CRANDON Park Governance & Funding

APPROACHES FOR ENABLING STEWARDSHIP

VOL.5



The Crandon Park: A Call for Change report is comprised of an Executive Summary and the following Research Volumes:

- Vol. 1 Introduction
- Vol. 2 Crandon Park Today | Part 1 Site Analysis
- Crandon Park Today | Part 2 Specific Area Analysis
- Vol. 3 Relevant History
- Vol. 4 Master Plan Evolution
- Vol. 5 Park Governance & Funding
- Vol. 6 Recent Best Practices
- Vol. 7 Park Precedents
- Vol. 8 Historic Documentation

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Crandon Park: A Call for Change Research & Analysis Report

Volume 5

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Prepared for Citizens for Park Improvement (CPI)

Elaborated by West 8 urban design and landscape architecture





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Park Governance & Funding

Approaches for Efficiency and Enabling Stewardship

Public parks across the country suffer from reduced budgets and diminished levels of municipal staffing. Yet at the same time, parks face growing programmatic pressures arising from intensifying ecological challenges and the rising expectations of visitors.

To successfully address this intense confluence of pressures, and to effectively optimize their operations, public parks must avail themselves of a growing array of innovative and effective management models, tools, and strategies.

This volume describes Crandon Park's current management structure, which is tasked with the complex duty of managing and maintaining a unique and diverse site. It then offers three case studies of major parks whose management models more heavily upon public/private partnerships than Crandon Park's approach.

The volume closes by offering three "lessons learned" that can inform Crandon Park's future management model. Such an enhanced management model stands to help the Park optimize its programming, maintenance, funding and operational structure. Our analysis concludes that this enhanced model would help Crandon Park reap new revenues, attract and nurture new constituencies, help the site attain long-term sustainability, and help the Park complete much of the valuable but unfinished work set forth in the current Master Plan.

5.1 Overview of the Crandon Park's Management, Operations and Funding Structure

Governance Structure



Crandon Park Governance Structure

1. "About Miami-Dade Parks," Miami-Dade County, n.d., https://www. miamidade.gov/global/recreation/aboutparks.page)

2. "About Miami-Dade Parks," Miami-Dade County, n.d., https://www. miamidade.gov/global/recreation/aboutparks.page)



Crandon Park Staff Office

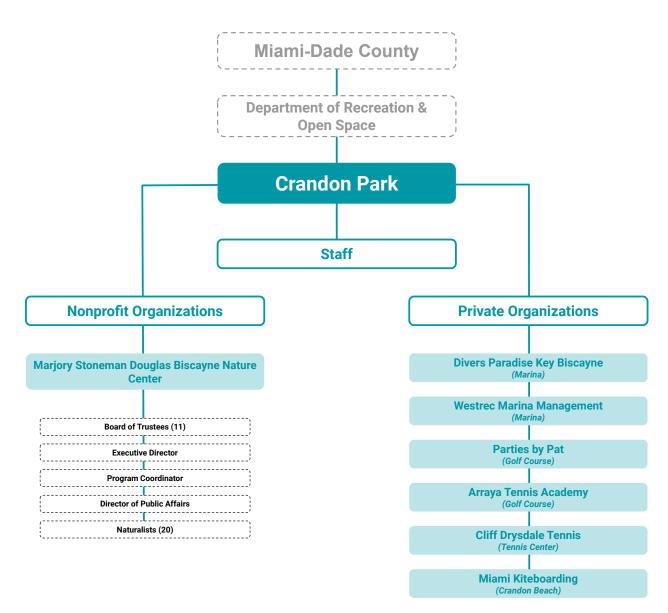
Crandon Park is owned and managed by the Miami-Dade County Parks, Recreation and Open Spaces Department. The Department is America's third-largest park system. Its 278 parks, more than 13,750 acres of land, six golf courses, six marinas, 16 miles of beaches, and attractions like Zoo Miami, attract millions of visitors each year. Crandon Park is one of seven Heritage Parks within this system.¹

The Department and the park system have won multiple awards for design excellence, their stewardship programs, and their recreational offerings.²

