer from forming overhead. However, as DEC observe, at times the air mass over Syracuse becomes so calm, inversions form which can become stronger than any regular downslope breezes. Possibly, as the large paved surface of I-81 along the valley is storing sunlight and re-radiating it as heat, this heat may feed localized or valley-scale inversions, increasing their likelyhood.

In the case described by Heisler et al, high late summer temperatures in Syracuse are matched by increasingly stagnant or stable air masses, as indicated here by a higher 'Turner Class', 1 indicating unstable and 7 being very stable air conditions.

Method: I obtained basic weather data collected by Environmental Monitoring at SUNY-ESF in Syracuse, from a weather monitoring tower at the Fire barn in Upper Onondaga Lake Park, overlooking the West side in Syracuse. Weather tower data can be useful for revealing patterns occuring above the microclimates below. In this case I refer to data collected at three altitudes on this tower: 6 feet or ground level, 110 feet and 140 feet.

The tower itself is 164m in elevation, compared with 181m for the hilltop along Oakwood Cemetary over I-81, and 131 for I-81 itself. The low points in the valley seem around 120m elevation. So compared with I-81, the Firebarn Tower is ~30m above, and across the valley. Note, the small backyard weather stations used in Heisler, et al are also located at several alitudes: the 'Valley (8)' station in 'Fig. 11' below was located at 132m, the 'suburban-hill (1)' station was upslope at 254m, and the reference (9) was downtown by the Center of Excellence at 123m (Table 2, pg9, Heisler et al 2012).

For each 15-minute interval in this dataset, I calculated temperature ranks, and the differences from the minimum temperature. I post basic temperature readings for the same time period Heisler at al document, Aug. 26 through Sept 3, 2010, in Graph A) below.



Graph A) Basic temperature readings from monitors on three altitudes of the Upper Onondaga Park weather tower, for the same time period documented in Heisler et al (2012), fig 11: Aug. 26th through Sept. 3rd, 2010. In Fig. 11, Heisler et al (2010) observes highly stable air masses occurring in the evenings and nights, as the temperature cools in the valley. (Next)=>

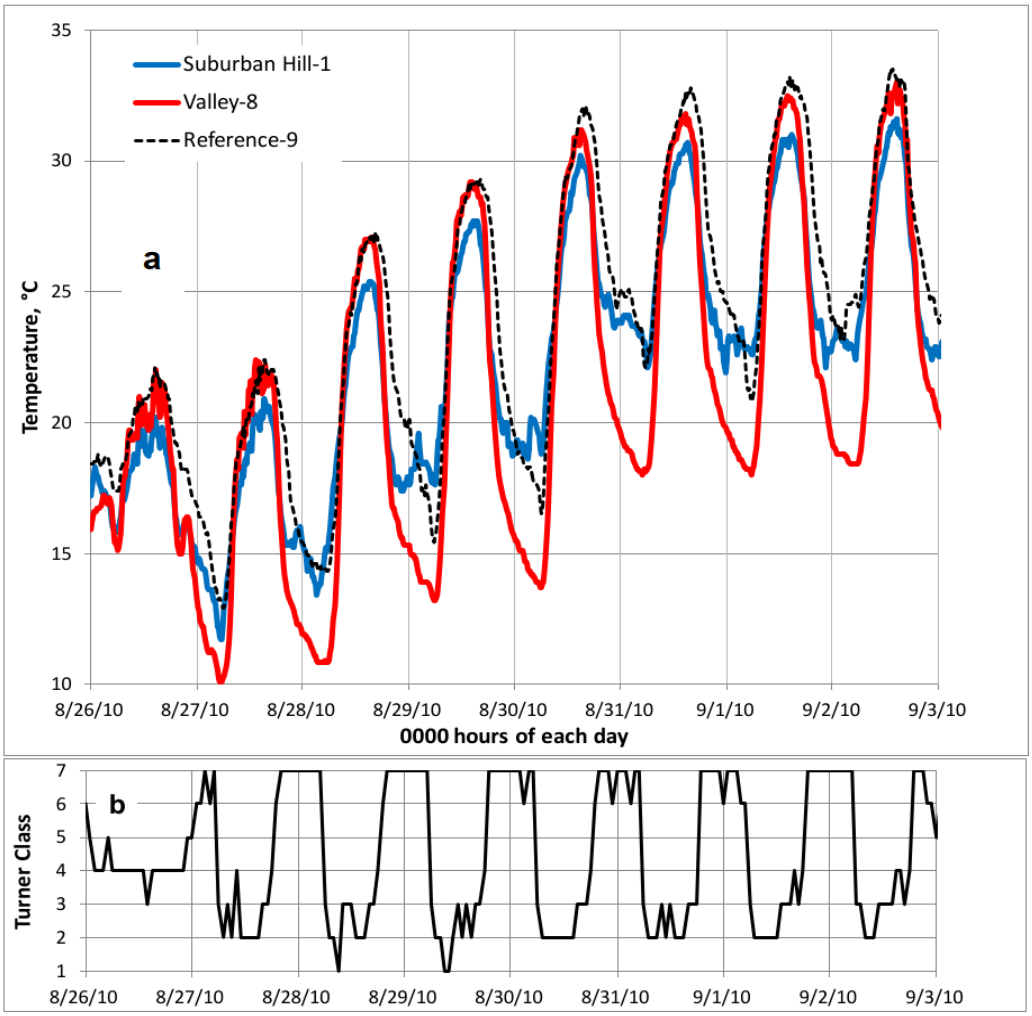


Fig. 11 Patterns of measured temperature at three Syracuse sites with varying urban structure and topographic position **a**, and Turner class by hour of the day **b**.

(From: Heisler, et al, 2010, pg. 22) Note how atmospheric stability as denoted by 'Turner Class' seems rising here nightly, as the temperatures drop nightly. Also note how both temperature and Turner class seem increasing over this 9 day period. The Valley (8)' station was located in the City's Valley district at 132m altitude, the 'suburban-hill (1)' station upslope at 254m, and the reference (9) was downtown by the Center of Excellence, at 123m altitude (Table 2, pg9, Heisler et al 2012).

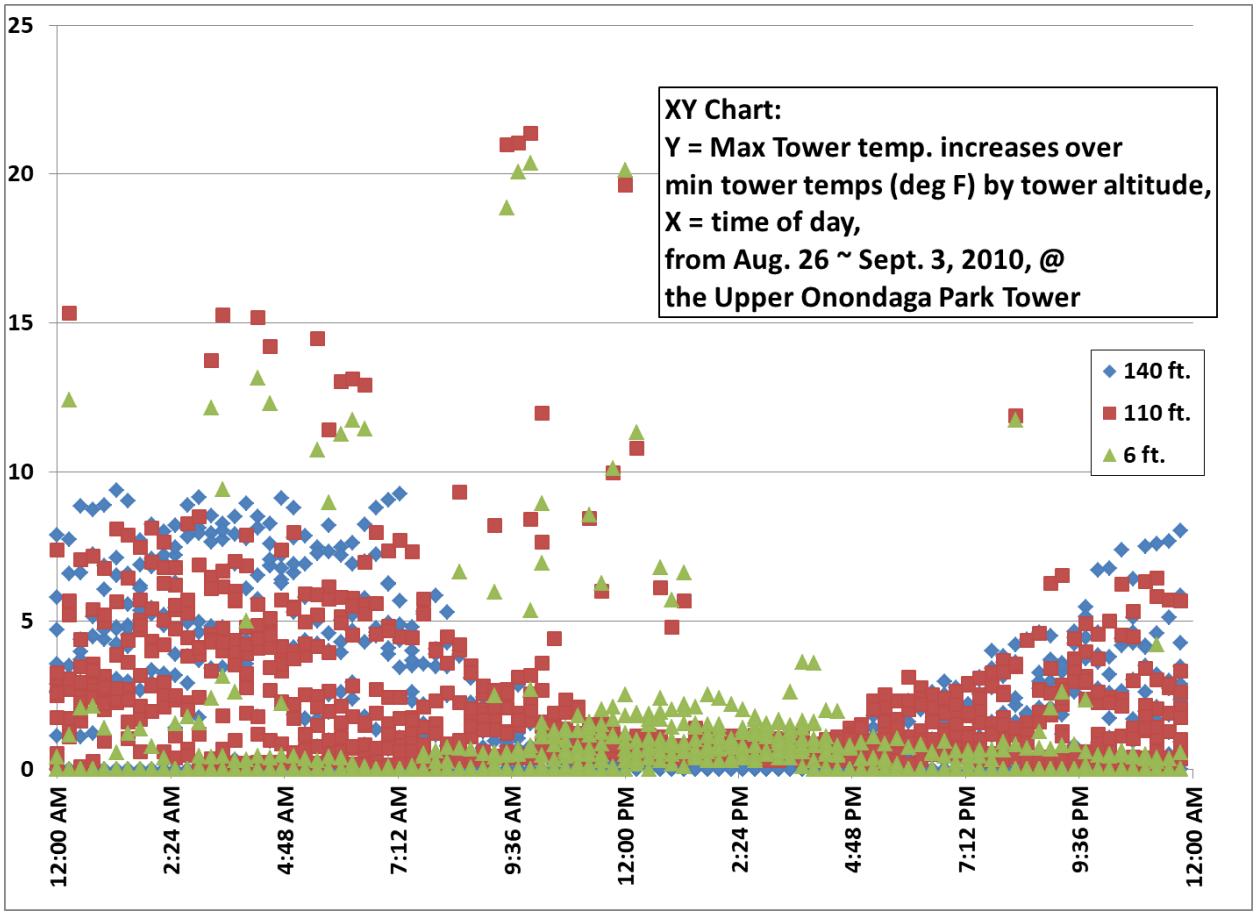


Chart B) Temperature differences from minimum temperatures among 3 tower monitors, plotted against the measurement times, during Aug. 26th-Sept 3rd, 2010.
Compared with Fig. 11 from Heisler et al 2010 above, the weather tower temperatures here are rising in the evenings and nights, while the valley temperatures are falling. (Next)=>

In this xy scatter chart, we see the range of Tower temperature increases over the minimum tower reading, as measured among 3 tower thermometers: 6 ft. or ground-level, 110 ft. and 140 ft. levels. Let's compare these data with Heisler et al's data from the same time and dates, but from the valley bottom, nearby hillside, and and Center of Excellence (dotted line) (Heisler et al, 2012).

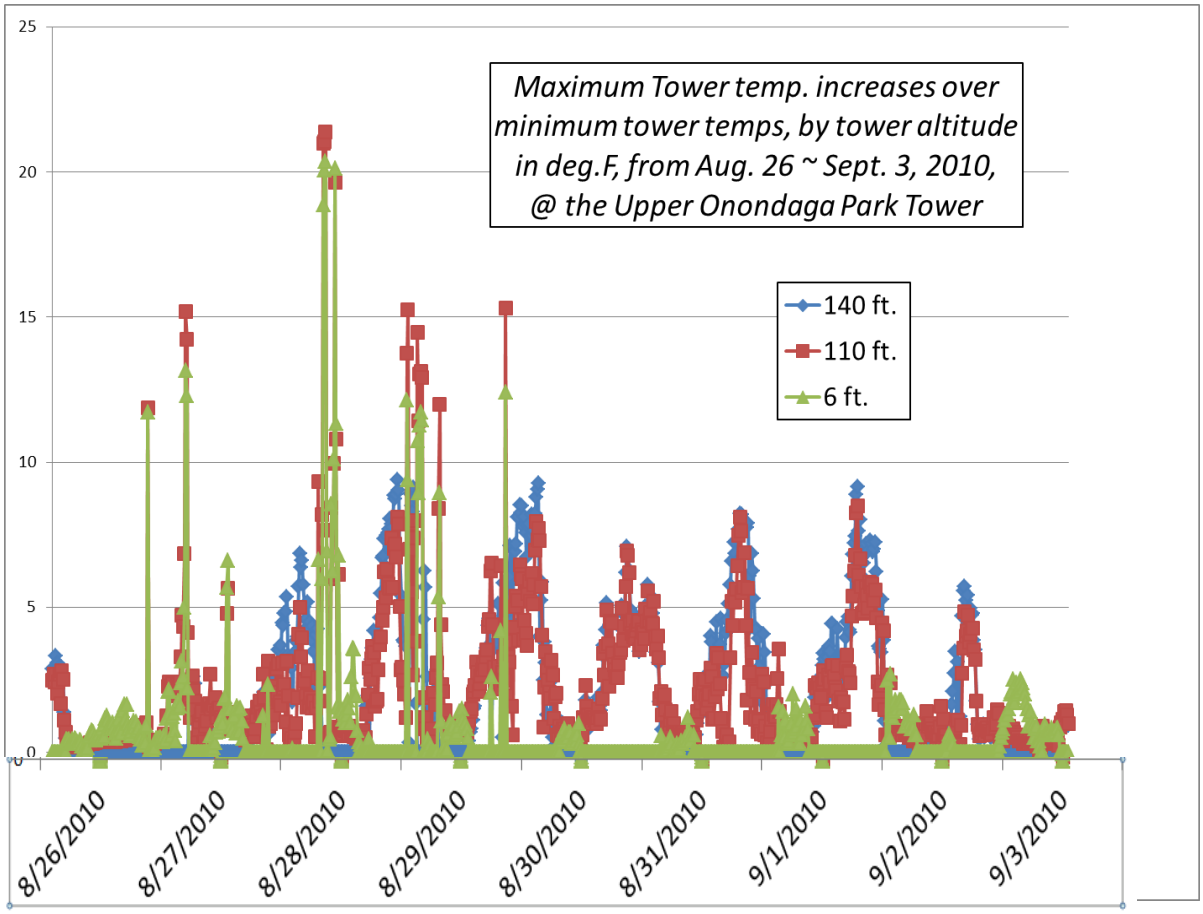
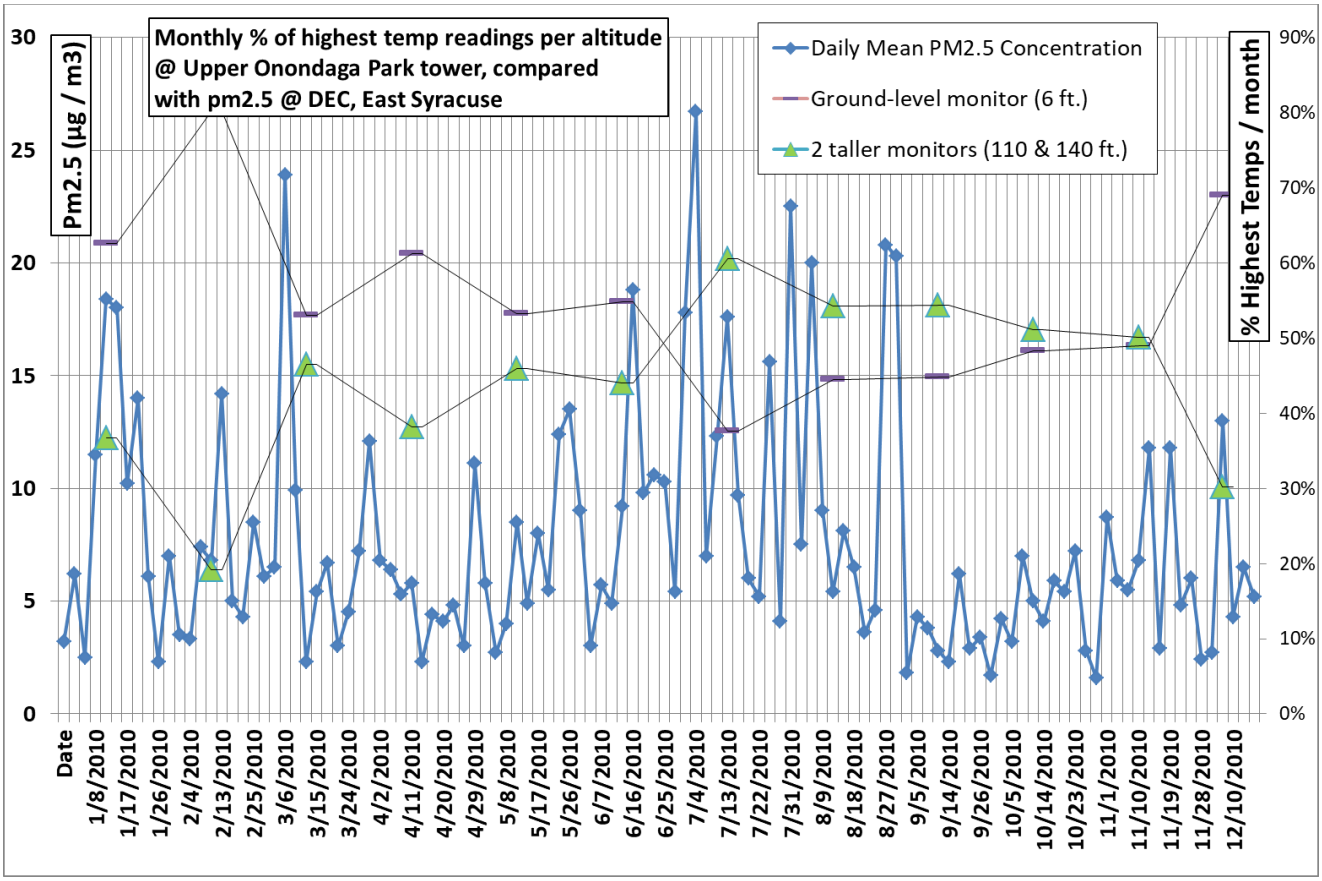


Chart C) Here I chart the same Temperature differences from minimum temperatures among 3 tower monitors, simply by date. As Heisler et al document increasingly stable and warmer weather in Fig. 11, the higher altitude tower monitors are reporting warmer temperatures. Warmer air masses above ground usually indicate atmospheric inversions.

Heisler et al note large nightly temperature decreases in the Valley, South of the South Side. At the same time but a higher elevation at Upper Onondaga Park, we can see a corresponding rise in termperature, typically starting around 4:30pm, and running through the night until ~10am the next day. These data indicate strong inversion patterns which may develop over the entire South Side, most often during late summers and early fall.

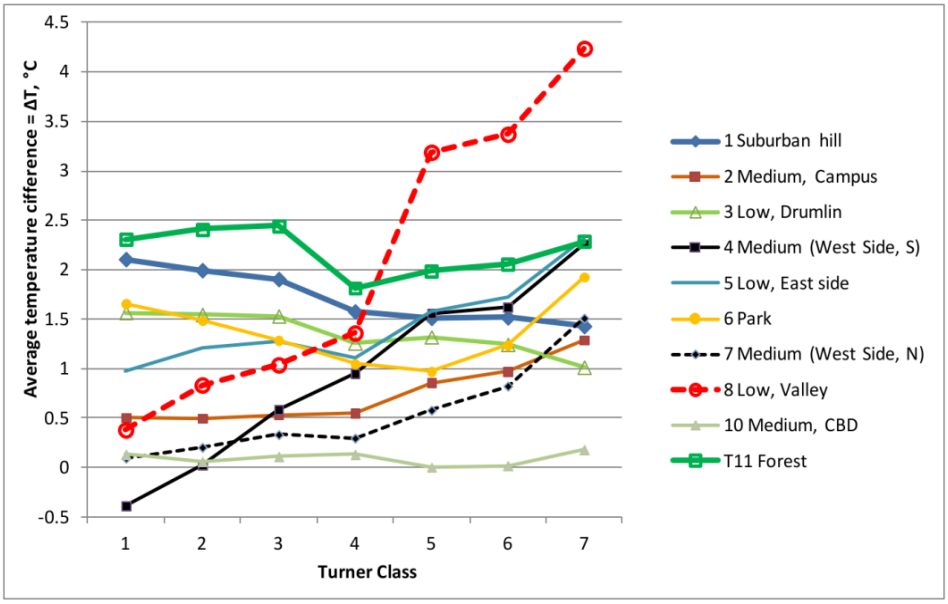


For contextualizing these observations, I compare them with particulate matter 2.5 measurements from a nearby valley.

I obtained pm2.5 particulate matter data from the US-EPA / NY-DEC's regional air monitoring station, located at 5895 Enterprise Parkway in East Syracuse. I accessed their 'PM2.5 - Local Conditions' data product, sampled every three days for 2010.

In ***Graph D)*** above, I compare these pm2.5 data here with a measure of the Upper Onondaga Park tower data for the entire year 2010. As the actual temperature data is messy, I simplified this data into the percentage of highest readings for each tower altitude monitor, among all three monitors. This may yield some indication whether atmospheric inversions are occurring at this site.

The comparison with pm2.5 data suggests some similar weather influences may bear on both locations. Also note the high peak for pm2.5 around Aug. 27th, at the start of Heisler et al's specific measured period above (Aug. 26 through Sept 3).



"Fig. 6 Average ΔT by Turner class for 10 of the sites relative to the city reference site. For developed land use classes according to NLCD, the legend includes development intensity. In general, difference in ΔT with Turner is more a function of topography than development, but overall average ΔT is a function of development intensity or impervious cover. "

Finally for contextualising this on the I-81 issues along the South Side, consider Heisler et al's Fig. 6, reproduced above (pg. The authors suggest **development intensity** as a function driving temperature change, possibly as much as topography in the Syracuse valley.

I note here the Railroad bridge collapse in downtown Syracuse in July, 2018. The cause for this collapse was likely in part from the aging, deteriorating concrete holding this bridge together. However, as City officials noted, at least in part this collapse was related with a heat wave that day (Lohmann 2018). As well, a patch of I-81 in Nedrow also happened to 'blow up' that day, also attributed to heat (Baker 2018). Given projections for climate change, it seems prudent to build our roads with as minimum heavy concrete as possible, so these infrastructure do not contribute to the 'Urban Heat Island' in Syracuse, and pose less maintenance and trouble in still warmer times.

Reference:

Heisler, G. M., Ellis, A., Trees, D., Nowak, D. J., Brazel, A. J., Na, H. R., Hall, M., & O'Neil-Dunne, J. (2012). *Summer air temperature differences in Syracuse, NY: Influences of land use and cover, atmospheric stability, and topography*.

News articles about heat concerns in Syracuse.

Baker, C. (2018, July 13). Extreme heat caused partial collapse of Syracuse railroad bridge, officials say. *Post-Standard, The (Syracuse, NY)*. https://www.syracuse.com/news/2018/07/record_heatwave_caused_partial_collapse_of_syracuse_railroad_bridge.html

Lohmann, P. (2018, July 5). Heat responsible for "blow-up" on I-81 this morning near Nedrow. *Post-Standard, The (Syracuse, NY)*. https://www.syracuse.com/traffic/2018/07/heat_responsible_for_blow-up_on_i-81_this_morning_near_nedrow.html

Environmental Monitoring (EM) at SUNY-ESF (2011) Upper Onondaga Park, Archive Data
URL = https://www.esf.edu/hss/em/onondaga/archive.html
File = UpperOnondaga_All.xls
"Meteorological data have been collected at the Upper Onondaga Park site since April 2007. These data include air temperature (6 ft, 110 ft and 140 ft), wind speed, wind direction, barometric pressure, relative humidity, precipitation and solar radiation. Data are collected at 15 minute intervals and available for download."

Comments on the NYS DOTs DEIS for the I-81 Project in Syracuse.

~Peter King, Apartment 3, 101 Hurlburt Road, Syracuse, 13224. Ph: 315-560-3019

What I am sending here.

I am sending my main comments here, plus two appendices: Appendix A) Lead hotspots on the South Side, and Appendix B) Atmospheric inversions in Syracuse. I am also sending an unpublished manuscript (Heisler et al, 2012).

I'm also posting my references online in a **bibliography,** created using a free reference manager, 'Zotero'. I posted a 'group library' on Zotero, 'Soils&lead-CNY', which is open to browse, or join if you use Zotero. » 'Soils&lead-CNY' Link = https://www.zotero.org/groups/2349953/soilslead-cny/library

About the* 'Soils&lead-CNY' *bibliography.

Soils&lead-CNY is organized by folder, and then into subtopics. If you have any question, feel free to call, text, or email me. When I refer to any study or resource below, I have also included it in 'Soils&lead-CNY'. If you can't find an item, simply select the very top library folder, and type your search term near the top of the screen. To see in which folder an item is located, select that item while also selecting the control button (most often 'ctrl').

***Accessing the linked documents from* 'Soils&lead-CNY'.**

For as many items as I could find, I either post a link to an openly available online resource, or a link on my google drive account. Under each item, click on 'Attachments', and then on one of the choices, usually marked with 'PDF-Link'. If anyone reading this find this activity frustrating, I can also simply post a zip file of all studies, arranged in matching folders.

My Comments on the I-81 Project through Syracuse.

Public Health.

Lead poisoning issues.

1) ***Social 'blind spots'*** are often confounding discussing soils as a lead contamination concern.

* Blind spots lock out other potential emerging views, data or solutions.

* As a society, most believe the most significant lead poisoning risks are peeling lead-containing paints, not Lead in soils. The same accepted views apply on lead-containing paint vs. gasoline as a source, and ingestion vs. inhalation as exposure mechanisms.

* In recent years, other ideas have emerged. In the 1960s, geochemist Carl Patterson wrote a series of studies which moved the then new US-EPA forward on removing lead from gasoline by 1986.

* Inspired by Patterson, a group of academics loosely organized around environmental chemist Dr. Howard Mielke started studying lead deposited in soils from leaded gasoline. Dr. Mielke also pushed the EPA on getting the lead out from gasoline, 10 years ahead of schedule.

* Mielke and his colleagues found, the 6 decades of leaded gasoline deposited more lead in soils than all the lead locked into paint (see graph below).

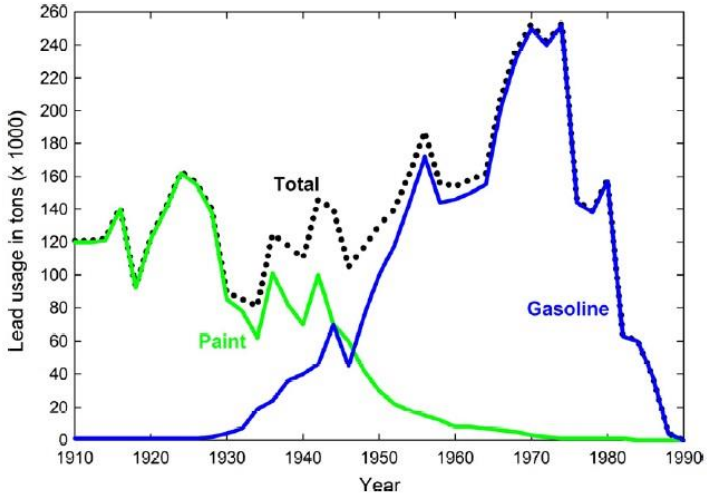


Fig. 1. History of Pb usage in paints and in gasoline during most of the 20th century, showing the early dominance of Pb-based paints followed by the boom in transportation resulting in a high use of leaded gasoline (after Mielke, 1999). The decline after the mid-1970s was due controls put into place to eliminate leaded gasoline.

* While the lead in soil is often more diffusely spread than the lead in paint, it is often more immediately bio-available as loose particles. This lead deposition became far more concentrated in urban areas, from vehicle use. Leaded gasoline emissions often travelled from roads onto rooftops, and then rained off along the building driplines. As it is often difficult identifying lead sources, people often assume all the dripline lead comes from the paint, where much may come from gasoline.

* I include under the 'Soils&lead-CNY' online Zotero bibliography ***'Mielke et al'***, all the studies I could find by this extended group of researchers. Their most difficult challenge seemed, the persisting paint story, despite the new, growing evidence. I include all these studies simply for showing how much they have studied this topic, and for the useful knowledge.

Syracuse lead soil studies.

* Dr. Mielke & his colleagues co-wrote a pivotal paper with Dr. Johnson of SUNY-ESF in Syracuse.

* Dr. Johnson and his students and colleagues had been studying lead and soils in Syracuse since 1995, when Johnson observed seasonality in children's blood lead levels in Syracuse (Johnson, McDade, & Griffith, 1996).

* By 2002 Johnson and Bretsch concluded, Syracuse lead-containing soils are highly correlated with children's blood lead levels in Syracuse. Dr. Johnson's next project was sampling the soils and household dusts in almost every area in Syracuse, for creating a database on metal distribution in Syracuse soils and dusts. Dr. Johnson's and his colleague's subsequent reports consistently vindicated his original 2002 finding, strongly correlating the lead in soils with children's blood lead levels.

* In 2005, Dr. Johnson collaborated with Dr. Mielke, Dr. Laidlaw and colleagues on investigating why children's blood levels seasonally rose during the summers (Laidlaw et al 2005). After proposing a potential connection with actual weather conditions, Laidlaw et al used regression analysis in testing four independent ecological climatic variables: soil moisture, wind, particulate-matter 10 (PM-10, or larger dust particles) and temperature. They found soil dryness the variable most correlated with higher blood lead levels, especially in Syracuse. They constructed a model for all 3 cities based on their regression analysis, which accurately predicted the actual children's BLLs for all cases.

* From this evidence, Laidlaw et al proposed several vectors seasonally exposing children to lead, as they might ingest and / or even inhale lead. These vectors may include lead-containing soil particles being re-suspended during warm, dry weather, and also possibly to lead-paint dust, as more people open doors and windows, shearing off paint.

* The authors also reviewed strong evidence suggesting leaded gasoline has increased lead content, especially among urban soils.

* Since Laidlaw et al 2005, Johnson and his colleagues obtained 3566 soil samples and sampled floor dust from over 400 Syracuse houses, producing several maps showing lead hotspots in Syracuse, in the soils and house dusts. Johnson et al produced a series of studies on lead and other metals in Syracuse, which I include in this bibliography. 2008, 2009 and 2011,

* Johnson et al produced their most complete leaded-soil maps in 2011, as cited below.

* Subsequent work by others indicates, the SUNY-ESF Chemistry Department still has Dr. Johnson's data.

* Dr. Johnson passed away in 2018. I spoke with him once in a while, and sometimes saw him and his wife bicycling the Westcott neighborhood. Dr. Johnson confided in me, he felt for Syracuse residents, and wished he could do more for them. Johnson was impressed on how much lead he'd found in Syracuse soils. For the interested, I include all work by Dr. Johnson and his colleagues under ***'CNY and Lead >> Johnson et al'.***

Mielke et al's 'recipe' for reducing kids BLL risk from soil.

Over many years of studies, Dr. Mielke and his colleagues have developed a 'recipe' for primary prevention against lead poisoning from urban soils.

1) Map the lead-containing soils in your city, for finding the lead 'hot-spots' from whatever source. Note = As noted above, Dr. Johnson and colleagues already created such a map for Syracuse, though it could be updated.

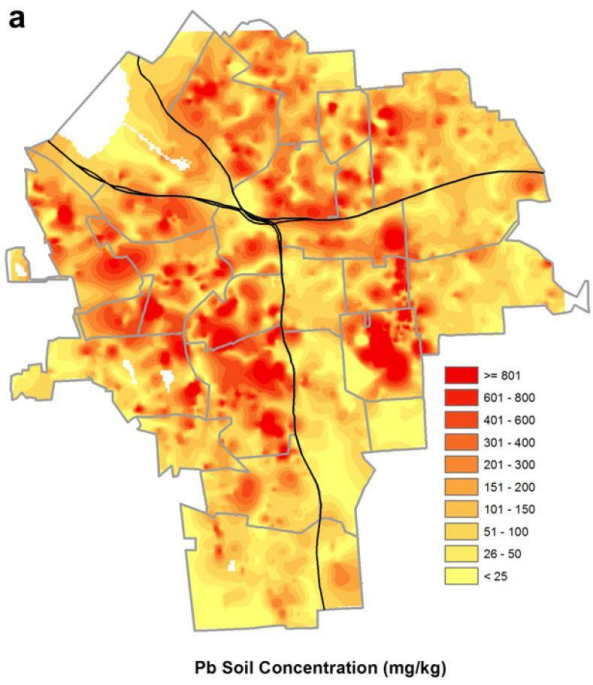
2) Create a local campaign for capping these hotspots, especially around children's playgrounds.

Mielke's specific recipe is, a) Capping the soil with a geotextile layer, and b) 'emplacing' a new clean soil on top (*Gailey, et al, 2020)*

Mielke et al argue, this is much cheaper than the most common alternative, 'digging and hauling' contaminated soils. Therefore, one can cover more ground with a limited budget.

* Note: I have no 'axe to grind' here. There seem other emerging methods in the literature, though costs may rise from there.

* The only other tip I may add here is, another recently quoted method involves bio- or phyto-remediation, which is using plants to extract lead by hyper-accumulating lead through their roots. However, bio-remediation works for more organic pollutants, but not so well for lead (Gailey et-al, 2020). However, as Dr. Johnson said in Post-Standard interview when he released his 2002 study, planting *anything* on leaded soil will help stabilize the material, and prevent soils from drying into dust (Perez, Dec. 2002) . Gailey et-al refer to this benefit as 'phyto-stabilization' (2020 again).



* Mielke and colleagues successfully carried out this recipe in New Orleans, LA, estimating the cost at $100 a child (Mielke et al, 2011). The country Norway converted Mielke's 'emplacement' recipe into a standard policy on their playgrounds.

Was some of the lead in Syracuse soils created by vehicles using leaded gasoline on I-81?

* In one early study on Syracuse soils, Dr. Johnson and Griffith examined the influence of leaded gasoline, but failed to find correlations with current poisoning (Griffith, et al 1998). Their study depreciated the impact from the major highways, assuming they "...are

elevated, run parallel to older urban streets, and presumably reduced previous gasoline lead pollution by distributing it through the air to a wider region."

* However, Joerger & Pryor analyzed general pollution from the I-81 viaduct, finding while the viaduct diffused particle pollution, particles also spread farther (2018). In this case, wind could explain the apparent lack of close correlation with leaded gasoline, if such a connection existed.

* I visually reviewed Dr. Johnson's most recent soil lead map, from Hunt et al (2011). Using Google Earth, I overlaid Fig. 2a showing lead-containing soil hot-spots in Syracuse, over a Syracuse map (see ***Appendix A*** on this comment, created from a map of lead-containing soils in Fig. 2a from Hunt et al, 2011). The associated Iron map in Fig. 2a also bears a similar footprint, suggesting to me air flow from the hillsides as a causal factor.

* The soil lead hot-spots on the near South Side seem related with Dr. Martin Luther King East, and Colvin and Brighton Streets. Do these lead plumes indicate an influence from regular wind currents blowing over I-81 downslope into the South Side, often in the evenings? I acknowledge, this lead could also be from other legacy sources, e.g. lead-containing paints and legacy industry.

* While we lack solid 'proofs' directly linking soil with leaded gasoline, there are other strong indicators regarding typical 'micro-climate' factors we find in Syracuse.

* Study and personal observation finds evidence of regular wind patterns up and down the hillsides adjacent with I-81, as a dominant micro-climatic forcing function during calm weather. Syracuse, like many USA cities, was built around water resources, and so grew outward from this bowl-shaped terrain. In an unpublished study of the central valley in Syracuse, the USDA Forestry Unit at SUNY-ESF documented night-time cold-air drainage as the dominant topographical forcing function in the Syracuse airshed, measurable by "a simple function of elevation within 2 km of each site" (Heisler et al, 2012).

* The authors investigated how atmospheric stability influences daily temperature changes in Syracuse's central valley and downtown, using 11 small weather stations. While a highly technical study, the concepts are clear. This study used elevation in calculating two indices, Cold Air Drainage Away (CDA) and Cold Air Drainage Toward (CDT). Under otherwise calm conditions, usually in the mornings winds will warm and rise upslope, and in the evenings, descend these same slopes. Such winds are often known in the literature as 'anabatic' for upslope and 'katabatic' for downslope winds. Like most wind, predictable temperature and pressure differences between neighboring air masses move 'anabatic' and 'katabatic' winds, creating local neighborhood micro-climate conditions. Figure 9 on pg.19 maps where katabatic winds push higher-pressure nightime cold air down onto the central valley floor, an area with high 'Cold-air Drainage Toward' (CDT). Heisler et al observe much of the South Side is an area of high CDT, meaning cold air will naturally pool here, likely in the evenings.

>> Please also note my Appendix B to this comment, with more about this study.

* If this study accurately describes regular air movements, then the lead soil hot-spots David Johnson documented, may indicate where air regularly blew lead pollution emissions from evening rush-hour traffic along I-81, concentrating in plumes into the South Side.

* Testing these air currents would not be expensive. For example, a high school class could use smoke generators like incence on certain streets, documenting the results.

The Federal Government should have no problems in knowing about lead in soil and dust, through Mielke et al, or Dr. Johnson et al.

* The Federal Government has for years recognized the above studies as scientifically valid. However acting on this data requires a shift in thinking from the typically reactive secondary care to primary care aka preventative medicine. Note, secondary care is far more 'expensive' for everyone, not the least those who must suffer from these conditions.

* Possibly since Flint MI, it seems the Fed gov't and possibly local agencies have taken notice, and many are attempting transitioning from secondary to primary care.

* By 2021, the Federal ATSDR concedes in their 'Toxicological Profile for Lead', most toxic lead exposure as documented, comes from soils and dust. The ATSDR refrains from citing inhaling re-suspended lead as a proven risk, but fully recognize this potential, and also the seasonality in children's BLLs, and the likelihood leaded gasoline has contributed to soil contamination. These are noted in the ATSDR lead 'Toxicological Profile's 1st Chapter, second page, citing Johnson & Bretsch 2002, Laidlaw & Filippelli 2008, Laidlaw, et al 2012, and Laidlaw, et al 2005 (Pg. 16 in the ATSDR pdf). Three of these studies specifically discuss Syracuse data, while the 2012 study builds on Mielke et al's findings in Syracuse and two other cities in 'Seasonality' (2005).

The 'good news' on lead in blood and soils, = Declines, but we should not drop all concern re: I-81

- In recent years, the lead in Blood lead levels and soils seems declining everywhere. Dr. Mark Laidlaw who works with Mielke, offers a possible explanation.

"UNTESTED Hypothesis for the declines in blood lead levels Following the elimination of lead in gasoline. I have questioned whether the decline if in blood levels following the elimination of lead in gasoline has resulted because in urban areas highly contaminated soils have been resuspended year after year. What could be happening is that a sizable percentage of the resuspended soil and lead falls on impervious surfaces such as roofs and roadways. This material could have then been brought out of the system depositing into sediments in rivers and estuaries. This could conceivably be reducing the lead concentrations in urban soils and subsequent exposures in the atmosphere through resuspension. The "signal" should be present in the sediments of estuaries. (indeed it is in Sydney, Australia - see Birch - University of Sydney). This is only a hypothesis at present."

(From: Dr. Mark Laidlaw's blog, as archived under) =

https://web.archive.org/web/20201112025414/http://urbanleadpoisoning.com/

- However, given the high amounts of lead found in Syracuse, and the silt base under the city, calling lead a 'solved problem' is inaccurate.
- Construction during and after I-81 needs some care and consideration. DOT has emphasized some careful procedures for reducing contractor risks from contaminated soil, and DEC will be monitoring the site air emissions (DEIS Chapter 4, pp.52-53, Table 4-7: Measures to Minimize Community Impacts,).
    - I urge DOT make this language more 'front and center', not buried so deeply in a table.
    - I urge DOT collaborate with the City, in reducing how local construction so often tends to spread dust everywhere. These are quite likely toxic materials.

One thorough dust toxins management policy model I recommend: NYC's Department of Environmental Protection (NYCDEP) manages a sub-policy under NYC's "Air Pollution & Regulations" Air Pollution & Regulations » Building & Construction Emissions » Construction Dust and Debris » Construction Dust Rules
< https://www1.nyc.gov/site/dep/environment/building-construction-emissions.page>

> "DEP advertises best management practices to control the emission of dust from construction related activities. Section 24-146(c) of the New York City Administrative Code states, in summary, that no person shall cause or permit a building or road to be constructed without taking such cautions as may be ordered by the commissioner to prevent particulate matter from becoming airborne."

Inversions and calm weather.

* Especially under calm conditions, urban valleys often develop atmospheric inversions, where air temperatures rise with altitude, often forming a stable air mass which can trap or 'bottleneck' pollution.

* A NYS-DEC study conducted soon after I-81 was built, estimated inversions occur in Syracuse 20 to 35% of the time peaking in the summer and fall. DEC considered a 25% to 31% inversion rate "a significant contribution to adverse conditions over the year" (pp. 20-21 of 101 in the pdf, aka "18-19", NYS-DEC 1970).

* The DEC study also found, "Transportation sources accounted for 91% of the carbon monoxide and 70% of the hydrocarbon emissions; in quantity more than all of the other pollutants combined" (pg.9/101, aka "7").

* The DEC found local Construction a critical sector contributing pollution, as it "may have significantly influenced high samples for suspended particulates, settleable particulates, and soiling indexes (pg.8/101, aka "6")."

* "Because of large amounts of dust generated from construction activity, [the DEC] recommended that: The Air Pollution Control Board investigate different methods for the control of dust from construction activity, especially demolition."

>> ***Please also note my Appendix B to this comment, with more about atmospheric inversions.***

Syracuse air quality history, and its significance in understanding Syracuse's climate and weather.

* I offer the above evidence, even though this study was conducted when air quality analyses were in their infancy compared with the available methods today. The NYS-DEC study indicates how Syracuse has consistently seen periods of low or stagnant wind conditions throughout the year, but most often during summers.

Community opinion and involvement in air pollution concerns.

* In reviewing Syracuse newspaper articles all century, I found the community dialog about air pollution was often well-informed, often demanding action from the City government.

* I found the City of Syracuse addressed air pollution as early as 1907, following a Chamber of Commerce white paper calling for immediate action for reducing coal smoke (Syracuse Chamber of Commerce, 1907). This pamphlet became widely quoted in its day, for example by the famed Central Park landscape architect Frederick Olmsted, in a pamphlet about reducing urban coal smoke pollution (Olmsted, Kelsey & American Civic Assoc.,1908). The City Common Council passed a 'Smoke Abatement Ordinance' soon after the Chamber's report, establishing regulations on coal burning equipment with penalties.

* Over the 20th century, up to the 1960 City Charter, the 'Smoke Abatement Ordinance' passed through many changes, but was maintained. Syracuse 'smoke abatement' officers were founding members of the national Air Pollution Control Association, and continued this membership until the 1960s.

* Throughout the 20th century, the community dialog on air pollution seems frequent and often well-informed, showing high interest, and calling for policy solutions. For its part, the City has responded in pro-growth ways, but at least answering the community's keen interest (XXX 1948).

* Air pollution concerns received much community attention, even as the switch to natural gas for heating and increasing motor vehicle use by 1960 made monitoring air pollution much more a technical challenge. The 'smoke' was no longer as visible, and so tougher to regulate by available means.

* The question of funding air pollution monitoring became a hot issue during the 1964 Mayoral campaign in Syracuse.

* During the 1960s, many Syracusans expressed concern about atmospheric inversions, in articles and letters to the editor. The 1970 DEC study was definately asked for, and anticipated by Syracuse residents and policymakers.

* By the 1970s, the understanding seemed, the Federal government was going to solve pollution concerns by policy. Now regional 'air pollution count' for each new day, could be read on the Syracuse Post-Standard's front page, in the lower left corner by the weather.

* I recount this history for understanding, air quality is not a 'new' issue in Syracuse. The consistency of interest in this issue here indicates, the fact we have cleaner-burning fuels today may not 'solve' air quality problems for all of Syracuse.

Asthma and other respiratory, and cardio concerns (Working on this section).

* Recent national trends in asthma.

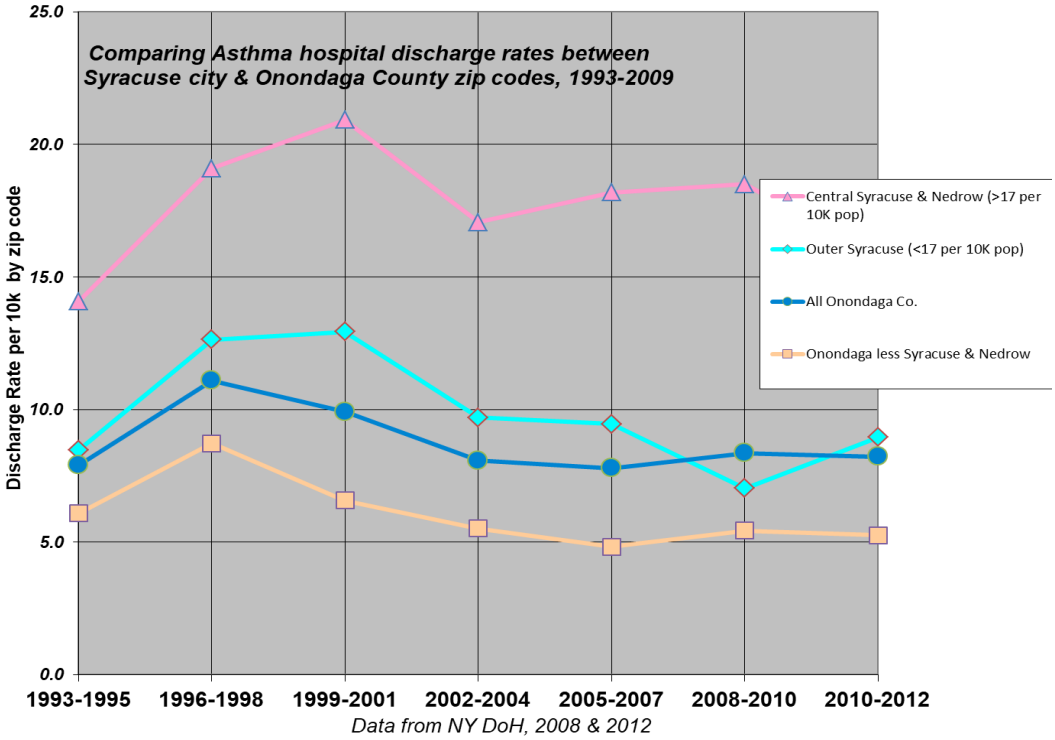
* "Despite some improvements in asthma outcomes over time, the findings from this report indicate that disparities in asthma indicators persist by demographic characteristics, poverty level, and geographic location." From: Asthma Surveillance — United States, 2006–2018 Surveillance Summaries / September 17, 2021 / 70(5);1–32

https://www.cdc.gov/mmwr/volumes/70/ss/ss7005a1.htm?s_cid=ss7005a1_w

**** Contextualizing current and historic asthma in Syracuse.***

* Insert Graph = I have a graph from 1993 through 2012, but in recent years, obtaining more recent data from NYS Dept. of Health seems difficult. The evidence shows, asthma is not substantially reducing in Syracuse. Much of this asthma is occurring around or near the interstates.

* No one has yet conducted an attributional study on the asthma, nor a health impact assessment on the I-81 project.



* In the 1990s, community members Sydney Oglesby and Carmen Harlow led Pioneer Homes residents in protesting SU buses idling on game days by Pioneer Homes. This brought asthma concerns to broader light, and eventually SU ceased this practice.

* During the summer of 1999, I-81 was shut down for repairs, for 3 months. The EPA / DEC Carbon Monoxide monitor under I-81 recorded a drop in CO readings, which rose again after traffic resumed. (I have previously submitted this in a comment to NYS-DOT.) To me this indicates, a) we should remove the viaduct along the entire stretch of I-81, from Brighton through downtown, and b) the less intensive roads through this central area, the cleaner the air quality.
* Carbon Monoxide was decreasing by Federal regulation during this time, so the CO Monitor under the I-81 bridge by Pioneer Homes was removed in 199x. However, CO and lead are the two criteria air pollutants *most* reduced by EPA motor vehicle regulations. Ozone and particulates continue to be hazards (See my 2014 comment for documentation).
* The solutions proposed for I-81 along the South Side contra air pollution, could help reduce asthma, other respiratory, and cardio-pulmonary concerns here.

Health aspects of bicycle and pedestrian accessibility

* 'Safety in Numbers' theory finds evidence how, the more people walk and bicycle in a given area, the safer those activities become (Jacobsen, 2003). 'Safety in Numbers' seems supported by ample data worldwide (ibid). The more DOT can build on their already great design ideas for downtown, the more we have safer, healthier walking and bicycling places accessible for anyone here.
* Walking / hiking / bicycling 'greenways' have much potential in Syracuse.

* Syracuse as historically through currently sharing a strong interest in walking, hiking, jogging, running, wheeling, scootering, bicycling, etc. There is much evidence for these ongoing interests here, for example the year round races and bicycle activities, In May 1998, FOCUS Greater Syracuse held its first 'Visioning Fair', inviting around 4k attendees. The visioning goal clearly receiving the most votes was, "Build bicycle paths, hiking trails and walkers' paths throughout the county." (Moriarty, May 6, 1998).

* The City's 1st bicycle planner in about a century was Paul Mercurio, who likely had a large impact on increasing safety among pedestrians and cyclists from his tenure, ~2008-2014 or so. For example, data indicates during this time period, both bicycle and pedestrian safety significantly improved (See the official state traffic safety data).

* One benefit which may not be widely known, is in potentially creating corridors for fresh, cool air to move more through neighborhoods. DOTs Creekwalk re-design under I-690 maybe an example of desirable design for moving fresh, cooler air.

* Now if we can introduce similar smart designs along the South Side, the potential for reducing air pollution there may improve. For example, bringing down I-81 from a defacto viaduct along the South Side, to becoming a regular city street, may improve the prospects for more frequently cool breezes blowing down the slopes here. See my wrap-up below, for more about this idea.

Overture and policy comments.

* The original error was placing I-81 immediately adjacent with a residential neighborhood, despite the growing public knowledge about air pollution by the early 1960s, for example the negative health influence from inversions in nearby rust-belt cities like Pittsburgh, PA. A Syracuse-Onondaga Post-war planning council warned against placing highways too near residential neighborhoods (Syracuse-Onondaga post-war planning council, 1945). \

* The history and topography in Syracuse indicate, this is an area especially prone to valley-scale atmospheric inversions, much like many bowl-shaped cities. These inversions often occur along steep sloped areas, like where I-81 runs along the South Side. The NYS DOTs complete lack of actual air quality data in their DEIS, indicates their position as not considering air quality an issue here. The asthma, COPD and Cardio condition rates speak otherwise, though to date no one has conducted a proper attributional study on these, nor a health impact assessment on the I-81 project.

* Currently, warm, dry weather in the late summer and early fall denotes a higher risk of breathing resuspended lead dust aerosols, if we accept Mielke et al and Johnson et al's findings in many cities including Syracuse.

* With climate change, we are now and will likely continue seeing increases in warm, dry, stagnant weather in the coming years.

**** From this information we might generally recommend actions.***

1) Cap or remediate the lead soil 'hot-spots' typically downwind from I-81, especially children's playgrounds.

2) Form an urban climate plan adapting these city neighborhoods to night-time cold-air drainage. The latter could be connected with the City's existing Urban Forestry Master Plan, which has reducing Urban Heat Island as a specific goal.

* I have personally asked Syracuse forester Steve Harris if he would consider taking part in a 'Clean Soil Bank' as New York City has pioneered in recent years. Steve answered, that sounds like a great idea. A Clean Soil Bank could make remediating or capping lead-poisoned areas much easier, as it would provide readily available soils as a clean top cover layer. There are several ways for making or saving clean soil *(see bibliography under Soil-Lead-Remediation)*.

3) Create more sidewalks and greenways for walking, bicycling and etc., which could also help promote cooler breezes through the neighborhoods.

4) All the above actions, would best be coordinated through the post-I-81 joint land planning group as specified in the 2021 DEIS, operated by a collaboration including city residents and the City government.

5) A joint land planning group could and should address any and all gentrification issues which can likely arise from making improvements in your neighborhoods. There are multiple ways for addressing gentrification concerns, the first I would recommend is, requiring equity in representation among local neighborhoods, on the joint land planning board.

6) Specific to the South Side, I urge the DOT model and consider removing the I-81 Viaduct from just south of the Brighton Exit, into the city.

* The existing ramps just south from Brighton here, show the angle is not too steep, and doable.

* The immediate area is the first area adjacent with I-81 from downtown, without houses and children very nearby.

The more we perforate this stretch by connecting with existing side streets like Colvin, Brighton and so on, the less people would concentrate on BL81 alone, and follow other routes. This option could truly re-link these neighborhoods.

* A ‘Brighton Gateway’ would greatly reduce the infrastructure burden here, including maintenance costs and the threat posed by crumbling concrete, as we saw in 2018 with the railroad bridge collapse downtown (Baker, 2018, Lohmann 2018).

* What about Air Quality? Bringing the road down sooner could reduce negative air quality along this stretch. For starters, the less we expose pavement in sunlight, then less heat re-radiates on hot days. With even a bit of 'depressed highway' here, the pathway for breezes regularly running up and down the (east-west) slope here could encounter fewer obstacles, giving the area better natural air conditioning and pollutant removal by flowing from the much-vegetated hillsides immediately to the east. Quoting an unpublished study by USDA Forestry at SUNY-ESF, "The most important topographic influence [on the South Side] was night-time cold air drainage, which we found to be related to a simple function of elevation within 2 km of each site.” (Heisler et al, 2012)

At least exploring this approach is supported by data. Please review my information on planning and my analysis in Appendix B. with respect to these breezes, for cooling the city and reducing lead poisoning.

Why not a 'Brighton Gateway'? Project Director Mark Frechette has opined, the problem with coming to grade further south than Kennedy is, then drivers going downtown will speed up again. I respond to this concern here, isn't that why we have speed limits on City streets?

I refer to 'Safety in Numbers' theory here (see 'Active non-vehicle Transport' section above), and I call for sounder urban planning, which Syracuse has so often, even historically been short on.

Advanced Policy action proposal *(Basically a version (2) above, restated with a current example)*

* This 2021, the City of Santa Ana, CA is formulating one policy combining their climate action plan with a lead poisoning prevention plan. Studies in Santa Ana indicate how the old roads in town map closely with the current lead hotspots, indicating contributions from leaded gasoline. This matches the evidence from several studies by Dr. Mielke and his colleagues (Cabrera, 2021, https://grist.org/equity/santa-ana-california-climate-emergency-lead-remediation/)

* ***Syracuse could also pioneer in combining climate with lead poisoning as an action plan.*** This would require some agencies coordinating, Federal funding and advice, and above all including neighborhood residents in all phases planning.

* This approach would take collaboration between NYS and Federal DOT, and the City, possibly even the County.

* The costs could be quite reasonable, for example $100 a child. please review studies by Mielke et al.

Thank you, Peter King
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- Note: I am forwarding this paper with my comments.

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Link = https://www.zotero.org/groups/2349953/soilslead-cny/library

Summer air temperature differences in Syracuse, NY: Influences of land use and cover, atmospheric stability, and topography

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Summer air temperature differences in Syracuse, NY: Influences of land cover, atmospheric stability, and topography

Abstract Though the influences of urban structure on air temperature have been studied in many cities, the potentially dramatic and time-varying influences of topography on air temperature have often been omitted or studies have been done where elevation contrasts were unimportant. Hourly averages of air temperatures at 1.5 m above ground were measured from July 15, 2010 through September 15 2010 at 11 locations in Syracuse, NY. The temperature, T_{ref}, of a site near the central business district (CBD) was used as the reference for comparison with temperatures, T_{site}, at other sites as $\Delta T = T_{ref} - T_{site}$. Thus a positive ΔT indicates T_{site} is cooler than the reference. On average, the reference had the highest temperature. A site within an 18-ha forest within the city limits had the highest average ΔT, 2.08 °C. At mid-day, when the forest had a ΔT of about 2 °C, it averaged about 0.5 °C cooler than any other site. Though the average site ΔT's over the summer were related to land use, the daily temporal pattern of hourly ΔT values was more related to indices of atmospheric thermal stability and topography. To index f atmospheric thermal stability, we used Turner Class derived with cloud cover, cloud height, and wind speed at the city airport. The most important topographic influence was night-time cold air drainage, which we found to be related to a simple function of elevation within 2 km of each site. Elevations in the 66-km^2 city differ by 326 m and landform has steep-sided hills and valleys. The greatest 1-h ΔT, 6.6 °C, occurred in a valley section of the city during thermally stable atmospheric conditions that occur only at night. An addition of 10 % of land area added to tree canopy cover would reduce average air temperature by about 0.4 °C.

Key words: cold-air drainage, impervious cover, thermal stability, urban climate, urban tree canopy

Introduction

Air temperatures in cities have significant effects on the city environment and its residents. Local air temperatures affect air quality, energy use, human thermal comfort, plant growth, and ultimately human health and well-being in cities. Numerous factors affect near surface air temperatures, including land cover, topography, and ambient meteorological conditions that control wind, the radiation energy budget, and atmospheric thermal stability (Heisler and Brazel 2010; Brazel et al. 2005; Brazel et al. 2007; Oke 1987). These factors usually have larger influences on air temperature than anthropogenic heat emissions, which are nevertheless also significant (Allen et al. 2011; Sailor 2011).

The purpose of this paper is to explore how land cover, topography, and atmospheric stability affect variations in air temperature across the City of Syracuse, NY. Specifically included in the land cover analysis are two dominant cover types: tree cover and impervious cover.

Trees can provide numerous ecosystem services,. for example, increasing air quality (Nowak et al. 2006; Nowak et al. 2000; Taha 1996), reducing energy use for building space conditioning (Heisler 1986; Simpson 2002), affecting human health and comfort (Hartz et al. 2006), and modifying sequestration of carbon (Nowak and Heisler 2010) . All of these influences may be affected by air temperatures, which in turn are affected by tree cover. Thus appropriate modifications to the urban forest by tree management have the potential for increasing urban forest benefits through tree influences on air temperature.

To explore how land cover, topography, and atmospheric stability interact to affect air temperatures during the summer, 11 small weather stations were dispersed throughout the city between July 15 and September 15, 2010. The locations of the weather stations included inner-city low-lying-plain locations with varying building and tree-canopy cover; a residential site in a flat valley; and residential, institutional, forest, and park sites in upland areas. The measurements represented air temperature differences (ΔT) in the lower levels of the urban canopy layer. The urban canopy layer is

considered to be the space generally below the average height of trees or buildings, whichever are taller. The values of ΔT were hourly differences in temperature between 10 of the sites and a reference site near the central business district (CBD). The analysis for air temperature in this study contrasts with many other studies that have analyzed urban surface skin temperature that is measured by remote sensing from satellite or aircraft (Voogt and Oke 2003).

In addition to ΔT, our data for analysis included indices of atmospheric thermal stability and of topographic configurations. The configurations of interest were those that would induce cold air drainage under thermally stable conditions that occur on clear calm nights. The thermal stability index was derived from wind speed and cloud cover at the Syracuse airport weather station. Many studies of urban influences on temperature have considered only certain stability conditions, such as only at night or only at the peak of daytime temperatures.

We characterized topography by GIS analysis of on-site elevation relative to the highest and lowest elevations within 2 km of each site using exceptionally high-resolution digital elevation data derived by a recent LiDAR acquisition. The unique glacially molded topography of Syracuse with flat valley bottoms, steep-sided slopes, and many drumlins makes the city an excellent location for study of the influence of cold-air drainage.

Future statistical analysis will include regression modeling of the influence on ΔT at a range of distances from the temperature-measurement points. Such models will enable mapping of the spatial patterns of temperature across the city. The goal in the current study was to develop understanding of the primary influences on air temperature in the city to put the future statistical analysis on a more solid physical basis. Similar approaches were used in Baltimore, Maryland (Heisler et al. 2007; Ellis 2009; Heisler et al. In review).

Methods

City geographical setting

This study was carried out in the City of Syracuse, New York (Latitude: 43.0481°, Longitude: -76.1474°). In 2010, Syracuse had a population of about 145,000, but it is centered in Onondaga county with a population of about 467,000 (U.S. Census Bureau 2010). In recent decades, the city population has declined as people have moved to surrounding suburban areas (Hyde 2011).

The City spans the intersection of two physiographic regions, the Eastern Lake section of the Central Lowlands to the north and the higher elevation Appalachian Plateau Province to the south. The Central Lowlands extend from Syracuse to Lake Ontario, approximately 50 kilometers north. Geology both north and south has been strongly influenced by glacial scouring and meltwater erosion and deposition, resulting in topographic features that are well-illustrated in Fig. 1. The city and nearby areas contain many drumlins, egg-shaped hills up to about 1 km in length, which are clearly visible in the figure. Drumlins were formed by deposition below the continental glacier. These hills are of sufficient size to influence micro-scale[1] climate features such as down-slope cold-air drainage. Syracuse is at the north end of the Tully Valley, an approximately 10-km-long by 2-km-wide pre-glacial river valley that was deepened and widened by continental-glacier carving (Yager et al. 2007) and then partly filled by outwash material that forms the rather flat floor of the steep-sided valley today. The Tully Valley outwash that makes up the valley floor lies over a scoured bedrock trough that extends north to the northwest end of naturally formed Onondaga Lake (Fig. 1). As we shall demonstrate, the valley, which drains gradually to the north in Syracuse, plays a major role in spatial patterns of Syracuse air

[1] Oke (1987) summarizes the concept of overlapping horizontal scales in climatology as: micro-scale, up to 1 km; local scale, 100 m to 5 km; meso-scale, 10 to 200 km; and macro-scale, more than 100 km.

temperature. Intensity of development is generally greatest on low lying land with low percent slope (Fig. 2).

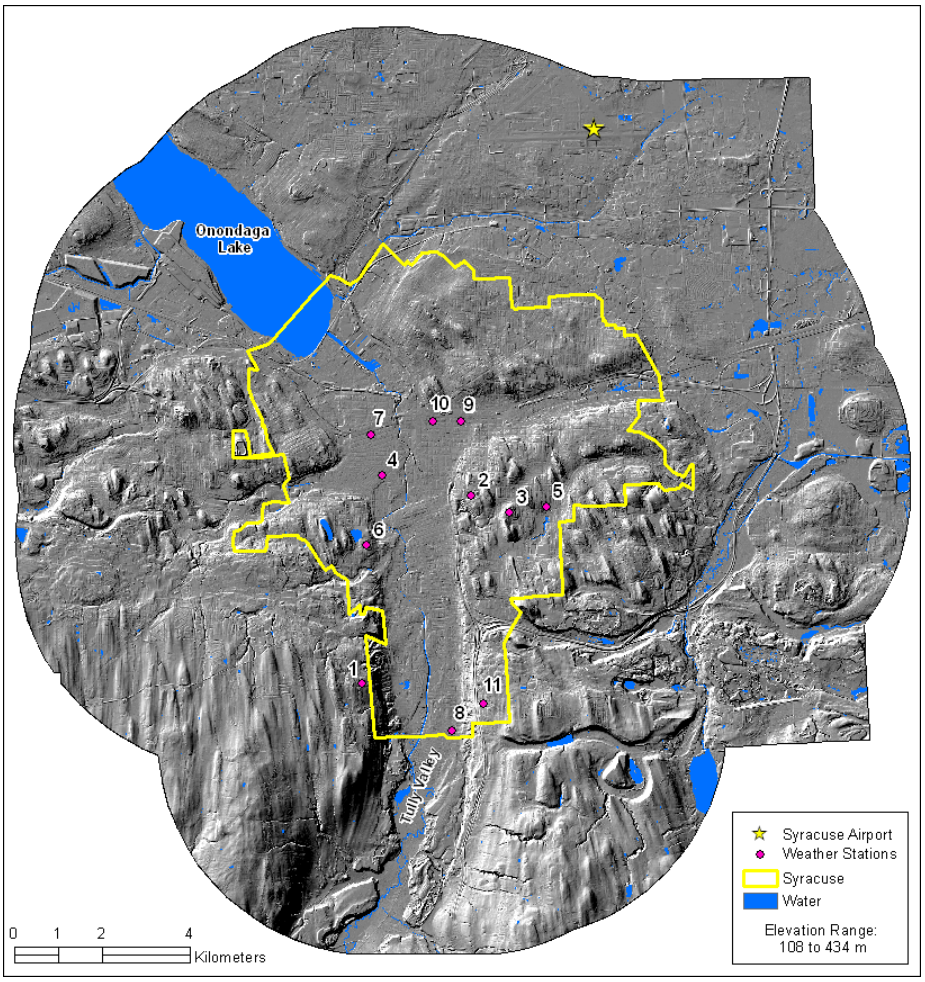

Fig. 1 Topography of Syracuse and vicinity. Elevation is from a digital elevation model derived from high-resolution LiDAR acquired in 2010.

Measurement Sites

The 11 weather-station locations (see Figs. 1 to 3) were selected to sample the wide range of variability in topography (Fig. 1), land use (Fig. 2), and tree-cover (Fig. 3) in the city. In addition, consideration was given to the fact that this study was part of the larger ULTRA-EX program for Syracuse (http://www.esf.edu/cue/ULTRA/default.htm), which focused on three neighborhoods in the western portion of the city designated Downtown, Near West Side, and Strathmore (Figure 1 in Baptiste et al. 2012). Site 9 is just east of the Downtown neighborhood; site 10 is within Downtown; sites 4 and 7 are in the Near West Side; and site 6 is in the Strathmore neighborhood.

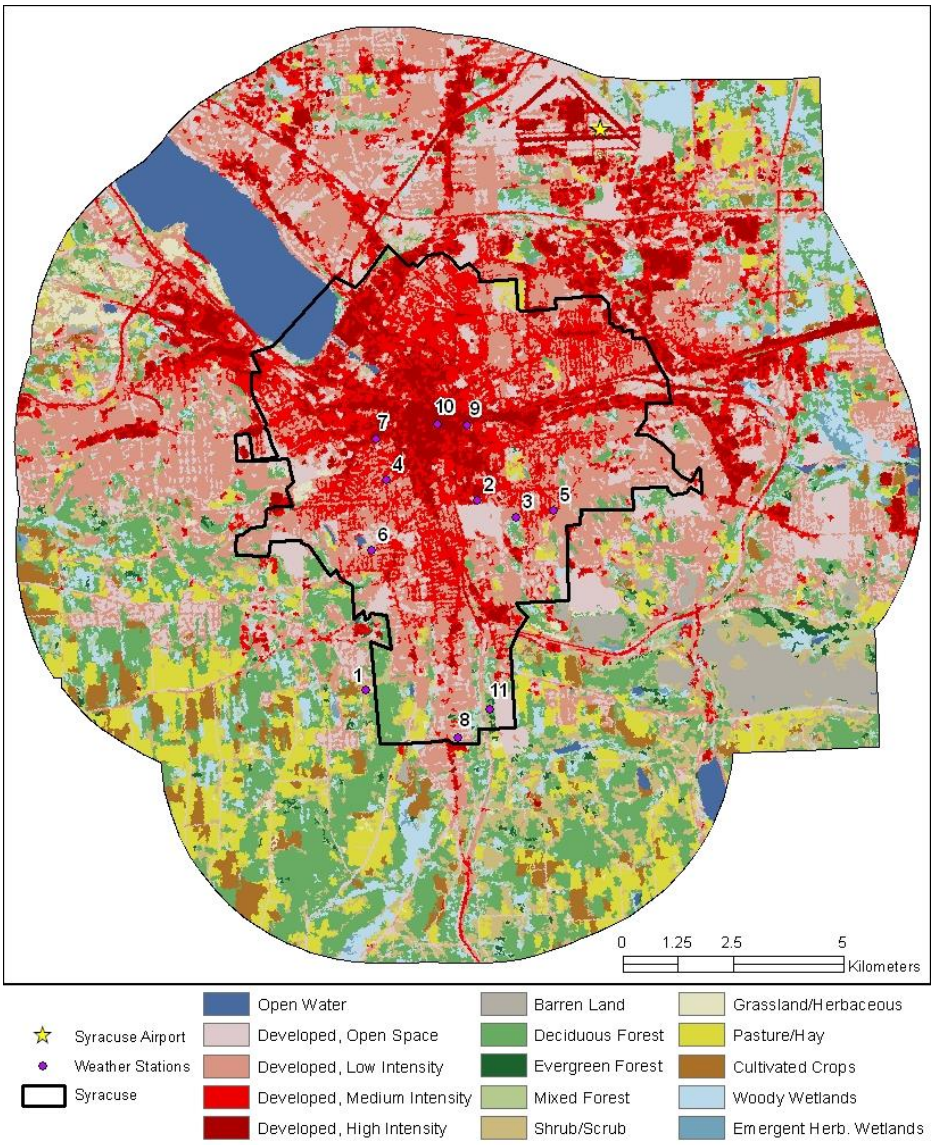

Fig. 2 Land use (National Land Cover Database, 2006) in Syracuse and vicinity.

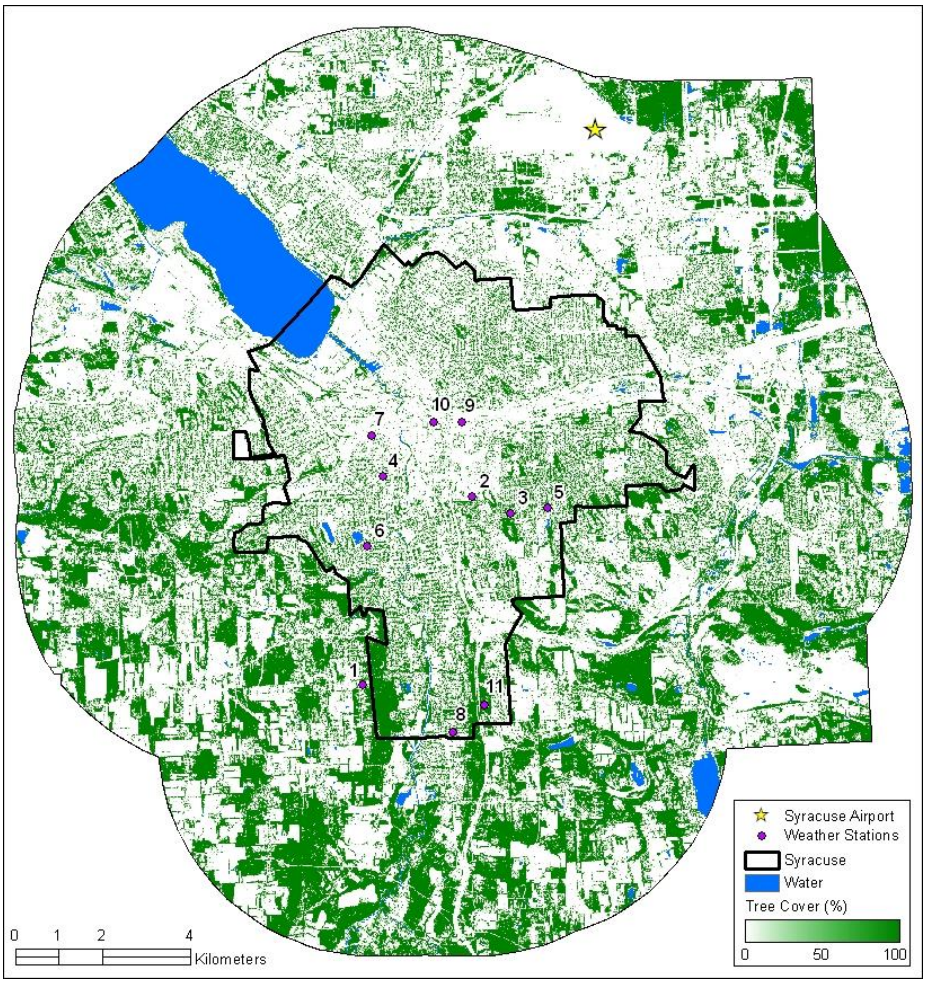

Fig. 3 Tree canopy in Syracuse and vicinity extracted from the 2010 LiDAR data.

The total area shown in Figs. 1 to 3 is the area of LiDAR coverage from an April 2010 acquisition (Nowak et al. 2012). It includes the City of Syracuse and a buffer at least 5 km wide around the city. The buffer was included so that modeling of temperature differences across the entire city may be carried out without edge effects. Land cover at least up to 5 km from a point may affect below-canopy air temperature (Heisler et al. 2007).

The weather station sites are classified by topography and land use according to the National Land Cover Database (NLCD, http://www.mrlc.gov/nlcd2006.php, (Fry et al. 2011) in Table 1. They are: in a suburban residential area on a hill above the Tully Valley, with a classification of grassland (Site 1); an upland institutional location on a college campus (Site 2) classified as medium density development; two upland locations in low-density residential developments (Sites 3 and 5); near a large office building in the high intensity developed CBD (Site 10); in a commercial area near the CBD (9); two sites (4 and 7) in flat topography with medium-density residential development; an upland park (6); in a low-density residential area on the valley floor (8); and a forest location about 300 m up the side of Tully Valley (11). The NLCD classification of "shrub/scrub" for the park, site 6, and the forest, site 11, would more accurately be "low intensity developed" for site 6 and "mixed forest" for site 11.

The influences of urban trees include micro-scale influences on air temperature. The intent of the study was to sample a full range of spatial scales, and some of the weather stations were located close to obstacles, unlike the suggestions of Oke (2006) for locating urban weather stations as far from obstacles

as possible, in order to limit micro-scale influences. Sites 2 and 6 are within 4 m of buildings; and only the forest site is more than 30 m from a building. All sites except for site 9 were 4 m or less from tree crowns. Ground cover at most sites was short grass. The park site, 8, was on bare soil, and mixed conifer and broadleaf tree liter was the forest floor at site 11. Pielke et al. (2007) discuss poor siting of weather stations that are part of the USHCN (United States Historical Climate Network). Stations in the USHCN are intended to be in locations and installed so as to represent air temperatures over large areas--local scale or larger. Our objective was to include smaller scale variation.

Because Site 9 has minimal micro-site features, it was chosen as the reference location for forming temperature differences, ΔT, as $T_9 - T_{site}$, where T_{site} is the temperature of each of the 10 other sites, and T_9 is the temperature of the reference. Here we follow the usual practice in urban meteorology, in which temperature differences are given as temperature of the more urban site minus temperature of the more rural. Site 9 is on a sizeable lawn, about 15 m from the nearest live tree crown, 8 m from the nearest impervious surface, and 30 m from the nearest building, Site 9 is also just 70 m from the base of one of two tall towers on which flux measurements of CO_2, sensible heat, and latent heat are being measured in other research (Buckley et al. 2010), parts of which are included in the ULTRA-EX study (Buckley et al. 2012).

An important part of the analysis was stratification of ΔT according to Turner Class , which is an index of atmospheric stability, (Turner 1961; Panofsky and Dutton 1984). Figs. 1 to 3 include the location of the Syracuse Airport, which is the site of an Automated Surface Observing System (ASOS) station that provided cloud and wind data that we used to calculate Turner Class.

Table 1. Land use at the weather station sites as shown on the NLCD 30-m land use map in Fig. 2.

Site		NLCD land use
1	Suburban hill	Grassland
2	Campus	Medium intensity developed
3	Drumlin	Low intensity developed
4	West side, S	Medium intensity developed
5	East side	Low intensity developed
6	Park	Shrub/scrub
7	West side, N	Medium intensity developed
8	Valley	Low intensity developed
9	Reference	Medium intensity developed
10	CBD	Medium intensity developed
11	Forest	Shrub/Scrub

Instrumentation

An important consideration in reporting observational urban climate data is specification of instrumentation (Stewart 2011). We measured air temperature, relative humidity, wind speed, wind direction, precipitation, and total solar radiation at the 11 sites with Davis Instruments (Haywood, CA) "Vantage Pro2 Plus" weather stations combined with Davis "WeatherLink" data loggers in radio-connected "Weather Envoy" receivers. This sensor system has a 0.75-watt solar panel to power a small fan that aspirates a radiation shield containing the temperature and humidity sensors. Especially considering the number of variables measured, these systems are low in cost, being more for the weather hobby market than for research use. Thus, accuracy and resolution of the measurements is a concern. The low cost is an advantage for use in urban areas where vandalism may be a problem.

The measurement electronics and radio of the system operate on a separate 0.5-watt solar panel, and the data logger uses three AA batteries, so that neither AC current nor large batteries are required. Our experience is that durability is sufficient so that the instruments will operate for more than a year without requiring hardware maintenance beyond replacing the AA batteries a few times.

We mounted the Davis stations on locally acquired 1.5-m masts held by inexpensive, folding, 1-m tall tripods for TV antennas (Radio Shack, Inc.). The tripods were held in place with six 0.25-m spikes driven into the soil. The intake for the temperature measurements was at a height of 1.5 m, and the anemometer and wind vane were at about 2 m. Measurements of temperature occurred every 3 s and averages for every 15 min were recorded.

With most electronic temperature measurement systems today, the error in measuring outdoor air temperatures is caused primarily by solar and thermal radiation fluxes in the environment rather than by inherent inaccuracy of the sensor itself. The manufacturer's specifications for the Davis "VantagePro2 Plus" claim that the solar radiation induced error is 0.3 °C or less. We tested the systems briefly by comparison with a system consisting of a precision custom-made, platinum-resistance temperature sensor in a power-aspirated radiation shield from Radiation and Energy Balance Systems (Seattle, WA). Our tests indicated that under strong solar radiation, the Vantage Pro 2 Plus temperature system error is as the specifications say, less than +0.3 °C, which is small by comparison with temperature sensors in non-aspirated radiation shields. The specifications say that with full-sun solar power for the fan, the aspiration rate is 0.96 m s^{-1}. Apparently this is sufficient to prevent large error. At night the fan is powered by two NiCad C-cell batteries alone, and fan aspiration is specified as just 0.4 m s^{-1}. We found that at night, the error may commonly be -0.6 °C or even greater with light winds and clear skies when there is a strong outgoing longwave radiation exchange with the cold night sky.

In this study the objective was to measure air temperature differences between the sites. To the extent that our instruments had similar exposure to sun and wind, the temperature-difference errors would be reduced because all systems would have similar absolute error. Differences in shading of the temperature sensors will also be partially correcting, because when solar panel of the Davis system gets more sun, the solar panel will be provide higher current and make the fan run faster and the batteries to be better charged. The fans of systems in shade will run more slowly, but radiation errors will also be smaller. Similarity of ground-surface albedo would also reduce errors (Huwald et al. 2009). Although it is beyond the scope of this paper, we anticipate providing a later report on likely errors in temperature measurements at the sites by examination of differences in wind speed and solar radiation.

Resolution and accuracy of other sensors, though somewhat limited, are consistent from one unit to another and are generally not erratic over time. The Davis "VantagePro" reports wind to the nearest of 16 directions (N, NNE, NE, etc.). Resolution of wind speed is 0.4 m s^{-1}. Solar radiation is measured with a photodiode that has a specified accuracy of 5%. The error could be larger under vegetation because of radiation spectrum differences from open sky conditions. Precipitation is measured with a tipping bucket rain gage with a 165 mm orifice. Our tests showed errors in the rain measurement, with the measurement being too high at low rainfall rates, good accuracy at moderate rates and increasingly too low as rainfall rate increased, perhaps by as much as 20% at very high rates. Tipping bucket rain gages are notorious for under reporting at high rainfall rates (USGS 2005) . For our purposes of relating temperature differences to antecedent precipitation in future studies, the accuracy of the Davis rain gages will be sufficient.

In most of this study we examine the differences in temperature between sites, rather than analyzing actual temperatures. The logged temperatures were 15-min averages. We averaged the 15-min data over each hour.

Topographic effects on air temperature

In studies to model temperature differences in Baltimore, MD (Heisler et al. 2007; Heisler et al. 2006), we found that as elevation increased, air temperature decreased on average by about 0.011 °C m^{-1}. This is

close to the dry adiabatic lapse rate[2], usually stated as 0.0098 °K m^{-1}. The difference in elevation between the lowest and highest of our Syracuse sites is about 132 m (Table 2). Thus we anticipate average differences in temperature between the lowest and highest of our measurement sites on the order of 1.3 °C.

However, the actual vertical temperature profile will vary greatly depending upon atmospheric thermal stability. Thermally stable atmospheres, when temperature increases with height above ground, develop under clear skies and low wind speed. Conditions of high stability lead to drainage of cold air to lower slopes and pooling of cold air in valleys. To create an intuitive index of cold air drainage at each site, we used the LiDAR Digital Elevation Model (DEM) to obtain the site elevation and the highest and lowest elevations within 2 km of the site. Then, site elevation minus the lowest elevation within 2 km and the highest elevation within 2 km minus site elevation were tabulated (Table 2). Relative elevation above the lowest was defined as the ratio of above lowest to the total elevation range within 2 km of the site. We defined an index of topographic influence on cold air drainage away from a site, Cold air Drainage Away (CDA), as relative elevation above the lowest within 2 km × absolute elevation above the lowest elevation within 2 km. Similarly, we derived an index that would be expected to predict Cold air Drainage Toward a site, CDT = relative elevation below the highest point within 2 km × absolute elevation difference between the highest point and the site elevation.

Table 2. Topographic indices for elevations within 2 km of each site

Site		Elev. m	Above lowest elev. over 2 km, m	Relative elev. above lowest over 2 km	Below highest elev. over 2 km, m	Relative elev. below highest over 2 km	CDA, m	CDT, m
1	Suburban hill	254	132	0.68	63	0.32	90	20
2	Campus	165	51	0.50	50	0.50	25	25
3	Drumlin	198	79	0.70	34	0.30	56	10
4	West side, S	122	10	0.11	87	0.89	1	78
5	East side	167	38	0.34	75	0.66	13	49
6	Park	163	48	0.39	76	0.61	19	47
7	West side, N	122	11	0.15	62	0.85	2	52
8	Valley	132	10	0.06	163	0.94	1	153
9	Reference	123	12	0.13	82	0.87	1	72
10	CBD	122	11	0.13	75	0.87	1	66
11	Forest	209	86	0.44	108	0.56	38	60

Above lowest = elevation in m above the lowest elevation within 2 km.
Relative elevation above lowest = ratio of site elevation above the lowest to total relief within 2 km.
Below highest = height in m below the highest elevation within 2 km.
Relative elevation below highest = ratio of below highest to total relief within 2 km.
CDA, Cold Drainage Away = Relative elevation above lowest × height of site above lowest elevation within 2 km.
CDT, Cold Drainage Toward = Relative elevation below highest × height above the site of highest elevation in 2 km.

Stability index

It is well known that urban influences on temperature vary with wind speed and cloud cover (Oke 1987; Brazel and Quatrocchi 2005; Heisler and Brazel 2010). The wind and clouds effects occur partly because

[2] A "lapse rate" is the decrease in air temperature with height in the atmosphere. The term "dry adiabatic" lapse rate applies when the air is unsaturated with humidity.

synoptic scale (general weather pattern) wind speed and cloud cover are determinants of atmospheric stability in the boundary layer, the lower air layer that is strongly affected by the surface of the Earth. With strong sun and light wind, the surface of the Earth becomes warm, air in lower layers becomes warm and buoyant and thus unstable, tending to rise and mix in large turbulent eddies with air above, thus expanding the boundary layer. These unstable conditions also mix air within the urban canopy layer, reducing horizontal temperature differences caused by urban structural differences. With clear skies and low wind speed at night, air near the ground surface cools by outgoing thermal radiation to the cold sky, and the air near the ground cools and becomes relatively heavy, so that mixing of air is much reduced. The atmosphere is said to be stable. With cloudy skies or moderate to high wind speed or both, the lower atmosphere is mixed only by the mechanical effects of rough objects, trees and buildings, and thermal stability is then defined as neutral.

