



*Rochester Committee  
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*RCSI Bulletin 128  
Outer Loop Alternates*

*By: Robert E. Lee  
August 1971*

THE ROCHESTER COMMITTEE FOR SCIENTIFIC INFORMATION  
P. O. Box 5236, River Campus Station  
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Metropolitan Ecology  
Bulletin #128

August 1971

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Outer Loop Alternates<sup>\*</sup>

by

Robert E. Lee

Summary

The Supreme Court has said a federally funded highway may not go through a park unless it is the best of all alternatives and then only if harm to the park is minimized. R.C.S.I. finds that there appear to be technically feasible alternatives to the route proposed by the New York State Department of Transportation (NYSDOT).<sup>1</sup> There are five alternative routes that apparently could be followed, one north of the park, one south, one in a tunnel under much of the park, and two through the middle of the park. These latter two alternatives will take more parkland, but may still be preferred by some since they retain direct access to the park from the city. These routes divide the Genesee Valley Park Golf course, which is undesirable from one viewpoint, but this permits intensive development of this (northern) portion as a family area (picnic facilities, shelters, swings, ballfields, etc.) safely separated from the golf course. All the alternatives, including the NYSDOT proposal, have advantages and disadvantages and these are listed on maps showing each route. The relative importance of intangibles such as access and availability for intensive park development must be weighed by the reader, the involved citizens groups

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\* This bulletin was prepared by an R.C.S.I. task force, Robert E. Lee, Chairman, using information supplied by the New York State Department of Transportation; Monroe County Dept. of Parks, and others.

<sup>1</sup> To fully determine technical feasibility, extensive fieldwork is required and detailed, expensive plans would have to be prepared. Rock structure would have to be investigated, sewer lines, and storm drains and so forth must be fully planned, and many such details carried through before a route can truly be considered feasible. This bulletin presents only the cursory investigation required in order to determine whether some routes can be discarded and which require further, more expensive studies.

and the courts. R.C.S.I. does not advocate any specific route, nor propose one alternative over the other. The alternatives have not been fully discussed in public, and without this information on alternative routes R.C.S.I. considers the public debate on the issue to be severely handicapped.†

Because of environmental group opposition to the proposed highway route, Rochester City Council has appointed a task force of citizens and government officials to look into the controversial project. The intention of this bulletin is to present information which will help citizens form an objective base for future action. The bulletin will first present some alternative routes for joining the two 'loose' ends of the Outer Loop and objectively give their advantages and disadvantages. It is not the purpose of R.C.S.I. to recommend one route over another, but to make the alternatives known in sufficient detail to permit the public to make an informed decision. The bulletin will secondly summarize a recent United States Supreme Court decision concerning a similar expressway-versus-park issue.

Introduction

The State's proposed route for completing the Outer Loop from Winton Road South to the Scottsville Road interchange cuts through Genesee Valley Park immediately south of the Barge Canal. With the sale of most (37 acres) of the Park north of the canal and east of the river to the University of Rochester the remaining park land becomes more important. The proposed route terminates Park Road and cuts all direct vehicular access to the park from the city, as well as taking 14.2 acres of park land. <sup>2</sup>

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† The New York State Dept. of Transportation is developing a public information report which summarizes the several studies carried out for this project during the preceeding years. They hope to make this available within the next 3 to 4 months.

<sup>2</sup> The distance from Elmwood Avenue at Park Road to the remaining park through the property sold to the University of Rochester is 0.5 miles. The distance from this point to the closest entry into the park along East River Road is 2.2 miles. This passes through the busy intersection of West Henrietta and Westfall Roads. This route may become more congested with the interchange added by the proposed state route.

R.C.S.I. quotes sufficient portions of the ruling to permit the public to judge the applicability of the ruling to the various Outer Loop routes.

### The Alternate Routes

The alternatives discussed below are based on physical specifications for other portions of the outer loop and for the rest of the interstate highway system. These establish a desired minimum turning radius of 1900 feet. The absolute minimum turning radius is 1146 feet and no curve on the main highway can be sharper than this although entry and exit roads may make quicker turns. Our alternatives generally use the preferred 1900 foot radius and use about a 1400 foot radius only where indicated on the route maps. Another requirement is that no incline can be steeper than a 5 percent grade—one where the road goes up or down 5 feet while going 100 feet horizontally. Additionally the road must have an overhead clearance of 16 feet (for trucks) and must clear any railroad by 22 feet. Normal thickness of the bridge structure itself is 6 feet so the roadway surface must be 28 feet above the railroad tracks when bridging a track.

Using these specifications some routes are impossible. For example, the Genesee River and the Penn. Railroad are too close together in most places to tunnel under one then bridge the other without too steep a slope on the highway between them. Similarly a route around the east end of the airport cannot curve sharply enough to avoid all portions of Genesee Valley Park Golf Course with the 1900 foot radius curve.

Under these design constraints all technically feasible routes have been considered. City, County and State agencies, including the County Parks Department, have been cooperative in supplying information and evaluating advantages and disadvantages.

The lengths of highway were estimated by measuring the routes with a ruler on maps with a scale of 1" = 800' which is about twice the size of the enclosed maps. The acreage involved was then estimated by assuming a right-of-way of 250 feet in all open areas. For the heavily built up area along Elmwood Avenue, a 200 foot right-of-way was assumed. Actual widths will vary since elevated sections built on still have sloping sides which extend proportionally further. The length times the assumed 250 foot width gave the assumed area which was then converted to acres. Both length and acreage estimates by these methods are probably in error by less than 10 percent. The buildings destroyed in some alternates were counted by drawing the routes with appropriate right-of-way on large scale city maps which show individual houses. The width of the heavy lines on the maps enclosed do not represent the right-of-way to scale and are intended only to show the possible route.