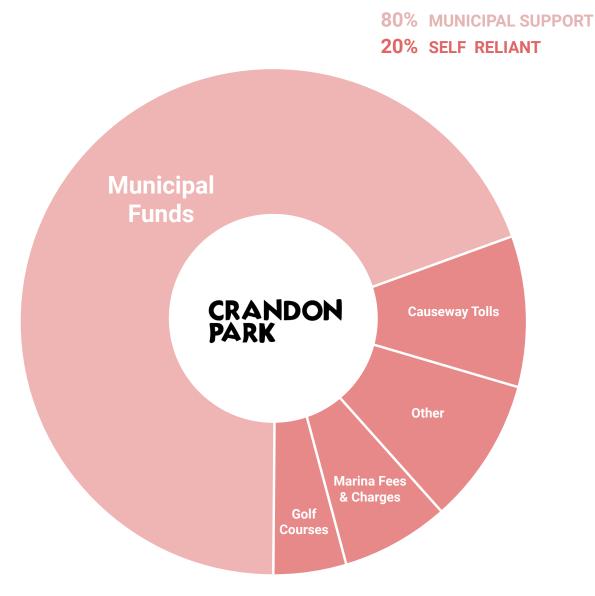
Various facilities within Crandon Park are managed by three department divisions:

- Crandon Golf: Managed by the Division of Golf Enterprise
- Beach maintenance: Managed by the Division of Beach Maintenance
- Day-to-day park operations, marina and Tennis Center: Managed by the Division of Coastal Park and Marina Enterprise (CPME)

The constraints created by the *Crandon Park Master Plan* are presumably causing challenges and barriers for the county staff to fulfill their public mission for Crandon Park. The document does not encourage local decision-making. The document's constraints also limit the Park's revenue generation and ability to accept donations, compounding the County's management challenges.



Crandon Park's Current Governance Structure



- Limited
- Heavily Reliant on Municipal Support
- Zero Opportunity for Community Investment

General Interpretation based Upon Parks, Recreation & Open Space Department 2019-2020 Operations Budget

Funding Model

Per the Miami 2018-19 Proposed Budget report, the Parks Department's revenue by sources included³:

- 50% Proprietary Fee and Bond Funds (Enterprise Funds, User Fees/Charges/Permits, Misc. Revenue)
- 16% Interagency Transfers
- 17% County-wide General Fund (taxes)
- 17% Unincorporated Municipal Service Area (UMSA) General Fund

In 2015, The Parks Department managed 61 Federal, State and local grants valued at \$25,638,000.⁴

The Department's revenue stream is enriched by partnerships with a range of private organizations, donors, and academic entities. As illustrated in the above financials, Miami-Dade County supports the Park's Department heavily – over 50% of funds are provided by municipal functions.

Roughly 80 percent of Crandon Park's revenue stream derives from municipal funding and causeway fees. Of the remaining 20%, half comes from golf and Marina fees. It appears that only a negligible percentage of Park proceeds, if any revenues at all, derive from community donations, though the high degree of budget opacity makes it difficult to calculate a precise percentage. Our team was also unable to pinpoint the level of Crandon Park revenue that originates with the Parks Foundation of Miami-Dade, which is discussed below.

As also discussed below, Crandon Park's 80-percent reliance upon public funding contrasts sharply with the more-varied revenue mix that supports New York City's Central Park, where only 25 percent of park revenue comes from municipal donations. The difference is stark: Central Park is dramatically more self-reliant than Crandon Park. 3. "FY 2018 - 19 Proposed Budget and Multi-Year Capital Plan"(Miami-Dade County, n.d.), https://www.miamidade. gov/budget/library/fy2018-19/proposed/ parks-recreation-and-open-spaces.pdf)

4. Parks Foundation of Miami-Dade, "Power of Parks," (2015)

Stewardship Opportunities

Recognizing that the County's general fund was not adequate to sustain the rapidly growing cost of the Department, community leaders successfully advocated for voter approval of a Building Better Communities Bond Issue in 2004.