Turner class, often referred to as Pasquill-Gifford-Turner index (Environmental Protection Agency 2000), is not based on a direct measurement of thermal stability, but is rather an approximate index of atmospheric stability that combines wind speed and cloud conditions from standard hourly airport weather observations along with solar elevation calculated from date and time of day. Turner Class varies from 1 for highly unstable, through decreasing instability in classes 2 and 3, to neutral in class 4, through increasingly stable in classes 5 and 6, to the most stable in class7, which occurs with clear sky and light wind at night. Class 7 conditions lead to large values for outgoing thermal radiation that are unmatched by the slight thermal radiation from the cold cloudless sky. This results in a cool ground surface and the cooling of the lower air layers. Classes 1, 2, and 3 occur only in daylight and classes 6 and 7 only at night. The numerical format is convenient for our analysis. For this study we used hourly cloud and wind speed data from the ASOS station at the Syracuse airport (Figs 1 to 3) to estimate Turner Class, as defined in Panofsky and Dutton (1984) and Environmental Protection Agency (2000).

Actual thermal stability depends upon conditions of the Earth's surface, such as presence of vegetation and buildings, and soil moisture. We use Turner class to represent the city-wide atmospheric conditions separate from small-scale differences in actual stability that may be caused by micro-scale differences in land cover. Some other stability indices may be more representative of actual stability because they are based on a more specialized direct measurement related to stability, such as difference in air temperature at two heights, solar radiation, or turbulence of wind (Hunter 2012; Environmental Protection Agency 2000).

Highly developed urban areas will generally not become as stable at night as rural areas, and because surface conditions are not included in Turner class, it will over-estimate actual stability in cities on clear, calm nights. However, this does not obviate the use of the Turner index in predicting when large urban temperature differences will occur.

The routinely reported hourly ASOS wind speed, which we used to calculate Turner Class, is an average from only 2-minutes taken just before the top of each hour. Thus there is undoubtedly more variability than would occur if a longer averaging time were used.

Analysis

Our analysis suggests how differences in ΔT are caused by land cover, topography, and atmospheric thermal stability, and how these influences are intertwined. Initial analysis consisted of averaging ΔT by site; hour of the day; stability class; and tree canopy, impervious, grass, and water cover at distances from 20 m to 5 km. We averaged ΔT by site over the entire data-collection period to evaluate overall site effects on temperature.

The LiDAR-derived cover data has a 1 foot (0.305 m) resolution and is split up into seven classes: (1) tree canopy, (2) grass/shrub, (3) bare soil, (4) water, (5) buildings, (6) roads/railroads, and (7) other paved surfaces. We combined classes 5 to 7 to generate an impervious surface layer. To work with the large amount of data, we resampled the datasets to 5-m pixels.

We combined data from all sites to evaluate ΔT as a function of tree cover and impervious cover. This was done by regression of ΔT on averages of tree cover and on impervious cover over the different distances of the sites, using Excel Trendline to try polynomial, linear, or exponential models for best fit as judged by r^2. We estimated the effect on average ΔT of a 10 % change in tree cover using the assumption that the slope of the linear regression of ΔT on percentage tree cover was predictive of the change in average air temperature that would result from a change in tree cover.

Although average ΔT_{all} over all hours of summer days has potential importance in urban planning, it could also be important, for example to evaluate impacts on peak electricity loads, to know how ΔT is related to time of day and synoptic weather conditions. We used average ΔT by site and hour of the day and also by site and Turner Class in order to graphically examine the diurnal pattern of temperature difference at each site. Similarly, we used site averages to look at the relationship between change in ΔT per unit change in Turner Class as a function of the difference in topographic indices CDT and CDA. We examined the relationship between tree cover and elevation by linear regression models in Excel.

For the analysis of land cover and topography on ΔT, we generally averaged land cover over 125 m or more around the sites. We expect a certain amount of unexplained variation owing to the close proximity of some sites to nearby obstacles, especially buildings, which may have significant influences on temperature owing to shading, emissions of thermal radiation, and wind blocking that go beyond the influence of the obstacles as impervious or tree cover. However, given the 11 temperature measurement locations that have different close micro-site conditions, if there are general trends of temperature with impervious or tree cover, we assume that those trends will be apparent. The eventual goal of this study is to account for much of the influences of nearby obstacles by including as predictors of ΔT the differences in building and tree volumes at a range of distances from the weather station sites.

To illustrate diurnal patterns of actual temperature as affected by land cover and topographic position, we charted the course of temperature at three sites over an 8-day period with differing synoptic conditions. The synoptic conditions were described by Sheridan's (2002) Spatial Synoptic Classification (SSC2) and the diurnal pattern of Turner Class.

Results and Discussion

Average temperature differences at measurement sites

The average ΔT over all hours for which all stations were reporting provides an initial view of temperatures at the 11 stations (Table 3). The reference site, generally the warmest, had the highest ratio of impervious to tree cover within 125 m (Table 3). Average ΔT ranged from 0.10 °C (cooler than the reference site) in the CBD (site 10), which was only about 800 m from the reference station, to 2.08 °C at the forest site (11).

Table 3. Average, maximum, and minimum values of ΔT based on hourly averages of ΔT with site 9 as the reference, for times with all stations reporting. "Canopy to 125 m" and "Impervious to 125 m" are averaged percent of cover over a 125-m buffer around each site. The cover layers were derived from the LiDAR cover analysis. "El. diff." is site elevation – elevation at the reference site.

	Site	Avg. ΔT °C	Max. ΔT, °C	Min. ΔT,°C	Hour of max ΔT	Hour of min ΔT	Canopy to 125 m	Impervious to 125 m	125-m Imp/Can	El. diff., m	CDT-CDA m	ΔT/ Turner
1	Suburban hill	1.64	5.3	-2.7	20	7	36	17	0.5	131	-70	-0.12
2	Campus	0.68	3.1	-1.3	19	13	17	51	3.0	42	0	0.13
3	Drumlin	1.32	4.1	-1.9	9	18	43	31	0.7	75	-46	-0.09
4	West side, S	1.05	4.6	-3.9	22	11	23	46	2.0	-1	77	0.43
5	East side	1.38	5.6	-3	7	18	38	36	0.9	44	36	0.19
6	Park	1.25	5.3	-1.7	8	19	46	21	0.5	40	28	0.00
7	West side, N	0.50	3.6	-1.7	6	16	12	66	5.5	-1	50	0.20
8	Valley	1.93	6.6	-2.3	21	10	43	21	0.5	9	152	0.67
9	Reference						5	74	14.8	--	71	
10	CBD.	0.10	1.3	-1.9	8	7	7	86	12.3	-1	64	0.00
11	Forest	2.08	6.1	-1.8	9	18	85	0	0	86	22	-.04

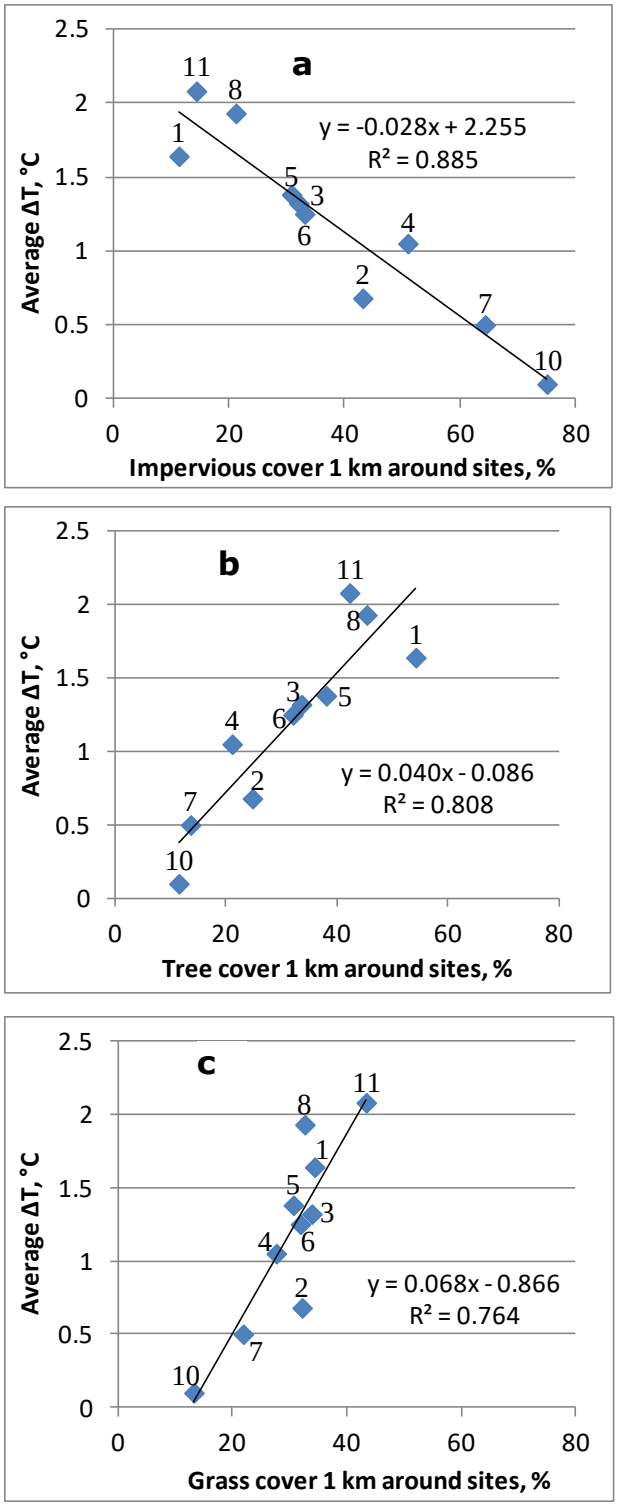

Fig. 4 Average ΔT over all hours versus **a** impervious cover, **b** tree canopy cover, and **c** grass cover within 1 km of each site. Data point labels indicate site numbers.

Average tree canopy, impervious cover, and grass cover around the sites are highly correlated with the average temperature differences (Fig. 4). Averaged over all hours and all days, temperature difference (ΔT_{all}) decreased (temperatures became warmer) with increased percent impervious cover, and ΔT_{all} increased with increased percent tree cover for all distances around the sites, from 20 m to 5000 m. The relationship between ΔT_{all} and impervious cover 1 km around the sites had an r^2 of 0.89 (Fig. 4); r^2 for other distances ranged from 0.70 to 0.91. Values of r^2 for ΔT_{all} versus average tree cover were generally slightly smaller than for impervious cover and more scattered, but they were greater than 0.74 for all distances. For 1 km distances around the points, the ΔT_{all} versus grass cover r^2 was 0.76, but the absolute value of the slope, 0.068 °C/1 % increase in grass cover, was larger than for tree canopy (0.040/1% increase in tree cover) or the absolute value for impervious cover (-0.028 °C/1% increase in impervious cover). Open grass surfaces are usually warmer than treed areas at mid-day, but cool more on clear nights because of the greater exposure to the cold night sky.

Many cities measure the status of their urban forest by the overall portion of the city area covered by tree canopy, usually as estimated by various remote sensing approaches. The canopy area may be increased by tree planting programs or decreased by enhanced development, devastating storms, insect infestations, or tree diseases. In this study, an approximation of the change in average summer temperature that would be produced by a given change in tree cover in Syracuse is given by the slope of the ΔT_{all} versus tree cover regression line. For tree cover averaged over 1 km distances around the points, the slope of 0.040 °C per 1 % tree cover change predicts that a tree cover increase of 10 % would create about a 0.4 °C reduction in average summer temperature.

Assumptions in this approximation of temperature change include: 1) the locations of the weather stations reasonably sample the cover values across the city, 2) that the tree cover addition or removal would also change impervious and grass cover approximately according to the current relationships between tree cover, impervious cover, and grass cover, and 3) that soil moisture conditions in 2010 were representative of typical years. Over the entire city, the LiDAR land cover percentages are: tree canopy 26.7 %; impervious 41.4 %, and grass 29.4 %. Water cover was a very low 2.5 % of the city. The corresponding averages for 1 km around the 11 weather stations were similar: tree canopy 30.1 %, impervious 40.5 %, and grass 28.9 %. The 1-km areas around the weather stations averaged only 0.56 % water because we had no stations close to Onondaga Lake, a portion of which is within city limits.

Tree plantings that covered only grass surfaces would have little effect on average air temperature, though midday actual maximum temperatures would be expected to decrease and nighttime minimums increase. In a study of microclimate in an urban park in Syracuse (Herrington et al. 1972) large open spaces averaged 0.4 °C warmer than tree shaded locations in the afternoon, but 0.5 °C cooler than treed areas after sunset. Tree canopy additions that covered only impervious cover would provide the largest reductions in average air temperature and reductions in both maximum and minimum temperatures.

Differences in soil moisture may influence air temperatures in several ways. Dry soils have lower thermal admittance or thermal entropy (Heisler and Brazel 2010). In response to a heat input or removal, the surface of a dry soil changes temperature more than the same soil when wet. Evapotranspiration by vegetation is a cooling process that may be limited by dry soils. Thus, in very dry or wet years, the relationship between changed tree cover and average temperature may differ from the linear trend we see in 2010. Total precipitation over the summer of 2010 was similar to the long-term average. In the 30-yr average from 1971 to 2000 (NCDC, http://lwf.ncdc.noaa.gov/oa/climate/climatedata.html) July, August, and September monthly totals of precipitation at the Syracuse airport were 4.6, 4.2, and 4.2 inches (117, 107, and 107 mm). In 2010, the comparable monthly totals were 4.3, 6.4, and 2.7 inches (109, 163, and 69 mm). Although the 2010 distribution was less even than the average, soil moisture was probably similar to average. The high August total was caused by an extraordinary 1-day total of 4.5 inches (114 mm) on August 23 that probably maintained high soil moisture through the longest dry span of the study period from August 25 to September 3.

Some studies (Brazel et al. 2000; Heisler and Brazel 2010; Grossman-Clarke et al. 2010) indicate that in dry climates the relationship between cover and average air temperature could differ from city to

city or across different sections of a city depending upon whether extensive irrigation is practiced. Especially in dry climates, irrigation in has been thought to increase the net radiation input going to enhanced latent heat exchange in evaporation and transpiration, which results in cooler air, and less of the net radiation going to sensible heat exchange, which heats air. However, there is some difference in research results regarding the effect of irrigation in modifying urban temperatures. Meso-scale modeling by Georgescu et al. (2011) suggested little irrigation influence even in desert climates, whereas the results from Grossman-Clarke et al. (2010) indicate irrigation does significantly affect temperatures, though more so at a micro- or local scale than at the meso-scale.

Of interest for urban planning would be the average temperatures in the different land-use categories. Using the classification from the 2006 NLCD (Multi-Resolution Land Characteristics Consortium (MRLC) 2006), Table 4 shows the average temperature below the reference temperature, ΔT, actual average temperatures over all hours, and the actual maximum and minimum hourly temperatures. Average temperatures decreased from 21.8 °C for the most developed sites to 20.6 °C for the "shrub, scrub." Maximum and minimum temperatures more strongly reflect the dynamics of the processes that determine temperature differences, especially the minimum temperatures. The land use classifications in Table 4 are the values for the 30-m resolution pixels in which the weather stations were located, and these classifications therefore represent the NLCD cover classifications in the immediate vicinity of the site. For example, at slightly broader scale, sites 9 and 10 would be in Developed, high intensity land use. The forest site, site 11, is in fact a mature forest with trees about 25 m tall rather than shrub or scrub land; the misclassification by NLCD may have resulted from the fact that it is a managed forest with a small portion where tree harvesting took place recently, but the weather station was not near the harvested areas. Site 1 is grassland in the immediate vicinity of the station, but low intensity developed if a slightly larger area is considered.

Table 4. Average values of ΔT, average actual temperatures, highest maximum, and lowest minimum temperature over for all hours during which all stations were reporting (1394 h) between July 15 and September 15.

Land use	Sites	Avg. ΔT, °C	Avg. temp. °C	Maximum hour, °C	Minimum hour, °C
Developed, medium intensity	2, 4, 7, (9), 10	0.58	21.82	33.42	9.25
Developed, low intensity	3, 5, 8	1.54	20.73	32.62	7.35
Grassland, herbaceous	1	1.64	20.64	31.32	9.05
Shrub, scrub	11	1.67	20.63	31.72	9.42

Temporal pattern of temperature differences

Averages of ΔT by hour of the day over the period of the study ranged from 3.5 °C at 2200 hours (10 PM EST) at the valley site to -0.5 °C (warmer than the reference site) at 1200 (noon LST) at West Side S site 4 (Fig. 5). Average hourly midday temperatures were up to about 2.0 °C cooler than the reference site, and this occurred in the forest (11).

The average of ΔT by hour of the day, ΔT_{hr}, exhibited strong topographic influences that may be seen in Fig. 5. The valley site (8) had by far the largest hourly average diurnal temperature swing from a ΔT_{hr} of about 0.15 °C at midday to 3.5 °C at 2200. Examination of cover and topographic differences provides an intuitive explanation for much of these temperature differences.

The valley site is on a lawn in a spacious backyard in a highly treed neighborhood with single-family, moderate-sized homes on lots of about 1400 m^2. Although cover within 125 m from the site consists of 21 % impervious, 42 % tree canopy cover, and 33% grass, mid-day temperatures average only about 0.2 °C cooler than the reference site. In contrast to the mid-day ΔT_{hr}, the valley site begins to cool relative to the reference, i.e. ΔT_{hr} increases, late in the afternoon, and, our interpretation is that the cooling rate is accelerated by cold drainage from the valley sides over the next 3 hours.

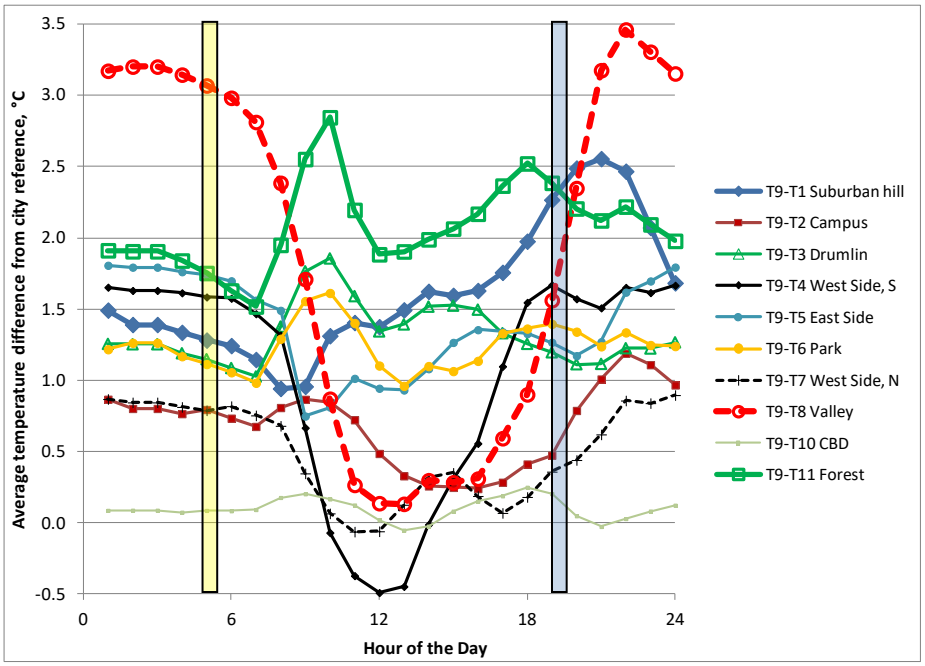

Fig. 5 Average ΔT (temperature difference) by hour of the day for all 1394 hours in which all stations were reporting during the summer of 2010. The range of times of sunrise and sunset are indicated by the yellow and blue bars.

The forest site (11), which is about mid-way up on the east valley slope, is the coolest at midday, but for 2 or 3 hours just after sunset, it cools less rapidly than other sites. On average, the forest cools more slowly than the reference site (ΔT_{hr} decreases) during the night. We generally expect less developed areas to cool more rapidly at night than more developed areas (Chow and Svoma 2011), but both the forest cover and the uphill position probably combine to reduce the cooling rate at the forest, a complex relationship that will be a challenge to deal with in empirical modeling. Following the second hour after sunrise, both forest and reference are probably heating up, but the reference much more rapidly, so that the forest maximum ΔT_{hr} occurs in the 1000 hour.

It is important to remember that ΔT is relative to the particular reference site. Had we placed the reference site in a warmer location, for example in the center of a large asphalt parking lot, values of ΔT would often have been greater.

Influence of atmospheric stability

When average values of ΔT are plotted versus Turner Class, the sites fall into groups in response to topography in the vicinity of the sites (Fig. 6). Sites that are at relatively low elevations compared to nearby high elevations are receivers of cool air under stable conditions and they thus have increasing ΔT with increase in atmospheric stability. By far the most noticeable of these is the Valley site, but the Campus site (2), as well as sites 4, 5, and 7 have increasing ΔT with stability. Sites 4 and 7 are on generally flat ground about 1 km away from a hill.

Sites at high elevations, such as the suburban hill site (1) and site 3, which is near the top of a drumlin, donate cool air in high stability conditions and thus tend to become relatively warm with increasing stability. Topographically, the Forest (11) and the Park (6) sites are midway in the range from donor to receiving sites and they have similar tree cover. However, nearby impervious cover is greater at the Park location, and temperatures are generally warmer (ΔT is lower).

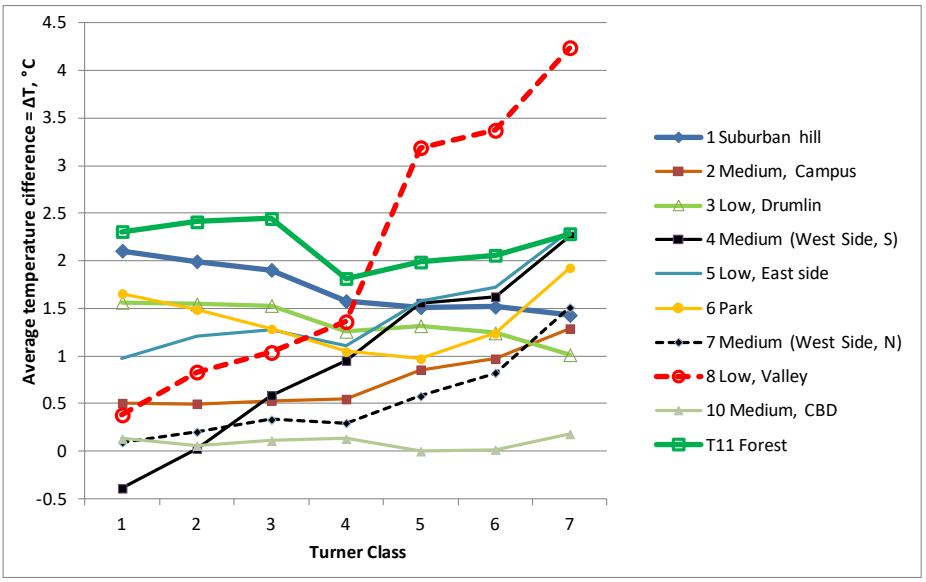

Fig. 6 Average ΔT by Turner class for 10 of the sites relative to the city reference site. For developed land use classes according to NLCD, the legend includes development intensity. In general, difference in ΔT with Turner is more a function of topography than development, but overall average ΔT is a function of development intensity or impervious cover.

The indices CDT and CDA (Tables 2 and 3) provide a form of quantification of site response to conditions that promote cold air drainage and pooling. These indices may be mapped over the entire spatial domain of the study as in Figs. 7 and 8. In these figures we see that site 8 is in an area of low CDA and high CDT on the valley floor, but beyond the valley are hills with high values of CDA. Much of the southern part of Syracuse is an area of high CDT.

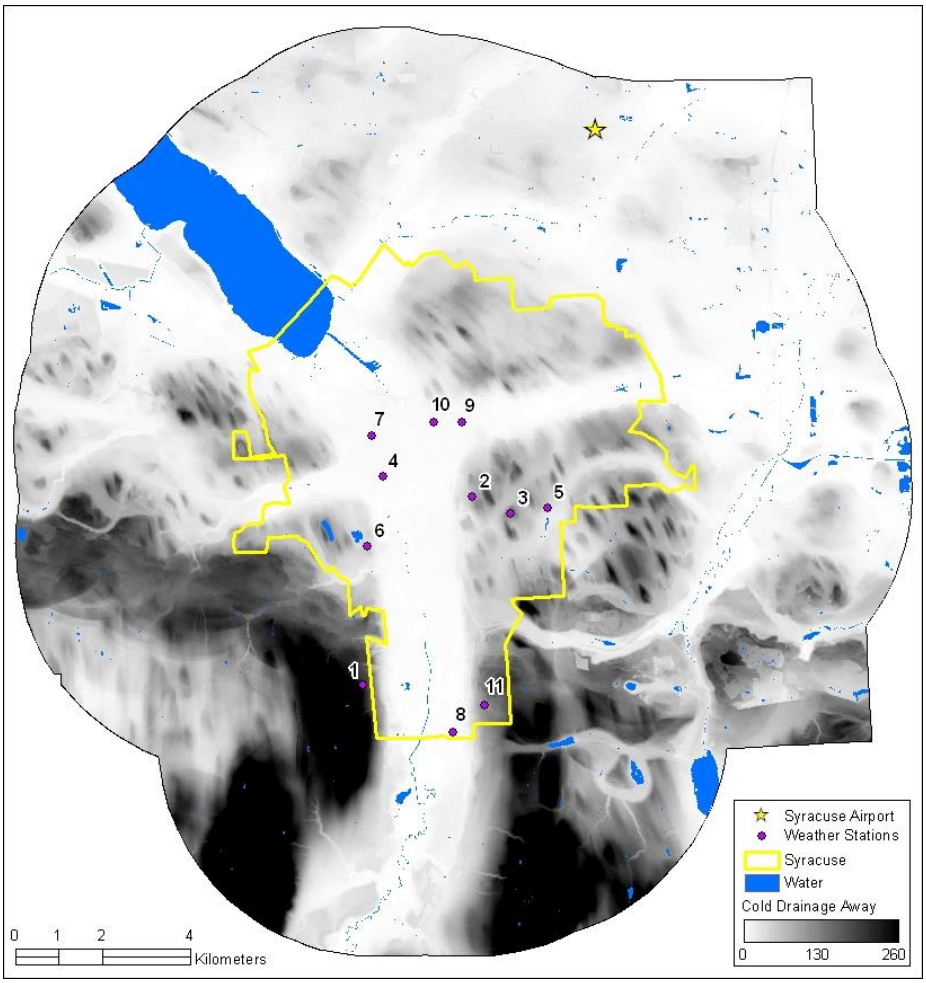

Fig. 7 An index of cold drainage away (CDA) from points across the region calculated as relative elevation within 2 km times actual elevation in m above the lowest point within 2 km. The elevation is from a digital elevation model derived from high-resolution LiDAR acquired in 2010.

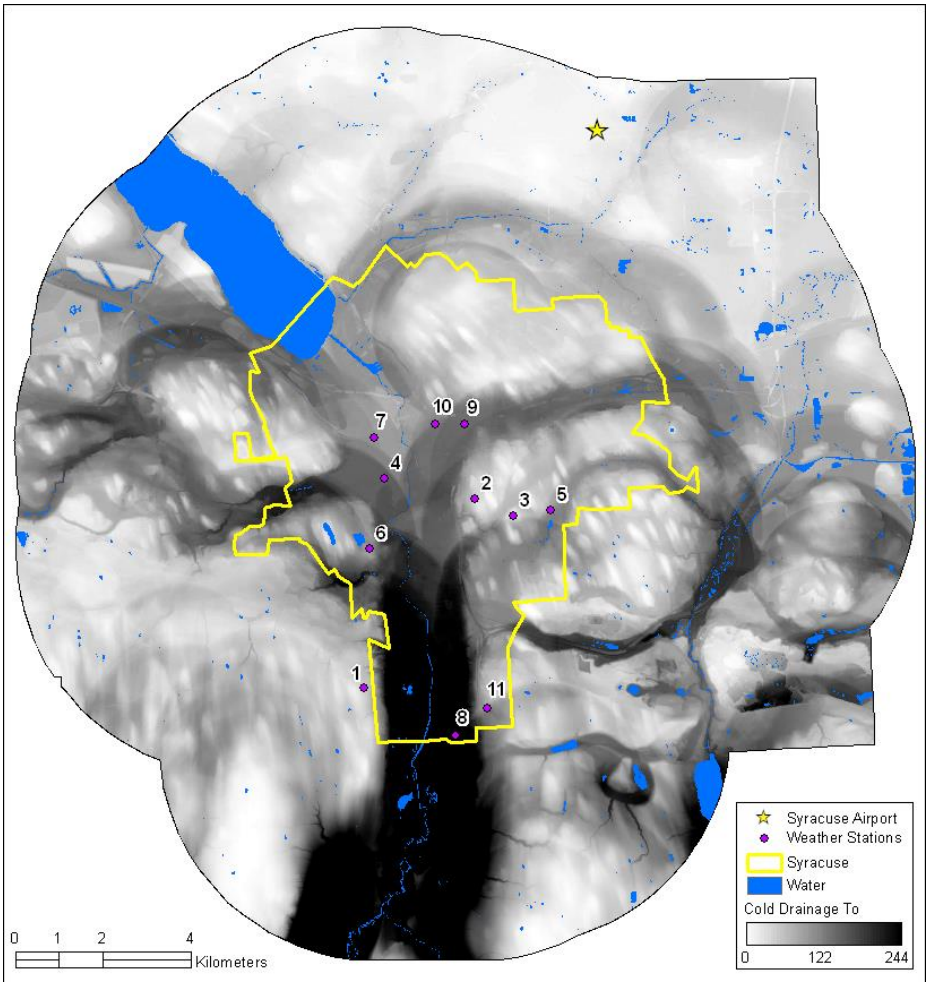

Fig. 8 Index of cold air drainage toward (CDT), estimated as relative elevation below the highest point within 2 km times actual elevation in m below the highest point within 2 km. Note that the valley site 8 is within the area of highest index for drainage toward.

The difference CDT – CDA is predictive of the trend in the curves of ΔT versus Turner Class in Fig. 6. Using a simple linear model for ΔT versus Turner class for each site, the resulting r^2 values are above 0.81 except for sites 6 and 10, for which r^2 is near 0, and site 11, for which r^2 was 0.16. These slopes and r^2 values can be grasped intuitively in Fig. 6, where, for example, the points for site 4 are essentially in a straight line and the r^2 in the ΔT versus Turner Class was 0.99. The dependency of ΔT/Turner Class on CDT-CDA is shown in Fig. 9, where a polynomial curve is fit to the data points. Had the three sites with low relationship between ΔT and Turner class not been included, ΔT/Turner Class would be an almost linear function of CDT-CDA.

Much of the variance seen in Fig. 9 is caused by micro-scale cover differences. The largest of these differences is probably between site 4, which has a value of ΔT/Turner of about 0.42 °C and impervious/canopy cover within 125 m of 2.0 (Table 3), and site 10, which has just slightly lower CDT-CDA than site 4, but ΔT/Turner near 0 °C. The high value of impervious/canopy cover within 125 m of site 10, 12.3, is evidently the cause of its negligible response to Turner Class. This indicates that the estimate of 0.4 °C of average cooling by an additional 10 % of tree cover applies to the city as a whole and that some portions will have greater or less response. For some cities, including New York (New

York City Department of City Planning 2012), GIS data sets of building volume are available. Distribution of building volume is likely to be more closely related to ΔT than simple impervious cover.

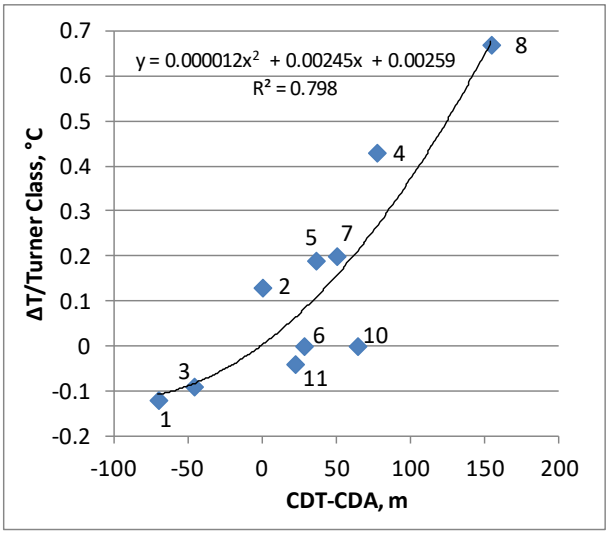

Fig. 9 Change in ΔT per change in Turner Class versus the difference in CDT and CDA

The relationship between ΔT, CDT, and CDA shows that relatively simple indices may be used to characterize temperature patterns across a landscape, including, with some modification for land cover, in urban areas. The indices CDT and CDA were developed on an entirely intuitive basis without analysis of an optimum form, such as the optimum distances over which the indices are derived. An optimum distance would most likely be different in cities with greatly different topography. Also, ΔT in this study is based on a reference site within the city, and therefore depends upon the characteristics of that site. Although, at this point the use of this concept for another city would require empirical analysis, it suggests that from measurements from a sparse network of temperature monitoring stations, topographic influences on temperatures across a city can be mapped in a fashion similar to Figs. 7 and 8. The elevations we used are from a high-resolution DEM, though less precise DEMs would probably suffice where topography is similarly dramatic.

One concern in using empirical methods to estimate land cover or topographic influences on air temperatures is that cover is often correlated with elevation. Fig. 10a shows the relationship between tree cover from the LiDAR data averaged over 500 m around each station and site elevation for the 11 weather stations in the Syracuse area. The four sites with the lowest elevation have the lowest tree cover, between 10 and 22%, a situation that is a result of historical development patterns (Hyde 2011). The results here suggest definite influences of cover on temperature; they also suggest that topographic influences may under some conditions overwhelm the cover influences.

Another concern in empirical analyses of cover influences is the accuracy of remotely sensed cover. Fig. 10a uses tree cover derived from the LiDAR data, while Fig. 10b uses tree canopy cover from NLCD data, which has been shown to generally underestimate both impervious cover and tree canopy cover (Greenfield et al. 2009). Clearly the underestimation of tree cover by NLCD is evident for data from Syracuse. Tree cover within 500 m of the 11 sites averaged 30.6% by the LiDAR data, and only 14.9 % by the NLCD data.

Although the temperature measurements surely contain some radiation error, we believe those errors would not substantially modify the pattern of average temperatures in Figs. 5 and 6. Maximum

absolute errors would be about 0.6 °C because of outgoing thermal radiation at night with Turner Class 7. Error in ΔT would be smaller, because all of the stations experience some about of error. The direction of the error with Class 7 would probably be to reduce ΔT, because the reference site was the most open to night sky. The more open the site, the larger the radiation error, which would cause the reference temperature to register too low and become closer to other sites with buildings or trees blocking view of the cold night sky.

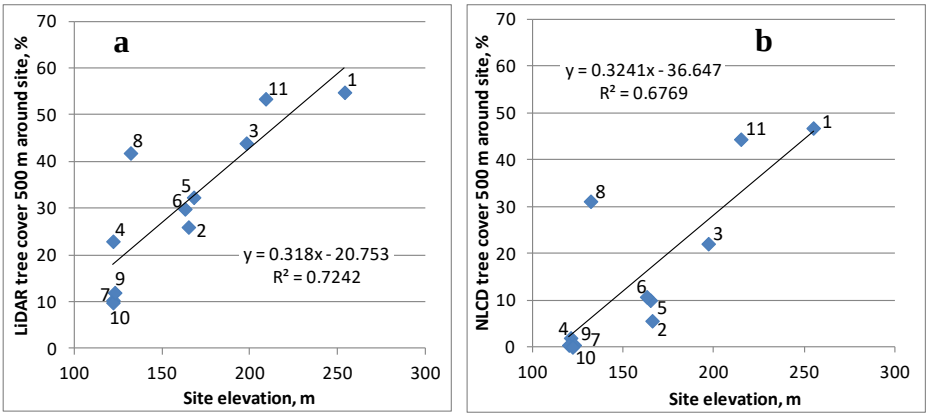

Fig. 10 Relationship between tree cover over 500 m around 11 weather station points and elevation of measurement sites **a**) tree cover averaged from LiDAR data, and **b**) tree cover averaged from NLCD 2006.

Patterns of actual temperatures

For various purposes, including heat health warnings for cities, it is important to know the frequency of particular temperature patterns occurring. One classification system is the Spatial Synoptic Classification (SSC2) that is maintained by Sheridan (2002). The classification for over 300 stations, including Syracuse, is available for free download from http://sheridan.geog.kent.edu/ssc.html. As an example of the use of SSC2, consider that for Syracuse the days in Fig. 11 fall into six categories. August 26 was "moist moderate," meaning cloudy, perhaps with high clouds, neither extremely hot nor cold. In long-term records, moist moderate occurs on 25 % of August days in Syracuse, and it occurred on 29% of days in August 2010. These conditions, which lead to Turner class 4 for much of the day, as Fig. 11 shows, create only small temperature differences across the city. August 28 to 30 were classified as dry moderate, which is another common pattern occurring on 26 % of days on average, and 29% of days in August 2010. Several categories of tropical air, which can reach high and potentially unhealthy temperatures, were present on August 31 and September 1 and 2; these usually occur about 25 % of August, and were present on 35 % of days in August 2010. Fig. 11 suggests that in modeling ΔT, SSC2 may be useful as a predictor variable, and also that SSC2 combined with ΔT predictions would be useful for specifying parts of a city that are most at risk.

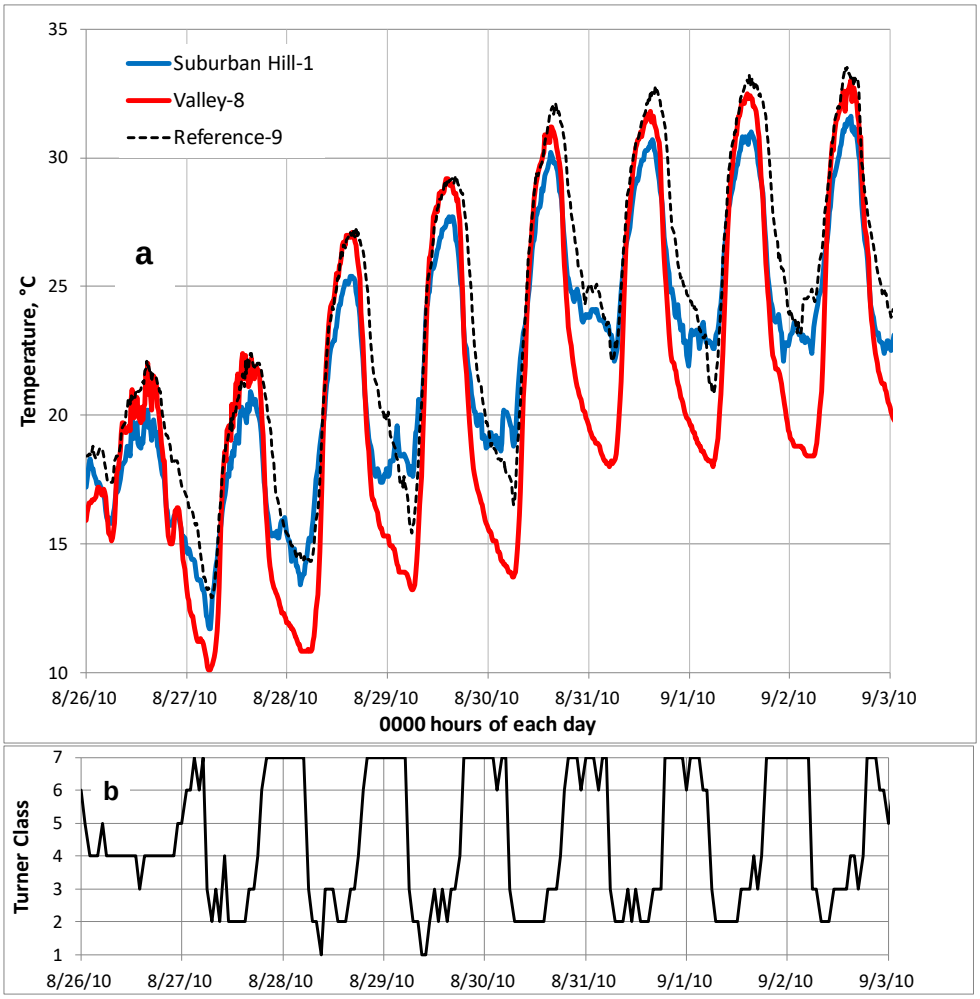

Fig. 11 Patterns of measured temperature at three Syracuse sites with varying urban structure and topographic position **a**, and Turner class by hour of the day **b**.

Conclusions

Estimating influences of tree canopy on urban temperatures is a challenge because, as this study shows, atmospheric stability and topography can have large and confounding influences on temperature. Furthermore, stability, topographic, and land-cover influences operate over a large range of spatial scales. Stability influences vary diurnally, but with irregular synoptic weather influences superimposed on the diurnal pattern.

Additional challenges in predictive modeling of temperature patterns are inherent in the correlations among predictors. In Syracuse, historical development generally proceeded from low-lying land near Onondaga Lake to current conditions in which the dense CBD is on relatively flat low-lying land. At the 11 locations of our weather stations, canopy cover tended to be higher and impervious cover lower with increasing elevation.

Compared to the inner city reference site, temperatures averaged over the duration of this study, July 15 to September 15, 2010, ranged up to 3.5 °C cooler at 10 PM EST (11 PM EDT) in the valley area of southern Syracuse. The overall coolest site, with an average ΔT of 2.08 °C was in a stand of mature mixed conifer and deciduous trees in a forest in southern Syracuse. The forest also had the coolest mid-day temperatures, averaging about 2 °C cooler than inner city. Temperatures at the valley site during mid-day were similar to inner-city sites, but overall, because of cool night temperatures, the valley site had the second coolest average temperatures. The valley site also had the largest 1-hr ΔT, 6.6 °C cooler than the city center reference site 7 km to the north.

The results here suggest that a modest network of weather stations, combined with imagery to describe tree canopy and impervious cover, can be used to make operational estimates of the citywide effect of changing tree cover on average temperature. In our analysis of cover averaged over a radius of 1 km around the weather station sites, a tree cover increase of 10 % would lead to a 0.4 °C average temperature reduction. This estimate assumes that the tree planting would change imperious, grass, and water cover approximately according to the current relationships among these cover types. Tree plantings that reduced only grass cover and not impervious cover would have little effect on average temperature, although midday temperatures would be lower.

The goal of future regression analysis will be to sort out tree canopy influences from the effects of impervious cover over a wide range of horizontal spatial scales and under a wide range of topographic, soil moisture, air humidity, cloud, and wind conditions. The results will permit spatial mapping of temperature patterns for any hourly synoptic weather observation (Heisler et al. 2007; Heisler et al. 2006; Ellis 2009). Evaluation of tree influences in winter, which will follow in yet another study, is also important, because management goals should be based on influences over the entire year. There is relatively little study of urban heat islands for winter periods. Applications include estimating the effect of changing tree cover on cooling degree days (CDD) and heating degree days (HDD), which integrate over a season the daily temperatures above (CDD) or below (HDD) a threshold. Over a season, CDD predicts electric power needs for air conditioning of buildings, and HDD predicts fuel use for heating buildings.

Indices similar to some developed here will be useful in future analyses. One is the close relationship between temperature differences and the atmospheric stability criterion, Turner Class. Another is the use of relative elevation, that is, site elevation relative to other elevations within a certain radius, which was 2 km here, to form cold drainage away (CDA) from and to (CDT) a location. These can be relatively easily mapped for a large area such as the 340 km^2 domain in this study. The linkage between the ratio ΔT/Turner Class versus CDT-CDA suggests some similar form of these simple cold-air-drainage indices will be useful in predicting ΔT.

The analysis in this paper of tree canopy cover effects on average temperatures across the city may provide a template for a less complex method for predicting tree influences for urban planning on an operational basis. Many of the considerations evaluated here will apply to urban climate of other cities,

although the climates of many cities are much more influenced by proximity to large bodies of water and by irrigation than Syracuse.

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I-81 VIADUCT PROJECT COMMENT SHEET

Name: Rev. Msgr. James P. Lang
Address: 425 Beechwood Avenue, Liverpool, New York 13088
Phone: 315-470-1437 Email: jplang@aol.com

9.27.2021

General Comments:

1. On the one hand, the efforts of the design time have been remarkable, and the listening sessions have been many – all were well staffed. Thank you. All were well insightful and well quailed.

2. On the other hand, having lived on Walnut Park for the better part of a decade, I am versed in what it takes to fill the SU/ESF/Hospital hill each morning, and to empty in at rush hour. To these "crunch times" we may add Game times. So far I am not impressed with the ability of the Grid system to replace the current methodology.

3. There has been much conversation regarding the displacement of people in the 1950's – 1960's. There is "no way back" machine that will easily restore those areas, and the jeopardy that these plans may hold for Pioneer Homes, raises serious design and justice issues. We cannot go back to what was, we can only move forward. As we all know, or at least suspect, the impact on residential areas may reach beyond the area of Pioneer Homes. We do not need a repeat of the challenges caused by the original building of Route 81 through the city.

Specific Concerns:

1. The proposed round-about at Dr. King School? Protecting our children comes first. The safety issue alone provides a principled reason to proceed with wisdom and caution. The round-about method requires more study. I for one, believe that the use of a round-about as a 'deceleration' point is contradicted by the volume of traffic that move through this point and with our children in proximate range it is poignantly dangerous.

2. The primary challenge to the proposed 81 – current 481 Exit – The Dewitt/Wegman's/Lyndon Corners location.

3. Adding to the "crunch" of the joining to Route 690 at its junction with the current 481 North. The stretch of Route 481 from leading up to the Dewitt/Linden Corners/Wegman's exit to the NYS Thruway needs to be entirely redesigned. The Dewitt/Linden corners/Wegman's exit is a major issue. If we had built the Fayetteville – Chittenango by-pass when it was discussed decades ago our situation would have been improved. Now we will pay the price of avoiding difficult challenges.

4. Destiny USA and other major business that have developed along the current city route 81 as during the last 60-70 years. Business owners have good reason to be concerned about future impact of BL 81. As we prepare for the new future, has an economic study been done on the impact of this change to the business along the current 81, and the impact of limiting easy access to Destiny USA with its carefully studied and structured financial plan?

RECEIVED
SEP 28 2021
BY:

I-81 Viaduct Project
Comment Sheet

Name:

Address: **City:** **State:** **Zip:**

Phone: ( ) **Email:**

Comments:

Mail comments to:
I-81 Viaduct Project
New York State Department of Transportation
333 E. Washington Street
Syracuse, NY 13202

Submit comments online:
www.i81opportunities.org

Information Hotline:
toll-free: (855) I81-TALK (481-8255)

To Mark Frechette, P.E. Project Director New York State Department of Transportation,

My name is Elizabeth Leich I live at 326 Kirsch Drive Mattydale, NY. I am in agreement with the Route 81 plan and know that a lot of thought has gone into the planning.

I would like to add a request on behalf of the people living in the area that I live. I am requesting that a sound barrier wall be placed along the border of the Roxboro Middle school campus grounds; the land that borders the back of Roxboro Middle school from the end of Kirsch Drive to the pool recreational area of Orchard Estates Apartment complex.

The reason for my request is that the noise level has been steadily increasing over the years. And the grounds of Roxboro school serve as an echo chamber and the noise goes right into the homes of the people who live on the north side of Kirsch Drive as well as those at the very end of the 400 block of Kirsch Drive in Mattydale. I believe also that the sound level from the traffic has a negative effect on the school children of Roxboro Middle school.

I ask that representatives from the New York State DOT visit the back field of Roxboro Middle school to evaluate the traffic noise level, which is 24/7 continiously, effecting daily life and sleep of residents. I too extend an open invitation to the NYS DOT and project members, to come to my home any time at 326 Kirsch Drive and go to my backyard and actually stand there and experience the sound. You can even ask to stand in my home hear the continual noise level.

Please consider this to be a quality of health/life issue for the numerous families living on the north side of Kirsch Drive bordering Roxboro Middle school field.

Sincerely,

Elizabeth Leich
326 Kirsch Drive
Mattydale, NY 13211
315 913-8612

RECEIVED
SEP 13 2021
BY:

RECEIVED
OCT 15 2021
BY: postmarked 10/14/21

10/14/21

I-81 Viaduct Project Team
i81opportunities@dot.ny.gov

Mark Frechette
Project Director
New York State Department of Transportation
Region 3, 333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

The comments provided in this communication are submitted regarding the Draft Environmental Impact Statement (DEIS) prepared by the New York State Department of Transportation (NYSDOT).

I strongly agree with the NYSDOT's finding that the Community Grid is the right alternative for Syracuse and the larger Central New York region. While there are still elements of the Project that need improvement, I find that the Community Grid is clearly the best build alternative for the reasons stated in sec 8-3, pg. 8-6 thru 8-8 of the DEIS.

Throughout the Syracuse Challenge and the Environmental Impact study phases of the Project, I have been enthusiastically engaged in opportunities for stakeholder engagement as a resident of the City of Syracuse. I was an active member of the NYSDOT Stakeholders Advisory Working Group (SAWG) until that opportunity for stakeholder engagement was disbanded. I am a member the Mayor's 81Cooperative, the Moving People Transportation Coalition, the Community for the Grid, the Northside I-81 Advisory Group, Greening USA, and I have worked in a support capacity with a variety of other grassroots community groups that have advocated for the Community Grid build alternative. I will continue to seek opportunities to work with the NYSDOT Project Team whenever possible throughout the design and construction phases of the Project to ensure that the best possible Community Grid alternative is designed and implemented with the least negative environmental impacts possible.

I appreciate the NYSDOT's earnest efforts at public participation in selection and design of the build alternative for the Project. I know from firsthand experience of the improvements that the Project Team has made to the Community Grid in response to feedback from stakeholder groups that I am a member of and appreciate NYSDOT's willingness to incorporate recommendations from stakeholders into the design of the Project.

The purpose of this communication is to identify critical design features to be addressed in the Final Environmental Impact Statement (FEIS) that I find require further mitigation to eliminate or lessen adverse environmental impacts associated with the Community Grid alternative. Since I have participated in a variety of stakeholder groups that are submitting comments to NYSDOT during the current public comment period, I am including only the six (6) recommendations in this communication that I see as most critical for designing and implementing the best possible Community Grid.

1) It is critically important for the public to be kept informed and provided with ongoing opportunities to provide continuing input to the Project Team through the design and construction of the Project. The FEIS should provide details for how opportunities for public engagement through completion of the Project will be provided and how that input will be addressed. I believe it was a mistake to disband the SAWG process and hope that MYSDOT will form technical advisory and citizen advisory groups to address questions during design and construction similar to the SAWG.

2) I appreciate NYSDOT's inclusion of a Land Use Working Group for surplus land that will become available as a result of the Project. This group must include the City, the school district, neighborhood representatives, environmental justice groups, economic opportunity and development organizations, and other stakeholders. Land use is a priority concern for the City and its residents. The City should lead the working group and have final say on all land use decisions. Reuse and redevelopment of these potential sites should be focused on providing community benefits, which include economic development, recreation, and affordable housing among many others. These sites should meet these various needs based on their location, size, stakeholder input and feasibility. Furthermore, this group should be convened as soon as possible after the release of the FEIS not after construction as the NYSDOT indicates.

3) I, like many stakeholders, am concerned about the current design and position of the roundabout at MLK Elementary School. I request that you listen to the overwhelming public feedback on this critical element of the Project and respond accordingly in the FEIS. While a variety of options have been proposed, I find the best alternative for this design element would be to move the round further south to Kennedy Street where ample land is available to execute a roundabout that can also serve as a gateway to the City.

4) I acknowledge and appreciate NYSDOT's participation in Syracuse Build and the I-81 Big Table processes. I challenge the NYSDOT to aim high on local hiring. So far, the City and NYSDOT have worked reasonably well together in planning to ensure city residents – especially women, people of color and veterans – get equitable opportunities for jobs and careers from the project. The most critical stages are happening now and I urge NYSDOT to set aggressive goals in its application to the Federal Highway Administration for local hiring and commit to aggressive programs to train and prepare city workers.

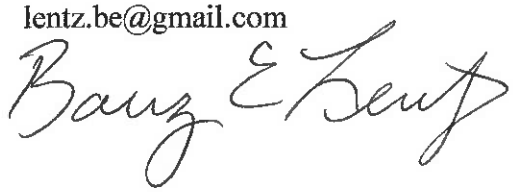
5) Sections 3.4.3 & 5.6 of the DEIS indicate that the intent of NYSDOT is for the Community Grid to be designated as a qualifying highway. This would allow STAA vehicles, including tractor trailer combinations greater than 65 feet, tractors with 28 foot tandem trailers, and 53 foot trailers to use that highway and any other highway street within one linear mile of the qualifying

highway. The DEIS proposes a travel lane width of 12 feet for certain portions of the project area, where sections of the roadway would transition between a speed limit of 55 MPH and 30 MPH. I recommend that the NYSDOT remove the qualifying highway designation to ensure that the Community Grid is used as a network of city streets, not as a highway. NYSDOT should rework street widths to ensure that no travel lanes are wider than 11 feet for any street involved in the Project and that the majority of streets conform to a preferred width of 10 feet. This is prudent, as a 12 foot travel lane does not support a 30 MPH design speed and is inappropriate in this context. Furthermore, I request that NYSDOT revise its designs so that no corners or curbing at rebuilt intersections exceed 15 feet in corner radii pursuant to NACTO standards. Appendix A-1 reflects varying corner radii at intersections, including some in excess of 35 feet. Where exceptions to this dimension appear to be required, NYSDOT should first explore and document other interventions that allow for wide turning vehicles rather than larger corner raii.

6) Currently, the DEIS contains no substantive provisions concerning transit accommodations within the project area. I request that the Project design include transportation features to enhance the effectiveness of the Community Grid for bus riders, pedestrians, and bicyclists. This should include installing park-and-ride vehicle lots to be maintained by CENTRO with covered protection for bus riders at several key locations to be identified in coordination with the City of Syracuse and its suburban municipalities to enhance moving people by buses from and to homes to work and education centers. I also request that NYSDOT coordinate with the City, the County and Centro to provide transit shelters across the Project area and create transit stops that meet existing Centro thresholds with respect to shelter boarding numbers. Additionally, I request that the State provide design and operational assistance for a Bus Rapid Transit (BRT) system as recommended in the SMTC SMART 1 Study.

Thank you for the opportunity for the opportunity for public response to the DEIS. I look forward to participating in ongoing opportunities for public engagement to ensure that the best possible design for the Community Grid is completed and implemented with minimal negative environmental impacts as quickly as possible.

Sincerely,
Barry E. Lentz
1011 Westcott Street
Syracuse, NY 13210
315-472-5401
lentz.be@gmail.com



To: **Federal Highway Administration (FHWA) and**
New York State Department of Transportation (NYSDOT)
From: **Minch Lewis**
RE **NYSDOT Obligation to issue a Supplemental DEIS**
Date: **October 14, 2021**

The following is being submitted as a comment for the record regarding the I-81 Viaduct Project Draft Design Report (DDR)/Draft Environmental Impact Statement (DEIS).

Purpose: NYSDOT has an obligation to issue a Supplemental DEIS with a new alternative combining the Community Grid and a Harriet Tubman Memorial Freedom Bridge.

Rationale: This conclusion is based on the following:

1. The project was initiated by the NYSDOT to address the fact that the structure of the elevated roadway is approaching the end of its useful life. "The purpose of the 1-81 Viaduct Project is to address structural deficiencies and non-standard highway features while creating an improved transportation corridor through the City of Syracuse that meets the transportation needs and provides the infrastructure to support long-range transportation planning efforts."

Five objectives were established to fulfill the purpose in Section 8.1:

- Address the transportation network structural deficiencies, particularly associated with aging bridge structures and non-standard/non-conforming design features within the project limits along I-81 and I-690.
- Address vehicular, pedestrian, and bicycle geometric and operational deficiencies within the project limits.
- Maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., business districts, hospitals, and institutions) within neighborhoods within and near Downtown Syracuse.
- Maintain or enhance the vehicular, pedestrian, and bicycle connections in the local street network within the project limits in and near Downtown Syracuse to allow for connectivity between neighborhoods, business districts, and other key destinations.
- Maintain access to existing local bus service and enhance transit amenities within the project limits in and near Downtown Syracuse.

2. Corollary goals were expressed in community meetings including but not limited to the following:
   a. to repair some of the damage from the original construction of Interstate 81 over 50 years ago
   b. to promote jobs for the neighborhood residents
   c. to reduce the effects of air pollution from traffic
   d. to remove high-speed through traffic from the city
   e. to create economic opportunity for Black-owned businesses
   f. to make land available for taxable development to support the city
   g. to improve housing conditions.

3. The NYSDOT advanced three alternatives as a result of its environmental review process: the No Build Alternative, the Community Grid Alternative, and the Viaduct Alternative.

4. The NYSDOT identified their preference for the "Boulevard" alternative (later renamed as "Community Grid") as early as 2011 prior to the input from the community.

5. NYSDOT continued to promote the Community Grid Alternative as its preferred alternative without sufficient consideration of the positive benefits of other alternatives and without a complete evaluation of the negative impacts of the Community Grid Alternative.

6. NYSDOT's selection of the Community Grid Alternative as the preferred alternative was skewed by its comparison with the Viaduct Alternative which included a number of features that were not included in the Community Grid Alternative.

7. As a result of the shortcomings of NYSDOT's selection, the community has been deprived of the information needed for a full understanding and informed assessment of the total impact NYSDOT's preferred plan will have on the future of the community.

8. In response, concerned citizens, business leaders, and elected officials have promoted the development of an alternative that would maintain the free flow of traffic to and through the City while also reconnecting the community.

9. To remedy the shortcomings and protect Syracuse neighborhoods, NYSDOT has an obligation to create a new alternative combining the Community Grid Alternative with an elevated roadway. The new alternative could be designated as the Community Grid and Bridge Alternative.

10. Recently, members of the Harriet Tubman family have suggested that the bridge be dedicated to the memory of Harriet Tubman, a heroic abolitionist cited by the National Women's History Museum as a "conductor" of the Underground Railroad. It is fitting that a major transportation facility on the very escape route followed by former slaves be dedicated to their memory and to Harriet Tubman.

Technical Details: The following sections provide documentation for the conclusion that the NYSDOT has an obligation to issue a Supplemental DEIS.

1. <u>The comparison of the Viaduct Alternative with the Community Grid was biased</u>

Many features that were included in the Viaduct Alternative were not in the Community Grid Alternative. These added features increase the cost of the Viaduct compared to the cost of the Community Grid Alternative. The Viaduct Alternative would be providing services and functionality not provided by the Community Grid Alternative, an unfair and biased analysis. Those additional features should be eliminated in comparing the Viaduct and Community Grid Alternatives. The impact could be significant. For instance, the cost of the Viaduct Alternative is estimated at $2.2 billion compared to the cost of the Community Grid at $1.9 billion. The difference in cost is cited by NYSDOT as a factor in its selection of the Community Grid as the preferred alternative. In a supplemental DEIS, NYSDOT should account for the differences in functionality by eliminating the cost of the added features from the Viaduct estimated cost. Such an exercise will result in a significant change in the comparable costs and impacts, especially with regard to the number of properties to be acquired and employees displaced.

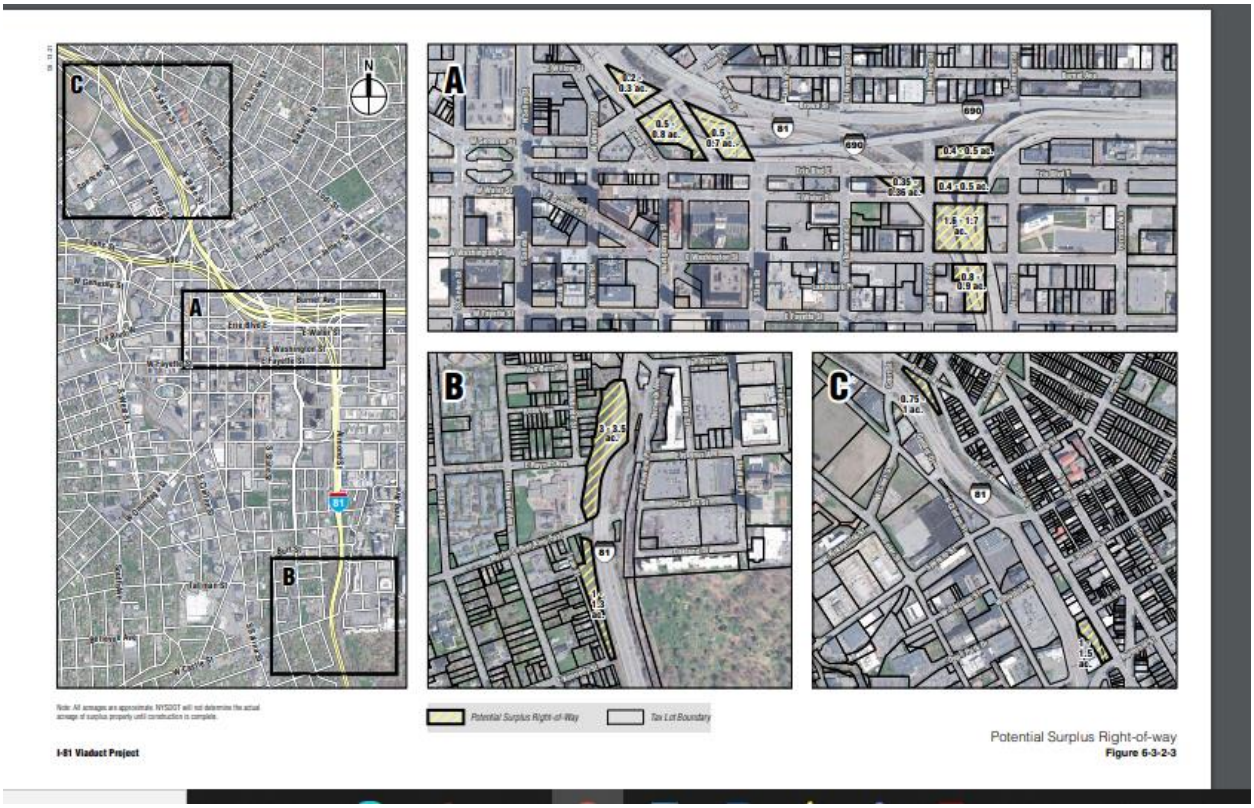
The following features should be removed from the analysis of the Viaduct cost and impact estimates:

A. Reconstruction of I-690 and Existing I-81/I-690 Interchange and Provision of Missing I-81/I-690 Connections. The cost of the new ramps should be eliminated including the connections from:
   - I-81 southbound to I-690 westbound
   - I-690 eastbound to I-81 northbound
   - I-81 northbound to I-690 eastbound replacing the east side ramp with an exit on the west side of the roadway.
B. Costs associated with accommodating a 60-mph speed limit for design purposes, including wider lanes and shoulders and additional land acquisition.
C. Widening I-81 from Interchange 20 to Interchange 24 with four lanes in both directions would not be necessary.

2. <u>The Community Grid Alternative has serious negative consequences:</u>

The Community Grid Alternative does not achieve many of the objectives prioritized by the community:

A. It hurts the neighborhood with an interchange at Dr. King Elementary School or somewhere nearby, diverting thousands of rush-hour cars to city streets.
B. It increases pollution in the neighborhood by creating traffic congestion. Traffic studies that show the Level Of Service to be adequate in the neighborhood ignore the fact that the quality of life for residences is affected by the number of vehicles passing by, not by the amount of time they are delayed at a corner (although congestion time does increase air pollution).
C. It includes more than $800 Million to widen I-481 in the suburbs, creating suburban sprawl. Both NYS law and Onondaga County development policy either discourage or outright prohibit sprawl.
D. It reduces the value of the vacant land in the city, including the Lakefront, by removing an interstate roadway from the City.
E. The full amount of the project budget, $1.9 billion, would be spent on roadways, with no additional economic or social benefit.
F. It would not provide any additional benefits to begin repairing the damage from the original construction because it would merely create an urban boulevard not much different than Townsend Street.
G. Eliminating the I-81 elevated roadway without a replacement will decrease vehicle access to key destinations. Travel to and from the north and south sides of the community will be impacted. For instance, travel from the Valley neighborhood to the Franklin Square neighborhood would effectively be consigned to city streets.
H. There has been no consideration of traffic needs for special events at SU. In fact, SMTC has just initiated a master plan study of traffic in the university hill area. It is a three-year study.
I. The Community Grid Alternative violates existing NYS public policy regarding Smart Growth and the County development policy to prevent urban sprawl.
J. New taxable development for the City would be severely limited by the parcels that would be made available as shown below. They are small, irregular, isolated, and have no demonstrated market potential.



3. <u>The Community Grid fails to meet national objectives of the Biden Administration</u>

On December 23, 2020, Secretary-Designate Pete Buttigeig was interviewed on "Morning Joe." He outlined the Biden administration's five goals for the infrastructure transportation program:

1. Improve the safety of the transportation system
2. Reduce the impact of transportation on climate change
3. Promote economic growth and the creation of new jobs
4. Provide equity in the distribution of transportation resources
5. Address civil rights issues and discrimination in transportation

The preferred Community Grid Alternative fails to achieve all five objectives:

1. **Safety:** Grid reduces safety by diverting thousands of cars daily to residential streets
2. **Climate change:** Grid increases pollution by adding stop-and-go traffic backups
3. **Jobs:** Grid moves jobs for neighborhood residents from businesses along I-81 corridor
4. **Equity:** Grid places burden and negative impact on a Black neighborhood
5. **Civil Rights:** Grid invests in suburban roadways rather than in a Black community in the City and ignores an opportunity to create an iconic monument to Harriet Tubman.

4. The new alternative would combine the Community Grid and an iconic Bridge

The new Community Grid and Bridge Alternative would include many of the features of the Community Grid. The Viaduct Alternative would be modified substantially. The details are below:

A. The existing I-81 elevated roadway would be continued north of Colvin with newly designed structure to reduce the negative impact on the residential neighborhood. It would be relocated away from Dr. King Elementary School as shown in the Viaduct Alternative. It would pass over the railroad and align directly over Almond Street.
B. The exit to Van Buren shown on the Community Grid Alternative would be maintained. An alternative exit direct to parking areas off Raynor would be explored as a more efficient approach taking advantage of the grade levels and avoiding a descent to grade at Raynor and the very steep ascent to destination parking.
C. The cable-stayed structure would begin at Burt Street. Cable-stayed structures are generally straight in-line to accommodate the engineering forces. The ramps at Adams Street should be explored for cable-staying to preserve ground-level clearance underneath them. That exit would provide a connection to Adams eastbound and Harrison westbound, both arterials designed to accommodate traffic. The 30,000 cars predicted for the Community Grid would by-pass the southside neighborhood entirely. The roundabout proposed for the Community Grid Alternative at Martin Luther King East (or Kennedy Street) and the exits at Colvin and Brighton (Glen) would be eliminated.
D. The cable-stayed roadway would continue from Burt to and over Genesee Street, aligning with I-81 from there to the north. It would utilize the existing route to connect with I-81 at the Pearl Street on-ramp as specified in the Community Grid plan. Other than the southbound exit to Almond and Harrison, the interchanges between I-81 and I-690 would be eliminated. This would remove the multiple ramps that add to the width of the existing roadway and to the high rate of accidents. With the elimination of those ramps, it may be possible to reduce the curves and/or improve the sight range. The speed limit would be reduced to enhance safety and meet federal standards for the redesigned I-81 roadway.
E. The current design for the Community Grid Alternative would continue. The “grid” would begin at Martin Luther King East connecting to Renwick Avenue and ultimately to Almond Street. The interchange adjacent to Dr. King Elementary School would be eliminated. Almond Street would be reconstructed as an urban boulevard with narrower streets than would be required for a Business Loop subject to heavy traffic and federal standards. The boulevard would continue north to Erie Boulevard. It would link with I-690 via an extension of the Crouse and Irving diamond interchange planned for the Community Grid.
F. The improvements to I-481 and to I-690 planned to accommodate the diversion of 60,000 cars would be eliminated. Other improvements to the roadways on the eastside would be evaluated as part of a separate project.

5. <u>The Community Grid and Bridge Alternative would meet local and national objectives:</u>

The Community Grid and Bridge Alternative combines the benefits of the Community Grid with improvements that make the Community Grid work better:

A. The Viaduct is removed.
B. A tree-lined boulevard handles local traffic on the surface with pedestrian and bike friendly configurations.
C. An iconic, cable-stayed bridge soars 70 feet over the boulevard to handle non-local traffic.
D. A pedestrian and bike walkway over Almond Street can connect both sides of the boulevard.
E. The interchange at Dr. King Elementary School is eliminated.
F. The existing entrance and exit are maintained at Adams with an exit at Van Buren or Taylor.
G. The bridge is straighter and simpler than the current roadway with a 45-50 mph design speed limit, not the 60-mph planned by NYSDOT.
H. Additional land may be available for development north and east of Dr. King Elementary School.
I. It may be possible to phase construction of the overhead bridge supports to provide for dust-shields to protect the neighborhood and citizens from the pollution resulting from the demolition of the existing viaduct.
J. The $800+ million slated for improvements to I-481 in the suburbs can be spent in the City since no traffic will be diverted. The cost of a cable-stayed roadway is estimated at $600 million; $200 million would be spent for neighborhood improvements, including an LED park to attract visitors from the regional community as well as the immediate neighborhood.
K. Dedicating the bridge and LED park in response to a request from the Harriet Tubman family and committing $200 million to neighborhood improvements can be significant initial steps in recognizing the national transportation goal to promote civil rights.

Conclusion:

In summary:

- The comparison of the Community Grid and the Viaduct was biased and unfair.
- The preferred Community Grid Alternative has many negative consequences.
- The preferred Community Grid fails to achieve national objectives of the Biden Administration.
- A new alternative combining the Community Grid with an iconic bridge should be developed.
- The new alternative would provide community benefits and meet national objectives.

For the above reasons, NYSDOT has an obligation to issue a Supplemental DEIS with an alternative combining the Community Grid with a Bridge Alternative for community review and comment.

Respectfully submitted by:

Minchin G. Lewis
205 Rigi Avenue
Syracuse, NY 13206
Cell: 315-243-2530
Email: Mglewis@syr.edu

DTS TRUCK SERVICE
Aviation Ground Equipment

647 Genant Drive
Syracuse, New York 13204
(315) 422-0464

MARK FRECHETTE – PROJECT DIRECTOR

AUGUST 27, 2021

NYS DEPARTMENT OF TRANSPORTATION – REGION 3

333 EAST WASHINGTON STREET

SYRACUSE, NEW YORK, 13202

Good Morning: Thank you for hosting the informational event at the OnCenter last week.

My name is Richard W. Lindsley, I am the owner of DTS Truck Service Inc, Aviation Ground Equipment, 647 Genant Drive, Syracuse, NY. My property is next to I-81 south bound lane, between Court Street and Catawba Streets. My concern for the I-81 upgrade has to do with the change with North Clinton Street.

I spoke with your design department August 18, 2021 at the ON Center, who informed me that North Clinton Street will be widened and sidewalks will be installed on both sides of North Clinton St between Spencer St and Court Street. Sidewalks are planned to be installed from Court St to Bear street "only" on the West side of N. Clinton St, but "not" on the East side of North Clinton St. I would request that they not be installed behind my property on the east side of N. Clinton St, from Kirkpatrick Street to Court Street.

If sidewalks were installed on both sides of N. Clinton St behind my building it would cause a problem with usable parking space for my customer's trucks, trailers and employees, entering and exiting our yard. Our foot print is small enough now, the addition of sidewalks will hamper our daily operation for our commercial customers, along with our employees parking. If possible please have your representative stop over to view my concerns. Also, I have a concern as to how close the new Clinton Street will impact the rear of my building. When speaking with your staff, they could not tell me how close the upgraded Clinton Street will be to my property, they did not have the drawings for my area. Could you send me the drawings of this area so I know what it may look like?

Attached are photos of the area of my concern on North Clinton Street.

Thank you very much.

Richard W Lindsley

Richard W. Lindsley President

DTS TRUCK SERVICE INC

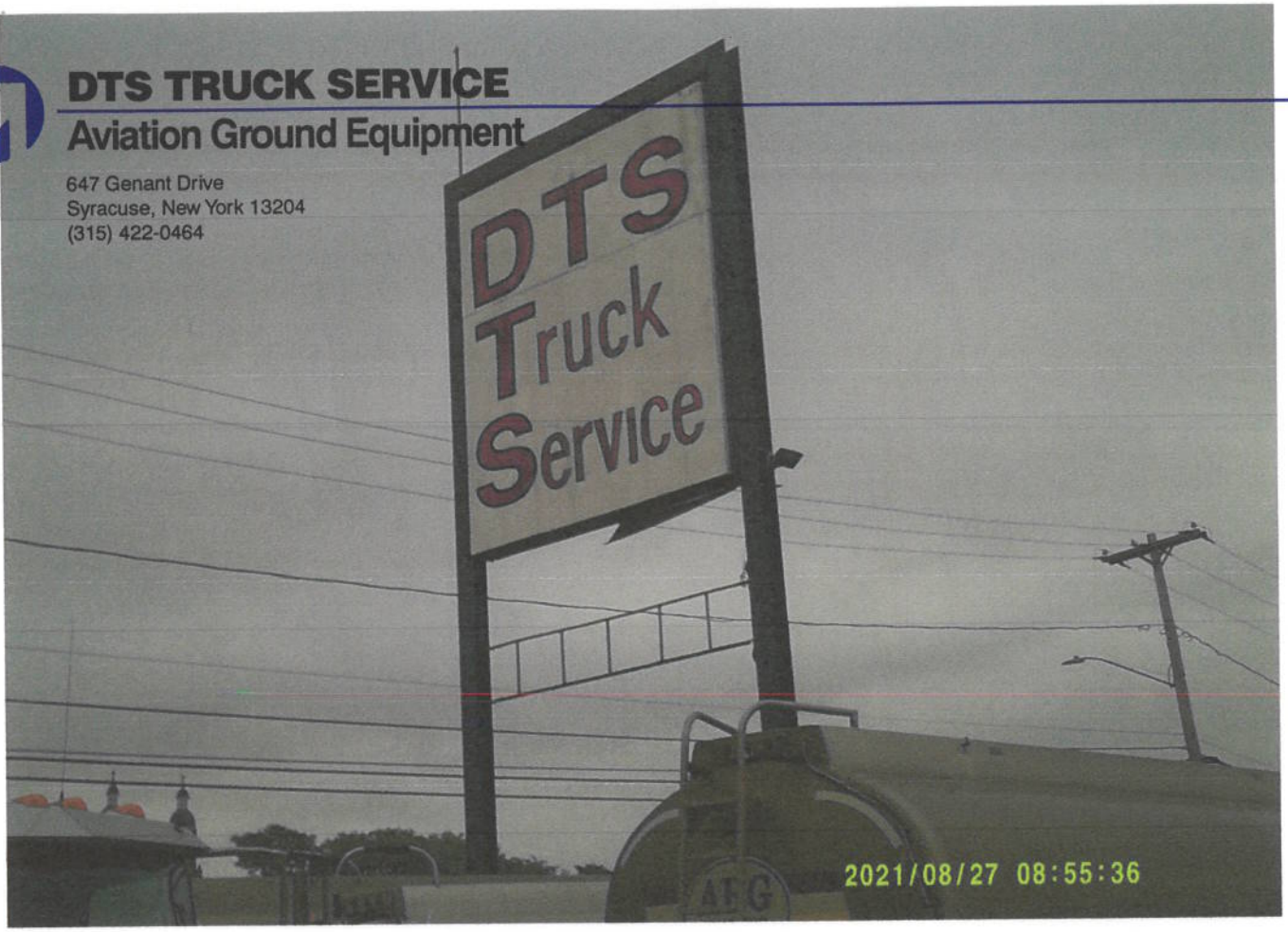
AVIATION GROUND EQUIPMENT

RECEIVED
AUG 30 2021
BY:

DTS TRUCK SERVICE

Aviation Ground Equipment

647 Genant Drive
Syracuse, New York 13204
(315) 422-0464



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Noreen Wray-Roach
Gladys Wrenick
Sui Ling Xu

GENERAL COUNSEL
Daniel J. Ratner

CHIEF FINANCIAL OFFICER &
DIRECTOR OF ADMINISTRATION
Michael Cooperman

1199SEIU
United Healthcare Workers East

RECEIVED
SEP 28 2021
BY:

To Whom It May Concern:

I am writing on behalf of the more than 8000 healthcare workers that 1199SEIU represents in the Central NY region. Of those 8000 members, 1500 live between the east and south sides of the City of Syracuse around the Route 81 viaduct. Also in those 8000 members, we represent 2200 healthcare workers at Crouse Hospital and 1100 members at Loretto Skilled Nursing Facility. Suffice to say our membership will be uniquely impacted by what New York State chooses to do regarding the Route 81 viaduct in Syracuse.

Though we represent a diverse membership that both commute from many suburban communities to Crouse Hospital and Loretto, as well as those that live within the shadow of the viaduct, we as an organization have concluded that we support the community grid solution to the project. We come to this conclusion based on the following criteria:

1) The original creation of the Route 81 viaduct created a segregated community where Syracuse continues to be one of the most segregated communities in the country after more than 50 years after the creation of the viaduct. The outcomes for communities of color have devastated generations of families and have hurt our city both economically and culturally;
2) The environmental effects around the viaduct have produced health outcomes where the asthma rate is eight times higher than the outlaying community. We cannot ignore the fact that the people living around the viaduct has cost this community in terms of health care costs and lost time and talent because of the bad health outcomes that are a direct result of the viaduct;
3) As a community we must focus more on moving people and not moving cars. We must value the community over the individual need to move from one place to another without regard for how it affects others.

As we laid forth these criteria, we request that as New York State listens to the public regarding other effects of the project which include:

1) Once the community grid is chosen, the land that is freed up under the existing viaduct is transferred to a public trust so that the community can best decide how to use the land;
2) The people who will be most effected by the teardown of the viaduct need to be "made whole" both with living conditions and economically. They must be moved to safe locations and remediated for any inconvenience during the deconstruction of the viaduct;

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3) The proposed traffic roundabout near the STEAM at MLK School must be moved. There must also be a program for students to be engaged educationally to learn about the construction industry while the project is ongoing;
4) The majority of jobs should be given to people in the community for the construction and ancillary services for the project. These jobs should be fed through the local union hiring halls and we applaud the efforts of the Pathways to Apprenticeship program. We need to ensure that the program is ongoing to address the lack of economic opportunity for residents of the community;
5) Lastly, there must be investments in transportation that moves people, not cars. The community grid must be more walkable and utilize other modes of transportation than just cars.

We understand the pressures and issues surrounding the viaduct are daunting and there is a lot of "noise" surrounding this project. However, being an organization that has members who represent all sides of this debate, we can say unequivocally that we support the community grid and encourage those at the Department of Transportation to consider our criteria as the project moves forward.

Please let me know if you need any further clarification on our position. We thank you for the opportunity to express the opinion of our membership.

Sincerely,

Kevin Lockhart,

Vice-President, CNY Region for 1199SEIU United Healthcare Workers East

Comments on the I-81 project

Jonathan Link Logan <linkloganjc@gmail.com>

Wed 10/13/2021 5:58 PM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>

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Hello Mark and Rick -

I would like to thank you for all of the work NYSDOT and their design team have done over nearly a decade of work on this import project. It is crucial for the City of Syracuse and all of Central New York to get this decision right, and develop the best alternative possible. I fully support the Community Grid as the preferred alternative. It is the best solution for meeting the needs of a vibrant 21st century community, and is the only solution that addresses the racial and environmental justice issues created by the existing viaduct.

I would offer the following as areas where the community grid needs to be improved to make it a great solution, and be a model example for other communities across the US to look to as they seek to address their aging urban highways.

1. The footprint of the Almond street / BL 81 right of way needs to be reduced to the minimum needed for the sidewalk, road, parking, and bike paths. Currently the plans show the entire existing ROW (~200') filled with these elements and a wide median. This can be reduced to nearly half (~115) and free up approximately 85' to 90' for redevelopment, which will allow the vision ReThink 81 and others have for this corridor becoming a mixed use, vibrant space, to become a reality.
2. Include more generous non-vehicular transportation elements (much wider sidewalks (10-15') in high traffic areas and especially on bridges and underpasses; street furniture – benches, trash receptacles, pedestrian scaled lighting; landscaping and street trees, leading pedestrian interval lights) to create a more balanced transportation system that meets the needs of all.
3. Incorporate transit system enhancements, including supporting the development and operations of the proposed bus rapid transit system in advance of the project so as to provide commuters an alternate means of accessing their jobs in the city during the several years of construction.
4. Address the concerns of the community pertaining to the roundabout at Dr. King School. I believe this feature is the right solution for improving safety and reducing environmental impacts but it may need to be located somewhere else in the BL 81 corridor. If it is moved south, consider locating it where it can also enable the re-opening of the original entrance to the historic Oakwood Cemetery.
5. Install noise barriers in more locations than just those that meet the "feasible and reasonable" criteria, as these structures also provide enhanced quality of life attributes, making it possible of under- and de-valued properties to not be as impacted by the presence of the adjacent highway. I can't help but think that all of the vacant homes and land located along the highway, particularly

on the Southside, would be occupied if these barriers had been installed when the highway was first built. This same mistake should not be repeated again in a project of this scale.

6. Continue to work with various partners to make sure local residents and businesses, particularly those most impacted by the presence of the highway over the last 50 years, are able to get jobs and contracts to work on the project.
7. Adopt a process similar to the one used in Rochester's Inner Loop project to return as much land as possible for redevelopment, and give the power to choose the redevelopment projects to the local community – with a particular emphasis on equity and social justice projects.
8. Install pedestrian activated crossing lights at Monroe and Madison streets to proactively address the issues that were experienced on West Street from occurring on Almond.
9. Develop a "shared services agreement" of some fashion with the city that shares the maintenance costs for the upkeep of the elements installed under the project so the cost of replacement and maintenance is not solely the responsibility of the city, which currently struggles to maintain its infrastructure.

Thank you for your continued efforts to refine the project and make it the best it can be. I look forward to seeing construction start, and the project finished, and encourage NYSDOT to continue to work with the community to improve the project.

Thank you,
Jonathan Link Logan
141 Lilac Street
Syracuse, NY 13208

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Cc:	Doucette, George (DOT); Parmley, Elizabeth (DOT)
Subject:	FW: Loretto & I-81 Initiative
Date:	Tuesday, October 12, 2021 9:17:39 AM
Attachments:	image001.png Loretto Letter for I-81_REV.pdf
Importance:	High

From: Davis, Heather A. <hdavis@lorettosystem.org> **On Behalf Of** Townsend, Kimberly
Sent: Thursday, October 7, 2021 3:42 PM
To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>
Subject: Loretto & I-81 Initiative
Importance: High

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Good afternoon Mark,

As we get closer to formalizing the final plans for the I-81 initiative, I would like the opportunity to have a productive conversation with the Department of Transportation about several critical impacts to the Loretto campus that we need to address to ensure the continued safety and security of our residents, staff and families who access our campus daily. In the attached letter, I address a few key areas of concern, and submit some recommendations for addressing for your consideration. Please advise on a time and date when we can meet to discuss further. I look forward to your support and collaboration.

Thank you,

Dr. Kimberly Townsend
President and Chief Executive Officer
Loretto
700 E. Brighton Ave. Syracuse, NY 13205
Telephone (315) 413-3927
Mobile (315) 481- 1312
www.lorettocny.org

Loretto
Exceptional People. Extraordinary Care.

