



February 18, 2010

The Greenway Ecological Standing Committee:
NYS Department of Environmental Conservation
U.S. Fish and Wildlife Service
Niagara Relicensing Environmental Coalition
Tuscarora Nation
Tonawanda Seneca Nation
Seneca Nation of Indians
New York Power Authority

Dear Margaret Wooster,

This letter is in response to the Greenway Ecological Standing Committee's (GESC) 11 February 2010 letter request for a clear statement that the focus of [the] Wild Ones Niagara study "is on the historical, current, and potential ecological values of the gorge and gorge rim, not on the removal of the Robert Moses Parkway," and "consistent with [y]our mandate."

The Wild Ones Niagara focus is a fully comprehensive and genuine study on the historical, current, and potential ecological values and the economic benefits of restoring the gorge rim and all of the land within the boundaries stated in our proposal. It's an open space preservation and restoration study, not a proposal to remove the parkway.

Our proposal, "Regional Economic Growth Through Ecological Restoration of the Niagara Gorge Rim," clearly states the Wild Ones objective and intent.

Had Wild Ones Niagara wanted the Robert Moses Parkway removal to be the study, we would have submitted a transportation project to the Niagara River Greenway Commission for consistency. It is our understanding that the New York State Office of Parks, Recreation and Historic Preservation will provide an objective and comprehensive scoping process that will include the possibility of show-casing a non-motorized section of the Niagara River Greenway. In the interest of transparency, we would fully support such a decision. The Robert Moses Parkway removal, however, is not advocated for in our study. Our focus is the restoration of native plants and indigenous species and the potential regional economic benefits of open space preservation.

The clarification we are providing is an addition to Task #3, Restoration Plan. "Various scenarios regarding the future of the Robert Moses Parkway will be evaluated, including the ecological and economic benefits of the parkway absent."

To be scientific, and to meet ecological design and habitat restoration objectives, requires a professional, comprehensive, non-biased evaluation of everything within a study focus area. Tasks 4 and 5 are ecologically focused and not beyond the scope of a legitimate and genuine ecological study. That is the rationale behind hiring EDR. Their professionalism and expertise in ecological restoration is impeccable. We are enclosing a testimonial and a copy of a similar project provided by one of their clients, Cornell Plantations.

We fully intend to follow the guidelines provided in the August, 2008 New York Power Authority's (NYPA) "Land Management Plan" as submitted to The Federal Energy Regulatory Commission (FERC) as it pertains to Project Number 2216-066:

“ to protect and enhance environmental, historic, aesthetic resources, and

[to] recognize and address specific resource values, public access requirements, and the interests of adjoining landowners.”

We also anticipate following, once it's available, the "Historic Properties Management Plan" required by FERC of the New York Power Project.

Based on the above clarifications, we respectfully maintain that Wild Ones Niagara proposal is consistent with your mandate and cannot be modified to "exclude any tasks or portions of tasks" since to do so would make the study incomplete and inconsistent with the above requirements.

The only ones insisting the Wild Ones study is about "removal of the parkway" are members of the Parkway Preservation Committee and a former Niagara River Greenway Commissioner, Richard Soluri, (co-founder of the Parkway Preservation Committee) who, we believe, enlisted support from Senator George Maziarz. At our December 18, 2009 funding request presentation to the GESC at the New York Power Vista, Maziarz claimed, "we don't need another study." Both then spoke at length in opposition to the study as if it were a proposal for parkway removal. As stated above, it is not. In our opinion, they corrupted what should have been a deliberative decision-making process for a project that has the mandated Niagara River Greenway Commission statement of consistency, the required municipal sponsorship, and which has provided support letters from the City of Niagara Falls, the Town of Lewiston, and the Office of New York State Parks, Recreation and Historic Preservation. Subsequently, on January 19, 2010, at the next decision to fund GESC meeting, we overheard one GESC member flatly state he would not support funding for the project, even though we provided all the requested additional information reiterating that our project is an ecological study. Does this GESC member have a separate agenda?

We strongly believe in the legitimacy of our study proposal, in its compliance with all established guidelines, requirements, and mandates. We also believe that the denial of funding, all or in part, should not and cannot be merely arbitrary. There are simply no provisions for this in the funding process. Therefore, if the GESC fails to fund, we fully expect that decision to be accompanied, at that time, with detailed written rationales from those members who voted against the funding.

Sincerely,

Michelle Vanstrom
President

CC: EDR