

The 23-story residential tower and three-story parking garage venture now planned for the Outer Harbor violates most of the principles and policies so carefully worked out in the City's proposed new Green Code zoning and waterfront plans. And yet our Planning Board recently approved this tower with no public review of its potential impacts on the environment or on the welfare and economic well-being of the City.

Under the Green Code, new development must be consistent with the existing character of its host neighborhood. The Outer Harbor is a coastal floodplain anchored at either end by two significant wetlands: Times Beach and Tiff Nature Preserve. It provides critical spawning and nursery areas to the Lake Erie fishery, whose protection and revitalization is one of the ten goals stated in our new Local Waterfront Revitalization Plan (LWRP). It is also one of the nation's top ranking stopover sites for migratory birds due to its location on both the Atlantic and Mississippi flyways.

In short, the character of the Outer Harbor is defined by environmental services. It is our drinking water, our public access to Lake Erie, our health spa (biking, walking, fishing, exploring), and our buffer from lake effect wind, snow and flooding.

This last point may be the most important. The LWRP calls for the City to "examine precipitation records, historic high water data . . . snow melt, high Lake Erie winds, Lake Erie seiche and historic tsunamis to maximize the accuracy of flood data and risk maps." (LWRP Section III, p. 56) To my knowledge this has not been done. But anyone who has been stuck in the Outer Harbor during a winter storm knows just how risky a place it can be.

My UB graduate planning students conducted a "vulnerability analysis" of the Outer Harbor this spring, based on the area's sensitivity and level of exposure. Sensitivity is defined by limited connectivity and limited access to amenities. The Skyway experienced 156 lane closures between 2003 and 2006, many of these weather related. During extreme weather events where evacuation may be necessary, the Skyway cannot be relied upon as an evacuation route. Outer Harbor residents would need to walk 40 minutes through a heavy industrialized area to reach the nearest community center, church, or school. Lack of amenities such as police, fire stations and grocery stores increases sensitivity, especially during extreme hazard events.

Exposure is also high. A 2014 State Department of Homeland Security and Emergency Services report shows Erie County has high exposure to significant wind and winter weather events due to its proximity to Lake Erie winds, snow and seiche flooding. The Outer harbor is one of the most exposed locations to prevailing weather in Erie County.

Building a residential tower there is irresponsible to the character of the place, to its potential residents, and to the economic welfare of the City.