Our Mission: To be a family of exceptional people caring for and about each other.

****
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Loretto
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September 29, 2021

Mark Frechette, P.E.
Department of Transportation, Region 3
333 E. Washington Street
Syracuse, NY 13202
Mark.frechette@dot.ny.gov

Re: Loretto Campus – I-81

Mark:

You may recall meeting with us, City Water officials, EDR, and our consultants Pemco Group back in late 2019 to discuss the possibility of adding a second source of water from Seneca Turnpike. At that time, we also touched on the **I-81 project** and agreed to coordinate with you and others at DOT to develop a plan for Loretto's City campus. The purpose of this letter is to outline Loretto's concerns about the I-81 project and to share our plan to mitigate potential impacts at this location.

Loretto: I-81 Project Comments

Loretto's main campus is situated within the City's Planned Institutional District. The campus receives approximately **1,000 vehicles per day** including medical transport, Centro Bus, delivery, shift employee, and visitor traffic. The latest plan for rebuilding I-81 will reconfigure the connections between I-481 & I-81, adding on and off ramps at Loretto's main entrance. A second set of ramps to and from Brighton Avenue will also funnel traffic directly onto Loretto's property. While providing rapid and convenient access to the campus, the convergence of these access points at Loretto's front door will also isolate the campus, potentially causing decreased access for staff as well as emergency vehicles which are on campus daily, due to unwanted and heavy cut-through traffic onto private property, through Fillmore Avenue and S. Salina Street, as evidenced by the projected increases in traffic of up to 7,500 vehicles daily that might rely on this new exit point. *

Also, under this plan, the current bridge on E. Glen Avenue, will be removed and replaced by a new bridge. Because Loretto's only water supply is routed under the existing bridge, removal will require careful consideration and planning. Further, the extensive work planned at Loretto's entrance will disrupt campus operations during construction and will profoundly change traffic patterns at this location over the long term. Our concerns generally relate to:

1. **Campus Accessibility** - The plan must provide reliable, uninterrupted an exclusive access during construction and beyond for Loretto employees (including shift workers), medical transport, buses, police & fire, and service providers.

2. **Public Utility Services** – The plan must ensure adequate and uninterrupted water supply during construction and beyond. Loretto's water supply deficiencies have been well documented and shared with City Water officials. In 2019, Loretto met with the City and NYS DOT with a plan to add a second source of water to the campus from Seneca Turnpike along the State ROW. In 2021, engineers hired by Loretto completed a campus water study that identified minimum water flow and water pressure requirements for the campus.

*REF: SMTC Travel Demand Model Version 3.023 Documentation
http://www.thei81challenge.org/cm/ResourceFiles/resources/SMTC%20Model%20Version%203.023%20Documentation.pdf

3. **Campus Safety & Security** - As currently configured, the plan will increase traffic volume through the campus. Also, unintended entry will likely create driver confusion and a need to turnaround and exit abruptly. Also, the community will quickly realize the ease upon which it can access I-81 & Brighton by cutting through the Loretto campus via Fillmore Ave. To mitigate safety concerns, the plan must provide exclusive access to Loretto traffic, a security checkpoint, and convenient egress for those who unintentionally enter the campus.

Loretto has developed a plan to address each of these concerns. As shown on the attached drawing, Loretto's plan would remove the cut-through to Fillmore Ave., improve campus circulation, add security and signage, reconfigure parking, and relocate the water supply. Additionally, Loretto's plan also provides for a second source of water from Seneca Turnpike (not shown on the attached). This will service the campus during construction and provide a sustainable water supply over the long run.

Construction will require planning and close coordination to ensure that there are no disruptions to phone, utilities, or data services. Plans must provide emergency contingency plans in the event that any lines are cut or taken offline. Elements of Loretto's plan, as further described on the attached drawing, are summarized below:

1. New access gate and employee entrance at Fillmore Avenue
2. New access drive along the western boundary to employee parking areas
3. New drive circle to improve circulation and maneuverability for buses and emergency vehicles
4. New security booth and security cameras
5. New lighted signage to orient drivers as they enter the campus
6. Add a second drive lane at the main entry to limit traffic congestion during shift changes
7. New 10-inch water feed from Brighton Ave., bring the 10-inch across the bridge to a new meter pit with full flow 8-inch or 10-inch fire meter.
8. Relocate the Heritage Building water meter to the new meter pit
9. Create an easement to the new water meter for City Water Department access
10. Add conduit(s) on the bridge for future services such as fiber-optics, phone / Data, etc.
11. Connect a walkway from Brighton Ave to the campus for pedestrian and bike traffic
12. Add sound & pollution barriers to protect the campus during construction and over the long run.

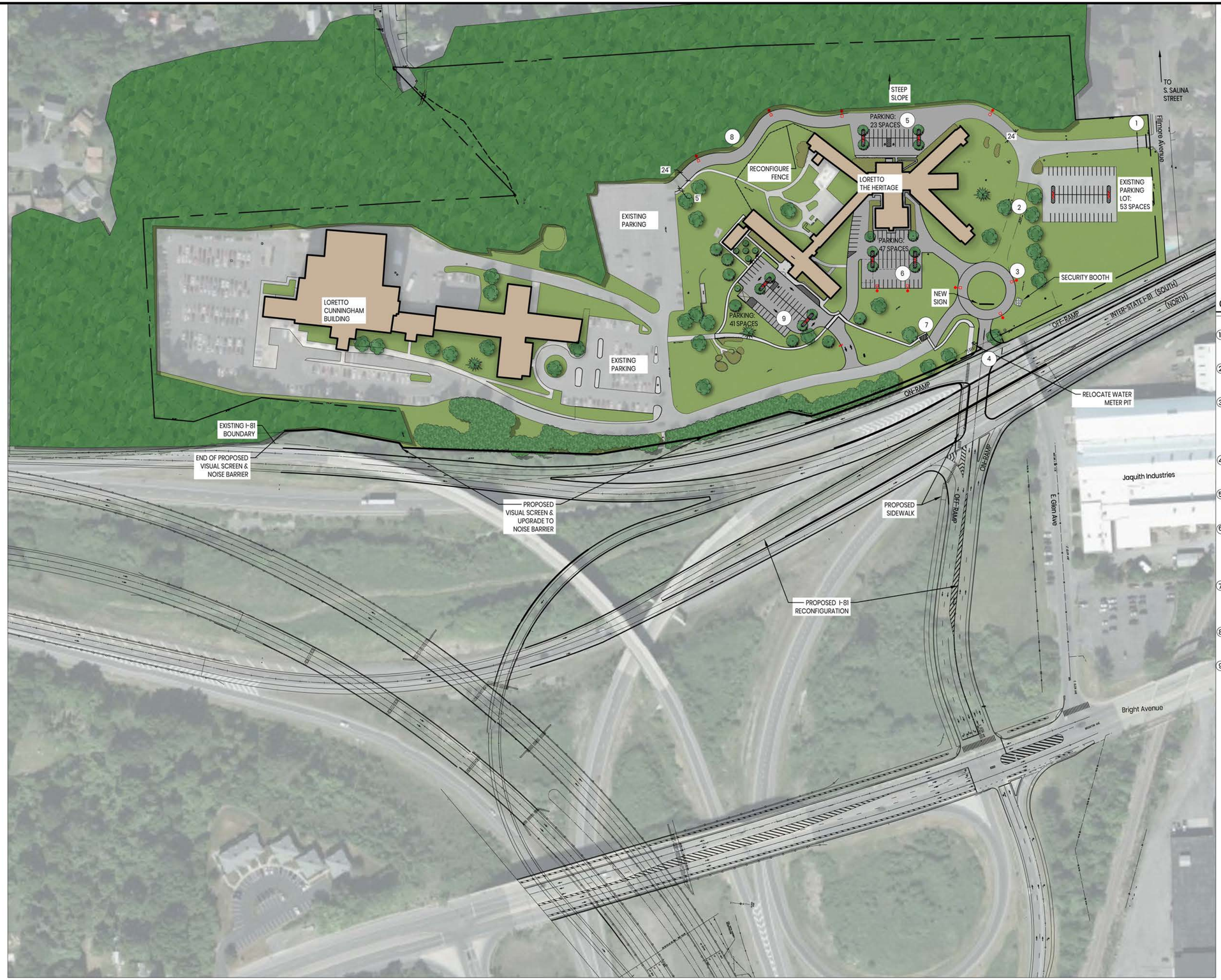
We would like to schedule a meeting to discuss Loretto's concerns and proposed plan. Thank you for your consideration.

Sincerely,

Dr. Kimberly Townsend, President & CEO

*REF: SMTC Travel Demand Model Version 3.023 Documentation
http://www.thei81challenge.org/cm/ResourceFiles/resources/SMTC%20Model%20Version%203.023%20Documentation.pdf

PLOT DATE: 9/21/2021 3:32 PM



LEGEND

- EXISTING TREE
- EXISTING EVERGREEN TREE
- PROPOSED TREES
- PROPOSED SHRUBS
- EXISTING HEAVY VEGETATION
- PROPERTY LINE
- PROPOSED LIGHTS
- PROPOSED SECURITY BOOTH
- PROPOSED BUS STOP
- PROPOSED VISUAL SCREEN
- EXISTING I-81 BOUNDARY
- DUMPSTER SITE

CAMPUS IMPROVEMENTS:

1. NEW GATE TO ELIMINATE LOCAL CUT THROUGH TRAFFIC AND ALLOW FOR EMPLOYEE ONLY ENTRANCE.
2. DEMOLISH SECTION OF ROAD TO ELIMINATE LOCAL TRAFFIC CUTTING THROUGH CAMPUS TRAFFIC.
3. REMOVE EXISTING MULTI-DRIVE & REPLACE W/NEW DRIVE CIRCLE TO IMPROVE CAMPUS CIRCULATION, FIRE & EMERGENCY VEHICLE MANEUVERABILITY W/ A NEW SECURITY BOOTH. NEW CAMPUS ENTRANCE SIGN.
4. EXISTING BRIDGE PROPOSED TO BE REMOVED & EXISTING UTILITIES TO BE RELOCATED NEW BRIDGE.
5. RECONFIGURE PARKING FOR NEW ROAD, ADD LANDSCAPING AND WALKS.
6. DEMOLISH EXISTING GARAGE BUILDING & BUILD NEW PARKING LOT, ADD SIDEWALK AND LANDSCAPING TO BUILDING ENTRANCES. ADD PARKING LIGHT/ SECURITY LIGHT.
7. PROPOSED RELOCATION OF BUS STOP: ADD PAVING SIDEWALK TO CONNECT FROM NEW BRIDGE TO BUS STOP & CUNNINGHAM BUILDING.
8. NEW ACCESS DRIVE TO CUNNINGHAM BUILDING. CLEAN WOODS FOR 20' TO OPEN VIEW & ALLOW FOR ROAD.
9. EXPAND EXISTING PAVED AREA TO INCREASE PARKING LOT.

GRAPHIC SCALE: 0' 50' 100' 200'

Terry Horst LANDSCAPE ARCHITECTURE, PC
PHONE: 315-472-2461
WWW.THORSTLANDSCAPEARCH.COM
306 HAWLEY AVENUE, SYRACUSE, NEW YORK

LORETTO I-81

Loretto Drive & Glen Ave
Syracuse, NY 13205

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SCALE: 1" = 100'-0"

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DATE:

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DRAWING: SITE PLAN

DRAWING # L•1.1

Y:\CURRENT-PROJ\3492 Loretto I81\Drawings\3492_LORETTO-I81_SCHEM_WORKING5.dwg

V. James Magnarelli

Deputy Supervisor

Town of Salina

To Our NYS Representatives:

I am writing over my concern of the selection of the Grid Option to replace the I81 viaduct.

The decision to remove the viaduct and reroute thru traffic to 481 from Clay to Nedrow is being made with little to no consideration of the impacts this will have on Northern Towns.

Many businesses (hotels, restaurants, truck stops) have grown in proximity to the I81 and I90 ramps taking advantage of the traffic patterns in that locale. The Seventh North Street corridor, which is in my home District, has 11 hotels 4 filling stations and multiple eating places (McDonalds, Tully's, Burger King, Denny's, Subway, Dunkin Donuts, KFC, Little Ceasars) all within a mile and a quarter stretch.

Studies performed by these businesses all show that the rerouting of traffic around the City of Syracuse would cause approximately a 30% decrease to revenues. The only option business owners have to could mitigate this loss is by reducing staff and laying off workers.

To date I have heard of no State Representative who has reached out to these business owners with a workable solution to this loss of commerce.

The reduction of property assessments to these businesses due to revenue loss will have to be picked up by residents in the way of higher tax rates.

I sincerely implore those who are making this critical decision for the residents of Central New York, to delay the final determination until all concerns are weighed equally and those entities which are negatively impacted have a mitigation plan to save businesses and jobs.

Thank you for listening.

V. James Magnarelli

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Liverpool NY 13088

315 439 4114

VJMAGS@GMAIL.COM

WILLIAM B. MAGNARELLI
Assemblyman 129th District

THE ASSEMBLY
STATE OF NEW YORK
ALBANY

CHAIR
Committee on Transportation

COMMITTEES
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Education
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Steering
Ways and Means

August 24, 2021

Mr. Mark Frechette, P.E.
Project Director, NYS Department of Transportation
Region 3
333 East Washington St
Syracuse, NY 13202

Dear Project Director Frechette,

I hereby submit the following as part of the record of the public comment period for the I-81 Project Draft Environmental Impact Statement (DEIS). For some 60 years, I-81 has served as a major thoroughfare and economic driver for the entire Central New York Region continuing and reinforcing Syracuse's historical identity as the "Hub of New York."

Eight years ago, on July 7, 2013, I attended the first official regional meeting of "electeds" held by then NYS Department of Transportation Commissioner Joan McDonald to discuss the deteriorating condition of I-81. Commissioner McDonald made it clear to the assembled group of mayors, legislators and town supervisors: the region "must come to a consensus" about how to replace I-81. That has not happened.

While advocates for removing I-81 from the City have been the most vocal, they in fact represent only one of the perspectives I have heard from the greater regional community. Although much has been said, rightfully, about the racial injustices that occurred due to the original I-81 project, we must also keep in mind the mission we were originally tasked with – local/state/national transportation needs. And, although we were originally told not to focus on the cost of the new project, cost has been used to redirect the debate away from the more consensus building alternatives.

I have concerns that the DEIS did not adequately address some of the most important questions related to this significant regional project.

- While a handful of U.S. cities have removed sections of highways in their urban cores, these were auxiliary spurs off of a larger traffic (Tier One Federal Highway) artery. Why should I-81 in Syracuse be the first Tier One Federal Highway in the United States to be decommissioned? It has served as a north-south conduit for people and goods for decades. It is part of what makes Syracuse the "Hub of New York."

- Today, much of the project area consists of public housing managed by the Syracuse Housing Authority. Some of the housing is only feet from the viaduct. The DEIS offers no information regarding new housing, and maybe it "technically" need not. NYSDOT has

- stated it will not "force" people from their present housing. However, where are those who choose not to live in a construction site going to be relocated? What new housing is going to be constructed and where? How will the NYSDOT prevent gentrification of this area and prevent future racial injustices? And if tenants are not going to be relocated, how will the City/State mitigate the impacts of construction?

- The SPECTRA Report, authored in 2019 by former NYSDOT Chief Engineer John Shafer, found that 61 intersections in the City of Syracuse would have a Level of Service (LOS) of E (severe congestion) or F (failure) during peak rush-hour periods. How can NYSDOT be dismissive of this report when it was authored by a former DOT engineer? Although the DOT has made changes to the community grid plan, data used has been questioned by some and many feel the problems described in the SPECTRA Report were not fully addressed.

- According to the DEIS, hotels in the Town of Salina will lose approximately 1.3% of their annual bookings, and Destiny USA will lose about 2.8% of shoppers. If the grid alone should be implemented, traffic coming from the north and south would be directed around the City to the east, in the opposite direction of Destiny USA and hotels in Salina. Wouldn't one expect these two figures to be much higher, particularly for the hotels who rely on interstate traffic? And why would we divert traffic away from one of the major attractions of Central New York?

- The DEIS shows that a roundabout will be constructed at the intersection of Business Loop 81 and Martin Luther King East, at the point in which the highway comes down to street level. This is immediately adjacent to Dr. King Elementary School. Many have questioned if the roundabout is too close to the school and endangers the safety of children.

This opportunity should not be squandered. We can have connectivity within the City, including walking and bike trails, and continue to keep the City connected to its suburbs and the rest of the region. These are not mutually exclusive. I have never been against the community grid idea itself. What we need is a community grid in conjunction with a rebuilt viaduct, tunnel or new bridge to keep traffic flowing through Syracuse.

Further, I do not believe that a consensus for this project has ever been reached by the City, suburbs, and outlying towns in our region. Given the amount of federal monies available, why don't we have an option that satisfies everyone's needs? I believe that Central New York requires and deserves more.

I would like to thank the NYSDOT for its time, efforts and professionalism during this EIS process. I stand ready, as a member of the New York State Assembly and as Chair of its Transportation Committee, to do whatever I can to facilitate the project that is finally selected. It is critical that the adverse impacts of construction – housing, traffic, noise, environmental pollution – are mitigated and that local workers and businesses benefit from this billion dollar plus investment. However, the majority of my constituents and I hope NYSDOT will select an option that works best for and represents the views of the entire Central New York Region.

Respectfully,

William B. Magnarelli
Member, NYS Assembly
129th District

WBM/dep

RECEIVED
AUG 31 2021
BY:

August 19, 2021

Mark Frechette P.E. Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, New York, 13202

Re: I-81 Viaduct Project Draft Environmental Impact Statement

Dear Mr. Frechette,

We are hoping that the unintended consequences of the I 81 Community Grid Alternative will not overshadow the positive impact for the Syracuse community.

Has the state considered the impact of increased traffic flow in communities to the west of Syracuse during and after the project construction? There are many safety and environmental risks in directing long-haul global shipping and garbage trucks in huge numbers onto roads designed for local traffic which run on both sides of each of the finger lakes. Inhabitants of this lake country are seriously concerned and hoping state level visionaries are seeing this and planning for solutions.

Sincerely,
Margaret + John Manning

margaretmanning@gmail.com

dupli

RECEIVED
SEP 20 2021
BY:

September 14, 2021

Mr. Mark Frechette, P.E.
NYS DOT Region 3
333 East Washington Street
Syracuse, NY 13202

Dear Sir,

I am writing to support the bridge concept as an exciting way to correct Route 81.

The proposed community grid, while correcting the deficiencies of the current Rout 81 will create some problems for the 481 traffic and some exit problems. Further adding miles and time for through traffic.

I am normally interested in the cost of alternatives, however, in the current environment what's an additional 400 million dollars to give Syracuse an exciting look for the future.

Sincerely,

J. Kemper Matt
Chairman

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2533 Yellow Springs Road, Malvern, PA 19355 • 610 644 4188 • 800 726 7599 • fax 610 644 0628
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District Office
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Room 805
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Syracuse, New York 13202
(315) 478-8745
may@nysenate.gov

October 13, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Dear Mr. Frechette,

Let me begin with my gratitude to the planning team that has worked for so many long years to make this project a reality and made heroic efforts to collect and respond to public input and to inform the public about the details of the various proposals. As we approach the end of a roughly decade-long discussion, I am very eager to see the plans finalized and to continue the work of building a better city and region. Before we get to that point, I would like to make a series of comments meant to improve the final plan. I believe that the community grid is by far the best solution, and given that this argument has been made many many times, I will use this opportunity to comment to suggest improvements to the community grid plan as it currently exists rather than repeat old arguments of which option is the best.

Before detailing specific changes to the plan, let me begin with an overarching comment: the main conceptual priority of the project must be to improve the lives of people who currently live in close proximity to the viaduct. The building of the original viaduct was a tragic mistake, and the communities along its path have had to live with the consequences ever since. This includes disinvestment, both in lost property values, neglect of existing properties, and lack of investment in new buildings, broken connectivity between those neighborhoods and the rest of the city and region, economic and racial segregation, and environmental and health impacts from vehicle exhaust and noise close to residential neighborhoods, schools, and businesses. We should always bear in mind that the people who have borne these burdens are least likely of anyone in the region to have benefited from the current configuration of I-81, since a large proportion do not own cars.

I believe if that perspective is kept paramount in all planning decisions made by the DOT team, improving the details of this project will naturally follow. The current plan is a drastic improvement from what currently exists in Syracuse, but we can do more to fine tune the particulars and deliver a better outcome.

-The road designated in the plan as BL-81/Almond St. should be designed more in line with urban use rather than as a high speed road designed to carry vehicles as fast as possible. While the bike lanes and tree lined median are good ideas and should be kept, the lane width could be significantly narrowed to slow traffic. Slower traffic will encourage more pedestrian and bike usage, and shorter distances for crossing Almond St.

will encourage more east-west walking and biking. Narrowing Almond St. also frees up additional land for development and public space. For too long, high-speed vehicular traffic has dictated land use in a wide swath at the center of our city; it is time to give that land back to human-scale, urban uses.

-There has been a lot of discussion of the roundabout at the Dr. King school, and I am very encouraged and thank you all for indicating your willingness to reconsider this part of the plan. I certainly understand the desire for a roundabout to slow traffic at the point that the highway first links to the city grid. However, it is apparent that residents of the neighborhood are concerned that the location of the roundabout will increase traffic close to the school both on the 81-BL and on Dr. Martin Luther King East. Not only is there a danger to students walking near the school, but there is also well documented harm to students' health by placing a major roadway close to a school. We should be looking at all options to both increase the distance of the road and divert the number of cars away from the school.

Accordingly, residents of the neighborhood should be given several options of how and where to bring the highway to grade, and a collaborative process should follow to create a solution. This could include moving the roundabout further south to the Kennedy, Colvin, or Brighton interchanges. In addition, no matter the option, the DOT should build into the budget of the project further remediation for the STEAM at MLK school, including top of the line HVAC systems and changes to the outdoor landscape to mitigate the effects of pollution from cars.

In this context, I strongly support moving the roundabout far enough south to allow reopening of the original grand entrance to Oakwood Cemetery. The cemetery is a historical and natural gem. It contains 1/7 of all tree cover for the city and was the primary green space for the South Side before the interstate was constructed. Lack of tree cover and green space is an environmental justice issue, especially in our warming climate, since we know that low-income and minority neighborhoods have less relief from heat waves and are more likely to suffer adverse impacts as a result. Furthermore, many residents of the neighborhood closest to the cemetery have loved ones buried there yet struggle to access the cemetery if they do not have a car. I understand that the current operators of the cemetery are not in support of opening the gate at the current time, but this should be viewed as a priority for those of us in government because of the social and historical value of the cemetery and its benefit to the broader public. By creating a design that at least allows for future access to this site, I believe we would be best serving the public's interest.

-I support the creation of the land use working group as described in the DEIS. I understand the final decision is out of the purview of DOT, but I would like to use this opportunity to state on the record my support for the idea discussed by the New York Civil Liberties Union and various other community groups. The land trust should be designed to best maximize democratic decision-making processes on land use and assisting people in owning their homes while preserving future affordability.

-I support the Urban Jobs Task Force's efforts, asks, and strategies to increase local hiring to the greatest amount possible. The investment this infrastructure project brings can be transformational for the city of Syracuse if we get it right, and that includes using this opportunity to provide high quality jobs and construction skills for a career for residents in a neighborhood that has historically seen high levels of disinvestment and economic exclusion.

-I believe the DOT should pursue all available options to improve our mass transportation systems as part of this project. Particularly, funding for the Bus Rapid Transit system as laid out in the Syracuse Metropolitan Transportation Council's February 2018 SMART1 study should be pursued as a-ready-to-implement idea that will contribute to the project's goals of building a balanced transportation system with many options for residents to get around the region. In addition to improving quality of life in the city overall, I believe better

mass transit options during the construction phase will help mitigate traffic impacts while allowing more local workers access to the job sites.

-I appreciate the thought and planning that went into ensuring no resident is permanently relocated. I am also confident that your construction teams will put in the utmost effort to limit the amount of disruption to the lives of residents near the viaduct. However, with such a large project, there is fear from many that the noise and environmental impacts of the construction will be difficult to live with for those closest to the viaduct.

I urge that the DOT pro-actively set up a process and set aside funding to assist residents who would like to voluntarily temporarily relocate if the effects of construction disrupts their daily life or causes adverse health impacts. By setting up and communicating the process in advance, and emphasizing that it is strictly voluntary and only a temporary measure, I believe you will help alleviate a lot of the anxiety and questions that residents living close to the viaduct currently have.

-As a cyclist, I also have an interest in making sure the whole project is contributing, wherever possible, to pedestrian and bicycle safety. I recently watched someone ride a bike eastward on 5/92 across I-481 in DeWitt. It was terrifying. I understand that the new configuration of that interchange with the new I-81 will include traffic lights rather than a simple cloverleaf. Please be aware that people do try to get across that span by means other than cars, and do what you can to make it as safe as possible.

-In addition to representing most of the current I-81 corridor through the city, I also represent Salina, Cicero, Lafayette, and Tully. I have studied carefully the estimated drive times and do believe that the new project, once completed, will not cause serious delays to drivers from those communities. I also believe it will improve access to Destiny Mall from the south. But I have also heard, as you have, the concerns of business owners at the northern and southern ends of the project. I want to urge DOT to use signage along the new I-81 route to direct travelers to hotels, gas stations, restaurants, and other amenities within those communities, the same way this is done elsewhere on I-81 and other interstates.

Sincerely,

Senator Rachel May, New York's 53rd Senate District

Joe McCARTHY
904 WILLIS AVE
SYRACUSE, NY 13204-1630

SYRACUSE NY 130
13 AUG 2021
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AUG 19 2021
BY

I 81 Viaduct Project
NYS DOT
333 East Wash. St.
Syracuse NY 13202

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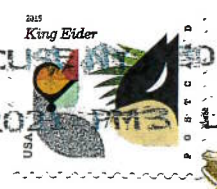
Please repair and keep the current viaduct, I am not in favor of the community grid

Repair I 81 Peace

Joe McCarthy (315) 468-3433

MARY MCCARTHY
904 WILLIS AVE
SYRACUSE, NY 13204-1630

SYRACUSE NY 130
13 AUG 2021 PM3 L



RECEIVED
AUG 1[illegible] 2021
BY:

I81 VIADUCT PROJECT
NYS DOT 1
333 EAST WASH. ST.
SYR NY 13202

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PLEASE REPAIR AND KEEP THE CURRENT VIADUCT. I AM NOT IN FAVOR OF THE COMMUNITY GRID.

PLEASE REPAIR I81 - PEACE -

MARY MCCARTAY (315) 468-3433

mcvlaw

RECEIVED
AUG 26 2021
BY:

313 E. Willow Street, Suite 201
Syracuse, New York 13203

Telephone: 315-471-1664
Facsimile: 315-471-7882
www.mcvlaw.com

August 24, 2021

Mark Frechette, P.E., Project Director
New York State Department of Transportation
Region 3
333 East Washington Street
Syracuse, New York 13202

Re: Property at 935 Erie Blvd East, Syracuse, New York.

Mr. Frechette,

Please be advised that I have been consulted and retained by C.A.S. Industries, Inc., with respect to the proposed partial acquisition of C.A.S. Industries, Inc. property at 935 Erie Boulevard East, Syracuse, New York.

My client and I attended the public hearing on Wednesday, August 18, 2021, and met with a number of officials of the Department of Transportation and were able to review the proposed I-81 project.

With respect to my client's particular issue is that the proposed on and off ramp of 690 at South Crouse Avenue would require taking of my clients parking lot as the proposed plan is currently formulated.

The loss of that portion of 935 Erie Boulevard East will not only eliminate customer parking, make the present entrance unusable but would also restrict the ability for the business to receive and ship products since currently that is implemented with full size tractor trailers, 53 feet in length.

We were advised at the public hearing that a representative of the Department of transportation would be willing to visit the site personally and identify in more detail exactly where the construction would occur.

Under the circumstances, we look forward to having one or more representatives of the department of Transportation make arrangements to visit the site and lese feel free to contact me at 315-427-2188 to make those arrangements or you may contact the owner, Donald Cohn, at 315-436-1993.

In the interim, please accept this letter as our objection to the plan as it is currently drafted for the reasons set forth above.

Your prompt attention in this matter will be greatly appreciated.

Very truly yours,

James A. Meggesto, Esq.

JAM/pvw

RECEIVED
OCT 15 2021
BY: postmarked 10/14/21

Mr. William J. Michaels
3952 W Seneca Tpke
Syracuse, NY 13215

10/14/21

Dear Mr. Frechette,

I strongly believe in keeping RT 81 as an elevated highway thru Syracuse. So do a large majority of people I come in contact with.

Many of us think that because we are not "letter writers, advocates etc we are not being heard. I hear comments like "everyone laughed out loud" when the destruction of the viaduct was first proposed. I feel that the media area leaders etc are pushing a bad idea on our CNY transportation system.

I propose that someone in authority hire someone to conduct a poll to guage the real sentiment of everyday people in Syracuse the suburbs and surrounding communities on this important question.

I believe having an Erie Blvd thru downtown Syracuse would be a disaster. Has anyone looked at the effect of many more traffic lights with advanced left turn signals will have on traffic flow.

Thanks for your consideration

William J. Michaels

Sunday
October 3, 2021

Dear NYSDOT,

I want to thank you for the very colorful charts, of the Rt. 81 project. I live just outside, of the village of Liverpool. My concern is getting to the hospitals, in a timely manner. We used those emergency rooms, 5 times over our 40 years, we've lived here. Right now it takes about 15 minutes to do so.

To get to Upstate, there are 3 traffic lights, after exiting Rt 81. Crouse 4 lights. The V.A. 5 or 6 lights. The community grid, appears to be more lights.

The idea of taking Rt. 690 E, seems odd. I really don't like exiting Rt 81 onto 690 E. It puts anyone right onto the left. Trying to get over 2 or 3 lanes, to get off at Teall, is a real test, of anyone nerves. If a new exit were made, to access the hospitals seems absurd.

We have relatives in eastern Maryland. Around Wilmeton, Delaware, I noticed the overpasses, have covered bottoms. Also the Chestapeck Bridge, is constantly being painted, weather permitting. Could spray paint be applied to undercoat bridges every

few years?

I'm sure you relize, that using using Rt 481, is not useful to us. Truckers, coming up from the south, might try to avoid, the community grid. What does Dewitt think of that? Going west might mean, going through Skaneateles and Auburn. Maybe not, since Rt 20 is so hilly. Then they might take Rt 481 and backtrack going west. More traffic for Dewitt.

So please ponder all options carefully. Thank you.

Sincerly,
Carolyn Misener

Carolyn Misener
120 Memphis St,
Liverpool, NY 13088

RECEIVED
OCT - 5 2021
BY:

Neighbors of the Onondaga Nation
2013 E. Genesee Street
Syracuse, NY 13210

14 October 2021

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

RE: Comments on the I-81 Viaduct Project Draft Design Report (DDR)/Draft Environmental Impact Statement (DEIS)

Dear Mr. Marquis,

Neighbors of Onondaga Nation is a grassroots organization of Central New Yorkers that recognizes and supports the sovereign rights of the traditional government of the Onondaga Nation. Upholding our side of the Two Row Wampum Treaty and Silver Covenant Chain, we submit these comments in the spirit of promoting environmental healing and restoring respectful relationships between the governments of our respective Nations.

More than 50 years ago, Interstate 81 ripped through a working-class Black neighborhood in Syracuse. It displaced long-time residents and ensured that poverty, pollution, and a lack of resources would hurt the community that lived in the highway's shadow that persists today.

Construction of I-81 also took land from the Onondaga Nation, dividing their territory and community and perpetuating a shameful history of land theft from Indigenous Peoples by the U.S. Government.

We agree with the New York State Department of Transportation's current preferred option to remove the 1.4 mile stretch of the viaduct and replace it with a street-level grid. Removing the viaduct is a great first step toward racial justice. However, we need to continue to advocate for environmental, racial, and economic justice to ensure the fair and equitable treatment of community members who live in the shadow of the viaduct, and ensure that Onondaga Nation Cultural Resource Monitors are used whenever ground disturbance is expected, to ensure proper care of cultural resources and ancestral remains.

Respect the Rights and Requests of the Onondaga Nation

In 1794, the U.S. Federal Government made a treaty with the Six Nations, including the Onondaga Nation, known as the Treaty of Canandaigua. In this treaty, which is still in effect today, the U.S. Federal Government affirmed the Onondaga Nation's exclusive right to a nine-mile square area south of Onondaga Lake and their continued rights to fish, hunt, gather, and engage in other traditional uses throughout their entire indigenous territory. The vast majority of the I-81 project area falls within the exclusive treaty- protected territory and the remainder lies within the Nation's traditional indigenous territory.

The United Nations Declaration on the Rights of Indigenous Peoples recognizes in Article 32 that "States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources."

In Article 12, the Declaration states "Indigenous peoples have the right to manifest, practise, develop and teach their spiritual and religious traditions, customs and ceremonies; the right to maintain, protect, and have access in privacy to their religious and cultural sites; the right to the use and control of their ceremonial objects; and the right to the repatriation of their human remains."

In 2010 President Obama stated the United States' recognition and support for the Declaration on the Rights of Indigenous Peoples.

We state these facts to emphasize the importance of full consultation with the Onondaga Nation and honoring their reasonable requests with regard to the I-81 project. The Phase 1A and 1B Archeological Reports recognize that the potential exists in this project for the disturbance of Haudenosaunee archeological sites.

The Onondaga Nation repeatedly requested in the official correspondence included in this EIS that proper respect and protocols be used to ensure that ancestral remains are not disturbed in the construction of the project. We ask that the Federal Highway Administration, New York State Department of Transportation and the State Historic Preservation Office fully adopt the recommendations of the Onondaga Nation, including but not limited to:

- Hiring multiple Cultural Resource Monitors from and trained by the Onondaga Nation to be present at all ground disturbing activities
- Using the proper terms to refer to the Onondaga Nation, its territory, and its people.
- To stop work and notify the Onondaga Nation promptly upon the discovery of any human remains. This practice ensures that, if the remains are Haudenosaunee, proper protocols are followed throughout the investigation process.

Heal Historic Harm

We also write in support of the comments submitted by the New York Civil Liberties Union, noting that the permanent removal of the viaduct could improve housing conditions, health outcomes, and economic and educational opportunities for all people in Syracuse. In order to do that, the NYSDOT should consider the following recommendations in its Environmental Impact Statement which will guide the construction project moving forward:

Protect Land Use

- A land transfer policy must be put in place before returning the land to the City of Syracuse that restores and enhances communities impacted by I-81, specifically the predominately Black community adjacent to the viaduct.
- Create a land trust for the eight acres directly east of Martin Luther King Boulevard East for development by residents connected to the community.
- Accommodate residents who would like to relocate with an automatic right to return.

Protect Health and Wealth

- Conduct a cumulative exposure analysis for residents who live in the communities within 600 feet of the viaduct that includes a lead, noise, and air analysis and abatement.
- Conduct a community health needs assessment.
- Do not use Wilson Park as a staging site for construction or construction materials.
- Create a Community Restoration Fund.
- Offer market-rate buyouts, rent subsidies, and/or temporary relocation assistance for people who want to move.
- Conduct an easement reassessment so that renters receive easement payments.

Access to Opportunity

- Jobs generated by the project must go to the people who live directly adjacent to the viaduct and 30 percent of them should go to Black and Brown Syracuse residents.
- Apply for the federal “SEP 14” local hiring pilot program, and limit the hiring requirements to Syracuse residents. The SEP 14 application must be accompanied by a community workforce agreement to legally require that unions hire local Syracuse residents, with a preference for impacted Syracuse neighborhoods. The DOT must also provide independent oversight to ensure the goals of the labor agreement are met.
- Expand roads starting east of MLK Blvd. to the street grid and east side of Syracuse.
- Provide governmental oversight on all aspects of this project until it is complete.

Protect School Children

- Create a comprehensive construction plan in collaboration with parents, faculty, and staff at the Syracuse City School District.
- Move the proposed highway access ramp so it is at least 600 feet from STEAM at Dr. King Elementary School.
- Conduct a study to determine if the community grid will remain a major roadway, as defined by 30,000 cars or more daily.

We appreciate the opportunity to comment on this important matter.

Sincerely,

/s/ Lindsay Speer

On Behalf Of Neighbors of the Onondaga Nation

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Subject:	FW: NYCLU I-81 Public Comment Submission
Date:	Friday, October 15, 2021 8:57:51 AM
Attachments:	NYCLU I-81 Public Comment.pdf Ex. A Building a Better Future.pdf Ex. B EAC Comment.pdf

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From: Lanessa Chaplin <lchaplin@nyclu.org>
Sent: Thursday, October 14, 2021 8:57 PM
To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>
Subject: FW: NYCLU I-81 Public Comment Submission

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Good Evening Mark,

I emailed comments this evening but didn't receive the typical bounce back of "thanks for submitting these comments". I am confirming with you they are receive the comments and also reattaching them here in the event you did not.

Best,
Lanessa

From: Lanessa Chaplin
Sent: Thursday, October 14, 2021 4:55 PM
To: i81opportunities@dot.ny.gov
Cc: Molly Biklen <mbiklen@nyclu.org>
Subject: NYCLU I-81 Public Comment Submission

Good Afternoon Mark,

Please accept attached documents as a public comment submission on behalf of the New York Civil Liberties Union, in response to the I-81 Draft Environmental Impact Statement.

Best,

Lanessa L. Owens- Chaplin, Esq.
Project Counsel
New York Civil Liberties Union
Central New York Chapter
499 S. Warren Street Suite 430
Syracuse, NY 13202
■ o 315.299.4863 ■ lchaplin@nyclu.org

New York Civil Liberties Union
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Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
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Donna Lieberman
Executive Director

Olivier Sylvain
President

Comment of the New York Civil Liberties Union, The New York Affiliate of the American Civil Liberties Union, in Response to New York State Department of Transportation's 2021 Draft Environmental Impact Statement for the redevelopment of Interstate 81

Mark Frechette, Project Director,

The New York Civil Liberties Union ("NYCLU") submits this comment to the New York States Department of Transportation ("NYSDOT") in response to the 2021 Draft Environmental Impact Statement ("2021 DEIS") released July 2021.

The NYCLU supports, in part, the NYSDOT's preferred option of the community grid, and in particular, the permanent removal of the 1.4-mile raised viaduct and supports its replacement with a walkable user-friendly street-grid option. The removal of the viaduct is the first step in restoring a community that the original construction of Interstate 81 ("I-81") destroyed. However, we do not support the 2021 DEIS's conclusion that the environmental justice community—primarily Black neighborhoods adjacent to the viaduct—will not be impacted by the I-81 Project. This conclusion is unsupported and the result of NYSDOT's failure to adequately examine the impact of the Project on lead exposure, air quality, and the potential displacement on the largely Black residents adjacent to the I-81 Project. As set forth in the NYCLU report, Building a Better Future: The Structural Racism Built in I-81, and How to Tear it Down ("Building a Better Future Report"),[1] NYSDOT must take steps to protect the health and livelihoods of these residents.

The NYCLU is an important stakeholder in the environmental impact statement process because of our participation and advocacy for an equitable outcome of the I-81 Project. The NYCLU's mission is to advocate for all New Yorkers to have equal access to opportunities and the equal ability to participate in government decisions that affect them. This includes planning and development decisions, which have historically excluded or intentionally discriminated against Black, Indigenous, and Latinx New Yorkers– much like the original design and construction of I-81. The NYCLU's goal is to achieve racial and environmental equity by advocating that the I-81 Project improve educational, housing and health outcomes for Black communities living adjacent to the raised viaduct. Along with the submission of this written public comment, the NYCLU will be

[1] NYCLU, BUILDING A BETTER FUTURE: THE STRUCTURAL RACISM BUILT IN I-81, AND HOW TO TEAR IT DOWN 12 (2021), https://www.nyclu.org/en/publications/building-better-future. *See* Attached Appendix A.

hand-delivering thousands of comments submitted by community members, advocating for an equitable outcome.[2]

I. NYSDOT Must Address the Environmental Justice Impacts of the I-81 Construction Project

The Federal Highway Administration ("FWHA") has delegated project review and oversight responsibilities to the NYSDOT, which accordingly must comply with the National Environmental Policy Act ("NEPA") and other applicable state and federal regulations. NEPA requires state agencies "to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations." 42 U.S.C § 4331(a). Under NEPA, NYSDOT is required to review the environmental impacts from its construction plan and to take the steps to address alternatives to any adverse effect from agency action through an Environmental Impact Statement. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 348 (1989) (requiring agencies to provide a "detailed statement" on the adverse effects of and potential alternatives to the proposed action). In doing so, transit agencies such as NYSDOT must also consider discrimination as effects within the meaning of NEPA and eliminate discrimination when found to exist. 23 C.F.R. § 200.9(b)(14).

Like NEPA, the New York State Environmental Quality Review Act ("SEQR") requires the agency to balance social, economic and environmental factors to be incorporated into the planning and decision-making processes of state, regional and local agencies. 6 N.Y.C.R.R. § 617.1(d). As part of this consideration, the Act defines "environment" as not only the physical conditions which will be affected by a proposed action, but existing neighborhood character as well. 6 N.Y.C.R.R. § 617.2*(*l); Envt. Conserv. § 8-0105(6). SEQR requires agencies to consider existing patterns of populations and distribution in the communities that will be impacted by agency action. *Ordonez v. City of N.Y.*, 60 Misc. 3d 1213 (N.Y. Sup. Ct. 2018).

Together, NEPA and SEQR require NYSDOT to take a "hard look" at the economic and social impacts of the I-81 Project. *See* 42 U.S.C. § 4321; *Marsh v. Or. Nat. Res. Council*, 490 U.S. 360, 374 (1989) (agencies must employ a "hard look" when reviewing the environmental impacts of a proposal, alternatives capable of achieving the objectives of the proposal, and any measures to mitigate adverse impacts). A "hard look" occurs when an agency "adequately considered and disclosed the environmental impact of its actions." *Baltimore Gas & Elec. Co. v. Nat. Res. Def. Council, Inc.,* 462 U.S. 87, 98 (1983). But the 2021 DEIS does not take a "hard look" with respect to the lead exposure, air quality, and land use concerns of the predominately Black community that will be affected by the I-81 Project.

In addition to the procedural requirements of NEPA and SEQR, NYSDOT must actively ensure that the Project does not cause disproportionate and adverse impacts on the basis of race and ethnicity. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, mandates federal agencies and their designees to identify and address the disproportionate environmental impacts to

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environmental justice populations, defined as communities that are majority "minority" or majority low-income. Exec. Order No. 12898, 59 Fed. Reg. 7629 (Feb. 16. 1994) ("E.O. 12898"). E.O. 12898 requires agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority populations and low-income populations to the maximum extent practicable and permitted by law. *Id*.; *see also Coal. for Healthy Ports v. U.S. Coast Guard*, No. 13-CV-5347, 2015 WL 7460018, at *2-*3 (S.D.N.Y Nov. 24, 2015) (agencies must consider the environmental justice impacts from the proposed agency action).[3] The NYSDOT has identified the community adjacent to the viaduct as a majority Black community and therefore an environmental justice community. 2021 DEIS, Section 6-2-3 at 6-87 . As such, the NYSDOT has a heightened responsibility to this environmental justice community to ensure that the disproportionate impacts of the Project are remedied.

Further, as a recipient of federal funding, NYSDOT is required to comply with Title VI of the Civil Right Act of 1964.[4] 42 U.S.C. § 2000d; 49 C.F.R. § 21. Title VI provides that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." *Id*. But, as identified in this comment and in the Building a Better Future Report, and in the detailed analysis attached as Appendix B, NYSDOT has failed to meet the standards set in E.O. 12898 and Title VI to use all practicable means permitted by law to address disproportionate or adverse impacts that the I-81 Project will have on the adjacent Black communities, when a lessor option is available or without identifying and mitigating these impacts. NYSDOT has failed to meet the standards set in E.O. 12898 and Title VI to use all practicable means permitted by law to address disproportionate or adverse impacts that the I-81 Project will have on the adjacent a Black community, when a lessor option is available or without mitigating these impacts.

a. **The 2021 DEIS Fails to Address the Elevated levels of Lead in the Black Community Adjacent to the I-81 Viaduct**

Under NEPA, the NYSDOT must present a "detailed statement by the responsible official" that enables the public to "weigh a project's benefits against its environmental costs." *Sierra Club v. U.S. Army Corps of Eng'rs (Sierra Club I),* 772 F.2d 1043, 1049 (2d Cir. 1985). Yet, the NYSDOT has failed to do that with respect to the lead exposure

[3] In accordance with 2011 Federal Highway Administration guidance on environmental justice and NEPA: "After defining the Environmental Justice Study Area, the assessment of the potential for disproportionately high and adverse effects to environmental justice communities must follow these steps (4)If effects would remain adverse after mitigation is considered, identify whether those effects would be predominately borne by the environmental justice communities or are appreciably more severe or greater in magnitude on the environmental justice community than the adverse effect suffered by the non-minority or non-low-income community (i.e., disproportionately high and adverse effects); and (5) if disproportionately high and adverse effects on environmental justice communities are anticipated, evaluate whether there is a further practicable mitigation measure or practicable alternative that would avoid or reduce the disproportionately high and adverse effects." FED. HIGHWAY ADMIN., HEP-1, GUIDANCE ON ENVIRONMENTAL JUSTICE AND NEPA (2011), https://www.environment.fhwa.dot.gov/env_topics/ej/guidance_ejustice-nepa.aspx.

[4] *See* 2021 DEIS Section 4(f) Evaluation 1-1 (receipt of federal funds).

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by the I-81 Project, even after the NYCLU and others raised this issue with respect to the 2019 Preliminary Draft Impact Statement ("2019 Preliminary Draft"). Remarkably, the NYSDOT failed to test the 1.4-mile viaduct for lead paint and specifically notes that "[n]one of the structures were analyzed for the presence of lead paint." *Id*.; 2021 DEIS, Section 4(f) Evaluation 6-510.

Instead of analyzing lead on the 1.4-mile raised viaduct, the 2021 DEIS makes a perfunctory statement that painted structures constructed prior to 1988 "are considered hazardous."[5] 2021 DEIS at 6-508. But this statement fails to account for lead embedded in the highway in addition to the lead paint, such as lead deposited from decades of leaded-gasoline use. The complete absence of data on lead levels prevents the public from being able to make a "reasoned decision" regarding the potential impacts of lead from the Project and thus fails to provide the type of detailed statement by a responsible official required by law. *Sierra Club v. U.S. Army Corps of Eng'rs (Sierra Club II)*, 701 F.2d 1011, 1029, 1031 (2d Cir. 1983). In *Sierra Club II*, three agencies submitted comments on the draft environmental impact statement raising concerns that it relied on incorrect data or outdated data regarding the impact of the project on fisheries. *Id*. at 1017. When the final environmental impact statement was issued, the agency purported to address those concerns, but "no new studies were performed, no additional information was collected, no further inquiry was made; and the FEIS essentially reiterated or adopted the statements in the DEIS." *Id.* at 1030. The court held that the EIS was insufficient because the agency "could not have fully considered and balanced the environmental factors" because it relied on inaccurate data and outdated data. *Id*. at 1031. So too here, NYSDOT cannot fully consider and balance the environmental factors or inform the public if it does not have any data on the actual lead exposures to the environmental justice community adjacent to the viaduct. *See id*.

NEPA requires agencies to consider cumulative impacts, which are impacts on the environment that result from the "incremental impact of the action when added to other past, present, and reasonably foreseeable future actions," 40 C.F.R. § 1508.7 (repealed 2020), as well as the direct and indirect effects, meaning effects that are "later in time or farther removed in distance, but are still reasonably foreseeable." 40 C.F.R. § 1508.8(b). The areas in the Project zone are a "hot spot" for lead poisoning: more than 26 percent of children tested in this community have elevated lead levels, more than three times the national average.[6] *See* Building Better Future Report at 12. The 2021 DEIS does not consider the current lead problem in the evaluation of the cumulative or indirect impacts of lead exposure created by the demolition of the I-81 viaduct.

Again, this is another example of the NYSDOT failing to meet its obligations to identify and address the disproportionate environmental impacts to environmental justice populations related to the Project. *See* E.O. 12898. This predominately Black community is riddled with existing lead. Syracuse has one of the worst lead poisoning crises in the

[5] Specifically, bridges constructed prior to 1988 and that have not previously received "100% abrasively blasted to a surface preparation standard of Steel Structures Painting Council (SSPC) Specification (SP) 10 near-white blast cleaning metal standard." 2021 DEIS at 6-508. By contrast, the 2021 DEIS identified and tested 108 structures for asbestos and acknowledges in Appendix K which structures tested positive for asbestos.

[6] *Lead in CNY*, LEAD SAFE CNY, https://www.leadsafecny.org/lead-in-cny.html (last visited Oct. 10, 2021) ("more than three times higher than the national average and the highest in the Syracuse area").

nation.[7] The Lead poisoning exists at the intersections of race and class. The neighborhoods with the highest rates of poisoning also have the highest populations of low-income children of color, specifically in the Black communities in the zone of the Project.[8] This is exactly the type of lack of consideration E.O. 12898 was enacted to mitigate. Therefore, it is especially important that NYSDOT undertake a full analysis so that this community can obtain the mitigation measures required to protect children's health.

b. The DEIS Fails to Conduct Independent Air Quality Test Impacting the Black Community Closest to the Viaduct.

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The 2021 DEIS concludes that there will be no adverse cumulative effects related to air quality because either the viaduct or community grid alternative will not exceed the National Ambient Air Quality Standards ("NAAQS") limits.[9] But this conclusion is without any support in actual data. Without proper tests of the air quality within the footprint of the environmental justice community, the NYSDOT simply has no basis to arrive at this conclusion, and in any event, that is not the standard the NYSDOT must meet when proposing a project in an environmental justice community. Rather, the NYSDOT must determine if there will be a disproportionate impact on the environmental justice community, when compared to non-environmental justice communities. *See* E.O. 12898.

The NYSDOT responded to public concerns regarding air quality in the vicinity of I-81, and preformed additional testing. However the NYSDOT placed air monitors outside the environmental justice area, specifically at the cross section of Burt Avenue and Almond Street, arguably the closest residential community to the viaduct. The NYSDOT used the median average of those air monitoring test to draw the conclusion that the community will not be adversely impacted by increased air pollution. 2021 DEIS Section 6-4-4, at 6-249. Moreover, the NYDSOT failed to adequately consider the cumulative impacts of the I-81 project on air quality as this community is already overburdened with air pollution. 40 C.F.R. § 1508.7 (repealed 2020). In the footprint of the Project there is the Midland Avenue Regional (sewage) Treatment Facility and the Syracuse University Steam Plant. Shockingly, the NYSDOT failed to consider or address any of the existing air pollutants. In *City of Carmel v. U.S. Dept. of Transportation*, the Court of Appeals for the Ninth Circuit explained that an EIS must "catalogue adequately the relevant past projects in the area" and include a "useful analysis of the cumulative impacts of past, present, and future projects." 123 F.3d 1142, 1160 (9th Cir. 1997). The 2021 DEIS does not do this and thus cannot adequately take a hard look at the cumulative effects of the I-81 Project on air quality.

Furthermore, as explained in the Building a Better Future Report, the Black communities in the footprint of the Project have elevated Asthma rates as compared to non-minority population in Syracuse. Building a Better Future Report 12. Again, the NYSDOT air

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[7] Sydney Gold, *Some Syracuse Families Suffer Generations of Lead Poisoning: First Report in Series on Lead Crisis*, WAER (Mar. 23, 2021), https://www.waer.org/local-news/2021-03-23/some-syracuse-families-suffer-generations-of-lead-poisoning-first-report-in-series-on-lead-crisis.

[8] *Id*.

quality test fails meet the standards set by Title VI and E.O. 12898 by failing to ensure federal dollars will not be used in a way that will disproportionately overburden the environmental justice community with higher rates of air pollution than non-minority populations in the footprint of the project.

The 2021 DEIS's cursory NAAQS review does not consider if there is a disproportionate impact on air quality for an environmental justice community, which is highly likely given the pollution burdens already present in the neighborhood. *See* Building a Better Future Report 22. The Court of Appeals for the Fourth Circuit's decision in *Friends of Buckingham v. State Air Pollution Control Board*, is instructive on the limits of reliance on the NAAQS. 947 F.3d 68, 88 (4th Cir. 2020). There, the court determined that the State Air Pollution Control Board of Virginia failed to ensure that the developers did not impose a disproportionate impact on the predominantly African American community because they simply relied upon the fact that the air quality surrounding the proposed project will fall within the NAAQS limits. *Id.* at 86. The court held that simply staying within the confines of the NAAQS does not mean that a disproportionate impact on minority or disadvantaged communities did not take place. *Id.* at 93.

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The 2021 DEIS further contends that each of the alternatives, including the community grid, would be below the NAAQS limits. But this is assertion is insufficient in two ways. First, the NAAQS is limited to reviewing 24-hour and annual average exposures, and thus misses the maximum exposure time periods that can have significant health impacts, specifically for school-aged children. Review of the National Ambient Air Quality Standards for Particulate Matter, 85 Fed. Reg. 82684 (Dec. 18, 2020). Periods of maximum exposure should not be ignored here because STEAM at Dr. King Elementary School and Toomey Abbott Towers, a senior residential building, are adjacent to where construction equipment, omitting harmful pollution into the air. 2021 DEIS Section 4(f) Evaluation 3-33. The NYSDOT must take a hard look at the air pollution exposure during prime traffic times in connection with school travel schedules, outdoor play time, and heavy travel times.

c. NYSDOT Must Move the Roundabout More than 600 feet from STEAM at Dr. King

The 2021 DEIS, community grid alternative recommends a roundabout access ramp to be constructed at the end of Martin Luther King, Jr. East Steet, just past Leon Street. 2021 DEIS Section 4(f) Evaluation 3-33.[10] The roundabout will abut STEAM at Dr. King Elementary school and be less than 175 feet from where school-aged children learn and

[10] We are pleased to learn that NYSDOT are considering these concerns and considering moving the Roundabout away from STEAM at Dr. King. Teri Weaver, *NY DOT hears 'loud and clear' almost no one wants I-81 roundabout near school*, SYRACUSE.COM (Sep. 10, 2021), https://www.syracuse.com/state/2021/09/ny-dot-hears-loud-and-clear-almost-no-one-wants-i-81-roundabout-near-school.html ("Mark Frechette, the state official overseeing the I-81 project, says the message is getting through. 'One of the things we've heard loud and clear from the public is concerns about the roundabout,' Frechette said. …[E]ngineers are taking another look at what other alternatives would effectively slow down highway traffic and bring it to ground level along what is Almond Street now. 'More to come on the roundabout,' Frechette said. 'Give us a chance to do the appropriate analysis.'")

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play.[11] The 2021 DEIS does not evaluate the potential long-term health effects that emissions and exhaust from cars and trucks on the roundabout could have on the children who attend STEAM at Dr. King. The 2021 DEIS states that "there would be no appreciable difference in overall" Mobile Source Air Toxics between ("MSAT") between the community grid alternative and the no build alternative. *Id.* at 6-250. However, the report does concede that "there may be localized areas of increased ambient concentrations of MSATs" in locations where "traffic volumes are predicted to increase, or re-designed roadway sections would be located closer to nearby residences, *schools*, and businesses." *Id*. The blanket statement fails to provide *any* detail of what the impact may be. And again the 2021 DEIS reiterates that air quality will not exceed NAAQS, which is not the burden the NYSDOT must meet. The 2021 DEIS must determine if there is a disproportionate impact on air quality for the environmental justice community as compared to communities not defined as environmental justice communities. *See Buckingham*, 947 F.3d at 87.

While we recognize the benefits generally for a roundabout to calm traffic, the placement of any major roadway access within 200 feet of an elementary school is a major concern. *See* Building a Better Future Report 25. The negative impacts of air pollution on school-aged children, specifically from vehicle pollution, is well-documented. For example, the EPA's Best Practices for Reducing Near- Road Pollution recommends schools be at least 500-600 feet away from a major roadway.[12] The 2021 DEIS estimates 38,000 per day will travel along the roundabout. Appendix M-5, R 4-14 pg. 79. The Centers for Disease Control's Health Disparities and Inequalities Report makes clear that exposure to air pollution is greatest for communities that are within 500-600 feet of a major roadway, which is defined as 30,000 cars or more per day.[13]

The complete failure to analyze disproportionate impacts of air pollution to a majority Black student population at STEAM at Dr. King or utilize best practices is particularly problematic because the NYSDOT failed to meet the mandates set in E.O. 12898. In addition, the 2021 DEIS recognizes that there may be increases in ambient MSAT's in localized areas, including schools, in close proximity to the redesigned roadway sections yet fails to provide the requisite "hard look" at how air pollution will impact the environmental justice community. The NYCLU provided a detailed explanation in the Building a Better Future Report for moving the roundabout or any access ramp at least 600 feet away from the STEAM at Dr. King, and the NYSDOT must reconsider its approach. Building a Better Future Report 25.

The NYSDOT must undo the harm the viaduct created by overexposing children to air pollution.[14] Shockingly, however the 2021 DEIS places a major roadway even closer than the current viaduct. Approximately 23 states regulate the placement of major roadways

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[11] A computer-generated visual rendering shows the distance between the proposed roundabout and STEAM at Dr. King Elementary School in 2021 DEIS, Figure 3-38.

[12] ENV'T. PROT. AGENCY, BEST PRACTICES FOR REDUCING NEAR-ROAD POLLUTION EXPOSURE AT SCHOOLS (2015), https://www.epa.gov/sites/default/files/2015-10/documents/ochp_2015_near_road_pollution_booklet_v16_508.pdf.

[13] CTR. DISEASE CONTROL, RESIDENTIAL PROXIMITY TO MAJOR HIGHWAYS — UNITED STATES (2013), https://www.cdc.gov/mmwr/preview/mmwrhtml/su6203a8.htm.

[14] NEPA COMM. AND FED. INTERAGENCY WORKING GRP. ENV'T. JUSTICE, PROMISING PRACTICES FOR EJ METHODOLOGIES IN NEPA REVIEWS 40 (2016), https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf; 23 C.F.R. § 200.9(b)(14).

near schools through legislation.[15] For example, California enacted a law prohibiting the construction of major highways within 500 feet of a school. The legislative intent is to address the "strong links between particulate and other pollutants and asthma, which is the most common chronic illness affecting children. Asthma causes more missed school days than any other chronic condition and is associated with poorer academic performance."[16] Similarly, The NYS legislatures introduced the SIGH act prohibiting the construction of major roadways within 600 feet of schools and vice versa. S.B. 6887, 2016 Leg. (N.Y. 2016); Assemb. B. 10998, 2020 Leg. (N.Y. 2020). The law has not passed but § 2 of the legislative intent demonstrates the need for the bill, stating, "The purpose of this act is to address the disproportionate impact of environmental hazards on Black and Brown communities, specifically to protect children and young adults from the health risks associated with long-term exposure to pollutants which derive from living and attending school in close proximity to major roadways and highway projects. Traffic is one of the most significant sources of air pollution in both the indoor and outdoor school. "[17] NYSDOT is completely ignoring established best practices to undo acts that created disproportionate harm to the Black school community.[18]

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II. Future Land Use the displacement of majority Black residents in the environmental justice community.

The 2021 DEIS estimates the project will result in "approximately 10 to 12.5 acres" of surplus property located mostly near Almond Street and Erie Boulevard, where the raised viaduct currently is located, and where other ramps will be removed. 2021 DEIS, Appendix M-5 at 92. In response to the submission of public comments the NYSDOT has committed to creating a "land use working group" to evaluate the transfer and development of these surplus parcels. Appendix M-5 at 92. This land use working group is a great first step in achieving an equitable outcome in the I-81 Project, but there are additional steps the NYSDOT should do to protect and restore the community adjacent to the I-81 Project.

The 2021 DEIS states any new use or development of the land would be subject to the city's zoning ordinances, which are currently being updated through the city's "Rezone Syracuse" project. *Id*. at 93. However, the NYSDOT cannot avoid its obligations simply by stating the land is subject to zoning ordinances. The NYSDOT must take active steps and attach conditions to the transfer of the land, creating a land trust to prevent disruption to the character of the community. Attaching conditions to the transfer of the 10-12-acre parcel of land to the City of Syracuse will prevent negative and disproportionate adverse impacts from the I-81 Project and also ensure the Black community benefits from the Project. So, while the preferred community grid option does not create immediate displacement of residents, there are significant community concerns regarding future land

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[15] THE NEW SCH.: THE TISHMAN ENV'T. & DESIGN CTR., LOCAL POLICIES FOR ENVIRONMENTAL JUSTICE: A NATIONAL SCAN (2019), https://doi.org/doi:10.7282/t3-pywf-p055.
[16] S.B. 352, 2003 Leg. (Cal. 2003).
[17] Assemb. B. 10998, 2020 Leg. (N.Y. 2020).
[18] For further details on the impact of the original build of I-81 please refer to BUILDING A BETTER FUTURE REPORT 4.

use and potential for displacement that have not been considered by the 2021 DEIS. *See* Building a Better Future Report 17 for in depth analysis on future land use.

III. Conclusion

The 2021 DEIS's conclusion that the environmental justice community will not be impacted by construction and post construction is inaccurate and a result of NYSDOT's failure to evaluate the environmental justice community's exposure to lead, air quality and future land use properly. As a result of this failure, the NYSDOT did not take a hard look at the impacts faced by the environmental justice community and fails to meet its obligations. NYSDOT is not able to provide the necessary protections, avoidance, and mitigations required to have an equitable outcome from I-81 Project.

For reasons discussed above, the Building a Better Future Report, and the comments submitted by community members, and other attachments, the 2021 DEIS does not satisfy the standards to address the environmental, economic, and social impacts to the Black community in the footprint of construction, identified in the 2021 DEIS as an environmental justice community. It is crucial to the health, safety, and long-term quality of life of the Black community that the NYSDOT re-evaluate its proposed plan of action to sufficiently consider and mitigate environmental, social, cultural, and impacts to the environmental justice community.

Regards,

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EXHIBIT A

BUILDING A BETTER FUTURE:

The Structural Racism Built into I-81, and How to Tear it Down

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Finally, we must acknowledge every community member who participated in our workshops and forums and shared your stories, concerns, history and connections to the I-81 viaduct. We hope this report captures our conversations and does some justice to elevate your voice in this conversation.

About the NYCLU

The New York Civil Liberties Union (NYCLU) is one of the nation's foremost defenders of civil liberties and civil rights.

Founded in 1951 as the New York affiliate of the American Civil Liberties Union, we are a not-for-profit, nonpartisan organization with eight chapters and regional offices, and more than 160,000 members across the state. Our mission is to defend and promote the fundamental principles and values embodied in the Bill of Rights, the U.S. Constitution, and the New York Constitution, including freedom of speech and religion, and the right to privacy, equality and due process of law, with particular attention to the pervasive and persistent harms of racism.

The NYCLU works toward its mission by advocating for all New Yorkers to have equal access to opportunities and the equal ability to participate in government decisions that affect them. This includes planning and development decisions, which historically have excluded or intentionally discriminated against Black, Indigenous, and Latinx New Yorkers. The NYCLU is incorporated under the laws of the State of New York, with its principal place of business in New York, New York.

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FOREWORD

In 1960, approximately 11,000 Black people lived in the City of Syracuse, with as many as 90 percent living in the 15th Ward. That neighborhood became the focus of an urban renewal project that included the construction of the I-81 highway, which ripped through the heart of the 15th Ward. The result was displacement and the destruction of what had been an under-resourced, working-class, but still vibrant neighborhood. In all, 1,300 residents were displaced by the original construction of the 1.4 mile stretch of the I-81 viaduct.[1]

During this period in American history, highway construction served as one of the principal instruments in the pursuit of "slum clearance." As the federal highway program expanded significantly in the 1950s and '60s, state and local governments, with the acquiescence of federal officials, used this program to diminish Black neighborhoods, segregate Black people from white people, and decrease the population and vibrancy of Black urban communities.

Completed in 1968, I-81 has remained both a concrete and symbolic representation of false promises and failed policies. The poorest and wealthiest parts of Syracuse are now physically separated by I-81.[2] But the viaduct has reached the end of its useful life; it is crumbling, does not comply with current highway regulations, and must be replaced. At the same time, Syracuse remains one of the most segregated cities in the country,[3] and it has the nation's highest concentration of poverty among Black and Latinx communities.[4]

The I-81 project could be the catalyst for knitting back together what the highway destroyed. By taking a hard look at the harms done to people in the past, there is a real chance to improve housing conditions, health outcomes, and economic and educational opportunity for all people in Syracuse. This will require uncomfortable honesty about systemic racism. But if we ignore this history, city and state officials run the risk of displacing people all over again, further entrenching poverty and segregation.

INTRODUCTION: PAVING A NEW PATH

The removal and replacement of the I-81 highway is a public project so large and complicated that it is difficult to see the whole picture. It is not simple or obvious how a physical, asphalt-and-concrete infrastructure project implicates civil rights, access to education, economic justice, and freedom from environmental racism. In fact, even experts in municipal land use, highway construction, school zoning, and environmental protection don't always see how their roles are interconnected in the lives of real people.

This report will connect these dots, explaining how history has led us here, and make recommendations about how to move forward.

A variety of proposals have been suggested to replace the highway, and all will involve intensive, long-term construction. The people who will bear the greatest burden from the construction, whatever form it takes, are the largely Black and Brown residents living in the area that adjoins the current I-81 viaduct, locally known as "the bridge." The New York State Department of Transportation ("NYSDOT") must take steps to protect the health and livelihoods of these residents.

Additionally, a highly racially segregated school, STEAM at Dr. King Elementary School, sits at the edge of the I-81 highway. The children attending this school are already vulnerable to environmental injuries from the viaduct, and this will be compounded during and after construction.

The removal of the viaduct presents a considerable challenge, but also offers a significant opportunity to restore a community that has lacked real investment. Better outcomes are possible, but getting there will require commitment to a bold vision. In this report, we present such a vision in a four-step path:

1. If NYSDOT moves forward with the community grid option, approximately 18 acres of developable land will become available. NYSDOT must transfer ownership of this land to the City of Syracuse, in particular the

eight acres adjacent to the viaduct, only on the condition that it be placed in a land trust that affords control to residents of the southeast community.

2. The NYSDOT is responsible for minimizing environmental and economic harms to those living along the I-81 viaduct during and after construction. This includes making sure people have a safe place to sleep, eat, and work, and access to transportation when they need it. If people need to be moved during construction, they must be offered a meaningful path back, and must not suffer economic injury as a result.

3. The NYSDOT must take a reparative, restorative approach to the I-81 project, to take advantage of the once-in-a-generation opportunity to close the wealth gap and increase access to hospitals, educational institutions, and jobs through redevelopment and improved connections between different parts of Syracuse.

4. The NYSDOT must adopt measures to protect the children attending STEAM at Dr. King Elementary School from environmental harm during and after construction of the I-81 replacement. In addition, NYSDOT must not move forward with plans for an access ramp within 600 feet of the school.

These four proposals are based on direct input from people living in the most impacted community. As this process moves forward, it will be essential for public officials to be in two-way communication with those residents who live closest to the viaduct, and who have been politically marginalized. Given the historical injuries sustained by those who lived in the 15th Ward, and the proximity of the current community to the anticipated construction, it is particularly vital to address their needs.

NEW YORK IS REQUIRED TO ACT

Addressing the serious issues raised in this report is not just a matter of good policy – it is the law.

The community on the southeast side of the I-81 viaduct has been designated as an "environmental justice community" by the NYSDOT. This technical designation entitles local residents to participate in the decision-making process around the project, and to be protected from shouldering a disproportionate burden of its environmental and social consequences. Both state and federal laws provide specific protections for this community.

First, the **National Environmental Policy Act ("NEPA")** mandates that all federal agencies prepare a detailed environmental impact statement ("EIS") to analyze the adverse environmental effects of proposed agency actions. The EIS must address:

- The environmental impacts of the proposed action.
- Any adverse environmental effects that cannot be avoided, should the proposal be implemented.
- Alternatives to the proposed action.[5]

NEPA applies to all "major projects" designated by the Federal Highways Administration (FHWA). That collaboration means NYSDOT and FHWA must produce an EIS together.

The second relevant law is **Executive Order (E.O.) 12898**. The E.O. recognizes that some communities have historically been overburdened by environmental hazards while being excluded from the decisions about who will endure those hazards. This pattern has created the environmental injustice and environmental racism we are grappling with in Syracuse today. To address this history, the E.O. calls on all federal agencies to identify and address programs, policies, and activities that adversely and disproportionately impact these communities, and to solicit meaningful public participation before starting any major project that could impact local conditions. It also directs those agencies to make environmental justice a part of their missions.

Third, **Title VI of the Civil Rights Act**, specifically

referenced in the E.O., prohibits practices that have the **effect** of discriminating on the basis of race, color, or national origin. This goes beyond intentional discrimination for federal agencies and is designed to ensure that federal funds are not being used for discriminatory purposes, even if intent cannot be proven.[6] The U.S. Department of Transportation recognizes these efforts to not only include pollution prevention and health and safety measures, but also measures to maintain community cohesion, economic vitality, and mitigation and compensatory measures. The southeast community must not be disproportionately impacted by this project and must share equitably in the improved economic, health, education, environmental, and housing conditions that result from the redevelopment.

Finally, the **New York State Environmental Quality Review Act (SEQR)** is a state law mandating that the existing community and neighborhood character be considered when new projects are planned.[7] Courts have also recognized that displacement of low-income people must be considered in planning new projects like this one.[8] SEQR actually requires the NYSDOT to address the potential displacement of current residents (either by covering the costs of relocation or offering alternatives), whereas NEPA only requires the EIS to consider those outcomes.

Understanding this community in Syracuse, and the laws that are in place to prevent recurring harm to it, is essential to understanding this project. People who have lived in this neighborhood for generations have experienced government discrimination and environmental burdens at every level. During America's "urban renewal" period and the original build of I-81, Black Syracuse residents lost ownership of about 101 tracts of land under the guise of economic development.[9] Thousands of families were displaced, lost their property, and were increasingly concentrated in neighborhoods with very little opportunity or resources.

This has led to decades of harm, which could be exacerbated if the new I-81 project is not intentional about addressing these past harms.

I-81's Legacy of Inequality

THE WEALTH GAP

Syracuse has one of the largest racial poverty gaps of any metropolitan area in the nation. An estimated 40 percent of Syracuse's Black residents live below the poverty line, far more than the 11 percent of white residents living in poverty. It is a gap that is more than double the national average.[10] Of the nation's 100 largest metropolitan areas, Syracuse has the highest level of poverty concentration among Black and Latinx communities.[11]

Much of that poverty can be traced back to decisions on government policies that were made decades ago. The 1937 redlining of Syracuse included the 15th Ward on the southeast edge of downtown.[12] Redlining was the government-backed policy of refusing mortgage insurance to buyers in communities of color. As a result, Black Syracuse residents who needed bank loans to buy property, fix their homes, and build equity were routinely denied such opportunities.[13] Additionally, displaced residents were paid less than market value for their properties when they were taken for the I-81 project.

Today, the homes in this community include concentrations of some of the oldest homes in the nation, making them more expensive to maintain and more difficult to provide security for loans.[14] This has resulted in stark racial disparities in home ownership rates, which accounts for significant disparities in accumulated capital and wealth.[15]

According to the U.S. Commission on Civil Rights, a massive number of Syracuse's Black residents were additionally displaced in the 1960s through "urban renewal" projects, including clearing land for middle and higher income housing developments, university student housing, and a medical center.[16] Often this displacement meant the irreversible loss of property and business ownership, access to jobs, and social and community connections, all of which contributed to generational loss of wealth accumulation.

SEGREGATED HOUSING

Residential segregation in Syracuse, as in many American cities, has been created and protected by the government. Beginning with the redlining of the 1930s and continuing through the original construction of I-81, Black Syracuse residents were consistently shut out of opportunities for improved housing and access to different neighborhoods. Once the roadway was put in, people who could afford to leave the area did so. But when the uprooted residents of the 15th Ward looked for new places to live, discriminatory housing practices severely limited their choices of new homes. Many ended up moving just south of the viaduct and forming a new Black neighborhood, one with even fewer resources than existed in the decimated 15th Ward.[17]

Property values fell at the onset of the original construction and continue to trend down today. The long-lasting impacts of the original construction of I-81 can still be seen in the neighborhood next to the viaduct, where its mostly Black residents have limited access to very few resources, few options for reasonably priced food, and limited access to health care and public transportation.[18] As noted by Central New York Fair Housing, "the largest impediment to housing choice in Syracuse…is the self-sustaining effects of overtly discriminatory policies from the past."[19]

Housing segregation is closely tied to school segregation. The Syracuse City School District is one of the most segregated school districts in the nation, and is home to the most segregated school district border in New York and some of the lowest performing schools in the state.[20] STEAM at Dr. King Elementary School, which sits within steps of the 1-81 viaduct, ranked at the bottom one percent for academic performance in New York in 2018.[21] No development can take place in Syracuse without serious consideration of its potential to impact housing and school segregation for better or for worse.

HEALTH IMPACTS

The decision to build a major raised roadway through a residential area has both direct and cumulative health implications today. As the value of the land nearest the viaduct plummeted, and the mostly Black residents were politically marginalized, the City doubled down on its environmental burdening of the neighborhood, creating and worsening serious environmental inequities. For example, the siting of the Midland Avenue Regional (sewage) Treatment Facility and the Syracuse University Steam Plant on McBride Street both disproportionately impact Black residents and further depress land value.[22] [23] [24] [25]

The area around the viaduct is also known as a hot spot for lead poisoning because of exposure to lead-based fuel from vehicles on the highway, lead paint and dust from the viaduct itself, and lead-based paint in aging homes.[26] Black residents have higher rates of both lead exposure and asthma than white people living in Syracuse.[27]

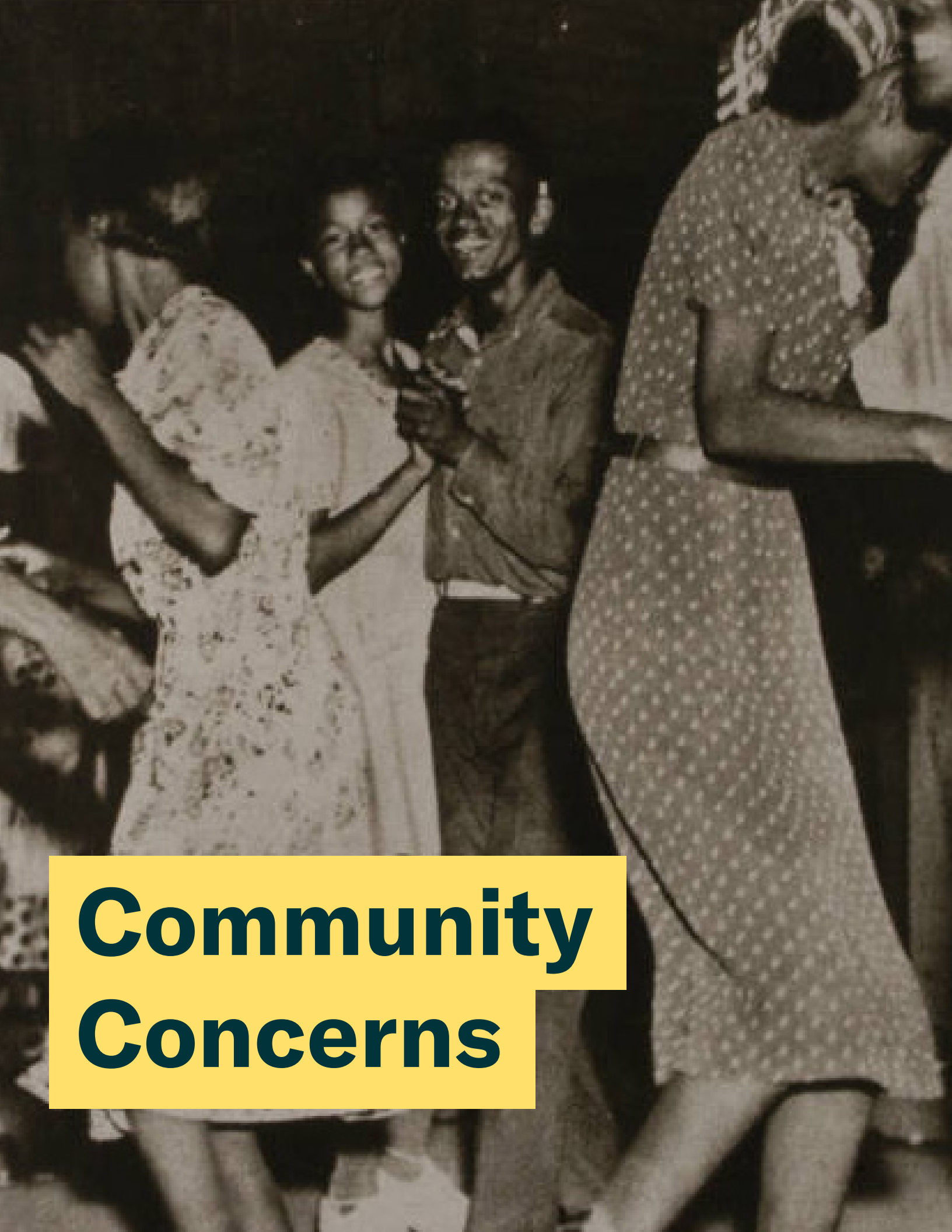
The harms of air pollution caused by highways are well studied. There is a causal link between exposure to traffic-related air pollution and impaired lung function, exacerbated asthma, the onset of childhood asthma, heart failure, and even death.[28] Despite this, the NYSDOT did not conduct targeted air tests in the residential areas closest to the I-81 viaduct or survey residents who have respiratory illnesses as a result of living in such close proximity to the viaduct.

Air pollution also impacts people's ability to earn a living, as sick people miss more workdays. The communities closest to the viaduct are in a concentrated area of poverty, with 67 percent of residents living below the poverty line and overwhelmingly employed in hourly wage jobs.[29] Hourly wageworkers are less likely to have paid sick leave. The NYSDOT must weigh this when considering the impact of people living near the viaduct.

Finally, the effects of 50 years of traffic air pollution on the community are immense. Syracuse City School District asthma rates are higher than the state average, and respiratory disease is especially prevalent among Black people in the region.[30] Notably, asthma hospitalization rates in the Syracuse City School District were among the highest in New York.[31]

This should be of particular concern to the families, students, and teachers at STEAM at Dr. King Elementary School, which is less than one block from the I-81 viaduct.[32] Poor air quality in schools is linked to lower academic performance as well as a myriad of health effects.[33]

Since 2011, the EPA has issued guidance to school districts to lessen the harm of traffic pollution within 600 feet downwind of major roadways, but we do not believe that guidance has been implemented at STEAM at Dr. King Elementary School.[34] In fact, the current EIS proposes an access ramp adjacent to the school.



Community Concerns

Beginning in 2018, the NYCLU committed resources and staff to work exclusively on the I-81 project. Our Central New York Chapter had been involved in conversations about I-81 since it was first constructed, and we recognized the need to bring our civil rights and racial justice lens to the current conversation.

We had three primary goals: First, to share information about the I-81 project with community members who are often left out of public conversations. Second, to listen to their concerns and questions and relay those comments to NYSDOT. And finally, to build trust with community members to help achieve their hopes for the neighborhood. We quickly realized that despite being legally recognized as environmental justice communities, residents who lived closest to the viaduct were not given adequate information about the specifications of the project, and they did not believe their voices would be heard.

The NYCLU embarked on a committed effort to engage community members who resided alongside the I-81 viaduct. Partnering with community leaders and parent engagement teams from STEAM at Dr. King Elementary School, we hosted community conversations, went door-to-door, and engaged in in-depth interviews of residents for two years. We used what we learned from our meetings to put together a list of concerns people wanted to share with the NYSDOT. Residents helped frame the issues and created the language for comment postcards that will be submitted to the NYSDOT during the public comment period. The comment cards were the beginning of a truly two-way conversation.

We also curated an interactive I-81 exhibit with support from the Onondaga Historical Association. The exhibit traveled to Brooklyn, Albany, and finally ended its tour in Syracuse with a weeklong gallery installation. The exhibit featured archival and current images of the 15th Ward to help tell the story of the neighborhood's past and to inspire attention to the current situation. Interactive screens with more than 500 scanned newspaper stories conveyed the story of the original construction, and included oral testimony from directly impacted residents.

Finally, we held a series of open meetings with members of the Onondaga Nation to understand how past and future construction on the highway impacts the Indigenous community.

Through this process, the NYCLU learned that community members and directly impacted people are seeking more equitable and healthy outcomes for their neighborhoods. They are rightly afraid of being shut out of formal discussions. Many also fear that the expected redevelopment will have negative consequences for years to come. Community members want to see the harms from the original I-81 construction repaired, not just paved over. For example, community members want more Black-owned businesses in their neighborhood.

Broadly, community concerns fall into three categories: future land use and displacement through gentrification; environmental and health issues; and racial and restorative justice, including equal access to educational, economic and employment opportunities.

Building a
Better Future

The I-81 highway has started to deteriorate and must be re-built or replaced. The construction plan that has emerged as the most likely solution is called the community grid. Under this proposal, a portion of the I-81 elevated highway will be removed and replaced by a surface road for local traffic.

The community grid plan[35] will remove a physical barrier that divides the lower-income southeast community from the wealthier University Hill area and suburban communities in the east, north, and west of the city. **It is a necessary step to start to unify Syracuse.**

COMMUNITY GRID DESIGN

If the NYSDOT implements the community grid, they must ensure that previously segregated communities have physical access to the grid. Current designs must be updated to include access points that will allow residents in these segregated areas to easily travel to the business loop, local hospitals, educational institutions, and grocery stores.

The following should be added to the NYSDOT's construction plan:

- A roadway and walkable access points for community members who reside east of Martin Luther King Boulevard.
- A roadway and walkable access points for community members who reside south of Adams Street to Colvin.
- A pedestrian crossing at Almond Street and an extension of Monroe Street from south to east, so residents – including those who live in Syracuse Housing Authority buildings – can easily access wealthier communities as well as the aforementioned business loop, local hospitals, educational institutions, and grocery stores.

FUTURE LAND USE: DISPLACEMENT AND OPPORTUNITIES

The removal of the elevated portion of I-81 will result in the availability of up to 18 acres of vacant and developable land below the overpass, eight acres of which are in direct proximity to the environmental justice community. What is done with the newly available land will be of great consequence to the community.

This land should be managed in a way that ensures economic benefits will flow to the existing community. The area is in close proximity to Syracuse's rejuvenated business district, and there may be those with financial interests who see this as an ideal opportunity for commercial expansion.

A land trust could be established to give community members formal legal authority over future development and to protect it from economic pressures that result from gentrification. Similar land trusts have been established in Albany and Ithaca and could be used as models for the City of Syracuse. Without a land trust in place giving the community control of what happens to the land, those who have experienced disinvestment because of I-81 and who will bear the brunt of construction could be unable to reap the economic benefits of the project.

