



## **Scoping Comments for the Allegany State Park Draft Master Plan and Draft Environmental Impact Statement**

**By Citizens Campaign for the Environment**

Citizens Campaign for the Environment (CCE) appreciates the opportunity to provide scoping comments on the draft master plan and draft environmental impact statement for Allegany State Park. CCE is an 80,000 member, non-profit, non-partisan advocacy organization working to protect public health and the natural environment in New York State and Connecticut.

Allegany State Park's 65,000 acres make it the largest state park in New York, containing the largest contiguous stand of mature forest and the largest old growth forest area in New York west of the Adirondacks. CCE has worked for years to protect this amazing natural area for current and future generations. **CCE offers the following comments on the scope for the draft master plan and draft environmental impact statement (DEIS):**

### **Include Allegany State Park as a Park Preserve under Article 20 of NYS Parks, Recreation, and Historical Preservation law.**

Mature forests, old growth trees, diverse wildlife, lakes, streams and more comprise this amazing ecosystem that is visited by more than a million people per year. The park drives tourism in the region, and is a special place that should be protected for current and future generations. Given the inherent value of this remarkable place, and its vulnerability to be exploited for various natural resources- whose extraction would be harmful to the health of the ecosystem- the Master Plan should recommend that the state include Allegany State Park as Park Preserve under Article 20 of NYS Parks, Recreation, and Historical Preservation law. Just as our beloved Zoar Valley gorge was recently established as a state nature and historic preserve, Allegany State Park should be given the same level of protection to ensure that future generations can enjoy the park as we do today.

### **Prohibit commercial logging within the entire park.**

CCE applauds the "Policy on the Management of Trees and Other Vegetation in State Parks and Historic Sites," enacted by Commissioner Carol Ash on March 9, 2009. The policy prohibits commercial logging in state parks, and we look forward to this policy being reflected in the Allegany master plan.

**Privately owned sub-surface mineral rights within the boundaries of the park should not be drilled.**

With a significant amount of subsurface mineral rights in the park still privately owned, the master plan should affirm the state's commitment to public acquisition of these mineral rights. Drilling in this sensitive ecosystem would be devastating to the health of the ecosystem. Trucks, spills, noise, and tree removal associated with drilling would adversely impact wildlife, water quality, and public enjoyment within the park. *Drilling in Allegany for oil or gas, including Marcellus shale, should not be included in the vision of the master plan.*

**Allegany must not be used as a repository for carbon sequestration**

There is currently an increased interest in carbon capture and sequestration (CCS), particularly with the nearby Jamestown coal plant CCS proposal. CCS is an unproven technology, and the ability to successfully sequester carbon underground long-term is highly questionable. The potential adverse impacts of failure of sequestration and release of vast amounts of CO<sub>2</sub> into the environment are unknown, and potentially harmful. Additionally, the increased industrial activity associated with carbon sequestration, including truck traffic, infrastructure, and noise could adversely impact wildlife, water quality, and public enjoyment within the park. The geological formations in Allegany State Park should not be used for carbon sequestration, since the technology and process is not proven and potentially harmful to the ecosystem.

**Protecting habitat**

Wetlands have a tremendous ability to filter pollutants, provide important habitat for fish and wildlife, and absorb floodwaters. To protect water quality, as well as fish and wildlife, the master plan should incorporate a process to map and protect wetlands of all sizes throughout the park.

**Public Access**

CCE supports public access in the park; however, the master plan should focus on improving public access by managing existing hiking trails and parking lots, rather than damaging the forest and creating new trails and lots. In cases where buildings or roads must be reconstructed, low impact development strategies such as permeable surfaces, and greywater reuse should be utilized to manage stormwater and protect water quality in the park.

**Eliminate pesticide use within the park to maximum extent possible.**

CCE applauds Governor Paterson's pesticide free goal for New York State Parks, as it is critical to protecting public health and the environment in our treasured state parks. The adverse impacts of pesticides on public health and the natural environment are well documented, and in most cases, are not necessary. The master plan should incorporate an aggressive plan to eliminate pesticides wherever possible, as soon as possible.

**Why is the OSPHP developing a master plan now?**

Given the state's fiscal crisis and lack of resources, what can be accomplished? What will the process of developing a master plan cost, and where is the money coming from?

What are costs of important improvements that are needed for Allegany State Park, such as drinking water infrastructure, septic system improvements, cabin improvements, Red House administration building upgrades, road and parking lot improvements, and others? Can these improvements be accomplished without a master plan? If so, will a master plan detract funds that could be utilized to fund these important projects?

Thank you for your consideration of our comments.

Sincerely,

Brian Smith  
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Citizens Campaign for the Environment