The Parks Foundation of Miami-Dade was created that same year in the aftermath of the bond's approval. The Foundation offers "a broad range of opportunities for individuals, civic groups, and corporate sponsors to get involved through fundraising programs and volunteer opportunities." It collaborates "with organizations, donors and partners" to "build landmark parks and facilities, provide programs for children, active older adults, people with disabilities, and a-risk communities." The Foundation also oversees an Adopt-A-Park program "as a mechanism for community activists to generate needed funds for improvements to the historic, ever-expanding park system."⁵

Members and organizations of Key Biscayne also use Crandon Park for programs such as Fill-A-Bag and Michael's Magic Camp. Fill-A-Bag provides stations along the beach designed to empower people to turn daily walks into meaningful beach cleanups. Its whitewashed six-foot post has four cobalt blue pegs — and provides beach-goers with on-demand reusable bags and re-purposed buckets to fill with trash while walking around the Park.⁶ Michael's Magic Camp gives underprivileged inner-city children the experience of interacting with nature: they learn to swim, kayak, and perform scientific experiments.⁷



#FillABag installs Fill A Bag Stations are installed

5. Parks Foundation of Miami-Dade, "Our History," Liveaparklife.org (Parks Foundation of Miami-Dade, n.d.), https://liveaparklife.org/about/ accomplishments-and-history/)

6. *"Fill A Bag,"* Key Biscayne Community Foundation, accessed June 9, 2020, (https://www.kbcf.org/programs/fill-abag/)

7. "Fill A Bag," Key Biscayne Community Foundation, accessed June 9, 2020, (https://www.kbcf.org/programs/fill-abag/)

Maintenance

The study team's field reconnaissance at Crandon Park found numerous examples of strained maintenance. Taken together, these lapses reflect poorly on the Park's operations and maintenance systems. See Volume 2 | Crandon Park Today for a record and description of noteworthy examples of site deterioration.



Crandon Park maintanance by Gap Inc. volunteers on National Public Lands Day 2011

5.2 Alternate Approaches to Park Management

Exploring alternate approaches to public park management, the study team conducted a top-line assessment of the management systems of two prominent New York City parks, and of a State park adjacent to Crandon Park:



Central Park, New York City



Governors Island, New York City



Bill Baggs Cape Florida State Park, Key Biscayne



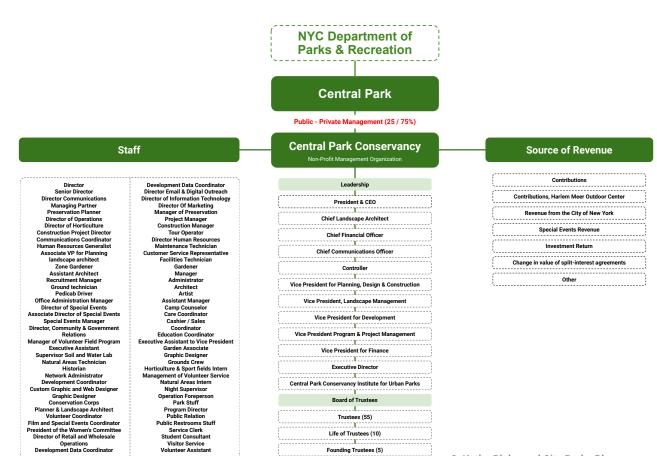
Governors Island, New York City

Case Study 1 | Central Park, New York City



Central Park, New York City, has a management structure that engages the community and generates considerable maintenance funds

Central Park was designed by Frederick Law Olmsted, the founder of Olmsted Brothers. Central Park is Manhattan's principal cultural landscape. providing open space, recreation, events and respite for city dwellers. On a smaller scale, the relationship of Central Park to New York City is somewhat reflective of Crandon Park's link to Miami and nearby Key Biscayne. Central Park, however, benefits greatly from its robust and diverse management, stewardship, and funding mechanisms. Its management structure enables the Park to engage and support the community, while simultaneously generating considerable maintenance funds. The Park itself has a historical linkage to Crandon Park: the initial designer of the latter, William Lyman Phillips, learned his trade as part of the Olmsted landscape architecture business.



Central Park Organization Chart and Source of Revenue

Governance Structure

New York City and the Central Park Conservancy (CPC) pioneered the private-public partnership model as it applies to public parks. Born from the fiscal crisis of the 1970s, when public service funds were scarce, the City turned to the private sector – including . individuals, foundations and corporations – for assistance. The Conservancy now raises 85 percent of Central Park's \$42.5 million annual expense budget and is responsible for the care of the park.⁸

According to the contract between the Conservancy and New York City, "The Conservancy involves the public in the planning of any improvements to the Park and the management agreement makes clear that the City Parks Commissioner is the final authority in the park." Further, "CPC shall provide or cause to be provided, services specified for maintaining and repairing Central Park to the reasonable satisfaction of the Commissioner."⁹ 8. Kathy Blaha and City Parks Blog, "Public Private Partnerships: New York and the Central Park Conservancy," Smart Cities Dive, accessed May 27, 2020, https://www.smartcitiesdive.com/ ex/sustainablecitiescollective/publicprivate-partnerships -new-york-andcentral-park-conservancy/111581/)

9. "Central Park Conservancy," CentralPark.com (Central Park Conservancy, n.d.), https://www. centralpark.com/visitor-info/centralpark-conservancy/)



New York City and Central Park Conservancy (CPC) formed a publicprivate partnership.