Careful planning could ensure that people who have lived their lives in the neighborhood are able to stay, engage equitably in the rejuvenation of the community, and begin to build wealth. But without deliberate action, the community grid could also usher in a wave of gentrification that displaces long-time residents, most of whom are low-income families. This gentrification is likely to happen if the eight-acre parcel is devoted only to large commercial growth and market-rate housing. Community members should have control over the eight acres of land, so that they can direct its use for the benefit of their neighborhood. Another concern is that Syracuse University or University Medical Hospital will try to use the land, which could also spur gentrification, causing displacement.

Unfortunately, the NYSDOT's approach to the use of the 18-acre parcel is not encouraging. The preliminary report suggests the land can be used for one- and two-bedroom apartments.[36] This caters to young,

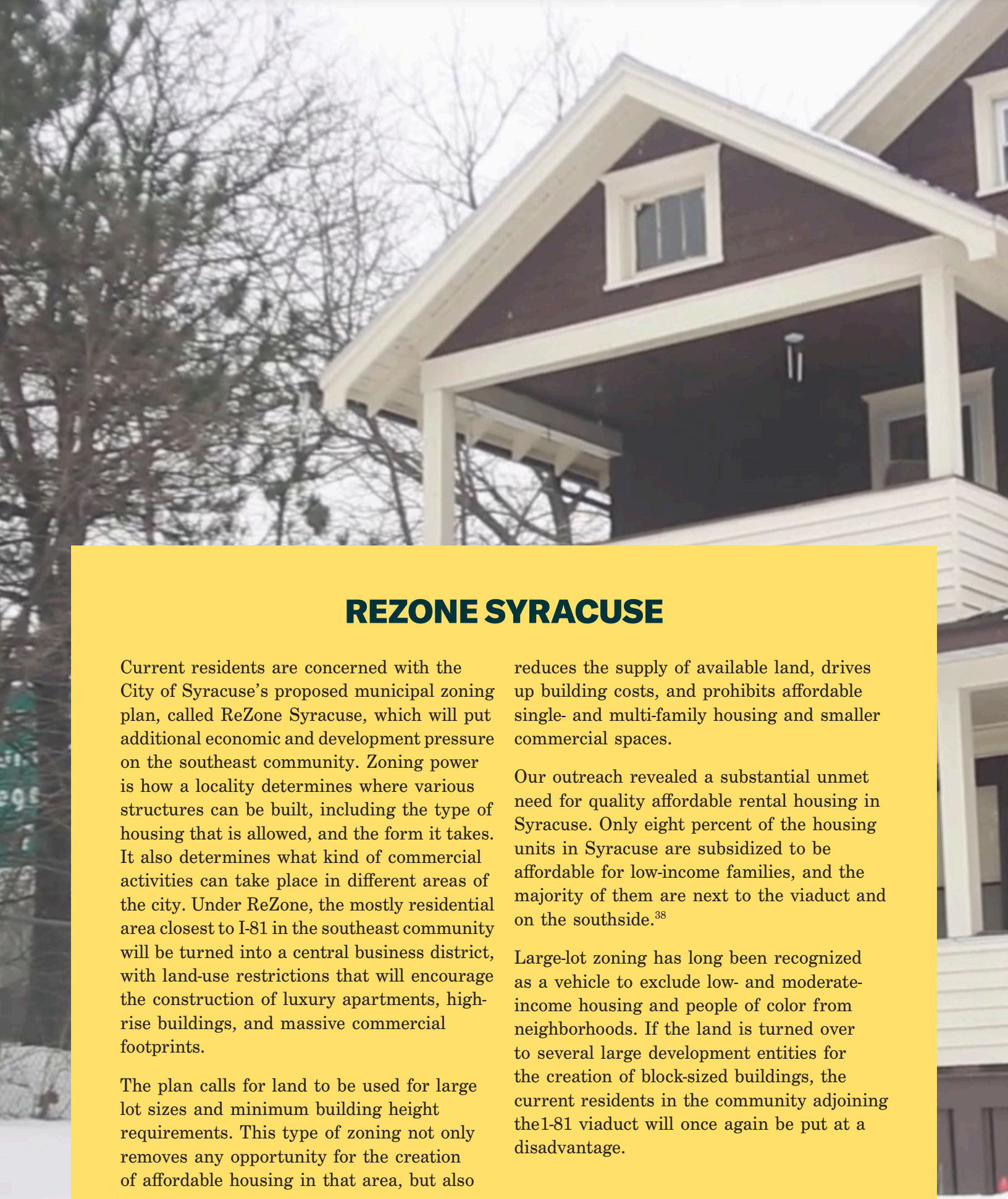
affluent people like professionals and college students, rather than the families who live there now. The land will be particularly attractive to developers because of its proximity to the center of the city – close to universities, hospitals, and a revitalized downtown. One other concern is that new development often brings increasing property values and higher property taxes for current owners, who then raise rents, making housing too expensive for current residents.

Unless this economic pressure is defused, it will force residents out of their homes and they will lose their familiar connections to neighbors. They will also be excluded from the economic development and opportunities in their old neighborhood.[37] Anti-gentrification and anti-displacement measures are critical to protect current owners and residents.

Unfortunately, gestures undertaken by the City and State reinforce the concerns of the community. The City of Syracuse proposes zoning the now-residential neighborhood into an area that only allows for high-density, commercial land use. And at the same time, NYSDOT is renaming the area near the viaduct, calling it a "Business Loop." This sends a strong message to residents that they will be removed from their neighborhoods to make way for luxury high-end apartments and locked out of commercial development.

There is one critical way NYSDOT can help encourage equitable development: attaching conditions to any transfer of the 18-acre parcel of land. The NYSDOT owns this land, and could sell or transfer the land to the City of Syracuse after the project is complete. We recommend the State use this bargaining power to pressure the City to take anti-displacement measures. These measures should include:

- Adopting inclusionary zoning measures to promote the creation of affordable housing.
- Implementing tax abatements and other tools to facilitate homeownership opportunities in the impacted area.
- Creating incentives that require developers to maintain 20 percent of new units at 80 percent of the Area Median Income, with first priority to people residing close to the community grid.



REZONE SYRACUSE

Current residents are concerned with the City of Syracuse's proposed municipal zoning plan, called ReZone Syracuse, which will put additional economic and development pressure on the southeast community. Zoning power is how a locality determines where various structures can be built, including the type of housing that is allowed, and the form it takes. It also determines what kind of commercial activities can take place in different areas of the city. Under ReZone, the mostly residential area closest to I-81 in the southeast community will be turned into a central business district, with land-use restrictions that will encourage the construction of luxury apartments, high-rise buildings, and massive commercial footprints.

The plan calls for land to be used for large lot sizes and minimum building height requirements. This type of zoning not only removes any opportunity for the creation of affordable housing in that area, but also reduces the supply of available land, drives up building costs, and prohibits affordable single- and multi-family housing and smaller commercial spaces.

Our outreach revealed a substantial unmet need for quality affordable rental housing in Syracuse. Only eight percent of the housing units in Syracuse are subsidized to be affordable for low-income families, and the majority of them are next to the viaduct and on the southside.[38]

Large-lot zoning has long been recognized as a vehicle to exclude low- and moderate-income housing and people of color from neighborhoods. If the land is turned over to several large development entities for the creation of block-sized buildings, the current residents in the community adjoining the1-81 viaduct will once again be put at a disadvantage.

Preventing More Environmental Racism

A major concern for residents who live near I-81 is the fear of spending the rest of their lives dealing with the environmental impacts of construction. This includes air and noise pollution, lead exposure, and other burdens of living close to, or directly in the path of, a major construction project. At the same time, residents have reason to believe they will be excluded from construction-related jobs and economic benefits.

This section covers both broad topics like air pollution, noise pollution, and job opportunities, as well as specific sites of concern, like STEAM at Dr. King Elementary School and Wilson Park. But each of these sections address critical areas of environmental injustice, where government decisions can play a major role in either repairing past wrongs or inflicting more pain on this community.

AIR POLLUTION

The presence of increased air pollution and exposure to airborne toxins is a primary concern for residents. The NYSDOT has concluded that regulatory limits for air pollution will not be exceeded.[39] But this should not be the standard to which the NYSDOT holds the I-81 project. The Department must instead make public whether the communities closest to the I-81 highway will be exposed to disproportionate or higher rates of air pollution compared to other communities.[40]

The City of Syracuse has asthma rates that are higher than the state average, and respiratory disease is especially prevalent for Black people in the region.[41] [42] This indisputable fact must be acknowledged when considering a massive construction project in a densely populated residential neighborhood.

The people who will be most impacted by the construction need a comprehensive and targeted analysis that goes beyond looking at the regulatory thresholds for harmful chemicals. Further guidance, abatement, and mitigation efforts need to be implemented in order to understand the impacts on highly vulnerable residents, including young people, the elderly, and those with respiratory illnesses.

NOISE POLLUTION

Southside residents will soon have to contend with near constant noise and disruption from the construction project. This noise is not merely an inconvenience; it will impact people's health and well-being.

Noise pollution has a host of negative effects including sleep disturbance, increased heart rate, elevated blood pressure, cardiovascular disease, and hearing loss.[43] Chronic noise is also associated with non-health related impairments, including deficits in cognitive development in children, reduced reading comprehension, and classroom behavior problems.[44] [45] [46] According to the EPA, inadequately controlled noise presents a growing danger to the health and welfare of people, particularly in urban areas.[47]

The City of Syracuse's noise ordinance for construction allows for standard work operations to take place between 7 a.m. to 9 p.m. Monday through Saturday, with restrictions outside those times, including all day Sunday and holidays. While this is a standard local ordinance, it will not adequately protect the residents who will be subject to construction during this period for up to 14 hours each day and six days a week.

Despite the well-documented harms of noise, residents know little about how noise will be abated when construction starts on the I-81 viaduct. And what the NYSDOT has said on this issue raises questions. For example, the NYSDOT preliminary report proposes a "hotel voucher program for adjacent residents when noise activities might occur at night or over the weekend."[48] This implies that construction noise could violate even the very permissive Syracuse ordinance, and that residents could be relocated to hotels during those times. The NYSDOT also does not address what will be done to mitigate noise pollution during the peak hours of 7 a.m. to 9 p.m. This is especially concerning because many members of this community reported working service jobs and non-traditional hours, including nights and weekends. These are jobs that may require sleeping during the day.

Further, this hotel voucher proposal does not account for the burdens that come from abruptly moving families, including children, into hotels. The NYSDOT says nothing about how residents will get to school or work, especially if they rely on public transportation.

The NYSDOT has not done an in-depth, targeted analysis for noise abatement that accounts for these and other concerns that arise from a years-long, massive construction project. They have failed to educate the public about the importance of noise abatement or the options for achieving it.

In fact, on the question of a noise wall, the Department seems to have done the absolute least it could get away with: it sent a mailer to residents that included a ballot to vote "yes" or "no" for a dull grey concrete wall. The NYSDOT did not include context or information about the impacts of noise pollution. It didn't present any other options for abatement, essentially making the decision for the community: take this wall or take nothing. This is a vivid example of NYSDOT's lack of regard for community input.

The NYSDOT must work collaboratively to address and prevent harm from noise pollution. It must survey residents to determine the best hours for noisy construction. And it must propose meaningful noise abatement options based on community feedback.

WILSON PARK

The proposed construction plan's impact on Wilson Park is a major worry for residents. It is the only neighborhood park for people who live in the immediate vicinity of the I-81viaduct, and it is the one place people can go to swim in the public pool, play basketball, or take part in neighborhood programs offered at the on-site community center.

According to the preliminary report, much of the park is slated to be used as a staging site for storing construction equipment and other hazardous material.[49] The NYSDOT plans to close a portion of the park, including the basketball courts and some of the grass area, while leaving the rest of the park open during construction. The NYSDOT also plans to construct a replacement recreational facility on the western edge of the park.

This plan devalues the people who live in this community by exposing them to harmful dust, debris, and other dangerous materials, with no governmental oversight. A park cannot remain open while it serves as the staging ground for a massive construction project without putting people at risk. It is difficult to imagine children in a wealthy neighborhood being expected to play in the grass inches from a major $2 billion multi-year construction project. But in this neighborhood, with a high concentration of poverty where the majority of residents are Black, that is exactly what the preliminary report is proposing.

Instead, the NYSDOT must provide government oversight of the entire project, ensure no one neighborhood is overburdened with staging sites, and offer a different staging site for the project. If that does not happen, Wilson Park must be completely closed, and another recreation area must be constructed within walking distance.

STEAM AT DR. KING ELEMENTARY SCHOOL

Community members are concerned about what the I-81 project will mean for the students who attend STEAM at Dr. King Elementary School and, more broadly, how the I-81 project will impact the community's access to quality education.

First, the health, safety, and future of approximately 550 students who attend Syracuse's STEAM at Dr. King Elementary School are in immediate risk of irreparable harm from the I-81 project. The school sits within feet of the viaduct and the NYSDOT plans to install an access ramp in close proximity to the school grounds.[50] Second, without careful planning, gentrification of the neighborhood may mean a wave of changes to the school community that comes at the expense of the needs of longtime residents.

HEALTH AND SAFETY

The viaduct created decades of pollution. Now the project to replace it threatens to once again fill the air surrounding STEAM at Dr. King Elementary School with environmental toxins.

It has long been established that schools with larger percentages of low-income students and students of color are exposed to greater respiratory hazards from air toxins than schools with more white students. This is a well-recognized form of environmental racism. One study showed that ZIP codes with majority Black residents tend to be close to sources of pollution like highways. Nationally, Black children are six times more likely to die from asthma than white children.[51] About 80 percent of the students at STEAM at Dr. King Elementary School are Black, and approximately 99 percent are economically disadvantaged.[52] This places the students at STEAM at Dr. King Elementary School in a particularly vulnerable spot.

Pollutants emitted from highways and construction sites pose a risk to anyone who breathes them, but they are especially harmful to young people. Children exposed to vehicle pollution suffer higher rates of hospitalizations, impaired lung development and lung function, asthma, childhood leukemia, cardiovascular disease, and premature death.[53] [54] [55] [56]

Air pollution does not just affect physical health; it is intimately tied to many aspects of academic performance as well. Children exposed to roadway pollution have a higher likelihood of performing worse on cognitive functioning tests, having impaired neurological functions, lower IQ scores, and missing more school days compared to other children. A recent study found that installing air filters in school buildings resulted in measurable math and reading improvements.[57]

The ailments brought on by air pollution can cause students to miss school, and those who are chronically absent are more likely to drop out. In a survey, 51 percent of New York school nurses felt asthma was more disruptive to school routines than any other chronic condition.[58]

Since at least 2011, the EPA has warned school districts about the dangers of traffic pollution to children. The EPA recommends that school districts think carefully before picking sites for schools near major roads or truck routes.[59] This is because, as the EPA explains, students who attend schools less than 500 to 600 feet downwind from heavily traveled roadways can suffer serious negative consequences from vehicle pollution.[60] As a result, 17 states now regulate the siting of schools near major roadways. Seven of them either prohibit building schools near major roadways, require extensive mitigation of noise and air pollution, or both.[61]

Until this year, STEAM at Dr. King Elementary School was designated a "struggling school" because of persistently low scores on state tests. The school has a math proficiency rating of five percent and a reading proficiency of four percent, compared to state averages of 49 and 46 percent respectively.[62] On all testing, only 25 percent of third graders, 21 percent of fourth graders, and 19 percent of fifth graders received passing scores.[63]

It is little wonder that the students attending the school and the educators working there have been deemed "failures" by the State. However, the true failure is that City and State governments allow young children to attend school next to a busy highway, putting their health and education at risk. Similarly, the NYSDOT has failed to develop a specific mitigation and protection plan for students, teachers, and families. Parents, faculty, and staff are especially concerned with the NYSDOT's proposal to place a highway access ramp just 250 feet from the school.[64] Yet despite all of this, the NYSDOT incredibly claims no school will be impacted by the I-81 project.

Removing the viaduct and replacing it with the community grid is a good first step towards protecting students. However, the NYSDOT's replacement plan ignores EPA guidance about school proximity to traffic pollution as well as decades of research about the negative effects suffered by students who attend schools near a major roadway.

The highway access ramp must be moved at least 600 feet from STEAM at Dr. King Elementary School, and a better plan must be developed that includes intensive mitigation strategies to protect students at the school. The school building must be provided with a high-quality air filtration system to ensure children have clean air to breathe now and in the future. There must also be noise mitigation strategies, insulated walls, and a plan to ensure children who walk to school will not have their pathways blocked by equipment or materials.

Finally, a serious plan for STEAM at Dr. King Elementary School must consider whether the student body would be safer and healthier being moved elsewhere for the duration of the project—and that question must be answered with heavy input from families.

It will take a lot of work to do this well, which is something the students deserve. They can no longer be an afterthought.

SEGREGATION AND GENTRIFICATION

Community members are concerned that commercial growth will result in changes to STEAM at Dr. King Elementary School that prioritize the desires of newly arriving families, instead of the needs of longstanding residents.

Currently, the Syracuse City School District has a student population of about 19,000 students, approximately 22 percent of whom are white and 49 percent are Black.[65] STEAM at Dr. King Elementary School has a student body that is 80 percent Black, but redevelopment and changes to the character of the neighborhood could drastically alter that composition.

There is an obvious need to undo the racial segregation created by redlining in Syracuse and enforced by the viaduct. However, integration should not be confused with gentrification. A more diverse neighborhood and school may give the appearance of integration but it will not necessarily level the playing field for Black students, or provide better access to a great education for everyone. Black students who attend STEAM at Dr. King Elementary School must not be displaced from their school as white families move in.

It is essential that gentrification does not displace students or marginalize current residents' role in their community's education system. Current residents must retain priority access to STEAM at Dr. King Elementary School and have a substantial role in determining the policies, practices, and culture of the school and the broader school system. In addition, revenue generated from community development should be used to increase school funding. This should be done in an equitable manner, with an eye toward redressing the impacts of longstanding underfunding on current students and families.

Current students and residents are facing the brunt of the risk of the I-81 project. They must enjoy the benefits of its completion.

ECONOMIC OPPORTUNITY

The initial construction of I-81 contributed significantly to the loss of business in the southeast community. Now, the project to replace the highway will create good-paying jobs in an area that needs them the most. Those jobs must go to the people most impacted by the construction. These types of site-specific employment requirements have been used by Departments of Transportation in other parts of the country and must be implemented here.[66]

First on the list of those who should be prioritized for jobs should be Syracuse's Black residents, who live in close proximity to the I-81 viaduct. More broadly, these jobs must go to Syracuse residents – 45 percent of whom are people of color.[67]

Unfortunately, a look at who currently holds construction jobs in the Syracuse area is cause for concern. A report by the Urban Jobs Task Force and Legal Services of Central New York looked at recent construction projects in the Syracuse area and found that 88 percent of workers on the construction sites were white.[68] Additionally, the report found evidence that a very low percentage of workers lived in Syracuse. Nearly all road construction jobs go to white people from outside the city.

For the I-81 project to be different, the NYSDOT must be intentional and innovative. The Urban Jobs Task Force released a set of recommendations with ideas for exactly how to do this.[69] The recommendations include increasing access to training and apprenticeships, and requiring construction unions to draw workers from among Syracuse residents, specifically communities of color. We cannot ask those who live close to the highway – who will have to endure all of the hardships of a major construction project – to navigate even more obstacles while the economic benefits of construction flow to white people who live outside of Syracuse.[70]

The NYSDOT must show preference to construction companies who are meeting set diversity markers such as employing and training residents who live in the impacted area, hiring a diverse staff including Black employees, and implementing training and hiring programs specifically for Syracuse residents.

Recommendations

The challenges that exist in the southeast community adjacent to the I-81 viaduct did not crop up because of singular decisions. They represent the concrete outcomes of widespread structural racism and environmental injustice. Actions by all levels of government have contributed to highway placement, school underperformance, food insecurity, respiratory disease, lead exposure, racial isolation, and concentrated poverty. These are examples of cumulative impacts and indirect effects that the NYSDOT is required to consider under NEPA, SEQR, Title VI and the Executive Order 12898.

In order to met the legal standard of equity, efforts to remedy these issues must involve the removal – not just the management – of environmental and economic harms. Doing this will go a long way toward repairing the neighborhoods and families that have been discriminated against by the City of Syracuse for generations.

The following recommendations will help ensure compliance with federal and state laws that have been established to protect the environment and the people who live there.

PROTECT FUTURE LAND USE

It is imperative that the history of redlining, urban renewal, and displacement in Syracuse that has disproportionately hurt Black neighborhoods does not repeat itself. To this end, **land use and land transfer policies must be put in place to restore and enhance communities impacted by I-81 both during and after construction.**

NYSDOT must **create a land trust for the eight acres directly east of Martin Luther King Boulevard** giving preference for development to residents connected to the community, those who have a history in the neighborhood and those past residents impacted by the original construction of I-81.

Additionally, the **NYSDOT must conduct a new analysis of land use**, development patterns, and housing trends. The claim that the eight acres adjacent to Martin Luther King Boulevard will be best used for one- and two-bedroom apartments must be reassessed.

PROTECT HEALTH AND WEALTH

The NYSDOT must **create a meaningful solution for residents who will be impacted by lead exposure, and air and noise pollution**. Doing this will go a long way toward repairing the neighborhoods and families that have been overburdened by toxins in this community for generations.

The NYSDOT must **accommodate residents who would like to relocate** to avoid conditions that may be hazardous to their physical or mental health, or their ability to engage in essential functions. Vouchers that allow people to stay at a hotel are inadequate.

The NYSDOT must **conduct a cumulative exposure analysis for residents who live in the communities within 600 feet of the viaduct** to determine what environmental hazards have been embedded in their soil, houses, paint, and bodies. This analysis should look at air, noise, and lead pollution.

The NYSDOT must **work collaboratively with residents to ensure this community is not harmed by noise pollution**. It must survey the community to determine the best hours for disruptive construction. And it must propose specific noise abatement techniques, based on community feedback including a variety of noise walls.

The NYSDOT **must not use Wilson Park as a staging site for construction**. Failing that, Wilson Park must be completely closed, and another recreation area must be constructed within walking distance.

The NYSDOT must **create a Community Restoration Fund** for communities that have had their health and wealth impacted by the decades of pollution from I-81. Portions of the fund must be used to eliminate existing environmental hazards.

ACCESS TO OPPORTUNITY

The **jobs generated by the project must go primarily to the people who live directly adjacent to the viaduct**, and those residents must receive the training necessary to perform those jobs. Preference for contracts should go to unions whose employees are at least 30 percent people of color and who show a preference for employees who live near the I-81 viaduct.

All residents must have an automatic right to return when the construction directly impacting their homes ends. Additionally residents must be provided with the necessary upgrades, if they decide to stay in their current homes, to protect from construction hazards, including insulation, new windows, and air conditioners.

With input from the community, the NYSDOT must **offer market-rate buyouts, rent subsidies, and/or temporary relocation assistance** to households in areas determined to be highly impacted by the construction.

An **easement reassessment must be conducted** so that renters receive easement payments if they lose access and partial enjoyment of their homes during construction. Nearly 84 percent of households in the community impacted by the project are occupied by renters.[71] But easement payments are offered only to homeowners. Payments must be given to anyone who loses use of their property—whether they are the owner or a renter.

Finally, NYSDOT must **provide governmental oversight on all aspects of this project**; it cannot leave day-to-day decisions to contractors. Additionally, disposal and staging sites must not overburden this community.

PROTECT SCHOOL CHILDREN

Perhaps no population will be impacted more directly by this project than the 550 students at STEAM at Dr. King Elementary School.

The NYSDOT must **provide oversight to create a comprehensive construction plan** in collaboration with parents, faculty and staff at the Syracuse City School District. It must contain specific ways to mitigate noise and air pollution both during and after construction, including:

- Installing air ventilation and filtration systems, soundproofing, and insulation.
- Creating safe walking and cycling zones.
- Implementing regulations on construction vehicles idling and parking near the school.
- Ensuring parking access for school busses, parents' vehicles, and public transportation.
- Limiting work during school hours.
- Removing hazards in a timely manner.
- Designating play zones during construction.

The NYSDOT must also **move the proposed highway access ramp so it is at least 600 feet from STEAM at Dr. King Elementary School**.

As part of the project, Syracuse City School District must work closely with the NYSDOT, parents, and students to **ensure that gentrification does not displace students at STEAM at Dr. King Elementary School**.

Conclusion

Our recommendations will assist the NYSDOT in meeting its own stated goals for the project. These include enhancing economic growth and vitality in the City, re-connecting the Syracuse community, and providing better access to jobs, businesses, and services in downtown Syracuse and beyond.[72]

Overall, the path laid out in this report offers a chance to right a historic wrong and to create more equitable outcomes for the entire region.

NOTES

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EXHIBIT B

University at Buffalo
Clinical Legal Education
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FROM:	Dan Piersa, Lead Student Attorney
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	Environmental Advocacy Clinic
	Supervised by Professor Kim Diana Connolly, Esq.
DATE:	13 October 2021
RE:	**Comments and Recommendations** **I-81 Viaduct Project Draft Design Report/** **Draft Environmental Impact Statement (DDR/DEIS)**

This document reflects the culmination of a review of the more than 28,000-page I-81 Viaduct Project Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) by the University at Buffalo School of Law's Environmental Advocacy Clinic. We provide comments and recommendations on environmental aspects of the assessment presented in that document issued in July of this year by the Federal Highway Administration (FHWA) and the New York State Department of Transportation (NYSDOT).

It is our hope that these comments can assist FHWA and NYSDOT in strengthening the I-81 Viaduct Project Plan to benefit community members and other stakeholders. Please feel free to contact us at law-environmentalclinic@buffalo.edu should you have any questions.

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General Comments

1. Introduction

The UB's Environmental Advocacy Clinic has been asked to review The National Environmental Policy Act (NEPA) and environmental issues, for the New York Civil Liberties Union (NYCLU). The NYCLU believes that three concepts of justice in the DEIS are inadequately addressed: Environmental Justice, Economic Justice, and Racial Justice.[1]

This Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) (collectively DEIS) is a marked improvement over the pre-DEIS. However, the July 2021 DEIS is not yet adequate from an Environmental Justice perspective. By identifying the Community Grid Alternative as the preferred alternative, the DEIS, its preparers, and all contributors and stakeholders have made a nationally significant stride in advancing Environmental Justice. The Federal Highway Administration (FHWA) and the New York State Department of Transportation's (NYSDOT) (collectively Lead Agencies) recommendation of fundamentally changing a half-century-year-old traffic pattern is commendable in its commitment to value people over precedent.

The Community Grid Alternative has the potential to remedy the injustice faced by the old 15th Ward in Syracuse that was bisected by the I-81 viaduct. A huge physical barrier will be removed, and this part of Syracuse has the potential to grow together once again, strengthening the Syracuse community as a whole and demonstrating that the ills of the past can be ameliorated. Additionally, the I-81 Community Grid Alternative will have other significant impacts on the transit-ability, livability, and viability of this part of Syracuse. Done right, the I-81 Viaduct Project could serve as the model for reimagining and rebuilding the Black, Brown, Indigenous, and Asian communities disrupted by Urban Renewal in the mid-twentieth century. Therefore, the goal of FHWA and NYSDOT should be to set the best, and most just, example that they can.

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[1] NEW YORK CIVIL LIBERTIES UNION, *Building a Better Future: The Structural Racism Built into I-81, and How to Tear it Down* (Dec. 2, 2020), https://www.nyclu.org/en/publications/building-better-future.

Committing to Environmental Justice mandates that decisionmakers are dedicated to a healthy, sustainable, safe, productive, and livable environment for all. Environment includes ecological (biological), physical (natural and built), social, political, aesthetic, and economic environments. To be just, environmental conditions must respect and fulfill individual and group identities, needs, and dignities in such a way as to provide for individual and community empowerment. This approach recognizes that environmental "injustices" can exist not simply in the past, but continue into the present, and calls for appropriate actions to address them.

The Lead Agencies have a duty to consider Environmental Justice within the intersection between NEPA, President Clinton's Executive Order 12,898,[2] and the current commitment to Environmental Justice being underscored by the Biden Administration in its Executive Orders (E.O.) and proposed regulatory changes.[3] Although NEPA's historical regulatory requirements have been muddied because of the recent transition to a new administration,[4] the dedication to environmental justice is stronger than ever.

On October 6, 2021, the Biden Administration's Council on Environmental Quality issued a Notice of Proposed Rulemaking (NOPR).[5] The NOPR indicates intent to reverse key aspects of the Trump NEPA changes, including once again requiring Lead Agencies to consider the indirect and cumulative effects of major actions, such as

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[2] Exec. Order No. 12,898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 59 Fed. Reg. 7629 (Feb. 1994), https://www.federalregister.gov/documents/1994/02/16/94-3685/federal-actions-to-address-environmental-justice-in-minority-populations-and-low-income-populations.

[3] *See* Exec. Order No. 13,990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, 86 Fed. Reg. 7037 (Jan. 2021), https://www.federalregister.gov/documents/2021/01/25/2021-01765/protecting-public-health-and-the-environment-and-restoring-science-to-tackle-the-climate-crisis.

[4] The Trump Administration's regulatory changes to the NEPA process were an attempt to make an infamously slow and cumbersome process more "efficient" and user-friendly. Among changes to time limits and page limits, the Trump Administration's NEPA regulatory amendments revised how NEPA defined "effects" by removing the longstanding requirement to analyze indirect and cumulative effects of a proposed project. Sharon Buccino, *Understanding Trump's Harmful Attack on NEPA*, NRDC (Jul. 15, 2020), https://www.nrdc.org/experts/sharon-buccino/understanding-trumps-harmful-attack-nepa.

[5] National Environmental Policy Act Implementing Regulations Revisions, 86 Fed. Reg. 9754 (proposed Oct. 7, 2021) (to be codified at 40 C.F.R. pts. 1502, 1507, and 1508), https://www.federalregister.gov/documents/2021/10/07/2021-21867/national-environmental-policy-act-implementing-regulations-revisions.

highway projects.[6] Along with guidance mentioned below, this is the clearest sign yet that the Biden Administration prefers and is actively pursuing a more robust NEPA process which centers Environmental Justice.

These recent executive actions are not all that must be considered. Under President Clinton's E.O. 12,898, federal agencies are mandated to identify and address the disproportionately high and adverse human health and environmental effects of their actions on minority and low-income populations.[7] This analysis has historically required a thorough evaluation of indirect and cumulative impacts in almost all cases. We recommend that in the Final Environmental Impact Statement (FEIS), the Lead Agencies do deeper analyses that pushes Environmental Justice even further.

In addition to these sources, President Biden's Administration, and myriad environmental justice experts, have offered guidance that reflects widespread commitment to furthering the concept of Environmental Justice.[8] These expert opinions encourage the Lead Agencies to embrace principles of justice and inclusivity. President Biden's E.O. 14,008 states:

> It is . . . the policy of my Administration to secure environmental justice and ensure economic opportunity for disadvantaged communities that have been historically marginalized and overburdened by pollution and underinvestment in housing, transportation, water and wastewater infrastructure, and health care.[9]

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[6] Joseph Morton, *White House Moves to Restore Environment Reviews Eased by Trump*, ROLL CALL, (Oct. 6, 2021), https://www.rollcall.com/2021/10/06/trump-environmental-reviews/.

[7] Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, Exec. Order No. 12,898, 59 Fed. Reg. 32 (Feb. 16, 1994), https://www.federalregister.gov/documents/1994/02/16/94-3685/federal-actions-to-address-environmental-justice-in-minority-populations-and-low-income-populations.

[8] See, e.g., Examining Current Issues Adversely Affecting Environmental Justice Populations: Before the Subcomm. on Chem. Safety, Waste Mgmt., Env't Just. & Regul. Oversight of the S. Comm. On Env. & Pub. Works, 117th Cong. 3 (2021) (opening remarks of Sen. Jeff Merkley, Chairman of Subcomm. on Chem. Safety, Waste Mgmt., Env't Just. & Regul. Oversight), https://www.epw.senate.gov/public/index.cfm/2021/7/examining-current-issues-adversely-affecting-environmental-justice-populations; see also Nina M. Hart & Linda Tsang, ADDRESSING ENVIRONMENTAL JUSTICE THROUGH NEPA 1 (Cong. Rsch. Serv. 2021), https://crsreports.congress.gov/product/pdf/LSB/LSB10590.

[9] Exec. Order No. 14,008, Tackling the Climate Crisis at Home and Abroad, 86 Fed. Reg. 7619 (Jan. 27, 2021) https://www.federalregister.gov/documents/2021/02/01/2021-02177/tackling-the-climate-crisis-at-home-and-abroad.

Echoing and reinforcing the Administration's Environmental Justice stance, Council on Environmental Quality Chair Brenda Mallory has stated, "The Biden-Harris Administration's focus on environmental justice aims to address racial and economic disparities in environmental quality."[10] These words offer permission, if not direction, to push the envelope of Environmental Justice further than ever before. It is imperative that governmental action such as the I-81 Viaduct Project consider and protect as much as possible those who have been historically marginalized and left out of the decision-making process.

As prominent environmental justice scholar, Robert Bullard, observed in 2019, "[w]hen you don't protect the least in your society you place everybody at risk… Justice will say, let's do fairness, equity and justice to make sure that we do not somehow say just because you live in a low-income neighborhood that you don't deserve to have a park, a grocery store and flood protection."[11] The FEIS should protect all who will be living and working near the I-81 Viaduct Project area.

The Biden Administration has promised the "Administration will chart a new and better course, one that puts environmental and economic justice at the center of all we do."[12] The Administration has also stated its commitment to "listen to and learn from impacted communities and those who have been on the front lines."[13] The I-81 Viaduct Project provides the Lead Agencies the opportunity to walk the talk of the Presidential Administration.

The entirety of these comments provides detailed suggestions as to how to achieve environmental, racial, and social justice. In addition to the Detailed Comments below, the authors focus on issues raised by the roundabout, returning the land, and avoiding

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[10] Brenda Mallory, *Renewing the Pursuit of Environmental Quality*, EARTH DAY BLOG (Apr. 22, 2021), https://www.whitehouse.gov/ceq/news-updates/2021/04/22/renewing-the-pursuit-of-environmental-quality/.

[11] CLIMATE ONE *Dr Robert Bullard: The Father of Environmental Justice*, (Dec. 12, 2019), https://www.climateone.org/audio/dr-robert-bullard-father-environmental-justice.

[12] Shalanda Young et al., *The Path to Achieving Justice40,* THE WHITE House (July 20, 2021), https://www.whitehouse.gov/ceq/news-updates/2021/07/20/the-path-to-achieving-justice40/.

[13] *Id.*

and mitigating lead poisoning. A summary of these key areas is provided in the following section.

2. Re-working Placement and Other Aspects of the Roundabout Would Convincingly Demonstrate Care for the Community

To ensure Environmental Justice is reflected in the FEIS requires the placement of the roundabout to be redesigned. The roundabout planned in the proximity of STEAM at Dr. King Elementary School at 416 E. Raynor Ave must be redesigned. Historically, the children who attend STEAM at Dr. King Elementary School have borne the disparate burden of air pollution from being so close to the viaduct.

Studies show traffic pollution causes asthma attacks in children and may cause a wide range of other effects including the onset of childhood asthma, impaired lung function, premature death, and death from cardiovascular diseases. These studies indicate that the adverse effects have been observed as far as approximately 1,500 feet from high-traffic areas.[14] Community knowledge reveals children at the school have higher than average rates of asthma due to the traffic air pollution.[15] The replacement of the viaduct with the roundabout will not do enough to mitigate traffic air pollution at this site. Although fewer cars are projected to traverse this section of roadway than while the viaduct stands, the close proximity of the cars will still deteriorate the air quality at the school and cause noise pollution. The roadway, projected to carry more than 30,000 vehicles per day, must be reimagined. It should be at minimum 600 feet away from STEAM at Dr. King Elementary School.[16]

In 2019, a LOCALIZE.CITY report confirmed that hundreds of New York City public schools are located within 500 feet of major highways. Such locations expose school children to very high levels of air pollution according to the Environmental Protection Agency

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[14] AM. LUNG ASS'N, *Living Near Highways and Air Pollution* (Jan. 5, 2021), https://www.lung.org/clean-air/outdoors/who-is-at-risk/highways.

[15] Madison Moore, *Residents Recount Deeply Personal Memories at I-81 March for Justice*, LOCAL SYRACUSE (Aug. 15, 2021), https://www.localsyr.com/news/local-news/residents-recount-deeply-personal-memories-at-i-81-march-for-justice/.

[16] Jennifer Heissel et al., *Does Pollution Drive Achievement? The Effect of Traffic Pollution on Academic Performance,* NAT. BUREAU OF ECON. RSCH. (Jan. 2019), https://www.nber.org/papers/w25489 (finding adverse effects on school-age children when major highway was within 250 meters [about 820 feet] of a school).

(EPA).[17] The relied-upon guidance from the EPA states specifically that heavily traveled roadways can negatively impact air quality within about 500-600 feet away when conditions such as wind, traffic, time of day, and others align.[18] The EPA singles out certain traffic activities, such as stop-and-go movement, rush hour, and morning commutes as having particularly negative effects on nearby air quality.[19] The proposed roundabout brings these afore-mentioned dangers within 150 feet of STEAM at Dr. King Elementary School every school day as children are dropped off and commuting children and their parents clog the roundabout. The EPA's guidance on the danger of roadways to air quality is clear, and pursuant to that guidance, the roundabout must be moved at least 600 feet from the school.

Additionally, high levels of traffic near schools pose a physical danger to students. In the United States, roughly 75 percent of school-age children are taken to school via vehicle.[20] Traffic congestion near schools is already an issue due to this fact without the placement of a roundabout facilitating more than 30,000 vehicles nearby. Logically, the more vehicles within close proximity to a school, the higher the risk and incidence of traffic-related injuries.

The Detailed Comments section will explore this matter further.

3. Returning the Land to the Dispossessed Community Would Set a Strong Environmental Justice Precedent

To ensure Environmental Justice is reflected in the FEIS, the return of land to dispossessed communities should be explored. In DEIS Section 6-2-3: Environmental Justice, it is stated that:

> NYSDOT would form a land use working group consisting of representatives from the city, the city's school district, economic development and economic opportunity organizations, the business

[17] Valeria Ricciulli, *Major NYC Schools Are Located Near Major Highways, Raising Pollution Concerns: Report*, CURBED NEW YORK, (Sept. 3, 2019), https://ny.curbed.com/2019/9/3/20847417/back-to-school-nyc-public-doe-pollution-highways.

[18] EPA OFF. OF TRANSP. & AIR QUALITY, *Near Roadway Air Pollution and Health: Frequently Asked Questions*, (2014), https://www.epa.gov/sites/default/files/2015-11/documents/420f14044_0.pdf.

[19] *Id.*

[20] Nancy La Vigne, *Traffic Congestion Around Schools*, ARIZ. ST. UNIV. CTR. FOR PROBLEM-ORIENTED POLICING (Aug. 2007), https://popcenter.asu.edu/content/traffic-congestion-around-schools-0.

> community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate, to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel.[21]

The FEIS should go further. The Lead Agencies should commit to returning the land to the community, in the form of a land trust or by guaranteeing benefits to the community in the form of a community-benefits agreement. The land was taken from the community at the inception of the I-81 viaduct when nearly 1,300 residents were displaced by construction.[22] The Federal Interstate Highway Program's displacement, land appropriation, and resulting segregation have contributed to the immense wealth disparity between white and Black families today. Working in devilish tandem with redlining, interstate highways were built to physically separate Black communities from downtown areas, white communities, and each other, leading to a breakdown in property values and an inability to accumulate intergenerational wealth for Black families.[23] In *The Color of Law*, Richard Rothstein notes:

> [M]edian white household wealth (assets minus liabilities) is about $134,000, while median [B]lack household wealth is about $11,000—less than 10 percent as much . . . African American families today, whose parents and grandparents were denied participation in the equity-accumulating boom of the 1950s and 1960s, have great difficulty catching up now.[24]

Rothstein acknowledges that disparate racial housing policy attributes a "good proportion" of this "enormous difference," but the racist governmental policies in the United States in the twentieth century layered upon one another, result in exacerbating the raw deal that Black Americans still contend with.[25] Racist housing policies and redlining did not afford the same opportunities to Black people that white people got to move to suburbs, buy newly built homes, and appreciate equity over the ensuing

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[21] July 2021 I-81 Viaduct Project DDR/DEIS (hereinafter DDR/DEIS) Section 6-2-3, 6-96.

[22] *I-81 Syracuse, New York*, CONG. FOR THE NEW URBANISM, https://www.cnu.org/what-we-do/build-great-places/i-81(last visited Oct. 5, 2021).

[23] RICHARD ROTHSTEIN, THE COLOR OF LAW: A FORGOTTEN HISTORY OF HOW OUR GOVERNMENT SEGREGATED AMERICA 128-9, 182 (2017).

[24] *Id.* at 184-5.

[25] *Id.* at 185.

decades.[26] Instead, Black people were segregated legally, financially, and physically and then built right through, destroying property rights and property value further.

Since the original project took the land without reserve, the current I-81 Viaduct Project should remedy this historical injustice and give land back to the community. This proposed action would be a positive step forward in the Administration's commitment to "address racial and economic disparities in environmental justice."[27]

Moreover, the current proposed use of the land is problematic in that it is more susceptible to inducing gentrification than if the community is allowed to develop their land as they see fit. "[T]he city's 'economic development and economic opportunity organizations,'" and "the business community" may not have the community's best interests in mind.[28] Rochester recently replaced its Inner Loop highway with an at-grade boulevard.[29] Notable—and remarkable—as one of the first removals of an Urban Renewal highway in the United States, development of the new boulevard has been criticized as bringing in "too many higher-end apartments."[30] Gentrification is a clear danger in the destructive aftermath of Urban Renewal. The best way to avoid it, and to begin to remedy the wealth gap created by Urban Renewal's taking of property when developing, is to give the land back to the community it was taken from. The FEIS should commit to returning the land to the community from which it was taken.

The Detailed Comments section will explore this matter further.

4. Lead Poisoning is a Classic Indicator of an Environmental Justice Community and the DEIS Inadequately Addresses It

In pursuit of Environmental Justice, the FEIS needs to include a more complete analysis of potential lead poisoning dangers and make an explicit commitment to employing the most modern lead-safe practices to keep the workers and the community safe. Increased exposure to lead and the presence of elevated blood lead levels, especially in

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[26] *Id.*

[27] *Supra* note 10.

[28] DDR/DEIS Section 6-2-3, 6-96.

[29] Nadja Popovich et al., *Can Removing Highways Fix America's Cities?*, N.Y. TIMES (May 27, 2021), https://www.nytimes.com/interactive/2021/05/27/climate/us-cities-highway-removal.html.

[30] *Id.*

children, is a paradigmatic burden faced by environmental justice communities. People of color and low-income persons typically live in older housing stock that place them in closer proximity to lead in the forms of chipped and peeling paint. [31] People can also be exposed to lead through old water pipes, especially when construction causes heavier traffic to shake underground pipes.[32] Data available show that there are many lead pipes in the immediate vicinity of the I-81 Viaduct Project Central Study Area.[33] The preferred Community Grid Alternative will see construction that will potentially disturb these lead pipes leading to acute spikes in lead exposure in the surrounding community.

The Biden Administration has highlighted the importance of mitigating lead exposure in environmental justice communities. Candidate Joe Biden's website notes his commitment to fund "replacing and remediating lead services lines and lead paint in households, daycares, and schools".[34] In its current state, the DEIS does not sufficiently address the potential hazards surrounding lead exposure, nor does it adequately describe any mitigation efforts that will take place to ensure that the people in this community will not be exposed to lead. It is essential that the FEIS do a significantly more thorough assessment exploring relevant literature that demonstrates their reliance on recent scientific and sociological developments in this area.

The Detailed Comments section will explore this matter further.

5. Essential Matters Should Be Addressed Before Issuing the FEIS to Ensure the I-81 Viaduct Project Lives Up to Its Potential

The aforementioned issues (the roundabout placement, the plan for the surplus parcels, and the lack of an adequate lead analysis), are the most pressing identified policy issues in the DEIS that, in the spirit of Environmental Justice, must be remedied before

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[31] LaToria S. Whitehead & Sharunda D. Buchanan, *Childhood Lead Poisoning: A Perpetual Environmental Justice Issue*, 25 J. OF PUB. HEALTH MGMT. AND PRACTICE S115 (2019).

[32] Catalina Jaramillo, *Philadelphia's Building Boom Gives Rise to Another Hidden Lead Risk*, WHYY PBS NPR (July 17, 2017), https://whyy.org/articles/philadelphia-s-building-boom-gives-rise-to-another-hidden-lead-risk/.

[33] CITY OF SYRACUSE, *Lead in Syracuse*, https://data.syrgov.net/pages/lead (last visited Oct. 11, 2021).

[34] Joe Biden 2020 Campaign for President, *The Biden Plan to Secure Environmental Justice and Equitable Economic Opportunity*, DEM. NAT'L COMM. https://joebiden.com/environmental-justice-plan/ (last visited Oct. 11, 2021).

issuing the FEIS. Below are Detailed Comments that discuss specific inadequacies and insufficiencies in the pages of the DEIS, including some beyond those explored above. Several of the following comments intersect with these three major issues presented here. This memorandum provides substantive comments, suggestions, and words of encouragement in the spirit of cooperation and in a sense duty to uphold the principles of Environmental Justice.

As the NYCLU report, for which you were the lead author, indicated this past December, a pathway to "right a historic wrong and to create more equitable outcomes for the entire region" will assist the Lead Agencies in meeting the stated goals for the I-81 Viaduct Project, including "enhancing economic growth and vitality in the City, re-connecting the Syracuse community, and providing better access to jobs, businesses, and services in downtown Syracuse and beyond."[35] We hope these comments provide insight into how adjustment can be made to ensure those goals are achieved.

[35] *Supra* note 1, at footnote 72 ("New York State Department of Transportation, 'I-81 Viaduct: About the Project.' Available at https://www.dot.ny.gov/i81opportunities/about").

Detailed Comments

The Detailed Comments below on the I-81 Viaduct Project Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) (collectively DEIS) are organized by subject matter. As appropriate, they point to specific areas of the DEIS to assist the Lead Agencies in considering and responding to the comments. While interconnected, these are not intended to replicate the concerns articulated in the General Comments above, but to support them with specificity and provide input on some additional areas.

These Detailed Comments are organized by substantive area. The first grouping of comments discusses land use issues in the DEIS, such as possible displacement and resulting gentrification. The second grouping discusses the DEIS's inadequate addressing of human and environmental health impacts. The third group of comments discusses the inadequacies of outreach of the Lead Agencies and inaccessibility of the DEIS itself. The final group entails miscellaneous comments that do not neatly fit into any of the preceding three categories, but are very important to consider nonetheless.[36]

1. The DEIS Fails to Appropriately Consider the Effects of the Preferred Alternative on Environmental Justice Communities by Fully Offering Opportunities to the Voices of Impacted Residents

The Lead Agencies' DEIS for I-81 Viaduct Project fails to acknowledge that the preferred alternative has a significant potential to cause disproportionately high and adverse effects on the minority and low-income populations in the vicinity of construction areas. This is also true of the other alternative.

As the New York Civil Liberties Union (NYCLU) December 2020 Report summarizes:

> The community on the southeast side of the I-81 viaduct has been designated as an "environmental justice community" by the NYSDOT. This technical designation entitles local residents to participate in the decision-making process around the project, and to be protected from shouldering a disproportionate burden of its environmental and social consequences.

[36] We noted a number of spelling errors including in: Chapter 8 Summary of Alternatives on page 8-6: "diplacing 555 employees."; Appendix F on page 131 "from sprint to fall."

> Both state and federal laws provide specific protections for this community.[37]

As an environmental justice community, it is particularly vital that community members whose lives will be directly and significantly impacted by the I-81 Viaduct Project are given adequate opportunities for meaningful engagement by Lead Agencies and do not feel shut out of the planning and decision-making process. These neighborhoods deserve a healthier and more equitable outcome than what unfolded when the I-81 viaduct was originally built. Pursuant to federal guidance, their needs must be more fully addressed throughout the planning and construction phases of the I-81 Viaduct Project than what has been offered in the DEIS.

We therefore suggest that the Lead Agencies commit to a collaborative relationship with the environmental justice community in the Central Study Area during the planning and construction phases of the I-81 Viaduct Project. Only by keeping an open dialogue with the community can the Lead Agencies hear their concerns during the process in a timely fashion, adjust accordingly, all the while ensuring that Environmental Justice is upheld throughout the process. This commitment would suppress fears that the Lead Agencies will stop listening to the community as soon as they are out of the NEPA process.

2. The DEIS Fails to Set Forth Adequate Justification for the Finding That There Will be No Adverse Effects from the Community Grid in Regards to Land Acquisition, Displacement, and Relocation[38]

A. There is an inadequate foundation for the finding in the DEIS that substantial gentrification or displacement is not anticipated

The DEIS states that "the Community Grid Alternative is not anticipated to result in substantial gentrification or displacement within the Project Area" despite predictions of

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[37] NYCLU, *supra* note 1, at 7.

[38] *See* DDR/DEIS Section 6-2-3, 6-99 ("As such, the Community Grid Alternative would not result in adverse effects on environmental justice populations with respect to land acquisition, displacement, and relocation;" *see also* DDR/DEIS Appendix M-5, R3-20, 9, "This DDR/DEIS also includes analysis of the effects of the Project on environmental justice populations and concludes that the Community Grid Alternative would not result in disproportionately high and adverse effects to environmental justice populations."

improved economic activity.[39] The DEIS does not, however, explain how the Lead Agencies arrived at this conclusion.[40] The choices made for the I-81 Viaduct Project will have a lasting effect on the shape of the community, however, and must be more fully assessed before an FEIS is issued.

The DEIS states "the land surrounding the potential redevelopment parcels is primarily publicly owned land, major institutions, and public or rent-subsidized housing."[41] The DEIS goes on to anticipate that new development will be driven by student housing and medical professionals. Researchers know that an increase in new residents with higher economic power leads to gentrification.[42] The economic power of students and medical professionals fits the model likely to spur gentrification.[43] Therefore, it must be more fully analyzed before the FEIS is issued. Additionally, the impact of the anticipated increase in student housing should be more fully assessed to determine whether it could increase disconnect in the community because of the transient nature of students.[44]

Considering these facts, the DEIS does not adequately address why this time will be different. It states that there are "limited redevelopment opportunities."[45] This conclusory qualitative analysis is not enough. The FEIS should include a detailed explanation for why the Lead Agencies do not anticipate gentrification. For example, it appears highly likely that redevelopment in the wake of the Community Grid Alternative could lead to disadvantageous gentrification if land use decisions are not approached thoughtfully.

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[39] DDR/DEIS Section 6-3-2, 6-163.

[40] Forces behind gentrification are complex, and researchers are just beginning to understand the relationship between gentrification and public policy. *See* Kirsteen Paton, *Not the Only Power in Town? Challenging Binaries and Bringing the Working Class Into Gentrification Research*, *in* MIXED COMMUNITIES: GENTRIFICATION BY STEALTH 251 (Gary Bridge, Tim Butler & Loretta Lees eds., 2012).

[41] DDR/DEIS Section 6-3-2, 6-163.

[42] Jackelyn Hwang & Jeffrey Lin, *What Have We Learned About the Causes of Recent Gentrification?* 18 CITYSCAPE 9, 10 (2016).

[43] Darren Smith, *The Politics of Studentification and '(Un)balanced' Urban Populations: Lessons for Gentrification and Sustainable Communities?* 45 URB. STUD. 2541, 2542 (2008).

[44] *Id.*

[45] DDR/DEIS Section 6-3-2, 6-163.

The Lead Agencies' commitment to a working group consisting of representatives from local government, economic development organizations, the business communities, environmental justice communities, neighborhood residents, and other stakeholders is welcome. However, without a stronger commitment and more detailed guidelines, this proposed working group does not ensure that the local community will benefit. A good faith analysis of the likely effects of the Community Grid Alternative as part of the FEIS is essential for Lead Agencies (and the community) to proceed in such a way as to protect all of the community's interests in the future.

B. The DEIS is inadequate in its consideration of residents' potential relocation preferences

Some existing residences are very close to the proposed construction sites. However, the DEIS's description of the Community Grid Alternative states that no residents will be displaced.[46] It does not consider the scenario in which residents do not want to live extremely close to an active construction site. For example, the Pioneer Homes complex is incredibly close–in fact, it is within feet of a current on-ramp to the I-81 viaduct from Almond Street.

Residents located so close to plan construction may, technically, not *need* to be displaced for the actual construction. Nevertheless, FHWA and NYSDOT should develop a plan for residents who would experience extreme inconvenience by such construction and would benefit by moving for the duration of construction because of the proximity of the construction to their homes. As currently envisioned, the plan set forth by the DEIS offers no assistance or promise of assistance if nearby residents understandably do not want to live in the shadow of construction. Construction noises and related impacts, even perfectly managed, can be disruptive to people's work, family, and leisure lives. The residents of Pioneer Homes and any other nearby residences should not be made to suffer through such disruption because construction can technically be completed around them.

[46] DDR/DEIS Sections 6-2-3, 6-98 and Section 6-3-1, 6-139 both note that no residents will be displaced by the Community Grid Alternative.

In Section 6-2-3 of the April 2019 preliminary Draft Design Report/Draft Environmental Impact Statement, the Lead Agencies propose a hotel voucher program for adjacent residents when noise activities might occur at night or over the weekend.[47] The inclusion of the hotel voucher program as an option was initially concerning to begin with because this implied that construction noise would violate the Syracuse noise ordinance.[48] Furthermore, the hotel voucher program did not address the potential noise disruption from 7 a.m. to 9 p.m.[49] This is problematic because many members of the community are employed in nontraditional jobs that require them to sleep during the day.[50] There is no mention of the hotel voucher program in the July 2021 DEIS, which is disquieting, because residents will be disrupted and will not have the opportunity to relocate to hotels during these times. The FEIS should provide an explanation of why the hotel voucher program was removed from the plans leading to the 2021 DEIS.

C. The DEIS is insufficient in its consideration of displacement generally

The DEIS does discuss the relocation and displacement that would occur as a result of the proposed alternative. The Viaduct Alternative would result in the displacement of 24 buildings, including 22 commercial businesses. These businesses include manufacturing and distribution facilities, office buildings, and storage facilities. There are residential units with an estimated 53 dwelling units. Of these displaced buildings all 53 residential units, and 20 of the commercial properties are located within environmental justice communities. Of the employees in the commercial businesses that will be impacted, 422 employees are located within environmental justice communities.[51] Based on these data, the DEIS statement that "... the Viaduct Alternative would not result in adverse effects on environmental justice populations with respect to land acquisition, displacement, and relocation" is unfounded.

The DEIS also states that the Community Grid Alternative would result in the displacement of four commercial buildings, but no private residents. The four

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[47] April 2019 I-81 Viaduct Project DDR/DEIS Section 6-2-3
[48] NEW YORK CIVIL LIBERTIES UNION, *Building a Better Future: The Structural Racism Built into I-81, and How to Tear it Down* (Dec. 2, 2020), https://www.nyclu.org/en/publications/building-better-future.
[49] *Id*. at 22
[50] *Id*.
[51] DDR/DEIS Section 6-2-3, 6-90.

businesses that would be displaced are a furniture shop, an automotive repair facility, a fast-food restaurant, and a Syracuse Housing Authority office and maintenance garage. All of these buildings are in environmental justice communities. Therefore, the DEIS conclusion that for the Community Grid Alternative there will not be adverse effects on environmental justice populations with respect to land acquisition, displacement, and relocation is unfounded.

In both alternatives, the mere relocation and displacement in and of itself is an adverse effect, and since residences and commercial buildings are located within environmental justice areas, then there will be adverse effects. To this end, the FEIS should not only acknowledge that the displacement of residents and commercial businesses will result in adverse effects but go further. The Lead Agencies must note that, even if mitigated, being displaced is emotionally, financially, and physically challenging on a personal level. Furthermore, it uproots community and social structure. This should be more fully acknowledged and planned for in the FEIS.

Moreover, the FEIS should consider the detrimental impact of historic displacement on minority communities and do everything possible to ensure this does not happen with the I-81 Viaduct Project. Government-sponsored displacement is especially problematic. “For Black communities in urban areas, public policies have often been enacted under the guise of creating new public spaces, combating urban blight, or bolstering economic development. But over time, these policies have stripped Black communities of the wealth and financial stability found in property ownership and affordable rental housing.”[52]

The result of displacement could be devastating for some people, particularly in the Viaduct Alternative. Because of this, the Viaduct Alternative is completely unacceptable as it is currently envisioned from an Environmental Justice perspective. “Historic and ongoing displacement has destabilized communities and exacerbated racial disparities

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[52] Danyelle Solomon et al., *Systemic Inequality: Displacement, Exclusion, and Segregation,* CTR. FOR AM. PROGRESS (Aug. 7, 2019, 7:00 AM), https://www.americanprogress.org/issues/race/reports/2019/08/07/472617/systemic-inequality-displacement-exclusion-segregation/.

in economic indicators of well-being. These government policies, combined with the exclusion and segregation [. . .] are causes and consequences of entrenched structural racism in the U.S. housing system."[53] The FEIS must adequately grapple with this reality. The Lead Agencies must be more sensitive to the issue of displacement, and the FEIS should consider this to be more of an Environmental Justice concern. The process leading up to the FEIS must give more attention to the adverse impacts that will result from both alternatives.[54]

3. The DEIS Presents a Wholly Inadequate Exploration and Plan for Lead Paint Containment and the Associated Potential for Lead Poisoning

As part of the description of the effects of construction of the Community Grid Alternative, the DEIS discusses the containment of lead paint particles on the to-be-demolished metal portions of the viaduct. The section explains that the removal method employed would ensure that the majority of the paint would remain, explaining further that any paint knocked free would be captured by the containment measures detailed in Section 6-4-9. The discussion of the Construction Effects merely offers a cursory explanation as to how the lead paint will be contained. Is the plan to employ Class A Containment to ensure that this community—which has suffered and is suffering from the effects of the I-81 viaduct—will suffer no future harms caused by lead leaching from the current I-81 Viaduct Project?[55] No mention is made of what Class Containment will be utilized in Sections 6-2-3, 6-4-9, or Chapter 4-4-2.

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[53] *Id.*

[54] The DEIS also discusses the residential and commercial displacements that would occur as a result of rerouting. While the DEIS does explain that measures will be taken to ensure that the community retains its access to services similar to those offered by the displaced businesses and that those families forced to move will be assisted in finding new housing, concerns persist with the seeming indifference towards these displacements. It must be remembered that part of the animus towards 1-81 is not just its health impacts on the community, but the degradation and destruction of large parts of the community that it was built on top of and through. A desire to rectify these effects of federal activity upon minority and low-income populations was, after all, the catalyst for the inclusion of an Environmental Justice section in the DEIS. *See* Exec. Order No. 12,898, 59 Fed. Reg. 32 (Feb. 16, 1994).

[55] DDR/DEIS Section 6-4-9, 6-509 (describing Class A Containment).

Exposure to lead is a particular disparity borne by many environmental justice communities in the United States.[56] Black children are three times more likely than white children to have elevated blood-lead levels.[57] These elevated blood-lead levels can lead to an array of negative health effects including damage to the brain and nervous system, developmental delays, and behavior problems.[58] This issue is discussed at length above in Section 4 of the Executive Summary.

While it is understood that surveys will need to be taken to identify the exact locations of lead paint, the DEIS offers insufficient discussion as to the level of protection that will be needed to minimize or prevent lead escaping into the surrounding neighborhoods. The residents of the impacted community deserve more clarity and commitment. Moreover, the DEIS does not offer any remedial measures to address any inadvertent lead exposure in the event it does occur.

4. The DEIS Inadequately Analyzes Health Disparities in the Surrounding Environmental Justice Community

It is well known that environmental disparities, such as exposure to toxic chemicals, contaminated water, polluted air, and exposures to other environmental hazards, have a negative impact on health outcomes. For example, air pollution is more severe within short distances to roads, and "this proximity translates directly into health outcomes including increased risk of cardiovascular and respiratory illness and cancer."[59] This is an Environmental Justice concern because air pollution concentration routinely exceeds regional averages in minority and low-income communities.[60]

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[56] Emily A. Benfer, *Contaminated Childhood: The Chronic Lead Poisoning of Low-Income Children and Communities of Color in the United States*, HEALTHAFFAIRS (Aug. 8, 2017), https://www.healthaffairs.org/do/10.1377/hblog20170808.061398/full/.

[57] *Id.*

[58] CTRS. FOR DISEASE CONTROL & PREVENTION, *Prevent Children's Exposure to Lead*, https://www.cdc.gov/nceh/features/leadpoisoning/index.html (last visited Oct. 12, 2021).

[59] Alex Karner et al., *Transportation and Environmental Justice*, *in* THE ROUTLEDGE HANDBOOK OF ENVIRONMENTAL JUSTICE 400-411 (Ryan Holifield, Jayajit Chakraborty & Gordon Walker eds., 2018).

[60] *Id.*

The only discussion of health in the environmental justice section of the DEIS is one sentence regarding the prevention of worker lead exposure during construction. A more comprehensive health analysis as it pertains to Environmental Justice is needed as the FEIS is developed is needed to fully understand possible health impacts for local residents, commuters, pedestrians, and project workers.

Furthermore, there is no mention of asthma in the air quality or environmental justice sections. Comment C 5-4 in Appendix M-5 requested a comprehensive health study.[61] The response to this comment was insufficient and Section 6-2-3 does not include a comprehensive health study through an Environmental Justice scope. This health analysis must include a plan to prevent future disparate environmental exposure, treat current disparate exposure, and remedy past disparate impacts.

The Lead Agencies should pay attention to the children within the environmental justice areas as children are particularly vulnerable to health impacts from environmental exposures. There are sharp disparities across children of different racial and ethnic backgrounds in the prevalence of three common conditions caused in part by environmental exposures: asthma, lead poisoning, and obesity.[62] STEAM at Dr. King Elementary School is located west of the current viaduct and within the I-81 Viaduct Project site. The DEIS suggests that families living in the area are having more children, that more families with children have chosen to stay in the area, and that families with more children have moved into the area.[63] Geographically, the school is centrally located and brings hundreds of children into the proximity of a high-traffic area. These children are going to be more vulnerable to lead poisoning, asthma, and developmental problems.

There is a high interconnectivity between environmentally unjust highway-planning practices and other factors that lead to poor health.[64] One of these factors is inadequate

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[61] DDR/DEIS Appendix M-5, 90-91.

[62] Philip J. Landigran, Virginia A. Rauh & Maida P. Galvez, *Environmental Justice and the Health of Children*, 77 MOUNT SINAI J. OF MED. 178, 178-187 (2010).

[63] DDR/DEIS Section 6-2-2, 6-64.

[64] Landigran et al., *supra* note 62, at 179.

access to medical and preventative care.[65] The Lead Agencies should consider this when doing a comprehensive health analysis and should call for a system that proactively addresses these issues, including disparate incidence rates of asthma, obesity, diabetes, lung cancer, and a range of mental health and developmental problems.[66] Pediatric morbidity is disproportionate among poor and minority communities.[67] A more comprehensive health study for children and the general population should be included in the FEIS to address health disparities.

5. The DEIS's Air Quality Analysis is Inadequate

In Section 6-4-4, the Lead Agencies explain that "[e]xisting conditions are characterized using pollutant levels measured at area monitoring stations. Concentrations of relevant regulated pollutants at stations closest to the Project Area are shown in Table 6-4-4-2." Of the seven pollutants listed in that table, three of the monitoring stations are located in Syracuse. Three others are located in Rochester and the nitrogen dioxide monitoring station is in Buffalo. The use of Buffalo and Rochester air quality as representative of Syracuse's air quality is inadequate.

Air quality is not the same in any single given city from neighborhood to neighborhood, let alone from city to city. Syracuse, Rochester, and Buffalo are similarly situated Northeastern cities, but taking for granted that their air quality is similar enough to stand in for one another is inadequate. At the very least, Syracuse-specific air quality analyses for carbon monoxide, particulate matter (10 micrometers or less), nitrogen dioxide, and ozone must be completed and evaluated when compiling the FEIS. Additionally, the representative monitoring stations in Syracuse are located in East Syracuse, which may not be representative of all the study areas in Syracuse.[68]

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[65] *Id.*

[66] *Id.*

[67] *Id.* at page 186.

[68] Nadja Popovich et al., *See How the World's Most Polluted Air Compares With Your City's*, N.Y. TIMES (Dec. 2, 2019), https://www.nytimes.com/interactive/2019/12/02/climate/air-pollution-compare-ar-ul.html.

6. The DEIS Inadequately Considers COVID-19 Going Forward

The DEIS was prepared prior to the COVID-19 global pandemic. The effects of the pandemic continue to develop and ripple through all aspects of our lives. The FEIS should reflect an analysis of the impact COVID-19 on the Project area and how the effects of the ongoing pandemic will change the outcome of their analyses about the permanent effects of the Community Grid Alternative.

For example, the DEIS estimated the expected indirect business displacement based off of traffic projections using data from the Annual average daily traffic, the Institute of Traffic Engineers Trip Generation Handbook, 2d Edition, the Syracuse Metropolitan Transportation Council Regional Travel Demand Model, and StreetLight data.[69] If there is a permanent change in the landscape of work, that will significantly alter the traffic patterns around Syracuse. Many cities have experienced a drop in need for transit ridership[70] and office work.[71] While it is not clear what the permanent, cumulative effects of the pandemic will be, there is no analysis in the DEIS of how the pandemic will affect the future needs of the community. While the analyses of the effects of projected traffic patterns on the local businesses were likely as accurate as possible pre-pandemic, now there is doubt.

Additionally, the United Nations predicts that the frequency of pathogenic microorganisms jumping to human populations is increasing because of how food is sourced and grown, and how humans have altered the environment.[72] Currently, the DEIS does not contain an analysis of the possible effects the spread of disease will have on the Community Grid Alternative. There are steps the government can take to

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[69] DDR/DEIS Appendix D-2, 2.

[70] EBP US, INC., *The Impact of the COVID-19 Pandemic on Public Transit Funding Needs in the U.S.*, (Jan. 27, 2021), https://www.apta.com/wp-content/uploads/APTA-COVID-19-Funding-Impact-2021-01-27.pdf.

[71] Dana Anderson, *A Record 27% of Homebuyers Are Looking to Relocate, as Pandemic Accelerates Trend Toward Affordable, Less Dense Areas*, REDFIN (Jan. 20, 2021), https://www.redfin.com/news/april-may-2020-housing-migration-report/.

[72] Delia Grace Randolph et al., *Preventing the Next Pandemic: Zoonotic Diseases and How to Break the Chain of Transmission*, UNITED NATIONS ENVIRONMENT PROGRAMME (2020), https://wedocs.unep.org/bitstream/handle/20.500.11822/32316/ZP.pdf?sequence=1&isAllowe d=y.

lower the risk of another pandemic event.[73] The FEIS must include an analysis into the post-pandemic needs of the community in order to assess if any portions of the Community Grid Alternative can be adjusted to better suit the needs of the community.

7. The DEIS Insufficiently Assesses Noise Abatement

The DEIS discusses a Noise Study conducted using 19 receivers along the route, analyzing the traffic noise and abatement from 15 proposed noise blockers. Merely two of the 19 receivers studied registered a perceptible benefit from the proposed noise barriers. Thus, at 17 of those receivers the perceptible noise increases from the altered traffic patterns would not be abated.

There are certainly costs associated with the proposed noise barriers, but there should be increased consideration for such barriers to further abate the perceptible noise increases. The DEIS proposes measures that leave 89% of the proposed route experiencing unabated noise increases exempt from placement of noise barriers, which seems unnecessarily high. While the cost of implementation must be weighed, so too must the corresponding decrease in home value should these blockers not be placed.

8. The DEIS Insufficiently Considers the Impact of Increased Chloride Concentrations on Immediate Surroundings

The DEIS states that the Community Grid Alternative would result in increased chloride concentrations in Onondaga Lake to potentially 643.3 mg/L. Locally, they anticipate a 9.4 percent increase in the Central Study Area, a 4.2 percent increase in the I-481 South Study Area, a 40% increase in the I-481 East Study Area, and a 27.2% increase in the I-481 North Study Area. These represent significant jumps that will have negative effects on the local aquatic species.

Current chloride levels in the study areas are already unacceptably high for the local wildlife. The rates hover in the chronic exposure category which can lead to a decline in

[73] Neluka Leanage & Pierre Filion, *Pandemic and Future-Proofing Cities: Pedestrian-oriented Development as an Alternative Model to Transit-based Intensification Centers*, 3 PUB. SPACE & MOBILITY 187 (2021) (cities can focus on creating more permanent pedestrian oriented modes of like walking, cycling, scootering, and using mopeds).

the diversity of aquatic species resulting in a trophic cascade.[74] Species loss is an injustice towards future generations.[75] Phytoplankton, zooplankton, macro invertebrates, and fish communities are all at risk from elevated chloride levels.[76]

There is no mention in the DEIS of alternative methods to the stormwater best management practices (BMPs) that would achieve lower chloride concentrations in the immediate vicinities. This is inadequate.

The DEIS attempts to obscure the effects that will be felt in these immediate vicinities by highlighting how little the increase in chloride concentration will affect Lake Onondaga. That analysis is irrelevant and ignores the effects on the biota that live in the immediate vicinity of the I-81 Viaduct Project areas.

The Lead Agencies should include a specific account of what species will be affected by the increased chloride concentrations in the immediate study areas in the FEIS. Only with that information can we ascertain exactly what will be destroyed by the increased chloride concentrations and whether the environmental impact from that loss is acceptable or not. Anything less is insufficient.

9. The DEIS as Offered for Comment Lacks Key Accessibility Features

The DEIS is not presented in a user-friendly format which creates a barrier to accessing the information. Although more convenient for phone and low-bandwidth access, only presenting the sections in individual files, rather than also offering a single complete document in one cohesive file made it very difficult to search for information in different but connected sections on larger and higher-bandwidth devices. Rather than being able to perform a simple Control+F to search for key terms, each file must be opened and searched separately, which is unnecessarily inefficient and time consuming. This lack of

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[74] Hilary A. Dugan et al., *Salting Our Freshwater Lakes*, 114 PROC. NAT'L ACAD. SCI. U.S.A. 4453, 4457 (2017).

[75] Adrian Martin et al., *Global Environmental Justice and Biodiversity Conservation*, 179 GEOGRAPHIC J. 122, 128 (2013).

[76] Dugan et al., *supra* note 61, at 4457.

accessibility prevents the Lead Agencies from garnering the most extensive, substantive commentary.

The I-81 Viaduct Project website is not presented in a user-friendly format effectively creating a barrier to access of information. The content is segmented in a manner that makes the website very time consuming to use and information is easy to overlook. The Virtual Public Outreach Center is unnecessarily complicated and confusing to navigate, especially for someone who is not computer-savvy.

Likewise, the DEIS Appendices are insufficiently navigable. For example, Appendix M-5 Responses to Comments Received is poorly organized and does not contain a table of contents despite the document being 196 pages in length. To find any section breaks, one must download the document and open the bookmarks tab in Adobe. Similarly, Appendix C4 is 817 pages and does not have a table of contents to help residents and other stakeholders navigate it. Appendix F is divided into two sections, the second of which has more than 100 unnumbered pages of grainy documents. The FEIS must be organized in a more accessible manner.

10. The Lead Agencies Lacked Sufficient Outreach

FHWA and NYSDOT failed to provide the community with opportunities for "meaningful involvement" in several ways during the DEIS process.

A. There was insufficient public involvement due to significant gaps of time between public meetings

As the I-81 Viaduct Project has progressed, there have been significant gaps in the Lead Agencies' public outreach and their provision of opportunities for in-person public involvement. It appears that only two Project Update Presentations were given, one in 2014 and one in 2015, but none have been held since 2015.[77] Table S-3 Public Involvement Meetings and Key Milestones in the Executive Summary indicates no neighborhood or community meetings were held for approximately two and a half years between December 6, 2016 and June 25, 2019, while the DEIS was being developed. [78] No neighborhood or community meetings were held between September 11, 2019 and

[77] DDR/DEIS Chapter 9, 9-15.

[78] DDR/DEIS Chapter 9, 9-13.

the Virtual DDR/DEIS and EDPL Public Hearing on August 17, 2021.[79] Despite the magnitude of the current I-81 Viaduct Project, after publication of the July 2021 DEIS, official Public Hearings were only conducted on just two days: August 17, 2021 and August 18, 2021.[80] As discussed below, neighborhood meetings also offered limited access.

B. There was insufficient opportunity for meaningful community involvement due to timing of meetings and lack of appropriate COVID accommodations

The Neighborhood Meetings held in August and September 2021 were in-person meetings, and the flyer did not indicate an option for remote participation. Given the high transmissibility of the COVID-19 Delta variant and a general increase in infection rates during this time, an option to participate virtually would have given community members, especially those who are immunocompromised, a safe alternative.

Meetings were all held from 6:00-8:00 PM on weeknights which likely excluded some community members from being able to participate. Many members of the community work in service jobs and have non-traditional hours, including nights and weekends. (See flyer at right.)

The Lead Agencies should have provided some in-person opportunities for comment on mornings, afternoons, and weekends. This would have allowed more members of the community to contribute their perspectives on the I-81 Viaduct Project.

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[79] N.Y. ST. DEP'T OF TRANSP., *Comment on Draft Environmental Impact Statement*, https://webapps.dot.ny.gov/i-81-viaduct-project-public-outreach.

[80] *Id.*

C. There was inadequate DEIS access for Limited English Proficiency participants

The I-81 Viaduct Project website is in English with no direct option to translate the content into Spanish or any other languages commonly spoken in neighborhoods in proximity to the construction area. This left community members at the mercy of digital translation services which can be inaccurate and misleading. Translators should be used in preparing the FEIS to avoid repetition of this oversight.

Per U.S. Census Bureau data provided in the DEIS, six percent of people residing in the project area are considered to have Limited English Proficiency (LEP), which equates to over 11,000 residents.[81] NYSDOT's LEP Plan,[82] which follows the authority of Executive Order (E.O.) 13,166,[83] indicates that language services should be provided if the number of LEP persons for an eligible language group constitutes 1,000 people or at least five percent of people in the project area, whichever is less.[84]

Chapter 9 of the DEIS states that "[T]he Project website, www.dot.ny.gov/i81opportunities, includes 'Language Assistance' links in Spanish, Chinese, Haitian Creole, Italian, Korean, and Russian; these links provide LEP individuals with additional information regarding their rights under Title VI of the Civil Rights Act of 1964."[85] The DEIS is referencing what we believe to be a now-defunct version of the project website, which redirects to the current site.[86]

It appears that the "Language Assistance" functionality is not available on the current site. To be compliant with Executive Order 13,166 and NYSDOT's LEP Plan requirements, the project website should be updated to include this feature. In addition to amending the website, in order to give LEP residents the opportunity for meaningful

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[81] DDR/DEIS Appendix M-3, 8.

[82] NEW YORK STATE DEPARTMENT OF TRANSPORTATION OFFICE OF CIVIL RIGHTS, Limited English Proficiency (LEP) Plan, 18 https://www.dot.ny.gov/divisions/policy-and-strategy/public-trans-respository/Attachment%2520D-1%2520LEP_Plan.pdf (last visited Oct. 14, 2021).

[83] Exec. Order 13,166, Improving Access to Services for Persons With Limited English Proficiency, 65 Fed. Reg. 50121, (Aug. 2000) 00-20938.pdf (govinfo.gov).

[84] DDR/DEIS Appendix M-3, 8.

[85] DDR/DEIS Chapter 9, 11

[86] *See* https://webapps.dot.ny.gov/i-81-viaduct-project?utm_medium=301&utm_source=i81.dot.ny.gov.

participation in the I-81 Viaduct Project, the FEIS should be translated into the languages listed above, which are the ones most frequently spoken by residents in the project area.

D. The DEIS comment event on September 9, 2021 was insufficiently staffed

Attempted community engagement with the comment process was frustrated at the Neighborhood Meeting held on September 9, 2021 at STEAM at Dr. King Elementary School. Long queues developed when there were a significant number of attendees who wished to relay their comments on the DEIS and there was only one transcriber present. In addition, there was one unmarked phone at the meeting where people could call in their comments which went largely unused.[87]

11. In the Process Leading to the FEIS, the Lead Agencies Should Commit to Continued Public Participation During the Implementation and Construction Phases of the I-81 Viaduct Project

The I-81 Viaduct Project is massive and the construction will take many years. In the interest of Environmental Justice, it is critical that the Lead Agencies remain in frequent contact with the residents who live in close proximity to the viaduct. The environmental justice communities impacted by the I-81 Viaduct Project are entitled to meaningful participation throughout the implementation phase. In Chapter 9 of the DEIS it states, "FHWA and NYSDOT are committed to developing and using public engagement to encourage environmental justice populations to participate meaningfully from the earliest stages of the Project through its implementation."[88] Later in the chapter the DEIS reiterates, "[o]pportunities for public input have and will continue to occur throughout the Project."[89] It is crucial that the FEIS furthers this commitment to the community.

It is imperative that the Lead Agencies develop strong, lasting partnerships with community leaders and community-based organizations in environmental justice

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[87] Interview with Lanessa Owens-Chaplin, Esq., Project Counsel, New York Civil Liberties Union (Sept. 23, 2021).

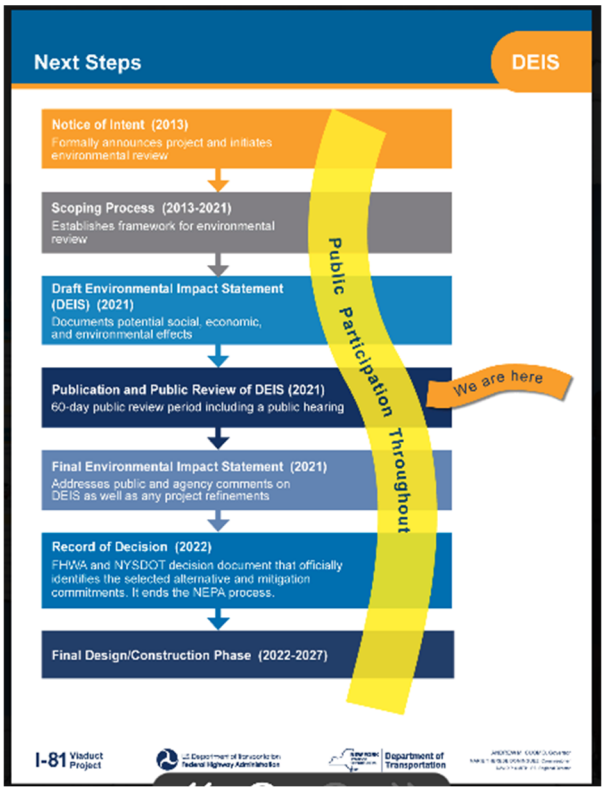
[88] DDR/DEIS Chapter 9, 9-8.

[89] DDR/DEIS Chapter 9, 9-12.

neighborhoods. To build trust and maintain open lines of communication between the Lead Agencies and the residents most affected by the I-81 Viaduct Project, the Lead Agencies should consider creating a community-led Environmental Justice Working Group that will act as liaison for residents near the work zones and will operate throughout the construction phase and beyond. This working group can help ensure that the public remains involved and the needs and concerns of the residents continue to be met and their questions are answered as construction progresses.

A. Environmental Justice requires that the Lead Agencies provide detailed information regarding their commitments to continued public engagement with environmental justice communities during the implementation/construction phase, an estimated five-year commitment if the Community Grid Alternative is implemented

NEPA encourages collaboration through the decision-making and implementation phase of a project, including monitoring and evaluation. The "Next Steps" graphic to the right indicates that FHWA and NYSDOT intend that there will be public participation throughout every phase of the I-81 Viaduct Project, including the Final Design/Construction Phase from 2022 through 2027. This graphic, however, does not provide any detailed information about what opportunities there will be for public participation. Similarly, in the video of the Interstate I-81 Viaduct Project Public Hearing August 17 and 18, 2021, the narrator says only one sentence regarding ongoing community involvement: "There will be community engagement throughout construction."[90]



In Chapter 6, there is only one sentence mentioning ongoing opportunities for public involvement: "Additional meetings will be scheduled, as appropriate, as the Project

[90] *See supra* note 79.

progresses."[91] Reference to the project website could have been included along with a commitment to keep interested parties informed.

It is not until one navigates to Table 4-7 in the DEIS that any detail is provided about the Lead Agencies' plans for community engagement during the construction phase of the Project. This information is not located in Chapter 9: Agency Coordination and Public Outreach, as one would expect it to be.

In Table 4-7 (reproduced in relevant part below), the Lead Agencies outline several commitments to the public during the implementation/construction phase of the Project. The FEIS should recommit and provide more detailed information regarding each of these commitments.

Table 4-7 (cont'd)
Measures to Minimize Community Impacts

Technical Area	Commitments
Public Engagement	Provide early and continual public involvement opportunities throughout the transportation planning process, including providing information on the Project's website, making public announcements, and providing numerous opportunities for input.
	Provide timely information about transportation issues and processes to the general public, affected public agencies, freight shippers, private providers of transportation, and others affected by transportation plans, programs, and projects.
	Use Variable Message Signs to provide real-time motorist information concerning construction dates, traffic changes, delays, and other pertinent work zone traffic related information.
	Develop a construction communication program to guide community engagement throughout construction.
	Establish a project outreach center to disseminate construction information and to obtain input from the public.
	Conduct community open houses periodically throughout the construction period to proactively disseminate construction information and to receive comments regarding construction from the community.
	Establish a phone and email hotline to accept comments regarding construction operations.
	Develop an app and/or social media platform to communicate construction status, detours, closures, and other relevant construction information.
	Coordinate with local media to communicate construction information.
	Establish a protocol to accept and address community complaints.

A Project Outreach Center had once been operational, but ceased operations in November 2019. While the center was operational, it was only open for six hours per week, on Tuesdays and Thursdays between 11:00 AM to 2:00 PM.[92] The Project Outreach Center should be operational on a more inclusive basis during the construction phase with hours that best accommodate the needs of the community. The Lead Agencies should commit to the Project Outreach Center remaining operational during the entirety of the construction phase and having hours during some weeknights and on weekends on a monthly basis. The Project Outreach Center might be best

[91] DDR/DEIS Section 6-2-3, 6-112.

[92] DDR/DEIS Chapter 9, 9-23.

placed nearby the footprint of construction so that local affected residents may conveniently visit and voice their concerns.

The Lead Agencies must consider the needs of environmental justice communities as public engagement plans are developed. These considerations include locating the public outreach center in an environmental justice neighborhood, locating it near public transportation, having hours of operation that serve the needs of the community, and making necessary accommodations for Limited English Proficiency residents.

In addition to the commitments outlined in Table 4-7, the Lead Agencies have committed in the DEIS to "continuing to develop its program for local hiring and commitments for contracting minority-owned businesses."[93] Specific details of this program should be reflected in the FEIS, including how information will be shared with the public.

Similarly, the Lead Agencies state in the DEIS that they "would continue to coordinate with the Syracuse Housing Authority regarding property acquisition and its master plan."[94] Specific details of the property acquisition program should be reflected in the FEIS, including how information will be shared with the affected community.

