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March 11, 2009

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**Re: Healthy Parks, Schools, and Communities for All -- Public Comments on Statewide Park Development and Community Revitalization Program of 2008**

Dear Ms. Coleman and Mr. Jackson:

The undersigned members of a diverse and growing alliance submit these public comments regarding the Statewide Park Development and Community Revitalization Program of 2008. The attached Policy Brief is fully incorporated by reference here.

Park funds should be allocated based on need not greed. Under a standard that targets communities with the greatest need first, park projects should receive top priority based on park poverty and economic poverty combined. Park poverty is less than three acres of parks per thousand residents, under the draft guidelines. Economic poverty is under \$47,959 median household income. Prioritizing park poverty and economic poverty combined will help achieve equal justice in access to public resources for the most underserved communities, based on race, ethnicity, and income under civil rights and environmental justice laws. People of color and low income people throughout California disproportionately suffer from unfair disparities in access to park, school, and health resources, and suffer disproportionately from child obesity and other diseases related to the lack of places for physical activity and healthy eating. Investments in parks and schools in the most underserved communities are an important part of any green economic stimulus, public works and infrastructure program. Map 2001 shows the communities that are park poor and economically poor, and are disproportionately populated by people of color, in the hatched red hot spots. Using park poverty alone without economic poverty will not accomplish these important public policy goals of improving the quality of life, health, and environment for the most underserved communities.

The guidelines should provide as follows: (1) Projects in communities that are both park poor and economically poor should receive top priority over other projects. (2) Human health including obesity

and diabetes levels should be a significant factor in determining “Community Challenges and Project Benefits,” “Challenges,” and “Youth at High Risk,” and projects addressing health should receive significant priority. (3) Projects should receive significant priority for joint use of park and school facilities. (4) The guidelines should explicitly call for compliance with state and federal civil rights laws guaranteeing equal access to public resources, not just the California Environmental Quality Act (CEQA). See Title VI of the Civil Rights Act of 1964 and its regulations, the President’s Order on Environmental Justice, California Government Code 11135 and its regulations, and the California statutory definition of environmental justice, Government Code 65040.12. (5) The guidelines should implement principles of equitable development: invest in people, invest in stronger communities, invest in the open, invest in justice.

The Policy Report is forthcoming.

We look forward to working with you to adopt guidelines to achieve these important public policy goals of improving the quality of life, health, and environment for all.

Sincerely,

Prof. Judy Baca  
SPARC (Social and Public Art Resource Center)

Angela Glover Blackwell  
PolicyLink

Larry Cohen  
Prevention Institute

Robert García  
The City Project

Harold Goldstein  
California Center for Public Health Advocacy

Martin Martinez  
California Pan Ethnic Health Network

Irma Munoz  
Mujeres de la Tierra

Mark Williams  
Concerned Citizens of South Central LA



## Healthy Parks, Schools, and Communities for All: Park Development and Community Revitalization Guidelines

A diverse and growing alliance supports the distribution of park funds to achieve healthy, livable communities for all the people of California. We look forward to working with the California Department of Parks and Recreation to ensure that park funds reach the most park poor and economically poor communities through the proposed guidelines, the implementation of AB 31, and compliance with equal justice laws. This will fulfill the intent of the legislation and meet the needs of the voters who have passed park resource bonds for the past ten years.

**Park funds should be allocated based on need not greed. Under a standard that targets communities with the greatest need first, park projects should receive top priority based on park poverty *and* economic poverty *combined*. Park poverty is less than three acres of parks per thousand residents, under the draft guidelines. Economic poverty is under \$47,959 median household income. Prioritizing park poverty and economic poverty *combined* will help achieve equal justice in access to public resources for the most underserved communities, based on race, ethnicity, and income under civil rights and environmental justice laws. People of color and low income people throughout California disproportionately suffer from unfair disparities in access to park, school, and health resources, and suffer disproportionately from child obesity and other diseases related to the lack of places for physical activity and healthy eating. Investments in parks and schools in the most underserved communities are an important part of any green economic stimulus, public works and infrastructure program. Map 2001 shows the communities that are park poor and economically poor, and are disproportionately populated by people of color, in the hatched red hot spots. Using park poverty *alone* without economic poverty will not accomplish these important public policy goals of improving the quality of life, health, and environment for the most underserved communities.<sup>1</sup>**

The guidelines should provide as follows: (1) Projects in communities that are both park poor and economically poor should receive top priority over other projects. (2) Human health including obesity and diabetes levels should be a significant factor in determining “Community Challenges and Project Benefits,” “Challenges,” and “Youth at High Risk,” and projects addressing health should receive significant priority. (3) Projects should receive significant priority for joint use of park and school facilities. (4) The guidelines should explicitly call for compliance with state and federal civil rights laws guaranteeing equal access to public resources, not just the California Environmental Quality Act (CEQA). See Title VI of the Civil Rights Act of 1964 and its regulations, the President’s Order on Environmental Justice, California Government Code 11135 and its regulations, and the California statutory definition of environmental justice, Government Code 65040.12. (5) The guidelines should implement principles of equitable development: invest in people, invest in stronger communities, invest in the open, invest in justice.

We have an important opportunity to define and implement standards for equity to measure progress and hold officials accountable and to transform California into a more livable, democratic, and just place to live and raise children. We look forward to working with the Department of Parks and Recreation to meet these goals.

California Center for Public Health Advocacy • California Pan Ethnic Health Network (CPEHN) • The City Project •  
Concerned Citizens of South Central Los Angeles • Mujeres de la Tierra • PolicyLink • Prevention Institute • SPARC  
(Social and Public Art Resource Center)

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<sup>1</sup>Healthy Parks, Schools, and Communities for All: Park Development and Community Revitalization (The City Project Policy Report 2009); Robert García and Aubrey White, Healthy Parks, Schools, and Counties: Mapping Green Access and Equity for California (The City Project Policy Report 2007); Robert García and Aubrey White, Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for Los Angeles (The City Project Policy Report 2006); Support Fair Distribution of State Park Funds and AB 31 (The City Project Policy Brief 2008); all available at [www.cityprojectca.org](http://www.cityprojectca.org).

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# Park Acreage, Median Household Income and People of Color

