

Response to Anonymous Commentary on the Thousand Island Regional Assessment Project (TIRAP) Report and SASS Designation

This is a response to the unsigned Feb 25, 2015 Thousand Island Sun full page ad that provided opinion on the recently released scenic assessment report. This report and all appendix material can be viewed at: www.scenic1000islands.com. On this site, there are links to the other two scenic inventory reports completed for the state of NY. There is also information under the News and Events section. We are writing as the volunteer steering committee for the grant project. Our names are listed on the report on the inside cover. We are supported by an advisory committee of more than 50 people. We are not a “special interest group”. Our interest from the start was to help unite river communities to obtain a special designation for the Thousand Islands. Our interest is to find ways to revitalize our area. We asked the Office of Planning and Development to help.

1. What is this program?

Information about the designation program can be found at <http://www.dos.ny.gov/opd/programs/consistency/scenicass.html>. This is a program that identifies the scenic qualities of coastal landscapes, evaluates them against criteria for determining aesthetic significance, and recommends areas for possible designation as a New York Scenic Area of Statewide Significance (SASS). The TIRAP Report was commissioned as an *inventory and assessment* of the scenic resources from Cape Vincent to Morristown that forms the basis for determining whether a coastal area is “distinctive, noteworthy or common”.

To imagine how this program might help a town with coastal boundary areas, a municipality might start with the goals contained within its comprehensive plan. For example, the town board of Hammond passed a comprehensive plan that included these goals: 1) expand local access to River waterfront, 2) develop new tourism activities, 3) determine as a community which areas need to be conserved, 4) serve as a lead agent in developing a regional recreational trail, and 5) utilize a Visual Environmental Assessment Form to ensure view sheds are properly examined when development occurs. This document can be found at: www.townofhammondny.com/uploads/documents/03.21.13.pdf. The TIRAP report provides vital data to help obtain these goals. Each municipality in the TI Region can refer to its own comprehensive plan for guidance and compatibility. In addition, Cape Vincent, Clayton, Morristown and Alexandria Bay (pending) all operate under a Local Waterfront Revitalization Program (also administered by the DOS). Within these LWRPs are provisions for Policy 24 that protects the scenic quality of the coastal boundary. Municipalities have been living under these policies for decades with no adverse effects. www.dos.ny.gov/opd/programs/pdfs/CoastalPolicies.pdf

2. How can this designation help our area?

Several of the economic visions of the NY Region 10 Economic Development Council include 1) activate tourism as a pathway to diversify our economies, 2) elevate global recognition of the region as one of the special places to visit, work and live and 3) attract and nurture the cultivation of innovative clusters in our rural communities. <http://regionalcouncils.ny.gov/content/north-country>. The TIRAP is a funded grant project that was identified by this Council as a *regionally significant priority project that aligned with the Region’s strategic plan*. We believe that grant money follows grant money.

In addition, there are two other SASS areas in the state of NY (Hudson Valley and East Hampton). Conversations with planning officials in both of them have resulted in information that the amount of tourism dollars flowing into Long Island and Hudson Valley is growing annually. According to the Tourism Bureau statistics, the TI Regional tourism dollar is shrinking.

3. What is the purpose of the report?

The intent of the report has always been to provide an inventory of our scenic resources and to analyze geological, historical and visual data in order to provide a rationale for a scenic designation. The purpose is to give quantitation to the subjective term “beauty” or “scenic”. It is *not* a marketing brochure, although we agree that contents can be used for tourism promotion. The project did not promise to end wind development in the North Country. This is not to say that data provided in the report, as well as the review of large scale development by the DOS, cannot serve as a check on other state actions within the region. *Read each of the SASS area impact assessments.* The report is to be read in its entirety, without the “cherry picking” of quotes as performed in the Feb 25th ad. After a public meeting on April 13, each town will have time to decide if they wish to be included in the application for designation. The DOS has no interest in forcing towns to participate. The DOS legal team has made that perfectly clear in writing.

4. How was the report developed?

There was criticism in the ad that the report was written by a biased author. We disagree. Dodson and Flinker, is a world renowned landscape architect and planning firm and has extensive experience in scenic evaluation; <http://dodsonflinker.com/>. Consultants used planning documents, base maps, field work, photos and video from land, sea and air, GIS data, sophisticated computer programming and input from area residents to analyze quantitative and qualitative data in order to inventory and assess the area. The methodology is described in the report (pp 5-7). The survey portion was a minor element of the evaluation. The state provides a lengthy table of standardized criteria with which to rate scenery. This is explained in Appendix E. However, the state also requires that this system take into account public input. This was measured by asking residents to rank images of a variety of Thousand Islands landscapes. The survey was a way to gauge more general preferences about scenic landscapes, which the consultants then combined with state criteria as a basis to rate areas. (Appendix A-C). The survey was advertised in newspaper ads, TV and radio spots, town newsletters, Facebook pages, organizational email lists, public bulletin boards and libraries and was completed by more than 600 respondents. The conclusion is that much of the region rises to the level of “distinctive”. Who would disagree with that?

5. How can we determine the benefits and costs of a designation?

It was never the purpose of this report to calculate the capacity of a designation to change the “value” of a community, nor to provide a cost benefit analysis of a public policy. There are two other coastal areas who elected to apply for the designation and representatives from each have communicated aspects of their experiences with us and claimed no negative events of a SASS designation. These two SASS areas told us they have been able to connect tourists to nature, invest in parks and trails, conserve the agricultural land base and biodiversity and protect their water quality. Isn't that what we want for our region? In evaluating a public policy over time, we believe that unless every event (population migration, the overall economy, changing government administration, availability of grant funds,

effectiveness of marketing firms) during the policy change phase is tracked over a long interval, the type of evaluation being demanded by those who wrote the ad is difficult and costly.

However, here are some ideas:

1. Monetary cost to municipalities: None, the report is completed. The potential benefit to municipalities: an increased probability for future regional grants and increased tourism branding.
2. Amount of increased work effort for a state or federal permitting agency: One additional check box to complete on the coastal consistency form. Amount of increased work effort for local permitting department: None, local permits have no checklist.
3. Environmental risk, none. Environmental gain: Enhanced protection of more waterfront scenic resources against large scale industrial projects.
4. Costs for proposed development inside of coastal boundary requiring state or federal permit: DOS review for scenic criteria and coastal consistency. The DOS reported that out of 1900+ reviewed projects over a decade for Hudson Valley, only 4 received a negative review (all were large scale industrial projects). Benefit of an opinion about scenic quality: Enhanced protection from large industrial projects sited along the coastal boundary.

The bottom line is that there appears to be a group of people who are angry about other recent NY state policy decisions that have nothing to do with SASS. They are making the Office of Planning and Development their scapegoat. Perhaps others are industrial developers whose projects may come under more scrutiny and they don't want this. The DOS is NOT a permitting agency, they offer OPINION. The Feb 25 ad using tactics to create fear and confusion about a designation will not lead to community cooperation – it divides us, and that is what they want. Don't let them.

Please take time to read the report for yourself. Our goal is to achieve a balance between economic development and preservation that will permit the beneficial use of coastal resources while helping our communities visualize ways to sustain their economies. We believe we would all benefit from being one of three Scenic Areas of Statewide Significance in all of NY. *Please let your officials know you feel the same.*

The Thousand Island Regional Assessment Project Volunteer Steering Committee