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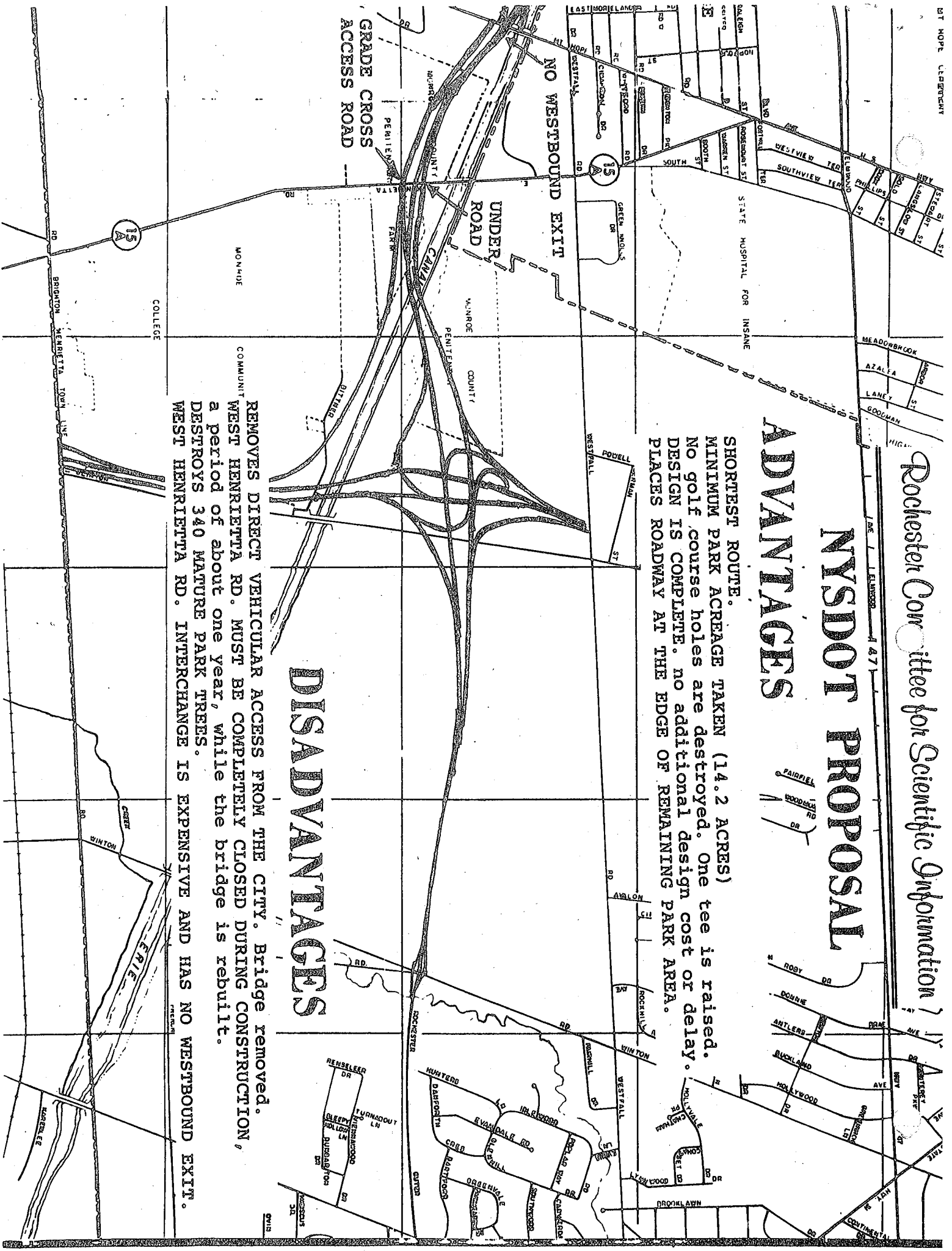
# NYS DOT PROPOSAL

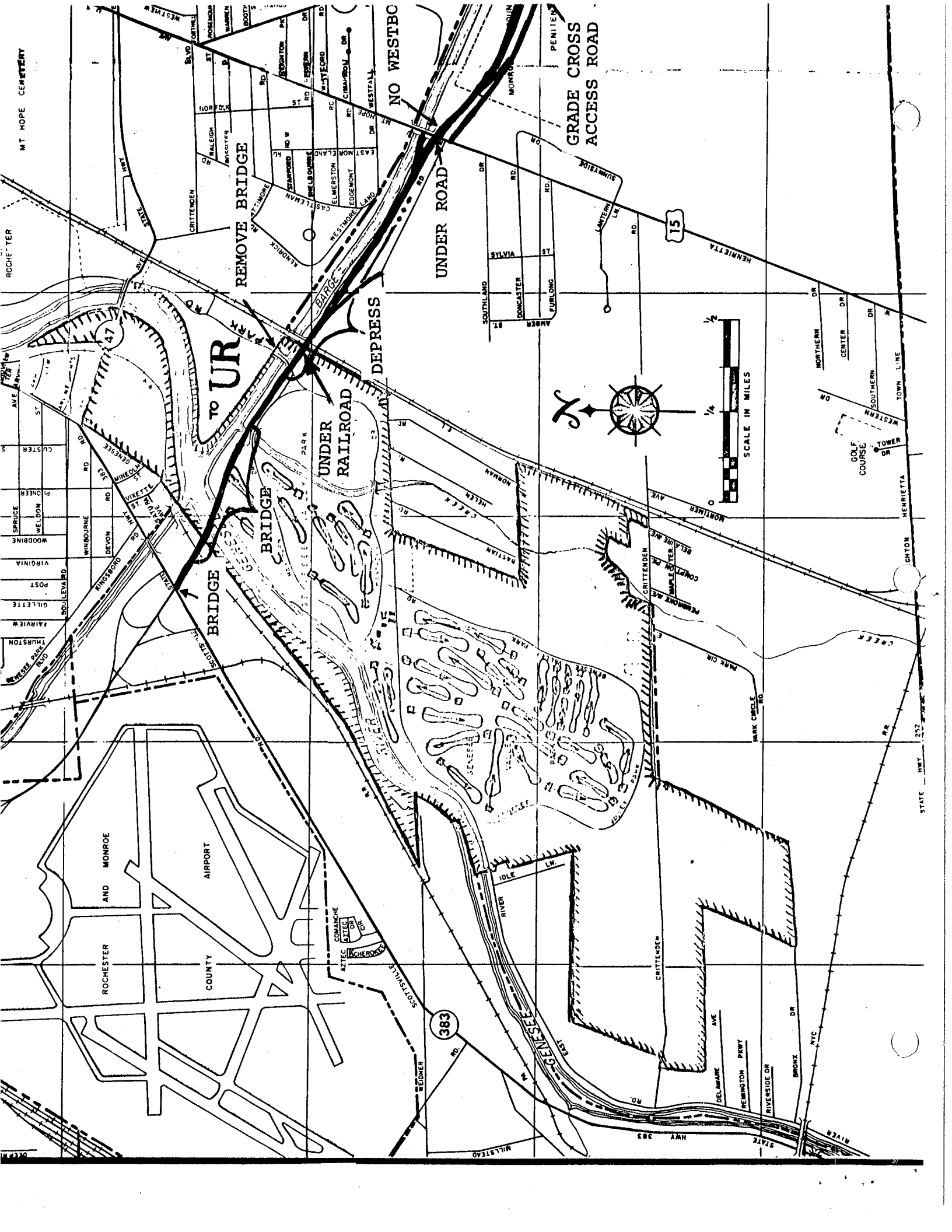
## ADVANTAGES

**SHORTEST ROUTE.**  
**MINIMUM PARK ACREAGE TAKEN (14.2 ACRES)**  
 No golf course holes are destroyed. One tee is raised.  
 DESIGN IS COMPLETE. no additional design cost or delay.  
 PLACES ROADWAY AT THE EDGE OF REMAINING PARK AREA.