B. The FEIS must include a detailed plan for involving environmental justice communities in the development and implementation of adverse effect mitigation measures and monitoring during and after construction

The Federal Interagency Working Group on Environmental Justice & NEPA Committee states:

> Throughout the NEPA process, agencies may wish to (as appropriate) involve potentially affected minority populations and low-income populations as agencies develop and implement mitigation measures and monitoring. Establishing groups made up of community members can be an effective method of engaging minority and low-income populations as an agency develops mitigation measures. . . . Including monitoring requirements and sharing monitoring results with the public can often help to alleviate issues raised by minority populations and low-income populations. Discussions with minority populations and low-income populations regarding the types of monitoring information that are of interest and how to best share monitoring results may improve the effectiveness of

[93] DDR/DEIS Section 6-2-3, 6-115.

[94] *Id.*

> monitoring efforts. Feedback from minority populations and low-income populations can also be considered when developing monitoring measures.[95]

The Working Group suggests that agencies, "make their mitigation and monitoring commitments clear and accessible in a format easily understandable by the public, including minority populations and low-income populations."[96]

In the DEIS, the Lead Agencies commit to creating a:

> comprehensive construction plan in collaboration with the Syracuse City School District, which would include installing adequate mechanical air ventilation and filtration systems for schools in the footprint of construction, installing soundproof and/or storm windows and adequate wall insulation, creating safe zones for walking and bicycling, and numerous other elements.[97]

The specific details of the comprehensive construction plan should also be outlined in the FEIS—including specific ways to mitigate and monitor noise and air pollution both during and after construction—along with a plan for continued collaboration with parents, faculty, and staff at the Syracuse City School District throughout construction. The comprehensive construction plan in the FEIS must include commitments to:

- Create safe walking and cycling zones.
- Implement regulations on construction vehicles idling and parking near the school.
- Ensure parking access for school busses, parents' vehicles, and public transportation.
- Limit work during school hours.
- Remove hazards in a timely manner.
- Designate play zones during construction.[98]

12. The DEIS Inadequately Considers Syracuse's Unhoused Population

The DEIS does not contemplate the effects of the Project on Syracuse's unhoused population. According to Patrick McCarthy of *The Daily Orange*, there are approximately

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[95] FED. INTERAGENCY WORKING GROUP ON ENV'T JUST. & NEPA COMMITTEE, PROMISING PRACTICES FOR EJ METHODOLOGIES IN NEPA REVIEWS (2016), https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf.

[96] *Id.* at 48.

[97] DDR/DEIS Section 6-2-3, 6-112.

[98] NYCLU, *supra* note 1, at 34.

600 unhoused people living in Syracuse.[99] Searching Sections 6-2-1 Neighborhood Character, 6-2-2 Social Groups Benefited or Harmed, 6-2-3 Environmental Justice, and 6-3-1 Land Acquisition, Displacement, and Relocation for the terms "unhoused" and "homeless" yields no results. This demonstrates that the DEIS does not contemplate the effects of the Project on this population at all, let alone adequately. The Project may or may not have some effects on the unhoused people in Syracuse, but no analysis of such is provided. The Project's environmental justice analysis is incomplete and inadequate without consideration of this population. The Lead Agencies must consider this environmental justice population.[100]

13. The DEIS Lacks Specificity Regarding a Plan for Urban Forest Management

The DEIS lists 14 landscape units, all of which contain trees of some type.[101] Yet only three of the landscape units (Units 4, 6, and 13) mention the existence of trees. Even when trees are mentioned, there is no analysis of what species of trees exist; what benefits these trees provide to the Central Study Area community; what types of trees will be planted as a result of either alternative; or, how the adverse effects of removing trees are best mitigated by keeping old trees whenever possible, not by replacing full-grown tress with saplings.

The DEIS does mention several times that there are deciduous trees in the area. However, the DEIS is silent on exactly what species of trees, deciduous or otherwise, are present. The FEIS should list in detail the extent to which the current trees, deciduous or not, are mostly male or female; the precise species of trees present, along with the age and size of said trees; what efforts can be made to preserve existing full-grown trees; and, the benefits and pitfalls of planting different species/types of trees to replace and add to the existing urban forest, e.g., deciduous, fruit or nut bearing, evergreen, and so on. A modern and cost-effective way to gather data on different tree is through the use of Airborne Visible Imaging Spectrometer (AVIRIS) data.[102]

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[99] Patrick McCarthy, *Syracuse Now a Leader in Fight Against Homelessness*, THE DAILY ORANGE (Feb. 22, 2020), http://dailyorange.com/2020/02/syracuse-now-leader-fight-homelessness/.

[100] Erin Goodling, *Intersecting Hazards, Intersectional Identities: A Baseline Critical Environmental Justice Analysis of US Homelessness*, 3 ENV'T & PLAN.: NATURE & SPACE 833, 833 (2019).

[101] DDR/DEIS Appendix F; *see also* DDR/DEIS Section 6-4-3.

[102] Q. Xiao, S. L. Ustin & E. G. McPherson, *Using AVIRIS Data and Multiple-Masking Techniques to Map Urban Forest Tree Species*, 25 INT'L J. OF REMOTE SENSING 5637, 5637 (2004).

In the past, it was common practice for urban planners to favor male trees, since they do not produce seeds. This practice led to entire urban landscapes plagued by excessive pollen. Excessive pollen in the air can lead to adverse health effects like hay fever and asthma, ultimately leading to a decrease in the quality of life for countless Americans.[103] Thus, while maintaining a proper urban forest is beneficial for a number of other reasons, an urban forest can also have negative health impacts if improperly managed. Excessive, or sole, use of male trees is but one example of improper urban forest management. If there are an excessive number of male trees that will be affected by the Project, then it would be beneficial in the long run to replace some of the male trees with females. If, however, there is already a sufficient mix of male and female trees, or trees that are both male and female, then cutting the present trees down would be detrimental to the health and welfare of the Central Study Area residents, since fully grown trees offer more of an environmental service than saplings.[104]

As a matter of environmental equity, improper urban forest management can be viewed as a form of undesirable local land use. While some level of undesirable land use is inevitable in any urban environment, the distribution of this undesirable land use must be shared equally between communities. Preventing the mismanagement of urban jungles is a readily available way to prevent further environmental inequity.

Indeed, in the context of urban forest management and growth, it seems entirely feasible to fully prevent this form of undesirable land use. Righting past wrongs, however, is much more difficult than preventing future ones. In the Central Study Area—a community that is both marginalized and is slowly being taken over by external developers—there is a critical need to restore a sense of self-determination in the community. The best way to do this goes beyond seeking input as to what types of trees

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[103] Ally Hirschlag, *How Urban Planners' Preference for Male Trees has Made Your Hay Fever Worse,* THE GUARDIAN (May 16, 2020), https://www.theguardian.com/environment/2020/may/16/how-urban-planners-preference-for-male-trees-has-made-your-hay-fever-worse.

[104] The various benefits of full grown, or even ancient, trees are well documented; *see generally* Alison A. Ormsby, *Diverse Values and Benefits of Urban Sacred Natural Sites*, 6 TREES, FORESTS AND PEOPLE Article 100136, 1 (2021); Ramly Hasan et al., *Tree Preservation Order and Its Role in Enhancing the Quality of Life*, 222 PROCEDIA – SOC. & BEHAV. SCI. 493 (2016); Livia Zapponi et al., *The Role of Monumental Trees for the Preservation of Saproxylic Biodiversity: Re-thinking Their Management in Cultural Landscapes*, 19 NATURE CONSERVATION 231 (2017).

residents would like to see in their environment—although this is a great start—and to take advantage of the fact that both alternatives would result in several tracts of vacant land. Ideally, this land should be returned either to (a) the original owner or their heirs, if the land was originally taken via eminent domain at any point in the last 100 years, or (b) placed in a public trust controlled by members of the community, so they can determine what to do with it, e.g., build parks, community centers, or whatever they want.[105] At best, the DEIS ignores how the residents of the Central Study Area, as well as other communities, are at severe risk of losing their collective identity in a wave of 'new development' that the DEIS posits.[106]

To this end, the FEIS should also take a closer look at the nature of each specific property within each study area. Trees are but one element of the complex and interconnected environment that people inhabit.[107] Certain historical properties, like the Oakwood Cemetery, are adversely affected by the highway's original construction. The Oakwood Cemetery in particular had its main entrance removed in order to make way for the highway. Now, under the Community Grid Alternative, the opportunity presents itself to not only right a past wrong, but to create a "gateway" into this community. The DEIS praises the addition of "gateways" as a positive effect of both alternatives.[108]

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[105] Shawn M. Landry & Jayajit Chakraborty, *Street Trees and Equity: Evaluating the Spatial Distribution of an Urban Amenity*, 41 ENV'T & PLAN. A: ECON. & SPACE 2651, 2651 (2008).

[106] In DDR/DEIS Section 6-4-3, 3.3, the DEIS attempt to analyze the indirect effects of removing buildings to 'facilitate new development,' claiming that it analyzed the effects this will have on low income and/or minority groups by citing to DEIS Section 6-2-2; which only states the presumption that any new development will be similar, before citing to Section 6-2-2.4; which is specifically not an analysis of the potential effects this Project will have on low income/minority communities; this section does, however, note that the cumulative effect of increased connectivity between neighborhoods could invite new types of residents, yet again presumes no change in demographics. There is no mitigation analysis for a potential demographic change.

[107] *See* Jeremy C. Wells & Elizabeth D. Baldwin, *Historic Preservation, Significance, and Age Value: A Comparative Phenomenology of Historic Charleston and the Nearby New-Urbanist Community of I'On*, 32 J. ENV'T PSYCH. 384 (2012).

[108] In what may be an error, DDR/DEIS Section 6-4-3 mentions 'gateways' as a potential way to mitigate the negative effects of both alternatives. However, both alternatives cite to inconsistent portions of Appendix F. The Viaduct Alternative, DDR/DEIS Section 6-4-3, 6-228 cites to Section 4.4.2 of Appendix F, titled 'Community Grid Alternative'; similarly, DDR/DEIS Section 6-4-3, 6-232, there is a gateway citation to Appendix F Section 4.4.3, which does not exist.

14. The DEIS in Incongruous in its Crash Reduction Assessment

The DEIS indicates a four percent reduction in Crash Conflicts for the Viaduct Alternative and a 20% reduction in Crash Conflicts for the Community Grid Alternative, yet the total monetary difference in Crash Cost Benefit is listed as $34,765.

From Table 8-1 to Chapter 5 to Appendix C-4, the number of crashes and the locational benefit or costs are separated through charts and tables. Outlining which locations are projected to have more severe accidents, which increase the cost per accident to correlate with a 16% reduction in Crash Conflicts to only a one percent reduction of Crash Cost Benefit, would allow further study to derive alternative measures at those locations to increase the benefit of having fewer conflicts and promote a comprehensive and complete safety analysis within the scope of this project.

15. The DEIS Does Not Address the Practicality of its Proposed Three-Minute Time Limit on Idling Engines During Construction

The DEIS commits to limiting idling time for diesel engines to three minutes as a way to mitigate effects on air quality.[109] Of course, this three-minute maximum for engine idling would help ensure that air quality is not adversely affected in a severe manner. From a practicality standpoint, however, there is a concern over how this standard will actually be monitored or regulated. A well-intentioned regulation without any enforcement mechanism may simply be ignored, leading to the adverse air quality effects it sought to avoid.

Conclusion

The analyses above offer input on the most important Environmental Justice issues presented by the DEIS. We appreciate the years of work that went into producing this important document, but more remains to be done.

As our Executive Summary sets forth, we urge the Lead Agencies to do significant work in three major areas: the roundabout placement, the plan for the surplus parcels, and

[109] DDR/DEIS Chapter 4, 4-42.

the lack of an adequate lead analysis. The Detailed Comments provide additional important insights, but they are ultimately just a glimpse into all the Environmental Justice realm has to offer. In closing, we invite the Lead Agencies to look at the resources we offer below with some recent insights into the current thinking on achieving Environmental Justice.

Recommended Resources

Below is a list of recent resources that you might not have been able to consider while drafting the DEIS. We strongly suggest experts review to ensure the Lead Agencies are familiar with strong examples of current discourse regarding Environmental Justice. Most resources are conveniently hot-linked. For the two which are not readily available, we have attached PDFs for easy access.

1. Craig Anthony (Tony) Arnold & Resilience Justice Project Researchers, *Resilience Justice and Community-Based Green and Blue Infrastructure*, 45 WM. & MARY ENV'T. L. & POL'Y REV. 665 (2021).
2. Deborah N. Archer, *"White Men's Roads Through Black Men's Homes": Advancing Racial Equity Through Highway Reconstruction*, 73 VAND. L. REV. 1259 (2020).
3. Madeline Marguerite Byers, *Houston, We Have a Gentrification Problem: The Gentrification Effects of Local Environmental Improvement Plans in the City of Houston*, 7 TEX. A&M J. PROP. L. 163 (2021).
4. Scott D. Campbell & Moira Zellner, Wicked Problems, Foolish Decisions: Promoting Sustainability Through Urban Governance in a Complex World, 73 VAND. L. REV. 1643 (2020).
5. Jesse Hevia, *NEPA and Gentrification: Using Federal Environmental Review to Combat Urban Displacement*, 70 EMORY L.J. 711 (2021).
6. Barry E. Hill, *Environmental Justice: Legal Theory and Practice*, 45 ENVTL. L. REV. 10236 (2015).

7. Audrey McFarlane, *Black Transit: When Public Transportation Decision-Making Leads to Negative Economic Development*, 106 IOWA L. REV. 2369 (2021).
8. Richard L. Revesz, *Air Pollution and Environmental Justice*, 49 ECOLOGY L. Q. (forthcoming 2022).
9. Noah Sachs, *Toxic Floodwaters: Strengthening the Chemical Safety Regime for the Climate Change Era*, 46 COLUM. J. ENV'T. L. J. 73 (2020).
10. Brie Sherwin, *After the Storm: the Importance of Acknowledging Environmental Justice in Sustainable Development and Disaster Preparedness*, 29 DUKE ENV'T. L. & POL'Y F. 273 (2019).
11. Omari Scott Simmons, *Urban Removal: Reshaping Urban Landscapes Through a Responsive Communitarian Lens*, 29 CORNELL J. L. & PUB. POL'Y 885 (2020).
12. Sarah Waldeck & Rachel D. Godsil, *Home Equity: Rethinking Race and Federal Housing Policy*, 98 DENV. L. REV. 523 (2021).
13. Candice Youngblood, *Put Your Money Where Their Mouth Is: Actualizing Environmental Justice by Amplifying Community Voices*, 46 ECOLOGY L. Q. 455 (2019).

Northside Business Partnership Comments for DEIS

Dallas Bryson <dallas@nehda.org>

Thu 10/14/2021 4:10 PM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>

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Hello,

Please find attached the comments for the Northside Business Partnership regarding the upcoming I-81 project. The Northside Business Partnership represents over 50 Northside businesses. These comments reflect comments from our members, with the final version voted on by our board and signed by our president, Regina Santucci of James Street Parlour.

Please let us know if you have any questions.

Dallas Bryson
(Pronouns: she, her, hers)
Small Business Facilitator
NEHDA, Inc.
101 Gertrude Street, Syracuse, NY 13203
Office: 315-425-1032
Cell: 315-464-0014

"A small business is an amazing way to serve and leave an impact on the world you live in." - Nicole Snow

NEHDA facilitates community development that promotes strong and safe neighborhoods, thriving businesses, and active civic engagement.
Learn more at nehda.org

October 14, 2021

Mr. Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Mr. Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Re: Northside Business Partnership 2021 Draft Environmental Impact Statement (DEIS) Comments

Dear Mr. Frechette and Mr. Marquis,

The Northside Business Partnership, consisting of a membership of 53 businesses throughout the neighborhood, offers its support of the Community Grid. As our members are businesses of all sizes and types, we recognize the importance of a balanced, well-designed, and accessible transportation system to meet the needs of our community and those who patronize our establishments. Although work remains to be done to refine the Community Grid to be the best it can be for Syracuse and Central New York, as well as a model for other communities across the county, we feel the Community Grid alternative is the right one. It not only provides for the transportation needs of our community but it also preserves several historic buildings in our neighborhood, buildings that house several businesses, organizations, and residents while also being integral to the North Salina Street National Historic District.

We appreciate that NYSDOT has been listening to community concerns and the work done to incorporate this feedback into the project. We encourage it to continue to do so as the NEPA process moves toward the Record of Decision. We believe this will lead to a better outcome for the project in terms of the overall transportation system and the impact it has on the surrounding neighborhoods. In light of this, we offer the following comments on the Draft Environmental Impact Statement released in July 2021.

- Construction impacts
    - A majority of Northside establishments are small, independently owned businesses that have struggled through the pandemic. Without proper planning and coordination to support small businesses, a multi-year road reconstruction project will only further hurt them no matter how great the end product. We recognize that implementing the Community Grid as quickly as possible is beneficial in the long-term, and that there will be some short-term negative impacts. We would like to see those impacts lessened whenever possible including:

        - A clearer understanding of how NYSDOT and its contractors plan to give ample warning to businesses for activities impacting them and their customers.
        - The ability to help shape the project's construction schedule to reduce negative impacts on small businesses via open, two-way communication channels with NYSDOT and their contractors.
        - Opportunity to have "open during construction" signs for businesses installed at critical locations throughout the Northside

    - It is important to provide accommodations for pedestrians, transit users, and bicyclists, in addition to vehicles, during construction, a challenge highlighted during the work in some areas of the North Salina and North State street corridors during the summer of 2021. This is especially important for people with limited mobility (i.e. those relying on wheel chairs or motorized scooters). We request more clarity on how these accommodations will be provided and, in instances where there are problems during construction, who will be accountable for addressing them.

    - Parking is a crucial consideration for businesses, especially those relying on customers coming into the neighborhood from surrounding areas, and the availability of parking will be impacted during construction. NYSDOT indicates in the DEIS that it will work with contractors to determine an appropriate handling of contractor parking during construction including shuttling where appropriate. We encourage NYSDOT to find parking solutions that prioritize maintaining parking in and around businesses for their patrons.

- Urban design

    - We would like to see additional effort put into refining the project's urban design context/elements to better interface with surrounding neighborhoods including, but not limited to, the Near Northside, Hawley Green, and Washington Square. These designs should pay particular attention to elements of the project that must be human scaled, including but not limited to sidewalks, bike infrastructure, transit amenities (bus stop shelters, signage, etc.), landscaping (street trees, plantings, etc.). It is critically important to design for the positive experience and perceptual characteristics of users waiting for a bus, walking, or bicycling as well. For a large percentage of travelers in the Northside, these options may be their only viable mode of transportation.

    - North State and North Salina streets
        - We understand the project will include changes to these corridors, including a reduction of the number of travel lanes on North State Street. We request that NYSDOT make these changes to complement the improvements the city made to North Salina Street by providing ample sidewalks, street trees, pedestrian-scaled lighting, and on-street parking.

    - More attention to pedestrian and bicycle facility design

        - Studies have shown that the width of lanes influence the speed at which drivers will travel. We strongly believe that NYSDOT should be designing maximum 11' wide travel lanes on at-grade streets designed for vehicular travel speeds of 30 MPH, including but not limited to North Clinton, North State, and North Salina streets.

- Land use/redevelopment

    - We appreciate NYSDOT's openness to returning land to the city for redevelopment, including but not limited to the former Butternut and North State Street on-ramp Right of Way (ROW). We request that the NYSDOT work as quickly and efficiently as possible to return this land to the city and empower the land use working group comprised of local stakeholders with the ability to make land use planning decisions.

Please contact the Northside Business Partnership if you would like to discuss any of the above or other items that impact the Northside business community. We look forward to working with you.

Sincerely.

Gina Santucci
President, Northside Business Partnership

From:	Frechette, Mark (DOT)
To:	Bjorness, Joan E (DOT)
Subject:	FW: Northside UP / Franklin Square I-81 working group 2021 DEIS comments
Date:	Thursday, October 14, 2021 2:50:48 PM
Attachments:	2021 NsUP Franklin Sq DEIS Comments_FINAL.pdf image008.png

Comment

From: Jonathan Link Logan <jlinklogan@centerstateceo.com>
Sent: Thursday, October 14, 2021 2:15 PM
To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>
Cc: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>
Subject: Northside UP / Franklin Square I-81 working group 2021 DEIS comments

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Attached please find the Northside UP / Franklin Square I-81 working group's comments on the 2021 Draft Environmental Impact Statement for the I-81 Viaduct Project. We appreciate the opportunity to provide comments, and look forward to the FEIS and Record of Decision.

Cheers,
Jonathan

Jonathan Link Logan (he, him, his)
Director
Northside UP | Economic Inclusion

CenterState Corporation for Economic Opportunity
115 W. Fayette Street
Syracuse, NY 13202-3305
(315) 532-2464 cell phone
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www.centerstateceo.com

October 14, 2021

Mr. Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Mr. Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

RE: Northside UP / Franklin Square I-81 Working Group 2021 Draft Environmental Impact Statement (DEIS) Comments

Dear Mr. Frechette and Mr. Marquis:

The Northside UP / Franklin Square I-81 working group, consisting of stakeholders and residents of the Northside and Franklin Square neighborhoods, offers its support of the Community Grid. While there is more work to be done to make the Community Grid alternative the best that it can be, we feel the decision to choose it as the preferred alternative is the right one. We believe this is the best solution to achieve the goals of the I-81 Viaduct Project while also learning from past mistakes made when the highway was originally built. We also recognize it is the only alternative that takes demonstrable steps to address the racial and environmental justice issues created by and embodied in the presence of the existing viaduct. We appreciate the work that NYSDOT has put into listening to community concerns and incorporating this feedback into the project. We encourage it to continue to do so as the NEPA process moves toward the Record of Decision.

While our comments below are focused on elements of the project in the Northside and Franklin Square neighborhoods, we contend several of them, including but not limited to the highlighted urban design principles, noise barrier location, and construction management, apply throughout the entire project area. We implore NYSDOT and their design team to incorporate these ideas throughout the project area.

- **The fourth lane on Northbound Business Loop 81 between I-690 and Hiawatha Boulevard**
    - We understand the decision to add the fourth lane is to facilitate efficient and safe traffic patterns due to the redesigned merge of I-690 and the Pearl Street on-ramp into Business Loop 81 in the northbound direction. While we do not want to prolong or recreate dangerous driving conditions (weaving, excess speed, unsafe merges, etc.), we also want to ensure every possible solution is explored to right-size the system prior to expanding the highway through the Northside and Franklin Square.
        - We request NYSDOT incorporate congestion management best practices in an effort to not require expansion of the highway, which studies show will ultimately create

"induced demand", adding congestion on the highway over the long term.[1] The Syracuse Metropolitan Transportation Council (SMTC) report *Congestion Management Process – 2019 Status Update* prioritizes Transportation Systems Management and Operations (TSMO) improvements such as Traffic Incident Management, Access Control and Management, Signalization and Control above solutions that physically add capacity.[2] We also contend that our following recommendations pertaining to pedestrian, bicycle, and transit facilities and services improvements would apply to a systems-wide approach to addressing congestion.

- **Urban design**
  - We would like to see additional effort put into refining the project's urban design context/elements to better interface with surrounding neighborhoods including, but not limited to, the Near Northside, Franklin Square, Hawley Green, and Washington Square. These designs should pay particular attention to elements of the project that must be human scaled, including but not limited to sidewalks, bike infrastructure, transit amenities (bus stop shelters, signage, etc.), landscaping (street trees, plantings, etc.). It is critically important to design for the positive experience and perceptual characteristics of users waiting for a bus, walking at 3-4 miles an hour, or bicycling at 10 – 15 mph as well. For a large percentage of people in the Northside and in other parts of the project area, these options may be their only viable mode of transportation.
  - We appreciate the incorporation of pedestrian and bicycle facilities with reduced vehicular travel lanes on the Butternut and Spencer street bridges. We feel more detail is warranted to promote positive walking and cycling experiences on these bridges, as well as the Court and Bear street bridges. The DEIS makes minimal mention of how these areas will be refined and urban design ideas incorporated. We believe it is critical to create the best possible pedestrian and bicycle experience in these locations to increase the connection between the Northside, Franklin Square, and Inner Harbor neighborhoods, particularly in light of the recent proposed Inner Harbor aquarium project. More generous sidewalk widths, bollards, landscaping, noise barriers, pedestrian-scaled lighting, and other elements are requested to create the sense and reality of safety and to acknowledge people walking and bicycling are important within this multi-modal system. While the amenities found on East Spring Street bridge[3] over I-71 in Columbus, OH, may not be practical in Syracuse, we believe well-designed multi-modal transportation options accommodating our winters are possible and need to be incorporated into the final design. A local example of this is the Bridge Street overpass near the New York State Fair that was recently reconstructed as part of the Empire State Trail System.[4] See Figures 1a and 1b for images that illustrate the basic design of this local example.

---

[1] Please reference the following article for a more complete overview and reference list: Schneider, Benjamin. (2018). "CityLab University: Induced Demand" https://www.bloomberg.com/news/articles/2018-09-06/traffic-jam-blame-induced-demand

[2] https://2z5ifp15gecb2z5r2a2w9r8x-wpengine.netdna-ssl.com/wp-content/uploads/2019/12/2019-CMP-Final.pdf

[3] https://bit.ly/3i7uf79

[4] https://bit.ly/3DiLXNd

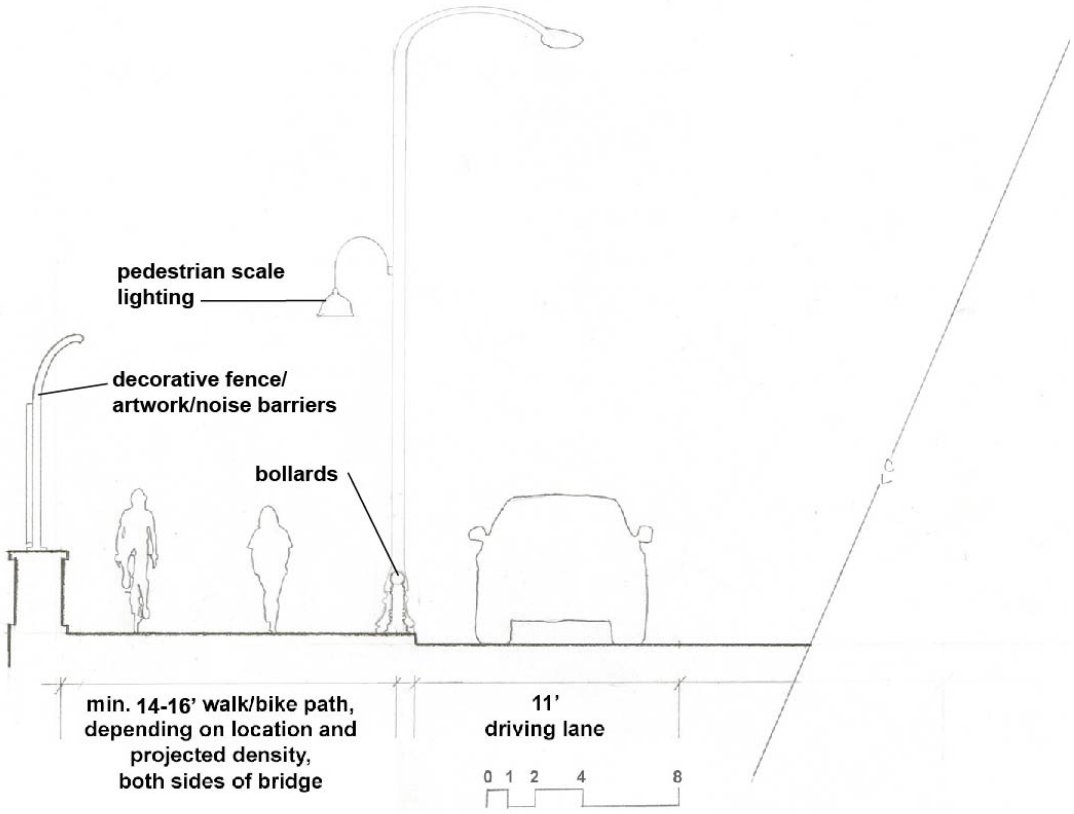

Figure1a - Bridges: Design to Support Pedestrian and Bicyclist Safety and Experience

Fig 1b Existing Pedestrian and Bicycle Facilities - Bridge Street, Rt 297 Solvay

- The underpasses of bridges carrying the highway over grade-level streets, such as those under I-690 between Franklin Square and Armory Square, Northside/Hawley Green and Downtown/Eastside require more details in their efforts to provide safe, interesting pedestrian and bike friendly environments in addition to meeting vehicular needs. These and other underpasses should be designed to feel and be safe, well-lit, and friendly/inviting for pedestrians and cyclists. Ample sidewalks, bike lanes (where appropriate), weather and snow barriers protecting pedestrians, and areas for road debris and snow to be collected are elements that should be provided. Bollards and low walls to act as barriers between travel lanes for vehicular and non-vehicular use should be considered. See figures 2a and 2b that illustrate these basic concepts and recommendations.[5]

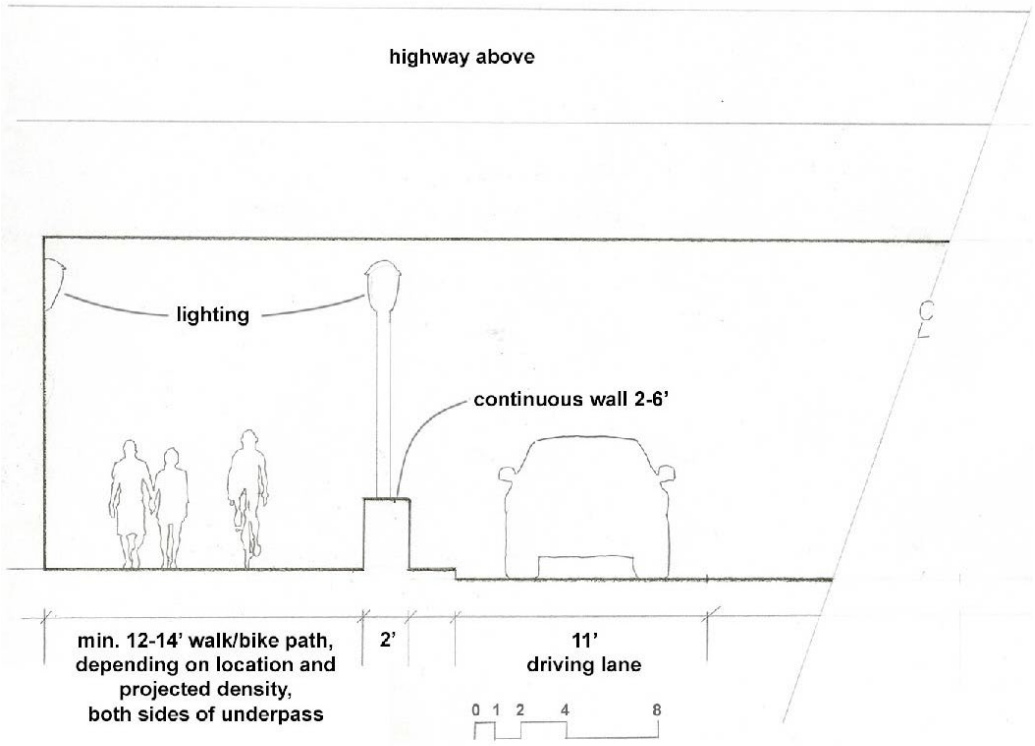

Figure 2a - Underpasses - Design to Support Pedestrian and Bicyclist Safety and Experience

[5] Walker, Alissa. (2016) "Now This Is How You Design A Freeway Underpass: A California city turns a dark tunnel into an inviting walkway." https://archive.curbed.com/2016/8/11/12441906/freeway-underpass-california-walking

Figure 2b Supportive Pedestrian and Bicycle Facilities through Underpass. City of Campbell, CA
https://archive.curbed.com/2016/8/11/12441906/freeway-underpass-california-walking

- Studies have shown that the width of lanes influence the speed at which drivers will travel, resulting in increased accidents and fatalities. We strongly believe that NYSDOT should be designing maximum 11' wide travel lanes on at-grade streets designed for vehicular travel speeds of 30 MPH, including but not limited to North Clinton, North State, and North Salina streets.
- We appreciate the inclusion of sidewalks along all local roads as they are the minimum level of accommodation for the safety of people walking or in wheelchairs. It is unclear how sidewalk widths are determined although we presume it is based on anticipated demand and scale of the setting. We recommend that the width of sidewalks also be based on the proximity of the sidewalk to moving vehicles and the anticipated amount of vehicular traffic.
    - "Primary" sidewalks are those located in high vehicular traffic areas where people walking may feel intimidated or threatened by the speed of passing cars and should be a minimum of 12 to 14 feet wide to allow pedestrians to walk further away from the street edge if desired. See Figure 3a.

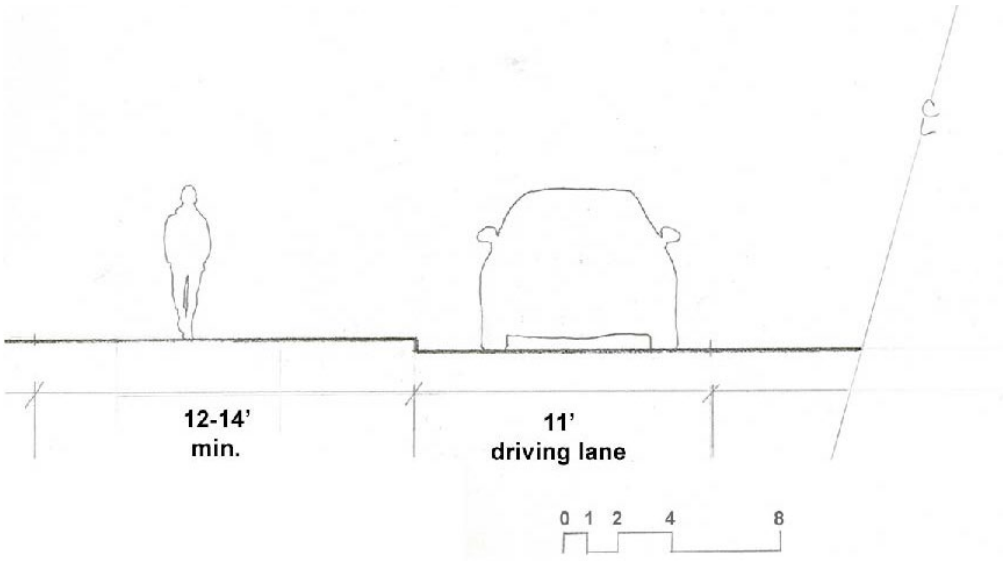

Fig 3a Primary Sidewalks adjacent to streets with higher traffic volumes

- "Secondary" sidewalks are those located along lower vehicular traffic areas, with a "tree lawn" buffer between the sidewalk and the street. We recommend a minimum sidewalk width of 6 feet, as the 5 foot standard does not comfortably accommodate two people walking side by side. See Figure 3b.

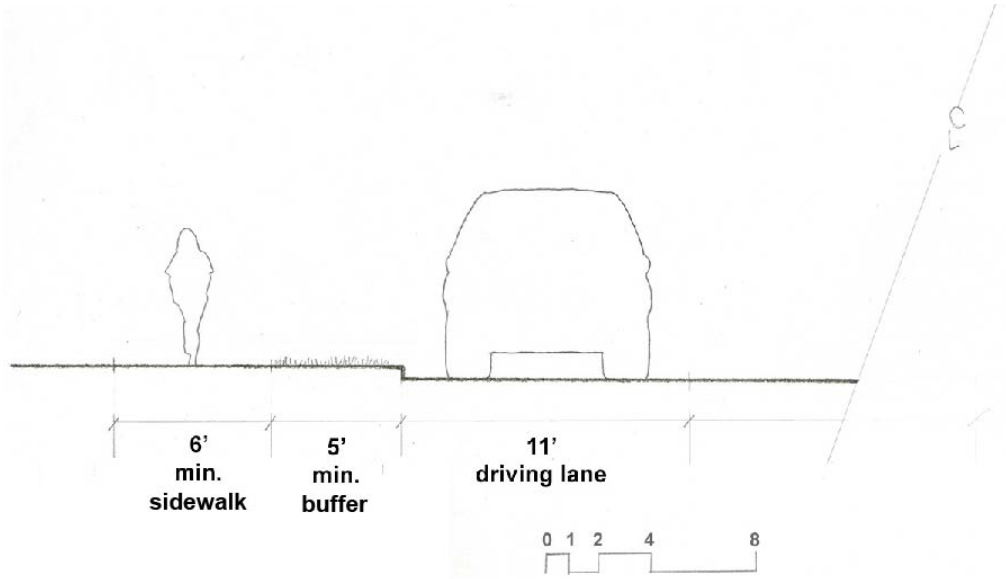

Fig 3b Secondary Sidewalks adjacent to streets with lower traffic volume

- We request that NYSDOT install Leading Pedestrian Interval (LPI) signals at all intersections to enhance the visibility of pedestrians in the intersection and reinforce their right-of-way over

turning vehicles as LPIs have been shown to reduce pedestrian-vehicle collisions by as much as 60%.[6]

- Hiawatha Boulevard & Park Street corridors
  - The proposed relocation of the Court Street on-ramp to Bear Street redirects non-Business Loop traffic to use Park Street to access Onondaga Lake Parkway, Old Liverpool Road and Buckley Road. This will increase traffic through a series of intersections along and around the Hiawatha Boulevard corridor that are already very unfriendly to pedestrian and bicycle traffic. We request that NYSDOT investigate and implement improvements to the Park Street and Hiawatha Boulevard corridors prioritizing pedestrian and bicycle safety, mitigating negative impacts of increased traffic on pedestrian, bicycle and transit users. NYSDOT should work with SMTC, the City, and other partners to refine and implement suggestions made in the 2020 *RTC/Market Area Mobility Study.*[7] At a minimum, improvements for pedestrian and bicycle safety to the following intersections should be implemented:
    - Hiawatha and Lodi
    - Hiawatha and Park
    - Hiawatha and Carbon
    - Park and NBT Bank Parkway/Harborside Drive

    Additionally, Hiawatha Boulevard is a direct connection between the Northside and Destiny USA. Existing pedestrian and bicycle transportation infrastructure is minimal, unsafe and unfriendly. We request incorporating improvements akin to those made to the Hiawatha Boulevard bridge over Onondaga Creek to extend a shared use path between the existing Onondaga Creekwalk at the Destiny USA Sky Bridge and Lodi Street to increase safety and friendliness of this pedestrian and bicycle space.
- Bear Street corridor
  - We believe improved bike and pedestrian facilities on the Bear Street bridge over Onondaga Creek are necessary to better facilitate connections between the Creekwalk and the new sidewalks being added by the project to Bear Street. The width of the Bear Street bridge over the Onondaga Creek appears wide enough to accommodate wider sidewalks similar those recently added to the Hiawatha Boulevard bridge over Onondaga Creek.
- Crouse / Irving interchanges
  - We recognize and appreciate the importance of the new Crouse and Irving interchanges for dispersing traffic across the Community Grid. We feel it is important to make sure that the residents of the Hawley Green neighborhood, some of whom are college students that walk or bike to the Hill, are presented with a design that is respectful of their neighborhood while meeting the needs of drivers. We believe the current design prioritizes vehicular traffic over the residents by not providing the following:
    - Sidewalks on both sides of Crouse Avenue at the onramp to I-690. We believe people will walk on the east side of the street regardless of the presence of a sidewalk so it would be safer to intentionally design one to accommodate this

[6] https://nacto.org/publication/urban-street-design-guide/intersection-design-elements/traffic-signals/leading-pedestrian-interval/

[7] https://2z5ifp15gecb2z5r2a2w9r8x-wpengine.netdna-ssl.com/wp-content/uploads/2020/10/RTC-Market-Area.pdf

activity. Additionally, the underpass should be designed to address safety and enhance user experience as described above.
        - Sound barriers along the length of exit and entrance ramps to reduce noise and other negative impacts on quality of life for neighbors and businesses.
    - North State and North Salina streets
        - We understand the project will include changes to these corridors, including a reduction of the number of travel lanes on North State Street. We request that NYSDOT make these changes to complement the improvements the city made to North Salina Street by providing ample sidewalks, street trees, lighting, and on-street parking.
    - North Clinton Street
        - The current plans show a sidewalk provided on only one side of North Clinton between Bear and Court streets. We've observed numerous local instances where sidewalks haven't been provided in unsuccessful efforts to discourage pedestrian traffic and feel this will be no different. We encourage NYSDOT to install sidewalks on both sides of the street, creating a plan that addresses pedestrian safety related to vehicles existing or entering the highway at the new Bear/Clinton Street ramp from SB Business Loop 81.
        - The DEIS indicates that a roundabout may be considered in final design at the existing intersection of North Clinton with Court Street, which we support doing. We also encourage NYSDOT to evaluate if what will essentially be a stub of Court between North Clinton and Genant Drive is necessary to maintain or if this should be returned to the city or the adjacent property owners.
- **Noise barriers**
    - We appreciate the change in approach from "opt in" to "opt out" when voting for the installation of the noise barriers. We also respect and understand the need to use the quantifiable "feasible and reasonable" criteria for assessing where noise barriers will be most effective in mitigating impacts created by the existing or proposed highway. However, we also acknowledge that the barriers also provide quality of life (sound & visual) benefits that are not quantified in the "feasible and reasonable" criteria. Barriers prevent the visual and physical presence of the highway from detracting and devaluing adjacent properties. In doing this, an opportunity is created for vacant, underutilized, and/or dilapidated properties to be revitalized. We believe there are additional areas north of I-690 that require noise barriers to return undervalued properties back to productive use or prevent a decline in quality of life in adjacent properties including, but not limited to:
        - The exit ramp area along Sunset Avenue up to Bear Street
        - The elevated portion of 690 that is being reconstructed throughout the Northside and Franklin Square
        - Both sides of Business Loop in the "canyon" between 690 and Hiawatha Boulevard.
        - The exit and entrance ramps associated with the Crouse / Irving interchange along Burnet Avenue.
        - The Butternut, Spencer, Court and Bear street bridges – see Figure 4 as an example.

Figure 4 Bridge with artistically rendered noise barriers. [8]

Communities throughout the country have constructed noise barriers in similar dense urban environments and a reconstruction project of this size and scale should be able to find ways to incorporate these barriers to enhance the quality of life along the highway's current and future route.

- **Land use/redevelopment**
  - We appreciate NYSDOT's openness to returning land to the city for redevelopment, including but not limited to the former Butternut and North State Street on-ramp Right of Way (ROW). We request that the NYSDOT work as quickly and efficiently as possible to return this land to the city and empower the proposed land use working group comprised of local stakeholders with the ability to make land use planning decisions.
- **Lodi Street Overlook**
  - We encourage NYSDOT to directly engage with the Washington Square neighborhood groups to understand their desire to create this space or if there are other ideas that might be more desirable or appropriate. While we will ultimately defer to the Washington Square residents' wishes, we understand there are recurring and on-going issues with large groups gathering late at night and early in the morning in the neighborhood in places that are hard to monitor. These groups frequently cause problems due to illegal activities, disturbing the lives of nearby residents. We feel that it is imperative that the Overlook is designed to be defensible and deter crime. We encourage NYSDOT to work with the Syracuse Police Department to develop a plan reflective of Crime Prevention through Environmental Design (CPTED).

[8] https://www.mkskstudios.com/projects/i70-i71-long-street-bridge

- **Onondaga Creekwalk**
    - The plans indicate the creation of a Creekwalk path on the west side of the creek with a connection along Evans Street in Franklin Square. We would like clarification of the rationale behind this two-block Creekwalk extension, how it will be landscaped, and who will be required to provide maintenance.
- **Construction impacts**
    - It is important to provide accommodations for pedestrians, transit users, and bicyclists as well as vehicles during construction, a challenge highlighted during the work in downtown during the summer of 2021. This is especially important for people with limited mobility (i.e. those relying on wheel chairs or motorized scooters). We request more clarity on how these accommodations will be provided and, in instances where there are problems during construction, who will be accountable for addressing them.
    - Many of our small businesses are struggling because of the pandemic. A multi-year road reconstruction project, without proper planning and coordination to support small businesses, will only further hurt them no matter how great the project. We would like a clearer understanding of how NYSDOT and its contractors plan to give ample warning to businesses for activities impacting them and their customers.
    - The DEIS is unclear about the length of construction time during a given day. We request that construction hours be limited to 12 hours a day.
    - It appears that there will be impacts to mature landscaping and trees within the project area including, but not limited to, Franklin Square. We would like NYSDOT to review the planned tree removal with local neighborhood stakeholders prior to any removals. We request NYSDOT and its contractors to use replacement trees and landscaping of a size significant enough to create an established feel to these spaces upon completion of the project.
    - It seems reasonable to expect that Burnet Avenue will receive an increase of traffic during construction (regardless of if it is a designated detour route or not) as well as after. We would like to see improvements made to the street in preparation for this additional traffic, including to pedestrian, transit, and bicycle facilities.

The Northside UP / Franklin Square I-81 Working group would again like to thank NYSDOT for their creative work on this project and remain open to further discussion as it moves toward implementation. We believe with the above comments addressed, and the principles applied throughout the project area, the Community Grid will stand as a model project for communities across the US looking to remove their urban highways.

Sincerely,

Jonathan Link Logan
Director, Northside UP

George Angeloro, Northside Business Partnership
Bob Haley, Urban Design Center
Mike LaFlair, Housing Visions Unlimited
Maren King and Paul Shubmehl, Mission Landing
Andrea Wandersee and Tysha Martin, NEHDA

Interstate 81 Viaduct Project no ag district determination

Littrell, Judy (AGRICULTURE) <Judy.Littrell@agriculture.ny.gov>

Wed 9/1/2021 11:51 AM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>

1 attachments (131 KB)

Interstate 81 Viaduct Project no ag district determination.pdf;

Please accept this letter from the Department of Agriculture and Markets.

Judy Littrell
Senior Environmental Analyst

NYS Department of Agriculture and Markets|Division of Land and Water Resources
10B Airline Drive, Albany, New York 12235
(518) 457-6320 | Judy.Littrell@agriculture.ny.gov
http://www.agriculture.ny.gov

NEW YORK STATE OF OPPORTUNITY. Agriculture and Markets

KATHY HOCHUL
Governor

RICHARD A. BALL Commissioner

September 1, 2021

Mark Frechette, P.E.
NYSDOT Region 3
333 East Washington St
Syracuse, NY 13202

RE: Interstate I81 Viaduct Project, Onondaga County

Dear Mr. Frechette,

Thank you for sending the Department a description of the reference project.

Based upon the information provided, it appears that the affected land is not located within a county adopted, State certified, agricultural district.

If you have any questions concerning this matter, please contact me at (518) 457-6320.

Sincerely,

Judy Littrell, Sr. Environmental Analyst

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 7
615 Erie Boulevard West, Syracuse, NY 13204-2400
P: (315) 426-7438 | F: (315) 426-7425
www.dec.ny.gov

September 13, 2021

Angelo Trichilo, P.E.
Deputy Chief Engineer
Acting Director, Office of Environment
NYS Department of Transportation
50 Wolf Road
Albany, NY 12232

RE: Response to the Draft Design Report / Draft Environmental Impact Statement for the I-81 Viaduct Project

Dear Mr. Trichilo:

This letter provides our response to the Draft Design Report / Draft Environmental Impact Statement for the I-81 Viaduct Project.

Stormwater

Non Point Source:

1.) Section 5.5.3, Table 5-44, Note 3 – Indicates that minimum runoff reduction volume is calculated in accordance with the NYSDEC Stormwater Management Design Manual. It is understood WQv was calculated per NYSDOT Chapter 8, Appendix B; however, please indicate the WQv is also calculated with standards that are consistent with the NYSDEC Stormwater Management Design Manual.
2.) Section 5.5.3, page 5-129 references outdated stormwater permit GP-0-15-001. This should be updated to reference Permit GP-0-20-001.

Point Source:

3.) Page 5-70: The City of Syracuse is not a respondent of the Order on Consent mentioned on this page. See comment #4, below.
4.) Page 6-339: (See comment #3, above.)
5.) Page 5-71: Please confirm that Harbor Brook is receiving stormwater from I-481. Harbor Brook is located south and west of the I-81 Central Study Area.
6.) Page 5-131: Please estimate the additional volumes of runoff to the combined sewer if the Viaduct Alternative is implemented.
7.) Page 5-134: If hydrodynamic treatment systems are installed, which municipality or State government will be responsible for operation and maintenance (O & M)?

Natural Resources:

Summary of Map Reviews:

8.) There were several locations where the regulated adjacent area (AA) was shown crossing roads. Regulated adjacent areas end at the edge of existing pavement on paved roadways and do not cross over into the medians.

Summary of General Review - Wetlands

9.) Wetlands identified using the 2020 Preliminary Wetland Mapping and Assessment Methodology (Appendix I-2) and which were verified, will need a better description of the verification process. Will these wetlands be delineated in the 2021 field season?

10.) Wetland nomenclature which gives the same identifier to wetland areas with hydrologic connections makes reviewing difficult. Since not all hydrologic connections confer regulated status to connected wetlands, it would help the review process if the wetlands were individually labeled. This is a particular problem with Wetland 10 where there are many wetlands all labeled Wetland 10. It makes it hard to pinpoint a particular location. DEC wetland identifiers should be clearly labeled on maps in addition to the labeling system used by the consultant.

11.) Article 15 wetlands - There were a few locations along navigable streams with riparian wetlands which are at least partially inundated during MHWL events. These wetlands would be regulated by Article 15. Article 15 wetlands do not have regulated adjacent areas. Ley Creek, Butternut Creek and Onondaga Creek are identified in the DEIS as meeting the criteria for DEC navigability.

Summary Review - 6-4-71.2 Surface Waters

12.) In the narrative and tables, Butternut Creek is shown as class C. It has a C(T) section, south of East Genesee Street which would require different work timing than the class C section. This will have a bearing on Table 6-4-7-2 and possibly affect the standards for some parameters because of a different “best use”. This correction of the standard will be pertinent to allowable work timing and the jurisdictional area (top of bank vs MHWL). The timing for “C” and “B” is different from timing for C(T) reaches.

13.) Other streams such as parts of Onondaga Creek, Butternut and Ley Creek would be clearly considered navigable and therefore could have Article 15 wetlands as described above. Meadow Brook Creek and Mud Creek are also described as navigable.

14.) For planning purposes, Class C(t) streams - work can occur between May 15 and October 1. Navigable Class C streams - work may occur between July 15 and March 15.

Threatened and Endangered Species:

15.) Tree cutting shall be done 11/1-3/31 to avoid impacts to bat species.

It seems that all appropriate potential permits have been identified.

Please contact me at 315-426-7440 or email at elizabeth.tracy@dec.ny.gov if you have any questions.

Sincerely,

Elizabeth A. Tracy
Regional Permit Administrator

ecc: Jon Adams, NYS DOT
M. Marko, Regional Director, NYS DEC
T. Vigneault, Regional Water Engineer, NYSDEC
M. Kazmierski, Division of Water, NYSDEC
V. Ellis, Division of Water, NYSDEC
J. Foley, Bureau of Ecosystem Health, NYSDEC
T. Bell, Division of Wildlife, NYSDEC

NEW YORK STATE OF OPPORTUNITY. | Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

July 28, 2021

VIA EMAIL

Mark Frechette, Project Director
NYSDOT Region 3, Central New York
State Office Building
333 E. Washington Street
Syracuse, NY 13202

Mr. Mark Frechette,

Our Office has reviewed the Draft Environmental Impact Statement (July 2021) for the Interstate 81 Viaduct Project (PIN #3501.60) for compliance with the Land and Water Conservation Fund (LWCF) Act of 1965, as amended. Our Office is designated by the Governor as liaison to the National Park Service (NPS), within the Department of the Interior, for purposes of administration and compliance with the LWCF.

In Section 06-4-2, “Parklands and Recreation Resources”, the DEIS notes that Forman Park has received LWCF assistance. We have determined that there are 12 outdoor recreation sites that have received such assistance within the Study Areas, including Forman Park. These are listed below with associated LWCF grant number(s).

- Clark Reservation State Park (36-00882A)
- Clinton Square (#36-00909A1)
- Columbus Circle (#36-00909A6)
- Fayette Park (#36-00909A5)
- Forman Park (#36-01058)
- Hanover Square (#36-00909A2)
- Huntington Park (#36-00906B)
- Onondaga Lake County Park (#36-00513, #36-00588, #36-00736, #36-01222)
- Old Erie Canal State Historic Park (#36-00214, #36-00273, #36-00882A)
- Pitts Park (#36-00909A4)
- Sunnycrest Park (#36-00836, #36-00906A)
- Vanderbilt Square (#36-00909A3)

If this Project has the potential to impact access or outdoor recreation opportunities at any of the above listed sites, please initiate consultation with our office.

Sincerely,

Diana Carter

Diana Carter

LWCF Alternate State Liaison Officer
Assistant Division Director for Planning
Division of Environmental Stewardship and Planning

CC:
Duane Owens, OPRHP, Central Region, Director
Ian Benjamin, OPRHP-DESP, Community Programs Coordinator

NYU | LAW

Clinical Law Center
245 Sullivan Street, Room 518
New York, New York 10012
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October 14, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

RE: The I-81 Viaduct Project DDR/DEIS Comment

Mr. Frechette and Mr. Marquis:

This comment is filed on behalf of the Civil Rights Clinic at NYU School of Law and the Center on Race, Inequality, and the Law at NYU School of Law. The Civil Rights Clinic works to promote and protect civil rights, and challenge issues of economic and political inequality, poverty, and racial injustice. The Center on Race, Inequality, and the Law confronts the laws, policies, and practices that lead to the oppression and marginalization of people of color. Together, we are invested in achieving racial, economic, and environmental justice for people of color in communities across the country, including members of the environmental justice community who are disparately impacted by the creation and placement of I-81.

The redevelopment of I-81 in Syracuse presents the New York State Department of Transportation ("NYSDOT") and the City of Syracuse with a once-in-a-generation opportunity: the chance to rectify the historical and ongoing harms created by I-81 and to show other cities how modern infrastructure can be used as a restorative tool for impacted communities.[1]

Of the three options presented, the expanded viaduct is the least likely to remedy the damage caused by I-81 and would only further reinforce the racialized poverty, isolation, and lack of

[1] For the purpose of this comment, "impacted community" refers to the Black Syracusans who live in proximity to I-81.

economic opportunities in south Syracuse. Likewise, the No-Build alternative would continue to generate the same harm to the impacted community. Therefore, we support the community-preferred Community Grid Alternative ("CGA") because it has the potential to help restore a community marginalized since the construction of the I-81 viaduct.

Although the CGA is the community-preferred alternative, the CGA, as currently proposed, still fails to adequately address the viaduct's legacy of racial segregation and disproportionate harm on Black communities in Syracuse. NYSDOT and the City of Syracuse constructed the I-81 viaduct in a way that physically, economically, and ecologically devastated the surrounding Black community for generations. Using the current project to repair the historical and ongoing harms is the agency's responsibility. NYSDOT must fulfill its legal obligations to the designated environmental justice community by: 1) recognizing and planning for the displacement that will occur with the removal of the viaduct; 2) engaging in anti-gentrification efforts; 3) implementing a community workforce agreement that includes a local hire agreement; and 4) finding an acceptable location for the proposed construction of a roundabout.

History and Demographic Information

Following World War II, Black Americans fled the South for economic opportunities in northern cities including Syracuse. Despite the absence of *de jure* segregation, widespread racial discrimination, including redlining, by private individuals, banks, and government officials forced the Black community into overcrowded neighborhoods. Black women worked service jobs, cooking, cleaning, and laundering clothes, while Black men worked as butchers, barbers, grocers, and repairers. One of these predominantly Black neighborhoods, the 15th Ward, eventually became the target of Syracuse officials hoping to cash-in on federal highway funds. By labeling Black communities as "slums," Syracuse paved the way for the viaduct that stands today.

In the 1950s, Mayor Donald Mead targeted the 15th Ward for redevelopment by eliminating the substandard housing Black families were forced into, effectively leaving them with even fewer options to find housing and community. Hundreds of homes, businesses and commercial properties were acquired during this "slum cleanup."[2] This redevelopment took the form of new housing projects and a new highway overpass which worsened overcrowding[3] and eliminated opportunities for Black families to own homes[4] and build intergenerational wealth.[5]

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[2] *See* David Haas, *Highway Robbery: The Razing of Syracuse's 15th Ward*, SYRACUSE NEW TIMES (Dec. 12, 2018), https://www.syracusenewtimes.com/highway-robbery-5-decades-ago-syracuse-neighborhoods-were-razed-to-construct-interstate-81/.

[3] *Id.*

[4] *See id.*

[5] Alana Semuels, *How to Decimate a City*, ATLANTIC 11 (Nov. 20, 2015), https://www.theatlantic.com/business/archive/2015/11/syracuse-slums/416892/ (explaining how Syracuse's

Despite the unpopularity of this plan with the majority of 15th Ward residents, Syracuse city officials sought minimal community input on the I-81 project. Instead, the plan moved forward without input from those most affected, and residents were notified only through printed handbills listing evacuation dates and a demolition timeline.[6] The City of Syracuse did not provide residents with replacement housing assistance, nor did it construct sufficient replacement housing. While the construction of the I-81 overpass would displace 3,337 families in three years, the city had only 718 units of potential state and federal housing to accommodate them.[7]

Ultimately, 103 acres of land were razed to make way for the viaduct.[8] Those displaced by its construction were given a market rate payout insufficient to attain housing in other areas of the city, forcing them to crowd into nearby neighborhoods and resulting in a decrease in quality of life.[9] These neighborhoods remain predominantly poor and isolated from the rest of Syracuse today largely due to NYSDOT's construction of the I-81 overpass. The presence of a highway so close to a community discourages business and investors, thus leading to a shortage of goods and services.[10] Due to being isolated as a result of I-81, the communities' available jobs are predominantly low-wage, meaning even with employment, many Syracuse residents are unable to make ends meet.[11] The median income in the rest of Onondaga County is 75% higher than Syracuse[12] and the unemployment gap between Syracuse and Onondaga County remains significant.[13]

The lack of real economic opportunity means that Black residents in Syracuse are living in poverty at rates more than three times that of white Syracuse residents.[14] This difference is more than twice as large as the comparable gap nationwide. Despite a recent decrease in the overall poverty rate of Syracuse, the number of neighborhoods with concentrated poverty has

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history of redlining and the building of I-81 led to modern inequities such as the home ownership rate of Black being 30% compared to the 70% home ownership rate of white residents).

[6] JOSEPH DIMENTO & CLIFF ELLIS, CHANGING LANES: VISIONS AND HISTORIES OF URBAN FREEWAYS 178 (2013).

[7] *Id.* at 179 (citations omitted).

[8] Urban Jobs Task Force, *Building Equity in the Construction Trades: A Racial Equity Impact Statement* 11-12, https://25bbda0e-cc99-49e6-97f1-223eb930a9ee.filesusr.com/ugd/eb7434_d04f3446e3124f89b20e18da694723a3.pdf.

[9] *See* Wendy Q. Xiao, *The Road to Racial Justice: Resolving the Disproportionate Health Burden Placed on Communities of Color by Highway Pollution*, 52.2 COLUM. HUM. RTS. L. REV. 912, 916 (2021).

[10] Urban Jobs Task Force, *supra* note 8.

[11] *Id.* at 21.

[12] Matt Mulcahy, *Report Finds Concentrated Poverty in Syracuse Still Getting Worse*, CNYCENTRAL (Oct. 20, 2020), https://cnycentral.com/news/local/report-finds-concentrated-poverty-in-syracuse-still-getting-worse.

[13] Urban Jobs Task Force, *supra* note 8 at 16.

[14] Frankie Jupiter, *By the Numbers: The State of Being Black in Syracuse*, CNYCENTRAL (Feb. 18, 2020), https://cnycentral.com/news/local/by-the-numbers-the-state-of-being-black-in-syracuse.

only increased.[15] As such, Syracuse is home to some of the most racially and ethnically concentrated areas of poverty in Onondaga County, including the neighborhoods lining I-81.

Environmental Racism and Injustice

Environmental racism is the process by which minority and underrepresented groups are targeted by the government to shoulder excessive pollution, public health dangers, and other environmental hazards resulting from the placement of large-scale infrastructure, including highways.[16] Environmental racism impacts the health of residents in the neighborhoods surrounding I-81 in various ways. The area surrounding the viaduct is exposed to a high level of lead from the lead paint and dust,[17] as well as other harmful emissions like carbon monoxide, benzene, and road dust.[18] The viaduct has also contributed to traffic-related air pollution in the immediate area, leading to higher rates of asthma, impaired lung function, heart failure, and even death among nearby residents.[19]

NYSDOT is legally obligated to approach this project in a way that addresses historical and contemporary harms to the south Syracuse community, including the effects of environmental racism. The CGA offers a way to restore what I-81 took from Black residents of Syracuse, if done with appropriate community oversight and modifications to the proposed plan. By taking ownership of these past mistakes, Syracuse and NYSDOT have the chance to avoid repeating history and shape the project according to the needs of the impacted community.

Pursuant to Title VI, NYSDOT is Obligated to Take Steps to Address Historic Discrimination and Mitigate Further Harms

Title VI of the Civil Rights Act of 1964 protects individuals and groups from discrimination on the basis of their race, color, and national origin in programs and activities that receive Federal financial assistance. Title VI defines "program or activity" to include "all of the operations of . . . a department, agency, special purpose district, or other instrumentality of a State or of a local government . . . any part of which is extended Federal financial

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[15] Mulcahy, *supra* note 12.

[16] Dylan T. Katz, The Interstate Highway System and Environmental Justice: Disproportionate Environmental Impacts on Low Income and Minority Communities (May 8, 2015) (B.A. thesis, Fordham University) (on file with Fordham University Library).

[17] Hazardous levels of lead are found adjacent to highways. Individuals living in these areas are more at risk of lead poisoning from lead particulates. *See e.g.,* Mark R. Hafen & Robert Brinkmann, *Analysis of Lead in Soil Adjacent to an Interstate Highway in Tampa, Florida*, 18 ENVIR. GEOCHEMISTRY AND HEALTH, 171, 177 (1996).

[18] *See* U.S. ENV'T PROTECTION AGENCY, BEST PRACTICES FOR REDUCING NEAR-ROAD POLLUTION EXPOSURE AT SCHOOL 2 (Nov. 2015), https://www.epa.gov/sites/default/files/2015-10/documents/ochp_2015_near_road_pollution_booklet_v16_508.pdf.

[19] *Id.* at 5-8.

assistance."[20] NYSDOT is a New York State agency and uses federal funding in connection to transportation infrastructure development, including for federal highway projects, so it is bound by Title VI.[21]

As a result, NYSDOT is obligated under Title VI to address and take action to overcome the historic discrimination described in the history portion of this comment.

> Where prior discriminatory practice or usage tends, on the grounds of race, color, or national origin to exclude individuals from participation in, to deny them the benefits of, or to subject them to discrimination under any program or activity to which this part applies, **the applicant or recipient must take affirmative action to remove or overcome the effects of the prior discriminatory practice or usage.**
> 49 CFR § 21.5 (b)(7) (emphasis added).

The discriminatory actions do not need to be intentional to violate Title VI. If a program or activity has an "unjustifiable impact on minorities [they can] be redressed through agency regulations designed to implement the purpose of Title VI."[22] A *prima facie* case of disparate impact can be found where a federal funding recipient "use[d] a neutral procedure or practice that has a disparate impact on protected individuals, and such practice lacks a substantial legitimate justification."[23] Thus, NYSDOT has an affirmative duty to not only avoid discriminating against Black Syracuse residents today, but also to ameliorate its well-documented legacy of past harms that continues to have affects today.

Pursuant to Executive Order 12898, NYSDOT is Obligated to Protect Environmental Justice Communities

Executive Order 12898, Federal Action to Address Environmental Justice in Minority Population and Low-Income Population, directs federal agencies to take the necessary steps to address the disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income communities. Environmental justice communities are minority or low-income communities. Minority communities are identified where either: 1) the minority population of the affected area exceeds fifty percent of the total population, or 2) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population. Low-Income Communities are census block groups with a greater proportion of residents living below the poverty levels than the City of Syracuse (31%).

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[20] 42 U.S.C. § 2000d-4a(1)(A).

[21] Title VI applies to highway construction. *See* 49 CFR § 21 (2021) App'x A, 1.

[22] *Alexander v. Choate*, 469 U.S. 287, 293 (1985) (discussing *Guardians Ass'n v. Civil Serv. Comm'n of N.Y. City*, 463 U.S. 582 (1983)).

[23] U.S. DEP'T OF JUSTICE, TITLE VI LEGAL MANUAL § VIII(B).

NYSDOT has designated the community on the southeast side of the viaduct as an "environmental justice community." Out of 186 census block groups affected by proposed construction, ninety-one were identified as environmental justice groups. Forty-four of the ninety-one environmental justice communities exceed both the minority population threshold and low-income population threshold. Nearly all of the Central Study Area and I-481 South Study Area is deemed an environmental justice population, while there are no environmental justice communities in the I-481 East or I-481 North Study areas.[24]

The Federal Highway Administration Order 6640.23, "FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations", set forth the following priorities: 1) avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations; 2) ensure the full and fair participation by all potentially affected communities in the transportation decision-making process, and; 3) prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations. This means NYSDOT must protect these communities from shouldering the disproportionate burden of the project's consequences. These include environmental and health concerns, as well as social isolation for nearby residents who will face significant obstacles in accessing parks, hospitals, and religious centers.

Further, Secretary of Transportation Pete Buttigieg recently reinstated the SEP-14 pilot program, which would allow for legally enforceable local hiring policies. Together, these federal actions require NYSDOT to approach contemporary infrastructure projects as a way to remedy past and ongoing harms caused by infrastructure. In the current EIS, NYSDOT has failed to meet this legal obligation to the environmental justice communities around I-81.

Pursuant to New York State Law, NYSDOT is required to protect low-income communities

New York State law also provides the southeast community with protections. The New York State Environmental Quality Review Act ("SEQR") mandates that existing community and neighborhood character be considered when new projects are planned. The displacement of low-income communities must be considered in new projects. SEQR requires NYSDOT to address the potential displacement of current residents by covering the costs of relocation or offering alternatives. The DEIS indicates there will be no residential displacement. However, the DEIS fails to consider inevitable temporary relocation due to the construction and does not sufficiently address the consequences of the construction leading to gentrification.

NYSDOT has a legal obligation to the communities affected by I-81. Despite progress made since the initial DEIS, NYSDOT has not met its obligations to the environmental justice

[24] U.S. DEP'T OF TRANSPORTATION, FED. HIGHWAY ADMIN. & N.Y. STATE DEP'T OF TRANSPORTATION, DRAFT ENVIRONMENTAL IMPACT STATEMENT AND DRAFT SECTION 4(F) EVALUATION figs. 6-2-3-2 & 6-2-3-3 (July 2021).

communities because it has failed to fully address the ramifications of what will directly result from its construction of the CGA.

Necessary Steps to Mitigate the Discriminatory Impact of the Current Community Grid Alternative Plan: Moving Towards Restoration and Equitable Remedy

Destabilization: To prevent the destabilization of the impacted community, NYSDOT and Syracuse must formally recognize and respond to displacement that will be caused by construction, engage in anti-gentrification efforts, and commit to requiring a local hire agreement with a third-party monitoring organization accountable to the impacted community

1. The Community Grid Alternative Must Not Become a Conduit for Displacement

NYSDOT has concluded that the CGA's displacement effects are limited to four commercial properties.[25] This ignores the reality that further displacement will likely occur as a result of the construction. Although no residents will be immediately displaced through right-of-way acquisition, the years of construction will disrupt nearby residents' daily activities and livelihoods. NYSDOT's construction will affect the ability of residents in the environmental justice communities to use Wilson Park, walk to school safely, and have ambulance access to some properties. Because this displacement will be the direct result of NYSDOT action, NYSDOT is responsible for recognizing this displacement in its final plans and mitigating its effects.

Before NYSDOT moves forward with construction, it must work closely with relevant agencies and affected residents to develop both temporary relocation and long-term right-of-return plans to ensure that all displaced residents have the right to return to their former neighborhoods once the construction is completed. For example, Austin City Council recently enacted a "Right to Stay and a Right to Return" policy that allows families currently living in the neighborhood to receive preferences for affordable housing options as the redevelopment of their local highway begins.[26] Through this policy, Austin took responsibility for past destructive urban policy decisions and adopted specific strategies that would reduce harms associated with redevelopment, including the development of a community land trust and housing policies that prevent the displacement of current

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[25] *Id.* at 6-137.

[26] Emily Nonko, *Austin Residents Will Have "Right to Return" in New Development for First Time*, NEXT CITY (Sept. 8, 2021), https://nextcity.org/urbanist-news/entry/austin-residents-have-right-to-return-in-new-development-for-the-first-time.

residents.[27] With the input of the impacted community, NYSDOT should consider and push for a similar policy for the local environmental justice communities.

NYSDOT has an historical and legal responsibility to protect the local community. It cannot wash its hands of the matter and leave zoning issues and the aftermath of construction to other governmental groups. Steps need to be taken prior to the construction of the CGA to ensure it will bring positive change for current residents rather than creating new difficulties for them to overcome.

2. The Community Grid Alternative Must Not Become a Conduit for Gentrification

Beyond the immediate harms of displacement, which NYSDOT has to some extent addressed, there are serious long-term questions about gentrification that have yet to be answered. While NYSDOT expects the CGA to buoy economic development on the Southside, this may not be good news for all residents. After the viaduct comes down, the area around the CGA will likely see a flurry of redevelopment efforts which could push any new economic opportunities out of the reach of impacted communities. As currently proposed, NYSDOT is laying the foundation for another harm, gentrification, to sweep through the environmental justice communities. Current residents are entitled to reap the benefits of a redeveloped neighborhood that is no longer physically isolated from the rest of the city. As such, it is incumbent on NYSDOT to plan now for the eventual return of these residents to a reimagined southern Syracuse. However, NYSDOT has not included any serious or realistic discussion of these impacts in its DEIS, nor has it attempted to mitigate the harms its actions will cause. Increasing property taxes, rent, and the cost of living—all caused by gentrification—will have major economic repercussions on current low-income residents.

Instead, and without any clear evidence, the DEIS has downplayed the effects redevelopment will have on current residents once the CGA is completed. NYSDOT concluded the CGA is "not anticipated to result in substantial gentrification" within the Project Area. But the CGA is designed to result in new development, which often increases property values and higher property taxes for current owners, raising rents, making housing too expensive for current residents. In Oakland, California, for example, the 2005 removal of a highway and construction of a street-level roadway led to a nearly 25% decrease in the local Black population as they were pushed out by new development and higher housing costs.[28]

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[27] *Id.* (citing Austin City Council's resolution).

[28] Andy Sullivan, *Divided Highway*, REUTERS GRAPHICS (May 25, 2021), https://graphics.reuters.com/USA-BIDEN/INFRASTRUCTURE-FREEWAYS/qzjpqbzzyvx/; Regan F. Patterson & Robert A. Harley, *Effects of*

The DEIS predicted an increase in property values but stopped short of addressing how this might impact low-income residents already living in the area. The DEIS has acknowledged community concerns and public comments but has not made concrete plans to address them. Vague promises about a community land use working group are a start, but NYSDOT must ensure that such groups are both representative of the environmental justice communities and truly empowered to protect them.

NYSDOT must ensure that the parcels made available after the viaduct's removal do not contribute to gentrification and displacement of more residents within the community. For example, Blueprint 15 plans to "transform" the East Adams Street community into a mixed-income neighborhood. Blueprint 15 seeks to deconcentrate poverty and aims to create a "neighborhood for all." However, this plan to deconcentrate poverty is designed to be achieved through the displacement of residents, likely the most economically vulnerable within the community. The residents displaced from Pioneer Homes, Central Village, and McKinney Manor will not all be able to return to their homes as there will not be one-to-one replacement of low-income housing in the new design.[29] The list for Section 8 vouchers has been closed for over ten years, with 3,000 people on the waitlist, yet the proposed plan replaces some low-incoming housing with market-rate housing and commercial space. Changing the demographics of the impacted communities will not improve the conditions of those who were directly affected by the construction of the viaduct; instead, it will only repeat the problems created by the initial construction of I-81.

NYSDOT must speak with Southside residents and community leaders to ensure its plan will spur economic growth and stability in Syracuse *without* pushing out marginalized communities of color through gentrification. Anticipated economic growth should flow towards, and not away from, the Black community most impacted by the I-81 replacement. We recommend using the following recommendations from the 2020 Analysis of Impediments to Fair Housing Report to protect low-income residents from the threat of displacement through gentrification.

The foremost action that NYSDOT can and should take is establishing a community land trust ("CLT") for any land it currently owns that will not become part of the community grid. A community land trust would put control over this land back in the hands of residents. A CLT is a non-profit corporation that places control of land that it owns under a board of trustees that are representative of the community that lives on the land.

Freeway Rerouting and Boulevard Replacement on Air Pollution Exposure and Neighborhood Attributes, INT'L J. ENV'T. RSCH. AND PUB. HEALTH, Nov. 2019, at 9.

[29] Annabel Hine Otts, *Will Blueprint 15 Build a True Neighborhood and City "for all"? Let's Have a Conversation*, URB. CNY (Feb. 26, 2019), https://www.urbancny.com/will-blueprint-15-build-a-true-neighborhood-and-city-for-all-lets-have-a-conversation/.

For Syracuse, this would mean that NYSDOT, the current owner of the land, would give or sell the land to a group of individuals who are residents of and demographically representative of the environmental justice communities along the proposed CGA. This board of trustees would be responsible for stewarding the land and ensuring that it benefits the existing community members. It would also stabilize changes in land value related to any inflow and outflow of residents, particularly selling homes or land permits that permit reselling at exorbitant prices. Examples of CLTs abound nationally. As previously stated, a key component of Austin's recent "Right to Stay and Right to Return" policies is the creation of a CLT that will include housing units that an owner can pay for while the CLT owns the land.[30]Another recent example is the Houston Community Land Trust ("HCLT"), established with support from local government bodies like the city's Housing and Community Development Department.[31] The HCLT aims to build and sell approximately 1,000 new homes with protections on affordability by 2024. As participants in the HCLT, homebuyers commit to an agreement that if they sell their home, they will do so at a price that remains affordable for others earning around the Houston area's median income.

Establishing a community land trust is a direct action that NYSDOT can take because it is the owner of the land that would be stewarded by the trust. Questions of zoning authority or relationship with the City of Syracuse are irrelevant here because of NYSDOT's ownership of the land.

Other recommendations that NYSDOT can act upon to fulfill its obligation to the environmental justice communities of Syracuse are:

- Require the provision of affordable housing as part of any residential development on land made available for redevelopment along I-81 viaduct corridor.

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[30] Audrey McGlinchy, *People with Ties to a Gentrifying Neighborhood to Get a Better Shot at Affordable Housing,* KUT 90.5 (Nov. 8, 2019), https://www.kut.org/austin/2019-11-08/people-with-ties-to-a-gentrifying-neighborhood-to-get-a-better-shot-at-affordable-housing.

[31] Leah Binkovitz, *At One Year, Houston's Community Land Trust Charts Progress, Confronts Questions*, URB. EDGE (June 18, 2019), https://kinder.rice.edu/urbanedge/2019/06/18/one-year-houstons-community-land-trust-charts-progress-confronts-questions; News Release, City of Houston Closes First Land Trust in New Home Development Program, City of Houston (June 7, 2019), https://cityofhouston.news/news-release-city-of-houston-closes-first-land-trust-home-in-new-home-development-program/; HOUSTON HOUS. AND CMTY. DEV. DEP'T, COMMUNITY LAND TRUST BUSINESS PLAN (Dec. 2016), https://www.houstontx.gov/council/committees/housing/20170201/community-land-trust.pdf.

- Create policies and programs to increase the development of affordable housing in areas that have seen an increase in the development of market-rate and luxury housing, such as Downtown, the Inner Harbor, and the University Neighborhood."[32]
- Work with the City of Syracuse to immediately create an oversight board made up of residents from the impacted community, to report on the success of these programs and requirements. Unlike the proposed "land-use working group," this board should have significant input on any rezoning, including the ability to veto rezoning proposals entirely.

3. NYSDOT and Syracuse Must Adopt a Community Working Agreement that Incorporates a Priority Labor Agreement

In May 2021, Secretary of Transportation Pete Buttigieg announced programs under the FHWA and FTA that include support for hiring local residents for infrastructure programs.[33] This is an opportunity for NYSDOT to provide an economic benefit to the community that has been economically disadvantaged by I-81 and to serve as a national model for hiring locally. An effective hiring strategy will include, at the very least, a Community Workforce Agreement ("CWA") with a specified Project Labor Agreement ("PLA") that governs the work conditions, pay, and structure of construction projects, and would be made between the NYSDOT and local unions.

Per the Urban Jobs Task Force, a PLA has key benefits:

- "**Uniformity** – in wages, benefits, overtime pay, hours, working conditions, work rules;
- **Reliability** – a reliable, uninterrupted source of qualified workers at predictable costs in wages and benefits;
- **Single Management Standard** – a single collective bargaining agreement eliminates varied wage and benefit structures, with a single expiration date for the agreement;
- **Timeliness** – predictability and a single management standard make on-time, on-budget completion more likely;
- **Dispute Resolution** – provide both 'binding procedures for resolving labor disputes that may arise' and 'other mechanisms for labor and management cooperation on … productivity, quality of work, safety, and health;'

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[32] CNY FAIR HOUS., ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING SYRACUSE AND ONONDAGA COUNTY 2020, https://www.cnyfairhousing.org/copy-of-analysis-of-impediments-202.

[33] U.S. Dep't of Transportation, *U.S. Department of Transportation Announces Expanded Local Hire and Workforce Development Pilot Program* (May 19, 2021), https://www.transportation.gov/briefing-room/us-department-transportation-announces-expanded-local-hire-and-workforce-development.

- **Safety Standards** – require 'contractors and workers to comply with project safety rules;'
- **Quality of Workmanship**"[34]

A critical part of a successful PLA would be a requirement that a certain percentage of the construction workforce is constituted of residents from specific zip codes. In considering how "local" is defined, it is standard practice to use specified zip codes from around the construction site. This is an essential distinction. "Local" cannot be defined as the greater Central New York area because the harms created by the I-81 viaduct have been concentrated on very specific communities whose racial and ethnic concentration are unique to south Syracuse. NYSDOT should define local using the zip codes of the environmental justice communities and immediately adjacent areas. Given the severity of these harms, a substantial percentage of the construction workforce should be required to come from these impacted communities. Based on community input at public hearings regarding I-81 redevelopment, "substantial" would mean approximately 30% of hires coming from majority Black communities near the I-81 viaduct.

There have been many successful implementations of CWAs that incorporate PLAs nationwide. One prominent example is Los Angeles. Los Angeles has negotiated CWAs on a variety of public works projects. The Partnership for Working Families notes that, in Los Angeles, "in 2010, six CWAs [were] in effect, covering over $375 million in construction value and over 7500 construction jobs. The agreements vary slightly but tend to require 30-40% of new construction jobs created to be filled by residents of neighborhoods adjacent to the project. The agreements establish further requirements that 10–15% of construction work hours be performed by at-risk workers, including workers from poor households and workers with a history of incarceration or recipients of public assistance, among other things."[35]

Such a program, which has been successful elsewhere, would help rectify the economic destruction caused by I-81's creation. Offering a CWA that incorporates a PLA could serve as a career entry point for young Syracuse residents and those currently locked into low labor work. By receiving priority on these construction jobs, Syracuse residents will have access to local training and jobs that would provide them greater economic stability, including a livable wage, health benefits, and retirement assistance.

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[34] Urban Jobs Task Force, *supra* note 8 at 48.

[35] *Policy & Tools: Community Workforce Agreement Examples*, P'SHIP FOR WORKING FAMS., https://www.forworkingfamilies.org/page/policy-tools-community-workforce-agreement-examples (last visited Oct. 4, 2021).

Health Concerns: To ensure the CGA provides a better quality of life for impacted residents, NYSDOT must hire a third-party to monitor the environmental impact, involve community members in oversight, and better protect community institutions

NYSDOT and Syracuse must do more to reduce the harm that will accompany construction. First, NYSDOT should commit to greater protections for local community resources that will be directly impacted by the CGA. Of primary concern is Wilson Park, one of the only public parks in the neighborhood, that will be severely disrupted by construction as it becomes an active staging site. Users of Wilson Park, especially children, are already exposed to high levels of traffic-related pollution because of its proximity to the viaduct.[36] Using Wilson Park as a staging site for construction will only worsen the negative health impacts on park goers.

Though NYSDOT recognizes the physical impact this staging site will have on the usage of some park amenities, it still plans to keep the park open and try to ameliorate these concerns by constructing a new basketball court. This solution does nothing to protect the users of the park, especially children, from pollution, dust, and other hazards from the construction. It is apparent that NYSDOT did not consider ways to ensure that Southside residents can access amenities similar to those at Wilson Park, but in a safer location. NYSDOT should reconsider this solution and instead construct an alternative, safer park for the use of residents during construction and beyond. If the construction of such an alternative park is not possible, NYSDOT should reconsider the use of Wilson Park as a staging site and move the staging site further from such a valuable outdoor community resource.

Additionally, construction will disrupt residents' ability to safely navigate the neighborhood, especially because many people walk to important community institutions such as churches and schools. It is likely that children will be unable to safely walk to and from STEAM at Dr. King Elementary School, located just yards from the project's footprint. The noise, pollution, and vehicular traffic from construction will also disrupt these important community centers themselves. Bible study and church services will be disturbed at Tucker Memorial Baptist Church if it is not forced to relocate, as will class and recess at Dr. King Elementary School if it continues to operate immediately next to an active construction site. NYSDOT has not created an adequate plan to mitigate the harms it will inflict on the fabric of the community in the Southside.

Other important community resources—such as Toomey Abbott Towers, which serves the elderly and disabled—will be severely impacted by construction. Elderly and disabled residents will face greater difficulty leaving their homes due to construction, so they will be

[36] *See* U.S. ENV'T PROTECTION AGENCY, *supra* note 18 at 2 (noting that higher activity levels contribute to higher rates of exposure to air pollution in the context of comparing children's risk of health problems to adults').

continuously exposed to it. NYSDOT has not explained how ambulances and public buses will access Toomey Abbott Towers in light of the fact that the building's ADA-accessible entrance will be closed off due to the construction. NYSDOT must meet with Southside residents to discuss meaningful ways to mitigate these and other harms on their quality of life and incorporate their recommendations into its final plan.

To ensure that NYSDOT, the city, and contractors comply with the above demands and requirements of the DEIS, NYSDOT should hire a third party to monitor the environmental impacts of the I-81 redevelopment with community oversight. Given the racial discrimination embedded in Syracuse and I-81 itself, the impacted community deserves an impartial group with environmental and construction expertise that will regularly assess and report on the environmental impact of the construction and the CGA. Issues such as exposure to lead and other byproducts of construction are of great concern to the impacted community. These reports should be made available at regular public meetings and for any concerned citizen upon request. In addition, it is important that impacted residents are able to participate in a structured and meaningful way for the duration of the construction and beyond. As an example, the Metropolitan Council in Minnesota has implemented a METRO Blue Line Extension Community Advisory Council ("CAC"), a group of local citizens and stakeholders, to serve as a voice for community advice to the Corridor Management Committee during the planning and implementation phases of the light rail line.[37] NYSDOT should implement a similar structure to ensure that the environmental justice communities are provided an opportunity to participate and have a voice throughout the project and beyond.