Volunteer Greeters from the community helping manage Park's Visitor Center and Kiosks



Stewardship Opportunities

Both the City and the Conservancy provide stewardship opportunities involving maintenance and landscape activities. The Conservancy also hosts company retreats, and benefit events throughout the year, such as luncheons and anniversary celebrations. The city's Department of Parks and Recreation hosts informative tours that educate attendees about the culture, history, ecology and vegetation of Central Park.

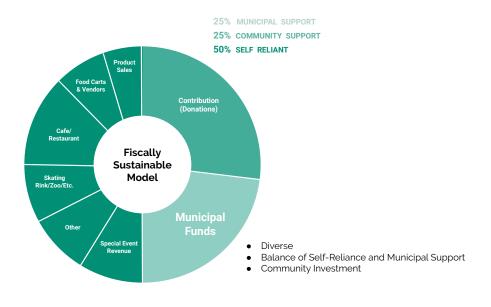
Saturday Green Team volunteers with landscape maintenance



Teen Volunteer Days engages students between the ages of 13 and 18 to promote good stewardship and help out with season park projects, like raking, weeding, or mulching.



Tour guides also lead public walking tours, helping visitors understand the park's history, ecology and design.



Based roughly upon Central Park's Funding Model

Funding Model

Central Park's revenue sources can be parsed out as follows: 25 percent from municipal funds; 25 percent from community support; and half from such self-reliant sources as events, sales, amenities and vendors.¹⁰ The Park shares partnerships with various organizations, and hosts a plethora of revenue-generating activities.

10. Appleseed. "The Central Park Effect: Assessing the Value of Central Park's Contribution to New York City's Economy," November 2015.(http:// assets.centralparknyc.org/pdfs/about/ The_Central_Park_Effect.pdf)

Fees and sales

The Central Park Zoo, skating rink, bike rentals services, multiple restaurants, vendors, sport field rentals, and events help the park remain self-reliant in terms of funding. Food and beverage vendors also generate revenue.

Memberships

The CPC offers memberships to the public, which provide benefits such as in-park vendor discounts and access to exclusive events.

Donations

The CPC's non-profit framework allows for donations and memberships.

Events

Fundraising events, concerts, and winter markets are among the varied events that Central Park hosts in conjunction with partners and the community.



Central Park offers different membership levels who help promote unique causes or special projects through their donations.

Case Study 2 | Governors Island, New York City

Governors Island was designed by the Dutchbased firm West 8 as its first U.S. project. A 172acre island situated eight minutes from Lower Manhattan by ferry, Governors Island is similar to Crandon Park in its position as a nearby retreat within reach of an energetic downtown. Located in New York Harbor, Governors Island is owned by the City of New York. Three entities act as stewards and advocates: the Trust for Governors Island, the National Park Service, and the Friends of Governors Island. These entities work together to create opportunities for the public to engage with and contribute to the Park. In return, the Park is maintained and operated with fees and donations that come from the public.¹¹

11. "About," Governors Island, accessed May 27, 2020, https://govisland.com/ about)



The City of New York created the Trust for Governors Island, which oversaw the operations, planning and redevelopment of 150 acres of the island.



Governor's Island shares stewardship opportunities with the independent non-profit Friends of Governors Island as well as offers a variety of volunteer programs.

Governance Structure

In 2003, the federal government sold 150 acres of Governors Island back to the people of New York, with the island's governance and funding jointly shared by the City and State of New York. The Island's remaining 22 acres, designated as the Governors Island National Monument, are overseen by the National Park Service.

The City of New York created the Trust for Governors Island, the organization charged with the operations, planning, and redevelopment of 150 acres of the island. The mayor appoints the Trust's 13-member board, four of whom are nominated by local officials. The organization seeks to revitalize Governors Island as a destination with vibrant public open spaces and educational, nonprofit, and commercial facilities. With the mandate to activate Governors Island, maximize public use, and attract long-term tenants, the Trust has focused most of its attention on enterprises relating to the arts, culture, and design.

