



December 17, 2014

Open Space Conservation Plan  
625 Broadway  
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Parks & Trails New York (PTNY) registers its overall support for the 2014 New York State Open Space Conservation Plan. We applaud Governor Cuomo, Commissioner Harvey and Commissioner Martens for their work to release an updated Plan for New York State. The Plan rightly identifies the urgent need to connect all New Yorkers to outdoor recreational opportunities in public lands; to take steps to address climate change; to ensure clean water, air and land for public health and a vibrant economy; and to preserve our natural resources and cultural heritage. We are pleased that regional advisory committees made up of local citizens have helped formulate the Plan and determine priorities for natural and cultural resource preservation in the state.

Following are our comments and suggestions on this very comprehensive plan but we wish to begin by highlighting our highest priority recommendations

- **Increase the budget for NYSOPRHP and NYSDEC operations so that our state lands can more fully realize their potential as economic engines for local communities, and OPRHP and DEC can make progress towards achieving the goals in the Open Space Plan.**
- **Continue an annual investment of \$90 million to address the existing backlog in state park capital needs within a ten-year period time frame.**
- **Close the Gaps and complete the 360-mile Erie Canalway Trail by the Erie Canal bicentennial in 2017.**
- **Actively develop a plan for creation, design, maintenance, and promotion of a comprehensive, interconnected statewide system of multi-use trails, spearheaded by a statewide task force.**
- **Support the park and trail not-for-profit organizations capacity grants program.**

### **Promoting Outdoor Recreation**

- Launch an extensive marketing effort.  
Under the Governor's leadership, New York has clearly expanded and enhanced its marketing of the state's natural and recreational resources, including the recent summer I Love NY tourism ads. The Office of Parks, Recreation and Historic Preservation (OPRHP) has also engaged in more frequent and successful marketing efforts, for example launching a free phone app, virtual tours of its campgrounds, and Cyber Monday deals. Much more could be done, however, to promote the state's magnificent outdoor resources for passive and active recreation.

The successful I Love NY brand could be better linked with our state parks and historic sites and trails as well as Department of Environmental Conservation (DEC) and NYS Canal Corporation lands. An “I Love NY Outdoors” campaign, for example, would raise the visibility of the state’s system of public lands, increasing visitation, which in turn would bring in more money for their operation. Most New Yorkers and visitors to our state do not distinguish between lands owned by OPRHP and those by DEC and the Canal Corporation. An extensive marketing effort should be launched that markets OPRHP, DEC, and Canal Corporation lands together. Plus greater cooperation between state agencies means greater operations efficiency. This campaign should include a single website that features an interactive map of all of the state’s outdoor recreation resources. The state should also increase regional marketing efforts to promote local parks, trails and other outdoor resources in the same region. All marketing efforts should be inclusive and appeal to diverse populations.

- Make parks, trails, and other resources welcoming and accessible.

New York should continue its efforts to make its parks and trails accessible to people with different sensory and mobility challenges. Evaluation of parks and trails using the Universal Trail Assessment Process (UTAP) can provide trail managers with the information they need to understand what changes could be made to make facilities more accessible to persons of all ages and abilities. In addition, UTAP assessments yield data on multiple aspects of accessibility that can be included on signage and on the interactive map mentioned above. By doing so, persons will have the information they need to make their own decisions about whether a trail or other outdoor resource meets their needs. Some DEC and OPRHP personnel are already trained in UTAP, but more training is needed. Additionally, signage and websites need to be updated to reflect the assessments that have been conducted.

In addition, more could be done to make parks, trails and other open spaces more welcoming to diverse populations. Efforts such as last year’s Get out of Town campaign in New York City may help raise awareness of the beauty and easy accessibility of some of the state’s richest natural resources. Ads showing persons of color and/or celebrities and other opinion leaders engaged in activities in state parks or trails may also legitimize the idea that they are worth a visit. For example, the state could host African American State Park Days to encourage visitation by African Americans and celebrate African American history in New York State. Signage should also be made available in other languages.

- Connect with medical and health communities.

OPRHP and DEC should join with the NYS Department of Health (DOH) and others working to increase physical activity levels for all New Yorkers by promoting New York’s recreational resources as offering close to home opportunities to increase daily physical activity and improve mental and physical health.

