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East Delavan Sewer Improvements Project (SPP 333 CSO-053_11)

Response to Comments on Draft Scope of Work
June 25, 2025

BUFFALO SEWER AUTHORITY

LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT SCOPE OF WORK

ELECTED OFFICIALS

1. Crystal Peoples-Stokes, Majority Leader of the NYS Assembly, verbal comments during DSOW Public Hearing on October 15, 2024, (Comments # 9, 10, 13, 17, 18, 22, 23, 34, 35, and 42)

GENERAL PUBLIC/ORGANIZATIONS/AGENCIES

2. Ada Hopson-Clemons, verbal comments during DSOW Public Hearing on October 15, 2024, (Comment # 11, 19, 27, and 37)
3. David Stout, Retired NYSDEC Environmental Analyst, written comment provided via e-mail on October 16, 2024, (Comment # 39)
4. Deborah Tucker, verbal comments during DSOW Public Hearing on October 15, 2024 (Comment # 25 and 26)
5. Emily Dyett, verbal comments during DSOW Public Hearing on October 15, 2024 (Comment #4, 14, and 32)
6. Eva Simpson, verbal comments during DSOW Public Hearing on October 15, 2024, (Comment #29)
7. Francis Wagner, Scajaquada Canoe Club, verbal comments during DSOW Public Hearing on October 15, 2024, (Comment # 3)
8. Heather Ault, comments received during DSOW Virtual Public Hearing on October 17, 2024, (Comment #30)
9. Jeff Carballada, written comments received via e-mail on November 1, 2024, (Comment # 38 and 41)
10. John Cromwell, verbal comments received during DSOW Public Hearing on October 15, 2024, (Comment # 5, 12, 21, 24, 28, 33 and 36)
11. Mark Kubiniec, written comments received via e-mail on October 31, 2024 (Comment # 37)
12. Michael Anderson, verbal comments during DSOW Public Hearing on October 15, 2024, (Comment # 15 and 16)
13. Pastor Steve, verbal comments during DSOW Virtual Public Hearing on October 17, 2024 (Comment #1, 2, 6, 7, 8, 20 and 40)
14. Ryan Darton, comments received during DSOW Virtual Public Hearing on October 17, 2025, (Comment # 12)
15. Valerie Juang, written comments received via e-mail on October 31, 2024, (Comment # 37)
16. Zoe Tuppen, written comments received via e-mail on October 31, 2024, (Comment # 37)

This document presents responses to comments and responses received on the East Delavan Sewer Improvements Draft Scope of Work (DSOW) issued on October 4, 2024.

General Project Inquiries

Comment 1. How was the project location determined?

Response: The Sewer Patrol Point (SPP) 333, is where the Delavan Sewer and Scajaquada Drain discharge combined sewage over a weir and into Scajaquada Creek. The Scajaquada Drain was constructed from 1920 to 1925 and the discharge to the Creek – at the entrance to Forest Lawn Cemetery – and the immediate upstream SPP 333 weir are in a fixed location and collect water from the surrounding sewershed. The goal of the project is to reduce these overflow events and to do so, the diversion chamber, conveyance pipes and storage facilities must all be located immediately adjacent to SPP 333 and be able to capture water from the sewershed. A figure has been included in the DEIS to better describe the need for the project at this location.

The location for both alternatives was chosen when the original Long Term Control Plan (a plan that describes how a community will comply with water quality standards as well as other Combined Sewer Overflow Policy (CSO) and Clean Water Act requirements) was developed in 2014. Other locations were also considered, including a location south of the current location for this project, along Spillman Ave. However, this was not selected since construction of the required CSO Storage Facility at an alternate location would require more extensive work, such as the addition of a pump station, which would have larger construction impacts, require larger above ground facilities, and have higher capital, operation and maintenance costs.

The downstream discharge location into an existing drop shaft of the Scajaquada Interceptor Tunnel (Drop Shaft 3) is located at the corner of Spillman and Florida. This is also a 'fixed' location so that the dry weather and wet weather flows can be conveyed to Buffalo Sewer's Bird Island Wastewater Treatment Plant (WWTP).

Comment 2. It seems to me that this is going to impact a lot of homeowners and businesses. What was considered? There is a lot of empty land in Delaware Park and that's right along the Creek. I'm thinking that area just southwest of where the Creek goes into the underflow under Hoyt Lake; can the Project be placed in that location?

