



**PARTNERSHIP  
FOR THE  
PUBLIC GOOD**

617 Main Street Suite 300 Buffalo NY 14203

[www.ppgbuffalo.org](http://www.ppgbuffalo.org)

January 9, 2020

City of Buffalo Planning Board  
65 Niagara St, Room 901  
Buffalo NY 14202

Dear Planning Board Members:

The Partnership for the Public Good unites 300 organizations committed to a just, equal, and culturally vibrant western New York. We write to oppose the Queen City Landing plan for 975/1005 Fuhrmann Boulevard as inconsistent with the City's Green Code, Local Waterfront Revitalization Plan, and Comprehensive Plan.

**1. It is much too high and large.**

- a. The Green Code limits height in N-1S zones to six stories and 90 feet. The Queen City plan calls for a 20-story, 240-foot-tall, 290-foot-long structure with 350 covered and 222 surface parking spaces.
- b. This huge structure will have significant negative impacts on scenic beauty and bird mortality. It violates the LWRP priority of protecting the Niagara River Globally Significant Important Bird Area.

**2. It is inappropriate for the site.**

- a. The LWRP prioritizes water-related uses. A residential tower is not water-related.
- b. The LWRP prioritizes public access to the water. A private development with 206 units will impede public access – for example, by generating a large amount of vehicular traffic (over 2,600 vehicles per day) crossing the bike and pedestrian paths.
- c. Buffalo has roughly 10,000 vacant lots and many neighborhoods that urgently need more residents. New housing should be focused on transit lines in the urban core, rather than sprawling out to the lake shore, which lacks the infrastructure and urban fabric for housing. Buffalo's Comprehensive Plan states that it is driven by three principles: "fix the basics and build on assets;

target sustainability; and employ smart growth.” This plan violates all three principles.

- d. Buffalo is the tenth windiest city in the nation, and Erie County ranks third in the state for flooding. The Outer Harbor is located in a 100-year flood plain prone to tsunami-like seiche events. On February 24, 2019, winds reached 69 miles per hour in Buffalo, forcing ice ashore, creating heaps up to 40 feet high, and knocking down trees and streetlights. Due to climate change, extreme weather events are becoming more frequent. The Outer Harbor has limited evacuation routes and is far from emergency services; it is not a safe or intelligent place for a housing tower.

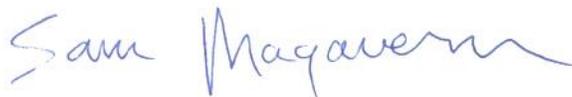
**3. It is not a planned unit development.**

- a. A PUD, in the Green Code, is meant to be a “creative use of land” that is “in harmony with the objectives of the Comprehensive Plan” and that promotes “diversification in the uses allowed and variation in the relationship of uses, structures, and public space in developments conceived as cohesive unified projects.”
- b. The Queen City plan is for a single huge tower with a very typical blend of residential and commercial uses. There is no justification in the Green Code for treating it as a PUD.

Buffalo’s Outer Harbor is a rare jewel: a beautiful, historic place to enjoy access to the majesty of the Great Lakes. It is ecologically important and fragile. To approve the Queen City plan would be a major setback for a City rediscovering the unmatched potential of its waterfront.

Thank you for considering these remarks.

Sincerely,



Sam Magavern  
Senior Policy Fellow  
Partnership for the Public Good

Cc: Mayor Brown, Common Councilmembers