

Niagara's geography is distinguished by our great falls, known the world over, and the gorge, that narrow ribbon of wilderness below the falls, stone, foliage, and river. Their stewardship has been entrusted to State Parks for well over a century, and it is to them and to the accumulated wisdom of other agencies and people to whom we appeal for the continued preservation--and the restoration--of these commonly held, internationally treasured landscapes.

The Niagara Heritage Partnership (NHP) advocates, therefore, the total removal of the gorge parkway between Niagara Falls and Lewiston, NY, for reasons that should be well-known by now, twelve years after the proposal was first made. Given that the essential characteristic of the falls and gorge is that of the natural world (all the more significant because of their proximity to surrounding cities) they should be recognized as possessing an organic unity and treated as such, their stewardship guided by the philosophical principles of Frederick Law Olmsted for the parks at Niagara, forever wild, reserved for nature. But the proposal to remove the gorge parkway is far from a whimsical notion arising from a late 1800's philosophy. It has a sound application in our contemporary world, with economic and quality of life benefits that will extend far into the future: 1) with the parkway removed, the restoration of the gorge rim's native flora would have the potential, carefully nurtured, to attract a new population of eco and heritage tourists for generations to come. 2) with the parkway removed, traffic that no longer detours the City would support the revitalization of business districts and other regional businesses and, 3) with the parkway removed, unrestricted traffic would no longer transverse the face of the power plant and travel under one end of the Lewiston-Queenston Bridge as presently occurs 24 hours each day--and so, however slight some may believe the risk to be, this threat to Homeland Security would be forever eliminated.

When all the facts, information, and opinions relative to the disposition of the gorge parkway have been gathered, it is clear that final decisions will be subjective, arising from the values embraced by those making them. The choices to be made are also clear: which has the higher value, the restoration of natural environments in an historical context that cannot be duplicated ever, anywhere on earth--or maintaining a commuter road that saves only a few minutes over alternative routes? Which should be recognized as possessing the higher value, the restoration of significant wildlife habitat in a designated Globally Significant Important Bird Area--or retaining a highway through this same area because of the false perception that it is a "scenic route" for tour busses? This is a claim made by those who fail to perceive that the very presence of tour vehicles on the gorge parkway contaminate the vistas they seek to view--audibly, visually, and by carbon emissions.

Related Points of Information

1) Presently, with the Robert Moses gorge parkway intact, there are many points of interest accessible by vehicle along the gorge: the Gorge Discovery Center (Geological Museum); the Aquarium of Niagara; the future Underground Railroad Interpretive Center; Whirlpool State Park; DeVeaux Woods State Park; Devil's Hole State Park; the Power Authority Access Road to the lower gorge; the Power Vista; Niagara University (and the Castellani Art Museum); and Art Park. These are ten points of interest in six miles. WITH THE GORGE PARKWAY REMOVED ALL OF THESE LOCATIONS WOULD STILL BE VEHICLE ACCESSIBLE.

2) There exist multiple alternative north-south routes for commuters presently using the gorge parkway: the 190, Military Road, Hyde Park Boulevard, Lewiston Road, Hyde Park--Highland Avenue to 11th Street-Portage, Hyde Park-Lockport Road. As road removal projects across the country demonstrate, commuters fan out to utilize such alternative routes. Parkway traffic counts reveal it to be "significantly underutilized," carrying, for example, only about 25 % of the traffic that Hyde Park B. does on a daily average basis. THE EXPENSE OF MAINTAINING THE PARKWAY FOR THIS LIMITED USE IS ECONOMICALLY FOOLISH.

3) With the gorge parkway gone, city residents would have access to the gorge rim, to trails for walking and bicycling, accommodating to the wheelchair user and the handicapped, through young

forests being established and long-grass wildflower meadows, and this without climbing fences and worrying about parkway traffic, or being distracted by it once there. For those who wished to arrive at the entry points to these landscapes by vehicle, that would also be possible at various locations: Gorge Discovery Center, Whirlpool, Devil's Hole.