On Governors Island, the National Park Service preserves and protects Castle Williams and Fort Jay; educates the public about the coastal defense story and the harbor's history and ecology; and works in partnership with organizations to promote stewardship, youth engagement, and memorable experiences.

THE TRUST FOR GOVERNORS ISLAND

THE FRIENDS OF GOVERNORS ISLAND

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 Specific Control Result

 Specific Contrel Result

Governors Island offers various gift options and levels of memberships, ranging from \$50 to \$5,000.

GIVE A BENCH

12. Trust for Governors Island Board of Directors, "Budget Report for The Trust for Governors Island: Fiscal Year Ending: 6/30/2019," n.d., https://govisland.com/ about/para-documents)

Funding Model

Funding for Governors Island is closely related to its stewardship opportunities. Indeed, these two initiatives are run under one roof: The Friends of Governors Island.

The Friends of Governors Island is an independent nonprofit that works to ensure the Island's continued growth and accessibility as a vibrant public resource. It serves as the designated fundraising partner of the Trust for Governors Island and the National Park Service. Their core activities include running Governors Island's visitor services and volunteer programs; raising funds to care for Park landscapes, expand public access, and create new opportunities for free programming; and advocating to ensure that Governors Island remains a shared space for all.

Individuals and corporations can purchase Park memberships, which allow access to free ferry rides, food vendor discounts, early access to the Park grounds, private tours, and special events. Funds raised via membership fees support the Park maintenance staff.

The public can "adopt" various landscape features within the Park, from a flower to a hammock. These funds help cover maintenance and landscaping expenses. The public can also make cash donations directly to the Park Fund through the Friends of Governors Island, a nonprofit. The organization also hosts fundraising events and an annual gala.

The various revenue sources sketched above, together with vendor rental fees and other service charges, allow Governors Island to generate 60% of its total revenue from non-governmental sources. The remaining 40% is sourced from federal and municipal subsidies and grants.¹²

Stewardship Opportunities

Governors Island offers a variety of volunteer programs, from being an "ambassador" for the Park and spreading enthusiasm, to collecting Park usership data, and gardening. There are also corporate volunteer events, and opportunities for organizations to host events on Park property. These organizations and their volunteers create a strong and stable constituency for the Park, its preservation and protection.

Critical to the success of Governors Island's stewardship programs is a transparent, informative and easy-to-navigate website.



Governors Island corporate volunteers

VOLUNTEER ON GOVERNORS ISLAND

Governors Island relies on dedicated volunteers to keep this incredible public space welcoming and beautiful for all. Our volunteer program has something for everyone, whether you're hoping to try your hand at gardening, meet new people, or become a true Island insider.

What we're looking for in our volunteers:

- · Passion about public spaces and the value they bring to urban environments
- Excitement about getting to know new people
- Joy in being outdoors
- Commitment to environmental and community stewardship

Apply Now!

In response to COVID-19, the Island will be implementing new health and safety protocols to ensure that all visitors and volunteers can practice social distancing on ferries and while on the Island. Check out the volunteer opportunities below and join our community.

VOLUNTEER OPPORTUNITIES

Island Ambassador

Want to share your enthusiasm about Governors Island with other visitors and help build a community of supporters? Island Ambassadors:

- Serve as a friendly, helpful and informative resource for visitors around the Island
- Answer visitors' questions about the Island's events and attractions
- Provide directions to visitors to navigate around the Island
- Help staff the Island's welcome center and info desk

Governors Gardener

Got a green thumb? As a Gardening Volunteer, you will assist the Trust for Governors Island Horticulture Staff in caring for the Island's sprawling meadows, young forest groves, ornamental flowerbeds and landscaped hillsides. Governors Gardeners:

- Perform seasonal gardening tasks including planting, pruning, weeding, watering, raking, mulching and transplanting (all require ability to bend, lift, and kneel)
- Learn to identify and remove invasive plants
- · Serve as a friendly, helpful and informative resource for visitors

Governors Island offers different volunteer opportunities for park stewardship.



Governors Island volunteers



Governors Island volunteers



Case Study 3 | Bill Baggs Florida State Park, Key Biscayne

Historic Bill Baggs Lighthouse is a main park attraction.