## DISADVANTAGES

REMOVES DIRECT VEHICULAR ACCESS FROM THE CITY. Bridge removed.  
 WEST HENRIETTA RD. MUST BE COMPLETELY CLOSED DURING CONSTRUCTION,  
 a period of about one year, while the bridge is rebuilt.  
 DESTROYS 340 MATURE PARK TREES.  
 WEST HENRIETTA RD. INTERCHANGE IS EXPENSIVE AND HAS NO WESTBOUND EXIT.





MT HOPE CEMETERY

ROCHESTER

TO UR

REMOVE BRIDGE

UNDER ROAD

GRADE CROSS ACCESS ROAD

NO WESTBC



SCALE IN MILES

ROCHESTER AND MONROE

AIRPORT

COUNTY

383

15

STATE HWY 232

CRITTON HENRIETTA

RR

NORTHERN DR

CENTER DR

SOUTHERN DR

TOWN LINE

GOLF COURSE

TOWER DR

WESTERN DR

NORTHERN AVE

CRITTENDEN AVE

REMOVING AVE

MARKLE DR

CONYER DR

MARK CIR

PARK CIR

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It is important that the reader appreciate the nonquantitative factors involved. The University of Rochester has purchased the 37 acres of park land which lie in the approximate triangle east of the river between the Barge Canal and Elmwood Avenue. <sup>3</sup> This heavily used, easily accessible park land will become unavailable for recreation. The proposed state route along the northern edge of the remaining park dead ends the park road by removing the bridge over the Canal and hinders access to the park from the city. <sup>4</sup> Some groups feel a more southerly route which preserves access from the city is preferable even if it takes more park land. Some even feel division of the park by a more southern route would be advantageous since it again isolates, from the golf area, a section of park which can be intensively developed as was the area sold to the University. <sup>5</sup> The various alternative routes, therefore, cannot be compared solely on the basis of quantitative measures such as added length or park land consumed.

<sup>3</sup>The University of Rochester bought this land in 1969 from the City of Rochester for \$432,750. In exchange for the lost land the U. of R. sold to Monroe County Parks Department, 180 acres of open land, some marshland, at the southern end of Genesee Valley Park for future expansion. The county paid the U. of R. a sum of \$322,700 for this land.

<sup>4</sup>The City still owns the park road but this will be cut at the Barge Canal in the NYSDOT'S outer loop proposal. This loss of access to the park from the city is part of the proposal, but is not technically required. The outer loop could be bridged by Park Road.

<sup>5</sup>Some 200,000 golfers a year use Genesee Valley Golf Course and any route which cuts two or more holes, or which splits off sections of the course, will render 9 of the 36 present holes unusable. A complete hole takes \$14,000 to replace, exclusive of land acquisition cost. Although the county operates the park, the ownership is vested in the city. Money paid by State and Federal Government for the highway right-of-way may pay for only the actual land taken, with no allowance for the remaining holes rendered unusable. In any event, the money would presumably be paid to the owner, the City, rather than to the County. Arrangements might, however, be made to make these funds available to the County Parks Department for use in the park.

There is no data available on the number of persons presently using the area sold to the University which could be replaced by a split-off northern portion of the park. Consequently, no comparison can be made between the number of persons accomodated by the park when intensively redeveloped and the golfers presently accomodated.

Some alternate routes are shown on following maps. Each map consists of two sheets with some overlap. The reader can tape or glue these into a single map. The actual highway will be a divided highway everywhere but a single heavy line is used to show the route in most portions. Occasionally lines are shown for each direction and/or each entry or egress when this seemed desirable. Generally such details have been omitted in the interests of clarity.

### South of the Park

Since any roadway through Genesee Valley Park has been regarded as undesirable by many groups, including the Supreme Court, consideration was given to avoiding the park completely. Due to the long extent of the park in a north-south direction, it is very difficult to avoid it completely. To go entirely around the southern end while maintaining the desired criteria given above requires the route to abandon the segment adjacent to the airport and swing widely west along the north side of the airport, proceed along the western boundaries and then cross the river south of the airport. Further difficulties develop in trying to connect this route with the existing loop at Winton Road since Monroe Community College, groups of apartment complexes and areas of commercial and industrial development lie in the path. All government spokesmen and most outside sources which we consulted agreed that this route would be both expensive and undesirable. Most felt that it would not truly serve as an outer loop even if it were built since the circuitous route would prompt people to not follow the loop along this segment. Such an alternative route is, therefore, not shown on any maps and the detailed advantages and disadvantages are not given.