4) Parkway removal would put hundreds of people to work (truck drivers, carpenters, ironworkers, laborers, electricians, cement finishers, pipefitters, bricklayers) and, when projects related to and made viable by removal are considered, for over a span of many years. A greenhouse constructed over the lanes currently passing over the Power Plant, for example (where heat generated by the turbines, currently released to the atmosphere, could be captured for use), is a concept that would involve public and private enterprise, a showcase for area nurseries, a research facility where native plants could be grown for gorge and gorge rim restoration, where participation of educational institutions, Niagara County Community College, Niagara University and other horticultural programs, would attract attention nationally and internationally, easily becoming a must-see tourist stop. This facility should include a restaurant, refreshment stand, and souvenir shop for hikers, bicyclists, and other tourists and visitors.

5) The claim from the Northtowns that the gorge parkway is their economic "life line," while dramatic, is an assertion unsupported by evidence of any kind. Common knowledge recognizes but one entrance to the gorge parkway north (technically three, with Findlay Drive and Devil's Hole added, but envisioning tourists utilizing these in any number is fantasy). Niagara Falls' residents who wish to drive to Lewiston, for example, unless they live within a mile of this downtown entrance, probably already use an alternate route to get there. Tour drivers undoubtedly go out of their way to use that parkway entrance because using the parkway is convenient, a detour around city streets. If they have booked a Fort Niagara tour or stop, for example, they want to get there as fast as possible. Time is money. Well, time is money to Niagara Falls, as well. Niagara Falls would like tourists to spend more time in the city. Perhaps it is time for new tours to be created that include other possibilities. Tour operators employ the fiction of "scenic route" because on the surface it sounds good and seems reasonable, and they may actually believe it themselves, but a reality check indicates it might not be so scenic after all. We suggest that tours booking for Fort Niagara or the Fatima Shrine, or Jet Boat, for examples, if the parkway were removed, would continue to do so, and these locations would continue to prosper. **ALTERNATE ROUTES EXIST FOR TOUR DRIVERS, AS WELL.**

6) The "scenic route" myth: it can be argued there are two wonderful views from the parkway and they are from the top of the Whirlpool Bridge Overpass and from the face of the Power Project itself. The top of the overpass does provide a magnificent view of the Falls themselves, the falling water framed by the Rainbow Bridge to Canada. This is a view that lasts for about fifteen seconds. The view of the gorge from the face of the Power Project is secondary to the view that can be had from Lewiston Road, running parallel just above it--the higher elevation actually providing a better view. Some of the "scenic view" fiction might be derived from the stretch between Whirlpool State Park and Devil's Hole State Park, proceeding north. Here the visitor on tour can catch through the vehicle windows glimpses of the top edge of the Canadian gorge rim as seen through trees as they ride along. This at least involves a natural scene they might expect to see at Niagara, though brief, about sixty seconds, and blurred. Imagination supplies the rest, what they have seen of the gorge from the railing at Whirlpool should the tour have allowed them some time there. If the loss of the overpass view is so crucial, NHP suggests a nearby city-street construction of a tower with an elevator and observation deck would be far superior to the fleeting view the overpass provided, giving visitors time to take photographs, and so on. **LESS THAN TWO MINUTES OF DISPUTABLE "SCENIC VIEW" AS A DRIVE-BY EXPERIENCE (DURING A TOURIST SEASON THAT LASTS ABOUT 100 DAYS OUT OF THE YEAR) DOES NOT JUSTIFY PARKWAY RETENTION.**

7) As an estimate, it costs about a quarter of a million a year to maintain the gorge parkway. This is for grass mowing, herbicide spraying, snow plowing, salt spreading, and so on. NHP respectfully requests that these costs be projected at least 50 years into the future and then be added to the cost of parkway replacement--which will eventually be necessary, a price-tag that might be in the hundreds of

millions--and then that total be compared to the estimated costs of maintaining natural landscapes. This analysis should be part of this scoping procedure. We suspect maintaining natural landscapes will be the far more economical choice.