Response: The empty land within Delaware Park would not be suitable for placement of the CSO Storage Facility because it is located downstream from the overflow locations within the existing combined sewer system. SPP 333 controls when overflows occur. The proposed Project would capture the combined sewage just upstream of where SPP 333 discharges into Scajaquada Creek. Once stored combined sewage is released following a storm event, it would flow to the Scajaquada Tunnel Interceptor to be conveyed to Buffalo Sewer's Bird Island Wastewater Plant. The proposed alternatives and their locations allow for capturing combined sewage before it discharges to Scajaquada Creek and conveying it to the Scajaquada Interceptor via gravity.

Comment 3. What is the target for this project in terms of percentage reduction of CSO impact on Scajaquada Creek from this project area, and how are you going to measure that prior to and at the completion of the project?

Response: Based on USEPA's Storm Water Management Model, as of 2023 there are currently up to 24 combined sewer overflows within a typical year at SP 333. The project would reduce the frequency of activations to four or less per year to the Scajaquada Creek.

Comment 4. Does the tank or tunnel store the same amount of water?

Response: Yes, both alternatives would store the same amount, approximately 1.5 million gallons.

Comment 5. You addressed it before, but this is going to go the entire length of the Scajaquada Creek Drain system. What is the overall time frame that you're speaking of, decades probably or?

Response: The Buffalo Sewer Queen City Clean Waters program includes implementation over 50 sites in total and will cost approximately $1 billion over the next 15 years. Four project types are included in this program including Bird Island Wastewater Treatment Facility upgrades, Combined Sewer Overflow storage projects – that the East Delavan project is part of – as well as Real Time Control Smart Sewers, sewer improvements and modifications, and green infrastructure projects.

Comment 6. In the area further west of Main Street, there is not an issue of overflow into the Creek. Is that correct?

Response: The East Delavan Sewer Improvements Project is addressing combined sewer overflows into Scajaquada Creek. There are overflows that occur West of Main Street which are being evaluated by other projects within Buffalo Sewer's Queen City Clean Waters initiative.

Comment 7. Does the route of the tunnel that goes to the sewage treatment plant parallel the creek?

Response: The proposed project would connect to the Scajaquada Tunnel Interceptor. This tunnel parallels and crosses under Scajaquada Creek. The interceptor runs from Schiller Park across the City. The Scajaquada Tunnel Interceptor then straightens west of Main Street and runs under Lafayette Ave, eventually connecting to another interceptor sewer at Niagara St. The project would not alter this route. The new infrastructure would connect to the portion of the Scajaquada Tunnel Interceptor in the project area.

Comment 8. If the Eastside Parkway is successful in getting the Humboldt tunnel project abandoned, and instead to infill that ditch and put a parkway in its place, would that existing ditch be sufficient to put in the proposed sewer containment system? It would certainly save a lot of blasting of bedrock, because it's already been done.

Response: The plan for the East Delavan Sewer Improvements project has been underway for many years and it needs to be completed within the next 5 years. As the outcome of the improvements proposed by NYSDOT for Route 33 are unknown, Buffalo Sewer cannot develop a plan to meet their USEPA and NYSDEC requirements that would rely on potentially repurposing the current highway as a combined sewage storage facility. In addition, the location of the Humbolt tunnel project would require the construction of a separate tunnel to transfer any water that is stored to bring it back to the Scajaquada Tunnel Interceptor. It would not be able to be used without the construction of additional infrastructure in a similar location to the proposed Project.

Comment 9. Is there another area in the City of Buffalo that has a similar sewer issue that needs to be repaired either now or in the future?

Response: As part of the Queen City Clean Waters initiative, 12 sites throughout the City of Buffalo will require the construction and implementation of projects similar to the East Delavan Sewer Improvements Project. Additional initiatives, including the installation of green infrastructure to manage combined sewer overflows and address climate challenges like urban flooding, are also being considered for future implementation.

Comment 10. There's cold springs under this area as well, is that going to impact your work in the other 13 areas that have a similar issue, or do they have water issues, spring issues?

Response: Yes, Buffalo Sewer is aware of the cold springs and the Project will be designed to respond to these conditions. Every location has different geological issues. Bedrock within the City of Buffalo is high and for this Project, we are cognizant of the high bedrock, cold springs, and sulfur layers that exist within the bedrock. These conditions and how the Project would address them are discussed within the EIS.

