Two years ago last month the Niagara Heritage Partnership sent in comments to the appropriate state contractor on what we saw as a deeply flawed scoping report concerning the gorge parkway--and this past March we commented again on the "Niagara Gorge Corridor Project, Robert Moses Parkway--North--Phase I, Main Street to Findlay Drive." Because none of the evidence and rationales we presented two years ago appear to have altered in the slightest what seems to be the unalterable march toward Phase One, not even the music of the march, we chose to repeat what we said two years before, with one or two additional or amplified notes.

We took the time to comment because we had the opportunity to do so, not because we believed anything additional we could say would change anything. We had, after all, advocated for a total removal option that would have provided the highest potential for environmental restoration and preservation--and presented the only option that also incorporated economic growth for the Niagara region. This option was supported by a study independent of the state; it was, however, ignored. We realize saying more now is for the historical record only, but we do so because we believe that's important.

Our remarks from March of 2013 are posted at <u>www.niagaraheritage.org</u> under the title "The NHP Evaluation of the Niagara Gorge Corridor Project Robert Moses Parkway-North Segment, Scoping Report Presentation," under Recent Postings.

Note: Two years ago, we were told that the conclusions and recommendations of the EDR study would not be considered because the study's completion date missed the scoping's deadline (by two days, we recall.) We therefore re-submitted the study for consideration this time: "Regional Economic Growth through Ecological Restoration of the Niagara Gorge Rim." These study results are also posted online.

If decisions had not already been made based on likelihood of funding, the endorsement of an MOU we postulated was outdated and compromised from the start, and other assertions made without supporting evidence, we'd have expected the following in light of EDR findings: 1) the reexamination of the "logical termini" at Findlay in favor of the City line, 2) a thorough investigation of the potential for regional ecotourism, with the methods and results made available to the public.

We further noted that with a refurbished Whirlpool, Phase One will leave the parkway-as-commuter route intact, (the detour around most of the business districts of Niagara Falls); that there's no indication in this latest "Corridor Project" that the "stakeholders" have been extended beyond the Niagara area---with the reminder that this project involves state park property, and involves a tourism base that is literally world-wide, and as such, "stakeholders" should have included the thousands amassed by NHP in favor of total removal; that aside from mentioning "promote ecotourism," and "native habitat," etc., no design element appears to facilitate that environmental function, or potential.

It's a positive that Phase One includes the removal of the overpass, for which NHP had previously argued (document on the NHP web site); given the piecemeal approach of removal, however, it's doubtful that the structural steel of that structure will be re-adapted (as we also recommended) for use in the remediation of damage caused by the NYPA access road, so that the now separated portions of Devil's Hole State Park could be rejoined. While NHP sees NYPA funding for this project altogether fitting, we also find it beyond curious that the use of Niagara River Greenway monies seem to have dropped out of the conversation. Gorge parkway removal and the restoration of natural gorge-rim landscapes as proposed by NHP couldn't be more appropriate in satisfying Greenway goals.

From NHP to all those who have supported our vision for the gorge rim over the years: to the nearly100 groups and organizations, to the Niagara Falls Business Associations, City Council, Tourism Advisory Board, all the block clubs, and to the thousands of individuals, residents and former residents of Niagara, to former tourists and those yet to come, to all those who were capable of imagining the natural environment they wanted to see in reality: thank you.

For NHP, the evidence and rationale in support of total removal was, and remains, indisputable (removal at least to the City line, as supported by the EDR recommendation that the Findlay to City line section of parkway be the first removed). It is regrettable that unspoken agendas appear to have dictated that this evidence be ignored in favor of the current action.

Sincerely, Bob Baxter NHP Conservation Chair

April 2015