8) The list of organizations in support of total gorge parkway removal (on the NHP website) represents over a million in membership. They are telling us what they would like to see here along the gorge rim, restored natural landscapes with hiking and bicycle trails. It is an informal survey of populations who could be directly marketed to spend time on the Niagara Frontier. (Over 4000 individuals have also signed petitions--2000+ online--in favor of total gorge parkway removal.)

9) The gap in the gorge wall, through which the Power Authority access road passes, should be bridged, restoring to the public that portion of Devil's Hole that has been amputated by it. NHP suggests that steel girders presently part of the parkway Whirlpool Bridge overpass might be reused here. Further, if Hyde Park Landfill has been genuinely remediated as it is classified, the plugs should be removed in drainage conduits and the water flow to Devil's Hole on gorgeside reestablished to nourish the botanical communities there that flourished for centuries in those moist environments.

10) The State Parks maintenance garage on the gorge rim near the Whirlpool Bridge should be relocated and the area restored to natural parkland. The public has been denied the wonderful gorge views from this location for over a half century because of this unsightly, inappropriate, and unacceptable use.

11) State Parks has documented 231,768.75 tons of carbon emissions annually from vehicles using the gorge parkway. When this is added to the residues from herbicide spraying and salt spreading used in routine parkway maintenance, that are carried by over five miles of pavement sheet-water runoff into the botanical communities of the gorge rim, gorge, and eventually the river itself, it represents a toxic assault on ecological systems--that would be eliminated with total gorge parkway removal.

12) There are questions about the readiness of State Parks to formulate policies that preserve gorge rim and lower gorge botanical populations of uniqueness and diversity as evidenced by recent rock-scaling actions threatening plants "of concern," in efforts to render inner gorge trails "safe," by the introductions of non-native species into the park system, and by attitudes that suggest ecotourism involves "getting millions of people into the gorge" (paraphrase). This approach has the potential to threaten the flora that makes the gorge plant communities special to start with and should actually be discouraged or at the very least carefully managed (According to the NY National Heritage Program, there are 14 populations of 9 species, including the state-threatened green gentian at Whirlpool State Park alone). NHP believes that embarking on the large-scale restoration made necessary by total gorge parkway removal would encourage State parks to formulate policies needed to best accomplish such a task in ways that would require cooperation with other agencies, botanists, and social scientists. This would have the potential to establish perceptions and practices that would survive administrative changes, and we therefore encourage it. **TOTAL REMOVAL OF THE GORGE PARKWAY WOULD BE A GIANT STEP IN ESTABLISHING A LEGACY WITH FAR-REACHING POSITIVE BENEFITS BEYOND THE OBVIOUS.**

13) The Old Growth Forest at DeVeaux Woods State Park is a rare marvel just a stone's throw from city streets. Many who value it see the old growth as comprised by parkway lanes, restricted to the west from normal forest-edge growth by severe lawn mowing and the pavement itself. It should be permitted, even encouraged, to move toward Whirlpool State Park where a few older trees that may have once been part of this forest still exist. Some of the new trees, by natural regeneration or restoration efforts, will be our Old Growth 170 years from now. More is required than parkway removal and that is discussed in P.M. Eckel's authoritative "Flora of DeVeaux College Woods, Niagara Falls, New York," posted on the NHP website, originally published in the *Clintonia*, Magazine of the Niagara Frontier Botanical Society, Supplement to Issue 1, January 5, 1986. Of special significance in this context is Eckel's "Trees Along the Crest of the Niagara River Gorge from Devils' Hole to DeVeaux (Whirlpool) Steps in New York State." (Also posted by NHP and at Res Botanica, a Missouri Botanical garden Web Site, <http://ridgewaydb.mobot.org/resbot/index.htm> November 7, 2004. **TOTAL GORGE**

PARKWAY REMOVAL IS A COMPONENT OF PRESERVING THE VALUABLE WOODS AT DEVEAUX AND THE INTEGRITY OF FLORA OF THE GORGE RIM.