Personnel from OPRHP participated in a meeting of the Active Communities Work Group of the state’s Obesity Prevention Coalition, Designing a Strong and Healthy New York (DASH), to inquire about how state parks could be used as venues for community physical activity programs. However, DEC and OPRHP should become permanent members of this coalition and actively participate in implementing the state’s Prevention Agenda. In addition, concessionaires at state parks could be required to abide by the healthy eating guidelines developed by DOH in terms of portion size and options offered.

The state could launch a statewide fitness challenge as has been done in other states such as Georgia, where the program is a partnership between the state parks and health agencies. As part of the challenge, state parks and historic sites offer activities, such as hiking and biking, to help burn calories and build muscles. A challenge website allows participants to track calories burned and track weight loss. Such a program would be attractive to a large corporate sponsor.

In other states, such as Missouri, Wisconsin and Illinois, the governor has issued a walking challenge. Governor Cuomo could do the same and the state's parks and trails could be touted as great place to fulfill that challenge.

- Continue to support partnerships, events and programs that engage volunteers in the stewardship of our natural and cultural resources.  
Education and interpretation programs are critically important to fostering a sense of stewardship, particularly in young people. Engaging youth and other New Yorkers in the direct stewardship of our parks, trails and other open spaces through cleanup, improvement and beautification projects builds a lasting connection to these special places. The State should continue to support partnerships, events and programs that instill a sense of stewardship, particularly in youth, such as the annual I Love My Park Day and Canal Clean Sweep volunteer events.
- Streamline volunteer registration and liability.  
To facilitate volunteer participation in stewardship of state lands, DEC, OPRHP and NYS Canal Corporation should develop a standard, universal registration process for volunteers working on lands under their control. Other steps that will facilitate more widespread volunteerism in New York parks and trails should also be taken, including simplifying complicated permitting processes, allowing long-term volunteers such as park Friends or adopt-a-trail groups to sign year-long or multi-year stewardship agreements, and removing any fees for volunteer registration and permitting.

The issue of volunteer liability and workmen's compensation insurance while working on public lands should be uniformly addressed across the state, as this is often a disincentive for volunteerism for both the volunteers and the agencies and organizations which host them.

## **Addressing Climate Change**

Our state should act with long-term resiliency and sustainability in mind and, as such, we are pleased to see the emphasis on climate change in the draft Plan.

We believe that climate change—which is creating higher ocean levels and more frequent and severe storms—is in large part the result of the addition to the atmosphere of greenhouse gases from human activities. New York alone cannot address climate change, but it must not make things worse and should regard the reduction in emissions of greenhouse gas as its duty.

Employing parks and trails as part of a comprehensive resiliency strategy will help us live up to this duty:

- more trees in parks and planted along trails provide a natural form of carbon sequestration;
- open spaces, trails and greenways, as part of natural buffering and water dispersal zones, moderate temperatures from the urban heat island effect;
- safe multi-use trails and street network infrastructure that encourage walking and bicycling for transportation reduces the combustion of fuels which emit greenhouse gases; and

- properly located, constructed and maintained public parks and trails can provide natural protective systems while keeping the lands they occupy in productive, attractive use.

Therefore, restoring existing park and trail systems and designing new parks, trails and greenways as an integral part of protective systems and facilities should be a major strategy in protecting other infrastructure systems and the rest of the built environment from future significant storms.

## **Ensuring Clean Water, Air, and Land for a Healthy Public and Vibrant Economy**

- The preservation of parks, trails and other open space significantly contributes to a vibrant economy. To further strengthen the case for conservation, we recommend adding information on the economic impact of parks and trails to this section. Specifically:
  - The tourism dollars generated by parks are critical, especially to local Upstate economies. According to a 2009 independent study commissioned by PTNY, the NYS Park System boosts the state's economy to the tune of nearly \$2 billion annually—that's a 5-to-1 return on investment. For every dollar the state invests in the park system it gets back \$5. Plus, the state park system creates 20,000 jobs, exclusive of state parks employees. The study also showed that about \$744 million of visitor expenditure—that is, around 40% of total visitor spending—comes from visitors living outside the communities in which the parks are located. This is money local businesses would not have without the presence of the parks to attract visitors to the area.
  - PTNY's 2014 economic impact study of the Erie Canalway Trail visitor demonstrates an annual trail traffic volume of more than 1.58 million visits per year. These visits generate an economic impact of approximately \$253 million and supports 3,440 jobs in the local economies within the trail corridor.
- New York's system of parks, trails and forests is a priceless legacy that must be protected for current and future generations. We enthusiastically applaud the Governor for his decision to ban fracking.
- We offer the following comments on the transportation action items listed on pages 52-53:
  - We strongly support efforts to connect recreational resources to public transportation. The State should join with Chambers of Commerce, local government leaders, tourism officials, and cycling advocates to encourage Amtrak to develop roll-on service for bicycles on Amtrak trains, especially for persons who do not own or chose not to travel by vehicle.

