

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

East Side Parkways Coalition, *et al.*,

Plaintiffs,

v.

New York State Department of Transportation, *et al.*,

Defendants.

AFFIRMATION

Index No. 808702/2024

Anne “Dede” Neal Petri subscribes and affirms under the penalties of perjury as follows:

1. I am the President & CEO of the Olmsted Network. The Olmsted Network is the first and only national organization dedicated to championing parks and places and principles of Frederick Law Olmsted through advocacy, education and stewardship. Briefly stated, Olmsted was a world renowned landscape architect and his works are studied and admired around the world.
2. I certify that the attached is a statement of position of the Olmsted Network with respect to Humboldt Parkway.
3. I am advised that the State of New York takes the position that the Olmsted designed parkways in Buffalo, NY are no more than “streets with ornaments.”
4. That position reflects a lack of appreciation for the grandeur that Olmsted brought to his designs of parkways in Buffalo, NY. Based on my research and knowledge of Olmsted’s work, Humboldt Parkway was a landscaped, linear park, 200’ wide and intended for use by the community for park purposes.

5. The National Park System outlines the significance of Buffalo's Olmsted Parkways on its website (<https://www.nps.gov/frla/learn/historyculture/parks.htm>) as follows:

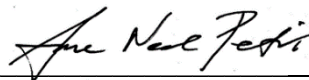
[The] system of parks and recreation grounds first clearly accomplished in Buffalo, New York, created a structure of green spaces in advance of the concentrated settlement of residential areas. **Completing this system were ribbons of public space in the form of parkways that facilitated movement through the city and served as neighborhood outdoor resting places. Usually two hundred feet wide, the parkways separated the commercial traffic of carts and wagons from private carriages and provided separate ways for pedestrians and equestrians.** (emphasis supplied).

6. On our website, www.olmsted.org, Olmsted scholar Charles Beveridge describes the Humboldt Parkway as a principal parkway project of the Olmsted firm and the Buffalo Park System and connecting parkways as a Principal Park System in the United States.

7. Buffalo is indeed fortunate to have had Olmsted's involvement in its development. The restoration of Humboldt Parkway to Olmsted's design would be an achievement of world-wide significance.

I affirm this 18th day of October, 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Subscribed in Washington, D.C.



Anne "Dede" Neal Petri