March 4, 2019

Honorable Supervisor Hilda L. Solis
Los Angeles County
Hall of Administration - 500 West Temple Street
Los Angeles, CA 90012

RE: Board Letter dated March 5, 2019 - Measure A policies and Grants Administration Manual

Dear Supervisor Solis,

The civic and community leaders signed below recognize the Board of Supervisors’ progressive vision of park equity as evidenced by leading-edge programs that endeavor to turn the County’s high park need areas green. We appreciate the responsiveness to previous communications about the proposed Measure A implementation. After a thorough review of the Board Letter dated March 5, 2019 and the Grants Administration Manual we remain concerned about the County’s readiness to implement the Measure A grant funding process.

This letter supplements a series of correspondences sent to the Board of Supervisors over the past year that has been signed by several dozen park equity supporters across Los Angeles County. The concerns raised in this letter are meant to maintain the integrity of the equity recommendations within Measure A implementation that have been raised by this group and allies previously (and further detailed in Appendix A of this letter), namely the maintenance of the 30% targeted funds for High and Very High Need study areas, the Technical Assistance Program’s emphasis on providing resources to High and Very High Need study areas, and full and resourced implementation of the Displacement Avoidance Policy.

It is important to note, as articulated in multiple sign-on letters submitted by equity advocates, that many of those who took part in the Steering Committee believe the process was flawed on multiple levels and there remains much to be desired - from a park equity perspective - in the provisions of the draft Grants Administration Manual. Nonetheless, having fully participated throughout the Measure A process – from the Park Needs Assessment to the Steering Committee process and more recent efforts to finalize grantmaking policies and procedures — we remain committed to participating in the Measure A implementation process and recommend specific changes to key provisions of the Grants Administration Manual and the Board Letter dated March 5, 2019 summarized below and detailed in Appendix B of this letter.
Summary of Recommendations

- **Targeted Funds:** We are pleased to see the Board Letter establish a floor of 30% of Category 3 and 4 general competitive grant funds designated for projects in High and Very High Need study areas. We urge the Board to adopt commitments and establish the 30% as a minimum within the text of the Grants Administration Manual and establish that the 30% floor can be increased in future years based on the volume of qualified applications for projects that are located in High or Very High Need study areas per given competitive grant funding cycle. The targeted fund levels and other equity mechanisms within Measure A’s implementation should be paired with comprehensive and ongoing evaluation to ensure the County is rigorously addressing park need.

- **Strengthen the Level of Need Criteria within the Competitive Grantmaking Policy:** We are deeply concerned by the language used throughout the competitive grantmaking policy that project types need only to ‘serve or benefit’ residents of High and Very High Need study areas in order to receive points under “Level of Need” competitive scoring criteria. We believe this language undermines well-established evidence on the important health, social, and environmental benefits communities gain by having regular access to park and green space that is in close proximity to one’s home. We urge the Board to establish commitments that qualified projects that are ‘located in’ High and Very High Need study areas would receive maximum points within the competitive grant scoring “Level of Need” criteria. Qualified projects that only ‘benefit, serve or provide access to’ High and Very High Need areas should not receive maximum points under the “Level of Need” criteria. This is the only way the County can fulfill its promise to voters in transforming High and Very High Need areas.

- **Continue the Department of Parks and Recreation’s Stewardship of the Countywide Park Needs Assessment (PNA):** We urge the Board to ensure that the Department of Parks and Recreation (DPR) continues to serve as the lead agency in the oversight, management and updating of the 2016 Countywide Park Needs Assessment (PNA) with the support and cooperation with the RPOSD. Allowing DPR to continue managing and administering the PNA establishes good governance practices within Measure A implementation and helps to avoid any potential conflicts of interest that may arise by separating the County’s park planning and the grant making functions for Measure A.