Amtrak serves Buffalo, Albany, and all the major communities along the Erie and Champlain Canalway Trails and the Hudson Valley. Despite the fact that roll-on bicycles are allowed on trains in other parts of the country, Amtrak prohibits bikes from being rolled onto the Maple Leaf, Empire Service, Adirondack, and Ethan Allen trains. Furthermore, while bikes will soon be able to be transported, unboxed, in the baggage car attached to the Lakeshore Limited, this is only one train that serves the corridor, essentially making this service unavailable to the majority of potential users.

Because of the growing popularity of the Canalway Trail and other New York State bicycling destinations and the higher income level of many touring cyclists, the lack

of roll-on service in the state is a lost opportunity for Amtrak and the restaurants, lodging and other businesses in communities that serve these cyclists.

- We also support using trails to connect established communities; this will encourage denser development, preserve open space, and promote additional physical activity through active transportation and recreation.
- We support the recommendation to implement the 2005-2030 Statewide Transportation Master Plan as it discourages sprawl and encourages energy efficiency and emission-friendly activities and mode choices such as bicycling, walking and public transit. However, we urge the NYS Department of Transportation (DOT) to update the state's bicycle and pedestrian plan, which has not been updated since 1997.
- We urge DEC and OPRHP to work with surrounding communities to underscore the importance of adoption of a Complete Streets policy and implementation of that policy to improve opportunities for persons of all ages and abilities to feel safe in accessing the state's parks and trails by all modes of transportation available.

## **Protecting, Using and Conserving our State's Natural Resources and Cultural Heritage**

### *Stewarding our Open Spaces*

#### Stewardship of State Lands

- **ORPHP Infrastructure:** Through the Governor and Legislature's strong commitment, OPRHP has been able to sustain its progress in addressing the estimated \$1 billion in infrastructure needs and critical safety repairs, breathing new life into the park system. The nearly \$270 million investment made by the state over the last three years, married with over \$151 million in other funds, is creating strong local jobs and helping to grow the state's economy while also restoring and reinvigorating treasured state parks and historic sites. Nearly 300 park improvement and enhancement projects are taking place in every region of the state thanks to the NY Works initiative. Flagship parks, including Niagara Falls and Jones Beach, are being rejuvenated before our eyes in innovative ways that are sure to pay dividends in the coming years.

Challenges in the state park system remain. According to recent state reports, almost every park and historic site in the system has some infrastructure need, from replacing aging water and sewer systems to rehabilitating restrooms to repairing bridges, dams, roads, leaky roofs and swimming pools. The storms of 2011 and 2012 (Irene, Lee and Sandy) only further compounded that need, and highlighted both the vulnerabilities of the system, and the important role that the natural infrastructure features found in our parks play in storm and flood protection.

With an investment of \$90 million annually, the existing backlog in capital needs can be addressed over a roughly ten-year period, putting the state on a sustainable course to meet future maintenance demands.

- **OPRHP Operations Budget:** OPRHP's budget has been cut 23% over the last few years—more than many agencies—and it is operating today with 1,500 fewer staff than it was in 2008. With decades of underinvestment in state parks, the effects can be felt on the ground

with reduced hours, days, and seasons, fewer programs and workers, fewer park police, and less maintenance, not to mention fewer resources dedicated to natural resource protection and the visitor experience. While critically important, capital improvements without sufficient funding for operations—particularly as new facilities are built and others are upgraded—leave OPRHP struggling to achieve its mission of “providing safe and enjoyable recreational and interpretive opportunities for all New York State residents and visitors and to be responsible stewards of our valuable natural, historic and cultural resources.”