Bill Baggs beach

Located at the southern tip of Key Biscayne, down the street from Crandon Park, is Bill Baggs Cape Florida State Park. Noticeably busier than Crandon Park on weekdays, Bill Baggs offers scheduled tours, walking and bicycle trails through nature preserves, bike rentals, fishing piers, a beach with rent-able chairs and umbrellas, a lighthouse, and two restaurants.

Governance and Operations

The Division of Recreation and Parks (DRP) is the Florida State entity charged with developing and operating Florida's recreation and parks system, which includes Bill Baggs Park. Various agencies have major or direct roles in management of specific Park elements, especially ecological ones. The Florida Fish and Wildlife Conservation Commission (FFWCC), for example, assists staff in the enforcement of state laws pertaining to wildlife, freshwater fish, and other aquatic life existing within the Park. In addition, FFWCC aids DRP with wildlife management programs, including imperiled species management and Watchable Wildlife programs. The Florida Department of State's Division of Historical Resources assists with the protection of archaeological and historical sites.



Bill Baggs Website with Park information

About every ten years, the Division of Recreation and Parks develops a *Management Plan* for the Park. This plan serves as the foundational statement of policy and direction for Park management. It identifies the goals, objectives, actions and criteria or standards that guide each aspect of Park administration. It then sets forth specific measures to be implemented to meet management objectives and provide balanced public utilization.¹³

The plan is reviewed by numerous municipal groups that specialize in such disciplines as bird habitat and archaeological conservation. It is approved by the Division of State Lands' Office of Environmental Services, which acts as an agent for the Board of the Internal Improvement Trust Fund. The draft of this plan is made publicly available and presented via workshops and Advisory Group Meetings prior to finalization and publication.



Bill Baggs Unit Management Plan, last published October 11, 2012

13. Florida Department of Environmental Protection, *"Fiscal Year 2016-2017 Florida State Park System - Economic Impact Assessment"* (The Division of Recreation and Parks, n.d.), https:// floridadep.gov/sites/default/files/ Economic Impact Assessment 2016-2017.pdf)

Funding Model

The Friends of Cape Florida State Park, Inc., is a depository for contributions from the public. These contributions can take the form of donations or memberships. Funds are expended under the authority of a Board of Directors, which consists of "local citizens who love the Park."14 A statewide non-profit called Florida State Parks Foundation also supports Friends of Cape Florida State Park. It accepts charitable gifts and spearheads various Park programs.

Fees and sales

Visitor fees and charges are the principal source of Park revenue. There are admission fees to enter the Park, fees to rent picnic pavilions, boat camp, rent bikes, and rent beach chairs and umbrellas. Patrons can also pay to rent a part of the Park for weddings and other events. Revenues are also generated by two restaurants, and by beach concessions.



OF CAPE

Friends of Cape Florida is a depository for contributions from the public

Memberships

Individuals and corporations can purchase memberships for the Park, which allows access to benefits from free ferry rides, food vendor discounts, early access to the park grounds, private tours, and special events. Funds raised via membership fees support the park maintenance staff.

Donations

Cash donations can be accepted by individuals, organizations and businesses for park operations and programs via Friends of Cape Florida State Park.

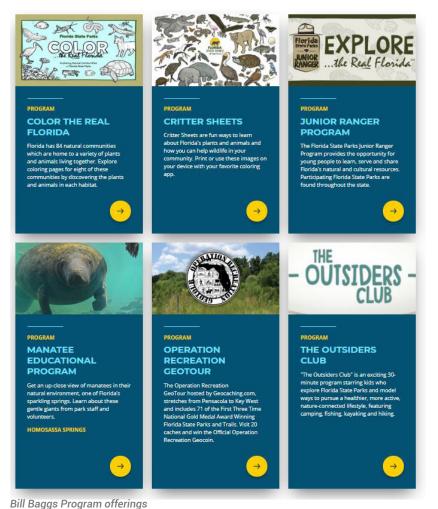
Events •

Friends of Cape Florida State Park also organizes various events and fundraisers, such as a Sea Turtle Nest Adoption program.

In FY 2016-2017, Bill Baggs's total direct economic impact was \$86,129,398. This represents new dollars spent in a local economy by non-local park visitors and park operations. Key variables that affect this level of impact are increased state sales taxes and the total of jobs supported by the Park¹⁵

Stewardship Opportunities

Individuals can engage with the Park by volunteering to give tours of its historic lighthouse, removing invasive species from the property, and various maintenance tasks. In addition to volunteer opportunities, the Park also has various programs and events that inform and its connection with the local community.