- **Maintain One Unified Park Needs Assessment for Measure A Implementation:** The creation of a separate Regional Recreation, Beaches, Rural Areas, and Open Space Assessment adds confusion to the original mandate that the voters passed in November 2016, reduces transparency, and creates process inconsistencies that will negatively impact the County’s ability to aggressively target and eliminate entrenched park investment disparities. There should be only one Countywide Parks Needs Assessment to ensure an inclusive, regional approach to documenting park need for all types of park facilities. This Park Needs Assessment should be facilitated by the Department of Parks and Recreation, which led the 2016 Countywide Parks Needs Assessment.

Thank you for the opportunity to provide input on the draft Grants Administration Manual for Measure A. We applaud the Board’s commitment to equity, inclusion and intentionality that was so clear at each step in the lead up to the measure’s passage. The proposed changes in language included in this letter are provided with deep respect and to ensure that implementation processes lead to more equitable outcomes that will benefit all LA County residents and improve both environmental and health outcomes for the region as a whole. We are available to clarify our position in any way that would be helpful and to assist the Board in its due diligence. As ever, we appreciate the Board’s leadership on behalf of all the residents of LA County.
Signatories - Organizational affiliation given for identification purposes only

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The Nature Conservancy

Robin Mark
The Trust for Public Land

Yvette Lopez-Ledesma
The Wilderness Society
Appendix A. Detailed Measure A Equity Recommendations

1. **Commit at least 30% of all competitive grant funding to projects located in the 72 High and Very High Need study areas.** As it stands, Measure A allocates only 16% of total expenditures to High and Very High Need study areas, which account for 52% of the County’s study areas and an overwhelming majority of the County’s low-income communities of color. On average, LA County communities with less park space per capita have shorter life expectancies, lower rates of physical activity, higher rates of premature mortality from cardiovascular disease and diabetes, and higher prevalence of childhood obesity, compared to communities with more park space per capita. Park-poor communities also experience greater economic hardship, making it extremely difficult for these areas to develop park projects without funding from the County. By committing at least 30% of competitive grant funding to projects in High and Very High Need areas, the Board of Supervisors would be investing in communities that have been historically underfunded and taking a concrete step to reduce park access inequities and the related negative health outcomes.

2. **Maintain the Technical Assistance Program’s focus on High and Very High Need study areas.** Disparities in capacity and resources prevent grant applicants in High and Very High Need areas from being able to compete for funding on the same level as applicants in well-resourced, Low Need areas. This can cause competitive grant funding to be distributed inequitably, with Low Need areas receiving more funding than the communities with the greatest need. The Technical Assistance Program can help correct this imbalance by assisting small and under-resourced cities build capacity to develop successful competitive grant proposals, which will allow them to better access Measure A funding for capital projects.

3. **Adopt the proposed Displacement Avoidance Policy and provide additional resources to ensure its effective implementation.** Like many necessary public infrastructure projects, new park development can lead to increased property values. Increased property values can benefit local governments and homeowners, but they can also harm renters, who may experience increased rents. Given the current affordable housing shortage in Los Angeles, we think it is important to include displacement protections in the Measure A Implementation Guidelines. We encourage the Board to consider guidelines that 1) award additional points to applicants who include displacement avoidance strategies as part of their application, as well as applicants working in cities that have tenant protections, such as just cause eviction and value capture policies; 2) expand the pool of Technical Assistance Providers to include affordable housing and tenants’ rights experts to help with the evaluation of applications, specifically around the evaluation of the displacement avoidance strategies, and provide training and Technical Assistance for staff and applicants to refine their displacement avoidance strategies; and 3) establish a Displacement Avoidance Task Force to provide technical assistance to RPOSD in their efforts to implement the Displacement Avoidance Strategy, such as helping to identify best practices, reduce barriers, and increase opportunities for collaboration between the parks and housing sectors. These recommendations can help ensure new park development occurs without displacing members of the communities the parks are designed to serve.
Appendix B. Detailed Board Letter and Grant Administration Manual Language Recommendations and Rationale

1.3. LOS ANGELES COUNTYWIDE PARKS AND RECREATION NEEDS ASSESSMENT UPDATE POLICY

"Measure A provides for the updating of the 2016 Countywide Parks Needs Assessment (PNA). These updates shall include both the Neighborhood Parks and Recreation Needs Assessment (NPNA) and the Regional Recreation, Beaches, Rural Areas and Open Space Assessment.