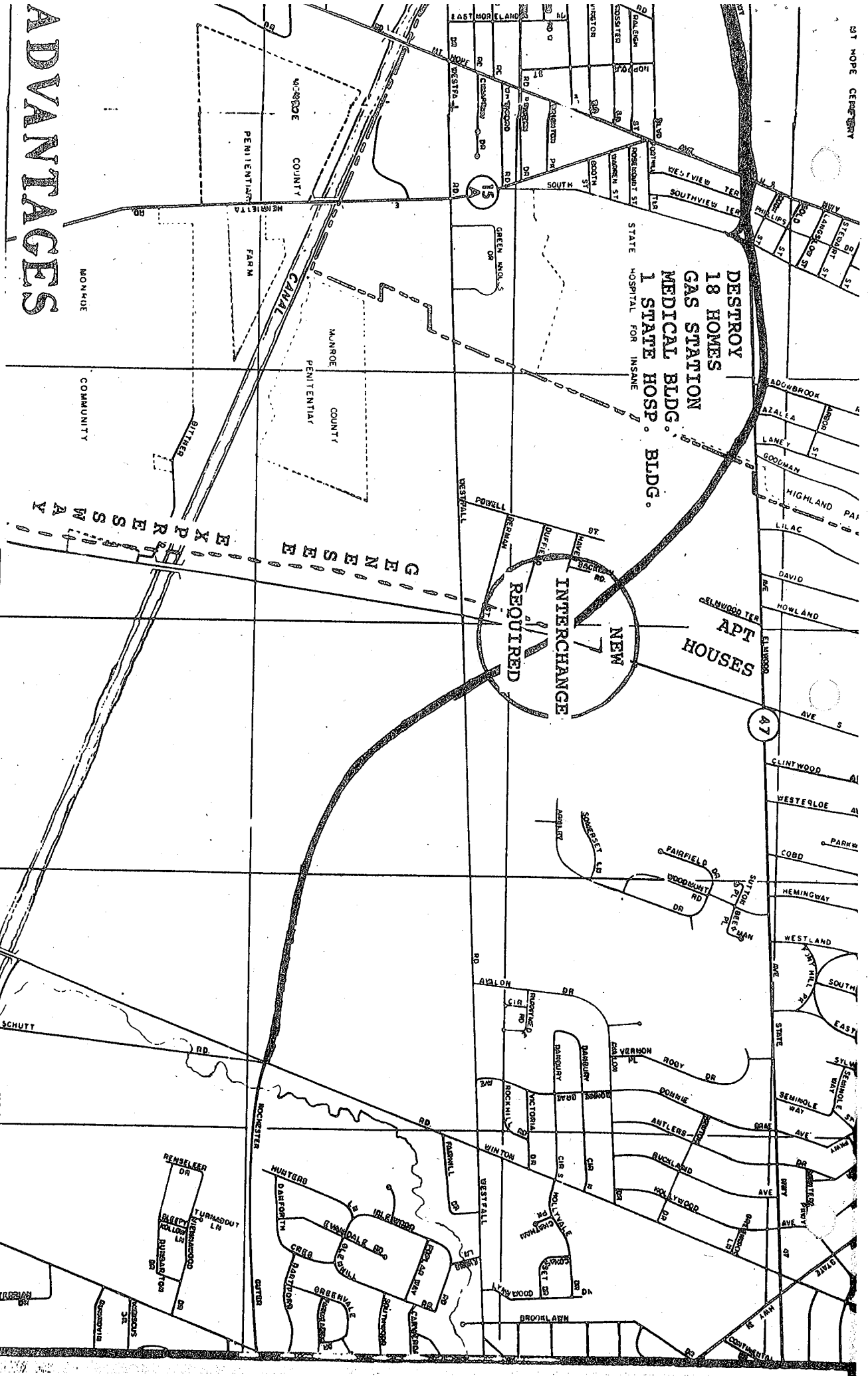
### Elmwood Avenue Alternate

A route essentially along Elmwood Avenue, which takes an absolute minimum of park land, is shown on the map labeled Elmwood Avenue Alternate.

### Tunnel Under Park

It is apparently feasible to build a tunnel instead of a bridge. The tunnel could follow the bridge alignment preserving the rest of the route plans and this alignment is assumed in the following discussion although others are possible.





# ADVANTAGES

PARK LAND IS TAKEN.

Park land is taken to widen Elmwood Avenue on the north side unless 12 homes are taken to widen between Plymouth Avenue and the River.

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## ELMWOOD AVE ALTERNATE DISADVANTAGES

TRAFFIC IS BROUGHT TOWARD CONGESTION.

Elmwood Avenue is already congested. This alternate would add the outer loop traffic to this. The route would have to handle at least 60,000 cars a day by 1990 and therefore could not have any grade crossings or traffic signals.

HOUSING DESTRUCTION IS LARGE.

East of the River this route would destroy 18 houses, 1 Medical Bldg., 1 Gasoline Station and 1 (old) State Hospital Bldg. It would pass very close to other hospital buildings and the Townhouse Motel. West of the River the least destructive route would destroy 60 more houses and cut across Scottsville Rd., Pioneer St., Winbourne and Devon and Kingsboro Roads and Genesee St. extension. A more direct route, taking the entire block between Winbourne and Devon Roads, takes 86 homes.

Neither of these counts of destroyed houses has made any allowance for interchanges since greater flexibility in their curvature makes their placement harder to predict. Therefore THESE ARE MINIMUM COUNTS. INTERCHANGES MUST INCREASE THE HOUSING DESTRUCTION since grade crossings and lights would prevent the route from handling the required total traffic volume.

PROBLEMS DURING CONSTRUCTION.

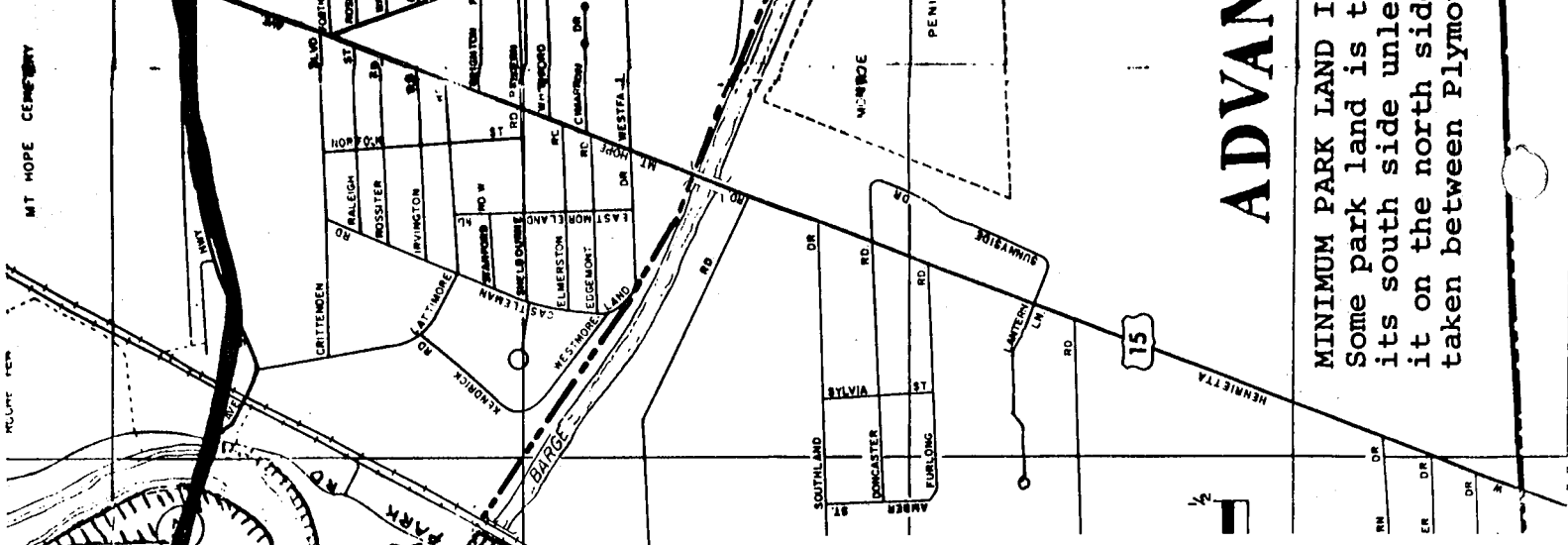
Traffic must be accommodated while the new route is being built. There are no nearby routes which can take the diverted traffic.

BARRIER BETWEEN CITY AND PARK.

The park land west of the river is also intensively developed, containing the boathouse, ice skating rink, and swimming pool as well as baseball, football, and soccer fields. The highway would have to be elevated to permit access to the park.

A NEW INTERCHANGE IS REQUIRED.

Although some advocate terminating the Genesee Expressway at the outer loop, an interchange with the expressway coming from the south would still be required.



ADVANCE

MINIMUM PARK LAND IS  
Some park land is taken  
its south side unless  
it on the north side  
taken between Plymouth

A tunnel is more expensive to build (\$29 million) than the bridge route (\$20 million) according to our calculations.<sup>6</sup> A tunnel may also be more expensive to maintain due to pumping and ventilation costs but this may be partially offset since protection of the road surface avoids damage due to freezing and salting thus prolonging life and reducing potholes.