With visitation at its highest in a decade and state-of-the-art nature centers and other facilities being designed and built, there is an opportunity for the stewards of our natural resources to provide education, guidance and inspiration to the public as to how we can best protect and enjoy our environment and celebrate our cultural and historical past. Our state parks are essential community resources and with continued investments, they can and should be utilized to provide important education and interpretation of the natural world and global environmental issues such as climate change.

OPRHP’s operations budget should be put on an upward trajectory so that our state parks and historic sites can more fully realize their potential as economic engines for local communities, and OPRHP can make progress towards achieving the goals in the Open Space Plan.

- NYSDEC Operations budget: According to the recently release report by the State Comptroller, NYSDEC staff cuts and constrained funding have impacted agency operations for more than a decade. NYSDEC’s budget and workforce should be increased so that they have the employees and the resources necessary to ensure the safety of our air, land, and water and can adequately serve as the stewards of many of our most precious and irreplaceable natural resources.
- Conduct an inventory and assessment of assets: Before the state can begin to fully implement new strategies for maintaining and enhancing the state park system, there is a need to more completely understand the portfolio of facilities that currently sit underutilized. We recommend OPRHP build upon its October 2010 Capital Needs Assessment and conduct an inventory of assets for mission-related revenue opportunities, such as historic buildings as overnight accommodations.
- Continue efforts to complete land management plans: Work should continue to complete DEC Unit Management Plans and OPRHP park master plans for both existing and new land acquisitions. We recommend that specific goals be set for completion of these plans for areas beyond the Adirondacks and Catskill Park.
- Support park and trail not-for-profit organizations capacity grants program: PTNY supports the recommendation of the Capital District Regional Open Space Advisory Committee to establish a park and trail Friends capacity grants program funded through the EPF and is ready to work with OPRHP to administer such a program. As the Committee acknowledges, active and engaged grassroots organizations already contribute significantly to the stewardship of the state’s parks, trails and historic sites, raising tens of millions of dollars and logging hundreds of thousands of hours of volunteer assistance. A small investment of Environmental Protection Fund (EPF) funds in a capacity-building grant program to strengthen these organizations will reap large benefits:
  - Enable groups to leverage more private, state and federal funding;

- Marshal more volunteer power;
  - Augment the Governor’s historic investment in parks;
  - Ease the fiscal constraints on state agencies and local governments, especially on operations and maintenance; and
  - Enhance the experiences of the millions of visitors to New York’s state parks, trails, and historic sites as well as other open space and recreational resources.
- Establish a year-round volunteer corps: For the past three years PTNY has worked with OPRHP and local Friends groups to engage thousands of volunteers for the popular event, I Love My Park Day. In May 2014, thousands of volunteers contributed more than 12,000 volunteer hours to cleanup, repair, and beautify more than 80 state parks and historic sites. With a 150% participation increase from 2012, I Love My Park Day has gained momentum and is making a real difference for parks and historic sites around the state. Imagine what could be accomplished by a year-round volunteer force. The state, in partnership with PTNY, should explore plugging into existing volunteer networks, such as AmeriCorps, to grow the event into a year-round volunteer program.

## Greenways and Trails

Since the first Open Space Plan was completed in 1992, there has been a dramatic increase in the number of multi-use trails and greenways, as well as the number of people using them, in communities all across the state. We are pleased that this popularity has resulted in a growing number of trails and greenways being included in the regional and statewide priority project lists.

In the section on statewide priority projects, the Plan mentions the Erie Canal Greenway (p. 150) as part of a “long-term effort to create an interconnecting greenway system across New York State.” PTNY applauds the creation of such a statewide trail system and recommends that, with public input, the state actively develop a plan for creation, design, maintenance, and promotion of a comprehensive, interconnected statewide system of multi-use trails, spearheaded by a statewide task force. Many MPOs have completed regional trail plans which could serve as a foundation for this effort. Such a plan would help guide acquisition and funding decisions so that resources can be devoted to those corridors that provide important linkages between communities and public lands across the state.