Comment 11. Given the proposed project location, how is it going to affect Delevan and Main? Given it's on Jefferson and Main Street, how will the tank help anyone at Bailey and Delavan and Pine Ridge and Delavan?

Response: The Project will indirectly support residents at Bailey and Delavan as well as Pine Ridge and Delavan as it will reduce the number and volume of Combined Sewer Overflows to the Scajaquada Creek system. The Scajaquada Drain, the Scajaquada Creek and the Scajaquada Tunnel Interceptor are all interconnected and any projects that make improvements within the system are a benefit for all residents.

Comment 12. How deep into the bedrock would the cut need to be in order to accommodate either Option A or Option B?

Response: Both Option A (the Deep Storage Tank) and Option B (the Storage Tunnel) would be located approximately 50 feet below surface. In both cases, the bedrock is three to five feet below the existing lawn area/street surface. The project needs to dig a deep hole in order to store the 1.5 million gallons of intercepted combined sewage in as compact a space as possible. The selected CSO storage facility also needs to be approximately this deep to connect to the existing Scajaquada Interceptor Tunnel. The depth of the facilities also allows the construction to advance without the need to relocate or interfere with other utilities (i.e. natural gas, water, electric, telecommunications) which tend to be a few feet below the ground surface.

Comment 13. So the tank and the tunnel will go the same depth, or does the tank go deeper?

Response: The tunnel would be slightly deeper. This could increase risks associated with construction related to worker safety and encountering a cold spring or area of bedrock with high hydrogen sulfide levels.

Comment 14. The tunnel would be constructed to hold stormwater; would the tank also be for stormwater storage or would it store sewage?

Response: Both the Storage Tunnel and Deep Storage Tank would store combined sewage which would include a mix of stormwater and sanitary flow (sewage). The combined sewage

would be stored underground temporarily before being sent to the Bird Island Wastewater Treatment Plant for treatment. As of February 2025, Buffalo Sewer has selected the Deep Storage Tank as the preferred alternative based on feedback from public engagement activities.

Comment 15. How do you plan on aerating a tank of that size, because you're not only talking about sanitary sewage, you're also talking about stormwater as well.

Response: The project does not have any aeration of the combined (i.e. sanitary and stormwater) sewage. The combined sewage would be temporarily stored in the tank and then released to the Scajaquada Tunnel Interceptor. The Project would include louvers and fans to draw fresh air through the facility and the air would be treated by an odor control facility before it is released to the environment. The goal of this system would be to minimize any odors emanating from the facility or local combined sewer system.

Comment 16. What's the pumping capacity of the project?

Response: The Project would not require pumping since combined sewage stored within the Deep Storage Tank or Storage Tunnel would be released by gravity to the Scajaquada Tunnel Incerceptor for transmission to and treatment at the Bird Island Wastewater Treatment Plant following the conclusion of a storm event. Motorized gates would be used to control the storage and release of the combined sewage.

Comment 17. Please confirm that either one of these options will solve the same problem.

Response: Yes. Both the Storage Tunnel and Deep Storage Tank project alternatives would be designed to hold a combined sewage volume of 1.5 million gallons. All combined sewage stored in the tank or tunnel would eventually be conveyed to Bird Island Wastewater Treatment Plant for treatment, following a storm event. Therefore, the two alternatives would provide temporary storage of combined sewage, reducing the number and volume of combined sewer overflows (CSOs) to Scajaquada Creek and would operate in a similar manner.

Comment 18. Has Buffalo Sewer started conversations with Canisius yet regarding the project? Is progress being made?

Response: Yes. Buffalo Sewer and Canisius University have been actively coordinating to support the Project.

Comment 19. How soon will the project commence and what is the estimated duration?

Response: Construction of the Combined Sewer Overflow Facility would occur between 2027 and 2030.

Comment 20. What is the red box? (regarding map)

Response: This question is regarding a project information sheet that was distributed at public events during the public comment period on the Draft Scope of Work. On the sheet, the pink/red box on the left is representative of the on and off sidewalk and roadway closures that would be necessary to construct a portion of the project. Closures would occur during construction in this location to connect portions of the work.

The blue rectangle on the left side of the figure represents traffic and roadway closures that would occur during project construction associated with Option A, the Deep Storage Tank.

On Florida St., the purple box represents a road closure during construction to conduct work in that area.