These updates occur, under the direction and leadership of the Department of Parks and Recreation and with the support and cooperation of the RPOS, as follows:

**Countywide Neighborhood Park Inventory Data.** All park agencies shall update their neighborhood park inventory data annually as a requirement of eligibility to receive Measure A funds. This update shall include park names, park locations, park sizes, and quantity and condition of standard amenities within each park, as described in the PNA. Verifying existing data and providing any necessary updates is required to remain in Good Standing with RPOS.

**Neighborhood Park Need by Study Area Map**
1. Updated neighborhood park inventory data and US Census population numbers as adjusted by Los Angeles County shall be used to update the Neighborhood Park Need by Study Area Map periodically.

**Parks and Recreation Needs Assessment (PNA) Update**
1. The PNA shall be updated once every 8 to 10 years.
2. Every update of the PNA shall contain at a minimum the metrics used in the 2016 PNA (to ensure the ability to track changes over time).
3. Designation of Study Area neighborhood park need levels shall be updated concurrently with the update of the Neighborhood PNA.

**Regional Recreation, Beaches, Rural Areas and Open Space Assessment**
1. A Regional Recreation, Beaches, Rural Areas and Open Space Assessment shall be conducted to inventory existing public recreational, beaches, and open space lands and amenities from the regional perspective and determine the needs of the many diverse geographical areas of the County.
2. The results of the assessment shall be used to help inform project planning and project selection for competitive grants."
3. The Regional Recreation, Beaches, Rural Areas and Open Space Assessment shall be updated once every 8 to 10 years."

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There should be only one Countywide Parks Needs Assessment to ensure an inclusive, regional approach to documenting park need for all types of park facilities. This Park Needs Assessment should be facilitated by the Department of Parks and Recreation, which led the 2016 Countywide Parks Needs Assessment.

In accordance with the proposed changes made above, all further references in the document to the “Neighborhood Park Needs Assessment” and the “Neighborhood Park Need by Study Area Maps,” would need
to be corrected to align with the proposed changes above. These references are found on pages: Table of Contents, xi, xii, 1-4, 2-31, 2-39, 2-47, 3-8. There do not appear to be further references to the “Regional Recreation, Beaches, Rural Areas and Open Space Assessment.”

1.8. GRANTMAKING POLICY

... "Targeting Funds. A portion of competitive grant funds will be designated for projects in High or Very High Need Study Areas.

1. This would affect the following programs: Natural Lands, Local Beaches, Water Conservation and Protection Competitive Grants; Regional Recreation, Multi-use Trails and Accessibility Competitive Grants; Acquisition-Only Grants

2. The portion of funds to be targeted is initially set at a minimum or floor of 30 percent. This percentage will be evaluated periodically and may increase in future years based on the evaluation of metrics tracked by RPOSD, such as the volume of qualified applications for projects that are located in High or Very High Need study areas per given competitive grant funding cycle. The targeted fund levels and other equity mechanisms within Measure A’s implementation should be paired with comprehensive and ongoing evaluation to ensure the County is rigorously addressing park need."

The rationale for equity-focused, targeted funds has been discussed in depth in previous sign-on letters. These recommended changes affirm the County’s clear and unwavering commitment to ameliorating park deficits in High and Very High Need Study Areas. Please note the inconsistencies in language between section 1.8 and 2.2.1 and 2.2.2, shown below, regarding the targeted amount. The changes made to section 1.8 above should rectify the problem. Also note that the Needs Assessment language throughout the document would also need updating to reflect the proposed changes discussed above.