

*The NHP Evaluation of the Niagara Gorge Corridor Project, Robert Moses Parkway-North Segment, Scoping Report Presentation.*

NYSDOT PIN 5757.91

The Niagara Heritage Partnership (NHP) ([www.niagaraheritage.org](http://www.niagaraheritage.org)) found this scoping report to be biased in favor of options other than total removal in the following ways.

The Project Objectives, as written, favor parkway retention.

- 1) benefits related to total removal, elsewhere thoroughly discussed by NHP and documented by the independent study conducted by EDR were ignored.
- 2) arguments against total parkway removal that were thoroughly debunked by the EDR study were incorporated as "objectives " that can only be "met" by parkway retention.
- 3) goals and benefits of total removal proponents were incorporated as vague "catch phrases" to imply that treatments other than total removal could also provide them.

Some amplification of the above:

- 1) the potential for ecotourism as outlined by NHP, the increased Homeland Security, the potential for power plant-greenhouse--all detailed elsewhere and which we'll forward by snail mail tomorrow or hand deliver--were not acknowledged.
- 2) the EDR traffic study concluded alternative routes could easily handle parkway traffic with the parkway totally removed; yet a "Goal" of the project remains "Promote vehicle traffic patterns that minimize traffic patterns in residential areas." Translation: keep the "detour" function of the parkway.
- 3) "Promote ecotourism..." This has been a central feature of total removal and it has been repeatedly explained why attempting to attract ecotourists to hike, walk, and bicycle alongside a two-lane commuter route is a non-sell proposition: yet there that phrase is, as if merely printing those words make it feasible in the world of reality.

Nowhere in the Project Objectives do we find: to eliminate road maintenance costs for the future; to eliminate the direct, on-site contamination of the Corridor that occurs as a function of road use and maintenance (salt spreading, vehicle carbon emissions, the latter just under 232,000 tons annually by OPRHP's own calculations); to increase as much as possible the numbers of acres of wildlife habitat acres to the Corridor, which is already recognized as a Globally Significant Important Bird Area; to reduce threats to Homeland Security; to create the potential for a world-unique greenhouse with both practical, economic, and tourist-attracting capabilities (in spite of the Report's inexplicable depiction of the power plant on the front cover as if it's a contribution to the Greenway); to begin the restoration and future-creation and preservation of an historical old-growth forest; to eliminate (not "reduce") the dysfunctional detour function of the parkway, and so on.

It's clear that an honest assessment of the realities and potentials associated with the North Corridor Project is likely to have resulted in a quite different set of conclusions.

Further, when the estimated cost of total removal provided by EDR is 3.8 million, the Scoping estimate of 33 million is nothing short of preposterous. The difference of some 28 million can be found in projects such as the "Expansion of Discovery Center and Aquarium footprint," and in "new shared park road entrance to....Maid of the Mist facility." While these may be desirable projects, they have zero to do with removal, and it is dishonest to indulge in this kind of accounting. Even with this obvious slight-of-hand number juggling, the difference between total removal (the lowest estimate in spite of padding) and the much-touted Alternative 3 (by local politicians) remains 19 million. Advantage: total removal.

Of course the facts and other complexities obscured by the accounting numbers noted above beg further discussion, but we've done that previously and it's been ignored. Rather than repeat, we'll forward other relevant documents with this response: a letter to Assemblyman Ceretto; a recent Guest View (9 March 2013); a sampling of the online petition; the statement "The NHP Position re: RMP/Niagara Gorge Corridor Project: Meeting No. 4 for Representatives of Organized Groups" (27 Oct. 2012); and documentation that no road (a retained parkway) ever pays for itself, is invariably a drain on future economies, facts with which the DOT and others are no doubt very familiar.

It's worth noting, however, that the Scoping Report's failure to take into account the 4,000 + individuals who've voted for total removal (plus the 80 organizations who also support total removal) is a serious oversight, indeed. We ask that their voices be counted, so that no future report can say, as this one does, that the Phase One {removal to Findlay} is supported "by the public." These voices are a genuine expression of what potential visitors want to see along the gorge rim--a park without a commuter road.

The "public" of the Scoping Report is not comprised of those who've responded to the Niagara Heritage Partnership's proposal for total removal over the last 16 years. As we may have pointed out previously, the list of organizations and about half of the individual names (the other half we have on hard copy) are available for viewing at:  
[www.niagaraheritage.org](http://www.niagaraheritage.org)

That the MOU partners endorse Phase One is no surprise--they are all entities who share conflicts of interest regarding this issue. (The MOU was entered into prior to the Niagara River Greenway becoming a reality, so it may be bound to strictures other than that new, over-arching vision.) That the Scoping Report concludes removal to Findlay ends at a "logical termini" and has an "independent utility" (whatever that means) is a conclusion with which NHP takes issue--we believe that Phase One should be total removal to the City Line at Devil's Hole, which is our "logical termini."

What's more logical than a termini that terminates at the City's boundary? It's an additional mile of parkway removal that would permit much of the natural restoration upon which developing an ecotourism market depends; it is the portion of the gorge rim most ecologically valuable, the portion EDR recognized as the most

significant, and that which they recommended be first scheduled for parkway removal and natural restoration. Perhaps that was a moderate view; NHP believes that mile should be added to Phase One.

Relevant to this additional mile, under Project Objectives, Improve Access and Transportation, "C" is "Link Parks, communities, and attractions adjoining the NGC." Having "link parks" as an objective is clearly a goal requiring parkway retention, but it is also very close to being silly when two facts are known: 1) three State Parks are currently "linked" by that first mile of parkway north of Findlay (only two of which are accessible from it), and 2) no State Park, community, or "attraction" to which vehicle access is currently available would be denied vehicle accessibility if that additional mile of parkway were totally removed--and the same could be said of the entire length of the parkway should that be totally removed.

The objective itself, therefore, is of questionable value, unless we imagine alternative routes do not exist. The entire "Improve Access and Transportation" category is feeble when examined closely, stating the obvious (remove cones) and "remove barriers that impede access" (a given), though we suppose it had to be said. It is the NHP position that the "transportation" here is of little value and should be discarded as an objective when the road providing the "transportation" degrades the landscape, and the potentially restored landscapes, though which it runs.

Sincerely,  
Bob Baxter  
Conservation Chair  
Niagara Heritage Partnership  
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