For Option B on the figure, the Storage Tunnel, the yellow rectangle represents traffic and roadway closures that would be necessary to complete construction of that option.

Comment 21. When will the choice be made between the options?

Response: When the Draft Scope of Work was published in October 2024 Buffalo Sewer had not chosen a preferred alternative however, as of February 2025, the Deep Storage Tank was selected as the preferred alternative as a result of feedback received from the community.

Contracting and Construction Workforce

Comment 22. What kind of workforce does this require?

Response: The workforce required to construct either alternative would include some general construction and construction management workers and specialized workers trained to work in subsurface and underground environments.

Comment 23. Are these facilities made locally or are they outsourced? Would they be constructed by local workforces using local materials?

Response: The Project would largely be constructed with local materials (i.e. concrete, stone, etc.) and it is anticipated there would be local Contractors and labor involved as well. There are some specialty construction items, such as rock blasting and microtunnelling, that require specialized skills and that work may be done by firms from outside the area. It is also noted that the project is receiving federal funding and would be subjected to the requirements of the Build America, Buy America (BABA) Act which requires certain materials be produced in the United States.

Comment 24. Would steel or other outside materials be used during construction of the selected alternative?

Response: Steel would be used inside the concrete in the form of rebar and there would also be steel gates used to control flow into and out of the Deep Storage Tank or Storage Tunnel. The project is still in the design phase and a construction Contractor has not been selected at this time. It's anticipated the Contractor(s) would be selected in 2026.

Comment 25. Is there any benefit for anyone living in the community employment-wise to be a part of this Project? Have the contracts been chosen? Is there a process for selection of the Contractor?

Response: This Project would be subject to open bidding and public procurement law and is going to be partially funded through loans and grants from New York State and the Federal government. This requires that both minority and women-owned business goals be met. In general, Buffalo Sewer is also encouraging the inclusion of local minorities, women,

or disadvantaged businesses in our contract to ensure opportunities to help meet local employment goals and is committed to those efforts on this and other projects. The project is still in the design phase and a construction Contractor has not been selected at this time. It's anticipated the Contractor(s) would be selected in 2026.

Comment 26. For those who weren't aware that there was going to be an open fair tomorrow (10/16/2024), how are people or small business owners notified?

Response: If you are a small business owner, there is an online open house that will be posted, and any updated information related to the Project can be found on the Buffalo Sewer Authority's website.

Buffalo Sewer is working with other organizations that are well versed in supporting and encouraging women- and minority-owned businesses to become certified, which is a formalized process. However, this project is subject to an open bidding process that will be advertised in newspapers such as the Challenger. We are also working with our consultants to try to develop other opportunities and ways to engage the community as part of Buffalo Sewer's Queen City Clean Waters program.

<u>Construction Impacts</u>

Comment 27. Construction-wise, which of the options being considered takes longer to construct?

Response: Construction of the Storage Tunnel would take at least a year longer than the Deep Storage Tank.

Comment 28. For Option A (the Deep Storage Tank), would the blasting impact the same neighborhood as Option B (The Storage Tunnel)?

Response: Vibrations from blasting due to construction for the Deep Storage Tank (Option B) would primarily impact Canisius University and homes near the intersection of Spillman Avenue and Florida Street. The number of homes which would feel vibrations from construction of the Storage Tunnel (Option A) would include all of the ones impacted by Option A as well as homes along East Delavan Avenue, Beverly Road and Hedley Place from Jefferson to Meech Street/Pleasant Place. Thus blasting associated with Option B (the Tunnel) has the potential to be felt by a larger number of homes.

Comment 29. Are the older homes in the area going to be able to withstand the blasting associated with construction?

Response: Yes. Older homes, and all homes, would be able to withstand the blasting associated with construction related activities. The blasting associated with rock removal would be very controlled and it would be developed to avoid damage to any structures. While some rattling may occur, it is not expected to cause any structural impact on buildings in the area. A pre-construction survey would be completed for all homes that may potentially be impacted by vibrations associated with blasting. All construction related blasting work would be performed by Contractors who are certified and have expertise performing this type of work and would use methods to limit vibrations associated with blasting.

Comment 30. Will blasting cause damage to homes, such as cracks in plaster walls or foundations, in Option B (the Storage Tunnel)?