Placement of the Roundabout: The roundabout must be moved to a location where its environmental impact will not disproportionately harm vulnerable populations

We are pleased that after receiving significant feedback from the community, NYSDOT is considering alternative locations for the roundabout. As previously proposed by NYSDOT, the roundabout would be situated less than six hundred feet from STEAM at Dr. King. This placement of the roundabout would be dangerous for students given the amount of time they spend at school and their susceptibility to respiratory health problems.[38] The closer to the road, the higher concentration of traffic-related air pollution.[39]

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[37] METRO. COUNCIL, METRO BLUE LINE EXTENSION COMMUNITY ADVISORY COMMITTEE, https://metrocouncil.org/Transportation/Projects/Light-Rail-Projects/METRO-Blue-Line-Extension/Committees/Community-Advisory-Committee-(CAC)/Members.aspx.
[38] U.S. ENV'T PROTECTION AGENCY, *supra* note 18 at 2.
[39] *Id*.

As proposed, NYSDOT predicts that 38,000 cars will use the roundabout per day,[40] making the roundabout and its connecting roads a serious source of directly emitted pollutants and road dust.[41] Research has proven that there are significant negative impacts on students who attend schools within 500-600 feet of major roadways.[42] Proximity to pollutants from highway vehicles has contributed to the Syracuse School District having among the highest asthma hospitalization rates in New York.[43] Furthermore, poor air quality is causally linked with worse health effects and lower academic performance.[44] Students who have asthma are more likely to miss school, and one of the key ways to effectively manage a student's asthma is by minimizing their exposure to environmental triggers at school.[45] While NYSDOT has announced alternative locations that are being considered, these same environmental concerns expressed above must be addressed when analyzing the environmental impacts of each location.

NYSDOT must create a specific plan to protect any individuals who will be exposed to the concentration of traffic-related air pollution due to the roundabout's placement. This plan must ensure any construction and staging, including the proposed roundabout, is at least 1,200 feet away from any school, homes, and other frequently occupied buildings.[46] Further, NYSDOT must consider noise and pollution mitigation options like vegetation and noise barriers.[47]

Conclusion

Building the CGA affords Syracuse the opportunity to rebuild itself in a way that better reflects the values of justice, equity, and access that our nation strives for. Two core components of President Biden's mandate to "Build Back Better" are equitable infrastructure and quality jobs for Americans. Syracuse must seize this opportunity to meet these priorities and address the history of racial discrimination embedded in the very structure of the city. Removing the I-81 viaduct is necessary but insufficient. However, with the proper commitments to the impacted community, NYSDOT and Syracuse can engage in a

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[40] U.S. DEP'T OF TRANSPORTATION, FED. HIGHWAY ADMIN. & N.Y. STATE DEP'T OF TRANSPORTATION, *supra* note 33.

[41] U.S. ENV'T PROTECTION AGENCY, *supra* note 18 at 2.

[42] *Id.*

[43] N.Y. STATE HEALTH DEP'T, N.Y. STATE HEALTH EQUITY REP. 108 (Apr. 2019), https://www.health.ny.gov/community/minority/docs/health_equity_report_2019.pdf.

[44] Wendy Q. Xiao, *supra* note 8 at 923-27.

[45] U.S. ENV'T PROTECTION AGENCY, MANAGING ASTHMA IN THE SCHOOL ENVIRONMENT 2 (Aug. 2010), https://www.epa.gov/sites/default/files/2013-08/documents/managing_asthma.pdf.

[46] Motor vehicle pollutant concentration tend to be higher closer to the road, with the highest level within the first 500 feet of a roadway and reaching background levels within approximately 2,000 feet. U.S. ENV'T PROTECTION AGENCY, *supra* note 18 at 2.

[47] U.S. ENV'T PROTECTION AGENCY, LIVING CLOSE TO ROADWAYS: HEALTH CONCERNS AND MITIGATION STRATEGIES (Jan. 2017), https://www.epa.gov/sciencematters/living-close-roadways-health-concerns-and-mitigation-strategies.

restorative process that cities facing similar difficult redevelopment decisions can look to for guidance. By instituting these suggestions and elevating the input of the impacted community, this process will provide valuable training and jobs to the neighborhoods with some of the most concentrated poverty in the county. It will build better roads and transportation networks without forsaking the welfare of neighboring communities. It will protect and value the communities NYSDOT and Syracuse have legal obligations to protect. Most importantly, it will serve as a model for how infrastructure redevelopment projects can be used as a way to reckon with historical racial discrimination and remedy its most significant ills.

Sincerely,

Nina Nevarez

Nina Nevarez
Abdiel Caballero
Nathan Lee
Justin McCarroll
Law Student Advocates

Deborah N. Archer
Professor of Clinical Law
Faculty Director, Center on Race, Inequality, and the Law
NYU School of Law

Johanna Miller
Adjunct Professor of Clinical Law

RECEIVED
OCT 13 2021
BY:

405 Woodbine Ave.
Syracuse NY 13206

October 11, 2021

Mr. Mark Frechette, P.E. - Project Director
NYSDOT - Region 3
333 East Washington St.
Syracuse NY 13202

Dear Mr. Frechette:

I would like to provide my comments on the I-81 project. I have lived in the Syracuse area all my life and have lived in the Eastwood section of the City of Syracuse for the past 37 years. I used to work in downtown Syracuse.

It is because of all the time I spend on City streets that I urge the DOT to repair the existing I-81 viaduct. Do not tear it down. Do not widen it (instead, secure a variance from current DOT required widths). Fix it and leave it where it is.

The priority of the DOT and the City and the State ought to be the safe and efficient travel of all who use Interstate 81, not the remediation of some social injustice done when this section of I-81 was erected 60 years ago. That ship has sailed. People, companies, businesses, hospital workers and patients depend on I-81 running through the City. Residents of the City hop on I-81 to travel from Point A to Point B within the City limits because it is quicker, unlike the City streets, there aren't as many potholes, it is usually plowed in the winter and doesn't often flood during rainstorms, and there aren't any people walking in the road. The City does not - and apparently cannot - maintain its streets. Traffic added by the proposed Community Grid option would only worsen road conditions. Traffic signals have never been synchronized properly, despite repeated alleged efforts to do so. Winding I-81 local traffic through City streets would be a nightmare. Please don't do it. If you want to help the folks who were impacted 60 years ago and those who still live in the shadow of the viaduct, MOVE THE PEOPLE, NOT THE HIGHWAY.

Sincerely,
Karen A. O'Connell

David H. Knapp
Chairman of the Legislature

Post Office Box #546
Syracuse, New York 13201

Onondaga County Legislature
REPUBLICAN CAUCUS

Brian F. May
Majority Leader

OnondagaRLCC.com
onondagarlcc@gmail.com

To Whom it May Concern:

Over the last eight years, the Republican Caucus of the Onondaga County Legislature has consistently voiced a desire for a broad, comprehensive replacement solution for I-81 that takes into consideration our community's needs from the vital standpoints of commerce, transportation, public safety, quality of life and connectedness between City and suburban residents.

The original construction of I-81 over half a century ago left scars on Syracuse neighborhoods because of an unfair and inconsiderate process. Since its construction, neighborhoods, towns, villages and businesses have grown around the footprint of the highway and rely on its traffic. When it was first built, it was done incorrectly, but two wrongs don't make a right. The communities and economies that have been built around I-81 should not be punished for the mistakes of the past.

Several innovative ideas have been advanced to remedy this problem with fairness. We strongly support fixing prior mistakes pertaining to this highway, but feel the proposed solution seriously lacks consideration of all our community's needs.

Onondaga County residents would be sold short if a solution for I-81 is chosen that does not address the needs of our community—urban and suburban. As the relatives of Harriet Tubman recently said, "Now is the time to do this correctly."

Sincerely,

The Onondaga County Legislature Republican Caucus

David Knapp, Chairman – 12th District

Brian May, Majority Leader – 1st District

Jim Rowley – 2nd District

Tim Burtis – 3rd District

Judy Tassone – 4th District

Deb Cody – 5th District

Julie Abbott-Kenan – 6th District

Kevin Holmquist – 10th District

John McBride – 11th District

Ken Bush, Jr – 13th District

Cody Kelly – 14th District

Damian M. Ulatowski
Supervisor

Joseph A. Bick
Deputy Supervisor

Office of the Supervisor
Town of Clay

"One of America's 100 Best Places to Live"

Councilors:
Brian E. Hall
David J. Hess
Kevin J. Meaker
Ryan A. Pleskach
Eugene B. Young

July 29, 2021

RECEIVED
AUG - 2 2021
BY:

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Re: Draft Environmental Impact Statement - Need For Additional Time For Review and Comment

Dear Mark and Rick:

As elected representatives from Onondaga County's Towns, we are deeply concerned with the aggressive schedule that is dictating the review of the "DEIS" on the I-81 project and its impact on Central New Yorkers.

The purpose of this communication is to formally request that the public comment period be extended through the end of the year to allow sufficient time for a complete review of the 28,000+ page document. Given COVID, summer schedules, and most importantly the amount of data just made available, it is not feasible to have complete responses available by September 14th.

The future of Interstate 81 is an important decision that will impact our residents, neighborhoods and businesses for decades. It is critical that everyone be provided sufficient time to have their comments submitted and considered.

Thanks in advance for your consideration.

Sincerely,

Supervisors of Onondaga County

4401 State Route 31, Clay, New York 13041-8707
Phone: (315) 652-3800 ❖ Website: www.townofclay.org ❖ E-Mail: supervisor@townofclay.org ❖ Fax: (315) 622-7259

RECEIVED
AUG 23 2021
BY:

August 19, 2021

To: Mark Frechette, PE, Project Director

NY State Dept. of Transportation Region 3

333 East Washington St.

Syracuse, NY 13202

Dear Mr. Frechette:

Please keep I81 South and North going through the the Town of Salina including the Galeville area, the North and parts of the south Sides of Syracuse, Liverpool and North Syracuse. It is important that these communities have quick and easy access to St. Joseph's, Crouse Memorial and Upstate Hospitals.

It is also necessary for our economy to have this highway as a major route to Destiny USA and the hotels in the above mentioned areas.

Your consideration to this matter will be greatly appreciated.

Yours truly,

J & P Peluso

Joseph and Pauline Peluso

715 Hanover Ave.

Liverpool, NY 13088

From: Frechette, Mark (DOT)
To: Bjorness, Joan E (DOT)
Subject: FW: comment
Date: Monday, July 19, 2021 9:29:22 AM

From: jean public <jeanpublic1@gmail.com>
Sent: Friday, July 16, 2021 11:06 AM
To: Frechette, Mark (DOT) <Mark.Frechette@dot.ny.gov>; rick.marquis@dot.ny.gov; PETA Info <info@peta.org>; madraven@gmail.com; westchesterhumane@gmail.com; info@nyclass.org
Cc: SCOOPS@huffpost.com; CONTACT@thedodo.com; LETTERS@nytimes.com
Subject: Fwd: comment

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public comment on federal register

we shoudlnot be building any more highway projects that do not take intoconsideration for overpasses and underpasses so that wildlife can get across the roads.\it is far too long that we have een leaving them out. these wildlife species need to be able to live when they cross highways.this is good for both people and animals. we need our road people to take that into consideration.

TO THIS POINT IN TIME, OUR ROAD EXPERTS HAVE JUST LEFT OUR WILDIFE AND THEIR NEED TO CROSS ROADS. HOW CANYOU BE SO STUPID?

THIS COMMETN IS FOR THE PUBLIC RECORD. PLEASE RECEIPT. JEAN PUBLIEE JEAN PUBLIC1@GMAIL.COM

[Federal Register Volume 86, Number 134 (Friday, July 16, 2021)]
[Notices]
[Page 37751]
From the Federal Register Online via the Government Publishing Office
[www.gpo.gov]
[FR Doc No: 2021-15134]

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ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-9057-4]

Environmental Impact Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General

Information 202-564-5632 or https://www.epa.gov/nepa.

Weekly receipt of Environmental Impact Statements (EIS)
Filed July 2, 2021 10 a.m. EST Through July 12, 2021 10 a.m. EST
Pursuant to 40 CFR 1506.9.

Notice

Section 309(a) of the Clean Air Act requires that EPA make public its comments on EISs issued by other Federal agencies. EPA's comment letters on EISs are available at: https://cdxnodengn.epa.gov/cdx-enepa-public/action/eis/search.

EIS No. 20210095, Draft, FHWA, NY, Interstate 81 Viaduct Project, Comment Period Ends: 09/14/2021, Contact: Richard J. Marquis 518-431-4127.
EIS No. 20210096, Final, AZDOT, FHWA, AZ, Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for Interstate 11 Corridor between Nogales and Wickenburg, Arizona, Review Period Ends: 08/16/2021, Contact: Alan Hansen 602-382-8964.
EIS No. 20210097, Draft, FERC, AZ, North Baja Xpress Project, Comment Period Ends: 08/30/2021, Contact: Office of External Affairs 866-208-3372.
EIS No. 20210098, Draft, VA, PRO, Draft Programmatic Environmental Impact Statement for Veterans Affairs Housing Loan Program, Comment Period Ends: 08/30/2021, Contact: Elysium Drumm 202-632-8862.

Dated: July 12, 2021.
Cindy S. Barger,
Director, NEPA Compliance Division, Office of Federal Activities.
[FR Doc. 2021-15134 Filed 7-15-21; 8:45 am]
BILLING CODE 6560-50-P

Pyramid Management Group, LLC/Destiny USA DEIS Comment Letter

Atzrott Hamburg, Hilary <HGAtzrott@Venable.com>

Thu 10/14/2021 2:37 PM

To: dot.sm.mo.I81Opportunities <dot.sm.mo.I81Opportunities@dot.ny.gov>
Cc: Wagner, Fred R. <FRWagner@Venable.com>

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

SENT ON BEHALF OF FRED WAGNER

Mr. Frechette and Mr. Marquis,

We respectfully submit the documents attached to this e-mail (and alternatively available for download at this link) on behalf of Pyramid Management Group, LLC and Destiny USA (collectively "Pyramid"). Courtesy hard copies are being sent via USPS to your offices as well.

Do not hesitate to contact Pyramid or this office with any questions.

Best,
Fred Wagner

Fred R. Wagner, Esq. | Venable LLP
t 202.344.4032 | **f** 202.344.8300 | **m** 240.401.6094
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***

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PYRAMID MANAGEMENT GROUP, LLC

THE CLINTON EXCHANGE ▲ 4 CLINTON SQUARE
SYRACUSE, NEW YORK 13202-1078

TEL 315-422-7000
FAX 315-634-7607

October 14, 2021

Mark Frechette, P.E., Project Director
NYS Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis, Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

RE: Draft Environmental Impact Statement Comment Letter

Dear Mr. Marquis and Mr. Frechette:

Pyramid Management Group, LLC and Destiny USA (Collectively "Pyramid") are submitting this communication and both attachments in response to the request for public comment on the Draft Environmental Impact Statement ("DEIS"). Our team, supported by traffic engineers, economic analysts, legal experts and other professionals analyzed the publically available documents over the past three months and have assembled our submission.

Please find the following:

- Letter and supporting material from Venable LLP dated October 14, 2021 outlining the issues and challenges with the process, data utilized and recommended alternative the New York State Department of Transportation ("NYSDOT") has advanced to date.

- Letter from Destiny USA's General Manager Robert Schoeneck dated October 14, 2021; specifically reviewing and commenting on the economic impact section of the DEIS; which did not include an accurate representation of Destiny USA's visitation and reliance on Interstate 81.

Our entire team is available to work collaboratively with both the New York State Department of Transportation, the Federal Highway Administration and other stakeholders to analyze, plan and develop a project that maintains traffic access, reconnects our communities, strengthens our economy and invests in our neighborhoods.

Sincerely,
PYRAMID MANAGEMENT GROUP, LLC

Stephen J. Congel
Chief Executive Officer

VENABLE LLP

600 MASSACHUSETTS AVE., NW WASHINGTON, DC 20001
T 202.344.4000 F 202.344.8300 www.Venable.com

October 14, 2021

Fred R. Wagner
T 202.344.4032
F 202.344.8300
FRWagner@Venable.com

VIA ELECTRONIC DELIVERY to i81opportunities@dot.ny.gov and USPS CERTIFIED MAIL

Mark Frechette, P.E.
Project Director
New York State Department of Transportation,
Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Mr. Frechette and Mr. Marquis,

Destiny USA ("Destiny") has been involved in the proposal to address the aging I-81 Viaduct for almost a decade. The proposed action is of the utmost importance to Destiny (and to all of Central New York) in that it represents the first time the federal government would support the decommissioning of an essential, two-digit portion of the Eisenhower Interstate System without simultaneously providing adequate highway capacity to handle existing and future traffic and interstate commerce. Destiny has attempted in good faith to coordinate with the New York State Department of Transportation ("NYSDOT") and has actively reviewed and commented on various analyses offered by the agency. As the following comments demonstrate, however, those efforts have been in vain. NYSDOT's Draft Environmental Impact Statement ("DEIS") attempts to support the agency's preferred alternative – to remove the I-81 Viaduct in favor of a "Community Grid." The DEIS ignores many of the key concerns Destiny and many others have raised consistently, and as a result, has failed to meet even the most basic requirements of the National Environmental Policy Act ("NEPA"). **NYSDOT should commit to the preparation of a supplemental DEIS under NEPA's regulations that will take a hard look at all reasonable alternatives, and fairly responds to the concerns of the entire Syracuse area community.**

INTRODUCTION and SUMMARY OF COMMENTS

Publication of the NYSDOT DEIS for the Interstate 81 project marks the next step of a flawed environmental review process aimed only at supporting NYSDOT's predetermined desired outcome which they have been advancing for more than a decade. Contrary to the mandates of NEPA, NYSDOT has failed to: (1) consider a reasonable range of alternatives, (2) accurately analyze whether the preferred alternative would meet the project's objectives including improving mobility and traffic management, reducing vehicle miles traveled and greenhouse gas emissions, and reconnecting communities, (3) fairly assess how its preferred alternative would adversely impact the very communities it is purportedly aimed to benefit, (4) even recognize, let along review accurately, how its preferred alternative would impact Syracuse's industries and economy, (5) truly listen to and recognize the concerns of many local citizens who worry that the preferred alternative will simply repeat mistakes of the past, allegedly in the name of fairness and

equity, and (6) honestly evaluate the degradation of the environment in terms of increased fossil fuel consumption and increased tailpipe emissions that would result from the preferred alternative.

Procedurally and substantively, the DEIS represents a classic case of "arbitrary, capricious, and an abuse of discretion" agency action. For the better part of a decade, NYSDOT has single-mindedly pursued the so-called "Community Boulevard and Grid" alternative, which would tear down almost a mile and a half of the existing I-81 Viaduct through downtown Syracuse. That alternative, however, would be better labeled the "481 Bypass Alternative" because the only way traffic could be managed following the demolition of a key portion of the Eisenhower Interstate system would be to invest nearly $1 billion in upgrading and expanding a high-speed bypass to direct cars and trucks around the city, even though NYSDOT's own data demonstrate that 94% of the traffic is local.

The 481 Bypass/Community Grid alternative would build massive interchanges to the north and south of the city, expand lanes, and make other engineering improvements to the existing I-481, all in the hope that area residents, travelers, and truckers will willingly go 15 miles out of their way to avoid a traffic-clogged "grid" through downtown Syracuse. This will not happen. Worst of all, instead of an elevated highway, NYSDOT would bestow on the community an "at-grade arterial," which is in reality a street-level highway through the heart of Syracuse's Southside neighborhoods and downtown Syracuse, mistakenly claiming such an option would be "pedestrian and bicycle friendly."

The Federal Highway Administration ("FHWA"), as the lead federal agency with ultimate responsibility for approving any NEPA analysis by a state department of transportation and issuing a final decision selecting an alternative for the proposed action, should reject this flawed process. ***FHWA should demand that NYSDOT prepare a supplemental NEPA review that takes a fair look at all reasonable alternatives, actually responds to the concerns of the entire Syracuse area community, and corrects the fundamental flaws present in the current DEIS***. NYSDOT's DEIS violates NEPA's most basic premise – an agency should analyze a "reasonable range" of alternatives and keep an open mind as to solutions to the transportation and related issues posed by the proposed action. They have instead prematurely identified a preferred alternative that is contrary to Biden administration transportation and environmental policies, promotes suburban sprawl, and exacerbates traffic and air pollution in the very communities the action is supposed to benefit.

As detailed below, in order to meet its unreasonably predetermined outcome, NYSDOT has performed a series of technical analyses modeling traffic and economic impacts that have either willfully manipulated or negligently ignored basic facts and common sense. NYSDOT is relying on outdated 2013 data that they started analyzing over five years ago. NYSDOT makes unsupported assumptions about lack of future traffic growth, about how long-established businesses along I-81 would function absent direct highway access, about how truck traffic along the crucial I-81 corridor is conducted, about how a newly built, 3.8 million square feet Amazon distribution facility employing 1,500 people and opening Winter 2022 would alter the already flawed traffic analysis, about how local intersections beyond the extremely narrow DEIS study area will be impacted by removing and not replacing the I-81 Viaduct, and about how the preferred alternative would "connect" existing communities. NYSDOT has also failed to examine the adverse economic impacts that the Community Grid would cause. These errors demonstrate that NYSDOT has failed to take the "hard look" at all environmental and socio-economic impacts, as mandated by NEPA and its implementing regulations.

Stakeholders from Syracuse have proposed reasonable options to NYSDOT which would both preserve the crucial safe route along I-81 and promote the "community connectivity" supposedly at the heart of NYSDOT's preferred alternative.

As an example, a combination of the Grid with the proposed Harriet Tubman Memorial Freedom Bridge would take none of the nearly billion dollars needed to build the 481 Bypass/Community Grid alternative and actually devote those funds in the city to facilitate a truly connected community. Under the Grid and Harriet Tubman Memorial Freedom Bridge, residents and visitors would have viable and safe east-west access, connecting existing academic and health centers with the downtown area, rather than a congested four-lane street-level highway with 13 signalized intersections proposed under the 481 Bypass/Community Grid. Rather than imposing a "roundabout" with heavy traffic immediately adjacent to an elementary school or in the midst of a southside neighborhood, the Grid and Harriet Tubman Memorial Freedom Bridge would provide enhanced community mobility and safety. Rather than building an over-engineered viaduct as described in the DEIS, the community could achieve a landmark piece of infrastructure that would replace the existing I-81 elevated highway with a bridge that could unite Syracuse and surrounding areas. And, rather than devoting funds to a highway bypass that would increase suburban sprawl, negative air impacts, wasted fuel, and frustrate global warming initiatives, the state could direct needed funds to assist the communities that had been displaced by the construction of the I-81 Viaduct over 50 years ago. Yet, to date, NYSDOT has shown no interest in a fair and open discussion of such a promising alternative.

Over 50 years ago, in the name of progress and mobility, federal and state leaders made an error. A community was separated and minority citizens were displaced from their homes and businesses. In the name of correcting misdeeds of the past, NYSDOT should not make another serious mistake. Simply tearing down a symbol of those past decisions, a functioning highway, will not solve 21st century problems. We urge FHWA to listen to the citizens of Syracuse and Onondaga County who have learned from the past and believe there is a better way to a more equitable and unified future for the region.

ABOUT DESTINY USA

Destiny USA is the eighth largest enclosed shopping complex in the United States and the largest shopping, dining, and entertainment venue in New York State. Pre-COVID, Destiny welcomed more than 26 million visitors annually who travel from local towns, surrounding cities, adjoining states, and even internationally to visit a facility that contains 260 retail venues, 18 full-service restaurants, 18 entertainment venues, as well as the famous 110-year-old antique carousel.

Destiny's management entity, Pyramid Management Group ("Pyramid"), has long been committed to the Syracuse community and economy and has been reviewing NYSDOT materials related to the various I-81 proposals for nearly a decade. In 1988, Pyramid undertook the revitalization of an unsightly scrap yard and contaminated oil tank farm located at the crossroads of I-690 and I-81. Seeing the potential for economic growth and revitalization in Syracuse at the crossroads of two key transportation networks, Pyramid remediated and developed the site into a major destination. The facility, then known as the Carousel Center, opened its doors to customers in 1990 and over time became the largest attraction in the Syracuse region, with attendance exceeding 10 million guests.

Economic consultants soon realized the benefit Carousel Center was having in the Syracuse region. In planning reports, expansion of the Carousel Center was described as, "…far and away the greatest economic potential for the region," and economic development reports stressed, "Significant efforts to

ensure this type of development should be made."[1] This same report stressed that completion of a Syracuse Lakefront project that provided easy access between the waterfront, Carousel Center, and Downtown Syracuse would provide a sense of unity in the community. In 1999, after years of successful operation, Pyramid made an even greater investment in Syracuse and announced plans to make the property into an international attraction with an expanded footprint – the facility now known as Destiny USA, which opened in 2012. The project was supported by the Syracuse Common Council and Onondaga County Legislature and facilitated by the Syracuse Industrial Development Agency and was largely designed to support the 77.5% of leisure travelers who arrived to the area each year by car.[2] This development was supported in part by PILOT bonds. Under the Master PILOT Agreement, the City and Syracuse Industrial Development Agency were (and are) to take such actions that Pyramid, "…may reasonably require to enhance the ability of Carousel Center, Expansion Owner, or other such Obligor to design, finance, construct, equip, maintain and operate the Project Facility as a *major regional tourist attraction*." [emphasis added][3]

Throughout the project's history – first as Carousel Center, now as Destiny USA – Pyramid has been dedicated to the needs of the community. Destiny's various businesses facilitate the employment of approximately 5,500 local residents. It serves as a hub for not-for-profit fundraising, offering free space to dozens of not-for-profits each year. It includes the NYS Central New York Welcome Center sponsored and facilitated by I Love NY, which sells locally-made products from New York State Farmers and Producers. Perhaps most crucially, Destiny is a major source of sales tax revenue, and other government revenues for Syracuse, Onondaga County, and New York State's government.

The Destiny complex hosts a wide variety of shopping, dining, and entertainment venues. It also includes a 209 key Embassy Suites hotel, and 75 acres of adjoining land slated for additional redevelopment to reclaim Syracuse's waterfront. Destiny's location was selected, and major investments of more than $1.5 billion made, largely due to the location at the crossroads of I-81 and I-90 and is largely dependent on vehicular traffic with 136 million people living within a 750 mile radius of Syracuse, including over 50% of the population of Canada and the United States.[4] Further, while many of its customers come from a wide trade area in order to utilize the various shopping, dining and entertainment services, many local shoppers also frequent Destiny. As explained below, the DEIS severely understates the dramatic impact a change in vehicular traffic patterns could have on Destiny and, in turn, on Syracuse's local economy. Destiny remains gravely concerned about what implementation of NYSDOT's preferred alternative could mean not only for the shopping center itself, but also for Destiny's employees and the Central New York economy.

A group of local residents and businesses have actively monitored NYSDOT's environmental review process and first obtained a copy of a draft DEIS in 2016 by FOIL request. Based on coordination with a variety of consultants with background in the key areas of traffic and economic impact analyses, Pyramid believes that there are countless flaws in NYSDOT's DEIS that have existed since 2016 and which have continuously been brought to NYSDOT's attention but largely ignored. In order to reach a fair and rational decision on how best to manage the crucial I-81 corridor through Central New York, NYSDOT and FHWA must review these full range of issues identified herein, and consider revised options that better serve the regional community's transportation needs.

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[1] *See* 1999 Cumings McNulty Tourism Assessment, *Development Strategy for Syracuse* dated November 1999 (the "Tourism Assessment" attached hereto as **Exhibit A.**

[2] *See* Tourism Assessment

[3] *See* May 9, 2019 letter from Stephen J. Congel to Mayor Ben Walsh, attached hereto as **Exhibit B.**

[4] *See* Centerstate Corporation for Economic Opportunity December 2020 Fact Sheet for Syracuse (the "Centerstate Fact Sheet") attached hereto as **Exhibit C**.

DISCUSSION

I. NYSDOT Has Failed to Consider a Reasonable Range of Alternatives

NEPA requires an agency to analyze a "reasonable range" of alternatives and keep an open mind as to solutions. Indeed, the Council on Environmental Quality ("CEQ") calls the alternatives analysis the "heart of the EIS." *See* 40 C.F.R. 1502.14; *National Resources Defense Council, Inc. v. Morton*, 458 F.2d 827 (DC Cir. 1972). This regulatory mandate means that an agency must "***rigorously explore and objectively evaluate***" all reasonable alternatives. 1502.14(a) (emphasis added). However, based on the current record, it is readily apparent that NYSDOT has done neither, and to the contrary has approached this DEIS with a preferred option pre-selected and has been touting this preferred option long before the DEIS was released. In fact, in May 2019, NYSDOT released a Preliminary Draft Environmental Impact Statement ("pDEIS") – an unprecedented action taken without review by or the approval of FHWA as the lead federal agency – that prematurely identified the 481 Bypass/Community Grid as the preferred alternative. NYSDOT published this document on line (it could not be officially published in the Federal Register or be subject to formal public participation absent FHWA approval) and then conducted a propaganda tour ostensibly designed to get public input but in reality focused on drumming up support for its preferred alternative outside the boundaries of the regular NEPA process.

NYSDOT has demonstrated its bias in favor of the 481 Bypass/Community Grid from day one. However, the 481 Bypass/Community Grid does not meet many of NYSDOT's stated goals in the DEIS. The 481 Bypass/Community Grid fails to: (i) address the transportation network structural deficiencies, particularly associated with aging bridge structures and non-standard/non-conforming design features with the project limits along I-81 and I-690 and (ii) maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., business districts, hospitals, and institutions) within neighborhoods. Rather, NYSDOT's preferred action prioritizes non-vehicular mobility, ostensibly to the benefit of pedestrians and bicyclists, by building a four-lane at -grade highway through an urban community.

Other build alternatives have not received rigorous, fair, and objective consideration based on NYSDOT's predetermined outcome. Options such as a covered highway or a variety of hybrid tunnel/street grid solutions, were rejected before giving them a full review in the DEIS on the purely unsupported conclusion that these alternatives were too expensive. For example, NYSDOT only preliminarily considered but then quickly rejected a viaduct long-term rehabilitation program, a stacked viaduct, several tunnel alternatives with grids on top, depressed highway (i.e. open trench) alternatives, and a western bypass alternative.[5]

Each of the aforementioned alternatives were rejected on an arbitrary basis. A "reasonable" cost was established as "less than 2.5 times the estimated cost of Alternative V-1 (Rehabilitation)," which was estimated in 2018 as $940 million.[6] No rationale was provided for this number or the selection of the 2.5 times multiplier. Certain tunnel alternatives were rejected because the number of properties that would have to be acquired was deemed unreasonable.[7] However, number of buildings is an arbitrary measure. Acquisition of 50 small buildings has the potential for the same land use impacts as 10 larger buildings. Other options were rejected due to "community disruptions" including, "…impacts to vehicular, pedestrian,

[5] *See* DEIS Chapter 3, Section 3.3. Other communities around the country, such as Denver, CO for I-70, Wilmington, DE for I-95, and Miami, FL for I-395 are considering very similar options which have not been rejected out of hand.
[6] *See* DEIS Chapter 3, Section 3.3.1
[7] *See* Id.

and bicycle traffic."[8] Yet NYSDOT has ultimately advanced as its preferred alternative one that would have these same and/or greater detrimental impacts by bringing thousands of cars and trucks to the street level.

Most recently, NYSDOT has publicly discounted and prematurely dismissed without analysis the Grid and Harriet Tubman Memorial Freedom Bridge advocated by a wide variety of community stakeholders. Community residents, elected officials and business representatives have recommended this plan specifically to meet NYSDOT's stated project Purpose and Need. This option is viable and deserves a full analysis and airing through the NEPA process. Specifically, the Grid and Harriet Tubman Memorial Freedom Bridge (i) would not be larger than the existing viaduct, it would actually be narrower; (ii) could be designed with a 45 mph speed limit, unlike the 60 mph limit utilized to analyze this alternative in the DEIS; and (iii) would be affordable; this proposal would not require almost $1 billion to widen I-481 in the suburbs and improved I-690; those funds currently slated to reinforce I-481 through the Syracuse suburbs could be used for the Grid and Harriet Tubman Memorial Freedom Bridge and for the benefit of community concerns associated with increasing mobility in and around downtown.

It is estimated the aforementioned plan would prevent at least 36,900 cars on a daily basis from flooding neighborhood streets.[9] Additionally, a dangerous proposed roundabout adjacent to Dr. King Elementary School or at a nearby intersection would be eliminated, and traffic heading to the medical and educational institutions in University Hill, downtown, or other assets to the north would continue to exit onto streets already designated as urban arterials.

The 481 Bypass/Community Grid plan largely results in increased travel times and slower speeds. By selecting this preferred alternative, NYSDOT has made clear that this is not a congestion relief project. Nor is this a volume accommodation project, based on the outdated and unreasonably low projected growth numbers NYSDOT uses in its analysis. Rather, the obvious and clearest project need centers on a basic engineering purpose – how to address a major Interstate facility that the NYSDOT describes as nearing the end of its "useful life," a structural, but not functional description. With that general purpose at the heart of this project, it is indefensible for NYSDOT to attempt to promote without sufficient consideration an alternative that would increase travel time and slow traffic throughout the region and community, and as detailed below, fail to address the "connectivity" objectives for enhanced pedestrian and bicycle access.

II. NYSDOT's Quantitative Traffic Analysis Is Fundamentally Flawed

Even though NYSDOT's own analysis has demonstrated that the 481 Bypass/Community Grid will increase travel times, vehicle miles traveled ("VMT"), and slow speeds in many areas, the agency continues to advance this as its preferred alternative. A cursory review of NYSDOT's data – including quantitative comparisons between NYSDOT's 2016 preliminary Draft Environmental Impact Statement, 2019 pDEIS and 2021 DEIS and qualitative assumptions – reveal extremely concerning inaccuracies. As detailed below, in some instances data is simply incorrect, and in others, assumptions cherry-picked to fit NYSDOT's predetermined narrative. NYSDOT's approach fails to take the requisite "hard look" at the mobility aspects of the proposed action by utilizing data and traffic modeling in such a disingenuous way.

[8] *See* DEIS Chapter 3, Section 3.3.2
[9] *Taking Down I-81 Viaduct Will 'Hurt The Neighborhood It Is Supposed To Help*', Syracuse.com, September 7, 2021

A. The DEIS Traffic Growth Assumptions Fail to Withstand Scrutiny

NYSDOT's DEIS is fundamentally flawed because of its unreasonable and blatantly inaccurate summaries of projected traffic growth projections. This basic error results in projections that cannot, by definition, accurately assess how the alternatives retained for detailed study in the DEIS will perform in the short or longer terms. Pages 5-18 through 5-19 of the DEIS reveal the agency's incorrect growth assumptions. It states: "All counts collected prior to 2013 were factored using an annual growth rate of 0.3 percent (estimated from the SMTC Regional Travel Demand Model) to represent a common base year of 2013."[10] NYSDOT defends this assumption by stating: "the 2013 base year has been retained since the study area has not experienced significant travel pattern changes in recent years. For example, annual data such as 'Syracuse Urban Area – VMT since 1985' developed by NYSDOT shows a very stable vehicle miles traveled trend since 2013 for the functional classes of freeways, arterials, and collectors in the Syracuse urban area."[11]

The agency's assumptions, however, ignore the substantial traffic growth that was occurring prior to its 2013 "base year" in the very segment of I-81 that it is proposing to tear down. Based on available DOT data and our client's analysis, a 0.3 percent annual growth rate does not accurately represent either actual traffic growth rates in the two decades prior to 2013, or changes that have occurred more recently. Traffic information made available online (it is not clear whether this data appear in the voluminous DEIS appendices) compiles traffic counts on various segments of New York State roadways and U.S. interstate highways. For purposes of these comments, we have located "Average Annual Daily Traffic" (or "AADT") from 1995, 1998, 2001, and 2014[12] for the I-81 Viaduct segment. These data show that during the 19-year period between 1994 and 2014, traffic on this segment of I-81 grew over 51 percent, at an average of 2.71 percent annually. *See* Table 1, attached hereto as **Exhibit D**.

This already gathered and verifiable information runs directly contrary to statistics published in the DEIS. NYSDOT projects traffic at key locations in the study area through the year 2056 (43 years after its "base year") and states that there will be virtually a zero-growth rate per year – actually just 0.23 percent per year. *See* DEIS, Table 5-7, attached hereto as **Exhibit E.** Applying simple mathematics to the NYSDOT data, the DEIS projects an increase in the PM Peak Hour traffic on the existing Viaduct in the "no-build" scenario over the next 30+ years of just 646 <u>total</u> vehicles, or just 6.8 percent over that time period. NYSDOT fails to explain why or how future growth would be just 1/12th of the actually experienced growth in recent years. Again, performing simple math on the basis of NYSDOT's own figures, if the agency used the 2.7 percent per year figure instead of its artificially suppressed number, I-81 traffic on the Viaduct would grow during that period to approximately 11,600 vehicles in the PM Peak Hour by 2056, for a total of 122.9 percent compared to 6.8 percent. *See* Tables 1, 2 and 3, attached hereto as **Exhibit F**.

NYSDOT also fails to take current and relevant information into consideration that would clearly impact growth projections. For example, there have been plans announced for an $85 million Syracuse Aquarium at the Syracuse Inner Harbor off of I-81. A large planned soccer and lacrosse complex in Salina

[10] *See* DEIS Chapter 5, Section 5.3, page 5-18.
[11] *See* Id.
[12] These are the only years in the period for which the current counts are posted. In some years, an estimated number is shown which is based on the actual counts made where they are posted.
See https://www.dot.ny.gov/divisions/engineering/technical-services/highway-data-services/traffic-data

would attract 500,000 people a year.[13] The DEIS also vastly underestimates the employment levels at an Amazon distribution center in Clay that would employ over 1,500 people and greatly increase truck volumes in the area.[14] Finally, NYSDOT mistakenly ignores a proposed semiconductor chip manufacturing plant on 1,250 acres in Clay that could employ 3,000 to 5,000 in temporary construction jobs and 3,000 – 5,000 in permanent jobs. All these trends are known and call into question the basic traffic assumptions employed by NYSDOT in failing to update its modeling projections. More analysis must be performed and revealed to the public for further comment and review.

B. The DEIS Fails to Explain Where Existing and Projected Traffic on the I-81 Viaduct and on Almond Street Would Be Diverted

The 2019 pDEIS predicts that, in a "No Build" scenario, 2020 peak PM hour traffic would be 4,500 vehicles on a viaduct and 3,200 on Almond Street below, for a total of 7,700 vehicles. This breaks down to 58% of the combined traffic traveling above and 42% traveling below. However, under the I-481 Bypass/Community Grid scenario, DOT predicted removal of I-81 would result in diversion of all I-81 traffic and a 41% reduction in Almond Street traffic without explaining where those 5,800 vehicles would be dispersed.

This unexplained discrepancy was amplified in the 2021 DEIS. A No Build alternative based on a 2026 projections predicts a count of 4,650 vehicles on the I-81 viaduct, plus 3,300 on Almond Street below, for a total of 7,950 vehicles. The DEIS predicts that the Community Grid, during the same PM rush hour, would only receive 1,906 vehicles on Almond Street. This would result in an incredible diversion of 6,044 vehicles in that peak hour alone. They do not appear in Salina, State Street or Townsend Street's counts. Once again, the NYSDOT analysis fails to explain to where these vehicles have been diverted to or why such a large discrepancy exists between the agency's two most recent traffic estimates. These scenarios are visually explained in the graphics attached hereto as **Exhibit G.**

These data are even more suspect when one considers the Syracuse Pass Through Traffic Study, cited in the DEIS, which finds that a mere 6% of I-81 Viaduct traffic is through traffic, meaning 94% is local traffic on the way to local destinations[15]. Therefore, NYSDOT's estimates of diverted traffic fail to consider that the vast majority of trips would be those likely to use local streets and arterials and, therefore, highly unlikely to elect to travel another 15-16 miles out of the way to divert to the I-481 Bypass.

Moreover, recent travel time analysis in the DEIS differs significantly with the pDEIS travel time estimates, even though the documents apparently rely on the same underlying data and were published only three years apart. With an I-481 Bypass/Community Grid, diversion from I-81 to I-481 on off-peak hours would add about ten minutes to a trip. Peak-hour travel would experience even greater delays. NYSDOT's predicted diversion of traffic to I-481 would only take place if surface level travel through Syracuse were to deteriorate by at least 10 minutes in off-peak hours. As indicated above, these facts demonstrate that the

[13] McMahon Proposes $25M soccer, lacrosse complex to attract regional sports tourism, Syracuse.com, updated September 15, 2021, available at: https://www.syracuse.com/news/2021/09/mcmahon-proposes-25m-soccer-lacrosse-complex-he-says-will-boost-salina-hotels-hurt-by-i-81-move.html

[14] *Inside Amazon: First look inside massive warehouse as opening delayed to winter*, CNY Central, September 16, 2021 https://cnycentral.com/news/local/inside-amazon-first-look-inside-massive-warehouse-as-opening-delayed-to-winter

[15] *See* Syracuse Pass Through Traffic Study: Documentation of the Data Collection Effort I-81, Syracuse, New York, June 28, 2010.

proposed action, rather than promoting greater mobility, would actually increase traffic problems throughout the region.

C. The DEIS "Study Area" Is Arbitrarily Narrow, Thereby Missing or Ignoring Crucial Traffic Impacts Resulting from Tearing Down the I-81 Viaduct

Figure 1-2 of the DEIS depicts NYSDOT's "study area" for purposes of the most important aspect of its NEPA analysis – the assessment of how alternatives will (or will not) meet the mobility element of the project Purpose and Need. The figure shows an extremely narrow area tightly drawn around the existing I-81, I-481, and I-690 corridors. The verbal description of the study area confirms that the total geographic reach of the study area extends a mere quarter mile on either side of these highway facilities.[16] This deliberate decision to constrain what streets and intersections were evaluated for congestion and traffic performance avoids a wide range of potential effects throughout the city and around the region as a result of anticipated diverted traffic following the proposed removal of the I-81 Viaduct.

The DEIS fails to analyze a number of crucial intersections and where projected traffic would be diverted. In the pDEIS, there were few if any intersectional analyses presented regarding the southbound I-81 traffic that would find it necessary to exit I-81 a considerable distance north of downtown onto North Clinton Street. In the DEIS, five significant intersections are still missing, including without explanation, the intersection of North Clinton Street with Butternut Street adjacent to the newly constructed Butternut Street bridge, Franklin Street at Genant, Clinton Street at Genant, Clinton Street at Division Street, and Clinton Street at Spencer. These intersections would have a serious impact on southbound I-81 traffic entering Syracuse and must be studied. See graphic attached hereto as **Exhibit H.**

This deficiently narrow focus is further demonstrated by NYSDOT's illogical view of the main "generators" of traffic throughout the region. Specifically, the DEIS states on pg. 5-19: "The largest employment centers in Onondaga County, Downtown and University Hill, are located near the Geographic center of the City of Syracuse and are situated south of the I-81/I-690 interchange." Yet, this broad assumption conflicts with information presented in the SMTC Travel Demand model document (see pgs. 46-49, attached hereto as **Exhibit I**), which identifies the five largest "generators" of traffic as: "(a) University Hill Hospitals, (b) Carousel Center, (c) Syracuse University, (d) Hancock Airport, and (e) OnCenter." Even at that, the Carousel Center data included in the DEIS was out of date, since the facility had already become Destiny USA. The DEIS provides no explanation as to why NYSDOT's version of the largest employment centers are solely clustered adjacent to the proposed at-grade arterial and not recognizing major centers that clearly impact regional transportation patterns.

The Study Area must be expanded to account for other major traffic generating uses. Manufacturing, trade, transportation and utilities are the second largest employment sector in the Syracuse region, with 23.8% of employment in this sector. [17] Inclusion of additional traffic generators in an expanded Study Area could have a major impact on the travel demand model and must be updated and shared with the public in a supplemental DEIS.

[16] *See* DEIS Chapter 1, Section 1.3
[17] *See* Centerstate Fact Sheet.

D. Unexplained Differences Between the pDEIS and DEIS Traffic Data Call the Agency's Conclusions Into Question and Require Supplemental Analysis

The DEIS and the pDEIS both used 2013 "Existing" Data for baseline traffic analysis – the same data that NYSDOT began analyzing in their 2016 analysis. Yet, a comparison of the two documents released about two and a half years apart shows that the same "existing" baseline has changed, yet another indication of the need for revisiting traffic analysis in a supplemental document. Two examples follow.

According to the 2019 pDEIS, I-81 from Exit 17 to Exit 29 took 13 minutes to travel northbound in the morning and 14 minutes to travel northbound in the afternoon, with a travel delay of 2 minutes in the morning and 3 in the evening, and a travel speed of 55 mph in the morning and 52 mph in the evening. Now, DEIS Table 5-1 indicates that same 2013 trip took 12 minutes to travel northbound in the morning and 12 minutes to travel northbound in the afternoon, with a travel delay of 1 minute in both the morning and afternoon, and a travel speed of 60 mph in the morning and 49 mph in the afternoon. (See pDEIS and DEIS Table 5-1, 2013 Existing Travel Time, Delay, and Speeds)

Under the pDEIS and DEIS, travel times for key origin-destination pairs in Onondaga County were estimated using output from VISSIM traffic simulations as well as the SMTC Regional Travel Demand Model. VISSIM is a microscopic, time-step, and behavior-based model that analyzes multi-modal traffic flows with the flexibility of modeling all types of geometries and traffic control schemes. Details of the VISSIM model development are documented in the VISSIM Development and Calibration Report located in Appendix C-2, and indicate the model has not been updated since November 2017. However, five "existing" data points have changed for the Destiny USA analysis in Table 5-2 travel times between the pDEIS and DEIS.

E. The DEIS Traffic Analysis Relies on Unreliable Projections for Reasonably Foreseeable Land Use and Demographic Changes

NYSDOT's projections for both population growth and land use changes for the Syracuse region are not adequately described. In the ordinary course, creation of a travel demand model should reflect at least the following four steps: (i) trip generation, (ii) trip distribution, (iii) mode split, and (iv) traffic assignment – all of which rely upon population growth and land use changes.

First, trip generation is analyzed. Regions are set up in zones defined by planning office and jurisdiction. When creating a traffic demand model, the first step is to define the land use assumptions in each zone (i.e. imputing the uses within an area, such as residential neighborhoods versus commercial corridors versus industrial warehouses). These land use assumptions are held constant through all analysis, unless a proposed alternative is anticipated to impact the use of land in the area (i.e. the proposed action is anticipated to change an industrial area into a commercial area). If a change in land use is anticipated, the model's land use assumptions are updated and the trip generation re-run, as different land uses create different trip generations. When a land use assumption changes, it must be clearly noted within the DEIS because it requires confirmation through substantial dialogue with local jurisdictions and city planning authorities.

The second step in creation of a traffic demand model is defining the trip distribution through the origin destination ("OD") tables. The OD tables are based on the trip generation assumptions. OD tables are typically held constant when evaluating various alternatives in order to understand how a proposed roadway modification will affect people's travel choices (i.e. if they would take a different route from their existing home or existing office). When a new OD table is created, it assumes the trip generation

assumptions have changed (i.e. people moved their home and/or work location based on the proposed roadway alternative). By re-running OD tables with different trip generation assumptions, there is no way to credibly compare the various alternatives because the basic premises of the assumptions are changing. It takes an apples-to-apples comparison and makes it an apples-to-oranges comparison.

Next, the mode split is reviewed in order to determine how people and products travel, such as trucks (freight), high occupancy vehicles, public transportation, bicycle, or by foot. Traffic assignment is the final step in the Travel Demand modeling process. The travel demand model estimates thousands of trip patterns using the various roadway connections between OD pairs to find the shortest travel time for the majority of trips. The travel demand model is based on a volume to capacity ratio and is used as a preliminary estimate. It typically requires review and many times some revision to account for congestion levels that the model does not capture.

Land use assumptions must be held constant in creating reliable traffic modeling. Based upon review of the DEIS, it appears that NYSDOT abandoned best practice as described above and arbitrarily picked which land use assumptions to apply to its analysis. NYSDOT considers, at length, potential future development in downtown Syracuse based on a proposed Syracuse-wide zoning text amendment – an action that has not been approved and a zoning document does not, on its own, generate new land use development. At the same time, however, the DEIS fails to consider potential future development in and around Destiny USA. The DEIS simply states the 481 Bypass/Community Grid would not impede or prevent planned development within the Central, I-481 South, I-481 East, and I-481 North Study Areas (DEIS 6-2-1.4.3). This statement is incorrect. The DEIS does not account for the fact that most undeveloped land within the City of Syracuse sits within the Lakefront neighborhood. It also fails to account for the proposed Syracuse Aquarium on Syracuse's Inner Harbor, which would be constructed on a four acre site, span 80,000 square feet, and have a 600,000 gallon tank - three times the as much water as the New England Aquarium.[18] Local officials expect half of the visitors to the Syracuse Aquarium to travel from within an hour's drive of Syracuse, and the other half within a two-hour drive.[19] Hundreds of jobs would be created, both construction and permanent. These are all visitors who are otherwise unaccounted for in NYSDOT's DEIS. How can development near small lots under the existing Viaduct and surface street grid be considered "planned," but major developments with huge economic impacts less than two miles from that area be ignored? The travel demand model must be rerun.

Indeed, the DEIS devotes several pages to the City of Syracuse's proposed citywide rezoning process and potential future developments (and impacts the project could have on these potential future developments since 2015). The City of Syracuse has been undergoing a city-wide zoning text and map update called ReZone Syracuse (see DEIS Figure 6-3-2-4). The "Final Draft Zoning" Ordinance, dated December 2019, proposes to rezone much of the area adjacent to the existing I-81 within the Central Study Area as "MX-5 Central Business District." According to the DEIS, the proposed new MX-5 District would consolidate the numerous existing Central Business District zones that have a wide range of uses allowed and dimensional standards. New development in this area would likely be mixed-use and could include combinations of residential, retail, medical, educational, and office uses. NYSDOT determines that redevelopment of properties consistent with ReZone Syracuse would increase employment and business opportunities.[20] However, increases in growth rates aren't accounted for in NYSDOT's quantitative metrics (nor in qualitative metrics, such as parking).

[18] *McMahon proposes $85M aquarium at Syracuse's Inner Harbor*, Syracuse.com, October 4, 2021, available at: https://www.syracuse.com/news/2021/10/mcmahon-proposes-85m-aquarium-at-syracuses-inner-harbor.html

[19] *Id.*

[20] *See* DEIS Chapter 6, Section 6-3-2.

It is plainly arbitrary for NYSDOT to fail to account for other developable properties owned by Pyramid/Destiny and other property owners in the Lakefront Area and simply categorizing these sites as vacant land when creating its traffic projections. In fact, land in the Lakefront Area is slated for development of the new Syracuse Aquarium – a proposed development that would be an additional traffic generator within a block of Destiny USA. There are also numerous new apartment homes created with the intent of developing a mixed use community in a portion of the Lakefront Area; building on the tourism assets that already exist. This error is even more egregious when one considers that Destiny has already received notice from the agency of its intention to condemn some of that very same developable land in order to build out the 481 Bypass/Community Grid with a five acre scenic overlook.[21]

III. NYSDOT's Qualitative Traffic Analysis Is Fundamentally Flawed

The qualitative assumptions used by NYSDOT for modeling ignore basic facts as well as common sense, creating a flawed model on which all other assumptions and analyses are based. These qualitative issues include treatment of transportation logistics projects, treatment of intersections, treatment of parking, and use of COVID-19 impacts for certain quantitative assumptions, but not others.

A. The Agency Makes Inconsistent Parking Assumptions Based in Part on Anticipated Pandemic Effects

NYSDOT has used the COVID-19 pandemic to modify assumptions as NYSDOT deems fit, without any underlying data to support such assumption. Parking demand assumptions were made on the basis that more people will be telecommuting, reducing the need for parking, with the DEIS stating "… as a result of anticipated continued increase in telecommuting and to reflect an increase in the use of parking information technologies in the future, it was determined that a 25% reduction in the parking spaces to be mitigated would be applied to account for an anticipated increase in the number of people who will continue telecommuting over the long term, resulting in a reduced need for parking supply." (see DEIS p. 5-178)

Oddly, 2020 remained the parking base year for which a future project is analyzed (unlike the other scenarios which were changed to 2026 and 2056). The rationales provided in a footnote states, "the original analysis was based on an ETC [estimated time of completion] of 2020, and while the ETC has been revised to 2026, the ETC change does not change the analysis or conditions, therefore the 2020 analysis is still valid". (see DEIS p. 5-174). On one hand, NYSDOT argues that there have been so few changes that a parking ETC analysis of 2020 is valid, while on the other providing a 25% reduction in the need for parking based on telecommuting from COVID-19. ***NYSDOT cannot simply pick and choose which variables are convenient for their analysis.*** While parking reductions may be true for some industries, Syracuse is a city of anchor institutions: hospitals and universities that are less likely to feel the impacts of telecommuting. Even with telecommuting, a 25% reduction is arbitrary at best.

B. The Agency Makes Inconsistent Trucking/Logistics Assumptions Based in Part on Anticipated Pandemic Effects

Increases in trucking and transportation logistics expansion were largely ignored by the DEIS, as were substantial recent trucking projects within the Syracuse area. For example, the DEIS ignores an

[21] Please see letters attached hereto as **Exhibit J**.

increase in employment at an Amazon warehouse constructed in Clay, which has announced hiring 500 more employees than initially expected. This warehouse has been planned for multiple years, so it is unclear why the DEIS would not track and update assumptions regarding the warehouse.[22] Traffic consultants have predicted the Amazon warehouse will result in 1,289 vehicles entering or exiting the distribution center during peak morning hours, and 1,268 vehicles during the peak afternoon hours. This is in addition to an Amazon delivery station in Dewitt which consists of a 112,000 sq. ft. warehouse, 50 – 100 full and part time jobs, and hundreds of independent contractors. While the DEIS admits some alternatives would improve highway freight movement (see discussion of the Viaduct Alternative on DEIS p. 5-124), the 481 Bypass/Community Grid would broadly distribute truck traffic ***on the local street system***. Truck traffic would increase more substantially on MLK, Jr. East, Almond Street, Clinton Street, and Salina Street). The DEIS admits the 481 Bypass/ Community Grid will bring trucks, noise, and pollution to the street level, and this is without taking into account major new trucking and transportation logistics projects.

While NYSDOT made many assumptions regarding parking based on COVID in order to fit their narrative, no such assumptions were made in the DEIS regarding the potential increase in shipping demands due to people sheltering at home or becoming reliant on online ordering. Nor were new assumptions made based on travel demand times. COVID-19 has changed when people are on the road. Perhaps there isn't as much of an early morning rush hour, but numerous car trips around lunchtime. Flexibility in work schedules may lead to more people getting on the road for a long weekend on Thursday evening. The types of trips – such as suburb to suburb – may change based on Census numbers. None of these new behavioral metrics are accounted for. If COVID would have a 25% impact on parking, wouldn't COVID also impact the trip times and destinations that should be reviewed in a DEIS?

C. NYSDOT Has Consistently Refused to Release Critical Data

Destiny USA has wanted to understand NYSDOT's quantitative and qualitative assumptions for several years. Consultants Parametrix Engineering ("Parametrix") attempted to request additional data from NYSDOT to better understand these assumptions. Parametrix submitted Request No. FMO-19-01669 (the "FOIL Request") to NYSDOT, which asked for copies of specific documents in eight categories, to wit, the documents containing the data and assumptions underlying the pDEIS. Most, if not all, of the categories request <u>data only</u>, which is specifically exempted from the intra-/inter-agency materials exception and are <u>not</u> permitted to be withheld from public scrutiny. The request included:

1) "All VISSIM files utilized in preparation of the Preliminary DEIS in readable electronic format." VISSIM is traffic simulation software, and by definition "VISSIM files" are "statistical or factual tabulations or <u>data</u>" within the meaning of Section 87(2)(g)(i) (emphasis added).

3) "The travel demand model <u>data bank</u> utilized to forecast redistribution of traffic and assumptions utilized for trip diversion under the Community Grid alternative in a readable electronic format." Again, this request is clearly for "data" within the meaning of Section 87(2)(g)(i).

[22] *Onondaga County Approves $71 million tax break for giant warehouse in Clay*, Syracuse.com October 31, 2019, available at https://www.syracuse.com/news/2019/10/onondaga-county-approves-71-million-tax-break-for-giant-warehouse-in-clay.html

4) "All trip tables from the travel demand model . . . in a readable electronic format." Yet again, this request is clearly for "data" within the meaning of Section 87(2)(g)(i).

For months, the request was pending until ultimately denied under the intra-/inter-agency exception. Now that the DEIS has been issued and data changes are even more widespread throughout the DEIS, it is imperative that all pDEIS and DEIS data be released so inconsistencies in data can be addressed and the full impact can be understood. The data must be made available to the public in order for the public to reasonably and rationally review and comment on any NYSDOT DEIS. This is another reason the NYSDOT should commence a supplemental DEIS process.

IV. NYSDOT Fails to Reasonably Assess How the Preferred Alternative Could Adversely Impact the Communities it Purportedly Aims to Benefit

NYSDOT touts the 481 Bypass/Community Grid as a connector of a community historically divided by the existing I-81 Viaduct. The DEIS attempts to paint a rosy picture of what a future without the existing I-81 Viaduct would be – wide open pedestrian spaces, parks, and bike paths. In realty, though, NYSDOT is proposing to lower the highway to street level and in so doing negatively impact the communities it is reportedly focused on assisting by increasing local street traffic, increasing noise and air pollution, adversely impacting public transportation routes, and diminishing safety and housing opportunities. By not adequately reviewing and disclosing these fundamental impacts, NYSDOT has failed to take NEPA's requisite "hard look."

A. Bus Impacts

Buses serve as just one example. NYSDOT concludes that existing bus routes won't be impacted under the 481 Bypass/Community Grid. However, NYSDOT admits, "… many bus routes potentially would be affected by implementation of the Community Grid…,"[23] on existing bus operations that may require rerouting of buses for portions of their existing bus service routes. This may subsequently affect bus stop locations and possibly schedules. There are far too many "may" statements in this analysis to know the truth. While bus usage is a transportation issue, bus access is also an equity issue that must be considered in greater detail.

B. Pedestrian Safety

Similarly, school and neighborhood safety is a serious concern. In order to accommodate traffic which was previously elevated but would be at ground level under the 481 Bypass/Community Grid, a roundabout would be constructed immediately adjacent to the Dr. King Jr. Elementary School. This traffic circle would be approximately 120 feet from the elementary school, with approximately 35,000 cars a day passing through a pre-kindergarten through grade seven school serving over 500 children, the majority being in grades kindergarten to grade five.[24] When NYSDOT was asked about the proposed roundabout, NYSDOT I-81 Mark Frechette stated, "More to come on the roundabout. Give us a chance to do the

[23] *See* DEIS Chapter 5, Section 5.6.2, p. 5-188

[24] US News and World Reports Education: Dr. King Elementary School Syracuse, available at https://www.usnews.com/education/k12/new-york/dr-king-elementary-school-205065

appropriate analysis."[25] Shouldn't that analysis have been conducted already, before proposing an alternative?

At public meetings, NYSDOT officials have said pedestrian safety was considered, with sidewalks and bike access being located on the west side of the roundabout. Yet this does not take into consideration students who might have to cross the roundabout to walk to school, or whether peak volumes of traffic will be flowing through this area at the same time students are traveling to or leaving from the school. Creating an intense traffic circle so close to a school for young children disproportionately impacts the local community. Regardless of location, the elimination of an elevated main interstate puts tens of thousands of cars through City neighborhoods.

Recent press reports and public statements by NYSDOT officials cited above seem to indicate that the agency will be reconsidering this roundabout proposal. Yet, slight modifications to the location of the roundabout facility would do nothing to solve the basic challenge associated with the agency's preferred alternative. Moving the roundabout a couple of blocks north or south of the school (which has been discussed in public) would still impact neighborhood students walking or riding to school. Regardless of its ultimate location, the community's objections to the roundabout feature highlight the inherent flaw in the Grid proposal which would put tens of thousands of vehicles on city streets instead of a limited-access facility. Without the I-81 Viaduct, or a reasonable replacement, traffic would simply move to neighborhood streets and intersections, adversely impacting the community in multiple ways.

Image available at https://webapps.dot.ny.gov/i-81-viaduct-project

[25] *NYSDOT hears 'loud and clear' almost no one wants I-81 roundabout near school*, Syracuse.com dated September 9, 2021, available at https://www.syracuse.com/state/2021/09/ny-dot-hears-loud-and-clear-almost-no-one-wants-i-81-roundabout-near-school.html

C. Air Quality, Noise, and Visual Resources

The DEIS also concludes that there will not be an impact to any environmental justice communities in regard to air quality, noise, or visual resources. According to the DEIS, the 481 Bypass/Community Grid Alternative would result in *some* adverse visual impacts, but these would be offset by beneficial visual effects. In some locations, air pollution concentrations are projected to remain the same or decrease when compared with the No Build Alternative due to shift in roadway geometry, but in other places they will increase. Without abatement, the noise level increase at 21 receivers would be perceptible, and 19 of these 21 receivers are in environmental justice communities. Ultimately, while the 481 Bypass/Community Grid was not found to have detrimental impacts on environmental justice communities, this could very well be untrue if accurate facts were used and metrics corrected. If additional trucks suddenly enter the street, this would increase emissions and, in turn, air pollution and noise. With traffic slowing and cars are idling at thirteen new traffic lights, pollution will increase. The air quality impacts due to these traffic delays must be analyzed and crucial health and quality of life issues must be fully and accurately reviewed for the health and wellness of local residents.

D. Housing Displacement

It is unclear if the DEIS truly captures housing displacement. For example, the DEIS provides lists of buildings that would be demolished or displaced due to each alternative. However, NYSDOT images show additional housing displacement. The DEIS indicates that under the 481 Bypass/Community Grid, 35 employees would be displaced, but no homes would be. Yet this image of the proposed traffic circle next to the Dr. Martin Luther King Jr. School does <u>not</u> show houses that are immediately adjacent to the highway or the schools. It is unclear why NYSDOT isn't showing these houses in the images and what impacts could exist for the Pioneer Homes, McKinney Manor, and Central Village.

Image available at https://webapps.dot.ny.gov/i-81-viaduct-project

V. NYSDOT Fails to Recognize or To Review Accurately How the Preferred Alternative Would Negatively Impact Syracuse's Industries and Tourism Economy

A. Tourism in the Syracuse Region

As the November 1999 Tourism Assessment makes clear, it has been a long-term goal of Syracuse and Central New York to be considered a unique and well-known destination for overnight visitors. Business conventions, college sporting events, NYS state fairgrounds, and Destiny USA have all made Syracuse a destination within New York.[26]

Since 1999, this trend has continued. The planned Syracuse Aquarium has an anticipated economic impact of $50 million a year. Business opportunities are booming with the proposed Clay semiconductor chip manufacturing plant which would bring a $10 billion to $20 billion investment to the area. Opportunities for tourism continue to grow and, with these opportunities, increased numbers of people, tax revenues, and local benefits.

[26] *See* Tourism Assessment.

The Syracuse Hancock International Airport is also slated for expansion, with a new parking facility, new amenities, and a new Federal Inspection Statement being constructed to allow the airport to accommodate international flights. A new airline and four new flight routes will also enhance the airport's offerings beginning in November 2021 and will cater largely to leisure (rather than business) travelers, enhancing tourism opportunities in the region.[27] These changes are all part of a 2021 Master Plan Update for the airport. These important updates to the airport – and subsequent increase in tourism and traffic – are not accounted for in the DEIS.

However, NYSDOT has admitted the DEIS does not include any consideration of future economic development, and review of data indicates that NYSDOT's assumptions regarding potential impacts on long-established businesses along I-81 are flawed. While we have previously noted trucking and transportation logistics as economic growth segments which were not properly accounted for, the same is true for Destiny USA and the hotel and tourism industry in the Syracuse region.

The DEIS states at pg. 6-142 that the indirect displacement of an individual business due to market change is an economic issue, not environmental, and is not, in itself, the subject of the DEIS. "However, the DDR/DEIS does consider the potential effects of displacement at a neighborhood level, i.e., whether a project could lead to indirect displacement that in turn leads to disinvestment in a neighborhood, which is an environmental concern."[28] This narrow approach violates requirements of the CEQ NEPA regulations,

[27] Onondaga County's Aquarium Study hints at Syracuse Airport expansions, cnycentral.com, October 6, 20201 available at https://cnycentral.com/news/local/onondaga-countys-aquarium-study-hints-at-syracuse-hancock-international-airport-expansions.
[28] *See* DEIS Chapter 6, Section 6-3-2, p. 6-142

which clarify that when "economic or social and natural or physical environmental effects are interrelated, the EIS will discuss all of these effects on the human environment." See 40 C.F.R. 1508.14. Impacts to Destiny, as the largest employment center in the Lakefront Area and one of the largest employment centers in the Syracuse region, could clearly have potential negative impacts in the study area. This would clearly be an "interrelated effect" of the proposed action, one that the DEIS as currently drafted essentially ignores. NYSDOT must review in a supplemental DEIS its economic impact analysis to extend beyond "displacement" at the neighborhood level.

B. Destiny USA Tourism and Economic Impacts

Detrimental impacts on Destiny USA would certainly have a broader reaching impact on the entire local community, as clearly evidenced by Destiny USA General Manager Robert Schoenec's economic analysis, attached hereto as **Exhibit K.** Prior to the impacts of COVID-19, Destiny USA generated approximately $38.5 million in annual sales tax to the local government and state government.[29] NYSDOT may not have considered this, though, as the DEIS fails to classify Destiny USA as an "anchor institution" – the DEIS description for employers ranging from 943 to 9,525 employees - a gross oversight for a business that employs approximately 5,000 people and employed over 5,500 prior to the COVID-19 pandemic. Similarly, Destiny is one of the largest employers in the region, but is not included as a large "employment center" despite being classified as an "employment center" in the Centerstate Fact Sheet. It seems that instead, the DEIS capriciously considers the individual impact of the businesses located within Destiny, not the cumulative impact. However, this is not justified and would be analogous to every department at Syracuse University being considered separately.[30]

Importantly, the DEIS appears to wrongly model for the 2013/14 period when it stated Destiny USA consisted of 1.5 million square feet of Gross Leasable Area. However, that information was accurate as of 1990. The center was substantially expanded to 2.4 million square feet of GLA in August 2012 and was substantially occupied by 2013, the agency's "base year." While NYSDOT's narrative cites to the expanded 2.4 million square feet,[31] the Syracuse Passthrough Traffic Study (on which NYSDOT based the traffic model) was conducted in 2010 using the outdated square footage figure of 1.5 million square feet. Thus, whatever weight the Travel Demand Model applied to the Destiny USA was dramatically understated.

Further, Destiny USA has cleaned up an entire previously industrial neighborhood of Syracuse and brought many tourists to the area as the eighth largest enclosed shopping complex in the United States and the largest shopping, dining, and entertainment venue in New York State. Rather than use these important facts to stress the importance of Destiny USA to the local economy, the DEIS seems to take a position that Destiny USA's reach is so far, and customer base so wide, that no impact would occur despite the cutting off access to the property as a result of implementation of the 481 Bypass/Community Grid. NYSDOT incorrectly claims that certain businesses, such as Destiny USA, are "resilient" to traffic changes based on the DEIS's faulty traffic analysis, including the Origin-Destination data.

Rather than acknowledge the importance of vehicular travel for Destiny USA, NYSDOT claims that Destiny's wide consumer base will not be deterred by additional travel time. There are no data points to back up this claim, nor any analysis of how local and regional shoppers will react to increased travel times. NYSDOT also claims Destiny USA does not receive a substantial amount of consumer traffic from

[29] See **Exhibit K**, page 10
[30] *See* DEIS Chapter 6, Section 6-3-2
[31] *See* DEIS Chapter 6, p. 6-154

those who simply saw Destiny from the road. NYSDOT claims "only" 2.8% of visits would be lost by the reconfiguration of I-81 into a Community Grid.[32] Destiny's own data clearly indicates this is incorrect.[33] The DEIS fails to address the large number of consumers who arrive by coach bus – a sector where Destiny USA saw an 11% increase in traffic between 2018 and 2019. If tour bus routes are impacted, Destiny USA's customer base could be impacted as well. Syracuse's Centro bus routes to Destiny USA may be impacted as well. Potentially impacted bus routes include Route 45 Destiny USA; Route 50 Destiny USA via I-81; Route 550 Destiny USA. If NYSDOT isn't sure about which routes will change, how can they be sure there will not be an impact?

As a general matter, NYSDOT would have known all of these facts had they ever met with Destiny with the goal to understand it and I-81's impacts. NYSDOT never made that effort despite Destiny USA's continued outreach and involvement in the proposed project.

C. Hotels and Hospitality Tourism and Economic Impacts

More generally, NYSDOT takes a flippant approach to tourism, including on the hotel industry, and especially in light of COVID-19. While NYSDOT used COVID-19 to refine parking assumptions, it wholly ignored COVID-19's detrimental impact on tourism and hotels. For some hotels in Syracuse, COVID reduced tourism dramatically, to the point there were few (if any) profitable months.

Many hotels in Syracuse rely on same-day bookings which are largely attributable to a hotel's proximity to I-81 and visual cues. These same hotels also rely on conferences that are booked due to Syracuse's central location and accessibility. Hotels anticipate a significant decrease in conferences due to construction related to the 481 Bypass/Community Grid. This, coupled with the impacts of COVID, could result in major impacts to the hotel sector, as well as a major loss in sales tax and property tax revenues.

How has NYSDOT responded to hotel owner's concerns? By simply arguing that while there will be approximately 11,000 ***fewer*** cars a day passing by hotels off of I-81, overall the hotels will be benefitted due to construction workers using hotels during the project, "better" connectivity, and ***more*** economic activity in the area after the 481 Bypass/Community Grid is complete. While NYSDOT states there will be more economic activity, this activity is not included in DEIS assumptions. NYSDOT has told the hotel industry that I-481 could attract new "highway-oriented investments"[34] which benefit hotels. These "highway-oriented investments" are also excluded from any "future development" analysis in the DEIS. NYSDOT admits total bookings will decrease by approximately 1.3%, which it considers "small" and offset by the "national"[35] names of hotels. Without any backup, NYSDOT says the use of smart phone wayfinding reduces hotel dependency on capturing trips through visual recognition from highways. These examples reiterated that NYSDOT using speculative assumption, touting increases in economic development when convenient, but not accounting for it in the DEIS data.

Destiny USA and tourism more generally are one sector of Syracuse's broader economy. If so many assumptions and speculative or conclusory statements were made for this economic segment, it is likely other economic segments have been glanced over as well – this is not the hard look required for a major infrastructure project's DEIS. Destiny USA, hotels, and tourism have all been impacted by the restrictions

[32] *See* DEIS Table 6-3-2-11
[33] *See* **Exhibit K**, page 6.
[34] *See* NYSDOT Hotel Presentation dated September 13, 2021 (the "Hotel Presentation"), Slide 17, attached hereto as **Exhibit L.**
[35] *See* Hotel Presentation at 16.

necessitated by the COVID-19 pandemic. Improperly analyzing the traffic impacts and potential consequences to these crucial Syracuse area businesses could have grave ramifications.

VI. In Predetermining Its Desired Outcome, NYSDOT Has Failed to Hear Concerns of Citizens in the Greater Syracuse Area

NYSDOT has spent years promoting its preferred alternative without truly listening to the concerns of the citizens impacted by this project both within the City of Syracuse and the surrounding suburbs. There is substantial concern that the 481 Bypass/Community Grid has largely disregarded potential impacts on the suburbs. There is also a genuine concern that, for the City of Syracuse, the 481 Bypass/Community Grid will simply bring a highway to street level and repeat the sins of past generations.

A. The Proposed Action's Impact on Areas Outside of Downtown Is Not Fairly Analyzed

The DEIS conducts a cursory review of suburban areas, including the I-481 East Study Area which would have substantial additional traffic under the 481 Bypass/Community Grid. A large volume of traffic would now travel through the heart of DeWitt as a result of the expansion of a major intersection in this small village, causing an increase in volume that will more than double. NYSDOT has said these communities would not qualify for sound barriers or other remediation due to low population density. However, no adequate studies were conducted in suburban communities such as DeWitt for noise, sound, or emissions, including from idling traffic which is likely to increase on Route 92 and in the Pickwick neighborhood.

Additionally, Interstate 81 is today a bustling connector between points south and west of Syracuse via the New York State Thruway (I-90) to the west. Removing this important central segment would inevitably divert much heavy truck traffic through Syracuse streets and rural roadways southwest of the city, imperiling small communities, narrow roadways, and the water quality of Central New York's pristine and picturesque Finger Lakes. No attention was paid to this inevitable byproduct of a Community Grid approach within the DEIS.

B. The DEIS Misrepresents the Potential for New Development If the I-81 Viaduct is Removed

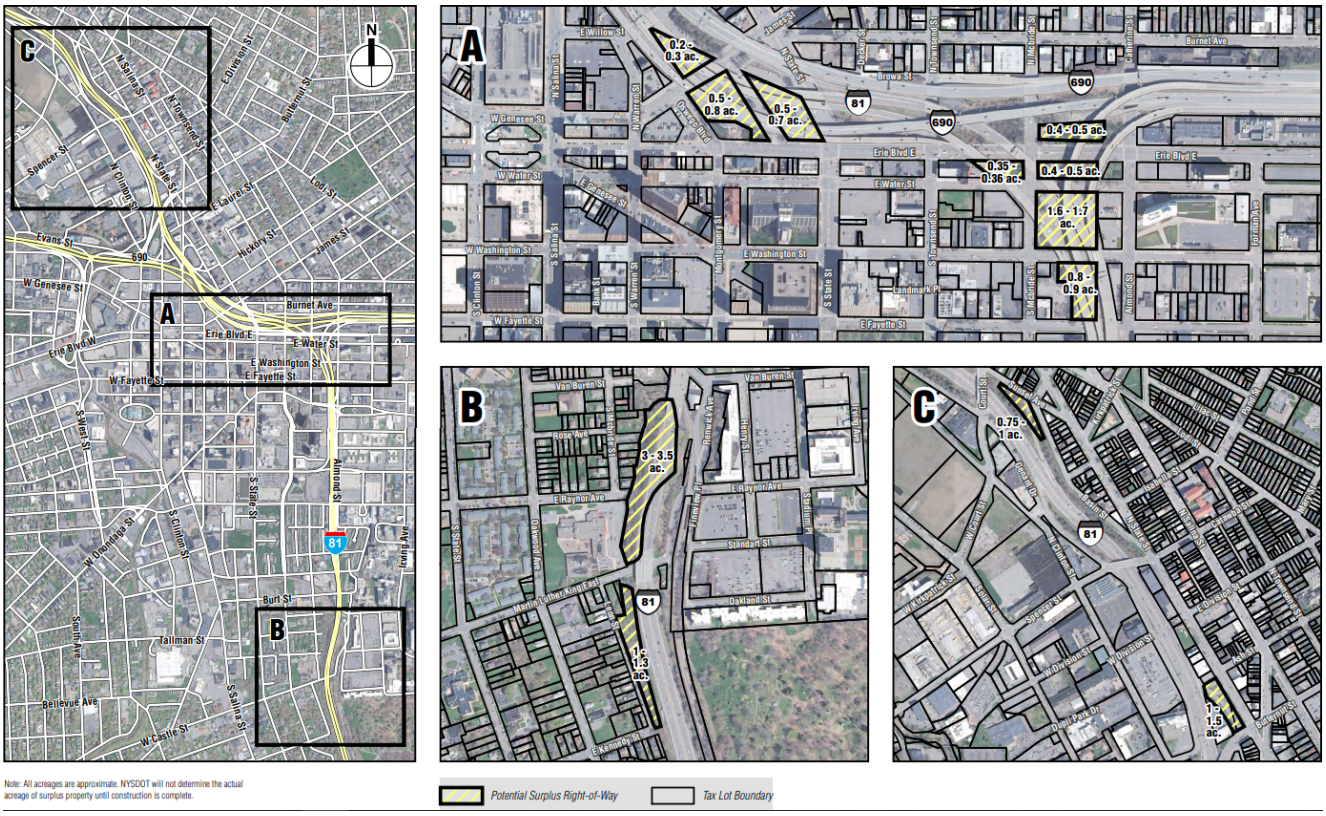
In the City of Syracuse, it remains unclear how a Community Grid reconnects the area. Simply removing the existing I-81 viaduct structure will not reconnect the area. Community connectivity results from so much more than simply taking down the viaduct. It depends on the ability of people to both live and work within the community. A concrete land use plan is needed. The Land Acquisition, Displacement, and Relocation strategy outlined in the DEIS is scattered and does not result in any meaningful change or reconnection of the community. On the contrary, the I-481 Bypass/Grid bifurcates Syracuse from the Lakefront Area, Fairgrounds, amphitheater, Amtrak station, and Syracuse Hancock International Airport.

NYSDOT represents that the I-481 Bypass/Community Grid will result in newly available land for development. Such a statement is unfounded. This plan incorporates (i.e. takes) 20.44 acres of land to create the I-481 Bypass/Grid, but results in a purported 10 to 12.5 aces of, "surplus transportation right-of-way," that could be converted to another use.[36] However, the 10-12 acres that would become available for development under the Community Grid are not providing a critical mass. In reality, they are spread around

[36] *See* DEIS Section 6-2-1 Neighborhood Character, Subsection 6-2-1.4

throughout the Study Area in several parcels, including some next to existing homes and others next to an elementary school. The so-called benefit from having this "new" land lacks market potential for development at best, and more likely, could result in a highway at street level with lower income communities bearing the brunt of the impacts. Instead of these unreasonable assumptions of future development, NYSDOT should be investing the money it proposes to widen/improve a bypass around Syracuse into Syracuse itself.

As seen in DEIS Figure 6-2-1-12, the surplus parcels are scatted within a wide area. In Area A, 8 sites would be available, the smallest being .2 acres and the largest being 1.7 acres. Of those sites, four are highly irregular shapes and could present challenges for development. In Area B, two sites would be available, one measuring one acre, the other measuring 3.5 aces. This parcels are again extremely irregular, with the one acre site being long and narrow. Neither parcel is contiguous with the other, with Martin Luther King Blvd. East bifurcating the sites. In Area C, two sites would be available, one measuring .75 acres, the other measuring 1.5 acres. Neither parcel is contiguous, multiple streets run between the two areas. Additionally, the .75 acre parcel is triangular and may present challenges for development.



DEIS Figure 6-2-1-12

Even if NYSDOT's goal is to reconnect streets and unify communities, nothing in the DEIS suggests that outcome would result. NYSDOT cannot simply assume tearing down I-81 will result in a unified community – which is what they have done. It remains unclear how the extremely wide, multi-lane Community Grid could be considered a pedestrian-friendly, unifying environment. How would "walk signals" be timed, especially during peak vehicle and pedestrian travel times? Will it take multiple minutes to cross the street? Will there be adequate pedestrian protections from the anticipated 18-wheel trucks that

will use the new Grid? As detailed below, other projects in New York demonstrate the likely unanticipated consequences of moving heavy traffic from a limited-access facility to several neighborhood streets.

C. Other Projects That Have Torn Down Elevated Highways Do Not Support NYSDOT's Promises of Community Benefits or Are Not Comparable

Other projects have promised the same community benefits that NYSDOT claims will result from tearing down the I-81 Viaduct but, following millions of dollars of planning and construction, have failed to deliver on those promises. Consider the I-895/Sheridan Expressway project. In 2019, the Sheridan was turned into a boulevard as part of an "enhancement project" to connect the surrounding neighborhood to waterfront areas. However, in reality, the agency created a ground-level highway that experiences heavy traffic and is difficult to traverse. This new ground-level highway measures approximately 160 feet at the widest points (shown below) and is elsewhere generally 100 feet across. On any given Sunday, you can walk in this area and be greeted by speeding 18 wheelers, crosswalks that require a rapid pace to navigate, and the smell of vehicular emissions in the air.

As discussed in a series of Tweets by Alex Armlovich of the Manhattan Institute, "Why is the 6-lane "community grid" at ground level considered 'better' than the same-sized elevated highway that you can much more easily & safely cross & bike under?"

By simply removing a highway and bringing traffic to the street level, NYSDOT is not bridging a community but simply running high volumes of traffic through a residential area. Even with a 30 mph speed limit, the volume of traffic and time of idling becomes an issue from an air quality and pedestrian perspective.

Other urban areas have removed highways and created urban boulevards, each with varying levels of success but none truly similar to the proposal to tear down a heavily used portion of a mainline, two-digit Interstate facility, as is the case here. In the District of Columbia, for example, a portion of I-295 was removed and turned into an urban boulevard. However, this portion of I-295 was not acting as a heavily used interstate like I-81. In Milwaukee, the Park East Freeway was removed in 2002 and 2003. Unlike Syracuse's I-81 project, the Park East freeway was a lightly used, dead-end spur that was physically proximate to a larger facility with ample capacity. In addition, the Milwaukee project resulted in a gain of almost thirty acres of prime downtown real estate and $1 billion in private investment. The I-481 Bypass/Community Grid would result in only a fraction of acreage becoming available, and dispersed throughout the Study Area. The I-481 Bypass/Community Grid would also require rerouting to a distant highway that requires substantial updates to address capacity. It is therefore unlikely to create development similar to Milwaukee. In Baltimore, a portion of highway was removed and turned into a boulevard, however this was again a short spur that ultimately terminated in a town outside Baltimore city and did not connect to other major highways or serve as a major route. In sum, none of these removals are factually similar to what New York State seeks to propose with respect to I-81. Rather, the converted segments involved shorter urban spurs or incomplete segments of the Interstate, as compared to the heavily-used, major urban throughway like I-81.

CONCLUSION

Interstate 81 is a crucial connector for the Central New York region. NYSDOT has acted arbitrarily and capriciously by violating well-established NEPA procedures and conducting plainly flawed technical analyses in its review of proposed options for the future of Interstate 81. In doing so, and by prematurely

promoting an inherently flawed transportation solution, it has put the regional economy and businesses at risk. NYSDOT's preferred alternative does not meet the agency's own objectives for the proposed action. The agency's predetermined outcome would fail to truly re-connect neighborhoods within Syracuse and act for the benefit of disadvantaged communities. Rather, NYSDOT's preferred alternative results in a highway at street level under the guise of a "community" grid, which will create more congestion, increase noise, air pollution and GHG emissions, diminish safety, and generally impair established regional economic activity.

In sum, NYSDOT's DEIS reveals a proposed option that fails to meet the project's stated objectives, community needs, or long-term vitality of the Syracuse and Central New York region. NYSDOT can and should do better and objectively review new, as well as more effective solutions to the transportation needs of I-81 users and local residents. We and our client remain willing to engage with NYSDOT and FHWA representatives to advance a project that functions, meets the objectives of local residents, and will be a benefit to all stakeholders.

Sincerely,

Fred R. Wagner

Enclosures

Exhibit A – 1999 Cummings McNulty Tourism Assessment
Exhibit B – Letter from Stephen J. Congel re: Interstate 81 Project
Exhibit C – Centerstate 2020 Fact Sheet
Exhibit D – Table 1
Exhibit E – DEIS Table 5-7
Exhibit F – Tables 1, 2, 3
Exhibit G – Diverted Vehicles Graphic Analysis
Exhibit H – Intersections Graphic Analysis
Exhibit I – Travel Demand Model Excerpt
Exhibit J – NYS Condemnation Letter
Exhibit K – Destiny Economic Analysis
Exhibit L – NYSDOT Hotel Presentation

Exhibit A

Tourism Assessment
&
Development Strategy
for
Syracuse and Central New York

Final Report

November 1999

By

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Introduction

This project is to develop a Regional Tourism Assessment and Strategy and it is intended to serve as a specific, actionable plan and direction for the long-term.