14. "About," Friends of Cape Florida, accessed May 27, 2020, https:// friendsofcapeflorida.org/what-we-do)

15. "Fiscal Year 2016-2017: Florida State Park System - Economic Impact Assessment", accessed May 27, 2020, (https://wordpressstorageaccount. blob.core.windows.net/wp-media/wpcontent/uploads/sites/897/2018/12/ Economic-Impact-Assessment-Data-Summary-2016-2017.pdf)



Relics of the Crandon Zoo

5.3 Lessons Learned: Case Study Findings

When it comes to park management, there is at least one big and immediate difference between the management of Crandon Park and the three surveyed parks: Crandon Park depends almost entirely on municipal funds. It has no infrastructure for building and growing a dedicated Park constituency through stewardship opportunities and other means. This limits its structural potential for self-reliance. By contrast, Central Park, Governors Island and Bill Baggs all benefit financially and operationally by tapping resources engendered by their organized, well-developed and dedicated constituencies.

In contemplating ways to enhance Crandon Park's management structure and its capacity for generating revenue, a review of the three case studies yields at least three major lessons:

16. "Why Build Partnerships for Parks?," Project for Public Spaces, accessed May 27, 2020, https://www.pps.org/article/ pppp-chapter1)

Lesson 1: Build pathways for constituency engagement and leverage programming that stimulates community support

"Outreach, advocacy, marketing, promotion, programming, organizing volunteers - these are the ways to tap into the constituency of a public place," advises the Project for Public Spaces. "These kinds of activities, including outreach for capital campaigns and other fundraising efforts, convince people that somebody is doing something, and that the park has an advocate."¹⁶ \

Parks succeed when they provide the surrounding community with clear-cut mechanisms through which local supporters can offer financial donations, volunteer labor, or other resources and assets. Such mechanisms can be built into a park's management structure. Exhibit A shows various ways that a public park can institutionalize mechanisms for constituency engagement. These mechanisms enable the creation and maturation of programs and activities that bring value to the community. These new programs engage the community and trigger fresh infusions of community support. A self-refreshing stewardship pipeline has been created, steadily stimulated by good, community-focused programming.

Lesson 2: Boost self-reliance by pursuing diverse revenue streams

To help protect themselves against revenue shortfalls - which become particularly acute during economic downturns - public parks should diversify their revenue streams by identifying and investing in self-reliant revenue sources. Funds can derive from park amenities, fees, programs, events and other programming. Valuable revenue sources can include donations, fees, grants and sales. As stated above, the best way to maximize the potential of these non-municipal revenue streams is by offering park programming that stimulates community interest and participation.

Lesson 3: Build and nurture a relationship of accountability with the community

Public parks succeed when their management structures engender a healthy relationship of accountability with the public and with their municipal funding sources. The public expects a park to provide for its needs - and the municipality expects the park's management entity to plan, program and maintain a resource that meets these needs. In return, both the city and the management entity can expect the public to support the park through its patronage, revenue-building amenities, and donations. Donors expect the park to be well-maintained, accessible, safe and beautiful. This overall circle of accountability generates value - and creates a self-sufficient and sustainable model for revenue and proper management.

5.4 Improving Crandon Park's Funding Structures

Amendments to the *Crandon Park Master Plan* would be the ideal vehicle for creating a new management structure for Crandon Park. Here are four compelling reasons why this new structure is urgently needed:

- 1. Many Park improvements envisioned in the current *Master Plan* were never implemented, even after the passage of a quarter-century. A new management structure can be created that would be expressly equipped and empowered to press forward on the many desirable but unfulfilled elements of past and current plans for the Park.
- 2. A new and properly constituted management team would be charged with repairing or replacing the large number of physically deteriorated park assets and amenities.
- 3. Among other revenue-generating duties, a new management structure can be charged to attract a first-ever conduit of revenue streams devoted to environmental and cultural preservation, as well as sea-level mitigation.
- 4. Finally, a new management infrastructure could create, encourage and institutionalize a new "stewardship constituency" for Crandon Park -- a dedicated coalition ready to unleash unprecedented levels of synergy and symbiosis between park and community.



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See Crandon Park: A Call for Change - Executive Summary for full list of Acknowledgments.