Response: Blasting from construction of either alternative should not impact homes nor cause cracks in plaster walls or foundations. The project team is currently working on a vibrations analysis and the results of this analysis are being presented in the DEIS. As of February 2025, Buffalo Sewer has selected the Deep Storage Tank as the preferred alternative for the East Delavan Sewer Improvements Project. This alternative would require less blasting than the storage tunnel and blasting would occur further away from residences.

Comment 31. What if my home is damaged from vibrations from the blasting?

Response: Blasting from construction of either alternative should not impact homes nor cause cracks in plaster walls or foundations. The project team is currently working on a vibrations analysis and the results of this analysis are being presented in the DEIS. As of February 2025, Buffalo Sewer has selected the Deep Storage Tank as the preferred alternative for the East Delavan Sewer Improvements Project. This alternative would require less blasting than the storage tunnel and blasting would occur further away from residences. A pre-construction survey would be completed for all homes that may potentially be impacted by vibrations associated with blasting. All construction related blasting work would be performed by Contractors who perform this type of work and would use methods to limit vibrations associated with blasting.

Comment 32. Will the tank pose the same liabilities to the home same as the tunnel, like are they nearby similarly or no?

Response: Vibrations from blasting due to construction for the Deep Storage Tank (Option B) would be felt at Canisius University in the vicinity of the Project and some of the homes on Florida Street. The number of homes which would feel vibrations from construction of the Storage Tunnel (Option A) would be greater since this alternative would be constructed adjacent to homes along a longer stretch of East Delavan Avenue. However, damage to structures in the vicinity of the Project as a result of construction is not anticipated for either alternative.

Comment 33. Is there going to be an alarm sounded or some device that will let people know when the blasting is happening?

Response: Yes. As is typical of this type of work, a horn or other notification would be given immediately prior to a blast. Additionally, prior notification of construction activities, including those associated with blasting, would be provided by Buffalo Sewer through various communication channels, including flyers, website updates, and other appropriate methods. This would include the anticipated schedule for and approximate timing of blasting.

Comment 34. Is the planned blasting similar to the blasting that happened when the subway train was put in? Is it not as severe as when the propane building blew up on Eagle Street because you could feel that on Winspear? I'm thinking you probably won't feel this on Bailey and Winspear?

Response: Blasting approaches and technology have advanced significantly since the construction of the NFTA subway train and it’s anticipated the future construction will be less noticeable than the previous construction.

The vibrations experienced from construction related blasting would be comparable to those generated by a passing subway or train. Construction related blasting would only be felt by residences and businesses within close proximity to the Project site associated with either the Storage Tunnel or Deep Storage Tank as indicated in the figures which are presented in the EIS. Those vibrations would not extend to Bailey or Winspear streets.

Comment 35. I'm going to assume that there's going to be an impact of rodents. And if there is going to be an impact of rodents, will it not be less at the Canisius site than it would be in homes?

Response: The Contractor would be responsible for developing a pest control plan to limit displacement of rodents into surrounding areas in addition to controlling other pests that may be present at the project site during construction. This plan would be reviewed and approved by Buffalo Sewer prior to the start of construction and monitored for its successful execution throughout construction.

Comment 36. What will be the impact on neighborhood access for the two options?

Response: For neighborhood access, there would be a period of time during which Delevan Street, between Main and Jefferson, must be closed. The primary impact on neighborhood accessibility would be concentrated within this area.

Regardless of the construction method, the majority of activities associated with construction would be confined to the area between the bank turnaround and Jefferson. This section of the road would experience an extended closure under either alternative.

<u>Cumulative Impacts from Other Projects</u>

Comment 37. Work on the East Delavan Sewer Improvement Project (EDSIP) should reference and incorporate the following road and traffic infrastructure projects and how it changes anticipated vehicular volume and circulation during the up to 5 years of construction.

- The Greater Buffalo Niagara-Regional Transportation Council's Transportation Improvement Program (TIP) Amendment #18 Complete Street Treatment on Main Street; Goodell Street to Kensington Avenue (PIN 5761.60.) For the 1.5 miles, the conversion of four lane road to two lanes with continuous center turn lane and protected bike lane, will severely limit traffic volumes when there's diversion from Kensington Expressway Rt.33 construction.
- The Region Central Project downgrading the Scajaquada NY Rt. 198 to a reconstructed Humboldt Parkway from Parkside to Delavan, will permanently push traffic into the project area.
- Reconstruction of the Kensington Expressway NY Rt. 33 Project, whatever final form that takes, will displace vehicular traffic during construction and will permanently change traffic patterns and volumes within the project area. The combined impact will certainly cause additional traffic that has to be managed by the EDSIP.