The purpose of the study is to create a viable and realistic tourism economic development action plan that will position the region as a unique and well-known destination and increase the number of overnight visitors and their length of stay in the region, thereby increasing the number of tourism-related jobs and economic development opportunities in the region.

This project will accomplish the following:

- Understand tourists' perceptions and wants in terms of desired attractions and supporting infrastructure
- Identify the region's product inventory of tourist attractions and supporting organizational infrastructure
- Determine the region's comparative advantages
- Assess the tourism product inventory to identify strengths and weaknesses, gaps and areas of opportunity versus other regions and leading travel destinations
- Identify infrastructure gaps (i.e. lodging, signage, transportation and information) needed to better serve tourists who visit the region
- Develop a strategic plan which, in addition to the above, identifies and makes recommendations as appropriate on key issues affecting tourism in the area; identifies current and potential market segments; positioning an image; specify areas for improvement, enhancements or repackaging of current product offerings; and identify goals, objectives and strategies for action
- Quantify the economic impact of tourism on the economy and project future growth

While the Central New York region (defined by the client as the counties of Onondaga, Madison, Cayuga, Cortland and Oswego) is identified as the coverage area for this study, it was not within the contract scope to conduct a separate study for each county. Rather, the scope was to consider both a) Syracuse and b) the region as a whole. Each county has its individual tourism strengths and market niches. Syracuse is an overall magnet for the region and has the greatest critical mass, the largest promotional effort, the greatest number of rooms and attractions and draws the greatest number of visitors to the area. To that extent, each county benefits and draws visitors from the Syracuse sphere. For that reason this report uses Syracuse and Onondaga County as a focus for its attention although the research and many of the recommendations and action strategies are relevant to the region as a whole and individual counties.

The research for this report was conducted and data collected over a period from late 1997 to summer of 1998; the preliminary draft report was submitted in October 1998 followed by committee review, input and final drafting. Statistical data availability is always delayed from actual collection. To prepare meaningful analysis, comparable time frame data must be used. This report utilized the most recent available statistical data at the time of data collection. For the economic impact study, the base year used in the analysis is 1995. This is the most recent year with comprehensive data for the tourism industry. Where more recent data exists in certain sectors, for comparison purposes, it was not used to ensure more reliable results.

Cumings McNulty, led by Trudy McNulty, project director, prepared this report and subcontracted with several associates to complete portions of this study. The current market information was determined through a contract with D.K. Shifflet with interpretation and trends by Jan Kemmerling Clack. The economic impact work was conducted by Economics Research Associates led by Daniel Martin with Dana Atallah and Anita Johnson. The Syracuse Area Visitor Satisfaction and Image Study was prepared in July 1998 by Dr. Daniel R. Fesenmaier along with the following support staff: Bridgette Pearson, Marianna LaHood, Nandini Nadkarni, Tory Storm, Anne Gean, and Karen Giunta.

Executive Summary

This study is a **Tourism Assessment and Development Strategy for Syracuse and Central New York.** Central New York was defined by the client, the Metropolitan Development Association of Central New York, Inc. (MDA), to include five counties with: Onondaga, Oswego, Cayuga, Cortland, and Madison counties. These five counties will be identified in the report as the "MDA Region." There is no intent by the authors to infer that these five counties should be considered either a separate or ideal region for tourism purposes: each belongs to an established tourism region; each participates with other destinations when it is in their interest to do so.

The study was researched and data collected between late 1997 and summer 1998. In all cases, the most recent data available was used where the comparable data could be obtained. A preliminary draft was submitted in October 1998 followed by review and input with the Final Report submitted August 1999.

The study was designed to:

a) Position the region as a unique and well-known destination and increase the number of overnight visitors and their length of stay;

b) Understand tourists' wants in terms of desired attractions and supporting infrastructure;

c) Identify the region's product inventory of tourist attractions and supporting infrastructure;

d) Determine the region's comparative advantages;

e) Assess the tourism product inventory to identify strengths and weaknesses, gaps and areas of opportunity versus other regions and leading travel destinations;

f) Identify infrastructure gaps needed to better serve tourists who visit the region;

g) Develop a strategic plan which, in addition to the above, identifies and makes recommendations as appropriate on key issues affecting tourism in the area; identifies current and potential market segments; positioning an image; specify areas for improvement, enhancements or repackaging of current product offerings; and identify goals, objectives and strategies for action

h) Quantify the economic impact of tourism on the economy and project future growth.

This Final Report includes the following sections:

A) Introduction
B) Executive Summary
C) Trends: National, New York State, Onondaga County
D) Situation Analysis: Tourism Product and Infrastructure; Tourism Organizational Infrastructure
E) Current Tourism Market
F) Visitor Satisfaction and Image Perceptions

G) Key Issues: Community Understanding of Tourism; What Region Should Syracuse/Onondaga County Be In; Syracuse Positioning and Image; Upstate Demonstration Project; Potential Attractions & Infrastructure; Convention Center
H) Potential Markets
I) Economic Impact
J) Action Plan
K) Appendix (which includes the research charts for F and H above)

This report looks at both leisure and business tourism and includes both the individual and group markets. Attractions are defined within the report as magnet, linger-longer, and resident quality of life. Events are defined as being tourism events or resident events.

While tourism as an industry brings a great deal to a community including the potential of increasing non-tourism related businesses, community pride, and an expanded quality of life for residents by supporting more attractions, restaurants, etc., this report looked at tourism primarily as an economic development tool.

Report Focus

In order to stimulate tourism economic impact in the most cost effective manner, it is important to recognize that an overnight visitor spends approximately three times the amount that a day visitor spends. Therefore, this report emphasizes the attraction of overnight visitors rather than day visitors.

Major Findings and Recommendations

While tourism is big business in Syracuse and Central New York, there are some unique opportunities in the region to substantially develop the potential of tourism as an economic stimulus. The majority of the tourism negatives about the area are relatively easy to fix and the strengths already exist, waiting to be further developed for tourism.

There is a sense within many people in the Central New York region that there is significant untapped tourism potential and that the area has what it takes to become a greater tourism destination. We would agree that there is significant untapped tourism potential but it will require some meaningful commitment by both the public and private sectors within the region. In short, to develop the Central New York destination potential will require primarily

- additional attractions
- additional facilities to capture the visitor dollar, and
- additional funds to invite visitors.

Based on *only* the two largest proposed developments in this report (Carousel Center and the development of resorts), the projected direct economic impact of the tourism industry on the MDA region is expected to increase by approximately 54% in output by the stabilization year to reach over $778.45 million. Total impact of the industry on the region

including the direct impact is estimated to reach approximately $1.5 billion in output, $240.8 million in earnings and over 13,000 jobs.

Those major projects we have identified as having the greatest and most critical potential to stimulate economic development are bulleted with a ◆.

New Development

- The Carousel Center is the largest attraction in the region in terms of bringing in large numbers of visitors with attendance exceeding 10 million and an estimated overnight visitation of 1 million. The expansion of the Carousel Center, especially an expansion done with an eye toward attracting the tourism market has far and away the greatest economic potential for the region with a projected increase in overnight visitors of 800,000. Significant efforts to ensure this type of development should be made.

- The development of resorts would attract a market that is largely being ignored currently.

- The development of a ski town-type gateway community close to I-81 near an exit would capture revenue from the large numbers of outdoor recreation visitors currently going to Oswego County, as well as attract new visitors with new lodging, restaurants and evening activities. Such development would also capitalize on and expand the extensive winter recreation business in the Pulaski/Oswego area. The snowmobiling industry will need some additional attention and support to realize its significant potential.

- The New York State Canal System should be developed and marketed as the "canalling capital of the U. S." and a premier tourism magnet for upstate New York. The development of an extensive system of live-aboard canal boats for rent, as well as effective marketing to promote these canal boats, would increase the marketing effectiveness of the canal. Providing financial incentives for the development of canal boats could jump-start the development of this attraction for all of upstate New York. While the numbers of actual canallers would be small compared to visitors to the Carousel Center, the unique high profile, high positive image promoted in part by the existing U.S. network of 30,000 travel agents would contribute to increased visitation for "non-canallers."

- Develop the Erie Canalway Heritage Corridor as a state and/or federal project. As a federally designated heritage corridor, it would be very likely to stimulate broad interest from park enthusiasts both nationally and internationally. Promotion through the high profile National Park system would increase visitor attendance. See the second bullet under "Organizational Development" for further information on the development of this project as part of an upstate tourism economic development demonstration project.

- A major Visitors Interpretive Center located in proximity to Syracuse, the Inner Harbor, the canal boat "home port", the aquarium, the heritage corridor and the Carousel Center would be a critical mass of attractions drawing people to the area.

- The development of a new, modern convention center hotel physically connected to the OnCenter would reflect a sense of renewed spirit in downtown, provide needed first class convention hotel rooms within walking distance of the OnCenter and help the community attract more conventions with delegates from a greater distance. It may also stimulate an improvement in the existing overall accommodations product. We recommend that a convention hotel feasibility study be conducted for downtown Syracuse.

  While the OnCenter is an excellent convention facility, the majority of the events held there are strongly local. Local events are appropriately booked within the 18-month booking window per center policy and high economic impact convention business is not turned away in favor of local business. However, the ability of the Syracuse Convention & Visitors Bureau and the OnCenter to solicit non-local business is significantly hampered by a CVB budget that is non-competitive, a downtown hotel product that does not include a modern convention hotel and has limited number of commitable rooms within walking distance, and non-competitive air fares.

- The completion of the Inner Harbor project will provide an appealing waterfront element that attracts people. Easy access and clear signage between the Inner Harbor, Carousel Center and Downtown Syracuse would provide a sense of unity between the various key locations and facilitate movement of both visitors and residents. The completion of the Creekwalk project will provide an additional link as well as offering a unique recreation opportunity.

- Downtown will always be the "soul" of the Syracuse community with historic architecture, culture and entertainment with an ambiance that cannot be duplicated in modern construction. A more formal "Special Events Office" to provide expanded programming and a defined, signed and promoted "Arts & Entertainment District" will work to emphasize that unique ambiance and continue to create activities, businesses and psychological reasons to come downtown that give people something different than what they can get elsewhere. An appropriate level of resources will be necessary to achieve the desired level of downtown visitation.

- Attraction of a major airline with significantly lower fares would materially help attract more conventions with fly-in delegates who stay longer and spend more. It would also have a substantial impact on local business travel.

- With high numbers of business travelers, Syracuse must increase the satisfaction level of this market.

- The development of a rail link between tracks that are not now connected would make it possible to travel by rail from New York City into downtown Syracuse and beyond

into the Finger Lakes to Watkins Glen. The functional link into the key New York City market as well as the psychological link with the romance of rail travel, and the intermodal opportunities for motorcoach operators would provide Syracuse with a unique opportunity to attract more visitors.

- Beyond the Erie Canalway Heritage Corridor, there is significant cultural heritage in the area that can be developed, packaged and promoted to visitors such as the story of the Iroquois Confederacy, the ceramics industry, the visual and performing arts, and the architecture of Syracuse, etc. Some of this is currently being done but, with adequate funding, can be packaged and promoted for overnight visitation, can be told through new interpretive centers, and can be leveraged and promoted more effectively in cooperation with regional partners. Examples are listed in the report's Action Plan and can include such things as the development of an Artist's Colony in empty buildings and the high impact, high visibility of a "lights up" program to save the Syracuse architecture from the night.

Organizational Development

- There is broad community support for using tourism development to stimulate the local and regional economy. There is also a strong desire to have a forum in which to focus and initiate action on a number of tourism development initiatives. We recommend the formation of a regional tourism product development coalition, within an existing development oriented organization, to be composed of a broad base of community leaders interested in further developing tourism as part of the Central New York economic base. This coalition would allow a sharing of information, a point from which interested parties could find common interests and initiate "action teams" to further the development of specific projects.

  The proposed coalition could use this report as a point of departure to address as many of the suggested projects for which there is broad support

1) While the above regional tourism product development coalition provides the mechanism to encourage development at the community level, we recommend that a comprehensive "Tourism Development Program," administered under an existing agency, be established as an Upstate Tourism Economic Development Project. This would allow the communities to draw from recommendations in this report and directly implement the many positive possibilities toward strong economic development.

   The components of such a program would include:
   1) Designation and development of a Cultural Heritage Corridor – the Erie Canalway Heritage Corridor, including elements such as:
      a) Training of leaders from each community in cultural heritage tourism and product development
      b) Development of multi-disciplinary community action teams
      c) Administrative funds for coordination of the multi-jurisdictional corridor

d) Incorporation of the Heritage Corridor as an independent non-profit organization
e) Support for preparation of cultural heritage strategic tourism development plans
f) On-going technical support
g) Competitive grant programs for bricks and mortar product development
h) Competitive grant programs for marketing of the cultural heritage corridor
i) Commitments from appropriate state agencies
j) Economic development tracking mechanisms

2) Private sector development incentive project
   a) For new or expanded projects in excess of $1 million
   b) For new or expanded projects between $500,000 - $999,999
3) Tourism Development Revolving Loan Fund
   a) $1,000 - $250,000
4) Tourism Development Certificate Project
   a) To support community efforts to prepare for tourism development
5) Cultural Heritage Tourism Marketing Partnership Grants
   a) To support promotion of the Erie Canalway Heritage Corridor through matching grants

- By virtue of budget size, scope of services, and number of professional staff, the key destination marketing organization in Onondaga County is the Greater Syracuse Convention & Visitors Bureau (SCVB), a department of the Greater Syracuse Chamber of Commerce. The CVB needs additional organizational support in order to function optimally as a full destination management and marketing entity for Onondaga County.

- The SCVB is unable to maintain market share, expand its promotion into new and needed areas, and compete effectively with other cities because its budget, at $941,715 (1997), is significantly under funded in relation both to a) competitor city budgets and in relation to b) community desires to expand its economy through tourism.

- The primary focus of the Syracuse Convention & Visitors Bureau marketing efforts has been the convention market. This is the correct approach for an organization with a limited budget, an excellent convention center, and a community with a natural base from which to solicit special interest convention groups (i.e. education, agriculture, etc.) There is a strong community desire to do more sports marketing which is a natural for the community sports orientation and infrastructure and a plan is being implemented to develop this market. There is also a strong desire to develop the individual leisure traveler market. Without a significant increase in the Syracuse Convention & Visitors Bureau budget, it will be very difficult to make major inroads into this and other markets. It will also be very difficult if not impossible to maintain current tourism market share or be competitive with other New York cities in promotion. An increased SCVB budget of approximately $2.2 million will allow it to initiate a competitive marketing strategy in the leisure and motorcoach markets, retain and increase convention marketing efforts and begin development of a sports marketing program. This budget would put Syracuse at the average of its competitor cities budgets.

Within a competitive framework, the financial budget to "invite visitors" to Syracuse/Onondaga County reflects the degree to which the community wishes to use tourism as an economic development tool for itself.

Marketing

- Current Leisure Tourism Market to Onondaga County
    - 80% are 18-49 years
    - $52,500 household income (higher than national average of $47,200)
    - 50.9% college graduates
    - 43.6% managerial/professional
    - Primary leisure trip reasons:
        * Visiting friends and relatives - 53.4%
        * Special events - 24.3%
    - Primary Activities:
        * Site attractions - 21.6%
        * Cultural - 18.9%
    - Expenditures
        * $130.40 per person/per day (Business traveler to Onondaga County. NY less NYC average is $108)
        * $65.40 per person/per day (Leisure traveler to Onondaga County. NY less NYC average $64; national average $78.70)
    - Transportation
        * 77.5% leisure travelers arrive by car
        * 25.2% of business travelers arrive by air
    - Distance Traveled
        * 73.1% of leisure visitors to Onondaga County came from 250 miles or less
    - Length of Stay
        * 59% of leisure trips to Onondaga County were day trips
        * 2.9 nights average stay of leisure visitors to Onondaga County
    - Top Feeder Markets of leisure travelers to Onondaga County
        * New York - 48.1%
        * Pennsylvania - 5.9%
        * Massachusetts - 5.4%
        * Virginia - 5.2%
    - Top feeder markets for business travel to Onondaga County
        * New York - 62.5%
        * Massachusetts - 5.0%
        * Ohio - 4.9%
        * Pennsylvania - 3.5%

- Visitor Satisfaction and Image Perception
  - * Visitors to Syracuse perceive it to be easily accessible, offering good value, with high quality overnight accommodations.
  - * Few Syracuse visitors hold strong negative perceptions of the area.
  - * Area visitors have substantial travel experience and awareness of destinations throughout the northeast.
  - * Area visitors prefer a main destination with multiple activities nearby.

- New York State is divided into tourism regions, as are most states, for both administrative and marketing purposes. There has been lively debate within the community about the regional designation for Syracuse and Onondaga County. Its designation as part of the Finger Lakes tourism region with its "lakes and grapes" image has seemed to some to be inappropriate for an urban area, i.e. " the city is not 'lakes and grapes' therefore it should be in a different region." We strongly recommend that Syracuse/Onondaga County remain in, and take advantage of the Finger Lakes designation, while at the same time develop a unique image for itself.

  D.K. Shifflet research shows clearly that the Finger Lakes region garners highly significantly more visitors (22.2 million person trips, or 19.6%, of 113 million NY state person trips) than any surrounding region to which Onondaga County might join or could hope to garner by the creation of a new tourism region. Additionally, Onondaga County receives 35.6% of the total visitation to the Finger Lakes region and has a Finger Lake within Onondaga County. From a marketing perspective, it is a great advantage for Onondaga County to be perceived by the visitor as part of the Finger Lakes region; it is "benefit by association" and allows Syracuse to rightly claim the Finger Lakes experience as part of its promotional package. Onondaga County should participate more fully at the board, committee, and marketing tactic levels in partnership with the Finger Lakes Association for leisure and motorcoach promotions and take full advantage of the positive image of being part of the Finger Lakes region.

- Although participation in the Finger Lakes region is very effective from a tourism marketing effectiveness perspective, it is clear that Syracuse needs to develop a separate, more urban identity, just as Rochester has done (also in the Finger Lakes tourism region). Research conducted for this report indicate that Syracuse is perceived as an attractive destination with a diversity of things to do and had relatively low negative ratings compared to its competitor cities. At the same time its image was a functional one: good shopping, good value for the money, good accessibility. Determining image was based on analyzing Syracuse's tourism product, its ambiance, its goals, its competitors and competitor's images, the various audiences for a city image (leisure visitors, conventions, motorcoach travelers, business attraction efforts, residents). From this analysis, we recommend that Syracuse base its image on the concept of action/energy/movement....a fun city; a positive, appealing city with lots going on; a city on the move. This positions Syracuse very differently from its competitors; it is based on reality and is therefore believable, and is useful for many different audiences. It should be noted that this is an image concept not a slogan; it

needs to be developed by an advertising agency into a promotional campaign appropriate for different markets.

A lot of promotion in the area is "product driven", that is, based solely on geography: "come to attraction A, come to district B, visit town C, visit county D, come to region E". This is partly because tourism funding programs are geographic based and because it is natural for local people to focus on their own community/product. This can be effective depending on the market and the existing visitor perception of image such as "the Finger Lakes Region." However, research has shown that "customer driven" marketing based on the interests and emotions of the visitor is likely to be more effective. This requires that destinations become more collaborative, develop more and many partnerships, become more research driven (what do visitors want?) and be more flexible about their marketing programs. It's difficult to shift from being "product driven" to being "customer driven" but it is necessary to compete successfully.

Focus for New or Expanded Markets

- Individual Leisure Market
  Target: 25-55 years with annual household income of $50,000 + residing within 250 miles of Syracuse; couples and families looking for weekend getaways with interests in shopping, entertainment, sports events, festivals/craft fairs, parks, culture and historic sites.

- Group Tour Market
  Packaged itineraries including exclusive "extras", discounted rates, good service and possibly interested in intermodal options if the train connection is made.

- Meetings/Conventions/Trade Shows
  * Continued focus on SMERFS business (social, military, education, religious, fraternal and sports)
  * Small national business with a natural link to the area
  * Groups averaging >500 sleeping rooms not needed under one roof and utilizing <62,500 SF of exhibit space
  * Consumer shows and small corporate events during the 3rd quarter

- Secondary Markets
  International only in partnership with others

- Special Niches
  Sports, cultural heritage, adventure, romance/getaway

Exhibit B

PYRAMID MANAGEMENT GROUP, LLC

THE CLINTON EXCHANGE ▲ 4 CLINTON SQUARE
SYRACUSE, NEW YORK 13202-1078

TEL 315-422-7000
FAX 315-472-4035

MAY 9, 2019

Mayor Ben Walsh
City of Syracuse
203 City Hall
233 E. Washington St.
Syracuse, New York 13202-1473

Re: Interstate 81 Project

Dear Ben:

As we have previously communicated, I am reaching out to reiterate our concerns regarding the recently released Draft Environmental Impact Statement ("DEIS"). In particular, I want to once again share our concern that the Community Grid, as currently proposed, will harm Destiny USA and a number of other parties that are integral components of the Syracuse region.

Destiny USA is located on a former scrapyard that was home to over 100 oil tanks. The site suffers from many difficult conditions. However, its most important positive geographic attribute was and is its adjacency to an I-81 north-south artery that serves the Syracuse region, the entire Northeast United States and Canada. I can assure you that Pyramid would never have chosen to begin the Destiny USA project if there was any question that I-81 would continue to function in this manner.

To date, Pyramid has invested over $1.5 billion in Destiny USA and the Syracuse Lakefront Area. The project is now the 6th largest shopping center in the country because it is the Number 1 tourist destination in Syracuse and Onondaga County, attracting businesses and tourists from around the world. Directly and through our tenants we employ over 5,500 local residents who rely on the success of Destiny USA for work.

As part of the evaluation of the DEIS, it is our intent to undertake a complete review of the impacts of various I-81 alternatives for the Syracuse region, utilizing third party professionals as appropriate. In addition to the obvious issue of traffic, our review will include the long-term economic implications for the Syracuse region.

It is our strong belief that there should be alignment between local government and the long-term implications for the Syracuse region. In respect to Destiny USA and its PILOT bonds, that desired alignment is appropriately captured by Section 9 of the Master PILOT Agreement, which states, in pertinent part, that the City and SIDA are to take such actions that Pyramid, "may reasonably require to enhance the ability of Carousel Center, Expansion Owner, or other such Obligor to design, finance, construct, equip, maintain and operate the Project Facility as a major regional tourist attraction."

As noted above, we are in the process of evaluating the recently released DEIS with a view toward making sure that the final I-81 product is the best one possible. That process will be lengthy. I will continue to communicate directly to you and other government representatives while we pursue this process.

Sincerely,

PYRAMID MANAGEMENT GROUP, LLC

Stephen J. Congel
Chief Executive Officer

Cc: County Executive Ryan McMahon

Exhibit C

SYRACUSE, NEW YORK FACT SHEET – December 2020

CENTERSTATE
CORPORATION FOR ECONOMIC OPPORTUNITY

The City of Syracuse is located in Onondaga County in the geographic center of New York State. The counties of Onondaga, Madison, and Oswego make up the ***Syracuse Metropolitan Statistical Area (MSA)***.

CLIMATE

Four seasons, continental mean average temperature:

January	24.3 degrees
April	47.2 degrees
July	72.0 degrees
September	63.8 degrees
Annual average snowfall	127.26 in.
Growing season approx.	171 days
Annual rainfall	41.54 in.

PROXIMITY TO MARKET

Over 136 million people live within a 750 mile radius of Syracuse, including over 50 percent of the population of Canada and the United States.

Mileage to Major Cities:

Albany, NY	136	New York, NY	253
Baltimore, MD	299	Philadelphia, PA	255
Boston, MA	299	Rochester, NY	85
Buffalo, NY	147	Toronto, Ont.	248
Chicago, IL	665	Washington, DC	350
Montreal, Que.	248		

POPULATION

	2000	2010
City of Syracuse	146,435	145,170
Onondaga County	458,336	467,026
Syracuse MSA	650,154	662,577

Source: U.S. Census Bureau

DEMOGRAPHICS

	City of Syracuse	Onondaga County	Syracuse MSA
Black/African American	35.4	11.6	10.7
White (not Hispanic)	56.3	78.6	86.1
Asian	8.0	3.8	3.6
Hispanic (any race)	9.6	5.2	4.4

Source: U.S. Census Bureau, 2019 American Community Survey 1-year estimates

MEDIAN AGE

	Median Age
City of Syracuse	32.2
Onondaga County	39.4
Syracuse MSA	39.8

Source: U.S. Census Bureau, 2019 American Community Survey 1-year estimates

MEDIAN HOME PRICE (December 2020)

	Median Price	'19-'20 % Change
Greater Syracuse	$159,745	+7.3
New York State	$350,000	+22.4

Source: Greater Syracuse Association of Realtors; New York State Association of REALTORS®

INCOME (2019)

	Median Family Income	Mean Family Income
City of Syracuse	$49,282	$69,717
Onondaga County	$84,681	$106,090
Syracuse MSA	$81,983	$101,873

Source: U.S. Census Bureau, 2019 American Community Survey 1-year estimates

REGIONAL OUTPUT (2019)

	GDP (Millions)	'18-'19 % Change
Albany	$56,461	+2.4
Buffalo	$63,026	+3.2
Rochester	$56,728	+2.4
Syracuse	$37,721	+2.7

Source: U.S. Bureau of Economic Analysis, Real GDP (chained 2012 dollars)

UNEMPLOYMENT RATE (%)

	Dec. 2010	Dec. 2020
City of Syracuse	9.7	9.8
Onondaga County	7.8	6.4
Syracuse MSA	8.5	6.4

Source: New York State Department of Labor, Local Area Unemployment Statistics, not seasonally adjusted

LABOR FORCE

	Dec. 2010 (Thousands)	Dec. 2020 (Thousands)
City of Syracuse	62.2	56.7
Onondaga County	233.1	209.9
Syracuse MSA	326.6	290.6

Source: New York State Department of Labor, Local Area Unemployment Statistics, not seasonally adjusted

EMPLOYMENT – SYRACUSE MSA

(Data in Thousands)

Industry	Dec. 2019	Dec. 2020	% change
Total (Nonfarm)	**325.0**	**290.4**	**-10.6**
Natural Resources, Mining & Construction	12.9	11.8	-8.5
Manufacturing	26.1	23.8	-8.8
Trade Transportation & Utilities	61.7	54.1	-12.3
Information	4.4	4.3	-2.3
Financial Activities	14.4	13.7	-4.9
Professional & Business Services	36.8	31.6	-14.1
Education & Health Services	67.8	61.5	-9.3
Leisure and Hospitality	28.5	22.5	-21.1
Other Services	12.0	10.7	-10.8
Government	60.4	56.4	-6.6

Source: New York State Department of Labor, Current Employment Statistics, Dec. 2020

MAJOR EMPLOYERS IN CENTRAL NEW YORK (2019)

Cornell University	8,514
SUNY Upstate Medical University	7,523
St. Joseph's Health	4,824
Oneida Indian National Enterprise	4,750
Syracuse University	4,683
Walmart	4,600
Mohawk Valley Health System	4,200
Lockheed Martin Mission Systems and Training	4,100
Price Chopper Supermarkets	3,900
Crouse Health	3,200
Tops Friendly Markets	3,170
National Grid	2,500
Loretto	2,307
The Raymond Corporation	1,900
Target Corp	1,755
Ithaca College	1,700
KPH Healthcare Services, Inc. (Kinney Drugs)	1,632
Wegman's Food Markets, Inc.	1,561
SUNY Oswego	1,320
BorgWarner Morse Systems	1,300
Excellus BlueCross BlueSheid	1,238
Cayuga Medical Center	1,210
Novelis	1,150
Tessy Plastics Corporation	1,000
SRC, Inc.	1,000
Chobani	1,000
Hillrom	1,000

Source: CNY Business Journal News Network 2021 Book of Lists

EMPLOYMENT CENTERS – Estimated total employment for areas of the County that serve as geographic clusters of employment.

- Downtown Syracuse..... 29,000
- University Hill 21,000
- Destiny USA 5,000
- Electronics Park.....2,000

COMMUNICATIONS

Major newspaper:

The Post-Standard (daily)	470-0011

Business newspapers:

Business Journal (weekly)	472-3104
Eagle Newspapers (weekly)	434-8889
Syracuse New Times (weekly)	422-7011

TRANSPORTATION

Syracuse is located at the crossroads of two interstate highway systems, east/west I-90 the New York State Thruway, and north/south I-81.

Air: Syracuse Hancock International Airport is the primary gateway for air service across the Central New York region. Hancock Airport is served by seven major airlines that transport more than two million passengers to and from Central New York, each year. With 120+ daily flights, Hancock Airport serves 24 non-stop destinations to major national and international gateway hubs. Six major air cargo companies service the Syracuse terminal in addition to several regional carriers, forwarders and passenger airlines that offer air freight services.

Highway: More than 150 trucking companies, including the nation's top 12 carriers of general freight, service the Syracuse area.

Bus: CENTRO provides public transportation for Syracuse and suburbs at a fare of $2.00. Onondaga Coach, Greyhound, Syracuse & Oswego, and Adirondack Trailways also provide inter-city passenger service.

Rail: The Finger Lakes Railway main route runs from Syracuse to Canandaigua, a distance of 76 miles. At Syracuse, the FGLK interchanges with CSX Transportation and New York, Susquehanna and Western Railway, which provide direct rail freight service to a variety of Northeastern markets. Amtrak provides rail passenger transportation service from the William F. Walsh Regional Transportation Center.

Water: The Port of Oswego is located on the southeast shore of Lake Ontario, 34 miles northwest of Syracuse. The New York State Canal System encompasses 524 miles and runs east-west across New York State, connecting the Niagara River with the Hudson River. The Onondaga Lake Barge Canal Terminal is located just north of Syracuse.

HEALTH CARE

Syracuse is home to numerous hospitals and specialized medical facilities, a number of long-term skilled nursing facilities, outpatient centers serving all sectors of the county, renowned teaching facilities, including Upstate University Health System, two hospital-based nursing schools, and several residency programs.

EDUCATION AND TRAINING

Public, Private and Parochial Education: There are 18 school districts in Onondaga County (17 Suburban, 1 City) with an enrollment of approximately 68,197 students. The districts are comprised of 78 Elementary Schools, 27 Junior High, and 21 High Schools. In addition, there are 23 accredited private and parochial schools and 2 charter schools in the greater Syracuse area.

College and Universities: There are 85 colleges and universities within a 100 mile radius of Syracuse, with a combined total enrollment of over 250,000 students. More than 20% of these students attend school at one of the 13 schools in the Syracuse MSA. Regional colleges and universities include:

- Syracuse University
- Clarkson University
- Cornell University
- St Joseph's College of Nursing at St Joseph's Hospital Health Center
- Pomeroy College of Nursing at Crouse Hospital
- SUNY College of Environmental Science and Forestry
- Upstate Medical University
- Le Moyne College
- Cayuga Community College
- Onondaga Community College
- Bryant & Stratton College-Syracuse and Syracuse North
- Cazenovia College
- Morrisville State College
- SUNY College at Oswego
- Colgate University

Vocational Training: The five public vocational centers and 24 private vocational and technical schools offer more than 80 courses of study in a wide variety of fields.

Prepared by: CenterState CEO. For additional information or more detailed data, contact: 315.470.1800

Exhibit D

NYSDOT AADT 1995 - 2014

ACTUAL NYSDOT AADT - I-81 between Adams Street and I-690

year	beginning traffic volume	growth rate	increment	ending traffic volume	average experienced growth rate
1995	63,600	6.099%	3,879	67,479	
1996		6.099%	4,115	71,594	
1997		6.099%	4,366	75,236	6.099%
1998	75,236	1.915%	1,441	76,677	
1999		1.915%	1,468	78,145	
2000		1.915%	1,496	79,558	1.915%
2001	79,558	2.406%	1,914	81,472	
2002		2.406%	1,960	83,432	
2003		2.406%	2,007	85,300	2.406%
2004	85,300	1.435%	1,224	86,524	
2005		1.435%	1,242	87,766	
2006		1.435%	1,260	89,026	
2007		1.435%	1,278	90,304	
2008		1.435%	1,296	91,600	
2009		1.435%	1,315	92,915	
2010		1.435%	1,334	94,248	
2011		1.435%	1,353	95,601	
2012		1.435%	1,372	96,973	
2013		1.435%	1,392	96,319	1.435%
2014	96,319				2.708%

2.7076% annual growth, 1995-2014

[roughly 2.7 percent per year]

51.44% overall growth, 1995-2014

1

* source: NYSDOT AADT data 1995-2014

Exhibit E

Future No Build Year Traffic Volumes

The No Build condition represents the future without the I-81 Viaduct Project. No Build traffic volumes represent a future-year growth scenario that includes all planned/committed highway and transit improvements, except the I-81 Viaduct Project alternatives. Two future No Build years were analyzed, including the Project's Estimated Time of Completion (ETC) year 2026 and design year 2056 (ETC+30). The primary tool used for forecasting future No Build year traffic volumes is the SMTC regional travel demand model. The SMTC model predicts traffic volumes as a result of the anticipated changes in land use, population, economic activity, and the transportation system. A discussion of planned developments in the Project Area is located in **Section 6-2-1.2.5, Planned Developments**. AM and PM peak hour traffic volumes were forecasted separately for the 2026 and 2056 No Build conditions.

Detailed AM and PM peak hour No Build traffic volumes for all interstate segments, ramp connections, and intersections for the 2026 and 2056 analysis years are located in **Appendix C-3**. **Table 5-7** shows the weekday AM and PM peak hour traffic volumes for key segments on the interstate freeways and several local roadways in the project area.

Table 5-7
2026 and 2056 No Build Traffic Volumes at Key Locations

Location	Direction	AM			PM		
		Existing	No Build		Existing	No Build	
		2013	2026	2056	2013	2026	2056
I-81 Just North of Colvin Street Interchange	NB	2,871	3,032	3,412	2,937	2,957	3,101
	SB	2,292	2,357	2,480	3,394	3,519	3,815
I-81 Just South of Court/ Spencer Street Interchange	NB	2,464	2,484	2,688	5,787	5,945	6,322
	SB	5,062	5,254	5,681	3,425	3,529	3,820
I-481 Just South of I-690 Interchange	NB	3,310	3,492	3,722	2,657	2,784	2,958
	SB	1,904	2,030	2,203	3,430	3,565	3,814
I-481 Just North of I-690 Interchange	NB	2,135	2,304	2,551	2,902	3,025	3,267
	SB	2,602	2,740	3,083	2,329	2,459	2,797
I-690 Just West of West Street Interchange	EB	4,193	4,512	4,893	2,331	2,545	2,801
	WB	1,835	1,974	2,178	3,790	4,024	4,386
I-690 Just East of Teall Avenue Interchange	EB	3,480	3,560	3,711	4,649	4,795	4,965
	WB	3,949	3,977	4,271	4,057	3,937	4,061
West Street Just South of Fayette Street	NB	510	495	438	795	833	782
	SB	1,053	1,022	1,082	721	655	698
Clinton Street Just North of Onondaga Street	NB			196			265
	SB	531	546	424	424	483	327
Salina Street Just North of Onondaga Street	NB	377	318	282	498	419	437
	SB	396	362	440	339	283	370

Exhibit F

NYSDOT AADT 1995 - 2014

ACTUAL NYSDOT AADT - I-81 between Adams Street and I-690

year	beginning traffic volume	growth rate	increment	ending traffic volume	average experienced growth rate
1995	63,600	6.099%	3,879	67,479	
1996		6.099%	4,115	71,594	
1997		6.099%	4,366	75,236	6.099%
1998	75,236	1.915%	1,441	76,677	
1999		1.915%	1,468	78,145	
2000		1.915%	1,496	79,558	1.915%
2001	79,558	2.406%	1,914	81,472	
2002		2.406%	1,960	83,432	
2003		2.406%	2,007	85,300	2.406%
2004	85,300	1.435%	1,224	86,524	
2005		1.435%	1,242	87,766	
2006		1.435%	1,260	89,026	
2007		1.435%	1,278	90,304	
2008		1.435%	1,296	91,600	
2009		1.435%	1,315	92,915	
2010		1.435%	1,334	94,248	
2011		1.435%	1,353	95,601	
2012		1.435%	1,372	96,973	
2013		1.435%	1,392	96,319	1.435%
2014	96,319				2.708%

2.7076% annual growth, 1995-2014

[roughly 2.7 percent per year]

51.44% overall growth, 1995-2014

1

* source: NYSDOT AADT data 1995-2014

I-81 July 2021 DEIS - **PM Peak Hour** traffic between Adams Street and I-690

NO-BUILD - projected traffic growth

interim volumes calculated from DOT estimated 2026 and 2056 volumes

year	beginning traffic volume	growth rate	increment	ending traffic volume	total growth over period
2026	9,474	0.220%	21	9,495	
2027	9,495	0.220%	21	9,516	
2028	9,516	0.220%	21	9,537	
2029	9,537	0.220%	21	9,558	
2030	9,558	0.220%	21	9,579	
2031	9,579	0.220%	21	9,600	
2032	9,600	0.220%	21	9,621	
2033	9,621	0.220%	21	9,642	
2034	9,642	0.220%	21	9,663	
2035	9,663	0.220%	21	9,685	
2036	9,685	0.220%	21	9,706	
2037	9,706	0.220%	21	9,727	
2038	9,727	0.220%	21	9,749	
2039	9,749	0.220%	21	9,770	
2040	9,770	0.220%	21	9,792	
2041	9,792	0.220%	22	9,813	
2042	9,813	0.220%	22	9,835	
2043	9,835	0.220%	22	9,856	
2044	9,856	0.220%	22	9,878	
2045	9,878	0.220%	22	9,900	
2046	9,900	0.220%	22	9,921	
2047	9,921	0.220%	22	9,943	
2048	9,943	0.220%	22	9,965	
2049	9,965	0.220%	22	9,987	
2050	9,987	0.220%	22	10,009	
2051	10,009	0.220%	22	10,031	
2052	10,031	0.220%	22	10,053	
2053	10,053	0.220%	22	10,075	
2054	10,075	0.220%	22	10,097	
2055	10,097	0.220%	22	10,120	
2056	10,120				646

0.2272% annual growth, 2026-2056

[roughly 2/10's of one percent per year]

6.81% overall growth, 2026-2056

* source: NYSDOT July 2021 Draft EIS

I-81 July 2021 DEIS - **PM Peak Hour** traffic between Adams Street and I-690

"WHAT IF" - NO BUILD - projected traffic growth

initial volume established from NYSDOT July 2021 DEIS estimated 2026 volume

year	beginning traffic volume	growth rate	increment	ending traffic volume	total growth over period
2026	9,474	2.708%	257	9,731	
2027	9,731	2.708%	263	9,994	
2028	9,994	2.708%	271	10,265	
2029	10,265	2.708%	278	10,543	
2030	10,543	2.708%	285	10,828	
2031	10,828	2.708%	293	11,121	
2032	11,121	2.708%	301	11,422	
2033	11,422	2.708%	309	11,732	
2034	11,732	2.708%	318	12,049	
2035	12,049	2.708%	326	12,375	
2036	12,375	2.708%	335	12,711	
2037	12,711	2.708%	344	13,055	
2038	13,055	2.708%	353	13,408	
2039	13,408	2.708%	363	13,771	
2040	13,771	2.708%	373	14,144	
2041	14,144	2.708%	383	14,527	
2042	14,527	2.708%	393	14,920	
2043	14,920	2.708%	404	15,324	
2044	15,324	2.708%	415	15,739	
2045	15,739	2.708%	426	16,165	
2046	16,165	2.708%	438	16,603	
2047	16,603	2.708%	450	17,053	
2048	17,053	2.708%	462	17,514	
2049	17,514	2.708%	474	17,989	
2050	17,989	2.708%	487	18,476	
2051	18,476	2.708%	500	18,976	
2052	18,976	2.708%	514	19,490	
2053	19,490	2.708%	528	20,017	
2054	20,017	2.708%	542	20,559	
2055	20,559	2.708%	557	21,116	
2056	21,116				11,642

2.7076% annual growth, 2026-2056

[roughly 2.7 percent per year]

122.89% overall growth, 2026-2056

* source: NYSDOT July 2021 Draft EIS

Exhibit G

BEFORE

INTERSTATE I-81 TODAY

2026 PEAK PM HOUR TRAFFIC VOLUMES

Source: NYS DOT July 2021 DEIS

AFTER

IF COMMUNITY GRID PLAN WERE ADOPTED

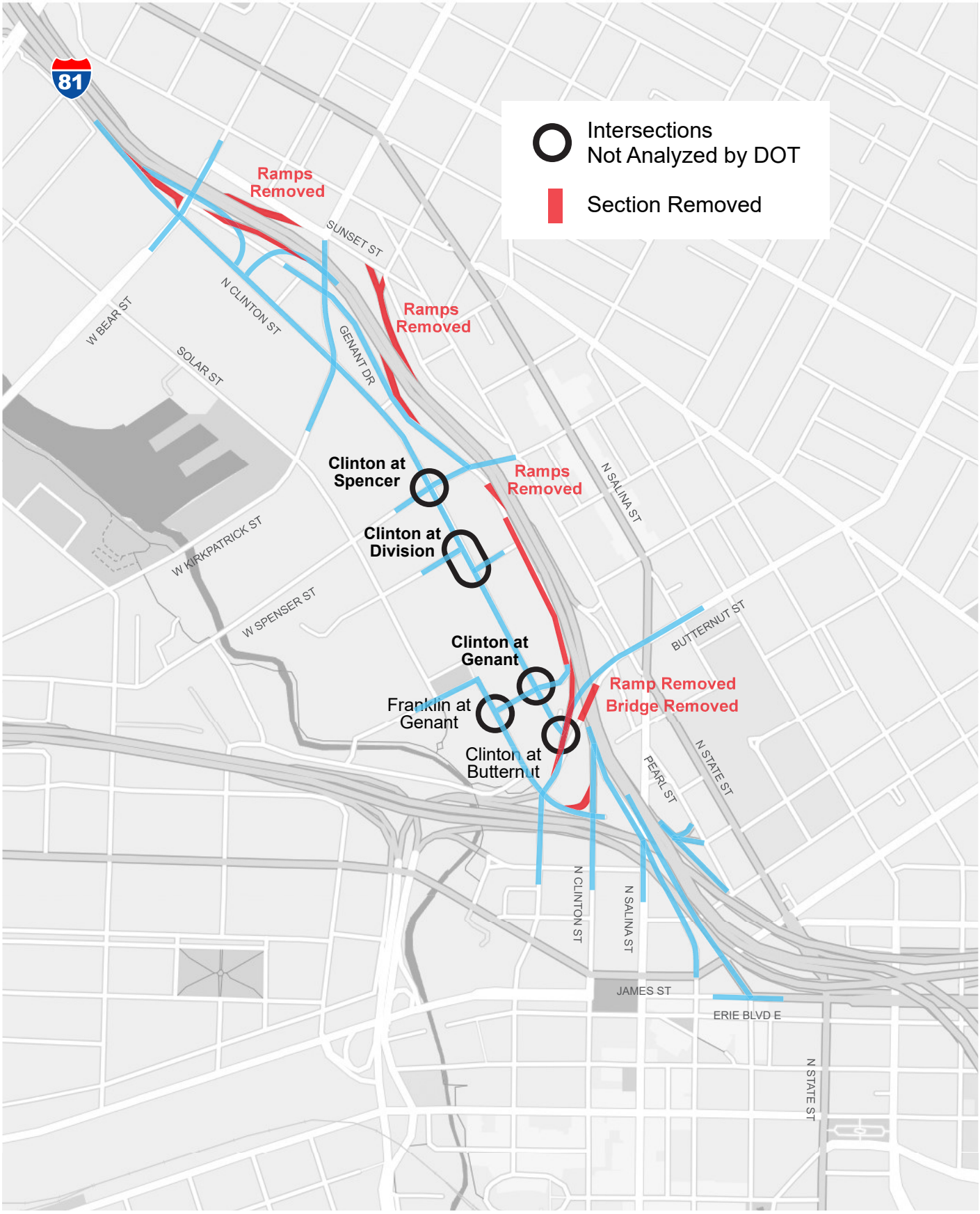
2026 PEAK PM HOUR TRAFFIC VOLUMES

Source: NYS DOT July 2021 DEIS

Exhibit H

INTERSECTIONS NOT ANALYZED BY NYS DOT

SIGNIFICANT CHANGES ARE PLANNED FOR FRANKLIN SQUARE SECTION OF I-81, YET NO ANALYSIS WAS DONE ON THE SURROUNDING INTERSECTIONS.



number of non-home-based, non-motorized productions that were removed. However the SMTC model does not explicitly remove a set number of home-based, non-motorized attractions from each TAZ, but implicitly controls for these trips by balancing attractions to productions (see section 6.7).

6.5 Special Generators

Special generators are TAZs with unique characteristics and whose trip making is best represented with a custom model. The special generator designation is typically given to land uses that attract or produce an unusually high number of trips, or are characterized by an unusually flat or steep trip distribution (see 8.2), such as airports, which attract auto trips by passengers from near and far, and universities, which predominantly attract short, walk trips by students living on or close to campus.

Attractions to the 16 special generator TAZs (Figure 13) were developed using ITE trip generation rates in conjunction with data collected by the SMTC from the principal employers in each special generator. In most cases, the total attractions to each special generator were calculated by multiplying the amount of a key variable, such as the number of beds in a hospital, into an ITE formula specifically designed for that key variable. The key variable is either a proxy (e.g. the number of square feet in a mall) or related to the actual reason (e.g. the number of students in a university) for why each business attracts trips. The specific key variable selected for each special generator was based both on what data the SMTC could collect from specific employers and what variables the ITE has developed attraction rates for.

For two of the special generators, the normal technique for estimating trip attractions (as described in Section 6.2) of multiplying the number of employees categorized by SIC code by the ITE based rates shown in Table 24 was used. This approach was used where the custom ITE trip generation rate approach did not yield reasonable results. Three of the special generators were not modeled because they attract trips at only infrequent/irregular intervals and are unlikely to impact traffic on a typical weekday. For instance, the Carrier Dome is not modeled because it attracts a significant number of trips only when it hosts events. Table 26 presents the type of calculation ("type"), which indicates whether the special generator is modeled by a key variable or based on employment by SIC code; if there is a key variable, then the table presents that variable ("key variable"), the key variable amount ("VAR Amount"), and the corresponding formula ("Trip End Formula"); finally, the table presents the resulting number of total attractions ("Attractions").

The SIC employment data were used to allocate special generator attractions among the four trip purposes. First, the standard technique, as described in Section 6.2, of estimating trip attractions from SIC data was used to calculate total attractions by trip purpose. Then, these shares were multiplied into the total trip ends presented into Table 26. Finally, the resulting trip purpose splits were adjusted using judgment.

For special generators containing households, home-based productions were estimated using the same methodology as employed for internal TAZs (see Section 6.2). Non-home based productions were set equal to the number of non-home based attractions.

As described in Section 6.4, a fixed percentage of non-motorized productions were removed from each of the special generators (see Table 27), based on the non-motorized percentages developed for their related Census block group(s). A number of NHB attractions were then immediately removed equal to the number of NHB productions removed.

With two exceptions, all home-based attractions to each special generator were assumed to be motorized. Accounting for the small share of non-motorized attractions to these specials generators would have demanded more data collection and added more complexity to the model. For instance, accounting for the very small number of trips that walk to Hancock Airport would have added unnecessary complexity to the model. However, it would have been unreasonable to assume 100% motorized attractions to Syracuse University and to the Syracuse Hospitals. Therefore, an effort was made, in the absence of detailed mode choice data, to estimate a share of non-motorized attractions to these special generators. Section 8.2 describes in detail how a percentage of non-motorized attractions were estimated for these two special generators.

Figure 13: Special Generators

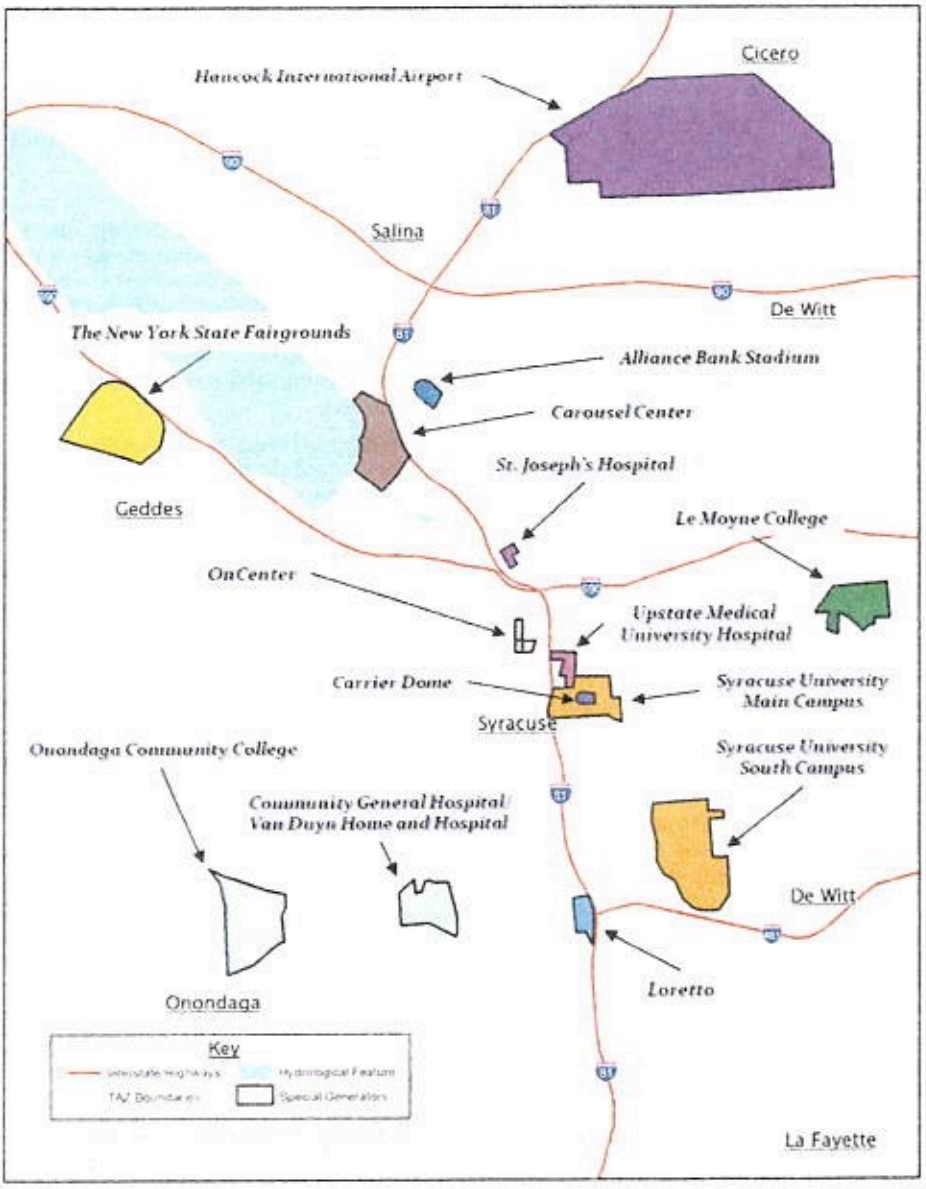


Table 26: Total Attractions by Special Generator

TAZ	Name	Type	Key Variable	VAR Amount	Trip End Formula	Attractions
8001	NY State Fairgrounds	Not Modeled	-	-	-	-
8002	Carousel Center	Key Variable	000s sq ft	1,500	2.718^(0.65*LN(VAR)+5.83)	39,438
8003	Onondaga Community College	Key Variable	Students	8,979	2.718^(0.89*LN(VAR)+1.24)	11,389
8004	Van Duyn Home & Hospital	Key Variable	Beds	882	-	5,591
	Van Duyn Home	-	Beds	526	(2.3*VAR) +6.07	-
	Community General Hospital	-	Beds	356	(7.42*VAR)+1733.31	-
8005	Loretto	Key Variable	Beds	820	(2.3*VAR)+6.07	1,892
8006	SU South Campus	SIC Based	-	-	-	2,891
8007	OnCenter	Key Variable	-	-	Trip Ends * Share of Attractions	23
8008	OnCenter	Key Variable	-	-	Trip Ends * Share of Attractions	17,506
8009	OnCenter	Key Variable	-	-	Trip Ends * Share of Attractions	3,453
	OnCenter	-	Employees	2,615	7.75*VAR	-
	OnCenter	-	Employees	80	3.32*VAR	-
	OnCenter	-	Visitors	225	2*VAR	-
8010	Lemoyne College	Key Variable	Students	3,309	(2.23*VAR)+440	7,819
8011	University Hill Hospitals	SIC Based	-	-	-	40,703
8012	Syracuse University	Key Variable	Students	18,767	(2.23*VAR)+440	42,291
8013	Carrier Dome	Not Modeled	-	-	-	-
8014	St. Joe's Hospital	Key Variable	Beds	431	(7.42*VAR)+1733.31	4,931
8015	P & C Stadium	Not Modeled	-	-	-	-
8016	Hancock Airport	Key Variable	Employees	1,300	18.1*VAR	23,530

Table 27: Special Generator Non-Motorized Productions and Attractions

TAZ	Special Generator	Productions	Attractions*
8001	NY State Fairgrounds	0.0%	0.0%
8002	Carousel Center	0.0%	0.0%
8003	Onondaga Community College	0.0%	0.0%
8004	Van Duyn Home & Hospital	0.0%	0.0%
8005	Loretto	3.0%	0.0%
8006	SU South Campus	3.0%	0.0%
8007	OnCenter	20.0%	0.0%
8008	OnCenter	20.0%	0.0%
8009	OnCenter	20.0%	0.0%
8010	Lemoyne College	2.5%	0.0%
8011	University Hill Hospitals	15.0%	27.1%
8012	Syracuse University	15.0%	100.0%
8013	Carrier Dome	15.0%	0.0%
8014	St. Joe's Hospital	15.0%	0.0%
8015	P & C Stadium	0.0%	0.0%
8016	Hancock Airport	4.0%	0.0%

* Only applied to TAZs in same ZIP Code to represent non-motorized accessible TAZs

Table 28 summarizes the motorized trip productions and attractions in the special generator TAZs.

Table 28: Special Generator Productions and Attractions

TAZ	Special Generator	Productions	Attractions
8001	NY State Fairgrounds	(SE)	(SE)
8002	Carousel Center	9,995	29,444
8003	Onondaga Community College	3,836	7,553
8004	Van Duyn Home & Hospital	541	4,342
8005	Loretto	604	1,814
8006	SU South Campus	5,188	2,862
8007	OnCenter	5	15
8008	OnCenter	2,283	14,081
8009	OnCenter	778	2,286
8010	Lemoyne College	5,593	5,018
8011	University Hill Hospitals	14,337	38,054
8012	Syracuse University	7,354	20,304
8013	Carrier Dome	(SE)	(SE)
8014	St. Joe's Hospital	268	4,888
8015	Alliance Bank Stadium	(SE)	(SE)
8016	Hancock Airport	5,073	18,034

(SE): Special Event locations that are not included in a model run that represents a typical day

Exhibit J

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

Triphammer Properties, Ltd
4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 2615 Lodi St, 111 Bear St & Lodi St, 2717 Lodi St & Wolf St, and 2711 Lodi St to Oswego Blvd. A portion of these properties has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

NYSDOT will conduct two (2) Public Hearings to discuss the proposed improvements. One (1) Public Hearing will be virtual, and one (1) will be in-person.

The Public Hearing Dates, Times, and Locations are:

1. **Virtual Public Hearing** - Tuesday, August 17th, a pre-recorded presentation, shown at 11:00 AM and 5:00 PM, will be followed by oral comments.
   a. To Live-stream the hearing, without submitting oral comments, visit https://www.dot.ny.gov/i81opportunities and click the link provided to YouTube.
   b. To submit oral comments and join the hearing via Zoom, go to the project website (https://www.dot.ny.gov/i81opportunities) and register using the link provided.
   c. To register to submit oral comments by telephone only, please call the project hotline (855) I81-TALK (855-481-8255).

2. **In-Person Public Hearing** - Wednesday, August 18th the Oncenter (800 State St, Syracuse, NY 13202) – Door open at 3:30 PM.
   a. A pre-recorded presentation, shown at 4:00 PM and 6:00 PM, will be followed by oral comments.

b. These in-person presentations can also be viewed remotely. To Live-stream, without submitting oral comments, visit https://www.dot.ny.gov/i81opportunities and click the link provided to YouTube.

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Also attached is an information pamphlet on the State's Acquisition Process. Feel free to contact me at (315) 448-7322 or Robert.Rugg@dot.ny.gov with any questions or concerns.

Sincerely,

Robert W. Rugg

Robert W. Rugg
Regional Real Estate Officer

Enc.

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

JPD Corp.
4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 901 Clinton St N & Court St W. A portion of this property has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

NYSDOT will conduct two (2) Public Hearings to discuss the proposed improvements. One (1) Public Hearing will be virtual, and one (1) will be in-person.

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

Sunnydale Corporation
Pyramid Co of Onondaga 4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 931 Clinton St N & Court St W. A portion of this property has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

Dembo Development Associates, LLC
4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 998 Clinton St. N. and 1000 Clinton St. N. to Oswego Blvd. A portion of these properties has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

Emerald Point Inc
Pyramid Co of Onondaga 4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 967 Clinton St N to Solar St. A portion of this property has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

Bruce Kenan
Pyramid Co of Onondaga 4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 967 Clinton St N to Solar St and 931 Clinton St N & Court St W. A portion of these properties has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

Destiny USA Land Co LLC
4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 300 Bear St W & Solar St, 200 Bear St W, 250 Bear St W & Solar St, 540 Solar St, 550 Solar St, 301 Bear St W. to Solar St, 470 Solar St to N Clinton St, and 245 Bear St W. & Solar St. A portion of these properties has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

Destiny USA Real Estate, LLC
4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 311 Hiawatha Blvd. W. & Solar St and 301 Hiawatha Blvd. W. Rear. A portion of these properties has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

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NEW YORK STATE OF OPPORTUNITY. | Department of Transportation

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Governor

MARIE THERESE DOMINGUEZ
Commissioner

DAVID P. SMITH, P.E.
Regional Director

July 19, 2021

Pyramid Company of Onondaga
4 Clinton Sq
Syracuse, NY 13202

Re: Interstate 81 (I-81) Viaduct Project
Notice of Public Hearing
Notice of Availability of DEIS

Dear Property Owner:

The New York State Department of Transportation (NYSDOT) has identified you as the property owner of 400 Bear St W & Van Rensselaer. A portion of this property has been identified as a potential acquisition based on preliminary design of the Department's I-81 viaduct Project. The Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) have been made available at local libraries, community centers, and other locations which can be found on the project website. The DDR/DEIS can also be accessed or downloaded by visiting the project website: https://www.dot.ny.gov/i81opportunities.

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Sincerely,

Robert W. Rugg

Robert W. Rugg
Regional Real Estate Officer

Enc.

Exhibit K

destiny usa

October 14, 2021

Mark Frechette, P.E.
Project Director
NYS Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

RE: I-81 Draft Environmental Impact Statement ("DEIS")

Dear Mr. Frechette and Mr. Marquis:

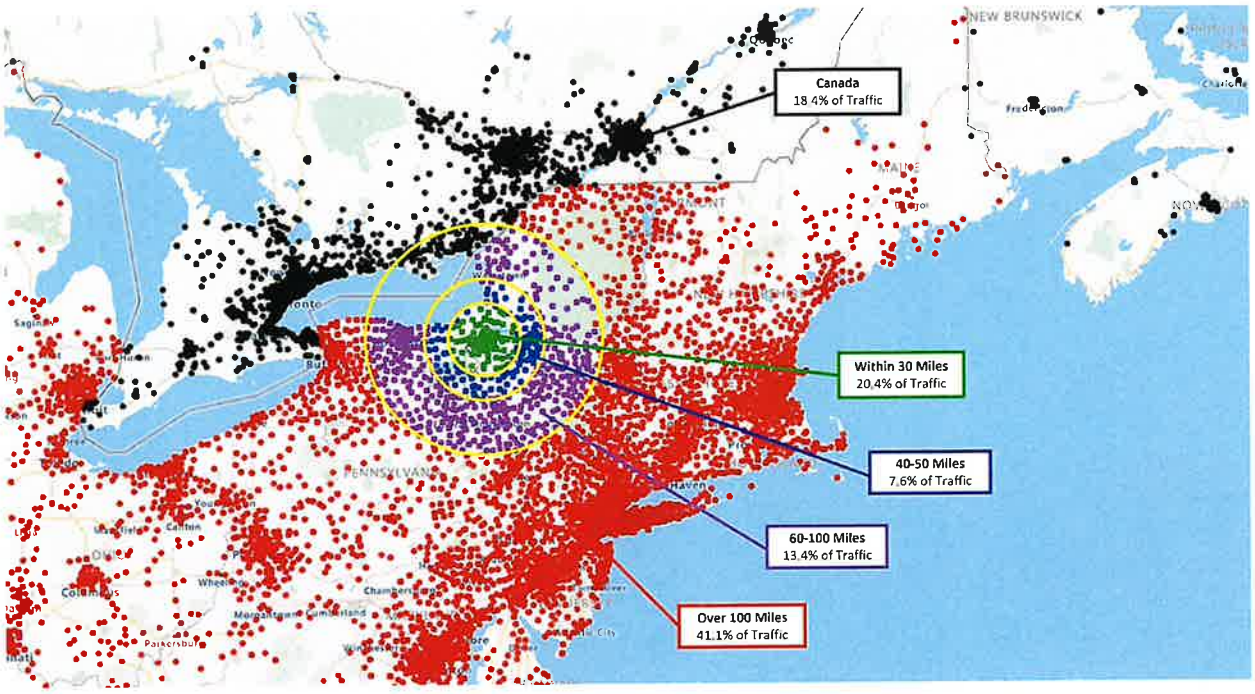
My name is Robert Schoeneck and I am the General Manager at Destiny USA, the largest shopping, dining, and entertainment venue in New York State. I am writing regarding the New York State Department of Transportation ("NYSDOT) DEIS report, specifically "SECTION 6-3-2 LOCAL AND REGIONAL ECONOMIES," in which the NYSDOT's projects the economic impact of rerouting Interstate 81 traffic around to the east of Syracuse via the Community Grid Alternative.

My concerns are as follows:

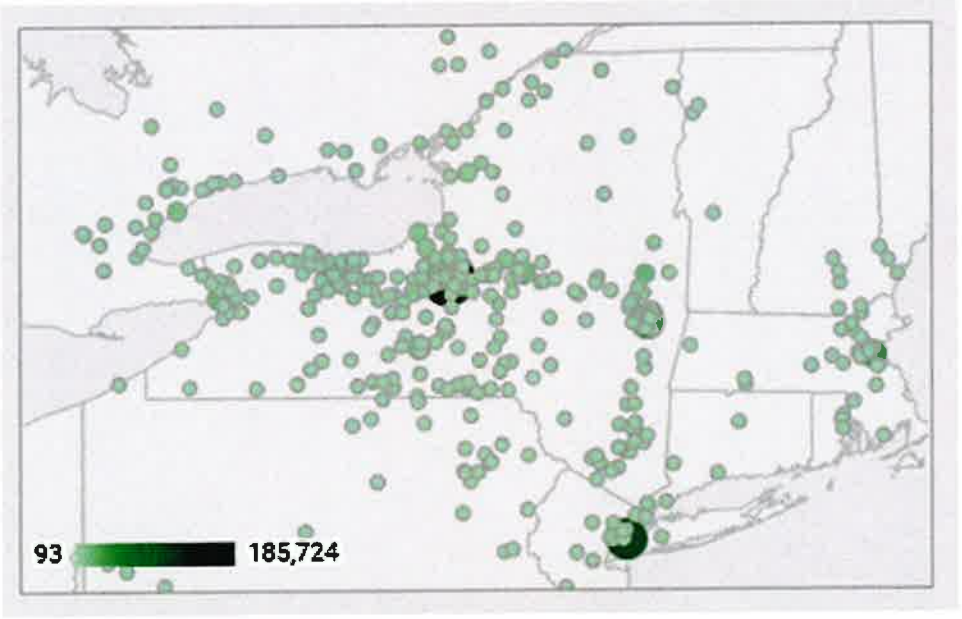
While we received the DEIS report when it was released in July 2021, neither we, nor any of our 260 tenants at Destiny USA were asked to provide information or input, or consulted in any way. We, along with our tenants, understand our business in depth and closely track where our guests are traveling from across a wide spectrum of avenues using tenant sales data and tracking tools such as Placer.ai.

Here are five different sources of data (all from the pre-COVID 2019 timeframe) that clearly demonstrate the bulk of our visitors coming to Destiny USA travel from long distances and a very large share of which rely on Interstate 81 for convenient access – something that is significantly underestimated in the NYSDOT report.

Zip Codes Collected from Destiny USA Guests Who Used Destiny USA's Free on-site WiFi Jan. 1 – Dec. 31, 2019:

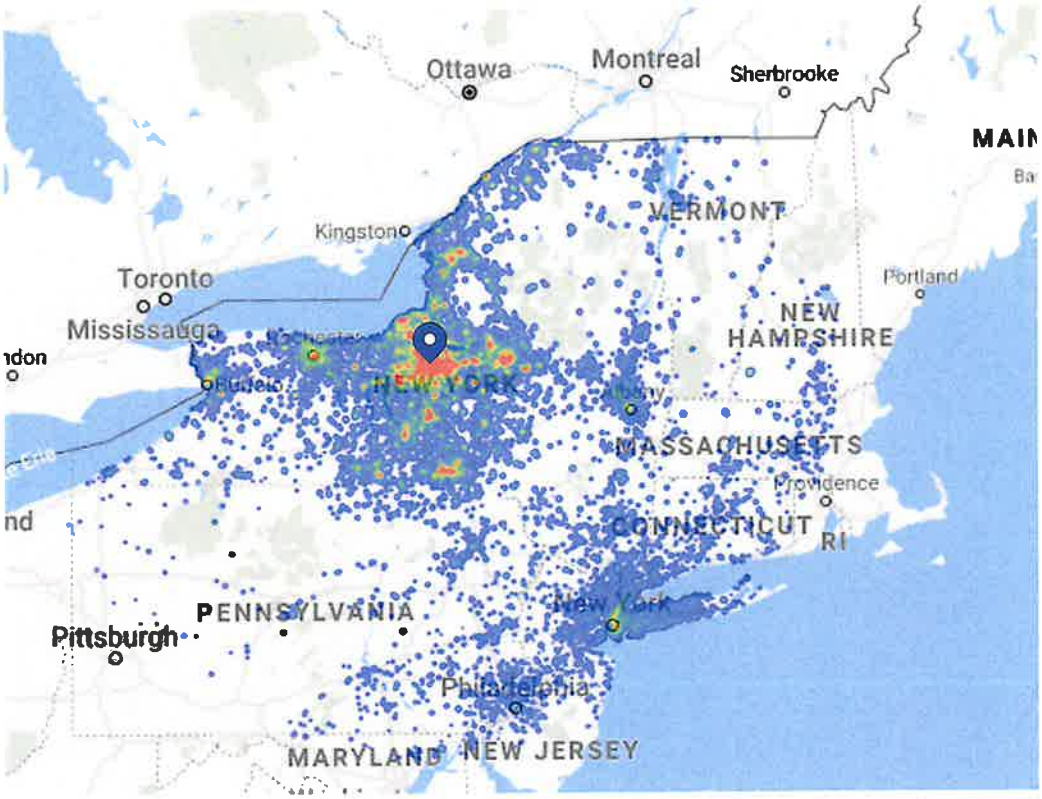


Google Analytics Analysis of DestinyUSA.com's Users Home Locations Conducted for Destiny USA from Jan. 1 – Dec. 31, 2019

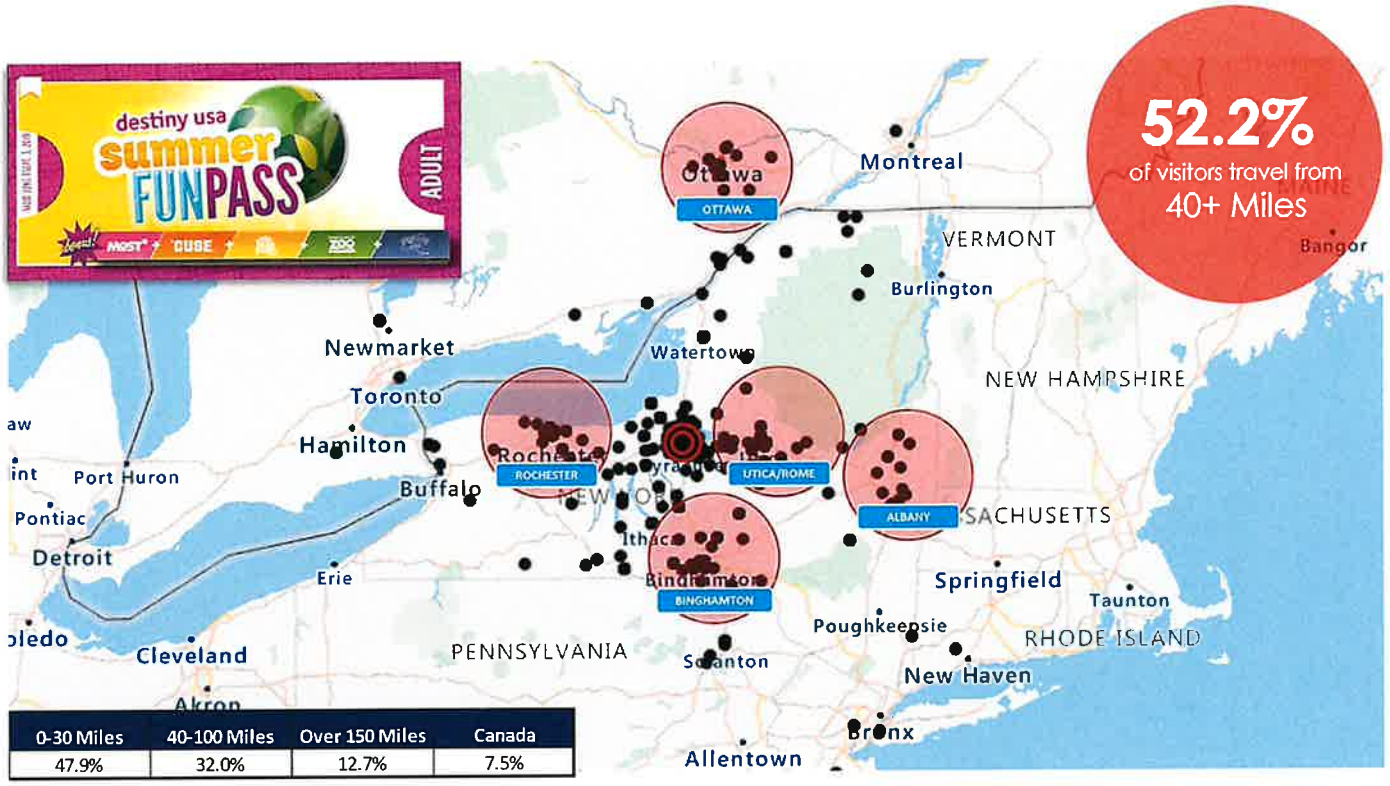


TOP 25 CITIES	
Syracuse	17.69%
New York	10.18%
Albany	5.13%
Boston	2.87%
Chicago	2.76%
Ottawa	1.94%
North Syracuse	1.79%
Fairmount	1.62%
Buffalo	1.59%
Manlius	1.53%
Utica	1.50%
Ithaca	1.49%
Saratoga Springs	1.48%
Baldwinsville	1.27%
Rochester	1.03%
Toronto	1.02%
Cicero	0.98%
Colonie	0.97%
Binghamton	0.85%
Auburn	0.85%
Liverpool	0.83%
Oswego	0.82%
East Syracuse	0.81%
Montreal	0.80%
Troy	0.74%

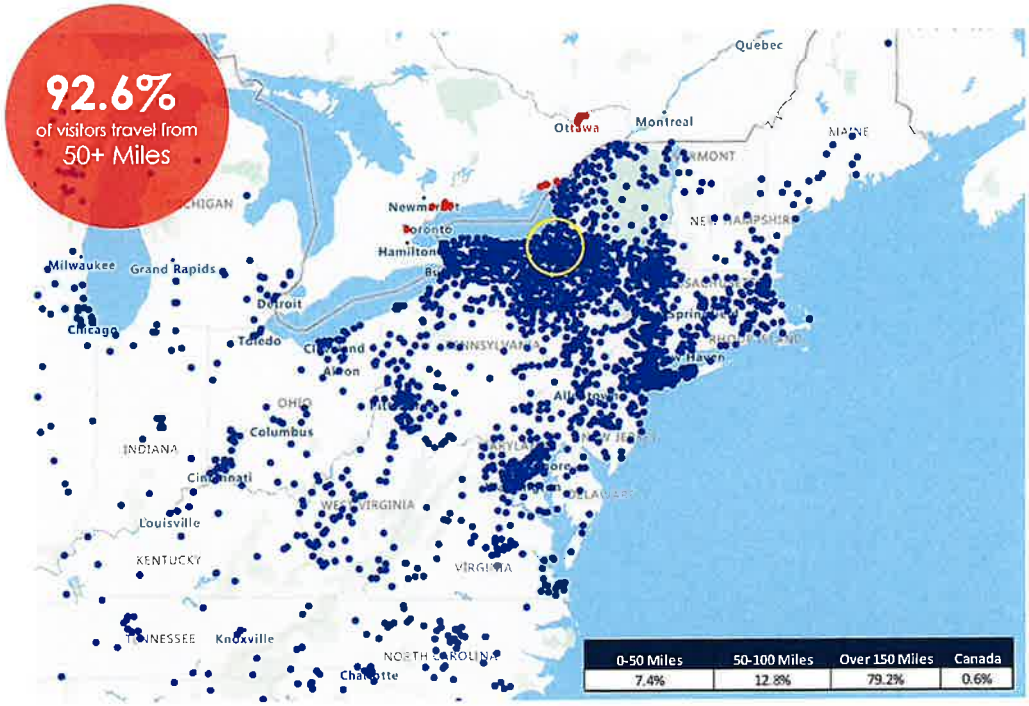
Placer.ai Heat Map Showing the Home Location of the Mobile Devices of Destiny USA Visitors. (2019; Placer.ai is the industry leader in accurate, reliable, accessible and compliant location analytics. Placer.ai analyzes shopping patterns using location data from 30 million devices; Placer.ai does not track Canadian devices)



Zip Codes Codes of Destiny USA Summer Fun Pass Purchasers. (Sold June – September, 2019)

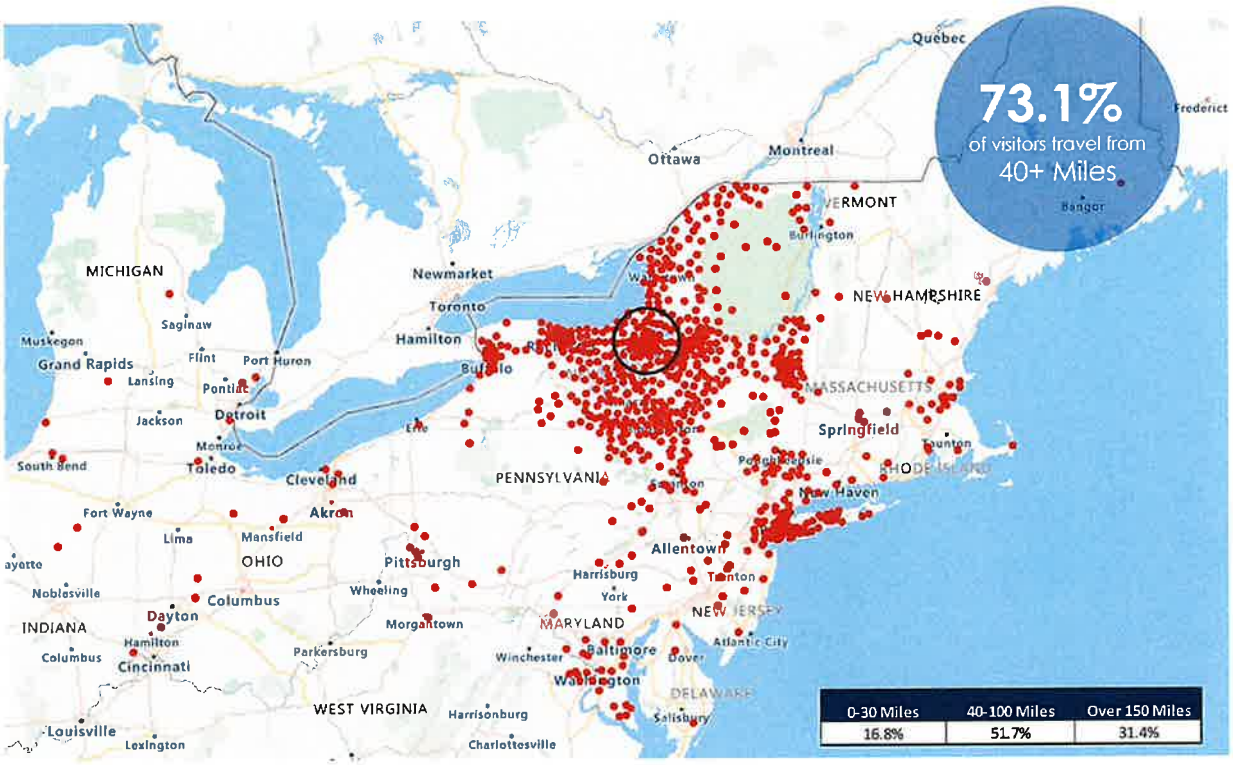


Entertainment Tenant #1 Zip Codes Collected from Guests Who Purchased Admission Tickets in 2019



Destiny USA ▪ 9090 Destiny USA Dr ▪ Syracuse NY 13204
Tel: (315) 422-7000 ▪ Fax: (315) 422-2485 ▪ www.destinyusa.com

Entertainment Tenant #2 Zip Codes Collected from Guests Who Purchased Admission Tickets in 2019 (tenant did not collect Canadian zip codes)

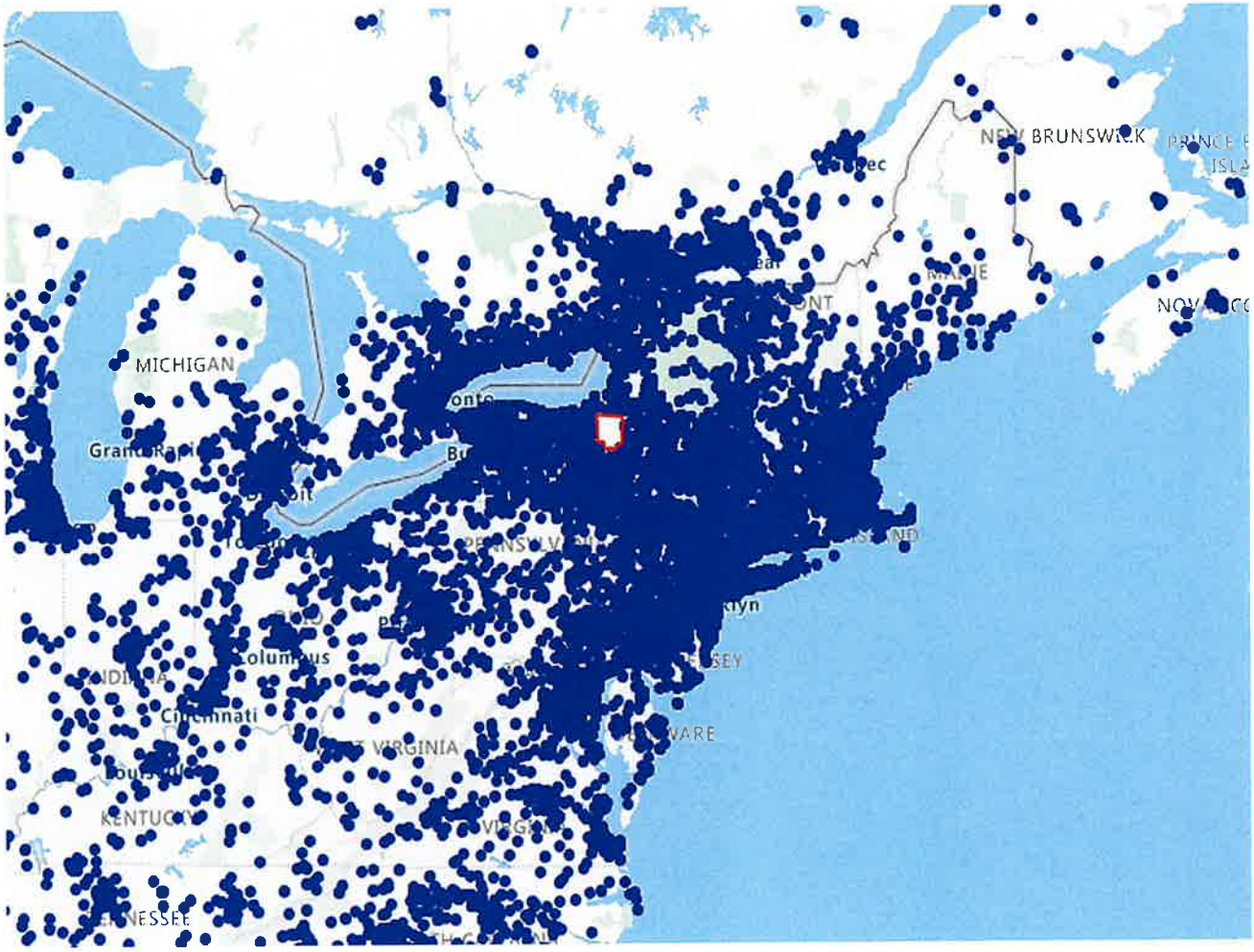


Based on what we and our tenants know about where our guests come from and through independent analysis by Placer.ai, it is clear the DEIS analysis was fundamentally flawed.

Consider the following:

1. NYSDOT's estimated 69.1% of Destiny USA's visitors come from inside Onondaga County and more specifically within the I-481 corridor; yet our multiple data sources show that, in fact, **over 60% of our guests are coming from outside of Onondaga County**.

Zip Codes Collected from Destiny USA Guests Who Used Destiny USA's Free on-site WiFi Jan. 1 – Dec. 31, 2019: (Zoomed out to show breadth of visitors traveling from outside of Onondaga County, outlined in red).