14) Parkway removal might provide the impetus for Niagara County municipalities to explore the possibility, in cooperation with OPRHP, for the creation of topsoil creation via composting for use on the gorge rim. Cut grass clippings, leaves, wood chips, and other tree products of our municipalities, instead of taking up space in a landfill (at taxpayer expense), could be turned into soil at a central location, or perhaps some percent on site. The process would require proper scientific monitoring, testing, so that the proper PH, nutrients, absence of plant disease, pesticides, etc could be assured. Organizations such as the Soil Ecology Society or other professionals could provide help with this.

15) It should be noted that anything less than total removal (all four lanes) of the Robert Moses gorge parkway between Niagara Falls and Lewiston, New York would eliminate all of the positive benefits derived from total removal. To document that assertion more fully, further details and rationale have been included here: "No Compromise" and "Benefits Assessment: Pilot Project."

16) A road-removal initiative and restoration project of this magnitude, in a world-recognized location, would command national and international attention for years. The popular press would begin coverage, followed by special features, magazine articles, Internet notices, film documentaries and photographic records of the process, inclusion in books, scholarly articles, entries in scientific journals, original research. Olmsted devotees would have an interest, as well as ecologists, botanists, hydrologists, environmentalists, nature clubs, habitat groups, high school teachers and college professors--scores of those interested in the natural sciences and the natural world. The project would have the potential to give rise to a repeat visitor market of those who would wish to see the progress firsthand, to witness new forests being born.

Thoughtfully organized, the project would invite groups and individuals to contribute to a tree-planting fund, which would permit the sponsoring of trees or a tree, where in years to come, people would be bringing children or grandchildren to see "their tree," the tree planted in memoriam, their contributions to this restoration of the natural world.

Recently a friend asked if I could imagine the gorge rim with the parkway gone. "Can you see the young trees growing," she asked, "the wildflowers in the grassy areas, butterflies floating in the sunshine, the birds singing, and imagine the people walking through this beautiful, quiet place?"

"Yes," I said, "I can."

"Now," she said, "can you imagine us fighting to put a highway through it?"

That I couldn't imagine.

Bob Baxter
Conservation Chair
Niagara Heritage Partnership
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Enclosures:

- List of groups in support of NHP parkway removal proposal
- Benefits Assessment
- "No Compromise" by E.R. Baxter (Letter to the Editor)

These groups support the NHP parkway removal proposal:

The Seneca Nation of Indians

A

Adirondack Mountain Club, Niagara Frontier Chapter
Allegheny Defense Project

B

Bert Miller Nature Club of Fort Erie, Canada
Block Power Block Club, Niagara Falls, NY
Bridge Station Block Club, Niagara Falls, NY
Buffalo Audubon Society
Buffalo Institute of Urban Ecology, Inc.
Buffalo-Niagara Land Use Coalition
Buffalo Niagara Riverkeeper
Buffalo Olmsted Parks Conservancy

C

Cheektowaga Citizens Coalition, Inc.
Chilton Avenue Block Club
Citizens Campaign for the Environment
Citizens' Environmental Coalition
Citizens for a Green North Tonawanda
City Market Block Club, Niagara Falls, NY

D

Depew/Cheektowaga Taxpayers Association, Inc.
DeVeaux Beautification Block Club, Niagara Falls, NY

E

East Side Block Club, Niagara Falls, NY
Echota West Block Club, Niagara Falls, NY
Environmental Advocates of New York State
Erie County Environmental Mgt. Council
Eastern Hospitality Advisors

F

Finger Lakes Trail Conference
Foothills Trail Club
Friends of Niagara Falls, Ontario, Canada