The preferred Region Central plan calls for removal of the interchange ramps at the east end of Rt 198 at NY 33. That means the ramp delivering 19,000 inbound cars daily

from 198 East to NY 33 West will be removed. This same ramp would be removed if NYSDOT is forced to remove the Kensington Expressway by lawsuit, or if the complete removal option of Rt 198 under Region Central is chosen. Even if NYSDOT prevails in the lawsuits and Region Central doesn't get implemented, when NYSDOT reconstructs the Kensington Expressway this ramp will close for 4.5 years during construction.

The EDSIP will take at least 3 and possibly 5 years (depending on which build option that is selected), starting in 2026, during which there will 2 years of road closures of the Jefferson/Delavan - Canisius College area which will load the Jefferson Business District and Hamlin Park traffic onto Main Street.

Combined with the highway changes of inbound ramp from Rt 198 E to NY 33 W that will close for at least a considerable period, and most likely be permanently closed, there will be increased traffic demand. Main Street would likely be used on a permanent basis to carry most of the 19,000 cars that daily use the I-198 to NYS Rt 33 inbound ramp.

Under the preferred Region Central plan, Kensington Avenue will deliver 28,000 cars daily to Main St at Humboldt Parkway. If half turn east (outbound) and half turn west (inbound). Main Street would likely be used on a permanent basis to carry most of the 14,000 inbound cars to be delivered daily by Kensington Avenue at Main Street. Currently, most of Main St in this area carries 12,000 cars daily. That means that together this portion of Main Street needs to carry daily:

- 12,000 Current level plus
- 19,000 New load from closed NY 198 E to NY 33 W ramp, plus,
- 14,000 New load from new Kensington Ave Region Central plan, and
- 12,000 New load from Jefferson & Delavan BSA Project detours.

This adds up to 57,000 cars daily on Main Street in the immediate project area. This is impossible with just one or two travel lanes in each direction. Carrying 57,000 cars daily on NY 5 Main Street may be possible with two lanes in each direction if the third lane is used during peak periods. Main Street currently has 2 travel lanes in each direction plus 1 parking lane in each direction. To carry 57,000 cars daily it will be necessary to use all 3 lanes in each direction for travel during rush hours. It will be necessary to prohibit parking inbound in the mornings and outbound in the afternoons.

The permanent DOT/City and BSA proposal under consideration should be modified to accommodate much more traffic instead of putting Main Street on a "road diet."

I strongly support the sewer, transit, pedestrian/bicycle and environmentally friendly goals of BSA's EDSIP. They need to be made in the context of larger project network including the Scajaquada NY Rt 198, Kensington Expressway NY Rt. 33 and Main Street infrastructure changes.

The results of the EIS work underway should be presented to the public before final EIS report is issued. The draft EIS upon which my review is presented here, is quite devoid of any substantial and robust examination of specific cultural, historic, natural and educational information. Substantial social and economic issues to the community cannot be measured nor compared if they are not identified and studied before a Record of Decision is issued.

As an example, Kensington Expressway modifications could be incorporated that would use the existing highway trench for rainwater storage, at a much cheaper cost as the blasting is minimal. Proceeding without weighing this option could result in erroneous designs requiring expensive rework. Obtaining project permits requires the lead agency to implement the Least Environmentally Damaging Practicable Alternative (LEDPA) to comply with federal, state, and local environmental laws that are ancillary to SEQRA and NEPA.

Response: Buffalo Sewer recognizes that the East Delavan Sewer Improvements Project is not the only major infrastructure project underway in the area. The project's Environmental Impact Statement (EIS) includes an analysis of cumulative impacts. This means describing how the project, in combination with other existing or future construction projects happening at the same time in the area, might affect various environmental and quality of life conditions.

Buffalo Sewer is actively working with teams from other construction projects planned for the neighborhood to understand how these projects could affect the same community simultaneously. The DEIS will estimate cumulative impacts based on publicly available information from planned projects. Buffalo Sewer is committed to disclosing potential cumulative impacts within the EIS to inform the community and identify measures that may be incorporated into the project to lessen any associated environmental impacts.