The Plan states, however, that “The complete Greenway system will ultimately comprise three distinct parts—the Erie Canal Greenway, the Niagara Greenway and the Hudson Valley Greenway.” While PTNY supports the creation of a statewide greenway system, it strongly believes that there are other major corridors, some of which are already listed in the plan as of statewide importance, which must be included in an interconnecting statewide greenway system:

- all parts of the Canalway Trail System, therefore the **Champlain, Oswego, and Cayuga-Seneca Canalway Trails, in addition to the Erie Canalway Trail;**
- the **Long Island Motor Parkway Trail**, extending across Queens, Nassau, and Suffolk counties;
- the 90-mile **Genesee Valley Greenway** (already proposed some years ago as an element of an Empire State Greenway) along with the newly proposed Triple Divide Trail in western New York;
- the **Harlem Valley Rail Trail** in the Hudson Valley;
- the **Catharine Valley and Black Diamond Trails** in the Finger Lakes;
- the **Chenango Canal/O&W Railroad corridor in Central New York**, extending from Utica to Binghamton; and

- the proposed 90-mile **Adirondack Recreational Trail** along the Remsen-Lake Placid Travel Corridor in the North Country.

We support integration of corridors and trails with local communities as this is the way they will get the most use and that communities can best benefit from that use. In some cases, acquisition will be needed, as stated on page 152 of the Plan, as without broader acquisition some communities will not have the opportunity to reap the recreational, active transportation, health, and quality of life benefits that trails can provide.

We commend the state for calling out rail trails, the Canalway Trail System, the Genesee Valley Greenway, and the Remsen-Lake Placid Travel Corridor as being of statewide importance. However, we recommend that the entire Chenango Canal corridor and O&W rail line between Utica and Binghamton be included in the listing for the Genny Green Trail/Link Trail as these corridors provide connections to other major trail systems and will preserve the historic route and resources of the Chenango Canal.

We are pleased that Region One/Long Island created a separate trails and greenways category as part of its priority project list and Region 9 not only created a Trails and Trailways category but also selected the Chautauqua County Greenway Plan as a priority project. Because trails and greenways are a major state recreation and alternative transportation resource, PTNY recommends that all regions be required to create a trails and greenways category as part of the regional priority lists for the next Open Space Plan update. We also recommend that the state encourage counties and local municipalities to prepare trails and greenways plans as part of their comprehensive plans to ensure that critical corridors are available for the future.

## **Regional Priority Project List Recommendations**

The development of trail networks throughout the state is an important component of PTNY's mission statement and has been an integral part of its work for more than 25 years. In 2004, PTNY initiated its *Healthy Trails, Health People* (HTHP), supported in part by a grant from the Healthy Heart Program of the NYS Department of Health. Through HTHP, PTNY has worked on 36 trail projects in communities across the state to promote the development of trails as a way to improve the health of New Yorkers. We are pleased to see that New York State has recognized the importance of some of these trails by including them in the Plan. Many of these projects will have longstanding positive impacts on communities across the state by promoting recreation and preserving valuable open space.

First, PTNY would like to register its support for the following HTHP projects which are included in the Plan as Priority Projects.

- |                               |                                  |
|-------------------------------|----------------------------------|
| • Long Island Motor Parkway   | • Albany County Rail Trail       |
| • D&H Canal Trail             | • (Helderberg Hudson Rail Trail) |
| • Hoosic River Greenway       | • Kingston Trail Connections     |
| • Salmon River Greenway       | • Genesee Valley Greenway        |
| • Erie Cattaraugus Rail Trail | • Erie Canalway Trail            |
| • O&W Rail Trail              | • Champlain Canalway Trail       |
| • Delhi Riverwalk             | • Chemung Valley Riverside Trail |
| • Quassaic Creek Trail        | • Susquehanna Greenway           |

Second, we believe that other HTHP projects have a significant value in promoting recreation and open space preservation across the state have been excluded from the Plan. These projects



serve as important linkages between populations and their local parks and open spaces, providing important tourism, quality of life, and alternative and active transportation benefits.