G

Gluck Park Block Club, Niagara Falls, NY
Good Watch Neighborhood Block Club, Niagara Falls, NY
Great Lakes United and voting members
GREENIAGARA
Green Party of Erie County

H

Home Neighborhood Block Club, Niagara Falls, NY
Hyde Park Area Block Club, Niagara Falls, NY
Hyde Park to 39th Street Block Club, Niagara Falls, NY
Hyde Park West Block Club, Niagara Falls, NY

I

Injured Workers of New York, Inc.
Institute for Environmental Learning

J

Just Words - Niagara's Literary Forum

L

Linwood Avenue Block Club, Niagara Falls, NY

M

Main Street Business & Professional Association
Memorial Park Block Club, Niagara Falls, NY
Middle Niagara Street North Block Club, Niagara Falls, NY
Michigan Avenue Block Club, Niagara Falls, NY

N

Natural Landscapes, Ltd., Niagara Falls, NY
New York Bicycling Coalition
New York League of Conservation Voters, Erie Chapter
Niagara Avenue Block Club, Niagara Falls, NY
Niagara County Community College Environmental Task Force
Niagara County Environmental Mgt. Council
Niagara Falls Nature Club, Niagara Falls, Ontario, Canada
Niagara Falls & River Region Chapter of Wild Ones
Niagara Falls Tourism Advisory Board
Niagara Frontier Bicycle Club
Niagara Frontier Botanical Society, Inc.
Niagara Frontier Entomological Society
Niagara Frontier Wildlife Habitat Council
Niagara River Restoration Council, Ontario, Canada
Niagara Street Business & Professionals Association
Nineteenth Street Block Club, Niagara Falls, NY
Ninety-Fifth Street Block Club, Niagara Falls, NY

P

Packard Court Block Club, Niagara Falls, NY
Partners for a Livable Western New York
Pine Avenue Business Association
Preservation Institute, Berkeley, CA
Preserve Our Parks, Ontario, Canada

Q

Quality Quest Coalition of Grand Island

R

The Recumbenteers, WNY's Recumbent Riders Group
Residents Organized for Lewport Environment

S

Second Chance Wildlife Rehabilitation Center
Sierra Club - National
Sierra Club - Niagara Chapter
South & Cleveland Avenue Block Club, Niagara Falls, NY