Comment 38. I support the goal of this project to help reduce Combined Sewer Overflows into Scajaquada Creek. However, I am concerned about the following:

- There are multiple projects potentially occurring at the same time in/near the project area, including 198/33 interchange changes, and complete streets for Main Street, now extending to Kensington. There appears to be no consideration of possible synergies with these projects. I strongly recommend a holistic approach be taken.

I urge the Buffalo Sewer Authority to broaden the scope options to consider other projects in the area and improve community outreach efforts

Response: The alternatives and their locations were chosen to meet Project objectives, and to eliminate the need for pumping which would add additional complexity, cost and environmental impacts to the Project. The purpose of this project is to capture the combined sewage right before it goes over the weir at SP 333 and discharges to Scajaquada Creek to catch as much flow as possible for temporary storage.

Buffalo Sewer is actively working with teams from other construction projects planned for the neighborhood to understand how these projects could affect the same

community simultaneously. The EIS will estimate cumulative impacts based on publicly available information from projects. Buffalo Sewer is committed to disclosing potential cumulative impacts within the EIS to inform the community and identify measures that may be incorporated into the project to lessen any associated environmental impacts.

Alternative Preference

Comment 39. The tunnel option is my preference because it could be designed to service a longer area or take the current combined flow to treatment once the current sewage is directed away from the former water drainage system that discharges into area water bodies of the Niagara River. This disconnection of sewage from the local water runoff, even from streets, is the reverse of the current disconnection of roof drainage and water infiltration swales from the sewer system intended to eliminate water not needing treatment from the system designed in the 1960's STPs to accommodate sewage. It appears the sewage quantity may be far less than the water runoff quantity and the water runoff system using streams may be better able to accommodate that liquid. This has been the basis of divided drainage systems in new subdivisions where sewage is separately collected to treatment.

Response: Both the Storage Tunnel and Deep Storage Tank project alternatives would be designed to hold a combined sewage volume of 1.5 million gallons.

All combined sewage stored in the tank or tunnel would eventually be conveyed to Bird Island Wastewater Treatment Plant for treatment, following a storm event. Either of the two alternatives would provide temporary storage of combined sewage, reducing the number and volume of combined sewer overflows (CSOs).

The vast majority of the sewers in Buffalo are combined sewers. Much of the sewer system was designed and constructed over a century ago. Separating the combined sewer into separate storm and sanitary sewers is one approach to avoid combined sewer overflows. The East Delavan Sewer Improvements Project takes a different approach by adding more storage to the existing combined sewer system. It provides a faster and more feasible approach to reducing CSOs than separating storm and sanitary sewers in this portion of the City. The project has been approved as part of Buffalo Sewer's Long Term Control Plan for CSO discharges.

Comment 40. Looking at this, it looks like the project Option A has a lot less impact. Why would you even consider B, or what are the benefits of B?

Response: The benefits of Option B (the Storage Tunnel) would be that the Combined Storage Facility is located within the City's right-of-way, reducing the required easements and permanent land acquisition necessary from Canisus University, on their privately owned property. However, based on discussions with the University and community feedback, as of February 2025 BSA has selected the Deep Storage Tank as the preferred alternative.

Comment 41. I support the goal of this Project to help reduce Combined Sewer Overflows into Scajaquada Creek. However, I am concerned about the following:

- The scope is already predetermined: Two options are presented, with no accommodation of other projects planned for the area. I fear the scoping has been pre-determined without sufficient community input on the options.

- I spoke with a business owner who would be directly impacted by this Project, and they had no information about either the Project itself or the street closures that would hurt the business. It appears there has not been sufficient community outreach to directly inform impacted constituents.

I urge the Buffalo Sewer Authority to broaden the scope options to consider other projects in the area and improve community outreach efforts.

Response: The Draft Environmental Impact Statement (DEIS) is now available for public review and hearings will be held where the public will be able to provide comments on the document.

Community outreach efforts began in August of 2024, and public hearings regarding the DSOW were held in October of 2024. Buffalo Sewer is working in conjunction with Clementine Gold Group to ensure community engagement in the form of council district breakfasts, community events, and through a project advisory committee of local residents and stakeholders.

General Statements

Comment 42. I just want to make one recommendation. Masten Block Coalition meets regularly and I would hope that you would take this team to the Masten Block Party and plan to present project information to that group as well.

Response: Yes, the project team attended the Masten District Stakeholders Breakfast on Saturday (10/19/2024).