Some area of the park will be destroyed even in a tunnel route. The true tunnel would require no surface digging or destruction but the access would be in a cut, dug from the surface and not recovered. True tunnel construction is done in solid rock which is capable of supporting itself despite the presence of the bored hole. The proposed bridge could be replaced with a true tunnel through the bedrock under the Genesee River. This tunnel would consist of two separated tubes so that the solid rock between the tubes could support the overhead mass. This separation forces a very wide cut in the excavated but unfilled approaches. A 400 foot right-of-way would be needed at the tunnel entrance (approximately at the bridge end between Red Creek and Park Road on the NYSDOT Proposal map.) This would then narrow to 250 feet at the park

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<sup>6</sup>The NYSDOT feels the tunnel costs would be substantially higher, possibly even many times more expensive than is indicated by these figures. These estimates are extrapolations based on costs of tunnels recently dug in Washington D.C. and in West Virginia. These extrapolations indicate that the actual tunnel cost is lower (\$10 million) than that of a bridge of the same length (\$15 million) but this is misleading. The access to the tunnel entrances must be excavated at substantial cost. The tunnel cost in the text includes the tunnel itself, all excavated approaches and bridges required for the tunnel, and also includes the large additional costs of pumping and ventilation equipment.

The bridge cost in the text includes, besides the structure, a matching length of approach road, the Scottsville Road bridge which the tunnel avoids, and landscaping costs under the bridge. Thus the figures represent total costs from where the routes depart from the existing roadway in the Scottsville interchange to a point where both become identical in the plans.

These extrapolations were done assuming 20 feet of bedrock between the tunnel roof and the sediment under the Genesee River would give enough strength to form the tunnel roof. If test borings indicate that this rock is not sufficiently strong then greater tunnel depth would be needed and the excavation costs of the approaches would increase rapidly. Greater depth also causes the approach slopes to become steeper and at some depth the tunnel might become completely impossible.

boundary by the railroad track. The NYSDOT bridge route would need only 200 feet at its end (same point as the tunnel end) widening to 250 feet at the boundary. This tunnel alternative would have the roadway in a deep (about 60 feet) cut passing the Park Road location so Park Road could be maintained by a surface level bridge. The cost of a Park Road bridge is not included in either the tunnel cost or the NYSDOT Bridge costs.

No map of this route is shown since the route is essentially identical to the NYSDOT proposal. The bridge would be changed to a tunnel, preserving the area under the bridge,<sup>7</sup> but the approaches would be wider. Approximately the same total park land would be taken.<sup>8</sup> The land taken would be in a less developed area, however, Park Road could be maintained to provide city access and the canal would not be separated from the park in the half closest to the river. As disadvantages are the additional costs and the danger of having a cut 60 feet deep, or more, in a park frequented by children.

#### Crittenden Road Alternate

This route, using sharper (1400 foot radius) but acceptable curves, cuts through the golf clubhouse but preserves all the holes. It may be possible to go under West Henrietta Road, but NYSDOT feels the land is too low to allow draining of an underpass. The route is thus shown bridging West Henrietta with consequent built-up right-of-way approaching it. If underpassing is possible the route would be in a cut through the backyards along Furlong Road, which is less visible and somewhat quieter.

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<sup>7</sup>In a true tunnel operation this area would be preserved, including the mature trees. The NYSDOT feels the rock may be too weak for true tunneling and the process would actually involve digging and then covering the tunnel. This "cut and fill" would destroy the trees although the area would return to parkland after the construction was complete. This cut and fill would not go deeply under the river and would not involve the deep, dangerous cut as an approach. We have been able to get no cost estimates for this method.

<sup>8</sup>The "cut and fill" referred to in Footnote 7 would not need the wide approaches to allow sloping the banks to the required depths nor the distance between tubes so the right-of-way would be the normal 200-250 feet and the park land taken would be reduced.

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# CRITTENDEN ROAD ALTERNATE

## ADVANTAGES

NORTH SECTIONS OF PARK ACCESSABLE FROM CITY.  
PRESERVES PARK ROAD.  
POSSIBLE BETTER AND LESS EXPENSIVE INTERCHANGE WITH WEST HENRIETTA ROAD.  
USES SHORTER BRIDGE.