- Montezuma Trails (Regions 7 & 8): This collection of trails provides important linkages between the hamlet of Montezuma and historical and cultural sites located along the Erie Canal and the Montezuma National Wildlife Refuge, offering residents and visitors the opportunity to enjoy a unique recreational experience while at the same time, preserving a delicate ecosystem.
- Little Ausable River Trail (Region 5): This 3.5-mile trail will connect the Peru town center with the town's three recreational fields, providing residents with safe and healthy access to recreational amenities, schools, and town services.
- Queensway Trail (Region 2): This 3.5-mile urban trail will provide the diverse Queens population with access to shopping and community and recreational resources and promote the preservation of open space in a location with an especially limited supply of undeveloped green space.
- Chenango River Greenway (Region 7): This 20-mile trail network will follow abandoned trail corridors along historically significant canal routes. The trails will provide strategic connections between several village centers and sites of recreational and cultural importance. This trail network will not only provide recreational opportunities for many New Yorkers, it will be a boon to tourism in the region.
- North Buffalo Greenway / Tonawanda Rail Trail (Region 9): This urban/suburban 6-mile trail will link the 360-mile cross-state Erie Canalway Trail in the City of Tonawanda with North Buffalo neighborhoods, significantly improving access to schools, commercial centers, parks, and Buffalo's light rail transportation system.
- D&H Rail Trail (Region 5): This 20-mile trail crosses between Vermont and New York and has the potential to link the village centers of Granville and Salem, New York and Castleton, Vermont. The trail traverses the Slate Valley region, known as the "colored slate capital of the world." Completing this trail will provide an important boost to tourism in a uniquely beautiful region of New York State.

### *Statewide*

#### Close the gaps – Complete the Erie Canalway Trail by the Erie Canal bi-centennial in 2017.

Extending 360 miles across New York, the Erie Canalway Trail brings important economic, public health, tourism, and quality of life benefits to more than 3.7 million New Yorkers living within the 14 counties where the trail is located. With 277 miles now open to the public, the Erie Canalway Trail is 77% complete and on its way to becoming the longest, continuous intrastate multi-use trail in the nation and a world-class destination for cyclists and other outdoor enthusiasts. However, the Canalway Trail can neither realize its full potential as an internationally known tourism destination nor offer maximum economic and quality of life benefits to the more than 200 communities along its length until it is finished from Buffalo to Albany as a continuous off-road trail. Already the Erie Canalway Trail generates an economic impact of \$253 million per year, including \$58 million in new money from outside the region. The State must make completion of the Canalway Trail one of its highest priorities and commit to securing the approximately \$35 million needed to complete the 83 remaining miles of trail in time for the celebration of the 200<sup>th</sup> anniversary of the construction of this world-class resource.

PTNY also emphasizes that the state cannot rely on the Federal Transportation Enhancements Program for its multi-use trail development as mentioned on p. 152 in relation to developing unused or abandoned railroads for trail use. New York must dedicate state funds to trail development.

### *State Park & State Historic Site Protection*

#### Enhance protection of existing state parks and historic sites

PTNY supports OPRHP's efforts to improve access, protect viewsheds, eliminate in-holdings and provide buffers to protect resources, as well as enhance recreational and cultural resources.

### **Environmental Protection Fund**

The EPF has been instrumental in realizing many of the recommendations presented in the Plan by helping communities retain open space and farmland, revitalize waterfronts, create local parks, and preserve historic resources in addition to assisting state agencies improve stewardship of state lands. Many EPF programs provide communities the ability to use natural solutions to help reduce risk and plan growth in a way that improves sustainability and resilience in the face of more frequent extreme weather events.

A 2012 analysis by The Trust for Public Land found that for every \$1 of EPF funds invested in land and water protection, \$7 in economic benefits through natural goods and services is returned to the state of New York. EPF-supported industries generate approximately \$40 billion in revenue every year.

We applaud the Governor's support for the EPF and the productive steps taken to grow the fund over the last two years. By further enhancing and restoring the EPF, we will generate economic activity and revenue, build green infrastructure, protect the environment and clean water, and create jobs in many sectors throughout New York State. We join our partner organizations in recommending that the EPF be put on a path to a sustainable funding level of \$300 million annually in the future, which will allow us to meet current demand and implement critical programs across our state.

In addition to adding a capacity-building grants program for park and trail Friends groups to the EPF as discussed above, the state could also use the EPF to acquire and make more accessible lands near and in urban centers.

PTNY also supports the Region 4 recommendation to increase the amount and the dollar maximum for small projects because it can make a difference in acquiring additional land to extend a trail corridor or address places where additional land may be needed to address a washout or a landowner issue.

### **Conclusion**

Thank you for the opportunity to comment on the 2014 New York State Open Space Conservation Plan. We join with you in working to preserve, protect and promote parks, trails, greenways and other open spaces throughout the state.

Sincerely,



Robin Dropkin  
Executive Director