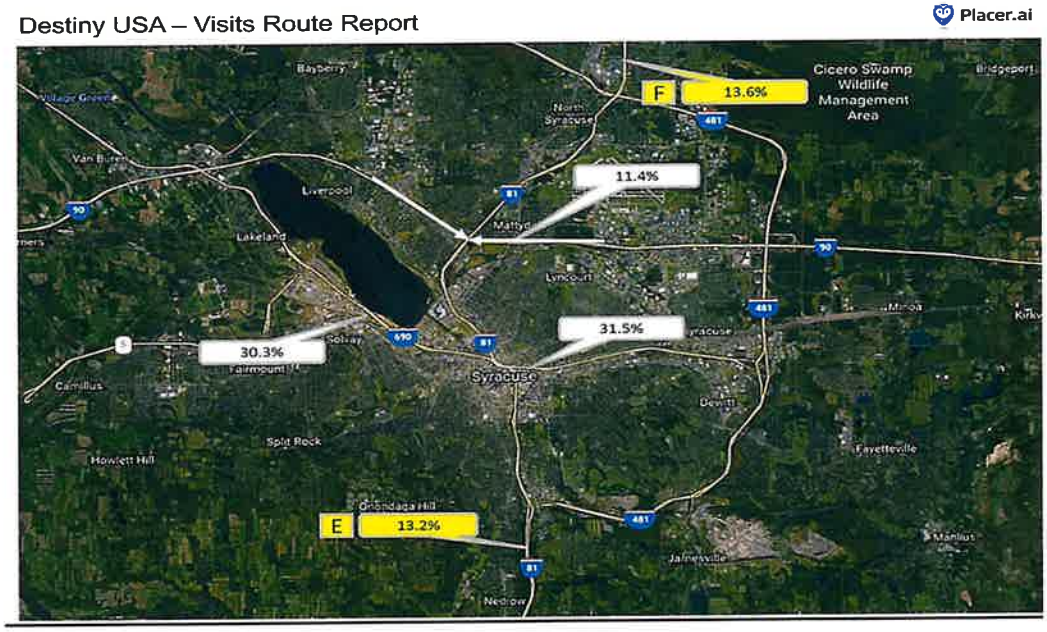
2. The NYSDOT DEIS projects only 8.3% of day trips to Destiny USA from I-81 South of I-481 and I-81 North of I-481 (See A, B and C in chart Below). Independent analysis from Placer.ai determines that of major highway access routes to Destiny USA, 26.8% of visits are from I-81 South of I-481 and I-81 North of I-481 (13.2% [See E Below] and 13.6% [See F Below], respectively).
3. Based on the NYSDOT's flawed approach, its "total reduction in customers" (See D Below) could not be accurate and significantly underestimates the total impact of decommissioning this important section of Interstate 81.

Chart from DEIS; Section 6-3-2 LOCAL AND REGIONAL ECONOMIES

Percent of All Daily Trips Destined to Zones 1, 2, and 3

	Gate #	Description	Zone 1 Hotels	Zone 2 Destiny USA	Zone 3 Pilot Travel Center
A	3	I-81 South of I-481	10.7%	3.9%	4.2%
B	13	I-81 North of I-481	14.5%	4.4%	3.9%
	22	I-690 West of Hiawatha Blvd	12.9%	9.7%	4.1%
	24	I-690 East of I-81	18.6%	9.1%	2.7%
	27	I-90 West of I-81	23.8%	1.0%	5.3%
	28	I-90 East of I-81	19.5%	2.8%	8.5%
		Other (including I-81 between north and south I-481 interchanges)		69.1%	71.2%
		Total	**100.0%**	**100.0%**	**100.0%**
C		From I-81 (Outside 481)	25.2%	8.3%	8.1%
		% Pass-By Trip Capture	5.3%*	34.0%**	66.0%***
D		Total Reduction in Customers (CG)	1.3%	2.8%	5.3%

Placer.ai Independent Analysis Showing Customer Journey Routes to Destiny USA Between Jan. 1 – Dec. 31, 2018 Highlighting Percentages of Traffic (Visits) to Destiny USA via the Major Highways Surrounding Destiny USA



4. *For five decades, Pyramid has been developing shopping centers and other complex properties, choosing locations like Destiny USA specifically for their superior highway access and visibility.*

   By design and of utmost importance to the 260 businesses and 5,000+ employees that work the property, Destiny USA is conveniently located in the center of New York State adjacent to Interstate 81, less than 10-minutes from Syracuse Hancock International Airport and the New York State Thruway. Syracuse is within a 350-mile radius of every major city in the Northeast and includes a population of more than 75 million people. Major target markets within this area include Eastern Canada, regional tourists, university students and all regional residents. The existing complex of major roadways make Syracuse and Destiny USA a prime overnight location for guests traveling between New York City to Niagara Falls and Canada.

   As a major regional attraction, the overwhelming majority of Destiny USA's visitors reach the property through some combination of highway access, with I-81 being the predominate route guests take from the north and south.

   The proposed traffic diversion around Destiny USA to Interstate 481 would negatively impact accessibility, visibility and visitation to Destiny USA.

5. Destiny USA has worked closely with the New York State Tourism and Visit Syracuse organizations to attract out of town visitors including Canadians and International tourists.

   Working in collaboration with New York State, I Love NY and Visit Syracuse, Destiny USA has made tremendous strides in driving the local and State tourism economy. As the top tourist attraction in all of Central New York and the largest shopping, dining and entertainment destination in all of New York State, Destiny USA welcomes millions of visitors from across the globe on an annual basis and has made significant investments in bringing in people from further distances for longer lengths of stay. These efforts include:

   - ***The Central New York Welcome Center Inside Destiny USA***: in 2017, we and New York State announced the grand opening of the Central New York Welcome Center inside Destiny USA, the first of its kind built inside an attraction in New York State. The Welcome Center, one of 11 throughout the state, advances the State's commitment to continue growing the state's tourism industry by promoting local attractions, food and beverage producers, and the region's agritourism destinations. The Welcome Center serves as a great portal for the region and allows guests to get a flavor of all things New York State, including the robust offering of Destiny USA while on their journey.

I Love NY's Central New York Welcome Center In Destiny USA

- ***Our First On-Site Hotel***: In September of 2017, Destiny USA and Embassy Suites by Hilton, a global brand of upscale, all-suite hotels from Hilton, celebrated the opening of the new onsite 209-room Embassy Suites by Hilton Syracuse—Destiny USA. Hotel construction began in June 2016, and it is the first onsite at Destiny USA, features an onsite restaurant and pool and is the go-to property for guests traveling to visit the Destiny USA international travel and tourist destination.

  The hotel welcomed guests from all 50 states and 70 countries within the first two years of being open and serves as the official hotel of Syracuse Athletics and the Syracuse Mets. The hotel caters especially to traveling Canadians, who visit to shop, dine, play and stay at Destiny USA.

Destiny USA Embassy Suites Hotel

- ***A Magnet for Canadian Shoppers***: Canadian shoppers account for 18.4% of shoppers at Destiny USA. With 60% of the Canadian population residing directly across the New York State border, Destiny USA has seen tremendous Canadian traffic over the years, with retailers often accepting Canadian currency and always many Canadian tour buses and license plates found in the parking lot.

  Destiny USA actively caters to the Canadian market with unique promotions and giveaways, including a market-first "at par" stay and play package which included discounted hotel accommodations and Fun Pass at Destiny USA.

Destiny USA + Hotel Co-Branded Canadian Promotion Targeted at Canadians

- ***Motorcoach Group Visitation:*** Since the expansion of Carousel Center and rebranding of Destiny USA in 2012, significant resources have been dedicated to promote the property through domestic and international trade shows and marketing. Results continue to be impressive, bringing substantial additional spending into the Central New York area. Every year, representatives of Destiny USA attend numerous trade shows, sales missions, summits and conferences with the goal of strengthening relationships with established colleagues and introducing the product and area to new operators throughout the world with the goal of encouraging future visitation from both emerging and mature markets.

Destiny USA is an economic catalyst and engine for the City of Syracuse, Onondaga County and Central New York. Destiny USA's direct economic impact can be summarized as follows:

- ***Total Annual Sales Impact***
  - $550,000,000
- ***Annual Sales Tax***
  - $38,560,885 (NYS sales tax, state and county)
    - State: $19,280,443
    - County: $12,917,897
    - Syracuse City & Towns: $6,362,546

There are countless reasons why Interstate 81 should be maintained in its present corridor. This submission speaks solely to the flaws of I-81 DEIS Section 6-3-2 LOCAL AND REGIONAL ECONOMIES.

Sincerely,

Robert J. Schoeneck
General Manager

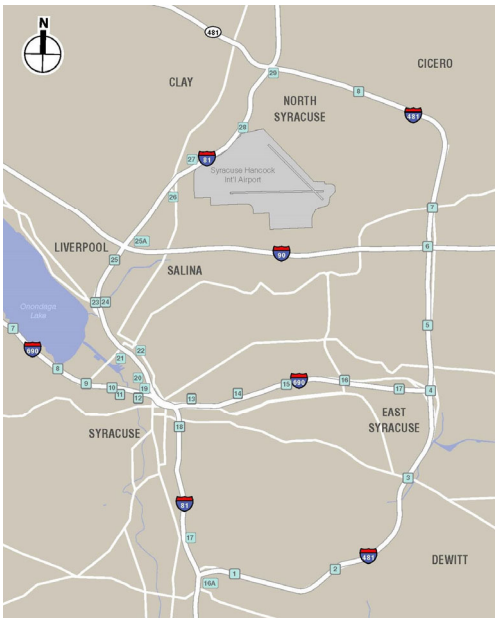
Economic Analysis - Hotels Along 7th North Street

September 13, 2021

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

- Introduction I-81 Project team staff.
- The economic analysis performed assesses the potential benefits and adverse effects on the local and regional economies. DOT did not analyze the effects of the projects related to each individual business in the region. Additional evaluation of economic impacts on certain industries/location, including the hotels in the 7th North Street area.
- The DEIS and associated Economic Analysis is a draft document so if you have information that you believe is pertinent to this analysis.
- Today is about sharing information related to the economic analysis performed. We will drive down into the analysis as it relates to Seventh North Street and focus only on the hotels.

Map of CNY – Economic Analysis



1. Current Traffic Volumes

2. Proposed Construction & Timeframes

3. Future Traffic Volumes Under Community Grid

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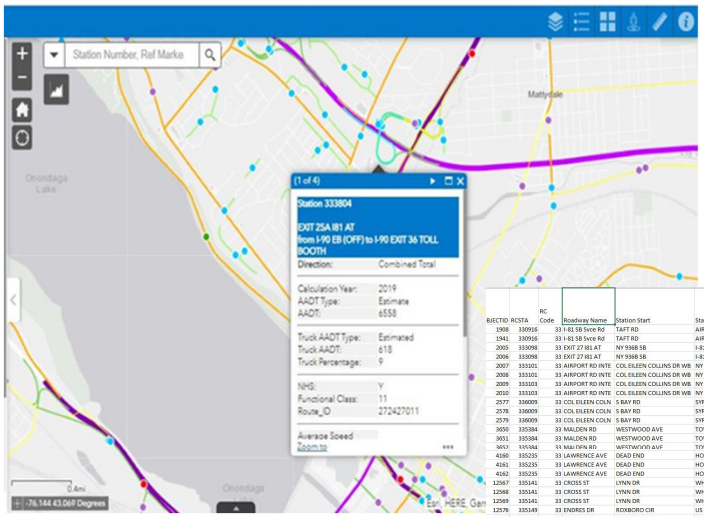
Three scenarios were considered related to the economic analysis – existing conditions, conditions during construction of the project, and conditions after the project is built.

First – DOT understands that traffic volume is a key metric for businesses that rely on pass-by traffic, to varying degrees. Businesses want to be near high traffic volumes.

Second - A project of this nature will require a substantial workforce for construction and related jobs. DOT is currently looking at a 20% local level hiring goal for this $1.9 Billion project from within Onondaga County. That means up to 80% of the workforce could come from outside Onondaga County. I want to talk about where this is happening, construction phases starting in 2022 -2028 and the workforce necessary to build this project.

Third - What are the projected traffic volumes after the Community Grid is built and how does that affect the I-81 conversion to BL81, and more specifically, the traffic volumes at 7th North Street.

Traffic Volume - Existing Conditions



BJECTID	RCSTA	RC Code	Roadway Name	Station Start	Station End	Functional Class	Factor Group	Specific Recorder Placement	Channel Notes	Vehicle Axle Code	Count Year	Count Month	Day of First Data	Direction	Federal Count	Full Count	1200am-0100am	1100pm-1200pm	Average Weekday Daily Traffic
1908	330916	33	I-81 SB Svce Rd	TAFT RD	AIRPORT BLVD	19	30	403 yds S of E Taft Rd.	SB travel lane	1	2015	11	10	Southbound			52	43	5274
1941	330916	33	I-81 SB Svce Rd	TAFT RD	AIRPORT BLVD	19	30	403 yds S of E Taft Rd.		1	2015	11	10	CombineY			52	43	5274
2005	330098	33	EXIT 27 I81 AT	NY 936B SB	I-81 SB (ON)	11	30	186 yards north of I81 SB ra	SB travel lane	2	2015	11	10	Southbound			128	169	6024
2006	330098	33	EXIT 27 I81 AT	NY 936B SB	I-81 SB (ON)	11	30	186 yards north of I81 SB ra		2	2015	11	10	CombineY			128	169	6024
2007	333101	33	AIRPORT RD INTE	COL EILEEN COLLINS DR WB	NY 936A NB	16	30	126 yards west of 936A EB N	NB travel lane	2	2015	11	10	Northbound			64	109	1846
2008	333101	33	AIRPORT RD INTE	COL EILEEN COLLINS DR WB	NY 936A NB	16	30	126 yards west of 936A EB Ma		2	2015	11	10	CombineY			64	109	1846
2009	333103	33	AIRPORT RD INTE	COL EILEEN COLLINS DR WB	NY 936B SBRamp Ends	16	30	61 yards north of 936B WB	SB travel lane	2	2015	11	10	Southbound			105	157	2557
2010	333103	33	AIRPORT RD INTE	COL EILEEN COLLINS DR WB	NY 936B SBRamp Ends	16	30	61 yards north of 936B WB		2	2015	11	10	CombineY			105	157	2557
2577	336009	33	COL EILEEN COLN	S BAY RD	SYRACUSE AIRPORT	16	30	43 Yds E of I81 OVER	EB travel lane	1	2015	11	10	Eastbound			24	50	3010
2578	336009	33	COL EILEEN COLN	S BAY RD	SYRACUSE AIRPORT	16	30	43 Yds E of I81 OVER	WB passing lan	1	2015	11	10	Westbound			142	212	4130
2579	336009	33	COL EILEEN COLN	S BAY RD	SYRACUSE AIRPORT	16	30	43 Yds E of I81 OVER		1	2015	11	10	CombineY			166	262	7140
3650	335384	33	MALDEN RD	WESTWOOD AVE	TOWNLINE RD	19	30	1,893 Ft E of Westwood Av		1	2015	7	27	Eastbound			13	14	2635
3651	335384	33	MALDEN RD	WESTWOOD AVE	TOWNLINE RD	19	30	1,893 Ft E of Westwood Av		1	2015	7	27	Westbound			24	36	4077
3652	335384	33	MALDEN RD	WESTWOOD AVE	TOWNLINE RD	19	30	1,893 Ft E of Westwood Av		1	2015	7	27	CombineY			37	50	6712
4160	335235	33	LAWRENCE AVE	DEAD END	HOYTVILLE AVE	19	30	57 Ft W of Hoytville Ave		1	2015	7	25	Eastbound			0	1	73
4161	335235	33	LAWRENCE AVE	DEAD END	HOYTVILLE AVE	19	30	57 Ft W of Hoytville Ave		1	2015	7	25	Westbound			0	1	61
4162	335235	33	LAWRENCE AVE	DEAD END	HOYTVILLE AVE	19	30	57 Ft W of Hoytville Ave		1	2015	7	25	CombineY			0	2	134
12567	335141	33	CROSS ST	LYNN DR	WHITMORE RD	19	30	79 Ft W of Legion Dr		1	2015	7	25	Eastbound			0	0	26
12568	335141	33	CROSS ST	LYNN DR	WHITMORE RD	19	30	79 Ft W of Legion Dr		1	2015	7	25	Westbound			0	0	32
12569	335141	33	CROSS ST	LYNN DR	WHITMORE RD	19	30	79 Ft W of Legion Dr		1	2015	7	25	CombineY			0	0	58
12576	335149	33	ENDRES DR	ROXBORO CIR	US 11	19	30	466 Ft W of RT 11		0 1	2015	7	26	Eastbound			15	27	850
12577	335149	33	ENDRES DR	ROXBORO CIR	US 11	19	30	466 Ft W of RT 11		0 1	2015	7	26	Westbound			8	14	477
12578	335149	33	ENDRES DR	ROXBORO CIR	US 11	19	30	466 Ft W of RT 11		1	2015	7	26	CombineY			23	41	1127
12650	335161	33	MARILYN AVE	BAILEY RD	CLAY LINE	19	30	85 Ft N of Holly Rd		1	2015	7	25	Northbound			4	2	291
12651	335161	33	MARILYN AVE	BAILEY RD	CLAY LINE	19	30	85 Ft N of Holly Rd		1	2015	7	25	Southbound			4	3	275
12652	335161	33	MARILYN AVE	BAILEY RD	CLAY LINE	19	30	85 Ft N of Holly Rd		1	2015	7	25	CombineY			8	5	566
12653	335162	33	NEEDLES LA	N CONCOURSE	END	19	30	123 Ft S of Vickery Rd		1	2015	7	25	Northbound			0	0	294
12654	335162	33	NEEDLES LA	N CONCOURSE	END	19	30	123 Ft S of Vickery Rd		1	2015	7	25	Southbound			0	0	295
12655	335162	33	NEEDLES LA	N CONCOURSE	END	19	30	123 Ft S of Vickery Rd		1	2015	7	25	CombineY			0	0	589
16352	330914	33	I-81 NB Svce Rd	COL. EILEEN COLLINS BLVD	JCT EAST TAFT RD	19	30	.57 Mi S of E Taft Rd	NB Travel and p	2	2015	4	21	Northbound			158	196	12133
16353	330914	33	I-81 NB Svce Rd	COL. EILEEN COLLINS BLVD	JCT EAST TAFT RD	19	30	.57 Mi S of E Taft Rd		2	2015	4	21	CombineY			158	196	12133
23077	333093	33	EXIT 26 I81 AT	I-81 NB (OFF)	ACC BREWERTON RD	11	30	197 Yds S of Brewerton Rd	NB Travel and p	2	2015	10	14	Northbound			104	170	10525

- Start by explaining how DOT collects our Traffic Volume Data. Numerous mechanisms exist.

- A comprehensive traffic data collection effort was undertaken for the project, and that data was periodically validated overs the years using various other data sources.

- Traffic Data Viewer is located on DOT's webpage at https://www.dot.ny.gov/tdv. Every dot on the map is information available to the public. AADT traffic count reports.

- How do we collect the traffic volumes. Frequency is every three to five years including ramp on and off volumes.
    - Utilize tube counts on lower volume roads.
    - Utilize video cameras (Leetron) on higher volume roads.
    - The interstate system and some higher volume highways have permanent continuous count sites that count 24/7/365. DOT has traffic data information on the interstates going back to the 1970's.
    - Turning Count Surveys. Someone pulls up to an intersection, Seventh North and Buckley, are they going straight through, turning right or making a left turn.
    - DOT also has cameras within our Transportation Management Center along I-81, I-690 & I-481 that can be utilized to understand traffic movements.

Streetlights

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- StreetLight provides highly accurate 24/7/365 data to understand mobility patterns in select areas.
- StreetLight harnesses smartphones as sensors to measure vehicles and other modes of transportation (transit, foot, etc.)
- DOT purchased StreetLight data for the I-81 project covering all of 2017. This data is also available to be purchased by businesses.
- Get hourly origin and destination data for motorists of any geographic zone. We are able to draw boxes around Seventh North Street Exit or businesses to filter the data down to how many vehicles are stopping into buy a cup of coffee at Dunkin' Donuts.

Construction Phasing and Timeline

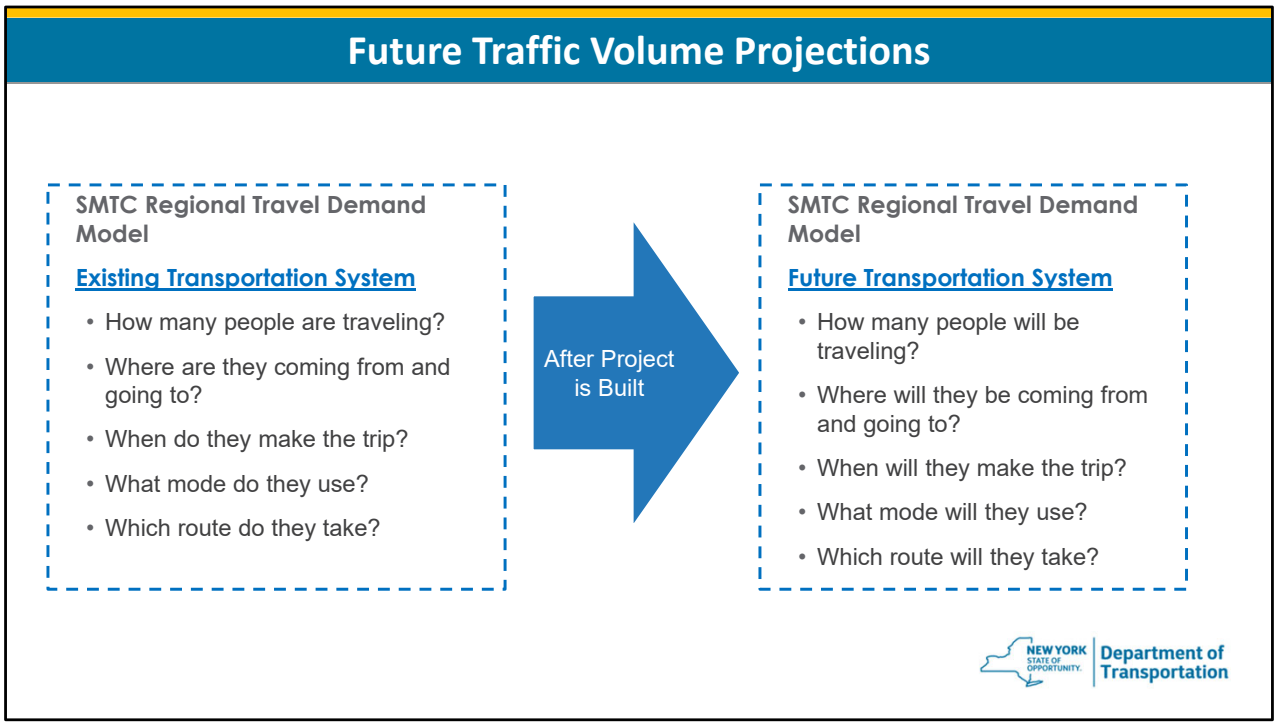
- The project is proposing two major phases to build this project.

- First Phase is 800 Million, will start toward the tail end of next year in 2022 and is anticipated to be completed by the end of 2024. It includes 5 separate contracts, two as part of the I-481 conversion to I-81, and three downtown (Northern Section, I-690 at Crouse & Irving, Southern Section). These five contracts need to be virtually complete before the I-81 Viaduct is taken out of service at the end of 2024.

- The only construction work between Hiawatha (Destiny) and the Northern I-81/I-481 interchange (approximately 6 miles) is sign upgrades and noise wall repair work along I-81. The construction will not impact the 7th North St. exit, Thruway, Airport, Town of Salina, etc.

- Phase 2 will take 3 years (2025 – 2027) to construct and has an estimated construction cost of 1.1 Billion. This includes 3 contracts downtown Syracuse to replace I-690 from Leavenworth to Irving Street and rebuild BL81 through the City.

- It is anticipated that it will take 7.7 million hours to build this one project which translates into 3711 staff years if you divide by 2080 hours/year. DOT is applying to have a local Onondaga County/City of Syracuse goal of 20% workforce. That means that up to 80% of the workforce could come from outside Onondaga County.



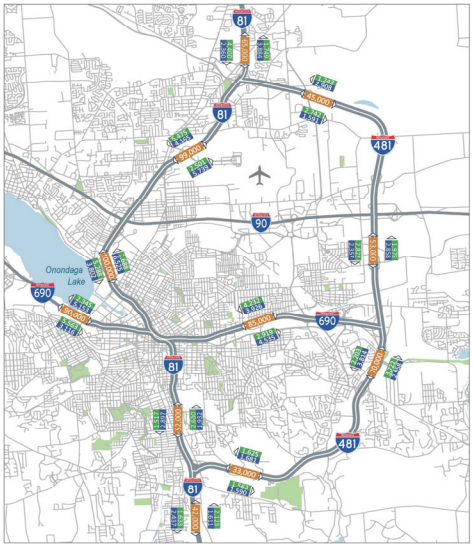
The SMTC Regional Travel Demand Model was the main tool used to project future traffic volumes for the project's estimated time of completion year, 2026, as well as the design year, 2056.

The model data includes population and employment data (where people live and work), as well as future planned land use development projects that would contribute to traffic growth in the future. So the model can help us identify the amount of traffic, the origins and destinations of those trips and when they travel, and the routes used to make the trips.

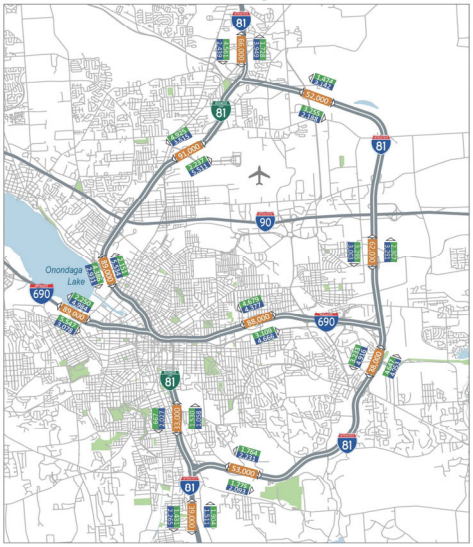
The modifications to the transportation network are then input to the model to identify changes in travel patterns based primarily on travel time. For example, removing the viaduct creates a slightly slower route from north to south traveling all the way through the city, so the model reflects that some of that through-traffic would prefer a different route. Creating a new interchange at Crouse and Irving Avenues would provide a faster route to University Hill, so some traffic currently using other routes would use the new interchange.

Future Traffic Volumes Under Community Grid

No Build



Community Grid



- Traffic volumes on I-81 going by Seventh North Street are anticipated to decrease from 100,000 vehicles/day down to 89,000 vehicles/day. However, the vast majority of this traffic does not exit the highway near 7th North Street.

- Traffic along I-690 would not change much. Traffic on the converted I-481 to I-81 would increase by a few thousand vehicles and would vary by location. The largest changes in traffic volumes would be down by the Dome area and parts south of there.

Seventh North Street Off Ramp Traffic Volumes

6,106 Vehicles/ Day Existing SB

6,669 Vehicles/ Day Future SB

6,156 Vehicles/ Day Existing NB

5,522 Vehicles/ Day Future NB

- Just focusing on the off ramps at the Seventh North Street Exit we have data that shows that on an average weekday, 6,156 vehicles/day utilize the NB Exit Ramp. 6,106 vehicles/day use the SB Exit Ramp.

- After the CG Alternative is built, the NB Exit Ramp traffic would decrease to 5,522 vehicles/day, and the SB Exit Ramp would increase to 6,669 vehicles/day. This is a net difference of 71 vehicles less getting off these exits than current levels.

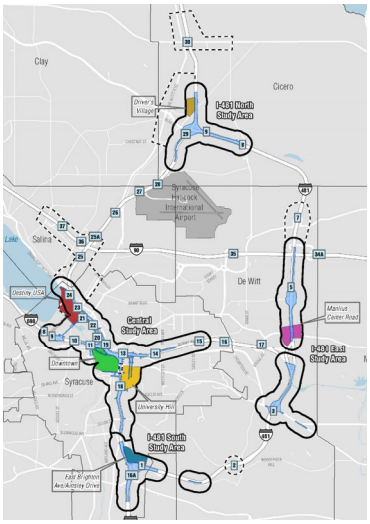
- Total Volumes on 7th North Street itself would be practically identical. Traffic distribution coming from off ramps would shift slightly with more vehicles exiting using the SB exit and less using the NB exit as some local trips heading to points in the south east part of the county shift from using I-81 to head south to using I-90 east to former 481 south.

I-81 Economic Analysis - Objective

- Evaluate project alternatives' effects on local and regional economies:
  - Potential benefits:
    - Temporary construction jobs
    - Neighborhood connectively and improved flow of people and goods
    - Induced growth and improved economic activity
    - Additional municipal tax revenues
  - Potential adverse effects:
    - Indirect (secondary) residential or business displacement due to increased rents
    - Loss of business customer base due to changed travel patterns and reduction in pass-by trips along I-81 and I-481
    - Loss of municipal tax revenues

I-81 Economic Analysis – Study Areas

- Three regional study areas:
  - City of Syracuse,
  - Onondaga County, and
  - 5-County Region (Onondaga County, Oswego County, Cayuga County, Cortland County, and Madison County).
- Local study areas (see graphic):
  - Central Study Area, includes downtown Syracuse
  - I-481 South Study Area
  - I-481 East Study Area
  - I-481 North Study Area
- Supplemental Study Areas (see graphic):
  - Expanded Study Areas added in response to public input
  - Properties along roadways, interstate interchanges, and specific Business Districts where changes in traffic patterns could alter market conditions (increasing or decreasing consumer base)



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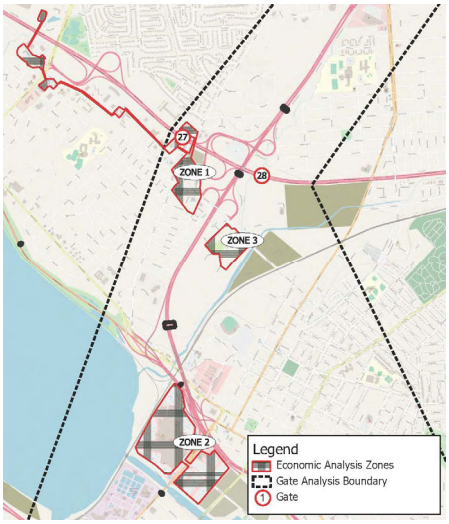
I-81 Economic Analysis – Study Areas

- Evaluate existing market trends in the study areas
- Identify where and how alternatives could alter market trends:
  - Parcels freed up under the Viaduct and Community Grid Alternatives
  - Locations with improved visibility, access, and/or consumer volumes
  - Key destinations and locations that could experience decreases in consumer based due to changes in travel times/patterns
- Research – business inventories based on desktop research and field surveys, land use/zoning analysis, economic and fiscal analysis, Streetlight data, STR hotel data, etc.
- Characterize the nature and scale of market changes at these locations:
  - Does an alternative have the potential for indirect residential and/or business displacement?
  - Does an alternative lead to loss of businesses due to changed consumer travel patterns?
  - Could potential business displacement lead to disinvestment and adverse fiscal effects?



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No Build and Community Travel Times (Minutes)

Year		2020				2050			
Peak		AM		PM		AM		PM	
Origin	Destination	No Build	CG	No Build	CG	No Build	CG	No Build	CG
Cicero	Baldwinsville	21	21	23	23	21	21	23	23
	Destiny USA	11	11	11	11	11	11	11	11
	Downtown	15	13	14	13	15	12	13	13
	Fairmount	21	21	22	22	21	20	22	22
	Fayetteville/Manlius	19	18	19	19	18	17	19	18
	Lafayette	26	27	25	27	27	27	24	27
	Liverpool	13	13	14	14	13	13	13	13
	St. Joseph's Hospital	15	13	12	12	15	12	12	12
	University Hill	19	16	17	15	19	17	16	15
Liverpool	Baldwinsville	13	13	15	15	14	14	14	14
	Cicero	14	14	15	15	13	13	14	14
	Destiny USA	6	7	6	7	6	7	6	7
	Downtown	10	8	9	8	10	8	9	8
	Fairmount	16	16	17	17	15	16	17	19
	Fayetteville/Manlius	20	18	20	19	20	18	20	19
	Lafayette	21	24	20	24	21	24	20	25
	St. Joseph's Hospital	10	8	8	7	10	8	8	7
	University Hill	14	11	12	10	14	12	12	11
Destiny USA	Baldwinsville	22	22	24	25	22	23	26	27
	Cicero	11	12	13	13	10	11	11	12
	Downtown	7	7	9	9	7	7	8	9
	Fairmount	11	11	14	13	11	11	15	14
	Fayetteville/Manlius	17	18	19	19	17	17	19	20
	Lafayette	19	23	20	24	19	24	19	25
	Liverpool	8	9	10	10	8	9	9	10
	St. Joseph's Hospital	7	7	7	7	7	7	7	8
	University Hill	12	10	12	10	11	12	11	11

CG = Community Grid

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I-81 Economic Analysis – Methodology
Effects on Hotel Consumer Base

Based on public comments, NYS DOT developed methodology for supplemental analysis that required the following data:

- Hotel performance metrics (e.g., Occupancy, ADR, RevPar, Revenue)
- 6 years (2013-2019) of STR aggregated monthly trend data for hotels near Interchange 25, including:
  - Tru by Hilton Syracuse North Airport Area
  - Rodeway Inn & Suites Liverpool
  - Staybridge Suites Syracuse Liverpool
  - Best Western Plus Liverpool Syracuse Inn & Suites
  - Country Inn & Suites Syracuse North
  - Holiday Inn & Suites Syracuse Liverpool
  - Homewood Suites by Hilton Syracuse Liverpool
  - Super 8 Liverpool/Syracuse North Airport
  - Hampton Inn & Suites Syracuse North Airport Area
  - Embassy Suites by Hilton Syracuse Destiny USA
  - aloft Hotel Syracuse Inner Harbor
  - Hampton by Hilton Inn & Suites Syracuse Dewitt
- Benchmarked against STR reporting for Greater Syracuse Market

Trend # 1135821_SADIM / Created October 18, 2019

Trend Report - Liverpool, NY Area
Selected Properties

January 2013 to September 2019 Currency : USD - US Dollar

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str

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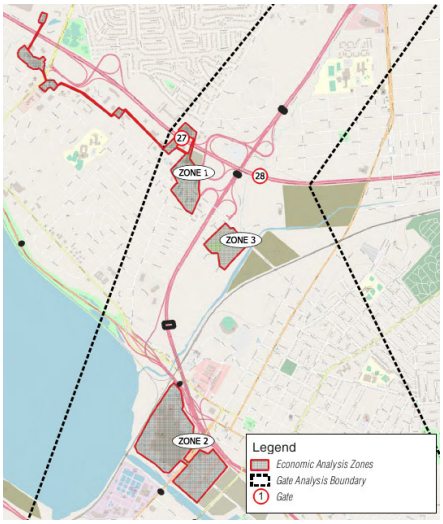
I-81 Economic Analysis - Methodology
Effects on Hotel Consumer Base

Based on public comments, NYS DOT developed methodology for supplemental analysis that required the following data:

- Travel patterns for hotel guests
  - Used *StreetLight* data to identify the paths traffic currently take to the hotel cluster
    - *StreetLight* is an on-demand mobility analytics platform that takes and analyzes vehicle movements using data from mobile devices, connected cars and trucks, as well as census data, road network information and more.
    - Data can be used to determine:
      - Number of trips during different periods of time;
      - Trip variations by day, time period and vehicle type;
      - Traffic volumes; and
      - Identify trip time, length, speed and trip purpose.



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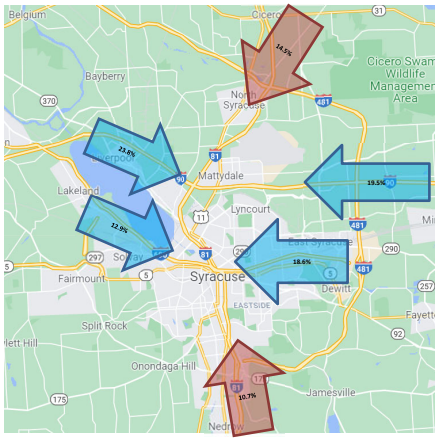
I-81 Economic Analysis - Methodology
Effects on Hotel Consumer Base

Using StreetLight data, identified routes of arrival for existing hotel guests in order to identify subset that *may* decide to re-route:

- Those originating from locations north and south of existing I-481 *may* re-route.
  - 14.5% from I-81 north of I-481 Interchange +
  - 10.7% from I-81 south of I-481 Interchange =
    - 25.2% from I-81 (outside 481)
- Those guests originating from other locations would not have any motivation to alter travel pattern:
  - 12.9% from I-690 west of Hiawatha Blvd +
  - 18.6% from I-690 east of Hiawatha Blvd +
  - 23.8% from I-90 west of I-81 +
  - 19.5% from I-90 east of I-81 =
    - 74.8% of guests with no motivation to alter travel pattern



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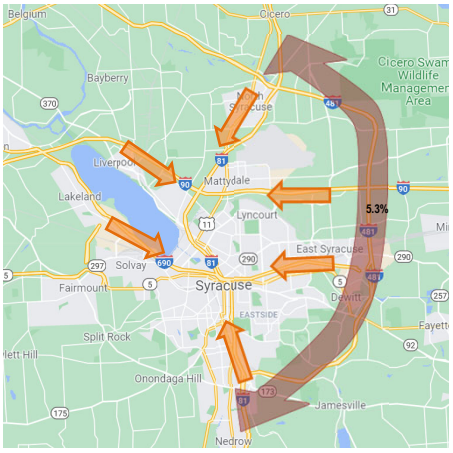
I-81 Economic Analysis - Methodology
Effects on Hotel Consumer Base

Of the 25.2% of guests that originate from locations north and south of existing I-481 and who *may* re-route, how many are *likely* to re-route?

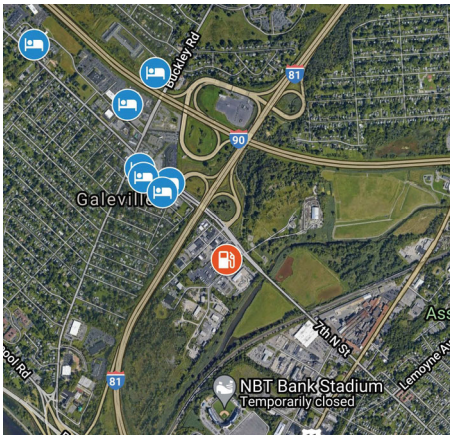
- Guests with Onondaga County destinations in mind are unlikely to re-route. Why?
  - Booked in advance;
  - Hotels are well-positioned in market;
  - Brand loyalty;
  - Smartphone wayfinding;
  - No significant change in travel time if re-routing to I-481
- "Pass-through" travelers are likely to re-route:
  - Based on Visit Syracuse survey, approximately 10 percent of domestic leisure travelers and 6 percent of international leisure travels who stayed in Onondaga hotels were "passing through" the area – i.e., they did not have an Onondaga destination in mind when they stopped.
    - Weighted average = 5.3%
- 5.3% of the 25.2% of guests who may re-route are likely to re-route because they were "pass through" travelers.
  - 5.3% x 25.2% = 1.3% of existing consumer base likely to re-route



I-81 Economic Analysis - Methodology
DEIS Findings – CG Alternative

Changes in travel times and travel patterns under the Community Grid Alternative would not have adverse socioeconomic effects

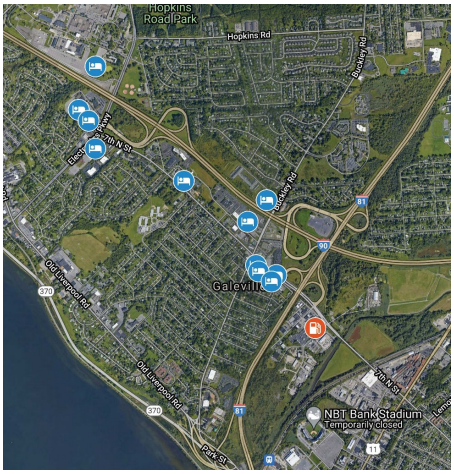
- Increased volume on I-481 could attract new highway-oriented investment such as fast food and gas stations – most likely at I481-Exits 5, 6, and 7.
- Increased travel times and changes in travel patterns could reduce the number of "pass-through trips" by consumers and displace a limited number of businesses:
  - Pilot Travel Center at Interchange 25 is projected to lose 5.3 percent of all trips, including 22.8 percent of the interstate truck traffic traveling on I-81; it would continue to draw customers from I-90 and the Syracuse Airport, as well as from the local area



I-81 Economic Analysis - Methodology
DEIS Findings – CG Alternative

Other businesses are not expected to be adversely affected/expected to remain viable:

- Hotels near Interchanges 23 and 25 would continue to be strategically located within the market.
  - A projected 1.3 percent decrease in consumer trips represents a small portion of total bookings.
  - The hotels' national branding provides marketing capability to remain prominent regionally. Online marketing and brand loyalty combined with smart phone wayfinding reduces these hotels' dependence on capturing consumer trips through visual recognition and at-the-moment visitation decisions.



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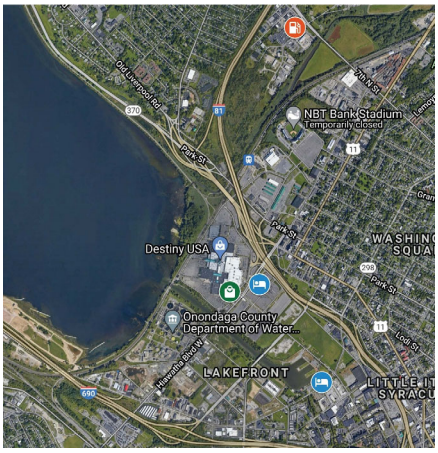
I-81 Economic Analysis - Methodology
DEIS Findings – CG Alternative

Destiny USA

- Travel times from most locations would not change or would increase by less than two minutes. However, travel times from points farthest south (e.g., LaFayette) would increase by up to four minutes during peak hours.
- Destiny USA is a major destination retail use without comparable competitive offerings in the region – change in travel time is not expected to substantively alter existing trade area capture.
- As a destination, Destiny USA is not highly dependent upon "pass through" trips. Rather, most visitors to retailers at Destiny USA make planned trips for purchases.



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destiny usa

October 14, 2021

Mark Frechette, P.E.
Project Director
NYS Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

RE: I-81 Draft Environmental Impact Statement ("DEIS")

Dear Mr. Frechette and Mr. Marquis:

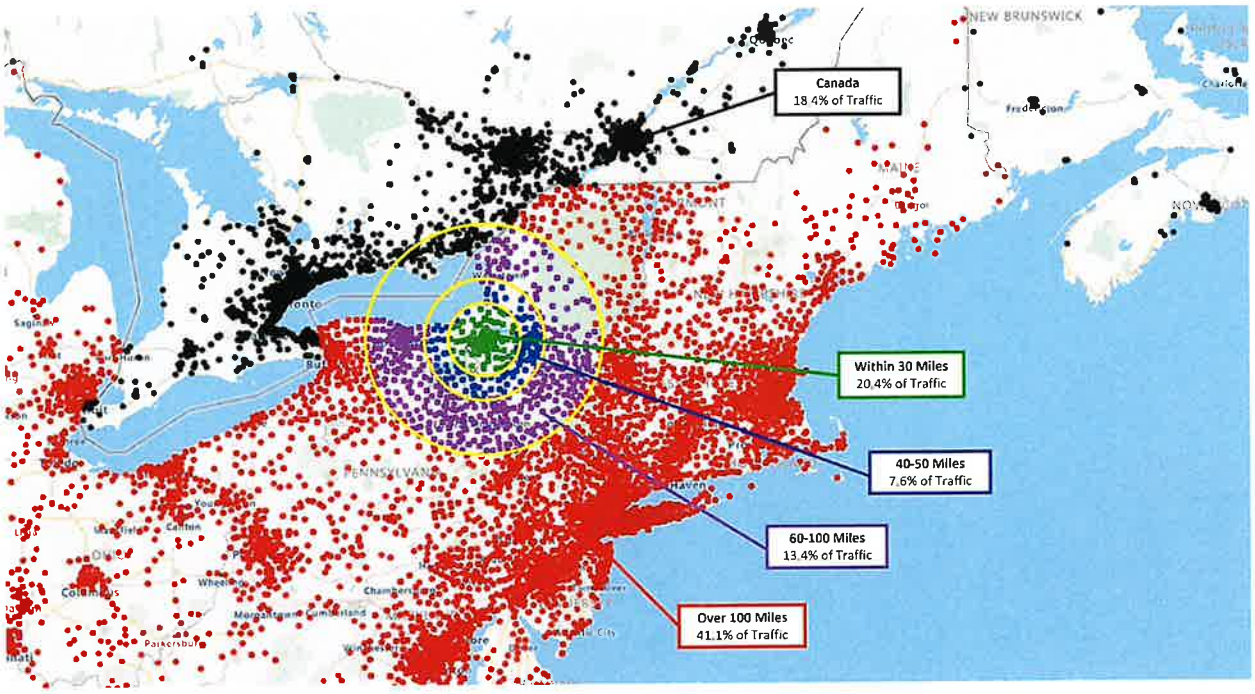
My name is Robert Schoeneck and I am the General Manager at Destiny USA, the largest shopping, dining, and entertainment venue in New York State. I am writing regarding the New York State Department of Transportation ("NYSDOT) DEIS report, specifically "SECTION 6-3-2 LOCAL AND REGIONAL ECONOMIES," in which the NYSDOT's projects the economic impact of rerouting Interstate 81 traffic around to the east of Syracuse via the Community Grid Alternative.

My concerns are as follows:

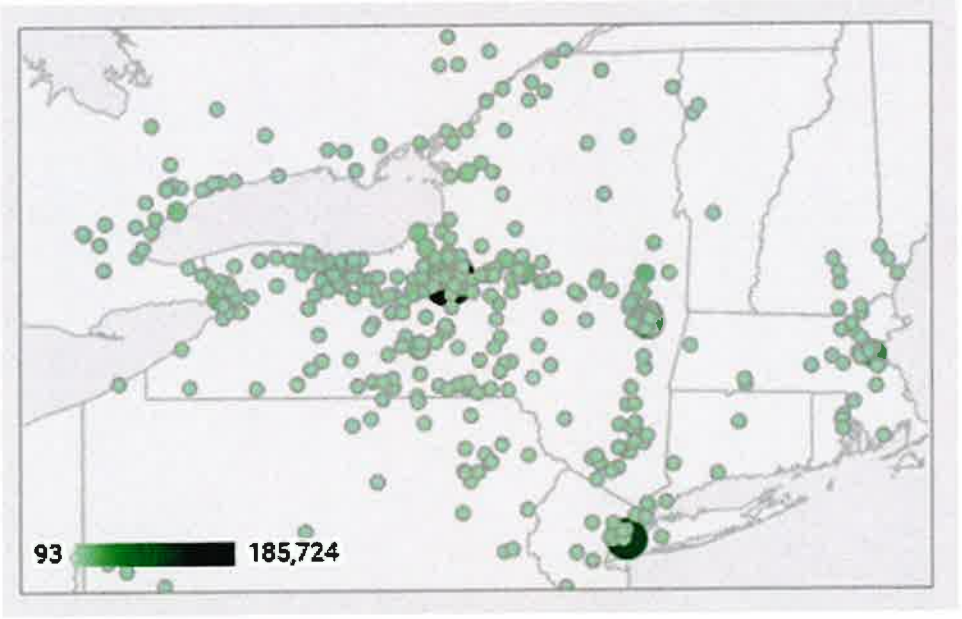
While we received the DEIS report when it was released in July 2021, neither we, nor any of our 260 tenants at Destiny USA were asked to provide information or input, or consulted in any way. We, along with our tenants, understand our business in depth and closely track where our guests are traveling from across a wide spectrum of avenues using tenant sales data and tracking tools such as Placer.ai.

Here are five different sources of data (all from the pre-COVID 2019 timeframe) that clearly demonstrate the bulk of our visitors coming to Destiny USA travel from long distances and a very large share of which rely on Interstate 81 for convenient access – something that is significantly underestimated in the NYSDOT report.

Zip Codes Collected from Destiny USA Guests Who Used Destiny USA's Free on-site WiFi Jan. 1 – Dec. 31, 2019:

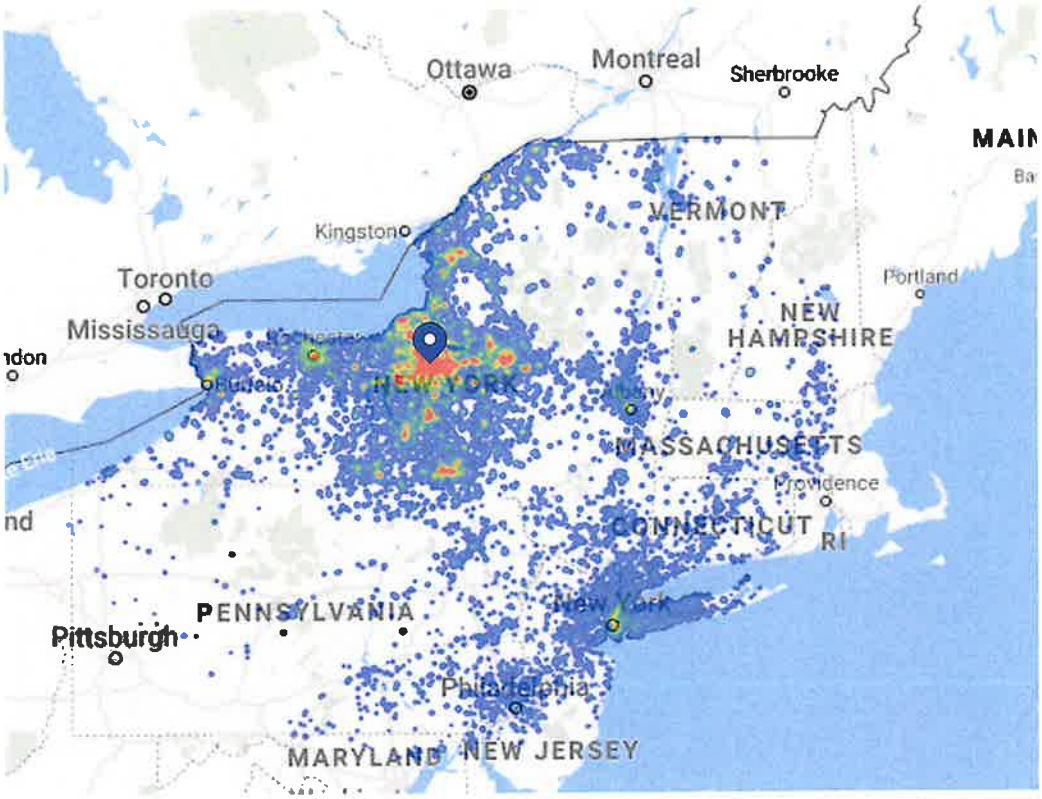


Google Analytics Analysis of DestinyUSA.com's Users Home Locations Conducted for Destiny USA from Jan. 1 – Dec. 31, 2019

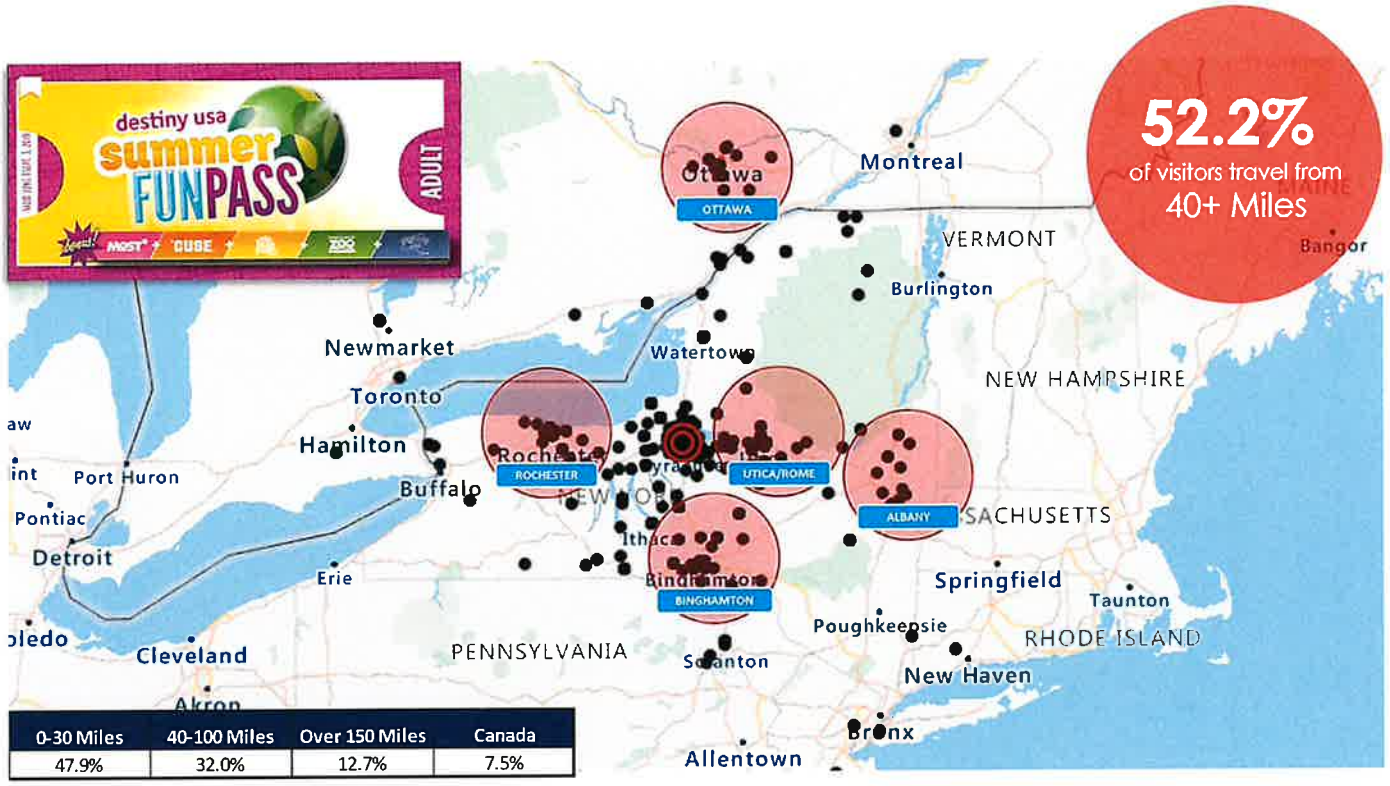


TOP 25 CITIES	
Syracuse	17.69%
New York	10.18%
Albany	5.13%
Boston	2.87%
Chicago	2.76%
Ottawa	1.94%
North Syracuse	1.79%
Fairmount	1.62%
Buffalo	1.59%
Manlius	1.53%
Utica	1.50%
Ithaca	1.49%
Saratoga Springs	1.48%
Baldwinsville	1.27%
Rochester	1.03%
Toronto	1.02%
Cicero	0.98%
Colonie	0.97%
Binghamton	0.85%
Auburn	0.85%
Liverpool	0.83%
Oswego	0.82%
East Syracuse	0.81%
Montreal	0.80%
Troy	0.74%

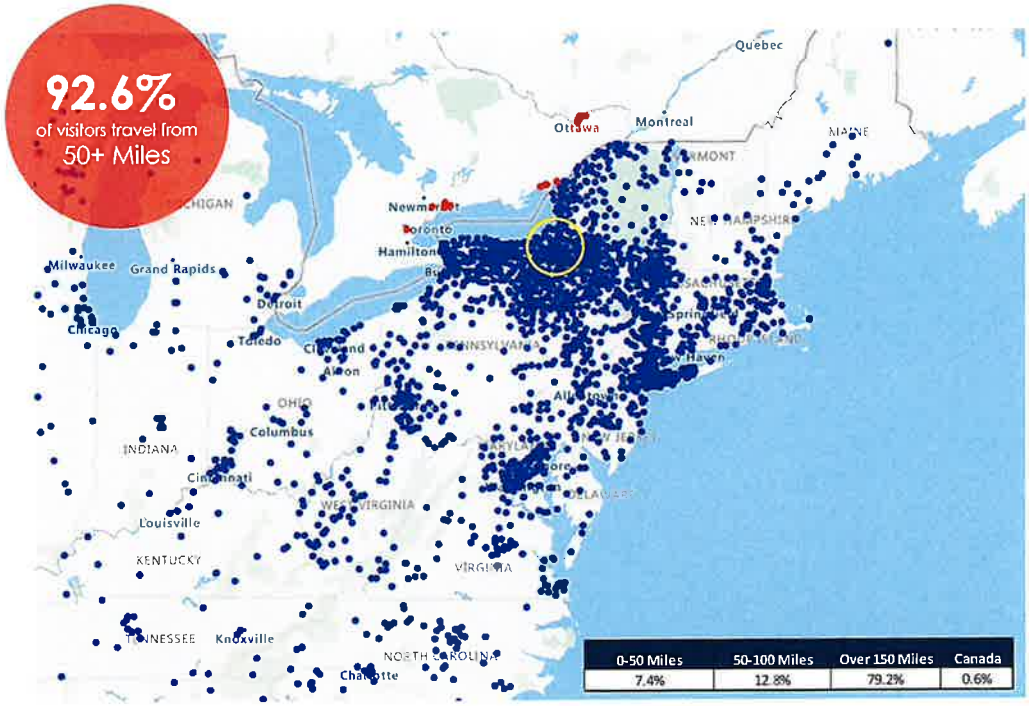
Placer.ai Heat Map Showing the Home Location of the Mobile Devices of Destiny USA Visitors. (2019; Placer.ai is the industry leader in accurate, reliable, accessible and compliant location analytics. Placer.ai analyzes shopping patterns using location data from 30 million devices; Placer.ai does not track Canadian devices)



Zip Codes Codes of Destiny USA Summer Fun Pass Purchasers. (Sold June – September, 2019)

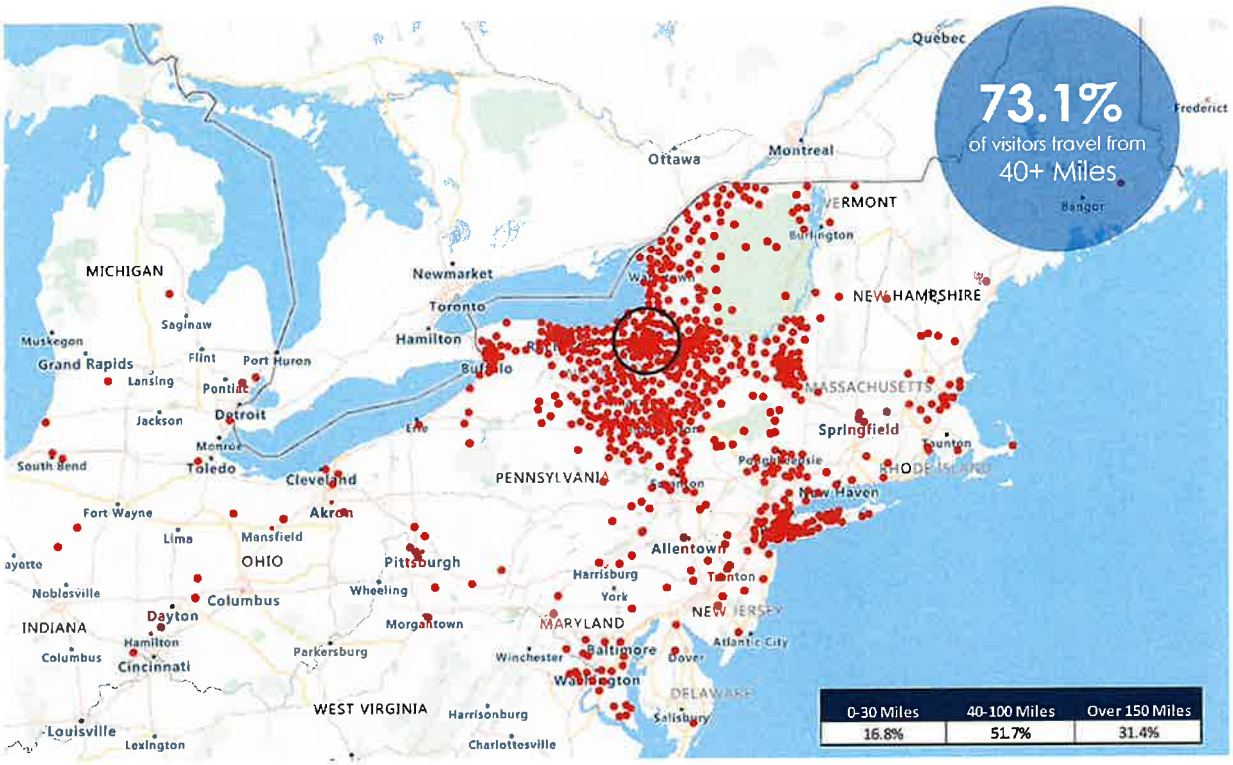


Entertainment Tenant #1 Zip Codes Collected from Guests Who Purchased Admission Tickets in 2019



Destiny USA ▪ 9090 Destiny USA Dr ▪ Syracuse NY 13204
Tel: (315) 422-7000 ▪ Fax: (315) 422-2485 ▪ www.destinyusa.com

Entertainment Tenant #2 Zip Codes Collected from Guests Who Purchased Admission Tickets in 2019 (tenant did not collect Canadian zip codes)

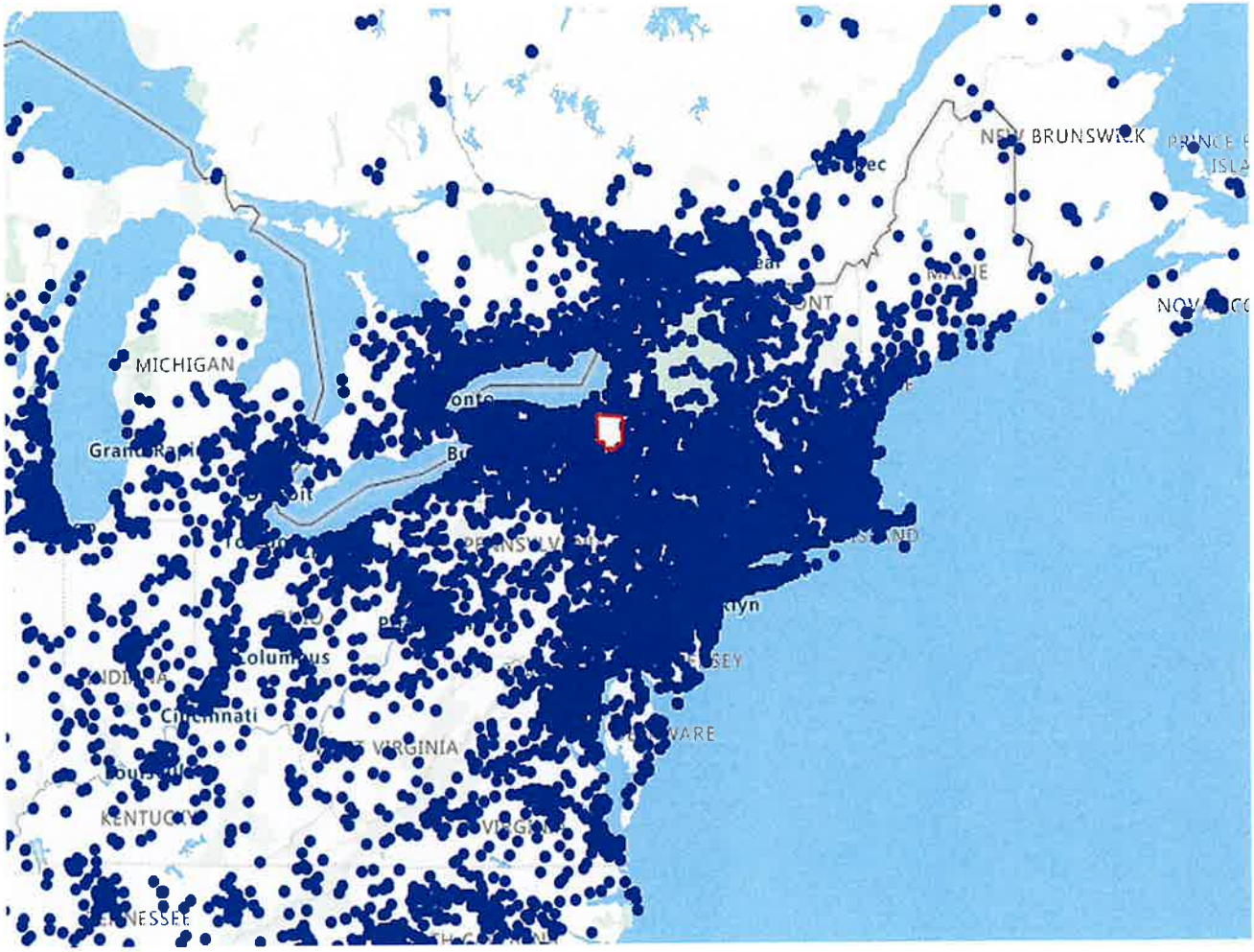


Based on what we and our tenants know about where our guests come from and through independent analysis by Placer.ai, it is clear the DEIS analysis was fundamentally flawed.

Consider the following:

1. NYSDOT's estimated 69.1% of Destiny USA's visitors come from inside Onondaga County and more specifically within the I-481 corridor; yet our multiple data sources show that, in fact, **over 60% of our guests are coming from outside of Onondaga County**.

Zip Codes Collected from Destiny USA Guests Who Used Destiny USA's Free on-site WiFi Jan. 1 – Dec. 31, 2019: (Zoomed out to show breadth of visitors traveling from outside of Onondaga County, outlined in red).



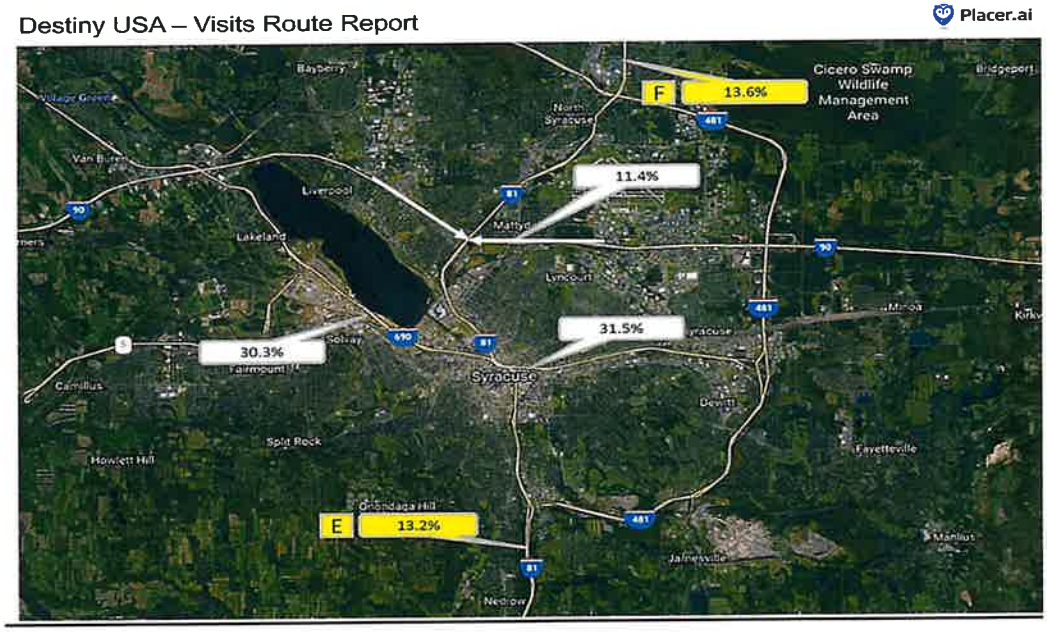
2. The NYSDOT DEIS projects only 8.3% of day trips to Destiny USA from I-81 South of I-481 and I-81 North of I-481 (See A, B and C in chart Below). Independent analysis from Placer.ai determines that of major highway access routes to Destiny USA, 26.8% of visits are from I-81 South of I-481 and I-81 North of I-481 (13.2% [See E Below] and 13.6% [See F Below], respectively).
3. Based on the NYSDOT's flawed approach, its "total reduction in customers" (See D Below) could not be accurate and significantly underestimates the total impact of decommissioning this important section of Interstate 81.

Chart from DEIS; Section 6-3-2 LOCAL AND REGIONAL ECONOMIES

Percent of All Daily Trips Destined to Zones 1, 2, and 3

	Gate #	Description	Zone 1 Hotels	Zone 2 Destiny USA	Zone 3 Pilot Travel Center
A	3	I-81 South of I-481	10.7%	3.9%	4.2%
B	13	I-81 North of I-481	14.5%	4.4%	3.9%
	22	I-690 West of Hiawatha Blvd	12.9%	9.7%	4.1%
	24	I-690 East of I-81	18.6%	9.1%	2.7%
	27	I-90 West of I-81	23.8%	1.0%	5.3%
	28	I-90 East of I-81	19.5%	2.8%	8.5%
		Other (including I-81 between north and south I-481 interchanges)		69.1%	71.2%
		Total	**100.0%**	**100.0%**	**100.0%**
C		From I-81 (Outside 481)	25.2%	8.3%	8.1%
		% Pass-By Trip Capture	5.3%*	34.0%**	66.0%***
D		Total Reduction in Customers (CG)	1.3%	2.8%	5.3%

Placer.ai Independent Analysis Showing Customer Journey Routes to Destiny USA Between Jan. 1 – Dec. 31, 2018 Highlighting Percentages of Traffic (Visits) to Destiny USA via the Major Highways Surrounding Destiny USA



4. *For five decades, Pyramid has been developing shopping centers and other complex properties, choosing locations like Destiny USA specifically for their superior highway access and visibility.*

   By design and of utmost importance to the 260 businesses and 5,000+ employees that work the property, Destiny USA is conveniently located in the center of New York State adjacent to Interstate 81, less than 10-minutes from Syracuse Hancock International Airport and the New York State Thruway. Syracuse is within a 350-mile radius of every major city in the Northeast and includes a population of more than 75 million people. Major target markets within this area include Eastern Canada, regional tourists, university students and all regional residents. The existing complex of major roadways make Syracuse and Destiny USA a prime overnight location for guests traveling between New York City to Niagara Falls and Canada.

   As a major regional attraction, the overwhelming majority of Destiny USA's visitors reach the property through some combination of highway access, with I-81 being the predominate route guests take from the north and south.

   The proposed traffic diversion around Destiny USA to Interstate 481 would negatively impact accessibility, visibility and visitation to Destiny USA.

5. Destiny USA has worked closely with the New York State Tourism and Visit Syracuse organizations to attract out of town visitors including Canadians and International tourists.

   Working in collaboration with New York State, I Love NY and Visit Syracuse, Destiny USA has made tremendous strides in driving the local and State tourism economy. As the top tourist attraction in all of Central New York and the largest shopping, dining and entertainment destination in all of New York State, Destiny USA welcomes millions of visitors from across the globe on an annual basis and has made significant investments in bringing in people from further distances for longer lengths of stay. These efforts include:

   - ***The Central New York Welcome Center Inside Destiny USA***: in 2017, we and New York State announced the grand opening of the Central New York Welcome Center inside Destiny USA, the first of its kind built inside an attraction in New York State. The Welcome Center, one of 11 throughout the state, advances the State's commitment to continue growing the state's tourism industry by promoting local attractions, food and beverage producers, and the region's agritourism destinations. The Welcome Center serves as a great portal for the region and allows guests to get a flavor of all things New York State, including the robust offering of Destiny USA while on their journey.

I Love NY's Central New York Welcome Center In Destiny USA

- ***Our First On-Site Hotel***: In September of 2017, Destiny USA and Embassy Suites by Hilton, a global brand of upscale, all-suite hotels from Hilton, celebrated the opening of the new onsite 209-room Embassy Suites by Hilton Syracuse—Destiny USA. Hotel construction began in June 2016, and it is the first onsite at Destiny USA, features an onsite restaurant and pool and is the go-to property for guests traveling to visit the Destiny USA international travel and tourist destination.

  The hotel welcomed guests from all 50 states and 70 countries within the first two years of being open and serves as the official hotel of Syracuse Athletics and the Syracuse Mets. The hotel caters especially to traveling Canadians, who visit to shop, dine, play and stay at Destiny USA.

Destiny USA Embassy Suites Hotel

- ***A Magnet for Canadian Shoppers***: Canadian shoppers account for 18.4% of shoppers at Destiny USA. With 60% of the Canadian population residing directly across the New York State border, Destiny USA has seen tremendous Canadian traffic over the years, with retailers often accepting Canadian currency and always many Canadian tour buses and license plates found in the parking lot.

  Destiny USA actively caters to the Canadian market with unique promotions and giveaways, including a market-first "at par" stay and play package which included discounted hotel accommodations and Fun Pass at Destiny USA.

Destiny USA + Hotel Co-Branded Canadian Promotion Targeted at Canadians

- ***Motorcoach Group Visitation:*** Since the expansion of Carousel Center and rebranding of Destiny USA in 2012, significant resources have been dedicated to promote the property through domestic and international trade shows and marketing. Results continue to be impressive, bringing substantial additional spending into the Central New York area. Every year, representatives of Destiny USA attend numerous trade shows, sales missions, summits and conferences with the goal of strengthening relationships with established colleagues and introducing the product and area to new operators throughout the world with the goal of encouraging future visitation from both emerging and mature markets.

Destiny USA is an economic catalyst and engine for the City of Syracuse, Onondaga County and Central New York. Destiny USA's direct economic impact can be summarized as follows:

- ***Total Annual Sales Impact***
  - $550,000,000
- ***Annual Sales Tax***
  - $38,560,885 (NYS sales tax, state and county)
    - State: $19,280,443
    - County: $12,917,897
    - Syracuse City & Towns: $6,362,546

There are countless reasons why Interstate 81 should be maintained in its present corridor. This submission speaks solely to the flaws of I-81 DEIS Section 6-3-2 LOCAL AND REGIONAL ECONOMIES.

Sincerely,

Robert J. Schoeneck
General Manager

August 2, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Re: Draft Environmental Impact Statement - Need for Additional Time for Review and Comment

Dear Mark and Rick:

Like many stakeholders in Syracuse and Central New York, we are prepared to review and provide comments on the Draft Environmental Impact Statement ("DEIS") that was released on Friday July 16, 2021.

The purpose of this letter is to formally request that the public comment period be extended through the end of the year to allow sufficient time for a complete review of the 28,000+ page document. COVID has decimated our industry and summer leisure travel has been difficult to manage due to the labor shortage. Most importantly the amount of data just made available, it is not feasible to have complete responses available by September 14th.

The future of Interstate 81 is an important decision that will directly impact our businesses/industry and our team members. It is critical that everyone be provided sufficient time to have their comments submitted and considered.

Thank you in advance for your consideration.

Sincerely,

Viraj Patel
Vice President
Quality Inn & Suites – Syracuse, NY

The Relatives of Harriet Tubman

August 24, 2021

Honorable Joe Biden, President
United States of America
The White House
1600 Pennsylvania Avenue, NW
Washington DC 20500
Re: Interstate 81 - Reconnecting Communities

Dear President Biden

After surviving 2020, the Covid Pandemic, and what can be deemed a biological and psychological war, where we have seen 201 million people affected, 4.2 million deaths, global, national and local economies destroyed, the world, America, Central New York and Syracuse, are once again facing uncertainty and fear as we anticipate dealing with the new Covid Delta Variant.

As you are aware, Central New York is looking at the largest construction and development projects most of us will see in our lifetime. The future of Interstate 81 in Syracuse's urban core is critically important as it has been historically inhabited by African-Americans and low-income individuals and families, reminiscent of the urban renewal policies of the 1960's and the destruction the old Syracuse 15th Ward and a once thriving community.

Right now, to replace the portion of I-81 that runs through Pioneer Homes, Central Village and McKinney Manor, the option being proposed by the New York State Department of Transportation ("NYSDOT"), is what is being called "The Grid", which is simply, "A Road" that is based on an outdated 2008 report that we feel does not apply in today's social, political and economic climate of hopelessness, fear and uncertainty and definitely does not address the need for hope and inspiration, that the community and Central New York needs right now.

We, the family of Harriet Tubman, feel that the symbol of pride, hope and inspiration the people of Central New York and Syracuse need and deserve can be found in supplementing "The Grid" with the Harriet Tubman Memorial Freedom Bridge ("HTMFB"). We strongly endorse it. We feel it will be a symbol of hope and inspiration for the world to see: a symbol that reconciles our past, present and future; a testament to our ancestor and American icon, Harriet Tubman -- the renowned abolitionist and political activist, who lived and died in Central New York and exemplified our American values of courage, freedom and perseverance.

The Harriet Tubman Memorial Freedom Bridge will be a marvelous structure and symbol of pride for the people of Central New York and Syracuse; a work of art and beacon of hope and inspiration for the world to see, stretching up to the North Star, brilliantly lighting the way to our neighbor and at one time, a destination for freedom, Canada. This is what the people of Central New York and Syracuse need now, in this time: a symbol of hope and inspiration, not just a "Grid", a testimony to our community's strength, courage and perseverance.

With your help and support, we will achieve everyone's goal of both reconnecting and redevelopment of Syracuse's urban core; while having a living tribute to an American icon. We see a comprehensive project that can be a real draw and connection for national and international visitors and welcomed tourism to the Harriet Tubman House and Complex in Cayuga County. The Harriet Tubman Memorial Bridge will be a true gateway initiating from a refurbished African American neighborhood to the social justice trail through the Finger Lakes. The Southside of Syracuse could have its own welcoming events around Juneteenth. The HTMB will enhance a tourism site that is growing in Auburn.

Now is the time to do this correctly. We appreciate your consideration.

Sincerely,

The Relatives of Harriet Tubman

Print PAULINE COPES JOHNSON Signature Pauline Copes Johnson
Pauline Copes Johnson - Family Matriarch

Print Deidre Johnson Stanford Signature Deidre Johnson Stanford

Print GARETH LEE JOHNSON Signature Gareth Lee Johnson

Print Kevin L. Johnson Signature Kevin L. Johns

Print Keyonna Long Signature Keyonna Long

Print Keyarra Long Signature Keyarra Long

Print Charisse Mead Signature Charisse Mead

Print Thomas Stanford Signature Thomas Stanford

Print Deanna Walz Signature Deanna Walz

Print Chaunie M. Myers Signature Chaunie M Myers

Print Karen Johnson Walker Signature Karen Johnson Walker

Print Milton C. Walker III Signature Milton C Walker III

Print Teia Hawkins Signature Teia Hawkins

Print MARQUIS Taylor Signature Marquis Taylor

Print Camcryn Taylor Signature Camcryn Taylor

Print Delvonte Copes Signature Delvonte Copes

Print Curtis Hawkins Signature Curtis Hawkins

Print Damir Lacoste Signature Damir Lacoste

Print Edward Copes Signature Edward Copes

Print EDWARD COPES JR Signature Edward Copes JR

Print MAKailah Lacoste Signature Makailah Lacoste

Print Devon Copes Signature Devon Gardner-Copes

Print Destiney Copes Signature Destiney Copes

Print Shayne Copes Signature Shayne Copes

Print Devyanna Gardner Signature Devyanna Gardner

Print Leniyah Gardner Signature Leniyah Gardner

Print Maxine E. Wilson Signature Maxine E. Wilson

Print Brandi Wilson Signature Brandi L. Wilson

Print Myrisha Logan Signature Myrisha Logan

Print Markala Logan Signature Markala Logan

Print Marcus Logan 2nd Signature Marcus S. Logan 2nd

Cc: Secretary Pete Buttigieg, US Department of Transportation
Senator Charles Schumer
Senator Kirsten Gilibrand
Congressman John Katko
Governor Kathy Hochul
Charles Small, Deputy Assistant Secretary Intergovernmental Affairs, USDOT
Commissioner Marie Therese Dominguez, NYSDOT
Assemblyman William Magnarelli, Chair of Transportation Committee

Print CHARLEI BARNES Signature Charlei Barnes

Print SHAHEEN DAVIS Signature Shaheen Davis

Print TEESHA BARNES Signature Teesha Barnes

Print LASHONDA BARNES Signature La Shonda Barnes

Print JAYVON WHITE CO Signature Jayvon Whites

Print CHRISTOFER MARTINEZ Signature Christofer Martinez

Print AMARI NKWNSEI Signature Amari Kwansei

Print JEREMIA McGRIFF Signature Jeremiah McGriff

Print Milton Walker IV Signature Milton Walker IV

Print TIFFANY FORD Signature Tiffany Ford

Print JERRAD FORD Signature Jerrad Ford

Print CHERYL FORD Signature Cheryl Ford

Print DWANA JOHNSON Signature Dwana Johnson

Print CUTHER JOHNSON Signature Cutter Johnson

Print TERRENCE WOLFORD Signature Terrence Wolford

Print Otis Johnson Signature Otis Johnson

Print QUENTIN JOHNSON Signature Quentin Johnson

Print KATHLEEN JONES Signature Kathleen Jones

Print KEVIN JOHNSON JR. Signature Kevin Johnson Jr.

Print KEVONAH L. JOHNSON Signature Kevonah L. Johnson

Print KELIA JOHNSON Signature Kelia Johnson

Print TAMARA THOMAS Signature Tamara Thomas

Print Lee Brooks jr Signature Lee Brooks jr

Print A'Donis Brooks Signature A'Donis Brooks

Print Antonye Owens Signature Antonye Owens

Print Shalonda Young Signature Shalonda Young

Print Cherlyn Johnson Signature Cherlyn Johnson

Print Jimmie Armstead Signature Jimmie Armstead

Print Shawndell Johnson Signature Shawndell Johnson

Print Albert Williams Signature Albert Williams

Print Shalica Williams Signature Shalica Williams

Print Mary Williams Signature Mary Williams

Print Kenya Armstead Signature Kenya Armstead

Print Alex Brooks Signature Alex Brooks

Print Daequan Brooks Signature Daequan Brooks

Print Damon Brooks Signature Damon Brooks

Print Brenton Walker Signature Brenton Walker

Print Jason Walker Signature Jason Walker

Print Shannon Walker Signature Shannon Walker

Print Tierney L. Nicolella-Johnson Signature Tierney L. Nicolella-Johnson

Print Alejandro L. Sims Signature Alejandro L. Sims

Print Aurora L. Sims Signature Aurora L. Sims

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Print Zanadia Long Signature Zanadia Long

Print Syncerah Long Signature Syncerah Long

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Print Zanihah Pitts Signature Zanihah Pitts

Print Zyekier Pitts Signature Zyekier Pitts

Print Leslie Walker Signature Leslie Walker

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Print Duan Theodore Johnson Signature Duan Theodore Johnson

Print Duane Neil Johnson Jr Signature Duane Neil Johnson Jr

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Print FREDERICK THOMAS, JR Signature Frederick Thomas Jr.

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September 9, 2021

Mark Frechette, P.E.
Project Director
NYS Department of Transportation, Region 3

Dear Mr. Frechette,

I have three main concerns regarding the I-81 project:

- That guarantees be given to all affected public housing residents that they will be provided with adequate housing equal to or better than their current home at the same cost they now are paying during the construction period. And that they will either be able to return to their current homes or be provided with housing equal to or better than their current homes once the project is completed. This does not simply mean giving them vouchers, which are worthless if landlords don't accept them.

- That a substantial number of jobs on the demolition of Route 81 and the construction of the Community Grid and related work be available for Syracuse city residents in general, and African American residents in particular.

- That the Community Grid be less of a highway and more of a pedestrian-friendly street. I'm concerned about the width of the streets being proposed and fear it will be another "Erie Blvd. E." or "West Street", making it difficult to cross and continuing to separate the community.

Thank you,

Charles Russo
126 Jamesville Ave., Apt. N4
Syracuse, NY 13210
Ctr0846@gmail.com