ALREADY

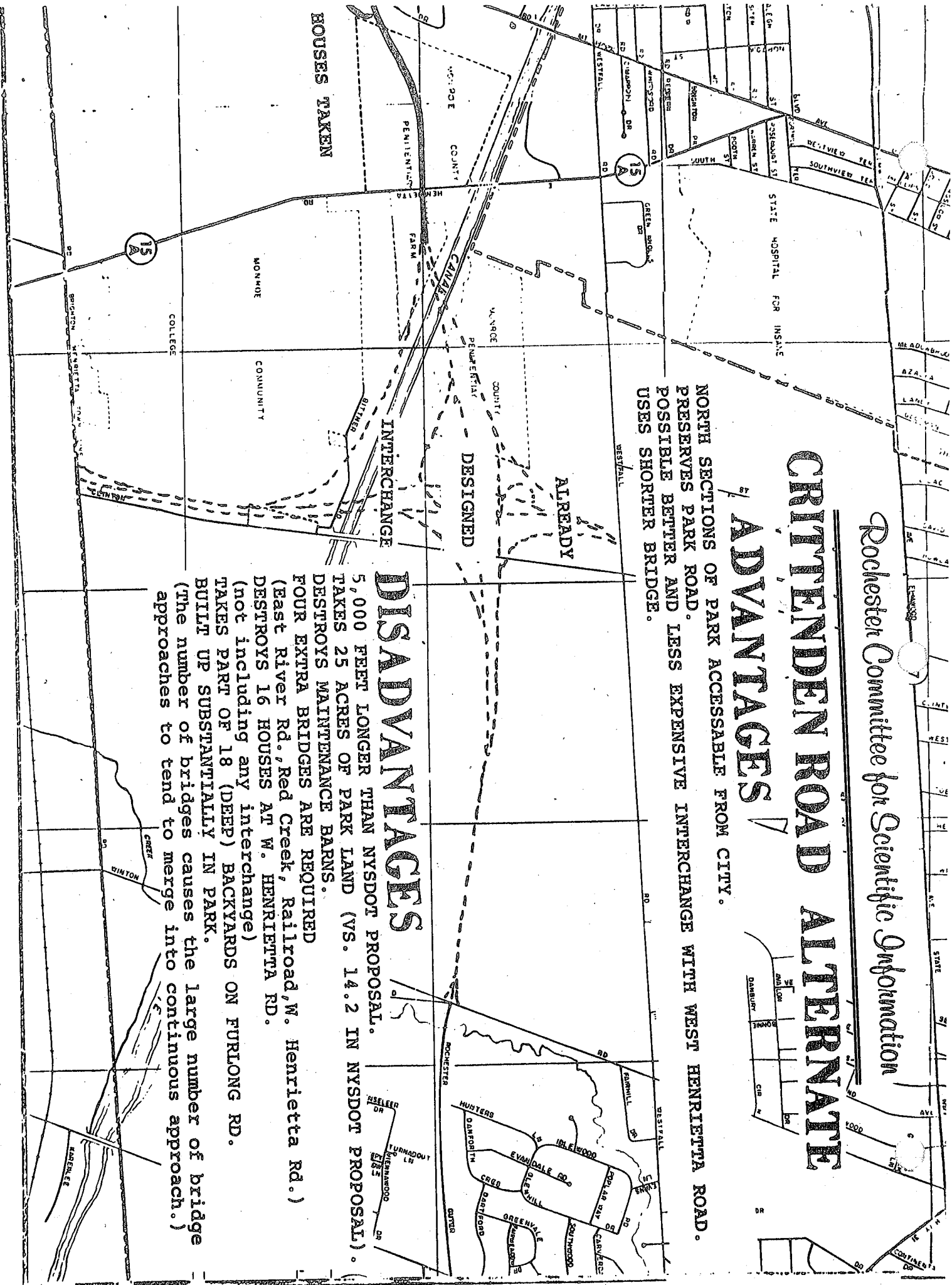
DESIGNED

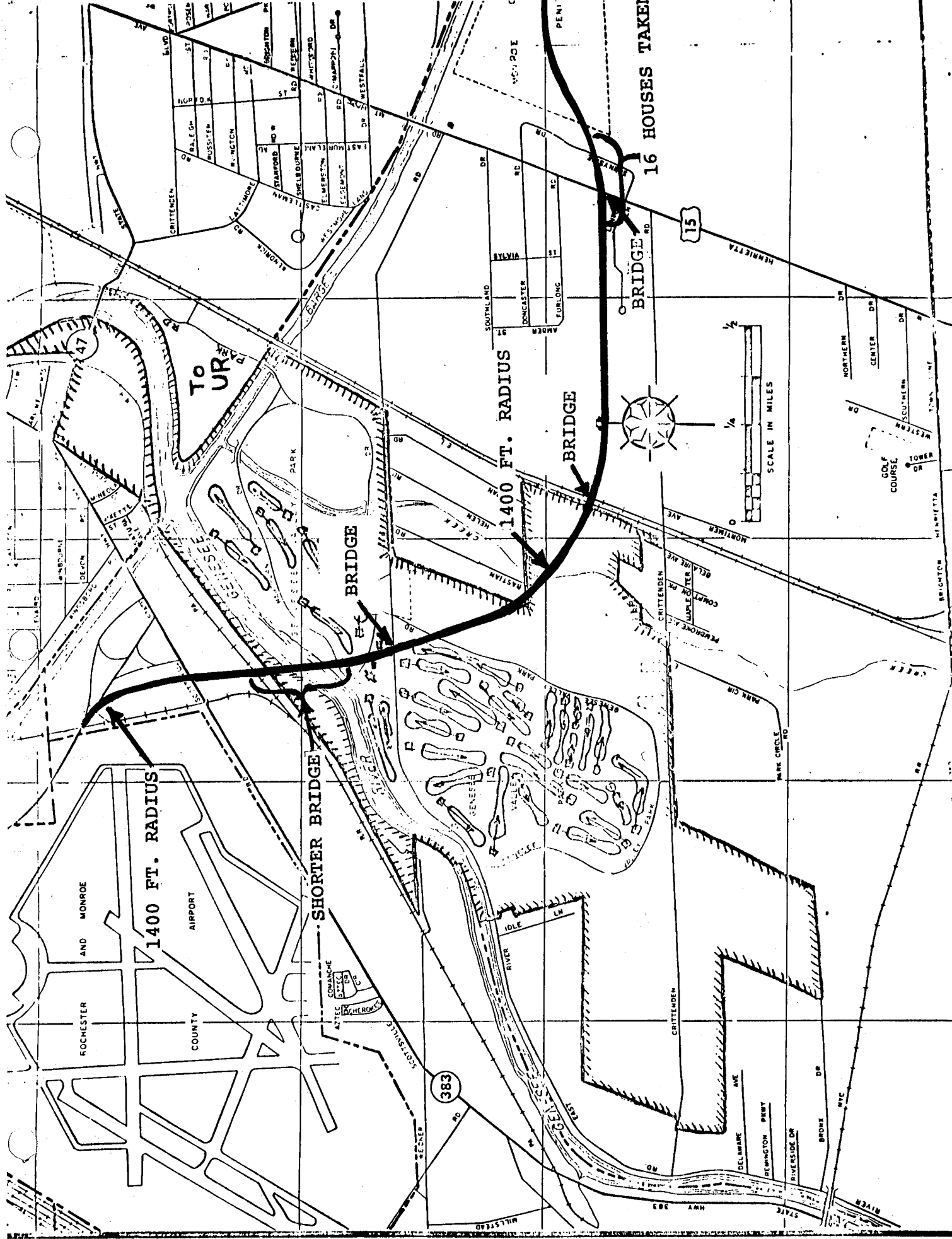
INTERCHANGE

HOUSES TAKEN

## DISADVANTAGES

5,000 FEET LONGER THAN NYS DOT PROPOSAL.  
TAKES 25 ACRES OF PARK LAND (VS. 14.2 IN NYS DOT PROPOSAL).  
DESTROYS MAINTENANCE BARNS.  
FOUR EXTRA BRIDGES ARE REQUIRED (East River Rd., Red Creek, Railroad, W. Henrietta Rd.)  
DESTROYS 16 HOUSES AT W. HENRIETTA RD.  
(not including any interchange)  
TAKES PART OF 18 (DEEP) BACKYARDS ON FURLONG RD.  
BUILT UP SUBSTANTIALLY IN PARK.  
(The number of bridges causes the large number of bridge approaches to tend to merge into continuous approach.)





1400 FT. RADIUS

SHORTER BRIDGE

BRIDGE

1400 FT. RADIUS

BRIDGE

16 HOUSES TAKE!

15



ROCHESTER AND MONROE

AIRPORT

COMANCHE AT-LEC COMPANY

383

303

GOLF COURSE

TOWER

### East River Road Alternates

Route A uses the desired 1900 foot radius of curvature, cuts four holes of the golf course and isolates four more holes. Another alternate, route B, with sharper, but acceptable, 1200 foot radius of curvature curves in two places preserves all the golf course although some might need some moving. This B route goes further into the belt of wooded land.

### The Overton Park Case

The Supreme Court case is a landmark in the fight for the preservation of parkland in the face of expressway builders. On March 2, 1971, the U.S. Supreme Court overruled a Lower Court decision which allowed Interstate 40 to cut through Overton Park in Memphis, Tenn. The Supreme Court ruled that the lower courts had failed to explore sufficiently whether the Secretary of Transportation heeded park-protection provisions recently added by Congress to federal highway law. These provisions prohibit federally financed highway projects taking park land "unless there is no feasible and prudent alternative" or unless they "include all possible planning to minimize harm" to affected parks.

The Supreme Court, in a decision written by Justice Thurgood Marshall, for himself and five other justices, sent the case back to the lower court, the U.S. District Court for the Western District of Tennessee, for further proceedings. This meant that the District Court must review the case, basing this review on the full administrative record that was before the Secretary of Transportation at the time he made his decision to approve I-40 through Overton Park. The construction of the highway has since been stopped by the District Court pending a finding from the Department of Transportation that there are no alternatives to the use of the park for the highway project.