Suffolk Bicycle Riders Association

T

Tennessee Avenue Block Club, Niagara Falls, NY

Transportation Alternatives

U

Upper Niagara Street Block Club, Niagara Falls, NY

V

Virginia Avenue Block Club, Niagara Falls, NY

W

Western New York Old Growth (Forest) Survey

Weston Avenue Block Club, Niagara Falls, NY

Whirlpool Area Block Club, Niagara Falls, NY

Wild Spirit Rehab & Release Center

Woodlawn Avenue Block Club, Niagara Falls, NY

	BENEFITS ASSESSMENT	NHP PROPOSAL	PILOT PROJECT
1	ACRES ADDED TO THE NATURAL ENVIRONMENT	300	0
2	CREATES OPPORTUNITY FOR HELPING TO REVIVE BUSINESS DISTRICTS OF NIAGARA FALLS	YES	NO
3	CREATES HIGH POTENTIAL FOR ATTRACTING ECOTOURISTS, HIKERS, BICYCLISTS	YES	NO
4	TREATS GORGE AND GORGETOP AS ORGANIC UNITY	YES	NO
5	PROTECTS NATIVE PLANTS, OLD GROWTH FOREST, AND ANCIENT CLIFF-FACE CEDARS	YES	NO
6	EXTENDS NATURAL PARK ENVIRONMENT OF NIAGARA FOR RESIDENTS AND VISITORS	YES	NO
7	ELIMINATES ROAD SALT FROM WATERFRONT	YES	NO
8	REDUCES THE THREAT OF INAPPROPRIATE COMMERCIAL EXPLOITATION	YES	NO
9	PERMITS DEVILS HOLE STATE PARK TO BE ENLARGED AND TREATED WITH RESPECT	YES	NO
10	EXTENDS THE OLMSTED VISION OF THE NIAGARA RESERVATION	YES	NO
11	CREATES AN INVITING ALTERNATIVE TO THE OVERDEVELOPED CANADIAN GORGETOP	YES	NO
12	PROVIDES WILDLIFE HABITAT FOR NATIVE BIRDS AND BUTTERFLIES	YES	NO
13	ESTABLISHES NATURAL GORGETOP FOR FUTURE GENERATIONS	YES	NO
14	ENHANCES POSSIBILITY FOR UNESCO WORLD BIOSPHERE DESIGNATION FOR THE NIAGARA GORGE	YES	NO
15	IS A RESTORATION PROJECT THAT WOULD ATTRACT WORLDWIDE MEDIA ATTENTION	YES	NO
16	WOULD ACCOMPLISH SOMETHING OF WHICH THE ENTIRE REGION COULD BE PROUD	YES	NO

No Compromise

Dear Editor:

It's been suggested that keeping two commuter lanes of the Robert Moses Parkway open from Lewiston to Findley Drive in Niagara Falls would be a reasonable compromise to the Niagara Heritage Partnership proposal for total removal of all four lanes and the restoration of natural landscapes along the gorge rim. Those making such a suggestion seem to do so from the lofty perch of being rational, of offering a solution to an issue that has created opposing camps. But while we recognize that compromise is often the best path, we should also be willing to admit that sometimes it isn't. The results of the suggested compromise need to be examined. In this case, the results would be: 1) traffic would continue to detour the city of Niagara Falls by using the parkway lanes-Findley Drive-Whirlpool route, thus failing to contribute to the city's economic revitalization, 2) the wildlife habitat (Globally Significant Important Bird Area), the potential enlargement of green space near the gorge, would not be significantly realized, 3) a major component of the NHP proposal, the development of an ecotourism destination for a new population of visitors would no longer be viable, since cycling or hiking alongside a commuter route is not highly valued by those organizations and families who seek green vacations, 4) the integrity of the gorge ecosystem would continue to be degraded by the application of road salt, herbicide, etc., 5) it would result in only 1.6 miles of the 6.5 miles of gorge rim being free of parkway, 6) the neighborhoods of DeVeaux and Fort Gray would continue to be cut off from the gorge by lanes of traffic, 7) the old growth forest known as DeVeaux Woods would continue to be an isolated and restricted woodlot bordered by parkway lanes, 8) the gorge top area at Devil's Hole State Park would continue to be a sliver of land reduced by as much as 60% by highway lanes, curbs, medians, etc., 9) the construction of a greenhouse, a glassed-in space over what are now parkway lanes across the Power Plant, with nursery and a restaurant, would be a discarded idea, 10) the idea of creating a pocket park/rest area for hikers and cyclists under the Lewiston Queenston Bridge would be useless, 11) the National Heritage Area and the International Niagara Peace Park designations, should such distinctions be earned for our region, would be less impressive without a highway-free and restored gorge rim, an emblem of our respect for the natural environment, 12) the continuing national media coverage that would be generated by such a large restoration project in a world-famous natural locale would be lost.

The reasons that gave rise to the idea of "compromise" are 1) The unsubstantiated claim that gorge parkway lanes are necessary for the business interests of Lewiston and Porter (further detailed information at www.niagaraheritage.org under "Olmsted, Thoreau, and the Parkway Issue"), and 2) The parkway saves time (about five or six minutes, actually) for commuters in an area where the average commute is among the shortest in the nation. Weighed against the many positive benefits to the region that would result from complete parkway removal and gorge rim restoration, we believe these reasons for the retention of two lanes to be insufficient. That is why the Partnership strongly rejects this so-called compromise.

Bob Baxter, Conservation Chair