The Supreme Court said that the lower court's review had been based on litigation affidavits which were not the whole record and were an inadequate basis for review. The Supreme Court also said that, in view of lack of formal findings, the Court may require the administrative officials who participated in the decision (to build the expressway through the park) to give testimony explaining their action or require the Secretary of Transportation to make formal findings. The court action was brought by Citizens to Preserve Overton Park, Inc., against John Volpe, Secretary of Transportation.

Key passages quoted from Justice Marshall's decision follow.<sup>9</sup>

"The growing public concern about the quality of our natural environment has prompted Congress in recent years to enact legislation designed to curb the accelerating destruction of our country's natural beauty. We are concerned in this case with § 4(f) of the Department of Transportation Act of 1966\* and § 138 of the Federal-Aid to Highway Act of 1968.\* These statutes prohibit the Secretary of Transportation from authorizing the use of federal funds to finance the construction of highways through public parks if a "feasible and prudent"\* alternative route exists. If no such route is available, the statutes allow him to approve construction through parks only if there has been "all possible planning to minimize harm"\* to the park.

Petitioners, private citizens as well as local and national conservation organizations, content that the Secretary has violated these statutes by authorizing the expenditure of federal funds\* for the construction of a six-lane interstate highway through a public park in Memphis, Tennessee. Their claim was rejected by the District Court, which granted the Secretary's motion for summary judgment, and the Court of Appeals for the Sixth Circuit affirmed.\* After oral argument, this Court granted a stay that halted construction and, treating the application for the stay as a petition for certiorari, granted review.\* We now reverse the judgment below and remand for further proceedings in the District Court.

Overton Park is a 342-acre city park located near the center of Memphis. The park contains a zoo, a nine-hole municipal golf course, an outdoor theatre, nature trails, a bridle path, an art academy, picnic areas, and 170 acres of forest. The proposed highway, which is to be six-lane, high-speed, expressway,\* will sever the zoo from the rest of the park. Although the roadway will be depressed below ground level except where it crosses a small creek, 26 acres of the park will be destroyed.

In April 1968, the Secretary announced that he concurred in the judgment of local officials that I-40 should be built through the park. And in September 1969 the State acquired the right-of-way inside Overton Park from the city.\* Final

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<sup>9</sup> 91 Supreme Court Reporter, page 814 (1971).

\* We have omitted references contained in the decision.



# EAST RIVER ROAD ALTERNATE

## ADVANTAGES

NORTH SECTIONS OF PARK ACCESSIBLE FROM CITY.

PRESERVES PARK ROAD.

SHORTER BRIDGE OVER THE GENESEE RIVER.

COMPLETE INTERCHANGE WITH WEST HENRIETTA ROAD

providing entry and exit in both directions and

still less expensive than NYS DOT proposed

interchange which has westbound entry over canal.

WEST HENRIETTA ROAD NEED NOT BE CLOSED although

some houses would be destroyed to provide room

for detour during construction.

EXCAVATION VOLUME IS SIMILAR TO STATE PLAN so the

fill generated will be about the same. This is

planned for use in the low area west of Clinton

Avenue occupied by the interchange.

## DISADVANTAGES

Route A:  
1,000 FEET LONGER THAN NYS DOT PROPOSAL.

TAKES 19.9 ACRES OF PARK (VS 14.2 in NYS DOT PROPOSAL)

CUTS 4 HOLES OF GOLF COURSE but preserves wooded

buffer strip north of East River Road.

Route B:  
2,000 FEET LONGER THAN NYS DOT PROPOSAL.

TAKES 24 ACRES OF PARK.

TAKES MORE OF WOODED AREA (but preserves golf course

although some holes may need moving).

ROUTE B HAS SHARPER 1200 FOOT RADIUS CURVES.

Both Routes:

CURVED BRIDGE is about 10% more expensive

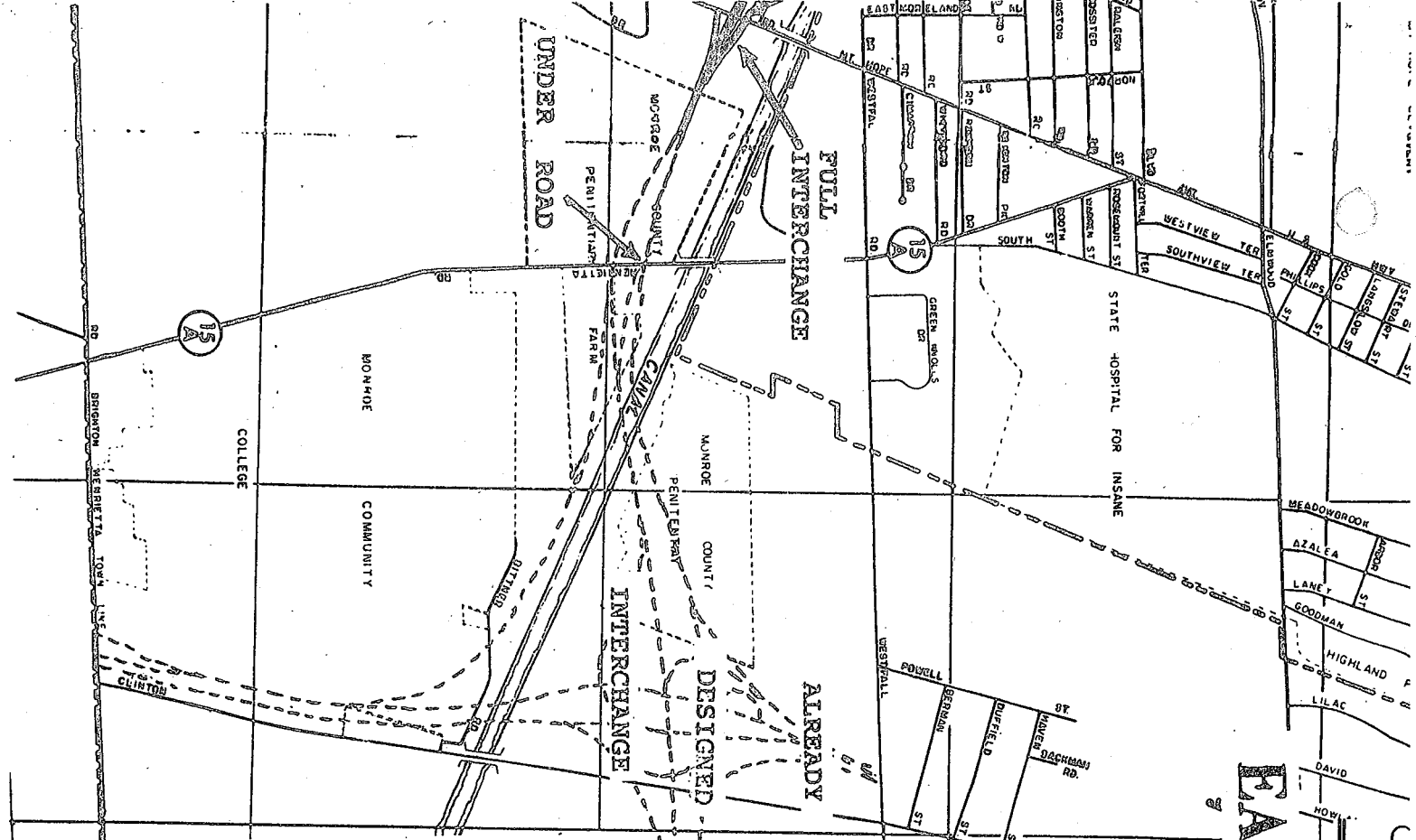
TWO MORE BRIDGES (Red Creek, East River Rd.)

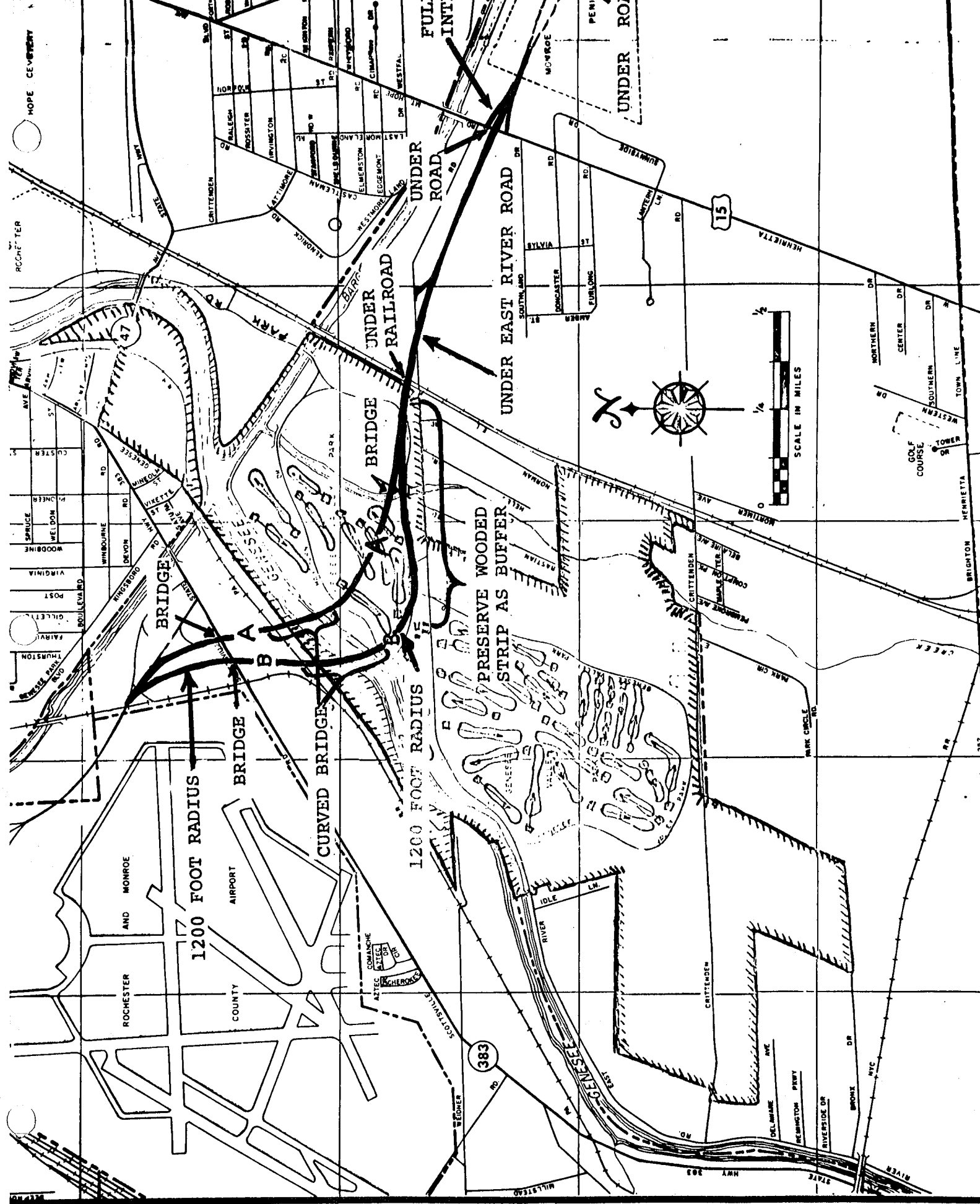
BUILT UP IN PARK for bridge approaches of

the river and red creek bridges and built up

above flood levels in remaining area near golf

course.





ROCHESTER

HOPE CEVRENTY

AVE

SPRING

WOODBINE

WINDBORNE

ROCHESTER

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ROCHESTER AND MONROE

1200 FOOT RADIUS

AIRPORT

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CURVED BRIDGE

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COMANCHE

1200 FOOT RADIUS

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PRESERVE WOODED STRIP AS BUFFER

BRIDGE

UNDER RAILROAD

UNDER ROAD

UNDER EAST RIVER ROAD

FULL INTY

UNDER ROA

15

1/2

1/4

SCALE IN MILES

NORTHERN

CENTER

SOUTHERN

TOWN LINE

GOLF COURSE

TOWER

BRIGHTON HENRIETTA

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approval for the project - the route as well as the design - was not announced until November 1969, after Congress had reiterated in § 138 of the Federal-Aid Highway Act that highway construction through public parks was to be restricted. Neither announcement approving the route and design of I-40 was accompanied by a statement of the Secretary's factual findings. He did not indicate why he believed there were no feasible and prudent alternative routes or why design changes could not be made to reduce the harm to the park. . . .

Section 4(f) of the Department of Transportation Act and § 138 of the Federal-Aid Highway Act are clear and specific directives. Both the Department of Transportation Act and the Federal-Aid to Highway Act provide that the Secretary "shall not approve any program or project" that requires the use of any public parkland "unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park.\* This language is a plain and explicit bar to the use of federal funds for construction of highways through parks - only the most unusual situations are exempted. . . .

Congress clearly did not intend that cost and disruption of the community were to be ignored\* by the Secretary.\* But the very existence of the statute indicates that protection of parkland was to be given paramount importance. The few green havens that are public parks were not to be lost unless there were truly unusual factors present in a particular case or the cost or community disruption resulting from alternative routes reached extraordinary magnitudes. If the statutes are to have any meaning, the Secretary cannot approve the destruction of parkland unless he finds that alternative routes present unique problems."

In conclusion R.C.S.I. wishes to caution the reader again that this bulletin does not purport to be a detailed analysis of any route. More disadvantages might be discovered for any route during further study. This bulletin serves only to provide information on which to base a decision as to which, if any, route or routes merit the time and expense of further study.

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\* We have omitted references contained in the decision.